

June 2nd, 2020

Jeremy Vink, Manager of Planning
Development Services
Township of Woolwich
24 Church Street West
Elmira, ON N3B 2Z6

Dear Mr. Vink:

**RE: CAPITAL PAVING SHANTZ STATION PIT: RESPONSE TO CULTURAL HERITAGE IMPACT
STUDY PEER REVIEW, OUR FILE "16313 B"**

Further to your earlier correspondence providing the additional Peer Review comments prepared by Letourneau Heritage Consulting Inc. on April 6th, 2020, MHBC has prepared the following responses to aid in resolving any outstanding questions from the peer reviewer.

Background

Letourneau Heritage Consulting previously provided a detailed peer review of the cultural heritage aspect of the proposed Shantz Station Pit. This was provided to MHBC for review by Township staff, and a response with report addendum was submitted to Township staff by MHBC on March 11th, 2020. Letourneau Heritage Consulting recently provided additional review and comments for information.

The most recent peer review comments consist of a cover letter providing an opinion of the MHBC response, as well as some additional questions to be addressed. A summary of the key points from the original peer review was also attached for reference, as well as the MHBC response / addendum.

It is noted in the most recent peer review response that Letourneau Heritage Consulting is satisfied with many of the responses provided, but there are some points that still need to be addressed. As such, the following has been structured to address each point raised by the peer reviewer.

Response to comments and questions

In order to best address some of the comments provided by Letourneau Heritage Consulting, MHBC determined an updated Cultural Heritage Impact Study would be preferred. The report includes additional information as requested by the peer review consultant, and also incorporates the previous addendum material into one document.

The following provides further discussion and elaboration on the additional comments provided in the peer review, and also references the location in the revised report where additional information can be found.

Comment	Response
<p><i>While LHC is satisfied with many of the responses provided by MHBC, the following points, in our professional opinion, still need to be addressed.</i></p> <p><i>1) Within the response to Point 1, MHBC noted that in their experience, historical/associative value is not typically addressed. This experience notwithstanding, the criteria for determine cultural heritage value and interest as established by the province (and referenced as the means by which significance is identified within the PPS) does identify historical/associative value as a criterion. This is also reflected in the Region's and Municipality's policies. Further, as there are questions if the properties within the Study Area are connected with the nearby Maryhill CHL, an analysis of the historical/associative value should still be completed.</i></p>	<p>Noted - thank you.</p> <p>The March 2019 MHBC Cultural Heritage Impact Study contained a review of the site history (Section 3.2), description of the resources (Section 4), as well as an evaluation of the cultural heritage resources based on the direction provided by the PPS and Ontario Heritage Toolkit (Section 5).</p> <p>This section (3.2) has been expanded in the May 2020 version of the report to now include a detailed history of the property ownership and development, which was also carried forward to the evaluation in Section 5 of the report.</p>
<p><i>2) Within the response to Point 1, MHBC noted that their analysis did consider the whole of the subject properties. As a point of clarification, the mapping provided within the CHIS did not always make this clear, and as part of the Addendum, new mapping should be provided showing both the property boundaries and the area of extraction. Further, while the response noted that the assessment typically addresses the area of proposed development, the applicable legislation nonetheless deals with the 'real property' which is why the clarification is being requested.</i></p>	<p>Acknowledged. As noted in the peer review response previously provided, the fieldwork covered the entire properties recommended for study by Township staff (1195 Foerster Road and 1472 Village View Road). The assessment of cultural heritage resources also covered the entire properties, as evidenced by photos and descriptions included in the Cultural Heritage Impact Study for areas outside the limits of extraction.</p> <p>In order to clarify regarding property boundaries, a new map has been added to Section 1 of the Cultural Heritage Impact Study which clearly shows the property boundaries and how they relate to the proposed licence boundary.</p>
<p><i>3) Within the response to Point 2, MHBC notes that they have provided a comparative analysis within their report. It would still be preferable to expand this analysis as in our professional opinion, the subject lands may not be significant from a physical/design value based upon our work within the Region. Still, identifying the properties as having physical/design value does not take away from the analysis, and provides more protection than if the properties were not identified as having significance for physical/design value.</i></p> <p><i>We still professionally disagree with the separation of the buildings and fields into discrete entries, and in our professional opinion, the properties should be considered as a coherent whole.</i></p>	<p>Based on analysis undertaken, the properties have been identified as having some cultural heritage value. The buildings are being retained as part of the proposed operation, landscape is being restored, and the identified value is being retained. Given the properties have been identified as having value, additional comparative analysis is not warranted or necessary.</p> <p>The intent of the evaluation was not to separate the properties into distinct components, but rather simply note that different areas were used for different purposes. The report has been clarified by removing the language from Section 5.3.</p>
<p><i>4) Within the response to Point 2, MHBC notes that it has provided descriptions of the vegetation</i></p>	<p>The report provides a comprehensive description of the properties in question, evaluates the resources and provides</p>

