



July 19, 2017

Algonquin Power Co.
354 Davis Road
Oakville, ON
L6J 2X1

Attn: Ariel Bautista, Senior Project Manager

Dear Mr. Bautista:

Re: Review of Draft Operations Plan Revision 6 – Windlectric Project

Comments

The following is a summary of Loyalist Township's comments on the July 12th submission of the Draft Operations Plan. The July 12th submission needs to be updated to reflect the proposed survey protocol.

Windlectric should submit revised schedules. Any further revisions to schedules need to be noted and redlined.

Section 2 TRAFFIC AND CONSTRUCTION MANAGEMENT PLAN

- **2.1 Haul Routes for Oversized and Heavy Loads**
 - **2.1.1 – Major Turbine Component Delivery Routes**
 - References to turbine S12 should be removed.
 - **2.1.2 – Heavy Load Delivery Routes**
 - Windlectric confirms that spoils from turbine base construction will be managed on site, but they have not discussed excavated material from road improvements and collector system construction; where will this material be managed? Have these loads been considered in Schedule 03? Please address these questions specifically in the operations plan.
 - **2.1.3 – Other Large Transports**
 - Paragraph 1 – if roads are not adequate to facilitate movement of over width equipment, these movements will be completed through a 'Traffic Interruption';
 - Paragraph 2 – movement of the erection crane(s) will be handled as a 'Road Closure';

- **2.2 – Public Road Modifications**

(The comments below do not reflect any modifications made in the July 19th submission; these will be addressed under separate cover.)

Contents of this section should generally reflect the most recent discussions between the Township, their solicitor, and Algonquin. The proposed improvements for trunk roads shall be applied to all roads to be used by Algonquin. Loyalist Township and their consulting engineer are now reviewing the geotechnical report received today, to confirm the final road design.

The details of the pre-construction road improvements and the schedule for the road improvements, including installation of the collector system, must be detailed in the Pre-construction Plan.

- **2.3 - Public Road Closures and Delays**

- 'Traffic Interruptions' are still road closures and must be handled as such in regards to the Communications Plan and emergency services
- Although the hard-topped roads are believed to be adequate for the proposed construction traffic, the Operations Plan should include proposed maintenance.

- **2.5 - Navigable Waters**

- Marine Logistics Plan has been referenced.

- **2.6 - Road Maintenance**

- Section contains references to several different people; statement has been added that references the Communications Plan
- Algonquin has committed to use Granular A for road construction and maintenance. Plan should specify that crushed, quarried material must be used
- The Pre-Construction Study has identified roads that have insufficient structural adequacy. These roads should be improved based on the recommendations of the Pre-Construction Study, prior to being subjected to heavy truck traffic
- Under the heading Structural Road Maintenance Procedure, wording should be revised as follows: If, at any time, segments of gravel roads are determined, either by the Township or Windlectric, to have failed due to the fatigue loading of the construction traffic, reestablishment of the road structure will be executed in accordance with specifications established by the Township's engineer or designate, on a site-specific basis.
- Please amend all references to "Transportation and Solid Waste Manager", to be replaced by "Public Works Manager".

- **2.6.1 - Winter Conditions**
 - Algonquin will ask Loyalist Township Council to enter into an agreement with respect to additional winter maintenance requirements resulting from this project.
 - Please add the following statement: “Algonquin will be responsible to obtain the necessary approvals from all agencies with respect to a snow dumping area, prior to any snow being placed in this area.”
- **2.7 - Impact Mitigation**
 - **2.7.3 - Student Transportation**
 - Additional details should be provided on the ‘turn-arounds’ – buses to execute a 3 point turn.
 - The operations plan references beginning at 9 am after student transportation has completed morning runs. The plan does not reference how impacts to afternoon student transportation will be mitigated. Algonquin needs to describe this as well.
 - **2.7.8 – Wells**
 - Loyalist Township has previously advised Windlectric that we have limited information on service lines in the road allowance. This should be stated in the Operations Plan.
- **2.11 Road Dust Control**
 - If a nuisance situation occurs with respect to dust, Windlectric will consider the application of calcium chloride at the request of Loyalist Township.
- **2.13 - Cultural Heritage Features**
 - 2450 South Shore Road is listed as a Built Heritage Resource (but not in the original REA Condition M1 as this property was added as a result of REA Amendment 4); Schedule 17 (Cultural Heritage Feature Monitoring Program) discusses monitoring in relation to the nine Built Heritage Resources identified as requiring protection under section M1 of the REA; confirm that 2450 South Shore Road is included in the Cultural Heritage Feature Monitoring Program; **2450 South Shore Road has not been added to Schedule 17**
 - Cultural heritage landscapes and built heritage resources are all listed. The dry stone walls need to be listed here as well.
 - It was requested in previous comments that a commitment be made for the retention of a dry stone waller if repairs are required on the stone walls. The March 15, 2017 table of responses from Algonquin indicated that the following statement would be added in the Operations Plan “Should project activities cause damage to a stone wall, repairs will be carried out by a qualified and professional dry

stone wall mason.” This sentence has still not been added (currently states will be repaired by a qualified professional).

