

## Review Agency Comments



June 7, 2024

Josh Kavanagh  
Township of Ramara  
Director of Infrastructure  
jkavanagh@ramara.ca

Suzanne Troxler, P. Eng.  
Tatham Engineering  
Senior Engineer  
stroxler@tathameng.com

Dear Josh Kavanagh and Suzanne Troxler,

***Re: Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental Assessment***

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Beef Farmers of Ontario (BFO) appreciates the opportunity to provide our comments to the Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental Assessment. BFO represents the 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

BFO is providing our comments to the Township of Ramara's Class Environmental Assessment as this matter has been brought to our attention by BFO members with farms neighbouring the effluent spray fields. Our members have communicated their serious concerns with the current process, the negative impacts to their properties, especially to their farmland, and health concerns for their families and their livestock.

Continuing on with the current effluent spray process is unacceptable. We were pleased to see in the Public Information Centre (PIC) Update presentation Problem Statement that public concerns with runoff and impacts on humans, farm animals, aerosols and drainage were referenced. We are also very pleased to see that the "Do Nothing" option, as presented during the session, will not be an option considered moving forward. The current system has not been operated according to the legally binding conditions of the environmental approvals and a new system must address these issues. There is a long history of complaints and non-compliance issues that have been left unaddressed and trust must be rebuilt with impacted stakeholders.

**We strongly believe the most environmentally sound, long-term solution is to process the sewage from Bayshore Village in an appropriate wastewater treatment plant with a tertiary-level or greater treatment system.**

Any solution chosen for addressing the sewage from Bayshore Village through the current Class Environmental Assessment process must ensure long term protection from pollution to neighbouring properties, ground and surface water, and the environment. The long-term solution

must also consider the damage and degradation of the existing spray fields and minimize, if not eliminate, their use for application in the future.

We have significant concerns about the continued use of spray irrigation of effluent. This is an outdated approach to the disposal of sewage effluent and it is crucial the Township of Ramara select a long term, viable option that encompasses modern, responsible wastewater treatment practices that are protective of human health and the environment.

Compliance issues that have occurred with the existing system, which have caused significant economic and quality of life impacts to neighbours, must not be repeated. The new system that is implemented must also include assurances that oversight and monitoring will be critical components, and that approval conditions will be enforced.

It has been stated that “additional field investigations (archaeological, geotechnical)” are taking place on the West field to investigate viability. We also request hydrogeological studies be completed on all fields/sites that are considered for use for this project. This is critical to ensure the protection of water sources, including the private well water used for households in the area.

The presentation at the PIC referenced precipitation patterns and quantities have changed since the existing system was originally designed. There is a history of the spray effluent fields not being able to accommodate the application and volume dating at least back to 1996 when an extension to the spray season was granted by amendment to the Certificate of Approval. Despite significant efforts to reduce the sewage generated in Bayshore Village, we believe the system must be designed with spare capacity, to account for these changing precipitation patterns along with the potential future increases to the population served by this system. In addition to this spare capacity, there must also be viable, detailed contingency plans.

Issues with the spraying of effluent on the fields and impacts to neighbouring property owners is longstanding. It is imperative the Township expedite implementation of a preferred solution that addresses the longstanding issues with the existing system, while providing responsible wastewater treatment for the long term.

Concerns have also been expressed about what will be done in the interim to address these longstanding issues. The interim plan, as presented during the PIC stated:

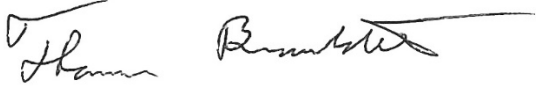
- Operate the spray fields in strict compliance with the Certificate of Approval
- Supervise the spray irrigation operation as per MECP requirements
- Repair piping and adjust spray heads in spray fields as needed
- Continue sanitary sewer repairs in Bayshore Village
- Implement the contingency plan (haulage) if needed

We believe these actions do not go far enough. As presented during the PIC, “soils appear to have become compacted and to have less infiltration capacity”, and it is increasingly difficult to dispose of all effluent from May to October due to weather and the available number of spray days is less than the number of spray days as designed by the process. Changes in climatic conditions, along with mismanagement of the spray effluent application, have in turn negatively impacted the ability of the system to function as designed.

