

# Multi Municipal Energy Working Group AGENDA

MMEWG-2024-05

Thursday, November 14, 2024, 7:00 p.m.

Virtually via Microsoft Teams

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<b>Microsoft Teams</b> <a href="#">Need help?</a>	
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Passcode: XqvwDW	
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	Meeting with IESO - Proposed date of December 4, 2024 from 4:00 to 4:45 pm	
11.	Closed Session (if required)	
	Not required.	
12.	Confirmation of Next Meeting	
	Proposed for January 9, 2025 7:00 p.m. via Microsoft Teams	
13.	Adjournment	

**Multi Municipal Energy Working Group  
MINUTES**

**MMEWG-2024-04  
Thursday, September 12, 2024, 7:00 p.m.  
Virtually via Microsoft Teams**

Members Present: Mark Davis - Municipality of Arran-Elderslie - Citizen  
Appointee  
Ryan Nickason - Municipality of Arran-Elderslie  
Scott Mackey - Township of Chatsworth  
Dan Wickens - Municipality of Grey Highlands  
Jim Hanna - Township of Huron Kinloss  
Todd Dowd - Municipality of Northern Bruce Peninsula  
Sue Carleton - Township of Georgians Bluffs  
Stewart Halliday - Municipality of Grey Highlands -  
Citizen Appointee

Others Present: Julie Hamilton - Recording Secretary  
Bill Palmer - Technical Advisor

**1. Meeting Details**

**2. Call to Order**

The Chair and Vice-Chair were not in attendance. Member Mackey volunteered to be the Acting Chair and called the meeting to order at 7:05 pm. A quorum was present.

**3. Adoption of Agenda**

**MMEWG-2024-09-12-01**

**Moved by:** Dan Wickens - Municipality  
of Grey Highlands

**Seconded by:** Ryan Nickason -  
Municipality of Arran-  
Elderslie

Be It Resolved that the Multi-Municipal Energy Working Group hereby adopts the agenda of the Thursday, September 12, 2024 as distributed by the Recording Secretary.

**Carried**

**4. Disclosures of Pecuniary Interest and General Nature Thereof**

There were no disclosures made by the Members.

**5. Minutes of Previous Meetings**

**5.1 MMEWG May 9, 2024 Minutes**

**MMEWG-2024-09-12-02**

**Moved by:** Sue Carleton - Township of Georgians Bluffs

**Seconded by:** Todd Dowd - Municipality of Northern Bruce Peninsula

Be It Resolved that the Multi-Municipal Energy Working Group hereby approves the minutes of the Thursday, May 9, 2024 meeting as presented by the Recording Secretary.

**Carried**

**6. Business Arising from the Minutes**

**6.1 Grey County Committee Report - Battery Energy Storage Systems**

**MMEWG-2024-09-12-03**

**Moved by:** Ryan Nickason - Municipality of Arran-Elderslie

**Seconded by:** Todd Dowd - Municipality of Northern Bruce Peninsula

Be It Resolved that the Multi-Municipal Energy Working Group hereby receives agenda item, 5.1, Grey County Committee Report - Battery Energy Storage Systems, for information.

**Carried**

**7. Delegations/Presentations**

**7.1 Chasing The Wind - Article by Edgardo Sepulveda**

Mr. Sepulveda provided the members with a high-level overview of his article titled "Chasing the Wind" which discusses the value

of wind generation in a low emission nuclear and hydro-dominant grid, the case in Ontario.

He made a presentation to the Members which is appended hereto to form a part of the minutes.

By his calculation, wind should be \$46.00 per MWH, which is much lower than the \$151.00 per MWH that is being paid currently, a result of the contracts that were issued under the Green Energy Act. He provides an analysis of how strong the wind blows in Ontario as compared to the other regions. Ontario's wind power is not aligned with demand. It tends to die in the summer, when the demand is needed the most.

Acting Chair Mackey opened the floor for questions.

Technical Advisor, Bill Palmer, noted a discrepancy in the legend of Figure 7. Mr. Sepulveda concurred and will provide an updated version which has been appended hereto to form a part of the minutes.

Mr. Howard raised the question about whether this information would be beneficial to be sent to municipalities who are potentially going to be faced with wind proposals. Mr. Sepulveda notes that the report shows that wind is not invaluable and we should not be paying more than it is worth for it. One of the objectives of the report was to show that we need to have a balance. Wind is not invaluable, that it is expensive, it has limited use and it has its pros and cons. Municipalities should be given the authority to determine whether wind is a good for them or not. The article provides an economic value to wind so that everyone can make informed decisions.

