Ministry of the Environment, Conservation and Parks

Ministry Review of the City of Sault Ste. Marie Solid Waste Management Environmental Assessment

October 23, 2026

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Ministry Review of the City of Sault Ste. Marie Solid Waste Management Environmental Assessment

Environmental Assessment Act

R.S.O. 1990, Subsection 17.11(1)

This Ministry Review is subject to the provisions of Ontario Regulation 616/98, which sets out a deadline for the completion of this document. This paragraph and the giving of the Notice of Completion are the notices required by subsection 17.12(2) of the *Environmental Assessment Act*.

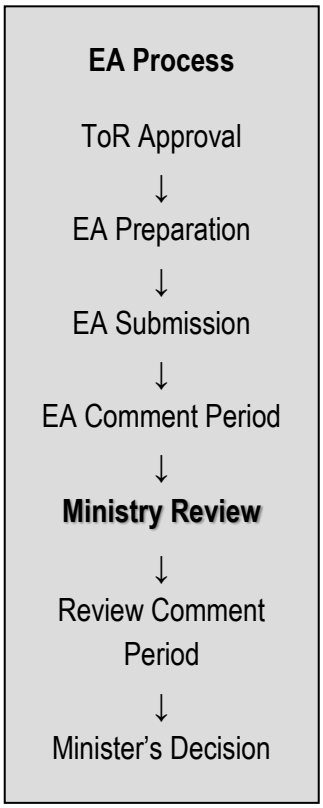
This Ministry Review documents the ministry's evaluation of the City of Sault Ste. Marie Solid Waste Management Environmental Assessment and takes the comments received by Indigenous communities, government agencies, and members of the public into consideration.

Executive Summary

Who	City of Sault Ste. Marie (City)
What	The City is proposing to add 3.17 million cubic metres (m^3) of solid non-hazardous residential, industrial, commercial and institutional, construction and demolition waste, and biosolids waste disposal capacity at the Sault Ste. Marie Landfill. The preferred alternative is a north and west horizontal expansion. The current service area for the site includes the City of Sault Ste. Marie, Prince Township and Batchewana First Nation's Rankin Reserve. There is no change proposed to the service area.
When	The Environmental Assessment (EA) was submitted on January 12, 2024. An amended EA was submitted on August 14, 2025.
Where	402 Fifth Line East, Sault Ste. Marie, Ontario
Why	The Sault Ste. Marie Landfill is estimated to approach its approved capacity of 2.26 million m^3 by 2029. The proposed additional capacity would extend the life of the landfill to 2049.
Conclusions	The EA was prepared in accordance with the approved Terms of Reference (ToR) and contains information necessary to assess the potential environmental effects of the proposed project. The EA demonstrates that the City will be able to meet its primary objective of providing a long-term solution for residual waste disposal set out in its ToR. The ministry is proposing conditions be imposed, if approved, to support implementation of the project in accordance with the EA.

1. Environmental Assessment Process

The *Environmental Assessment Act* (EAA) sets out a proponent-driven planning process designed to incorporate the consideration of the environment into decision-making by assessing the effects of a proposed project on the environment. In Ontario, the EAA sets out the general requirements for the preparation of an EA, as well as the Ministry of the Environment, Conservation and Parks' (MECP/ministry) evaluation process. For those proponents and projects subject to the EAA, the requirements of the EAA must be met before the project can proceed.



Proponents are required to address the potential effects of the preferred project on the natural, social, cultural and economic environments for the protection, conservation and wise management of the environment. The EA helps decision-makers to determine, on the basis of the environmental effects, if a project should proceed, and if so, how the potential environmental effects can be managed.

EAs may identify a problem or opportunity, consider alternative ways of addressing the problem or opportunity, evaluate the environmental effects of the alternatives and select a preferred project from the alternatives. The proponent must consider actions to avoid, reduce and mitigate potential environmental effects. In preparing the EA, the proponent completes various studies and consults with Indigenous communities, government agencies, and the public to evaluate the alternatives and determine the preferred project. If the project is approved, the proponent is required to monitor the implementation of the project to demonstrate compliance with standards, regulations and conditions of the EAA approval.

1.1 Terms of Reference

Completing the EA process involves two separate steps – the ToR and the EA. The first step requires the proponent to prepare and submit a ToR to the ministry for review and decision by the Minister of the Environment, Conservation and Parks (Minister). On September 26, 2005, the former Minister approved the City's ToR.

The ToR established the framework for the preparation of the EA, including a description of the purpose and rationale for the project, which was to provide additional

waste disposal capacity; identification of potential environmental effects, both positive and negative; and a consultation plan for obtaining input from Indigenous communities, government agencies and the public. Using this framework, the proponent assessed the alternative ways of providing additional waste disposal capacity and alternative methods of implementing the preferred alternative.

1.2 Environmental Assessment

After receiving the Minister's approval on the ToR, the City proceeded to prepare an EA for the proposed project, in accordance with the approved ToR and the requirements of the EAA. A draft EA was made available to the public, Indigenous communities and the Government Review Team (GRT) for review between May 24 and July 7, 2017. The City circulated the draft EA to Indigenous communities and the GRT for review prior to the final submission, providing these groups with an opportunity to review the document and offer comments. This approach allowed the proponent to address early feedback before submitting the final EA to the ministry and before formal review timelines were triggered.

On January 12, 2024, the City submitted its Sault Ste. Marie Solid Waste Management EA to the ministry for review and approval. The EA was available for review and comment until March 1, 2024. The GRT, comprised of provincial ministries and agencies, reviewed the EA to verify that the information and conclusions in the EA were accurate based on respective mandates. Batchewana First Nation was the only Indigenous community to submit comments on the EA during the 7-week comment period. The City amended the EA several times in response to these comments and re-submitted the final version to the ministry in August 2025.

All comments sent to the ministry are considered by the Minister before a decision is made on the project. The Minister's decision is subject to the approval of the Lieutenant Governor in Council.

1.3 Ministry Review

The EAA requires the ministry to prepare a review of the EA, known as the Ministry Review. The Ministry Review sets out the ministry's evaluation of the EA, including whether the EA has been prepared in accordance with the approved ToR and meets the requirements of the EAA, and whether the evaluation in the EA is sufficient to allow the Minister to decide whether to approve the proposed project.

The Ministry Review comment period provides an opportunity for the GRT, the public and Indigenous communities to see how their concerns with the EA and the proposed project have been considered. Refer to Section 5 of this review for Next Steps.

2. The Proposed Project

2.1 Background

The landfill is located at 402 Fifth Line East in Sault Ste. Marie, Ontario (see Figure 1). The landfill is situated on 151 hectares (ha) of City-owned land with a 25.8 ha fill area and a current approved waste disposal capacity of 2.26 million m^3. The landfill currently accepts solid non-hazardous residential, industrial, commercial and institutional, construction and demolition waste, and biosolids waste generated by the City, Prince Township and Batchewana First Nation's Rankin Reserve.

The landfill has been operating and accepting waste since the early 1960s. The landfill operates under Environmental Compliance Approval (ECA) No. A560102, initially issued on March 2, 1989. Since 1989, the ECA has been amended several times, including to permit the creation of a 23.2 ha contaminant attenuation zone adjacent to the western boundary. The City has also acquired nearby properties over time to expand the size of the overall site, in response to the ministry identifying concerns regarding groundwater quality along the western boundary.

The existing landfill is estimated to reach its capacity in January 2029 based on the site's 5-year average disposal rate. However, the demolition of a local hospital will potentially shorten the remaining landfill capacity by approximately 2.5 years to mid-2027.

2.2 Purpose and Description of the Proposed Project

The current approved rate of fill at the landfill is 58,000 tonnes per year. The City is proposing an expansion which will provide an additional 3.17 million m^3 of capacity until 2049, which includes existing and anticipated diversion activities associated with the site. The expansion is expected to meet the anticipated waste disposal needs for the existing service area of the City, Prince Township and Batchewana First Nation's Rankin Reserve.

Proposed expansion

The proposed expansion would be a north and west horizontal expansion over the existing 151 ha landfill footprint. Landfill mining is proposed within the western portion of the existing site to facilitate the construction of a liner. The mining process involves excavating waste within the existing disposal footprint, removing small particle waste

and recyclables, transferring the residual waste to a new lined cell and lining the mined area to accommodate future waste disposal. The proposed expanded landfill will be located within existing City-owned lands and will include a liner, a leachate collection system, a stormwater management system and a landfill gas collection system.

Anticipated waste disposal needs

Population projections are used with waste disposal rates to forecast the quantity of waste to be managed by the City in the future. It is anticipated that the permanent population in the service area will increase from an estimated 77,601 in 2026 to 94,487 by 2049. Over a 10-year period from 2010 to 2019, the annual waste received at the site ranged from approximately 55,000 to 108,000 tonnes and the amount of waste landfilled annually ranged from approximately 38,000 to 63,000 tonnes. The landfilled waste continues to be in this range. Waste received at the site undergoes sorting and diversion, reducing the quantity of waste that ends up in the landfill.

The City has identified the following waste disposal projections based on its expected future population growth:

- Rate of residential waste generation = 450 kilograms/person/year
- Residential waste diversion range = 30% to 50%
- Industrial, Commercial and Institutional waste disposal – post diversion = 600 kilograms/person/year
- Municipal biosolids generation rate = 135 kilograms/person/year
- All municipal biosolids will be diverted commencing 2027

As such, the City has proposed that the landfill expansion be designed to dispose of 1.78 million tonnes of waste by 2049, with an increase in the annual maximum fill rate to 76,000 tonnes per year.

Landfill site design

The expansion will be implemented through a horizontal expansion, which will increase the fill area from 25.8 ha to 43.6 ha, for a net increase of 17.8 ha. The proposed mining area of 3.4 ha is located within the existing 25.8 ha fill area. The height will remain unchanged from the existing landfill, having a minimum of 10 m and a maximum of 32 m above the surrounding grades. The proposed expanded landfill area will accommodate 1,777,000 tonnes of waste, while the combined existing and proposed expansion area will have a waste and daily cover capacity of 3,170,000 m^3, extending waste disposal capacity until 2049. The landfill will be designed with a maximum 6:1 above ground side slope. The design will have a final cover depth of 1 m with a waste to daily cover ratio of 4:1. The 4:1 ratio is a common standard for landfill operations and means that

for every 4 cubic yards of compacted waste, 1 cubic yard of soil cover is used to cover it daily. The design will also include a composite liner membrane for the new landfill cells and the mined cell, known as Cell 1A. The proposed site will be set back a minimum of 30 m from the property boundary. Please refer to Figure 2 for a depiction of the proposed expansion.

The existing landfill site is designed to collect leachate and landfill gas. Leachate is collected at the south, east and west sides of the site via collection pipes and purge wells. The leachate is then pumped to the City's sanitary sewer system for treatment at the West End Water Pollution Control Plant. The site's landfill gas collection through the site's vertical extraction wells and flaring system has been operational since 2011. The system burns collected landfill gas in a central enclosed flare and was designed to be expanded as necessary. The collected gas may be used for energy generation in the future.

The proposed landfill project includes the following main components:

- Seven new landfill cells (Cells 1 to 7)
- A landfill mining operation for Cell 1A
- An enhanced liner and leachate collection system
- Expansion of the existing landfill gas collection system, and continuation of landfill gas flaring
- Decommissioning and replacing purge wells as needed
- Three stormwater management ponds serving the landfill leachate runoff which have been designed to accommodate runoff from 1:100 year storm events
- Two pump stations and water mains
- Relocation of existing public drop off, maintenance garage, scale house/ administration building and scales
- Construction of a new recycling centre and household hazardous waste depot

2.3 Summary of potential environmental effects and mitigation measures

The EA describes the existing environment that may be impacted by the project as well as the potential project effects, including net and cumulative effects. A range of environmental components was assessed, including the natural, social, cultural and economic environments. The EA contains a full description of effects in section 7.0 Potential Net Effects, including subsections for each environmental component and subsections for cumulative effects and climate change. Additional information on these environmental components can be found in accompanying technical appendices.

The Project's recommended mitigation measures are also discussed in section 7.0 along with future commitments for the site in section 8.0. These mitigation and monitoring commitments are intended to prevent or reduce the potential negative effects to the environment during construction, operation, closure and post-closure activities associated with the proposed project.

A summary of key potential environmental effects and mitigation measures, as stated in the EA, are provided below:

Potential biological effects: Impacts on vegetation and wildlife will primarily result from vegetation clearing and habitat loss associated with site preparation and construction and some potential disturbance from noise during operation.

Mitigation measures:

- Monitoring to confirm that erosion and sediment control measures operate effectively to protect adjacent vegetation communities, wildlife habitat, and to confirm that protected natural areas are not impacted.
- Minimize impacts to wildlife and woodland habitats through forest edge setbacks and protection measures, retention of existing trees and vegetation within natural features, season vegetation clearing restrictions, arborist monitoring, and environmental awareness training.

Potential hydrological effects: The existing site has a leachate management system without a liner. During its review of the draft EA the ministry identified concerns regarding groundwater quality along the western boundary of the site.

Mitigation measures:

- A proposed landfill expansion design that addresses mitigation of groundwater impacts, with landfill mining of the site's western portion and the addition of a liner and leachate collection system for the new fill area.
- Sampling and analysis for private wells within close proximity to the site will be undertaken.
- The City has held discussions with property owners adjacent to the western property boundary to extend the site contaminant attenuation zone further west.
- The City has acquired eight properties adjacent to the landfill site to enhance its buffer lands.

Potential social effects: Property owners noted concerns related to odour, noise, traffic, and litter.

Mitigation measures:

- Land acquisition through expropriation was initiated by the City to enhance buffer lands to the southwest of the proposed fill area.
- Community outreach to keep area residents informed of the City's construction schedule, activities and planned mitigation.
- Development of an odour management plan to mitigate the proposed landfill mining activities.
- Construction of a liner and leachate collection system at the site for all new and mined cells.
- Expansion of the landfill gas collection system and construction of a biosolids management facility.
- No changes to hours of operation or operational practices are being proposed that would significantly increase noise.

Potential visual effects: The landfill expansion is visible from Fifth Line East and requires the removal of approximately 6.5 ha of existing woodlot.

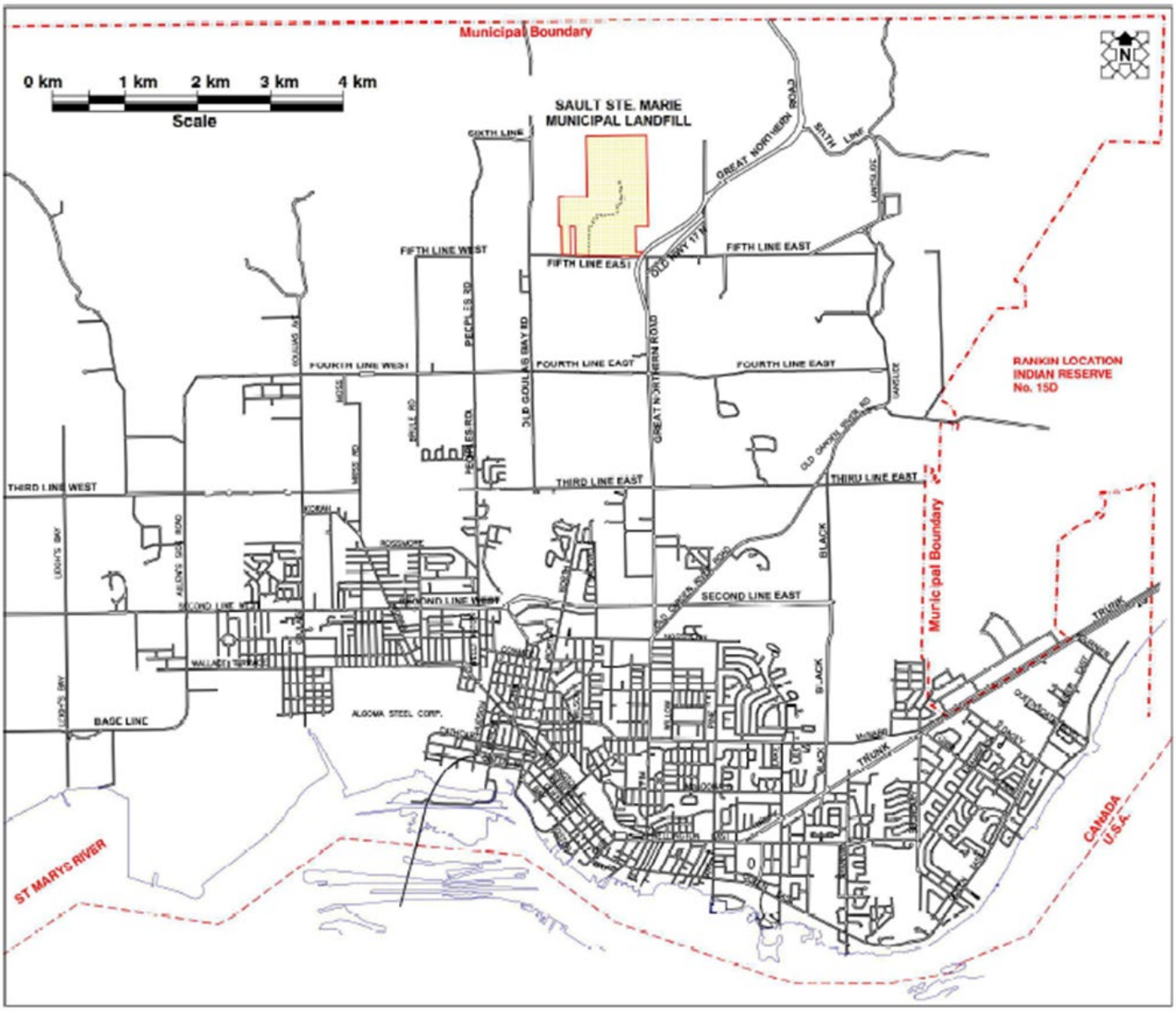
Mitigation measures

- The introduction of vegetation treatments at strategic locations to screen landfill views from the road right-of way, reforestation plots, incorporating similar species to compensate for the loss of existing vegetation.

The City concluded in the EA that the net effects are acceptable, based on an assessment against all of the criteria and with the application of mitigation measures.

Figure 1: Project Location

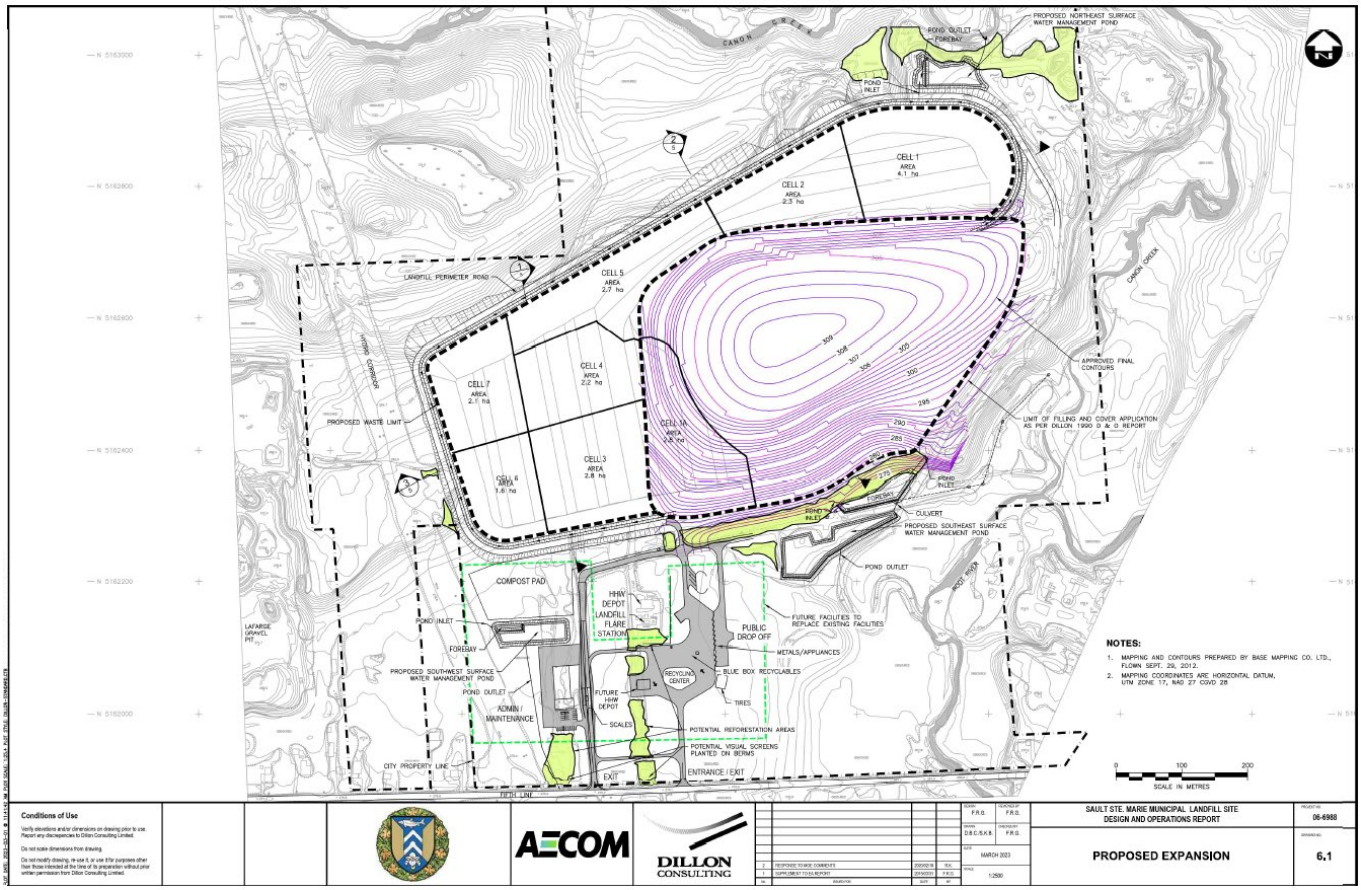
This map displays the proposed project location in the City of Sault Ste. Marie along with major roads. The Sault Ste. Marie Landfill is located at 402 Fifth Line East.



[*Source: : https://saultstemarie.ca/Cityweb/media/Building/Landfill/SSM-Solid-Waste_Management-EA_FINAL_Jan2024_Excl-App.pdf*]

Figure 2: Preferred Alternative

This figure displays the existing 25.8 hectare landfilling area, along with the preferred alternative for implementing the expansion – a horizontal expansion to the north and west increasing the total landfill area to 43.6 hectares. The 7 new proposed disposal cells are labeled in this figure, along with the area of the existing landfill where waste is proposed to be mined (Cell 1A). Expansion to the west would require the relocation of the public drop off area, inbound and outbound scales, scale house, administration and maintenance buildings.



[Source: https://saultstemarie.ca/Cityweb/media/Building/Landfill/SSM-Solid-Waste_Management-EA_FINAL_Jan2024_Excl-App.pdf]

3. Results of the Ministry Review

The Ministry Review provides an analysis of the EA. This review is not intended to summarize the EA, nor present the information found in the EA. For information on the evaluation process used to assess the alternatives, please refer to the EA. The EA and supporting documentation outline the EA planning process and demonstrates how the proponent selected the preferred project.

The purpose of the Ministry Review is to determine whether:

- The EA has met the requirements of the ToR and the EAA.
- There are any outstanding issues with the EA.
- The proposed project has technical merit.

3.1 Conformance with ToR and EAA

3.1.1 Ministry Analysis

The ministry concluded that the amended EA followed the framework and commitments made in the approved ToR and meets the requirements of the EAA.

Appendix A includes the ministry's assessment which has led to the above conclusion.

3.2 Consultation

One of the key requirements of the EAA is consultation. The City consulted with Indigenous communities, agencies, and the public during the preparation of the EA.

Section 17.3 of the EAA states:

"When preparing proposed terms of reference and an environmental assessment, the proponent shall consult with such persons as may be interested."

The City documented its consultation activities adequately in the EA. Section 9.0 of the EA provides an overview of the consultation activities, with the complete consultation record documented in the EA's Public Consultation Report, found in Appendix O of the City's EA. Below is a brief description of the consultation undertaken.

The City's consultation program included:

- Establishing a project website with EA documentation
- Distribution of notices (Notice of Commencement, Notice of Public Open House)

- Hosting public open houses and workshops
- Consultation with agencies and organizations
- Discussion groups and presentations
- Engagement with Indigenous communities and groups
- Circulating notices via local newspapers and mail outs
- Newsletter updates
- Publishing the draft EA for a comment period from May 24 to July 7, 2017

Following submission of the EA to the ministry on January 12, 2024, the ministry provided Indigenous communities, the GRT, and members of the public with an opportunity to review the EA and submit comments during the 7-week EA submission comment period.

3.2.1 Comments Received

All comments received following the submission of the EA were forwarded to the City for a response. Tables 1 to 3 in Appendix B of this Review documents all comments received, the City's responses, and the ministry's position on the responses. Below is a summary of the comments that were received.

Government Review Team

Draft Environmental Assessment

Many of the comments provided on the draft EA were addressed in the final EA submitted to the ministry. Comments included requests for:

- Additional information for the air quality and greenhouse gas emissions assessments
- More clarity and information on how the City met the requirements of the ToR and on justification for the capacity over a 25-year planning period, and more detail in the EA
- Commitments for a groundwater monitoring plan, buffer zone size validation, further modeling and a stormwater monitoring program
- More information on groundwater quality concerns along the landfill's western boundary
- Further description of existing noise and vibration conditions, to align with MECP noise guidelines, and calculations for projected noise emissions
- Consideration of the recommendation to align with the Provincial Policy Statement

- Further commitments for mitigation on drinking water systems
- More details on the surface water monitoring plan, mitigation measures, thermal impacts, monitoring for erosion, and stormwater management plan
- Further details for the quantities for fill rate, fill area, total waste, and liner cost to benefit analysis, as well as design detail requests including a 30 m setback buffer from the property's boundary, leachate/landfill gas management systems, final landfill cover thickness details and post closure plan information

Final Environmental Assessment

The GRT reviewed the final EA to confirm that the information and conclusions of the EA were valid and that their comments on the draft EA were addressed. During the EA submission comment period, the Ministry of Natural Resources (MNR) and MECP provided comments.

