

August 30, 2021

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Copied to:

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Dear Minister Piccini,

**Re: MECP public statement about Hyatt and MacDonald Houses at Sandbanks Provincial Park**

On August 27, I watched CKWS Kingston Global News and heard the MECP statement in response to the question asking whether your Ministry intends to demolish the heritage houses at the Park.

*Frankly* – It is not clear from the MECP reply whether this is a general restatement of the Ministry's long-standing position, pending a specific response to the request of the Mayor and the community group (Save Heritage Sandbanks Homes) that you pause demolition, or whether the statement constitutes your Ministry's final position.

In either circumstance, I must correct and refute the misunderstandings in the statement in a direct manner to you now, in the hope that you are still considering the Municipality's and community group's careful and reasoned arguments against demolition.

I have personal and professional knowledge about the matter because Robin Reilly allowed me to visit the houses on February 28, 2020; I am a former partner of Philip Evans in ERA Architects Inc. (but now retired and sole practitioner of Edwin Rowse Architecture Inc.); and I have the Record of Decision, provided to me by your Ministry.

The first part of the MECP statement reads:

*"Proposals by local individuals with an interest in Gray House and MacDonald House were carefully reviewed and considered by the ministry."*

This refers to the proposal made by Mr Evans on October 7, 2020, in which he requested a 3-month pause in the Environmental Registry process in order to undertake a due diligence assessment of the houses, together with three interested investors. This was not a development proposal *per se*, but more of an initial offer from Mr Evans that if agreed to, would have led to a full technical analysis, with a project cost estimate, and a financially viable proposal to repurpose the two houses.

Mr Evans was never allowed to produce a development proposal for officials to “carefully review and consider.” He had a virtual meeting on October 29 with officials from Ontario Parks (Kendra Couling, Erika Barkley, Stefan Petit). At the virtual meeting, officials did not convey to Mr Evans that any proposal would have to be part of the government’s procurement process and entail competitive bids. After the virtual meeting and for the next 3 months, there was no further engagement by the officials to enable Mr Evans’ due diligence activities, negotiate aspects of the proposal, or discuss the procurement process; he was never provided access to the buildings. On February 4, he received a letter from Ontario Parks rejecting his offer, to which he responded immediately (February 7), with specific information to address Ontario Parks’ concerns about building condition and health & safety risk. The officials never responded.

On the very same day as his rejection letter (February 4), Ontario Parks Director (Policy/Program) Jason Travers signed off on the Decision/Approval note seeking MECP Deputy approval to release the amended Management Plan allowing demolition, with a required decision date of February 17. Officials were anxious to demolish before April 1, when the demolition window closed to protect birds and bats.

MECP’s statement is not only misleading to the public, but it hides the fact that Ontario Parks never intended to pursue an alternative to demolition when the opportunity arose and as required by heritage policy.

The second part of the statement reads:

*“Detailed heritage assessments recommend tearing down the buildings as soon as possible in the interest of public health and safety. They are no longer safe to maintain or access.”*

I commented on this wrong understanding of the condition of the buildings in my two responses to the Environmental Registry (January 20 and March 13, 2020, attached). The second submission followed my inspection of the houses during a site visit on February 28.

The MECP statement refers to the Heritage Impact Assessments for the two houses prepared by Christienne Uchiyama of Letourneau Heritage Consulting and it repeats her unsupportable findings and recommendations about building condition. This consultant, the only one engaged by Ontario Parks to study the buildings, is expert in cultural heritage planning, but has no expertise to comment on the structural and fabric condition of heritage buildings or to make recommendations based on an analysis of that information.

As a result of hiring an unqualified consultant to assess building condition (contrary to the *Standards and Guidelines* for the care of provincial heritage buildings, which requires a heritage architect or engineer for such studies), the consultant’s justification for demolition is based on superficial (in the sense of being on the surface) evidence included in the final Heritage Impact Statement, such as these examples:

1. **Flaking paint and cupped floorboards** (on the second floor of the MacDonald House): The implication is that this shows serious water damage, and hence decay. Figure 12 is captioned “Example of water damage, second floor west wing, along walls and warped and rotting floors (CU 2019)”. The image shows cupped boards in the MacDonald House. I walked over these floorboards with no cause for concern. In reality, the damage observed is limited to the floorboards. All interior

lath and plaster has been previously removed in the house and the supporting wood joists are visible and are neither warped nor rotting. The cupped floorboards have no structural significance whatsoever, and most likely are the result of a build-up of interior humidity because no provision was made for ventilation in Ontario Parks' inadequate mothballing of the buildings.

The interior wood framed structure of the MacDonald House is entirely open for inspection and shows no general signs of decay, other deterioration or "warping" due to structural stress.

2. **Graffiti on the walls and animal faeces** (in both houses): Again these implied signs of deterioration are minor, limited in extent and indicate infrequent entry of humans or animals. I have seen much worse in heritage buildings undergoing renovation.
3. **"Visible portions of the rubblestone foundation and exposed brick and mortar have continued to crack, spall and otherwise deteriorate and separate (Figure 17 and Figure 18)"** (in the MacDonald House): Figure 17 shows minor masonry spalling and a few small stones dislodged in the exterior face of the foundation where a previous addition has been removed. The stones may have been dislodged by the demolition. No masonry cracks are visible. Figure 18 shows movement of a light wood-framed enclosure to the exterior basement access which has no structural significance.

My inspection on the interior of the foundation walls revealed an exemplary quality of masonry construction in a generally sound and stable condition.

It is on the basis of this evidence of implied serious deterioration that the whole case for demolition has been built by the consultant and Ontario Parks. Undoubtedly, the exteriors of the houses are dilapidated, and in the case of the Hyatt House, an area of roof has failed leading to serious wetting of the floor structure and extensive decay in one limited area. For heritage architects and engineers familiar day to day with similar heritage buildings, such issues are routine and readily repairable.

