



January 19, 2022

Mr. Brian Wilcox
Director – Reactor Decommissioning
Canadian Nuclear Laboratories (CNL)

Subject: Outcome of CNSC Staff’s Completeness Check of the December 17, 2021 Revised Draft Environmental Impact Statement Submission and Responses to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project

Dear Mr. Wilcox,

On December 17, 2021 Canadian Nuclear Laboratories’ (CNL) submitted a revised draft Environmental Impact Statement (EIS) and revised responses to federal and provincial Information Requests (IRs) for the proposed Nuclear Power Demonstration (NPD) Closure Project [1]. CNSC staff have conducted a completeness check of this submission to form a conclusion on whether the required information has been provided in order to proceed with the EIS technical review.

Overall Review

The scope of the completeness check was to evaluate this submission [1] against CNSC staff’s detailed feedback from the previous completeness check [2]. In particular, CNSC staff reviewed the revised responses to the 7 Information Requests (IRs) that did not pass the earlier completeness check, including any relevant revisions to the revised EIS and supporting technical documents.

CNSC staff acknowledge that CNL has put effort into engagement with identified Indigenous Nations and communities as well as addressing the comments received from a number of the identified Indigenous Nations and communities on the Project Description (PD) and on versions of the draft EIS. CNSC staff reviewed CNL’s Indigenous engagement as documented in the revised draft EIS submission in accordance with the requirements and related guidance of CEAA 2012, the *Generic Guidelines Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012* (Generic Guidelines), and CNSC REGDOC 3.2.2: *Indigenous Engagement*. Pursuant to these, it is incumbent upon the proponent to carry out activities in the following areas:

- undertake meaningful and targeted engagement with Indigenous Nations and communities to clearly identify and summarize their issues and concerns related to the Project
- engage on how to specifically address or mitigate the identified issues and concerns



- document how engagement activities resulted in meaningful changes to the EIS and EA process, where applicable

All of this must be summarized directly within the EIS and captured in the Indigenous Engagement Report (IER), though more detail should also be provided in appendices or supporting documents. Where engagement was not possible or issues could not be resolved, documentation to support such cases must be well documented.

Upon performing the completeness verification, CNSC staff determined that CNL's submission is incomplete in the areas identified above and therefore there is insufficient information to proceed to the technical review.

Throughout the EA process, and in particular since the outcome of the January 2021 completeness check, CNSC staff have met with CNL to provide additional guidance and clarification regarding CNSC staff's expectations. CNSC staff also provided CNL with written guidance, specific clarifications and examples on a number of occasions (see Annex 1).

Information Requests (IRs)

Four (4) of the seven (7) responses to IRs do not include sufficient documented information to allow for a technical review. Detailed review feedback on the specific responses to IRs that were deemed incomplete is provided in the attached table (Annex 2).

The response to IR#154 does not provide a clear and direct answer to the question posed. CNL's response does not clarify whether or not information and feedback from Indigenous Nations and communities described in the response was considered when developing the spatial boundaries for the revised draft EIS nor does it indicate whether the spatial boundaries changed based on this information/feedback gathered.

The responses to IRs #155-157 do not present a clear demonstration of whether or what engagement CNL has conducted specific to the topic in each information request (IR), namely potential impacts to Aboriginal land and resource use valued components, the renaturalization process, and the potential impacts to First Nation and Métis fishing rights during institutional and post-institutional controls phases of the project. Further, the responses to IRs #155-157 are not stand-alone, rather the reader is referred to Appendix C of the revised draft EIS, containing the Record of Engagement and Tables of Interests and Concerns without pointing specifically to the information which underpins the response. As previously communicated to CNL on a number of occasions, it is CNSC staff's expectation that responses must respond clearly and fully to the IR without a reviewer having to search for, select and evaluate the information themselves.

Indigenous Engagement and Issues and Concerns Tracking and Reporting

CNL is required to identify and consistently implement an appropriate method and format for tracking, summarizing, and reporting key issues and concerns raised by Indigenous Nations and communities. The format chosen and the information provided must be easy to follow such that



reviewers are able to find the required information. Both the Generic Guidelines and examples of tracking tables were provided as guidance by CNSC (see Annex 1).

