STAGE 2 ARCHAEOLOGICAL ASSESSMENT OF
6432 NINTH LINE, SCAPPICCHIO PROPERTY
PART OF LOT 8, CONCESSION 9 NEW SURVEY
GEOGRAPHIC TOWNSHIP OF TRAFALGAR, HALTON COUNTY
NOW THE CITY OF MISSISSAUGA, REGIONAL MUNICIPALITY OF PEEL

SUPPLEMENTARY DOCUMENTATION

Prepared for:

Derry Britannia Developments Limited 7880 Keele Street, Suite 500 Vaughan, ON L4K 4G7 T 905-907-8888

Archaeological Licence #P046 (Clish) MTCS PIF# P046-0191-2016 ASI File: 16TS-045

13 September 2018

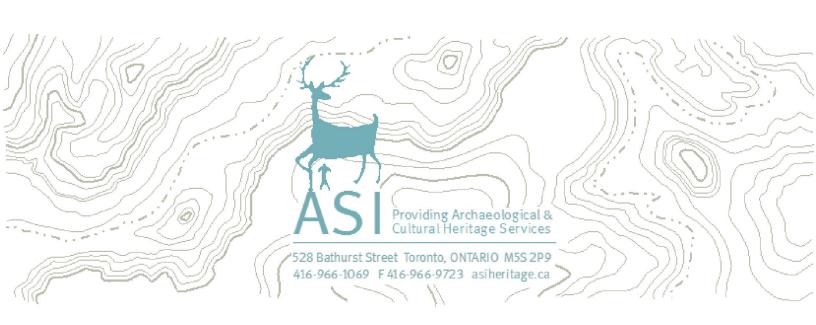


TABLE OF CONTENTS

TABLE	OF CONTENTS	
	OF CONTENTS	
	DETAILED SITE LOCATION INFORMATION	
2.0	DETAILED SITE LOCATION MAPPING	1
	List of Figures	
Figure	1: Detailed Location of the Douglas Site (AjGw-559)	2



1.0 DETAILED SITE LOCATION INFORMATION

Project: Stage 2 Archaeological Assessment of 6432 Ninth Line, part of Lot 8, Concession 9, Geographic

Township of Trafalgar, Peel County, now in the City of Mississauga, Regional Municipality of Peel

ASI File: 16TS-045 **MTCS PIF:** P046-0191-2016

GPS Model & Type: Garmin Oregon 450

			method of confection. H, a		
Location	UTM Coordinates	Error (+/-)	Elev (asl)	Coordinate Type	Conditions
Douglas Site	598944 4824257	5 m	191 m	Site centre	Optimal
(AjGw-559)	598955 4824272	5 m	191 m	NE limit of main field scatter	Optimal
	598969 4824248	5 m	191 m	SE limit of main field scatter	Optimal
	598903 4824235	5 m	191 m	SW limit of main field scatter	Optimal
	598936 4824256	5 m	191 m	NW limit of main field scatter	Optimal
	598939 4824282	5 m	191 m	Test Unit #1	Optimal
	598932 4824278	5 m	191 m	Test Unit #2	Optimal
Artifact	598953 4824297	5 m	191 m	NE limit of distribution	Optimal
Distribution	598969 4824248	5 m	191 m	SE limit of distribution	Optimal
(All Contexts)	598903 4824235	5 m	191 m	SW limit of distribution	Optimal
	598932 4824275	5 m	191 m	NW limit of distribution	Optimal
Off-site datum	598935 4824336	5 m	192 m	Hydro pole #1	Optimal
	598961 4824309	5 m	194 m	Hydro pole #2	Optimal

2.0 DETAILED SITE LOCATION MAPPING

See the following page for detailed site location mapping.



