

*TPA Process Phase Consultation and Engagement*

**C6 – Agency Correspondence**

Correspondence

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**From:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>

**Sent:** December-10-20 10:16 AM

**To:** Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>

**Cc:** Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>; Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Khaled, Sami <[Sami.Khaled@wsp.com](mailto:Sami.Khaled@wsp.com)>; Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>; Linker, Margot (MECP) <[Margot.Linker@ontario.ca](mailto:Margot.Linker@ontario.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**Attachments:** Draft Stage 2 ION LRT EPR Nov 2020 Kitchener to Cambridge - Surface Water Review.pdf; GW\_STAGE 2 ION-LRT-Region of Waterloo EA-Novemeber-10-2020.pdf; Noise Vibration Review Letter- Nov 17 2020.pdf; Stage 2 Ion Light Rail Transit Kitchener to Cambridge \_DRAFT\_20201127.pdf; MECP\_IONStage2TPAP-DraftEPR-Comments\_Dec10.pdf

Hello Sandy and Matthew,

Thank you for sharing the draft EPR with MECP. Please find the ministry's comments in the attached memo, including technical comments in the attached PDFs.

Kind regards,

**Stephen Deneault** | Project Evaluator

Environmental Assessment Services | Environmental Assessment Branch

**Ministry of the Environment, Conservation and Parks** | 135 St. Clair Avenue West, Toronto, ON M4V 1P5

☎: 437-247-3443 | ✉: [Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)

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**From:** Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>

**Sent:** October 23, 2020 1:57 PM

**To:** Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>

**Cc:** Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>; Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Khaled, Sami <[Sami.Khaled@wsp.com](mailto:Sami.Khaled@wsp.com)>; Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hi Cindy,

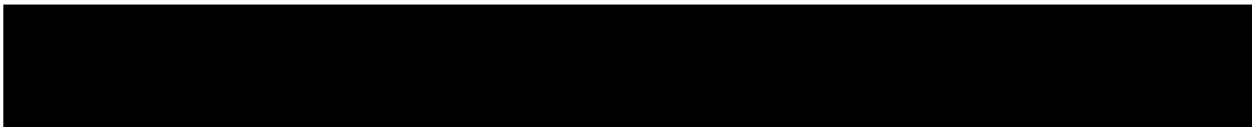
Thanks for responding back to me before our meeting next week.

As part of the Transit Project Assessment [TPA] Process for the Stage 2 ION LRT from Kitchener to Cambridge, a draft Environmental Project Report (EPR) has been prepared (along with supporting environmental and engineering studies, and public meeting materials).

We would like to invite MECP to review and provide feedback on the draft EPR document prior to issuing the Notice of Commencement of the Transit Project Assessment Process for public review. It's a big report, so we are hoping that you will focus primarily on the content and less on editing for style. Notwithstanding that, if you do come across anything that is stated inaccurately, or is unclear or grammatically incorrect, please do point that out. Note that there are still a few things that we are working on:

- The document has not yet been formatted for AODA compliance.
- Table 7-3 (Summary of Potential Impacts, Mitigation, and Commitments to Future Work and Monitoring) is not included in this draft (the table structure is there, but without content). This table is a summary of the key points from the narrative sections of Section 7, so it is not really "new" content. We wanted to hold off on this until we addressed comments from your review.
- We are still sourcing a few remaining sets of meeting notes for Appendix B.
- We need to do one more pass through the document to check for:
  - Consistent heading, bullet and table styles throughout the document
  - Tables and figures are all numbered, and numbered consecutively
  - Cross-references in the text to tables, figures, appendices and other sections are correct
  - Certain terminology is consistent throughout the document (e.g. Stage 2 ION, phase vs stage, etc.)
  - References to direction are consistent, particularly in Preston (e.g. how we reference north/south vs east/west)
- We acknowledge that the file sizes are still quite large and we will need to consider how best to reduce these to be manageable yet not impact the quality of the figures.

If you are interested in reviewing the document or any of the appendices which include the Air Quality Report (Appendix C7), Noise and Vibration Report (Appendix C8) amongst others, please use the link below to request access.



Please let us know if MECP plans to provide review comments at this time and of course we can discuss further next week. We would appreciate receiving any written comments by the end of the day on Thursday, November 12.

If you wish to obtain further information or have any questions prior to our meeting next week, please feel free to reach out to me or any of our project team members copied above.

Best Regards,

Sandy

**J.A. (Sandy) Nairn, RPP**

T +1 647-203-9975



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**From:** Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>

**Sent:** Friday, October 23, 2020 11:09 AM

**To:** Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>

**Cc:** Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

Good Morning Sandy,

Please send the documents to me electronically. We are not accepting hard copies at this time because we are all still working remotely. Either myself or someone else in my group will distribute the documents internal to the ministry's regional offices and other programs areas for review. At our meeting next week, we should be able to confirm who will be responsible for reviewing and coordinate the technical review for this project.

Thanks,

**Cindy Batista** | Special Project Officer | Transit Coordinator  
Environmental Assessment Services | Environmental Assessment Branch  
**Ministry of the Environment, Conservation & Parks**  
135 St. Clair Avenue West, 1st Floor, Toronto, ON M4V 1P5  
**Phone:** 437-248-0058 | **Email:** [cindy.batista@ontario.ca](mailto:cindy.batista@ontario.ca)

*If you have any accommodation needs or require communication supports or alternate formats, please let me know.*

*Si vous avez des besoins en matière d'adaptation, ou si vous nécessitez des aides à la communication ou des médias substitués, veuillez me le faire savoir.*

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**From:** Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>  
**Sent:** October 22, 2020 3:59 PM  
**To:** Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>  
**Subject:** Stage 2 ION - Draft Environmental Project Report Review/Comments

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hi Cindi,

Further to my voice mail message and prior to our meeting next week can we chat about the circulation of the Draft EPR for the Waterloo Stage 2 Ion LRT project and associated technical appendices to MECP.

