

DRIVING GROWTH ... PROMOTING THE COUNTY EXPERIENCE.

September 16, 2009

Aaron Peters Central Regional Project Director Skypower Corporation 250 Yonge Street, 16th Floor Toronto, ON M5B 2L7

Re: Request for elevation - Byran Wind Project (BWP)

Dear Mr. Peters:

The purpose of this letter is to request that Skypower Corporation (Skypower) voluntarily elevate the Environmental Review of the Byran Wind Project to an individual Environmental Assessment. In his presentation to Municipal Council, and as reported by the Belleville Intelligencer on July 30, 2008, the President of Skypower, Mr. Adler said that it would offer to pay the county to hire independent consultants to study the proposal — a move that could cost \$200,000 to \$300,000. Adler said the offer was made to show that Sky- Power is willing to work with the community to ensure the project can go ahead. "I think the community needs an independent consultant and we will fund that cost because we don't think the community should have to bear the cost of satisfying themselves and the government of the community that the developer has done a responsible job."

This hasn't happened. Skypower's ERR offers no proper study of the community, evidence of meaningful consultation, evidence for potential the socio-economic impact, or the effect on tourism in either the County or the PSA. These major deficiencies underscore the need for an individual environmental assessment.

The primary reason for making this request is that the material presented by Skypower and the Byran Wind Project Environmental Review Report (ERR) does not adequately address the concerns we have on adverse socioeconomic impacts to the whole community, specifically with regards to tourism.

There are many potential benefits to doing a proper individual environmental assessment. First, it would enable Skypower to complete the currently incomplete noise studies (taking wind-shear into account for example), low frequency sound, and vibration studies in this particular rural setting, rather than generalizing from data collected elsewhere. Second, it would afford Skypower the opportunity to familiarize itself with the real and vibrant economic activity existing within the County, and through further community consultations could ensure that significant setbacks from established and contemplated tourist routes be established.

Third, it would enable the company to develop concrete plans for mitigating the significant disruption to tourism traffic during the height of our season.

Fourth, it would allow them time to develop the visual models currently lacking from their presentations, so that consultations could take place using real visual models to discuss methods to mitigate the visual impact on tourism, tourist accommodation, traffic, and towns.

Fifth, this would provide the opportunity for site specific economic analysis regarding property values and the impact of the Byran project on adjacent properties.

Finally, it would enable a proper assessment with respect to the rare and endangered migratory and nesting species that are within the PSA.

Sincerely,

The Board of Directors of Taste the County (Prince Edward County's Tourism Destination Marketing Association)

Taste the County Office:

P.O. BOX 442, 289 MAIN STREET, BLOOMFIELD, ON KOK 1G0 P 613.393.2796 F 613.393.3751 E TASTETHECOUNTY@BELLNET.CA

Introduction

Taste the Countytm is the not-for-profit destination marketing organization for Prince Edward County. During the past 10 years, it has won numerous awards for its innovative marketing, for bolstering tourism as one of the main pillars of Prince Edward County's economy. It is comprised of over 250 business members, who perceive tourism as a part of their core business and destination marketing as an activity that would enhance their business. It has an elected board, comprised of 11 members.

We have submitted this response to the Byran Windfarm Project's ERR because of serious concerns about fundamental flaws in the data, assumptions and statements within the ERR as they pertain to the County, specifically around those issues that concern tourism.

Further, when Skypower presented to Council, the president offered to pay for a full environmental assessment. In light of the inadequacies reflected by the report, and considering that several independent studies have documented negative impacts on tourism, we ask that you elevate the Environmental Review to an individual assessment.

Public Consultation

The public consultation plan for the Byran Wind Project as executed has not been successful in providing the community with sufficient information on the project (during the course of the study), an objective overview on the project and potential negative impacts, nor sufficient time to review the information and comment upon it.

Prior to the second community information session¹, which was only six (6) or fourteen days² prior to the issuing of the Notice of Completion, Skypower had provided very limited details on the project to the public.

At the first community information session ³ Skypower provided limited project specific information on the project. As an example, the primary study area of the project was not even indicated on a map⁴ displayed at that meeting. At that first information session and subsequent to it, Skypower had indicated that there would be a second community information meeting which would provide more of the details people were asking for. In addition, Skypower's website⁵ indicated that a draft report would be available in the fall of 2009. The information provided by Skypower would lead reasonable people to conclude that the requested information or particulars of the project would be provided at a later time and Skypower would provide them with sufficient time to review, consider and comment on the project.

¹ Community Information Session II, August 11, 2009 Picton Community Centre

² Skypower indicated at the Aug. 11, 2009 session that the Notice of Completion would be posted Aug. 17, 2009. The original ERR available in printed form also indicated that it had been posted on Aug. 17, 2009. Subsequent documents indicated Aug. 25, 2009

³ Community Information Session I, March 5, 2009 Picton Community Centre

⁴ Byran Wind Project Overview – Display Panel Community Information Session I March 5, 2009

⁵ <u>http://www.skypower.com/SKYPOWER2008/BYRAN/project_overview.html</u> website indicates (under

Environmental Screening) that a Draft Report was estimated to be available in the fall of 2009

Skypower has effectively limited comments or concerns expressed by the public by their execution of the public consultation plan. Only 55 comment forms were gathered by Skypower in these two sessions, most were negative or seeking more information – but still, a very small number from a community of 25,000. In addition where concerns have been expressed⁶ they appear to have been given little consideration in the ERR. Indeed, many people have only just learned of the project and others of its kind.

