

December 30, 2025

Ontario Ministry of the Environment, Conservation and Parks (MECP),

The Lake Simcoe South Shore Residents Association (LSSSRA) formal submission to the to Ontario Ministry of the Environment, Conservation and Parks to fulfill it's obligation to require a Full Environmental Assessment for the Georgina Island Fixed Link proposal to build a 2.6 km series of Bridges and Causeways in Lake Simcoe and an 800 m Roadway in the Greenbelt between Black River Road and to the shoreline.

We are writing to object to the decision in the Ontario Ministry of the Environment, Conservation and Parks (MECP) letter dated June 9, 2025 regarding the Georgina Island Fixed Link (GIFL), that the Ministry “will not be seeking designation of the project which would require it to proceed through the comprehensive environmental assessment process.”

Since that time, on December 11, 2025, the [“Co-operation Agreement between Ontario and Canada on Environmental and Impact Assessment”](#) was signed and on December 15, 2025, the [GIFL Detailed Project Description \(DPD\)](#) was filed with IAAC.

We urge the Ontario Minister and Staff to involve to the fullest extent the Ministries, departments, authorities, and staff at the various Ontario provincial government levels including the Lake Simcoe Regional Conservation Authority (LSRCA) to act upon their legal duty, to meet or exceed the Ontario legislation, regulations, policies, guidelines and standards.

We take exception and object to the Ministry's June 2025 decision NOT to require a full Environmental Assessment for the 2.6 km Fixed Link between Georgina Island and the mainland. The [Lake Simcoe Regional Conservation Authority](#) (“LSRCA”), the [Lake Simcoe Shore Residence Association](#) (“LSSSRA”), the [Rescue Lake Simcoe](#) Association, and [GIFN band members](#) and many others made Submissions on the significant impacts to be caused in Lake Simcoe during construction and with the intrusion of this Fixed Link proposal, the largest intrusion structure ever to be proposed for Lake Simcoe. This project with its 4.5 million cubic meters of fill, steel piers and concrete, would be dumped into a highly environmentally sensitive area of Lake Simcoe and will pose a significant risk to the health of Lake Simcoe.

Bridge-causeway-road impacts to **sedimentation, erosion, source water, ice, shallow water habitats, flooding and wave up-rush, and construction methodology** have not been adequately addressed in the engineering studies provided by the proponent. The DPD documents provides lists including endangered creatures but provides no damage control

or mitigation by only saying, “to be determined during the detailed production phase.” In other words, in the future.

We urge the MECP to call upon its expertise and the LSRCA watershed expertise, so that proper environmental studies and the ecological function of Lake Simcoe and surrounding areas are studied for Ontario to meet its legal obligations. The Baird study to update the 1981 Shoreline Flood Elevation Study, was knowingly and deliberately NOT referenced in the DPD, despite its reference in the May 29, 2022, LSRCA submission to IAAC. The LSRCA scientists and Board of Directors have a duty to follow up on the 36 points raised in the LSRCA Staff Report submitted to the IAAC on February 23, 2024. 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.

Additionally, **the Ferry Alternative Report was withheld and not included in the DPD or even shared with the Georgina Island First Nation band members before their vote to proceed.**

Ontario must not be negligent now that the DPD has been filed and the Canada Ontario Cooperation Agreement was enacted in December 2025. We disagree with a number of the representations in the DPD. We disagree that the process has been “**transparent**” nor does it “**foster mutual respect and trust.**” For example, the 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. Of The 209 First Nation residents that live on the Island, in October a vote was held where one-third voted, with 64 per cent voting in support of continuing detailed planning and design for a Fixed Link connection. That’s about 44 First Nations voting for a \$450 million project. How the GIFN vote was conducted with so few band members voting for the Fixed Link should be concerning, when the magnitude of this project is so significant to all Ontarians.

Ontario has a fiduciary duty and duty of care for the health of Lake Simcoe and the Greenbelt to conduct a joint Environmental Assessment with the IAAC.

Lake Simcoe is the fourth largest lake in the province of Ontario and subject to many Acts of the Ontario legislature including the [Lake Simcoe Protection Act](#) (19(3)) which Act says specifically that it is “ **to protect and restore the ecological health of Lake Simcoe**”. Monitoring of Lake Simcoe and its watershed is a continuous and collaborative effort to achieve the goals of the Lake Simcoe Protection Act. This involves collaboration between the Ministry of the Environment, Conservation and Parks (MECP), the Ministry of Natural

Resources (MNR) and Lake Simcoe Region Conservation Authority (LSRCA), along with research and monitoring studies performed with academics.

