

Regional Assessment of the St. Lawrence River Area  
Impact Assessment Agency of Canada  
160 Elgin St., 22nd floor  
Ottawa, Ontario K1A 0H3

March 28, 2025

RE: Regional Assessment of the St. Lawrence River Area Terms Of Reference – Draft for Discussion

Founded in 2001, Ottawa Riverkeeper is a charitable organization working at the watershed scale for protection of the ecological health and future of the Ottawa River. Our mission is to inspire cooperative action focused toward a healthy watershed for all generations and all species. Ottawa Riverkeeper is a champion and voice for the Ottawa River watershed.

Ottawa Riverkeeper strongly supports the request for a regional assessment of an area of the St. Lawrence River by the Mohawk Council of Kahnawà:ke (MCK). The draft terms of reference for this regional assessment describe a number of objectives that aim to provide a comprehensive picture of the potential threats to the St. Lawrence watershed, including that of cumulative impacts in the region. It would be a great benefit if this Regional Assessment enables more effective and efficient future project assessments and supports other decision-making processes.

However, for this regional assessment to be able to achieve its intended objectives, Ottawa Riverkeeper strongly recommends that the impact of the Ottawa River be included in this assessment. As the largest tributary to the St. Lawrence River, the Ottawa River is an integral part of this watershed, particularly for the communities of Kahnawà:ke and Kanesatake, which are located close to the confluence of the Ottawa River with the St. Lawrence River.

The Ottawa River has a tremendously influential impact on the St. Lawrence River. This is particularly true during the spring, such that the Ottawa River Regulation Planning Board (ORRPB) was established in 1983 by the governments of Canada, Québec, and Ontario to reduce the impacts of floods along the Ottawa River all the way to the Montreal Region. However, it is not only the formidable flow of the Ottawa River that merits its inclusion.

Ottawa Riverkeeper has been working to better understand the health of the Ottawa River, and, as a result, the impact this river has on communities downstream. A recent study completed by Ottawa Riverkeeper found that the total phosphorus loading of the Ottawa River into the St.

Lawrence was almost equivalent to that calculated on the St. Lawrence at the Beauharnois. As shown in Table 1, our analysis found that the location at Beauharnois contributed a slightly higher concentration of phosphorus than the Ottawa River, despite its larger annual flow. Figure 1 illustrates the variation of the flow (discharge) and total phosphorus data throughout a year for the Ottawa River at Carillon. Another study unique to the Ottawa River Watershed uncovered that mercury levels in fish consumption guidelines in the Ottawa River watershed are higher than in fish found in Lake Ontario and Lac St. Jean but had not been examined at a watershed scale.

Table 1. Data collected and calculated for the Ottawa River and St. Lawrence River.

Station	Drainage Area (km <sup>2</sup> )	Avg. flow (m <sup>3</sup> /s)	Avg. TP (mg/L)	TP Loading (ton/yr)	TP Export (kg/ha/yr)
Ottawa River at Carillon	143,600	2,240	0.018	1,400	0.097
St Lawrence River at Beauharnois	772,000	7,560	0.006	1,530	0.017
St Lawrence River above Quebec City	1,000,000	13,280	0.022	9,640	0.096