Further, one of our board members attended that meeting and specifically asked for copies of the Tourism study in a personal discussion with Aaron Peters, Central Region Project Coordinator. This conversation is documented in the ERR. The ERR goes on to state incorrectly that the questions were answered, and that a letter was sent. Certainly none was received by the board member. The tourism study has not been received, nor was it included in the ERR.

The debate over wind energy projects in Prince Edward County has been divisive within the community. The divisiveness has the potential to continue for many years, extending throughout the life of the project. The community would benefit greatly by having the concerns expressed dealt with more completely by an individual Environmental Assessment.

Although the report acknowledges tourism as one of the County's Four Economic Pillars, so far as we have been able to determine, no representatives of tourism within the County have been consulted during the planning process. Taste the County was not consulted, The Tourism Destination Alliance was not consulted, the Prince Edward County Winegrowers Association was not consulted, nor were the steering committees of the Taste Trail, the Arts Trail or the Studio & Gallery Tour. The Ontario Culinary Tourism Alliance, headquartered in the County, was not consulted. The Slow Food Convivium – the largest in North America – was not consulted. Tour operators were not consulted. The hospitality sector was not consulted.

If they had been, they would have been only too happy to correct the many incorrect statements about the County and tourism that are in this report. As it stands, the ERR offers statements about tourism in the County and the PSA that we believe are misleading. This major deficiency underscores the need for an elevation to an individual environmental assessment.

Tourism Study and Socio-Economic Impact Mitigation

The Stantec Environmental Assessment describes the **Green** Energy Act as a document for the protection, conservation and wise management of Ontario's environment by establishing a responsible and accountable process for decision-making before a project is undertaken." (Stantec, 2-3) But the ERR does not provide sufficient information on the potential negative economic impacts of the project on the community. No separate study was done on the impact on property values or on the impact on the

⁶ Petitions from Big Island residents and Concerned Citizens for Safe and Appropriate Green Energy as well as others whose concerns have been documented in the ERR.

business community which has a significant interest in tourism and related businesses in Prince Edward County. The main body of the report does touch upon these two issues, but due to their importance to the community warrant much further study and analysis.

It states that it conducted a socio-economic assessment to assess social, cultural and economic effects of the project.



The report also acknowledges that there are many areas where there could be a negative impact of the project.

4.3	cause negative effects on wetlands?		1	
4.4	have negative effects on wildlife habitat, populations, corridors or movement?	1		Field investigations and studies
4.5	have negative effects on fish or their habitat, spawning, movement or environmental conditions (e.g., water temperature, turbidity, etc.)?	1		Field investigations an studies
4.6	have negative effects on migratory birds, including effects on their habitat or staging areas?	1		Field investigations an studies
4.7	have negative effects on locally important or valued ecosystems or vegetation?	*		Field investigations an studies
5.	Resources			
5.1	result in inefficient (below 40%) use of a non-renewable resource (efficiency is defined as the ratio of output energy to input energy, where output energy includes electricity produced plus useful heat captured)?		*	
5.2	have negative effects on the use of Canada Land Inventory Class 1–3, specialty crop or locally significant agricultural lands?	1		Survey and micro siting
5.3	have negative effects on existing agricultural production?	1		Survey and micro siting
5.4	have negative effects on the availability of mineral, aggregate or petroleum resources?		1	
5.5	have negative effects on the availability of forest resources?		× .	
5.6	have negative effects on game and fishery resources, including negative effects caused by creating access to previously inaccessible areas?		*	
6.	Socio-Economic			
6.1	have negative effects on neighbourhood or community character?	1		Visual impact assessment
6.2	have negative effects on local businesses, institutions or public facilities?	1		Project planning
6.3	have negative effects on recreation, cottaging or tourism?	1		Project planning
6.4	have negative effects related to increases in the demands on community services and infrastructure?		*	
6.5	have negative effects on the economic base of a municipality or community?		1	
6.6	have negative effects on local employment and labour supply?		*	
6.7	have negative effects related to traffic?		1	
6.8	cause public concerns related to public health and safety?	1		Project planning
7.	Heritage and Culture			
7.1	have negative effects on hentage buildings, structures or sites, archaeological resources, or cultural hentage landscapes?	*		Archaeological investigations
7.2	have negative effects on scenic or aesthetically pleasing landscapes or views?	1		Visual impact assessment

It proposes to mitigate these negative effects on community character through "visual impact assessments." It is unclear how an assessment could mitigate an effect.

It proposes to mitigate negative effects on recreation, cottaging and tourism through project planning. In another part of the report it claims that their will be no negative impact on tourism. The ERR also quotes a study⁷ to support this statement , but in fact this study actually concludes that the touristic areas of Scotland with large wind farm development will suffer significant negative impact on tourism revenues.

⁷ The economic impact of wind farms on Scottish tourism: a report for the Scottish Government. In that report, they recommend setbacks of 7 kilometers from tourism corridors, to mitigate the negative impact on tourism. The report concluded a negligible impact on tourism at a national level, but a negative impact at the local level dependant on the existing local economy. The report suggests mitigating this impact by examining "number of tourists travelling past on route to elsewhere, the views from tourist accommodation in the area, the relative scale of tourism impact (i.e. local to national), the potential positives (i.e. information provision), and outdoor activity in the area." (Riddington 2003, 270) It is also worth noting that the turbines being evaluated were of a much smaller scale than the BWP 1.5 MW turbines of 120 meters in height.

It states that it will not have negative effects on the economic base of the community, although it acknowledges that tourism is one of the four economic pillars of the County's Official Economic Plan, and that it will have negative effects on tourism.

It states that it will not have negative effects on employment although many of those employed in the county are employed in tourism focused businesses.

