

Association of Professional Archaeologists

Newsletter Autumn, 1999

APA NEWS

I hope that everyone had a good summer. There has been something of a boom in consulting work this year which should make many of us happier. A number of positive changes are taking place here at the APA. Secretary Andrew Murray has nearly completed the first APA WEB PAGE, which should be accessible in about one month. Watch for a notice of our new WEB address!!!

Director Donna Morrison is also putting out the first call for papers for the New APA Electronic Journal! We invite journal length articles on archaeology in eastern Canada and the northeastern United States. Publication of our first issue is scheduled for July 2000 so keep your membership current!

Executive Changes

President Gary Warrick, after four years of service, is "on leave" from the APA to take up teaching duties at the new Brantford Campus of Wilfrid Laurier University. We all wish Gary success in this exciting new endeavour and in setting up a research program for the Grand River Valley. The rest of the APA Executive will be handling Gary's duties for the remainder of his term.

Rescheduled Conference

The announced APA Symposium: **Archaeology 2020** has been rescheduled for the spring of 2000. In view of the MczCR co-sponsored Heritage Tourism Symposium (September) and the annual OAS Symposium (October) in Waterloo, the APA Executive decided to move back our symposium to enhance attendance at all three events. We hope that this move is successful. Watch for further announcements of speakers and their papers for **Archaeology 2020**.

Call for Nominations

Hard to believe but another two years have already zipped by and it is time for paid-up APA members to send in their nominations for the 9 APA Executive positions for 2000-2002. Positions to be filled are: President, Vice-President, Newsletter Editor, Grievance Co-ordinator, Secretary, Treasurer and three Directors at Large. All nominations must be of members in good standing and be made in writing to:

The Secretary, APA, Box 404, Peterborough, Ontario K9J 6Z3. All nominations must be received by October 10, 1999.

Newsletters 1999

With this issue of the APA Newsletter, we are starting to catch up on our 1999 series. Stay tuned for our next issue, which we hope to have out in about six weeks, which we are devoting to the fun subject of **Trans-Oceanic contacts** in North America. From the Peterborough Petroglyphs as Viking touchstones to Barry Fell's stone root cellar Druids of New England, we hope to provide just a little bit of light entertainment for a change. Contributions on this subject are very welcome!

Consultant and Crew Member Wages

The APA Executive has been receiving a number of comments about low field crew wages in the consulting industry. We encourage our members to pay "living" wages to qualified staff (meaning they should rise well above provincial minimum wage). Raising staff costs may also encourage the industry as a whole to get away from the cut-rate mentality of most work to the lowest bidder. We certainly don't need to cheapen our profession any further since it is the lowest paid of all the consulting industries yet often requires more university training. Comments from APA members on how to address this problem would be very welcome. Please send them to: **Dr. Lawrence Jackson, Vice President, APA, Box 404, Peterborough, Ontario K9J 6Z3** or by e-mail to: ljnortheast@sympatico.ca

That is it for now. Remember, if you want to get in touch with any of the APA Executive, you can send news to us by e-mail at: apaontario@kawartha.com

If you would like a copy of the **APA Consultants Directory** just send a request.

Membership fees for full members are being held at \$35.00 for the year 2000, Associates (non-voting) at \$30.00 and students (non-voting) at \$20.00. (Oh yes, by special request of Paul Lennox, we are offering a special three year full membership for \$100.00). Keep in touch.

Lawrence Jackson, Vice-President

COMMENTS ON STAGE 4 QUESTIONNAIRE RESULTS (INCLUDING STAGE 3 SITE-SPECIFIC INVESTIGATIONS)

Submission from: Lawrence Jackson and Andrew Murray, Subcommittee on Consulting Practices, the Association of Professional Archaeologists.

Introduction

We would like to initiate this set of detailed comments on the Stage 4 Questionnaire by first commending the Ministry of Citizenship, Culture and Recreation for attempting to develop a rigorous set of standards for the practice of archaeology in Ontario. This is not an easy task or one which invites positive feedback from practitioners. We hope, therefore, that the following will be regarded as constructive comments, recognizing the successes and failings of the system, its administrators, and, especially, the practitioners or field archaeologists.

