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Ministry of Transportation
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Re: Northern Ontario Multimodal Transportation Strategy Phase 1 Report: The Northern Ontario Context: Implications and Considerations for Strategy Development (EBR Registry Number: 012-7763)

Dear Ms. Evers,

Thank you for the opportunity to comment on the **Northern Ontario Multimodal Transportation Strategy (NOMTS) Phase 1 Report**. The **NOMTS** is a key initiative led by the Ministry of Transportation, Ontario (MTO) and Ministry of Northern Development and Mines (MNDM) to support the implementation of the Growth Plan for Northern Ontario, 2011¹. It sets out a vision and actions to support economic development in Northern Ontario over the next 25 years. The Growth Plan for Northern Ontario is enabled through the *Places to Grow Act, 2005*².

We are submitting this letter in our respective capacities as Wildlife Conservation Society (WCS) Canada scientists specializing in wildlife ecology, conservation biology, cumulative impacts, and landscape ecology in northern Ontario. A national organization, our research and conservation priorities in Ontario are focused primarily on the Far North.

We recognize that Ontario, specifically MNDM and MTO, has significant responsibility over matters relating to transportation, including the maintenance of provincial highways, issuing policy governing land use planning, and developing overarching plans such as the Growth Plan for Northern Ontario, with which all municipal plans must be consistent. In Northern Ontario, the Province is directly responsible for the provision of local roads and other transportation services, such as the 29 remote airports, in unincorporated areas outside of municipal jurisdiction. In the Far North, the Ministry of Natural Resources and Forestry (MNRF), also has a significant responsibility for land use planning in the Far North, with interested First Nations, under the *Far North Act, 2010*³.

Mandate letters issued in 2014 to Ministers in MNDM and MTO highlight the key priorities for Ontario's Far North including:

¹ <http://www.mndm.gov.on.ca/en/northern-development/growth-plan-northern-ontario>

² https://www.placestogrow.ca/index.php?option=com_content&task=view&id=4&Itemid=9

³ The *Far North Act, 2010*, SO 2010, c 18 is available at http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_10f18_e.htm#s5.

- Develop the Ring of Fire, in particular infrastructure planning and development through the Ring of Fire Infrastructure Development Corporation (MNDM);
- Undertake negotiations through the Regional Framework Agreement⁴ with Matawa First Nations, which includes an objective on planning for industrial and regional infrastructure planning and implementation (MNDM);
- Work with the Ministry of the Environment and Climate Change (MOECC) and MNRF on decisions about environmental assessments, cumulative and regional environmental impacts and regional monitoring (MNDM).
- Drive implementation of the Growth Plan for Northern Ontario (MTO and MNDM).
- Integrate and coordinate northern planning and policy, informed by the Growth Plan (MTO and MNDM).
- Develop the northern Ontario multi-modal transportation strategy, primarily for the purpose of improving economic development in the north (MTO and MNDM).

We are supportive of proactive planning that considers the needs for infrastructure in northern Ontario in a strategic and coherent way rather than piecemeal approaches through project-based impact assessment processes and/or community-based land use planning. By making clear Ontario's vision and planning objectives for infrastructure, the NOMTS provides one of the few opportunities in northern Ontario to consider ways in which a regional approach to planning for new infrastructure can reduce direct and cumulative impacts on the environment. We also support the inclusion of ecozones, ecoregions, caribou ranges, and watersheds in the Transportation Strategy Development Implications (p. 19). We consider the attention to climate change in this strategy to be both important and highly relevant, given provincial commitments to mitigation and adaptation and the fact that wildlife, ecosystems, and First Nation communities in the Far North are already experiencing impacts associated with climate change.

Our most significant concerns in the NOMTS relate to the limited treatment of ecological considerations, most notably globally-significant and intact ecosystems of the Far North, which is within the geographic scope of the plan. We are similarly concerned about the implementation of the NOMTS in the Far North given the limitations of current piecemeal environmental planning processes in the Far North to consider planning, design and impacts of infrastructure. As such, we remain unclear as to how NOMTS will be implemented in the Far North.

We provide more detail on these major concerns and specific recommendations (in italics) for revising the NOMTS. Our comments are focused on the Far North, as defined by the *Far North Act, 2010*.

