



379 Ronka Road  
Worthington, ON  
P0M 3H0  
(705) 866-1677  
[LindaH@OntarioRiversAlliance.ca](mailto:LindaH@OntarioRiversAlliance.ca)  
[OntarioRiversAlliance.ca](http://OntarioRiversAlliance.ca)

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The Honourable John Wilkinson  
Minister of the Environment  
12<sup>th</sup> Floor, 135 St. Clair Avenue W.  
Toronto, ON  
M4V 1P5  
[JWilkinson.mpp.co@liberal.ola.org](mailto:JWilkinson.mpp.co@liberal.ola.org)

Dear Minister Wilkinson:

**Re: Part II Order Request  
Class Environmental Assessment Report for the Proposed Ivanhoe River –  
The Chute Generating Station**

The Ontario Rivers Alliance (ORA) is an organization with a focus on healthy river ecosystems throughout the Province, and represents some 30 organizations and groups across Ontario.

On 12 August, ORA submitted detailed comments and questions to Vanesa Enskaitis, of Xeneca Power Development Inc, as instructed in the Notice of Completion. To date ORA has not received a response to our comments or questions, other than an acknowledgement that our letter had been received. Consequently Xeneca has not yet engaged in the EA protocol of communication which is set out in their own Notice of Completion, which was to “*allow the stakeholder a significant period of engagement during the remainder of the review period to work with Xeneca toward a resolution of the issues*”.

Additionally, none of the questions or comments made to Xeneca have been addressed. ORA therefore would like to draw your attention to the following:

**1. Cumulative Effects**

**“Modified Run-of-River Operation”** – water flow will be held back during non-peak hours for production during peak demand hours for anywhere from 7 to 48 hours, depending on the river flow levels; and could result in:

- a. **Elevated methyl mercury**

- i. Appendix C – Page 241, April 19, 2011 – Minutes of EA Coordination Meeting - MOE (ES) – *“ES noted that additional information was required for the PTTW application and that methyl mercury resulting from the impoundment of water was of concern to the MOE.”*
- ii. ER – p-77, Environment Canada, *“It was noted that further consideration was required since the undertaking would result in the creation of an upstream head pond, presenting the potential of an increase in mercury levels in both surface water and fish tissue.”*
- iii. Increased mercury levels in fish tissue are a known health hazard, particularly to pregnant women and their unborn children. In this area native communities depend upon the protein of fish in their diet, and increased mercury will be a future health hazard to these communities, other local stakeholders, and anglers.
- iv. Environment Canada states, *“Levels of mercury, unlike PCBS and DDT, have increased in the past 20 years in fish eating birds and mammals. A striking example is the twofold increase from 1975 to 1995 observed in mercury in the thick billed murre eggs in the Canadian high arctic (Braune et al. 2001)”*.
- v. Another independent line of evidence that mercury inputs to remote locations have been increasing comes from profiles in sediment cores. These also infer that inputs have increased greatly relative to pre-industrial times.
- vi. Increased production of mercury methylation is a well-known problem with water held in holding ponds – see P-69, Environment Canada. 2001. Threats to Sources of Drinking Water and Aquatic Ecosystem Health in Canada, National Water Research Institute, Burlington, Ontario. NWRI Scientific Assessment Report Series No. 1. 72p - Page 69.

#### **Impacts of Dams/Diversions and Climate Change**

- Note:**
- 1) Core sampling must be undertaken to identify mercury levels that exist today in the inundation zone, to establish a baseline.
  - 2) There must be a scientific study based on probable mercury loading at the site to
    - extrapolate the future mercury methylation rates, and their potential effects on the local fish community; and
    - assess the anticipated health threats, over the 40 year contract for this proposed facility, to aboriginal and local stakeholders who rely on the aquatic life as a food source, and on the river water for drinking.
- b) **Warming of water in the head pond**
- i. Xeneca is proposing a 6.4 km head pond and refers to it as *“quite small”*, which is a relative term, but in fact the headpond will consume an overall surface area of 59 hectares, or 146 acres – hardly *“small”* by most peoples’ standards.
  - ii. In Annex B – p-51, The ER dismisses the potential for warming of water in the headpond, *“Due to the small amount of storage in the headpond (a*

