

Darlene Conway, P. Eng.
291 Duncairn Avenue
Ottawa K1Z 7H1

April 19th, 2009

Infrastructure Services and Community Sustainability
City of Ottawa
110 Laurier Avenue West, 4th Floor
Ottawa, ON K1P 1J1
Attention: Ms. Carol Christensen

Dear Carol:

Re: Carp River Restoration Plan Third Party Review

I have reviewed the Phase 1 and Phase 2 Reports of the Third Party Review (TPR) of the Carp River Restoration Plan and offer the following comments.

In my opinion, the Carp River Restoration Plan can be best characterized as a project justified by exceptions upon exceptions – and the recommendations of the Third Party Review confirm this. When there is admitted uncertainty associated with this significant, perhaps unprecedented project, it is difficult to understand how so many exceptions and such flexibility can be permitted. These exceptions include:

- i) The creation of a significant area of developable land from floodplain;
- ii) The use of an uncalibrated, unvalidated model to support this development;
- iii) The characterization of significant flood level increases on private property as minor without recognition that neither the City nor MVC has the authority to permit this;
- iv) Relaxation of Lakes and Rivers Improvement Act guidelines with respect to the calculation and comparison of pre- and post-development riparian storage;
- v) The apparent refusal to assess the impacts of a storm distribution and duration that may be more appropriate to the watershed than the short duration events chosen;
- vi) The suggestion of generating additional storage in parks when the City has been moving away from this practice for some time; and
- vii) The recommendation that measures such as rain barrels could feasibly be used to mitigate flood risk or provide more confidence in the restoration plan rather than specifying the most prudent and easily managed measures: a wider corridor and improved flow efficiency downstream.

There is much useful information in the Third Party Review documents but the issues noted above have not been adequately addressed. It is my opinion that the TPR's confirmation or acceptance of so many

exceptions is not justified given the uncertainty associated with this project and that development should not proceed before these exceptions are addressed.

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Regards,

Darlene Conway, P. Eng.