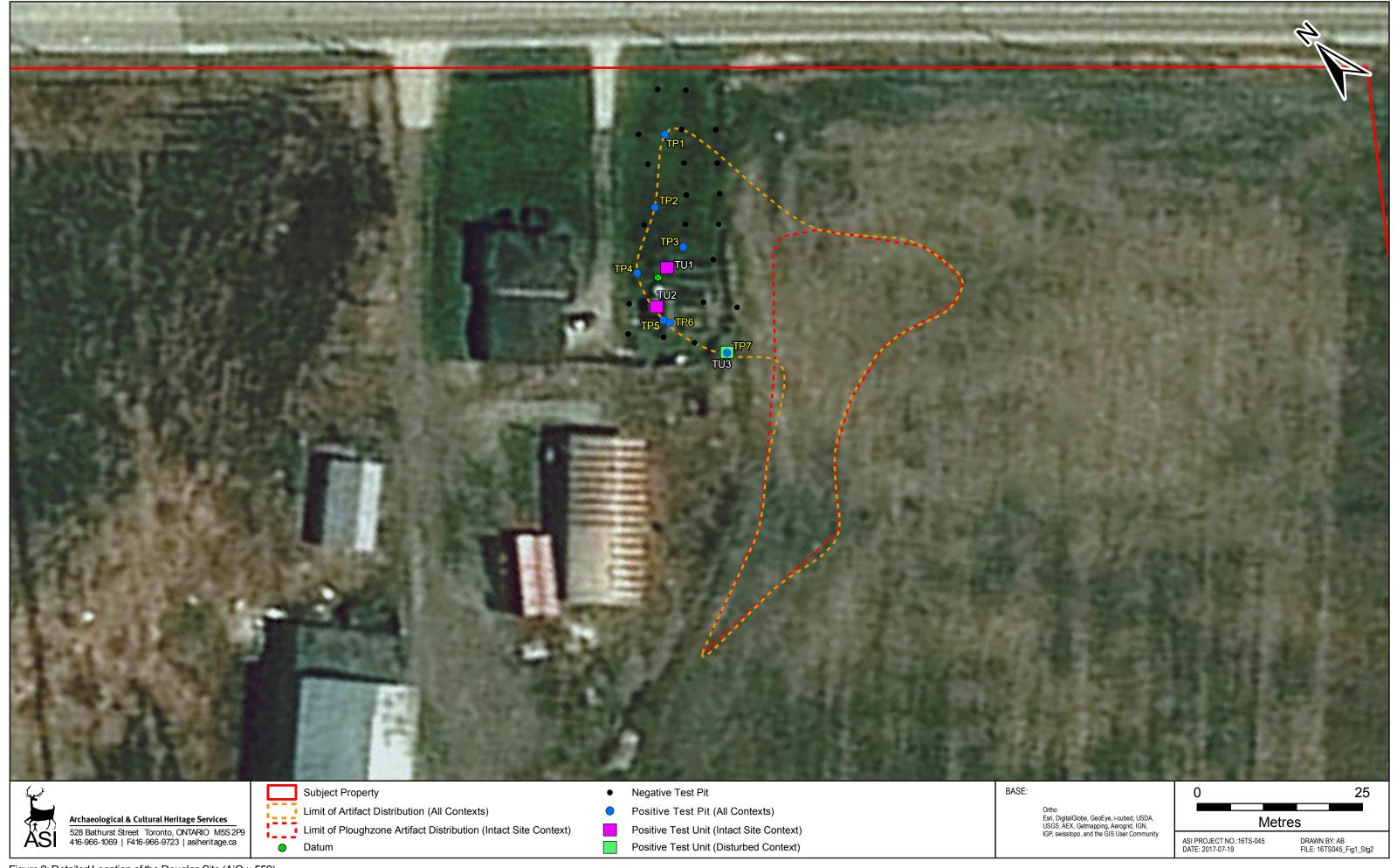


Figure 2: Detailed Location of the Douglas Site (AjGw-559)

March 16, 2018



VIA EMAIL: lan.Hember@ontario.ca

Mr. Ian Hember Archaeology Programs Unit Programs and Services Branch Culture Division 401 Bay Street, Suite 1700 Toronto, ON M7A 0A7 Tel: 416-314-7691

Dear Mr. Hember:

RE: Stage 2 Archaeological Assessment of 6432 Ninth Line, City of Mississauga

(ASI FILE:16TS-045)

Thank you for relaying your concerns regarding the Stage 2 Archaeological Assessment of 6432 Ninth Line, Mississauga (PIF P046-0191-2016) under MTCS File Number 0004204. We wish to address the following issue identified in the second report review letter dated August 28, 2017:

1. The letter dated November 22, 2016 indicated that an argument against Stage 3 needed to meet the requirements articulated in the technical bulletin "The Archaeology of Rural Historical Farmsteads." Among these requirements is that a CSP must be done. The revised report has clarified that no CSP was undertaken, which means that the minimum requirements for arguing against Stage 3 have not been met. Please either return to the field to complete the CSP required by the bulletin, or recommend Stage 3.

