

## Attachment 2: Provincial Comment Table for the Georgina Island Fixed Link Project – Draft Initial Project Description (IPD)

### Draft IPD submitted by the Chippewas of Georgina Island First Nation (the Proponent)

Use this document to provide comments on the Georgina Island Fixed Link Project (the Project). The document consists of two tables:

- **Table 1** will enable you to describe potential project effects.<sup>1</sup> The Impact Assessment Agency of Canada (the Agency) requests detailed advice to assist the Agency in understanding whether the proponent has adequately characterized potential adverse effects of the Project and to improve the proponent’s Initial Project Description before a formal submission. Refer to prompts in the table to guide your responses.
- **Table 2** will facilitate the collection of general or editorial comments.

*Table 1: Description of the potential effects of the Project*

Comment ID	Document Reference	Valued Component	Project Component	Description of the Potential Effect (Context and Rationale)	Powers, Duties and Functions	Instructions to the Proponent
1	Part E: Potential Effects of the Project—Dust and Other Contaminants—Air and Noise Emissions—Pg. 45-47	Environment: Air quality (dust emissions)	Construction	<p>The effects of the construction phase fugitive dust emissions have been adequately described in Table 2.</p> <p>The mitigation measures for the air emissions have been adequately illustrated in Table 2. As noted in Table 2, existing air quality assessments will be performed and a fugitive dust Best Management Practice Plan (BMPP) will be developed.</p>		<p>The “Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities” (Cheminfo Services Inc., 2005) document provides several mitigation measures for reducing emissions during construction activities. It is recommended that these best management practices be followed during construction to reduce any air quality impacts that may occur.</p> <p>If a dust monitoring program will be considered to determine the effectiveness of the fugitive dust mitigation measures, it is suggested that the “Operations Manual for Air Quality Monitoring in Ontario” (MECP, 2018) be followed.</p>
2	23. An estimate of any greenhouse gas emissions associated with the project—pg. 52-54	Environment: Air quality (greenhouse gas emissions)	Operational phase	<p>The proponent has adequately articulated the GHG effects of the project. Table 5 lists a breakdown of GHG air emissions by project alternatives.</p> <p>The planning stage considerations for reducing GHG emissions have been illustrated on page 54.</p> <p>The proposed bridge/causeway option is anticipated to result in a decrease of 15% in GHG emissions annually when compared to current operations of the Ferry.</p>		No additional comments.
3	Part E: Potential Effects of the Project –Table 2: List of Established and Effective Mitigation Measures— references to water quality and quantity— pg. 40-49	Environment: Water quality and quantity, aquatic habitat, protection of natural resources	Construction	<p>It is understood that the project is in its initial stages of development and detailed geotechnical and hydrogeological studies have not been completed. The Project Team briefly acknowledges the potential to require a Permit to Take Water (PTTW) prior to construction in the “Draft GIFN Project Plan” (Appendix D, Draft Project Schedule, WSP Report, November 13, 2020). Further studies will be necessary to support any PTTW applications. The Project Team will need to determine dewatering rates for any portion of construction (discussed in “Draft GIFN Project Plan”, Table 2, Dewatering Analysis).</p>	Water takings that exceed 50,000 litres per day must be carried out in compliance with the conditions for registration on the Environmental Activity and Sector Registry (EASR) under the <i>Environmental Protection Act</i> or a Permit to Take Water (PTTW) issued by MECP under the <i>Ontario Water Resources Act</i> ,	<p>Additional investigations, such as geotechnical and hydrogeology studies, will be required, especially where it is identified that construction dewatering is required. MECP may be further involved in the detailed review during the PTTW application process</p> <p>As part of a PTTW application, MECP may require the following, where applicable:</p> <ul style="list-style-type: none"> <li>• Completion of a door-to-door water well survey prior to the start of construction to determine if there are any water wells that may be affected by construction activities and to determine baseline groundwater level and groundwater quality conditions.</li> <li>• If wells are identified, the proponent should create and implement a monitoring and mitigation program to predict</li> </ul>

<sup>1</sup> *effects* in this context means changes to the environment or to health, social or economic conditions and the positive and negative consequences of these changes.

