



London
CANADA

The City of London
Arva Pumping Station to Huron Street Transmission Main
Municipal Class Environmental Assessment Master Plan

NOTICE OF STUDY COMPLETION

July 20th, 2021

PUBLIC NOTICE

The City of London (City) has completed a Municipal Class Environmental Assessment (MCEA) master plan study, following Master Plan Approach #2 which fulfills Schedule B requirements and completes Phases 1 and 2 of the MCEA process, to develop short and long-term maintenance and improvement/expansion plans for the Arva Huron Water Transmission main between the Arva Pumping Station and Huron Street. This study included an assessment of the need to maintain and/or potentially widen the existing transmission main easement to continue ongoing monitoring of the condition of the watermain and/or for potential maintenance, repair or replacement of the existing watermain. Long term considerations included evaluating alternative options for routing the watermain between the Arva Pumping Station and Huron Street in total or for specific sections for improvement or expansion purposes.

The study determined that the short-term maintenance alternative is to maintain the easement as is (15m or 50') and only expand where opportunities may arise through land use changes. This ensures access to the existing transmission main for ongoing monitoring, maintenance and/or repair purposes without requiring the purchase of additional easement or property.

The study also determined that the preferred long-term expansion alternative is to twin the transmission main along Adelaide Street to add system capacity and redundancy with a connection to the existing transmission mains at Fanshawe Park Road and on Regent Street (Refer to Figure on back). This will also provide the opportunity for eventual decommissioning of the existing water transmission main between Fanshawe Park Road and Huron Street in the future.

A Master Plan Project File has been prepared and a copy will be placed on public record on July 12th, 2021 for forty five (45) calendar days to be reviewed by members of the public and/or any other interested party at the following locations:

<p>City of London City Hall 300 Dufferin Avenue, London City Clerk 3rd Floor</p>	<p>London Public Library Central Branch – 251 Dundas Street <i>Should the Library be closed due to Covid-19 and public health recommendations, the Master Plan will also be available on the City of London Website.</i></p>
<p>City of London Website https://london.ca/projects/arva-pumping-station-huron-street-water-transmission-main-master-plan</p>	

If there are any outstanding issues or concerns with this project during the 45-day review period, please address them to the City staff listed below and we will attempt to seek a mutually acceptable resolution. If these concerns cannot be resolved in discussion with the City, the Ministry of Environment, Conservation and Parks (MECP) will have an additional 30-day window to decide what action should be taken in response to the concern raised (i.e. disregard, elevate project or approve with conditions).

If no issues or concerns are raised by August 27th, 2021, the project will be considered to have met the requirements of the Municipal Class Environmental Assessment and may proceed with detailed design, tendering and construction of recommended works outlined in the Master Plan File Report.

In the event there are outstanding concerns following discussions with the City regarding potential adverse impacts to constitutionally protected Aboriginal and treaty rights, Part II Order requests on those matters should be addressed in writing to:

Minister Jeff Yurek

Ministry of Environment, Conservation and Parks

777 Bay Street, 5th Floor

Toronto ON M7A 2J3

minister.mecp@ontario.ca

Director, Environmental Assessment Branch

Ministry of Environment, Conservation and Parks

135 St. Clair Ave. W, 1st Floor

Toronto ON, M4V 1P5

EABDirector@ontario.ca

To provide comments, please visit www.london.ca or contact either of the following team members no later than August 27th 2021:

Stephen Romano, P.Eng

Project Manager

Corporation of the City of London

300 Dufferin Avenue

London ON, N6A 4L9

Tel: 519-661-2489 x5537

Email: sromano@london.ca

John Haasen, PMP, CET

Project Director,

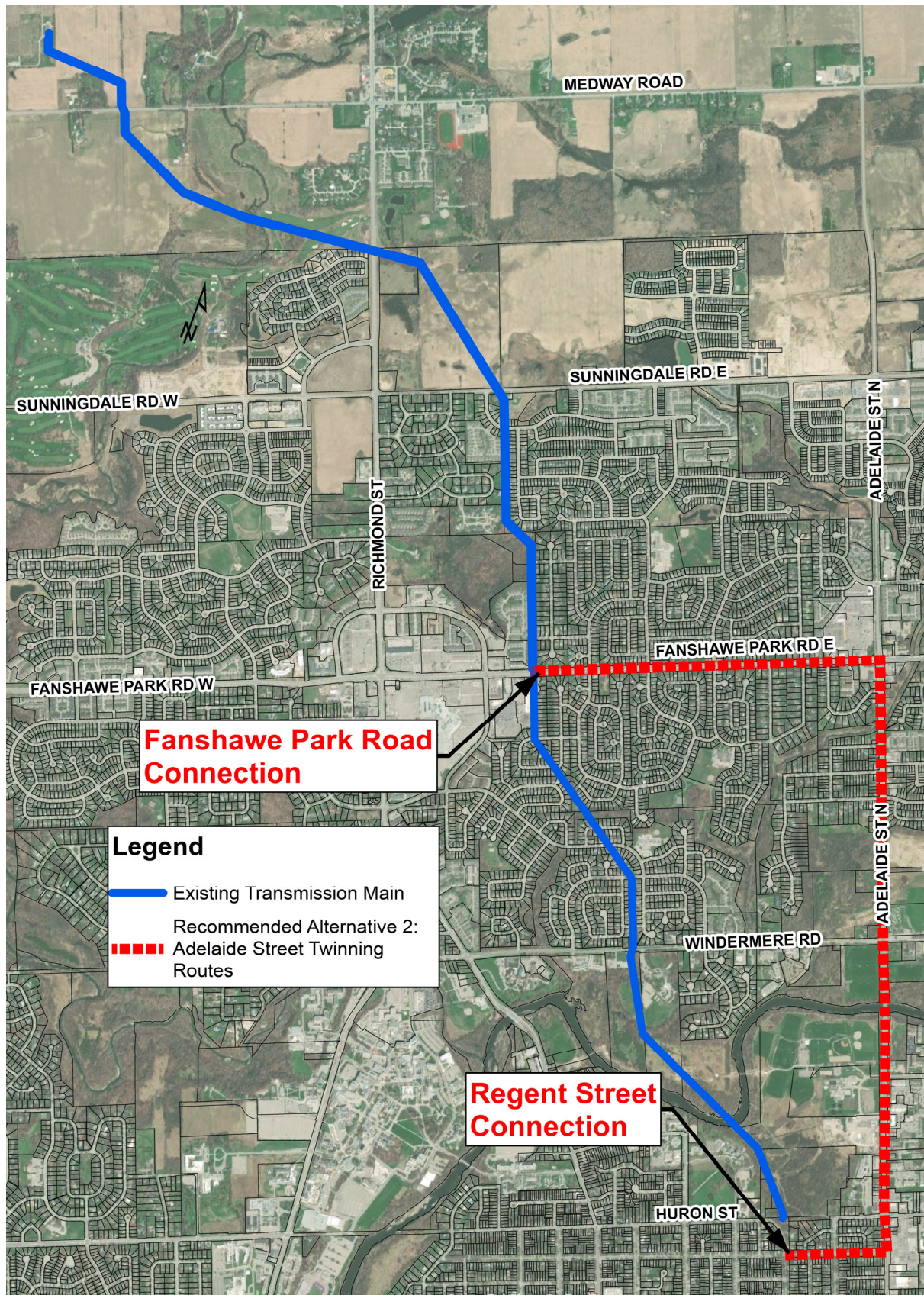
AECOM Canada Ltd.

