



Georgian Bay Association
138 Hopedale Ave.
Toronto, Ontario M4K 3M7

Mr. Stefan Skocylas, Regulatory Lead
Ontario Pumped Storage Project
Impact Assessment Agency of Canada
600-55 York Street
Toronto, Ontario M5J 1R7

April 2, 2026.

Re: Project No. 89803, TC Energy Ontario Pumped Storage Hydropower Project

Dear Mr. Skocylas,

The Georgian Bay Association (GBA) is an umbrella organization for 18 community associations along the east and north shores of Georgian Bay, representing approximately 3,000 families. We have been advocating on behalf of our members for over 100 years and estimate that we reach and influence over 30,000 residents of the Georgian Bay. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

Our association has identified significant risks linked to the proposed facility over the past decade, and has repeatedly sought clarification from TC Energy on how they would be addressed. The responses received do not give us confidence that the proponent has the experience or technical capacity to manage a project of this scale, at a site with inherent geological vulnerabilities and sensitive neighbouring ecosystems. While the proponent (TC Energy) has demonstrated financial benefits to its shareholders, it is not clear that this use of our common resources would bring a net economic benefit to the public.

We strongly urge the Impact Assessment Agency to conduct a full environmental assessment and cost-benefit analysis of the TCE Energy Ontario Pumped Storage Hydropower project. These are badly needed, given the number, variety and enormous scale of this project's potential impacts on the Georgian Bay's seasonal economy and its uniquely valuable aquatic ecosystems.

A detailed explanation of our concerns and recommendations follows.

1. Environmental Concerns

Open Loop Hazards: Turbidity and dispersed contaminants

The proposed open-loop design poses significant hazards to water quality. Specifically, its cycling of water between Georgian Bay and an upper reservoir would increase water turbidity, with effects that could extend as far as Manitoulin Island and Tobermory, dispersing clay sediments containing heavy metals and PFAS that have long been sequestered. TCE's documents note that a closed-loop system was considered, but not why it was rejected.

We are also concerned to note that the project document's sole intake diagram is dimensionless and not to scale. Flow rates would create serious fish entrapment risks, and these should be recognized and addressed.

Absence of Baseline Data

TCE's project report and publicly available information establishes no baseline water quality, sediment, or ecosystem conditions in Georgian Bay. Without pre-construction measurements, contamination from tunnelling or excavation could never be accurately assessed or attributed. Independent baseline measurements, including deep-core sampling for heavy metals and contaminants, should be made before any construction begins.

Disturbing contaminants during construction

The project site is an active DND property with documented contamination risks, including undetonated munitions. DND analysis in 2025 cited contamination and species at risk as reasons not to pursue infrastructure projects here.¹ The region's economy, worth millions of dollars per year, depends on safe, attractive bodies of water that should not be endangered.

Among the contaminants that concern us, PFAS needs special mention. Military bases like the proposed site have been identified as hotspots for PFAS contamination, and it is very likely that the TC Energy pumped storage proposed project would release significant amounts of these compounds. This is disturbing for two reasons. First, there is no safe level of PFAS in drinking water, as reflected in the extremely low recommended limits in Canadian and Ontarian regulations. Second, PFAS are very difficult to remove once water is contaminated; treatment options are limited, expensive, and not always fully effective.

In addition, we are concerned that the only publicly available contaminant sampling with respect to this project comes from well water, which does not reflect contaminant levels in deeper clay sediments. If these layers are disturbed, released contaminants could exceed safe thresholds for fish and human consumption, with consequences for drinking water and public health as well as species at risk and fish species that underpin seasonal tourism.

¹ "Transmit site and preliminary receive site for the Arctic Over-the-Horizon Radar Program in Southern Ontario." Dept of National Defence. December 22, 2025. <https://www.canada.ca/en/department-national-defence/services/operations/allies-partners/norad/aothr.html>

Inadequate engineering specifications

We are concerned to note that the Initial Project Description contains no scaled engineering drawings, no flow rate calculations, and no detailed construction methodology. No construction standards exist for pumped storage facilities of this design, and the proponent has not provided an explanation for their approach to these specifications.

