

Enclosure 1: Provincial Authority Advice Record – Ontario Pumped Storage Hydropower Project

Please submit the completed form by **April 6, 2026**, to Nottawasaga@iaac-aeic.gc.ca.¹

Submission Date	April 9, 2026
Ministry/Organization	Ministry of Citizenship and Multiculturalism
Lead Contact, Title, Work Unit, Email, Phone	Dan Minkin, Heritage Planner, Heritage Planning Unit Dan.minkin@ontario.ca 416-786-7553
Alternate Contact, Title, Work Unit, Email, Phone	Karla Barboza, Team Lead, Heritage Planning Unit Karla.barboza@ontario.ca 416-660-1027

Provincial frameworks and opportunities for cooperation

1. Describe any provincial regulatory frameworks that apply to the project (e.g., permitting, environmental assessment or registrations, compliance limits, land use policies, contractual agreements), including:
 - a) the project activities and locations to which the framework applies (considering the federal land boundary as well as multiple transmission line scenarios);
 - b) the environmental components or pathways of effect considered within the framework;
 - c) related policies or guidance documents;
 - d) any technical reports or special information required from the proponent;
 - e) any Indigenous or public consultation requirements, timelines, and participant funding;
 - f) any potential opportunities to coordinate regulatory requirements (simply ideas for further exploration), to avoid duplication, simplify steps for participants, or remove time lags; and
 - g) any known obstacles to reaching a decision under the framework (e.g., lack of information, unacceptable effects that may influence project design) and next steps to resolve issues.

The Ministry of Citizenship and Multiculturalism (MCM) will review any technical cultural heritage studies related to this Project to ensure compliance with the *Ontario Heritage Act* (OHA).

Under its mandate to conserve Ontario's cultural heritage, MCM applies the following processes and approvals to address potential adverse effects on cultural heritage resources, including archaeological resources, built heritage resources and cultural heritage landscapes. Archaeological resources include artifacts, archaeological sites, and marine archaeological sites, as defined under the OHA.

Ontario Heritage Act, Part III.1

The [Standards and Guidelines for Conservation of Provincial Heritage Properties](#) (PHP S&Gs), prepared under section 25.2 of the OHA, came into effect on July 1, 2010. All Ontario government ministries and public bodies prescribed under Ontario Regulation 157/10 must comply with the PHP S&Gs. They apply to property that is owned or controlled by the Crown in right or by a prescribed public body.

Before a provincially owned or controlled property is altered or transferred out of provincial control, it must be assessed for CHVI as per Ontario Regulation 9/06 and for CHVI of Provincial Significance according to the criteria set out in Ontario Regulation 10/06. If it meets the latter, it is deemed to be a provincial heritage property of provincial significance, and requires MCM Minister's Consent for the alteration or transfer.

Ontario Heritage Act, Part IV (individual designation) and Part V (heritage conservation districts)

Municipalities in Ontario may designate properties under Part IV or V of the OHA.

Under Part IV, municipalities may designate individual properties - whether privately or municipally owned - if they meet the criteria for cultural heritage value or interest (CHVI) set out in Ontario

¹ Advice provided to IAAC may be posted on the Canadian Impact Assessment Registry Internet Site or otherwise made available to the public upon request.

Regulation 9/06. The designation is enacted through a bylaw that contains a statement of cultural heritage value and a description of the property's heritage attributes. Any person wishing to alter a designated property in a way that could impact its listed attributes must obtain a heritage permit from the municipal council.

Under Part V, municipalities may designate Heritage Conservation Districts (HCDS) – areas with a distinct and cohesive heritage character. The designation process involves preparing a district study plan, which outlines the district's cultural heritage value and provides policies and guidelines for managing change. Once designated by bylaw, properties within the district are subject to review for alterations, demolitions, or new construction to ensure changes are compatible with the district's heritage character. Like Part IV, a heritage permit is required for alterations that may affect the district's integrity.

