

Greenspace Alliance of Canada's Capital
Alliance pour les espaces verts de la capitale du Canada

Postal address: P.O. Box 55085, 240 Sparks Street, Ottawa, Ontario K1P 1A1 ☐ Tel.: (613) 513-8372
E-mail: contact@greenspace-alliance.ca ☐ Web site: www.greenspace-alliance.ca

August 16, 2017

BY EMAIL: cnsce.ea-ee.ccsn@canada.ca

Ms. Nicole Frigault
Environmental Assessment Specialist
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa, ON K1P 5S9

**Re: PROPOSED NEAR SURFACE DISPOSAL FACILITY PROJECT AT CHALK RIVER
CEAA Reference number 80122**

Dear Ms Frigault,

Since 1997, the Greenspace Alliance of Canada's Capital has worked with community organizations and individuals to preserve and enhance natural areas in the National Capital area, including public and private green spaces, wetlands and waterways.

Having become familiar with the Environmental Impact Study carried out in relation to the referenced proposal, we wish to register our deep concern regarding what we view is an inadequate assessment of the risks associated with the location, technology and timing being considered for this facility.

We find it incomprehensible that the location selected for the facility is so close to the Ottawa River, with many direct and indirect potential pathways for seepage into this major waterway. Surely, less risky sites could be considered further inland from the river.

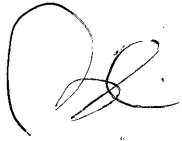
We are perplexed that the proposed technology is little more than a standard landfill such as you might find near major population centres for household waste. It is our understanding that the approach proposed does not meet the international standards for the disposal of the class of nuclear waste that is likely to be stored at the facility. Surely a more heavily engineered solution could be considered given the inherent long term risks associated with the storage of nuclear waste.

Finally, we are dumbfounded at the speed at which this project is proposed to be completed, and leery that this rush to final decision will lead to cutting corners and suboptimal solutions.

It is our view that the consequences of the potential failure of the proposed solution has not been adequately appreciated. Damage to plant and animal life locally and downstream from the facility has not been fully assessed nor have the risks to the health of the more than 1 million residents downstream from the facility.

We encourage the decision makers to step back and consider the full impact of their decision on the ecosystem of the Ottawa valley and the health and well-being of its residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Johanis', with a large, stylized initial 'P'.

Paul Johanis,
Chair, Greenspace Alliance of Canada's Capital
Chair