

Enclosure 2: Review table for the Waterloo Airport Runway Project - Initial Project Description (IPD)

IPD submitted March 9, 2021 by the Region of Waterloo International Airport (the Proponent)

Please use this document to provide comments on the Waterloo Airport Runway Project (the Project). The document consists of two tables.

Table 1 will enable you to describe potential project effects.¹ The Impact Assessment Agency of Canada (the Agency) requires detailed advice to inform the Summary of Issues provided to the proponent pursuant to subsection 14(1) of the *Impact Assessment Act* (IAA). Please refer to prompts in the table to guide your responses.

Table 2 will facilitate the collection of general or editorial comments.

Table 1: Description of the potential effects of the Project

Comment ID	Document Reference	Valued Component	Project Component	Description of the Potential Effect (Context and Rationale)	Powers, Duties and Functions	Risk Characterization Rating	Instructions to the Proponent	Summary of the Issue
Please identify comments by organization and comment number.	If the comment is related to a specific section of the documentation, please provide a reference (e.g. title, section, subheading, page number). You may also choose to copy the relevant text here.	Identify the valued component(s)— within the mandate of your department, ministry or agency—to which the effect applies. This may include components of the environment, health, social or economic conditions.	If applicable, please indicate the project component that could cause the described effect. If the effect is linked to a power, duty or function, please identify the project component that would be regulated, monitored, or enabled by the power duty or function.	For each effect within your mandate (one effect per row), please provide the context and rationale. In your response, please respond to following points: <ul style="list-style-type: none"> Describe whether the proponent has adequately articulated the effect. Provide rationale. If the proponent's description is inadequate, please provide a detailed description of the effect, including the effects pathway from the project component to the valued component. Describe whether the proponent has identified and adequately articulated mitigation and/or monitoring measures to address the potential effect. Provide rationale. <ol style="list-style-type: none"> If the proponent has identified mitigation measures, provide your expert opinion of the proposed measures; indicate whether these mitigation measures are well understood and of proven effectiveness. If not, provide advice on how the effect could be managed through well-understood mitigation measures, and identify such measures. Describe whether the proponent has adequately articulated the potential for residual effects after mitigation has been applied. Provide a rationale. If the proponent's description is inadequate, provide advice on the potential for residual effects. 	Does your department, ministry or agency have powers, duties or functions associated with this effect? If yes: <ul style="list-style-type: none"> Identify the act and associated power, duty or function. Indicate whether the exercise of the associated power, duty or function would <u>mitigate, manage or set conditions</u> that would address the effect If applicable, ensure that mechanisms for consultation and engagement related to the power duty or function are included in Enclosure 1. 	Based on the information that you have provided, please characterize the risk by selecting a rating (from [1] to [6]) for the effect (See Enclosure 3 for definitions)	Provide a specific, actionable request for the proponent Where applicable, provide instructions for how the proponent would build confidence in the Detailed Project Description and Response to the Summary of Issues to support or confirm the risk rating selected at left.	Where potential effects have been overlooked or are missing or could be better described and presented by the proponent, provide a concise synopsis for the Summary of Issues. Please, where possible, use simple (lay) language in your summary.
MHSTCI-1	Section 9.0 Temporary structures and physical works associated with the construction, of the proposed extension.	Social Conditions - Cultural Heritage	Temporary facilities, temporary access roads and construction activities	It seems that the temporary construction areas are not depicted in Figure 13.2 (Proposed Project Activities and Components of the Designated Project). MHSTCI understands that the proponent is at the preliminary design phase. However, it seems that the Stage 1 archaeological assessment only focused on the main components of the Proposed Project.	Ontario Heritage Act, Part VI Among other provisions, the act makes it illegal for anyone but a licensed archaeologist to knowingly disturb an archaeological site.	3	Under Section 15.6 (Archaeological Environment), there should be a commitment that 'any construction staging area will be assessed for archaeological potential and, as required, further archaeological assessment will be undertaken as early as possible during the detailed design phase.'	Temporary construction facilities and work areas may impact cultural heritage resources

¹ *effects* in this context means changes to the environment or to health, social or economic conditions and the positive and negative consequences of these changes.

MHSTCI-2	Section 15.7 Cultural Heritage Environment	Social Conditions – Cultural Heritage		It is not clear whether vibration due to construction or air traffic/aviation could impact cultural heritage resources.	Ontario Heritage Act Provincial Policy Statement, 2020 – Section 2.6	3	Under Section 15.7 (Cultural Heritage Environment), there should be a commitment that in addition to noise impact assessment, vibration assessment be undertaken by qualified engineer to determine potential vibration impacts on cultural heritage resources and propose mitigative measures.	Vibration due to construction or air traffic/aviation may impact cultural heritage resources

Please insert additional rows as necessary.

Table 2: General and editorial comments - include comments such as formatting, layout or grammar

