



**ONTARIO  
RIVERS  
ALLIANCE**

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Re: Marmora Clean Energy Hub Project – Reference Number 84597  
Comments on the Summary of the Initial Project Description

Dear Sirs and Madam:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore riverine ecosystems across the province of Ontario. The ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

The ORA is pleased to comment on the proposed Marmora Clean Energy Hub Project (Project), in which Northland Power Inc., in partnership with Ontario Power Generation, is proposing to construct and operate a new pumped storage hydroelectric generating facility that would produce up to 500 MW of electricity for 100 years. The Project would be constructed in the Municipality of Marmora at the site of the abandoned Marmoraton iron ore open pit mine which would be transformed into the lower reservoir of the facility. The Project would also include an upper reservoir, tunnels and a powerhouse, a water delivery system, an underground transmission line, and a 30 MW ground-mount solar facility that would operate for at least 25 years.

The ORA offers strong support for this closed-loop Project as it is as green, sustainable and environmentally responsible as anything we have commented on to date. We are not aware of any substantive or obvious negative environmental impacts or risks in the operation of this proposed closed-loop pumped storage facility that would be created from a repurposed iron ore mine site. This Open Pit was artificially created and is not connected to any river, lake or natural water body; however, we submit that the following issues must be thoroughly considered and assessed:



1. Dewatering of the open pit must be done in a manner that ensures aquatic life, wildlife, and endangered or species at risk are carefully removed to a safe and suitable ecosystem/s.
2. Ensure there is no sediment remaining in the abandoned mine that could result in greenhouse gas emissions, from the wetting and drying of the mine bed.
3. Ensure public safety in the event of a dam failure of the upper reservoir.
4. Ensuring the project has no negative impact on local wells or streams located in the vicinity of this “Highly Vulnerable Aquifer”.
5. Ensure Indigenous interests are well considered and represented in this Project.

This Project does not seem likely to result in any serious negative impacts to other freshwater bodies, nor methylmercury contamination of fish tissue or greenhouse gas emissions, and it will provide clean backup power during the low-flow periods when small run-of-river hydroelectric facilities are shutting down because of reduced stream flow. Comparing the power output of this peak demand storage Project, and its minimal environmental impacts to the number of rivers it would have taken to generate 400 to 500 MW of power from dozens of small hydropower projects, makes it ORA’s preferred choice over conventional hydroelectric facilities.

In accordance with the Electricity Projects Regulation (O. Reg. 116/01) of the *Environmental Assessment Act*, new projects greater than 200 MW in capacity must undergo an Individual Environmental Assessment (EA). However, the rigour and strength of the EA process in Ontario has been streamlined and gutted to the point that we have very little confidence in its rigour or thoroughness. Therefore, ORA submits that a full Impact Assessment is strongly warranted for this first-in-Canada, closed-loop pumped storage project to be built in Ontario.

Please include the Ontario Rivers Alliance as a stakeholder in this Project. Thank you for this opportunity to comment!

Respectfully,

Linda Heron  
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