



May 24, 2013

Joint Review Panel
Deep Geologic Repository for Low and
Intermediate Level Radioactive Waste
Case Reference Number 17520
Debra Myles, Panel Co-Manager
c/o Canadian Environmental Assessment Agency
160 Elgin Street, 22nd Floor
Ottawa ON K1A 0H3
Canada

Dear Joint Review Panel:

The Great Lakes and St. Lawrence Cities Initiative (Cities Initiative) is an organization of mayors and other local elected leaders from over 100 cities in Canada and the United States working together to advance the protection, restoration, and long term sustainability of the world's largest source of surface fresh water, the Great Lakes and St. Lawrence. The economic well-being and quality of life for the 16 million citizens of these communities as well as for all Canadians and Americans is a key goal. By making its own cities more sustainable and addressing issues that have implications for the resource, the organization seeks to lead by example and encourage others to do the same. It is for this reason that the Cities Initiative provides these comments on the deep geologic repository (DGR) proposed by Ontario Power Generation (OPG) for the long term storage of low and intermediate level radioactive waste at the Bruce Power nuclear generating station site in Kincardine, Ontario.

The Cities Initiative appreciates the cooperativeness of OPG in arranging a fact finding site visit to the proposed facility for several members of the organization. All of the right people from OPG and others from the National Waste Management Organization were there and all questions were answered in a very forthright manner. In addition, written material was provided in advance and during the tour to further inform the participants. The Cities Initiative learned a great deal more about the project and is in a better position to provide comments.

Timing for Comments

The Cities Initiative is concerned that the public comment period on the Environmental Impact Statement (EIS) for the proposed DGR is being closed on May 24 after only 30 days' notice. We recognize that the comment period has been open for a much longer time, but with the magnitude and complexity of materials accumulated in the record of this proceeding, more

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advance notice of the end of the comment period should have been given. The Cities Initiative is a small organization with limited resources with a large membership spread from the western end of Lake Superior to the Gulf of St. Lawrence. It is very difficult to review the materials and communicate with the membership in the time provided. We fully intend to participate as interveners in the public hearing, but request an additional 60 days for providing comments on the EIS.

Community and Stakeholder Outreach

The Great Lakes and St. Lawrence region is a unique community bound together by the fresh water treasure of the world. This region is thinking and acting more like an integrated social, environmental, and economic cohesive unit all the time. The history of this goes back many years, starting with the Boundary Waters Treaty of 1909, and has been reinforced more recently by the Great Lakes Water Quality Agreement of 1972 (amended in 2012), and the Great Lakes and St. Lawrence Water Resources Management Agreement and Compact of 2008. Many organizations like the Great Lakes Fishery Commission, the Great Lakes Commission, the Council of Great Lakes Governors, the Council of Great Lakes Industries, and the Cities Initiative have extensive Canadian and U.S. involvement and reinforce the idea of thinking and acting like an integrated region.

This point is important because the DGR is something that has significant implications for the entire region. OPG has obviously done extensive outreach in the Kincardine and Bruce County area, and has reached out to elected officials and others in Michigan, but the area of interest is really much larger. Because of the large supply of surface fresh water, the Great Lakes and St. Lawrence region has attracted a great deal of electrical generating capacity over the years. This includes traditional coal fired plants, as well as nuclear generating stations and hydropower dams. Now wind farms are seen in many places around the region, as well. This generating capacity has been a real advantage to the area, but some costs have come with it. One of the significant concerns for some time has been what to do with all the low, intermediate, and high level radioactive waste that has accumulated over the years. OPG is to be commended for stepping forward to find a more permanent solution to managing the waste in the long term. At the same time, recognizing the regional nature of the issue, there has not been enough outreach to the broader Great Lakes and St. Lawrence region on the DGR project and that needs to be done before the EIS and licensing process moves forward.

Site Selection

From the record and what we have learned by visiting the proposed site of the DGR, it is our understanding that the municipality of Kincardine originally approached OPG about being a

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host for the radioactive waste and the DGR. It is fully understandable why the municipality would be receptive given the long term relationship with the company and the nuclear plant, and recognizing the economic significance of the plant and the DGR to the community and all of Bruce County. Obviously, community acceptance of the project is exceedingly important. It is our understanding that no other site was considered. Recognizing the significance of the issue and the size of Ontario, it does not seem appropriate to limit potential sites to just one location and potential solutions just to DGR. As good as the geology for the site and the engineering for the DGR might be, it is hard to believe that there might not be more appropriate sites elsewhere.

Perhaps of greatest concern is the close proximity of the site one kilometer from the shore of Lake Huron, or to any of the Great Lakes or St. Lawrence. When dealing with a resource as valuable as the fresh water here, why take the risk of putting the site so close to the shore. Whatever the geology might be in the location, it just seems to make much more sense to have the site as far away as possible from such a major source of fresh water.

Conclusion

The Cities Initiative greatly appreciates the efforts OPG has put forth to help inform representatives of the organization on the DGR project, and recognizes all the work that has gone into the proposal. However, the limited time to review the record and prepare comments, the limited outreach to the broader Great Lakes and St. Lawrence community, and the consideration of only one site that is one kilometer from Lake Huron leads us to conclude that the project should not move forward at this time.

Sincerely,

Tom Barrett, Chair
Great Lakes and St. Lawrence Cities Initiative
Mayor of Milwaukee