

10 March 2004

David Hutchcroft  
Project Officer and Heritage Resource Specialist  
Archaeological Planning and Assessment  
Registries Department  
Ministry of Sustainable Resource Management

Dear Mr. Hutchcroft:

I am an archaeologist (MA from UBC and PhD Candidate from UW) currently living on Salt Spring Island. I have been following the progress of the Sablefin Hatcheries Ltd. development at Walker's Hook, and I have some concerns I would like to express.

My understanding of the situation at Walker's Hook is that Sablefin Hatcheries Ltd. has requested an amendment to their current Site Alteration Permit (Permit File # 21100-20/2003-123) with the intention of adding additional trench spurs to connect with the existing large trench. I believe the archaeological site at Walker's Hook (DfRu002) is protected under the Heritage Conservation Act and thus, should have been subject to an Archaeological Impact Assessment *prior* to any development. I do not understand why an AIA was not completed.

Since an AIA has not been completed, the significance of the site has not been professionally assessed. However, the site form recorded by Cassidy and Seymour in 1974 and the sketch map drawn by Beth Hill (in 1971?) suggest to me that the site may be quite "significant" in terms of the criteria outlined in the AIA Guidelines. The site forms indicate that the site is unusually large, that historic as well as prehistoric activities were conducted there, and that the site may be part of a larger functional complex that includes trails, springs, inland shell-bearing deposits, and possible burial features. All of these observations indicate that DfRu-002 may be scientifically significant. I note that the Penelakut currently living on Kuper Island conduct contemporary subsistence activities at Walker's Hook and also have ancestors buried on the site. This indicates that the site qualifies as ethnically significant. I see from the documentation I have been provided that there is or has been some interest in having the site preserved for public use, suggesting that it may have public, and perhaps even economic, significance.

Given all of these indicators of the significance of DfRu2 according to the criteria outlined in the Ministry AIA document, the lack of assessment that has been undertaken in this case is cause for great concern. I believe that the Archaeological Impact Assessment is supposed to serve as a land use planning tool. Once the resource has been properly, thoroughly, and systematically assessed, then that information can be used to help plan the proposed development and suggest whether avoidance, re-design of the development, systematic data recovery, or some other mitigation strategy is appropriate. By contrast, the recent strategy under Permit 2003-123 seems to be data recovery using a

single one one-by-one meter unit and monitoring *during* construction *prior* to generating information about the nature and extent of this site. I wonder how it is possible to determine the impact of the proposed destruction of additional portions of the archaeological deposits in the absence of an AIA.

For example, do we know anything about the horizontal extent of the subsurface deposits? Are they isomorphic with the visually observed surface deposits in terms of spatial extent, or has the intensity of use (and perhaps function) changed over time? In terms of specific impacts, has the impact of the marine aquifer level fluctuation on possibly deeply buried deposits been assessed? Do we know about the rate of decomposition of the archaeological bone prior to Sablefin Hatcheries Ltd's construction so that we can assess whether it has accelerated since the initial development activities and during the ongoing hatchery operation? Do we know, for example, what effect the fluctuating tides alone had on the basal deposits of the midden prior to hatchery operation? Do we even know for sure where those basal deposits are? As I'm sure you are aware, many sites on the Northwest Coast are underlain by a dark layer that may not appear to be shell bearing but is nevertheless high in calcium carbonate and contains cultural materials. Also quite common in this region is the occurrence of a sterile stratum that is underlain by additional, possibly water-saturated cultural deposits. Has either of these possibilities been investigated? I.R. Wilson Consultants Ltd. noted in the *Description* portion (dated March 17, 2003) of Gidon Minkoff's Application for a Heritage Site Alteration Permit that the area of the salt marsh sensitive ecosystem at Walker's Hook may contain "wet deposits," and that this is based on "exposures in marshy areas bordering the raised midden." Does the fluctuation of the marine aquifer on the tombolo have any effect on these deposits, if they do indeed exist? If four more well-heads are added, what effect might that have on such deposits? In general, archaeologists both regionally and globally are becoming more aware of the fact that water-saturated deposits may not be restricted to special environments such as salt marshes. Has the possibility of such deposits and preserved organic material underneath the shell-bearing strata of the tombolo been investigated? These are just a few of the questions I have that I believe are unanswerable in the absence of a proper Archaeological Impact Assessment.

Based on the unique nature of the DfRu002 site location, it seems highly probable that the cultural deposits here contain evidence of unique prehistoric activities. The oral history of the Penelakut indicates that this location, Syuhe'mun, was a winter village site. I.R. Wilson Consultants Ltd. (letter of January 9, 2004 to Sablefin Hatcheries Ltd.) has stated that the company's preliminary analysis indicates it is a special-purpose seasonally occupied site. Thus, the cultural deposits at Walker's Hook may contain evidence of the emergence of the ethnohistoric seasonal round pattern. This added to the fact that the site appears to be scientifically, culturally, historically, and publicly significant according to the criteria outlined in the AIA Guidelines, prompted me to write this letter.

Due to the potential multi-faceted significance of site DfRu-002 at Walker's Hook, I urge you to deny Sablefin Hatcheries Ltd.'s application for an amendment to Site Alteration Permit 2003-123. Additional destruction to this valuable cultural place and non-renewable archaeological record should not be allowed at this time. Undertaking a

proper Archaeological Impact Assessment, while now unable to be used to mitigate the impacts of the original construction, would at least provide the baseline data to allow a secure assessment of the potential impact of further work. These data could then be used in designing a strategy to minimize the impact to the archaeological record and/or minimize the information lost through the further destruction of this site. I understand this to be the stated purpose of the Assessment process.

Thank you for your consideration of my comments.

Sincerely,

Kimberly D. Kornbacher, M.A.  
Salt Spring Island Resident