

ARCHAEOLOGICAL IMPACT
ASSESSMENT OF LOT 20, D.L. 87
COMOX, B.C.

Conducted under:

PERMIT 1993-38
Issued by the Archaeology Branch

Prepared for:

NOORT HOMES & ASSOCIATED COMPANIES
7857 Sixth Street
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Prepared by:

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May 1993



14 May 1993

NOORT HOMES & ASSOCIATED COMPANIES
7857 Sixth Street
Burnaby, B.C.
V3N 3N4

Att'n: Mr. Hugh Noort

Dear Sir:

Re: Subdivision of Lot 20, D.L. 87, Comox District
Archaeological Impact Assessment

This letter report presents the results of the archaeological impact assessment which you requested from our firm for the proposed development of the captioned property.

Introduction

The subject property (Lot 20, D.L. 87, Comox District, Plan 2657, except part in Plan 3179; Lot 1, D.L. 87, Comox District, Plan 3387; and Lot A, D.L. 87, Comox District, Plan 16091) is located on the north shore of Comox Harbour at the eastern boundary of the Municipality of Comox, B.C. (Figure 1). The property is southwest of the corner of Balmoral Avenue and Croteau Road. It is presently owned by Noort Homes & Associated Companies, who intend to construct a mix of single- and multi-family housing on the property. As part of the development requirements, the Planner for the Municipality of Comox informed the proponent that the project might conflict with a previously-recorded archaeological site (assigned number DkSf 4) and that there was a further possibility of conflict with unknown archaeological sites on the property. In order to proceed with the project, the developer engaged Arcas Consulting Archeologists Ltd. (Arcas Ltd.) to carry out an archaeological impact assessment of the subject property.

As presently envisioned (Figure 2), the Noort Homes intends to develop 17 single-family lots with cul-de-sac access off Croteau Road and 36-unit and 44-unit townhouse complexes with road access off Balmoral Avenue and Croteau Road. The single-family lots are

to occupy the southern third of the subject property, while the townhouses are located to the north. On the west side of the property, a low-lying area beside Brooklyn Creek, the adjoining east side of the gulley, and a 15 m-wide strip for fisheries protection (restrictive covenant) at the top of the stream gulley, are to be set aside as parkland, as this location is adjacent to the Hamilton Mack Laing Nature Park. The southwestern corner of the property will be retained by Newson Fisheries Ltd., and is shown as "Lot 18" on Figure 2.

Archaeological sites are locations with remains produced by human activities in the past. Typical sites in the Comox Harbour - Baynes Sound area include shell middens, trench embankments, rock art, and burials. Shell middens are deposits of mollusc shell, fire-altered rocks, charcoal, and animal bones representing the locations of village sites or resource processing camps. Trench embankments are putative defensive features constructed to protect villages or refuges from hostilities. In British Columbia, most archaeological sites are attributable to native Indian settlement and land use. Sites of Euro-canadian activity pre-dating 1940 may also be considered as historic archaeological sites where circumstances warrant.

The work undertaken consisted of an archaeological impact assessment as defined in the *British Columbia Archaeological Impact Assessment Guidelines* (Apland and Kenny 1992) issued by the Archaeology Branch. The purpose of the impact assessment, based on these guidelines, was to (1) identify and evaluate the significance of any archaeological remains located on the subject property, (2) identify and evaluate possible impacts by the proposed development on archaeological remains, and (3) recommend appropriate impact management measures where necessary. The assessment was conducted under Permit #1993-38 issued by the Archaeology Branch in accordance with the Heritage Conservation Act.

Setting

The subject property consists of about 9 acres (ca. 3.6 ha) on the north shore of Comox Harbour about 0.7 km west of Balmoral Beach at Goose Spit. It is situated between the high water mark of the harbour and Balmoral Avenue to the north, and between Croteau Road on the east and the Hamilton Mack Laing Nature Park on the west. Private residences flank the property on the east side of Croteau Road and three houses are present between Brooklyn Creek and the northwest corner of the property. A single dwelling and associated fishing enterprise owned by Newson Fisheries Ltd. occupies the southwest corner of the subject property. A narrow dirt driveway provides access to the Newson property from Balmoral Avenue. The western extremity of the subject property can also be accessed from a road leading into the park.

The surficial geology of this locality is characterized by localized deposits of Pleistocene outwash sediments overlying compact glacial till. In forested locations the glacial sediments are covered with a veneer of very dark brown to reddish brown humic silty loam.

The southern extremity of the property is slightly hummocky wetland only slightly elevated above the high water mark, which then rises abruptly to an 8m-high terrace approximately 100 m inland from the shore line. This is considered to be an ancient raised beach. From the crest of the terrace the terrain rises gently to the north, gaining only 14 m elevation in 400 m. The western edge of the subject property drops off sharply into the deep gully of Brooklyn Creek, which extends north to and beyond Balmoral Avenue. The elevation of the property ranges from 0 m above sea level (asl) at the high water mark to 22 m asl at the corner of Balmoral Avenue and Croteau Road.

