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Comment(s)	Proponent's Response
<p>The Ministry Review says "...The proponent must consider actions to avoid, reduce and mitigate potential environmental effects." Comments provided to the proponent at the TOR, and EA stages appear to have identified many problems including but not limited to leakage of this Site, wildlife, water, noise, air pollution, traffic, health of the families who live in the area, economic harm, loss of farms and how the Site will look. The overall project would not be beneficial to the community or the environment as a whole. There seem to be very few instances if any which were considered by the proponent to avoid, reduce, and mitigate potential environmental effects. A considerable effort was expended on refuting problems (e.g., water, noise, air, socio economic). Many of which have been dismissed as a result of meeting standards and guidelines.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 34 Groups: 0                      All of these concerns were considered by Taggart Miller in the EASR and associated studies. The design of the CRRRC includes numerous measures to mitigate any potential impact and many operational mitigation measures have also been committed to by Taggart Miller in the EASR. For example, refer to commitment tables 15-1 and 15-2 in Section 15.0 of the EASR.</p>
<p>The standards and guidelines that are used by proponents and the Ministry Review Teams to assess and establish landfills are from 1994, almost a quarter century old. Was noise assessed to current or 1994 standards? Was surface water quality and quantity assessed by comparing pre-development results with post development modelling using a 1994 guideline which limits Site-vicinity study areas to 500m?</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      The standards used for the design and performance assessment of landfills in Ontario are primarily set out in O.Reg. 232/98 Landfill Standards as amended in October 2011.                      Noise was assessed against the requirements of the O.Reg. 232/98, and against the MOECC 2013 NPC-300 guideline, as described in TSD #2 and in Volume IV Appendix B.                      Surface water quality and quantity were assessed against Provincial Water Quality Objectives and the requirements of O.Reg. 232/98. As described in Table 2.3-1, the study area for the surface water assessment was carried out for the sub-watershed area, which extends well beyond the 500 m Site-vicinity study area.</p>
<p>(i) The Ministry's review states that Taggart Miller proposes to handle toxic landfill gases with a "demonstration scale BioPower facility" that it promises to only operate for "24 to 36 months." Otherwise the gases will be "connected to a</p>	<p>Approximate Number of Times Comment Received                      Individuals: 4 Groups: 0                      (i) The gases generated by the landfill will be largely captured by the landfill gas collection system and sent to a flare until such time as a commercially viable opportunity exists to sell power to the grid. Gases</p>

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<p>flare”, and burned off, creating greenhouse gases and downwind air pollution.</p> <p>(ii) The numbers quoted on GHG purport to show the difference in emissions depending on how waste is handled – without ever stating what the GHG emissions associated with 13,500,000 tonnes of waste actually are. Furthermore, there is no comparison provided between the baseline GHG footprint of the forested Site and the Site if the CRRRC were operating on it. The CRRRC project would be a net emitter of GHG and the baseline condition of the Site is a carbon sink (the 400+ acres of growing trees demonstrably sequester carbon). This new facility will only pile onto the GHG footprint of our region, since according to the proponent’s “justification for the undertaking” figures, the CRRRC will not displace any of the region’s existing disposal facilities.</p>	<p>from the BioPower facility, which will be operated at a demonstration scale initially, will also be flared until such time as a commercially viable opportunity exists to sell power to the grid. The flare has been considered as part of the air quality assessment reported in the EASR.</p> <p>(ii) The potential greenhouse gas (GHG) effects are presented in Section 11.2.2.2 of the EA and in Section 5 of TSD #3. The results of the GHG emissions inventory including the summary of predicted annual GHG emissions rates and the GHG emission estimates by emission type are presented in Tables 5-1 and 5-2 of TSD #3, respectively. The quantification methodologies used are based on the Ontario Regulation 452/09 Greenhouse Gas Reporting. Internal to the project, the proposed composting of organic materials from the IC&amp;I waste stream and the proposed collection of landfill gas using a system of horizontal collectors installed within the waste will reduce GHG generation and increase capture of whatever GHG that is generated.</p> <p>External to the project, the management of waste currently being generated by the IC&amp;I sector is presently mostly by landfilling, with a low rate of diversion. The majority of the waste that will be received at the proposed CRRRC will be generated from the City of Ottawa, and is currently being trucked to landfills, some of which are outside of and some distance from the City. The proposed CRRRC will provide a facility for management of IC&amp;I materials closer to their source (which will reduce trucking and associated vehicle emissions). In comparison to simply landfilling the waste as is currently mostly the case, the increased diversion that will be accomplished through the CRRRC will reduce potential air emissions including GHG’s.</p> <p>A comparative life cycle assessment of the proposed CRRRC was carried out to illustrate the GHG benefits of diverting a significant portion of the incoming waste from landfill (see EA Executive Summary page ix). The model used was the GHG calculator created by Environment Canada. As reported, using the permitted annual maximum waste receipts at the CRRRC, the estimated annual GHG emission reductions range from 113,000 tonnes at the low end of assumed diversion to</p>

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	257,000 tonnes CO2 equivalent at the higher end, compared to straight landfilling of these same wastes.
<p>Responder has submitted opinions and observations in the past but is unaware of any specific consideration or response to his concerns. Why were the CESA-EO's submissions disregarded in the Ministry report, given that the group represents a substantial portion of the community at large?</p>	<p>Approximate Number of Times Comment Received                      Individuals: 8 Groups: 1                      Complete responses to the CESA-EO's submissions and all submissions were provided by Taggart Miller to the MOECC and are available by request to the Ministry. The CESA-EO's comments and Taggart Miller's responses were generally summarized in the government review and were fully considered by the MOECC in preparing the government review.</p>
<p>Told that dump attracts rodents like rats.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      As described in the EASR, standard best management measures will be employed at the CRRRC, including daily cover of waste at the landfill component and vermin control.</p>
<p>There was only one dug well test. How can this possibly be sufficient to make a viable assessment?</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      As it relates to dug wells in the vicinity of the Boundary Road Site, the subsurface conditions are quite uniform (limited thickness of fine sand over clay). Dug well construction is also quite similar. Two wells (Boundary-2 for the pumping test component and Frontier-1 for the typical use component), representative of dug wells in the area, were selected for the dug well assessment.</p>
<p>They plan to use a perimeter liner "hydraulic barrier". What is the lifespan of this barrier? What are the effects to be expected when it fails? There is no such thing as a landfill liner that does not leak or fail eventually.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      Details related to the perimeter hydraulic barrier were provided in the response to Public Comment 14 in the Ministry Review. The service life of the sideslope GCL as a hydraulic barrier around the perimeter of the proposed CRRRC landfill is expected to be comparable to the 1,000 year service life reported for a compacted clay liner in O. Reg. 232/98. Groundwater protection measures associated with the CRRRC are described in the main EA report and in Volumes III and IV, in terms of design, operations, monitoring and contingency. The studies and</p>

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	<p>assessments demonstrate that the proposed CRRRC landfill has abundant natural protection provided by the thick silty clay deposit, which, taken together with the engineered design features and the monitoring program, will ensure that the CRRRC will not have adverse effects on off-Site groundwater during the contaminating lifespan of the landfill component.</p>
<p>(i) The consultants employed by the proponent have very little knowledge of the actual subsurface structures surrounding the Vars-Winchester Esker (aka Morewood Esker) and in their investigations made far too few boreholes to assess the underground features of the affected region. The esker provides portable water to seven communities comprising about 17,000 residents as well as many private well systems. It is unknown how the esker is replenished with fresh water. There have been a number of possible sources identified but the experts agree that the total of the supplies from these sources does not nearly account for the water that is extracted from this valuable resource and that possible sources could be a considerable distance from the esker.</p> <p>(ii) According to one individual the lack of adequate borings to assess the subsurface characteristics of this area has entirely missed the fact that the extensive Leda clay in this region near the esker is interspersed with sand and gravel veins or fingers of the esker that conduct groundwater over a very much greater area than contended by the proponent's consultant. Simply put, the presence of Leda clay at the proposed landfill Site is no guarantee against leachate being conducted over a wide area after a breach of the liner.</p> <p>(iii) Vars gets its water from the Vars-Winchester esker aquifer. The source water protection report indicates that</p>	<p>Approximate Number of Times Comment Received            Individuals: 3 Groups: 0</p> <p>(i) The ability of the CRRRC to fully protect off-Site groundwater and surface water in accordance with MOECC requirements was thoroughly assessed by Taggart Miller to the satisfaction of the experts at the MOECC and SNC.</p> <p>(ii) We disagree. The subsurface conditions at the Boundary Road Site were investigated thoroughly. There is no evidence of interspersed sand and gravel veins.</p> <p>(iii) See response to (i) above.</p>

