

Ministry of Energy

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Indigenous Energy Policy

VIA EMAIL

March 2, 2018

Daniel Charbonneau
Senior Manager, Indigenous Relations
Hydro One Networks Inc.
483 Bay Street
Toronto, Ontario M5G 2P5

Re: East-West Tie Line

Dear Mr. Charbonneau:

Thank you for your letter dated November 7, 2017 requesting clarification from the Ministry of Energy on the Duty to Consult requirements for the East West Tie Line (Lake Superior Link).

Your letter states that the preliminary scope of the project consists of a new 398 kilometer, 230 kilovolt double-circuit transmission line along the northern shore of Lake Superior between Wawa and Thunder Bay. The proposed project would parallel the existing Hydro One tie between Lakehead Transmission Station and the Wawa Transmission Station.

The Ministry of Energy has reviewed the information provided relative to its current understanding of the interests of First Nation and Métis communities in the area and has determined that it may have the potential to affect First Nation and Métis communities who hold or claim Aboriginal or treaty rights protected under Section 35 of Canada's *Constitution Act* 1982.

The Ministry of Energy is delegating the procedural aspects of consultation and the Ministry of Energy expects that Hydro One will undertake the procedural aspects of consultation, consistent with the responsibilities outlined in the Memorandum of Understanding (MOU) signed between Ontario, represented by the Minister of Energy, and Hydro One, in September 2016. Please note that these consultation obligations are in addition to the consultation requirements imposed under the *Environmental Assessment Act* and further

clarified in the 'Consultation in Ontario's Environmental Assessment Process' Code of Practice as well as the 'Preparing and Reviewing Environmental Assessments in Ontario' Code of Practice.

Per section 8.1 of the MOU, the MOU and Schedule 'A' may be amended in writing at any time by the agreement of the Parties. The Ministry of Energy proposes an amendment to the MOU to include the following project description:

2. East West Tie Transmission Line (Lake Superior Link)

The East West Tie Transmission Line Project is added to this schedule consistent with the 2013 Long-Term Energy Plan, the Order in Council 326/2016 and the December 2017 Updated Assessment of the Need for the East-West Tie Expansion conducted by the IESO, which confirms the East-West Tie, a new transmission line roughly parallel to the existing transmission line that extends between Wawa and Thunder Bay, as the recommended option for maintaining a reliable and cost-effective supply to Northwest Ontario for the long term.

Per Sections 2.2(c) and 3 of the MOU, the Ministry of Energy also wishes to clarify that for the purposes of the Environmental Assessment under Part II of the *Environmental Assessment Act*, the Ministry of the Environment and Climate Change assumes primary responsibility, on behalf of the Crown, for items (c), (d), (e), (g), (h) under Section 3.2 of the MOU.

Based on the Crown's assessment of First Nation and Métis community rights and project impacts, the following Aboriginal communities should be consulted on the basis that they have or may have constitutionally protected Aboriginal or treaty rights that may be adversely affected by the Project:

Community	Mailing Address
Animbiigoo Zaagi'igan Anishnaabek First Nation (Lake Nipigon Ojibway)	204 Main Street, PO Box 120 Beardmore, ON P0T 1G0
Biinjitiwaabik Zaaging Anishinaabek First Nation (Rocky Bay)	General Delivery MacDiarmid, ON P0T 2B0
Biigtigong Nishnaabeg	PO Box 193, 78 Pic River Road Heron Bay, ON P0T 1R0
Bingwi Neyaashi Anishinaabek (Sand Point First Nation)	146 S. Court Street Thunder Bay, ON P7B 2X6
Fort William First Nation	90 Anemki Place, Suite 200 Fort William First Nation, ON P7J 1L3
Ginoogaming First Nation	PO Box 89, 101 Poplar Crescent Long Lac, ON P0T 2A0
Long Lake #58 First Nation	209 Otter Street, PO Box 609 Long Lac, ON P0T 2A0
Michipicoten First Nation	107 Hiawatha Drive, Box 1, Site 8, RR#1 Wawa, ON P0S 1K0
Missanabie Cree First Nation	174B, Hwy. 17E, Bell's Point Garden River, ON P6A 6Z1
Ojibways of Batchewana	236 Frontenac Street, Rankin Reserve 15D