As regards public health and safety, the relevant issues for maintenance inspections or unauthorized intruders would be the risks of collapsing building fabric, airborne mould spores as a result of serious mould growth, and airborne fungus related to large deposits of bat faeces.

During my inspection of both houses, I observed no structural fabric at risk, such as failing roof rafters or lintels, brick walls and chimney stacks that could collapse or shed bricks without warning, or floors and floorboards that were wet and decayed and at risk of collapsing under a human footfall.

Winter in unheated buildings is not a time when mould is active and spores are present. There was limited evidence of mould growth beneath local leaks, but no telltale mould staining of structural wood framing. Mould on floorboards can be treated or the floorboards removed locally without impacting the structural integrity of the building. The buildings were generally dry, which discourages mould growth. Similarly, cold weather suppresses the smell of bat faeces, but I saw no signs of faeces on the floors or in the attics.

Building professionals and contractors are well experienced in taking appropriate safety precautions and proceeding with caution when inspecting an old building; and they carry insurance to indemnify an owner, so that authorized access for maintenance work can definitely be carried out. As regards unauthorized access, the exterior fabric of both buildings is adequately sound, so that window and door openings can be secured with stout plywood closures to keep out intruders (The occasional person who

may breach the plywood is no reason to demolish a building). The one hole in the roof of the Hyatt house can be easily closed with metal sheet.

### **Conclusion**

**Subject always to further inspection and detailed structural analysis, my long experience of heritage buildings tells me that it is technically feasible to restore these two significant heritage houses. Financial viability remains to be tested by a detailed study.**

They present opportunities to interpret the fascinating history of this provincially significant early vacation area as the last two surviving examples of historic lodges and to provide new and different attractions to today's Park visitors.

I look forward to hearing from your Ministry that you have taken positive steps towards ensuring a future for the Hyatt and MacDonald houses. Their adaptive reuse would benefit both the local economy and Sandbanks Provincial Park and preserve a precious part of Prince Edward County's cultural heritage.

Sincerely,

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Amending the Sandbanks Provincial Park Management Plan to enable the demolition of two buildings  
ERO number: 019-0977

### **Comments from Edwin Rowse**

I am a founding partner of ERA Architects in Toronto, a 100-person practice specializing in heritage architecture and planning. I am recently retired from the firm and in the process of setting up a new separate architectural practice, to be mostly focused on the heritage architecture of Prince Edward County. I have 45 years of experience in the heritage architectural field, am a long-time member of the Canadian Association of Heritage Professionals, and in 2018 I received a Lifetime Achievement Award from the Architectural Conservancy of Ontario.

I own a farm near Sandbanks Provincial Park, which is designated as a cultural heritage landscape under the *Ontario Heritage Act* and which has an 1860 farmhouse that I restored after it had sat vacant for 13 years under different ownership.

I have reviewed the 2017 Cultural Heritage Evaluation Reports (CHERs) for the Hyatt and MacDonald houses and the 2019 Heritage Impact Assessments (HIAs) prepared for the same buildings, all by Letourneau Heritage Consultants (LHC) on behalf of Ontario Parks (shared with me by a member of the Prince Edward Heritage Advisory Committee). Each HIA contains the report for that particular building prepared by Bradley Engineering in 2012, and I have given special attention to these building condition audits. In my review of the 1993 Management Plan, I noted the commitment to preserve these and other buildings within the Park's historical zone.

The CHERs and HIAs produced by LHC prompt concerns about issues related to lack of action on the commitment in the 1993 Management Plan, the lack of public consultation for these documents, shortcomings in identifying the heritage value of the buildings and in understanding their significance within the context of the special setting of Sandbanks Provincial Park. I understand that the submission by the Prince Edward Heritage Advisory Committee (PEHAC) addresses these issues.

My submission will focus on LHC's assessment of the condition of the heritage architectural fabric and how the consultants evaluate the impact on its significance in reaching their conclusion to recommend demolition.

In preparing my comments, I have relied on descriptions and photographs in the CHERs and HIAs, as I have not had access to the Hyatt and MacDonald houses

### **Concerns with methodology**

My fundamental concern is with the methodology LHC used to assess the condition of the heritage building fabric of the two houses, as expressed in the consultant's analysis in the HIAs. This underdeveloped methodology, not fully supported by evidence, which I describe below, then led to the recommendation to demolish both buildings.

LHC's observations are generally based on Bradley Engineering's 2012 reports, but without investigating more deeply and arriving at a different conclusion (demolition). Bradley Engineering stressed that its comments were based on a visual inspection alone, without any detailed structural analysis. I find both Bradley reports to be very reasonable, practical and careful in their conclusions, some of which were

clearly preliminary pending further investigation. Seven years later and stating clearly that its access to the buildings was limited by health and safety concerns, LHC has made architectural assumptions for the two buildings, involving structural judgment, that the consultant is clearly not qualified to make, and given these assumptions apparent authority by listing a series of relatively minor issues noted in the Bradley reports, as if these collectively added up to determining a basis for demolition.

Not all the issues raised by LHC could be analyzed because for some issues there was insufficient evidence provided even to make effective and useful comment. Thus, in the tables that follow for each building I have presented selected issues to illustrate that the case for demolition has clearly not been made.

