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**Appendix J**

**MINISTRY OF CITIZENSHIP AND  
MULTICULTURALISM POST NOTICE OF  
COMPLETION CORRESPONDENCE**

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From: Jonathan Rudyk  
Sent: August 15, 2023 10:39 AM  
To: Harvey, Joseph (MCM)  
Cc: Kirk Worounig; Kaoru Yajima; Barboza, Karla (MCM)  
Subject: RE: R194591-20230510-New Dundee - Notice of Study Completion

Hi Joseph,

Thank you for meeting with us last week to discuss the MCM's comments on the New Dundee Class EA ESR. As discussed in our meeting, the comments you had noted in your letter dated June 9, 2023 will be addressed at the next stage of the project (preliminary and detailed design in 2028) via a Heritage Impact Assessment and includes having the documents reviewed by the Township and Regional Heritage committees. Your comments will also be noted in the Class EA Comments Log, and a new appendix will be added which includes this communication and the MCM's letter. We will send you a copy of this revised ESR for your review before we re-upload the reporting to the Region's webpage. Please let us know if you have any further questions or comments.

Thanks,

**Jonathan Rudyk, P.Eng** (he/him)

Associate, Process Engineer

 R.V. Anderson Associates Limited  
2001 Sheppard Avenue East, Suite 300, Toronto ON M2J 4Z8  
t 416 497 8600 ext. 1497 | m 416-802-5048  
[LinkedIn](#) | [Facebook](#) | [Website](#)



**SUMMER HOURS NOTICE:** RVA offices will be closed each Friday from June 2<sup>nd</sup> to September 8<sup>th</sup> as we celebrate the summer season. We will be available for project and construction related matters. For urgent requests, please contact mobile where provided.

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From: Kirk Worounig <[kworounig@RVAnderson.com](mailto:kworounig@RVAnderson.com)>  
Sent: Monday, June 12, 2023 8:58 AM  
To: Jonathan Rudyk <[JRudyk@rvanderson.com](mailto:JRudyk@rvanderson.com)>  
Subject: FW: R194591-20230510-New Dundee - Notice of Study Completion

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From: Harvey, Joseph (MCM) <[Joseph.Harvey@ontario.ca](mailto:Joseph.Harvey@ontario.ca)>  
Sent: Friday, June 9, 2023 11:52 AM  
To: Kirk Worounig <[kworounig@RVAnderson.com](mailto:kworounig@RVAnderson.com)>  
Cc: Barboza, Karla (MCM) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>; Badali, Mark (MECP) <[Mark.Badali1@ontario.ca](mailto:Mark.Badali1@ontario.ca)>; Kaoru Yajima <[KYajima@regionofwaterloo.ca](mailto:KYajima@regionofwaterloo.ca)>; Carol Derrick <[cderrick@rvanderson.com](mailto:cderrick@rvanderson.com)>  
Subject: FW: R194591-20230510-New Dundee - Notice of Study Completion

**[CAUTION EXTERNAL EMAIL]** Make Sure that it is legitimate before Replying or Clicking on any links

Kirk Worounig,

Please find attached our comments on the final ESR prepared for the above referenced undertaking.

Please note that the responsibility for administration of the *Ontario Heritage Act* and matters related to cultural heritage have been transferred from the Ministry of Tourism, Culture and Sport (MTCS) to the Ministry of Citizenship and Multiculturalism (MCM). Individual staff roles and contact information remain unchanged. Please continue to send any notices, report and/or documentation to both Karla Barboza and myself.

Please do not hesitate to contact me with any questions or concerns.

Regards,

**Joseph Harvey | Heritage Planner**

Citizenship, Inclusion and Heritage Division | Heritage Branch | Heritage Planning Unit

Ministry of Citizenship and Multiculturalism

613.242.3743

[Joseph.Harvey@ontario.ca](mailto:Joseph.Harvey@ontario.ca)

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From: Carol Derrick <[cderrick@rvanderson.com](mailto:cderrick@rvanderson.com)>  
Sent: May 10, 2023 9:24 AM  
To: Harvey, Joseph (MCM) <[Joseph.Harvey@ontario.ca](mailto:Joseph.Harvey@ontario.ca)>  
Subject: R194591-20230510-New Dundee - Notice of Study Completion

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

Please see attached the Notice of Study Completion for the New Dundee Water Supply System – Iron and Manganese Treatment Upgrades Municipal Class Environmental Assessment (Class EA).

