

**Stage 1 Archaeological Assessment:
Proposed Natural Gas Pipelines to Serve
Southern Bruce**

Geographic Townships of Kinloss, Huron,
Kincardine, Bruce, Greenock, Brant, Elderslie,
Bentinck, and Sullivan, now Township of
Huron-Kinloss, Municipality of Kincardine,
Municipality of Brockton, Municipality of
Arran-Elderslie, Municipality of West Grey,
and Township of Chatsworth, Bruce and
Grey Counties, Ontario



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PIF Number: P392-0189-2016
Project Number: 160950831

SUPPLEMENTARY DOCUMENTATION

January 14, 2019

STAGE 1 ARCHAEOLOGICAL ASSESSMENT: PROPOSED NATURAL GAS PIPELINES TO SERVE SOUTHERN BRUCE

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Indigenous Engagement
January 14, 2019

1.0 INDIGENOUS ENGAGEMENT

The Ontario Government's 2011 *Engaging Aboriginal Communities in Archaeology* (Government of Ontario 2011) draft technical bulletin states in Section 1.2 that for archaeological projects in Ontario it is encouraged that Indigenous communities are engaged during the following:

1. Stage 1, when conducting background study;
2. Stage 1, when evaluating potential;
3. Stage 2, when assessing a property and determining whether or not a site should go to Stage 3; and,
4. Stage 3, when making recommendations to excavate or preserve Aboriginal sites.

This supplementary documentation provides documentation and correspondence of the engagement that was conducted during the Stage 1 archaeological assessment of the proposed natural gas pipelines to serve southern Bruce study area. This consists of the review letter provided by Dr. William Fitzgerald, correspondence coordinating the subsequent site visit (November 20 and 21, 2018) concurring that weather conditions were agreed to be adequate to not reduce the chances of observing features of archaeological potential, and correspondence from Dr. William Fitzgerald confirming that he was satisfied that his comments had been addressed in discussions on November 20 and 21, 2018).

Stage 1 Archaeological Assessment: Proposed Natural Gas Pipelines to Serve Southern Bruce – Geographic Townships of Kinloss, Huron, Kincardine, Bruce, Greenock, Brant, Elderslies (*sic*), Bentinck and Sullivan, now Township of Huron-Kinloss, Municipality of Kincardine, Municipality of Brockton, Municipality of Arran-Elderslie, Municipality of West Grey, and Township of Chatsworth, Bruce and Grey Counties, Ontario

MTCS PIF P392-0189-2016

Study Area: corridor between Dornoch (Township of Chatsworth, Grey County) via the Bruce Energy Centre (Municipality of Kincardine, Bruce County) and Lucknow (Township of Huron-Kinloss, Bruce County)

Project Nature: natural gas distribution system: 127 kilometres of main pipeline plus 165 kilometres of distribution network piping

Project Proponent: EPCOR Natural Gas Limited Partnership (Aylmer)

Archaeological Consultant: Stantec Consulting Ltd. (Markham)

MTCS Assessment Stage: Stage 1 background study (evaluation of archaeological potential)

Dates of Corridor Inspection: June 20-22, 2016; July 14, 2016; April 24, 2018

Date of Report: July 17, 2018

SON EO Review (William R. Fitzgerald, Ph.D.): October 2018

Stage 1 Components

- an evaluation of the potential for the presence of Indigenous and Euro-Canadian archaeological resources along the proposed route that consists of the current municipal right-of-way (ROW) and a ten-metre buffer implementing basic 2011 MTCS compliance archaeology standards, consisting of:
 - an overview of the landscape and cultural heritage within the study and surrounding areas
 - a compilation of known and potential archaeological resources within the study area
 - a visual inspection of current corridor features and conditions
- presentations of strategies for Stage 2 property and Stage 3 cemetery investigations

Stage 1 Results

- visual inspection has determined that a large portion of the study area has been subject to extensive land disturbance caused by roadway and infrastructure installation which has removed archaeological potential within the majority of municipal ROWs and some adjacent buffer areas
 - low to no archaeological potential has been assigned to areas of steep slope and
-

permanent wetland

- archaeological potential is considered to exist within the peripheral ten-metre buffers and part of the Kincardine by-pass
- sections within and outside of the ROWs are considered to possess potential for the presence of deeply-buried archaeological resources
- four cemeteries exist within the study area

