



Community Alliance to Save the Petawawa
c/o 195 Shames Rd., Petawawa, ON K8H 2W8
Tel: 613 687 4320

May 29, 2011

Mr. John Yakabuski, MPP,
84 Isabella Street,
Pembroke,
Pembroke ON K8A 5S5.

Dear Mr. Yakabuski:

**RE: Petition Against a Proposed Small Waterpower Development, Big Eddy Site 2KB21,
Petawawa River**

Attached to this letter you will find a petition requesting that the project to build a small waterpower project on the Petawawa River be stopped. Please carry this petition to the Legislature. Some of the earlier copies have been addressed to the Premier, rather than the Legislature, since I was not aware of the detailed addressing requirements at the time, but the content of the petition itself is uniform. I trust this minor deviation will be acceptable.

With respect to the proposed project, it is not a question of not wanting this development “in our back yard”. There are sound ecological and community reasons why this site should not be developed, which I will describe in more detail below. Rather than allowing this unique river to be destroyed, efforts should be made to protect it so that it may be enjoyed by future generations.

First, I will introduce myself and the organisation which I represent. I am a retired AECL engineer. When I first heard about this project, it seemed to me that there were public safety concerns that were not being addressed in the design. However, when I got together with other groups who were interested in the project, it became apparent that there were other aspects of the project that were cause for just as much concern. Many of these concerns are unique to the Big Eddy Site. Accordingly, we formed the Community Alliance to Save the Petawawa, the aims of which are to gain a better understanding of the project, and to make sure that, if any development is allowed to go ahead, it is conducted in an environmentally responsible manner.

The unique features of the Big Eddy site are as follows:

1. A number of species-at-risk fish (SAR) use the Petawawa River as a migratory route to the upper watershed of the Petawawa River which encompasses a large portion of Algonquin Park. Unlike many proposed small waterpower sites, which often contain existing dams or high waterfalls, the present features at the site do not present an insurmountable barrier to fish.
2. The site where the dam will be built is one of the prime urban kayaking locations in North America, and attracts enthusiasts from all over the world.

3. There is a recreational area located just 500 metres downstream which is used extensively by the residents of Petawawa, including the troops of CFB Petawawa and their families, for canoeing, swimming, and picnicking.
4. The proposed development would be located right in the middle of the town of Petawawa.
5. The Petawawa River is the sole remaining significant free-flowing tributary of the Ottawa River in Ontario. Unlike many proposed small waterpower projects, there is no existing dam at this site.
6. The developer of this site is demonstrating contempt for the public consultation component of the applicable Class Environmental Assessment process.

The first five reasons should have been sufficient to stop the site from being released in the first place. However, none of them is listed specifically in the applicable site release procedure, PL 4.10.05, so the Ministry of Natural Resources apparently did not have an option to stop the project at the Site Release stage.

I will now expand on the six issues listed above, and their consequences:

1. Obstacle for SAR Fish

The project will employ a weir to increase the available head by 2 metres. This weir will be located approximately 400 metres upstream of the bridge on the main street in Petawawa. The river from the weir to the powerhouse – a length of some 300 metres - will be essentially dried up for much of the year. The proponent is proposing that the flow in this reach of the river will be 1 cubic metre per second during the summer. This is one fifth of the minimum flow recorded in the river during the last 100 years.

All fish living in the basin of the Petawawa and Barron Rivers have to pass through the proposed site to travel to and from the Ottawa River. The Site Description Package provided with the Applicant of Record letter for this site identified the following Species at Risk in the Petawawa River: lake sturgeon and river herring. This document also stated that there is the potential for American eel to exist in the river. The river also has a healthy muskellunge population, which is an important game fish. As a trained biologist, the Premier of Ontario no doubt knows a lot more about this subject than I do.

As a matter of fact, the Ministry of Natural Resources is in the process of preparing a Recovery Strategy document for lake sturgeon, and one already exists for American eel. A key element in these strategies is the provision of effective fishways to bypass existing dams.

The proponent's proposed solution to permit the species-at-risk fish to pass the weir is to allow them to swim upstream over the weir during the spring freshet. At that time, the flow is typically fierce, and far exceeds a lake sturgeon's swimming abilities, let alone its jumping abilities, which are non-existent. During the rest of the year, as a result of the negligible residual flows, the fish will not get within 300 metres of the weir, let alone be able to jump it. Downstream passage of fish is likewise threatened by the turbine, the particular design of which has a history of causing high fish mortality. The proposed design would therefore introduce yet another insurmountable obstacle in the migration path of these Species at Risk.

The precautionary approach would clearly be to place a moratorium on development of all small waterpower sites where SAR fish are known to exist until the science of fishway design is better understood.

2. Prime Kayaking Location

The segment of the Petawawa River where the proposed development would take place is one of the prime kayaking sites in North America. Sarah Boudens, the Canadian National Champion and Olympic participant, recently sang the praises of this section of the river and voiced her abhorrence of the proposed Big Eddy project in our local newspaper. While the kayaking potential has not yet been fully developed, there is an annual kayaking event, which this year attracted some 450 participants and many more spectators.

