

SUMMARY COMMENTS

The following is a partial list of comments related to the revised heritage report. It represents primarily content issues (lack there- of) as opposed to process issues, which itself is fraught with problems including the irresponsible role of the Ministry of Tourism, Culture and Sport.(MTCS)

1. The original Heritage report was deemed by PEC Council (Sept 25, 2012 motion) to **be incomplete and inaccurate** and PEC Council refused to sign off on Municipal consultation until a revised heritage report was deemed acceptable. Indeed even MTCS requested Stantec/WPD to consult with the PEC Heritage Advisory Committee (PEHAC) and the PEC heritage community despite the MTCS having previously issued a “Comments Letter”.
2. On April 22 2014 PEC Council approved Motion CW 95-2014 (see Committee of the Whole April 10 Agenda item 7:10 and the attached STAFF REPORT) which concluded that the **revised heritage report was incomplete and deficient in the identification and assessment of the visual and construction impacts of the project on cultural heritage resources** within the study area AND further that the project should not be approved by the MOE.
3. The Prince Edward Heritage Advisory Committee (PEHAC) and others from the PEC heritage community have been actively involved in reviewing the report and engaging with the MTCS and MOE with respect to the process and content of this revised report and the separate heritage report. Most of their comments are included in the STAFF Report referenced in item 2 and PEHAC’s April 15th report is attached.
4. The submission of the revised heritage report to MTCS by Stantec prior to Stantec meeting with PEHAC to start the visualization process shows a total lack of respect to PEC Council and its citizens and totally ignores the cultural and economic value of the “sense of place” to PEC. At that point **no** visualizations had been.
5. That said how was MTCS supposed to offer any valued comment without visualizations? The MTCS Comment letter issued on Oct 16 2013 seems to copy the Stantec report with NO JUDGEMENTAL ANALYSIS.
6. PEHAC had requested 50 visualizations be done. On the Field trip of Feb 20,21 only 32 were attempted and only 12 were actually included in the report. In fact after Feb 21 contact was cut off with the PEC heritage community –no attempt was made to finish the 50 visualizations or involve them in selecting which were considered most relevant. This in essence guaranteed that Stantec’s report and analysis would be **incomplete**.

7. Even then this revised heritage report found that turbines T07, T11 and T09 will cause negative impacts to the attributes of 21 cultural heritage resources including 5 properties protected by municipal designation by-laws.(104 Brewers,940,1078 ,1112 Royal and 41 Lighthall). The report goes on to conclude mitigation changes (removal/ move) are not possible because of constraints of available land and of natural environment, noise and property setback issues and because of the impact on the economic viability of the project.

This is LUDICROUS! Why?

- the conclusion knowingly ignores the Provincial Policy Statement (PPS) 2005 and 2014 requirement 6.2.1 that significant heritage resources shall be conserved .The resulting disregard for the Municipality's designation bylaws undermines the whole basis of conclusions reached for all heritage resources in the project area.
 - economic factors are NOT relevant to heritage concerns nor the Green Energy Act(GEA).Furthermore(1) the original project was for 150 turbines, later reduced to 75) (2) WPD has continued securing leases since the project was announced....are we to believe they are securing leases on land they can't use? The statement is simply ludicrous and without proof.
 - the argument about DND issues is a red herring as the DND issues are related to a potential North Marysburg project NOT the White Pines project
 - HOW CAN THE LAYOUT BE FIXED and then the heritage study be done. Would common sense not dictate that you do the studies properly and then chose the turbine locations? If there are no proper locations then there is NO project.
8. The report is **incomplete** because it does NOT demonstrate clearly why negative visual impacts were not found to the heritage attributes of the other 7 protected properties in the area which share very similar cultural heritage values as the 5 protected properties affected by T07, T09 and T11.
 9. Similarly the report is **incomplete** because it does NOT show adequate analysis of why no adverse visual impacts were found for the other 67 identified cultural heritage resources (CHR)) ,both built resources and Cultural Heritage Landscapes(CHL)/streetscapes.
 - 10.The impact assessment is **faulty**; Why?
 - the MTCS guidelines do not limit the impact assessment to the 7 potential negative impact factors used but, in fact, encourage the development of further project specific ones.

