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CONFIDENTIAL

PEER REVIEW OF THE SOCIAL IMPACT ASSESSMENT COMPONENT OF
WALKER WRIGHT YOUNG'S ENVIRONMENTAL ASSESSMENT OF
REGION OF HALTON'S PROPOSED LANDFILL FACILITY

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SECTION 1. TERMS OF REFERENCE

The Regional Municipality of Halton is currently investigating options for landfilling of 11.3 million cubic yards of solid waste. A detailed environmental assessment conducted by the firm of Walker Wright Young Associates Limited was begun in September 1982 and was completed in July 1985. The environmental assessment process has progressed through four stages of analysis: Stage 1 focused on an evaluation of waste needs and generic process options; Stage 2A focussed on the identification of Candidate Areas; Stage 2B involved the identification of six Candidate Sites; and Stage 2C culminated in the selection of two preferred sites, one known as Site F in the City of Burlington and the other as Site D in the Town of Milton. In conformance with requirements under the Ontario Environmental Assessment Act, an Environmental Assessment document has been submitted to the Ministry of the Environment for review and approval.

The purpose of this peer review is to assess the adequacy of the social impact assessment component of Walker Wright Young's Environmental Assessment as a basis for comparative site evaluation and decision making. The social impact assessment was carried out by Myra Schiff Consultants Limited and is documented in "Final Technical Report No. 5, Phase 2 Stage 2C, Selection of Preferred Site, Social Impact Assessment, June 1985". The SIA focused on the first three of seven "Social Environment" evaluation factors addressed in the Environmental Assessment (the seven factors were population impact, social equity, community facilities, airborne contaminants, noise, visual impact, and land use compatibility) but incorporated the results of the other four technical studies in the analysis of social impacts.

The peer review began in the first week of January 1986 and was completed two months later. It involved in addition to a critical examination of Myra Schiff's draft and final social impact reports:

A close and careful examination of Walker Wright Young's Environmental Assessment, fourteen technical reports (listed in Section 5, Part A), the report of the public participation program, and the compilation of submissions..

Review of the City of Burlington's "Response to Halton Landfill Environmental Assessment: Draft Phase 2 Stage 2C Reports".

A tour of the environs of both Site F and Site D.

Screening of video tapes of Solid Waste Management Committee meetings held in 1985 on July 9, July 10 and July 11; four Regional Council Meetings held Feb. 6 and 20, April 3 and May 8; and a public meeting held at the Aldershot highschool on April 1. 1985

SECTION 2. SUMMARY OF KEY FINDINGS

THE SOCIAL IMPACT ASSESSMENT COMPONENT OF THE WALKER WRIGHT YOUNG ENVIRONMENTAL ASSESSMENT OF THE REGION OF HALTON'S PROPOSED LANDFILL DOES NOT MEET THE MINIMUM REQUIREMENTS OF A SOCIAL IMPACT ASSESSMENT. IT DOES NOT PROVIDE AN ADEQUATE BASIS FOR COMPARATIVE SITE EVALUATION AND DECISION-MAKING.

FIRST AND FOREMOST, THE STUDY DESIGN IS INAPPROPRIATE. IT IS MORE A ROUGH SITE SCREENING METHODOLOGY THAN AN APPROACH TO THE ASSESSMENT AND COMPARATIVE EVALUATION OF SOCIAL IMPACTS AT THE SIX CANDIDATE SITES. IT RELIES FAR TOO HEAVILY ON QUANTITATIVE ANALYSIS AND FAILS TO PROVIDE MORE THAN A COUNT OF THE NUMBER OF PEOPLE, HOUSEHOLDS AND COMMUNITY FACILITIES LIKELY TO BE AFFECTED. THIS IS NOT A SUFFICIENT BASIS OF ASSESSMENT OF SOCIAL IMPACT.

