



Determination of Effect on Historic Properties

Author:	Dr. Kimberly Kasper	Date:	July 9, 2025
Project:	State No.: 0162-0161 F.A.P. No.: 6162(016) Project Title: Replacement of Bridge No. 05126 (White Street over Still River) Town: Winchester		
Finding of Effect:	No Historic Properties Affected		

Project Description:

The Connecticut Department of Transportation (CTDOT), with funding support from the Federal Highway Administration (FHWA), proposes the replacement of Bridge No. 05126 on White Street over the Still River in Winchester. Bridge No. 05126 is a 2-span structure that carries White Street over Still River in the Winchester. The bridge is located approximately 50 feet east of the intersection of White Street with US Route 8. The bridge superstructure comprises of five (5) steel rolled beams with welded bottom flange cover plates and a concrete deck. The bridge superstructure is supported by concrete abutments and a center pier with foundations comprising of spread footings on soil. The bridge was originally built in 1956 and is approximately 69 years old. The bridge was rehabilitated in 1991, which may have included concrete deck repairs, new overlay and painting of steel beams (Rehab Plans are not available). The bridge has a 22'-0" wide roadway curb-to-curb width and has two equal span lengths of 64.0' each with a total structure length of 134.0'. The bridge carries a 5'-0" wide sidewalk along the south side. Still River flows mainly under the westerly Span 1 of the bridge from the south to the north. The bridge superstructure supports a water main and a gas main while there are overhead utilities present along the south side of the structure. The bridge is not considered to be historic.

Based on the poor condition of the existing deck, substandard load carrying capacity of the superstructure and the bridge reaching the end of its service life (50-75 years), a full replacement is proposed. Out of abundance of caution, the Town has installed barriers and restricted the bridge to a stop sign controlled alternating one-way traffic operation. The existing bridge will be replaced with 2 – 65' long continuous span steel beam bridge with concrete abutments, wingwalls and a center pier with micropiles socketed to bedrock to support the superstructure and eliminate scour concerns. A single span bridge eliminating the center pier was considered at this site, but the depth of the superstructure

required and the inability to raise the roadway profile due to the presence of nearby Route 8 intersection worsens the hydraulic performance at the crossing. The proposed work for a full replacement will involve:

1. Removal of the existing bridge superstructure and substructure including abutments and pier.
2. Construction of approximately 135' +/- long two span steel beam bridge superstructure to carry a 24'-0" wide roadway and a 5'-6" northern sidewalk meeting FHWA and CTDOT design standards. The superstructure will be supported by new concrete abutments and a center pier with pile foundations designed for scour.
3. The proposed bridge rail system will comprise of an aesthetically pleasing open bridge rail system meeting current safety standards.
4. Roadway will be reconstructed approximately 100' to west up to the intersection with Rt. 8 and 250' at the east approach from the bridge resulting in 500' of project limits.
5. New guiderails will be installed at all four approach corners to the bridge to meet current design standards.
6. Traffic will be detoured during construction.

According to the 2019 Connecticut Interactive Bike Map, the location of Bridge No. 05126 on White Street is not considered a suitable bicycle roadway, nor is it located on the Connecticut Statewide On-Road or Off-Road Bicycle Planning Network. North Main Street (Route 8) is located immediately to the west of Bridge No. 05126 and is identified as suitable according to the 2019 Connecticut Interactive Bike Map, but it is not located on the statewide planning network. White Street is a local road that has no sidewalks beyond the bridge approaches. Upon completion of the bridge rehabilitation, a sidewalk will continue to provide access over the bridge and will extend over the entire 500-foot of proposed roadway reconstruction from the intersection of Route 8 to the intersection of White Street with Nanni Drive located southeast of the bridge.

Under the provisions of the Programmatic Agreement executed between CTDOT, FHWA, the Connecticut State Historic Preservation Officer (CT SHPO), and the Advisory Council on Historic Preservation regarding compliance with Section 106 of the National Historic Preservation Act (NHPA) for minor transportation projects¹, the Office of Environmental Planning (OEP) intends to make a determination of effect on historic properties for the described undertaking.

Resources Potentially Affected:

Area of Potential Effects (APE)

Based upon the character of the proposed scope (replacement of the bridge within effectively the same footprint, only minor adjustments to the existing roadway profile, and improvements to the existing

¹ *Programmatic Agreement among the Federal Highway Administration, the Connecticut Department of Transportation, the Connecticut State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Implementation of Minor Transportation Projects*, signed October 26, 2012 and revised May 4th, 2018. Accessible online at: www.ct.gov/culturalresources

roadway along both approaches), it was determined that the area of potential effect (APE) should be limited to the bridge, roadway, and immediately abutting properties, upon which the implications of construction, both visual and audible, would be the most prevalent (see attached OEP Historic Property Review Maps). As such, the area of potential effect (APE) for State Project #0162-0161 is limited to approximately 160' x 400' of roadway ROW, including, as well as extending east and west of Bridge #05126, and the various permanent and temporary easement areas required to complete the project.

Both the National Park Service's digital asset record system and ConnCRIS—the online cultural resource geodatabase maintained by the Connecticut State Historic Preservation Office (CT SHPO)—were consulted for the purpose of locating any properties listed on the State or National Register of Historic Places (NRHP) in the project vicinity. There are no State Registered (SR)/National Register of Historic Places (NRHP) or potentially eligible properties within or adjacent to the area of potential effects (APE). The closest property, the NRHP-listed Gilbert Clock Factory at 13 Wallens Street, is approximately 0.14 miles away. There is also the Winstead Green Historic District just under .59 miles from the APE.

A series of historic maps and aerial photographs obtained from the University of Connecticut Map and Geographical Information Center (UConn MAGIC) were examined to assess the possibility of other potentially NRHP-eligible resources located within the project area of potential effect (APE). There are no eligible properties within or adjacent to the APE. However, there are several properties up to 1 miles from the APE: 1) a series of barns - 29, 59, 111, and 133, and Wallens Street (.15 to .60 miles south/southeast); 2) Kellogg Hayden Tavern – 221 Old North Rd (.96 miles east); 3) First Church Site – 242 Old North Road (.97 miles northeast); 4) Brown Machine Co. – 205 Walnut St. (.37 miles southwest); 5) Morgan Silver Plate Co. – 119 Willow Street (.96 miles southwest); 6) Soldier's Monument, Winsted, East End Park – 13 North Main Street (.65 miles south) ; 7) Winsted Hosiery Co. – 210 Holabird Ave. (.65 miles south).

The 1930 Griswold-Spiess Map of reconstructed Native settlement in Connecticut circa 1625 depicts no concentrations of indigenous population in the project vicinity during the period of European Contact (see attached OEP Historic Property Review Maps). The 1811 Warren Map of Connecticut likewise presents no development in the immediate project area (see attached OEP Historic Property Review Maps). The 1854 Hopkins Map of Litchfield County depicts one structure in the southwest section of the APE (see attached OEP Historic Property Review Maps). There are several structures just west of the APE owned by R. Cook, J. R. Cook, J. Palmer, and J. Hitchcock. The 1934 Fairchild Series aerial photos reveal 3-4 structures to the west on Rt. 8, and three structures to the east along White St. within the APE (Figure 1). However, recent roadside and aerial photographs reveal no standing structures within or in immediate proximity to the project APE other than the bridge itself to evaluate for NRHP-eligibility (see attached OEP Historic Property Review Maps). According to OEP's most recent historic structures inventory research, Bridge Number 05126 was constructed in 1956 (and reconstructed in 1991) of fairly standard concrete and steel design and is therefore exempt from NRHP consideration. This project will have no effect on above ground historic resources.



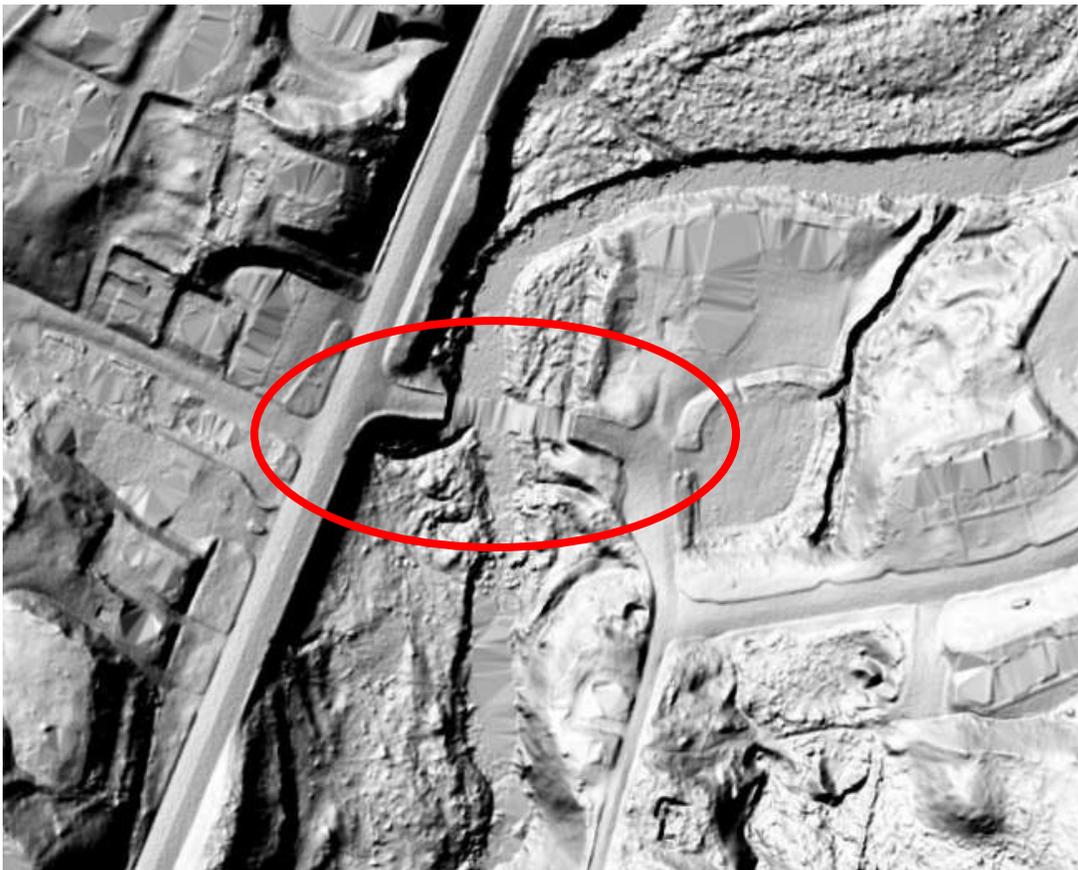
Figure 1. 1934 Fairchild Series aerial photo with approximate project area superimposed.

Below Ground Resources

Digital site records in ConnCRIS, as well as OEP's own internally maintained geodatabase, were also consulted for the purpose of identifying any previously known archaeological resources within the APE. There are no previously documented archeological sites are within or within 1.0 mile of the project area. The Bridge Abutments site (005-004) is the closest site at 2.38 miles east-northeast of the project area and is a post-contact bridge site that is listed as fair integrity. There are no previous archaeological surveys that are within or adjacent to the project area. There are 2 previous surveys that fall within 1.0 mile of the project area. Survey CHPC-2248 is the closest to the current project area and was a proposed solar center project that is 0.53 miles northwest of the project area completed in 2023.

Soil classification maps obtained from the U.S. Natural Resources Conservation Service were examined in conjunction with predictive models developed internally at OEP to assess the sensitivity of the project area for previously unknown pre-European Contact indigenous resources. The Udorthents-Urban land soils within the eastern half and extreme western half of the APE are "poor" soil sensitivity to the possibility of unidentified archaeological resources (see attached OEP Historic Property Review Maps). However, a 70 ft east-west corridor of Rippowam Fine Sandy Loam in the western half of the APE consists of "high" soil sensitivity to the possibility of unidentified archaeological resources (see attached OEP Historic Property Review Maps). After detailed review of past roadway/bridge projects, aerial photographs, and Lidar data (see attached OEP Historic Property Review Maps and Legacy Files of the Plan for Construction of the Relocation of Route 8 and Wallens Street Bridge and Figure 2), it appears

that the soils within the APE have been previously and extensively disturbed through construction and maintenance of the existing bridge/culvert and roadway. There is also significant disturbance in the northeastern section of the APE due to the construction of a modern machine shop. OEP sees little potential for impact on unidentified archaeological resources if the project remains confined to the existing previously disturbed transportation ROW. Should the work extend beyond the ROW, further evaluation will be required to confirm that no ground disturbances are required, or, if so, that the construction falls within an area comprised of previously disturbed soils. Due to the extensive disturbance from previous roadway, bridge, and house construction in the APE, OEP can advance a finding of no historic properties affected for the undertaking.



