

A BRIEF HISTORY IN TIME FOR BROCKLEY AND SHAVER

- * In 1867—41 years after London's incorporation—the earliest home was built in the area south of London which would officially come to be known as **Brockley** in 1926. Brockley was an important enough community to merit a small station stop on the LPS Rail Line.
- * **Shaver's** history is approaching $\frac{3}{4}$ of a century.
- * These rural settlements continue to be surrounded predominately with agrarian land.
- * In 1983, hoping to avert amalgamation by the City (in part by heightening its own revenue base), the Twp. of Westminster--*without neighbourhood input*--earmarked some area surrounding our rural settlements with a Light Industrial designation. Since most of this land is still being farmed, our neighbourhoods asked for reconsideration of this designation at the time of the London South West Area Plan, indicating that although we were opposed to Industrial designation, and were petitioning for residential zoning because of our 2 existing rural settlements, we were nonetheless aware that it would make sense for commercial development to continue along Wellington Road. Our request for allowed expansion of our neighbourhoods was unsuccessful; and the buffer zone between residential and Light Industry we petitioned for ended up being more limited than we had hoped. However, the City agreed to restrict the nature of light industry in the area to what might be compatible with residential areas.

Unfortunately, Orgaworld and Stormfisher Biogas could not be more *incompatible* with residential neighbourhood.

UNWELCOME NEIGHBOURS

1. *Orgaworld*

- * *Orgaworld* invaded our neighbourhood in **2006**, again with **NO neighbourhood consultation**, and **placement advised against by local MOE officials**.

[These are 2 of the sorest points with us. Had the City recognized the dissonance of a composting facility adjacent to our two residential communities, and had the Provincial MOE listened to its local counterpoint and not placed Orgaworld on its present site—but rather in an appropriate place like the W12 Compound--the Ministry, the City, we and Orgaworld would have been spared all of the fallout that has and continues to rain down. Orgaworld spent 17 million with initial construction. Now that facility has added more than 18 million of "final fixes," and things have improved little, if at all. So even after construction, it would probably have been more cost effective to have relocated the plant while it was still in its infancy, and quite frankly even now to consider relocation when one considers the amount of time and costs which subsequently have, and which continue to drain MOE personnel and resources—literally

thousands of hours by personnel there: environmental officers, scientific experts, supervisors, directors, inspectors, legal council. These costs are continuing, so it's truly shocking. And the situation for our neighbourhoods has been and continues to be a nightmare.]

- * **Even a former Mayor (Joe Fontana) conceded in a public meeting that *Orgaworld* should *not* have been located where it is.**
- * The plant has been through endless “final fixes” by OCL, including a **5 million “retrofit” in 2010** when shut down after an overwhelming number of complaints were registered that year. However, well **after the retrofit, in 2012, more than DOUBLE the number of complaints were documented over the number in the year the plant was forced to “volunteer” to shut down.** This can hardly be called engineering success.
- * In the years since 2012, complaints continue to be filed routinely; and indeed at mid year in **2017** more than 50 % of the number of complaints filed in the year of shutdown have already been documented for this year. So the problem has hardly been solved.

What We Have Suffered:

- * Odour issues from Day 1; a **“Zero Odour” promise in a public meeting by Orgaworld** (and reported in the *London Free Press*), **which promise was a few years later reversed**; lies; threats; and literally **thousands of calls to report odour**; not to mention **violation of our municipal rights**. We have even been blamed for being victims; and OCL claims we are the authors of our own misfortune—especially in terms of real estate value--because we have made their violations public! As importantly as what we have been through, is the **genuine concern we feel for our health** in the future. At this point we have no idea of the quality of the air we—and *all Londoners*--are breathing with emissions from *Orgaworld*, *Stormfisher* and *Ingredion* contributing to the atmospheric mix, nor what future health impacts these might have.

The following news article is a sober reminder of the worrisome air quality in London. It is a 2010 study--we tried to find more recent data--but it is our belief that the statistics are still relevant and reliable . . . and we would not doubt but that the situation has grown worse.

Ontario

3.

KATE DUBINSKI AND JOHN MINER, THE LONDON FREE PRESS

Friday, January 8, 2010 11:10:15 EST AM

*“More toxic chemicals are pumped into the skies over the **London region** than anywhere else in Ontario, a just-released report by environmental groups warns.*

At more than eight million kilograms of toxins a year, not counting what blows in from the industrial U.S. midwest, the air discharge is 40% higher than the pollutants released above Canada's largest metropolis, the Toronto area, which ranks second in Ontario.