The Regional Municipality of Waterloo undertook this Class EA to identify a preferred approach for iron and manganese treatment. The Study reviewed and provided recommendations related to iron and manganese treatment upgrades based on current industry standards and new technologies, as well as the location of potential upgrades.

If you would like more information about the New Dundee Water Supply System – Iron and Manganese Treatment Upgrades, please contact the undersigned.

**Kaoru Yajima, P.Eng.**  
Sr. Engineer, Water Services  
Region of Waterloo  
150 Frederick Street, 7<sup>th</sup> Floor  
Kitchener, ON N2G 4J3

Phone: 519-575-4757 ext. 3349  
Email: [kyajima@regionofwaterloo.ca](mailto:kyajima@regionofwaterloo.ca)

**Kirk Worounig, P.Eng., PMP**  
Consultant Project Manager  
R.V. Anderson Associates Limited  
2001 Sheppard Avenue East, Suite 300  
Toronto, ON M2J 4Z8

Phone: 416-497-8600 ext. 1246  
Email: [kworounig@rvanderson.com](mailto:kworounig@rvanderson.com)

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**Ministry of Citizenship  
and Multiculturalism**

Heritage Planning Unit  
Heritage Branch  
Citizenship, Inclusion and  
Heritage Division  
5th Flr, 400 University Ave  
Tel.: 613.242.3743

**Ministère des Affaires civiques  
et du Multiculturalisme**

Unité de la planification relative au  
patrimoine  
Direction du patrimoine  
Division des affaires civiques, de  
l'inclusion et du patrimoine  
Tél.: 613.242.3743



June 9, 2023

EMAIL ONLY

Kirk Worounig, P.Eng., PMP  
Project Manager  
Region of Waterloo R.V. Anderson Associates Limited

**MCM File : 0012287**  
**Proponent : Region of Waterloo**  
**Subject : Municipal Class EA – Schedule C – Notice of Completion**  
**Project : New Dundee Water Supply System – Iron and Manganese Upgrades**  
**Location : Community of New Dundee, Township of Wilmot, Region of Waterloo**

Dear Kirk Worounig:

Thank you for providing the Ministry of Citizenship and Multiculturalism (MCM) with the Notice of Completion and Environmental Study Report (ESR) (dated March 23, 2023 and prepared by R.V. Anderson Associates Ltd.) in support of the Environmental Assessment (EA) Study for the New Dundee Water Supply System – Iron and Manganese Upgrades.

**Project Summary**

The Region of Waterloo has completed a Municipal Class Environmental Assessment (EA) Study for iron and manganese treatment upgrades for the New Dundee Water Supply System. The New Dundee Water Supply System is located at 156 Alderview Road in the Town of New Dundee, in the Township of Wilmot. The Study reviewed and provided recommendations related to iron and manganese treatment upgrades based on current industry standards and new technologies, as well as the location of potential upgrades. This study was undertaken as a Schedule 'C' project in accordance with the requirements of the Municipal Class Environmental Assessment (October 2000, as amended in 2007, 2011 and 2015), which is an approved process under the *Ontario Environmental Assessment Act*.

**Project Comments**

We previously provided comments on a draft version of the ESR (dated October 12, 2022) and note that many of our concerns were addressed in the final ESR. However, we have following observations (see also attached table (table 1) with more detailed comments):

- Archaeological Assessment – A Stage 1 archaeological assessment (AA) and report (under Project Information Form (PIF) P1059-0066-2020 and included in Appendix H), has been entered into the Ontario Public Register of Archaeological Reports recommending Stage 2 AA for portions of the study area.

Please note 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.

We recommend that a Stage 2 archaeological assessment and any further recommended assessment (e.g., Stage 3 and 4) be completed as early as possible in the detailed design phase and prior to any ground disturbing activities.

Approval authorities (such as the municipality or the Ministry of the Environment, Conservation and Parks - MECP) typically wait to receive the ministry's review letter for an archaeological assessment report before issuing a decision on the application as it can be used, for example, to document that due diligence has been undertaken

- Cultural Heritage Evaluation Report (CHER) (dated November 2022 and prepared by Parslow Heritage Consultancy Inc., ESR Appendix I) – Our previous comments on the draft CHER have not been sufficiently addressed. Please see our suggested revisions in the attached table below (table 2).

Thank you for providing us with the opportunity to review the ESR. We would be happy to set up a meeting to discuss further if you wish.

