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June 28, 2019

Ministry of the Environment, Conservation and Parks
Mr. Jeff Yurek, Minister
Office of the Minister
77 Wellesley Street West
11th Floor, Ferguson Block
Toronto, ON M7A 2T5

Re: ENV1283MC-2017-1871
Response to Part II Order regarding the Environmental Assessment for the proposed
Badley (Metcalf Street) Bridge Replacement, Victoria Street Pedestrian Bridge and
West Mill Street Enhancements

The County of Wellington received a letter from the Minister's office (dated August 25, 2017) which detailed the decision of the MECP on the Part II Order request for the aforementioned projects. This letter provides an update to our letter dated December 10, 2018 (see **Attachment 1**) regarding the Minister's conditions of approval for the project.

For clarity, the format of the response matches that of the MECP decision letter.

MECP Comment 1: Wellington County shall consider dedicated cycle lanes as part of the final design for the proposed Badley (Metcalf Street Bridge).

- a) The final design of Badley (Metcalf Street) Bridge and the rationale for the final design shall be posted on Wellington County's website prior to the start of construction for Badley (Metcalf Street) Bridge***

As identified in the December 10, 2018 response, the County has included a dedicated 1.5 m lateral space for cyclists, on both sides of the street, across the structure. This design allows for separation of vehicular, cycling and pedestrian traffic.

The rationale for this is that it required no change to the baseline design documented in the ESR which includes 1.5 m shoulders (paved) across the structure. This lateral space accommodates cyclists, disabled vehicles and provides separation from pedestrians on the sidewalks on the bridge. The space for cyclists is restricted to the limits of the bridge project; however, over the life of the bridge (75 years

plus) it will accommodate future projects that may extend the linear cycling facilities to meet the bridge approaches.

- b) If dedicated cycle lanes are incorporated into the final design and it results in major change to the Project that would require a Schedule B or C Class Environmental Assessment an addendum would be required.***

Lateral space is documented in the ESR and an addendum is not required.

MECP Comment 2: Wellington County in consultation with the Ministry of Tourism, Culture and Sport shall:

- a) Ensure that a qualified individual (with recent and relevant expertise and experience submits completed or supplementary Heritage Impact Assessment and Cultural Heritage Evaluation Reports for the Badley (Metcalfe Street) Bridge to in accordance with Ministry of Tourism, Culture and Sport guidance and standards prior to detailed design.***

A Supplementary Cultural Heritage Evaluation and Heritage Impact Assessment Report (Supplementary HIA) for the Badley (Metcalfe Street) Bridge was prepared by Wendy Shearer (Cultural Heritage Specialist) and Mark Thompson Brant (Sr. Conservation Architect and Urbanist with MTBA Associates). The report was submitted to the Ministry of Tourism, Culture and Sport and on April 11, 2019 the report was accepted by the Ministry as fulfilling Condition 2a. A copy of the Supplementary Heritage Impact Assessment is provided in **Attachment 2**, and the MTCS letter is provided as **Attachment 3**.

- b) Ensure that the Heritage Assessment for the Badley (Metcalfe Street) Bridge demonstrates how cultural heritage resources have been incorporated in the evaluation of the alternatives for the overall Badley (Metcalfe Street) Bridge Environmental Assessment.***

As identified in the December 10, 2018 response, based on input from MTCS, both rehabilitation and replacement alternatives were carried forward and evaluated as preliminary design alternatives in the Environmental Assessment. The feasibility of conservation options/strategies was documented in the EA to determine viable alternatives. This is provided in **Table 1**. Based on an initial screening of these options/strategies, Options 1, 3, 8 and 9 were carried forward as part of the preliminary design alternatives considered in the EA.

Table 1: Feasibility of Conservation Options/Strategies for the Badley (Metcalfe Street) Bridge		
Conservation Option/Strategy	Feasibility	Carried Forward for Further Consideration
1. Restoration of missing or deteriorated elements where physical or documentary evidence (e.g. photographs or	Restoration/replacement of deteriorated elements will extend the bridge’s service life until replacement is required in future years (the next rehabilitation cycle would be in 20-30 years).	Carried forward for evaluation as Alternative 1 - Rehabilitation.