Ontario Heritage Act, Part VI

Under the OHA, MCM regulates archaeology and licenses archaeologists. The ministry reviews archaeological reports as a condition of licensing in accordance with Part VI of the OHA. This review is to ensure that the archaeologist has met the terms and conditions of their licence, that the archaeological sites have been identified and documented according to the standards set by MCM and that the archaeological fieldwork and report recommendations ensure the conservation of archaeological resources.

Once they have reviewed an archaeological report, MCM staff provide the archaeologist with a letter. If the report complies with the [Standards and Guidelines for Consultant Archaeologists](#) (MCM, 2011), the letter informs the archaeologist that the report has been entered into the Ontario Public Register of Archaeological Reports. The letter is copied to the proponent (e.g., ministry or prescribed public body) and the approval authority (e.g., Ministry of the Environment, Conservation and Parks, Impact Assessment Agency of Canada). Approval authorities often rely on the letter to address legislative requirements.

The legislative requirements under Part VI of the OHA itself apply equally to marine archaeology, but the operational framework differs. Licenses for marine archaeology are issued on a project-specific basis rather than on a long-term basis to an individual practitioner, and the *Standards and Guidelines for Consultant Archaeologists* do not apply. Marine archaeological reports are to be submitted to MCM but there are no standards set by MCM at this time.

Technical cultural heritage studies

At this time, it is not clear whether the project includes any provincially-owned and/or privately owned lands (vs. federally owned or regulated lands).

MCM recommends that a *Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment* (Cultural Heritage Report) be carried out for environmental assessment projects with large study areas. Such a report would describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area; identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified; and recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. Although there is no formal approval mechanism for Cultural Heritage Reports, MCM reviews them as part of its oversight of environmental assessment processes.

Cultural Heritage Reports may result in recommendations to carry out Cultural Heritage Evaluation Reports (CHERs) to confirm the heritage status of potentially impacted properties, and if they do have CHVI, Heritage Impact Assessments (HIAs) to detail the expected impacts and appropriate mitigation measures. MCM has guidance materials on the preparation of these types of reports.

Applicability:

Although the OHA does not apply on federal lands, the terms and conditions of archaeologists' licenses, including reporting requirements, would apply to all work they carry out. Underwater components of the project would presumably take place on provincial Crown lake bed and be subject to the OHA's marine archaeological framework. Part III.1 of the OHA applies specifically to provincially owned or controlled lands.

Project components subject to the *Environmental Assessment Act* (Ontario) would need to be subject to archaeological assessment (land and marine) and a Cultural Heritage Report, in accordance with the information gathering and impact assessment requirements of Ontario's environmental assessment process.

Indigenous and Public Consultation Requirements:

Indigenous and public engagement is an important part of the preparation of a Cultural Heritage Report. With respect to archaeological assessment, the *Standards and Guidelines for Consultant Archaeologists* provide that where an archaeological site of Indigenous origin is identified, the Indigenous community of closest cultural affiliation must be engaged in the development of a mitigation strategy for the site, at Stage 3 of the archaeological assessment process. It is important to note while archaeological licensee engagement may form part of a consultation strategy of a proponent, it should not be relied upon alone to fulfill consultation obligations, under section 35 of the *Constitution Act, 1982*.

MCM does not provide participant funding.

Opportunities for Regulatory Coordination:

We would consider it appropriate for an archaeological assessment, marine archaeological assessment, and Cultural Heritage Report to be carried out in support of both the IAAC Focused Assessment and the provincial Environmental Assessment, along with any other planning approvals that may be necessary for the project.

Potential effects of the project and related effects management

2. Identify any potential effects of the project related to your mandate or areas of expertise, as well as the project component or activity that may cause the effect, and describe any:
 - a) applicable provincial oversight, frameworks, policies, or guidance, including typical environmental outcomes achieved (e.g., specific criteria to be met, general policy intent, or purpose of legislation);
 - b) common, proven, or well-understood mitigation measures; or
 - c) commitments that can be made by the proponent to build confidence about the proposed effects management strategies.