Sincerely,

Joseph Harvey  
Heritage Planner  
Heritage Planning Unit  
[joseph.harvey@Ontario.ca](mailto:joseph.harvey@Ontario.ca)

Copied to: Mark Badali, Environmental Resource Planner & EA Coordinator, MECP  
Carol Derick, R.V. Anderson Associates Ltd.  
Frank Fei Feng, R.V. Anderson Associates Ltd.  
Kaoru Yajima, Region of Waterloo

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. The Ministry of Citizenship and Multiculturalism (MCM) 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 MCM 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.

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

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

Table 1 - Appendix I - Cultural Heritage Evaluation Report (CHER) dated November 2022 and prepared by Parslow Heritage Consultancy Inc.				
Item	Document Section	MCM Comments/Recommendations on the Draft CHER (November 8, 2022)	RVA's Response (February 8, 2023)	MCM Comments on the Revised CHER (June 2023)
1.	3. (Introduction) p. 4	In addition to the information currently provided, this section should be revised to include a brief overview of how and what research was undertaken and who was engaged and/or consulted in the process.	Additional verbiage has been added to Section 3 to address this comment.	Acknowledged. A comprehensive research methodology involves a review of documentary, physical and oral evidence. At a minimum, this CHER shall be submitted to the Region of Waterloo Heritage Planning Advisory Committee and the Heritage Wilmot Advisory Committee for review and comment. Any feedback received needs to be incorporated into the CHER.  A CHER is required to describe the existing conditions for the cultural environment in the ESR.
2.	4 (Legislation and Policy Context) p. 8-10	The <i>Ontario Heritage Act</i> (OHA) is the primary legislation establishing a framework for policies and programs to conserve Ontario's heritage, but other acts, regulations and policies governing land use planning and resource development support heritage conservation. These include: <ul style="list-style-type: none"> <li>○ The <i>Planning Act</i>, which states that the "conservation of features of significant architectural, cultural, historical, archaeological or scientific interest" (cultural heritage resources) is a "matter of provincial interest".</li> <li>○ The Provincial Policy Statement, issued under the Planning Act, links heritage conservation to long-term economic prosperity and requires municipalities and the Crown to conserve significant cultural heritage resources.</li> <li>○ The <i>Environmental Assessment Act</i>, which defines "environment" to include cultural conditions that influence the life of humans or a community. Cultural</li> </ul>	Section 4.3 has been revised accordingly.	Partially resolved.  The definition of 'conserved' was revised to align with the current definition in the Provincial Policy Statement. However, this section continues to use the definitions included in the MCEA manual and is missing a reference to the <i>Environmental Assessment Act</i> .

Table 1 - Appendix I - Cultural Heritage Evaluation Report (CHER) dated November 2022 and prepared by Parslow Heritage Consultancy Inc.				
Item	Document Section	MCM Comments/Recommendations on the Draft CHER (November 8, 2022)	RVA's Response (February 8, 2023)	MCM Comments on the Revised CHER (June 2023)
		<p>heritage resources are important components of those cultural conditions.</p> <p>Please note that the definitions from the PPS 2020 take precedence over the MCEA Manual. Under the PPS the term "conservation" includes the identification, <b>protection</b>, management and use of built heritage resources, cultural heritage landscapes and archaeological resources in a manner that ensures their cultural heritage value or interest is retained. To align with PPS terminology paragraph 3 in section 4.3 should be revised in the following manner:</p> <p>"Section 2.6 of the PPS addresses the <del>protection and</del> conservation of cultural heritage and archaeological resources ..."</p>		
3.	8.1 (Cultural Heritage Value or Interest)  p. 31-32	<p>This should describe how the criteria, O. Reg. 9/06 (<i>Ontario Heritage Act</i>), was applied to determine the property's cultural heritage value and level of significance, if any. It should present a rationale supporting why each criterion was met or not met, and list the attributes that support or contribute to the property's cultural heritage value or interest, if any. We recommend that the third column comments in Table 2 be revised to expand on the rationale or justification.</p> <p>Additional information will be required to determine the proposed alterations impact on the CHVI of the property. We recommend a Heritage Impact Assessment (HIA), prepared by a qualified consultant, be completed to assess potential project impacts. At a minimum we recommend including graphics to support the conclusion that the project will not impact on the property at 328 Main Street in Appendix B.</p>	<p>Table 2 Column 3 has been expanded upon to address this comment.</p> <p>A Heritage Impact Assessment (HIA) will be undertaken by a qualified consultant during the detailed design phase of the project, as the Class EA only conceptually establishes the façade and the general footprint of the building. Appendix B has the approximate site plan for the preferred alternative, Layout No. 2.</p>	<p>Partially resolved.</p> <p>The evaluation of CHVI included in Table 2 has been updated. The revisions made are consistent with our comments on the draft CHER and our email, dated February 22, 2023.</p> <p>Please note that Section 8 and the evaluation of cultural heritage value or interest included in Table 2 may need to be updated to incorporate the results of consultation with the Region of Waterloo Heritage Planning Advisory Committee and the Heritage Wilmot Advisory Committee.</p>

