

WEBEQUIE SUPPLY ROAD FINAL ENVIRONMENTAL ASSESSMENT REPORT / IMPACT STATEMENT

January 30, 2026

AtkinsRéalis Ref: 661910

SECTION 20:

Assessment of Effects on
Cultural Heritage and
Archaeological Resources



WEBEQUIE FIRST NATION

AtkinsRéalis



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Disclaimer

Due to potential sensitivity and confidentiality of some features referred to in this Section 20 of the EAR/IS, mapping or locations of such features have been redacted.



20 Assessment of Effects on Cultural Heritage Resources

The Cultural Heritage Resources valued component (VC) was identified during the VC scoping and selection process as part of the Environmental Assessment / Impact Assessment (EA/IA) process. This section describes and assesses the potential effects that the Project may have on the Cultural Heritage Resources VC. Potential effects that the Project may have on other aspects of the cultural environment, from the perspective of the Webequie First Nation and other Indigenous communities, including Aboriginal and Treaty Rights and interests, land resource uses, such as hunting, gathering, fishing and trapping, and socio-cultural character of remote communities (i.e., language, traditions, etc.) are assessed in Section 19 of this EAR/IS (Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and/or Treaty Rights).

Existing conditions for the Cultural Heritage Resources VC have been established through desktop studies and engagement and consultation activities completed by the Project Team. This includes, but is not limited to, a review of literature, internet research, consultation and engagement with Indigenous communities and stakeholders, and expert opinion. The existing conditions are being used as baseline conditions to assess and determine the potential effects of the Project. The results of the baseline studies are provided in Appendix S – Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment and Appendix T – Stage 1 Archaeological Assessment Report prepared by Archaeological Services Inc. (ASI).

The assessment of potential effects for the Cultural Heritage Resources VC is presented in the following manner:

- Scope of the Assessment;
- Existing Conditions Summary;
- Potential Effects, Pathways and Indicators;
- Mitigation and Enhancement Measures;
- Characterization of Net Effects;
- Determination of Significance;
- Cumulative Effects;
- Prediction of Confidence in the Assessment;
- Predicted future Condition of the Environment if the Project Does Not Proceed;
- Follow-up and Monitoring Programs; and
- References.



20.1 Scope of the Assessment

20.1.1 Regulatory and Policy Setting

The Cultural Heritage Resources VC was assessed in accordance with the requirements of the *Impact Assessment Act* (IAA), the Ontario *Environmental Assessment Act*, the *Ontario Heritage Act* (OHA), the Standards and Guidelines for Conservation of Provincial Heritage Properties (issued under Section 25.2 of OHA), the Ministry of Citizenship and Multiculturalism’s (MCM) 2011 Standards and Guidelines for Consultant Archaeologists, the Tailored Impact Statement Guidelines (TISG) for the Project (Appendix A-1), the provincially approved EA Terms of Reference (Appendix A-2), and EA/IA guidance documents.

Table 20-1 outlines the key regulations, legislation and policies relevant to the assessment of the Cultural Heritage Resources VC for construction and operations of the Project.

Table 20-1: Key Regulation, Legislation, Policy Relevant to Cultural Heritage Resources

Regulatory Agency	Regulation, Legislation, or Policy	Project Relevance
Federal		
Impact Assessment Agency of Canada (IAAC)	<i>Impact Assessment Act</i> (IAA)	The Project is subject to the federal <i>Impact Assessment Act</i> (refer to Section 1). The Tailored Impact Statement Guidelines (TISG) issued by IAAC (2020) for the Project were used to identify requirements for the assessment of the Cultural Heritage Resources VC.
IAAC	Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing (IAAC, 2015)	This document provides guidance on the assessment of the effects of any changes to the environment on physical and cultural heritage or on any structure, site or thing that is of historical, archaeological, paleontological or architectural significance when the Canadian Environmental Assessment Agency (now the Impact Assessment Agency of Canada [IAAC]) is the responsible authority. This technical guidance informed the TISG issued by IAAC (2020) for the Project.
Provincial		
Ministry of the Environment, Conservation and Parks (MECP)	Ontario <i>Environmental Assessment Act</i>	The Project is subject to the Ontario <i>Environmental Assessment Act</i> . The ToR (Webequie First Nation, 2020), which was approved by the MECP on October 8, 2021, were used to identify requirements for the assessment of Cultural Heritage Resources VC.
MECP	Ontario <i>Environmental Assessment Act</i>	The Act defines “environment” to include cultural conditions that influence the life of humans or a community. Cultural heritage resources, which includes archaeological resources, Built Heritage Resources (BHRs) and Cultural Heritage Landscapes (CHLs), are important components of those cultural conditions.
Ministry of Citizenship and Multiculturalism (MCM) (formerly Ministry of Tourism and Culture [MTC], Ministry of Tourism, Culture and Sport [MTCS])	<i>Ontario Heritage Act</i> (OHA) (as amended 2023)	MCM is charged under Section 2.0 of the OHA with the responsibility to determine policies, priorities, and programs for the conservation, protection, and preservation of the heritage of Ontario. In Ontario, archaeology is regulated by MCM under the OHA. Archaeology in Ontario can only be conducted by archaeologists licensed by MCM under the OHA.



Regulatory Agency	Regulation, Legislation, or Policy	Project Relevance
MCM	Standards and Guidelines for Consultant Archaeologists (MCM, 2011a)	The Standards and Guidelines for Consultant Archaeologists outline the requirements and methodology for archaeological field work and reporting.
MCM	Engaging Aboriginal Communities in Archaeology (MCM, 2011b)	This draft bulletin outlines the requirements for engaging with Indigenous communities with regards to archaeological investigations.
MCM	<i>Standards and Guidelines for Conservation of Provincial Heritage Properties</i> (issued under section 25.2 of OHA) (MCM, 2010)	As the Webequie Supply Road study area consists largely of provincial Crown land, Part III.1 Standards and Guidelines for Provincial Heritage Properties of the OHA applies. The Standards and Guidelines for Conservation of Provincial Heritage Properties (MCM, 2010) (hereinafter “ <i>Standards and Guidelines</i> ”) apply to properties the Government of Ontario owns or controls that have “cultural heritage value or interest” (CHVI). The <i>Standards and Guidelines</i> provide a series of guidelines that apply to provincial heritage properties in the areas of identification and evaluation; protection; maintenance; use; and disposal. For the purpose of this report, the Standards and Guidelines provide points of reference to aid in determining potential heritage significance in the identification of BHRs and CHLs and are regarded as best practice for guiding heritage assessments and ensure that additional identification and mitigation measures are considered.
MCM	<i>Information Bulletin 3: Heritage Impact Assessments for Provincial Heritage Properties</i> (2017)	The development of transportation infrastructure has the potential to affect BHRs and CHLs in various ways. As the project study areas consists largely of provincial Crown land, potential effects to be considered are outlined in this information bulletin.
Burial Authority of Ontario (BAO)	<i>Funeral, Burial and Cremation Services Act, 2002, (as amended in 2022)</i>	In Ontario all burial investigations are regulated under the <i>Funeral, Burial and Cremation Act</i> .
Ministry of Transportation (MTO)	<i>Environmental Guide for Built Heritage and Cultural Heritage Landscapes</i> (2007)	The document provides guidance on the assessment of potential impacts to BHRs and CHLs through displacement and/or disturbance by a proposed highway design and construction both within and adjacent to the right-of-way (ROW).
Other		
Webequie First Nation	Webequie First Nation On-reserve Land Use Plan	<p>The Webequie First Nation On-reserve Land Use Plan (Webequie First Nation, 2019) provides information and guidance for community land use and development projects. The Plan identifies a number of “Known Culturally Sensitive Areas” within the boundary of the Webequie First Nation Reserve and identifies important cultural areas as:</p> <ul style="list-style-type: none"> ▪ Sites identified as important traditional use, historic, or cultural significant areas through pre-planning input from members, families, and Elders; ▪ Registered and/or known archaeological sites;

Regulatory Agency	Regulation, Legislation, or Policy	Project Relevance
		<ul style="list-style-type: none"> ▪ Sites identified during pre-development site investigations; and ▪ Sites discovered during site construction.

20.1.2 Consideration of Input from Engagement and Consultation Activities

Table 20-2 summarizes input related to Cultural Heritage Resources VC received during the engagement and consultation and how the comments and input are addressed in the EAR/IS. This input includes concerns raised by Indigenous communities and groups, the public, government agencies, and stakeholders prior to the formal commencement of the federal IA and provincial EA, during the Planning Phase of the IA and Terms of Reference phase of the EA. The Project Team considered the comments received on the Draft EAR/IS in finalizing the EAR/IS. Details of responses and how the comments have been addressed are provided in the Record of Engagement and Consultation.

Table 20-2: Cultural Heritage Resources – Summary of Input Received During Engagement and Consultation

Comment Theme	How are the Comments Addressed in this EAR/IS	Indigenous Community or Stakeholder
Concerns regarding consideration of any investigation of and for built heritage resources and cultural heritage landscapes as a separate undertaking to be conducted by a qualified person(s).	A study was conducted by Archaeological Services Inc. (ASI) to characterize existing conditions and assess impacts to built heritage resources and cultural heritage landscapes. Baseline components of this study include review of available Indigenous Knowledge and Land and Resource Use information (refer to Section 20.1.3), provincial and federal heritage inventories and databases, and review of historical documents including local historical records, census records as available, historical mapping, and aerial photographs. Methods and results of the baseline studies and assessment of impacts, in accordance with the requirements MCM <i>Standards and Guidelines</i> , are summarized in Section 20.2 and detailed in Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (Appendix S of this EAR/IS).	MCM
Concerned about a gap in the background information regarding including the Métis presence in the project area.	A description of the Métis presence in the project area is included in the following reports: <ul style="list-style-type: none"> ▪ Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (Appendix S of this EAR/IS); and ▪ Stage 1 Archaeological Assessment Report (Appendix T of this EAR/IS). 	Marten Falls First Nation

Comment Theme	How are the Comments Addressed in this EAR/IS	Indigenous Community or Stakeholder
<p>Question about how the province of Ontario would be involved with cultural Heritage Impact Assessment and managing information on sacred places and burial sites.</p>	<p>The Ministry of Citizenship and Multiculturalism (MCM) is charged under Section 2.0 of the <i>Ontario Heritage Act</i> (OHA) with the responsibility to determine policies, priorities, and programs for the conservation, protection, and preservation of the heritage of Ontario. As the project study areas consist largely of provincial Crown land, Part III.1 Standards and Guidelines for Provincial Heritage Properties of the OHA applies.</p> <p>The <i>Funeral, Burials and Cremation Services Act</i> addresses the need to protect human burials, both marked and unmarked. Burial locations uncovered on archaeological sites constitute “burial grounds”. The discovery of such burials requires further archaeological investigation in order to define the extent and number of interments, and either the registration of the burial location as a cemetery, or the removal of the remains for re-interment in an established cemetery. The actual workings of this process are complex and vary depending on the nature of the burial(s) (e.g., isolated occurrence or part of a more formal cemetery) and on the cultural affiliation of the remains. In all cases, the success of the process is dependent upon the co-operation of the property owner (the province in the case of Crown land), the next of kin (whether biological or prescribed), and the Registrar of Burial Sites in the Ministry of Public and Business Service Delivery. The role of the Ministry is to assist in co-ordinating contact and negotiation between the various parties and ensuring that burial site investigations by licensed archaeologists meet provincial policies, standards, and guidelines.</p>	<p>Neskantaga First Nation</p>
<p>Concerned about impacts to Cultural Heritage Resources of Indigenous groups, such as burial sites and locations used for the purpose of teaching.</p> <p>Commented on negative consequences to Indigenous ways of life, knowledge and language due to the Project.</p> <p>Commented the need to engage Indigenous groups to identify what is culturally important to them and understand potential project induced changes.</p>	<p>This section (Section 20) of the EAR/IS includes an assessment of potential effects of the Project on Cultural Heritage Resources. Section 20.4 outlines proposed mitigation measures to avoid impacts to these resources.</p> <p>Potential effects that the Project may have on other aspects of the cultural environment, from the perspective of Indigenous communities, including Aboriginal and Treaty Rights and interests, land resource uses, such as hunting, gathering, fishing and trapping, and socio-cultural character of remote communities (i.e., language, traditions, etc.) are assessed in Section 19 of this EAR/IS (Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and/or Treaty Rights).</p>	<ul style="list-style-type: none"> ▪ Aroland First Nation; ▪ Eabametoong First Nation; ▪ Fort Albany First Nation; ▪ Friends of the Attawapiskat River; ▪ Ginoogaming First Nation; ▪ Kasabonika Lake First Nation; ▪ Marten Falls First Nation; ▪ Neskantaga First Nation; ▪ Nibinamik First Nation; ▪ Webequie First Nation; and ▪ Wildlife Conservation Society Canada.