It states that it will not have negative effects on traffic, but that it will seriously impede traffic flow on one of the three major access routes – and the one from the 401 from the east – for one year.

It states that it could have negative effects on scenic or aesthetically pleasing landscapes or views, and that it will mitigate this through a visual impact assessment.

No correlation between an economic base of tourism and the importance of the visual landscape to that base has been made. Additionally, the concept of tourism as a land-use has not been considered. We reject the stated assumption that these significant negative effects on the socio-economic factors within the community or on heritage and culture can be mitigated through either visual impact assessments or project planning that has, to date, excluded all those that have a stake in these specific facets of our community.

TOURISM, EMPLOYMENT & GDP

Stantec states that its project will create 5-10 permanent jobs, and have a positive impact on the economy by contributing \$ 100,000 per year in tax revenue, and a positive impact on tourism. Skypower cites four different wind farms which have reported a positive impact on tourism: All the farms but two have 5 turbines or less. The farm in Alberta, which has 60 turbines is located in a sparsely populated area, the nearest town of Pincher Creek has 3,660 residents. The North Cape Wind Farm in PEI has 16 turbines, and as a result of tourism, one restaurant has been built. All wind farms mentioned were constructed before 2003, with smaller turbines.

They offer the following description of the county's business and employment environment. This comprises the section on the employment and Labour force within Prince Edward County from the Stantec Report, and it omits tourism.

5.5.1.5 Employment & Labour Force

According to Statistics Canada (2007), in 2006, the unemployment rate in the County was 6.0%, compared to 6.4% as the provincial average. In the County, 23% of occupations are considered to be in sales or service, with an additional 16% considered to be in trades or equipment operation (Table 5-8).

The area in and surrounding the PSA can be generally characterized as rural with agricultural activity. Crops grown in the region include corn, soybeans and white beans, oats, barley, apples, strawberries and tomatoes (Dillon Consulting Ltd., 2004). Also, there is an emerging wine and grape industry in the County. Commercial farms fall into four types including: dairy farms, livestock other than dairy cows, fruit and vegetable farms, and mixed farming with livestock combinations (Chapman and Putnam, 1984). Livestock husbandry includes cattle, pigs and sheep.

The importance of the agricultural economy is demonstrated by Table 5-8. The economy of the County is reliant on the agricultural base, an emerging tourism base (section 5.5), and several significant industrial and commercial activities including the following:

- The Essroc Cement Factory;
- Highline Mushrooms in Wellington; and,
- Midtown Meats Processing Plant.

 Stantec						
BYRAN WIND PROJECT ENVIRONMENTAL REVIEW REPORT EXISTING ENVIRONMENTAL CHARACTERISTICS August 25, 2009						
Table 5-8 County Labour Force, 2006.						
Selected Characteristics	Ontario	County				
All Occupations ¹	6,473,735 (100%)	12,445 (100%)				
Management occupations	666,485 (10.3%)	1,135 (9.1%)				
Business, finance and administration occupations	1,204,490 (18.6%)	1,615 (13%)				
Natural and applied sciences and related occupations	451,930 (7.0%)	505 (4.0%)				
Health occupations	340,690 (5.3%)	870 (7.0%)				
Occupations in social science, education, government service and religion	546,385 (8.4%)	1,155 (9.3%)				
Occupations in art, culture, recreation and sport	200,980 (3.1%)	495 (4.0%)				
Sales and service occupations	1,522,820 (23.5%)	2,870 (23%)				
Trades, transport and equipment operators and related occupations	911,250 (14.1%)	1,945 (15.6%)				
Occupations unique to primary industry	165,085 (2.6%)	1,070 (8.6%)				
Occupations unique to processing, manufacturing and utilities	463,610 (7.2%)	780 (6.3%)				

Note

 15 years and over, by occupation – 2006 National Occupational Classification for Statistics. From Statistics Canada 2007.

A very different picture is presented by recent data from the local economic development office, or the Prince Edward County Tourism Development Alliance, or Statistics Canada, and is readily available to anyone caring to ask.

In 2007, tourism in Prince Edward County attracted 500,000 visitors, employed over 800 people, generated \$47 million in GDP, and generated \$27million in revenue for three levels of government.⁸

Tourism is Prince Edward County's single largest economic driver. In fact, according to the Economic Development Office in Prince Edward County, arts, culture, heritage, tourism, and commerce now represent an \$85-100 million-a-year economy for Prince Edward County that continues to grow. Tourism specifically is expected to contribute approximately \$68 million to the County GDP in 2010 and to support at least 1258 jobs. The five "Ontario's Finest Inns" alone employ over 240 people. There are over 450 tourism focused businesses located within the county. Agriculture - which includes viticulture, and over fifty vineyards and twenty wineries who sell from the farm gate - represents a \$70 million-a-

⁸ Statistics Canada, TSRC, and ITS for CD13-Prince Edward County 2007

year contribution to the economy. Residential and commercial development – driven by visitors who have decided to stay and entrepreneurs who have moved here, another \$70-80 million. In all, these sectors represent thousands of jobs, as well as the sizeable investments of many business owners.

