CASE NO: OLT-22-004597

PROCEEDING COMMENCED UNDER Section 17(36) of the *Planning Act,* R.S.O. 1990, c. P.13.

Applicant/Appellant:	2606609 Ontario Inc.
Subject:	Request to amend the Official Plan – Refusal of the requested amendment
Property Address/Description:	2 River Street and 50 Orchard Street
Municipality:	Kingston, Frontenac County
Municipal File No.:	D35-009-2017
OLT Case No.:	OLT-22-004597
OLT File No.:	OLT-22-004597
OLT Case Name:	2606609 Ontario Inc. v. Kingston (City)

PROCEEDING COMMENCED UNDER Section 34(11) of the *Planning Act,* R.S.O. 1990, c. P.13.

Applicant/Appellant:	2606609 Ontario Inc.
Subject:	Application to amend the Zoning By-law – Refusal of the requested amendment
Property Address/Description:	2 River Street and 50 Orchard Street
Municipality:	Kingston, Frontenac County
Municipal File No.:	D35-009-2017
OLT Case No.:	OLT-22-004597
OLT File No.:	OLT-22-004597
OLT Case Name:	2606609 Ontario Inc. v. Kingston (City)

COMPENDIUM OF SELECTED EXHIBIT EXCERPTS REFERRED TO IN WRITTEN SUBMISSIONS OF NO CLEARCUTS KINGSTON

CANADIAN ENVIRONMENTAL LAW ASSOCIATION
55 University Ave, 15th Floor
Toronto, ON M5J 2H7

Joseph F. Castrilli
Tel: 416-960-2284, Ext. 7218
castrillij@sympatico.ca

Richard D. Lindgren
Tel: 416-960-2284, Ext. 7214
r.lindgren@sympatico.ca

Lawyers for No Clearcuts Kingston

TO:

ONTARIO LAND TRIBUNAL
655 Bay Street, Suite 1500
Toronto, ON M5G 1E5

AND TO:

Attn: **Ben Bath** ben.bath@ontario.ca

DENTONS CANADA LLP
Barristers & Solicitors
99 Bank Street Suite 1420
Ottawa, ON K1P 1H4

Roberto D. Aburto
Tel: 613-786-8679
roberto.aburto@gowlingwlg.com

Alice M. Mihailescu
Tel: 613-288-2715
alice.mihailescu@dentons.com

GOWLING WLG (CANADA) LLP
Barristers & Solicitors
Suite 2600
160 Elgin Street
Ottawa, ON K1P 1C3

Tel: 613-233-1781
Fax: 613-563-9869

Jennifer L. King
Tel: 416-862-5778
jennifer.king@gowlingwlg.com

Jessica R. Chen
Tel: 416-862-4457
jessica.chen@gowlingwlg.com

Lawyers for 2606609 Ontario Inc.

CUNNINGHAM, SWAN, CARTY, LITTLE & BONHAM LLP

Anthony E. Fleming
Tel: 613-544-0211 ext. 8096
tfleming@cswan.com

Spencer S. Putnam
Tel: 613-546-8098
sputnam@cswan.com

Lawyers for the City of Kingston

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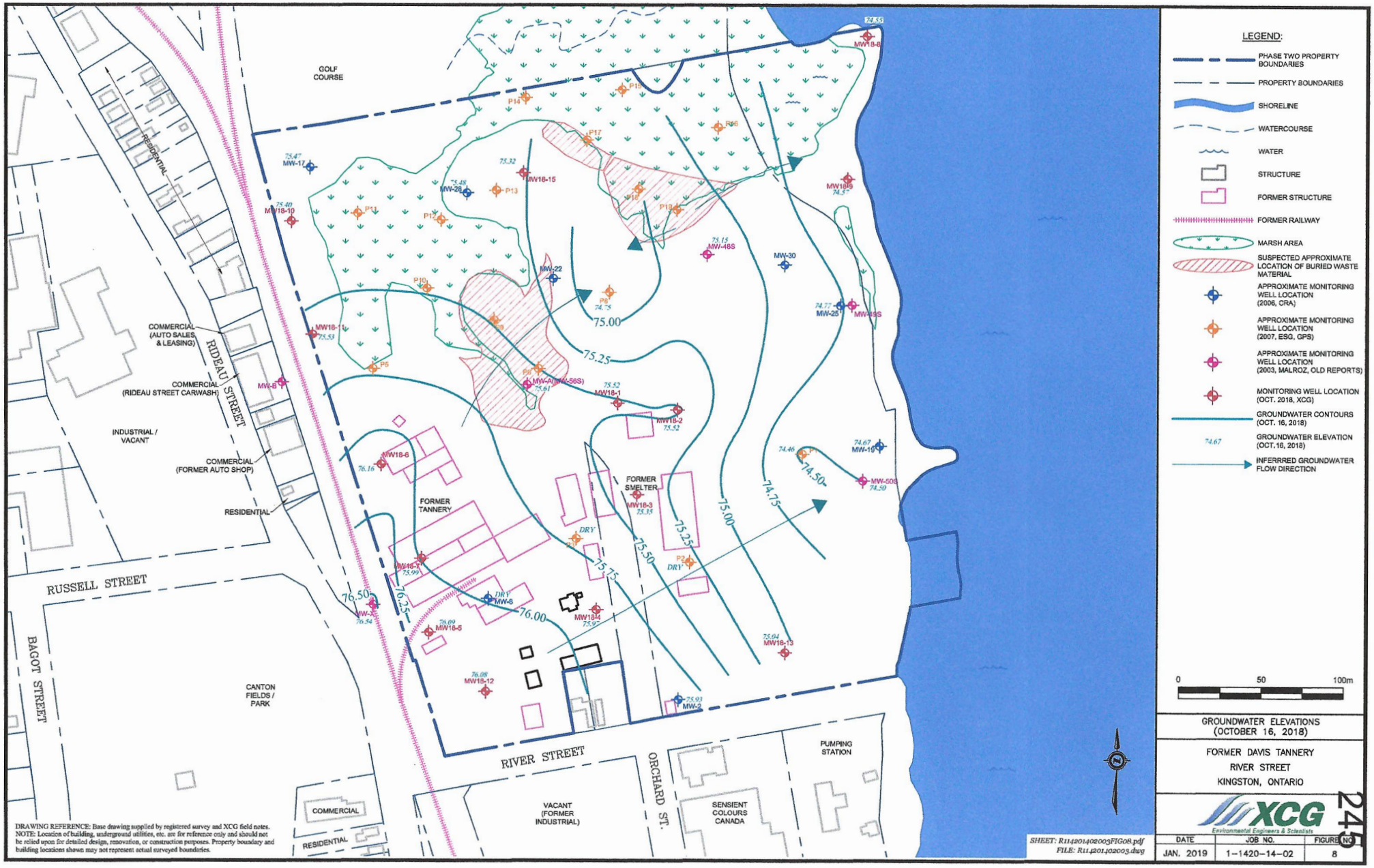


