



Township of North Frontenac

Proposed Wind Turbines Position Paper

Ronald J Higgins, Mayor

North Frontenac Township

"It is ironic that the Ontario government would consider destroying this environment as part of plan to save the environment. Places such as this cannot be replaced."

North Frontenac Taxpayer

6648 Road 506

Plevna, Ontario K0H 2M0

Tel: (613) 479-2231 or 1-800-234-3953 Fax: (613) 479-2352

www.northfrontenac.ca



Distribution:

Premier of Ontario	North Frontenac Lake Associations Alliance
Minister of Municipal Affairs and Housing	Frontenac News
Minister of Economic Development, Employment and Infrastructure	Kingston Whig
Minister of Agriculture, Food and Rural Affairs	Ottawa Citizen
Minister of Energy	Ottawa Sun
Minister of Natural Resources	Toronto Sun
Minister of Tourism Culture and Sport	Globe and Mail
Federal Minister of Environment	Toronto Star
Mayor of Lanark Highlands	CTV News
Mayor of Central Frontenac	CBC News
Council of Addington Highlands	Global News
Mayor of Greater Madawaska	Chief Doreen Davis
Warden of County of Lanark	Residents and businesses in North Frontenac
Warden of County of Lennox and Addington	
Warden of Renfrew	
Council of County of Frontenac	

Contents

1. Introduction.....	4
2. Summary.....	4
3. Industrial Wind Turbine Proposal.....	5
4. Our Evaluation.....	6
5. Background Analysis.....	9
6. Root Cause.....	15
7. Conclusion.....	16
8. Actions.....	16
Appendix A - About North Frontenac.....	17
Appendix B - North Frontenac’s Future.....	19
Appendix C - Resident Comments – A Sampling.....	22

1. Introduction

The Township of North Frontenac is lower tier municipality within the County of Frontenac. Details of our Municipality can be read in [Appendix A](#).

In March of this year we were very surprised to learn that our Township was designated as a potential industrial wind turbine (IWT) farm site for one (1) project called Northpoint I, consisting of up to 50 turbines. Our neighbour, the Township of Addington Highlands had been approached regarding up to 100 turbines for Northpoint II. In June we learned that the project now would include a portion of Northpoint II. Northpoint II was revised and now has seven (7) turbines to be erected in North Frontenac as part of the Addington Highlands project¹. Unknown to us the proponent has been in the area for about two years conducting wind studies and securing land agreements. The deadline for an RFP proposal submission, as required by the IESO, is September 2015. The proponent gave us a deadline of July 18 to provide a letter of support, a resolution agreeing to the two projects and a signed road use agreement. Having only a few months to study this proposal and its implications it has put a great deal of pressure on us, when the Province and the Proponents have been working on this for two years or more. After reaching our decision to not support this project, and declare ourselves as unwilling hosts, I felt compelled to conduct more research on how this came about and to address our concerns. To that end I am providing this position paper in the hopes of entering into consultation with our Provincial government to have this whole issue addressed.

We need to make it clear that North Frontenac is not against renewable sources of energy. Smaller scale wind, or solar versus IWT's, or hydroelectric could be an option that fits into our strategic plans and economic vision. If we had been consulted by all parties before presentation of the industrial wind turbine projects this situation, that we are in today, could have been avoided.

2. Summary

My hope is to meet with the Ontario Premier and the Minister of Energy to discuss our options, and to determine what rights and input the tax payers and municipalities of Ontario indeed have. Over the past several years we have been working quite diligently developing a strategy and a vision for our municipality that will someday raise us up from the ashes of the devastating economic downturn that happened a few years ago. We have identified vision identifying the unique characteristics of our community that will help us do that.

We have been forced to absorb downloaded services from the Provincial government; the most recent, and not without significant cost, was regarding OPP services. Absorbing these costs has put a tremendous burden on rural municipalities from a financial perspective and

¹ The Proponent has stated that they intend to move all Northpoint 2 back to Addington Highlands but as of the date of this report the project site map still shows 7 wind turbines for North Frontenac.

straining our limited human resource bandwidth, yet we have worked out a way to manage this issue while maintaining a high quality of service delivery for our residents.

Our geography and terrain is not farmland, which seems to be the most common location for installations such as these. We are rich with a unique, pristine natural beauty, mixed crown land and private forests and are proud to be included in the Land O'Lakes community. Our area might be large geographically but is small in population. With a year round population of approximately 2000, seasonal population bumps us up to approximately 8000. We need to, we must, continue to grow and nurture our tourist industry as well as our residential population. The focus of our Long Term Economic Development Plan is to enhance our services and expand our infrastructure to bring new tourists to our beautiful location. We have provided 921 building permits in the past 7 years, and hope our efforts increase that exponentially. The main focus of not supporting these projects is based on economic development that does not disrupt our unique and pristine landscape.



