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Section 12 Site Alteration Permit Assistance
Aboriginal Trail Network Studies
Workshops and Archaeological Training
Remote Access to Archaeological Data (RAAD)

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**Attn:** David Fullbrook

Merchant House Capital 2661 Fulford-Ganges Road Salt Spring Island, BC V8K 1Z4

Email: david@merchanthousecapital.com

RE: Summary of mechanically assisted archaeological impact assessment of the proposed Fulford Inn, located at 2661 Fulford-Ganges Road, Salt Spring Island, BC - HCA Heritage Inspection Permit 2018-0285

This letter presents a summary of a mechanically assisted archaeological impact assessment (AIA) for the proposed Fulford Inn, located at 2661 Fulford-Ganges Road on Salt Spring Island, BC. The AIA was conducted by Kleanza Consulting Ltd. (Kleanza) at the request of Kris Brawley, on behalf of David Fullbrook of Merchant House Capital, under a *Heritage Conservation Act (HCA)* Section 14 Heritage Inspection Permit **2018-0285**.

On October 11, 2018, Kleanza Field Director and Permit holder Rob Field, accompanied by First Nations field technicians Shaun Canute (Cowichan Tribes), Colin Underwood (Tsawout First Nation), and Curtis Claxton (Tseycum First Nation) monitored the machine assisted excavation of six test holes (MT001–MT006) placed outside of the current site boundaries of DeRu-018 (the "Project area"; Appendix I: Maps 1, 2, and 3).

According to the Consultative Areas Database, the Project area is located within the traditional territory of the Cowichan Tribes, Halalt First Nation, Lake Cowichan First Nation, Lyackson First Nation, Malahat Nation, Pauquachin First Nation, Penelakut Tribe, Semiahmoo First Nation, Stz'uminus First Nation, Tsartlip First Nation, Tsawout First

Nation, Tsawwassen First Nation, and the Tseycum First Nation; as well as within the catchment area of the Te'Mexw Treaty Association.

In BC, all archaeological sites that predate AD 1846 are protected by the *Heritage Conservation Act* (*HCA*), RSBC 1996, c. 187, whether on Crown or private lands. Archaeological sites are the physical remains of past human activity. Burials, First Nation rock art sites, and sites which have been designated by the provincial government are protected regardless of age; ship and plane wrecks older than 2 years are also protected (BCAPA 2012) and are still considered important archaeological resources when encountered on federal lands.

### **Background**

The Project area encompasses Lot A, Plan VIP84729, Section 12 and Parcel C (DD38005l) Section 13, all in Range 1, South Salt Spring Island, Cowichan District, BC. (Appendix I: Maps 1 and 2).

The archaeological potential of the area was determined to by high due to several contributing factors. The Project area situated on two terraces overlooking Fulford Harbour and located on the south (right) bank of Fulford Creek. During a Preliminary Field Reconnaissance (PFR) conducted in 2017 (Field 2017), the Project area was found to have high archaeological potential for subsurface cultural materials, due to its location within and near the site boundaries of previously registered archaeological site DeRu-018, as well as the proximity of the Project area to other registered sites (DeRu-44, DeRu-56, DeRu-63, DeRu-166) and to the ocean.

One previously recorded archaeological site (DeRu-18), is located within the eastern portion of the Project area (Map 1 and 2), along the southwestern shore of Fulford Harbour. Site DeRu-18 is a precontact archaeological site featuring surface and subsurface archaeological materials, cultural shell deposit (midden), cultural depressions (house depressions), and ancestral (human) remains.

During the geotechnical monitoring portion of the archaeological impact assessment (AIA) conducted by Kleanza on August 1, 2018, the site boundaries for DeRu-18 were extended to include two small additional polygons within the Project area where cultural shell deposits were encountered in 2 of 5 geotechnical auger tests (Appendix I: Map 2). The results of these tests concur with those of unmonitored geotechnical tests conducted in November 2016 by H2O Environmental (Field 2017; H2O Env. 2016).

### Methodology

On October 11, 2018, Kleanza field director and permit holder Rob Field, accompanied by First Nations field technicians Shaun Canute (Cowichan Tribes), Colin Underwood (Tsawout First Nation), and Colin Underwood (Tseycum First Nation) directed and observed machine-assisted testing of six test holes (MT001–MT006; Map 3) within the Project area (Figure 1). A mini-excavator equipped with a 100 cm wide, flat-edged bucket, was used to remove sediments in controlled lifts of 10-20 cm. Test holes measured 100 cm

wide, by 280 cm long with a depth range between 170 and 215 cm depth below surface (DBS).

All sediments excavated from the machine-assisted test holes were examined for evidence of archaeological materials and remains. When archaeological materials were encountered, the cultural sediments were screened through 0.63 cm (¼ inch) mesh. All tests were recorded with detailed notes and photos and their locations mapped using a hand-held GPS. All screened archaeological sediments were reburied when the test excavations were back filled.



