



January 20, 2017

Jeff Norman
V.P. Business Development
Algonquin Power Co.
2845 Bristol Circle
Oakville, Ontario
L6H 7H7

Dear Mr. Norman:

Re: Review of Draft Operations Plan Revision 1 – Windlectric Project

Loyalist Township has repeatedly stressed the need for a high level of detail to be provided in the Operations Plan. The details are necessary in order to complete a thorough review of the plan as it relates to protection of the public interest namely minimizing impacts to its residents, protection and maintenance of municipal infrastructure, preservation of Amherst Island heritage, and to ensure continued and effective emergency services during construction.

While it appears several revisions have been made based on our meeting of November 21, 2016, it is disappointing to see the Operations Plan is still lacking in both content and detail. In particular, the Communications Plan, Emergency Response Plan, and Storm Water Management Plan all lack the level of detail necessary to ensure public interests and minimize impacts to the residents of the island.

Details on how emergency services will be fully maintained (i.e. Fire, Ambulance and First Responders) for residents of Amherst Island must be provided. What happens if a truck gets stuck or a piece of equipment breaks down within the municipal right-of-way? Scenarios such as these need to be resolved in advance of construction, to facilitate the development and implementation of the necessary protocols.

The Storm Water Management Plan must address the interruption of sheet flow drainage by the turbine access roads. How will the concentrated flows be managed? Will the downstream outlets be adequate?

Although references to the Pre-Construction Study have been removed, the detail that the references referred to is expected and must be provided in order to complete our

review. As an example, the initial submission noted that 'Detailed engineering of the upgrades required to support the volume of heavy loads will be provided for Loyalist Township approval as part of the Pre-Construction Study.' Deletion of the reference to the Pre-Construction Study does not preclude the need for the information that was to be provided. Detailed information regarding improvements to the municipal road and proposed maintenance procedures must be provided.

Regardless of references, all supporting studies or investigations must be provided to the Township along with the Operations Plan. Included among the supporting documents must be a legal survey plan of all municipal road allowances to be used during construction. The assumption that operations and procedures proposed in the Operations Plan can be completed within the existing municipal road allowance must be confirmed.

The Operations Plan that has been submitted is incomplete as it lacks the requisite detail as defined by the Road Use Agreement. As such, we are unable to offer a complete review. Nevertheless, the following comments have been prepared:

General Comments

Construction drawings which include detailed information regarding proposed works and procedures must be provided. These drawings must include limits of construction and legal limits for all municipal road allowances to be used during construction and shall include existing features (roads, fences, trees, buildings, etc.), proposed infrastructure (turbines, access roads, collector system, etc.) including the location of all road crossings, and dimensions.

Submissions are to include a reference system and dates that allow their differentiation.

Submissions are to include a summary of revisions.

Submissions are to include a schedule of construction activities.

Section 1.0

There is a commitment to relocate the collector system 'side of road' where necessary to reduce the potential for tree root damage. Please clarify 'side of road'. A map of these locations must be provided.

There is a commitment to maintain one lane with a minimum width of 3.0m during Single Lane Restrictions. A map identifying the location of all 'Single Lane Restrictions' and the width of the existing road at the same locations must be provided.

Section 2.0

Potential disruptions to electrical and telephone service must be addressed.

Traffic and Construction Management while winter control is in effect must be addressed. A schedule of work must be provided with the Operations Plan.

Section 2.1.2

The Operations Plan must include a procedure for addressing foreseeable contraventions of the municipal by-law To Prohibit or Regulate the Placing or Dumping of Fill or the Alteration of the Grade of Land in Loyalist Township.

Proposed heavy truck traffic volumes are exponentially higher than current heavy truck traffic volumes. Proposed improvements to municipal roads only discuss widenings and turning movements. The Geotechnical Investigation should recommend improvements to the existing road network in light of the high volume of heavy truck traffic being proposed. The Geotechnical Report must be submitted with the Operations Plan.

Section 2.1.3

This section discusses vehicles pulling over to the side of the road or off the road as a means to 'give way' to residents travelling on any narrow sections of public roads. Without a legal survey plan that identifies the limits of all municipal road allowances, it cannot be determined if this procedure is possible. A legal survey plan of all municipal road allowances to be used during construction, completed by an Ontario Land Surveyor, must be submitted with the Operations Plan.

Section 2.2

The drawings included in Schedule 11 are incomplete. Completed drawings must be provided with the Operations Plan.

Many of the improvements at intersections appear to be outside of the municipal road allowance. The plans must identify the limits of the existing municipal road allowance.

The proposed intersection improvements widen the throat of the intersection significantly. How will these intersections be controlled for use by non-construction traffic?

