

City of Peterborough Committee of Adjustment

RE: B04/07 – Part of 3800 and 3810 Water Street

This severance application arises because the Trent Rapids Power Corporation is planning a for-profit hydroelectric project and believes it requires a canal on or about the subject lands.

Many members of the community who oppose the aspect of the project that involves a large canal and a power house, myself included, see great value in low-head hydroelectric power generation. It is disingenuous and misleading for proponents of the project to dismiss those opposed to the development and opposed to the severance, as simply naïve tree huggers.

A major concern is that utilization of public resources for profit carries with it the obligation of transparency, an obligation the proponent has failed to fulfill.

Before any reasoned and informed decision can be made the full details must be disclosed in a fashion so as to allow a full and independent evaluation of the facts by the public. Trent Rapids Power Corporation has failed to fulfill that obligation.

Similarly, current federal and provincial announcements and studies need to be considered and integrated, which they have not.

A few points need to be made which are demonstrative of why the application must be denied:

1. The hydroelectric project has not been subjected to a full environmental assessment, but rather to the lesser standard of an environmental screening. The proponent has not made it clear to the public that the lesser standard has been applied to this project. For this reasons, as well as reasons stated very well by others more knowledgeable in such matters, a full environmental assessment is required prior to granting any approvals.
2. Trent Rapids Power Corporation's environmental screening, such as been made available to the public, relies in part upon data provided by Phil Niblett of Niblett Environmental Associates (NEA). The City staff comments on this application state "*The Environmental Screening Report details impacts on water quantity, aquatic features including fish and invertebrates, terrestrial environment, which includes vegetation, wildlife and hydrology, and outlines mitigation measures.*"

Although it is common knowledge that Trent University stands to gain financially from the hydroelectric project, it has not been disclosed that Mr. Niblett is a recurring contract employee of Trent University.

This creates, at minimum, the perception of a conflict of interest which detracts from the viability of the data upon which Trent Rapids Power Corporation and City Staff rely.

When public resources are utilized for profit the process must be devoid of conflict of interest, real or perceived. This standard has not been met.

3. The hydroelectric project may be in conflict with two recent federal initiatives. Trent Rapids Power Corporation must not be given permissions which might allow it to irrevocably alter the landscape (eg: build a canal and powerhouse) prior to clearly understanding how these initiative affect the lands as they now are.

One federal initiative is a private members' bill proposed on June 12 2006 to evaluate the future of the historic Trent-Severn Waterway, "one of Parks Canada's National Historic Sites, and its potential to become a premier recreational asset, a world-class destination for recreational boaters, a source of clean, renewable electrical power, a facilitator of economic opportunity and renewal in the communities along its 386 km length and a model of environmental sustainability."

A second federal initiative was announced on March 14 2006 when Prime Minister Stephen Harper pledged \$225-million in federal funds to preserve ecologically sensitive lands from development.

Both federal initiatives may preclude the Trent Rapids Power Corporations development as it now stands, including this severance.

At minimum the existence of these initiatives provide ample reason to delay any approvals. It would be an error, and premature, to move a step closer to allowing the development to take place by approving the severance in view of these initiatives and their implications.

4. The option of placing turbines in the dams would have minimal impact on the existing landscape and would produce, I am told, almost the same power. This option has been summarily dismissed by Trent Rapids Power Corporation on the basis that it is too expensive but has failed to justify that to be a viable conclusion.

All too often “too expensive” simply means “reduced profit” but profit nonetheless.

When dealing with the use of public assets for profit it is incumbent upon public guardians assure that the public benefit is not sacrificed on the altar of increased profitability for a corporation.

Neither a comprehensive Cost Benefit Analysis nor a Value Engineering Analysis of hydroelectric generation options has been performed by certified firms. In the absence of demonstrating, transparently and conclusively, that the proponent’s current option is the most viable and in the public interest, approvals for the application at hand must not be granted.

The conclusions of a comprehensive Cost Benefit Analysis and Value Engineering Analysis may very well prove that in-dam turbines to be the most viable option.

For the above stated reasons, together with submissions of other opponents, the application must be denied.

Respectfully submitted,

Ken Brown