MNR requested amendments to the EA to address their respective mandated areas of interest, including:

- How aggregate resources were considered in the EA
- The restriction of vegetation removal for bird habitat protection

MECP provided comments on the final EA, including requests for:

- Greater detail with respect to leachate, surface water, groundwater and stormwater management
- Greater detail with respect to erosion, vegetation removal, contingency planning, mitigation and monitoring plans, and the impacts of climate change on the site's hydrogeology
- Highlighted options for improving the efficiency of the landfill gas collection system
- Commitments to schedule tree and vegetation removal outside of sensitive timing periods for migratory birds, Species at Risk (SAR) bats and reptiles
- Maintenance of a buffer zone around sensitive water features
- Further assessment on vibration effects
- Information about noise receptors for vacant lands and access route noise
- Commitments that the stormwater management works will be submitted in an updated ECA
- Monitoring to be updated for air quality parameters, emission rates from trucks, emission rate calculations and emission rate modeling
- Harmful substance monitoring/mitigation to be be added for leachate, well water

testing and the groundwater monitoring program
- Ministry support for extending municipal water services along the landfill, and the municipality's acquisition of the nearby properties
- Consideration of the recommendation that the landfill pump station should include emergency power
- Further documentation of Indigenous consultation activities

All comments were addressed by the City through amendments made to the EA. Further details on how the City responded to the comments received is provided in Table 1 of Appendix B.

Public comments

Many of the comments provided on the draft EA were addressed in the final EA submitted to the ministry.

The City addressed one comment from a member of the public during the draft EA comment period, regarding potential contamination of groundwater from the landfill and the need for contingency plans. The City addressed these comments by providing further details on leachate management, the private well monitoring program, contingency measures and groundwater monitoring.

Three members of the public and one local business owner submitted comments during the final EA submission comment period. The residents had comments on the landfill's waste disposal capacity, waste reduction methods, potential groundwater contamination, potential extension of the municipal water supply and landfill odour. The local business owner offered their aggregate services as an avenue to lower industrial waste and free up additional capacity at the landfill.

The City responded to all comments received on the final EA, which is documented in Table 2 of Appendix B.

Indigenous Communities

The following Indigenous communities were identified for consultation purposes:

- Garden River First Nation
- Missanabie Cree
- Métis Nation of Ontario Historic Sault Ste. Marie Traditional Territory Consultation Committee
- Batchewana First Nation

- Historic Sault Ste. Marie Métis Council
- Anishinabek/Union of Ontario Indians
- Association of Iroquois and Allied Indians

Batchewana First Nation (BFN) was the only Indigenous Community to provide comments on the draft EA. They informed the City that further discussions were necessary for them to endorse the project and provided input on how to be engaged in consultation. BFN noted that they require funding for a third-party to review the draft EA to confirm the project will not impact their treaty rights and interests, nor impact the land, groundwater, flora, fauna and other environmental features.

During the seven-week comment period for the final EA, only BFN provided comments. The Métis Nation of Ontario acknowledged receipt of receiving the EA on January 12, 2024, but provided no further comments. The ministry followed up with all of the identified Indigenous communities by email on February 2, 2024, and by phone on February 6, 2024, and February 21, 2024, to confirm whether they would be providing comments on the final EA. No response was received from Garden River First Nation, Missanabie Cree First Nation, Michipicoten First Nation, Anishinabek/Union of Ontario Indians and the Association of Iroquois and Allied Indians.

On January 18, 2024, a meeting between BFN and the City was held to discuss the project. BFN submitted a capacity funding request on January 31, 2024 to the City to support the BFN's review of the EA. On February 2, 2024, BFN informed the ministry that they would require additional time to submit their comments on the EA. The City approved BFN's capacity funding request and BFN provided the City with its comments on March 20, 2024, which related to the following:

- Impacts to bird and species at risk bat habitat, including bird migration timing windows, and mitigation measures
- Recommendations on the plans for stormwater management, fisheries screening, erosion and sediment control, tree protection and site isolation (fencing) during detailed design, and to obtain a new/amended approval from the ministry as part of the ECA application
- Hydrogeological and surface water assessments
- Landfill gas collection and future opportunities for energy
- The Stage 1 and 2 archaeological assessments and a request for engagement with Indigenous communities during the Stage 3 assessment
- Air quality and noise assessments

The City responded to BFN's comments by email on November 27, 2024. The ministry

followed up with BFN on December 4, 2024, and January 9, 2025, to determine if they had any comments regarding the City's response. BFN responded on January 13, 2025, that they did not have a timeframe for their response and indicated that they had requested additional capacity funding, beyond what was already provided by the City, to review the City's responses.

In December 2024, BFN's comments and the City's responses were circulated to the GRT for review. The City subsequently amended the EA and resubmitted it to the ministry in August 2025. The ministry forwarded the amended EA to BFN on September 10, 2025. Overall, the GRT was satisfied with the City's responses to address BFN's concerns, but suggested the following natural heritage, cultural, and air quality updates/mitigation measures for the amended EA:

- Limit clearing to non-sensitive seasons to protect breeding birds and SAR bats
- Avoid impacts to newly listed endangered SAR bat and their habitat
- Implement exclusion fencing, site controls and surveys to prevent harm to SAR species
- Update terminology to use "Indigenous" and provide descriptions of cultural heritage conditions
- Document cultural heritage conclusions using Ministry of Citizenship and Multiculturalism screening criteria in the EA
- Incorporate the results of Stage 1–2 Archaeological Assessments into the EA
- Include regulatory protocols for discovery of archaeological resources in accordance with applicable legislation
- Correct air quality reporting error by revisions to reflect equipment specifications rather than emissions
- Correct air quality reporting error by revising mislabeled emission information to reflect equipment specifications

After liaising with the ministry during September 2025, on October 9, 2025, BFN expressed concerns with the consultation completed during the EA and indicated it would not be providing another round of comments unless additional capacity funding was provided. After liaising with the City, the ministry reached out to BFN on November 20, 2025, communicating that the City is unable to provide additional capacity funding. The ministry reiterated that BFN would have an opportunity to provide comments on the Ministry Review when it is published, and MECP offered to schedule a meeting to answer any questions. BFN indicated that it would not be providing additional comments and that it no longer supports the project moving forward.

3.2.2 Ministry Conclusions on the Consultation Program

The EAA requires that the proponent consult with all interested persons during the preparation of the EA, provide a description of consultation activities undertaken by the proponent and document consultation results. Overall, the ministry believes that the City provided sufficient opportunities for Indigenous, government agency, and public consultation during the preparation and finalization of the EA.

The ministry is satisfied that the EA consultation that was undertaken is consistent with the Codes of Practice for Consultation in Ontario's EA Process and best practices, meets the requirements of the EAA and followed the consultation plan outlined in the approved ToR.

The ministry is of the opinion that the City responded to, and addressed, all comments received on the final EA study report, including all comments and concerns raised by BFN.

3.3 Conclusions of the EA Process

The ministry is of the opinion that the proposed landfill expansion would be designed and operated to comply with the ministry's standards and that the environmental effects of the proposed project would be managed through the commitments made in the EA, through conditions of approval and through additional work that must be carried out by the City in support of future approval applications, if the project is approved.

3.4 Other Considerations

Climate Change Impacts

In 2010, the City upgraded the landfill vent flares to a landfill gas collection system. The system reduces the quantity of methane released to the atmosphere and also reduces odours generated at the site. As part of the work completed for this EA, an assessment of greenhouse gas (GHG) emissions was completed.

The collected gas is currently being flared and the City is committed to mitigate GHG emissions by expanding the existing landfill gas collection system across the expanded site.

The City will continue to support and comply with the Provincial organics program requirements as they evolve. Presently the City offers a curbside and self-haul leaf and

yard waste collection program throughout the growing season and uses the composted material on City properties. The City is also planning to initiate a residential collection and composting program by approximately 2027 and is proceeding with the construction of a biosolids management facility that is expected to divert 10,000 tonnes of biosolids from disposal, thereby reducing GHG generation at the landfill site.

The City's 2015 Stormwater Master Plan and Guidelines document considered the possible impacts of climate change on drainage systems and stormwater best management practices. The proposed landfill expansion was designed in accordance with this document, and the stormwater management ponds have been designed for the 1:100 year storm event. Steps have also been taken to protect the site from erosion along the south and west banks of Canon Creek. Stone has been placed along the banks that border the site to mitigate potential erosion and reduce the likelihood of the creek migrating closer to the disposal footprint.

Cumulative Effects

The Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario (2014) encourages proponents to include information about the potential cumulative effects of the preferred alternative in combination with past, present and reasonably foreseeable future activities. The EA outlined steps for determining cumulative effects and determined that the effects from the landfill expansion would not overlap with those from other projects or activities in terms of biology, hydrogeology, surface water, atmospheric, archaeological, social, planned land use, visual, noise, odour, business and transportation. There are currently no known development applications within one kilometre of the proposed project.

4. Summary of the Ministry Review

This Ministry Review has summarized the ministry's analysis of the Sault Ste. Marie Landfill Solid Waste Management EA.

This Ministry Review documents the ministry's conclusions as follows:

- The EA complies with requirements of the approved ToR and has been prepared in accordance with the EAA. The EA provides sufficient information about the project and its potential impacts to enable a decision to be made about the application to proceed with the project.

- The EA includes an assessment and evaluation of alternative methods to arrive

at the preferred alternative, an assessment of the potential environmental effects of the alternative methods and the preferred alternative, and an assessment of the advantages and disadvantages of the preferred alternative, and provides a description of mitigation and monitoring measures to address the potential negative environmental effects of the proposed project .

- Appropriate opportunities were provided for the Indigenous communities, GRT and the public to participate and comment during the development of the EA. Concerns raised by the GRT, the public and Indigenous communities have been considered and addressed by the proponent in the EA, or a commitment has been made to consider concerns through future commitments and or permitting/approval processes

- If approval of the project is obtained under the EAA, standard conditions of approval are recommended for the implementation of the project (See Section 4.1 below)

4.1 Proposed Conditions of Approval

The ministry proposes to include several standard conditions of approval should the project be approved to proceed:

- General requirements to comply with the EA and commitments therein
- Documentation requirements for the public record
- Compliance monitoring and reporting provisions
- Preparation of a complaints protocol to be used during construction and operation

This list is not exhaustive, and additional conditions may be proposed subject to further review and consultation. During the five-week Ministry Review comment period and prior to the ministry making a recommendation to the Minister regarding approval of the project, additional conditions may be proposed.

5. What Happens Now?

The Ministry Review is available for a five-week comment period. During this time, all interested parties, including Indigenous communities, the GRT and members of the public can submit comments to the ministry about the proposed project, the EA and/or the review. At this time, anyone can make a written request that the Minister refer either all or part of the EA to the Ontario Land Tribunal for a hearing if they feel their environmental concerns have not been considered.

When making a decision, the Minister will consider the purpose of the EAA, the ToR, the EA, the review of the EA, comments submitted during the EA and Ministry Review comment periods, and any other matters the Minister may consider relevant.

The Minister will make one of the following decisions:

- Give approval to proceed with the project;
- Give approval to proceed with the project subject to conditions; or,
- Refuse to give approval to proceed with the project.

Next Step in the EA Process

ToR Approval
↓
EA Preparation
↓
EA Submission
↓
EA Comment Period
↓
Ministry Review
↓
Review Comment Period
↓
Minister's Decision

Prior to making that decision, the Minister may also refer either part of or the entire EA to mediation or to the Ontario Land Tribunal for a hearing and decision.

The Minister's decision on the application is subject to the approval of the Lieutenant Governor in Council.

5.1 Additional Approvals Required

If EAA approval is given, the City would still need to obtain other permits and approvals to design, construct and operate this project. Section 10.0 (Other Approvals), Table 10.1 of the EA outlines all additional approvals that may be required, such as;

- City of Sault Ste. Marie municipal zoning by-law amendment under the *Planning Act* for any changes to the site area
- New ECA for the proposed stormwater management works, under the *Environmental Protection Act* and *Ontario Water Resources Act*

- Amendment to the site's Waste Disposal Site ECA under the *Environmental Protection Act*
- Ontario Regulation 176/06 (Sault Ste. Marie Landfill Conservation Authority) permits under the *Conservation Authorities Act*

These approvals cannot be issued until approval is given under the EAA.

5.2 Modifying or Amending the Proposed Project

Any changes to the project outside the scope of this EA may be considered a new project pursuant to the EAA and may require the completion of a new comprehensive EA or the Environmental Screening Process for Waste Management Projects in accordance with Ontario Regulation 50/24 made under the EAA.

APPENDIX A

ENVIRONMENTAL ASSESSMENT ACT REQUIREMENTS

Appendix A: Environmental Assessment Act (EAA) and Terms of Reference (ToR) Requirements

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
Requirements in O. Reg. 53/24: General and Transitional Matters	Summary of EA: O. Reg. 53/24: s. 4(1)	EA must contain a brief summary of the EA organized in accordance with the matters set out in subsection 17.6 (2) of the Act.	The EA includes an executive summary organized in accordance with the matters set out in subsection 17.6 of the Act.
	List of Proponent-led Studies: O. Reg. 53/24: s. 4(1)	EA must contain a list of studies and reports which are under the control of the proponent, and which were done in connection with the project or matters related to the project.	The list of studies and reports that are under the control of the proponent and were undertaken in connection with the EA are listed in Section 11. This section contains a table outlining the background studies and reports conducted for the EA.
	List of Additional Studies: O. Reg. 53/24: s. 4(1)	EA must contain a list of studies and reports done in connection with the project or matters related to the project of which the proponent is aware and that are *not* under the control of the proponent;	The list of studies and reports that are *not* under the control of the proponent and were undertaken in connection with the EA are listed in Section 11. Section 12 of the EA contains a list of references and works cited for the EA report.
	Maps: O. Reg. 53/24: s. 4(1)	Where the environmental assessment is for a project with a fixed location, at least two, well marked, legible and reproducible maps showing the location of the project and the area to be affected by it.	Figure 1.1 (Key Plan) in section 1.3 of the EA shows the Sault Ste. Marie Landfill site. Figure 3.1 (Existing Sault Ste. Marie Landfill Site Plan) in section 3.3 of the EA shows the current layout of the Sault Ste. Marie Landfill site.

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			Figure 5.1 in section 5.1 of the EA shows the potential locations for the proposed landfill sites. Figures 5.2 to 5.5 (Alternative Methods 1 to 4 Site Plan Views) in section 5.2.2 of the EA show the site layout for alternative methods 1 to 4.
Problem / Opportunities	Identify an existing problem or opportunity and purpose of the Project: EAA: s.17.4(2)(c), s.17.6(2)(a) and s.17.6(2)(b)(i) and (ii)	The EA must contain a description of the purpose of the project. This should include an explanation of the problem or opportunity that prompted the proposed activity. The EA must include a description of a statement of the rationale for the project and its alternative methods. If a specific project has been identified provide a brief description.	The EA is required to follow section 3 of the ToR which outlines the project description. Section 1.2 of the EA indicates that the purpose of the ToR is to set the scope and describe the process that will be undertaken to address the problem of diminishing disposal capacity at the existing site. In 2005 the ToR was prepared documenting the planning process to obtain EA approval for the disposal component of the Solid Waste Management Plan. The ToR was approved by the ministry in 2005. The purpose of the project is to address the waste management needs within the existing service area, consisting of the City of Sault Ste. Marie, Prince Township and Batchewana First Nation's Rankin Reserve, for an additional 25 years of capacity (from 2024 to 2049). The project will also include opportunities for waste diversion and disposal. The City of Sault Ste. Marie will continue to investigate ways to divert waste from disposal by promoting and developing programs that support waste reduction, reuse and recycling. The City implemented and/or promoted/supported programs to divert typical "blue box" recyclables for single-family homes, multi-family homes and small businesses, electronic waste, Styrofoam, used tires, leaf and yard waste, clean wood and brush, Christmas trees, metals including white goods and appliances, propane tanks, batteries, household items, construction and renovation materials, and municipal hazardous waste. In addition to these programs the City has also set out limits for waste and landfill bans to encourage residents to divert waste. The proposed undertaking is an expansion of the Sault Ste. Marie Landfill footprint located at 402 Fifth Line East. The service area will

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			be the same as the existing landfill. The expansion will have a disposal capacity of 3.17 million m³ of waste and daily/intermediate cover (i.e. 1.78 million tonnes of waste). It is forecasted that waste will be landfilled at a maximum rate of approximately 76,000 tonnes annually. The landfill will only accept non-hazardous solid residential, industrial, commercial and institutional (IC&I), and construction and demolition (C&D) waste, and biosolids.
Alternatives	Description and Statement of the Rationale for the Alternative Methods: Alternative Methods EAA: s.17.4(2)(c),and s.17.6(2)(b)(ii)	"Alternative methods" include a description of different ways of implementing the project (locations and designs). A reasonable range of "alternative methods" should be identified and outlined.	Section 5.0 of the EA describes that the evaluation of alternative methods was to find a suitable location for the development of the additional landfill capacity that was needed. The City developed and evaluated alternative methods in two steps, and considered site specific factors which included leachate control, landfill gas management, buffer area, and waste and truck traffic amounts. Step 1 considered the feasibility of establishing a new landfill site in comparison to the expansion of the existing landfill and Step 2 considered different ways to expand the existing landfill site. The City developed evaluation criteria to identify and assess the potential impacts of the proposed landfill expansion alternatives on the natural environment (i.e., biology, hydrogeology, air quality, and noise) and socio-cultural environment (i.e., land use, archaeology and cultural heritage), economics (local business economy), cost (i.e., landfill lifecycle costs), technical considerations (i.e., development and operations, and exiting/proposed landfill infrastructure), and transportation (i.e., amount of truck traffic and travel distances). The City evaluated the net effects from each alternative method, then compared and ranked each method to determine the preferred alternative. The options for expanding the landfill to provide additional waste disposal capacity were: • Alternative 1 – West Expansion • Alternative 2 – West and North Expansion A • Alternative 3 – West and North Expansion B • Alternative 4 – West and South Expansion

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			<u>Alternative 1 – West Expansion</u> Alternative 1 – West Expansion involves the expansion of the current site from the western edge towards the hydro corridor. The height of the expansion would be the same as the existing landfill and the average depth of expansion would be 18 metres. Expansion to the west would require relocation of several facilities; the public drop off area, inbound and outbound scales, scale house, administration building and maintenance building. The estimated disposal capacity is 3.17 million m^3 assuming that current waste densities are achieved. The soil generated by the base excavation is expected to supply soil for cover needs with a modest surplus available as a contingency. **<u>Alternative 2 – West and North Expansion A</u>** Alternative 2 – West and North Expansion A would expand the western and northern limits of the existing landfill. The height of the expansion would be the same as the existing landfill and the average depth of the west expansion would be 18 metres. By including a northerly expansion, this alternative preserves the public drop-off area, inbound and outbound weigh scales, scale house, administration building and maintenance building. The estimated disposal capacity is 3.17 million m^3 assuming that current waste densities are achieved. The soil generated by the base excavation is expected to supply soil for cover needs with a modest surplus available as a contingency. **<u>Alternative 3 – West and North Expansion B</u>** Alternative 3 – West and North Expansion B is a combination of Alternatives 1 and 2 which includes the expansion of the landfill from the western edge of the existing site towards the hydro corridor and a northern expansion from the northern limit of the existing landfill. The height of the expansion would be the same as the existing landfill and the average depth of the west expansion would be 11 metres which is

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			7 metres shallower than the other alternatives. This is possible due to the increase in surface area available for this expansion alternative. Expansion to the west would require the relocation of the public drop off area, inbound and outbound scales, scale house, administration building and maintenance building. The estimated disposal capacity for Alternative 3 is 3.17 million m³ assuming that current waste densities are achieved. The soil surplus generated by the base excavation is expected to supply soil for cover needs with a modest surplus available as a contingency. **<u>Alternative 4 – West and South Expansion</u>** Alternative 4 – West and South Expansion involves two separate landforms for the expansion. The first is an expansion west from the existing western limit of the site and the second is south of the southern limit of the existing site. The height of the expansion site would be the same height as the existing site and the average depth of the expansion is 18 m. Expansion to the south and west would require relocation of the Household Hazardous Waste facility and blower station. In addition to the 30 metre setback from the hydro corridor, there is also a 100 metre setback from Fifth Line. Creating separate landforms requires larger footprints since a separate landform cannot build on an existing side slope. The estimated disposal capacity is 3.17 million m³ assuming that current waste densities are achieved. The soil surplus generated by the base excavation is expected to supply soil for cover needs with a modest surplus available as a contingency. A new site was not considered to be practical given the limited location options, while the City's knowledge of the existing site's hydrology monitoring results, demonstrates that the site is well understood compared to a new site where the groundwater movement is less known. Four landfill expansion alternatives were developed based on the existing site characteristics and the available area to expand. The preferred Alternative 3 – West and North

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			Expansion B sees the existing site expand to the west and north. The City concluded that the preferred alternative will also incorporate landfill mining, since it has long term benefits to groundwater and the potential effects (primarily odour related) are short term. The do-nothing alternative was also considered as a benchmark comparison associated with the analysis in the EA of the advantages and disadvantages of proceeding with the preferred alternative. The ministry is satisfied that a reasonable range of alternative methods were described in the EA and evaluated using a broad range of environmental criteria and measures.

Evaluation	Description of the Environment for the project and alternatives:
	
	EAA: s. 17.6(2)(c)(i) and 17.4(2)(c)
		Proponents must consider the broad definition of the environment including the natural, biophysical, social, economic, built and cultural conditions.
		
		The EA must provide a description of the existing environmental conditions in the study area.
		
		The EA must identify those elements of the environment that may be reasonably expected to be affected, either directly or indirectly, by the proposed project and/or the alternatives.
			A preliminary description of the existing environment was provided in section 5 of the ToR. The ToR contained the commitment that a more detailed description of the existing environmental conditions would be prepared as part of the EA to assess the potential effects of the alternatives on the environment.
			
			Section 3.0 of the EA describes a general inventory of the existing conditions within the project's service area which includes the City of Sault Ste. Marie, Prince Township, and Batchewana First Nation's Rankin Reserve. Detailed information addressing the existing environment within the on and off-site study areas (i.e., proximal to the landfill site) have been included in the EA technical reports.
			
			A description of the existing environment is completed for each environmental criterion to provide the baseline for determining the potential effects resulting from the project. The data which was collected from available secondary source information and the sources used have been included in Section 11 of the EA. The environmental components described in the EA are:
			
			• Section 3.1 – Natural Environment
			  ○ Section 3.1.1 – Geology / Hydrogeology / Soils
			  ○ Section 3.1.2 – Surface Water

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			○ Section 3.1.3 – Climate ○ Section 3.1.4 – Biology ▪ Section 3.1.4.1 – Vegetation ▪ Section 3.1.4.2 – Wildlife ▪ Section 3.1.4.3 – Fisheries • Section 3.2 – Social / Cultural Environment ○ Section 3.2.1 – Archaeological / Cultural ○ Section 3.2.2 – Social ○ Section 3.2.3 – Official Plans and Policy Documents ○ Section 3.2.4 – Land Use ○ Section 3.2.5 – Transportation ○ Section 3.2.6 – Municipal Servicing Network ○ Section 3.2.7 – Economics ▪ Section 3.2.7.1 – Tourism and Recreation ▪ Section 3.2.7.2 – Forestry ▪ Section 3.2.7.3 – Agriculture ▪ Section 3.2.7.4 – Mineral Resources • Section 3.3 – Existing Landfill The ministry is satisfied that a broad definition of the environment was considered and a description of existing environmental conditions in the study area was provided.
	Description of Potential Environmental Effects for Alternatives: EAA: s.17.4(2)(c), and s.17.6(2)(c)(ii)	The EA must include a description of the effects that will be caused or might reasonably be expected to be caused to the environment. Both positive and negative environmental effects should be included. The EA must identify methods and studies used to analyze the	The City describes the potential effects considerations of the project in section 7.0 (Potential Net Effects) and section 7.5 (Consideration of Cumulative Effects) of the EA. The EA includes a summary of the net effects assessment for each of the environmental criterion (natural environment, socio-cultural environment, atmospheric air quality, and economic environment), an assessment of cumulative effects and advantages and disadvantages of each alternative. The EA assesses both positive and negative effects of the alternatives. The evaluation method included identifying proposed mitigation measures to minimize or avoid any potential negative environmental effects of the

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
		potential environmental effects. The methods used are contingent on the type of project. Impact assessment methods and criteria used during the evaluation should be identified. The methods chosen must be clear, traceable and replicable so that interested parties can understand the analysis and logic used throughout the EA.	preferred project being considered as part of the EA process. The EA identifies the net effects of the project during both construction and operation. Natural environment net effects include changes to surface water and groundwater quality and quantity, ecosystem loss or alteration (terrestrial and aquatic). Socio-cultural environments net effects include changes to archaeological, social, land use and visual. Atmospheric air quality net effects include changes to air quality, greenhouse gas emissions, odour and noise. Economic environment net effects include impacts to business and transportation. Proceeding with the project is predicted to cause environmental effects. However, when taking into account the implementation of standard and site-specific environmental protection mitigation measures described in section 7.0 of the EA, the net effects associated with the project can be reduced or eliminated. The EA provided a description of the effects that may be caused to the environment. The evaluation method in the EA used to determine potential environmental effects is clear, traceable, replicable and appropriate for the proposed landfill expansion project.
	Description of the Actions Necessary or that may be necessary to Prevent, Change, Mitigate or Remedy the Environmental Effects for the alternatives: EAA: s.17.4(2)(c), and s.17.6(2)(c)(iii)	A description of future commitments, studies and a work plan may be included as part of the actions necessary to prevent, change, mitigate or remedy environmental effects for each alternative for the ultimate purpose of comparing them.	Section 8.0 of the EA describes the environmental effects monitoring which may be used to ascertain the effectiveness of mitigation measures, and contingency measures to address unexpected occurrences. Monitoring of the hydrogeology, landfill gas, landfill mining, and transportation is proposed. Commitments related to the construction, operation, closure and post-closure of the landfill are listed in Table 8.2: Table of Commitments to Mitigation and Monitoring.

