

Ministry of Tourism, Culture and Sport

Archaeology Programs Unit
Programs and Services Branch
Culture Division
401 Bay Street, Suite 1700
Toronto ON M7A 0A7
Tel.: (416) 314-7691
Email: lan.Hember@ontario.ca

Ministère du Tourisme, de la Culture et du Sport

Unité des programmes d'archéologie
Direction des programmes et des services
Division de culture
401, rue Bay, bureau 1700
Toronto ON M7A 0A7
Tél. : (416) 314-7691
Email: lan.Hember@ontario.ca



May 8, 2017

Parker S. Dickson (P256)
Stantec Consulting
171 Queens London ON N6A 5J7

RE: Review and Entry into the Ontario Public Register of Archaeological Reports: Archaeological Assessment Report Entitled, "Stage 3 Archaeological Assessment of the Thomas Madill Site (AIHb-13), the Alex Crawford Site (AIHa-46), and the Donald and Duncan Crawford Site (AIHa-45), East Garafraxa Pit, Tri-County Aggregates, Part of Lots 2 and 3, Concession 18, Township of East Garafraxa, County of Dufferin, Ontario", Dated Mar 9, 2017, Filed with MTCS Toronto Office on Apr 3, 2017, MTCS Project Information Form Number P256-0403-2016, P256-0404-2016, P256-0405-2016, MTCS File Number 0002657

Dear Mr. Dickson:

This office has reviewed the above-mentioned report, which has been submitted to this ministry as a condition of licensing in accordance with Part VI of the Ontario Heritage Act, R.S.O. 1990, c 0.18.¹ This review has been carried out in order to determine whether the licensed professional consultant archaeologist has met the terms and conditions of their licence, that the licensee assessed the property and documented archaeological resources using a process that accords with the 2011 Standards and Guidelines for Consultant Archaeologists set by the ministry, and that the archaeological fieldwork and report recommendations are consistent with the conservation, protection and preservation of the cultural heritage of Ontario.

The report documents the assessment/mitigation of the study area as depicted in Figures 5 through 9 of the above titled report and recommends the following:

The Stage 3 archaeological assessment of the portion of the Thomas Madill site (AIHb-13) within the study area resulted in the documentation of a Euro-Canadian occupation dating to the mid to late 19th century. Given the paucity of artifacts (less than 10 artifacts per unit) and the fact that less than 80% of the artifact assemblage dates to before 1870, the portion of the site within the study area does not fulfill the criteria for Stage 4 archaeological mitigation of development impacts as per Section 3.4.2 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologists. Therefore, the portion of the Thomas Madill site (AIHb-13) within the study area retains no further cultural heritage value or interest. Stage 4 archaeological mitigation of development impacts for the portion of the Thomas Madill site (AIHb-13) within the study area is not recommended.

The portion of the site outside of the study area that has not been subjected to Stage 3 assessment retains cultural heritage value or interest and is still recommended for Stage 3 archaeological assessment. Therefore, it is also recommended that a temporary fence be installed along the western limits of the study

area along the eastern extent of the unexcavated portion of the Thomas Madill site (AIHb-13) during construction related to the aggregate pit, as illustrated in Figure 8 and Tile 6 of the Supplementary Documentation. “No-go” instructions will be issued to all on-site construction crews, engineers, architects and any others involved in day-to-day decisions during construction. The location of the area to be avoided will be on all contract drawings, when applicable, and will include explicit instructions to avoid the area. All construction activities in proximity to the fencing will be monitored by a licensed archaeological consultant in order to prevent any construction impacts to the site. The licensed archaeological consultant will report upon the effectiveness of the strategy to avoid the site in a separate report.

