Notice of Revision of Environmental Study Report

University Avenue (Regional Road 57) Improvements
Albert Street to Weber Street
City of Waterloo
Municipal Class Environmental Assessment

The Regional Municipality of Waterloo has undertaken a planning study to consider improvements to University Avenue from Albert Street to Weber Street in the City of Waterloo. This project was planned in accordance with the Ontario Environmental Assessment Act following the approved process for Schedule 'C' projects under the "Municipal Class Environmental Assessment" (October 2000, as amended to 2023).

The Environmental Study Report (ESR) was completed and made available to both public and environmental agencies review in May 2023. Based on comments received from review agencies, specifically GRCA, MECP, and MCM, the ESR was revised in August 2023.

The Region of Waterloo is seeking comments on the revised ESR. At this stage only comments to the revised content will be reviewed. A response letter to each of the agencies that contains both the comments and the response are attached to this notice identifying the changes made to the ESR.

The revised ESR is available for public, government agency and Indigenous Community review in accordance with the requirements of the Municipal Class Environmental Assessment. Subject to comments received following this Notice, the Region of Waterloo intends to proceed with the construction of this project in 2024/2025.

An electronic version of the revised ESR is available for review on-line at https://www.engagewr.ca/University-Ave.

A printed copy of the revised ESR is available for review during regular business hours at the following locations:

The Regional Municipality of Waterloo
Clerk's Office
150 Frederick Street, 2nd Floor
Kitchener, Ontario

The Corporation of the City of Waterloo
Waterloo City Hall
100 Regina Street South
Waterloo, Ontario

Interested persons should provide written comments to the Region's Clerk's Department within 30 calendar days from the date of this Notice (August 9, 2023).

In addition, a request to the Minister of the Environment, Conservation and Parks for an order imposing additional conditions or requiring an individual environmental assessment may be made on the grounds that the requested order may prevent, mitigate or remedy adverse impacts on constitutionally protected Aboriginal and treaty rights. Requests should include your full name and contact information.

Requests should specify what kind of order is being requested (additional conditions or an individual environmental assessment), explain how an order may prevent, mitigate or remedy potential adverse impacts, and can include any supporting information. The request should be sent in hardcopy or by email to:

Minister of the Environment, Conservation and Parks
Ministry of Environment, Conservation and Parks

777 Bay Street, 5th Floor
Toronto ON M7A 2J3
minister.mecp@ontario.ca

and

Director, Environmental Assessment Branch
Ministry of Environment, Conservation and Parks
135 St. Clair Ave. W, 1st Floor
Toronto ON, M4V 1P5
EABDirector@ontario.ca

Requests should also be sent to the Region of Waterloo by mail or by e-mail. Please visit the ministry's website for more information on requests for orders under section 16 of the Environmental Assessment Act at: https://www.ontario.ca/page/class-environmental-assessments-part-ii-order

Andrew Doman, P.Eng. Project Manager / Senior Engineer
Region of Waterloo
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This Notice issued August 9, 2023.

All personal information included in your request – such as name, address, telephone number and property location – is collected, under the authority of section 30 of the Environmental Assessment Act and is collected and maintained for the purpose of creating a record that is available to the general public. As this information is collected for the purpose of a public record, the protection of personal information provided in the Freedom of Information and Protection of Privacy Act (FIPPA) does not apply (s.37). Personal information you submit will become part of a public record that is available to the general public unless you request that your personal information remain confidential.

This notice is being provided pursuant to the Ontario Environmental Assessment Act, the Municipal Engineers Association's Municipal Class Environment Assessment (2023), and the direction of the Ministry of the Environment, Conservation and Parks.

ARCADIS IBI GROUP
101 – 410 Albert Street
Waterloo ON N2L 3V3 Canada
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August 9, 2023

From:
Mr. Kelly Cobbe, P.Eng.
Director – Infrastructure Lead, Canada East
Arcadis IBI Group
101-410 Albert Street
Waterloo, ON N2L 3V3

On Behalf Of:
Mr. Andrew Doman, P.Eng.
Senior Engineer, Transportation Expansion
Design & Construction Division
Region of Waterloo
150 Frederick Street
Kitchener, ON N2G 4J3

To:
Joan Del Villar Cuicas
Regional Environmental Planner
Project Review Unit, Environmental Assessment Branch
Ontario Ministry of the Environment, Conservation and Parks (MECP)
1st Floor, 135 St. Clair Avenue West
Toronto, ON M4V 1P5

RE: University Avenue (Albert Street to Weber Street North) Reconstruction
Region of Waterloo, Municipal Class Environmental Assessment – Schedule C
Response to Project Review Unit Comments – Environmental Study Report

Dear Joan Del Villar Cuicas:

Thank you for reviewing the Environmental Study Report (Report) for the above noted Class Environmental Assessment (EA) project. The Region of Waterloo (Region) received your letter on June 9, 2023 and has reviewed and addressed all comments.

