



City of Dryden
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Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street
Ottawa ON K1A 0H3

Via Electronic Submission

City of Dryden Submission to the Impact Assessment Agency of Canada (IAAC)

Re: Draft Integrated Tailored Impact Statement Guidelines – NWMO Deep Geological Repository Project

Dear Members of the Review Panel:

The City of Dryden appreciates the opportunity to comment on the Draft Integrated Tailored Impact Statement Guidelines for the proposed Deep Geological Repository project.

From Dryden's perspective, it is important to be clear at the outset that the City is not simply a nearby municipality that may experience limited indirect effects. Dryden functions as the primary service and economic hub for a large portion of the surrounding region, and as a result, the City will experience meaningful and sustained impacts across all phases of the project.

With a population of 7,344, Dryden directly serves a regional population of over 12,000 people, including the Township of Machin, the Municipality of Ignace, Eagle Lake First Nation, Wabigoon Lake Ojibway Nation, surrounding unincorporated areas, and other neighboring First Nation communities. When considering broader service use, the population relying on Dryden is closer to 22,000 residents.

Healthcare, social services, education, justice services, utilities, retail, and employment opportunities are all concentrated in Dryden to serve this wider region. Any significant industrial project in proximity to Ignace or Dryden will, by extension, place pressure on these systems in Dryden.

For that reason, the City expects that the Impact Statement clearly recognize Dryden as a regional service hub and include it within the core local study area for socioeconomic effects. If the analysis is focused substantially on the immediate host community, the scale of impacts—and the mitigation required—will be understated.

Dryden's role as a service centre is closely tied to its Indigenous population and its relationship with surrounding First Nations. According to the 2021 Census, 19.5% of Dryden's population identifies as Indigenous, with significantly higher representation across the broader Kenora District. It is estimated that the actual Indigenous population in Dryden is closer to 22%. The City serves as a key access point for healthcare, social services, justice, education, employment, and retail services for Eagle Lake First Nation and Wabigoon Lake Ojibway Nation as well as other area First Nation communities.



There are already well-documented pressures within these systems, particularly in healthcare, housing, and education infrastructure. These pressures often affect Indigenous residents more acutely. The introduction of a large-scale project such as the DGR has the potential to intensify these challenges.

The City expects that the Impact Statement apply a rigorous GBA Plus lens and clearly identify how project-related impacts may disproportionately affect Indigenous populations accessing services in Dryden. Where those impacts are identified, mitigation measures should be specific and targeted, including supports that are culturally appropriate and responsive to community needs.

Housing is one of the most immediate and pressing concerns.

Dryden is already experiencing a shortage of housing across most segments of the market. While precise vacancy rate data is not available, the City has seen consistent upward pressure on rents over the past several years, driven by limited supply. It is estimated that the rental unit vacancy rate is under 3.0%, with rental rates for modern units ranging from \$1,575 to \$2,345 monthly or higher. As of February 2026, there were 554 active applications for subsidized housing. At the same time, 179 new housing units were added between 2023 and 2025, which, on a per capita basis, represents aggressive growth and has already placed additional strain on municipal infrastructure and services. Without development charges or other mitigation measures, this growth rate has and will continue to cause significant financial hardship for Dryden taxpayers.

Given the lack of reliable baseline data, it is essential that the Impact Statement include a comprehensive housing impact analysis for Dryden. This analysis should examine workforce-related demand during both construction and operations, the potential effects on rental availability and pricing, and the impacts on vulnerable populations.

Mitigation cannot be left at a high level. It should include clear strategies for workforce accommodation, measures to prevent displacement of local residents, and funding for the infrastructure required to support housing development.

From an infrastructure and municipal service standpoint, Dryden is already operating under significant financial and capacity constraints.

The City is managing an infrastructure deficit in the range of \$360 to \$370 million. While there is some available capacity in the water and wastewater treatment plants, the distribution and collection systems require ongoing investment. The municipal landfill has an estimated 10 to 15 years of remaining capacity under current conditions, which will be reduced under growth scenarios. Many of the municipal facilities are already at capacity and/or at their end of life.

At the same time, municipal services are heavily subsidized by local taxpayers. In 2024 alone, the total taxpayer subsidy for core services was approximately \$6 million. Roads, fire protection, library, recreation, and other services operate with high levels of property tax revenue subsidy while being used by a broader regional population that does not contribute proportionally to those costs.

The City cannot absorb additional demand without external support.

The Impact Statement must therefore include a detailed assessment of how the project will affect municipal infrastructure and services in Dryden, including roads, water and wastewater systems, solid waste, emergency services, and community facilities. Just as importantly, it must identify the associated capital and operating costs and clearly outline how those costs will be addressed.

Emergency and social services represent another area of concern.

