

REVISED AND CORRECTED June 16, 2010

CRITICAL NOTES ON DRAFT SCREENING REPORT – AIRPORT EXPANSION
HALIBURTON STANHOPE, PROJECT # 09-01-46567

SUMMARY OF OBJECTIONS –

The Responsible Authority has failed to consider detailed and well supported information submitted by the public with regard to the scoping of the project. As a result, the draft report fails to properly assess numerous inevitable impacts and risks associated with the construction, operation and maintenance of the proposed second runway, as well as the cumulative impacts of planned subsequent phases of the proponents' over-all expansion plan. These include; further expansions to apron and taxi-ways; numerous commercial hangar installations; light industrial development; residential "air-park" development – predicated on the addition of the second runway and integral to the proponents' plans for "financial sustainability" and "economic development"

Neither the proponents' information nor the DRAFT Report fully and clearly identify all areas of impact outside the airport property boundaries, nor do they recognize the on-going and cumulative nature of these impacts or their true spatial extent.

Generally speaking, an assessment process would have included a scoping, prior to the initiation of the screening, which would have been subject to comment and discussion. This would have afforded both sides the opportunity to justify their interpretations / assertions and, ultimately, resulted in a complete and valid screening. Unfortunately, it is only with the publication of the DRAFT that the insufficient scoping of the project and assessment has been revealed.

Most of the insufficiencies and criticisms below stem from this one fault in the process.

We also note that the very brief period allowed for public comment on the Draft Report is onerous given the geographic dispersal of constituents of the Township of Algonquin Highlands; these difficulties were previously recognized by the RA and verbal undertakings to maximize consultation and input opportunities were made at the July, 2009 Public Information meeting.

Headings and subs below refer directly to those used in the Report.

2.0 PROJECT DESCRIPTION

* Implementation of GPS Instrument Approaches noted, while planned APAPI implementation is not. APAPI approach implementation requires significantly lowered approach-slope obstacle limitation surfaces, therefore far greater impact with regard to tree removal and control than is indicated in design drawings submitted for this assessment. This is particularly significant in the areas immediately adjacent to airport property to the southern end of the proposed runway and at the eastern end of the existing runway as these approach areas will require far greater "obstacle management" on both sides of the Redstone river, some of which area is designated as an environmentally protected zone. (The take-off / approach area to the east of the current runway is currently out of compliance with TP-312 obstacle

limitation surface regulations *at the current , higher gradient*. Tree-topping / obstacle control in this area may very well need to be extended beyond property boundaries.)

Additionally, these lowered approach slope heights are likely to increase noise impacts and danger from accidents for residents very close to or directly beneath the take-off / approach terminal areas.

GPS approaches also often require greater clearances and lowered approach slopes; this requires a design evaluation for assessment of further impacts.

Adherence to TP 312 regulations, especially as regards GPS and APAPI approaches, as required by this DRAFT Screening Report will require far greater areas of tree-topping and removal than are indicated by the design drawings submitted by the proponent.

In order to properly assess the full impact of “obstacle removal and control” requirements, a full and detailed survey of all areas requiring such measures must be a part of this assessment. Drawings must be prepared showing ALL areas affected by actual designed approaches using the lowered slopes and greater width clearances required by APAPI and GPS approach implementation.

This will also allow the proponent and the Responsible Authorities to accurately identify and enumerate of properties and levels of impacts on private lands, which must be considered under Socio-Economic Impacts (sect. 3.2)

* While the expansion / modernization (replacement?) of the existing public building is noted as part of “cumulative impacts”, the longer term plans for the addition of numerous hangars, additional apron and taxi-way areas, light industrial uses and a large residential development on airport lands have not been considered.

These plans are within the documentation submitted by the township in the application for funding, are clearly intended as further phases of the expansion and must be considered within this assessment under cumulative impacts of the project. The proponent must supply all information relating to planned expansion for inclusion in the assessment if it has not already done so.

“Purpose of the proposed activities...”:

The airport, as currently configured, delivers all the “essential” aviation services that are available or likely to be made available to the area. The opponents of the project have presented information refuting claims of increased Air Ambulance service and DND / S&R, specific aircraft used to provide these services cited by the proponent will be unable to use the new runway as designed.

Local and regional historic experience indicate that significant increases in economic and business development are extremely unlikely to occur as a direct result of the construction of a longer runway – the target market of aviation dependant business is too small and other opportunities already exist at airports closer to markets, infrastructure and other services, one of which is less than 45 minutes by road from Haliburton Stanhope.

As stated in the draft report, the second runway will be preferential only under “certain wind conditions; this will result in a useability increase of less than 5% according to proponents consultants. In addition, there has been no on-site wind study and the new runway alignment is surrounded by hills which are likely to cause turbulence and wind-shear, further reducing safety and utility.

