



March 20, 2009

Jane Stewart
Programs Coordinator
Canadian Council of Ministers of the Environment
360 - 123 Main Street
Winnipeg, Manitoba
R3C 1A3

RE: Comments in response to the “One Project-One Assessment Approach to Environmental Assessment” and “Regional Strategic Environmental Assessment” papers

Dear Ms. Stewart,

Conservation Authorities are local watershed management agencies mandated to ensure the conservation, restoration and responsible management of Ontario’s water, land and natural habitats through programs that balance human, environmental and economic needs. In 2002 an Ontario Order in Council was signed, approving the Class Environmental Assessment (Class EA) for Remedial Flood and Erosion Control Projects, under the *Environmental Assessment Act*, which establishes a planning and approval process for a variety of remedial flood and erosion control projects that may be carried out by Conservation Authorities. Within their watersheds Conservation Authorities provide great sources of knowledge and capacity with respect to the federal and provincial environmental protection and environmental assessment (EA) regimes.

Conservation Ontario, which represents the common interests of Ontario’s 36 Conservation Authorities, wishes to commend the Canadian Council of Ministers of the Environment (CCME) for establishing a task group to identify, evaluate and recommend options to streamline EAs for projects subject to provincial/territorial and federal environmental assessments, and for the opportunity to provide input on the options put forward. We agree with the challenges of the federal EA system that are outlined in the papers; the lack of coordination between federal departments, which are often triggers in our Class EA process, often causes lengthy delays.

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The following comments are being submitted for your consideration, based upon a review of the “One Project-One Assessment Approach to Environmental Assessment” and “Regional Strategic Environmental Assessment” papers by staff from Conservation Halton, Lake Simcoe Region Conservation Authority, Toronto and Region Conservation Authority and Conservation Ontario.

“Potential Models for a One Project-One Environmental Assessment Approach: Discussion Paper for Public Consultation”, prepared by the One Project-One Assessment Sub-group of the CCME Environmental Assessment Task Group, dated January 2009

Conservation Ontario is supportive of any efforts made to simplify the EA process where federal and provincial jurisdictions overlap.

We do not have a particular preference for the model that is used to achieve this aim, provided that the key principles of the EA process (including consultation, consideration of a range of alternatives, identification and consideration of effects of each alternative, a systematic evaluation of alternatives and clear documentation and transparency) are maintained. However, of the four models presented, the substitution model appears to be the most streamlined approach. The inclusion of case examples to support each model, illustrating how it would work in action, would be helpful to assessing these models further.

The paper should state very clearly what would trigger an EA. For example, Fisheries and Oceans Canada’s harmful alteration, disruption or destruction (HADD) of fish habitat authorization process is quite a different trigger compared to a municipal road widening.

We are supportive of the recommendations put forth in Section 7 (Proposed Task Group Recommendations), including the proposed roles for the lead and non-lead parties.

“Regional Strategic Environmental Assessment (R-SEA) in Canada: Principles and Guidance”, prepared by Aura Environmental Research and Consulting Ltd. For CCME, dated November 21, 2008

We support the intent to establish a common R-SEA process that does not add an additional layer of environmental assessment, but rather integrates the silos and current understanding and knowledge of regional, cumulative and strategic environmental assessment in a consolidated framework. We agree that the assessment of cumulative environmental effects should be fully integrated into the assessment and decision-support process. We are also supportive of an environmental assessment approach that encompasses a broader geographic region in order to make more strategic decisions regarding policies, plans and preferred directions for the area.

We are concerned that the R-SEA process may create an additional level of study and approval, where there is currently a process that achieves the same aims successfully.

We wish to seek clarification on when the R-SEA process would be applied and how this process would differ from Master Plans as established through Municipal Class EAs, or from Watershed Studies and Subwatershed Studies as prepared through the planning process. The report should clarify whether areas that have undergone a Master Plan/Watershed Study/Subwatershed Study would be exempt from the R-SEA process, and if they are not, discuss how the R-SEA process would be applied without being redundant. The report should also clearly state who would initiate and conduct the R-SEA (e.g. federal, provincial/territorial, upper-tier municipality, etc.).

Thank you once again for the opportunity to provide input into the identification, evaluation, and recommendation of options to address issues associated with the completion of provincial/territorial and federal EAs in Canada. If you have any questions regarding the above comments please contact myself at (905) 895-0716 ext. 231, or Natasha Leahy at ext. 228.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Pearson', written in a cursive style.

Don Pearson
General Manager

c.c. Conservation Ontario Class EA Contacts