

**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: 416 314-7145
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: 416 314-7145
Télé: 416 212-1802



December 10, 2014

Meaghan Rivard
Stantec Consulting Ltd.
49 Frederick Street
Kitchener, ON N2H 6M7
E: Meaghan.Rivard@stantec.com

Project:	Southgate Solar Project
OPA Reference Number:	F-003961-SPV-KC3-510
Report Title:	Heritage Assessment Report: Southgate Solar Project
Applicant:	Southgate Solar LP
Location:	Southgate Township, Grey County, Ontario
MTCS File No.:	0001705

Dear Meaghan Rivard:

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:

6.0 RECOMMENDATIONS

6.1 SUMMARY

The Heritage Assessment Report was executed according to the requirements of O. Reg. 359/09 Sections 19 and 23 as well as guidelines provided in the Bulletin (Government of Ontario 2013). Following a review of historic mapping, consultation with appropriate bodies, and two windshield surveys, a total of nine potential heritage resources were identified at the HAA. Upon review, eight resources were determined to satisfy criteria made under O. Reg. 9/06 indicating the presence of cultural heritage value or interest. As such, eight potential resources were determined to represent a heritage resource and therefore assessed to determine the impact of the Project on identified heritage attributes.

Project related impacts were identified including an anticipated change in land use resulting in the destruction and alteration of the agricultural land use and the potential vibration impacts to heritage resources resulting from construction activities. The change in land use will occur throughout the life of the Project and impact all heritage resources identified. Potential vibration impacts are restricted exclusively to Project construction and decommissioning activities and may only affect those heritage resources situated within 50 metres of the Project Location. Potential vibration impacts were identified for the following heritage resources:

- 392415 Sideroad 39 (CHR 1)
- 392433 Sideroad 39 (CHR 2)
- 392469 Sideroad 39 (CHR 3)
- 223585 Sideroad 22 (CHR 5)
- 223511 Sideroad 22 (CHR 7)

Following assessment, with regards to anticipated land use changes, it was determined that:

1. The change in land use is considered reversible;
2. The introduction of solar panels in the fields surrounding heritage resources does not disrupt or detract from an understanding of the historical relationship between the structures;
3. The introduction of solar panels will result in the loss of selected agricultural land use at the Project Location; and
4. A planned approach to mitigation measures emphasizing reversibility will be serve to reduce the loss of agricultural land.

Following assessment, with regards to potential vibration impacts resulting from construction activities, it was determined that:

1. None of the heritage resources where potential vibration impacts were identified are at risk of removal and will be retained intact;
2. Heritage resources where potential vibration impacts were identified are contained within a 50 metre assessment area; and
3. A preventive approach to mitigation measures using planning mechanisms will best serve to reduce the risk of indirect impacts.

6.2 REVERSIBLE ALTERATIONS

The Draft Decommissioning Plan Report (Dillon Consulting December 2014, in progress), describes the planned approach to decommissioning which is anticipated to take place at the close of the Project, currently estimated to be 2035. The report anticipates that the land will be restored to an agricultural use. It is anticipated that this will align with heritage attributes identified in relation to the vernacular rural landscape (CHR 8). Therefore, it is recommended that the Project adhere to the site restoration plans as discussed in the Decommissioning Plan Report when finalized.

6.3 PLANNING MECHANISMS

Components of four heritage resources and a single potential heritage resource were determined to be situated within 50 metres of the Project Location. In order to prevent negative indirect Project impacts related to construction vibrations, heritage resources positioned within the Project Location should be isolated from Project activities. It is recommended that site plan controls be put in place prior to construction to prevent potential indirect impacts. The site plan controls shall include fencing to indicate where Project activities are restricted as described below. These controls should be indicated on all construction mapping and communicated to the construction team leads.

Given the position of the heritage resources it is recommended that where construction activities may occur a 50 metre buffer zone be established around each heritage resource to indicate where all construction activities must be avoided including, but not limited to, ground disturbance and the movement of equipment and people to and from the site. If construction activities enter into the 50 metre buffer zone, all activities should cease immediately and a qualified building condition specialist should be retained to determine if any damage was incurred as a result of the construction activities. Only following approval from the building specialist, should construction activities resume at which point the 50 metre buffer should be re-established.

Where construction activities cannot be avoided within the 50 metre buffer zone, 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 (preconstruction survey). Construction within the 50 metre buffer zone should be monitored to confirm 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 heritage resources.

6.4 GENERAL

In order to understand the visual effects of the Project generally, MTCS should be notified when the Visual Impact Assessment is posted for public review.

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.

To assist in the retention of historic information, copies of this report should be deposited with a local repository of historic material. Therefore, it is recommended that this report be deposited in the local history collection at the following location: Southgate Library, 80 Proton Street North Dundalk, Ontario.

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 Section 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,

Joseph Muller, RPP/MCIP
Heritage Planner
416 314 7145
Joseph.Muller@Ontario.ca

cc. José De Armas, Manager, Project Development,
Samsung Renewable Energy Inc.

Agatha Garcia-Wright, Director
Environmental Approvals Branch, Ministry of the Environment and Climate Change (MOECC)

Sarah Paul, Director
Environmental Approvals Access and Service Integration Branch, MOECC

Paula Kulpa, Manager (A)
Culture Services Unit, Ministry of Tourism, Culture and Sport

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.