Acting Chair Mackey questioned what the province was prepared to pay in light of the \$46.00/MWH value in the presentation. Mr. Sepulveda noted that Minister Lecce announced the new round of procurements and has asked IESO to provide more details by the end of September and procurement is expected to be completed by 1st quarter 2026. There is potentially still time to influence what the government is willing to pay and the government is committed to competitive procurement. He would like to see the IESO establish a maximum price of \$46.00/MWH and all bids must be below that. Previous procurement prices have been in the \$80.00/MWH range. Based on the current position of the IESO, they are desperately looking for power and it does not appear that will happen but it is hopeful that this report may influence that.

The report does not consider the cost of the Battery Energy Storage System's required to take the excess power from when the wind is blowing. It takes the grid as is at this point in time.

Acting Chair Mackey thanked Mr. Sepulveda for his presentation.

#### **MMEWG-2024-09-12-04**

**Moved by:** Mark Davis - Municipality of Arran-Elderslie - Citizen  
Appointee

**Seconded by:** Stewart Halliday - Municipality of Grey Highlands - Citizen  
Appointee

Be It Resolved that the Multi-Municipal Energy Working Group hereby receives Mr. Sepulveda's presentation regarding his article "Chasing the Wind"; and

Directs the Recording Secretary to circulate the revised version of the report to Technical Advisor, Bill Palmer, for review and approval prior to circulation; and

That it be forwarded to all member municipalities and all municipalities in Grey, Bruce and Huron Counties.

**Carried**

### **7.2 IESO Update - Warren Howard**

Mr. Howard made a presentation to the Members on the recent updates relating to the IESO energy procurement processes. Since drafting the presentation, new documentation has been released. Mr. Howard will circulate a revised presentation which is appended to these minutes.

Vice-Chair Hanna joined the meeting during the presentation however was having technical difficulties. Acting Chair Mackey agreed to continue as Acting Chair for remainder of the meeting.

Acting Chair Mackey opened the floor for questions and raised a question regarding the current unwilling hosts and Chatham Kent. An unwilling host resolution recently failed in Chatham Kent which ignited opposition to wind turbines. Things are problematic in Chatham Kent because there is a proposal in the

same soil groups as the one in North Kent which has the well water problems.

One additional resolution was added to the list in Algoma District and in the City of Kawartha Lakes, a councillor attempted to have an unwilling host resolution repealed and the motion failed.

There are 159 unwilling host municipalities at this time.

Mr. Sepulveda raised a question if there had been discussions in the IESO process that there be a maximum price for generation resources or how it may be received. Mr. Howard has noted it had not been discussed and recommends working with the minister to provide direction to the IESO on this matter.

Member Davis left the meeting at 8:27 p.m.

Member Halliday noted that Grey County was discussing the impact of the new Provincial Policy and recalls the County in the past had made some regulatory provisions as part of its official plan which may be helpful.

#### **MMEWG-2024-09-12-05**

**Moved by:** Dan Wickens - Municipality of Grey Highlands

**Seconded by:** Todd Dowd - Municipality of Northern Bruce Peninsula

Be It Resolved that the Multi-Municipal Energy Working Group hereby receives for information Mr. Howard's presentation, IESO Update.

**Carried**

### **7.3 Board of Health Delegation Follow Up - Bill Palmer**

Mr. Palmer provided a brief update of his delegation to the Board of Health which has been appended hereto to form a part of the minutes.

Member Halliday enquired how health was defined by Public Health Ontario in relation to physical versus mental conditions. Mr. Palmer noted that Public Health Ontario has determined that wind turbines were not a "direct" public health concern.

#### **MMEWG-2024-09-12-06**

**Moved by:** Todd Dowd - Municipality  
of Northern Bruce  
Peninsula

**Seconded by:** Dan Wickens - Municipality  
of Grey Highlands

Be It Resolved that the Multi-Municipal Energy Working Group hereby receives for information Mr. Palmer's follow up in relation to the Board of Health delegation.

