

# Feedback Form

## LT2-RFP Joint Session, February 22, 2024

### Feedback Provided by:

Name: Warren Howard

Title: Former Municipal Councillor

Organization: Municipality of North Perth

Date: March 6, 2024

To promote transparency, feedback submitted will be posted on the LT RFP engagement webpage unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "confidential".

Following the February 22, 2024, LT2-RFP joint engagement with Ministry of Municipal Affairs and Housing (MMAH) and Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed during the webinar. The webinar presentation and recording can be accessed from the LT RFP [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by **March 7, 2024**.**

<b>Topic</b>	<b>Feedback</b>
<p>What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?</p>	<p>Given the growth of Ontario's population, all currently available prime agricultural land will be required to support food production.</p> <p>If the current restrictions on using Prime Agricultural Land for energy project are maintained, it will be difficult to identify land area equivalent to fourteen times the area of Toronto in rural communities that can be used for energy projects. As indicated by participants in the IESO Lunch and Learn session at ROMA, this target is unrealistic.</p> <p>This in turns brings into question the whole IESO energy strategy for LT 2 through 5 which seem to be designed without consideration to the amount of rural land that will be required. This land is not vacant so implementation of the IESO plans means that something must be displaced. This is not realistic as it requires so much land rural land.</p> <p>Perhaps a focus on role that urban land can play in supporting energy production should be considered. In addition, less space intensive solutions should be considered in place of wind turbines and solar projects on prime agricultural land.</p>
<b>Topic</b>	<b>Feedback</b>
<p>Given the limited amount of specialty crop areas in the province, how would diverting or restricting energy projects from these areas impact your ability to develop your energy project?</p>	<p>This is a leading question that is very badly worded. Perhaps the individual who drafted the question should actually listen to the presentation as the answer was provided. The guidance does not give a carte-blanche to develop their projects wherever they want – there are rules that need to be followed and alternatives considered.</p>
<b>Topic – Alternate Question</b>	<b>Feedback</b>
<p>Why is there strong support for protection of Prime Agricultural Land in rural communities?</p>	<p>This should not be a surprise to the IESO: protection of Prime Agricultural Land has always been a core concern in agricultural communities across the province. Residents in these communities recognize that value of highly productive land in an area where climatic conditions are suited to production of a wide range of crops. Prime agricultural land is a resource that is protected and passed from generation to generation.</p> <p>This perspective makes rural residents as concerned about Prime Agricultural Land as urban residents are of protecting their Green Belt Open Spaces.</p>

<b>Topic</b>	<b>Feedback</b>
<p>What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?</p>	<p>Based on the discussion in the presentation, the answer should be obvious to the IESO. It is not some hypothetical question but a matter where the Ministry of Housing and Urban Affairs already provides direction in the section on the PPS.</p> <p>The current requirements of the Provincial Policy Statement are to avoid the use of Prime Agricultural Lands for non-agricultural use. The PPS suggests that developers consider alternate sites for these projects including lower class farmland, brownfield sites, etc.</p> <p>The PPS provides that answer to question – alternate sites would have to be considered.</p>
<b>Topic</b>	<b>Feedback</b>
<p>Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?</p>	<p>The presentation gave a good overview of the planning rules around energy projects. The problem would not appear to be clarity about the requirements but rather that the provincial and municipal governments are responding to a broader array of objectives.</p> <p>As discussed with Barbara Adderly, the statement that municipalities should include renewable energy facilities in their Official Plans is not a requirement that rural municipalities must accept all proposed renewable energy projects whether or not they align with the municipality’s objectives. It is just a recommendation for municipal consideration. Urban centres should find energy generation opportunities within their geographic area rather than just outsourcing this production to nearby rural areas.</p> <p>The guidance also allows rural municipalities to identify specific types of renewable energy solutions such as biogas or ground source-thermal that align with their needs rather than a space consumptive project like wind turbines or solar development.</p> <p>Energy projects are recognized as Diversified Farm Use with the Ministry of Agriculture, Food and Rural Affairs providing direction on the size of projects that qualify. These are limited to 2% of the total area of the parcel up to a limit of 1 ha. This limit controls the impact on Prime Agricultural Land.</p>

