



# Dow's Lake Residents' Association

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November 7, 2021

The Honourable Steven Guilbeault  
Fontaine Building 12th floor  
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Gatineau QC K1A 0H3

***By Email:***

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Dear Minister Guilbeault,

The Dow's Lake Residents' Association (DLRA) and ReImagine Ottawa wish you well on your appointment as the Minister for the Environment and Climate Change. We reach out to you with a spirit of partnership and collaboration, with the shared goal of protecting and preserving the environment, and affecting climate change.

As you know, Ottawa is poised to use over 50 acres of federal land - central, urban green space, only a 3.6km walk from Parliament Hill, for the Ottawa Hospital's new Civic Campus.

In 2016, the NCC in partnership with the Ottawa Hospital undertook an exhaustive site review which engaged over 8000 people for the new Civic Campus. In this review, Tunney's Pasture was selected as the ideal site based on the overall impacts of developing a new hospital and the criteria put forward by the Ottawa Hospital. Shortly after the review was made public, the Dow's Lake site was chosen for the new hospital without a clear supporting rationale. The choice to use the Dow's Lake site, next to the Rideau Canal - Ontario's only UNESCO World Heritage site, is one that sacrifices a significant portion of the last remaining Experimental Farm in Canada which has been deemed to be a National Historic Site. This choice will not only have environmental ramifications. It puts into question the value of "heritage" in our country and our commitment to preserving it for future generations. And what is very clear is that these lands will be sacrificed for a new hospital when other, better options were identified, selected, and continue to be available.

Using over 50 acres of federal land and urban green space which is known to be environmentally sensitive and ecologically rich, in the heart of the nation's capital - described in Ottawa's Official Plan as "Canada's symbolic focal point," significantly places Canada's reputation as an environmental steward and partner at risk.

The Dow's Lake community stands at the sea wall of urban growth, tremendous change, and massive development – from a "village" of towers soaring as high as 190 meters or 55 storeys, to a new Civic Campus that will see 10000 staff ebb and flow each day to work,

another 10000 ancillary jobs, and 1 million hospital visitors per year – or an additional 2740 visitors each day.

The DLRA and ReImagine Ottawa fully support a new, state of the art hospital and centre of excellence. But, we are deeply concerned about the lasting and irreversible impacts the new Civic Campus will have on surrounding areas, ecosystems, and communities.

Legislation in the form of the *Impact Assessment Act* (IAA) exist to address these very issues. This legislation is a reflection of our values, who we are as a People, and the need to build a better and sustainable future for all. Environmental Impact Assessments are central to the IAA and guided by the following principles:

- Reconciliation and Partnership with Indigenous Peoples,
- Basing decisions on scientific evidence and Indigenous knowledge,
- Providing predictability, transparency, and timeliness,
- And, meaningfully engaging with the public.

**If a new hospital is to be built at Dow's Lake, in the heart of Canada's capital city, then it is absolutely imperative that we get it right – for our children, for our city, and for the future.**

#### Necessary Action

**An Independent Environmental Impact Assessment must be undertaken by the Impact Assessment Agency.**

#### Request

There is currently around the world a collective climate conscience, a concerted effort to tackle climate change, and a desire to leave a healthy planet to our children.

We know that urban green spaces are good for cities. They reduce air pollution. They keep cities cooler. They naturally manage stormwater. They keep people healthy. They keep people happy.

**The Dow's Lake Residents' Association and ReImagine Ottawa formally request, under Section 9 and Section 82 of the Impact Assessment Act, that an Independent Environmental Impact Assessment be undertaken. Specifically, we respectfully and urgently request that federal lands in the form of the Dow's Lake site for the Ottawa Hospital's new Civic campus be designated under the Impact Assessment Act.**

We believe it is imperative that this important action be undertaken in the interests of all people, the environment we share, and the future.

