



Barry Duffey
Environmental Programs Division
Ministry of the Environment
135 St. Clair Avenue West, Floor 4
Toronto ON M4V 1P5

September 1, 2010

Re: Response to Discussion Paper on Offshore Wind Facilities Renewable Energy Approval Requirements. EBR Registration # 011-0089.

Toronto Environmental Alliance (TEA) is a member-based environmental organization that advocates for a green, healthy and equitable Toronto. Toronto Environmental Alliance has long been a proponent of renewable, environmentally safe energy sources, especially for Toronto, where smog days and air pollution have been a long term concern. We support the Green Energy and Green Economy Act as keys to creating a green, equitable future, with clean air, a healthy environment, reliable energy sources, and good green jobs for all. Off-shore wind power presents a key opportunity for locally-produced and clean power for Toronto residents.

The proposed approval regulations for off-shore wind facilities do not adequately address human and environmental impacts of off-shore wind facilities, and effectively eliminates off-shore wind locations near Toronto, putting the growth of the wind industry, and a clean energy future at risk.

The proposed 5km Exclusion Zone is an arbitrary tool that wrongly restricts wind facilities from the shores of Toronto (and many parts of Ontario) due to increased depth at 5km off shore rendering off-shore wind turbines economically unfeasible. This excludes wind turbines from regions in close proximity to large urban centres with limited ecological value, where the power can be generated close to consumers, eliminating the need for destructive electrical transmission corridors. A blanket approach simply limits the economic viability of green energy in the places where it is most useful, and does not ensure the protection of the most vulnerable and important ecological systems.

The Exclusion Zone may have the unintended consequence of increasing pressure on shallower waters and increasing the speculation and density of wind facilities farther from Toronto. Pressure to build onland (where a turbine could be as close as 120 metres from a wetland) will also increase.

TEA advocates for a scientific approach that would require the proponents of a wind facility to demonstrate minimal negative impacts no matter where they are located through site specific studies of near shore activities, ecological and heritage features, health and economic impacts, noise modelling and pre- and post-construction impact modelling.

TEA concurs with the recommendations put forth by the Green Energy Act Alliance, and the proposed siting regulations suggested by Ontario Nature (exclusion zones around Important Bird Areas and known flyways and corridors). All of these groups agree that more comprehensive requirements are needed to protect the environment and wildlife, and that exemptions and exceptions to the exclusion zone are needed.

Conclusion and Recommendations

In summary, the proposed Offshore Exclusion Zone will not address all of the economic, safety and ecological concerns posed by offshore wind turbines in some areas and will exclude the development wind power facilities in near-shore areas that are appropriate for such development.

We urge the Ministry to create better regulations and parameters for wind turbine siting, including a process for exemptions to any Exclusion Zone in cases where there would be no significant impact.

RECOMMENDATION #1 Develop an exemption provision for the Offshore Exclusion Zone permitting the development of wind power projects within the 5km zone in cases where the project proponents can demonstrate that the project will have no significant impacts or those impacts can be effectively addressed by mitigation.

RECOMMENDATION #2 Develop criteria upon which to assess the impact of offshore wind power projects, including outlining acceptable assessment and mitigation methodologies.

RECOMMENDATION #3 Develop criteria for comprehensive pre- and post- construction monitoring of offshore wind power projects, with data being publicly available.

Please contact Emily J. Alfred, Campaigner at 416 596 0660 or emily@torontoenvironment.org if you have any questions about these comments or for further feedback on off shore wind regulations.

Sincerely,

Emily J. Alfred
Campaigner
Toronto Environmental Alliance

cc.
Premier Dalton McGuinty,
Minister of the Environment John Wilkinson,
Minister of Natural Resources Linda Jeffrey,
Environmental Commissioner Gord Miller.