Comment Theme	How are the Comments Addressed in this EAR/IS	Indigenous Community or Stakeholder
Concerned that the proponent should conduct a Cultural Impact Assessment co-created between the community and relevant experts or advisors.	<p>The Project Team including relevant experts or advisors has conducted assessments of potential effects that the Project may have on the various aspects of cultural environment, as presented in the following sections of the EAR/IS:</p> <ul style="list-style-type: none"> ▪ Section 19 – Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and/or Treaty Rights; and ▪ Section 20 – Assessment of Effects on Cultural Heritage Resources <p>These assessments have incorporated the Indigenous Knowledge and Land and Resource Use Information received from the following First Nations:</p> <ul style="list-style-type: none"> ▪ Webequie First Nation; ▪ Marten Falls First Nation; ▪ Weenusk First Nation; ▪ Kashechewan First Nation; and ▪ Fort Albany First Nation. 	Wildlife Conservation Society Canada

20.1.3 Incorporation of Indigenous Knowledge and Land and Resource Use Information

To date, the following First Nations have provided Indigenous Knowledge and Land and Resource Use (IKLRU) information to the Project Team:

- Webequie First Nation;
- Marten Falls First Nation;
- Weenusk First Nation;
- Kashechewan First Nation; and
- Fort Albany First Nation.

Table 20-3 summarizes IKLRU information relating to Cultural Heritage Resources VC and indicates where the information is incorporated in the EAR/IS.

Table 20-3: Cultural Heritage Resources VC – Summary of Indigenous Knowledge and Land and Resource Use Information

Common Theme	Key Information and Concerns	Response and/or Relevant EAR/IS Section
Location of culturally significant sites	<p>Information Shared</p> <ul style="list-style-type: none"> ▪ The Webequie First Nation’s Draft Community Based Land Use Plan describes land use zoning areas which have cultural heritage resources, culturally significant sites or sensitivities, some of which overlap with the Local Study Area described in Section 20.1.5.1. 	<p>Information on culturally significant sites was used to characterize the existing conditions and assess potential effects of the Project on valued components (VCs) identified for the EA/IA, including:</p> <ul style="list-style-type: none"> ▪ Surface Water Resources (Section 7)

Common Theme	Key Information and Concerns	Response and/or Relevant EAR/IS Section
	<ul style="list-style-type: none"> ▪ The Webequie First Nation On-reserve Land Use Plan provides information and guidance for community land use and development projects. The Plan identifies a number of “Known Culturally Sensitive Areas” within the boundary of the Webequie First Nation Reserve. ▪ The Webequie First Nation Indigenous Knowledge Study for the Webequie Supply Road (the <i>IK Study</i>): Interim Report presents Webequie First Nation’s knowledge about activities, practices, places, and areas, related to use of traditional resources (Traditional Land and Resource Use), knowledge about the natural environment, accumulated over generations of living on the land (Traditional Ecological Knowledge), and socio-economic information, in relation to the Project. The report presents through text and mapping areas of importance to the study participants, including harvesting areas, cultural sites, areas recommended for protection and more. Types of features that are of significance to Webequie First Nation, which may or may not have tangible remains on the landscape, include, but are not limited to the following: <ul style="list-style-type: none"> ▫ Water: considered a sacred element with deep spiritual and cultural significance, whether through consumption, honoured in ceremony, or used as transportation: <ul style="list-style-type: none"> - Areas where rivers or waterbodies are present are seen as highly spiritually important areas. ▫ Harvesting sites associated with hunting, trapping, fishing, plant gathering, and other harvesting. ▫ Travel and Access: waterways hold historical and current importance to Webequie First Nation as, historically, they were a primary means of transportation and communication. Indigenous communities remain deeply connected with traditionally used waterways for social, economic and cultural purposes: <ul style="list-style-type: none"> - Stars were used to navigate the landscape while travelling; and - Otter trails were used to navigate the landscape and find their way if they became lost. ▫ Habitation: includes hunting and trapping cabins, campsites and historic camping areas: 	<ul style="list-style-type: none"> ▪ Atmospheric Environment (Section 9) ▪ Fish and Fish Habitat (Section 10) ▪ Vegetation and Wetlands (Section 11) ▪ Wildlife and Wildlife Habitat (Section 12) ▪ Species at Risk (Section 13) ▪ Human Health (Section 17) ▪ Visual Environment (Section 18) ▪ Aboriginal and Treaty Rights and Interests (Section 19) ▪ Cultural Heritage Resources (Section 20) <p>Proposed mitigation measures to eliminate or reduce potential effects of the Project are outlined in respective VC-specific sections and Appendix E of this EAR/IS.</p>

Common Theme	Key Information and Concerns	Response and/or Relevant EAR/IS Section
	<ul style="list-style-type: none"> - The location of the present-day community on the north end of Eastwood Island was originally a summer gathering site for family groups that occupied and utilized the broad surrounding area throughout the year. ▫ Cultural, Spiritual, and Ceremonial Sites or Areas: includes historic village sites, occupation sites, burial sites, cultural monuments, and spiritually significant natural areas. They also include traditional meeting sites and named places. ▫ Cultural Values and Cultural Experience. ▪ The Marten Falls First Nation Indigenous Knowledge, Land Use and Occupancy Study for the Northern Access Roads – Proposed Webequie Supply Road Project (2024) identifies a number of points of interest within a 50 km buffer zone of the proposed Webequie Supply Road (WSR) route, one of which was identified within the Local Study Area (LSA) at the eastern-most end of the project study areas (a historical trail). ▪ The Draft Weenusk First Nation Existing Conditions Report: Webequie Supply Road Project (n.d.) identifies that Weenusk First Nation caribou hunting and pickerel and walleye fishing areas extend south into Winisk River Provincial Park and part of the Webequie First Nation reserve. Transportation uses also extend south in a similar manner. Other harvesting areas, such as trapping, berries and plants, and other sites of significance, such as medicine gathering sites, important sites, burial sites, and family territory are located north of the Webequie Supply Road Local and Regional Study Areas as they are defined in the Cultural Heritage Report. ▪ The Kashechewan First Nation Existing Conditions Report: Webequie Supply Road (n.d.) identifies migration, subsistence and transportation routes to the south and east of the RSA. Hunting, fishing, trapping areas and harvesting areas for berries and plants, and medicine gathering sites are also located east and south of the WSR’s LSAs and RSAs. ▪ Kashechewan First Nation identified burial, archaeological, ceremonial, cultural and camping sites along Kistachowan Sipi (Albany River). 	



Common Theme	Key Information and Concerns	Response and/or Relevant EAR/IS Section
	<p>Concerns:</p> <ul style="list-style-type: none"> ▪ The entire landscape setting within which the proposed road is located is of significance to Webequie First Nation. The Webequie First Nation Indigenous Knowledge Study for the Webequie Supply Road: Interim Report states: “Study participants stated that “everywhere” surrounding the Webequie reserve and the proposed route for the Webequie Supply Road was important to them and their families for traditional land and resource use. The community’s hunting, trapping, fishing and habitation areas are tied to specific family groups and clans. These lands were passed down from generation to generation through paternal lines”. ▪ It should be noted that the location of some sacred areas within the community’s territory cannot be shared with outsiders and, as such, the inventory and mapping of cultural heritage resources is representative and not exhaustive. 	
Impacts to oral history	In regard to potential impacts to oral history and culture, Marten Falls First Nation members have identified that blasting techniques used to break up rock formations as part of road construction or related development might negatively impact the homes of the <i>Ma-ma-kwa-se-sak</i> . In Marten Falls First Nation oral history and culture, the <i>Ma-ma-kwa-se-sak</i> are little people who live in the rocks. Similar concerns were shared by Webequie First Nation.	Potential effects of blasting of rocks on traditional land and resource use are assessed in the Section 19 of this EAR/IS (Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and/or Treaty Rights).
Archaeological Sites	While there were no specific concerns regarding known or potential archaeological sites within the LSA, the concerns raised regarding the above culturally significant sites would also apply to archaeological sites. This is due to the high potential for archaeological sites associated with culturally significant locations that have been used for many generations.	Refer to the responses for information shared and concerns on “Location of culturally significant sites” above.
Aggregate Source Areas	<p>Aggregate Resource Area 4 (ARA-4) is located in an area identified by Webequie First Nation as an important plant harvesting and spring water collection area. This area is also identified as a culturally sensitive area.</p> <p>Aggregate resource areas are considered to have archaeological potential due to their association with eskers, which represent high points of land associated with hunting lookouts and also animal, most notably caribou migration.</p>	Section 19 of this EAR/IS (Assessment of Effects on Indigenous Peoples and Impacts to the Exercise of Aboriginal and/or Treaty Rights) assesses potential effects of the Project including aggregate sources areas on traditional land and resource use. Proposed mitigation measures to eliminate or reduce those potential effects are also outlined in Section 19.

Note: Names of First Nations and associated location-specific description in some instances are not presented in this table due to potential sensitivity and confidentiality of IKLRU information.

20.1.4 Valued Component and Indicators

Valued components, including Cultural Heritage Resources, have been identified in the TISG and by the Project Team and are, in part, based on what Indigenous communities and groups, the public, government agencies, and stakeholders have identified as valuable to them in the EA/IA process to date. Subcomponents (or criteria) of the Cultural Heritage Resources VC are further identified to help inform the report structure and better assess and present the data and assessment results. The assessment of these subcomponents is conducted using the methodology as outlined in Section 5 (Environmental Assessment / Impact Assessment Approach and Methods) and the IAAC’s Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing (IAAC, 2015). The identified subcomponents for Cultural Heritage Resources VC are:

- Built heritage resources;
- Cultural heritage landscapes; and
- Archaeological resources.

A built heritage resource is defined as “a building, structure, monument, installation or any manufactured or constructed part or remnant that contributes to a property’s cultural heritage value or interest as identified by a community, including an Indigenous community” (Ministry of Municipal Affairs and Housing, 2024, p. 40).

A cultural heritage landscape means “a defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an Indigenous community. The area may include features such as buildings, structures, spaces, views, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association” (Ministry of Municipal Affairs and Housing, 2024, p. 41).