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
	Evaluation of Advantages and Disadvantages to the Environment for the Project and Alternatives EAA: s.17.4(2)(c), and s.17.6(2)(d)	The preferred alternative should be identified through this evaluation.	Section 5.2.4 (Overall Evaluation of Alternatives) Table 5.12 identifies the advantages and disadvantages of each alterative, with consideration of the ranking of alternatives for each criteria group. The EA presents a summary of the differences between each alternative method and summarizes the advantages and disadvantages of the preferred alternative based on the net effects of the preferred alternative. The EA adequately describes the advantages and disadvantages of the proposed project to the environment based on potential environmental effects.
	Description of Consultation with Interested Stakeholders EAA: s.17.4(2)(c), and s.17.6(2)(e)	A description of any consultation undertaken for the Project and the results of that consultation must be documented. The description should include consultation methods used, frequency of consultation, dates that events occurred, target audience, descriptions of key milestones for which stakeholders are providing input, comments received. The EA must identify any Indigenous community consultation efforts that have been made including methods for identifying potentially interested Indigenous communities, who was consulted, when and how consultation occurred and any comments received from Indigenous communities. The EA should outline conflict	A description of stakeholder consultation is included in section 9 (Public and Agency Consultation) of the EA, which includes the methods used to identify and gain input from stakeholders, the frequency of consultation, and a description of key engagement milestones was provided. Key consultation methods included distribution of public notices, public open houses, mailings, workshops, and a project website. Section 9.5 (Aboriginal Communities and Agencies) of the EA describes the consultation undertaken with Indigenous communities. Indigenous communities that were consulted on the basis that they have or may have constitutionally protected Aboriginal or treaty rights that may be affected by the project were: • Batchewana First Nation • Garden River First Nation • Historic Sault Ste. Marie Metis Council • Métis Nation of Ontario Historic Sault Ste. Marie Traditional Territory Consultation Committee • Missanabie Cree • Anishinabek/Union of Ontario Indians • Association of Iroquois and Allied Indians

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
		resolution techniques used by the proponent to resolve outstanding issues with any stakeholders. There must be clear documentation as to how issues and concerns have been addressed.	Letters and emails were sent to each of the communities advising of notices, open houses, and draft reports which took place throughout the planning process. The EA demonstrates how public/agency input received throughout the EA process informed the results of the EA. The EAA requires that proponents consult with all interested persons during the preparation of the EA and report on the results of that consultation. The ministry is satisfied that the proponent appropriately carried out the consultation plan in accordance with the Code of Practice: Consultation in Ontario's Environmental Assessment Process (2014) that was committed to in the approved ToR. Overall, the ministry is satisfied that the public, agencies and Indigenous communities had opportunities to comment and provide input on the EA throughout the process.
Selection Process	Proposed Project Description and Statement of the Rationale for the project: EAA: s.17.4(2)(c), and s.17.6(2) (b) (i) and (c)	The description of the project should specify what the proponent is seeking approval for under the EAA. The description should include information on the location, attributes, dimensions, emissions etc. The evaluation process should identify which is the preferred project.	The evaluation process in Sections 4 and 5 of the EA explains why alternatives were chosen and why the preferred undertaking was selected. A net effects assessment was undertaken for the alternatives and the preferred alternative was selected only after determining it would cause the least impacts on the surrounding environment. Section 6 of the EA provides a description of the preferred undertaking. A summary of the proposed undertaking is provided in Section 2.5 of this Review. The EA documents how the preferred undertaking addresses the problem and opportunity statement, which is to provide additional capacity at the landfill site as the current site is reaching capacity. Section 8.4 of the EA detail commitments to future work. Standard conditions including compliance monitoring and reporting, and public

EA Decision Making Process	EAA and ToR Requirements	Description and Characteristics of the Requirements	Analysis of the Environmental Assessment
			record-keeping are recommended by the ministry to ensure all commitments in the EA are carried out.
Other Approvals	Additional Approvals	Outline additional approval requirements. Provide sufficient detail about the nature of the approval.	If EA approval is granted, the proponent will still require other legislative approvals to construct and operate the project. Section 10 (Other Approvals) Table 10.1 of the EA outlines additional approvals that may be required, such as environmental compliance approvals, permits under the Conservation Authorities Act, project registration under the Endangered Species Act, and agreements from the MECP, MNR, and MCM.

APPENDIX B

SUBMISSIONS RECEIVED DURING THE EA COMMENT PERIOD

Table 1. Government Review Team Comment Summary Table

Proposal: City of Sault Ste. Marie Solid Waste Management Environmental Assessment (EA)
Proponent: City of Sault Ste. Marie

Summary of Comments	Proponents' Response	Status
Ministry of Natural Resources (MNR)		
MNRF uses the Provincial Policy Statement: Training Manual for Non-renewable Resources (1997) ("Training Manual"), as a resource when considering the potential impacts of proposed projects on aggregate resources. The manual states non-aggregate related development that may preclude or hinder access to the mineral aggregate resource should not be permitted within or adjacent to areas of known deposits or adjacent to mineral aggregate operations. Where an application for development occurs on or within 300 m of a known unconsolidated deposit (e.g., sand, gravel, clay) or a mineral aggregate pit operation, the proponent should be required to assess the impact of the proposed development on the mineral aggregate resource and the mineral aggregate operations. It is recommended that the proponent incorporate the information and analysis as per Section 5.0 of Training Manual into the EA, prior to approval.	There will be situations where a municipality will want to approve development applications resulting in hindering or precluding the use of aggregate resources. However, in doing so, municipalities are encouraged to restrict such situations to those where it is deemed absolutely necessary and in keeping with the intent of the Provincial Policy Statement. Such situations may include: 1. Situations where the information on the quality, quantity and location of the aggregate resource in the context of market demands in the local, regional and provincial demand make it highly unlikely that an aggregate operation would ever be considered; 2. Situations where the establishment of an aggregate operation is unlikely due to environmental, public health or public safety considerations that presently exist in the area; 3. The applicant has established that the proposed land use or development serves a greater long term public interest and there is no reasonable alternative location for the proposed land use. As noted, the application is for an expansion of an existing landfill site within an aggregate designation	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
	area and within a Rural Aggregate Extraction Zone. Section 5.0 of the Training Manual references situations where municipalities will want to approve or undertake developments that may impact an aggregate resource. In this instance the City has reviewed in detail all practical options for the establishment of additional disposal capacity to service the City and surrounding areas and concluded that an expansion of the existing landfill is the most viable, cost efficient, environmentally acceptable solution to meet the waste management needs for the service area. The alternatives considered within the EA leveraged and considered a previous detailed greenfield site search conducted by the City. The conclusions reached through this EA was that with due consideration of all elements of the environment, an expansion of the existing site is viable, cost efficient, environmentally responsible and convenient for the Community. The proposed design of the landfill expansion includes the excavation of existing native on-site soils for use in the ongoing operation of the site. Landfill sites require significant volumes of suitable soils to provide daily, interim, and final cover over disposed waste. Soil cover is important to mitigate wind blow litter, foraging by wildlife and to mitigate odours. Daily cover is used to cover wastes that are tipped at the working face each day the site is operational. Interim cover is typically applied when a portion of the site becomes inactive for a period of time and final cover is applied once a portion of the site has reached capacity. The site has been carefully designed to achieve a soil balance meaning	

Summary of Comments	Proponents' Response	Status
	that the site excavation activities will generate adequate soil volumes to support the lifecycle operation of the facility. This precludes the need for identifying an off-site source of sand and the importation and hauling of imported material to the site. Importing sand would result in increased operating costs and increased environmental impacts associated with the hauling operations. The proposed project is also the most cost-effective solution which is, in part, attributable to the type and quantity of on-site soil that can be sourced for cover but also due to the ability to continue to use many of the on-site infrastructure elements. It is important to highlight the alignment of this project with the Provincial Policy Statement as reflected in Table 7.15 of the EA.	
The EA does not clearly address the potential direct and indirect effects of the proposed undertaking on the aggregate resources and existing aggregate resource operations within the area of influence. Additional clarification to verify the extent of the Contaminant Attenuation Zone ("CAZ") and if the CAZ will include the lands underneath the active aggregate extraction site (ALPS ID 7636) is recommended. The EA does not clearly indicate how the intended mitigation measures will ensure the mineral aggregate resources and businesses will be protected from the effects of the undertaking.	The landfill site has been operating at this location since the 1960's. It was operated by a private entity until the late 80's when it was purchased by the City of Sault Ste. Marie. Since that time the facility has been successfully and responsibly operated by the City. Under the expansion proposal the operations, and in particular, the leachate management controls will be enhanced relative to past operating practices. The expanded site will include the construction and installation of a liner and leachate collection system for all new waste cells and for the area of the existing site where landfill mining is proposed (ie. southwest portion of the existing footprint). During the site's operating history, the City has not received any complaints from the aggregate pit operators in	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
	the area nor have the pit licensees raised any concerns that the landfill is adversely impacting their operations. During this study there have been opportunities to provide input through various means. The only comment received from a pit operator was related to pit license 19583 whereby the license holder requested confirmation that they will continue to be granted access to the pit through the landfill site. Confirmation was provided to the license holder that pit access would continue to be granted through the expanded landfill site. Based on the current proposal there is no intent to expand the CAZ beneath the adjacent active aggregate extraction site. The proposed leachate management infrastructure that is inherent in the proposed project together with the additional buffer land acquisitions that have been completed or are ongoing are expected to meet the MECP requirements for groundwater quality without an expansion of the CAZ onto the neighbouring aggregate extraction properties. The City has not been made aware of any historical adverse impacts to the operations of the mineral aggregate extraction operations in the area, the leachate management features will be enhanced through the expansion of the site, the City is not expecting any adverse impacts to adjacent pit operations in the future, and the City will continue to work with neighbouring property owners to address any unforeseen concerns that may arise.	

Summary of Comments	Proponents' Response	Status
The EA states all property owners and tenants within a 1000 m radius of the site were included on the 'Project Contact List'. However, clear consultation with the Aggregate Licensee (ALPS ID 7636) could not be found in the EA. The proposed CAZ may overlap with this existing aggregate license.	Given that the licensee is within a 1000 m radius of the site, they were included on the Project Contact List and provided with all notifications regarding this project. Much like all property owners in the vicinity of the landfill site, the area pit owners/operators have been given ample opportunity to provide comments, request clarification or ask questions regarding the proposed landfill expansion. There is no specific input from the licensee as they have not been historically impacted and presumably, they have no concerns with the proposed expansion.	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
I appreciate your clarification that the proposed landfill expansion does not involve extending the Contaminate Attenuation Zone beneath the adjacent active aggregate site (ALPS ID 7636).	Acknowledged, no changes required.	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
I'd like to acknowledge your comments regarding Provincial Policy Statement ("PPS") 2.5.2.5 and your summary of criteria for permitting development and activities that would preclude or hinder the establishment of new operations or access to deposits of mineral aggregate resources. I'd Like to clarify that Section 5.0 of the *Provincial Policy Statement: Training Manual for Non-renewable Resources (1997)* ("Training Manual"}, outlines information requirements that should be required to evaluate the impact of a proposed develop on the deposits of mineral aggregate resources and develop mitigation measures that will allow an approving authority to decide on such a proposal. I agree that there	Based on your August 19, 2024 letter we believe there may be a need for clarification as our intention was not to waive the protection of the aggregate resource but rather highlight how the City plans to beneficially use this resource and secondly to highlight that on balance the planned project reflects an environmentally acceptable means of managing residual waste in the City and surrounding area while also respecting provincial policy. We have provided some additional information below to provide further clarity in relation to the proposed beneficial use of the resource.	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
are instances where protection of deposits of mineral aggregate resources may be waived (see PPS 2.5.2.5 and Training Manual Section 5.4), however it is important to recognize that deposits of mineral aggregate resources are still considered part of the environment and should still be considered in an environmental assessment. Rather than presenting the assessment as the protection of aggregate resources will be waived, therefore investigation into the impacts of the project on the aggregate resources do not need to be considered. Given the deposits of mineral aggregate resources within the area of this project are of primary significance, it remains the position of the ministry, that the environmental impacts of the proposed project on these aggregate resources should be considered in the environmental assessment.	In the first instance we intended to highlight that the impact on the aggregate resource was considered in the evaluation of impacts on the environment. In our response we highlighted the need for and the planned beneficial use of the on-site aggregate resources. The planned landfill expansion includes both below grade and above grade landfilling and the site design has been carefully planned to balance the excavation quantities with the overall soil cover needs required for site development. We estimate that there is a need for approximately 1,000,000 m^3 of sandy soil for site operations and we plan to mine the on-site soil for use as landfill cover. The on-site soils are well suited for this use as they are dry, generally free draining and are suitable for compaction. It is important to recognize that if this resource was not available on-site the City would have to mine an alternate site and import the cover material to the active landfill. This would result in increased costs and adverse impacts to the environment associated with the off-site mining operation and hauling operations. The proposed project will make beneficial use of the on-site aggregate resources and will preclude adverse impacts associated with importing similar material sourced elsewhere.	
At the time, Species at Risk ("SAR") legislation resided with MNRF. However, this legislative responsibility now sits with MECP. Therefore, MECP would be the appropriate ministry to consult on the if this EA fulfills the SAR considerations.	MECP has been engaged regarding the SAR screening and potential permitting requirements under the Endangered Species Act. This engagement will continue through the remainder of the EA Planning phase and during the formal ECA permitting phase of the project.	MNR has indicated that it is satisfied with the proponent's response and has no further comment.

Summary of Comments	Proponents' Response	Status
		The ministry is satisfied this comment has been addressed.
Table 7.2 of the EA states: "Vegetation removal should not take place during the established core breeding bird season (i.e., May 9th to August 8th)." As a mitigation measure and to ensure protection of bird habitat, MNRF recommends the EA refer to the Government of Canada Nesting Period website for appropriate timing windows for C3 and C4 nesting periods (mid April to late August) and the Significant Wildlife Habitat Criteria Schedules For Ecoregion 5E (ontario.ca).	The Government of Canada Nesting Period for migratory nesting birds timing windows and SWH Criteria Schedules for Ecoregion 5E will be reviewed prior to construction and the timing windows adhered to.	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
If stick nests are found MNRF kindly requests that the local MNRF District Office be notified at MNRF.SSM@ontario.ca or 705-949-1231.	We confirm that provisions will be included in the implementation phases to ensure MNRF will be notified of any stick nests found.	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
I have reviewed the correspondence letters dated February 29th, July 3rd, August 19th, and August 29th, 2024. We recognize that the planned use of on-site aggregate resources aligns with MNR's mandated interests, particularly in ensuring responsible resource management. Furthermore, it is noted that appropriate mitigation measures and regulatory engagements, including those related to species at risk and migratory bird habitat protection, have been incorporated into the project.	Acknowledged, no changes required.	MNR has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
At this time, there appear to be no outstanding concerns from MNR regarding the proposed EA.		
Ministry of the Environment Conservation and Parks (MECP)- Adaptation and Resilience Branch		
Page 11, EA planning process, Section 1.8, Under section: documentation and approvals. There's a mistake in the reference to the name of the MECP. It's written as the former name of the ministry: Ministry of the Environment and Climate Change. Please update the name of the MECP from MECC to MECP.	Acknowledged, subsequent revisions have been made to the EA Report as required.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 118, Section 5.2.6 Collection of Landfill Gas and Leachate Treatment. Note: while this section indicates: "The study is considering current and future flows and will address equipment and force main capacity, and contingency planning and associated provisions including consideration of standby power", Consider supplementing this section with acknowledgement for consideration of the impact of climate change on the project.	Climate change has been addressed in the EA report. Please refer to Section 6.6.4 p.g.133 under "Separation of Surface Drainage System from Leachate", Table 7.15 p.g. 188, Section 7.6 p.g. 217-219 and Table 8.2 p.g. 231. The impacts of climate change are continuing to evolve. The City is committed to design operate its infrastructure with due consideration of climate change. For example, the most recent version of the City's stormwater management design guidelines incorporated increased design storm intensities. The City's committed to considering the potential impacts of climate change in the detail design of the on-site leachate collection system and the on-site	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
	wastewater pumping station.	
Page 131, Section 6.6.3 Leachate & Groundwater Management. This section talks about minimum design standards for the leachate management system for the proposed expansion, but it does not acknowledge or refer to consideration of the potential impact of climate change (notably extreme rainfall) on the leachate and groundwater management system. Consider supplementing this section with acknowledgement for consideration of the impact of climate change on the project.	During extreme rainfall the impacts to the subsurface infrastructure is tempered once the ground becomes saturated. However, during the detail design phase the leachate collection system will include consideration of climate change.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 133, Separation of Surface Drainage System from Leachate. Note for reference: This section talks about the collection ditch for non-contaminated stormwater originating from the non-operating areas of the landfill, and how that will be conveyed to three stormwater management ponds. Ditching will be designed to accommodate the peak flow generated from the 25-year design storm. Berms or ditching will be used to divert any non-contaminated stormwater away from landfill excavations where it may cause operational problems and from operating areas where it may come in contact with waste. Consideration of the potential impacts of climate change (e.g. more frequent or severe storm events) will be incorporated into detailed design as appropriate. No comment, just making note of the commitment to consider the potential impact of climate change in the design.	The potential impacts of climate change will be considered with all infrastructure elements at the time of detail design and will also be considered during the construction phase. Contingencies can be considered in the design it is also important to recognize that it is not cost effective or practical to design for all potential conditions.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Page 134, Erosion and Sediment Control Plan, "During the construction and operation of the landfill site, large volumes of soil will be moved and/or exposed during excavation and preparation of the landfill area. During this period, non-vegetated areas are particularly vulnerable to soil erosion. Erosion control and mitigation shall include some or all of the following temporary and permanent controls". This section should also consider the potential impact of climate change on the project in terms of extreme precipitation events and the need to ensure adequate measures are in place to prevent erosion. Consider including reference to the potential impact of climate change on the project in terms of extreme precipitation events and the need to ensure adequate measures are in place to prevent erosion.	The potential impacts of climate change will be considered with all infrastructure elements at the time of detail design and will also be considered during the construction phase (eg. temporary erosion control measures). Contingencies can be considered in the design it is also important to recognize that it is not cost effective or practical to design for all potential conditions. For example, exposed soil surfaces that could result in erosion will be vegetated where appropriate however in an extreme weather event even vegetated soil surfaces may experience soil erosion.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 148, Table 7.2 biology summary of net effects, "The expansion of the Sault Ste. Marie Landfill will require the removal of trees and ground vegetation (approximately 13 ha)." Comment: are there any other considerations related to the possible impact of the project on climate change, or the impact of climate change on the project? Consider whether the removal of 13 ha's of trees will have an impact in terms of the project's impact on climate change or in terms of the ability of the landscape to adapt to climate change.	The project includes vegetation treatments and reforestation plots to mitigate impacts – refer to Sections 7.2.1 and 7.3.4. The project will include erosion protection treatments to ensure the landscape can adapt to climate change.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 149, Table 7.2 biology summary of net effects, the section notes: "Potential for erosion and sedimentation effects will be limited to localized edge disturbance and/or	The potential impacts of climate change will be considered with all infrastructure elements at the time of detail design and will also be considered during the construction phase (eg. temporary erosion	Adaptation and Resilience Branch has indicated that it is satisfied with the

Summary of Comments	Proponents' Response	Status
loss of adjacent vegetation due to the deposition of dust and/or overland mobilization of soil." Comment: the section does not recognize the potential impact of climate change and potential of extreme precipitation and its possible effects on erosion. Consider including reference to the potential impact of climate change on the project in terms of extreme precipitation events and the need to ensure adequate measures are in place to prevent erosion.	control measures). Contingencies can be considered in the design it is also important to recognize that it is not cost effective or practical to design for all potential conditions. For example, exposed soil surfaces that could result in erosion will be vegetated where appropriate however in an extreme weather event even vegetated soil surfaces may experience some soil erosion.	proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 153, Table 7.3 Hydrogeology Summary of Net Effects, this section says that: "Based on the anticipated leachate generation for the site and the contaminant transport model, the site is predicted to meet appropriate criteria and have minimal impacts during the service life of the engineered systems that have been incorporated into the design assuming proposed mitigation is put in place in the design." Comment: there is no mention here of the consideration of the potential impact on climate change. Consider supplementing this section with acknowledgement for consideration of the impact of climate change on the project and the potential effects that might have on the site's hydrogeology.	The site has previously experienced extreme rainfall events and the impacts to the site's hydrogeology has not been problematic. It is recognized that climate change is evolving, and the site development is expected to span multiple decades. The design of all site infrastructure will consider the potential impacts of climate change.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 188, Table 7.15: Project Alignment with PPS 2020 PPS. The report notes that "Infrastructure should consider greenhouse gas emissions and impacts of climate change", and notes that "On-site stormwater ponds have been designed to retain the complete runoff from the 1:100 year rainfall."	Chapter 6 is the first section of the report where we focus on the preferred design option and hence this is the first instance where enhanced details are incorporated. It is already noted on page 133 that storm ponds will be designed for a 1:100 return period. The perimeter roadside ditches are part of the minor stormwater collection system and will be	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment.

Summary of Comments	Proponents' Response	Status
Comment: this is an important point and an important consideration that was not acknowledged earlier in the report, with respect to stormwater management. For example, on page 133 of the document, it states: "Ditching will be designed to accommodate the peak flow generated from the 25-year design storm. Consider reflecting this point in other sections of the report that refer to stormwater management.	designed to a 1:25 year return period.	The ministry is satisfied this comment has been addressed.
Page: 218 and 219, Section 7.6 consideration of climate change. This section includes consideration of the impact of the project on climate change and the impact of climate change on the project (from both an adaptation and GHG emission perspective). Focus on climate change impacts on the project is on measures taken to prevent erosion along the banks of Canon Creek. EA refers to the City of Sault Ste. Marie's Stormwater Master Plan and Guidelines document in 2015 which considered the possible impacts of climate change on drainage systems and stormwater best management practices. The proposed landfill expansion was designed in accordance with this guideline document and the stormwater management ponds have been designed for the 1:100 year storm event." Comment: there's very little consideration of the potential impact of climate change on the project (either during or after construction, or consideration of impact over the life of the expanded facility). Suggest the document provide a more robust consideration of the potential effects of climate change on the project,	Within the last decade the landfill site has been exposed to extreme weather and has fared well. The City has also been proactive to enhance erosion protection particularly along the Canon Creek stream banks which have been protected. The risk to the infrastructure that is the subject of this EA has been assessed and there is a relatively low level of vulnerability. In fact, the site was exposed to more than one extreme weather event over the past decade and the site has proven to be quite resilient. The most significant vulnerability was related to stream bank erosion along Cannon Creek which flows through the site. The City proactively addressed this vulnerability by enhancing the stream bank protection measures throughout the landfill site. This project is not particularly sensitive to climate change the potential impacts of climate change will be considered with all infrastructure elements at the time of detail design. Mitigation and controls will be considered during the construction phase (eg. temporary erosion control measures). Contingencies can be considered in the design it is also important to recognize that it is not cost effective or practical to	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
(including during and after construction, and consideration of impact over the life of the expanded facility). As per the ministry's guide on considering climate change in the environmental assessment process, 2017 the EA should highlight the following: 1. How vulnerable is the proposed project to a changing climate during its construction, operation, decommissioning, or post-closure? 2. Does the proposed project directly or indirectly contribute to the vulnerability or resilience of surrounding ecosystems to climate change? 3. Are there potential impacts that climate change may exert on the proposed project that may pose a risk to the environment? While not specific to this project or site location, the following provincial assessment reports will be of interest to consider: 1. Ontario; Chapter 3 in Canada in a Changing Climate: Regional Perspectives Report, (ed.) F.J. Warren, N. Lulham, D.L. Dupuis and D.S. Lemmen; Government of Canada, Ottawa, Ontario Chapter 3 — Regional Perspectives Report (changingclimate.ca) 2. Ontario's Provincial Climate Change Impact Assessment Report Ontario Provincial Climate Change Impact Assessment | ontario.ca Would also recommend that the proponent consider using regional climate data, including Ontario's Climate Data Portal (along with other sources of climate data) available	design for all potential conditions. No significant environmental risks have been identified related to climate change.	