Stage 1 Recommendations

- the majority of the study area is considered to have been previously disturbed or is steeply-sloped and wetland – these areas are considered not to possess archaeological potential and do not require further archaeological assessment
- in those areas that possess archaeological potential and that will be impacted by pipeline installation, undertake Stage 2 archaeological assessment
 - generally the Stage 2 methodology will involve the excavation of 30cm-diameter shovel test-pits at five-metre intervals
 - where deeply-buried archaeological deposits may exist – areas of aeolian or alluvial deposition, shovel test-pits will be excavated at ten-metre intervals to determine stratigraphy
 - where roadbeds appear not to have caused deep disturbance, shovel test-pits will be excavated at ten-metre intervals to determine if portions of the original ground surface remain intact
- areas adjacent to the currently-defined limits of the four Euro-Canadian cemeteries be mechanically-stripped of topsoil and the exposed subsoil be examined for grave shafts and human remains

Fitzgerald Comments

Overall, Stantec's Stage 1 archaeological assessment report of the proposed southern Bruce natural gas distribution system is nicely presented and in some instances exceeds MTCS's minimal Stage 1 standards.

While their proposed post-Stage 1 investigative strategies are sound, there are errors and omissions in their formulation that will necessitate a reconsideration of their evaluations of archaeological potential in certain locations. A seeming lack of familiarity with the natural and cultural heritage of the study area is largely responsible. Consultation with SON during Stage 1 would have provided area-specific historical and archaeological evidence or leads that would have produced a more accurate and thorough portrayal of the Indigenous and Euro-Canadian culture history of the study area (and Bruce and Grey counties in general) from which a more comprehensive and reliable assessment of archaeological potential could have been presented.

First, three logistical pipeline questions directed at EPCOR.

1. Will the precise route and placement of the main pipeline within the study area corridor be determined prior to the Stage 2 archaeological assessment?
2. If not, will the entire width of the study area corridor (i.e., the twenty-metre wide municipal ROW plus peripheral ten-metre buffers) be assessed?
3. In addition to the 127 kilometres of main pipeline, will the 165 kilometres of distribution network piping – presuming this to be the supply connections from the main pipeline to residences and businesses, be subjected, where warranted, to Stage 2 archaeological assessment?

While Stantec's Stage 1 archaeological assessment report tends to be overly detailed where unnecessary (eg., soil inventory and profiles, watershed descriptions), it fails to address pertinent natural and cultural heritage criteria that would contribute to a more comprehensive evaluation of the study area's archaeological potential.

Stantec's evaluation of archaeological potential within the study area would have benefited from a more thorough understanding of local landscape conditions and formation processes, Indigenous and Euro-Canadian history, and past archaeological investigations.

1. Cultural Overview

The virtual absence of locally-specific archaeological sources and dependence, in some instances, on less-than-reliable secondary historical sources for their overviews of the Indigenous cultural history of what are now Bruce and Grey counties tends to lessen confidence in other aspects of the assessment.

2. Previous Archaeological Investigations

Forewarned is forearmed. The examination of previous archaeological research and compliance reports generally provides important background information and leads for current archaeological assessments. To ensure a comprehensive Stage 1 evaluation of archaeological potential, knowing what archaeological resources have been found and where – and where they haven't, increases confidence in the results and recommendations not only of the Stage 1 assessment but also the direction of the Stage 2 property investigation.

Stantec's background research identified two previous archaeological assessments that had been conducted within fifty metres of the study area. In fact, at least an additional thirteen Stage 1 through Stage 4 archaeological assessments have been conducted within fifty metres of the pipeline study area. All are on file with MTCS or are available from the SON EO.

3. Unconfirmed Speculation

Notable in the Stage 1 assessment is the assumption/assertion that the majority of the ROW has been severely disturbed, destroying any archaeological resources

that may have been present within it, thus eliminating the need for Stage 2 property investigation.

Without confirmation, such sweeping declarations (potential archaeological site death sentences) should not be made. A visual inspection of the entirety of the study area conducted by SON on October 10 and 12 suggests that the original topography of sections of the ROW may not have been altered, in particular areas located toward the ROW edges.