Archaeological resources are the material evidence of human culture and activity in the past. They include “artifacts, archaeological sites and marine archaeological sites, as defined under the OHA. The identification and evaluation of such resources are based upon archaeological assessments carried out by archaeologists licensed under the OHA” (Ministry of Municipal Affairs and Housing, 2024, p. 40).

"Indicators", are used to assess potential effects to a VC. In general, indicators represent a resource, feature or issue related to a VC that if changed from the existing conditions may demonstrate a positive or negative effect.

Table 20-4 shows the subcomponents and indicators identified for the Cultural Heritage Resources VC.

Table 20-4: Cultural Heritage Resources VC – Subcomponents, Indicators, and Rationale

Subcomponent(s)	Indicators	Rationale
Built heritage resources (BHRs)	<ul style="list-style-type: none"> ▪ Number and type of Indigenous or non-Indigenous BHRs that may be impacted (e.g., old trapping or hunting camps, etc.) and/or CHLs that may be impacted (e.g., spiritual or symbolic sites of value or interest to Indigenous communities). 	<ul style="list-style-type: none"> ▪ BHRs and CHLs are a non-renewable resource that could be affected by project activities. ▪ BHRs and CHLs, including those that may have spiritual and symbolic meaning for Canadians and Indigenous communities.
Cultural heritage landscapes (CHLs)	<ul style="list-style-type: none"> ▪ Number of Provincial heritage properties affected. ▪ Changes to sites or things of historical or cultural significance, oral histories, cultural values and experiences of being on the land. 	<ul style="list-style-type: none"> ▪ The <i>Ontario Heritage Act</i> (OHA) is the primary piece of legislation that determines policies, priorities and programs for the conservation of Ontario's heritage.

Subcomponent(s)	Indicators	Rationale
Archaeological resources	<ul style="list-style-type: none"> ▪ Number and/or area (ha) of archaeological potential affected. ▪ Number and/or area (ha) of archaeological sites associated with Indigenous communities affected. ▪ Number or area (ha) of Euro-Canadian archaeological sites affected. ▪ Number/area(ha)/type of burial sites affected. 	<ul style="list-style-type: none"> ▪ Archaeological remains or artifacts are a non-renewable resource that could be affected by project activities. ▪ Archaeological sites are protected under the OHA. ▪ Cultural and spiritual importance to Indigenous communities. ▪ Burial sites are afforded protection under the Ontario <i>Funeral, Burial and Cremation Services Act</i>.

20.1.5 Spatial and Temporal Boundaries

The following assessment boundaries have been defined for the Cultural Heritage Resources VC.

20.1.5.1 Spatial Boundaries

The spatial boundaries for the Cultural Heritage Resources VC are shown on **Figure 20.1** and include the following:

- **Project Footprint** – the area of direct disturbance (i.e., the physical area required for project construction and operations). The PF is defined as the 35 m wide right-of-way (ROW) of the Webequie Supply Road (WSR); and temporary and permanent areas needed to support the Project that include access roads, construction camps, laydown and storage yards, aggregate pits/quarries, and a Maintenance and Storage Facility (MSF).
- **Local Study Area (LSA)** – the area where potential largely direct, and indirect effects of the Project are likely to occur and can be predicted or measured for assessment. The LSA extends approximately 1 km from the centreline of the preliminary recommended preferred route and 500 m from the boundary of the temporary or permanent supportive infrastructure.
- **Regional Study Area (RSA)** – the area where potential largely indirect and cumulative effects of the Project in the broader, regional context may occur. The RSA includes the LSA and extends 5 km from the boundary of the LSA.

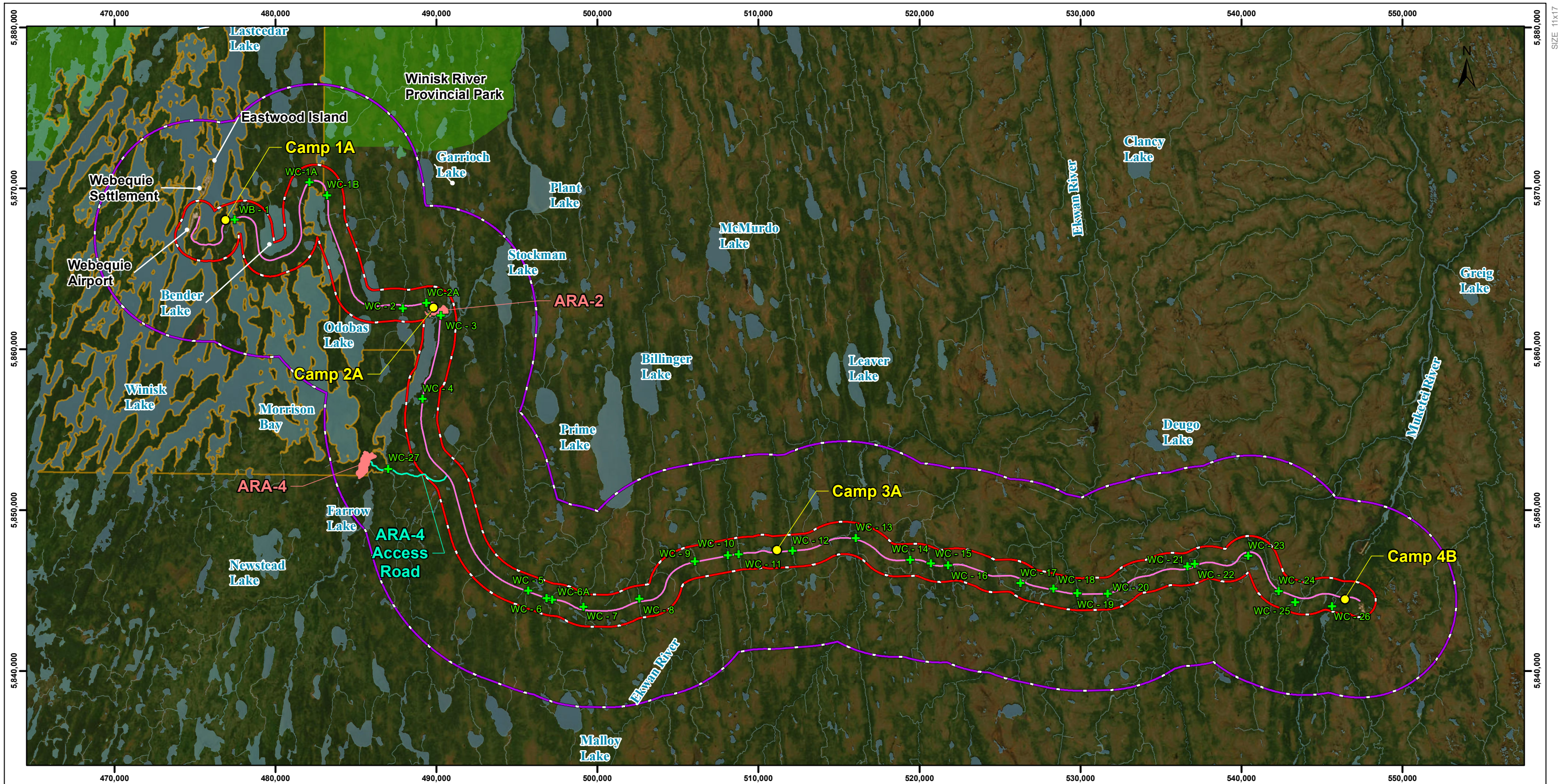
20.1.5.2 Temporal Boundaries

Temporal boundaries for the assessment address the potential effects of the Project over relevant timescales. The temporal boundaries for the Project consist of two main phases:

- **Construction Phase:** All activities associated with the initial development and construction of the road and supportive infrastructure from the start of the construction to the start of the operation and maintenance of the Project and is estimated to be approximately 5 to 6 years in duration.
- **Operation Phase:** All activities associated with operation and maintenance of the road and permanent supportive infrastructure (e.g., operations and maintenance yard, aggregate extraction, and processing areas) that will start after construction activities are complete, including site restoration and decommissioning of temporary infrastructure (e.g., construction camps). The Operations Phase of the Project is anticipated to be 75 years based on the expected timeline for when major refurbishment of road components (e.g., bridges) is deemed necessary.

The Project is proposed to be operated for an indeterminate period; therefore, future suspension, decommissioning and eventual abandonment is not evaluated in the EA/IA (refer to Project Description, Section 4.4).





Legend

- Preliminary Recommended Preferred Route
- Local Study Area (LSA 1km from the Preferred Route)
- Regional Study Area (RSA 5km from either side of LSA Boundary)
- Webeque First Nation Reserve
- Winisk River Provincial Park
- Waterbody
- Watercourse
- ARA-4 Access Road
- Recommended Aggregate/Rock Source Areas
- Recommended Construction Camps
*Camp 2-A is proposed to include permanent Maintenance and Storage Facility (MSF) for operations of the WSR.
- + Waterbody Crossing



NOTES

1. Coordinate System: NAD 1983 UTM Zone 16N.
2. Cadastral boundaries are for informational purposes only and should not be considered suitable for legal, engineering, or surveying purposes.
3. Topographic/landcover features obtained from CanVec v12.0 dataset, Natural Resources Canada Earth and Sciences Sector Centre for Topographic Information; and, Land Information Ontario (LIO) Warehouse Open Data (<https://github.io/gov.on.ca/>), Ontario Ministry of Natural Resources and Forestry (OMNRF). Download Date - 2021-02-04

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Webeque Supply Road (WSR)

Cultural Heritage and Archaeological Resources Study Areas

Figure Number: 20.1		REV: PA	
Client: Webeque First Nation	Project Number: 661910	Date: 12/18/2024	
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20.1.6 Identification of Project Interactions with Cultural Heritage Resources

Table 20-5 identifies the project activities that may interact with the Cultural Heritage Resources VC to result in a potential effect. The identification of project interactions with Cultural Heritage Resources provides a basis for the subsequent assessment of the potential effects of the Project. The potential effects are described separately for subcomponents of the Cultural Heritage Resources VC including BHRs, CHLs, and archaeological resources.