#### Factors supporting our request for the project's designation under the Impact Assessment Act:

1. The project is in an environmentally sensitive, ecologically and heritage rich area: the Central Experimental Farm, Dow's Lake, the Dominion Arboretum, Queen Juliana Park, and the Rideau Canal.
2. The project involves a new type of activity on this land. The hospital will be built on mainly open green space in the heart of Ottawa, and incorporated into the Preston-Carling District, a high priority target for intensification. Given the massive urban development planning for the district, this green space will be necessary to offset the growing heat island and to provide new residents living in high density environments with quality of life in terms of quiet enjoyment of open green spaces.
3. The project has the potential to cause the following adverse effects.
  - a. The Hospital's own Environmental Impact Statement clearly states that there will be a wide array of impacts on the natural environment that supports a plethora of wildlife habitats, including impacts on aquatic habitats and fish bearing waterways at Dow's Lake and the Rideau Canal, species at risk, in particular trees, and migratory birds. Central to this is the loss of at least 523 mature trees, some of which are endangered and at risk species.
  - b. According to the Hospital's Master Servicing Study, considerable stormwater will continue to drain from the hospital's Dow's Lake site directly into Dow's Lake via a 1200mm outlet. Residents are concerned about the impacts of runoff water into Dow's Lake and by extension, the Ottawa River – Ottawa's main source of drinking water. Further to this, it is unclear how run off water will affect aquatic and fish habitats.
  - c. It is unclear how anaesthetic gas emissions will be managed. These are highly destructive, ozone depleting greenhouse gases. How these gases will be managed is important in achieving Canada's emission targets and reflect our ability to meet international commitments i.e. United Nations Environmental Programme, The Montreal Protocol.
  - d. Urban green spaces help reduce air pollution, reduce urban heat islands, and reduce air pollution. Warmer cities contribute to a higher incidence of heat related illnesses. These primarily affect the elderly and those living in higher density neighbourhoods, often socioeconomically disadvantaged. A very considerable area of the 50 acre site will be taken up by the hospital structure, physical infrastructure, parking, and hardscaping.
  - e. Public Services and Procurement Canada have entered into a lease agreement with the Ottawa Hospital to lease federal lands, **unceded** Indigenous territories, to build a new Civic Campus. To be clear, the ownership of these lands under the lease remains with the Federal Government. To date, the Indigenous voice has yet to be heard.
  - f. The hospital is meant to serve the First People in the North, yet the new hospital's 4-storey, above-ground parking garage will replace Queen Juliana Park, a natural meeting place and the site of many Pow-Wows in the past.

4. The report submitted to the Planning Committee and Built Heritage Sub-Committee by the Planning Department on September 19, 2021 (Report Number: ACS2021-PIE-PS-0093) cites a past Environmental Assessment. This Assessment is **old**. It is **outdated**. It is **irrelevant**. The scope of this Assessment looked at the demolition of the Sir John Carling Building. It is not specific to the hospital project.

We reach out to you with a tone of urgency in taking action that reflects who we are as Canadians, and who we strive to be as global citizens. What we desire is to create positive and sustainable change today that will echo for generations to come.

Respectfully submitted by,

Joseph Federico  
*on behalf of the Dow's Lake Residents' Association*

[Redacted signature]

Ioana Cosma,  
*on behalf of Reimagine Ottawa*

Contact: [Redacted contact information]

REIMAGINE OTTAWA

## Supporting Facts

- *Impact Assessment Act (2019):*
  - *9 (1) The Minister may, on request or on his or her own initiative, by order, designate a physical activity that is not prescribed by regulations made under paragraph 109(b) if, in his or her opinion, either the carrying out of that physical activity may cause adverse effects within federal jurisdiction or adverse direct or incidental effects, or public concerns related to those effects warrant the designation.*
  - *82 An authority must not carry out a project on federal lands, exercise any power or perform any duty or function conferred on it under any Act of Parliament other than this Act that could permit a project to be carried out, in whole or in part, on federal lands or provide financial assistance to any person for the purpose of enabling that project to be carried out, in whole or in part, on federal lands, unless*
    - *(a) the authority determines that the carrying out of the project is not likely to cause significant adverse environmental effects; or*
    - *(b) the authority determines that the carrying out of the project is likely to cause significant adverse environmental effects and the Governor in Council decides, under subsection 90(3), that those effects are justified in the circumstances.*
- The Hospital's Environmental Impact Statement states in Section 5.1:
  - *"This report has documented the existing conditions in the vicinity the New Civic Development. Detailed impact assessments and mitigation strategies **should be developed**, if required, **at a later stage** in the project."*
  - It goes on to list impacts to trees – including endangered and threatened species, to fish habitat in waterways including Dow's Lake and the Rideau Canal – both of which empty into the Ottawa River – *the main source of our drinking water*, to wildlife habitats, natural features, vegetation, and consequently bird activity.
- The Hospital's Environmental Impact Statement is unclear. Table 3 in the May 2021 report lists felling 680 trees with a stem diameter > 10cm. Table 3 of the Revised August 2021 reports lists felling 523 trees with a stem diameter > 10cm. It remains unclear how many existing and mature trees will be cut down.
- We know that the photosynthesizing effect of trees help scrub the urban environment by storing carbon and creating oxygen. We know the tree canopy helps reduce urban temperatures. We know the developed and extensive root network of mature trees helps manage storm and melt water. Simply replacing trees that are cut is an option, but not a good one. It will take decades for new trees to have the same environmental impacts as the existing and mature trees. Planting new trees is not a quid pro quo. Felling healthy, mature trees amounts to the immediate loss of all the benefits they

provide. The time it takes for a new tree to provide the same benefits will never reconcile with the loss.