3. Industrial Wind Turbine Proposal

The following was presented to North Frontenac Council on June 6, 2015 by the Proponent.

Highlights of Potential Projects

- Northpoint I - North Frontenac, north of Plevna
 - Up to 50 turbines
 - Mostly Crown Land, entirely in North Frontenac
 - ~9 km Transmission Line
- Northpoint II - Addington Highlands and North Frontenac
 - Up to 100 turbines with 7 in North Frontenac
 - Split between private and Crown lands
 - ~23 km transmission line connecting to Northpoint I substation
 - ~48 km potential alternate transmission line

Potential Economic Benefits (Northpoint I)

- Municipal Property Assessment (MPAC)
 - Total Annual Property Taxation – estimate ~ \$146,000
- Infrastructure Upgrades (typically covered in a Road Use Agreement prior to start of construction) – Roads, bridges, culverts, etc. carried by the project
- Employment
 - 6 to 10 full-time permanent positions at the project site, hundreds of temporary construction jobs
- Operations & Maintenance Building
 - 5K sq. ft. minimum with associated taxes, etc. located within 20 min. drive of the site
- Proposed Community Benefits Agreement

- Funding for recreational / sustainability / community projects; based on installed project infrastructure in municipality

Requested Documents

They were asking Council to enter into three agreements regarding Northpoint I and II

- Municipal Support Resolution from Council
- Community Benefits Agreement
 - \$1,750 per installed MW of generating capacity (\$175,000/year for 100 MW)
 - \$1,750 per kilometer of transmission line installed in municipal rights of way
- Road Use Agreement
 - Outlines the project's responsibilities regarding road maintenance and upgrades

4. Our Evaluation

To evaluate this proposal we looked at the following;

1. Economic benefit
2. Road infrastructure
3. Deforestation
4. Scenic beauty
5. Wildlife
6. Potential for wind turbine fires
7. Devaluation of property (which has already started)
8. Decommissioning of turbines after life expectancy
9. Residential infighting
10. The wishes of all our residents
11. Our strategic vision or our direction/intent for economic development and resident attraction.
12. Impact to our Dark Sky Preserve
13. Does Ontario really need this type of power generation?

To evaluate this project properly we felt we needed to ensure all aspects were evaluated and the following is our results of that evaluation.

1. **Economic Benefit** – The projected tax revenues and the community vibrancy fund was a very tempting offer. However when you analyzed this in detail the Township would only receive \$42K in taxes and the rest would go to the County and education. The community vibrancy funds being offered would not all go to the activities listed and most would have to go to the residents and cottages that would have devaluation as a result of having the wind turbines in their backyards. In trying to determine facts on this the MPAC results showed no devaluation, yet when you speak with those who have had properties next to wind turbines, or to real estate agents we found they could not sell, or those looking to buy would not come to an area with wind turbines. This raised a **major concern** for me. How can MPAC not show a decreased tax rate when there is

clear evidence the properties have suffered devaluation? We already have a home owner who is trying to sell in that area and when this issue came about and all interest in the property disappeared. The only good thing we came up with in regards to the proposal was possible short term employment for local contractors to build roads and assist with ground preparation for the turbines.

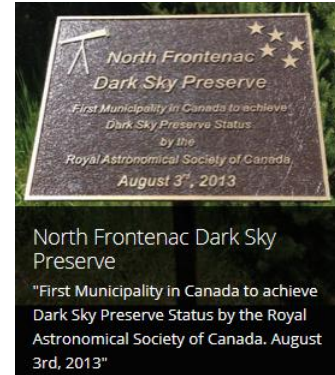
2. **Road Infrastructure** – Our Township is set in gently rolling hills and thousands of lakes, streams and wetlands. In looking at the size of roads required this would have been very destructive to our ecosystem and natural beauty, the things we are trying to promote.
3. **Deforestation** – Besides the road systems we would also lose approximately 3 acres per wind turbine and a large amount of acreage for transmission lines. Trees are a valuable commodity for our landowners and visitors not to mention the disruption to wild life.
4. **Scenic Beauty** – This criterion would be totally devastating if wind turbines were erected in our Township. It is one of the basic criteria for our economic development activities. In addition turbines would destroy the scenic beauty for the residents and cottagers in the area of the projects.
5. **Wildlife** – We have an abundance of wildlife in our Township and have 30 species at risk included in our wildlife inventory. In addition we have had sightings of cougars in our Township and although not on the list of species at risk, we believe them to be endangered.

The evidence is documented about the destruction of birds and bats. We find this is totally unacceptable and the brown bats that are suffering decline due to white nose syndrome do not need another factor having a negative impact on their population.

