July 20, 2006

Part II Order Request *re* Kanata West Development
by the Carp River Coalition

**ATTACHMENT**

1. Preliminaries

1.1 Relevance of the *Drainage Act*

1. We believe that there is ample documentary evidence that the Carp River, from around Hazeldean Road to beyond Carp Village, became a Municipal Drain early in the 20th Century and that there is no evidence that the Drain has been abandoned. We refer not only to newspaper reports of the time, but also to the Decision of Referee G. F. Henderson (5-7 January 1909), the Ontario Court of Appeal Decision of November 22, 1909, and the Decision of the Drainage Court (December 14, 1910). Despite having been made aware of this evidence, the proponents continue to remain in denial about it (see, e.g., Restoration EA, pages 19, 34 and 61).

2. Based on the evidence, we believe that modification of the main channel of the Carp River under a framework other than the *Drainage Act* is unlawful. Our Request is to be seen as without prejudice to any court challenge that may take place at a future date.

1.2 Role of approvals under the *Planning Act*

1. At the core of much of these Environmental Assessments, Plans, Studies and Reports is the assumption that a proposal by City staff to apply a two-zone floodplain policy in the urban reach of the Carp River will be accepted by City Council and, if appealed, will be upheld by the Ontario Municipal Board. (Refer to the Provincial Policy Statements [PPS] under the *Planning Act*, 1997 edition, section 3.1.3 and 2005 edition, sections 3.1.4. and 3.1.6.)

2. Application of a two-zone floodplain policy was recommended in the 2004 Carp River Watershed/Subwatershed Study. This recommendation was added only in the final stage of the development of this Study and as a result was not to any meaningful extent discussed by the Public Advisory Committee for the Study.

3. In the documents now under review there is no direct demonstration that each of the conditions set out in the PPS have been met. No date for a proposal for Council consideration has been set. Nor is there evidence that the MNR Regional Engineer has been involved in the preparation of the documents under review. We note that, in a Decision regarding the new regulations under the *Lakes and Rivers Improvement Act*, posted on June 19, 2006, the Ministry stated:

"The Regional Engineer of the MNR will continue to be involved in decision making regarding potential application of two-zone floodplain management."
(EBR Registry Number: PB06E6012, Response 4.)

(1.2.) 2. We see it as a flaw in the process that the proponents are permitted to proceed, at considerable expense, with preparing these reports and that the public therefore needs to engage with them at considerable effort without certainty that a two-zone floodplain is appropriate in this reach or even without involvement of the responsible agency official. However, given that the Notices of Completion have been posted, the undersigned have no choice but to formulate their objections based on the documents at hand.

2. Kanata West Environmental Assessment Consultation Report

1. The Report has no useful Table of Contents and no continuous pagination. It is difficult to refer to in these comments.

2. When the City, on May 20, 2005, posted a Notice of Completion for the Carp River Watershed/Subwatershed Study, it invited Requests for Part II Orders and such Requests were made by members of the public. Later it was learned that this invitation was in error because this type of Study is not subject to a Part II Order Request. This episode has diminished and coloured the public's confidence in the administration of the environmental assessment and review process.

3. Worse, the substance of those Requests was not acknowledged nor acted upon. This casts doubt on the degree of genuine commitment to take the public's view into account.

4. On May 2, 2006 both the Ministry of Transportation and the Ministry of Natural Resources wrote letters to City staff, stating explicitly that they were not in a position to provide the concurrence with the documents sought by the proponents. (Both letters are included in Appendix D.)

- MTO: "MTO cannot concur with documents we have not seen in their final form." As well, a question about water levels upstream and downstream of Highway 417 was referred to the City and consultants for an explanation.

- MNR: Lists seven items about which information was requested but had not yet been received. As well, this letter also states that "Until such time as the MNR has been provided with the final EA documents and has had an opportunity to review these reports, we are not in a position to concur that they have addressed MNR interests."

(2.) 5. In contrast, in the staff report dated April 5, 2006 and presented on May 3 to a Joint

Committee of Council, it is asserted that "All technical and policy related comments received from the Provincial agencies have been addressed by the Study Team... A series of meetings took place... These meetings resulted in concurrence between the Study Team and the agencies regarding their concerns." (See Appendix E, under "Consultation.") This assertion was not retracted when the report was presented to the Joint Committee. (The Consultation Report does not offer the Minutes of the May 3 meeting. They are available on the City's web site. In it one reads that staff explained to Councillors: "A letter was received yesterday from the Ministry of Transportation saying they are satisfied with the technical information provided and await the review of the Class EAs. Staff spoke to the Ministry of Natural Resources yesterday as well, and they have just two outstanding items that they require of staff, which they will receive and all of this will be reflected in the final EA document.")

