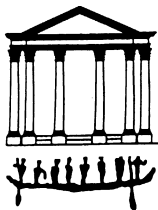


Review of Cameco 'Vision 2010' EA
Re:
the Cultural Heritage Resources of the Center Pier, Port Hope

Prepared by:



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Background

In April 2011 ***André Scheinman Heritage Preservation Consultant (ASHPC)*** was retained by the Pier Group to consider the matter of the buildings on the Center Pier of Port Hope Harbour in light of the Federal Environmental Assessment (EA) being undertaken by Cameco with regard to their Vision 2010 redevelopment proposal for the Port Hope conversion facility. The Cameco EA process led to the publication in December 2010 of a draft Environmental Impact Statement (EIS) and its distribution for stakeholder and public comment.

The Pier Group has long been concerned that the true cultural value of the buildings of the Center Pier has not been recognized by either the Municipality/Harbour Commission or the proponent thus making them vulnerable to outright demolition, dereliction through neglect and/or the creation of an adjacent environment incompatible with their survival and eventual possible renewal. Indeed it has been a stated intention of the Town for several years to have the buildings removed as a component of the plan to revitalize the waterfront.

It was out of this concern that The Pier Group initially formed and, though it contains within its own membership a number of highly respected professionals in the heritage preservation field, commissioned an independent objective heritage assessment and evaluation of the site by the western Ontario based consultant Christopher Andreae (Historica Research Limited), who has particular expertise and experience in dealing with industrial heritage. That report *Heritage Assessment of the Port Hope Centre Pier* (second edition June 2009) encompassed detailed research and analysis of the historical evolution of the Port Hope Harbour in general and the Centre Pier in particular. It examined the industrial history of the Center Pier largely focussing on the Standard Ideal Sanitary Company who initially developed the property just after the turn of the 20th century and continued to manufacture sanitary fixtures and associated plumbing supplies there until after WW II (as part of Crane Ltd. after 1930). Dr. Andreae's research confirmed that the surviving buildings derive from various key periods in the evolution of that company, once the largest employer in the town, with both Building #41 and Building #43 (existing Cameco numbering system) containing sections c.1910 (or perhaps even earlier).

This comprehensive research into the evolution of the site, the place of the surviving buildings within that evolution and analysis of their form and construction technology provided the basis for the evaluation of the cultural value of the structures and the site using the criteria laid out in Regulation 9/06 of the Ontario Heritage Act (2006). The result of the evaluation led to the determination that Buildings 41 and 43 merited

designation under Part IV of the Ontario Heritage Act. Dr. Andreae also found that the Centre Pier site warranted consideration as a cultural heritage landscape.

ASHPC, based in Kingston, with over 30 years professional experience in dealing with historic buildings, sites and cultural landscapes (see Curriculum Vita appended), was then retained to act as a second independent heritage expert to review the earlier assessment and evaluation of the Center Pier Cultural Resources as well as the treatment of these cultural resources within the Cameco EIS.

Review of Center Pier Cultural Resources within the EIS

The *CEAA Reference Guide on Physical and Cultural Heritage Resources* requires “that consideration must be given to cultural heritage resources in undertaking a federal EA. The EA Act specifically refers to “physical and cultural heritage” in the definition of “environmental effect”:

“any change that the project that the project may cause in the environment, including any effects of such change..., on physical and cultural heritage...”

The Reference Guide also states the following:

“It is important to note ...that not all valued cultural heritage resources have official designation status and therefore may not always be identified in government registries. They may not even be formally recognized or documented.”

This statement above is extremely important in the consideration of the cultural resources of the Centre Pier.

Furthermore the Reference Guide articulates three key principles which should be considered in undertaking an EA with **Principle 1** being “**Cultural Heritage Resources should be examined from a broad perspective.**” **Principle 3** restates that “**Many important heritage sites have not been identified or formally recognized.**”.... **Appropriate stakeholders, professional experts, the public and organizations dealing with cultural heritage matters are all important sources of information in identifying and evaluating these sites.”**

Through such statements the proponent is clearly directed to examine the physical and cultural resources within the area of potential impact, objectively identify those of cultural value (whether formally recognized at the time of the study or not) and take into account any sites so identified in the consideration of potential adverse affects and mitigation strategies.

Clearly the **Cameco Vision 2010 EA** has not fulfilled the requirement for responsible review of physical and cultural heritage resources in this regard. This is particularly troubling given that the fate of the cultural heritage resources of the Center Pier within

the proposed redevelopment plan is demolition, the ultimate negative impact as far as heritage structures are concerned.

The EIS clearly states the intention to demolish “old or underutilized buildings” as a basic component of Vision 2010 and the buildings of the Centre Pier (along with many on the main site) are further identified for demolition on Fig.3.2-1 and Table 3.4-1 of the document. The specific rationale for demolition of the Center Pier Buildings is provided in Section 3.4 “Cameco’s existing agreement with the Harbour Commission requires that these buildings (40, 41, 42 and 43) be demolished prior to the termination of the lease unless directed otherwise.”