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through the Climate Risk Institute's website here: https://climateriskinstitute.ca/climate-data/.		
Page 226, Section 8.3 Contingency Measures. This section discusses: "The development of contingency measures acknowledges that there is a degree of uncertainty in estimating potential net impacts and that unexpected effects could occur. A contingency plan is required by O.Reg. 232/98 and defined as "an organized set of procedures for identifying and reacting to an unexpected, but possible occurrence" (MECP, 2012). The contingency plan consists of a predictive monitoring program, establishing trigger levels for investigation and response and a description of potential contingency measures. Summarized below are proposed contingency measures related to groundwater quality, surface water quality and landfill gas management." Comment: Consider the degree to which there is potential for the effects of climate change to contribute to potential impacts on the environment, and on the landfill. Consider whether or not climate change impacts should be built into contingency planning for the project.	As noted above and based on historical performance during severe weather events the landfill site is expected to be quite resilient during extreme weather events. This project is not particularly sensitive to climate change the potential impacts of climate change will be considered with all infrastructure elements at the time of detail design. Mitigation and controls will also be considered during the construction phase (eg. temporary erosion control measures). Contingencies can be considered in the design it is also important to recognize that it is not cost effective or practical to design for all potential conditions. No significant environmental risks have been identified related to climate change.	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Page 231, Table 8.2: Table of Commitments to Mitigation and Monitoring EA. The section on climate change in this table explains the following: "Proceeding with site expansion rather than a greenfield development. Stormwater will be directed to lined stormwater management (SWM) ponds designed for the 1:100 year storm event. Move forward with an electricity generation project using collected landfill gas if suitable incentives become available to support the business case. Staged expansion of the landfill gas management system.	The references related to landfill gas collection and organics collection are targeting the reduction of greenhouse gases and climate change rather than adapting to climate change. The future design and construction of the replacement buildings on-site will also consider climate change mitigation at the time of their design which is more than a decade into the future. The specific measures related to climate change adaptation and incorporated in the report include	Adaptation and Resilience Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Implement a residential organics collection and processing program and processing of biosolids for a beneficial use in lieu of disposal in the working face." Comment: apart from the clear reference to consideration of the impacts of climate change in the design of a stormwater management for the 100 year storm event, the other content is not clear in terms of how it considers climate change in mitigation and monitoring plans. Consider including a clearer description of how climate change is considered in mitigation and monitoring plans.	consideration of storm intensities, quantities of stormwater to be managed and protection against erosion. The City is committed to considering and implementing other reasonable and practical measures throughout the operating life of the landfill. This project includes site development/ construction of site infrastructure that will span multiple decades during which time climate change mitigation and adaptation measures will likely evolve and change. The potential impacts of climate change will be considered with all infrastructure elements at the time of detail design and will also be considered during the construction phase (eg. temporary erosion control measures). Contingencies can be considered in the design it is also important to recognize that it is not cost effective or practical to design for all potential conditions.	
Ministry of the Environment Conservation and Parks (MECP)- Climate Change Policy Branch		
EA, Appendix M, Air Quality, 4.1, p.g. 48. LFG collection system efficiency of 75% listed as taken from EPA modeling to account for emissions. It is shown in the document that fugitive methane emissions comprise vast majority of landfill emissions. Suggestion to develop a landfill-specific estimate of LFG collection system efficiency and an estimate for how this might change with landfill site expansion. Suggestion to provide options for improving system collection efficiency / reducing fugitive LFG emissions.	The assessment was complete with a typical LFG collection efficiency of 75% to demonstrate compliance with air quality. It is noted that further design and operational considerations with respect to the LFG collection system will be reviewed and if necessary, addressed during the ECA application process for the Landfill.	Climate Change Policy Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
EA, Appendix M, Air Quality, Table D-1, p.g. 92. Methane concentration in LFG listed at 50%. In previous years a concentration of 40-45% has been entered in annual Landfill Gas Collection Forms. Suggest adjusting methane concentration rates to reflect actual operations/observations at the landfill.	Landfill gas methane concentration is conservatively estimated based on the default LandGEM methane content and the rated methane content in ECA (Air) No. 4306-7ZHPR3 dated April 30, 2010.	Climate Change Policy Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Ministry of the Environment Conservation and Parks (MECP)- Source Protection Branch		
Consultation with SSMRCA detailed in memo sent to Ministry. Now included in EA report update. No action required.	Acknowledged, no changes required.	Source Protection Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 7, table 7.3, p. 153. Mitigation measures for non-municipal water wells considered, including a comprehensive water well monitoring program and possible extension of municipal water well services. No action required.	Acknowledged, no changes required.	Source Protection Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been

Summary of Comments	Proponents' Response	Status
		addressed.
Site expansion located in SGRA, not in a WHPA, ICA, or other vulnerable area. Not a significant DW threat. No action required.	Acknowledged, no changes required.	Source Protection Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Appendix E, s.2.3, p.13. SPP Policy (SSM-SGRA-F-4.0) referencing municipal waste disposal sites as a moderate threat within SGRA is no longer in effect as of 2018. Update language referencing policies.	This change is acknowledged.	Source Protection Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Ministry of the Environment Conservation and Parks (MECP)- Species at Risk Branch		
Section 3.2, page 3 *Field Studies* Species at Risk and their habitat are protected under Sections 9 and 10 of the Endangered Species Act (2007). Field studies for Species at Risk (SAR) are reported as general for vegetation and are not species specific for SAR breeding birds, bats or reptiles. If no surveys have been	A SAR screening will be undertaken, as appropriate, at each future landfill development phase preliminary/detail design stage to identify the potential for Endangered and Threatened SAR with habitat that could be affected by the proposed works. The screening(s) will include the current status under the ESA, 2007 and identify potential habitats for SAR	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment.

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completed, then MECP SARB cannot assess impacts the project activities may have on species at risk (SAR) or their habitat. As per Table 2, Ecological Land Classification indicates SAR habitat has been described for several species of breeding birds and bats. ELC classifications outlined in Table 2 including FODM5-1, FODM5-3, FOMM2 may support maternity roosting habitat for SAR bats and breeding birds. MEGM3 is a graminoid meadow that may support nesting Bobolink or Eastern Meadowlark. MEGM3 and MEFM1 may provide suitable foraging and nesting habitat for the Short-eared Owl. Table 4 indicates two SAR turtles may be present, one of which (Wood Turtle) receives regulated habitat protection if found within 500 meters of the site. If the proposed project activities may cause adverse impacts to wood turtle or wood turtle habitat, then an authorization under the ESA (2007) may be required. MECP recommends the proponent conduct field surveys for the SAR species outlined in Table A-2 or provide sound reasons and rationale to support any statements that there will be no adverse impacts to the species and therefore no contravention to the Endangered Species Act (2007) will occur. MECP SARB recommends the proponent follow but not limit themselves to the following SAR survey protocols: • **Turtles**: MNRF Survey Protocol for Wood Turtle in Ontario (2015); MNRF Survey Protocol for Blanding's Turtle in Ontario (2015).	that require further assessment, if applicable. Recommendations for additional SAR surveys are provided in the responses below.	The ministry is satisfied this comment has been addressed.

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• **Bats**: 2022_Treed Habitats - Maternity Roost Surveys Bat Survey Standards Note 2022. • **Breeding Birds**: MNRF Draft Survey Protocol for Eastern Meadowlark (2014) Saskatchewan Survey Protocol for Short-eared Owl (2020) MNRF Draft Survey Protocol for Eastern Whip poor will in Ontario (2014). Note: other surveys may be required for SAR and it is the proponent's responsibility to screen for SAR on the site and if surveys are required, follow the recommended protocols or contact MECP at SAROntario@ontario.ca.		
Section 4.0 page 5. *Vegetation Inventory* The city of Sault Ste Marie is included in the Black Ash regulation. There is no mention of SAR plants in this inventory e.g., Black Ash? The site will need to be assessed by a qualified professional to determine if project activities will have any adverse impacts on black ash. For your awareness, I have included links to the Black Ash regulation below that include the description of a qualified professional: https://www.ontario.ca/laws/regulation/240006 https://www.ontario.ca/laws/regulation/210832 Please update the EA to include Black Ash or identify using reasons and rationale that no Black Ash will be adversely impacted by the activities associated with the proposed project.	During the preliminary/detailed design stage for each development sequence (phase), a search for Black Ash will be undertaken to map out potential occurrences of this species and other potential SAR plants. A determination of the potential impacts to Black Ash and other SAR plants observed in the field, as well as measures to avoid or mitigate these impacts and associated permitting requirements, will be addressed during the detailed design stage of the landfill expansion project.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Section 4.0, page 12, Table 4. Table 4. does not consider threatened grassland nesting birds like Eastern meadowlark, bobolink, or short-eared owl. Is there any potential for Eastern whip poor will to nest on this site? This species has not been included. SAR bats or their maternity roosting habitat has not been considered. MECP SARB recommends the proponent update this section to include Eastern Whip poor will and breeding bird habitat and SAR bat maternity roost habitat.	The SAR screening included in the Natural Heritage Impact Assessment (NHIA) identified that the open meadow areas do not meet the breeding habitat requirements for grassland birds in terms of size and other characteristics (e.g., grass to forb ratio, native grassland plant composition and anthropogenic disturbances). In addition, the area surrounding the landfill generally lacks the connecting grassland habitat in the broader landscape matrix. The current landfill activity and associated level of anthropogenic disturbance, precludes the potential for suitable habitat for Eastern Whip-poor-will in the study area. As woodland vegetation removal as proposed in the EA will not result in an impact to SAR bat species if timing windows that avoid roosting periods are implemented, a survey to confirm bat presence is not required.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 5.1, page 15, *Woodland and Meadow Vegetation Removal and Loss of Wildlife Habitat*. MECP SARB has concerns that removal of vegetation during the sensitive timing periods for breeding birds, SAR bats and reptiles may impact nesting birds, maternity roosting habitat for bats and nesting or travel corridor habitat for reptiles. Removal of habitat during this time may kill, harm or harass SAR thus contravening section 9(1) of the Endangered Species Act (ESA) *2007*. MECP SARB has concerns regarding the damage and destruction of 12.67 ha of habitat. No surveys have been	Tree and vegetation removal will be scheduled outside of the migratory bird breeding, SAR bat, and reptile seasons noted.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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completed and it is unknown if SAR breeding birds, bats or reptiles are using habitat associated with the site to carry out their life processes. As such, MECP SARB also has concerns regarding section 10(1) of the ESA (2007). Some section 9 concerns may be avoided by conducting the proposed activities outside of the SAR sensitive timing windows. Section 10 concerns will need to be addressed on a species-by-species approach and may require an authorization under the ESA (2007). MECP SARB recommends tree and vegetation removal be considered to occur outside of the breeding bird (April 15 - August 31), SAR bat (April 1 - September 30) and reptile (April 15 – October 15) sensitive timing windows. If the proponent chooses not to or cannot avoid conducting the proposed activities outside of the recommended timing windows, then an authorization under the ESA may be required.		
Section 5.1, page 15, *Loss of woodland and meadow habitat potentially used by wildlife common to this area.* Eastern Meadowlark and Bobolink may utilize meadow and grassland habitat for nesting and feeding. It is unknown how much of the meadow/grassland ELC communities will be removed, if at all? If the removal of habitat is less than 30 hectares, the proponent may be eligible for registering under an exemption to the ESA and paying into the species conservation fund. See recommendation. If the proponent has determined they are eligible for the exemption, MECP SARB recommends the proponent follow the criteria outlined in in the document *Bobolink and Eastern*	The habitat assessment identified that the open meadow areas do not meet the breeding habitat requirements for grassland birds in terms of size and other characteristics. The current landfill activity and associated level of anthropogenic disturbance further reinforce the limited potential for functional grassland habitat. Regulatory exemption options for SAR, if applicable, will be considered during the preliminary/detailed design stage for each development phase of the landfill expansion project.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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Meadowlark Habitats and Land Development, particularly section 3.0 of the document which states: The Rules, you must: • register the work and the affected species with the Ministry of Natural Resources (before work begins). • prepare and follow a habitat management plan. • create or enhance habitat, and manage that habitat. • provide a written commitment (also called an undertaking) to the Ministry of Natural Resources that says you will manage the habitat over time. • minimize effects to the protected species (e.g. put access roads outside the habitat). • avoid activities that are likely to affect habitat or the birds between May 1 – July 31 (e.g. do not excavate land or plough fields during this time). • prepare and maintain records that relate to the work and the habitat. • report sightings of rare species (and update registration documents, if needed).		
Section 5.1 page 15, Physical injury, root damage, and compaction of trees not intended for removal that may result from construction activity.	Acknowledged and noted.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further

Summary of Comments	Proponents' Response	Status
Black Ash is listed as Endangered under O.Reg 230/08. As such, the species and its habitat are protected under the ESA (2007), where threatened by Emerald Ash Borer. The Municipality of Sault Ste Marie has been identified under Schedule 1 of O.Reg. 06/27 as an area where Black Ash is protected under the ESA (2007). Although the species black ash does not appear in Table A-1, I have included the information for your awareness, should the species be encountered prior to development. MECP SARB recommends the proponent review O.Reg.6/24 and O.Reg. 7/24 to understand the protection regulation surrounding Black Ash and its habitat.		comment. The ministry is satisfied this comment has been addressed.
Section 5. Impact Assessment, Section 5.1 Page 15, Direct Impacts. Table 5. *Vegetation Removal Areas for the Preferred Landfill Expansion Option.* Table 5. identifies that there will be removal of 12.67 hectares of trees and vegetation. Only four of seven ELC communities identified in Table 2 are present in Table 5. MECP SARB has concerns regarding ELC communities MEFM1 and MEGM3 and their ability to support breeding birds (e.g., Bobolink, Eastern Meadowlark, Short-eared owl etc.). How large are these areas in hectares? MECP SARB has concerns regarding removal of bat maternity roosting habitat in ELC identified in Table 5. including communities 1,2 and 4, breeding bird habitat in ELC communities 1,2,3, 4 and the two ELC communities MEFM1 and MEGM3, that are not included in this table. We also feel that reptiles (Wood Turtle and Blanding's Turtle) be included If reptile habitat is present in any or all seven ELC communities.	The recommended wildlife timing windows will be identified in the removal drawings and on the Tree Protection Plan prepared during the preliminary/detailed design stages and adhered to during construction.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
MECP SARB recommends updating Table 5. in the EA to include all ELC communities and their area in hectares. MECP SARB recommends tree and vegetation removal to occur outside of the breeding bird (April 15 - August 31), SAR bat (April 1 - September 30) and reptile (April 15 – October 15) sensitive timing windows. If the proponent chooses not to or cannot avoid conducting the proposed activities outside of the recommended timing windows, then an authorization under the ESA may be required.		
Section 6.0, page 18. Mitigation Measures Mitigation involves the avoidance or minimization of potential landfill expansion related impacts through the application of appropriate design criteria and implementation of best management practices during site preparation, construction and operational phases of the project. MECP SARB has concerns regarding this section as it implies mitigation will be conducted following BMP's but has not completed surveys to determine which SAR may be impacted by the proposed activities and how they will avoid/mitigate and which BMP's will be followed to accommodate compliance with the Endangered Species Act (2007). MECP SARB recommends the proponent follow up on detailed mitigation and BMP's with MECP to ensure compliance with the ESA (2007).	MECP will be engaged to confirm the mitigation measures and BMPs proposed to avoid/mitigate contravention to the ESA, 2007 during the preliminary/detailed design stages.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 6.0, page 18. Mitigation Measures In situations where residual impacts are unavoidable, ecological enhancement is recommended.	Acknowledged and noted.	Species at Risk Branch has indicated that it is satisfied with the proponent's response

Summary of Comments	Proponents' Response	Status
For your awareness, in situations where residual impacts that impact SAR are unavoidable, then an authorization under the ESA may be required. For awareness only at this time. See comment # 8.		and has no further comment. The ministry is satisfied this comment has been addressed.
Section 6.0, page 18. Mitigation Measures Detailed mitigation measures will be finalized in consultation with the Sault Ste. Marie Region Conservation Authority (SSMRCA) and the City as part of the detailed design of the landfill expansion project. MECP SARB requires consultation regarding mitigation for SAR. MECP SARB recommends updating this section of the EA to include MECP SARB as an organization that will be consulted regarding detailed mitigation measures that may be required to avoid contravening the ESA (2007). If avoidance and or mitigation cannot be attained to prevent section 9(1) or 10(1) impacts to SAR then an authorization under the ESA (2007) may be required.	MECP will be consulted/engaged regarding mitigation measures proposed to avoid/mitigate contravention to the ESA, 2007 during the preliminary/detailed design stage of each phase of the landfill expansion project. The comment that an authorization under the ESA (2007) may be required should there be a high likelihood of a contravention due to residual impacts to SAR is noted.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 6.1 Page 19. Within 12 months of each stage of landfill expansion, a qualified arborist should assess the new woodland edge. Trees which are dead, in poor health, or hazardous should be removed or pruned, as determined by the arborist. Tree snags and dying trees may provide important bat roosting and bird nesting opportunities. MECP SARB encourages the proponent to maintain snag trees where possible.	Potential wildlife habitat trees that could be retained along the woodland edge will be identified on the removals drawing and Tree Protection Plan during the preliminary/detailed design stage for each development phase.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
MECP SARB would like the opportunity to discuss the possibility of leaving dead or poor health trees along the woodland edge with the proponent during the ESA process as habitat for SAR such as bats and breeding birds.		
Section 6.2 Wildlife Impact Mitigation During Construction pages 19-20. Vegetation removal should not take place during the established core breeding bird season for 9th 8th) Bird Conservation Region (BCR) Zone 12, (i.e. May to August as per the Environment Canada – Canadian Wildlife Service guidance under the federal Migratory Bird Convention Act, 1994. MECP SARB acknowledges the proponent's proposed mitigation to avoid tree and vegetation removal during the breeding bird season based on ECCC and has recommended, based on the best available science, sensitive timing periods for breeding birds, bats and reptiles. See adjacent column. MECP SARB recommends tree and vegetation removal be considered to occur outside of the breeding bird (April 15 - August 31), SAR bat (April 1 - September 30) and SAR reptiles (April 15 – October 15) sensitive timing windows. If the proponent chooses not to or cannot avoid conducting the proposed activities outside of the recommended timing windows, then an authorization under the ESA may be required.	The recommended wildlife timing windows will be identified in the removal drawings and on the Tree Protection Plan prepared during the preliminary/detailed design stages and adhered to during construction.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 6.3, page 20. Erosion and Sediment Control MECP SARB recommends the proponent maintain a minimum 30 m buffer between the proposed activities and any water feature. Impacts to Blanding's turtle and Wood	The minimum 30-metre buffer recommendation between the proposed landfill expansion area and water feature is noted. Except for stormwater connections, there will generally be a buffer of approximately 75 m from riparian areas. Exclusion	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further

Summary of Comments	Proponents' Response	Status
turtle need to be considered and avoidance/mitigation implemented to prevent contravening the ESA (2007). If the proponent has determined there is no impacts to the species or its habitat then this needs to be outlined in the report. MECP requires more information regarding impacts to these species. Recommend proponent conduct surveys and provide General Habitat Description mapping for Blanding's turtle and mapping for regulated habitat for the wood turtle as found in Section 2.0 of the Ontario Wood Turtle Recovery Strategy.	fencing and site isolation will be incorporated into the construction area detailed design drawings for the landfill expansion project. Surveys to prepare General Habitat Description mapping for Blanding's turtle and mapping for regulated habitat for the Wood Turtle as found in Section 2.0 of the Ontario Wood Turtle Recovery Strategy will be considered during the preliminary/detailed design stages.	comment. The ministry is satisfied this comment has been addressed.
Section 6.5, Page 22, Environmental Monitoring, Operations Environmental monitoring activities during operations will also include monitoring of invasive species encroachment, invasive species control (if necessary) and woodland edges. MECP SARB would like to add that if any SAR are observed on site that they are reported to the Natural Heritage Information Center (NHIC) to maintain an accurate database for Species at Risk across the province. Any SAR identified on the site should be reported to NHIC to update their records for the area. Observations of SAR can be reported to the Natural Heritage Information Centre | ontario.ca	Acknowledged and noted.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Table A-2-page A-5. For your awareness, COSEWIC reassessed Barn Swallow status and downlisted the species from threatened to a species of special concern under the Endangered Species Act (2007). As such the species and its habitat do not receive protection under the ESA.	The status of the Barn Swallow as Special Concern is noted. SAR screenings completed for preliminary/detailed design stages of future development phases will identify the updated status for SAR.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment.

Summary of Comments	Proponents' Response	Status
Please update Table A-2 of the EA to reflect the current status of the Barn Swallow as Special Concern as listed in the Species at Risk in Ontario List O.Reg 230/08 of the ESA (2007).		The ministry is satisfied this comment has been addressed.
Table A-2-page A-5 Short-eared Owl. Short eared-owl status was reassessed by COSEWIC from special concern to threatened under O.Reg. 230/08 of the ESA (2007). Although large open grassy habitats may be preferred, smaller grassy habitats in the northern parts of the species' range may be attractive as nesting sites and foraging sites for Short-eared owl. The fact that none were observed is inconclusive, as no species-specific surveys were completed for the species. Please update Table A-2 of the EA to reflect the current status of the Short-eared owl as Threatened in the Species at Risk in Ontario List O.Reg 230/08 of the ESA (2007).	The status of the Short-eared owl as Threatened is noted. SAR screenings completed for preliminary/detailed design stages of future development phases will identify the updated status for SAR.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Table A-2-page A-7 Add Tri-colored Bat, Tri-coloured bat is listed as endangered under O.Reg. 230/08 and is absent from this table. The report indicates an ELC code of FODM5-3 in Table 2. Tri-colored bats are known to use oak leaf clusters as roosting habitat and given this ELC community is present on the site, it may provide roosting habitat for this species. Please update Table A-2 of the EA to include Tri-coloured bat.	The comment acknowledging the potential for Tri-coloured bat to roost in the study area is noted. SAR screenings completed for preliminary/detailed design stages of future development phases will identify new SAR such as Tri-coloured bat that could be affected by the proposed works.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Table A-2-page A-7 Eastern Meadowlark and Bobolink. No large open grassy meadows are present in the study area. Species was not observed during site surveys.	The habitat assessment identified that the open meadow areas do not meet the breeding habitat requirements for grassland birds in terms of size and other characteristics. The current landfill activity and	Species at Risk Branch has indicated that it is satisfied with the proponent's response

Summary of Comments	Proponents' Response	Status
Although large open grassy habitats may be preferred, smaller grassy habitats in the northern parts of the species' range may be attractive as nesting sites for eastern meadowlark and bobolink. The fact that none were observed is inconclusive, as no specific surveys were completed for the species. MECP SARB recommends surveys be completed for eastern meadowlark and bobolink in ELC communities MEFM1 and MEGM3 following the MNRF Draft Survey Protocol for Eastern Meadowlark in Ontario (2014) as this survey will satisfy the requirements for detecting bobolink.	associated level of anthropogenic disturbance further reinforce the limited potential for functional grassland habitat.	and has no further comment. The ministry is satisfied this comment has been addressed.
Table A-2-page A-8. Wood Turtle may potentially occur in the vicinity of the watercourse features located adjacent to the existing landfill and proposed expansion area. Species was not observed during site investigate surveys. Wood turtles are listed as Endangered under the ESA (2007) and therefore the species and its habitat receive protection under the Act. No surveys were conducted following the MNRF Survey protocol for Wood Turtle in Ontario (2015). As such, site investigations are not sufficient for detection of wood turtle and absence of the species cannot be ruled out. MECP SARB recommends the proponent conduct surveys for the species in Canon Creek and the Root River.	Benthic invertebrate surveys were conducted in Canon Creek and the Root River for over a decade from the 1990s to late 2000s. During such time, no observations of Wood Turtles were made. Site investigations for Wood Turtle will be considered during the preliminary/detailed design stage for each development sequence (phase).	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Table A-2-page A-8. Blanding's turtle No suitable wetland habitat is present within or directly adjacent to the study area.	The pond at the north end of the site is a proposed feature. As such, Blanding's Turtle surveys will not be required.	Species at Risk Branch has indicated that it is satisfied with the proponent's response

Summary of Comments	Proponents' Response	Status
It is unclear if the ponds at the north end of the site are existing or are being developed due to the expansion. If existing, then they may provide habitat or attract Blanding's turtle to the site. No surveys were conducted following the Survey protocol for Blanding's turtle in Ontario (2015). As such, site investigations are not sufficient for detection of Blanding's turtle and absence of the species cannot be ruled out. If the ponds are being created, then monitoring of the site and reporting any occurrences to NHIC. If ponds are existing, then MECP SARB recommends the proponent carry out Blanding's turtle surveys as per the document MNRF Survey protocol for Blanding's turtle in Ontario (2015) for low density populations for waterbodies impacted by the landfill expansion.		and has no further comment. The ministry is satisfied this comment has been addressed.
It is unclear how much of the meadow/grassland ELC communities will be removed. MECP SARB requires clarification on how much (in hectares) will be removed. The client states that "the habitat assessment identified that the open meadow areas do not meet the breeding habitat requirements for grassland birds in terms of size and other characteristics". The Bobolink General Habitat Description states that "Minimum area requirements to support breeding habitat for the species have been reported to range from 5ha, to 10 and 30ha to 50 ha" and the Eastern Meadowlark General Habitat Description states that "Minimum patch area requirements to support breeding habitat for the species have been reported at 5 ha however abundance and productivity are higher in larger patches and in patches surrounded by other open habitats". Although large open grassy habitats may be preferred, smaller grassy habitats in the northern parts of the species' range may be attractive as nesting sites for eastern meadowlark and bobolink.	The forb meadow ecosite (MEFM1) is a disturbed cultural meadow vegetation community with weedy and invasive forb species (attached Figure 1). The MEFM1 meadow habitat units are too disturbed and small (i.e., <4 ha) and lack the vegetation composition to support grassland birds. The disturbance area will be determined at the next design stage.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Table 5. identifies that there will be removal of 12.67 hectares of trees and vegetation but only four of seven ELC communities identified in Table 2 are present in Table 5. MECP SARB has concerns regarding ELC communities MEFM1 and MEGM3 and their ability to support breeding birds (e.g., Bobolink, Eastern Meadowlark, Short-eared owl etc.). MECP SARB recommends updating Table 5. in the EA to include all ELC communities and their area in hectares.	These MEFM1 and MEGM3 are not suitable grassland bird habitats. MEGM3 is a small (i.e., approx. 1 ha) dry-fresh graminoid meadow ELC community outside of the proposed expansion area (see attached Figure 1). The forb meadow ecosite (MEFM1) is a disturbed cultural meadow vegetation community. The MEFM1 meadow habitat units are too disturbed and small (i.e., <4 ha) and lack the vegetation composition to support grassland birds. The disturbance area will be determined at the next design stage.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
MECP SARB believes the benthic invertebrate surveys that were conducted in Canon Creek and the Root River for over a decade from the 1990s to late 2000s is outdated and not sufficient for detection of Wood turtle and absence of the species cannot be ruled out. MECP SARB recommends the client conduct surveys for the species in Canon Creek and the Root River. The Wood turtle survey protocol can be provided at request.	Site investigations for wood turtle will be considered during the design stage.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
MECP SARB notes that the pond at the north end of the site is a proposed feature, however, we request clarification on the use of the pond. Blanding's turtles have potential to take up residence/occupy water features (such as a pond) in the future. MECP SARB recommends the installation of exclusion fencing, following the guidance in the attached document *OMNRF Reptile and Amphibian Exclusion Fencing (2016)*, outside of the active season (April 15th – October 15th) following a thorough search of the development area to confirm that there are no individuals	The proposed pond will function to improve storm water quality prior to discharge to Canon Creek. Temporary exclusion fencing designed in accordance with OMNRF Reptile and Amphibian Exclusion Fencing Guide (2016) will be included during construction to exclude turtles from the stormwater pond construction area and permanent fencing can be considered if deemed necessary.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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present on the site at the time of installation to reduce the likelihood that a member of the species may be killed, harmed, or harassed by becoming trapped within the site and contravening section 9 of the ESA (2007).		
As of November 2023, The Committee on the Status of Species at Risk in Ontario (COSSARO) assessed the following species as Endangered and recently released the report at: https://www.ontario.ca/page/2023-annual-report-committee-status-species-risk-ontario-cossaro • Eastern Red Bat (END) • Hoary Bat (END) • Silver-haired Bat (END) In addition, COSSARO assessed the following species as Special Concern: • Eastern Whip-poor-will (SC) As such, it is anticipated that the status assessment will be reflected on the Species at Risk in Ontario List (SARO List) on January 31st, 2025. Should any project activities occur after protection measures become effective which may contravene sections 9 and/or 10 for Species at Risk (SAR), the client should consider potential impacts to these species. Species that are listed as Special Concern (SC) or those that are not on the SARO list do not receive protections under the ESA, and therefore only the threatened and endangered species discussed in previous comments (including but not limited to) are afforded these protections under the ESA for the proposed project area. Please note	The MECP will be engaged during the design stage to confirm ESA permitting and approval requirements, as well as associated studies to support this process.	Species at Risk Branch has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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that for the other species mentioned above, they may be protected under other legislation such as the *Fish and Wildlife Conservation Act, 1997*. Reach out to your local MNR office if you require more information on designated special concern species and any protections they may receive. Determining impacts to species at risk or their habitat from a proposed project is client-driven, and impacts are assessed on a case-by-case basis. This means that the person carrying out an activity is responsible for determining whether SAR and/or their habitat are present on or around the site of the activity, and ultimately ensuring their actions do not contravene the ESA. If there IS evidence of species a risk and/or habitat on or around the location of your activity, and there is no applicable exemption in regulations under the ESA, the ministry recommends that you carry out the work necessary to prepare an Information Gathering Form to initiate the authorization process if necessary. This form considers all elements in your SAR screening data collection and further levels of assessment of impacts and potential to minimize adverse effects. Please visit How to get an Endangered Species Act permit or authorization | ontario.ca to obtain more information on how to get an ESA permit or authorization. Please consider in your project planning that it takes an average of 9-12 months from the submission of a complete IGF to a decision about a permit if one is needed. This considers the time required to conduct the technical review of the application as well as to carry out public and Indigenous consultation, along with factors such as project complexity, seasonal nature of field survey and data collection required, volume of applications and quality of		

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submissions. It is recommended that clients submit a complete IGF well in advance of the activity's proposed start date. Failure to submit a complete an accurate IGF with supporting rationale and not allowing adequate time for review and the issuance of any required authorizations could result in delays to the activity's anticipated start date. The ministry's position here is based on the information that has been provided to MECP SARB by the client and/or its project team. Should information not have been made available and considered in MECP's review or new information come to light that changes the conclusions made, or if on-site conditions and circumstances change so as to alter the basis for the conclusions, please contact the Species at Risk Branch as soon as possible to discuss next steps. If the client chooses not to or cannot commit to conducting project activities outside the sensitive timing periods, then an authorization under the ESA may be required. MECP SARB can provide further guidance on whether an ESA authorization will be required, following information provided by the client. If you have any further questions, please do not hesitate to contact me.		
Ministry of the Environment Conservation and Parks (MECP)- Noise Reviewer, EAB		
Vibration Assessment: the project's vibration effects should be assessed, and a discussion of the effects of vibration during the construction, operation, and decommissioning of the project should be included.	This has been an operating landfill for many years and the operations are not expected to change in any meaningful way with the proposed expansion. The City has not received any noise related complaints for over 10 years. Furthermore, the City has been actively acquiring additional buffer lands	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment.