	Sault Ste. Marie, ON P6A 5K9
Ojibways of Garden River	7 Shingwauk Street Garden River, ON P6A 6Z8
Pays Plat First Nation	10 Central Place Pays Plat, ON P0T 3C0
Pic Mobert First Nation	PO Box 717 Mobert, ON P0M 2J0
Red Rock Indian Band (Lake Helen)	Box #1030 Nipigon, ON P0T 2J0
MNO Greenstone Métis Council*	PO Box 825, 211-401R 4th Ave Geraldton, ON P0T 1M0
Red Sky Métis Independent Nation	406 East Victoria Ave Thunder Bay, ON P7C 1A5
MNO Superior North Shore Métis Council*	26 Princess Street Terrace Bay, ON P0T 2W0
MNO Thunder Bay Métis Council*	226 May Street South Thunder Bay, ON P7E 1B4

** Please copy MNO head office on correspondence to MNO regional councils:

Métis Consultation Unit
Métis Nation of Ontario Head Office
500 Old St. Patrick Street, Unit D, Ottawa, Ontario, K1N 9G4
Fax: (613) 725-4225

This rights-based consultation list is based on information that is subject to change. First Nation and Métis communities may make new rights assertions at any time, and other developments (e.g. the discovery of Aboriginal archaeological sites) can occur that may require additional First Nation and/or Métis communities to be notified and/or consulted. If you become aware of potential rights impact on communities that are not listed above at any stage of the consultation and approval process, kindly bring this to the attention of the Ministry of Energy with any supporting information regarding the claim. The Ministry of Energy will then assess whether it is necessary to include the community on the rights-based consultation list above.

If you have any questions about this letter or require any additional information, please contact Shannon McCabe at 416-212-6704 or shannon.mccabe@ontario.ca

Sincerely,



Samir Adkar
Director
Energy Networks and Indigenous Policy

C: Elise Cross Director, Environmental Services Hydro One Networks Inc.

Hydro One Networks Inc.
483 Bay Street
South Tower - 6th floor
Toronto, Ontario M5G 2P5
www.HydroOne.com
Christine.Goulais@HydroOne.com



Christine Goulais
Senior Manager
Indigenous Relations

May 24, 2018

Insert Contact Information

Dear Chief *Insert Name*:

Hydro One Networks Inc. (Hydro One) has initiated the Terms of Reference for an Environmental Assessment (EA) under the Ontario *Environmental Assessment Act* for the proposed Lake Superior Link project. The Independent Electricity System Operator's (IESO) Updated Assessment of the Need for the East-West Tie Expansion, 2017 states that a new transmission line "...continues to be the recommended alternative to maintaining a reliable and cost-effective supply of electricity in Northwestern Ontario for the long term." The EA will consider two route alternatives for a new double-circuit 230 kilovolt transmission line between Lakehead Transformer Station (TS) near Thunder Bay and Wawa TS near Wawa.

The attached Notice of Commencement and invitation to Community Information Centres will be published in local newspapers leading up to the June Community Information Centres.

We are committed to meeting with you and your community to share information about our proposed Lake Superior Link project. Please reach out to Tausha Esquega at (807) 346-3830 or Tausha.Esquega@HydroOne.com or Bruce Hopper at (416) 779-0257 or Bruce.Hopper@HydroOne.com if you have any questions or would like to coordinate a meeting.

Miigwetch,

Christine Goulais
Senior Manager
Hydro One Networks Inc.

Attachment



Hydro One Networks Inc.
483 Bay Street
South Tower – 6th floor
Toronto, Ontario M5G 2P5
www.HydroOne.com
Christine.Goulais@HydroOne.com

Christine Goulais
Senior Manager
Indigenous Relations

June 8, 2018

Insert Contact Information

Dear Chief *Insert Name*:

Hydro One Networks Inc. (Hydro One) has published a draft Terms of Reference (ToR) for an Environmental Assessment (EA) under the Ontario *Environmental Assessment Act* for the proposed Lake Superior Link project. The draft ToR document is open for review and public comment from June 11, 2018 to July 10, 2018.

