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Submission to the Panel on the Future of the  
Trent Severn Waterway  
July 4, 2007

First may I compliment the panel members and your staff for the excellent background documents and discussion documents and thank you for your willingness to travel widely and for formulating an open, transparent process.

I hope that you are able to create a “New Vision” that will protect and maintain the TSW with sustainable funding, improved recreational opportunities, better water management and more effective governance while contributing to the demand for clean energy.

In this submission I want to raise five issues.

First, the TSW has suffered from a climate of funding neglect. I am concerned that if this continues the infrastructure will eventually fail. I hope you are able to provide the Minister with a concrete estimate of funding needed to ensure sustainability. It would be tragic if takes a system failure before action is taken, as was the case at Walkerton. Regrettably the “squeaky wheel” syndrome is alive and well in Ottawa.

Second, I suggest that the TSW has to be more active in increasing the recreational and educational experience to a wider audience, especially from the “Golden Horseshoe”. Greater public appreciation and sense of “ownership” should lead to greater pressure to enhance the TSW and ultimately this should induce political response in the form of more appropriate funding. I suspect that higher user-fees will have the opposite effect. The population of Toronto who want to share the outdoor experience can no longer afford to buy a cottage in Muskoka! They need more access to a diversity of public parks and natural spaces.

Third, it is clear that as governance has evolved it has become more complex, less responsive, less transparent and less accountable. A new model is needed as is discussed in your background documents.

Fourth, there is a need to re-think the TSW water management process. Balancing the competing demands is difficult and contentious but the availability of modern computer modelling tools and public access to the internet can make the day to day decisions more transparent and thus acceptable to the stakeholders as you control flows and water levels.

This brings me to my fifth and primary issue, the possible effects of climate change. There is now no doubt that high CO<sub>2</sub> levels are causing a global temperature increase, especially at the Poles. Here at about 45° latitude the primary impact is likely to be climatic instability, i.e. more episodes of extreme weather. It is impossible to predict if the local effects will be more flooding of the type that hit Peterborough in July 2004, or severe droughts, or both. The implication is

that the TSW must be prepared to respond to greater extremes in weather and climate. The TSW engineers already do an excellent job of outreach, but this effort needs to be increased. An updated and transparent Acres water management model would be invaluable for explaining to the public how current conditions are affecting flows and levels.

In these water management decisions I believe that there should be a clear statement of the three priorities.

The primary responsibility of the TSW is to ensure public safety by protecting infrastructure, maintaining ecosystem integrity and preventing excessive flooding while providing navigable waterways, largely for recreational boating.

A second priority is to minimize the impact of water level drops in the Haliburton Lakes where there are severe ecological effects and human inconvenience and distress, especially during dry summers. I suspect that you will hear much more on this from the Coalition for Equitable Water Flows as you journey to Minden and Haliburton. I also understand that there is an upcoming report by Ecoplans on this topic which should be useful to you.

The third priority is provision of water for energy generation. Unfortunately the demand for clean electricity is highest in the Summer when water flows are lowest. There are opportunities to improve the efficiency of existing generating systems on a case by case basis and there are opportunities to install small systems in or around dams especially as they are renovated. There has been an enormous increase in the availability and efficiency of small and micro hydro systems. I “Googled” small hydroelectric and got over 2 million hits! Small non-disruptive systems at TSW dams can also have an educational benefit.

Let me conclude by giving you an example of a local proposed development at Locks 22 and 23 which I note is designated as a “selected cultural landscape” in your background documents. There is a proposal by Trent Rapids Power Corp, Trent University and Peterborough Public Utilities, subject I presume to TSW approval to build a large canal to divert the river between the two locks and a generating station on Trent University land. It is a shining example, in my view of what should not be done. It is an example of poor governance. I append a letter that I wrote to the TSW some months ago on this project. Briefly, this project

- \$ will destroy an irreplaceable area of natural significance and create an eyesore on the banks of the Otonabee River. It is totally contrary to the intended uses of the lands acquired by Trent University some 40 years ago with the support of the community as natural lands available for campus expansion, research, recreation and education for the University and Peterborough communities,
- \$ has been promoted in a non-transparent, even secretive manner with only token public input,
- \$ apparently has benefits to the parties which have not been disclosed and should have been documented in the Environmental Impact Statement, despite the large subsidy from the public purse,
- \$ will probably result in pressure from the operators for the TSW to increase water flows during the summer when flows are low and lake levels are dropping. I note the

submission from the Ontario Waterpower Association that stresses their desire to “Re-balance priorities on the TSW-from the primary of navigation to multiple benefits” and one that “uses storage reservoirs to a much higher degree for flow attenuation” and “positive waterpower revenues as a key contribution to water resource management”.

I hope that your “new vision” will encourage more enlightened examples of planning.