Within Section 5.11.1.3 of the EIS, the Description of the Existing Environment of the Site Study Area, the Heritage Assessment of the Centre Pier by Historica Research is acknowledged and the conclusion, within that study, that several of the buildings and possibly the cultural heritage landscape, should be understood as bona fide cultural heritage resources, is stated. However there is no further comment on the validity of these conclusions, reference to follow-up investigation/research nor any further or alternative evaluation provided.

Somehow though, by section 6.12, it has been determined that **“there is very low potential for...heritage or cultural resources to be at risk...”** and in Table 6.3-1: ‘Likely Interactions between the Project and Environmental Components’ no ‘interaction’ between building dismantlement and heritage resources is acknowledged. This disconnect, without any rationalization, in the face of an assessment to the contrary by an acknowledged expert, cannot be considered acceptable within the EA process.

The EA process, undertaken responsibly and according to the approach mandated in the CEAA Reference Guide quoted above, given that the buildings of the Center Pier had been identified as being of cultural value by both local heritage professionals and an ‘outside expert’, should have involved a professional expert(s) in the area of cultural resources with experience in dealing with industrial heritage undertaking first hand review of the cultural resources of the Center Pier, detailed review of the existing Heritage Assessment, an objective evaluation using established criteria and finally an opinion regarding the cultural value of the resources under review. This would then have formed the rationale for the approach to these resources within the EIS.

In this case the proper EA process has been clearly truncated in deference to the Owner’s (PHHC) wishes to demolish these structures. The EA process however is intended to be an objective assessment of resources and values beyond the interests/intentions of the proponent or any particular stakeholder no matter how important. Thus this EIS, as regards Cultural Resources, must be considered incomplete and flawed.

Summary Review of *Heritage Assessment of the Center Pier (Historica Research, 2009)*

While other books, publications and reports have dealt with the history and evolution of the Port Hope Harbour, the *Heritage Assessment of the Center Pier* (hereafter HACP) is the only study to date which has examined the industries of the Center Pier, leading up to the purchase of the site by Eldorado Nuclear. It details the major ‘players’, the evolution of the buildings and manufacturing processes and the affect of the industry on the Town of Port Hope both economically and in terms of associative infrastructure. The HACP also analyses the form and structure of each of the buildings as well as their function(s) over time within the Sanitary factory complex. The buildings are further examined within the context of factory/warehouse building norms of the late 19th and first half of the 20th century.

It is this level of detailed research and investigation which underpins the evaluation of the buildings and associated landscape undertaken using the criteria, which, since being laid out by the Provincial government in 2006, have become the standard for such evaluations of local cultural heritage resources in Ontario.

In examining the case made within that assessment there would appear to be little to argue against:

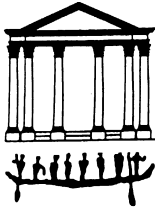
- The importance of the Harbour and the Center Pier to the development of Port Hope;
- The importance of Standard Ideal Sanitary Company and its successor firms to the harbour and the economy of Port Hope;
- That the complex of buildings remaining on the Center Pier, ranging from turn of the 20th century until c.1960, along with such features as the remaining track of the former spur line, remain an evocative representation of the history of the manufacturing of sanitary fixtures at the site and the processes associated with their manufacture;
- That portions of Building #41 and #43 are good examples of the survival of heavy timber (slow burning) mill construction into the 20th century within a Victorian/Edwardian brick envelope featuring large arched openings within niches between brick pilasters;
- That the rhythm created by the brick pilasters and the fenestration, as well as features such as the large monitor at Building #43, are noteworthy heritage attributes and representative of 19th and early 20th century industrial structures;
- That surviving details such as the painted sign “Port Hope Sanitary Manufacturing Company Limited” are important features in understanding the history of the site.

Conclusions

Considering the above points it seems clear that the site, particularly Buildings #41 and #43, represent an important aspect of the history of the Town of Port Hope and as such, certainly worthy of designation under the Ontario Heritage Act. That the buildings are instead being considered for demolition can only be due to the negative perception of their industrial past and perhaps mainly, the recent past, i.e., associated with Cameco waste. However over the past decade many similar waterfront industrial sites have been rehabilitated to become vibrant cultural centers for their respective communities – such as the Distillery District in Toronto and the Isabel Bader Center for the Arts/Tett Community Arts Center in Kingston.

In any case there can be little question of the cultural value of the site and this should have dictated an appropriate response within the EIS concerning analysis of impacts, mitigation strategies etc. Regardless of any prior agreement with the Port Hope Harbour Commission, within the Federal EA process Cameco is bound to review the cultural and physical resources of the Centre Pier for their inherent cultural value and it is that upon which their treatment as described within the EIS should be based.

In closing it should be here noted that Cameco has made it clear that the demolition of the Center Pier structures is not a requirement of their future plans and as they state in Appendix 'L' of the document an alternative course would be the complete decontamination of the buildings “with the resulting outcome of clean buildings that can be restored or used for other purposes.” This would be an approach in keeping with the heritage importance of the Center Pier site and its potential for being incorporated into innovative planning for the Port Hope waterfront.