I can provide you a link to the document and appendices if you like.

Thanks,

Sandy

**J.A. (Sandy) Nairn, RPP**  
National Manager, Environmental Planning  
Environment



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Pronouns: he, him, his

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November 25, 2020

## **MEMORANDUM**

**TO:** Cindy Batista, Special Project Officer, Transit Coordinator  
Environmental Assessment Branch  
Ontario Ministry of the Environment, Conservation and Parks

**FROM:** Mohammad Sajjad Khan  
Surface Water Specialist, Technical Support Section, West Central Region  
Ontario Ministry of the Environment, Conservation and Parks

**RE: DRAFT ENVIRONMENTAL PROJECT REPORT FOR THE PROPOSED  
STAGE 2 ION LIGHT RAIL TRANSIT FROM KITCHENER TO  
CAMBRIDGE (SURFACE WATER REVIEW)**

As requested, I have completed my surface water review of the subject report; the report titled, "Stage 2 ION: Light Rail Transit from Kitchener to Cambridge, Environmental Project Report - Draft," prepared by WSP, dated October 2020.

## **BACKGROUND**

The Ministry's Environmental Assessment Branch has received a draft Environmental Project Report (EPR) for the proposed Stage 2 ION Light Rail Transit (LRT) from Kitchener to Cambridge, along with supporting environmental and engineering studies, and public meeting materials, from the Region of Waterloo. The Region intends on formally initiating the transit project assessment process this year and would like the ministry to review and provide feedback on the draft EPR document prior to issuing its Notice of Commencement, under the Transit Projects Regulation, for public review.

Ministry's Environmental Assessment Branch has asked respective program areas within the ministry to review the documentation as it relates to noise/vibration, air quality, source water protection, surface water, hydrogeology, and species at risk. My

review covers surface water related issues only. The review results are summarized below.

## **REVIEW RESULTS**

The proposed Stage 2 ION LRT corridor is 18 km long and consists of 10 km on-street and 8 km off-street sections. The entire length of the corridor is located within the Grand River Watershed passes through the floodplains of the Grand River, Speed River, Groff Mill Creek, Mill Creek and Downtown Cambridge Galt City Centre Special Policy Area, being managed by the GRCA.

Potential impacts and mitigations crossing these water courses are discussed at high-level in the draft EPR which were related to fish and fish habitat, mussels and mussels' habitat, SAR fish, SAR mussels, stormwater, erosion, floodplain, geomorphology, and drinking water intake protection zones. A detail impact analysis and mitigation plan will be completed at the design phase of the project.

During my review of the report, I have noted all potential surface water related issues were covered. However, a detail review of all those issues does not fall within the scope of my review. For example, impacts on fish and fish habitat, mussels and mussels' habitat, geomorphology, and floodplain do not fall within the scope of my review. The agencies (i.e., GRCA, MNRF, and/or DFO) responsible for authorizing works in the floodplain and in-water, will be reviewing those materials in-depth evaluating baseline data and assessing impacts before issuing authorizations, I believe. Already some pre-consultations happened with those agencies on this project.

The proposed LRT alignment is located within the surface water Intake Protection Zone (IPZ) of Hidden Valley Intake located in Hidden Valley Creek, Hofstetter Creek, Grand River and Freeport Creek. A review of impact on the IPZs should be done by the ministry's source water protection branch, GRCA, and municipalities responsible for managing the drinking water sources. This review also does not fall within the scope of a surface water specialist working at the regional office of the ministry.

Drainage and stormwater work for this project also do not fall within the scope of my review. Out of 33 drainage outlets, 21 drainage outlets discharge to existing sewer systems. As majority of the runoff from the LRT corridor will be discharged to the cities existing system, respective cities (i.e., City of Kitchener and City of Cambridge) will review the drainage and stormwater system to evaluate adequacy of the existing system to accommodate additional volume of runoff and peak flows.

Some stormwater from a few sections of the corridor will be discharged directly to the natural environment through OGSs (oil grit separators). The existing drainage pattern would generally be maintained except the two major river crossings (Grand River and Speed River) where runoff will be collected at bridge sag points, treated and conveyed to the respective rivers. A great length of discussion has already happened with the GRCA to identify locations of the stormwater outlets to the natural environment. Installation of OGS units will be evaluated further in a future design phase.

I believe, an Environmental Compliance Approval (ECA) from the Ministry of Environment, Conservation and Parks (MECP) will be required for all storm sewers, OGS units, and stormwater treatment BMPs. Ministry's environmental assessment branch may reach out the approval branch at this planning stage to solicit their opinion on the design and treatment concepts being considered.

After a careful reading of the EPR, I did not find any scope of involvement of a regional surface water specialist of the ministry to review the report. However, an involvement of a surface water specialist may be required at the construction phase of the project if a PTTW and/or an ECA are required to protect the receiving surface waters. There could be another scope of involvement at the implementation stage of the project when an operational ECA will be issued by the ministry for the stormwater system to confirm effluent criteria. Usually standard effluent criteria are used approving the municipal stormwater works where a regional tech support office is not involved.

