



TECHNICAL MEMORANDUM:

To: Jeremy Vink MCIP RPP
Manager of Planning
Development Services
Township of Woolwich
24 Church Street West
Elmira, ON N3B 2Z6
via email at jvink@woolwich.ca

From: Marcus R Létourneau
Managing Principal, Letourneau Heritage Consulting Inc.
Suite 400 - 837 Princess Street
Kingston, Ontario K7L 1G8

Subject: Review of CHIS Addendum for Shantz Station Pit
(MHBC) dated March 11, 2020, LHC File LHC0189

Date: April 6, 2020

Please find attached a review of the CHIS Addendum for Shantz Station Pitt prepared by MHBC.

Peer Review Comments:

The Peer Review, undertaken by Letourneau Heritage Consulting Inc (LHC) considered two distinct aspects of the CHIS prepared by MHBC. This included the completeness of the application and the efficacy of the heritage planning argument. These comments are provided as Appendix A.

MHBC Response

MHBC provided a detailed response, hereto attached as Appendix B. This document provides both an addendum to the CHIS as well as a covering letter outlining how MHBC is responding to the individual point.

LHC Review of the MHBC Response

While LHC is satisfied with many of the responses provided by MHBC, the following points, in our professional opinion, still need to be addressed.

- 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.

- 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.
- 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.

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.

- 4) Within the response to Point 2, MHBC notes that it has provided descriptions of the vegetation 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.
- 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."
- 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).
- 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 and monitored.)

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.

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.

Sincerely,



Marcus R Létourneau, PhD, MCIP, RPP, CAHP
Managing Principal, Senior Heritage Planner,
Létourneau Heritage Consulting Inc.

Appendix A

LHC Peer Review Comments

1) Completeness of CHIS

Table 1: Requirements as outlined in MHSTCI Info Sheet #5 (Heritage Impact Assessments and Conservation Plans) (2006)

Requirements	Included in CHIS	Comments
<ul style="list-style-type: none"> • 1. Historical Research, Site Analysis and Evaluation 	<p>Partial</p>	<p>The properties are mostly adequately researched and evaluated using the appropriate methods. The CHIS should include an expanded analysis of the evolution of the properties and area. A more detailed mapping and air photo chronological evolution would have helped demonstrate changes over time, particularly as the report argues for a change in agricultural patterns over time.</p> <p>The CHIS has not included sufficient historical research to establish any historical/associative values the subject properties might hold. No ownership history, for example, has been included. The CHIS limits analysis to the proposed licensed extraction area. The focus should be on the real properties in their entirety. It is necessary to consider how the proposed development might impact the subject properties as a whole, not merely those parts that are located within the licensed extraction area.</p> <p>Given that the subject site extends onto the property located at 1226 Maryhill Road and that there is some concerns raised about impacts on the potential Maryhill CHL, the report, in the discussion of impacts to this potential CHL, should discuss the former aggregate extraction site on that property.</p>
<ul style="list-style-type: none"> • 2. Identification of the Significance and Heritage Attributes of the Cultural Heritage Resource 	<p>Partial</p>	<p>The report identifies that the residential structures and barns at 1195 Foerster Road and 1472 Village View Road have physical/design value as representative examples of typical agricultural properties. The report would benefit from a comparative analysis with other properties in the Township of Woolwich to determine if these particular properties are, in fact, good representations of the typology.</p> <p>The report has not considered whether these properties show associative or contextual value. Even if no value is found, the report must</p>

Requirements	Included in CHIS	Comments
		<p>demonstrate that these values have been considered.</p> <p>The report argues that the fields and building clusters of each property should be considered as discrete entities due to changes in the patterns of field use. It is our opinion that additional reasoning, or examples of precedents, is required to support this theoretical division.</p> <p>The report identifies the collection of trees framing the houses for the properties located at 1195 Foerster Road and 1472 Village View Road. It is unclear why other vegetation has not been considered, such as those marking field boundaries and laneways or those comprising the woodlot at the northern border of 1195 Foerster Road.</p>
<ul style="list-style-type: none"> 3. Description of the Proposed Development or Site Alteration 	Yes	<p>The report identifies why the report is being required and discusses what type of works will be occurring on the subject site. It is recommended that the report clarify that the subject site straddles multiple properties and that only two have been assessed at the request of the Township of Woolwich.</p>
<ul style="list-style-type: none"> 4. Measurement of Development or Site Alteration Impact 	Yes	<p>The report includes an Impact Assessment Chart considering each of the identified cultural heritage resources.</p>
<ul style="list-style-type: none"> 5. Consideration of Alternatives, Mitigation and Conservation Methods 	Partial	<p>The report does not consider alternatives. The report includes a discussion of mitigation approaches. However, the discussion on post-operation restoration should be expanded in this report, particularly with the use of visuals on how the landscape will be restored. Some of this material is available in other reports but still should be integrated.</p> <p>The report does include some discussion of conservation approaches, but these could be augmented by considering conservation approaches employed in the field of industrial heritage including at historic pits and mines.</p>
<ul style="list-style-type: none"> 6. Implementation and Monitoring 	Partial	<p>The report does include a discussion of implementation, but additional details could be added regarding monitoring, including the appropriateness of using a "Temporary Protection Plan."</p>