An assessment must balance likely negative effects against likely benefits. The “purpose of the proposed activities” must properly justify any impact whatsoever, particularly when dealing with a non-essential infrastructure project. An informed public has rejected these “justifications” and strongly opposes the project as having no significant benefit and unacceptable costs.

3.0 SCOPE

3.1 Scope of Project

The scope of this project must include future phases as noted above; the second runway is clearly the intended first phase of a much larger project as indicated in proponents documents. The Responsible Authorities must review Township documents which are the foundation of the expansion proposal (see attached) and include this information in the assessment.

Tree-topping / removal / obstacle control on approaches mentioned only during construction phase.

Adherence to TP-312 and maintenance of operating clearance minima requires on-going tree-topping and removal over the life of the facility. Planning horizon of 50+ years means that these impacts will be ongoing and that the affected area will, in fact, increase with time. Additionally, necessary restrictions imposed by obstacle clearance and other concerns will curtail or obviate subdivision of and construction upon certain of the affected private lands, reducing or eliminating potential use by or profit to the owners.

These impacts must be considered as both on-going during the operation and maintenance phase AND as cumulative impacts of the project. As noted above, a full survey and documentation of areas to be affected must be undertaken and reviewed if a valid assessment is to be considered complete.

3.2 Scope of Assessment

* “Effects of Malfunctions or Accidents” has not been interpreted to include malfunctions or accidents involving the actual USE of the proposed runway by aircraft. (Maintenance and Operation phase)

The alignment of the new runway places a number of residences directly under or less than 100 metres from the center line of the approaches and within 500 metres of the threshold of the runway. This is the area of greatest risk in flight profiles and the location of the great majority of air-accidents. Any additional risk must be considered in this assessment as a negative impact to human health and safety.

- * As the Responsible Authorities are well aware, comments from the public have been overwhelmingly negative and address a wide range of concerns. This opposition must be given sufficient weight in assessing impact / benefit.
- * “Measures that are technically and economically feasible...to mitigate...” The public at large does not feel that the project itself is economically feasible and no hard evidence has been presented by the proponent to support its’ assertions; No adverse environmental effects are justified, no matter how slight, and actions to mitigate such effects only serve to reduce the feasibility of the project.
- * The “specific spatial boundaries” considered are insufficient in view of the ongoing and expanding areas of impact with respect to on-going obstacle removal and control as noted above. The footprint of the airport as a sufficient study area is considered unacceptable, as off-property impacts are extensive and include two areas listed as “Environmentally Protected”. The area noted in Section 4.5 as being MNR owned, also includes private properties and a protected zone; the extent of tree removal in this area which has no road access will be in excess of 400 metres in width with an as yet undetermined length along the flight path. (Need for proper survey to assess)
- * Impacts to WATER (in particular, ground water quality and quantity) must be assessed in light of the overall development plan, including increased hangar, industrial and residential developments proposed by the proponent. (See above)
- * “Socio-Economic Impacts” must be interpreted to include real social and economic impacts beyond human health; Numerous area residents and landowners will be subject to disturbance, lack of enjoyment of property, loss of privacy and integrity of property (on-going access to properties for the purpose of maintaining obstacle clearances) and the resulting reduction or elimination of property values which are, for many, the largest store of personal wealth and the foundation of retirement planning.

The very limited general benefits (if any) that may be expected from this project cannot be considered to justify the stress on and dislocation of lives or the destruction of value to personal holdings.

With respect to Table 2 –Interaction Matrix: Impacts on Human Health and “real socio-economic conditions” surrounding the project area must be added to the Construction Phase and the Operations and Maintenance Phases; Accidents and Malfunctions must also be regarded to have impacts on Human Health and Socio-Economic conditions throughout the life of the project; Ancillary Works must include future phases as outlined above, and must be considered to have impacts on Ground Water Quality and Quantity, and on Vegetation / Wetlands.

In summary, the Scope of the Project is considered to be insufficiently broad and appears to completely dismiss reasonable concerns properly presented to the Responsible Authorities by the public. The result is a Draft Screening Report which does not respond to many of the most important points brought forward in detail during the period of initial public comment. To all appearances, the Responsible Authority has accepted only the information provided by the proponent as worthy of consideration.

4.0 EXISTING ENVIRONMENT

4.3 Sensitive Natural Areas

* Insufficient study outside the footprint of the airport precludes a valid assessment of some areas, particularly with respect to the wetlands adjacent to the south approach to the proposed runway. This area, which comprises portions of the Redstone and Gull rivers as well as Green Lake is a vibrant riparian zone with acknowledged fish spawning, bird feeding and breeding activity will be exposed to impacts from obstacle control (tree removal, etc.) and from accidents and malfunctions of aircraft on take-off and final approach phases.