Every effort must be made to ensure the current negative impacts to neighboring properties are eliminated immediately and to bring the system into operational compliance. This includes the use

of the haulage contingency plan, as needed. In addition to full compliance with the Certificate of Approval and Environmental Compliance Approval, it is critical compliance with any source water protection requirements is also demonstrated and enforced.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Brandstetter', with a long horizontal flourish extending to the right.

Thomas Brandstetter  
Manager of Policy and Issues

cc: Sebastian Bonham-Carter (MECP)  
MECP Barrie District Office  
Jim and June Newlands

**From:** [Darby Wheeler](#)  
**To:** [jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca); Suzanne Troxler;  
**Cc:** [junewlands@gmail.com](mailto:junewlands@gmail.com); [Sebastian.Bonham-Carter@ontario.ca](mailto:Sebastian.Bonham-Carter@ontario.ca); [sheri.broeckel@ontario.ca](mailto:sheri.broeckel@ontario.ca);  
**Subject:** Beef Farmers of Ontario Submission to Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental Assessment  
**Attachments:** [2024\\_06\\_07 Beef Farmers of Ontario Submission to Bayshore Village Effluent Spray Irrigation Class EA.pdf](#)  
**Sent:** 6/7/2024 6:30:06 PM

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Hi Josh and Suzanne,

Please find Beef Farmers of Ontario's submission to the Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental Assessment attached.

Best Regards,  
Darby



**Darby Wheeler**

Policy Advisor  
Beef Farmers of Ontario

Phone 519.824.0334 Mobile 613.360.4020

Web [www.ontariobeef.com](http://www.ontariobeef.com) | [www.ontbeef.ca](http://www.ontbeef.ca)

Email [darby@ontariobeef.com](mailto:darby@ontariobeef.com)

130 Malcolm Road, Guelph, ON N1K 1B1

*If you're in need of support, please reach out to the Farmer Wellness Initiative - from the tractor, from the barn, or from the house after the sun sets on another long day. Call 1-866-267-6255 or visit [www.farmerwellnessinitiative.ca](http://www.farmerwellnessinitiative.ca). Accessible 24 hours a day, seven days a week, every day of the year.*

**From:** [Simcoe County Federation of Agriculture](#)  
**To:** [jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca); Suzanne Troxler;  
**Cc:** [Source Water Chair Lynn Dollin](#); [b.thompson@lsrca.on.ca](mailto:b.thompson@lsrca.on.ca); [mhgwainman@gmail.com](mailto:mhgwainman@gmail.com); [4jfarms1996@gmail.com](mailto:4jfarms1996@gmail.com);  
[Minister.mecp@ontario.ca](mailto:Minister.mecp@ontario.ca); [sheri.broeckel@ontario.ca](mailto:sheri.broeckel@ontario.ca); Leah Emms; Paul Maurice;  
**Subject:** Municipal Class EA letter  
**Attachments:** [Bayshore village EA letter 2024.docx](#)  
**Sent:** 6/6/2024 9:52:22 PM

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Dear Mr. Kavanagh and Ms. Troxler,

The SCFA would like to share a letter with regards to the Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental assessment.

Thank you for your time,

Nicole Cross  
Office Administrator  
Simcoe County Federation of Agriculture

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June 7, 2024

Josh Kavanagh  
Township of Ramara  
Director of Infrastructure  
[jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca)

Suzanne Troxler, P. Eng.  
Tatham Engineering  
Senior Engineer  
[stroxler@tathameng.com](mailto:stroxler@tathameng.com)

Re: **Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental Assessment**

The Simcoe County Federation of Agriculture (SCFA) is one of 52 county and regional federations supported by the Ontario Federation of Agriculture across the province. We strive to develop and consolidate farmers' positions for the protection and promotion of activities with the County of Simcoe and the municipalities which will improve the welfare of the farmer and the agriculture industry. We also bring the viewpoints and concerns of our membership to the Ontario Federation of Agriculture (OFA) as well as facilitate the spread of information of concern within the agriculture industry to all farmers in the county. Ultimately, the SCFA primary goal is to advocates on behalf of farm families in Simcoe County on local agricultural issues.

We appreciate the opportunity to provide our comments to the Bayshore Village Effluent Spray Irrigation System Municipal Class Environmental Assessment.