Requirements	Included in CHIS	Comments
<ul style="list-style-type: none"> 7. Summary Statement and Conservation Recommendations 	Yes	The report does include this section.

In addition to the previous requirements, the municipality, within Section 11.11 of the Township of Woolwich *Official Plan*, has identified specific requirements for a Cultural Heritage Impact Study related to aggregate resources. These were included in the OP in 2010.

Table 2: Municipal CHIS Requirements

Requirements	Included in CHIS	Comments
a) an identification of the policy framework which is aimed at protecting cultural heritage resources, and an analysis of how this policy framework is being satisfied, or addressed as appropriate, by the subject proposal	Yes	A basic policy framework is included. It is recommended that a separate section (such as an appendix) be provided clearly showing how the proposed project addresses each policy (or if it is not applicable). Further, there should be a discussion of the policy framework for views, and if there are any identified heritage views.
b) an identification of all cultural heritage resources, including built heritage resources, archaeological resources, and cultural heritage landscapes, which may be impacted by the proposed operation; and	Partial	This section has been provided. As discussed above, we consider it necessary to further establish that the fields should be considered independently of the building clusters. Alternatively, the property, as a whole, should be considered. It does not appear that the Region of Waterloo was contacted to determine if they have identified any potential cultural heritage resources in the area.
c) the nature of the impacts on cultural heritage resources, how these impacts can be mitigated, the risks associated with mitigation, the remaining impacts after mitigation, and an identification of the significance of the remaining impacts.	Partial	As per the above, the report would benefit from additional details on monitoring, and a greater discussion of longer-term potential impacts. The discussion of the potential requirement for a Temporary Protection Plan would be appropriate. As per the policy, there should be an expanded discussion of HOW the mitigation measures will lessen any impact.

2) Comments on the Efficacy of the Heritage Planning Argument

In addition, the following comments were provided regarding the relative strength of the heritage planning argument.

- 1) Limited discussion of the evolution of the properties over time:
 - a. The report mentions that a series of aerial photographs were considered to determine that a shift in patterns of use had occurred. The report relies entirely upon comparing a 1954 aerial photograph with 2018 in order to claim that the field portion of each property should be considered a distinct landscape from the building clusters. The analysis should be expanded to include:
 - i. Additional aerial photographs and/or historical maps to show the evolution of the properties over time;
 - ii. Further discussion of changes that may have occurred to known or potential built heritage resources on the properties (e.g. do changes to the farmhouses over time erode heritage value as does a change in field use patterns?)
 - iii. Additional materials on the history of the properties including brief description of whether past owners or uses may have been significant to the community and a brief description of how and when the original 350-acre lot was subdivided over time.
 - iv. In addition to describing how the subject properties have changed over time, the report should expand on its discussion of the broader context of the properties. A number of properties surrounding the subject site no longer have an agricultural land use such as the adjacent golf course. In particular, it would seem relevant to include a brief discussion of the former aggregate extraction that occurred immediately to the north of the subject site, particularly with reference to the properties' relationship to the potential Maryhill CHL as this former extraction area occupies the intervening land between the subject properties and the potential CHL. It may shed light upon if and how the local landscape has already been altered.
- 2) Unclear scope of the area being considered:
 - a. The report should consider the limits of any affected "real property" as the basis and limits of its analysis. As discussed, the report focuses on the limits of the extraction area, but the project is located across several parcels. Section 26 of the *Ontario Heritage Act* makes it clear that the entirety of a real property is considered under the Act, noting that "property means real property and includes all buildings and structures thereon." It is necessary, particularly regarding the question of adjacency under the PPS, to acknowledge that the subject site extends beyond the boundaries of the proposed licensed area to encompass five discrete properties. It is recommended that the report be revised to make clear the boundaries of these properties, particularly as the report explicitly addresses the built resources on 1472 Village View Road, yet has not included these in maps of the study area nor made clear the extent of any of the subject properties and whether any additional resources might be present on them. It is also suggested that the author(s) acknowledge all of the properties that comprise the proposed licensed extraction area and note explicitly that the Township has requested analysis only of 1195 Foerster Road and 1472 Village View Road (if this is indeed the case).