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<p>"waste disposal sites" are the top threat to drinking water. Water flow cannot be confined.</p>	
<p>(i) Concerned with the health of family and children. It is believed that this project does nothing to benefit the community, and actually poses significant hazards to the health and safety of family, friends, and community as a whole. Any contamination that affects health directly cannot be undone. This decision negatively impacts the health of generations to come.</p> <p>(ii) A HHRA should have been completed considering the massive scale, longevity, and concentrated contaminants associated with this project. By not undertaking a HHRA, the proponent has not shown that their EA assessment is protective of human health. The Ministry should have required the human health assessment, which was requested very early in this EA process, during the review of the TOR. Without this assessment, how can anyone say the EA report adequately considers all the environmental impacts of the project?</p>	<p>Approximate Number of Times Comment Received Individuals: 15 Groups: 0</p> <p>(i) The proposed CRRRC has been assessed in accordance with the approved TOR and potential effects compared to relevant MOECC standards, which are intended to be protective of human health and the environment. The details pertaining to HHRA were provided in the response to Public Comment #33 in the Ministry Review. The MOECC has reviewed the response and they are satisfied with the assessment completed.</p> <p>(ii) See response to (i) above. The premise of a HHRA is that the MOECC standards are inadequate, which we do not believe is the case. The EA was conducted in accordance with the TOR approved by the Minister.</p>
<p>The Ottawa Fire Services were never able to provide comments to the EA approvals branch due to the package being sent to the wrong address and arriving at the correct address on the due date (p128 or GRT comments p75). There is not sufficient information in the EA addressing emergency management and fire at the proposed Site. There is currently no water or fire hydrants in the vicinity. If the trickle feed is extended to the area would the system be adequate for dealing with fire? Dump fires contain all types of combustible, toxic materials which water may not be able to put out. How will containment of firefighting water be accomplished to prevent off-Site runoff? Is there a plan designed to protect the general population from airborne contamination in the</p>	<p>Approximate Number of Times Comment Received Individuals: 10 Groups: 2</p> <p>The Ottawa Fire Services EA package was sent to the correct address but was lost in their internal mail system. Although they wrote on their acknowledgement of receipt form that the package was delivered to the wrong address they were subsequently contacted by the proponent and provided a copy of the courier slip that verified the package was delivered to the correct address and signed for by one of their staff.</p> <p>The nearest City fire station is located in Vars, and the City fire services have an established protocol for response to fires in various parts of the City, sequence of back up response locations, etc. The trickle feed water system is not designed to provide flow for fire-fighting.</p>

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<p>event of a disaster such as a fire? Who will pay for emergency response to fires at the CRRRC landfill? Are there studies/stats with regards to fire size, length and toxic emissions available from other existing landfills which could be used in evaluating? Perhaps a report from Ottawa Fire Services is needed.</p>	<p>Information regarding actions in the event of a fire at the CRRRC is provided in Volume IV in Section 6.1.14 and in Appendix I.</p>
<p>There is no indication how the underlying pipes will stretch as the dump takes its saucer shape.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      This question was previously asked by LRL Associates on behalf of the CRCCPE in their comments on the final EA, responded to by Taggart Miller and is in the Ministry Review in comment #11 from the public. The response as provided to the LRL comment in the complete responses is as follows. <i>Since settlement of the subgrade is expected, slip couplings are proposed to be used to connect lengths of pipe (typically 8 metre lengths) as an alternative to butt fusion welding. The leachate collection pipes are made of HDPE, which is a very flexible material. During final detailed design, the expected elongation of all pipe sections will be calculated to ensure adequate slip coupling lengths; on other landfill design projects in similar conditions, the slip coupling length used has been 0.75 m. It should be noted that while there is expected to be 6 to 8 metres of settlement beneath the central portion of the landfill, this is over a 200 metre distance from the edge of the landfill to the centre (along the line of a pipe), which is only a 2 to 3 degree deflection and a pipe length elongation of only about 150 mm or 0.075%.</i></p>
<p>The proposed landfill Site is too close to an established and ever growing population base and farming communities. Lots of Ottawa waste goes to the US so transportation cost can't be that high. Instead of this Site use a huge Quarry or mine up north and get away from the population. You may get larger, more efficient truck loads the farther away the landfill is located.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 8 Groups: 0                      We believe this is an excellent and suitable Site for the CRRRC. It is adjacent to Highway 417 with a neighbouring industrial park. The Site is already partly zoned for this use.</p>

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<p>Property values can be negatively affected by water contamination and how the Site looks. Large commercial farm operations could be rendered unviable. If a resident needs to sell, they will sell below the market price because of that dump. In thirty years from now when the facility is shut down it is the City of Ottawa taxpayers who will be responsible to pay for the clean-up (just like Lebreton Flats).</p> <p>All initial profits and taxation needs to go into a fund until it covers any liabilities, difficulties and associated costs potentially arising from the operation of this dump in the future.</p>	<p>Approximate Number of Times Comment Received Individuals: 18 Groups: 0</p> <p>Taggart Miller has volunteered a 5 kilometre property value protection zone around the Site to address this concern. This far exceeds anything available at the Navan, Waste Management Ottawa (Carp Road) or Lafleche landfill sites.</p> <p>Taggart Miller will be obliged to provide financial assurance to be held by the MOECC to ensure emergency contingency, post closure care and monitoring of the Site.</p>
<p>Can the proponent share the evidence that supports no adverse impacts to property values-little evidence is how much? Should a larger PVPP zone not be provided to capture residents of Edwards, Carlsbad Springs, Russell, and Embun who are outside of the 5km zone? Surely if there is little evidence to indicate property values are not adversely affected then the proponent should not find this an unacceptable undertaking to commit to.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0</p> <p>See response above. A 5 kilometre property value protection zone was recommended by the City for the Waste Management Ottawa (Carp Road) landfill (although not embraced by the owner of that Site nor imposed by the MOECC). This would be the largest such property value protection zone associated with a solid waste management facility that we are aware of in Ontario.</p>
<p>The proposed project is not a recycling plan – it is a landfill with a small recycling component given that only about 20% of the waste going there would in fact be recycled (by the proponent's own admission). In the Ministry Review page 2: Why: Since disposal is the largest component of the Site, "waste disposal" should be listed as the primary purpose. If they plan to operate a true recycling facility should they not be obligated to recycle at least 80% of what is brought to their Site in order to benefit the environment? The size of the proponent's landfill (10.7 million cubic metres capacity) is large enough to disposal all the incoming waste at the CRRRC (13.5 million tonnes total) for 30 years with virtually no recycling. The diversion rates quoted at the end of the first</p>	<p>Approximate Number of Times Comment Received Individuals: 11 Groups: 1</p> <p>Incorrect. Taggart Miller is projecting diversion ultimately of somewhere between 43 and 57% of the incoming waste stream. It is correct that these are targets. The ability of Taggart Miller to meet these targets will depend on many factors, including generator co-operation, end markets, performance of technology and new government regulations. The Waste Diversion Protocol proposed by Taggart Miller is intended to ensure Taggart Miller uses commercially reasonable efforts over time to maximize diversion. As stated in Section 9.1 of the main EASR, the landfill airspace will accommodate only roughly half of the material projected to be received at the CRRRC</p>

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<p>paragraph are targets, not promises. There is no commitment in the proponents' EA to divert more than the average for the IC&amp;I waste stream, which is roughly 16%. Landfills bury billions of dollars of potential energy.</p>	<p>over a 30 year operating period. This comment was previously addressed in the Ministry Review public comment #4.</p>
<p>(i) The Ministry states that the "waste stream that has high organic content" will be processed in the compost facility, but only if the organic waste arrives at the facility "source separated". In other words, the compostable material must already be separated out. The terms "high organic content" and "source separated" are never precisely defined but if these conditions are not satisfied the material is residual waste and will be dumped.</p> <p>(ii) Many of the recycling ideas mentioned for the project might never be built: The organics plant is a 2-3 year demonstration – no commitment beyond that; the materials sorting is conditional on "market conditions"; the methane to energy plant is conditional on various possible government decisions; and the "source separated" organics also might never arrive, since that too is stated as conditional upon future government action.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 1</p> <p>(i) The Waste Diversion Protocol for the CRRRC indicates that mixed IC&amp;I wastes that have over 50% organics will be sent to the BioPower facility, which is designed to be able to handle both source separated and mixed organics. The Waste Diversion Protocol is available in the complete response to comments in the hard copy of the Ministry Review, by request or on the project website.</p> <p>(ii) Taggart Miller has committed to build all the diversion components at the time of commencement of Site operations, as described in TOR commitment C in Table 15-1 of the main EASR. Taggart Miller are committed to organics diversion and processing at the CRRRC. The BioPower facility will be demonstration scale first at the request of the MOECC, but will incorporate all the components of the proposed full scale facility. If the demonstration scale facility is not successful, an alternate approach will be developed.</p>
<p>The proponent states that the majority of waste will not be from the C&amp;D sector. How can this statement be true considering Taggart is a construction company which builds housing communities etc. In fact in section 2.2 "Description of the proposed undertaking", C&amp;D and IC&amp;I is number one on the list.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0</p> <p>Our assessment of the available commercial waste stream (Section 9.1 of the main EASR) is that approximately 20 to 25 % will be C&amp;D waste and approximately 50 % will be IC&amp;I waste (excluding IC&amp;I organics), and about 65% if organics are included.</p>
<p>(i) Another dump in the City of Ottawa is not needed, there are more than enough to accommodate the City's needs. Eastern Ontario already has more large landfills per person than any other region of Ontario. Ottawa has more landfill space than any other area in Canada. The justification the proponent uses to defend their project is based on disposal</p>	<p>Approximate Number of Times Comment Received Individuals: 30 Groups: 2</p> <p>(i) As described in public comment #4 of the Ministry Review, the business case for the proposed CRRRC is set out in Supporting Document #1 to the approved TOR. An essential component of the business case for the CRRRC is to help address the woefully low</p>

