

September 14, 2021

Kyle Haubert, P.E.
CLA Engineers, Inc.
317 Main Street
Norwich, CT 06360

Dear Mr. Haubert:

Thank you for the information regarding the proposed subdivision located off Roxbury Road, East Lyme (Niantic). As part of the East Lyme permitting process, the Office of State Archaeology is required to review projects regarding potential impacts to historical-archaeological resources. The project lies on a hill referred to as Indian Woods just over a mile northwest of Niantic Bay and adjacent to another subdivision reviewed by this office in 2019^[1]. The area to be developed includes a ca. 8.6-acre parcel of which approximately five acres comprise the five proposed house lots, with planned dwellings, driveways, and associated infrastructure; varying degrees of grading will also be required to build the project. Approximately three acres of the total project area is also slated for open space.

Soils in the project area consist primarily of very rocky Charlton-Chatfield complex developed on glacial till. While this soil type is not in itself an archaeologically sensitive environmental indicator, the location of the proposed project is considered to have a high archaeological sensitivity for the presence of Native American sites based on its general proximity to the Nehantic Indian homelands. Prior archaeological testing has established that the Niantic Bay area was a focal point of Native American activity, and the area remained Nehantic territory through much of the 19th century. The 1854 Baker Map of New London County shows no historic development in this area. The 1934 Fairchild aerial photo also shows little development in the project area vicinity.

Because of the potential presence of Native American archaeological resources, the Office of State Archaeology recommends that a Phase Ia/Ib Assessment/Reconnaissance survey be undertaken prior to the proposed development. The survey should be conducted in accordance with State Historic Preservation Office standards as defined in the *Environmental Review Primer for Connecticut Archaeological Resources*, as revised (<https://portal.ct.gov/-/media/DECD/Historic-Preservation/Environmental-Review-Primer-for-CTs-Archaeological-Resources.pdf?la=en>). A list of Cultural Resource Management firms trained to undertake such a survey is included with this letter. The survey would include a short historical background review of the property in addition to the excavation of archaeological shovel test pits within the area of proposed ground disturbance to establish the presence or absence of archaeological remains (i.e. focused on the houses, septic/leaching fields, driveways, and other areas of project-related ground disturbance). If artifacts or cultural features suggesting the potential presence of a significant archaeological resource are encountered, some additional testing may be required to establish the site's

^[1] Letter from Brian Jones, Office of State Archaeology (OSA), to Robert Pfanner, J. Robert Pfanner & Assoc. P.C, regarding Proposed Roxbury Rd Subdivision, East Lyme (Niantic). March 18, 2019. Letter on file at OSA.

National Register eligibility. Should the finds be determined to be insignificant, no further work would be required. The results of the survey can be presented to my office as a condensed memorandum report for review.

Should you have any questions, feel free to contact me at sarah.sportman@uconn.edu or (860) 617-6884.

Sincerely,



Sarah P. Sportman, Ph.D.
State Archaeologist

cc: Gary A. Goeschel II, Director of Planning, East Lyme