The ToR sets out the framework and work plan for addressing Environmental Assessment Act requirements when preparing the EA, including an outline of the studies and consultation activities that will be undertaken. Important elements of this work will be to evaluate the reference route and reference route alternative, assess potential effects and determine measures to reduce or mitigate these effects.

Indigenous communities, government agencies, municipal officials, members of the public and other interested persons are encouraged to actively participate in the planning process. The draft ToR document can be reviewed on Hydro One's Lake Superior Link Project page www.HydroOne.com/LakeSuperiorLink. A physical copy of the document will be delivered to your office the week of June 11, 2018 for review as well.

Comments, inquiries and requests for additional information can be directed to Hydro One via telephone 1-877-345-6799 or email Community.Relations@HydroOne.com. Alternatively you can contact Tausha Esquega, Senior Advisor, Indigenous Relations at (807) 346-3830 or Tausha.Esquega@HydroOne.com.

Upon completion of the ToR, the document will be submitted to the Minister of the Environment and Climate Change (Minister) for review and decision. If approved by the Minister, the EA will proceed as outlined in the ToR. If you have further questions, please contact us.

Miigwetch,

Christine Goulais
Senior Manager
Hydro One Networks Inc.

From: Vicky.Woodbeck@HydroOne.com
To: *Insert Contact Email*
Subject: Terms of Reference for an Environmental Assessment
Date: June 11, 2018
Attachments: [Draft of LSL ToR 11jun2018.pdf](#)

Good afternoon,

Please find the attached Hydro One Networks Inc. draft Terms of Reference (ToR) as a follow up from the letter that was sent out on Friday, June 8, 2018.

Miigwetch.

Vicky Woodbeck
Coordinator, Indigenous Relations TB-2
Hydro One Networks Inc.
Tel: (807) 346-3838
Cell: (807) 356-2807
Email: Vicky.Woodbeck@HydroOne.com

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www.HydroOne.com
Christine.Goulais@HydroOne.com



Christine Goulais
Senior Manager
Indigenous Relations

May 18, 2018

Insert Contact Information

Dear Chief *Insert Name*:

Hydro One Networks Inc. (Hydro One) will be commencing environmental field studies in support of an Environmental Assessment (EA) for the proposed Lake Superior Link project (the Project). The Project is a new 400 km, double-circuit 230 kilovolt transmission line between Lakehead Transformer Station (TS) near Thunder Bay and Wawa TS near Wawa. We have attached a map for your reference.

Environmental studies in support of the EA will be conducted during the summer of 2018. All studies will be limited to the reference route and reference route alternative, including proposed access routes, fly yards and laydown areas.

Hydro One would like to consult with you and your community on the implementation of these environmental field studies. If you or your community is interested in participating in consultation on environmental studies please contact us by June 5th, 2018 to arrange a time to meet.

For any questions or inquiries that you may have, please contact Tausha Esquega, Indigenous Relations at Tausha.Esquega@HydroOne.com or (807) 346-3830. Alternatively, you can contact Bruce Hopper at (416) 779-0257 or Bruce.Hopper@HydroOne.com.

Miigwetch,

Christine Goulais
Senior Manager
Hydro One Networks Inc.

Attachment

June 29, 2018

Insert Contact Information

RE: Lake Superior Link Stage 1 and 2 Archaeological Assessments, Project Introduction and Invitation to Participate.

Dear Chief *Insert Name*:

Archaeological Research Associates Ltd. (ARA) appreciates the opportunity to introduce ourselves and the Stage 1 and 2 archaeological assessments of the proposed Lake Superior Link (LSL) project. The project extends from the municipality of Shuniah east of Thunder Bay to east of the Municipality of Wawa in the Districts of Thunder Bay and Algoma.