The Comox Harbour locality is situated within the Wetter Subzone of the Coastal Douglas-fir Zone (CDFb) as defined by the Ministry of Forests Research Branch. Wetland associations dominated by red alder and broadleaf maple are found along Brooklyn Creek and between the toe of the raised beach terrace and the high water mark. Much of the property is vegetated with mixed-wood forest dominated by grand fir, red alder, and broadleaf maple, with several mature Douglas-fir (>90 cm dbh) scattered over the northern portion of the subject property. Red cedar and western hemlock are conspicuously absent, while young Sitka spruce and English holly trees form minor but conspicuous constituents of the arboreal flora. The spacing of the trees on the property suggests historic logging, and numerous large old stumps (mostly 200+ cm dbh) demonstrate that old-growth Douglas-fir was selectively harvested. Local residents reported that the logging took place during the 1940s, and the presence of springboard notches in many of the stumps indicates that hand-logging techniques were probably employed.

The shrub layer is locally quite dense, particularly near the northern edge of the property and in the wetlands by the creek below the raised beach terrace. Dominant species include salmonberry, oregon-grape, waxberry, red-osier dogwood, elderberry, and red huckleberry; wild roses and blackberries are present but uncommon, and Scotch broom is abundant at the disturbed forest edge along Croteau Road. The herb layer is quite dense, especially in the younger seral forest covering the southern portion of the subject property, and include some species of traditional economical significance to aboriginal inhabitants like wild lily-of-the-valley and miner's lettuce. A few garden escapes are scattered around the margins of the property, notably along Croteau Road.

Previous Archaeology

No systematic archaeological site inventory has yet been carried out in the Comox Harbour - Baynes Sound area, though many prehistoric archaeological sites have been recorded in this vicinity during unsystematic site inventories and impact assessments. There have been several archaeological excavations in the area, and of special importance for understanding the prehistory of the Comox Harbour locality are site investigations at: (1) the Condensory Bridge Site (DkSg 2), Millard Creek Site (DkSf 2), Comox Bay Site (DkSf 4), and "Boulder Bowl" Site

(DkSf 29) by Katherine Capes; (2) the Mountie or J. Puddleduck Site (DkSf 26) by Steven Lawhead and Donald Mitchell; (3) the Comox Fort Site (DkSf 6) by John McMurdo; (4) the Comox Bay Site (DkSf 4) by Bjorn Simonsen, and (5) the Clamity Site (DkSf 20) by Milt Wright. As a result of the excavations carried out at these and other sites in the northern Strait of Georgia, archaeologists have identified a record of human occupation and land use for about the last 4000 years.

At the time the present assessment was undertaken, the Comox Bay Site (DkSf 4) was the only site reported on the subject property. DkSf 4 represents a consolidation of seven smaller sites recorded along the north shore line of Comox Harbour, including DkSf 3, 4, 15, 16, 17, 22, and 23. Many of these sites were recorded by John McMurdo of the Archaeological Sites Advisory Board (ASAB) in 1974, but DkSf 3 was originally recorded by Don Abbott (UBC) in 1963. Judy Von Krogh and Olivia Scott recorded the remainder of the sites in 1977. The sites were revisited by Pauline Rafferty and Diana French in 1976, Laurie Williamson and Sharon Johnson in 1978, and Lynne Melcombe and Helen Mason in 1979. All of these revisits were undertaken by ASAB personnel, and ultimately resulted in the sites being consolidated by the Archaeology Branch in 1980. The site was not again visited for a decade, when impact assessments of residential properties near the western end of the site were undertaken by Bjorn Simonsen (Bastion Group) in 1989, and Douglas Glaum (Archaeology Branch) and John Dewhirst (Archaeo-Tech Associates) in 1990.

Archaeological excavations have been undertaken at DkSf 4 by Capes and Simonsen. Katherine Capes undertook investigations on the Stubbs, Constable, and Fairley properties between Brooklyn Creek and Filberg Road in 1960, 1967, and 1977. Capes reported that the results of her excavations suggested that this part of the site appeared to be quite similar to the 3500 year-old Millard Creek Site (DkSf 2), so her single radiocarbon date of 450 ± 60 BP (Before Present) was suspected to be anomalously young. The cultural (i.e., archaeological) stratigraphy and artifacts associated with this part of the Comox Bay Site bears a strong resemblance to site DiSe 10 at the north end of Denman Island, where Morley Eldridge obtained radiocarbon dates of 3500 ± 100 BP. Bjorn Simonsen conducted three separate small-scale excavations on the western part of DkSf 4 in 1989 and 1990, obtaining a series of radiocarbon dates between 1320 ± 70 and 2160 ± 100 BP from deposits on the Finneron property. Additional discoveries from this site include several private collections of bone and stone artifacts presently curated at the Courtenay Museum, and an unknown number of human burials which are now at the Royal British Columbia Museum in Victoria.

Ethnography

Prior to Contact with European explorers, the Comox Harbour - Baynes Sound area was occupied by the *linguistically*-extinct Pentlatch (*pənχəč* in the language of the

neighbouring Comox and Sechelt tribes) who spoke one of the languages in the Northern Coast Salish linguistic family. The Pentlatch nation consisted of four subgroups, and the name "Pentlatch" may also have been the name of the Comox Harbour subgroup; other subgroups are known to have lived in the vicinity of Qualicum, in the Union Bay - Deep Bay locality, and as far south as the Englishman River near present-day Parksville. Neighbours of these Pentlatch groups were the Nanaimo who inhabited the east coast of Vancouver Island to the south and the Island Comox who formerly resided on Vancouver Island as far north as Kelsey Bay.