SECOND, THE STUDY WAS POORLY EXECUTED. SERIOUS DEFICIENCIES ARE EVIDENT WITH RESPECT TO ITS ANALYTIC COMPREHENSIVENESS, CONSISTENCY, ACCURACY AND RELIABILITY. OF THE FOUR, LACK OF RELIABILITY IS THE MOST SIGNIFICANT FAILING. SOME OF THE MEASURES DO NOT "MEASURE" WHAT WAS INTENDED OR ARE INAPPROPRIATE. AND DOUBLE COUNTING IS CLEARLY EVIDENT.

GIVEN THE INADEQUACY OF THE SCHIFF STUDY, THE ONLY CONCLUSION THAT CAN BE DRAWN IS THAT THE SOCIAL IMPACTS OF THE PROPOSED LANDFILL HAVE NOT BEEN TAKEN INTO ACCOUNT ADEQUATELY IN STAGE 2C OF WALKER WRIGHT YOUNG'S ENVIRONMENTAL ASSESSMENT PROCESS.

is to determine which mix is most appropriate; there are few guidelines to assist in this task.

TABLE 1 A COMPARATIVE PERSPECTIVE ON SIA

	<u>THE TECHNICAL MODEL</u>	<u>THE POLITICAL MODEL</u>
1. Philosophy of Science:	<u>Logical positivism</u> ; social science patterned on natural science; search for discoverable regularities on which to base prediction and planning	<u>Critical Theory</u> : Social scientists seek to understand the processes and structures of change in order to develop a more humane society.
2. Role and Purpose of Planning	<u>Responsible</u> ; to maximize net social welfare by efficiently facilitating development and minimizing its adverse impacts	<u>Responsive</u> ; to achieve a more equitable process of development by empowering the community to take control of it.
3. Concept of Decision Making	<u>Rational</u> ; choice improved through the provision of comprehensive, accurate, factual information; emphasis on the scientific method	<u>Open</u> ; choice improved through citizen participation; emphasis on articulation of needs and values.
4. Nature of SIA	<u>Technical component of the planning and decision making process</u> ; product focus on the social impact statement; reliance on experts, processed and factual inputs	<u>Community development component of the political process</u> ; process focus on the quality of participation; reliance on the public, personal experiential inputs.
5. Mode of Research	<u>Reductionist and objective</u> ; detached, value and free analysis to identify and predict impacts; oriented to quantification of information; concern with improving research tools and capabilities	<u>Holistic and subjective</u> ; involved, value-laden intervention to clarify the issues; oriented towards qualification of information; concerned with improving communications between local people directly affected and external decision makers

Sources:

Canadian Environmental Assessment Research Council

B. Sadler, "SIA and Environmental Assessment: Some Lessons from the Canadian Experience," ERDA, 15, New York, 1985.

P. Boothroyd, "Overview of the Issues Raised at the International Conference on Social Impact Assessment," School of Community and Regional Planning, U.B.C., Vancouver, B.C., 1983.

Appropriateness: was the study's design -- its "frame of reference" and the methods used -- appropriate and the "best possible" given the nature of the undertaking, the social context under consideration, study constraints, and in light of other approaches and methods available? (1)

Comprehensiveness: taking into account unavoidable constraints, is the SIA complete? are there serious gaps or omissions in the analysis of the undertaking and its potential impacts? (2)

Consistency: were the study methods applied uniformly? are there serious inconsistencies in the application of evaluative criteria? (3)

Accuracy: are there serious errors or misrepresentations? (4)

Reliability: are the analytic results valid? do they appear to be biased? (5)

In addition, the review also involved examination of the public participation process conducted by Ms. Schiff insofar as it was intended to facilitate the social impact assessment and therefore was a determinant of the adequacy of the study. (The question addressed in the review was whether the public participation process, as a method of assessment, was properly designed, conducted and integrated with the study approach.)

