

SUPPLEMENTARY DOCUMENTATION
Stage 4 Mitigation of Impacts,
H1 (AkHd-4),
Alma Subdivision, 31 Church St, Alma

Part of Lots 1–8, 10, 11, 25–35 and
Part of Lot 9, Registered Plan 134 and
Lot 1, Concession 1 West of Grand River,
Geographic Township of Pilkington,
Township of Mapleton, County of Wellington

Submitted to:

Exact Construction Ltd.
8262 Wellington 19,
Fergus, Ontario
N1M 2W4

and

Ontario's Ministry of Citizenship and Multiculturalism

Submitted by:



Detritus
CONSULTING LTD.
archaeology · heritage

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Licensee: Michael Pitul
License Number: P462
PIF Number: P462-0212-2023
CP Number: 2023-15

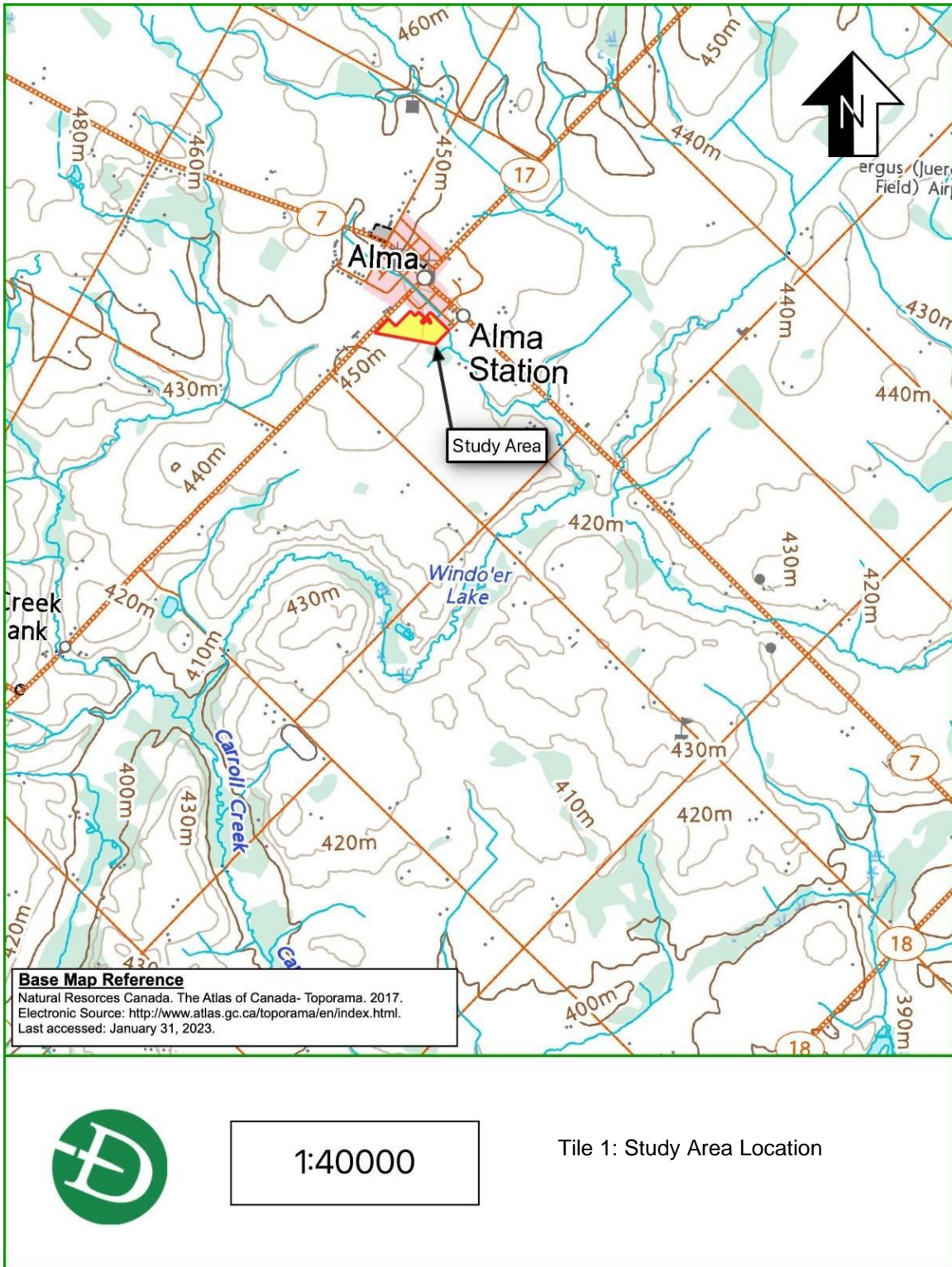
ORIGINAL SUPPLEMENTARY DOCUMENTATION

May 23, 2024

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1.0 Maps





Base Map Reference
Guy, Leslie, and Charles J. Wheelock. 1861. Map of the County of Wellington, Canada West. Orangeville: Guy & Wheelock.



Not to Scale

Tile 2: Portion of Guy Leslie's 1861 Map of the County of Wellington, Canada West



Base Map Reference
Walker & Miles. (1877). *The Illustrated Historical Atlas of the County of Wellington, Ont.*
Toronto: Walker & Miles.





Not to Scale

Tile 3: Portion of Walker and Miles 1877 Illustrated Historical Atlas of the County of Wellington, Ont.