Should you require any clarifications to any of my comments provided above, please do not hesitate to contact me.

With regards,



Mohammad Sajjad Khan, Ph.D., P.Eng.

- c. WCR Tech Support Paper File E 06 LA-24-01  
Abdul Quyum, Hydrogeologist, WCR, MECP

Ministry of the Environment,  
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Drinking Water and Environmental  
Compliance Division  
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Date: November 10, 2020

To: Cindy Batista, Special Project Officer, Transit Coordinator,  
Environmental Assessment Services, Environmental Assessment Branch

From: Abdul Quyum, Hydrogeologist, Technical Support Section (TSS)

Re: Environmental Project Report – Stage 2 ION  
Region of Waterloo, Ontario

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As requested, I have reviewed the following report:

- *Environmental Project Report - Draft, Stage 2 ION: Light Rail Transit from Kitchener to Cambridge, WSP, October 2020.*

The purpose of the review was to evaluate whether the subsurface soil and groundwater conditions within the study area have been adequately described for evaluating potential groundwater quantity/quality impacts associated with the proposed project. The review was primarily focused on sections of the report that contained information on the local and regional geologic and hydrogeologic conditions.

This technical review does not include an evaluation of the potential impact of the proposed development on future climate change and source water protection related issues.

**Comments:**

The comments are outlined below:

1. Section 7.1.8, Groundwater and Contaminated Soils:

The potential for impacts on the existing groundwater receptors have not been adequately discussed. It is unclear whether the groundwater receptors (such as municipal water supply, private water supply or groundwater contribution to baseflow) exists within 250 m of the proposed light rail transit (LRT) route and whether those groundwater receptors will be adversely influenced by the proposed project, based on the consideration of the local geologic and hydrogeologic setting. In this regard, the consultant should include a section in the report detailing the local geologic conditions, existing private water supply wells/dewatering sites, municipal water supply source(s) and provide a technical rationale justifying/confirming that the existing private and municipal water supply wells will not be adversely affected as a result of the proposed project. Since the water supply in the region is groundwater based and

according to our understanding, the municipal water supply sources (confined overburden and bedrock aquifers) are hydraulically isolated from the shallow overburden aquifer, the potential for adverse impact on the municipal sources, in our opinion, is negligible, if any. Based on our experience with the Stage 1 ION, we do not anticipate potential adverse impacts on the municipal groundwater water supply sources. That said, relevant technical details (overburden and bedrock geology, municipal aquifers) as well as discussion should be provided in the report to substantiate that conclusion/finding.

2. Appendix C4 – Contamination Overview Study:

In addition to the contaminated site inventory and identification of areas of potential environmental concern, there are several known groundwater quality impacted properties within the vicinity of the proposed LRT corridor. The existence of known/unknown contaminated sites along the proposed LRT corridor have implications for the management of groundwater effluent (its discharge) in case a groundwater dewatering for lowering localized water table during construction is needed. In the absence of groundwater dewatering, the groundwater contaminant plume migration is unlikely. For construction dewatering exceeding the 50,000 L/day taking threshold, a Permit to Take Water (PTTW) will be required. As part of the PTTW process, a detailed hydrogeological study is expected to be completed for meeting the PTTW permitting requirements. The PTTW hydrogeological study will evaluate the potential for groundwater plume migration as well as management of the effluent dewatering discharge. At this stage, no further assessment/evaluation is needed for groundwater quality impact assessment associated with the known/unknown contaminated sites.

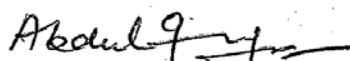
**Conclusion:**

In conclusion, we do not anticipate/expect the proposed LRT project will cause adverse impacts on the existing private and municipal groundwater water supply sources (municipal aquifer). The potential localized groundwater quality impacts associated with construction dewatering will be evaluated and addressed at a PTTW permitting stage.

I trust that the above comments will be of benefit. If you have any questions, I can be reached at 905-521-7817 or [abdul.quyum@ontario.ca](mailto:abdul.quyum@ontario.ca)

**Statement of Limitations:**

The purpose of the preceding review is to provide advice to the Ministry of the Environment regarding subsurface conditions based on a review of the information provided in the above referenced document. The conclusions, opinions and recommendations of the reviewer are based on information provided by others. The Ministry cannot guarantee that the information that has been provided by others is accurate or complete. A lack of specific comment by the reviewer is not to be construed as endorsing the content or views expressed in the reviewed material.



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Abdul Quyum, P.Eng., P.Geo. (AB)  
Hydrogeologist

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

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

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November 17, 2020

To: Cindy Batista  
Special Projects Officer  
Environmental Assessment Branch

From: Mahdi Zangeneh  
Senior Noise Engineer  
Environmental Permissions Branch

**Re: Noise and Vibration Impact Assessment  
Waterloo Light Rail Transit Phase 2 Extension  
Waterloo, Ontario  
Noise File No.: E0016-20**

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As requested, I have reviewed the noise and vibration report titled "Noise and Vibration Impact Assessment - Waterloo Light Rail Transit Phase 2 Extension Waterloo, Ontario" prepared by J.E. Coulter Associates Limited and dated March 9, 2020.

