



TECHNICAL MEMORANDUM

To: Gordon Dickson, MCIP, RPP, Senior Planner, Community Planning Department, City of Burlington

From: Christienne Uchiyama, MA, CAHP, Principal, Manager – Heritage Consulting Services,
Letourneau Heritage Consulting Inc.

Date: 19 October 2020

Re: Nelson Quarry Application(s) to change the Official Plan designation to “Mineral Resource Extraction Area” to permit the extraction of aggregate materials on the subject lands

Further to our review dated LHC has conducted a review of the following report submitted as part of the above noted application:

- Stage 1-2 Archaeological Assessment, prepared by Golder Associates Ltd. (Golder) dated 15 September 2020.

This report is subsequent to the Stage 1-2 Archaeological Assessment Interim Report, prepared by Golder dated 23 March 2020.

Relevant sections of the following reports were also reviewed as part of the process:

- Planning Justification Report & Aggregate Resources Act Summary Statement Burlington Quarry Extension, prepared by MHBC dated April 2020; and,
- Stage 1-2 Archaeological Assessment Terms of Reference for the Proposed West Extension of the Burlington Quarry, prepared by Golder dated February 2020.

In providing this review, the author has been guided by the following:

- Ontario Heritage Act, 1990;
- Provincial Policy Statement, 2020;
- Planning Act, 1990;
- Standards and Guidelines for Consultant Archaeologists (MHSTCI, 2011);
- The Archaeology of Rural Historic Farmsteads, A DRAFT Technical Bulletin for Consultant Archaeologists in Ontario (MHSTCI, 2014);
- Official Plan of the Burlington Planning Area (2019);
- Niagara Escarpment Plan (2017, 2020 consolidation);
- Halton Region Official Plan (2018 consolidation);
- Aggregate Resources Reference Manual (Halton, n.d.); and,
- Master Plan of Archaeological Resources of the Regional Municipality of Halton (2008 update).

1.0 FINDINGS

The following provides a summary of the key findings related to deficiencies with the Stage 1-2 Archaeological Assessment, prepared by Golder Associates Ltd. (Golder) dated September 2020 (herein the Stage 1-2 AA).

- a) The Interim Stage 1-2 AA fails to take into account the study area's location on the Mount Nemo Plateau and incorrectly states the study area's location in relation to the Escarpment (see Section 1.4.2).
- b) It unclear why the earlier archaeological assessments undertaken for the South Extension Lands were not reviewed as part of the assessment and why, although more than 300 m from the current West Extension Lands study area, the previously identified sites were not considered to be indicators of archaeological potential, given the setting and their likely relevance to the archaeological potential of the West Extension Lands.
- c) The descriptions of AiGx-238 and AiGx-239 (Table 3) do not correspond with their descriptions in the Stage 4 AA prepared by Archaeologix in 2004.

The identification of areas of archaeological potential appears to have captured all undisturbed lands within the study area in conformance with the *Standards and Guidelines for Consultant Archaeologists (S&Gs)*.

The Stage 1-2 AA resulted in the identification of one (1) Euro-Canadian historical archaeological site dating from circa 1850s to the early 20th century. This site has been registered as Inglehart-Harbottle and assigned the Borden number AiGx-462. A total of 1,074 artifacts were recovered from 18 positive test pits (seven of these being intensified pits at 2.5 m intervals around one of the positive test pits) and one test unit. The positive test pits were distributed over an area measuring approximately 40 m (north-south) by 20 m (east-west). Analysis of the assemblage dated four of the artifacts to the 20th century and a total of 27 artifacts were faunal material.

The Stage 1-2 AA applies the MHSTCI's 2014 Rural Historical Farmsteads bulletin (the bulletin) to its determination of the Cultural Heritage Value or Interest (CHVI) of the site, recommending no Stage 3 AA because: approximately 33% of the site dates to before 1870; the site have been continuously occupied since c.1850 (the historical background information presented in Section 4.4.1 of the Stage 1-2 AA dates the earliest occupation to 1844); additional historical research was presented in the Stage 1-2 AA; and, the survey was intensified through the excavation of a test unit and eight additional test pits at 2.5 m intervals around one of the positive test pits.

Based on our review, LHC identified the following concerns with the report and its findings:

1. Approximately 33% of the site dates before 1870 (Executive Summary and Section 4.5 Conclusions).

The Stage 1-2 AA determines that no Stage 3 AA is required because less than 80% of the assemblage dates to before 1870 and states that 33% of the site dates to pre-1870. Although several diagnostic artifacts and artifact types and their dates of manufacture or popularity are discussed in Section 3.2 of the Stage 1-2 AA, very few examples are securely dateable and the analysis that resulted in the determination that approximately 33% of the assemblage is pre-1870 is not presented.