DRAWING REFERENCE: Base drawing supplied by registered survey and XCG field notes.
NOTE: Location of building, underground utilities, etc. are for reference only and should not be relied upon for detailed design, renovation, or construction purposes. Property boundary and building locations shown may not represent actual surveyed boundaries.

SHEET: R1142014020003FIG08.pdf
FILE: R1142014020003.dwg

GROUNDWATER ELEVATIONS (OCTOBER 16, 2018)

FORMER DAVIS TANNERY
RIVER STREET
KINGSTON, ONTARIO

XCG
Environmental Engineers & Scientists

DATE	JOB NO.	FIGURE NO.
JAN. 2019	1-1420-14-02	8

24-9

2314

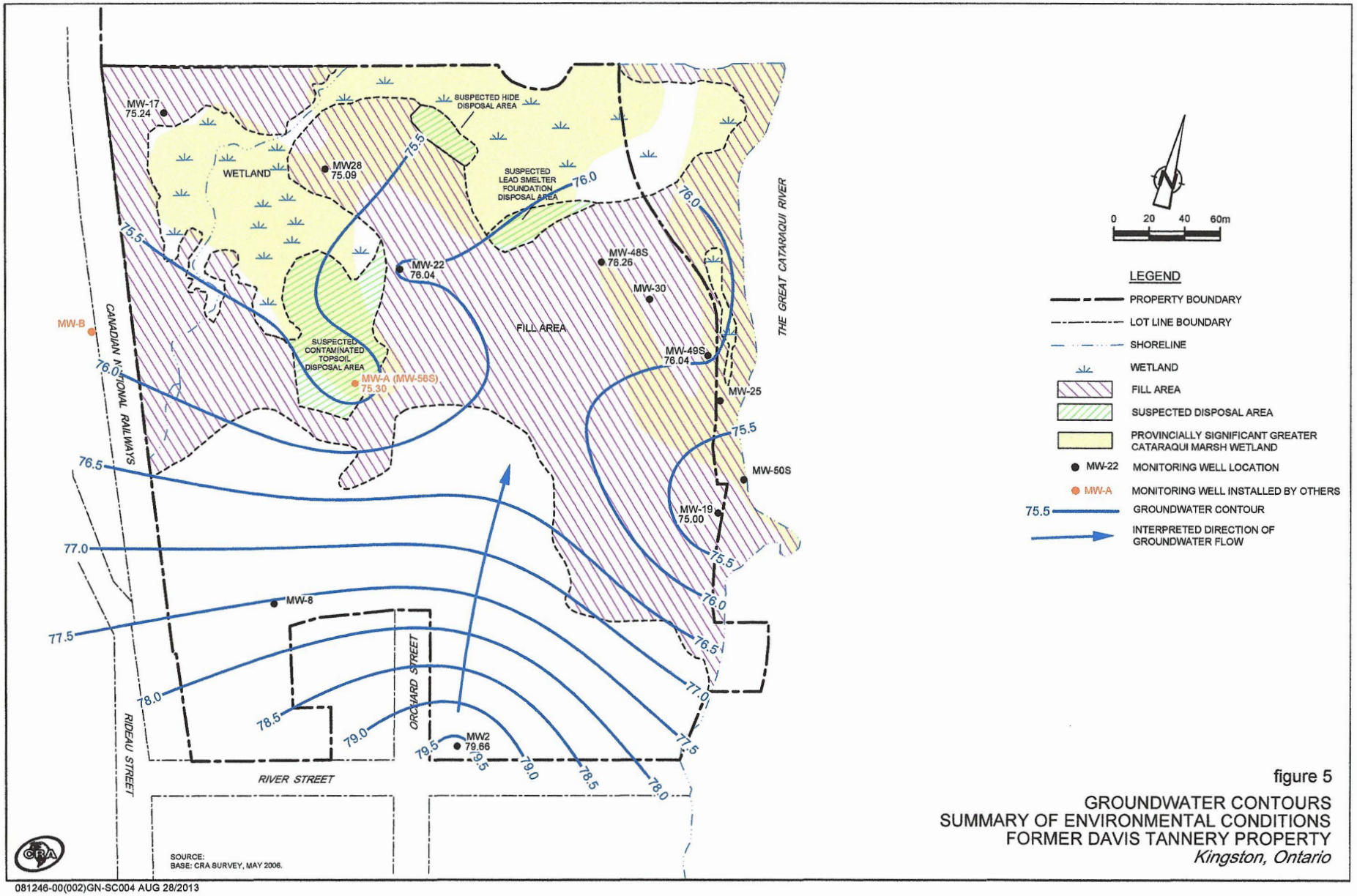


figure 5

GROUNDWATER CONTOURS
SUMMARY OF ENVIRONMENTAL CONDITIONS
FORMER DAVIS TANNERY PROPERTY
Kingston, Ontario

081246-00(002)GN-SC004 AUG 28/2013

Table 4 Summary of Groundwater Depths and Elevations

Monitoring Well ID	Ground Surface Elevation (masl)	Top of Pipe Elevation (masl)	Groundwater Depth (mbtop)	Groundwater Depth (mbgs)	Groundwater Elevation (masl)	Groundwater Depth (mbtop)	Groundwater Depth (mbgs)	Groundwater Elevation (masl)	Groundwater Depth (mbtop)	Groundwater Depth (mbgs)	Groundwater Elevation (masl)	Groundwater Depth (mbtop)	Groundwater Depth (mbgs)	Groundwater Elevation (masl)	Groundwater Depth (mbtop)	Groundwater Depth (mbgs)	Groundwater Elevation (masl)
			2-May-2006			17-Aug-06			31-Oct-06			25-Mar-13			16-Oct-18		
P-1	77.27	78.11	-	-	-	-	-	-	-	-	-	-	-	-	3.65	2.81	74.46
P-2	78.96	79.58	-	-	-	-	-	-	-	-	-	-	-	-	DRY	-	-
P-3	80.18	80.94	-	-	-	-	-	-	-	-	-	-	-	-	DRY	-	-
P-5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-8	76.295	77.158	-	-	-	-	-	-	-	-	-	-	-	-	2.41	1.55	74.75
P-9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P-19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MW-2	80.39	81.34	3.84	2.89	77.50	4.960	4.01	76.38	2.620	1.67	78.72	1.70	0.75	79.64	5.41	4.46	75.93
MW-8	80.4	81.53	DRY	-	-	DRY	-	-	DRY	-	-	DRY	-	-	DRY	-	-
MW-17	76.54	77.29	2.21	1.46	75.08	2.20	1.45	75.09	2.10	1.35	75.19	2.14	1.39	75.15	1.82	1.07	75.47
MW-19	75.77	76.74	1.72	0.75	75.02	2	1.03	74.74	1.88	0.91	74.86	1.8	0.83	74.94	2.07	1.10	74.67
MW-22	-	77.11	1.94	-	75.17	1.71	-	75.40	1.90	-	75.21	1.07	-	76.04	-	-	-
