







### Guide to the Parks Canada Environmental Impact Analysis Process





#### **Approved by:**

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**Signed on:** June 19, 2015

**Note:** This guide may be subject to modification from time to time in order to reflect changes in legislation or policy or to improve the practice of environmental impact analysis. Users of the Guide should consult with Parks Canada representatives to ensure that they are using the most up-to-date version.

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In keeping with its mandated priorities, Parks Canada's EIA process examines how a project may lead to adverse effects on natural resources, cultural resources, and visitor experience.

#### 1 Background and Introduction

This guide describes the environmental impact analysis (EIA) process developed by Parks Canada to fulfill its requirements as a federal land manager¹ under the *Canadian Environmental Assessment Act, 2012* (S.C. 2012, c. 19, s. 52) as well as its legal and mandated obligations to protect Canada's natural and cultural heritage. The purpose of this guide is to provide Parks Canada staff as well as external proponents, stakeholders, partners and Indigenous groups an understanding of how the EIA process works, when an EIA must be undertaken and what Parks Canada's requirements are for project proposals within a Parks Canada protected heritage place².

### **EIA** is an important means for Parks Canada to:

- Meet its obligation under CEAA 2012 to determine if the carrying out of a project is likely to cause significant adverse environmental effects;
- Systematically, efficiently and pro-actively evaluate projects within protected heritage places to ensure they are as well designed as possible to avoid or reduce adverse effects, and
- Achieve the Agency's mandate to protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment.

#### 1.1 Parks Canada's Approach to EIA

Parks Canada's legal accountability under Section 67 of *CEAA 2012* (the Act) is to ensure that no project on the lands and waters it manages is authorized **unless a determination is made that the project does not have the potential to result in significant adverse environmental effects.** The Act provides discretion regarding how to conduct an analysis to determine whether or not a project is likely to cause significant adverse environmental effects<sup>3</sup>.

The *Parks Canada Directive on Impact Assessment (2015)* outlines the legislative and policy requirements and accountabilities for the assessment of impacts of proposed projects within Parks Canada protected heritage places. In keeping with its mandated priorities<sup>4</sup>, Parks Canada's EIA process examines how a project may lead to adverse effects on:

- Natural resources such as species at risk, air, ground and surface water, soils, habitat features, as well as plants and animals found in the vicinity of a project or otherwise potentially affected by it, and
- Cultural resources including potential adverse effects to heritage value and character defining elements of known cultural resources, and risks to areas with high potential to contain cultural resources where no inventory has yet been completed.

<sup>&</sup>lt;sup>1</sup> This guide does not address how Parks Canada will participate in environmental assessments of designated projects conducted by the Canadian Environmental Assessment Agency, National Energy Board, or Canadian Nuclear Safety Commission under CEAA 2012. Information regarding how Parks Canada implements impact assessment requirements for projects under northern impact assessment regimes is available on the Parks Canada intranet site or from a Parks Canada Impact Assessment Officer.

<sup>&</sup>lt;sup>2</sup> Protected heritage places include national parks, national park reserves, national historic sites administered by the Parks Canada Agency, historic canals, national marine conservation areas, national marine conservation area reserves, the Rouge National Urban Park and any other lands and waters administered by the Parks Canada Agency.

<sup>&</sup>lt;sup>3</sup> CEA Agency. (June 2013). Operational Policy Statement – Projects on Federal Lands and Outside Canada Under the Canadian Environmental Assessment Act, 2012. Accessible online at: http://www.ceaa-acee.gc.ca/Content/2/2/C/22CA364E-3D36-41C1-8B38-F602B722C9C4/Federal\_lands\_Outside\_Canada\_OPS-eng.pdf

<sup>&</sup>lt;sup>4</sup> CEAA 2012, Section 5; Parks Canada Agency Act (S.C. 1998, c.31)

In addition the Parks Canada EIA process requires consideration of potential indirect effects of a proposed project; specifically, how the effects of a proposed project on natural resources may in turn cause:

- adverse effects to characteristics of the environment important to key visitor experience (how the proposal is anticipated to affect activities and/or visitors' enjoyment and connection to place, in relation to defined objectives for the protected heritage place);
- · adverse effects to health and socio-economic conditions of Indigenous and non-Indigenous peoples, and
- adverse effects to Indigenous people's current use of lands and resources for traditional purposes<sup>5</sup>.

Collectively, these types of impacts are referred to throughout this document as "environmental effects" or simply as "effects".

