

Proposed Milton Quarry East Extension JART COMMENT SUMMARY TABLE – Cultural Heritage

Please accept the following as feedback from the Milton Quarry Joint Agency Review Team (JART). Fully addressing each comment below will help expedite the potential for resolutions of the consolidated JART objections and individual agency objections. **Additional, new comments may be provided once a response has been prepared to the comments raised below and additional information provided.**

	JART Comments (September 2022)	Reference	Source of Comment	Applicant Response (October 2022)	JART Response
Report/Date: Cultural Heritage Impact Assessment Report December 2021			MHBC		
1.	<p>CHIA review (MHBC)</p> <ul style="list-style-type: none"> PV - third paragraph needs grammatical editing. It is also noted that when asserting that the subject property does not include built heritage value or a significant cultural heritage landscape, Provincial terminology should be used - namely that it is not of cultural heritage value or interest P6 - 2.4 last paragraph. The subject lands have been identified by Provincial (Niagara Escarpment Plan) and UNESCO (Niagara Escarpment Biosphere Reserve) bodies within separate land-use planning and resource conservation mechanisms. While neither of these identify the Niagara Escarpment as a “protected heritage property” overall, recognition of the Niagara Escarpment by the NEP and UNESCO Niagara Escarpment Biosphere Reserve meet the PPS definition of Cultural Heritage Landscape by their inclusion on “an international register” and by being managed through another land use planning mechanism. The UNESCO Niagara Escarpment Biosphere Reserve explicitly acknowledges the Niagara Escarpment’s diverse landscapes under the category of Socio-Economic characteristics. As such, the acknowledgement of these properties within the NEP and UNESCO Niagara Escarpment Biosphere must be acknowledged and addressed. P6 - 2.6 - Policies of the NEP (2017) are only stated with no real analysis provided. This lack of analysis is not rectified within the Planning Justification Report. Specific responses to policies are needed: notably, to address cultural heritage landscape inventory gaps: therefore, the response provided to date warrants further documentation, evaluation, and analysis. Further, NEP Policies 2.9.3.b) and c) are not described or addressed in this study. P24 - 5.3, third paragraph. The assertion that the subject lands are not within a defined area that has been demonstrated to be valued by the community is preceded and contradicted by the inclusion of this area within the NEP and UNESCO Niagara Escarpment Biosphere. The association of the proposed expansion with the quarry operation responsible for "the Gap" often ascribed as providing early public impetus for the recognition of the Niagara Escarpment, passing of the NEPDA, formation of the NEC and development of the NEP lends further credence to the community interest in properties within the NEP. P25 - 5.4 - the conclusion drawn in this section is contradicted by the NEC comment on section 5.3, drawing attention to the inclusion of the subject property in the NEP and UNESCO Niagara Escarpment Biosphere. P28 - 7.1 - as a result of 5.3 and 5.4 comments, the assertions and conclusions made in 7.1 and 7.3 require redrafting to address NEC concerns identified. Notably, it is stated in a review of impacts that: <i>The area of the site proposed for aggregate extraction does not contain any built heritage resources or cultural heritage landscapes, therefore there are no direct or indirect impacts anticipated.</i> 	General	NEC Staff	<p>MHBC would like to meet with NEC Staff, JART Peer Reviewer (ASI) and the Town of Halton Hills Heritage Planner to discuss comments #1 and #4.</p> <p>The primary purpose of the Cultural Heritage Impact Assessment was to determine if the subject site contained an important built heritage resource or cultural heritage landscape that required protection. Archaeological resources were addressed in a separate technical report and this report was reviewed as relevant background information when completing this assessment. The other technical reports do not directly contribute to the understanding of the cultural heritage landscape of the area. Applicable information has been included and referenced in the Cultural Heritage Impact Assessment. As part of this assessment, MHBC conducted an appropriate level of research, site investigation and reviewed relevant historic information pertaining to the subject site and surrounding area to determine the cultural heritage value.</p> <p>Based on the JART review, it is our understanding that it is agreed that the subject site does not contain a built heritage resource. The JART reviewers have requested additional research to confirm the subject site does not contain a cultural heritage landscape requiring protection. It is clear from our research that this site does not represent a cultural heritage landscape that is valued by the community and warranting long term protection. The subject site does not contain any built features, is isolated, surrounded by existing approved aggregate operations, is small in size, does not have significant historical value, does not contain unique features and is typical of a rural agricultural landscape in this area of Ontario. Based on the assessment completed, MHBC is confident in our conclusion that this property</p>	