More than 6% of the pollutants released are suspected of causing cancer, while more than 9% are linked to reproductive and developmental defects. Examples of chemicals released include benzene and arsenic

MOST POLLUTED AREAS

Annual toxic air releases in millions of kilograms:

- 1 London region: 8.05*
- 2 Toronto area: 5.75*
- 3 Lake Erie region: 4.43*
- 4 Halton-Hamilton: 4.21*
- 5 Lakehead (Thunder Bay): 2.3”*

kate.dubinski@sunmedia.ca john.miner@sunmedia.ca

Surely these statistics are something of which the City can hardly be proud, and perhaps it's sadly appropriate that the Regional Cancer Hospital is located in London. No wonder “Cabbage Town” wants to send its garbage down the 401 to “Garbage Town.” The City of London and the Province need to take this data seriously, and subtract rather than add polluters to the already highly polluted air in London. Obviously the air south of Hwy 401 doesn't stay south of the 401, so Londoners are all at risk, and all London citizens and their representative Councillors should be very concerned.

Neighbourhood Petition:

- * Naturally, given sad and bad experience with *Orgaworld*, the rumor that a second composting plant might be invading the area left residents of Shaver and Brockley in shock; and consequently in April of 2010 we sent the City a petition signed by an individual from most households begging the City and MOE **NOT** to allow another plant of like ilk to invade the area, warning that malodour would be inevitable, and would only

4.

exacerbate problems already experienced. Of course we knew that the plants would blame one another, and we predicted that only foulest malodour could come from a plant taking rotting meat as part of its feedstock.

2. Stormfisher Biogas

* Nevertheless, despite continuing malodour by *Orgaworld*, **Stormfisher Biogas/ Harvest Power/ Energy Garden still was allowed to build**, and of course immediately started to offend, and also continues to offend in the most obnoxious of ways.

* Already—in its short life--there have been **numerous complaints registered about malodour from that plant to date: 147 in the year 2015, increasing to 253 in 2016**, and the smell is literally one of putrescence. Given the population in the immediate area, this is an unthinkable number of complaints.

[So this is another very sore point with neighbours: that a second offending plant would be permitted literally on the door step of Brockley, and insult upon injury, just across the fence from the oldest home in our neighbourhood built in 1867—and this after multiple appeals and warnings to the City and the MOE. Experience has borne the sad clarity of our predictions out in a major way: and the situation is now even more exacerbated in terms of malodour for our community.]

To sum: WE HAVE BEEN THROUGH TEN YEARS OF VIOLATION

- * **Thousands** of repeat offenses of malodour
- * **Thousands** of phone calls to report malodour
- * **Thousands** of pages of documents citizens at various levels of engagement have been expected to review: 7000 +
- * **Hundreds** of violated events on properties
 - inability of children to play outside their homes
(and even necessity to shut windows at Westminster Central School)
 - BBQ's and backyard social events aborted
 - inability to walk dogs, jog, or cycle at specific times
 - gardening interrupted
 - family holiday events and other special events spoiled, including the occasions of **3** weddings when Orgaworld came either to set-up, wedding or reception as an uninvited guest
- * **Hundreds** of hours of PLC/ ZOAG/ Neighbourhood Meetings
- * **Over 300** pages of written correspondence from our neighbourhood, a significant number of pages which were written to City officials

5.

- * **An Environmental Review Tribunal**, all 50 hours attended by neighbours, but not 1 City official
- * **Unwanted Publicity**, public humiliation, threats
- * **Devalued Property and Prolonged Selling Process of Homes**
- * **Concerns for our Health**