Included below is a brief response to each of the eighteen (18) comments provided by MECP in the letter dated June 9, 2023. A copy of the MECP letter (dated June 9, 2023) is also attached to this letter for reference.

We are also providing digital copies (PDF) of the updated Environmental Study Report and appendices through the Region of Waterloo FTP Site. Access instructions to the FTP site were provided through the email that contains this letter.

General

Comment 1:

Please note that an executive summary is recommended to be included in the Environmental Study Report, as noted in Section A.4.2.1 of the Municipal Class EA parent document.

Response 1:

An Executive Summary was included on the revised ESR.

Comment 2:

Due to the number of appendices included in the report, it is recommended that page numbers for

the appendices be provided in the table of contents. This would aid in the navigation, especially due to the number of appendices identified with the same letter (for example, there is Appendix A – Organizational Chart of Project Team for the ESR, however, there is also an Appendix A as part of the Cultural Heritage Resource Assessment as well as in other sections).

Response 2:

We have decided to separate the pdf files of the ESR report body from its appendices. The intention is to allow the reader to access both the ESR body and the referenced appendix at the same time. Therefore, facilitating the comprehension of what is being discussed on the ESR.

Comment 3:

It is recommended that the map displayed in exhibit 1-2 referenced in Section 1.5.2 be revised to include the street labels and a compass to facility the review of the section.

Response 3:

Exhibit 1-2 updated.

Comment 4:

Section 3.5 refers to implementing “protected intersection” geometric design features, without elaboration on what those may be. A glossary or explanation of these terms may enhance the public’s understanding.

Response 4:

A brief explanation of a protected intersection design was included on Section 3.5 of the ESR.

Comment 5:

Please note that the responsibility for administration of the Ontario Heritage Act and matters related to cultural heritage have been transferred from the Ministry of Tourism, Culture and Sport (MTCS) to the Ministry of Citizenship and Multiculturalism (MCM). Individual staff roles and contact information remain unchanged.

Response 5:

Noted.

Class EA Process & Master Plan Approach

Comment 6:

MECP recommends two slight revisions of section 1.6.1, firstly, in the discussion of the phased requirements the ESR does not mention the mandatory public consultation in phases 2,3 and 4. Secondly, it should be specified that although the Municipal Class EA process is 5 phases, it is only mandatory to perform all 5 in Schedule C projects, and Schedule B projects are not mandated to undergo phases 3,4 and 5.

Response 6:

New paragraphs and figures were added to ESR section 1.6.1 to address the two issues.

Evaluation of Alternatives

Comment 7:

In the chart displaying the evaluation of design alternatives on page 468, all four design alternatives are given the same evaluation in the transit column, but four different scores of preferences. The preference score should be changed to be identical, or the evaluation should be

different for each alternative with a different score.

Response 7:

Description for each alternative (under traffic section) was updated to reflect preference score.

Comment 8:

In Chapter 3 of the report, there was recommendations made to move or install a new bus bay, as well as reconstructing the intersections. These recommendations were not included in the evaluation of alternatives, and no reasoning was provided for their exclusion.

Response 8:

The evaluation of the alternative usually consider just features that differentiate one from the other, so that a different score can be given. This process allows us to choose the preferred alternative as the highest score amongst all alternatives. Installing bus bays and reconstruction of intersections was common between all alternatives (except “do nothing”), and including them on the evaluation matrix would not aid in choosing the preferred alternative.

Comment 9:

In the discussion of project costs in Exhibit 7-2 of the ESR the cost of watermain, sanitary and storm sewer replacement is included as a part of the total cost. However, in Appendix F the cost estimates are performed without consideration of these costs. If there is a reasoning for including these figures in one estimate but not another, it should be explicitly mentioned for improved clarity.

