Ontario Federation of Agriculture

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September 1, 2021

Sally Renwick
Ministry of the Environment, Conservation and Parks
Environmental Assessment Branch
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Toronto, ON
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Sent Via Email: Sally.Renwick@ontario.ca eamodernization.mecp@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

Dear Sally Renwick,

Re: ERO # 019-3937 - Updating Environmental Assessment Requirements For Transmission Lines

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over $47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

We are pleased to provide comments from an agricultural and rural Ontario perspective on the Ministry proposal to update the environmental assessment process for transmission projects.

OFA supports expeditious Environmental Assessment (EA) processes for transmission infrastructure while ensuring strong environmental protection. EA processes should eliminate duplication, streamline procedures, include measurable service standards, and better recognize other planning processes.

We recommend the Ministry commit to the inclusion of Agricultural Impact Assessments (AIAs) for all projects that have the potential to affect agricultural operations. This applies to projects requiring an EA, and for projects that could be excluded from the Environmental Assessment Act.

For clarity, we continue to support using Class Environmental Assessments for all projects:

- in Specialty Crop Areas as defined in the Provincial Policy Statement (PPS) under the Planning Act,
- on Agricultural Lands classified in classes 1 to 4 under the Canada Land Inventory (CLI), or
- projects expected to affect agricultural operations.

OFA realizes that some projects do not have significant environmental effects, and do not require following the full Class EA Process. OFA supports a process to screen out project proposals with suitable technical parameters and environmental situations which would have minimal agricultural system and environmental effects, on a case-by-case basis, to determine if a project could be screened out of the Class EA Process.

We support this process to include projects such as pole or transmission structure installations within existing rights-of-way (ROW), upgrade or modification of a transmission station involving acquisition of less than four hectares (or 10 acres), connection facilities including line taps and switching stations, and telecom stations constructed solely for monitoring transmission systems. Considering the smaller footprint compared to a 230 kV station, OFA supports inclusion of the construction of a 115 kV transmission station in the EA Screening Process.

We recommend all transmission station construction proposals in rural Ontario include an assessment of the potential risks and planned mitigation of uncontrolled ground current that may be intensified by of the construction of a station. Uncontrolled ground current can negatively impact the health of livestock.

OFA does not support the inclusion in the screening process of the construction of overhead transmission lines of between two and four kilometres in length. Considering ROWs for 115 kV and 230 kV lines lines are 35 metres wide and 45 metres respectively, a new two to four kilometre long transmission line is a significant project at 7 to 18 hectares (or 17 to 44 acres) in size. OFA recognizes that in some cases there could be environmental situations present which warrant a detailed study. We recommend the Class EA Process proceed in the case of these projects.

OFA supports using an EA Screening Process, where a project proponent must, at a minimum:

- Consult with all levels of affected government officials and agencies, Indigenous communities, stakeholders, the agricultural community, and interest groups to identify environmental concerns,
- Provide information publicly on project scope and the project study area, and
- Provide description of screening results, information that determined potential environmental effects and documentation related to how the Class EA Screening Process was assigned.

OFA supports a Screening Process to ensure all the following:

- No conflicts with provincial environmental goals, standards, policy statements or guidelines, or by communities where a project is to be located;
- No significant effects on persons or property;

- No irreversible commitments of any significant amount of Specialty Crop Area, or Agricultural Land classified in Canada Land Inventory (CLI) classes 1, 2, 3 and 4;
- No detrimental effect on air quality, water quality, water quantity, or on ambient noise levels for adjacent areas;
- No significant interference with wildlife species, species at risk, or their respective habitats;
- No precedents or new technology which is likely to have significant environmental effects;
- No screened projects that are pre-conditional to more environmentally significant projects;
- No significant secondary effects of projects, which will adversely affect the environment;
- No disruption of pleasing views or affects to the aesthetic image of the surrounding area;
- No undesired or inappropriate access to previously inaccessible areas, including farmland;
- No removals of a significant amount of timber resources;
- No significant effects to natural heritage resources: and
- No significant effects to cultural heritage resources.

OFA supports a process to ensure that if, during the Class EA Screening Process, a person identifies potential direct or indirect effects that cannot be addressed, the project become subject to the Class EA Process. We support a five year review of the EA Screening Process and the Class EA Assessment Process to ensure compliance with legislation, regulations and the EA Act.

Improving the efficiency of EA processes for transmission infrastructure, better aligned of other planning processes will help ensure strong environmental protection. We recommend the ministry commit to the adoption of AIAs for all transmission projects that impact Ontario's farm operations, to also help ensure strong protection of our agricultural systems.

Sincerely,

Peggy Brekveld

Peggy Brekveld
President

cc The Honourable David Piccini, Ontario Minister of Environment, Conservation and Parks
The Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors