



**Souris & Area Branch of PEI Wildlife Federation Submission:
Environmental Impact Assessment Response for the
Proposed East Point Windmill Farm**

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Profile:

Souris & Area Wildlife Branch

The Souris & Area Branch of the PEI Wildlife Federation (SAB) has been in existence since 1954. SAB is served by a volunteer Board of Directors of varying occupations. There are approximately 500 active members representing the angling, hunting, conservation, naturalist and community sectors. The SAB has a management area of approximately 62, 000 hectares (~10% of PEI) composed of 27 watersheds.

The goals of the SAB include protection and enhancement of fish and wildlife habitats, watershed protection and restoration, education of the general public on wildlife and wildlife habitat, and the promotion of outdoor recreational sports. The SAB has been involved in the establishment of wildlife sanctuaries, wildlife habitat enhancement projects, erosion reduction, and control projects, fish habitat enhancement projects, and watershed planning.

In 2006, SAB was recognized provincially as the Environmental Group of the Year. SAB has published the first provincial community endorsed watershed management plan for Souris River. Additional community-driven watershed management plans were published for Basin Head in 2010 and North Lake & Priest Pond in 2012. In 2009, the SAB was awarded the Town of Souris' "Community Group of the Year" Award. SAB has also been recognized nationally with "Canada's Recreational Fisheries Award" in 2012.

The SAB has been involved in many large-scale projects. From 2007-2009, the PEI Ecological Goods and Services (PEI EG & S) Pilot Project took place in Souris River. The objective was to incorporate farm management practices that attempt to mitigate and prevent environmental problems associated with agricultural production. This led to the eventual creation of the Alternative Land Use Services Program, or ALUS. In 2010, SAB started a three-year project with Agriculture and Agri-Food Canada, entitled Project WEB's (Watershed Evaluation of Beneficial Management Practices). The objective of this project is to determine if spring ploughing leeches less nitrates than fall ploughing into groundwater and to determine if this is economically feasible to the farmer. In 2018, SAB partnered with East Prince Agri-Environment Association and Kensington North Watersheds Association in applying to Agriculture and Agri-Food Canada for a Living Lab - Atlantic project in which they were successful, This is a four-year project where environmentally-friendly agricultural pilot projects are trialed on farms with project leads from the scientific community and the data annually shared throughout the farm community.

SAB has also been responsible for the construction and operation of Basin Head Interpretive Park in 2019. SAB has operated for the past 5 years “Beyond the Beach”, a regularly scheduled experiential experience at Basin Head.

SAB works extensively with Fisheries and Oceans Canada in the Basin Head watershed, the only Marine Protected Area on PEI. SAB conducts extensive work in conjunction with a marine biologist in restoring the Giant Irish Moss that makes this watershed unique.

SAB has established strong communication with the stakeholders in its management area. They produce four newsletters annually that is mailed to 2000 homes, with an additional 500 sent via email. SAB is very involved in social media with 20,000 (Posts Outreach) on Facebook monthly and 12,000 (Posts Outreach) monthly on its website. SAB organises and delivers presentations on various environmental topics to schools on an irregular basis and partners with Eastern Kings Senior Neighbourhood Club with six environmental presentations annually.

The SAB is recognized as one of the strongest watershed groups on PEI and one of the most reputable watershed groups in Eastern Canada.

Our Concerns:

Souris & Area Branch (SAB) is very disappointed in the quality and effort put forward in this Environmental Impact Assessment (EIA).

SAB is exceptionally disappointed that their organization with a worthy track record were never asked to be involved in the consultation process of this proposed project.

We are also very disappointed in the PEI Dept. Environment issuing a special permit to allow cutting of roads for this project before it is approved by the Rural Municipality of Eastern Kings (RMEK) and before the EIA was reviewed and submissions made. If RMEK turns this project down, habitat damage was done in this watershed for no good reason.

SAB is also disappointed in the attitude of the PEI Dept. of Environment by judging the amount of opposition to this project by the number of submissions submitted in a negative view. Does this suggest that the number of positive submissions submitted is the only ones in favour? If you receive 20 submissions negative and 2 in favour, does that reflect 10 times the people are against it? If one submission contains only one statement and another contains 50 statements, are they equal?

