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Sent: April-13-11 2:29 PM
To: 'renewable.mnr@ontario.ca'
Subject: EBR REGISTRY NUMBER: 010-7895 - SITE RELEASE POLICY
Importance: High

I realize the comment period for Phase One of this EBR is complete, however, the Ontario Rivers Alliance (ORA) would like to comment before Phase 2 begins in the hopes the following suggestions will have an influence on what comes out in Phase 2.

The following comments are offered with the intent of improving the Site Release policy:

ORA is suggesting much more groundwork be undertaken, as well as consultation with the public and stakeholders, by the Applicant, before a Site Release is granted. There is no point in going through the Environmental Assessment process, unless the Community, Stakeholders, and the Municipality have first given their consent. This Site Release Policy is important groundwork that must be completed and approved of before any Notice of Commencement is issued.

There must also be a requirement for determination of viability of a project; as well as a potential risk assessment and net power forecast before any Notice of Commencement is issued or Environmental Assessment begins. These steps would save the Provincial Government much time and money in processing an application that is not wanted or viable. Also, the Ministries must monitor progress and enforce their regulations strictly to ensure compliance by the Proponent.

1. Waterpower sites will have an effect on Municipalities, Communities and Riparian landowners upstream and downstream, and therefore must be consulted in this first phase to determine whether a proposed project is warranted or wanted – this one important step alone will save countless tax dollars.
2. Site Release must be dependent upon approval and consent of the Community, Stakeholders and the Municipality.
3. Applicant must determine net power generation potential, based on 3 years of seasonal flow reports – what net power generation will the river produce annually?
4. Total square kilometers of land inundation by head ponds of project/s?
5. Realistically weigh potential cumulative effects and impacts (loss of water quality, total square kilometers of inundation area, habitat, aquatic life, and archaeological resources, recreational paddling sites, etc.) against the forecasted net power generation to determine feasibility.
6. Clear milestones and adherence to the Site Release Policy - Applicant be required to obtain an Applicant of Record and Site Release before the Notice of Commencement is advertised. Any applicant who is not in compliance would lose their FIT Contract.
7. Stakeholder and/or Public intervener funding be made available for expert environmental assistance, research and studies to determine possible impacts.
8. A fully transparent and open process where all information concerning the application, project, minutes of meetings and reasons for decisions are fully accessible to all Stakeholders.

Currently a Proponent has several proposed projects where the first Notice of Commencement was advertised in July of 2010, and to date, April 2011, has never been granted an Applicant of Record or Site Release. This demonstrates a lack of adherence to process, oversight, and enforcement on the part of the Ministries.

A Site Release Policy where Municipalities, Stakeholders, Communities and Riparian landowners have no control over whether a waterpower project goes ahead; or where “no” is not a possible outcome, is undemocratic and has no place in our government policy or process!

Linda Heron
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Chair, Ontario Rivers Alliance