As outlined in CNSC staff's previous correspondence [1, 2] outlining the outcome of the two prior completeness checks, CNSC staff provided detailed feedback that for each identified Indigenous Nation and community, CNL should clearly demonstrate that they responded to issues, concerns and/or feedback raised, and validated their responses with the respective Indigenous Nations and communities. This information should similarly be included in the draft EIS and Indigenous Engagement Report (IER). CNSC staff provided feedback that, should CNL not be able to fully address issues, concerns or feedback raised, these cases be well documented.

Regardless of the format and method that CNL selects, CNSC staff expect CNL to provide a summary of the aspects of the project of concern to Indigenous Nations and communities and why they are important in terms of effects under section 5(1) (c) of CEAA 2012 and/or impacts to Indigenous and/or treaty rights.

Upon review, CNSC staff found that four (4) of the seven (7) “Key Interests and Concerns Tables” in Appendix C of the revised draft EIS [1], disaggregated by Indigenous Nation and community, contain insufficient information to proceed to a technical review.

More specifically, tables C2, C4, C6, C8 do not contain adequate information for CNSC staff to determine the key interests and concerns of the Indigenous Nations and communities. In addition, the information provided (in these tables) is insufficient for CNSC staff to draw linkages between the key interests and concerns, clear responses to these by CNL, and any resulting change or impact on the draft EIS as a result of these responses.

Detailed review feedback on the “Key Interests and Concerns Tables” provided that were deemed incomplete is provided in the attached table (Annex 3).

Next Steps

CNSC staff expect CNL to perform any additional work, revise the submission and re-submit the draft EIS, responses to IRs, and any supporting documents that may have changed as a result of the revisions. CNSC staff is willing to hold a meeting with CNL to further elaborate on the outcome of this particular completeness check, and the expectations for a resubmission.

Upon resubmission of an EA package, CNSC staff will perform a subsequent completeness check. Should the EIS submission be deemed complete at that time, the technical review will commence.

Should you have any questions, please do not hesitate to contact the EA specialist for the NPD Closure Project, Marcelle Phaneuf, directly by phone at 343-551-4196 or by email at Marcelle.Phaneuf@cnsccsn.gc.ca.



Sincerely,

NKwamena

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Annex 1: List of Guidance and Examples Provided by CNSC Staff to CNL

Annex 2: Detailed Completeness Check of Revised Draft EIS and Responses to Information Requirements for Nuclear Power Demonstration Closure Project

Annex 3: Detailed Completeness Check of Interests and Concerns Tables for Nuclear Powers Demonstration Closure Project

References:

- [1] Letter, K. Schruder (CNL) to N. Kwamena (CNSC), *Re-Submission of Revised Environmental Impact Statement for the Nuclear Power Demonstration Closure Project*, December 17, 2021 ([e-Doc 6703866](#))
- [2] Letter, N. Kwamena (CNSC) to B. Wilcox (CNL), *Outcome of CNSC Staff Completeness Check of the Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project*, January 15, 2021 (e-Doc 6464837)
- [3] Letter, C. Cianci (CNSC) to B. Wilcox (CNL), *CNSC Staff Completeness Check of the Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project*, May 05, 2020 (e-Doc 6290679)



Annex 1. List of Guidance and Examples Provided by CNSC Staff to CNL

Guidance:

- [*Generic Guidelines for the Preparation of an Environmental Impact Statement – Pursuant to the Canadian Environmental Assessment Act, 2012*](#)
- Letter, CNSC to CNL, [*CNSC Staff Completeness Check of Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project*](#), May 05, 2020 (e-Doc 6290679)
- Letter, CNSC to CNL, [*Outcome of CNSC Staff Completeness Check of the Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project*](#), January 15, 2021 (e-Doc 6464837)
- Guidance on Indigenous Engagement for CNL Nuclear Power Demonstration (NPD) Closure Project, January 22, 2021 (e-Doc 6467843)

Examples:

