

January 13, 2012

Sue Edwards
Senior Project Evaluator
Renewable Energy Team
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5

Dear Ms. Edwards:

**RE: Injasuti Developments, Beaver Creek Solar Farm (Municipality of Central Elgin)
Response to Technical Review
(MHBC FILE 08220B)**

Further to your email on January 11, 2012, this letter presents our responses to the technical review of the Beaver Creek Solar Farm application. We have organized the questions as listed in your email.

Project Description Report

1. *Could you provide the nameplate capacity of the project in both AC and DC (I assume the 500 KW is AC).*

The Beaver Creek and Flowerburn Solar Farms are the same electrical design each with a nameplate capacity of 495 kW AC or 638 kW DC.

Consultation Report

1. *Did the Kettle Creek Conservation Authority review the documents? Did they have any comments?*

The Kettle Creek Conservation Authority was included in the circulation list for Public Open Houses #1 and #2. These notices provided information on the location of the Open Houses as well as an overview of the proposed solar farm and technical reports.

The lands subject to the application are not located within the regulated area of the Kettle Creek Conservation Authority (refer to enclosed map).

2. *Has there been any additional contact/ information provided to the proponent from Aboriginal communities, agencies or municipalities since the submission of the REA application?*

We have not received any additional contact or information from the consulted Aboriginal communities, agencies or municipalities since the submission of the REA application other than the Municipality of Central Elgin confirming in September 2011 that they do not have an Archaeological Master Plan.

3. *The Municipality identified several concerns (listed below) in their MCF returned to the proponent in May of 2011, how has (or will) the proponent addressed these concerns?*
 - a. *Construction impacts to Beaver Creek – Municipality suggested acceptable construction practices regarding erosion mitigation should be utilized.*

The subject property (43921 Fruit Ridge Line) is approximately 65 hectares (160 acres) while the area proposed for the solar farm is approximately 6.5 hectares (16 acres). Beaver Creek traverses the southern portion of the property and is over 600 metres south of the proposed solar farm.

Once the solar panels are installed, any disturbed areas will be reseeded with native, non-invasive species to prevent soil erosion.

The Beaver Creek Solar Farm will use trackers (as opposed to fixed mount). The surface area of the trackers is only 50 square meters and each tracker is placed on an approximate 25 meter grid in a well vegetated field so there will not be significant drainage issues. The grading as a result of construction will not result in significant water runoff.

- b. *The existing entrance should be used for site access.*

The existing entrance on Centennial Road will be utilized for site access.

- c. *Permits (if necessary) should be obtained for oversized loads, work on municipal road allowances, and buildings and structures.*

Injasuti Developments understands that any work on a municipal road allowance will require a road occupancy permit. However, it is not anticipated that any additional permits will be required based on the scope of the development.

- d. *Roads – half load restrictions apply during certain months.*

Injasuti Developments is aware that half load restrictions apply to Fruit Ridge Line and Centennial Road from March 1 to April 30. It should be noted that the Construction Plan Report addressed traffic impacts and provided the following conclusion:

"No road impact is expected beyond what might normally occur from permitted agricultural or industrial operations in the vicinity of the project. The size of equipment used to deliver the

materials, grade and construct the solar farm will not exceed the normal truck or trailer sizes permitted on the public roads. No long or oversize truck permits will be needed for construction" (p. 8, IBI).

Construction Plan

1. *Are neighbouring properties serviced by water wells?*

Neighbouring properties are serviced by water wells. The Beaver Creek Solar Farm will not impact these wells.

Design and Operations Report

1. *Section 4 mentions the use of a silt fence. However, this mitigation strategy is not mentioned in section 5.2.3 when discussing surface water.*

The recommendation for using a silt fence was based on the findings in the Environmental Impact Study (Section 6.1 – Mitigation Measures). The silt fence will be installed 10 metres east of the west project location boundary as shown on the Site Plan in the Design and Operations Report.

If you have any questions or require further clarification, please let us know.

Yours truly,

MHBC PLANNING



Dave Aston, M. Sc, MCIP, RPP

- c. Paul Marot, Injasuti Developments

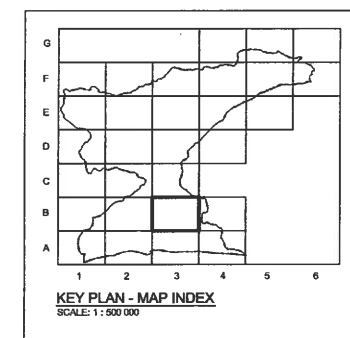


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LEGEND

WATERSHED BOUNDARY	
REGULATION LIMIT	
WATER COURSE & WATER BODY OUTLINE	



The regulation limits have been determined in general conformance with "Guidelines for Developing Schedules of Regulated Areas" Conservation Ontario, August 2003. The regulation limits are based on existing flood plain mapping and shoreline hazard mapping previously prepared for the KCCA, new floodplain estimation and topography provided by the Ministry of Natural Resources.
 Wetland limits provided by the Ministry of Natural Resources, Aerial Photography April, 2000.
 Reference grid refers to North American Datum (1983).
 Map Projection - Universal Transverse Mercator Zone 17

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No.	REVISION	DATE	ISSUE AND APPROVAL DATES
			ISSUED FOR KCCA APPROVAL 2005-11-16
			KCCA BOARD APPROVAL 2006-12-13
			SCALE: 1: 10 000

ONTARIO REGULATION 97/04
 REGULATION FOR DEVELOPMENT, INTERFERENCE WITH WETLANDS,
 AND ALTERATIONS TO SHORELINES AND WATERCOURSES.
 KETTLE CREEK CONSERVATION AUTHORITY REGULATION 181/06

MAP No. 7 OF 29
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