4. “Deeply-buried” Archaeological Resources

Stantec did – to their credit, identify several sections within the ROW where original ground surfaces may remain intact but “deeply-buried” beneath the current ground surface. This consideration is thought to have been the result of: 1. roadbeds having caused minimal disturbance to the original ground surface; or 2. the accumulation of aeolian (wind-borne) and/or alluvial (river-deposited) sediment atop original ground surfaces.

Stantec proposed that test-pits will be excavated at ten-metre intervals in roadbeds where “deeply-buried” ground surfaces may exist. Where in the ROW would these test-pits be excavated – through the road or to its side? And why at a ten-metre interval?

Areas of “documented” aeolian deposits will be test-pitted at ten-metre intervals; those of “documented” alluvial deposits at five-metre intervals. Where have these been documented by Stantec in the study area? Why the difference in Stage 2 test-pit intervals?

Had Stantec’s background research been more thorough they would have realized that archaeologists have identified and extensively investigated areas of aeolian and lacustrine (lake-deposited) deposition in the immediate vicinity of the study area. These deposits present archaeological challenges. Consultation with archaeologists (and the SON EO) would have provided Stantec with invaluable information about how to identify and investigate areas where paleosols (buried ground surfaces) are likely to be present within the study area.

5. Steep Slopes

Should all areas identified as being steeply-sloped be excluded automatically from Stage 2 assessment? Narrow terraces on slopes can accommodate smaller, presumably short-duration Indigenous habitation sites. For instance, archaeological sites are frequent occurrences on terraces no wider than several metres in steeply-sloped areas of the Bruce Peninsula National Park and Fathom Five National Marine Park.

6. Quaternary Geology

In an area that has been inhabited continuously for the past 11,000 years, it must be appreciated by the archaeologist that the landscape has not remained unaltered.

The 21st century landscape should not be the lens through which the identification of potential archaeological site locations from across the post-glacial era may or may not be expected can be confidently made. Lakeshores, for example, when both active and abandoned were the focus of a wide range of cultural activities.

On page 1.17 Stantec states that the “shore cliffs” within the study area’s section of the Huron Fringe physiographic region probably correspond to the shore of glacial Lake Warren. Elsewhere (page 3.2) they note that, “*The study area is located in proximity to an extinct shoreline of a former glacial lake*”. They neither identify or locate such shore cliffs or shoreline. That is the extent of their awareness of such a significant criterion for identifying Indigenous site locations.

In fact, three well-documented peri- and post-glacial shorelines exist not just in proximity to the study area but within substantial sections of the study area (Lake Warren, Main Lake Algonquin, Nipissing Great Lakes). In some locations the remains of these relict water bodies (eg., barrier beaches, lakeshores, strandlines, bluffs, and dunes) are readily apparent, elsewhere they tend to be more subtle. Their occurrence went unnoticed by Stantec, despite in several instances being photographed atop the very pronounced MLA and NGL bluffs!

7. Surveyors’ Records

Provincial land surveyors’ plans, field notes, diaries, and reports from the 1840s and early-1850s frequently contain cultural information that can elevate the thoroughness of, and confidence in Stage 1 archaeological assessments. Included amongst surveyors’ observations during the establishment of township and townplot grid systems in what are now Bruce and Grey counties are precise locations of Indigenous habitation, resource-procurement and ritual sites, Euro-Canadian squatters’ homesteads, existing trails, and even deer river crossings and “salt-licks”.

While it is commendable that Stantec examined the initial township plans, potentially archaeologically-relevant observations recorded in the field books tend not to be marked on the survey plans. Examining the plans should not be considered as an adequate substitute for reviewing the original field records.

Fitzgerald Recommendations

If the majority of a study area is deemed not to warrant a Stage 2 property investigation, the Stage 1 background study must present a thorough and justified evaluation of archaeological potential. This Stage 1 assessment does not provide such confidence.

1. Prior to the Stage 2 property investigation it is crucial that the study area – specifically the municipal right-of-way, be re-examined by Stantec and the Saugeen Ojibway Nation Environmental Office to identify areas that may be undisturbed, contain peri- and post-glacial lakeshore features, or may have buried paleosols. These areas must then be added to areas already proposed for Stage 2 assessment.