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<p>capacity numbers – not recycling needs. For the facility to be viable it will need to establish a low tipping price, causing lower incentives for recycling, or alternatively, bring in waste from other areas.</p> <p>(ii) Based on figures from the MOECC website (published January 23, 2014), the total approved annual waste disposal capacity (for municipal and IC&amp;I combined) for eastern Ontario is 2.3 million tonnes/year, counting the Carp Road (Ottawa) expansion, Navan Road, Trail Road, Springhill Road. The total waste generated in Ottawa is 1.1 million tonnes/year. Waste is already being imported into our Region to satisfy landfill operator's business requirements. The MOECC's figures prove there is more than sufficient local waste disposal capacity for the next several decades, without projecting for likely expansions of our existing waste facilities, which can reasonably be expected to be proposed during the next 30 years. Efforts to increase diversion rates would expect to further reduce the annual volume of disposal capacity needed in the Region.</p> <p>(iii) The Ministry Review says "The project could assist in achieving City and provincial IC&amp;I/C&amp;D diversion objectives". The last sentence begs the question as to either it does or it does not. This report does not appear to answer this and frankly it should. What evidenced based confirmation was received from the City of Ottawa or Ontario to support the positive validation of the business model proposed. While this may be all as a result of poor structure and wording it nonetheless begs these questions and also calls into question the relevance of the Terms of Reference in regards to the necessity of yet another landfill site.</p> <p>(iv) The Ontario Government has put out a draft strategy for a waste free Ontario: building the circular economy. In this strategy the plan is to reduce waste and recycle more which</p>	<p>commercial waste diversion rate in the Capital Region, which has been stuck in the range of 12 to 14% for years.</p> <p>(ii) See response to (i) above.</p> <p>(iii) The City staff report on the proposed CRRRC states that the CRRRC "will have a significant bearing" on the City achieving its IC&amp;I and C&amp;D waste diversion targets.</p> <p>(iv) See response to (i) and (iii) above. Taggart Miller believe that the circular economy concept aligns well with and supports the business case for this project.</p>

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<p>means a reduction in the amount of waste to go to landfill. It would seem reasonable that the first option would be to rework the landfill Sites currently in operation to comply with the plan. Why would there be need for a new landfill which will result in irreversible damage to the environment on many levels?</p> <p>(v) There is a fundamental inconsistency between the proponent's assertion that the purpose of the CRRRC project is recycling, and the proponent's attempt to use landfill capacity arguments to prove the rational or need for the project.</p>	<p>(v) See responses to (i), (iii) and (iv) above.</p>
<p>(i) This project gives Toronto and other large municipalities a place to dump their ICI and C&amp;D waste, but to the detriment of the local community.</p> <p>(ii) Some places south west of the Site have already decided to send their waste to this Site and it isn't even approved. Did these municipalities already receive private information from the Ministry before a decision has been announced?</p> <p>(iii) Should trucks start arriving from the Belleville transfer station carrying Toronto waste, Ottawa voters will be outraged.</p> <p>(iv) Michelle Taggart said on CBC radio that the environmental assessment sets out a strict catchment area. That is not the case, as you know.</p>	<p>Approximate Number of Times Comment Received Individuals: 18 Groups: 0</p> <p>(i) Not correct. As explained in public response #4 in the Ministry Review, the service area for the proposed CRRRC is clearly set out in the EA and is restricted to a portion of Eastern Ontario. The primary service area is the City of Ottawa.</p> <p>(ii) Incorrect. The CRRRC is seeking approval for IC&amp;I waste only.</p> <p>(iii) See response to (i) above.</p> <p>(iv) See response to (i) above.</p>
<p>Seriously concerned about the impact to their soil as they grow their own fruit and vegetables.</p>	<p>Approximate Number of Times Comment Received Individuals: 2 Groups: 0</p> <p>The proposed CRRRC was assessed against MOECC air quality standards, which are designed to be protective of human health and the environment.</p>



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<p>(iii) The Agricultural Section in the EA report indicates that based on the findings of the proponent's agricultural impact assessment, no agricultural impacts of any significance are predicted and no mitigation measures or monitoring specific to agriculture are recommended. This is completely unacceptable. Many of the farms in close proximity to the Site use systematic tile drainage. Leachate can flow freely within these drains and will impact crops and livestock as well as the water the livestock consumes.</p>	<p>(iii) See response to (ii) above. There is no plausible pathway for leachate to reach off-Site tile drainage systems.</p>
<p>(i) This document is void of risk mitigation details should things go wrong and contamination via leachate or some mishap occur.</p> <p>(ii) How does the proponent guarantee the leachate tankers won't be leaking on our roadways. Further, given climate change and potential increase in precipitation why is there no emergency plans or any alternative plan for handling leachate. The required alternative leachate management plans must be identified and the impacts thoroughly described and modeled (which is the purpose of the EA), since it is clear the "preferred plan" for leachate is not adequate.</p>	<p>Approximate Number of Times Comment Received Individuals: 2 Groups: 0</p> <p>(i) See Section 14 of the main EASR report concerning monitoring and contingency plans. Also see Tables 15-1 and 15-2 (the Table of Commitments)</p> <p>(ii) Leachate haul trucks will be monitored by Site personnel as well as contractors. The EA does contain contingency plans for short term leachate management. ROPEC, the City wastewater treatment plant, is operating well below capacity.</p>
<p>(i) Clearly by the comments received, there are social impacts and a stigma that goes with the inevitable pollution of this project that cannot be mitigated. Why was there no assessment of individuals (residential landowners (employment, tax revenue, goods and services required for construction))? Was that because of the 1994 standard and the 500 m limited Site-vicinity study area imposed by that standard? What about the interests of those who submitted form letters?</p> <p>(ii) No Social Impact Assessment (SIA) was performed as part of the EA. The TOR did not contemplate a formal SIA. The MOE status statement and proponent response appear to be</p>	<p>Approximate Number of Times Comment Received Individuals: 4 Groups: 0</p> <p>(i) Public comment #34 of the Ministry Review discusses potential social impacts. An economic impact assessment was carried out for the proposed CRRRC in accordance with the approved TOR and is contained in the EASR.</p> <p>(ii) Social impacts were considered in accordance with the approved TOR, as required under the Environmental Assessment Act. Comment #5 in Table 2 of the MOECC Review is in regard to PPVP, while comment #34 is in regard to SIA; we do not understand how the positions taken on these comments "appear diametrically opposed."</p>

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<p>anchored to and reflective of the 1994 standard in respect of a 500m limited Site-vicinity study area. Ironically the proponent and ministry positions reflected for comment #34 appear diametrically opposed to that recognized in comment #5. How is a 1994 standard appropriate?</p>	
<p>(i) So far, several Species at Risk and fish hatchery habitats are not assured any protection in the plan for the proposed waste facility, which would be dominated by a vast landfill. Rather than protecting Species at Risk, this Environmental Report for this 450 acres proposed Taggart-Miller landfill with a small recycling component, indicates the total eradication of their habitat by means of cutting down all the trees and severe disruption or removal of several waterways. The value of the Site was noted by the National Capital Commission when they identified the parcel as a "wildlife corridor" in their recent Greenbelt expansion map (2912) which is also mentioned in the EA. Unfortunately, the EA does not champion the natural value of the Site. The Ministry Review (Page 15: Biology) doesn't address this.</p> <p>(ii) There is concern that all the animals will be displaced, that some of the biology studies were not completed appropriately (for example frogs and moose) and that frogs will disappear from neighbouring property as an environmental indicator of a problem.</p> <p>(iii) The assessment of the impacts on the natural environment and biology have been superficially addressed.</p> <p>(iv) The project is significant in scale, longevity, and concentration of potential contaminants. It involves habitat for SAR as well as interference with fish-bearing waterways. Rather than protecting SAR, the EA indicates the total eradication of their habitat as well as the removal of several waterways which will impact the local spawning fish.</p>	<p>Approximate Number of Times Comment Received Individuals: 8 Groups: 1</p> <p>(i) All Species at Risk and potential fish habitats were assessed and will be handled in accordance with applicable regulatory requirements. The NCC is satisfied with the EASR and its assessment of the CRRRC.</p> <p>(ii) The biology assessment was conducted in accordance with the approved TOR, to the satisfaction of the MNRF.</p> <p>(iii) See response to (ii) above.</p> <p>(iv) See responses to (i) and (ii) above.</p>