This document was prepared as a result of a number of discussions at Executive meetings of the Association of Professional Archaeologists over the past six months and was assigned to Jackson and Murray as a task requiring urgent comment. Both authors have extensive field experience in Ontario providing a basis for comment. This was substantially augmented by conversations with many other licenced Ontario archaeologists, including members of the APA Executive.

Discussion will follow the order of the Stage 4 Questionnaire results as presented by Neal Ferris in OUT OF THE FIELD NOTES No. 1, September, 1998 (Section A) and No. 2, March 1999 (Sections B and C). This paper is Part One and presents comments on Neal's questionnaire Section A. Part Two (look for it next issue) will comment on Section B and C results.

DETAILED COMMENTS: SECTION A

A1. We are relieved to note that most archaeologists in Ontario use multiple criteria for determining site significance. Although methods vary, there does seem to be at least some consensus that a strong surface scatter and diagnostic tools necessitate Stage 3 investigation. What is of great concern to us is the variability in MINIMAL conditions for walking away from a site at the conclusion of Stage 2. It is also disturbing that different individuals, in communication with different plans review officers, CAN experience vastly different requirements when recommendations on whether to proceed or not are

made to MczCR.

Examples: One consultant in south-central Ontario has been required to put in sets of one metre test units around isolated finds in cultivated fields. The significance of some of these finds is sites as insignificant after surface collection only. One instance which comes to mind is a Hamilton area site with more than 60 surface artifacts (including tools) in a 100 by 100 metre area which was written off as requiring no further work.

While we clearly recognize that it is not the business of MczCR staff to dictate methodology to licenced archaeologists, there is obviously too much variability in our practices. This translates into a form of discrimination in favour of businesses which do too little field work. What is the proper role of MczCR in such situations? Can we achieve greater consistency in the professional assessment of sites without sacrificing the resource to monetary concerns?

Recommendation:

Even though there are published minimal standards for proceeding to Stage 3 and 4 site investigations, we would recommend the following:

- 1). Regular discussions between plans review officers to determine what acceptable minimum standards mean and apply them across the province.
- 2). Periodic review of Stage 3 and Stage 4 recommendations by all consultants in Ontario to determine if there are individual patterns detrimental to the resource base.
- 3). Periodic review of the archaeological sites database by the data co-ordinator to determine on a region by region basis if enough Stage 3 and 4 work is being done to provide adequate sampling by period or site type.

A2. There appears to be consensus on the need for controlled surface pick-up (CSP) or mapped surface collection at any site. However, we are concerned

about the 7% of respondents who do not do this and the implications for both business success and the resource base of not being required to carry out this basic operation. This appears to be of minor concern. However, the published comment in the questionnaire results that 22% conduct only grab-bag collections of historic sites needs attention. There is a very definite lack of standards for 19th century sites and for determining their significance.

Example: One consultant working in the Ajax-Pickering area recommended clearance of an historic house foundation after Stage 3 sampling and invited the plans review officer to set standards or provide reasons not to give clearance. The site was, surprisingly, cleared. Directly across the road from the property in question, a second consultant was required to carry out Stage 4 investigation of a similar 19th century house. The lack of sampling guidelines for historic sites has allowed enormous divergence of opinion on significance.

Recommendations:

1. We strongly recommend that MczCR immediately engage an historic archaeologist to review the significance of historic sites being lost in Ontario.
2. Sampling guidelines are urgently needed for historic sites and MczCR should issue a guide-sheet on sampling of ceramics, metals, etc., both for surface collection and Stage 3 and 4 work. This will facilitate BOTH minimal identification of the site, its age and its significance AND establish a data-base which will, in future, allow archaeological generalizations or trend analyses.
3. A scale of significance for different kinds and ages of 19th century (and early 20th) sites urgently needs to be established for the use of Ontario archaeologists. The APA is currently preparing standardized sampling guidelines for its members and has, in the past, addressed historic concerns by workshops and our Hamilton symposium.

