

August 17, 2010

Barry Duffy
Manager
Ministry of the Environment
Environmental Programs Division
Program Planning and Implementation Branch
135 St. Clair Avenue West
Floor 4
Toronto, ON
M4V 1P5

Dear Mr. Duffy

Re: Renewable Energy Approval Requirements for Off-shore Wind Facilities

In the past, the Township of Huron-Kinloss has recognized and supported the need for renewable energy in the Province of Ontario. We currently have one on-shore wind facility operational with several more proposed for the future. We are also pleased to have several Micro-Fit solar project being installed

We were very concerned when the Province introduced O. Reg. 359/09 in September of 2009, which removed the requirement for municipal planning approvals under the Planning act for renewable energy projects. We learned through previous experience that the public interests need to be recognized and their concerns were best addressed at the local level of government. With more renewable energy projects on the horizon, our residents are still looking to us to provide direction to these proposals and protect their interests.

The Township of Huron-Kinloss does not support the development of Off-shore Wind Facilities in areas adjacent to the Municipality or in any part of the Great Lakes Water System where they will negatively affect the Natural and Cultural Heritage. We, as well as many coastal areas in Ontario have become tourism destinations based largely on the high valued landscapes that the Great Lakes provide. The coastal area is highly developed and constantly growing to accommodate those wanting to be close to Great Lake's natural brilliance. The municipality, through levies and tourism expenditure, relies heavily on these shoreline areas to maintain the local economy and infrastructure. The development of Off-shore Wind facilities will only have a negative affect on areas in which they are adjacent. Regions with these facilities will most certainly lose their identity as a natural retreat and the associated economic benefits.

We have long been known for our natural and cultural landscapes and have made it a symbol of the municipality. We have had to incorporate provincially mandated policies into our planning documents to protect the natural heritage of the shoreline. If offshore wind development is allowed, the development and construction of these turbines can cause a disruption to the dynamic beach that would not normally be permitted.

Potential onshore visibility impacts depend on a number of factors; the greatest of which is the distance between the observer and the wind turbine. For a normal 1.8-meter tall person standing on a shoreline, the horizon is approximately 5 km away, but for a 120-

meter tall wind turbine to be hidden from the shoreline, it would have to be 47 km away. Navigational light at the top of the nacelle of a turbine would still be visible 40 km from shoreline.

We agree with the position of the Lake Huron Centre for Coastal Conservation in that there is a lack of detailed information on the environmental impacts that the construction and operation of turbines will have.

Therefore the Township of Huron-Kinloss takes the position that:

- No offshore wind turbines are placed within 24 km of the shoreline so that the natural and cultural heritage of the Great Lakes Shoreline landscape is preserved for residents and visitors to revere.
- Independent research is undertaken to examine potential impacts to water quality, aquatic community as well as offshore, near shore and onshore ecosystems.

Regardless of whether offshore wind turbines are considered by some to be visual pleasing, they should not be placed in a setting that throughout time has remained perpetual and pristine.

Thank you for the opportunity to comment on the proposed Off-shore Wind Facility Renewable Energy Approval Requirements. The Township of Huron-Kinloss feels very strongly about their position on this issue and we hope that these recommendations are received with the highest regard.

Sincerely

Mitch Twolan, Mayor
Township of Huron Kinloss

CC: Carol Mitchell, Member of Provincial Parliament for Huron-Bruce, via email
Ben Lobb, Member of Parliament for Huron-Bruce, via email
The Honourable Gail Shea, House of Commons, Ministry of Fisheries and Oceans, via email