Table 20-5: Project Interactions with Cultural Heritage Resources Valued Component and Potential Effects

Project Activities	Potential Effects		
	Change to Built Heritage Resources	Change to Cultural Heritage Landscapes	Change to Archaeological Resources
Construction			
Mobilization of Equipment and Supplies: Transport of equipment, materials and supplies to the Project site area using the winter road network and airport in Webequie First Nation Reserve.	--	--	--
Surveying: Ground surveys are conducted to stake (physically delineate) the road right-of-way (ROW) and supportive infrastructure components of the Project (i.e., construction camps, access roads, laydown/storage areas, and aggregate extraction and processing areas).	--	--	--
Vegetation Clearing and Grubbing: Clearing and grubbing of vegetation (forest & wetland), including removal, chipping and/or disposal.	✓	✓	✓
Construction and Use of Supportive Infrastructure: This includes temporary construction camps, access roads and watercourse crossings, laydown/storage areas, and aggregate extraction (pits & quarries) and processing areas (screening, crushing), including blasting.	✓	✓	✓
Construction of Road: removal and stockpiling of organics, subgrade excavation, placement of fill and gravel, grading and drainage work (e.g., road ditches, erosion protection, etc.).	✓	✓	✓
Construction of Structures at Waterbody Crossings: Culverts and bridges – foundations (e.g., pile driving and concrete works), bridge girders, bridge decks, install of culverts.	✓	✓	✓
Decommissioning / Closure of Temporary Aggregate Extraction and Processing Areas (pits and quarries): Demobilization of extracting and processing equipment, grading and site reclamation/revegetation. This also includes formalizing / re-purposing select pits and quarries proposed as permanent Project components during operations.	✓	✓	✓



Project Activities	Potential Effects		
	Change to Built Heritage Resources	Change to Cultural Heritage Landscapes	Change to Archaeological Resources
Decommissioning of Temporary Construction Camps, Access Roads and Laydown / Storage Areas: Grading and site reclamation/revegetation. This also includes formalizing / re-purposing select access roads to permanent pits and quarries and a construction camp to an operations and maintenance facility as Project components for use during operations.	✓	✓	✓
Emissions, Discharges and Wastes¹: Noise, air emissions / GHGs, water discharge, and hazardous and non-hazardous wastes.	--	--	✓
Completion of Project-Wide Clean-up, Site Restoration / Reclamation and Demobilization: Clean-up of excess materials, site revegetation and demobilization of equipment and materials.	✓	✓	✓
Potential for Accidents and Malfunctions²: Spills, vehicle collisions, flooding, forest fire and vandalism.	✓	✓	✓
Employment and Expenditures³	--	--	--
Operations			
Road Use: Light and heavy vehicles and maintenance equipment with average annual daily traffic volume of less than 500 vehicles.	--	--	--
Operation, Maintenance and Repair of Road: Includes: vegetation management control within road ROW; repairs/resurfacing of road granular surface and shoulders; dust control; winter/seasonal maintenance (i.e., snow clearing); road drainage system cleanout/repairs to culverts, ditches and drainage outfalls; rehabilitation and repairs to structural culverts and bridges; and road patrols for inspection.	--	--	--
Operation of Pits, Quarries and Maintenance Yard/Facility: Includes periodic extraction and blasting and processing operations (i.e., crushing, screening) and stockpiling of rock and aggregate materials. Also includes operation and repairs of Maintenance Yard/Facility and components within (office buildings, parking, storage of equipment and materials).	✓	✓	✓
Emissions, Discharges and Wastes¹: Noise, air emissions / GHGs, water discharge, and hazardous and non-hazardous wastes.	--	--	--
Potential for Accidents and Malfunctions²: Spills, vehicle collisions, flooding, forest fire and vandalism.	✓	✓	✓
Employment and Expenditures³	--	--	--

Notes:

✓ = Potential interaction

-- = No interaction



Project Activities	Potential Effects		
	Change to Built Heritage Resources	Change to Cultural Heritage Landscapes	Change to Archaeological Resources

- ¹ Emissions, Discharges, and Wastes (e.g., air, noise, light, solid wastes, and liquid effluents) can be generated by many project activities. Rather than acknowledging this by placing a checkmark against each of these activities, “Wastes and Emissions” is an additional component under each project phase.
- ² Accidents and Malfunctions including spills, vehicle collisions, flooding, forest fire and vandalism may occur at any time during construction and operations of the Project. Rather than acknowledging this by placing a checkmark against each of these activities, “Potential for Accidents and Malfunctions” is an additional component under each project phase. The potential effects of accidental spills are assessed in Section 23 – Accidents and Malfunctions.
- ³ Project employment and expenditures are related to most project activities and components, and are the main drivers of many socio-economic effects. Rather than acknowledging this by placing a checkmark against each of these activities, “Employment and Expenditures” is an additional component under each project phase.

20.2 Existing Conditions

This section summarizes existing conditions of the Cultural Heritage Resources VC based on desktop review and engagement and consultation activities conducted for the Project. Detailed descriptions of the methods for desktop review and interpretations of the results are provided in Appendix S – Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment and Appendix T – Stage 1 Archaeological Assessment Report.

20.2.1 Methods

20.2.1.1 Built Heritage Resources and Cultural Heritage Landscapes

To characterize existing conditions of BHRs and CHLs in the project study areas, the Project Team (ASI) conducted the following tasks:

- **Background document review and agency consultation**, including: provincial and federal heritage inventory and database review; review of Webequie First Nation’s Community Based Land Use Plan and previous heritage reporting within the project study areas; and consultation with the Ministry of Citizenship and Multiculturalism, the Ontario Heritage Trust, and Ontario Parks to determine if any previously identified BHRs or CHLs, including those designated under Part IV or Part V of the OHA, and those subject to any federal recognition are located within the project study areas.
- **Background historical research**, including: review of primary and secondary source research and historical mapping, to identify land use and settlement patterns and broad agents or themes of change in the project study areas for determining the presence of sensitive heritage areas that correspond to traditional Indigenous settlement and land use patterns and nineteenth- and twentieth-century Euro-Canadian settlement and development patterns. Historical documents including local historical records, census records, historical mapping, and aerial photographs were consulted, as available, to establish the historical land use, development and settlement history of the project study areas. Background historical document review may aid in the determination of approximate construction dates of structures, transportation features, and other landscape features within the project study areas.



- **Review of Indigenous Knowledge and Land and Resource Use information**, including: review of available traditional knowledge of culturally important sites and areas obtained through the Project's Indigenous Knowledge and Land and Resource Use program. This knowledge is a key information source for identifying CHLs within the project study areas.
 - Indigenous Knowledge and Land and Resource Use information collected for the Project was led by each community (and their selected advisors/consultants/contractors). This includes information gathering, documenting and permission of use, as well as validating. Project Team representatives (i.e., ASI) were in attendance at the validation sessions held in Webequie First Nation to begin discussing the emerging findings of the Cultural Heritage Report based on the desktop research and analysis conducted to date. A focused, in-person validation process with Knowledge Holders at Webequie First Nation is an appropriate alternative to field survey conducted by a heritage consultant for the identification of potential BHRs and CHLs that may be impacted by the proposed undertaking.
- **Preparation of an inventory of known and potential built heritage resources and cultural heritage landscapes within the project study areas** – This task includes compiling the results of the heritage inventory and database review, stakeholder consultation, background historical research, and review of available Indigenous Knowledge and Land and Resource Use information to produce an inventory of known and potential BHRs and CHLs within the project study areas. This inventory includes description of general features and characteristics, as available, and the rationale for identifying such features.
- **Preliminary analysis of potential impacts** – For the purposes of this preliminary analysis of potential impacts to potential BHRs and CHLs, the following is being considered:
 - A 35-metre ROW following the preliminary recommended preferred route which comprises lands to be cleared and developed for the proposed WSR.
 - A 25-metre buffer beside the ROW which has potential for associated land clearance.
 - An additional 250-metre buffer comprising an area where land clearance is unlikely to occur, but where impacts to BHRs and CHLs may be experienced.

This approach is consistent with Ontario Ministry of Transportation's *Environmental Guide for Built Heritage and Cultural Heritage Landscapes* (2007), which is of relevance to this project. It considers three zones defined as all lands to be affected adversely either through displacement and/or distribution by the proposed highway design and construction within the existing and proposed highway ROW and the off-route zones adjacent or abutting the existing ROW (Ministry of Transportation, 2007). This assessment for the proposed WSR similarly considers potential impacts through a three-tiered understanding of the project study areas, defined in relation to the type of potential impacts expected: lands to be cleared and developed; additional lands that may be cleared; and lands that are not expected to be cleared but which nonetheless may experience project activities that can impact BHRs and CHLs.

- **Reporting and Recommendations** – based on the results of the assessment, recommendations were developed.

20.2.1.2 Archaeological Sites and Resources

To characterize existing conditions of archaeological resources in the project study areas, the Project Team (ASI) conducted a Stage 1 Archaeological Assessment and has conducted a targeted Stage 2 Archaeological Assessment for select areas to support the Project's Geotechnical Investigations in 2024 and 2025. The Stage 1 Archaeological Assessment identified areas of archaeological potential and



recommended areas where a Stage 2 Archaeological Assessment be completed for the Project. Methods and scopes of these assessments are summarized in the following subsections.

20.2.1.2.1 Stage 1 Archaeological Assessment

A Stage 1 Archaeological Assessment is a background study and property inspection carried out by a consultant archaeologist to determine whether there is potential for archaeological sites within the project study areas. If areas of archaeological potential are identified in the Stage 1 Archaeological Assessment, then a Stage 2 Archaeological Assessment is required. A Stage 1 Archaeological Assessment was completed for the Project in September 2024. Desktop data collection for the desktop Stage 1 Archaeological Assessment report comprised the following tasks:

- **Background historical research** – This task includes consultation of primary and secondary source research and historical mapping, to identify land use and settlement patterns and broad agents or themes of change in a study area. This stage in the data collection process enables the researcher to determine the presence of sensitive heritage areas that correspond to traditional Indigenous settlement and land use patterns and nineteenth- and twentieth-century Euro-Canadian settlement and development patterns.
- **Description of the physiography, surficial geology, soils, water sources, and topography** – The Standards and Guidelines for Consultant Archaeologists (MCM, 2011a) stipulate that primary water sources (lakes, rivers, streams, creeks, etc.), secondary water sources (intermittent streams and creeks, springs, marshes, swamps, etc.), ancient water sources (glacial lake shorelines indicated by the presence of raised sand or gravel beach ridges, relic river or stream channels indicated by clear dip or swale in the topography, shorelines of drained lakes or marshes, cobble beaches, etc.), as well as accessible or inaccessible shorelines (high bluffs, swamp or marsh fields by the edge of a lake, sandbars stretching into marsh, etc.) are characteristics that indicate archaeological potential. Other geographic characteristics that can indicate archaeological potential include elevated topography (eskers, drumlins, large knolls, and plateaux), pockets of well drained sandy soil, especially near areas of heavy soil or rocky ground, distinctive land formations that might have been special or spiritual places, such as waterfalls, rock outcrops, caverns, mounds, and promontories and their bases. There may be physical indicators of their use, such as burials, structures, offerings, rock paintings or carvings. Resource areas, including food or medicinal plants (migratory routes, spawning areas) are also considered characteristics that indicate archaeological potential (MCM, 2011a).
- **Review of previous archaeological assessments** – In Ontario, information concerning archaeological sites is stored in the Ontario Archaeological Sites Database maintained by the MCM. Previously registered archaeological sites were identified within a 1 km radius of the project study areas. Previous archaeological reports that detail fieldwork were identified within a 50 m radius of the project study areas.
- **Review of Community Based Land Use Plans and previous reporting within the project study areas** – As available, to identify known or potential archaeological resources.
- **Incorporation of Indigenous Knowledge** – Review all Indigenous input regarding available Indigenous traditional knowledge of culturally important sites and areas obtained through Indigenous Knowledge and Land and Resource Use program and engagement and consultation activities conducted for the Project. This knowledge is a key information source for identifying CHLs within the project study areas.
- **Preparation of mapping** – Showing the location of the areas of high and low archaeological potential within the project study areas.