6. We submit that staff took too much for granted and was less than transparent with Council regarding the degree and nature of concurrence obtained from provincial agencies. This was consistent with a tendency noticed in earlier meetings with the public. The net result is that Council granted permission to post Notices of Completion and approved the 22 proposed projects without having before it documents that were signed off or even informally concurred with by the responsible agencies. Such precipitous action is detrimental to sound decision making, protection of the environment and the public interest.

7. The staff report for the May 3 Joint Committee meeting (Appendix E, Document 3, 3rd page) included a summary of the public meeting of June 10, 2005, stating that "Approximately 50 people attended..." In contrast, at the Planning and Environment Committee meeting of November 22, 2005, as noted in Minutes 41, Councillor Peggy Feltmate recalled that approximately 100 people attended the June meeting. Some of the undersigned were present at that meeting and would concur with the Councillor's recollection. The wide discrepancy, despite the use of registration lists at public meetings, suggests a bias on the part of the report writers.

## 3. Flow Characteristics and Flood Level Analysis and Post-Development Flow Characterisation and Flood Level Analysis

### 3.1 Incorrect scope

1. Page 11 of the Post-Development Flow Characterisation and Flood Level Analysis (hereafter "PDA") lists the elements of full build-out assumed in the analysis, including the Jackson Trails, Broughton and Interstitial lands. (See also Figure 3b.) Little is known at present about the nature of these developments that were approved in 2005.

(3.1.) 2. Lands belonging to the estates of Del, Brookfield and Westpark (455 ha) also were approved for urban development in 2005, through an OMB Decision and subsequent supporting motions by Council. At the time of writing, Council was approving Terms of Reference for a "Fernbank Community Design Plan" for these lands and two adjacent parcels. The study area comprises a total of 650 ha between Hazeldean and and Fernbank Roads. (See staff report for the July 11, 2006 Agenda of Planning and Environment Committee, Item 18.) We estimate that at least 200 ha of this area drain to the Carp River.

3. The OMB Decision on the appeal of Del, Brookfield and Westpark for urban status of their lands summarized the testimony of John Riddell, witness for the appellants, as follows:

> "1. Stormwater management servicing can be provided for the Del/Brookfield lands and the surrounding vacant lands to the standards of the City of Ottawa and that storm water management facilities can provide water quality and quantity control to meet all regulatory objectives.
> 2. The proposed development will not have an adverse impact on the Monahan Drain Constructed Wetlands.
> 3. The proposed storm water management facilities can provide enhanced water quality and peak flow control over existing conditions, and can enhance base flow conditions to the receiving streams namely the Carp River.
>
> It was his evidence that if the lands were brought into the City of Ottawa urban boundary that a review of the Carp River Subwatershed study would be required as well as amendments to the Flewellyn and Monahan Municipal drain reports." (OMB Decision # 2092, August 11, 2005, page 20.)

The testimony of Mr. Riddell was accepted.

4. In contrast to this expert view, the proponents excluded the impact of urbanization of these Fernbank/Hazeldean lands from their post-development analysis, arguing that the nature of this future development is not known and that in any case such future development will be held to a zero-impact standard. (See, among other places, page 11 of the Consultation Report.)

5. We submit that such "willful blindness" to significant additional future development renders the post-development analysis invalid. It is a certainty that urbanization of the Fernbank/Hazeldean lands will affect drainage to the Carp River. Stormwater management measures including improved functioning of the River and its tributaries are being proposed to accommodate development within Kanata West. It is irresponsible to not allow for the impact of the Fernbank/Hazeldean lands in the post-development analysis and stormwater management plans.

3.2 Model deficiencies

1. The Flow Characteristics and Flood Level Analysis (hereafter "FCA") takes existing conditions as a starting point. However, these conditions include a significant number of floodplain fillings which have been allowed over the last few years in a piece-meal fashion. There is no analysis of the cumulative effect of these incursions and their possible link to the increasing degree of flooding experienced upstream and downstream of Richardson Sideroad and land further downstream. Such an analysis might have concluded that the permissive practices of the Mississippi Valley Conservation Authority are detrimental to riparian landowner rights and should not be continued.