We also are aware that the EIA was posted on the PEI Government Website on Oct. 29 but no information was sent to stakeholders that it was posted. Many people with astute computer abilities had difficulties locating it.

We also took note that much of this EIA was copy and pasted from the Hermanville Windfarm EIA.

SAB strongly disagrees with the location of this proposed wind farm. For the following reasons:

- Never should a windfarm of any size be installed amid a well know migratory flyway.
- Never should a windmill farm be in the woods.
- Never should windmills over 150 metres be installed because of interference with high flying birds (Federal recommendation Environment Climate Change Canada (ECC) and Canadian Wildlife Service (CWS))
- We noted within the “Wetland Conservation Policy Of PEI” (“This policy endorses the mitigation process, a hierarchical approach to wetland protection from development, **starting with the avoidance of wetlands as a top priority**”). This is not even close to been followed, which will be highlighted later in this submission
- Never should an industrial wind farm be erected in the neighbourhood where you have what appears to be “activity sites” for bats, at a time when their populations are so fragile in Eastern Canada.
- SAB has observed in their research of the most recent studies that evidence suggests that windmills tend to be less favourable as sources of green energy.
- SAB was shocked to read in the EIA (section 2.5) of the rationale for PEIEC to choose this site, “An expansion of the East Point Windmill Farm was ultimately chosen to minimize the additional footprint that would be required for new transmission lines.” It had nothing to do with wind? The environmental footprint 66 ft from centerline of the road is already impacted. We would suggest that PEIEC’s rationale for this site is profit, as existing transmission lines lessen their cost.
- SAB feels that these monstrous windmills can’t be hidden in such a narrow stretch of land and will destroy the natural landscape in Eastern PEI.
- Approximately 30% of the data used in this report is 20 years old or older. Water data that is 20 years old in an agricultural province like PEI is totally irrelevant as many land use changes have occurred since then.
- SAB feels the composition of the EIA “Technical Review Committee” and methodology used to enhance good decision making on major developments like windmill farms need to be overhauled.

Consultation with Stakeholders and Interest Groups: Section 3.5.2

Only 2 people contacted Tammy MacDonald (Director of Research and Outreach, Mi'kmaq Confederacy) and Danelle Elliot (Deputy Mayor, RMEK)

SAB was never contacted during the consultation process, although material was taken from our website. Other NGOs should also have been consulted as the proposed development will have impacts on their work: Eastern Kings Fire Dept., Island Nature Trust, Natural History Society of PEI, Basin Head Advisory Board Committee, Friends Of Elmira, Eastern Kings Seniors Neighbour Club, Points East Tourism Association, Port Committee North Lake, etc.

The last Public Meeting on Dec. 4th was illegal as the minimum number of days of advertisement was not legally met. The notice of Public Meeting was published in the Eastern Graphic on Wed. Nov, 27, 2019. The Subdivision & Development Control Bylaw (13.02.4) requires that seven (7) clear days of notice be given of the Public Meeting. Clear Days are defined by the Interpretation Act (23(4)) to exclude the first and last day, thus only 5 days given. Therefore, the meeting on Dec.4th was clearly null and void, setting themselves up for a court case.

Agenda of public meetings controlled for presenters on Dec.4 th. PEIEC worked with RMEK to ensure that they spoke last. The moderator controlled the speakers (10 min) except for speaker of PEIEC who went considerably over the allocated time slot. Is this a case of those who pay the fiddler calls the tune? Why was there a time limit on all speakers except PEIEC?

Buffer Zones:

The buffer zone for East Lake is 60 metres outlined in the official plan of RMEK. RMEK received an Environmental Award from the province of PEI for establishing such a large buffer zone compared to the Provincially enforced 15 metres. RMEK was recognised as the first municipality on PEI to establish such guidelines. Throughout the EIA document, the buffer zone was referred to as 15 metres: section 2.92, 5.2 table, 5.22 wetlands (5 times). The buffer zone in 5.22 (Fish Habitat /Water Quality) and 5.22 (Flora Species at Risk) was referred to as 10 metres. Only one exception being in 8.2.1 where 60 m is referred to for wildlife purposes only. The buffer zone in the municipality is clearly established as 60 metres and any project proposed needs to adhere to this regulation.