**Carried**

## **8. Correspondence**

### **8.1 Requiring Action**

8.1.1 Letter from Arran-Elderslie Re: Recording Secretary

#### **MMEWG-2024-09-12-07**

**Moved by:** Sue Carleton - Township of  
Georgians Bluffs

**Seconded by:** Dan Wickens - Municipality  
of Grey Highlands

Be It Resolved that the Multi-Municipal Energy Working Group hereby defer this item to the next meeting agenda for discussion.

**Carried**

### **8.2 For Information**

#### **MMEWG-2024-09-12-08**

**Moved by:** Ryan Nickason -  
Municipality of Arran-  
Elderslie

**Seconded by:** Dan Wickens - Municipality  
of Grey Highlands

Be It resolved that the Multi-Municipal Energy Working Group hereby receives, notes and file the correspondence for information purposes.

**Carried**



8.2.1 IESO Feedback Submissions

8.2.2 Minister of Energy Letter - Protection of Agricultural Lands

8.2.3 2024 Unwilling Host Resolutions to Date

8.2.4 Unwilling Host List

## **9. Members Updates**

Bill Palmer attended a presentation by the Local Chapter of Professional Engineers regarding Battery Energy Storage Systems.

## **10. New Business**

The Recording Secretary provided two updates.

The IESO would like to meet with the group in a method other than a public forum. It was discussed that Chair Allwood, Bill Palmer and Warren Howard set up a meeting for discussion with the IESO.

The Freedom of Information request regarding the Skyway 8 turbine failure has been received. There are 1500 pages included. A link will be provided to the members, Warren Howard and Vern Martin to review and a discussion can take place at the next meeting.

## **11. Closed Session (if required)**

Not required.

## **12. Confirmation of Next Meeting**

The next meeting will be held on Thursday, November 14, 2024 at 7:00 p.m. via Teams.

## **13. Adjournment**

### **MMEWG-2024-12-09**

**Moved by:** Sue Carleton - Township of Georgians Bluffs

**Seconded by:** Ryan Nickason - Municipality of Arran-Elderslie

Be it Resolved that the meeting of the Multi-Municipal Energy Working Group is hereby adjourned at 8:52 p.m.

**Carried**

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Tom Allwood, Chair

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Julie Hamilton, Recording  
Secretary



July 29, 2024

Multi-Municipal Energy Working Group

Attn: Chair Tom Allwood

**RE: Arran-Elderslie Supplied Secretary**

Please be advised that on July 22, 2024, the Council of the Municipality of Arran-Elderslie directed staff to prepare correspondence to the Multi-Municipal Energy Working Group regarding the secretarial duties as contributed by Arran-Elderslie.

Council has directed that Julie Hamilton's secretarial duties be paid directly to her from the Working Group commencing January 1, 2025.

Please present this to the Working Group for consideration.

Thank you.

Regards,  
MUNICIPALITY OF ARRAN-ELDERSLIE  
Per:

A handwritten signature in cursive script that reads 'C Fraser McDonald'.

Christine Fraser-McDonald  
Clerk  
[cfraser@arran-elderslie.ca](mailto:cfraser@arran-elderslie.ca)

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Thank you for presenting your seminar on New Battery Technology and Fire Safety Concerns, and to the Georgian Bay Chapter for arranging this seminar. It is an important subject for P.Eng's to be aware of, and for it's implications for public safety, given that the Professional Engineers Act, R.R.O. Regulation 941, requires a professional engineer "to correct or report a situation that the practitioner believes may endanger the safety or the welfare of the public."

As a P.Eng., a former Chair of the Georgian Bay Chapter of PEO, and in my engineering career, this legal (and moral) responsibility of the Act has always been foremost. As a participant in the seminar, I want to apologize to you as speaker, to the Chapter organizers, and to the other seminar participants, if my frequent questions seemed to monopolize the floor at times. There was no intent to prevent others from having their say. As I identified to you during the dinner break, the subject of Battery Energy Storage Systems, is of concern to municipal leaders who had requested me to brief them as a P. Eng. on the subject in March 2023, 18 months ago. A copy of the presentation I delivered to them at the time is attached for your information. As I identified to you at the seminar, the BESS hazards identified in my presentation were as identified in recognized, reputable journals.

You ask in your note, "for any comments or recommendations regarding the seminar." My comments in this response are certainly not a formal "technical review" of your presentation, as defined by the PEO Guideline. My comments are based on personal notes taken during the seminar, so may be influenced from what I thought I heard, rather than what was actually said.