250 York Street, Suite 410

London ON, N6A 6K2

Tel: 519-963-5889

Email: john.haasen@aecom.com



Information collected for the study will be used in accordance with the Municipal Freedom of Information and Protection of Privacy Act. Except for personal information, including your name, address and property location, all comments received throughout the study will become part of the public record and included in project documentation. Questions about this collection should be referred to the City Clerk at 519-661-2489 ext. 4937.

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

**Ministère de l'Environnement,
de la Protection de la nature
et des Parcs**

Environmental Assessment
Branch

Direction des évaluations
environnementales

1st Floor
135 St. Clair Avenue W
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax.: 416 314-8452

Rez-de-chaussée
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél. : 416 314-8001
Télééc. : 416 314-8452

August 26, 2021

Stephen Romano
Project Manager
City of London

**Re: Arva Pumping Station to Huron Street Transmission Main
City of London
Municipal Class Environmental Assessment – Master Plan (Approach #2)
Project Review Unit Comments – Final Report**

Dear Stephen Romano,

This letter is in response to the Notice of Completion provided for the above noted Class Environmental Assessment (EA) Master Plan report (Report). Our understanding is that in order to develop short- and long-term maintenance and improvement/expansion plans for the water transmission main between the Arva Pumping Station and Huron Street, the preferred short-term alternative is to maintain the easement as-is and expand where opportunities may arise through land use changes, and the preferred long-term alternative is to twin the transmission main along Adelaide Street with connections to existing mains at Fanshawe Park Road and Regent Street in order to add system capacity and redundancy. The Ministry of the Environment, Conservation and Parks (ministry) provides the following comments for your consideration.

General

- 1) The words “*Draft Report*” in the top-right header throughout the Report should be revised, such as with the words “*Final Report*” or “*Project File Report*”.

Section 5.2.1 Aquatic Environment

- 2) Section 5.2.1 of the Report states, “*These watercourses and corresponding crossing identifiers (refer to Appendix B.4 Natural Heritage Existing Conditions Report Figures 2-01 and 2-02)*”

include...” However, the figures provided in Appendix B.4 use the naming conventions Figure 1, 2a-c, and 3a-3c, and these figures do not provide crossing identifiers for the watercourses listed in Section 5.2.1. The Report/Appendix B.4 should be revised to ensure internal consistency and to provide the referenced information if available.

Evaluation of Long-Term Alternatives

- 3) In order improve traceability of the decision-making process, Section 7.4 of the Report should be revised to include a brief summary of why Long-Term Alternative 2 was determined to be preferred over Long-Term Alternative 3A, considering that both alternatives were rated with identical qualitative overall scores of Moderate Impact in Table 7-2 and Table 7-3.

Indigenous Consultation

- 4) Section 3.3 of the Report should include a summary of questions, comments and concerns raised by communities, and how they have been or will be addressed. It is noted that the Chippewas of the Thames First Nation expressed minimal concern with the project but requested to be involved in archaeological studies. It is not clear if/how this request was/will be addressed. The September 23 response from the community does not appear in Appendix A.4, but some correspondence from the proponent appears to be related. Please make sure that all records are included in the record of consultation, and that it is organized to be readily navigated by the reader (e.g. by community). Please make sure to include any follow-up emails or phone calls with communities in the record of consultation and be prepared to provide the record of consultation to Ontario on request.
- 5) Further to any follow-up during the review period for the EA, the proponent should continue reaching out to all communities previously engaged if there any substantial changes to the project/process or if they are applying for subsequent permits from the ministry that may be of interest or concern to communities. The ministry recommends that the proponent include the record of consultation with any subsequent applications to the ministry to help in our review of those applications.

Public Consultation

- 6) Section 3.1 of the Report discusses the comments, questions and concerns raised during the public consultation process. The Report should include a summary of how these public concerns have been addressed through the planning process in order to best meet the requirements of the Municipal Class EA document, particularly Section A.4.1 (available online at <https://municipalclassea.ca/manual/page30.html>), which requires that the project file for Schedule B projects explain, “...*the public consultation program employed and how concerns raised have been addressed.*”

Air Quality

- 7) Further to the discussion of Sediment, Erosion and Dust in Section 9.3, Table 9-1 of the Report, please note that the ministry recommends that non-chloride dust suppressants be applied during construction.

