



Memorandum

August 10, 2022

To	Dave Rushton/Catherine Simpson, Municipality of South Bruce		
From	Greg Ferraro and Ian Dobrindt/AD/mma	Tel	+1 519 884 0510
Subject	Recreational Resources Study (S13) Draft Final Report GHD Leadership Team Technical Peer Review Comments	Project no.	11224152-MEM-31

1. Introduction

This memo provides GHD Leadership Team's peer review comments on the Effects on Recreational Resources Study (S13) Draft Final Report (Draft Final Report) prepared by Tract Consulting (Tract) on July 22, 2022 for your consideration. The Effects on Recreational Resources Study is one of the 24 socio-economic community studies aimed at helping the South Bruce community make informed decisions about the Nuclear Waste Management Organization (NWMO) Project and the potential positive and negative impacts and benefits of locating the repository and associated facilities within the Municipality of South Bruce (South Bruce). Since the Recreational Resources Study is being led solely by South Bruce through its retained consultants, the peer review it is not subject to the formal peer review protocol that was developed to support a collaborative approach between NWMO and South Bruce for all NWMO led and joint NWMO/South Bruce led community studies.

Notwithstanding this, South Bruce requested that the GHD Leadership Team (Greg Ferraro and Ian Dobrindt) carry out a technical peer review of all municipally led community studies reflecting the approach and intent of the peer review protocol to maintain the same level of reporting consistency and reliability across all 24 socio-economic community studies regardless of the author.

It is noted that the NWMO led and joint NWMO/South Bruce led community studies are to be carried out in accordance with a corresponding Work Plan that was peer reviewed while the South Bruce led studies are guided by a Statement of Work (SoW). It is understood the SoW is to be referenced in creating the South Bruce led study and includes an engagement plan, a detailed work plan, and a project timeline. The SoW confirms the study scope and tracks progress towards the achievement of deliverables including project sequencing and staging of tasks, key decision points, completion date of the study deliverables and the roles and responsibilities of both South Bruce and the retained consultant.

2. Technical Peer Review Approach

The technical peer review of the Draft Final Report was carried out by the GHD Leadership Team guided by the peer review protocol developed between NWMO and South Bruce. The technical peer review of the South Bruce led study involved the following sequential activities:

- Review the Draft Final Report having the following questions in mind:
 - Has the SoW been complied with?
 - Has the overall objective of the community study as articulated in the SoW been met?
 - Are the findings and recommendations sound, traceable, and understandable based on the methodology including data collection, analysis, and synthesis?
 - Has the most current available pertinent information from the NWMO Project and other on-going socio-economic community studies been utilized?
- Provide our preliminary comments to South Bruce and Tract via a reviewed version of the Draft Report for their initial consideration
- Hold a meeting with South Bruce to discuss the preliminary comments and proposed changes to the Draft Report
- Finalize the peer review comments and proposed changes documenting them in a formal memo for submission to South Bruce and Tract for their consideration in finalizing the Draft Final Report

3. Technical Peer Review Comments

South Bruce and Tract were provided preliminary or initial peer review comments in the reviewed version of the Draft Report on June 29, 2022. A meeting was then held on that same day with South Bruce to review the initial comments. The initial peer review comments and observations were both substantive and non-substantive. The non-substantive comments were editorial in nature including definitions, references, clarifications, consistency of terminology, calculations, etc. The non-substantive comments have been addressed by Tract as part of finalizing the Draft Final Report. **Table 3.1** summarizes the substantive comments provided on June 29, 2022 as well as the status of those comments following the PRT's review of the finalized Draft Final Report on July 22, 2022.

As per **Table 3.1**, the PRT has concluded that all the comments provided have been satisfactorily addressed in the Draft Final Report except for one, which has only been partially addressed. The partially outstanding comment is related how the Effects on Recreation Resources Study informs the applicable Guiding Principles.