- [*Final Environmental Impact Statement for the Near Surface Disposal Facility Project*](#)
- [*Hardrock Gold Mine Project – Final Environmental Impact Statement*](#)



**Annex 2. Detailed Completeness Check of Revised Draft EIS and Responses to Information Requirements
for Nuclear Power Demonstration Closure Project (Submitted December 17, 2021)**

Reference #	Complete	Rationale	Context and Information Required for a Complete Response
153	Yes		
154	No	The information provided is insufficient to allow a technical review	<p>Context:</p> <p>Below is the feedback CNSC staff provided in the CNSC’s January 15, 2021 letter to CNL on the Outcome of the CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions:</p> <p><i>“The response does not answer the requirement 1-3 in Annex 1 of the CNSC’s January 15, 2021 letter to CNL on the Outcome of the CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions. For MNO and all other identified Indigenous groups validation of the use of information including from the MNO TKLUS was not complete in Appendix H of the IER. In addition, the response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, explained what information CNL was requesting from the identified Indigenous groups or validated the information with the Indigenous groups. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please provide a complete list of resources and resources used to validate. Please also demonstrate validation and verification was completed. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.”</i></p> <p>Outcome of the Completeness check of December 17, 2021 submission:</p> <p>The response provided by CNL does not clearly and directly answer the question posed. While the response does include a list of sources of Indigenous groups’ Aboriginal Traditional Knowledge Studies, it does not state whether or not this information was considered when developing the draft EIS’ spatial boundaries nor does it indicate whether the spatial</p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p>boundaries changed based on this information. Stating that Indigenous groups use different spatial boundaries is not the equivalent to demonstrating consideration of such.</p> <p>Further, the response provided by CNL does not provide evidence or information to support that validation work was completed with Indigenous groups with respect to how the CNL considered the Aboriginal Traditional Knowledge in determining the spatial boundaries.</p> <p>Information required for a Complete Response:</p> <p>CNL is to revise the response to IR #154, and provide further evidence and information to support that Indigenous groups' Aboriginal Traditional Knowledge (including the Métis Nation of Ontario) was considered when developing the draft EIS' spatial boundaries and validation work was completed with Indigenous groups. CNL should also demonstrate how the EIS was updated based on conclusions of this work, if updates were required. If needed, CNL should provide a rationale where information was not obtained for some of the identified Indigenous groups.</p>
155	No	The information provided is insufficient to allow a technical review	<p>Context:</p> <p>Below is the feedback CNSC staff provided in the CNSC's January 15, 2021 letter to CNL on the Outcome of the CNSC Staff's Completeness Check of the Revised Environmental Impact Statement and Dispositions:</p> <p><i>"The response does not answer the requirement 1 and 2 in Annex 1 of the CNSC's January 15, 2021 letter to CNL on the Outcome of the CNSC Staff's Completeness Check of the Revised Environmental Impact Statement and Dispositions.</i></p> <p><i>In reviewing Appendix B and Appendix H of the IER as directed in the response, it is not clear to CNSC staff whether CNL presented information related to effects to fishing, sought specific feedback, responded to any feedback and validated this with identified Indigenous groups. For example, Appendix B of the IER TSD lists the engagement opportunities but not their outcome. Moreover, Appendix H of the IER TSD states for many of the identified Indigenous groups including but not exclusive to MNO, AOPFN, AOO and AANTC that responses to concerns and validation thereof is pending. In addition, the response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, or explained what information CNL was requesting from the identified</i></p>