Excess Materials and Waste

- 8) In December 2019, the ministry released a new regulation under the Environmental Protection Act, titled *On-Site and Excess Soil Management* (O. Reg. 406/19) to support improved management of excess construction soil. The regulation is being phased in over time, with the first phase in effect on January 1, 2021. For more information, please visit www.ontario.ca/page/handling-excess-soil. The Report should indicate that construction activities involving the management of excess soil should be completed in accordance with O. Reg. 406/19 and the ministry's current guidance document titled "[Management of Excess Soil – A Guide for Best Management Practices](#)" (2014).
- 9) All waste generated during construction must be disposed of in accordance with ministry requirements.

Noise and Vibration

- 10) Noise control measures should be addressed in construction mitigation plans in order to mitigate adverse noise impacts to nearby residential land uses within the study area during construction activities.

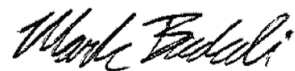
Surface Water

- 11) Further to the discussion of Sediment, Erosion and Dust in Section 9.3, Table 9-1 of the Report, an erosion and sediment control plan will need to be developed for any water crossing that is part of the undertaking. Installing sediment and erosion control measures during the construction is critical both in terms of protecting the water quality and reducing the impacts to local aquatic community. Please submit this plan to the ministry for review once finalized.

Thank you for circulating this Report for the ministry's consideration. Please document the receipt of this Project Review Unit Comments letter in the project file. We look forward to receiving a written response from the City of London to address our comments provided above.

Should you or any members of your project team have any questions regarding the material above, please contact me at mark.badali1@ontario.ca.

Sincerely,



Mark Badali, Regional Environmental Planner, Project Review Unit, MECP

cc Rob Wrigley, Manager, London District Office, MECP
Mark Smith, Water Compliance Supervisor, London District Office, MECP
John Haasen, Project Director, AECOM Canada Ltd.
Paul Adams, Environmental Planner, AECOM Canada Ltd.



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London, ON N6A 6K2
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September 17, 2021

Ministry of the Environment,
Conservation and Parks

Mark Badali
Region Environmental Planner

1st Floor
135 St. Clair Avenue W
Toronto ON M4V 1p5

Arva Pumping Station to Huron Street Transmission Main MCEA - Master Plan Approach #2

Dear Mark Badali,

This letter is in response to the MECP Project Review Unit Comments dated on August 26th, 2021. We have considered your comments and addressed them in the Final Report. Below is an outline of the changes made to the report to address your comments.

1. ***The words “Draft Report” in the top-right header throughout the Report should be revised, such as with the words “Final Report” or “Project File Report”.***

The words 'draft report' in the top right header has been changed to 'Project File Report'.

2. **Section 5.1.2 of Section 5.2.1 of the Report states, “These watercourses and corresponding crossing identifiers (refer to Appendix B.4 Natural Heritage Existing Conditions Report Figures 2-01 and 2-02) include...” However, the figures provided in Appendix B.4 use the naming conventions Figure 1, 2a-c, and 3a-3c, and these figures do not provide crossing identifiers for the watercourses listed in Section 5.2.1. The Report/Appendix B.4 should be revised to ensure internal consistency and to provide the referenced information if available.**

The Figure References in the Project File Report have been updated and match the Figures in the Natural Heritage Existing Conditions report.

3. **In order improve traceability of the decision-making process, Section 7.4 of the Report should be revised to include a brief summary of why Long-Term Alternative 2 was determined to be preferred over Long-Term Alternative 3A, considering that both alternatives were rated with identical qualitative overall scores of Moderate Impact in Table 7-2 and Table 7-3.**

The Following text was added to Section 7.4:

- Although **Alternative 3A: Twin the Transmission Main Along Richmond Street directly to Windermere Rd** had the same overall score as **Alternative 2**, it only represented the northern portions of the route comparisons. When the southern portion alternatives were considered under **Alternative 3B**, they scored less favourably vs. Alternative 2, hence it was chosen as the preferred alternative overall.

