



Hamilton

City Hall, 71 Main Street West
Hamilton, Ontario,
Canada L8P 4Y5
www.hamilton.ca

Guy Paparella, Director of Growth Planning
Planning and Economic Development Department
Growth Management Division
71 Main Street West, 6th Floor, Hamilton, ON L8P 4Y5
Phone: 905.546.2424 Ext. 5807 Fax: 905.540-5611
Email: guy.paparella@hamilton.ca

July 10, 2017

Ministry of Infrastructure
Natural Gas Grant Program

**RE: City of Hamilton (“City”) Letter of Comment
Financial Contribution to Union Gas Sheffield Expansion Project (“Project”)**

The City’s interest in the Project relates to how it may impact the environmental and financial well-being of the municipality, as well as the health, safety and well-being of its inhabitants.

Please note that Union Gas had contacted the City on May 12, 2017, with respect to the potential Project for the expansion of Natural Gas Services by Union Gas Limited, to the Sheffield Rural Settlement Area, applied for under the Ministry of Infrastructure Natural Gas Grant Program.

As per Section 4 of the Ministry of Infrastructure Natural Gas Grant Program 2017 Program Guidelines, in review, the City supports the expansion of natural gas services to the Sheffield Rural Settlement Area; however, **the City is not in a position to make any financial contributions to this Project**, as per the rationale documented below:

Rationale for No Financial Contribution:

Financial Concerns:

Staff was unable to document the financial implications of the Natural Gas Grant Program and request for Financial Contribution, due to internal deadlines and availability of Council meetings. As such, the City was not provided sufficient time to complete a thorough financial analysis and evaluation of the potential implications of making a financial contribution to this Project.

In particular, albeit the City did receive mapping and high level tax information from Union Gas Limited at the beginning of June, additional information, including but not limited to, the type, length, and diameter of the pipeline, and the rate applied for property assessment purposes would be required together in consultation with the Municipal Property Assessment Corporation (MPAC) in order to validate the estimated property tax figure provided.

Natural Heritage Concerns

Similar to the above, the City was not afforded sufficient time to review the proposed routing of the expansion of natural gas services to the Sheffield Rural Settlement Area and the potential natural heritage implications. However, based on a high level cursory review, it is noted that the proposed expansion pipeline route traverses the Natural Heritage System as per Schedule “B” of the Urban Hamilton Official Plan.

Source Water Protection Concerns

The Sheffield Rural Settlement Area is highly sensitive to groundwater contamination given portions of the community have exposed bedrock at surface, and this bedrock is known to be karstic (i.e. highly fractured bedrock which can allow for rapid migration of contaminants at or near the surface).

As a result, in order to determine potential impacts, a Groundwater Impact Assessment is required to be completed, documenting the depth of installation, installation and construction methods, potential dewatering needs for installation or ongoing maintenance, and a discussion on pipeline contents (pure methane, liquefied petroleum gas, etc.). This is required to identify the potential risks to groundwater contamination, and if mitigation strategies would be necessary.

Cultural and Built Heritage Concerns

The Project area meets five (5) of the ten criteria used by the City of Hamilton and Ministry of Tourism, Culture and Sport for determining archaeological potential:

- Within 300 metres of a primary watercourse or permanent waterbody, 200 metres of a secondary watercourse or seasonal waterbody, or 300 metres of a prehistoric watercourse or permanent waterbody;
- Along historic transportation corridors;
- In the vicinity of distinctive or unusual landforms;
- Proximity to known historic activities, events, or occupations; and,
- Proximity to archaeological sites.

These criteria define the property as having archaeological potential. Accordingly, Section 2 (d) of the Planning Act and Section 2.6.2 of the Provincial Policy Statement apply to the lands in question. It should be noted that the proposed gas line expansion follows historic roadways (transportation routes). The proposed gas line is located immediately adjacent to a number of historic properties (churches, businesses, and a school) and a number of former farmsteads that have the potential to lead to deposited historical material (G. Culham, J.G. Cochrane, W. Carismore, D. Lundy, L. Grummet, J. Keachie, and W. Main).

Therefore, an archaeological assessment would be required as part of the Project.

Lastly, should any impacts of the proposed gas line be anticipated to built heritage structures along each of the corridors, Heritage Planning Staff are to be contacted.

Partnerships and Innovation (Secondary) – Expansion Stream Evaluation Criteria

As per Section 6 of the Ministry of Infrastructure Application Guideline, the City was not provided sufficient time to evaluate partnering and the timing of project construction, in order to leverage other municipal works occurring along the same corridor.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Guy Paparella
Director of Growth Planning

C.C. Union Gas Limited
c/o: Mark Lawson
777 Bay Street, Suite 2901,
Toronto ON M5G 2C8

Councilor Robert Pasuta (Ward 14)

Councilor Judi Partridge (Ward 15)