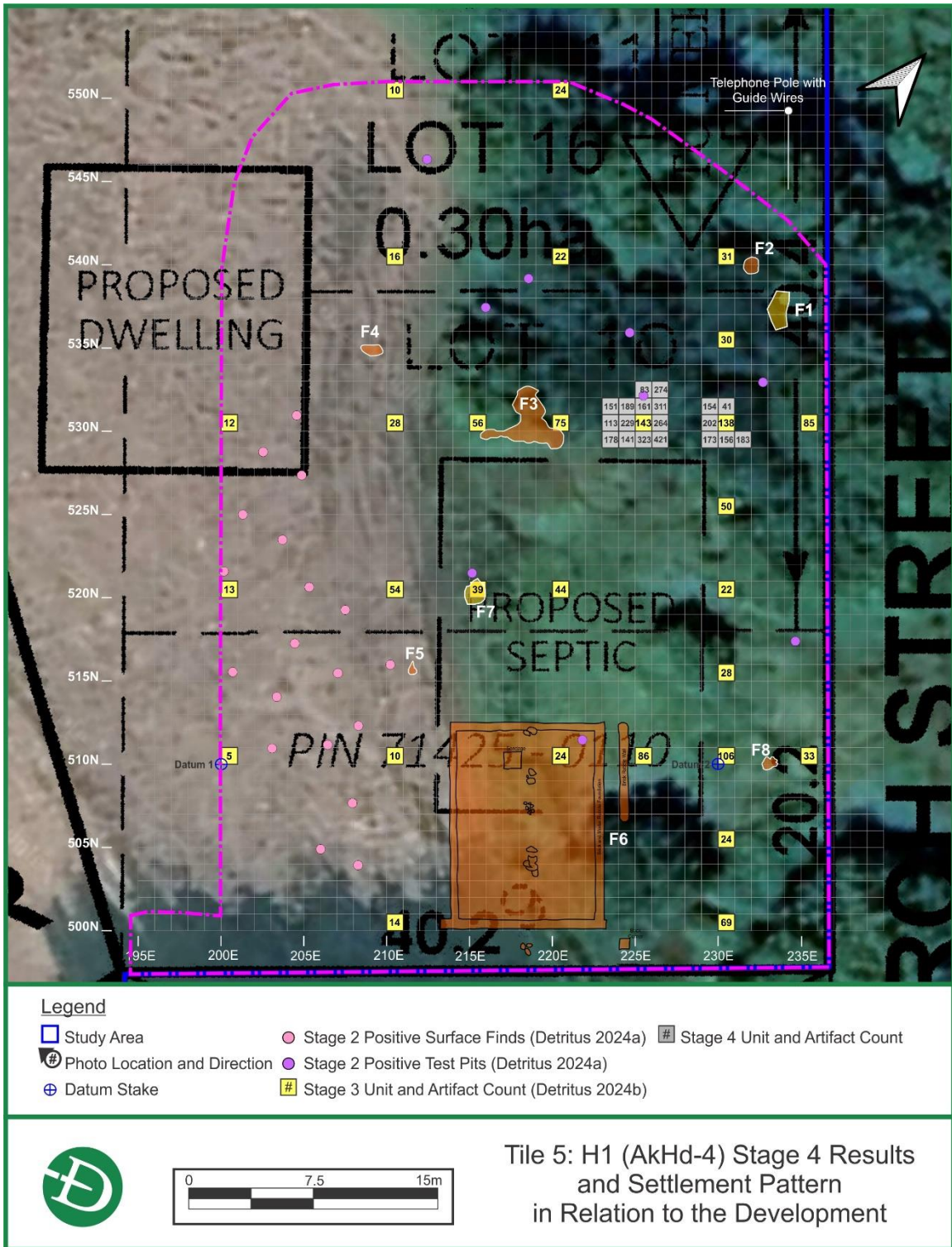
Legend

-  Site Locations
-  Study Area
-  Stage 2 Surface Finds (Detritus 2023)



Title 4: Previous Archaeological Assessment

Map Creator: Isaac Bender
CRS: WGS 84 NAD 17N
Baselayer: Google Satellite Imagery



2.0 Universal Transverse Mercator

The Universal Transverse Mercator ('UTM') coordinates recorded during the Stage 4 mitigation are provided below. The UTM coordinates were recorded using a "Bad Elf" GPS Pro with a stationary accuracy of 2.5m (North American Datum 1983 ('NAD83') and UTM Zone 17T). The UTM coordinates for H1 (AkHd-4) are presented in Table 1 below.

Table 1: UTM Coordinates for H1 (AkHd-4)

Description	UTM Easting	UTM Northing
Northwest	540043	4841745
Southeast	540081	4841707
Northeast	540069	4841748
Southwest	540060	4841693
Centre	540060	4841730
Datum #1	540059	4841704
Datum #2	540082	4841723

3.0 Aboriginal Engagement

As per Section 7.6.2, Standards 1 and 2 of the *Standards and Guidelines for Consultant Archaeologists* ('Standards and Guidelines'; Government of Ontario, 2011a), details regarding the engagement activities conducted by Detritus Consulting Ltd. ('Detritus') as part of the current Stage 4 Mitigation are provided below. Copies of the separate email correspondences between Detritus and Mississaugas of the Credit First Nation ('MCFN'), Six Nations of the Grand River ('SNGR'), and Haudenosaunee Development Institute ('HDI') as well as a copy of the project memo sent to all three communities can be found in Sections 3.1 and 3.2 below.

