

December 30, 2025

IAAC Project Manager File 83539

The Lake Simcoe South Shore Residents Association formal submission post DPD, filing to the Impact Agency of Canada in accordance with Section 16 of the Impact Assessment Act to require an Impact Assessment for the Georgina Island Fixed Link (GIFL) proposal to build a 2.6 km Bridge and Causeway in Lake Simcoe and an 800 m Roadway on federal lands in the Greenbelt between Black River Road and the shoreline. (CIAR # 83539)

The purpose of this Letter is to formally update our request for IAAC to conduct a full, complete and comprehensive Impact assessment of the Georgina Island Fixed Link. We are the Lake Simcoe South Shore Residents Association (“LSSSRA”) “composed of about a thousand members who are very concerned about the updated design of the 2.6 km Fixed Link, a series of a roadway, bridges and causeways in the waters of Lake Simcoe.

On December 15, 2025, the **Detailed Project Plan (DPD)** was submitted to IAAC for the Georgina Island Fixed Link (GIFL). With the signing and announcement of the “**Co-operation Agreement between Ontario and Canada on Environmental and Impact Assessment**” on December 11, 2025, the duty and method was set out for the IAAC and the Ontario Ministry of the Environment, Conservation and Parks (MECP) to perform a joint Environmental Assessment of the Fixed Link proposal (CIAR#83539).

In the preamble to the IAAC Act, it states that “Whereas Parliament recognizes the importance of implementing the impact assessment process in a manner thatsupports coordinated action among jurisdictions that have powers, duties and functions in relation to the assessment of the effects of designated projects, and encourages the use of innovative approaches and technologies to prevent or mitigate adverse effects within federal jurisdiction...” And goes on to say in Section 6 (1) The purpose of this Act is to prevent or mitigate significant adverse effects within federal jurisdiction — and significant direct or incidental adverse effects — that may be caused by the carrying out of designated projects, as well as significant adverse environmental effects, as defined in section 81, that may be caused by the carrying out of projects, as defined in that section, by establishing processes to anticipate, identify and assess the potential effects of those projects in order to inform decision making under this or any other Act of Parliament in respect of those effects.

The definition of a “jurisdiction means

(c) the government of a province; and

(d) any agency or body that is established under an Act of the legislature of a province and that has powers, duties or functions in relation to an assessment of the environmental effects of a designated project.

Of course, the Fixed Link and all its structures are covered within the purpose of the (Ontario) Environmental Protection Act, the Lake Simcoe Protection Act, and the Lake Simcoe Conservation Authority. The Province of Ontario has powers, duties and functions in relation to the assessment of the effects of the Fixed Link, a designated project. The adverse effects and impacts are the exact subject matter all of which will take place in Ontario and require an Ontario Environmental Assessment.

Rather than causing the significant adverse effects, the use of an electric icebreaking ferry is an innovative approach with proven technology that will prevent the adverse effects. The use of the ferry would not even require an Environmental Assessment.

And in Sec 22, “adverse effects within federal jurisdiction means, with respect to a physical activity or a designated project,

(a) a non-negligible adverse change to the following components of the environment that are within the legislative authority of Parliament:

(i) fish and fish habitat, as defined in subsection 2(1) of the Fisheries Act,

(ii) aquatic species, as defined in subsection 2(1) of the Species at Risk Act,

(iii) migratory birds, as defined in subsection 2(1) of the Migratory Birds Convention Act, 1994, and

(iv) any other component of the environment that is set out in Schedule 3”

All of the above (i) through (iv) as well as others including Ontario and foreign residents will suffer adverse effects during construction of the Fixed Link and adverse effects because of the structures proposed to be built in the waters of Lake Simcoe.

We disagree with a number of the representations and note a number of omissions in the DPD. The Baird study to update the 1981 Shoreline Flood Elevation Study of Lake Simcoe, was knowingly and deliberately NOT referenced in the DPD, despite its reference in the May 29, 2022, LSRCA submission to IAAC. The DPD is silent on many of the 36 points in the LSRCA Staff Report dated February 23, 2024 based on the LSRCA staff’s review and concerns of the GIFL project and technical study submissions. The Lake Simcoe Protection Act exists “to protect and restore the ecological health of Lake Simcoe.” We note that the GIFL [Coastal Engineering](#) Report posted on the Fixed Link site on December 2024 is woefully inadequate, with incomplete assumptions, scenarios, scope and facts. The

Ferry Alternative Report was withheld and not included in the DPD or even shared with Georgina Island First Nation residents prior to its submission. Ferry experts and Transport Canada reviews suggest the life of the current Georgina Island Ferry is longer than its stated end-of-life in 2027 as per the DPD. The Proponent is knowingly and deliberately intending to cause irreparable damage to adjacent private, provincial and federal property. Conflicts of interest have not been declared. We disagree that the process has been **“transparent”** or **“fosters mutual respect and trust.”**

