

Appendix A.2

Consultation Materials - After Publishing ESR

The content contained in this Appendix has been collected from various programs and sources. It has not been made accessible as the required effort is cost prohibitive.

**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
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Via E-mail Only

July 21, 2022

Chris Traini
County Engineer
County of Middlesex
ctraini@middlesex.ca

**Re: Blacks Bridge
County of Middlesex
Municipal Class Environmental Assessment – Schedule C
Project Review Unit Comments – Environmental Study Report**

Dear Chris Traini,

This letter is in response to the Notice of Completion provided for the Environmental Study Report (Report/ESR) for the above noted Class Environmental Assessment (EA) project. Our understanding is that in order to address structural deficiencies of Blacks Bridge, Middlesex County (the proponent) has determined that the preferred alternative is replacement with a new 44 metre single span bridge on the same alignment as the existing bridge. The Ministry of the Environment, Conservation and Parks (ministry) provides the following comments for your consideration.

Planning and Policy

- 1) Although section 5.2 of Appendix D of the ESR discusses the Provincial Policy Statement (PPS), 2020 as it relates to cultural heritage resources, a broader discussion of the provincial planning and policy context, including the PPS, is missing from the main body of the ESR. The PPS is a key consideration for identifying land-use planning objectives and evaluating alternative solutions in Phases 2 and 3 of the Class EA process, as noted in Section C.1.1 of the Municipal Class EA parent document (<https://municipalclassea.ca/manual/page45.html>).

The ministry notes that the Middlesex County Official Plan and Municipality of North Middlesex Official Plan, discussed in section 4.4.1 of the ESR, are expected to be kept up-to-date with the PPS in order to protect provincial interests, as per section 4.6 of the PPS, 2020 (www.ontario.ca/page/provincial-policy-statement-2020). Regardless, the ministry notes that policies of the PPS continue to apply even after adoption and approval of an official plan. The ministry recommends including a discussion of the PPS in the main body of the ESR.

Indigenous Consultation

- 2) Please continue reaching out to communities if there are any substantial changes to the project/process or if the proponent is applying for subsequent permits from the ministry that may be of interest or concern to communities. We recommend 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

- 3) Section 3.2 of the ESR states regarding the Notice of Study Commencement, *“The Notice was published in the London Free Press”* and one newspaper excerpt dated August 20, 2020 is included in Appendix A of the ESR. In order to meet mandatory minimum requirements for public consultation for Schedule B projects, as described in Section A.3.5 of the Municipal Class EA parent document (available at <https://municipalclassea.ca/manual/page25.html>), please note for future Municipal Class EA projects that two (2) notices should be published in separate issues of the same newspaper for the first mandatory point of public contact.
- 4) For Schedule C projects, the Municipal Class EA requires two (2) published Notices of Completion of the Environmental Study Report to fulfill the third mandatory point of public contact, as described in Section A.3.5 of the Municipal Class EA parent document. To ensure clear documentation, the ministry recommends that a paragraph be added to section 3.0 of the ESR explaining where, when, and how many times the final Notice of Completion was published in a local newspaper (or equivalent) to fulfil these requirements.

Monitoring

- 5) The ministry recommends that a discrete section be added to the ESR that discusses development and implementation of a monitoring program, as described in section A.4.2.1 of the Municipal Class EA parent document (available online at <https://municipalclassea.ca/manual/page31.html>). Where possible, the program should monitor and review the environmental impacts predicted and the commitments made to mitigation throughout the planning and design process, and describe how unexpected environmental effects identified during the monitoring program will be addressed.

Noise and Vibration

- 6) Section 4.4.1 of the ESR notes that a residential area is located approximately 200 metres south of the bridge on Queen Street, and section 8.6 states, *“Construction noise and vibration impacts are temporary in nature but will be noticeable at times. The municipal by-law hours*

of construction operation should be adhered to or an exemption requested by the contractor. If public complaints are received, they should be addressed as required." Noise control measures should be incorporated into construction mitigation plans in order to mitigate adverse noise impacts to nearby residential land uses within the study area during construction activities.