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	<p>NEC Staff contend this conclusion is premature given that a description and assessment of the cultural heritage landscape does not consider multiple components contained with the provided NEP and PPS definition that are present on and in proximity to the subject lands.</p> <ul style="list-style-type: none"> • P30 - similarly, sections 8.1 and 8.2 require redrafting to address the NEC concerns identified in Sections 5.3 and 5.4, 7.1 and 7.3. • P31 - similarly, section 9 requires redrafting to address the NEC concerns identified in Sections 5.3 and 5.4, 7.1, 7.3, 8.1 and 8.2. In general, the conclusions of the report are not shared by NEC Staff. Broadly, NEC Staff would identify that the definition of the cultural heritage resource provided by the NEP (2017) includes cultural heritage landscapes. Any broad conclusion made on the topic of cultural heritage resources needs to be supported by a better analysis of the cultural heritage landscape of the area as detailed in our comments. • General: <ul style="list-style-type: none"> ○ The following aspects of cultural heritage landscapes need to be explored in the Cultural Heritage Impact Assessment <ul style="list-style-type: none"> ▪ Heritage landscape as it relates to indigenous community history. The report identifies historic ties to the Anishnaabe and the Haudenosaunee peoples ▪ Heritage landscape as it relates to known archaeological sites identified in the submitted Stage 1-3 Archaeological Assessments ▪ Interrelationships between known archaeological sites, indigenous community heritage, and natural heritage features present in the study area. ▪ How the UNESCO designation applied to the properties affects the cultural heritage value of the area, as well as the principles of the Man in the biosphere program and how they apply to interrelationships of all aspects contained within the definition of cultural heritage landscapes provided by the NEP (2017). ▪ How the cultural heritage landscape is defined by existing viewsheds ○ Broadly, the report does not incorporate findings of other submitted reports (VIA, Archaeological, Planning, Natural Heritage) that directly contribute to the understanding of the cultural heritage landscape of the area. The VIA, Natural Heritage and Planning reports encompass natural and cultural landscape features that have a direct bearing on cultural heritage landscape values and are not discussed in this report. 			<p>does not contain a cultural heritage landscape requiring conservation. From our perspective, this site is an appropriate location to consider for an expansion to an existing mineral aggregate operation based on consideration of cultural heritage resources.</p> <p>In preparation of our original report, the policies, development criteria and definitions of the NEP were considered, however JART should refer to the MHBC Planning Report for a complete policy analysis of the Niagara Escarpment Plan.</p> <p>If the agencies have additional information about the subject site that has not been considered as part of the Cultural Heritage Impact Assessment, could you please provide this information to MHBC and we will determine if it impacts our conclusions in the report.</p> <p>In addition, please note the following:</p> <ul style="list-style-type: none"> • The PPS references identification by UNESCO as a world heritage site. This property has not been identified by UNESCO as a world heritage site. The World Heritage Site program is different from the World Biosphere Reserve program. The PPS definition referenced varies from the NEP definition of CHL, which specifically references the World Heritage Site program. CHL evaluation is carried out further in the report, and it was determined the properties do not constitute a significant CHL. Being within the Escarpment Plan Area does not necessarily mean a property is a significant cultural heritage landscape. . • Regarding the comment on the Gap, the Joint Board decision for the previous Milton Quarry extension in 2007 dealt with the Gap. There was a specific program/plan that was required and is still in progress to provide for screening the gap. This item is unrelated to the proposed Milton Quarry East Extension. The subject lands are also not currently related to the quarry operation. 	

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				<ul style="list-style-type: none"> Regarding the cultural heritage value of the subject site, Dufferin did have representatives of the First Nation community participate in the archaeology study of the subject site and there were no First Nation features identified warranting long term protection. 	
2.	<p>The C.H.I.A. prepared by M.H.B.C. generally presents appropriate background data, site survey information, and historical research results and outputs to identify known or potentially significant built heritage resources and cultural heritage landscapes. However, given that the report acknowledges that results of archaeological investigations suggest the former presence of buildings and human occupation at the site (M.H.B.C. 2021: 18), it is recommended that the range of historical maps reviewed should make an effort to present cartographic renderings of the site from the early twentieth century. This may include consultation of air photos records from the National Air Photo Library and/or National Topographic System maps that date to the first half of the twentieth century.</p> <p>Presentation of these supplementary maps would assist in presenting a more complete understanding of the site's evolution with respect to land use activities that occurred at the site during the late nineteenth and early twentieth centuries. Alternatively, documenting the property's chain of title, tax assessment records, agricultural returns, and or census data would also result in a more definitive understanding of what occurred on the property during the late nineteenth century and early twentieth century and whether there is additional evidence indicating that structures were constructed during this period. This exercise could further resolve conflicting statements in the C.H.I.A. that suggest the property never had structures despite the results of archaeological investigations recovering materials related to Euro-Canadian land use activities, including food and beverage-related and structural-related artifacts (Golder 2021:14, 18). This supplementary information and analysis may also provide additional context to further understand how and why a former farm lane is evidenced on the lot and provide additional data to support the evaluation findings presented in the M.H.B.C. C.H.I.A. that conclude there are no significant cultural heritage landscapes located on the subject site.</p>	General	Archaeological Services Inc.	<p>Noted, thank you.</p> <p>Regarding mapping, the report provides a level of detail that is typically used for such investigations, providing information related to mid-late 19th century, mid-20th century and recent airphotos. Based on the characteristics of the subject site, it is our opinion that additional review of historic maps in an effort to present cartographic renderings of the site from the early twentieth century is not necessary and would not change our overall conclusion.</p>	
3.	The C.H.I.A. prepared by M.H.B.C. presents an appropriate level of information to describe the existing conditions of the site.	General	Archaeological Services Inc.	Noted, thank you.	
4.	<p>The C.H.I.A. prepared by M.H.B.C. concludes that the subject lands proposed for licensing do not contain any built features. This conclusion is based on sound and complete information. The C.H.I.A. goes on to conclude that given the absence of buildings on the site, the property does not have any buildings that have cultural heritage value. This is an appropriate conclusion.</p> <p>The C.H.I.A. addresses landscape features on the site and discusses the presence of features that may be linked to earlier land uses, such as field patterns, former hedgerows, and a farm lane.</p> <p>The C.H.I.A. concludes that the subject lands are not considered a cultural heritage landscape because: they have not been demonstrated to be valued to the community; the site's historic integrity has been altered; and given that no buildings remain on the site (M.H.B.C. 2021:24-25). These conclusions are premature based on the data and</p>	General	Archaeological Services Inc.	<p>Noted, thank you.</p> <p>Noted, thank you.</p> <p>Please see response to #1 including a request for a meeting to discuss further. The level of detail and research efforts meet the requirements for conducting such study, and applicable inventory</p>	

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	<p>analysis presented in the report. There is no documentation that agencies such as the Niagara Escarpment Commission (N.E.C.), Town of Halton Hills Heritage Planner or representatives of the local Municipal Heritage Advisory Community were contacted to establish whether these lands have been defined as being a potential cultural heritage landscape of significance to a community. Additionally, the report does not evidence through historical map and aerial photograph reviews or comparative data, that the identified landscape features have been substantively altered. It is recommended that to augment the C.H.I.A.'s heritage evaluation, the C.H.I.A. should consider:</p> <ul style="list-style-type: none"> • contacting the Town of Halton Hills to confirm whether any community values have been ascribed to these lands; • Specific consultation with the N.E.C. should occur to further understand how the area proposed for licensing relates to the Niagara Escarpment policy provisions and existing analyses conducted by the Commission that have addressed key scenic and cultural heritage features that contribute to the Niagara Escarpment's cultural heritage landscape significance (for example, how has this area been assessed as part of past scenic valuation studies?). Related to this, and given that the area proposed for licensing is located within the Niagara Escarpment, the C.H.I.A. should more thoroughly integrate the results of other technical work such as natural heritage/ecological studies, visual impact assessments, and archaeological work to further address the site's known or potential interrelationships between these features. Additional policy analysis should also be included to analyze policy provisions of the Niagara Escarpment Commission and how those relate to the area proposed for licensing. • augmenting its historical map review to provide coverage from the early twentieth century; and • presentation of comparative examples of agricultural landscapes in the local area, or relevant primary and secondary source literature, to demonstrate that this remnant agricultural landscape is not a complete or compelling example of late nineteenth-century/early twentieth-century agricultural land-use patterns. 			<p>information was consulted when determining potential value of this site and nearby sites. Information was readily available online, so there was no need to consult further with staff.</p> <p>If there is additional information available regarding this area from the Town of Halton Hills or the NEC, the study team would welcome it being provided for review and consideration.</p> <p>As noted above, other studies were considered as relevant in the preparation of this work.</p> <p>As discussed, the team is amenable to conducting further research into other sources.</p> <p>It is unclear what the value of this work would be, given the type of features on the subject site. The site inventory and</p>	
5.	The C.H.I.A. provides a complete and sufficient description of the proposed development.	General	Archaeological Services Inc.	Noted, thank you.	
6.	<p>Based on the conclusions presented in the C.H.I.A., the impacts of the proposal have been appropriately measured.</p> <p>The peer reviewer does note that should identification and evaluation of cultural heritage resources on site change based on completion of the supplementary technical work recommended herein, the results of the impact assessment may require updating.</p>	General	Archaeological Services Inc.	<p>Noted, thank you.</p> <p>Noted, thank you.</p>	

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7.	<p>Based on the conclusions presented in the C.H.I.A., consideration of alternatives, mitigation and conservation methods have been appropriately addressed.</p> <p>The peer reviewer does note that should identification and evaluation of cultural heritage resources on site change based on completion of the supplementary technical work recommended herein, the results of the impact assessment may require updating.</p>	General	Archaeological Services Inc.	<p>Noted, thank you.</p> <p>Noted, thank you.</p>	
8.	<p>Based on the conclusions presented in the C.H.I.A., implementation and monitoring strategies have been appropriately addressed.</p> <p>The peer reviewer does note that should identification and evaluation of cultural heritage resources on site change based on completion of the supplementary technical work recommended herein, the results of the impact assessment may require updating.</p>	General	Archaeological Services Inc	<p>Noted, thank you.</p> <p>Noted, thank you.</p>	
9.	<p>Based on the conclusions presented in the C.H.I.A., the summary statement and conservation recommendations have been appropriately addressed.</p> <p>The peer reviewer does note that should identification and evaluation of cultural heritage resources on site change based on completion of the supplementary technical work recommended herein, the results of the impact assessment may require updating.</p>	General	Archaeological Services Inc	<p>Noted, thank you.</p> <p>Noted, thank you.</p>	