

July 23, 2019

ATTN: Hon. David Eby, Q.C.
Attorney-General and MLA for Vancouver-Point Grey
(250) 387-1866
AG.Minister@gov.bc.ca

Dear Mr. Eby,

Open letter from the BC Association of Heritage Professionals regarding Town of Comox petition to demolish Shakesides and intent to revise terms of Mack Laing's Charitable Purpose Trust

On behalf of the BC Association of Heritage Professionals (BCAHP), I would like to express our deep concern about the potential loss of a historic place, *Shakesides*, of Provincial and National interest in Comox, British Columbia. Please accept this open letter in support of the petition by the Mack Laing Heritage Society of the Comox Valley.

Shakesides is the former home of the late acclaimed ornithologist, Hamilton Mack Laing, and is considered an invaluable heritage asset of the community. Mack Laing deeded his property and home to the Town of Comox in trust and perpetuity to be used as a public nature park, which includes his original home *Shakesides*, built in 1950. Despite Laing's vision to rehabilitate the residence into a natural history museum, the Town of Comox recently resolved to demolish the historic residence, and to use Section 184 of the Community Charter to vary "the trust applicable to the money so as to allow funds to be used for construction and maintenance of a viewing platform on the site of *Shakesides*."

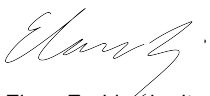
In 2017, a Statement of Significance was completed to describe the heritage values of the place. A condition assessment of the historic structure was also conducted in the same year by an independent heritage professional and structural engineer. The assessment concluded that the building is in good condition to be rehabilitated for adaptive re-use as envisioned by Hamilton Mack Laing.

Gord Macdonald, Heritage BC Chair, shares our belief that the stated heritage value of *Shakesides* demands that Hamilton Mack Laing's former home be "conserved for ... future generations" and that the Town of Comox should "use the building in ways that will conserve its heritage value." Heritage BC has committed to providing their assistance, at no charge, to the Town of Comox, for the duration of the process to repurpose *Shakesides*, and guarantee the town a provincial grant through the Heritage Legacy Fund (HLF) *Heritage Conservation Program*. To this date, the Town of Comox has ignored this offer by Heritage BC.

On behalf of the BC Association of Heritage Professionals, I am concerned about the potential loss of *Shakesides*. The demolition of this historic structure, the unsympathetic heritage interpretation of the site by constructing a viewing platform and the proposed varying of the Mack Laing Trust Fund to cover insufficient funds for construction, do not promote responsible conservation practice to help protect our historic places. The interventions proposed by the Town of Comox do not meet the *Standards and Guidelines for the Conservation of Historic Places in Canada*.

Our organization can speak to the importance of conserving *Shakesides* as an important heritage asset that represents the heritage values that extend much further than the boundaries of the Town of Comox. I remain optimistic that historic places such as *Shakesides* can be conserved and protected for the future and we strongly encourage this government to take on that leadership role.

Yours truly,



Elana Zysblat, heritage consultant
President, BC Association of Heritage Professionals



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