Dryden operates a composite fire service with a small full-time complement supported by volunteers (paid per call). Policing is provided through the OPP, with local policing costs already among the highest in the province. Healthcare services in the region are at or near capacity, and social services are delivered through the Kenora District Services Board, which is funded in part through municipal levies as is long-term care and public health.

There are structural imbalances in how these services are funded, particularly where services are accessed by residents outside the municipal tax base. Additional population pressure will only exacerbate these issues.

The City expects a full assessment of impacts on healthcare, long-term care, emergency response, policing, and social services, along with clearly defined mitigation measures. These measures should include funding for expanded capacity, as well as support for workforce recruitment and retention in critical sectors.

Labour market impacts are also expected to be significant.

Dryden is already experiencing labour shortages across multiple sectors, including skilled trades, healthcare, education, municipal operations, and the retail/service industry. Recent experience in the forestry sector has demonstrated the sensitivity of the local labour market, with wage increases of approximately 20% affecting municipal operations.

With additional resource and energy projects anticipated in the region, the DGR project will add further pressure to an already constrained labour market. This will have direct implications for municipal operations, housing development, healthcare delivery, and the broader economy.

The Impact Statement should include detailed labour market analysis for Dryden, including workforce sourcing assumptions, potential displacement effects, and projected wage and cost-of-living impacts. Mitigation should focus on workforce development, training, and measures to protect essential services and existing key employers from labour shortages.

Transportation and safety impacts also require careful consideration.

Highway 17 is already recognized as a high-risk corridor in Northwestern Ontario, and increased traffic associated with construction and operations will add to existing safety concerns. Seasonal tourism traffic and industrial activity further complicate this picture.

The City expects a thorough assessment of traffic volumes, safety risks, and emergency response implications, along with mitigation measures such as highway improvements, traffic management

strategies, and appropriate investment in supporting infrastructure, including the Dryden Regional Airport.

It is also important to acknowledge that there are significant data gaps at this stage.

Dryden is requesting that the Impact Statement, through a focus on Dryden, include:

- A comprehensive housing impact analysis
- A full assessment of municipal infrastructure and service capacity
- Detailed analysis of healthcare and emergency services impacts
- Labour market and cost-of-living modelling
- Scenario-based modelling across multiple growth assumptions
- A cumulative effects assessment that considers other regional developments

These studies must include proper mitigation measures to fully address identified gaps. Schedule A (attached) outlines the mitigation framework Dryden is recommending.

At a broader level, the City's position is straightforward.

Any socioeconomic impacts resulting from the project must be fully mitigated. This includes both capital and operating costs, and it must account for direct, indirect, and cumulative effects over time.

At present, there are no finalized agreements in place between Dryden, the proponent, and/or senior government that would provide the necessary level of mitigation funding. As such, the Impact Statement must clearly identify what mitigation is required and how it will be delivered.

Dryden is recommending that the hosting agreements developed and agreed to by the Nuclear Waste Management Organization for both the Municipality of South Bruce and the Township of Ignace form the baseline mitigation, on a per capita basis, for Dryden. From that baseline, all unmitigated impacts identified through the required analysis should be further mitigated.

Finally, Dryden expects to be meaningfully engaged throughout the process.

The City is requesting that a formal and ongoing consultation process be established, with a commitment to share all relevant data and analysis in a timely manner. This should include any impact assessments prepared for other jurisdictions.

Equally important is transparency around how municipal input is being considered. The process should clearly demonstrate how feedback from the City of Dryden is influencing project design, mitigation measures, and overall decision-making.

Dryden plays a critical role in supporting the surrounding region. That role must be fully recognized in the impact assessment process.



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The City's expectation is that the project proceeds, if at all, in a manner that does not place additional strain on Dryden's municipal infrastructure, services, or taxpayers, and that ensures long-term sustainability for the community and the region it serves.

Respectfully submitted,



Jack Harrison

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The Honourable Tim Hodgson, P.C., M.P., Minister of Energy and Natural Resources

The Honourable Julie Dabrusin, M.P., Minister of Environment and Climate Change

The Honourable Stephen Lecce, M.P.P., Minister of Energy and Mines;

The Honourable George Pirie, M.P.P., Minister of Northern Economic Development and Growth;

The Honourable Greg Rickford, M.P.P., Minister of Indigenous Affairs and First Nations Economic Reconciliation, M.P.P. for Kenora-Rainy River;

The Honourable Robert Flack, M.P.P., Minister of Municipal Affairs and Housing

The Honourable Mike Harris, M.P.P., Minister of Natural Resources

Mr. Eric Melillo, M.P., Member of Parliament for Kenora—Kiiwetinoong;

Mr. Robert Buhr, Senior Project Officer, Canadian Nuclear Safety Commission;

Ms. Laurie Swami, President and CEO of the Nuclear Waste Management Organization