6. **Potential for Wind Turbine Fires** – This was a concern for us based on the crown lands in the area and the fact that we do not have the equipment to perform high angle emergency rescue. Although the Proponent did indicate that they could be equipped to do this, we still have the concern of forest fires as a result, and the long-term impact of our scenic and pristine environment being destroyed by fires.
7. **Devaluation of Property** – Covered under economic development
8. **Decommissioning of Towers** – In our evaluation, we saw numbers from \$450K to \$1M to decommission and return the land back to its original state. We were quite concerned on this item and although the Proponent stated they would cover that cost they indicated that they would not provide a security bond to cover the costs.
9. **Residential Infighting** – The projects have caused an upheaval in our peaceful community. The lure of having another source of income from a wind turbine(s) being erected on their property led many to sign agreements with the Proponent. We have heard that some did so without seeking legal opinion and as result have – best described as – significant liens on their properties. All in all, this has been disturbing to the residents and in some cases is causing rifts. We have also heard some instances of ‘buyer’s remorse’. We clarify that we have no issue or involvement with a resident’s

personal decision. We also know that without doubt we do represent the majority on this issue.

10. **Majority of Residents Opposed** - The majority of the residents spoke out loud and clear about not having IWT's in the Township. Not much was heard from those who signed leases as there was "apparently" a clause in the agreement that does not allow them to talk about it. *Please see [Appendix C](#) for a sample of comments we have received in writing.*
11. **Our Strategic Vision** – This type of industrial project does not fit into our strategic plan or economic development strategies for North Frontenac.
12. **Dark Sky Preserve** – We have the first, and only, municipal dark sky preserve in Canada as designated by the Royal Astronomical Society of Canada, and are very proud of that distinction. It was put in place when we realized that one of our greatest environmental attributes was our dark skies. We have Astronomers, Astro Photographers and amateur astronomers come to our municipality for the opportunities we provide in this regard. Impact unknown at this time.
13. **Is the Power Needed?** – It has been documented that Ontario has a surplus of power and sells excess power to Quebec and to the U.S. The technology is not available to store excess power so existing power plants still need to be maintained.



After evaluation of the above we determined that the negative and the unknowns far outweigh the benefits being offered, outright or inferred. Providing an agreement before knowing the following bullets did not make sense as it is not the way you go about approving a development project.

- Project Description Report including Description of Potential Environmental Effects
- Natural Heritage & Environmental Impact Study
- Assessment of Species at Risk
- Wetland Study
- Construction Plan
- Design & Operations Plan
- Decommissioning Plan

The taxation revenue that we might have benefited from was tempting to us as we are hard pressed to keep taxes in line with overall rising costs in general. And with provincial downloading of services to our tier, we could face more burdens to absorb those additional costs – and who knows what we will be faced to take on next? For this current taxation year we have just incurred a \$139K² due to downloading of Ontario Provincial Police costs

² Effective January 1, 2015 the Township of North Frontenac saw an increase of approximately \$139,000 per year until 2018 and then an additional \$58,000 in 2019. In 2019 it will cost approximately \$845,000 for policing, an increase of \$615,000 over 2014, or more than 300 per cent increase over 5 years. Cost per household; in 2014 the

for a total of \$814K by year 2019. To make sound decision based on the project alone, and exclude the financials, this project proposal does not make any sense whatsoever for our plans and vision for the community.

Our staff resources are already stretched to the maximum and we have had to look at sharing services with our neighboring municipalities and townships. We are more than comfortable that we looked past the dollar temptation and took the time to conduct full analyses; which ultimately lead to our decision to not support this project and as a Township to declare ourselves as Unwilling Hosts.

We also weighed this new revenue source (Community Vibrancy Fund) against the likelihood of property evaluations going down due to homes and cottages being in the sight lines of the turbines, and visible along our scenic routes and interior camping. It became clear that much of these funds would need to be applied to our budget lines to cover the loss in taxation for those properties where their property values declined. So basically there would be no gain whatsoever. In addition the Proponent stated the spending of the fund would require their approval for what projects the money could be spent on but were not forthcoming about the approval criteria.

The decision became easier the more we learned. This was a unanimous decision when the vote was put to Council by Resolution, and is recorded as such. Our tourism slogan is “Four Seasons, More Reasons” and we are working very hard to promote the tourism industry and Industrial Wind Turbines do not align with our vision and mandate.

But declaring that we are Unwilling Hosts it is simply a statement at this time and does not mean that the proposed project comes to an end. The Green Energy Act opens the doors to our resolution being discarded and the Proponent could still go ahead with this project if they were to win the contract. By declaring ourselves as Unwilling Hosts it only affects one segment of the weighting factors Independent Electricity System Operator will face when conducting due diligence on the proposal. We feel that the majority consensus of our residents should carry significant weight. We refused to be swayed by the offer for ‘gifting’ of additional funds coming into the coffers if we ‘played nice’. In fact, this ‘gifting’ not only annoyed us, but we learned that it was not as lucrative as suggested.