- Obstruction is really the only factor discussed
 - negative impacts of Alteration, Shadows and direct and INDIRECT Obstruction per the MTCS guidelines are RELEVANT to landscape impact assessment especially if applied to comprehensive and detailed descriptions of specific CHLs, which are NOT provided in the report
- the impact is often evaluated with views only “straight on” or from xyz Road NOT 360 degree views. In much of the study area 360 degree views show that rural landscapes will be dominated by turbines - Royal, Bond, Walmesley, Cty Rd 10,13, Dainard, Brewers etc. People buy their homes and place buildings on their properties for views FROM their homes as well as At their homes. The “in the opinion of this study” statements do not adequately evaluate this aspect resulting in a report warped in favour of the wind company.
- there are issues with the structure and format of the reports which compound the **inadequacy of the impact assessment**. As an example; the grouping together of all CHRs on 1 street and the blanket analysis regarding potential negative impacts, comments and recommended mitigation means that the analysis is only partially applicable or useful to any 1 property and does NOT capture its specific character and hence fails to achieve the goal stated in 7.1.2 of identifying instances in which the addition of wind turbines will detract from heritage attributes or features from which the CHVL of specific cultural heritage resources are derived.

11. The problem of **faulty analysis** is paramount for views of Mount Tabor. Only a SW view is used. Views from the Mill Pond (Scotts Mill RD) of this major landmark show MAJOR visual detraction (see community visualizations).

12. Visualizations and analysis done for Walmsley Road rely on treating it as an axial street landscape whereas it can only be fully understood as a very distinctive CHL when it is recognized it curves and has 3 sharp right hand turns. The unusual road pattern creates surprises and character defining vistas as one goes from 1 section to another. “In the opinion of this study” **is not supported by evidence and analysis of the impacts of T01.T02, T03, T08, T09, T10.**

13. Since turbines can be removed after 40 years Stantec justifies the conclusion that damage is “reversible”. For current and next generations this is inappropriate and is justified by incomplete analysis and misuse of a reference from English Heritage.

14. **The report fails to adequately determine cultural heritage value or interest.** Why?

- it lacks in analysis, providing only background history and descriptions of settlement patterns, agriculture, physical setting.

- it does NOT characterize the evolved cultural landscapes and viewsapes
- frequently (Appendix A) the Cultural Heritage Value (CHV) for a property is not translated into attributes that are specific enough to measure impacts
- not all CHRs had landscape attributes identified (only 55 of 79); Only 74 of 103 properties assessed are noted for inclusion as meeting Cultural Heritage Value or interest(CHVI). **Inadequate research and inaccurate information** has led to a number of missed items including 4 older barns eg 471 Bond, 177 Brewers, 832 and 1106 Royal, Barn on Army Reserve Road, 2256 Cty Rd 13, 3942 Cty Rd 10.
- there is **a lack of comprehensive and rigorous analysis** based on the guidance in the Provincial Policy Statement (PPS) of all identified CHRs in the project area. Eg CHR-53 (Walmsley Rd), CHR 40 (long Point RD), CHR-54 (Royal Rd), CHR 55 (Milford).
- comparative analysis of the “record Forms” and in Table 3 reveal disconnected logic and uncoordinated analysis.

The cumulative effect of these errors, generalizations, lack of rigorous analysis and disconnects is to LIMIT the identification of cultural heritage values and attributes and hence MISS identifying cultural heritage value.

As can be seen a number of the impact assessments can be seriously challenged.

Per the PEC Council adopted motion, with proper analysis and proper impact assessment, the correction of this revised Heritage Assessment report for completeness and accuracy would likely result in the identification of other turbines that must be moved or removed. Examples include but are not limited to, T01, T04, T06, T08, T15, T17 and T29.

15. Shadow Flicker

Neither the original report nor revised report deal with this issue. Again the **report fails to meet the requirements of O.Reg 359/09**

16. **The original, revised and interconnection line reports identify potential damage to buildings** including designated historic homes due to construction vibration of the interconnection line. While Mitigation is suggested via the presence of a qualified engineer there is NO ultimate solution offered if ppv levels exceed the “safe” level. Further there is **NO analysis of the number of properties affected nor the actual distance from the proposed construction**. In fact some structures are within 10 meters so this “let us see what happens” approach is unacceptable.