

**Lake Simcoe Regional Airport
(LSRA) Solar Project -
Decommissioning Plan Report**

DRAFT REPORT



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File No. 160950886
July 6, 2017

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Abbreviations

ERCP	Emergency Response and Communications Plan
HONI	Hydro One Networks Inc.
IESO	Independent Electricity System Operator
kV	kilovolt
LSRA SEP	LSRA Solar Energy Partnership
LSRCA	Lake Simcoe Region Conservation Authority
MNRF	Ministry of Natural Resources and Forestry
MOECC	Ministry of the Environment and Climate Change
O. Reg.	Ontario Regulation
REA	Renewable Energy Approval
ROW	right-of-way
the airport	Lake Simcoe Regional Airport
the Project	LSRA Solar Project
the Proponent	LSRA Solar Energy Partnership

LAKE SIMCOE REGIONAL AIRPORT (LSRA) SOLAR PROJECT - DECOMMISSIONING PLAN REPORT

Introduction
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1.0 INTRODUCTION

1.1 PROJECT OVERVIEW

LSRA Solar Energy Partnership (LSRA SEP or the Proponent) is proposing to develop, construct, and operate the Lake Simcoe Regional Airport (LSRA) Solar Project (the Project) in the Township of Oro-Medonte, within the County of Simcoe, Ontario. The Project was awarded a power purchase contract with the Independent Electricity System Operator (IESO) in March 2016. The Project requires a Renewable Energy Approval (REA) as per Ontario Regulation (O. Reg.) 359/09 (as amended May 2016) under Part V.0.1 of the Ontario *Environmental Protection Act*. The Proponent has retained Stantec Consulting Ltd. (Stantec) to prepare the REA application, as required under O. Reg. 359/09.

The proposed 6.75 megawatt (MW) Project is considered a Class 3 Solar Facility according to subsection 4(1) of O. Reg. 359/09. Project components that are located on Lake Simcoe Regional Airport (the airport) lands include: solar panels and racking, access roads, inverters and transformers, a substation (if required), communications tower (if required), underground electrical lines, perimeter fencing, and temporary construction areas. In addition, overhead or underground electrical lines will carry the electricity south along the Line 6 North municipal road right-of-way (ROW), crossing under Highway 11, to the existing 44 kilovolt (kV) circuit located south of Highway 11 near the intersection of Line 6 South and Guest Road. Maps showing the Project Location¹ (**Figure 1**) and proposed facility components (**Figure 2**) are provided in **Appendix A**.

1.2 REPORT REQUIREMENTS

This Decommissioning Plan Report describes the Project activities planned during the decommissioning phase so that potential negative environmental effects may be identified and mitigation measures can be proposed where required.

The Decommissioning Plan Report is one component of the REA application for the Project and has been prepared in accordance with O. Reg. 359/09 and the Ministry of the Environment and Climate Change (MOECC)'s *Technical Guide to Renewable Energy Approvals* (MOECC 2017). **Table 1.1** summarizes the requirements of this report as specified under O. Reg. 359/09 and provides a cross-reference to where the information can be found in this report.

¹ The term "Project Location" is defined by O. Reg. 359/09 as: a part of land and all or part of any building or structure in, on or over which a person is engaging in or proposes to engage in the project and any air space in which a person is engaging in or proposes to engage in the project.

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**Table 1.1: Decommissioning Plan Report Requirements
(as per O. Reg. 359/09 – Table 1)**

Requirements	Section Reference
Set out a description of plans for the decommissioning of the renewable energy generation facility, including the following:	
1. Procedures for dismantling or demolishing the facility.	Section 3.1 and 3.2
2. Activities related to the restoration of any land and water negatively affected by the facility.	Section 3.3
3. Procedures for managing excess materials and waste.	Section 3.4

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Probable Future Use of the Project Location
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2.0 PROBABLE FUTURE USE OF THE PROJECT LOCATION

The Project is anticipated to have an operational lifespan of 20 or more years. At the end of the Project's lifespan, the Project components are expected to be decommissioned and the lands restored as described in Section 3.0. If Project economics remain viable at that time, the facility could be "repowered", and continue operating for an additional extended period. This process may include the replacement and/or upgrading of Project components based on technology at the time. Prior to continued use of the Project Location by the Proponent, approval would be required from the airport, and consultation activities would occur as appropriate and as required by current regulations and requirements. However, for the purpose of this report, it is assumed that the Project will be fully decommissioned at some point in its life cycle.