#### 1.2 Is an EIA Required?

One of the key objectives of Parks Canada's EIA process is to ensure project review is conducted efficiently and that effort is focused on projects with the greatest potential for adverse environmental effects. This is accomplished through the selection of an appropriate *EIA pathway*, as the depth of analysis varies with each pathway, enabling alignment with the risk and likelihood of the project causing significant adverse environmental effects.

The EIA process should not be used as the means to obtain public, stakeholder and Indigenous input on policy decisions in relation to a project proposal; such engagement and consultation processes should be conducted separately from, and in advance of the EIA process. An EIA will not be undertaken until the policy decision on a project proposal has been made.

Determination of the need for an EIA and selection of the appropriate pathway is based on review of the project description.

- If Parks Canada determines that there are no potential adverse environmental effects from a proposed project, no EIA will be required.
- If there is potential for adverse effects, Parks Canada will evaluate which EIA pathway is appropriate.

This initial analysis of the requirement for an EIA is documented in a standard template ("the **EIA Requirement Checklist**"), which is approved by the Field Unit Superintendent (FUS) or Director of a Waterway, and provided to the proponent<sup>6</sup>.

Bridge Replacement Project, Cape Breton Highlands National Park. Whether assessed by a BIA or a DIA, Best Management Practices can be used to streamline parts of the analysis of larger projects.

#### 1.3 EIA Pathways

The EIA process includes four impact analysis pathways. Selection of an appropriate EIA pathway is based on the nature of the project's interactions with the environment (i.e. the complexity of the interactions) and the project's potential for significant adverse environmental effects (i.e. the level of environmental risk posed by the project).

The four pathways are:

- 1. Alternate Process
- 2. Best Management Practice
- 3. Basic Impact Analysis (BIA)
- 4. Detailed Impact Analysis (DIA)

The four pathways are described in detail in **Section 2.3** and the process used to determine the pathway is illustrated in **Figure 1**.

<sup>&</sup>lt;sup>5</sup> Parks Canada must engage in additional and separate consultations with Indigenous groups if there is a possibility of a project causing direct or indirect adverse effects to established or potential Indigenous or Treaty rights. This is required in order to fulfill federal government responsibilities in upholding the honour of the crown. Parks Canada employees should seek expert advice on the need for consultation if required. Additional guidance on this topic is available, and it is not further addressed in this guide.

<sup>&</sup>lt;sup>6</sup> Note that the Associate VP, Asset Management and Project Delivery, is accountable for providing leadership for the implementation of the Parks Canada impact assessment program in relation to highway and waterway projects identified in Parks Canada's Investment Program. This means that in certain circumstances, EIA process steps will require joint approval by the Associate VP and either the Field Unit Superintendent or the Director of a Waterway. Consult the Parks Canada Impact Assessment Directive for further information.

<sup>7</sup> In Torngat Mountains National Park, the *Labrador Inuit Land Claims Agreement* includes specific requirements for project evaluations. As a result, the pathways available may vary. For these exceptions, please contact a Parks Canada Impact Assessment Officer for further advice.

#### 2 Integration of EIA into Project Planning

EIA work generally follows a sequence of predictable and methodical steps that should be integrated with the overall planning of your project proposal. Since the granting of authorizations to implement<sup>8</sup> a project will not occur until the EIA has been completed, approved and the results taken into account in decision-making, it is important to gain a clear understanding of the EIA process and potential permitting requirements, in order to develop a realistic project timeline and avoid unnecessary surprises and delays. EIA work may also extend to follow-up requirements for approved projects. Additional detail on each of the following key steps is provided in subsequent sections.

- 1. Development and submission of a project description
- 2. Parks Canada review of the project description
- 3. Selection of the appropriate EIA pathway
- 4. Preparation of the EIA
- 5. Parks Canada review of the EIA and determination of the significance of effects
- 6. Parks Canada decision on the project proposal
- 7. Project implementation and follow-up

Information on the Parks Canada EIA process is also available from Parks Canada Impact Assessment Officers. They can discuss the EIA requirements, answer questions and identify other review and permitting requirements that may be associated with a project proposal. Information on related legislative requirements under the *Species at Risk Act*, the *Fisheries Act*, the *Navigation Protection Act*, and the *Migratory Birds Convention Act* is provided in Section 3.