3) Insufficient 9/06 evaluation:

- a. The report provides a full analysis of the physical or design value of the subject properties' built resources and addresses briefly historical/associative value, but does not address any potential contextual value of the subject properties. Further, the Region of Waterloo sets out criteria for the evaluation of cultural heritage landscapes based upon O. Reg. 9/06 criteria including design, associative, and contextual values, which should be applied in this instance.¹

In our professional opinion, insufficient information has not been included to determine whether the properties may have historical/associative or contextual value (See 1) a. above). If no contextual value is found, this should be stated explicitly. A brief comparative analysis of farm complexes in the area should be completed to establish that the identified cultural heritage resources are exceptional enough to warrant conservation. The physical/design value assigned to these properties may be overly generous. Given that both properties have been altered over time, they may be unexceptional. There may be more representative examples of the typology within the area.

4) Undetermined regional interest:

- a. Given that the subject properties are located within a lower tier municipality, it would be appropriate to also contact the upper tier municipality to determine if there may be Regional interest in the cultural heritage value of the affected properties, particularly regarding those properties for which the Township of Woolwich has not requested a CHIS (e.g. 1226 Maryhill Road). It is noted that this approach has been applied for other recent CHISs in the municipality, and this report should be consistent with that approach.

5) Insufficient rationale for dividing properties into distinct parts (buildings/landscapes) for analysis:

- a. It is our professional opinion that the separation of the landscape into "building cluster" and "field" portions and assessing each independently is problematic. In this instance, the relationship between farm complex and surrounding fields is important both historically and in contemporary practice. While, based upon the information presented in the report and upon our own analysis, it does appear that the cultural heritage value of the properties may be limited to its built heritage resources, the properties should still be considered as a whole. It is suggested that the analysis should be reframed to indicate that the entirety of the properties has been considered for its heritage value, but that the heritage attributes are limited to the farmhouses and/or other buildings with the farm complexes. Alternatively, additional theoretical justification (e.g. precedents) are required to support this division.

The concern in this instance is that the division of the fields and the farm complex into distinct parts appears to apply inconsistent approaches to the issue of evolution. The report argues that due to changes to the landscape as a result of intensification of farming practices, the fields surrounding the building clusters should be considered independently of the buildings. The report also acknowledges that alterations have occurred to the farm complex buildings but continues to assign design value to them. Given that in the opinion of the authors that modifications do not undermine the value of the built heritage resources, they need to be clear why this is appropriate when considered the fields as having limited value for the same reasons.

¹ Region of Waterloo, Regional Implementation Guideline for Cultural Heritage Landscape Conservation (2013), Appendix B.

Appendix B
MHBC Response to LHC Peer Review Comments

March 11th, 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 Peer Review undertaken by Letourneau Heritage Consulting Inc. of the March 2019 Cultural Heritage Impact Assessment prepared by MHBC Planning, MHBC has prepared the following response / addendum to our report.

Summary of peer review

Letourneau Heritage Consulting provided a detailed peer review of the above-noted report, including background about applicable policies and guidance. The peer review report is well-researched, and provides commentary on various aspects of the subject proposal, as well as the MHBC report. There were some issues identified that would, in the opinion of the peer reviewer, be adequately addressed through an addendum or revised report in order to better support the heritage planning assessment.

It was the opinion of the peer review consultants that the reporting work undertaken by MHBC was acceptable, and there was agreement on the conclusions of the report that the proposed development does not have significant negative impact on onsite or adjacent cultural heritage resources. Additional details were requested to provide further justification for MHBC's position on some components so that it can be demonstrated that there are no concerns related to cultural heritage resources. This additional information was recommended, prior to the report being accepted by Woolwich Township.

Response to comments and questions

While there was general agreement on the overall conclusions of the report, it was noted additional detail would be useful in order to ensure the report was comprehensive in the analysis and conclusions. The purpose of the following section is to provide further discussion and elaboration on the comments provided in the peer review:

Topic	Comment / Response
<i>Table 1: Requirements as outlined in MHSTCI Info Sheet #5 (Heritage Impact Assessments and Conservation Plans, 2006) – pg. 49 of peer review</i>	
1. Historical research, site analysis and evaluation:	It was recommended that additional analysis of property evolution over time be included in the MHBC CHIA, through additional airphotos. While additional information was reviewed as part of the background