It is anticipated that after decommissioning, the majority of the Project Location lands at the airport will be returned to their current 2017 land use as agricultural lands, vegetated buffer areas, and/or forested land. However, the intended post-Project land use will be confirmed with the airport prior to decommissioning to determine whether lands are to be restored to their original condition or will be used by the airport for other purposes. Information in the Decommissioning Plan Report will be updated, if required, in advance of decommissioning. The updated report would consider the airport's land use requirements, any changes to decommissioning activities and associated mitigation measures, and applicable regulatory requirements in effect at that time. It would also contain updated maps showing the exact location of project components for decommissioning (i.e., the final electrical line option in the municipal ROW).

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3.0 DECOMMISSIONING

At the end of the Project's life (whether that occurs as a result of abandoning the Project early or after the power purchase agreement's lifespan), the Project components are expected to be decommissioned and the lands restored to their pre-construction condition. Decommissioning activities are expected to take 3-6 months.

3.1 DECOMMISSIONING DURING CONSTRUCTION (ABANDONMENT OF PROJECT)

In the unlikely event that construction cannot be completed and decommissioning of the Project is required during the construction phase, restoration of lands to pre-construction conditions will follow the same procedures as for decommissioning at the end of the Project's operational life, as described in the sections below. The extent of environmental protection measures required for decommissioning during construction would depend on the construction progress made at the time of Project termination.

Experienced professionals, including aquatic and terrestrial biologists and environmental engineers, would determine which construction mitigation measures (e.g., erosion and sediment control fencing) could be used during decommissioning, and which additional measures would be required. Depending on the amount of land cleared at the time of Project abandonment, these same professionals will determine which of the site restoration measures listed in this report are required.

3.2 DECOMMISSIONING AFTER CEASING OPERATION

It is anticipated that the Project would have an operational lifespan of 20 or more years. The Project's life could be further extended with proper maintenance, component replacement and repowering (see **Section 2.0**). For this section of the Decommissioning Plan Report, it is assumed that the Project will be decommissioned at the end of the 20-year power purchase agreement with the IESO.

All decommissioning and restoration activities will be performed as per the requirements of relevant governing agencies, and will be in accordance with relevant statutes in effect at the time of decommissioning and with consideration of industry standard practices.

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3.2.1 Pre-Dismantling Activities

The Project will be de-energized and isolated from all external electrical lines. Temporary erosion and sedimentation control measures and other environmental protection measures would then be implemented. It is assumed that temporary construction areas will be required for storing equipment and components removed from the site, and for activities similar to those during the construction of the Project. These temporary lands may be located where the original temporary construction areas are delineated on **Figure 2**. Use of the temporary construction area north of the runway will be minimized to reduce the need for clearing of lands that were re-vegetated after construction of the Project. The associated negative environmental impacts and prescribed mitigation and restoration measures from the construction phase will apply (see Section 5 of the Construction Plan Report).

3.2.2 Equipment Dismantling and Removal

The following subsections describe the process that will be undertaken to dismantle the various components associated with the Project and provide a brief overview of the potential environmental effects associated with each decommissioning activity. The majority of potential environmental effects related to decommissioning are similar to those during construction and are detailed, along with mitigation measures, in Section 5 of the Construction Plan Report.

All components and materials will be removed from the site by truck unless the airport can make use of them (e.g., granular material). **Table 3.1** summarizes how the materials will be reused, recycled or disposed of.

3.2.2.1 Solar Panels and Racking

Solar panels will be disconnected from the electrical system and unfastened from the mounting rack by hand. The fixed racks that support the solar panels and foundations would be removed by equipment. If concrete foundations are installed, they will be removed to a depth of 1m below grade. The dismantled materials will either be stockpiled in the temporary construction area or directly loaded onto trucks as they are dismantled. Potential negative environmental effects are primarily related to the removal of racking and may include soil erosion and sediment transport to water bodies or natural heritage features such as wetlands, woodlands and wildlife habitat. The transport of solar panels and racking by truck may result in localized exhaust emissions, dust, and temporarily increased traffic on local roads.

3.2.2.2 Inverter Stations and Electrical System

Step-up transformers would be drained of oil and removed, along with their associated inverters and their concrete pads/foundations. Potential negative environmental impacts will be related to soil disturbance as discussed above for solar panels and racking, and the potential for spills related to the removal of oil.