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	since the completion of the noise assessment and four residential properties along the north side of Fifth Line adjacent to the existing western property boundary have been (ie. three already acquired) or are in the process of being acquired (one acquisition remains active) to expand the buffer lands. Potential sources of ground vibration may be associated with the operation and/or movement of non-road mobile sources such as loaders equipped with steel wheels. Most equipment operate on soft surfaces (e.g., waste piles) within the facility. Typical ground vibration associated with such sources is in close proximity of the source. Given the setback distances from potential onsite vibration sources and receptors (all over 200m from closest receptor), no off-site receptor ground vibration impact is expected during the operation, construction, and decommissioning phases. As such, a quantitative vibration assessment is not warranted.	The ministry is satisfied this comment has been addressed.
Landfilling operations: all studied receptors are located to the south of the landfill site. If there are vacant lands located north of the landfill site in which the zoning allows the future development of noise sensitive properties, then these vacant lots should be included in the noise analysis.	Receptors in various cardinal directions were identified and included in the assessment. The current assessment includes a receptor ~ 400m west of the landfill site. Assessment confirms compliance at the receptors closest to the site, hence receptors that are further away will also be compliance with respect to noise impact. The following commentary was provided by the City's Director of Planning: Aside from the developed properties on Old Goulais Bay Road, the parcels north of the landfill site have	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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	very limited development potential, especially for new sensitive uses. First, these lots are 'landlocked' and do not have frontage or direct access to a publicly owned and maintained road. As such, any future development would require some form of Planning Act application to either extend a road, create access easements and/or eliminate the frontage requirements. At that time, applications would be circulated to appropriate staff and agencies, and from a Planning perspective, it would be difficult to support any application to locate a sensitive receptor on any of these lots. Second, the parcels to the north are zoned REX and RP. The REX Zone permits pits and quarries, which are not sensitive receptors, and the RP zone is essentially a no development zone – This is in addition to the lack of frontage and no direct access. Although the current zoning permits existing lots of record in the REX zone to be developed with residential uses, as previously noted the lots are landlocked and therefore would require some form of Planning Act application prior to development. Furthermore, the City's Draft OP, which will be brought to Council for adoption later in 2024, and eventually submitted to the Province for final approval, includes a number of policies that will specifically prohibit development of sensitive receptors within proximity of the landfill, which if approved, will add another layer of protection around the landfill.	

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Pest Control Devices: MECP Publication "Noise Guidelines for Landfill Sites" includes sound level limits for pest control devices at landfill sites. Indicate whether pest control devices are utilized at this landfill site. If present, the noise impacts of these devices against the applicable sound level limits of LLM 70 dBAI / Leq(1h) 60 dBA should be assessed.	The City does not use any noise emitting pest control devices.	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Offsite Vehicles: MECP Publication "Noise Guidelines for Landfill Sites" Section 6, Section 7(2), and Section 7(4) (e) require the assessment of noise impact on individual receptors along potential offsite routes. A detailed noise assessment of the access route(s) for offsite vehicles as per the noted guideline should be included.	Fifth Line is a low volume roadway. As per the Traffic Impact Assessment, traffic volumes on Fifth Line are modest with less than 2400 vpd based on various counts dating back to 1998. In fact, the traffic volumes have decreased over time with approximately 900-1,000 vpd in the most recent counts compared to 1,400-2,300 vpd dating back to 2009 and 1998. Future increases in traffic on Fifth Line associated with the proposed landfill expansion will generally be limited to additional site visits as the City's population increases over time and construction related traffic associated with future site development activities. No significant increases are expected from waste trucks or with future land development in the vicinity of the site. The City has developed mapping illustrating potential residential and Industrial, Commercial & Institutional (IC&I) growth areas over the next 20 years and no potential development sites have been identified in the vicinity of the landfill site. Assuming that the number of visits to the site will grow in proportion to the population increases there may be in the order of 100 additional vpd on Fifth Line by 2048. In addition, there may	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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	also be an increase in traffic related to periodic site development activities (ie. construction traffic). This could result in an additional 80 vpd. The additional traffic (ie. 180 vpd) represents a modest overall increase in traffic and will still not reach the 2009/1998 traffic levels. Furthermore, this has been an active landfill with waste trucks delivering waste to this site for many years. There are no changes anticipated with haul routes and no significant increase in trucks visiting the site. The main routes leading to the site are all designated truck routes with both Fifth Line and Old Goulais Bay being Class B truck routes and Highway 17 being a Class A truck route. In closing given that no meaningful changes in truck traffic or overall traffic are anticipated with the planned expansion an assessment of noise impacts along the nearby routes is not considered warranted for the purposes of this assessment. It is also noted that there have not been any site related noise complaints or enroute to the site for at least ten years.	
Noise Control Measures: a discussion on the height of the assessed receptors regarding any proposed noise control measures (berms or other acoustic barriers) should be provided. The report should clearly indicate whether the direct line-of-site between noise sources on-site and the receptors will be interrupted by the proposed noise control feature(s), if applicable. Provide a figure clearly showing the barriers and berms necessary for the site's noise control, which were used in the computer model, including but not limited to their height	The assessment includes land topography and was completed using CANDA noise propagation model, which accounts for attenuation due to barriers / berms. The predicted receptor noise levels are reflective of all such attenuations. Electronic version of the noise model can also be provided and as such, consideration of individual receptor heights vs. source / barrier height is not considered necessary. There were no noise control features incorporated in the model as the site meets the noise criteria without	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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above ground, length and whether they meet the NPC-300 acoustic barrier requirements.	the need for any noise control features.	
Existing Noise Environment and Meteorological Conditions: Section 7(3) of the MECP "Noise Guidelines for Landfill Sites" requires a description of the existing noise environment and points of reception and prevailing meteorological conditions. Pre-expansion existing background/ambient sounds, as well as the current sound levels produced by any existing landfill operations, if applicable, should be included so as to allow an impact evaluation of the proposed expansion.	Section 2.5 of the report provides a high-level qualitative description of existing noise environment. Given the compliance status of the site with the proposed expansion, establishing current ambient noise levels through noise monitoring / modelling is not considered warranted. Prevailing meteorological conditions pertaining to wind speed and direction can be found in the air quality report.	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Sample Calculations: the project noise emissions were predicted using the CadnaA software. The CadnaA model used in this study should be provided. Provide the Cadna file used in support of the AECOM landfill noise assessment dated February 2020 (Project: 06-6988). Confirm whether this is the latest and most up-to-date noise assessment for the proposed subject landfill expansion.	Electronic version of the CADNA can be provided to the Ministry for their technical review as part of the ECA application stage. We can provide a link to the file as requested. Please provide the email address(es) for all individuals that will require access.	No further action required.
Regarding the CadnA file you've submitted, Table 6 (Project: 06-6988 – report dated February 2020) doesn't seem to match the total receptor levels shown in Cadna and in Figure 4 of the report. Could you please send us a revised Table 6 showing the correct total sound levels at the receptors? Table 2: Noise Source Summary Table, there's no PWL data for onsite route #1 & #2. I'm assuming that's because you used TNM road tool in CadnA to setup that source (i.e.	We used the TNM model in Cadna. The model doesn't generate the resulting PWL, however, when compared against a moving point source, the impact (partial level) at the nearest receptor (R1) was within a couple of dB of that of TNM and did not make a difference on the overall receptor noise level (partial levels: ~30 dBA vs ~28 dBA). Given that it is a line source, would you like to see calculation of PWL based on distance to the mid-point of the road and use of receptor partial level?	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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6 trucks per hour). Could you please figure out what is the equivalent power level used by CadnA? I'd like to see how it compares against truck power levels provided to us in other submissions.	It looks like the table numbers you have do no match with mine. Table 5 is the side-wide assessment which is compared against the 55 dBA. Table 6 is the partial level table and Table 7 is the stationary noise assessment summary table that compares the results with 40 dBA. Please see below. I hope this helps. Please let me know if you think a call would be more helpful.	
Can you please give me a status of this info that you were to provide, "Given that it is a line source, would you like to see calculation of PWL based on distance to the mid-point of the road and use of receptor partial level?"	Based on a simple calculation the PWL for the road is approx. 88 dBA.	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Provide the ministry with a figure showing which noise receptors will no longer be receptors (i.e. residences are to be destroyed or re-zoned to be converted to non-residential uses) as a result of the City's property acquisitions.	Please see the attached figure highlighting the noise receptors that have been eliminated due to the recent property acquisitions by the City.	The Noise Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Ministry of the Environment Conservation and Parks (MECP)- Wastewater Reviewer, EAB		
Reference made to the existing and proposed works in Executive Summary and in Section 7.2.3 Surface Water - Potential Effects and Mitigation on p.g. 158. There are some Storm Water Management (SWM) works exist at the site presently. ECA is required for the existing SWM works. If the City have ECA for the existing SWM works, it will need to be amended to include the proposed SWM works. If there is no existing ECA for SWM works, the City will need an OWRA ECA. That new ECA would include the existing and proposed SWM works. A separate ECA application should be submitted to the Ministry to obtain OWRA ECA for existing and proposed SWM works. The ECA application will include with SWM Plan, design reports a stamped and signed drawings.	In the next stages of the project ECA applications will be submitted for approval under the Environmental Protection Act and Ontario Water Resources Act.	The Wastewater Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
EA, p.g. 67- 68, p.g. 118, on page 68 it is stated, "For a new site this would take the form of trucking leachate to one of the City's wastewater treatment plants or an extension to the municipal waste water collection and conveyance system" and on page 68, it states that, "The proposed expansion area will include an engineered liner and leachate collection system such that leachate from the expansion area will also be collected and pumped to the City's wastewater collection system and treated in the West End Water Pollution Control Plant (WEWPCP)". There are two Sewage Treatment Plants in the City (Sault Ste. Marie East WPCP and West End WPCP), there is a discrepancy in the above statement.	The destination for leachate potentially generated at a new site would depend on the reserve capacity at the two wastewater treatment plants and the location of a new landfill. Text to be updated to confirm the landfill leachate generated from the existing and expanded landfill site will continue to be treated at the West End WPCP.	The Wastewater Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
The City should confirm to which sewage treatment plant, collected leachate would be transferred for co-treatment. According to West End Water Pollution Control Plant ECA (ECA # 5922-BZNHV3), this plant is designed to accommodate landfill leachate. But Sault Ste. Marie East WPCP (ECA # 3973-AFPTCN) is not designed to handle landfill leachate for co-treatment. Therefore, clarification is required on the landfill leachate receiving sewage treatment plant.		
Ministry of the Environment Conservation and Parks (MECP)- Air Quality Reviewer, EAB)		
Table 2, Section 2.4, Appendix M, for sulfur dioxide, the 10-min background concentration is the same as the 1-hour background concentration (2.6 µg/m^3) and lower than the 24-hour concentration (5.3 µg/m^3). Please double-check, confirm these concentrations and correct them if needed. Please add a note to the report to indicate that 1-hr SO_2 background concentration was used as 10-min SO_2 background concentration as well since no 10-min data are available.	The concentrations provided from the air monitoring stations were taken on an hourly basis. Therefore, the shortest averaging period available to assess background concentrations is 1-hr. As the concentrations are based on measured data, and not modelled data, a conversion factor for adjusted averaging periods was not deemed to be appropriate at the time of report preparation. Therefore, it was assumed that the 1-hr and 10-minute concentrations would be represented by the same values. As the predicted impact of 10-min SO_2 resulted in a cumulative concentration 1.8% of the applicable criteria, a change to a more conservative (1.65 x) background concentration would not be impactful from a compliance perspective.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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Table 3, Section 2.5, Appendix M, the ministry has an updated ambient air quality criteria (AAQC) for SO_2 and $PM_{2.5}$: AMBIENT AIR QUALITY CRITERIA (ontario.ca). Please correct Table 3 based on the updated AAQCs and standards. It should be noted that AAQC are used for environmental assessments, but standards and guidelines are used for ECAs. By the way, the new 1-hr and annual SO_2 standards are the same as the updated SO2 AAQC but with different units.	The updated AAQC are acknowledged and will be used for the ECA. The 1-hr, and annual SO_2 AAQC concentrations used in the assessment are more conservative than the new AAQCs. The 10-min SO_2 AAQC decreased by ~1% which will not impact compliance. The 24-hr and annual $PM_{2.5}$ AAQCs have been updated based on the CAAQS. The more conservative CAAQS were used for assessing compliance in the assessment.	
Section 2.6.1.1, Appendix M, eight future operational scenarios were discussed and the development of cells 4-7 was not considered to be a worst-case operation due to less vehicle activity and travel distances based on the information from the report. It also states that a screening assessment was completed to determine the worst-case operating scenario. In addition to the emissions, source locations including active working face and storage piles also impact the results of the assessment as all receptors are located at the southeast, south, southwest and west of the landfill property. It is unclear whether source locations were also considered during the screening assessment. Include cells 4-7 in the future operational scenarios and provide more detailed information to support the assumption that Scenario 2 is the worst-case operating scenario. Locations of cells/active working face and storage piles (distance between receptors and working face/storage piles) should also be considered during the screening assessment. Also, provide a map showing the locations of all 7 cells.	From a potential air quality impact perspective, the first three cells were determined to be the most critical as the development of these cells includes significant activity i.e. landfilling, landfill base preparation, and landfill mining. Landfilling and base preparation are consistent activities throughout most of the life of the expansion and landfill mining is anticipated to add new operating activities. In addition, the amount of waste movements during the 'mining' years are anticipated to be approximately three times higher than that of the normal operating periods when Cells 4 through 7 are in operation. A map showing the locations of all 7 cells and the detailed landfill development sequencing is included in the site's Design and Operations Report. In addition, since the air quality assessment was completed some time ago, the City has acquired residential properties along Fifth Line immediately	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
	south-west of the proposed footprint expansion. The City has identified four residential properties to be acquired to enhance buffer lands to the southwest. They have successfully acquired three of the four properties and the fourth is currently being expropriated. With these acquisitions discrete receptors R1 through R4 inclusive included in Figure 5.2 will effectively be eliminated.	
Appendix A of Appendix M, sample calculations should be provided to verify the emission rate estimates. Provide sample calculations for emission rate estimates.	All the information that would facilitate a sample calculation or re-calculation of emissions (i.e. methodology, equations, and parameters) are included in the report. Section 2.6.2 Emission Rate Estimation of the assessment provides explanation of methodologies and equations used in the calculation of emissions. The calculation workbook provided as Attachment A – Air Quality Impact Calculations provides all additional parameters used in the emission rate estimates.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 2.6.2 and Appendix A of Appendix M, data quality ratings were not provided for emission estimate calculations. Provide data quality ratings for emission estimate calculations. Provide data quality ratings for emission estimate calculations during ECA application.	All emission rate calculations were conservatively estimated based on manufacturer data, emission factors, and MOVES results. Although data quality ratings will not impact the conclusions of the assessment data quality ratings for emission estimate calculations can be provided if deemed necessary.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Table A.7, Appendix A of Appendix M, natural mitigation through precipitation days and reduction due to mitigation measures were both applied to estimate 24-hour fugitive dust emission rates for on-road and off-road equipment. It should be noted that natural mitigation through precipitation is used to estimate the annual emission rate instead of the short-term (hourly or 24-hour) emission rate based on the US EPA AP-42. It is not reasonable to include natural mitigation when estimating 24-hour emission rates. Natural mitigation through precipitation days should not be included in the short-term emission rate estimates. As mentioned in the previous comment, natural mitigation should not be included in the estimates of 1-hr and 24-hr emissions. The cumulative 24-hr POI PM concentrations (modelled plus background) may be close to or above the applicable criteria when removing natural mitigation based on the modelled results for the compliance assessment.	Modeling in report showed that the site is at 30-40% of the 24-hour fugitive dust emission limits (TSP, PM10, PM2.5). Based on our experience, while removing natural mitigation may increase the 24-hr dust emissions; there is confidence that the impact would be less than 80% of the respective dust criteria and the stie would continue to remain in compliance. Based on the foregoing, the required effort, time and cost of removing natural mitigation and remodeling will not be impactful to the study results. Fugitive dust is expected to be effectively managed through the sites BMPP, as it is today. The BMPP will be reviewed and updated during the ECA process. Just for clarity, our AQ team has indicated that the Modeling showed that the site is at 30-40% of the 24-hour fugitive dust emission limit. Based on our experience, while removing natural mitigation may increase the annual dust emissions; it is anticipated to remain in compliance with applicable criteria. Fugitive dust is expected to be effectively managed through the sites BMPP, as it is today. The BMPP will be reviewed and updated during the ECA process. Therefore, we believe that the air quality modeling and compliance assessment is adequate for the EA stage and if there is any further technical work required in relation to dust emissions it will be completed at the ECA stage.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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Table A.7, Appendix A of Appendix M, the total 24-hour emission rate for Source ID U9-10 should be the sum of emissions from waste trucks, mining trucks and soil cover trucks. Correct Table A.7 with the sum of the emissions from waste trucks, mining trucks and soil cover trucks.	We acknowledge this minor error and note that it represents approximately 1% of total emissions. Based on experience, this difference is not anticipated to result in a substantive change to the results, there is a high-level of confidence that the predicted impact will remain in compliance with criteria.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Table A.7, Appendix A of Appendix M, particulate emission rates from the re-suspension of road dust on paved roads were estimated based on the emission factors derived from US EPA AP-42 Chapter 13.2.1. It should be noted that Equation 1 from Chapter 13.2.1 is not intended to be used to calculate a separate emission factor for each vehicle weight class based on the information from US EPA AP-42 Chapter 13.2.1. It appears the emissions were calculated for each vehicle weight class based on the information from Table A.7. This may or may not affect the total emission estimates. Please verify that the separate calculation for each vehicle weight class does not affect the total emission estimate for each source.	Dillon reviewed the values presented within the Report and confirmed that the use of separate emission factors represents a conservative emission rate calculation for all sources.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Section 4.0, Appendix D and Appendix E of Appendix M, it appears the Global Warming Potential (GWP) of 25 was used to calculate the carbon dioxide equivalent (CO2 eq) for methane (CH4) emissions although no detailed calculations were provided. Please note that the GWP for CH4 should be 28 based on the Fifth Assessment Report from the Intergovernmental Panel on Climate Change (IPCC).	Canada did not adopt the IPCC's Fifth Assessment Report GWP's until the Greenhouse Gas reporting notice in the Canada Gazette "Notice with respect to reporting of greenhouse gases (GHGs) for 2022 and 2023" dated January 28, 2023. This was after the issuing of the Sault Ste Marie Air Quality report. The change in the GWPs would not have a	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied

Summary of Comments	Proponents' Response	Status
Please add more detailed calculations of greenhouse gas (GHG) emissions to the report and use the GWPs from the IPCC's Fifth Assessment Report to calculate the greenhouse gas (GHG) emissions.	significant/material impact to the conclusion of the GHG assessment. The calculation workbooks provided as Attachment D, E, and F provides additional information used in the GHG emission rate estimates.	this comment has been addressed.
It was noted that the maximum POI concentrations shown in Table 8 for environmental assessment were significant lower compared to those shown in Table 11 for compliance assessment, even though the emission rates are the same for both. Usually, the modelled maximum POI concentrations for the environmental assessment are higher or at least equal to those for compliance assessment as all the sources should be included in the environment assessment. The modelled maximum POI concentrations for environmental assessment and compliance assessment should be the same for this case as emission rates are the same as mentioned before. Please clarify this discrepancy. The cumulative 24-hr POI PM concentrations (modelled plus background) may be close to or above the applicable criteria when removing natural mitigation based on the modelled results for the compliance assessment.	The maximum POI concentrations shown in Table 8 for the environmental assessment were typically lower than those shown in Table 11 for the compliance assessment. The compliance assessment addresses impact relative to the MECP grid (property boundary and MECP approved receptor spacing), whereas the environmental assessment was completed using sensitive/discrete receptors (e.g. homes) which are typically located further away. The compliance assessment was completed to the property boundary and MECP-approved grid, demonstrating the site's ability to comply with O.Reg. 419/05 in advance of applying for an ECA. It is not anticipated that a cumulative assessment (POI plus background) will be required to demonstrate compliance along the property boundary under an ECA application. As indicated below, fugitive dust is expected to be effectively managed through the site's BMPP. This BMPP will be reviewed and updated during the ECA process.	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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For the environmental assessment, in addition to the maximum predicted cumulative concentrations at discrete receptors (special receptors), the maximum cumulative concentrations at the modelled property boundary should also be presented. For the discrete receptors, Figure 6 should include receptor #, which will facilitate readers to identify locations of the predicted exceedances. The predicted maximum cumulative 24-hr PM concentrations at the modelled property boundary may be close to or above the applicable criteria when removing natural mitigation.	As noted in our previous response, the maximum cumulative concentrations at the property boundary have not been presented in the environmental effects assessment. The environmental effects assessment focuses on the potential impact of the site's operations with the addition of background air quality on sensitive receptors. This predicted worst-case cumulative impact demonstrates the potential for adverse effects in areas where human activity is likely to occur. The compliance assessment was completed using the MECP-approved grid (including property boundary) and was provided for the sole purpose of demonstrating the site's ability to comply with O.Reg. 419/05 in advance of applying for an ECA. The ECA approval process does not require a cumulative effects assessment at the property line or sensitive receptors. Additionally, as indicated in Section 7.4 of the MECP's Guideline A-10 (ESDM Procedure Document), in many cases, the most appropriate manner in which to manage POI concentrations from fugitive dust sources (e.g. on-site roadways) is through an effective BMPP. As required, the sensitive uses (receptors) have been assessed under the environmental effects assessment. As there are no sensitive uses along the property boundary (i.e., impact not likely to pose health risk to humans), and a compliance-level assessment at the property boundary (and MECP-approved grid) is also presented, it is not anticipated that a cumulative effects assessment (POI plus background AQ) is required at the property boundary	The Air Quality Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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	from either an environmental effects or compliance-level assessment perspective. While Figure 6 does not include receptor #s, any individual sensitive receptor results predicted and included in the report are provided alongside UTM coordinates. It is recommended that an update to Figure 6 not be required at this time.	
Ministry of the Environment Conservation and Parks (MECP)- Groundwater Reviewer		
Sault Ste. Marie Solid Waste Management Environmental Assessment Final- Table 8.2 Re. Presence of multiple residences using individual water wells hydraulically downgradient (south and southwest) of the site. Emerging groundwater contaminants of concern are not currently included in Table 1 of the Landfilling Sites Regulation or Schedule 5 of the Landfill Standards Guideline, and consequently do not appear to be considered in the EA in any great detail. Such contaminants of concern include but are not limited to Per- and Polyfluorinated Substances (PFAS). PFAS are environmentally persistent and mobile artificial chemicals having the potential to affect human health if consumed. Safe concentrations of various PFAS in drinking water are currently subject to ongoing development. Future regulatory limits for PFAS in ground water that might be imposed upon	For items 1 to 2, PFAS monitoring will be added to the target parameter list for leachate, residential water well testing and the existing and future groundwater monitoring network / program to be included with the site ECA. For item 3, the provision of an alternative water source, which is already a proposed contingency measure, will be included as an explicit contingency measure if PFAS impacts are detected in residential wells. The endorsements of the proposed leachate collection system, the acquisition of additional properties, and the extension of municipal water supply along Fifth Line Road are acknowledged. PFAS mitigation will be explicitly addressed in the design and modelling of the liner system at the ECA submission stage. The contingency of extending the municipal water	The Groundwater Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
the landfill operators may be exceptionally stringent (i.e., nanograms per litre) Recent provincial PFAS surveys (post 2020) found that these substances were widespread on landfill leachates across Ontario. The PFAS survey findings post-date development of the EA's TOR and the Ministry's initial Draft EA comments. Nevertheless, the implications should be contemplated, as it concerns the compatibility of individual water well supplies in proximity to landfills beyond the typically assumed 500 metre effect radius. The magnitude and extent of any existing PFAS-impacted groundwater emanating from the Sault Ste. Marie Landfill does not appear to have been fully delineated at this time. To my knowledge, the effectiveness of the proposed landfill liner system design for the containment of emerging contaminants such as PFAS has not been modelled. Landfill liner design might not be optimized to address PFAS containment during the landfill's contaminating lifespan. Similarly, the effectiveness of the city's wastewater treatment plants with respect to removal of PFAS from leachate and wastewater remains an unknown. Notwithstanding the finalization of the EA's terms of reference several years ago, these recent and emerging issues have the potential to affect human health and the natural environment and should be contemplated at this juncture. I recommend the following:	services along Fifth Line Road to the east of the landfill, will occur based on the results of the ongoing water quality monitoring program. Currently, water quality east of the site is good and no significant plumes in the east have been identified. With the westward expansion of the landfill, there is no expectation that there will be a change in the water quality on the eastern part of the site.	

