Georgian Bay Forever
P.O. Box 75347
Leslie Street
Toronto, ON M4M 1B3
www.gbf.org

April 5, 2026

Impact Assessment Agency of Canada
Ontario Region Office
1600–55 York Street
Toronto, ON M5J 1R7

Re: Comments on the Project Description for the Ontario Pumped Storage Project (TC Energy) – IAAC Registry #89803

Executive Summary

Georgian Bay Forever (GBF) is a registered Canadian charity whose mission is "to protect and enhance Georgian Bay through science, research, education and action." GBF conducts advanced scientific monitoring using autonomous underwater vehicles, remotely operated underwater vehicles, multispectral drone systems, and has already completed preliminary aquatic assessments in the area adjacent to the proposed Ontario Pumped Storage Project. GBF is therefore, by its mission a directly affected party whose scientific work, charitable mission, and long-term stewardship responsibilities stand to be materially impacted by the project. Moreover, our scientific environmental monitoring of Georgian Bay has given us a good understanding of the potential risks to Georgian Bay and surrounding area associated with this project.

The southern coast of Georgian Bay, including the Blue Mountains' (Craigleith community) corridor, is one of the fastest-growing regions in Canada, with substantial residential, tourism, and commercial development underway. This growth depends on the long-term reliability of Georgian Bay as a drinking-water source and as the ecological foundation of the region's economy. Large-scale withdrawals and discharges associated with the proposed project would add significant new stress to a waterbody already facing cumulative pressures from rapid population growth, shoreline intensification, climate-driven thermal changes, and declining cold-water refugia. Without a rigorous cumulative effects assessment, the project risks undermining provincial and municipal growth plans that require sustained health and stability of southern Georgian Bay's water resources.

After reviewing the Initial Project Description for the Ontario Pumped Storage Project, GBF concludes that the document significantly understates the scale, permanence, and ecological risks associated with both construction and operation. The Project Description does not provide the level of detail, transparency, or scientific rigour required for a robust federal impact assessment under the Impact Assessment Act.

Summary and Requested Actions

GBF respectfully submits that the Project Description, as written, does not provide a sufficiently accurate or transparent basis for federal impact assessment. GBF also notes that the "Initial Project Description – Plain Language Summary" and the "Initial Project Description" documents present materially different accounts of the project's scale, infrastructure, environmental interactions, and alternatives. Several key project elements — including the marine port facility, underground powerhouse cavern, lakebed tunneling, open-loop water withdrawals from Georgian Bay, and the identification and evaluation of reasonable alternatives — are minimized or omitted in the Plain Language Summary. These inconsistencies impede meaningful public participation and fall short of the transparency and alternatives-analysis requirements of the Impact Assessment Act.

GBF respectfully requests that the Impact Assessment Agency require TC Energy to:

1. Correctly characterize the marine facility as a port and assess full shoreline impacts.
2. Provide detailed engineering and environmental analysis of the underground powerhouse cavern.
3. Fully assess lakebed tunneling and intake/outlet impacts.

3A. Require baseline studies including:

- hydrodynamic modelling
- sediment transport modelling
- benthic habitat surveys
- entrainment and impingement baseline
- quagga mussel colonization baseline
- nutrient cycling baseline
- groundwater flow and fracture mapping
- drinking water intake mapping
- UXO contamination baseline

4. Explicitly acknowledge that the project is an open-loop system and require a full alternatives assessment, including alternatives that avoid or reduce the use of Georgian Bay as the lower reservoir.
5. Require a comprehensive assessment of quagga mussel fouling and antifouling measures across all wetted project components.
6. Provide decommissioning plans for the preferred option and all alternatives (lifecycle comparison requirement)

6A. Provide credible decommissioning plans for all surface and underground structures (infrastructure end-of-life requirement).