If it is decided to conduct the remainder of the archaeological investigation of the Thomas Madill site (AIHb-13) instead of avoiding the site, then the recommendation for Stage 4 mitigation of the remainder of the site as recommended by ASI (2014) still stands. Therefore a Stage 3 archaeological assessment should be conducted according to the procedures outlined in the MTCS’ 2011 Standards and Guidelines for Consultant Archaeologists. The Stage 3 archaeological assessment will include CSP of the remainder of the site, and then additional Stage 3 test units spanning the limits of the Stage 2 surface collection and Stage 3 CSP. These test units will be excavated by hand every ten metres in systematic levels and into the first five centimetres of subsoil. An additional 40% of the total number of units excavated on the grid will be excavated in areas of interest within the site extent, such as areas of high artifact concentration on the surface or near high-yielding grid units. All excavated soil will be screened through six millimetre mesh and any artifacts being recovered will be recorded and catalogued by the corresponding grid unit designation as per Section 3.2.2 Standard 7 of the Standard and Guidelines for Consultant Archaeologists. If a subsurface cultural feature is encountered, the plan of the exposed feature will be recorded and geotextile fabric will be placed over the unit before backfilling the unit.

The Stage 3 archaeological assessment of the Alex Crawford site (AIHa-46) resulted in the documentation of a Euro-Canadian occupation dating to the mid-to-late 19th century. With the recovery of subsurface cultural features and 80% of the artifact assemblage representing a period of use that mostly occurred prior to 1870, the Alex Crawford site fulfills the criteria for Stage 4 archaeological mitigation of development impacts as per Section 3.4.2 of the MTCS’ 2011 Standards and Guidelines for Consultant Archaeologists. Therefore, the Alex Crawford site (AIHa-46) retains further cultural heritage value or interest. Stage 4 archaeological mitigation of development impacts for the Alex Crawford site (AIHa-46) is recommended. The MTCS prefers, for sites recommended for Stage 4 mitigation of impacts, that the site be avoided and protected rather than excavated, as per Section 7.9.4 Standard 2 of the MTCS’ 2011 Standards and Guidelines for Consultant Archaeologists. Options to reduce or eliminate impacts to archaeological sites include redesigning the Project, excluding the archaeological site area from the Project, or incorporating the area of the archaeological site into the Project but without alteration, as outlined in Section 3.5 of the 2011 Standards and Guidelines for Consultant Archaeologists. If these options are not feasible, Stage 4 archaeological mitigation by excavation is an alternative.

In consultation with the client, the Stage 4 mitigation of the Alex Crawford site (AIHa-46) by avoidance is both viable and preferred. The approach taken will be the exclusion of the area that includes the Alex Crawford site (AIHa-46). It is recommended that temporary fence be installed along the 10 metre buffer outside of the site extents as determined by the Stage 3 CSP and test unit excavations during construction related to the aggregate pit, as illustrated in Figure 9 and Tile 7 in the Supplementary Documentation. “No-go” instructions will be issued to all on-site construction crews, engineers, architects and any others involved in day-to-day decisions during construction. The location of the area to be avoided will be on all contract drawings, when applicable, and will include explicit instructions to avoid the area. All construction activities in proximity to the fencing will be monitored by a licensed archaeological consultant to prevent any construction impacts to the site. The licensed archaeological consultant will report upon the effectiveness of the strategy to avoid the site in a separate report.

If it is decided to conduct a Stage 4 mitigation by excavation for the Alex Crawford site (AIHa-46) instead of avoiding the site, then the Stage 4 mitigation will be conducted according to the procedures outlined in the MTCS’s 2011 Standards and Guidelines for Consultant Archaeologists (Government of Ontario 2011). It is recommended that the Stage 4 archaeological mitigation by excavation of the Alex Crawford site (AIHa-46) consist of a hand excavated block of one-metre units in the cluster of high yielding units. The extent of the site will be determined in accordance with Table 4.1 in Section 4.3 of the 2011 Standards and Guidelines for Consultant Archaeologists. All units will be excavated into the first five centimetres of subsoil. Soil from

the units will be screened through six millimetre hardware cloth to facilitate the recovery of any artifacts that may be present. All artifacts will be bagged and tagged by provenience. The exposed subsoil surface will be cleaned by shovel or trowel and will be examined for cultural features. If any subsurface cultural features are encountered they will be recorded and excavated by hand in accordance with Section 4.2.2 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologists. Block excavation will continue to two metres beyond any cultural feature identified in accordance with Section 4.2.2 of the 2011 Standards and Guidelines for Consultant Archaeologists.

