CONCESSION STREET BRIDGE EA
SCHEDULE B MUNICIPAL CLASS
ENVIRONMENTAL ASSESSMENT

Watermain Repair
Project File Report Revision

October 19, 2022

Prepared for:
Region of Waterloo

Prepared by:
Stantec Consulting Ltd.

Project Number:
165640316
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1 Introduction

1.1 Purpose, Need and Justification for the EA Revision

The Region of Waterloo (Region) retained Stantec Consulting Ltd. to complete a Schedule B Municipal Class Environmental Assessment (Class EA) Study to identify options for the rehabilitation of the watermain that extends from Water Street West, across the Concession Street Bridge, to Grand Avenue South.

Following an extended period of extreme temperatures (above and below normal temperatures) and rain in late January/early February 2018, snow within the Grand River watershed rapidly melted causing the water level in the Grand River to rise. The unusual weather caused an ice jam to form upstream of the Galt area, which suddenly released when temperatures rose, causing the highest water levels in the Galt area in several years. As a result, flowing chunks of ice and debris damaged the Concession Street Bridge Watermain (CSBWM), and segments of the watermain dropped into the Grand River (See Figure 1). The Region was able to isolate the watermain at both ends of the bridge; however, it was not possible to replace the missing segments of the watermain and return the watermain to service.

The Schedule B Class EA Study was completed in 2021. During the implementation phase of this project, it was determined that the construction costs were prohibitively higher than anticipated for trenchless construction methods in bedrock. As a result, the Region of Waterloo retained Stantec Consulting Ltd. to complete a revision to the 2021 Schedule B Class EA Study to review the preferred solution for the watermain connection. This Project File revision describes the changes to the project as planned in 2021 and provides an assessment of the potential environmental impacts and proposed mitigation requirements.

This document will be made available online for a 30-day public comment period.

1.2 Study Area

The study area consists of the area around the existing Concession Street bridge in Cambridge, Ontario, as shown in Figure 1. The study area for the EA Addendum remains unchanged from the 2021 EA. The existing watermain connection is a 600 mm diameter watermain extending from Water Street West across the Concession Street Bridge to Grand Avenue South. The length of the segment suspended from the bridge is approximately 90 m.
1.3 Review of Alternative Solutions

An evaluation of Alternative Solutions was completed as part of the 2021 EA study. The following alignments for the repair and/or replacement of the Concession Street Watermain were considered:

1. Reinstallation of the watermain on the Concession Street bridge:
   - 1A. Install in the same location (upstream side of the bridge)
   - 1B. Install on the downstream (south) side of the bridge

2. Installation of a new watermain under the Grand River using trenchless methods:
   - 2A. Horizontal Directional Drilling (HDD) north of the bridge
   - 2B. HDD south of the bridge
   - 2C. Microtunneling south of the bridge
Based on the evaluation, a trenchless watermain installation south of the Concession Street bridge (Option 2B) using HDD was selected as the preferred option, based on the following:

- Least risk of damage from ice/flooding and least impact to the bridge
- Manageable safety concerns – work is confined to specific work locations away from traffic and pedestrians
- Less maintenance – watermain is not exposed to weather and is protected underground over the long-term
- Fewer traffic impacts during construction relative to other alternatives
- Comparative construction cost relative to other alternatives
- Longer lifespan (50+ years) relative to installing the watermain on the bridge (<40 years)
- Low lifecycle cost – re-installing the watermain on the bridge has between a 1% and 2% chance of incurring damage on any given year based on flow levels and weather conditions, which increases repair/replacement costs

1.4 Revision to the Preferred Alternative Solution

Following the completion of the 2021 Class EA, detailed design and tendering, it was identified that construction costs were prohibitively higher than anticipated based on the HDD construction method. An HDD-constructed watermain has a longer lifespan (50+ years) relative to installing the watermain on the bridge (<40 years), however high construction costs make the HDD method cost-prohibitive. Re-installing the watermain on the bridge has between a 1% and 2% chance of incurring damage on any given year based on flow levels and weather conditions, which increases repair/replacement costs. All trenchless options (Options 2A, 2B, and 2C) are expected to have higher than anticipated costs and technical complexity associated with them. Non-trenchless options are more favourable as a result.

A review of the 2021 alternative solutions was conducted to determine whether the methodology and design could be revised to maximize infrastructure value investments while meeting the servicing needs and objectives.