			<p><i>Indigenous groups with respect to the effects to Aboriginal land and resource use and mitigation measures. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please include sufficient information so as to demonstrate that CNL has provided information regarding the effects to Aboriginal land and resource use and mitigation measures, discussed, received feedback, responded to and validated the concerns of identified Indigenous groups regarding the project. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.”</i></p> <p><u>Outcome of the Completeness check of December 17, 2021 submission:</u></p> <p>The response must respond clearly and fully to the Information Request without a reviewer having to search for, select and evaluate information themselves.</p> <p>The response to IR#155 does not present a clear demonstration of what engagement was done specific to mitigation measures for potential impacts on Aboriginal Land and Resource Use VCs both in the EIS and Appendices. Listing mitigation measures in the response does not equal to engaging with Indigenous groups on the mitigation measures for potential impacts on these VCs as requested in the original Information Request and follow up correspondence of May 05, 2020 and January 15, 2021.</p> <p>While the response to IR#155 refers to Appendix C of the EIS, containing the Record of Engagement and Tables of Interests and Concerns, without going into detail, it does not clearly show whether or how CNL has engaged specifically on mitigation measures on these VCs for any of the Indigenous groups.</p> <p>The Record of Engagement lists engagement activities undertaken but does not detail the content, topics or outcomes thereof. Therefore, the combination of the absence of direction from the response to IR#155 as to which record to consider with a paucity of detail within the records themselves results in an inability to demonstrate whether the information request has been met.</p> <p><u>Information required for a Complete Response:</u></p> <p>CNL is to revise the response to IR #155 to demonstrate that CNL has engaged with each of the Identified Indigenous groups specifically on the effects to Aboriginal land and resource use and mitigation measures. This engagement should include: presenting information regarding effects to Aboriginal land and resource use and mitigation measures, seeking specific feedback, responding to any feedback and validating this with identified</p>
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Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p>Indigenous groups. If needed, CNL should provide a rationale where information was not obtained for some of the identified Indigenous groups.</p>
156	No	<p>The information provided is insufficient to allow a technical review</p>	<p>Context:</p> <p>Below is the feedback CNSC staff provided in the CNSC’s January 15, 2021 letter to CNL on the Outcome of the CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions:</p> <p><i>“The response does not answer the requirement 1 and 2 in Annex 1 of the CNSC’s January 15, 2021 letter to CNL on the Outcome of the CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions. Appendix B of the IER does not provide enough detail to demonstrate that information was provided, concerns discussed, responded provided by CNL and validated with Indigenous groups. The response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, explained what information CNL was requesting from the identified Indigenous groups with respect to the re-naturalization process and next land use of the NPD site. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please demonstrate that CNL has presented this information, solicited feedback from identified Indigenous groups, responded to any comments or concerns and validated these responses with identified Indigenous groups related to the re-naturalization process and next land use of the NPD site. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.”</i></p> <p>Outcome of the Completeness check of December 17, 2021 submission:</p> <p>The response must respond clearly and fully to the Information Request without a reviewer having to search for, select and evaluate information themselves.</p> <p>The response to IR#156 provided by CNL suggests that work on CNL plans for site restoration and decommissioning are ongoing and therefore engagement with identified Indigenous groups is still ongoing. In addition, the response notes that some engagement activities with Identified Indigenous groups may have taken place. However, CNL refers to the entire body of the record of engagement (Appendix C). The Record of Engagement lists engagement activities undertaken but does not detail the content, topics or outcomes thereof. Therefore, the combination of the absence of direction from the response to IR#156 as to which record</p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p>to consider with a paucity of detail within the records themselves results in an inability to demonstrate specific engagement on the topic of the re-naturalization process of the NPD site.</p> <p>Information required for a Complete Response:</p> <p>CNL is to revise the response to IR #156 and include sufficient information to demonstrate that CNL has engaged with each of the Identified Indigenous groups specifically on the re-naturalization process and future land use of the NPD site. The engagement should include: presenting information regarding the re-naturalization process and future use, seeking specific feedback, responding to any feedback and validating this with identified Indigenous groups. If needed, CNL should provide a rationale where information was not obtained for some of the identified Indigenous groups.</p>
157	No	The information provided is insufficient to allow a technical review	<p>Context:</p> <p>Below is the feedback CNSC staff provided in the CNSC’s January 15, 2021 letter to CNL on the Outcome of the CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions:</p> <p><i>“The response does not answer the requirement 1-3 in Annex 1 of the CNSC’s January 15, 2021 letter to CNL on the Outcome of the CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions. For MNO and all other identified Indigenous groups validation of the use of information including from the MNO TKLUS was not complete in Appendix H of the IER. In addition, the response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, explained what information CNL was requesting from the identified Indigenous groups or validated the information with the Indigenous groups. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please provide a complete list of resources and resources used to validate. Please also demonstrate validation and verification</i></p>