Beginning in the mid-18th Century, the warlike Lekwiltok tribe, speakers of the Kwákwá'la (Kwagiulth) language, invaded traditional Island Comox territory as far south as Cape Mudge. Some surviving Island Comox people began to reside permanently with the Pentlatch at Comox Harbour. Around the middle of the 19th century, Salish-speaking neighbours such as the Nanaimo and Cowichan began to fish and live in the Qualicum locality, traditional lands of the Pentlatch, who were now too diminished in numbers by wars and disease to control all of the territory they formerly held. Only one family of Pentlatch speakers remained at Comox by the end of the century, and the language became extinct in 1940. The native people who live in the Comox Harbour - Baynes Sound area today are the descendants of the Pentlatch and Island Comox people who resided there in the 19th century. The name of the main Pentlatch village -- as given to ethnographers by speakers of the Island and Mainland Comox languages -- was *q'úmu?x's*; this village was situated on the north side of Comox Harbour where the Comox Indian Reserve #1 is presently located. The mixed Pentlatch and Island Comox village of *qi?* was located at Cape Lazo northeast of the subject property.

Pentlatch population and settlement were contingent upon the availability and distribution of seasonally available food resources. These resources would have included anadromous fish runs in local streams and rivers, especially chum salmon and pink salmon which could be hard-dried and thus preserved for winter consumption. Oil-rich species such as spring, sockeye, and coho salmon were also prized but were usually eaten fresh. Herring were taken for their roe, flatfish, rockfish, and lingcod were also of particular importance. Sea mammals were taken by specially trained hunters, and included sea lions, harbour seals, and harbour porpoises. Deer was the most important land mammal hunted, and a few hunters were skilful enough to successfully pursue mountain goats. Small mammals were hunted as convenient, and abundant resident and migratory waterfowl utilizing the Comox estuary were sometimes harvested in large numbers by means of nets. The Comox Harbour - Baynes Sound area has rich intertidal resources such as clams, cockles, and mussels, which were an important part of the traditional diet, and discarded shells of these creatures are the major constituents of archaeological sites in this area today. Plant resources such as berries, shoots, roots, bulbs, rhizomes, and bark cambium were also collected as convenient, principally by women and children.

Methodology

The archaeological impact assessment consisted of a field survey for the purpose of identifying and recording archaeological remains on the surface and buried below the surface of the subject property. The Comox Indian Band was contacted by letter and telephone to solicit the opinion of the Band regarding the ethnic significance of archaeological remains in the Comox Harbour locality generally and on the subject property particularly. The field survey was carried out by Richard Brolly, impact assessment archaeologist with Arcas Ltd., on 28 - 30 April 1993.

Survey procedures consisted of a visual inspection of the surface and of subsurface exposures for midden deposits, fire-altered rocks, animal bone, charcoal, and artifacts (in decreasing order of visibility). The property was also inspected for culturally-modified trees and for evidence of archaeological features such as the defensive trench embankment reported from DkSf 6 near the Comox Hospital.

An Oakfield Soil Sampler was used to test for buried cultural deposits and to establish site boundaries where such deposits were present. Information with regards to site integrity, depth of cultural deposits, and the archaeological content of those deposits was readily obtained from surface exposures and cut banks around the property, especially along the Newson driveway and the bank of Brooklyn Creek. In addition, the roots of tree throws and some historical pits provided similar information about the subsurface matrix across the property.

Because soil probing was unambiguous in demonstrating where cultural deposits were present, shovel testing was rarely necessary to determine the configuration and integrity of cultural deposits. Shovel testing was used on parts of the site where subsurface stoniness prevented effective probing. Shovel tests consisted of 30 x 30 cm pits excavated until non-cultural sediments or incontrovertibly intact archaeological deposits were encountered. The matrix from the tests was manually sorted. Finally, a shovel facing was employed to obtain a clear profile of a deep midden exposure on the Newson driveway.

Results

The entire subject property was examined during the field survey. That portion of the Comox Bay Site (DkSf 4) on the property was relocated, mapped, and evaluated. As reported by previous archaeologists, the site was primarily situated along the edge of the raised beach terrace, although a small area of midden was seen below the terrace on the west side of Croteau Road (Figure 3). No culturally-modified trees or additional archaeological remains were identified.

Shell was exposed on the surface across much of the site, indicating the presence of recent disturbance or that little humus development has occurred since the midden was abandoned. A number of recent pits were scattered about the site, particularly to the east, and a 2 m-wide trench has disturbed the northern edge of the site west of Croteau Road. Lastly, the collapsed ruins of a small frame dwelling or shed are present near the north edge of the site just east of the Newson driveway.