The following are my noise and vibration comments relating to the March 9, 2020 noise and vibration report noted above:

- 1) **Table 6 Incorrect Impact Sound Levels:** The daytime and nighttime Impact sound levels are incorrect for R1, R15, R27, and R28. The impact sound levels are reported to be 0 dB. However, the difference between the "No Project Sound Levels" and the "With Project Sound Levels" yields non-zero values.
- 2) **Description, Map and Figures:** The project involves several components. The introduction section of the report should include a description / listing of all the project components such as rail tracks, stations, rail maintenance facilities, traction power substations, special track works (crossovers / switches), etc. The

locations of these project components should be clearly (not approximately) shown in figures (aerial photographs) c/w scale and legend. Include a key map to show the following items at minimum:

- a. route and corridor items listed in Table 1
- b. points of reception listed in Table 2
- c. location of traction power substation listed in Table 7
- d. nearest receptor listed in Table 7

**Legend for Colour Coding:** Include a legend for the colour coding used in the Figures.

**Section, 3.2 Power Substations:** Provide the number of traction power substations and locations.

- 3) **Assessment:** The noise and vibration impact assessments of all the project components referenced in item 2 above should be included in the report. If some project components are not assessed, then reason / justification should be provided for their exclusion from the noise and vibration assessment.
- 4) **Acoustic Barrier for R33:** Figure 26 shows the approximate location of the future acoustic barrier at receptor R33. The height and length of the recommended acoustic barrier (2 metres high and 55 meters long) to protect receptor R33 may be acoustically deficient. Figure 1-26 should show the height, length, and extents of this barrier. The location of the barrier should be within the right-of-way of the LRT corridor (not the property lines of private properties).
- 5) **Vibration:** Identify buildings / receptors that are in the categories for construction vibration limits in Table 14.
- 6) **Section 6:** the recommended vibration control measures need to be depicted in figures showing clearly their types and exact extents / locations.
- 7) **Traction power substations:** Figures 1 to 26, the locations of traction power substations should be identified relative to the receptors that they are closest to.
- 8) **Table 11 vibration calculations are missing.** Sample / representative noise and vibration calculations need to be included in the noise and vibration report.
- 9) **Typo in Section 7.5:** “Similarly, the construction of the bus terminals will use fairly standard equipment found in most urban construction sites.”. Please clarify if there is a bus terminal in the scope of work for the LRT project. Otherwise, correct the sentence by removing reference to bus terminal.
- 10) **100 metres:** Study area is limited to 100 metres to either side of the corridor. Provide justification to support this limitation. Provide figure(s) to show the location and extents of the study area.

- 11) **Exclusion Limits:** Publication NPC-300 Exclusion Limits should be used instead of Publication NPC-205. There is no limit of 47 dBA for the evening hours from 7pm to 11pm in Publication NPC-300.
- 12) **Closed Windows Reduction:** Closed windows noise reduction of 30 dB is an overestimation. In accordance with MECP guidelines, a 20 dB reduction is associated with closed windows.
- 13) **Track Types in Table 1:** Table 1, the Track Types C & TB should be defined.
- 14) **Worst case receptor height:** Thirty-eight (38) receptors were selected to represent the noise sensitive properties along both sides of the corridor. Why was the noise assessment limited to the first and second storey of these receptors? For townhouses and multi-rise buildings, the worst case storey (not the 1<sup>st</sup> or 2<sup>nd</sup> storey) should be used in the noise assessment.
- 15) **Vacant lots:** Noise sensitive vacant lots and approved (future) developments were not considered in the report. Confirmation should be provided in the report to indicate that the selected 38 receptors are the worst case (i.e. the closest and most exposed) noise sensitive properties along both sides of the corridor.
- 16) **Sound level adjustment:** The LRT vehicular sound levels should be adjusted when these vehicles travel along the curved sections of the tracks. The suggested adjustment of 13 dB for wheel squeal seems appropriate. Adjustments should also be considered when these vehicles travel over special track-works (crossovers / switches).
- 17) **5 dB penalty for Traction Power Substations -Table 7-Section 5:** Add 5 dB tonal penalty in the sound power levels listed in Table 7. Furthermore, what is the number of the traction power substations (11 per text vs. 14 per Table 7)?
- 18) **Distance:** It is stated that vibration impacts will be negligible beyond 50 metres from tangent track and 100 metres from special trackwork. Where did these distances come from?
- 19) **Soil conditions:** Tables 8 and 10, were soil conditions considered in the vibration measurements?
- 20) **Section 6.2:** Receptors within 15 metres from the nearest track need to be identified. Similarly, any vibration control measures applicable to these receptors need to be specified.
- 21) **Isolation:** Table 11, Levels 1, 2 and 3 Isolation need to be defined.
- 22) **Vibration:** The four (4) properties listed on Page 17 of the report may require upgraded vibration isolation. The vibration control measures that may be applied at these four properties, need to be identified. Include a table of the receptors affected by vibration and types of vibration mitigation measures.

- 23) **Acoustic barriers:** Consideration will also be given to implementing noise barriers in areas that are relatively quiet but have not triggered the need for noise control under the current protocol. These areas need to be defined and clearly shown in figures along with the said noise barriers (heights, lengths and extents).
- 24) **Special trackwork:** Where located in areas with residences, consideration will be given to using moveable point frogs, spring frogs, and or monoblock-welded frogs. Figures showing the locations of these special trackwork (frogs) need to be included in the report.
- 25) **Vibration control:** The areas within 12 metres from the nearest track, of which there are four, may require significantly more vibration control in order to meet the applicable criteria. Figures showing the locations of these four areas and the types and extents of the vibration control measures need to be included in the report.
- 26) **Appendix A:** figure(s) need to be included to show the overall alignment of the new LRT line, the various project elements as well as the selected 38 receptors.
- 27) **Appendix B:** the provided STAMSON calculation sheets show that the new LRT vehicles were modelled as medium trucks. The new LRT vehicles should be modelled as ALRV in STAMSON. Sample representative STAMSON calculations with the new LRT vehicles modelled as ALRV should be included in the report.

