



Greenspace Alliance of Canada's Capital  
Alliance pour les espaces verts de la capitale du Canada

Postal address: P.O. Box 55085, 240 Sparks Street, Ottawa, Ontario K1P 1A1  
E-mail: [contact@greenspace-alliance.ca](mailto:contact@greenspace-alliance.ca) □ Web site: [www.greenspace-alliance.ca](http://www.greenspace-alliance.ca)

☎: (613) 513-8362

December 22, 2016

Johanne Gélinais,  
Expert Panel Chair,  
EA Review Panel,  
Review of Federal Environmental Assessment Processes  
c/o Canadian Environmental Assessment Agency  
22nd Floor, Place Bell  
160 Elgin Street  
Ottawa ON K1A 0H3

Dear Ms. Gélinais,

On November 8, 2016, one of our members (David McNicoll) was able to attend the afternoon public presentations to the Expert Panel and then to benefit from participating in the evening Public Workshop Session. As such, we can broadly support the submissions of such groups as the Canadian Environmental Law Association, the West Coast Environmental Law and Mining Watch calling for a more robust Environmental Assessment process.

In terms of our specific context, our interest in federal environmental assessment issues stems from the fact that the largest landowner of greenspace in Canada's Capital region is the federal government, acting through a crown corporation, the National Capital Commission (NCC). Although the NCC operates theoretically in the public interest, as a landowner, it is still a proponent. The NCC is under constant pressure to deliver greenspace to the City of Ottawa for simple road expansion and other projects under Ottawa's Official Plan. This is where environmental assessment comes in. The NCC Greenspace plan is based on its corporate holdings, not on ecological functions as such. In our view EA should proceed along ecological functions, not a given land holding.

Environmental assessment along ecological lines with clearly defined criteria should be an automatic obligation of any major project, with the proponent required to submit such EAs to the proper authority. Citizens should have the opportunity to review these EAs and participate in the evaluation, or ask for a public hearing as is possible in Québec with le Bureau des audiences publiques en environnement (BAPE). The Canadian Environmental Assessment Agency could play this role nationally. The EAA currently covers projects on federal lands and projects in which the federal government is involved, but there should more space made for the public to participate, especially in our region where anything the NCC does has an environmental and social impact.

If an environmental assessment consists simply of short-term data assembled to support a proponent (for example, the EA for Ottawa's Airport Parkway Expansion) then it is little more than a land delivery

system, unmoored from the larger environmental realities in which the project exists. True strategic environmental assessment needs to be rooted in ongoing time series data that track the complex flow of appropriate ecological goods and services on which the sustainability of human communities depends and which make possible the assessment of the potential disruption of these flows brought about by the proponent's project. Data over time at least carries the hope that we might actually be assessing the environment.

For example, the City of Ottawa, with the support of the provincial and federal governments, now has what it terms an *Ottawa River Action Plan*. But sadly, there is no Ottawa River Watershed Plan. Canada, Quebec and Ontario are not on the same page regarding this vast interprovincial watershed. How could one actually assess the impact of a pipeline along or under the river? Or a bridge over the river? Or changes in *biological oxygen demand* in the river basin in the absence of long-term data? And beyond the Ottawa River are the Great Lakes, and the hydrological cycle in general.

Given that knowledge base, any individual EA should have as its first purpose the protection of the environment, as stipulated in the Canadian Environmental Assessment Act, not primarily seek to attenuate negative impacts.

The need for Strategic Environmental Assessments is without counter, but the challenges are daunting. Recently, the NCC has considered natural accounts in valuing its greenspace. Perhaps, this approach could provide a framework for the assembly of the type of ongoing data which are essential to improved environmental assessment processes. Another framework based on "ecological function" is the WWF's National Watershed model. The seven elements in the model are worthy environmental considerations and the supportive monitoring data is a start on assembling base data over time. Canadians need a national ecological model to which everyone can contribute.

If the Panel wishes clarification of our points, please let us know. Wishing you and the Panel members Seasons' Greetings and the best of good fortune in the New Year.

Sincerely,



Paul Johanis, Co-chair  
Greenspace Alliance of Canada's Capital

*Since 1997, the Greenspace Alliance has worked with community organizations and individuals to preserve and enhance natural areas in the National Capital area, including public and private greenspaces, wetlands and waterways. We believe that urban greenness is essential for a community's quality of life, contributing to our personal, social, economic, cultural and spiritual well-being. It also connects us with the natural and cultural history of our region.*