The archaeological deposits extend across the full width of the property, attaining a maximum width of about 40 m at Croteau Road and where cut by the Newson driveway. Owing to recent disturbance by timber harvesting, the width of the site between the road and driveway is less certain, though approximately the same as observed on the margins. Site width appears to expand to about 60 m near the western edge of the subject property. The site has been cut by Croteau Road, but additional cultural deposits were observed in the yards of houses to the east along Midden Road. Furthermore, a considerable area of intact midden is also present in the park west of the subject property. Cultural deposits were observed on the upper slope of the terrace scarp, but it is unclear whether these materials are in their primary context or have been redeposited on the slope by erosion. Finally, a small area of midden was observed at the edge of the alder swamp, immediately west of the south end of Croteau Road. Apparently intact shell midden conformable to this latter deposit was seen on the residential property on the east side of the road. The deposits on the lower part of the property have been somewhat disturbed by construction of municipal sewer lines, but at least some of this part of the midden is believed to be intact.

A few cut bank exposures were observed west of the property in Brooklyn Creek and near a privy on the Hamilton Mack Laing Nature Park, and an excellent exposure of midden was observed in the Newson driveway where it cut across the crest of the terrace. A 190 cm-high, 50 to 75 cm-wide shovel facing was made on the west side of the midden cut. The uppermost part of the cleaned profile was characterized by a series of narrow layers: (1) pure broken and whole clam shell (some burned), (2) shell with black loam, (3) black gravelly loam, and (4) pure crushed shell. Underlying this was an approximately 30 cm-thick layer of (5) black loam with sparse shell and fire-altered rocks, over narrow layers of (6) greyish brown ash and (7) shell, black loam, and abundant fire-altered rock. Underlying the latter was an approximately 60 cm-thick layer of (8) black gravelly loam with sparse shell, overlying non-archaeological (9) compact brown silty loam with gravel. An exposure in the bank of Brooklyn Creek just west of the property boundary showed that olive brown medium sand also underlies the cultural deposits in some locations.

Soil probing to establish the site boundaries on the subject property determined that black anthropogenic (i.e., created by human activity and not natural processes) loam with sparse shell was the predominant cultural matrix present, although shelly layers were more frequently encountered towards the west. Where not impeded by subsurface stoniness, probing determined that cultural deposits were over 90 cm in depth, and that the depth of the cultural

deposits decreases from west to east. Furthermore, the frequency of shell also appears to decrease in this direction.

No evaluative tests were necessary during the assessment because the configuration of subsurface deposits could be determined from soil probing and a few shovel tests. The shovel tests were excavated to check for the presence of faunal remains and artifacts, and to provide stratigraphic information not obtainable from soil probing. One shallow test was excavated near the eastern edge of the property to verify that subsurface stoniness was caused by the presence of abundant fire-altered rock. A second test was excavated in the bottom of a modern pit in the approximate centre of the site in an attempt to reach the bottom of the cultural deposits. The pit was over 100 cm deep, and the shovel test was excavated through 20 cm of black stony loam into non-archaeological wet brown to reddish brown gravelly coarse sand. The side of the pit was then faced to expose a profile of undifferentiated black anthropogenic loam with rare shell fragments. A third shovel test was excavated near the edge of the terrace in a location where probing revealed the presence of dense shell; this test was 35 cm deep, and had 13 cm of black humic loam overlying loosely-consolidated shell dominated by coarsely-fragmented butterclam and littleneck clam, with crushed shell, grey sand, black loam, and abundant fire-altered rock.

This part of DkSf 4 represents the central portion of a very large shell midden, known as the Comox Bay Site, formerly recorded as seven separate sites but consolidated into a single site in 1980. The portion of the site on the subject property was originally recorded as "DkSf 3" in 1963 and was revisited and partially re-recorded in 1976 and 1979. As presently understood, the Comox Bay Site extends from the Comox Marina at the foot of Port Augusta Street to Balmoral Beach at Goose Spit -- a distance of about 2000 m. Much of the site east and west of the subject property has been severely disturbed or destroyed by residential development, and the portion on the property appears to be one of the largest intact sections of the midden remaining.

The results of the field survey indicate that:

- (1) Intact cultural deposits referable to DkSf 4 extend across the full width of the subject property, covering an area estimated to be about 3500 m²;
 - (2) The deposits range in depth from about 120 to over 200 cm in depth;
 - (3) Black anthropogenic loam with abundant fire-altered rock is the most widespread cultural stratum, but dense shell layers are more prevalent to the west;
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- (4) No artifacts were observed and only one bone fragment was identified; and
- (5) No human remains were found on this site in 1993, but human burials have been reported from this site previously and there is a strong probability that additional human interments will be encountered at this location.

Less than 50% of DkSf 4 is believed to remain intact overall, the rest having been destroyed or severely disturbed by residential development, particularly west of Filberg Road and between Croteau Road and Hawkins Road east of the subject property. The portion of the site on the subject property is probably between 80 and 90% intact, and together with midden deposits on the adjacent Hamilton Mack Laing Nature Park, forms one of the largest, contiguous, intact remnants of the site.