A3. The recording of CSP artifact scatters appears to be generally satisfactory. However, as noted by one respondent, integration of CSP with excavation results is rare. Since time constraints and maximizing information returns are usually the culprits here, we can suggest only that greater effort be made to ensure that diagnostics are discussed with excavated

materials.

A4. Determining significance of plough disturbed sites appears to be one of the most difficult areas in which to make an informed decision. We have several concerns with the results for this question. Firstly, there seems to be a trend in the responses received that there is a specific and consistent way to determine if a site warrants further excavation. The problem with such statements, as with most models used in Ontario, is that, unless you go ahead and excavate the site, you will NEVER KNOW what was there. Abandoning any site should always leave the archaeologist feeling uneasy.

Examples: Jackson and Murray offer four examples from their experience regarding surface indications and site significance. Each illustrates the folly and arrogance of assuming KNOWLEDGE from surface indications. In 1987, discovery of three flakes of Collingwood chert at the Halstead site on the south shore of Rice Lake led to further search of the ploughed field. Nothing else was found. Current consulting practices would write-off this site. Subsequent excavations produced a complex sample of unifacial and bifacial tools and debitage, as well as two Palaeo-Indian features. Similarly, a 1989 survey of a location on the north shore of Rice Lake produced three flakes of Collingwood chert after the farm had changed hands and modern machinery was first brought on-site. Jackson had previously surveyed this field dozens of times between 1976 and 1989 but never found Collingwood chert. Again, excavations revealed a unique Gainey phase site with abundant unifacial tools, debitage and three Palaeo-Indian features. Finally, during a 1976 survey on the north shore of Rice Lake a small garden was surface surveyed and produced a handful of lithics. Excavations documented the most thoroughly dated Early Woodland camp in south-central Ontario and a wealth of data on Vinette 1 ceramics and feature use.

Murray notes that the Salgo site was originally identified from artifacts in a farmer's collection. Surface inspection by an archaeologist yielded only one ceramic sherd and five chert flakes. Twenty-one one metre test units recovered only 12 additional sherds, a pipe fragment, eight chert flakes, and one retouched flake. Despite this low recovery rate, the archaeologist had the site stripped of topsoil to reveal a single Uren period house 24 metres by 7 metres with eight features, including a single hearth. Corn fragments were recovered and were AMS dated. This

site is one of the very FEW cabin sites known east of London.

Using the criteria espoused by one questionnaire respondent - that 25 artifacts determines significance - NONE of the above HIGHLY SIGNIFICANT sites would have been discovered. It is important to note that the potential to miss significant sites stretches across many time periods and regions of the province and is not limited to these few examples. Unfortunately, we have seen that surface collection methods can be poor or inappropriate since a 10 metre survey interval, which misses most hunter-gatherer sites, can often be justified among some consultants. Some colleagues also note that if you walk quickly enough you won't find much.

Recommendations:

1. Staff of MczCR should inventory all Stage 2 recommendations for the past 5 years and determine what patterns are present and if all consultants are finding similar proportions of sites and site types in high and low density site areas.
2. Specific guidelines are needed for particular kinds of discoveries such as Collingwood chert, rare pottery such as Vinette 1, or other objects which tend to occur in limited numbers yet can indicate a very significant site type. Appallingly few Early Palaeo-Indian sites have been discovered by consultants despite the fact that hundreds of such sites must be present in prime development locations in south-central and southwestern Ontario.
3. Since some types of sites may consist ENTIRELY of 25 artifacts or less, we need to recognize that arbitrary cut-offs need to be tempered with good judgement.
4. 10 metre survey intervals should be done away with. There is no reason not to surface survey at an interval which will actually RECORD small and significant sites. It is not appreciably more costly to do 5 metre survey which is much more efficient finding sites.

A5. When determining size of test units, respondents were quite variable invoking a variety of factors including time constraints to determine what was

done. We find this unacceptable since sites can easily be given short shrift and since the APPEARANCE of methodical testing is easy enough to produce if the argument and graphics are persuasive. The bottom line should be AREA SAMPLED versus MINIMUM POSSIBLE SITE SIZE.