Topic	Comment / Response
	<p>research, only the 1954 and 2018 airphotos were included in the report. In response to this comment, additional information has now been included in the enclosed report addendum.</p> <p>The peer reviewer noted that additional research should be included to help determine historical / associative value. We note the scope of detail included is consistent with other aggregate resource projects where buildings are being retained, and that have been found acceptable by review agencies. No further information required.</p> <p>The peer reviewer noted the analysis was limited to the proposed licenced area, rather than the entire property. We note the fieldwork undertaken did include the entire properties located at 1195 Foerster Road and 1472 Village View Road, as recommended by Township staff. It is typical to focus assessment on the area where proposed development is taking place.</p> <p>The peer reviewer recommended the property located at 1226 Maryhill Road be included in the discussion of adjacent properties. We note this property was not identified as an adjacent cultural heritage resource, or flagged by Township staff, so was not included. However, the peer reviewer comment is valid in that further discussion about the former aggregate extraction on that property would be useful in the context of the proposed Maryhill CHL. Additional discussion has been added to the Addendum through the review of historical airphotos.</p>
<p>2. Identification of significant and heritage attributes of the cultural heritage resource</p>	<p>It was recommended that a comparative analysis of other properties in Woolwich to determine if the onsite examples are in fact good representations of the typology. We note the report discusses the typical Waterloo County farm layout in Section 5.3, and notes the subject lands contain examples of homes in that style.</p> <p>The peer reviewer noted the MHBC report was lacking information about associative or contextual value of the properties. This information is included in Section 5.2 of the CHIA report.</p> <p>It is noted in the peer review that the CHIA considers the buildings and fields as discrete entities, and additional reasoning is requested for the approach. We note it is typical in our assessments to examine both the field pattern and farm building cluster layout as two separate areas, as they are often separate entities within farm parcels. Where links between the two are present they are noted in our reports.</p>

Topic	Comment / Response
	The peer reviewer questions why additional detail has not been included about other vegetation on the properties, aside from the building clusters. The description of properties and photo documentation in Sections 4.1 and 4.2 of our report provides this information.
3. Description of the proposed development or site alteration.	The peer reviewer notes the MHBC report identifies why the CHIA is required and discusses the type of works proposed for the subject lands. It is recommended the CHIA also note the site occupies several properties but that only two are being assessed as directed by the Township. The MHBC report notes in Section 1 that the Township identified the two properties to focus on.
4. Measurement of development or site alteration impact.	The peer reviewer notes the CHIA report includes an impact assessment chart considering each of the resources.
5. Consideration of alternatives, mitigation and conservation methods	<p>The peer reviewer notes the MHBC report does not consider alternatives. We note that alternatives are considered within Section 8.1 of the report.</p> <p>It is recommended the discussion of mitigation include expanded information about post-operation restoration. We note Section 6.0 of the CHIA includes information about both the operation and restoration planned for the site. This information adequately describes the proposal.</p>
6. Implementation and monitoring	It is noted the MHBC report includes a discussion of implementation, but recommends additional monitoring details be incorporated. We note the CHIA report outlines the potential for impacts as being low, and recommends a conservation plan be prepared prior to the commencement of extraction activities. The conservation plan will provide details about conservation of the properties while operations are ongoing, including any temporary matters.
7. Summary statement and conservation recommendations	The peer reviewer notes this section is included.
<i>Table 2: Municipal CHIS requirements</i>	
a) An identification of the policy framework aimed at protecting cultural heritage resources, and an analysis of how this is being satisfied or addressed.	The peer reviewer notes the MHBC report includes a basic policy framework, and recommends a separate section be provided. While the CHIA concludes the proposal meets the applicable policy requirements, this information is included in the report addendum for convenience.
b) An identification of all cultural heritage resources which may be impacted by the operation.	The peer reviewer notes this has been provided in the MHBC report, but that additional justification is requested related to the assessment of fields separately. In addition, it is noted the Region does not appear to have been contacted to determine if any resources are present.

Topic	Comment / Response
	As noted above, MHBC has provided justification related to the assessment approach for fields and buildings. Regarding the Region of Waterloo, the inventories created by the Region were reviewed as part of the background research in order to determine nearby heritage resources. As noted in Section 4.3 of the CHIA, there were no other identified resources. In addition, Capital pre-consulted with Regional staff to discuss CHIA report requirements.
c) The nature of impacts on cultural heritage resources, how these can be mitigated, remaining impacts, and the identification of the significance of the impacts.	The peer reviewer recommends additional information be included in the MHBC report related to monitoring and potential impacts. The only impact identified in the CHIA is a minor temporary impact related to isolation of 1195 Foerster Road, however it is noted this is addressed through progressive rehabilitation back to agriculture. This topic is also discussed above in the responses to Table 1. The detail in the report is reasonable given the conclusions regarding the lack of impacts.