Based on the application of the above-specified evaluation criteria and consideration of study constraints, the overall conclusion of the peer review is that the social impact assessment is seriously flawed in a number of respects and, in its present form, does not provide an adequate basis for comparative site evaluation and decision-making. (1) (2)

Findings in support of this conclusion are discussed below. It should be noted that they do not provide support for any argument one way or the other regarding the relative social impact of the proposed landfill facility at Site F compared to Site D. Further and more reliable social impact assessment would be required to make this determination.

Part B: Detailed Findings

1. APPROPRIATENESS. Impact assessments are intended to aid decision-making. The effectiveness of any impact assessment in this regard relies to a considerable degree on the appropriateness of the study design -- the approach taken to the assessment of social issues and concerns.

characteristics -- population dynamics (density, distribution, structure), patterns of daily activity, modes of interaction, ways of life, community identity and sense of place, development goals and objectives -- which will condition the way in which a community perceives and responds to such an undertaking. Second, recognition of contextual differences facilitates the tailoring of general methodologies to the dimensions of the social settings being assessed. This is particularly important in the setting of study boundaries, the scoping of impact issues and concerns, and the development of public consultation and participation processes. And third, in an impact assessment which involves the comparative evaluation of alternative sites, a key function of an SIA should be to foster an appreciation of contextual differences so that social trade-offs and the policy implications of these trade-offs can be taken into account in site selection decision-making. The siting of a landfill facility in the Region of Halton is not simply a matter of choosing the least impacted of six sites. It is also a matter of choosing whether to locate the facility in an urban versus an exurban or rural area. If the SIA is to serve as an aid to sound decision-making, one of its objectives should be to ensure that the social implications of such a decision are understood. (2) (3)

There are contextual differences among the six candidate sites. Site F is the only one which can be considered to be located in an area that is essentially urban in nature. All the other sites are located in what can be considered rural or exurban areas. These contextual differences were not taken into account in the assessment of the social impacts of the proposed landfill facility. In the setting of study boundaries, the selection of factors and subfactors and the assessment of impact significance, the urban nature of Site F was discounted. (The rural/exurban character of the other six sites was also discounted though not to the same degree in that some of the subfactor descriptions took into account the residents' "rural" lifestyle expectations). *F is only one in an urban area*

The reasons for this are straightforward. Site F was not considered by the assessor to be any different contextually from the other candidate sites. It was not considered to be situated in an "urban" area. The site was regarded as being located in a peripheral area of the City of Burlington and not in a central area. Furthermore, its peripheral nature was regarded by the assessor as further reinforced by certain "buffer" areas (vacant land, a hydro transmission corridor, CNR railway tracks, highway 403, etc.). These buffers, it was felt, not only sufficiently distanced the site from the urban neighbourhoods to the south and east but also minimized any perceptual or psychological impact the landfill might have for the residents who lived there. Thus, since no contextual differences were seen, none was taken into account. *|||||*

In the opinion of this reviewer, the rationales for discounting Site F's urban context are specious. Whether the Site is peripheral or central to the city is immaterial. The fact of the ***

economic, demographic, community service, fiscal, social institution, social structure) to include a set of "special" impacts (in particular, fear and other forms of psychological stress, equity concerns, and ethical issues). And to deal with these special impacts the SIA process has to be not only scientifically sound but, more importantly, socially responsive. This point is an important one -- special impacts can't be "dealt with" through scientific analysis alone. Such impacts are not simply problems to be solved; they embrace issues to be resolved. And this requires a demonstrated awareness and understanding of the perceptions and interests (as reflected in needs, concerns, and values) of those who are likely or who see themselves as likely to be affected by the proposed undertaking. The political model of SIA is more suited to this task.

