

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.