5. Background Analysis

A background analysis was required to understand what brought this issue to North Frontenac in the first place. This analysis started with the Proponent’s proposal and I followed the process through to understand what the root cause of this issue really was. “Why did the Proponent come here and think they could install IWT’s in North Frontenac and our neighbouring municipality of Addington Highlands”? The answer turns out to be as

cost per household for Police services was \$66.56 which will increase by \$40 per household each year for five years reaching a cost of \$244.17 per household for police services.

a result of a request for proposal (RFP) from the Independent Electricity System Operator (IESO). The RFP content did not tell us why they selected North Frontenac so we reviewed the IESO and Ontario Energy Board (OEB) websites. We eventually determined that our areas were selected years ago to establish industrial wind farms in our part of Eastern Ontario and that Crown Lands were now selected as potential sites. This is a huge **major concern** based on the fact that we rely on Crown Lands in our municipality for our economy, as mentioned earlier in this report. As it turns out, the Proponent established wind monitoring stations here two years ago without informing the Township. In addition the IESO and the Ministry of Energy did not engage the municipality about their plans. As well, we are hearing stories from the residents that the Proponent was approaching landowners in the area to sign lease agreements for quite some time.

So now we understood why the Proponent came here, and now we needed to understand why the Proponent and IESO selected North Frontenac. We could not find any factual information in this regard other than learning that Crown lands are now being targeted. I can only assume that we are targeted due to the fact that we are a sparsely dispersed community with low residential voting power, with lots of available land and that we could probably use the economic stimulus as a boost to our local economy.

This led me to research the Government of Ontario website so that I could address my concerns. The following are some results of my research.

Province Of Ontario Statements and Mandates

October 27, 2014 Ontario Premier Kathleen Wynne released the following statement on the municipal elections that took place today across the province: *“I would like to congratulate tonight's successful candidates. I wish you all the best as you begin the important work of **representing your constituents**. I look forward to the progress we will make for people as **we work together** over the next four years.”*

As a result of our declaration we have represented our constituents and the Premier needs to honour her commitment of representing the constituents and ensure we have her support. I have not been approached by any Provincial ministry to work together on any initiatives or plans for our municipality.

Premier's remarks at the 2015 OGRA/ROMA Combined Conference – *“As an MPP since 2003, I have seen the value of a provincial government that puts a rural lens on its decision-making - and the challenges created when that lens is overlooked, as it has at times been. For example, we know that modern infrastructure is key to being competitive in the global economy, and to driving growth here at home.” **That is no less true across rural and urban boundaries, but it can mean different things.***

I have not seen any evidence of a rural lens in our municipality, unless that means forging ahead with the Energy plan at the expense of rural municipalities. The comment related to be meaning different things across urban and rural municipalities is fact. An example is

related to the Provincial Policy Statement 2014, section 1.1.3 Settlement Areas, states "Settlement areas shall be the focus of growth and development, and their vitality and regeneration shall be promoted." This does not consider the health and safety of our residents as we do not have the municipal services required to support this. Wells and septic systems would be concentrated in settlement areas such as 5-6 dwellings per acre, all with individual wells and septic systems. This another example whereby our municipality needs to be consulted with to ensure good land use planning principles are addressed before forging ahead.

December 11, 2014 Building Ontario Up – Premier quote *"I am proud of the progress my government has made during this very productive session. We are putting into action our **economic plan**, and demonstrating how the four pillars of our plan are working together to support growth, create jobs and ultimately improve the quality of life for people across the province."*

The Wind Turbine project undermines our quality of life and our economic strategies for tourism. An economic plan needs to ensure consultation before implementation and would include a discussion and agreement on other renewable energy option other than IWT's.

The monies spent to subsidize IWT proponents and wind farms could be better spent to help us with economic development. Home based solar is becoming economically viable and much more practical. By providing monies to support residential solar installation it would be much more effective and useful and will meet the green energy requirements.

2014 Mandate letter: Municipal Affairs and Housing Premier's instructions to the Minister on priorities for the year 2014. *Strengthening Partnerships with Municipalities. Continuing to apply a municipal lens to decisions made across government, ensuring the impact on municipalities is carefully considered. **Continuing to facilitate the strong relationship between the province and municipalities**, including the ongoing implementation of the Memorandum of Understanding with the Association of Municipalities of Ontario (AMO), as well as the Toronto-Ontario Cooperation and Consultation Agreement. You will consult with AMO and Toronto on matters of mutual interest. **Working with municipalities outside of these formal agreements to ensure their perspectives are also heard.***

I have not yet seen or heard anything in regards to working with municipalities outside of organizations like AMO. You would think something as important as wind turbines and other major plans that affect our municipality would have been discussed with us at the municipal level long before now.