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1.That the proponents commit to characterizing the PFAS content of leachate generated by the Sault Ste. Marie municipal waste stream. 2. That the applicant commits to including PFAS sampling and analysis as part of the proposed residential water well monitoring program and incorporation of routine PFAS monitoring within the landfill site's existing and future groundwater monitoring network / program. 3. In addition to any other typical leachate constituent, should PFAS impacts be detected in residential well water that exceed drinking water quality guidelines (currently under development, and likely to be on the order of nanograms per litre), the site owners should commit to the provision of an alternate water source. I endorse the municipality's initiative to not expand the landfill further without the construction of effective leachate collection measures. I endorse the municipality's initiative to acquire the properties along Fifth Line Road between Old Goulais Bay Road and Trans-Canada Highway 17. I endorse the municipality's proposal to extend municipal water services along Fifth Line Road to the east of the landfill. Such contingency infrastructure may eventually prove vital for the protection of human health and should be emplaced at the earliest practical opportunity. **Non-groundwater suggestion**: That the proponents commit to evaluating and verifying the proposed landfill liner system's effectiveness for preventing PFAS diffusion and		

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contamination of the subsurface. As landfill liners are an engineered feature, this evaluation may require review by a qualified Ministry engineer. References: Diffusion and partitioning of different PFAS compounds through thermoplastic polyurethane and three different PVC-EIA liners - ScienceDirect. Modelling the transport of PFOS from single lined municipal solid waste landfill - ScienceDirect. **Non-groundwater suggestion**: That the proponents commit to evaluating the effectiveness of the city's wastewater treatment plants with respect to removal of landfill PFAS prior to discharge to the natural environment. As the wastewater treatment plants are engineered systems, this evaluation may require review by a qualified Ministry engineer.		
Statement of Limitations The purpose of the preceding review is to provide advice to the Ministry of the Environment, Conservation and Parks regarding subsurface conditions based on a review of the information provided in the above-referenced documents. The conclusions, opinions and recommendations of the reviewer are based on information provided by others, except where otherwise noted. The Ministry cannot guarantee that the information that is provided by others is accurate or complete. A lack of specific comment by the reviewer is not to be construed as endorsing the content or views expressed in the reviewed material.	Acknowledged and noted.	The Groundwater Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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The proponent appears to have satisfactorily addressed much of my original commentary. These comments were largely centered around the emerging family of contaminants of concern in landfill leachate known as Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS). With respect to the municipality's proposal to extend municipal water services along Fifth Line Road to the east of the landfill (which I endorse), The consultant states that this will occur based on the results of the ongoing water quality monitoring program. This is satisfactory. The consultant states that current water quality east of the site is good and there is no expectation that there will be a change in the water quality on the eastern part of the site. Based upon current site knowledge, this statement is not incorrect. However, no PFAS sampling campaign appears to have been undertaken yet. I cannot discount the possibility that PFAS impacts from the legacy fill area might exist in groundwater east of the site. Low concentrations of other traditional leachate-tracing substances in groundwater do not negate this possibility. This is not an objection but rather a point of clarification, as the municipality's commitment to extend water services as a contingency seems clear.	The proposed mitigation and contingency measures documented in the EA are adequate and we assume no further actions are required from a groundwater quality management perspective. It is our understanding that the groundwater monitoring program will be vetted further and finalized at the ECA stage.	The Groundwater Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Ministry of the Environment Conservation and Parks (MECP)- Surface Water Reviewer		
The evaluation and response from consultation concluded the preferred site expansion consists of a modest increase	At the time of the submission of the DRAFT EA, several years ago, a modest change in the height of	The Surface Water Reviewer has indicated

Summary of Comments	Proponents' Response	Status
in the height of the waste, an expansion of the disposal footprint to the west and north and mining a portion of the existing waste to enhance groundwater quality.	the landfill mass was proposed. Since that time the increase in the height of the landfill mound has been eliminated which was done to satisfy comments provided by the Ministry on the Draft EA. It is noted several times throughout the EA that the landfill maximum height would remain at 310 m ASL (i.e., no change in existing height). This is noted in the EA in the Executive Summary and Sections 1.3, 5.2.2, 5.2.2.3, 6.2, and 9.4.4.	that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
The City completed a capacity assessment of the West End Water Pollution Control Plant in 2022 which receives the leachate from the landfill. Through that assessment it was confirmed that the plant has adequate capacity to support the projected growth in the catchment area to at least 2038. Since the landfill expansion is expected to extend the life of the landfill until 2049, some details on the plans for leachate disposal between 2038 and 2049 should be provided in the EA. Table 8.2: Table of Commitments should be updated to address this recommendation.	Sault Ste. Marie's historical population dating back to 1981 is provided in the above table. In general, there have been modest population changes and a gradual erosion of the population over time. The City is currently projecting modest future population growth which was incorporated into the most recent WEWPCP capacity assessment completed in 2022. It is noted within the EA that the WEWPCP has adequate capacity to accommodate the modest increase in leachate from the landfill expansion, together with the projected population increase to 2038. It is not practical to forecast population growth beyond 25 years. The City continually updates population projections and assesses its infrastructure needs which will continue in the future. If and when appropriate the City will initiate the planning and design of a wastewater treatment plant expansion or implement other infrastructure upgrades as necessary to accommodate growth. If desired, Table 8.2 can be updated to reflect the City's commitment to regularly assess its wastewater treatment infrastructure needs and increase capacity	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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	as appropriate to accommodate future growth.	
It is recommended that backup emergency power for this pump station be included in the design.	The City regularly assesses it's infrastructure needs through its asset management planning program. The landfill pump station is reaching the end of its useful service life and is in need of upgrades. The City is currently undertaking a study to define the scope of the upgrades and is assessing provisions for emergency backup power at this pump station.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Long term stormwater management infrastructure should be designed to the 100 year storm. It is recommended that the design be updated at the provincial approvals stage and that the commitments table (Table 8.2) is updated to address this recommendation.	The proposed site stormwater management ponds have been designed to accommodate the 1:100 year storm and the landfill perimeter or roadside ditches are part of the minor drainage system. Excerpts from the City's stormwater management guidelines (7.4.3 Roadway Ditches and 4.8.1 Minor System) are included below for reference: 7.4.3 Roadway Ditches: • Roadway ditches shall be designed as an open channel with maximum side slopes of 2 horizontal to 1 vertical. • Ditches shall be designed with adequate capacity to carry the expected flow from either the minor storm (10-year storm) or major storm (the 100-year return period storm and Timmins Storm) based upon the use of the ditch. • The minimum grade of a roadside ditch shall be 0.5% unless otherwise approved by the Commissioner of Engineering and Planning. • The maximum velocity in an unlined ditch shall	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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	be in accordance with Table 7.1. • Culverts located in major drainage courses or natural watercourses are to be a minimum size of 600 mm and be designed to accommodate the major design storm (the 100-year return period storm), and the Timmins Storm unless otherwise directed by the City. 4.8.1 Minor System: • For urban areas, the minor system is composed of lot grades, ditches, backyard swales, roof leaders, foundation drains, gutters, catch basins, and storm sewers. Traditionally, minor systems have been designed to reduce the inconvenience to the public from runoff events. The proposed roadside perimeter ditches within the site are part of the minor stormwater drainage system and will be designed accordingly. We will include a commitment in Table 8.2 to further review the stormwater management design criteria at the preliminary and detail design stage.	
In addition, consideration must be given to stormwater management during construction. I recommend that the ECA include monitoring requirements during the construction phase; the commitments table (Table 8.2) should be updated to address this recommendation.	Table 8.2 will be updated to include a commitment to ensure the future site development contracts include performance specifications related to stormwater management during construction. Contractors will be required to develop and submit for approval, storm water management plans that meet specific performance requirements. The City will have construction inspection staff on-site throughout the construction timeline who will be responsible for, amongst other things, monitoring stormwater management and protection of downstream water	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

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	quality.	
There are potential risks of encountering seeps during the pilot project as well as the formal landfill mining work. This should be considered as any water encountered during the landfill mining would be considered leachate and should be treated accordingly. It is recommended that this drainage management approach be applied during landfill mining activities, as any water/drainage from uncovered areas must be managed as leachate. The commitments table (Table 8.2) should be updated to address this recommendation.	It is recognized and understood that stormwater which comes into contact with waste must be managed as leachate. Landfill mining will be procured through a third-party contract. The contract will be developed to include performance specifications and provisions related to stormwater management that enters the mining area and will specifically highlight the need to minimize the quantity of stormwater entering the mining area and manage it as leachate. This will be added to Table 8.2.	The Environmental Assessment Branch reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
The proposed surface water monitoring program appears acceptable for the purpose of the EA. A more detailed review of the monitoring plan will be conducted by the ministry at the provincial approvals stage (i.e., ECA).	Acknowledged that further review of the proposed surface water monitoring program will be completed at the time of the ECA application submission.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Table 7.4 in this final EA includes the commitment for annual monitoring of SWMP influent and effluent, it does not indicate that the discharge valves can be closed if parameter concentrations are unacceptably high. Nor has this commitment been included in of the commitments table (Table 8.2). It is recommended that this be clarified, and the commitments table be updated accordingly.	The operation of the emergency shutoff valves is included in the Surface Water Impact Assessment (see p.14, 17 and 20 of Appendix F) and we will incorporate in Table 8.2.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been

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		addressed.
The trigger value for unionized ammonia is based on USEPA toxicological values. In Ontario we generally do not accept USEPA criteria as they are derived differently than the method accepted in Ontario. The PWQO for unionized ammonia is 0.02 mg/L and considering the safety factor applied to derive the PWQOs (typically a factor of 10x to the lowest effect level concentration), the accepted toxicity threshold for unionized ammonia is generally 0.2 mg/L. The trigger should be at or below this level to ensure the discharge is non-toxic.	The trigger value will be modified from 0.24 mg/L to 0.2 mg/L for unionized ammonia as requested.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Discharge criteria for the SWMP will also need to consider total phosphorus concentrations in the receiver. More detailed monitoring and trigger plans will be developed at the provincial approvals stage (i.e., ECA).	Acknowledged and agreed as the plan presented in the EA is preliminary and will be flushed out further at the ECA application stage.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
In addition, the ponds will be designed to have bottom draw characteristics and will include landscaping to shade the ponds. In the review of the previous version of the EA by the MECP, it was noted that in the application for an ECA these impacts, and anticipated effects of the mitigation measures should be quantified, and analysis provided to show that the proposed measures are sufficient to allow for discharge without unacceptable impacts to the receiver. These remain the MECPs expectations, and these details will be required at the provincial approvals stage (i.e., ECA).	Acknowledged and the additional details requested will be provided at the approvals stage.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Regarding your response dated July 3, 2024, response #2 - The EA states that the West End Water Pollution Control Plant (WEWPCP) has sufficient design capacity to accommodate the increase in leachate production resulting from the proposed landfill expansion and the increase in municipal wastewater from the growing serviced population until 2038. It is still recommended that details regarding the plan for leachate disposal between 2038 and 2049 be provided in the EA or a commitment be added to Table 8.2 for an additional assessment to be completed during the permitting phase to meet the intentions of Ontario Regulation 232/98 s.11. Additionally, during the provincial approvals phase should the EA be approved, it is recommended that an Environmental Compliance Approval (ECA) condition be developed that details the requirement for an annual assessment of leachate quantity and quality directed to the WEWPCP relative to the amount of available capacity.	The City plans to continue to treat leachate flows from 2038 to 2049 at the City's West End Water Pollution Plant (WEWPCP). The City has an asset management plan and undertakes supplementary studies as necessary (eg. Wastewater Master Plan) to ensure the capacity of its infrastructure is adequate to meet the needs of the Municipality on an ongoing basis. The plant capacity assessment that was recently completed as an integral component of the Wastewater Master Plan included a detailed assessment of plant capacity versus future needs. The City has been and will continue to assess plant capacity, leachate quality and leachate quantities on an annual basis as part of its annual reporting obligations for the WEWPCP and landfill site.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Regarding your response dated July 3, 2024, response #3 - It is still recommended that the design for the replacement pump station include an emergency backup power source in the design. It is recommended that the emergency backup power source be included and detailed in the refined stormwater management plan.	The City will incorporate emergency backup power in the design of the sewage pumping station upgrades as requested and this will be addressed at the permitting stage.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Regarding your response dated July 3, 2024, response #4 - Any water conveyance and ditching systems should be	The project design has been developed to a conceptual level of design and it is acknowledged	The Surface Water Reviewer has indicated

Summary of Comments	Proponents' Response	Status
designed to be consistent with the MECP's Landfill Standards. I agree that refinement of the stormwater management plan (including sewage work components) should be added as a commitment in Table 8.2; it is recommended that this plan demonstrate how divergences from MECP's Landfill Standards will still minimize erosion on site and meet the intentions of the Landfill Standards. Should the EA be approved, the engineered design of the structures will need to be reviewed by an MECP Approvals Engineer during the provincial approvals phase. More details can be found in Landfill Standards; Table 9: Surface Water Control.	and agreed that the surface water management features will be designed in accordance with the landfill standards and divergences from the standards will be addressed at that time and reviewed by MECP technical approvers.	that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Regarding your response dated July 3, 2024, response #5 - The response is noted. The recommendation for including construction phase surface water monitoring requirements in the ECA is still recommended. As a point of clarification, complying with ECA conditions is the responsibility of the ECA holder. The addition to Table 8.2 should be regarding the commitment to monitor surface water during site development, the details of which will be refined during the provincial approvals phase should the EA be approved.	It is acknowledged and agreed that surface water monitoring during site development will be incorporated in the ECA and be a responsibility of the City.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Regarding your response dated July 3, 2024, response #6 - As a point of clarification, it is recommended that the commitment in Table 8.2, apply to any water encountered during landfill mining activities. The details of monitoring and associated adaptive management measures will be refined during the provincial approvals phase should the EA be approved.	It is acknowledged and agreed that water encountered during landfill mining will be managed as leachate. Monitoring and management details will be refined at the ECA approvals stage.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Regarding your response dated July 3, 2024, response #9 - Please note, the MECP applies the most recent science to guide recommendations and decisions, and thus will apply the more recently published surface water quality guidelines of 1) the Provincial Water Quality Objectives (PWQO), 2) the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines (CWQG), or 3) the Environment and Climate Change Canada's Federal Environmental Quality Guidelines (FEQG). The CWQG for unionized ammonia of 19 ug/L is the most recently published value for this parameter. Though the trigger mechanisms and contingency plans will be further developed during the permitting phase, it should be noted that the trigger value for unionized ammonia will likely be at or below 0.19 mg/L.	It is acknowledged and agreed that trigger values may change over time as science evolves and the trigger value for unionized ammonia will be modified to 0.19 mg/L.	The Surface Water Reviewer has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
Ministry of the Environment Conservation and Parks (MECP)- Indigenous Advisor		
Appendix O -Final Public Consultation Report Indigenous Consultation is lumped in with the Public Consultation within the EA report. Indigenous consultation should be in a separate Appendix and report as it pertains to potential impacts to Section 35 rights as identified in the Constitution. If concerns are raised by Indigenous communities to potential impacts to Aboriginal and or treaty rights, then the duty to consult is triggered and impacts need to be addressed. All the supporting documents are lumped in together with the public outreach. It does not appear as though all correspondence has been included. Supporting documentation regarding the Indigenous communities should be separated. The log also indicates	In general, there has been limited input received from Batchewana FN (BFN) during the conduct of the study despite numerous attempts to engage. Garden River FN and the Metis Nation of Ontario were more involved and provided input at various times throughout the study. However, BFN requested and received funding from the City of SSM to assist in their review of the FINAL EA and have provided comments/questions that will be reviewed and addressed by the project Team (see attachment). I believe we have completed all items as noted in the Proposed Action column.	The Indigenous Advisor has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
comments received by Indigenous peoples during Public Info Sessions, but reviewing these, it is not apparent. These should be separated as well. The Indigenous consultation log should be created and organized separately by each community, including: • Dates of contact or attempts to contact (and with whom), mechanisms of engagement (e.g., email/mail notifications, phone calls, virtual/in-person webinars or information sessions), what information was shared (e.g., presentation materials, aids such as maps, etc.), and key issues raised. • Table of comments/issues and responses, including: ○ Comments and issues raised via meetings, phone calls, or other correspondence. • If/how they were addressed • Areas where there are outstanding concerns; or • Commitments made, including to address concerns. • Copies of all correspondence and materials sent to and received from Indigenous communities.	Within the body of the EA Report Aboriginal Consultation is detailed in a separate section (ie. section 9.5). This section summarizes ALL input received from Aboriginal Communities throughout the duration of the EA. It highlights how concerns were addressed and where they are addressed in the EA. If desired this can be included as a separate Chapter in lieu of a separate subsection? In addition, within Appendix L of Appendix O we have summarized in tabular format all dates of contact or attempts to contact. This table includes the contact type and information that was shared. There is a separate Table for Indigenous Communities and there are subdivisions in the Table for each community. Although this information is included in a separate "Indigenous Community" table, we can include in a separate Appendix?	
Page 717 and 718. Proponent receives letter in May 2017 from Batchewana FN asking that they be engaged on the EA. The record indicates nothing else until February 16, 2023, where it is stated BFN requires funding to undertake a 3rd party review. There is no other record for BFN. What transpired? Was the funding provided? Is consultation ongoing? As per the above suggestion, the Record should demonstrate what transpired between 207 to 2013. Was capacity funding provided? Did BFN have any comments?	The report will be edited to reflect that it was agreed that it would be preferred to provide financial support to have the Final report reviewed rather than the Draft report as there were a number of important edits being undertaken to the Draft report. Ultimately the City of SSM provided funding and BFN provided comments and questions related to the Final EA (refer to the attachment) which are currently being addressed by the project Team.	The Indigenous Advisor has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Summary of Comments	Proponents' Response	Status
Provide a table that shows the consultation and supporting information.		
Page 718 – 730. The log demonstrates the consultation undertaken with the other Indigenous communities and references supporting documentation in Appendix N. It is hard to find because it is all lumped together and hard to determine if concerns raised addressed. The Record should be separate from the public consultation and clearly separated by Indigenous communities with a table demonstrating concerns raised and how they were addressed.	Concerns raised and actions taken are identified in Section 9.5 of the EA Report. Appendix N to the Public Consultation Report is arranged chronologically. The Indigenous Consultation log is included as a separate Table in Appendix L. All items included in Appendix L have dates to facilitate reasonably easy access to the relevant correspondence. However, if desired we can create a separate Appendix dedicated to Indigenous interaction.	The Indigenous Advisor has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.
The EA should note that the supporting information for the Indigenous consultation should be in one Appendix. The responses provided seem to suggest that another Appendix will be created, which is not what we are recommending. To clarify, there should just be a summary of Indigenous consultation in the body of the EA and then supporting info in Appendix XX. Please let me know if you have any further questions regarding this matter.	As you've noted there should be a summary of Indigenous consultation in the body of the EA and all supporting Indigenous information should be together in one Appendix. Therefore, our approach is going to be to leave the body of the report unchanged as is as there is currently a summary of Indigenous consultation included in Section 9.5 of the EA; however, we will also include a new Appendix Q which will include all supporting Indigenous information including the Indigenous Consultation Summary Table as well as all correspondence with Indigenous Communities. This will ensure that all Indigenous information is located in one Appendix and is easily identifiable.	The Indigenous Advisor has indicated that it is satisfied with the proponent's response and has no further comment. The ministry is satisfied this comment has been addressed.

Table 2. Public Comment Summary Table

Proposal: City of Sault Ste. Marie Solid Waste Management Environmental Assessment (EA)
Proponent: City of Sault Ste. Marie

Summary of Comments	Proponent's Response	Status
Resident 1		
From the ToR document "The purpose of this undertaking is to address the problem of diminishing disposal capacity and provide long-term environmentally safe solid waste disposal capacity for the City and area. In 2003 a total of 76,000 tonnes of residential, Industrial, Commercial and Institutional (IC&I) and biosolids waste was landfilled. Based on the current rate of landfilling, it is estimated that there are approximately 9 years of remaining disposal capacity in the City's existing landfill site. Given the limited existing disposal capacity, the City would like to secure a long-term solution to their waste disposal needs." p.4, S. 2. Is this statement correct? If nine years remained in 2003/5, what is the city doing today?	The City has continued to use the existing site and the site longevity was extended beyond the 9 years noted below primarily for the following reasons: 1. Waste diversion has been enhanced. 2. A significant proportion of the industrial, commercial and institutional (IC&I) waste has been exported to a northern Michigan landfill by a local waste management company for a period of time. 3. Approximately 10,000 tonnes of waste per year consists of biosolids or sewage sludge which takes up less space than conventional waste. 4. There is an approved "waste envelope" and the waste mound reaches a maximum depth of approximately 30 m. There has been waste degradation and subsidence over time which has resulted in an opportunity to landfill additional waste. Let me know if you have further questions.	The ministry is satisfied that the proponent has implemented methods to use the existing landfill to extend its long term waste capacity needs.

Summary of Comments	Proponent's Response	Status
The purpose of the study is to "address the problem of diminishing disposal capacity"? This sounds like the City is increasing disposal capacity or waste diversion which is not waste reduction. Landfill capacity increases or diversion sounds like building a parallel route for traffic to reduce congestion which doesn't work. The City should focus more on the first two R's. What else can the city do to reduce demand (i.e. reduce the generation of waste)?	Thank you for your interest in this project and your comments are duly noted and we fully expect that 3R's initiatives form an important component of the overall solution and will continue to evolve over time. The Municipality has taken steps and expects to take further steps in the future to promote and encourage waste reduction, reuse and recycling. Sections 1.5 and 4.1.1 of the EA include comprehensive descriptions of the 3R's initiatives that have been undertaken, or are proposed, or are promoted/supported by the City. Please see Section 4.1.1 of the EA document which provides further insight. We appreciate your input and if you would like to discuss any aspect of the EA further please do not hesitate to contact us.	The ministry is satisfied that the proponent has considered and encouraged waste reduction initiatives to reduce waste.
Resident 2		
The existing landfill is located on the significant ground water recharge protection area north of the City. The potential for ground water contamination is significant. Several years ago, the City extended the municipal water and sewer line from Fourth Line on Old Goulais Bay Road and then East to the landfill entrance on Fifth Line. This was done to service the residences and businesses of Old Goulais Say Road and Fifth	Groundwater at this site flows towards the southwest and to the southeast and the existing site has engineered controls to manage groundwater quality. The EA will include additional controls including a liner and leachate collection system beneath all new cells. The existing controls consist of a horizontal groundwater collector located immediately south and southeast of the disposal footprint and a series of 10 purge wells along the western boundary that run 24/7 except for short interruptions for maintenance. These controls collect potentially contaminated groundwater (i.e.. leachate) and convey that groundwater to an on-site wastewater pump station. The wastewater is subsequently pumped to the City's sanitary sewer system at Fifth Line and Old Goulais Bay Road. The potentially contaminated groundwater	The ministry is satisfied that the proponent considered methods to improve the project's groundwater quality.

Summary of Comments	Proponent's Response	Status
Line as well as the Landfill with a fresh and clean water supply. Currently, the Municipal water supply has not been extended to service the rest of the residences and businesses East of the site. Will the City be extending the Municipal water supply line further east to supply the existing residences and businesses on Fifth Line and at Great Northern Road? Please provide estimated timeline for further extension of such. If construction of an extension is not currently being considered, please provide information as to when this may commence. If the City were to extend the above outlined municipal water supply, it would show the commitment the City has to protect the local residents as well as the environment now and in to the future.	then flows to the West End Sewage Treatment plant where it is treated prior to being discharged to the St. Mary's River. The landfill site also has an extensive groundwater monitoring network which consists of numerous monitoring wells that have been installed within and downstream of the site to allow water quality monitoring upstream and downstream of the engineered controls. There are approximately 40 groundwater monitoring wells that are sampled three times annually. The objective of the groundwater monitoring program is to ensure that the groundwater that flows through and off-site meets stringent ministry criteria when it leaves the landfill site. The City also plans to establish a private well water monitoring program for neighbours that are interested in having their well water sampled and analysed. The private well sampling program will be initiated following receipt of ministry approval of the proposed site expansion. Some details related to the proposed private well monitoring program are included in Section 8.1.1.1 of the EA. We have also included below the "contingency measures" that are included as a commitment in the Waste EA document. One of the contingencies that will be considered if the landfill is found to be causing unfavourable quality impacts to private wells east of the site is an extension of the municipal potable water distribution system. We are hopeful that you will find this information beneficial but as noted above please do not hesitate to reach out for clarification or more information.	
Resident 3		

Summary of Comments	Proponent's Response	Status
We have received the notice of the landfill's EA. In reading the documentation online, I have noticed there is little reference to the odour emanating from the landfill and the process of the daily activities. In the past three to four years, we have noticed an increased amount of landfill odour. Can you share or explain what may be done at this location and a potential larger footprint that will deal with or address the constantly increased odour that comes from this site?	Based on information obtained through historical site odour complaints the principal contributor to odour generation is likely the delivery and disposal of sewage sludge/biosolids generated at the City's two sewage treatment plants. These biosolids deliveries are typically made during weekdays and this semi-fluid waste material is tipped and incorporated into the landfill's worked area. It is also likely that the decomposition of waste which contributes to the generation of landfill gas contributes to odour generation. There was considerable thought given to odour management throughout the planning phase for the proposed landfill expansion. The City has historically been proactively addressing odour management, the proposed expanded landfill is expected to reduce odour impacts relative to current operations. The final EA document incorporates important information related to future operations and odour management and mitigation. Specific sections of the report that address landfill operations are Chapter 6 and Appendix C and odour management is addressed in Sections 6.6.6, 7.3.6, 8.1.4 and Appendix M.	The ministry is satisfied that the proponent has committed to several mitigation measures for managing odour from the site.
Local Business Owner		
The EA predicts that the landfill will reach capacity by 2027 and the proposed area expansion would extend this to 2049. The landfill's usage should be reassessed to determine the contents that are taken and kept there. With the availability of local business nearby to ease the	The City is diligent in its efforts to reduce the amount of waste being landfilled though various waste diversion efforts. In the late 80's and early 90's there were years where the City was landfilling in excess of 100,000 tonnes per year. Throughout the period from the mid 90's through 2011 the City was typically landfilling between 60,000 and 80,000 tonnes per year. From 2011 to 2017 the landfilled wastes fell from approximately 60,000 tonnes per year to less than 40,000 tonnes per year. Since 2017 the City has been landfilling approximately 40,000 tonnes per year but has been below 40,000 tonnes per year for the last three years. The 2011 to 2017 reduction is in part related to the exporting of	The ministry is satisfied that the proponent has considered waste diversion to reduce landfilling.

