



The Ontario Archaeological Society Inc.
encouraging the ethical practice of archaeology

January 20, 2020

Kendra Couling, Park Planner
Ontario Parks, Southeast Zone
300 Water St, 4th F. N.
Peterborough, ON
K9J 3C7
Phone: (705) 313.6491
Email: planning.sez@ontario.ca

RE: Sandbanks Provincial Park Management Plan: amendments to enable building demolition (ERO019-0977) and Public Notice for Category B Project Evaluations

Dear Ms. Couling,

On behalf of the Ontario Archaeological Society (OAS), thank you for your posting notice of proposed changes to the Sandbanks Provincial Park Management Plan to allow for building demolitions and the demolition of two buildings in particular. We are grateful for the opportunity to provide some comments in an effort to help support and strengthen the plan with respect to cultural heritage.

Several activities associated with building demolition have potential risks to impact current grade and areas of archaeological potential. Such activities include (but are not limited to) removal of at-grade and below-grade infrastructure and/or utilities, use of heavy equipment over loose or saturated soils, and grading and/or landscaping after demolition. Archaeological sites can be present at and immediately below ground surface. As a result, demolition activities can inadvertently impact previously undiscovered archaeological resources if a proactive archaeological assessment is not undertaken in advance.

As a result, it is the opinion of the OAS that a Stage 1 or Stage 1-2 archaeological assessment at minimum is required prior to these demolitions. This is consistent with the *Technical Guideline for Cultural Heritage Resources for Projects Planned Under the Class Environmental Assessment for*

Provincial Parks and Conservation Reserves. The presence of heritage buildings, along with several other criteria for archaeological potential outlined in the 2011 *Standards and Guidelines for Consultant Archaeologists*, increases the potential for archaeological sites within the vicinity of the buildings.

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1444 Queen St. E., Suite 102
P.O. Box 62066, Victoria Terrace Post Office
Toronto, ON M4A 2W1
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An archaeological assessment should also be considered as one of the mitigation measures for the cultural heritage impact of removing these two buildings. This assessment may provide additional insight into the cultural heritage value of the buildings and surrounding area; information that would strengthen any commemoration and interpretation being considered as part of mitigation efforts.

The 1992 Sandbanks Park Management Plan has a strong baseline in addressing cultural heritage. It states that “a cultural resources management plan will be developed to guide the management of the cultural resources of the park”. Archaeology is explicitly highlighted with respect to Historic Zone 1: Lakeshore Lodge. This section identifies the need for “protection of known and potential archaeological sites”, that “opportunities for archaeological research will be sought and will be guided by the recommendations of the cultural resources management plan”. However, this is not the only area within the park that is likely to retain potential for archaeological sites, and it is unclear whether a cultural resources management plan has since been completed. Such archaeological provisions should be applicable in all zones, and areas of archaeological potential should be identified across Sandbanks Provincial Park.

In addition to the requirement for an archaeological assessment in advance of the proposed demolitions, the OAS strongly recommends that an Archaeological Management Plan (AMP) or comprehensive Stage 1 archaeological assessment be completed for the park as a whole. This need for a comprehensive assessment of archaeological potential and an associated management plan is also supported in the 1991 *Sandbanks Provincial Park Cultural Resources Study*.

A Sandbanks Provincial Park AMP, or a comprehensive Stage 1 assessment, would be an invaluable resource for supporting effective long-term conservation and management of archaeological resources going forward. It would provide additional guidance alongside the park management plan for considering future park development, improvements and permitted uses, and how to mitigate potential impacts to archaeological resources. Such a study would not only identify known sites but also identify areas with potential for archaeological sites, allowing the park to achieve its goals for proactive conservation and preventing the loss of cultural heritage resources wherever possible.

The OAS also shares concern regarding pressures and challenges facing cultural heritage resources from erosion, dune activity and other environmental changes. With our changing climate, this increasingly poses risks for inadvertent impacts or exposure of archaeological resources and burials. An AMP would address proactive measures for stabilization where possible, and establish contingency plans for mitigating naturally exposed archaeological resources.

The OAS also strongly supports the inclusion of consultation with Indigenous Communities within the planning documentation. We recommend establishing specific policies with respect to Indigenous consultation and engagement, including archaeological assessments and sites, which could also be included as part of a Stage 1 assessment or an AMP.

Overall, the OAS cannot express enough the value of an AMP and the importance of undertaking archaeological assessments in advance of demolition activities, especially as part of mitigation measures for the removal of cultural heritage buildings. We provide these comments in an effort to help further support and strengthen cultural heritage conservation within the updated Sandbanks Provincial Park Management Plan.

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Please feel free to reach out to me should you wish to discuss any of these comments in more detail. We would very much like to be notified of any further postings or updates, including the Category B Notice of Completion. We look forward to working with you further.

Sincerely,

Abbey Flower
Director, Heritage Advocacy
Ontario Archaeological Society

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