Example: When testing a site with a possible minimum area of 100 by 300 metres, is it appropriate to use 25 cm test units at 10 metre intervals? We would suggest that this method could only be applied with any conscience to an exceedingly large and rich site where returns are likely to be large in most units. Sampling requirements (in terms of artifact numbers and categories of artifacts) should be satisfied. Such a sampling strategy on an Early Archaic camp, however, would be highly inappropriate.

Recommendations:

1. MCzCR staff should pay careful attention to possible minimum site size and the proportion of the site tested by test units. There is far too much variability allowed between individual consultants. If the PROPORTION of a site tested is less than a certain percentage, then further scrutiny is required. Shown a site scatter map with 5 Stage 3 test units, one consultant declared HE would have had to excavate 40 metres to satisfy MCzCR staff.
2. Field archaeologists should examine their methodology in the light of area present versus area sampled and make appropriate modifications in strategy. It appears that the dictates of business efficiency are dictating excavation plans to the detriment of GOOD ARCHAEOLOGY. These are management level decisions which are, to the misfortune of future archaeologists trying to make sense of our data bases, being approved too often. We need to be more assertive with clients about OUR minimum standards.

A6. Although a majority of archaeologists (77%) agree that test units are appropriate for sites identified as requiring Stage 3 investigation, we are deeply concerned about the 23% who do not and by the quoted comment that test excavation is only warranted where CSP does not answer questions of significance. We would respond that a CSP can NEVER answer questions of significance because it is such a limited tool. A CSP can produce

Stage 3 decisions to write off sites. Decisions to break off Stage 3 or 4 excavations at arbitrary cut-offs, as seen in published articles on sites with artifact counts approaching 100 in single test units, emphasize the need to review practices.

2. Archaeologists ensure that their staff are adequately briefed and in communication with management on Stage 3 and 4 decisions. A phone call is not that difficult these days and can avert small disasters. Regular updates are normally a part of any management-staff interaction. It is not necessary to LICENCE Stage 3 staff as this will NOT SOLVE the problem of poor management decisions and will contribute to the proliferation of licences in an industry which is already over-serviced.
3. We would like to suggest that the APA could work in tandem with MCzCR to provide voluntary monitoring of on-going excavations. A simple announced site visit would do wonders to improve performance and management skills.

SUMMARY

If we had to summarize by a single statement what is wrong with Ontario archaeological consulting, we would say that a lack of understanding of what

constitutes scientific sampling is endemic. There are far too many self-fulfilling methodologies in evidence at management and report writing levels for us to believe that field staff create the bulk of problems. It is far easier to address staff qualifications than it is to address poor sampling practices. One example of a major impact caused by poor understanding of sampling is the use of various site potential models to eliminate areas for consideration. As far as we are aware, there has not been a single comprehensive test program for any such model - it is simply assumed to be correct from extant knowledge which makes use of that model. This is VERY POOR SCIENCE. Future generations will take us to task for the simple minded way in which we have allowed untested models to dictate decisions on searching for sites, saving sites, and destroying sites.

The APA would like to recommend that MCzCR work with the community developing scientifically acceptable sampling techniques rather than modifying policy to suit practices. We are aware that economic concerns drive the industry. However, that does not prevent us from attempting to sample, as one noted statistician once said, in the best possible way that we can.

MCzCR archaeological assessment report review checklist.

One example of an MCzCR archaeological assessment report review checklist has been provided to us by Chris Andersen. Chris points out that this checklist has been developed by him, based entirely on the Archaeological Assessment Technical Guidelines, for his own reviewing of reports. It is by no means to be interpreted as an official MCzCR

document, but merely as an aid to consistent reviewing of reports. One further note by Chris is that copies of the checklist have previously been circulated to some consultants, whose assessment reports had improved as a result.

The checklist is reproduced on the following pages for the review, use and interest of our members.