2. For a better appreciation of the 1840s' and early-1850s' Indigenous and Euro-Canadian presence in the study area, the field notes, diaries, and reports of all relevant provincial land surveyors should be examined for locations of cultural activity that may have been encountered within the proposed townplots and along the proposed concession and side road grid system through which the pipeline corridor runs.

From: [Ritchie, Paul](#)
To: [William Fitzgerald](#); "[Zumbado, Andres](#)"
Cc: [Muir, Jeff](#); "[Doran Ritchie](#)"; "[Laycock, Andrew](#)"; [Georgopoulos, Rooly](#); [Hartwig, Emily](#)
Subject: Re: EPCOR Stage 1 Property Inspection Dates
Date: Sunday, November 18, 2018 4:24:52 PM

Hi Bill,

Yes, as you mention, areas to be recommended for Stage 2 do not strictly need photo-documentation. Stantec has on-file photography of any areas which we plan to recommend as no/low potential under ideal weather conditions. As the main purpose of this field visit is to take a look at the areas where you have identified concern for archaeological potential being retained within the municipal ROW, if you are confident that we have adequate visibility of these areas then I would say let's proceed with this week.

Based on the forecast that I am seeing at the moment we can hopefully get through the study area by thursday without any additional snowfall.

I'll say then, yes, let's plan to go this week.

Thank you, Bill, for providing the weather intel on the weekend.

Sincerely,

PDR

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From: William Fitzgerald <dr_dig@xplornet.com>
Sent: Sunday, November 18, 2018 1:57 PM
To: 'Zumbado, Andres'; Ritchie, Paul
Cc: Muir, Jeff; 'Doran Ritchie'; 'Laycock, Andrew'; Georgopoulos, Rooly; Hartwig, Emily
Subject: RE: EPCOR Stage 1 Property Inspection Dates

I'll leave that call up to Paul but for what would be good to see could be seen despite the snow – it hasn't drifted to obscure contours, it just coats. Worst case here is that more areas would be recommended for Stage 2 (the Ministry wouldn't have an issue with that if you didn't); however, if areas were eliminated from your Stage 1 recommended Stage 2 areas they might if not supported by snow-less photos. Hope that has passed the buck adequately!

Bill

From: Zumbado, Andres [mailto:AZumbado@epcor.com]
Sent: November-18-18 1:38 PM
To: William Fitzgerald; 'Ritchie, Paul'
Cc: 'Muir, Jeff'; 'Doran Ritchie'; Laycock, Andrew; 'Georgopoulos, Rooly'; 'Hartwig, Emily'
Subject: RE: EPCOR Stage 1 Property Inspection Dates

Thanks for the picture Bill. So in your opinion we can still go ahead with the field visit regardless of the present conditions?

Regards,

Andrés

From: William Fitzgerald [mailto:dr_dig@xplornet.com]
Sent: November-18-18 10:18 AM
To: 'Ritchie, Paul'
Cc: 'Muir, Jeff'; 'Doran Ritchie'; Laycock, Andrew; 'Georgopoulos, Rooly'; 'Hartwig, Emily'; Zumbado, Andres
Subject: RE: EPCOR Stage 1 Property Inspection Dates

Notice: External Email

Use caution when opening links, attachments, and when prompted to enter User IDs, Passwords or Confidential Information.

Please report any suspicious email to the EPCOR Service Desk.

Here you go at noon Sunday next door to the Shiloh church on Bruce Road 20. Periods of snow and below freezing for much of week. Tis the season to do archaeology!

From: Ritchie, Paul [mailto:Paul.Ritchie@stantec.com]
Sent: November-17-18 5:05 PM
To: William Fitzgerald
Cc: Muir, Jeff; 'Doran Ritchie'; 'Laycock, Andrew'; Georgopoulos, Rooly; Hartwig, Emily; 'Zumbado, Andres'
Subject: Re: EPCOR Stage 1 Property Inspection Dates

Okay, Bill.

If you don't mind giving a shout tomorrow with how things look on the ground out your way then that will help make the final decision; Andres will be flying in from out west Monday so he'll need to know Sunday to cancel flights if necessary.