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<p>Who represents the community on the community liaison committee? Should there not be a community stakeholder committee? In fact there should be community consultation long before a project has submitted a TOR in order for a community to decide if a project is accepted by the community.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      There will be consultation with the community as well as advertisements to solicit the community members of the Community Liaison Committee (refer to Commitment 77 in Table 15-2 of the main EASR). There was a public consultation process on the proposed TOR as well as the opportunity to submit comments to the Minister before he approved it.</p>
<p>The proponents state there are no “energy from waste” facilities in the area. Not true. Lafleche at Moose Creek has an energy from waste project in conjunction with Hydro Ottawa. It is so successful they are planning to expand it. This facility could be integrated with Ottawa. They have a sorting and transfer station already running right in Vars at the interchange. They also have more than enough available unused annual quota.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      There are no large scale energy from waste facilities in the Capital Region. The business case and opportunity for the proposed CRRRC is set out in Supporting Document #1 to the approved TOR.</p>
<p>Public Consultation is supposed to be “meaningful”. The proponents have failed on that count, and have failed to remedy the issue when requested – such as when complete French translations have been repeatedly requested, to fairly inform our francophone population. 98% of consultation events were in English and engineers present didn’t speak French. The slide show was in English. The technical documents were in English.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 2 Groups: 2                      Taggart Miller has gone to great lengths to provide the opportunity for those who prefer French to consult on the project in that language. The Project Manager is fully bilingual. All open houses were conducted in both French and English. French speaking personnel were available at the groundwater workshops. The Executive Summary of the TOR was translated into French, as was the main EASR report. This is discussed in the Ministry Review Table 1 comment #3 and Table 2 comment #19.</p>
<p>While British Columbia has regulations that require seismic activity be considered in such a proposal, Ontario does not. The Site is near a fault line and would be rejected in many parts of the continent based on their current regulations. Even the EPA Guidelines in the USA state the obvious. When selecting suitable sites for a landfill, avoid a site within fault zones; with potential ground motion, and with liquefaction potential.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 3 Groups: 2                      The potential for seismic activity and impacts has been assessed by Taggart Miller using both Golder and academic experts, as described in Volume III of the EA and in the Ministry Review public comment #8.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>No other dump presently located in Ottawa rests on the class E soils from the City's "Seismic Site Classification Map".</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      The Progressive Waste landfill site on Navan Road within the City of Ottawa is located in an area shown as Site Class E, as would be expected for an area underlain by a thick clay deposit.</p>
<p>The Site is adjacent to the 417 – this is the welcoming view for visitors to Ottawa.                       At the Boundary Road exist you will see the facility.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 4 Groups: 0                      As described in the Ministry Review public comment #32, the proposed CRRRC will be adequately screened from Highway 417 and other locations, as described in Section 11.6.3 of the main EASR.</p>
<p>Why use a "fuel oil fired heating system" in a purportedly green project as noted in the Ministry Review Page7, Paragraph2? The Province has initiatives to do away with oil-fired heating. Is Taggart Miller intending to burn "used oil" for heat? Precisely what scrubbing technologies will be used to prevent airborne emissions from that activity? The GHG impacts of this activity have not been modelled. Such activities are contrary to the proponent's claim that this project will support Ottawa's "Air Quality &amp; Climate Change Management Plan".</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      As described in TSD #3, the fuel oil fired heating components were included in the CRRRC air quality assessment modelling, the results of which demonstrated compliance with provincial air quality requirements.</p>
<p>All modelling for the environmental impacts of the landfill should be premised on the assumption that organics will be in the landfill. As indicated in the Ministry Review, the organics facility will accept source separated organics only, thus it is assumed if this condition is not satisfied, that the material is residual waste and will be dumped. Also, given that the BioPower plant is only a 2-3 year demonstration facility, which will only handle up to 23,000 tonnes/year (the proponent projects receiving 70,000 tonnes/year in full operation), and as the project contains no longer term commitment to effectively divert organics from the landfill, and thus it is assumed organic waste will make its way into the landfill. Therefore, all modelling should be premised on the</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 1                      The groundwater modelling for the CRRRC used the least favourable leachate parameters based on the MOECC recommended parameters and concentrations (Ontario Regulation 232/98) and leachate data from a similar IC&amp;I landfill. Taggart Miller have committed to organics diversion even if the BioPower facility does not prove out. The potential impacts of leachate on clay soil have been well studied and are described in the EA and the related responses to the same question.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>assumption that organics will be in the landfill. Presently, the opposite is true, making the modelling invalid, in light of the fact organics diversion is not guaranteed. Equally, given that organic compounds and by-products can have a major implication on the clay and liner materials, it must be factored into the studies and modeling undertaken.</p>	
<p>In the studies the Site vicinity was reduced – not extended as indicated in the Ministry Review: Page 14: Study Area. The justification for this reduction remains contentious, since air impacts are not impeded at all by roadways. The prescribed study area would have included a portion of the projected Cumberland Forest. Failure to study potential impacts on this sensitive area undermines the credibility of the proponent's claim they would operate the City's largest waste facility in an environmentally respectful manner.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      As described in Section 2.3, Table 2.3-1 of the main EASR, the only environmental component for which the study area was reduced from the 500 m Site-vicinity study area was for cultural heritage resources, in accordance with the MTCS 2011 standards.</p>
<p>For the first 1.5 years after the NOC for the CRRRC, no consultations took place in the community of the "preferred Site", neither was there any hint that Russell Township was being compared to an alternative location on Boundary Road (City of Ottawa). The initial Open House covering the "preferred Site" was held at a Community Centre 13km from Carlsbad Springs, even though a suitable public facility exists in the impacted community. Repeated requests for meetings with the Community were refused by the proponent.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 0 Groups: 1                      An Open House was scheduled in the Carlsbad Springs area (Navan) when the Boundary Road Site was introduced to the process. It was very well attended. The Navan location was selected based on information about the Carlsbad Springs Community Centre (CSCC) on that facility's website, which indicated that the capacity of the CSCC was too small for the anticipated public attendance. All subsequent Open Houses have been at the CSCC.</p>
<p>To ensure protection of the aquatic, hydrologic, and geomorphic attributes of the headwater drainage features the best practice is to use the Evaluation, Classification and Management of Headwater Drainage Features Guideline developed by the Toronto and Region Conservation Authority (TRCA) and Credit Valley Conservation.</p> <p>The Site constitutes the headwaters of Shaw's Creek which feeds into the Bear Brook Creek. Headwaters are considered</p>	<p>Approximate Number of Times Comment Received                      Individuals: 0 Groups: 2                      As described in Table 1 of the MOECC review, comment #150, the completion of the Headwater Drainage Assessment (HDA) is a standard requirement for obtaining the permit needed to alter a watercourse within SNC's jurisdiction, and is done at the design stage prior to construction. Taggart Miller will complete this assessment and determine any associated requirements as part of subsequent approvals for the CRRRC project.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>natural heritage features by the City of Ottawa and are afforded protection from complete destruction – the proponent's plan calls for the total removal of the natural environment from this Site.</p>	
<p>A major shortcoming is that it is assumed that the settlement of the landfill will be evenly distributed across the entire footprint of the landfill, resulting in a simple bowl like shape. Our experts disagree and believe that the planned phased loading of the landfill will more likely result in uneven, stepped settlement which would disrupt the gravity based leachate collection system.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 0 Groups: 1                      Effects of settlement on the leachate collection system are discussed in Section 3.6.5 of Appendix I of Volume IV of the EA. Redundancy has been built into the proposed leachate collection system piping network by maintaining continuity of the leachate header piping between adjacent Phases and manholes such that leachate could flow to an adjacent subgrade drainage area or Phase should localized higher degrees of subgrade settlement be experienced that locally affect leachate conveyance.                      Even with the anticipated differential settlement, the overall slope of the base of the landfill will be towards the sumps (in areas of maximum waste thickness and therefore maximum settlement). The leachate collection system is comprised of not only a network of pipes but also a granular drainage blanket covering the entire base of the landfill that will continue to convey leachate to the low points (sumps) for collection.</p>
