

2010-02-24

Dear Ms. Patricia Staite,

I give you permission to use or present this information upon "reference to me as the author of such works" and especially for use during Hydro One's Draft Environmental Assessment Report for the Supply to Essex County Transmission Reinforcement Project or for 'policy-making decisions' within the Great Lake Basin and pertaining to IWT land and water developments. I am asking for my issues to be raised during the report's public review period. I will be asking the Minister of the Environment, Hon. John Gerretsen for a higher level of assessment for a class EA project --a Part II Order request.

I am not in support of infrastructural changes to power sources that will contribute or service the future developments of Industrial Wind Turbines in Essex County or anywhere within the Great Lake Basin and its watershed.

I have based the following concerns within the Clean Water Act and the Source Water Protection Primer by Rick Findlay under the Watershed Approach Plan ([www.pollutionprobe.org](http://www.pollutionprobe.org) Tel: 613-237-8666) and what I have learned through the research of the International Joint Commission in their Biennial Meeting Nearshore Paper, Oct. 2009, and through the 5 months of intensive research.

I have sent previous concerns to you and this is the same only edited and formatted differently. I will send any added concerns pertaining to this paper, to you at a later date.

#### **WATER QUALITY CONCERNS FOR SOURCE WATER IN THE GREAT LAKE BASIN/WATERSHED AND OFFSHORE INDUSTRIAL WIND TURBINE PROPOSALS OR DEVELOPMENTS**

##### **Health and Water Quality**

1. Industrial Wind Turbines (on or off shore) represent "point source" pollution (from an industry source) or contamination upon surface, groundwater and source water systems within the Great Lake Basin and its watershed. According to the ERCA Environmental Assessment Report by Baird & Associates of Sept. 2009, "turbine lubricant volumes are stated to be 1,033 gallons (minimum) per turbine. Impacts on water intakes and ambient Lake Erie environmental conditions could occur during any of the three project phases (construction, operations and decommissioning) and require greater detail from the proponent to mitigate hydrodynamic and sediment transport concerns. This is of particular concern with respect to potential adverse effects on water quality at Union Water Supply System intakes." (pg. 7 of 57 in Report) Also, according to the IJC's Great Lakes Water Quality Agreement of 1978, intakes are protected areas or zones in particular to "oil discharge". Also, how are IWTs in these zones going to impede future "expansion" of water intake systems as 'climate changes' take effect upon lake levels and water quantity and quality? This alone makes IWT developments non, "no regret" actions upon the Canadian landscape/waterscape.

I believe offshore IWTs during all phases of their projects will likely cause re-suspension and significant disruption of toxic sediments which may find their way into the source water supply, especially when constructed by or within "intake protection zones" (IPZs) as in the case of SouthPoint Wind Inc. in Pigeon Bay. Unlike the US, Ontario does not support the banning of environmentally sound directional drilling under the bed of the Great Lakes. Perhaps now there should be a ban in Ontario as well.



2. Windsor/Essex County and generally, southwestern Ontario, is an area of "high-industrial-activity", therefore it is an area of "high pollution" and major stresses in the production of contaminated effluent and waste dumping (CSO-combined sewage overflows) within source water or lake water. The Nearshore areas (where most of the offshore proposals are taking place) are hence, already under considerable stress. In fact, some areas (Wheatley Harbour, St. Clair River and Detroit River) are "Areas of Concern" due to high levels of pollution, harmful contaminants or persistent toxic substances.

3. According to Pollution Probe Ontario, "many parts of Canada continue to discharge completely untreated or poorly treated, sewage directly into Canadian waters" (pg. 22 of Source Water Primer). Also, according to Environment Canada in a report entitled "Threats to Sources of Drinking Water and Aquatic Ecosystem Health in Canada": "municipal wastewater effluents comprise the largest source of effluent discharge to Canadian waters, and population growth and urbanization will continue to increase them." (pg. 22 of SW Primer) Health Canada states that 90 deaths and 90,000 illnesses are due to contaminated drinking water in Canada each year. Ontario alone had the highest number of "boiled water" alerts in all of Canada (2006-2008) having 679 advisories out of the Canadian total of 1 760 advisories excluding those in First Nations territories. In a Windsor Star article of January 21, 2010 "Dirty Water-Time for Detroit to Clean Up Its Act", "more than 80 billion gallons of raw sewage and hazardous waste is dumped into the Detroit River every year.

