

**Ministry of Tourism, Culture  
and Sport**

Culture Services Unit  
Programs and Services Branch  
Culture Division  
401 Bay Street, Suite 1700  
Toronto ON M7A 0A7  
Tel: 416 314-7620  
Fax: 416 212-1802

**Ministère du Tourisme, de la Culture  
et du Sport**

Unité des services culturels  
Direction des programmes et des services  
Division de culture  
401, rue Bay, bureau 1700  
Toronto ON M7A 0A7  
Tél: 416 314-7620  
Télé: 416 212-1802



October 16, 2013

Colin Varley  
Senior Archaeologist and Heritage Planning Consultant  
Stantec Consulting Limited  
400-131 Clyde Ave  
Ottawa, ON K2C 3G4

**Project:** White Pines Wind Project  
**OPA Reference Number:** F-000675-WIN-130-601  
**Report Title:** Heritage Assessment Report (Revised October 15, 2013)  
**Applicant:** wpd Canada Corporation  
**Location:** Prince Edward County (South Marysburgh and Athol Townships)  
**MTCS File No.:** 13EA004

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Dear Mr. Varley:

This office has reviewed the above-mentioned report (the "Report"), which has been submitted to this ministry as required under O. Reg. 359/09, as amended (Renewable Energy Approvals under the *Environmental Protection Act*) (the "REA regulation"). This letter constitutes the Ministry of Tourism, Culture and Sport (the "Ministry") comments for the purposes of section 23(3)(a) of the REA regulation regarding the heritage assessment undertaken for the above project.

The Report recommends the following:

### **8.0 Recommendations**

The Heritage Assessment involved archival research, consultation with relevant groups and authorities and a visual survey of the Study Area. During the course of the assessment 103 potential cultural heritage resources were recorded. Of those, a total of 74 CHRs have been identified which meet the criteria for determining cultural heritage value or interest (CHVI) under O.Reg. 9/06. 12 protected properties, as identified in the table in Section 19, O.Reg.359/09 are located adjacent to the Project Location.

The potential for indirect impacts related to construction vibrations were identified for 20 cultural heritage resources located within 60 m of project components, including:

- 310 Bond Road;
- 3705 County Road 10;
- 757, 896, 919, 1038, 1071, 1106, 1112, 1177, 1210, 1247, 1327, 1375 Royal Road;
- The Royal Road Streetscape;

- Rose/Frost Farm Complex;
- 1078 Royal Road;
- The Royal Street Cheese Factory; and
- 45 and 114 Maypul Layn Road.

Although it is not expected that construction activities will result in any indirect damage as a result of vibrations, in order to minimize the risk of damage it is recommended that construction activities be avoided within 60 m of identified cultural heritage resources. Where construction within 60 m cannot be avoided, it is recommended that maximum acceptable vibration levels, or peak particle velocity (PPV) levels, should be determined by a qualified engineer prior to any construction activities (pre-construction survey). Construction within the 60 m bufferzone should be monitored to ensure that acceptable PPV levels are not exceeded. All construction activities should cease if levels are exceeded until an acceptable solution can be identified. Equal care should be applied during decommissioning activities to safeguard heritage resource, particularly with regards to vibration levels adjacent to the resources.

It is recommended that removal of or damage to trees along roads in the Study Area be avoided to the greatest extent practicable.

Other potential Project-related impacts related to views were also identified with respect to 21 cultural heritage resources, including:

- 104 Brewers Road;
- The Royal Road/Maypul Layn Road Streetscape and associated resources; and
- Henry House.

In order to mitigate any visual impacts, Turbine locations T07, T09, and T11 would have to be avoided. Turbine locations T07, T09, and T11 have been decided based on consideration of availability of land, and natural environment, noise, and property line setbacks, as defined in Ontario Regulation 359/09. Moving the turbines is not possible, due to these constraints, and avoidance/removal of the turbines will impact the economic viability of the project. Moving Project turbines to other locations in the County is also not possible, due to potential interference with Department of National Defence (DND) radar systems, as identified through consultations with DND. As the turbines are temporary in nature, a record of pre-construction conditions is necessary to provide a baseline for decommissioning activities. This should be established based on current land use at the Project Location which is documented in extensive detail in the Natural Heritage Assessment and Environmental Impact Study Report (NHA/EIS) completed as a component of the Renewable Energy Approvals process. Review of the NHA/EIS prior to decommissioning activities will ensure that decommission efforts will return the land as close to pre-construction conditions as is reasonable. The record of current conditions, including this Report and the NHA/EIS, should be deposited permanently at the local library to facilitate access to pre-construction conditions at the end of the Project lifespan.

In the case of the Royal Road/Maypul Layn Road Streetscape, it is recommended that any new transmission infrastructure be installed below-grade in order to preserve the character of the tree-lined streetscape linking the Maypul Layn dairy farms to the Royal Street Cheese Factory and nearby farmsteads. Landscaping features, such as fencing or vegetation, should not be removed for the installation of transmission infrastructure. Any such disturbances that cannot be avoided should be repaired immediately following Project

construction activities. Where possible, repair to landscaping features should restore the features to pre-construction conditions.

As a general recommendation, any extant cabins, log houses or built features encountered in wooded portions of the Study Area during the construction of Project infrastructure should not be removed without first undertaking a Heritage Impact Assessment of the resource.

Based on the information contained in the Report, the Ministry is satisfied that the heritage assessment process and reporting are consistent with the applicable heritage assessment requirements established in s. 23 of O. Reg. 359/09. Please note that the Ministry makes no representation or warranty as to the completeness, accuracy or quality of the heritage assessment report (please see Note 1).

This letter does not waive any requirements under the *Ontario Heritage Act*.

This letter does not constitute approval of the renewable energy project. Approvals or licences for the project may be required under other statutes and regulations. Please ensure that you obtain all required approvals and/or licences.

Please ensure that the proponent is aware that, if new information or substantive project changes arise after issuance of this letter, the applicant should discuss them with you to determine if any additional assessment or reporting is required. If additional reporting or revisions are required, they should be submitted to the Ministry for review. Upon completion of that review, the Ministry will determine if any revisions to the content of this letter are required.

Should you have any questions or require further information, please do not hesitate to contact me.

Sincerely,

**Paula Kulpa**

Team Lead - Heritage Land Use Planning

416-893-6977

Paula.Kulpa@ontario.ca

cc. Khlaire Parre, Director of Renewable Energy Approvals  
wpd Canada Corporation

Doris Dumais, Director  
Environmental Approvals Access & Service Integration Branch, Ministry of the Environment

Agatha Garcia-Wright, Director  
Environmental Approvals Branch, Ministry of the Environment

Chris Schiller, Manager  
Culture Services Unit, Ministry of Tourism, Culture and Sport

Meaghan Rivard, Heritage Consultant  
Stantec Consulting Ltd.

Note 1: In no way will the Ministry be liable for any harm, damages, costs, expenses, losses, claims or actions that may result: (a) if the Report or its recommendations are discovered to be inaccurate, incomplete, misleading or fraudulent; or (b) from the issuance of this letter. Further measures may need to be taken in the event that additional heritage resources are identified or the Report is otherwise found to be inaccurate, incomplete, misleading or fraudulent.