

## COMMENTS

1. The mitigation proposed are not adequate. There is no ultimate solution provided should the ppv exceed the engineer's recommendation. For many places (eg Royal RD) poles are NOT an option as there is the potential of obstruction of cultural heritage landscapes and protected properties which the report has not addressed.
2. There is no means for affected owners to be assured the engineer is suitably qualified and available on site for the entire period required.
3. The analysis of the potential effect does not differentiate by "closeness or proximity" to the construction. There is no detail to back up the analysis. To remedy the absence of the necessary data the heritage community has evaluated each structure on the route.(see attached). On a cumulative basis there are 8 structures inside 10 meters, 52 inside 20m, 124 inside 30 and 165 inside 40 m. surely the potential damage is a function of proximity.
4. There is no requirement for pre and post examination and no compensation contemplated by wpd.
5. The use of Maypul Layne Road is too risky from an environmental perspective and was specifically prohibited by PEC Council through a Council motion.
6. In this regard the consideration of alternate routes to mitigate heritage concerns is deemed inadequate. Some of the options in the report seem ridiculous. The original location of the Substation (on a leased farm on Bond Road west of Milford) would have, at least avoided the substation abutting 2 protected properties the 2 protected properties, the necessity of potential damage to 4 protected buildings and allowed wpd to avoid Maypul Lane road. The location of the substation and transmission route should be redesigned .
7. The reports documentation is grossly inadequate (5 pages) .There was substantial input prior to release of the revised July version. Not including documentation of the consultation process after the application REA was filled in Sept 2012, is unacceptable especially for the Interconnection Line Report that was not considered as part of the original submission. Community input for the original April 2013 version and all subsequent communication with Stantec and/or involving the MTCS and MOE should be included. The lack of transparency is not in the public interest and contradicts the intent of the MOE's own Technical Guide as published.
8. The report contains inadequate and incomplete information. As an example only part of 1078 Royal is described. The report omits the 1840 log house and 1810 barn at 1078 Royal Road. The content of the Heritage Record Form for 1078 Royal Road is different for the Interconnection report than the main heritage study report. Both the log house and barn are separately

designated and designations are missing yet the designation text is missing. More than omissions of detail, these errors are evidence that Stantec did not, in fact, assess impacts for these buildings as required by the regulation.

9. While there may be no advertised additions to the heritage inventory listing, a review of PEHAC minutes would show several properties along the interconnection line that have requested designation. These include the Waring House property and 1071 Royal Road, both of which could be significantly affected.
  
10. The photos of heritage resources are misleading in that they have been selected to exaggerate the visual impression of existing hydro pole infrastructure in the landscape, whereas the actual height and spacing of poles that would be used (if any) is not described. In actual fact it is anticipated that for 69kV lines the poles would be at least 20 feet higher with closer spacing. In fact if poles are used the interconnection route would contain 2 independent transmission systems-1 for Ontario Hydro and 1 for WPD.....with the associated ugliness in a location of great heritage significance.

## Conclusion

Regulation directs the proponent to evaluate the impact of engaging in the renewable energy project on the heritage attributes and to provide recommendations for measures to avoid, eliminate or mitigate the impact. This report shows NO evidence of efforts to eliminate or avoid heritage damage and provides incomplete and poorly defined mitigation measures. An alternative transmission route should be designed that has significantly less negative implications to PEC heritage. This would likely include an alternative substation location. The use of Maypul Layne Road and Royal Road near the 4 designated(protected) structures is unacceptable.