			<p><b>Groundwater</b> A review of the Source Protection Information Atlas indicates that the mainland portion of the project lies with the Lakes Simcoe and Couchiching/Black River Source Protection Area. Additionally, portions of the area are underlain by highly vulnerable aquifers and significant groundwater recharge areas.</p> <p>Potential changes to groundwater quantity and/or quality due to the following should be considered and appropriate mitigation measures be developed:</p> <ul style="list-style-type: none"> <li>• materials and equipment, handling of solids and liquids</li> <li>• clearing of vegetation that may affect recharge</li> <li>• excavations for foundations and dewatering of the excavations</li> <li>• disturbing shallow soils with pre-existing contamination</li> <li>• hardening of surfaces e.g. road construction, sidewalks, etc.</li> </ul> <p><b>Surface water</b> Dewatering may impact baseflow to surrounding surface water features, particularly local wetlands/marshes. This impact must be assessed, and site-specific monitoring/mitigation plans will be required. Additionally, dewatering effluent management, including treatment and discharge plans, will be needed.</p>	<p>where applicable within the Project Area.</p> <p>Contaminated soils and waste generated during construction must be disposed of in accordance with Ontario Regulation 347, entitled “General—Waste Management” and the <i>Environmental Protection Act</i>.</p> <p>Activities involving the management of excess soil shall be completed in accordance with Ontario Regulation 406/19, On-Site and Excess Soil Management, and MECP’s current guidance document, “Management of Excess Soil—A Guide for Best Management Practices” (2014).</p> <p>An Environmental Compliance Approval issued under the <i>Environmental Protection Act</i> may be required.</p>	<p>and/or confirm effects on water wells during construction and outline a response should these wells become affected by construction activities.</p> <ul style="list-style-type: none"> <li>• Assessment of the potential effects of dewatering and construction-related activities (i.e. changes to groundwater flow or quality) and their effect on groundwater dependent natural features.</li> <li>• Estimation of the radius of influence of dewatering activities and an assessment that discusses potential impacts of the construction activities on the natural environment (including surface water features, wetlands, etc.), nearby structures due to ground settlement resulting from construction dewatering, and the potential for the movement of contaminated groundwater during construction dewatering activities.</li> <li>• Detail the planned disposal method for the water taken under the PTTW and how the water quality discharged from the excavations will meet the water quality criteria for the chosen method of disposal. Appropriate mitigation measures should be developed. The level of detail required will be dependent on the significance of the potential impacts.</li> </ul> <p>The development of the following plans should be considered:</p> <ul style="list-style-type: none"> <li>• Plans to guide the handling, management and disposal of groundwater encountered during site work and dewatering, which should include, but not be limited to, plans for encountering productive water bearing zones, mitigating potential impacts to surface water and groundwater users, and groundwater monitoring plans (discussed in Table 2: List of Established and Effective Mitigation Measures).</li> <li>• Plans to guide the handling, management and disposal of potentially contaminated soil, rock and other waste encountered during site activities.</li> <li>• Environmental mitigation and monitoring plans to ensure construction is undertaken in compliance with applicable environmental approvals, commitments, and obligations.</li> <li>• Spill prevention and response plans to minimize impacts to wetlands, watercourses and groundwater that may occur through accidental leaks or spills from construction equipment. (Spills Management Plan included in Table 2: List of Established and Effective Mitigation Measures). See Comment 4 for additional details.</li> </ul> <p>Please refer to MECP’s “Technical Guidance Document for Hydrogeological Studies in Support of Category 3 Applications” for additional information: <a href="https://www.ontario.ca/page/technical-guidance-document-hydrogeological-studies-support-category-3-applications">https://www.ontario.ca/page/technical-guidance-document-hydrogeological-studies-support-category-3-applications</a></p>
--	--	--	---	---	--

