

Submission

Concerning

**The Request for a
Regional Assessment of the
St. Lawrence River Area**

**Submitted to the
Impact Assessment Agency of Canada**

April 5, 2021

Context – Request to the Minister for a regional assessment of the St. Lawrence River

Pursuant to sections 92 and 93 of the *Impact Assessment Act* (IAA), the Mohawk Council of Kahnawà:ke (MCK) made a formal request on July 29, 2020, for a Regional Impact Assessment (RIA) of the St. Lawrence River. The MCK is the governing body of Kahnawà:ke, a Mohawk community located on the south shore of the St. Lawrence River, across from the Island of Montreal.

Over the past seven years, the MCK has been involved in numerous consultations on project environmental assessments and strategies, policy reviews and amendments to federal and provincial legislation. Through these processes, the MCK has repeatedly stressed the need for a more comprehensive regional approach to assessing the potential impacts and ramifications of projects and government decisions concerning the St. Lawrence River.

We agree with the arguments made by this First Nations community. We too wish to return to development in harmony with nature. In the past, the St. Lawrence River, including its wetlands and many of its tributaries, provided First Nations and newcomers with access to abundant fish and game stocks. The air, water and land were clean. This watershed provided a livelihood for all.

Encroachment on the floodplains of the St. Lawrence River has resulted in the degradation, elimination and fragmentation of wetlands that are important for maintaining ecosystem function and biodiversity. Wetlands filter and conserve water that would otherwise pollute and flood downstream areas. They also serve as nurseries for fish, waterfowl, amphibians and reptiles. The loss of submerged and emergent vegetation in wetlands has resulted in a decline in the populations of animals that depend on wetlands for food and habitat. This is a tragedy!

Since the 1950s, ecological damage to the St. Lawrence River has increased dramatically, with changes to the river's flow pattern, degradation of water quality, denaturalization and erosion of the shoreline, resulting in a substantial decrease in plant and animal populations. There has been extensive excavation and shoreline modification for navigation, erosion control and industrial development. In the 20th century, more than 175 million cubic metres were dredged and discharged into the river. Dredging for channel and harbour maintenance and expansion continues. Sediment from dredging activities has damaged seagrass beds and other fish habitats. How far will this development-at-all-costs madness go? This industrial-development-at-all-costs approach makes nature, as well as human health, an afterthought.

Many existing and proposed projects along the St. Lawrence River limit our ability to live in harmony with the river because of their impact on water, wetlands and the aquatic ecosystem. These activities include urban development, agricultural and industrial activities, bridge construction and repair, port expansion, channel maintenance, and other activities associated with the shipping industry.

Our responsibilities with regard to the river require us to carefully assess the regional and global impacts of projects. We must also consider the cumulative effects of unchecked development, particularly in Montreal and Quebec City, where the intensity of development has been so high that people have turned their backs on the river. What is the St. Lawrence River's ability to handle new development? No one knows, but nature is raising the alarm, and we need to heed it. Wetlands are disappearing as well as certain living species. Pollution is coming between us and the river, and this ecosystem is significantly deteriorating. And yet, it is our source of drinking water.

Accès Saint-Laurent Beauport and Table citoyenne du littoral Est

Known since the mid-1980s as the Association pour la sauvegarde de la baie de Beauport, renamed Accès Saint-Laurent Beauport (ASLB) in 2004, our non-profit organization is a group of community members and organizations working together to promote the quality of life of the entire southern sector of Beauport through the sustainable development of its shoreline in the area between the Beauport peninsula (bay) and Montmorency Falls.

Our organization has joined forces with Table citoyenne du littoral Est to work on implementing its vision. This group wishes to reclaim waterfront territory contaminated by companies polluting the confluence of the St. Charles River and the St. Lawrence River and transform this industrial area into a high-quality community space for and by local residents in keeping with true sustainable development principles.

History of the area

The banks of the St. Lawrence River between the mouths of the St. Charles River and the Montmorency River have particular geomorphic features that make the location attractive to industry. Because of its gradual slope, a vast mudflat is uncovered at low tide between the St. Charles River and Montmorency Falls. The shoreline extends an average of 1,000 metres farther at low tide than at high tide. Significant intertidal vegetation grows there, relying on the two complete cycles of tides each day. It is a rich marine environment.

However, many entrepreneurs fail to consider the environment and focus only on opportunities to develop new land by filling in this shallow area of the river. This type of vision, where the lure of profit prevails over everything else, has disastrous consequences on the environment and has negative impacts on nature, flora, birds, fish and local residents.

The first transportation infrastructure on the Beauport flats was built at the end of the 19th century, and it has expanded progressively in the years since. First came the railroad to Ste-Anne-de-Beaupré, then Ste-Anne Boulevard, the Beauport harbour

peninsula and finally, the most significant infill took place during the construction of the Dufferin-Montmorency highway.

Similarly, in the late 1920s, the Anglo Pulp paper mill was established by filling in the estuary of the St. Charles River. Each of these economic developments was achieved by filling in the river and destroying nature for the benefit of large foreign companies. This is ecocide! When will environmental destruction on such a massive scale be stopped?