Section 2.3

There is a discussion about 30-minute traffic closures but there is no indication of how many. If the proponent can't be precise, at least an order of magnitude should be provided in order to form an understanding of how this will inconvenience residents.

There is a discussion of a potential grade adjustment on the Stella Forty Foot Road which is at the location of the St. Paul's Presbyterian Church Cultural Heritage

Landscape. What is the nature of the works? What is the potential impact to this landscape and how can it be mitigated or avoided?

This section notes the main erection crane will be walked down 2nd Concession Road six (6) times contrary to commitment made at PIC. Commitment was that the crane would only cross roads. Details of the impact to the road due to these movements must be discussed in the Geotechnical Report. Any improvements required to 2nd Concession Road to mitigate damage must be identified in the Geotechnical Report and included in the Schedule 11 plans.

Road improvements identified in this section must be included on the plans provided in Schedule 11.

The availability of detour routes is seasonally effected and must be considered when identifying potential detour routes. A schedule of work must be included with the Operations Plan.

There is a concern that road closures and temporary interruptions that occur concurrently will have a severe impact on traffic on the island. Road closures and traffic interruptions must occur at different times.

Section 2.6

Increased heavy truck traffic will have a negative impact on the existing municipal road network. Municipal roads must be reviewed throughout the day in order to monitor the effects of construction. The Operations Plan must include details on the frequency that roads will be reviewed and the procedure that will be followed should construction activities cause municipal roads to deteriorate, in the Township's opinion, to an unacceptable condition.

Section 2.7

Details of the Complaint Response Protocol must be included which includes, but is not limited to, a maximum response time to contact the resident, a maximum response time to address the complaint, and a reporting procedure.

Additional details regarding bicycle traffic are provided in Section 3.3.9 of the Traffic Management Plan (TMP) that appear to contradict statements in the Operations Plan. The details in the TMP are to be reflected in the Operations Plan.

Additional details are required regarding meetings with the school. What is the objective? This section must include a procedure that allows the school liaison to communicate their concerns, other than attending a meeting.

Additional details are required regarding the proposed turn arounds to be provided for school buses.

This section should consider additional details regarding student transportation. How will lane closures and detours affect school bus travel time? When will updates outlining road closures and detours be sent to Tri-Board?

How will agricultural traffic be taken into consideration in the day-to-day construction planning? Farmers may need to be contacted daily. Procedures must also consider the movement of livestock.

A traffic coordinator is mentioned in this section but it is unclear if the position is a continuous position or an intermittent position. Clarification is required to understand whether a traffic coordinator will be employed full-time during construction, both on the mainland and on the Island.

The Township will not provide blanket parking restrictions.

All community events must be included in the Operations Plan.

Section 2.9

This section still discusses operations that may occur outside the time frames set out in the municipal noise by-law. The Operations Plan must include a procedure that will be followed by Windlectric when there is potential for, or it becomes known that, an operation is going to exceed the times set out in the municipal by-law.

The Operations Plan must contain procedures for construction operations during any church services or funeral ceremonies taking place on the Island.

The Operations Plan must be revised to indicate there will be no road closures, lane reductions or traffic interruptions after dusk. Illumination will be required at road closures, lane reductions and for traffic interruptions at, and after, dusk. Section 3.2.3 of the TMP indicates that road closures will not be left in place overnight. Further clarity should be provided to indicate that road closures will be dismantled at dusk.

Section 2.10

Please confirm there will be no blasting within the municipal right-of-way.

Section 2.12

An arborist's report has been provided. However, the actual tree locations were not provided. These locations should be supplied on a map so the impact can be understood. Please confirm that this report includes the trees that may be affected by the proposed intersection improvements.

The Operations Plan must include procedures for the management of emerald ash borer infected trees.

Section 2.13

The chart provided for Cultural Heritage Landscapes fails to identify the tree line as an important attribute of the St. Paul's site, which is articulated on pages 124-125 in the proponent's Heritage Assessment Report. This ties to the tree removal or trimming discussion in Section 2.12. There is no discussion about this as it relates to Stella Forty Foot. Will this occur at this location? If so, how is the damage to be minimized/ mitigated?

Algonquin Power commits to PPV monitoring around Cultural Heritage Resource. Program described in Schedule 17 does not include PPV monitoring around stone fences. Operations Plan must summarize how the stone fences will be monitored and commit to retention of a professional dry stone waller for repairs.

The stone fence at the Pentland Cemetery does not appear to be assessed. Please clarify if it has been assessed and please ensure it is included in the PPV monitoring. It has been drawn to staff's attention that there are reputed burials along the north side of Front Road by Pentland Cemetery.

Section 2.14

A Stormwater Management Report must be provided with the Operations Plan.

