

June 10, 2011

The Honourable Kathleen Wynne, MPP
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Dear Ms. Wynne:

Re: Proposed Bala Falls Hydro-electric Generating Station

Summary

Through a process begun by the Ministry of Natural Resources in 2004, there is a proposal to build a hydro-electric generating station at the Bala Falls.

The environmental assessment process has been on-going for over a year and while this is said to be based on facts and science, we have documented many issues which have not been properly addressed.

Detail

- 1) The only first step in the process to either have the negative impacts of the proposed project examined in more detail, or to have the proposed project cancelled, is to have it elevated to require an individual environmental assessment.
 - a) In the ten years the current legislation has been in place, a total of 80 electricity projects have been proposed.
 - b) Of these, the public requested that 50 of these require an individual environmental assessment.
 - c) The Ministry of the Environment has denied **all** 50 of these elevation requests.
- 2) The Minister of the Environment prides himself, and the Ministry of the Environment, for making their required complex decisions based on science. Yet:
 - a) The noise calculations only included 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 justification.
 - b) The economic impact study concluded "*...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. The Bala Falls and access to the water are fundamental to Bala's and the surrounding area's economy and tourism.
 - c) 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 it 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 has public safety, wildlife habitat,

and many other serious implications which has so far been justified with only a completely unscientific, informal, and unsubstantiated letter. The proponent should be required to re-issue their environmental screening report, along with providing a public comment period so the many impacts can be adequately addressed (we have submitted to the MoE 8 pages of concerns about this one issue).

- 3) Over 94% of the water would go through the proposed power 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.
- 4) 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:
 - a) The view from the public lookout would be obstructed by a 5'-high 25'-wide hoist mechanism.
 - b) Huge ventilation fans would blow hot air on people walking to the water (and the required fans are shown blocked by backfill).
- 5) The proposed project would make over 500' of the only publically-accessible shoreline at the Bala Falls too dangerous for access.
- 6) The upstream safety boom uses a known dangerous design, yet Transport Canada has accepted this and will not respond to questions.
- 7) 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.
- 8) We have tried to have our concerns addressed, but the proponent continues to repeat their evasive responses.
- 9) We have tried to work with the proponent to arrive at a more benign solution, but the proponent will not make any changes.

Finally, the proponent's environmental screening report did not consider the cumulative effects of the proposed project, and did not show that the proposed project would result in *"the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment"*, as required by the Environmental Assessment Act. We look forward to working with the Ministry of the Environment and seeing this assessment process being handled in a fulsome manner.

Sincerely,



Mitchell Shnier