We are very pleased to see that the “Do Nothing option has been eliminated from further consideration. Continuing with the status quo is not an option. The current approach of spraying effluent on nearby fields for disposal through evapotranspiration and infiltration is causing significant negative impacts on neighbouring farmers, and this cannot be permitted to continue. This current system has not been operated according to the legally binding conditions of the environmental approvals, and this legacy must not be handed over to a new system. There is a long history of complaints and non-compliance issues left unaddressed, so trust must also be rebuilt with the surrounding community.

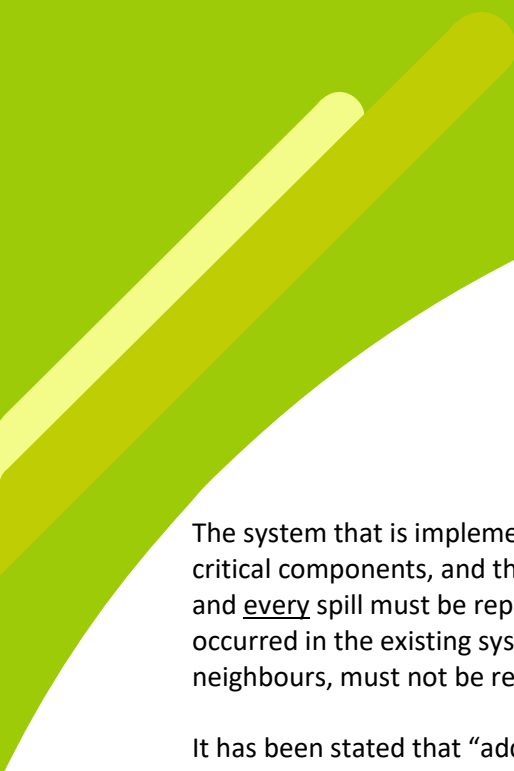
Ultimately, we believe the most environmentally sound, long-term solution is to process the sewage from Bayshore Village in an appropriate wastewater treatment plant with a tertiary-level or greater treatment system.

Any solution chosen for addressing the sewage from Bayshore Village through the current Class Environmental Assessment (Class EA) process must ensure long term protection from pollution to neighbouring properties, ground and surface water, and the environment. The long-term solution must also consider the damage and degradation of the existing spray fields and minimize, if not eliminate, their use for application in the future.

We have significant concerns about the continued use of spray irrigation of effluent. This is an antiquated approach to the disposal of sewage effluent. While it may have been a common practice in the 1980's when this system was originally developed, that is no longer the case. It is crucial that Ramara Township hold themselves accountable for utilizing the technology and knowledge available to them, to move beyond a 'reduced potential for run-off, negative impacts to surface water and aerosols' minimum approach to wastewater disposal, and to select a long term, viable option that encompasses modern, responsible wastewater treatment practices that are protective of human health and the environment.

Any new treatment system must be diligent in providing appropriate levels of wastewater stabilization. For instance, the proposed addition of UV treatment noted in a few alternatives under consideration must involve installation of approved infrastructure that provides measurable UV disinfection of wastewater effluent. The effect of UV as sunlight on the existing lagoons is not a viable UV treatment.





The system that is implemented must also include assurances that oversight and monitoring will be critical components, and that approval conditions will be enforced. The system must run as designed, and every spill must be reported and appropriately rectified. The lapses in compliance that have occurred in the existing system, which have caused significant economic and quality of life impacts to neighbours, must not be repeated.

It has been stated that “additional field investigations (archaeological, geotechnical)” are taking place on the West field to investigate viability. We also request hydrogeological studies be completed on all fields/sites that are considered for use for this project. This is critical to ensure the protection of water sources, including the private well water used for households in the area. SCFA would also like assurances that any new solutions or approaches are consistent with local source water protection policies.

The presentation at the Public Information Centre Update held May 22, 2024, referenced that precipitation patterns and quantities have changed since the existing system was originally designed. There is a history of the spray effluent fields not being able to accommodate the application and volume dating at least back to 1996 when an extension to the spray season was granted by amendment to the Certificate of Approval. Despite significant efforts to reduce the sewage generated in Bayshore Village, we believe that the system must be designed with spare capacity, to account for these changing precipitation patterns along with the potential future increases to the population served by this system. In addition to this spare capacity, there must also be viable, detailed contingency plans.

Since this Class EA is updating and finalizing efforts from 2017, time is of the essence. Little has been done to move the issues identified with the spray effluent treatment approach since 2017. It is imperative that Ramara Township expedite implementation of a preferred solution that addresses the long-standing issues with the existing system, while providing responsible wastewater treatment for the long term.