*[These are all very serious injustices. **No ordinary citizens living peaceably in a neighbourhood, working hard, paying taxes, trying to raise families and enjoy life in the process should be through what we have been through.** At the ERT, a Coalition of 6 neighbours attended all hours of the proceedings on behalf of the neighbourhoods, and they and the lawyers and arbitrator were the only constants. Two Coalition members had actually taken time off work without pay to participate. Other “witnesses” drifted in and out, including 3 “experts” from the Netherlands who drove around the community for 3 hours, and then came to the tribunal and testified under oath that they had smelled all kinds of odour in the vicinity of Orgaworld that day: Ingredient (then known as Casco), agricultural smells, and even W12 which is a good 6 kilometers from Brockley, and which we as far north as Dingman Drive believe we have NEVER smelled. This claim was absolutely ridiculous because the locals whose noses are fine tuned to the odour emitted from each of the facilities in the area smelled nothing in their neighbourhoods that day. In any event, what the City and Provincial MOE are allowing to happen to us is just plain cruel, and IT IS the local MOE’s provincial counterpart that is responsible because the tool box given the local MOE is extremely limited, and it is obvious to us that political decisions at higher levels are trumping citizen rights.]*

MORE NUMBERS FROM ANOTHER ANGLE:

The Story of . . .

- 2 - Number of Offending Companies**
- 150 - Number of Homes in Immediate Impacted Area**

Some People We Have Dealt With . . .

Orgaworld

- * 9 different managers
- * 5+ personnel from afar
- * 5+ chairs of PLC’s

Stormfisher Biogas

- * already multiple owners and staff

Local Ministry of the Environment

- * 8 Environmental Officers, 3 Project Coordinators
- * 7 District Managers
- * 9 Supervisors
- * 4 Regional Directors

City of London

6.

- * 3 Mayors
- * 28 Councillors
- * 15+ City Staff

Government

- * 1 local MP
- * 2 local MPP successively

During this time there have been **6 Ministers of the Environment!**

[The point here is that we citizens have been the single constant witnessing this cavalcade, and unfortunately are revolving door deflects continuity and empathy. Officials may attend an occasional meeting in our area, smile, shake hands and get in their cars and drive away at the end of the meeting to their odour-free homes and yards. But we live in our neighbourhoods 24/7, month after month, year after year. The turnover of personnel mentioned above only shows how long the crisis has gone on for us, and how stressful the work must be for those on the front line—especially at the local MOE. Part of the difficulty for us is that each new appointee just gains an understanding of the situation only to be whisked off to another department or geographical assignment. We believe this is in part a reflection of the stress of the job, but also a technique to wear down citizens, and relocate personnel who have grasped the true nature of how critical the situation actually is for Brockley and Shaver citizens.]

The same is true of the process we are forced to go through in calling in complaints. One interrupts a busy life to call only to get put on hold, sent on automated goose chases, and then if fortunate enough to reach a living person at SAC or a plant, one has to start the process all over, providing information with delays for personnel to record data in between each detail as if one had never called before—instead of “This is Caller 19, Winds from the SW, Signature Malodour of rotting garbage from Orgaworld at intensity of 8/10. Goodbye.” No working person has time to spend 15 minutes trying to report each transgression, and we have asked for an expedited system of reporting for 9 years. Don’t tell us in this day of technical wizardry that a better faster system of reporting is not available. So of course we recognize this as a deliberate technique to attempt to discourage neighbours from calling in to report malodour; and given the rigamarole, the number of calls that have been made is incredibly compelling.]

[One additional commentary on numbers is that the total number of complaints (now exceeding 3000), or the total number of homes in the immediate impacted area (approximately 150), or locations from which complaints have been called (a total now of over 200 unique locations according to the MOE—so even exceeding the number of homes) is that is that numbers might look insignificant in light of London’s population. So 1000 citizens might be impacted: who cares? But seen another way, the number of different residential locations from which calls have been registered represents fully 95% of the homes concentrated in the two neighbourhoods. And in the case of Stormfisher for 2016 alone, the number of calls is nearly quadruple the number of homes in the area. We also understand from recent conversation with officers at our local MOE that if complaints come within a close time frame or from a single geographic area, these complaints are now registered as a single “Incident Report,” which unfortunately conceals the actual number of complaints called in. And of course it is widely recognized that for every person who takes time to call, the conventional average is that there are 10 who are similarly bothered, but simply cannot take the time to call. In fact, in the article “15 Statistics that Should Change the Business World,” the charge is made that for every complaint registered, there are 25 other unhappy people! So real numbers of citizens offended are much higher than reported—and even

more so if one also adds to complaints made by citizens who know the source, the aggravation to London citizens in the Whiteoaks or Summerside areas north of Hwy. 401 who don't know the source of aggravating odour they may be smelling and simply don't call.]