2. As illustrated in Figure 3-3 of the FCA, the models poorly simulate actual water level observations. After the 9 Sep 04 peak at 14h24 at Glen Cairn Pond as a result of "Hurricane Frances," actual observations show the water to be receding very slowly, having not yet returned to their pre-storm levels on 11 Sep at 00h00 (the limit of the graph); we understand that it in fact took about a week for water levels to return to pre-storm levels. In contrast, the models would make one believe that water levels receded rapidly, having returned close to their pre-storm levels by 10Sep at 14h24. Similarly, waters reached their peak at Palladium Drive on 9 Sep at 19h12 and were still well above pre-storm levels at the edge of the graph; in contrast, the models show a peak almost at the same time as at Glen Cairn Pond and rapidly receding levels thereafter. Throughout, simulated water levels are well below actual observations, in the order of 80 cm, even 34 hours after the peak of the storm event.

3. This severe underestimation of actual water levels suggests that the models incorrectly allow for the actual conveyance capacity of the Carp River in this reach and further downstream. Because this is the key inference required in post-development analysis, any such inference is unreliable with the current models. Specifically, in light of this crucial deficiency the conclusion is not warranted that development in Kanata West will not cause elevated flood levels downstream or increased duration of flooding. Similarly, the model cannot be relied upon to assess consistency of the watercourses restoration project with the criteria imposed by the *Lakes and Rivers Improvement Act.*

4. The design storm used in the models is the September 24, 2004 tail of Hurricane Frances. However, inspection of the publicly available flow measurements at the Kinburn gauge (downstream of the proposed Kanata West development) reveals that the spring freshet of that year resulted in considerably higher and more prolonged flows than did the September event. While this may be explained in part by the fact that the Kinburn gauge reflects a subwatershed that is rural, this evidence does raise some doubt about the correctness of the performance standard used.

(3.2.) 5. The FCA (on page 3-4) explains that the Manning *n* parameter was increased by 50% in all scenarios in order to have simulated results come closer to observed data. (Nonetheless, as noted above, the model results remain grossly deficient.) A comparison of parameter values in Appendix C of the FCA and in Appendix B of the PDA reveals that no further adjustments were made in the post-development analysis. Yet, on page 19 of the PDA it is asserted that this was done! (Figures 5.1.2(a), 5.1.4 and 5.1.5 in the Restoration EA clearly show that vegetation in the fringe areas is proposed to be quite different from present conditions.)

6. All these deficiencies of the models in the FCA and the PDA introduce a bias towards not finding increased flooding as a result of development. There are other deficiencies which a peer review could reveal but we trust that the points made suffice to conclude that the modeling exercise needs to be redone.

7. An important reason for poor performance of the models is that key field data to properly calibrate the models were not available to the consultants (see the PDA, page 7). The 2004 Carp River Watershed/Subwatershed Study, in para. 9.7.2, made the following recommendation:

> "There is currently only one flow gauge (located near Kilburn) which provides continuous flow results. It is recommended that flow monitoring at two additional sites be undertaken. Information would be used as input to establishing base line conditions and monitoring effectiveness of various measures as they are undertaken."

and further:

> "The estimated cost to purchase two level recorders and one portable velocity meter (to establish stage/flow curves) is approximately $10,000. Monitoring could be undertaken by agency staff."

This recommendation was not implemented.

3.3 Remedy sought

1. We submit that the magnitude of the proposed development and the complexity of issues it raises justify ordering an individual Environmental Assessment of all projects we object to as specified in our letter. Should such an Order be issued, then, with regard to the flood level analysis, the Terms of Reference for this Assessment should include the terms specified in paragraph 3.3.2.

2. Alternatively, we submit that these proposed projects should not be approved until the flood level analysis of existing and post-development conditions has been re-done under the following stipulations ("Conditions" as per sec. 16(3) of the EAA):

(3.3.2.) a) The lands in the Fernbank Community Design Plan study area should be included in the post-development analysis. Parameter ranges should be used where specific knowledge of the nature of the development is not known.

b) The impact of post-1982 modifications to the floodplain should be identified.

c) Additional gauges should be installed and the data used to further calibrate the models.

d) The model performance standard should be demonstrated to be representative of actual flow observations.

e) In the post-development analysis, the Manning *n* parameter should be adjusted in accord with the proposed denser vegetation in the flood fringe.

f) Other stipulations to be approved by MNR and MOE.

g) An independent peer review of the revised analyses should be ordered, reporting to the Minister and the public.