According to "Environmental Defence" in an article written by Aaron Freeman in July, 2007, entitled "Great Lakes Still Being Toxic Waste Dump" "more than 92 billion tons of raw sewage is dumped into the Great Lakes annually from Canada and US sources. More than 600 million kilograms of industrial pollution including methyl mercury, PCBs, dioxins, furans and a host of other chemicals are released each year into the air, water and land in the Great Lake basin." With all this said, our part of Ontario is under "extremely" high stresses from a myriad of sources. IWTs will only compound this stress to near "breaking-point" proportions. If ever there was a "high sensitivity area" where all IWT developments were banned it should be this area. Perhaps a "polluter pays" principle should also be considered in the future to help "curb" these significant acts of pollution by industry within all aspects of the "watershed protection plan"--including similar acts by IWTs.

4. Industrial Wind Factories within source lake water are serious "potential threats" to the degree of risk in impairing water sources and should be ranked "high" on a Vulnerability Scale, a scale system already in use by Source Water Protection Agencies under "The Source Water Protection Primer" by Rick Findlay and the Pollution Probe Organization of Ontario. Use of this kind and other "best management strategies" would greatly assist in ensuring for Canadians in general a better quality of source drinking water supply. Recommendations under the Ontario government's "White Paper on Watershed-based Source Protection Planning" should be widely used and strictly followed in the future to protect "potential threats" from becoming "significant threats or actions" upon source water supply.

5. Adverse effects on embryo development (due to electro-magnetic changes, air pressure changes and general 'soundscape' or infrasound level changes) for both animals and humans is unknown and due diligence is necessary for study in this important health-related area. Often IWT company sound studies only include sound levels that are strictly relative to that from the IWT alone and don't include additional "background" noises that may also be present in the existing landscape around them so a "total" soundscape is left unmeasured.



6. Infra-sound or "tremor" effects to local species and humans where the noise generated by the IWTs is heard and "felt" throughout the body (as in "thunder") this "felt sound" has been proven by the work of Dr. Nina Pierpont to cause "tinnitus", (ringing in the ear) sleeplessness, headaches/migraines, and skin rashes within patients living in close proximity to IWT developments (see You Tube video for Suncor Wind Farm in Ripley Ontario). According to the Archives and Collections Society website reports radio transmission interference has been documented from IWT experiences in Europe. Again, this could prove hazardous to air traffic over IWT factories both on land and in the water.

7. A lack of "vital" watershed information from a Geographic Information System GIS is of great concern. This kind of technology would prove to be important "baseline" data for identifying present and future "threats" or "stresses" (that IWTs pose) within watershed source planning and protection. With this information a "multi-barrier" approach to protect source water quality from further contamination to drinking water could be adopted where a "source to tap" water quality assurance could be met.

### **Wildlife Impacts**

8. Two major "bird migratory pathways" exist within southwestern Ontario where over 100 million plus birds fly during spring and fall migration seasons each year. Some of these birds and insects are listed under the SARS Act and its protection. According to MP Jeff Watson "there is a critical problem of "habitat fragmentation" which has left Essex County with the highest number of "species-at-risk" in all of Canada". Jeff Watson also says that he is promoting the possibility of a feasibility study to render the area of the waters of the Western Basin of Lake Erie-"a National Marine Conservation Area." Wouldn't the construction of offshore wind factories counter this effort? Shouldn't all of the Great Lake Basin and its watershed be considered a National Marine Conservation Area instead of just parts of it? After all the "whole" is greater than its parts, is it not? In SE Michigan, the Detroit River has been claimed as an International Wildlife Refuge. Shouldn't Canada do the same?

