



Cataraqui Archaeological Research Foundation

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Peter Large, President

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Association to Protect Amherst Island (APAI)

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cc.

Laurie Kilpatrick

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Dear Mr Large and Ms Kilpatrick

Please find attached the findings of the report review / analysis for the documents that you submitted to CARF for review as part of the public consultation process for the Amherst Island wind farm. The findings are based on a careful consideration of the materials provided in the context of the regulations / standard and guidelines for archaeologists working in the Province of Ontario.

Amherst Island – Summary of Findings

- Both the stage 1 and stage 2 assessment s appear to have been conducted to professional standards, indeed, the documentation of isolated find sites and rationales offered for

recommendations for further work all suggest that due diligence was pursued in the execution of the Stage 1 and 2 deliverables

- Seven (7) potential archaeological sites were recommended for further investigation (in the form of a Stage 3 investigation). These include both Euro Canadian occupation sites in addition to isolated find sites of aboriginal artifacts where the artifacts in question represent rare and or important artifacts (ie AIWP site #4 which consists of a Late Archaic Lamoka projectile point [Varley 2012: 23] or AIWP #7, which appears to be a fragment of a slate bannerstone [Varley 2012:24]). These later examples are significant, once again, because they entail a level of professional judgement and responsibility that meets the standards and guidelines.
- With regards to the protocols to be followed in pursuit of these stage 3 investigations, Varley (2012) recommends following all of the requirements of the 2011 Standards and Guidelines in pursuit of the stage 3 investigations. Once again, this follows all legal requirements under the heritage act and all regulations under the Ontario standards and guidelines.
- 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. That said, unless the area is under direct threat of development, instead of inside the noise impact area / setback it would be tough to argue that the site itself is indeed impacted by the installation of the turbines as opposed to people’s ability to use it. If this area were indeed utilized by descendant populations of First Peoples then this impact on use might be relevant, but preservation of the site through avoidance and / or non impact is an allowable mitigation strategy from what I can tell.

That said, 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. Based on correspondence made available to me, it appears as if dialogue has been initiated between ARO Paige Campbell and interested parties on Amherst Island in this regard. Concerns were raised that the site is indeed too close to proposed wind 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.

- With regards to transmission lines and areas impacted by fencing- have these been assessed through these studies? 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 with 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).
- 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.
- 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. 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.

- 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 consulted 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. 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"

I sincerely hope that these observation / analysis is valuable for determining how best to engage with the Provincial government regarding questions relating to this project. Ultimately, however, all decisions made are made by the Ministry of Tourism, Culture and Sport, and we at CARF assume no responsibility for their decisions.

Regards,

A handwritten signature in blue ink, appearing to read 'Jeff Seibert', is written on a light yellow rectangular background.

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