



# Ottawa Riverkeeper

Sentinelles de la rivière des Outaouais



*A healthy, ecologically sustainable Ottawa River available for all  
Une rivière des Outaouais en santé et gérée de façon durable pour le bien-être de tous*

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December 19, 2003

Leona Dombrowsky,  
Minister of the Environment,  
12<sup>th</sup> Floor, 135 St. Clair Avenue West,  
Toronto, Ontario M4V 1P5

## **Re: Moratorium on Water-taking in Ontario**

Dear Ms. Dombrowsky;

We were pleased to hear your recent announcement of a one-year moratorium on some forms of water-taking in Ontario to permit the preparation of the watershed-based water budgets called for by the Walkerton Commission. The absence of such watershed-wide, science-based thinking within the Ottawa River watershed was a major reason, in fact, why *Ottawa Riverkeeper* was formed and became a licensed member of the international Waterkeeper Alliance in 2001.

Key elements of your moratorium rationale repeat central points raised by *Ottawa Riverkeeper* in February 2003 regarding the previous Ontario government's granting of the water-taking request of OMYA Canada Inc. from an Ottawa River tributary (the Tay River). Your initiative is doubly gratifying in light of members of the Cabinet of the day condemning our statements as being "uninformed and irresponsible". So thank you, on both counts. Having said that, however, there are additional measures which would constitute both appropriately and constructive additions to the initiative you have announced and we wish to bring these to your attention now.

These include the following concerns:

- a one year moratorium seems far too short a time in which to achieve the important but ambitious goals described in your news release. The moratorium should be extended to two years in length in order to provide the Technical Experts Committee

with sufficient time for appropriately comprehensive research, consultation and discussion with both the concerned public and the Implementation Committee.

- . it appears that additional water-taking requests for golf courses and mine de-watering are excluded from the moratorium. They should not be as both are serious concerns within the Ottawa River watershed and beyond. A proliferation of golf course development, for example, appears to be placing a heavy burden on the watershed sustainability in thin-soil areas of Lanark, Leeds and Grenville and Ottawa. Accordingly, we need to have clear, dependable water budget information before additional commitment are made in these areas. Similarly, de-watering of major industrial sites such the Adams Mine in the headwaters of the Ottawa River (apparently beyond the geographic reach of the present moratorium) present major challenges to watershed protection. Such initiatives also should be put on hold until the committees have done their work.
- . The Technical Expects Committee mandate is too narrowly focused on the *volume* of water being taken without sufficient consideration of the ecological factors which are critical to maintaining water quality beyond the achievement of minimal public health standards. The threat assessment mandate of the Technical Expects Committee should be expanded to include consideration of the protection needs of ecological functions and features which support the integrity (and thus water quality) of watersheds.
- . membership of the Technical Expects Committee should better reflect the need for the input of an ecological integrity perspective by the addition of one or more watershed ecologists.

I would appreciate *Ottawa Riverkeeper* being added to the appropriate contact lists so that we may stay current with your Ministry's activities on this important undertaking. We will continue to develop and share our independent, science-based, citizens' perspective on this issue which is of such great importance to Ottawa River citizens in Ontario and beyond. We look forward to working with your officials and representatives in this regard.

Finally, please advise us at your earliest convenience which, if any, of the above *Ottawa Riverkeeper* recommendations you would not expect to be able to include in the water-taking review process.

Yours very truly,

George Brown,  
President