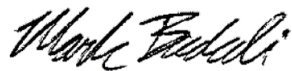
Surface Water

- 7) As noted in section 9.3 of the ESR, the proponent should confirm the need for registration in the Environmental Activity and Sector Registry (EASR). Please note that any water extraction over 50,000 L/day will require MECP approval(s) under the *Environmental Protection Act* and *Ontario Water Resource Act*, such as a Permit to Take Water (PTTW). Certain water taking activities that have been prescribed by the Water Taking Regulation O. Reg. 63/16 may require EASR registration instead of a PTTW. Regardless, a PTTW is required if the water-taking exceeds 400,000 litres per day. More information regarding the EASR and PTTW is accessible online at this link: www.ontario.ca/page/water-taking-and-transfer-user-guide-clarifications-and-exemptions, and at this link: www.ontario.ca/page/water-taking-user-guide-environmental-activity-and-sector-registry#:~:text=If%20the%20water%20takings%20are,a%20permit%20is%20not%20required
-

Thank you for circulating this ESR for the ministry's consideration. Please document the receipt of this Project Review Unit Comments letter in the ESR. We look forward to receiving a written response from Middlesex County 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, Environmental Assessment Branch
Ontario Ministry of the Environment, Conservation and Parks

cc Pierre Adrien, Manager, London District Office, MECP
Marc Bechard, Water Compliance Supervisor, Sarnia District Office, MECP
Brent Visscher, Project Manager, Dillon Consulting Limited
Greg Hayes, Environmental Planner, Dillon Consulting Limited

August 31, 2022

Ministry of the Environment, Conservation and Parks
Project Review Unit, Environmental Assessment Branch

Sent via email: Mark Badali, Regional Environmental Planner
mark.badali1@ontario.ca

**RE: Project Review Unit Comments – Environmental Study Report
Blacks Bridge Municipal Class Environmental Assessment
County of Middlesex**

12 James Street N
Suite 401
Hamilton, Ontario
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905.901.2912
Fax
416.229.4692

Dear Mr. Badali,

Thank you for your comments regarding the Environmental Study Report (ESR) for the Blacks Bridge Class Environmental Assessment (EA) study. We have reviewed your letter dated July 21, 2022 and can provide the following additional information. For ease of reference, we have structured this response following the format of your comments.

This letter will be appended to the Final ESR within our files and on the County of Middlesex website. An updated ESR will not be published for an additional review period.

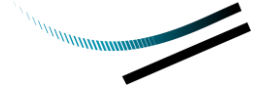
Planning and Policy

- 1) The Ontario *Planning Act* requires that planning decisions be “consistent” with the *Provincial Policy Statement* (PPS), 2020. The PPS includes policies for “Transportation Systems,” which are defined as, “...corridors and rights-of-way for the movement of people and goods...” Transportation systems are also included in the definition of “infrastructure” in the PPS.

The PPS requires that proponents consider significant provincial resources, including prime agricultural areas, natural heritage features, ground water, surface water, archaeological resources, and built heritage resources. These significant provincial resources are considered in the ESR as follows:

- Existing conditions are documented in **Section 4**
- These considerations are incorporated into the evaluation of alternative solutions and design options in **Sections 5 and 6**
- Potential impacts are assessed, and mitigation measures recommended, in **Section 8**.

The PPS also highlights the importance of safe and efficient transportation systems, and optimizing the use of existing infrastructure. Replacing Blacks Bridge with a new bridge resolves the safety issues that resulted in the



closure of the existing bridge, and eliminates the load and height restrictions that were in effect prior to its closure. These improvements are consistent with the PPS policies that call for safe and efficient transportation systems. Furthermore, replacing the bridge with a single-span bridge at the same location on the same alignment limits the requirement for new infrastructure as well as the potential for impacts to natural heritage and prime agricultural areas.

Indigenous Consultation

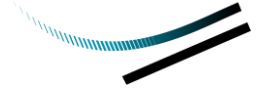
- 2) We will continue reaching out to Indigenous communities if required due to project changes or permits of interest to the communities, as requested in your letter. If subsequent applications to the Ministry of the Environment, Conservation and Parks (ministry) are required, records of such additional consultation will be provided.