ARA has been contracted by Hydro One Networks Inc. to conduct the archaeological assessments required for the proposed (LSL) project. We would like to take this time to invite your community to participate in the archaeological assessments by providing (at your discretion) information regarding sacred or spiritual sites, undocumented archaeological sites, sites of value to the community or historical background information of the study area for inclusion in the Stage 1 report and/or by sending a representative to participate in the Stage 2 fieldwork surveys within your Treaty and Traditional Territory. We would also like to welcome your community to perform any ceremonies that might be required prior to, during or at the completion of the study.

1.1 PROJECT BACKGROUND

The project was initiated in 2013 when the Ontario Energy Board (OEB) awarded the role of “Designated Transmitter” for the development phase of the East-West Tie (EWT) to Upper Canada Transmission Ltd. (NextBridge). NextBridge recently completed an Individual Environmental Assessment (EA) for their preferred route for the EWT Transmission Line.

Hydro One is competing for the next phase (Leave to Construct) of the project to design, build and operate the approximately 400 km in length transmission line (230 kV) along the north shore of Lake Superior. Hydro One will be undertaking engagement and studies for the alternative LSL

route, including the archaeological assessment of previously unassessed lands to meet the requirements of the Environmental Assessment Act.

A large portion of the proposed LSL route has been subject to previous archaeological assessment. Specifically, in 2014 Scarlett Janusas Archaeology Inc. (SJA) completed a Stage 1 archaeological assessment for the New East-West Tie Transmission Line. The results of this assessment are documented in, “Stage 1 Archaeological Assessment, New East-West Tie Transmission Line, Multiple Lots and Concessions, District of Thunder Bay and Algoma”, PIF #P027-0245-2014. This assessment, carried out on behalf of NextBridge, considered the 400 km reference route (following the existing Hydro One corridor for the purposes of twinning the corridors) and two alternate routes around Pays Plat and Michipicoten First Nation Reserves. In 2016, SJA completed a second assessment, “Stage 1 Archaeological Assessment, New East-West Tie Transmission Line White River Preliminary Preferred Route”, PIF #P027-0282-2016. The White River preferred route considered a 56 km transmission line that diverts from the original proposed transmission line to avoid Pukaskwa National Park (PNP). In 2016, Golder Associates Ltd. (Golder) was retained by NextBridge to undertake, “Stage 1 Archaeological Assessment, EWT Access Roads, Construction Camps, Laydown Yards and Loon Lake Route Refinement, Districts of Thunder Bay and Algoma, Ontario”, PIF#1056-0074-2016. This assessment identified the proposed 64 m wide project footprint and associated infrastructure. In 2017, Stantec Consulting Ltd. (Stantec) was contracted to undertake three (3) Stage 1 assessments for additional lands within Segment 1, Segment 2, and Segment 3, under PIF#’s P1084-0042-2017, P1084-0040-2017, and P1084-0041-2017 respectively. Stantec also conducted the Stage 2 archaeological assessment of the preferred NextBridge EWT Transmission Line route under PIF #P1084-0037-2017.

The Hydro One route that is the subject of ARA’s Stage 1 and 2 archaeological assessments represents a modification to the NextBridge preferred route. This proposal considers the Stage 2 archaeological assessment of areas of archaeological potential that have not been subject to previous Stage 2 assessment and that will be affected by development (i.e., tower bases/structure locations, laydown areas, staging areas, access roads, and related infrastructure). As requested by Hydro One, the LSL alternative route has been considered in three distinct parts (See attached Map):

1. Dorion By-Pass – A 57.11 km length of corridor, 46 m in width, through greenfield around the Dorion, Ouimet Canyon and Loon Lake area. Hydro One’s and Next Bridge’s routes each follow the general alignment; however, their paths, tower locations, and access do not overlap, except at one tower location.
2. Pukaskwa National Park – An approximately 35 km length of corridor through Pukaskwa National Park (PNP). Hydro One currently owns and operates the existing transmission

line through PNP. The existing towers will be modified to accommodate additional circuits. No widening of the corridor will be required, and access will be done using helicopters. The only potential impacts will result from the drilling of four guy wire rock anchors at the base of each structure. In areas of archaeological potential, ARA has assumed a Stage 2 assessment area of 25 x 25 m, centred on the existing tower.

