

APPENDIX D: CONSULTATION REPORT - AMENDED

APPENDIX D-4: RECORD OF CIRCULATION OF DRAFT EPR, COMMENTS, AND RESPONSES

PART 1/1



February 16, 2017

Hamilton LRT EA

Mr. Dennis Fletcher
Associate
Steer Davies Gleave
1502-80 Richmond Street West
Toronto, Ontario
M5H 2A4

Dear Mr. Fletcher:

**Re: Hamilton Light Rapid Transit
Environmental Project Report Addendum**

Hamilton Conservation Authority staff have reviewed the Hamilton Light Rapid Transit Environmental Project Report Addendum and have no objection to its approval. We offer the following comments for your consideration.

The Addendum has been submitted to address the following specific issues:

1. Design modifications to the 2011 EPR LRT (the B-Line)
2. Complete the assessment of a spur line (the A-Line) along James Street North between the West Harbour GO Station and the Waterfront. (Note: the HCA has been notified that this aspect of the EPR Addendum is no longer under consideration).
3. New bus terminals at Queenston Traffic Circle and McMaster University along with a proposed reconfiguration at the McNab Street bus terminal.
4. Review of High Order Pedestrian Connection
5. Operations Maintenance and Storage Facility (Chatham and Frid Street).

As it relates to the above noted issues, the EPR Addendum provides specific direction for future works through site plan approvals or more specific studies and approvals. Our main area of concern in this regard is the proposed Operations Maintenance and Storage Facility. The EPR Addendum details that the proposed development on the site will be located outside of the HCA regulated area, however, the scale of the mapping makes it difficult to determine the extent of the development proposed and if there is any potential impact to the buried watercourse in this area. As part of the next steps in this project, HCA staff would request that we be circulated the detailed design for this area and supporting reports (e.g. stormwater management plan).

We note that portions of the project area associated with Chedoke Creek are regulated by the Hamilton Conservation Authority pursuant to the HCA *Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation 161/06* under Ontario Regulation 97/04.

Should you have any questions, please contact the undersigned at (905)525-2181, ext. 130 or at tspeck@conservationhamilton.ca.

Sincerely,



T. Scott Peck, MCIP, RPP
Director, Watershed Planning & Engineering

TSP/tsp

pc: Paul Johnson, Director, LRT Project Coordination, City of Hamilton

February 23, 2017

Dennis Fletcher, Associate
Steer Davies Gleave
80 Richmond St. W.
Toronto, ON

**Re: Hamilton Light Rail Transit – Draft Environmental Project Report Addendum – City of
Hamilton – MNRF Comments**

Mr. Fletcher,

The Ministry of Natural Resources and Forestry (MNRF) Guelph District can confirm receipt of the Draft Hamilton Light Rail Transit (LRT) Environmental Project Report (EPR) Addendum and Ecology Update – Final Report (received by MNRF February 17, 2017). It is understood that the Addendum focuses only on changes to the approved Hamilton LRT 2011 EPR, as outlined in Section 1.3 of the report. The MNRF has reviewed the Draft EPR Addendum and Ecology Update Report and can offer the project team the following comments.

Ministry Involvement to Date

MNRF provided a response to an information request regarding this project in an email (dated July 6, 2016) to the project team.

MNRF Comments

Ecology Update – Final Report

Section 5.1 Potential Permitting Requirements

- Section 5.1 states that “Three species listed under the Ontario Endangered Species Act list have been identified to have either known sightings or habitat in and in close proximity to the proposed study area. These species include; Butternut, Chimney Swift and Little Brown Myotis.” MNRF staff note that Barn Swallow (threatened) should also be included in this list as it was documented foraging within the OMSF lands, and potentially nesting within the adjacent Canadian Drawn Steel Company buildings.

Draft Hamilton Light Rail Transit Environmental Project Report

Vegetation and Vegetation Communities

- Section 6.7.2 of the Draft EPR Addendum notes that a “focused butternut/health assessment survey should be conducted as part of the tree inventory during detailed-design.” A targeted butternut/health assessment survey is strongly recommended to ensure that the proposed undertaking will not contravene the *Endangered Species Act, 2007* (ESA). The assessment survey should include the vegetative areas of the OMSF and Cathedral Park, in addition to other treed areas within the influence zone of construction. MNRF staff suggests that the survey area includes suitable vegetative areas located within a minimum of a 50 m setback from the limits of disturbance.

Wildlife and Wildlife Habitat

- Section 6.7.3 of the Draft EPR Addendum notes that a “detailed Species at Risk assessment should be undertaken during the detailed-design component of the study for Chimney Swift and Bats.” The Ministry strongly recommends targeted species at risk surveys for chimney swift and bats if the activities associated with the proposed undertaking have the potential to impact any of these species or their habitat (e.g. building removal). A management biologist at the local MNRF district office should be contacted prior to undertaking bat surveys to ensure that they align with our most recent district approved survey protocols. You may contact David Denyes, Management Biologist out of the Guelph District Vineland office by email at David.Denyas@ontario.ca.

General Comments

- In order to minimize disturbance to barn swallows that are assumed to be nesting in the adjacent Canadian Drawn Steel Company buildings and that were observed foraging within the OMSF lands, it is recommended that site alterations within the suitable foraging areas of the subject lands be scheduled to avoid critical times when the barn swallow are carrying out key life processes relating to breeding, nesting and rearing. The period of greatest energy demand for a swallow is during nestling rearing. This barn swallow active season usually starts around the beginning of May and ends around the end of August.
- As noted within the Draft EPR Addendum, MNRF should be contacted directly to discuss threatened, endangered or extirpated species protected under the ESA that are observed within the limits of disturbance to ensure that activities remain compliant with the Act. Furthermore, the Ministry encourages you to report all sightings of rare species (animals and plants), natural and wildlife concentration areas in Ontario to the Natural Heritage Information Centre (NHIC). It would be appreciated if you could report the sightings of butternut, chimney swift, and barn swallow using the Rare Species Reporting Form to the NHIC. For information on how to report these sightings, please refer to the following website; <https://www.ontario.ca/page/report-rare-species-animals-and-plants>.

Closing

The MNRF appreciates the opportunity to review and provide comment on the Draft Hamilton Light Rail Transit Environmental Project Report Addendum and Ecology Update – Final Report.

If further comment or clarification is required please contact the undersigned.

Regards,



Tara McKenna
District Planner

Ministry of Natural Resources and Forestry, Guelph District
1 Stone Road West
Guelph, ON, N1G 4Y2
Phone: (519) 826-4912
Email: tara.mckenna@ontario.ca

cc: David Denyes, MNRF
Joad Durst, MNRF

Ministry of the Environment
and Climate Change

Environmental Approvals
Branch

135 St. Clair Avenue West
1st Floor
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax: 416 314-8452

Ministère de l'Environnement et
de l'Action en matière de
changement climatique

Direction des autorisations
environnementales

135, avenue St. Clair Ouest
Rez-de-chaussée
Toronto ON M4V 1P5
Tél : 416 314-8001
Télééc. : 416 314-8452



February 22, 2017

MEMORANDUM

TO: Tania Zimmerman

FROM: Beau Wansbrough
Project Officer
Environmental Approvals Branch

RE: Hamilton TPAP Addendum
EA FILE NO. 07-03-02-02

The Project Coordination Unit of the Environmental Approvals Branch has reviewed the draft Environmental Project Report (EPR) for the City of Hamilton and Metrolinx Hamilton Light Rail Transit (LRT) Environmental Report (EPR) Addendum. Please find our comments below.

General Comments

- Reading the Addendum it is not clear what was completed in the 2011 TPAP process.

Wherever possible explain/summarize the contents of the 2011 EPR instead of only referencing it. It is not an attached document and leaves readers missing critical information.

For example, in Section 1.2 the changes to the project considered significant are listed stating all the items that were not addressed in the Hamilton LRT 2011 EPR, it would be helpful if there was also a summary of what was addressed and approved in the 2011 EPR.

- Throughout the document there are references to A-line, as indicated through correspondence the A-line is not proceeding and should be removed.

- The MacNab reconfiguration is not proceeding through this process and therefore any references and sections for them should be provided as context and not part of this undertaking.
- Provide an ownership map, along with a breakdown of the hectares of property affected.

Mapping

- When Figure 1-2 is revised to remove the A-line it is recommended to highlight that the Frid Street Extension is related to the Operations, Maintenance and Storage Facility (OMSF) site. This is not clear up front in the document. This could also be addressed in the text.
- Section 1.3.1 contains a lot of information. This section would benefit from one or several maps indicating detailed areas discussed for the B-line.
- Section 2.4.1 could also benefit from associated mapping.
- Figure 2-8 is too small to see the legend and the details.
- Figure 2-9 is also too small to see the details.
- Figure 4-11 Frid Street Extension Re-alignment – Plan and Profile, incomplete.
- Legends and details should be visible for the reader on all the figures and maps.

Commitments

- In Section 5.11 - please include a commitment to inform First Nations communities of any future relevant Stage 1 and Stage 2 Archaeological Assessment findings.
- Commitments to future works related to heritage components should be stated in Section 6.7.9 (i.e. Metrolinx' commitment to protecting heritage properties where possible).
- Discussion is required related to additional information and commitments to address an approach to potential impacts and mitigation on heritage resources.

Incomplete Section

- In Section 5.2.3, PIC #2 Responses is left blank.

Future Commitments to Work/Incomplete

- Section 6.6 Environmental Disciplines is left blank. This should be completed prior to submitting.
- Section 6.7.9 states "commitments for properties with direct and indirect impacts are currently being identified". At minimum the impacts should be identified at a high level in the TPAP.

Climate Change Impacts and Mitigation

- In Section 4.6.1 states that the compensation of existing tree loss and replacement will be specified in the Landscape Plan, developed during the detailed-design phase of the project.

MOECC would like to see a commitment in the addendum to compensate tree loss at a net benefit during the detailed design phase.

Impact Assessment, Mitigation and Monitoring

- Section 4.8 Summary of Potential Impacts, Proposed Mitigation Measures, Monitoring and Future Work - is recommended to add a summary of the 2011 TPAP Commitments or provide an appendix with this information.

Description of Approval and Permits

- Section 6.2 references the 2011 EPR. This does not help the reader understand the approvals and permits required. Please list and fill out this section accordingly or provide an appendix.
- Section 6.6 is left blank. Future commitments to Environmental Disciplines should be completed.

Consultation Record

- The social media section has information missing.
- Affected property owners section refers to additional meetings that were requested. Please list the additional meetings/concerns raised.
- Were any comments submitted in writing? Please clarify in Appendix D or in TPAP.
- Section 5.7 describes a meeting with MOECC to discuss the addendum that did not take place.

Please provide a response to the comments raised and any other issues identified by the government reviewers.

The Ministry also expects to see revised portions of the report prior to the final notice being issued.

Should you have any questions on the comments above, please contact the undersigned at 416-314-1181 or by e-mail at Beau.Wansbrough@ontario.ca.

Regards,

A handwritten signature in black ink, appearing to read "Beau Wansbrough", written over a horizontal line.

Beau Wansbrough, RPP
Project Officer
Environmental Approvals Branch

January 30, 2017

Attention: Administrative Coordinator
Archaeology Reports
Ministry of Tourism, Culture and Sport
Culture Programs Unit
Programs & Services Branch
401 Bay Street, Suite 1700
Toronto, ON M7A 0A7

Re: Request for Expedited Review
Original Report: Stage 1 Archaeological Assessment
Hamilton Light Rail Transit - Environmental Project Report Addendum Part of Lot
19-21, Concession 3 (Former Township of Barton) County of Wentworth City of
Hamilton, Ontario (PIF # P128-0153-2016)

Please accept this letter requesting an expedited review of the above-noted archaeological assessment report, conducted under archaeological consulting license #P128, PIF# P128-0153-2016. This letter is being submitted by our archaeological consultant, ASI, as part of the digital report package.

This archaeological assessment was required as part of the Environmental Project Report Addendum for the Hamilton LRT project. The purpose of requesting an expeditious review of this report is to maintain the construction schedule, which is currently underway.

If possible, we would appreciate this report to be reviewed by February 23, 2017 or sooner.

Your assistance in expediting the review of this report is appreciated and will ensure scheduled timelines are met.

Sincerely,



Paul Johnson
Director, LRT Project Coordination
Light Rail Transit Office | City of Hamilton
T: 905.546.2424 x6396 | C: 905.977.7458
paul.johnson@hamilton.ca



Andrew Hope
Director, Hamilton Light Rail Transit
Rapid Transit | Capital Projects Group | Metrolinx
T: 416.202.4621 | C: 647.938.9954
andrew.hope@metrolinx.com

Ministry of Tourism, Culture & Sport **Ministère du Tourisme et de la Culture**

Heritage Program Unit
Programs and Services Branch
401 Bay Street, Suite 1700
Toronto ON M7A 0A7

Tel. 416 314-7159
Fax: 416 212-1802

Unité des programmes patrimoine
Direction des programmes et des
services
401, rue Bay, Bureau 1700
Toronto ON M7A 0A7
Tél. : 416 314-7159
Télééc. : 416 212-1802



March 7, 2017

Tania Zimmerman (via email only)
Environmental Project Manager
Metrolinx
10 Bay Street
Toronto, ON

Dear Ms Zimmerman

MTCS File#: 25EA025
Proponent: Metrolinx
Subject: Draft EPR Addendum received Jan 18th, 2017 - Hamilton LRT TPAP
Location: City of Hamilton

Thank you for providing the Ministry of Tourism, Culture and Sport (MTCS) with the Draft EPR Addendum for the Hamilton LRT project. MTCS's interest in this TPAP project relates to its mandate to conserve Ontario's cultural heritage, which includes archaeological resources, built heritage resources, and cultural heritage landscapes.

MTCS has reviewed the DRAFT EPR Addendum, including the Technical Studies and other appended materials and has the following comments and recommendations. Included are:

1. Comments on key changes proposed under the draft EPR Addendum and implications for the cultural heritage component
2. Report-specific comments provided in the attached Table.

1. Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component:

1. LRT: B-Line (McMaster University to Queenston Traffic Circle)

The 2011 B-Line LRT was designed to run within the roadway and did not appear to require the demolition or removal of buildings along the corridors. Section 4.2 of the 2011 Approved EPR (p 4-8) states that during the preliminary design process it was identified that 80 properties will have impacts on access to their site, or impacts to their frontages. The **two properties** that will experience significant impacts are at the proposed terminal stations at McMaster University and Eastgate Square (refer to Design Plates in Appendix A.1. Some of the impacts may require full acquisition of the parcels affected.

Section 4.3.2-Land Use (p 4-11) of the current 2016 Draft EPR Addendum states,

A number of properties along the corridor will have impacts on access to their site, or impacts to their frontages. Additionally, some may require full acquisition of the parcels affected, such as the OMSF site or the proposed terminal stop at Queenston Circle, as well as properties along the corridor. Property impacts near LRT stops and at the proposed CP Rail underpass east of Gage Avenue may require demolition of buildings. **In the current preferred design, approximately 250 properties are affected, including approximately 86 properties where there is a potential building impact...**

Based on our review of EPR design plans and discussions with Metrolinx we understand "potential building impact" to mean demolition of the buildings. In some areas, the proposed project re-design requires the demolition of several buildings adjacent to one another and in certain areas within the same city block.

The 2011 technical cultural heritage study for the 2011 approved EPR identified all or some of the areas where extensive building demolition is to occur as being “streetscapes” (i.e. cultural heritage landscapes) with some degree of cultural heritage value or interest. Metrolinx has advised that evaluations to determine the Cultural Heritage Value or Interest (CHVI) of these properties are currently underway. As we have previously advised, the evaluations should consider these properties both individually and within the context of the overall landscape (streetscape).

We look forward to receiving the additional technical studies for review when they are completed. Please be aware that we may have additional comments after our review. In addition, we would appreciate being provided with a list and mapping of the properties where building demolition is proposed.

Meanwhile, we recommend the Draft EPR Addendum be revised to clearly articulate the extent to which the proposed re-design will result in the likely demolition or significant alteration of cultural heritage resources (CHRs), including built heritage resource and cultural heritage landscapes. Given the extent of proposed building demolitions and for clarity, we suggest including a rationale for re-designed plan and why impacts are unavoidable.

Additionally, the Stage 1 archaeological assessment (AA) completed in 2009 by Archaeological Services Inc. for the B-Line LTR corridor concluded that while the roadways themselves had been previously disturbed and retained no archeological potential, several areas immediately adjacent remain undisturbed and retain archaeological potential. Further archeological assessment (Stage 2 AA and Stage 3 AA if warranted by the Stage 2) is required for those areas. Given the extent of impact outside the right-of way, and consistent with our previous advice, the Draft EPR Addendum must reference the 2009 Stage 1 AA and its recommendations.