According to Section 3.4, Standard 2 of the *Standards and Guidelines for Consulting Archaeologists* (Government of Ontario 2011a) and Section 1.1, Standard 1 of the *Engaging Aboriginal Communities in Archaeology* draft technical bulletin (Government of Ontario 2011b), Aboriginal communities must be engaged during a Stage 3 assessment when assessing the cultural heritage value or interest of an Aboriginal archaeological site that is known to have or appears to have sacred or spiritual importance, or is associated with traditional land uses or geographic features of cultural heritage interest, or is the subject of Aboriginal oral histories (Government of Ontario 2011a and 2011b).

Furthermore, Section 3.5, Standard 1 of the *Standards and Guidelines for Consulting Archaeologists* (Government of Ontario 2011a) and Section 1.1, Standard 2i of the *Engaging Aboriginal Communities in Archaeology* draft technical bulletin (Government of Ontario 2011b) states that Aboriginal communities must be engaged following a Stage 3 assessment when formulating Stage 4 mitigation strategies for the following types of Aboriginal archaeological sites:

- a. rare Aboriginal archaeological sites
- b. sites identified as sacred or known to contain human remains
- c. Woodland Aboriginal sites
- d. Aboriginal sites where topsoil stripping is being contemplated
- e. Undisturbed Aboriginal sites
- f. Sites previously identified as being of interest to the Aboriginal community

Section 1.2, Guideline 4 of the *Engaging Aboriginal Communities in Archaeology* draft technical bulletin (Government of Ontario 2011b) goes on to state that Aboriginal engagement is encouraged during a Stage 3 assessment when making recommendations regarding the excavation or preservation of Aboriginal archaeological sites of cultural heritage value or interest other than those identified in the standards listed above, in order to review the recommendations with the relevant Aboriginal communities.