Table 1 - Appendix I - Cultural Heritage Evaluation Report (CHER) dated November 2022 and prepared by Parslow Heritage Consultancy Inc.				
Item	Document Section	MCM Comments/Recommendations on the Draft CHER (November 8, 2022)	RVA's Response (February 8, 2023)	MCM Comments on the Revised CHER (June 2023)
4.	Draft Statement of Cultural Heritage Value  NEW Section (Now section 9)  p. 33	<p>A draft statement of cultural heritage value or interest (SCHVI) needs to be included. Please see guidance below:</p> <ul style="list-style-type: none"> <li>• Draft Statement of Cultural Heritage Value – A Statement of Cultural Heritage Value will be prepared when a property is determined to be of cultural heritage value or interest and will include: <ul style="list-style-type: none"> <li>○ Description of Property - briefly describes the property location so that the property can be readily ascertained. It includes the location of the property, the principal resources that form the property and any discernible boundaries.</li> <li>○ Cultural Heritage Value or Interest – describes why the property is of cultural heritage value, explaining cultural meanings, associations, and connections the property holds for the community. It should reflect one or more of the criteria prescribed from Ontario Regulation 9/06.</li> <li>○ Description of Heritage Attributes- a list of key attributes or elements that must be retained to conserve the cultural heritage value or interest. Please refer to the <a href="#">Ontario Heritage Tool Kit: Designating Heritage Properties Guide</a> for guidance on how to draft Statements of Cultural Heritage Value.</li> </ul> </li> </ul> <p>Other information should be included in an Appendix, if relevant, otherwise it should be deleted from the report.</p>	Section 9 Draft Statement of Cultural Heritage Value has been added to the CHER.	<p>The draft Statement of Cultural Heritage Value or Interest (SCHVI) included in section 9 of the revised CHER should be updated to reflect the cultural heritage value of the property.</p> <p>The properties' cultural heritage value is based on its historical and associative value as well as its contextual value, however the draft SCHVI appears to focus on the properties potential physical or design value. Please revise as appropriate.</p>



Table 1 - Appendix I - Cultural Heritage Evaluation Report (CHER) dated November 2022 and prepared by Parslow Heritage Consultancy Inc.				
Item	Document Section	MCM Comments/Recommendations on the Draft CHER (November 8, 2022)	RVA's Response (February 8, 2023)	MCM Comments on the Revised CHER (June 2023)
5.	Community Engagement (New Section now included as Section 10)  p. 34	A new section providing an overview of the community engagement undertaken for this study should be included prior to the evaluation of cultural heritage value or interest. This section should outline what, when and how community input was undertaken as part of the research methodology for the property. It should also outline the process used to determine the outcomes of the community input exercise(s) and describe the results. The draft CHER should be sent to local heritage organizations, such as the Region of Waterloo Heritage Planning Advisory Committee for review and comment. Other heritage stakeholders may also have an interest in reviewing this draft report and it is not clear if they have been identified	Section 10 Community Engagement has been added to the CHER to address this comment, and the report will be circulated to the parties during the filing.	The CHER needs to be sent to Region of Waterloo Heritage Planning Advisory Committee and the Heritage Wilmot Advisory Committee before the notice of completion is finalized. This section needs to be updated to include their responses and the ESR shall include the updated CHER.