To top it all off, in 2020, there is growing pressure to expand the Port of Quebec (Laurentia), and a multinational Hong Kong company, closely associated with China, wants to destroy part of the ecosystem of the Beauport flats. Let's hope that the Government of Canada will put a stop to this constant carnage. The current environmental assessment highlights the significant, direct and cumulative negative impacts on fish habitat, air quality and human health. Will the striped bass, an extinct and then re-established species, survive this new industrial assault?

Significant and cumulative negative effects are taking their toll. When will we stop this destructive approach? Enough is enough! To make matters worse, the Port of Quebec wishes to pursue its development at Pointe de la Martinière in Lévis, near heritage sites such as Île d'Orléans and the village of Beaumont. It should be noted that the Port of Québec has made an offer to purchase the land formerly earmarked for the contested and undesirable Rabaska project, which is located in an urban area. When will the federal government start planning port development outside of cities and in locations that minimize the destruction of natural environments?

Photo 1: Limoilou shoreline (1950s)



Photo 2: Infill of the Beauport harbour peninsula (1960s)



Urban planning trends

Why pursue port development within city limits? Why does the Port of Quebec so desperately want to expand? Several urban planners and the mayor of Quebec City have said that the trend in urban planning in the Western world for years has been to free up the waterfront. Mayors of big cities, such as Toronto, Chicago, Bordeaux and Milwaukee, have freed up the waterfront and convinced industries to move elsewhere, because an open waterfront increases a city's attractiveness. Régis Labeaume, Mayor of Quebec City, said as much at a city council meeting on November 18, 2013.

Port development trends

On a global scale, the International Association of Cities and Ports (AIVP) has also taken an interest in this issue. As early as the 1990s, studies were published on international trends in port development. They showed that new terminals can be developed outside cities. It is up to the higher levels of government to provide direction in this regard, as mayors have difficulty asserting their interests against port authorities.

According to a landmark 1997 study published by Éditions Villes & Territoires on how cities and ports have changed, entitled "Ville et port; mutation et recomposition," streamlining ports, expanding spaces and relocating port facilities outside cities, farther and farther from the original "port core," is not a new phenomenon. In 1963, James Bird used the example of British estuary ports to model these developments, which can be traced back to the industrial revolution. However, starting in the 1960s, the speed and scale of technical and economic changes accelerated the process of developing new spaces for port purposes and raised the question of repurposing old facilities in urban environments.

According to Grégoire Juès of the University of Paris, when almost all port handling activities and investments are concentrated at new, remote sites, the logical result is that port facilities within the city lose prominence. Most old facilities will be neglected or even abandoned over time. This phenomenon is quite common, and it was modelled by J. Bird as well, showing a final phase where ports withdraw from cities or are abandoned.

Even if the port develops, the city may not reap the benefits (economic, social, etc.), as the new port activities are taking place farther away: the port and the city become increasingly separate.

Many authors have noted that this separation is sometimes accompanied by an institutional division. The ports tend to become national gateways, while the cities focus on local and regional development. These cities may have been established as port cities, but today their harbours are no longer the sole driver of economic development: they are but one of many.

André Vigarié, the founder of port and marine geography, has long noted that cities are also undergoing major changes: economic diversification, more service-level jobs, a new role in the regional economy, urban sprawl, etc. In this context, cities are no longer as dependent on the maritime sector (leading harbour cities to shift away from their ports), and matters involving the port are considered separately, with the port becoming independent and using its own strategies. In Europe, cities also seem to pay little attention to the interaction between the city and the port, where the industrial image of the port is outdated and clashes with the city's aspirations to be seen as a modern, continental, service-oriented metropolis.

Vision for the eastern shoreline – Governance – Biodiversity – Housing – Mixed use – Mobility

In its plans for transforming the waterfront land of Limoilou (Maizerets) and Beauport (Giffard), the Table citoyenne du littoral Est wants to include a formal structure where citizens can participate in all decision-making processes. Any human intervention and development should strengthen and regenerate land and water ecosystems, including flora, fauna, soil and watersheds.

This vision presents a unique opportunity to create housing that meets the needs of local citizens, including families, seniors and low-income households.

In order to ensure that residents have access to everything they need within walking distance, the development will integrate features of daily living, including wildlife habitats, a permaculture and agro-forestry network, areas dedicated to urban agriculture, housing, local businesses (artisans and farmers' markets), public services (health, education, knowledge, culture, etc.), public spaces, community workshops and waste recovery sites.

Because the area is centrally located and already integrated with the public transportation network, all developments will be pedestrian-friendly and connected to the city and the region by a public transportation system. The project will integrate an extensive cycling network and access to the transit network will be no more than 800 m (10 minutes) away on foot.

Questions raised by the Canada Impact Assessment Agency

Is a regional assessment of the St. Lawrence River required?

