

**SUMMARY:** We have read the Draft Detailed Impact Analysis (DIA) for the Never Forgotten National Memorial CBHNP (NFNMC). Overall the DIA is generally comprehensive, but seriously lacking on details on how large scale impacts from the project, on the environment – or the environment on the project - will be mitigated. Therefore it is very difficult to make comments. It is assumed that regulators will require detailed engineering reports on design of mitigation measures prior to authorizing approval to proceed. Our final comments will await review of those documents.

**PHASES OF WORK:** The DIA indicates this report only addresses Phase 1 of 5 Phases (Section 1.1). The rationale is that funding is not available at the present time for the other phases of work. Yet any detailed Provincial EIA for private sector clients requires a full assessment of all stages of work over the entire length of the project. There may, for example be a requirement for more facilities at this site requiring water and power, which may not be available and/or require inordinate costs for transmission, treatment, storage and/or management. These potential cost escalations should be addressed, before a rock or sod is turned.

**WATER AND WASTEWATER:** Our experience in the Ingonish – Neil’s Harbour area indicates serious difficulties will be encountered if trying to secure a potable water supply for the site. Either little or no water can be expected from wells in this area, or they could have elevated uranium, radon and other radionuclide concentrations. Planned future phases of the development (as stated on page 8) will definitely require washrooms (running water). This project should ensure the availability of a water supply before it begins construction – a wise and long standing recommendation by the Provincial (NS) government, and one that if not followed can cause the proponent great expense and environmental ramifications.

Note: Why do composting toilets need to be pumped out? We thought compost toilets generated compost (solid material) not pumpable liquids. If pump outs are anticipated, the DIA likely means a pit type / vault privy. Older visitors may be adverse to these washroom facilities. Has anyone done a survey regarding their acceptability to the travelling public?

**OPERATION/MAINTENANCE:** The DIA indicates that the “Foundation”, which is the proponent, is a “Not for Profit” organization. There is no indication of where and how funding will be obtained to support annual operations and maintenance. Will they solicit the general public, municipalities and / or, provincial departments? If the necessary monies cannot be raised does that imply the tax payers through Parks Canada will be required to support the venture?

Page 16 Section 2.3.2 indicates the NFNMC will operate primarily from April through November. Our experience is that there isn’t an operating washroom anywhere around the park or a decent place to eat on the May long weekend, and everything closes by Thanksgiving (early to mid-October). So although staff numbers may not increase because of the statue, it would ensure that employment contracts are of longer duration – that would be a project plus. Otherwise people visiting the area in these present non- functioning shoulder seasons will be bringing their own lunches and unfortunately using the bushes! By November 11<sup>th</sup> nothing will definitely be open!

It seems there should be more collaborative thought / action between the project proponents and Parks Canada regarding employment and scheduling especially considering the recent staff and operational hours cut-back being experienced by Parks Canada

**BONDING:** Some EIA's include a regulatory requirement for the proponent to post a bond to be held by the government in case of bankruptcy, or in this case, if the inability to raise necessary funding, limits the ability to pay for reclamation. This project is a perfect candidate for bonding requirements, yet there is no discussion in the DIA.

**VALUED ECOSYSTEM COMPONENTS:**

**Cabot Trail:** The Cabot Trail is not specifically mentioned as a VEC. There is no discussion of impacts due to traffic hazards along the Cabot Trail in the vicinity of this site e.g. will traffic routing require the construction of acceleration and deceleration lanes and removal of vegetation to create improved sight lines at the turnoff to the facility?

**Lighting:** There is no discussion of whether night time lighting will be employed during operations and/or whether aircraft warning lighting will be required at night time. We consider the dark, night sky in that area, a valued ecosystem component.