Any project involving ground disturbance has the potential to disturb and damage archaeological resources. This project may also impact known or potential built heritage resources and cultural heritage landscapes. The provincial oversight mechanisms, frameworks, policies and guidance meant to address these impacts are described in response to question #1 above.

With respect to archaeology, impacts are generally mitigated through the multi-stage archaeological assessment process laid out in the *Standards and Guidelines for Consultant Archaeologists*. At stage 1, the archaeologist establishes what parts of the study area have archaeological potential, based on their historical and geographic conditions, and the appropriate methods for surveying them. At stage 2, the parts of the study area with archaeological potential are systematically surveyed for archaeological artefacts in accordance with the Stage 1 recommendations. If artefacts are found that may constitute an archaeological site, a Stage 3 site assessment is carried out around the find spot, in which more detailed survey methods are used to delineate the site boundaries, determine its cultural affiliations, and recommend mitigation methods – typically either avoidance and protection in situ if compatible with project design, or if the project cannot avoid the site, excavation and documentation of all artefacts. Stage 4 is the carrying out of this mitigation strategy.

With respect to built heritage resources and cultural heritage landscapes, some minor or indirect impacts can be mitigated through standard measures that can be recommended at the Cultural Heritage Report stage, such as vibration monitoring, protective fencing, replacement of vegetation, etc. For direct and more adverse impacts, appropriate mitigation measures may need to be

developed through the completion of an HIA, following confirmation of a property's heritage status through a CHER.

Commitments that can be made by the proponent to build confidence about the proposed effects management strategies include commitments to complete any of the above-noted technical reports that remain outstanding before commencing project work. With respect to archaeology, this would include a commitment not to proceed with ground-disturbing activities until archaeological reports recommending no further stages of assessment have been entered into the Ontario Public Register of Archaeological Reports. It should also include a commitment that in the event that archaeological materials are unexpectedly encountered during construction in spite of the completion of archaeological assessment, project work impacting these resources will cease, MCM will be notified, and an archaeologist licensed under the OHA will be engaged to assess the site as necessary. With respect to built heritage resources and cultural heritage landscapes, this would include a commitment to complete all additional studies recommended by the Cultural Heritage Report and to follow their recommendations.

We note that Section 14 of the draft IPD describes some studies that have been undertaken, however copies of those studies were not included or circulated to MCM and therefore MCM would not be in a position to confirm the results and proposed mitigation measures. It is not clear whether all the study areas of the project components have been assessed for cultural heritage resources.

Furthermore, this section indicates that there is no designated federal agency providing oversight of archaeological and cultural heritage investigation on federal lands not managed by Parks Canada. MCM also recommends that further clarification be included to clarify oversight on federal lands as it relates to cultural heritage resources.

3. To generate focused feedback from federal regulators, IAAC prepared a preliminary list of potential effects that are likely or unlikely to be key issues for a federal impact assessment (**Appendix**), should an assessment be required. Optionally, and as it relates to your mandate, provide any feedback on the list such as relevant provincial regulatory oversight or local knowledge. You may suggest other issues for consideration.

The majority of archaeological sites in Ontario are of Indigenous cultural affiliation. We agree that impacts to the physical and cultural heritage of Indigenous peoples and sites of archaeological importance, with a focus on potential archaeological resources on land or water, is a potential key issue for the impact assessment. We note however that species of cultural importance (e.g. black bear) are outside of MCM's mandate.

We note that there have been some farmsteads identified within the study area (section 14.3 of the draft IPD). MCM recommends that the proponent confirms that there are no known or potential built heritage resources or cultural heritage landscapes of interest to Indigenous communities (e.g., portage route).