			<p><i>was completed. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.”</i></p> <p><u>Outcome of the Completeness check of December 17, 2021 submission:</u></p> <p>The response must respond clearly and fully to the Information Request without a reviewer having to search for, select and evaluate information themselves.</p> <p>As requested in the first part of the response to IR #157, the response provided by CNL does include a discussion on the potential impacts to First Nation and Metis fishing rights that could potentially occur during the Institutional Controls and Post-Institutional Controls phases.</p> <p>However, the second part of the response to IR# 157 remains incompletely responded to.</p> <p>The response to IR#157 does not present a clear demonstration of what engagement was done specific to mitigation of the potential impacts to First Nation and Metis fishing rights that could potentially occur during the Institutional Controls and Post-Institutional Controls phases. Listing general engagement activities and mitigation measures in the response does not equal to engaging with Indigenous groups specifically on the mitigation measures for potential impacts to fishing rights as requested in the original Information Request and follow up correspondence of May 05, 2020 and January 15, 2021.</p> <p>Appendix C of the EIS, containing the Record of Engagement and Tables of Interests and Concerns, does not clearly show that CNL has engaged specifically on mitigation measures for potential impacts to fishing rights for any of the identified Indigenous groups.</p> <p>The Record of Engagement lists engagement activities undertaken but does not detail the content, topics or outcomes thereof. Therefore, the combination of the absence of direction from the response to IR#157 as to which record to consider with a paucity of detail within the records themselves results in an inability to demonstrate whether the information request has been met.</p> <p><u>Information required for a Complete Response:</u></p> <p>CNL is to revise the response to IR #157, and include sufficient information to demonstrate that CNL has engaged with each of the identified Indigenous groups specifically on impacts of the project on fishing rights. The engagement should include: presenting information regarding impacts to Indigenous fishing activities, seeking specific feedback, responding to any feedback and validating this with identified Indigenous groups. If needed, provide a</p>
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Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			rationale where information was not obtained for some of the identified Indigenous groups.
159	Yes	n/a	
164	Yes	n/a	

**Annex 3: Detailed Completeness Check of Interests and Concerns Tables
for Nuclear Power Demonstration Closure Project**

It is CNL’s responsibility to select an approach or format for presenting information regarding interests and concerns. Should CNL choose to present the information regarding interests and concerns in a format other than the tables presented in Appendix C of the revised draft EIS submitted on December 17, 2021, CNL should nonetheless consider the review notes presented hereunder.

The Completeness Check comments below apply to the “Key Interests and Concerns Tables” in Appendix C as presented in the submission for completeness check on December 17, 2021. Should CNL choose to continue using the current tabular format, staff’s expectation is that CNL will take note and amend the tables accordingly.

Completeness check outcome: some “Key Interests and Concerns Tables” in Appendix C, disaggregated by Indigenous group, contain insufficient information to proceed to a technical review.

INCOMPLETE

- Table C-2 Algonquins of Ontario (AOO) Key Interests and Concerns
- Table C-4 Algonquins of Pikwakanagan First Nation (AOPFN) Interests and Concerns
- Table C-6 Metis Nation of Ontario (MNO) Key Interests and Concerns
- Table C-8 Algonquin Anishinabeg Nation Tribal Council (AANTC) Key Interests and Concerns

COMPLETE but needing revisions

- Table C-21 Williams Treaties First Nations (WTFN) Interests and Concerns

COMPLETE

- Table C-10 Kebaowek First Nation (KFN) Interests and Concerns
- Table C-12 Kitigan Zibi Anishinabeg First Nation (KZA) Interests and Concerns

INCOMPLETE	
Tables C-2, C-4, C-6, C-8	AOO, AOPFN, MNO, AANTC Key Interests and Concerns
Column	Completeness check
Column 2 “Key Interests and Concerns”	This column does not contain adequate information in order for CNSC staff to determine what the <u>key</u> interests and concerns of the Indigenous Nations and communities are. <i>Inter alia</i> , references to specific single comments by the Indigenous Nations and communities are not appropriate, nor reflective of overall concerns.