[It should also be said that Orgaworld throws out the fact that it pays a lot of taxes, with subtext to be understood that it "therefore has the right" to violate our lives. In 2012 the amount of taxes OCL proudly announced it paid was \$175,000. Well many of our homes are paying triple what houses in neighbouring subdivisions of Whiteoaks and Summerside might pay—several exceeding \$10,000. a year (and this with our providing our own expensive water and septic systems), so we know taxes on homes and other compatible businesses in the impacted area far exceed Orgaworld's paltry contribution by many hundred thousands.]

[Seen yet another way, if taken collectively, the number of offences made by the two offending companies about which we complain is staggering—a total of approximately **475** which were complained about **in 2016 for Orgaworld and Stormfisher alone**. After the ERT "settlement, Orgaworld was pressed by the MOE and actually committed itself to abide by conditions which mandated "no SSO odours," and **only 2 noticeable odours within a 6-month time frame.**" But Orgaworld in 2016 averaged nearly 2 complaints a week, and to the end of July in 2017 this had increased to an average of 5 complaints a week (147 in 30 weeks). Taking this 2017 average for Orgaworld, this could total **260 for the year—not the 4 allowable offences a year** (2 in 6 months x 2). But fairness would dictate that Ingredion be granted the same number, bringing the total of allowable offences to **520**. Naturally in the spirit of fair treatment, Stormfisher Biogas would demand odour equality, so we now are at **780** allowable offences a year. Add to this a like number of offences for W12 or BFI, and one is now up to **1040** allowable offences a year. In other words, the City and Provincial MOE would be allowing odour incidents triple the number of days in the year—so one can see how ridiculous the situation actually could become.

OUR EXPERIENCE WITH THE CITY OF LONDON

- * **Deflection of Initial Calls** ("Sorry, not our issue, call the MOE")
- * **Initial Refusal to Meet** (It actually ended up taking our MPP at the time to convene a meeting with the Mayor and other City officials and this in the year 2008, more than a year after first requests had been made for a meeting.)
- * **Refusal to Acknowledge Any Real Responsibility** (Indeed, to date)
- * **One Meeting with Neighbours at City Hall in November of 2012** (at which meeting Orgaworld, for example, had testimonial from a couple from Dutton, 50 kilometers away from the smell, to extol the virtues of the plant.)
- * **Promise for "greater involvement" by the City**
- * **Subsequent Intermittent Attendance at PLC's by Ward Councillors from Wards 12 and 14, and one staff member from London Environmental Services** **BUT unfortunately . . .**
- * **No concrete ACTION to deal with the offenders or to eradicate malodour from our area.**

CITY RESPONSIBILITY *(as articulated in a December 2009 letter we received from then Minister of the Environment, the Hon. John Gerretsen)*

- * Land use planning
- * Zoning bylaws
- * Setting policy that designates areas for different categories of industrial and commercial use
- * Building permits
- * Municipal bylaws

MOE RESPONSIBILITY *(Also stated in the letter from the Hon. John Gerretsen)*

- * to ensure facilities operate in accordance to Ontario's Environmental legislation

*[We are absolutely convinced that local MOE's should have much more power: power to actually close an offending plant in a timely fashion, just as we as individual citizens would be ordered to stop offending behaviour **immediately** if we were shooting coons, or making fish fertilizer in our back yard and violating the law, or quite frankly if offending even 1 neighbour.]*

- * The local MOE has pushed both companies to engage with the community and they have utilized all they have in their toolkit. They have in essence forced the "voluntary" OCL shutdown, pushed the company to an ERT, and to prosecutions in
 - 2012** - conviction of 2 offences: **\$15,000. fine**
 - 2013** - conviction of 2 offences: **\$60,000. fine**
 - 2014** - conviction of 1 offence: **\$200,000. fine**
 - 2016** - **10 charges sworn relating to 2015,**
currently before the courts

VIOLATIONS WHICH GIVE ELECTED OFFICIALS THE RIGHT and RESPONSIBILITY TO ACT ON OUR BEHALF:

1. Violation of Certificate of Approval

Quote from p. 30:

"The Site must be operated and maintained in an environmentally acceptable manner which does not result in an *adverse effect* or a hazard to the natural environment or any person." *(Believe us, every call reflects adverse effect or we wouldn't be taking the time to call.)*