MW-25	75.74	76.58	2.63	1.79	73.95	2.98	2.14	73.60	-	-	-	-	-	-	1.81	0.97	74.77
MW-28	76.07	77.15	2.42	1.34	74.73	2.72	1.64	74.43	DRY	-	-	2.07	0.99	75.08	1.67	0.59	75.48
MW-30	-	77.89	2.91	-	74.98	2.94	-	74.95	2.46	-	75.43	-	-	-	-	-	-
MW-48S (421-05)	76.96	77.78	-	-	-	-	-	-	2.47	1.65	75.31	2.63	1.81	75.15	2.63	1.81	75.15
MW-49S (421-06)	-	77.77	-	-	-	-	-	-	1.72	-	76.05	1.73	-	76.04	-	-	-
MW-50S (421-07)	75.84	75.81	-	-	-	-	-	-	-	-	-	-	-	-	1.31	1.34	74.50
MW-56S (421-13, MW-A)	76.76	77.76	-	-	-	-	-	-	2.13	1.13	75.63	1.07	0.07	76.69	2.15	1.15	75.61
MW-B	-	-	-	-	-	3.36	-	-	-	-	-	-	-	-	-	-	-
MW-X	77.62	78.52	-	-	-	-	-	-	-	-	-	-	-	-	1.98	1.08	76.54
MW18-1	79.53	80.49	-	-	-	-	-	-	-	-	-	-	-	-	4.97	4.01	75.52
MW18-2	79.39	80.35	-	-	-	-	-	-	-	-	-	-	-	-	4.83	3.87	75.52
MW18-3	80.35	81.11	-	-	-	-	-	-	-	-	-	-	-	-	5.76	5.00	75.35
MW18-4	81.28	82.12	-	-	-	-	-	-	-	-	-	-	-	-	6.15	5.31	75.97
MW18-5	79.05	79.95	-	-	-	-	-	-	-	-	-	-	-	-	3.86	2.96	76.09
MW18-6	76.39	77.29	-	-	-	-	-	-	-	-	-	-	-	-	1.13	0.23	76.16
MW18-7	78.39	79.25	-	-	-	-	-	-	-	-	-	-	-	-	3.26	2.40	75.99
MW18-8	75.51	76.23	-	-	-	-	-	-	-	-	-	-	-	-	1.68	0.96	74.55
MW18-9	75.29	76.3	-	-	-	-	-	-	-	-	-	-	-	-	1.73	0.72	74.57
MW18-10	79.17	80.14	-	-	-	-	-	-	-	-	-	-	-	-	4.74	3.77	75.40
MW18-11	78	78.86	-	-	-	-	-	-	-	-	-	-	-	-	3.33	2.47	75.53
MW18-12	80.74	81.64	-	-	-	-	-	-	-	-	-	-	-	-	5.56	4.66	76.08
MW18-13	79.3	80.15	-	-	-	-	-	-	-	-	-	-	-	-	5.11	4.26	75.04
MW18-14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MW18-15	75.63	76.54	-	-	-	-	-	-	-	-	-	-	-	-	1.22	0.31	75.32
min depth to water table			1.72			1.71			1.72			1.07			1.13		
max depth to water table			3.84			4.96			2.62			2.63			6.15		
			Data from Conestoga-Rovers & Associates, 2013, Summary of Environmental Conditions, Former Davis Tannery Property, Kingston, Ontario, Table 1			Data from Conestoga-Rovers & Associates, 2013, Summary of Environmental Conditions, Former Davis Tannery Property, Kingston, Ontario, Table 1			Data from Conestoga-Rovers & Associates, 2013, Summary of Environmental Conditions, Former Davis Tannery Property, Kingston, Ontario, Table 1			Data from Conestoga-Rovers & Associates, 2013, Summary of Environmental Conditions, Former Davis Tannery Property, Kingston, Ontario, Table 1					