In section 8.2.1. they also refer to blueberry production in East Lake. There isn't a field of blueberries that exists in this watershed. This was obviously copied and pasted from Hermanville EIA where there are many blueberry fields. This weak professionalism gives one a poor attitude when reviewing the remainder of the document.

Fires:

Fires are recognized as a potential risk in wind turbines. In March of 2019, a fire occurred in a turbine in W Publico Nova Scotia. The local fire department responded to the incident in a prompt manner but were unable to act to extinguish the flames. The fire was left to burn itself out, with burning shrapnel being tossed over hundreds of metres. The local fire chief stated; “Lucky it was in March, if not we would still be here trying to put the forest fire out!”

If a fire occurs at East Point, the EIA suggests the protocol is to call Souris Fire Dept and if back up is needed to call St. Peters. They fail to identify that Eastern Kings has a well-equipped and highly trained fire department over 15 minutes drive closer to the wind turbines, with it’s headquarters located in Elmira. The Eastern Kings Fire Department is located on the main highway in Elmira, so one could assume that anyone conducting any assessments for the wind turbines must have driven past the well-signposted building on multiple occasions. Once again, it seems that this section was also copied and pasted from Hermanaville EIA.

There is no fire department on PEI with equipment that can shoot water 600 ft in the air to douse a fire, whilst it is fully admitted in the EIA that fires can and do occur in windmills, albeit infrequently. One would hope that any fires that do occur if the proposed windmill development goes ahead only occur during winter. If not, we could potentially have a forest fire in the fourth largest block of wood left standing on PEI. This will cause an increase in danger to people’s homes and destruction to wildlife habitat adjacent and including the Red Triangle. This another reason why windmill farms should never be installed in forested areas.

Birds: Sec 4.5.1

“The height of the turbines, however, is within the flight corridor of nocturnally migrating songbirds (Horton et al, 2016) which does present an elevated risk to migratory bird species: for this reason, ECC-CWS considers all windfarms with turbine heights greater than 150 m to have a very high site sensitivity” (ECCC, 2018).

PEIEC wishes to install 175m turbines as close as possible to the Red Triangle which is a small refuge site established by Canadian Wildlife Service for migratory birds. This site is already constantly diminishing in size due to extensive coastal erosion on the surrounding shorelines. It is, without question, irresponsible to install wind turbines when it is well established that our bird population has dropped 40-60% over the past 40 years. It is obvious that this division of the PEI Government has no respect for wildlife.

Careful study has indicated that 51 bird species in this area are considered to be of “conservation concern.” Four more species are endangered.

Piping Plovers an endangered species has nested at East Lake, Diligent Pond, North Lake, South Lake, East Point and Basin Head in the last ten years. The shadows, noise, and presence of these

windmills may affect their nesting habitat and habits. This is where the Island Nature Trust should have been consulted to assess the potential impacts of the development upon the endangered species.

The radar equipment set up at East Lake is good, but unfortunately, it was set up in August 2019 and information gathered until November 2019. Experts consider that one needs two years of data before any conclusive evidence can be drawn. 5 months is clearly too short a time period and misses out completely important bird migrations in the Spring.

Bats

Two species of bats were found in this area and we know of at least two activity sites of bats in proximity. Bats are in a fragile state in Eastern Canada and every effort is made by the federal government to protect them. According to the EIA, data equipment was set from June to September and it only worked 22 nights because of equipment failure. We feel this is totally inadequate and data must be collected for at least two years in order to have conclusive evidence.

Flora: Section 4.41

Much of the basis of their observations on this section (Rowe 1972) is close to 50-year-old data, especially concerning woodland. A vegetation survey (4 days) on a plot was done twice in 2019. This was all done for 4 days consecutively in June and Sept. We suggest that many of our early spring plants and late fall plants are missed in this small window. In our opinion, there is not enough recent data to support their statements. In cases where there are rare plants, the 10m buffer suggested in 5.22 is not sufficient.