Table 2 - Environmental Study Report (ESR) dated March 23, 2023 and prepared by R.V. Anderson Associates Ltd.)				
Item	Document Section	MCM Comments on the Draft ESR (November 8)	RVA's Response (February 8, 2023)	MCM Comments on the final ESR (June 2023)
1.	1.4.2  p. 10	Sections 1.4.2 and 1.4.3 address the cultural heritage environment. We recommend the following revisions to align these ESR sections with current legislation and terminology.  ...  <del>1.4.3 (Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes (Parslow Heritage Consultancy Inc., April 2022))</del> <b>1.4.2.2 Built Heritage Resources and Cultural Heritage Landscapes</b>  A Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscape was completed in April 2022 and documented by Parslow Heritage Consultancy Inc., a cultural heritage consultant retained by RVA. <del>The checklist was completed as part of the Class EA process, and is</del>	These comments have been noted and addressed as follows: <ul style="list-style-type: none"> <li>Section 1.4.2 has been revised accordingly.</li> <li>Section 1.4.2.1 has been revised accordingly.</li> <li>Section 1.4.2.2 has been revised accordingly, with the exception of the HIA verbiage. An HIA will be completed at the detailed design stage,</li> </ul>	We recommend that Section 1.4.3 be revised to include the name of the Ministry's screening checklist - <a href="#">Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes</a> .  Please see comments above. We may have additional comments on how cultural heritage due diligence for built heritage resources and cultural heritage landscapes has been addressed once the CHER has been updated.

Table 2 - Environmental Study Report (ESR) dated March 23, 2023 and prepared by R.V. Anderson Associates Ltd.)				
Item	Document Section	MCM Comments on the Draft ESR (November 8)	RVA's Response (February 8, 2023)	MCM Comments on the final ESR (June 2023)
		<p><del>required to be submitted for MHSTCI prior to the completion of the EA. The checklist was used to screen for known and potential cultural heritage resources, along with other considerations such as Indigenous Land use. The study area for the checklist included the New Dundee Water Supply Facility (current location and proposed building) and all properties immediately adjacent to the facility. The complete checklist is included in Appendix I. The checklist found no known cultural heritage resources or any special association with a historic event within the study area. The study area is also not considered a landmark or cultural landscape for the Indigenous communities. However, The checklist identified 328 Main St as a property with potential cultural heritage value or interest (CHVI) and recommended a Cultural Heritage Evaluation Report for this property during the Class EA phase, if there are any changes in this area.</del></p> <p><u>A Cultural Heritage Evaluation Report (CHER) (dated July 2022 and prepared by Parslow Heritage Consultancy Inc.) (See appendix I) determined the property to be of CHVI. A Heritage Impact Assessment (HIA) (dated x and prepared by X) was undertaken to identify potential impacts to the property's CHVI (see Appendix X).</u></p> <p>MCM may have additional comments on how cultural heritage due diligence for built heritage resources and cultural heritage landscapes has been addressed once it has reviewed the updated CHER and HIA.</p>	<p>as previously mentioned in Table 1 comment 7 of this response letter.</p>	<p>See also comment 3 of Table 1 above relating to the completion of an HIA during detailed design.</p>

<b>Table 2 - Environmental Study Report (ESR) dated March 23, 2023 and prepared by R.V. Anderson Associates Ltd.)</b>				
<b>Item</b>	<b>Document Section</b>	<b>MCM Comments on the Draft ESR (November 8)</b>	<b>RVA's Response (February 8, 2023)</b>	<b>MCM Comments on the final ESR (June 2023)</b>
2.	7.0 (Mitigation Measures)  p. 79	<p>We recommend revising section 7 to the following:</p> <p><u>Built heritage Resources and Cultural Heritage Landscape Resources Impacts</u></p> <p><del>Cultural Heritage resources were identified at the property adjacent to the existing site (more details included in Section 4.3.4). Recommendations have been provided in that Section which will be adhered to, and no further work is recommended for the area.</del></p> <p>[Include the recommendations of the Heritage Impact Assessment – just copy and paste, don't summarize]</p>	<p>Noted. The recommended revisions have been captured in the final ESR, with the exception of "Local First Nations should also be contacted prior to the work occurring, to confirm their involvement of the report or field investigations."</p> <p>A Heritage Impact Assessment (HIA) will be undertaken by a qualified consultant during the detailed design phase of the project, as the EA will only conceptually establish the façade and the general footprint.</p>	<p>Please note that the reference to ESR section 4.3.4 is incorrect. The text should be revised to reference ESR section 4.3.3 which includes the recommendations of the CHER.</p> <p>Please see comments above. We may have additional comments on this section of the ESR once the CHER has been updated.</p> <p>See also comment 3 of Table 1 above relating to the completion of an HIA during detailed design.</p>