7. Require a full geotechnical and hydrogeological assessment of karst conditions and prohibit the use of non-committal mitigation language ("where feasible").
8. Require a complete drinking-water effects assessment, including hydrodynamic and thermal modelling, entrainment analysis, antifouling chemical fate and transport, and cumulative-effects evaluation for all municipal and private intakes.
9. Require a comprehensive cumulative-effects assessment addressing the interaction of environmental, hydrological, geotechnical, cultural, and socio-economic impacts, including interactions among hydrodynamic alteration, karst conditions, tunneling, thermal discharge, quagga mussel colonization, UXO disturbance, and risks to municipal and private drinking-water intakes.
10. Require integration of the DND Relocated Infrastructure Project at 4 CDTC into this Project Description and effects assessment and expand assessment of UXO and DND land

disturbance impacts.

11. Submit a substantially revised Table 11-1.

11A. Require assessment of vibration and acoustic impacts across underwater, atmospheric, and ground-borne pathways, including effects on aquatic species, shoreline communities, and DND infrastructure.

12. Submit a revised Waste and Emissions inventory (Table 12-1).

Detailed Analysis

1. Mischaracterization of Marine Access as a Minor Activity

The Project Description refers to "potential Marine Access," but the described function is the construction of a port facility on the Georgian Bay shoreline to move heavy equipment and bulk materials. This is a major industrial shoreline transformation, not a temporary access point.

The description fails to assess:

- nearshore habitat loss
- sediment disturbance and turbidity
- vessel traffic, noise, and lighting
- shoreline stability and erosion
- cumulative industrialization of a currently non-port area

The Project Description must explicitly characterize this as a marine terminal and assess it accordingly.

2. Excavation of a Massive Underground Powerhouse in the Niagara Escarpment

The Project Description states that the facility will require "excavation of vertical shafts, drilling, blasting, and/or tunneling," but this phrasing obscures the true scale of the undertaking. The proposed powerhouse is a 1,000-MW underground multi-turbine cavern mined directly into the Niagara Escarpment, a UNESCO-recognized geological formation. This represents a permanent geological alteration with implications for groundwater flow, fracture propagation, long-term cavern stability, and irreversible loss of natural limestone formations.

A complete alternatives analysis is required under the Impact Assessment Act, yet the Project Description does not evaluate surface-based or reduced-excavation configurations that would avoid deep subsurface excavation into the Escarpment. Comparable pumped-storage facilities demonstrate that such alternatives are technically viable. For example, the Ludington Pumped Storage Plant (Michigan) — one of the largest pumped-storage facilities in North America — is entirely surface-based, with no deep underground powerhouse cavern. Its design illustrates that large-scale pumped-storage systems can be constructed without extensive tunneling or excavation into sensitive geological formations.

Similarly, Ontario already hosts deep-mine pumped-storage facilities that operate within existing mine voids rather than newly excavated caverns. These facilities demonstrate that underground pumped storage can be achieved using pre-existing excavations, significantly reducing geomechanical disturbance, groundwater disruption, and long-term stability risks. The existence of these Ontario precedents underscores that TC Energy's proposed approach is not the only technically feasible option and that alternatives with substantially lower geological impact are available.

Taken together, these examples reinforce the need for a full alternatives assessment that includes:

- surface-based powerhouse configurations
- use of existing excavations or disturbed sites

- reduced-excavation or hybrid designs
- avoidance of new deep-cavern mining in the Niagara Escarpment

Without this analysis, IAAC cannot determine whether the proposed underground cavern is environmentally justified or simply the proponent's preferred engineering approach.

3. Tunneling into Georgian Bay for Intake/Outlet Structures

Construction of the Lower Inlet/Outlet Structure through tunneling, drilling, or in-water construction represents a major disturbance to the lakebed.