Table 3.1 *Effects on Recreational Resources Study Comment Disposition Table*

Comment number	Report section reference	Technical Peer Review Comments – June 29, 2022	Technical Peer Review Comments – July 22, 2022
1	1	Suggest that Step 2 be revised to include “identify potential future demand” be based on the metroeconomics South Bruce and Area Growth Expectations Report (2022).	Although Step 2 remains unchanged because its existing description matches the Statement of Work (SOW), we note that the Study uses the population growth targets stated in the in South Bruce and Area Growth Expectations Report (metro economics, 2022) and assumes that these targets will be realized.
2	1	Clarify the Peer Review Approach as it relates to municipally led community studies, which is applicable to this Study.	Comment satisfactorily addressed.
3	1	Describe how this Study specifically informs the four applicable guiding principles vs just listing them.	A new Section 6 has been included specifically describing how the applicable guiding principles are informed through this Study. However, the PRT notes Guiding Principles #6, #10, and 29 are mentioned, but not Guiding Principle #32. Therefore, we recommend that Section 6 be updated to account for Guiding Principle #32 because the Effects on Recreation Resources Study informs Guiding Principle #32 by proposing strategies to ensure sufficient recreational facilities to accommodate expected population growth associated with hosting the Project in South Bruce. Comment partially addressed.
4	4	Clarify if the number of MSB residents who participated in ice hockey per week of 470 people is both youth and adult leagues.	Comment satisfactorily addressed.
5	4	Consider revising the “Additional Considerations” sub-section to account for the possibility that the on-going condition and life expectancy assessment of the community centres and arenas determine that the existing community centres should be replaced. This would have implications on the recommended Feasibility and Operational Plan’s timing.	Comment satisfactorily addressed.
6	4	Recommend that the “Existing and Projected Level of Service Compared to NRPA Benchmark” table be included for Community Centres for consistency with the other Assessment sub-sections.	Comment satisfactorily addressed.
7	4	Consider revising the “Effects” section for Theatres so that the strategy is to “monitor the situation and note a trigger to initiate an appropriate action”.	Comment satisfactorily addressed.

Comment number	Report section reference	Technical Peer Review Comments – June 29, 2022	Technical Peer Review Comments – July 22, 2022
8	4	Should the recommendation of replacing one of MSB’s existing pools with a “modern outdoor facility” be revised to “a modern indoor facility”, which would provide for 12 months of use?	No revision required based on Tract’s response that the operation costs of an indoor pool facility are prohibitive, especially with municipal populations of less than 10,000. Additionally, Hanover provides a regional indoor pool facility.
9	4	Confirm some of the numbers provided in the “Existing and Projected Level of Service Compared to NRPA Benchmark” table for Parks because there seem to be missing information and errors.	Comment satisfactorily addressed.
10	4	Cannot it be determined now as part of the Dent Plan of Subdivision process if a playground will be included within the development or not versus making an assumption that one will be provided in calculating walking distances in Mildmay?	No revision required based on Tract’s response that It cannot be determined at this point because there are no development plans presently.
11	4	Does not the NPRA benchmarking indicate that a third tennis court is needed now in the municipality (2021) and the situation will only be exacerbated with the NWMO Project?	The Strategies have been revised to account for this comment, so no further revisions are required.
12	4	Consider revising the Timelines for the Teeswater River Access because of its long duration (2028-2088).	Comment satisfactorily addressed.
13	4	Confirm if the Strategies of adding one multi-court in each of Mildmay, Teeswater and Formosa is correct based on the conclusion stating two additional multi-courts are needed.	The strategies have been clarified to satisfactorily address the comment.
14	5	Suggest that an introduction to Section 5 be provided so that the reviewer has a better context for understanding the information being conveyed by the Implementation Plan. For example, is the Implementation Plan based solely on population growth vs an existing need now because of underservice? Is the Implementation Plan being driven by baseline population growth or by the impact of the NWMO Project or both?	Introductory text has been added to satisfactorily address the comment.
15	5	Suggest that the Implementation Plan table be revised to include the actual applicable strategy corresponding to the Report section so it is clearer to the reviewer and therefore, does not need to look back at the section for what exactly is being proposed. Also, it would be beneficial in the Report and specifically within the Implementation Table that for those strategies proposing additional/upgraded facilities/programs the driver be identified (e.g., base case vs because of the NWMO Project (impact case)).	Additional information provided including “Base Case” and “Impact Case” to satisfactorily address the comment.

