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Jennifer Keyes, Manager
Great Lakes and Water Policy Section
Ministry of Natural Resources
5th Floor North
300 Water Street
Peterborough, ON K9J 8M5
Email: Jennifer.Keyes@ontario.ca

Dear Jennifer:

Re: Water Management Plan – Policy Review

Further to our recent conversation in which we discussed the possibility of a stakeholder meeting sometime in August to discuss our challenges and concerns with the current Water Management Plan Policy, Ontario Rivers Alliance's (ORA) is providing our comments for your consideration and discussion:

- 1. Changes to Operating Strategies without EIS:** Hydroelectric generating stations which have historically been run-of-river are now cycling and peaking to take advantage of peak demand incentives, while no environmental impact studies have been completed to determine the potential environmental or ecological impacts, or the risks to public health and safety.
- 2. Public Safety and Environmental Concerns must take Priority:** The quest to maximize energy production and/or profits should not be allowed to override public safety and environmental concerns when negotiating the Water Management Plan (WMP).
- 3. Environmental Flow Provided for All Hydroelectric Generating Stations:** Many older hydroelectric generating stations have historically had no environmental flow provided – except for what happens to leak from between the stop-logs – a minimum environmental flow must be provided at all hydroelectric facilities.
- 4. No Gaps in Protection:** Water Management Plans (WMP) often remain in draft form for several years, leaving hydroelectric operations without binding conditions to protect the public, environment and the riverine ecosystem – there should be no gaps in protection.
- 5. Monitoring and Enforcement:** Currently, even when WMPs are finalized and approved, adherence is not adequately monitored and enforced.
- 6. Adaptive Management Practices:** Adaptive management practices must be followed to ensure the riverine ecosystem and public health and safety are not jeopardized.

7. **Community Advisory Panel (CAP):** Concerned First Nation and community organizations would select a CAP, comprised of local stewardship organizations, members of the community, and First Nations, to consider and make recommendations to the waterpower producer and MNR with respect to public concerns, negative impacts, challenging flows, water quality and quantity issues, and possible solutions through mitigation measures, and/or adjustments to operating strategies. This would be an independent Panel, not chosen or controlled by the developer, or MNR, and must be assured of a strong voice in the decision making process. Such ongoing community input would mesh with adaptive management practices, and allow for timely mitigation of harmful impacts.
8. **WMP to be Negotiated and Approved with Environmental Report:** WMPs are currently negotiated after hydroelectric facilities are built – ORA is recommending that a WMP would be negotiated and approved at the same time as the Environmental Report.
9. **Cumulative Effects:** The cumulative effects of hydroelectric generation facilities, water control structures, waste water treatment facilities, municipal drinking water intakes, irrigation, and mining/industrial water taking and effluent discharges on a river system must all be considered under the WMP.
10. **Operating Strategy Stipulated:** Currently there is a huge leeway for frequency of water level changes as long as maximum and minimum levels are maintained. Stipulation of frequency and degree of water level and flow changes must be clearly set out and adhered to.
11. **Climate Change:** Climate change and its effect on water quality and water quantity must be fully considered and planned for when considering the WMP.
12. **Environmental, Scenic and Recreational Flow:** For those towns and municipalities relying on environmental, scenic and/or recreational flow, the social and economic impacts must also be seriously considered in the WMP.
13. **Consistent Terminology:** Terms such as run-of-river, cycling, peaking, and others, must be standardized and approved for a clear and transparent consistency and understanding.
14. **Dam Decommissioning:** With climate change upon us, and scientists predicting a future of increasing temperatures and extreme drought conditions, resulting in evaporation of surface water resources, and lower water levels and river flows, dam decommissioning provisions must be provided up-front by developers if/when these dams are no longer environmentally, ecologically, socially and/or economically viable.

As I mentioned in our telephone conversation Jennifer, ORA is a registered Not-for-Profit grassroots coalition with a focus on healthy river ecosystems all across Ontario. ORA members represent numerous organizations such as the French River Delta Association, Vermilion River Stewardship, CPAWS-Ottawa Valley, Council of Canadians, Friends of Temagami, Paddle Canada, Whitewater Ontario, Mississippi Mills Riverkeepers, along with many other stewardships, associations, and private and First Nations citizens who have come together to support healthy river ecosystems in Ontario, and to ensure watershed development is environmentally, ecologically and socially sustainable.

You mentioned meeting in the Sudbury area in mid to late August, so I am suggesting the 29th or 30th of August as two possible dates. I talked to Paul Norris and he has set aside those dates. I am also copying this letter to Carolyn Hunt, who heads up the Environmental Group for Vale, and has been instrumental in the draft Spanish and Vermilion River Water Management Plan.

ORA looks forward to meeting with you to discuss solutions to these and other water management planning concerns.

Respectfully,

A handwritten signature in black ink, appearing to read "L. Heron", with a long horizontal flourish extending to the right.

Linda Heron
Chair, Ontario Rivers Alliance

Cc: Paul Norris, OWA - PNorris@owa.ca
Carolyn Hunt, Environmental Group, Vale - Carolyn.Hunt@vale.com