YES. Increased shipping and industrial activity in the Quebec City area has resulted in negative and cumulative effects, which interfere with nature conservation and protection, human health, air quality and the quality of life in nearby communities. Other issues, such as leisure and recreational access to the river and the community's right to decide on the future of its environment, are also at stake. This observation also applies to the **Pointe de la Martinière area in Lévis** and the **Anse-aux-Foulons area in Sillery**. In Quebec City, unfortunately, port terminals are located in urban areas by necessity, which affects local residents, despite the fact that land use planning trends worldwide are shifting toward quality of life and green spaces in urban areas.

Furthermore, individual impact assessments are not effective in addressing these issues. The negative and cumulative effects of industrial projects in our region taken as a whole are detrimental to nature and the quality of life of citizens. Some projects have not even been assessed because they are so old. Regional assessments are needed to understand the current state of the river and to clearly identify which environments need to be protected or restored and which can be developed, should the need arise. The poor water quality must also be addressed in a comprehensive manner, given the multiple sources of pollution (large cities, villages, agricultural activities, etc.).

Industrial project after industrial project are approved, without citizens having the opportunity to stand up for their right to quality of life. In general, these projects are located in areas where residents are socio-economically less well off, such as in Beauport-Limoilou and Hochelaga-Maisonneuve. We need a well-defined vision, greater integration of the entire ecosystem and clear guidelines for protecting the river and its development: otherwise, multinational companies and industrialists will decide for us.

We therefore fully support the request the MCK made to the Minister of the Environment and Climate Change of Canada.

What should the scope of this assessment be?

The regional assessment should include the St. Lawrence River and estuary to give a more complete perspective on the development potential of the port, knowing that industrialists will want to continue developing in urban areas to take advantage of common services and the available workforce. A business model similar to that of the Port of Prince Rupert, located 800 km from Vancouver, or the NOVAPORTE project in

Sydney, Nova Scotia (300 km from Halifax), should be considered in the case at hand, for port development downstream of the Saguenay Marine Park.

What could be the objectives and expected results of this regional assessment?

In short, concretely and locally, our organizations expect the regional assessment to provide an overall vision for protecting the river and developing its industry by shifting port development outside city limits. That way, port authorities will be able to pursue their development without impacting local urban communities. As for the Beauport Bay and Pointe-De-la-Martinière sectors, they will be protected from industrial development and will be granted marine protected area status.

In addition, an ambitious plan for urban transformation and shoreline reclassification along Beauport Bay and at the mouth of the St. Charles River could be undertaken by the local community. Decontaminating the land and restoring natural riverbanks would make it possible to build a new district where it would be nice to live. The stranglehold the Port and its multinational partners have on this land will then be a thing of the past.

We are convinced that the MCK and many organizations that want to improve the state of the river will adhere to this assessment, protection, restoration and development strategy that is more respectful of nature.

Objectives	Results
Compile and provide regional information	<ul style="list-style-type: none">• Inventory of existing Indigenous and local community knowledge, scientific data and economic information.• Description of existing environmental, social and economic conditions.
Identify impacts and define mitigation measures and development alternatives	<ul style="list-style-type: none">• Description of potential environmental, health, social or economic effects (positive or negative) that may result from future development (including cumulative effects).

Identify impacts and define mitigation measures and development alternatives (cont'd)	<ul style="list-style-type: none"> • Description and analysis of ecological and socio-economic components and issues that should be considered in regulatory and planning processes. • Recommendations for non-project-specific actions to address regional issues (e.g., a government vision, guideline, policy or plan). • Identification of alternative locations outside of urban areas that are conducive to port development and prosperity in remote regions (e.g., Port of Prince Rupert, BC, or NovaPorte, Sydney, NS).
Provide regional context for future development and assessment	<ul style="list-style-type: none"> • Analysis of past, planned and upcoming developments in the region (including possible scenarios). • Understanding of the regional context that can be used as a framework for considering and assessing the effects of future activities (particularly the cumulative effects).

Does the Minister of Environment and Climate Change have to say YES to the assessment request?

Canada must be proactive and move quickly to change its economic development policies and directions in order to stop the destruction of nature and environmental degradation. Canada must play a leadership role and be a role model for its citizens and for other countries.

This is all the more important, given that on March 11, 2021, the member states of the United Nations adopted a new statistical framework that takes the contributions of nature into account in measuring economic prosperity and human well-being.

“This is a historic step forward towards transforming how we view and value nature”, UN Secretary-General António Guterres said. “We will no longer be heedlessly allowing environmental destruction and degradation to be considered economic progress.”

The new economic and environmental statistical framework was adopted by the nations gathered at the United Nations Statistical Commission. It is expected to reshape decisions and policies on sustainable development and climate action. The new

framework, called the System of Environmental-Economic Accounting – Ecosystem Accounting, will ensure that natural capital, such as forests, wetlands and other ecosystems, are recognized in economic reporting.

Finally, in a new post-pandemic economic context, Canada and Quebec must reflect on their new economic policies and integrate new principles such as respect for nature, responsible consumption, buying local, greater self-sufficiency in producing certain essential goods and less foreign dependence. These new considerations, coupled with China's ambition to become the world's leading power by 2040 and its difficult relationship with the United States and some other countries, require greater economic autonomy. As a result, the growth in demand for international shipping will be significantly lower.

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