Response 9:

Under item 1.4 it is mentioned the watermain and sewer systems have reached the end of their life and require replacement. Replacement of said systems will happen in all alternatives (excluding “do nothing”) and therefore should not change the score between alternatives as they would weight equally between preference on alternatives. Further, Section 4. - Costs of the Evaluation Table in Appendix F includes a reference that underground replacements are not included in the cost estimates for alternatives comparison.

Monitoring

Comment 10:

Consideration of the monitoring program to be developed and implemented as part of Phase 5 of the Class EA planning process is missing from the ESR. As per section A.4.2.1 of the Municipal Class EA document, the ministry expects the proponent to include in the ESR a discrete section discussing how the monitoring program will monitor and review the environmental impacts predicted and the commitments made to mitigation throughout the planning and design process.

Response 10:

A brief explanation of the monitoring process was included to section 1.6.1 and a thorough explanation was included as section 10.1.

Notice of Completion

Comment 11:

Please ensure that the Notice of Completion and any follow- up correspondence are included in the final version of the ESR.

Response 11:

Noted. The Notice of study completion and any follow-up correspondences will be included in the final Environmental Study Report.

Comment 12:

The table of contents has Appendix H labelled as the Notice of Study Commencement and Notice of Study Completion, but only a Notice of the Study Commencement is provided.

Response 12:

Appendix H has been renamed to Public Notices to include Notice of Study Commencement, Notice of Study Completion, as well as Notice of Revised Study.

Comment 13:

Section 1.6.2 did not reflect the changes made to the Environmental Assessment Act in July 2020, which scoped the grounds on which a s.16 order request (formerly referred to as a) can be made to the Minister. Section 16(6) of the Environmental Assessment Act provides that a request for an order can be made only on the grounds that the order may prevent, mitigate, or remedy adverse impacts on existing Aboriginal and treaty rights of the Aboriginal peoples of Canada as recognized and affirmed in section 35 of the Constitution Act, 1982. This section should be updated to reflect these changes.

Response 13:

Section 1.6.2 was updated to address EA Act changes.

Air Quality and Odour

Comment 14:

Section 9.4 of the ESR identifies potential dust impacts during construction. Please note that the ministry recommends that non-chloride dust suppressants be applied during construction. For a comprehensive list of fugitive dust prevention and control measures, refer to Cheminfo Services Inc. Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities report prepared for Environment Canada. March 2005.

Response 14:

Noted.

Climate Change

Comment 15:

Climate change considerations have not been documented in the ESR. The document "Considering Climate Change in the Environmental Assessment Process" (Guide) (www.ontario.ca/page/considering-climate-change-environmental-assessment-process) is now a part of the EA program's Guides and Codes of Practice. The Guide sets out the ministry's expectation for considering climate change in the preparation, execution and documentation of environmental assessment studies and processes. The guide provides examples, approaches, resources, and references to assist proponents with consideration of climate change in EA. The proponent should review this Guide in detail. The ministry expects proponents of Class EA projects to:

- Consider the project's expected production of greenhouse gas emissions and impacts on carbon sinks (climate change mitigation), as well as resilience or vulnerability of the undertaking to changing climatic conditions (climate change adaptation).
- Include a discrete section in the ESR detailing how climate change was considered in the EA.

How climate change is considered can be qualitative or quantitative in nature and should be scaled to the project's level of environmental effect. In all instances, both a project's impacts on climate change (mitigation) and impacts of climate change on a project (adaptation) should be considered."

Response 15:

Section 9.6 – Climate Change, has been added to the ESR. Discussion on the project's impacts on climate change (mitigation) as well as impacts of climate change on the project (adaptation) are included in this section.

Groundwater

Comment 16:

Current geotechnical and hydrogeological conditions are adequately described in the geotechnical investigation report.

It is anticipated that the amount of groundwater to be handled in the eastern portion of the project area could exceed 50,000 Litres/day. During the design stage when the depth/elevation of the excavations for the sewers are being finalized, a more detailed hydrogeological assessment by a Qualify Person (QP) is required to determine if the water taking at this site would exceed 400,000 L/day (278 L/min).

However, BH-10 (groundwater level 1.8 mbgs ±318.4 masl – near Regina Street North) has vinyl chloride, cis-1,2-dichloroethylene, and trans-1,2- dichloroethylene concentrations above Table 2 and, tetrachloroethylene, trichloroethylene, cobalt, and copper concentrations above the PQWO standards.