2023 Aerial LIDAR image with approximate project area superimposed.

Determination of Effect:

Consultation was carried out with Federally-recognized Native American Tribal authorities with ancestral ties to the State of Connecticut for this undertaking in May/June of 2025. None of the solicited Tribes expressed any concerns with the undertaking within the allotted time frame.

Given the lack of historic properties found to exist within the project limits and minimal potential for impacts to undocumented intact archaeological resources, OEP hereby determines a finding of *no historic properties affected* for the undertaking. With this determination, FHWA, through OEP, has concluded its

responsibility to consider the potential effects of the described project on cultural resources under Section 106 of the NHPA via the provisions of the Programmatic Agreement referenced above.

A handwritten signature in black ink, appearing to read 'Kasper', written over a horizontal line.

Dr. Kimberly Kasper
Transportation Planner 2 – Archaeology
Office of Environmental Planning – Cultural Resources Unit
Connecticut Department of Transportation

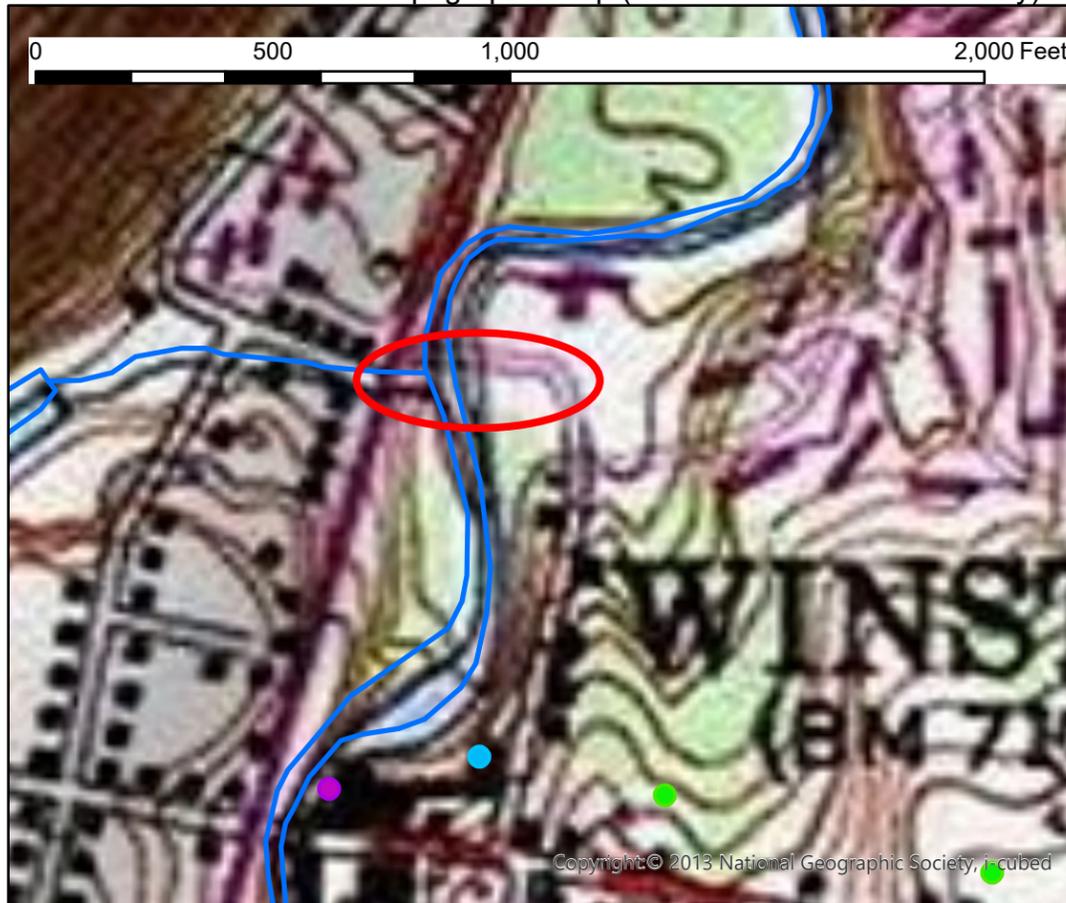
Recent Aerial Photography (w/Soil Sensitivity Overlay)