In their DPD and answer to the Summary of Issues, in the proposed path of the Fixed Link or adjacent areas to the roadway, bridges and the causeways, the First Nations list and describe the plethora of fish and fish spawning areas, migratory birds and their habitat as well as birds at risk, aquatic creatures such as frogs, toads, crayfish etc. and animals such as deer, racoons, and rabbits etc. Nowhere in the DPD do the First Nations portray the adverse effects of killing, exterminating, and destroying these living creatures, their spawning areas, their habitat for regeneration used for thousands of years; nor lay out and describe mitigation efforts if there are any. They sometimes do write that mitigation is, “to be determined during the detailed engineering phase”. This is not a satisfactory answer.

For example, from Table 12 of the DPD” The south shoreline of Georgina Island is known to contain Muskellunge spawning and nursery habitat as well as Northern Pike spawning habitat (Neegan Burnside Ltd., 2008). The area of the Sand Islands and the south shore of Georgina Island has also been identified as Northern Pike spawning habitat on MNRF fish activity mapping (Government of Ontario, 2022)”.

Is there a mention or description of the adverse effects caused by the Fixed Link? None.

Is there a plan, a strategy, a design or proposal to mitigate the adverse effects? No.

This “No answer” and inadequate answers to the Summary of Issues in the DPD requires the IAAC in accordance with its Act to determine the requirement for an Environmental Assessment.

Now that the Georgina Island First Nation filed their Detailed Project Description (“DPD”), It is now incumbent upon the IAAC and the Ontario Ministry of the Environment to arrange for the joint Environmental Assessment of the Fixed Link. The IAAC should appreciate that the Fixed Link will be built in Ontario’s Greenland protected area, and the causeways and bridges proposed to be built in Lake Simcoe are entirely within Ontario and within Ontario’s jurisdiction. Many Ontario Acts are specific to Lake Simcoe including the Lake Simcoe Protection Act, the Environmental Assessment Act, and of course the establishment of the Lake Simcoe Regional

Conservation Authority (“LSRCA”). As well as so many more Ontario legislations that provide protection and control of Lake Simcoe.

Since 1951, the LSRCA was organized and incorporated under the Conservation Authorities Act (1946). It has only one purpose and has been dedicated to conserving, restoring and managing the Lake Simcoe watershed. It's strict rules and regulations are continuously enforced including that even a boathouse can't be built on or in the lake; that structures must be at least 30m from the shoreline; and that the shoreline itself cannot be damaged or reconfigured. The Ontario government website about Environmental Assessments, it is written that “The environmental assessments process ensures that governments and public bodies consider potential environmental effects before an infrastructure project begins.”

Many submissions were received by the IAAC setting out numerous negative adverse impacts to be caused by building the Fixed Link. As you now know, the Proposed Fixed Link would start at Black River Road near Sutton Ontario, and in the designated Ontario Greenbelt an approximate 28-foot-wide raised road and would continue for approximately 800m toward the Lake Simcoe shoreline. Thousands of trees, bushes, flowers and other foliage will need to be cut down and destroyed. As well, many animals including deer, raccoons, rabbits, mongoose, ducks, geese, frogs, toads, snakes and other amphibian vertebrates inhabit the Greenbelt area, and the road is a danger to their lifestyle, safety, and habitat. Before entering the shoreline, the road turns into an over 30-foot-wide bridge built and raised above the shoreline and continuing into the lake for over 400 meters and which will rise to about 30 meters above the water. This bridge then meets the first causeway in the middle of the Lake to Georgina Island open area. Continuing to the Island, the causeway turns into another bridge and that bridge goes by the Sand Islands toward the Georgina Island shoreline and beyond is another causeway. Piles will need to be driven through the sandy bottom of the Lake and down to the bedrock and then an estimated 4.5 million cubic meters of fill will be dumped into the Lake, quite wider than the causeways and bridges to sustain these structures. During construction which may take years, the disturbance of the lakebed and then the construction of structures will create toxic water and noise level to kill off fish and any marine life in the area. As the water level between the Island and the mainland is about 7 feet, and the continuous movement of the fresh water from west to east, in summer, the exact area under the water level where the causeways and bridges will be built is covered with green plants and foliage. A perfect location for fish to spawn, minnows to grow, and other marine life to flourish. And they do. As well, this area is a landing location for thousands and thousands of birds to congregate, rest and eat. Geese, ducks and swans eat and swim at this location. There are also sightings of birds at risk. Of course, these structures will also cut off the view of the lake and the sunset for

many cottages and homes built by the Lake in addition to the noise and light pollution created.