Significance Assessment

The significance of DkSf 4 was evaluated using criteria listed in the *British Columbia Archaeological Impact Assessment Guidelines* (Apland and Kenny 1992). The *Guidelines* specify several kinds of significance: scientific, ethnic, historic, public, and economic. Scientific significance is based upon the potential of an archaeological site to provide evidence which would substantively enhance our understanding of culture history, culture process, and other aspects of local and regional prehistory. Ethnic significance refers to the traditional, social or religious importance of a site to a particular group or community. As far as possible, ethnic significance should be evaluated and expressed in terms of the value system of the ethnic community involved. Of particular importance, the *context* of a site or complex of sites must be addressed when evaluating ethnic significance. Historic significance refers to a site's association with an important historic event or person. Public significance pertains to an archaeological site's potential for public use in an interpretive, educational or recreational capacity. Economic significance refers to the financial benefits that may be placed on the public's use of an archaeological site. Owing to the special characteristics of assessing economic significance, it is rarely applied in archaeological impact assessments.

The site remnant on the subject property has been slightly disturbed by historic timber harvesting and by construction of the Newson driveway and Croteau Road. The cultural deposits are quite deep and predominantly intact, may be of considerable antiquity, and may contain human burials. For these reasons, DkSf 4 on the subject property is considered to have high scientific significance. The midden deposits decrease in depth from west to east, and it is suspected that the deposits on the west half of the property are more significant than those nearer to Croteau Road; a the small midden remnant at the south end of Croteau Road is considered

to be of low significance. A statement released by the Comox Indian Band declares that the Comox Bay Site is considered to be of high ethnic significance. Historic significance is nil, and public significance is regarded to be low-to-moderate owing to the limited interpretive potential of a featureless midden, which is, however, intact and adjacent to a municipal park. The economic significance of the site is unknown. Overall significance of DkSf 4 on the subject property is rated as high.

Impact Assessment

The design plans available for the proposed development indicate that DkSf 4 on the subject property conflicts with several of the single-family lots designed for the southern third of the property (Figure 4). As shown on the figure, most of Lots 8, 9, 10, 11, about half of Lots 7 and 12, small portions of Lots 5 and 6, and the northern cul-de-sac conflict with the site. The small midden remnant adjacent to the south end of Croteau Road conflicts with Lot 1 and the southern cul-de-sac. The proposed multi-family residences and single-family Lots 13, 14, 15, 16, and 17 on the northern part of the property do not conflict with any archaeological remains. Single-family Lots 2, 3, and 4 will be situated in what is presently wetland, and do not conflict with DkSf 4.

As currently designed, residential development of Lots 8, 9, 10, 11, and 12 will cause major impacts to the integrity of the midden deposits, predominantly as a result of ground preparation (i.e., clearing and grubbing), basement excavations, and installation of underground service lines. Because all or most of these lots are covered by the midden, this is considered to be an unavoidable impact. Similar impacts to the site on Lots 5, 6, and 7 should be minimal because a much small area of each lot contains midden deposits.

Recommendations and Conclusions

The impact assessment concluded that the development of six proposed single-family lots on the subject property will impact DkSf 4, an archaeological site regarded as being of high significance. Based on the results of the assessment, the following impact management recommendations are made:

- (1) Impacts to DkSf 4 should be avoided by project redesign; if the northern cul-de-sac were to be shifted slightly to the north and single-family Lots 8 -12 were eliminated from the project design, there would be negligible impact to the most significant portion of the site; the area of the site could then be protected by parkland dedication or restrictive covenant.
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- (2) If project redesign is not a viable option for the developer, then systematic data recovery (archaeological salvage excavation) is recommended to recover a sample of the cultural materials present.
- (3) If project redesign is not feasible, monitoring of ground preparation, basement excavations, and subsurface utility line installations on Lots 5 through 12 is recommended to ensure that appropriate impact mitigation actions are carried out if unanticipated significant archaeological remains, such as burials, are encountered.
- (4) No further impact management measures should be required for the portion of DkSf 4 in the proposed parkland dedication and the existing fisheries restrictive covenant zone, unless additional terrain-altering activities are planned for this location.
- (5) No further impact management measures are necessary for the low-significance midden deposit on single-family Lot 1.
- (6) No further archaeological investigations are necessary for that portion of the subject property north of DkSf 4.

This report completes our archaeological impact assessment for the proposed development. As required by the Permit, I will send two bound copies of this letter report to Dr. Steven Acheson of the Archaeology Branch. In addition, the Comox Indian Band has requested a copy of this report for their files.

Thank you for the opportunity to conduct the impact assessment. If you have any questions about this report, please do not hesitate to contact me.

Sincerely,

ARCAS CONSULTING ARCHEOLOGISTS LTD.

