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Ontario Power Authority

Email: FITsubmissions@powerauthority.on.ca

Dear Sirs:

Re: FIT Program Review – Draft FIT 3

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-OV, Council of Canadians, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Mississippi Riverwatchers, French River Stewardship, as well as many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

ORA is writing to express our concern that waterpower <500 kW would continue to receive FIT Contracts under Draft FIT 3. Waterpower, with its serious, well documented and long-lasting negative impacts should not be considered part of any renewable energy mix or be included within the Green Energy Act and FIT Program. Hydroelectric results in dirty energy, and there are numerous studies and reports, as well as a long history of dam impacts to back this statement up.

The first decline of Ontario streams was largely due to the mill dams that caused the extinction of Lake Ontario Salmon, and doubtless many other lesser migratory populations that weren't so well documented; and twentieth century hydro dams have devastated many other species such as the American Eel and Lake Sturgeon. Ontario has an extensive history of hydroelectric dam development, where the damage inflicted by dams has led to the extirpation and/or extinction of many aquatic species.

The numerous problems with hydroelectric have not gone away, and these new operating strategies devised to take advantage of peak demand bonuses have only served to increase the potential for negative impacts to our water quantity, water quality, and our fisheries. Many of the dams that have been proposed on smaller rivers are only feasible because of the lucrative bonuses paid to produce power during peak demand hours. These types of bonuses only encourage developers to maximize power generation at the expense of the riverine ecosystem.

Hydro has a high environmental price to pay, is costly to develop, provides unreliable power generation, poses a significant risk to our fisheries and endangered species, and places public health and safety at significant risk.

Ontario must not pursue any further expansion of hydroelectric while we have a surplus of power. Existing hydro facilities should be upgraded, efficiencies made, and environmental mitigation measures employed (fish passage and improved environmental flows) before any new hydro development is contracted.

*"We live in an era of increasing pressures on freshwater resources due to population pressures, industry demands, and climate change. In such times our governments should recognize their duty to manage these resources as common resources for the benefit of the public, now and in the future."*¹

ORA requests that all mention of waterpower development be removed from the Green Energy Act and FIT Program.

Thank you for this opportunity to comment.

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance

Cc: The Honourable Bob Chiarelli, Minister of Energy - minister.mah@ontario.ca

¹ Ecojustice