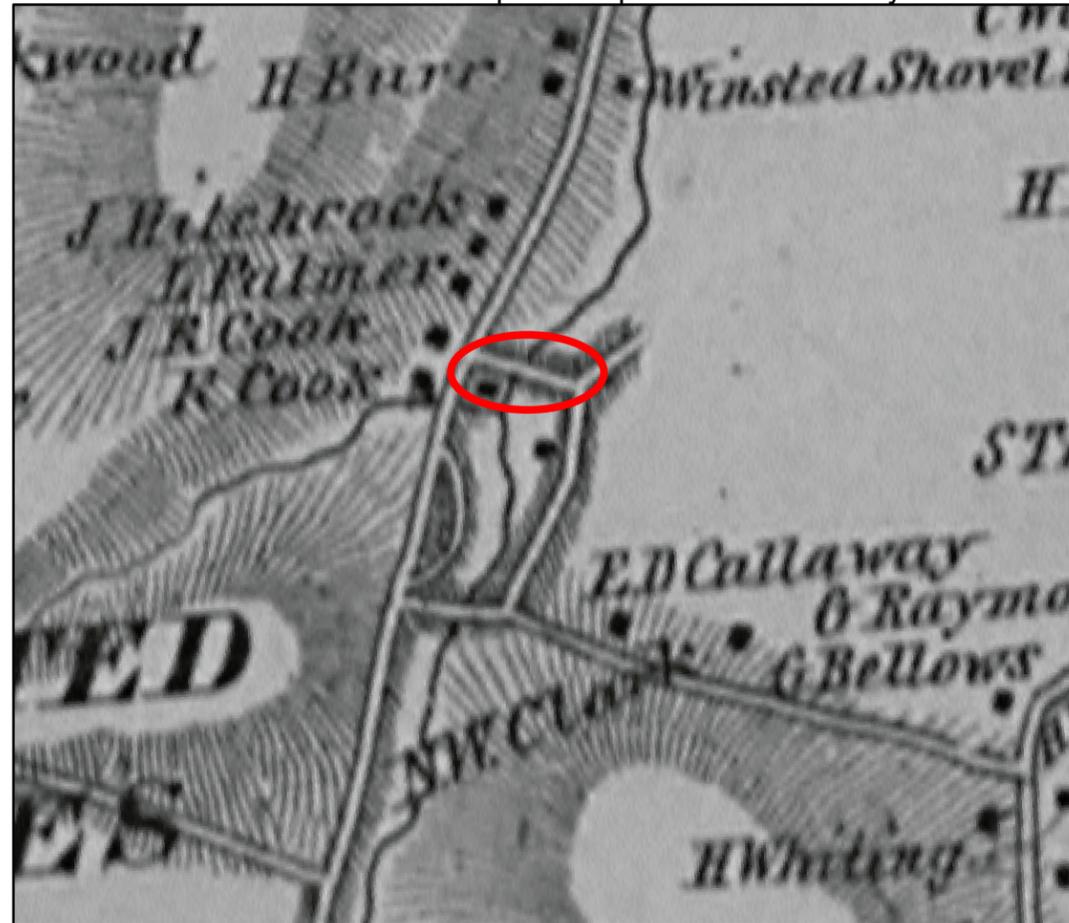
1811 Warren Map w/Overlay of Griswold/Spiess Map of Contact Period Native Settlement c.1625



Detail of USGS Topographic Map (w/Historic Resources Overlay)



Detail of 1854 Hopkins Map of Litchfield County



CT Department of Transportation Office of Environmental Planning Environmental Review - Historical and Archaeological Resources

State Project Number 162-161
Replacement of Bridge No. 05126
(White Street over Still River)
Winchester

Historic Properties

- National Historic Landmarks
- National Register
- National Register Non-Contributing
- State Register
- State Register Non-Contributing
- Local
- Inventoried
- NRHP_Historic_Districts
- Local Historic Districts
- Cemetery