Detritus was retained to conduct a Stage 4 mitigation at H1 (AkHd-4) located at 31 Church St, Alma. As part of Detritus' Aboriginal engagement practices local First Nation communities are contacted prior to every project Detritus is retained to complete. Additionally, Detritus contacts all Proponents on behalf of First Nation communities with regards to sharing their contact information, therefore allowing them to set up a monitoring agreement, if they choose.

On February 7, Detritus provided Mr. Kevin Vanleeuwen (the 'Proponent') with a cost estimate to conduct the Stage 4 Mitigation at AkHd-5. See Pages 2 and 3 of the Cost Estimate document (see Section 3.1.1 below for a copy of the signed Cost Estimate), Detritus outlines its current engagement policies.

The purpose of this text was to inform the Proponent of the following;

1. That while engagement is not mandated for Stage 4 Mitigation, it is Detritus' current Engagement policy to engage during all stages of investigation;
2. that the MCM also encourages engagement at all stages of archeological investigation;
3. that typically, First Nations communities request that the Proponent retain at cost representatives to serve as on-site monitors;
4. that Detritus must address any request made by First Nations communities for on-site monitors; and

Stage 4 Mitigation of Impacts, H1 (AkHd-4), Alma Subdivision, 31 Church St, Alma

5. that, although not mandated, Detritus encourages the Proponent to retain on-site monitors, and requests that they share their contact information with First Nations communities.

On February 9, 2023 the Proponent returned a signed copy of the cost estimate, but did not agree to provide their contact information

While the Proponent did not provide approval to share their contact information with First Nations communities, they did agree to allow First Nation representatives on site as unpaid monitors.

Local First Nation communities were contacted on April 25, 2023 via email to inform them of the project, including a proposed start anticipated of the following week. The email also contained a memo outlining Detritus' proposed Stage 4 Mitigation strategies. The purpose of this memo was to provide local First Nation communities an opportunity to provide input on the assessment strategies.

In this memo First Nation communities were informed that the Proponent was unwilling to share their contact information; however, representatives were welcome on site as unpaid monitors during the assessment. In lieu of monitors on site Detritus was willing to provide First Nation communities with the results of the fieldwork and a copy of the completed draft report prior to its submission to the MCM.

On May 9, 2023 Detritus contacted all three communities to inform them that we were staking in the site that day and that we would be heading out the following day to begin the excavation. Detritus also reiterated details from the project memo including that the Proponent was unwilling to share their contact information, however, the communities were welcome to join us on site as unpaid monitors. Additionally, we would provide them with a draft copy of the report prior to its submission to the MCM.

The Stage 3 assessment was conducted between May 9th and September 14th, 2023. No representatives were present during the Stage 4 Mitigation.

3.1 Email Correspondence

3.1.1 Signed Cost Estimate

Please advise whether you give us permission to provide your contact info to Aboriginal communities with treaty rights in the area of your project. If First Nations monitors are to be deployed this proposal should be considered invalid and a new one will be issued.

- I DO agree to allow Detritus to provide local Aboriginal communities with the Proponent's contact information
- I DO NOT agree to allow Detritus to provide local Aboriginal communities with the Proponent's contact information

3.2 Project Memo



Date: April 25, 2023

RE: Stage 4 Mitigation of Impacts, H1 (AkHd-4), 31 Church Street, Alma

PIF(s): IN PROGRESS

INTRODUCTION

Detritus Consulting Ltd. ('Detritus') has been retained by 31 Church Street, Alma ('the Proponent') to conduct Stage 4 mitigation by hand excavation at archaeological site H1 (AkHd-4), located at 31 Church Street, Alma in advance of future development on the property.

This Stage 4 mitigation will be managed by professional archaeological license (P-license) holder Michael Pitul, and will adhere to the archaeological license report requirements under subsection 65 (1) of the *Ontario Heritage Act* and the Ministry of Citizenship and Multiculturalism's ('MCM') *Standards and Guidelines for Consultant Archaeologists* ('Standards and Guidelines'), established in 2011.

