May 15, 2019

Submitted to Ontario’s Environmental Registry (ER)

RE: Modernizing Ontario’s Environmental Assessment Program

The City of Guelph (City) has reviewed the proposed changes posted on the environmental registry pertaining to Modernizing Ontario’s Environmental Assessment (EA) Program (ER0 013-5102). Overall, the City is supportive of the reform direction, and is pleased to see past feedback from the City, and many other organizations, have been considered. In particular, the City offers support for the following changes:

* Amendments to the process for Part II Orders or ‘Bump-Up requests’, as part of the s.61 review to improve EA process times and reduce study costs;
* Better integration and harmonization of the EA process with processes defined under the Planning Act and reduction in the scope of EA reports and studies to reduce duplication with existing public processes and decisions made under municipal Official Plans and provincial legislation; and
* Furthering exemptions for low risk projects and focusing EA efforts on higher risk projects. This focus on risk could be supported by consolidating project schedules consistent with feedback provided by the Municipal Engineers Association.

Beyond the City’s overall support for the changes, the following general comments are also provided for consideration.

* Could guidelines or limits on Part II Order conditions be provided? This would help the City resolve issues and navigate Ministry of Environment, Conservation and Parks (MECP) requirements better when Part II Orders are negotiated.
* As consultation through Public Information Centres (PICs) is a key component to the EA process, the MECP should consider modernizing engagement techniques/expectations to improve the outreach to the public. This could be through requiring more modern outreach techniques be implemented, such as the use of social media, webinars, and video presentations. More specific feedback on this topic is provided in the below discussion regarding notification requirements.
* Could the scope of the digital ER be modernized to share information such as post-development monitoring and evaluation results to support open and transparent data as well as continuous improvement value for other projects?

In addition to the general comments above, the City has the following comments specific to recommendations 3 and 4.

## *Recommendation 3: Find efficiencies in the environmental assessment process and related planning and approvals processes to shorten the timelines from start to finish*

## *Recommendation 4: Go digital by permitting online submissions*

Although not specifically addressed in the discussion paper, improvement of legislated notification requirements of the EA program would support recommendations 3 and 4.

Updating EA notification requirements to be more in line with current online usage behavior in Ontario would support finding efficiencies and an overall digital transformation of the EA program.

Currently, the requirements for EAs include running large ads in local newspapers. Local newspapers remain an important source of news, but are far from the main source of information for most people in Ontario.

Ninety-two per cent of Ontario’s population are internet users and internet use continues to increase across all age groups (<https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2017032-eng.htm>). Ontario is the most connected province with respect to social media use, with 67 per cent of the population using at least one social media channel (<https://www.sherpamarketing.ca/canadian-social-media-stats-updated-2018-471>), and 81 per cent of Ontario municipalities are using social media to promote their work (<https://redbrick.ca/wp-content/uploads/2018/05/Redbrick-Communications-2017-Social-Media-Survey.pdf>).

While there is still a role for local print media to play in notifying people of EAs in their community, the notification requirements need to be updated to reflect the current state of communications and the shift to digital.

1. The current requirements for local newspaper EA notification, whether for a notice of commencement, open houses (“public information centre”) or notice of completion, requires substantial detail to be printed. This text could be reduced to make important information clearer and direct people to an online resource for complete information.
   1. Current ad content example for a notice of commencement:

The study  
The City of Guelph has initiated a Class Environmental Assessment (EA) study for proposed improvements to the deteriorating Norwich Street Foot Bridge. It’s currently closed to vehicle traffic and serves as a pedestrian crossing. The study will address the community’s needs through a number of possible solutions, including: (1) rehabilitation; (2) replacement; (3) removal; and (4) a “do nothing” alternative that would result in the permanent closure of the bridge. The location and approximate extent of the study area are shown on the map.

[MAP]

### The process

The EA will be conducted as a Schedule ‘B’ project in accordance with the Municipal Class Environmental Assessment process (Municipal Engineers Association, October 2000, as amended in 2007, 2011 and 2015), under the Ontario Environmental Assessment Act. The process includes public and review agency consultation, an evaluation of alternatives, an assessment of potential environmental impacts of the proposed improvements, and identification of reasonable measures to mitigate any adverse impacts.

**How to participate**

Late this summer or early fall, local businesses and community members will be invited to attend an open house to review and discuss the EA study. Details will be advertised in the Guelph Mercury Tribune and on **guelph.ca** and circulated to neighbourhood residents and businesses.

### Contact details

* 1. Streamlined, plain language ad content recommendation:

### The project

The City of Guelph has started an Environmental Assessment (EA) to explore a number of options for addressing deterioration of the Norwich Street Foot Bridge. Public consultation is part of this EA. Opportunities to provide comments will be advertised in the Guelph Mercury Tribune, and on the City’s website and social media channels.

For more information about this project and a map of the study area visit **guelph.ca/norwichbridge** or contact the project manager listed below.

### Contact details

1. Digital advertising sources should be considered to complement or replace print newspaper advertising, especially where local print papers have been eliminated. Local digital news sources and social media accounts are effective advertising channels.
2. Templates for commencement, open house and completion notices would be helpful, both for full notices and condensed advertising versions. Individual consultants have a different idea of what information is and isn’t required in notices. As a result, notices are inconsistent across Ontario (in fact the current guidelines state, “The format for notices may vary from municipality to municipality”).

## Plain language

Adoption of plain language into every aspect of the EA process is strongly recommended. Current language is difficult and cumbersome. Plain language is critical in helping everybody understand the EA process and being able to participate in it.

Terms that are cumbersome or difficult to understand include:

* Notice of commencement (An environmental assessment is starting)
* Notice of completion (An environmental assessment is ending)
* Public Information Centre (open house)
* Alternatives (options)
* Preferred alternative (recommended option)
* **Class** environmental assessment (specifically the term “Class” does not explain extra about the process)
* “Schedule X” (the schedule itself means nothing to the public without context of what is required in that schedule, e.g. an environmental assessment with/without public consultation)