Pumping and treatment of DNAPL require a thorough characterization of the geological and hydrogeological site conditions, including the precise location and extent of the contamination, to identify preferential contaminant migration pathways and potential impacts. To meet the scientific evaluation criteria for permit approval (EASR/PTTW), water quality concerns must be addressed by a QP, the "Water Taking Report" should consider that taking does not cause contaminated groundwater to mix with uncontaminated water (on other water users and the ecosystem) or otherwise worsen the extent of off-site impacts from a contaminant source and that the discharge of pumping effluent does not cause water quality problems in surface water. Also, the contingency plan should include measures to address the potential impact of the proposed water taking on other water users, a description of potential site-specific impacts, and a description of a shutdown protocol if the QP assesses that such a protocol is required.

If construction of this project requires groundwater dewatering exceeds 50,000 L/d and is <400,000 L/d, the prescribed activity will be registered as an Environmental Activity and Sector Registry (EASR) regulation O. Reg. 63/16. If EASR is required, a calculation of the amount of groundwater that is expected to be taken from the area of influence of each dewatering pit, and from any overlapping areas of influence should be provided to evaluate the level of groundwater impacts. As well, as a notification protocol that identifies water users that may be impacted, including a written notice with details of the water taking (time, location, etc.) and a contingency plan with measures to mitigate identified risks.

If groundwater dewatering is more than 400,000 L/d (278 L/min), a Permit to Take Water (PTTW) should be obtained (Sections 34 and 98 Ontario Water Resources Act R.S.O. 1990 and Water Taking Regulation O. Reg. 387/04). If a PTTW is required, a hydrogeological environment assessment should be provided in detail to allow for a reasonable evaluation of the level of groundwater impacts that might occur as a result of the undertaking during Regional Road 57 and underground infrastructure improvements.

If a PTTW is required, an investigation should be conducted during the detailed design stage regarding potential interference due to construction with other water users along this project. The hydrogeologic investigation includes drilling and installation of monitoring wells, stream-bed mini-piezometers, groundwater levels, and water quality monitoring (O. Reg. 169/03: Ontario Water Quality Standards). This investigation should include the related monitoring and mitigation plan

regarding project interference with other water users within the zone of influence of this project. As well, as impact prediction models, mitigation measures, and monitoring and compliance reporting if they are applicable.

If a PTTW is required, an environmental assessment report prepared by a qualified professional (PGO or equivalent) and a geotechnical note prepared by a geotechnical engineer should be included in the supporting documentation of the PTTW application including any risks posed to nearby structures from subsidence, and the potential for contaminated groundwater migration from construction dewatering (O. Reg. 153/04: Records of Site Conditions – Part XV.1 of the Act). The geotechnical note should address potential surrounding structural damage due to settlement from the required groundwater taking and the proposed monitoring/contingency and mitigation plan.

If a PTTW is required, a more detailed surface water impact assessment by a QP is a requirement, including a discussion of the potential impacts on the surrounding natural environment and adjacent waterbody feature(s).

PTTW applications must also provide details regarding the proposed discharge plan and discuss how the dewatering effluent/surface water (i.e., rain) will be managed and treated to meet water quality criteria based on the final discharge location (i.e., storm sewer, sanitary sewer, or natural environment). Appropriate water quality sampling will be required for comparison against the Provincial Water Quality Objectives (PWQO) in preparation for obtaining a water handling permit, which may include suitable sewer-use bylaws.

If construction of this project requires the disposal of solids and sediments, the prescribed activity will be required to provide information on the chemical quality of the subsurface soils and analytical test results (Soil, Ground Water and Sediments Standards for Use Under Part XV.1 of the Environmental Protection Act, effective July 1st, 2011). Disposal material options are applicable under Regulation 153/04 Records of Site Condition - Part XV. I of the Act – Table 1, 2, and 3 of the Soil, Ground Water, and Sediment Standards. O. Reg. 153/04, s. 36 (2); O. Reg. 511/09, s. 16 (1). effective July 1st, 2011.

O. Reg. 406/19: On-Site and Excess Soil Management December 4th, 2019, introduces a new framework for excess soil reuse standards, waste designation, and approvals. Since January 1st, 2023, Excess Soil Planning Requirements (assessment of past use, sampling protocol, destination assessment report, digital tracking, and registration) is required for any soil, or soil mixed with rock, that has been excavated as part of a project and removed from the project area for the project.