### 2.1 Development and Submission of a Project Description

Providing a detailed project description is the first step to having your proposed project considered by Parks Canada. It is used by Parks Canada to evaluate if your project is acceptable from a legal and policy perspective and if so, whether an EIA is required and the EIA pathway to be applied.

The development and submission of good quality project description information will facilitate and streamline the review of a project proposal. It is also work that can be incorporated directly into any EIA report that may be required.

The Parks Canada project description template, which outlines information requirements, is provided in **Appendix 1**; however, it is a good idea to contact Parks Canada staff from the protected heritage place where your project is proposed before commencing a project description, to confirm specific requirements. In general, a project description should provide a summary of the "who,



A good project description considers the need for staging areas and access routes, and accounts for influence of inclement weather on the project such as heavy snowfall or rain.

what, where, when, why, how" of a proposed project: i.e. who is proposing and undertaking the work; what the project consists of; where the project will be sited (along with a description of natural and cultural resources and the adjacent built environment); when the project will be undertaken; why it is being undertaken, and how it will be carried out.

<sup>&</sup>lt;sup>8</sup> Implementation here refers to the carrying out of any physical activity that may lead to adverse environmental effects, rather than the development of designs or the conduct of studies in relation to a proposed project.

#### 2.2 Parks Canada Review of the Project Description

Parks Canada will review submitted project descriptions for consistency with Parks Canada management objectives and requirements. This may include review by Parks Canada specialists in realty, planning, architecture, cultural resource management, archaeology and impact assessment. This initial review is conducted to identify any potential conflicts with legislation, Parks Canada policies and plans, management objectives, potential issues (such as cause for public concern), and to ensure the level of information is sufficient to facilitate the completion of an EIA.

Incomplete project descriptions or those with insufficient detail will be returned to the proponent with an overview of deficiencies to be addressed.

#### 2.3 Selection of the Appropriate EIA Pathway

Each proposed project will be evaluated by Parks Canada to determine its potential to cause adverse environmental effects. As shown in **Figure 1**, no EIA is required if initial review of the project description by Parks Canada determines:

- the proposed work is in relation to national security or an emergency situation as defined by CEAA 2012 (S.70); or
- the **same** proposal<sup>9</sup> **was previously assessed** in sufficient detail. In this scenario, Parks Canada would conduct an internal review and confirm with the proponent whether the previous assessment is adequate and applicable; or
- the proposal is NOT likely to cause adverse
  effects to natural or cultural resources that
  require mitigation, AND there is no
  uncertainty or need for further
  investigation regarding the potential
  for adverse effects.

If a proposed work **is** considered likely to cause adverse environmental effects, it will be assigned to the EIA pathway deemed by Parks Canada to be the most appropriate to address the potential effects.

The EIA Decision Framework (**Figure 1, p.9**) and associated criteria (**Appendix 2**) will guide selection of the most appropriate EIA pathway in the context of the project and site-specific circumstances. The **EIA Requirement Checklist** will be used to document whether an EIA is required, and if so, which EIA pathway is to be applied. The Field Unit Superintendent/Director of a Waterway or their delegate approves this selection.



Culvert Replacement, Jasper National Park. The National BMP for Highway Infrastructure could be used to address some or all of the potential adverse effects of these types of projects.

#### 2.3.1 Best Management Practices

This pathway will be applied when Parks Canada has approved a set of pre-determined environmental management and mitigation measures for a defined class of routine, repetitive projects with well understood and predictable effects. Best Management Practices (BMPs) are intended to maximize efficiency for recurring, standard projects through creation of a pre-approved impact assessment that can be applied repeatedly to similar projects. BMPs may be developed at the field unit level, or national BMPs may be developed for local application and/or adaptation¹o.

Parks Canada may determine that a BMP can be applied in whole, or in part, to mitigate adverse environmental effects of a proposed project. In circumstances where potential environmental effects can be fully addressed through one or more BMPs, **no additional impact analysis is required**. Parks Canada Impact Assessment Officers may make clarifications or additions to a BMP to provide improved protection for resources on a case-by-case basis although in general, a BMP is not applied if the potential adverse effects of a proposal are outside the scope of the effects the BMP was designed to address.