We note Metrolinx’s advice that the lands surveyed in the 2009 Stage 1 AA included a broad buffer area so that no new land is being affected by the proposed B-Line modifications. However, given that modifications to the B-line are now proposed, and for clarity, we suggest that reference to the 2009 Stage 1 AA be reiterated. With regard to further assessment, we suggest that, at minimum, the draft EPR Addendum be revised to identify those areas requiring further archaeological assessment, and to include a statement that Metrolinx has not yet gained access, or Permission to Enter, the property. If possible, a commitment should be included to when those assessments will be undertaken, preferably prior to completion of detailed design phase.

2. McMaster University Terminus

Please be aware that McMaster University is a property designated by the municipality under Part IV of the Ontario Heritage Act (By-Law No.08-002). Property boundaries run immediately adjacent to the public right of ways (including sidewalks) along Main St West and Cootes Drive. This being the case, if any of the MacMaster property is to be impacted by the LRT/bus terminal, a Heritage Permit from the City of Hamilton may be required. We suggest that the City of Hamilton’s heritage planning staff be contacted and the appropriate revisions made to the Draft EPR Addendum.

3. CP Rail Crossing – Grade Separation (King Street East from Fairview Ave to East Bend Ave North AND CP Crossing to Dunsmure Rd)

The 2011 approved EPR did not include this grade separation. Metrolinx has advised that based on further review of the potential operational impacts on the LRT and safety risks, and discussions with CP Rail, the decision was made to include the grade separation as part of the EPR Addendum. The 2011 technical heritage study identified properties in the vicinity of the grade separation as being part of streetscape i.e. cultural heritage landscape (CHL 21), but did not anticipate impacts. Metrolinx has advised that evaluations to determine CHVI of these properties are currently underway and we look forward to receiving them when completed.

4. Queenston Terminus (Main Street East Strathern Ave and Queenston Road)

The 2011 cultural heritage report identified the existing Queenston Traffic Circle as an example of, and likely be one of the last, “old-style traffic circles” for the 1950’s. Loss of this cultural heritage resource was noted in the 2011 cultural heritage study and in the EPR, which also included a commitment to “preserve through documentation” any CHRs including the Traffic Circle.

The Queenston Traffic Circle was not identified in the 2016 CHSR. MTCS would ask that the 2011 EPR commitment to document this CHR be confirmed in the EPR Addendum.

Archaeology: The 2009 Stage 1 AA for the B-Line identified an area in the vicinity of the Queenston Terminus as retaining archaeological potential. The required archeological assessments (Stage 2 AA and Stage 3 AA if warranted by the Stage 2) must be completed for this area.

5. High-Order Pedestrian Connection to Hamilton GO Centre

It appears that the 2011 EPR did not anticipate the High-Order Pedestrian Connection. Neither the 2016 Draft EPR Addendum nor the 2016 CHSR identifies the existing cultural heritage environment/conditions for the High-Order Pedestrian Connection area. While we understand that the proposed “Streetscape Design Approach” is largely landscaping / hardscaping, the existing cultural heritage conditions should nonetheless be identified

A quick overview of the Hughson Street corridor reveals that nearly every property along Hughson Street from Hunter to King St has properties that are either designated by the municipality or included in the City’s Heritage Inventory (municipal heritage register). For your information and assistance we offer the following: Properties designated by the municipality under Part IV (Ontario Heritage Act) include,

- Hamilton GO Centre (36 Hunter St E at Hughson St) Designated by By-Law 94-125. The property was identified by Metrolinx as a provincial heritage property of provincial significance on September 23, 2013 and
- 45 Main Street E (partial frontage on Hughson St) Designated by By-law 93-11

Properties included in City of Hamilton’s Heritage Inventory include:

- 21 Hunter Street East (at Hughson) – Cooper Building; Status: Registered Non-Designated (Council approval Sept 23, 2014)
- 44 Hughson Street South (at Jackson St East) – Bell Telephone Company Building; Status: Registered Non-Designated (Council approval Sept 23, 2014)
- 50 Main Street East (at Main St E) McMaster University Downtown Centre for Continuing Education former Hamilton Court House; Status: Registered Non-Designated (Council approval Sept 23, 2014)
- 31 Main St E / 20 Hughson St South (Union Gas Building) Status: Registered Non-Designated (Council approval Sept 23, 2014)
- Gore Park Status: Registered Non-Designated (Council approval Oct 28, 2008), AND
- Every property on both sides King Street East in front of Gore Park.

6. Operations, Maintenance and Storage Facility (OMSF) AND 6. Frid Street Extension

The preferred location for the OMSF is in the vicinity of Chatham Street and Frid Street east of Longwood Road. This location is near 606 Aberdeen Avenue (former Westinghouse Industrial property). We understand that a Cultural Heritage Evaluation Report (CHER) is being undertaken to determine whether the property has CHVI. Both the results of the CHER and the potential impacts should be included in the EPR Addendum.

Archaeology: A Stage 1 archaeological assessment was undertaken for the OMSF site. MTCS records indicate that AA report was submitted to the Ministry on February 9, 2017 but we still need to review it. Please be aware that the archaeology review officer may have additional comments when reviewing it.

The EPR Addendum should clearly state that this AA pertains only to the OMSF site and not to other components of the LTR project.

7. MacNab Reconfiguration

Proposed changes to the MacNab Transit Terminal are to close the MacNab access and to reconfigure the terminal to provide access to or from Main Street and James Street only. Details of the reconfigured terminal are not included in the Draft EPR Addendum.

From a cultural heritage perspective every property (building) on the city block bounded by NacNab to the west, King Street West to the north, James Street to the east and Main Street West to the south is either designated by the municipality or included in the City’s Heritage Inventory. Numerous additional properties in the immediate vicinity are also designated or included in the City’s Heritage Inventory.

The EPR Addendum should be revised to clearly identify the existing cultural heritage conditions of the MacNab Transit Terminal, and appropriately consider potential impacts, if any.

2. Table of Report specific comments

Draft EPR section	MTCS comment and recommendation
List of Appendices C-10 Stage 1 AA Report	NOTE: The Stage 1 AA report appended to the Draft EPR Addendum is for ONLY the OMS Facility and run-in track at Frid and Longwood. Two other Stage 1 AA reports were completed in 2011 for the A-Line and the B-Line. Because of the proposed modifications to the B-Line the previously completed AA reports and its recommendations should also be referenced in the EPR Addendum and appended.
C-11 Cultural Heritage Report	Please correct the report title to :Cultural Heritage Screening Report”
1.3.1 Study Area (p1-2)	The Addendum Study Area is divided into three areas where physical changes are proposed, yet five section areas are listed. Also, section 2.0 (see below) describes at least 9 key components. Please clarify and revise accordingly. Also, for readability and clarity we suggest that sections 3- existing conditions and 4.- impacts be divided under subheadings to address each of these sections area.
2.0 Update to Project Description (p 2-2 to 2-10)	Further to our comment on section 1.3.1, for clarity and readability the project components should be consistent throughout the EPR Addendum. Section 2.0 describes the following key components: <ol style="list-style-type: none"> 1. B-Line 2. A-Line (Removed from this project) 3. McMaster University Terminal 4. CP Rail Crossing 5. Queenston Terminus 6. MacNab (Terminal) Reconfiguration 7. High-Order Pedestrian Connection to Hamilton GO Centre 8. Operations, Maintenance and Storage Facility (OMSF) 9. Frid Street Extension Please clarify and revise accordingly.
2.3 “Rapid, Reliable and Safe” Design Approach (p2-1 to 2-2)	The last two bullet points (top of p 2-2) refer to a “need for land and property acquisition” to accommodate platforms and turn lanes. The Draft EPR Addendum should clearly state where the proposed project design will result in demolition of buildings.
3.0 Existing Conditions	
3.3 Cultural Environment	General Comments 1.For readability and clarity we suggest dividing into appropriate subheadings to address each of the study area sections (see 1.3.1 Study Area (p1-2) and or section 2.0) 2. Since B-Line is a lengthy corridor it could be further divided into smaller segments. For clarity and readability maps showing the cultural heritage resources in relation to the corridor should be attached. 3. The existing cultural heritage conditions states that it includes all recognized, designated, identified (e.g. “listed”) properties, as well as those identified by the previous (2011) and current (2016) technical studies which are currently being undertaken. The CHSR provides appears provide raw data and direction for further studies to determine cultural heritage value or interest. The EPR Addendum should include the results of the CHERs that are currently being undertaken.
3.3.1 Archaeological Resources (p 3-26)	1. Refers ONLY to the Dec 2016 Stage 1 AA. for the OMSF site. In fact two previous Stage 1 AA undertaken for B-Line and A-Line. All AA reports, their outcomes and recommendations must be referenced (usually stated in the Executive Summary). NOTE: the Stage 1 AA for the B-Line recommended a Stage 2 AA in identified

Draft EPR section	MTCS comment and recommendation
	<p>areas.</p> <p>3. The information included in this section is largely the research and historical background portion from the Stage 1 AA report. While it is required in the AA it does not address the existing conditions of the study area. For your information, the pertinent details of the AA are usually captured in the Executive Summary.</p> <p>For readability and clarity we suggest deleting the current text, and including only the salient portions of the technical studies as it relates to the project, including :</p> <ul style="list-style-type: none"> • study undertaken – who, when, why • results (Areas of potential?) • recommendations (further AA or not) <p>We offer the following sample text:</p> <p><i>A Stage 1 AA was undertaken on [date] by [consultant archaeologist] for [state property]. A Stage 1 AA consists of . . . and its purpose is to identify areas of archaeological potential and further archaeological assessment (e.g. Stage 2-4) as necessary.</i></p> <p><i>Then include the outcomes and recommendations of the report (e.g. as in Executive Summary)</i></p>
<p>3.3.2 Built Heritage and Cultural Heritage Landscapes (p 3.29)</p>	<p>1. For readability and clarity we suggest dividing this section into subheadings to address each of the study area section areas (see 1.3.1 Study Area (p1-2)). Since B-line corridor is lengthy, it should be further sub-divided into readable sections. A map would help to add clarity.</p> <p>2. Under the TPAP, protected heritage properties, built heritage resources and cultural heritage landscapes i.e. properties that have been evaluated using the criteria in Ontario Regulation 9/06 and 10/06 and that have determined to have cultural heritage value or interest. We understand that additional evaluations are currently being undertaken. The results of these technical studies must be included in the EPR Addendum.</p> <p>3. The existing cultural heritage conditions of each study section areas, even if they will not be impacted by the proposed project. For example, the proposed GO High-Order Pedestrian Connection which extends along Hughson St from the Hamilton Centre GO Station to King Street is flanked by designated and listed properties. This is also the case for the MacNab Bus Terminal</p> <p>4. Similar to the comments above for archaeological resources, this section should be revised to include only the salient data/information from the technical studies. It is not necessary to reproduce report in full since it is appended to the EPR Addendum. Instead, we suggest an introductory paragraph or two referring to the technical studies that were done, when, by whom and their purpose. As we have stated the results of the CHER must be included.</p> <p>5. Summary Screening Table and Table 3-13 (p 3-33 to 3-37). The Draft EPR Addendum should include information that speaks to the current cultural heritage environment of the study area. We suggest removing Table 3-13, and replacing it with an overview/summary of the results of the screening are described the existing cultural heritage condition of each study area segment.</p>
<p>Screening Outcomes (p 3-37)</p>	<p>Under the TPAP, the EPR Addendum must identify properties with cultural heritage value or interest, regardless of ownership. The four categories of possible outcomes reflect a Metrolinx internal Interim Heritage Management process. It does not address the TPAP. If these categories are to remain in the EPR Addendum, we suggest including a description of what they mean. For example,</p> <ul style="list-style-type: none"> • “potential PHP” is a property owned by Metrolinx that has potential CHVI; • “conditional HP” is a property that has potential CHVI, not currently owned by MX, but may be acquired by MX as a result of the project; • “Adjacent Lands” are recognized and/or protected heritage properties that adjoin the study area corridor but that will not be impacted by the project [you

Draft EPR section	MTCS comment and recommendation
	<p>may want to add a sentence explaining why this is important to identify];</p> <ul style="list-style-type: none"> • “Non-Heritage Property” is a property identified in the screening but one that does not meet any screening criteria
<p>3.3.3 Cultural Heritage Evaluations (p 3-37)</p>	<p>1. We suggest adding a paragraph to explain the basis for determining which properties are evaluated [it seems that not all properties meeting the screening criteria (with potential CHVI) are evaluated]. This section could also tie in any difference/discrepancies/gaps between the CHSR and the 2011 CH report.</p> <p>2. When available, only a summary of the outcome of the evaluation should be included. For example, <i>606 Aberdeen Ave was evaluated and determined to have CHVI (or not, as the case may be).</i> <i>The results of the evaluation were confirmed by the MX Heritage Committee on [date] and a Decision Form . . .</i></p>
<p>606 Aberdeen Ave (p 3-38)</p>	<p>1. See previous comment. Include only the outcome of the evaluation, e.g. <i>606 Aberdeen Ave was determined to have CHVI under O. Reg 9/06 (or 10/06 as the case may be). As MX Heritage Committee has reviewed the CHER and confirmed the evaluation on [date]</i></p> <p>2. <u>Community Interest</u>–states “Engagement to consider <u>opinion of the subject site</u>. . .” It is not clear what this section is intended to address please clarify and/or re-word as necessary.</p> <p>3. the last paragraph states: “The research and analysis for this property as a basis for evaluating the site’s potential heritage significance has demonstrated through limited municipal and community engagement that the property is considered to hold significant heritage value.</p> <p>a) The meaning/intention of the sentence is not clear. Please clarify. b) Use terminology that is consistent with the OHA, Provincial S&Gs, PPS etc. For example:</p> <ul style="list-style-type: none"> • Use the term “property” instead of “site” • Use “potential cultural heritage value or interest” instead of “potential heritage significance” • Use by “cultural heritage value or interest” instead of “significant heritage value” <p>Note: In the Provincial S&GS context the term “significance” refers to a properties level of significance e.g. a PHP of provincial significance</p>
<p>List of properties being evaluated (p 3-38)</p>	<p>This list is also on p 3-37. Likely an editing/drafting error</p>
<p>Table 3-15 Approved One-way conversions . . . (3-38)</p>	<p>It looks like this table should be moved to a different section of the report. It is not related to Heritage.</p>
<p>4.4 Cultural Environment (p 4-12 to 4-24)</p>	<p>General comment</p> <p>1. For clarify and readability we recommend that this section be divided by subheading to address the varying impacts for different study area sections.</p> <p>2. Overall the purpose of this section is to identify potential project impacts to the cultural heritage environment, and state how those impacts will be avoided or mitigated.</p> <p>This section should clearly describe and articulate the potential project impacts. For example, it seems that some sections of the B-Line corridor will result in the demolition of a number of buildings adjacent to one another and on the same city block. Other sections, such as the B-Line through the “International Village” will result in no impacts outside the existing roadway. Perhaps the Draft EPR Addendum can address the different designs being proposed.</p>

Draft EPR section	MTCS comment and recommendation
<p>4.4.1 Archaeology (p 4-12)</p> <p>Paragraph 1.</p>	<ol style="list-style-type: none"> 1. Reference to the AA report should be in the body of the report and not as a footnote. 2. There are three Stage 1 AA reports for this TPAP. The current EPR Addendum refers only to the Stage 1 AA completed in 2016 for the OMSF. The OMSF site does not require further AA. 3. Stage 1 AA for A-Line (ASI 2012) – identified archaeological potential within the sturdy corridor, and recommended Stage 2 and possibly Stage 3, for identified areas. 4. Stage 1 AA for B-Line (ASI 2009) – identified archaeological potential and recommended Stage 2 for identified areas. 5. FYI –each Stage 1 AA includes a map that shows areas of potential being the areas where further AA (i.e. Stage 2 or more) is required. Suggest attaching the maps to the EPR Addendum.
<p><i>Construction/Operations Impact</i></p>	<p>The text must reflect the specific outcomes and recommendations of each Stage 1 AA. This information is typically included in the Executive Summary.</p> <p>As suggested in the previous comment, include the AA map in the EPR Addendum.</p>
<p><i>Mitigation Measures and Net Effects</i></p>	<p>The current is the standard general commitment for “accidental” finds. This text should remain in the EPR Addendum. However, it does not take the place of specific mitigation measures and net effects. The specific outcomes and recommendations of each AA must also be included (see previous comment).</p>
<p><i>Monitoring/Future Work</i></p>	<p>This sections states, <i>“During construction, a licensed archaeologist should be on site to monitor earthworks in areas exhibiting archaeological potential”</i>.</p> <ol style="list-style-type: none"> 1. Commitment for future work must be specific and be consistent with the recommendation in the archaeological report. Monitoring during construction is rarely recommended and then only in specific instances. 2. MTCS’s advice is to complete all required AA (Stage 2 and Stage 3 if recommended by the Stage 2AA) as early as possible in the planning stages of projects. We understand that in some cases MX may not have Permission to Enter onto privately owned properties, but as we have previously advised, best efforts should be made to complete additional stages of AA. Waiting until construction to address archaeological concerns (as with monitoring) can result in costly delays to your construction schedule. 3. Commitments for future work must be specific, consistent with the recommendations of the AA reports, and include a specified time frame for completion.
<p>4.4.2 Built Heritage and Cultural Landscapes (p4-12 to)</p>	<p>1.For consistency and accuracy, change title to Built Heritage and Cultural <u>Heritage Landscapes</u>. Ideally, titles for Section 3.3.3 and 4.4.2 should read: “Built Heritage <u>Resources</u> and Cultural <u>Heritage Landscapes</u>”</p>
<p>Paragraph 1 and 2</p>	<ol style="list-style-type: none"> 1. Similar to comments above for Archaeological Resources reports referenced should be included and described in the body of the report and not as a footnote. 2. In addition to the CHSR, two previous cultural heritage reports, one for B-Line and one for A-Line were completed in 2011. The EPR Addendum must be clear about the information and address possibly inconsistencies between the reports.
<p>Construction/Operation Impacts</p>	<p>The EPR Addendum must describe anticipated impacts of the project, in general and describe the anticipated impacts to the identified cultural heritage resources (CHR).</p> <p>We suggest a general introductory paragraph describing general impacts, then a table/chart describing specifically anticipated impacts to each identified CHR.</p> <p>For example, it could say something like, <i>In some sections of B-Line [specify which sections] the proposed design is a centre LRT with traffic lanes. This will require the existing roadway to be widened by xxx</i></p>

