



Environment and Climate Change
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Ms. Robyn-Lynne Virtue
Panel Manager
Deep Geologic Repository Project
Canadian Environmental Assessment Agency
160 Elgin Street, 22nd Floor
Place Bell Canada
Ottawa, Ontario K1A 0H3

Dr. Ms. Virtue,

RE: Technical Review of Ontario Power Generation's Response to the Information Request Package of April 5, 2017 from the Canadian Environmental Assessment Agency - Deep Geologic Repository for Low and Intermediate-Level Radioactive Waste Project

Environment and Climate Change Canada (ECCC) has reviewed Ontario Power Generation's (OPG's) Response to the Information Request Package of April 5, 2017 from the Canadian Environmental Assessment Agency.

The ECCC review focused on the technical validity of the responses to the CEA Agency's Information Requests, and specifically on those aspects of the OPG response that are related to our mandate, including water quality and quantity, air quality, migratory birds, species at risk, and ecological risk assessment.

While we do not propose a subsequent information request, we do have comments related to potential effects to the terrestrial environment related to IRs 1.2 and 1.14. The information provided by OPG allows for a broad comparative assessment based on generalities about the different terrestrial environments at the three locations (i.e. Bruce Nuclear site, Sedimentary alternate location and Crystalline alternate location). ECCC recognizes that there is considerable variation in the terrestrial environment within each of these geographic areas. The wide range of possible site conditions and environmental features within each of the Sedimentary and Crystalline locations does not allow for a definitive comparison of potential effects amongst the three locations. Precise siting locations are required before a definitive comparison of the significance of effects upon wildlife and wildlife habitat can be made, particularly in regards to species at risk and migratory birds.

In terms of the broad scale comparison, there is a higher probability that the Sedimentary location will contain a wider variety of sensitive, rare, and ecologically significant habitats and many species at risk, as compared to the Crystalline location. Due to the existing fragmented habitat in the Sedimentary location, relatively small losses of the high quality habitat found in the Sedimentary location would likely be of greater consequence than the larger losses of habitat described for the Crystalline location. The loss of a larger block of habitat within a contiguous habitat at the Crystalline location may not necessarily result in more adverse effects as compared to the Sedimentary location. Furthermore, avoidance of habitat may not be possible in the Sedimentary location, as evidenced by the fact that there will be some habitat loss at the proposed Bruce location which is a heavily industrialized site. If habitat loss is unavoidable at the

Sedimentary location, the ecological significance of those effects may be greater than described by OPG in Table 6.1, and comparatively greater than the Crystalline location.

We trust that the above provides you with the necessary context and advice. If you have any questions regarding these comments, please contact me at <contact information removed> or rob.dobos@canada.ca, or Sandro Leonardelli at <contact information removed> or sandro.leonardelli@canada.ca.

Yours sincerely,
<Original signed by>

Rob Dobos
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