

## Part II Order Request

### Enerdu GS Expansion and Redevelopment Project

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#### Name and Address of the Requestor

Mississippi RiverWatchers  
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#### Name of the Project and Proponent

Enerdu GS Expansion and Redevelopment Project  
Enerdu Power Systems Inc.  
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OE8982-00

#### Environmental Report Prepared by

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#### ***Project Synopsis: Enerdu GS Expansion and Redevelopment Project***

Enerdu Power Systems Inc. is proposing expansion of its existing hydroelectric facility, the Enerdu Generation Plant, located at 11 Main Street, on the Mississippi River in the Town of Almonte, Ontario, in the north-eastern part of the Mississippi River watershed. The proposed project involves construction of a new powerhouse, construction of a new Obermeyer weir on approximately the same footprint as an existing weir/dam, excavation of the river bottom at and below the proposed new powerhouse, and at, above and below the existing weir/dam location with the stated goal of increasing the present generation capacity of 300 kW to 950 KW, and decommissioning and dismantling of the current generating station.

## Part II Order Request

This document and the attached response from the Mississippi RiverWatchers group (the “supporting material”) to the Enerdu GS Expansion ER comprise an official request for a Part II Order for an Individual Environmental Assessment of the Enerdu GS Project from the Mississippi RiverWatchers Group.

### **Specific Reasons for the Part II Order Request**

A number of Environmental concerns have not been addressed in the ER. We have attached a copy of our detailed response to the Environmental Report which raises many major concerns by local residents and our group. We have summarized some of our concerns below and referenced them to the supporting document.

#### **1. Zone of Influence**

The “zone of influence” for the project has been deliberately misrepresented to allow the proponent to avoid addressing most of the serious impacts of the project. Plans to restrict compensation flow will impact well outside the 250 meter range down the river and cover an area identified as a fish spawning and hatchery habitat. The falls downstream at the former Rosamond Mill, would effectively be dried up during the summer and early fall season except when the plant is generating power, yet no mention is made in the ER. (In the proponent’s ER, Appendix A, at Page 13 they state they may not be able to maintain the minimum compensation flow (1 CMS) during periods of low flow of the river.)

All of Reach 18 on the Mississippi River is already directly and negatively impacted for a distance of approximately 9 kilometers. The impact of the project on this area has been brought to the proponent’s attention by local residents, the Ministry of Natural Resources, Mississippi Valley Field Naturalists, the Ottawa Riverkeepers, the Mississippi Valley Conservation Authority, and our group, the Mississippi RiverWatchers, yet the proponent refuses to acknowledge this impact zone.

⇒ See Section 3 in the supporting material.

#### **2. Run-of-River/Hydro Operations Impacts**

The proponent claims this to be a Run-of-River operation, yet the disruption of the natural flow of the river is significant. The proponent has introduced peaking, the practice of holding and releasing water based on time of day hydro rates, a departure from the run-of-river regime which the proponent claims to be their operating process. The environmental impact of significantly increasing the ability hold (with an Obermeyer Weir) and release (approximately three times the amount of water from their current water taking permit) will not only increase the range of peaking, but also the speed at which the water levels will change on Reach 18. This has not been addressed in the ER.

⇒ See section 3, particularly 3.2, 3.4, 3.6, 3.7, and 3.9 in the supporting material.

#### **3. Excavation / Dredging**

The proponent is proposing to blast, hoe ram and / or dredge the solid rock river bottom at and below the proposed new powerhouse, and above and below the existing weir

structure. It is our understanding that significant modification of the river bottom to change the flow of the river is completely inconsistent with the Run-of-River concept.

⇒ See sections 3.2, 4.2.9, 4.4.2 and 4.5.4 in the supporting material.