Figure 1: Project area view east at excavation and screening activities

#### Results

The subsurface testing program revealed undulating subsurface stratigraphy across the Project area, with distinct cultural matrix similarities at varying depths depending on the test hole. It was noted that all cultural sediments examined during this mechanically assisted AIA had been previously disturbed. It is assumed that the disturbance was caused by the original road building and presumed infilling of the local estuary, and by historical construction and demolition of the former Fulford Inn and related structures such as parking lots and driveways. Archaeological materials were found in association with historical refuse and include mineralized metals, bottles, bottle glass, and plastics. Although the materials found are in a disturbed context, it should be noted that archaeological deposits remain legally protected under the *HCA*.

Three of the machine test holes were negative (MT001, MT002, MT003), for archaeological deposits, and three of the machine test holes were positive (MT004, MT005, MT006). See

below for detailed descriptions of the positive tests.

#### MT004 - Positive test

Machine test location MT004 was determined to be positive but disturbed, with archaeological materials and historical refuse being found in combined context. A formed tool (side notched point) was recovered from this test between 160 -170 cm DBS (Figure 2; Appendix 2: Artifact Catalogue). Stylistically, the point dates younger than 1400 years old (Carlson and Magne. 2008) and a similar point was dated to 330 BP +/-80 (Carlson and Magne. 2008). Test dimensions measure 100 cm wide by 280 cm long, with a maximum depth below surface of 195 cm.

# Stratigraphic description (dbs):

0-15 cm: Sod layer (grasses and rootlets)

15-80 cm: Medium brown sand with historical refuse 80-155 cm: Medium brown sand with organics (roots)

155-160 cm: Black silt

160 – 170 cm: Black silt continues. Diagnostic lithic point recovered (Figure 2) 170-190 cm: Black silt continues. Historical refuse noted (Stone wear,

mineralized metals, glass bottles) 190 – 195 cm: Sterile grey clay



Figure 2: Test MT005 - Side notched lithic point recovered with historical refuse

#### MT005 – Positive test

Machine test location MT005 was determined to be positive but disturbed, with archaeological materials and historical refuse being found in combined context. Cultural shell deposit was noted at 43 cm DBS (Figure 3). Test dimensions measure 160 cm wide by 280 cm long, with a maximum depth below surface of 80 cm. This test was abandoned at 80 cm DBS because of proximity to the septic field and associated sanitary lines.

# Stratigraphic description (dbs):

0-12 cm: Sod layer (grasses and rootlets)

12-43 cm: Medium brown sand with historical refuse

43-75 cm: Black silt with whole and fragmentary shell (cultural shell deposit)

75-80 cm: Imported sand fill with historical refuse around septic-field pipes

(Figure 3).



Figure 3: Test MT005 - Cultural shell deposit (midden), and imported sand (note ABS pipe; lower left of frame)

#### MT006 – Positive test

Machine test location MT006 was determined to be positive but disturbed, with archaeological materials and historical refuse being found in combined context. Disturbed cultural shell deposit was noted between 125 – 165 cm DBS, featuring organic and faunal materials (Figure 4). Test dimensions measure 170 cm wide by 230 cm long, with a maximum depth below surface of 170 cm.

# Stratigraphic descriptions (dbs):

0-5 cm: Sod layer (grasses and rootlets)

5-15 cm: Loose brown silty sand

15-70 cm: Black silt

70-125 cm: Medium brown sandy silt with historical refuse

125-165 cm: Black silt with Faunal and organic materials (Cultural shell

deposit), with historical refuse (Figure 4).

165-170 cm: Grey sand with shell (Non-cultural beach deposit).



Figure 4: Test MT006 - Faunal material noted between 125 - 165 cm dbs

#### **Discussion and Recommendations**

One registered archaeological site, DeRu-18 was investigated during the monitoring of six machine-assisted excavation test holes. Cultural materials were encountered in three of the six test holes (MT004 – MT006; Map 3). A formed lithic tool was recovered from test MT004, and cultural shell deposits and faunal materials were noted in tests MT005 and MT006.

These positive tests will be used to redefine and extend the northern portion of the registered site boundary of DeRu-18 to the banks of Fulford Creek. A site form update will be completed and submitted to the BC Archaeology Branch to capture the findings of this AIA.

It is Kleanza's understanding that the Project area footprint has been significantly reduced given that proposed cabins will be built on stilts; therefore, diminishing the impact to subsoils.

It is recommended that ground altering activities within the revised site boundary be actively directed and monitored by a qualified archaeologist and at least one First Nation field technician from the involved First Nations communities. This recommendation is made for any future subsurface excavations associated with construction activities within the Fulford Inn Project area. Monitoring may be conducted under the existing Section 14 Permit, **2018-0285**, until its expiry on the 18<sup>th</sup> of May 2020.

Kleanza recommends ongoing consultation with all involved First Nations to determine an appropriate mitigation strategy, should further ground altering activities occur.

#### Closure

This letter summary is intended only to facilitate development planning and was prepared for use by the proponent specified herein. Any third-party use of this report is the responsibility of that third party. This study does not constitute First Nations consultation or a traditional use study and was prepared without prejudice to First Nations Treaty Negotiations, aboriginal rights or aboriginal title.

Please do not hesitate to contact us with any further questions or concerns.

Sincerely,

Rob Field, BA, RPCA Archaeologist

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