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## Re: Aquatic Safety Audit Report for the Bala North Falls

For many years the community has had public safety concerns for the proposed hydro-electric generating station at the Bala Falls.

Despite our many requests that this issue be studied by a competent authority, the proponent has not provided this. We therefore commissioned an Aquatic Safety Audit by the Royal Life Saving Society Canada, and their report is attached.

- 1) The Lifesaving Society is Canada's lifeguarding expert and provides programs, products and services to prevent drowning. They establish swimming qualifications and set standards for lifeguarding, and they also provide safety assessments; for example of indoor water parks and outdoor beaches. The lead individual who investigated and authored the attached report also authors reports for legal Counsel, is involved with Coroner's Inquests into drownings, and testifies as an expert witness in Court. That is, this work was done by an independent third-party, is authoritative, and was written by an experienced expert.

As part of this work, the report's author visited hydro-electric generating stations in the area, and at the time was also working on safety assessments commissioned by the Town of Gravenhurst for their public beaches. So he understands the context of both the area and hydro-electric generating stations.

- 2) Some significant quotes from the attached Aquatic Safety Audit report for the Bala North Falls are as follows (emphasis added):
  - a) *"The proposed installation of a **hydroelectric generating station adjacent the Bala North Falls dam would create extreme new dangers**, to both upstream and downstream in-water recreation."*
  - b) *"We present our recommendations below, and suggest plans to implement these be presented to government agencies, stakeholders, and the public as part of the design stage for this proposed generating station, **and before any construction begins**. This would ensure that these **plans could actually be implemented in practice, and allow for any required changes to be incorporated in the station's design**."*
  - c) *"The proposed hydroelectric generating station in Bala would be closer **to in-water recreational activities than any other station** we are familiar with, yet there do not appear to be any plans to deal with the extremely dangerous situation this may create."*

d) ***"In whole, this development would create an unusually and extremely dangerous situation, and therefore requires a commensurate level of planning to be presented to agencies, stakeholders, and the public. This process should be started and completed before any construction proceeds, to both ensure it would be practical to implement, and so that any required changes could be incorporated into the design of the proposed station."***

3) We note that:

a) In 2008, a 16 year old boy drowned while attempting to swim through the tailrace discharge of the Wilson's Falls generating station. The proposed Bala generating station would have **more than ten times** that tailrace discharge flow.

- So the proposed Bala station would be even more dangerous.

The Wilson's Falls generating station is operated by Bracebridge Generation, and is a few km north of Bracebridge, on the north branch of the Muskoka River.

b) It is extremely rare for people to be swimming near the Wilson's Falls generating station (most don't even know it is there or how to get to it).

However, in-water recreation at the Bala falls, both directly upstream of the proposed station's intake and directly adjacent to and downstream of the proposed station's tailrace is very popular.

- This further increases the public safety concern for the proposed Bala station.

c) The MNR:

- Acknowledges this existing swimming and boating in Bala, for example, in their Public Safety Measures Plan for the Bala Falls Dams, the final report is dated March 2011.

- Observed the current situation in this Public Safety Measures Plan that the flow through the Bala dams is;
  - Mostly through the south dam.
  - Rarely changed in the summer and when it is, operators are present to first warn those in the water.

d) The proponent:

- Also acknowledges the existing swimming and boating in Bala, for example in their 2009 Environmental Screening/Review report.

- States in both their 2009 Environmental Screening/Review report and 2012 Addendum that after construction of their proposed generating station, swimming and boating could safely continue outside of their upstream and downstream safety booms.

- Has not addressed that the flow through their proposed generating station;
  - Would bring the fast water hundreds of feet closer to the in-water recreational area at the base of the Bala north falls.
  - Would be greater than is now, due to the cycling mode of operation.

- Has therefore not shown how their proposed station could be operated safely.

e) Visiting 32 nearby and similarly-sized hydro-electric generating stations (photographs posted at <http://savethebalafalls.com/?p=6852>) shows that **none** have public or private docks as close as the proposed Bala station would have, and also **none** have in-water recreation as close.

- The proposed Bala generating station would create an unusually dangerous situation, yet the proponent has no plans to address this.
- f) Rather than providing a plan to deal with this “extreme danger”, the proponent:
- Has stated they would **not provide any warning** to the public before the proposed station would begin its daily operation at about noon on summer days.
  - Has **changed their plans (increasing minimum and cycling flows) so this operation would be even more dangerous** than initially stated.

That is;

- The MNR accepts that there is and will continue to be swimming at the base of the Bala falls.
- The proposed Bala station would be large enough to be deadly and would make the known in-water recreational areas extremely dangerous.
- Visiting 32 nearby generating stations shows that none have in-water recreation as close as it would be in Bala.
- Rather than proposing a plan to deal with this, the proponent has made their plans even more dangerous.

## Summary

- The expert input is that before any construction is allowed to commence, the proponent for the proposed hydro-electric generating station at the Bala falls must be required to provide plans showing both how their proposed generating station could be operated safely and that it would be practical to implement these plans.
- The proponent’s current plans are unacceptably dangerous.

Therefore, the proponent’s current proposal must be stopped until they can show the public that it could be operated safely.

We also note that we were only able to learn of the proponent’s 50% increase in planned cycling flow through submitting a Freedom of Information request. Such information about public safety should be part of a public consultation process, but has cost many thousands of dollars and for this request, required waiting eight months to receive it. This is unacceptable.

Sincerely,



Mitchell Shnier