*few hours at most flows), there is not enough residence time to significantly alter water temperatures. Further, any temporary storage would occur during the nighttime hours when additional solar absorption is limited”; and yet:*

- Xeneca contradicts itself because on the very next page, of Annex B – p-52, Xeneca states, *“Due to the limited storage at The Chute, all inflow from upstream will be passed downstream within 48 hours” – hardly “a few hours”;*
- Peak demand hours are from 11:00 am to 7:00 pm and during the summer months daylight spans from 6:00 am to 9:30 pm roughly – that would mean water would sit for 7 1/2 hours, exposed to solar absorption – not to mention the possibility of it sitting in the headpond for “48 hours”, hardly *“during nighttime hours”;* and
- In ER, Table 3: Operating Mode Occurrence by Season, it indicates Low Flow occurs at the rate of 33% in summer and 36% in Fall, and these are the times water will be held back the longest, and the months with the greatest number of solar absorption hours.

- iii. So during the summer season when water levels and flow rates are at their lowest, this is when water will sit the longest in the headpond, and because flow rates are slower it will take longer to fill, which would mean a greater potential for warming, as well as exposure to solar absorption for approximately 15 of those 48 hours.
- iv. It is well known that impoundments, warmer waters, and stagnation, combined with flood events, all lead to a concentration of more waterborne pathogens and algal toxins.

- Note:**
- 1) ORA points out that this ER does not address the expected impacts to local stakeholders and aboriginal communities with this anticipated increase in pathogens and algal toxins, and this must be addressed.
  - 2) ORA also requests more detailed information on the effects this thermal regime will have on known populations of sensitive coldwater species such as brook trout and ling, or the impact of construction/operation of this facility would have on the ability of the up and downstream reaches to support sensitive coldwater species.

c) **Town of Foleyet Effluent Concern**

Xeneca totally missed the point in their June 6, 2011 response to Tim Mutter’s concerns about *“effects on effluent dilution at the Town of Foleyet”*, answering, *“The upstream inundation extent up the river is approximately 6.4 km (including dynamic backwater effect). The effluent pond at Foleyet is located at approximately 19 km up the river. An effect on the effluent pond will not occur due to this project.”*

- i. The Town of Foleyet is also concerned about the potential for low water levels and floods in the spring – The Chute GS creates another potential for ice blockage and could cause water to back up into the Town of Foleyet.

- ii. ORA's position is that any effluent discharge from Foleyet, if allowed to sit in a head pond exposed to solar absorption, and warming for 7 to 48 hours, could add to an already simmering brew and create a bacterial soup, having devastating effects on the riverine ecosystem, both upstream and downstream of The Chute GS.

- Note:** 1) A detailed analysis must be undertaken to demonstrate that the above scenarios WILL NOT happen.
- 2) The ORA requests a study to determine the potential environmental effect of the Town of Foleyet's effluent discharge on the riverine ecosystem, and all downstream water bodies, when allowed to sit in the headpond for up to 48 hours.

d) **Identified Potential Effects**

Xeneca listed numerous potential effects from pp-98-100 of the ER.

- i. It was very interesting to note Xeneca's assumption in the ER – p-146, that "The majority of the identified adverse effects were determined to be ***not significant***", meaning that they are not likely to cause unacceptable harm to environmental quality, productive capacity of the effected environment, or the socio-economic and cultural attributes of the area;
- ii. Further to this point, Xeneca only marked three adverse environmental effects, "*determined through professional judgement to have significance*". ORA submits that Xeneca's judgement of whether an issue is "significant" is biased; and
- iii. In Table 5, p-136 of the ER,– Impacts to tourism/outfitters as a result of impacts to fisheries and public access – Xeneca's rating for the local, regional and provincial economies was "*not significant*". Local outfitters would disagree.

