

February 3, 2008

Dalton McGuinty, Premier
Legislative Building
Queen's Park
Toronto ON M7A 1A1

By Fax: (416) 325-3745

Re: Provincial Approval of Carp River Floodplain Development
How could it happen?

Dear Premier McGuinty,

I am requesting your intervention in a planned project, which, if allowed to proceed, will place the lives and property of Ontarians, and visitors to the Nation's Capital at risk.

The project I am referring to is the "Carp River Restoration Plan", a Class Environmental Assessment prepared by the City of Ottawa and Kanata West Owners Group that has already been accepted by the Ministry of Natural Resources (MNR) and Ministry of Transportation (MTO), and awaits the Approval of the Minister of the Environment.

Recognizing the risk that natural hazards pose to the public, the Provincial Government has passed Legislation, and adopted Regulations, Polices, and Technical Guidelines to safeguard the lives and property of its residents and to facilitate sustainable development and orderly growth. It would appear that the City of Ottawa, Mississippi Valley Conservation (MVC), MNR and MTO – and over half a dozen of the largest Consulting Engineering firms in the Province have disregarded established standard procedures on which the Public's Interest being served depends.

You've likely heard the saying, "If it sounds too good to be true, it probably is". I can't think of a better way to describe the proposal to fill and develop floodplain on the Carp River in Kanata West. This 700 Ha future development area is where more than 6,300 homes are to be built, 17,000 people are to live, 24,000 people are to work, and more than 1,000,000 square meters of commercial development are to be built.

On one hand, the proponents of the Kanata West development have identified the need to increase the capacity of major infrastructure and transportation systems in 21 of 22 Class EA projects. On the other hand, we are to believe that all of the development can proceed, including 28 Ha of development encroachment into the floodplain, while narrowing the natural drainage system, AND flood levels will be reduced!

Premier McGuinty, I have recently discovered the most egregious error in the work prepared by the proponents who are advocating in favour of the floodplain development. If you can believe it, the impact assessment failed to account for any of the runoff volume that will be generated from the Kanata West development area! That's right – not a drop of runoff leaves the Kanata West site in their analysis. I believe this explains how the proponents believe that 700 Ha can be developed – including 28 Ha of floodplain - and flood levels will actually be lowered.

I can't imagine such a mistake being made, and not be caught by the multitude of Professional Engineers employed by the City, MVC, MNR and MTO who supported the

floodplain development project by their Approval. The fact that I was able to discover this error less than two days after receiving the computer modeling leads me to think that none of these agencies actually reviewed the work prepared by the Consultants. I am further concerned because this error went undetected by some of the largest Consulting Engineering companies in the Province that claim to have in-place Quality Control and Quality Assurance processes.

I can't imagine if the transportation models prepared for the Kanata West development showed trip generation demands declining, hence eliminating the need for the extension of the West Transitway, or expansion of major arterial roads, some doubt would not have been raised that there could be a problem with the impact assessment.

What makes this situation even more disconcerting, in my Professional Opinion, is the apparent lack of caution considering the recent history of flooding on the Carp River just upstream of Kanata West – and the vulnerability of the two Highway 417 bridge structures over the Carp River that are already substandard under design flood conditions.

My analysis shows that by making corrections to just four lines in the computer model, flood levels will actually be 0.5m higher than the aforementioned agencies have understood the levels to be. My judgment tells me that further corrections to the modeling required to elevate it to the standards required by MTO and MNR Design Guidelines could result in further flood level increases, perhaps by another 0.5m. These changes include the impact of the future development of 300-400 Ha in the Fernbank Community and Carp Road Corridor Community Design Plan areas that were not accounted for in the planning and design of the project.

The potential consequences, should the project go forward, are extreme. Residential and commercial developments that have previously been allowed to encroach into the floodplain in the Terry Fox Business Park and Glen Cairn areas would be at risk, as would be the security of the Highway 417 bridges. The underestimation of flood levels could have resulted in 500-1000 future homes being at risk.

Premier McGuinty, Class Environmental Assessment projects are intended to streamline the planning process for projects that are routine, and where the impacts are easily understood and are predictable. The failure of the entire Regulatory system to detect the egregious error made in the impact assessment demonstrates that the project does not qualify as a Class Undertaking.

I respectfully request that you ask MOE Minister John Gerretsen to Order the Carp River Restoration project be subject to Part II of the *Environmental Assessment Act*. I further request that you ask Municipal Affairs and Housing Minister Jim Watson to suspend any *Planning Act* Approvals involving Carp River floodplain until the public can be satisfied that the flood plain analysis has been completed to Provincial Standards.

Yours truly,

Original Signed and Sealed

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