2014 Mandate letter: Economic Development, Employment and Infrastructure Premier's instructions to the Minister on priorities for the year 2014. *Continuing to work with partner ministers and industry to explore initiatives to reduce regulatory and administrative burdens, as proposed in the Better Business Climate Act, 2014. If the legislation is passed, I ask that you begin to work with key partners to develop regional cluster plans. **Your goal is to adopt smarter regulatory practices without putting public safety at risk.***

What about the Green Energy Act? It does not appear to be a regulation that takes the health and safety of the public into consideration.

Section 3.0 of the Provincial Policy Statement states: "Ontario's long-term prosperity, environmental health and social well-being depend on reducing the potential for public cost or risk to Ontario's residents from natural or human-made hazards."

This is the clause that the Provincial government is using to try and deny development on private lanes using the rationale that it is for the health and safety of the residents. Our question is what about the health issues with IWT's? Has there been extensive research to determine any long term effects? We all know that this has not been studied extensively to reach conclusions but we also know that history shows that people have suffered health related issues in this regard.

Developing strategies for key-growth sectors, such as advanced manufacturing and automotive, agri-food, cleantech, financial services, information and communications technology, natural resources, tourism, media and culture. Together, these strategies will represent the government's broader economic policy objectives and will support investment and job creation. I ask that you work in co-operation with partner ministers, industry, postsecondary institutions and the not-for-profit sector to develop these strategies.

Tourism will be greatly impacted with industrial wind turbine farms. Tourism is being touted by this government to be a key factor for improving economic growth in our area. There does not seem to be a balance, or strategy, to implement these strategies in a cohesive manner amongst the Provincial ministries themselves.

2014 Mandate letter: Agriculture, Food and Rural Affairs Premier's instructions to the Minister on priorities for the year 2014. *Fostering Vibrant Rural Economies – Working with ministers and partners to continue to engage with rural stakeholders, deliver effective programs – such as the Rural Economic Development Program – and services to rural areas, and move forward with the Rural Roadmap.*

All reports by this ministry are related to food and agriculture and nothing related to rural economic improvement outside these two focus areas.

Ministry of Energy - Championing Renewable Energy. *Continuing to lead our government's commitment to renewable energy, with the aim of having 20,000 megawatts of renewable energy online by 2025. You will continue to monitor progress toward targets for wind, solar, bioenergy and hydroelectricity as part of Ontario energy reporting.*

Continuing to work with the ministry's agencies to implement a new competitive procurement process for renewable energy projects larger than 500 kilowatts that will take into account local needs and considerations.

Continuing to respect the contracts that have been signed with energy producers, while always ensuring that these contracts enable the delivery of sustainable, affordable energy to Ontario's ratepayers.

*Working with the ministry's agencies and with **municipal partners to ensure that municipalities participate meaningfully and effectively in the decision-making process for the placement of renewable energy projects, including wind and natural gas.***

Ensuring that timelines for meeting the LTEP's energy storage procurement targets are met and that they address the regulatory barriers that limit the ability of energy storage technologies to compete in Ontario's electricity market. As well, you will explore opportunities to build on the pilot projects through additional procurement.

Clearly, not being included in the early stages is in direct violation of this Minister's mandate, ensuring that municipalities participate "meaningfully and effectively" in the decision-making process for the placement of renewable energy projects, including wind and natural gas. As mentioned before we are not against renewable energy but feel solar is a more palatable option.

IESO procurement process is flawed as it allows projects to begin the procurement process before studies and assessments are completed. It utilizes the Green Energy Act to override the municipalities land use planning which strips away our municipality's democratic rights and our elected officials own and collective responsibilities to our constituents as mentioned by our Premier. There is no collaboration by the ministry with municipalities to make them aware of target areas for energy options and sites. It pits a proponent against a municipality and puts both parties at a distinct disadvantage.

Ministry of Natural Resources - Implementing the Endangered Species Act. *I ask that you continue to implement the act in a way that protects and promotes the recovery of species at risk in Ontario.*

We have 30 species at risk in our Township.

We have the following endangered species at risk in our Township; Golden Eagle, Henslow's Sparrow, King Rail, Loggerhead Shrike, Blunt-lobed Woodsia, Butternut, Pale-bellied Frost Lichen, Five Lined Skink and the Grey Rat Snake.

This ministry is agreeing in principle to allow wind turbines on Crown Land. It is in conflict with our North Frontenac Crown Land Stewardship Program and does so without any municipal consultation whatsoever. More details of this program are provided in [Appendix B](#).

After reading through these mandates and statements it is clear to me that one Provincial ministry is not talking with the other when strategies and mandates are being implemented. It also appears that the agreements and acts in place are not being adhered to. This led me to assess the following.

I first looked at the Ministry of Tourism Culture and Sport. This Ministry states *“Resource-based tourism is tourism based on using and enjoying the natural environment and resources on Crown lands and waters. Resource-based tourists hunt, fish, visit provincial parks and conservation reserves, camp, canoe, hike, snowmobile, view wildlife and plants, and enjoy other similar outdoor activities.”*



This covers all of our attributes in North Frontenac. We have all the resources to implement resource based tourism and this will be taken away from us if the IWT projects proceed.