3. Twinning of the Existing EWT Corridor – Hydro One will be twinning the existing EWT corridor, similar to what was proposed in NextBridge’s EA, with the exception of the two previously mentioned areas. Hydro One’s corridor will be 37 m in width, whereas NextBridge’s corridor was 64 m in width. This part considers any areas where tower and access locations differ from the areas assessed in NextBridge’s EA, resulting in additional Stage 1 and 2 assessment requirements.

2.0 COMPANY PROFILE

Established in 1972, ARA is Ontario’s oldest archaeological and heritage consulting firm. Our longevity flows from the experience of our staff and our ongoing commitment to excellence and customer service. Over the past 45 years, ARA has completed hundreds of contracts for clients in the public, private, and not-for-profit sectors across Ontario. Our founder, Dr. Dean Knight, serves as both a Principal of ARA and a Professor Emeritus of Archaeology at Wilfrid Laurier University (WLU), Ontario’s premier venue for postsecondary education in archaeology. The close relationship between ARA and WLU has meant that ARA has consistently been staffed with the best and brightest archaeologists and heritage specialists in Ontario.

ARA’s head office is in the City of Kitchener where it maintains a full-time staff of 27 researchers, technical writers, GIS technicians, laboratory technicians, field archaeologists and heritage specialists. An additional 65 interns, consisting of R-licenced Field Directors, university graduates with degrees in Archaeology, and other highly trained individuals are seasonally employed (usually from April to November) on field projects. Smaller satellite offices are also maintained in the Cities of Brantford, Burlington and Hamilton. ARA values cross training of individuals, affording everyone the opportunity and means to step into different roles and takeover seamlessly should unforeseen events arise.

ARA is one of the few firms in Ontario that offers both archaeological and heritage services. Where possible, these assessments are conducted in parallel to provide a holistic approach to examining cultural heritage value above and below the ground. Combining archaeology and heritage also creates efficiencies, allowing background research to be completed in a timely and more cost-effective manner.

ARA has also taken a leading role among archaeological consulting firms in training Indigenous peoples as both field staff and archaeological monitors. It is a core value of ARA that no one could have greater respect for First Nations archaeology than an Indigenous person. Having Indigenous input and perspective provide insight into the project that is unparalleled.

Our Archaeology Department offers a variety of services including: Stage 1-4 Archaeological Assessments, Archaeological Construction Monitoring, Archaeological Management Plans, Cemetery Investigations, Burial Recovery and Relocation, Collections Management, Geomatics and GIS Services, Remote Sensing, and Preservation/Conservation Services. In the course of doing business, ARA has amassed considerable experience working with private landowners, proponents, developers, municipalities, crown corporations, and both federal and provincial clients. The resultant contracts were carried out for public, private, and not-for-profit sectors in accordance with a number of legislative frameworks. These include the Aggregate Resources Act, the Environmental Assessment Act (e.g., Class Environmental Assessments), the Funeral, Burial and Cremations Services Act, the Green Energy Act (e.g., Renewable Energy Approvals), the Planning Act, the Ontario Energy Board Act and the Ontario Heritage Act. ARA is registered with RAQS (MTO) under the *Environmental – Archaeology/Heritage* specialty and is currently a Vendor of Record for Hydro One Networks Inc., Infrastructure Ontario, Metrolinx and the Ministry of Transportation (MTO).

3.0 SCOPE OF WORK

3.1 Methodology

ARA will provide its services to undertake an archaeological investigation in accordance with the Ministry of Tourism, Culture and Sport's current *Standards and Guidelines for Consultant Archaeologists* (2011). The methods used for archaeological assessments in Ontario are laid out in a series of increasingly involved stages, including background study (Stage 1), property assessment (Stage 2), site-specific assessment (Stage 3) and mitigation of development impacts (Stage 4). For the proposed project, the archaeological investigation will comprise Stage 1 and 2 archaeological assessments.