20.2.1.2.2 Stage 2 Archaeological Assessment

The Project Team (ASI) has adopted a targeted and staged approach for conducting the recommended Stage 2 Archaeological Assessment for the Project, which included an assessment of select areas to support the Project's Geotechnical Investigations in 2024 and 2025. Further Stage 2 Archaeological Assessment efforts to support the geotechnical program are also planned in late spring 2026 and in future development phases of the Project. The Stage 2 Archaeological Assessment adheres to Standards and Guidelines for Consultant Archaeologists (MCM, 2011a), and applicable site-specific approaches approved by MCM. Field data collection for the Stage 2 Archaeological Assessment report required the following tasks:

- Key parts (areas identified as having archaeological potential) of the project study areas were walked in transects appropriate to the nature of the development. In most cases transects were random and were designed to examine all or key sample areas with potential for archaeology and other heritage resources.
- Shovel testing was done if there is the potential for buried archaeological deposits following Standards and Guidelines for Consultant Archaeologists (MCM, 2011a).
- Shovel testing intensity within an archaeological site was based on the potential for site impacts. Site avoidance was normally the first option considered.
- Heritage resources identified during an Historic Resource Impact Assessment (HRIA) were further assessed and reported. Multiple Stages of HRIA may be required depending on potential options for delineation, significance evaluations, and mitigation needs.
- Monitoring for archaeological resources during construction is not a normal practice because the intent of an HRIA is to identify all or most of the heritage resources in the development area so that site avoidance or mitigation strategies can be developed. However, in some particular instances monitoring can be a requirement of the MCM if timing or conditions limited the effectiveness of an HRIA. In these cases, monitoring will be conducted in strict compliance with the stated requirements of the MCM.

20.2.2 Results

20.2.2.1 Built Heritage Resources

The Project Team did not identify individual BHRs as part of the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment. Any individual structures of potential cultural heritage significance that may be impacted by the proposed WSR have been addressed as part of larger CHLs (see **Section 20.2.2.2**). These include, but are not limited to, habitation sites such as cabins that support harvesting activities. This approach to feature identification is appropriate given that human land use patterns in the project study areas and context are intrinsically interconnected with the surrounding landscape.

20.2.2.2 Cultural Heritage Landscapes

The results of background historical research indicate a study area with a terrain dominated by woodlands, wetlands, and watercourses with a human history dating back millennia. Traditional land and resource uses including hunting, fishing, and gathering continue into the twenty-first century by members of Webequie First Nation and other Indigenous communities. Background research, including a review of federal, provincial, and registers, inventories, and databases, review of historical mapping and secondary sources, and review of available and shared Indigenous Knowledge and Land and Resource Use



information led to the identification of three CHLs by the Project Team. Each CHL includes sites and areas that are located within and/or intersect with the LSA, many of which overlap. The CHLs are delineated based on types of sites and areas identified by Webequie First Nation¹ as being important to their community, both historically and today. The project study areas are located within a landscape of intersecting and interconnected travel routes, harvesting areas and sites, and cultural, spiritual and ceremonial areas and sites (refer to **Table 20-6** below).

These areas and sites are generally located within 50 km of the Webequie First Nation community. They are individually mapped and may be considered interrelated CHL units that together form part of a larger Webequie First Nation cultural landscape. The identified areas and sites are physically, historically, contextually, and/or spiritually associated with land use patterns in the District of Kenora and more specifically representative of the ongoing Indigenous traditional practices and settlement patterns of the Webequie First Nation and surrounding area.

Additional areas and sites of significance within the LSA may be identified by Webequie First Nation or other Indigenous communities during ongoing engagement and consultation activities for the proposed WSR. The approach to the identification of CHLs presented in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment allows for the easier inclusion of additional areas and sites of significance within the identified CHLs. It is anticipated that similar types of significant sites and areas will likely be affected by similar types of potential impacts as a result of the proposed WSR. It is also anticipated that similar types of significant sites will require similar mitigative responses.

As noted in the Webequie First Nation *IK Study*, the entire landscape setting within which the proposed Webequie Supply Road is located is of significance to Webequie First Nation: “Study participants stated that “everywhere” surrounding the Webequie reserve and the proposed route for the Webequie Supply Road was important to them and their families for traditional land and resource use. The community’s hunting, trapping, fishing and habitation areas are tied to specific family groups and clans. These lands were passed down from generation to generation through paternal lines” (Stantec Consulting Ltd., 2024b, p. 47). Additionally, Webequie First Nation describes the Ring of Fire region as “the lungs of the earth” which holds an important spiritual value: “disturbing this area without stewardship input and knowledge will cause it to become unstable.” (Stantec Consulting Ltd., 2024b, p. 80).

Table 20-6: Summary of Known and Potential Cultural Heritage Landscapes within the Project Study Areas

Feature ID	Type	Description
CHL 1	Travel Routes (Land and Water-based)	CHL 1 presents a network of travel routes identified by Webequie First Nation, sections of which are located within or intersect with the LSA. Various segments have been identified as trails, historical travel routes, trapping routes, multi-purpose routes, and portages. CHL 1 also includes an historical trail (approximate location of the trail has been mapped) that has been used by the people of Marten Falls First Nation for hundreds of years. For example, a participant who mapped the trail noted, “they have used it to visit their grandmother in Attawapiskat” (Marten Falls First Nation, 2024, p. 39). See Table 1 in the Cultural Heritage Report: Existing Conditions and Preliminary Impact

¹ With the exception of one historical travel route (see CHL 1), all identified sites and areas forming the CHLs were identified by members of Webequie First Nation. Other Indigenous communities may identify additional areas and sites of significance during ongoing engagement and consultation activities for the proposed WSR.



Feature ID	Type	Description
		Assessment (Appendix S of this EAR/IS) for a detailed description of potential cultural heritage value or interest.
CHL 2	Harvesting Sites or Areas	<p>CHL 2 presents a network of harvesting areas and sites identified by Webequie First Nation in the <i>IK Study</i>, which are located within and/or intersect with the LSA (Stantec Consulting Ltd., 2024b, p. 47-71). Webequie First Nation members continue traditional practices, with fishing, hunting, trapping, and gathering berries, wild plant foods, and medicines the most common harvesting activities. The Ministry of Citizenship and Multiculturalism “Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes: A Checklist for the Non-Specialist” (2016) explains that traditional use areas can have special associations for communities and have potential for cultural heritage resources (MCM, 2016). CHL 2 presents the following areas and sites:</p> <ul style="list-style-type: none"> ▪ Hunting sites, hunting areas, and trapping areas that are located within and/or intersect with the LSA; ▪ Fishing sites and fishing areas that are located within and/or intersect with the LSA; ▪ Berry picking areas, food plan harvesting areas, wild rice harvesting areas, medicine harvesting areas, and spring water sites that are located within and/or intersect with the LSA; and ▪ Habitation sites that support harvesting activities that are located within the LSA. <p>Additional harvesting areas and sites may be identified by Webequie First Nation or other First Nations as the Webequie Supply Road project progresses.</p> <p>See Table 1 in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (Appendix S of this EAR/IS) for a detailed description of potential cultural heritage value or interest.</p>
CHL 3	Cultural, Spiritual, and Ceremonial Sites or Areas	<p>CHL 3 presents cultural, spiritual, and ceremonial sites or burial areas and language points identified by Webequie First Nation in the <i>IK Study</i> that are located within and/or intersect with the LSA. These types of sites may include, but are not limited to, historic village sites, occupation sites, burial sites, cultural monuments, and spiritually significant natural areas (Stantec Consulting Ltd., 2024b, pp. 80–86).</p> <p>Additional culturally significant sites may be identified by Webequie First Nation or other First Nations as the Project progresses. See Table 1 in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (Appendix S of this EAR/IS) for a detailed description of potential cultural heritage value or interest.</p> <p>It should be noted that the location of some sacred areas within the community’s territory cannot be shared with outsiders and as such associated feature mapping is representative and not exhaustive. For example: “One Elder explained that there is a waterfall in an [sic] he used to go caribou and goose hunting where, during a short time of the year in March, the waterfall dries up and a series of pictographs are revealed depicting a family going caribou hunting. He said, “My grandfather told me, ‘don’t ever tell anyone. Don’t ever teach it. Don’t ever speak it. Don’t ever bring anybody here”” (Webequie August 2024 sessions). These kinds of locations must be kept private to Webequie First Nation (Webequie August 2024 sessions).” (Stantec Consulting Ltd., 2024b, p. 85).</p>

20.2.2.3 Archaeological Resources

20.2.2.3.1 Stage 1 Archaeological Assessment

The Stage 1 Archaeological Assessment found that only one previously registered archaeological site (FelN-1) is located within the RSA near the Muketei River. A review of the Land Use Plans and Indigenous Knowledge and Land and Resource Use information from Webequie First Nation, Marten Falls First Nation, and Weenusk First Nation indicated that there are 39 features of cultural significance from these studies which indicate archaeological potential within the LSA. In accordance with Standards and Guidelines for Consultant Archaeologists – Section 2.1.5 Alternative Strategies for Special Survey Conditions: Test Pit Survey in northern Ontario and on Canadian Shield Terrain (MCM, 2011a), parts of the LSA require a Stage 2 Archaeological Assessment.

The remainder of the LSA has been identified as exhibiting low archaeological potential on account of presumed disturbed or being located within vast wetlands and poorly drained permanently saturated soils. However, these areas retain archaeological potential until a property inspection is carried out to identify all archaeological resources that may be present (MCM, 2011a).

Considering results of Stage 1 Archaeological Assessment, the following recommendations are made:

1. Part of the LSA exhibits high archaeological potential within 50 m of modern water sources [REDACTED] These areas require Stage 2 test pit survey at m intervals, prior to any proposed construction impacts, in accordance with Standards and Guidelines for Consultant Archaeologists Section 2.1.5 Standard 1 (MCM, 2011a);
2. Part of the LSA exhibits high archaeological potential within 150 m of features of archaeological potential based on available Indigenous Knowledge and Land and Resource Use information [REDACTED] These areas require Stage 2 test pit survey, prior to any proposed construction impacts, in accordance with Standards and Guidelines for Consultant Archaeologists Section 2.1.5 Standard 2 (MCM, 2011a);
3. Parts of the LSA are within pockets of well-draining soil surrounded by rockland and exhibit archaeological potential [REDACTED] These areas require Stage 2 test pit survey, prior to any proposed construction impacts, in accordance with Standards and Guidelines for Consultant Archaeologists Section 1.3.3 Standard 2 (MCM, 2011a);
4. Part of the LSA does not retain archaeological potential on account of disturbance from the construction of the existing roadways, airport, and Eagle's Nest Mine area [REDACTED] However, these areas retain archaeological potential until a property inspection is carried out to confirm the extent of disturbance;
5. The remainder of the LSA is located in presumed permanently saturated soils of swampy wetlands and exhibit low archaeological potential. These areas retain archaeological potential until a property inspection is carried out to confirm the extent of the swamps and to locate the shorelines; Parts of these permanently saturated areas of low archaeological potential are also considered remote and inaccessible and Stage 2 survey is not required for these areas under the *Standards and Guidelines* Section 1.3.4;
6. If impacts to lakebeds or riverbeds are proposed, archaeological potential must be evaluated following the MCM's *Criteria for Evaluating Marine Archaeological Potential* checklist; and
7. Should the proposed work extend beyond the project study areas defined in **Section 20.1.5.1**, further Stage 1 Archaeological Assessment should be conducted to determine the archaeological potential of the surrounding lands.



20.2.2.3.2 Stage 2 Archaeological Assessment

No archaeological features or sites were identified during the limited Stage 2 Archaeological Assessment conducted to date that is intended to support the Project's Geotechnical Investigations in 2024 and 2025. As noted in **Section 20.2.1.2.2**, further work for Stage 2 Archaeological Assessment for the Project is planned in late spring 2026 and in future development phases of the Project and will adhere to Standards and Guidelines for Consultant Archaeologists (MCM, 2011a), and applicable site-specific approaches approved by MCM.