There are guidelines for Renewable energy on Crown land. *Renewable energy developments on Crown land need to be consistent with provincial energy plans, programs and goals. You may also be granted access to Crown land for a renewable*

energy project if it supports:

- *Provincial economic development priorities*
- *Off-grid Aboriginal community use*
- *Small-scale use for local resource management*

In early 2014, the Ministry of Natural Resources and Forestry (MNRF) approved new policy that covers renewable energy projects on Crown Land. It provides direction on where and how the ministry grants access for these projects.

The policy states *“This policy framework establishes a number of requirements that must be met to gain access to Crown land to advance a renewable energy development proposal including:*

- *alignment with government energy plans, programs and goals, including ability to connect to available or planned transmission or distribution,*
- *consistency with legislation, Crown land use plans and policies, and*
- *alignment with the Aboriginal, provincial and/or community economic development objectives contained herein.”*

Obviously the alignment of our community economic development objectives does not meet the requirement to establish IWT's in our municipality. I checked further on bullet two from above and checked the land use policy for Crown Lands and have the following to report.

Pg 29 Section 4.7 states;

CONSULTING WITH MUNICIPALITIES AND PLANNING BOARDS STANDARD:

Where a proposed change in area-specific land use policy for Crown lands is being considered through a Crown land use planning process, and the area is in the vicinity of, abutting with, or within a municipality or planning board area, the comments of the municipality or planning board must be requested. The requirement to seek comments also applies to proposals that may be further from a municipality or planning board area, but which may have a significant impact on the community.

As there is a shift for crown land use going from tourism and forestry to industrial wind farms our municipality should have been contacted and discussion should have taken place before any thought of changing crown land use was approved and announced. These projects appear to be in direct violation by the government of Ontario in relation to consistency with legislation, Crown land use plans and policies.

6. Root Cause

There are many reasons why this is happening but the key root cause in my mind is;

There is a lack of adequate and effective implementation, communication and transparency with provincial mandates and legislation.

1. There is the lack of teamwork and/or coordination between ministries and their implementation of their mandates.
2. There is a lack of open and transparent communication, consultation with the municipality.
3. Green Energy Act is flawed and/or not being implemented as intended.

7. Conclusion

After conducting this analysis and assessing the performance and management of the Ontario Provincial Ministries involved with this issue, I feel further action is required in order to put forth our concerns and ensure that IWT's do not obtain approval for our municipality.

8. Actions

The following are the actions required to address this issue.

Communication

- Post this paper on our website;
- Send this paper to the Premier and the Minister of Energy and other applicable Provincial and Federal Ministries;
- Share this paper with IESO;
- Share this paper with neighbouring Townships and Counties;
- Share this paper with the Chief Doreen Davis;
- Share this paper with the media;
- Share this paper with our residents;
- Share this paper with special interest groups.

Vote on Proposal Support Resolution

Completed, as per resolution and that we do not support the Proponent's proposal and have declared ourselves as unwilling hosts.

Meet with Provincial Government

This position paper indicates all the Provincial mandates and requirements for each applicable Provincial department and the Premier herself. These show that these are not being followed and these need to be addressed by setting up a meeting(s) to discuss and reach an agreement.

Send letter to IESO

We need to send a letter to the IESO to explain why the Proponent should not be allowed to win the request for proposal.

Implement an IWT Bylaw

- Put in place an IWT specific bylaw.

Strengthen our Economic Development Strategy

Have our economic development strategy and plans strengthened and endorsed by our MP and MPP.

Appendix A - About North Frontenac

The Township of North Frontenac is a 1,164.73 square km lower-tier municipality, part of the County of Frontenac, and home to over 1,842 permanent residents (and 7,000+ seasonal residents). The low density of the population (1.7 people per sq km) makes for the preservation of an amazing landscape. Also, North Frontenac is beautifully set in the heart of eastern Ontario's cottage country. For these reasons it one of the best destinations for outdoor activities and relaxing living in southeastern Ontario. Our peace and tranquility is only a few hours from Toronto, Ottawa or the United States.



North Frontenac is in the heart of eastern Ontario's cottage country in the Land O Lakes region. Cottages and campsites dot the shores of the Township's many clean lakes, streams and rivers. Our expansive, natural, and undisturbed wilderness boasts infinite opportunities for outdoor recreation. Located entirely on the Canadian Shield, the landscape is quite majestic offering both raw beauty and a gentler, softer side. Both extremes offer natural beauty, wildlife, outdoor activities, and the tranquility of North Frontenac and is what most residents and visitors love about the area.