Approximate Location of Archaeological Sites

- ▲ Pre-Contact
- Historic
- Unknown
- Archaeological Survey Areas
- HydroLine_Identity

Predicted Archaeological Soil Sensitivity

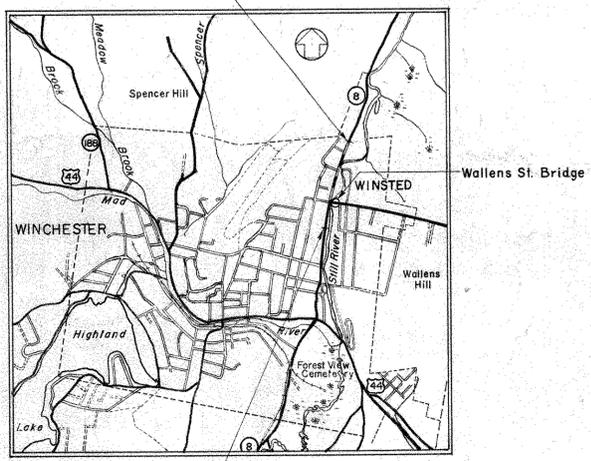
- High
- Low
- Moderate
- Poor
- Unknown
- Variable



April 29, 2025

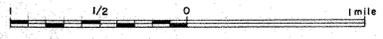


END OF FEDERAL AID PROJECT N^o. F-51(2)



BEGINNING OF FEDERAL AID PROJECT N^o. F-51(2)

LOCATION PLAN



CONNECTICUT STATE HIGHWAY DEPARTMENT PLAN FOR CONSTRUCTION

OF THE RELOCATION OF ROUTE 8 & CONSTRUCTION OF WALLENS STREET BRIDGE IN THE TOWN OF WINCHESTER

FROM STA. 10+00 TO STA. 31+00
 LENGTH 2100 FT.

SCALES PLAN 1 IN. = 40 FT.
 PROFILE HOR. 1 IN. = 40 FT. VERT. 1 IN. = 4 FT.
 CROSS SECTIONS 1 IN. = 5 FT.

ROUTE 8 TO BE MAINTAINED BY THE STATE
 WALLENS STREET BRIDGE TO BE MAINTAINED BY THE TOWN

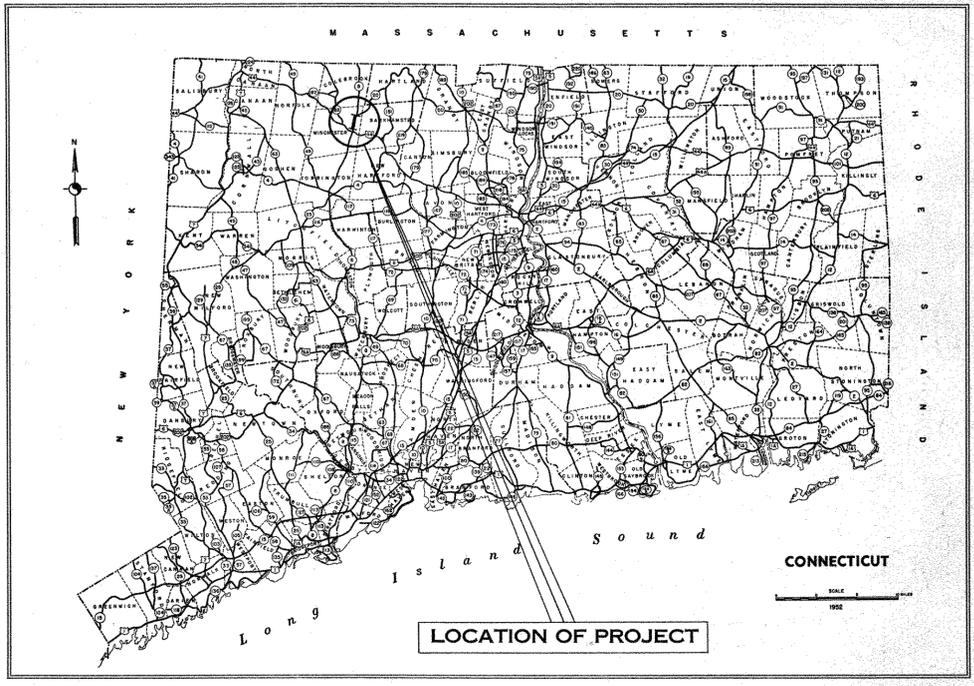
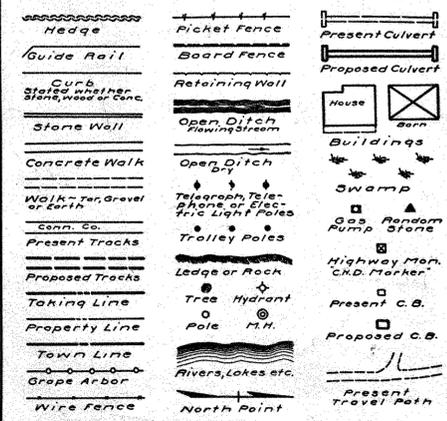
FEDERAL AID PROJECT NO. F-51(2)
 FEDERAL AID LENGTH = 1750 FT.
 FROM STA. 11+50 TO STA. 29+00

