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The Honourable Jim Bradley
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Subject: Wabagishik Rapids GS - Proposed Waterpower Project Part II Order Request

Further to my November 3, 2013 letter, I am writing to provide additional comments. At this point I should add that I have no particular problem with hydro-electric facilities in general provided that: (1) they are sited where they make sense ecologically, (2) the site specific and cumulative impacts have been thoroughly assessed at the local level, and in the context of the watershed, using a meaningful ecosystem approach, (3) that acceptable and effective mitigation techniques can and will be deployed to offset the impacts, and (4) that residual impacts are effectively addressed through compensation plans.

Having looked at the ER once again and given it more thought I offer the following additional comments:

Site

While I recognize the site of the proposed facility may offer some potential for waterpower, the proposed site is in the middle of an excellent spawning area for walleye and likely sturgeon if they were more abundant. In fact it may be one of the best in the watershed for both species (this needs to be examined more thoroughly). There are additional hydro-electric facilities on the watershed that are already having ongoing impacts on sturgeon and walleye, fragmenting the habitat and fish species, by limiting or excluding upstream movement and access to important habitat. There is a very small and fragile population of the threatened Lake Sturgeon in the downstream reaches of the Vermillion River that has already been isolated because of a downstream facility. In addition, the walleye population in the river is already fragmented and under some stress.

There has been no data to confirm that there is not an upstream and downstream connection between the river and lake in terms of recruitment and production. Indeed, I expect there is (or was historically) before the impacts of development occurred.

Siting this facility in the middle of the spawning bed, and potentially further fragmenting the fish from what may be good productive lake habitat is a very important decision that cannot be taken lightly. Moreover, there is only limited information on other species that may travel back and forth between lake and river.

The options for recovery and sustainable management of sturgeon and walleye alone may be severely limited if this facility is installed at this site without a complete understanding of the ecological connections between the river and lake. While the proposed facility will harness a renewable energy source, there are other valued renewable resources (e.g. fish) that will be inevitably impacted by this facility at this location. The ER cannot clearly identify all the impacts that may occur without collecting and analysing important features of the lake habitat and the movements and connections between the lake and river.

The site of this proposal will have obvious impacts on other renewable resources (e.g. destruction of the spawning bed), and there may be many more relating to impounding effects and the lack of fish passage. It is impossible to assess their significance without the appropriate information, but (per my last letter) unfortunately the ER has not ensured collection of such information.

My previous letter has indicated some of the important features needing further information, including:

- a) The potential for movement between lake and river of species such as sturgeon, walleye and other species
- b) Some critical water chemistry data for the lake (P, N, TDS, Oxygen, mercury, etc.) that may be influenced by impoundment
- c) Sturgeon recovery potential within the lake and river and potential threats
- d) Relative importance of Wabagishik Rapids to fish and other biota within the watershed
- e) Impounding impacts on the water chemistry, sediments, contaminants, etc., in Wabagishik Lake
- f) Other ecological connections between the river and lake.

In summary, this proposed location for the facility is in a very sensitive location, and I recommend collecting very thorough information before approving this location. The known impacts to known VECs will be significant, and there are potentially many more impacts and VECs but the data has not been collected. If a waterpower facility will be installed at such a sensitive site, surely the potential risks merit the collection of the appropriate data. Only after a thorough evaluation of whether the effects can be successfully mitigated or offset can this site be released or approved.

Cumulative Effects

This site is within a watershed that evidentially has been heavily impacted by past waterpower facilities, just in terms of fragmentation and fish passage alone. In addition, several more such facilities are proposed within the watershed. This proposed facility, combined with other past and foreseeable impacts, is an excellent example of why cumulative effects assessment should and must be done within an ER before approvals are given. I have enclosed a manual if you wish to learn more about Cumulative Effects Assessment (CEA) and how it is carried out. While the ER attempted to carry out a limited CEA (and I applaud the authors for acknowledging its importance), it was largely carried out only to examine effects on water supply to other waterpower facilities. However, the past environmental impacts have

not been identified (e.g., past effects on sturgeon and walleye) although the effects of the existing facilities on fish passage and fragmentation alone seem starkly obvious. And for some reason the effects of potential cumulative effects for future facilities will only be discussed if a decision is made to pursue them. This is a significant omission because if Wabagishik Rapids GS is approved without analysis of the potential cumulative effects of these other potential facilities, it will be too late to consider Wabagishik GS in this context later and take any corrective actions that may be necessary in this context. Clearly, further fragmentation of fish and fisheries would occur under this scenario and other environmental effects that could further exacerbate effects at Wabagishik. Given that hydroelectric facilities are known to have highly cumulative effects on aquatic ecosystems and fisheries, I recommend that this be explored now before approval of the ER so that the potential effects are transparent to all before approval. It could be too late to take effective mitigative action later, and it may not be cost-effective.

Compensation Plan

The proponent has said they are committed to ensuring appropriate compensation plans but once this ER is approved it will be difficult for agencies to negotiate effectively. I would recommend developing the details as much as possible so that all are comfortable that they will effectively offset all residual impacts. There is insufficient information in the ER to determine what needs to be compensated until the aforementioned information in this and my previous letter is collected. In my opinion, there is a need to consider the lake-river connections in much more detail before finalizing the plan. It is never too early to start but it should not be finalized until much more is known. At this stage, as noted in my previous letter, I can only indicate that there is limited assurance of success for the existing draft plan without much more information. The evaluation for success criteria are too nebulous to be able to determine if the compensation plan works effectively, and should be fleshed out in much more detail.

Final Thoughts

It is unfortunate that I did not comment earlier; nevertheless, my comments are intended to be helpful. While I understand the benefits from waterpower, I fear that the sensitive location of the proposed facility merits far more scrutiny than is contained in the current ER. The missing information concerning the ecological connections with the lake, the focus on downstream impacts while essentially glossing over lake impacts, the serious oversights in movement and historical fish distribution, and major oversights in the cumulative effects assessment are all reasons to go back and do more work. The consequences to species recovery and sustainable management in the future may be significant.

For instance, decisions on fish passage alone are significant in terms of effects on fish populations and fisheries. It is unlikely that major interruptions to fish passage can be compensated for by replacement of spawning substrate downstream, or streamside hatcheries, etc. Some basic information on fish movements can be easily collected by telemetry and other assessment techniques that will enable a far better understanding of the effects of the impacts of the structure. Similarly, it would be a simple exercise to collect and include the basic water chemistry, physical and biotic information in the lake necessary to understand environmental impacts of impounding the water. Finally, it would be a straightforward exercise to consider within the ER the past and future cumulative effects at a reasonable level of detail.

I apologize for entering the discussion so late, but I felt the issues were significant enough to add what I hope are helpful comments. A complete understanding of the impacts are not provided so any discussions on mitigation and/or compensation needs should be treated as preliminary until more

information is available. In addition, the impacts of this and other such developments on future recovery plans for Lake Sturgeon should be carefully thought through.

This is my advice from afar and I may travel up shortly to see the site. I am sure a good solution is possible; but not without the correct information.

Sincerely,

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