Prince Edward County has a rich cultural heritage evidenced by the many museums and historic sites that exist in almost every town and village. The County is home to one of the largest per-capita concentrations of artists in almost any rural Canadian community. The fall Studio Tour, which draws approximately 5000 tourists in September, the Arts Trail, which has over 20 year- round locations, the Jazz Festival, which draws thousands of tourists in August to over 40 locations, the Maker's Hand, named one of the best craft festivals anywhere in Ontario, and the vibrant music and theatre scene, all attest to the reality of a vibrant creative rural economy in Prince Edward County. The Cultural Round Table is a unique county invention, and represents almost every sector of the economy. The volunteers at that table have developed a unique Cultural Plan, adopted by the municipality. As a result of their efforts, many spin-off activities have occurred: Celebrations of County Culture, the new County Community Foundation, theatre training for high school students, and Trillium grants for many creative initiatives. Artists have been drawn to the natural beauty of the County. Their impact on the vitality, interest, and attraction for residents and tourists alike is significant. Their presence has also resulted in a new generation of artistic entrepreneurs moving to - or back to - the County, putting down roots, making investments, and finding the room to express their creativity. These artistic communities not only attracts tourists, but also export products made within the County, through fairs, exhibitions, shows, agents, as well as the internet.

Vast numbers of business proprietors and employees depend directly and indirectly on a yearly visitor influx. Prince Edward County has developed a strategic economic plan⁹ of which a key component is the role of tourism to attract potential new residents and to support the commercial economic sector where many businesses are made viable because of visitors.

In just the past two years the following tourism related businesses have opened their doors: Blumen Garden Bistro, East on Main, Chesterfields, Books and Company, Miss Lillie's Café, Fifth Town Artisan Cheese, Michael Grills Photography, The Oeno Gallery, Del Gato Estates, Redtail Vineyards, Half-Moon Hay Vineyards and Winery, Hillier Creek Winery, Kein-te Winery, Carriage House Cooperage, Fairview Farm, Bethel Organics, Gallows and Graveyards Walking Tours, Red Roof Gallery, Round the Bend Gallery, Suites on the Lake Studio Gallery, Black Pig Gallery, Beach Street Studio, Ruths Canteen, Sandbanks Vacations, Scout Design, Quinte and County Living Magazine, County Grapevine Magazine, Grey Cottage at Green Point, Cherryvale Organic Farm. Fifty new rooms have been added at the Waring House Inn this year, a development of 237 cottages is being built, theatre ticket sales are up 50% this year, wineries are up about 15% in sales.

⁹ WCM Consulting Inc. "Market Readiness Assessment and Strategic Economic Development Plan Prepared for Prince Edward County." *WCM Consulting Inc.* (September 2004), http://www.buildanewlife.ca/site/index.php/Collaboration-Centre/Report-Index/Report-Index.html.

TOURISM – CENTRED ON A SENSE OF PLACE

Queen's University recently conducted a study on successful rural tourism economies, and focused part of their report on what they described as the Prince Edward County "Place Effect". This is their description.



In contrast this is the description from the Stantec Report.

5.5.9 Visual Landscape

It is generally understood that the physiography and land-use of an area largely contributes to the visual characteristics of the given landscape. The PSA is relatively flat and open and is primarily used for agricultural purposes with smaller areas of upland forest, marsh, red cedar thicket, old fields and pasture. The main source of vertical relief within the PSA is created by wooded areas, low-lying wetland areas and by an escarpment to the west of Demorestville along the northern portion of the PSA. Additionally, hedgerows, residential properties and other man-made structures such as pole-mounted distribution lines exist along several of the roads within the PSA.

Concentrations of residences occur in North Port, Demorestville, Bloomfield and Picton, though clusters of permanent and seasonal dwellings occur throughout the PSA. Other man-made structures, such as barns, silos and utility poles also occur throughout the PSA, adding to the visual diversity of the landscape. The wind turbines will be visible from some distance. Treed zones around the PSA indicate that the turbines will be obscured from many vantage points.

The visual characteristics of the Project and the surrounding landscape are considered to exhibit minimal to moderate scenic attributes with respect to landscape distinction. That is, the landform of the PSA tends to exhibit indistinct surface patterns due to uniformity in land use and vegetation.

Siting for the Byran Wind Project turbines "was initially determined through the analysis of meteorological data.," which we contend was inadequate to assess the real community on the ground. These so-called "*minimial to moderate scenic attributes with indistinct surface patterns and vegetation*" have been featured in tourism magazines around the world. Examples are included with this submission. The visual diversity of the landscape is not created by "utility poles". Rather it comes from the varied nature of the landscape, the wetlands, the 800 kilometers of shoreline, the many and varied in-land waterways, the colours of the crops, and the play of the light upon the land.

The ERR also states: "A land use policy to provide potential for tourism activities such as water-oriented recreation, cycling, and touring forms an important part of the County's Official Plan" (pp.5-56, 55-7).

Since the implementation of that official plan in 2004, much of that potential has been realized in significant ways not documented or recognized by the ERR, despite the fact that this information is readily available from any of the above organizations.

The ERR describes a number of tourist attractions, but implies that the "scenic" areas are limited to those designated as provincial parks. Unlike some areas, where tourists are drawn to specific town or attraction, the county's tourism attractions are scattered around the county and our Trail system is a testament to that. In fact, in 2007, only 18% of visitors visited a provincial park. The others pursued other activities around the County. For example, the Taste Trail leads visitors to vineyards, organic farmers' farm-gates, and restaurants around the island. It extends through the PSA along highway 49.The Arts Trail includes highway 49 and is this year extending to Northport.

Both of these are tourism marketing initiatives of Taste the County, and both have won numerous provincial and national awards, and have been covered by magazines and television programs from as far away as Australia, Japan, Germany and France. In 2007, 38,000 international tourists – or 8% of the total - came to the County based on its reputation for unspoiled rural natural beauty. These 8% were responsible for 19% of total tourist spending in the county, and also contributed to regions' businesses through spending on travel services.