In light of the above, the March 9, 2020 noise and vibration report need to be revised to address the above noted comments.

I trust the above noise and vibration review comments would be of assistance to you.

If you have any questions, please contact Mahdi Zangeneh at (437) 238-9038.

Regards,

*M. Zangeneh*

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Mahdi Zangeneh, P.Eng.

Senior Noise Engineer

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November 27, 2020

## MEMORANDUM

TO: Cindy Batista  
Special Project Officer  
Environmental Assessment and Permissions Division

FROM: Rui Zeng  
Air Quality Analyst  
Technical Support Section, West Central Region

RE: **Review of Environmental Project Report - Draft  
Stage 2 Ion: Light Rail Transit, Kitchener to Cambridge Program**

The following memorandum summarizes the comments on the *draft Environmental Project Report (EPR)* and *Appendix C7 "Air Quality Impact Assessment Report"* that support to the *Stage 2 ION: Light Rail Transit, Kitchener to Cambridge* project. The report was prepared by WPS and dated October 2020. The purpose of the air quality impact assessment was to describe the potential air quality impacts of the proposed undertaking on nearby sensitive receptors.

I have reviewed the report and have provided the following comments for your consideration on the Air Quality Impact Assessment (AQIA) and the draft Environmental Project Report (EPR):

AQIA:

- There will be some updates on the SO<sub>2</sub> and PM<sub>2.5</sub> Ambient Air Quality Criteria (AAQC) listed in Table 2-2. The 2020 target for 24-hour PM<sub>2.5</sub> will be updated to 27ug/m<sup>3</sup> in the new AAQC, which will be published in the future. Also, the 1-hour and annual SO<sub>2</sub> AAQCs have been revised, the 24-hour SO<sub>2</sub> AAQC has been removed and there is a new 10-minute SO<sub>2</sub> AAQC. Please refer to the following decision document for additional information on the revised SO<sub>2</sub> AAQCs:

[https://prod-environmental-registry.s3.amazonaws.com/2018-03/SO2%20Decision%20Document%20%28March%202018%29\\_0.pdf](https://prod-environmental-registry.s3.amazonaws.com/2018-03/SO2%20Decision%20Document%20%28March%202018%29_0.pdf)

- The 24-hour Benzo(a)pyrene AAQC in Table 2-2 should be 0.00005 ug/m<sup>3</sup> instead of 0.000005 ug/m<sup>3</sup>.

- The National Ambient Air Quality Objectives (NAAQO) published in 1999 is not recommended as a reference. Please refer to the up-to-date AAQC and Canadian Ambient Air Quality Standards (CAAQS) for air quality indicators.
- Please specify the regional meteorological data set that was used for the modelling.
- Please make notes in Tables 3-1, 3-2, 3-3, and 3-4 to clarify that the ambient background concentrations were included in the calculation of the reported concentrations.
- It is recommended to plot the sensitive receptors in a contour plot and illustrate which are the most impacted receptors.

EPR:

- It is suggested to include some descriptions with respect to the dust mitigation measures during the construction phase in Section 5.3.2 of the EPR report.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Rui Zeng". The signature is written in a cursive, flowing style.

Rui Zeng  
Air Quality Analyst, WCR

c.  
Natalie Stacey, Air, Pesticides and Environmental Planning Supervisor, WCR (A)

**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

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135 St. Clair Avenue W  
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**Tel.:** 416 314-8001  
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December 10, 2020

## **MEMORANDUM**

**TO:** Matthew O'Neil, P.Eng.  
Senior Engineer, Rapid Transit  
Transportation and Environmental Services  
Region of Waterloo

**FROM:** Stephen Deneault and Cindy Batista  
Environmental Assessment Services Section  
Ministry of the Environment, Conservation and Parks

**RE:** **Draft Stage 2 ION: LRT from Kitchener to Cambridge Environmental  
Project Report**

---

The Ministry of the Environment, Conservation and Parks (the ministry) has completed its review of the Region of Waterloo's draft Stage 2 ION: LRT from Kitchener to Cambridge Environmental Project Report (EPR). The review was carried out to determine whether the draft EPR meets the requirements and expectations set forth in the ministry's *Guide: Ontario's Transit Project Assessment Process* (Transit Guide) and the requirements set forth in Ontario Regulation 231/08, Transit Projects and Metrolinx Undertakings (Transit Projects Regulation).

The ministry's comments are being provided to the Region of Waterloo for consideration when finalizing the EPR for formal submission. Furthermore, attached to this letter are comments provided by the ministry's technical reviewers on the following:

- Surface water

- Noise and vibration
- Soil and groundwater
- Air quality

## **General Comments**

1. The draft EPR would benefit from a reorganization to make the document clearer and more comprehensive. For example, a final description of the transit project should be presented at the beginning of the report after the statement of purpose. It is recommended that you follow the EPR format outlined in Section 3.2.4 “Documentation requirements” of the Transit Guide, which lists the sections in this order:
  - Statement of purpose, study area and background information;
  - Project description, including preferred design method;
  - Existing conditions;
  - Impact assessment, mitigation and monitoring;
  - Consultation process, and,
  - Required permits and approvals.
2. While reading the draft EPR, some minor formatting errors were found in the report that should be fixed prior to finalizing the EPR. Please ensure that in-text tables and figures are referenced, and the Table of Contents is updated.