Table 1: Feasibility of Conservation Options/Strategies for the Badley (Metcalf Street) Bridge

Conservation Option/Strategy	Feasibility	Carried Forward for Further Consideration
drawings) can be used for their design.		
2. Retention of existing bridge with no major modification undertaken.	Elements of the structure are in advanced state of deterioration and nearing the end of their useful service life. Major rehabilitation would be required for the existing bridge to be maintained, resulting in major modifications to the existing structure.	Not considered as an alternative for rehabilitation of the structure based on life safety criteria.
3. Retention of existing bridge with sympathetic modification.	Restoration/replacement of deteriorated elements will extend the bridge’s service life until replacement is required in future years.	Retention of the existing structure with sympathetic modifications was carried forward as Alternative 1 – Rehabilitation.
4. Retention of existing bridge with sympathetically designed new structure in proximity.	Due to adjacent land uses and existing infrastructure, a realignment of Metcalfe Street to provide a new vehicular bridge in close proximity while retaining the existing bridge for active modes of transportation is not feasible. Construction of a new bridge at an adjacent location for vehicular traffic would result in considerable impact to existing buildings within the downtown core.	Realignment of Metcalfe Street and construction of a bridge in proximity to the existing structure was not carried forward.
5. Retention of existing bridge, no longer to be used for vehicular purposes but adapted for pedestrian walkways, cycle paths, scenic viewing, etc.	The existing bridge accommodates approximately 9500 vehicles/day and is the main access for traffic into/out of the downtown core. Adapting the structure for active transportation will restrict access to the community and have significant business impacts.	Adaptation of the existing structure was not considered.
6. Relocation of bridge to appropriate new site for continued use (see 4) or adaptive re-use (see 5).	Due to its size and condition, relocation of the existing structural steel truss was not considered economically or technically feasible.	Relocation of the structure was not carried forward.
7. Retention of bridge as heritage monument for viewing purposes only.	Due to its size and condition, relocation of the existing structural steel truss was not considered economically or technically feasible.	Retention of the structure as a monument was not carried forward. The retention of a portion of the bridge as a monument is considered by Option No. 8.
8. Salvage elements/ members of bridge for incorporation into new structure or for future conservation work or displays.	Elements of the existing structure will be salvaged and incorporated into an interpretive plaque, public display/art or comparable feature.	Recommendation to carry forward salvage as mitigation is included for all replacement structure alternatives.
9. Full recording and documentation of	Documentation of the existing structure will be completed prior to demolition.	Recommendation for documentation as mitigation is included for

Table 1: Feasibility of Conservation Options/Strategies for the Badley (Metcalf Street) Bridge		
Conservation Option/Strategy	Feasibility	Carried Forward for Further Consideration
structure if it is to be demolished.		all replacement structure alternatives.

Following the evaluation of preliminary design alternatives, replacement of the existing structure with a three-span rigid frame was determined to be the Technically Preferred Alternative (Alternative 2e). Additionally, the following mitigation measures were recommended:

- Salvage of elements/members of the bridge for incorporation into the new structure or for future conservation work displays.
- Full digital recording of the structure (photographs from multiple angles, plan, elevations, 2 cross sections including existing abutments and details of typical truss members and connections) if it is to be demolished.
- Follow the design principles of the Bridge Design Guidelines developed by Centre Wellington and the Standards & Guidelines for the Conservation of Historic Places in Canada.

c) Ensure that if the preferred alternative remains (construction of a new bridge), the Heritage Impact Assessment is used to guide the design for the replacement of the bridge by commemorating the existing Badley (Metcalf Street) Bridge and ensuring the replacement bridge is sympathetic to surrounding cultural heritage resources.

The Supplementary HIA included a section on context sensitive design that provided guidance for the design team on the incorporation of sympathetic design elements. The Supplementary HIA described alternative approaches for the detail design of the new bridge which are sympathetic to the design qualities of the original bridge and its setting.

Features of the design concept identified in the Supplementary HIA and carried through detail design included decorative lighting, a pedestrian overlook on the west side of the structure, and a decorative railing. Vertical features were also included at the south end of the bridge to define the entrance onto the bridge and act as a gateway feature.

Recommendations from the Supplementary HIA are detailed on Page 44 of the Report and are summarized below:

- Incorporate the design principles expressed in the report regarding the design of a new bridge;
- While developing the design of the new bridge, seek advice from a qualified person with expertise and recent experience in addressing the incorporation of sympathetic design elements into new structures; and
- Allow review by agencies, the public, and the Township of Centre Wellington (at the Detail Design Public Information Centre) to ensure that any new design achieves a sympathetic solution to reflect the cultural heritage value of the existing bridge and is compatible with the cultural heritage landscape.

- d) Submit the amended Heritage Impact Assessment and Cultural Heritage Evaluation Report for the Badley (Metcalf Street) Bridge to the Ministry of Tourism, Culture and Sport, the municipal heritage planner and the municipal heritage committee(s) for review prior to detailed design.**

The Supplementary HIA was submitted to MTCS, the municipal heritage planner and the municipal heritage committees in May 2019. The December 10, 2018 response provides a timeline of these submissions. The Supplementary HIA was accepted by MTCS in April 2019.

- e) Post and circulate notice of posting for comment the final amended Heritage Impact Assessment and Cultural Heritage Evaluation Report for the Badley (Metcalf Street) Bridge on Wellington County website.**

A notice identifying the availability of the Supplementary HIA on the County's website was published in the Wellington Advertiser and emailed/ mailed out to the mailing list and posted on the County's website in April 2019.