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Underground electrical lines are anticipated to be approximately 1.0 m below grade, and will be removed by trenching and/or pulling. As per the lease with the airport, underground cables may be left in place in some circumstances; a final decision will be made at the time of decommissioning. Underground electrical lines in the municipal ROW may be removed in consultation with the municipality. Any above-ground electrical lines and poles in the ROW may be removed in consultation with the municipality and local utility companies. Potential negative environmental effects for removal of electrical lines are similar to those during construction, and may include temporary loss of wildlife habitat (for trenched lines in the municipal ROW), accidental intrusion into adjacent wetlands, woodlands or wildlife habitat, disturbance to wildlife, and vegetation removal beyond the area to be decommissioned. Dust generation and sedimentation of natural features and water bodies may occur.

If required, the Project's interconnection infrastructure to the electrical power distribution infrastructure owned and operated by Hydro One Networks Inc. (HONI) will be removed in accordance with HONI requirements at the time of decommissioning.

3.2.2.3 Substation and Switchyard

If a substation is required for the Project, the oil containment pit would be examined for leaks/spills from the transformer prior to removal of the transformer. All above-ground electrical and other equipment including switches, breakers, relays, housing for relays, and SCADA equipment will be removed. The concrete foundations, oil containment pit, and granular and geotextile materials would be removed. Potential negative environmental impacts will be related to soil disturbance as discussed above for solar panels and racking, and the potential for spills related to the removal of oil.

3.2.2.4 Access Roads

As per the lease with the airport, access roads may be left in place in some circumstances. Where they are to be removed, the granular and geotextile materials, along with any culverts installed for storm water flow, will be removed. Potential negative environmental impacts will be related to soil disturbance as discussed above for solar panels and racking. It is not expected that the new or upgraded culvert planned for Line 6 North where Shellswell's Creek passes below the road will be removed.

3.2.2.5 Other Components

Fencing installed for the Project will be removed in consultation with the airport. The communications tower (if one is required) will be dismantled and removed. Potential negative environmental impacts will be related to soil disturbance as discussed above for solar panels and racking.

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3.3 SITE REHABILITATION/RESTORATION

Most of the lands within the Project Location at the airport are currently leased for agricultural purposes with a smaller amount of land that is forested and meadow that is maintained as a vegetated buffer. Assuming that at the time of decommissioning the airport will resume its agricultural land use, a Rehabilitation Plan will be designed to restore lands affected by the Project to a state suitable for this use. Previously forested lands and those maintained as a vegetated buffer will also be restored.

The Rehabilitation Plan will be prepared prior to decommissioning and should include (or update) the information detailed below.

3.3.1 Agricultural Lands

Agricultural lands that have become compacted due to facility operation or decommissioning activities (e.g., where access roads are located) should be de-compacted using suitable equipment.

Minor regrading may be required to even out the land surface. The grading should be done in a way that will not impact the flow of surface water to natural features, water bodies and nearby Lake Simcoe Region Conservation Authority regulated areas. If more than minor grading is required, it would be in consultation with the airport and the Lake Simcoe Region Conservation Authority (LSRCA).

Following grading, and if approved by the airport, topsoil, if required, would be added to improve nutrient content of the existing soil for agricultural purposes. It would be of the same or similar soil type and texture as the material in place prior to construction at the Project Location and would be inspected and/or tested prior to importation to prevent transmission of agricultural pests to the property. The land would be planted with crops and/or other vegetation by the airport or their lessee to stabilize the soil. Depending on the time of year, the land may need to be temporarily seeded with a fast-growing native species cover crop (approved by the airport) to prevent erosion and loss of topsoil while waiting for the planting season. Erosion and sediment control measures should be installed adjacent to ditches and left in place until the cover crop is fully established.

There are currently no artificial agricultural drains in the agricultural lands at the airport and so no repair of drains is anticipated.

3.3.2 Vegetated Buffer and Forested Lands

Meadow lands that are currently maintained by the airport as a vegetated buffer will be restored using the same process as for agricultural lands but may not require the addition of topsoil. The land will be re-planted with a native species as required by the airport.

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Use of the northern temporary construction area will be minimized to the extent possible by using the lands previously occupied by solar panels and racking. If the northern temporary construction area is needed to store materials and equipment during decommissioning, and forested areas are removed (similar to the construction phase), the lands will require restoration. The lands would be de-compacted after the temporary construction area granular material is removed, and the soil restored as needed to re-establish native tree species and ground cover. Additional restoration details are available in Section 5.0 of the [Construction Plan Report](#).