A comparison of the “on bridge” options (1A and 1B) identified that Option 1B is preferred: “Reinstallation of the watermain on the Concession Street bridge - Install on the downstream (south) side of the bridge”. The option includes the following:

- The downstream side of the bridge presents the lowest risk of damage from ice/flooding based on the on-bridge options, and the least impact to the bridge
Concession Street Bridge EA Schedule B Municipal Class Environmental Assessment
Watermain Repair Project File Report Revision

- Manageable safety concerns – work can be confined to specific work locations away from traffic and pedestrians
- Although both bridge options would be exposed to the same weather over the long-term, the location of the downstream side avoids additional damage potential from ice/flooding
- Low traffic impacts during construction due to installation on the side of the bridge
- Lower construction cost compared to HDD drilling
- Reduces impacts to the natural environment by utilizing the Concession Street bridge

The previously preferred alternative from the 2021 Project File (orange line) and the Revised Preferred Alternative (blue line) are shown on Figure 2.
Figure 2: Comparison of Original and Revised Preferred Alternative
2 Municipal Class EA Process

All municipalities in Ontario are subject to the provisions of the Environmental Assessment Act (EA Act), which mandates the completion of an EA before constructing municipal infrastructure projects. The Ministry of the Environment, Conservation and Parks (MECP) is responsible for administration of the EA Act.

The Municipal Engineers Association (MEA) Municipal Class Environmental Assessment document (October 2000, as amended in 2007, 2011, & 2015) is an approved Class EA process that applies to municipal infrastructure projects including roads, water, and wastewater. This process provides a comprehensive planning approach to consider alternative solutions and evaluate their impacts on a set of criteria (e.g., transportation, environmental, social, engineering considerations) and determine mitigating measures to arrive at a preferred alternative for addressing the problem (or opportunity). The undertakings are considered pre-approved provided the mandatory environmental planning process as set out in the Class EA document is completed.

The MEA Class EA document provides a framework by which projects are classified as Schedule A, A+, B, or C based on a variety of factors including the general complexity of the project, level of investigation required, and the potential impacts on the natural, social, cultural, and economic environments that may occur. Due to the type of project, anticipation for potential effects, and estimated capital costs, the Concession Street Class EA was defined as a Schedule ‘B’ project.

Schedule B projects require the completion of Phases 1 and 2 of the Class EA planning process, which is documented in a Project File and submitted for a mandatory 30-day comment period. The process flowchart is provided in Figure 3.
2.1 Municipal Class EA Schedule B Revision Process

Section A.4.1.1. of the MEA Class EA document states that it may be necessary to revise Schedule B projects due to the environmental implications of changes to the project or due to a delay in implementation. Significant modifications to Schedule B projects, as presented to the public during the screening process and as set out in the Notice of Completion, shall be reviewed by the proponent. The reviews shall be documented in the Project File and the proponent (the Region) shall issue a Revised Notice of Completion to all potentially affected members of the public and review agencies.

A period of 30 calendar days following the issuance of the Revised Notice of Completion shall be allowed for review and response by affected parties, during which time no work is to be undertaken.

Any outstanding issues or concerns with this project that are identified during the 30-day comment period are to be addressed by the Region. In the event that there are
outstanding concerns following discussions with the Region, a request may be made to the Minister of the Environment, Conservation and Parks under Section 16 of the Environmental Assessment Act requiring a higher level of study (i.e., requiring an individual/comprehensive EA approval before being able to proceed), or that conditions be imposed (e.g., require further studies), only on the grounds that the requested order may prevent, mitigate or remedy adverse impacts on constitutionally protected Aboriginal and treaty rights. Requests on other grounds will not be considered. Requests should include the requester contact information and full name for the ministry.

3 Existing Conditions Update

3.1 Natural Environment

Please refer to the existing natural environment conditions summarized in Section 5.2 of the 2021 Project File Report. All proposed construction work associated with the refined solution is located within the existing study area. No changes to the existing natural environment have occurred since the completion of the Project File Report.

3.2 Socio-Economic Environment

Please refer to the existing socio-economic environment conditions summarized in Section 5.3 of the 2021 Project File Report. A site visit was conducted by the project team on June 6, 2020 during the Class EA Study. No changes to the existing socio-economic environment have occurred since the completion of the Project File Report.

