



**Subject: Application for a Renewable Energy Approval for the Amherst Island Wind Energy Project submitted by Windlectric Inc**

I am writing on behalf of Heritage Canada The National Trust to provide comments and state our position that the Amherst Island Wind Energy Project submitted by Windlectric Inc. should not proceed to the technical review stage.

As the national voice for the conservation of built heritage in Canada, Heritage Canada The National Trust is following the proposed Amherst Island Wind Energy Project with great concern. We named Amherst Island to our list of the most endangered heritage places in Canada in 2013.

We are aware that the proposed project must comply with the Renewable Energy Approvals regulation O. Reg. 359/09 issued under the Environmental Protection Act. While we are aware of substantive issues with the project in many areas, our review here is limited to the proponent's compliance with subsections 19, 20 and 23 of O. Reg. 359/09.

Based on our review of the required Heritage Assessment materials prepared by Stantec Consulting Ltd. for Windlectric Inc., we find the proponent does not meet the requirements of the regulation in these areas, falling substantially short. We have outlined several of these shortcomings below.

For example:

**Cultural Heritage Landscapes:**

The Report provides no explanation or reason for the selection of four Cultural Heritage Landscapes from among the many significant landscapes on the island, or why the island as a whole was not considered as a single integrated Cultural Heritage Landscape.

In the case of the Village of Stella, the Report only identifies 10 properties as contributing to the Cultural Heritage Value and Interest of the area, and only two of those were evaluated (Trinity United Church and Neilson's Store), both of which are Protected Properties.

Although "historic roadway" is identified as a potential Cultural Heritage Landscape in *Cultural Heritage Resources: An Information Bulletin for Projects Subject to Ontario Regulation 359/09 – Renewable Energy Approvals*, none of Amherst Islands roads, most of which date to the early 1800s and are lined with mature trees, were included in the Report. This means that there is no information on the potential impact of road widening to accommodate 1,600-ton heavy lift cranes and other heavy-duty trucks.

**Built Heritage Resources:**

The Project Study Area includes Amherst Island in its entirety, yet only 24 Built Heritage Resources that are not already identified as Protected Properties (of which there are three on the

island) were selected for evaluation and assessment in terms of their Cultural Heritage Value or Interest. The Report provides no explanation or reason for the selection of these 24 buildings from the over 100 century-old buildings on the island, many of which are in close proximity to the planned construction areas.

The most glaring omissions include The Manse of St. Paul's Presbyterian Church, the Howard House (1810) and associated farm buildings (one of the oldest properties on the island), and the Blacksmith Shop in the Village of Stella.

There are also a number of Built Heritage Resources in the form of cairns, monuments, ruins and burial sites that the Report simply does not address.

Mitigating Impacts:

*Cultural Heritage Resources: An Information Bulletin for Projects Subject to Ontario Regulation 359/09 – Renewable Energy Approvals*, states that the Heritage Assessment Report must “identify and describe the extent of all potential impacts; describe how each identified heritage resource may be impacted with reference to the specific cultural heritage value of the resource; and examine mitigation options and project changes to prevent or reduce negative impacts. Finally, the [Report] must recommend a mitigation option and explain why it is preferred.”

The Report does not meet this requirement in the case of BHR 4, BHR 5, BHR 6, BHR 19, BHR 20 and BHR 21, where it is recommended that “All Project activities should cease if levels are exceeded until a solution can be determined.” This failure to examine mitigation options and project changes to reduce negative impacts is unacceptable and provides no confidence that the cultural values of the resources will be protected.

Similarly, in the case of the Village of Stella and St. Paul's Presbyterian Church Cultural Heritage Landscapes, the Report limits its recommended mitigation option to deal with excessive vibration or peak particle velocity levels to ceasing project activities “until a solution can be determined.” Again, this failure to examine mitigation options and project changes to reduce negative impacts is unacceptable and provides no confidence that the cultural values of the resources will be protected.

Additional shortcomings and gaps exist.

HCNT concludes that the Heritage Assessment is incomplete, and the project should therefore not proceed to the technical review stage.

Comments submitted by:

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