A waste management facility is a project which has uncertainty and public controversy as key characteristics. The presence of "special" impacts was recognized by Ms. Schiff -- she included Emotional Impact as a sub-factor under Population Impact and she added Social Equity to the list of evaluation factors. But this recognition was not acted upon in her choice of the study's basic methodological approach. She adhered strictly to the technical model. The focus was factual information obtained through the application of scientific method. And since such special impacts are not amenable to scientific analysis they were subsequently not used in the ranking of sites. Public participation was used as an aid to technical analysis ensuring that "relevant" factors were being addressed. The process was not structured or intended to facilitate the probing of public concerns and the clarification and explication of interests and issues. This accounts for the product -- a quantified inventory of people and facilities displaced or disrupted, largely devoid of any reference to the "meaning" of such impacts for those affected. *not probe.*

Even if one were to accept the application of a technical model in this case, choices made regarding specific analytic methods and techniques were in themselves inappropriate. First, there was an over-reliance on quantitative methods. Social impact assessment, because of the inherent nature of "social" concerns, must involve a careful integration of quantitative and qualitative analysis. Although reference was made in the study to qualitative concerns, the measures used to assess impact and the method used to rank the sites relied almost exclusively on quantitative variables. This seriously constrained the scope and depth of analysis. Second, no method of factor weighting was applied. No attempt was made to prioritize or otherwise weight the evaluation factors, sub-factors or measures. These are clearly not equal and the decision to treat them as such resulted in some inappropriate analysis (for example, disruption of an established community was given the same weight as disruption of the work of artisans and craftsmen in the study area). And third, the method of scaling used did not involve any attempt to assess absolute significance of potential impacts (i.e., all assessments of impacts were relative; and in some cases instances of no

Social impact assessment generally involves the following tasks, each of which has certain methodological requirements:

SCOPING of the issues and concerns and affected interests to be taken into account in the SIA; involves selecting impact categories, determining impact area boundaries, establishing time horizons, and developing the study design.

PROFILING of the current situation in order to establish a "baseline" condition from which to measure projected changes; involves conceptualizing social system attributes, dimensionalizing impact categories, selecting appropriate measures and indicators, and compiling social profile information.

PROJECTING of possible social implications of the proposed undertaking; involves setting out "state-of-society" and social change process assumptions, and identifying who will be affected, in what way and for how long.

ASSESSING of the relative importance or significance of projected impacts taking into account current social conditions, future conditions in any case, community goals and objectives (their preferred future), and possible mitigation measures; involves explication of evaluation criteria, cross impact analysis to get at cumulative and integrative impacts, sensitivity analysis to test key assumptions, and ranking of impacts.

EVALUATING overall acceptability of the undertaking and its alternatives; involves identifying significant differences among alternatives, clarifying the importance of those differences, identifying trade-offs, ranking and weighting preferences for alternatives, and identifying a preferred alternative(s).

In comparison to what any impact study would reasonably be expected to include, the Schiff SIA fails to meet minimum expectations that are generally agreed upon by impact assessment professionals and that appear in the field's literature.

The study's main deficiencies in this regard are:

① Narrow scoping of study boundaries.

At least three kinds of boundaries are relevant to the assessment of social impacts of any undertaking: boundaries defining the level of social concern (i.e., whether the focus is on individuals, groups and organizations, neighbourhoods and communities, the public at large, or some combination of these); boundaries delimiting the spatial extent of the analysis; and

③ Incomplete and superficial social profiling.

This follows from the above two deficiencies. Narrow study boundaries and narrow conceptualization of social system attributes will necessarily result in poor baseline information. The sociological characteristics of the people and communities likely to be affected are not conveyed in the SIA. One does not get a good sense of the "social" nature of the six sites from a reading of the information provided. Impact predictions and evaluations are only as good as the information on which they are based. To appreciate the impacts and implications of the proposed undertaking for the communities involved, it is necessary first to appreciate their present social condition. The Schiff SIA does not fulfill this requirement.