Archaeological Assessment Report: Review Checklist

Name of Licensee/Consultant: _____ License No.: _____ CIF No. _____

Title of Report: _____

Project No.: _____ T-Number: _____

Date Received: _____ Date Reviewed: _____ Date Approved: _____

Cover Page

- | | ✓ | N/A |
|---|--------------------------|--------------------------|
| 1. T-number and property name, or other reference which identifies the project type | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Location of Project (Municipality, Lot, Concession, etc.) | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Name and Address of Client (if corporate, include contact name and phone #) | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Name and address of Consulting Firm (or licensee) and Project # (if applicable) | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Archaeological License # and CIF # | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Date of Report Completion | <input type="checkbox"/> | <input type="checkbox"/> |

Introduction and Background

- | | | |
|--|--------------------------|--------------------------|
| 1. Names of field director, survey crew members, analysts and authors (this can be on separate project personnel page) | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Purpose of Project | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Results of Stage 1 Investigations and rationale for determining areas of potential | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Dates and duration of field activities (distinguishing between Stages 2 and 3 if not conducted at the same time) | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. <i>Details of any departures from info. on licence application (Licence Report only).</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. <i>Statement that licensee had permission of property owner to enter lands and conduct research</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. <i>Statement that all artefacts recovered were removed with the permission of the landowner</i> | <input type="checkbox"/> | <input type="checkbox"/> |

Assessment Methodology

- | | | |
|--|--------------------------|--------------------------|
| 1. Description of environmental setting and landscape, incl. ground cover and weather conditions during survey | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Description of any prohibitive conditions limiting the area surveyed | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Description of field methods employed including: <ul style="list-style-type: none"> • total area surveyed • breakdown by technique and spacing • any intensification when remains were encountered | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Any deviation from minimum standards, include identification and justification | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. If no artifacts were found in Stage 2, this should be explicitly stated | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. <i>Description of lab. methods and findings (Licence report only)</i> | <input type="checkbox"/> | <input type="checkbox"/> |

Archaeological Findings

- | | | |
|--|--------------------------|--------------------------|
| 1. Description of environmental setting for each site identified | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Extent of intensified (Stage 3) investigations, including: <ul style="list-style-type: none"> • methods used to define and map site limits • areal extent of surface collection • total area and depth of excavations and nature of yields | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Nature of recovered artefact and ecofact assemblage for each site, include catalogues | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Depositional history of site, include disturbances and occupational chronology | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Spatial and temporal relationship to other sites in the area | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. <i>Statement of results with reference to the reasons for the project, as per application</i> | <input type="checkbox"/> | <input type="checkbox"/> |

Graphics (N.B.: All maps and figures, where appropriate, should include north arrows and graphical, not numerical, scales.)

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|--|--------------------------|--------------------------|
| 1. Map showing regional location of the property | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Development project map, or equivalent, showing: <ul style="list-style-type: none"> • variations in ground cover and topography • zones of archaeological potential • areal extent of pedestrian survey • areal extent of test-pitting • extent of disturbed areas not subjected to field assessment | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Map showing exact location of all sites/findspots, etc. | <input type="checkbox"/> | <input type="checkbox"/> |

diagnostics or show tool and debitage distributions. However, it does not reveal the presence or absence of features on any consistent basis and can be quite deceptive depending on what portion of the site may be brought to the surface at any one time. There are too many known examples of consultants testing just off-site or on the edges of lithic scatters to obtain a quick clearance. Once Stage 3 testing has been approved for clearance there will NEVER be a chance to prove this decision wrong.

Example: A CSP in 1994 of the Pickering age Five Acre Field site in Burlington produced no recognizable scatter pattern which would indicate a village. Nevertheless, fence row excavations confirmed the presence of village settlement pattern which had been totally destroyed by ploughing and wind erosion in the cultivated field area. Stage 3 and Stage 4 excavation of a fence-row is an unusual decision and the potential here was recognized by the senior archaeologist of MTO central region. By the reasoning of the 23% of respondents who did not agree with Stage 3 testing for such limited samples, this site would have been missed (although earlier researchers had, in fact, noted its potential).

