

I am writing to request that you do not issue Gilead Power a permit to build the wind energy project at Ostrander Point. As I understand the regulations under clause 17(2)(c) the Minister may only issue the permit if: "(i) the Minister is of the opinion that an overall benefit to the species will be achieved within a reasonable time through requirements imposed by conditions of the permit..."

The Registry entry then goes on to list four activities that will purportedly more than balance the destruction the endangered species' habitat at Ostrander Point. These four are:

- 1) Proponent to acquire and manage a property outside the project area (that meets appropriate criteria as defined by the Ministry of Natural Resources) for the habitat preservation, rehabilitation and/or improvement of both Blanding's turtle and Whip-poor-will.
- 2) Publication of Whip-poor-will survey methodology and the results of pre-construction monitoring.
- 3) Financial support to fund graduate research related to Whip-poor-will for one of the following subjects of interest: variation in nesting success rates with proximity to turbines, variation in fledging dates with proximity to turbines, variation in territory size with proximity to turbines, foraging behaviour differences in response to turbines, and site fidelity. This research would be peer-reviewed and published.
- 4) Beyond standard species monitoring, a benefit to the species will be achieved through value added monitoring for multiple years on both the newly acquired property, as well as the windpower site, to gather new information and knowledge about Blanding's Turtles and how they use their habitat. Value added monitoring being considered includes; successful techniques and methods to restore damaged Blanding's Turtle habitat, movement patterns between life-cycle sub-habitats such as hibernation and nesting. Other value added monitoring efforts are being considered by Gilead and will be agreed upon with the MNR district. Reports summarizing monitoring results will be submitted to MNR annually.

Aside from the ill-defined actions in the first item, none of these activities will benefit either of the endangered species. It may be desirable to learn as much as we can about the behaviour of these species but exactly how does that knowledge, gained in a very costly manner, help the species themselves? Even if there was a firm and funded program to put that knowledge to use the success of such an undertaking would be problematical - how many habitat-building programs have been completely successful, especially over the longer term? But in this case, there is no firm and funded following programs even suggested. Without that commitment from the start it is highly likely that no actions will ever be taken that might make use of whatever knowledge is gained, and no benefit will accrue to the endangered species, as required by the regulations.

The first item at least holds out the promise that maybe some new habitat will be acquired, but without an actual plan and escrowed funding it is unlikely to ever happen. I can confidently predict that once the project is built a few mostly-forgettable reports of little value will be generated (much like the raptor mitigation study on Wolfe Island), no suitable replacement habitat will be found, and the entire habitat-replacement program will soon be forgotten about. Except that the now-excellent habitat at Ostrander Point will be forever destroyed.

Please do not turn over this extraordinary habitat to a private corporation to be plundered for their benefit alone.