

Ministry of Citizenship and Multiculturalism (MCM)

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Ministère des Affaires civiques et du Multiculturalisme (MCM)

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Mar 27, 2024

Nicholas Gromoff (P206)
Ground Truth Archaeology
1470 County Road 2 Mallorytown ON K0E 1R0

RE: Review and Entry into the Ontario Public Register of Archaeological Reports: Archaeological Assessment Report Entitled, "Stage 3 Archaeological Assessment of AIGh-75, the Burlingham Site, located on part of Lot 19, Concession 2, South Side of East Lake, Township of Athol, County of Prince Edward, Ontario", Dated Dec 6, 2023, Filed with MCM Toronto Office on Feb 16, 2024, MCM Project Information Form Number P206-0181-2021, MCM File Number 0005907

Dear Mr. Gromoff:

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 of the study area as depicted in Figures 15, 18 and 21 and Supplementary Documentation Figure 4 of the above titled report and recommends the following:

As a result of the Stage 3 archaeological assessment and in concordance with the 2011 Standards and Guidelines for Consultant Archaeologists, Ground Truth Archaeology Limited makes the following recommendations in regards to AIGh-75:

- The archaeological deposits at AIGh-75 have cultural heritage value or interest and require Stage 4 mitigation (S&G 3.4 S1e).
- After careful consideration the proponent determined that a combination of site protection of the eastern portion of the site including the core, and excavation of the western part of the site is the preferable approach to mitigating the AIGh-75 site (Figure 21). Specifically, the Stage 4 excavations should cover the portion of the AIGh-75 site that lies within the proposed development and the adjacent portion of the site to the east which lie within 5 metres of the rear lot lines of the cottage lots (Figure 21). These excavations should include block excavation of units in the core of that part of the site, which is considered to be the unit in that area with the highest artifact count, N410 E180. Also, block excavation should occur around Feature

1, the barn well.

- The Stage 4 archaeological excavation must adhere to the requirements of the 2011 Standards and Guidelines for Consultant Archaeologists (MCM 2011), specifically S&G 4.2.1 (General requirements for the excavation of archaeological sites).

- Avoidance and protection of AIGh-75 will involve several steps including:

(1) The site limits must be accurately surveyed, including a 10m buffer zone, and placed on the registered plan for the property with long term protection including proscriptive zoning.

(2) The local approval authority (Municipality of the County of Prince Edward County) must be made aware of the site and must formally acknowledge the protection of the site.

(3) All on-site construction crews, engineers, architects or others must be issued “no-go” instructions regarding the archaeological site and the proponent must prepare a letter acknowledging the site and committing to its long term protection.

(4) The location of the area to be avoided (site plus 10 metre buffer) must be shown on all contract/engineering drawings when applicable, including explicit instructions or labelling to avoid the site. Construction phase fencing should be erected around the perimeter of the buffer zone.

(5) If construction is to occur in close proximity to the buffer zone the construction activity must be monitored by a professional archaeologist and a report submitted to the Ministry of Tourism, Culture and Sport documenting the effectiveness of the avoidance strategy in ensuring that the area to be avoided remains intact.

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,

Andrea Williams
Archaeology Review Officer

cc. Archaeology Licensing Officer
Steve Ward,private
Matt Coffey,Corporation of the County of Prince Edward, Planning Department

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.