

1. INTRODUCTION

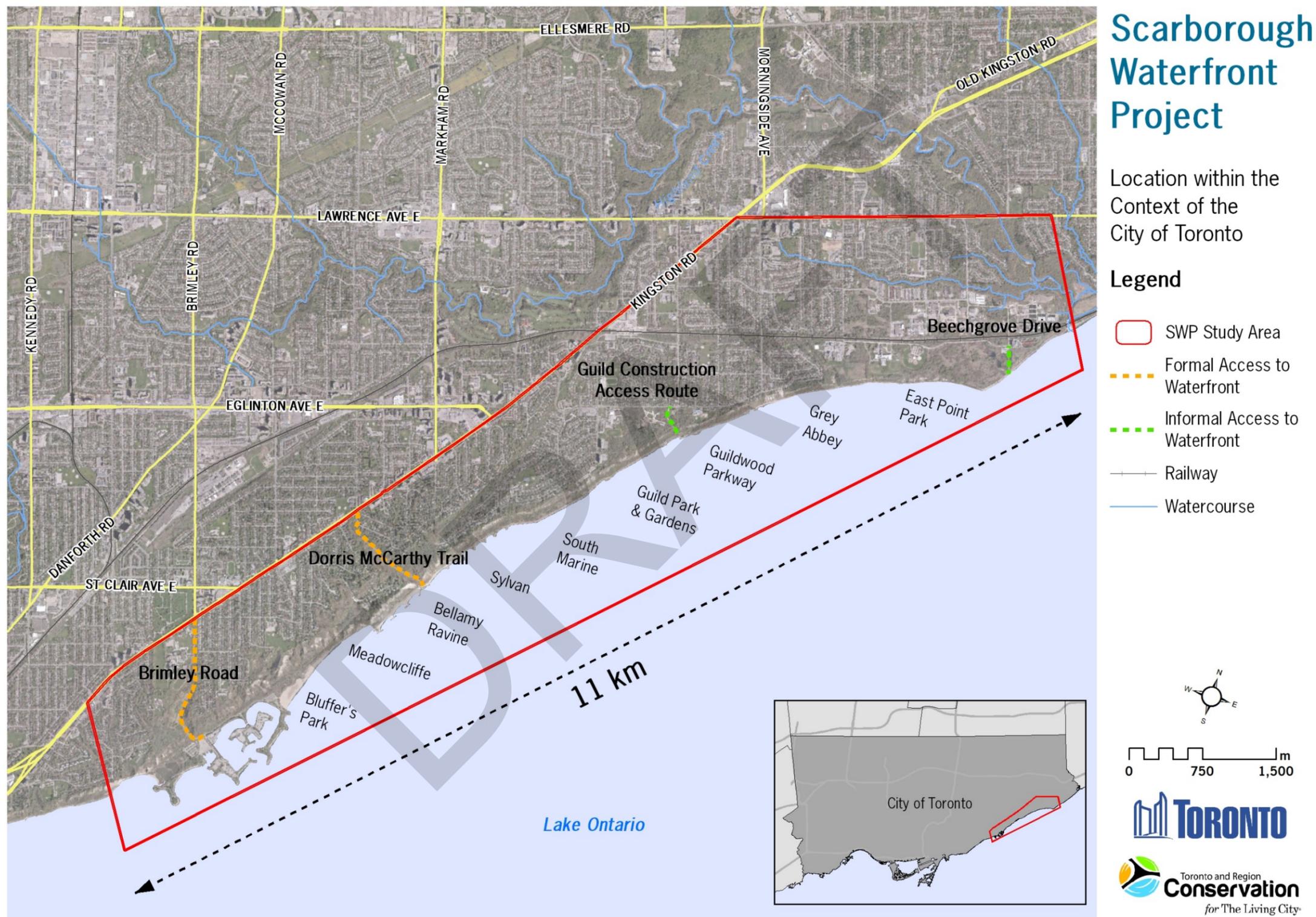
Toronto and Region Conservation Authority (TRCA), in partnership with the City of Toronto, is proceeding with an **Environmental Assessment (EA)**¹ for the Scarborough Waterfront Project (SWP), from Bluffer's Park east to East Point Park in the City of Toronto (**Figure 1-1**). This section of the Scarborough **waterfront** has been the subject of many studies seeking to understand stressors on the **ecosystem**, public access issues, and the nature of public safety and property risks posed by shoreline erosion. While the Scarborough **Bluffs** are an iconic feature of the Lake Ontario shoreline, due to limited public access and existing public safety hazards, the **water's edge** along this section of the waterfront (or shoreline)² is not formally accessible to the public. Ultimately, the SWP has the potential to provide formal public access along a currently inaccessible area of the Scarborough waterfront between Bluffer's Park and East Point Park, while comprehensively addressing the risks to public safety and public property and enhancing the **natural heritage system**.