3.3.3 Water Bodies

Water bodies (as per O. Reg. 359/09) have been identified within 120 m of the Project Location on airport lands and within the Project Location in the municipal ROW. It is not expected that water bodies will require restoration as a result of the Project's decommissioning activities.

Any proposed decommissioning works within or near watercourses will implement the mitigation and monitoring measures used during construction as described in Section 5.0 and Table 6-1 of the [Construction Plan Report](#). Site-specific mitigation requirements determined during the detailed design and permitting process will also be applied. Standard construction practices at the time of decommissioning will include erosion and sediment control measures to mitigate potential impacts to water bodies.

Decommissioning activities will be discussed with the airport and LSRCA as necessary, to determine applicable current guidelines, permitting, site-specific mitigation, and/or remediation plans that apply at the time of decommissioning.

3.3.4 Stormwater Management

Permanent stormwater management infrastructure is not anticipated to be required for the project (with the exception of access road culverts to allow for stormwater flow). If grading is required, it should be done in a way that will not impact the flow of surface water to natural features, water bodies and nearby regulated areas. Temporary stormwater management measures, similar to those used during construction, will be employed during decommissioning to mitigate potential erosion and sedimentation.

3.3.5 Municipal Road Allowances

Electrical lines located either above- or below-ground in the municipal ROW may be removed, in consultation with the Township of Oro-medonte, LSRCA, and utility companies as applicable. Where removal disturbs the ROW, the land will be restored to pre-construction conditions. It is expected that conduits directionally drilled under Highway 11 for the electrical lines will be cut below grade, capped, and left in place.

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3.3.6 Spills

Strict spill prevention and spill response procedures will be in place during construction, operation and decommissioning, and it is not expected that cleanup or remediation of lands affected by spills will be needed during decommissioning.

During decommissioning, oil from transformers will be removed prior to removal of transformers to minimize the potential for spills. However, there is the potential for small spills of oil or gas to occur during routine operation, maintenance and decommissioning. Should a spill occur that requires remediation of lands, this will be done in compliance with applicable regulations and in consultation with the MOECC to restore the lands to their pre-construction condition.

3.4 MANAGING EXCESS MATERIALS & WASTE

Prior to decommissioning the Project, the Proponent should complete a waste audit and prepare a waste reduction work plan in accordance with any applicable guidelines or requirements from the MOECC or relevant regulations in effect at the time of decommissioning.

Much of the facility would consist of reusable or recyclable materials; as a result, there would be minimal residual waste for disposal from decommissioning the facility. Typical waste materials and modes of disposal, recycling, or reuse are presented in **Table 3.1** below:

Table 3.1: Typical Solar Facility Decommissioning Waste Materials and Modes of Disposal

Component	Typical Mode of Disposal
Concrete foundations	Crush and recycle as granular material
Solar Panels	Reuse or recycle
Steel and/or aluminum racks and mounts	Salvage for reuse or recycle
Electrical Cabling	Recycle
Transformers, inverters and switchgear	Salvage for reuse or recycle
Granular material	Reuse or dispose of in landfill
Oils/lubricants	Recycle through licensed reprocessing company
Geotextile material	Dispose of in landfill
Fencing	Salvage for reuse or recycle for scrap
Electrical line poles if overhead line is used in ROW	If metal, salvage for reuse or recycle for scrap. If wooden, dispose of in landfill or recycle for other uses.
Miscellaneous non-recyclable materials	Dispose of in landfill

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Decommissioning Notification and Communications
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4.0 DECOMMISSIONING NOTIFICATION AND COMMUNICATIONS

Advance notification of decommissioning will be provided to the airport, Township of Oro-Medonte, the County of Simcoe, Aboriginal communities, the LSRC, other government agencies and the public. Notification may be in the form of letters, newspaper notices, phone calls and/or updates on the Project website. The Decommissioning Plan Report will be reviewed and updated as needed at least 6 months prior to the Project's retirement date, and if changes are required, a revised report will be provided to the MOECC.

The Emergency Response and Communications Plans (ERCP) detailed in the Design & Operations Report will be updated and used during the decommissioning of the Project. These plans include methods for informing the public, municipalities, Aboriginal communities, nearby landowners, other stakeholders, and relevant agencies about activities occurring at the Project site (from standard decommissioning activities to emergencies). The plans will also include contact information for the Proponent and/or general contractor responsible for decommissioning, methods for registering complaints, recording how complaints are managed, and methods for reporting spills to the MOECC. The Decommissioning Plan Report and/or ERCP will be updated prior to decommissioning with any additional notification and communication plans applicable at the time.