4. **Section 3.3 of the Report should include a summary of questions, comments and concerns raised by communities, and how they have been or will be addressed. It is noted that the Chippewas of the Thames First Nation expressed minimal concern with the project but requested to be involved in archaeological studies. It is not clear if/how this request was/will be addressed. The September 23 response from the community does not appear in Appendix A.4, but some correspondence from the proponent appears to be related. Please make sure that all records are included in the record of consultation, and that it is organized to be readily navigated by the reader (e.g. by community). Please make sure to include any follow-up emails or phone calls with communities in the record of consultation and be prepared to provide the record of consultation to Ontario on request.**

The following text was added to the end of this section to direct the reader to the commitment for further Indigenous Community consultation during detailed design:

(See **Section 9.1** for commitments to engage Chippewas of the Thames First Nation during any Stage 2 – 4 Archaeological Assessments).

Section 9.1

Archaeology - Chippewas of the Thames First Nation and Oneida Nation of the Thames will be invited on any future Stage 2, 3 or 4 Archaeological Assessment activities undertaken during detailed design.

5. **Further to any follow-up during the review period for the EA, the proponent should continue reaching out to all communities previously engaged if there any substantial changes to the project/process or if they are applying for subsequent permits from the ministry that may be of interest or concern to communities. The ministry recommends that the proponent include the record of consultation with any subsequent applications to the ministry to help in our review of those applications.**

The City of London is committed to ongoing and meaningful consultation with all Indigenous Communities with an interest in this project going forward and will include the record of consultation to the MECP with any subsequent applications.

6. **Section 3.1 of the Report discusses the comments, questions and concerns raised during the public consultation process. The Report should include a summary of how these public concerns have been addressed through the planning process in order to best meet the requirements of the Municipal Class EA document, particularly Section A.4.1 (available online at <https://municipalclasssea.ca/manual/page30.html>), which requires that the project file for Schedule B projects explain, "...the public consultation program employed and how concerns raised have been addressed."**

Tables 3.2 and 3.3 were added to the report to identify the issues and concerns raised and the AECOM/City Response:

Table 3-2: Townhall Residents Concerns and Issues

Key Issues / Concerns Raised	AECOM / City Response
<ul style="list-style-type: none"> - What would be considered an obstacle for access to the water transmission main within the easement? 	<ul style="list-style-type: none"> - Any object within the easement that would impede access to the water transmission main or valve chambers for maintenance or repair. Examples would include permanent structures such as decks, sheds, playsets, large trees, and concrete pads.
<ul style="list-style-type: none"> - Who would be responsible for removing obstacles within the easement/? 	<ul style="list-style-type: none"> - The property owner would be responsible to remove obstacles from the easement as per their easement agreement.
<ul style="list-style-type: none"> - What is the possibility of a water transmission main break? 	<ul style="list-style-type: none"> - The City proactively monitors all of its transmission mains to ensure the safety of the water supply and City

Key Issues / Concerns Raised	AECOM / City Response
	residents. The chance of a water transmission main break is very low.
<ul style="list-style-type: none"> - What is the current state of the transmission main? 	<ul style="list-style-type: none"> - The current state of the transmission main, based on the Pure Technologies Ltd. assessment ranges from Good (40-60 years of useful life) to Very Good (60+ years of useful life) from Windemere Road North to the Arva Pump Station and Adequate (20-40 years of useful life) from Windemere Road South to the Thames River.