Risks include:

- destruction of benthic habitat
- sediment plumes affecting fish and spawning areas
- blasting impacts on aquatic life
- long-term changes to local currents and temperature regimes
- entrainment and impingement of fish and invertebrates

The Project Description must provide:

- precise intake/outlet locations and depths
- sediment plume modelling
- entrainment/impingement risk analysis
- mitigation measures for blasting and drilling
- a full alternatives analysis comparing tunneling to surface-based or near-shore intake designs, including their relative environmental, hydrological, and socio-economic impacts

Without this analysis, IAAC cannot determine whether tunneling into Georgian Bay is the least impact option or simply the proponent's preferred engineering approach to address public concerns regarding visual impacts.

4. Misleading Implication of a Closed-Loop System

The operations description suggests water is cycled "within the Reservoir." This is inaccurate. Georgian Bay is the lower reservoir in an open-loop system. Georgian Bay is a freshwater ecosystem supporting:

- sensitive aquatic ecosystems that importantly affect dependent fish

Large-scale withdrawals and discharges will impact:

- water quality
- temperature – cold water refugia
- suspended solids
- aquatic life

The Project Description must clearly state that this is not a closed-loop system and assess both the implications and the alternatives. Under the Impact Assessment Act and the Information and Management of Time Limits Regulation, the Initial Project Description must clearly describe:

- the nature of the project, including whether it is open-loop or closed-loop
- the interactions between project components and the receiving environment
- the alternative means of carrying out the project and the environmental effects of those alternatives

The current description does not meet these requirements. These omissions prevent the Project Description from meeting the requirements of s. 10(1)(e) of the Information and Management of Time Limits Regulation, which obligates proponents to describe the alternative means of carrying

out the project and the environmental effects of those alternatives.

5. Omission of Quagga Mussel Fouling and Antifouling Chemicals

GBF has repeatedly raised concerns since 2021 regarding quagga mussel fouling of intake structures. The Project Description:

- does not acknowledge quagga mussels
- does not identify antifouling strategies
- does not assess chemical or mechanical cleaning impacts
- omits this issue from the "concerns raised to date" section

In Georgian Bay, quagga mussel colonization of large-diameter intakes is a certainty, not a possibility. Power plants in the Great Lakes region, including those in Ontario, typically use techniques like chlorination to prevent mussels from settling inside the intake tunnels.
The Project Description must therefore identify:

- expected fouling rates
- proposed antifouling chemicals or systems
- environmental fate and effects of any biocides
- implications for water quality and aquatic life

5A. System-Wide Quagga Mussel Impacts

Quagga mussels will colonize all wetted components of the Ontario Pumped Storage Project, including:

- the uphill surface reservoir
- turbine passages and draft tubes
- raceways and penstocks
- intake and outflow piping
- header structures and towers

This omission has profound implications for hydraulic performance, entrainment, water quality, structural integrity, and compliance with the Fisheries Act.

Hydraulic and Entrainment Implications

As mussels accumulate, they reduce the effective open area of pipes and headers, forcing the system to operate at higher velocities against more turbulence to achieve the same volume throughput. These changes have the following effects:

- increase entrainment and impingement
- invalidate "clean system" hydraulic modelling
- render intake-velocity mitigation measures ineffective
- accelerate further mussel colonization

The Project Description does not model:

- reduced intake area
- increased velocities
- turbulence effects
- entrainment under fouled conditions
- cleaning frequency or waste streams
- antifouling chemical use

Structural Risks

Quagga mussels add substantial dead load to submerged structures, increasing bending moments, fatigue, and dynamic loading during storm events. This may compromise structural integrity and increase the risk of:

- partial structural failure
- uncontrolled release of mussel biomass
- emergency shutdowns
- unplanned discharges into Georgian Bay

Fisheries Act Implications

The omission prevents the proponent from demonstrating compliance with:

- Section 34.4(1) – harmful alteration, disruption, or destruction of fish habitat
- Section 35(1) – death of fish by means other than fishing
- Section 36(3) – deposit of deleterious substances

Given the certainty of quagga colonization, the absence of system-wide fouling analysis is a fundamental flaw.

