

## Enclosure: Provincial Advice Record

### Response due by June 14, 2023

Marmora Clean Energy Hub Project

Agency File: 84597

All comments should be submitted via the **Submit a Comment** feature available on the Project's Canadian Impact Assessment Registry page<sup>1</sup>. Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at [Marmora@iaac-aeic.gc.ca](mailto:Marmora@iaac-aeic.gc.ca).

<b>Ministry/Agency</b>	Ministry of Tourism, Culture and Sport, Tourism Policy and Research Branch – Tourism Policy Unit
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### 1. Expertise

Identify and describe the area of expertise within your ministry that is relevant to an assessment of the Project.

Knowledge of the interests of the tourism sector, especially resource-based tourism.

<sup>1</sup> Reference #84597 at <http://iaac-aeic.gc.ca/050/evaluations/document/147660?culture=en-CA>

## 2. Key issues and solutions

Respond to the following **Table 1: Key Issues to inform decision-making** on the last page.

What are the key issues likely to be relevant to the public interest decision, based on the mandate and area(s) of expertise of your ministry or agency, and which should be addressed in an impact assessment of the Project, should the Agency determine that one is required?

For each key issue:

- Describe the effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Identify any clarifications or commitments the Proponent could make in its Detailed Project Description and Response to the Summary of Issues that would build confidence that issues can be addressed and managed without further impact assessment;
- Identify briefly solutions to the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be used by the Agency to determine if and an impact assessment is required and where appropriate to develop project-specific draft Tailored Impact Statement Guidelines that focus on the key issues likely to be relevant to the public interest decision.

## 3. Provincial policies, operational guidance, and permits and approvals

Within the mandate and area(s) of expertise of your ministry, list, along with a brief description, specific operational policies or guidance documents that could help address issues and manage effects relevant to the project context.

We do not have relevant tourism legislation, regulations, operational policies, guidance documents or permits/approvals that are relevant to the project.

4. The Agency understands that in accordance with the *Electricity Projects Regulation* (O. Reg. 116/01) of Ontario's *Environmental Assessment Act*, new waterpower projects greater than 200 MW in capacity must undergo an Individual Environmental Assessment (EA). Therefore, based on the Initial Project Description, this project would be subject to an Individual Provincial EA.

When your ministry or agency undertakes the technical analysis (e.g. potential environmental effects) related to this Project, would you be willing to cooperate with the Agency on this analysis?

Yes, but only from the perspective of how the project may impact tourism interests within the project area.

5. (a) List and provide a short description of provincial permits or regulatory approvals that might be applicable to the Project.

(b) For each provincial permit or regulatory approval that would be required for the Project, please provide the following information:

- i. Explain any associated framework to address effects on valued components within your mandate.
- ii. Describe any Indigenous consultation activities that would occur, potential timelines for Indigenous participation, and how potential impacts to Indigenous communities are addressed by your ministry.
- iii. Describe any public participation opportunities that would occur, and potential timelines for public participation.

N/A from a tourism perspective.
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*Add rows as needed*

6. Is there any additional information related to the geographic context of the Project (e.g. potential effects to natural heritage features, Indigenous protected and conserved areas, provincial species at risk, provincial policy statements on planning or zoning in the area) for which your ministry has information or authority?

Not from a tourism perspective.
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Jim Antler  
**Name of Departmental / Agency Responder**

Policy Advisor  
**Title of Responder**

June 14, 2023  
**Date**

**Table 1: Key Issues to inform decision-making**

The Agency asks that provincial ministries or agencies align expert advice with the Agency’s approach to tailoring, which focuses on key issues or effects that are likely to be relevant to the public interest decision. In identifying key issues, provincial authorities should be mindful of the Project’s context (size, scope, location), Indigenous knowledge and perspectives, and public concerns. Key issues that may be relevant to the public interest decision include:

- effects that may be significant, based on provincial experts’ knowledge and experience with past projects;
- effects that may impact Indigenous peoples and their rights, based on Indigenous knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- transboundary effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous peoples; and
- key concerns raised by Indigenous or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation measures, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from provincial authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable the Agency to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Solutions	Plain language summary for inclusion in Summary of Issues
<i>Please identify comments by organization and comment number.</i>  <i>e.g.: IAAC-01</i>	<i>Identify valued component(s) or factor to consider—within the mandate of your ministry or agency—to which the effect or issue applies.</i>	<i>Provide a brief description of the issue and rationale for being a key issue.</i>  <i>Include, where relevant:</i> <ul style="list-style-type: none"> <li>• the pathway of effects;</li> <li>• social, economic or environmental context which are relevant to it being a key issue;</li> <li>• key uncertainties that should be addressed in the impact assessment;</li> <li>• Indigenous or public concerns or perspective;</li> <li>• potential for differential effects among diverse subgroups;</li> <li>• scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</li> </ul>	<i>Where applicable, briefly identify solutions to address the potential issue or effects including</i> <ul style="list-style-type: none"> <li>• Information or studies required to describe and characterize the effect, should an impact assessment be required; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</li> <li>• Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</li> <li>• Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</li> <li>• Commitments the proponent could make to respond to the issue.</li> </ul>	<i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</i>
MTCS-01	Potential impact of the project on tourism interests in the area	The IPD provides little insight on tourism businesses/activities in the project area, or what impacts the project could have on them. The IPD list of stakeholders identified by the Proponent did not address all tourism stakeholders located within the project area.	Provide greater insight in the Detailed Project Description (DPD) on other economic interests, including tourism, in Section 3.9 and/or commit to gathering additional information for use in assessing potential impacts. Options could include an inventory, map or other format.	Include a commitment in the DPD to compile an inventory of tourism business interests in proximity to the project to be used in assessing any project-related impacts.
MTCS-02	Potential tourism development opportunities related to the project	The IPD highlights potential tourism development opportunities associated with the project in: <ul style="list-style-type: none"> <li>- Section 2.2 (Potential Economic Benefits) - opportunity for economic development in the form of job creation, tourism and education</li> <li>- Table 2-8: Preliminary Alternative Methods Criteria - ground mount solar providing future recreational and green tourism opportunities</li> </ul>	Provide more detail relating to the type of tourism economic development expected, or what additional work may need to be done to determine the feasibility of development, including who could be the proponent(s) and related responsibilities.	Provide more detail on what work may need to be done to determine feasibility of project-related tourism development opportunities and provide an overview of any discussions to date with potential partners on such development.
MTCS-03	Sensitive receptors for air quality, noise and vibration	Section 3.8.1 (Climate, Air Quality, Noise and Light) notes that in accordance with the Tailored Impact Statement Guidelines (TISG) Template for Designated Projects Subject, the list of sensitive	In developing the eventual list of sensitive receptors, consideration should be given to including tourism receptors. In looking at a map of the Marmora area there are several tourism-related businesses in the community including campgrounds/resort east and west of the site.	Include tourism businesses as potential sensitive receptor locations for air quality, noise and vibration based on proximity to project and other relevant factors.

		receptors associated with both the construction and operation of the Project will be compiled.		
MTCS-04	Socioeconomic Environment	Section 5.6 - Table 5-2: Preliminary Summary of Potential Environmental Effects (page 111) identifies potential positive socioeconomic benefits from the project (i.e. employment, procurement, tourism and recreation)	Table 5-2 does not reference any potential negative socioeconomic effects from the project that could disturb other economic uses such as tourism. For example, whether noise, vibration or other factors could degrade the visitor experience at tourism businesses.	Provide additional insight in the DPD on how potential socio-economic effects on other economic sectors, such as tourism, will be assessed should an impact assessment be required.

*Please insert additional rows as necessary.*