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6 May 2011

The Honourable John Wilkinson
Minister of the Environment
77 Wellesley Street West
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Dear Minister Wilkinson:

Re: Bala Falls Proposed Waterpower Project

The Ontario Rivers Alliance (ORA) is an organization with a focus on healthy river ecosystems throughout the Province. Therefore, we wish to comment on the current proposal for a hydro generating facility at Bala Falls.

ORA has reviewed the Director of the Environmental Assessment and Approvals Branch's recent decision for the proposed North Bala Falls Hydro Project and we are dismayed at the lack of solid science and the lack of a fact-based process.

As noted in National Geographic's "10 Best Trips of Summer 2011", Muskoka's natural beauty is a precious and unique resource that drives tourism and the area's economy. While the environmental assessment process is supposed to examine such economic impacts and their mitigation, we find this has not been done in the case of the Bala Falls proposal.

There is too much at stake – the public safety problems and the economic and environmental impacts would be irreversible and yet we do not see any evidence that the Environmental Assessment (EA) process has ensured "the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment" [1].

ORA is deeply concerned about many aspects of the Bala Falls proposed hydro project and the Director's Report.

- (1) Lack of a proper Economic Impact Study: The Director's Report acknowledges that "the actual impact (positive or negative) the proposed project will have on the local economy could not be

determined" because the relevant economic data for the Village of Bala "is non-existent"! If this is actually the case, then it is critical that the required economic data be acquired *before* a decision is made on whether or not to proceed with the proposed project. And that the data be evaluated in a proper Economic Impact Study.

- (2) Safety concerns not addressed: The Director's Report dismisses concerns about the safety of boaters and swimmers in the vicinity of the proposed hydroelectric development, but provides no evidence that the proposed measures (e.g. restricted area of 100 m upstream of the intake and 10 m downstream of the tailrace) will be adequate.

The Director's Report further states that OPG warnings and regulations concerning the dangers of dams, hydroelectric stations and the surrounding waterways "do not apply to the proposed project". Why would OPG standard safety warning and regulations not apply at Bala Falls? Does this mean that the proposed Bala Falls development will not meet the same safety standards that are in place at other similar Ontario hydro projects operated by OPG?

- (3) Restricted access to the falls and related effects on tourism: Bala Falls is an important scenic attraction. The effects of restricted access to the public near the falls, reduced water flow over the falls, and the altered appearance of the falls are key elements in determining whether it will continue to be an important tourist attraction. Yet these key elements are dismissed in the Director's Report, which states that they have not yet even been determined. In particular, it is indicated that "details of visual elements of the Project, such as direct access to the shoreline ... will be determined during the detailed design phase", and that the water "flow distribution proposed in the ESR is preliminary estimates and subject to change during detailed design". This lack of information on the proposed project is not acceptable. The visual effects of the proposed project, the access to the shoreline, and the flow over the falls must be determined *before* a decision is made on whether to proceed with the proposed project.
- (4) Environmental concerns not addressed: ORA is concerned that environmental concerns related to fish populations, fish habitat (especially spawning beds) and water pollution have been dismissed in the Director's Report without any detailed information on how these problems will be addressed, either during the construction phase involving excavation and blasting, or in the operation stage of the proposed project.
- (5) Cumulative effects not addressed: The Director's Report has dismissed various concerns individually. However, the cumulative effects of these numerous concerns must also be fully considered, and a precautionary position taken by a provincial authority who's vision and mission is an Ontario with clean and safe air, land and water that contributes to healthy communities, ecological protection, and environmentally sustainable development for present and future generations.

In light of the numerous concerns, which ORA feels have not been adequately addressed, and out of respect for the mass public disapproval of this proposal, we request that an Individual Environmental Assessment be required for this proposed project, so that the public can be assured that the negative environmental impacts have been adequately mitigated.

However, we are alarmed to have learned that all such elevation requests in the last ten years have been denied. This is totally unacceptable, and indicates that the EA process is broken and is not adequately serving the public's interest. We therefore request that you intervene as is your power and authority, and vary the Director's decision.

Thank you.

Sincerely,

Linda Heron, Chair
Ontario Rivers Alliance

References:

- [1] Environmental Assessment Act, R.S.O. 1990, Chapter E18
Part 1, Section 2 – Purpose of the Act.

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