PREVIOUS ASSESSMENTS

H1 (AkHd-4) was identified during a Stage 1-2 assessment of the Study Area, conducted by Detritus in 2022 (P389-0538-2021). H1 (AkHd-4) was identified as a 19th century Euro-Canadian site that was recovered along the northeastern edge of the Study Area. **A copy of the Stage 1-2 report was sent to your office on March 30, 2023.**

Detritus also completed the Stage 3 assessment of H1 (AkHd-4) between October 11, 2022 and November 7, 2022 (P389-0628-2022). The Stage 3 assessment of H1 (AkHd-4) produced 1,291 Euro-Canadian artifacts from the hand excavation of 29 test units. Four features were observed during the Stage 3 assessment and have been covered with geotextile fabric for future exploration. Overall, the distribution of artifacts and features at H1 (AkHd-4) suggests the site was subject to a demolition event sometime in the late 19th century, pushing structural components such as brick, mortar, and slag towards the western half of the site, while the higher artifact counts remained relatively intact along the eastern half of the site.

Based on the available evidence, H1 (AkHd-4) has been interpreted as a demolition event that occurred at the original church building, located at 31 Church Street, prior to or around the time of its relocation in 1892 to 8 Peel Street to meet the demands of the growing congregation. Some artifacts found at this site could also be related to the nearby occupations by the Pilkington, Sylec, McRae, and Thompson families, dumped at this location prior to the demolition event.

Based on the results of the Stage 3 assessment, H1 (AkHd-4) has been interpreted as a Euro-Canadian site occupied from the middle of the 19th century until the early 20th century. Given the period of occupation represented within the Stage 3 assemblage, in addition to the presence of four possible subsurface cultural features, **H1 (AkHd-4) meets the criteria for a Stage 4 Mitigation of Developmental Impacts, as per Section 3.4, Standard 1g of the Standards and Guidelines.**

The MCM prefers that sites recommended for Stage 4 mitigation of impacts be avoided and protected rather than excavated, as per Section 7.9.4, Standard 2 of the *Standards and Guidelines*. Options to reduce or eliminate impacts to archaeological sites include redesigning the Study Area; excluding the archaeological site area from the Study Area; or incorporating the area

of the archaeological site into the Study Area but without alteration, as outlined in Section 3.5 of the *Standards and Guidelines*. If these options are not feasible, Stage 4 archaeological mitigation by hand excavation is an alternative. In consultation with the client, the Stage 4 mitigation of H1 (AkHd-4) by avoidance and protection is not a viable option. As such, a Stage 4 archaeological mitigation by hand excavation is recommended, conducted according to Section 4.2 of the *Standards and Guidelines*.

According to Section 4.2.7, Standard 2 of the *Standards and Guidelines*, the Stage 4 mitigation of archaeological sites that mostly date after 1830 must include the hand excavation of all midden areas, followed by mechanical topsoil removal ('MTR') across the remainder of the site. As was noted above, the wealth of structural and ceramic items in both the Stage 2 and Stage 3 assemblages, supports the presence of a domestic scatter at H1 (AkHd-4). Therefore, the Stage 4 excavation will consist of a hand excavated block of 1m units surrounding the highest yielding Stage 3 test units at 215E, 520N; 220E, 515N; 225E, 510N; 230E, 510N; and 235E, 510N as well as the units containing evidence of sub-surface cultural features. The extent of the block excavations will be determined in accordance with Section 4.3, Standard 1 and Table 4.1 of the *Standards and Guidelines*.

Soil from all Stage 4 units will be screened through 6mm hardware cloth to facilitate the recovery of any small 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 *Standards and Guidelines*. As noted above, block excavation will continue to 2m beyond any cultural feature identified in accordance with Section 4.2.2, Standard 7c of the *Standards and Guidelines*.

