



The Architectural
Conservancy
of Ontario
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Preserving heritage
since 1933

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December 20, 2010

Mr. Adam Sanzo
Project Evaluator, Environmental Assessment and Approvals Branch
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5

Adam.Sanzo@ontario.ca

Dear Mr. Sanzo:

Re: Proposed Bala Falls Hydroelectric Power Plant – Anticipated Negative Environmental Impacts

The Architectural Conservancy of Ontario was incorporated in 1933 to help communities save buildings and structures of architectural merit and places of natural beauty or interest. We have reviewed the proposal to build a hydroelectric power plant at Bala Falls and worry that it will seriously impinge on this place of natural beauty or interest.

We note that the guidelines for environmental assessment requirements for electricity projects includes the following paragraph:

In the Environmental Screening Process, the definition of "environment" is the same as that in the Environmental Assessment Act. "Environment" in the EAA is broadly defined to include air, land and water as well as natural, cultural, social and economic components.

The Glossary defines "negative environmental effects" as including:

"cultural or heritage resources. Negative environmental effects may also include the displacement, impairment, conflict or interference with existing land uses, approved land use plans, businesses or economic enterprises, recreational uses or activities, cultural pursuits, social conditions or economic structure."

The Provincial Guidelines on the Man-Made Heritage Component of Environmental Assessments defines Cultural Heritage Landscapes:

Cultural landscapes in the countryside are viewed in or adjacent to natural undisturbed landscapes, or waterscapes, and include such land uses as agriculture, mining, forestry, recreation, and transportation.

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A cultural feature is defined as the following:

...an individual part of a cultural landscape that may be focused upon as part of a broader scene, or viewed independently. The term refers to any man-made or modified object in or on the land or underwater, such as buildings of various types, street furniture, engineering works, plantings and landscaping, archaeological sites, or a collection of such objects seen as a group because of close physical or social relationships.

There is no question that the Bala Falls meet the definition of a Cultural Heritage Landscape, and under the terms of the Guidelines on the Man-Made Heritage Component of Environmental Assessments, there appears to be no question that a full environmental assessment is required for the site before proceeding.

We therefore request that the proposal be elevated to full environmental assessment so that the Provincial Guidelines be complied with.

Regards,

A handwritten signature in black ink, appearing to read "Lloyd Alter". The signature is fluid and cursive, with a period at the end.

Lloyd Alter B.Arch OAA
President, Architectural Conservancy of Ontario

cc: The Honourable Michael Chan, Minister of Tourism & Culture