The City of Toronto's Official Plan and TRCA's The Living City Policies are guiding planning documents for the SWP, which recognize the need to balance waterfront revitalization and public access with natural heritage and natural hazard protection and management. There is no formal public access along the shoreline between Bluffer's Park and East Point Park (approximately 11 km), as a result of the steep grades, public safety risks due ongoing shoreline erosion and **crest migration**, private property, and restricted access associated with critical public infrastructure. TRCA's The Living City Policies and the City of Toronto's Official Plan recognize that public ownership of waterfront lands is a key means to managing natural hazards, while providing accessible open space integrated with opportunities for public enjoyment, and aquatic and terrestrial enhancements. The Official Plan lays out a framework for the City of Toronto in which *"a connected greenspace system links our parks and open spaces, and identifies that over time, lands on the water's edge should become a network of publicly accessible open spaces, offering a range of leisure activities connected by a continuous waterfront trail (Section 3.4, Policy 1.e)"*. TRCA's The Living City Policies further supports this framework, and lays out a strategic direction for *"preventing, eliminating, or reducing the risk of flood and erosion hazards to life and property and promoting an integrated approach to revitalization of the waterfront (Section 7.2.4, Policy a)"* through *"increased public access, recreational opportunities, and continuous trail system (Section 7.2.4, Policy b)"*; while enhancing the terrestrial and aquatic natural habitats of the **shoreline**.

¹ All words bolded and italicized throughout the document are defined in the glossary.

² Note that the terms "waterfront" and "shoreline" are used interchangeably in this report and include both the **top and toe of the Bluff**. The term "water's edge" refers to the area along the toe of the bluff only.

Figure 1-1 Project location within the context of the City of Toronto.



The SWP supports and advances the City of Toronto policies laid out in the Official Plan and TRCA's The Living City Policies by addressing the existing risk to public safety and public infrastructure due to erosion along the shoreline, and providing for increased public space while improving and enhancing the natural heritage system.

The SWP is subject to the requirements of the Ontario **Environmental Assessment Act (EA Act)** as an Individual Environmental Assessment (EA). This document is the draft **EA Report** and was completed in accordance with the **Terms of Reference (ToR)** approved December 15, 2015 (**Appendix A**) and in accordance with the "Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario" (MOECC, 2014). Following completion of the draft public review (from August 17, 2017 to October 2, 2017 this report will be finalized and submitted to the Ministry of Environment and Climate Change (MOECC) for review and an approval decision.

1.1 Project Background

There is a long history of progressive and evolutionary planning for the Toronto Waterfront. The "Waterfront Plan for the Metropolitan Toronto Planning Area" (1967) introduced a shoreline management approach to limit shoreline erosion while creating a number of large parkland areas and public marinas connected by a waterfront trail system. In 1970, TRCA was designated by the Province as the lead implementing agency for the Etobicoke to Ajax shoreline, with the exception of the central harbour sector, and led the creation of waterfront plans and programs based on an integrated shoreline management approach. In 1992, the Royal Commission on the Future of the Toronto Waterfront (Royal Commission) released its final report entitled "Regeneration: Toronto Waterfront and the Sustainable City," which outlined the lack of a coordinated, ecosystem approach to shoreline regeneration. The Royal Commission recommended that a shoreline regeneration plan be prepared to protect and regenerate the Lake Ontario shoreline from the City of Burlington in the west to the community of Newcastle in the east.

To implement this recommendation, the Ontario Government established the Waterfront Regeneration Trust (WRT) in June of 1992. To fulfill its mandate, the WRT initiated the creation of a Shoreline Management Strategy for the Lake Ontario shoreline from Burlington Bay to the Trent River. The Shoreline Management Strategy became a component of the overall "Lake Ontario Greenway Strategy" released by the WRT in May 1995.

