

Our File/N/Réf. 45-99-0051
Your File/V/Réf.

DATE 12 April 1999

TO/DEST. Chair and members of Regional Council

FROM/EXP. Commissioner, Planning and Development Approvals

SUBJECT/OBJET **COMMENTS ON REVISED STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE (FINAL DRAFT) PLAN FOR CANADA'S CAPITAL**

On 26 February 1999, the National Capital Commission (NCC) placed advertisements in the local newspapers indicating that an initial environmental evaluation (IEE) of the *Plan for Canada's Capital* was available for viewing and that written comments should be submitted to the NCC by 29 March 1999.

The IEE actually consists of several documents, the IEE (a 5 page staff report), the Strategic Environmental Assessment (SEA) document for the Plan and the supporting SEA Workbook. A revised final draft *Plan for Canada's Capital* also formed part of the documents available for review. Shortly thereafter the NCC also released the Public Consultation Report on the *Plan for Canada's Capital*. This report summarised both public and agency comments and responses to the comments. Staff reviewed all of these documents, and based on the response to the draft *Plan for Canada's Capital* approved by Regional Council on 23 Sep 98, submitted comments on the SEA and final draft *Plan for Canada's Capital* by the response deadline. It was not possible to take a response through Planning and Environment Committee and Council within the response deadline.

Copies of all of the NCC documents are in the Corporate Resource Centre. A copy of the staff response is attached as Annex A. Annex B provides a summary of changes which were made to the *Plan for Canada's Capital* which addressed many of the comments made by RMOC.

Original signed by:
N. Tunnacliffe, MCIP, RPP

Attach. (2)

Information Previously Distributed
To be listed on Planning and Environment
Committee Agenda of 11 May 1999

24 March 1999

ANNEX A

File: 45-99-0051

Ms. Gabrielle Simonyi,
Manager, Environmental Services
Capital Planning and Real Asset Management Branch
National Capital Commission
202-40 Elgin Street
Ottawa, ON K1P 1C7

Dear Ms. Simonyi:

Re: Strategic Environmental Assessment of the *Plan for Canada's Capital*

Thank you for the opportunity to review and comment on the Strategic Environmental Assessment (EA). As a final draft *Plan for Canada's Capital* was part of the materials available for review, we will also provide comments on it. In our comments on the final draft PCC, we will also provide clarification of some of our earlier comments, where the *Public Consultation* report indicates that a comment has not been completely understood.

Strategic EA

The NCC is to be commended for undertaking an environmental assessment of a policy document, a decidedly challenging task. Although statements on pages 11, 19 and 21 of the Workbook indicate that it is NCC policy to use a broad definition of environment (economic, social and biophysical), in practice this EA seems to deal primarily with the biophysical. A specific example is item 2 on page 18 of the Workbook where disposals of land that does not serve a national function and that is not biologically productive "is assumed to be a non-issue for the environmental assessment." Land disposals often create considerable community concern, usually directed toward the issue of urban greenspace, one of the EA's scoped environmental issues.

A related issue involves the definition of Valued Ecosystem Components (VECs) and biologically productive land. Are biologically productive lands defined as Valued Ecosystem Components? The VECs do a good job of capturing special features on federal lands, but they do not account for all the biologically productive land in federal ownership. The Environmental Synthesis map in the Draft Plan shows the special features (Flora, Fauna, Hydrology and Geology) as well as additional tree cover. The role or importance of the natural landscape beyond the special features is not clear when reviewing the plan or the strategic assessment and deserves more direct recognition. Most of these areas have been designated as part of the greenbelt natural system in the Greenbelt Master Plan.

In addition, the Environmental Synthesis Map appears to take a relatively complete and systematic approach to identifying special features within the Greenbelt and on federal lands, but is less complete beyond the Greenbelt. For example, wetlands within the South March Highlands, Constance Creek, and Leitrim area are all shown as significant hydrological features but also

contain important flora and fauna. The intent of the environmental synthesis map beyond those lands directly affected by the Plan (i.e. Greenbelt and federal lands) should be clarified.

The reliance on plan or site-specific EAs as a mitigation measure is a major assumption which permits the conclusion that the potentially adverse environmental effects that may be caused by the PCC are insignificant when considered individually or cumulatively. Where the mitigation measure is a site EA, it seems very difficult to reach conclusions at this stage concerning residual impacts, e.g. for the environmental impacts of expansion of navigable waterways. In consequence, as the EA notes “the quality and reach of the plan- and site-level EAs related to the scoped issues will need to be analysed at regular intervals to reveal how the issues are evolving in cumulative terms.”

Plan for Canada's Capital

Many of our comments have been reflected in changes to the draft Plan.

The PCC now contains a policy to “Ensure the reservation of Capital Pathway corridors within surplus federal lands.” While this is a direct response to an RMOC comment, the response in the Public Consultation report on this issue would indicate that there is room for differing interpretations of “ensure the reservation.” In the particular instance where this issue has arisen, the NCC says they “informed the purchaser of the requirement and requested, through the municipal planning process, that the pathway link be created.” This meant the corridor passed from public to private ownership and then had to be obtained from the private owner through the municipal planning process. These corridors should never be transferred to private ownership. When the NCC is considering disposal of a property affected by a pathway link (identified in the NCR *Integrated Network* study), the local and regional municipalities in co-operation with NCC staff should identify the location and width of the required pathway corridor (this discussion could occur prior to the NCC seeking purchasers or with the participation of the purchaser) and that land would be transferred directly to the intended final public owner. The private purchaser would benefit from the certainty provided by this approach.