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Other Approvals
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5.0 OTHER APPROVALS

The Proponent would obtain authorizations, permits and approvals required at the time of decommissioning from the appropriate government and regulatory agencies/bodies. Authorizations, permits, and approvals that may be required at the time of decommissioning are provided in **Table 5.1**.

Table 5.1: Potential Decommissioning Permits and Approvals

Administering Agency	Permit / Approval	Rationale
MUNICIPAL		
County of Simcoe and/or Township of Oro-Medonte	Road Occupancy Permit	Prior to conducting any work within a ROW.
	Noise By-law Exemption	If decommissioning activities are required during the prohibited times outlined in the Township of Oro-Medonte Noise By-law No. 2012-167.
	Oversize/Overweight Load Moving Permit(s)	Required if the vehicle/load is greater than specified dimensions.
	Road Use Agreement (updated)	Road conditions survey to assess pre- and post-decommissioning conditions of municipal roads to be used for material delivery and equipment movement. Traffic and/or Transportation Management Plan showing adherence to road safety and suitability, including adherence to load restrictions on municipal roads.
PROVINCIAL		
LSRCA	Development, Interference with Wetlands, and Alterations to Shorelines and Watercourses Permit	Work within floodplains, water crossings, river or stream valleys, hazardous lands and within or adjacent to wetlands (as per O. Reg. 179/06)
MOECC	Record of Site Condition	A change of property use and/or ownership.
Ministry of Natural Resources and Forestry (MNRF)	Approvals under the <i>Endangered Species Act, 2007</i>	If provincially-listed Species at Risk or their habitat is present.
Ministry of Labour	Notice of Project	Notification before decommissioning begins.
Ministry of Transportation	Special Vehicle Configuration Permit	Use of non-standard vehicles to transport large components.
	Transportation Plan	Adherence to road safety and suitability.
	Highway Entrance Permit	Interference or obstruction of the highway.

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Other Approvals
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Table 5.1: Potential Decommissioning Permits and Approvals

Administering Agency	Permit / Approval	Rationale
	Change of Access and Heavy/Oversize Load Transportation Permit	Compliance with provincial highway traffic and road safety regulations.
	Wide or Excess Load Permit	Transportation of oversized or overweight loads that exceed the limits set out in the <i>Highway Traffic Act</i> . Compliance with provincial highway traffic and road safety regulations.

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LAKE SIMCOE REGIONAL AIRPORT (LSRA) SOLAR PROJECT - DECOMMISSIONING PLAN REPORT

Sign-off Page
July 6, 2017

6.0 SIGN-OFF PAGE

This document entitled Lake Simcoe Regional Airport (LSRA) Solar Project - Decommissioning Plan Report was prepared by Stantec Consulting Ltd. ("Stantec") for the account of LSRA Solar Energy Partnership (the "Client") to support the approvals and permitting process for the Client's application for a Renewable Energy Approval for the Lake Simcoe Regional Airport Solar Project in the Township of Oro-Medonte, Ontario. In connection thereto, this document may be reviewed and used by the federal, provincial and municipal government agencies participating in the approvals and permitting process in the normal course of their duties; and stakeholders may provide comment as part of the regulatory approvals process. Except as set forth in the previous sentence, any reliance on this document by any third party for any other purpose is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others, unless otherwise stated therein. Any unauthorized use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on unauthorized use of this document.