In accordance with Section 4.2.7 Standard 2, and Section 4.3 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologist, the Stage 4 mitigation by excavation of the Alex Crawford site (AIHa-46) includes the mechanical topsoil removal of the remainder of the site. The extent of mechanical topsoil removal will extend a minimum of 10 metres beyond any uncovered cultural feature. If any cultural features are encountered during mechanical topsoil removal they will be recorded and excavated by hand in accordance with Section 4.2.2 and Section 4.2.7 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologists.

Since the highest artifact counts during Stantec's Stage 3 archaeological assessment were along the western edge of the study area, it is likely that the Alex Crawford site (AIHa-46) extends to the west outside of the study area. As a result, the portion of the site outside of the study area that has not been subjected to archaeological investigation retains cultural heritage value or interest and is recommended for Stage 2 archaeological assessment. The Stage 2 assessment will consist of Stage 2 pedestrian survey at five metre intervals within ploughed agricultural fields and will be assessed according to Section 2.1.1 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologists.

The Stage 3 archaeological assessment of the Donald and Duncan Crawford site (AIHa-45) resulted in the documentation of a Euro-Canadian occupation dating to the mid-to-late 19th century. Less than 80% of the artifact assemblage represents a period of use prior to 1870. Therefore, the Donald and Duncan Crawford site (AIHa-45) does not fulfill the criteria for Stage 4 archaeological mitigation of impacts as per Section 3.4 of the MTCS' 2011 Standards and Guidelines for Consultant Archaeologists. Therefore, the Donald and Duncan Crawford site (AIHa-45) has no further cultural heritage value or interest and no further work is required.

The MTCS is asked to accept this report into the Ontario Public Register of Archaeological Reports. Additional archaeological assessment is still required and so the archaeological sites recommended for further archaeological fieldwork remain subject to Section 48(1) of the Ontario Heritage Act and may not be altered, or have artifacts removed, except by a person holding an archaeological license.

Based on the information contained in the report, the ministry is satisfied that the fieldwork and reporting for the archaeological assessment are consistent with the ministry's 2011 Standards and Guidelines for Consultant Archaeologists and the terms and conditions for archaeological licences. This report has been entered into the Ontario Public Register of Archaeological Reports. Please note that the ministry makes no representation or warranty as to the completeness, accuracy or quality of reports in the register.

Should you require any further information regarding this matter, please feel free to contact me.

Sincerely,

Ian Hember
Archaeology Review Officer

cc. Archaeology Licensing Officer
Larry Pevato, Tri-County Aggregates Ltd.
Diane Schwier, Ministry of Natural Resources

¹In no way will the ministry be liable for any harm, damages, costs, expenses, losses, claims or actions that may result: (a) if the Report(s) or its recommendations are discovered to be inaccurate, incomplete, misleading or fraudulent; or (b) from the issuance of this letter. Further measures may need to be taken in the event that additional artifacts or archaeological sites are identified or the Report(s) is otherwise found to be inaccurate, incomplete, misleading or fraudulent.

2/1 Smart/17



92 Kenbar Drive, North York, ON M9L 1N2
TRI-COUNTY PIT

PART OF LOTS 2 AND 3
CONCESSION 18
TOWNSHIP OF EAST GARAFRAXA
COUNTY OF DUFFERIN

Drawing 2 of 3 OPERATIONAL PLAN

OTHER LANDS OWNED BY
TRI-KAMP FARMS

OTHER LANDS OWNED
BY LICENSEE

