

The Terrestrial Environment Technical Study Document

The Bruce Power Environmental Impact Statement is supported by a series of Technical Study Documents, referred to as TSDs. According to the forward in the Terrestrial Environment TSD, these reports comprise Bruce Power's Environmental Impact Statement (EIS) studies and address all aspects of the biophysical and human environment. It includes "all of the data, information and assessments relating to the Terrestrial Environment discipline". This report concludes by stating "**all plausible and possible direct and indirect Project-environment interactions**" relating to the terrestrial environment have now been considered.

However, this report contains contradictory assertions and uses analyses that are both deceptive and incomplete. Together, these belie this hopeful conclusion mentioned above in **bold face**. Two examples, one from each category, will serve to illustrate each set of deficiencies.

Contradictions

Figure 4.1.2.1-2 and the related narrative on page 59 provide a good example of this. Bruce Power claims here that in the Site Study Area there is no agricultural component, no managed wood lots and 99% of the industrial lands and buildings in both the Site and Local Study Areas are related to its nuclear operations.

i) Farms and wood lots

Our farm and another are in the Site Study Area. Indeed, even in this very report, two figures, Figure 5.1.1.1-1 and Figure 7.2.1.1-1 each show clearly two agricultural properties, ours and our neighbour's. Our farm, known as Farm 14 and F14 in the annual radiological surveys, has donated meat, eggs, vegetation, water and soil both to Bruce Power and to OPG for these surveys since the early 1990's and is referred to in the Radioactivity TSD.

Moreover, Figure 4.1.2.1-2 claims that in the Local Study Area, there are only 18.7 hectares devoted to agriculture. The farm properties in the Site Study Area alone total more than 18 hectares. There are the farms operated by the MacKenzie's, Young's, Campbell's, Kueppfer's, not to mention the Arda community pastures, all in the Local Study Area.

- there are farms in the Site Study Area
- the farm properties in the Site Study Area alone comprise more than 18 hectares
- in the Local Study Area, there are at least ten independent and actively managed farm properties
- there are community pastures in the local study area
- Figure 4.1.2.1-2 entirely misrepresents the agricultural component in both the Site Study Area and the Local Study Area
- this figure contradicts information that is presented elsewhere in this Technical Study Document
- there are managed wood lots in the Site Study Area

ii) Industrial lands, buildings and barrens

In the Site and Local Study Areas, there are a variety of industries, industrial buildings and industrial barrens that are unconnected with the Bruce Power nuclear site itself. These include the Bruce Energy Center, the steam pipeline, the Bruce Power and Enbridge wind farms, the Bruce Power information center, the Philosopher's Wool Co., the Bruce Municipal Telephone System and others. A simple check of the property tax records would disclose that Bruce Power's summary of economic activity here is entirely erroneous and completely overstates the nature of its dominance in the region.

- Bruce Power occupies substantially less than 99% of the industrial lands and buildings in the Site and Local Study Areas
- Bruce Power has not cross-referenced with municipal property records to confirm its facts
- there are substantial industrial barrens associated with the pipeline, wind farms and the Bruce Energy Center
- there are industrial barrens represented by abandoned gravel pits and cement yards in both the Site and Local Study Areas

iii) Deficiencies and Contradictions Noted

- this report needs to identify correctly the economic activity in the various regions
- it needs to identify the agricultural communities in the site and local study areas
- agriculture is a Valued Ecosystem Component of this Environmental Impact Statement and is consistently misrepresented in this Technical Study Document
- it must identify correctly the industrial activity in these areas
- it ignores the residential components of the site study area
- it ignores the recreational component, except for Inverhuron Provincial Park, in the site study area
- it ignores the managed wood lots in the site study area
- it contradicts itself

Inadequate and Incomplete Analyses

This Technical Study Document describes Inverhuron. On page 67, it describes Inverhuron as a natural area but states that it is not a 'significant natural area' even when it "supports regionally rare or uncommon [plant] species". Section 4.1.3.2 describes the Site Study Area and page 70 of this section describes the "Built Environment". According to this description, the 'built environment' includes the Bruce Power site and describes nothing else. It describes this environment as "either fully developed for industrial use or is a mosaic of industrial barrens".

This report merely contains **some** of the data in the Terrestrial Environment, ignoring much that is significant and important. Many of the flora and fauna that are provincially endangered or rare have simply not been recorded and no attempt appears to have been made to ensure that these reports are complete, such as by interviewing local and seasonal residents, some of whom have catalogued this

information over the years. In doing so, deficiencies created by the temporal and spatial limitations of the designed field studies would have been diminished.

Inverhuron is described as a natural area but it states that it is not a ‘significant natural area’, even when it “supports regionally rare or uncommon [plant] species”. There are two failings with this description: in the first place, it does not recognize the rare and endangered plant species that do exist within the provincial park and surrounding region; secondly, it fails to record that Inverhuron is designated as a provincially significant heritage site and has been so designated since the 1950's, when archeological diggings revealed Inverhuron’s settlement history of more than 5,000 years. Baie du Dore Wetland Complex and the Scott Point Wetland Complex, each within the Site Study Area with Inverhuron Provincial Park, have been designated as provincially significant wetlands on the basis of their biological and special features score [347] and on their total evaluation scores [26]. Both the Greenock Swamp and the Glamis Bog appear to be in the local study area and each has been designated provincial areas of scientific interest, in part because of their unique biodiversity. In addition to these environmentally sensitive locations within the Site and Local Study Areas, the Niagara Escarpment in the Bruce Peninsula has been recognized as a world heritage site by the United Nations.

One would expect of an Environmental Impact Statement located in such an environmentally sensitive region of the world, and one would especially hope that a Technical Study Document detailing the Terrestrial Environment within this region, that it would take care to represent the region and its constituent elements carefully. This report, however, fails even to note or catalogue correctly the significant flora and fauna of this region, much less the region’s importance to people for more than 5,000 years.

- the community of Inverhuron needs to be described
- its archeological history, which is referenced, needs to be described
- the flora and fauna need to be properly described
- the biodiversity of this region needs to be described
- mushrooms, a Valued Ecosystem Component of the Radioactivity TSD, need to be identified and described
- baseline data for mushrooms, flora and fauna need to be identified
- historical data for the above species need to be described

Conclusion

This report begins the process of identifying the flora, fauna, economic activity and social history of Inverhuron. It needs to be completed as the essential part of this Environmental Impact Statement that it claims to be when it states: “**all plausible and possible direct and indirect Project-environment interactions**” relating to the terrestrial environment have now been considered.