4	Part E: Potential Effects of the Project— Table 2: List of Established and Effective Mitigation Measures— References to Erosion and Sediment Control Plan(s) and Spill Management Plan(s)—pg. 40-45	Environment: Water quality and quantity, aquatic habitat, protection of natural resources	Construction	<p>Project Team acknowledges the need/importance of Erosion and Sediment Control Plan(s) (ESC) and Spill Management Plan(s). However, they have deferred details to future study phases. MECP emphasizes that this is a major component of this undertaking.</p> <p>Given that the bulk of construction will be near water/in-water, MECP emphasizes the importance of developing standardized plan(s) at an early stage given the complexity of this undertaking, the sensitivities of the receiving environment(s), and the importance of various natural resources to local communities.</p> <p>Preparing comprehensive and site-specific ESC/Spill Management plans in advance of any construction will ensure that all future contractors are aware of the various sensitive receivers and their importance both environmentally and socially, potential impacts, mitigation requirements, contingency measures, and monitoring measures that will be necessary to carry out this undertaking safely.</p>	<p><i>Environmental Protection Act</i>, 1990 (EPA)</p> <p>The EPA [Part X, section 92] defines and imposes specific duties on anyone causing a spill or having control of a spilled pollutant into the natural environment.</p> <p>MECP must be notified when a solid, liquid and/or gaseous material has been released to the outside environment (i.e. outside of a building) and causes, or has the potential to cause, an adverse effect.</p>	<p>MECP recommends that the Project Team develop robust Erosion/Sediment Control and Spill Management Plans. The Plans must outline the use of various industry best management practices that may be employed, a monitoring/inspection plan by way of Environmental Inspector(s) and contractors, and adaptable mitigation measures to reduce construction impacts.</p>
5	Part E: Potential Effects of the Project –Table 2: List of Established and Effective Mitigation Measures— References to Stormwater Management —pg. 40-45	Environment: water quantity and quality, aquatic habitat, protection of natural resources	Construction, post-construction/permanent infrastructure	<p>The Project Team acknowledges that stormwater management plans (SWMP) will be developed but have deferred details to future study phases.</p> <p>MECP understands that the project is still at a conceptual design stage; however, future Project documents will require the proponent to commit to Enhanced Level 1 Treatment and provide preliminary assessment(s) as to how the proponent may achieve this undertaking. It is understood that more detailed site assessments will be carried out to support future SWM applications.</p>	<p><i>Ontario Water Resources Act</i> if PTTW is required</p> <p>MECP’s Stormwater Management Planning and Design Manual (2003)</p>	<p>Please refer to MECP’s Stormwater Management Planning and Design Manual (2003) for detailed guidance.</p> <p>Key aspects of SWMPs include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• To maintain the hydrologic cycle: A common approach to maintaining the hydrologic cycle is to specify that post-development infiltration must be equal to the pre-development infiltration.</li> <li>• To prevent an increased risk of flooding: It is usually specified that maximum peak flows (or volumes per unit time) must not exceed predevelopment values for large storms. Large storms include the 2, 5, 10, 25, and 100-year storms.</li> <li>• To prevent undesirable stream/receiving environment erosion: Controlling the runoff from the natural storms and increased impervious pavement that may cause erosive flows as to protects stream channels and the habitat they provide.</li> <li>• To protect water quality: The criterion for quality is usually expressed in terms of the percentage of suspended solids/sediment which must be removed from stormwater to protect aquatic life. For example, 80% or better removal (also referred to as Enhanced Level One Protection) may be required for sensitive aquatic habitats.</li> </ul> <p>Consultation with MECP and reference to MECP guidelines should be included in Table 2 under the “Drainage” section (Pg. 32-33 of WSP report, pg. 399-400 of full Project Description), as recommended in the “Draft GFN Project Plan” prepared by WSP, November 13, 2020.</p>