Our Stage 2 assessment of the property determined that the Douglas Site (AjGw-559) overlaps portions of both the ploughed field and the adjacent manicured lawn. As such, the assessment of the site involved both a pedestrian survey component in the field and a test pit survey component on the lawn.

The pedestrian survey of the ploughed field component was conducted in accordance with the methodology outlined in Section 2.1.2 of the 2011 *Standards and Guidelines of Consultant Archaeologists* (S&G), which requires that the site area be subject to an intensified pedestrian survey conducted at intervals of one metre. The intensified pedestrian survey resulted in a very diffuse surface scatter of 103 historical artifacts over a 65 m by 30 m (3,000 m²) area. In order to provide a more comprehensive analysis and interpretation of the site, we chose to collect 100% of the surface artifacts after intensification, far exceeding the minimum requirement of 20 artifacts recovered from the site which date the period of use to before 1900, as stated in the S&G, Section 2.2, Standard 1c.

The test pit survey of the lawn component was conducted in accordance with the methodology outlined in Section 2.1.3 of the 2011 S&G, which requires that the site area be subject to an intensified survey by one of two options: 1) intensified test pits and a minimum of one test unit (Option A), or 2) a minimum of three test units without the need for intensified test pitting (Option B). Further to this, Section 2.2.3 of the 2014 Archaeology of Rural Historical Farmsteads: Draft Technical Bulletin states that, for sites found during test pit survey, "Usually it will be most beneficial to excavate test units (as opposed to intensified test pitting) since this will allow a better comparison with other sites in terms of artifact yield per one

metre square test unit and will provide better information about site integrity." It was thus concluded that Option B would provide the most accurate and comprehensive data set, and three test units were excavated in the portion of the lawn where the initial test pit survey indicated the greatest potential for the recovery of cultural material from intact contexts. The intensified survey of the lawn component resulted in the recovery of 157 artifacts from two positive test units located six metres apart and approximately 17 metres northwest of the field surface scatter; the third test unit only yielded material from disturbed contexts.

Upon completion of the intensified Stage 2 assessment of both the ploughed field component and the lawn component, the overall site assemblage numbered 260 artifacts, of which 40% originated from the very diffuse field surface scatter and 60% from the two test units within a concentrated area of the adjacent lawn. Through the analysis of the substantial artifact assemblage, which represents 100% of the artifacts encountered from good contexts during both intensified survey components, we believe we have presented sufficient evidence in our report to conclude that the main occupation of the Douglas site (AjGw-559) post-dates 1870 and thus does not require further assessment.

As we understand it, the concerns over the recommendation against further Stage 3 assessment of the Douglas site (AjGw-559) presented in our report is with regard to the additional criteria and guidelines for the intensified survey methodology for historical sites outlined in the 2014 *Technical Bulletin*. The second Ministry review letter dated August 28, 2017, as cited above, states that one of the required revisions specified in the original review letter, dated November 22, 2016, is that "a CSP *must* be done" and, as such, "the minimum requirements for arguing against Stage 3 *have not* been met."

We first wish to address the reference made back to the original November 22, 2016 review letter. The actual statement made in the original letter is that "the site needs to be subjected to CSP *or* intensified test pitting and test units," which accurately reflects one of the requirements summarized in Section 2.3 of the 2014 *Technical Bulletin* for making a recommendation for no further concern.

As written, Section 2.2.1 of the 2014 *Technical Bulletin* suggests that intensification of sites found by pedestrian survey *can* be acquired through a CSP to provide a better quality of evidence than an artifact sample acquired by intensified survey at one-metre intervals alone (as per the S&G, Section 2.1.1, Standard 7); however, this is *not* stated as a necessary requirement for intensification in either the 2014 *Technical Bulletin* or the 2011 S&G. Subsequently, the 2014 *Technical Bulletin* specifies that intensification of sites found during test pit survey should follow the provisions of the S&G, Section 2.1.3, which allows for the choice of either Option A (intensified test pits and at least one test unit) *or* Option B (no intensified test pitting but a minimum of three test units)¹.