3.1.1 Stage 1 Archaeological Assessment

The Stage 1 assessment will consist of comprehensive background research into all previously unassessed lands within the project footprint. This is accomplished through an examination of the

archaeology, history, geography and current land conditions in the vicinity of the project lands. This stage also generates an inventory of known archaeological sites within 1 km and previous archaeological fieldwork results within 50 m of the study area, which are used to assist in predicting zones of archaeological potential. Sources utilized during a background study include archival sources (e.g., historical publications and records), current academic and archaeological publications (e.g., archaeological studies, reports and management plans), modern topographic maps, recent satellite imagery, historical maps/atlasses and the MTCS's Ontario Archaeological Sites Database (OASD).

In keeping with the previous EA, areas of archaeological potential will be considered within 50 m of streams with a stream order of 3 or greater, within 50 m of present-day lake shores and with 150 m of glacial shorelines, areas of well-drained soils, previously registered archaeological sites, known historic settlements or cemeteries, and historic roadways or transportation routes.

In keeping with its core values, ARA welcomes your input on the project. If your community would like us to include information regarding sacred or spiritual sites, undocumented archaeological sites, sites of value to the community or historical background information of the area for inclusion in the Stage 1 portion of the project, we will collect and review your submissions. If you would like to submit any background information please notify us of your intent by **July 11, 2018** and provide us with your submissions by **August 15, 2018**.

The results of ARA's background research as well as the analysis and evaluation of the study area's archaeological potential will form appropriate recommendations (i.e., no further work in areas of no archaeological potential and Stage 2 property survey for all areas of archaeological potential).

3.1.2 Stage 2 Archaeological Assessment

The Stage 2 assessment will be conducted in order to document any archaeological resources that may be present in the areas of archaeological potential. As the majority of the project lands have been previously subject to Stage 1 assessments, recommendations for the Stage 2 assessment have been documented and accepted by the MTCS. A summary of these recommendations is as follows:

- Where the identified feature of archaeological potential is a modern water source, project lands will be tested at an interval of 5 m between 0 and 50 m of the feature. Survey is not required beyond 50 m.
- Features of archaeological potential other than modern water sources (i.e., elevated topography, pockets of well-drained soil, distinctive landforms, glacial shorelines, historic settlements, etc.) are to be tested at 5 m intervals between 0 and 50 m from the feature of

potential and those parts of the project lands that are between 50 and 150 m from features of archaeological potential are to be examined at 10 m intervals. Survey is not required beyond 150 m.

- Where exposed bedrock is encountered in an area of archaeological potential, the area must be visually inspected at a 5 m interval for evidence of cultural modification.
- No further archaeological assessment for areas identified as having “no” or “low” archaeological potential.

These recommendations are consistent with Section 2.1.5, “Alternative strategies for special survey conditions: Test pit survey in northern Ontario and on Canadian Shield terrain”, of the MTCS’ *Standards and Guidelines for Consultant Archaeologists (S&Gs)*.

The geography of Northern Ontario presents geographic constraints which are distinct from the south. Given the largely bedrock-controlled topography, a mosaic of ground conditions is commonly encountered in the north, often with rapid transitions between ecosites. As a result, the areas usually considered to exhibit archaeological potential (e.g., well-drained level terrain nearby past or present water which would have been navigable by canoe), are often found as pockets, or discontinuous areas, situated among areas considered to have low archaeological potential. These are best described as areas of complex archaeological potential. Remote sensing, while making earth visualisation viable to a degree not before possible, regularly fails to illustrate the nuances of the landscape and the variability of ground conditions. As a result, it is felt that a portion of those areas defined as having archaeological potential will be refined during the Stage 2 work.

Generally, the terrain and access of Northern Ontario is not conducive to moving large numbers of people from one area of potential to another. Our experience suggests that archaeological work in the north is best performed by small groups of highly trained professionals. This approach can increase the rate of data collection and documentation, while at the same time testing areas of archaeological potential efficiently.