## **Executive Summary**

3. Before the main body of the EPR is introduced, it is recommended that the document should first summarize the project and EPR components in an executive summary. This would provide the reader with a high-level description of the mandatory information required in the Transit Guide. Please include an executive summary in the final EPR.

## **Climate Change**

4. Although the draft EPR provides climate change considerations in several sections of the report, what appears to be missing is how the Region of Waterloo will design the project to respond to extreme weather events. Please clarify and make appropriate changes, such as including a subsection on climate change adaptation considerations as part of the final EPR submission.

## **Species at Risk**

5. Bat species should be considered when undertaking baseline studies and surveys. Please consult with the ministry’s Species at Risk Branch at [SAROntario@ontario.ca](mailto:SAROntario@ontario.ca) for further direction on the appropriate mitigation measures, buffer zones, and authorization requirements for addressing potential impacts to habitat.

## **Consultation**

6. Appendix B is missing. Accordingly, a full review of this subsection can not be completed at this time. It is the ministry's expectation that a record of consultation efforts with all interested persons and Indigenous communities will be updated and included in the final version of the EPR. The consultation record should be provided to the ministry as soon as possible particularly with respect to your Indigenous community consultation so that the ministry can review this information.

## **Mitigation Measures**

7. It is noted that Table 7-3 (Summary of Potential Impacts, Mitigation, and Commitments to Future Work and Monitoring) is not included in the draft EPR (the table structure is there, but without content). Please complete this table and resubmit it to the ministry in a revised draft EPR.

## **Comments from MECP Kitchener Area Office**

8. Appendix C4: Any further environmental study reports where groundwater or soil contamination exists should be shared with the Guelph District Office to ensure adequate oversight of any potential contaminated soil/groundwater disposal.
9. Appendix C3 Section 7.5: Consideration should be given to having mobile treatment units available to handle sediment-laden water, should the planned measures (silt fence/haybales etc.) become overwhelmed due to storm events or otherwise. This is especially important in the environmentally sensitive areas of Freeport and Hidden Valley where sediment deposition could be more detrimental and more difficult to restore, similar to the mobile treatment units that were often required throughout the Phase 1 project area.
10. Appendix C3 Section 8.3.1: The Grand River bridge length is listed as 1.46 metres which appears to be an error.
11. Appendix C8 Section 3.2: The District Office should be advised of Traction Power Substation (TPSS) locations when they become available. The TPSS' require registrations on the Environmental Activity and Sector Registry (EASR) and nearby sensitive receptors should be identified well in advance to ensure they can meet NPC-300 guidelines, which will prevent delays such as the Waterloo Street TPSS in Kitchener.

## **Concluding Remarks**

Thank you for the opportunity to comment on the draft EPR. The above and attached documents reflect the ministry's comments that should be addressed by the Region of Waterloo prior to submitting a final EPR to the ministry, by way of a comment response

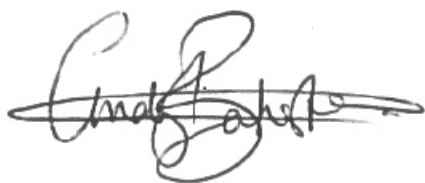
table, redline version of a revised EPR and supporting technical documentation. This information must include all the comments provided by the ministry, how these comments will be addressed and the location of these revisions in the EPR.

Please note that the ministry's comments (EA-related and technical), along with any comments received by other government agencies (e.g. the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI), the Ministry of Natural Resources and Forestry (MNR), the local conservation authority), Indigenous communities and the public should be considered and addressed by the Region of Waterloo prior to finalizing the EPR for submission. It is the expectation of this ministry that proponents of projects being carried out under the Transit Regulation should attempt to address or resolve any issues, concerns or formal comments raised during the transit project assessment process.

Prior to the issuance of the Notice of Completion, please provide a copy of any comments received by the MNR, the local conservation authority, the MHSTCI and any Indigenous communities as well as the final responses from these agencies/communities and your attempts to address any issues raised. As part of the ministry's review of the project, the ministry must be satisfied that there are no outstanding matters of provincial importance or Aboriginal or treaty right issues associated with the project.

We look forward to continuing to work with you on addressing our comments identified in the draft EPR. If you have any questions please feel free to contact Stephen Deneault, Project Officer at 437-247-3443 or by email at [Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca). Alternatively, you may also call me at 416-314-7225 or by email at [Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cindy Batista', with a horizontal line extending to the right from the end of the signature.

---

Cindy Batista  
Special Project Officer  
Environmental Assessment Branch  
Ministry of the Environment, Conservation and Parks

Attachments

**From:** Shukla, Shveta

**Sent:** February-08-21 4:03 PM

**To:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**Attachments:** Stage 2 ION - Air Quality Report\_MECP Comments Update Feb. 2021.pdf;  
S2ION - AQIA Appendix E - Model Figures.pdf; Stage 2 ION - Air Quality  
Comment Response Log\_MECP.PDF

Good Afternoon,

Thank you for your review and comments to the Stage 2 ION - Air Quality Report.