Per:

R. P. Brolly

Richard P. Brolly
Impact Assessment Archaeologist

/rpb

pc: Steven Acheson, *D.Phil.* (Archaeology Branch)
Elizabeth McLeod, Band Manager (Comox Indian Band)

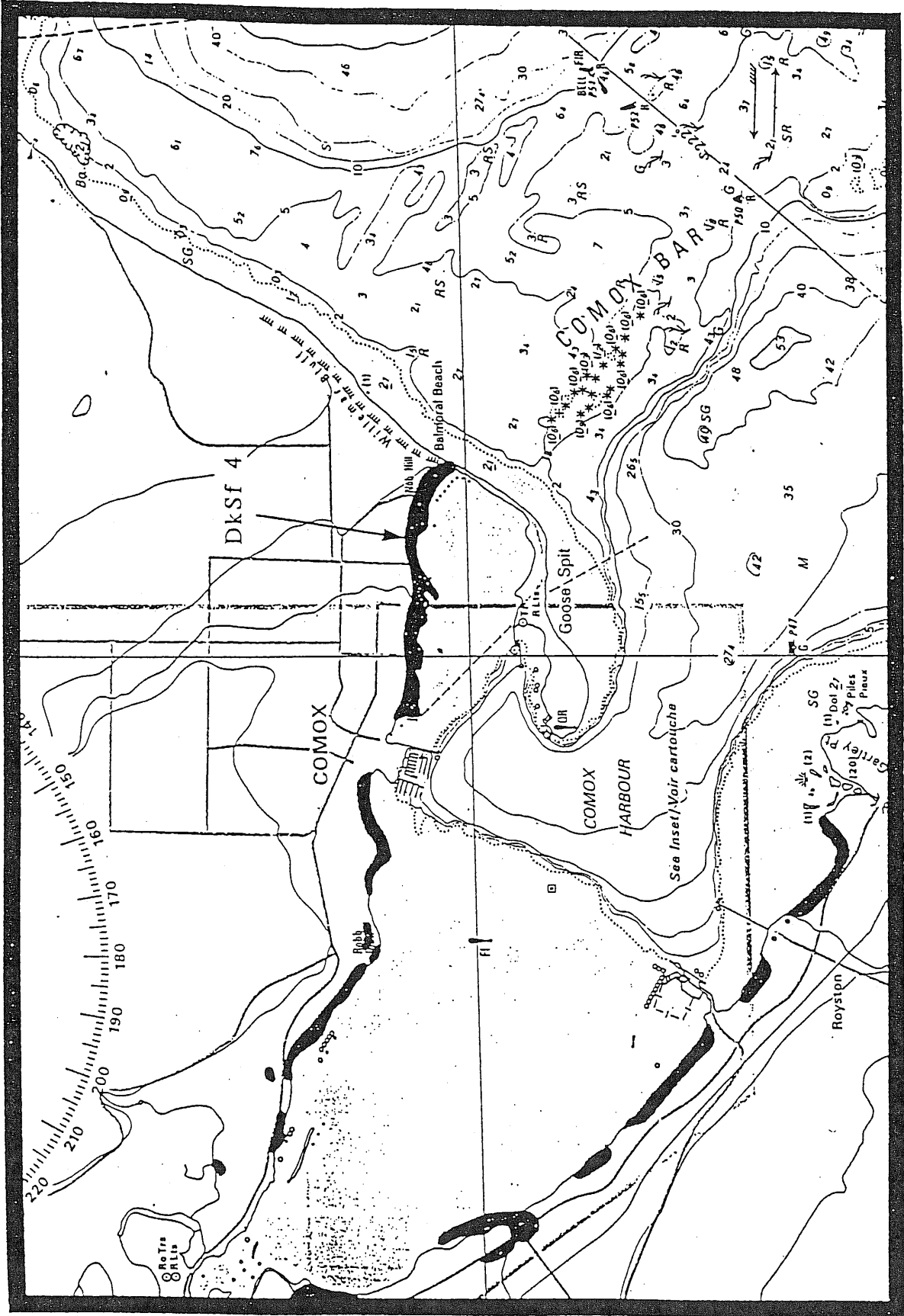


Figure 1. Location of subject property in Comox Harbour showing archaeological site Dksf 4 location (1:40,000).

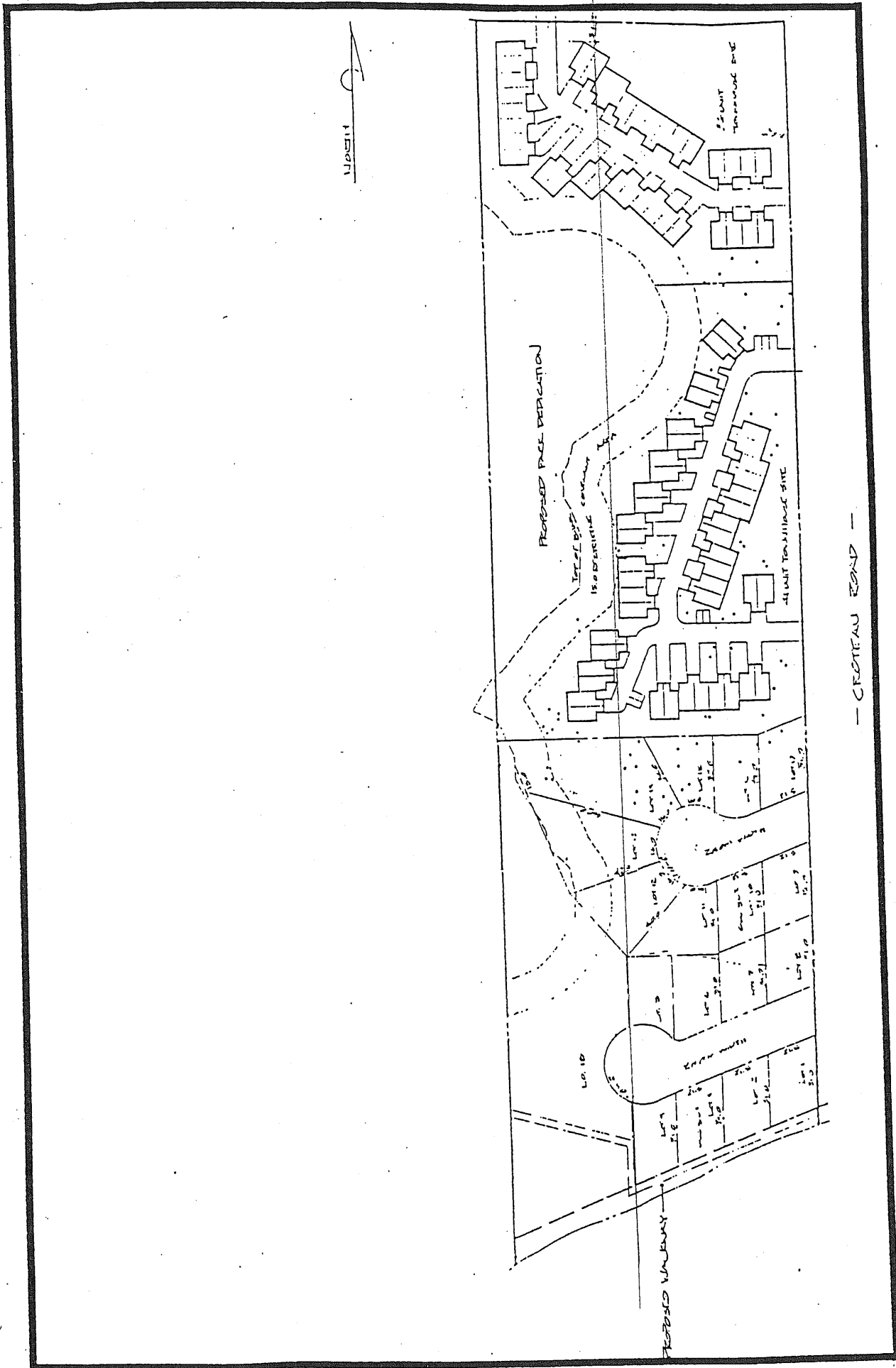


Figure 2. Plan of the subject property showing proposed development (1:2000).