**1 (a) Hyatt (Gray) House**

**Bradley Engineer’s comment relied on by LHC:**

<b>Quotations from Bradley Engineer report</b>	<b>Edwin Rowse response</b>
In my opinion the west wing will have to be demolished in its entirety. This opinion is based on the observed poor condition of all aspects of the structure. The floor framing is damaged, and it is likely that on closer inspection of the wood framing there will be significant rot found. The presence of other environmental contaminants also may not be able to be properly cleaned	These are sound observations of deterioration. However given that the west wing has not collapsed and the Engineer did not structurally investigate the framing members, a current structural investigation is merited.
The roof framing is significantly undersized and would need to be rebuilt	Most 19 <sup>th</sup> century framing is undersized by today’s standards. This is because the consistent quality of virgin wood could be relied upon, a quality that modern fast-grown wood does not possess. There is no apparent bending in the roof structures in the photos, which suggests that the roof can take traditional snow loads. It may be possible to supplement the existing structure, rather than incur the cost of rebuilding the entire roof.
The tops of the brick masonry walls have been open to the weather and are anticipated to be deteriorated.	The extent of openness to the weather is not made clear.
With respect to retention of the east and centre wings, the investigation concluded that additional investigation would be required to determine the architectural direction and financial investment required for their potential rehabilitation. The investigation recommended that, at the time, the following further investigations would be required to determine the potential for retention of the east and centre sections:	Additional investigation is sound advice and still applies now.
Cleaning of the building. An environmental consultant should be retained to recommend an appropriate level of testing and cleaning protocol to ensure the building is free from mould and other health hazards.	This is an important issue and such testing is needed before deciding whether rehabilitation is feasible.
The selective removal of finishes to expose the brick and wood.	This still needs to be done, as part of a thorough and comprehensive examination and assessment
An inspection of the brick and wood framing to determine the percentage of these elements that would	Ditto

have to be replaced or repaired.	
<p>In addition, the following work was recommended as required in the event of restoration:</p> <ul style="list-style-type: none"> <li>• Reconstruction of portions of the stone masonry foundations.</li> <li>• Reconstruction of all exterior finishes, windows and doors.</li> <li>• Reconstruction or removal of chimneys.</li> <li>• Removal and reconstruction of the covered entrance to the basement.</li> <li>• Construction of additional roof framing for the east wing roof.</li> <li>• The front entrance porch should be removed [this was subsequently done].</li> </ul> <p>Remove overgrown trees, shrubs, and vegetation from around perimeter of building.</p> <ul style="list-style-type: none"> <li>• Protect foundations from excess water runoff by providing rainwater management from roof surfaces and direct water away from the building foundations.</li> </ul>	<p>This advice is sound but still very general and would need further detailed site examination and specification. These practical rehabilitation steps outlined by Bradley Engineering do not indicate that the Engineer believes that demolition is the logical conclusion.</p>

### 1 (b) Hyatt (Gray) House

#### LHC's comments in the HIA relying on information taken from the Engineer's report:

Quotations from LHC's comments in HIA	Edwin Rowse response
The interior of the building is, generally, in poor condition as a result of vandalism, animal droppings, and water infiltration.	The vandalism, droppings and water infiltration appear limited and localized in the <u>photographs and none indicate serious knock-on fabric deterioration</u>
The west wing is the most deteriorated of the three sections; there is currently a hole in the roof and the floor and structural supports may be compromised.	This hole could be readily repaired temporarily with sheet metal and the surrounding wood fabric does not seem heavily impacted. "Structural supports <u>may be compromised</u> " indicates the need for further investigation.
In general, excess moisture has led to continued peeling, warping, bowing and loss of finishes throughout	Bowing and warping are not evident in Figs 3 and 4. The peeling and loss of finishes is likely the result of sealing the windows up without provision for ventilation, which has resulted in very high interior relative humidity, and not the result of running water. Finishes are easily replaced.
The failed west wing first storey floor and framing has continued to deteriorate beyond the poor conditions observed in 2012 and 2017. Almost the entirety of the floor has now failed and timber beams have been added to support the second storey, despite the failure of the first storey timber beams and flooring (Figure 5).	Evidence of this continued deterioration is not given. The temporary support appears to be effective, since there is no signs of distortion of walls or floors
A hole in the roof is clearly visible from the first floor (Figure 6).	The hole is near the eaves and can be temporarily closed with sheet metal
Flooring, throughout (not limited to the west wing), shows signs of excessive moisture and rot when stepped on. Some areas of the structure were not accessed due to safety concerns.	This is not illustrated. There is no back up for the assertion.

Despite efforts to secure the structure, the incidents of pest infestation and droppings has continued (Figure 7) as has unauthorised entry and instances of vandalism (Figure 8 and Figure 9).	As stated above the evidence of these problems appears localized and limited and does not present evidence of continuing issues.
In addition to previously identified concerns related to the foundations and masonry; the exterior plaster cladding was observed to be failing during the 2019 site investigations (Figure 10).	Fig. 10 shows that the exterior stucco (not plaster) has spalled. The damage to the brick work behind is limited and repairable, and more importantly answers Bradley Engineering's concern that it was not possible to determine at that stage whether the stucco was spalling or the brick veneer was bowing. <u>The brick bond indicates clearly that the walls are at least double wythe and not veneer and bowing is highly unlikely.</u>

## 2 (a) MacDonald House

### Bradley Engineer's comment relied on by LHC:

Quotations from Bradley Engineer report	Edwin Rowse response
In my opinion, the structural components of the main sections of the building (East Structure and West Structure), which were the focus of this report, have useful life remaining. Therefore, the structural rehabilitation component of the entire project will not be the critical factor when deciding on proceeding with the rehabilitation.	This assessment was made 7 years ago, but affirms the soundness of the structure. These comments do not support a conclusion for demolition, but given that the comments are 7 years old, a new structural assessment is needed before the future of the building is decided.
An environmental consultant should be retained to recommend an appropriate level of testing and cleaning protocol to ensure the building is free from mould and other health hazards.	This is very sound advice. The ventilation suggested above and in Bradley's 2012 report would likely solve this issue.
Proper ventilation and control of moisture in the basement will minimize the amount of water that moves between the mortar joints, which results in deterioration of the joints and a loss of integrity of the stone masonry foundation walls.	Ditto
If lathe is being removed from the interior face of the wood studs framing the wall, AND no board sheathing is found on the outside face of the studs, the walls must be adequately braced and some other form of permanent bracing must be reestablished [sic] (i.e., plywood).	This is sound advice. Adding bracing if there is no sheathing would be done in proper sequence to safeguard the stability of the walls. There would be no risk to the structural stability of the building.
The stucco finish may have been original or added later. Regardless, the stucco is currently providing the barrier to weather and must be cleaned, repaired, or selectively removed and replaced, to maintain its integrity. Diligent effort must be made to select appropriate material and methods for cleaning and repair of stucco.	This is sound advice given that the reason for adding the stucco is unknown. The exposed brick appears in sound condition.
Remove overgrown trees, shrubs, and vegetation from around perimeter of building.	Removal is part of ongoing preventive maintenance for an older building.
Protect foundations from excess water runoff by improving rainwater management from roof surfaces, direct water well away from the building foundations,	Ditto, and as a relatively cheap and easy intervention to protect the foundation stonework from water



