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Re: Swift River Energy – Proposed Bala Falls Project

Who am I? Our family recreational property has 180' of waterfront that looks directly at the intake of the proposed plant about 500' away across open water. I have enjoyed many weeks of summer residence there for all but two or three of my 79 years. I count myself the fourth generation Dempster who has summered at this location beginning in the 1880s, making our grandchildren the sixth generation. My wife and I have spent heavily in money and effort maintaining and improving the original 1894 cottage headquarters of the original Big B Camp, since we acquired the property in 1985. I know the location and history of the area near the proposed power plant extremely well.

Has the case been made for the appropriateness of the proposed plant? From my standpoint as a Harvard University professor of statistics for 50 years, I find the information so far presented by the Swift River Energy sketchy and obviously self-serving. The lack of transparency makes it impossible for an impartial observer to judge the merits, or to fairly balance costs versus benefits.

Requirement for approval. Documents available on-line assert that proposals for the use of Crown lands must:

“Integrate consideration of the Environmental Bill of Rights with social, economic and scientific considerations when making decisions that might significantly affect the environment.”

[“Section 3.4 Guidelines” for “Waterpower Site Release and Development Review, PL 4.10.05, compiled by Lands and Waters (Renewable Energy) revised May 21, 2007” regarding approval by the Ontario Ministry of the Environment]

Re social considerations:

- The proposed plant is out-of-scale, bisecting as it does a historic village of a few hundred permanent residents whose central feature is the scenic beauty afforded by its waterfalls. Think about what the outcry would be if a large power plant were proposed for the island between the falls at Niagara, capable of using a maximal fraction of the flow to generate electrical power. Is the Bala Falls project not simply trading on the tiny size of the Bala situation to run roughshod over the local opposition? Is the disruption and ill will worth it for a minuscule contribution to the overall provincial picture?

- Disruptions from construction and subsequent operation will greatly affect currents on the Lake Muskoka side. The feel-good material from Swift River Energy argues that the North Dam boom will need only be moved a short distance toward the railroad bridge, but in fact the wide intake will produce dangerous currents when summer flows that now go over the South Dam are redirected to the power plant, making boating and swimming very dangerous, where kids now jump in the water and boats approach the town dock.
- On the Moon River side, Swift River Energy makes much of the minor viewing platform they will construct. There is no problem with viewing anyway, but they are silent on their own above ground industrial building, and their access and parking areas on the small space west of Road 169 that are likely to affect traffic on the main road.

Re *scientific* considerations:

- Swift River Energy discusses maintenance of Lake Muskoka water levels. It goes without saying that, they must be maintained within current ranges. Where is the evidence that the plant will be engineered in such a way as to control levels both above and below the dam? How is coordination to be managed with the upstream and downstream authorities? Who is in control? Many more details please.
- Where are the data on available total water-flows, as they vary during the year, and as they vary from year to year, depending on variation in area rainfall? What are the corresponding data on how much power can be generated, given restraints on safety and disruption of scenic features? I do not find public quantitative analyses of these scientific issues, which impinge on the social and economic issues.
- The company asserts that they looked into the feasibility of building below the South Dam. This location has much less scenic value than the North Falls, especially since the highway was rerouted decades ago. It is the location primarily used to maintain water levels for much of the year. A plant tucked under the railroad bridge would not need to tear up the highway and disfigure the small Burgess Island location of the present plan, and would have access from the already large and ugly current parking area off Road 169. At first sight, much less rock cutting and removal would be involved. It is typical of the arrogant attitude of Swift River that they simply state that they looked into this and found it infeasible. Where are the engineering studies that fairly analyze pro and con in comparison with their preferred plan (including weighing of *social* and *economic* issues)?

Re *economic* issues:

- There are many issues here, none of which are addressed. Who gains and who loses? Are the Ontario consumers and taxpayers protected? Is it fair to expect local businesses to suffer both short and long term losses in search of the mantra of clean and renewable energy?

- What is the Swift River business plan? Where is the investment coming from? Who will profit if the project goes forward and succeeds economically? Is there a hidden subsidy in the form of power price guarantees or guarantees to the company against losses?
- Are there in fact detailed quantitative analyses available for public inspection of proposed costs both of construction and of subsequent operation and maintenance. Where is the risk analysis, under various favorable and unfavorable scenarios? Who is bearing the risks?
- What guarantees will be in place to prevent the various contractors who will build and those who will operate the proposed plant from simply ignoring the promises they now make so freely? Is a trustworthy system of governmental overview, reporting and regulation going to be in place. The incentives from the standpoint of builders and operators will be to cut corners, especially by using more and more of the flow to generate power and therefore money. Who are the watchdogs who will protect the local community, not to mention broader communities of consumers and taxpayers? This needs to be nailed down before approvals are granted, since afterward it will be too late.

In summary, there are numerous arguments pointing against any small hydro power project in Bala that need serious consideration. Certainly, there needs to be much more evidence of competent weighting of issues, and much more intelligent debate before any approvals are granted.

Arthur Dempster