

February 10, 2021

Our file: 21-84

Amanda Currie
Park Planning and Business Services Branch
Ministry of Parks, Culture and Sport
3211 Albert St.
REGINA SK S4S 5W6
Email: amanda.currie@gov.sk.ca

Dear Amanda Currie:

**RE: Ministry of Parks, Culture and Sport – Proposed Rental Accommodations at Fort Carlton
Provincial Historic Site:
NW-9-45-4-W3M;
HERITAGE RESOURCE REVIEW**

Thank you for referring this development for heritage resource review. This letter is a revision of HCB File 19-207 which contained two proposed rental accommodation areas (Site A and Site B) that are no longer being considered. The rental accommodation area reviewed under this file number is the current proposal.

In determining the need for, and scope of, Heritage Resource Impact Assessment (HRIA) pursuant to s.63 of *The Heritage Property Act*, the following factors were considered: the presence of previously recorded heritage sites, the area's overall heritage resource potential, the extent of previous land disturbance, and the scope of new proposed land development.

One known archaeological site (FfNp-1 – Fort Carlton) is in direct conflict with the proposed development. Fort Carlton is a historic HBC fur trade post and NWMP post. During its existence between 1810 and 1885, the post went through several rebuilding phases with the current historic site reconstruction situated upon the final post construction phase from 1855-1885. The Saskatchewan Museum of Natural History undertook numerous excavations at the site from 1964-1969 and 1977-1979 which focused on the 1855-1885 post and the Chief Factor's House, with additional searches for the earlier post phases and exterior post activity areas such as gardens and fences. Subsequent archaeological work at the site from the 1980s to the present have involved HRIA studies that have assessed or monitored various development impacts within the park boundaries.

The proposed rental accommodation area is located southeast of the current reconstructed post and south of the parking lot. The southern extent of this development is adjacent to the existing maintenance road. The land has been disturbed by cultivation, landscaping and an existing road, however, there is an intact component of the site under the plough zone. Although remnants of the 1810 HBC and NWC post (La Montee) were uncovered to the west of the 1855-1885 post in the 1960s, the location of the 1835-1855 post had not been verified. In the 1970s, the Museum actively searched for further evidence of these earlier posts on the west and south side of the reconstructed post, establishing a number of grids and stripping a large area. Unfortunately, it is unclear at this time exactly what was found and where they specifically investigated as no final report has pulled this information together. In the 1980s and 1990s, HRIAs were also conducted in the maintenance yard west of the proposed rental accommodation area (permit 88-046) and in the parking lot area to the north (permit 91-34), recovering a number of historic artifacts and features. Stockade walls, garden features, and garbage dumps associated with all the post phases are also known to be present outside of the reconstructed 1855-1885 post. The likelihood that additional intact components of Fort Carlton exist within the proposed development area is moderate to high. Accordingly, as this project may damage or disturb heritage sites, an HRIA is required for the proposed rental accommodation area.

The HRIA, including systematic surface survey and sub-surface test exploration, is a proponent responsibility. The study will first establish the presence of heritage sites within the project area and where suitable site avoidance measures (including right-of-way relocation) may be implemented. If heritage sites are located in unavoidable conflict with the development, the study must also establish the content, structure and significance of those sites, and, on that basis, recommend both the need for and scope of any further study (including archaeological salvage excavation or other heritage management action).

An effective pre-impact HRIA mostly consists of a systematic archaeological survey of the ground for stone features (e.g., tipi rings, cairns, medicine wheels, etc.) and artifacts, and other material remains. The other component of a pre-impact HRIA is subsurface testing of parts of the project area, usually involving the controlled excavation of “shovel probes” or “shovel tests” to identify buried artifacts, features or deposits. In winter conditions where the ground is often obscured by snow cover, as well as frozen to varying depths, methods that remove snow cover without damaging archaeological sites and allow subsurface testing will need to be employed to overcome these impediments, so that an effective pre-impact HRIA may be conducted. Employing methods which involve the careful use of mechanical sweepers, portable blowers, heaters, and other equipment or approaches, may result in higher costs and longer time delays compared to undertaking a pre-impact HRIA in snow and frost free conditions. For this reason, as well as the difficulty in achieving an effective level of heritage management in winter conditions, this office recommends that pre-impact HRIAs are undertaken in snow and frost free conditions. If this is not possible, then the archaeologist conducting the pre-impact HRIA will need to provide a detailed methodology (specific to the location, time of year, nature of development and

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expected archaeological resources in the project area) with their archaeological permit application that would allow for an effective assessment of the potential impacts of the proposed development on the archaeological resources.

The HRIA must be carried out by qualified personnel under an approved investigation permit issued through this office. Normally, a minimum of two business days are required to process a permit application for an archaeological HRIA. However, if the fieldwork is to occur in winter conditions, permits commonly take longer to be approved because of the need to assess the specific methodology proposed by the archaeologist.

If you have any questions regarding these heritage regulatory requirements, please contact Kim Cloutier at kim.cloutier@gov.sk.ca or by calling 306-787-2848. Thank you again for referring this proposed development and for your cooperation in protecting the province's cultural heritage.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Richards". The signature is written in a cursive style with a large initial 'T' and 'R'.

Dr. Thomas Richards
Senior Archaeologist