6. Absence of a Credible Decommissioning Plan

The Project Description does not provide a credible or technically grounded decommissioning plan for the underground powerhouse cavern, lakebed tunnels, intake/outlet structures, or any of the alternatives referenced in the document. This omission prevents IAAC from evaluating the full lifecycle environmental, hydrological, geotechnical, and socio-economic impacts of the project, as required under the Impact Assessment Act.

The proposed 1,000-MW underground powerhouse cavern — mined into the Niagara Escarpment — represents a permanent geological alteration. The Project Description does not identify:

- long-term stability risks mitigation
- groundwater migration pathways
- fracture propagation mitigation
- potential for subsidence or collapse mitigation
- long-term contamination of pathways mitigation
- end-of-life structural treatment (backfilling, sealing, or abandonment) strategies

Similarly, the lakebed tunnels and intake/outlet structures lack any decommissioning analysis. These structures will remain permanently embedded in Georgian Bay sediments and bedrock unless removed or remediated. The Project Description does not assess:

- long-term deterioration of submerged concrete and steel
- risks of collapse or sediment infill
- implications for benthic habitat and hydrodynamics
- residual entrainment hazards
- contamination from abandoned infrastructure

The absence of decommissioning plans extends to all alternatives. The Project Description references alternative intake configurations, alternative reservoir designs, and alternative construction methods but does not provide decommissioning scenarios for any of them. Without this information, IAAC cannot compare alternatives on a full lifecycle basis.

A complete decommissioning plan must include:

- engineering assumptions for cavern closure
- long-term groundwater and geomechanical modelling
- removal or stabilization of lakebed tunnels
- treatment of contaminated sediments and fouling biomass

- end-of-life management of antifouling chemicals
- restoration of shoreline and terrestrial areas
- costed scenarios for each alternative

Until these plans are provided, the Project Description does not meet the requirements for a robust federal impact assessment.

The lack of decommissioning scenarios for the preferred option and all alternatives prevents the Project Description from meeting the requirements of s. 10(1)(e) and s. 10(1)(f) of the Information and Management of Time Limits Regulation, which require lifecycle-appropriate descriptions of alternative means and their environmental effects.

7. Geotechnical Risk and Karst Mitigation – Use of Non-Committal Language ("Where Feasible")

The IPD acknowledges the presence of karst conditions in the area of the proposed reservoir but repeatedly states that mitigation measures will be implemented only "where feasible."

This phrasing is incompatible with IAAC expectations for enforceable, verifiable mitigation and does not meet international dam-safety standards for reservoirs constructed on karst terrain.

Karst-related risks – including uncontrolled leakage, hydraulic connection to Georgian Bay, sinkhole formation, and structural instability of the ring dam – require committed, engineered, and guaranteed mitigation, not discretionary or conditional measures.

The current wording prevents IAAC from evaluating the project's geotechnical viability, long-term safety, and groundwater/surface-water interactions.

8. Risks to Municipal and Private Drinking Water Intakes

The Project Description does not adequately assess risks to municipal and private drinking water systems located along the southern Georgian Bay shoreline. These systems rely on stable water quality, predictable temperature regimes, and low suspended-solids loading. These are conditions that may be significantly altered by the proposed project.

Large-scale withdrawals and discharges will affect:

- turbidity and suspended solids
- thermal structure, including loss of cold-water refugia
- entrainment of planktonic organisms
- pressure and shear forces
- chemical composition due to antifouling systems
- sediment resuspension during tunneling and blasting

Municipal systems in the region are already operating under increasing pressure due to rapid population growth. Any degradation in source-water quality may require costly treatment upgrades, operational changes, or intake relocation.

Private shoreline intakes in the Meaford area are even more vulnerable. These systems lack the treatment capacity to manage increased turbidity, thermal shifts, or chemical contamination.