Response 16:

Geotechnical report (Appendix B) states that it is anticipated that the amount of groundwater to be handled in the eastern portion of the project area could exceed 50,000 Litres/day. Geotechnical report also acknowledges that pumping over 50,000 Litres/day would be considered to be a “water taking” by the Ministry of Environment, Conservation and Parks (MECP) and is subject to the ministry’s “Permit To Take Water (PTTW)” requirements.

The Geotechnical Report also states that during the design stage when the depth/elevation of the excavations for the sewers are being finalized, a more detailed hydrogeological assessment by a QP is required to determine if the water taking at this site would exceed 400,000 L/day (278 L/min). Thereafter, the need for either EASR registration or a PTTW can be determined.

It is acknowledged that in the circumstance where the required pumping is anticipated to be in excess of 400,000 L/day, an application will be made to the MECP for a Category 3 Permit-To-Take-Water.

Geotechnical report also acknowledges the importance of excess soil management and recommends that Transportation of excess soils from the source site to the receiving site(s) should be carried out in accordance with the MECP document entitled “Management of Excess Soil - A Guide for Best Management Practices” dated January 2014.

Reference to O. Reg. 406/19 has been added to the ESR in Section 3.3.3, including discussion on additional reporting and/or sampling that may be required during detailed design to satisfy the new soil use planning requirements.

Further investigation on dewatering needs as well as excess soil management will be developed during detailed design.

Species at Risk

Comment 17:

Species at Risk Branch recommends that the potential roost trees for bats be removed outside the active season (i.e., avoid April 1 – September 30), if these trees cannot be retained.

Response 17:

Note included on the ESR under section 2.4.3.1

Comment 18:

It is the responsibility of the proponent to ensure that Species at Risk are not killed, harmed, or harassed, and that their habitat is not damaged or destroyed through the proposed activities to be carried out on the site. If the proposed activities cannot avoid impacting protected species and their habitats, then the proponent will need to apply for an authorization under the Endangered Species Act (ESA). If the proponent believes that their proposed activities are going to have an impact or are uncertain about the impacts, they should contact SAROntario@ontario.ca to undergo a formal review under the ESA.

Response 18:

This is acknowledged. The ESR notes direct and indirect impacts that have potential to occur as a result of the road improvements under Exhibit 9-1.

Yours truly,

ARCADIS IBI GROUP



Kelly Cobbe, P.Eng.
Senior Project Manager
Director – Infrastructure Lead, Canada East

Attachments

1 – MECP Project Review Unit Comments Letter (Dated June 9, 2023)

2 – Updated Environmental Study Report and Appendices, Dated August 9, 2023 (Provided through FTP site)

cc: Andrew Doman, Region of Waterloo
Dan Zoia, Arcadis IBI Group

ARCADIS IBI GROUP
101 – 410 Albert Street
Waterloo ON N2L 3V3 Canada
tel 519 585 2255
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August 9, 2023

From:
Mr. Kelly Cobbe, P.Eng.
Director – Infrastructure Lead, Canada East
Arcadis IBI Group
101-410 Albert Street
Waterloo, ON N2L 3V3

On Behalf Of:
Mr. Andrew Doman, P.Eng.
Senior Engineer, Transportation Expansion
Design & Construction Division
Region of Waterloo
150 Frederick Street
Kitchener, ON N2G 4J3

To:
Joseph Harvey
Heritage Planner
Heritage Planning Unit
Ministry of Citizenship and Multiculturalism
56 Wellesley Street West, 14th Floor
Toronto, Ontario M7A 2E7

RE: Municipal Class EA – Schedule C – Notice of Completion
University Avenue (Regional Road 57) Improvements Albert Street to Weber Street
MCM File : 0010790

Dear Mr. Harvey:

Thank you for reviewing the Environmental Study Report (Report) for the above noted Class Environmental Assessment (EA) project. The Region of Waterloo (Region) received your letter on June 5, 2023 and has reviewed and addressed your comments.

Included below is a brief response to each of the four (4) comments provided by MCM in the letter dated June 5, 2023. A copy of the MCM letter (dated June 5th, 2023) is also attached to this letter for reference.

We are also providing digital copies (PDF) of the updated Environmental Study Report and appendices through the Region of Waterloo FTP Site. Access instructions to the FTP site were provided through the email that contains this letter.

