

October 31, 2018

Re: Feedback on the Ottawa River Watershed Study Report

Thank you for providing the opportunity to comment on the draft report. Overall, it is a good stocktaking report that can become ever more complete over time through further engagement and development. It highlights the fragmentation and complexity of the jurisdictional, data collection and analytical frameworks involved. It also underlines the challenges of undertaking even traditional baseline watershed management for such a large and diverse watercourse as the Ottawa River, let alone integrated watershed management which takes into account climate change imperatives.

Some specific observations:

Page 11 - Federal responsibilities

An Act respecting certain Works on the Ottawa River (1870)

We note that this legislation (see text attached), which is still in effect as far as we can ascertain, has not been recorded in the study. We have heard from sources within the Quebec government that the attribution of sole jurisdiction over works on the Ottawa River to the federal government under the terms of this Act is one of the reasons multi-jurisdictional approaches have failed to rally the federal-provincial collaboration essential to the management of the Ottawa River Watershed.

<https://laws-lois.justice.gc.ca/eng/acts/O-9.5/FullText.html>

Page 46 - CNL operations at Chalk River

The activities of CNL at Chalk River are briefly described in this section under Other Economic Considerations. However, neither here, nor under Threats on page 60, are plans for the decommissioning of the research laboratories and the long term in situ storage of nuclear wastes from this site, and from other sites across Canada, mentioned or discussed. This is a significant emerging threat which warrants more attention in the report. The slide presentation attached, provided by permission from one of our associates, gives the best current information on the situation.

Editorial note: On page 60, middle of the first paragraph. The sentence starts with "As discussed in section 3.3.2". This is self-referential as the sentence is part of section 3.3.2.

Page 54 - Natural Values

A quote from page 55: "Often, intrinsic values assigned to the environment are based on complexity, beauty, diversity, wonder and wildness (Sandler, 2012)."

The single most wondrous feature on the whole 1,300 km course of the Ottawa River is undoubtedly the Chaudière Falls, long shackled and shielded from view by industrial development. This natural wonder, and the potential to revalorize it as part of planned redevelopment, should be referenced in the report. The Chaudière Falls also have a traditional spiritual value for the Algonquin people, a fact that should be mentioned under Spiritual Values on page 51. See this link for more background: <https://freethefalls.ca/>

Page 96 - Summary of views on issues and concerns related to the health of the Ottawa River watershed

This table is symptomatic of a certain lack in the overall perspective of the report. We see climate change in several places in this table, but always as something external which may have an impact on some aspect of the health of the watershed. We mention in our opening paragraph "integrated watershed management which takes into account the climate change imperative." It is our view that climate change ought to be more central to the analysis, considering issues in the reverse direction as well. What is the impact of the watershed on climate change? Mitigation, carbon capture, cooling effects? Or, conversely,

acceleration, heat islands, GHGs emissions? Issues and measurements regarding the entire water cycle, groundwater infiltration, runoff, evaporation, precipitation, then come into play, as do other interactions between ground cover, land use and meteorological phenomena. Adding this perspective, and the related indicators and measurements it implies, could provide a unifying framework for a watershed management plan that goes beyond water quality and other traditional concerns. This recent article on emerging science on the connection between ecology and atmospheric sciences pertains.

<https://www.theatlantic.com/science/archive/2018/10/how-forests-affect-climate-change/572770/>

On a final point, we note that on page 117, the Plan d'Action Saint-Laurent is given as a Canadian case study that could help shape next steps in moving towards an integrated watershed management plan for the Ottawa River. This should perhaps more than a case study. The Ottawa River is after all a tributary of the St-Lawrence River and perhaps a first best near term solution would be to integrate the Ottawa River watershed management with the well-established structures and approaches used in the Plan d'Action St-Laurent. This possibility is worth investigating.

We are happy to see this first step taken in the management of the Ottawa River watershed as whole. We hope that it will lead to effective measures to promote and maintain the health of this beloved river that runs through the heart of the nation's capital area, while keeping the focus on the overarching priority that is climate change.

Paul Johanis
Chair, Greenspace Alliance of Canada's Capital