A plan showing all impacted fences must be included with the Operations Plan. The plan must also clarify ownership of all fences.

Section 3.0

A detailed Communications Plan must be provided with the Operations Plan.

Section 3.3

Please provide additional details regarding 'On Site Staff'. Will staff be on Amherst Island 24 hours a day, 7 days a week? Will this staff include a competent person able to mobilize staff and equipment to address any issues that may arise?

Section 4.0

A detailed Public Safety Plan must be provided with the Operations Plan.

Has the Fire Chief been contacted for input on the Traffic and Construction Management Plan? Specifically, to confirm a minimum lane width of 3.0m is adequate for emergency vehicles?

Has Emergency Services been contacted to determine procedures for providing emergency service to any areas of the Island that may be cut off as a result of construction activities? i.e. if roads are impassable due to seasonal weather conditions and a road closure is place?

Schedule 2

3.3.2 – The TMP notes that simultaneous road closures will not be permitted and deliveries of major components will be planned to avoid active road closure detour routes. Deliveries of major turbine components will not be permitted and deliveries of large loads must be limited to what is required for activity that caused detour.

3.3.4 - The references to Appendix A and Appendix B are reversed in this section.

3.3.9 – Construction traffic speed limit is 20km/hr within 50m of a pedestrian or cyclist and truck must stay behind bikes or people until it is safe to pass – This must be reflected in Public Safety Plan.

Appendix E – Public Road Modifications – The detail on these drawings is not sufficient to confirm constructability – we have concerns regarding encroachment on private lands, drainage, proximity to water and impacts on guiderails.

Appendix E – Drawing C003 indicates a widening at the intersection for right-turning traffic from 2nd Concession Road to Stella 40 Foot Road. It is unclear what material will be used to construct widenings since 2nd Concession Road is gravel and Stella 40 Foot Road is paved. A more detailed drawing is required to verify proper road design.

Appendix E – Some of the road improvements along South Shore Road are close to the water line and some appear to impact the existing guiderail. What are the mitigation measures at these locations?

Ensure there are no conflicts between the Public Safety Plan and the Site Safety Orientation.

Schedule 8 Public Safety Plan

Detail regarding emergency services and barge operations are insufficient. The Operations Plan anticipates 5-6 trips per day for each barge. How does the Heavy Load Traffic by Road provided in Schedule 3 translate to barge trips? A chart which relates Heavy Load Traffic to barge trips must be provided to assist in assessing potential

impacts to the Township ferry. A schedule of the proposed works must also be provided.

Schedule 11 Public Road Modifications

Several drawings appear to show grading occurring at intersections that affects private properties. In the Traffic Management Report, these appear to be leased lands by the proponent but Windlectric must confirm, including providing copies of the actual leases, the proponent consents to the work.

The detail on these drawings is not sufficient to confirm constructability. The proposed modifications appear to encroach on private lands and impact drainage and guiderails.

Schedule 13 Arborist's Collector System Tree Impact Assessment

Impacts to trees due to access road construction, turbine movements, large equipment movements, and road improvements must to be considered in the assessment.

Schedule 14 Road Closings and Recommended Detour Routes

The Emerald Forty Foot is shown as a major detour route. However, the plan does not discuss seasonal flooding issues and how this impacts the use of this route.

In the Traffic Management Plan provided, the road full closure area identified on South Shore Road appears to be along frontage owned by Martin Hauschild. This owner has put on notice his claim of ownership. While the Township does not agree with Mr. Hauschild's claim, the matter is brought to your attention as there may be others in the community with similar sentiments.

AMHST-240a - The "impacted segment" and "typical working area" includes portions of Stella 40 Foot Road and South Shore Road that Algonquin Power has committed to avoid through use of project road past S37, S27 and S02.

Detours include use of Emerald 40 Foot Road. AP should acknowledge that this is not a year-round road.

Is Schedule 14 reflective of any road closures that may be required for intersection improvements?

Loyalist Township believes that a clear and comprehensive Operations Plan will be of great benefit to all parties, during the implementation stage of this project. Accordingly, we formally request a detailed written response to the matters raised herein, by no later than February 28, 2017.

Yours truly,


Robert J. Maddocks
Chief Administrative Officer

- c.c. Mayor Lowry and Members of Council
- David Thompson, Director of Infrastructure Services
- David MacPherson, Public Works Manager
- Murray Beckel, Director of Planning & Development
- Chris Raffael, Senior Environmental Officer MOECC
- Tony Fleming, Cunningham, Swan, Carty Little & Bonham LLP
- Dan Fencott, Jewell Engineering
- John Foster, Jewell Engineering
- Guy Laporte, Jewell Engineering
- Ariel Bautista, Algonquin Power Co.
- Sean Fairfield, Algonquin Power Co.