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7.0 REFERENCES

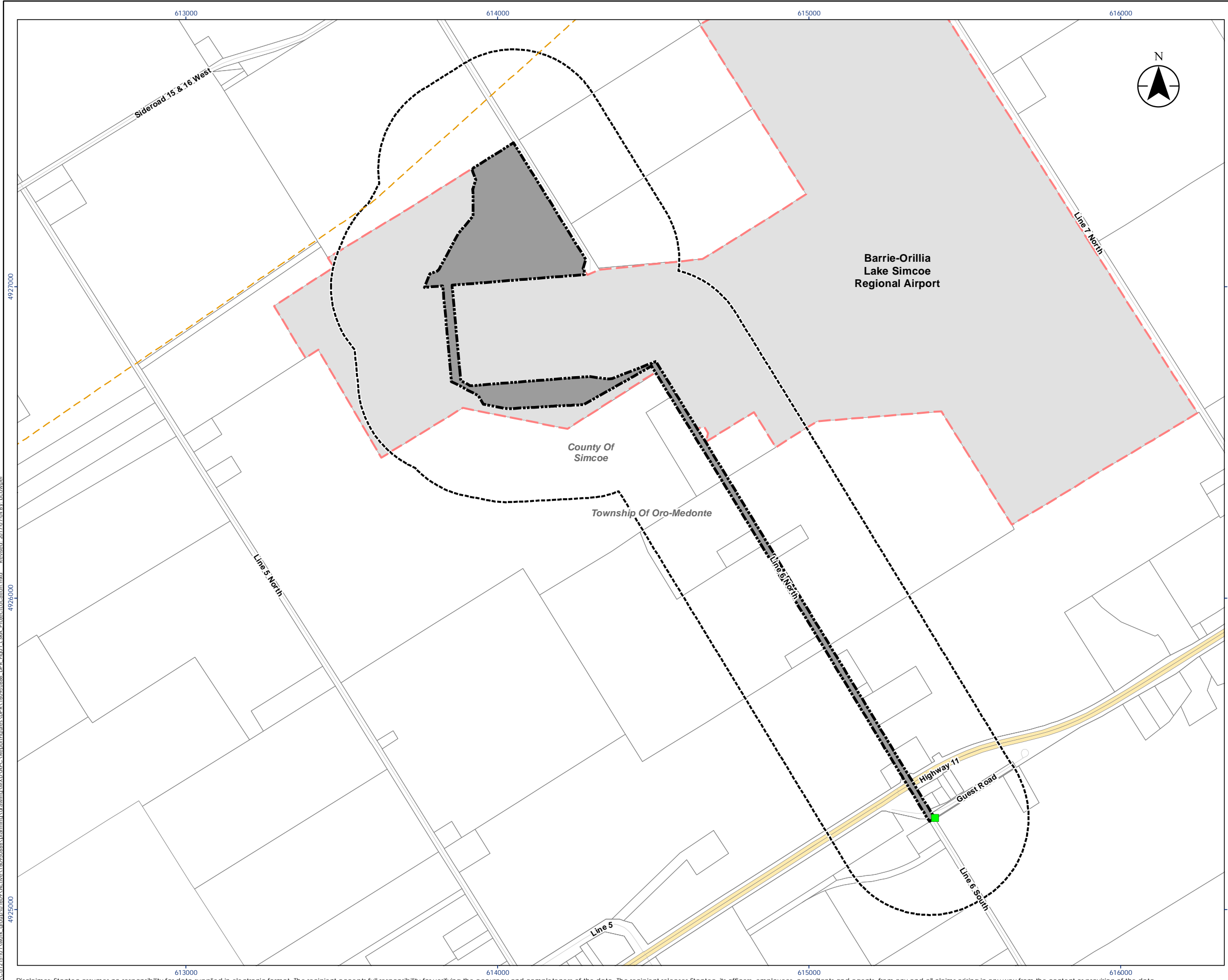
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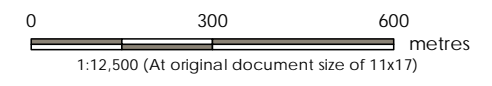
Renewable Energy Approvals under Part V.0.1 of the Act, O. Reg 359/09. Available at <http://canlii.ca/t/52q46>.

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APPENDIX A: FIGURES



- Legend**
- Project Location
 - Connection Point (CP)
 - 300m from the Project Location Boundary
 - Airport Lands
 - Expressway / Highway
 - Minor Road
 - Pipeline
 - Property Boundary



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2017.
 3. Orthoimagery Source: ©First Base Solutions 2017, imagery date 2016.



Project Location: Township of Oro-Medonte and County of Simcoe, ON
 Prepared by BCC on 2017-07-04
 Technical Review by ## on 2017-##-##
 Independent Review by ## on 2017-##-##

Client/Project: LSRA SOLAR ENERGY PARTNERSHIP
 LSRA SOLAR PROJECT
 DECOMMISSIONING PLAN REPORT

Figure No.

1

Title

Project Location


















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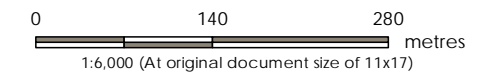
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Legend

-  Project Location
-  300m from the Project Location Boundary
-  Airport Lands
-  Minor Road
-  Pipeline
-  Property Boundary
-  Inverter Station
-  Communication Tower
-  Switchyard
-  Transformer Substation
-  Solar Modules
-  Overhead Electrical Line Option to CP
-  Underground Electrical Line Option to CP
-  Underground Electrical Line
-  Fence
-  Temporary Construction Areas
-  Access Roads and Turnaround Areas



- Notes
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2017.