The 2014 *Technical Bulletin* does not address sites which were found through a combined pedestrian and test pit survey, as is the case with the Douglas Site (AjGw-559), and therefore does not provide specific instruction or guidance regarding the preferred method of intensification in this particular situation. We wish to emphasize, however, that *neither* the original letter dated November 22, 2016 nor the 2014 *Technical Bulletin* specifies that both forms of intensification *must* be undertaken in order to make the recommendation for no further work. Given the very diffuse nature of the surface scatter of the ploughed field, of which 100% of the artifacts were collected and analyzed after the necessary intensified pedestrian survey, it is in our professional judgment that the larger and more concentrated yield from the intensification of the lawn component has provided a more comprehensive data set of intact cultural material from the site than that which would be gained from a CSP of the field component.

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¹ We believe it also worth noting that while it Section 2.3 of the 2014 *Technical Bulletin* makes reference to "both intensified test pitting and test units according to Section 2.1.3 [of the 2014 S&G]," this is in contradiction to the two options provided in Section 2.1.3, of which only Option A requires intensified test pitting, as well as Section 2.2.3 of the 2014 *Technical Bulletin*, which states a preference for multiple test units over intensified test pitting.

For the reasons stated above, we believe the discussion of the methodology, artifacts, and supporting documentation provided in our Stage 2 report meets or exceeds all requirements outlined in both the 2011 S&G (Section 2.2, Standard 1c and Section 3.4.2, Standard 1) and the 2014 *Technical Bulletin* (Section 2.2.5 and Section 2.3) which are necessary to make a recommendation against Stage 3 assessment of the Douglas site (AjGw-559).

Sincerely,

ARCHAEOLOGICAL SERVICES INC.

Jamie Houston-Dickson, MA

fin Hit- him

Associate Archaeologist and Technical Writer, Planning Assessment Division





RE: Follow-Up Communication, RE: Report Review for 6432 Ninth Line, Mississauga (PIF P046-0191-2016)

Hember, Ian (MTCS) to: JHoustonDickson@asiheritage.ca "AClish@asiheritage.ca", "RMacDonald@asiheritage.ca", Cc: "JLey@asiheritage.ca", "EMacDonald@asiheritage.ca", "BGarner@asiheritage.ca". "Horne. Malcolm (MTCS)"

04/19/2018 10:19 AM

"Hember, Ian (MTCS)" < Ian. Hember@ontario.ca> From:

To: "JHoustonDickson@asiheritage.ca" <JHoustonDickson@asiheritage.ca>

Cc: "AClish@asiheritage.ca" <AClish@asiheritage.ca>, "RMacDonald@asiheritage.ca" <RMacDonald@asiheritage.ca>, "JLey@asiheritage.ca" <JLey@asiheritage.ca>,

"EMacDonald@asiheritage.ca" <EMacDonald@asiheritage.ca>, "BGarner@asiheritage.ca"

History:

This message has been replied to and forwarded.

Hi Jamie,

Interestingly, I only found this e-mail because I'd mistakenly sent something unrelated to my spam folder and had to dig it out. Your e-mail was among the various solicitations for money from Nigerian nobility. I've added you to a whitelist now, just in case.

I have had the chance to review the letter, and to discuss the matter with the team here. The CSP will need to be completed in order to support a recommendation of no further cultural heritage value or interest. If in the future you propose to deviate from standards or from the steps laid out in any of our technical bulletins, please contact archaeology@ontario.ca in advance in order to discuss appropriate alternate strategies or recommendations prior to completing fieldwork or submitting the report.

Please note that I am no longer reviewing reports, having taken on the role of Licensing and Information Officer for the next while. You may find that other staff here take over from me on this or other requests for revision. It's nothing to be alarmed about; it's just a heads up to remind everyone.