3. Alternatively, mediation could be ordered. With regard to the flood level analysis, such a mediation effort should include appointment of an independent peer review panel that would report to the Minister and the public on the adequacy of the revised work.

## 4. Kanata West Master Servicing Study

### 4.1 Projects

1. Because of the fundamental deficiencies in the flood level analysis, several of the sanitary servicing projects should not be approved until these deficiencies are rectified. When more reliable post-development model results on anticipated flood levels are in hand, the design of these projects or the Master Plan itself may have to be amended. The following Sanitary Servicing Projects are affected:

   - Trunk Sanitary from Silver Seven & along Carp River between Maple Grove Road and Palladium Drive
   - Signature Ridge Pumping Station Upgrade and associated gravity sanitary sewers

2. The Kanata West Pumping Station is also affected, but in the knowledge that in fact a temporary pumping station would be constructed west of the Carp River and that, in the early stages, only the trunk sewers west of that station along Maple Grove Road and Huntmar Drive would be installed, we do not formally object to the “Kanata West Pumping Station and associated gravity sanitary sewers.”

(4.1.) 3. The proposed stormwater ponds and associated sewers along the Carp River should not be approved until more reliable post-development model results on anticipated flood levels are available. How well these ponds work is in part dictated by flood levels. E.g., higher than anticipated flood levels could result in resuspension of solids. These Stormwater Management Projects are:

- Stormwater Management Pond #1 and associated storm sewers
- Stormwater Management Pond #2 and associated storm sewers
- Stormwater Management Pond #4 and associated storm sewers
- Stormwater Management Pond #5 and associated storm sewers

4.2 Remedy sought

1. We submit that all Studies, Master Plans and Assessments under review, including this Master Servicing Study, should be integrated in one individual Environmental Assessment.

2. Alternatively, we submit that the named projects should not be approved until the flood level analysis of existing and post-development conditions has been re-done under the stipulations spelled out in para. 3.3.2 above and any implications are incorporated in revised plans and designs.

3. Alternatively, mediation to resolve all outstanding concerns could be ordered.

5. <u>Kanata West Transportation Master Plan</u>

5.1 Comments

1. Surprisingly for a Transportation Master Plan, the Report does not contain an overview Figure showing the existing and all proposed or planned roadways in and around the Kanata West Study Area, apart from the very schematic Kanata West Concept Plan shown on the cover page, in Figure 1-1 and in several other places. Figures 6-1 and 6-2 do not show all planned roads, e.g. Local Road ‘A’ shown in Figure 7-1 is absent.

2. There are apparent inconsistencies in the design data of some of the proposed transportation projects. E.g., Figure 7-1 (Campeau Drive Extension), at the bridge over the Carp River, shows a water level of 93.75 m, while at the bridge of the local road over Feedmill Creek, upstream, the level shown is 93.70 m.

3. On the same Figure, details of two road crossings over Feedmill Creek are shown. These would be in addition to a Rapid Transit Corridor crossing, and the existing

crossing of Huntmar Drive. To the west of Huntmar Drive, no planned roads are put forward to serve the areas between Highway 417 and Feedmill Creek. Presumably at a later stage at least two more crossings will be proposed there. This multitude of crossings puts into question the advisability of the transportation plan north of Highway 417 and east and west of Huntmar Drive, except perhaps for the location of the Campeau Drive Extension.

(5.1.) 4. With two exceptions, the uncertainty of anticipated flood levels renders it inadvisable to approve any transportation projects in so far as they cross watercourses in Kanata West. More reliable model results may affect the design of these crossings.

5. The first exception regards the crossing of Huntmar Drive Extension over Poole Creek. The recommended option is the least attractive on Fisheries, Wildlife Corridor and Floodplain criteria (see Option C, Table 6-9 on page 96). We appreciate, however, that other constraints had to be considered and therefore reluctantly raise no objection to this crossing and the Hazeldean Road Extension project.

6. The second exception regards the Campeau Drive Extension. The design of its crossing over the Carp River should be reviewed after the flood level analyses have been revised. However, we are advised by MOE staff that objection to one part of the project will put the whole project on hold until the Minister decides. We do not wish to impede the Owner's ability to construct the short stretch from Didsbury Road to before the River crossing and understand that the bridge and the further extension west of the River will not be built for some time. For this technical reason, therefore, we do not object to the Campeau Drive Extension project.