Comment 1 – Section 2.6 (Cultural Heritage), pages 13-14:

We recommend including the following revisions to align with current legislation and terminology:

2.6 Cultural Heritage **Environment**

Section 2.6 describes the existing conditions of the cultural heritage component of the environment. Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes.

2.6.1 Archaeology~~ical~~ **Resources**

A Stage 1 archaeological assessment (AA) (under Project Information Form number (PIF) P094-0305-2019) was undertaken on December 12, 2022, by Archaeological Research Associates Ltd. for the study area. A Stage 1 AA consists of a review of geographic, land use and historical information for the property and the relevant surrounding area, and contacting MCM to find out whether, or not, there are any known archaeological sites on or near the property. Its purpose is to identify areas of archaeological potential and further archaeological assessment (e.g., Stage 2-4) as necessary. The Stage 1 AA report is included in Appendix D.

[Then include the outcomes and recommendations of the report, as is in the Executive Summary – just copy and paste]

2.6.2. Built Heritage **Resources** and Cultural Heritage Landscapes

A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment [date & consultant] was undertaken to assess the preferred alternatives for known (previously recognized) or potential built heritage resources and cultural heritage landscapes (BHR/CHLs). Based on the report, it was determined that there is # known and potential BHR/CHL within the study areas. No direct impacts to known or potential BHR/CHL are anticipated so no further technical cultural heritage studies have been recommended.

The Cultural Heritage Report is included in Appendix X.

If direct impacts to BHR/CHL are anticipated, then replace the final sentence of the paragraph above and insert the following text reflecting the updated CHRA:

The preferred alternatives may impact potential BHR/CHL. Cultural Heritage Evaluation Reports were recommended for the # properties that could be directly impacted. All CHERs were undertaken on [date] by [heritage consultant].

Response 1:

We have revised the ESR to reflect MCM recommendations.

Comment 2 – Section 5.2 (Evaluation Criteria for Design Alternatives), page 20:

We recommend the following revisions to align with our suggested revisions to section 2.6.

… The evaluation criteria used is shown below:

- …
- …
- Socio-Cultural Environment: What impacts does the alternative have on existing established communities and businesses, property noise/vibration, known (previously recognized) and potential **cultural heritage resources** ~~potential archaeological resources, built heritage features~~ and visual character?

Response 2:

We have amended the ESR to reflect MCM recommendations for Section 5.2. Evaluation Criteria for Design Alternatives.

Comment 3 – Section 9.0 (Environmental Impacts, Mitigation and Commitments) page 30:

We recommend revising this section so that it includes the following additional mitigations

9.2.1 Archaeology

~~A Stage 1 Archaeological Background Study was completed for the study area, which found that two (2) previously registered archaeological sites are located within one (1) km of the study area. Property inspection determined that the study area does not exhibit archaeological potential.~~ A Stage 1 archaeological assessment (AA) (under Project Information Form number (PIF) P094-0305-2019) was undertaken on December 12, 2022, by Archaeological Research Associates Ltd. for the study area. The Stage 1 AA report is included in Appendix D.

[Then include the outcomes and recommendations of the report, as is in the Executive Summary – just copy and paste]

Should the proposed work extend beyond the study area, further Stage 1 archaeological assessment should be conducted to determine the archaeological potential of the surrounding lands.

Should previously undocumented archaeological resources be discovered, they may indicate a new archaeological site and therefore subject to Section 48 (1) of the Ontario Heritage Act. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out archaeological assessment, in compliance with Section 48 (1) of the Ontario Heritage Act.

The Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33 requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11, the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism (MCM) should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act.

9.2.2 Built Heritage and Cultural Heritage Landscapes

[Insert recommendations of the updated CHRA] ~~Construction activities and staging should be suitably planned and undertaken to avoid impact to the cultural heritage resources. Should future work require an expansion of the study area then a qualified heritage consultant should be contacted to confirm the impacts of the proposed work on potential heritage resources.~~

Response 3:

We have revised the ESR to reflect MCM recommendations for Sections 9.2.1 and 9.2.2.

Comment 4 - Appendix F – Evaluation Table:

We recommend the following revision to the row addressing the cultural heritage environment:

Legend

- Social Environment
    - ~~Heritage and Archaeological Impacts~~ **Cultural Heritage** [break this point into the following two subcategories]
        - What impact does the alternative have on ~~the following:~~ **known and potential** Built Heritage Resources and ~~Features,~~ Cultural Heritage

Landscapes

- What impact does the alternative have on ~~and~~ Archaeological **Resources and Areas of Archaeological potential** ~~Impacts~~?

