

Letter of Concern Regarding Industrial Wind Development in the Algoma District

To: Mike Mantha, MPP Algoma-Manitoulin
Via Email: mmantha-co@ndp.on.ca (Sent: 2018 07 18; Acknowledged: 2018 07 24)

Ross Romano, MPP Sault Ste. Marie
Parliamentary Assistant to the Minister of Energy, Northern Development and Mines
and Parliamentary Assistant to the Minister of Indigenous Affairs
Via Email: ross.romano@pc.ola.org (Sent: 2018 07 18)

Hon. Greg Rickford, MPP Kenora-Rainy River
Minister of Energy, Northern Development and Mines and Indigenous Affairs
Via Email: greg.rickfordco@pc.ola.org (Sent: 2018 07 31)

Hon. Rod Phillips, MPP Ajax
Minister of the Environment, Conservation and Parks
Via Email: rod.phillipsco@pc.ola.org (Sent: 2018 08 03)

Hon. Sylvia Jones, MPP Dufferin-Caledon
Minister of Tourism, Culture and Sport
Via Email: sylvia.jonesco@pc.ola.org (Sent: 2018 08 03)

Hon. Jeff Yurek, MPP Elgin-Middlesex-London
Minister of Natural Resources and Forestry
Via Email: jeff.yurekco@pc.ola.org (Sent: 2018 08 03; Acknowledged: 2018 08 03)

Hon. Jim Wilson, MPP Simcoe-Grey
Minister of Economic Development, Job Creation and Trade
Via Email: jim.wilson@pc.ola.org (Sent: 2018 08 03)

Hon. Victor Fedeli, MPP Nipissing
Minister of Finance
Via Email: vic.fedeli@pc.ola.org (Sent: 2018 08 03)

From: Executive Members of *Save Ontario's Algoma Region (SOAR)*
SOAR is an affiliate member of Wind Concerns Ontario.

Date: 2018 08 03

Since 2010, hundreds of Algoma District residents have expressed their concerns about industrial wind development in the Lake Superior Watershed Highlands north of Sault Ste. Marie.

It may not be possible to alter decisions made by the past Ontario government, but going forward, the present government may make decisions and choices which will help ensure a sustainable economy based on eco-tourism in Algoma's wilderness environment.

To assist in this task, the following observations and data concerning the development of industrial wind industry in Algoma are respectfully presented for your consideration.

Wind Concerns Ontario has provided data that clearly indicate that the attempt to harness the wind with industrial turbines to create a green energy economy has caused problems for humans and for the environment in our province.

In theory, it was not a bad idea: it just has gone horribly wrong.

Who would have thought that the plan to "green" the world by eliminating noxious pollutants in the process of creating "clean" energy would have rebounded with such dire results on human health and the environment which we are mandated to protect?

1. Despite mounting evidence, both anecdotal and science-based, to date the Ontario government has refused to acknowledge the impact of industrial wind turbines on Ontarians beyond the physical symptoms of vibro-acoustic disease. But, there is much, much more to consider in the determinants of human health.
2. Poverty impacts human health. The energy rates in Ontario which have skyrocketed due to the policies of "green" energy have impacted all Ontarians—especially those in lower income brackets and those who live in areas where a sustainable year-round economy is largely dependent upon eco-tourism in a natural environment untouched by the presence of industrial wind turbines.
3. Human Health *must* be addressed as defined by the World Health Organization (WHO).
4. The impact of industrial wind turbines on the environment *must* be addressed not only on *irreversible* harm but to the *potential* harm to all creatures and their wilderness habitat.
5. Despite the evidence of expert witnesses, to date the Ontario government has removed environmental protections, accepted flawed data from "researchers" hired by wind companies and dismissed the concerns of objectors as self-seeking. The comment from a lawyer hired by the Ministry of the Environment that "wind trumps" all evidence is, to say the least, an indicator of bias.
6. Although wind companies in Algoma were granted 20-year contracts, the Ministry of the Environment requires data of bird and bat mortality to be presented at post-operational community meetings for a 3-year period only. After that time, the public must request bird and bat mortality statistics directly from the wind companies.

The collective municipal voices of rural southern Ontario have expressed their concerns about the proliferation of industrial wind turbines.

Goulais River and Montreal River are located in unorganized townships where residents have no municipal representation. However, their concerns about industrial wind development must also be heard and heeded.

The Provincial Government serves the well-being of *all* Ontarians including those who live in the more sparsely populated, huge geographical areas of wilderness which make up some 85% of the province.

Although the Algoma District has only 0.8% of Ontario's population, three installations located in the Lake Superior Coastal Highlands north of Sault Ste. Marie produce 6% of Ontario's wind energy:

- **Prince Wind** (2006): Capacity Factor—approximately 26% in 2017
(Note: Prince Wind pre-dates the Green Energy Approval Process)
 - 4th largest wind installation in Ontario and the 6th largest in Canada at 189 MW capacity
 - 126 GE 1.5 MW wind turbine generators on 80-meter towers
 - located in Prince Township on the northwest outskirts of Sault Ste. Marie
- **Bow Lake–Nodin Kitagan** (2015) Capacity Factor—approximately 35% in 2017
 - generates 58.3 MW
 - 36 – 1.6 MW wind turbine generators on 146-metre towers
 - located at Montreal River, 80 km northwest of Sault Ste. Marie
- **Goulais Bay** (2015) Capacity Factor—approximately 34% in 2017
 - generates 25.3 MW
 - 11-2.3 MW wind turbine generators on 155-metre towers
 - located at Goulais River, 30 km north of Sault Ste. Marie

Environmental Concerns:

Part of the concern about industrial wind development in Algoma is the cavalier response of both the Ontario government and the wind developers to *potential* harm to the environment.