Public Consultation

- 3) Notifications for this project were completed in accordance with the conditions in the local area, in consultation with the County of Middlesex. It is our understanding that the *London Free Press* has a limited subscribership in the area where the project is located, and there is no alternative local newspaper. As a result, online notification is considered a more effective means of reaching the local community.

Throughout the study, notices were published in one edition of the *London Free Press*, posted on the County of Middlesex website, and advertised by the County and the Municipality of North Middlesex via social media. In accordance with Section A.3.5.2 of the Municipal Class EA, this was determined to be the most suitable and effective means of involving the public and is consistent with the County of Middlesex's approach for other public notifications.

- 4) Consistent with the approach described under item 3 above, the Notice of Completion was distributed as follows:
 - June 20, 2022 – Dillon mailed the Notice to non-email contacts on the study contact list
 - June 22, 2022 – The County uploaded the Notice to its website along with the ESR, and advertised the posting of the ESR via social media
 - June 23, 2022 – Dillon emailed the Notice to email contacts on the study contact list
 - June 23, 2022 – The Notice was published in the *London Free Press*.



Monitoring

- 5) Monitoring requirements will be developed during the detailed design stage once project specific details are determined and in accordance with any permits, approvals, licenses, or authorizations obtained prior to construction. If, during detailed design or construction, changes are required to identified mitigation measures, they would be implemented through provisions in the construction contract as administered by the contract administrator.

Noise and Vibration

- 6) Noise control measures including timing restrictions and standard mitigation measures will be developed during detailed design and incorporated into the construction contract in accordance with the local noise by-law. No night work is anticipated to be required for this project.

Surface Water

- 7) As noted in the ESR, the need for an Environmental Activity and Sector Registry will be confirmed during detailed design. A Permit to Take Water is not expected to be required based on the anticipated water extraction volumes. When water extraction volumes are determined, the appropriate approvals will be sought from the ministry, if required.

Should you have further questions or concerns, please do not hesitate to contact me at 905-901-2912 ext. 3455, or GHayes@dillon.ca.

Sincerely,

DILLON CONSULTING LIMITED

Greg Hayes
for Brent Visscher, P.Eng.
Project Manager

GJH:mdk

cc: Chris Traini, County Engineer, County of Middlesex

Our file: 20-3135

Ministry of Tourism, Culture and Sport

Programs and Services Branch
400 University Ave, 5th Flr
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Ministère du Tourisme, Culture et Sport

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July 21, 2022

EMAIL ONLY

Brent Visscher, P.Eng.
Project Manager
Dillon Consulting Limited
51 Breithaupt Street, Suite 200
Kitchener, N2H 5G5
bvisscher@dillon.ca

MTCS File : 0012732
Proponent : County of Middlesex
Subject : MCEA – Schedule C - Notice of Completion
Project : Blacks Bridge
Location : County of Middlesex

Dear Brent Visscher:

Thank you for providing the Ministry of Tourism, Culture and Sport (MTCS) with the Notice of Completion for the above-referenced project. MTCS's interest in this Environmental Assessment (EA) project relates to its mandate of conserving Ontario's cultural heritage.

Under the EA process, the proponent is required to determine a project's potential impact on known (previously recognized) and potential cultural heritage resources.

Project Summary

The County of Middlesex retained Dillon Consulting Limited to complete a Municipal Class Environmental Assessment (EA) study to determine the preferred long-term solution for the future use of Blacks Bridge. The study was completed in accordance with the planning and design process for Schedule 'C' projects under the Municipal Class EA (2000, as amended).