The Project Description must include:

- mapping of all municipal and private intakes
- hydrodynamic modelling of plume dispersion
- thermal modelling of discharge effects
- entrainment/impingement risk analysis
- assessment of antifouling chemical fate and transport
- cumulative-effects analysis incorporating regional growth projections

Without this analysis, IAAC cannot determine whether the project poses unacceptable risks to drinking water systems.

9. Absence of a Cumulative-Effects Assessment

The Project Description does not include a cumulative-effects assessment, despite the number, magnitude, and interaction of the project's environmental, hydrological, geotechnical, cultural, and socio-economic effects. This omission is a fundamental deficiency under the Impact Assessment Act, which requires proponents to assess cumulative effects arising from the project in combination with other past, present, and reasonably foreseeable activities.

The IPD fragments effects across project components and tables, preventing IAAC from understanding these effects cumulatively interact. The project is not a single activity; it is a combination of high-impact undertakings — lakebed tunneling, port construction, reservoir development on karst terrain, deep underground excavation, thermal discharge, hydrodynamic alteration, UXO disturbance, quagga mussel colonization risk, and proximity to municipal and private drinking-water intakes. Each of these has independent effects, but their interactions are where the most significant risks arise.

Examples of unassessed cumulative interactions include:

- hydrodynamic alteration combined with quagga mussel colonization, affecting nutrient cycling and water quality
- tunneling and blasting combined with karst conditions, creating unpredictable groundwater pathways
- thermal discharge combined with stratification, increasing cyanobacterial bloom risk
- port operations combined with UXO disturbance, resuspending contaminated sediments
- intake/outlet flows combined with municipal intakes, increasing cumulative entrainment and water-quality degradation

These are not additive effects; they are multiplicative. Without a cumulative-effects assessment, IAAC cannot evaluate whether the project's impacts are mitigable or even whether this project is compatible with the receiving environment. Based on the impacts already identified — many raised through community engagement — it is plausible that several effects cannot be mitigated to acceptable levels without a comprehensive cumulative-effects analysis.

This deficiency is distinct from the omission of the DND Relocated Infrastructure Project (Item 10), which concerns the exclusion of a major interdependent undertaking from the effects assessment.

The absence of a cumulative-effects assessment is inconsistent with the requirements of s. 10(1)(f) of the Information and Management of Time Limits Regulation, which requires proponents to identify and describe the effects of the project in combination with other past, present, and reasonably foreseeable activities.

10. Lack of a coherent, integrated analysis of environmental effects across project components

Omission of the DND Relocated Infrastructure Project at 4 CDTC from the Effects Assessment

The Project Description omits the DND Relocated Infrastructure Project at 4th Canadian Division Training Centre (4 CDTC), despite the fact that this relocation exists solely because of the pumped storage proposal. The two undertakings are not independent. The pumped storage facility requires the displacement of existing DND operations, and the resulting relocation project involves land clearing, blasting, grading, road construction, and long-term operational changes that directly overlap with — and are physically inseparable from — the pumped storage project footprint.

These landscape alterations will occur once, yet by assigning them to the DND project rather than the pumped storage project, the proponent removes major surface-disturbance effects from the pumped storage assessment. This structural division obscures the true extent of environmental change, including cumulative hydrological and geomorphological alterations, habitat loss, species-at-risk impacts, and cultural landscape disturbance. It also artificially reduces the apparent footprint, cumulative effects, and environmental responsibilities associated with the pumped storage project.

Treating these interdependent activities as separate undertakings prevents IAAC from evaluating the full environmental, socio-economic, and cultural implications of the pumped storage project, contrary to the requirements of the Impact Assessment Act. The omission of the DND Relocated Infrastructure Project therefore represents a material deficiency in the Project Description and undermines the integrity of the effects assessment.

This omission must be corrected before any table-based effects assessment (including Tables 11-1 and 12-1) can be considered complete or reliable.

