

33 Woodland Trail
Lakehurst, ON
K0L 1J0

November 1, 2013

The Honourable Jim Bradley
Minister of Environment
11th Floor, Ferguson Block
77 Wellesley Street West
Toronto, ON
M7A 2T5

Email: Minister.MOE@Ontario.ca

Subject: Wabagishik Rapids GS - Proposed Waterpower Project Part II Order Request

I am writing to inform that the Environmental Report for the Wabagishik Rapids GS is woefully inadequate for the following reasons:

1) Contaminated Sediments

While it is well known that there are contaminated sediments in the lake (a 1986 MOE Sediment Study for Wabagishik Lake reported sediments containing heavy metals such as nickel (24 times over the severe effect level (SEL), copper (5 times over the SEL), arsenic (3 times over the SEL); lead (1.5 times over the SEL), iron, and manganese over the SEL, and zinc, chromium and cadmium at elevated levels), the Environmental Report largely dismisses this issue without collecting any recent data. This is a serious oversight as the impoundment and operation of the facility may interact with the sediments in ways that re-suspend and mobilize contaminants possibly impairing water quality, aquatic life and public waters used for drinking and swimming.

2) Fish Passage, Spawning and Fish Species at Risk

The report notes the presence of the threatened Lake Sturgeon in the area and that an important spawning area for several species will be destroyed by the footprint of the facility. There has been no movement or spawning studies of fish species in the area impacted therefore it is impossible to determine to nature and extent of impact by the facility. Note that dams and hydroelectric facilities have been identified as a key threat to the recovery of Lake Sturgeon by

fragmenting habitat in Ontario's Recovery Strategy for Lake Sturgeon, yet no provision for fish passage has been contemplated, instead additional fragmentation is planned. The proposed replacement of spawning substrate does nothing to address the fragmentation threat and the potential for successful replacement of spawning substrate in the area below has not been examined. A much more thorough analysis of impacts, examination of mitigation potential, and development of mitigation strategies is required, especially for the threatened Lake Sturgeon.

3) Cumulative Effects

Cumulative effects of many existing and planned developments have not been adequately identified nor have the impacts been adequately assessed. For instance, the cumulative effects of: the three additional proposed hydroelectric facilities planned for upstream of the Wabagishik Rapids site; the City of Sudbury Wastewater Treatment Facilities (which release treated, undertreated and untreated effluent), the heavily contaminated sediment; as well as the planned and existing mines and other operations taking water and releasing effluent into the Vermilion River Watershed need to be assessed in addition to the effects of the Wabagishik Rapids GS of aquatic life, water quality, water quantity, and other uses.

4) Impounding Effect on Water Quality

There has been minimal treatment of the effect of the impoundment and operation of the facility on water quality. For instance, impounding water can exacerbate the effects of elevated phosphorus, leading to algal blooms etc. Since seasonal increases in nutrients can be expected, this needs thorough study and reporting.

Having reviewed the Class Environmental Assessment Report and supporting documentation for the proposed Wabagishik Rapids GS, I have found several serious shortcomings and am therefore requesting a Part II Order be issued to elevate this proposal to an Individual Environmental Assessment. I plan to provide additional comments next week.

Sincerely,

Rob MacGregor
khideaway@bell.net
705-741-6887

Stephanie Hodsoll, Stakeholder Relations Officer – Shodsoll@Xeneca.com
Ellen Cramm, Environmental Planner/EA Coordinator - Ellen.Cramm@Ontario.ca
Christine Selinger, MNR – Christine.Selinger@Ontario.ca
Chief Steven Miller - Atikameksheng Anishnawbek – Chief@WLFN.com
Chief Shining Turtle – Whitefish River First Nation – Chief@WhitefishRiver.ca
Art Jacko, Economic Development Officer, UCCMM – Ajacko@UCCM.ca
Erik Szkokan-Emilson - ErikJohnline@riseup.net