Fish Habitat: Section 4.2

Suggesting that the only fish species utilizing this system are Brook trout, minnow species with a possibility of rainbow illustrates that no fish sampling was done. If they had consulted with SAB or Ducks Unlimited, we would have given them our extensive fish surveys of 2017 that includes many more species. Due to an overhaul of our website, this data was not posted. Once again, a lack of consultation with relevant organisations has led to misleading data and overall data deficiency.

Wetlands

According to land maps from 2010 available from the Province of PEI, we can locate several wetlands in this area. PEIEC announced that four new wetlands were discovered in the development area. Upon reviewing both 2010 Provincial map and EIA map, there seems to be very little difference in the marked habitat areas. Therefore, comments on this section are difficult without higher resolution maps from the EIA being made available.

However, one of the primary reasons why this large block of woodland has left untouched was because of the abundance of swamps which prevented landowners from accessing all of their property. The port of Souris shipped a great deal of pulpwood in the 1950-70s and most local landowners would harvest any woodland available for financial benefits. This development area remains untouched despite this because of the location of boggy ground and wetlands which made harvesting the wood infeasible. This land became the ultimate habitat for wildlife and now the province would like to destroy it.

T5 and T7 are obviously very close to a large wetland. Wetlands are well recognised as huge carbon sinks, far surpassing the storage of tropical and temperate forests due to the extensive root systems of the wetland vegetation. This makes them vitally important in the fight against climate change. Furthermore, destroying wetlands causes the carbon stored within the biomass to be released into the environment. So by destroying wetlands to install wind turbines to combat climate change, the proposal would also be significantly contributing to climate change. Furthermore, carbon credits are becoming more accessible for landowners, with new opportunities and businesses dealing in the carbon credit market developing which could make wetlands in this area become financially significant.

Decommission Phase

In sections 2.1 and 5.4 the EIA goes into detail about the decommission phase, which includes the removal of existing turbines, removal of infrastructure and returning the site to its natural state. This phase would happen after a 25-year timespan.

We fail to see who finances and monitors this phase. We are especially concerned about decommissioning because this phase has become problematic at many other sites in the world where costs have escalated above expected budget. We are also interested in seeing the plan of disposing of this equipment when it is removed from the site. We see nothing that indicates that there is a plan.

Transmission lines

We are concerned about the Electrical Magnetic Field (EMF) created by the flow of electrical current on the transmission lines concerning wildlife and human health. We know that it is recommended by many countries that homes should be built not closer than 300 ft of transmission lines. PEIEC installed present lines through the community of Elmira against the wishes of Eastern Kings Community Council in Phase 1. These lines were installed in some cases less than 30 ft from homes. In Phase 2, an additional 30 meg will be added to the present 30 meg on the same lines passing through the same community, culminating in 60 meg being transmitted through lines that are far too close to occupied houses.

The World Health Organization (WHO) recognizes a list of health problems arising from constant exposure to EMFs from transmission lines. Our local instrumentation indicates that the EMF levels coming from those lines are 10 -12 times those accepted in our homes by the same instrumentation.

We request PEIEC attain an expert (Health Canada) with sophisticated equipment to do a test when all existing 10 windmills are functioning in the presence of a councillor from RMEK and a staff member from SAB to verify. If they exceed the Canadian standards then an immediate plan, including compensation, must be created. If less, a press release should be issued to stakeholders to put their fears at ease.

Technical Review Committee

Composition

The Technical Review Committee is presently composed of DFO representative (Habitat Division) which is presently situated in Moncton, NB, a Wildlife Biologist (Fish & Wildlife Division), a representative from PEI Public Works and two representatives from PEI Dept. of Environment (Permit Section).

We would suggest that this committee should be larger and include a PEI Watershed Ecologist, a representative from the Canadian Wildlife Service, a botanist and a representative from the watershed group where the development is occurring.

Methodology

Presently, each member sends in privately their impact statements and the permit section from PEI Environment compiles them. No joint meeting or forum is held to discuss with each other the ramifications of each others findings.

We suggest that any development that is large enough to enact an EIA is worthy enough to have a joint meeting where each member can show justification for their statements. At the very least, a joint meeting would ensure that each representative has thoroughly read the EIA.