The "Lake Ontario Greenway Strategy" (1995) recommended that Integrated Shoreline Management Plans (ISMPs) be developed to provide a framework for future development and management of the Lake Ontario shoreline. Based on the traditional shoreline hazard management activities undertaken by Conservation Authorities, ISMPs

were intended to be more comprehensive in their scope, providing a coordinated **ecosystem-based approach**, addressing the need to limit high rates of erosion, while enabling safe public access, and the creation of regional scale parkland and waterfront recreation opportunities.

The SWP is being planned using a rational comprehensive planning approach to resolve the access, safety, and habitat integrity issues between Bluffer's Park and East Point Park in an integrated manner such that the needs of the ecosystem and the residents of the City of Toronto are met. Planning of this Project builds on past planning efforts, but is informed by the latest understanding of scientific approaches to coastal engineering, ecosystem management, and park and trail planning.

1.2 Project Vision and Objectives

The development of the **Project Vision and Objectives** draws from the strategic direction provided by the Official Plan, TRCA policies, the ISMP and other guiding initiatives and documents, as described in **Chapter 2** of this EA Report. In addition, consultation specifically focused on the Project Vision and Objectives was undertaken as part of the development of the ToR, and feedback helped refine them. The Vision and Objectives have been used to describe the Project and structure the development and evaluation of Alternatives.

The Project Vision is a high-level, guiding purpose of the Project. The Project Objectives describe what the Project is ultimately trying to achieve if implemented.

Arising from stakeholder input received through the ToR, the Project Vision is to *create a system of **greenspaces** along the Lake Ontario shoreline which respect and protect the significant natural and cultural features of the Bluffs, enhance the terrestrial and aquatic **habitat**, and provide a safe and enjoyable waterfront experience.*

The Project Objectives are to:

- **Protect and enhance terrestrial and aquatic natural features and linkages**
Habitat type, health, and sensitivity vary in the Project Study Area. While much of the Project Area lacks aquatic **habitat integrity**, there exists potential to add to the quality of this habitat. There are opportunities to enhance and incorporate aquatic habitat within existing and proposed shoreline works. Further, increased public use of the area, including informal access trails, has affected the terrestrial ecology through **habitat fragmentation** and impact on sensitive communities. There is the potential to improve the ecology through the better management of public access. As the population in south Scarborough grows through denser development, these pressures and effects will increase. This objective is consistent with broader objectives articulated in other studies such as: The Lake

Ontario Fish Community Objectives, Toronto Waterfront Aquatic Habitat Restoration Strategy, and the City of Toronto Official Plan.

- **Manage public safety and property risk**

Erosion risks within the Project Area include both *geotechnical* components (crest migration) and coastal components (shoreline erosion). Previous TRCA initiatives along the shoreline have addressed specific areas at high risk due to erosion by providing shoreline protection. However, a comprehensive solution to managing public safety, access, and public property risk has not previously been sought. The SWP is an opportunity to mitigate remaining public safety risks as they relate to access to/from and along the shoreline, and provide formal public access. Risk to public property includes public infrastructure (such as roads), and public park space located at the top of the Bluffs, which are vulnerable to ongoing shoreline erosion and crest migration. This objective is consistent with broader objectives articulated in other studies such as the City of Toronto Official Plan and TRCA's The Living City Policies.

- **Provide an enjoyable waterfront experience**

A number of factors contribute to an enjoyable waterfront experience. For example, diversity of experience, views and vistas, multi-use trail connections, and education/appreciation of the natural and cultural features of the Bluffs. The Project provides the opportunity to build on existing greenspace areas, including Bluffer's Park and East Point Park. A trail along the waterfront to connect existing greenspaces is recognized as a long term objective within a number of planning initiatives, including the Official Plan and the TRCA's The Living City Policies. Population growth and changing patterns of recreational use will create increasing pressure for access to, and along the waterfront. Planning and development of a comprehensive park and trail system to meet these recreational demands will work to relieve pressures on sensitive ecological areas and local communities, while managing informal access and use.

