



**Ottawa Riverkeeper**  
**Sentinelles Outaouais**

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February 14, 2005

Dawn Landry, Policy Adviser  
Strategic Policy Branch  
135 St. Clair Ave. West, 11th floor  
Toronto, Ontario M4V 1P5

Dear Ms Landry:

**RE: Final Report of the Implementation Committee on Source Water Protection**

Once again, Ottawa Riverkeeper would like to commend the government of Ontario on their ambitious plans to implement Source Water Protection Plans throughout Ontario. As an organization that works with communities to protect the ecological integrity of the Ottawa River, we have a great interest in Source Water Protection Planning and would like to offer our comments on the Final Report of the Implementation Committee on Source Water Protection.

As you are well aware, there are major transboundary issues in the Ottawa River Watershed; two-thirds of the watershed is in the province of Quebec. There are over two dozen towns or cities on the Ontario side that draw drinking water from the Ottawa River, the largest being Ottawa, the nation's capital. In order to properly evaluate the risks to the surface waters of the Ottawa River, a comprehensive watershed study and analysis must be undertaken, with active participants from both provinces. In the words of your own committee, "the management of the water source will have limited success if the planning and implementation activities begin and end at jurisdictional lines".

Therefore, I believe it is imperative that a Source Protection Committee (SPC) be established for the entire Ottawa River Watershed, which is independent of the committees that are working on the sub-watersheds of the Ottawa River. There must be a committee that is looking at the watershed as a whole to determine ecological risks and cumulative impacts of the many threats that continue to pollute the Ottawa River. The SPC for the entire Ottawa Watershed would compile and analyse data collected from the sub-watershed committees as well as data from Quebec.

Ottawa Riverkeeper is interested in contributing to source water protection planning at the watershed level. We have expertise and experience to bring to the table; our Riverkeeper, Meredith Brown is trained as an environmental/water resource engineer and has been working in the field of watershed protection and restoration for over a decade. We have already begun to characterize the Ottawa River watershed and we are working on identifying the major risks to the ecological health of the river,



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which ultimately affect drinking water quality. Aside from our technical contribution, we provide an important link between this government initiative and the very people the plans are trying to protect. Involving Ottawa Riverkeeper in the process will only add legitimacy and transparency to the program. We represent members from up and down the river, on both Ontario and Quebec sides. We could provide an important liaison between the citizens of the watershed and the source protection plan. Naturally, to fully participate in this program we would require funding.

To summarize, I believe that Recommendation number four<sup>1</sup> from the Implementation Committee is not enough to ensure an adequate protection plan for the Ottawa River. We must have more than just dialogue between the committees that are working on sub-watersheds of the Ottawa; we must have an independent SPC that is analysing data for the entire watershed. The committees led by Conservation Authorities will be giving their sub-watersheds number one priority and will have little time or political will to discuss larger regional concerns with the other 14 or so sub-watersheds in the Ottawa Watershed.

I would also like to take this opportunity to remind the Ministry that an important aspect of protecting drinking water is maintaining and enhancing ecological functions within watersheds. We should take caution not to focus primarily on water chemistry, but to understand the complex interactions that take place in our river and lake ecosystems. Subsequently, I would like to recommend that in the process of identifying risks to our drinking water quality, we take a long, hard look at the natural features and ecological functions that play an important role in preserving water quality in our lakes and rivers.

In the Implementation Committee's report, there was very little discussion about monitoring. I hope that budgets are allocated to monitoring programs that will allow us to adaptively manage our drinking water sources. There is still plenty to learn so that we can ensure quality drinking water and healthy aquatic ecosystems for generations to come.

Finally, while the establishment of a Watershed Planning Branch within MOE may satisfy the Walkerton Commission's call for the establishment of a Watershed Management Branch, we are concerned that establishment of new initiatives may slow down the implementation of much needed watershed protection mechanisms in Ontario. In other words, while developing new legislation and agencies over the long

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<sup>1</sup> Recommendation 4: Source protection committees should establish ongoing communication mechanisms with neighbouring committees. Cross boundary assessment work and implementation of surface water and groundwater measures should be documented in the assessment report and in source protection plans.



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term, we also need to see the Ontario government initiate immediate, effective source water protection measures using the many regulatory tools presently at its disposal.

We hope and trust that these key points will be satisfactorily accommodated in the on-going development of the source protection plan for Ontario. Ottawa Riverkeeper supports water source protection, and we encourage the government to pass legislation that will address watershed issues despite their jurisdictional boundaries.

Yours very truly,

Meredith Brown, Riverkeeper and Executive Director  
Ottawa Riverkeeper / Les Sentinelles de la Rivière des Outaouais

cc: Hon. Stéphane Dion  
Hon. Dalton McGuinty,  
Hon. Leona Dombrowsky  
Mr. Gord Miller