9. This area also has a high "population density" and in the case of Essex County, it has the second highest population in Ontario with 166, 000 people living within 1 722 km<sup>2</sup>. Due to this, there is a lack of forest cover which affects the overall pathways (run-off) of surface and groundwater systems on land and eventually to the nearshore area of the Great Lake Basin. Urban development particularly in Essex County has caused a serious encroachment of "wetlands" already under extreme stress and recent desperate efforts are being set into action to help preserve these areas, especially around Point Pelee National Park in Leamington, ON. These wetlands are "vital sources of water renewal, cleansing and the providing of essential habitat or "breeding refuge" for a variety of species". Also, Essex County has the largest proportion of Prime Agricultural Land and potential Specialty Crop areas (definitions found under the PPS) which have not been mapped out or designated and which need preservation like the "greenbelt" around Toronto. IWTs take an average of 5.8 acres of land out of production.

10. Essex County has several "highly sensitive" wildlife reserves or protected ecological areas within its borders: Point Pelee National Park, Jack Miner's Bird Sanctuary, Holiday Beach Conservation Area, Hillman Marsh, Pidgeon Beach Marsh, Clear Creek Watershed, River Canard Watershed, Belle River Watershed and the near shores of Lakes St. Clair not to mention dozens of other conservation areas and marshlands. Flight or



migration pathways between these "refuge areas" are not well known and demand further study so as to prevent significant interruption (that IWT sites may cause) and hence possible adverse effects on habitat especially for species protected under the SARS Act or under the federal Habitat and Stewardship Program For Species at Risk. The goal of this Stewardship Program is "to contribute to the recovery of endangered, threatened and other species at risk and to prevent other species from becoming a conservation concern by engaging Canadians from all walks of life in conservation actions to benefit wildlife." Hence, IWTs on land, within the Great Lake Basin and its watershed will be in direct opposition to these efforts of conservation. Furthermore, the current Provincial Policy Statement says that citizens should be making efforts to 'create corridors' so that all wildlife protected areas should be interconnected.

### **Socio-Economic Issues**

11. Offshore IWT's represent the "industrialization" of our source water supply --the Great Lake Basin and its watershed --where companies or proponents will be making 3x the amount presently paid to conventional energy producers through the new FIT-(Feed-In-Tariff) Program outlined by the Ontario Power Authority and under the auspices of the New Green Energy Act.

12. There are nearly 40 "Areas of Concern" identified by the IJC within the Great Lake Basin where millions of dollars have been spent on both sides of the border to help "clean-up". IWT proposals are directly counter to these "Remedial Action Plans and Lakewide Management Plans" pursuant to Annex 2 of the GLWQA. In Essex County alone, there are 3 "Areas of Concern".

13. A subsequent decline in property value and property assessment has already been seen as in the case of Paul Thompson of Amaranth Township, where the Assessment Review Board (ARB) based a 50% reduction on his property assessment because of excessive noise. His home was located near a transmission station which was emitting high noise levels. Infrasound levels may not have been included in this case. Mr. Thompson is no longer living in his home. MOE does not require that low frequency noise or infrasounds meet a certain compliance level. They only regulate for audible noise (existing dBA scales are based on industry led guidelines)

14. Higher costs for water treatment will occur when source water becomes more highly polluted. On page 4 of the SW Primer: "According to the US Environmental Protection Agency (US EPA), remediating groundwater can be 40 times more expensive than taking steps to protect the water at the source. Will this be true of the Great Lakes when IWT factories become prevalent? This problem may manifest in higher costs of medical care with a greater chance of water contamination from possible "oil spills" from IWTs on land and on water.

15. There will be a "significant" debt load weighed upon affected Canadians if IWTs become mainstay "power" generating sources as is currently being proposed especially within the latest agreement of the Ontario Government and Samsung "deal". The FIT Program will strap citizens for 20 years or more into subsidy contracts with IWT factories which poses as a heavy socio-economic nightmare. Assuming turbines in the Great Lakes (or on land) produce electricity 40% of the time (must have 30 mph winds to function), the electricity from a 1000 Mega-watt offshore wind factory would cost 665 million a year or 13.3 billion