Shortcomings of the SIA with regard to ASSESSING and EVALUATING were noted above in the discussion of the appropriateness of the study design. One further deficiency, however, should be highlighted and this has to do with the way mitigation was taken into account. It is a principle of impact assessment practice generally to take potential mitigation measures into account in the assessment and evaluation of impact significance. In the SIA mitigation was not properly considered. First, for POPULATION IMPACT, mitigation was taken into account only at the Factor level and not at the Sub-Factor level. Yet it is at the Sub-Factor level that specific impacts are addressed and therefore it is this level that is the more relevant to the discussion of mitigation. Second, when mitigation was considered, the analysis of the feasibility and effectiveness of possible mitigative measures was very superficial. And in one case, at Site F, a proposed mitigative measure (the closing of Bayview Park) is a bogus measure. It does not remove the impact of the landfill; it removes the community facility. The impact is not dealt with; it is compounded. Lack of proper consideration of mitigation measures does not allow for a sound assessment and comparative evaluation of the landfill's impacts on the six sites.

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In conclusion, the SIA does not measure up to a minimum standard of adequacy with respect to its comprehensiveness.

3. CONSISTENCY. A basic requirement of any impact assessment is that it be internally consistent, that is, that it involve the uniform application of analytic assumptions and procedures. Where inconsistencies occur (as they are bound to in any impact study), they should be well justified.

There is one serious inconsistency evident in the approach taken to the SIA study which calls into question the validity of the study results. In setting the study area boundaries, a

4. ACCURACY. Inaccuracies, like inconsistencies, make the SIA look methodologically weak, especially if the inaccuracies result in unreliable findings. Two kinds of inaccuracies have to be guarded against: errors and misrepresentations.

There are two misrepresentations of research findings which invalidate the use and interpretation of two measures.

- ① The rationale for including "the number of households with more than four members" is based on a misinterpretation of research findings.

A study by Michelson (1977) is cited to support the contention that the larger the household the more difficult it becomes to move. The fact is that Michelson's research focused on the intention to move (as a function of family size and dwelling type) and not on difficulties in moving. He found that large families living in high-rise apartments expected to move away while large families in houses did not because this type of dwelling unit was selected for the very reason that it could accommodate their numbers (i.e., there was no need and therefore no intention to seek alternative housing).

- ② Research cited in support of the contention that all people will experience the same amount of stress from living next to the landfill site has been misrepresented.

The fact is that the authors of the research cited, Proshansky et al (1979, in Sarason, Irwin and Spielberger), make the point that the role of physical settings in precipitating or contributing to life crises in individuals "depends not only on what event is occurring at the time but on the person to whom it is happening" (pg. 6). In the assessment of stress from living next to the landfill site, relevant sociological and psychological characteristics of the residents should have been examined and potential differential response to the stressor assessed. By choosing to ignore the above statement, Ms. Schiff undermined the analytic soundness of her assessment and the reliability of her findings.

5. RELIABILITY. There are two basic questions here: are the study results valid? and is the study free of bias? If the answer to either question is no, then the assessment cannot be confidently relied on as a basis for decision making.

Bias is not an apparent problem in the SIA. Validity of the study results is.

income on-site and in the study area, discriminates against less successful businessmen and less wealthy sites. It suggests that the total dollars earned is the important social criterion rather than the fact that people are relying on income earned from activities on-site or in the study area regardless of how successful these activities are.

More importantly, the emphasis in the measures selected is on quantitative variables, as if number of people or households affected is a reliable indicator of potential social impact. Such measures represent simple inventories of population and lead inevitably to the faulty conclusion that there is more impact where there are more people. The numbers of people affected reveals nothing about the nature of the impacts or their social significance and thus is not a reliable basis for comparing among sites.

③ Third, instances of double counting are evident.