and maintain these systems. Water infiltration through masonry joints is extremely detrimental to the overall integrity of stone masonry foundation walls.	
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## 2 (b) MacDonald House

### LHC's comments in the HIA relying on information taken from the Engineer's report:

Quotations from LHC's comments in HIA	Edwin Rowse response
The rear addition along the east wing has been removed (Figure 5 and Figure 6). The removal of this addition has resulted in the exposure of the rear wall of the west wing (Figure 7) - constructed as an exterior wall, but in a questionable state of repair - and an open gap along the second floor joists (Figure 8).	The rear wall shown exposed in Fig. 7 was constructed as an exterior wall and most of its shiplap siding, which sheds water, appears to be intact. The roof eaves that overhang above will also protect the wall. Minor temporary repairs may be needed to make the wall watertight, but it is not in a "questionable" state of repair. The open gap is where the former lean-to rear addition (Figs 5 and 6) connected to the west wing. The boards here have been disturbed, allowing in the light. This is right under the eaves overhang, so partly protected. The gap could be easily closed by temporary metal or wood boards.
Deterioration of the envelope has resulted in a number of concerns, including evidence of wildlife intrusion and evidence of mould, fungi, mildew and visible rot and warping caused by excess moisture from water infiltration (see Figure 8 to Figure 16). On the day of the site visit, portions of the floor felt spongy throughout.	The wildlife intrusion indicated by animal droppings in Fig. 9 is limited. The extent of dampness and mould shown in Fig. 10 is no great threat. The floor damage illustrated in Fig. 12 shows warped t and g floorboards; however, there is no sign that the integrity of the subfloor is compromised. The hole in the roof in Fig. 13, which caused the water infiltration, is small and can be temporarily closed with sheet metal or roll roofing. The building fabric around the hole shows little sign of damage.
Visible portions of the rubblestone foundation and exposed brick and mortar have continued to crack, spall and otherwise deteriorate and separate (Figure 17 and Figure 18).	There is one crack shown in Fig. 17 in the foundation wall, but there is no sign of movement or settlement existing or continuing. Otherwise, the stone foundations are in good condition, needing limited repair, and the newly exposed brickwork is not spalled or otherwise deteriorated. No evidence is provided to indicate continued opening up of the crack to the lean-to entrance shown in Fig. 18, and the existing movement in no way threatens the structural integrity of that small addition.

## Conclusion

From this tabulated analysis, it appears that the only structure whose structural and fabric integrity is in some doubt is the west wing of the Hyatt (Gray) House; and the other issues put forward by LHC as justification for demolition are all relatively minor from the evidence presented and most issues could be temporarily resolved by a small work crew. For example: (i) water penetration could be halted by closing holes in the roof with sheet metal and closing gaps under the eaves with sheet metal or wood boards; (ii) access by small animals could be prevented by closing up gaps; and (iii) vandalism and any other unauthorized access could be discouraged by erecting a perimeter fence around each building.

Such small repairs to the fabric of the buildings would be a first step in creating an opportunity for a careful comprehensive review of the two buildings. A specialist heritage architect, working with a structural engineer with heritage knowledge, would need to be engaged to undertake a heritage condition assessment and prepare information for a feasibility study of how the buildings could be rehabilitated, with options for their future use to meet the commitment made in the 1993 Management Plan.

The intent of such a thorough and comprehensive examination and analysis of the buildings would be to understand their structural systems and construction in detail so that good decisions can be made when considering the rehabilitation of the buildings and each conservation action can be tracked and understood in all its ramifications. A further benefit of detailed analysis is that, although the buildings are constructed of “common” materials (so described by LHC), the eye of an experienced heritage architect will often note subtle vernacular construction and finishing details, easily missed, that would add to the buildings’ established heritage value and interest.

These findings, with photographs and construction sketches, and the resulting analysis, would need to be consolidated into a report that includes a schedule of prioritized repairs, from which a cost estimate with options for the work could be prepared. All the above information would provide the basis for feasibility options, even before necessary upgrades for a particular use were identified.

*In my professional opinion, the HIAs by LHC have an underdeveloped methodology and insufficient information and analysis to justify amending the Management Plan to enable demolition of the Hyatt House and MacDonald House.*

*I strongly support retention, rehabilitation, and repurposing of both buildings.*

Respectfully submitted by Edwin Rowse

## **Further comments from Edwin Rowse on the Sandbanks Provincial Park Management Plan application to enable the demolition of two buildings**

ERO number: 019-0977

These comments are made following my site inspection of the Hyatt and MacDonald Houses in Sandbanks Provincial Park on February 28, 2020, facilitated by Robin Reilly and his Parks staff person. The comments are intended as information to support the as-yet-unfulfilled and required public consultation with the Prince Edward Heritage Advisory Committee regarding amending the Sandbanks Provincial Park Management Plan to enable the demolition of these two buildings. The public consultation was to be taken into consideration in the final Heritage Impact Assessment for each building, which would guide the decision-making process. The public consultation is recommended in Section 7, Summary of Community Engagement, in each HIA as follows:

“In order to satisfy the requirements of Provision F4 of the S&Gs, it is recommended that a copy of this report be provided to the municipality and the Friends of Sandbanks for their review and comment on whether there is additional information or ongoing initiatives that should be taken into consideration in this HIA or any future commemorative initiatives.”