1. Lack of attention to globally-significant ecosystems and vulnerable wildlife in the Far North.

The NOMTS fails to acknowledge the fact that Ontario's Far North is a globally-significant region from an ecological perspective, containing some of the world's largest, intact ecosystems and providing critical services, such as carbon sequestration and climate regulation, well beyond the Far North planning boundary. These ecosystems are intact *because* of the lack of all-weather infrastructure in the Far North and strategies focused on developing new infrastructure must address the environmental costs of affecting this condition more explicitly.

⁴ http://www.mndm.gov.on.ca/sites/default/files/rof_regional_framework_agreement_2014.pdf

As such, the minimum amount of information in the NOMTS (p. 9) is too cursory, understates the significant ecological values associated with ecosystems and wildlife in the Far North, and is inadequate for considering these values at the regional and strategic planning level for infrastructure. We also reviewed the key technical background document for the current draft response and found a total of five lines dedicated to wildlife and ecosystems. Accordingly, we are concerned that these ecological aspects have not been fully considered by MTO and MNDM in the development of this strategy. We recommend the NOMTS expand the Wildlife and Ecosystems section to actually name the key ecosystems such as wetlands and peatlands, identify their values and “services”, and explicitly acknowledge the global significance of these intact ecosystems in the Far North. In addition, we recommend the NOMTS name the species at risk for which Ontario has responsibility and for which infrastructure planning is a well-documented and significant concern for population declines, habitat loss and fragmentation including caribou (both ecotypes)⁵, wolverine, and lake sturgeon.

Specific Recommendations:

- *Revise Wildlife and Ecosystems section on p. 9 to include ecosystems more explicitly including intact boreal forests, wetlands and peatlands in Ontario’s Far North.*
- *Revise Wildlife and Ecosystems section on p. 9 to at least name the species at risk for which the Far North provides significant habitat including caribou, wolverine, polar bears, and lake sturgeon.*
- *Revise Transportation Strategy Development Implications on p. 19 to include ecosystems more explicitly, particularly globally-significant wetlands and peatlands in Ontario’s Far North.*
- *Revise Transportation Strategy Development Implications on p. 19 to clarify what is meant by “caribou migration ranges”. MNRF have defined ranges across the Boreal Shield ecozone and there are also migratory populations in the Hudson Bay Lowlands; both types will be impacted by plans for new infrastructure in northern Ontario.*

2. Lack of attention to sustainability, particularly in remote intact regions like the Far North.

The NOMTS notes that safety and sustainability are overarching objectives for MTO and MNDM in long-term transportation planning (p. 42). While safety is fairly intuitive, it is not clear what is meant by sustainability in transport planning, particularly for remote intact regions like the Far North where transportation corridors for all-season roads, airstrips, and rail are already being actively considered to enable potential mining projects in the Ring of Fire. In addition, new transmission projects (e.g., Wataynikaneyap and Sagatay) and transportation corridor studies (e.g., Regional Community Service Corridor study) to support community needs and interests are underway. It is highly likely that once a road or linear feature is built in the Far North whether for community or industrial needs, it opens up the potential for further development, and creates pressure to build more road networks and power transmission lines. Consequently, NOMTS should provide a more thoughtful consideration of this element of transportation planning in intact regions like the Far North and what MTO and MNDM mean in terms of sustainability. We recommend the NOMTS define sustainability in the context of transportation planning in the Far North and provide relevant criteria for assessing sustainability.

Within the seven planning objectives developed by MTO and MNDM, the NOMTS includes a planning objective focused on improving access to remote communities (e.g., the Far North). In Section 3.2 (p.

⁵ There are two ecotypes of woodland caribou in Ontario identified in the Caribou Conservation Plan based on their primary habitat: forest-dwelling woodland caribou and forest-tundra woodland caribou.

48), some of the positive and negative impacts to communities from increased access are documented. The ecological impacts such as higher risks of forest fires, habitat loss, and impacts on ecosystems are also noted here in the context of community implications of increased access. In general, most of the emphasis in the NOMTS regarding the importance of the biophysical environment in the Far North is presented in the context of engineering challenges associated with developing infrastructure in wetlands or regions of permafrost. While this is correct, unlike the majority of the near north and the rest of Ontario where transportation infrastructure is well established, any new transportation structure - and every vehicle using it - in the Far North would be surrounded by an intact and functioning biophysical environment. In addition, the first road into a natural landscape like the Far North also has the largest relative effect that can cascade and multiply, often resulting in negative consequences for natural processes, wildlife, ecosystems, and local communities (Forman and Alexander 1998). Consequently, the ecological and social effects of roads and vehicles in the Far North have special importance and require careful planning (Forman et al. 2003).

