

Appendix C:
Correspondence with MOECC

Algonquin Power Co.

2845 Bristol Circle
Oakville, Ontario,
Canada L6H 7H7

Tel: 905.465.4500

Fax: 905.465.4514

May 01, 2015

Mr. Mohsen Keyvani
Director
Environmental Approvals Branch
Ministry of the Environment and Climate Change
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

Attention: Mr. Mohsen Keyvani, Director, Environmental Approvals Branch
Reference: Amherst Island Wind Energy Project ("Project") - Proposed Modifications
MOE reference # 1271-96VNH3

Dear Mr. Mohsen Keyvani;

As you know, Algonquin Power (on behalf of Windlectric Inc.) is developing the Amherst Island Wind Energy Project (the Project), a proposed 75MW wind energy project on Amherst Island, located within Loyalist Township in the County of Lennox and Addington in eastern Ontario. As discussed with your office, Algonquin Power is considering three modifications to the REA application for the Amherst Island Wind Project, each of which are described further below. We are writing to seek confirmation from the MOECC that these changes would be assessed as Technical Changes under the MOECC's Technical Guide to Renewable Energy Approvals.

The three proposed modifications are: (1) a change in turbine model and associated reduction in the number of turbines, (2) a change in collection system routing to avoid the Village of Stella and (3) changes to the road and collection system to avoid some activities on 2nd Concession. In general, these proposed changes will reduce the Project's already minimized impact on the environmental and archaeological and cultural heritage resources. Further detail is set out below regarding why these changes meet the factors for a Technical Change classification outlined in Chapter 10, Section 2.2 of the Technical Guide.

1. *Reducing the number of Wind Turbines by changing Turbine Model (Siemens 2.942 MW and 2.772 MW)*

This modification involves changing the Project's turbines from a combination of Siemens 2.3 MW and 2.221 MW to a combination of Siemens 2.942 MW and 2.772 MW, and thereby reducing the number of turbines from 33 to 26. The new turbines would be physically identical, specifically with a hub height of 99.5 m and rotor diameter of 113 m.

The modification qualifies as a Technical Change because:

- (a) It will decrease the Project Location size by reducing the number of turbine sites from 33 to 26, including through the removal of two turbine locations closest to Stella: S06 and S15.
- (b) It will decrease the overall impact at the noise receptors near the Project Location because the noise profile of the proposed turbines, when combined with the reduction in number of turbines, results in lower sound levels at all receptors.
- (c) It will not require additional archaeological or cultural heritage assessment. Assessments of all 36 current turbine sites has been completed, and the modification does not involve the relocation of any turbine sites. Therefore, there are not expected to be any changes to the previous recommendations or comments received from the Ministry of Tourism, Culture and Sport (MTCS) for further assessment.
- (d) It will not require any additional natural heritage assessment (NHA). As above, the NHA for all 36 current turbine sites has been completed, and the modification does not involve the relocation of any turbine sites. Therefore, there are not expected to be any changes to the previous recommendations or comments received from the Ministry of Natural Resources and Forestry (MNRFF). If anything, MNRFF may reduce its environmental effects monitoring recommendations given the reduced Project footprint.

2. *Collection System Route Change 1 – Avoiding the Village of Stella*

This proposed modification would involve rerouting the collection system to avoid the Village of Stella. In doing so, this modification would remove a significant portion of the existing collection system from S30 entrance along Front Road, including by removing approximately 4 km of road allowance trenching (including through Stella). The modification would also require new collection corridors from S13 to South Shore Rd. and west to S14 entrance, which would consist of approximately 1 km in road allowance and 700 m of in pasture field.

The modification qualifies as a Technical Change because:

- (a) It will decrease the Project Location size by resulting in a net reduction of approx. 2 km of collection system trenching.
- (b) It will require only minimal additional archaeological and cultural heritage assessment. Regarding the new 1 km collection corridor in road allowance, no Stage 2 archaeological

assessment would be required because the area has been previously disturbed. Regarding the new 700 m collection corridor in pasture field, in 2012, Stantec Consulting conducted Stage 2 archaeological field assessments along approximately 600 meters of this corridor. Only the remaining 100 meters of the proposed corridor would need to be completed for a stage 2 archaeological assessment. Nonetheless, given the results of the assessment in this corridor to date, which did not identify any archaeological sites, there are not expected to be any changes to the previous recommendations or comments received from the MTCS for further assessment. Rather, after an addendum to the Stage 2 Archaeological Assessment Report, Heritage Assessment Report and the Protected Properties Assessment Report are filed with MTCS, we expect a re-confirmation letter (or equivalent) will be obtained.