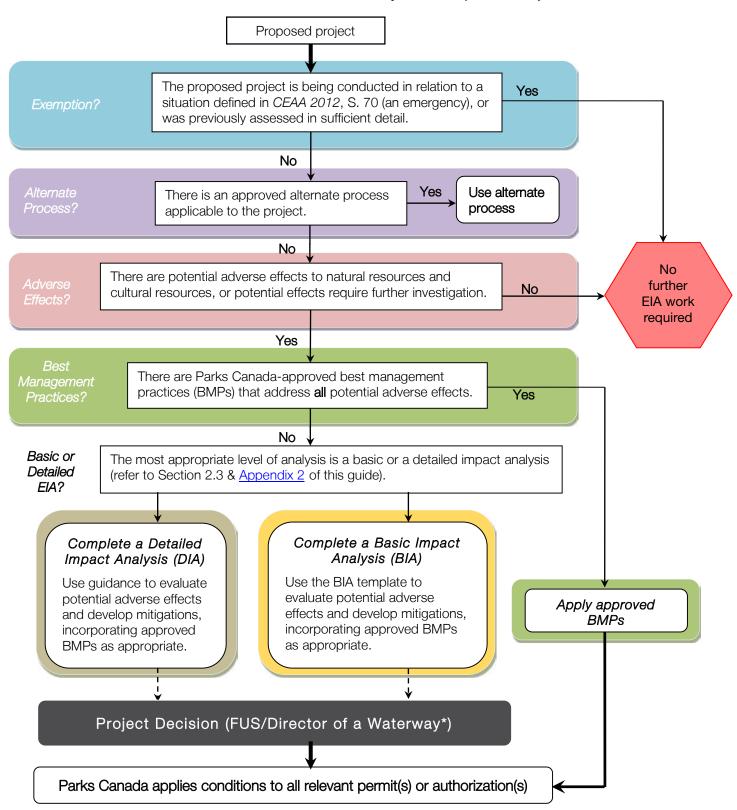
If approved BMPs only address some of the potential adverse effects associated with a project proposal, then the appropriate BMPs can be applied to streamline analysis and mitigation within another pathway (i.e. an approved alternate process, basic impact analysis, or detailed impact analysis). Parks Canada will advise proponents of any BMPs that may be applied to a proposed project along with any project-specific clarifications or additions.

<sup>&</sup>lt;sup>9</sup> Note it must be the same project – i.e. in the same location, not simply a similar project that was previously assessed.

<sup>10</sup> Parks Canada staff interested in developing a BMP should consult the document "Parks Canada EIA Process Guidance: Developing and Using Best Management Practices".

Figure 1 - EIA Decision Framework:

#### Process for Parks Canada to Determine EIA Pathway for a Proposed Project



<sup>\*</sup> Highway and waterway projects identified in Parks Canada's Investment Program may require joint approval with Associate VP, Asset Management and Project Delivery; however, the FUS/Dir. of a Waterway is responsible for issuing permits and authorizations for those projects.

#### 2.3.2 Basic Impact Analysis

Basic impact analysis (BIA) is likely to be the appropriate level of review for projects where:

- the adverse effects are predictable and well understood
- the adverse effects will be confined to the project site or immediate surroundings
- mitigation measures and impact management techniques are familiar

A BIA is usually conducted using a standard Parks Canada template that enables an EIA practitioner to lay out how a proposed project will interact with the environment, particularly with valued components<sup>11</sup> such as specific natural or cultural resources. For projects subject to BIA, Parks Canada will provide the template, identify any BMPs that may be applied as part of the analysis, and provide other site and project-specific direction needed to complete the BIA. The level of detail in a BIA will vary dependent on the level of complexity and risk posed by the project. Generally, projects assigned to this pathway do not generate significant concern from public and stakeholders in relation to potential effects of the project proposal.



The Night Birds Returning Ecological Restoration Project was assessed using the DIA pathway. Gwaii Haanas National Park Reserve



Low complexity projects that occur in sensitive settings will typically require some site-specific analysis via the BIA pathway. Clyburn River Shoreline Stabilization, Cape Breton Highlands National Park.

#### 2.3.3 Detailed Impact Analysis

The most comprehensive level of assessment, a DIA, is intended for complex projects that require in-depth analysis of project interactions with valued components that may affect a particularly sensitive environmental setting or threaten a particularly sensitive valued component. These types of projects may lead to high levels of concern from public, partner or stakeholders and Indigenous peoples in relation to the potential for adverse effects. DIA is the most intensive form of EIA required by Parks Canada and may require evaluation of alternatives, expert advice, and development of a follow-up monitoring program<sup>12</sup>. In addition, this level of EIA requires public engagement and consultation, including:

- Notification from Parks Canada to relevant parties (the public, stakeholders, Indigenous peoples) of the decision to undertake a DIA for a project, and provide information on the planned EIA including a project summary, an overview of the valued components to be assessed, and an outline of planned review, engagement and consultation opportunities.
- Opportunity to review and comment on the draft DIA, at a minimum, is required (the opportunity to review the draft Terms of Reference for the DIA may also be considered, at the discretion of the Field Unit Superintendent/Director of a Waterway).