Draft EPR section	MTCS comment and recommendation
	<p><i>feet/meters and will require the removal/demolition of buildings etc.</i></p> <p><i>For A-Line along James St N the LRT has been designed . . .to ensure only the existing roadway will be impacted etc.</i></p>
<i>Mitigation Measures and Net Effects</i>	While the high-level statements in this section can remain, they do not take the place of specific mitigation measures that must be included to address each identified CHR.
<i>Monitoring/Future Work</i>	<p>This section states:</p> <p><i>“Based on the results of vibration studies, appropriate conservation plans should be developed, including but not limited to building/and or façade stabilization measures or development of appropriate setbacks”.</i></p> <p>The EPR should include specific commitments for future studies and how they will inform the detail design phase, if necessary, timelines for their completion (prior to completion of detail design) and appropriate consultation (at a minimum MTCS, Hamilton’s Heritage Planning staff, and municipal heritage committee.</p> <p>While we understand that the property/project impacts will be refined at the detail design phase, the anticipated impacts based on the current level of design should be stated as part of the draft EPR and the TPAP.</p>
<i>Table 4-5: B-Line LRT Corridor Screening Outcomes (p4-13 to 4-23)</i>	The EPR should provide outcomes of the cultural heritage evaluations.
Cultural Heritage Screening (p 4-23)	Appears to be duplication of 3.3.3 and in any event out of place in the Impacts section of the EPR Addendum. Suggest removing it.
<i>Direct Impacts and Mitigation Measures (p4-23)</i>	No information provided
<i>Indirect Impacts and Mitigation Measures (p 4-24)</i>	No information provided
<i>Summary of Potential Impacts and Mitigation Measures (p 4-24)</i>	<p>No information provided</p> <p>Given to number of properties and the amount of information, you might consider having only two tables, one for Direct Impacts and the other for Indirect Impacts, but including the four column headings of the Summary table.</p> <p>Under the Summary heading you could include a paragraph or two of commitments.</p>
5.0 Consultation	
5.2.2 Public Open House and Online Consultation #2 (5-2)	<p><i>The focus of PIC #2 was to identify modifications to the present the environmental effects of the proposed changes to the project and proposed mitigation.</i></p> <p>Since the PIC has already taken place and another is not planned for this project, we are not providing specific comment at this time. However, we would like to work with Metrolinx to develop language for PIC/consultation presentations for future projects to address the cultural heritage component of the TPAP.</p>
6.0 Commitments to Future Work	
Table of Contents (p 6-1)	Please use correct and consistent terminology. Change title to “Built Heritage Resources and Cultural Heritage Landscapes”
6.4 Property Acquisition (p 6-1)	<p>This section states, “. . .The preliminary property requirements will also be confirmed during the detailed-design phase of the study”</p> <p>Some of the properties being acquired have been identified as potential CHRs, and in some cases buildings/structures on those properties will be demolished. The extent of acquisition for those properties should be identified during the TPAP, and should include a commitment to inform and consult with MTCS, the City’s Heritage</p>

Draft EPR section	MTCS comment and recommendation
	Planning Staff and the MHC.
6.7.8 Cultural Environment-Archaeology (p6-2)	The commitments to Future Work must be consistent with those in section 4 of this EPR Addendum. See comments above
6.7.9 Built Heritage and Cultural Landscapes (p 6-1)	<p>1. Use consistent and correct terminology: it should read: “Built Heritage <u>Resources</u> and Cultural <u>Heritage</u> Landscapes”</p> <p>2. The commitments to Future Work must be consistent with those in section 4 of this EPR Addendum. Pls see comments above.</p>

In summary, MTCS requests that prior to issuing the final EPR Addendum:

- a revised Draft EPR Addendum be provided to us reflecting the outcomes of the technical studies (CHERs) currently underway
- the technical studies be provide to us for review and comment when they are completed
- in keeping with MTCS’s advice for all EA projects, technical studies should be provided to municipal Heritage Planning Staff for review and comment
- technical studies should also be made available to the Municipal Heritage Committee upon request. We note Metrolinx’s advice that it will be making a presentation to Hamilton Heritage Committee on March 16th.

As always MTCS is available to discuss its comments and recommendations with Metrolinx staff in greater detail over the telephone or in person. Please feel free to contact me as necessary.

Sincerely

Rosi Zirger
Heritage Planner
416-314-7159
rosi.zirger@ontario.ca

Beau Wansbrough, Project Officer, MOECC
Karla Barboza, Heritage Advisor, MTCS
James Hamilton, Manager, Heritage Programs, MTCS
Don Forbes, Manager, Environmental Programs and Assessment, Metrolinx



**Hamilton Light Rail Transit
Environmental Project Report (EPR) Addendum**

MOECC

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
1.	General Comments	<p>Reading the Addendum it is not clear what was completed in the 2011 TPAP process.</p> <p>Wherever possible explain/summarize the contents of the 2011 EPR instead of only referencing it. It is not an attached document and leaves readers missing critical information.</p>	MOECC	Included 2011 EPR as Appendix A, with summary table of Potential Environmental Condition Changes, Mitigation, Net Effects and Monitoring.
2.	General Comments	Throughout the document there are references to A-line, as indicated through correspondence the A-line is not proceeding and should be removed.	MOECC	Removed
3.	General Comments	The MacNab reconfiguration is not proceeding through this process and therefore any references and sections for them should be provided as context and not part of this undertaking.	MOECC	References to MacNab Terminal were removed from EPR Addendum
4.	General Comments	Provide an ownership map, along with a breakdown of the hectares of property affected.	MOECC	Property requirements are identified in drawings in Appendix B. Measurements will be identified during detailed design process
5.	General Comments	Legends and details should be visible for the reader on all the figures and maps.	MOECC	Drawings enlarged

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
6.	General Comments	Discussion is required related to additional information and commitments to address an approach to potential impacts and mitigation on heritage resources.	MOECC	Impacts on heritage resources added in Table 3-12, mitigation in Table 4-5 Table 4-6; and summary in Table 4-9; commitments added in Section 6.5.12
CHAPTER 1				
7.	1.2	The changes to the project considered significant are listed stating all the items that were not addressed in the Hamilton LRT 2011 EPR, it would be helpful if there was also a summary of what was addressed and approved in the 2011 EPR.	MOECC	Included 2011 EPR as Appendix A, with Summary table of Potential Environmental Condition Changes, Mitigation, Net Effects and Monitoring.
8.	Figure 1-2	When Figure 1-2 is revised to remove the A-line it is recommended to highlight that the Frid Street Extension is related to the Operations, Maintenance and Storage Facility (OMSF) site. This is not clear up front in the document. This could also be addressed in the text.	MOECC	Map feature added
9.	1.3.1	Section 1.3.1 contains a lot of information. This section would benefit from one or several maps indicating detailed areas discussed for the B-line.	MOECC	Map references included
CHAPTER 2				
10.	2.4.1	Section 2.4.1 could also benefit from associated mapping.	MOECC	Map references included
11.	Figure 2-8	Figure 2-8 is too small to see the legend and the details.	MOECC	enlarged
12.	Figure 2-9	Figure 2-9 is also too small to see the details.	MOECC	enlarged

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
CHAPTER 4				
13.	4.6.1	In Section 4.6.1 states that the compensation of existing tree loss and replacement will be specified in the Landscape Plan, developed during the detailed-design phase of the project. MOECC would like to see a commitment in the addendum to compensate tree loss at a net benefit during the detailed design phase.	MOECC	Included commitment, "Wherever possible, tree loss will be compensated at a net benefit during the detailed design phase." within document section 4.6.1 and table 4.12.
14.	Figure 4-11	Figure 4-11 Frid Street Extension Re-alignment - Plan and Profile, incomplete.	MOECC	Figure replaced during revision process
15.	4.8	Section 4.8 Summary of Potential Impacts, Proposed Mitigation Measures, Monitoring and Future Work - is recommended to add a summary of the 2011 TPAP Commitments or provide an appendix with this information.	MOECC	Included. See item #1
CHAPTER 5				
16.	5.11	In Section 5.11 - please include a commitment to inform First Nations communities of any future relevant Stage 1 and Stage 2 Archaeological Assessment findings	MOECC	Included commitment in Section 5.11.
17.	5.2.3	In Section 5.2.3, PIC #2 Responses is left blank.	MOECC	Responses were added following PIC #2
18.	General Comments	The social media section has information missing.	MOECC	Social media section was added following PIC #2
19.	General Comments	Affected property owners section refers to additional meetings that were requested. Please list the additional meetings/concerns raised.	MOECC	Meetings list added to Appendix D
20.	General Comments	Were any comments submitted in writing? Please clarify in Appendix D or in TPAP.	MOECC	Responses are included in Appendix

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
				D – cross-referenced in EPR Addendum in Section 5.2.3
21.	5.7	Section 5.7 describes a meeting with MOECC to discuss the addendum that did not take place.	MOECC	Statement was an error - removed
CHAPTER 6				
22.	6.2	Section 6.2 references the 2011 EPR. This does not help the reader understand the approvals and permits required. Please list and fill out this section accordingly or provide an appendix.	MOECC	2011 EPR included as Appendix A. Comment added to Section 6.2
23.	6.6	Section 6.6 Environmental Disciplines is left blank. This should be completed prior to submitting.	MOECC	Section was restructured to remove this sub-heading – detailed information from each discipline remains
24.	6.6	Section 6.6 is left blank. Future commitments to Environmental Disciplines should be completed.	MOECC	Section was restructured to remove this sub-heading – detailed information from each discipline remains
25.	6.7.9	Commitments to future works related to heritage components should be stated in Section 6.7.9 (i.e. Metrolinx' commitment to protecting heritage properties where possible).	MOECC	Similar statement added – now Section 6.5.12
26.	6.7.9	Section 6.7.9 states "commitments for properties with direct and indirect impacts are currently being identified". At minimum the impacts should be identified at a high level in the TPAP.	MOECC	Commitments to future CHERs and HIAs added – now Section 6.5.12
27.	Air Quality Existing Conditions - Section 2	no mention is made of the increase in particulate concentrations due to re-entrainment as a result of an increase in traffic. Re-entrainment is a significant contributor to overall particulate concentrations, and should be included in the air quality assessment. It is	MOCC	The re-entrainment of road dust was taken into account in the air

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
		unclear if re-entrainment has been accounted for in this assessment so this should be addressed.		quality modelling.
28.	Air Quality Existing Conditions - Section 2	It is unclear how climatic conditions including atmospheric temperature inversions are taken into account in the current report and how they may affect air quality. In the final document, this should be addressed as inversions always occur each summer while tornadoes are less likely.	MOECC	There is no readily-available meteorological data for the Hamilton basis to allow quantitative analysis of the frequency of temperature inversions, which do occur throughout the region and may be more frequent in Hamilton. Note that our modelling used a meteorological data set that included temperature inversions, and it is likely that the predicted worst-case air quality conditions were associated with such conditions. Therefore, the analysis did take temperature inversions into consideration.

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
29.	Air Quality Study Update – Section 2	The implications of the increase in traffic were only addressed for the most significant increase, on Cannon Street between Bay Street and John Street, and this was only done by performing a comparison to another section of road with a similar increase in a previous study. These findings should be made available, or the modelling should be rerun for each of these scenarios in order to validate the conclusion that predicted maximum concentrations are within acceptable ranges for all contaminants, except for benzene and benzo(a)pyrene.	MOECC	The results of the modelling are available in the original AQ Impact Report. For convenience, these results have been summarized and included in the Report Update.
30.	Air Quality Study Update – Section 2	Also, while the elevated levels of these two contaminants are attributed to elevated background levels, in the Existing Conditions report, it is noted that background PM10 levels are above their AAQC as well, yet, in this scenario, it seems they are predicting these levels to be below the applicable AAQC. This requires further explanation.	MOECC	Further explanation to be included in final submission
31.	Air Quality Study Update – Section 2	The third bullet in Section 2 states that the predicted contribution from the roadway at local sensitive impact locations is relatively small (i.e. less than 25% of the background level), but it is not specified what contaminant(s) this refers to.	MOECC	Specific contaminant information to be added
32.	Air Quality Study Update – Section 2	It is also recommended that for the four above-mentioned areas where modelling has predicted an increase in traffic, that mitigation strategies should be considered and implemented, including but not limited to such measures as tree-planting, preferably coniferous vegetation, or another type of mitigation method is used, as appropriate, to act as a screen and provide year-round mitigation to contaminant levels.	MOECC	Mitigation recommendations will be updated in final EPR submission
33.	Air Quality Study Update – Section 2	In addition, the detailed traffic data located in Appendix A, which was used to produce Table 1, does not appear to include buses or truck traffic. It is unclear how the detailed traffic data were obtained.		Traffic data will be clarified in final EPR submission
34.	Air Quality Study Update – Section 3 - OMSF	The operations at the OMSF have the potential to generate air emissions, specifically, particulate matter. The proponents have stated that sufficient information on potential air emissions at the site is not available at this time. The proponents state the facility will be designed to comply with provincial regulations and ensure off-site concentrations of air emissions are below provincial standards, and this must be documented in an ESDM together with an application for an ECA. Modelling results will be	MOECC	Noted

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
		reviewed at this later time, along with proper mitigation and control measures.		

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
		<p>underway. As we have previously advised, the evaluations should consider these properties both individually and within the context of the overall landscape (streetscape).</p> <p>We look forward to receiving the additional technical studies for review when they are completed. Please be aware that we may have additional comments after our review. In addition, we would appreciate being provided with a list and mapping of the properties where building demolition is proposed.</p>		
3.	<p>Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component</p>	<p>Meanwhile, we recommend the Draft EPR Addendum be revised to clearly articulate the extent to which the proposed re-design will result in the likely demolition or significant alteration of cultural heritage resources (CHRs), including built heritage resource and cultural heritage landscapes. Given the extent of proposed building demolitions and for clarity, we suggest including a rationale for re-designed plan and why impacts are unavoidable.</p>	MTCS	<p>Information Available in EPR Addendum Appendix C-11</p>
4.	<p>Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component</p>	<p>the Stage 1 archaeological assessment (AA) completed in 2009 by Archaeological Services Inc. for the B-Line LTR corridor concluded that while the roadways themselves had been previously disturbed and retained no archeological potential, several areas immediately adjacent remain undisturbed and retain archaeological potential. Further archeological assessment (Stage 2 AA and Stage 3 AA if warranted by the Stage 2) is required for those areas. Given the extent of impact outside the right-of way, and consistent with our previous advice, the Draft EPR Addendum must reference the 2009 Stage 1 AA and its recommendations.</p>	MTCS	<p>EPR Addendum amended to include 2009 Stage 1 AA reference</p>
5.	<p>Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component</p>	<p>se be aware that McMaster University is a property designated by the municipality under Part IV of the Ontario Heritage Act (By-Law No.08-002). Property boundaries run immediately adjacent to the public right of ways (including sidewalks) along Main St West and Cootes Drive. This being the case, if any of the McMaster property is to be impacted by the LRT/bus terminal, a Heritage Permit from the City of Hamilton may be required. We suggest that the City of Hamilton's heritage planning staff be contacted and the appropriate revisions made to the Draft EPR Addendum.</p>	MTCS	<p>Noted</p>
6.	<p>Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component</p>	<p>The 2011 approved EPR did not include this grade separation. Metrolinx has advised that based on further review of the potential operational impacts on the LRT and safety risks, and discussions with CP Rail, the decision was made to include the grade separation as part of the EPR Addendum. The 2011 technical heritage study identified properties in the vicinity of the grade separation as being part of streetscape i.e. cultural heritage landscape (CHL 21), but did not anticipate impacts. Metrolinx has advised that evaluations to determine CHVI of these properties are currently underway and we look</p>	MTCS	<p>Noted</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
		forward to receiving them when completed.		
7.	Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component	Archaeology: The 2009 Stage 1 AA for the B-Line identified an area in the vicinity of the Queenston Terminus as retaining archaeological potential. The required archeological assessments (Stage 2 AA and Stage 3 AA if warranted by the Stage 2) must be completed for this area.	MTCS	Noted
8.	Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component	<p>6. Operations, Maintenance and Storage Facility (OMSF) AND 6. Frid Street Extension</p> <p>The preferred location for the OMSF is in the vicinity of Chatham Street and Frid Street east of Longwood Road. This location is near 606 Aberdeen Avenue (former Westinghouse Industrial property). We understand that a Cultural Heritage Evaluation Report (CHER) is being undertaken to determine whether the property has CHVI. Both the results of the CHER and the potential impacts should be included in the EPR Addendum.</p> <ul style="list-style-type: none"> • 	MTCS	Impacts on heritage resources added in Table 3-12, Mitigation in Table 4-5 Table 4-6; Summary in Table 4-9; and Commitments added in Section 6.5.12
9.	Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component	Archaeology: A Stage 1 archaeological assessment was undertaken for the OMSF site. MTCS records indicate that AA report was submitted to the Ministry on February 9, 2017 but we still need to review it. Please be aware that the archaeology review officer may have additional comments when reviewing it.	MTCS	Noted
10.	Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component	The EPR Addendum should clearly state that this AA pertains only to the OMSF site and not to other components of the LTR project.	MTCS	The section was revised to state the Stage 1 AA only pertains to the OMSF.

