Patrick Gillette

**Chief Executive Officer** 

Xeneca Power Development Incorporated

Re: Open Letter to Patrick Gillette, CEO, Xeneca Power Development Incorporated

#### Mr. Gillette:

In response to the recent advertisement that you ran in the local community papers, I wish to provide you with my position and concerns. The *Class Environmental Assessment for Waterpower Projects* advises a proponent that public consultation is an important portion of the process, and Xeneca to date has been woefully inadequate in this regard.

## Protection of the Rights of Navigability:

The Petawawa River "Town Section" currently sees more than 1000 paddler trips per year. For the majority of the year, the proposed project will render large sections of that river unnavigable through the reduction of flows and the construction of a river-wide weir. The Project Description makes provides no assurance that navigability will be maintained.

#### The Weir Design

The Project Description currently indicates a riverwide dam or "weir" that is roughly 1.5 metres in height. In addition to the significant obstacle to safe navigation, I am concerned that the recirculation of water typically found behind such installation present a significant risk to human and animal life. Due to the population in the immediate vicinity, I am concerned that this weir presents a real hazard that must be removed or modified.

## Flow Rates and the Impact on Recreational Use:

The Project Description, and previous correspondence with the proponent has made it clear that the Big Eddy hydroelectric project will drastically reduce flows through the "Railroad" Rapid (a.k.a. Trestle; inaccurately referred to as Big Eddy) rendering it unnavigable. Pending operational schedules, while the reduction in flows downstream of the project site may still provide for navigability it will gravely affect the quality of the experience, the safety of the users and the natural environment. Without a clear understanding of the operational schedule and expected flow rates, it is impossible to provide educate ourselves, or our members on the potential impact. In turn, we cannot form an educated opinion on these aspects of the project.

Even if basic navigability is maintained, inadequate or particularly low flows present a significant safety hazard to boats, equipment and paddlers. Flow rates must be maintained to allow not only navigability but safe navigability.

## **Public Consultation:**

Xeneca has made no attempt to allow out public input into the project in any meaningful way. The restrictive Terms of Reference for the much touted Public Stakeholder Advisory Committee have rendered this communication channel useless. There are far too many unanswered questions, both

among the whitewater recreational community, and the citizens of this community. Xeneca has been intentionally silent and ignorant of valid concerns and requests for information.

# **Public Safety:**

The Petawawa River Town Section is located in a populated area, and in addition to use by whitewater paddlers it is common to find both children and adults swimming, fishing in and around the river. The Project Description provides no detail on how the safety of those downstream of the dam and powerhouse will be assured without restricting access. This is particularly relevant due to likelihood of fluctuating water levels and flows on a daily basis.

## **River Access:**

The Project Description provides no assurance that public access to 'affected reach' of the Petawawa River nor will the immediate vicinity of the powerhouse outflow be provided for. This is relevant to access via watercraft, swimmers or pedestrian traffic. Navigable waterways are public resources and access should not be restricted.

I am adamant that this project in no way jeopardize or restrict access to the river corridor, nor upstream or downstream passage.

#### **Natural Environment:**

It is well documented in peer reviewed research that the construction and operation of hydroelectric projects, including "run of the river" projects, affect a river's ecosystem and surrounding habitat. Conclusions are that the abundance of both plant and fish species decline on water courses used to generate electricity and that those declines defy efforts to artificially restore the streams to their former productivity.

The Petawawa River is one of only two remaining undammed tributaries of the Ottawa River and supports a wide range of important plant and animal species, including two notable species at risk: the American Eel and the Lake Sturgeon. Given that the headwaters of the Petawawa River are within the boundaries of Algonquin Park, this river is relatively pristine and blocking access to this vast area of high quality habitat will undoubtedly cause a significant reduction or loss of biological diversity in this freshwater ecosystem.

The tributaries of the Ottawa River provide very important refuge and spawning areas for fish and it is well known that there are valuable spawning areas for Muskellunge in the Petawawa River. Dams and weirs pose a significant threat to migration of species within a river and can threaten the viability of a species if provisions are not made to accommodate both upstream and downstream migration for fish.

## Instream flow conditions

The impacts of dams on instream flow conditions are well published. This project has the potential to drastically alter instream flow conditions (up to an 80% reduction in discharge rate), resulting in a considerably lower discharge rate downstream of the dam during peak hours. Such a significant reduction in water levels can have severe implications for navigation, recreation, stream ecology and the capacity of downstream reaches to assimilate and dilute pollution.

Xeneca has yet to publish any details regarding operational scheduling for the dam and the estimated discharge rate for peak hours and off-peak hours. This information is essential to the assessment of overall impacts of the project, and must be addressed by Xeneca before the project impacts can be adequately assessed.

Please respond to the concerns above, and the questions below with detailed answers, in a timely fashion. We have read the Waterpower Site Strategy document and the Project Description. The following questions still remain, or, are being revisited in light of the promises made in the recent advertisement in the Petawawa Post (Feb 2011).

Please acknowledge receipt of the letter, and advise when I should expect a detailed response. Without detailed and accurate information, it remains difficult to formulate an opinion and understanding of what you are proposing.