Recommendations:

1. Any site which produces surface material indicating the presence of an activity area, of any size, should be subject to Stage 3 testing.
2. MCzCR plans review officers should NOT permit the writing off of ANY activity area based solely on a CSP.
3. More care should be exercised in checking reports, not for format, but for the accuracy of the archaeological methodology - i.e. did the consultant actually test the MAIN site area.

A7. We are deeply concerned, as an organization, that 80% of responding archaeologists do not see intensified test pitting as a valid strategy equivalent to a CSP. How is an unploughed site to be defined if NOT by intensified test pitting. We suspect that the problem here is that the SIZE of test pits is INADEQUATE to the sampling task. The problem is convincing archaeologists to excavate larger tests and the economic implications of such a decision. There is no monitoring of how well shovel tests are excavated, even at their present modest size.

Example: Since archaeology and archaeological consulting are practices based on SAMPLING to produce cultural inferences, inferior sampling practices will produce inferior data. We believe that this is the case with shovel tests in Ontario. What is the VOLUME of a shovel test versus the VOLUME OF SOIL in an area to be tested? With a 5.0 metre test interval, we can calculate, based on an average 30 cm soil depth, a volume of 7,500,000 cubic centimetres to be tested. A standard shovel test is no more than 30 cm in diameter and samples about 90 CUBIC CENTIMETRES. This means that the SAMPLING PROPORTION is actually .0012%. Little wonder that we find so little with shovel tests!!

Recommendations:

1. Increase the size of a standard shovel test to at least 35 cm diameter.
2. Recommend an arbitrary requirement for supplemental 50 cm test units when shovel tests are positive (even single flakes can denote sites).
3. Strongly recommend excavation of test units around ANY positive shovel test.

A8. Again, we are deeply concerned by the perception of some of our colleagues that test units are not a necessary part of Stage 3 investigations. What is a Stage 3 if it does not involve testing? Intensified shovel testing? This is clearly inadequate to the needs of almost any site. We most strongly agree with the one respondent who recommended a minimum of one metre test unit ANYTIME an artifact is found in a test pit. What self-respecting archaeologist needs to have 10 positive test pits to warrant test unit excavation? This approach clearly will abandon MOST small sites to destruction and will miss an uncomfortable number of large sites.

Example: Stage 3 excavations of a strong Early Archaic surface scatter in Peel Region in 1994 completed only 5 one metre squares. All five were entirely outside of the central surface recovery area. Despite the predominance of Haldimand chert in the chipping debris and recovery of a Nettling point on the surface, the site was written off. With it went a significant opportunity to learn more about Early Archaic southern Ontario. Interestingly, there were no photos of field conditions and no photos or drawings of artifacts in the approved report.

Recommendations:

1. MCzCR staff pay closer attention to Stage 3 recommendations in reports and focus less on format. A nicely formatted report is OF NO USE when the important archaeology is severely compromised by incompetent methodology or inappropriate recommendations. MCzCR staff and consultants as well need to consistently examine their methodological practices if the pace of site loss is to be slowed.
2. For Stage 2 shovel tests, we recommend that a minimum of one 1m test unit be excavated on ANY site with two or more positive shovel tests. An intensified shovel test pattern must also be excavated around EVERY positive shovel test.
3. MCzCR staff should carefully review current practices as they allow for a great deal of inadequate sampling. Use of untested POTENTIAL models and ZONES OF POTENTIAL should be discouraged until such time as at least ONE such model is field tested.

A9. We are greatly encouraged by the apparent consensus among our colleagues that we should be moving away from use of heavy machinery in Stage 3 site evaluations. We suggest that the single logical exception would be using such machinery to locate grave shafts in suspected cemetery areas. We do not regard use of heavy machinery as an acceptable strategy to define site limits (other than for cemeteries) since it is inherently destructive. Once a site is destroyed no data can be brought to our attention to question the decision.

Example: Jackson and Morrison (1997) report on Stage 3 and 4 excavation decisions at Archaic sites in Ancaster, Ontario and note that use of heavy machinery exposed the only decent feature found in over 1200 metres of small site excavations. However, all or any associated artifacts were forever lost in exposing the feature. Other archaeologists could provide similar examples. Plough zone excavations elsewhere on these sites discovered rare and highly significant Narrow Point occupations.