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
11.	Comments on Key Changes proposed under the draft EPR Addendum and implications for the cultural heritage component	<p>Proposed changes to the MacNab Transit Terminal are to close the MacNab access and to reconfigure the terminal to provide access to or from Main Street and James Street only. Details of the reconfigured terminal are not included in the Draft EPR Addendum.</p> <p>From a cultural heritage perspective every property (building) on the city block bounded by MacNab to the west, King Street West to the north, James Street to the east and Main Street West to the south is either designated by the municipality or included in the City’s Heritage Inventory. Numerous additional properties in the immediate vicinity are also designated or included in the City’s Heritage Inventory. The EPR Addendum should be revised to clearly identify the existing cultural heritage conditions of the MacNab Transit Terminal, and appropriately consider potential impacts, if any.</p>	MTCS	No specific changes to MacNab Terminal are proposed at this time. Changes identified during detailed design phases will be addressed, as appropriate, in a separate EPR Addendum
CHAPTER 1				
12.	1.3.1 Study Area (p1-2)	<p>The Addendum Study Area is divided into three areas where physical changes are proposed, yet five section areas are listed.</p> <p>Please clarify and revise accordingly.</p>	MTCS	Descriptions were revised to be consistent throughout EPR – B-Line Alignment, Terminals, and OMSF
CHAPTER 2				
13.	2.0 Update to Project Description (p 2-2 to 2-10)	<p>The Addendum Study Area is divided into three areas where physical changes are proposed, yet five section areas are listed.</p> <p>Section 2.0 (see below) describes at least 9 key components.</p> <p>Further to our comment on section 1.3.1, for clarity and readability the project components should be consistent throughout the EPR Addendum. Section 2.0 describes the following key components:</p> <ol style="list-style-type: none"> 1. B-Line 2. A-Line (Removed from this project) 3. McMaster University Terminal 4. CP Rail Crossing 5. Queenston Terminus 	MTCS	Chapter 2 was restructured to be consistent with Chapter 1

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
		6. MacNab (Terminal) Reconfiguration 7. High-Order Pedestrian Connection to Hamilton GO Centre 8. Operations, Maintenance and Storage Facility (OMSF) 9. Frid Street Extension Please clarify and revise accordingly.		
14.	2.3 “Rapid, Reliable and Safe” Design Approach (p2-1 to 2-2)	<p>The last two bullet points (top of p 2-2) refer to a “need for land and property acquisition” to accommodate platforms and turn lanes.</p> <p>The Draft EPR Addendum should clearly state where the proposed project design will result in demolition of buildings.</p>	MTCS	<p>The following comment was added “At the right-in/right-out side street intersections, turns have to be made from and to the curbside lane on King/Main Street. This in turn requires some street corners to be cut back to allow access by garbage collection vehicles, EMS vehicles , and school buses. In some cases, this requires land and property acquisition.” Associated land requirements are described in Section 3 and Section 4.</p>
CHAPTER 3				

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
15.	3.3 Cultural Environment General Comments	For readability and clarity we suggest dividing into appropriate subheadings to address each of the study area sections (see 1.3.1 Study Area (p1-2) and or section 2.0)	MTCS	Resource addresses are grouped together under subheadings which divide the corridor.
16.	3.3 Cultural Environment General Comments	Since B-Line is a lengthy corridor it could be further divided into smaller segments. For clarity and readability maps showing the cultural heritage resources in relation to the corridor could be attached.	MTCS	Resources addresses are grouped together under subheadings which divide up the corridor. The technical reports within the appendices include maps that highlight the cultural heritage resource in relation to the corridor.
17.	3.3 Cultural Environment General Comments	The existing cultural heritage conditions include all recognized, designated, identified (e.g. "listed") properties, as well as those identified by the previous (2011) and current (2016) technical studies which are currently being undertaken.	MTCS	Noted
18.	3.3 Cultural Environment General Comments	The CHSR provides only "raw data". The EPR Addendum must include the results of the CHERS that are currently being undertaken.	MTCS	Results of the CHERs undertaken are included within Table 3-11, 4-9 and 4-10.
19.	3.3.1 Archaeological Resources (p 3-26)	Refers ONLY to the Dec 2016 Stage 1 AA. for the OMSF site. In fact two previous Stage 1 AA undertaken for B-Line and A-Line. All AA reports, their outcomes and recommendations must be referenced (usually stated in the Executive Summary). NOTE: the Stage 1 AA for the B-Line recommended a Stage 2 AA in identified areas.	MTCS	Three Stage 1 AA's were previously undertaken, including 2009, 2012 and 2013 reports.

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
				<p>The 2012 report covers the A-Line, which is no longer part of the EPR Addendum scope.</p> <p>The 2013 report was for a previous OMSF site with associated spur, roughly near Barton St E. and Wentworth St. N. The entire area was identified to have no archaeological potential.</p> <p>The 2009 findings are summarized within the EPR Addendum. However, the EPR Addendum is intended to cover new scope.</p> <p>Previous study references include,</p> <p>(2009) Stage 1 Archaeological</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
				<p>Assessment Rapid Transit Initiative, City of Hamilton, Ontario. [P264-077-2009],</p> <p>(2012) Stage 1 Archaeological Assessment Background Study and Property Inspection Hamilton Rapid Transit A-Line City of Hamilton, Ontario. [P057-654-2010 and P094-109-2011].</p> <p>(2013) Stage 1 Archaeological Assessment, Stage 1 Background Study and Property Inspection, Hamilton RT B-Line Maintenance and Storage Facility and Associated Spur Line Corridor, Class Environmental Assessment Study, Former Township of Barton, Wentworth</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
				County, City of Hamilton, Ontario. [P094-160-2012].
20.	3.3.1 Archaeological Resources	The information included in this section is largely the research and historical background portion from the Stage 1 AA report. While it is required in the AA it does not address the existing conditions of the study area. The pertinent details of the AA are usually captured in the Executive Summary.	MTCS	Removed research and historical background.
21.	3.3.1 Archaeological Resources	<p>For readability and clarity we suggest deleting the current text, and including only the salient portions of the technical studies as it relates to the project, including:</p> <ul style="list-style-type: none"> • study undertaken – who, when, why • results (Areas of potential?) • recommendations (further AA or not) <p>We offer the following sample text: <i>“A Stage 1 AA was undertaken on [date] by [consultant archaeologist] for [state property]. A Stage 1 AA consists of . . . and its purpose is to identify areas of archaeological potential and further archaeological assessment (e.g. Stage 2-4) as necessary.”</i></p> <p>Then include the outcomes and recommendations of the report (e.g. as in Executive Summary)</p>	MTCS	This information was reorganized within the section to reflect the proposed structure.
22.	3.3.2 Built Heritage and Cultural Heritage Landscapes (p 3.29)	For readability and clarity, we suggest dividing this section into subheadings to address each of the study area section areas (see 1.3.1 Study Area (p1-2)). Since B-line corridor is lengthy, it should be further sub-divided into readable sections. A map would help to add clarity.	MTCS	Resource addresses are grouped together under subheadings which divide up the corridor.
23.		Under the TPAP, protected heritage properties, built heritage resources and cultural heritage landscapes i.e. properties that have been evaluated using the criteria in Ontario Regulation 9/06 and 10/06 and that have determined to have cultural heritage value or interest. We understand that additional evaluations are currently being undertaken. The results of these technical studies must be included in the EPR Addendum.	MTCS	The results are populated within Table-3-11: Summary of the Cultural Heritage Existing Conditions.

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
24.		<p>The existing cultural heritage conditions of each study section areas, even they will not be impacted by the proposed project. For example, the proposed GO High- Order Pedestrian Connection which extends along Hughson St from the Hamilton Centre GO Station to King Street is flanked by designated and listed properties. This is also the case for the MacNab Bus Terminal</p>	MTCS	<p>The following statement will be added to the EPR Addendum to characterize the heritage value of Hughson Street.</p> <p>"Hughson Street was created as a right-of-way in 1835, named after Nathaniel Hughson, an entrepreneur who settled at Hamilton in the early nineteenth century. The street is highly altered from its nineteenth and early twentieth-century appearance, with only a small number of heritage buildings remaining. However, the street retains significant historical fabric, such as the Art Deco GO Transit Centre, the Right House, and LIUNA Station. The conservation of existing fabric has</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
				<p>ensured the maintenance of the unique character of Hughson Street.</p> <p>Source: City of Hamilton, <i>Hughson Street Master Plan</i> (2015)</p>
25.		<p>Similar to the comments above for archaeological resources, this section should be revised to include ONLY the salient data/information from the technical studies. It is not necessary to reproduce report in full since it is appended to the EPR Addendum. Instead, we suggest the introductory paragraph or two referring to the technical studies that were done, when, by whom and their purpose. As we have stated the results of the CHER must be included.</p>	MTCS	<p>Introductory paragraphs include a description of the process and studies conducted and the remaining information includes the results of CHERs.</p>
26.	Screening Outcomes (p 3-37)	<p>Under the TPAP, the EPR Addendum must identify properties with cultural heritage value or interest, regardless of ownership. The four categories of possible outcomes reflect a Metrolinx internal Interim Heritage Management process. It does not address the TPAP. If these categories are to remain in the EPR Addendum, we suggest including a description of what they mean. For example,</p> <ul style="list-style-type: none"> • “potential PHP” is a property owned by Metrolinx that has potential CHVI; • “conditional HP” is a property that has potential CHVI, not currently owned by MX, but may be acquired by MX as a result of the project; • “Adjacent Lands” are recognized and/or protected heritage properties that adjoin the study area corridor but that will not be impacted by the project [you may want to add a sentence explaining why this is important to identify]; • “Non-Heritage Property” is a property identified in the screening but one that does not meet any screening criteria 	MTCS	<p>Impacts on heritage resources added in Table 3-12, Mitigation in Table 4-5 Table 4-6; Summary in Table 4-9; and Commitments added in Section 6.5.12</p>
27.	3.3.3 Cultural Heritage Evaluations	<p>We suggest adding a paragraph to explain the basis for determining which properties are evaluated [it seems that not all properties meeting the screening criteria (with potential CHVI) are evaluated]. This</p>	MTCS	<p>Methodology section added in Section</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
	(p 3-37) *****	section could also tie in any difference/discrepancies/gaps between the CHSR and the 2011 CH report.		3.3.2
28.		When available, only a summary of the outcome of the evaluation should be included. For example, <i>“606 Aberdeen Ave was evaluated and determined to have CHVI (or not, as the case may be). The results of the evaluation were confirmed by the MX Heritage Committee on [date] and a Decision Form . . .”</i>	MTCS	Tables 3-12, 4-5 and 4-6 include summary statements only
29.	606 Aberdeen Ave (p 3-38)	<p>Include only the outcome of the evaluation, e.g. <i>606 Aberdeen Ave was determined to have CHVI under O. Reg 9/06 (or 10/06 as the case may be). As MX Heritage Committee has reviewed the CHER and confirmed the evaluation on [date]</i></p> <p>2. Community Interest–states “Engagement to consider opinion of the subject site. . . .” It is not clear what this section is intended to address please clarify and/or re-word as necessary.</p> <p>3. the last paragraph states: “The research and analysis for this property as a basis for evaluating the site’s potential heritage significance has demonstrated through limited municipal and community engagement that the property is considered to hold significant heritage value.</p> <p>a) The meaning/intention of the sentence is not clear. Please clarify.</p> <p>b) Use terminology that is consistent with the OHA, Provincial S&Gs, PPS etc. For example:</p> <ul style="list-style-type: none"> • Use the term “property” instead of “site” • Use “potential cultural heritage value or interest” instead of “potential heritage significance” • Use by “cultural heritage value or interest” instead of “significant heritage value” <p>Note: In the Provincial S&GS context the term “significance”</p>	MTCS	Summary statement included in tables 3-12, 4-5 and 4-6
30.	List of properties being evaluated (p 3-38)	This list is also on p 3-37. Likely an editing/drafting error	MTCS	Section revised to include complete list of properties, once, in Table 3-12
31.	Table 3-15 Approved One-way conversions . . (3-38)	It looks like this table should be moved to a different section of the report. It is not related to Heritage	MTCS	Text relocated to Section 3.4
CHAPTER 4				
32.	4.4 Cultural Environment (p 4-12 to 4-24)	<p>General comment</p> <p>1. For clarify and readability we recommend that this section be divided by subheading to address the</p>	MTCS	Noted

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
		<p>varying impacts for different study area sections.</p> <p>2. Overall the purpose of this section is to identify potential project impacts to the cultural heritage environment, and state how those impacts will be avoided or mitigated.</p> <p>This section should clearly describe and articulate the potential project impacts. For example, it seems that some sections of the B-Line corridor will result in the demolition of a number of buildings adjacent to one another and on the same city block. Other sections, such as the B-Line through the “International Village” will result in no impacts outside the existing roadway. Perhaps the Draft EPR Addendum can address the different designs being proposed.</p>		
33.	<p>4.4.1 Archaeology (p 4-12) Paragraph 1.</p>	<p>Reference to the AA report should be in the body of the report and not as a footnote.</p>	MTCS	<p>This structure is used consistently throughout the EPR Addendum – each technical report completed and included in the Appendix has a full citation included as a footnote to the section where the work is referenced.</p> <p>The AA report references have also been included within the body of the report.</p>
34.	<p>4.4.1 Archaeology</p>	<p>There are three Stage 1 AA reports for this TPAP. The current EPR Addendum refers only to the Stage 1 AA completed in 2016 for the OMSF. The OMSF site does not require further AA.</p> <p>Stage 1 AA for A-Line (ASI 2012) – identified archaeological potential within the sturdy corridor, and recommended Stage 2 and possibly Stage 3, for identified areas.</p> <p>Stage 1 AA for B-Line (ASI 2009) – identified archaeological potential and recommended Stage 2 for</p>	MTCS	<p>Appendix A contains the 2011 EPR document and commitments table for reference. The 2011 EPR commitments remain</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
		<p>identified areas.</p> <p>FYI –each Stage 1 AA includes a map that shows areas of potential being the areas where further AA (i.e. Stage 2 or more) is required. Suggest attaching the maps to the EPR Addendum.</p>		in effect. The EPR Addendum includes new commitments for areas not previously studied.
35.	Construction/Operations Impact	<p>The text must reflect the specific outcomes and recommendations of each Stage 1 AA. This information is typically included in the Executive Summary.</p> <p>As suggested in the previous comment, include the AA map in the EPR Addendum.</p>	MTCS	<p>See previous response to Item #34.</p> <p>Maps are included in new Appendix C-10 (a) and referenced within EPR Section 3, Existing Conditions.</p>
36.	Mitigation Measures and Net Effects	<p>The current is the standard general commitment for “accidental” finds. This text should remain in the EPR Addendum. However, it does not take the place of specific mitigation measures and net effects. The specific outcomes and recommendations of each AA must also be included (see previous comment).</p>	MTCS	See previous response to Item #34.
37.	Monitoring/Future Work	<p>This sections states, “<i>During construction, a licensed archaeologist should be on site to monitor earthworks in areas exhibiting archaeological potential</i>”.</p> <p>1. Commitment for future work must be specific and be consistent with the recommendation in the archaeological report. Monitoring during construction is rarely recommended and then only in specific instances.</p> <p>2. MTCS’s advice is to complete all required AA (Stage 2 and Stage 3 if recommended by the Stage 2AA) as early as possible in the planning stages of projects. We understand that in some cases MX may not have Permission to Enter onto privately owned properties, but as we have previously advised, best efforts should be made to complete additional stages of AA. Waiting until construction to address archaeological concerns (as with monitoring) can result in costly delays to your construction schedule.</p> <p>3. Commitments for future work must be specific, consistent with the recommendations of the AA reports, and include a specified time frame for completion.</p>	MTCS	<p>Noted</p> <p>Noted</p> <p>Noted</p>
38.	4.4.2 Built Heritage and Cultural Landscapes (p4-12 to)	<p>For consistency and accuracy, change title to Built Heritage and Cultural Heritage Landscapes. Ideally, titles for Section 3.3.3 and 4.4.2 should read: “Built Heritage Resources and Cultural Heritage Landscapes”</p>	MTCS	All instances revised as directed