Project Comments

We have reviewed the Project File Report (PFR) (dated June 2022, by Dillon Consulting) and the associated technical cultural heritage studies included in Appendix D:

- Cultural Heritage Evaluation Report & Heritage Impact Assessment ((dated March 18, 2022, by Timmins Martelle Heritage Consultants Inc.) (CHER/HIA)

We find that overall cultural heritage due diligence has been undertaken, however we have a couple of observations and comments to ensure proper due diligence documentation:

- Terminology throughout the documentation should be consistent with current legislation and policy.
- The PFR does neither indicate the Project Information Form number for the archaeological assessment nor include the assessment in the Appendices. Our records indicate that a Stage 1 and 2 archaeological assessment under Project Information Form (PIF) (P359-0126-2021) is underway and has yet to be submitted for MTCS review. We would appreciate confirmation of the PIF number.

Please note that archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommend that:

1. the archaeological assessment of the project area is complete and
2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through an avoidance and protection strategy.

Approval authorities typically wait to receive the ministry's review letter for an archaeological assessment report before making a decision on an EA, because the letter will confirm that the report has been entered into the Register and will include the recommendations that there are no further concerns for impacts to archaeological resources, or next steps to mitigate those concerns.

- The CHER/HIA has determined that Black's Bridge is of cultural heritage value or interest and recommended mitigation strategies based on the preferred alternative. The CHER/HIA is included in PFR Appendix D.

We have attached a table with detailed comments and recommendations to support documentation around cultural heritage due diligence.

Thank you for consulting MTCS on this project. If you have any questions or require clarification, please do not hesitate to contact me.

Sincerely,

Joseph Harvey
Heritage Planner
joseph.harvey@Ontario.ca

Copied to: Chris Traini, County Engineer, Middlesex County
Greg Hayes, Project Consultant, Dillon Consulting Limited
Karla Barboza, Team Lead, Heritage Planning Unit
Mark Badali, Environmental Resource Planner & EA Coordinator, MECP

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. MTCS makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MTCS be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Please notify MTCS (at archaeology@ontario.ca) if archaeological resources are impacted by EA project work. All activities impacting archaeological resources must cease immediately, and a licensed archaeologist is required to carry out an archaeological assessment in accordance with the *Ontario Heritage Act* and the Standards and Guidelines for Consultant Archaeologists.

If human remains are encountered, all activities must cease immediately, and the local police and coroner must be contacted. In situations where human remains are associated with archaeological resources, MTCS should also be notified (at archaeology@ontario.ca) to ensure that the site is not subject to unlicensed alterations which would be a contravention of the *Ontario Heritage Act*.

Item	Document Section	Given Text	MTCS Comments
1.	Throughout the documentation	Ministry name "Ministry of Heritage, Sport, Tourism, and Culture Industries"	Please ensure the current name of the Ministry "Ministry of Tourism, Culture and Sport (MTCS)" or subsequent name is used throughout the PFR documentation.
2.	Throughout the documentation	Terms "heritage value", "cultural heritage value", "heritage value or interest"	To align with current legislation and policy the terms "cultural heritage value", "heritage value" "Heritage value or interest" should be replaced with "cultural heritage value or interest".
3.	4.5 (Cultural Resources) Pages 30-32	<p>4.5.1 Heritage</p> <p>A Cultural Heritage Evaluation Report (CHER) was completed in September 2020 by Timmins Martelle Heritage Consultants Inc. (TMHC). The CHER concluded that Blacks Bridge has cultural heritage value. Specifically, the bridge was found to meet the Ontario Regulation 9/06 criteria for identification as a heritage property on the basis of its design/physical value and historical/associative value.</p> <p>The CHER was subsequently combined with a Heritage Impact Assessment (HIA), the results of which are summarized in Section 8.9. The combined CHER/HIA (TMHC, March 2022) is included in Appendix D.</p> <p>4.5.2 Archaeology</p> <p>A Stage 1 Archaeological Assessment was completed by FAC in January 2022. The Study Area and the results of the assessment are depicted in Figure 10 and summarized below.</p> <p>Due to the site location on the banks of the Ausable River and the presence of nearby archaeological sites, the Study Area generally has a high potential for Indigenous and Euro-Canadian archaeological resources. No registered archaeological sites were identified within proximity to the Study Area; however, a previous archaeological study approximately 150 metres to the east recovered a projectile point.</p>	<p>For clarity and consistency with current terminology, MTCS recommends organizing section 4.5 in the following manner:</p> <p>4.5 Cultural Heritage Resources:</p> <p>Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes.</p> <p>4.5.1 Built Heritage Resources and Cultural Heritage Resources</p> <p>A Cultural Heritage Evaluation Report (CHER) was completed in September 2020 by Timmins Martelle Heritage Consultants Inc. (TMHC). The CHER concluded that Blacks Bridge has cultural heritage value or interest. Specifically, the bridge was found to meet the Ontario Regulation 9/06 criteria for identification as a heritage property on the basis of its design/physical value and historical/associative value.</p> <p>The CHER was subsequently combined with a Heritage Impact Assessment (HIA), the results of which are summarized in Section 8.9. The combined CHER/HIA (TMHC, March 2022) is included in Appendix D.</p>