Recommendations:

1. Any use of heavy machinery be discussed with

MCzCR staff prior to use.

2. Test units be substituted for heavy machinery in defining site limits or, at a minimum, be used in conjunction with heavy machinery to SAMPLE what is being lost.
3. Screens of larger mesh size can be used effectively and economically to clear peripheral site areas instead of machine stripping or at least to augment machine stripping.
4. APA members will gladly INVITE MczCR staff to visit their sites in progress to learn what methodologies are being used.

A10. We do not question the need for minimum standards of excavation but these are already in place with archaeological licensing. We believe that the REAL problem is not the qualifications of field staff but the nature of management decisions spurred by economic considerations. So many of the problems which we see in Ontario archaeological consulting can be tied to MANAGEMENT rather than field staff. It does not take a genius to recognize an artifact or to carry out a testing program as per instructions. If staff are put in the field WITHOUT any instructions, of course, and with minimal experience, problems could occur. However, we see the largest and most significant problems being those of sites written off at the Management or even MCzCR staff levels. THERE IS NO CONSERVATION ETHIC TO SPEAK OF IN ONTARIO CONSULTING AND NO INCENTIVES TO INVESTIGATE SMALLER SITES OR TO SET ASIDE SITE AREAS FOR FUTURE WORK.

Example: The Ontario Archaeological Society has recently drawn attention to the case of the Old Mill site, near the Humber River, in Toronto. Although apparently assessed by an archaeological consultant and cleared by MCzCR staff, there are significant heritage concerns with this property. Not just with standing architecture but with archaeological deposits as well. There are no mechanisms in place for addressing poor decisions which clear properties.

Recommendations:

1. MCzCR immediately review policies regarding site conservation and acceptance of Stage 2 or

- | | ✓ | N/A |
|---|--------------------------|--------------------------|
| 4. Maps of sites subjected to Stage 3 investigations, showing: | | |
| • physical setting | <input type="checkbox"/> | <input type="checkbox"/> |
| • site extent, including mapped artifact locations | <input type="checkbox"/> | <input type="checkbox"/> |
| • locations of all test units in relation to surface finds | <input type="checkbox"/> | <input type="checkbox"/> |
| • location of permanent site datum | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Photographs of any disturbances or difficult field conditions | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Photographs and/or drawings of representative and diagnostic artifacts, w/scales and cat. #s | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. <i>Representative series of plan and profile drawings</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. <i>Representative series of site photographs</i> | <input type="checkbox"/> | <input type="checkbox"/> |

Evaluation of Site Significance

- | | | |
|--|--------------------------|--------------------------|
| 1. Statement evaluating the significance of any site(s) found, addressing: | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>Information Potential:</u> | | |
| • Site integrity | <input type="checkbox"/> | <input type="checkbox"/> |
| • Relative rarity | <input type="checkbox"/> | <input type="checkbox"/> |
| • Cultural-Temporal affiliation(s) | <input type="checkbox"/> | <input type="checkbox"/> |
| • Potential data productivity | <input type="checkbox"/> | <input type="checkbox"/> |
| • Temporal and spatial context | <input type="checkbox"/> | <input type="checkbox"/> |
| • Potential for presence of human remains | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>Perceived Value Potential:</u> | | |
| • Perceived value to the local community or interest groups | <input type="checkbox"/> | <input type="checkbox"/> |

Report Recommendations

- | | | |
|---|--------------------------|--------------------------|
| 1. If nothing was found, request for clearance | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. If significant remains were found, a detailed mitigation strategy | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Recommendations concerning short and long-term curation of collections & documents | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Statement requiring MCZCR notification of deeply buried remains | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Statement re: discovery of human remains | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. <i>Recommendations or plans for follow-up work</i> | <input type="checkbox"/> | <input type="checkbox"/> |

N.B. Asterisked (*) items must be completed in order to fulfil licensing requirements.

Comments: