

## Bala Falls Update

Here are some of the issues which remain unaddressed by the proponent for the proposed hydro-electric generating station at the Bala Falls (and this, more than a year after all such environmental impacts were to be addressed by the proponent's environmental screening report which they issued in October 2009).

1) Noise

The proponent's noise calculations only include 2 of the 5 noise sources (and assumed that the structure would have 8"-thick concrete walls when in fact there would be many 3' x 4' openings). And yet, these calculations have been accepted by the Ministry of the Environment without any explanation or response to our request to discuss these.

2) Vibration

The proponent claims there would not be any vibration, yet standing on the public look-out of the Fenelon Falls power station (which is a much smaller station than that proposed) shows that not only does the vibration feel that one is standing on a humming factory, the drone of the large machinery below drowns out the sound of the falls.

3) Economic Impact Study

The proponent was required to complete an economic impact study, and they concluded the proposed generating station "...will not negatively impact local business activity" and yet the authors did not talk to tourists, and did not ask local business what negative impacts they expect. That is, the conclusions are completely unsubstantiated, and yet so far the Ministry of the environment has accepted this study.

4) Cycling Operation

While the environmental screening report – and all public statements from the proponent even to this day – state that the proposed generating station would be run-of-river, the MoE has recently informed the public the proposed station would actually use a cycled operation (in which the turbine would be stopped and started every day) – at least for the summer.

- This is a major change, which was being negotiated between the proponent and Ontario Power Generation for a year, yet the proponent has still not told the public about this.
- There are public safety, wildlife habitat (such as fish entrainment and mortality), and many other serious implications which have not been addressed.
- For example, industry practice requires that sirens and strobe lights be used to warn the public of such remotely-operated stations being started. This would be of interest to the many nearby residences (and sound travels far over water), yet we have no information on the intensity, duration, or frequency of operation of such devices.
- Fisheries and Oceans Canada has informed us that they are considering whether this new proposed operating regime should trigger a federal environmental assessment.

This is a fundamental change to the proposed operation and has so many negative effects that it should be required that the proponent re-issue their environmental screening report.

5) Scenic Flow

Over 94% of the water would go through the proposed generating station, leaving the Bala falls to be a trickle equivalent to one bathtub per second. People won't go to Bala to see where the falls used to be.

The flow distribution committee (which was selected and approved by the proponent) was not allowed to complete their work, and the proponent told the Ministry of the Environment to ignore what they did do.

And the proponent claims the noise from the proposed station would be masked by the falls – but they neglect to note that the falls would be just a trickle so they would no longer be able to mask anything.

6) Appearance

Being a 120'-long concrete structure in direct view of the most common vantage point for the Bala Falls, the appearance of the proposed structure is important. Yet, the renderings provided by the proponent are rife with inconsistencies:

- The view down-river from the public lookout would be obstructed by a 5'-high 25'-wide hoist mechanism.
- Huge ventilation fans would be required to cool the machinery in the proposed station, and these are shown to be located to blow hot air on people walking to the water. Bizarrely, other drawings from the proponent show these required fans to be covered-over by rocks and landscaping – showing the proponent has not thought through the required cooling or the landscaping. That is, the renderings provided by the proponent are just hopeful speculation, rather than anything to be believed.

7) Publically-accessible Land

As part of this process, the proponent would have control – for 40 years – of Margaret Burgess Park (the green space north of the north falls) and Diver's Point (adjacent to the south dam). The proponent should provide assurance that these lands would remain freely accessible by the public and that the proponent would never apply to alter these or to build any structures on them.

Being crown land, municipal zoning restrictions may not apply, perhaps the proponent will try to build high-rise condominiums on these lands, yet when we suggest this the proponent only says they would need to separately apply for such permission (this does not provide any comfort).

8) Publically-accessible Shoreline

The proposed project would make over 500' of the only publically-accessible shoreline at the Bala Falls too dangerous for access. People come to Bala to see the falls and get to the water, this would no longer be possible.

9) Safety Boom

The upstream safety boom uses a known dangerous design, yet Transport Canada has accepted this and will not respond to questions.

10) In-water Recreation

Transport Canada's mandate and expertise is marine navigation, yet their approval is being used for in-water recreation such as swimming, scuba diving and the 100-year-old annual Bala Regatta which includes fun activities just upstream which involve children and tipping canoes. Other organizations, such as The Royal Life Saving Society Canada, have such in-water recreation safety expertise, but have not been asked for input.

11) Completion Bond

The proponent is a company with no operations, no employees, no assets, and has never built a generating station before. They would need to raise money for the construction of the proposed project. If they ran into technical problems, cost overruns, a business dispute – or if they damaged the highway bridge or the Bala north dam (they would be blasting directly adjacent to these) – they could just walk away from the project, leaving hundreds of feet of rocks (the temporary coffer dam required during construction) piled in the Moon River and North Channel, or a 60'-deep trench blasted across the highway. And the public would need to pay to restore the site (witness the mess in Port Carling). Now would be the time to inform the proponent that they would need to post a completion bond, yet they refuse to do this.

Or what if the Bala north dam was damaged and failed – Lake Muskoka is 20' higher than the Moon River. The resulting flood into the Moon River and rapid drop in water level of Lake Muskoka could not be stopped. Yet the proponent has not completed a risk assessment, agreed to insure for such an accident, or otherwise even acknowledge this issue.

12) Communication with Proponent

We have tried to have our concerns addressed, but the proponent continues avoid actually answering the public's questions, they just repeat their evasive responses.

13) Alternatives

We have tried to work with the proponent to arrive at a more benign solution, but the proponent will not make any changes to address how the area is used by the public.

14) Cultural Heritage Landscape

The proponent's own heritage impact study concluded the area is a cultural heritage landscape. Yet the proponent has misinterpreted the Ministry of Tourism and Culture's letter that the area has no archaeological artifacts as authorization that the project would have no heritage impact.

15) Wastewater

The proposed station would require a washroom and would have an oil sump and an oil-water separator, yet has no provision to handle the resulting wastewater.

These are just some of the outstanding issues. Much more detail is available at [SaveTheBalaFalls.com](http://SaveTheBalaFalls.com), or by e-mailing [info@SaveTheBalaFalls.com](mailto:info@SaveTheBalaFalls.com)