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March 4, 2005

Subject : EBR Registry Number IA05E013 - Permit to Take Water
Riverbend Golf & Country Club, Ottawa

Dear Mr. Hammond:

Ottawa Riverkeeper has concerns about the recently applied for Permit to Take Water from Ottawa's Riverbend Golf and Country Club. The club is situated on the Jock River, a tributary of the Rideau River – one of Canada's Heritage Rivers.

Due to urban growth and development, the natural flow regime of the Jock River has suffered significantly over the years. Much of the stormwater runoff from the watershed is channeled into the sewer system and delivered to the wastewater treatment facility, far away from the Jock River watershed boundaries. This trend, combined with water withdrawals has had a significant impact on the baseline flows in the river.

In the last decade we have experienced low flows so severe that many of the Jock River headwater wetlands and tributaries have gone dry. In each of these situations, there was insufficient water in the mainstem of the river to sustain the valued aquatic ecosystems in the river.

In reviewing the flow data for the Jock River, it appears that the Golf Course has applied to take anywhere from 87% to 126% of the total flow of the river (depending on the flow data used). Of course, if these numbers were correct, this permit to take water would be unacceptable and deemed in violation of Provincial and Federal regulations. I understand there are provisions to ensure a minimum flow in the river, however, given the low summer flow conditions in the Jock River I believe there should be no water taking at all during the summer months.

The applicant's permit states that "there will be zero taking at any time when the Jock River water level 105.83 is achieved and water taking will not be

restarted until elevation 105.87 is achieved". I would like to know what instream flow these water levels correspond to and at what location the referred to levels will be measured. Who will be responsible for monitoring compliance with withdrawals during summer low flows?

Given that the Province of Ontario has recently worked diligently and responsibly to improve its Permits to Take Water Program, I find it surprising that the Golf Club's application would be taken seriously in 2005. In the words of the Ontario government, we must "provide for the conservation, protection and wise use and management of Ontario's waters, because Ontario's water resources are essential to the long-term environmental, social and economic well-being of Ontario". I would challenge golf course irrigation to be a "wise use" of our precious resource.

Given today's Source Water Protection Planning initiatives it seems like a contradiction of principals to issue a water permit that would have a direct impact on aquifer recharge and base flows in a river that is struggling to support it's aquatic communities.

Many people enjoy the Jock River and the water in the river supports an impressive diversity of plants and animals. Why should a few golfers and businessmen benefit at the expense of so many? Clearly, the golf course needs to be working on water conservation initiatives and give back to the community and the river that supports its existence. In my view there is insufficient river water to satisfy the requested irrigation needs of the golf course and still maintain this highly valued river ecosystem.

Thank you for looking into this matter and I look forward to a solution that gives priority to the health of the Jock River.

Sincerely,



Meredith Brown, *Riverkeeper*