

August 22, 2022

To: Mr. David Germain, Thomson Rogers, 390 Bay Street, Suite 3100,
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Cc:

From: David Robertson, Partner and Director, A.S.I.

RE: Archaeology Consultation Services for the Dufferin Aggregates
Proposed Milton Quarry East Expansion, Town of Halton Hills, Regional
Municipality of Halton, Ontario

File: 22PL-083

1.0 Introduction

At the request of the Regional Municipality of Halton, this letter serves as a summary of ASI's peer review of the archaeological assessment reports prepared by Golder Associates Ltd. ("Golder") as part of Dufferin Aggregates' proposed Milton Quarry East Expansion application. These following documents were reviewed for this purpose:

- Stage 1 and 2 Archaeological Assessment Milton Quarry East Extension, Part of Lots 11 and 12, Concession 1, Former Esquesing Township, Halton County, Now the Town of Halton Hills, Regional Municipality of Halton (Original Report) dated April 30, 2021;
- Stage 3 Archaeological Assessment Location 2 (AjGx-306), Milton Quarry East Extension, Part of Lots 11 and 12, Concession 1, Former Esquesing Township, Halton County, Now the Town of Halton Hills, Regional Municipality of Halton (Original Report) dated April 30, 2021

Memorandum

2.0 Background Considerations

All archaeological activities in the province of Ontario are legislated by the *Ontario Heritage Act*, which is administered by the Ministry of Tourism, Culture and Sport (M.T.C.S.). As per the *Ontario Heritage Act* R.S.O. 1990 c O.18, all professional archaeologists in Ontario must have a valid license issued by the Province, and must submit reports to M.T.C.S. detailing fieldwork activities completed for each project they undertake. In 2011 the Ministry of Tourism and Culture (now M.T.C.S.) published a technical document, *Standards and Guidelines for Consultant Archaeologists* that all consultant archaeologists must follow when conducting archaeological assessments in Ontario. Failure to comply with the *Standards and Guidelines* at a minimum can result in the temporary suspension of a consultant's license. M.T.C.S.'s role in regulating archaeological practice is confined to technical and professional matters in the conduct of archaeological activities such as the completion of archaeological assessments as required by legislation related to land use planning. In the present case, the assessments were completed to fulfill conditions applied under the *Aggregate Resources Act*, R.S.O 1990 and the *Niagara Escarpment Planning and Development Act*, R.S.O 1990, as noted in the Golder reports.

M.T.C.S. has no role as an Approval Authority in terms of any proposed development project for which an archaeological assessment may be required. However, municipalities, as Approval Authorities, generally do not have staff with requisite expertise in archaeology to evaluate archaeological assessments on technical grounds and will await receipt of notice from M.T.C.S. that an archaeological assessment has been deemed compliant with the *Standards and Guidelines*, before clearing any archaeological conditions that have been applied to any application. Such notice is typically in the form of a letter issued by M.T.C.S. indicating that the assessment report has been accepted into the Ontario Public Register of Archaeological Reports, a process which may, or may not, be preceded by a detailed technical review of the report in question. The Golder Stage 1-2 report for the Milton Quarry East Extension was accepted into the Public Register on June 29, 2021, without technical review, while the Stage 3 report was accepted on July 2, 2021, following technical review.



3.0 Peer Review of the Stage 1 and 2 Archaeological Assessment Milton Quarry East Extension Report

The Stage 1 background research carried out is sufficient for the purposes of the assessment, is at a level of detail typical for such studies and utilizes standard, accepted sources of information and data sets. The research includes summaries of the broader cultural-historical context of the Milton Quarry East study area, its general environmental setting, the extent of previous archaeological survey and site documentation within the immediate area, and the identification of archaeological potential within the study area. More attention, in terms of supplemental research using primary documents, has been paid to the Lot 12 portion of the study area historical land use and tenure, but this is understandable given the need to contextualize and evaluate the nineteenth-century archaeological site found within this part of the study area. There are some gaps/limitations to the historical research that constrain interpretation of the historical archaeological site found during the Stage 2 assessment. Some of these are attributable to the available sources, as the research appears to have been confined to a select set of on-line materials (e.g., census records, deed abstracts, and digitized directories). This may be due to Covid-19 restrictions in effect when the research was undertaken, but consulting the original deeds held at the Archives of Ontario, as well as the agricultural census returns may have permitted clarification of some aspects of the land use history.