over the course of a 20-year contract with the government (TO Star). Gwyn Morgan, retired CEO for EnCana Corp. stated in a news article for the TO Globe and Mail that "development of a multi-million dollar industry based entirely on public subsidies is both a hazardous road for investors and an unaffordable road for consumers." Also a recent article by Andrew Walden entitled "Wind Energy's Ghosts" warns about the faulty "wind experience" in Europe when he starts out his article by saying "Bankrupt Europe has a lesson for Congress about wind power." Reviewing the CN White Paper on "The Logistics of Transporting Wind Turbines" will soon reveal high transport costs IWTs demand (\$100 000-\$150 000 per wind turbine) and the huge 'carbon footprint' they create at all levels of their production, construction, operation and final decommissioning.

16. IWT developments within the Great Lake Basin and its watershed will not only cause changes in the chemical, physical and biological integrity of the source water it provides (discussed above) but will also cause the impairment of beneficial uses such as fishing, boating and swimming. Possible changes in "electro magnetic" fields or "stray electricity" caused during IWT operation will render these sites "off limits" to both recreational and commercial activities within the Great Lake Basin. Subsequent loss of trade, tourism and commerce due to such impairments will prove to have significant negative effects on local and provincial commerce. According to Environment Canada, May 2000 (Great Lakes Research Conference in Cornwall) "The Great Lakes are home to 45% of Canada's industries and provides the foundation for 180 billion dollars in annual US/Canada trade".

### **Landscape/Heritage Losses**

17. The "elimination" of rock bed or lakebed within the immediate vicinity of each offshore IWT will pose as permanent and irreversible impacts within the Great Lake basin. If "mono-pile" structural designs are used for offshore IWTs then "encasement" of sediment and bedrock would be rendered unavoidable. According to the US Army Corp of Engineers, this "preferred" design has a diameter of 14-16 feet which could be driven 50-90 feet into the lakebed depending on local sediment loads. As the water depths and loads increase, the pile diameter and trenching must increase as well." With thousands of IWTs being proposed for the Great Lake Basin in factories as large as 4 400MW worth as in Canadian Hydro Developers Inc., this will prove significant impact on our source water quality. The Helimax Study proved a wind generating potential or "installable capacity" of wind energy in the Great Lake Basin equalling over 46 000MW in 65 sites. This study was commissioned by the Ontario Power Authority and completed in 2008. It should be noted that it takes 20 (5MW) turbines to produce 100MW capacity.

18. Micro-climate changes to surrounding areas where IWTs exist (land or water) will create lower temperatures, pressure changes, fog and potential adverse effects on the general health of the "water cycle" within the basin and its watershed. In an article by Andrew Levy for "Mail Online" Feb. 20 2010, Mike Page a Cessna 150 pilot photographed the 'fog' and clouds created by offshore IWT sites in Europe. This could prove to be hazardous to both airplane and shipping routes within the Great Lake Basin.

19. Ice effects, impacts or damages to offshore IWT structures is generally unknown since most studies on these kinds of IWTs are taken from those located in "ocean" water and not in "freshwater". Recently, Consumers Energy in Michigan (an offshore wind turbine proponent) stated "that it does not plan to build wind power plants in the "lower Great Lakes due to ice that can freeze more than four feet thick" and wind that "can move ice



floes with deadly force.'" (The Muskegon Chronicle-Feb. 14, 2010-www.mlive.com)  
The Environmental Report by Baird & Associates claims: "should the proponent (SouthPoint Wind Inc.) utilize ice mitigation technologies to assist in reducing 'ice 'impacts' on the turbine structures this may lead to 'premature ice sheet fragmentation' and rupturing in Pigeon Bay. Possible impacts may include ice shifting on the shore of the western basin. Ice formation in the winter month in Pigeon Bay helps shield the shoreline from erosion during extreme winter storm events (Pg. 7 of 57).

20. Changes to the bedrock and subsequent changes to the "wave climate" within offshore sites may cause shoreline erosion and thinning of nearby beaches and advancement of sand displacement or transport. A disruption of natural littoral coastal transport, processes and water pathways may occur and will need extensive Canadian-based study.

21. There will be a loss or disruption of the geologic glacial history of the Great Lake Basin, a field not yet fully understood or developed.