Despite undertaking the inspection of the houses in high winds and white-out blizzard conditions, I gained a far more detailed understanding of the configuration and condition of the two houses than was possible by reference to the HIAs and CHERs prepared for them. Apart from the basement of the Hyatt House, blocked by a partially collapsed basement stair, which made ladder access impossible, the houses were fully accessible including their attics.

### **Site Comments**

The interior plaster finishes on walls and ceilings have been completely removed, as requested by the structural engineer in 2012 to permit a full structural assessment. While removing all the plaster is inappropriate from a heritage value point of view, the exposure of the structural wood framing allows certainty about its condition and structural soundness. The removal of plaster also allows air to circulate freely through the building fabric and, as there are sufficient gaps around un-boarded windows to allow ventilation, interior conditions do not appear conducive to mould growth. Keeping in mind the winter conditions, nonetheless, there were no visible signs of mould on surfaces and even the basement of the MacDonald House (which was accessible) was dry and free of mould smells.

My overall assessment is that, despite the 7 years since the Bradley engineering report and in contradiction to the comments in the HIAs that conditions have significantly worsened, the condition of the fabric in the two buildings is remarkably sound considering the lack of maintenance, with minor local exceptions, and still as good, and in some instances better, than Bradley described. Even the west wing of the Hyatt House, which Bradley recommended demolishing, is on careful examination in readily repairable condition and it would be feasible to bring it back into use. Here the double-wythe brickwork walls are well bonded and show no signs of structural settlement (the west wing's exterior stucco shows no sign of stress cracks); there is no dampness in the core of the brickwork, or serious deterioration of the pointing which would indicate frequent water migration through the bricks. Even areas of the top of the wall on the south side, directly exposed to the weather where the roof has been stripped back, would need limited rebuilding to make them sound.

The schedules of commentary included in my original ERO submission are repeated here below, with additional comments in **red text** reporting in more detail the **observations of my site visit**.

### **Concerns with methodology**

My site inspection and assessment confirm my concern that the methodology used to assess the condition of the heritage building fabric of the two houses, as expressed in the heritage planner's analysis in the HIAs, was underdeveloped and not supported by the site evidence.

The heritage planner's inspection did not look at the essential condition of the building elements that constitute the health of a building, such as the soundness and lack of bowing or distortion in floor, wall and roof structures, stability or settlement of the masonry walls, and degree of dampness and whether long-standing. Instead her inspection focused on superficial factors such as animal droppings and peeling paint which upon my site visit proved of no consequence. I reviewed each issue raised by the heritage planner in the HIAs which led to the recommendation to demolish, and – frankly – none/few of them had any validity, as I detail in the schedules below.

Even the heritage planner's background comments were aimed at damning the buildings. For instance, in practice a half-face mask with appropriate cartridge filters provides full protection for mould in any season; yet, the heritage planner noted that health-and-safety concerns limited the scope and range of her inspection. There was no health-and-safety concern from mould visible to me in the form of stains or deposits as I toured every space in each house with Parks Staff. The only safety concern that they pointed out to me during our tour was the decayed floor in the summer kitchen of the Hyatt House (west most room in the west wing; possibly the summer kitchen).

As for elements of the exterior fabric represented by the heritage planner as a danger of falling on the general public, none were visibly loose even in the 80 km/hour gale blowing during my winter site visit. My visual inspection confirms my suspicion that the heritage planner simply assumed that 7 years had resulted in significant change in condition, without closely observing and/or not understand what she was looking at. As a heritage planner without architectural or engineering expertise, she was unqualified to assess the current condition of the issues identified by Bradley, and hence to draw any conclusions about the overall structural stability or condition of the buildings. In short, it is now clear that the heritage planner provided no credible basis for her recommendation to demolish.

### **Other cultural heritage considerations**

My site visit allowed me to gain a better understanding of the tapestry of public and private lands, and of built cultural heritage and cultural heritage landscapes, that make up Sandbanks Provincial Park. In a telephone call before my visit, Mr Reilly briefed me on Parks' current approach to the 1993 Management Plan. He described Parks' vision and interest in returning the park to a "natural environment," which Parks staff take as their informal mandate, but including limited historical interpretation of some of the ruined buildings. He emphasized that most of the park is being naturalized and is not visited by the public.

In this telephone discussion of the natural environment policy for Sandbanks, prior to the site visit, Mr Reilly agreed that the policy reflected a purist approach to nature, which he justified on the basis that the large northern provincial parks, such as Quetico and Algonquin, were not accessible to the majority of Ontarians. He felt that there was a need for southern parks of that type that would allow more of the

population to experience the natural environment. I stressed that since 1993 ideas of cultural heritage landscape had developed and matured, and now reflected a general intent to relax firm boundaries between the natural and the cultural. It meant a site did not need to be identified as exclusively one or the other, that the two could live side by side, so that all rich elements of our history and cultural evolution could survive as part of the site memory.

Such a purist natural environment approach is not appropriate in my understanding in the context of either the 1993 Management Plan, which received wide community consultation, or current best practice related to the existing cultural heritage elements of the Park. Mr Reilly himself noted that a future update of the cultural heritage component of the Plan would take some time to complete because of the need for public consultation. It is abundantly clear that cultural heritage in its broadest sense is a significant concern in Prince Edward County.

