

William A. Allen
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Vanesa Enskaitis
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Dear Ms. Enskaitis,

Re: Ivanhoe River – The Chute

INTRODUCTION:

Further to my letter of August 12, 2011 to you please note that I write as a private citizen of Ontario, one of the citizens with whom Xeneca has made a “binding commitment” through the Class Environmental Assessment process. (Ref: The Chute Environmental Report [ER] Foreword, unnumbered page F4). I write in open format to share with others who may be interested.

Thanks for your communication of August 15, 2011:

- acknowledging Xeneca's receipt of mine of August 12,
- your notice that you have added my contact details to the Stakeholder Contact List for the Ivanhoe River projects
- your further notice that you have sent my questions to the appropriate staff and consultants and
- your notice that Xeneca will get back to me in a timely fashion.

Since Aug. 15 I have received no further communication from Xeneca or representatives of Xeneca. As a result Xeneca has not followed through in a timely fashion with me as promised. Nor does your website provide answers to my questions. I continue to not be satisfied with The Chute proposal or the evaluation process and now am not satisfied with Xeneca's lack of communication with me.

Since Aug. 12 I have made a personal visit to various parts of the Ivanhoe River Watershed including The Chute and Third Falls (as well as Second and First Falls) and their respective proposed inundation zones. I found information that is not available in any of the documentation that Xeneca has shared with the public. Nothing during those visits reduces the concerns that I raised in my August 12 letter to you. In addition to the points which I raised on August 12 please note the following points.

ALLEN Additional CONCERNS AND QUESTIONS as of September 4, 2011 (Lettering of issues carries on from the lettering in my Aug. 12 letter to you):

G. Xeneca Failure to Respond to My Questions

After holding my questions of August 12 for over three weeks Xeneca has failed to answer a solitary one of my questions of to notify me what it considers a timely response. The delay of Xeneca's response is unhelpful in resolving issues raised as required by the process.

G-1: Will Xeneca respond to all of my August 12 and September 4 questions by September 8, 2011?

H. Registered Archaeological Site at The Chute

Please note that there are many very large cedars and some culturally modified cedars in both The Chute and Third Falls environs. Some of the very large cedars on the mainland at The Chute are in an area which Xeneca has determined needs to be cleared to make way for a large staging area and turnaround for trucks as well as access to a proposed new boat landing further downstream from the existing one. Such cutting of rare mature old growth cedars is unacceptable. Two culturally modified cedars are on the island at The Chute very close to proposed structures which would render these trees vulnerable. My data for one such culturally modified tree has been accepted by the Ministry of Tourism and Culture which has assigned Borden Number DcHo-01 under my archaeology licence. I am in the process of documenting a second culturally modified cedar which I observed at the upstream end of the island at The Chute directly in the location of part of the proposed spillway dam.

H-1: Based on this heads up to you will Xeneca contact the Ministry of Tourism and Culture to determine what implications the DcHo-01 site registration and my report about the second culturally modified cedar have for your proposed development at The Chute and let me know what changes Xeneca will implement in its proposal as a result?

I. Ivanhoe River as a Significant Cultural Heritage Landscape

Far, far more cultural heritage information is available about the Ivanhoe River than is contained in any documents which Xeneca has provided to the public yet. To name a few, the history includes:

- the archaeological site registrations upstream from The Chute at Ivanhoe Lake including the work of William Finlayson
- the history of disruption to First Nations people at Piskanagama
- the flood episodes from dam bursts in 1918 and 1960 including the reasons for the dams breaking
- the history of the relationship between the Ivanhoe River and the provincially significant esker which extends through several townships including Oates Township
- the history of erosion at Ivanhoe River Provincial Park with its attendant history of major silting backup behind the dam at the outlet to Ivanhoe Lake. There also is much knowledge available re the meaning of Piskanagama and its significance for all dams on the Ivanhoe River.

Xeneca is abandoning the precautionary principle by proceeding with its proposal at The Chute without documenting such history or analyzing the implications of that history for The Chute proposal.

I-1: Will Xeneca undertake a study of the topics noted above and release the results of that study to the public before proceeding with its proposal at The Chute?

J. Silting and related Cumulative Effect of Silting at More Than One Dam on the Ivanhoe River

Because of the fine soil composition of the esker in the region the Ivanhoe River's natural flow regime is disrupted by any dam. The silting behind the dam at the Ivanhoe Lake outlet is continuing to pose more and more of a problem which is going to require a very expensive mitigation before too many years. Any additional dam placed on the Ivanhoe River risks development of silting at a much higher rate than happens in the average dam. If The Chute dam were in place it is just a matter of time before the owners of the dam will have their own very expensive mitigation problem to solve re silting. The projected speed of long term silting has not been studied by Xeneca. Nor has the contribution of additional sources of silting from proposed new river banks in the proposed inundation area upstream from the dam. Nor has the proximity of Sand Lake where the Ivanhoe River crosses the esker. The cumulative silting effect of having more than one dam on the Ivanhoe River needs thorough scientific study and, since addressing Cumulative Effects is a Statement of Environmental Values for MNR, the study must include the nature of silting mitigation that will be required and the impact of that mitigation on the environment as well as anticipated costs of such mitigation over the length of the expected life on the proposed Chute Dam. In ignoring this large looming problem Xeneca again is not honouring the precautionary principle.

J-1: Will Xeneca arrange for a study conducted by scientists with specific expertise in silting problems and mitigation using careful mathematical calculations to identify potential long term silting impacts and to weigh the importance of those impacts and the costs of mitigating them?

K. Full Impacts of The Chute Proposal Are Unknown

I see a general problem of Xeneca not actually having the necessary background completed before its Notice of Completion was posted. The posting was premature. I saw a patch of rare calypso orchids during my walkabout. Cold water fisheries data is sparse. I see implications for The Chute because Third Falls is proposed inappropriately within Northern Claybelt Forest Complex Conservation Reserve (C1702). Xeneca's, a conservation reserve which is protected under provincial legislation. Xeneca's archaeological reports have not identified known archaeological potential in parts of the proposed transmission route that are in the immediate vicinity of known trapper trails and a vintage trapper's cabin.

K-1: Will Xeneca voluntarily withdraw all of its plans for hydroelectric generation at The Chute?

K-2: If Xeneca will not voluntarily withdraw its proposal for The Chute will it voluntarily agree to an elevation to an Individual Environmental Assessment at The Chute?

Thanks for reviewing these matters. I look forward to your responses.

William A. Allen