

[REDACTED]

From: BoardSec
Sent: February 27, 2014 10:06 AM
To: [REDACTED]
Subject: FW: EB-2013-0442 applicaiton wpd Sumac Ridge Incorporated

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From: marion thompson [REDACTED]
Sent: February-26-14 11:01 PM
To: BoardSec
[REDACTED]
Subject: EB-2013-0442 applicaiton wpd Sumac Ridge Incorporated

To: boardsec@ontarioenergyboard.ca

February 26,2014

Re: File Number EB-2013-0442 FOR DETERMINATION OF LOCATION OF DISTRIBUTION FACILITIES WITHIN ROAD ALLOWANCES OWNED BY THE MUNICIPALITY OF KAWARTHA LAKES

Dear Members of the Board:

These comments relate to the application by wpd Sumac Ridge Incorporated for determination of the location of the distribution facilities within the road allowances owned by the Municipality of Kawartha Lakes.

There appears to be a discrepancy in the request in the application for the distribution in which the applicant is proposing a 44kV underground collector line crossing beneath Wild Turkey Road and **an above ground 44kV distribution line along Gray Road** that is to connect to the existing distribution system along Highway 35.

In the disclosure documents from the EBR posting for the Sumac Ridge project between April 11 and May 18, 2013 the proponent states in their answers to the Ministry of the Environment regarding comments and questions from the public about the distribution line on Gray Road the following: *"To clarify, interconnection lines will be buried underground. Early assessments may have included assessment for overhead lines, but the REA application allows for underground lines. The line may come above ground for the connection to the switching station on private property."*

The applicant has indicated to the Ministry of Transportation that there is a wetland and species at risk along Gray Road and made a request to create an alternative access Road to Turbines 1 and 3 through a Highway 7A entrance. The configuration could change if the alternative was in fact approved by the MTO and would indicate this application to be premature.

Gray Road is a narrow unopened dead-end road allowance that is referred to by many including hikers, naturalists and even wpd as a trail. It has been in existence since the early 1800's and is not used by vehicular traffic. The ground water table is at the surface along a long portion of Gray Road.

wpd has just issued a notice of commencement for a Municipal Class B EA for "road improvements" surrounding the project. This is being done without the consent of the City of Kawartha Lakes. The comment period deadline is February 28 ,2014 and could take several months to complete, particularly if any members of the public request a bump up to an EA Part II order .

Wild Turkey Road where the underground cabling is proposed to connect to Turbines 4 and 5, will be constructed between two headwaters that drain into the Fleetwood Nature Reserve. There has not been a hydrogeological water assessment conducted on this area. The Sumac Ridge project is located over an area designated as "High Vulnerability Aquifer" and "significant recharge area". Without a hydrogeological study, it will be impossible to predict the impact underground cabling along with any road alteration will have on the headwaters or the quality and quantity of vulnerable groundwater resources located on the Oak Ridges Moraine.

The Sumac Ridge Project is presently under appeal and could take some time before the results of that appeal will be known. The MOE Director has now recognized an unidentified receptor located closer than 550 metres to Turbine 1. It is not yet known if this turbine is likely to be removed or relocated. Either could possibly result in change in the design of the distribution system.

For all of the above reasons this application seems to be premature and should therefore be deferred or refused at this time.

Respectfully submitted by

Marion Thompson



**c/c Heather Stauble Councillor Ward 16
City of Kawartha Lakes**