Project Location: Township of Oro-Medonte and County of Simcoe, ON
 Prepared by BCC on 2017-07-04
 Technical Review by ## on 2017-##-##
 Independent Review by ## on 2017-##-##

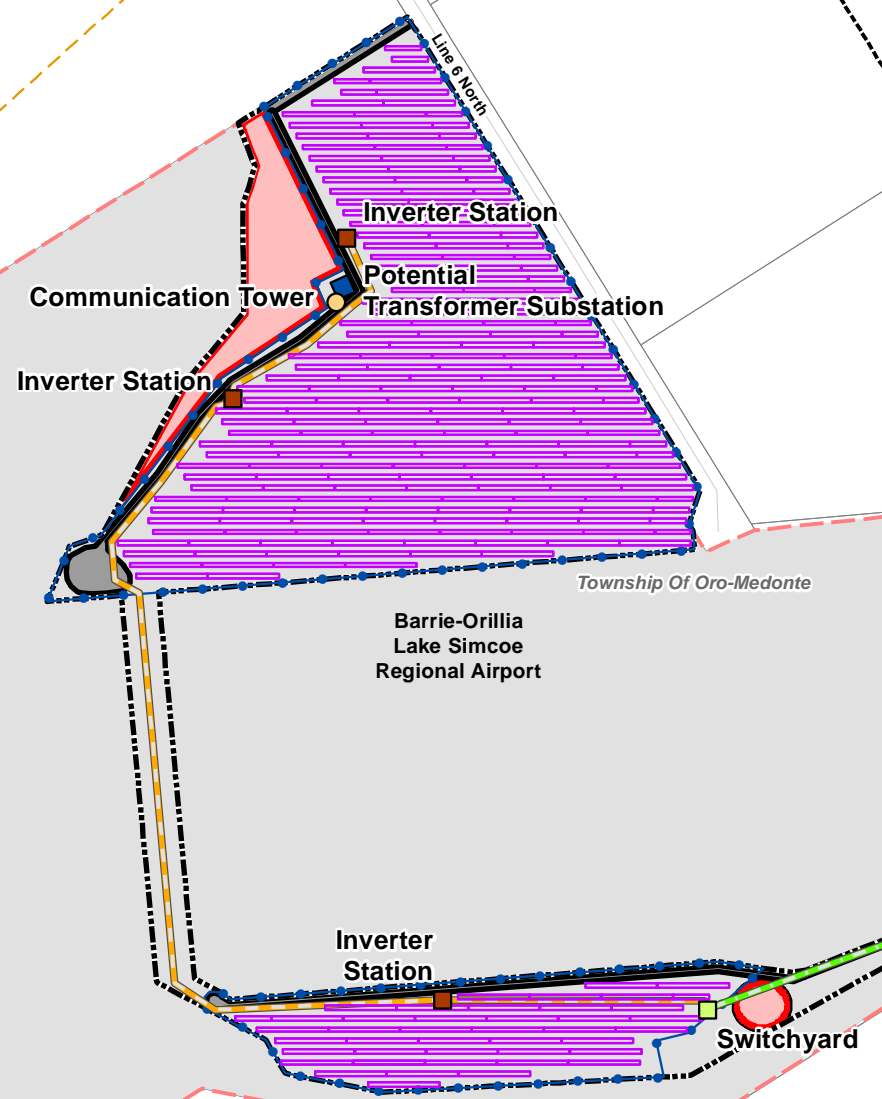
Client/Project: LSRA SOLAR ENERGY PARTNERSHIP
 LSRA SOLAR PROJECT REA
 DECOMMISSIONING PLAN REPORT

Figure No.