The Far North Science Advisory Panel⁶ recommended that a comprehensive access plan at a regional scale was needed to establish limits on road density, water access and wetland incursion in order to address the significance and character of the entire Far North. Considering transportation impacts to the unique ecological context of this region must be done *prior* to development and land use planning to develop decision-making mechanisms and institutions relevant to the Far North context. Since these issues and recommendations are not being addressed in current environmental planning processes in the Far North (see 3 below), we recommend NOMTS address this aspect of transportation planning in the Far North more explicitly.

Specific Recommendations:

- *Revise Section 3, pg. 42 to define sustainability in the context of transportation planning in general and the Far North in particular.*
- *Provide additional information about how the unique ecological context of intactness and remoteness in the Far North affects transportation planning objectives around sustainability.*

3. Lack of attention to the limitations of environmental planning processes in the Far North

The NOMTS is the closest example of a regional strategic plan developed for northern Ontario that we have seen to date. We have commented elsewhere on how conventional approaches to land use planning will not be sufficient to meet the purpose and objectives set out in the *Far North Act, 2010* given Ontario's current piecemeal approach to infrastructure and mining developments in the Ring of Fire⁷ as well as comments on various policies, programs, and land use plans posted on the Environmental Registry (e.g., Far North Land Use Strategy, Mineral Development Strategy). In meetings with government ministers and staff, we have recommended that MNDM, together with MOECC, and MNRF facilitate the development of a regional approach in the Far North that integrates land-use planning with environmental assessment to provide strategic direction and decision making at community and project scales. We think a regional approach to planning would support NOMTS planning objectives in a more effective and comprehensive way that current planning processes can.

⁶ Available online at: www.mnr.gov.on.ca/en/Business/FarNorth/2ColumnSubPage/266512.html.

⁷ Available online at:

http://wcscanada.org/Portals/96/Documents/RSEA_Report_WCSCanada_Ecojustice_FINAL.pdf

An underlying assumption of the NOMTS, however, appears to be that current land use planning in the Far North, administered by MNRF, and class environmental assessments, individual environmental impact assessments, and regulations, administered by MOECC, will address planning, construction, maintenance, and mitigation of new infrastructure in the Far North will be sufficient to address regional infrastructure objectives. In practise, MNRF's land use planning approach has been applied in landscapes that are already greatly altered from their original condition and where the goal is to protect the "best of what is left" for conservation purposes. In the Far North, it is necessary to reverse this approach, and consider how much development can be supported such that the natural and cultural values and integrity of the region are not compromised by infrastructure and development activities.

The NOMTS cites the Far North Land Use Strategy (FNLUS) only once and this is specifically in the context of the community-based approach that the MNRF is calling "stewardship" (p. 9). While the *draft* FNLUS contains information about various themes relevant to regional-scale planning issues in the Far North, our review confirms that the FNLUS offers very limited information in terms of scope (focusing on community land-use plans) and substance (limited to general advice and no specific guidance), particularly for infrastructure planning in the Far North. In reality, other Ontario legislation provides the legal framework for addressing regional-scale issues including Ontario's Biodiversity Strategy (2011), the *Endangered Species Act* (2007), the Range Management Policy in Support of Woodland Caribou Conservation and Recovery (2014), the Mining Act, Ontario's Mineral Development Strategy (2016), the Long-Term Energy Plan, the Ontario Heritage Act, and Ontario's Climate Change Strategy and Action Plan (2016).

Decisions about infrastructure in the Far North are also being made through project-based impact assessments. Our experience with assessments in the Ring of Fire (e.g., Cliff's Chromite Mine, Noront's Eagle's Nest Project), highlights the inability of proponents to address regional social, ecological, and economic implications of infrastructure within their projects and the local and regional cumulative effects of infrastructure.