Our township offers much to do in the summer, and of course, being in the Land O' Lakes is a tremendous draw, and residents, their family and friends, and tourists spending leisure time in, and around, the water; enjoying a variety of activities; swimming, motor-boating, fishing, water-skiing, tubing, canoeing, sailing and kayaking. North Frontenac Park Lands host a collection of 184 backcountry campsites, many accessible by water only and are highly desirable, nestled along the shores of 12 lakes in the Madawaska Highlands and Mississippi Valley watershed. Our visitors and residents can experience outdoor recreation from the solitude of a canoe trip down its many lakes and rivers to the adrenalin of shooting rapids.



The winter season is also enjoyed by residents, and significant snow blankets the landscape, replacing the lush green scenery of North Frontenac with an alternatively beautiful appearance. Residents commonly enjoy snowmobiling, cross country skiing and snowshoeing on the large expanse of trails. In the winter season you can continue to fish through the ice for trout or walleye. In all, the vast expanse of natural setting that exists in North Frontenac, with a seemingly endless array of scenery to take in, is equally beautiful, and stunningly unique, during all seasons.

Our community is experiencing growth in the artistic field and other small businesses. We are seeing more home based business and artisans set up shop here. We have a very strong

community focus and have an abundance of activities for social events and community get-togethers.

North Frontenac has the darkest skies in Eastern and Southern Ontario and we are easily reached by millions of potential visitors from Southern Ontario, Eastern Quebec and Northern New York. In addition to providing education and information we have public star gazing nights with the assistance of expert astronomers and Astro-photographers. Our Dark Sky Preserve is a public space with amenities including parking, washroom, electrical service and the concrete pad, where anyone can setup their telescope and enjoy the dark skies.

Appendix B - North Frontenac's FutureNorth Frontenac Township Strategic Plan

The purpose of implementing a strategic plan for the Township is to identify our key goals to ensure a focus on short term service delivery and long term sustainability for the future. The implementation of a strategic plan is necessary to ensure alignment of Council direction with the work plans of the Township's administration staff. This ensures our focus for revenue generation and managing of the budget is primarily focussed on our strategic goals. By doing so it ensures all activities of Council and Administration has value add for our community.

Mission Statement - The Township of North Frontenac's mission is the effective, efficient and sustainable delivery of services to its citizens.

Vision Statement - The Township of North Frontenac will preserve our unique and pristine natural environment to promote a strong and resilient rural community.

To achieve our Mission and our Vision we have defined the following long term goals for North Frontenac Township. These goals have been decided on based on the review of our SWOT analysis

- Enhance Existing Long Term Capital Plan
This goal has been established to ensure long term sustainability for Township assets and infrastructure.
- Enhance Economic Development Initiatives
This goal has been established to identify and establish opportunities to improve our economy to assist with new sources of revenue, employment and business support.
- Enhance Public Education & Communication Plan
This goal has been established to ensure we communicate effectively with our residents, partners and stakeholders.

To enhance our Economic Development Initiatives we have developed an Economic Development Task Force (EDTF) who has developed a strategy for our Township as described as follows.

North Frontenac Township Economic Development Plan

To align with the township's strategic direction the Economic Development Task Force (EDTF) is focussed on Promoting Economic Development initiatives and have identified specific initiatives designed to assist with the Township's direction. We have structured these initiatives to compliment the Township strategic direction for economic development which include;

- Development Ready.
- Enhancing Tourism Opportunities (branding, signage, increasing trails, boat launches, etc.).
- Eco-Tourism.

The goal here is to have in place the processes and support infrastructure that will be required to expand and support new and existing businesses in North Frontenac. By doing so, we will have created the opportunity to increase the economic benefits and the tax base from a business perspective and to increase year round residential population which will also add to the revenue generation from a tax perspective.

This team has identified the following strengths and threats

Strengths	Threats
Dark Skies	Zoning bylaws
Clean waters	Tourism decline
Tranquility	Economic downturn
Trails	Global warming
Vistas	Government regulations
Many lakes	Government spending/budgets
Forestry/Lumber	Downloading of services from higher government
Arts & Culture	Ageing population
Heritage	
Camp sites	

To implement our strategy and economic initiatives we have embarked on two key initiatives that being to enhance our four seasons scenic route and to enhance our four season over night accommodations by assisting current lodges to upgrade, attract a hotel franchise and to revitalize motels and bed and breakfast establishments. We have the unique and pristine environment for all sorts of outdoor activities such as hunting, fishing, hiking, cross country skiing, camping and canoeing to name a few.

In addition we have been running a Crown Land Stewardship Program (CLSP) in an agreement with the Ministry of Natural Resources. The Crown Land Stewardship Program continues to enhance tourism opportunities in North Frontenac Township. The program revenue allows for maintenance of the Crown Roads (leading to the campsites), boat launches, and campsites which in turn increases the number of visitors to our municipality. This program continues to operate via the revenues it receives through the sale of road permits and the rental of campsites from our many visitors.