Appendix²

IAAC has identified the following topics as **potential key issues** for the impact assessment:

- Effects to fish and fish habitat
 - during operations from interactions with the inlet/outlet structure such as impingement and entrainment, changes in lake flow patterns, and turbidity, which may require special attention in ongoing project design
 - during construction of the inlet/outlet structure from lake-bed disturbance and turbidity, unless this is easily managed with well understood mitigation
- Effects to the environment on federal lands
 - including federally listed species at risk, wetlands, and riparian environments that provide special habitat or functions, from construction activities and footprint location, some of which could require offsetting and special attention in ongoing project design
 - if soil contaminants are identified in overburden materials to be disturbed and/or relocated, potential changes to groundwater and surface runoff quality, to inform site specific stormwater management strategies
- Impacts to the physical and cultural heritage of Indigenous peoples and sites of archaeological importance, with a focus on potential archaeological resources on land or water, and species of cultural importance (e.g., black bear)
- Impacts to the economic conditions of Indigenous Peoples

² To generate focused feedback and dialogue, IAAC has prepared this preliminary list (as of October 1, 2025) based on limited information prior to receipt of the Initial Project Description. It may change based on input received from federal and provincial authorities, Indigenous communities, and the public.

- Effects to people from activities on federal lands, such as dust and noise interactions with base personnel, to help DND identify suitable mitigation and monitoring for any conditions it may place on a land use decision
- Positive effects of the project, including
 - economic benefits for Indigenous groups
 - contributions to Canada's ability to meet its climate change commitments for long-term targets (i.e., 2050) and displace greenhouse gas emissions in the energy sector
 - contributions to sustainability including local socio-economic benefits and Indigenous economic reconciliation

IAAC has identified the following topics as **unlikely key issues** for the impact assessment because the effects are either immaterial to decision-making, effectively managed by other regulatory mechanisms, or have well understood mitigation measures:

- Effects to fish and fish habitat from
 - loss of habitat from lake-bed footprint, which is expected to be routinely managed through an authorization under the *Fisheries Act*, if needed
 - changes to water levels in the Georgian Bay, which are anticipated to be negligible based on the volume of water taken relative to the volume in the lake
 - changes to water quality in the Georgian Bay from reservoir outflow, because the reservoir will be lined with an impermeable layer and water will not be held in the reservoir for prolonged periods
- Effects to migratory birds from construction activities due to well-understood mitigations measures, and regulations under the *Migratory Birds Convention Act*
- Effects to the environment on federal lands, including wildlife and vegetation that are not federally listed species at risk, as population-level effects are unlikely
- Effects on Indigenous peoples':
 - ability to access lands and resources for traditional purposes (harvesting, navigation), as IAAC understands that access to the surrounding land and water is already restricted by DND (apart from any land use near the potential transmission lines outside of the restricted use areas)
 - use of fish for traditional or commercial purposes because population-level changes to fish in the Georgian Bay are not anticipated; should fish population changes be a concern, effects to fishing would be considered
- Effects to the health, social and economic conditions of non-Indigenous peoples resulting from activities carried out on federal lands, including
 - changes to commercial and recreational use of water in the Georgian Bay as public access to the surrounding water is already restricted
 - changes to the visual environment as the project is primarily obscured from view
 - changes to drinking water quality from reservoir outflow because bay water will move in and out without alteration and an impermeable layer in the reservoir will prevent seepage
 - non-Indigenous cultural heritage resources due to well established protocols set by provincial standards, and regulatory oversight off-federal lands
 - impacts to the operations of the Canadian Armed Forces from construction and operation logistics, as DND can manage these in parallel through its Operational Impact Assessment
 - changes to socio-economic conditions in Meaford from the construction workforce as the proponent will focus on local and regional workers, where possible, and is working closely with the municipal government and community service providers
 - changes in energy pricing as this will be managed by Ontario's energy contracting policies and decisions
- Contributions to Canada's ability to meet its climate change commitments for short-term targets (i.e., 2035) because the project will cause greenhouse gas emissions during construction and no further information is required to conclude the project does not contribute to Canada's short-term targets
- Contributions to Canada's ability to meet its environmental obligations as no further information is required to conclude the project does not contribute to Canada's ability to meet its environmental obligations