5.2 Remedy sought

1. We submit that all Studies, Master Plans and Assessments under review, including this Transportation Master Plan, should be integrated in one individual Environmental Assessment.

2. Alternatively, approval of the following projects should not be approved until inconsistencies in the design of various crossings have been rectified, and until the flood level analysis has been revised:

   - Maple Grove Road Widening from west of Huntmar Drive to Terry Fox Drive
   - North-South Arterial from Hazeldean Road to Campeau Drive Extension

3. Alternatively, the outstanding concerns could be resolved through mediation.

6. Carp River, Poole Creek and Feedmill Creek Restoration
Class Environmental Assessment

6.1 Incorrect scope

1. The 2004 Carp River Watershed/Subwatershed Study identified the need for restoration of both the urban and rural reaches of the Carp River and its tributaries. This is consistent with the November 22, 1909 Ontario Court of Appeal confirmation that a Sufficient Outlet for the proposed drainage work was below Carp Village. Simply put, as a result of failure to maintain this Drain, of ongoing less than optimal practices by some riparian landowners, and of urban development and intrusions into the floodplain, the Carp River increasingly suffers from aggradation and sediment build-up. As a consequence, downstream landowners have experienced a tendency for flooding, especially spring flooding, to have increased over the years.

2. The only flood damage issue in the urban reach of the Carp River identified in the 2004 Carp River Watershed/Subwatershed Study relates to Glen Cairn, upstream from the Kanata West development (refer to para. 8.3.11, page 137). In the rural reach, on the other hand, the extensive flooding problems are noted (refer to para. 8.2.1.1, page 122).

3. We noted in para. 3.2.3 above that the models utilized for the flood level analyses do not adequately simulate the actual conveyance capacity of the River, especially downstream of Kanata West. The inference that planned development will not cause increased flooding is therefore not warranted. Worse, the proposed restoration undertakings are limited to the urban reach and do not come to grips with the fact that the River will continue to perform sluggishly downstream. As a result, following restoration work upstream, aggradation in the upper reaches will re-occur, likely even more rapidly than in the past as a result of urbanization. Without resolution of the flooding issues downstream, the upstream restoration work will eventually be for naught.

4. We submit that restoration of the River, also intended to mitigate quality and quantity issues caused by new development, must adopt a comprehensive approach, tackling both urban and rural reaches up to the 1909 Sufficient Outlet below Carp Village. Further, logic suggests that the restoration works (using natural channel design principles) begin downstream and work their way up, to avoid the risk of seeing nature undo upstream restoration.

5. About a dozen rural landowners have made representations to members of the Coalition that they are prepared to contribute land so as to enable restoration in accord with natural channel design principles.

(6.1.) 6. Over the last month, some of the Kanata West landowner representatives have approached the Coalition with suggestions on how restoration of the rural reach could be accomplished and financed. Initial indications are that both staff and Councillors might concur with the suggestions. We are heartened by these initial steps and trust that the dialogue will continue.

6.2 Incorrect assessment process

1. In its review of existing conditions of the Carp River within Kanata West, the Restoration EA does not signal flooding nor erosion problems except for "erosion potential" (see pages 61-62). In Table 4.5.1 (pages 68-69) there is again no mention of a flood control criterion (only of "Improvement/maintenance of flow conveyance/flow regime") while erosion conditions are now said to be "generally uniform along entire reach." There are similar discrepancies between the findings vs. restoration criteria for Poole Creek and Feedmill Creek (Tables 4.5.2 and 4.5.3). The reference to erosion conditions being uniform along the entire reach is odd in light of the River's acknowledged major problem, namely sediment deposition and sluggish conveyance.

2. The June 2000 Municipal Class EA manual, in Appendix 1, provides a long list of water projects that could qualify as Schedule B projects, including:

   > "20. Works undertaken in a watercourse for the purpose of flood and erosion control..."

   None of the water project Schedule C examples relate to flood or erosion issues or to watercourse restoration.