<p>The Government Review Team state that the Environmental Assessment does not contain adequate modelling of possible downstream effects from the landfill Site. Phosphorus loads are a particular concern downstream of landfills, and are already a concern in the South Nation watershed. The reviewer's request for additional modelling was not satisfied and the Ministerial review does not resolve this discrepancy.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 0 Groups: 1                      The City of Ottawa made the comment about modelling as recorded in Table 1 of the Ministry Review, Comment #202.                      In view of the proposed leachate collection system and on-Site pre-treatment of leachate for conveyance to ROPEC for final treatment and discharge, increased phosphate loadings to surface water in the vicinity of the CRRRC Site are not anticipated. The MOECC was satisfied with the response to the City modelling comment in the Ministry Review.</p>
<p>While a comparative evaluation of both on-Site pre-treatment/off-Site treatment and complete on-Site treatment was undertaken, no further elaboration, no studies, no</p>	<p>Approximate Number of Times Comment Received                      Individuals: 0 Groups: 1</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>detailed information, and no information on supplementary management plans was provided for the complete on-Site treatment option. This does not satisfy the TOR.</p>	<p>We do not share this interpretation of the TOR. MOECC has indicated in its review that the TOR requirements have been satisfied.</p>
<p>(i) The cumulative effects have not been completed to a degree of completeness worthy of an EA level study. The analysis of effects within the EA is so generalized and vague that it is difficult to reach any traceable conclusions.</p> <p>(ii) The cumulative dust concentrations should be quantified by geographic location; the proponent's response was that "Quantitative impacts were not relevant as this information is not available for the other projects and activities that were considered in the assessment". The potential impacts are relevant and this is totally unacceptable.</p>	<p>Approximate Number of Times Comment Received Individuals: 0 Groups: 1</p> <p>(i) In accordance with the TOR, the EA employed an approach to cumulative effects analysis using guidance from Environment Canada and the United States, in the absence of MOECC guidance.</p> <p>(ii) The cumulative impact assessment considered impacts that could overlap in time and space. Where quantitative information was not available, of necessity, the assessment was carried out on a qualitative basis.</p>
<p>(i) The proponent provides assurance that the clay at the Site is "impermeable", which is inaccurate. The Site is not comprised of bentonite clay but rather a very sensitive form of 'quick clay', which is the most problematic form of Leda clay which can fail under phased loading or undergo liquefaction under seismic shaking.</p> <p>(ii) The permeability of the "silty clay deposit" is not uniform, since the Site is underlain by clay banded with layers of sand. The clay has lower permeability than the sand, but the sand is certainly not accurately described as "low permeability".</p> <p>(iii) The proponent is not proposing to line the bottom of the landfill which is totally unacceptable. The Leda clay at the Site is not waterproof and is not suitable as a liner.</p> <p>(iv) Taggart-Miller has indicated that there are minimal issues with the Site soil conditions as two local landfills are built on similar clay soil. A significant difference with the Boundary Road Site is that it has three times the depth of Leda clay with horizontal water saturated sand layers. This creates unique</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 1</p> <p>(i) The clay at the Site is low permeability, as demonstrated by the on-Site investigation and lab testing program. The characteristics of Leda clay were fully considered by Taggart Miller in the EA. See also the June 2016 report by Professor Locat.</p> <p>(ii) There is no evidence from the extensive on-Site investigation program that the clay is "banded with layers of sand."</p> <p>(iii) As shown by the leachate migration assessment in the main EASR and Volume III, the 30 metre clay deposit provides a high degree of natural protection against leachate migration. This conclusion was shared by the MOECC hydrogeologist.</p> <p>(iv) The Boundary Road Site does not have "horizontal water saturated sand layers." The geological characteristics of the Site were fully considered by Taggart Miller. See also the June 2016 report of Professor Locat.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>engineering and containment challenges at this location, which the proponent minimizes.</p>	
<p>To address changes in precipitation and temperature that could affect the vegetative cover and runoff of surface water leading to an exceedance of the capacity of the storm water retention ponds, the proponent mentions possibly increasing storm water retention pond capacity. This will be difficult on a Site where the water table is at the surface – the Site is practically underwater every spring. The public has no confidence that severe storm events will be handled well post-closure, or during actual operation.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 0 Groups: 1                      Development of the Site will include the establishment of a surface drainage system, which will alleviate the spring flooding conditions that currently exist and will result in some modest lowering of the groundwater table. The position of the groundwater table has been considered in the design of the stormwater ponds to ensure they have the required storage capacity to handle up to the 100-year storm event as required by O.Reg. 232/98. There are various ways to increase pond capacity, if required, i.e., expanding the area of the pond, constructing low berms around the pond and adjusting the outlet control accordingly.</p>
<p>(i) It is quite concerning that interests by the public appear to have been reduced to that provided in this report which are a summary in table format of the individual concerns and the proponent's responses to comments that were categorized into "individual" and "form letter" issues expressed by concerned individuals. It is understood the proponent was being provided an opportunity to address concerns submitted because the Minister had forwarded them for their consideration, however the end result seems to be dismissive and an affront to not only the public's interests as impacted individuals but also an affront to that which is purportedly being portrayed as an inclusive and democratic participatory regulator process. Indeed, some of the language in the report and the absence of meaningful personalized responses by elected and non-elected government officials serves to amplify this concern.</p> <p>(ii) If the public is not receiving all the relevant information about its issues (from the MOECC), how can the public do a proper technical review and how can the Minister be assured</p>	<p>Approximate Number of Times Comment Received                      Individuals: 51 Groups: 3                      (i) All public comments and the proponent's responses were carefully considered by the MOECC.</p> <p>(ii) The MOECC has not withheld anything. Information has been provided on request and MOECC files have been available on request.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>that he has all of the information for his ultimate decision to approve or refuse this project? Based on what was included in the Ministry Review document it is confusing and upsetting that the Ministry staff seemed quite satisfied with the proponent's response to each of the public's technical issues. Why does the Ministry withhold important technical responses to the public's concerns? The public wants to see the proponent's responses to its review comments. It is simply not good enough to be told that it is in the project file at the Ministry's Toronto office for viewing at the public's convenience.</p> <p>(iii) Why is the document void of the identities of all the experts who have responded to the comments.</p> <p>(iv) In a letter of 20 February 2015 to Lorna Zappone, a stakeholder commented: "...the only charitable way to explain the huge number of oversights and lapses in the EA report was that the consultants who prepared the report must have concluded that the proposal was untenable. It is thought that in order to covertly express this, they incorporated lapses which would make the report unacceptable to regulators. I urge the Ministry of the Environment and its Climate Change evaluators to consider this hypothesis in evaluating the EA." In the recent Ministry review of public comments on the EA, this comment was not included. Is there an explanation for this oversight which does not somehow implicate the bureaucracy of the MOECC in collusion with the proponent of this dump?</p> <p>(v) Very disappointed that the assessment failed to address many of the concerns being raised by members living in the areas of the proposed Site.</p> <p>(vi) Many of the issues that were identified in our review of the Final EA Report have not been adequately addressed in the Ministry Review. It is disappointing to note that Ministry</p>	<p>(iii) For MOECC disposition.</p> <p>(iv) This comment does not raise any discrete technical or environmental issue. It was however included in the complete public responses available in the hard copies of the Ministry Review or by request from the MOECC.</p> <p>(v) The EA studies were carried out in accordance with the approved TOR, as required by the Environmental Assessment Act.</p> <p>(vi) All issues/concerns raised by commenters on the EA and the proponent's responses were carefully considered by the MOECC.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>staff has almost universally discounted the concerns and information that was put forward by publically retained experts. The Ministry Review contains vague comments on the concerns and questions raised without requiring further elaboration, and provides no critical analysis and no detained information for the stakeholder groups and technical experts to comment on.</p>	
<p>(i) There are serious concerns that the Ministry staff is not undertaking a critical review of the proponents work and appears to be only a cursory review and almost a rubber stamp approach to these environmental assessments. The public was hoping for a much more rigorous review of the proponents work by the Ministry and the Government Review Team.</p> <p>(ii) Very real, scientifically backed concerns have been raised about this project and without justification, the proponent has repeatedly said it was studied and everything will be OK and the Ministry has sided with them in every case. The hydrogeology, geologic and seismic conditions, risk to wildlife, odour, traffic, impact to farmland and every other aspect of their studies are not conclusive.</p> <p>(iii) "...Ministry staff, with input from the GRT, evaluates the technical merits of the proposed undertaking, including the anticipated environmental effects and the proposed mitigation measures. The Review also provides an overview and analysis of the public, agency and Aboriginal community comments on the EA and the proposed undertaking." It appears two different standards are at play here – an evaluation on one hand for scientific issues and an overview and analysis on the other for socio economic issues – why is that? It appears the analysis was conducted by the proponent when examining the report-comments from individuals received by the Minister were responded to by the proponent</p>	<p>Approximate Number of Times Comment Received            Individuals: 10 Groups: 1</p> <p>(i) See response above.</p> <p>(ii) See response above.</p> <p>(iii) See response above. All issues and concerns were carefully considered by the MOECC.</p>