Comment ID	Document Reference	Context and Background	Instructions to Proponent
<p>Example: TC-01</p>	<p>Example: Initial Project Description Part D, section 17 Pg. 11</p>	<p>Example: The proponent has identified the Navigation Protection Act under the list of federal powers, duties, or function; however, the section appears to be consistent with changes to the legislation introduced in 2019.</p>	<p>Example: In 2019, the Navigation Protection Act was amended and renamed the Canadian Navigable Waters Act please ensure that the correct title is used.</p>
<p>MHSTCI-1</p>	<p>Section 15.6 Archaeological Environment</p>	<p>A Stage 1 archaeological assessment has been undertaken and was included in Appendix G. A brief description of that component of the environment, including the assessment/study undertaken and future commitments, were also included under Section 15.6.</p> <p>Timing of further stages of archaeological assessment</p> <ul style="list-style-type: none"> MHSTCI recommends that the timing to undertake a Stage 2 archaeological assessment, and further stages of assessment if recommended, be clearly identified. MHSTCI understands that Stage 2 AA will start as soon as the weather and soil conditions are suitable to undertake investigation. See also MHSTCI comment on Table 1 regarding potential impacts on archaeological resources by temporary construction facilities and work areas <p>Archaeology due diligence</p> <p>Given that the Stage 1 archaeological assessment (AA) report recommended further study, the IPD should commit to a timeline for the completion of the remaining stages of archaeological assessment, based on stages of project design. MHSTCI recommends that further stages of archaeological assessment be completed as early as possible during detailed design. The Stage 1 AA report (dated March 16, 2020 prepared by Archaeological Research Associates Ltd. under PIF# P007-0986-2019 has been entered into the Ontario Public Register of Archaeological Reports.</p> <p>Please note that archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommend that:</p> <ol style="list-style-type: none"> the archaeological assessment of the project area is complete and all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the <i>Ontario Heritage Act</i>) or that mitigation of impacts has been accomplished through an avoidance and protection. <p>Approval authorities (such as IAAC) 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.</p> <p>Disclosure of location of archaeological sites</p> <p>Archaeological assessment reports may identify site locations which are considered sensitive and not to be made public. To this end, the licensed archaeologist is required to record sensitive data, such as site location, in a separate Supplementary Documentation Report.</p>	<p>Timing of further stages of archaeological assessment</p> <ul style="list-style-type: none"> A Stage 2 archaeological assessment, and further stages of assessment if recommended, will be undertaken by an archaeologist licensed under the <i>Ontario Heritage Act</i>. A Stage 2 AA will be undertaken in [include estimated time, e.g. late Spring/Summer 2021?]. Further stages of assessment, if recommended, will be undertaken prior to the completion of the environmental assessment process and any ground disturbing activities. Any construction staging area will be assessed for archaeological potential and, as required, further archaeological assessment will be undertaken as early as possible during the detailed design phase. <p>Archaeology due diligence and disclosure of archaeological sites</p> <p>MHSTCI understands that IAAC and proponents like to share information as part of the environmental assessment process for accountability and transparency purposes. Therefore, MHSTCI recommends that the final report be posted on the website without the Supplementary Documentation and with MHSTCI’s letter indicating that the report has been entered into the Ontario Public Register of Archaeological Reports. If the report has not yet been reviewed by MHSTCI and entered into the Register it should not be made public. IAAC and/or the proponent may also include a disclaimer that the full report could be available upon request.</p>
<p>MHSTCI-2</p>	<p>Section 15.7 Cultural Heritage Environment</p>	<p>A Built Heritage and Cultural Heritage Landscape Assessment has been undertaken and was included in Appendix H. A brief description of that component of the environment, including the assessment, its findings and recommendations.</p>	<p>Description of Existing Conditions and Commitments</p> <ul style="list-style-type: none"> MHSTCI notes that some of the description does not align with the findings and recommendations of the Built Heritage and Cultural Heritage Landscape Assessment – Pages 97 (2nd and 3rd paragraphs) and 98 (1st and 2nd paragraph). MHSTCI recommends that this section be revised and that the Executive Summary of the Assessment be copied and pasted. <p>Proposed Recommendations to address the identified potential adverse impacts</p>

		<p>Description of Existing Conditions and Commitments</p> <ul style="list-style-type: none"> MHSTCI notes that some of the description does not align with the findings and recommendations of the Built Heritage and Cultural Heritage Landscape Assessment – Pages 97 (2nd and 3rd paragraphs) and 98 (1st and 2nd paragraph). MHSTCI recommends that this section be revised and that the Executive Summary of the Assessment be copied and pasted. <p>Proposed Recommendations to address the identified potential adverse impacts</p> <ul style="list-style-type: none"> Recommendation 1: MHSTCI recommends that the recommendation be further expanded to include guidelines for the proponent to ensure this recommendation is fulfilled e.g. minimum setback to avoid direct impact to a built heritage resource/cultural heritage landscape. MHSTCI also recommends that the recommendation be expanded to include guidelines should avoidance is not feasible. Recommendation 2: MHSTCI recommends that any proposals to install vegetation buffers or introduce any physical, visual, audible or atmospheric elements not in keeping with the character or setting should be reviewed by the municipality. Recommendation 3: In addition to Noise Impact Assessment and study of impacts to approach lights assessment, a Vibration Assessment should be undertaken to determine the potential vibration impacts to identified or candidate BHRs and CHLs and recommend mitigation measures. The IPD should clarify whether the airport will acquire any property that has been identified as a BHR/CHL. If yes, the IPD should have a commitment to discuss the future of that property and develop a proposed long-term strategy. 	<ul style="list-style-type: none"> Recommendation 1: MHSTCI recommends that the recommendation be further expanded to include guidelines for the proponent to ensure this recommendation is fulfilled e.g. minimum setback to avoid direct impact to a built heritage resource/cultural heritage landscape. MHSTCI also recommends that the recommendation be expanded to include guidelines should avoidance is not feasible. Recommendation 2: MHSTCI recommends that any proposals to install vegetation buffers or introduce any physical, visual, audible or atmospheric elements not in keeping with the character or setting should be reviewed by the municipality. Recommendation 3: In addition to Noise Impact Assessment and study of impacts to approach lights assessment, a Vibration Assessment should be undertaken to determine the potential vibration impacts to identified or candidate BHRs and CHLs and recommend mitigation measures. The IPD should clarify whether the airport will acquire any property that has been identified as a BHR/CHL. If yes, the IPD should have a commitment to discuss the future of that property and develop a proposed long-term strategy.

Please insert additional rows as necessary.