- The Hospital's Environmental Impact Statement goes on to list mitigation in the form of fencing, managing garbage during construction, refuelling off site, ensuring that construction equipment is well maintained and in good working order. These actions would be in line with good, expected, everyday practices. Respectfully, they do not constitute mitigation that is commensurate to the broad and significant environmental impacts listed in Section 5.1 of the report.
- The Hospital's Environmental Impact Statement studied an area that extends 120m beyond the actual delineated new campus location (Figure 3). This overlaps with the required 30m buffer zone required by UNESCO and the Historic Sites and Monuments Act. As these two area overlap, it is unclear if building a hospital in this location will impact on the UNESCO World Heritage status of the Rideau Canal – the only UNESCO World Heritage status in the entire Province of Ontario.
- Dr. Paul Villeneuve of Carleton University specifically looked at the impact of the Central Experimental Farm on air quality. The study states:
  - *“Results suggest that this unique urban green space has important beneficial impacts on ambient air pollution concentrations and for mitigating extreme heat events for which a large portion of Ottawa's populace is exposed.”*
- The CBC reported on Dr. Villeneuve's study. The article states:
  - *“It [Central Experimental Farm] plays important roles in terms of increasing physical activity, it's been shown to reduce mortality rates, it's been shown to be associated with lower rates of diabetes. It has a lot of health benefits, as well as the environmental benefits.”*
  - Considering what we know, what is proven, it is paradoxical to destroy 50+ acres of urban green space and disregard the positive health benefits that come with it to build a hospital to treat metabolic syndromes, heat related illness, and respiratory conditions caused by air pollution.
- We know from emerging data as recent as 2020, from *The Lancet* and *Yale University*, that the healthcare sector is a major contributor of harmful emissions.
  - *“The healthcare industry is responsible for responding to the many of the most dangerous effects of pollution and climate change, and yet it is a significant source of greenhouse gases and other deadly environmental emissions itself ... The healthcare sectors of the United States, Australia, Canada, and England combined emit an estimated 748 million metric tons of greenhouse gases each year, an output greater than the carbon emissions of all but six nations worldwide.”* - Dr. Jodi Sherman, Yale University

- *“The use of desflurane or sevoflurane from a modern anaesthetic machine for 1 h is the same as 230 or 30 miles travelled in a modern car, respectively.” - The Lancet Planetary Health*
- We know that hospitals contribute significantly to greenhouse gas emissions. Some of this is inevitable in the provision of modern health care. However, we are using a double-sided axe if we destroy 50+ acres of green space and build a new hospital.
- In 2015 the David Suzuki Foundation published *“The impact of green space on heat and air pollution in urban communities: a meta-narrative review,”* which looked at 102 peer-reviewed studies published in the preceding 5 years. That is to say, **current data**. It states:
  - *“Not surprisingly, the report found that urban green spaces — from trees and parkettes to green roofs and large natural spaces — generally provide significant health benefits for residents and the community. It also found that these ecological benefits are directly related to the size, quality and density of the green space. Why is it important to reduce urban heat effects and air pollution? It is estimated that tens of thousands of Canadians die prematurely each year due to acute air pollution and that high summer temperatures lead to increased illnesses, hospitalizations and deaths, especially among older adults.” (p.4)*
  - **Destroying green spaces contributes to higher health care costs.**
- The Hospital's Master Servicing Plan states,
  - *“The existing PSPC private underground stormwater sewer system conveys flows from the federal lands (Experimental Farm), located to the west and south of the NCD (New Civic Development), through the NCD towards Prince of Wales Drive and eventually to Dow's Lake. The overland flow from these areas is divided between Dows Lake and the major tributary drainage area for the Nepean Bay Trunk.” (p. 51) The reports goes on to describe that the performance of the Nepean Bay Trunk is very poor. This poses “**significant flooding risk** in the vicinity of the sewer during surcharge conditions.” (p. 53)*
  - **To be clear, known and predicted Environmental Impacts and Property Damage.**
- The City of Ottawa states that: “Combined Sewers collect and transport both sanitary wastewater and stormwater runoff in a single pipe. This type of collection system was typically installed from 1880 to 1960 and is still in operation in older areas of most Canadian cities ... Combined sewer overflows are generally diverted to flow into the Ottawa River.” According to information listed on the City of Ottawa's website, over 344 000 m<sup>3</sup>, or 344 million litres of combined storm and sanitary sewer water overflowed into the Ottawa River in 2020. On one day alone, October 16, 2020, over 67 million liters of combined sewage overflowed into the Ottawa River. All of these

events were caused by excessive rainfall. Using over 50 acres of urban green space combined with the massive intensification of the Preston-Carling area will only exacerbate this issue.