The Stage 2 field survey was undertaken in the appropriate manner with respect to methodology. Arable lands were assessed through pedestrian survey, non-arable lands were test pitted and areas of no potential due to factors such as slope, poor drainage or previous disturbance were adequately documented. This was undertaken with the participation of representatives of the Mississaugas of the Credit First Nation and the Six Nations of the Grand River (Lands and Resources), however the Supplementary Documentation regarding the indigenous Engagement was not available for the purposes of this review.

The Stage 2 survey resulted in the discovery of three archaeological sites: two precontact Indigenous isolated finds (Locations 1 and 3) and a comparatively large



late nineteenth-century Euro-Canadian occupation (Location 2). The Supplementary Documentation containing detailed site locational information was not available for the purposes of this review.

All three sites were found in plough-disturbed contexts. A controlled surface collection of artifacts was conducted at Location 2. This is normally a Stage 3 activity, but its completion at Stage 2 provided a better artifact sample for analysis purposes.

The isolated finds, in the form of a single Onondaga chert primary thinning flake and a ground stone tool preform or rough-out, cannot be attributed to any particular time period or cultural group. The conclusion that these finds are of limited cultural heritage value or interest and do not warrant further archaeological assessment is consistent with the evaluation criteria set forth in the M.T.C.S. *Standards and Guidelines* (Section 2.2, Standards 1a and 1b).

The recommendation that Location 2—registered in the Ontario Archaeological Site Database maintained by M.T.C.S. as site AjGx-306—be subject to Stage 3 site-specific archaeological assessment is also appropriate and consistent with the *Standards and Guidelines* (Section 2.2, Standard 1c). The intent of this recommended work was to document the character and extent of the site more fully, to secure a larger artifact sample in an effort to refine its date of occupation and, generally, to provide a sound basis for evaluation of its significance or value as an archaeological resource.

4.0 Peer Review of the Stage 3 Archaeological Assessment Location 2 (AjGx-306), Milton Quarry East Extension Report

The Stage 3 assessment at Location 2 (AjGx-306) was conducted in a manner consistent with the requirements of the *Standards and Guidelines*. As noted above, the controlled surface collection of the site was completed at the time of its discovery during the Stage 2 assessment. The Stage 3 work involved the excavation of 51 one-metre square test units across the site, balancing the need for systematic sampling, focused testing, and definition of site limits. The excavations yielded a sample of 1,119 artifacts



representative of a late nineteenth-century occupation and also uncovered evidence of subsurface settlement features, two of which were minimally explored.

The identification, analysis and interpretation of the artifact assemblage is sound and is based on reference to recognized, authoritative, sources, both in terms of material culture and aspects of taphonomy or site formation processes.

No additional land use history research was carried out for the purposes of the Stage 3 assessment and the attribution of the site to the Chisholm family, exclusively, is perhaps problematic. There are artifacts in the assemblage that clearly post-date the Chisholm's tenure based on the historical research presented in the report. This same historical research identifies several other potential late nineteenth-century owners of Lot 12, Concession 1, and also questions whether or not the Chisholms and their successors occupied the property or simply farmed it.

Despite these uncertainties as to the association(s) of the archaeological site, it is clear that it does not represent a resource of cultural heritage value or interest according to the evaluation criteria set forth in the *Standards and Guidelines* (Section 3.4.2, Standard 1a and Table 3.2). The conclusion that site AjGx-306 has been sufficiently documented and that no further archaeological assessment is required is appropriate. With the completion of the Stage 3 archaeological assessment, all archaeological concerns with respect to the proposed Milton Quarry East Expansion application have been addressed, subject to the limitations noted on page vi of the Stage 1-2 report and page iv of the Stage 3 report.

5.0 References

Ministry of Tourism and Culture. (2011). *Standards and Guidelines for Consultant Archaeologists*. Cultural Programs Branch, Ontario Ministry of Tourism and Culture.