Following the block excavation, MTR down to the topsoil/subsoil interface will occur across the unexcavated portion of the site in order to identify and document any additional sub-surface features or evidence of original architecture. The Stage 4 MTR must be completed in accordance with Section 4.2.3, Section 4.2.7, and Table 4.1 of the *Standards and Guidelines*. The entire limits of the site, as determined by the previous Stage 2 and Stage 3 assessments, will be subject to MTR employing a straight-edged ditching bucket that pulls the soil away from the exposed surface. The subsoil surface will then be immediately shovel shined and examined for any evidence of subsurface cultural features. If any subsurface cultural features are encountered, they will be recorded and excavated by hand in accordance with Section 4.2.2, Standard 7 of the *Standards and Guidelines*. **A copy of the Stage 3 report was sent to your office on March 30, 2023.**

STAGE 4 MITIGATION BY HAND EXCAVATION STRATEGY

The purpose of a Stage 4 mitigation by hand excavation is to document an archaeological site through its controlled removal in order to address archaeological concerns under land use planning and development processes. In compliance with the *Standards and Guidelines*, the objectives of the Stage 4 mitigation of impacts at H1 (AkHd-4) are to document the archaeological context, cultural features and artifacts for all parts of the site; to document the removal of the archaeological site; and to preserve the information recovered about the archaeological site for future study.

As mentioned above, the Stage 4 excavation of H1 (AkHd-4), a Euro-Canadian site, will consist of a hand excavated block of one-metre units surrounding the five highest yielding Stage 3 test units as well as the units containing evidence of sub-surface cultural features. Following the block excavation, MTR down to the topsoil/subsoil interface will occur across the unexcavated portion of the site in order to identify and document any additional sub-surface features or evidence of original architecture.

PROPONENT CONTACT INFORMATION

Detritus has informed the Proponent of our current Aboriginal Engagement policies. As part of this communication, Detritus has requested that the Proponent provide your office with their contact information in advance of any Stage 4 fieldwork.

Despite our petition, the Proponent has not agreed to provide contact information at this time. Detritus has reminded the Proponent of the expectation among local Aboriginal communities that representatives be retained as paid on-site monitors during a Stage 4 mitigation. Additionally, Detritus has informed the Proponent of the MCM's expectation that any Cultural Resource Management ('CRM') firm retained to conduct archaeological fieldwork within the Study Area to address Aboriginal concerns, including the retaining of on-site monitors during the current Stage 4 mitigation.

Nevertheless, since any legal or financial agreements between Aboriginal communities and a Proponent fall outside the purview of both the MCM and CRM firms in Ontario, **Detritus cannot compel the Proponent to enter into a monitoring agreement.** Furthermore, since on-site monitors are not mandated by the MCM as part of the Aboriginal engagement process, Detritus has no legal standing to boycott any contracted fieldwork in absence of a monitoring agreement. **However, Detritus has insisted that all applicable Aboriginal communities be granted access to the property throughout the investigation.**

ENGAGEMENT ACTIVITIES

A proposed start date is provided in the table on Page 4. **In lieu of on-site monitors, Detritus is willing to provide your office with a summary of the Stage 4 results in the form of final field mapping and a description of any diagnostics that are identified in the field.** Detritus is also willing to utilise alternative approaches to share project details, including the use of an online portal, if requested.

Additionally, **your office will be provided with a draft copy of the final Stage 4 report, once completed, prior to its submission to the MCM.** Any input on the contents of the report, in particular the methodology and recommendations, may be made directly to the Project Manager or Licensee (see below for contact information). Finally, your office will be notified if Detritus is retained to conduct any subsequent Stage 4 investigation within the Study Area.

PROJECT CONTACT INFORMATION

For more information on this Stage 4 mitigation, please do not hesitate to contact either Garth Grimes, the Project Manager, or Michael Pitul, the Licensee.

