

March 22, 2011

Ms. Jennifer Predie
Senior Habitat Biologist
Northern Ontario District, Ontario-Great Lakes Area, Central & Arctic Region
Fisheries and Oceans Canada
Government of Canada
28 Waubeek Street
Parry Sound, ON P2A 1B9
Telephone: 705 746-2196 253
E-mail: Jennifer.Predie@dfo-mpo.gc.ca

Dear Ms. Predie:

Re: Proposed Bala Falls Hydro-electric Generating Station and Fish Habitat

It has recently come to our attention that despite years of claiming the proposed Bala Falls hydro-electric generating station would operate as “run-of-river”, in fact its operation would be cycled off and on daily during at least lower-flow periods, such as every four to eight hours.

This daily and unpredictable change in water flow at the proposed fish habitat areas is not described in the letter of intent submitted by the proponent to your office, dated November 30, 2010. For example, the proponent’s letter notes their proposed shoals would be “subject to relatively constant hydraulic conditions” – which would not always be true.

Cycling the flow every few hours, from completely off, to some larger flow would have many negative effects, none of which were addressed in the letter of intent. For example:

- What would the effect be on the benthic habitat and benthic invertebrate production.
- How would this affect fish mortality through entrainment, as the flow at the intake would change every few hours.
- The upstream water level would change frequently, what would the resulting effect be on shoreline habitats.

In addition, we are concerned that both the proponent’s environmental screening report and their letter of intent do not cite studies which include such frequent cycling of flow. Addressing these concerns requires science-based facts, not conjecture.

We are also concerned that the public has not been informed of this change of operation, as this affects public safety and other concerns they may have.

We look forward to receiving updated information on the habitat changes as a result of this new information.

Sincerely,



Mitchell Shnier, on behalf of SaveTheBalaFalls

cc: A. Sanzo, Ministry of the Environment, Environmental Assessment and Approvals
Branch