Regards,

Ian Hember

Archaeology Licensing and Information Officer (Acting)

Ministry of Tourism, Culture and Sport

416-314-7691 | Ian.Hember@ontario.ca

www.ontario.ca/archaeology

From: JHoustonDickson@asiheritage.ca [mailto:JHoustonDickson@asiheritage.ca]

Sent: April 17, 2018 12:01 PM

To: Hember, Ian (MTCS)

Cc: AClish@asiheritage.ca; RMacDonald@asiheritage.ca; JLey@asiheritage.ca;

EMacDonald@asiheritage.ca; BGarner@asiheritage.ca

Subject: Follow-Up Communication, RE: Report Review for 6432 Ninth Line, Mississauga (PIF

P046-0191-2016)

Good afternoon,

I wish to enquire about the email and accompanying letter regarding our Stage 2 Archaeological Assessment report for 6432 Ninth Line in Mississauga (PIF P046-0191-2016) which was sent to you on March 16, 2018. A follow-up email was subsequently sent on March 29, 2018 but I have yet to receive a response to either communication. If you could please confirm if these emails were received and whether or not you have had a chance to review the letter in question, it would be greatly appreciated.

For your convenience, the accompanying letter from the original March 16, 2018 communication has been appended to this email.

Regards,

Jamie Houston-Dickson, MA

Archaeologist | Technical Writer • Planning Assessment Division



ASI • Providing Archaeological & Cultural Heritage Services

JHoustonDickson@asiheritage.ca • 416 966 1069 x269 •

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200-2321 Fairview Street, Burlington, Ontario, L7R 2E3 •

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Thank you. Note: We have taken precautions against viruses, but take no responsibility for loss or damage caused by any virus present.

May 31st, 2018



VIA EMAIL: Andrea.Williams@ontario.ca

Ms. Andrea Williams
Archaeology Program Unit
Ministry of Tourism, Culture and Sport
401 Bay Street, Suite 1700
Toronto, ON M7A 0A7
Tel: 416-314-2120

Dear Ms. Williams,

RE: Stage 2 Archaeological Assessment of 6432 Ninth Line, City of Mississauga

MTCS File Number 0004202 PIF P046-191-2016

(ASI File: 16TS-045)

We are writing to seek clarification on the Ministry's position on this file, as we are somewhat confused by the responses we have received and the suggestion that our work has not met the requirements of the Standards and Guidelines.

By way of background, the original Stage 2 Archaeological Assessment report recommending no further work at the historic Douglas Site (AjGw-559) was filed with the MTCS on November 16, 2016 and a MTCS review letter was received on November 22, 2016 outlining several revisions which needed to be completed. A revised report was filed on August 2, 2017 and a second MTCS review letter was received on August 28, 2017. This second review letter indicated that one of the required revisions from the original review letter, the completion of a CSP, had not been met and therefore it was necessary to "either return to the field to complete the CSP required by the [2014 Archaeology of Rural Historical Farmsteads: Draft Technical Bulletin], or recommend Stage 3." In response, a memo was drafted and sent to the MTCS on March 16, 2018. As detailed in our March 16 memo, we reviewed both the 2011 S&G and the 2014 Technical Bulletin and concluded that, as written, we believe we have addressed all fieldwork and reporting requirements outlined in these documents in order to recommend no further work. In an emailed response sent April 19, 2018, Ian Hember reiterated the necessity of a CSP at this site in order to recommend no further work, but no specific explanation for this decision was provided. We would therefore like to request additional details from the MTCS regarding the rationale to uphold the CSP requirement in light of the arguments laid out in our March 16 memo so that we can better understand this decision.