3.3 Cultural Environment

3.3.1 BUILT HERITAGE RESOURCES

A Cultural Heritage Assessment Report was completed during the 2021 Schedule B Class EA which included a review of several alternatives including the reinstallation of the watermain on the bridge or installation of the watermain under the Grand River using trenchless methods. Fourteen cultural heritage resources were identified as assessed for potential impacts resulting from the project within the Study Area. Resources included former industrial properties, residential properties, commercial properties, and the Grand River. Two Cultural Heritage Resources (CHR), a residence and former industrial building, are located within 50 m of the proposed alternative for watermain replacement, as shown on Figure 4.
3.3.2 **ARCHAEOLOGICAL RESOURCES**

A Stage 1 Archaeological Assessment was completed for the study area and concluded that the study area does not retain archaeological potential. There is no additional area requiring Stage 1 Archaeological Assessment based on the revision proposed. The Stage 1 report was submitted to the MHSTCI on November 23, 2020 and has been since entered into the register of archaeological reports. A copy of the Stage 1 Archaeological Assessment is available with the 2021 Project File Report.

3.3.3 **MARINE ARCHAEOLOGICAL ASSESSMENT**

A marine archaeological assessment of the Grand River in the area of the Concession Street bridge was completed under the 2021 Schedule B Class EA. It was determined that the study area has low archaeological potential for any marine related archaeological resources, either prehistoric, Indigenous historic or Euro-Canadian historic, and there are no archaeological concerns for this specific area of the Grand River. There is no additional area requiring marine archaeological assessment based on the revision proposed. A copy of the marine archaeological assessment report is available with the 2021 Project File Report.
4   Consultation

This section provides a summary of the project consultation and communications.

4.1   Project Contact List

A project contact list was developed as part of the 2021 Class EA which includes government agencies and officials, local stakeholder groups, Indigenous communities, utility companies, and others who have expressed their interest in the study. The contact list was updated as required for the Project File Revision process and is provided in Appendix A.

4.2   Project Notices

The Notice of Project File Revision was sent to the project contact list, published on the Region’s website at www.regionofwaterloo.ca/water, and sent to those people who expressed an interest in this project throughout the duration of the study. A copy of the notice is provided in Appendix A.

Additional consultation with the area residents/businesses potentially impacted by the revised project will be conducted during the design phase to review project information and traffic staging, as required.

4.3   Indigenous Community Engagement

During the 2021 Class EA Study, potentially interested Indigenous communities and First Nations to be consulted as part of the study were identified, including:

- Six Nations of the Grand River Territory
- Six Nations Haudenosaunee Confederacy Council
- Mississaugas of the Credit First Nation

The first point of contact for this project was the Notice of Study Commencement, which was sent via email to the above communities on October 28, 2020. All public material was forwarded to the above communities, and follow-up phone calls/emails were completed to ensure that communities had sufficient information to determine consultation interests. All interested parties were notified and invited to the PCC and given the opportunity to express concerns and provide feedback through an invitation to meet and via telephone calls soliciting discussion.

A letter dated October 21, 2020 was received via email from Mississaugas of the Credit First Nation (MCFN) requesting information about the project history and information
about associated environmental and archaeological fieldwork. The letter highlighted the community’s interest in participation of Field Liaison Representatives in all environmental and archaeological fieldwork within the MCFN treaty territory, including Stage 2 through 4. A response was sent from ARA Archaeology indicating that the Stage 1 site visit was conducted on October 6, 2020 under PIF #P007-1151-2020.

No environmental or archaeological fieldwork was completed during this revision process. As a result, no Field Liaison Representatives were required. A copy of the Revised Notice of Completion was sent to Indigenous communities with a covering letter explaining no additional field work was completed.

5 Impacts and Mitigation Measures for the Revised Preferred Solution

5.1 Natural Environment

The revised preferred solution results in less impact to vegetation and habitat since all work will be conducted along the existing Concession Street bridge or within the existing municipal right-of-way rather than using trenchless methods outside of established right-of-way corridors.

The summary of permits and approvals required for the project has been revised and is provided below:

- If in-water work is required, consultation with Department of Fisheries and Oceans (DFO) will be required with respect to the federal *Species at Risk Act* (SARA) and the presence of Silver Shiner and Black Redhorse in the vicinity of the bridge. Both species are considered threatened federally and a permit under SARA would be required for in-water work. A SARA permit would not be required for Wavy-rayed Lampmussel as it is ranked as Special Concern federally.