The evaluation of alternatives should also be updated to incorporate the findings of the updated CHRA.

Response 4:

We have amended Appendix F of ESR to reflect MCM recommendations.

Yours truly,

ARCADIS IBI GROUP



Kelly Cobbe, P.Eng.
Senior Project Manager
Director – Infrastructure Lead, Canada East

Attachments

1 – MCM Project Review Unit Comments Letter (Dated June 5, 2023)

cc: Andrew Doman, Region of Waterloo
Karla Barboza, Ministry of Citizenship and Multiculturalism
Joan Del Villar Cuicas, Ministry of the Environment, Conservation and Parks
Dan Zoia, Arcadis IBI Group

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June 21, 2023

From:
Mr. Kelly Cobbe, P.Eng.
Director – Infrastructure Lead, Canada East
Arcadis IBI Group
101-410 Albert Street
Waterloo, ON, N2L 3V3

On Behalf Of:
Mr. Andrew Doman, P.Eng.
Senior Engineer, Transportation Expansion
Design & Construction Division
Region of Waterloo
150 Frederick Street
Kitchener, ON, N2G 4J3

To:
Trevor Heywood
Resource Planner
Grand River Conservation Authority
400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Re: University Avenue Improvements Environmental Assessment
University Avenue (Weber Street to Albert Street), Waterloo

Dear Trevor Heywood:

Thank you for reviewing the Environmental Study Report (Report) for the above noted Class Environmental Assessment (EA) project. The Region of Waterloo (Region) received your letter on June 2nd, 2023 and has reviewed and addressed your comment.

Arcadis IBI Group had the opportunity to discuss the issues related to the floodplain with you, Trevor Heywood from the GRCA, on June 13, 2023.

GRCA provided their comments related to the floodplain in an advisory capacity, suggesting that the City of Waterloo be consulted during the road design to determine if mitigation could be provided for the floodplain encroachment at the east limit of University Avenue. Arcadis IBI Group will work with the Region of Waterloo and the City of Waterloo to assess if mitigation measures, such as raising road grades, could be incorporated into the road design.

A copy of the GRCA letter (dated June 2nd, 2023) is also attached to this letter for reference.

Yours truly,



Kelly Cobbe, P.Eng.
Senior Project Manager
Director – Infrastructure Lead, Canada East

– June 21, 2023

Attachments

1 – GRCA Project Review Unit Comments Letter (Dated June 2nd, 2023)

cc: Andrew Doman, Region of Waterloo
Robyn McMullen, City of Waterloo
Dan Zoia, Arcadis IBI Group

Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

June 2, 2023

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kcobbe@ibigroup.com

Re: University Avenue Improvements Class Environmental Assessment
University Avenue (Weber Street to Albert Street), Waterloo

Dear Mr. Doman and Ms. Cobbe,

The Grand River Conservation Authority (GRCA) is in receipt of the Notice of Completion and Environmental Study Report for the above-noted Class Environmental Assessment (Class EA).

The east end of the project area contains the Laurel Creek floodplain, but is outside of the floodway portion of the floodplain. As such, we do not anticipate any negative impacts to the flood hazard upstream or downstream of the project area due to grade changes, and we have no concerns.

A GRCA permit will be required prior to construction.

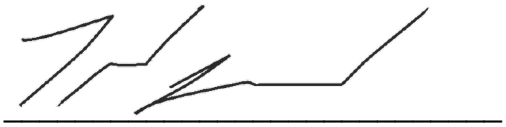
Advisory Comment

Portions of University Avenue and Weber Street east and south of their intersection are affected by floodplain depths and velocities that exceed GRCA's residential safe access criteria. This prohibits residential or overnight accommodation (e.g. hotel / motel) uses on properties along these roads. As such, the City may wish to discuss the feasibility of

floodplain depth improvements within and outside of the Class EA study area with the Region during detailed design.

We trust this information is of assistance. If you have any questions or require additional information, please contact me at 519-621-2763 ext. 2292 or theywood@grandriver.ca.

Sincerely,



Trevor Heywood
Resource Planner
Grand River Conservation Authority

c.c. Robyn McMullen, City of Waterloo