The level of detail in a DIA and the type of engagement and consultation undertaken will vary from project to project and will be proportionate to the risk and likelihood of the project leading to significant adverse effects. Additional information on the DIA process is found in **Appendix 2** – Guidance for Determining the Requirement for a DIA as well as in the "**Parks Canada Detailed Impact Analysis Process Outline**", available from Parks Canada.

<sup>&</sup>lt;sup>11</sup> The term "valued components or "VCs" is often used in EIA to refer to specifically identified values that have a higher probability of being affected by a project and are considered to be particularly important to fulfilling Parks Canada's mandate. Once identified, VCs become the focus of an analysis and therefore help ensure the greatest effort is put into evaluating how the project may affect the elements most at risk.

<sup>&</sup>lt;sup>12</sup> Follow-up monitoring is conducted to verify the accuracy of an impact assessment (i.e. the prediction of adverse environmental effects) and to determine the effectiveness of any measures taken to mitigate the adverse environmental effects of a proposal. Follow-up monitoring may continue after the construction of a physical work is completed.

#### 2.3.4 Alternate Process

In certain cases, a proposal may be subject to a planning or permitting process other than EIA. If Parks Canada has approved this additional process as providing an integrated means of meeting the legal requirements of CEAA 2012<sup>13</sup>, then a separate EIA is not required. Parks Canada will advise a proponent of any such process and of its requirements in the event this pathway can be applied. Please consult a Parks Canada Impact Assessment Officer for more information.

#### 2.4 Preparation of the EIA

The EIA must be prepared by the proponent in accordance with guidance related to the EIA pathway selected for the project and any other specifications identified by Parks Canada.

 For projects addressed through application of one or more BMPs, Parks Canada will provide the proponent with the BMPs, and any additions or clarifications regarding their use. The proponent must apply the BMPs in accordance with the conditions specified in the relevant Parks Canada permit or authorization. No additional impact analysis is required, provided all effects are addressed by the BMPs.

More detailed information on the BIA and DIA pathways is available from Parks Canada, including the template for conducting a BIA. Project-specific direction may also be provided by Parks Canada specialists for any of the EIA pathways. As previously mentioned, communications with Parks Canada staff is highly recommended early in the project planning phase.

# 2.5 Parks Canada Review of the EIA and Determination of the Significance of Residual Adverse Environmental Effects

Once a draft EIA that meets Parks Canada's requirements has been prepared and submitted for review, a Parks Canada Impact Assessment Officer will evaluate, in accordance with the legal obligation under CEAA 2012, whether the project is likely to cause significant adverse environmental effects.

- This step does not apply to projects fully addressed through BMPs, as Parks Canada's decision to apply the BMP pathway reflects a determination that the project proposal will not result in significant adverse effects once the BMP is applied.
- Any alternate process, BIA or DIA must include a step to determine the significance of any residual adverse effects (i.e. effects that cannot be prevented or avoided through the application of mitigation measures).
- For a BIA or DIA done by an external proponent, Parks Canada will make the determination of significance following review of the draft submitted by the proponent. Some revisions are usually required as part of the review process before the final draft is submitted to the Field Unit Superintendent/Director of a Waterway for decision.

### 2.6 Parks Canada Decision on the Project Proposal

Once the significance of a proposed project's adverse effects has been evaluated, a recommendation is made to the Field Unit Superintendent, Director of a Waterway or delegated manager who has the authority to finalize and approve the EIA. The Field Unit Superintendent, Director of a Waterway or delegated manager makes a decision regarding approval of the proposed project, taking into account the EIA determination of significance and any recommended conditions related to the project proposal. Permits and authorizations to implement a proposed project will not be granted until the EIA has been finalized and approved.

Note that if Parks Canada determines that a project **IS likely to cause significant adverse environmental effects, Parks Canada CANNOT authorize proceeding with the project**, as per the legal requirements of CEAA 2012, Section 67.