Public Comment Summary Table 2

Comment(s)	Proponent's Response
<p>in a table format with little if any commentary from the GRT on non-technical issues.</p> <p>(iv) In the conclusions segment of the Ministry Review it says Taggart Miller has provided responses to all documents received. Responses were provided to whom? It is suspected this does not extend to comments directed to the MOECC notwithstanding that they were purportedly referred to the proponent for consideration. This stakeholder has never received a response other than an acknowledgement of receipt of the February 2015 letter from the MOECC.</p>	<p>(iv) Taggart Miller responded to all comments received and provided the responses to the MOECC. These responses are summarized in the government review and the complete responses are on file with the MOECC and contained in the hard copies of the Ministry Review.</p>
<p>v) Golder Associates has made one valid criticism of opponent's seismic work but they also distorted the truth and left out vital geological information that is not favourable to their client and the MOECC and minister have allowed it. Ministry staff were told in several letters that were written but staff ignored those letters. The behavior of the MOECC is appalling as they have given every indication that they are not an impartial judge in this matter. It appears that the MOECC is hell-bent to approve the mega landfill despite serious criticisms from several professional scientists.</p>	<p>(v) Mr. Wallach's letters to date have all been responded to by Golder and those responses have been provided to the appropriate members of the GRT for review and comment. No information provided by Mr. Wallach has been ignored.</p>
<p>(i) How can the ministry be "satisfied" with the monitoring and contingency plans without benefit of the NRCan and OGS review of the Golder report? How can a review or approval be concluded and or approved when clearly there are differing expert opinions in respect of the soil conditions impacting key environmental issues addressing the suitability of this Site?</p> <p>(ii) In the seismicity section of the review on what basis can the MOECC justify using such pejorative language as "discredits", "insufficient", use of and attribution of "licensed professional and independent experts" to the proponent's position without a balanced representation of the opponents?</p>	<p>Approximate Number of Times Comment Received            Individuals: 8 Groups: 1</p> <p>(i) The government review acknowledged that further comments were awaited from NRCan and OGS, and any comments concerning additional work or monitoring or contingency plans will of course be considered by the MOECC. Comments have, however, already been provided by those agencies on the draft EASR, the findings of which on these matters is very similar to what was presented in the final EA.</p> <p>(ii) The MOECC carefully considered the assessments of both the proponent and opponents on seismic matters, as well as the input of the Government Review Team.</p>

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Comment(s)	Proponent's Response
<p>This may be disrespectful. It would seem to imply that MOECC's position might be that of the proponent – is it? If so how can that be when it has been acknowledged that NRCan and OGS have yet to review and report prior to a Minister's decision.</p> <p>(iii) It states that the Ministry staff are satisfied Taggart Miller has met the requirements of the TOR, EAA, and EA. On what basis can it be said they have met the requirements of the EAA and EA when there is an outstanding review by NRCan and OGS? More often than not the status indicated in the tables in Appendix B says that the ministry was satisfied with the proponent's response or position taken. However, it does not address the systemic issue of the relevance and application of a 1994 standard and that would impact the status statements made by the ministry.</p> <p>(iv) There are serious expert disagreements on seismicity that ultimately speaks to the suitability of the proposed landfill Site.</p> <p>(v) It is extremely worrisome that Golder were actually aware of a peer reviewed article written by CRCCPE's seismic expert and published in a respected scientific journal during the preparation of the EA. They included it in a list of references, yet deliberately chose not to discuss it in the body of the EA. By not addressing it during the preparation of the EA, Golder obviously failed to take into account all relevant information. Naturally, one wonders what else they have decided to be selective about.</p> <p>(vi) Conclusions: "The EA (etc.)...contained sufficient information to assess the potential environmental effects of the proposed undertaking." This statement contradicts observation of several reviewers who requested – and were refused – additional data and modelling. Furthermore, the technical reviews from 2 key agencies have not even been</p>	<p>(iii) MOECC is satisfied subject to considering the further comments of NRCan/OGS and the proponent's responses to same. It is not apparent what 1994 standard is being referred to.</p> <p>(iv) MOECC has carefully considered and will continue to consider the submissions of all parties on seismic matters.</p> <p>(v) Mr. Wallach's paper was considered by Golder during preparation of the EA. That is why it was listed as a reference.</p> <p>(vi) The submissions of all commenters were carefully considered by MOECC. NRCan and OGS have already commented on the draft EA. Their further comments on the final EA were outstanding and noted as such during preparation of the MOECC review.</p>

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Comment(s)	Proponent's Response
<p>submitted never mind evaluated in this review, even after a year delay. So the concluding statement above is not founded on the substance of this review.</p> <p>(vii) At this late stage it is more than surprising that Natural Resources Canada (NRCan) and the OGS have yet to review Golder's report related to the subsurface structure during the Ministry review period.</p> <p>(viii) Considering that the Ministry Review has been made available for a five-week public comment period, the forthcoming review from NRCan and OGS should also be made available for comment through a second round of the Ministry Review of the EA. To not do so would be to further entrench a failed process.</p> <p>(ix) The Review is incomplete. Comments from NRCan and OGS are currently outstanding and have not been evaluated in the Ministry Review. The review has taken over a year to conduct and should be complete at this time of public comment. The comments from NRCan and OGS are particularly pertinent given the stated concerns surrounding seismicity and associated effects on the plastic Leda Clay at the Site. An opportunity to review and comment upon these delayed portions for the MOECC Review of the CRRRC is requested.(CRCCPE)</p>	<p>(vii) See response (vi) above.</p> <p>(viii) Mr. Wallach has provided several submissions on seismic matters throughout the course of the EA on behalf of the CRCCPE. These have been provided to the proponent and to NRCan/OGS for review and comment. All of this will be carefully considered by the Ministry and Minister prior to any decision on the proposed undertaking.</p> <p>(ix) Acknowledged. For MOECC disposition.</p>
<p>(i) The Golder supplemental report in response to CRCCPE seismic comments on the EA was dated June 2015 and surreptitiously placed on the proponent's website 4 months after the public comment period had actually ended in February 2015. This report was effectively buried in the body of the EA and appended to the end of Volume III after Appendix R. Curiously, there was indication under the "What's New" section of the proponent's website, dated January 2015, that the report had been subsequently placed there.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 2</p> <p>(i) Taggart Miller advised public commenters in over 1,000 direct emails to regularly monitor the project website for updates. It is not clear how Golder's response can be said to have been "surreptitiously placed" on the website. It was placed on the website after review by the MOECC.</p>

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Comment(s)	Proponent's Response
<p>(ii) As a registered stakeholder group on this project we were not notified by the proponent or the MOECC PO of the response to geoscientific review until Dec 2015. The other addenda were only found by carefully searching the proponent's website.</p>	<p>(ii) Taggart Miller had advised public commenters to regularly monitor the project website for updates. The other addenda are part of the EA and could have been easily located at any time by a simple review.</p>
<p>(i) The Ministry Review purpose is to determine whether the evaluation in the EA is sufficient to allow you to make a decision about the proposed undertaking. However, it is patently obvious that the EA fails to pass this most fundamental requirement. Comments such as "in general, Taggart Miller followed a logical and transparent decision making process"; "overall, the ministry is satisfied with Taggart Miller's decision making process"; "in general, technical experts concluded that there were no significant environmental impacts that could not be mitigated"; and, that Taggart Miller has apparently committed to addressing "concerns raised" that remain outstanding "through additional work that will be completed as part of future approval requirements" should all sound the alarm bells. Given the scale of the planned endeavor and the magnitude of the associated risks at play, how can vague illusions that the Ministry or technical experts are generally satisfied somehow be seen as acceptable? In addition, to suggest that further work may be undertaken to address outstanding concerns at this late stage is extraordinary. At the very least, this is an indictment of an insufficient EA and one that does not reasonably allow you to make a decision.</p> <p>(ii) Notwithstanding the likely requirement for ongoing reporting of the proponent's diversion initiatives how can the ministry say it is satisfied when clearly the proponent's commitment is subject to and conditional on the actions of others whom it has no control over? Moreover, how and why should any consideration/credit be given when the differing</p>	<p>Approximate Number of Times Comment Received Individuals: 4 Groups: 0</p> <p>(i) The EA was conducted in accordance with the approved TOR. The comments of the public and other reviewers have been carefully considered. The EA is not intended to answer definitively all technical questions about an undertaking. Rather, it is a higher level assessment intended in part to determine if the proposed undertaken is likely to be an approvable project at the next more technical level of approvals by MOECC and others. That said, for the key disciplines (eg. groundwater, air) the work was carried out at an Environmental Protection Act level of detail.</p> <p>(ii) Taggart Miller has incorporated a Waste Diversion Protocol in the EA, which it will be reporting on to MOECC during the Site operations. It is acknowledged that there are multiple factors that will determine the diversion performance of the CRRRC over time, some of which are out of Taggart Miller's control.</p>