Item	Document Section	Given Text	MTCS Comments
		<p>Portions of the Study Area have previously been extensively disturbed due to construction, primarily related to the bridge and changing roadway alignments over time. These areas do not retain archaeological potential.</p> <p>Areas where no disturbance has been documented or the level of disturbance could not be confirmed visually during the Property Inspection retain high archaeological potential. These areas include most of the floodplain on the west side of the river, as there is potential for buried deposits below any surface disturbance.</p>	<p>4.5.2 Archaeological Resources</p> <p>A Stage 1 Archaeological Assessment was completed by FAC in January 2022. The Study Area and the results of the assessment are depicted in Figure 10 and summarized below.</p> <p>Due to the site location on the banks of the Ausable River and the presence of nearby archaeological sites, the Study Area generally has a high potential for Indigenous and Euro-Canadian archaeological resources. No registered archaeological sites were identified within proximity to the Study Area; however, a previous archaeological study approximately 150 metres to the east recovered a projectile point.</p> <p>Portions of the Study Area have previously been extensively disturbed due to construction, primarily related to the bridge and changing roadway alignments over time. These areas do not retain archaeological potential.</p> <p>Areas where no disturbance has been documented or the level of disturbance could not be confirmed visually during the Property Inspection retain high archaeological potential. These areas include most of the floodplain on the west side of the river, as there is potential for buried deposits below any surface disturbance.</p> <p>A Stage 1&2 archaeological assessment (Project Information Form (PIF) [include number], [January 2022]) was undertaken by [FAC Fischer..] for Blacks Bridge . A Stage 1&2 AA consists of a review of geographic, land use and historical information for the property and the relevant surrounding area, a property visit to inspect its current condition and contacting MTCS to find out whether, or not, there are any known archaeological sites on or near the property. Its purpose is to identify areas of</p>

Item	Document Section	Given Text	MTCS Comments
			<p>archaeological potential and further archaeological assessment (e.g., Stage 3-4) as necessary. The Stage 1-2 AA is included in Appendix X.</p> <p>[Then include the outcomes and recommendations of the report, as in Executive Summary – Copy and paste do not summarize]</p> <p>Please include the MTCS letter indicating that the report has been entered into the Ontario Public Register of Archaeological Reports (Register) in the Appendix.</p> <p>MTCS may have additional comments on section 4.5 once the Stage 1 and 2 archaeological assessment has been entered into Register.</p>
4.	<p>5.2 (Evaluation of Alternative Solutions)</p> <p>Table 4: Comparative Evaluation of Alternative Solutions</p> <p>Pages 40-41</p>	<p>Criteria</p> <ul style="list-style-type: none"> • Socio-Economic Environment: Cultural Heritage Resources • Socio-Economic Environment: Archaeological Resources <p>Metric</p> <ul style="list-style-type: none"> • Impacts to heritage value of bridge (form and function) • Potential for impacts to archaeological resources 	<p>MTCS recommends the following revision to better align with the current terminology and proposed Section 4.5 of the PFR.</p> <p>Criteria</p> <ul style="list-style-type: none"> • Socio-Economic Environment: Cultural Heritage Landscapes and Built Heritage Resources • Socio-Economic Environment: Archaeological Resources <p>Metric</p> <ul style="list-style-type: none"> • Impacts to cultural heritage value or interest of the bridge (form and function) • Potential for impacts to archaeological resources

