

September 21, 2021

Ms. Lydia Kachadoorian  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
(sent only via email to [Lydia.Kachadoorian@dot.gov](mailto:Lydia.Kachadoorian@dot.gov))

Subject: Connecticut River Bridge Replacement  
Archaeological Data Recovery Plan: Sites 105-72, 105-73, and 106-39  
Old Lyme and Old Saybrook, Connecticut

Dear Ms. Kachadoorian:

The Connecticut State Historic Preservation Office (SHPO) reviewed *Scope of Services; Phase III Archaeological Data Recovery Plan: Sites 105-72, 105-73, and 106-39* (Data Recovery Plan), revised on August 2, 2021. The Data Recovery Plan was prepared by Archaeological and Historical Services, Inc. (AHS) for the referenced project pursuant to 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. As stated in prior correspondence, SHPO concurs 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 also understands that although impacts to these sites has been minimized, they cannot be avoided.

Sites 105-72, 105-73, and 106-39 are significant for the information they can provide and the purpose of implementing the Data Recovery Plan is to mitigate their loss. Each of these sites is sizeable and complex. Because there is no other known complex such as this in Connecticut, SHPO requested a minimum of 18% hand excavation of the impacted site boundaries. SHPO also strongly supports the excavation of blocks at each site to better understand intra-site patterns. Because Sites 105-72 and 106-39 have favorable field conditions, a Ground Penetrating Radar (GPR) Survey will be completed prior to excavations to help guide the subsurface investigation. The proposed fieldwork, processing, and analyses described in the Archaeological Data Recovery Plan for Sites 105-72, 105-73, and 106-39 are consistent with the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*. SHPO understands that Sites 105-72 and 106-39 may extend outside of the examined Area of Potential Effect (APE). After the fieldwork is complete, a construction fence will be erected along the APE to prevent inadvertent impacts to potentially unexamined portions of the site. If possible, these locations should be indicated on permanent project mapping as sensitive resource areas. In addition, although Site 105-24 was

avoided as part of the currently proposed project, it also will be fenced off during construction and should be similarly designated on project maps.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's archeological resources. We are available, as needed, for technical assistance or guidance as the project moves forward and we look forward to reviewing the Unanticipated Discoveries Plan when it is complete. For additional information, please contact Catherine Labadia, Environmental Reviewer, at (860) 500-2329 or [catherine.labadia@ct.gov](mailto:catherine.labadia@ct.gov).

Sincerely,



Jonathan Kinney  
Deputy State Historic Preservation Officer

cc (all via email):      Clarissa Fuller, Amtrak  
                                  Johnette Davies, Amtrak  
                                  David Leslie, AHS  
                                  Mary Kay Murray, FRA  
                                  Katherine Zeringue, FRA