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Program Officer, Ministry of Natural Resources  
Policy Division, Renewable Energy Program  
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October 4, 2010

Re: Offshore Windpower: Consideration of Additional Areas to be Removed from Future Development. EBR Registration # 011-0907.

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.

As stated in our submission to the Ministry of the Environment regarding *Discussion Paper on Offshore Wind Facilities Renewable Energy Approval Requirements, EBR #011-0089*, dated September 1<sup>st</sup>, 2010, TEA objects to a blanket 5km exclusion zone, as it precludes some key areas near major urban centres, including Toronto.

We urge the Ministry of Natural Resources to create regulations that use siting studies and assessments of local ecological and cultural issues as opposed to blanket regulations that would harm the emerging green energy industry in Ontario. 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 proposed 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 any proposed exclusion zone are needed.

### ***Conclusion and Recommendations***

In summary, an 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 of Natural Resources 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 any 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](mailto: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