2.1

Title

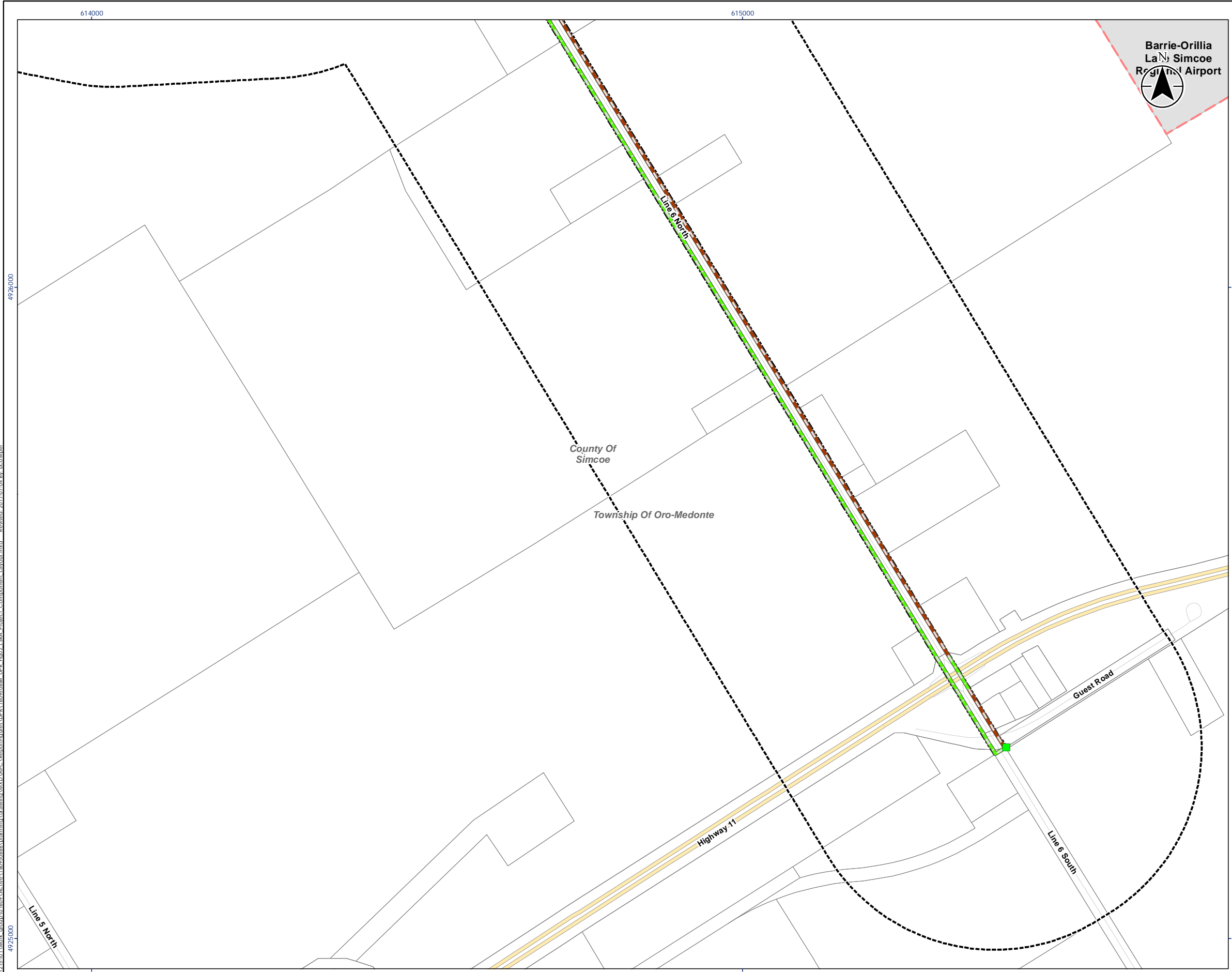
Project Component Layout



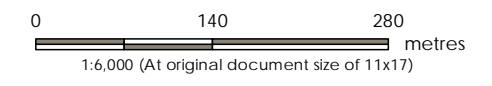
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 Revised: 2017-07-04 By: bcooper



- Legend**
- Project Location
 - Connection Point (CP)
 - 300m from the Project Location Boundary
 - Airport Lands
 - Expressway / Highway
 - Minor Road
 - Property Boundary
 - Overhead Electrical Line Option to CP
 - Underground Electrical Line Option to CP



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 17N
 2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © Queen's Printer for Ontario, 2017.



Project Location: Township of Oro-Medonte and County of Simcoe, ON
 Prepared by: BCC on 2017-07-04
 Technical Review by: ## on 2017-##-##
 Independent Review by: ## on 2017-##-##

Client/Project: LSRA SOLAR ENERGY PARTNERSHIP
 LSRA SOLAR PROJECT REA
 DECOMMISSIONING PLAN REPORT

Figure No.: 2.2

Title: Project Component Layout

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