

January 11, 2023

Mr. David George
Heritage Consultants LLC
830 Berlin Turnpike
Berlin, CT 06057
(sent only via email to dgeorge@heritage-consultants.com)

Subject: Archaeological Reconnaissance Survey
21 Gurley Road
Waterford, Connecticut

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the Cultural Resources Reconnaissance report titled *Phase IB Cultural Resources Reconnaissance Survey of a Development Area at 21 Gurley Road in Waterford, Connecticut* (dated June 2022) prepared by Heritage Consultants, LLC (Heritage) for the referenced project. SHPO understands that the proposed project entails the construction of a development consisting of six commercial buildings with associated site improvements that include the construction of new roads, driveways, utilities, and stormwater drainage structures. The subject parcel consists of approximately 22.2 acres on the north side of Gurley Road. The archaeological survey was completed in support of a Stormwater Discharge permit issued by the Department of Energy and Environmental Protection. The submitted report meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*

Background research revealed nine previously recorded precontact archaeological sites (Sites 45-25, 45-40, 45-44, 152-106, 152-107, 152-108, 152-109, 152-124, and 152-129) and 10 previously recorded historical period archaeological sites (Sites 45-39, 45-48, 45-61, 152-37, 152-67, 152-75, 152-81, 152-130, 152-131, and 152-134) located within a mile of the project area. One of the identified sites, Site 152-75 (The Almshouse Site/Waller-Moore House), was identified within the project parcel but outside of the Area of Potential Effect (APE) associated with the project. Site 152-75 is a contributing element to the Oil Mill Historic District. The Oil Mill Historic District is currently pending listing on the National Register of Historic Places (NRHP).

During the reconnaissance survey, 91 of 94 planned shovel tests were excavated at 15-meter intervals throughout the APE. The three planned but unexcavated shovel tests fell within areas of standing water. The field effort resulted in three shovel tests positive for historical period cultural material. The identified cultural material included a machine-cut nail, a wire nail, a clear window glass shard, a plain creamware sherd, and a pearlware sherd recovered from plowzone and fill contexts. No additional archaeological examination of the APE was recommended prior to construction. SHPO concurs that no additional archaeological investigation within the APE, as currently proposed, is warranted and that no archaeological resources will be impacted by the

proposed development. However, SHPO recommends additional archaeological investigation if construction plans change to include impacts to portions of the project parcel not subjected to subsurface archaeological testing.

Finally, Site 152-75 is an important and tangible remnant of Waterford's social history. Archaeology often is the only thing that remains for people that the history books did not record. This site offers a unique insight and tremendous research potential into the lives of these societal outcasts. As a result, SHPO requires assurances that Site 152-75 will not be impacted by the currently proposed project. Our office recommends indicating the boundaries of Site 152-75 on project maps as a sensitive resource area and installing construction fencing around its perimeter. SHPO also strongly urges the developer to consider placing a preservation easement on Site 152-75 to allow our office the opportunity to comment on any future development that may impact it.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's archeological resources. This letter updates and supersedes all previous correspondence regarding the proposed project. Do not hesitate to contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, for additional information at (860) 500-2248 or cory.atkinson@ct.gov.

Sincerely,



Jonathan Kinney
State Historic Preservation Officer