Notes:
All elevations are in m asl

mbtop	Metres below top of pipe
masl	Metres above site datum
-	Not Measured/Not applicable (ie: well could not be located)

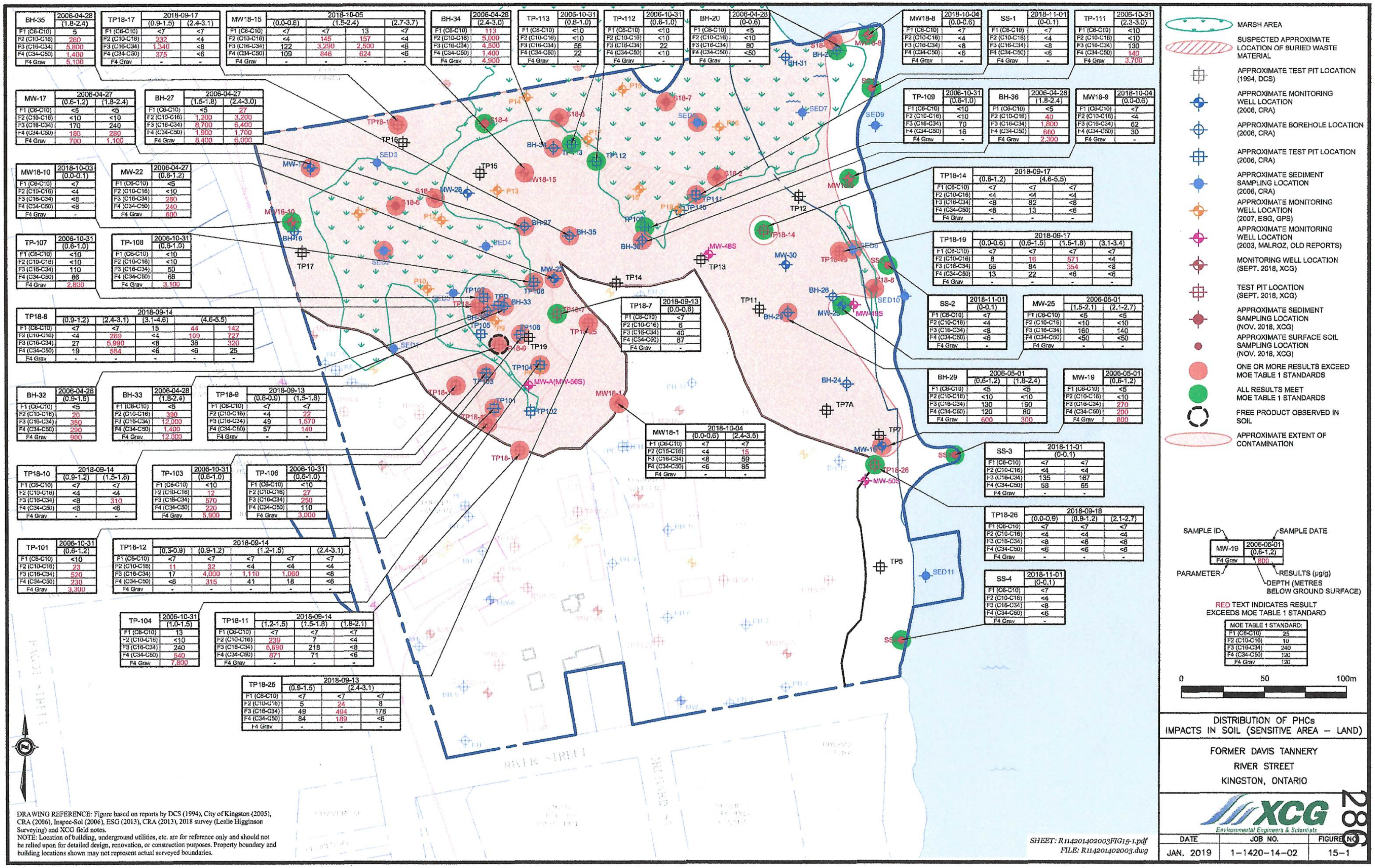
Table 2 Summary of Monitoring Well Construction Details