Additionally, that the offenders are within the “one odour unit” is laughable. A normal nose would not be able to smell a one odour unit. So the *Orgaworld stack tests are a joke since they only test the stack emissions at a specific moment, not the surrounding areas which are impacted on an ongoing basis.*

2. Violation of the Environmental Protection Act

Part II, Section 14 forbids:

* **impairment** of the natural environment **for any use that can be made of it . . .** (*But if one can't breathe the air without recoiling, the environment of the air is being impaired, and this with repeated violation—for example at the golf driving range across from Orgaworld, other businesses in the area, and of course on our properties*)

* harm or material **discomfort of any person** (*Every single complaint has been a registering of discomfort to our olfactory senses.*)

* **loss of enjoyment of normal use of property** (*Every aborted event or interruption of use of property illustrates loss of enjoyment of property.*)

3. Violation of the Municipal Act

which protects citizens from things which have **negative social, environmental, or health impacts.** (*Citizens in the area maintain all three areas are being violated.*)

IT IS CLEAR THAT ORGAWORLD HAS NOT, AND BY THE OWNERS' OWN ADMISSION CAN NOT AND WILL NOT OPERATE WITHOUT CAUSING MALODOUR. We believe this to be the case because:

1. **The original engineered design was flawed, and has been so radically adapted subsequently that it cannot ever perform without malodour.**
2. **Orgaworld cannot control the weather. And the same goes for Stormfisher Biogas.**

IN SHORT, THESE PLANTS ARE FAILED EXPERIMENTS.

SO WHAT ARE THE OPTIONS?

OPTIONS FOR THE CITIZENS OF SHAVER AND BROCKLEY:

In almost all communications from our communities to the City we have made positive suggestions, posed possible solutions. We care about our City and its image, but the City has not demonstrated care about citizens in Shaver and Brockley. In fact, one former Councillor said with some impatience, “There is *nothing* the City can do about *your problem.*”

Well our problem now becomes the City's problem.

10.

At this point, we are crossing the Rubicon. We have participated in literally thousands of hours of activity over nearly 10 years without satisfaction. Unfortunately we are being driven to consider seriously options which include the following:

- * Civil Disobedience
- * Legal Action
- * Going Public

SOME OPTIONS WE PROPOSE FOR THE CITY OF LONDON:

- * **Support your citizens as other Municipalities in this province and across Canada have had the courage to do.**
- * **Order an interim blanket reduction of taxes in our area, and increased taxation for offenders until the problem is solved.**
- * **Draft an Odour Bylaw with specific reference to *malodour from composting* plants that take horrendous feedstock. Adopt ambient odour criteria.** *[It should be noted that we are not talking about food-producing plants, so the argument that has been used that an Odour Bylaw would have impact for Labatts or plants like it or the now defunct Kellogg's is nonsense! Check to see how many complaints have been filed against Ingredion by residents from Shaver of Brockley over the last 40 years it has been in existence: precious few, even though we often smell its corn-syrupy smell, and there have been sporadic hydrogen sulphide days about which all citizens in London naturally should be very concerned. But our quarrel is with stinking **composting** plants. That should not be a hard distinction to make or to mandate against in an Odour bylaw!]*
- * **Shift costs of follow up and monitoring to offending plants.**
- * **Ban renewal of any contracts an offending plant may have currently.**
- * **Zone a special buffer around both residential communities based on historicity of these rural settlements.** . *[At the moment we feel the buffer to be severely restricted, and we can't help but wonder if "hearings" over boundaries are a bit rigged. When we have asked for re-zoning in our area the response is always: "Oh we can't do that: buyers have bought "industrial lands." Well the fact of the matter is that previous buyers bought "agrarian" or "residential" lands which were re-zoned without recourse, so again we suspect the "inability" to protect residential lands south of the 401 reflects "unwillingness,"—not "inability." Is this not something a City Council has the power to do? The Minister of the Environment so stated in the document quoted above.]*
- * **Prevent any area deemed "high saturation"—as ours assuredly is—from construction of *any* additional malodour-generating plants.**
- * **Request an air-quality test be carried out in the Wellington Road/ 401 with the bill going to the emitters: OCL, SF, Ingredion**
- * **Initiate a system for City fines for offenders in addition to**

those that come from charges laid by the MOE. *[And just as an aside, since the municipality does end up with fines such as Orgaworld has already had—the last being a total of \$250,000., a handsome sum over and beyond the company’s taxes for the year—it would be a sad commentary if the City is profiting from the grief citizens in our neighbourhoods suffer, and the action citizens take which enables the MOE to lay the charges thus generating the fines. If the City continues to let this occur, this would be both unconscionable and sinister. How about putting the last \$250,000. fine toward conducting an air quality test just south of the 401 on Wellington?]*

The above are things that should and can be done.