6	<p>14. A brief description of the physical and biological environment of the project's location—pg. 30-31</p> <p>Part E: Potential Effects of the Project (pg. 41)</p> <p>Table 2 – Listing of Constraints—pg. 396</p>	Environment: Species at Risk	Construction and operational phases	<p>Potential effects on species at risk have been identified in Part E: Potential Effects of the Project with a note that additional consultation with DFO, MECP and LSRCA will occur during future study phases. Table 2: Listing of Constraints within the “Draft GIFN Project Plan” recommends additional SAR habitat assessment and ecological surveys within the study area according to accepted seasonal timing windows and protocols and to consult with MECP early in the process.</p>	The <i>Endangered Species Act</i> , 2007	<p>The <i>Endangered Species Act</i>, 2007 prohibits activities that would kill, harm, or harass, and/or damage or destroy habitat of species listed under O. Reg. 230/08 as extirpated, endangered, or threatened in Ontario. It is a proponent's responsibility to determine if their planned activity(s) will have adverse impacts on SAR protected under the ESA and/or its habitat. If a proposed activity will impact SAR and/or its habitat (i.e., the activity may contravene subsection 9(1) and/or 10(1) of the ESA), an authorization under the ESA would be required in order to proceed with the activity and be in compliance with that Act.</p> <p>MECP affirms that MECP's Species at Risk Branch (SARB) should be consulted early in the planning process and during future study phases. SARB can be contacted via SAROntario@ontario.ca.</p>
7	Part E: Potential Effects of the Project—Impacts to Areas of Natural and Scientific Interest—pg. 48	Environment: Provincial Parks	Construction and operational phases	<p>The Project Description states that “the preferred route will avoid construction activities from occurring within the limits of Sibbald Point Provincial Park”.</p> <p>However, given the report identifies that the preferred route would be located within a 5-minute drive on the mainland to Sibbald Point Provincial Park, one of the most popular parks in Ontario (70,000 people per year), MECP recommends that the Project Team consider other potential environmental and socio-economic effects (e.g. construction noise effects on wildlife and park users, effects of construction activities on local traffic management and park access, safety concerns, impacts to water quality) and proposed mitigation measures.</p> <p>MECP also notes that the Sibbald Point Provincial Park Management Plan identifies a potential addition to the park's waterfront boundary (identified in Figure 2 and Figure 3 of the <a href="#">Plan</a>). This area should be considered when identifying potential impacts and mitigation measures.</p>		<p>MECP recommends that the Project Team consult with the Park Superintendent and an MECP Parks Planner in the Southeast Parks Zone to assist with the identification of potential impacts and mitigation measures.</p> <ul style="list-style-type: none"> <li>• Park Superintendent: Curt Morris, 905-722-3269, <a href="mailto:curt.morris@ontario.ca">curt.morris@ontario.ca</a></li> <li>• Park Planner: Angela Adkinson, 705-313-3619, <a href="mailto:angela.adkinson@ontario.ca">angela.adkinson@ontario.ca</a></li> </ul>
8	Section 4.7 (Air and Noise) of the “Draft GIFN Project Plan”—pg. 391	Environment: Noise	Construction and operational phases	Section 4.7 (Air and Noise) of the “Draft GIFN Project Plan” identifies that an Air and Noise Study will be required as part of the Fixed Link EA.	An Environmental Compliance Approval issued under the <i>Environmental Protection Act</i> may be required.	The Noise Study should identify and characterize nearby sensitive receptors and discuss potential impacts on these receptors during construction and operation, as well as proposed mitigation measures. Noise control measures should be addressed and included in the construction plans to ensure that nearby residential and other sensitive land uses within the project area are not adversely affected during construction activities.

	Part E: Potential Effects of the Project— Table 2: List of Established and Effective Mitigation Measures – Air and Noise Emissions— pg. 46-47			Part E (Air and Noise Emissions) notes that mobile construction equipment to be used on site for paving must be operated in accordance with a mobile Air and Noise Environmental Compliance Approval and that other construction activities must comply with NPC-115, MECP noise guidelines for construction equipment.	Environmental Noise Guideline – Stationary and Transportation Sources – Approval and Planning (NPC-300)	
9	Municipal and Provincial Engagement – pg. 39  “Draft GIFN Project Plan” - Table 2: Listing of Constraints— pg. 398	Environment: Key natural heritage and hydrologic features	Project planning	The “Draft GIFN Project Plan” identifies that the Project is subject to the Greenbelt Plan and recommends that the proponent consult with the Government of Ontario to determine policy implications. York Region has also identified that the potential ‘landing locations’ are located within the Greenbelt Plan.	Greenbelt Plan (2017)	MECP recommends that the Project Team identify the locations of the Project Area that are subject to the Greenbelt Plan and the applicable land use designations and policies early in the planning process.  For example, Section 4.2.1.2 outlines policies relevant to proposed infrastructure in the Protected Countryside of the Greenbelt: <ul style="list-style-type: none"> <li>• d) New or expanding infrastructure shall avoid key natural heritage features, key hydrologic features or key hydrologic areas unless need has been demonstrated and it has been established that there is no reasonable alternative;</li> <li>• e) Where infrastructure does cross the Natural Heritage System or intrude into or result in the loss of a key natural heritage feature, key hydrologic feature or key hydrologic areas, including related landform features, planning, design and construction practices shall minimize negative impacts on and disturbance of the features or their related functions and, where reasonable, maintain or improve connectivity</li> </ul>
10	“Draft GIFN Project Plan”—LSRCA Meeting Notes— pg.450	Environment: Water quality and quantity	Project planning	The project consultant (WSP) indicates in the meeting notes with LSRCA that the Project Team will consider connecting with the Lake Simcoe Protection Plan Ministry Advisory Committee.	Lake Simcoe Protection Plan, approved under the <i>Lake Simcoe Protection Act, 2008</i> .	MECP recommends that the Project Team review the Lake Simcoe Protection Plan and identify applicable policies (e.g. stormwater management, key natural heritage and hydrologic features, phosphorus loading) early in project planning. The <i>Lake Simcoe Protection Act</i> requires that decisions under the <i>Planning Act</i> or decisions related to a “prescribed instrument” (e.g. PTTW) conform with the applicable designated policies in the Plan and have regard to the other applicable policies.