SCFA is also concerned about the operation of the existing spray effluent system in the interim, until the new system is implemented and functional. The slide deck presented on May 22, 2024, stated that, in the interim, the Township is committed to:

- Operate the spray fields in strict compliance with the Certificate of Approval
- Supervise the spray irrigation operation as per MECP requirements
- Repair piping and adjust spray heads in spray fields as needed
- Continue sanitary sewer repairs in Bayshore Village
- Implement the contingency plan (haulage) if needed

While we are supportive of these compliance measures, we believe they do not go far enough. Tatham Engineering very clearly states that the “soils appear to have become compacted and to have less infiltration capacity” and that “the system was designed with the basis that there would be less rain than has been in the last 10 years – so there has been change over time of the soil, of the weather...” These changes in climatic conditions, along with mismanagement of the spray effluent application, have in turn negatively impacted the ability of the system to function as designed.

Tatham Engineering reports also demonstrate that the spray effluent system is not operating as designed, specifically with respect to spare capacity so that fields can be taken out of service for aeration/tilling, spraying for short periods of time daily to not exceed soil absorptive capacity, varying application rates to accommodate soil hydraulic capacity to prevent runoff and ponding and fulltime oversight to monitor and respond immediately to incidences of ponding, pooling or runoff. Instead, one maximum application rate is applied to all fields concurrently, for seven to eight hours per day, and with no full-time oversight.

Further, extension of the spray effluent season is regularly requested, as the volume of wastewater cannot reasonably be managed during the approved spray period of May 18 through September 28 annually. Requests for relief from the spray application season can be traced back to 1996, the year the current Certificate of Approval was issued.

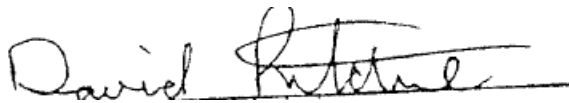
The need for an extended spray season is exacerbated by a lack of reserve capacity in the current lagoon operating system. While recent efforts to decrease flow through inflow and infiltration work are appreciated, there is still a lack of capacity to achieve appropriate lagoon retention time, ensuring treatment and stabilization of wastewater prior to spraying, and to store effluent on an annual basis.

Every effort must be made to ensure that the current negative impacts to neighboring properties are eliminated immediately and to bring the system into operational compliance. This includes the use of the haulage contingency plan, as needed.

In addition to full compliance with the Certificate of Approval and Environmental Compliance Approval, it is critical that compliance with any source water protection requirements is also demonstrated and enforced.

The Simcoe County Federation of Agriculture welcomes any opportunity to discuss our concerns and recommendations in further detail. We trust that our opinions will be given due consideration in the decision-making process.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Ritchie", with a stylized flourish at the end.

Dave Ritchie  
President of the Simcoe County Federation of Agriculture

Cc: MECP Minister's Office – [Minister.mecp@ontario.ca](mailto:Minister.mecp@ontario.ca)  
MECP Barrie District Office - [sheri.broeckel@ontario.ca](mailto:sheri.broeckel@ontario.ca)  
[Lynn Dollin, Chair, South Georgian Bay Lake Simcoe Region Source Protection Committee](#)  
[Bill Thompson, Manager Watershed Plans and Strategies, Lake Simcoe Region Conservation Authority](#)  
[Mark Wainman](#)  
[Jim and June Newlands](#)

**From:** [EA Notices to CRegion \(MECP\)](#)  
**To:** [Emily Park](#); [Suzanne Troxler](#);  
**Cc:** [jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca); [DMarks@ramara.ca](mailto:DMarks@ramara.ca); [Brad Laking](#);  
**Subject:** RE: Bayshore Village Effluent Spray Irrigation System Municipal Class EA Update - Notice of Public Information Centre (Tatham File No. 100080)  
**Sent:** 5/21/2024 3:00:28 PM

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Hi Emily,

Thanks so much for sending along the Notice of PIC for the Bayshore Village Effluent Spray Irrigation System Municipal Class EA. We've filed it for our records.

