



April 23, 2021

Ms. Laura Shick
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Connecticut River Bridge Replacement
Phase IB Report and Expanded Phase IB/Phase II Archaeology Memorandum Report
Old Lyme and Old Saybrook, Connecticut

Dear Ms. Shick:

The Connecticut State Historic Preservation Office (SHPO) reviewed the documents prepared by Archaeological and Historical Services, Inc. (AHS) for the referenced project. The project is an undertaking pursuant to Section 106 of the National Historic Preservation Act (Section 106) and is subject to review by this office. The submitted materials were prepared according to Stipulations III.B and III.C of the *Memorandum of Agreement among the Federal Railroad Administration, the National Railroad Passenger Corporation (Amtrak), and the Connecticut State Historic Preservation Officer, Regarding the Connecticut River Bridge Replacement Project in New London and Middlesex Counties* (MOA) executed in August 2016. Stipulation III pertains only to archaeological resources and is consistent with the basic steps of the Section 106 process by assessing the potential of the undertaking to impact significant archaeological resources (Stipulation III.A), identifying resources that may be present (Stipulation III.B), evaluating identified resources according to the criteria for evaluation (Stipulation III.C), and resolving adverse effects to historic properties (Stipulation III.C).

In fulfillment of Stipulation III.A, a Phase IA Archaeological Assessment Survey was completed that included research, field survey, and limited soil borings. SHPO previously commented on this report in a letter dated August 8, 2019. At that time, SHPO concurred with the findings of the report that additional archeological investigations of the project area should be completed. Our office approved an archaeological testing plan to fulfill Stipulation III.B and subsequent testing under Stipulation III.C, as needed, in a correspondence dated January 13, 2020. The currently submitted report titled, *Technical Report: Phase I Archaeological Reconnaissance Survey Results, Memorandum of Agreement Stipulations Nos. IIIA and IIIB, Connecticut River Railroad Bridge Replacement Project Old Saybrook and Old Lyme, Connecticut* details the results of these investigations. The report is comprehensive, and meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources* and the Department of the Interior's *Standards for Archaeological Documentation*, as requested in the MOA.

State Historic Preservation Office

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As described in the above referenced report, previously recorded Site 105-24 was relocated and two previously unknown archaeological sites (105-72 and 106-39) were identified. Site 105-24 is listed on the National Register of Historic Places (NRHP) as a contributing resource to the Lower Connecticut River Valley Woodland Period Archaeological Thematic National Register District. AHS conducted an appropriate level of testing to confirm that this site is located adjacent to, but outside of the Area of Potential Effect (APE). To avoid inadvertent adverse effects to this historic property, SHPO requests that Site 105-24 is marked on project maps as a sensitive resource area and that it is identified in the field to avoid any unintended impacts. SHPO concurs with the recommendation that a fence be erected under the guidance of a qualified archaeologist prior to construction activities in its vicinity.

During the Phase I archaeological survey, Sites 105-72 and 106-39 also were newly recorded. Both sites yielded temporally diagnostic artifacts and a diverse assemblage of materials from intact soil contexts. Because these sites exhibited the potential to contribute to our understanding of pre-contact lifeways, they both were recommended for additional Phase II archaeological testing to better understand the nature and distribution of artifacts, as well as evaluate their potential for listing on the NRHP.

In fulfillment of Stipulation III.B and Stipulation III.C, a Phase I archaeological survey of newly identified project areas and Phase II intensive testing of potentially eligible archaeological sites was conducted. The results are summarized in the submitted memorandum titled, *Memorandum Report: Expanded Phase IB Archaeological Reconnaissance and Phase II Intensive Survey Results, Memorandum of Agreement Stipulations No. IIIC, Connecticut River Railroad Bridge Replacement Project Old Saybrook and Old Lyme, Connecticut*. Based on the information submitted to our office, the fieldwork described in the interim report meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources* and the Department of the Interior's *Standards for Archaeological Documentation*, as requested in the MOA.