3. In a letter made available to Planning and Environment Committee for its meeting of June 13, 2006, an MOE Environmental Assessment Coordinator for the Eastern Region advises:

   > "Tributary rehabilitation and stream restoration projects are not subject to the Municipal Class EA unless they are works undertaken in a watercourse for the purpose of flood or erosion control. If the proposed projects are for the purpose of flood or erosion control, <u>the Master Plan must be very clear on how the outcome of these projects will solve specific, identified erosion or flooding problems</u>. If the proposed projects are not for the purpose of flood or erosion control, then they should not be planned in accordance with the Class EA, and the proponent should investigate whether other EA processes apply to the projects (i.e. MNR Class EA, individual EA under the *Environmental Assessment Act*)."
   >
   > (Letter from Vicky Mitchell to Cheryl Brouillard, dated May 19, 2006, regarding the Barrhaven South Community Design Plan, page 2; emphasis added)

(6.2.) 4. Section 2.3 of the Conservation Ontario Class EA document for Remedial Flood and Erosion Control Projects states:

> "Remedial Flood and Erosion Control Projects refer to those projects undertaken by Conservation Authorities, which are required to protect human life and property, in previously developed areas, from an impending flood or erosion problem. Such projects do not include works which facilitate or anticipate development. Major flood and erosion control undertakings which do not suit this definition, such as multipurpose projects, lie outside the limits of this Class and require an Individual Environmental Assessment."
> (Emphasis added)

While formally the Kanata West proponents are not subject to this guideline, the intent of the law clearly is that an undertaking to correct existing flooding problems may qualify as a Schedule B Municipal Class EA project or as a CA Class EA Remedial Flood and Erosion Control project, but that projects to mitigate potential flooding as a result of new development must be assessed as an individual EA.

5. The then Supervisor, Project Review Unit, MOE Environmental Assessment and Approvals Branch, advised:

> "Class EA projects have predictable and mitigable environmental effects. Class EA projects are characteristically recurring, similar in nature, limited in scale, have a predictable range of environmental effects, and are responsive to mitigation."
> (E-mail from Paul Heeney to one of the undersigned, dated March 29, 2006)

6. We submit that the Class EA process is not appropriate for this Restoration work and that its nature, scale and purpose dictate that it should be assessed as an individual EA. Co-proponency by the Conservation Authority, the City of Ottawa and the Kanata West Owners Group seems indicated.

7. The MNR Ottawa Stewardship Coordinator has indicated to the Coalition that he is prepared to coordinate the planning, design and implementation of a comprehensive restoration of the Carp River and its tributaries.

6.3 Lack of integration with other studies under review

1. To cite just one example of incomplete integration of this Restoration EA with other reports under review, Figure 5.1.5 in the Restoration EA (on the Feedmill Creek restoration proposal) does not show the roads depicted in Figure 7-1 of the Transportation Master Plan (on the Campeau Drive Extension). We could list other examples.

6.4 Feedmill Creek

1. Para. 5.1.2 above noted that Feedmill Creek would require at least six crossings. Apart from the expense involved, so many structures over this short distance put into question whether this is in the best interest of the Creek.

2. An alternative, to relocate the Creek by having it turn north (west of the proposed North-South Arterial) and, once north of the proposed Campeau Drive Extension, turn towards the Carp River, does not appear to have been considered. Yet this would not only save considerable expense but would also provide an opportunity to have the Creek function properly as a tributary. We anticipate that there would be a net benefit compared to the proposal under review.

6.5 Relief sought

1. We submit that all Studies, Master Plans and Assessments under review, including this Restoration EA, should be integrated in one individual Environmental Assessment. Should such an Order be issued, then, with regard to the Restoration component, the Terms of Reference for this Assessment should include the terms specified in paragraph 6.5.3.

2. In the alternative, the Restoration project should be assessed under the Individual EA process. Again, the Terms of Reference for such an Assessment should include the terms specified in paragraph 6.5.3.

3. As a next-preferable alternative, the following Conditions should be placed on approval of the Restoration undertaking:

   a) The scope of the undertaking should include both the urban and rural reaches of the Carp River, up to below the Village of Carp.

   b) The project should be conceived and executed starting at the downstream end.

   c) The assessment should be fully integrated with other proposed undertakings.

   d) Relocation of Feedmill Creek north of Campeau Drive should be examined.

4. A final alternative is that the Restoration proposal be sent to mediation.

## 7. Concluding comment

1. In the event that it is decided to only order a revision of the flood level analysis, or only a re-scoping of the Restoration undertaking and its elevation to an individual Environmental Assessment, or both, then we request that the Minister also require Addenda to the Servicing and Transportation Assessments in order to accommodate any implications from these revised studies.