



Oral presentation

Exposé oral

**Written submission from the
Saint John Naturalists' Club Inc.**

**Mémoire du
Saint John Naturalists' Club Inc.**

In the Matter of the

À l'égard de la

**New Brunswick Power Corporation,
Point Lepreau Nuclear Generating Station**

**Société d'Énergie du Nouveau-Brunswick,
centrale nucléaire de Point Lepreau**

Application for the renewal of NB Power's
licence for the Point Lepreau Nuclear
Generating Station

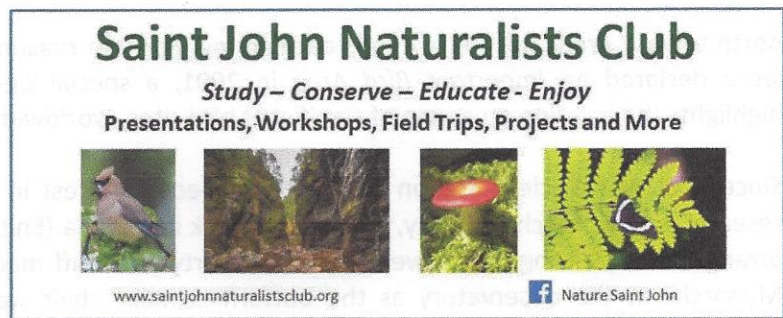
Demande de renouvellement du permis
d'Énergie NB pour la centrale nucléaire de
Point Lepreau

**Commission Public Hearing
Part 2**

**Audience publique de la Commission
Partie 2**

May 11 and 12, 2022

11 et 12 mai 2022



March 22, 2022

Senior Tribunal Officer, Commission Registry, Canadian Nuclear Safety Commission
Ottawa, Ontario

Submitted by Email: interventions@cnsccsn.gc.ca

Subject: NB Power - Point Lepreau Nuclear Generating Station – Licence Renewal 2022

Senior Tribunal Officer:

I'm writing this as a letter of support for the renewal of the power reactor operating licence for the Point Lepreau Nuclear Generating Station and as a request for the undersigned to intervene on behalf of the Saint John Naturalists' Club by a written submission and also an oral presentation during the hearing scheduled for May 11 and 12, 2022 in Saint John, New Brunswick.

My oral presentation will outline the positive longstanding relationship our Club has maintained with NB Power and the Point Lepreau Nuclear Generating Station for more than 25 years and will highlight key points from our written submission.

The Saint John Naturalists' Club has maintained a bird observatory at the tip of Point Lepreau since 1995 and regularly hosts a number of its members, other naturalists and certain members of the general public who voluntarily help with seabird migration research during several weeks each spring and with research on Monarch butterflies each fall.

Management and staff at the Point Lepreau Nuclear Generating Station assisted our Club with establishing the observatory in 1995. Since then they have been extremely cooperative by arranging security clearance for more than 250 volunteers and with scheduling visits by some of those volunteers on a daily basis during the spring and fall research periods.

This ongoing relationship is important to our Club's continuing research work. The seabird data is used by the Canadian Wildlife Service of Environment Canada for the management of East Coast seabird populations and the Monarch data by the University of Kansas's Department of Entomology.

The Point Lepreau Bird Observatory is one of only two comparable seabird observatories on the East Coast of North America; the other is located in Avalon, New Jersey and is operated by the New Jersey Audubon Society.

Point Lepreau is a geographically strategic research location for seabird migration monitoring and continued access is essential to our research work. It is quite possible that the majority of the East Coast's seabirds wintering south of New Brunswick pass within sight of Point Lepreau as they follow the coast

north toward Arctic nesting grounds each spring. For that reason Point Lepreau and adjacent Maces Bay were declared an *Important Bird Area* in 2001, a special designation by Birdlife International that highlights the location on a map of significant bird sites, worldwide.

Since 2006 the Nuclear Station has taken a special interest in a project of our Club to conserve and research the Monarch butterfly, a Species at Risk in Canada (Endangered). Nuclear site management has arranged the planting of milkweed on its property and staff members have assisted with the tagging of Monarchs at the observatory as the butterflies make their way south to Mexico during August and September each year.

The data on migrating Monarchs is shared with Monarch Watch, a research project at the University of Kansas dedicated to the protection and preservation of the Monarch butterfly.

Our Club's Monarch butterfly tagging project is one of only a handful of these efforts in New Brunswick and two butterflies tagged in the summer of 2012 were recovered at the El Rosario Monarch sanctuary in south-central Mexico the following winter. The two butterflies had each flown an estimated 4,251 kilometers (2,642 miles) from Point Lepreau!

Point Lepreau may be the most important migration stopover site for migrating Monarchs in all of New Brunswick. Its coastal location funnels the travelling butterflies out to the tip of the Point where several hectares of undisturbed wildflowers are in full bloom during late August and much of September, the exact time the butterflies need flower nectar for energy during their long migration southward. Once there, the butterflies stop, feed and replenish their body resources before continuing their southward migration. Nuclear management is aware of the importance of the blooming plants to the migrating Monarchs and ensures the flowers are not mown or disturbed.

Another reason why the observatory site at the tip of Point Lepreau is so special is that it is protected from vandalism which is a potential problem with structures located in other areas that are accessible to the public. Unlike any other bird observatory that we know of in North America, the Point Lepreau location has access that is restricted to only security-cleared individuals, the area is constantly monitored by security cameras and NB Power security staff patrol the site regularly. In addition, the single access road is plowed all winter, enabling security staff and naturalists to access by vehicle year-round, if and when necessary.

Please consider this letter as our written submission to the hearing. I look forward to the opportunity to also make an oral presentation on May 11th or 12th.

Sincerely,



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Cc: Ray Riddell – President, SJNC; Kathleen Duguay – NB Power