11	<p>“Draft GIFN Project Plan”—4.5.2 Environmental Site Assessment – Contaminated Soil Investigation —pg. 390</p> <p>Part E: Potential Effects of the Project— Table 2: List of Established and Effective Mitigation Measures – Soil and Groundwater Contamination—pg. 47</p>	Environment: water quality, soil contamination	Construction and operational phases	<p>Section 4.5.2 of the “Draft GIFN Project Plan” documents that the Phase 1 and 2 Environmental Site Assessments that were completed by Neegan Burnside in 1998 and 2000 identified three inactive landfills on the island. WSP’s high-level study recommends the completion of further investigations, including Phase One and Two Environmental Site Assessments to confirm the presence or absence of soil and groundwater contamination within the technically preferred route. If contamination is identified during Environmental Site Assessments, appropriate mitigation would be required.</p> <p>MECP affirms that further investigations are needed and that the locations of any active and inactive landfills in the Project Area (mainland and island) must be identified during project planning.</p>	<p>Contaminated soil and waste generated during construction must be disposed of in accordance with Ontario Regulation 347, entitled “General—Waste Management” and the <i>Environmental Protection Act</i>.</p> <p>Activities involving the management of excess soil shall be completed in accordance with Ontario Regulation 406/19, On-Site and Excess Soil Management, and MECP’s current guidance document, “Management of Excess Soil—A Guide for Best Management Practices” (2014).</p> <p>D-4 Guideline: Land Use On or Near Landfills and Dumps</p>	<p>As indicated in Comment 3, MECP recommends that the Project Team develop contingency plans to guide the handling, management and disposal of contaminated soils encountered during construction.</p> <p><b>Landfills</b> If there are any active and inactive landfills identified within the Project Area, MECP advises the Project Team to review the “D-4 Land Use On or Near Landfills and Dumps” guideline. This guideline specifies restrictions and controls on land use within the vicinity of landfills and dumps, in order to protect the health, safety, convenience and welfare of residents near such facilities. Application of the guideline extends to all proposals for land use on, or near, operating and non-operating landfills, (as defined in O. Reg. 347) and dumps which contain municipal solid waste, industrial solid waste and/or sewage sludges. The guideline applies to all such facilities regardless of ownership.</p> <p>MECP considers the most significant contaminant discharges and visual problems to be normally within 500 metres of the perimeter of a fill area. Accordingly, the Ministry recommends this distance be used as a study area for land use proposals. Ministry staff shall ensure that the proponent has evaluated the presence and impact of any adverse effects or risks to health and safety and that necessary remedial measures are taken when land use proposals are within this distance. This assessment shall be based on the nature and knowledge of the disposal site, and the nature of land use(s) proposed.</p>
----	---	--	-------------------------------------	---	---	--

Table 2: General and editorial comments - include comments such as formatting, layout or grammar

Comment ID	Document Reference	Context and Background	Instructions to Proponent
<b>Example:</b> TC-01	<b>Example:</b> Draft Initial Project Description Part D, section 17 Pg. 11	<b>Example:</b> The proponent has identified the Navigation Protection Act under the list of federal powers, duties, or function; however, the section appears to be inconsistent with changes to the legislation introduced in 2019.	<b>Example:</b> In 2019, the Navigation Protection Act was amended and renamed the Canadian Navigable Waters Act. Ensure that the correct title is used.
1	Part E, Pg. 47, Fifth bullet	The proposed mitigation measure is related to noise but not GHG emissions.	Please address the discrepancies.
2	Draft GIFN Project Plan, Section 5: Potential Environmental Constraints of a Fixed Link, Table 2: Georgina Island Fixed Link— Listing of Constraints, pg. 392	The preceding text indicates that Table 1 provides a preliminary listing of the types of constraints that could occur for the project, but it is labelled as Table 2.	Please address the discrepancies (this may require updates to references to the Table within the text).