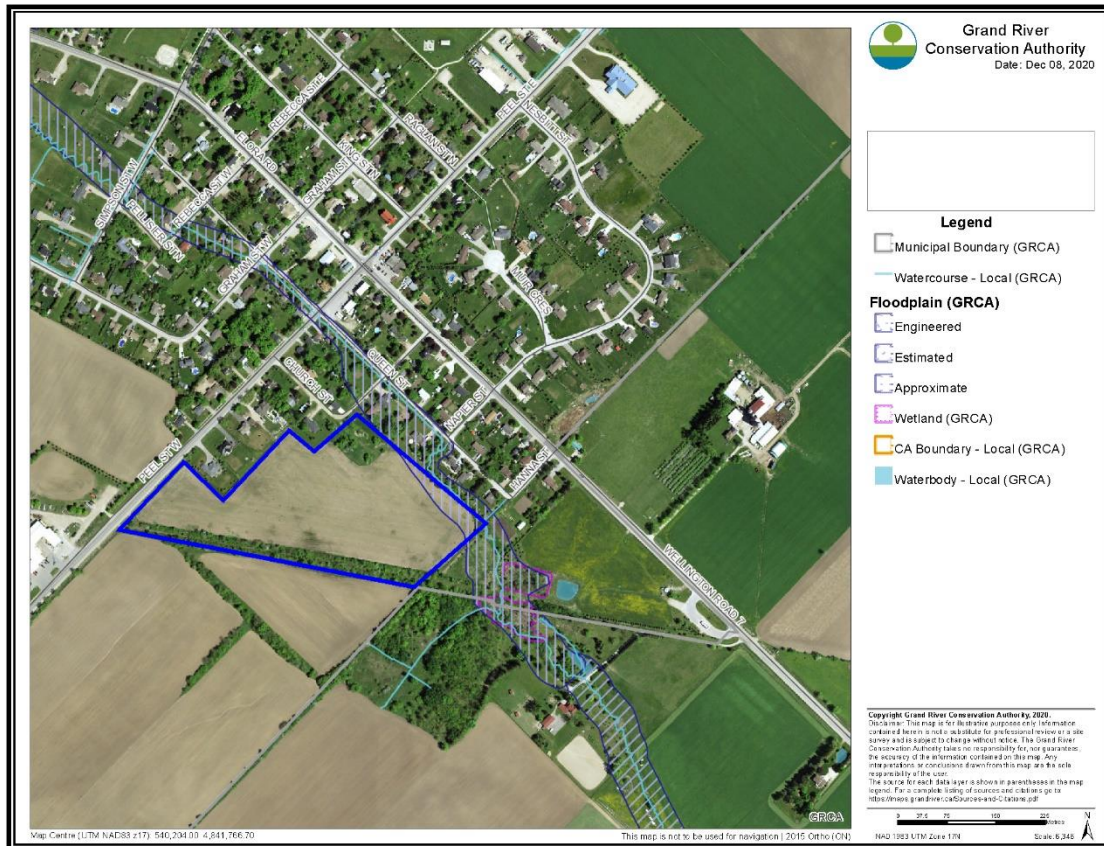
Garth Grimes, BA, BED.
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Professional Archaeology License No. P462
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PROJECT DETAILS

Address:	31 Church Street, Alma
PIF Number:	In Progress
Licensee:	Michael Pitul
Project Manager:	Garth Grimes
Field Director(s):	Jon Cousins
Proposed Start Date:	to be confirmed (weather and field condition dependent)
Expected Duration:	several days
Meeting Time	to be confirmed
Size of Field Crew:	to be confirmed
Location of the Study Area and parking	see map below
Required PPE:	safety vest, CSA approved steel toe boots or shoes

STUDY AREA LOCATION



4.0 Correspondence

The following is correspondence from the MCM regarding Stage 4 mitigation strategies.

From: Campbell, Paige (MCM) <Paige.Campbell@ontario.ca>
Sent: July 10, 2023 11:49 AM
To: Mike Pitul <mikepitul.arch@outlook.com>
Cc: Archaeology (MCM) <archaeology@ontario.ca>; Wallace, Melissa (MCM) <Melissa.Wallace@ontario.ca>; Prowse, Shari (MCM) <Shari.Prowse@ontario.ca>; Hadlari, Wai (MCM) <Wai.Hadlari@Ontario.ca>
Subject: RE: Stage 4 at Alma Church AkHd-4 request for advice

Hi Mike,

Thanks for the report and advice. We have no objection to the MTR of site AkHd-4 at this point, in those areas outside the cemetery buffer as you have described below. Please let me know if you need any further advice, and please include a copy of this advice in your report package as an "OT" file.

Paige

Paige Campbell
Archaeology Review Officer
Ministry of Citizenship and Multiculturalism
Citizenship, Inclusion and Heritage Division | Heritage Branch
435 S. James Street, Suite 334
Thunder Bay, ON P7E 6S7
249-885-1567
paige.campbell@ontario.ca

Please include a PDF copy of this advice as supplementary documentation to your project report package.