Topic – Additional Question	Feedback
When an existing wind turbine project has been developed on Prime Agricultural Land, the presentation suggests that this site be used for a repowered project.	<p>Unless the repowering project uses the existing tower and tower foundation as part of the repowered project, this will result in the elimination of more Prime Agricultural land. Most repowering projects will result in longer blades and larger nacelles which cannot be accommodated on the existing towers.</p> <p>These projects will require new towers and foundations which will increase the use of prime farmland as the existing foundations are not removed and the land is not returned to agricultural use.</p>

## General Comments/Feedback

It is surprising that the IESO is asking rural municipalities about relaxing restrictions on the use of Prime Agricultural land for energy projects. In the municipal discussions about BESS projects, the use of Prime Agricultural Land was a frequent concern raised by resident groups, starting with the initial proposals in the Expedited Process. Prince Edward County is a good example of a municipality where residents raised this concern and consequently, the municipality did not provide support for the proposal.

In the LT1 process, the importance of prime agricultural land was repeated in community after community across the province, both in the community meetings and in Council discussions of municipal support resolutions. The desire to protect Prime Agricultural Land in rural Ontario should therefore have been apparent in the IESO’s monitoring of community response to previous proposals.

Increasingly, people are in favour of local food production and supporting agriculture to ensure food security. Industrializing highly productive farmland goes against this global trend. This statement from the [Ontario Farmland Trust](#) underscores the principle:

Every day in Ontario, we lose 319 acres of farmland to non-agricultural land uses like urban development and aggregate extraction; this rate of farmland loss is unsustainable and cannot be allowed to continue. Everyone in Ontario relies on agriculture, from the food we eat, to the jobs in our communities. Without strong protections in place for our farmland, we may not be able to provide enough food to feed our growing population.

Many of these communities have already witnessed the impact of wind turbine developments on Ontario’s productive land. Despite assurances from project proponents, it is simply not possible to return this land back to its pre-project condition. Cement foundations are not be fully removed from the land and gravel roads cannot be returned to pre-construction conditions. Ontario’s citizens do not want these mistakes repeated.

These concerns also motivated the opposition to an LT2 - RFP wind turbine project in East Zorra-Tavistock in Oxford where the community group quickly formed to work against a new wind turbine project being proposed on Prime Agricultural Land. Oxford has some of the best farmland in Ontario and protection of this land was the key point in the group's presentation to Council on Wednesday March 6. The Council responded by adopting an Unwilling Host resolution that indicates that the Council will not support any wind turbine project in the municipality. East Zorra-Tavistock joins the municipalities of Chatsworth and Arran-Elderslie in recently adopting an Unwilling Host resolutions.

Even where BESS projects have been supported on Prime Agricultural Farm Land, you might want to monitor their status as provincial guidelines limit the use of Prime Agricultural Land for BESS projects to one hectare per site. As they move into the site permit process, it will be found that many larger projects violate this provincial standard.

It is not surprising the project proponents want access to this farmland, but the IESO should have known better than to suggest that these restrictions on the use of prime agricultural land be relaxed. The needs for electricity are largely being driven by urban communities and, if more capacity is required, the focus should be on urban communities to generate this power, rather than continuing to treat rural Ontario as wasteland to be exploited by urban centres. The focus of the process can be shifted if bonus points are awarded to projects in urban areas.

The existing rules related to the use of prime agricultural land as outlined by the MHUA and MAFRA are appropriate and should not be changed to accommodate energy projects. If the land requirements (projected to be 14 times the size of Toronto) cannot be accommodated, then the focus of the implementation plans should be shifted to alternatives that consume less space, such as biogas, which likely can be accommodated within the limits of a diversified farm use.