1) You introduced the subject, noting the Canadian Net-Zero Emissions Accountability Act enshrining Canada's commitment to achieve net-zero greenhouse gas emissions by 2050, as a driver for Battery Energy Storage Systems.

- to bring more realism into this goal's objective, it would be useful if your presentation would identify that the Environment Canada website identifies that to achieve this goal will require Canada to "Transition to 100% wind, water, and solar (WWS) for all purposes (electricity, transportation, heating/cooling, industry)" by 2050. (See slide attached from Environment Canada website.) As Professional Engineers with some awareness of what this objective would mean, I suggest it is somewhat irresponsible for us to gloss over this aspirational statement, as if it might be achievable. As I pointed out to you at the seminar, even for Ontario, as only part of Canada, this would mean replacing all of the energy supplied by 1,435 PetaJoules (PJ) of Petroleum products, 935 PJ of Natural Gas, 137 PJ of Biofuels, 127 PJ of Other sources (e.g. coal, etc), as well as the 60% of the 514 PJ supplied by nuclear to the Ontario electrical system, with wind, water, and solar in the next 25 years.

2) Your presentation went on to show that batteries of BESS have 6 applications,

- smoothing renewable supplies of solar and wind
- load shifting
- frequency regulation
- UPS backup power supplies
- voltage support
- and finally energy arbitrage (buying cheap electricity to sell later at a profit)

In fact, in particular for the first identified objective, of smoothing renewables, examination of the actual performance of Ontario wind generators in particular as seen in 3 years of actual IESO data from 2021 to 2023 (attached) you find that the need to shift wind is not so much daily as seasonally. We need the supply on hot sticky summer days (like recently) when wind has a negligible supply, and on cold calm crisp winter nights when again wind (and solar) are minimal. The main advantage BESS will provide is as you say "energy arbitrage" and the main result of this will be to increase the cost to consumers, not to add security.

3) In your discussion of BESS hazards, while you mentioned the risk of older Lithium Ion cells (either LiNMC LiNCA or LiFePO4 cells) "swelling" indicating failure, you failed to identify that this is generally not something that batteries experience immediately when new, but after a number of charge-discharge cycles, or periods of sustained high capacity storage. Thus, in your identification that the safety of Lithium batteries is assured by a charge-discharge-charge-discharge test, you failed to show that safety was assured. This was the point I was trying to make by my question at the seminar that this very limited test should not be considered as assuring battery long term safety. The BESS systems we are installing today are expected to have a lifetime of years, of charging and discharging at high current, or sustained sitting at high charge. These are precisely the conditions that are implicated in cathode/anode partition penetration by dendrites or damage.

4) In your discussion about Battery Management Systems, your discussion about cell balancing was unclear. I heard, (perhaps my error) that you were discussing the importance of cells being balanced by mass on their racks. I did not hear that the goal of a BMS is to ensure cell voltage levels are "balanced". This may have been my error, but perhaps you would check your delivery notes, to ensure that the subject of "balancing" is not misinterpreted by your listeners.

In conclusion, my somewhat cursory review of your presentation left me wondering if listeners adequately understood the hazards, and that they are not addressed adequately by the current codes and standards. Given the risk which I identified in installing major systems, such as the 40 acre, 400 MW, 1600 MWH storage system in the rural municipality of Arran Elderslie, or the proposal of installing a BESS on the border of Owen Sound, under 1 km from the Grey County Offices, the largest public school in Grey and Bruce, of the Regional Hospital, perhaps you may wish to revisit your presentation.

William (Bill) Palmer P. Eng.

# INVOICE

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00000101072  
1380-General Receivables

Invoice Number: 0110582  
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Description	Unit Charge	Qty	Amount
Invoice: 0110582 Multi-Municipal Energy Working Group/Services			
Recording Secretary Serv May-October 2024	35.3600	29.00000	1,025.44
		Billing Amount:	<u>1,025.44</u>

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Invoice Charges	<u>1,025.44</u>
Balance Due	1,025.44

Tax Reg: 87242 7158

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Municipality - Arran-Elderslie  
Telephone - (519) 363-3039

E. & O.E.

London

## Zorra Township says more info needed before approving future wind turbine, energy projects

Township wants to know impacts to agriculture, health and environment

[Erika Chorostil](#) · CBC News · Posted: Oct 18, 2024 7:00 PM EDT | Last Updated: October 23



Zorra Township council voted unanimously this week on a resolution not to give municipal support resolutions (MSR) to wind turbine projects or other future energy projects until they know more about potential agricultural, health, or environmental impacts they could have. (Wayne Parry/Associated Press)

Zorra Township wants more information about potential impacts of energy projects before they give approval of any new proposals.