22. A loss of aesthetic quality or aesthetic value is also a loss of Canadian Heritage.

23. The "nearshore" according to the IJC study represents depths less than 15m and that it is a 'critical area' in the health and well-being of the lake system, for what affects the nearshore will eventually affect the farshore areas. Lake Erie's nearshore includes 60-90% of Lake Erie including most of the Western Basin. "The Great Lake Basin is where physical processes are much more similar to marine coastal systems rather than the shallow inland lake systems." Thus, "the Great Lakes are sizeable bodies of water with the potential to rival many marine systems with respect to wave energy and ability to erode and transport geologic materials along the coast."(Pg. 108 of IJC Nearshore Paper 2009) Unfortunately, the overall data gathered by the IJC indicate "an apparent deterioration of the physical, chemical and biological regimes, notable the Western Basin." "Toxins in Lake Erie and associated channels and embayments are among the most severely harmful algae bloom-impacted areas of the Great Lakes." (Pg. 82 of Nearshore Paper 2009)

24. There are lists of Acts already in place that must be used and upheld when offshore or onshore IWT developments are considered in the future when it comes to protecting the environment within the Great Lake Basin and Canadian borders.  
There are sound environmental protective policies within these Acts that should not be rendered ineffective when considering future IWT developments across Canada's landscape.

**The new Green Energy Act and subsequent "green action plans" by any government level should not take 'authoritative rule' over any such policy held thus far in place by these Acts.** These Acts and their "protective nurturing nature" must and should be upheld. If and when any of these Acts are in anyway compromised, future IWT projects on or offshore shall be rendered impossible and irrevocably unattainable. As well, studies within IWT Environmental Assessments and government environmental assessments should be strictly and solely based upon current, Canadian, scientific knowledge and intensive study.

The Acts are:

Clean Water Act  
Ontario Water Resources Act  
Ontario Safe Drinking Water Act

Source Water Act  
Canadian Environmental Assessment Act  
Canadian Environmental Protection Act  
Ontario Water Resource Act  
Conservation Authority Act  
Public Lands Act  
Fisheries Act  
Endangered Species Act/SARS Act  
Migratory Birds Convention Act  
Navigable Waters Protection Act  
Renewable Energy Act  
Highway Traffic Act

In the words of Bill Gates quoted by a site called "Intellectual Ventures Lab.com" in an article entitled "Gates on Nuclear Energy": "It is our responsibility to pursue technologies that achieve cheap energy with zero carbon emissions."

IWT developments in Canada or in this province whether on or offshore do not prove this point. Terra Power's "travelling wave reactor concept" in nuclear power technology might or finding other innovative technology that will transform my home into a "giver of energy" rather than a user of it. My home is already connected to the grid, let's use new forms of material and building design to achieve and create cheap energy with zero carbon emissions and have consumers benefit in sound monetary terms.

According to Rick Findlay, author of the Source Water Protection Primer, **"If water quality or quantity is in any way degraded, this can have a serious adverse impact on an ecosystem. Similarly, when ecosystems become degraded, this has a negative impact on water."**

As it now stands, there are enough impacts already causing significant stress on our source water supply, that being the Great Lake Basin and its watershed which supplies over 40 million citizens of both Canada and the US with drinking water. We don't need expensive, outdated IWT developments to add to this.

As citizens of this fragile landscape on this fragile planet we all call home, it is not only our duty but our *right* to protect our natural heritage.

Extending over 94 000 square miles and twice that in watershed and supplying a volume of water 6 quadrillion gallons, worth 1/5 of the world's fresh water supply, we must take heed to the warning rendered by the UN in the SW Primer: "If current trends of wasting and polluting freshwater continue, two out of every three people on Earth will suffer moderate to severe water shortages in little more than two decades from now. It is 'imperative' that we take measures to protect water sources today."

Offshore IWT factories in the waters of the Great Lake Basin and its watershed are **not** the answer to our energy shortage needs or supply for the future. I remain 'vehemently' opposed to these types of developments now and in the future. I strongly believe IWT developments in my source drinking water are against my intrinsic rights as a Canadian under the "Charter of Rights".