Kind regards,

**Krish Selvakumar, MFC (he/him)**  
**Environmental Resource Planner/Assessment Coordinator**  
Environmental Assessment Services Section  
Environmental Assessment Branch  
Ministry of the Environment, Conservation and Parks  
T: (437) 240-5922 | [krishna.selvakumar@ontario.ca](mailto:krishna.selvakumar@ontario.ca)



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**From:** Emily Park <[epark@tathameng.com](mailto:epark@tathameng.com)>  
**Sent:** May 7, 2024 1:17 PM  
**To:** Emily Park <[epark@tathameng.com](mailto:epark@tathameng.com)>; Suzanne Troxler <[stroxler@tathameng.com](mailto:stroxler@tathameng.com)>  
**Cc:** [jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca); [DMarks@ramara.ca](mailto:DMarks@ramara.ca); Brad Laking <[blaking@tathameng.com](mailto:blaking@tathameng.com)>  
**Subject:** Bayshore Village Effluent Spray Irrigation System Municipal Class EA Update - Notice of Public Information Centre (Tatham File No. 100080)

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Good afternoon,

The Township of Ramara is hosting a Public Information Centre on May 22, 2024, for the Bayshore Village Effluent Spray Irrigation System Municipal Class EA update. Please find attached the Notice of Public Information Centre.

We welcome all questions, concerns, and input as we proceed with the study.

Please advise if further notices and communications should be sent to a different contact within your organization or if you do not want to receive any further notices of this study.

Thank you,

Emily Park



**Emily Park** EIT  
Engineering Intern

[epark@tathameng.com](mailto:epark@tathameng.com)  
41 King Street, Unit 4, Barrie, Ontario L4N 6B5

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**From:** [Coordinator LRC HSM](#)  
**To:** [Suzanne Troxler](#)  
**Cc:** [jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca)  
**Subject:** Municipal Class EA for Effluent Spray Irrigation System  
**Sent:** 5/14/2024 1:18:23 PM

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Good Afternoon,

Thank you for including the Historic Saugeen Métis (HSM) in your consultation efforts via mailed letter regarding the Bayshore Village Effluent Spray Irrigation System Municipal Class EA Update. While HSM is pleased to be considered, unfortunately the project is well beyond the boundaries of the traditional harvesting territory of the Historic Saugeen Métis, and as such, we cannot provide comments on the project.

Thank you for your consideration.

Regards,

Georgia Lumley

Coordinator, Lands, Waters & Consultation  
Historic Saugeen Métis  
204 High Street  
Southampton, ON  
[saugeenmetis.com](http://saugeenmetis.com)  
519.483.4000



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## ALDERVILLE FIRST NATION

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Fax: (905) 352-3242  
[www.alderville.ca](http://www.alderville.ca)

Chief: Taynar Simpson  
Councillor: Dawn Marie Kelly  
Councillor: Lisa McDonald  
Councillor: Nora Sawyer  
Councillor: Jason Marsden

VIA E-MAIL

June 13, 2024

Josh Kavanagh  
Township of Ramara  
Director of Infrastructure  
2297 Highway 12  
Breachin, Ontario, L0K 1B0  
Tel: 705-484-5374 ext. 290  
Email: [jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca)

Dear Josh Kavanagh,

### **RE: Bayshore Village Effluent Spray Irrigation System Municipal Class EA Update**

I would like to acknowledge receipt of your correspondence, which was received May 7<sup>th</sup>, 2024, regarding the above noted project.

As you may be aware, the area in which this project is proposed is situated within the Traditional Territory of Alderville First Nation. Our First Nation's Territory is incorporated within the Williams Treaties Territory and was the subject of a claim under Canada's Specific Claims Policy, which has now been settled. All 7 First Nations within the Williams Treaties have had their harvesting rights legally re-affirmed and recognized through this settlement (2018).

In addition to Aboriginal title, Alderville First Nation rights in its Reserve and Traditional Territory and/or Treaty Territory include rights to hunt, fish and trap, to harvest plants for food and medicine, to protect and honour burial sites and other significant sites, to sustain and strengthen its spiritual and cultural connection to the land, to protect the Environment that supports its survival, to govern itself, sustain itself and prosper including deriving revenues from its lands and resources, and to participate in all governance and operational decisions about how the land and resources will be managed, used and protected.

Alderville First Nation is requiring a File Fee for this project in the amount of \$300.00. This Fee includes administration, an initial meeting, project updates as well as review of standard material and project overviews. Depending on the number of documents to be reviewed by the Consultation Department, additional fees may apply.