The following table lists the five types of evidence outlined in Section 2.2 of the 2014 *Technical Bulletin* (page 10: "Are you recommending no further CHVI?") which must be incorporated into the report in order to recommend that no further work be conducted. The following table summarizes the information provided in our report which demonstrates that each of these requirements has been addressed:

Recommending no further CHVI (2014	Supporting evidence provided in the revised Stage 1-2 report		
Technical Bulletin, S. 2.2, pg. 10)			
An analysis of the complete artifact assemblage	100% of the artifacts from the intensified surveys of the lawn and ploughed field were retained and analyzed. Less than 80% of the assemblage pre-dates 1870, therefore the site does not meet the criteria for CHVI (S&G, Section 3.4.2, Standard 1a)		
All available historical documentation	A comprehensive land use history was provided which strongly supports a primary association with the Douglas occupation ca. 1870-1899		
Any information from extant built heritage	No built heritage assessments have been conducted but a discussion of historical mapping sources and the land use history indicated the adjacent extant house was likely constructed in the late nineteenth century		
The local and regional context	A discussion of the site as it fits within the local and regional context was included in the revised report (Section 4.0 Analysis and Conclusion)		
Any information regarding site integrity	The site integrity was discussed throughout the report. Only artifacts from two test units were from good context (60%), the remaining test unit and all test pits were thoroughly disturbed. The field surface scatter (40%) was from a plough-disturbed context and had a very diffuse distribution.		

At issue is the stated requirement in the August 2017 review letter that a CSP *must* be conducted in order to support a recommendation for no further work at the site. We believe this is in reference to one of the criteria listed in Section 2.3 of the 2014 *Technical Bulletin*, which states that a CSP *or* intensified test pitting and test units are required to recommend no further work. However, as detailed in our March 16 memo, Section 2.2 of the 2014 *Technical Bulletin* (page 9: "Are you using pedestrian survey?") states that intensification of sites found in a ploughed field context *can* be acquired through a CSP, during which *all* artifacts are recovered, but it does *not* indicate a CSP is a necessary addition to the standard Stage 2 intensified pedestrian survey at onemetre intervals. We have argued in the March 16 memo that through the intensification of the lawn component and the intensified pedestrian survey of the field, during which *all* of the artifacts were recovered, we have sufficiently met the requirements to recommend no further work as they are laid out in both Sections 2.2 and 2.3 of the 2014 *Technical Bulletin*.

Further to this, we wish to emphasize that there is an existing precedent for recommending no further work at a historic site within a ploughed field context in the absence of a CSP, provided the entire surface scatter was retained. Site AfHa-955 was identified during the Stage 1 and 2 Archaeological Assessment of Part of Lot 26, Registrar's Compiled Plan 73 in the Town of Hagersville, which was conducted by ASI in June and July of 2017 under MTCS PIF P449-0021-2017 (MTCS File Number 0006350). This site consisted of 36 historical artifacts distributed across a 30 m by 20 m area; no formal CSP was conducted, however *all* artifacts encountered during the intensified pedestrian survey of Site AfHa-955 were collected and analyzed. The final report, dated September 8, 2017, successfully argued that Site AfHa-955 does not meet the criteria for CHVI as the artifact assemblage and the archival evidence provided by the comprehensive land use history demonstrated that more than 80% of the time span of occupation post-dates 1870. Therefore, it was recommended that this historic site does not require further archaeological assessment (ASI 2017: Recommendation 4). The report and its recommendations were subject to review and accepted into the Ontario Public Register of Archaeological Reports on October 10, 2017.

Although Site AfHa-955 was encountered exclusively within a ploughed field context, we believe this example is relevant to our current recommendation for no further work at the Douglas Site (AjGw-559), as intensified surveys of both the lawn and the ploughed field components were conducted in accordance with Section 2.1.2 of the S &G and 100% of the artifacts from both intensification components were collected and analyzed. Furthermore, the artifacts recovered from the Douglas Site (AjGw-559) field scatter numbered 103, far exceeding the 36 artifacts of the Site AfHa-955 assemblage which were used to formulate the recommendation for no further work at that site. Like Site AfHa-955, the complete artifact assemblage and the comprehensive land use history has clearly demonstrated that the Douglas Site (AjGw-559) post-dates 1870.

Given the arguments previously laid out in our March 16 memo and the precedent set by the Stage 1 and 2 assessment of Site AfHa-955 detailed above, we do not believe a CSP of the field component of the Douglas Site (AjGw-559) is required under the 2011 S&G or the 2014 *Technical Bulletin* in order to make a recommendation for no further work. Furthermore, it is our professional opinion that an additional CSP at this site would not result in any further contributions to the understanding of this post-1870 historic site, its CHVI, or the general nineteenth-century settlement patterns of the area.