	<p>In addition, the information provided in this column cannot be directly related to columns 3 and 4 of the table. Therefore, CNSC staff analysis of CNL’s response to (addressing of) interests and concerns, and of the impact on the draft EIS as a result of those responses cannot be performed by CNSC staff.</p> <p>CNSC staff recommend that CNL revise the information in column 2 for each of Tables C-2, C-4, C-6, C-8 to clearly identify the key interests and concerns expressed by each Indigenous Nation and community about the NPD project as a whole. CNL is also to obtain validation of these interests and concerns from the Nations and communities prior to resubmission. (See also next comment)</p>
<p>Column 3 “How CNL is addressing the interest/concern”</p>	<p>The information in this column refers to dispositions to comments and actions taken (e.g. letters, communications, meetings) but does not provide information on “how” each of the specific interests/concerns of the Indigenous Nations and communities (which should have been clearly identified in column 2) are specifically addressed.</p> <p>Based on the information available in these tables, CNSC staff cannot perform an analysis of CNL’s response to each key interest or concern. (See also next comment)</p> <p>CNSC staff recommend that CNL revise the information in column 3 for each of Tables C-2, C-4, C-6, C-8 to demonstrate how CNL has addressed (or responded to) the concern. (See also next comment)</p>
<p>Column 4 “Impact on the EIS”</p>	<p>There are insufficient linkages between the information in this column, the key interests and concerns expressed by the Indigenous Nations and communities which should have been made clear in column 2, and how CNL would have addressed these key concerns in column 3.</p> <p>Based on the information in this table, CNSC staff cannot perform an analysis of the impact on the draft EIS as a result of CNL’s response to (addressing of) the interests and concerns.</p> <p>CNSC staff recommend that CNL revise the information in column 4 for each of Tables C-2, C-4, C-6, C-8 to indicate whether or how the draft EIS was amended as a consequence of CNL addressing the interests and concerns expressed by the Indigenous Nations and communities.</p>

Column 5 "Status of this Concern and Next Steps"	Complete
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COMPLETE but needing revisions	
Table C-21 WTFN Interests and Concerns	
Column	Completeness check
Column 2 "Key Interests and Concerns"	Complete
Column 3 "How CNL is addressing the interest/concern"	<p>The information in this column lists actions taken (e.g. letters, meetings) and provides some information on how specific interests/concerns of the WTFN are addressed.</p> <p>However, the issue with determining completeness is where more than one interest and concern is listed per cell in column 2, it is unclear that a full response to each has been provided by CNL.</p> <p>As noted in the comment below, there may also be additional relevant information in column 4 that is better suited to reinforce CNL's addressing of interests and concerns in column 3.</p> <p>CNSC recommends that CNL rearrange and revise the information in columns 3 and 4 to reinforce and fill out CNL's responses to all interests and concerns in column 3, and the impact to the draft EIS in column 4, and ensure that the linkage between the three columns is clear.</p>
Column 4 "Impact on the EIS"	<p>This column includes information that should better constitute part of column 3, CNL's addressing of interests and concerns. Column 4 should be limited to indicating how the draft EIS has been amended as a result of CNL's response to those concerns.</p> <p>In addition, where amendments to the draft EIS have been made, CNL should verify that it is clearly indicated to which interest or concern this amendment relates.</p> <p>CNSC recommends that CNL rearrange and revise the information in columns 3 and 4 to reinforce and fill out CNL's responses to key interests and concerns in column 3, and the impact to the draft</p>

	EIS in column 4, and ensure that the linkage between the three columns is clear.
Column 5 "Status of this Concern and Next Steps"	Complete

COMPLETE	
Table C-10, C-12 KFN and KZA Interests and Concerns	
Column	Completeness check
Column 2 "Key Interests and Concerns"	Complete
Column 3 "How CNL is addressing the interest/concern"	Complete
Column 4 "Impact on the EIS"	Complete
Column 5 "Status of this Concern and Next Steps"	Complete