Sincerely,  
Jane Rogers  
(579) 733-0859



2010-02-23

Ms. Patricia Staite  
Environmental Planner  
Hydro One Networks Inc.  
Toronto, ON M5G 2P5

Dear Ms. Staite,

I have read through the issues that Mrs. Jane Rogers has brought forward to myself and your agency regarding her concerns over the developments of Industrial Wind Turbines(IWT) within the Great Lake Basin and its watershed. I am in full support of her concerns and I would like to voice that support through this letter. Mrs. Rogers' issues especially regarding health and water quality are of particular interest. Also, her issues with the IWT'S effects on wildlife in our area are of great importance as well.

I would like to ask for a higher level of Environmental Assessment for the Minor Transmission Facilities, that are being proposed for Essex County. (Stage I and 2 construction of new transmission facilities to reinforce the electricity transmission system in Essex County). I feel the issues Mrs. Rogers has presented warrants it. I am asking for a Part II Order request. I will also send my concerns along with Mrs. Jane Rogers to the Minister of the Environment.

Mrs. Rogers has educated me in regard to these issues and I fully endorse her efforts and concerns. I am therefore not in support of infrastructural changes to power sources that will contribute or service the future developments of Industrial Wind Turbines in Essex County or anywhere within the Great Lake Basin and its watershed.

I trust that you will bring these issues that Mrs. Rogers has made known to Hydro One while it develops future hydro service plans or needs to our area.

I thank-you for your time and efforts with adding my "voice" to your draft environmental study report.

Sincerely,



Ms. Rhonda St. Louis



Ministry  
of the  
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2 St. Clair Ave. West  
Toronto ON M4V 1L5

Ministère  
de  
l'Environnement

2, avenue St. Clair Ouest  
Toronto ON M4V 1L5



ENV1283MC-2010-769

March 16, 2010

COPY

Ms. Jane Rogers  
501 Wigle Grove Road  
Kingsville ON N9Y 2N8

Dear Ms. Rogers:

Thank you for your February 24, 2010 letter to the Minister of the Environment in which you request that Hydro One Networks Inc. (Hydro One) be required to prepare an individual environmental assessment (EA) for the proposed Supply to Essex County Transmission Reinforcement Project (Project). I am pleased to respond on behalf of the Minister.

It is the understanding of the Ministry of the Environment (MOE) that the Project is being planned as a Category B project under the *Class Environmental Assessment for Minor Transmission Facilities* (Class EA). Staff at the MOE will review the issues and concerns you have cited as reasons for which this Project should be elevated to an individual EA. You will be advised when a decision has been made. Your request will be forwarded to Hydro One. Hydro One will be directed to review your request and to provide any Project documentation and other information necessary to assist the MOE in its review of your request. This information will be considered by the Minister when making a decision about the request. Where required, MOE technical staff and staff at other agencies may also review the matter.

On the basis of this review and other matters required to be considered by the Minister under the EAA, the Minister will make a final decision whether or not to require that an individual EA be prepared by Hydro One. You will be notified in writing of the Minister's decision once it has been made.

I would like to note that, as with all Part II Order requests, the Environmental Assessment and Approvals Branch (EAAB) maintains a public file that is available for viewing by any member of the public upon request. Please note that personal and other information in your letter such as name, address, and telephone number and your concerns with this Project will form a part of the public record on this matter. If you wish this information to be excluded from the public file, the EAAB must be advised. Notwithstanding the above, this information may still be obtained by members of the public if the ministry is required to disclose it under the *Freedom of Information and Protection of Privacy Act*.



Ms. Jane Rogers

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Thank you for taking the time to share your concerns about this Project.

If you have any questions regarding the ministry's review of your request, please call Ms. Cindy Batista of the EAAB at 416-314-8259.

Yours very truly,



for Millicent Dixon  
Manager, Client Services Section  
Environmental Assessment and Approvals Branch

c: Ms. Patricia Statie, Environmental Planner, Hydro One Networks Inc.