This project would include the excavation of 22-27 million cubic metres of material and a perimeter wall retaining 22 million cubic metres of water; it is far too significant to approve without more detailed disclosures to the public. For comparison, the Niagara Tunnel project at Adam Beck suffered major delays and cost overruns in 2009 because geological conditions were inadequately assessed. The Meaford site would require *two* tunnels with combined excavation that could exceed that project.

2. Cost-Benefit and Liability Concerns

Taxpayer Liability and Process

Our members have significant concerns about the process by which this project is proceeding, and about its potential for creating new burdens for taxpayers:

- TCE was selected without a competitive procurement process.
- The Ontario government committed \$285 million in public funding to the proponent to conduct assessments, an indication of pre-existing political support that raises the question of whether or not the project can be evaluated objectively. This concern is shared by Georgian Bay Forever and the Georgian Bay Land Trust.
- There has been no independent assessment of the project's impacts. In addition, recent provincial and federal legislation have created the potential for both levels of government to bypass the impact assessment process entirely.
- So far as we can determine, TCE assumes no liability for environmental damages associated with the pumped storage facility. However, such damage appears to be entirely likely, and remediation costs should not fall to Canadian taxpayers. Georgian Bay Forever shares this concern.

The government of Canada should insist that any project approvals include stringent environmental remediation clauses.

- There is also no provision for the costs of decommissioning the project. The entire lifecycle of the project must be considered, and to saddle the public with this additional cost will seriously detract from its overall benefit.

Economic Cost/Benefit is Not Clear

It is not at all clear that this project will be a net benefit to the people of Georgian Bay in the short-, medium-, or long term. The structure of the project is such that any financial returns will go to TCE's shareholders, yet the public costs associated with it are significant. Our concern is heightened by the following circumstances:

- The IESO (Independent Electricity System Operator) has rejected this proposal in 2022 and 2024, citing insufficient net economic benefits to ratepayers.
- Project costs have escalated from \$2.3 billion to over \$7 billion, and with independent estimates exceeding \$10 billion.
- The proponent claims the project would eliminate 600,000 tonnes of carbon emissions; however, construction alone is estimated to produce 0.8-1.5 million tonnes of CO₂. This net benefit is achievable only if natural gas plants are curtailed, a commitment that is quite outside the scope of this proposal.
- Seven neighbouring townships have passed resolutions opposing the project.
- The Niagara Escarpment is a globally significant geological feature, recognized by the Province of Ontario as deserving of special conservation status.² The proposed pumped storage facility will damage it irrevocably, and it does not appear, from the TC Energy proposals, that the value of this unique landscape has been taken into consideration.

3. Recommendations

GBA respectfully requests that the IAAC:

1. Require a full federal Impact Assessment under section 16 of the Impact Assessment Act, including a public hearing.
2. Require an independent assessment of economic and ecological impacts before any approvals are granted.
3. Complete comprehensive baseline environmental measurements before breaking ground.
4. Require complete engineering specifications and a detailed construction methodology that accounts for the impact of the project on the surrounding watershed.
5. Require a clear accounting of liability ensuring the proponent, not Canadian taxpayers, would bear the financial risk of environmental damages.

² It is a UNESCO World Biosphere Reserve, protected by Ontario's *Niagara Escarpment Planning and Development Act* which set up the Niagara Escarpment Plan in 1990.

While our members understand and appreciate the need for investment in our provincial generation capacity, it does not seem that this project would be an improvement to the province or the Georgian Bay region.

The TC Energy Ontario Pumped Storage Hydropower Project, as currently proposed, poses unacceptable risks to the residents, communities, and ecosystems of Georgian Bay. We urge the Agency to ensure that the assessment process is thorough, independent, and conducted with the rigour that it requires.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'M. Denning', written in a cursive style.

Meredith Denning

Executive Director, Georgian Bay Association