This omission is separate from the broader absence of a cumulative-effects assessment (Item 9), which prevents IAAC from understanding how these interdependent effects interact.

Under the Act, interdependent activities that enable the designated project must be included in the effects assessment, regardless of proponent identity.

11. Comprehensive GBF Critique of Table 11-1: Potential Effects of the Project

With the project scope improperly defined and major lifecycle components omitted, the deficiencies in Table 11-1 become even more consequential. GBF finds that Table 11-1 systematically understates, omits, or misclassifies the most consequential environmental, socio-economic, cultural, and Indigenous impacts of the project.

The table frames effects as routine, temporary construction disturbances, when in fact the project involves:

- permanent shoreline industrialization
- excavation of a massive underground cavern
- tunneling into Georgian Bay
- long-term hydrological and ecological alteration
- significant impacts on Indigenous rights and cultural landscapes

Air Quality, Noise, Visual Setting, Terrain, Groundwater, Surface Water

The table omits or minimizes:

- underwater noise
- permanent visual impacts
- geological risks
- groundwater alteration
- entrainment/impingement (not reflected in Table 11-1 despite being addressed elsewhere in the Project Description)
- thermal changes
- antifouling chemicals
- drinking water risks (omitted from Table 11-1 despite their significance)

Fish and Fish Habitat

Permanent habitat loss, spawning disruption, and entrainment/impingement are treated as "potential" rather than reasonably expected based on comparable facilities and known system behaviour unless demonstrated otherwise through modelling. The Project Description also fails to acknowledge the environmental history of comparable facilities such as the Ludington Pumped

Storage Plant, which experienced documented severe entrainment impacts documented and a recent Bruce Power water intake incident. IAAC assessment must refer to federal Fisheries Act legislation within its assessment.

Vegetation, Wetlands, Wildlife

Permanent shoreline alteration, habitat fragmentation, underwater noise, and impacts on migratory species are understated.

Socio-Economic Conditions

Impacts on fishing, tourism, boating, property values, and drinking water systems are omitted.

Archaeology, Cultural Heritage, Indigenous Interests

Underwater cultural resources, Escarpment cultural significance, harvesting impacts, navigation, and cumulative effects on rights and livelihoods are minimized.

Transmission Cable Impacts (HVAC vs HVDC)

The table excludes assessment of:

- EMF differences
- thermal impacts
- trenching and cooling requirements
- benthic disturbance
- sediment resuspension

Surface Site Impacts on the DND Tank Range

The table fails to assess:

- safety risks
- operational constraints
- contamination pathways
- disturbance of legacy munitions

Omission of Primary Electricity Losses and Make-Up Energy Requirements

The table does not address the substantial upstream environmental impacts associated with round-trip inefficiency. Make-up energy requirements are equivalent to the output of one Darlington SMR. GBF recommends that IAAC require TC Energy to submit a substantially revised Table 11-1.

12. Waste and Emissions (Table 12-1) – Major Omissions and Mischaracterizations

Table 12-1 significantly understates the project's waste streams and discharges.

Air Emissions

Omitted:

- blasting emissions
- diesel particulate matter
- marine vessel emissions
- multi-year tunneling emissions
- PM2.5 is a CAAQS-regulated pollutant requiring explicit quantification, dispersion assessment, and comparison to federal standards
- other criteria air contaminants (NO_x, SO_2, CO, VOCs, PM_{10}) required under CAAQS and federal air-quality reporting expectations

These omissions prevent IAAC from evaluating compliance with the CAAQS and from understanding the project's full construction-phase and operational air-quality impacts on nearby residences, the 4 CDTC Garrison, and sensitive receptors such as the on-site daycare.

Noise Emissions

Omitted:

- underwater hydrodynamic noise
- low-frequency turbine noise
- vibration transmission through bedrock

The Project Description omits assessment of vibration and acoustic impacts across all media — underwater sound, airborne noise, and ground-borne vibration — despite their relevance to aquatic species, shoreline communities, and DND infrastructure.