For example, the use of both the number of people and the number of households to measure the impact of dislocation and disruption is double counting. It is stated in the SIA report that "households" was included as a measure of disruption of the lifestyle residents enjoy with their families. If the number of family households had been used rather than the total number of households, the measure would have been more valid. As another example, the "number of households with children 16 years and under in the study area" was included among measures used to assess DISRUPTION OF HOUSEHOLDS AND RESIDENTS. It was included to take into account concerns about perceived possible negative health effects, concerns which would affect the sense of well-being of residents. This measure represents an instance of double counting of emotional impacts since "stress from living near the site" also involved counting the number of households with children 16 years and under in the study area.

There are numerous other deficiencies evident in the SIA (most notably insufficient reference to relevant research in support of sub-factors, measures and assessments of impact significance) but these are of a relatively minor nature and unlike the deficiencies noted above do not in themselves detract from the analytic soundness of the study approach or the validity of its results. Thus they do not warrant attention here.

Taken in total, the deficiencies noted above amount to a seriously flawed study. Given the problems evident in study design and execution, the only conclusion that can be reached is that the SIA should not be considered a social impact assessment. It is more a rough site screening study. And because of its inherent deficiencies, it does not provide an adequate basis for comparative site evaluation and selection.

Schedule 25: Compilation of Submissions, Book 2 of 2,
Citizen's Groups, Individuals, April 1985

Schedule 26: Compilation of Submissions, Addendum 1 of 2,
Various Responses, April 1985

Schedule 27: Compilation of Submissions, Addendum 2 of 2,
April 1985

Schedule 40: Stage 2C Final Evaluation and Summary Report,
June 1985

Schedule 41: Public Participation Program, September 1985

Schedule 44: Final EFW Environmental Report, August 1984

Review and Supplement to Stage 2B, October 1984

Interim Report on Public Concerns and Issues, Phase 2, Stage
2C, June 1984.

Part B: Selected SIA References

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Facilities. Toronto: IER, 1979.

for the social impact assessment, taking over from the Institute of Environmental Research Inc.

Certain study design decisions had been made prior to Ms. Schiff's involvement in the EA process. For example, six social environment evaluation factors had been identified: population impact, community facilities, airborne contaminants, noise, visual impact, and land use compatibility.

Ms. Schiff added the factor, social equity, to the list of social environment evaluation factors in response to concerns raised by potentially affected residents. She also selected the five sub-factors to be considered in the assessment of population impacts (these included dislocation of households and residents on site, disruption of households and residents in the study area near the landfill, emotional impacts, disruption of an established community, disruption of unique and special population groups).

Q. WHAT INVOLVEMENT DID SHE HAVE WITH THE OTHER IMPACT STUDIES BEING CONDUCTED AND HOW WERE THE RESULTS OF THESE STUDIES INTEGRATED WITH THE SIA?

Ms. Schiff's social impact assessment focused on population impacts, social equity and community facilities. The other social environment evaluation factors were addressed by other consultants. Ms. Schiff did not have input to the study approach taken by these consultants (Ms. Schiff considered the assessment of such factors to be outside her area of expertise). However, she maintained close contact with these consultants as their studies progressed and worked with them to interpret the results of their studies in terms of their relevance to the social impact assessment.

The assessment of "Public Health and Safety" was also conducted as a separate study. However, the hydrogeologist was always in attendance at small group workshops conducted as part of the SIA public participation process and the results of this assessment were available to Ms. Schiff prior to the completion of the social impact assessment.

Q. WHY WAS THE CANDIDATE SITE AREA BOUNDARY USED AS THE STARTING POINT FOR THE SELECTION OF STUDY AREA BOUNDARIES?

The candidate site area boundaries rather than the site plan area boundaries were used as the starting point for the delineation of study area boundaries for two reasons. First, the CSA boundaries encompassed a larger area than the SPA boundaries (with the exception of Site F where the two boundaries coincided). Using the CSA as the starting point for the delineation of study area boundaries ensured that the SIA had a sufficiently broad geographic scope. And second, and more importantly, at the time the SIA began the CSA boundaries were considered more fixed than the SPA boundaries. The SPA boundaries that were in place in

this concern was discounted for two reasons: the proposed landfill would be further away from the industries in question than the landfill they are neighbours to at present, and one of the industries, despite its proximity to the existing landfill, expanded its facilities which suggests that proximity to a landfill is not detrimental to ~~the~~ such industries.

