



November 10, 2011

Garry Perfect
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TransAlta
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Dear Mr. Perfect:

Subject: Ministry of Natural Resources (MNR) comments regarding Wolfe Island EcoPower Centre Post-Construction Follow-Up Plan Bird and Bat Resources, Monitoring Report No.5

Thank you for the opportunity to review the fifth biannual monitoring report for the Wolfe Island EcoPower Centre. MNR has the following comments based on our review of the document:

Direct Effects – Birds

Thirty one carcasses of 20 bird species were collected during the reporting period. The estimated annual bird mortality rate was 1.72 birds/MW (0.74 birds/turbine). When combined with the results of the July to December 20120 report, the annual mortality rate can be calculated to 10.0 birds/turbine (4.34 birds/MW). This is below the annual threshold of 11.7 birds/MW as established in the monitoring plan.

As identified in our previous correspondences, MNR continues to have concerns with the on going mortality of Bobolink on site. MNR representatives will be continuing discussions with you regarding the implications of species at risk mortalities which have occurred and appropriate authorizations required under the Endangered Species Act. We further recommend that monitoring and notifications continue as per the plan. Additionally, we also recommend initiating discussions with appropriate agencies or species experts regarding species at risk on site, to avoid further impacts to those species.

Direct Effects – Raptors

Seven raptor fatalities were recorded over the course of the reporting period; two Red-tailed Hawks, three Rough-legged Hawks and two Ospreys. When corrected for scavenger removal, this represents an approximate mortality rate of 0.19 raptors/turbine or 0.08 raptors/MW for the reporting period. Raptors and vultures are listed on the same Schedule (7) of the Fish and Wildlife Conservation Act, so mortality data is combined for the two. When combined with results from the July to December reporting period, the annual mortality for raptors was calculated to be 0.28 raptors per turbine (0.12 raptors/MW). This estimate annual mortality is greater than the notification threshold of 0.09 raptors/MW as identified in the Follow-up Plan.

As per the options outlined in the Post-Construction Follow-Up Plan, MNR and TransAlta have worked to develop a raptor behavioral monitoring study to assist in determining factors that may contribute to raptor mortality at the facility. We have reviewed the results of the Raptor Behavioral Study, as presented in Monitoring Report Number 5 and would recommend further

discussion in upcoming reports on what future considerations can be made with respect to the design or operations of wind power facilities in the future.

Disturbance Effects Monitoring – Raptors

The annual variability of raptor abundance and distribution can be closely attributed to available prey. Additional comparisons of this trend in other areas of Ontario, including areas outside of the Kingston area, may further our understanding of those cyclical trends. In addition, and as identified in the report, landscape and land use changes may have an effect on the relative distribution of raptor species at Wolfe Island. It may be valuable to develop a general historical representation of land use and more specifically farmed crop rotation (pasture, crops, hay) to further support this determination.

Within and among-year comparisons will continue to be important in quantifying any disturbance effects. We ask that you continue to implement the plan and ensure that data is presented and compared for both within, and among-year variations. Continued monitoring will provide a better indication of long term trends.

Direct Effects - Bats

Considering correction factors, the seven bat carcasses recovered represent approximately 0.48 bats/turbine or 0.21 bats/MW for the reporting period. When the annual estimated mortality is calculated, the resultant estimated annual mortality rate of 9.71 Bats/MW. This is below the adaptive management thresholds of 12.5 bats/MW as identified in the Follow-up Plan.

MNR is currently developing the 'Bat and Bat Habitats Guidelines for Wind Power Projects (Draft March 2010)' which all new wind power projects subject to the MOE's Renewable Energy Approvals regulation will be required to follow. The Guidelines require operational mitigation when post-construction monitoring shows an estimated bat mortality rate for a facility to be more than 10 bats/turbine/year. The operational mitigation consists of changing the turbine cut-in speeds, or feathering of wind turbine blades from sunset to sunrise during the period of July 15 to September 30.

As noted in our correspondences, MNR is supportive of the research that has been implemented to evaluate practical measures to reduce bat mortality at the Wolfe Island EcoPower Centre. It is our understanding that this research includes operational control of selected turbines during night time hours under low wind conditions. We look forward to reviewing the results of this study as they become available in upcoming reports.

MNR supports the recommendation to continue mortality and disturbance effects monitoring, as per the February 2010 Follow-Up Plan, with consideration of comments provided above.

Thank you for the opportunity to review and provide comments. Please feel free to contact me with any comments or questions.

Sincerely,



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Renewable Energy
Planning Ecologist
Peterborough District

cc Rob Read, Environment Canada
Mathieu Leblanc, Natural Resources Canada
Karen Bellamy, District Manager, Ministry of Natural Resources