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Comment(s)	Proponent's Response
<p>monetary tipping rates purportedly to be charged for dumping at this proposed Site would suggest that the market economic realities will continue to drive behavior to the lowest costs.</p> <p>(iii) Under hydrogeology and waste review the words “no significant impacts” would imply there are some environmental impacts and not none as inferred. What are these impacts and should they not be shared for evaluation and comment? When the Ministry experts say they were “satisfied” with the proponent’s responses-does that mean agree?</p> <p>(iv) While it is indicated the MTO is satisfied with supplemental addenda why is there no position expressed by the MOECC on this addenda?</p>	<p>(iii) Hydrogeology is assessed primarily against the MOECC Reasonable Use Guideline, which sets out allowable impacts to groundwater.</p> <p>(iv) The MTO is the GRT expert agency regarding traffic.</p>
<p>Did the MOECC formally confirm the capacity requirements of Ottawa and Eastern Ontario in the need assessment? Were dated planning documents used?</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 The Minister approved the proposed TOR including Supporting Document #1.</p>
<p>How can such an important issue be reviewed in two 6 week blocks [by the GRT] with any level of professional comfort. The period periods of the year in which these reviews occurred can certainly make one wonder as to the availability of qualified and authorized individuals to complete these assessments. Will the Minister receive an accounting of whom was involved and whether those individuals were authorized to provide an official response/position?</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 The MOECC has no reason to doubt the competency or authority of the members of the GRT.</p>
<p>(i) Why is the Site-vicinity study area limited to 500 m when residents and businesses within a 10km radius have provided comments in respect of the proposal, the TOR, and EA. Does this speak to a 1994 standard and guideline...Is it outdated, too narrow and restrictive in its consideration? Surely this calls into question the relevance of the standard under today’s environmental realities and custodial obligations.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 (i) The individual disciplines determined the appropriate study areas. They were not all limited to 500 metres.</p>

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Comment(s)	Proponent's Response
<p>How can it be concluded that an evaluation took into account the EAA's broad definition of the environment when it appears the study areas were contained by a 500 m zone? Clearly the outcome of the proponents' analysis of the social economic environmental factors supports this observation.</p> <p>(ii) Under the Cumulative effects assessment, it states: "Based on this analysis, the only areas of potentially significant cumulative effects are surface water quality, given the elevated existing concentrations of some parameters (iron and phosphorus) in surface water, and cumulative effects from traffic." Is this because of the narrow application of the socio economic requirement and analysis as a result of the 1994 Site-vicinity study area standard of 500m? Does the Ministry agree with the proponent that there are no cumulative effects that impact individuals outside of the 500 m zone?</p>	<p>(ii) No, that is not correct. The cumulative impact assessment considered projects and activities that had the potential to overlap in time and space with the CRRRC.</p>
<p>(i) The Ministry Review was not fully translated into French. This is believed to be negligence and constitutes a grave disrespect of Francophones.</p> <p>(ii) "The Ministry is satisfied that consultation was undertaken with the Francophone community in accordance with the TOR." That's false.</p>	<p>Approximate Number of Times Comment Received Individuals: 3 Groups: 1</p> <p>(i) This is not standard or historical practice to our knowledge. For MOECC disposition. It is noted in this regard that not a single person who attended any of the numerous public consultation events during the EA was unable to converse in English to our knowledge. French speaking staff at these events were seldom called on.</p> <p>(ii) No substantiation.</p>
<p>It is disconcerting that Ontario is in discussions with the rest of the country to install a carbon tax to spend on efforts to protect the environment, but then the province of Ontario is also helping Taggart Miller set up a toxic waste Site that will result in poisoning the land, water, the residents, livestock and wildlife in this and surrounding areas.</p>	<p>Approximate Number of Times Comment Received Individuals: 2 Groups: 0</p> <p>The EA was conducted in accordance with the TOR approved by the Minister.</p>

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Comment(s)	Proponent's Response
<p>Under Table 2, Comment #5. Has the MOE validated these statements in any manner and if so what study or report is available for viewing? It is my understanding the 5km zone has more to do with meeting a City of Ottawa zoning requirement in the event this proposal receives approval than what is being portrayed here. Perhaps the Minister as the custodian of the environment can provide the PVPP if the proponent refuses-after all the Minister is there to protect our environment and our rights.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 The PVP Plan was a voluntary proposal by Taggart Miller. The 5 kilometre zone was selected to recognize the suggestion of the City for the Waste Management Ottawa (Carp Road) landfill expansion (not adopted by that proponent).</p>
<p>An independent 3<sup>rd</sup> party (loyal to the communities) should perform daily monitoring of critical levels and annual monitoring of less critical levels. All components monitored need to be agreed to up front and disseminated to the public and subsequently reported to public on an annual basis. Furthermore, plant shutdowns must be instituted when certain critical levels are exceeded.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 There will be a community liaison committee that will in part receive reports on monitoring and any corrective actions. The community liaison committee and the MOECC will also receive an annual report on operation of the CRRRC.</p>
<p>Seriously consider the options offered by the Environmental Commissioner (re lack of progress in IC&amp;I waste diversion at the provincial level imposes very difficult decisions on municipal governments)</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 The CRRRC was conceived in part to help address the lack of IC&amp;I waste diversion.</p>
<p>The fact the Ministry has been working with Golder and the fact that a former Golder employee is in charge of this project raises several red flags.</p>	<p>Approximate Number of Times Comment Received Individuals: 4 Groups: 0 For MOECC disposition.</p>
<p>It is incumbent upon you to recognize that the risks associated with this proposal are intolerable and have been vastly ignored, misrepresented and over-simplified by the proponent. These risks simply cannot be accepted by the Ministry at the cost of the local communities.</p>	<p>Approximate Number of Times Comment Received Individuals: 6 Groups: 1 The EA was conducted in accordance with the approved TOR and has been reviewed by numerous members of the GRT.</p>
<p>Page 3: Environmental Assessment Process: Since paragraph 2 states "An EA determines, on the basis of the environmental effects, if an undertaking should proceed, and if so...", then paragraph 3 should be written to convey the possibility a</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 For MOECC disposition.</p>

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Comment(s)	Proponent's Response
proposal could be rejected, particularly adding this outcome to the list in sentence 1.	
Page 4: top: The date given is inconsistent with the date provided on page 2 for the submission of the EA report.	Approximate Number of Times Comment Received Individuals: 1 Groups: 0 Noted.
Page 5: Project Site and vicinity: "The Township of Cumberland" hasn't existed for a decade. This is a false statement regarding the location of the proposed industrial waste facility.	Approximate Number of Times Comment Received Individuals: 1 Groups: 0 This is correct. The Township is now part of the City of Ottawa.
<p>(i) Page 5: Last sentence: "...and parts of the Boundary Road Site are not currently zoned for the activities proposed...". Over 90% of the Site is not compatibly zoned for the proposed industrial waste project. The statement understates the truth and therefore is misleading.</p> <p>(ii) Contrary to what the proponent states, the CRRRC is not compatible with adjacent land uses including extensive tracts of productive crop land, protected forests, and the National Capital Greenbelt. The strip of commercial and industrial development along a portion of Boundary Road does not characterize land use throughout the Site area or on the other three sides of the proposed Site.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 1</p> <p>(i) Comment noted. Public comment #2 from the Ministry Review also discusses Site zoning.</p> <p>(ii) The CRRRC is bounded on one side by an existing industrial park, a soil handling operation and a proposed truck stop, and on another side by a 400 series highway. There is a vacant woodlot to the south and cropland to the east. This was all considered in the impact analysis.</p>
<p>(i) Page 5: Paragraph 2: The Site is occupied by a regenerated forest at least 30 years old. It is not vacant and has not been cropped or farmed during my lifetime, except for the North corner. The description of the adjacent property to the South of the proposal Site is false. That Site is fully treed and is designated as a "significant woodlot". The description of the area across the road due West of the Site neglects to mention the National Capital Region Greenbelt which abuts Boundary Road for several hundred metres.</p> <p>(ii) Page 15: Bottom paragraph: The CRRRC industrial waste project is not compatible with adjacent land uses including extensive tracts of productive crop land, protected forests,</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 1</p> <p>(i) The Site was historically largely farmed, which was mostly abandoned over time as documented in air photos from 1945 and 1964 on Map 4 within TSD #6. The woodlot to the south was noted in the EA, as was the NCC Greenbelt, which was assessed to the satisfaction of the NCC.</p> <p>(ii) See responses above.</p>

