

## **Heritage Impact Analysis The Mississippi RiverWatchers Comments**

### **Preamble**

The Mississippi RiverWatchers and others requested a Part II Order of Enderdu's proposed expansion of their hydro generation station in the town of Almonte. In denying the Part II Order request, the Ministry of Environment in conjunction with the Ministry of Tourism, Culture and Sport developed a condition requiring Enerdu to complete a Heritage Impact Assessment (HIA) which is to be provided to the Ministry of Tourism, Culture and Sport for its review and comment. The HIA is to be completed before the detail design phase and will help guide the conservation of identified built heritage resources and cultural heritage landscapes.

The consultant hired to undertake the report, Julie Harris submitted a draft report that was reviewed by the Mississippi Mills Heritage Committee. There are considerable community concerns regarding the draft report. The Mississippi RiverWatchers compiled those concerns which follow.

### **1. Lack of Local Input**

Almonte has a significant number of heritage experts who have participated in the heritage restoration of Almonte. They were not consulted by the author of the report.

### **2. Continuing Evolving Landscape**

The HIA justifies all of the changes to the riverscape based on the premise of a "*continuing evolving landscape*". This concept is based on the fact that the river has undergone regular significant modification over the past 150 years with the construction of mill structures and weirs.

While the riverscape has undergone significant change, over the past decades these changes have evolved from the construction of industrial buildings to the repurposing of old industrial buildings to other non-industrial uses. The only recent significant industrial change on the river was the MRPC generator plant, located a few feet downstream, which went to great lengths to minimize the visual and noise impacts on the community.

The evolving pattern, while amenable to the project like power generation, would require the project go to significant lengths to minimize the visual impact of the project. The developer would normally work with the community to develop a structure which fit within the current riverscape. This has not happened.

### **3. Description of Work**

The new weir base is accurately described in the engineering documents provided in the Enerdu EA. Based in the weir base width, the excavation requirements for the construction of the base and the structure of the rock in the area of the weir, the changes to the upper falls will be drastic.

The HIA study minimizes the visual impact of the new weir structure. The description does not describe the impact of the new structure.

The current rock structure will be replaced by a massive concrete and steel structure which can

completely block all water flow. The heritage aspects of the falls will be completely destroyed.

#### **4. Continuation of Older Pattern**

The author justifies all of the changes proposed by Enerdu simply as a *Continuation of an Older Pattern*. “*The usage of water for power generation is well established in Almonte. Power generation will continue for the foreseeable future in our community.*”

The proposed Enerdu project breaks from the historical pattern in a significant way. All of the old mills that were and are used for power generation diverted water into their structures along the river shore. The Enerdu project does not plan to divert water to their shoreline building; they plan to construct a new building out in the river. The new structure will narrow the river by more than 30% and be separated from their current building.

No other mill structures intrude into the river in the same manner.

#### **5. Concept Drawings and Views**

Numerous concept drawings and views were used in the HIA to illustrate the impact of the new project. The drawings and views used are not consistent with the information contained in the Enerdu EA documents. Concept drawings are 2 dimensional to minimize the impact of the structures.

Photographic enhancements are not consistent with the detailed information released by Enerdu. The new weir is depicted so as to minimize the width, showing only the width of the top of the weir, not the width of the actual structure. Location of the weir is not consistent with the details provided by Enerdu. The location has been moved to minimize the visual impact in the photograph but there is no indication from Enerdu that they plan to change the proposed weir location.

Major structural items were not shown. The Ministry of Natural Resources requires the construction of a fish ladder for American Eels. This structure will be quite large and will have to be constructed in the area of the main weir. No drawing shows this structure and in fact this item is not considered by the author.

#### **6. Potential Impacts**

The potential impacts of the various aspects of the project are understated, e.g.: in the report a term “slightly reduced” is used describe a 30% reduction in the width of the river. Had the author consulted with local residents, the report would have reflected local knowledge the new structure will have on actual visual impact of the river at its narrowest point by 30% with a two story structure the height of the railway bridge. Further, the community is concerned about the potential of flooding impacts during high water volume season

In the Enerdu EA, all descriptions of cladding and appearance are qualified with the terms “where possible” or “if possible”. Enerdu has yet to make announcement about the proposed exterior cladding of the building. The HIA only makes recommendation and at the public meeting the author opened the door to Enerdu using rough concrete for the exterior.

The quote “make any intervention needed to preserve character defining elements physically and visually compatible with the historic place and identifiable on close inspection” is used to justify the construction proposed. The author states “*The proposed design, with its stone appearance is appropriate.*”

“*The powerhouse will become the most visible feature in an historic setting*”. This is very true. Unfortunately the author makes it clear that the proponent is not required to do anything to ensure that the heritage landscape is maintained. “Heritage conservation is very dependent on the willingness of private property owner”. If the owners do not care, the heritage aspects do not happen.

The visible impacts noted in Section 6.1.1 are not accurate. The powerhouse and weir structures will be grossly out of proportion to the existing heritage landscape.

The planned type of construction for the powerhouse and the Obermeyer weir are out of context and out-of-scale with the heritage aspect of the community.

## **7. New Weir Section 6.1.4**

### **Historic Weir Description**

The author has not accurately described the history of the weir adjacent to the Enerdu building. Based on old photographs it is understood that the initial weir section was built to divert water to Thoburn Mill. At a later date, a section of weir was constructed to divert water to the Wylie Mill. Still later a weir section was completed to bridge the gap between to two older weir sections.

Only after the hydro generation was installed in the Wylie Mill sometime in the early 1980s was the weir maintained. In the early 2000s the flashboards were modified to raise the water levels to increase generation capacity.

It is critical that the history of the weir construction and usage be accurate. The use of the weir was only exclusive to the Wylie Mill in the last few decades. Claim to the weir should be challenged and the right to massively change the weir should not be allowed.

### **Proposed New Weir**

The information in this section is not accurate as the existing weir has only been in place for around 100 years. Photographic evidence backs this up.

While the new weir will follow the path of the existing weir, it will in fact be located to the downstream side of the existing weir (Enerdu plans included in the EA).

While the top of the new weir will be about 1 metre wider, the base of the weir will extend 3.5 metres from the base of the existing weir. The description in this section minimizes the impact of the weir construction on the falls area.

The statement that “The rock shelf located within the boundaries of the weir will not be affected” is not correct.