The ERR does not acknowledge that HWY 49 – which it acknowledges will be significantly affected for a period of one year during construction – is one of the three major gateways into the County. It is specifically the route travelled – and the only convenient route – for tourists from the National Capital Region, Kingston, and Quebec to travel to the County. These tourists represent approximately 30% - or 150,000 visitors to the County and a substantial portion of the tourism revenue. Nor does the report suggest any mitigation for this.

ERR fails to report that Cultural Heritage Tour Route #5, well advertised in the red map used by both tourists and locals, virtually bounds the PSA, running along Hwy 49 and 62 and County Roads 4, 14 and 15. Tourists, whether in automobiles or on bicycles, will have a prime view of wind turbines all along the route.

The ERR also does not reference any businesses within the PSA that are dependent on tourist traffic, nor the trails that lead to them. The award-winning ARTS TRAIL leads to Bill Reddick's studio in Northport, and the Red Barns on HWY 49. Tourists wind through the PSA on the Prince Edward County Studio and Gallery Tour trail to visit artists, such as Mia Lane at Fish Lake, arts and antique stores in Demorestville and Gommorah, specialized accommodations (Quinte View Cottages and Bay Crest Lodge and Marina; and Saha Yoga centre -- all on Big Island), general accommodation (Sunset Cabins and Arcanada B&B, both in Northport), as well as organic and market-garden operations on Big Island and County Road 15 and vineyards, with the potential for wineries, near County Road 15. New micro breweries and newly planted hops fields near Hops Corner at Fish Lake have the potential to become as big a tourist draw as vineyards have proven to be, bringing back the crops that led to the County's original barley days.

All these serve mostly out-of-county customers who come here precisely because the County is not the same as everywhere else, who take "horn trips", criss-crossing the county, because of its undisturbed rural scenic beauty and who may not want to drive through an area dominated by industrial

energy production facilities that will stand hundreds of feet taller than any other feature in the landscape.



Japanese Tourism Magazine – 18 pages on Prince Edward County's rural charm 2008

Wards: Pilol French Photography: Mackendia Strok

WeekendenProjet de fill de opmeine

Prince Charming

An island on Lake Ontario is reinventing itself as a haven for those in search of good food, good wine - and a better way of life.

Une ile du lac Ontario s'est réinventée en paradis pour les amateurs de bonne chère, de bon vin et d'un certain art de vivre.

local tells me as we drive across the swing bridge at Carrying Place and enter a part of Ontario that seems enticingly remote. Prince Edward County, or "The County" as it's known, moves at its own laidback pace. It's almost as if the construction of the Murray Canal in the 1890s, separating it from the mainland, allowed it a little de Murray damp les anoèes 1880, aver room to dream, to forge an island identity origit, an le coupant du reste du pays, un - and to lot the rest of the world go by. It's a place where people will ask for a ride down the Loyalist Parkway for a few kilometers - like my hitcher did - then hop out and wave a friendly goodbye.

'This is a manmade island,' an amable -+ C'instrune lie ansticielle -, ma confid un habtar tainabinatera que nous passons sur le port à braque à Carrying Place. Neus volta dans une region de l'Ontarig dont l'isolemment secuit. Le Comité du Prince Edward ou simplement - La Contral +, vit a son rythme tranquille, un peu comma si la creubament du Cana endroit propios au rêve, une identité insulare - sam souch de ce qui se passe alleum. Creat un androit cù les gens fant du pouce sans façon pour se andre à Loyaket Parkway - commite c'est to cas



Tourism Magazine - for an airline



French Tourism Publication 2008



In addition, the PSA is barely a kilometre from the town of Picton, a town which Stuart Maclean of the CBC recently described as the most remarkable small town in all of Canada. Unlike many small towns, it has numerous businesses catering to tourists. The ERR makes no attempt to evaluate the impact on

tourism of the BWP's proximity. No visual models were presented to us or to owners of these businesses.

The County boasts five of Ontario's Finest Inns, and two are in Picton. So are several fine restaurants. Based on the "Community Information Session" in August in Picton, we believe that the photo below is close to what the view from one of these fine inns and spas will become.

Picture taken from east of the Claramont Inn and Spa.





We believe that this transformation of the landscape cannot be mitigated by a "visual impact study". The impact is obvious. The noise question – across the water in particular – has yet to be resolved.

Stantec

BYRAN WIND PROJECT

ENVIRONMENTAL REVIEW REPORT

ASSESSMENT OF ENVIRONMENTAL IMPACTS, MITIGATION REQUIREMENTS AND RESIDUAL EFFECTS August 25, 2009

main aspect of the area that tourists found of particular interest was the "beautiful scenery and views", not unlike tourists who may choose to visit the PSA of the Project. When asked whether the presence of wind farms in Argyll made any difference to the likelihood of them visiting the area, 91% of respondents indicated that it made no difference (MORI Scotland, 2002). The Project is expected to have no net negative effect on the tourism industry, and may in fact have a minor positive effect.

With respect to informal recreational use of lands, the Project will, to the extent possible, maximize use of existing roads in the area. In accordance with landowner agreements, access will be controlled so as to discourage trespass on private lands. Therefore the Project is not expected to increase recreational vehicle use in the area or any trespass on private lands.

Sound and visual effects that could be experienced by tourists in the area are discussed in Sections 7.1.12 and 7.1.14, respectively.

7.1.10.1 Potential Effects During Construction/Decommissioning

There may be some net negative effects to tourists during construction resulting from nuisance effects, such as increased traffic volume, noise and fugitive dust. Tourists and local residents in and around the PSA in the wards of Sophiasburgh and Hallowell may experience a temporary disruption in the enjoyment and use of local recreational resources during Project construction due to the short-term effects associated with these nuisance effects.