BUT, IN OUR VIEW

***** THE ONLY REAL AND LASTING SOLUTION IS THAT THE CITY WORK WITH THE PLANTS AND THE PROVINCIAL MOE TO RELOCATE THE PLANTS** (and the W12 Compound would make sense as a repository for such facilities.) **In our view, this is the ONLY circumstance under which these offending companies should be allowed to continue to exist, and we would suggest the cost of relocation be borne mainly by the plant and province, with the municipality contributing something owing to its having allowed misplacement of the plants to begin with, company violations notwithstanding. Clearly a few million to effect relocation of these two offenders would be a small price tag in comparison with the 1.1 billion associated with the Ontario gas plant cancellations.**

OR FAILING THAT,

***** ORDER PLANT SHUTDOWN.**

[Because clearly violating our Municipal and Environmental rights, what Orgaworld and Stormfisher are doing is illegal. There is no other word for it, and yet they are permitted to continue operation. Why? Because, once Pandora’s Box is open, it is very difficult to put the escapees back in the box. Suddenly plants with failing performance take on a Frankenstein life of their own, and they have the regulators by the throat. The local MOE’s position at the very lengthy ERT was that “more waste taken in at Orgaworld results in more malodour,” while Orgaworld’s was “more waste results in less odour” (because they would ramp up to full capacity and function perfectly, of course!). When the company’s theory was obviously proven fallacious, one of the directors from Orgaworld at a public meeting post ERT made a statement to this effect: “No! this ERT wasn’t to test that thesis: it was a test of how far we could get with the Government of Ontario.” Neighbourhood representatives who had spent 50 hours at this ERT--so serious and contentious it lasted 8 days--were shocked. The sad reality is that these companies end up playing the City and the government for fools. So the City and province are doing no one—and certainly not themselves--a favour to permit the likes of Orgaworld and Stormfisher to spring into existence without serious provisos and regulations that can be acted on without endless reprisal, endless appeals. Elsewhere—actually in a document we wrote and circulated to the City and Government expressing our environmental concerns as early as 2009

(obviously long before Stormfisher) --we suggested that with regard to new composting companies that the province pass legislation for composting plants mandating a two-year "no rights guaranteed" trial period during which municipalities or the government can revoke certificates of approval of offending plants without legal recourse by the firm. The City should push the Provincial government to do this because municipalities end up living with the fallout! Naturally waste management companies certain of their technologies should not be troubled by this safeguard to protect citizens. Those companies with failing performance beyond a 2-year period deserve to be shut down, and that is the risk they should have to take and a potential consequence they should have to bear. And shutdown where warranted should be done swiftly.]

In conclusion, the key points to be reiterated are:

- * Our communities predate either offending plant by decades and should not be subject to the slow form of torture and denial of legislated municipal rights which we have experienced.

- * The City and Provincial MOE were warned the location would be a poor one for either plant, so having flown in the face of common sense and professional advice, the City, the MOE and sadly the community are now left with an untenable situation.

- * 9+ years of significant numbers of complaints are of enormous consequence, and demonstrate the overwhelming severity of the problem.

- * Even though having a less dense population than other areas of the City, citizens in Shaver and Brockley are honest, hard-working, tax-paying citizens who deserve the same protection that would be accorded any other part of the City.

- * The City of London in concert with the offenders and regulating bodies has the responsibility to address and rectify the crisis, and should not hesitate to do so because the offenders are breaking the law.

So at this moment, we ask our City to restore our violated Municipal and Environmental rights. We believe how a City cares for and protects its disadvantaged is what shows the strength, character and human face of that City. We would ask you to be that Mayor, those Councillors, those City officials who make London a city which demonstrates care and protection for all of its citizens.

* Document initially prepared for presentation to London Mayor and Officials in November of 2016; subsequently edited for the August 28 2017 Public Participation Meeting at City Hall to include updated numbers current to the end of July, 2017 which were received from the local MOE