#### 2.7 Project Implementation and Follow-Up

Once an EIA is approved with a determination that there are no significant adverse environmental effects, project authorizations and associated permits for implementing the project can be issued. Parks Canada will integrate conditions of approval (e.g. mitigation, surveillance and follow-up monitoring requirements) into project authorizations and permits.



Staff monitoring riparian vegetation re-establishment, Cape Breton Highlands National Park.

<sup>13</sup> Only the Vice President, Protected Areas Establishment and Conservation Directorate may approve an alternate process.

- If a follow-up monitoring program is required, the duration of the monitoring program and any reporting requirements regarding the results of the program will be specified in project authorization documents and permits.
- Parks Canada may require or conduct surveillance<sup>14</sup> of the project throughout its implementation, to confirm work is being carried out in accordance with the conditions specified in the EIA and associated project authorizations and permits. Surveillance results will be documented, and the Field Unit Superintendent/Director of a Waterway may require corrective action be undertaken if surveillance results indicate the project is not being conducted in accordance with specified requirements.

#### **3 Additional Considerations**

#### 3.1 Species at Risk Act Considerations

Species at risk are found in many protected heritage areas. Both the *Species at Risk Act* (SARA; *S.C. 2002, c. 29*) and CEAA 2012 require consideration of the potential effects of proposed activities to a species at risk, its residence or critical habitat<sup>15</sup>. In addition, in certain circumstances, an authorization under SARA may be required. Parks Canada Impact Assessment Officers and **Species Conservation and Management Specialists** are available to provide advice to project proponents regarding species at risk requirements.



Gray Ratsnake (Pantherophis spiloides), a threatened species. Thousand Islands National Park.

#### 3.2 Additional Legislative Requirements

The following legislative requirements, which fall outside the authority of Parks Canada, may affect project scheduling and should be taken into consideration early in the project planning process.

- When work is proposed in or around water, specific provisions of the *Fisheries Act* may apply to the project. It is the proponent's responsibility to understand and address the requirements of the *Fisheries Act*, including determining whether there is a need to obtain advice on potential effects from the Department of Fisheries and Oceans (DFO) and the requirement for obtaining any authorization from DFO. Analysis of the potential for "serious harm to fish" should be integrated into the EIA and thoroughly documented. Prior to approving an EIA, Parks Canada must ensure the EIA adequately meets *Fisheries Act* requirements.
- A permit from Transport Canada may be required for work in a waterway listed in the **schedule** of the Navigation Protection Act.
- Requirements under the Migratory Birds Convention Act
  may also affect project timing, as the Migratory Birds
  Regulations prohibit the disturbance or destruction of
  nests and eggs of migratory birds. It is therefore important
  to identify nesting timing windows, particularly if the
  project includes the removal of vegetation that provides
  nesting habitat.



The *Migratory Birds Regulations* prohibit the disturbance or destruction of nests and eggs of migratory birds.

<sup>&</sup>lt;sup>14</sup> Surveillance is intended to verify that mitigation measures are implemented as required (sometimes referred to as compliance monitoring or site inspection). Surveillance is not the same as follow-up monitoring (see footnote 11).

<sup>15</sup> SARA, Section 79; CEAA 2012, Section 5

Additional information regarding these requirements can be found from the following sources:

- FAQs (internal): Fisheries Act Facts: http://intranet2/our-work/natural-resource-conservation-branchtest/environmental-assessment/guidance-and-tools.aspx
- Working around Water: DFO webpage: http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html
- Consideration of impacts to migratory birds: Environment Canada web page https://www.ec.gc.ca/paom-itmb/default. asp?lang=En&n=8D910CAC-1
- Navigation Protection Act information: https://www.tc.gc.ca/eng/programs-623.html

#### 3.3 UNESCO World Heritage Sites

Parks Canada manages several UNESCO World Heritage Sites, including natural World Heritage Sites such as Nahanni National Park Reserve and Gros Morne National Park, and cultural World Heritage Sites such as the Rideau Canal (see the Parks Canada **website** for further information on Parks Canada World Heritage Sites). These sites are inscribed on the World Heritage List on the basis of the identified "Outstanding Universal Value" (OUV) of the site, which reflects the characteristics that contribute to the site's international significance. For projects that may affect a Parks Canada-administered World Heritage Site, any potential effects to the OUV of the site must be considered during the project review. This approach is in keeping with the advice of the World Heritage Programme of the International Union for the Conservation of Nature (IUCN)<sup>16</sup>.