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Comment(s)	Proponent's Response
<p>and the National Capital Greenbelt. The strip of commercial and industrial development along a portion of Boundary Road does not typify land use throughout the Site area or on the other 3 sides of the proposal Site.</p>	
<p>Page 5: Bottom paragraph: The description of soils omits mention of sand layers and the high water table. The top metre or more of the entire Site is sand, and several buried layers of sand (up to a metre thick) are found in every core drilled on that Site. Furthermore, the water table is no more than 0.5 metres below the surface anywhere on the property, according to the EA report. Water moves easily through sand. To omit this detail is to mischaracterize a significant feature of the Site, leading to a misunderstanding of the risks posed by siting an unlined landfill on the Site.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      The high water table is recognized in the EA. Although not mentioned in the Ministry Review description of project Site and vicinity the commenter is incorrect regarding the characterization of buried sand layers. The EASR Volume III, Section 3.3.2 and the June 2016 report of Professor Locat on the Site surficial geology correctly also describe the typical 1 to 2 metre thick veneer of silty sand at the surface overlying the marine silty clay and a thin, near flat lying layer of sandy silt to silty sand, trace clay at a consistent depth of approximately 4 m to 6 m below ground surface.</p>
<p>Page 5: Bottom paragraph: "...water supply is generally provided by means of shallow dug wells that obtain their water primarily from the surficial silty sand layer". The reviewer Crossley is wrong, and contradicts his own statement later in his remarks. The dug water supply wells average 18 feet (6 metres) deep. These water wells tap into a buried sand layer, which exists on the subject property and extends off it into neighbouring properties. Wells in the surficial sand layer would be 5 feet deep at most – they don't exist. This error significantly impacts how risk should be assessed for the Site – it is not adequately protective of local groundwater to use a partial landfill liner in the surficial sand layer.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      Mr. Crossley did a thorough review of the hydrogeological component of the EA. The hydrogeologist for South Nation Conservation also reviewed the assessment. The dug well assessment demonstrated that water is not received in these wells via buried silty layers. It is understood that the wells are dug to the depth that they are (typically about 6 to 8 m) to enable adequate water storage in the well during dryer periods of the year. In essence they function as an underground cistern. The dug well assessment is described in Volume III of the EASR, Appendix M.</p>
<p>Page 6: Description of the Undertaking: Paragraph 2 after the bullets: The permeability of the "silty clay deposit" is not uniform, since the Site is underlain by clay banded with layers of sand. The Leda clay (which is not waterproof like Bentonite clay...) has lower permeability than the sand, and the sand is not accurately described as "low permeability".</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      See response above regarding the lack of layers of sand within the clay deposit present at the Site. Neither the EASR nor the Ministry Review has indicated that the silty clay deposit has a uniform permeability. The Ministry Review states that the Site has a "natural low permeability silty</p>

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Comment(s)	Proponent's Response
	<p>clay deposit”, which is correct. The hydraulic conductivity of the various soil units at the Site is summarized in Sections 7.2.3 and 7.2.4 of Volume III of the EASR.</p>
<p>Page 6: Description of the Undertaking: next paragraph: ROPEC has not agreed to accept all the leachate projected to be produced at the CRRRC project. In fact, they contest the proponent’s statement of guaranteed acceptance. The EA should therefore contain a complete description of the supplementary leachate management approaches that will be needed at the Site (including kilometres of force main construction or an on-Site waste-water treatment plant), and the studies detailing impacts of those activities on the environment. The failure of the Review to demand this, given the information the City of Ottawa has provided on this topic, and given the extended time during which this subject should have been resolved, means this EA should be rejected.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      The City has confirmed on several occasions, most recently at the Environment Committee meeting of May 2016 that ROPEC has significant unused treatment capacity. The only concern raised by City staff is a current limitation on the number of trucks ROPEC can receive between 8:30 AM and 3:30 PM. Staff were directed to work with Taggart Miller to resolve this issue prior to the 2025- 30 time frame when the 6 truck per day limit staff have currently set would be realized. Options include extending the hours at the truck receiving facility, alteration of that facility, use of an intermediate discharge point or possibly a force main.</p>
<p>Page 6: Description of the Undertaking: next paragraph: The extent of the leachate “pre-treatment” to be performed on Site, with the inclusion of boilers and chemical precipitation, may invoke oversight under the federal Fisheries Act for waste-water treatment plants.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      The leachate pre-treatment facility will not discharge to waters frequented by fish. The pre-treated leachate will be conveyed to ROPEC.</p>
<p>(i) Page 7: top: The list of contaminated soil activities is indistinct. There “may be” a surplus management area; there may be “up to 8” piles. How can the modeling for the contaminated soils components of the project be considered accurate when the components themselves are of unknown dimension and number? Volatile organic compounds from these contaminated soil piles can be expected to release atmospherically – this was ignored in the GHG modeling for the project.</p> <p>(ii) There is no request by the Ministry for a report on proposed methane gas emissions which contributes to GHGs.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 2 Groups: 0                      (i) The contaminated soil activities are clearly defined in detail in Volume IV, Appendix H of the EASR. The conceptual Site plan assumes up to 8 bio-piles. The Site will commence operation with 2 bio-piles. There is a designated surplus soil management area. The modelling was conducted considering the maximum contaminated soil processing rates and piles. The greenhouse gases assessed are those required by Ontario Regulation 452/09. GHG emissions from mobile equipment working in the soil area are included in the GHG assessment, including dump trucks, loaders and soil turners.</p>

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Comment(s)	Proponent's Response
<p>On page 100 in the table section of the EA the City of Ottawa states that methane should be included in the air quality monitoring program. The ministry states that it is satisfied the proponent shall meet the Ministries air quality guidelines. What are the guidelines? Are they out of date for where we stand today with the urgent need for GHG reduction?</p>	<p>(ii) Methane gas was assessed as part of the GHG assessment for this site. Methane is not included in the air monitoring program as the methane emissions from the landfill gas will be mostly captured and combusted in landfill gas engines or flare.</p>
<p>Page 8: both diagrams: The proponents only acquired part of their project Site on Boundary Road by purchasing land. The parcel of roughly 80 acres at the north end of their project Site was held as "optioned", meaning there was a contract in place with the land owner for the proponents to complete purchase of the land within a certain time-frame. The "option" expired in September 2015. As of this month, there is no new option nor have they purchased the property. Therefore, it is not clear what the Site plan for the CRRRC actually is. This uncertainty over the Site's size and lay-out means this EA should be rejected.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 All of the Boundary Road Site is either owned or under option by Taggart Miller and the options are in full force and effect.</p>
<p>(i) Page 12: third paragraph: The number of form letters – each of which was individually signed as a personal statement by a member of our community – should be reported here. There were over 1800. (ii) The reference to "form letters" as opposed to stakeholders or members of the public is concerning and offensive. How many form letters were received and does the Minister or the Review Team value their concerns less than other stakeholders?</p>	<p>Approximate Number of Times Comment Received Individuals: 2 Groups: 0 (i) Noted.  (ii) All input received is considered by MOECC.</p>
<p>Page 18: top: Amending procedures throw the entire EA into uncertainty. By continuing to include this "back door" concept, the validity of all the conclusions of the EA report could be questioned. This section should be removed, or else the entire EA report should be rejected. There is no good reason for any amending clause.</p>	<p>Approximate Number of Times Comment Received Individuals: 1 Groups: 0 Many approved EAs contain provisions for minor amendments in consultation with the MOECC. In any event the amending procedure was limited in consultation with the MOECC.</p>

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Comment(s)	Proponent's Response
<p>Page 19: top 2 paragraphs: None of the content here amounts to firm commitment to divert any waste. This section shouldn't satisfy the Ministry.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      The proponent has prepared a Waste Diversion Protocol referenced in the government review and available in the hard copies of the Ministry Reviews, by request from the MOECC or on the project website.</p>
<p>(i) Page 21: Air and odour management: Since one of the primary waste streams to be handled at the proposed Site is construction, wood wastes can reasonably be expected to be chipped frequently. The statement "...this activity would be infrequent and the impacts are not considered significant" is incongruous with the EA process. The point of studying the impact is to determine if it is significant. The refusal to study the impact of this prescribed waste handling activity is unacceptable.</p> <p>(ii) Our village is downwind from the dump Site. Comment #98 says: "Odour frequency analysis is not expressly required and has not been included in the submission." How can this be reasonable.</p>	<p>Approximate Number of Times Comment Received                      Individuals: 10 Groups: 0                      (i) The particulate emissions from the wood grinding and chopping operations were considered to be insignificant. Wood grinding will only occur periodically, and the frequency will depend on the rate and amount of material received. The material to be chipped and ground will have relatively high moisture content and is expected to result in negligible particulate emissions in any event. Given the moisture content of the material, the relatively small processing capacity of the chipper and grinder (estimated at 1 metric tonne per hour), the infrequent nature of the operation and the location on Site, particulate emissions from this source in the Air Quality Assessment were not considered and in any case would not alter the outcome of the assessment.                      (ii) The odour assessment was conducted in accordance with the Methodology for Modelling Assessments of Contaminants with 10-minute Average Standards and Guidelines (MOECC, 2008). As per the guidance, frequency analysis is only required when an exceedance is modeled at the receptors. As the modeled results demonstrated compliance at the receptors, no frequency analysis was required.</p>
<p>Page 23: Monitoring: This statement "...EA did not identify an adverse effects to any of the environmental components addressed." Conflicts directly with the statement on page 24 "...the EA...provides a description of the mitigation and monitoring measures to address the potential negative environmental effects of the proposed undertaking."</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0                      Adverse effect is what remains after the application of mitigation measures, typically assessed against a MOECC standard.</p>
<p>The last sentence also seems to be odds with the zone coverage of Ottawa and Eastern Ontario – the zone appears</p>	<p>Approximate Number of Times Comment Received                      Individuals: 1 Groups: 0</p>

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<b>Comment(s)</b>	<b>Proponent's Response</b>
to have broadened – which is it? Having a blemish in my backyard for Ottawa is one thing, for Ottawa and Eastern Ontario another, and Ontario another. While this may be all as a result of poor structure and wording...	The proposed service area for the CRRRC is clearly set out in the EA and is limited to Ottawa and a portion of Eastern Ontario.