

Government Services Building
22 Winookeedaa Road
Curve Lake, Ontario K0L1R0



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July 27th, 2021

Ms. Martine Chait-Hartwig
Deputy Clerk
Township of Douro-Dummer
(705)652-8392 ext. 210
martinac@dourodummer.on.ca

Dear Ms. Chait-Hartwig:

RE: Zoning By-Law Amendment #R-09-21, Wildfire Golf Club (c/o Glenn Stonehouse), Con 6, PT Lot 30 PT Road Allowance; Con 7 PT Lots 30 and 31 PT; Road Allowance Registered Plan 45R12362 Parts 1; To 6, Dummer Ward, Township of Douro-Dummer 2215 Wildfire Drive (Stony Lake)

Curve Lake First Nation Lands & Resources Consultation Department has received the notice concerning a new build for the above noted property. Curve Lake First Nation Consultation staff has reviewed the available information in accordance with our Aboriginal and treaty rights and we offer the following comments:

The request was to permit an exemption from an Archaeological Assessment and to waive concerns of the proposed storage area. As this area was covered in a previous Stage 2 assessment, and will not be impacted an area that has not been previously assessed (confirmed with township and previous archaeologist) we are agreeable to waive the assessment.

As the property is within 300m of Stony Lake, there is a high potential for archaeological resources to be present- this triggers the need for an archaeological assessment. However, given the previous assessment and discussion with the township and original archaeologist, there is no immediate concern for an archaeological assessment(s). If any **ground disturbances** (i.e. significant modification to portions not previously assessed) our original suggestion of an archaeological assessment still stands.

As well **should any changes to the location** of the proposed storage facility, causing the footprint to now be on an area adjacent to the assessed lands or an entirely different area of the property, the property owner(s) must follow the Ministry of Heritage, Sport, Tourism, and Culture Industries (MHSTCI) Criteria for Evaluating Archaeological Potential. Screening Questions #4 and #5 speak to Aboriginal knowledge or historically documented evidence of past Aboriginal use and if it is present then “you need to hire a licensed consultant archaeologist to undertake an archaeological assessment of your property.” Stony Lake has been used by the Michi Saagiig for thousands of years and is a significant place for travel and for fishing.

Indigenous people in the past tended to live close to water as well as bury their dead along shorelines and on islands. Several years ago, a property owner along the Trent River, while

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constructing an addition, dug into a burial mound with upwards of 25 bodies in it. This cost the property owner a substantial amount (6 figures) for the exhumation and the bodies have still not been reburied. We would like to avoid repeating that situation. Had the property owner completed a Stage 1-2 archaeological assessment, the burial mound would have been identified, avoided and protected – mitigating the impacts to Aboriginal rights and saving thousands of dollars. (A Stage 1-2 is typically under \$5000).

If the property that is the subject of this Zoning By-law Amendment (2215 Wildfire Drive, Dummer Ward) changes the current outlay of proposed development and still has not had a prior archaeological assessment, in light of the concerns raised above, Curve Lake First Nation's Consultation Department requests the following:

- 1) To have an archaeological assessment completed for the area that will be disturbed, which will be sent to the Township and forwarded to Curve Lake First Nation Consultation Department for comment.
- 2) To have a Curve Lake First Nation Liaison on-site for the archaeological assessment.

We strongly advise that an archaeological assessment be undertaken prior to any excavation – to protect both the property owner's interests and the rights of First Nations to protect cultural heritage.

Section 2.6.5 of the PPS 2020 indicates "Planning authorities shall engage with Indigenous communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources." And furthermore, Section 4.3 states that the "Provincial Policy Statement shall be implemented in a manner that is consistent with the recognition and affirmation of existing Aboriginal and treaty rights in section 35 of the *Constitution Act*, 1982."

Furthermore, the *Growth Plan for the Greater Golden Horseshoe 2017*, Section 4.2.7.2 states: "Municipalities will work with stakeholders, as well as First Nations and Metis communities, in developing and implementing official plan policies and strategies for the identification, wise use and management of cultural heritage resources."

If you have any questions or concerns please do not hesitate to contact Curve Lake First Nation's Consultation Department.

Sincerely,

Dr. Julie Kapyrka
Lands & Resources Consultation Officer
Curve Lake First Nation

Jordon MacArthur
Archaeological Program Administrator
Curve Lake First Nation