Gros Morne National Park UNESCO World Heritage Site

<sup>&</sup>lt;sup>16</sup> IUCN, November 2013. World Heritage Advice Note: Environmental Assessment.

#### 3.4 Working With Other Federal Authorities

In some instances, there may be multiple federal authorities with a CEAA 2012 Section 67 responsibility involved in the review of a project proposal. In this situation, during project planning discussions, Parks Canada staff should ensure that all federal authorities involved in the project review are aware of Parks Canada's EIA process and legal and mandate requirements. A lead authority may be selected to coordinate the environmental analysis of the project. Parks Canada may perform this federal coordination role, or for larger projects that extend outside of Parks Canada's lands, the lead may fall to another federal authority. In this scenario, each federal authority retains the responsibility to make a Section 67 determination with respect to the likelihood of significant adverse environmental effects.

For any project requiring federal coordination, Parks Canada will therefore conduct its own review of impact analysis documents and make a determination with regard to the significance of effects. In keeping with its legal and mandated priorities, Parks Canada must ensure the impact analysis and mitigations address potential effects to natural and cultural resources. Approval of the final report by the Field Unit Superintendent or Director of a Waterway is required.

### 3.5 Changes to a Project That Has Already Been Assessed

If a proponent proposes changes to a project or there is new information regarding the potential impacts of a project for which an EIA has already been conducted, the existing EIA may still be used, provided any project elements that were not previously assessed are added as an addendum and submitted for approval. The addendum should include:

- · a brief description of proposed changes
- a list of additional environmental and residual effects
- required mitigations
- space for Parks Canada to make an updated determination of significance
- a signature block for approval by the Field Unit Superintendent, Director of a Waterway or delegated manager.

The use of an addendum may not always be appropriate, depending on the scope of the proposed changes. The Field Unit Superintendents/Director of a Waterway will decide whether the use of an addendum is reasonable for a specific project.

#### 4 Tools and Resources for EIA

#### 4.1 Tools and Resources for Parks Canada Staff

The **Impact Assessment** page on the Parks Canada Intranet<sup>17</sup> is the hub for additional information and helpful tools for EIA. Useful resources include copies of policy and process guidance, as well as templates and detailed information for preparing project descriptions, conducting surveillance, integrating SARA and Fisheries Act considerations into EIA, obtaining SARA authorizations, and conducting a BIA or DIA. In addition, there is access to a contact list of Impact Assessment Officers across the country and a link to the **SharePoint** site where BMP resources and the National Impact Assessment Tracking System are found.

### **4.2 Tools and Resources for External Proponents, Stakeholders, Partners and Indigenous Groups**

Individuals external to Parks Canada will not be able to access the Parks Canada intranet, but are encouraged to contact a Parks Canada Impact Assessment Officer at the relevant protected heritage place in order to obtain additional information. For assistance in finding an appropriate contact, email Parks Canada at **EA.EE@pc.gc.ca**.



Tussock cottonsedge (*Eriophorum vaginatum* L. ssp.*spissum* (Fern.), Sandy Pond Trail, Terra Nova National Park.

<sup>&</sup>lt;sup>17</sup> The EA intranet site can be accessed from the left hand menu through the following path: Our Work > Natural Resource Conservation Branch > Environmental Assessment

#### **Appendix 1 - Project Description Template**

Use this template to prepare a comprehensive description of a proposed project. Provide clear concise information as it will help determine the need for an environmental impact analysis (EIA). A well prepared project description will help move the project proposal forward efficiently. The level of detail should match the complexity of the proposed project and its potential to generate impacts of concern. Please include available designs and site photos.

If you have questions or need help contact the Parks Canada Impact Assessment Officer at the site where you are proposing work.

Project Title:						
Project Contact(s) (contact information for proponent, project manager, and contractors):						
Date of Request (y/m/d): Proposed Project Start (y/m/d):						
PROJECT DESCRIPTION (to be completed by proponent)						
<b>Project objective:</b> Provide a brief description of the project elements & related activities or developments needed to support the project (e.g. construction of a yurt, vegetation clearing, new outhouses, trenching for utilities).						
Project rationale (optional): Provide a brief rationale for project (e.g. to support visitor experience objectives, improve public safety, implement actions from the park management plan, etc.).						
Project location: Describe site location & size, include locations of any off-site requirements (e.g. for staging materials, excavating a borrow pit, etc.)						
Primary location:						
Footprint size:						
Off-site location(s):						
Footprint size:						