*Proudly working together to build a prosperous and healthy environment that promotes independence, honours and respects our values, and enhances our way of life.*

**Please make this payment to Alderville First Nation and please indicate the project name or number on the cheque.** If you do not have a copy of Alderville First Nation's Consultation Protocol, it is available at: [alderville.ca/wp-content/uploads/2017/02/AFNProtocol2.pdf](http://alderville.ca/wp-content/uploads/2017/02/AFNProtocol2.pdf). Please note that the mapping in this document needs updating to reflect the Williams Treaties First Nations Settlement Agreement 2018.

In order to assist us in providing you with timely input, please provide us with a Notice of Request to Consult containing relevant information and material facts in sufficient form and detail to assist Alderville First Nation to understand the matter in order to prepare a meaningful response. Guidance for giving notice can be found on pages 11-12 of our Consultation Protocol. Based on the information that you have provided us with respect to the notice of the **Bayshore Village Effluent Spray Irrigation System Municipal Class EA Update**, Alderville First Nation may require a mutual agreement to establish a special consultation process for this project. After the information is reviewed it is expected that you or a representative will be in contact to discuss this matter in more detail and possibly set up a date and time to meet with Alderville First Nation in person or virtually.

Although we have not conducted exhaustive research nor do we have the resources to do so, there may be the presence of burial or archaeological sites in your proposed project area. Please note, that we have particular concern for the remains of our ancestors. Should excavation unearth bones, remains, or other such evidence of a native burial site or any other archaeological findings, we must be notified without delay. In the case of a burial site, Council reminds you of your obligations under the *Cemeteries Act* to notify the nearest First Nation Government or other community of Aboriginal people which is willing to act as a representative and whose members have a close cultural affinity to the interred person. As I am sure you are aware, the regulations further state that the representative is needed before the remains and associated artifacts can be removed. Should such a find occur, we request that you contact our First Nation immediately.

Furthermore, Alderville First Nation also has available, trained Archaeological Liaisons who can actively participate in the archaeological assessment process as a member of a field crew, the cost of which shall be borne by the proponent. Alderville First Nation expects engagement at Stage 1 of an archaeological assessment, so that we may include Indigenous Knowledge of the land in the process. We insist that at least one of our Archaeological Liaisons be involved in any Stage 2-4 assessments, including test pitting, and/or pedestrian surveys, to full excavation.

Although we may not always have representation at all stakeholders' and rights holders' meetings, it is our wish to be kept apprised throughout all phases of this project.

Should you have further questions or if you wish to hire a liaison for a project, please feel free to contact Julie Kapyrka, Consultation Coordinator, at 905-352-2662 or via email at [jkapyrka@alderville.ca](mailto:jkapyrka@alderville.ca).

Yours sincerely,



Chief Taynar Simpson  
Alderville First Nation

*Proudly working together to build a prosperous and healthy environment that promotes independence, honours and respects our values, and enhances our way of life.*



**Ministry of Citizenship  
and Multiculturalism**

Heritage Planning Unit  
Heritage Branch  
Citizenship, Inclusion and  
Heritage Division  
5th Flr, 400 University Ave  
Tel.: 416-301-4797

**Ministère des Affaires civiques  
et du Multiculturalisme**

Unité de la planification relative au  
patrimoine  
Direction du patrimoine  
Division des affaires civiques, de  
l'inclusion et du patrimoine  
Tél.: 416-3101-4797



June 5, 2024

EMAIL ONLY

Josh Kavanagh  
Director of Infrastructure  
Township of Ramara  
2297 Highway 12  
Breachin, ON L0K 1B0  
[jkavanagh@ramara.ca](mailto:jkavanagh@ramara.ca)

**MCM File** : 0020971  
**Proponent** : Township of Ramara  
**Subject** : Municipal Class Environmental Assessment Update – Schedule B –  
Public Information Centre  
**Project** : Bayshore Village Effluent Spray Irrigation System  
**Location** : Township of Ramara, Simcoe County

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Dear Josh Kavanagh:

Thank you for providing the Ministry of Citizenship and Multiculturalism (MCM) with the notice of Public Information Centre for the above-referenced project.

MCM's interest in this project relates to its mandate of conserving Ontario's cultural heritage, which includes:

- archaeological resources, including land and marine;
- built heritage resources, including bridges and monuments; and
- cultural heritage landscapes.

Under the EA process, the proponent is required to determine a project's potential impact on known (previously recognized) and potential cultural heritage resources.

