



**Written submission from  
Lake Huron Centre for Coastal  
Conservation**

**Mémoire de  
Lake Huron Centre for Coastal  
Conservation**

In the Matter of

À l'égard de

**Bruce Power Inc. – Bruce A and B  
Nuclear Generating Station**

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**Bruce Power Inc. - Centrale nucléaire de  
Bruce A et Bruce B**

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Request for a ten-year renewal of its Nuclear  
Power Reactor Operating Licence for the  
Bruce A and B Nuclear Generating Station

Demande de renouvellement, pour une période  
de dix ans, de son permis d'exploitation d'un  
réacteur nucléaire de puissance à la centrale  
nucléaire de Bruce A et Bruce B

**Commission Public Hearing – Part 2**

**Audience publique de la Commission –  
Partie 2**

**May 28-31, 2018**

**28-31 mai 2018**





**The Lake Huron Centre for Coastal Conservation**

April 11, 2018

Canadian Nuclear Safety Commission (CNSC)  
Senior Tribunal Officer, Secretariat  
280 Slater Street, P.O. Box 1046, Station B  
Ottawa, ON K1P 5S9

Re: Nuclear Power Reactor Operating Licence for the Bruce Nuclear Generation Stations (NGS) A and B

Dear Commission Secretariat,

The Lake Huron Centre for Coastal Conservation (LHCCC) requests the opportunity to submit a written intervention regarding Bruce Power's application to renew its Nuclear Power Reactor Operating Licence for the Bruce Nuclear Generation Stations (NGS) A and B for a period of 10 years in the Municipality of Kincardine, Ontario.

The Lake Huron Centre for Coastal Conservation (LHCCC) is a non-government charitable organization (charitable number 872138938 RR0001) established in 1998 with the goals of protecting and restoring Lake Huron's coastal environment, and supporting a healthy coastal ecosystem through education, restoration, and research projects. We are the only grassroots organization focused on protecting the Lake Huron coastal environment lake-wide. We currently implement several programs, including Butt Free Beach, Coast Watchers, Shoreline Cleanups, and we are developing a Coastal Action Plan for the southeastern shoreline. We also have projects managing invasive species, and restoring coastal wetlands and sand dunes. Outside of our projects we deliver many presentations to youth groups, municipalities, and cottagers' associations, and have developed an extensive library of coastal educational materials over the past 20 years. The LHCCC has been formally recognized for its work in the environmental sector. In 2004, it was awarded the State of the Lakes Ecosystem Conference (SOLEC) Award of Excellence by the Consuls General of Canada and United States and, in 2013, was awarded the Ontario Minister of the Environment's Award of Excellence for its role in coastal education and stewardship.

Our organization has been fortunate to have developed an excellent working relationship with Bruce Power. Bruce Power has shown great interest in the work of the LHCCC and has been a major supporter for several of our initiatives. Notably, Bruce Power has been the major sponsor of the LHCCC's biennial conference called '*Is the Coast Clear?*' which has become one of the primary environmental conferences held in the Great Lakes region, attracting hundreds of participants to each event over the past 20 years. This conference provides a forum for the general public and environmental professionals to learn about issues affecting Lake Huron's coastal environment, promoting greater community engagement. Experts from the Great Lakes region speak about coastal research, along with local actions and solutions to environmental challenges. A diverse audience

of all ages, including cottagers, farmers, municipal staff, elected officials, public agencies, industry, and NGOs have the opportunity to network and broaden their awareness of water quality issues. Along with providing critical sponsorship, Bruce Power staff have participated in the conferences by moderating sessions, introducing keynote speakers, and attending as delegates.

The LHCCC endeavors to create volunteer programs that help protect coastal ecosystems and educate those involved in coastal stewardship. The LHCCC has created a volunteer program called *Coast Watchers* that engages people in citizen science. Coast Watchers is designed to enlist members of the community to take an active part in monitoring the conditions of the coast. Bruce Power has been a strong supporter of the program for the past 3 years, providing funding for the volunteer kits, training sessions, and a volunteer coordinator. With over 100 Coast Watchers volunteers collecting information methodically and consistently along the lakeshore, it makes it possible to track lake conditions and trends. This enables us to see when environmental problems arise so that solutions can be found, involving the lakeshore community in the scientific and management process.

In 2017 the LHCCC initiated a project with the objective of creating educational products and spreading awareness about Lake Huron turtle Species at Risk. The Lake Huron coastline is home to 6 turtle species that are currently listed as Species at Risk. Bruce Power is located on the shores of Lake Huron in the Baie Du Dore area, a coastal wetland which provides habitat for some of these species. Bruce Power took an interest in this new initiative, providing funding for the creation of an educational booklet, the development of a series of educational videos on coastal wetlands and turtles, and a free community workshop that provided participants the opportunity to interact with live native turtles. In addition to the financial support, Bruce Power allowed LHCCC staff to conduct filming in the coastal wetlands on the Bruce Power site and provided in-kind staff support for the initiative.

The LHCCC is currently taking on the large task of creating a Coastal Action Plan for the southeastern shoreline of Lake Huron. This involves tying together the work being done on the Lake Huron shores, assessing the coastal biodiversity features, along with the potential threats and stressors to these unique ecosystems. Part of this project involves hosting an annual Lake Huron Municipal Forum. All of the shoreline municipalities between Sarnia and Tobermory are invited to the Forum, which provides mayors, council members, and municipal staff with the opportunity to explore common issues along the coast, learn about the risks that may affect their municipality, and discuss ways to work together to share resources and create effective Lake Huron coastal management. Bruce Power provided significant funding for the 1<sup>st</sup> and 2<sup>nd</sup> Municipal Forums held in 2016 and 2017 and some of their staff attended the Forum as delegates.

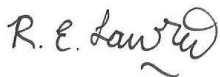
Each year the Lake Huron Centre for Coastal Conservation holds many shoreline cleanups, working with volunteers to remove trash from our beaches. In 2017 Bruce Power financially supported the Kincardine Coastal Cleanup, which attracted over 130 volunteers, removing 68kg of garbage from Station Beach. This garbage included a large quantity of micro-plastics, which are harmful to aquatic ecosystems and wildlife. Bruce Power not only financially supported this event, they advertised the cleanup internally and dozens of Bruce Power employees attended to assist with the volunteer efforts.

Bruce Power has also partnered with the LHCCC on its own corporate environmental initiatives, such as the Earth Week Eco Mentors program. The LHCCC has been involved with this program for the past several years, which educates hundreds of elementary school students each year at a number of local schools about biodiversity, waste management, water conservation, and Great Lakes ecosystems. The LHCCC has also been invited to take part in delivering environmental programs at Bruce Power's *'Take Your Kids to Work Day'*. This event provides educational activities for Grade 9 students and helps the students to learn about the variety of

environmental career options that are available to them. Both of these important initiatives are designed to have several hands-on demonstrations that give each student the opportunity to take part.

Without the strong partnership developed with Bruce Power, many of the important initiatives discussed in this letter would not be able to take place. We at the LHCCC are impressed with Bruce Power's commitment to safety, community improvement, transparent communication, and the environment. We value the contributions Bruce Power makes to grassroots environmental initiatives that our organization, and many other organizations like ours are working on, to make long-lasting improvements to the coast of Lake Huron. We look forward to continuing to build our excellent working relationship with Bruce Power in the future and we are pleased to support their licence renewal application. If you have any questions regarding these comments please contact the LHCCC at 226-421-3029 or [erinn.lawrie@lakehuron.ca](mailto:erinn.lawrie@lakehuron.ca).

Sincerely,



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