7.1.10.2 Potential Effects During Operation

There have been a number of studies and considerations of the potential and actual impact of wind farms on tourism. These studies have been conducted in several countries and areas where there has been some concern that tourism potential could be impacted by wind farms, with the common findings being that wind farms have generally little or no negative effect on

Setbacks

The ERR states that the project will use the following setbacks.

- o Residence –550 m
- o Road—200m
- Non-participating Property line—120m
- Watercourse-120m
- Wetland—120m
- Lake Ontario—600m

It proposes to mitigate the visual impact of the project through impact assessments, project planning and existing forest. A Sugar Maple grows to about 30-35 meters. The turbines are 120 meters high. With only 200 meters from the roads, 120 meters from property lines, water courses and wetlands, we fail to understand how the visual impact will be mitigated. No visual representations or models have been presented to the professional community to demonstrate how this might be so.

Incompatible With Official Plan

The ERR recognizes the principle of protecting existing activities, such as aggregate removal, from adjacent incompatible uses. The County's official Plan stipulates that planning for electrical power facilities must consider other relevant official Plan Policies.

Open space uses including outdoor recreational uses and areas, public docking and launching facilities, picnicking and viewing areas.

The PSA contains the Hamlets of North Port and Demorestville. It is the intent of County's Official Plan to protect the County's Hamlets as traditional rural service and commercial centres. Facilities and attractions in Hamlets form part of the **tourism** draw for the County. The predominant uses of land in the Hamlet designation is stated to be a mix of low density residential uses, community facilities such as parks, schools and community centres, dry commercial uses that service the needs of surrounding residents and tourists as well as home businesses and dry industrial uses.

Some areas designated as Aggregate, as identified on Schedule E, recognize existing licensed operations and protect them from incompatible uses. These areas are located east and west of Demorestville.

A Tourism Corridor runs along part of the northeast portion of the PSA and extends outside of the PSA and ends at Highway 5. The northwest portion of the PSA contains two Conservation Areas. One is south of Big Island and runs along the shore of Muscote Bay. The second Conservation Area is approximately 1.5 to 2 km west of Fish Lake. A Scenic Route/Bicycle Trail runs between the two Conservation Areas along the northern portion of the PSA and through part of the Tourism Corridor.

Part III of the Official Plan, The General Development Strategies, include provisions for the development of Electric Power Facilities (refer to Section 2.10.1 of the Official Plan). These provisions indicate that the County will allow development of these facilities in any designation providing that the planning for these facilities has considered other relevant Official Plan policies. Furthermore, the Official Plan stipulates that proponents (public or private) shall consult with the County on the location and siting of such facilities. Currently, there are no further policies regarding power facilities or wind turbines. However, pending a review of the proposed Royal Road wind farm by the Ontario Municipal Board, approved by the County in 2002, County policy is expected to be confirmed following a decision.

The following statement is taken from the Official Plan: "In the future, PEC will be a tranquil and beautiful place to live in and visit. It will be unique from most parts of the Province because of its combination of natural beauty, heritage and rural charm. These special attractions will have been properly preserved and enhanced over the years by the people of PEC."

It is our opinion that the industrial electric power facilities proposed at a height of 120 meters to be located within 200 meters of property lines, and 120 meters from a variety of natural resources that

comprise the visual landscape on which our tourism is based is incompatible with this part of our official plan.

Potential Benefit to Tourism and Property Values

7.1.7.2 Potential Effects During Operation

The operational Project will have a visual impact on the existing landscape. Visual effects associated with any project are subjective in nature and are difficult to quantify. However, as evidenced at other existing wind projects in Ontario, an operating wind farm can act as a draw to bolster local **tourism**. The presence of the Project may act to cause a minor increase in revenue for the wards from tourism activities.

As a result of the Project operating up to 43 turbines, five to ten permanent positions will be created in the community. The estimated increase to the municipal tax base from improvements to the lands on which the Project is located is approximately \$100,000 per year. This will increase the local tax base, which could be used to increase funding of local municipal initiatives. The Project would also provide revenue to landowners with turbines on their land.

Stakeholders have raised the potential issue of a perceived dedine in property values as a result of similar projects. A number of studies have been conducted internationally on this issue. Prior to 2003, there was a general lack of empirical data assessing the impact of wind energy facilities on the economic value of properties decrease within a wind farm or within sight of a wind farm. However, Sterzinger et al. (2003) undertook such a study, statistically testing whether the perception that property values are negatively affected by wind farms is true or false. For their study, Sterzinger et al. (2003) compiled data on every U.S. wind energy development commissioned between 1998 and 2001 that was of a capacity of 10 MW or greater. Property sales records for the area within 5 miles (8 km) of the wind farm were collected for the three years prior to commissioning and the three years following commissioning, to determine if there was a difference between pre-construction and postconstruction property sales. For comparison, sales records were also collected for the same time period from communities comparable to that included for each wind farm. A total of 10 wind

Project No.: 1038669

Tourism +

5-10 Jobs

100,000 in revenue

Revenue for landowners with turbines

7-42

Negative socio-economic effects of the wind farm are anticipated to be minimal. While there are cultural resource activities, aboriginal use, and recreational use of the PSA, it is anticipated that the wind farm will be compatible with these existing land uses. However, many positive effects will be realised. The County will receive approximately \$100,000 revenue per year through municipal taxes, which will provide the County with additional funds for local improvement projects and initiatives that will benefit the entire County. The Project will offer employment and revenue to local workers, and **tourism** is expected to increase as a result of the operation of the wind farm.