- **Consistency and coordination with other initiatives**

Significant community planning has occurred in this area. The Project will be consistent with, and coordinated with, other initiatives, including the Lake Ontario Greenway Strategy, Urban Recreational Fisheries Strategy, Guild Park and Gardens Management Plan, the proposed expansion of the rail corridor by Metrolinx, existing land uses, and other local community initiatives. If possible, the Project needs to build on and complement these other initiatives. Furthermore, the Project needs to be sensitive to community concerns (i.e., construction traffic) and not create new or unnecessary impacts. As an example, there is the potential for increased vehicle traffic to be attracted to the local area

as a result of new greenspace and trail development. The potential for such impacts on the community needs to be considered and managed. This Objective also seeks to integrate the Project with other parallel planning processes and other projects that may be ongoing adjacent to the Project Area.

- **Achieve value for cost**

It is desirable to maximize the benefits achieved through the Project in relation to the estimated Project cost (capital and operations and maintenance costs). The lowest cost Alternative is not necessarily preferred but there must be commensurate value for the investment to be made by TRCA and City of Toronto, and potentially other funding partners.

1.3 Proponent

TRCA is the **proponent** of the SWP and will have responsibility for ensuring that the design, construction, and management of the SWP is pursuant to this EA and other environmental approvals. As per the 1972 Waterfront Agreement, it is expected that the City of Toronto will be the responsible agency for the operations and maintenance of the future greenspace, including the operations and maintenance monitoring activities, as per the City of Toronto Parks Standards and Parks Plan. TRCA will continue to be the responsible agency for monitoring and maintenance of the shoreline protection.

TRCA was formed in the aftermath of Hurricane Hazel and has a strong history in **watershed** management and leadership in applying sustainability practices. In 2003, TRCA's Board endorsed the vision for The Living City, which is firmly based on the four pillars of TRCA's ongoing commitment to healthy rivers and shorelines, greenspace and **biodiversity**, sustainable communities, and business excellence. TRCA's recently released 10-year Strategic Plan (2013-2022) reconfirms the vision for The Living City, and recognizes that large and interconnected greenspaces offer a wide range of **active and passive recreational opportunities**, while safeguarding their natural environmental functions and providing suitable habitats for plant and animal species.

More information on TRCA is provided in the ToR or via the following link:
www.trca.ca.

1.4 EA Framework

The EA for the SWP was completed in two stages as required by the *EA Act*. Stage one included the completion and approval of a ToR. The purpose of the ToR was to describe how the EA should be carried out and to provide the public, agencies and Aboriginal communities with an opportunity to comment prior to proceeding with the study. TRCA completed the ToR and it was approved by the MOECC on December 15,

2015. Stage two of the Project included the completion of the EA and preparation of the EA Report (this report) in accordance with the approved ToR. A copy of the Approved ToR can be found in **Appendix A**.

As described in Section 3 of the ToR, the EA was completed using a “***focused***” ***approach*** in accordance with subsections 6(2)(c) and 6.1(3) of the *EA Act* and in accordance with the “Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario” (MOECC, 2014). This EA is “focused” in that the consideration of “***Alternatives To***” has been satisfied through previous studies, as detailed in Chapter 2. In all other ways, this EA reflects the comprehensive study of Alternatives and their impact on the environment.

Draft EA Report

This draft EA Report has been submitted for review to the MOECC and contains the following:

- A description of and statement of the rationale for the ***undertaking*** as well as the ***Alternative Methods*** of carrying out the undertaking;
- A description of:
 - the ***environment*** that will be affected or that might reasonably be expected to be affected, directly or indirectly, by the undertaking and the Alternative Methods of carrying out the undertaking;
 - the ***effects*** that will be caused or that might reasonably be expected to be caused to the environment, by the undertaking and the Alternative Methods of carrying out the undertaking; and
 - the actions necessary or that may reasonably be expected to be necessary to prevent, change, mitigate or remedy the effects upon or the effects that might reasonably be expected upon the environment, by the undertaking and the Alternative Methods of carrying out the undertaking;
- An evaluation of the advantages and disadvantages to the environment of the undertaking and the Alternative Methods of carrying out the undertaking; and,
- A description of any consultation about the Project undertaken by the proponent and the results of the consultation.