Summary of Comments	Proponent's Response	Status
pressure on the industrial waste materials that are occupying space in the landfill (e.g. waste concrete, brick, and asphalt), these numbers can be extended above the EA's projections. I would like to propose Smith Aggregates located at 821 Old Goulais Bay Rd. become the preferred disposal site for concrete, brick, and asphalt in the City. Smith's Aggregates currently stocks and processes up to 20 000 tons of clean industrial waste in the form of concrete, brick, and asphalt annually for recycling. The public, contractors, and the Board of Works use the landfill to dispose of industrial waste, which doesn't belong at the landfill amongst household trash and can have another purpose when recycled. It occupies substantial space in the landfill and can easy be transported to Smith Aggregates. The particulars can be worked out (e.g. a landfill site weigh ticket can be brought from the landfill scale house and the materials can be disposed of for a tipping fee from	industrial, commercial and institutional (IC&I) wastes to the US by private sector haulers. The City has no control over the exported IC&I or non-residential waste and the management of this waste is often financially influenced meaning that business owners will often seek the lowest cost alternative. There is detailed information in the EA related to waste diversion efforts which can be found in Sections 1.5 and 2.3.1. The EA's preferred alternative includes enhanced waste diversion to reduce reliance on landfilling. At this time the residential diversion rate is currently approximately 30% and the City is targeting a 50 % residential diversion rate by 2030 which is achievable, in part, through the separation and diversion of organic wastes that are generated in households. Currently these organic wastes are being landfilled. We would also like to address waste concrete, brick and asphalt disposal at the landfill. The City is proactive in screening and diverting industrial waste concrete, brick, asphalt or large rocks. For example, the City recently rejected a 20 yard load from a commercial hauler that contained large pieces of concrete. The City also has an application process for the receipt of potentially contaminated materials and at the time of application the City will often reiterate that waste brick, concrete and asphalt are not accepted. Through the receipt of your letter and assuming it is satisfactory to you and you have the appropriate permit/license in place to accept waste concrete, brick an asphalt, the City plans to advise haulers that you are actively receiving and processing these materials. The City supports your efforts and will refer haulers to you and other suitable sites as appropriate based on the waste material types that are not accepted at the landfill.	

Summary of Comments	Proponent's Response	Status
the City to Smith Aggregates) freeing up landfill space for years to come. I would like to discuss this further with you and look forward to hearing your thoughts on this option to extend the landfill life even further and promote recycling within the City.	The City also has its own waste concrete and asphalt repository where they are actively recycling waste concrete and asphalt that they generate through their internal operations. The City does however acknowledge that they accept small amounts of concrete, rocks or bricks from residents, but the quantities are very small and this material is often used for cover or site infrastructure such as roadways and ditching within the landfill site.	

Table 3. Indigenous Communities Comment Summary Table

Proposal: City of Sault Ste. Marie Solid Waste Management Environmental Assessment (EA)
Proponent: City of Sault Ste. Marie

Batchewana First Nation (BFN) – Peer Review		
Natural Heritage Impact Assessment (Appendix D)		
Summary of Comments	**Proponent's Response**	**Status**
A1. Section 2.0 – Study area is defined as the preferred option boundary plus 100m of adjacent lands. Please clarify the reference for this 100m limit (e.g. defined by the EAA, another landfill reference). The project area has sensitive hydrologic features with potential to transport leachate.	The rationale for the selection of the study area is described in Section 2.0. It reflects the immediate zone of influence for natural heritage features; however, background reviews and impact assessments considered sensitive natural features beyond the 100 m study area which was reflected in the EA/NHIA.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A2. Section 3.2 – It appears as though no dawn breeding bird surveys, bat snag mapping (detailed or plot method) or bat acoustic monitoring were completed as part of the scope. Section 1.2 of AECOM's EA report refers to a final **EA Terms of Reference** that was approved by the MECP in 2005. Since SAR bats were not yet a main natural heritage consideration by the MNRF in 2005, this may be why the	The location, extent, and suitability of bird nesting habitat and bat habitat was summarized in the NHIA Report, as was the effect(s) on potential breeding birds and bat habitat. Moreover, appropriate mitigation will include the use of timing windows that restrict vegetation clearing during the active period for breeding birds (April 15 – August 31) and SAR bats (April 1 – September 1). This and other mitigation measures were included to avoid a contravention to the Migratory Bird Convention Act and Endangered Species Act, 2007 (ESA 2007), and specifically minimize the risk to migratory nesting birds and SAR bats. A Terms of Reference for Species at Risk (SAR) studies was not prepared.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

potential for Species at Risk bats and bat habitat were not considered in more detail by Dillon. Notwithstanding (continued in Questions #3- 5 below): (1) Please clarify whether or not a Terms of Reference regarding Species at Risk is available for peer review.	Responses included in this table will identify updates to the SAR screening such as the change in status under the ESA, 2007. This table will also identify potential habitats for species that currently have an Endangered and Threatened status that would require future assessment, including field surveys, prior to landfill expansion activities. **SARB (Species at Risk Branch) Reviewer Comments (Email Feb. 13/25):** (A2) MECP SARB recommends the Client include the active period for breeding birds (April 15 – August 31) and SAR bats (April 1 – September 1) within the comment table. **AECOM Response:** Addressed in revised text above.	
A3. (2) Please clarify whether or not (and how) candidate SAR bat habitat (in addition to screening for hibernation sties) was screened during the field program, as noted in Table A2.	Field assessment and background review of secondary source information (e.g., Geospatial Ontario (formerly Land Information Ontario), air photo interpretation, SSM Official Plan schedules, etc.) did not identify caves or abandoned mines in proximity to the landfill.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A4. (3) Please clarify how potential for impact to possible SAR bats/bat habitat will be mitigated.	Tree and vegetation removal will occur outside of the SAR bat active period (April 1 - September 30). Given the abundance of woodland habitat in the general location of the landfill, a Section 10 (habitat) contravention to the ESA, 2007 is not anticipated. COSSARO has assessed the following species as Endangered (Eastern Red Bat, Hoary Bat and Silver- haired Bat) and species and habitat protection measures became effective on January 31, 2025. As such, project activities which may contravene sections 9 and/or 10 for these SAR bats should consider measures to avoid or minimize potential impacts to these species.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

	SARB (Species at Risk Branch) Reviewer Comments (Email Feb. 13/25): (A3) COSSARO has assessed the following species as Endangered (Eastern Red Bat, Hoary Bat and Silver- haired Bat). Should any project activities occur after protection measures become effective (January 31st, 2025) which may contravene sections 9 and/or 10 for SAR, MECP SARB recommends the Client to consider potential impacts to these species. **AECOM Response:** Addressed in revised text above.	
A5. Section 4.0 - Please clarify whether or not resumption of benthic invertebrate monitoring has been recommended related to post-landfill expansion.	Environmental monitoring of surface water features for contamination will occur; however, based on the benthic invertebrate water quality testing results over several years, the landfill activities were determined to not have a deleterious effect; and as such this testing was determined to no longer have value. Furthermore, the operational risks associated with the expanded landfill are not expected to necessitate resumption of this monitoring program.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A6. Section 5.2 – To further mitigate against further colonization of invasive species in disturbed areas to accommodate the landfill expansion, it is recommended to re-vegetate all exposed soil immediately upon construction completion.	Exposed soils will be re-vegetated in accordance with the erosion and sediment control plan and operational plan developed for the detailed design of the landfill expansion project.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A7. Section 6.1 – Please clarify whether or not a Woodland Edge Management Plan Figure and Tree Preservation Plan Figure will be prepared and available for peer review.	A Woodland Edge Management Plan and Tree Protection Plan will be developed as part of the detailed design for the landfill expansion project.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

A8. Section 6.1 – Installation of native tree plantings along the new woodland edge would help reduce edge effects as part of the Woodland Edge Management. Please clarify whether or not this approach will be part of overall mitigation/restoration.	A Woodland Edge Management Plan and Tree Protection Plan will be developed as part of the detailed design for the landfill expansion project.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A9. Section 6.2 –Installation of exclusion fencing as mitigation against potential encroachment into the construction area by SAR turtles and other reptiles is recommended. Table A2 notes "moderate" potential snake habitat is nearby.	Exclusion fencing and site isolation will be incorporated into the construction area detailed design drawings for the landfill expansion project to reduce the likelihood that a member of the species may be killed, harmed, or harassed by becoming trapped within the site and contravening section 9 of the ESA (2007). Temporary exclusion fencing designed in accordance with OMNRF Reptile and Amphibian Exclusion Fencing Guide (2016) will be included during construction to exclude turtles from the stormwater pond construction area and permanent fencing can be considered if deemed necessary. **SARB (Species at Risk Branch) Reviewer Comments (Email Feb. 13/25):** (A9) MECP SARB notes the installation of exclusion fencing as mitigation against potential encroachment into the construction area by SAR turtles and other reptiles. The ministry requires clarification on the use of the pond (proposed feature) at the north end of the site. Blanding's turtles have potential to take up residence/occupy water features (such as a pond) in the future. MECP SARB recommends the installation of exclusion fencing, following the guidance in the OMNRF Reptile and Amphibian Exclusion Fencing (2016) document, outside of the active season (April 15th – October 15th) following a thorough search of the development area to confirm that there are no individuals present on the site at the time of installation to reduce the likelihood that a member of the species may be killed, harmed, or harassed by becoming trapped within the site and contravening section 9 of the ESA (2007).	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

	AECOM Response: Addressed in revised text above.	
A10. Section 6.5 – Please define the environmental monitoring frequency (e.g. monthly is fairly standard), including for erosion measures and protection of protected vegetation communities.	Environmental monitoring will be conducted monthly or more frequently, as required, due to site conditions.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A11. Table A2 – The following SARO designations have changed since the 2005 Dillon report: Barn Swallow – Special Concern Eastern Wood-pewee – Special Concern Rusty Blackbird – Special Concern Short-eared Owl – Threatened Wood Thrush – Special Concern Eastern Small-footed Bat – Endangered Milksnake – No longer listed	Comment acknowledged.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A12. It is understood that an aquatic assessment was not completed for the landfill site. Given the sensitive nature of the adjacent creeks (coldwater systems), please confirm the riparian buffer that the proposed landfill expansion will have to the creeks.	With the exception of the proposed northeast surface water management pond with hydrologic connection to Canon Creek, a general riparian buffer of approximately 75 m to the landfill expansion area is proposed. The proposed pond will function to improve storm water quality prior to discharge to Canon Creek. **AECOM Comment:** Revised text above to clarify the purpose of the storm water management pond.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A13. Please clarify whether or not a fisheries screening or impact assessment addendum will be	A fisheries screening and Fisheries and Oceans Canada (DFO) Request for Review will be completed for the SWMP construction and outlets during the detailed design stage for the landfill expansion project.	BFN's Peer Review comments and the City's responses have been

completed for the SWMP construction and outlets. These outlets, specifically, the northern pond, will outlet into direct fish habitat. Given in-water work may be required to connect the outlet of the ponds to the watercourse, an impact assessment/fisheries screening is recommended for these works to ensure proper ESC measures, stone size, energy dissipation, timing windows, *etc.* are implemented.		reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
A14. Please clarify whether or not thermal mitigation measures have been included in the proposed SWMP designs. Given the receiving watercourses are coldwater and/or have coldwater fish species, it is recommended that thermal mitigation measures be considered (such as a bottom draw outlet, cooling trench, riparian plantings, *etc*.).	Thermal mitigation measures have been identified and will be incorporated during detailed design stage for the landfill expansion project.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
Part B- Hydrogeology and Contaminants		
B1. Current waste area operates with leachate collection system installed in 1992, and future work will include mining of a large area of existing waste to incorporate into the future full containment site, which will contain and treat	No response required	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

leachate to limit potential future impacts to ground water and surface water.		
B2. Is the hydrogeology of the site adequately described? The site and existing landfill have been studied for four decades. There have been a large number of hydrogeological monitors installed and there is a considerable database that adequately represents site conditions.	In addition to the descriptions in the EA and appended hydrogeological assessment, there are also many other supporting documents related to the site hydrogeology including numerous annual reports.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
B3. Ground water modelling indicates that potential impacts to ground water increase after the 150 year lifespan of the leachate collection system, but the predicted impacts would meet RUP. Section 4.7 indicates that revised operating time will be used for the ECA application, which will reduces these potential impacts. Can more information be provided regarding these updates?	The revised groundwater modelling to be completed as part of the ECA application submission can be provided at that time.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
B4. It is worth noting that monitoring will be active during the leachate-producing lifespan of the site, and the operating life of the LCS. Additional containment or purge wells or repairs could be implemented if the monitoring predicts future impacts to be unacceptable.	Agreed. No response required.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

B5. Is the hydrology of the site adequately described? The site and existing landfill have been studied for four decades. There is a considerable database of surface water information that adequately represents site conditions.	In addition to the descriptions in the EA and appended surface water assessment, there are also many other supporting documents related to the site hydrology including numerous annual reports.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
B6. Is the ground water monitoring program adequate? The program includes 38 locations that represent background, source and downgradient locations. Based on this distribution, we concur that it should provide an adequate ongoing monitoring program.	The adequacy of the monitoring program is assessed on a regular basis by the Municipality's consultant and by MECP.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
B7. Is the surface water monitoring program adequate? The program includes 5 locations on Canon Creek and the Root River. Based on this distribution, we concur that it should provide an adequate ongoing monitoring program.	The adequacy of the monitoring program is assessed on a regular basis by the Municipality's consultant and by MECP.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
B8. An evaluation of the collection and use of landfill gas to be used as a fuel was completed in 2011, and is only briefly described in the EA report. Given changing technologies over the last decade, is it relevant to review this conclusion or the EA document may wish to include further information regarding the election to not collect and re-use this potential fuel source.	As documented in Section 11.3 of the Design and Operations report, landfill gas is currently, and will continue to be, collected. At present, collected landfill gas is flared only. As documented in the Design and Operations report, landfills represent a source of greenhouse gas emissions, and the City of Sault Ste. Marie has and will continue to look at opportunities to utilize this gas to create energy. The decision to move forward with energy production would be based in part on the completion of a future business case to confirm financial viability. The Municipality has been and will continue to monitor this over time.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

Part C- Archaeological/ Cultural		
General comments: • Proponent: The original report author was unavailable for comment, so comments were provided by a colleague. If future archaeological work is necessary, it will be conducted at the time of preliminary/detail design and in conjunction with the ECA application and will involve the participation of BFN. It is also noteworthy that although the assessment that was undertaken included the entire site, future site development activities will only impact a portion of the site and in some cases the areas that will be impacted have already been previously disturbed. • MCM response to City (email July 9, 2025): The Stage 1-2 archaeological assessment (AA, under Project Information Form (PIF) number P065-0218-2013) has been entered into the Ontario Public Register of Archaeological Reports ("the Register") without technical review. o MCM's letter indicating that a report has been entered into the Register without technical review means that the report met ministry criteria under which it was not subject to a full and detailed review. o No revisions to the report are required at this time. As part of the AA process, licensed consultant archaeologists are required to engage with First Nations and Indigenous communities beginning at Stage 3 of the assessment process for certain types of archaeological sites, however they are encouraged to do so earlier in the process wherever possible. Additionally, MCM does not determine which Nations or communities should be engaged – this is determined by the licensed archaeologist.		
C1. Pg. 29-30 - Section 3.2.1 Archaeological/Cultural: • "Indigenous" is the most accepted term when referring generally to the first peoples of present- day Canada. Terminology should be updated throughout the EA document.	Terminology has changed over time and this report has been developed over a significant time period. Changes to terminology can be considered if necessary. Section 3.2.1 is a high-level overview of the service area and is not intended to be a detailed discussion. This holds true for all subsections in Chapter 3. The focus of the EA is the landfill site and surrounding area and detailed descriptions/analyses are provided for the project area. The EA references "Cultural" at times to recognize it was considered even though there are no Built Heritage Resources or Cultural Heritage Landscapes in the Project area.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

• Best practice suggests that geological/environmental, precontact Indigenous people's settlement, and post contact settlement data should be presented in more detail with source data cited. • The EA refers at times to the section as Archaeological / Cultural, however no Cultural Heritage studies were conducted. It notes that there are no Built Heritage Resources or Cultural Heritage Landscapes in the Project area. MCM response to City (email July 9, 2025): • The revisions in the updated EA document have been addressed. • MCM response: MCM understands that the checklist was completed (included in Appendix H.1 of the EA Report) and that the proponent responded "yes" to question 4 d), indicating that the study area contains buildings or structures that are 40 or more years old. The supplementary	MCM (Ministry of Citizenship and Multiculturalism) Reviewer Comments (Email Feb. 18/25): MCM concurs with ASI's comment regarding the use of the term "Indigenous." Revision is recommended. AECOM Response (Email May 27, 2025): The revision has been completed in the updated EA document. MCM (Ministry of Citizenship and Multiculturalism) Reviewer Comments (Email Feb. 18/25): MCM agrees that the EA report should provide citations or refer to its source material. In addition, the description of existing conditions as they relate to cultural heritage resources (including archaeological resources, built heritage resources [BHRs], and cultural heritage resources [CHLs]) should focus on whether the study area has been previously screened/assessed, and the findings/recommendations of any technical cultural heritage studies undertaken. As ASI notes, it appears that no Cultural Heritage Evaluation Report(s), Cultural Heritage Report or Heritage Impact Assessment were undertaken for the project. No documentation is provided to support the proponent's conclusion that there are no built heritage resources (BHRs) or cultural heritage landscapes (CHLs) in the study area. We recommend confirmation of whether the area was screened using MCM's Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes screening checklist. The completed checklist should be included as an appendix to the EA Report, along with any supporting documentation. AECOM Response to MECP (Email May 27, 2025): The checklist and supporting information were sent to MCM and are attached here to (ie. Form 0500E and 021_0500e Supplement) together with the City of SSM checklist/rubric. The checklist and supporting documentation was added to the EA as Appendix H.1.	

information (also included in Appendix H.1) indicates that the identified structures are office, maintenance, and operational buildings. A photograph of the office building is included, and the documentation indicates that "The maintenance garage is of similar construction (City of SSM). Although the age is over 40 years old, the commonplace [sic] architecture, unremarkable design, and comparatively recent age suggest that the two structures are of low Cultural Heritage Value or Interest [sic]. Further BHR work is not recommended." o MCM recommends that photographs of each structure be included and clearly identified. o We also note that it appears that there may be inconsistent information in the documentation. It is unclear whether there are two or three	MCM (Ministry of Citizenship and Multiculturalism) Reviewer Comments (Email Feb. 18/25): Based on the above, we suggest the inclusion of following text: *"Section 3.2.1 Cultural Heritage Resources* Cultural heritage resources include archaeological resources, built heritage resources, and cultural heritage landscapes. *Archaeological Resources* A Stage 1 and 2 archaeological assessment (AA, under Project Information Form (PIF) number P065-0218-2013) was carried out by [consultant archaeologist] for [property or study area]. A Stage 1 AA consists of a review of geographic, land use and historical information for the property and the relevant surrounding area, an optional property visit to inspect its current condition, and a review of reports relating to any known archaeological sites on or near the property. Its purpose is to identify areas of archaeological potential and recommend further archaeological assessment (e.g., Stage 2-4) as necessary. A Stage 2 AA consists of a survey of the land to identify any archaeological resources on the property. The archaeologist will determine whether any archaeological resources found are of sufficient cultural heritage value or interest to require Stage 3 assessment. The Stage 1 and 2 AA report (under PIF number P065-0218-2013) has been entered into the Ontario Public Register of Archaeological Reports and is included in Appendix [X]. [Then include the outcomes and recommendations of the report, as described in the Executive Summary of the Stage 1-2 AA] *Built Heritage Resources and Cultural Heritage Landscapes* [If the conclusion of the completed checklist is that there is low potential for BHRs/CHLs in the study area, include the following text:] MCM's *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes* screening checklist was completed, and it was determined that there is low potential for built heritage resources	

	buildings/structures 40 years of age or older. The excerpt table appears to list three. We recommend that the documentation be revised to clarify. o We also note that the "comparatively recent age" of these properties should not be considered as an indicator of low potential for CHVI – the properties are over 40 years of age. We recommend revising this documentation. o We recommend that the conclusion be revised to align with the legislative framework, for example: "The structures have low potential to be built heritage resources, i.e., low potential cultural heritage value or interest, therefore, further technical cultural	and cultural heritage landscapes within the study area. Therefore, no additional technical cultural heritage studies (e.g., cultural heritage evaluation report) are required. The completed checklist is included in Appendix [X]." AECOM Response to MECP (Email May 27, 2025): The text as noted above has been incorporated into the EA as requested (Sections 3.2.1 and 7.3.1.1). City's response to MCM (Email July 17, 2025): MCM's Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes screening checklist was completed and is included in Appendix H.1. Two existing buildings located on the landfill site property, the Administration Building and Maintenance Garage, were identified in the checklist as being more than 40 years old. The architectural style, unremarkable design, and intended function of the buildings indicate the two structures have low potential to be built heritage resources (i.e., low potential cultural heritage value or interest). Photos of each building can be found in the supplemental screening documentation located in Appendix H.1. Additionally, historical map sources were examined to determine if any earlier structures were present on the property with none found. Based on available information, the landfill property is not considered to be a landmark or contain any other structures more than 40 years old. Based on this assessment, further technical cultural heritage studies (e.g., cultural heritage report, heritage impact assessment) are not required despite the presence of on-site buildings that are 40 years of age or older.	

	heritage studies (e.g., cultural heritage report, heritage impact assessment) are not recommended." o For clarity and to document cultural heritage due diligence, MCM also suggests that that a summary of the supplemental information provided in Appendix H.1 be included in Section 3.2.1 of the EA (under the Built Heritage Resources and Cultural Heritage Landscapes sub-section). The EA Report should document how the proponent came to the conclusion that additional technical cultural heritage studies are not required, despite the presence of buildings/structures 40 years of age or		

older within the study area.		
C2. Pg. 172 – Section 7.3.1 – Archaeology • General comment: Much of the text within Section 7.3.1 (Archaeology) has been copied verbatim from Woodland Heritage Services Ltd.'s 2014 Stage 1 and 2 report. ASI's peer review comments on the report (#7, 9, 10-15 below) apply to Section 7.3.1 of the Sault Ste. Marie Solid Waste Management EA. • MCM response to City (email July 9, 2025): We note that the text from other sections was also included.	Section 7.3.1. is intended to provide a high-level summary of the Archaeological Assessment Report. Any changes made to the Archaeological Assessment Report will be reflected in Section 7.3.1. MCM (Ministry of Citizenship and Multiculturalism) Reviewer Comments (Email Feb. 18/25): The AA report has been entered into the Register – see comments above. However, we recommend that this section be revised to include the recommendations verbatim from the Stage 1-2 AA. AECOM Response: The text as noted above has been incorporated into the EA as requested (Sections 3.2.1 and 7.3.1.1)	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
C3. Pg. 177 – Table 7.12 Archaeology – Summary of Net Effects • Under the "Proposed Mitigation" column, protocol/instructions if human remains are encountered should also be included. • Example: If human remains are encountered on the property, work should be halted, and the landowner is	The additional mitigation noted will be incorporated as requested. MCM (Ministry of Citizenship and Multiculturalism) Reviewer Comments (Email Feb. 18/25): It appears that the proponent will be incorporating ASI and BFN's revisions. MCM recommends including the following text under the "Proposed Mitigation" column, for consistency with the current heritage regulatory framework: "Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the Ontario Heritage Act. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

required under the *Funeral, Burial and Cremation Services Act*, 2002, S.O. 2002, c.33 to notify the police or coroner office. If the remains are determined to be of non-forensic interest, the Office of the Registrar of the *Funeral Burial and Cremation Services Act* should be notified. ○ Best practice dictates that if the human remains are of non-forensic interest, Indigenous communities with overlapping traditional territories should be notified. In addition to reporting to the proper authorities, the proponent should provide a prompt notification to Batchewana First Nation through the appointed representative. In respect to Batchewana First Nation Archaeological Human Remains and Cultural Artifacts Repatriation Protocol. • MCM response to City (email July 9, 2025): We note that the table text has been updated.	out an archaeological assessment, in compliance with Section 48(1) of the Ontario Heritage Act. The Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33 requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery and Procurement, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act." We also suggest that Table 7.12 clarify that the study area does not have archaeological potential. AECOM Response: The text as noted above has been incorporated into Table 7.12 of the EA as requested and it has been clarified within the table that the study area does not have archaeological potential.	

