



**association to protect
AMHERST ISLAND**

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Dear Mr. Fairfield;

Please find enclosed APAI's review of the Archaeological Reports associated with the proposed Amherst Island Wind Energy Project. Hard copies will follow shortly.

Our comments on these reports were informed in part, by independent input of Dr. Jeffery Seibert, Senior Archaeologist at the Cataraqui Archaeological Research Foundation.

APAI requests access to the survey documentation for the sites that were assessed and photos of cultural material collected during the survey. Of particular interest are the records from the archaeological survey that was carried out as a result of the revised site plan which was issued in August 2012.

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Association to Protect Amherst Island (APAI)
REVIEW, COMMENTS AND QUESTIONS

DRAFT ARCHAEOLOGICAL REPORTS

1. Underwater Archaeological Assessment
2. Stage 1 Archaeological Assessment
3. Stage 2 Archaeological Assessment

1. Underwater Archaeological Assessment – Comments and Questions

a. Canadian Standards and Guidelines for Underwater Archaeological Survey

The proponent has used the Nautical Archaeological Society's practices and principles in conducting the underwater survey. This is not appropriate. Canada has its own standards and guidelines that must be applied. Federal laws and guidelines are especially relevant in underwater archaeological sites in Canada.

“Archaeologists working on Parks Canada lands and lands underwater must use the *Parks Canada Archaeological Recording Manual: Excavations and Surveys* in order to respect a standardized and systematic approach to record sites and resources. They must also refer to the Management Directive 2.1.23 *Collections Management System: Archaeological Services*. The *Standards and Guidelines for the Conservation of Historic Places in Canada* are also a source of reference.” (p.15, Parks Canada, Guidelines for the Management of Archaeological Resources, 2005, p.15)
<http://www.pc.gc.ca/docs/pc/guide/gra-mar/page15.aspx>

APAI requests that the proponent and the Ministry confirm that the Parks Canada guidelines and all relevant federal legislation have been adhered to (e.g. buffer zones).

Is Algonquin Power working in collaboration with the federal Parks Canada authorities?

b. The Schooner *B.W. Folger*

The B.W. Folger wreck, located in Kerr Bay is possibly the closest unregistered wreck to the project components as it lies in the general area proposed for the permanent dock on Amherst Island. It does not appear in the report. This wreck was included in Chris Kohl's *Treacherous Waters: Kingston's Shipwrecks* and other web sources. This wreck needs to be registered with the MCTS and assessed.

There is an unconfirmed oral history of another wreck and/or cultural material to the southwest of the proposed location for the permanent dock.

Dr. Seibert provided the following recommendations with respect to the B.W. Folger and other potential archaeological sites in the vicinity of the proposed permanent dock.

With regards to the underwater site (the wreck of the B.W. Folger), as the site in question is located where the pier will be located it should be registered as an archaeological site with the MTCS. Whether this results in an avoidance or a mitigation strategy to manage the cultural resource is unknown, but this piece of information should be brought to the attention of the MTCS. (Seibert, 2013, p.3)

In addition, I recommend further consultation with the MTCS re the importance of the identified underwater sites and the as of yet un-registered site(s) that might be present in these locales, in addition to the seven identified potential sites. (Seibert, 2013, p.3)

- **It appears that Kerr Bay and the area in close vicinity to the permanent dock where much of the marine traffic will occur has not been researched or investigated. Will Algonquin Power ensure protection of underwater archaeological resources and conduct further investigation of Kerr Bay in consultation with the MCTS?**

2. Stage 1 Archaeological Assessment – Comments and Questions

a. A massive Industrial Power Plant will destroy the unique and irreplaceable cultural heritage landscape of Amherst Island.

Algonquin's Stage 1 Archaeological Assessment concludes the following: "Amherst Island demonstrates an elevated potential for the presence of significant archaeological deposits of integrity".

We strongly concur with this statement and believe that given the Island's rich cultural heritage, the entire Island should be preserved and protected for future generations.

The archaeological evidence of Aboriginal occupation on the Island dates 4000 years ago. The Island's strategic location on the Great Waterway and successive ownership by Europeans, starting in the early 17th century with the French, followed by the British, the United Empire Loyalists, the Quakers and the Irish have shaped the Island's character and its cultural landscape. Amherst Island is so much more than an industrial complex. It is a step back through time and the entire Island should be protected by a cultural heritage designation.

Should the project go forward, APAI recommends that a systematic archaeological survey of Amherst Island be carried out prior to construction.

b. Algonquin Power did not undertake a consultation with local groups and individuals, on locally known archaeological sites.

As is the case in many small rural communities and especially in Southeastern Ontario, there has not been a systematic archaeological survey of Amherst Island. The fact that no land sites have been registered was not unexpected.

No archaeological assessment can be considered complete without consulting with local residents. Ministry guidelines are clear on the importance of consultation with residents and groups early on in the REA process. Going forward, Algonquin Power needs to consult with Island residents to ensure that archaeological sites and sacred burial sites have not been missed.

There are however a number of people living on Amherst Island who have found archaeological material here. There are a few small displays of Aboriginal artifacts in the Neilson's Store Museum and Cultural Centre and there are numerous oral histories documenting Aboriginal presence on the Island in local records and published in "The Amherst Island Beacon". This newsletter is one of the best vehicles we have on Amherst for preserving the Island's rich cultural heritage.

The 2011 MTCS Bulletin for Applicants states the following:

Conducting full assessments that include appropriate recommendations ensures that cultural heritage resources are identified, evaluated and protected and reduce any potential risks and delays to development.

Knowing from an early stage what resources exist at the project location (the entire Island) helps applicants propose an approach to designing, planning and implementing their project in a way that considers and avoids or mitigates impacts to these resources, consistent with O.Reg 359/09

*This approach would provide the applicant and the public with more certainty that cultural heritage resource concerns have been adequately addressed. It would therefore, be less likely that issues or information related to archaeological or heritage resources would come to light later in the process which could delay the completion and approval of an application.*¹(MTC, 2011; p.4-5)

A member of the archaeological team did visit the Museum in July 2011 and volunteers provided some information however the visit was very brief...not designed to collect documentation. A local resident sent an email to Sean Fairfield on October 25, 2012 asking if the archaeologists had spoken to locals to identify unregistered archaeological sites on the Island. To date, there has not been a response from Algonquin Power.

A half day visit to our museum or a discussion with two or three people who are involved in preserving the heritage of Amherst Island early on in the process, would have revealed

the locations of a number of known and potential archaeological sites on the Island. Unfortunately, the developer's team made no effort to interview the local people early on in the process.

Should the project proceed, what steps will Algonquin take to ensure that unregistered existing and potential archaeological sites will be captured in the assessment?

c. The “Old Reserve”

There are a number of locally known sites however the most noteworthy is a site that Islanders refer to as the “Old Reserve”. What we do know from the oral histories, and there are a number that are well documented, is that the Mohawk inhabited this site seasonally and potentially year round from the mid-18th century into the 1920s. There are numerous artifacts on the Island that attest to the existence of this Mohawk settlement. One of the oral histories suggests there may be Aboriginal burials in the area.

The extent of the site is not known. It is also not clear how long the Mohawk or potentially other groups such as the Huron and other Five/Six Nations may have frequented this location. Historical research is continuing and we are beginning to understand why this area attracted Aboriginal peoples through time.

The Old Reserve is a potential archaeological site located in the general area of the southern portion of Lot 58 Second Concession. At least three turbines are planned for the general vicinity of the site. The Stage 2 assessment found archaeological evidence north of the area and therefore it is one of the sites slated for Stage 3 investigation.

We believe that there is a high potential for archaeological resources and we want to ensure that the integrity of the site, if identified, is not compromised by the massive disturbance that will inevitably take place if the project is approved.

Dr. Jeff Seibert in his review states:

With regards to the question of the “old reserve” – if the area does indeed have archaeological potential, as it appears to, it would be important to define the site/area...the MTCS should continue to be involved in the management of the site, and the oversight of the strategies used to avoid impacts on the site.” (p.2)

“Concerns were raised that the site is indeed too close to proposed turbines and concerns were raised to the MTCS regarding the impact of this on the extant cultural resources. This should be continued, and the MTCS be informed of any changes. (Review, 2013, p. 3)

How will Algonquin mitigate the impacts on the “Old Reserve” site if there is evidence confirming its presence in close proximity to the three turbines presently proposed for that area?

3. Stage 2 Archaeological Assessment

Seven (7) potential sites were recommended for further investigation, four on Amherst Island and three on the mainland.

a. The “Old Reserve”

As mentioned previously, one of the sites discovered during the Stage 2 investigations is in close proximity to the “Old Reserve” and therefore a Stage 3 assessment will be required.

Dr. Seibert advises,

In the case of Aboriginal sites identified, following standard 3.5.1 in the 2011 Standards and Guidelines for Consultant Archaeologists, consultation with Aboriginal Communities must be carried out when rare aboriginal sites are being investigated. The investigation of the banner-stone find spot might just be deemed to be a rare site, owing to the small number of these artifacts recovered in situ and might require consultation.”

And further,

It is recommended that Aboriginal monitors are brought on board for all Stage 3 and 4 investigations on Aboriginal sites and that the descendant community be consulted with regards to the “Old Reserve”. (Seibert, 2013, p.3)

Will Aboriginal monitors be on site for Stage 3 (and 4) investigations of Aboriginal sites and including the area in close proximity to the “Old Reserve” site?

b. Conducting a Full Assessment

- **Survey of Turbine Pads**

The area disturbed when constructing turbine pads is significantly larger than the pad itself <http://docs.wind-watch.org/image002.jpg> In general, how large an area is surveyed when investigating the turbine pads?

- **Survey of Road Beds**

We understand that many of the collector cables will be located within the roadbed. In the case of gravel roads, will an archaeologist be on site when these trenches are being prepared?

- **Additional Stage 2 Assessments Will Be Required if the Site Plan Changes or Areas have been missed**

Following the repositioning of a number of turbines and publication of a revised site plan in August 2012 did Algonquin Power conduct archaeological survey of these new areas? We would like to review the documentation from all areas surveyed and request access to this documentation. Will this same documentation be submitted to the Ministry for their review and for their record?

If there are changes to the project infrastructure as a result of the consultations will Algonquin Power be required to carry out Stage 2 assessments in newly defined, undisturbed areas?

Can you please describe the general process for ensuring a full assessment when the construction plans will not be finalized until after the REA approval?

- **Stage 2 Archaeological Assessment of Collector Cable Locations, Fence Lines and Road Allowances**

Dr. Jeff Seibert also raises the following issues in his review (p.3):

With regards to transmission lines and areas impacted by fencing – have these been assessed? If not, they should, especially in the case of the transmission lines located within 300m of the shoreline or other archaeologically sensitive areas. In addition, areas to be fenced off should fall within areas already examined under the Stage 2 assessments OR additional assessments should be conducted if the fencing is large enough to necessitate significant subterranean disturbances (ie large concrete anchors for fence posts).

We noted that Nick Adams, the independent archaeologist who conducted the archaeological survey (Stage 2) for WPD and the White Pines Project investigated all the road allowancesⁱⁱ for potential archaeological sites. It appears that this has not been done in all locations on Amherst Island. Can you clarify Algonquin's plans re: collector cables in the road allowances?

We are aware that are human burials in the strip of land (including the road allowance) between the cemetery gates and the roadway immediately south of Pentland Cemetery, on Front Rd. Can you explain where the collector lines will be located on this stretch of road and what steps will be taken to avoid this location?

e. Concerns and Questions Regarding the Stage 3/4 Assessments

Dr. Seibert recommends the following:

When will the Stage 3 Archaeological Assessments be carried out?

Once the aforementioned stage three and four assessments are completed, development might proceed, so it is important to identify supplementary concerns to the MTCS as soon as possible to allow time for these concerns to be addressed. (Seibert, 2013, p.3)

In addition to liaison with the Ministry, how will Algonquin Power inform local residents of the results and recommendations coming out of the Stage 3 & any Stage 4 assessments?

Will residents have an opportunity to comment on this report and express their concerns?

END of DOCUMENT

ⁱ Ministry of Tourism and Culture *Protected Properties, Archaeological and Heritage Resources*, 2011, p. 4-5

ⁱⁱ Adams, Nick Archaeological Report for the White Pines Project
http://canada.wpd.de/fileadmin/pdfs/WhitePines/WPWF%20%281-41-013%29_AA_28June2012.pdf