Enclosed is the updated redline version of the Air Quality Report along with our project team responses. Also, attached is Appendix E of this report as a OneDrive link, as this is a larger file. Please let us know if MECP plans to provide any further comments at this time, we would appreciate receiving any written comments by March 2, 2021.

Separately, we are also working on updating the Noise and Vibrations and Drainage and Stormwater Reports and will provide them for your review.

If you have any further questions, or have trouble accessing the OneDrive link, please feel free to reach out to myself or any of our project team members copied above.

Best Regards,  
Shveta



**Shveta Shukla**

Environmental Planner

T +1 289-835-2603

E [Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)

---

**From:** Shukla, Shveta  
**Sent:** February-23-21 4:22 PM  
**To:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>  
**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>  
**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

Hi Stephen,

Just checking in to see if you are on track for releasing any written comments that the MECP may have on the Noise and Vibration, Drainage and Stormwater, and Air Quality Reports for March 2<sup>nd</sup>, as previously discussed. Please feel free to pass on any comments or questions that you may have even prior to this date.

Also wanted to inform you that we are currently in the process of preparing the Information Gathering Form (IGF) and will be providing it to the MECP prior to issuing the Notice of Completion of the EPR on April 6, 2021. Please note that we don't intend to append the IGF form as part of the EPR document in case there are any further discussions around this. Do let me know if you have any questions or concerns with this approach.

Thank you,  
Shveta



**Shveta Shukla**  
Environmental Planner  
T +1 289-835-2603  
E [Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)

---

**From:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>  
**Sent:** February-11-21 1:58 PM  
**To:** Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>  
**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>  
**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

Thanks Shveta,

I was able to download all of the files.

MECP will review the responses provided and will follow up if we have any outstanding questions, keeping in mind your March 2<sup>nd</sup> date.

Keep in touch,

Stephen

**Stephen Deneault** | Project Evaluator  
Environmental Assessment Services | Environmental Assessment Branch  
**Ministry of the Environment, Conservation and Parks** | 135 St. Clair Avenue West, Toronto, ON  
M4V 1P5

☎: 437-247-3443 | ✉: [Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)



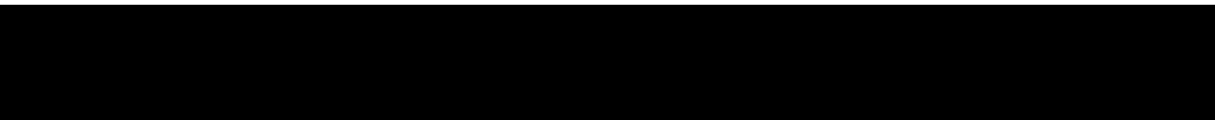
---

**From:** Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>  
**Sent:** February-11-21 12:28 PM  
**To:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>  
**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>  
**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hi Stephen,

Apologies for the inconvenience! I have added all the files to the OneDrive link below and added external users, this should work now.



Also, IT on our end recommended trying a different web browser for the WSP FTP link, sometimes Internet Explorer can be a little fussy. Please let me know if you have any issues accessing this time.

Thank you,  
Shveta



**Shveta Shukla**

Environmental Planner

T +1 289-835-2603

E [Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)

---

**From:** Deneault, Stephen (MECP) [<mailto:Stephen.Deneault@ontario.ca>]

**Sent:** February-11-21 10:34 AM

**To:** Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

Hi Shveta,

Thank you for the information. Unfortunately I cannot access the files from the onedrive or URL link, can you please send again? Error messages attached.

Thanks,  
Stephen

---

**From:** Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>

**Sent:** February-10-21 4:28 PM

**To:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Good Afternoon,

As previously mentioned, we have updated the Stage 2 ION Noise and Vibration and Drainage and Stormwater Reports to reflect comments provided by the MECP. For ease of file sharing, I have saved the files in a temporary WSP FTP site, please find login credentials below:

URL: [REDACTED]  
Username: [REDACTED]  
Password: [REDACTED]

The Air Quality Report has also been saved in this FTP link, in case there were any troubles accessing the OneDrive link previously sent. Once again, please let us know if MECP plans to provide any further comments at this time. We would appreciate receiving any written comments by March 2, 2021.

If you have any further questions, or have trouble accessing the files, please feel free to reach out to myself or any of our project team members copied above.

Best Regards,  
Shveta



**Shveta Shukla**  
Environmental Planner  
T +1 289-835-2603  
E [Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)

---

**From:** Shukla, Shveta

**Sent:** March-01-21 9:30 AM

**To:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>

**Cc:** Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**Attachments:** Stage 2 ION - Comment Log - MECP - GW.pdf

Hi Stephen,

Please find attached Project Team's responses to the ministry's soil and groundwater comments. In this table you will also find the response to comment #8 from the MECP Kitchener area office.

With regards to comment #11 from the MECP Kitchener area office, there are a total of 13 TPSS and the updated Noise and Vibration report identifies the locations of the TPSS's, also shown in Figure 1 – Overall Key Plan.

If you have any further questions, please reach out to myself or any of our project team members copied above.

Best Regards,  
Shveta



**Shveta Shukla**

Environmental Planner

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E [Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)

---

**From:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>

**Sent:** February-24-21 1:28 PM

**To:** Shukla, Shveta <[Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>

**Cc:** Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>;

Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

Hi Shveta & Sandy,

Thank you for your email. The ministry is gathering technical reviewer comments and we are on track to circulate those to you by March 2<sup>nd</sup>; however, I will let you know if this may change. Thank you for the update regarding the IG Form. We will let you know if there are any additional follow-up questions or clarifications with respect to the form.