André Scheinman Heritage Preservation Consultant

André Scheinman has, for over thirty years, specialized in the planning for, and preservation of historic sites, structures and cultural landscapes. *André* is a founding member of the *Canadian Association of Heritage Preservation Consultants (now CAHP)*, and is a thirty year member of both the *Association for Preservation Technology (APT)* and the *International Committee on Monuments and Sites (ICOMOS)*. He was honoured by *ICOMOS* in 1998 for his contribution to international conservation in reference to his involvement with the international delegation (1988) to the then Soviet Union toward the conservation of the World Heritage Site at Kisi.

Prior to establishing his own firm (1980 – 1988) André was

- consultant to the Ontario Heritage Foundation (OHF), responsible for architectural/historical/technical research, condition assessments and developing construction documents for the restoration of such significant OHF properties as the Bethune/Thompson House, Glengarry (National Historic Site (NHS)).
- consultant to the (then) Ontario Ministry of Citizenship and Culture, responsible for the development, implementation and technical support of the Building Rehabilitation and Improvement Campaign (BRIC), grant programs to assist the owners of designated heritage buildings.
- manager of heritage preservation projects for Quadrangle Architects, Toronto with prime responsibility for such projects as the Fort York Architecture and Engineering Study and the restoration of the Queen's Wharf Lighthouse and the Bovaird House, Brampton

Since establishing *André Scheinman Heritage Preservation Consultant* in Kingston (1988) André has undertaken a wide variety of heritage projects for both private and public sector clients including many national historic sites (NHS). Recent and/or current projects include:

- Queen's University Performing Arts Centre (QUPAC) – HIS/Technical Conservation Consultant
- Queen's University Medical School - HIS/Technical Conservation Consultant
- Old Sydenham Ward Heritage Conservation District Study
- David Dunlap Memorial Observatory, Cultural Heritage Landscape Assessment
- Pembroke Courthouse (AIA Award for Judicial Facilities 2007, OAA Award 2009)
- Heritage Assessment of Eastern Ontario Courthouses, ORC
- East Block, Parliament Hill, Ottawa – Conservation and Envelope Study
- Automotive Building H.I.S., CNE, Toronto
- Heritage/technical conservation consultant, Ft. Champlain Recapitalization Project, RMC
- Heritage/technical conservation consultant, Ft. Haldimand Recapitalization Project, RMC
- Town of Caledon Cultural Heritage Landscape Inventory, Phase 1 and 2
- Heritage significance assessment of 25 Seaton area buildings for the Province of Ontario;
- Rockside Cultural Heritage Landscape Study, Town of Caledon;
- Exterior Restoration of Kingston City Hall

Heritage Assessments/Planning

- City of Kingston Building Conservation Master Plan (17 Buildings)
- Rouge Valley Park
- Seaton Lands, North Pickering
- Uxbridge Cultural Strategic Plan
- Twenty Valley Cultural Tourism Study
- Frontenac Park Assessment of Historic Zones
- Town of Caledon Cultural Heritage Landscapes – Identification Criteria and Inventory
- Town of Caledon Rockside Cultural Heritage Landscape Assessment
- Region of Waterloo Cultural Heritage Landscapes Identification Criteria /Preliminary Inventory
- Balls Falls Heritage Master Plan
- Heritage Significance Study (Class EA), former KPH (2 structures)
- Review of Barriefield Heritage Conservation District Plan
- Sir James Whitney School for the Deaf, Belleville
- Heritage Study of 38 structures at Royal Military College (RMC), Fort Frontenac and CFB Kingston for Defence Construction Canada

Heritage Building Restoration/ Individual Building Studies

- Heritage/technical conservation consultant, Fort Henry (NHS) Advanced Battery Restoration
- Heritage/technical conservation consultant Pembroke Court House Renovation and Additions
- Heritage assessment study of 17 buildings for the City of Kingston
- St. George's Cathedral, Kingston*
- Old Stone Mill (NHS) c.1810, Delta
- The Halfway House c.1810, Hamilton Township
- Hotel Quinte c.1835, Picton
- Frontenac County Courthouse
- Pan Chancho, Kingston *
- The former Whig Standard Building, Kingston*
- The Poplars, Cobourg
- Otterburn c.1840, Kingston*
- Gildersleeve House c.1820, Kingston*
- 285-291 Jarvis Street c.1885, Toronto
- 18 Barrie Street c.1830, Queen's University, Kingston*
- Cole Shoal's Lighthouse, Brockville
- The Elizabeth Cottage (NHS) c.1840, Kingston*
- White Otter Castle c.1912, White Otter Lake
- 78 Brock Street c.1860, Kingston*
- Glanmore (NHS) c.1883, Belleville
- Dundurn Battery (NHS) c.1830, Hamilton
- The Enoch Turner Schoolhouse c.1848, Toronto
- Kingston Hall, Queen's University, Kingston
- St. James' Chapel c.1880, Kingston
- St. Mary's Cathedral c.1840, 1880, Kingston*
- Sydenham Street United Church, c.1880, Kingston*
- St. James' Anglican Church c.1860, Kingston* *FHF Award

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