Sincerely,

ARCHAEOLOGICAL SERVICES INC.

Jamie Houston-Dickson, MA

fin Hit- like

Associate Archaeologist | Technical Writer - Planning Assessment Division





RE: Seeking Clarification for Stage 2 Assessment of 6432 Ninth Line, Mississauga (PIF P046-0191-2016)

Williams, Andrea (MTCS) to: JHoustonDickson@asiheritage.ca

07/16/2018 11:01 AM

"AClish@asiheritage.ca", "DRobertson@asiheritage.ca",

Cc: "BGarner@asiheritage.ca", "JLey@asiheritage.ca",

"RMacDonald@asiheritage.ca", "EMacDonald@asiheritage.ca"

From: "Williams, Andrea (MTCS)" <Andrea.Williams@ontario.ca>

To: "JHoustonDickson@asiheritage.ca" <JHoustonDickson@asiheritage.ca>

Cc: "AClish@asiheritage.ca" <AClish@asiheritage.ca>, "DRobertson@asiheritage.ca"

<DRobertson@asiheritage.ca>, "BGarner@asiheritage.ca" <BGarner@asiheritage.ca>,

"JLey@asiheritage.ca" <JLey@asiheritage.ca>, "RMacDonald@asiheritage.ca"

History: This message has been replied to and forwarded.

Good morning, Jamie and ASI staff,

I am stepping into the disagreement about whether an intensified survey without artifact location information provided by CSP is sufficient to support the argument for no further CHVI at the Douglas site.

In the interest of moving this 2016 project forward, and also considering the delay relating to e-mails from ASI not being received by Ian Hember and myself, I am prepared to accept a report on P046-0191-2016 that does not include a CSP.

The July 2017 version of the P046-0191-2016 report is currently awaiting revision. Please revise the report to include the expanded analysis and conclusions presented in the memos e-mailed by ASI to MTCS this year. Please also submit these memos and the ministry correspondence with the supplementary documentation. I will ensure that this revised report is assigned to me for review

At this time, I am not able to confirm that this is MTCS's position on CSP relating to the *Archaeology of Rural Historical Farmsteads: Draft Technical Bulletin* from this point on. I appreciate that the wording in the bulletin can be interpreted in more than one way. When the question of whether CSP is needed to support a recommendation for no CHVI at Stage 2 arises next, please submit a request for advice so that the specific situations can be discussed. Please do not consider Stage 2 work at the Douglas site to set the precedent for how to confirm no further CHVI.

Thank you again for your patience.

-Andrea

Andrea Williams

Archaeology Review Officer

Archaeology Program Unit

Ministry of Tourism, Culture and Sport

401 Bay Street, Suite 1700

Toronto, Ontario

M7A 0A7

416-314-2120

Andrea. Williams@ontario.ca

This advice has been provided by MTCS 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.

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

From: JHoustonDickson@asiheritage.ca [mailto:JHoustonDickson@asiheritage.ca]

Sent: May 31, 2018 4:52 PM

To: Williams, Andrea (MTCS) < Andrea. Williams@ontario.ca>

Cc: AClish@asiheritage.ca; DRobertson@asiheritage.ca; BGarner@asiheritage.ca; JLey@asiheritage.ca; RMacDonald@asiheritage.ca; EMacDonald@asiheritage.ca

Subject: Seeking Clarification for Stage 2 Assessment of 6432 Ninth Line, Mississauga (PIF

P046-0191-2016)

Good afternoon Andrea,

I am contacting you regarding the MTCS review of our Stage 2 Archaeological Assessment report for 6432 Ninth Line in Mississauga (MTCS File #0004204). As I indicated in my email last week, we are hoping you can provide some additional clarification regarding the MTCS decision to uphold the requirement of conducting a CSP at the historic Douglas Site (AjGw-559) following the March 16, 2018 memo which was sent to Ian Hember. Please see the attached .pdf file titled "P046-0191-2016 Review Response - Memo 2 (31May18)" for further details. I have also attached the original March 16 memo ("Memo 1") for reference. Please feel free to contact me if you require additional information.

Regards,

Jamie Houston-Dickson, MA

Associate Archaeologist | Technical Writer • Planning Assessment Division



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