Using the test pit method, crew members will hand-excavate small regular test pits with a minimum diameter of 30 cm at prescribed intervals across the study area. The resultant pits will then be examined for stratigraphy, cultural features and/or evidence of fill, and the soils will be screened for archaeological materials. If archaeological materials are encountered over the course of the test pit survey, each positive test pit (PTP) will be documented and all artifacts will be collected according to their associated test pit. All test pits will be backfilled upon completion.

Artifacts that may indicate the presence of significant cultural deposits include bone, charcoal, lithics (stone tools and refuse generated by their production and use), ceramics, glass and metal. If found, with authorization from the affected First Nation, these artifacts will be retained and subject to detailed laboratory analysis. Following analysis, a recommendation will be made as to the cultural heritage value or interest (CHVI) of any identified sites. Further work (i.e., Stage 3 site-specific assessment) or avoidance and protection may be recommended. If no archaeological resources are identified during the assessment, a recommendation of no further work will be made to the MTCS.

In reviewing the proposed routing for this project, ARA has determined that there are six areas where the proposed Lake Superior Link project diverges from the preferred EWT corridor. ARA has divided the project into three (3) distinct parts: 1) Dorion By-Pass, 2) Pukaskwa National Park, and 3) Twinning of the Existing EWT Corridor. A preliminary breakdown of the proposed part locations, the area/corridor width, associated structure numbers, total amount of archaeological potential identified within each part and number of structure numbers in areas of archaeological potential is provided in Table 1 below.

Table 1: Proposed Corridor Division and Areas of Potential

Part #	Location	Area	Structure Numbers	Total Archaeological Potential in the Proposed Corridor	# of Structures within Areas of Potential
Part 1	Dorion By-Pass	Corridor Width – 46 m	T1054 – T893 (162)	57.3 ha (141.6 ac)	31
Part 2	Pukaskwa National Park (PNP)	Tower Bases – 25 x25 m	T343 – T258 (87)	16 ha (40 ac)	11
Part 3	Lakehead TS to T1096	Corridor Width – 37 m	T1099 – T1096 (4)	22 ha (55 ac)	2
Part 3	North of Marathon	Corridor Width – 37 m	T465 – T458 (6)	4.6 ha (11.3 ac)	7
Part 3	East of Marathon to West of PNP	Corridor Width – 37 m	T437 – T344 (94)	24.8 ha (61.3 ac)	11
Part 3	East of PNP – Wawa TS	Corridor Width – 37 m	T256 – T208 (49)	10.3 ha (25.4 ac)	2
				100.8 ha (249.1 ac)	65

ARA has estimated that an average crew can assess approximately 1.4 ha/day, **depending on access**. In keeping with the previous EA, this is based on the assumption that all areas of archaeological potential within the Lake Superior Link corridor where it diverges from the preferred EWT corridor will require assessment. The exception is on lands through Pukaskwa National Park where there will be no widening of the existing Hydro One corridor. Proposed work

would be limited to the renewal/modification of the existing structures (87) for the addition of guy wire and anchor supports. For the purposes of this proposal, ARA has assumed that Stage 2 assessment will be required for the specific work areas (i.e., 25 m x 25 m) around the 17 existing structures that are located in areas of archaeological potential. ARA has not considered additional assessment for access roads or related infrastructure through the PNP. MTCS consultation would be required to confirm this assessment strategy. For this proposal, ARA has estimated that a total area of 100.8 ha (249.1 ac), will require assessment for the twinning of the EWT corridor Parts 1– 3.

Based on the recent mapping provided, the total length of new or upgraded access roads as part of the Lake Superior Link project is 181.3 km. ARA has identified approximately 6.0 km of new or upgraded access roads within the previous Stage 1 limits that requires Stage 2 assessment for the project. It is estimated that once the detailed desktop gap analysis for previously completed Stage 1 and Stage 2 AA studies is complete up to 15 km of access roads could require assessment. In keeping with the previous EA, ARA has assumed access roads will be 20 m in width amounting to a total area of 30.0 ha (74.1 ac).