Finally, on a more lighthearted note I bring to your attention two matters that are highlighted in the excellent book “A Respectable Ditch: A History of the Trent Severn Waterway 1833-1920 by James T. Angus. (McGill-Queens University Press 1988) It was almost exactly 174 years ago that 5 respected representatives of the public namely Commissioners Bethune, McDonell, Hall, Brown and Need met a short walk from here, probably at Bethune’s store at Charlotte and Water Streets in Peterborough to initiate the first step in the long process of constructing the TSW.

The outstanding contributor to the construction of the TSW was, however Nichol Hugh Baird. It was his route and plan that prevailed. “Without his exertions and exhortations the beautiful waterway which has given pleasure and recreation to millions during the last 60 odd years might never have been. Like many of Canada’s other fine engineers who designed and built the canals, the railways, the bridges, the public buildings, the whole physical fabric of the country, Baird has been ignored by history.” (Angus 1988)

Perhaps you 6 respected representatives of the public can, in a new century, present a “new vision” and make exhortations to his namesake the Honourable John Baird to raise the TSW to a new level of sustainability to be more valued for public recreation, to bring greater economic benefits to the communities on the Canal and to be more appreciated as a key component of Canada’s heritage.

Thank you!

## Appendix

Director of Water Power  
Trent Severn Waterway  
PO Box 567 2155 Ashburnham Dr.  
Peterborough, Ontario  
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May 10 2007

Dear Sir,

I am writing to express two concerns about the Environmental Impact Statement for the proposed Trent Rapids Hydroelectric project.

First, is an ethical issue relating to the very nature of the project and how it has been advanced. In a far-sighted and at the time controversial initiative, the Founders of Trent University were gifted, purchased or expropriated the lands around what is now the Symons Campus. The aim was to provide space for the University to grow and to do so in a setting that would be used for academic research and be maintained in a freely available natural state for the education and enjoyment of the citizens of Peterborough.

These “endowment lands” or “nature areas” have become an integral part of the vision of the University and its place in the community. The present Board of Governors of Trent (most of whom do not live in or near Peterborough) views the lands as an asset to be exploited for profit, hence the Trent Rapids Proposal. This disruptive project will destroy one of the Nature Areas, eliminate its recreational and educational features and it will constrain future growth of the campus. In my view, while the Board may have acted legally, it has acted unethically, especially because there has been no consultation with the Trent or Peterborough or wider community about whether the project should go ahead or not. The public meetings have been for information only and essentially have addressed issues such as landscaping the huge piles of blasted, excavated rock.

Second is the nature, intent and conclusions of the Impact Statement. The generally accepted concept of Environmental Impact Statements is that an attempt is made to describe and balance the benefits of the project (which can usually be measured in dollars) against the social, ecological or environmental disbenefits which can not usually be expressed in dollars. A subjective conclusion is then reached from a totally transparent analysis. The Impact Statement does a fair job of describing the obvious ecological impacts then it reaches a subjective conclusion on page 120 namely, with my emphases:-

“While the proposed project has a terrestrial impact, as do these other construction projects, in addition to **bringing very significant economic benefits to Trent University and the City of Peterborough**, and in marked contrast to these other economic development

projects, the proposed small hydro project brings with it very significant environmental benefits in terms of the abatement of 20,000 to 30,000 tonnes of carbon dioxide annually as well as many thousands of kilograms of nitrogen and sulphur oxide air emissions. It is these ongoing environmental and economic benefits that can be seen as compensating society for the aesthetic and spiritual loss associated with the cutting of the mature trees on the project site.”

There is no documentation at all on p119 about the “**significant financial benefits**” to Trent, the Trent Severn Waterway, or the Peterborough Utilities Commission. In my view, the total lack of transparency about these benefits invalidates the conclusions and is cause for rejecting the Impact Statement. Let me elaborate.

Five agencies are involved in this process, four of which are, in principle, fully accountable to the public. Parks Canada as part of the Federal Government has ultimate authority for the Waterway, The Province of Ontario is heavily subsidising the project by offering some 11 cents per kilowatt hour for the electricity when the going rate is about 5 cents. The PUC is owned by the City of Peterborough. Trent University is a public institution. Only Trent Rapids is private and can justify commercial confidentiality, but it is the only corporation that holds a lease on this land. There is thus no competition. A 8 MW power station will generate some \$7 million per year in income over half of which will come from the Ontario Taxpayer, but there is no information on how this will be disbursed. Given the outrageous recent behaviour of some Hydro One executives one would have hoped for a greater sensitivity to the need for public transparency in the electricity supply industry!

In summary, the project will cause severe and irreversible ecological/environmental disruption, the decision to promote the project has been done behind closed doors with no public impact and it is in ethical conflict with the original intent for the lands. The Impact Statement reaches totally unsubstantiated conclusions about the public benefits of the project. What is needed is a reassessment and disclosure of these benefits and a more thorough evaluation of the options for smaller, technologically innovative and less disruptive projects at all four locks between Trent and Lakefield.

Sincerely yours,  
Donald Mackay