**OFF-SITE IMPACTS:** There is no discussion of where the statue will be fabricated off site, where will aggregate and concrete come from (permitted or new pits?), CO<sub>2</sub> footprint created by the use of concrete etc. Other proposals we have worked on that include some component of Federal assistance (financing, property and /or other infrastructure) usually require a detailed assessment of carbon emissions during the construction phase and/or life of the project. This issue is not addressed in the DIA.

**RADIOACTIVITY:** Parts of the Black Brook Granitic Suite are known for elevated uranium concentrations. There is no discussion of this concept regarding the potential for radioactivity/radon gas in a future water supply and /or enclosed facilities.

**IMPACT OF THE ENVIRONMENT ON THE PROJECT:** There is only minimal discussion of the impact of the environment on the project e.g.

- 1) When maintenance is required due to de-icing during the winter (when staff are not present), how that will be accomplished? What chemicals will be utilized and what will their impact be on the marine and terrestrial environments? Similarly, more frequent cleaning maybe required to remove bird offal, salt deposits from sea spray, vandalism etc. during the tourist season. How will that be accomplished?
- 2) Regarding tsunamis the text indicates some sort of emergency response to warn people. However, we are not aware of a tsunamis warning system in eastern Canada. It should be noted that in the 1920's a 7 m high tsunamis wave was recorded coming into Sydney Harbour. Such a wave would likely do considerable damage to the structure and associated infrastructure at the site.
- 3) Regarding sea level rise, the text indicates a potential for 0.9 to 1.6 m rise out to 2100. However that does not account for:

**COMMENTS - Draft Detailed Impact Analysis: Never Forgotten National Memorial,  
Cape Breton Highlands National Park  
Fred Baechler, M.Sc. and Lynn Baechler, M.Sc. (Hydrogeologists)  
June 4, 2015**

- Natural sea level rise along Nova Scotia's coast of 0.3 m/100 years (includes isostatic and eustatic changes),
- The best available information indicates storm surges of 3.6 m presently occurs one in 40 years. This is projected to be one per year by 2100 with values in excess of 4 m, one in 10 years. However, with a projected life of the project of 75 years, the statue will be removed anyway – this may therefore, be a moot point.
- Wave heights on top of storm surge,
- Potential rapid sea level rise (up to 5 m) due to melting of the Greenland and/or select Antarctic ice sheets. Rapid melting could have serious ramifications for a facility positioned at the edge of the sea coast at such low elevations. There is no discussion of these matters. It seems a little unusual that as society is beginning to learn to adapt to a changing climate, an expensive, non-essential project such as this would be proposed along a submerging coastline.

**ALTERNATE SITES:** There is no discussion of Sydney Harbour as an alternate site. Sydney Harbour was the site where troops were marshalled before leaving for Europe. The harbour had serious war time fortifications and has a rich military history. Coal and steel came from this area to support the war effort. If the most eastern site in North America is preferred as the site of the memorial statue, then perhaps Baline would be a great site. It's remote like the CBHNP site but would not be putting Parks Canada in a conflict of interest position where it is supposed to be protecting rather than compromising the natural environment.

**GENERAL COMMENTS:** Through the years we have been on the receiving end of public outcries against development projects. This is the first time we have found ourselves on the 'other side' of the issue. However, we take our stand on both the importance and sustainability of an accessible water supply and waste disposal plan and also on the "overstatement" qualities of this project. We believe most Canadians do not need or even want such a garish project in such a beautiful natural environment.

Reading the DIA we could not believe the labels applied to pieces of the project: Procession Pathway Bridge, Commemorative Ring of True Patriot Love, With Glowing Hearts Sanctuary, and We See Thee Rise Observation Deck. It seemed so "tacky" or maybe the bold American way, but definitely not soulfully Canadian. My 90 year old mother was equally appalled at these labels and at the project as well!

Surely there are better ways for well-meaning folks to spend their money. We already have the most beautiful war memorial in the world – 'The Tomb of the Unknown Soldier' in Ottawa; a classic and meaningful piece of art, for which all Canadians can be proud.