During archaeological testing of an expanded APE, AHS identified newly recorded archaeological Site 105-73. A light scatter of post-contact materials was reported across the site but are not considered significant archaeological deposits. The pre-contact deposits, however, were clustered within three loci (A, B, and C) and originated from previously undisturbed contexts. The recovered artifacts were both temporally and functionally diagnostic and represented a variety of activities. It was determined that Site 105-73 also had the potential to yield significant information and that additional Phase II testing was warranted to better understand the extent and attributes of these archaeological deposits.

Phase II National Register eligibility and evaluation testing was completed at Sites 105-72, 105-73, and 106-39. A total of 183 shovel test pits and six 1x1 meter units were excavated within the

boundaries of Site 105-72. All units and 85 percent of the shovel test pits contained pre-contact artifacts. In addition, during unit excavation, three cultural features were recorded and removed; additional features were encountered during testing, but not removed as part of this effort. As a result of this investigation, 3,423 stone artifacts; 278 pre-contact ceramic sherds; and 3,033 botanical/faunal ecofacts were recovered. An analysis of lithic material suggests that this location was important to trade routes in the area with materials originating from long distances. Definitive evidence of occupations during the Middle Archaic, Late Archaic, Early Woodland, Middle Woodland, and Late Woodland demonstrates that Site 105-72 offers researchers the opportunity to understand cultural changes in one location over several thousand years of human history. Sites with this temporal depth of information are rare in Connecticut. The current effort suggests that this temporal range potentially could be extended to even earlier periods.

Phase II intensive survey of Site 105-73 included the excavation of 29 shovel test pits and a single 1x1-meter excavation unit. A total of 417 lithic artifacts, nine pre-contact ceramic sherds, and six faunal remains were recovered during this investigation. Although cultural features were not identified, the recovery of thermally altered lithic material suggests they are present. A preliminary analysis of recovered materials suggest occupation during at least the Late Archaic and Middle Woodland. This site, located in proximity to listed Site 105-24, exhibits character defining features described in the Lower Connecticut River Valley Woodland Period Archaeological Thematic National Register District nomination form.

During the Phase II intensive survey of Site 106-39, 46 shovel test pits and two 1x1-meter excavation units were excavated throughout the site extent. A total of 1,324 lithic, 32 pre-contact ceramic sherds, and 14 ecofacts were recovered as a result of this effort. A considerable number of artifacts associated with the Late Archaic were identified, including five Lamoka points, four Squibnocket Stemmed points, and two untyped Narrow Stemmed projectile points. Other notable artifacts associated with the Terminal Archaic and Early Woodland, including Vinette I type ceramics, were reported. Early Woodland sites are considered rare in Connecticut. Various explanations for this scarcity have included depopulation or the inability of archaeologists to distinguish the material cultural associated with this time period from other time periods. Site 106-39 offers a unique opportunity to study a well-defined Early Woodland occupation relative to more ubiquitous Archaic sites.

It is the opinion of this office that Sites 105-72, 105-73, and 106-39, have the potential to yield significant and important information about the settlement pattern and culture of people utilizing the lower Connecticut River drainage through an extended period of time. SHPO concurs with AHS that these sites are eligible for listing on the National Register of Historic Places (NRHP) applying the criteria for evaluation (36 CFR 60.4 [a-d]). Typically, the Section 106 process would seek to avoid or minimize effects to irreplaceable archaeological sites before considering mitigation. However, SHPO understands that the proposed project is highly constrained by multiple variables and that the Federal Railroad Administration is unable to avoid impacts to



these important cultural resources; therefore, the proposed undertaking will have an adverse effect to historic properties. Each of these sites is individually significant, but taken together, they offer a rare glimpse into nearly 10,000 years of human culture at the mouth of a regionally important river. They are one of the state's most valuable archeological assets. Their loss is significant because comparable sites already have been lost to development or climate change. Therefore, SHPO looks forward to reviewing an adequately scoped data recovery plan pursuant to Stipulation III.D.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's archeological resources. We look forward to additional consultation. For additional information, please contact Catherine Labadia, Environmental Reviewer, at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Kinney". The signature is fluid and cursive.

Jonathan Kinney
Deputy State Historic Preservation Officer

cc: Davies, Amtrak (via email)
Leslie, AHS
Murray, FRA