We still seek a stronger commitment with regard to storm water management. It is unclear if the cross reference to the NCC's Storm Water Management policy binds just the NCC or all Federal agencies. We request a clear requirement for preparation of a sub-watershed plan for new development or redevelopment areas. This was an issue for LeBreton Flats. We wish to ensure that such a study is part of the initial stages of planning for Rockcliffe Air Base. Such a study would deal with both storm water management issues and the identification of environmental features which should be protected.

RMOC's earlier support for the locational priorities require some qualification. We support the Central Area (defined in the Region's and City's official plans) as the preferred location for federal office employment. Our definition of Central Area is considerably smaller than the Core Area (on the Ontario side) shown in the PCC. Locations in the Core Area but outside the Central Area generally do not benefit from the high levels of transit access and service provided in the Central Area. The Regional Development Strategy seeks to improve the balance between jobs and housing by encouraging new housing in the Central Area and in the neighbourhoods which surround the Central Area.

We still find the commitment to public information and consultation in the Plan Implementation section to be inadequate. As presented, plan monitoring and evaluation could be processes entirely internal to the NCC. The only reference to public consultation is with regard to Plan amendments “which, depending on the scale of the amendment, will include public consultation.” If the PCC is to be the federal government’s lead policy statement on the physical planning and development of the National Capital Region, any changes to the Plan should be a matter of public knowledge and decided on in a process which includes opportunity for meaningful public review and comment. There is not even a commitment to public consultation in the context of comprehensive reviews of the PCC.

I hope these comments are helpful.

Sincerely,

Original signed by:

N. Tunnacliffe, MCIP, RPP

Commissioner, Planning and Development Approvals

NT/cec

Revisions to draft Plan for Canada's Capital which address RMOc comments

Valued Ecosystem Components are now shown on as Significant Physical Features and Significant Biological Features on a map called Environmental Synthesis. Natural Heritage Areas are shown on Maps 3.2 Urban Capital Concept and 3.3 Core Area Concept. The “portions of Natural Heritage Areas designated as of Capital Significance which are not adequately protected” are shown as Addition to NHA on Map 3.2 and consist of additions to the Greenbelt previously identified in the Greenbelt Master Plan.

Capital Parks are now identified on the two concept plans. A margin note in the Capital Urban Green Spaces section indicates that the lands considered Capital parks in the 1988 Federal Land Use Plan, which are no longer considered to fulfill this role include:

- Prince of Wales park (also known as Moffatt Farm) was redesignated surplus, except for shore lands (RMOc initial comments have pointed out that this property is Waterfront Open Space in the Regional Official Plan)
- Shirley's Bay was redesignated as a Natural Heritage Area/Rural
- The south end of Gatineau Park was redesignated from Capital Park to Natural Heritage Area

A new section in Plan Implementation on Land Status includes a list of considerations which apply to surplus Federal lands, including “regional and municipal planning policies and planning processes, including public consultations, where a change in land use is contemplated.”

The Concept Maps now show Capital Arrival routes (e.g. 416, 417 and the VIA rail corridors as requested). (Capital Arrivals were called Gateways in the previous draft Plan.) They also show Scenic Entry routes. While not identical (e.g. the Regional Official Plan includes Scenic Routes which are not Scenic Entries), the policies of the PCC and the Regional Official Plan are compatible.

References to meeting local open space needs have been moved from Urban Design to Capital Urban Green Spaces as suggested.

The policies with respect to protection of built heritage have been made broader in application as suggested. The section also now includes landscape heritage, not a suggestion from the RMOc, but a change which is supported.

The policies for Archaeology now include reference to the NCC study and requiring an assessment by a qualified archaeologist, where archaeological potential exists.

A new margin note in the National Cultural Institutions section defines a “diversified transportation network” to include, among other facilities, “transit on selected parkways or parkway segments”. The policy calls for enhancing “access to national cultural institutions through a diversified transportation system ...especially for those institutions in non-Core Area locations.”

The policy on municipal recognition of the unique contribution and special needs of the diplomatic community has been clarified to refer only to planning-related matters.

The Goal for Federal Office and Research Facilities has been re-worded from “whose location is sensitive to effects on the regional community” to “whose location has regard for regional and local planning objectives.” This adds explicit reference to regional and local planning objectives as requested, although “has regard for” is not as strong as “supports”.

The policies for Federal Accommodation in Non-Core Areas now include a new one, “Work with regional authorities to identify ways to increase the share of transit at nodes and facilities not currently well-served by transit.”

Policy for Inter-provincial Access now state that crossings are “to accommodate cyclists and pedestrians to the greatest extent possible.”

The PCC policy on preserving rail corridors now includes reference to both transportation and utilities as future uses, but gives priority to “recreational pathway use where overlap with the Capital Pathway network exists.” This is not seen as a problem as rail corridors are generally large enough to accommodate a recreational pathway as well as other transportation and utility uses.

The NCC has indicated they could examine a pathway link between the National Museum of Science and Technology and the Core in the Urban Lands Master Plan.