Can the Region please provide an update on the following comments from the ministry's memo on the draft EPR (attached):

1. We have yet to receive a response to the ministry's soil and groundwater comments (attached). Please provide an update on how the Region has addressed, or plans to address the comments.
2. We have yet to receive responses to comments #8 and #11 from the MECP Kitchener area office. Please describe how the Region has addressed, or plans to address the comments.

Let me know if you have any questions about the above.

Thanks,  
Stephen

**Stephen Deneault** | Project Evaluator

Environmental Assessment Services | Environmental Assessment Branch

**Ministry of the Environment, Conservation and Parks** | 135 St. Clair Avenue West, Toronto, ON

M4V 1P5

☎: 437-247-3443 | ✉: [Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)



---

**From:** Shukla, Shveta

**Sent:** March-08-21 5:40 PM

**To:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>

**Cc:** Morneau, Denise <[Denise.Morneau@wsp.com](mailto:Denise.Morneau@wsp.com)>; Nairn, Sandy <[Sandy.Nairn@wsp.com](mailto:Sandy.Nairn@wsp.com)>; Malloy, Patrick <[Patrick.Malloy@wsp.com](mailto:Patrick.Malloy@wsp.com)>; Fisher, Jennifer <[Jennifer.Fisher@wsp.com](mailto:Jennifer.Fisher@wsp.com)>; Matthew O'Neil <[MONeil@regionofwaterloo.ca](mailto:MONeil@regionofwaterloo.ca)>; Batista, Cindy (MECP) <[Cindy.Batista@ontario.ca](mailto:Cindy.Batista@ontario.ca)>; Desautels, Solange (MECP) <[Solange.Desautels@ontario.ca](mailto:Solange.Desautels@ontario.ca)>

**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

**Attachments:** Stage 2 ION - Notice\_of\_Completion\_2021\_Final.pdf

Hi Stephen,

Thank you for providing the Ministry's comments to the revised reports. The Project Team has reviewed the comments related to the Noise/Vibration Report and would appreciate if the Ministry could accommodate a meeting this week to discuss some of the comments. Please let me know if any one of the two suggested times below work for the MECP:

- **Wednesday, March 10** – 2:30 pm - 3:30 pm
- **Friday, March 12** – 1:00 pm - 2:00 pm

In the meantime, please find our responses below in **red** to the revised Air Quality Report comments.

Also, a few additional minor edits were made to the Notice of Completion since the version that MECP reviewed earlier last week, so I have attached to this email for your information. If you have any further questions, please let myself or any of the Project Team members copied above know.

Thank you,  
Shveta



**Shveta Shukla**

Environmental Planner

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E [Shveta.Shukla@wsp.com](mailto:Shveta.Shukla@wsp.com)

---

**From:** Deneault, Stephen (MECP) <[Stephen.Deneault@ontario.ca](mailto:Stephen.Deneault@ontario.ca)>  
**Sent:** March-03-21 9:09 AM  
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**Subject:** RE: Stage 2 ION - Draft Environmental Project Report Review/Comments

Hi Shevta,

The ministry has reviewed the responses and documentation you provided on February 11<sup>th</sup> related to noise/vibration and air quality comments. Please find attached new MECP noise and vibration comments in the attached table for your attention. Provided in-text below are follow-up comments on the revised Air Quality Report:

1. The Ontario AAQC was updated on May 1, 2020 with the most updated version now available to the public. The 10min, 1hr, and annual SO<sub>2</sub> AAQC have been updated to 67ppb, 40ppb, and 4ppb, respectively. The annual PM<sub>2.5</sub> AAQC has been updated to 8.8 ug/m<sup>3</sup>. Please update Table 2-2 referencing the current AAQC (<https://files.ontario.ca/mecp-ambient-air-quality-criteria-list-en-2020-05-01.pdf>). **The SO<sub>2</sub> AAQC values have been updated to the 2020 limit, however the values are converted from ppb to ug/m<sup>3</sup>. The PM<sub>2.5</sub> AAQC limit of 8.8 ug/m<sup>3</sup> will be added to Table 2-2, and the table notes will be updated to reference the 2020 AAQC limits as well.**
2. Based on the most updated CAAQS, the NO<sub>2</sub> 1hr and annual CAAQS is 60ppb and 17ppb since 2020, and these values will be updated to 42ppb and 12ppb respectively in 2025. Also, the current SO<sub>2</sub> 1hr and annual CAAQS is 70 ug/m<sup>3</sup> and 5 ug/m<sup>3</sup>, which will be updated to 65ppb and 4ppb respectively in 2025. Please update Table 2-2 referencing the applicable CAAQS (<http://airquality-qualitedelair.ccme.ca/en/>). **The NO<sub>2</sub> and SO<sub>2</sub> CAAQS limits have been updated to the 2025 limits, however the values are converted from ppb to ug/m<sup>3</sup>. The table notes under Table 2-2 will be updated to reference the 2025 CAAQS limits and 2020 AAQC limits.**
3. The contour plots in Appendix E have not been provided so far. **Modelling contour figures for each scenario and study area are provided in Appendix E showing the most impacted areas. Can the MECP please clarify if they are looking for something different?**

Please address the ministry's comments and let us know if you have any questions or would like to schedule a meeting with the ministry to discuss.

Thank you,  
Stephen

**Stephen Deneault** | Project Evaluator

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