Until there is a future update of the Management Plan, the legacy of the Park’s creation is a tapestry of cultural and natural elements and this unique manifestation in a Provincial Park needs to be respected. The push to convert the remnants of rural agricultural life to a natural environment endangers cultural resources like the Hyatt and MacDonald Houses, and is contrary to the policy requirements of the Provincial Policy Statement (PPS), 2014, shortly to be updated in 2020, which requires in Sentence 2.6.3 that all “significant” cultural resources “shall be conserved” – that is identified, documented, preserved and managed. The Hyatt and MacDonald Houses have a strong claim to ‘provincial significance’ under the criteria in Ontario Reg. 10/06. These issues most definitely need to be considered as part of the public consultation with the Prince Edward Heritage Advisory Committee for this project.

**Comments on the condition of the two houses arising from my February 28, 2020 site visit, in red font**

**1 (a) Hyatt (Gray) House**

**Subconsultant Engineer’s comments relied on by the Heritage Planner:**

Quotations from Engineer’s report	Letter writer’s response
<p>In my opinion the west wing will have to be demolished in its entirety. This opinion is based on the observed poor condition of all aspects of the structure. The floor framing is damaged, and it is likely that on closer inspection of the wood framing there will be significant rot found. The presence of other environmental contaminants also may not be able to be properly cleaned</p>	<p>These are sound observations of deterioration. However, given that the west wing has not collapsed and the Engineer did not structurally investigate the framing members, a current structural investigation is merited.</p> <p><b>The brickwork walls are stable and show no signs of settlement or spalling. The roof structure remains sound apart from the hole in the deck on the north side and the exposure of the top of the south wall. These can be easily and temporarily protected with sheet metal. The extent of damage to the wood log floor joists is partly concealed, but water from the hole in the roof has not caused widespread damage apart from the visible north ends of the log joists.</b></p>
<p>The roof framing is significantly undersized and would need to be rebuilt</p>	<p>Most 19<sup>th</sup> century framing is undersized by today’s standards. This is because the consistent quality of virgin wood could be relied upon, a quality that modern fast-grown wood does not possess. There is</p>

	<p>no apparent bending in the roof structures in the photos, which suggests that the roof can take traditional snow loads. It may be possible to supplement the existing structure, rather than incur the cost of rebuilding the entire roof.</p> <p>There was no sign of structural distress due to bending or dislocation of the log rafters, partly due to the very thick wood roof deck. The structure continues to perform satisfactorily. Unless a change was planned to the roof configuration, the Ontario Building Code would not require any upgrade to the existing roof structure.</p>
The tops of the brick masonry walls have been open to the weather and are anticipated to be deteriorated.	<p>The extent of openness to the weather is not made clear.</p> <p>This exposure does need to be temporarily repaired urgently, but the deterioration in terms of spalling and frost heave is limited to the top 3 or 4 courses of the wall, and is easily repaired.</p>
With respect to retention of the east and centre wings, the investigation concluded that additional investigation would be required to determine the architectural direction and financial investment required for their potential rehabilitation. The investigation recommended that, at the time, the following further investigations would be required to determine the potential for retention of the east and centre sections:	<p>Additional investigation is sound advice and still applies now.</p> <p>My inspection confirmed that the building is very accessible for assessment for rehabilitation, as the structures are typically sound and dry.</p>
Cleaning of the building. An environmental consultant should be retained to recommend an appropriate level of testing and cleaning protocol to ensure the building is free from mould and other health hazards.	<p>This is an important issue and such testing is needed before deciding whether rehabilitation is feasible.</p> <p>This remains a priority as mould could have been concealed during my winter inspection, but a sample examination of studs and beams did not reveal any signs of mould in staining or deposits, and the current environmental conditions with reasonable ventilation are not conducive to mould growth. Increased cross ventilation could be provided by small vents being added to the window opening plywood closures.</p>
The selective removal of finishes to expose the brick and wood.	<p>This still needs to be done, as part of a thorough and comprehensive examination and assessment</p> <p>This was comprehensively done in 2012. Very limited further opening up of the fabric would be needed to make an exhaustive examination.</p>
An inspection of the brick and wood framing to determine the percentage of these elements that would have to be replaced or repaired.	<p>Ditto</p> <p>Very limited further opening up would be needed. In an hour-long examination of the house, minimal repairs and replacements appeared to be necessary.</p>
<p>In addition, the following work was recommended as required in the event of restoration:</p> <ul style="list-style-type: none"> <li>• Reconstruction of portions of the stone masonry foundations.</li> <li>• Reconstruction of all exterior finishes, windows and doors.</li> <li>• Reconstruction or removal of chimneys.</li> </ul>	<p>This advice is sound but still very general and would need further detailed site examination and specification. These practical rehabilitation steps outlined by the subconsultant engineer do not indicate that the engineer believes that demolition is the logical conclusion.</p> <p>The house is set up currently for an efficient and</p>

<ul style="list-style-type: none"> <li>• Removal and reconstruction of the covered entrance to the basement.</li> <li>• Construction of additional roof framing for the east wing roof.</li> <li>• The front entrance porch should be removed [this was subsequently done].</li> </ul> <p>Remove overgrown trees, shrubs, and vegetation from around perimeter of building.</p> <ul style="list-style-type: none"> <li>• Protect foundations from excess water runoff by providing rainwater management from roof surfaces and direct water away from the building foundations.</li> </ul>	<p>detailed examination of the required scope of repair/replacement work. No further elements should be removed until this examination and assessment is undertaken.</p>
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### 1 (b) Hyatt (Gray) House