Their council voted unanimously this week on a resolution not to give municipal support resolutions (MSR) to wind turbine projects or other future energy projects, until they know more about potential agricultural, health, or environmental impacts they could have.

The Independent Electricity System Operator (IESO) and the Ministry of Energy oversee Ontario's power system.

The IESO is focused on procuring about 2,000 megawatts of electricity from new energy sources, as part of the province's Second Long-Term Procurement (LT2) plan.

Through the plan, a MSR ensures municipalities have the right to "obtain project information from any developer" before considering giving approval and sending the



Zorra Township Mayor Marcus Ryan said the township does not have enough information from developers or from the province regarding potential impacts energy projects, such as wind turbines, would have.



Marcus Ryan, the warden on Oxford County and Mayor of Zorra Township, said the township does not have enough information from developers or from the province regarding potential impacts energy projects, such as wind turbines, would have. The township will not approve new energy projects until they have that information. (Oxford County)

Without that information, council does not feel comfortable approving new projects.

"It is really challenging for a municipality to have the information needed to make that decision," he said.

"We don't have a Ministry of Health or a Ministry of Environment or a Ministry of Agriculture to assess these things. But the current process requires us, if we're going to defend the decision, to have that kind of knowledge. So, council said if we're not

informed enough to make a decision, we're not going to do that because we have to be able to defend these decisions to residents."

Ryan said the township is not against installing new energy projects, but they wish the province would provide more information on this as part of the procurement plan.

"Everybody agreed that, we're not saying yes, we're not saying no. We're saying we don't have enough information to say yes or no."

- [Doug Ford shifts direction on wind power in Ontario](#)
- [75 Ontario municipalities call for new rights in wind farm deals](#)

Some residents and farmers in Zorra Township have voiced opinions on wind turbine projects, with Ryan saying some have said they're in favour of them and others are against the idea.

Feedback from both sides is also something that Lee Griffi has heard. Griffi is editor and main contributor of the Woodstock Ingersoll Echo who has been following the developments in Zorra Township.

"Those in favour kind of stay quiet," said Griffi.

"The people that want them on their lands to make some money and then maybe they believe in green wind power and that's of course totally their choice, but they're the quiet ones. It's the ones who don't want it who are the noisy ones."

In a statement to CBC, a spokesperson for the Ontario energy minister's office said the province will not impose energy projects onto communities and "always supports the will of municipalities."

The spokesperson said the provincial government will continue to work with municipalities "to meet the increased demand for energy across Ontario by delivering clean, reliable and affordable energy across the province."

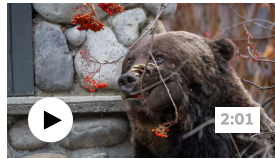
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**VIDEO**  
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**VIDEO**  
**What to expect in the first 100 days of Trump's 2nd term**



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CBC News: Calgary At 6:00

The National

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Thomas Daigle  
Canada - Toronto



**Ham at do had ' cons**

Saira  
Cana



Motion passed by a recorded vote of 5-0 on October 16, 2024 by the Council of the Township of Zorra

Moved by Mayor Marcus Ryan

Seconded by Kevin Stewart

That Report No. 2024-131 REA Process be received and filed;

AND WHEREAS the procurement of electrical energy is the responsibility of the Province of Ontario;

AND WHEREAS the current Independent Electricity System Operator procurement process requires a Municipal Support Resolution for all energy projects before any application will be considered;

AND WHEREAS the current procurement process does require an Agricultural Impact Assessment, but only within 18 months of receiving a contract, which would be after a Municipal Support Resolution;

AND WHEREAS the Township of Zorra does not have, nor should be expected to have, the expertise or resources necessary to make an informed decision as to whether or not to provide a Municipal Support Resolution for an energy project;

THEREFORE BE IT RESOLVED that until the Ontario Government, Ministry of Energy and Electrification, and the Independent Electricity System Operator changes the procurement process to allow municipalities to be better informed on issues such as, but not limited to: agricultural impacts, health impacts, environmental impacts, the Township of Zorra will not be providing Municipal Support Resolutions;

AND THAT this resolution be forwarded to Oxford County, Oxford MPP, Minister of Energy and Electrification, the Western Warden's Caucus, and the Association of Municipalities of Ontario.

