

26 June 2020

Recovery Management Section
Ministry of Environment, Conservation and Parks

via email: Recovery.Planning@ontario.ca

Re: CanWEA comments in response to DRAFT Government Response Statement to the Recovery Strategy for the Little Brown Myotis, Northern Myotis and Tri-colored Bat in Ontario

The Canadian Wind Energy Association (CanWEA), is the voice of Canada's wind energy industry, actively promoting the responsible and sustainable growth of wind energy. Our members are Canada's wind energy leaders. They are wind energy owners, operators, manufacturers, project developers, consultants, and service providers, and other organizations and individuals that support Canada's wind energy industry. CanWEA appreciates the opportunity to provide comments to Ontario's DRAFT Government Response Statement to the Recovery Strategy for the Little Brown Myotis (*Myotis lucifugus*), Northern Myotis (*Myotis septentrionalis*) and Tri-colored Bat (*Perimyotis subflavus*) in Ontario, issued on 29 May 2020.

As noted in CanWEA's 20 August 2019 response comments to ERO 019-0189, CanWEA generally agrees with the adoption of the federal Recovery Strategy for the Little Brown Myotis, Northern Myotis, and Tri-colored Bat issued by the Government of Ontario on 5 December 2019, and appreciates that the 2019 comments were considered in the drafting of the Government Response Statement (GRS). General issues for which further consideration was presented by CanWEA in August 2019 and how these considerations were addressed in the GRS are summarized below.

Focus on Wind Energy Fatalities and Potential impacts from the Wind Energy Industry vs. Other Sectors

In the GRS, CanWEA has noted, and appreciates, that most discussions of impacts and recovery actions are not industry-specific. Proposed government-led or government-supported recovery actions include a single item that is specific to wind energy - assessing the population-level effects of wind energy mortality – whereas small number of other proposed actions loosely include 'industry', as a whole. CanWEA also appreciates the GRS clarification of species fatality rates from wind energy, which aligns better with current understanding (i.e., low rates for northern

myotis and tri-colored bat, and higher rates at some locations for little brown myotis). Still, CanWEA believes it to be crucial in future evaluations of the relative impacts to bats from various industry sectors and public messaging of those potential impacts consider and emphasize discrepancies in monitoring effort, relative to other industries where similar quantification of impacts is not nearly as robust, if required at all. For instance, language such as *Wind turbines represent one of the largest sources of anthropogenic.....mortality documented for bats* (GRS; Lines 179-181) must be qualified with information pertaining to the level of monitoring that occurs for the wind industry vs. other industries and how this will bias understanding of relative impacts. CanWEA also notes that the GRS includes some misleading language in regards to fatality monitoring methods at wind energy facilities, for example, *Estimating resulting mortality can be difficult because carcasses are hard to locate due to vegetation, decomposition, scavengers, and size of area that would need to be surveyed* (GRS; Lines 183-185). The GRS does not appear to acknowledge that each of these factors is addressed in complex estimator models used to determine corrected fatality rates, and the GRS incorrectly infers that these factors may be contributing to underestimates of bat fatality.

It is CanWEA's understanding that the GRS will inform the actions the government will take to aid recovery of the three bat species, and CanWEA looks forward to working with the Government of Ontario to enact Government-led and Government-supported actions put forth in the GRS, specifically:

Government-led Actions

The GRS includes a commitment to *Continue to support.....industry partners.....to undertake activities to protect and recover [the species]. Support will be provided where appropriate through funding, agreements, permits....* (Lines 281-284) and to *commit to lowering greenhouse gas emissions to 30 percent below 2005 levels by 2030* (GRS; Lines 299-300). Given that various sites have completed their monitoring programs, it is important to make sure that there will not be any additional retroactive testing that would be applied to them. CanWEA is supportive of these proposed actions and looks forward to working collaboratively with the Government of Ontario to achieve these goals.

Government-supported Actions

CanWEA looks forward to providing industry representation in support of action 6. *(High) Working collectively with industry ... develop, implement evaluation and promote best management practices to minimize the impacts of industry activities and operations on [the species]* (GRS; Lines 374-378). CanWEA is continually working with government representatives, wind developers and operators, researchers, consultants and other supporting

organizations to improve the existing knowledge and ensure that best available and reasonable practices are implemented in support of conservation of these bat species.

CanWEA also notes a proposed action 11. (*High*) ... *monitoring population-level effects of mortality at wind turbines* (Line 428) and ... *monitoring species' population trends, distribution, threats...* (GRS; Lines 431-432). It is recommended that this be revised to clarify that the objective is to monitor **potential** population-level effects, as there is limited information available regarding existing or pre existing population levels that suggests such an effect. However, CanWEA, through its role alongside Ontario government representatives as a Steering Committee member of the Wind Energy Bird and Bat Wind Monitoring Database, has supported similar research objectives and continues to work collaboratively to advance the existing understanding of population levels of these bat species.

As noted in CanWEA's August 2019 response, we believe that the wind industry can be a strong partner in the development of needed renewable energy and that it is critical that the wind energy industry have an opportunity to engage with the Government of Ontario to progress conservation efforts while preserving and advancing the contributions of renewable energy in the province. We look forward to future collaboration on this issue.

Sincerely,



Brandy Giannetta
Regional Director Ontario
Canadian Wind Energy Association