C4. Report title page: • ASI acknowledges that this report was accepted by into the Ontario Public Register of Archaeological reports, however ASI notes the lack of correspondence to the current 2011 S&G that were employed during the 2014 assessment. • Report title "Stage 1 and 2 Archaeological Assessment Landfill Expansion, City of Sault Ste. Marie" should also include the landfill's address, the affected lots, concessions, geographical township, and county as per the requirements of the 2011Standards and Guidelines for Consultant Archaeologists (S&Gs)Section 7.4, Standard 2. • Example: "Stage 1 and 2 Archaeological Assessment Landfill Expansion, Part of Section 7 (Geographical Township of Tarentorus, Algoma District) City of Sault Ste. Marie".	*As the report has been entered into the MCM Ontario Public Register of Archaeological Reports, modifications to the title, or other parts of the document, are not possible at this time. The requested information is provided below and any future reporting will incorporate the complete address. The Sault Ste. Marie Landfill is located at 402 Fifth Line E, Sault Ste. Marie, Ontario. Geographically the landfill site is located in Part Sec. 7, Tarentorus Township, Algoma District. MCM (Ministry of Citizenship and Multiculturalism) Reviewer Comments (Email Feb. 18/25): The AA report has been entered into the Register – see comment above.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

• MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		
C5. Executive Summary: • Ministry name has changed from the Ministry of Tourism, Culture and Sport (MTCS) to the Ministry of Citizenship and Multiculturalism (MCM) as per Ontario Heritage Act, R.S.O. 1990. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	At the time of writing the correct Ministry name was used.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
C6. Pg.2 – Development Context section, paragraph 5: • Mention of the Planning Act should be removed as the project falls under the requirements and regulations of Environmental Assessment Act. Suggest the named Acts should include their latest amendment date. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	Acknowledged, however modifications to the report at this time are not possible for reasons cited in C4.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

C7. Pg. 3-5 - Historical Context Section: • Citations would be expected for the content discussed for each time period listed, such as archaeological trends and artifacts, geological and environmental changes, lithic tool technologies and trends, Indigenous ceramic vessel construction and trends, European contact and Jesuit observations, and the 19th and 20th century development of Sault Ste. Marie. o S&G Section 7.7.1 requires the results of the research conducted for the Stage 1 background study to be described and the sources documented. • Best practice expects that Treaties and Traditional Territories of Indigenous communities which overlap with the Project area should be acknowledged and discussed. Upon request, oral histories provided by	1. An updated Historical Section is not possible at this time for reasons cited in C4. It should also be acknowledged that the Archaeological Master Plan for Sault Ste. Marie generally lacks citations with the exception of one reference to a personal communication with Dalla Bona. 2. The Treaty which includes the study area will be acknowledged, however, discussions of the appropriateness, or interpretation of the treaty and its affect on Indigenous peoples will not be included as these discussions are best left to the affected peoples and the governing body who issued the treaty. 3. Should affected First Nations wish to provide histories, oral or otherwise, these shall be included in this table, as modifications to the report at this time are not possible. 4. The background research section will be updated to include reference to these maps.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

the engaged Indigenous communities should also be incorporated within the report. • As per S&G Section 1.1, background research must include reference to topographic mapping and historic settlement maps. There is no discussion of these maps within this section, nor are they presented in the Figures section (pg. 14-20). • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		
C8. Pg. 7 – Condition of the Property: • It is expected that aerial photos or satellite imagery which capture the effects and severity of the September 2013 weather event on the Canon Creek shoreline and the affected portion of the Project area would be provided. • MCM response to City (email July 9, 2025): The	Areas north of Canon Creek will not be developed. The areas to the south of Canon Creek had their archaeological potential reclassified owing to steep slopes and other areas of saturated terrain.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

AA report has been entered into the Register.		
C9. Pg. 7 – Dates of Fieldwork & Pg 9. – Field Methods: • The survey methods and field conditions required for when Stage 1 and Stage 2 fieldwork can be conducted are not described. • Example: "The Stage 1-2 survey was conducted under adequate lighting and visibility, with no snow cover or heavy fog, and the soils were not frozen or affected by excessive rain or drought". • S&G Section 7.2.2 and Section 7.8.1 require that if a property inspection and survey were carried out, the report must describe how the S&G standards for the property inspection and survey were met respectively. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	Regarding weather and lighting conditions: This information is available on Page 7. "Test pits were excavated at 5m intervals in areas of archaeological potential where archaeological potential was confirmed to exist of sizes at least 30x30cm in size down to where either disturbed soils or sterile soils were observed. Test pits were backfilled. All excavated materials were screened through 1/4" mesh." Page 9. Regarding 7.7.2 (ASI Cited 7.2.2) Descriptions regarding 7.7.2 and 7.8.1 are described on Pages 9-11. With regard to the requirements of s.7.8.1, test pits were excavated at 5m intervals in areas of archaeological potential where archaeological potential was confirmed to exist of sizes at least 30x30cm in size down to where either disturbed soils or sterile soils were observed. Test pits were backfilled. All excavated materials were screened through 1/4" mesh.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

C10. Pg 9. – Field Methods: • Estimates of the percentage of each survey method employed within the Project area are required as per S&G Section 7.8.1, Standard 3. They are not presented within the report. • Example: "Approximately 5% of the Project area was subject to test pit survey at 5m intervals, while 25% was documented as being disturbed by landfill activities". • The S&Gs require that all measurements must be in metric units as per S&G Section 7.5, Standard 2. • Example: ¼" mesh should be updated to 6 millimetre mesh. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	It is acknowledged that Dalla Bona's report does not list the percentages explicitly, but this information can be readily obtained by examining Figure 6. The percentages are listed here and obtained through the measurements from the figures present in the Dalla Bona report: Areas marked as 'Area Tested' = 1.79 ha Areas marked as 'Erosion': = 9.31 ha Areas marked as 'Poorly Drained' = 5.50 ha Areas marked as 'Bedrock, Steep Slope' = 37.56 ha Areas marked as 'Steep Slope' = 6.78 ha Areas noted to be 'Disturbed' = 88.82 ha It is acknowledged that the measurements should have been in metric units. The statement that, "All excavated materials were screened through 1/4" mesh." should have been updated to 6 mm. (or more accurately 6.35 mm.) That said, products available in hardware stores are sold as ¼".	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
C11. Pg. 9 – Archaeological Potential Area B: • Area B is located within the northeastern corner of the Project area, rather than the	This area is north of Canon Creek well removed from the area that will be developed as part of this project. There will be NO disturbances in this area related to the proposed undertaking.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry

northwest corner as stated in the report. • The author describes that as the first 50m of the buffer for the Western Root River does not have potential (due to poorly drained wet conditions), that it's acceptable to discount the remaining 100m of the buffer (further inland) as having no potential. Figure 6 (results) indicates that the remaining 100m of the buffer comprises bedrock and steep slopes, however there are no photos that confirm these conditions. It isn't clear if this portion of Area B was inspected. • Of the photos taken within Area B, only one photo adjacent to the river shows standing water. The surrounding vegetation comprises coniferous and deciduous trees with varying ages, which suggests this area is not permanently low and wet with poorly draining soils. • ASI suggests that remaining 100m of the watercourse		is satisfied BFN's concerns have been addressed.

buffer of Archaeological Potential Area B should be reinspected and photo documented to confirm an absence of archaeological potential. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		
C12. Pg. 10 – Archaeological Potential Area D: • The report only comments on the archaeological potential of the first 50m of buffer north of Canon Creek (no potential due to undulating terrain, poorly draining soils, and exposed bedrock). There is no discussion provided for the lands within the remaining 100m of buffer, however they are mapped as "bedrock and steep slopes" in Figure 6. • Photo captions corresponding to the northern portion of Area D makes mention of visible "push piles of soil". It is expected that this section clarify and/or discuss the cause of these piles and	This area is north of Canon Creek and removed from the area that will be developed as part of this project. There will be NO disturbances in this area related to the proposed undertaking.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

how they effected the determination of no archaeological potential within Area D. • Area D photos document disturbance related to the Canon Creek erosion remediation disturbance and push piles of soil, in addition to areas of standing water. These areas of disturbance and low and wet conditions are not mapped in Figure 6. • Photos 27-30 are within Area D; however, they are labelled as being within Area B. • ASI suggests that remaining 100m of the watercourse buffer of Archaeological Potential Area D should be reinspected and photo documented to confirm an absence of archaeological potential. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		

C13. Pg.10 - Archaeological Potential Area E2: • The portion of Area E2 within 50m from Canon Creek was not subject to site inspection due to steep slope. The slope which precluded access was not photo documented. If the area was inaccessible, the geographic extent of the slope was not confirmed. It is expected that the area should not be documented as sloped without visual confirmation. For inaccessible or remote areas, the MCM requires the degree of remoteness be documented in sufficient detail to demonstrate practical obstacles to achieving access (i.e. lack of transportation routes such as roads or trails, and visibility such as dense forest cover). Aerial photos, detailed engineering plans, or other detailed mapping (i.e. topographic), when presented in sufficient scale, detail, and quality, can be used to support evaluations of potential (S&G Section 1.3.4). These	Photographs 7-9 depict those areas. Also, please see the contour isopleths on the development plan. Additionally, the plan sets future disturbances back from the Canon Creek. The area to the south of Canon Creek has been previously disturbed.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

criteria were not met within the report. • ASI suggests that another attempt be made to access and photo document this section of Area E2 to confirm an absence of archaeological potential. If the area is deemed remote/inaccessible, documentation meeting S&G Section 1.3.4 should be provided. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		
C14. Pg. 10-11 - Archaeological Potential Area I: • The MCM's current expectations require aerial or satellite imagery, or detailed engineering drawings be included within the report to document the overall extent and impact the realignment of Canon Creek on the surrounding areas, to demonstrate the removal of archaeological potential.	This area has seen fairly extensive disturbance and will NOT be developed as part of this project. Additionally, it should be noted that the original landfill abutted the former creek's route. Please note that there will be NO disturbances in this area related to the proposed undertaking.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

• The assumption that bark canoes could not navigate the creek under normal conditions is presented as suggestive evidence that Canon Creek does not represent a past navigable watercourse, thereby diminishing the surrounding archaeological potential within the Project area. It should not be assumed that the Canon Creek alignment, depth and rate of flow *circa* 2014 was the same during precontact times. It should be acknowledged that proximity to water as a predictive model of archaeological potential relates to potable water in addition to watercourse navigability. • ASI suggests if areas of documented erosion within the report do not correlate with the extent of erosion documented through past aerial or satellite imagery or detailed engineering drawings, they should be reinspected, and photo documented to confirm an absence of archaeological potential.		

• MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		
C15. Pg. 11 – Archaeological Potential Area K: • ASI suggests that the conclusion that Fifth Line East was not a historically surveyed road and therefore does not have pioneer archaeological potential should be backed up by 19th and early 20th century mapping or other sources. Topographic mapping confirms the presence of Fifth Line East and structures fronting and setback from the roadway by at least 1939. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	The date of 1939 is late and this section of 5th Line should not be considered a historical transportation route. Below is a short history of the settlement of Sault Ste. Marie and the 5th Line Road: 1600s – SSM settled by French traders. Late 1840s – SSM Village and Townsite surveyed (Ladell, John L. [1993]. They Left Their Mark: Surveyors and Their Role in the Settlement of Ontario). 1857 – Map does not show any development in the immediate area (LC00013-00-1857WWL.jpg). Settlement is concentrated along the St. Mary's Rapids in the vicinity of the H.B.Co. post. The HBC has a road bypassing a section of the rapids at this time. (LC00013-00-1857WWL.jpg; as well as the 1855 town plan, https://recherche-collection- search.bac-lac.gc.ca/eng/home/record?app=fonandcol&IdNumber=4136957). 1859 – Surveyor notes do not mention any roads between Sec. 7 and Sec. 18. Sec. 7 is noted only as "The whole of this section is well fitted for settlement. The soil first rate and timber fine." While Sec. 18 "The southerly portion of this section is light stoney soil and the timber burned. The remainder is first rate soil and well timbered". The notes do, however, mention McKay's Road, which is mapped (2216_C28_TARENTORUS.pdf) between the St. Mary's Townsite abutting Sec. 32 and the Root River in Sec. 21 (Map XX). 1895 – Not shown on map. Limited development nearby, most of which is concentrated towards SSM (LC00139_00_1895_LS.jpg).	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

	1905 - 4th Line road built in 1905, but 5th line not mentioned (Ontario Sessional Papers, 1905, No.5-9; https://archive.org/details/n02ontariosession37ontauoft/page/n761/mode/2up?q=%22tarentorus%22+%225th+line%22). 1915 – This specific section of 5th Line Road is not developed, although other parts of it are. (ARM35A, https://prd-0420- geoontario-0000-blob-cge0eud7azhvfsf7.z01.azurefd.net/lrc-geology-documents/publication/ARM35A/ARM35A.pdf). 1937 – 5th line road exists on air photos (NAPL A5635_074 preview).	
C16. General comment: It is expected that the fieldwork photos presented following Figure 7 (Pg. 20) should be cited throughout the report where they apply to fieldwork observations, results, and methodology. The figure should also be cited throughout the report where it applies. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	Acknowledged. Unfortunately, this information cannot be included in the report for reasons cited in C4.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
C17. General comment: The report does not adequately discuss the rationale behind why areas greater than 50m from Canon Creek or the Root River do not exhibit archaeological potential, when there's no photo documentation provided to back up the results presented on Figure 6 (Areas B, D,	Acknowledged. Please note that no development is planned for those areas.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

E2, and I). The MCM's current expectations are that areas previously identified as having archaeological potential (such as those within the 2011 *Sault Ste. Marie Master Plan of Archaeological Resources*) require a site inspection, to document and confirm the absence of indicators of archaeological potential. Areas cannot be omitted from inspection unless they're documented as remote following S&G Section 1.3.4. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.		
C18. General comment: Many of the photos demonstrating standing water as evidence of an absence of archaeological potential show vegetation which would not thrive in permanently low and wet conditions with poor drainage (Area B). It's possible these areas of standing water are an artifact of recent precipitation. ASI suggests these areas be subject to additional site inspection and photo documentation under ideal field conditions. • MCM response to City (email July 9, 2025): The	Acknowledged. Please note that no development is planned for those areas marked as saturated.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

AA report has been entered into the Register.		
C19. General comment: There is inadequate photo coverage within the areas deemed to not have archaeological potential based on slope, bedrock outcrops, and low and wet conditions. The MCM's current expectations are that photos presented within the report should be evenly distributed throughout the areas assessed, in sufficient quantities for the size of the areas assessed. • MCM response to City (email July 9, 2025): The AA report has been entered into the Register.	Although we approach photo documentation differently, Dalla Bona's report has 78 photographs, many of which are of examples of ground conditions contributing to a conclusion of low archaeological potential.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
Section D- Air Quality		
D1. Further information/clarification is required on how the 'indicator compounds' were chosen. What criteria were used to screen out compounds from inclusion on this list? For example: toluene, ethylbenzene, methyl ethyl ketone, xylenes, trichloroethylene and other known HAPs.	The indicator compounds were selected for the air quality assessment for consistency with those deemed to be of greatest significance from typical landfill operations. These contaminants have been accepted as a fulsome list for assessing landfills in other large landfill EAs across Ontario. Through discussions with the MECP in 2019, Dillon included acrylonitrile, acrolein, and benzene to the list of indicator compounds.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

D2. The report mentions 8 developmental phases that were considered to determine the worst-case scenario, using a screening level approach. We would expect to see a site plan that corresponds to each of these 8 scenarios, showing the location of the landfill working face, site haul roads etc. as a visual representation to go along with the description. At a minimum, a more detailed site plan for Scenario 2 (identified worst- case) should be provided, vs what is currently shown in Figure 4.	The detailed site plan as provided in Figure 4 is a representation of the site layout and source configuration for Scenario 2 that were used in the air dispersion modelling assessment. A map showing the locations of all 7 cells and the detailed landfill development sequencing is included in the site's Design and Operations Report. Furthermore, since the completion of our assessment the City has proactively acquired, or is in the process of acquiring, the four nearest sensitive receptors on the north side of Fifth Line immediately adjacent to the sites western boundary.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D3. Are wind measurements recorded on site, and if so, how do those compare to the wind rose presented in Figure 3 for Sault College Station?	On-site wind measurements were not available as part of the assessment. The selection of the Sault College station located ~6 km south of the site is expected to be representative of the meteorological conditions at the site. The Sault College station provided readily available data for pre-processing by the MECP for use in air dispersion modelling.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D4. Section 2.6.1.1 discusses the 'screening level assessment' used to determine which of the eight (8) future scenarios for the landfill operations would represent the worst-case from an air quality perspective. It is unclear if this screening level approach included the development of emission rates for each scenario and dispersion	The screening level assessment did not include the development of detailed emission rates for each scenario and dispersion modelling. From a potential air quality impact perspective the first three cells were determined to be the most critical as the development of these cells includes significant activity i.e. landfilling, landfill base preparation, and landfill mining. Landfilling and base preparation are consistent activities throughout most of the life of the expansion and landfill mining is anticipated to add new operating activities.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

modelling, or if this determination was made solely based on the location of the landfill emission sources and the length of the haul roads. Please provide further details about what technical analysis was included in the screening level assessment.	The amount of waste movements during the 'mining' years are anticipated to be approx. three times higher than that of the normal operating periods when Cells 4 through 7 in operation. Furthermore, since the completion of our assessment the City has proactively acquired, or is in the process of acquiring, the four nearest sensitive receptors on the north side of Fifth Line immediately adjacent to the sites western boundary.	
D5. The report mentions that the landfill will have a fugitive dust best management plan in place. Please provide a discussion of current on-site dust management activities and how those may change over the course of the landfill life. Consider including a copy of the existing BMP as an appendix, as has been done with the odour management plan.	Fugitive dust is expected to be effectively managed through the sites BMPP, as it is today. Key elements of dust control include cleaning of debris and dust from main roads and public drop off area on a regular basis dependent on the weather. Performing Monthly inspections for dust control. Applying water to the compost windrows while they are active. The BMPP will be reviewed, updated and finalized through discussions with MECP during the ECA process. In addition, there have not been any offsite dust complaints received at the site for at least ten years and the City is committed to continual improvement for nuisance impacts which would include changes to the dust management practices if and when necessary.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D6. Modelling contour plots for NOx should be added to the report.	Isopleth concentration contour plots provide a visual approximation of predicted concentrations around a site and at specific receptors, however, we opted to present the predicted concentrations in tabular form which is a more accurate representation of results at specific receptors.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D7. The Report does not clarify how the worst- case operating hour was developed for on- site truck operations. The Report should be revised to verify the worst-case operating scenarios or updated to consider the timing of truck arrivals over shorter time periods.	The vehicle numbers were provided based on anticipated site operations and present an expected worst-case operating condition for all time periods (i.e. 1-hr and daily).	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

D8. The Report also does not appear to include public drop-off vehicles, especially consideration of higher use on a future weekend day when a peak hour is expected to occur. Based on the Traffic Impact Assessment, the projected AADT due to the project is 450 vehicles per day excluding construction vehicles which are noted to be projected as 80 vehicles per day. These volumes do not appear to be included in the assessment. Justification for not including public and construction vehicles in the assessment should be included in the Report or the assessment should be updated to include these AADT's.	The AQ Report does include public drop- off vehicles using estimated peak hourly and daily vehicle counts as shown on Table A.5. Please note that the 450 VPD presented in the Traffic Impact Assessment is a conservative estimate that also accounts for two-way trips. Dillon has used an estimate of 188 VPD (one-way) and applied round trips along applicable on- site haul routes. In addition, Dillon has included 81 one-way waste/construction vehicles per day (i.e. yard waste = 5, waste truck = 49, mining truck = 18, and soil cover truck = 9). The traffic report conservatively estimated an AADT of 80 for construction vehicles (Note: these are two-way trips). Based on experience, the small difference in the estimate of vehicles per day between the AQ and Traffic assessments is not anticipated to result in a substantive change to the results. There is a high level of confidence that the predicted impact will remain in compliance with the criteria.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D9. Consideration of a worst-case hour over a weekend typically also results in vehicle queueing before the weigh-in/out scales and at the dump bins. The MOVES emission factors were not generated for idling vehicles. It is our opinion that emissions from idling vehicles should be included in the assessment and modelling. Justification for not including queueing times and lengths should be included in the Report or analysis of the idling vehicles	The landfill has been operating since the 1960s and queuing, while it occurs on occasion, has not been a problematic issue thus idling was not deemed to be necessary to include in the assessment.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

should be included in the assessment.		
D10. Sample calculations were not provided for GHG CO2e estimates. The Report should provide sample calculations for GHG CO2e estimates to clearly illustrate how estimates were derived for each source type.	All the information that would facilitate a sample calculation or re-calculation of emissions (i.e. methodology, equations, and parameters) are included in the report. Section 2.6.2 Emission Rate Estimation of the assessment provides explanation of methodologies and equations used in the calculation of emissions. The calculation workbook provided as Attachment A – Air Quality Impact Calculations provides all additional parameters used in the emission rate estimates. Specifically see Appendix D – Greenhouse Gas Calculations - Existing Conditions, Appendix E – Greenhouse Gas Calculations – Scenario 2 and Appendix F – Greenhouse Gas Calculations – Post Closure.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D11. Global warming potentials (GWP) used in the calculation of CO2e were not provided. The Report should be updated to provide the GWP used in the assessment.	Canada did not adopt the IPCC's Fifth Assessment Report GWP's until the Greenhouse Gas reporting notice in the Canada Gazette "Notice with respect to reporting of greenhouse gases (GHGs) for 2022 and 2023" dated January 28, 2023. This was after the issuing of the Sault Ste Marie Air Quality report. The change in the GWPs would not have a significant/material impact to the conclusion of the GHG assessment. The calculation workbooks provided as Attachment D, E, and F provides additional information used in the GHG emission rate estimates.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D12. Tables D-5 and E-5 have a column for Total Emissions (g/s) that contain dimensions of the source. Please update Tables D-5 and E- 5 with correct information.	Please note that Table D-5 and E-5 were prepared to provide construction equipment specifications only. The column titled "Total Emissions (g/s)" was titled in error and is intended to provide "Equipment Dimensions". Emission estimates for the equipment is provided in tables D.9 an E.9, respectively. **Air Quality Reviewer Comment (Email March 5/25):**	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

	The proponent should correct the error on the column titled "Total Emissions (g/s)" in Table D5 and Table E5. The proponent should correct the column title as the title is equipment specifications, not emissions. **AECOM Response:** The Air Quality Report (Appendix M of the EA) has been revised to correct the above noted errors.	
D13. For the estimate of GHG from non-road vehicles, U.S EPA emission factors for Exhaust and Crankcase Emission Factors for Non-Road Engine Modeling Compression- Ignition (2010) were used. These emission factors only included CO2 and not CH4 or N2O.Provide rationale why CH4 and N2O were not included as more recent emission factors for this source type are provided in references such as the ECCC National Inventory Report.	Emissions of CH4 and N2O from nonroad vehicles represent a de minimis portion (<0.5%) of total emissions from the Landfill operations. The majority of emissions occur from Landfill Fugitives, Flaring, and nonroad vehicles (CO2) and as such this was the focus of the assessment.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
D14. Confirm the intention to obtain a new or amended environmental approval for the operation of the proposed site and the detailed information for the proposed equipment that will be required to demonstrate that the project will operate in compliance with O.Reg. 419/05.	The site intends to obtain a new/amended ECA for the operation of the proposed site upon approval of the EA. The "compliance assessment" was completed to demonstrate the site's ability to meet compliance under O.Reg. 419/05.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

D15. The conclusion of the Report should include commentary on the implications of exceeding the 1-hr NO2 CAAQS value on the local airshed.	The conclusion of the Report indicates that the predicted cumulative levels of NO2 for the environmental effects assessment are not considered to be significant due to the infrequency of occurrence. The emission summary table provides a comparison of the frequency that receptors with 1-hr NO2 cumulative concentrations higher than the 2025 CAAQS. The CAAQS are stringent aspirational drivers for air quality management across Canada that are intended to be used as objectives and not as criteria.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
Section E- Noise		
E1. Confirm whether vacant lot receptors have been considered, and whether additional points of reception along Old Goulais Bay Road are required.	Vacant lots have been considered but there are no vacant lot receptors that are located closer to the site than the existing residential receptors that have been included in the modelling. Since compliance is achieved at the assessed receptors, it is expected that compliance is also achievable at potential vacant lot receptors that may be located further away from the site than the existing receptors that have been assessed. Since the completion of our assessment the City has proactively acquired, or is in the process of acquiring, the four nearest sensitive receptors on the north side of Fifth Line immediately adjacent to the sites western boundary. In the case of the lands to the north, City Planning has confirmed that these lands are not favorably zoned for sensitive uses, are landlocked and have very limited development potential. Furthermore, the City's Draft OP which is expected to be submitted to the province for approval later this year, includes a number of policies that will specifically prohibit development of sensitive receptors within proximity of the landfill, which if approved, will add another layer of protection around the landfill.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

E2. In Table 2, the two front-end loaders have different source heights. Clarification for source heights of front-end loaders should be provided.	There are two different front-end loaders (FELs) that operate at the site with one of them being larger and taller than the other one. To be conservative, the modeling was done using the higher noise level of the two FELs. The source height difference is accounted for in the modelling.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
E3. Site Plans should be provided for each of the 8 developmental phases of the landfill that were considered in the assessment, indicating the location of the landfill working face, site haul roads etc.	Relevant site plans have been provided in other relevant technical supporting documents for the EA including the Air Quality Impact Assessment and Design and Operations (D&O) report.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
E4. Describe the scenarios that would include the construction and operation of Cells 5- 7. Further justification for the use of Scenario 8 (Cell 3 operation, Cell 4 construction) as a worst-case scenario should be provided.	Description of various landfill construction and operation phases have been discussed in detail in the D&O. The worst-case noise modelling scenario accounts for number of noise sources (highest counts) and their respective distances to the closest nearby receptors. Based on sequencing and staging of cell construction and operation, cells 5 – 7 do not occur at the same time. The assessed scenario does include activities at cell 7, as well as cell construction at cell 4 and working face at cell 3. Note that the closest cluster of receptors are to the south of the site, closest to cell 3. Most noise is generated at the working face of the landfill, which for the scenario assessed is at cell 3.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.
E5. Additional details on the modelled line sources should be added to the Report to clarify the standard used.	No line sources were included in the noise propagation modelling.	BFN's Peer Review comments and the City's responses have been reviewed by ministry technical support staff and the ministry is satisfied BFN's concerns have been addressed.

Making a submission?

You will have an opportunity to comment on this Ministry Review for a five-week period. During this time, any interested parties can make submissions about the proposed project, the EA, or this Review. Should you wish to make a submission, please send it electronically to Devon.Wills@Ontario.ca and address it to:

Kathleen O'Neill, Director
Environmental Assessment Branch
Ministry of the Environment, Conservation and Parks
Re: Sault Ste. Marie Solid Waste Management Plan Environmental Assessment
Attention: Devon Wills, Project Officer

All personal information included in a submission—such as name, address, telephone number and property location of requester—is collected, maintained and disclosed by the ministry for the purpose of transparency and consultation. The information is collected under the authority of the *EAA* or is collected and maintained for the purpose of creating a record that is available to the general public as described in s.37 of the *Freedom of Information and Protection of Privacy Act*. **Personal information that is submitted would become part of a public record that is available to the general public unless a request is made that personal information remain confidential. For more information, the ministry's Freedom of Information and Privacy Coordinator can be contacted at Tel: 416-554-3033.**

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