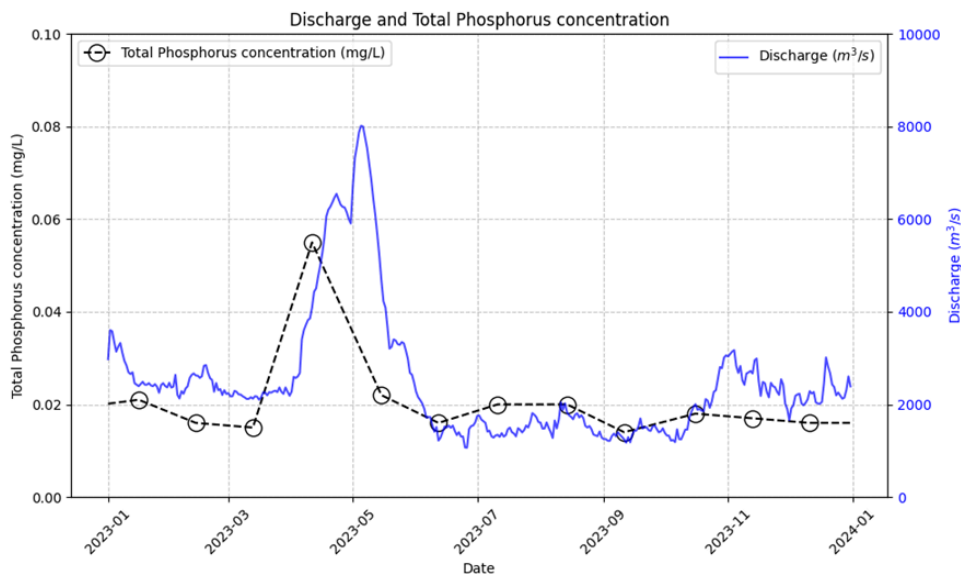


Figure 1. Discharge and total phosphorus concentration for the Ottawa River at Carillon in 2023.



Despite the impact the Ottawa River has on the St. Lawrence, it is often ignored due to its complex political jurisdictions. Cooperation is needed for proper water management, and the Ottawa River - with the provincial boundary between Ontario and Quebec running much of its length, comprising over 300 municipalities, and coursing through the National Capital Region - is one such complicated jurisdiction. As an example, the image below was originally taken from Environment and Climate Change Canada to indicate Freshwater Ecosystem Initiatives (FEI), and we have indicated on the image where the Ottawa River watershed - a sub-watershed of the St. Lawrence watershed - has been distinctly excluded from the FEI designation. Regardless of how political lines are drawn, water will flow through its watershed and so the natural boundaries of watersheds cannot simply be erased out.

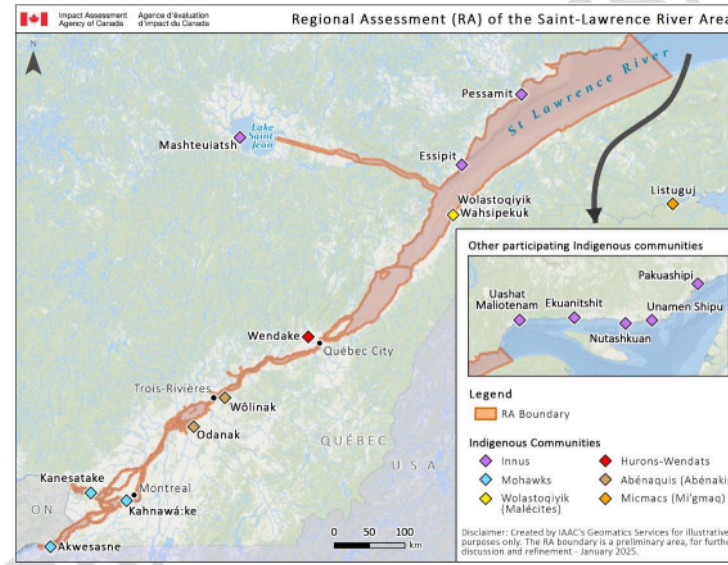
## FRESHWATER ECOSYSTEM INITIATIVES RESPOND TO REGIONAL CHALLENGES TO WATER QUALITY AND FRESHWATER ECOSYSTEM HEALTH



Excluding the Ottawa River from the broader discussion and consideration of the St. Lawrence River also excludes the Algonquin Anishinabe Nation as the Kichi Sipi (Ottawa River) watershed is their unceded, unsurrendered land. Their voices must also be included in the Regional Assessment, should they wish to participate.



Ottawa RIVERKEEPER®  
GARDE-RIVIÈRE des Outaouais



In conclusion, we strongly support the request for a regional assessment and implore you to consult with and include the rights holders and stakeholders of the Ottawa River system as a reflection of the critical impact of the St. Lawrence's single largest tributary.

Sincerely,

Laura Reinsborough  
Riverkeeper & CEO  
Ottawa Riverkeeper  
(613) 321-1120 ext. 2