#### **4. Cultural Impacts**

The cultural impacts of this project are massive. This is not a project in a rural area. The proposed project is located in the centre of a beautiful historic community, adjacent to local residences, parks, a scenic community riverwalk, and very close to the main street of the community. While the proponent is trying to portray this project as simply an upgrade to an existing facility, they are in fact proposing a large (in proportion to the location and existing facility) new structure in the middle of the river and community. Almonte is a tourism centre with little industry. We rely on our ability to attract tourists in order to maintain our community viability. The cultural impacts of this proposed project has not been addressed in the ER and the proponent has not responded to local residents' concerns about this issue.

⇒ See sections 2.3.4 to 2.3.6 and sections 4.1.2, 4.1.2, & 4.1.3 in the supporting material.

#### **5. Adjacent Landowner Concerns**

The issue of the impacts on the shoreline has been brought up by adjacent landowners. These are landowners adjacent to the existing weir and generating station and landowners whose riverfront is adjacent to the proposed blasting/hoe ramming sites. Directly across the river is a residential condominium development which owns two small dams which the proponent has included in his plans, yet the proponent has had held no negotiations concerning the use or upgrades of these dams. No Riparian land owners have been contacted about these issues despite numerous requests by the landowners.

The ER does not address demonstrated erosion problems adjacent to the proposed excavation areas, impacts on river and shoreline areas adjacent to the condominium development, and the impacts on the changes in flow on downstream properties. Based on the ER, there will be significant impact in these areas.

⇒ See sections 4.1.5 and 4.1.7 in the supporting material.

#### **6. Reach 18**

The section of the Mississippi River known as Reach 18 in the Mississippi River Water Management Plan is directly above the proponent's existing weir structure. During periods of low flow the Enerdu Generating station can raise or lower the water in the 9 Km section of Reach 18 by as much as 1 metre. The proposed new project will allow the proponent to have a much more significant impact on this section of the river. The Appleton Wetlands, a provincially significant wetland and identified as ANSI, has experienced major damage due to the operation of the current facility. This problem was identified to the MVCA and MNR prior to the commencement of this project. This impact was not addressed in the ER.

⇒ See section 3 in the supporting material.

## 7. Noise Impacts

The proponent is proposing a new powerhouse building (approximately 140 feet long, 60 feet wide and 32 feet high) taking up about 26 % of the current river width (on an area identified as crown land and not currently or in the past, occupied by any structure) yet they want to avoid designation of the powerhouse as a new industrial building. There are a number of residences directly adjacent to this proposed building, those owned by the proponent are as close as 7 meters while others are closer than 50 metres. MOE noise regulations alone should stop the construction of a new industrial structure of this type (24 hours a day power generation).

⇒ See section 4.2 in the supporting material.

## **Discussions and Resolution of Concerns**

Repeated efforts by individuals and community organizations to discuss their concerns about this project have been minimized by the proponent. These groups and individuals were told that their concerns would be addressed in the ER. Please note that MOE and MNR have been copied on many of these letters. All letters from the Mississippi RiverWatchers were sent by registered mail to ensure they were received by the proponent.

As of January 27, 2013 the proponent has yet to respond to our concerns or arrange to meet to discuss the points raised in our objections in the attached document.

⇒ See section 5 in the supporting material.

## **Why a Part II Order is Required**

This project is clearly not covered by a Class EA Assessment. The zone of impact has been demonstrated to be well beyond that envisioned for a Class EA. A Part II Order will ensure that the environmental impacts of this project are fully understood and that necessary remedial steps are carried out by the proponent to mitigate the negative impacts of the project.

## **Other Matters**

As a hydro redevelopment project in the middle of a community, decisions by MOE for this project will likely set precedents for this type of development in future projects located in river communities across Ontario. The Ministry needs to ensure that they do not set precedents which will be used by other developers and which could adversely impact these communities.

A full and detailed study of this project will help ensure that the Ministry of the Environment can provide future developments with clear and appropriate guidelines.

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If we can be of any further assistance, please contact us at the email address on the first page.

Bryn Matthews, Chairperson

The Mississippi RiverWatchers