20.3 Identification of Potential Effects, Pathways, and Indicators

As indicated in **Table 20-5**, some project activities may interact with and impose potential effects on the Cultural Heritage Resources VC during the project construction and operations. This section describes the nature of the potential effects, the pathways that link the project activities and the effects, and the indicators that can be used to assess and measure the effects. The descriptions of effect pathways for BHRs and CHLs are grouped together in **Section 20.3.1** to avoid repetition.

Table 20-7 summarizes the potential effects, effects pathways, and effect indicators for the Cultural Heritage Resources VC. The potential effects of accidental spills on Cultural Heritage Resources are assessed in Section 23 – Accidents and Malfunctions.

20.3.1 Change to Built Heritage Resources and Cultural Heritage Landscapes

The development of transportation infrastructure has the potential to affect BHRs and CHLs in various ways. As the project study areas consists largely of provincial Crown land, these potential effects are outlined in *Information Bulletin 3: Heritage Impact Assessments for Provincial Heritage Properties* (MCM, formerly Ministry of Tourism, Culture and Sport, 2017) and summarized below.

Construction and operation activities involving vegetation clearing, ground disturbance, and land disturbance → Loss of or damage to BHRs and CHLs

Construction Phase

Construction activities may have the following potential effects on BHRs and CHLs:

- Removal or demolition of all or part of any heritage attribute;
- Removal or demolition of any building or structure on the provincial heritage property whether or not it contributes to the cultural heritage value or interest of the property (i.e. non-contributing buildings);
- Any land disturbance, such as a change in grade and/or drainage patterns that may adversely affect a provincial heritage property, including archaeological resources;
- Alterations to the property in a manner that is not sympathetic, or is incompatible, with cultural heritage value or interest of the property. This may include necessary alterations, such as new systems or materials to address health and safety requirements, energy-saving upgrades, building performance upgrades, security upgrades or servicing needs;
- Alterations for access requirements or limitations to address such factors as accessibility, emergency egress, public access, security;



- Introduction of new elements that diminish the integrity of the property, such as a new building, structure or addition, parking expansion or addition, access or circulation roads, landscape features;
- Changing the character of the property through removal or planting of trees or other natural features, such as a garden, or that may result in the obstruction of significant views or vistas within, from, or of built and natural features;
- Change in use for the provincial heritage property that could result in permanent, irreversible damage or negates the property's cultural heritage value or interest;
- Continuation or intensification of a use of the provincial heritage property without conservation of heritage attributes;
- Shadows that alter the appearance of a heritage attribute or change the visibility of an associated natural feature or plantings, such as a tree row, hedge or garden;
- Isolation of a heritage attribute from its surrounding environment, context or a significant relationship;
- Vibration damage to a structure due to construction or activities on or adjacent to the property; and
- Alteration or obstruction of a significant view of or from the provincial heritage property from a key vantage point.

In accordance with MCM's Information Bulletin 3 (MCM, formerly Ministry of Tourism, Culture and Sport, 2017), direct adverse effects are identified where the following resulting conditions are anticipated:

- A permanent and irreversible negative effect on the cultural heritage value or interest of a property; and
- Loss of a heritage attribute on all or part of the provincial heritage property.

Indirect adverse impacts are identified where activities on or near the property may adversely affect its cultural heritage value or interest and/or heritage attributes. Positive impacts may also result where a property's cultural heritage value or interest and/or heritage attributes is conserved or enhanced.

Based on the information available, the following is a preliminary summary of potential impacts on identified CHLs and their constituent significant areas and sites:

CHL 1: Travel Routes

- The area of known or potential land clearance associated with the preliminary recommended preferred route and/or associated supportive infrastructure intersects with a number of travel routes and, as such, potential direct adverse impacts are anticipated.
 - The proposed construction of bridges and culverts will have direct adverse impacts on the water-based travel routes.
- The additional 250-metre buffer comprising an area where land clearance is unlikely to occur, but where impacts to CHLs may be experienced, also intersects with a number of travel routes and, as such, potential indirect adverse impacts are anticipated.

CHL 2: Harvesting Areas and Sites – including Hunting and Trapping, Fishing, Plant Gathering and Spring Water Sites, and Habitation Sites that Support Harvesting Activities

- The area of known or potential land clearance associated with the preliminary recommended preferred route and/or associated supportive infrastructure intersects with land identified as important for harvesting activities and, as such, potential direct adverse impacts are anticipated.
 - Of note, ARA-4 is located in an area identified by Webequie First Nation as an important plant harvesting and spring water collection area. This area is also identified as a culturally sensitive area.



- The additional 250-metre buffer comprising an area where land clearance is unlikely to occur, but where impacts to CHLs may be experienced, intersects with areas and sites identified as important for harvesting activities, and, as such, potential indirect adverse impacts are anticipated.
- Three habitation sites have been identified within the LSA, one within the LSA of the proposed route and two within the LSA of the proposed access road to ARA-4. Of the three habitation sites, one is located within the area of known or potential clearance associated with the preliminary recommended route and another is located within the additional 250-metre buffer comprising an area where land clearance is unlikely to occur, but impacts may be experienced. It should be noted, however, that given the scale of hard copy mapping used as part of interview and validation sessions, cabin locations may not be precise.

CHL 3: Cultural, Spiritual and Ceremonial Areas and Sites

- The area of known or potential land clearance associated with the preliminary recommended preferred route and/or associated supportive infrastructure intersects with areas identified as important culturally sensitive areas and sites, burial area, and language points, and, as such, potential direct adverse impacts are anticipated.
 - Of note, ARA-4 (see **Figure 20.1** for location) is located in an area identified by Webequie First Nation as a culturally sensitive area. The area is also identified as an important plant harvesting and spring water collection area.
- The additional 250-metre buffer comprising an area where land clearance is unlikely to occur, but where impacts to CHLs may be experienced, intersects with areas identified as important culturally sensitive areas and sites, burial area, and language points, and, as such, potential indirect adverse impacts are anticipated.

In regard to potential impacts to oral history and culture, Marten Falls First Nation members have identified that blasting techniques used to break up rock formations as part of road construction or related development might negatively impact the homes of the *Ma-ma-kwa-se-sak*. In Marten Falls First Nation oral history and culture, the *Ma-ma-kwa-se-sak* are little people who live in the rocks.

Operations Phase

Potential project-related effects during operations include both positive and negative effects. Construction of a new road has the potential to provide improved access to traditional areas and some of the CHLs identified in this assessment and, more broadly, the traditional territory of the individual First Nations.

Construction of a new road and associated infrastructure, however, also has the potential to isolate a CHL or heritage attribute from its surrounding environment, context, or a significant relationship. Other related adverse effects that may also lead to negative impacts to culturally significant sites may include, but are not limited to: pollution, changes to wildlife habitats, heightened exposure to outsiders and external influences, interference with land use, health and safety risks, loss of connection to the land, impacts to oral history and culture, and other potential negative impacts (Marten Falls First Nation, 2024). Webequie First Nation identified similar potential adverse effects as a result of the proposed WSR (Stantec Consulting Ltd., 2024b).

20.3.2 Change to Archaeological Resources

The pathways in which project activities may affect archaeological resources are described below.

Construction and operation activities involving ground disturbance and land disturbance → Damage or destruction of archaeological resources



Construction Phase

During the construction phase, alteration of the landscape can result in damage or destruction of both terrestrial and marine archaeological resources. These alterations can involve displacement of artifacts, resulting in the loss of valuable contextual information, or may result in the complete destruction of artifacts and features leading to complete loss of data. Activities with the potential to cause ground disturbance may affect archaeological resources unless appropriate steps are taken in advance to identify and either protect the resource or have the resource properly excavated by a licensed consultant archaeologist, following the recommended measures in the Standards and Guidelines for Consultant Archaeologists (MCM, 2011a). Avoidance and protection of archaeological resource sites is the preferred approach per the Standards and Guidelines for Consultant Archaeologists (MCM, 2011a).

The construction phase will have a potential impact on any archaeological sites identified during the Stage 2 Archaeological Assessment as well as any deeply buried sites not identified during the Stage 2 assessment. Sites with cultural heritage value or interest identified during the Stage 2 Archaeological Assessment are subject to Stage 3 investigation according to MCM Standards and Guidelines in order to determine further cultural heritage value (CHV).

Archaeological sites identified to have further CHV during Stage 3 assessment must be subject to Stage 4 Archaeological Mitigation that will determine whether the site will be subject to salvage excavation or protection prior to construction.

Should previously undocumented archaeological resources be discovered during the construction phase, they may be a new archaeological site and therefore subject to Section 48(1) of the OHA. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out archaeological fieldwork, in compliance with Section 48(1) of the OHA. If human remains are encountered during the construction phase, the *Funeral, Burial and Cremation Services Act* requires that any person discovering or having knowledge of a burial site shall immediately notify the police or coroner. It is recommended that the Registrar of Cemeteries at the Ministry of Public and Business Service Delivery and Procurement is also immediately notified.

Operations Phase

Operations phase may impact archaeological sites that were protected within the project study areas. However, there should be no impact on any archaeological resources that were identified and salvage excavated prior to the construction phase.

The mitigation identified for “loss of, or damage to, an archaeological resource from construction activities” will minimize presence of known archaeological resources in the Project Footprint. The proponent or its delegated contractor(s) will prepare and implement a Cultural Heritage Resources Management Plan prior to construction to provide direction in the event that archaeological resources not previously identified are encountered.

Should previously undocumented archaeological resources be discovered during the operations phase, they may be a new archaeological site and therefore subject to Section 48(1) of the OHA. The proponent or person discovering archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out archaeological fieldwork, in compliance with Section 48(1) of the OHA.

If human remains are encountered during the operations phase, the *Funeral, Burial and Cremation Services Act* requires that any person discovering or having knowledge of a burial site shall immediately notify the police or coroner. It is recommended that the Registrar of Cemeteries at the Ministry of Public and Business Service Delivery and Procurement is also immediately notified.