The Stage 1 Archaeological Assessment identified elevated potential for archaeological resources within the PSA. These include historic and prehistoric findings. The area has this elevated archaeological potential due in part to its proximity to early transportation routes, historically significant Euro-Canadian settlement as well as prehistoric use of the waterways in and around the northeastem portion of Lake Ontario. In order to ensure the protection of any remaining archaeological artifacts or findings, a Stage 2 Archaeological Assessment will be completed and submitted to the Ministry of Culture to obtain a letter of clearance prior to construction. Stage 2 activities include detailed site inspections and some excavation of specific sites to ensure that no significant sites are disturbed.

The visual landscape of the region will be altered by the presence of wind turbines. The turbines will be generally visible within the Project area and the adjacent lands. However, many of the receptors within the viewshed will be unable to see the wind farm due to obstruction provided by woodlots and other vertical relief such as the rolling topography of the PSA, existing residences, buildings and agricultural structures in the region. Screening opportunities for adjacent residences through tree planting or other measures may be considered where assessment post-

Project No.: 1038669

As previously noted, according to a recent study by Queen's University, our 500000+ visitors per year are drawn primarily by a sense of place – and by businesses that thrive because of that sense of place, celebrating natural beauty and the rural landscape. They come precisely because it does not look like where they live. As turbines are proposed to be installed across the province, how would they increase tourism for the long term? The ERR does not say.

It does acknowledge that the visual landscape of the region will be altered.

Queens University attributed the strong economic growth of our tourist sector to the visual landscape. We do not support it being altered in such a major way in such close proximity to other preexisting and established touristic enterprises and trails.

Impact of IWTs on Tourism in Rural Areas of Natural Beauty

The local tourism economy of Prince Edward County relies on its unique blend of beaches and waterways, agri-tourism, arts and culture, and rural appeal. Unique among many tourist destinations, tourism in the County is not constrained to one or two villages. Whether or not they know the phrase,

10-2

tourists end up delighted by the experience of "going on a horn trip", a journey that takes them around the various roads, bays, and villages of the County. "Touring the County" encompasses the farm gates, wineries, parks, restaurants and views. Visitors can take advantage of all this through the many accommodations in the area, including an extensive array of bed and breakfasts that dot the countryside.

It seems unlikely that the Skypower Wind Farm would have a positive impact on tourism. In fact, several studies demonstrate that tourism visits and revenues are likely to fall.

The Bacon Hill Institute – a public policy research group – studied a proposed wind farm in Nantucket Sound and found it failed the cost-benefit test recommended by the U.S. government for assessing large-scale projects. The wind farm developer stressed the value of wind power as a source of clean, renewable energy. But the study found that the overall economic costs of the project would exceed benefits by \$211.8 million. Without \$241 million from state and federal subsidies, the project would not be financially viable. And while the farm may generate some wind energy jobs, the impact on tourism would result in a net loss of 1,000 local jobs.

Wind farms impact tourism on a very local level. A negative impact is contingent on a number of factors including: the view from accommodations in the area, the number of tourists travelling past the farms, and the perceptions of the tourist demographic specific to a locale (Riddington 2008, 11). This survey, as well as the secondary research reviewed in the study, indicates that social and political attitudes, the kind of activities pursued while touring, and the demographic make-up of the tourist population all inform the possible economic impact, making blanket tourism projections impractical and potentially misleading.

Other research, such as a study¹⁰ by the NFO Worldgroup on tourism in Wales, as well as report¹¹ by The Tourism Company on a past wind farm development proposal in Prince Edward County, point to a close relationship between the perceived visual impact of an industrial wind farm and the potential for a detrimental effect on tourism. Two reports, an independent study by Sustainable Energy Ireland¹² and another for the Nova Scotia municipalities union by Jacques Whitford¹³, specifically address the factors that influence people's perception of a wind farm's positive, neutral, or negative visual impact on the landscape. These reports consistently found that most people are positively disposed to wind energy developments because of their role as a renewable energy source, not their visual appeal. Proper siting was considered a very important factor in lessening or eliminating a negative visual impact.

¹⁰ NFO WorldGroup, "Investigation into the Potential Impact of Wind Farms on Tourism in Wales: Summary Report," *NFO WorldGroup* (2003).

¹¹ The Tourism Company, "Assessment of Potential Impact of Proposed Wind Farm on Tourism in Prince Edward County, Ontario," *The Tourism Company* (2004),

http://www.canhydro.com/projects/royalroadwind/project_docs/EnviroAssessment/RR_Tourism_Final_June_200 4.pdf.

¹² Sustainable Energy Ireland, "Attitudes Towards the Development of Wind Farms in Ireland," *Sustainable Energy Ireland* (2003), www.sei.ie/reio.htm.

¹³ Jacques Whitford, "Final Report: Model Wind Turbines By-laws and Best Practices for Nova Scotia Municipalities," *Jacques Whitford* (2003), http://www.sustainability-unsm.ca/our-work.html.

"Proper siting" is never given a specific meaning by public surveys, highlighting their reliance on the subjective interpretation of the viewer. However, the surveys conducted as part of the studies by SEI and Jaques Whitford, do provide an indication of consistently-mentioned factors perceived as having a negative visual impact. These indicate that people are more positively disposed to the visual impact of turbines when they are not considered to be in areas of scenic beauty, when they are viewed from a distance, and when they are in smaller groups.

Appraisal Group One –an appraisal company specializing in forensic appraisal, eminent domain, stigmatized properties and valuation research --is located in Oshkosh, Wisconsin. They provide appraisal services throughout the State of Wisconsin. In addition, AGO provides forensic appraisal services, valuation consulting and research outside of the state. Recent projects were completed in Ohio, Indiana, Illinois and Michigan.

