

**Ministry of Heritage, Sport, Tourism, and
Culture Industries**

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**Ministère des Industries du patrimoine, du sport, du
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Dec 10, 2020

Paul Racher (P007)

Archaeological Research Associates Ltd.
219 - 900 Guelph Kitchener ON N2H 5Z6

**RE: Review and Entry into the Ontario Public Register of Archaeological Reports:
Archaeological Assessment Report Entitled, "Stage 1 Archaeological Assessment,
Cambridge Mill Hotel Condo, 130 Water Street North, City of Cambridge, Regional
Municipality of Waterloo, Part of Lot 1 East of the Grand River, Concession 11,
Geographic Township of North Dumfries, Former Waterloo County, Ontario", Dated
Oct 5, 2020, Filed with MHSTCI Toronto Office on Oct 13, 2020, MHSTCI Project
Information Form Number P007-1111-2020, MHSTCI File Number 0012779**

Dear Mr. Racher:

This office has reviewed the above-mentioned report, which has been submitted to this ministry as a condition of licensing in accordance with Part VI of the *Ontario Heritage Act*, R.S.O. 1990, c 0.18.¹ This review has been carried out in order to determine whether the licensed professional consultant archaeologist has met the terms and conditions of their licence, that the licensee assessed the property and documented archaeological resources using a process that accords with the 2011 *Standards and Guidelines for Consultant Archaeologists* set by the ministry, and that the archaeological fieldwork and report recommendations are consistent with the conservation, protection and preservation of the cultural heritage of Ontario.

The report documents the assessment of the study area as depicted in Maps 1, 15, and 16 of the above titled report and recommends the following:

It is recommended that the identified areas of archaeological potential be subject to Stage 2 archaeological monitoring in accordance with Section 2.1.7 Standard 4 of the 2011 S&Gs. Deeply buried survey using mechanical trenching is not warranted due to the extent of the previous deep land alterations. The borehole results show substantial disturbed layers, and mechanical trenching would be an ineffective method of identifying any remains at the depths involved. Furthermore, the chances of any substantial archaeological remains are minimal due to the evidence of disturbance shown in the borehole and GPR results, the repeated uses and scouring floods in the area, and the impacts associated with the installation of various sewers. Potential soil contamination and toxicity resulting from the Galt Gas Co. were also important factors in the decision to recommend archaeological monitoring.

Prior to the commencement of construction and archaeological monitoring, detailed documentary research must be carried out for the property as set out in Section 3.1 of the 2011 S&Gs. This information will assist

in determining the CHVI of any deeply buried archaeological resources. The proposed approach (including a contingency plan if archaeological resources are encountered during monitoring) is as follows:

1. As this investigation would be done in conjunction with construction activities, a work schedule prioritizing clearance of the areas of archaeological potential should be followed. This will allow time to address any archaeological concerns with minimal impact to construction timelines or activities.
2. Archaeological monitoring will only be required within the identified areas of archaeological potential. This will allow confirmation of the structures' presence/absence. As with any historic occupation, there is potential for outbuildings or other exterior occupation features (e.g., privies). The identified areas of potential include a buffer around the structures; accordingly, monitoring will allow for the observation of any such remains.
 - a. A licensed archaeologist must be present during fill removal within the areas of potential. Fill removal will extend beyond the area of potential to allow for stable slopes/work spaces so the archaeologist can examine the soils more closely.
3. It is anticipated that the maximum depth of project impacts will be 1.3 m below grade to avoid any dewatering activities. Based on the previous borehole information and environmental testing results, the following approaches are recommended:
 - a. Archaeological monitoring be carried out throughout the fill removal process within the areas of potential to the maximum depth of the excavation required for the project.
 - b. The licensed archaeologist will work with the construction company and soil engineers to develop a shoring strategy to allow them to safely investigate any remains of CHVI (if encountered).
 - c. An excavator with a smooth edge bucket will be used if the licensed archaeologist deems it warranted based on the nature of the subsurface environment.
 - d. De-watering will be conducted if remains of CHVI are encountered below the water table in areas to be impacted by the project so that they can be appropriately investigated.
4. If intact cultural layers, structural remains or features are identified, fill removal must stop and the licensed archaeologist must evaluate the finds.
 - a. If a cultural layer is identified and the licensed archaeologist determines that it has potential CHVI, a combination of test pitting or test unit excavation must be used to determine whether archaeological materials warranting further investigation are present. The findings should be evaluated against the criteria set out in Section 2.2 and Section 3.4 of the 2011 S&Gs, the additional guidance provided in Section 6.0 of the 2014 RHF and the specific land use history to determine CHVI. Given the land use history, it is suggested that a key determining factor of CHVI will be high integrity strata dating prior to 1830.
 - b. If structural remains or features are identified and the licensed archaeologist determines that they have potential CHVI, a combination of in-field documentation and feature excavation will be used to investigate the remains. The findings should also be evaluated against the criteria set out in Section 2.2 and Section 3.4 of the 2011 S&Gs, the additional guidance provided in Section 6.0 of the 2014 RHF and the specific land use history to determine CHVI. Given the land use history, it is suggested that a key determining factor of CHVI for structural remains or features will be high integrity features dating prior to 1870.
 - c. If archaeological resources are encountered, no construction-related activities can be allowed to continue in the vicinity of the finds for at least 20 m. Use of an excavator with a smooth bucket will likely be needed to assist in determining the extent of possible or confirmed areas of CHVI and must only be used while being instructed by a licensed archaeologist. If a deposit of further CHVI is identified and mitigation is determined to be warranted, a 10 m protective buffer shall be established beyond the extent of the finds. If

the archaeological resources are determined to have no further CHVI (i.e., they do not warrant further investigation or have been fully mitigated by excavation), no protective buffer will be needed after the determination is made.

5. If areas of CHVI are encountered warranting mitigation, the investigation will proceed until the extents are fully documented and bounded by disturbance, natural soils or strata of no further CHVI.

Based on the information contained in the report, the ministry is satisfied that the fieldwork and reporting for the archaeological assessment are consistent with the ministry's 2011 *Standards and Guidelines for Consultant Archaeologists* and the terms and conditions for archaeological licences. This report has been entered into the Ontario Public Register of Archaeological Reports. Please note that the ministry makes no representation or warranty as to the completeness, accuracy or quality of reports in the register.

Should you require any further information regarding this matter, please feel free to contact me.

Sincerely,

Wai Hadlari
Archaeology Review Officer

cc. Archaeology Licensing Officer
Mackenzie Meek, Cambridge Developments Inc.
Bridget Coady, Region of Waterloo

¹*In no way will the ministry be liable for any harm, damages, costs, expenses, losses, claims or actions that may result: (a) if the Report(s) or its recommendations are discovered to be inaccurate, incomplete, misleading or fraudulent; or (b) from the issuance of this letter. Further measures may need to be taken in the event that additional artifacts or archaeological sites are identified or the Report(s) is otherwise found to be inaccurate, incomplete, misleading or fraudulent.*