Table 20-7: Potential Effects, Pathways and Indicators for Cultural Heritage Resources VC

Potential Effect	Project Phase	Effect Pathway	Effect Indicators	Nature of Interaction and Effect (Direct or Indirect)	Linked VCs
Change to built heritage resources (BHRs)	Construction and Operations	<p>Activities related to construction and operations of the proposed WSR and supportive infrastructure that may result in direct or indirect effects on identified BHRs and CHLs include, but are not limited to:</p> <ul style="list-style-type: none"> Clearing and grubbing of vegetation (forest and wetland), including removal, chipping and/or disposal. Removal and stockpiling of organics, subgrade excavation, placement of fill and gravel, grading and drainage work (e.g., road ditches, erosion protection, etc.) associated with construction of road and new supportive infrastructure. Construction and installation of new structures at waterbody crossings. Blasting and aggregate extraction and processing. Vibrations related to construction activities. Ecological or human-induced accidents such as flooding and forest fires. <p>Direct adverse impacts are identified where the following resulting conditions are anticipated:</p> <ul style="list-style-type: none"> A permanent and irreversible negative affect on the cultural heritage value or interest of a BHR or CHL. Loss of a heritage attribute on all or part of a BHR or CHL. 	<ul style="list-style-type: none"> Change to the number or condition of Indigenous or non-Indigenous BHRs that may be impacted (e.g., old trapping or hunting camps, etc.) and/or CHLs that may be impacted (e.g., spiritual or symbolic sites of value or interest to Indigenous communities). Changes to sites or things of historical or cultural significance, oral histories, cultural values and experiences of being on the land. Construction of a new road and associated infrastructure also has the potential to isolate a BHR, CHL, or heritage attribute from its surrounding environment, context, or a significant relationship. 	Direct and indirect	<p>The assessment of this VC is informed by the effects assessment for other VCs:</p> <ul style="list-style-type: none"> Geology, Terrain and Soils (Section 6) Surface Water Resources (Section 7) Groundwater Resources (Section 8) Atmospheric Environment (Section 9) Fish and Fish Habitat (Section 10) Vegetation and Wetlands (Section 11) Wildlife and Wildlife Habitat (Section 12) Species at Risk (Section 13) Social Environment (Section 14) Non-Traditional Land and Resource Use (Section 16) Visual Environment (Section 18) <p>The assessment of this VC informs the effects assessment for other VCs:</p> <ul style="list-style-type: none"> Aboriginal and Treaty Rights and Interests (Section 19)
Change to cultural heritage landscapes (CHLs)		<p>Indirect adverse impacts are identified where activities on or near a BHR or CHL may adversely affect its cultural heritage value or interest and/or heritage attributes.</p> <p>Other related adverse effects that may also lead to negative impacts to culturally significant sites may include, but are not limited to: pollution, changes to wildlife habitats, heightened exposure to outsiders and external influences, interference with land use, health and safety risks, loss of connection to the land, impacts to oral history and culture, and other potential negative impacts</p>			
Change to archaeological resources	Construction and Operations	<p>Activities related to construction and operation of the road and supportive infrastructure that may result in direct or indirect effects on archaeological sites and resources include, but are not limited to:</p> <ul style="list-style-type: none"> Clearing and grubbing of vegetation (forest and wetland), including removal, chipping and/or disposal. Removal and stockpiling of organics, subgrade excavation, placement of fill and gravel, grading and drainage work (e.g., road ditches, erosion protection, etc.) associated with construction of road and new supportive infrastructure. Construction and installation of new structures at waterbody crossings. Blasting and aggregate extraction and processing. Ecological or human-induced accidents such as flooding and forest fires. <p>Direct adverse impacts are identified where the following resulting conditions are anticipated:</p> <ul style="list-style-type: none"> A permanent and irreversible negative affect on an archaeological site or resource. 	<ul style="list-style-type: none"> Destruction or damage to an archaeological site or resource. 	Direct and Indirect	<p>The assessment of this VC is informed by the effects assessment for other VCs:</p> <ul style="list-style-type: none"> Geology, Terrain and Soils (Section 6) Surface Water Resources (Section 7) Groundwater Resources (Section 8) Atmospheric Environment (Section 9) Fish and Fish Habitat (Section 10) Vegetation and Wetlands (Section 11) Wildlife and Wildlife Habitat (Section 12) Species at Risk (Section 13) Social Environment (Section 14) Non-Traditional Land and Resource Use (Section 16) Visual Environment (Section 18) <p>The assessment of this VC informs the effects assessment for other VCs:</p> <ul style="list-style-type: none"> Aboriginal and Treaty Rights and Interests (Section 19)

20.4 Mitigation Measures

This section describes proposed mitigation measures to eliminate or reduce the potential effects of the Project on the Cultural Heritage Resources VC. A summary of the potential effects, mitigation measures and predicted net effects for Cultural Heritage Resources VC is provided in **Table 20-8**. Further measures will be provided in the Construction Environmental Management Plan and the Operation Environmental Management Plan that will be developed for the Project. Refer to Section 4.6 for details of the proposed framework for the development of the Construction Environmental Management Plan and the Operation Environmental Management Plan.



Indigenous community members will have an active role in developing and implementing management plans.



An Environment Committee will be established to facilitate communication and engagement during construction and operations of the Project. Committee members will include Webequie First Nation Elders and Knowledge Holders, other First Nations with interest in participating, and appropriate project representatives, to: facilitate communication and engagement during construction and operations of the Project; facilitate use of Indigenous Knowledge in project activities; facilitate evaluation of land use information; and facilitate development of appropriate monitoring programs, protocols and management plans as it relates to Cultural Heritage Resources VC.

20.4.1 Built Heritage Resources and Cultural Heritage Landscapes

The following recommendations have been developed as part of the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (Appendix S):

1. As there are direct adverse impacts anticipated for CHL 1, CHL 2, and CHL 3, and given their potential cultural heritage value, Cultural Heritage Evaluation Reports (CHER) should be completed at the earliest possible phase of the next stage of design (i.e., detail design). The commitment to complete the CHERs will specifically occur after approval of the Project (if received) and during the phase where the proponent will obtain all other applicable permits, licenses and authorizations needed to proceed to construction.

As the three CHLs (or parts thereof) are located on provincially-owned Crown land, the *Standards and Guidelines for Conservation of Provincial Heritage Properties* (Government of Ontario, 2010) must be followed. An evaluation against both Ontario Regulation (O.Reg.) 9/06 and O.Reg. 10/06 will be completed for each CHL to determine their Cultural Heritage Value or Interest (CHVI). O.Reg. 9/06 provides criteria to determine the CHVI at a local level to determine whether it is a Provincial Heritage Property, while O.Reg. 10/06 provides criteria to determine if the resource has CHVI of provincial significance to determine whether it is a Provincial Heritage Property of Provincial Significance. Minister's Consent is required where properties that meet O.Reg. 10/06 are subject to direct impacts such as removal, demolition, alteration of heritage structures/landscapes, or transfer from provincial control.

CHERs will be completed in collaboration with the proponent and their Consultation Lead, Webequie First Nation Elders and Knowledge Holders (as appropriate), and while following provincial guidelines, to determine the appropriate scope, methodology and approach to the



completion of the CHERs of these cultural sensitive sites and areas. Guidance documents include the following:

- Standards and Guidelines for Conservation of Provincial Heritage Properties – Heritage Identification & Evaluation Process (Government of Ontario, 2014).
2. Should the CHER determine that a CHL has CHVI, a Heritage Impact Assessment (HIA) must be conducted to develop appropriate mitigation measures. The proposed undertaking should endeavor to avoid adversely affecting known and potential cultural heritage resources and interventions should be managed in such a way that identified significant cultural heritage resources are conserved. When the nature of the undertaking is such that adverse effects are unavoidable, it may be necessary to implement alternative approaches or mitigation strategies that alleviate the negative effects on identified BHRs and CHLs. Mitigation is the process of lessening or negating anticipated adverse effects to cultural heritage resources and may include, but are not limited to, such actions as avoidance, monitoring, protection, relocation, remedial landscaping, and documentation of the BHR or CHL if to be demolished or relocated. Strategic Conservation Plans may also be a possible mitigation measure. Guidance documents include the following:
- Information Bulletin 2 – Strategic Conservation Plans for Provincial Heritage Properties (Government of Ontario, 2017a).
 - Information Bulletin 3 – Heritage Impact Assessment for Provincial Heritage Properties (Government of Ontario, 2017b).

Engagement with Webequie First Nation Elders and Knowledge Holders may provide further insights into appropriate mitigation measures for these culturally significant sites. For example, the following potential mitigation measures have been suggested by Webequie First Nation Elders as part of the *Webequie First Nation IK Study*, and similar mitigation measures may be identified as part of an HIA:

- “One Elder recommended the medicines along the route be identified before construction begins (Webequie August 2024 sessions)” (Stantec Consulting Ltd., 2024b, p. 70).
 - “Participants recommended the use of checkpoints along the roadway to clean equipment and monitor for invasive species, especially regarding micro-organisms and invasive plants carried on boat motors and snowmobiles (Webequie August 2024 sessions)” (Stantec Consulting Ltd., 2024b, p. 70).
 - “These sacred areas could be protected by not building the road², the Elder suggested. However, alternative mitigations might include having spiritual monitors who were trained by Elders in the community on what sites or areas they should monitor (Webequie August 2024 sessions)” (Stantec Consulting Ltd., 2024b, p. 86).
3. Construction activities and staging should be suitably planned and undertaken to avoid impacts to identified CHLs.

² This suggestion was provided in relation to the area near Aggregate Source Area 4, which is identified by the Elder as a “very sacred area”.



20.4.2 Archaeological Resources

Direct effects can be avoided by identifying and avoiding archaeological resources prior to ground disturbance, and by increasing the awareness of project personnel about any identified archaeological resources in the Archaeological Resources LSA.

[REDACTED] there are areas of archaeological potential within the project study areas. The required archaeological assessments will be undertaken in areas identified in the Stage 1 Archaeological Assessment as exhibiting archaeological potential before planned construction in these areas. Acceptance of the Stage 1 Archaeological Assessment report and its recommendations by the MCM under the OHA will be obtained before ground disturbance associated with project construction.

The Project Footprint will require a Stage 2 Archaeological Assessment prior to construction for the areas identified as having archaeological potential and recommended for further archaeological work. The results of the Stage 2 Archaeological Assessment will be used to develop strategies to mitigate potential direct effects of the Project on any archaeological resources identified within or adjacent to the Project.

Archaeological sites identified in the Archaeological Resources LSA through the completion of the Stage 2 Archaeological Assessment will be subject to avoidance and protection measures to avoid loss of, or damage to, archaeological resources, or assessed and mitigated by excavation through engagement with Indigenous communities and per the Standards and Guidelines for Consultant Archaeologists (MCM 2011a; MCM 2011b). Typically, archaeological sites in boreal forest environments are identified and assessed, with potential effects mitigated, through the following strategies:

- Archaeological test pit survey (Stage 2 Archaeological Assessment) at 5 m or 10 m intervals, to provide an inventory of archaeological resources (sites);
- Site-specific assessment (Stage 3 Archaeological Assessment) to determine the limits and cultural heritage value or interest of the archaeological site; and
- Mitigation measures of the archaeological site (Stage 4 Archaeological Mitigation) through protection and avoidance or excavation.

Not all identified archaeological sites are recommended for subsequent archaeological work (Stage 3 Archaeological Assessment and Stage 4 Archaeological Mitigation). After archaeological sites are identified, criteria provided in the Standards and Guidelines for Consultant Archaeologists (MCM, 2011a) are used to determine if they should be recommended for further assessment. Mitigation strategies will be developed per the MCM Standards and Guidelines for Consultant Archaeologists (MCM, 2011a) if an archaeological site is recommended for further assessment and avoidance mitigation strategies cannot be implemented.

Should notable archaeological sites be identified, then Stage 3 Archaeological Assessment, and possibly Stage 4 Archaeological Mitigation, may be required depending on whether the identified site(s) will be affected during construction. Stage 3 Archaeological Assessment and Stage 4 Archaeological Mitigation are only required when an archaeological site or its protective buffer will be affected by Project impacts, including infrastructure construction, access routes, and the establishment of staging or laydown areas. Specifically:

- Stage 3 Archaeological Assessment will be undertaken if additional information is needed for a site to determine its extent, further assess its cultural heritage value or interest, and determine if the site requires Stage 4 Archaeological Mitigation to address Project impacts to the resource.



- Stage 4 Archaeological Mitigation will be undertaken if a site with cultural heritage value or interest warrants protection under the OHA through either avoidance by relocating Project infrastructure, or excavation, if avoidance is not possible.

In addition, a Cultural Heritage Resources Management Plan will be developed to guide contractors in the event that previously unidentified cultural heritage or archaeological resources (e.g., projectile points, modified bone, pottery fragments) are suspected or encountered unexpectedly during construction. The plan will include the following provisions:

- Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the *Ontario Heritage Act*. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the *Ontario Heritage Act*.
- The *Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33* requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with *Ontario Regulation 30/11* the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery and Procurement, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the *Ontario Heritage Act*.