Unfortunately, land use planning in the Far North is concurrent, but not *integrated*, with project-based impact assessment making it challenging to address regional and strategic planning for infrastructure and enhance its benefits while addressing its impacts. This means that each community plan will need to be adjusted as new projects – emerging through environmental assessment for example - create demand for infrastructure. Project-based and community-based approaches to infrastructure planning is a piecemeal approach that promotes inefficiency, ineffectiveness, and inequity, and invites cumulative effects. This issue alone would demand a more rigorous and critical assessment of cumulative effects (e.g., triggers, thresholds, indicators) associated with infrastructure planning for regional and industrial needs both in community land use plans and at a broader scale (e.g., watersheds, caribou ranges). We recommend NOMTS be revised to more clearly identify how this regional plan will be addressed in Ontario's current planning processes in the Far North, particularly as they relate to cumulative effects.

Specific Recommendations:

- *Revise Section 2.1 to identify the planning context in the Far North, including community-based land use planning, the role of the FNLUS, and project-based impact assessment.*
- *Revise Section 2.1 to identify how the planning objectives of the NOMTS will inform these processes and decision-making about infrastructure in the Far North.*

4. No references to infrastructure projects and processes underway in the Far North.

Given the role of MDNM in driving the development of the NOMTS and its mandate in the Far North (e.g., Ring of Fire), we were surprised to see no reference to important and highly relevant infrastructure processes and/or institutions in the Far North, including: 1) the Regional Framework Agreement with Matawa First Nations; 2) the Regional Community Service Corridor study; and 3) the Ring of Fire Infrastructure Development Corporation (ROFIDC).

- The Matawa Framework Agreement includes an objective focused on industrial and regional infrastructure planning and implementation, including transportation, energy generation and transmission, on-reserve infrastructure, and regional communications technology. While the NOMTS includes the Ring of Fire in its scenarios, the Matawa agreement has implications for the future of government and First Nations decision making about infrastructure for industry and community needs in the Far North and therefore deserves mention in the NOMTS. As with the box highlighting the Wataynikaneyap Transmission project (p. 48), we suggest including a box highlighting the Matawa Framework Agreement in Section 3.2.
- The Regional Community Service Corridor study is a partnership between four remote Far North communities: Webequie, Eabametoong, Neskantaga and Nibinamik. Funded by the provincial and federal government, the \$732,000 project is focused on using satellite imagery and GIS mapping, together with community consultations, to consider the broader transportation, economic and environmental issues. The study will also assess costs and suitability of moving freight and passengers over a number of route scenarios between these communities and the provincial road network. Because this study is not mentioned in the NOMTS, these scenarios and outcomes do not seem to have been considered and likely have implications for regional infrastructure planning associated with community interests and needs.
- The ROFIDC is a not-for-profit corporation established by the Ring of Fire Secretariat. One of the key roles of ROFIDC is to “encourage and assist exploration for and development of mineral deposits in the Ring of Fire by financing, building, operating and maintaining strategic transportation infrastructure including industrial and community access roads”. The NOMTS does not mention this institution and their potential role in infrastructure planning. While there has been no public information about what the ROFIDC is considering with respect to infrastructure scenarios, we assume their work and recommendations will have significant bearing on regional infrastructure for industry and possibly communities in the Far North.

Specific Recommendations:

- *Revise Section 3.2 to include a box highlighting the Matawa Framework Agreement, given implications on the Ring of Fire infrastructure and development and the Regional Community Service Corridor.*
- *Revise Governance, Policy and Funding section, particularly Provincial Government (p. 14) to include reference to ROFIDC and acknowledge the role of this institution and implications for scenarios and infrastructure planning proposed in the NOMTS.*

In conclusion, Ontario's Far North is one of the most ecologically important wild areas in Canada – and the world. We have invested significant time and resources into developing a better scientific understanding of the region and are committed to both continuing to build this knowledge and using it to help further efforts to ensure a sustainable future for the species and people living in this globally important area. We look forward to continuing to work with your ministry toward this objective. Please contact Cheryl Chetkiewicz (cchetkiewicz@wcs.org or 807-285-9125) if you require further clarification or information regarding our comments.

Sincerely yours,



Cheryl Chetkiewicz, PhD



Justina Ray, PhD

cc: Environmental Commissioner of Ontario (ECO)

References:

Forman, R. T. T. and L. E. Alexander. 1998. Roads and their major ecological effects. *Annual Review of Ecology and Systematics* **29**:207-231.

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