

Table 1: Minor Amendments for the OWA’s Class Environmental Assessment for Waterpower Projects

Item	Section & Page Reference ¹	Original Text	OWA Proposed Revision	OWA Rationale	MOECC Response ²	MOECC Rationale
1.	1.3 Purpose of the Class EA p.12	Adhering to this Class EA will facilitate meeting the core planning requirements for this array of approvals.	Remove	This wording has caused confusion regarding the expectations of Class EA planning process. Section 1.3 discusses how detailed engineering and design information is only available after the Class EA planning process is complete. However, the sentence gives an indication that all requirements for approvals must be met during the course of the Class EA planning process, which is incorrect.	Instead of remove wording as proposed, replace existing wording with: “Section 4.1.2 provides more guidance on coordinating the Class EA with other approvals processes.”	Coordinating the Class EA with other approvals is an important and desirable function of the Class EA. Rather than removing the wording as proposed, this should instead guide readers to the section that provides more guidance.
2.	Add a new section: <i>2.5.7 Interests of Water Management Infrastructure and Waterpower Facility Owners</i> p.22	n/a	2.5.7 Interests of Water Management Infrastructure and Waterpower Facility Owners For projects on managed river systems there is the potential for a project associated with existing infrastructure or a new project to impact the operation of existing infrastructure. In these circumstances it is the responsibility of the	Clarifies the course of action for coordinating existing facilities and new development in the context of water management	Accept with revised wording: For projects on managed river systems there is the potential for a project associated with existing infrastructure or a new project to impact the operation of existing infrastructure. In these circumstances it is the responsibility of the proponent to identify and assess the effects of their projects on the	Agree that this new section adds additional guidance on potential impacts with existing infrastructure. However, the last sentence in the OWA proposed text may not fully capture all necessary considerations beyond dam operating and/or water management plans. The revision is intended to generalize the new

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			proponent to coordinate their operations with the existing owners. This may necessitate an amendment to dam operating and/or water management plans through the <i>Lakes and Rivers Improvement Act</i> .		existing facilities and propose appropriate mitigation measures.	section in order to encourage the consideration of all relevant effects and stakeholders.
3.	4.2.1 Notice of Commencement p.33	Additional notification methods may also be employed at the proponent's discretion. The OWA will post all Notices of Commencement on its website.	Additional notification methods may also be employed at the proponent's discretion. Where an internet site is employed as an additional notification technique, proponents are encouraged to submit the web address (URL) to the OWA for posting on the OWA website and/or to embed it within their notice of commencement. The OWA will post all Notices of Commencement on its website.	In response to a recommendation from the Ontario Rivers Alliance (ORA), the OWA will encourage proponents to provide a linkage to a project website, if one exists.	Accept as proposed.	Agree with amendment as it encourages improved stakeholder notification through a project proponent's website where one exists.

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4.	6.2.1 Public Consultation Principles p.60	<p>Transparency</p> <ul style="list-style-type: none"> ○ sufficient information for meaningful and constructive participation and consideration of values ○ how participation informs the outcome of and the final decisions for the project <p>Trust</p> <ul style="list-style-type: none"> ○ that all have a vested interest in ensuring the sustainable development and use of Ontario's waterpower resources 	<p>Transparency</p> <ul style="list-style-type: none"> ○ information will be provided to allow for meaningful and constructive participation and consideration of values ○ participation in the EA process will inform the outcome of and the final decisions of the project <p>Replace first bullet with:</p> <ul style="list-style-type: none"> ○ that all involved will contribute to the sustainable development and use of Ontario's waterpower resources 	In response to a recommendation from the ORA, the OWA is proposing to add more clarity to wording in the Class EA around the principles of Transparency and Trust.	Accept as proposed.	Agree with amendment as it is a minor change to clarify wording.
5.	7.1 Aboriginal Interests p.64	Proponents are expected to involve Aboriginal communities who may be directly affected by, or have an interest in, the development of a waterpower project and to develop an engagement approach specific to these interests. When considering which Aboriginal communities to contact, proponents	Proponents are expected to involve Aboriginal communities who may be directly affected by, or have an interest in, the development of a waterpower project and to develop an engagement approach specific to these interests. When considering which Aboriginal communities to contact, proponents	Clarifies which Aboriginal communities are to be engaged for projects on Provincial Crown Land	Accept with revised wording: “For projects on provincial Crown land, the Aboriginal communities to be engaged through the EA will be those identified by the provincial Crown through a coordinated process. In such instances, this list will often have been	The revised wording is more reflective of the processes involved in Aboriginal community identification.