- (c) It will not require any additional NHA given that natural heritage site investigations have previously been completed for the relevant locations. As a result, additional site visits are not required to determine the status and boundary of natural features in the corridors. Based on the existing studies, no new potential effects are anticipated as a result of the modification. Therefore, an addendum to the Natural Heritage Assessment Report will be filed with MNRF and we expect a re-confirmation letter (or equivalent) will be obtained.

3. *Collection System Route Change 2 – Reducing Impacts on 2nd Concession*

This modification would involve the addition of an underground collector line between T16/T23 and T35. The collector line has been incorporated into the design of the access road between T16/23 and T35.

The modification qualifies as a Technical Change because:

- (a) It will decrease the Project Location size by removing approximately 3 km of double circuit trenching on 2nd Concession.
- (b) It will not require additional archaeological or cultural heritage assessment. Assessment for the proposed new route has already been completed as part of the assessment of an access road that would no longer be required with the reduced turbine layout. Therefore, there are not expected to be any changes to the previous recommendations or comments received from the Ministry of Tourism, Culture and Sport (MTCS) for further assessment.
- (c) It will not require any additional natural heritage assessment (NHA). As above, the NHA for the proposed new route has already been completed. Furthermore, no new potential effects are anticipated as a result of this modification. Therefore, there are not expected to be any changes to the previous recommendations or comments received from the MNRF.

In summary, none of the three proposed modifications described above will result in increased negative environmental effects that will or are likely to occur beyond those originally identified, documented and consulted on during the REA process for the original project. The table below summarizes the various components underlying this assessment, which we will confirm with supporting documentation when a formal Project modification request is submitted.

Environmental Component	Potential Negative Environmental Effects	Mitigation Measures	Monitoring Requirements
Natural Environment Components			
Air Quality	No additional negative effect	No additional mitigation required.	No new monitoring required.
Soil Quality	No additional negative effect	No additional mitigation required.	No new monitoring required.
Soil Quantity	No additional negative effect	No additional mitigation required.	No new monitoring required.
Groundwater	No additional negative effect	No additional mitigation required.	No new monitoring required.
Surface Water Quantity	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Surface Water Quality	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Aquatic Habitat and Biota	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Woodlands	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Wetlands	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Wildlife Habitat	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Wildlife	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Socio-Economic Environmental Components			
Noise	Reduction in noise, due to turbine model change.	No additional mitigation required.	No new monitoring required.
Public and Facility Safety	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Change in Visual Landscape	Reduced visual impact, due to fewer turbines.	No additional mitigation required.	No new monitoring required.
Property Values	No additional negative effect.	No additional	No monitoring

Environmental Component	Potential Negative Environmental Effects	Mitigation Measures	Monitoring Requirements
		mitigation required.	required.
Availability of Resources	No additional negative effect.	No additional mitigation required.	No monitoring required.
Recreational Land Use	No additional negative effect.	No additional mitigation required.	No monitoring required.
Infrastructure	No additional negative effect.	No additional mitigation required.	No new monitoring required.
Traffic	Reduced impact on traffic in the Village of Stella, due to fewer construction activities in the area.	No additional mitigation required.	No new monitoring required.
Archaeological and Heritage Resources	Reduction in potential effects to two previously identified Protected Properties due to fewer construction activities in the Village of Stella. Reduction in potential effects to the previously identified Cultural Heritage Landscapes 1 (Village of Stella), due to fewer construction activities in the Village of Stella.	No additional mitigation required.	No new monitoring required.

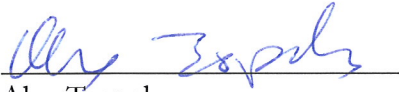
CONCLUSION

In our view, the proposed modifications described above are properly classified as Technical Changes because they meet the factors set out in Chapter 10, Section 2.2 of the Technical Guide. Most importantly, the proposed modifications will not result in an increase in the negative environmental effects that will or are likely to occur beyond those that were identified, documented and consulted on during the REA process for the original layout. In fact, the proposed modifications will reduce potential effects associated with the Project, especially given the substantial reduction in the number of turbines and the net reduction in length of and disturbance associated with the collection corridors. Therefore, we request confirmation from you that, if submitted as described above, the proposed modifications would be classified as Technical Changes.

If you have any questions or require any further information please do not hesitate to the undersigned at 905-829-6388 or Sean Fairfield at 905-465-4518.

Regards,

Algonquin Power Co.
On behalf of Windlectric Inc.

A handwritten signature in blue ink, appearing to read "Alex Tsopelas", is written over a horizontal line.

Alex Tsopelas

Project Manager, Renewables

cc: Sean Fairfield, Algonquin Power Co.

Kerrie Skillen, Stantec Consulting