As noted above, the area to the north-west of the proposed runway is essentially un-investigated from any point of view.

THE CURRENT DESIGN DRAWINGS ARE BASED ONLY ON 5% APPROACH SLOPES – APAPI REQUIREMENTS ARE FOR APPROX. 4%. At a distance of approximately 1700 metres, as in the case of lands to the north-west of the proposed new runway alignment, this would require a lowering of the obstacle limitation surface by 17 metres; greater than the height of many of the trees in areas acknowledged to be affected.

This assessment must include definition and ground investigation of these areas and their risks for adverse effects.

* Estimated impacts on the single private property specifically mentioned with regard to “tree-topping” must be revised in light of lowered approach / take-off slopes required by the design. In addition there are further properties in this area where extensive topping and removal will be required, including one residence which is within 100 metres of the south threshold of the proposed runway.

No reassessment of clearance requirements at the west end of the existing runway has been undertaken. It is likely that this approach will require topping as well.

Without full identification and ground investigation of all areas subject to impacts over the life of the project, there can be no valid assessment.

4.6 Wildlife Hazard Assessment

Site surveys in June and July (less than 2 days total on the ground) were insufficient and ill timed to properly assess numbers of large mammals frequenting the area and the property in general.

As the area has long been “out of use” it has become a refuge and feeding ground for deer and moose (which frequent the area planned for the storm-water management pond and adjacent Redstone river banks, in particular) in significant numbers in spring and fall. Deer and black bear are present year-round. This is common knowledge among local residents. (Community or Aboriginal Knowledge)

The portion of the property to be covered by the proposed runway forms part of an east – west corridor for the movement of many large mammals, which will be cut off by the expansion.

At the minimum, wild-life control / exclusion fencing must be emplaced to mitigate hazards to both wildlife and aircraft safety. This measure was recommended by consultants and was a part of the original design and budget for the expansion and appears to have been dropped for purely economic reasons.

With respect to statements in sect. 4.5 and sect. 5.2.6 characterizing tree-topping and complete vegetation removal as potentially beneficial due to the increase in nesting and feeding opportunities for birds directly beneath approach slopes in topped and dying trees, and the increase in grassland habitat for birds (and presumably grazing mammals) at the side of active runways, we can merely wonder at the absurdity.

6.0 PUBLIC AND ABORIGINAL CONSULTATION

6.1.1 (Federal) Public Component

All of the above points have been communicated to the Responsible Authorities over the span of the Screening process and have been insufficiently addressed.

The level of public participation and opposition to the project, and the number of concerns expressed must be given more weight in the assessment. (See below)

6.2 Municipal Consultation

As may be seen by the list of actions by the proponent, no opportunity at all has ever been afforded to the public for comment, question or response from the proponent. All public meeting comments and questions were limited to questions on technical points directed to consultants.

The use of the term, “consultation” is more than merely inaccurate; the proponent has presented a string of faits accomplis, nothing more. Representatives of the proponent have publically and repeatedly refused to discuss or acknowledge any of the detailed opposition points or alternatives to the proposed expansion project.

7.0 FOLLOW-UP PROGRAM

As this assessment is considered to be incomplete for all of the reasons cited above, it is premature at this point to rule out the imposition of a follow-up program.

At a minimum, a follow-up program to monitor the adherence to TP-312 requirements for obstacle clearances and the manner and extent of tree-topping / removal operations over the life of the project must be considered. These are residual and cumulative impacts which require monitoring and mitigation.

The Responsible Authorities will be aware that the breadth and intensity of public opposition to this project are such that no impacts whatever will be considered to be acceptable. The RA’s have seen

that this opposition is not merely a small group of individual landowners with immediate concerns only for their property values, but a general recognition of the lack of any valid justification for the project or general benefit to those who will be affected by it in any way, be it through costs, loss of enjoyment of lands or the irrevocable loss of the valued environment and “atmosphere” of the area we have all chosen to inhabit.

CONCLUSION / RECOMMENDATIONS

The opponents of this project have made extraordinary efforts, over years, to discuss alternatives and reductions in the scope of the rehabilitation / expansion of the current facility and different approaches to increasing the value to the township of the infrastructure; all without significant response.

Should the CEAA not see fit to alter the scoping of the project and assessment as indicated above, the opponents of this project would insist that the assessment be referred to a MEDIATOR or REVIEW PANEL, pursuant to Sections 20 and 29 of the Canadian Environmental Assessment Act – extract below with emphasis added by the author.