

THE OTTAWA FIELD-NATURALISTS' CLUB

THE CANADIAN FIELD-NATURALIST

OTTAWA, ONTARIO

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5 February 1986

Clerk of the Executive Council
Room 481
Legislative Building,
Queen's Park, Toronto

Petition to Cabinet re Ontario Hydro
Transmission Line

Dear Sirs:

This letter is in reference to petitions concerning the Joint Board decision of 4 November, 1985, on the location of a 500-kv corridor through the City of Kanata. Our purpose is to oppose the petitions by the City of Kanata and the Kanata Citizens' Task Force.

The Ottawa Field-Naturalists' Club represents 1211 members of whom 821 are resident in the National Capital Region. One of the objectives of the Club is to protect significant natural areas and natural resources. Our Club has participated in the planning process for the corridor referred to, having been invited to do so at an early stage in the process.

The Stony Swamp Conservation Area is a major natural area in the National Capital Region. It is important this area be kept as large as possible. The route for the 500-kv corridor proposed by the City of Kanata would make a new encroachment on the Conservation Area by requiring the creation of a new hydro corridor and the removal of the particular vegetation in it. This would reduce the quantity and quality of that type of natural habitat available, thereby in effect reducing the size of the natural area. Each reduction in size makes the area less capable of supporting wildlife, and therefore less valuable for recreation and interpretation.

We submit that the City of Kanata and the Kanata Citizens' Task Force have failed to show adequate concern for the Stony Swamp Conservation Area. This area is now and increasingly will be valuable to the National Capital and also to the citizens of Kanata.

It should be noted that the National Capital Commission, owner of Stony Swamp, favoured Hydro's preferred route over that

proposed by Kanata, because the latter would cause more damage to the conservation area. The statements in the petitions referred to above, that Kanata's route was supported by the NCC, are therefore not correct.

The Ottawa Field-Naturalists' Club respectfully requests that either the Joint Board's chosen route or Ontario Hydro's preferred route be designated in the final decision.

Yours sincerely,



W. K. Gummer, President

IN THE MATTER OF Sections 2 and 3 of
the Consolidated Hearings Act, 1981
(S.O. 1981, c. 20)

- and -

IN THE MATTER OF Section 12(2) and (3)
of the Environmental Assessment Act
(R.S.O. 1980, c. 140)

- and -

IN THE MATTER OF Sections 6, 7 and 8 of
the Expropriations Act (R.S.O. 1980, c.
148)

- and -

IN THE MATTER OF an undertaking of
Ontario Hydro consisting of the
planning of, selection of locations
for, acquisition of property rights
for, and the design, construction,
operation and maintenance of additional
bulk electricity system facilities in
Eastern Ontario consisting of switching
and transformer stations, communica-
tions and control facilities, trans-
mission lines and related facilities

FURTHER REPLY ON BEHALF OF THE HYDRO
CONSUMERS ASSOCIATION TO THE REPLY
FILED ON BEHALF OF ONTARIO HYDRO WITH
RESPECT TO THE EASTERN ONTARIO
TRANSMISSION SYSTEM EXPANSION PROGRAM

Preamble

The following is a reply to the response made by Ontario Hydro to our petition and set out on pages 12-18 of that reply.

- i) "Motion to Retain Consultants Denied" (item i, page 12 of Ontario Hydro's Reply)

The need for an independent review of the reliability of Hydro's Transmission System Expansion Program was first raised by counsel on behalf of the HCA during the Plan Stage hearings before any decision with respect to the undertaking had been made. Further, it is inappropriate in our view to suggest that primary responsibility for identifying the need for "technical or special" assistance, reside with a citizens group rather than with the Board itself.

- ii) "Southwestern Ontario" (item ii, page 13)

It is not the similarity of undertakings but rather the identity of Board members that is the point of our petition.

- iii) The reliability of existing and proposed transmission systems (item iii, page 13).

The Royal Commission on Electrical Power Planning (RCEPP) did not hold "extensive hearings...on the need for this project [emphasis added]. Rather in charging RCEPP with its mandate, O.C. 2065-78 (appendix B of HCA petition) specifically precluded any such consideration in the following words:

"But excluding consideration of the specific nature of the additional bulk power facilities which may be required and of their locational and environmental aspects".

Thus, RCEPP did not consider a program for expanding the transmission system in Eastern Ontario, nor did it consider the design, staging or reliability of such a system.

- iv) Approval for facilities for year 1999 (item v, page 16)

The Joint Board did not conclude that soft energy path options were "at present...not viable alternatives to the undertaking". Rather, as quoted on page 6 (paragraph 7) of our petition, the Board stated that "the effect of any soft energy path option introduced at this time would not be able to meet the short-term needs for additional transmission facilities as described by Ontario Hydro" [emphasis added]. Indeed the Board specifically

recognized the advantages and desirability of employing a soft energy path strategy and indicated that "staging of facilities would allow sufficient flexibility to introduce a change in strategy as the planning period progresses".

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 6th day of February, 1986.



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Association

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