**Project Summary**

The Township of Ramara is updating the Class Environmental Assessment (Class EA) that was previously completed in 2017 for the effluent spray irrigation system at the Bayshore Village Sewage Works. Treated effluent from the Bayshore Village sewage treatment lagoons is spray irrigated on two fields near Concession Road 8 and Sideroad 20. The Class EA is updating the evaluation of alternatives for effluent disposal to address current capacity and operational issues.

The Class EA update follows the Schedule B requirements of the Municipal Engineers Association (MEA) Municipal Class Environmental Assessment.

### **Identifying Cultural Heritage Resources**

While some cultural heritage resources may have already been formally identified, others may be identified through screening and evaluation.

### **Archaeological Resources**

Our records indicate that a Stage 1 archaeological assessment (AA) (under Project Information Form number P439-0197-2024) has been completed for this project. The Stage 1 report has been entered into the Ontario Public Register of Archaeological Reports. The Stage 1 report recommended Stage 2 AA for the entirety of the study area. Our records indicate that the Stage 2 AA has been initiated under Project Information Form number P1059-0151-2024.

Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommend that:

1. the archaeological assessment of the project area is complete and
2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy.

Proponents should wait to receive the MCM's review letter indicating that the report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities.

Proponents must follow the recommendations of the archaeological assessment report(s). MCM recommends that further stages of archaeological assessment (if recommended) be undertaken as early as possible during detailed design and prior to any ground disturbing activities.

### **Built Heritage Resources and Cultural Heritage Landscapes**

This EA project may impact built heritage resources and cultural heritage landscapes. Please advise whether the study area has been screened for built heritage resources or cultural heritage landscapes and/or is the subject of a cultural heritage assessment. If technical cultural heritage studies have been previously undertaken for this study area, please send us an electronic copy of the study(ies).

If the study area, including any temporary roads, detours or work areas associated with the project, has not been previously screened or assessed, then the Ministry's [Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes](#) should be completed to help determine whether this EA project may impact known or potential built heritage resources and/or cultural heritage landscapes.

If there is potential for built heritage resources and/or cultural heritage landscapes within the project area, then a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment should be undertaken for the entire study area during the planning phase and will be summarized in the EA Report. This study will:

1. Describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. The Ministry has developed screening

criteria that may assist with this exercise: [Criteria for Evaluating for Potential Built Heritage Resources and Cultural Heritage Landscapes](#).

2. Identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.
3. Recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.

Given that this project covers a large study area, MCM recommends that the Cultural Heritage Report is carried out so that step 1 described above is undertaken early in the planning process. Then, steps 2 and 3 can be undertaken once the preferred alternatives have been selected.

Cultural Heritage Reports will be undertaken by a qualified person who has expertise, recent experience, and knowledge relevant to the type of cultural heritage resources being considered and the nature of the activity being proposed.

Community input should be sought to identify locally recognized and potential cultural heritage resources. Sources include, but are not limited to, municipal heritage committees, historical societies and other local heritage organizations.

Cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.

### **Environmental Assessment Reporting**

All technical cultural heritage studies and their recommendations are to be addressed and incorporated into EA projects. Please advise MCM whether any technical cultural heritage studies will be completed for this EA project, and provide them to MCM before issuing a Notice of Completion or commencing any work on the site. If screening has identified no known or potential cultural heritage resources, or no impacts to these resources, please include the completed checklists and supporting documentation in the EA report or file.

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

- Karla Barboza, Team Lead - Heritage | Heritage Planning Unit (Citizenship and Multiculturalism) | 416-660-1027 | [karla.barboza@ontario.ca](mailto:karla.barboza@ontario.ca)
- Liam Smythe, Heritage Planner | Heritage Planning Unit (Citizenship and Multiculturalism) | 416-301-4797 | [Liam.Smythe@ontario.ca](mailto:Liam.Smythe@ontario.ca)

Thank you for consulting MCM on this project and please continue to do so throughout the EA process. If you have any questions or require clarification, please do not hesitate to contact me.

Sincerely,

Liam Smythe  
Heritage Planner  
Liam.Smythe@ontario.ca

Copied to: Emily Park, Tatham Engineering  
Suzanne Troxler, Tatham Engineering  
Brad Laking, Tatham Engineering  
Dyana Marks, Township of Ramara  
Karla Barboza, MCM

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. The Ministry of Citizenship and Multiculturalism (MCM) makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MCM be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

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

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