Project phases and activities: i.e. "how the project will be completed" - through the site preparation, construction, operation and decommissioning phases. The Project Phases & Activities Table on the next page can help organize the information. Include: Site preparation/access activities Dimensions of structures, size of excavation, area of disturbance, fill requirements Construction activities, methods, materials, equipment to be used Associated project work (e.g., paving, vegetation removal, excavation, etc.) Changes to utilities, capacity or demand, new lines (i.e. water, electric, natural gas, wastewater) Toxic or hazardous materials (e.g. cast in place concrete, chemicals, fuels, paints, solvents, explosives) Operational requirements: (materials, maintenance procedures, monitoring, waste & wastewater management requirements) Site modifications, structure removals, site reclamation activities Plans & drawings attached. **Project Environment:** Other facilities that may be affected: Site history (previous use, contamination, buried tanks, lines, cables): Known cultural resources (e.g. buildings, engineering works, landscapes and landscape features, historical and archaeological objects): Distance to nearest water body, water crossings, shoreline work: Fish and fish habitat: Species at risk, critical habitat, and residence of individuals (if any): Other wildlife species and habitat: Site photos or map attached: Red flags/ issues:



### **Project Phases and Activities Table**

Use this table to help identify phases of your project and associated activities.

-	Phases	Examples of Associated Activities	Y/N	Details
	Construction / Site Preparation	Supply and storage of materials		
		Burning		
		Clearing		
		Demolition		
		Disposal of waste		
		Blasting/ Drilling		
		Dredging		
		Drainage		
		Excavation		
		Grading		
		Backfilling		
Suts	truci	Use of machinery		
nodi	Cons	Transport of materials/equipment		
Project Components		Building of fire breaks		
oject 		Use of Chemicals		
ڇ		Set up of temporary facilities		
		Other		
		Waste disposal		
		Wastewater disposal		
		Maintenance		
	Operation/Implementation Decommissioning	Use		
		Use/Removal of temporary facilities		
		Use of Chemicals		
		Active fire stage		
		Clean-up of prescribed burn		
		Planting		
		Culling		
		Vehicle Traffic		
		Other		

### Appendix 2 – Guidance for Determining Application of the Detailed Impact Analysis (DIA) Pathway

The following criteria are intended to guide the Field Unit Superintendent, Director of a Waterway, and Associate VP, Asset Management and Project Delivery in considering whether a proposed project should be required to undergo a DIA. The list indicates the types of projects and potential adverse effects that may warrant a DIA; however, it is recognized that each decision will be based on a range of project and site-specific considerations. *Note: this list was developed to provide guidance for national parks and historic sites, and may be expanded to better reflect potential projects and activities within national marine conservation areas.* 

- Projects involving expansion of community growth limits or boundaries, new or expanded leasehold or license of occupation boundaries, or other important changes to land use tenures or agreements that are not consistent with or approved in existing community plans
- Projects involving expansion of regional or community power supply, new or expanded rights-of-way, power-lines, pipelines
  or other regional utilities infrastructure
- Plans or projects for new development, expansion, or substantive changes in use associated with resorts and accommodation, campgrounds, golf courses, ski areas, waterfronts and marinas, and other outdoor recreation facilities
- Projects likely to result in the substantive alteration of water level, flow or management regime in a water body, or result in other important changes to surface or groundwater resources
- Projects involving new or expanded roads, including operational service or access roads or crossing structures
- Projects involving the permanent and substantive modification or reconfiguration of terrain within alpine, riparian, wetland or aquatic environments, in unstable terrain or other sensitive environments
- · Projects likely to alter ecosystem level composition, structure or process resulting in the impairment of ecosystem function
- Projects that threaten the continued persistence of a native species population, either directly or through the alteration of habitat
- Projects likely to change the nature and experience of unique, iconic or otherwise valued components characteristic of wilderness, the natural environment, or the historical and cultural significance of a protected heritage place
- Projects in which effects to cultural resources may include changes to character-defining elements that convey heritage value, such that the resource is either clearly modified or totally altered, removed, or destroyed
- Projects likely to adversely affect ecological or natural values or the sustainability of environmental resources of another jurisdiction
- Projects likely to result in significant interest or controversy among members of the public, stakeholder or Indigenous peoples
  related to potential adverse effects on natural or cultural resources or components of the environment critical to key visitor
  experience objectives