Sincerely,

PDR

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From: William Fitzgerald <dr_dig@xplornet.com>

Sent: Friday, November 16, 2018 10:07 PM

To: Ritchie, Paul

Cc: Muir, Jeff; 'Doran Ritchie'; 'Laycock, Andrew'; Georgopoulos, Rooly; Hartwig, Emily; 'Zumbado, Andres'

Subject: RE: EPCOR Stage 1 Property Inspection Dates

Hello Paul,

Who knows what the weather will be like from one moment to the next. It's milder now but there's still snow on the ground. How about meeting at one end or the other? Whatever you decide – date and place, works for me. Maybe one big vehicle would work best so we're not jumping in and out to chat.

Bill

From: Ritchie, Paul [mailto:Paul.Ritchie@stantec.com]

Sent: November-16-18 12:26 PM

To: William Fitzgerald

Cc: Muir, Jeff; 'Doran Ritchie'; 'Laycock, Andrew'; Georgopoulos, Rooly; Hartwig, Emily; Zumbado, Andres

Subject: RE: EPCOR Stage 1 Property Inspection Dates

Hi Bill,

Just taking another look at the forecast today which has changed a fair bit from yesterday. Looks like rain has been replaced by snow across the board however the weekend after next looks to be above average temperatures so that may get us melt for Nov 27-29. Let me know your thoughts if we may still have

acceptable conditions this coming week or if things currently look like it has to be 27-29; I just want to ensure that we're out there when field conditions are acceptable.

Also, re: logistics, would it work well for you to rendezvous in Kincardine or elsewhere? Looking at travel distances we can likely get out there for 11ish. Let me know if you have any concerns with that schedule. Would carpooling work well for you? I believe we discussed at the meeting last week that it would be yourself plus one or two liaisons from the SON Environment Office, is that still the plan? The Stantec-EPCOR team will have a large vehicle with us but if we can confirm numbers that will help us to be organized.

Thanks, Bill.

Sincerely,

Paul David Ritchie MA

Project Archaeologist

Direct: 905-415-6417

Mobile: 647-632-1435

paul.ritchie@stantec.com

Stantec



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From: William Fitzgerald <dr_dig@xplornet.com>

Sent: Friday, November 16, 2018 9:51 AM

To: Ritchie, Paul <Paul.Ritchie@stantec.com>

Cc: Muir, Jeff <Jeff.Muir@stantec.com>; 'Doran Ritchie' <d.ritchie@saugeenobjibwaynation.ca>; 'Laycock, Andrew' <ALaycock@epcor.com>; Georgopoulos, Rooly <Rooly.Georgopoulos@stantec.com>; Hartwig, Emily <Emily.Hartwig@stantec.com>

Subject: RE: EPCOR Stage 1 Property Inspection Dates

Hello Paul,

No rain, more snow. I'll keep you updated.

Bill

From: Ritchie, Paul [<mailto:Paul.Ritchie@stantec.com>]

Sent: November-15-18 12:15 PM

To: William Fitzgerald

Cc: Muir, Jeff; 'Doran Ritchie'; 'Laycock, Andrew'; Georgopoulos, Rooly; Hartwig, Emily

Subject: RE: EPCOR Stage 1 Property Inspection Dates

Thank you for the prompt reply, Bill.

I am now available for November 20-22 so shall we plan for those dates? Looking at the forecast there should be a decent amount of rain tomorrow with a low above zero so here's hoping that melts any cover now on the ground and not add to it. The representative from EPCOR will be travelling into Ontario from Alberta. Would you be willing to confirm over the weekend if the weather has gone favourably for us just to confirm for their travel? Just a quick email would be perfect.

Re: snow cover obscuring visibility, I am inclined to agree with your instincts on this but the MTCS is quite strict about visibility in photographs; nevertheless, we will do our best.

Let's plan for Nov 20-22 for the inspection and if the weather disappoints us we can go with Nov 27-29 as a Plan B.

Let me know if you agree with the above and if you have any questions or concerns at all you can contact me anytime.

Sincerely,

Paul David Ritchie MA

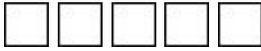
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From: William Fitzgerald <dr_dig@xplornet.com>
Sent: Thursday, November 15, 2018 11:01 AM
To: Ritchie, Paul <Paul.Ritchie@stantec.com>
Cc: Muir, Jeff <Jeff.Muir@stantec.com>; 'Doran Ritchie' <d.ritchie@saugeenojibwaynation.ca>; 'Laycock, Andrew' <ALaycock@epcor.com>; Georgopoulos, Rooly <Rooly.Georgopoulos@stantec.com>; Hartwig, Emily <Emily.Hartwig@stantec.com>
Subject: RE: EPCOR Stage 1 Property Inspection Dates

Hello Paul (and all),

Any of those dates work for me. Currently the ground is snow-covered; however, not so much that it obscures evaluating arch potential. Let's hope for no further dumps!

Bill

From: Ritchie, Paul [<mailto:Paul.Ritchie@stantec.com>]
Sent: November-15-18 10:10 AM
To: dr_dig@xplornet.com
Cc: Muir, Jeff; Doran Ritchie; Laycock, Andrew; Georgopoulos, Rooly; Hartwig, Emily
Subject: EPCOR Stage 1 Property Inspection Dates

Good morning, Bill.

Thank you again for travelling to meet with us last week as well as your feedback on the Stage 1 archaeological assessment report. With regards to completing the additional Stage 1 property inspection for this project, the following dates have been suggested by EPCOR based on their and AECON's availability:

November 20-22 and November 27-29.

At present I am only available on November 27-29. Are you available during this window?

What is your availability November 20-22? I am working to free myself up for that window but that may not pan out, however if you could advise on your availability for that window that would be helpful to know.

Also, how is the weather up in Bruce County? I have heard that there has been some snow over the past few days. The long term forecast is calling for above zero temperatures for the rest of the month but I will trust your first-hand knowledge over the Weather Network...

If you could copy everyone on the cc list on your reply that would be very much appreciated.

Thanks, Bill.

Sincerely,

Paul David Ritchie MA

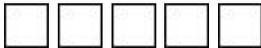
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From: [William Fitzgerald](#)
To: ["Doran Ritchie"](#)
Cc: [Muir, Jeff](#); ["Laycock, Andrew"](#); [Georgopoulos, Rooly](#); [Hartwig, Emily](#); [Ritchie, Paul](#); ["Zumbado, Andres"](#)
Subject: EPCOR Stage 1 Archaeology Inspection
Date: Wednesday, November 21, 2018 10:05:39 PM

Hello Doran,

Yesterday and today (November 20 and 21), sections of EPCOR's Southern Bruce natural gas pipeline corridor between Dornoch and Lucknow that I initially had archaeological concerns with were examined. Involved were Paul Ritchie and Matt Seguin (Stantec's archaeologists), Andres Zumbado (EPCOR engineer), Brent (sorry can't recall his last name)(EPCOR? route planner/installer), and myself.

Clarification of the placement of the main pipeline within the ROW and the means of installation eliminated many of my initial concerns about impacts on potential cultural heritage resources. Remaining areas of concern were visited and Stage 2 assessment strategies were discussed. Paul, Matt, and myself concurred on how to proceed, including situations where Ministry standards would be inadequate (eg., potentially stratified deposits along the base of the Nipissing Great Lakes bluff in the Point Clark area – methodologies proposed and implemented at Inverhuron and the Saugeen river mouth would be appropriate).

For Ministry "approval", Paul will be compiling what areas will be subjected to Stage 2 assessment and the methods to be implemented. Field work is planned for next spring and I informed the group that you will be discussing with them the involvement of members of SON's experienced field team.

We're all on the same archaeological page for the main pipeline, so if we all survive the winter the Stage 2 component should proceed efficiently. To be discussed at a future date would be the need/requirement to conduct Stage 2 assessments of connections to customers from the main pipeline.

There is one matter of concern (not of EPCOR's or Stantec's doing) that you might want to pursue. The County of Bruce has installed the new McCurdy Bridge across the Saugeen south of Paisley and excavated its access roads. That was an area of very high archaeological potential that was slated to be Stage 2'd by Stantec. Neither Stantec or EPCOR were aware of this development. Could you contact the County to see if a Stage 2 assessment had been done? (I did the Stage 1 background a number of years ago for their bridges project).

That's all,

Bill

STAGE 1 ARCHAEOLOGICAL ASSESSMENT: PROPOSED NATURAL GAS PIPELINES TO SERVE SOUTHERN BRUCE

References
January 14, 2019

2.0 REFERENCES

Government of Ontario. 2011. *Engaging Aboriginal Communities in Archaeology*. Draft Technical Bulletin. Toronto: Queen's Printer for Ontario.