Per Section 6.1 of the bulletin some examples of characteristics of an assemblage that might support the argument that the site is of no further CHVI include:

- Many of the artifacts in the assemblage could be dated to either the 19th or 20th century, but there are only a few artifacts which can be clearly attributed to only the early to mid-19th century
- The artifacts are all or mostly from one item (e.g., 20 fragments from one vessel)
- The artifacts datable to the early to mid-19th century are widely spatially dispersed within a larger distribution of later-dated artifacts without evidence of a cluster of the earlier-dated 19th century artifacts within the overall distribution
- The earlier-dated 19th century artifacts form a very small proportion of the total assemblage

2. ...the site has no further cultural heritage value or interest...

Per the bulletin,

The ministry expects the available evidence to be incorporated into the report to make a recommendation of no further CHVI. This includes:

- an analysis of the complete artifact assemblage (see comment 1, above)
- **all available historical documentation**
- **any information from extant built heritage**
- **the local and regional context**
- **any information regarding site integrity**

Additional information is missing from the analysis presented in the Stage 1-2 AA which would support the finding that AiGx-462 The conclusions further state that “the Inglehart family is not affiliated with the early settlement of Nelson Township”; however, this assertion has been made without taking into account the historical context of the site with respect to its location on the Mount Nemo Plateau. The local context has thus not been taken into consideration in the determination of the site’s CHVI.

Furthermore, the site’s integrity and its dense distribution of the artifacts have not been addressed in the analysis or recommendations, nor does the Stage 1-2 AA make any reference to how the location of the test unit was selected or how the boundaries of the site were determined.

With respect to the distribution of artifacts, supplemental documentation was not submitted with the Stage 1-2 AA, so test pit locations cannot be cross-referenced with counts from the catalogue. It is, therefore, unclear why this specific positive test pit was selected for intensification and test unit excavation and not one or more of the other ten positive test pits, as this is not addressed in Section 2.0 Field Methods. Although it is not necessary to excavate more than one test unit where multiple positive test pits are encountered, the decision to excavate only one test unit over one positive test pit should be justified in the Stage 1-2 AA. Per the bulletin, Test unit placement should be determined by:

- the distribution of artifacts including concentrations of earlier dating artifacts or activity areas;
- test pits that provide information about site integrity; and,
- the most productive test pits.

Finally, the Stage 1-2 AA provides no commentary on the presence of occupation-specific features, strata or middens. This is particularly of interest given the productivity of the site, proximity to the c. 1844-1851 residence, and the length of continuous occupation.

2.0 CONCLUSIONS AND RECOMMENDATIONS

With respect to the Interim Stage 1-2 AA, the reporting has failed to accurately take into account the West Extension Lands study area’s location on the Mount Nemo Plateau and has not captured the results of the previous archaeological assessment of the South Extension Lands.

The Stage 1-2 AA does not provide analysis to support the finding that only 33 % of the artifact assemblage of the Inglehart-Harbottle site (AiGx-462) dates to before 1870 and the subsequent recommendation that the site has no further CHVI and no Stage 3 AA is warranted. It is recommended the report be revised to include the additional analysis used to determine the percentage of the assemblage dating to pre-1870 occupation and to include supplemental information regarding the integrity of the site, distribution of artifacts, the determination of the approximate site dimensions/boundaries, and analysis of the site’s CHVI as it relates to its local context.

It should be noted that the MHSTCI the authority responsible for licencing archaeologists in the province, and are not an approval authority. The City may – as an approval authority - choose to require Stage 3 AA notwithstanding the baseline requirements outlined in the S&Gs.

With respect to the Cultural Heritage Impact Assessment (CHIA), additional information provided in the Stage 1-2 AA as a result of accessing the property, indicates that the property at 2015 No. 2 Side Road has potential CHVI as a built heritage resource. Photographs from the rear of the structure clearly indicate that

portions of the c.1844-1851 one-and-a-half-storey Inglehart farmhouse are extant. As such, 2015 No. 2 Side Road should be included in the CHIA.

We trust that this information satisfies your needs at this time. Please contact the undersigned should you have any questions or require any clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christienne Uchiyama', with a large, stylized flourish at the end.

Christienne Uchiyama, MA, CAHP
Principal, Manager – Heritage Consulting Services
Letourneau Heritage Consulting Inc.