The CLSP continues to offer employment opportunities for adults and students and continues to be a true benefit to residents, businesses and visitors to North Frontenac Township via maintained lakes, roads and boat launches within the CLSP. In 2014 a new Facilities/Recreation Supervisor was hired, two students and a new Crown Land Stewardship Program Field Supervisor. The CLSP began to pay for a part-time Office Support position throughout the camping season. This position spent several hours per week throughout the summer months replying to enquiries from new and seasoned outdoor enthusiasts and has immensely benefited the Program and response time to enquiries. The total number of campsite bookings for 2014 were 2,655 providing us with a total net sales revenue of \$136,000.



The above backgrounder is required as information that justifies the economic development stance North Frontenac takes against IWT's for our municipality.

Appendix C - Resident Comments – A Sampling

- *My family has treasured the pristine wilderness around our family property on Brule Lake for over 100 years, and we hope that it will remain a place of tranquility for the generations to come.*
- *The danger to the incredibly diverse environment of North Frontenac is too great, for this reason I fully support your and councils action on this matter.*
- *I have seen and lived near 'wind farms' in Italy, France, Germany, Alberta and south western Ontario. These facilities had one very important common factor, they were all in open terrain, fields, pasture, etc. The NextEra representatives did not discuss the environmental effects of clearing swaths of Canadian Shield to accommodate the construction and ongoing operation of turbines in either of the two projects that will effect North Frontenac.*
- *I am a cottage owner and run a small cottage rental business in the Plevna area and would be negatively impacted by the wind turbine project. Also, given the level of importance that the tourism industry is to this area I would suggest that every effort should be made to protect and nurture this industry which, in my opinion, would be negatively impacted by the wind turbines presence. I wanted to provide a few comments on the proposed wind farm. I have been a cottage owner for over 30 years on Lake Kashwakamak, and many of my wife's family also own and some for over 50 years, in total we have seven properties on the lake. I was President of the south shore road association a couple of times probably a total of 20 years in this role or related roles. Of course we see this as a beautiful unspoiled paradise that we love and want to keep pristine. I live in New York City now so the stark difference is quite astounding as you can imagine. While I am a financial executive I am also a mechanical engineer and have followed energy issues closely and through family have been much involved in the environmental industry. I did not attend the information session but many friends and relatives were there and from all accounts I believe you are following a fair and responsible approach to this assessment. I only want to provide a few comments from the perspective of an American business man and to put some of the energy issues into perspective. The wind farm industry is growing and does have a lot of proponents in the US and as a clean energy source it is quite effective globally especially in China HOWEVER it is not the energy source to watch closely for the most current trends and an indication of the future supply of renewable energy. The one to watch is solar and particularly residential solar. The price point is getting close to making the home solar 'plant' economic and practical and recent technology developments bode well for solar at small scale, even for a region where hours of sunlight are limited. Here is a quote from a recent article, and I am sure you can find more that expand on this theme; "The U.S. installed 1,306 megawatts (MW) of solar photovoltaic's (PV) in the first quarter of 2015 to reach 21.3 gigawatts (GW) of total installed capacity, enough to power 4.3 million American homes. 51 percent of new electric generating capacity came from solar in Q1 2015, and the residential and utility-scale segments each added more capacity than the natural gas industry." I would encourage you to look closely at the nature of a wind farm installation, the capital cost, the immense*

construction needs and of course the transmission requirements and then contrast this with home based solar which will only become more cost effective and efficient in the next decade. Maybe wind farms are most appropriate for China but I would suggest that for our cottage area for our particular economic and environmental reasons that there are better solutions. If it is money for the township that is an issue I for one and I believe my entire family would take the position that increased taxes is preferable to and American utility building a wind farm in our neighbours back yard. I point out that I am an American taxpayer but I do not support an inappropriate project especially by a US based utility. Keep up the good work and continue to protect your (our) most precious asset, the unspoiled nature of your little paradise, believe me from having seen much of the rest of the world it is precious.

- *We bought the cottage in 2009 and have thoroughly enjoyed it. It takes a long time to save enough money to buy a cottage when you are raising your family. One of the reasons we chose the North Frontenac area was so much of it is unspoiled and pristine. We were disappointed when we found out that a company wanted to place wind turbines in the North Frontenac area. The turbines most certainly will not add anything to North Frontenac, except perhaps controversy. On Saturday I attended the presentation at the Harlowe Community Hall and listened to the company's presentation and the questions from the floor. After hearing everything, I do not see an upside to having the wind turbines. The financial benefit to North Frontenac was not very large and the number of permanent jobs was very small. My wife and I also have the concern that if you "open a small crack" and let the this company build these turbines, it opens the door for other projects to begin that also take away from the Land o Lakes area. We certainly hope that North Frontenac's council will vote against having these wind turbines constructed in our township. Let's keep North Frontenac unspoiled and pristine.*