In reviewing the provided project mapping, ARA has also identified a total of 7 Pull Sites and Fly Yards in areas of archaeological potential. Identified areas of archaeological potential at these sites comprise a total of 13.3 ha (32.0 ac).

Table 2: Total Area Requiring Assessment

Infrastructure	Total Archaeological Potential
Corridor - Parts 1-3	100.8 ha (249.1 ac)
Access Roads	30.0 ha (74.1 ac)
Pull Sites/Fly Yards	13.3 ha (32.0 ac)
Total	144.1 ha (355.2 ac)

Overall, ARA has assumed that a total of 144.1 ha (355.2 ac) of land will require assessment for this project. These lands will be subject to assessment in accordance with Sections 2.1.5 and 2.1.6 of the MTCS’ *Standards and Guidelines for Consultant Archaeologists* as outlined in Section 3.1 and the previous assumptions and calculations have been used to determine the fieldwork schedule.

Based on ARA’s project assumptions, it has been determined that a single crew could assess Part 1 (the Dorion By-Pass) in 41 days, Part 2 (the PNP) in 6 days (Heli only), Part 3 (the twinning of the EWT) in 27 days (5 accessible and 22 Heli only), the access roads in 22 days and the Pull Sites/Fly Yards in 10 days. This is a total of 106 field days in optimal conditions.

Due to the project timelines, ARA has decided to dedicate 2 field crews of 6 people (1 Field Director and 5 Field Technicians) and 1 field crew of 3 people (1 Field Director and 2 Field Technicians) to complete the assessment over the course of 2 months. Fieldwork would be completed on a regular work week schedule with 10 hour days. In order to meet project timelines a six-day week is currently being considered. ARA anticipates that the fieldwork portion of this project will begin on July 23, 2018.

Thank you for taking the time to review the background information and the proposed workplan for the archaeological component of the Lake Superior Link project. At this time ARA would like to formally invite your community to participate in the project by providing historical information for our consideration and/or by sending a representative from your community to participate in the Stage 2 Field Surveys taking place within your Treaty and Traditional Lands. Fieldwork for the overall project is tentatively scheduled to begin on July 23, 2018 and will continue through to end of September 2018.

Please note that fieldwork will include long days in rough terrain. Representatives will be required to bring and wear appropriate PPE including hi-vis safety vest, high ankle steel toed boots, safety glasses and work gloves. Helmets will also be required when riding on UTVs and life jackets will be required any time boat access is required. Fire retardant clothing may be required when working in proximity to existing hydro towers but will be supplied by ARA if required. Additionally, the representative must be willing to travel in helicopters (sometimes being required to jump a short distance from the helicopter to land), UTV and boat/canoe where required.

Representatives should be prepared to follow ARA's Health and Safety Program or provide ARA with a copy of their own Health and Safety program that meets or exceeds that of ARA. The community will also need to provide ARA with a current copy of their WSIB certificate and general insurance certificate no later than July 13, 2018 if your representative wishes to begin on the first day of deployment.

If your community is interested in participating in the archaeological portion of this project please confirm your interest with Victoria Cafik by email (vcafik@arch-research.com) or by phone (519-212-5172) no later than **July 13, 2018**. Additional deployment details including specifics regarding scheduling, meeting locations, and crew contact info will be provided in late July after confirmation of your interest and in advance of the Stage 2 Field Surveys. Upon confirmation, please provide the following: 1) Contact info for the preferred community point of contact 2) WSIB certificate and Insurance certificates and 3) Specification of how your community would like to participate (by providing historical information and/or providing a representative to participate in the fieldwork, and/or performing any required ceremonies)

Rates for participating in the project will be defined in your consultation agreement with Hydro One Networks Inc. If no agreement is signed, Hydro One Networks Inc has outlined the following terms: Hydro One will pay the costs of one Environmental Monitor/ Observer provided by the Indigenous Party to participate. Funding will be limited to a maximum of \$75/hour for a qualified monitor and \$20/hour for a non-qualified monitor.

Regards,

Paul Racher, MA, CAHP, RPA
Principal - Management and Senior Review