Q. WHAT WAS THE RATIONALE FOR USING A QUANTITATIVE APPROACH?

In developing the study approach, Ms. Schiff chose to emphasize quantitative factors for two reasons: scientific rigour could be more easily assured and the study results could be replicated.

Q. WHY WERE THE FACTORS AND SUB-FACTORS NOT WEIGHTED AND ASSIGNED RELATIVE PRIORITY?

The decision not to use a weighting methodology (to distinguish the relative importance of the factors, sub-factors, measures) was made by the EA study team. ← *walker?*

Q. WERE DIFFERENCES IN SOCIAL CONTEXTS TAKEN INTO ACCOUNT? WHY WAS THE URBAN CHARACTER OF SITE F DISCOUNTED?

The six sites were not regarded as being different in terms of their social character. Site F was not seen to be different in character from the other sites. It was not regarded as "urban" since it was not in the heart of the City of Burlington. In any case, it was felt that recognition of differing degrees of "urban" or "rural" character would not be helpful to the assessment of social impacts since there is no readily apparent basis for evaluating the relative merits of an urban versus a rural location for a landfill.

Q. DID COMMENTS OF THE AFFECTED PUBLICS ON THE DRAFT REPORT RESULT IN ANY SIGNIFICANT CHANGES TO THE SIA?

Public comments were taken into account as the report was being revised and changes were made to the report on the basis of those comments.

In January 1986 I was hired by the City of Burlington to carry out a peer review of the social impact component of the Walker Wright Young Environmental Assessment of Region of Halton's proposed landfill facility. The peer review was completed over a two month period and a report of findings was prepared and submitted to the City on 5 March 1986.

The terms of my contract with the City called for a determination, based on my peer review findings, of whether and what kind of further social impact work should be undertaken to assist the City of Burlington to prepare for the Environmental Assessment Board Hearing. This report addresses this concern.

The overall conclusion of the peer review was that the social impact assessment component of the Walker Wright Young EA failed to measure up to minimum standards or expectations of professional practice in the SIA field. It is seriously flawed and does not provide an adequate basis for comparative site evaluation.

The City of Burlington at this point has at least three options in terms of responding to the peer review conclusion:

1. Re-do the social impact assessment.
2. Re-do the social impact assessment but only for Sites F and D.
3. Do not do any further social impact assessment work.

There are few advantages to Option 1 and considerable drawbacks. At best it would result in a re-ranking of the six sites and, if properly conducted, it would provide a clearer indication of the relative significance of social impacts at all six candidate sites. If Site F were to emerge as more impacted than any other site and if sound information could be provided to demonstrate the seriousness of the social impacts at Site F and the significance of trade-offs involved in selecting Site F instead of other less impacted sites, then the City would have a stronger case to make at the EAB than at present. The most obvious disadvantage of this option is its cost. The Schiff study cost approximately \$68,000. Re-doing her study would not be a simple matter of re-working her data since there are significant gaps and errors evident in her analysis. In addition to further research and analysis, extensive public consultations would be required. Thus the cost of re-doing the SIA could be expected to range anywhere from \$100,000 to 150,000. The other serious disadvantage is the time that would be required to complete such a study. It is unlikely, given the expected early fall hearing date, that the assessment would be completed in time for the hearing.

It does not seem appropriate that the City of Burlington should have to bear the costs and responsibility for ensuring a proper social impact assessment of the six sites. The onus should be on the Region to produce a sound assessment. Option 2 takes this

Taking into account the advantages and disadvantages of each of the three options, it is my recommendation that Option 3 be adopted. Further SIA work does not appear to be warranted in terms of cost or potential benefit to the City's case to the EAB.



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