As a standard part of all advice provided to licensees, please note that this advice has been provided by this ministry under the assumption that the information submitted by the licensed archaeologist is complete and accurate. The advice provided applies only to the project in question and is not to be used as a precedent for future projects. Further measures may need to be taken in the event that additional artifacts or archaeological sites are identified or if the information provided by the licensed archaeologist is otherwise found to be inaccurate, incomplete, misleading, or fraudulent.

From: Mike Pitul <mikepitul.arch@outlook.com>
Sent: July 8, 2023 8:12 AM
To: Campbell, Paige (MCM) <Paige.Campbell@ontario.ca>
Cc: Archaeology (MCM) <archaeology@ontario.ca>
Subject: Re: Stage 4 at Alma Church AkHd-4 request for advice

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi Paige

Thanks so much

I have attached the Stage 1-2 SDs, and the 3 report.

The Stage 3 cemetery work has not been completed as we are awaiting CIA for that project.

We are going to conduct the Stage 4 work up to the 509 North line which is about 10m from the edge buffer around the Stage 3 Cemetery Investigation. We are going to halt the MTR there and then conduct the Stage 3 cemetery investigation MTR which will also complete the Stage 4 MTR.

I have also attached the email from Melissa that shows the advice on how to conduct the Stage 3 cemetery search.

[P389-0628-2022, P389-0629-2022 13Feb2023 RE.pdf](#)

[P389-0538-2021 01Feb2023 SD.pdf](#)

[MCM Advice.pdf](#)

Michael Pitul Company Director
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Begin forwarded message:

From: "Campbell, Paige (MCM)" <Paige.Campbell@ontario.ca>

Date: July 5, 2023 at 09:24:25 EDT

To: mikepitul.arch@outlook.com

Cc: "Archaeology (MCM)" <archaeology@ontario.ca>

Subject: Stage 4 at Alma Church AkHd-4 request for advice

Hi Mike,

I will help you with this request. I notice that none of the reports have been submitted and the 2021 Stage 1-2 report has been held up with multiple extensions for a variety of reasons. Would you be able to send me a draft copy of the Stage 1-2 and Stage 3 reports to me so I have a sense of where everything is? You can email it to me as long as it is 8MB or less. Even just the maps from

the reports/SDs so I have an idea of where the various Stage 3 assessments have been done, and where the AkHd-4 stage 4 work is being done.

My main concern is if this Stage 4 overlaps at all with any of the area of the cemeteries investigation stage 3.

Paige Campbell

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From: Mike Pitul <mikepitul.arch@outlook.com>
Sent: May 16, 2023 11:11 AM
To: Archaeology (MCM) <archaeology@ontario.ca>
Subject: Stage 4 at Alma Church AkHd-4 request for advice

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hello

We are currently conducting stage 4 hand excavation at the Alma church (AkHd-4 PIF P462-0212-2023).

The site has been found to have two layers of soil. There is a topsoil layer that spans the entire site, a demolition layer that which is dating from the middle to late 19th century and buried topsoil which is found buried under the portions of the site that have the demolition layer present. In the units surrounding the areas with the demolition layer is only the singular topsoil layer with no other strata that directly seals subsoil.

The demolition layer is currently ranging in artifact counts from 56- over 150 artifacts per unit. It contains mostly plaster and structural material, metal, glass, and some ceramics. We believe that this demolition layer represents the remains of the church that was on the property in the 1860s. This further leads us to believe that the demolition layer is a result of someone digging a hole and burying the remains of the church sometime in the 20th century. Currently the demolition layer extends between the 223e and 224e lines.

The units dug without the demolition layer and the buried topsoil have artifact counts ranging from 12 to 72 with sub soil being sterile. The artifacts represented within these layers are ceramics, household, and personal with accompanying structural artifacts. There is no evidence of fatty or dark soils or high concentrations of faunal remains that would indicate that a midden is present.

We are requesting advice on changing strategies and moving to full MTR if the site in search of features and structural remains of the church only as none of the units have produced anything that would lead us to believe that there is a midden area.

I have attached a current field map which has total unit counts of combined topsoil and demolition layers.

Thank you

Mike



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