Further to the above commentary, the peer reviewer summarizes the remaining comments / issues into the following topics:

1. Limited discussion on the evolution of the properties over time
2. Unclear scope of the area being considered
3. Insufficient 9/06 evaluation
4. Undetermined Regional interest
5. Insufficient rationale for dividing properties into distinctive parts.

The above responses and information included in the addendum have provided the requested information and responses to the topics raised. Based on the above responses, it is our professional opinion that the Cultural Heritage Impact Assessment prepared by MHBC (March 2019) 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.

Closing

We trust the above and enclosed adequately addresses the comments provided by Letourneau Heritage Consulting Inc., but should there be any remaining questions please do not hesitate to contact MHBC.

Yours truly,

MHBC



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

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

Addendum to March 2019 Cultural Heritage Impact Assessment

(prepared by MHBC Planning / March 2020)

Introduction

Based on the comments provided by the Township of Woolwich peer reviewer (Letourneau Heritage Consulting), it was determined that an addendum to the March 2019 Cultural Heritage Impact Assessment (MHBC) was an appropriate means to provide the requested clarifications for a number of matters. As such, the following constitutes the required addendum, and should be read in conjunction with the March 2020 Peer Review Response prepared by MHBC, as well as the original March 2019 CHIA.

Airphoto and mapping review

The March 2019 Cultural Heritage Impact Assessment included a review of historic maps and airphotos in order to provide context to the site evolution. The report included a review of mapping from the mid-late 1800's, as well as current (2018) airphotos. Historic airphotos from 1954 were selected as an approximate mid-point between the County Atlas and current airphotos in order to give a snapshot of the changes that have occurred.

At the request of the Township peer reviewer, additional review was undertaken by MHBC in order to better document changes during the time periods not covered by the initial MHBC review.



1930 aerial photograph (source: University of Waterloo)



1966 aerial photograph (source: University of Waterloo)



2000 aerial photograph (source: Regional Municipality of Waterloo)

Based on a comparison between the various air photos, it is apparent the subject lands have continued to evolve over the decades since they were first settled. The additional air photos reviewed provide further context to the changes that have occurred in the earlier part of the 20th century as well as the start of the 21st century. Farm field patterns continue to evolve and change throughout the years, and the farm clusters have remained in their present locations. In the 2000 air photo from the Region of Waterloo, aggregate extraction occurring to the north of the subject lands is apparent.

Policy review

The Township of Woolwich Official Plan includes several criteria related to the study of cultural heritage resources in the context of development applications. These criteria are referenced in Section 2.3 of the March 2019 Cultural Heritage Impact Assessment, with a summary of policy conformity provided in Section 9.0 of the report.

In order to respond to comments from the peer reviewer, the following additional information is provided:

Official Plan reference	Discussion
Section 11.11.7 <i>a) an identification of the policy framework which is aimed at protecting cultural heritage resources, and an analysis of how this policy framework is being satisfied, or addressed as appropriate, by the subject proposal;</i>	A discussion of the policy framework aimed at protecting cultural heritage resources is included in Section 2.0 of the CHIA. The body of the report outlines how the policy framework is satisfied, with overall conclusions provided in Section 9.0.
<i>b) an identification of all cultural heritage resources, including built heritage resources, archaeological resources, and cultural heritage landscapes, which may be impacted by the proposed operation; and</i>	Cultural heritage resources have been identified in Section 4.0 of the CHIA, with an evaluation of significance included in Section 5.0 of the report. The onsite building clusters are found to have cultural heritage value, and nearby identified resources include the candidate Maryhill CHL and St. Boniface school.
<i>c) the nature of the impacts on cultural heritage resources, how these impacts can be mitigated, the risks associated with mitigation, the remaining impacts after mitigation, and an identification of the significance of the remaining impacts.</i>	Potential impacts are reviewed in Section 7.0 of the report, with reference provided to the guidance provided by the Province. Specific to the subject lands, impacts are reviewed in Section 7.1 and 7.2, with the conclusion being that potential for impacts is low. Specific to adjacent resources, impacts are reviewed in Section 7.3 and it is concluded there are no negative impacts anticipated on adjacent resources. Mitigation measures are identified to ensure conservation of onsite resources during extraction activities.

Conclusion

Based on the foregoing, it is concluded the proposed development will have no negative impacts on cultural heritage resources on and adjacent to the subject property, including the Maryhill Candidate CHL. Given the low potential for impact, implementation and monitoring recommendations have not been provided.