#### Heritage Planner’s comments in the HIA relying on information taken from the Engineer’s report:

Quotations from Heritage Planner’s comments in HIA	Letter writer’s response
<p>The interior of the building is, generally, in poor condition as a result of vandalism, animal droppings, and water infiltration.</p>	<p>The vandalism, droppings and water infiltration appear <u>limited and localized in the photographs and none indicate serious knock-on fabric deterioration</u>  <b>My site examination confirms this. The interior is not in poor condition. It requires work to be made habitable again, but the essential structure is in sound condition.</b></p>
<p>The west wing is the most deteriorated of the three sections; there is currently a hole in the roof and the floor and structural supports may be compromised.</p>	<p>This hole could be readily repaired temporarily with sheet metal and the surrounding wood fabric does not seem heavily impacted. “Structural supports <u>may be compromised</u>” indicates the need for further investigation. My inspection does not change these comments.</p>
<p>In general, excess moisture has led to continued peeling, warping, bowing and loss of finishes throughout</p>	<p>Bowing and warping are not evident in Figs 3 and 4. The peeling and loss of finishes is likely the result of sealing the windows up without provision for ventilation, which has resulted in very high interior relative humidity, and not the result of running water. Finishes are easily replaced.  <b>There is no visible bowing of structural members. The deterioration of finishes is typical for an unheated building where relative humidity levels can increase, but the damage is limited to paint finishes.</b></p>
<p>The failed west wing first storey floor and framing has continued to deteriorate beyond the poor conditions observed in 2012 and 2017. Almost the entirety of the floor has now failed and timber beams have been added to support the second storey, despite the failure of the first storey timber beams and flooring (Figure 5).</p>	<p>Evidence of this continued deterioration is not given. The temporary support appears to be effective, since there is no signs of distortion of walls or floors  <b>About half the floor is severely deteriorated. The temporary shoring has adequately stabilized the second floor structure.</b></p>
<p>A hole in the roof is clearly visible from the first floor (Figure 6).</p>	<p>The hole is near the eaves and can be temporarily closed with sheet metal.  <b>Confirmed that this can be easily achieved.</b></p>
<p>Flooring, throughout (not limited to the west wing),</p>	<p>This is not illustrated. There is no back up for the</p>

shows signs of excessive moisture and rot when stepped on. Some areas of the structure were not accessed due to safety concerns.	assertion. <b>The reported excessive moisture was not found and, apart from the floor directly under the hole in the roof, every other floor in the house was sound and could be walked on.</b>
Despite efforts to secure the structure, the incidents of pest infestation and droppings has continued (Figure 7) as has unauthorised entry and instances of vandalism (Figure 8 and Figure 9).	As stated above the evidence of these problems appears localized and limited and does not present evidence of continuing issues. <b>There were a few raccoons living in the house. Their droppings on the second floor are not causing any deterioration. Signs of vandalism were limited.</b>
In addition to previously identified concerns related to the foundations and masonry; the exterior plaster cladding was observed to be failing during the 2019 site investigations (Figure 10).	Fig. 10 shows that the exterior stucco (not plaster) has spalled. The damage to the brick work behind is limited and repairable, and more importantly answers Bradley Engineering's concern that it was not possible to determine at that stage whether the stucco was spalling or the brick veneer was bowing. <u>The brick bond indicates clearly that the walls are at least double wythe and not veneer and bowing is highly unlikely.</u> <b>The stucco was applied on ungalvanized metal lath nailed to the brickwork. The lath has now rusted and started to fail. Unfortunately in the area of failure that could be examined, the excessively hard Portland cement-based mix used for the stucco bonded too well to the brick face and removes the kiln face of the brick when it is removed. This may require re-stuccoing with a more appropriate soft lime-based mix if the bricks are too unsightly to be exposed. In localized areas the face of the bricks could also be consolidated with a solisic-ethyl-ester formulation combined with a hydrophobic treatment to keep exterior water out yet allow interior moisture to dry out through the pores of the brickwork.</b>

## 2 (a) MacDonald House

### Subconsultant Engineer's comments relied on by the Heritage Planner:

Quotations from Engineer's report	Letter writer's response
In my opinion, the structural components of the main sections of the building (East Structure and West Structure), which were the focus of this report, have useful life remaining. Therefore, the structural rehabilitation component of the entire project will not be the critical factor when deciding on proceeding with the rehabilitation.	This assessment was made 7 years ago, but affirms the soundness of the structure. These comments do not support a conclusion for demolition, but given that the comments are 7 years old, a new structural assessment is needed before the future of the building is decided. <b>The building structure has previously been exposed on the interior and initial examination suggests that little additional deterioration has occurred. A new assessment is needed mostly to determine the scope of repair and upgrade work.</b>
An environmental consultant should be retained to	This is very sound advice. The ventilation suggested



<p>recommend an appropriate level of testing and cleaning protocol to ensure the building is free from mould and other health hazards.</p>	<p>above and in Engineer's 2012 report would likely solve this issue.  There appears to be sufficient ventilation occurring through gaps in the window opening closures to limit or prevent mould growth. Any other modern hazards such as asbestos have been removed as part of the removal of interior finishes and services. The environmental testing should still be undertaken.</p>
<p>Proper ventilation and control of moisture in the basement will minimize the amount of water that moves between the mortar joints, which results in deterioration of the joints and a loss of integrity of the stone masonry foundation walls.</p>	<p>Ditto  The stone foundation walls are massively thick and in excellent structural condition. The interior pointing of the stonework is also sound. There are no signs of leaching of the mortar bonding the stones, which would leave a small pile of lime along the base of the walls. Even if this had been removed when the finishes were stripped, it would start to build up again within a year or two if leaching due to water infiltration was occurring.</p>
<p>If lathe is being removed from the interior face of the wood studs framing the wall, AND no board sheathing is found on the outside face of the studs, the walls must be adequately braced and some other form of permanent bracing must be reestablished [sic] (i.e., plywood).</p>	<p>This is sound advice. Adding bracing if there is no sheathing would be done in proper sequence to safeguard the stability of the walls. There would be no risk to the structural stability of the building.  Wood sheathing was visible and stable on the outside face of the studs of the exterior brick-veneer walls.</p>
<p>The stucco finish may have been original or added later. Regardless, the stucco is currently providing the barrier to weather and must be cleaned, repaired, or selectively removed and replaced, to maintain its integrity. Diligent effort must be made to select appropriate material and methods for cleaning and repair of stucco.</p>	<p>This is sound advice given that the reason for adding the stucco is unknown. The exposed brick appears in sound condition.  The stucco is a later addition, as evidenced by the metal lath. Cleaning of the stucco would serve no useful purpose. The extent of removal necessary to restore the integrity of the stucco will need further examination. The lime-based materials to be used to repair the stucco are a well-established part of heritage masonry repair techniques. As discussed above, depending on the condition of the brick face when the loose stucco is removed, it may be possible to leave the brickwork exposed.</p>
<p>Remove overgrown trees, shrubs, and vegetation from around perimeter of building.</p>	<p>Removal is part of ongoing preventive maintenance for an older building.</p>
<p>Protect foundations from excess water runoff by improving rainwater management from roof surfaces, direct water well away from the building foundations, and maintain these systems. Water infiltration through masonry joints is extremely detrimental to the overall integrity of stone masonry foundation walls.</p>	<p>Ditto, and as a relatively cheap and easy intervention to protect the foundation stonework from water  The basement foundation walls could not be examined as the basement stair has collapsed in such a way to make it impossible to access using a ladder. Exterior examination of the walls did not indicate any signs of settlement of the walls, which would occur if there was severe deterioration of the foundation stonework. It would be wise to examine these walls asap.</p>

