Eliminate Shoreline Work Permitting Red Tape and Bureaucracy

A solution for some cases where expedited emergency Shoreline Protection Work Permits are needed

DAVE DINGLE, CHAIR, HISTORIC MURRAY CANAL DISTRICT
Work Done

7 HMCD Group Meetings (Jan. 4 to Mar. 15, 2020) - see www.MurrayCanalDistrict.ca
7 Conference calls and meetings with W.F. Baird & Associates Coastal Engineers Ltd. to develop and act on red tape reduction ideas (Jan. 20 to April 13, 2020) - Led to letter of opinion & LTC permit on Apr. 22, 2020
change.org petition: “Remove red tape barriers to protecting shoreline property from Lake Ontario spring floods” - Jan. 7, 2020 - Now has over 500 signatures
2 Conference calls with Wood Plc., followed by a letter on red tape reduction strategies and summaries to Conservation Authorities Jan. 15, 2020
HMCD Delegation Met CAO’s of LTRCA and Quinte CA. on Jan 22, 2020
HMCD Presentation at United Shorelines Brighton Flood Talk Meeting - Jan. 23, 2020
HMCD Delegation at Brighton Municipal Council Meeting - Flood Mitigation expert motion passed - Feb. 18, 2020
LTC/Quinte CA Conference calls to craft revised motion, with input from Baird
HMCD - Revised Motion presented as Community Input to LTC Board - Mar. 12, 2020 - Motion 'referred to staff'
HMCD - Deferred further action on our Motion & advised our members to individually approach their Conservation Authorities for emergency expedited permitting requests. Mar. 15, 2020
Engaged Baird to write a Letter of Opinion for three adjacent properties without visiting the sites. Mar. 18, 2020
Baird Letter of opinion received Apr. 7, 2020
LTC - Agreed to issue 2 permits Apr. 8, 2020
LTC - Issued permits - Apr. 22, 2020
We proved there could be a significant number of cases where Conservation Authority requirements for a coastal engineer review/design may not be needed for a permit to be issued. This is contrary to current CA policy.

We demonstrated a Coastal Eng. Letter of Opinion at 10% to 20% of the cost of a review/design will suffice in some of those cases.

We demonstrated property-owner imagery may be sufficient in these cases without a site visit by the engineer. (Note: There are many cases where this approach will not work, due to complexity and nature of the conditions on a given property.)

We are now offering to assist other property owners to follow the same approach as a first step to engaging with coastal engineering consultants.

Next steps will be to identify other cases where the same approach may work.

Much more must be done to reduce costs, delays, and to preserve precious engineering resources for the cases where they are truly necessary.

Telemedicine for Coastal Engineering: We now will advocate for crowd-sourced, citizen led data to be routinely used, as much as possible to facilitate Letters of Opinion and also, in the longer run to provide possibly all needed input for remote Coast Engineering design (via drones, LIDAR sensors and other image processing that is commonly available and in the hands of citizenry).
Our Solution for Some Limited Cases May Apply to Other Cases and Points to Urgently Needed Policy Changes

Engineering Letters of Opinion should be encouraged as a first step in the CA permitting process for flood mitigation and other shoreline work. They may be sufficient in limited but common cases. They are far cheaper, take far less time, and can be done without onsite visits by coastal engineers. Limitations and caveats on this approach are explained on the next page of this presentation.

Property owner or citizen supplied imagery may be sufficient in these cases.

Much more could be done using this approach, and is being done in other parts of the world.
Limitations

The Letter of Opinion in our test case was provided without an engineer visiting the site because of two very specific conditions: (1) The proposed works were all behind an existing revetment. (2) The owner had previously installed a section of the proposed fix to the erosion and it had performed well.

There are probably other properties that meet similar criteria. Many would not.

The Letter of Opinion is not about providing a design.

The solution the property owner is seeking should have little to no impact on the nearshore area (no blocking sediment, causing wave reflections, etc.)

The letter of opinion should pertain to solutions that use methods that are either proven to work at the site, or very standard approaches used in a similar way nearby.