Table 3-3: Publics Concerns and Issues

Key Issues / Concerns Raised	AECOM / City Response
<ul style="list-style-type: none"> - What would be considered an obstacle for access to the water transmission main within the easement? 	<ul style="list-style-type: none"> - Any object within the easement that would impede access to the water transmission main or valve chambers for maintenance or repair. Examples would include permanent structures such as decks, sheds, playsets, large trees, and concrete pads.
<ul style="list-style-type: none"> - Who would be responsible for removing obstacles within the easement/? 	<ul style="list-style-type: none"> - The property owner would be responsible to remove obstacles from the easement as per their easement agreement.
<ul style="list-style-type: none"> - Who would be responsible for installing gates or repairing fences should the City need access? 	<ul style="list-style-type: none"> - The City would install gates and restore any damage to property that is not considered an easement obstacle to the same or better condition.
<ul style="list-style-type: none"> - When the long-term solution is constructed will the existing transmission main on private property be abandoned? 	<ul style="list-style-type: none"> - The installation of the long-term solution would provide the opportunity to decommission and abandon the existing watermain once it has reached its useful service life.

7. Further to the discussion of Sediment, Erosion and Dust in Section 9.3, Table 9-1 of the Report, please note that the ministry recommends that non-chloride dust suppressants be applied during construction.

Table 9.1 - Sediment, Erosion and Dust section has been updated to include:

Sediment, Erosion and Dust	<ul style="list-style-type: none"> - Develop an Erosion and Sediment Control Plan during detailed design that would include the installation of sediment and erosion control measures such as silt fencing and hay-bale check dams prior to construction activities. Once finalized the Erosion and Sediment Control Plan must be submitted to MECP for review. - A dust suppressant (non-chloride) can be applied to areas of exposed soils to reduce or eliminate dust generation during construction. - Water adjacent vegetation when dust accumulation occurs.
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8. In December 2019, the ministry released a new regulation under the Environmental Protection Act, titled On-Site and Excess Soil Management (O. Reg. 406/19) to support improved management of excess construction soil. The regulation is being phased in over time, with the first phase in effect on January 1, 2021. For more information, please visit www.ontario.ca/page/handling-excess-soil. The Report should indicate that construction activities involving the management of excess soil should be completed in

accordance with O. Reg. 406/19 and the ministry’s current guidance document titled “Management of Excess Soil – A Guide for Best Management Practices” (2014).

Table 9-1 has a new row inserted:

Excess Materials and Waste	<ul style="list-style-type: none"> – Construction activities involving the management of excess soil should be completed in accordance with O.Reg 406/19 and the MECP guidance document “Management of Excess Soil – A Guide for Best Management Practices (2014) – All construction waste must be disposed of in accordance with MECP requirements
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9. All waste generated during construction must be disposed of in accordance with ministry requirements.

See second bullet from the above table (All construction waste must be disposed of in accordance with MECP requirements).

10. Noise control measures should be addressed in construction mitigation plans in order to mitigate adverse noise impacts to nearby residential land uses within the study area during construction activities.

Table 9-1 has a new row inserted:

Noise and Vibration	<p>Construction operations to occur during day shift.</p> <p>Adhere to municipal noise by-laws, where possible.</p> <p>Use of low noise equipment during construction, where possible.</p> <p>Implement a vibration, noise and dust monitoring and response program along with limits.</p>
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11. Further to the discussion of Sediment, Erosion and Dust in Section 9.3, Table 9-1 of the Report, an erosion and sediment control plan will need to be developed for any water crossing that is part of the undertaking. Installing sediment and erosion control measures during the construction is critical both in terms of protecting the water quality and reducing the impacts to local aquatic community. Please submit this plan to the ministry for review once finalized.

See Comment response 7 for updated table content.

Thank you for providing these comments to us. We have documented the receipt of these comments, including this response letter in the consultation section of the Project File Appendix.

Kind regards,



Paul Adams
 Environmental Planner
 AECOM Canada Ltd.
 E: paul.adams2@aecom.com

cc: Stephen Romano
 John Haasen