Save Ontario's Algoma Region (SOAR) recently requested the Sault Ste. Marie office of the Ministry of Natural Resources and Forestry for information concerning the monitoring of bird and bat mortality in the three wind installations sited in Algoma.

The following response was received from Melanie Johnson, Regional Renewable Energy Coordinator, on 2018 06 26:

Bill May, Resource Management Supervisor, Sault Ste. Marie District MNR has forwarded me your email for a response.

Proponents of wind facilities in Ontario are required to prepare reports detailing the post-construction monitoring results for a minimum of 3 years for all Class 3 and 4 wind power projects, as part of the Environmental Effects Monitoring Plan. MNR supports MOECC and the Renewable Energy Approval Regulation by reviewing post-construction monitoring reports to ensure they are prepared in accordance with approved guidelines.

The reports you are inquiring about are considered to be the property of the proponent. I would recommend that you speak directly to the proponent regarding your request to obtain copies of the monitoring reports.

To assure the concerned public that the bird and bat mortality statistics of all industrial wind installations are reliable, a third-party, objective assessment by scientifically trained professionals is required on an annual basis.

Environmental Facts:

- The Prince Wind installation is in the direct flight path of migratory birds funneling from the Upper Michigan Peninsular.
- The Goulais Bay Wind installation is in line with the Prince industrial wind turbines.
- The Bow Lake installation is in proximity to a known bat colony and migratory songbirds.
- The only monitoring station which can provide information about the migratory habits of birds in this area is the Whitefish Point Observatory located in Michigan. There is no Ontario- based collection of data for Algoma.
- The Environmental Review Tribunal for the Bow Lake wind project ruled in favour of the proponents despite expert witness presentations from the appellant which indicated potential harms did exist. (Transcripts of all ERT proceedings are available from the Ontario government.)
- The appellant of the Goulais project, could afford to employ neither the services of expert witnesses nor representation by legal counsel during the ERT. The only voluntary expert witness accepted by the ERT for the Goulais project was denied that status at the ERT for the Bow Lake project. No reason was given.

Request for Consideration:

- That the Ministry of the Environment, Conservation, and Parks be required to review the existing regulations with the intent of intensifying and supporting Environmental Protections.
- That the proponents (owners) of the three Algoma wind installations (Brookfield, Capstone and BluEarth/Nodin Kitagan) be required on an annual basis to pay for and publish to the public a third-party report of their respective bird and bat mortality rates and any resulting mitigations.
- That the conditions of appeal (i.e., harm to human health and irreversible harm to the environment) through the process of Environmental Review Tribunals be expanded to include the fullest definition of human health (i.e., the WHO definition) and all *potential* harm to the environment (flora and fauna) recognized by expert testimony.
- That the decision to cancel the position of a Science Officer as Advisor to the Ontario government be revoked. Science may not be political but it should be the basis for informed and wise political decisions concerning the environment.

Economic Concerns: Tourism in Algoma

According to the facts presented on the websites of the Sault Ste. Marie Economic Corporation and the Sault Ste. Marie Kinnewabi Tourist Association, tourism is an industry which is critical to the economy of Sault Ste. Marie and the Algoma District:

- In 2017, Tourism Sault Ste. Marie activity of attracting events and selling vacation packages generated more than 40,000 visitor days and \$5.8 million in direct visitor spending.
- Between 2008 and 2017, this activity generated over 395,000 visitor days, \$58.54 million in direct visitor spending, and millions more in indirect and induced economic spinoff.
- Tourism Sault Ste. Marie works to attract motor coach tours and other group travel to the community. The focus of these excursions generally centres around the Agawa Canyon Tour Train.
- In 2017, a total of 204 group tours, consisting of more than 12,000 visitors, came to the city.
- This activity generated approximately 26,000 visitor days and \$3.9 million of direct visitor spending for the local economy.

In a “green” world, eco-tourism plays an increasingly significant part in year-round sustainable job creation especially in the Algoma District where the coastal highlands of Lake Superior are recognized throughout the world for their scenic beauty.

Facts: The Impact of Industrial Wind Turbines on Tourism in Algoma

- Batchewana Bay Day Park, Pancake Bay and Lake Superior Provincial Parks located on the coastline north of Sault Ste. Marie attract thousands of visitors each year.
- The industrial wind turbines located on the southern coast of Goulais Bay are visible from each park. The blinking red lights needed for aviation safety have impacted one of the most prominent tourist attractions—the Algoma night sky. Night and day the wind towers intrude on the wilderness experience sought by tourists.
- The Agawa Canyon Tour Train passes through the turbines of the Bow Lake installation.
- Despite appeals to the then Minister of Tourism, Culture and Sport, industrial turbines at Bow Lake were erected in the Algoma landscape which inspired the paintings of the Group of Seven—a Canadian cultural heritage.

Request for Consideration:

- Given that Sault Ste. Marie, Ontario and Sault Ste. Marie, Michigan form the international gateway to Lake Superior, the Minister for Tourism, Culture and Sport is requested to be mindful of the mandate to *Work with the tourism industry and regional tourism organizations to bring international investment.*
- In the Algoma District “being mindful” means curtailing the potential damage of the encroachment of industrial wind turbines on the natural scenic beauty and cultural heritage of the region which attract millions of dollars to the local economy each year.
- Funding must be directed into research for forms of affordable energy which is harmless to all life.

The Lake Superior Basin is a national treasure which all Canadians and visitors to Canada have the right to enjoy in its natural state.

The people of Ontario have as a common goal the protection, conservation and restoration of the natural environment for the benefit of present and future generations (Environmental Bill of Rights, 1993).