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- **2.13.1 General Preventative and Mitigation Efforts**
 - Location of heritage features should be identified on the construction drawings
- **2.14 - Drainage, Grading, and Fences**
 - Limits of the road allowance need to be established with a legal survey prior to moving any fences, for properties where permission from the owner is not provided in advance.
 - All proposed culvert reinforcement must be detailed in cross section in the pre-construction drawings.

Schedule 02 TRAFFIC MANAGEMENT PLAN

- **2.1.2 - Modifications to the Public Roads**
 - Schedule 2 needs to be updated to reflect the changes being made in Section 2.2 of the Ops Plan
- **2.4 - Types of Construction Vehicles**
 - Definitions need to be updated to reflect the definitions in the Ops Plan

Schedule 03 HEAVY LOAD TRAFFIC BY ROAD

- The Operations Plan should explain why the number of heavy loads have been reduced significantly
- This section should address the Township’s comments provided above under 2.1.2., with respect to excess materials excavated from collector system trenching and pre-construction road improvements

Schedule 04 SITE SAFETY ORIENTATION

- Safety measures included in the Operations Plan and Traffic Management Plan should be included in this document

Schedule 08 PUBLIC SAFETY PLAN

- Document needs to be consistent with the Operations Plan, Traffic Management Plan, and Site Safety Orientation document
- Detour routes must be confirmed prior to commencing work

Schedule 09 EMERGENCY RESPONSE PLAN

- The directions on the top of Page 29 of the Emergency Response Plan should read as follows:

“In an emergency, dial 9-1-1 to access fire, police or ambulance, and identify yourself as being on Amherst Island in Loyalist Township. Loyalist Township Emergency services can be contacted directly at 613-548-4001 – 0 for accident or spill reporting.”

- The Emergency Response Plan cannot be approved until Algonquin Power have identified a High Angle Rescue Contractor on page 30.

Schedule 17

- 2.1 – PPV monitoring is only described under 2.1.2 Cultural Heritage Landscapes – the Built Heritage Resources section (2.1.1) and the Dry Stone Walls section (2.1.3) only speak to “monitoring.” Please state in these two sections that when construction activity is within 50 metres of these resources, that **PPV** monitoring will occur.
- 2.1.3 – States that if no construction activities are within 50 metres of the dry stone walls, then no monitoring will be required. REA Condition M6 requires ongoing monitoring of their condition and to assess and evaluate their condition after the completion of construction activity. Monitoring is therefore still required even if construction activity is not within 50 metres (PPV monitoring is not required if not in the 50-metre buffer as per M3 but visual monitoring should still be occurring). This needs to be stated.
- 2.1.4 – Dry stone walls identified in Road Use Agreement – please state that when construction is within 50 metres of these walls that **PPV** monitoring will occur. These stone walls should have the same protection as the stone walls identified in Condition M. The Operations Plan also states that if not within 50 metres of construction, no monitoring will be required. Visual monitoring still needs to occur if not within 50 metres, particularly since 5 of those stone walls are designated under the Ontario Heritage Act. Any damage needs to be prepared by a professional stone waller.
- 2.1.5 – This section only speaks to monitoring the dry stone walls. 2450 South Shore Road is a built heritage resource - ensure that this is included in the monitoring as well (if within 50 metre buffer). **PPV** monitoring also needs to be stated.
- 3 – Technical Support – M4 of Condition M indicates that acceptable vibration levels shall be determined for each cultural heritage resource within the 50 metre buffer by a Qualified Independent Structural Engineer with previous experience working with built heritage under similar circumstances. The comment was previously made to confirm that the engineer had this experience. The bio for Paul Walkington was revised in the last submission indicating projects worked on with built heritage under similar circumstances. The July 12th submission no longer includes Paul Walkington

on the project team and the current project team's bios do not indicate this experience.

A further letter reviewing your July 19th submission will follow, after review by Loyalist Township's staff and consultant.

Yours truly,


Robert Maddocks
Chief Administrative Officer

CC: Dave Thompson
Murray Beckel
David MacPherson
Andrea Furniss
Loyalist Township Council
Tony Fleming, Cunningham Swan
Dan Fencott, G.D. Jewell Engineering
Guy Laporte, AECOM (retired)