Comment	Response
<p><i>within Sections 4.1 and 4.2. This issue was identified because, from a third-party perspective, these descriptions would be enhanced by additional details.</i></p>	<p>recommendations based on the evaluation. No revisions necessary.</p>
<p><i>5) Within the response to Point 5, MHBC notes that it provided a discussion for alternatives in Section 8.1. This issue was identified because, from a third-party perspective, these descriptions would be enhanced by consideration of other alternatives than just the ones provided. Further, this response notes that in MHBC's professional opinion, the description of the post-operation restoration is sufficient. In our professional opinion, in reviewing the other documentation available for the project, there are more details than could be incorporated. As stated in the original peer review "Some of this material is available in other reports but still should be integrated."</i></p>	<p>Information regarding the proposed rehabilitation plan has been expanded in Section 6 of the revised report, and examples of Capital Paving rehabilitation efforts at other sites have been included as Appendix C.</p>
<p><i>6) Although the report does provide more details in terms of responding to the specific policies, in our professional opinion, the report should also address any applicable Provincial Policies as well as policies in the Regional Official Plan (as well as the more general policies of the local Official Plan).</i></p>	<p>The MHBC study includes a review of the applicable policy context of the Planning Act, Provincial Policy Statement, Region of Waterloo Official Plan, Township of Woolwich Official Plan and Ontario Heritage Toolkit in Section 2 of the report. The evaluation of resources was undertaken in accordance with current practices, policy requirements were followed, and applicable conclusions provided. At the request of the peer reviewer, additional details regarding the Township's Official Plan were added in order to provide additional clarity. These now form part of the report as Appendix B.</p> <p>In addition to the above, an expanded heritage evaluation through O. Reg. 9/06 has now been included in Section 5.</p>
<p><i>7) Lastly, while the CHIS addendum argues that there is a "low potential for impact, implementation and monitoring policies," we would again recommend the development of a temporary protection plan and monitoring measures as part of any operation plan. Based upon our experience elsewhere, these steps are important to clearly demonstrating a longer-term commitment to the conservation of the cultural heritage resources identified on-site. For example, there should be an expanded discussion around whether the vibrations from the excavation or heavy equipment could potential affect cultural heritage resources onsite and indicate how this will be monitored. Further, there should be some discussion around security and if any of the buildings will be vacant during the operation of the quarry. (If so, how will the buildings be security</i></p>	<p>The proposed Conservation Plan will include direction related to short-term and long-term matters to be considered for the conservation of the cultural heritage resources on the subject lands, including security should the buildings become vacant. Capital Paving has also added a note to the final ARA Site Plans indicating that if 1195 Foerster Road becomes vacant they will maintain it in the current state (the same commitment cannot be made for 1472 Village View Road since it outside the licenced boundary). In order to address the comment regarding protection, the scope of the Conservation Plans has been added to Section 8.2.</p> <p>Discussion on impacts of vibration has also been added to the revised report (see Section 7.1 and 8.3). No impacts related to vibration are expected, since there is no blasting to occur onsite (because of the nature of the resource – gravel vs stone) and distance of the buildings from the operations. However, the report now clarifies that should the extraction plan change,</p>

Comment	Response
<p><i>and monitored.)</i></p> <p><i>Thus, while the MHBC CHIS Addendum does respond well to many of the points raised within the Peer Review, in our professional opinion, there are still several issues that should be addressed as outlined above.</i></p> <p><i>We trust this helps you in your decision-making process, and as always, if there are any questions or concerns, please do not hesitate to contact the undersigned.</i></p>	<p>vibration monitoring may be required and this would be identified and monitored through the Conservation Plan.</p> <p>Noted. Addressed herein.</p> <p>Noted.</p>

Based on the above responses, it is our professional opinion that the study of cultural heritage resources through the Cultural Heritage Impact Assessment and Addendum prepared by MHBC (March 2019 / May 2020) is comprehensive and meets the requirements of the Township of Woolwich Official Plan, Region of Waterloo Official Plan, and Provincial guidance provided through the *Ontario Heritage Act* as well the Ontario Heritage Toolkit. The additional information and responses provided gives additional background and answers questions raised by the peer reviewer.

Closing

We trust the above and enclosed adequately addresses the additional comments provided by Letourneau Heritage Consulting Inc., and permits Township staff to move forward with finalizing a recommendation regarding this topic. Should there be any remaining questions please do not hesitate to contact MHBC.

Yours truly,

MHBC



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Associate



Dan Currie, MA, MCIP, RPP, CAHP
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cc. George Lourenco, Capital Paving
Neal DeRuyter / Caitlin Port, MHBC