Liquid Discharges

The table incorrectly states that water is "not altered." Water will be altered by:

- temperature changes
- pressure and shear forces
- entrainment of organisms
- antifouling chemicals
- sediment mobilization

Solid and Hazardous Waste

Omitted:

- total excavated limestone
- lakebed tunnel spoil
- contaminated soils from UXO clearance
- blasting residues
- tunnel boring machine lubricants

UXO Clearance and DND Land Disturbance

"Munitions scrap" is an understatement; UXO clearance can generate hazardous materials requiring full characterization.

UXO clearance and decommissioning of DND infrastructure for excavation of the upper reservoir involve deep disturbance of soils that may contain contaminants.

The Project Description must include:

- contamination screening
- soil and groundwater protection measures
- protocols to prevent mobilization of contaminants into Georgian Bay

We acknowledge that these items are subject to provincial oversight and that third party activities occurring on federal land are not necessarily subject to provincial environmental laws. However, we request a commitment by TC Energy to evaluate these items as part of the EA to provide the basis for the Canadian Federal government to enter into administrative agreements with the Province of Ontario to coordinate management of these activities, so as to ensure they meet provincial standards, as allowable under Section 9 of CEPA. We feel this is particularly necessary for third party-managed commercial and industrial activities occurring on federal land, which could be caught in the regulatory gap between provincial and federal legislation.

In Summary

GFB has addressed the following:

1. Mischaracterization of a major port facility as "potential Marine Access."
2. Excavation of a 1,000-MW underground powerhouse cavern within the Niagara Escarpment, a globally significant geological feature.
3. Tunneling into Georgian Bay for intake/outlet structures with substantial benthic, hydrodynamic, and water-quality impacts.

4. Misleading implication that water is cycled "within the Reservoir," obscuring the fact that Georgian Bay is the lower reservoir in an open-loop system.
5. Omission of quagga mussel fouling and associated antifouling chemicals or mechanical systems, despite GBF raising this issue repeatedly since 2021.
6. Absence of decommissioning plans for the preferred option and all alternatives, preventing IAAC from evaluating full lifecycle environmental, hydrological, geotechnical, and socio-economic impacts.
7. Reliance on non-committal mitigation language ("where feasible") for karst terrain, despite acknowledged karst conditions beneath the proposed reservoir, preventing IAAC from evaluating geotechnical safety, groundwater interactions, and long-term structural viability.
8. Incomplete treatment of risks to municipal and private drinking water intakes.
9. Absence of a cumulative-effects assessment, despite multiple interacting environmental, hydrological, geotechnical, cultural, and socio-economic impacts that cannot be meaningfully evaluated in isolation.
10. A Project Description that lacks a coherent, integrated analysis of environmental effects across project components, resulting in fragmented and incomplete assessment tables
11. A "Potential Effects" table (Table 11-1) that systematically minimizes or omits the project's most consequential environmental, socio-economic, cultural, and Indigenous impacts.
12. A Waste and Emissions table (Table 12-1) that omits major waste streams, including $PM_{2.5}$ and other criteria air contaminants, hydrological alterations, chemical discharges, underwater noise, contaminated soils, and UXO-related hazardous materials.

Until these issues are addressed, the Project Description does not meet the standard required for a robust federal impact assessment.

GBF notes that the proponent's closing statement emphasizes system-level benefits while omitting substantial environmental, hydrological, cultural, and socio-economic risks. These assertions remain unverified and must not substitute for the detailed, evidence-based analysis required under the Impact Assessment Act.

Thank you for the opportunity to provide comments. Georgian Bay Forever would welcome further dialogue with the Agency as the review proceeds.

Sincerely,

Robert Turner
Board Chair, Georgian Bay Forever

David Sweetnam
Executive Director, Georgian Bay Forever