## 2 (b) MacDonald House

### Heritage Planner's comments in the HIA relying on information taken from the Engineer's report:

Quotations from Heritage Planner's comments in HIA	Letter writer's response
<p>The rear addition along the east wing has been removed (Figure 5 and Figure 6). The removal of this addition has resulted in the exposure of the rear wall of the west wing (Figure 7) - constructed as an exterior wall, but in a questionable state of repair - and an open gap along the second floor joists (Figure 8).</p>	<p>The rear wall shown exposed in Fig. 7 was constructed as an exterior wall and most of its shiplap siding, which sheds water, appears to be intact. The roof eaves that overhang above will also protect the wall. Minor temporary repairs may be needed to make the wall watertight, but it is not in a "questionable" state of repair. The open gap is where the former lean-to rear addition (Figs 5 and 6) connected to the west wing. The boards here have been disturbed, allowing in the light. This is right under the eaves overhang, so partly protected. The gap could be easily closed by temporary metal or wood boards.</p> <p><b>My previous comments were confirmed by my examination. Water is not saturating this wall.</b></p>
<p>Deterioration of the envelope has resulted in a number of concerns, including evidence of wildlife intrusion and evidence of mould, fungi, mildew and visible rot and warping caused by excess moisture from water infiltration (see Figure 8 to Figure 16). On the day of the site visit, portions of the floor felt spongy throughout.</p>	<p>The wildlife intrusion indicated by animal droppings in Fig. 9 is limited. The extent of dampness and mould shown in Fig. 10 is no great threat. The floor damage illustrated in Fig. 12 shows warped t and g floorboards; however, there is no sign that the integrity of the subfloor is compromised. The hole in the roof in Fig. 13, which caused the water infiltration, is small and can be temporarily closed with sheet metal or roll roofing. The building fabric around the hole shows little sign of damage.</p> <p><b>The wild life intrusion has been stopped. There were no droppings in the house. With the entire structural wood framing exposed, no evidence was observed of fungi, mildew, visible rot or warping. Limited mould would be suppressed by winter conditions, and the extent of ventilation and air movement would inhibit mould growth even in warmer weather. Fig 12 shows the only area of narrow oak flooring on the second floor that has warped. The subfloor was sound and the floor was walked on with no signs of distress. Apart from the floor directly under the hole in the roof, every other floor in the house was sound and did not feel spongy when walked on.</b></p>
<p>Visible portions of the rubblestone foundation and exposed brick and mortar have continued to crack, spall and otherwise deteriorate and separate (Figure 17 and Figure 18).</p>	<p>There is one crack shown in Fig. 17 in the foundation wall, but there is no sign of movement or settlement existing or continuing. Otherwise, the stone foundations are in good condition, needing limited</p>

	<p>repair, and the newly exposed brickwork is not spalled or otherwise deteriorated. No evidence is provided to indicate continued opening up of the crack to the lean-to entrance shown in Fig. 18, and the existing movement in no way threatens the structural integrity of that small addition.</p> <p>Site examination showed that the crack in Fig. 17 is old and not active. It was the only crack seen in the foundation wall and it does not continue into the ground floor structure. The crack in Fig. 18 has not altered since the photo was taken and is no risk to the building or itself.</p>
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**Conclusion**

The recommended public consultation with the Prince Edward Heritage Advisory Committee needs crucially to occur before any decision is made and the Heritage Impact Statements for the two houses revised on three main grounds in order to make an informed decision. The three grounds are:

1. Correct the mistaken observations and analysis of the current building conditions, which lead to inappropriate conclusions. As currently written, the two HIAs do not form the basis for making sound and fundamental decisions about the future of the houses, contradict long-established heritage conservation principles, and ignore heritage best practices.
2. Add a discussion of the community’s understanding of the cultural heritage value of the buildings, obtained through consultation, in relation to the provincial policy framework.
3. Recognize the 1993 Sandbanks Management Plan as representing the community’s values through extensive consultation and adjust the Parkabs Department’s current approach to allow a multiplicity of cultural values to continue to co-exist for as long as the 1993 Management plan is in force. It may in the future be subject to a thorough review and update, with extensive public consultation and in close cooperation with the Municipality of Prince Edward.

Once decisions about the houses are put on a sound and logical basis, backed up by credible HIA conclusions, discussions about third party involvement in the development and management of the buildings become possible. This would necessarily involve a detailed and open-ended study for their retention, rehabilitation, and repurposing, including the development of a financial analysis and business case.

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