4. Municipality of South Bruce’s Guiding Principles

The Effects on Recreational Resources Study informs four of the 36 guiding principles associated with it, which were established by MSB. The Municipality published a Project Visioning report based on community workshops held in January 2020 that identified areas of community concern and opportunities. Based on the Project Visioning report and further public consultation, MSB passed a Council resolution endorsing the 36 principles that will guide their assessment of willingness to host the Project. In light of their importance to MSB, the principles have been individually linked to each of the studies as appropriate to ensure that they were fully considered or accounted for in completing the work (**Attachment 1**).

Four of the 36 principles are linked to the Effects on Recreational Resources Study: numbers 6, 10, 29, and 32. **Table 4.1** lists the four principles and how the Effects on Recreational Resources Study informs those principles.

Table 4.1 The Principles Associated with the Effects on Recreational Resources Study

Principle # and Description	Consideration of the Principle in the Study
6. The NWMO will minimize the footprint of the repository’s surface facilities to the extent it is possible to do so and ensure that public access to the Teeswater River is maintained, subject to meeting regulatory requirements for the repository.	The Effects on Recreational Resources Study informs Guiding Principle # 6 by proposing a walking trail/access through the Project site along Teeswater River if regulations allow and suggesting that NWMO can be funding partner in developing the trail system.
10. The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks.	The Effects on Recreational Resources Study informs Guiding Principle # 10 by identifying potential positive and negative socio-economic impacts of the Project on South Bruce from a recreation facilities and programs’ perspective. The Study proposes strategies that will result in community benefits and will contribute to mitigating potential negative socio-economic impacts or risks of the Project on South Bruce (e.g., NWMO can partner with the Municipality in the enhancement of program spaces, including renovations for Community Centres, etc.).
29. The NWMO will prepare an infrastructure strategy that addresses any municipal infrastructure requirements for the Project and will commit to providing appropriate funding for any required upgrades to municipal infrastructure required to host the Project in South Bruce.	The Effects on Recreational Resources Study informs Guiding Principle # 29 by proposing strategies that include upgrades/expansions to existing facilities and new recreational facilities (e.g., a new Mildmay Library, in partnership with NWMO and Bruce County Public Libraries is recommended, etc.), which can inform municipal infrastructure requirements if appropriate. In these cases, anticipated timelines and estimated costs are provided for funding considerations by NWMO in consultation with the Municipality.
32. The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.	The Effects on Recreational Resources Study informs Guiding Principle # 32 by proposing strategies to ensure sufficient recreational facilities are provided to accommodate expected population growth associated with hosting the Project in South Bruce.

5. Peer Review

The PRT is of the view that the Effects on Recreational Resources Study satisfies its overall Statement of Work objective by describing the additional demand that new residents will place on the recreational resources in the

community, including ice rinks, playing fields, libraries and other resources, and identifying any potential need for expansion of the existing facilities or the development of new facilities. The Effect on Recreational Resources Study assesses 16 indoor and outdoor facility types including seasonal, year around, passive, and active for all residents of South Bruce (e.g., ice arenas, community centres, theatres, trails, splash pads, pumptracks, etc.).

In each case, existing and projected level of service conditions in South Bruce are provided within the context of benchmarking, where possible. The use of benchmarking is very useful for understanding if there is a current or future deficiency in the Municipality. Information from the recent South Bruce Recreation Master Plan completed by Tract is also shared for each facility type, where possible. So, again, additional context that is current is provided for the reviewer's understanding. Finally, the Study identifies the anticipated effects on the facility type, proposes strategies for mitigating those effects including their associated timelines and estimated costs.