Ministry  
of the  
Environment

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Toronto ON M4V 1L5



ENV1283MC-2010-709

March 19, 2010

Ms. Rhonda St. Louis  
3791 Poplar Avenue  
Windsor ON N9C 2E2

Dear Ms. St. Louis:

Thank you for your February 23, 2010 letter to the Minister of the Environment in which you request that Hydro One Networks Inc. (Hydro One) be required to prepare an individual environmental assessment (EA) for the proposed Supply to Essex County Transmission Reinforcement Project (Project). I am pleased to respond on behalf of the Minister.

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Ms. Rhonda St. Louis

Page 2

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Yours very truly,

  
for

Millicent Dixon  
Manager, Client Services Section  
Environmental Assessment and Approvals Branch

c: ✓ Ms. Patricia Statie, Environmental Planner, Hydro One Networks Inc.



**Hydro One Networks Inc.**  
483 Bay Street TCT04  
Toronto, ON M5G 1X6  
patricia.staite@hydroone.com

Tel: 416-345-6686  
Fax: 416-345-6919  
Cell: 416-819-0456



**Patricia Staite**  
Environmental Planner, Environmental Services and Approvals

March 19, 2010

Ms. Jane Rogers  
501 Wigle Grove Road  
Kingsville ON  
N9Y 2N8

**RE: Supply to Essex County Transmission Reinforcement Project**  
**Class Environmental Assessment**

Dear Ms Rogers:

We have reviewed your letter with regards to the Supply to Essex County Transmission Reinforcement Project Class Environmental Assessment and your concern about the development of Industrial Wind Turbines (IWT) in the Great Lake Basin and its watershed. The IWT is subject to independent approval processes. The purpose of our project is to ensure an adequate supply of electricity to meet the future needs in the eastern part of Essex County including the Town of Lakeshore and Municipality of Leamington. It will also improve overall security and reliability of power supply for the City of Windsor and Essex County. Like most of our transmission facilities, the new line will facilitate the connection of future renewable energy projects resulting from the Green Energy initiative, although as explained in the Draft ESR, the purpose of the project is driven by local requirements.

In your letter you have requested a Part II Order. An individual EA for the Supply to Essex Project would not consider IWT or any other generation proposal within the Great Lake Basin and watershed. Your concerns with regards to IWT projects should be addressed through the Renewable Energy Approval process.

If you would like to discuss the Supply to Essex County project please feel free to contact me at (416) 345-6686.

Sincerely,

A handwritten signature in black ink that reads "Patricia A. Staite".

Patricia Staite  
Environmental Planner,  
Environmental Services & Approvals

**Hydro One Networks Inc.**  
483 Bay Street TCT04  
Toronto, ON M5G1X6  
patricia.staite@hydroone.com

Tel: 416-345-6686  
Fax: 416-345-6919  
Cell: 416-819-0456



**Patricia Staite**  
Environmental Planner, Environmental Services and Approvals

March 19, 2010

Ms. Rhonda St. Louis  
3791 Poplar Ave.  
Windsor, Ontario  
L4K 1B9

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**Class Environmental Assessment**

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Sincerely,

A handwritten signature in blue ink, appearing to read "Patricia Staite". The signature is written in a cursive, flowing style.

Patricia Staite  
Environmental Planner,  
Environmental Services & Approvals



**Hydro One Networks Inc.**  
483 Bay Street  
South Tower, 4<sup>th</sup> Floor  
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Fax: 416-345-6919  
Cell: 416-819-0456



**Patricia Staite**  
Environmental Specialist

March 23, 2010

Ms. Cindy Batista  
Project Evaluator  
Environmental Assessment and Approvals Branch  
Ministry of the Environment  
2 St. Clair Avenue W. Flr 12A  
Toronto, ON M4V 1L5

**RE: Supply to Essex County Transmission Reinforcement Project**  
**Class Environmental Assessment**

Dear Ms. Batista:

We have also received the letters from Ms. Rogers and Ms. St. Louis containing their Part II Order Requests. The only mention of Hydro One's project is in the first paragraph of the seven page letter from Ms. Rogers, and Ms. St. Louis simply refers to Ms. Rogers' letter. Ms. Rogers states that she is not in support of infrastructural changes to power sources that will contribute or service the future development of industrial wind turbines in Essex County or anywhere within the Great Lakes Basin and its watershed.

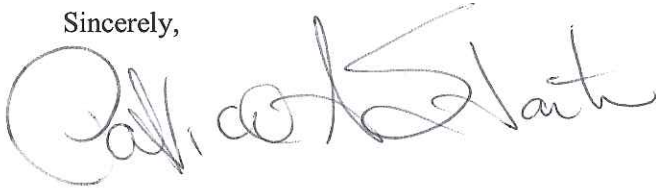
The primary purpose of the Supply to Essex County Transmission Reinforcement Project is not to accommodate wind turbine developments in the area, nor did any generation proponent request Hydro One to initiate such a project. As explained in Hydro One's Draft ESR and particularly on page 3, the primary purpose of the Project is to address supply reliability problems and provide long-term electricity capacity for the area in order to meet the present and future needs in the eastern part of Essex County, including the Town of Lakeshore and the Municipality of Leamington. The Project will also improve the overall security and reliability of the power supply for the City of Windsor and Essex County.

Like most of Hydro One's transmission facilities, the new lines will satisfy the growing electricity demand and facilitate the connection of new customers who use electricity, as well as enable the connection of generation and renewable energy sources, including wind projects. For those reasons and to supply growing electricity demand in the Leamington area, a new transformer station is also required. Again, the primary purpose of the transmission facilities is to serve the electricity needs of the area, not to accommodate wind turbines in Essex County.

Finally, generation projects, including wind turbines, are planned and built by third party companies and are not within the scope of this Class Environmental Assessment project. A separate and totally independent process exists for the assessment, approval and connection of generation projects, and proponents of generation projects must also follow applicable regulatory approvals processes. Hydro One therefore states that issues related to generation projects need to be addressed through the appropriate process.

I have completed the Table A as you requested and it is attached.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia Staite". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Patricia Staite  
Environmental Planner,  
Environmental Services & Approvals

Encl.

cc. Brian McCormick, Manager Environmental Services and Approvals



**TABLE A – PROPONENT RESPONSE TO PART II ORDER REQUESTS**

**PROponent:** Hydro One Networks Inc.

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**PROJECT TITLE:** Supply to Essex County Transmission Reinforcement Class Environmental Assessment

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**PROJECT LOCATION:** Essex County (Municipality of Leamington; Towns of Kingsville, Lakeshore and Tecumseh; City of Windsor) and the City of Windsor.

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**PREPARED BY:** Patricia Staite, Environmental Specialist, Hydro One Environmental Services & Approvals

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**PHONE # and E-MAIL:** (416) 345-6686, Patricia.Staite@HydroOne.com

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Issues and Concerns	Proponent Response	Status
<p>The requestors do not support infrastructural changes to power sources that will contribute or service the future development of industrial wind turbines in Essex County or anywhere within the Great Lake Basin and its watershed.</p>	<p>As stated in the Draft ESR (p.3) the primary purpose of the Project is to address supply reliability issues and to provide long-term electricity capacity for the area in order to meet the present and future needs in the eastern part of Essex County including the Town of Lakeshore and the Municipality of Leamington. It will also improve the overall security and reliability of the power supply for the City of Windsor and Essex County. Like most of our transmission facilities, the new lines and transformer station will facilitate the connection of new customers who use electricity, as well as enable the connection of future renewable energy sources.</p> <p>This project is independent of the wind turbine projects and is required to satisfy growing electricity demand in the area. Hydro One has not been approached by any generation proponents requesting the project. There is a separate and independent process for the assessment, approval and connection of generation projects and the proponents of the projects must follow applicable regulatory approval processes. Therefore issues related to generation projects need to be addressed through the appropriate process and are not within the scope of the Supply to Essex County Transmission Reinforcement Project.</p>	<p>Hydro One responded to Ms. Rogers verbally on February 8, 2010 stating that wind turbines were not within the scope of the project and also responded to both requestors in letters dated March 19, 2010.</p>