Many other Ontario Acts legislate matters involving Lake Simcoe including:

- (a) the Aggregate Resources Act,
- (b) the Clean Water Act, 2006,
- (c) the Conservation Authorities Act,
- (d) the Crown Forest Sustainability Act, 1994,
- (e) the Endangered Species Act, 2007,
- (f) the Environmental Assessment Act,
- (g) the Environmental Protection Act,
- (h) the Fish and Wildlife Conservation Act, 1997,
- (i) the Lakes and Rivers Improvement Act,
- (j) the Nutrient Management Act, 2002,
- (k) the Ontario Water Resources Act,
- (l) the Pesticides Act,
- (m) the Public Lands Act

Since 1951, the LSRCA, which was organized and incorporated under the Conservation Authorities Act (1946) 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 30 m from the shoreline; and that the shoreline itself cannot be damaged or reconfigured.

We learned in December 2025 that the new proposed Georgina Island Fixed Link design has now changed to a 110m causeway, 731m bridge, plus 494m causeway and a 1250m high-level bridge. It would start at Black River Road in the designated Ontario Greenbelt with impacts to woodlands, watercourses and wildlife. Habitat and Species at Risk will be permanently destroyed as they build a 800 m road. GIFL will irreversibly impact Lake Simcoe migratory birds and fish spawning. Whitefish populations are under threat and are actively being studied by the Department of Fisheries in Lake Simcoe. We again highlight our concerns on fish (e.g. Lake Sturgeon, Whitefish) and fish habitat, cumulative effects, navigation, migratory birds, species-at-risk (blanding turtles, least bittern, eastern whip-poor-will, bumblebees...), increased invasive species. The structures will cut off the views of the lake and sunset from nearby houses and cottages and introduce noise and light pollution. Boat and car safety is of great concern, particularly in extreme weather conditions.

After seeking legal counsel, it is our position that the GIFL and all its structures are covered within the purpose of the Environmental Protection Act, the Lake Simcoe Protection Act, and the Lake Simcoe Conservation Authority. On 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” The adverse effects and impacts are the exact subject matter all of which will take place in Ontario and require an Ontario Environmental Assessment.

We also believe another important reason for an Environmental Assessment requirement is in order to compare the benefits of utilizing an electric icebreaking ferry as an alternative to building the Fixed Link. A new ferry built to the First Nations specification could be larger than the existing ferry to transport more cars and passengers on each trip. In support of a fair and reasonable solution, the LSSSRA submitted to the First Nations and the IAAC pictures, preliminary engineering drawings, and costs for a larger than the existing electric icebreaking ferry as an alternative to the Fixed Link. This new ferry meets all stated requirements of the First Nations, and in particular satisfies the band members who do not want the legacy of the permanent negative environmental impacts to Lake Simcoe. Such a ferry would safely and comfortably transport people and vehicles 24/ 7/365 in every weather condition and in an environmentally friendly manner. There would be no need for an Environmental Assessment as a ferry system is carrying on with the existing system not causing any environmental damage or impacts. The cost would be less than 1/20 that of the Fixed Link and less operating cost each year. Purposely the Alternative of an ice breaking ferry was not properly presented in the DPD and was mentioned with another 9 alternatives as “not satisfying the First Nations requirements”. The alternative of an ice breaking electric ferry is a “smart” solution and should be a part of an Environmental Assessment.

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 has 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

Ontario to conduct a full Environmental Assessment jointly with the IAAC. With the December filing of the DPD, it's timely for The Ministry of the Environment of Ontario and the IAAC to get together and request this joint Environmental Assessment for GIFL. We are hopeful for this announcement and so does our over 1000 members of our Lake Simcoe organization. We are willing to discuss this with you at any time and look forward to your response. Please protect Lake Simcoe.

Lake Simcoe South Shore Residents Association

Lee Simpson

References:

1. [Lake Simcoe Protection Act, 2008, S.O. 2008, c. 23](#)
2. LSRCA IAAC [Enclosure 1 - Advice Record - Georgina Island Fixed Link Project LSRCA May 27 2022.pdf](#)
3. [Lake Simcoe Region Conservation Staff Report on Georgina Island Fixed Link Redacted.pdf](#) February 23, 2024
4. [Lake Simcoe South Shore Residents Association Section 16 request to IAAC April 2024.pdf](#)
5. GIFN [Letter to IAAC February 2024.pdf](#)
6. MECP IAAC submission: [MECP Comments - Comment Table for Georgina Island Fixed Link Project Draft Initial Project Description.pdf](#)
7. [MECP Comments - Enclosure 1 - Provincial Advice Record - Georgina Island Fixed Link Project.pdf](#)
8. Georgina Island Fixed Link – Detailed Project Description of a Designated Project [164166E.pdf](#) December 2025
9. [Feds' decision on Georgina Island Fixed Link expected in the new year » Georgina Post](#) December 2025
10. [Co-operation Agreement between Ontario and Canada on Environmental and Impact Assessment](#), December 2025

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