They recently conducted a study and published a comprehensive report (September 2009) on property values and tourism around wind farms.

They summarize their findings as follows:

"Losing tourism is a major concern of any locale that depends on the allure of their land to attract visitors and support the economy. The success of rural enterprises is inextricablylinked with the maintenance and conservation of a healthy, attractive and irreplaceable rural appeal. Wind turbines are largely seen as a chief threat to such areas.

Rural tourism is big business in the UK (worth appx. \$26.7 billion) and supports up to 800,000 jobs. In a 2006 study, the UK's Small Business Council examined the impact wind farms would have on small businesses – specifically those dependent on rural tourism. They found that 75% of visitors say the quality of the landscape and countryside is the most important factor in choosing a destination. Between 47% and 75% of visitors felt that wind turbines damage the landscape quality. Of the three areas they studied, they found that 11% of visitors would avoid the first area, resulting in a loss of \$48.5 million and 800 jobs. Approximately 7% of visitors would not return to the second area, resulting in a loss of \$117 million and 1,753 jobs. In the third area, just 5% would stay away, but its lost affluence would result in \$668.5 million lost along with 15,000 jobs. In some areas, 49% of all sectors of rural businesses experienced a negative impact.

In a separate tourist area of the UK, five wind farms are proposed totaling 71 turbines along 18 miles. In a pilot survey of 1,500 visitors, the Council found that approximately 95% of the visitors said wind turbines would spoil their enjoyment of the landscape. And this spoiling directly translates into less business from tourism and lost jobs.

They studied another tourist area in the UK, and found that two-thirds of local businesses said turbines are visually intrusive. While 54% thought wind turbines would increase their 'green' credentials, 27% believed it would still have a negative impact on the tourism industry by reducing visitor numbers. After the details of the tower heights were revealed the next year, the 27% grew to 39% who felt the 400-foot-high turbines would make visitors stop visiting completely.

In North Devon, an area renowned for its beauty, a before-and-after survey was conducted to gauge visitors' feelings toward possible wind farms. Before details of their 300' height were revealed, 34% were generally favorable and 66% unfavorable towards turbines. After the size and location of the turbine proposals was revealed, the number of 'unfavorable' visitors rose to 84%. When asked if wind farms would affect their choice of holiday destination, less than 50% claimed that they would still choose North Devon. A further 39% said they would choose North Devon but subject to the size and location of the wind farms. Eleven percent would completely avoid North Devon.

Scotland is also proposing wind farms, but a visitor survey found that 15% of visitors would not return if wind turbines are built – resulting in a potential loss of \$133.7 million and 3,750 jobs.

Wind farms negatively impact pastoral beauty, thus severely damaging rural Vermont's main industry: tourism. Tourists don't want to pay to look at wind turbines, but wind supporters claim the turbines themselves will become an attraction and boost tourism. The wind industry tried making them attractions in the UK, and both failed.

In 1999, a visitors'center was built in Norfolk, UK – then home to one of the largest turbines in the world. It ran out of money and closed in 2002. Then in 2001, a \$9.1 million visitor center was built with hopes of attracting 150,000 annual visitors to its wind farm. Despite opening to much publicity it attracted less than a tenth of projected visitors, and it went bankrupt. Its CEO said, "Sadly, just like many eco-attractions, they're not sustainable; there's just not enough interest.""

The Scottish Government-commissioned report concluded that wind farms can be tourist attractions in the same way that a hydro-electric power station can be; their novelty is an important aspect of their draw;¹⁴ unless wind farms are novel in some way, they will not likely draw significant tourism.

Given this global evidence, we have significant concerns about the negative impact of the proposed industrial energy production facilities, scattered over these 16,000 acres with 43 sites throughout our existing, thriving and expanding tourism segment of our economy.

Despite getting background information from the various ministries, and despite the ready availability of the studies cited above, this report cites no figures for the scale of tourism within the PSA or the neighbouring parts of the RSA. Instead of the specifics of tourism in and adjacent to the PSA, the ERR discusses tourism in general. It quotes selectively from a study of tourism in Scotland without acknowledging the differences in landscape and hence visual impact. It also compares the BWP – with at least 40 turbines -- with smaller projects of 5 turbines in Kincardine and 1 in Toronto and a single larger project of 60 turbines located on the Alberta prairie in an unpopulated area. Without any evidence, the ERR states that "The presence of the Project may act to cause a minor increase in revenue for the wards from tourism activities" (p. 7-42), and it concludes: "As the potential effects of the wind farm are anticipated to have a beneficial effect, no mitigation measures are required" (p. 7-52).

¹⁴ Riddington, Dr. Geoff, et al., "The Economic Impacts of Wind Farms on Scottish Tourism: A Report for the Scottish Government," *The Tourism Policy Unit, Scottish Government* (2008), http://www.scotland.gov.uk/ Publications/2008/03/07113554/0.

Let us restate that in his presentation to Municipal Council, and as reported by the Belleville Intelligencer on July 30, 2008, the President of Skypower, Mr. Adler said that it would offer to pay the county to hire independent consultants to study the proposal — a move that could cost \$200,000 to \$300,000. Adler said the offer was made to show that Sky- Power is willing to work with the community to ensure the project can go ahead. "I think the community needs an independent consultant and we will fund that cost because we don't think the community should have to bear the cost of satisfying themselves and the government of the community that the developer has done a responsible job."

This hasn't happened. Skypower's ERR offers no proper study of the community, evidence of meaningful consultation, evidence for potential the socio-economic impact, or the effect on tourism in either the County or the PSA. These major deficiencies underscore the need for an individual environmental assessment.