This critically important information is summarized in Section 5 as part of an Implementation Plan. The Implementation Plan basically acts as a "quick reference guide" or "road map" for carrying out the proposed strategies for recreational facilities and programs in South Bruce, which NWMO and the Municipality can refer to as part of potential future discussions.

The PRT is satisfied that all peer review comments have been substantially addressed within the final report. To this end, we encourage the Municipality to internalize the proposed strategies specific to South Bruce regardless of the outcome of potential discussions with NWMO and capitalize on this Community Study's findings to the greater benefit of their residents.

Attachments

Attachment 1

36 Guiding Principles

South Bruce Guiding Principles for NWMO's Site Selection Process

The Nuclear Waste Management Organization (NWMO) is seeking an informed and willing host for a deep geologic repository (DGR) to safely store Canada's used nuclear fuel, and a Centre for Expertise. To guide its work, South Bruce held a comprehensive visioning process in 2019 and 2020 to get input on what people cared about most in relation to the Project. The process, in addition to other community input and feedback resulted in the creation of 36 Guiding Principles which focus on safety for people and the environment, ensuring the Project brings meaningful benefits to the community, and ensuring the municipality has a voice in decision-making.


The principles were adopted by Council resolution and they have guided municipal activities and engagement related to the Project. South Bruce is seeking NWMO commitments on how it would meet or address these 36 expectations and aspirations for the Project. This is a key step in determining whether the Project is right for the community and will help people make an informed decision when a public referendum is held to measure willingness to be a host community.

Safety and the Natural Environment



1. The NWMO must demonstrate to the satisfaction of the Municipality that the Project will be subject to the highest standards of safety across its lifespan of construction, operation and into the distant future.
2. The NWMO must demonstrate to the satisfaction of the Municipality that sufficient measures will be in place to ensure the natural environment will be protected, including the community's precious waters, land and air, throughout the Project's lifespan of construction, operation and into the distant future.
3. The NWMO must demonstrate to the satisfaction of the Municipality that used nuclear fuel can be safely and securely transported to the repository site.
4. The NWMO will ensure that the repository site will not host any nuclear waste generated by other countries.
5. The NWMO must commit to implementing the Project in a manner consistent with the unique natural and agricultural character of the community of South Bruce.
6. The NWMO will minimize the footprint of the repository's surface facilities to the extent it is possible to do so and ensure that public access to the Teeswater River is maintained, subject to meeting regulatory requirements for the repository.
7. The NWMO must commit to preparing construction management and operation plans that detail the measures the NWMO will implement to mitigate the impacts of construction and operation of the Project.

People, Community and Culture

8. The NWMO must demonstrate to the satisfaction of the Municipality that it has built broad support for the Project within the community of South Bruce.
 9. The Municipality will, in collaboration with community members, develop and establish an open and transparent process that will allow the community to express its level of willingness to host the Project.
 10. The NWMO will identify the potential for any positive and negative socio-economic impacts of the Project on South Bruce and surrounding communities and what community benefits it will contribute to mitigate any potential risks.
 11. The NWMO, in consultation with the Municipality, will establish a property value protection program to compensate property owners in the event that property values are adversely affected by the NWMO's site selection process and the development, construction and/or operation of the Project.
 12. The NWMO, in consultation with the Municipality, will establish a program to mitigate losses to business owners in the event that their business is adversely affected by the NWMO's site selection process and the development, construction and/or operation of the Project.
 13. The NWMO, in partnership with the Municipality, will develop a strategy and fund a program to promote the agriculture of South Bruce and the surrounding communities.
 14. The NWMO, in partnership with the Municipality, will develop a strategy and fund a program to promote tourism in South Bruce and the surrounding communities.
 15. The NWMO, in partnership with the Municipality, will commit to implement programs to engage with and provide opportunities for youth in the community, including investments in education and the provision of scholarships, bursaries and other incentives for youth to remain in or return to the community.
 16. The NWMO will implement the Project in a manner that promotes diversity, equality and inclusion.
 17. The Municipality recognizes the important historic and contemporary roles Indigenous peoples have and continue to play in the stewardship of the lands we all call home and will, in the spirit of Reconciliation, work with the NWMO and local Indigenous peoples to build mutually respectful relationships regarding the Project.
 18. The NWMO will commit to relocate the working location of a majority of its employees to South Bruce as soon as it is reasonably practicable to do so after the completion of the site selection process.
 19. The NWMO will, in consultation with the Municipality, establish a Centre of Expertise at a location within South Bruce to be developed in conjunction with the Project.
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Economics and Finance