Item	Document Section	Given Text	MTCS Comments
5.	8.9 (Cultural Heritage) Pages 61-62	<p>8.9 Cultural Heritage</p> <p>This project involves removal of Blacks Bridge, which has been identified as having cultural heritage value (Section 4.5.1). A HIA assessing the preferred design option was completed by TMHC and combined with the CHER completed earlier in the study. The CHER/HIA (TMHC, March 2022) is included in Appendix D.</p> <p>...</p>	<p>MTCS recommends the following revisions align with current legislation and policy.</p> <p>8.9 Built Heritage Resources and Cultural Heritage Landscapes</p> <p>This project involves removal of Blacks Bridge, which has been identified as having cultural heritage value or interest (Section 4.5.1). A HIA assessing the preferred design option was completed by TMHC and combined with the CHER completed earlier in the study. The CHER/HIA (TMHC, March 2022) is included in Appendix D.</p> <p>...</p>
6.	8.10 (Archeological Resources) Page 64	<p>8.10 Archeological Resources</p> <p>The preliminary design is expected to impact lands that were identified as having archaeological potential in the Stage 1 archaeological assessment completed as part of this study (Figure 10). A Stage 2 archaeological assessment is planned to be undertaken spring/summer 2022, in coordination with Indigenous field monitors. Additionally, a Stage 1-2 archaeological assessment will be completed for the additional lands that are being considered for a construction laydown area (Section 7.3). The results of these studies will be documented in a combined Stage 1-2 archaeological assessment report.</p> <p>MHSTCI acceptance of required archaeological assessment report(s) into the Ontario Public Register of Archaeological Reports is required prior to ground disturbance within undisturbed areas with archaeological potential.</p>	<p>MTCS recommends the following revisions align with current legislation and policy.</p> <p>8.10 Archaeological Resources</p> <p>The preliminary design is expected to impact lands that were identified as having archaeological potential in the Stage 1 archaeological assessment completed as part of this study (Figure 10). A Stage 2 archaeological assessment is planned to be undertaken spring/summer 2022, in coordination with Indigenous field monitors. Additionally, a Stage 1-2 archaeological assessment will be completed for the additional lands that are being considered for a construction laydown area (Section 7.3). The results of these studies will be documented in a combined Stage 1-2 archaeological assessment report.</p> <p>A Stage 2 AA (and any further archaeological assessments, as recommended) will be undertaken by a licensed archaeological as early as possible during detail design and prior to any ground disturbing activities.</p>

Item	Document Section	Given Text	MTCS Comments
			<p>MTCS letter indicating that the archaeological assessment report(s) have been entered into the Ontario Public Register of Archaeological Reports is required prior to any ground disturbance within undisturbed areas with archaeological potential. Archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where and MTCS issues a letter indicating the archaeological assessment of the project area is complete and all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through an avoidance and protection strategy.</p> <p>If archaeological resources are impacted by EA project work, notify the Ministry of Tourism, Culture and Sport (MTCS) at archaeology@ontario.ca. All activities impacting archaeological resources must cease immediately, and a licensed archaeologist is required to carry out an archaeological assessment in accordance with the <i>Ontario Heritage Act</i> and the Standards and Guidelines for Consultant Archaeologists.</p> <p>If human remains are encountered, all activities must cease immediately, and the local police and coroner must be contacted. In situations where human remains are associated with archaeological resources, MTCS should also be notified at (archaeology@ontario.ca) to ensure that the site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>.</p>