- The Ottawa Citizen reported in 2016 that **toxins** from the demolition of the Sir John Carling Building **leached into Dow's Lake**. This was with an Environmental Assessment. Is there a potential for further drainage of harmful, unwanted, and dangerous substances to drain into Dow's Lake and eventually into Ottawa's main source of drinking water, the Ottawa River?

Links:

The Ottawa Hospital New Civic Campus Development Documents:  
<https://devapps.ottawa.ca/en/applications/D07-12-21-0059/details>

The Montreal Protocol:  
<https://www.unep.org/ozonaction/who-we-are/about-montreal-protocol>

The Ottawa Hospital Site Review:  
<https://ncc-ccn.gc.ca/projects/the-ottawa-hospital-site-review>

[https://heritageottawa.org/sites/default/files/toh\\_recommendation\\_report\\_0.pdf](https://heritageottawa.org/sites/default/files/toh_recommendation_report_0.pdf)

City of Ottawa Stormwater data:  
<https://ottawa.ca/en/living-ottawa/water/wastewater-and-sewers/wastewater-collection-and-treatment>

References:

Charlesworth, Michael, and Frank Swinton. "Anaesthetic Gases, Climate Change, and Sustainable Practice." *The Lancet Planetary Health*, vol. 1, no. 6, Sept. 2017, pp. e216–e217, [www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(17\)30040-2/fulltext](http://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(17)30040-2/fulltext), 10.1016/s2542-5196(17)30040-2.

Cummings, Mike. "Healthcare Industry Is a Major Source of Harmful Emissions." *YaleNews*, 2 Aug. 2019, [news.yale.edu/2019/08/02/healthcare-industry-major-source-harmful-emissions](http://news.yale.edu/2019/08/02/healthcare-industry-major-source-harmful-emissions).



Impact Assessment Agency of Canada. "Impact Assessment Agency of Canada - Canada.ca."  
*Canada.ca*, 2019, [www.canada.ca/en/impact-assessment-agency.html](http://www.canada.ca/en/impact-assessment-agency.html).

NCC Federal Site Review for the New Civic Campus of the Ottawa Hospital, Nov. 2016,  
[https://heritageottawa.org/sites/default/files/toh\\_recommendation\\_report\\_0.pdf](https://heritageottawa.org/sites/default/files/toh_recommendation_report_0.pdf)

*New Civic Development for the Ottawa Hospital Environmental Impact Statement and Tree Conservation Report, Master Site Plan New Civic Development for the Ottawa Hospital Environmental Impact Statement and Tree Conservation Report Master Site Plan*. 2021.

"Ottawa's Experimental Farm Is Good for You, Study Confirms." *CBC*, 29 Sept. 2019,  
[www.cbc.ca/news/canada/ottawa/experimental-farm-good-for-you-study-1.5299465](http://www.cbc.ca/news/canada/ottawa/experimental-farm-good-for-you-study-1.5299465).

Reevely, David. "Reevely: Toxins Leaked into Dow's Lake from New Hospital Site, Feds Say."  
*Ottawacitizen*, 2016, [ottawacitizen.com/news/local-news/reevely-toxins-leaked-into-dows-lake-from-new-hospital-site-feds-say](http://ottawacitizen.com/news/local-news/reevely-toxins-leaked-into-dows-lake-from-new-hospital-site-feds-say). Accessed 21 Sept. 2021.

Van Ryswyk, Keith, et al. "Does Urban Vegetation Reduce Temperature and Air Pollution Concentrations? Findings from an Environmental Monitoring Study of the Central Experimental Farm in Ottawa, Canada." *Atmospheric Environment*, vol. 218, 1 Dec. 2019,  
[www.sciencedirect.com/science/article/abs/pii/S1352231019305163](http://www.sciencedirect.com/science/article/abs/pii/S1352231019305163),  
10.1016/j.atmosenv.2019.116886. Accessed 21 Sept. 2021.

Zupancic, Tara, et al. *The Impact of Green Space on Heat and Air Pollution in Urban Communities: A Meta-Narrative Systematic Review*. Mar. 2015.