20. The NWMO, in consultation with the Municipality, will commit to implementing a local employment and training strategy with the objective of ensuring that the majority of employees for the Project are located within South Bruce and surrounding communities.
21. The NWMO, in consultation with the Municipality, will commit to implementing a business opportunities strategy that will provide opportunities for qualified local businesses to secure agreements that support the Project and that requires the NWMO to take all reasonable steps to create opportunities for qualified local businesses to benefit from the Project.
22. The NWMO will commit to implementing a procurement strategy for the Project that gives preference to the selection of suppliers who can demonstrate economic benefit to South Bruce and surrounding communities.
23. The NWMO will enter into an agreement with the Municipality providing for community benefit payments to the Municipality.
24. The NWMO will cover the costs incurred by the Municipality in assessing community well-being and willingness to host the Project.
25. The NWMO will fund the engagement of subject matter experts by the Municipality to undertake peer reviews of Project reports and independent assessments of the Project's potential impacts on and benefits for the community as determined necessary by the Municipality.
26. The NWMO agrees to cover the costs of the Municipality's preparation for and participation in the Project's regulatory approval processes, including the Canadian Nuclear Safety Commission's licencing process and the assessment of the Project under the Impact Assessment Act (or other similar legislation), that are not otherwise covered by available participant funding.
27. The NWMO will fund the Municipality's preparation of a housing plan to ensure that the residents of South Bruce have access to a sufficient supply of safe, secure, affordable and well-maintained homes.
28. The NWMO will prepare a review of the existing emergency services in South Bruce and provide appropriate funding for any additional emergency services required to host the Project in South Bruce.
29. The NWMO will prepare an infrastructure strategy that addresses any municipal infrastructure requirements for the Project and will commit to providing appropriate funding for any required upgrades to municipal infrastructure required to host the Project in South Bruce.

Capacity Building

24. The NWMO will cover the costs incurred by the Municipality in assessing community well-being and willingness to host the Project.
25. The NWMO will fund the engagement of subject matter experts by the Municipality to undertake peer reviews of Project reports and independent assessments of the Project's potential impacts on and benefits for the community as determined necessary by the Municipality.
30. The NWMO will prepare a review of the existing and projected capacity of South Bruce's road network and will commit to providing appropriate funding for any required upgrades to the road network.
31. The NWMO will enter into a road use agreement with the Municipality that identifies approved transportation routes during construction and operation of the Project and ensures proper funding for maintenance and repair of municipal roads and bridges used for the Project.

Capacity Building (continued)

32. The NWMO, in consultation with the Municipality and other local and regional partners, will prepare a strategy to ensure there are sufficient community services and amenities, including health, child-care, educational and recreational facilities, to accommodate the expected population growth associated with hosting the Project in South Bruce.
33. The NWMO will comply with the Municipal Official Plan and zoning by-law and seek amendments to the Official Plan and zoning by-law as necessary to implement the Project.

Regional Benefits

36. The NWMO must demonstrate to the satisfaction of the Municipality that the Project will benefit the broader region outside of the community of South Bruce, including local Indigenous communities.




Governance and Community Engagement

34. The NWMO will provide the Municipality with an ongoing and active role in the governance of the Project during the construction and operation phases of the Project.
35. The NWMO will continue to engage with community members and key stakeholders to gather input on community vision, expectations and principles, including concerns, related to the Project.

Reach out anytime with your questions, comments, concerns, or if you are seeking more information. We would be happy to hear from you!

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