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Construction de l'axe McConnell-Laramée  
entre l'autoroute 50  
et le chemin de la Montagne  
Hull- 6211-06-0a1



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April 24, 2001

Secrétaire du BAPE  
Hélène Marchand  
Edifice Lomer-Gouin  
575 rue, Saint-Amable,  
Bureau 210, Québec  
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By fax: (418) 643-9474

Dear Ms. Marchand,

Re: Proposed Laramée-McConnell extension

Collectively, we have serious misgivings about the aforementioned project. These misgivings are based on the following:

- (1) The Outaouais area in general, and Hull-Ottawa in particular, is fortunate to have a large (at least semi-) wilderness area right in its back-yard. This situation is virtually unique among Canadian (and indeed North-American) large metropolitan areas. Without a doubt, Gatineau Park is *the* major ecological and recreational jewel in the Outaouais area, and any project which has the potential to tarnish its lustre must be subjected to a thorough and detailed scrutiny in which the real (versus imagined) socioeconomic benefits are contrasted with the full range of likely ecological impacts, and the consequences thereof.
- (2) That the current proposal has this potential cannot be doubted. In the 1994 document "Plan de Zone Lac des Fees" by Arbour, Berthiaume et Beaugard, commissioned by the NCC, authors highlight the ecological significance of the area and anticipated impacts of the proposed extension, which, in their view, would be extensive.
- (3) The ecological significance of the southern section of the park is profound. Recent work indicates that the area provides critical habitat to a number of provincial species at risk, including swamp oak, black maple, southern flying squirrel and four-toed salamander; as well as some of the oldest and largest white pines in eastern Canada (the latter of which are in the direct path of the proposed

extension). The proposed extension will pass either directly through or in close proximity to several sensitive wetlands. In particular, the *Wolffia columbina* dominated wetland has been identified in only twenty other locations in the province, while the *Wolffia borealis* dominated wetland is known from only five other locations in Québec. Moreover, the southern end of the park is also home to the endangered or rare medicinal plants such as American ginseng, dwarf ginseng and wild leek.

- (4) In several important respects the environmental impact assessment done by the MTQ is inadequate; there are impacts, well-documented in the scientific literature, that the MTQ EA has either ignored completely, or given short shrift to despite a significant body of underlying scientific work. Space precludes an exhaustive listing of these shortcomings, but just to cite one example: recent work on the impact of adjacent land-use indicates that road development can have dramatic impacts on wetland plant and amphibian community structure (Findlay and Houlihan, 1997; Findlay and Zheng 1999; Findlay and Bourdages 2000; Findlay et al. 2001). These impacts can extend up to several kilometers from the wetland proper. Clearly, this and related research is directly relevant to assessing the impacts of the proposed extension on wetlands (e.g. the *Wolffia* complexes), but nowhere are these and other considerations addressed in the MTQ assessment.
- (5) The NCC is fond of referring to itself as the “steward” of Gatineau Park, but in this issue, it has not fulfilled its self-proclaimed stewardship mandate. As noted above, the 1994 report commissioned by the NCC concluded that the likely ecological impacts of the proposed highway would be substantial. Indeed, in an earlier report (see; MTQ PR5.2 Axe McConnell-Laramée Avis de recevabilité, Response a la 2e série de questions March 2001 p. 6-7), seven advantages were cited for an alternative route (Gamelin Blvd), and only one disadvantage. In its 1992 Sector Plan for the Gateway, the NCC itself (p. 15 in the summary), specifies the objective of “protecting sensitive areas: woodlands, swamps, Lac des Fées, peat bogs, creeks, ravines and wetlands”. Yet the NCC is still supporting the proposed extension route despite internal inconsistency on its position and the lack of an adequate environmental impact assessment. It is tempting to conclude that, with respect to this issue at least, the Commission has abrogated its stewardship responsibility,

It is our understanding that (1) the proposed project is on federal lands (Canadian Environmental Assessment Act 5(1)(c)); (2) a project of this nature is not on the CEAA exclusion list (CEAA Exclusion List Regulations SQR/99-437. Hence, an environmental assessment is required under CEAA. Although the length of the extension is insufficient to require a comprehensive assessment (Comprehensive Study List Regulations 29(b) SQR/DORS/99-439) under the Act, a screening is clearly required (CEAA 18.1). It is also our belief that the MTQ environmental assessment is inadequate insofar as it fails to provide an objective and comprehensive assessment of alternate routes, fails to

adequately justify the project, and does not capture the full range of possible and expected impacts associated with the extension.

In light of these concerns, we therefore request:

- (1) That the BAPE carefully consider the alternate route along the existing Gamelin Blvd corridor, an outcome that is likely to have considerably fewer ecological impacts than the one proposed;
- (2) A referral to a federal review panel under CEAA.

Yours sincerely,

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M. Regent Dickey, Transport Canada  
M. Leopold Gaudreau, DPEDD

### References

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