- f) If changes to the preferred alternative for the Badley (Metcalf Street) Bridge result from the Supplementary Heritage Impact Assessment and Cultural Heritage Evaluation Report, Wellington County shall review the planning and design process and the current environmental setting to ensure the Project and mitigation measures are still valid.**

The County confirms that the planning and design conditions are still valid.

- g) Wellington County shall complete the addendum process as specified in the appropriate Class Environmental Assessment is required.**

The design as proposed will not require a subsequent addendum as it falls within the scope of works described in the ESR.

- h) Shall continue to circulate the Ministry of Tourism, Culture and Sport's Culture Division Programs and Services Branch with Updates on the progress of the Project.**

The December 10, 2018 response provides a timeline of consultation with the MTCS's Culture Division Programs and Services Branch. The County has continued to circulate MTCS on project progress as the Supplementary HIA was finalized and detailed design was completed. This letter has been copied to MTCS to provide them with an update on the project progress.

MECP Comment 3: Wellington County shall ensure that the Badley (Metcalf Street) Bridge can withstand severe storm events through the necessary mitigation and adaption measures.

As further detailed in the December 10, 2018 response, the design flood for the Badley (Metcalf Street) Bridge is the 100-year flood and the vertical clearance to the soffit at the span centrelines will be 1.0 m. Based on an increase in flow of 35%, the vertical clearance will accommodate these future storm events.

MECP Comment 4: Wellington County shall hold one public meeting to inform the public of its proposed design for the Badley (Metcalf Street) Bridge at least 60 days prior to the start of any construction activities related to the Badley (Metcalf Street) Bridge.

A Public Information Centre was held on Thursday, June 13 2019 to inform the public of its proposed design for the Badley (Metcalf Street) Bridge. A summary report of this meeting is provided as **Attachment 4**.

MECP Comment 5: Wellington County shall submit the final design of the Badley (Metcalf Street) Bridge, the rationale for the final design and documentation from the public meeting to the Director of the Environmental Approvals Branch prior to the start of construction of the Badley (Metcalf Street) Bridge.

The final design of the Badley (Metcalf Street) Bridge is provided as **Attachment 5**.

The rationale for this undertaking, as identified in ESR and the Supplementary HIA, is that the new bridge will:

- Provide the structural load carrying capacity to accommodate vehicular traffic across the Grand River and maintain the Wellington County road linkage to the Village of Elora.
- The planning has been a collaborative effort of the County of Wellington and Township of Centre Wellington to stage parallel projects for the Badley Bridge and Victoria Street bridges. This allows the construction of the Badley Bridge to utilize the new Victoria Street Bridge for traffic management, therefore minimizing business impacts to local businesses.
- The structural design for the new bridge involved input from cultural heritage specialists. The design complies with current best practices in heritage conservation laid out in the national Standards and Guidelines for the Conservation of Historic Places in Canada. The new design is compatible with, subordinate to and distinguishable from the significant cultural heritage setting in which it is located. The design also complies with the MTCS referenced Standards and Guidelines for provincially owned heritage bridges.
- The proposed 3 span structure will accommodate all modes of transportation as part of the County road network.
- The new structure will accommodate climate change and future design storms associated with larger design storms on the Grand River.

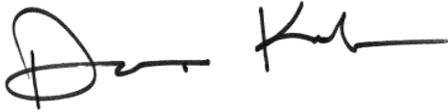
Documentation from the Public Information Centre (PIC) is provided in **Attachment 4**. The main discussion point from the PIC focused on the proposed design of the gateway feature. The County is committed to constructing a gateway feature and will be seeking further community input for design modifications.

To satisfy the requirement to provide traceability of the decision-making process and to provide the project rationale as required by the Ministry's conditions, the County has posted this submission to the MECP on our web site.

With this letter and attachments, we believe that the County of Wellington has now satisfied the conditions imposed by the Ministry. At this time, we are seeking your Ministry's approval with respect to compliance with the imposed conditions in order for the project to proceed. Construction for the bridge replacement is scheduled to begin in fall 2019.

Please do not hesitate to contact me if you have any additional questions or concerns.

Yours truly,

A handwritten signature in black ink, appearing to read 'Don Kudo'. The signature is fluid and cursive, with a large 'D' and 'K'.

Don Kudo, P.Eng.
County Engineer, Wellington County

cc Steve Taylor, P.Eng., M.Eng. Project Manager, BTE
Kelly Linton Warden, Wellington County
Shannon Gauthier, Project Evaluator, Ministry Environment, Conservation and Parks
Katherine Kirzati, Heritage Planner, Ministry Tourism Culture and Sport
Colin Baker, Managing Director of Infrastructure Services, Township of Centre Wellington