



October 3 2025

Adam Zufferli
Policy Planner, Community Planning
Planning Services, Community Development
City of Waterloo
Adam.Zufferli@waterloo.ca

Dear Adam,

RE: Addendum to Heritage Impact Assessment, 167-171 King Street East, Waterloo
OUR FILE: 15202 V

The purpose of this Addendum is to provide further information related to the Heritage Impact Assessment (August 2025) prepared in support of the proposed development at 167-171 King Street Water, Waterloo.

City staff has requested further information related to the following:

- Schedule & reporting structure for implementing the recommended mitigation measures; and
- More clarity regarding the recommendation to update the Part IV designation By-law.

MHBC cultural heritage staff met to discuss the above with City staff on September 22 2025. In response to the above-noted points, we are able to provide the following information:

Schedule & Reporting Structure for Mitigation Recommendations

The Heritage Impact Assessment provides the following mitigation recommendations:

- Completion of a Conservation & Interpretation Plan that will provide:
 - Further details regarding any proposed alterations to heritage attributes (i.e. any repairs or replacements in-kind, etc.);
 - Further information and direction on how the building will be repaired in the short-term and prepared for re-location;
 - Further information regarding how the building will be secured, stabilized and maintained during construction activities;

- Details regarding the proposed construction phase and staging activities as it relates to re-location;
- Direction regarding how the building will be appropriately repaired and conserved. This includes guidance on proposed alterations, with reference to the Parks Canada Standards & Guidelines for the Conservation of Historic Places in Canada;
- Recommendations for appropriate conservation practices over the long-term (post construction phase/long-term maintenance) stage of development; and
- A commemoration strategy to interpret and communicate the history of the site. This includes (but is not limited to) an interpretive plaque located adjacent to the building.
- Vibration monitoring:
 - A qualified engineer should be consulted to determine whether or not the proposed development results in potential impacts on adjacent buildings as it relates to vibrations from construction activities and determine whether or not mitigation and vibration monitoring is recommended.

The Conservation & Interpretation Plan will provide detailed information as it relates to schedules and reporting structure to ensure that the building is appropriately conserved. We propose the following related to schedule and reporting structures:

- Monitoring will occur throughout the course of the project, and updates to the City will be provided at the following phases of construction:
 - a) Immediately following the re-location of the heritage building to confirm that it has been re-located safely;
 - b) After the construction phase when all work associated with the heritage building (including the installation of any approved commemoration) have been installed.
- Vibration monitoring will require assessment by a professional prior to substantial construction activities and if required, will remain in-place as needed, throughout the duration of construction activities.

The Conservation Plan will be drafted in the future when more detailed information is available. We propose that the Conservation Plan be submitted as a Condition of Site Plan Approval.

Designation By-law Update

The property located at 167 King Street South was designated under Part IV of the *Ontario Heritage Act* in 1978. At the time the By-law was registered on-title, the 1974 version of the *Ontario Heritage Act* did not require that a by-law include a) the reasons for which the property was identified as being of Cultural Heritage Value or Interest, with reference to applicable criteria under *Ontario Regulation 9/06*, and b) an accurate list of physical heritage attributes which are subject to the By-law.

Given the amendments to the *Ontario Heritage Act* in 2005, we recommend that the existing by-law be updated following all construction activities in order to come into conformity with current legislation. This will enable a clear interpretation of the By-law and the features of the site which are heritage attributes, and those which are not.

Should you require anything further, please do not hesitate to contact me.

Yours truly,

MHBC

A handwritten signature in cursive script, appearing to read 'Vanessa Hicks'.

Vanessa Hicks, MA, CAHP
Associate

cc. Paul Leveck, Urban Legends Developments Ltd.

cc. Andrea Sinclair, MHBC

cc. Dan Currie, MHBC