The EA Report follows a traceable decision-making process and includes the following:

- An Executive Summary that summarizes the EA as well as a list of studies and reports, and a well-marked legible map of the location of the undertaking and the Project Study Area;
- A discussion of the purpose of the undertaking;
- A table that summarizes all commitments made in the ToR and that identifies which sections of the EA Report satisfy each commitment (**Table 1-1**);

- An overview of preliminary costs, funding, phasing and timing of the Project (as available);
- A discussion of **net effects** (those that remain following mitigation) and a summary of the evaluation of the advantages and disadvantages to the environment of the proposed undertaking and the alternative methods based on net effects;
- The consideration of climate change, cumulative effects and source water protection areas; and,
- A discussion on the rationale for the identification of the Alternative Methods that were evaluated.

Table 1-1 provides information on where each of the commitments in the ToR are addressed in the EA Report.

Table 1-1 Concordance with Commitments Made in the ToR.

Commitment Made in ToR	Where Commitment is Addressed in the EA Report
The Project will identify areas to minimize risk to public safety and public property, while integrating new public access, recreational opportunities and benefits to natural habitat along the Scarborough Bluffs. Section 2, page 4 of the ToR.	Section 5.3
TRCA has decided that it will complete a “focused” EA in accordance with subsections 6(2)(c) and 6.1(3) of the <i>EA Act</i> . Section 3, page 10 and Section 3.1 page 11 of the ToR.	Chapter 4
The public, agencies, interest groups, and landowners have been consulted through the development of the ToR and will continue to be consulted during the preparation of the EA, as per the consultation plan provided in Section 10 of this ToR. Section 3.1, page 10 of the ToR.	Chapter 10
The EA Report will document the decision-making approach used to determine the Preferred Alternative for the Project, and to minimize potential adverse Project related effects as well as to address any Stakeholder concerns related to the proposed work. Section 3.1, page 10 of the ToR.	Chapter 5 and Section 6.1

Commitment Made in ToR	Where Commitment is Addressed in the EA Report
<p>The EA will examine the “Do Nothing” Alternative and “Alternative Methods” (i.e., alternative ways of carrying out the Project).</p> <p>Section 3.1, page 12 of the ToR.</p>	Chapter 5
<p>A draft EA Report will be prepared and made available for public, agency, and First Nation and Métis review.</p> <p>Section 3.1, page 13 of the ToR.</p>	Section 1.6
<p>TRCA will provide a final list of potential permits and approvals as part of the EA Report.</p> <p>Section 3.3, page 13 of the ToR.</p>	Section 1.5
<p>The description and rationale for the Project (the “Undertaking”) will be further refined as part of the EA process. The description and rationale for the Project will be based on the study Vision and Objectives, recommendations from other guiding plans and initiatives described in Section 2 of this ToR, and will reflect the advantages and disadvantages of the Preferred Alternative once the evaluation is completed in the EA.</p> <p>Section 4, page 16 of the ToR.</p>	Chapters 2, 6, 7 and 11
<p>All Alternatives must meet the Project Vision and Objectives, and will be evaluated based on how well each Alternative meets the Vision and Objectives.</p> <p>Section 4.1, page 16 of the ToR.</p>	Section 5.4
<p>The Problems and Opportunities will be further defined by Shoreline Segment in the EA, and will provide the foundation for the development of Alternatives for each Shoreline Segment.</p> <p>Section 4.3, page 20 of the ToR.</p>	Section 2.5 and Section 5.2
<p>Final temporal boundaries will be provided in the EA.</p> <p>Section 4.4, page 22 of the ToR.</p>	Section 2.4
<p>Once identified, the Preferred Alternative (the Project) will be compared against the “Do Nothing” Alternative to confirm the recommended undertaking.</p> <p>Section 5.1, page 23 of the ToR.</p>	Chapter 11