Table 20-8: Summary of Potential Effects, Mitigation Measures and Predicted Net Effects for Cultural Heritage Resources VC

VC Subcomponent	Indicators	Project Phase	Project Component or Activity	Potential Effect	Mitigation Measures	Predicted Net Effect
Built heritage resources (BHRs)	<ul style="list-style-type: none"> Number and type of Indigenous or non-Indigenous BHRs that may be impacted (e.g., old trapping or hunting camps, etc.) and/or CHLs that may be impacted (e.g., spiritual or symbolic sites of value or interest to Indigenous communities). Number of Provincial heritage properties affected. Changes to sites or things of historical or cultural significance, oral histories, cultural values and experiences of being on the land. 	Construction and Operations	<ul style="list-style-type: none"> Vegetation clearing and grubbing; Construction and use of supportive infrastructure; Construction of road; Construction of structures at waterbody crossings; Decommissioning / Closure of Temporary Aggregate Extraction and Processing Areas (pits and quarries); Decommissioning of Temporary Construction Camps, Access Roads and Laydown / Storage Areas; Completion of Project-Wide Clean-up, Site Restoration / Reclamation and Demobilization; Potential for accidents and malfunctions; Operation of Pits, Quarries and Maintenance Yard/Facility; and Potential for Accidents and Malfunctions. 	<p>Potential direct or indirect impact to BHRs and CHLs. Direct adverse impacts are identified where the following resulting conditions are anticipated:</p> <ul style="list-style-type: none"> a permanent and irreversible negative affect on the cultural heritage value or interest of a BHR or CHL; and loss of a heritage attribute on all or part of the BHR or CHL. <p>Indirect adverse impacts are identified where activities on or near the BHR or CHL may adversely affect its cultural heritage value or interest (CHVI) and/or heritage attributes.</p>	<p>As the three CHL.s (or parts thereof) are located on provincially-owned Crown land, the <i>Standards and Guidelines for Conservation of Provincial Heritage Properties</i> (Government of Ontario, 2010) must be followed. An evaluation against both Ontario Regulation (O.Reg.) 9/06 and O.Reg. 10/06 will be completed for each CHL to determine their Cultural Heritage Value or Interest (CHVI). O.Reg. 9/06 provides criteria to determine the CHVI at a local level to determine whether it is a Provincial Heritage Property, while O.Reg. 10/06 provides criteria to determine if the resource has CHVI of provincial significance to determine whether it is a Provincial Heritage Property of Provincial Significance. Minister's Consent is required where properties that meet O.Reg. 10/06 are subject to direct impacts such as removal, demolition, alteration of heritage structures/landscapes, or transfer from provincial control.</p> <p>CHERs will be completed in collaboration with the proponent and their Consultation Lead, Webequie First Nation Elders and Knowledge Holders (as appropriate), and while following provincial guidelines, to determine the appropriate scope, methodology and approach to the completion of the CHERs of these cultural sensitive sites and areas. Guidance documents include the following:</p> <ul style="list-style-type: none"> Standards and Guidelines for Conservation of Provincial Heritage Properties – Heritage Identification & Evaluation Process (Government of Ontario, 2014). <p>Should the CHERs determine that a CHL has CHVI, a Heritage Impact Assessment (HIA) must be conducted to develop appropriate mitigation measures. The proposed undertaking should endeavor to avoid adversely affecting known and potential cultural heritage resources and interventions should be managed in such a way that identified significant cultural heritage resources are conserved. When the nature of the undertaking is such that adverse effects are unavoidable, it may be necessary to implement alternative approaches or mitigation strategies that alleviate the negative effects on identified BHRs and CHLs. Mitigation is the process of lessening or negating anticipated adverse effects to cultural heritage resources and may include, but are not limited to, such actions as avoidance, monitoring, protection, relocation, remedial landscaping, and documentation of the BHR or CHL if to be demolished or relocated. Strategic Conservation Plans may also be a possible mitigation measure. Guidance documents include the following:</p> <ul style="list-style-type: none"> Information Bulletin 2 – Strategic Conservation Plans for Provincial Heritage Properties (Government of Ontario, 2017a). Information Bulletin 3 – Heritage Impact Assessment for Provincial Heritage Properties (Government of Ontario, 2017b). <p>Engagement with Webequie First Nation Elders and Knowledge Holders may provide further insights into appropriate mitigation measures for these culturally significant sites. For example, the following potential mitigation measures have been suggested by Webequie First Nation Elders as part of the <i>Webequie First Nation IK Study</i>, and similar mitigation measures may be identified as part of an HIA:</p> <ul style="list-style-type: none"> An Environment Committee will be established to facilitate communication and engagement during construction and operations of the Project. This Committee members will include Webequie First Nation Elders and Knowledge Holders, other First Nations with interest in participating, and appropriate project representatives, to: facilitate communication and engagement during construction and operations of the Project; facilitate use of Indigenous Knowledge in project activities; facilitate evaluation of land use information; and facilitate development of appropriate monitoring programs, protocols and management plans as it relates to Cultural Heritage Resources VC. 	No net effects are identified for the identified CHLs as a result of the Project with the implementation of proposed mitigation measures. Additional mitigation measures will be identified following completion of any CHER(s), HIA(s) and SCP(s) in consultation with Webequie First Nation Elders and Knowledge Holders and provincial guidelines.
Cultural heritage landscapes (CHLs)						
Archaeological resources	Number of archaeological resources identified with in the project study areas.	Construction and Operations	<ul style="list-style-type: none"> Vegetation clearing and grubbing; Construction and use of supportive infrastructure; Construction of road; Construction of structures at waterbody crossings; 	Potential damage or destruction of archaeological resources.	<p>Mitigation of archaeological resources may involve avoidance and protection or excavation in accordance with MCM Standards and Guidelines for Consultant Archaeologists for Stage 4 Mitigation, as determined through Stage 2 and 3 Archaeological Assessments. The outstanding Stage 2 assessment work, and any further stages of archaeological assessment recommended by its results, will be carried out as early as possible during detail design and prior to any ground disturbing activities.</p> <p>Webequie First Nation Elders and Knowledge Holders will be consulted for advice on scope, methodology and approach in the development of appropriate mitigation measures.</p>	No net effects are identified for the identified archaeological sites and resources as a result of the Project with the implementation of proposed mitigation measures. Additional

VC Subcomponent	Indicators	Project Phase	Project Component or Activity	Potential Effect	Mitigation Measures	Predicted Net Effect
			<ul style="list-style-type: none"> ▪ Decommissioning / Closure of Temporary Aggregate Extraction and Processing Areas (pits and quarries); ▪ Decommissioning of Temporary Construction Camps, Access Roads and Laydown / Storage Areas; ▪ Completion of Project-Wide Clean-up, Site Restoration / Reclamation and Demobilization; ▪ Potential for accidents and malfunctions; ▪ Operation of Pits, Quarries and Maintenance Yard/Facility; and ▪ Potential for Accidents and Malfunctions. 		<p>Ground-disturbing activities will not commence until archaeological assessment reports recommending no further assessment have been entered into the Ontario Public Register of Archaeological Reports.</p> <p>A Cultural Heritage Resources Management Plan will be developed to guide contractors in the event that a previously unidentified heritage or archaeological resources are suspected or encountered unexpectedly during construction. The plan will include the following provisions:</p> <ul style="list-style-type: none"> ▪ If previously unidentified archaeological resources are encountered unexpectedly during construction, the proponent or person discovering the archaeological resources shall cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>. ▪ Any person discovering human remains shall cease all activities immediately and notify the police or coroner. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>. 	<p>mitigation measures will be identified following completion of Stage 2 and Stage 3 archaeological assessments in consultation with Webequie First Nation Elders and Knowledge Holders and provincial guidelines.</p>



20.5 Characterization of Net Effects

Net effects are defined as the effects of the Project that remain after application of proposed mitigation measures. Through implementation of mitigation measures described in **Section 20.4**, potential effects on the Cultural Heritage Resources VC will be effectively avoided or mitigated as noted in **Table 20-8**. Since no net effects are predicted for the Cultural Heritage Resources VC, no characterization of net effects is required.

20.6 Determination of Significance

No net effects are predicted for the Cultural Heritage Resources VC. Therefore, no determination of significance is required.

20.7 Cumulative Effects

As there are no net effects identified for the Cultural Heritage Resources VC, there is no potential for the net effects of other projects or physical activities to act cumulatively within the same spatial and temporal boundaries. Consequently, the Cultural Heritage Resources VC is not carried forward for assessment of cumulative effects.

20.8 Prediction Confidence in the Assessment

Prediction confidence in the assessment is high based on the proponent's commitment to follow regulatory requirements outlined in **Table 20-1** and to implement mitigation measures described in **Section 20.4**.

20.9 Predicted Future Condition of the Environment if the Project Does Not Proceed

Without construction of the proposed WSR, the anticipated future state of BHRs, CHLs, and archaeological resources in the project study areas is expected to remain largely consistent with the existing conditions summarized in **Section 20.2** and described in detail in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment and Stage 1 Archaeological Assessment Report (Appendix S and Appendix T respectively of this EAR/IS). However, extreme weather events due to climate change (such as heavy precipitation and heatwaves) can directly or indirectly cause damage to or loss of BHRs, CHLs, and archaeological resources. If the Project does not proceed, there is decreased likelihood that these resources, which may be present in the Project Footprint or the LSA, will be identified, located and protected under the OHA.



20.10 Follow-Up and Monitoring

The purposes of the follow-up and monitoring programs are to:

- Verify environmental effects predictions made during the EA/IA for the Project;
- Provide data with which to evaluate the effectiveness of mitigation measures and modify or enhance these measures, where necessary;
- Provide data with which to implement adaptive management measures for improving future environmental protection activities;
- Document additional measures of adaptive measures to improve future environmental protection activities; and
- Document compliance with required conditions as stipulated in permits, approvals, licenses and/or authorizations.



The Project invites community members to participate in developing and implementing monitoring programs to assess the effectiveness of proposed mitigation measures and potential adverse effects to the environment. Where effects are considered unacceptable and/or based on concerns raised by Indigenous community members or other stakeholders, further mitigation options will be considered by the road operator in consultation with Indigenous communities and stakeholders.

A follow-up and monitoring program related to Cultural Heritage Resources VC will be developed as part of the Construction Environmental Management Plans and Operation Environmental Management Plan with inputs from further engagement and consultation with MCM, Webequie First Nation, and other Indigenous communities and will address regulatory requirements of the OHA. The Construction Environmental Management Plans and Operation Environmental Management Plan will include a Cultural Heritage Resources Management Plan with procedures and protocol when encountering unexpected heritage or archaeological resources during ground disturbance. The Cultural Heritage Resources Management Plan will give on-site personnel information to identify heritage or archaeological materials if encountered in the construction or maintenance area, procedures for notification and reporting the find, and actions to follow to protect the site from impacts. The contractor's adherence to the procedures and protocols in the Cultural Heritage Resources Management Plan will be monitored.



Indigenous community members will have an active role in developing and implementing management plans.

Additional details on the proposed follow-up and monitoring for the Project are described in Section 22 of this EAR/IS (Follow-up and Monitoring Programs).

20.11 References

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AtkinsRéalis



AtkinsRéalis

191 The West Mall
Toronto, ON M9C 5L6
Canada
416.252.5315

atkinsrealis.com

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