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		should be mindful that the traditional territories, treaty areas, or areas of claims involving Aboriginal or treaty rights of some Aboriginal communities are extensive.	should be mindful that the traditional territories, treaty areas, or areas of claims involving Aboriginal or treaty rights of some Aboriginal communities are extensive. For projects on provincial Crown land, the Aboriginal communities to be engaged through the EA process will be those identified in the Crown land site release process.		developed through the MNRF Crown land site access process.”	
6.	Appendix A p.78-83	n/a – new definitions	<p>Run-of-river - A facility that attempts to use only the ambient flow in the river, as it is available, for generation by passing inflow to maintain an elevation within defined limits, resulting in facility outflow to relatively match reservoir inflow.</p> <p>Cycling/Peaking - A facility that has the ability to store water, then pass water typically at the high efficiency point of the turbine(s) to account for low flow periods. Cycled facilities effectively set a lower level target to reduce</p>	In response to a recommendation from the ORA, the OWA is proposing to include terms that describe the various types of waterpower operating regimes and has developed a series of terms that will enhance clarity and consistency for the public. These definitions are the result of extensive consultation with environmental practitioners and waterpower operators to accurately define the types of waterpower facilities and describe their operating parameters. While	<p>In consultation with OWA, MOECC and MNRF, the proposed definitions for run-of-river and kinetic will be replaced with definitions for run-of-river, modified run-of-river and kinetic as follows. These revised definitions are taken from the <i>OWA Community Guide to Waterpower Development, 2010</i>.</p> <p>No change is proposed to cycling/peaking.</p> <p>Run-of-River A run-of-river facility uses only the natural flows in the river, as</p>	Agree that the additional definitions may be helpful. The revised definitions seek to address comments received and ensure definitions are clear and understandable to the public.

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			<p>outflows and build the reservoir to a higher level target at which point outflows are increased. In a sequential plant scheme an upstream cycling plant will result in downstream plants cycling and maintaining water levels in the lower reaches.</p> <p>Seasonal Storage - A facility that has the ability to store water over a long period of time (eg. seasonally) to allow for generation during high load periods.</p> <p>Kinetic - A facility that operates without any head involved. Installations are typically placed in the water body and utilize the ambient flows of the river or lake.</p>	<p>technical in nature, the suggested definitions were developed to provide a sufficient level of detail in order to enhance the public's understanding. Building on our submission to MOECC and in response to ORA's January 6 letter the OWA has further simplified these definitions for MOECC's consideration.</p>	<p>they are available, for generation. Therefore, the flow in the river is either passed through the plant, or partially released around the plant if the flow exceeds the capacity of the plant to use all of it.</p> <p>Run-of-River with Modified Peaking Many run-of river plants allow for limited storage of water over the course of the day or days. This allows the plant to produce more electricity during periods of high demand i.e., during the day/work week, and save water during periods of low demand i.e., at night/weekends. This type of plant can provide electricity service to the system, but with limitations imposed by the amount of storage and flexibility available (generally through a headpond).</p> <p>Kinetic Hydro Kinetic water power</p>	

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					systems are an emerging technology in Ontario. Turbines are placed in the river and use only the existing flow to generate electricity – there is no head involved. Kinetic systems produce less energy per unit volume of water and are generally used for small scale projects such as a remote cottage or resort.	
7.	Appendix A p.82	n/a	Sustainable Development - considers the environmental, social, and economic effects of decisions on present and future generations.	In response to a request from the ORA, a definition of sustainable development has been added	Accept with revised definition: Sustainable Development – development that meets the needs of the present without compromising the ability of future generations to meet their own needs. ”	This definition is widely accepted as it is taken from the United Nations <i>Report of the World Commission on Environment and Development: Our Common Future, 1987</i> (Brundtland Report)
8.	Appendix C p.96-97	n/a	Add to Effects on the Environment: Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning Publication NPC-300, 2013 – Ministry of the Environment	New guidance with relevance to waterpower industry (Class 4 Designation)	Accept as proposed.	Agree with proposed amendment as it adds useful reference to MOECC noise guidance material.

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