Item	Document Section	Given Text	MTCS Comments
7.	9.0 (Commitments to Future Work) Pages 65-66	<p>...</p> <p>9.2 Recommended Additional Studies</p> <p>The following additional studies are recommended to be completed prior to construction:</p> <ul style="list-style-type: none"> • Stage 1 Archaeological Assessment of additional lands that are being considered for a construction laydown area; • Stage 2 Archaeological Assessment prior to ground disturbance within areas identified as having archaeological potential in the Stage 1 assessments completed as part of this study; • ... <p>9.3 Anticipated Permits, Approvals, and Exemptions</p> <p>It is anticipated that the following permits, approvals, and exemptions will need to be obtained prior to construction start:</p> <ul style="list-style-type: none"> • ... • MHSTCI acceptance of required archaeological assessment report(s) into the Ontario Public Register of Archaeological Reports prior to ground disturbance within undisturbed areas with archaeological potential. 	<p>MTCS recommends the following revision to better align with the current legislation and the revisions to PFR Section 8:</p> <p>9.2 Recommended Additional Studies</p> <p>The following additional studies are recommended to be completed as early as possible during detailed design and prior to any ground disturbing activities, including construction:</p> <ul style="list-style-type: none"> • Stage 1 Archaeological Assessment of additional lands that are being considered for a construction laydown area; • Stage 2 Archaeological Assessment (and any further archaeological assessment, as recommended) within areas identified as having archaeological potential in the Stage 1 assessments completed as part of the study; <p>9.3 Anticipated Permits, Approvals, and Exemptions</p> <p>It is anticipated that the following permits, approvals, and exemptions will need to be obtained prior to construction start:</p> <ul style="list-style-type: none"> • ... • MHSTCI acceptance of required archaeological assessment report(s) into the Ontario Public Register of Archaeological Reports prior to ground disturbance within undisturbed areas with archaeological potential. MTCS letter indicating that the archaeological assessment report(s) have been entered into the Ontario Public Register of Archaeological Reports and that the archaeological assessment of the project area is complete and all archaeological

Item	Document Section	Given Text	MTCS Comments
			sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through an avoidance and protection strategy.



August 31, 2022

Ministry of Tourism, Culture and Sport
Programs and Services Branch

Sent via email: Joseph Harvey, Heritage Planner
joseph.harvey@ontario.ca

**RE: Project Review Unit Comments – Environmental Study Report
Blacks Bridge Municipal Class Environmental Assessment – Schedule C
County of Middlesex**

Dear Mr. Harvey,

Thank you for your comments regarding the Environmental Study Report (ESR) for the Blacks Bridge Class Environmental Assessment (EA) study. We have reviewed your letter dated July 21, 2022 and can provide the following additional information.

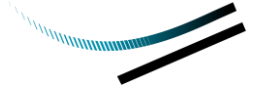
As indicated via email on July 21, 2022, there is a single Stage 1-2 Project Information Form (PIF) number for this project: P359-0126-2021. Since the construction laydown area was added during the process and before the Stage 2 component was completed, a second PIF number was not required, but the Stage 1 background in the report is being updated to include the laydown area.

A combined Stage 1-2 assessment is being completed because a Stage 2 archaeological assessment was expected to be required from the outset. The Stage 2 fieldwork is now complete, and no archaeological resources were encountered. The Stage 1-2 report will be submitted to the Ministry of Tourism, Culture and Sport (MTCS) when it is complete.

As indicated in the ESR and revised in your comments, we acknowledge that an MTCS letter indicating that the archaeological assessment report has been entered into the Ontario Public Register of Archaeological Reports is required prior to any ground disturbance. Further, we understand the letter must indicate the archaeological assessment of the project area is complete and all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the *Ontario Heritage Act*) or that mitigation of impacts has been accomplished through an avoidance and protection strategy.

We appreciate your detailed comments and recommendations with respect to clarity and consistency with current terminology. We will apply this updated terminology to future EA reports.

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416.229.4692



Since the ESR has been finalized and published for public review, we have not revised the wording in the report itself. However, this letter will be appended to the Final ESR within our files and on the County of Middlesex website, along with your July 21, 2022 letter. An updated ESR will not be published for an additional review period.

Should you have further questions or concerns, please do not hesitate to contact me at 905-901-2912 ext. 3455, or GHayes@dillon.ca.

Sincerely,

DILLON CONSULTING LIMITED

Greg Hayes
for Brent Visscher, P.Eng.
Project Manager

GJH:mdk

cc: Chris Traini, County Engineer, County of Middlesex

Our file: 20-3135