

Jennifer Clark - Senior Environmental Review and Approval Officer  
Infrastructure Canada  
605-90 Sparks Street Ottawa, ON  
K1P 5B4

July 24th, 2009

Ms Clark,

I was unable to attend the Information Session on Thursday, July 23, 2009, "Environmental Assessment for the Proposed Expansion to the Township of Algonquin Highlands Airport."

Please accept for consideration of inclusion in the current scoping / Screening of CEAR project # 09-01-46567.

The following points are important to the proper Environmental Assessment / Screening of the project.

### **Completion of Project Description**

The Township of Algonquin Highlands / RA project description for purposes of the environmental assessment is currently limited to the construction of a second runway and the rehabilitation of the existing airstrip. The second runway is a component of a much larger development as stated in the townships Business Vision document, including a "residential airpark" development, light industrial development and terminal building / hangar expansion. In effect and as stated in available documents, the construction of the second runway is the first stage of the proposed development for the site.

The current project description does not include all aspects of the proposed development for the site. To avoid project splitting and properly assess all impacts the environmental assessment should include all aspects of the proposed development, not just the second runway but the airpark and industrial developments, as stated in documents submitted by the Township to the Responsible Authority.

### **"Natural Heritage Assessment"**

The 2008 Airport Development Project Report included a rudimentary Natural Heritage Assessment (June 10 and July 13, 2008 site visits) limited entirely to "original" airport lands and lands recently purchased and expropriated for the purpose of constructing the new runway.

As a consequence, the evaluation of possible impacts of the proposed project (new runway, light industry and residential complex) on site as well as off site is not adequate to complete a proper evaluation of potential or cumulative environmental impacts.

The study area should be increased to include:

- the environmentally protected area along the Redstone and Gull Rivers as identified in the county municipal lands and where potential for SAR have been identified by the MNR, and to the north-west of the airport property,
- areas of proposed tree cutting at both the southern and northern (area of Airport and Barry line, northern ridge) extensions of the second runway and the proposed residential and light industry sites.

**Environmental Baseline studies** were conducted during spring breeding season but did not include a fall migration survey. A fall survey should be conducted.

The further studies required:

- studies to identify Species at Risk (SAR) flora and fauna habitat beyond airport property boundaries to include the enclosure
- fish habitat(s) as potentially affected with sedimentation, pollution, de-icing – the proposed engineering design did not consider potential impacts of de-icing fluid and other potential industrial wastes
- water quality studies (area of Redstone river and Gull river)
- cultural and archaeological survey should include all lands proposed for airport and industrial development
- proper survey of tree cutting on private property in area of the flight lines at both ends of the second runway
- Identification of what trees will have to be cut over the next 20 years
- Wildlife habitats and migration fall survey
- Detailed review of 3 dumps and potential bird strikes (2008 site visit completed in one day – no follow-up was completed)
- Wind survey – data logger at existing weather station should be installed to collect onsite data. The second runway will be built between two hills – the wind shear factor of these hills is unknown due to the lack of on site data.

**Social Impacts** of the second runway have not been properly addressed - impacts on neighbouring properties include:

- tree cutting and loss of access control by owners
- noise impacts due to low overflights
- increased taxes to support project
- Change in character of the area
- Impact on existing businesses – artisans etc
- Safety issues; take-off and landing over residential areas
- Decreasing property values associated with the above

### **Sustainable Development**

The economic sustainability of the project has not been properly evaluated. To do this the proponent will have to include all costs associated with the development of the project, review potential alternatives and complete a cost benefit analysis; The current budget for the development of a second runway does not include all costs. The budget should be transparent and include costs such as:

- to complete a full environmental assessment,
- cost to acquire the right to cut trees on private lands
- costs to operate second runway

All of the costs associated with the development of the project have not been clearly identified therefore the potential economic benefits cannot be defined.

## Consultation

The Proponent has held a single “information session” (Sept. 2008) to present the 2008 engineering report. **No meaningful consultation** with the public and property owners directly affected by the project has been conducted by the Proponent; The Proponent:

- Has not consulted with residents of the Proponent, no public meetings open houses or updates have been provided
- Has not consulted with all the property owners directly impacted by the airport (residents in the area of airport road, Barry Line, Green Lake Road, Maple Lake and Cameron Lake)
- Has not addressed the direct impacts the new runway will have on residents located under northern flight line of the new runway consequently the Proponent has not notified these residents of potential impacts (tree cutting etc)
- Has not adequately demonstrated the **need** to build the new runway
- Has not consulted with the public on the real economic costs associated with the new runway or the proposed industrial and residential developments
- Has not considered alternative economic development proposals