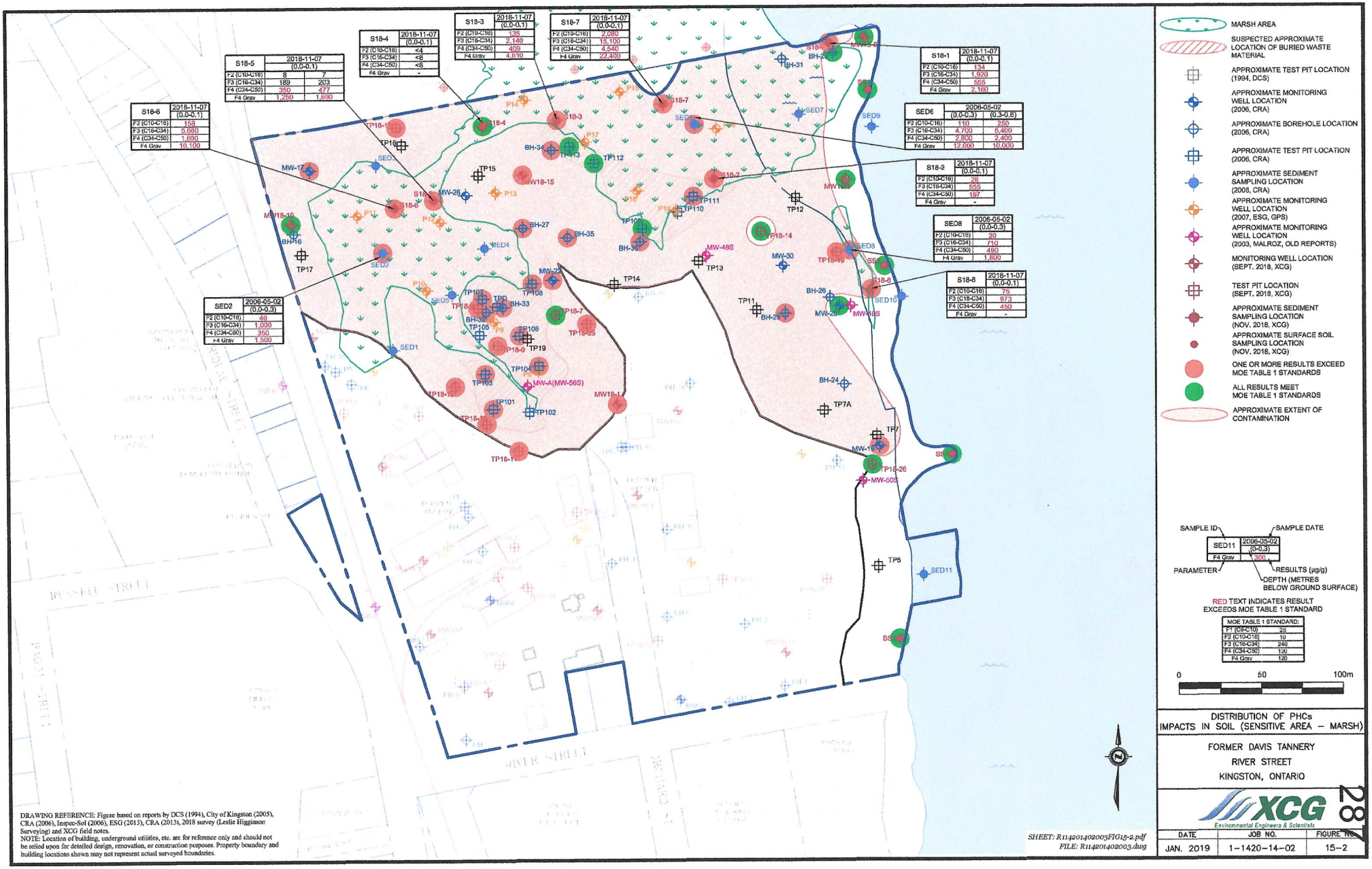
Monitoring Well ID	Installation Date	Depth to Bottom of Well (mbgs)	Sand Pack Interval (mbgs)	Screen Interval (mbgs)	Bentonite Interval (mbgs)	Ground Surface Elevation (masl)	Top of Pipe Elevation (masl)	Notes
ESG, 2007								
P1	30-Nov-2007	4.35	2.1 - 4.35	3.05 - 4.35	1.5 - 2.1	77.27	78.11	
P2	20-Nov-2007	2.25	0.9 - 2.25	1.2 - 2.25	0.6 - 0.9	78.96	79.58	
P3	19-Nov-2007	1.65	0.68 - 1.65	1.1 - 1.65	0 - .68	80.18	80.94	
P5	29-Nov-2007	4.2	2.4 - 4.2	2.9 - 3.3	1.8 - 2.4	-	-	Not located
P6	November 2007	3.5	1.5 - 2.2	2.2 - 3.5	0.85 - 1.5	-	-	Damaged
P8	November 2007	4.2	2.4 - 4.2	2.8 - 4.2	1.8 - 2.4	76.295	77.158	
P9	22-Nov-2007	4.2	2.9 - 4.2	3.2 - 4.2	2.4 - 2.9	-	-	Not located
P10	22-Nov-2007	4.8	2.8 - 4.8	3.5 - 4.8	1.8 - 2.8	-	-	Not located
P11	21-Nov-2007	4.15	1.8 - 4.15	3.7 - 4.15	1.2 - 1.8	-	-	Not located
P12	22-Nov-2007	4.8	3.0 - 4.8	3.4 - 4.8	2.4 - 3.0	-	-	Not located
P13	26-Nov-2007	4.8	3 - 4.8	3.4 - 4.8	2.4 - 3.0	-	-	Not located
P14	23-Nov-2007	4.5	2.7 - 4.5	3.0 - 4.5	1.95 - 2.7	-	-	Not located
P15	23-Nov-2007	4.8	2.7 - 4.8	3.4 - 4.6	1.8 - 2.7	-	-	Not located
P16	27-Nov-2007	4.8	2.4 - 4.8	3.4 - 4.8	1.8 - 2.4	-	-	Not located
P17	26-Nov-2007	4.5	2.4 - 4.5	3.1 - 4.5	1.8 - 2.4	-	-	Not located
P18	27-Nov-2007	4.8	3.0 - 4.8	3.4 - 4.8	2.4 - 3.0	-	-	Not located
P19	28-Nov-2007	3.9	1.8 - 3.9	2.5 - 3.9	0.9 - 1.8	-	-	Not located
CRA, 2006								
MW-2	26-Apr-2006	6.1	2.74 - 6.10	3.05 - 6.10	0 - 2.74	80.39	81.34	
MW-8	26-Apr-2006	1.83	0.61 - 1.83	0.91 - 1.83	0 - 0.61	80.4	81.53	
MW-17	27-Apr-2006	3.96	2.13 - 3.96	2.44 - 3.96	0 - 2.13	76.54	77.29	
MW-19	1-May-2006	3.35	1.52 - 3.35	1.83 - 3.35	0 - 1.83	75.77	76.74	
MW-22	27-Apr-2006	6.1	2.71 - 6.10	3.05 - 6.10	0 - 2.71	-	77.11	Not located
MW-25	1-May-2006	2.74	0.91 - 2.74	1.22 - 2.74	0 - 0.91	75.74	76.58	
MW-28	27-Apr-2006	6.1	2.74 - 6.10	3.05 - 6.10	0 - 2.74	76.07	77.15	
MW-30	28-Apr-2006	4.57	2.74 - 4.57	3.05 - 4.57	0 - 2.74	-	77.89	Not located
Malroz, 2003								
MW-48S (421-05)	2003	2.89	-	-	-	76.96	77.78	
MW-49S (421-06)	2003	-	-	-	-	-	77.77	Not located
MW-50S (421-07)	2003	-	-	-	-	75.84	75.81	Damaged
MW-56S (421-13, MW-A)	10-Jun-2003	3.05	1.2 - 3.05	1.5 - 3.05	0.3 - 1.2	76.76	77.76	
Unknown								
MW-B	-	-	-	-	-	-	-	Not located
MW-X	-	-	-	-	-	77.62	78.52	Unknown Well
XCG (2018)								
MW18-1	4-Oct-2018	4.57	2.44 - 4.57	2.59 - 4.57	0 - 2.44	79.53	80.49	
MW18-2	4-Oct-2018	5.79	2.44 - 5.79	2.74 - 5.79	0 - 2.44	79.39	80.35	
MW18-3	5-Oct-2018	7.62	2.13 - 9.45	4.57 - 7.62	0 - 2.13	80.35	81.11	
MW18-4	5-Oct-2018	7.62	2.13 - 9.38	4.57 - 7.62	0 - 2.13	81.28	82.12	
MW18-5	1-Oct-2018	4.88	1.52 - 4.88	1.83 - 4.88	0 - 1.52	79.05	79.95	
MW18-6	3-Oct-2018	2.13	0.46 - 2.13	0.61 - 2.13	0 - 0.46	76.39	77.29	
MW18-7	3-Oct-2018	3.66	1.52 - 3.66	2.13 - 3.66	0 - 1.52	78.39	79.25	
MW18-8	4-Oct-2018	1.52	0.46 - 1.52	0.46 - 1.52	0 - 0.46	75.51	76.23	
MW18-9	4-Oct-2018	1.52	0.30 - 1.52	0.46 - 1.52	0 - 0.30	75.29	76.3	
MW18-10	3-Oct-2018	6.4	3.05 - 6.40	3.35 - 6.40	0 - 3.05	79.17	80.14	
MW18-11	3-Oct-2018	4.88	1.52 - 4.88	1.83 - 4.88	0 - 1.52	78	78.86	
MW18-12	1-Oct-2018	6.4	1.83 - 6.40	3.35 - 6.40	0 - 1.83	80.74	81.64	
MW18-13	1-Oct-2018	6.1	2.74 - 6.10	3.05 - 6.10	0 - 2.74	79.3	80.15	
MW18-14	Not Installed					-	-	
MW18-15	5-Oct-2018	1.52	0 - 1.52	0 - 1.52	-0.1 - 0	75.63	76.54	

Notes: Elevations of 2018 sampling locations and located historical MWs have been measured by Leslie M. Higginson Surveying Ltd. In November 2018, with the exception of P8. Ground and Top of Pipe elevation at P8 was surveyed by XCG. Elevations are in masl.

N/V No Value

mbgs = Metres below ground surface masl = Metres above sea level


MARSH AREA
SUSPECTED APPROXIMATE LOCATION OF BURIED WASTE MATERIAL
APPROXIMATE TEST PIT LOCATION (1994, DCS)
APPROXIMATE MONITORING WELL LOCATION (2006, CRA)
APPROXIMATE BOREHOLE LOCATION (2006, CRA)
APPROXIMATE TEST PIT LOCATION (2006, CRA)
APPROXIMATE SEDIMENT SAMPLING LOCATION (2006, CRA)
APPROXIMATE MONITORING WELL LOCATION (2007, ESG, GPS)
APPROXIMATE MONITORING WELL LOCATION (2003, MALROZ, OLD REPORTS)
MONITORING WELL LOCATION (SEPT. 2018, XCG)
TEST PIT LOCATION (SEPT. 2018, XCG)
APPROXIMATE SEDIMENT SAMPLING LOCATION (NOV. 2018, XCG)
APPROXIMATE SURFACE SOIL SAMPLING LOCATION (NOV. 2018, XCG)
ONE OR MORE RESULTS EXCEED MOE TABLE 1 STANDARDS
ALL RESULTS MEET MOE TABLE 1 STANDARDS
FREE PRODUCT OBSERVED IN SOIL
APPROXIMATE EXTENT OF CONTAMINATION
SAMPLE ID
SAMPLE DATE
PARAMETER
RESULTS (µg/g)
DEPTH (METRES BELOW GROUND SURFACE)
RED TEXT INDICATES RESULT EXCEEDS MOE TABLE 1 STANDARD
MOE TABLE 1 STANDARD:
F1 (C6-C10) 25
F2 (C10-C16) 10
F3 (C16-C34) 240
F4 (C34-C50) 120
F4 Grav 120
0 50 100m
DISTRIBUTION OF PHCs IMPACTS IN SOIL (SENSITIVE AREA – LAND)
FORMER DAVIS TANNERY
RIVER STREET
KINGSTON, ONTARIO
XCG
Environmental Engineers & Scientists
DATE JAN. 2019
JOB NO. 1-1420-14-02
FIGURE NO. 15-1
286
SHEET: R114201402003FIG15-1.pdf
FILE: R114201402003.dwg
DRAWING REFERENCE: Figure based on reports by DCS (1994), City of Kingston (2005), CRA (2006), Inspec-Sol (2006), ESG (2013), CRA (2013), 2018 survey (Leslie Higginson Surveying) and XCG field notes.
NOTE: Location of building, underground utilities, etc. are for reference only and should not be relied upon for detailed design, renovation, or construction purposes. Property boundary and building locations shown may not represent actual surveyed boundaries.
RIVER STREET

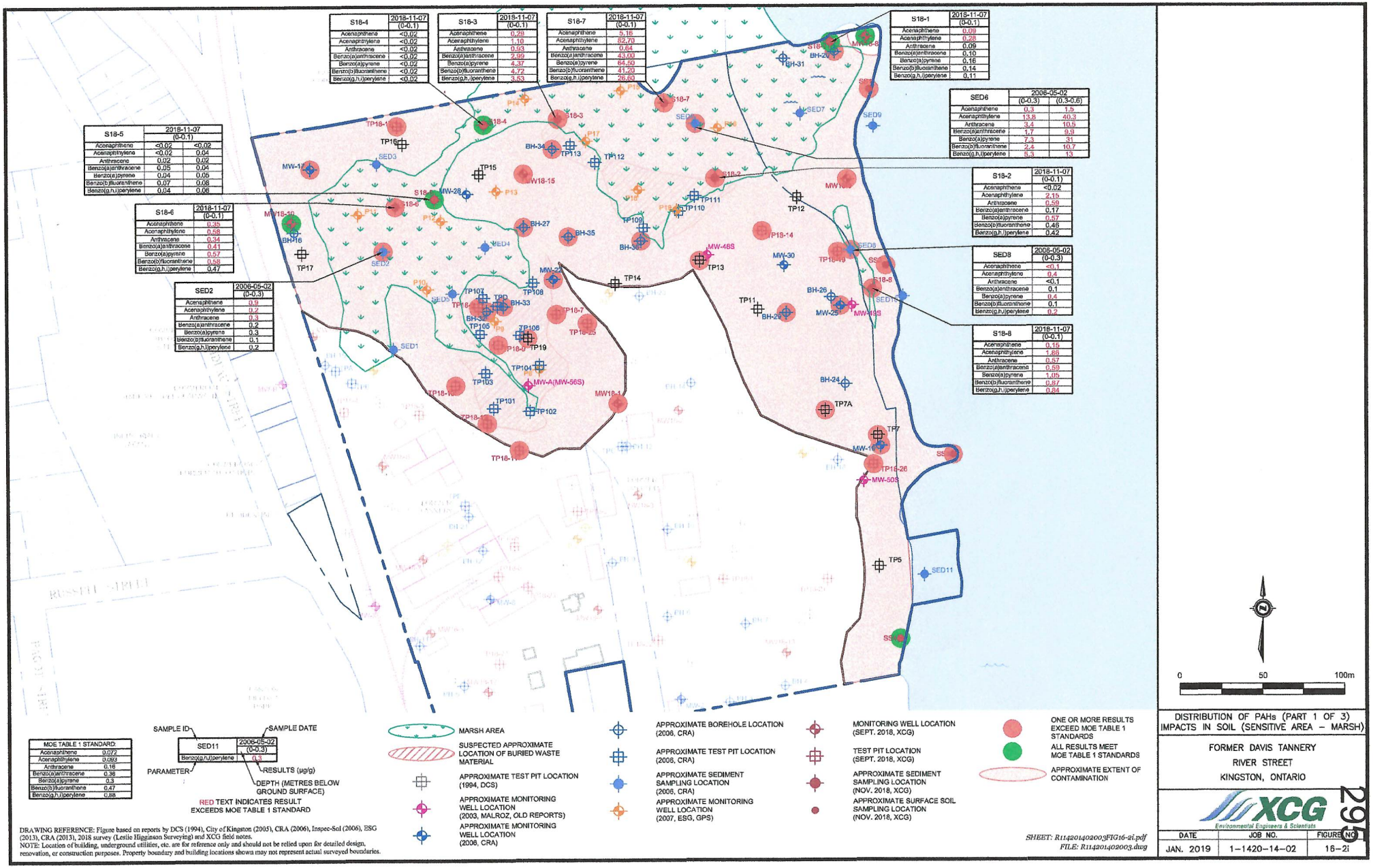


DISTRIBUTION OF PHCs
IMPACTS IN SOIL (SENSITIVE AREA – MARSH)

FORMER DAVIS TANNERY
RIVER STREET
KINGSTON, ONTARIO

XCG Environmental Engineers & Scientists

DATE	JOB NO.	FIGURE NO.
JAN. 2019	1-1420-14-02	15-2



DRAWING REFERENCE: Figure based on reports by DCS (1994), City of Kingston (2005), CRA (2006), Inspec-Sol (2006), ESG (2013), CRA (2013), 2018 survey (Leslie Higginson Surveying) and XCG field notes.
NOTE: Location of building, underground utilities, etc. are for reference only and should not be relied upon for detailed design, renovation, or construction purposes. Property boundary and building locations shown may not represent actual surveyed boundaries.

SHEET: R114201402003FIG16-2i.pdf
FILE: R114201402003.dwg

DISTRIBUTION OF PAHs (PART 1 OF 3)
IMPACTS IN SOIL (SENSITIVE AREA – MARSH)

FORMER DAVIS TANNERY
RIVER STREET
KINGSTON, ONTARIO

XCG Environmental Engineers & Scientists

DATE	JOB NO.	FIGURE NO.
JAN. 2019	1-1420-14-02	16-2i

Table 4: Summary of Sediment Management Options by Management Unit and Overall Degree of Intervention

Unit	Jurisdiction	Overall Priority for Risk Management	Contaminant(s) Targeted for Intervention	Other COC Elevated in Management Unit	Primary Sediment Management Options					Summary of Intervention
					Dredging	Capping	Monitored Natural Recovery	Institutional/ Engineering Controls	No Action	
PC-W	Parks Canada Potentially Private or Municipal Party	Very High	PAHs, PCBs, Cr (birds)	Sb, Pb, Zn	☑	☐	☐	☐	☐	**High Intervention:** Dredging all areas of the management unit with concentrations of PAHs, PCBs, and chromium above low-risk thresholds for fish and birds. This would reduce the harbour wide average of these concentrations, but would remove marsh habitat for listed species and impact habitat for herptiles.
					☑	☐	☑	☑	☐	**Moderate Intervention:** Dredging areas of the management unit with concentrations of PAHs, PCBs, and chromium above moderate-risk thresholds for fish and birds, with the exception of the marsh area, which would be maintained to protect habitat features. Human health risks from exposure to sediment may be controlled by engineering controls, such as a boardwalk or fencing.
					☑	☐	☑	☑	☐	**Low Intervention:** Dredging areas of the management unit with contiguous concentrations of PAHs, PCBs, and chromium above moderate- to high-risk thresholds for fish and birds, with the exception of the marsh area, which would be maintained to protect habitat features. Human health risks from exposure to sediment may be controlled by engineering controls, such as a boardwalk or fencing.
TC-RC	Transport Canada	High	PAHs	Sb, As, Pb, Hg, Ag, PCB	☑	☐	☐	☐	☐	**High Intervention:** Dredging all areas of the management unit with concentrations of PAHs above low- risk thresholds for fish deformities. This would also reduce the harbour wide average concentrations of arsenic, mercury, PCBs, and silver. In the case of mercury and PCBs, these actions would reduce human health risks for consumption of fish.
					☑	☐	☑	☑	☐	**Moderate Intervention:** Dredging all areas of the management unit with concentrations of PAHs above moderate-risk thresholds for fish deformities. This would also reduce the harbour wide average of arsenic, mercury, PCBs, and silver concentrations. In the case of mercury and PCBs, these actions would reduce human health risks for consumption of fish, but with lower effectiveness relative to high-intervention. Shoreline could be engineered to minimize human contact with sediments or isolate contaminated sediments.
					☑	☐	☑	☑	☐	**Low Intervention:** Dredging areas of the management unit with concentrations of PAHs above high-risk thresholds for fish deformities. Additional dredging would be required to remove sediment with elevated concentrations of arsenic, mercury, PCBs, and silver not co-located with PAHs. Shoreline could be engineered to minimize human contact with sediments or isolate contaminated sediments.
TC-AB	Transport Canada City of Kingston Department of National Defense	High	PAHs, PCBs, Cu	Sb	☑	☑	☐	☐	☐	**High Intervention:** Dredging all areas of the management unit with concentrations of PAHs, PCBs above low-risk thresholds for fish deformities, and copper concentrations with the potential to cause toxicity to benthic invertebrates. PAH contaminated areas would be dredged to depth of clean material (2-3 m) and then capped with clean fill. This would assist in reducing the harbour-wide averages of these substances.
					☑	☑	☐	☐	☐	**Moderate Intervention:** Dredging all areas of the management unit with concentrations of PAHs, PCBs above moderate-risk thresholds for fish deformities, and copper concentrations with the potential to cause toxicity to benthic invertebrates. PAH contaminated areas would be dredged to a depth of 1 m below current mudline (where residual contamination may exist) and then capped with clean fill. This would assist in reducing the harbour-wide averages of these substances, but leave some areas with elevated contamination at depth.
					☑	☑	☑	☐	☐	**Low Intervention:** Dredging all areas of the management unit with concentrations of PAHs, PCBs above high-risk thresholds for fish deformities, and copper concentrations with the potential to cause toxicity to benthic invertebrates. Localized hotspots of surface contamination may be dredged prior to cap placement to achieve navigational draft, but such would be limited in extent.
WM	City of Kingston	Moderate—High	PAHs	As, Cr, Pb, Hg, Ag, Zn, PCB	☑	☐	☐	☐	☐	**High Intervention:** Dredging all areas of the management unit with concentrations of PAHs above low-risk thresholds for fish deformities. This would also reduce the harbour wide average of arsenic, chromium, lead, mercury, and PCB concentrations.
					☑	☐	☐	☑	☐	**Moderate Intervention:** Dredging all areas of the management unit with concentrations of PAHs above moderate-risk thresholds for fish deformities. This would also reduce the harbour wide average of arsenic, chromium, lead, mercury, and PCB concentrations. Shoreline could be engineered to minimize human contact with sediments or isolate contaminated sediments.
					☑	☐	☐	☑	☐	**Low Intervention:** Dredging areas of the management unit with concentrations of PAHs above high-risk thresholds for fish deformities. Additional dredging would be required to remove sediment with elevated concentrations of arsenic and mercury not co-located with PAHs. Shoreline could be engineered to minimize human contact with sediments or isolate contaminated sediments.