

June 23rd, 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 FINAL CULTURAL HERITAGE
IMPACT STUDY PEER REVIEW, OUR FILE "16313 B"**

Thank you for providing recent correspondence from Letourneau Heritage Consulting Inc. (LHC) related to our response to their peer review. We are pleased to see that LHC is satisfied with the revisions and recommends acceptance of the revised cultural heritage report.

The letter from LHC dated June 12th, 2020 identifies a few remaining outstanding points, and recommends they be addressed in a follow-up letter. MHBC has prepared the following responses to the three remaining items:

- 1) *LHC strongly recommends that the Conservation Plan include a specific Temporary Protection Plan as part of its conservation approaches. This Conservation Plan, once developed, should be reviewed by the Township.*

It is intended that the Conservation Plan would include a temporary protection plan. To clarify this, the temporary protection plan will be identified as a specific chapter in the overall Conservation Plan so that the guidance is clear. It is also intended that Township staff be provided a copy of the Conservation Plan for further review.

- 2) *Slight clarification should be provided whether the property boundaries of the subject lands fall within the Maryhill CHL. While Figure 12 shows that the extraction area is outside the boundary, it is not clear if the properties are. If the properties do fall within the area, additional information should be provided outlining the relationship of the properties to the CHL. While the proposed project does not appear to have a significant impact (based upon the analysis provided), it should nonetheless be acknowledged if the broader lands fall within the CHL. (The report seems to refer to the subject lands and extraction area interchangeably – please see the language in Section 7.3.3 Conclusion).*

As noted in the CHIA, the area of proposed licence and extraction (i.e. 'subject lands') is located outside the Maryhill Candidate Cultural Heritage Landscape (CHL). The overall properties are also located outside of the CHL boundary with the exception of small portions of 1226 Maryhill Road and 1195 Foerster Road not associated with the proposed aggregate operation. As noted in the

MHBC CHIA, the subject lands do not form part of the village of Maryhill, are appropriately excluded from the CHL, are well-separated from the village, and extraction of aggregate resources will not cause direct or indirect impacts on the adjacent potential cultural heritage resources located within the Maryhill Candidate CHL.

- 3) *Within the Alternative Approaches Discussion (Section 8.1) the "do nothing" option discussion should be reworded to focus upon impacts to cultural heritage resources rather than the benefit of aggregate extraction.*

We appreciate the distinction by LHC regarding the rewording of approaches as set out in the report. While the CHIA notes the 'do nothing' approach would result in no aggregate extraction on the property, it is acknowledged that the 'do nothing' approach would also not result in any adverse effects on cultural heritage resources, given that no development would occur.

We trust the above provides the Township with a sufficient response to the final feedback from Letourneau Heritage Consulting Inc. Should you have any questions or require anything further, please do not hesitate to contact MHBC.

Yours truly,

MHBC



Nicholas P. Bogart, BES, MCIP, RPP, CAHP
Associate



Dan Currie, MA, MCIP, RPP, CAHP
Partner

cc. *George Lourenco, Capital Paving*
Neal DeRuyter / Caitlin Port, MHBC