Commitment Made in ToR	Where Commitment is Addressed in the EA Report
<p>A description of existing conditions in the Project Study Area will be prepared which will provide contextual information for the formation of the Alternatives and their evaluation.</p> <p>Section 6.1, page 24 of the ToR.</p>	Chapter 3
<p>For each Shoreline Segment that has available Alternatives, these Alternatives will be assessed on the basis of the evaluation criteria and indicators.</p> <p>Section 6.1, page 25 of the ToR.</p>	Section 5.4
<p>The Draft Evaluation Criteria will be refined during the course of the EA and may include additions or deletions based on new information that is obtained by the Project Team, including Stakeholder input.</p> <p>Section 6.1, page 25 of the ToR.</p>	Table 5-2
<p>This assessment will result in a final discussion of how the Preferred Alternative meets the Project Objectives, a summary of environmental effects and mitigation measures, and an assessment of Project advantages and disadvantages as compared to the “Do Nothing” Alternative (i.e., not proceeding with the Project).</p> <p>Section 6.1, page 26 of the ToR.</p>	Chapters 7 and 11
<p>Coastal analysis will be completed during the EA.</p> <p>Section 7.1.5, page 29 of the ToR.</p>	Appendix C
<p>The EA will include a more detailed description of stormwater runoff and streamflow characteristics in the study area.</p> <p>Section 7.1.6, page 33 of the ToR.</p>	Section 3.1.5
<p>The EA will consider climate change in the development and evaluation of the Preferred Alternative.</p> <p>Section 7.1.8, page 34 of the ToR.</p>	Chapter 7
<p>The EA Report will provide a more detailed description of existing infrastructure, community services and recreation in the Project Study Area that could potentially be affected by the Project.</p> <p>Section 7.3.2, page 43 of the ToR.</p>	Section 3.3

Commitment Made in ToR	Where Commitment is Addressed in the EA Report
TRCA will consider First Nation and Métis interests during the Project planning and design phase, and will provide the results of the consultation program in the EA Report. Section 7.3.4, page 46 of the ToR.	Section 3.3.5 Section 10.5
The EA Report will include a list of commitments to be fulfilled by TRCA following EA approval. Section 9, page 51 of the ToR.	Section 8.1.2
A monitoring plan will be developed and included in the EA Report. Section 9.2, page 51 of the ToR.	Section 8.1

Canadian Environmental Assessment Act (CEAA), 2012

CEAA, 2012 does not apply to this Project as the scope of work is not included on the Canadian Environmental Assessment Agency's Regulations Designating Physical Activities List, which identifies the types of projects that may require a federal EA.

Although *CEAA, 2012* does not apply to this Project, the Project may still require federal permits and/or approvals as outlined below.

1.5 Other Approvals

The Project may require municipal, provincial and federal permits and approvals prior to construction. **Table 1-2** provides a list of potential permits and approvals.

Table 1-2 Potential Permits and Approvals.

Agency	Potential Permit or Approval
Federal	
Environment Canada	<ul style="list-style-type: none"> ▪ A permit may be required under the <i>Species at Risk Act, 2002</i>, should the Project affect species at risk or their habitat. ▪ A permit would be required under the <i>Migratory Birds Convention Act, 1994</i>, should the Project affect migratory birds or bird habitat listed in the <i>Act</i>.

Agency	Potential Permit or Approval
Fisheries & Oceans Canada (DFO)	<ul style="list-style-type: none"> ▪ An authorization from DFO would be required under the <i>Fisheries Act, 1985</i> (amended 2013), if it is determined that removal of aquatic habitat is deemed a “serious harm to fish” under the new Fisheries Act Regulation, if the effects cannot be avoided or mitigated as part of the design. ▪ DFO administers the SAR for aquatic species. A permit may be required.
Transport Canada	<ul style="list-style-type: none"> ▪ Transport Canada will need to be notified of any work, such as new trails or other pathways that cross federally-regulated rail lines as per the <i>Railway Safety Act, 1985</i>. ▪ Any in-water works and/or shoreline alteration could require authorization under the <i>Navigation Protection Act</i> (amended 2014) and applicable regulations under this legislation (e.g., Navigable Waters Works Regulation).
Provincial	
Ministry of Environment and Climate Change	<ul style="list-style-type: none"> ▪ Filing of the dewatering rates and duration in the Environmental Activity and Sector Registry (EASR) or Permit to Take Water (PTTW) in compliance with Ontario Regulation 387/04 (as amended) and the Ontario Water Resources Act. A water-taking EASR is required for construction projects that involve between 50,000 and 400,000 litres of water per day under normal conditions. A PTTW is required if the taking is greater than 400,000 litres per day under normal conditions.
Ministry of Natural Resources and Forestry	<ul style="list-style-type: none"> ▪ The bed of Lake Ontario along some areas of the shoreline in the Study Area is owned by the Crown. Approval will be required for placement of fill in these areas. A work permit may be required from the Ministry if the Project requires the disposition (i.e., release) of Crown land, such as the Lake Ontario lakebed, under the <i>Public Lands Act, 1990</i>. ▪ Permits may be required for any works within areas identified as habitat of a SARO, under the Endangered Species Act. As SARO have been identified in the Study Area, a Section 17 permit may be required for the protection and recovery of a provincial Species at Risk. An authorization may be required under the <i>Fish and Wildlife Conservation Act, 1997</i>, if the Project affects specially protected wildlife in the Project Study Area.