## **MULTI-MUNICIPAL ENERGY WORKING GROUP**

### **Independent Electricity System Operator**

### **Special Meeting Talking Points**

#### **Safety of Our Citizens is of Prime Importance**

- As Municipal Leaders, we are mandated by the *Municipal Act, 2001, as amended* to provide measures necessary for the health, safety and well-being of citizens within our jurisdiction.

#### **No Update to Wind Turbine Setbacks**

- At current setbacks, a significant number of residents have identified irritation and health impacts. Many have given deputations to MMEWG and its predecessor MMWTWG.
- The derived 550 metre setback was based on audible turbine sound output of early 2000's. Current larger turbines have greater low frequency component and the setback need to be based on the full turbine sound power profile.
- Municipalities know that current setbacks do not protect residents and are resisting new installations until they are fixed.

#### **Repowering of Wind Turbines on Existing Footprints**

- Setbacks for tower collapse remain insufficient. The current blade length plus 10 metres requirement not a strong enough protective measure for existing projects, let alone repowered turbines on existing footprints.
- Setbacks for ice throw are also insufficient, as the blade length plus 10 metre setback is less than the ice throw distance witnessed in Ontario.
- Ontario has witnessed turbine fires and flaming debris on the ground at 200 metres, while setback was 50 metres.
- A Ministry review failed to recommend industry standard protective barriers for fire suppression in spite of examples of fires in similar turbines.

#### **Social Implications of Wind Arrays on The Neighbours**

- We've heard from citizens impacted in those communities, such as Kingsbridge 1, which is currently under discussion, and, similarly, as arrays such as Acciona Ripley and Enbridge Underwood will come up for extension soon,
- Extending life based on approvals granted 20 years ago for regulations that are not even within today's inadequate regulations should not be a foregone conclusion.

#### **Municipal Support Requirement**

- Processes around requests for municipal support need to be clarified for example:
- **Ashfield-Colborne-Wawanosh** - Clerk advised residents that the municipality has no role in the process when approached by Capital Power to support extension of the contract:

- No public meeting was held with only letters from leaseholders presented in support of change.
- No discussion of compliance with current noise standards, no discussion of fire risk and no clear details on changes proposed provided.
- **Arran-Elderslie** received request for municipal support for a BESS project with **no** supporting details. Municipality provided approval in principle and the IESO has offered a contract to the proponent.
- Review of proposed site indicates that it is in the flood plain for the Saugeen River and the development is unlikely to be supported by the conservation authority.
- Site is also on the boundary between Arran-Elderslie and Chatsworth. Chatsworth will be affected but was not asked for municipal support.
- **City of Ottawa** – considered 4 requests for municipal support for BESS projects and supported one project.
- The IESO issued 2 contract offers including one of the projects that failed to receive municipal support.

### **Unwilling Host Municipalities**

- 155 municipalities have declared themselves to be "Unwilling Hosts" to new wind projects.
- Issue raised by the Deputy Mayor of Southgate in one of the webinars.
- Situation not addressed with wind companies as prospecting continues in Unwilling Host communities.
- MMEWG circulated a letter with a draft unwilling host resolution to all municipalities for consideration and has received copies of resolutions passed by a number of municipalities in support of the MMEWG resolution.

### **Absence of guidance on BESS safety for municipalities**

- Each municipality expected to develop their own assessment of the risks.
- Experience with real emergency situations suggests that setbacks of 800 metres are required.
- MMEWG has solicited input from Ontario Fire Marshall, but received no substantive response. Hydro One has reviewed situation and provided guidance on setbacks needed to protect their infrastructure from fires in BESS projects.
- Depending on small regional fire protection services, such as the Arran-Elderslie volunteer fire brigade to protect the 400 MW array on the ISEO list in Arran Elderslie.
- The siting plan of a BESS array on the border of Owen Sound, near a major public school, the regional hospital, and the Grey County Offices, without notification of Owen Sound or Georgian Bluffs which is responsible for providing fire protection to the area occupied by the project.