- Silver Shiner, Black Redhorse and Wavy-rayed Lampmussel are all listed as threatened species under the provincial *Endangered Species Act* (ESA). Should in-water work be required, a permit from MECP would be required.

- Depending on the location of bank disturbance related to installation of the watermain, staging areas, etc., a permit under the ESA may be required given the presence of Silver Shiner. The habitat protections related to Silver Shiner under the ESA include the floodplain or riparian habitat adjacent to the occupied reach. If work is located within the floodplain, MECP should be consulted to determine if a permit is required. The floodplain in the area of the Concession Street bridge is quite wide and encompasses built-up areas and streetscapes;
therefore, consultation with MECP is required to determine the practicality of including all of the floodplain area as Silver Shiner secondary habitat.

- No terrestrial SAR were identified during the rehabilitation assessment for the bridge. Prior to construction any areas that require tree removals to accommodate construction should be examined to determine if nesting birds are present. The proposed crossing approach will utilize the existing bridge. Where disturbance to the bridge is required (i.e., removal of the existing watermain pipe), the bridge should be examined for any nesting birds and appropriate permitting approaches can be prescribed.

- The Study Area is located within the Grand River Conservation Authority (GRCA) Regulatory Area, as well as the GRCA Floodplain and GRCA Special Policy Area. To ensure that regulatory policies associated with these areas are complied within, the Region will continuously consult GRCA throughout the timeline of this project. Permits may be required in relation to Ontario Regulation 150/06: Regulation of Development, Interference, with Wetlands and Alterations to Shorelines and Watercourses, and should be confirmed with GRCA during the design phase.

5.2 Built Heritage Resources

Although the proposed watermain will not result in a change in land use of properties in the study area, potential for vibrations resulting from the construction activity could affect heritage structures on properties located within 50 metres of the revised preferred alternative. Therefore, a building conditions specialist or geotechnical engineer should be consulted to identify appropriate vibration mitigation measures.

5.3 Traffic Impacts during Construction

Construction staging and traffic management will be confirmed during the design phase. Construction has the potential to temporarily impact emergency service vehicles in the area. It is recommended that advanced notice of construction be provided to emergency service providers if road closures/detours are required.

5.4 Noise

Construction noise impacts are anticipated but will be temporary in nature and are largely unavoidable. With adequate controls, impacts can be minimized; however, for some periods of time and types of work, construction noise will likely be noticeable. Impacts and suitable mitigation measures will be confirmed during the design phase.
5.5 Utilities

Through the detailed design process of Option 2B (previously preferred alternative), it was determined that the connection to the existing 450 mm watermain south of the bridge was not feasible given the location of existing utilities on Grand Avenue South. With the watermain installed on the downstream side of the Concession Street Bridge, a modified connection location to the existing 600 mm watermain on Cedar Street was developed resulting in less impact to existing utilities and adjacent infrastructure compared to the Grand Avenue South connection location.

Due to the change in the preferred alternative and the potential impacts to utilities crossing the Concession Street bridge, the following utilities were contacted to provide an update and opportunity to comment on the Project File revision:

- Bell
- Enbridge
- Rogers

The Revised Notice of Completion was sent to each utility with a covering letter explaining the planned design and construction approach. A copy of the letter is provided in Appendix A. Additional consultation with utilities potentially impacted by the revised project will be conducted during the design phase, as required.

6 Next Steps

If no concerns are expressed by the conclusion of the 30-day review period, the Region may proceed with the design of the project. The Region anticipates subsequent public consultation throughout the design and construction phases of the project. The project is expected to proceed as follows:

- Revised Notice of Completion – Summer 2022
- Design and Tendering of Construction Contract - 2022
- Construction (Anticipated) - 2023
APPENDIX A:
NOTIFICATION MATERIALS
Revised Notice of Completion
Concession Street Bridge Watermain Repair
Schedule B Municipal Class Environmental Assessment

The Region of Waterloo (Region) completed a Municipal Class Environmental Assessment (EA) Study in 2021 to consider options for the rehabilitation of the watermain that extends from Water Street West, across the Concession Street Bridge, to Grand Avenue South. In the winter of 2018, a period of extreme temperatures led to an ice jam, resulting in ice and debris that caused damage to the watermain on the Bridge.