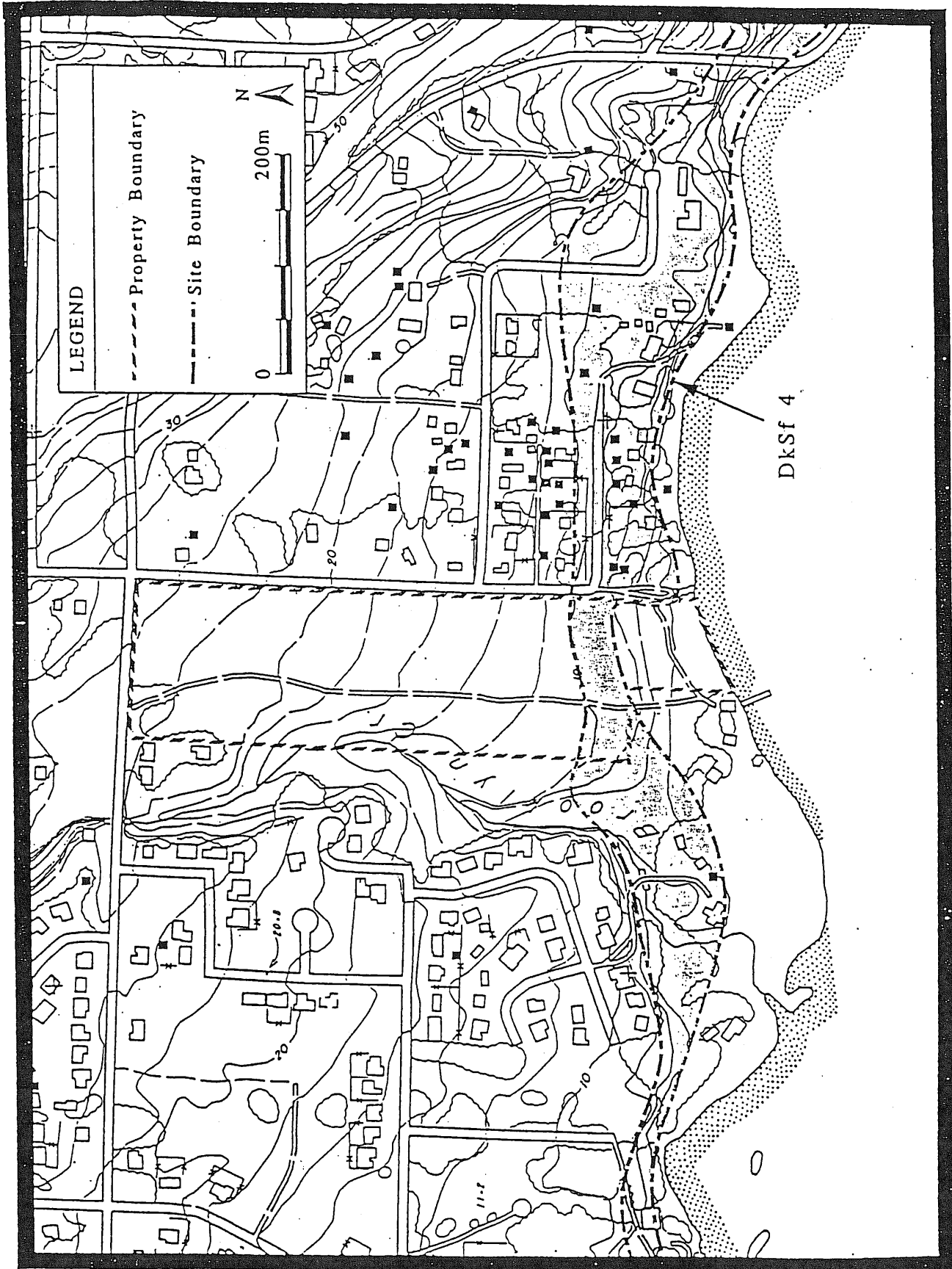


Figure 3. Map of the Brooklyn Creek locality showing location of subject property and DkSf 4 (1:5000).

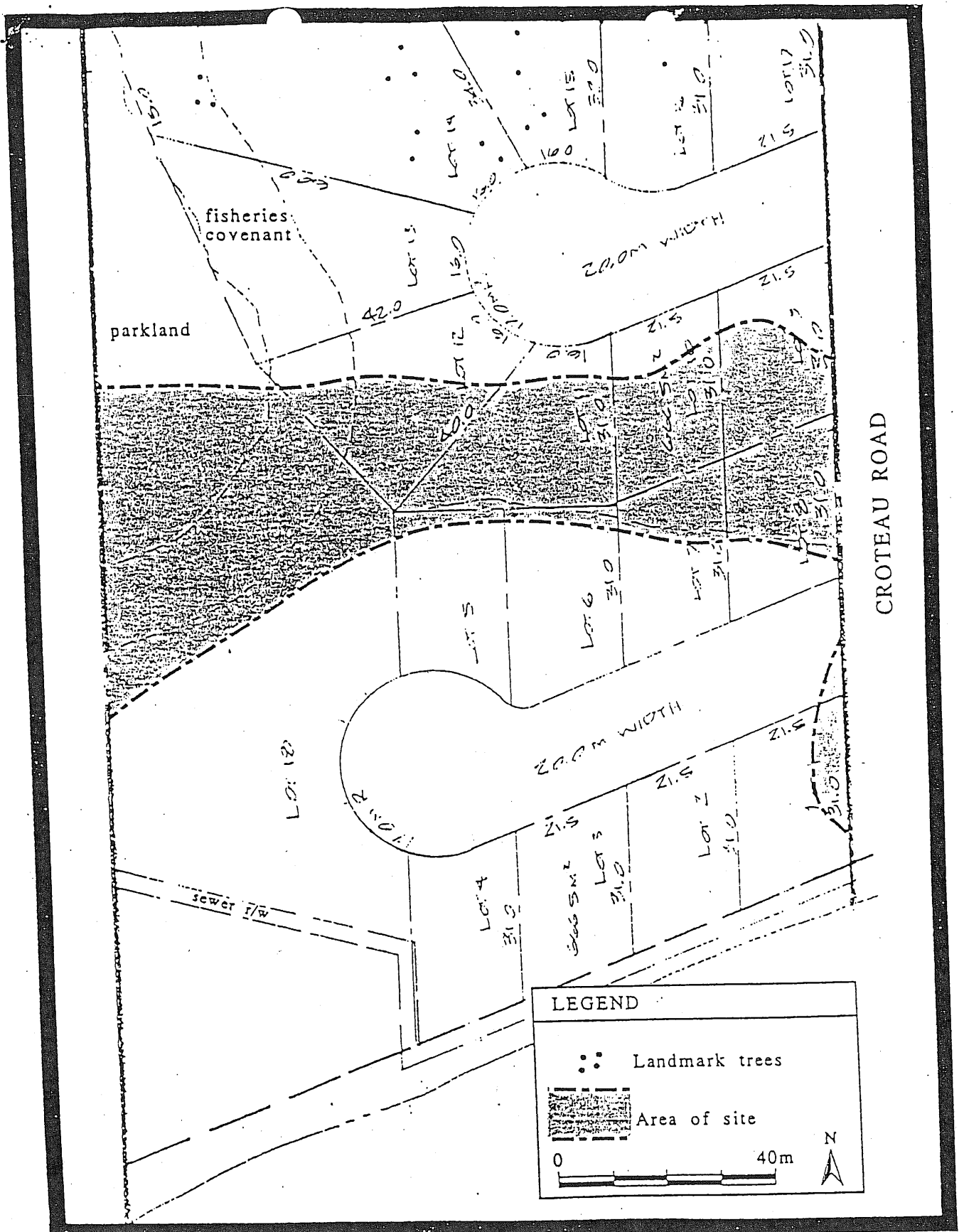


Figure 4. Development plan showing location of DkSf 4 (1:1000).