- Note:** (1) ORA submits that Xeneca's professional judgement is biased, as this company has everything to lose by finding significant risks, and consequently, independent and unbiased studies must be undertaken to ensure the significance or non-significance of all the potential negative effects listed in the ER.

- e) **Ivanhoe Lake Dam** is located approximately 40 km upstream from The Chute, and is yet another blockage to upstream fish passage.
- f) **Third Falls hydro-electric facility** would be located 43km downstream, and is proposed to have an inundation area that would reach to the downstream side of The Chute; and Xeneca admits in its report "*there may be cumulative effects associated with intermittent operation and inundations*".
- g) **Climate Change** and other weather related effects in ER p127 – Xeneca mentions the changes predicted were a doubling in the number of extreme rain events, but conveniently forgot to mention an expectation of extreme drought conditions as well.
- h) **Variable Flow and Rapid Flow Changes** present obvious problems with turbulence, sedimentation, erosion, and drying of shoreline.

- i) **Erosion and Sedimentation** are a major concern with any peaking operation.
- j) **Clearing for new Transmission Lines and Access Road/s** creates corridors for run-off of rain-water and snow melt, and brings more sedimentation and debris into the ecosystem.

## 2. Contempt of Process

- a) **Site Release & Applicant of Record:**

MNR and MOE representatives both made clear recommendations in writing to Xeneca, on several occasions, to wait until the Site Release process was completed before formally commencing with the Waterpower Class EA process. MNR and MOE tried to follow their policy and procedure, and their legal obligation to the public, by protesting Xeneca commencing the EA process; however, Xeneca pressed on in spite of their warnings.

  - i. Xeneca was awarded a FIT Contract on April 29, 2010, and immediately commenced the EA process with field studies that Spring and Summer, before any approval had been granted by MNR or MOE.
  - ii. Site Release and Applicant of Record have not been awarded to this day.
  - iii. It is mentioned time and again in Appendix C that Xeneca's timelines are tight and they must meet the deadlines.
  - iv. Appendix C, P-65, September 20, 2010, a letter was sent from C. Hayward, Director of Southern Region, on behalf of her Northern Region colleagues, stating MNR would participate in Xeneca's Class EA process, however, still recommended a Site Release be awarded before commencing.
  - v. So MNR in Southern Region decided to set aside their policy, procedures, and their regulations, and give reluctant compliance, but only after Xeneca had already begun their field studies.
  - vi. Appendix C of both this ER and also for the Serpent River ER are peppered with attempts by Agency staff to follow regulations, policy and process, and the proponent either ignored their instructions, requests and concerns, or circumvented them by placing pressure on upper levels of Ministry management to make staff cooperate. In Appendix C, P 91, of the Serpent River EA, there was a very revealing letter from Patrick Gillette to Richard Linley, MNR, dated 27 May 2011, wherein he states, *"The Wider "Ask" is staffs are asked to stop using policy to try to stop or delay projects and to work toward reasonable and positive solutions. This shifts the focus away from Xeneca spending money on addressing "ghost" issues (e.g., after two years of study we do not find certain species, but the MNR insists they are there with no proof and pushes for more study – this is the lochness monster affect) or using policy and process in a inappropriate way that is bordering on abuse of process. Instead, if we work together these resources could be used to produce positive environmental affects and better data collection for the benefit of*

*the province; e.g. funding the stocking of trout lakes.” This letter must have worked because there was a definite shift in power. From that point on Xeneca was telling agency staff what they would and would not do.*

- Note:**
- 1) Xeneca or any other developer should not be given preferential treatment, or even expect it.
  - 2) Xeneca’s timelines should not take precedence over policy, procedure, provincial regulations, and most of all the health and well-being of the community, the environment, and the riverine ecosystem.
  - 3) MNR and MOE staff must be left to focus on what they trained long and hard to do, and that is to protect our natural resources and environment. Staff must not be placed in a position of having to appease a developer whose main focus is on profit, and not on protecting the environment and natural resources.
  - 4) By placing these types of pressure tactics on Ministry staff, we must question the integrity and merit of any decisions made on all waterpower proposals going through the approvals process to date. The threat of losing one’s livelihood can be a powerful motivation to tow the line in spite of the costs to the environment and natural resources.

b) **Field Studies Ongoing:**

The MOE and MNR expressed concerns with respect to the timing of completion of the EA since studies and investigations were ongoing, and wouldn’t be completed before the Environmental Report (ER) was submitted, and would not be addressed in the document; and thus there would remain a requirement for public consultation to present the findings of these post EA investigations.

**Note:** ORA submits that Xeneca must complete all studies before their ER is approved. Stakeholders and authorities cannot make an informed decision when vital facts are not known.

c) **Project Description:**

At the May 30, 2011 meeting between MNR and Xeneca, p-107, it was noted that, *“Generally, the Project Description for the Chutes was insufficient to conduct a thorough review and provide substantive, specific comments to Xeneca. Little detail was provided on the construction, operation, transmission routes, or zone of influence of the facility.”* Xeneca was asked to prepare an addendum to the PD to include updates, but they deemed it unnecessary.

d) **Public Consultation:**

- i. Xeneca frequently repeats the mantra, *“this is a proponent led process”*, and conducts itself in a very cavalier manner. The proponent typically provides the public with very little information and at the very last minute has dumped volumes of technical documents into the public domain – knowing full well that
  - Most stakeholders are lay people, and are on a very steep learning curve; and
  - Have no access to funding for environmental consultants and/or

- lawyers.
- ii. MNR recommended that Xeneca hold PICS in Foleyet and Timmins, and yet Xeneca decided to hold only one meeting, on July 7, in Chapleau – with no meeting in Timmins. A June 17, 2011 memo from Enskaitis to Sheila Derasp, Local Services Board of Foleyet, stated, *“The PIC will take place on July 7, 2011 in Chapleau (location requested by the Ministry of Natural Resources).”* I found no documentation from government agencies recommending the meeting be held in Chapleau instead of Timmins and Foleyet.
  - iii. Appendix C – p-249 – April 19, 2011 – Minutes of EA Coordination Meeting – Public Consultation: *“MNR has concerns regarding the degree and method of public consultation up until this point. Public Information Centres have been held in Foleyet, yet none in Timmins and Chapleau where many people that use the river reside. Open house material was lacking. Public information boards offered very little detail with respect to site design and/or the proposed water management regime. Very little, if any information was posted with respect to other permit and approvals that are required (e.g. Requirements for WMP and amendments). MNR has been receiving several letters of concern from the public and some are claiming that Xeneca is not responding to them.”*
  - iv. Xeneca’s Environmental Report is lacking many field studies and final conclusions. How can stakeholders and authorities make an informed decision or draw any conclusions when so much information is lacking?
  - v. So many categories in Table 4 of the ER, under “Residual Effect” indicate “Unknown due to outstanding data and information”. In Table 5 – Residual Environmental Effects and Significance – the answer to the majority of the items is *“Not Significant”*. Again, it should not be Xeneca deciding whether these effects are significant or not – it is to their advantage to say *“Not Significant”*. Leaving these vitally important assessments up to a proponent is like putting the fox in charge of the henhouse.

**Note:** ORA submits:

- 1) Xeneca must be instructed to revisit all potential residual effects, and hire an independent consultant to conduct studies to confirm these important determinations;
- 2) There must be an open, transparent and cooperative EA and approvals process;
- 3) In order to maintain the integrity of the EA and approvals process, MNR and MOE staff must be allowed to carry out their roles of protecting our natural resources and environment without manipulating pressures from upper management, and developers with self-serving interests;
- 4) MNR and MOE must take control of the EA and Approvals process again, as the integrity of the process is placed into question when the Proponent can decide how, when and if important information will or will

not be included in the Project Description, Environmental Reports and supporting documentation for approvals; and

- 5) Public Meetings -
- Be held in a forum format where public participation is open, accommodating, fully informative, and everyone can hear all the questions and answers; and
  - Xeneca/proponents provide displays with site specific design and engineered drawings, as well as details of the water management regime.

### 3. Mitigation

ER, Table 4, 10th page – Fish Migration. *"Upstream fish passage through the eastern channel is highly dependent on water levels and velocities and is only possible under certain flow conditions."* Peaking creates unnatural fluctuations in river level and flow velocity and could affect both migration and spawning.

- a) Xeneca has not indicated whether it will provide
- an increased environmental flow during spawning runs; and
  - Fish ladders or resting areas for safe upstream and downstream passage, as is mandatory per the 1977 LRIA guidelines.

Xeneca is proposing a Gross Head of 9.5m, which is an impossible barrier for upstream and downstream fish passage; however, these mitigation steps would help preserve fish diversity and numbers. Hydro-electric generating stations will earn proponents several millions of dollars over the life of the 40 year contract, so must responsibly provide this type of effective mitigation.

- b) The Ivanhoe River is known to have Lake Sturgeon, and the ORA has recently heard from a local fisherman who reported that he caught a 47" Lake Sturgeon near the base of The Chute 4 years ago, as well as another two people who caught two Lake Sturgeon while angling from shore, only three years ago; however, Xeneca has only just begun their Sturgeon studies this summer, so have not had time to determine their presence.
- c) It is well known that turbines chop up fish, and today there are low head and fish friendly turbine designs to choose from, with a 100% survival rate.

**Note:** This proposal must include:

- 1) Fish ladders and/or resting areas for safe upstream and downstream passage;
- 2) A long-term study to establish the presence, numbers, seasonal movement, and possible spawning areas of Lake Sturgeon;
- 3) Fish friendly turbines; and
- 4) a portage area for canoers.

### 4. Public Safety

Xeneca states in B-Annex I, p-14, 3.3 Public Safety & Civil Structures, *"Public*

*consideration could arise due to variability in flows and the rate of change in flow levels in the Variable Flow Reach. Possibly affected could be recreational users who are camping, fishing or hiking at the edge of the river in this location (Xeneca left out canoers or anyone that might be swimming or wading)..... It should be recognized that intermittent operation would only occur during low flows, most of which occur during the winter months when the river is frozen and recreational uses are limited."*

- a) The Ivanhoe River is a recognized canoe route which provides passage to James Bay.
- b) Xeneca conveniently disregards the summer months here, and yet the Hydrograph shows the lowest water levels during the summer months. So, what else is Xeneca leaving out?
- c) As indicated by local stakeholders in the creel survey, ice fishing and snowmobiling are common in the area.

- Note:**
- 1) ORA requests that Xeneca undertake further studies and incorporate effective safety measures into their operating protocol to ensure public safety, both above and below the dam.
  - 2) Xeneca must consider global warming and poorer ice conditions above and below the dam, and provide mitigation to protect local stakeholders?

## 5. Decommissioning of Dam

ORA is requesting that Xeneca place funds in escrow for dam decommissioning, so that if for some reason the generating station is no longer viable and must be removed, the funds will be there to take care of it. There is a very good likelihood this could happen due to climate change, the possibility of a withdrawal of the FIT program, or perhaps major damage to the dam caused from ice and/or flooding.

## 6. Modified Run-of-River

Xeneca has been referring to these proposals as "*modified run-of-river*", and interprets this to mean water in equals water out.

- a) ORA submits that if normal water flow is held back and left sitting in the head pond, by their own report for up to 48 hours, then this would be an interruption in flow, which is not simply water in equals water out. The water quality would be changed, and would certainly be diminished or degraded after sitting for 48 hours – 2 days of sun and heat.
- b) Xeneca refers to the headpond as "small", but small is a very relative term – this headpond would be 6.4 km in length, with an inundation area of 59 hectares (146 acres) in all.

**Note:** MNR and MOE must develop standardized definitions and terms, and decide whether the label "*modified run-of-river*" can be used to describe these types of proposals throughout Ontario. ORA submits that the term "*modified run-of-river*" should not be used to describe these types of proposals that hold water back, because it gives the public a very false impression of a benign and

unobstructed intrusion into the river flow, when it is obviously not. These types of dams use peaking technology and should be referred to as **Peaking Dams** – not run-of-river or modified run-of-river.

## 7. Installed Capacity – Power Generated

Xeneca states - EA, 3.3.1 – Installed Capacity and Annual Energy Output, *“The approximate installed capacity of this project will be 3.6 MW, generated by one turbine unit. This will provide approximately 13,300 MWh of renewable energy annually.”*

- a) ORA submits that 3.6 MW is the nameplate capacity (IC) and could only be generated if the turbine ran at full power 24-7, which will only happen throughout the Spring freshet. This is misleading to the public. Given typical river flow conditions Xeneca would be lucky to generate at 54% of IC, or 1.94 MW on average, and at times will actually have to shut the plant down due to insufficient river flow.
- b) In fact small waterpower projects like The Chute can only produce full power during the freshet period when excess hydro power is available from existing large hydro generating facilities. These larger plants would have to spill water to allow the unneeded output of small waterpower projects like The Chute to be absorbed, since the FIT obliges IESO to take this power and pay premium rates for it.

**Note:** ORA is requesting that Xeneca use standardized references showing installed capacity as well as expected average power generation in all Notices and Reports for all dam proposals in Ontario.

## 8. Socio-Economic

On ER p-146, Xeneca states *“the majority of the identified adverse effects were determined to be ‘not significant’, meaning that they are not likely to cause unacceptable harm to environmental quality, productive capacity of the effected environment, or the socio-economic and cultural attributes of the area”.*

**Note:** 1) The ORA requests an Economic Impact Study be undertaken by Xeneca to determine the cost of the proposed dam project to the outfitters, lodges and other tourist industries in the area, based on the cumulative effects, to establish how this proposal might affect those who rely on the Ivanhoe River for their living; and to quantify, in detail, any economic benefits to the local community arising from construction and operation of the plant.

## 9. The Chute and Third Falls

- a. Under the Ontario Class Environmental Assessment Act, O. Reg. 116/01, s1(3) it states, *“two or more generation facilities that function together as an integrated system for generating electricity shall be deemed to be a single generation facility for the purpose of this regulation.”*

- b. On ER P-137 of the ER Xeneca noted, *“If built, Third Falls GS would create an inundation area that would reach to the downstream side of The Chute. The Third Falls project would create a backwater effect that would prevent the downstream reach from draining during intermittent operation..... There are a number of associated cumulative impacts to consider with the construction and operation of two new waterpower projects on the same waterway, and they are presented in section 7.2.”*
- c. Xeneca also noted, *“in order to manage the activities, a communications protocol between the operators of the Ivanhoe Lake Dam and the Xeneca facilities (The Chute GS and Third Falls GS) will be implemented.”*

**Note:** ORA requests that The Chute, Third Falls proposals, and the Ivanhoe Lake dam, be addressed under one Environmental Assessment, as these three dams would be operated as one unit, and would have a very significant negative cumulative impact on the Ivanhoe River, Groundhog River, and all downstream riverine ecosystems.

### **Recommendation:**

The CEAA, 4.(2) states, *“In the administration of this Act, the Government of Canada, the Minister, the Agency and all bodies to the provisions of this Act, including federal authorities and responsible authorities, shall exercise their powers in a manner that protects the environment and human health and applies the precautionary principle.”*

### ORA submits

1. MNR and MOE staff have not been given the freedom to use their authority or expertise in a manner that protects the environment and human health;
2. Xeneca has managed to skip and jump ahead of important protocol and process to expedite their application, against the protests and recommendations of Agency staff;
3. The experience of the ORA and the public (ref. 2(d)(iii), in our dealings with Xeneca, has been one of frustration and aggravation at the lack of transparency, openness and cooperation. This is unacceptable, and not in the spirit and intent of the public consultation process set out in the Waterpower Class Environmental Assessment. It is evident that Ministry staff also experienced challenges with Xeneca’s lack of cooperation and compliance;
4. The Chute GS Environmental Assessment Report is incomplete in numerous areas as there are still many studies which need to be started, and completed, before any approvals should be granted;
5. The cumulative effects of all facilities, water management practices, obstructions, roads, transmission lines, diversions, as well as all resulting *“Identified Potential Risks”*, must be considered with a precautionary approach in order to protect the well-being of all communities, the environment, and the riverine ecosystem; and to comply with the EAA and the CEAA;
6. Safe fish passage, both upstream and downstream, must be an integral part of

- all hydroelectric dam proposals, as set out in the LRIA, 1977 guidelines, and there is no mention of this mitigation measure in this ER;
7. Public Safety measures are also absent in this Environmental Report, and this is not acceptable; and
  8. For the many reasons listed in the ER and in the body of this letter, this type of “*modified run-of-river*” hydro-electric dam is very harmful to a riverine ecosystem, both upstream and downstream; and when you have “*two or more generation facilities that function together as an integrated system for generating electricity shall be deemed to be a single generation facility for the purpose of this regulation*”, the negative cumulative effects are amplified. In order to meet the intent and spirit of the Canadian Environmental Assessment Act and section 1(3) of the Class Environmental Assessment Act, O. Reg. 116/01, ORA requests that Xeneca be ordered to meet their legal obligations under this legislation, and address The Chute and Third falls under one Environmental Assessment Report.

As demonstrated above, The Chute ER is very lacking in several extremely important areas, and the cumulative effects of this proposal would have a devastating effect on the Ivanhoe River’s entire riverine ecosystem, as well as those bodies of water below it. It is the position of the ORA that hydro-electric generation, in the form Xeneca is suggesting at The Chute, will have unacceptable environmental impacts, and does not contribute in any way to “*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*” (EAA, R.S.O. 1990, c, E.18).

These types of proposals must not be fast tracked, or pressures placed on Agency staff to bypass or ignore important policy, process and mitigation measures – the integrity of the entire process is put into question by these actions.

Consequently, ORA, after having carefully reviewed the Class Environmental Report and supporting documentation for the Proposed Ivanhoe River Generating Station, The Chute, is requesting a Part II Order be issued to elevate this proposal to an Individual Environmental Assessment.

ORA looks forward to your response.

Sincerely,



Linda Heron  
Chair, Ontario Rivers Alliance  
[OntarioRiversAlliance.ca](http://OntarioRiversAlliance.ca)  
[LindaH@OntarioRiversAlliance.ca](mailto:LindaH@OntarioRiversAlliance.ca)

Cc: Vanesa Enskaitis, Xeneca - [venskaitis@xeneca.com](mailto:venskaitis@xeneca.com)

Patrick Gillette, Xeneca – [Pgillette@xeneca.com](mailto:Pgillette@xeneca.com)  
Mark Holmes, Xeneca – [Mholmes@xeneca.com](mailto:Mholmes@xeneca.com)  
The Honourable Linda Jeffrey, MNR - [ljeffrey.mpp.co@liberal.ola.org](mailto:ljeffrey.mpp.co@liberal.ola.org)  
Gord Miller, ECO – [Commissioner@eco.on.ca](mailto:Commissioner@eco.on.ca)  
Theresa McClennaghan, CELA – [Theresa@cela.ca](mailto:Theresa@cela.ca)  
Amy Liu, CEAA – [Amy.Liu@ceaa-acee.gc.ca](mailto:Amy.Liu@ceaa-acee.gc.ca)  
Dave Bell, CEAA – [Dave.Bell@ceaa-acee.gc.ca](mailto:Dave.Bell@ceaa-acee.gc.ca)  
Laurie Brownlee, MOE - [Laurie.Brownlee@ontario.ca](mailto:Laurie.Brownlee@ontario.ca)  
Ellen Cramm, MOE – [Ellen.Cramm@ontario.ca](mailto:Ellen.Cramm@ontario.ca)  
Alan Rowlinson, DFO – [Alan.Rowlinson@dfo-mpo.gc.ca](mailto:Alan.Rowlinson@dfo-mpo.gc.ca)  
Jennifer Thomas, DFO – [Jennifer.Thomas@dfo-mpo.gc.ca](mailto:Jennifer.Thomas@dfo-mpo.gc.ca)  
Carl Jorgenson, DFO – [Carl.Jorgenson@dfo-mpo.gc.ca](mailto:Carl.Jorgenson@dfo-mpo.gc.ca)  
Jennifer Hughes, TC – [Jennifer.Hughes@tc.gc.ca](mailto:Jennifer.Hughes@tc.gc.ca)  
Rob Dobos, EC – [Rob.Dobos@ec.gc.ca](mailto:Rob.Dobos@ec.gc.ca)  
Michael Shaw, EC – [Michael.Shaw@ec.gc.ca](mailto:Michael.Shaw@ec.gc.ca)  
Sheryl Lusk, EC – [Sheryl.Lusk@ec.gc.ca](mailto:Sheryl.Lusk@ec.gc.ca)  
Paul Bernier, MNR – [Paul.Bernier@ontario.ca](mailto:Paul.Bernier@ontario.ca)  
Tim Mutter, MNR – [Tim.Mutter@ontario.ca](mailto:Tim.Mutter@ontario.ca)  
Ed Snucins, MNR – [Ed.Snucins@ontario.ca](mailto:Ed.Snucins@ontario.ca)  
Donna Cansfield, MNR – [Donna.Cansfield@ontario.ca](mailto:Donna.Cansfield@ontario.ca)  
Mike Bernier, MNR – [Mike.Bernier@ontario.ca](mailto:Mike.Bernier@ontario.ca)  
Sarah Vascotto, MNR – [Sarah.Vascotto@ontario.ca](mailto:Sarah.Vascotto@ontario.ca)  
Bruce Richard, MNR – [Bruce.Richard@ontario.ca](mailto:Bruce.Richard@ontario.ca)  
Janet Ronne, City of Timmons – [Janet.Ronne@city.timmons.on.ca](mailto:Janet.Ronne@city.timmons.on.ca)  
Sheila Derasp, Foleyet Local Services Board – [sect@onlink.net](mailto:sect@onlink.net)  
Jason Batisse, Wabun Tribal Council – [j.batisse@wabun.on.ca](mailto:j.batisse@wabun.on.ca)  
Taykwa Tagamou First Nation – [jml\\_prevost@hotmail.com](mailto:jml_prevost@hotmail.com)  
John Yakabuski, PC MPP – [John.yakabusko@pc.ola.org](mailto:John.yakabusko@pc.ola.org)  
France Gelinis, NDP, MPP - [fgelinis-co@ndp.on.ca](mailto:fgelinis-co@ndp.on.ca)  
Andrea Horwath, NDP, MPP - [ahorwath-co@ndp.on.ca](mailto:ahorwath-co@ndp.on.ca)  
Rick Bartolucci, Liberal, MPP - [rbartolucci.mpp.co@liberal.ola.org](mailto:rbartolucci.mpp.co@liberal.ola.org)