The Schedule B Class EA Study was completed in 2021. During the implementation phase of this project, it was determined that the construction costs were prohibitively higher than anticipated for trenchless construction methods in bedrock. As a result, the Region retained Stantec Consulting Ltd. to complete a revision to the 2021 Schedule B Class EA Study to review the preferred solution for the watermain connection. The Project File revision describes the changes to the project as planned in 2021 and provides an assessment of the potential environmental impacts and proposed mitigation requirements.

The Project File revision is available online for a 30-day comment period on the Region’s website (https://www.regionofwaterloo.ca/en/living-here/current-projects.aspx), from October 19, 2022 to November 28, 2022.

The Class EA Study was completed in accordance with the planning and design process for Schedule B projects, as outlined in the Municipal Class EA document (October 2000, as amended), which is an approved process under the Ontario EA Act.

Interested persons may provide written comments to our project team by November 28, 2022. All comments and concerns should be emailed directly to Kevin Dolishny, P.Eng. Senior Engineer Water Services, Region of Waterloo at kdolishny@regionofwaterloo.ca, or by telephone at 519-575-4400, ext. 3862.

In the event that there are outstanding concerns following discussions with the Region, a request may be made to the Ministry of the Environment, Conservation and Parks under Section 16 of the Environmental Assessment Act requiring a higher level of study (i.e., requiring an individual/comprehensive EA approval before being able to proceed), or that conditions be imposed (e.g., require further studies), only on the grounds that the requested order may prevent, mitigate, or remedy adverse impacts on constitutionally protected Aboriginal and treaty rights. Requests on other grounds will not be considered. Requests should include the requester contact information and full name for the ministry.

The request should be sent in writing or by email to:

Minister of the Environment, Conservation and Parks
Ministry of Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto ON M7A 2J3
minister.mecp@ontario.ca

and
Requests should also be sent to the Region of Waterloo.

This Notice issued October 19, 2022.

Information will be collected in accordance with the Municipal Freedom of Information and Protection of Privacy Act. With the exception of personal information, all comments will become part of the public record.
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</tbody>
</table>
October 19, 2022
Project/File: 165640316

Attention: Utility contact, Title
Address

Reference: Concession Street Bridge
Municipal Class Environmental Assessment
Revised Notice of Completion

Dear Sir / Madam,

The Region of Waterloo (Region) retained Stantec Consulting Ltd. to complete a Schedule B Municipal Class Environmental Assessment (Class EA) Study to identify options for the rehabilitation of the watermain that extends from Water Street West, across the Concession Street Bridge, to Grand Avenue South (See the Notice and Map attached). In the winter of 2018, a period of extreme temperatures led to an ice jam, resulting in ice and debris that caused damage to the watermain on the Bridge.

The Schedule B Class EA Study was completed in 2021. During the implementation phase of this project, it was determined that the construction costs were prohibitively higher than anticipated for trenchless construction methods in bedrock. It was also determined that the previously preferred alternative connection to the existing 450 mm watermain south of the bridge was not feasible given the location of utilities on Grand Avenue South. A Project File revision has been prepared to describe the changes to the project as planned in 2021 and provides an assessment of the potential environmental impacts and proposed mitigation requirements.

The revised preferred alternative includes installing a watermain on the downstream side of the Concession Street Bridge. With the watermain installed on the downstream side of the Concession Street Bridge, a modified connection location to the existing 600 mm watermain on Cedar Street was developed resulting in less impact to existing utilities and adjacent infrastructure compared to the Grand Avenue South connection location.

Additional consultation with utilities potentially impacted by the revised project will be conducted during the design phase, as required.
The Project File revision is available online for a 30-day comment period on the Region’s website (https://www.regionofwaterloo.ca/en/living-here/current-projects.aspx), from October 19, 2022 to November 28, 2022.

Should you have any questions or comments regarding this Project File revision, please do not hesitate to contact the undersigned.

Regards,

STANTEC CONSULTING LTD.

Al Mueller  
Project Manager  
Phone: 519 577-7389  
Al.mueller@stantec.com

Attachment: Revised Notice of Completion

CC: Padraig Keating, Region of Waterloo  
Kevin Dolishny, Region of Waterloo  
Paula Hohner, Stantec Consulting Ltd.