The DPD, a 393-page document contains much detailed information about the Fixed Link. However, it's lacking in two most important aspects. Firstly, the IAAC Act is clear that an Alternative or Alternatives must be provided and the results of a consideration of such Alternative (s) are to be provided. The LSSRA submitted to the First Nations and the IAAC pictures, preliminary engineering drawings, and costs for a larger electric icebreaking ferry as an Alternative to the Fixed Link. The obvious Alternative of the electric icebreaking ferry is hardly mentioned in the DPD, but it is in a list in combination with another 9 Alternatives. (It's almost hidden.) The comment is then made that this list of Alternatives does not meet the requirements of the First Nations. This statement is not correct and the statement about the electric icebreaking ferry is also not correct. Most important is that an icebreaking ferry will operate 24 hours a day, seven days a week and 365 days a year no matter what the weather. It would provide year-round transport for residents, ambulances, emergency vehicles, construction equipment, regular cars and trucks as well as for passengers. A proper comparison with the proposed Fixed Link consisting of the roadway in the Greenbelt, and the causeways and bridges in Lake Simcoe would show the benefits of the icebreaking ferry and especially in all the aspects where the Fixed Link is weak. The existing ferry which was not built to be icebreaking, but has been in use throughout the winter for the last several winters. Ice in the channel between the mainland and the Island is never thick. The icebreaking ferry would cost a fraction of the cost of a Fixed Link. A comment about the lack of employees for the ferries is not consistent with people available at decent salaries. An Environmental Assessment should be required to properly compare the icebreaking ferry Alternative to the Fixed Link as required by the IAAC Act.

Further, an Environmental Assessment is required as Section 6 (3) of the IAAC Act which says, "The Government of Canada, the Minister, the Agency and federal authorities must, in the administration of this Act, exercise their powers in a manner that

(a) ensures that processes referred to in subsection (1) are fair, predictable and efficient; and

(b) adheres to the principles of scientific integrity, honesty, objectivity, thoroughness and accuracy.

And consider

(e) alternative means of carrying out the designated project that are technically and economically feasible, including using best available technologies, and the effects of those means;

(f) any alternatives to the designated project that are technically and economically feasible and are directly related to the designated project;

(h) the extent to which the designated project contributes to sustainability;

(i) the extent to which the effects of the designated project hinder or contribute to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change;

and (t) any other matter relevant to the impact assessment that the Agency requires to be taken into account.

Could it be clearer that the proposed Fixed Link requires a full Environmental assessment?

Regarding sustainability, the IAAC Act provides that "sustainability means the ability to protect the environment, contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations."

The project plans to connect an island bound First Nation, across and over a federally regulated navigable waterway, to private property owned by the First Nation within the municipality which is accessed by a municipal road, all in an area governed by multiple Ontario laws and regulations including the lakebed, with adjacent private properties in the Greenbelt.

We understand a vote was taken by the Chippewa First Nations requesting preference for the Fixed Link or a water-based solution. Appreciate that no information was provided about the Alternative of an electric icebreaker ferry to be built larger than the existing ferry and that will be available 24/7/365. Approximately 33% of First Nation resident voters did vote and 64% voted in favor of the Fixed Link. That would mean that approximately 45 voted in favor of a \$450 million Fixed Link.

We have respect for Indigenous Rights and self-determination for Georgina Island First Nations. The First Nations have every right to seek safe, reliable year-round access for its community. On the other hand, Lake Simcoe is in trouble. Scientific and policy work on phosphorous reduction, stormwater retrofits, habitat restoration and safe, clean water requires a serious long-term recovery plan. A healthy Lake Simcoe underpins the cultural, ecological wellbeing of everyone in the watershed including indigenous and non-indigenous communities. The Ontario government and the IAAC have a responsibility to engage in good faith with this infrastructure proposal and environmental and safety concerns. A **full Environmental Impact Assessment** undertaken by the federal and

provincial government, in collaboration with both the Chippewas of Georgina Island, the municipality and the Lake Simcoe Regional Conservation Authority is required.

In Conclusion, the recently signed “**Co-operation Agreement between Ontario and Canada on Environmental and Impact Assessment**” provides the duty and method for the IAAC to conduct a full Environmental Assessment jointly with Ontario. It’s timely for the IAAC and The Ministry of the Environment of Ontario to get together and announce the importance of this joint Environmental Assessment. We are hopeful for this announcement and so does the over 1000 members of our organization. Please protect Lake Simcoe.

Lake Simcoe South Shore Residents Association

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