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
39.	4.4.2 Built Heritage and Cultural Landscapes Paragraph 1 and 2	Similar to comments above for Archaeological Resources reports referenced should be included and described in the body of the report and not as a footnote.	MTCS	All technical reports for each discipline were described within the body of the report and a footnote was included with the proper document citation.
40.	4.4.2 Built Heritage and Cultural Landscapes Paragraph 1 and 2	In addition to the CHSR, two previous cultural heritage reports, one for B-Line and one for A-Line were completed in 2011. The EPR Addendum must be clear about the information and address possibly inconsistencies between the reports.	MTCS	Previous cultural heritage reports were reviewed during the preparation of the 2017 CHSR (ASI), contained within the EPR Addendum appendices. The EPR Addendum is intended to present the main findings for new scope.
41.	Construction/Operation Impacts	<p>The EPR Addendum must describe anticipated impacts of the project, in general and describe the anticipated impacts to the identified cultural heritage resources (CHR).</p> <p>Suggest a general introductory paragraph describing general impacts, then a table/chart describing specifically anticipated impacts to each identified CHR.</p> <p>For example, it could say something like, <i>"In some sections of B-Line [specify which sections] the proposed design is a centre LRT with traffic lanes. This will require the existing roadway to be widened by xxx feet/meters and will require the removal/demolition of buildings etc.</i></p>	MTCS	Direct and indirect impacts are described for all properties

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
		<i>For A-Line along James St N the LRT has been designed . . .to ensure only the existing roadway will be impacted etc.”</i>		All references to A-Line are removed from the EPR Addendum.
42.	Mitigation Measures and Net Effects	While the high-level statements in this section can remain, they do not take the place of specific mitigation measures that must be included to address each identified CHR.	MTCS	Detail included in Table 4-5 and 4-6. Heritage Impact Assessments will be prepared during detailed design.
43.	Monitoring/Future Work	<p>This section states: <i>“Based on the results of vibration studies, appropriate conservation plans should be developed, including but not limited to building/and or façade stabilization measures or development of appropriate setbacks”.</i></p> <p>This is not an appropriate commitment for future work. Vibration effects/damage are just one possible (negative) impact to a CHR. The EPR Addendum must describe all possible impacts to CHRs, and consider and describe appropriate and specific mitigation measures.</p>	MTCS	<p>This commitment has been removed.</p> <p>Where Cultural Heritage Evaluation Reports have determined significant cultural heritage resources, Heritage Impact Assessments (HIA) will be prepared.</p> <p>The HIA(s) will detail specific mitigation measures according to project impacts, determined during detailed design.</p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
44.	Table 4-5: B-Line LRT Corridor Screening Outcomes (p4-13 to 4-23)	The EPR should provide outcomes of the cultural heritage evaluations.		Outcomes of the CHERs added to Table 4-5 and 4-6
45.	Cultural Heritage Screening	Appears to be duplication of 3.3.3 and in any event out of place in the Impacts section of the EPR Addendum. Suggest removing it.	MTCS	Removed.
46.	Direct Impacts and Mitigation Measures (p4-23)	No information provided	MTCS	Preliminary information removed and completed information included in Table 4-5 and 4-6
47.	Indirect Impacts and Mitigation Measures (p 4-24)	No information provided	MTCS	Preliminary information removed and completed information included in Table 4-5 and 4-6
48.	Summary of Potential Impacts and Mitigation Measures (p 4-24)	No information provided Given to number of properties and the amount of information, you might consider having only two tables, one for Direct Impacts and the other for Indirect Impacts, but including the four column headings of the Summary table.	MTCS	Preliminary information removed and completed information included in Table 4-5 and 4-6 Tables structured with geographical sections
49.	Summary of Potential Impacts and Mitigation Measures (p 4-24)	Under the Summary heading you could include a paragraph or two of commitments.	MTCS	Included in Chapter 6
CHAPTER 5				
50.	5.2.2 Public Open House and Online Consultation	<i>The focus of PIC #2 was to identify modifications to the present the environmental effects of the proposed changes to the project and proposed mitigation.</i>	noted	Noted

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
	#2 (5-2)	Since the PIC has already taken place and another is not planned for this project, we are not providing specific comment at this time. However, we would like to work with Metrolinx to develop language for PIC/consultation presentations for future projects to address the cultural heritage component of the TPAP.		
CHAPTER 6				
51.	Table of Contents (p 6-1)	Please use correct and consistent terminology. Change title to “Built Heritage <u>Resources</u> and Cultural <u>Heritage</u> Landscapes”	MTCS	All instances revised as directed
52.	6.4 Property Acquisition (p 6-1)	This section states, “. . . <i>The preliminary property requirements will also be confirmed during the detailed-design phase of the study</i> ” Some of the properties being acquired have been identified as potential CHRs, and in some cases buildings/structures on those properties will be demolished. The extent of acquisition for those properties must be identified during the TPAP, or there must be a clear commitment to inform and consult with MTCS, the City’s Heritage Planning Staff and the MHC.	MTCS	Impacts on heritage resources added in Table 3-12, Mitigation in Table 4-5 Table 4-6; Summary in Table 4-9; and Commitments added in Section 6.5.12
53.	6.7.8 Cultural Environment-Archaeology (p6-2)	The commitments to Future Work must be consistent with those in section 4 of this EPR Addendum. See comments above	MTCS	Amended
54.	6.7.9 Built Heritage and Cultural Landscapes (p 6-1)	Use consistent and correct terminology: it should read: “Built Heritage <u>Resources</u> and Cultural <u>Heritage</u> Landscapes”	MTCS	All instances revised as directed
55.	Summary Comments	a revised Draft EPR Addendum be provided to us reflecting the outcomes of the technical studies (CHERs) currently underway	MTCS	All CHERs results included in revised EPR Addendum; CHERs in Appendix C
56.		the technical studies be provide to us for review and comment when they are completed	MTCS	All CHERs results included in revised EPR Addendum; CHERs in Appendix C

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
57.		in keeping with MTCS's advice for all EA projects, technical studies should be provided to municipal Heritage Planning Staff for review and comment	MTCS	Noted
58.		technical studies should also be made available to the Municipal Heritage Committee upon request.	MTCS	Noted



**Hamilton Light Rail Transit
Environmental Project Report (EPR) Addendum**

HCA

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
1.	General Comments	<p>Our main area of concern in this regard is the proposed Operations Maintenance and Storage Facility. The EPR Addendum details that the proposed development on the site will be located outside of the HCA regulated area, however, the scale of the mapping makes it difficult to determine the extent of the development proposed and if there is any potential impact to the buried watercourse in this area.</p> <p>As part of the next steps in this project, HCA staff would request that we be circulated the detailed design for this area and supporting reports (e.g. stormwater management plan).</p>	HCA	<p>Included the following text, within Section 4.2.7 and Table 4-7 Summary of Potential Environmental Condition Changes, Mitigation, Net Effects and Monitoring, <i>“During the development of the stormwater management plan and detailed-design, the Hamilton Conservation Authority (HCA) should be consulted; in order to review proximity and potential impacts to buried watercourse at the OMSF location.”</i></p>

MNRF

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
1.	General Comments	In order to minimize disturbance to barn swallows that are assumed to be nesting in the adjacent Canadian Drawn Steel Company buildings and that were observed foraging within the OMSF lands, it is recommended that site alterations within the suitable foraging areas of the subject lands be scheduled to avoid critical times when the barn swallow are carrying out key life processes relating to breeding, nesting and rearing. The period of greatest energy demand for a swallow is during nestling rearing. This barn swallow active season usually starts around the beginning of May and ends around the end of August.	MNRF	See response to item #3.
2.	General Comments	As noted within the Draft EPR Addendum, MNRF should be contacted directly to discuss threatened, endangered or extirpated species protected under the ESA that are observed within the limits of disturbance to ensure that activities remain compliant with the Act. Furthermore, the Ministry encourages you to report all sightings of rare species (animals and plants), natural and wildlife concentration areas in Ontario to the Natural Heritage Information Centre (NHIC). It would be appreciated if you could report the sightings of butternut, chimney swift, and barn swallow using the Rare Species Reporting Form to the NHIC. For information on how to report these sightings, please refer to the following website; https://www.ontario.ca/page/report-rare-species-animals-and-plants .	MNRF	Included within Section 4.2.4 <i>Monitoring/Future Work, and table 4-7 Summary of Potential Environmental Condition Changes, Mitigation, Net Effects and Monitoring.</i> <i>“MNRF should be contacted directly to discuss threatened, endangered or extirpated species protected under the ESA that are observed within the limits of disturbance to ensure that activities remain compliant with the Act. Furthermore, the Ministry requests reporting all sightings of rare species (animals and plants), natural and wildlife concentration areas in Ontario to the Natural Heritage Information Centre (NHIC), using the Rare Species Reporting Form to the NHIC. For information on how to report these sightings, please refer to the following website; https://www.ontario.ca/page/report-rare-species-animals-and-plants.”</i>

CHAPTER 6

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
3.	Section 6.2 Potential Permitting Requirements	“Three species listed under the Ontario Endangered Species Act list have been identified to have either known sightings or habitat in and in close proximity to the proposed study area. These species include; Butternut, Chimney Swift and Little Brown Myotis.” MNRF staff note that Barn Swallow (threatened) should also be included in this list as it was documented foraging within the OMSF lands, and potentially nesting within the adjacent Canadian Drawn Steel Company buildings.	MNRF	<p>Included text within section 6.7.3, Commitments to Future Work, “A <i>detailed Species at Risk assessment should be undertaken during the detailed-design component of the study for Chimney Swift and Bats and Barn Swallows.</i>”</p> <p><u>Barn Swallows</u></p> <p><i>“In order to minimize disturbance to barn swallows it is recommended that site alterations within the suitable foraging areas of the OMSF lands be scheduled to avoid critical times when the barn swallow are carrying out key life processes relating to breeding, nesting and rearing. This barn swallow active season usually starts around the beginning of May and ends around the end of August.”</i></p>
4.	6.7.2 Vegetation and Vegetation Communities	Section 6.7.2 of the Draft EPR Addendum notes that a “focused butternut/health assessment survey should be conducted as part of the tree inventory during detailed-design.” A targeted butternut/health assessment survey is strongly recommended to ensure that the proposed undertaking will not contravene the Endangered Species Act, 2007 (ESA). The assessment survey should include the vegetative areas of the OMSF and Cathedral Park, in addition to other treed areas within the influence zone of construction. MNRF staff suggests that the survey area includes suitable vegetative areas located within a minimum of a 50 m setback from the limits of disturbance.	MNRF	<p>Included the following language within the Table 4-7 Summary of Potential Environmental Condition Changes, Mitigation, Net Effects and Monitoring.</p> <p><i>“It is recommended that the tree inventory (AECOM, 2017) and assessment of all trees that are to be affected by the proposed work be reviewed during detail design, including a focused Butternut/health assessment.”</i></p> <p><i>“The Butternut assessment survey should include the vegetative areas of the OMSF and Cathedral Park, in addition to other treed areas within the influence zone of construction, and the survey area includes suitable vegetative areas located within a minimum of a 50 m setback from the limits of disturbance.”</i></p>

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
5.	6.7.3 Wildlife and Wildlife Habitat	Section 6.7.3 of the Draft EPR Addendum notes that a “detailed Species at Risk assessment should be undertaken during the detailed-design component of the study for Chimney Swift and Bats.” The Ministry strongly recommends targeted species at risk surveys for chimney swift and bats if the activities associated with the proposed undertaking have the potential to impact any of these species or their habitat (e.g. building removal). A management biologist at the local MNRF district office should be contacted prior to undertaking bat surveys to ensure that they align with our most recent district approved survey protocols. You may contact David Denyes, Management Biologist out of the Guelph District Vineland office by email at David.Denyesh@ontario.ca.	MNRF	Included commitment within section 4.2.4 and 6.7.3 <i>“A management biologist at the local MNRF district office should be contacted prior to undertaking bat surveys to ensure that they align with the most recent district approved survey protocols. David Denyes, is the current Management Biologist out of the Guelph District Vineland office and can be reached by email at David.Denyesh@ontario.ca.”</i>



**Hamilton Light Rail Transit
Environmental Project Report (EPR) Addendum**

MTO

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
1.		<p>The 'Appendix A Plan and Profile with Cross-Sections' has an updated fly over drawing from 2016 of the proposed new structure, but doesn't show the base plan of the 403 underneath.</p> <p>A clear plan & cross sections of the new bridges are required in order to make more accurate comments.</p>	MTO	To be provided by AECOM/Metrolinx from RCD / PSOS documents – detail not included in EPR
2.		The only drawings I can find that show the new 'line B' bridge crossing the 403 are in Appendix F, the plan and profile drawings from 2011. They do show the pier locations and you can approximate the span distances based on the chainage, but the angled piers are not in alignment with our roadway	MTO	To be provided by AECOM/Metrolinx from RCD / PSOS documents – detail not included in EPR
3.		A3.Appendix-A.2-Plan-and-Profiles-sheets-1-11 Are these the most up to date drawings?	MTO	Updated drawings included in Appendix B. Additional drawings to be provided by AECOM/Metrolinx from RCD / PSOS documents – detail not included in EPR

#	ITEM	COMMENTS	SUBMITTED BY	SDG RESPONSE
4.		Please provide the structural GA drawings of the proposed new and reconstructed structures for MTO review.	MTO	To be provided by AECOM/Metrolinx from RCD / PSOS documents – detail not included in EPR

January 30, 2017

Attention: Ms. J. Knox
Project Manager, Ontario Region
Canadian Environmental Assessment Agency
Ontario Regional Office
55 St. Clair Avenue East, Room 907
Toronto, ON M4T 1M2

Re: Hamilton Light Rail Transit (LRT) Project – Request for Information

In response to your letter dated December 23, 2016, requesting additional information regarding the nature of the proposed Operations, Maintenance and Strage Facility (OMSF) for the Hamilton LRT project, we are plased to provide the following information:

- The proposed facility is a new construction and function on the site.
- The site is located on property in the vicinity and south of the intersection of Chatham Street and Frid Street, and comprises approximately 65,963m².
- The facility and site are sized and designed to accommodate long-term expansion of the LRT service to Eastgate Square. This capacity is expected to be sufficient to meet needs beyond the 2041 planning horizon for the service.
- The current preferred design includes:
 - Two access tracks connecting to the main line LRT corridor on Main Street West;
 - Six tracks inside the main service building;
 - One test track; and,
 - 14 outside storage tracks.
- Based on the current design, the anticipated total track length is 4,579m.

We trust this provides the information you require. If you require any additional information, please feel free to contact us.

Sincerely,



Paul Johnson
Director, LRT Project Coordination
Light Rail Transit Office | City of Hamilton
T: 905.546.2424 x6396 | C: 905.977.7458
paul.johnson@hamilton.ca



Andrew Hope
Director, Hamilton Light Rail Transit
Rapid Transit | Capital Projects Group | Metrolinx
T: 416.202.4621 | C: 647.938.9954
andrew.hope@metrolinx.com

January 6, 2017

Response to EA Notice

Thank you for providing Infrastructure Ontario (IO) with a copy of your Environmental Assessment Notice. From the information you have provided, it is unclear if you are proposing to use lands under the control of the Ministry of Infrastructure (MOI lands) to support your proposed project.

Prior to MOI consenting to the use of MOI lands, the applicable environmental assessment, duty to consult Aboriginal peoples (if triggered) and heritage obligations will need to be met. In order for MOI to allow you access to MOI lands and to carry out proposed activities, MOI must ensure that provincial requirements and due diligence obligations are satisfied. These requirements are in addition to any such obligations you as the proponent of the project may have.

You as the proponent of the project will be required to work with Infrastructure Ontario (IO) to fulfill MOI's obligations which may include considering the use of any MOI lands as part of your individual environmental assessment. All costs associated with meeting MOI's obligations will be the responsibility of the proponent. Please note that time should be allocated in your project timelines for MOI to ensure that its obligations have been met and to secure any required internal government approvals required to allow for the use of the MOI lands for your proposed project.

In order for MOI and IO to assist you to meet your required project timelines, please recognize that early, direct contact with IO is imperative. The due diligence required prior to the use of MOI lands for your proposed project, may include but may not be limited to the following:

- Procedural aspects of the Provincial Crown's Aboriginal Duty to Consult obligations – see *Instruction Note 1*
- Requirements of the MOI Public Work Class Environmental Assessment – see *Instruction Note 2*
- Requirements of the Ministry of Tourism Culture and Sport (MTCS) Standards and Guidelines for Consultant Archaeologists– see *Instruction Note 3*
- Requirements of the MTCS Standards and Guidelines for the Conservation of Provincial Heritage Properties Consultant Archaeologists – see *Instruction Note 4*

Representatives from IO are available to discuss your proposed project, the potential need for MOI lands and the corresponding provincial requirements and due diligence obligations.

Please review the attached instruction notes which provide greater detail on the due diligence obligations associated with the use of MOI lands for your proposed project. We are providing this information to allow you as the proponent to allocate adequate time and funding into your project schedule and budgets. If your project requires you to study MOI lands, then an agreement is required and all studies undertaken on MOI lands will be considered confidential until approval is received. IO will require electronic copies of all required studies on MOI lands that you undertake.

We strongly encourage you to work with IO as early as possible in your process to identify if any MOI lands would be required for your proposed project. Please note that on title MOI control may

be identified under the name of MOI or one of its predecessor ministries or agencies which may include but is not limited to variations of the following: Her Majesty the Queen/King, Hydro One, MBS, MEI, MEDEI, MGS, MOI, OLC, ORC, PIR or Ministry of Public Works¹.

Please provide Rita Kelly with a confirmation in writing of any MOI lands that you propose to use for your proposed project and why the lands are required along with a copy of a title search for the MOI lands.

For more information concerning the identification of MOI lands in your study area or the process for acquiring access to or an interest in MOI lands, please contact:

Rita Kelly
Project Manager
Land Transactions, Hydro Corridors & Public Works
Infrastructure Ontario
1 Dundas Street West, Suite 2000
Toronto, ON
M5G 2L5
Tel: (416) 212-4934
Email: rita.kelly@infrastructureontario.ca

An application package and requirements checklist is attached for your reference. Please note that transfer of an interest in MOI lands to a proponent can take up to one year and there is no certainty that approval will be obtained.

For more information concerning the MOI Public Work Class Environmental Assessment process and due diligence requirements, please contact:

Lisa Myslicki
Environmental Specialist
Infrastructure Ontario
1 Dundas Street West, Suite 2000
Toronto, ON
M5G 2L5
Tel: (416) 557-3116
Email: lisa.myslicki@infrastructureontario.ca

¹ MBS - Management Board Secretariat; MEI - Ministry of Energy and Infrastructure; MEDEI – Ministry of Economic Development, Employment and Infrastructure; MGS - Ministry of Government Services; MOI - Ministry of Infrastructure; OLC - Ontario Lands Corporation; ORC - Ontario Realty Corporation; PIR - Ministry of Public Infrastructure Renewal

If MOI lands are not to be impacted by the proposed project, please provide a confirmation in writing to Infrastructure Ontario.

Thank you for the opportunity to provide initial comments on your proposed project.

Sincerely,

Patrick Grace
Director
Land Transactions, Hydro Corridors & Public Works
Infrastructure Ontario
1 Dundas Street West, Suite 2000
Toronto, ON, M5G 2L5

INSTRUCTION NOTE 1

Provincial Crown's Aboriginal Duty to Consult obligations

The Crown has a constitutional Duty to Consult (DTC) in certain circumstances and Aboriginal consultation may be required prior to MOI granting access to MOI lands or undertaking other activities. The requirement for Aboriginal consultation may be triggered given Aboriginal or treaty rights, established consultation or notification protocols, government policy and/or program decisions, archaeological potential or results, and/or cultural heritage consultation obligations. The requirement for Aboriginal consultation will be assessed by MOI.

Prior to the use of MOI lands, MOI must first meet any duty to consult obligations that may be triggered by the proposed use of MOI lands. It is incumbent on you to consult with IO as early in the process as possible once you have confirmed that MOI lands would be involved.

MOI will evaluate the potential impact of your proposed project on Aboriginal and treaty rights. MOI may assess that the Crown's Duty to Consult (DTC) requires consultation of Aboriginal communities. Proponents should discuss with IO whether MOI will require consultation to occur and if so, which communities should be consulted.

Where MOI determines that Aboriginal consultation is required, MOI will formally ask you to consult or continue to consult with Aboriginal peoples at the direction of MOI.

On behalf of MOI you will also be required to:

1. Maintain a record and document all notices and engagement activities, including telephone calls and/or meetings;
2. Provide the Ministry updates on these activities as requested; and
3. Notify the Ministry of any issues raised by Aboriginal communities.

If consultation has already occurred, IO strongly encourages you to provide complete Aboriginal consultation documentation to IO as soon as possible. This documentation should include all notices and engagement activities, including telephone calls and/or meetings.

Any duty to consult obligations must be met prior to publically releasing the Notice of Completion for the assessment undertaken under the MOI PW Class EA.

INSTRUCTION NOTE 2

Requirements of the MOI Public Work Class Environmental Assessment

MOI has an approved Class EA (the Ministry of Infrastructure Public Work Class Environmental Assessment (Public Work Class EA) to assesses undertakings that affect MOI lands including disposing of an interest in land or site development. Details on the Public Work Class EA can be found at:

<http://www.infrastructureontario.ca/Templates/Buildings.aspx?id=2147490336&langtype=1033>

You may be required to work with IO to complete an environmental assessment under the Public Work Class EA for the undertakings related to MOI lands. IO will work with you to ensure that all of the MOI undertakings or activities related to the use of MOI lands are identified, that the appropriate Category of undertaking is used and a monitoring and report back mechanism is established to ensure that MOI's obligations are met.

The completion of another environmental assessment process that assesses the undertakings related to MOI lands may satisfy MOI's obligations under the Public Work Class EA. You will be required to work with IO to determine the most appropriate approach to meeting the Public Work Class EA obligations for undertakings related to MOI lands on a case by case basis.

Where it is decided that the assessment of undertakings related to MOI lands can be assessed as part of the environmental assessment being undertaken by the proponent then it is likely that the following provisions will be required:

- that the environmental assessment documents set out that one process will be relied on by both the proponent and MOI to evaluate their respective undertakings and meet their respective obligations to assess the potential impacts of their undertakings;
- that the proponent's description of the undertaking to be assessed include all of the MOI undertakings related to the use or access to MOI lands (see Glossary of Terms);
- the associated EA Category from the Public Works Class EA be identified and met by the environmental assessment (see Figure 22. Category Listing Matrix and/or Tale 2.1 EA Category Identification Table);
- that the proponent's environmental assessment indicate that MOI would be relying on the proponent's assessment to satisfy MOI's obligations under the *Environment Assessment Act*,
- establish a monitoring and report back mechanism to ensure that any obligations of MOI resulting from the assessment will be met; and

An environmental assessment consultation plan be developed to ensure that all stakeholders required to be consulted regarding the undertakings on the MOI lands are consulted

Other Due Diligence Requirements

There may also be other additional due diligence requirements for the use of MOI lands in the proposed project. These may include:

- Phase One Environmental Site Assessment and follow up
- Stage 1 Archaeological Assessment and follow up

-
- Survey
 - Title Search
 - Species at Risk Survey(s)
 - Appraisal

INSTRUCTION NOTE 3 – ARCHAEOLOGY - (see also *Instruction Note on Duty to Consult*)

Archaeological sites are recognized and protected under the *Ontario Heritage Act*. Carrying out archaeological fieldwork is a licensed, regulated activity under the 2011 Ministry of Culture Standards and Guidelines for Consulting Archaeologists.

Archaeological due diligence is required for any proposed project on MOI land that could cause significant below ground disturbance such as, new building construction, installation/modification of site services, and installation/maintenance of new pipelines or transmission lines.

You, as the proponent, must engage IO prior to undertaking any archaeological work on MOI lands.

IO has two in-house licensed archaeologists who should be consulted early in the preparatory stages of a proposed project when geographic and site locations are being considered so that the potential for archaeological resources including historic and Aboriginal material (ion Aboriginal villages and burials sites) can be assessed.

To support both the Public Work Class EA and MOI's duty to consult analysis, archaeological assessments are required to determine if there are any significant findings that may be of cultural value or interest to Aboriginal people (e.g., archaeological or burial sites).

Archaeological work can begin before the assessment under the Public Works Class EA begins but the Class EA cannot be completed until the duty to consult that may be triggered regarding archaeological resources are fulfilled.

Depending upon the number or significance of resources found, the duty to consult may be triggered during any of the 4 phases of archaeological work (see below) or anytime during project construction.

The discovery of Aboriginal resources can impact on activities, including project and site plans, timelines and all costs. As the proponent, you are expected to ensure that you project timelines include adequate time and resources to address MOI due diligence obligations, including internal government approvals. All costs associated with meeting MOI's archaeological obligations will be the responsibility of the proponent.

For Archaeological Assessments (Stages 1 through 4), proponents must adhere to the four stage archaeological fieldwork process prescribed by the Ontario Ministry of Tourism, Culture and Sport (MTCS) as per the 2011 Standards and Guidelines for Consultant Archeologists. Not all noted Stages will be necessary for all work. Respondents must follow industry procedures and practices as per the MTCS Standards and Guidelines for Consultant Archeologists 2011 for each Stage of archaeological assessment, all reporting criteria and formatting, and any other license requirements and/or obligations.

- Stage 1 Background Study - Evaluation of Archaeological Potential
 - Archival research and non-intrusive site visit
- Stage 2 Property Assessment

- In-field systematic pedestrian survey or test pitting and reporting
-
- Stage 3 Site-specific Assessment
 - Limited excavation to determine site significance and size
 - Field works and reporting
- Stage 4 Site mitigation
 - Through either avoidance/protection or excavation Field work 4 to 8 weeks
 - Develop summary report
 - MTCS review – expedited review of summary report 6 weeks
 - Final report
 - Time to develop and implement mitigation measures – negotiation, legal protections, avoidance

INSTRUCTION NOTE 4 – HERITAGE REQUIREMENTS

Built Heritage/Cultural Landscapes

Built heritage/cultural landscapes (cultural heritage) are recognized and protected under the Ontario Heritage Act, the regulations to that Act and the 2010 Ministry of Culture Standards and Guidelines for Conservation of Provincial Heritage Properties (S&Gs) Criteria for determining cultural heritage value or interest are set out in O. Reg. 9/06 and 10/06. The S&Gs set out a process for identifying properties of cultural heritage value, and the standards for protection, maintenance, use and disposal of these properties.

Cultural heritage due diligence will be required for any proposed project on MOI land with the potential to impact cultural heritage resources, such as new building construction, installation/modification of site services, landscape modifications and installation/maintenance of new pipelines, transmission lines.

To support MOI's heritage and MOI PW Class EA obligations, proponents will be required to undertake cultural heritage assessments for all projects that require MOI lands. This will help to determine if the MOI lands are of cultural value or interest to the Province and the level of heritage significance. Where a property has heritage value, proponents may be required to develop appropriate conservation measures/plans and heritage management plans.

You, as the proponent, are strongly encouraged engage IO heritage staff as early in your project planning process as possible and in advance of beginning any cultural heritage assessment work. IO staff will be able to provide advice on the S&Gs and will provide any available heritage information for the MOI lands.

Proponents must also follow industry procedures and practices for all components of cultural heritage assessment work, all reporting criteria and formatting, and any other requirements and/or obligations. IO heritage staff can help identify any required reports.

Should MOI lands be identified under the S&Gs as a Provincial Heritage Property (local significance) or a Provincial Heritage Property of Provincial Significance, IO must be engaged to determine next steps.

Please note that if a Provincial Heritage Property of Provincial Significance is to be impacted, it is likely that consent from the Minister, Ontario Minister, Tourism, Culture and Sport (MTCS) will be required prior to access being granted to MOI lands. Minister's consent requires a detailed application and approvals should land dispositions or building demolitions be applied for as part of the proposed project.

As the proponent, you are expected to ensure that your project timelines include adequate time and resources to address MOI's heritage due diligence obligations, including internal government approvals. All costs associated with meeting MOI's heritage obligations are the responsibility of the proponent.

January 30, 2017

Attention: Mr. P. Grace
Director, Land Transactions, Hydro Corridors and Public Works
Infrastructure Ontario
1 Dundas Street St. W, Suite 2000
Toronto, ON M5G 2L5

Re: Hamilton Light Rail Transit (LRT) Project – Response to EA Notice

In response to your letter dated January 6, 2017, requesting information about the potential use of Infrastructure Ontario (IO) lands for the Hamilton LRT project, we have reviewed the information you have provided with respect to the requirements of IO regarding this project.

We can confirm that based on the current project design, no lands owned or controlled by IO have been identified as being required for the project at this time.

We trust this provides the information you require. Please feel free to contact us should you require any further information.

Sincerely,



Paul Johnson
Director, LRT Project Coordination
Light Rail Transit Office | City of Hamilton
T: 905.546.2424 x6396 | C: 905.977.7458
paul.johnson@hamilton.ca



Andrew Hope
Director, Hamilton Light Rail Transit
Rapid Transit | Capital Projects Group | Metrolinx
T: 416.202.4621 | C: 647.938.9954
andrew.hope@metrolinx.com



**Hamilton Light Rail Transit
Environmental Project Report (EPR) Addendum**

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
General Comments - CHERs and CHERRs				
1.		Please be aware that we have not yet completed our review of the individual CHERs/CHERRs. We will have further comments once we have had an opportunity to review them more fully.	MTCS	As per the Metrolinx Heritage Management Process the CHERs have been reviewed by the Metrolinx Heritage Committee (MHC) and are considered final. All CHERs will be appended to the Final EPR Addendum which will be provided to MTCS.
2.		<p>With regard to the evaluations (CHERs and CHERRs):</p> <p>1. MTCS has not reviewed all the reports at this point. We will provide further property specific comments after we receive the outstanding reports. However, we noticed that for the few CHER/CHERRs we have reviewed, MX consultant determined the properties do not meet the criteria or 9/06 and 10/06, yet a number of the properties are in fact included in the City of Hamilton's Inventory of Heritage Properties. The reports reviewed to date offer no explanation for this discrepancy</p> <p>2. Given that these properties have heritage recognition, we will need to know if the municipal heritage committee and the heritage planner concur with the findings.</p>	MTCS	<p>The inventory of properties has not been subject to an evaluation by the MHC. The inventory represents a screening process that casts a broad net to determine which properties may have heritage potential. This has been confirmed by a MHC member who is a past practitioner familiar with the City of Hamilton's heritage process (David Cumming).</p> <p>These properties have not been formally evaluated or designated by any party prior to the MHC decision.</p>
Chapter 3				
3.	3.3.1	We suggest adding an additional footnote to reference the 2009 Stage 1AA (PIF P264-077-2009).	MTCS	As per the MTCS suggested revision, a footnote was added in Section 3.3.1.
4.		Update the reference in the second recommendation to read, "This work will be done in accordance with MTCS's Standards and	MTCS	As per the MTCS suggested revision, the reference was amended as described.

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
		Guidelines for Consultant Archaeologists (2011), to identify any archaeological remains that may be present”;		
5.		<p>We suggest the subsection for OMSF Site follow the same format as for the B-Line, and simply state the conclusions and recommendations of the Stage 1AA. The Conclusion should be revised to include the recommendations verbatim:</p> <ol style="list-style-type: none"> 1. The Study Area does not retain archaeological potential on account of deep and extensive land disturbance. These lands do not require further archaeological assessment; 2. Should the proposed work extend beyond the current Study Area, further Stage 1 archaeological assessment should be conducted to determine the archaeological potential of the surrounding lands. 	MTCS	As per the MTCS suggested revision, the OMSF subsection has been reformatted to follow the same format as the B-Line subsection. In addition, the Conclusion was amended as described.
6.		The recommendations stated are as in the Stage 1 AA. These recommendations (verbatim) should be carried forward to Table 4-9: <i>Summary of Potential Environmental Condition Changes, Mitigation, Net Effects and Monitoring</i> and Section 6: <i>Commitments to Future Work</i> .	MTCS	As per the MTCS suggested revision, the recommendations will be carried forward to Table 4-9.
7.	3.3.2	We suggest changing the subsection heading to “Methodology”		As per the MTCS suggestion revision, the subsection heading was changed.
8.		We suggest adding a footnote to also reference the Gap Analysis Report.	MTCS	As per the MTCS suggested revision, a footnote was added in Section 3.3.2.
9.		Revise to correct terminology as follows: “The initial CHSR prepared by ASI in December 2016 (see Appendix C-12) identified 230 properties in the CHSR Project study area for the B-Line and OMSF with 205 properties containing <u>known or potential</u> built heritage or cultural heritage landscape resources that are more than 40 years of age.	MTCS	As per MTCS suggested revision, the terminology was amended as described.

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
10.		The EPR should reference the cultural heritage technical study completed for Line-B under the 2011 TPAP, and address how that data was considered and why new studies were undertaken.	MTCS	Introductory comment was added to explain that the cultural heritage technical study assesses changes to the alignment in relation to cultural heritage resources.
11.		While MTCS is not recommending further revisions to the “Methods” subsection at this time, for further projects and future discussions with MTCS you should bear in mind that the purpose is to identify the existing cultural heritage conditions. We hope that we can work with Metrolinx to streamline the cultural heritage component of corridor studies for future projects.	MTCS	Comment Noted
12.		<p>Text on p 3-29 defines <u>Impacts</u> to properties as:</p> <ul style="list-style-type: none"> ○ Direct – where the property requirement involves, demolition of the building or is sufficient to substantially interfere with the building’s use ○ Indirect – where the property requirement is small, and does not affect the use of the building. <p>1. We suggest these definitions be revised to reflect terminology defined by and consistent with MTCS advice since the 1980’s.</p>	MTCS	<p>As per MTCS and Metrolinx suggested revisions, text amended as follows:</p> <ul style="list-style-type: none"> ○ Direct - a direct impact would have a permanent effect on the cultural heritage value or interest of a property or result in the loss of a heritage attribute on all or part of the Provincial Heritage Property. For example: removal or demolition of a building or structure in all or part of the structure, including individual heritage attributes. ○ Indirect - an indirect impact would be the result of an activity on or near the property that may affect its cultural heritage value or interest and/or heritage attributes, but it does not affect the use of the building or physically alter any heritage attribute. For example: isolation of a Provincial Heritage Property from its surrounding environment, context or a significant relationship, vibration damage to a structure due to construction.
13.	Table 3-12	2. Table 3-12 states Impacts as either “Road Widening” or “Building Demolition”. We suggest adding sentence or two which connects the terminology.	MTCS	As per MTCS suggested revision, introductory text was incorporated into EPR Addendum where applicable.

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
14.		3. The EPR also needs to articulate the analysis of impacts and why demolition is the preferred option, what does the road widening encompass and why it is not possible to alter the property (rather than demolish).	MTCS	The focus of Chapter 3 (Existing Conditions) of the EPR Addendum is to describe the existing conditions. The analysis of impacts is included in Chapter 4 (Impact Assessment).
15.		The summary preceding the table states there are 53 properties that will be "directly" impacted i.e. buildings will be demolished. However, Table 3-12 lists 59 properties where buildings will be demolished. Additionally, section 4.3.2 Land Use (p 4-12) states that 87 properties expected to have building impact (demolition?). Please clarify and/or revise these numbers as necessary.	MTCS	Tables and text reviewed for consistency. 87 properties are directly impacted however a CHER was only required for 53 of those 87 properties as determined by the Cultural Heritage Screening report. You are correct that in table 3-12 some of the properties where it states road widening are in fact building impacts. This will be updated to state "building demolition" for all 87 properties.
Chapter 4				
16.		Section 4.4.1 should be consistent with Section 3.3.1 and MTCS's suggested revisions.	MTCS	Similar changes from the suggested revisions for Section 3.3.1 have been made in this section.
17.		Section 4.4.1 should be broken down to subsections as in 3.3.1.	MTCS	Similar changes from the suggested revisions for Section 3.3.1 have been made in this section.
18.		1. Line- B Corridor – the recommendations from the Stage 1AA report (as stated in 3.3.1) should be included here with commitments to undertake the further studies.	MTCS	Similar changes from the suggested revisions for Section 3.3.1 have been made in this section.
19.		2. OMSF Site – the Stage 1AA was cleared of archaeological concerns and no further AA was recommended. However, should proposed work extend beyond the current Study Area further archaeological assessment may be required.	MTCS	Similar changes from the suggested revisions for Section 3.3.1 have been made in this section.
20.		3. The general commitments currently under <i>Construction/Operations Impacts and Mitigation Measures and Net Effects</i> should still be included as general commitments.	MTCS	Commitments have been included under <i>Construction/Operations Impacts and Mitigation Measures</i> were also included under the general commitments.

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
21.		Subsection <i>Construction/Operations Impacts</i> should be revised to address potential impacts. The current text may be applicable to the OMSF site, however, the AA for Line-B identified specific areas along the corridor route where potential for archaeological resources remain, and those areas will be impacted by the proposed project, and further AA must be undertaken. This must be clearly articulated.	MTCS	As per MTCS suggested revision, appropriate text added to this this Section addressing potential impacts.
22.		<i>Mitigation Measures and Net Effects</i> the current text provides general language for accidental finds, but does not address specific mitigation. Please revise the text to state specific commitments.	MTCS	As per MTCS suggested revision, specific commitments were added.
23.		<p>Monitoring/Future Work</p> <p>The current text includes wording from MTCS previous comments. However, it was intended as general advice for all EA projects. We apologize for any confusion, but we suggest the following revisions and additional commitment pursuant to Provision C.3 of the S&Gs.</p> <p>“Complete all required AA (Stage 2 and Stage 3 if recommended by the Stage 2AA) as early as possible in the planning stages of the project.as early as possible, and prior to the completion of detail design.”</p> <p>“Future work will be undertaken in a manner to protect archaeological sites by conserving them in their original location or through archaeological fieldwork, and endeavor to conserve significant archaeological resources in their original location through documentation, protection, and avoidance of impacts. Where activities could disturb significant archaeological resources or areas of archaeological potential, we will take appropriate measures to mitigate impacts.”</p>	MTCS	<p>As per MTCS and Metrolinx suggested revisions, text amended as follows:</p> <p>“Complete all required AA (Stage 2 and Stage 3 if recommended by the Stage 2AA) as early as possible, and prior to the completion of detail design.”</p> <p>“Future work, if necessary, will be undertaken in a manner to protect archaeological sites by conserving them in their original location or through archaeological fieldwork, and endeavor to conserve significant archaeological resources in their original location through documentation, protection, and avoidance of impacts. Where activities could disturb significant archaeological resources or areas of archaeological potential, appropriate measures to mitigate impacts will be undertaken.”</p>
24.	4.4.2 Built Heritage Resources and Cultural Heritage Landscapes (p 4-14)	As MTCS previously advised, the EPR Addendum should include a statement tying it into the 2011 EPR, and provide some description as to how and why the current design was developed.	MTCS	This description is already addressed in Chapter 1 (Introduction) and will also be incorporated into Chapter 3 (existing conditions).

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
25.	<u>Table 4.5 (4-15 to 4-25)</u>	Table 4.5 (4-15 to 4-25) provides a list of properties that will be “directly impacted” (e.g. demolition). The EPR should clearly articulate and describe the anticipated impact. The impact analysis should describe all other alternatives that have been considered, and if demolition is the preferred option, how will the impacts be mitigated.	MTCS	As you are aware, this EPR Addendum is being assessed under the Transit Project Assessment Process, as outlined in O.Reg. 231/08, where a proponent is asked to put forward a “preferred” option for the transit project and to undertake environmental studies for that preferred project. Identified impacts are associated with the preferred alignment. The development of the preferred alignment has taken into consideration known heritage resources present along the alignment and has been designed to minimize impacts to other potential heritage resources.
26.		For properties determined to meet 9/06 or 10/06 (i.e. heritage properties) it reads, “HIA will be completed during detail design to ensure that impacts to the heritage resources are appropriately mitigated”. The commitments included in the EPR need to be clear. We suggest the following wording for properties to be <u>directly impacted</u> : “A Heritage Impact Assessment will be completed in accordance with the S&Gs as early as possible during the detail design phase and prior to completion of detail design. The HIA will be developed in consultation with and submitted for review to MTCS and other heritage stakeholders (municipal planners and municipal heritage committee). The HIA will discuss the alternatives considered, and that all other alternatives to the removal and/or demolition have been considered and the best alternative has been adopted. The HIA will also make recommendations to minimize or mitigate adverse effects on the property resulting from the removal and demolition”.		As per MTCS and Metrolinx suggested revisions, text amended as follows: “A Heritage Impact Assessment (HIA) will be completed in accordance with the S&Gs as early as possible during the detail design phase and prior to completion of detail design. The HIA will be provided to MTCS for review. Municipal heritage departments will be consulted in accordance with municipal requirements. The HIA will be completed in accordance with the MTCS guidance documents and industry best practices.
27.	<u>Table 4-6 (p4-26 to 4-27)</u>	Table 4-6 (p4-26 to 4-27) provides a list of properties that will be “indirectly impacted” (i.e. road widening) by the project. Mitigation in each case is stated as “To be determined from CHER in later design phase”. The EPR should clearly articulate the types and extent of anticipated impacts on a property. For examples, to what extent will each property be impacted by the anticipated Road Widening? Is the road widening going to encroach onto the properties?	MTCS	As per MTCS suggested revision, additional description has been incorporated in Table 4-6 introductory text.
28.		The EPR should articulate clearly the commitment for mitigation and a specific timeline. We suggest the following commitment be included:	MTCS	As per MTCS and Metrolinx suggested revisions, text was amended as follows:

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
				Prior to completion of detail design, a CHER will be completed in accordance with the Metrolinx Heritage Management Process and if the property is determined by the MHC to be of cultural heritage value, a HIA will be developed and provided for review to MTCS and to the City of Hamilton Heritage department in accordance with municipal requirements. The HIA shall be completed prior to completion of detailed design.
29.		Please note: Tables 4.8 Summary of Potential Impacts. (4-39), Table 4-9 –Summary of Commitments (Heritage p 4-53) and Section 6 Commitments to Future Work (6.5.11. Archaeology and 6.5.12. Built Heritage Resources and Cultural Heritage Landscapes) should also be revised to be consistent with above revisions.	MTCS	Similar amendments from previous suggested revision for Table 4-6 made for these tables.
30.	4.7	4.7 Benefits of the Project (p 4-39) The footnote refers to: Metrolinx Transit Project Assessment Process, Eglinton Crosstown LRT, Section 5 p.62; Environmental Project Report Addendum, October 2013. Is this an error or intentional?	MTCS	Yes, this was an error. The incorrect reference was amended.



**Hamilton Light Rail Transit
Environmental Project Report (EPR) Addendum**

Comments received from MOECC May 2, 2017

MOECC

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
1.	General Comments	Section 1, page 1-1, indicates that on December 22, 2011, MOECC issued a Notice to Proceed for the 2011 EPR. This is not accurate; instead, MOECC’s Environmental Approvals Branch sent a letter on Dec 22 indicating that the City may now proceed to issue its Statement of Completion. Please change this to: “On December 22, 2011, the Ontario Ministry of the Environment and Climate Change (MOECC) issued a Notice to Proceed letter to the City of Hamilton indicating that the City may now proceed to issue its Statement of Completion under the Transit Project Assessment Process for the B-Line Rapid Transit Project (The Project).”	MOECC	Amended
2.	General Comments	e There appears to be a typo on page 4-26, in which reference to Table 4-5 should instead be Table 4-6: “The properties listed in Table 4-5 Table 4-6 have indirect property impacts...”	MOECC	Amended
3.	General Comments	3. Section 6.5.12 (p. 6-3) and Table 4-9 (p. 4-53): On both pages, this statement should refer to MTCS rather than MOECC: “Where required, Heritage Impact Assessments (HIA) will also be completed during detailed design to protect heritage properties where possible and to identify ways in which impacts to any of these attributes can be mitigated (based on MOECC MTCS feedback).”	MTCS	Amended
4.	General Comments	4. MOECC’s wastewater reviewer provided the following comment for Metrolinx’s awareness during permitting: Having gone through the EPR document, I note the main component that would need an approval under s53 OWRA is a proposed stormwater management facility at the Operations Maintenance and Service Facility (OMSF). Although the proposal is at a conceptual stage, the eventual stormwater management works should be designed	MOECC	Amended

Responses to MTCS Comments Received March 31, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
		in accordance with the Ministry's guidance document entitled "Stormwater Planning and Design (SWMP 2003) Manual" and be vetted by the local municipality and the conservation authority.		



Hamilton Light Rail Transit
Environmental Project Report (EPR) Addendum

Comments from MTCS dated May 2 and teleconference between Metrolinx with MTCS and MOECC on May 9, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
General Comments				
1.		May 2 – MTCS submitted several comments with respect to language modifications and descriptions of impacts		It was agreed that a teleconference will be held to discuss MTCS's comments.
2.		Teleconference took place on May 9, 2017 between MTCS and MOECC with Metrolinx to discuss MTCS' May 2, 2017, comments		MTCS comments were discussed and resolutions achieved.



Hamilton Light Rail Transit Environmental Project Report (EPR) Addendum

Responses to MTCS and MOECC Comments after Teleconference on May 16 and 18, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
General Comments				
1.	General	MTCS requested a figure depicting the previously identified cultural heritage landscapes overlapping with properties that CHERs were completed for.	MTCS	Metrolinx provided the requested figures to MTCS.
2.	General	MOECC requested summaries of Heritage Committee Discussions.	MTCS	A follow up response was sent to MTCS on May 9th and May 10th providing MTCS with all Final CHERs and additional information including a Summary of Consultation with the Hamilton Municipal Heritage Committee and text edits to section 4.4.2.
3.	General	Suggested revised wording for cultural heritage impacts in Section 4.4.2 of the EPR Addendum.	MTCS	Revised text provided. EPR amended to include direction to circulate HIAs to MTCS and Heritage Committee.
4.	General	We expect the municipal heritage committee would have another opportunity to review the Final Addendum Report in late May. The final report will include all the CHERs and decisions as well as an impact assessment discussion on the 6 buildings that would be demolished.	MTCS	The Municipal Heritage Committee will have the opportunity to review and comment on the Final EPR Addendum as part of the formal 30-day public review period.
5.	General	We understand that the municipal heritage committee had questions about the EPR Addendum and CHERs. Could you please provide, and include in the EPR, the questions/concerns raised and how they will be (or were) addressed?	MTCS	Because these meetings were in person and involved the presentation by Metrolinx to the Committee, questions and concerns were not formally submitted nor were they recorded. Questions were answered to the satisfaction of the Committee at these meetings. This is similar to other stakeholder meetings, where questions are answered at such meetings and any outstanding comments can be submitted formally.

Responses to MTCS and MOECC Comments after Teleconference on May 16 and 18, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
Chapter 4				
4.	4.4.2	Please revise the intro paragraph for clarity.	MOECC	Revised text provided and amended.
Chapter 6				
6.	Section 6.5.12	Please add a statement to section 6.5.12 that Metrolinx will circulate the HIAs to MTCS and the Hamilton Municipal Heritage Committee for review.	MOECC	A statement has been added to Paragraph 3 of section 6.5.12

**NOTICE OF ENVIRONMENTAL PROJECT REPORT ADDENDUM
HAMILTON B-LINE LIGHT RAIL TRANSIT PROJECT**

Prepared by the City of Hamilton and Metrolinx

THE PROJECT

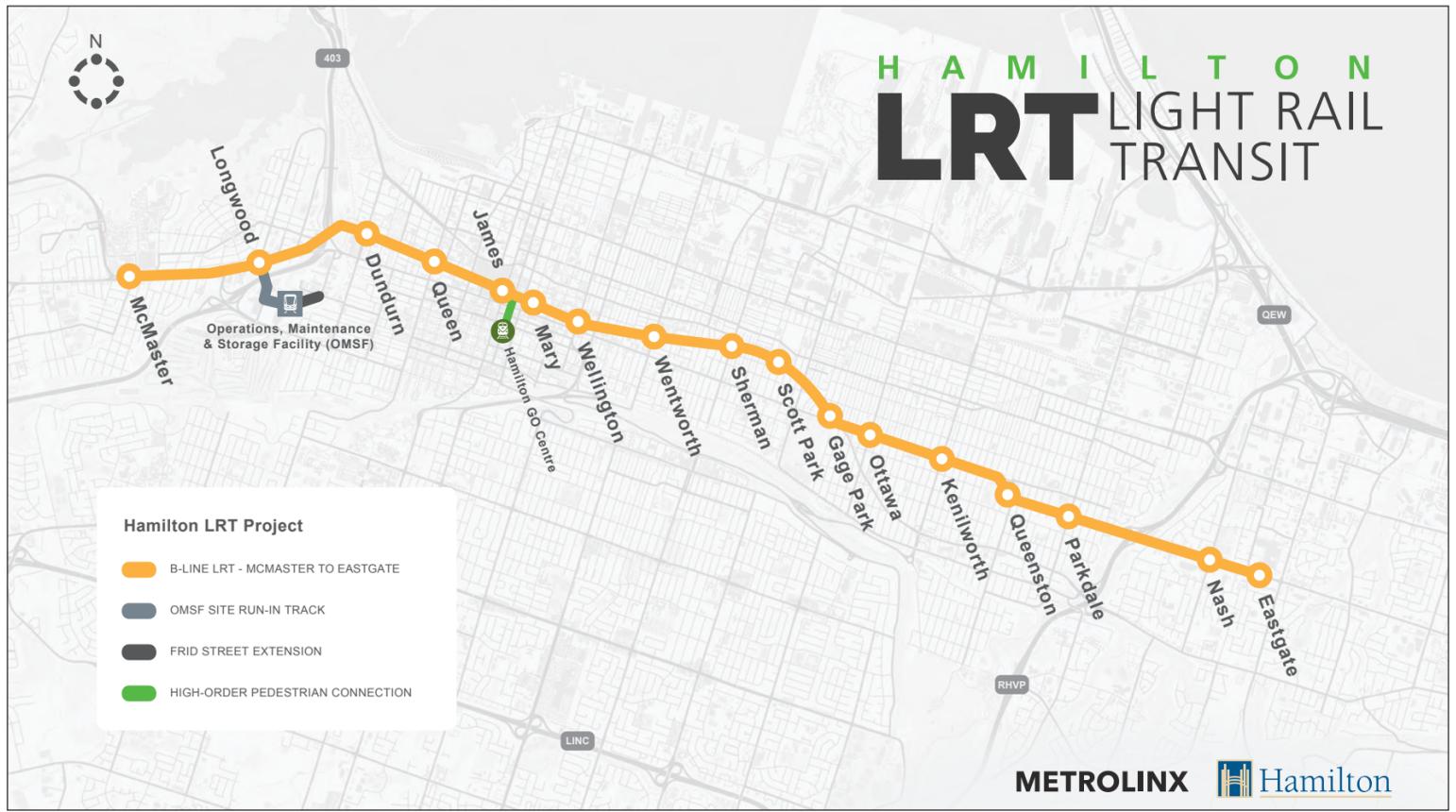
In 2011, the City of Hamilton conducted an environmental assessment for the B-Line Rapid Transit Project under the Transit Project Assessment Process (TPAP) found in Ontario Regulation 231/08. An Environmental Project Report (EPR) for this transit project was completed on October 14, 2011 and a Statement of Completion was submitted to the Ministry of the Environment and Climate Change on January 11, 2012. Subsequently, the City of Hamilton and Metrolinx have prepared an Addendum to the B-Line Rapid Transit Project EPR completed in 2011, now referred to as the Hamilton B-Line Light Rail Transit Project (the Project). Metrolinx and the City of Hamilton have revised the original scope of work to include:

- design modifications to the B-Line Rapid Transit Project EPR completed in 2011;
- new bus terminal at the McMaster University;
- an assessment of a High-Order Pedestrian Connection on Hughson Street connecting the Hamilton GO Centre on Hunter Street with LRT; and,
- an assessment of an Operations Maintenance and Storage Facility (OMSF) where light rail vehicles would be maintained and stored, along with its run-

in track in mixed traffic on Frid Street and Longwood Road to Main Street West, across the Longwood Road bridge and via the Frid Street extension.

Design modifications were made to be consistent with the City of Hamilton's desired LRT design principles promoting "Rapid, Reliable and Safe". A new bus terminal at McMaster was developed to be consistent with the alignment design changes. The High-Order Pedestrian Facility was added to enhance connections between the LRT route and the Hamilton GO Centre and the OMSF was included as a necessary element of the project that had not been fully developed and assessed in the original EPR.

These changes to the Project were determined to be inconsistent with the B-Line Rapid Transit Project EPR completed in 2011. As described in Section 15 (1) of Ontario Regulation 231/08, any change that is inconsistent with a previous EPR for which a Statement of Completion was submitted requires an assessment of the impacts to the environment associated with the change and a description of potentially new mitigation measures, including potentially new monitoring systems, in an Addendum to the previously completed EPR.



This Study Area map identifies the project corridor, OMSF location and LRT stops.

THE EPR ADDENDUM PROCESS

An addendum to the EPR for the Project, included a summary and all other required documents, has been prepared and is now available for a 30-day review period starting May 29, 2017 on the project website (www.hamilton.ca/LRT) and (www.Metrolinx.com/HamiltonLRT) and at the following locations:

<p>Ministry of the Environment and Climate Change Environmental Approval, Access and Service Integration Branch 135 St. Clair Avenue West, 1st Floor, Toronto, Ontario, M4V 1P5 (416) 314-8001 or 1 (800) 461-6290 Monday to Friday: 8:30 a.m. to 5:00 p.m.</p>
<p>Ministry of the Environment and Climate Change West Central Region, Ellen Fairclough Building 119 King Street West, 12th Floor, Hamilton, Ontario L8P 4Y7 (905) 521-7640 or 1 (800) 668-4557 Monday to Friday: 8:30 a.m. to 5:00 p.m.</p>
<p>Hamilton City Hall, Information Desk 71 Main Street West, 1st Floor, Hamilton, Ontario L8P 4Y5 (905) 546-2424, Extension 1110, Monday to Friday: 8:30 a.m. to 4:30</p>
<p>Hamilton Public Library, Central Library 55 York Boulevard, Hamilton, Ontario L8N 4E4 (905) 546-3200, Monday to Thursday: 9:00 a.m. to 9:00 p.m. Friday: 9:00 a.m. to 6:00 p.m., Saturday: 9:00 a.m. to 5:00 p.m.</p>
<p>Hamilton Public Library, Westdale Branch 955 King Street West, Hamilton, Ontario L8S 1K9 (905) 546-3456, Monday: 10:00 a.m. to 6:00 p.m., Tuesday to Thursday: 10:00 a.m. to 9:00 p.m., Friday: Closed, Saturday: 10:00 a.m. to 5:00 p.m.</p>
<p>Hamilton Public Library, Red Hill Branch 695 Queenston Road, Hamilton, Ontario, L8G 1A1 (905) 546-2069, Monday: Closed, Tuesday to Thursday: 10:00 a.m. to 9:00 p.m., Friday: 10:00 am to 6:00 p.m., Saturday: 10:00 a.m. to 5:00 p.m.</p>

Interested persons are encouraged to review this document and provide comments by June 28, 2017 to the project office:

Hamilton Light Rail Transit (LRT) Office
(Metrolinx / City of Hamilton)

Attention: Community & Stakeholder Relations Coordinator
36 Hunter Street East, Hamilton, ON L8N 3W8
(905) 546-2424, Extension 6385, LRT@hamilton.ca

There are circumstances where the Minister of the Environment and Climate Change has the authority to require further consideration of the change to the transit project, or impose conditions on it. These include if the Minister is of the opinion that:

- The change to the transit project may have a negative impact on a matter of provincial importance that relates to the natural environment or has cultural heritage value or interest; or,
- The change to the transit project may have a negative impact on a constitutionally protected Aboriginal or treaty right.

Before exercising the authority referred to above, the Minister is required to consider any written objections to the change to the transit project that he or she may receive within 30 days after the Notice of EPR Addendum is first published.

If you have discussed your issues with the proponent and you object to the identified change to the project, you can provide a written submission to the Ministry of the Environment and Climate Change no later than June 28, 2017 to the address provided below. All submissions must clearly indicate that an objection is being submitted and describe any negative impacts to matters of provincial importance (natural/cultural environment) or Aboriginal rights.

Ministry of the Environment and Climate Change

Environmental Approval, Access and Service Integration Branch
135 St. Clair Avenue West, 1st Floor, Toronto, Ontario, M4V 1P5
Attention: Sasha McLeod, Special Project Officer
(416) 314-8001 or 1 (800) 461-6290
Fax: (416) 314-8452
E-mail: EAABGen@ontario.ca

If not already provided, a copy of the objection will be forwarded to the proponent by the ministry.

All personal information included in a submission - such as name, address, telephone number and property location - is collected, maintained and disclosed by the Ministry of the Environment for the purpose of transparency and consultation. The information is collected under the authority of the Environmental Assessment Act or is collected and maintained for the purpose of creating a record that is available to the general public as described in s.37 of the Freedom of Information and Protection of Privacy Act. Personal information you submit will become part of a public record that is available to the general public unless you request that your personal information remain confidential. For more information, please contact the Project Officer or the Ministry of the Environment and Climate Change Freedom of Information and Privacy Coordinator at 416-314-4075.

EPR ADDENDUM REVIEW PERIOD

The 30-day review period runs from May 29 - June 28, 2017
www.hamilton.ca/LRT



FOR MORE INFORMATION

E-mail us at LRT@hamilton.ca
www.hamilton.ca/LRT
www.metrolinx.com/HamiltonLRT



Hamilton Light Rail Transit Environmental Project Report (EPR) Addendum

Review of MTCS Comments on Final EPR Addendum June 13, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
1.	General	When referring to Appendix C-11, it is Appendix C-11, Volume 2.	MTCS	Amended for Appendices C-11, Volume 1 and 2
2.	General	If using footnotes please ensure they are appropriately placed, and reference the author of the report.	MTCS	Amended footnotes in Chapters 3 and 4
3.	General	Tables 3-10, 3-11, 4-4, 4-5 and 4-6 contain errors and inconsistencies. These must be corrected. For example, the CHER and SCHV for at least one PHP (address), is noted in the table (Number) as NOT having CHVI. Then, another table (Number) indicates that a CHER has been completed, yet it was never provided to us, nor is it included in the Appendix. In other cases, there are inconsistencies between the tables	MTCS	All tables have been updated
4.	General	Future Commitments. As per MOECC guidance material and previous discussions, a commitments 'represents a guarantee from a proponent about a certain course of action'. It needs to be clear and detailed – what, when and how. The current text is still quite general and there are inconsistencies between sections. We have provided wording that is clear, property and impact specific (direct and indirect) and consistent with our discussions with Metrolinx. We have included it in each of the relevant sections (e.g. Sections 3, 4, Table 4.9 and 6)	MTCS	Text amended
CHAPTER 3				
5.	General	There is a number of changes requested, which are of editorial nature, and in the interest of clarity and readability.	MTCS	Only changes that impact the understanding and/or accuracy of the document have been amended

Review of MTCS Comments on Final EPR Addendum June 13, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
6.	Table 3-10	There still seem to be inconsistencies between Table 3-10 and the text above.	MTCS	Table and text correspond. Text has been amended to reflect changes in CH entries following extension past Queenston (see Item 7)
7.	Table 3-10	There still seem to be inconsistencies between Table 3-10 and the text above.	MTCS	There are 250 properties (reduced from 256 following the late change to extend the corridor to Eastgate Mall) that were screened
8.	Table 3-10	<p>1. If this table is to remain in the EPR the figures must be reviewed for accuracy and consistency with Table 3-11. For example, Table 3-11 includes a total of 251 properties. It is not clear where that is reflected in Table 3-10.</p> <p>2. the number of CHERs completed is incorrect</p> <p>3. the table should also include the properties determined to have CHVI. And that will be directly impacted.</p>	MTCS	Five properties were removed from Table 3-11 following extension to Queenston. Text and Table 3-10 have been updated
9.	Table 3-10	2. the number of CHERs completed is incorrect	MTCS	The number of CHERs completed (53) is correct
10.	Table 3-10	3. the table should also include the properties determined to have CHVI. And that will be directly impacted.	MTCS	A new column with the number of properties with CHVI has been added
11.	Section 3.3.1	In first paragraph: Both Stage 1 archaeological assessments (2009 and 2017) reports need to be referenced.	MTCS	Amended
12.	Section 3.3.1	Second bullet point reworded for clarity and readability. Also, a footnote for the 2009 AA report could be placed here, however, it seems redundant.	MTCS	Amended, a footnote was added for the 2009 Stage 1AA report

Review of MTCS Comments on Final EPR Addendum June 13, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
13.	Section 3.3.1 Previous Archaeological Research-B Line Corridor	In fourth bullet point: The 2009 Stage 1AA report says mitigation not monitoring.	MTCS	Amended
14.	Section 3.3.1 Previous Archaeological Research-B Line Corridor	Ensure the whole 2009 Stage 1AA report is appended.	MTCS	Report obtained and will be included in Amended materials
15.	Section 3.3.2	“The cultural heritage screening was conducted for the Project study area, which includes the following components:” - Do you mean the 2016/17 ASI CHSR?	MTCS	Yes, this refers to the 2016/17 ASI CHSR
16.	Section 3.3.2	“Following this assessment, a further review was conducted by AECOM “ - Do you meant the Gap Analysis Report? If using a footnote, is should be placed the first time the report in mentioned.	MTCS	Yes, and amended
17.	Section 3.3.2 Findings	Please add a paragraph summarizing the outcomes. In particular the EPR must state clearly the properties determined to have CHVI Note: Added text regarding 893 King East and 895-899 King East have been deleted to be consistent with revise tables	MTCS	Information on the CHVI is included in the Tables
18.	Section 3.3.2 Findings	Changes to text related to definition of direct and indirect	MTCS	Amended
19.	Section 3.3.2 Findings	Comment to added text: The properties listed are based on MTCS review of the Table 3-11 and also the CHERs and tracking tables provided to us by Metrolinx. Please ensure it is accurate.	MTCS	Tables 3-10, 3-11, 4-4, 4-5, 4-6, and 4-9 have been reviewed and updated for accuracy and consistency Note: Added text regarding 893 King East and 895-899 King East have been deleted to be consistent with revised tables

Review of MTCS Comments on Final EPR Addendum June 13, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
20.	Section 3.3.2 Findings	Comment to added text on indirect impacts: The specific properties must be clearly identified, either listed as here OR refer to Table 4.6 which lists them.	MTCS	Information on the properties is included in the Tables
21.	Table 3-11	There are errors in Table 3-11. For example, for some properties are a CHER is listed as pending, but it is appended to this EPR; some properties are listed as NOT meeting 9/06 but in fact the CHER, MX Decision Form etc. states they are properties of CHVI. 3 Proctor Blvd is listed as having a CHER, but none has been provided to MTCS. Please provide it.	MTCS	“Pending” entries have been updated Outcomes have been updated 3 Proctor Blvd is the same as 886-874 King. Table entry has been amended to reflect King Street Address
CHAPTER 4				
22.	General	There is a number of changes requested, which are of editorial nature, and in the interest of clarity and readability.	MTCS	Only changes that impact the understanding and/or accuracy of the document have been amended
23.	Table 4-4	If this table is to remain it must also be corrected per Table 3-11	MTCS	Changes made to reflect changes in Table 3-10
24.	Section 4.4.1 Monitoring/Future Work	In first bullet point, the language must change to indicate the proponent’s commitments, from should to will	MTCS	Amended

Review of MTCS Comments on Final EPR Addendum June 13, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
25.	Section 4.4.2	First paragraph: rewording for clarity and accuracy	MTCS	Six <i>buildings</i> replaced by Six <i>properties</i>
26.	Section 4.4.2 Cultural Heritage Screening	Property numbers to match the changes made in Table 4-4	-	Amended
27.	Section 4.4.2 Direct Impacts and Mitigation Measures	This should be consistent with the first paragraph of section 4.4.2. If using jargon they need some explanation.	MTCS	Amended
28.	Section 4.4.2 Indirect Impacts and Mitigation Measures	Additional paragraphs for clarification	MTCS	Amended
29.	Table 4-5	Please include Note text in Table 4-9 as part of the commitments.	MTCS	Amended
30.	Table 4-5	There are errors in this table. For example, properties that were determined to CHVI are listed as not having CHVI, some properties are listed as having CHERs pending, whereas the CHERs are appended etc. Please review and correct the table.	MTCS	Amended
31.	Table 4-5	Table formatting	-	As part of the review, a blank column was removed
32.	Table 4-5	2. Given that mitigation and future commitments are required for only those properties with CHVI, this table should list only properties with CHVI.	MTCS	For complete information log, all properties are included in Table 4-5.
33.	Table 4-6	There are errors in this table and data that differs from Table 3-11. .For example, Table 4-6 list properties as requiring a CHER , whereas Table 3-11 lists the same property as No Further Review etc. Pleas review and correct as necessary.	MTCS	3 & 7 Grosvenor entry removed. Table is now correct

Review of MTCS Comments on Final EPR Addendum June 13, 2017

#	ITEM	COMMENTS	SUBMITTED BY	RESPONSE
34.	Section 4.4.2 Monitoring/Future Work	Re-organization and re-writing of bullet points for better clarity	MTCS	Amended
CHAPTER 6				
35.	General	There is a number of changes requested, which are of editorial nature, and in the interest of clarity and readability.	MTCS	Only changes that impact the understanding and/or accuracy of the document have been amended
36.	Section 6.5.12	Re-writing and additional information for clarity and readability.	MTCS	Amended