

Proposed Burlington Quarry Expansion JART COMMENT SUMMARY TABLE – Archaeology

Please accept the following as feedback from the Burlington 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 (January 2021)	Reference	Source of Comment	Applicant Response	JART Response
Report/Date: Archaeological Assessment: Stage 1 and 2, March 23, 2020			Author: Golder Associates Ltd.		
1.	The 2020 Stage 1-2 Archaeological Assessment of the West Extension lands is an interim report. Stage 2 fieldwork and reporting has not been completed for the entirety of the study area and is required. The Golder Report identifies approximately 11.1 ha of lands associated with the golf course lands that require a Stage 2 Archaeological Assessment. What is the status of the Stage 2 Archaeological Assessment?	General	Addressed by September 15, 2020 Submission		
2.	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.	General	Letourneau Heritage Consulting Inc.		
3.	It is 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.	General	Letourneau Heritage Consulting Inc.		
4.	The descriptions of AiGx-238 and AiGx-239 (Table 2) do not correspond with their descriptions in the Stage 4 AA prepared by Archaeologix in 2004. Notwithstanding these omissions, the identification of areas of archaeological potential have captured all undisturbed lands within the study area and the report appears to conform with the <i>Standards and Guidelines for Consultant Archaeologists (S&Gs)</i> . It should be stressed that the Interim Stage 1-2 AA was required prior to Stage 2 AA fieldwork being undertaken on 11.1 hectares of the Licence Boundary area along the western boundary of the West Extension Lands (see attached Map 5). Stage 2 fieldwork is still outstanding for this portion of the West Extension Lands and the entire study area has not been cleared of further archaeological concern (this is noted in the report).	General	Letourneau Heritage Consulting Inc.		
Report/Date: Archaeological Assessment (Stages 1,2 & 3), August 2003			Author: Archaeologix Inc.		
5.	The 2003 Stage 1, 2 & 3 AA predates the S&Gs.	General	Letourneau Heritage Consulting Inc.		
6.	Similar to the 2020 Interim Stage 1-2 AA, the 2003 Stages 1, 2 & 3 AA does not adequately address the setting of the study area nor does it provide a robust pre-contact or historical context.	General	Letourneau Heritage Consulting Inc.		
7.	Notwithstanding this, the Stage 1 findings are consistent with the current requirements and resulted in Stage 2 survey (test pits at 5-meter intervals) and pedestrian survey of the entirety of the study area. Stage 2 fieldwork methodologies and recommendations, similarly, appear to be generally consistent with the S&Gs.	General	Letourneau Heritage Consulting Inc.		
8.	The Stage 3 AA fieldwork methodology, although consistent with standard practices at the time, does not conform to Section 3.2.3, Standard 1 (Table 3.1) the S&Gs; however, because all three of the registered sites underwent Stage 4 AA, this would not have resulted in a different outcome under the current S&Gs. The boundaries of the Stage 3 excavation of all three sites are consistent with the current S&Gs.	General	Letourneau Heritage Consulting Inc.		

Report/Date: Archaeological Assessment (Stage 4), August 2004		Author: Archaeologix Inc.	
9.	<p>The Stage 4 AA documents the full excavation and documentation of registered sites AiGx-238, AiGx-239, and AiGx-240.</p> <p>The Stage 4 AA report does not appear to be the most up to date version of the report and cites an incorrect “CIF” number on the title page. A search through the MHSTCI PastPortal database identified a 2005 report - <i>A.A. (Stage 4), Nelson Aggregate Quarry Expansion, Lot 17 & 18, Con. 2 NDS, Geo. Twp. of Nelson, City of Burlington, R.M of Halton, Ontario</i> under the Project Information Number (PIF) P001-160.</p> <p>It is likely that the report includes revisions or additional information requested by the MHSTCI, at the time of their review. As such, the 2005 Stage 4 AA should be submitted as part of the application. As a general note, no Indigenous engagement appears to have been undertaken as part of the Stage 3 or 4 assessment of the cultural heritage value or interest of AiGx-238, AiGx-239, and AiGx-240.</p>	General	Letourneau Heritage Consulting Inc.
10.	<p>The area is identified as being within historic Anishnaabe and Haudenosaunee territory. Were indigenous communities consulted during the undertaking of any of the archaeological assessments and reviews?</p>	General	Niagara Escarpment Commission
Report/Date: Draft Technical Memorandum Re: Nelson Quarry Application and Stage 1-2 Archaeological Assessment (Golder Associates, September 15, 2020) (October 19, 2020)		Author: LTH Consulting Inc.	
11.	<p>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).</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>The identification of areas of archaeological potential appears to have captured all undisturbed lands within the study area in conformance with the <i>Standards and Guidelines for Consultant Archaeologists (S&Gs)</i>.</p> <p>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-Harbbottle 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.</p> <p>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</p>	General	Letourneau Heritage Consulting Inc.

	<p>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:</p>				
12.	<p>1. Approximately 33% of the site dates before 1870 (Executive Summary and Section 4.5 Conclusions).</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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 	General	Letourneau Heritage Consulting Inc.		
13.	<p>2. ...the site has no further cultural heritage value or interest...</p> <p>Per the bulletin,</p> <p>The ministry expects the available evidence to be incorporated into the report to make a recommendation of no further CHVI. This includes:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>	General	Letourneau Heritage Consulting Inc.		

	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. 				
14.	<p>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.</p>	General	Letourneau Heritage Consulting Inc.		
15.	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	General	Letourneau Heritage Consulting Inc.		