Agency	Potential Permit or Approval
Ministry of Tourism, Culture and Sport	<ul style="list-style-type: none"> ▪ The Project will require archaeological clearance under the <i>Ontario Heritage Act, 1990</i>, as part of the regulatory process to ensure effects to features of cultural interest are minimized.
Toronto and Region Conservation Authority	<ul style="list-style-type: none"> ▪ Must be compliant with the requirements of the CA Act and Regulations 160/06 and 166/06 for alterations to the shoreline.
Municipal	
City of Toronto	<ul style="list-style-type: none"> ▪ Efforts to provide safe pedestrian and cycling access to the shoreline, and improve habitat at East Point Park through the formalization of a primary or high-capacity multi-use trail and may require approvals from Urban Forestry under the Ravine and Natural Feature bylaw, which also considers works in the ESA. ▪ Toronto Water permits for potential extension of outfalls. ▪ Potential for access agreements for temporary implementation access and staging areas at City management areas. ▪ Potential for easements with Toronto Water for access across the FJ Horgan WTP site.

1.6 Public and Agency Review of the Draft EA Report

This draft EA Report was made available for public, agency and Aboriginal review for a 45-day review period commencing August 17, 2017 and ending October 2, 2017. The draft EA Report was made available electronically on the Project website: trca.ca/swp, as well as in hard-copy at eight (8) of locations. Additional details of this review are provided in **Chapter 10**.

1.7 Overview of EA Report

The Draft EA Report is organized into the following chapters:

Chapter 1: Introduction

This chapter provides a brief description of the proponent, background information, the Project vision and objectives, a summary of the regulatory framework for the EA, an overview of the public release of the draft EA Report, and concordance with the approved ToR.

Chapter 2: Purpose of the Undertaking

This chapter provides the planning context for the Project, problem/opportunity assessment, Project Study Area, and temporal boundaries.

Chapter 3: Description of the Potentially Affected Environment

This chapter describes the physical, natural and socio-economic **baseline conditions** in the area.

Chapter 4: Description, Evaluation and Rationale for “Alternative To”

This chapter provides a summary of the evaluation of the “Do Nothing” alternative.

Chapter 5: Description, Evaluation and Rationale for “Alternative Methods”

This chapter describes the evaluation undertaken to select the Preferred Alternative for the Project. The Preferred Alternative is the option selected that is most likely to meet the Project Vision and Objectives.

Chapter 6: Description of the Preferred Alternative

This chapter provides a description of the Preferred Alternative selected for the Project including the shoreline configuration, safety, naturalization, recreation, operations and maintenance, construction activities and access, construction phasing and funding.

Chapter 7: Potential Effects, Effects Assessment and Mitigation Measures for the Preferred Alternative

This chapter presents the detailed assessment of the Preferred Alternative including potential effects, **mitigation measures** and net effects. This chapter includes the assessment of cumulative effects.

Chapter 8: Monitoring and Adaptive Environmental Management

This chapter outlines the overall strategy and activities for baseline and EA compliance monitoring as well as adaptive management strategies and EA commitments.

Chapter 9: EA Amendment Process

This chapter describes the framework proposed to deal with any post-EA Project modifications.

Chapter 10: Consultation

This chapter describes the public, agency and Aboriginal consultation program undertaken during the EA including input received and responses provided.

Chapter 11: Advantages and Disadvantages

This chapter provides a summary of the Project's key advantage and disadvantages.

Chapter 12: References

This chapter provides the references and works cited in the EA Report.

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