The proponent's current proposal would restrict kayaking in the affected reach to a six hour period on Saturdays whenever the river flow exceeded 100 cubic metres per second. In 2010, for example, that would have meant only one Saturday in the entire year. While this is obviously a negotiable matter, it cannot be argued that the location will be able to claim world-class status if the development goes ahead. The attraction of this site is the free-flowing nature of the river. No man-made feature can replace that.

3. Public Safety

As stated in Xeneca's project Description, the weir site will not usually have an attendant, and the turbine will be controlled remotely by computer. If this system fails, the flow downstream of the powerhouse could increase by at least a factor of three in a matter of minutes. An analysis needs to be undertaken whether this size of change is life threatening to recreational users immediately downstream. It appears that swimmers at least will be at risk. If so, then the kind of warning signs, sirens and flashing lights typically used in remote areas to warn of flood conditions will be inadequate. The only credible way to mitigate this safety risk would be to restrict public access to the river in the park area downstream of the powerhouse using high fences. This is unacceptable. The determination of this part of the design needs to be part of the Environmental Assessment, not a design detail which will remain unknown until after construction starts, or perhaps even until after the first victim has drowned.

4. Downtown Location

Anybody looking at the river, whether from the bridge or from the many properties that overlook the "bypassed reach", will see a dried-up ditch, similar to the example of the bypassed reach on the Misema river, shown in the photograph appended to this letter. The project proponent's cynical response to this concern is that "the determination of this effect as positive or negative is subjective". The Class EA process provides no recourse for downstream owners whose property values will tumble as a result of the aesthetic impact if the project is allowed to go ahead.

5. Free-Flowing Tributary

The Petawawa River is the only significant free-flowing tributary on the Ontario side of the Ottawa River. The Dumoine River, on the Quebec side, already enjoys protection. Rather than sacrificing this one remaining river to development for the sake of what, on average, will amount to some 2.3 MW of supply, consideration should be given to offering it some form of protected status to ensure that is there for future generations

6. Proponent Treats Public with Contempt

The particular proponent who has been granted Applicant of Record status on the Big Eddy project is Xeneca Power Development Inc. Since the publication of the Notice of

Commencement in July 2010, this proponent has demonstrated contempt for the Public Consultation component of the Class EA process. Descriptions of the project are non-specific and give every appearance of being intentionally misleading. Attempts to acquire information that is sufficiently detailed for our understanding of what would actually be built are usually ignored. For example, of the 220 specific questions that have been raised by CASP members to date, only 15 have been answered, and only one of these answers was judged satisfactory by the recipient.

Though many have been requested, not a single project document has been provided voluntarily, other than those mandated by the Class Environmental Process.

As stated above, the proponent is proposing a minimum residual flow of 1 cubic metre per second down a 300 metre reach of the river. This information, contained in the proponent's "Operating Flows and Levels" report, has been withheld from the public, but became available through an unofficial channel. Withholding such a key parameter is indicative of the proponent's contemptuous approach to the public. The tiny amount of flow proposed also indicates that the proponent is treating the regulatory agencies with contempt, since they would have to be totally incompetent to accept such a number. In the unlikely event that the regulators were to accept this number, there is no doubt that the proponent would use it, so he is apparently also treating the environment itself with contempt.

The Class EA process itself warns that "A lack of contact in the initial stages can lead to a loss of confidence in the process among the parties that are not informed about the project until significant decisions have been made". Regrettably, this has proven to be the case on this project.

It does not seem to make sense to allow this process to continue if the proponent is demonstrating contempt for the process he is supposed to be leading. This just wastes the time of the regulatory agencies, the public, and indeed the proponent himself. If this project is not stopped, we will raise a Part II Order request on the basis of this contemptuous approach, without waiting for publication of the Notice of Completion.

Mr. Yakabuski, the discussion above merely touches on some of the more egregious aspects of this project. While there is a chance that the Part II Order request process may result in the project becoming the subject of an individual Environmental Assessment, the past track record of such requests has not been good. It is my understanding that, of 50 projects that have been the subject of such requests in the last ten years, not a single Part II Order request has been granted. In the case of Big Eddy, the Class EA process is absorbing a lot of effort, both on the part of the concerned citizens, and of the regulatory agencies.

I urge the Legislature to give this petition serious consideration. If this project is allowed to proceed, not only will it cripple the appeal of a central tourist attraction in a community whose proud motto is "Dynamic by Nature", it will also do irreparable environmental damage to the Petawawa River, its shores and its fauna, and will also have negative repercussions for the Ottawa River and Algonquin Park.

The attached petition indicates that my concerns are shared by a significant proportion of this community.

Yours sincerely

Dr. G. Alan Hepburn, P. Eng.
Community Alliance to Save the Petawawa

cc by email: Mr. Gord Miller, Environmental Commissioner of Ontario
Ms. Cheryl Gallant MP, Renfrew, Nippissing and Pembroke
Mr. Bob Sweet, Mayor of the Town Petawawa
Mr. Trevor Griffin, Manager, MNR Pembroke Office
Ms. Vicki Mitchell, Environmental/EA Coordinator,
Ministry of the Environment, Kingston

Illustration



**The “Bypassed Reach”
Misema River small waterpower project
Engelhart Ontario, November 2010**

**A Petition
Against a Proposed Small Waterpower Development
Big Eddy Site 2KB21
Petawawa River**

**Submitted by
The Community Alliance to Save the Petawawa**