LIST OF DRAWINGS

Sheet No.	Title
1	Title Sheet
2	Index Plan & Profile
3 & 4	Detailed Estimate Sheets
5	Typical Cross Sections
6-11	Plans & Profiles
12 & 12A	Utility Relocation Sheets
13	Retaining Walls
14	Borings
15-21	Structure Sheets - Wallens Street Bridge & Box Culvert Extension
22-37	Cross-Section Sheets - Connecticut Route 8
38	Cross-Section Sheet - Wallens Street
	Standard Drawings
217B	Construction Details & Fittings for Two-Cable Guide Railing
221F	Endwalls, Slope Paved Inlets & Outlets
221H	Underdrains and Outlets, Perforated Pipe, Cradle Invert Clay Pipe
222A	Concrete Steps, Curbs, Gutters, Concrete Sidewalk, Paved Ditch - Jan. 1940
223A	Standard Manhole, Frame & Cover
226	Standard A.C.C.M. Drop Inlets and A.C.C.M.P. Elbows
228A	Type "C" Catch Basin, Type "C" Drop Inlet
228C	Type "C-L" Catch Basin, Type "C-L" Drop Inlet
228D	Steel Frame & Grate for Type "C", "C-L", "C-G" Catch Basin & Drop Inlet
712A	Fences, Barways, Barricades, Tree, Well and Root Protection, Service Bridges, Slope Paving
714	Reinforced Concrete Marker Posts for Federal Aid Projects
718	Temporary Field Office for State Highway Department Forces
720	Construction Signs, Barricades and Flashers

THE INFORMATION, INCLUDING ESTIMATED QUANTITIES OF WORK, SHOWN ON THESE SHEETS IS BASED ON LIMITED INVESTIGATIONS BY THE STATE AND IS IN NO WAY WARRANTED TO INDICATE THE TRUE CONDITIONS OR ACTUAL QUANTITIES OR DISTRIBUTION OF QUANTITIES OF WORK WHICH WILL BE REQUIRED.

STANDARD CONVENTIONS



1955 SPECIFICATIONS, FORM NO., 808 GOVERN

TOWN NO. 162
 PROJECT NO. 66

ALL ELEVATIONS ON THIS PROJECT
 BASED ON U.S.C. & G.S. DATUM

ASSUMED DESIGN SPEED 40 M.P.H.
 ANTICIPATED A.D.T. IN 1975 5600
 C.H.D. CLASSIFICATION "D" URBAN

Construction Started October 7, 1957
 Construction Completed August 20, 1958
 Tracings Revised By Goodkind & O'Dea
 Tracings Checked By Howard, Needles, Tammen, & Bergendoff

DEPARTMENT OF COMMERCE
 BUREAU OF PUBLIC ROADS

RECOMMENDED FOR APPROVAL:
 [Signature] DISTRICT ENGINEER DATE []

APPROVED:
 [Signature] DIVISION ENGINEER DATE []

SUBMITTED AUGUST 1 1957
 GOODKIND & O'DEA, CONTRACTING ENGR.
 BY *Arnold R. Goodkind*
 CONN. PROF. ENGR'S LICENCE N^o. 3490

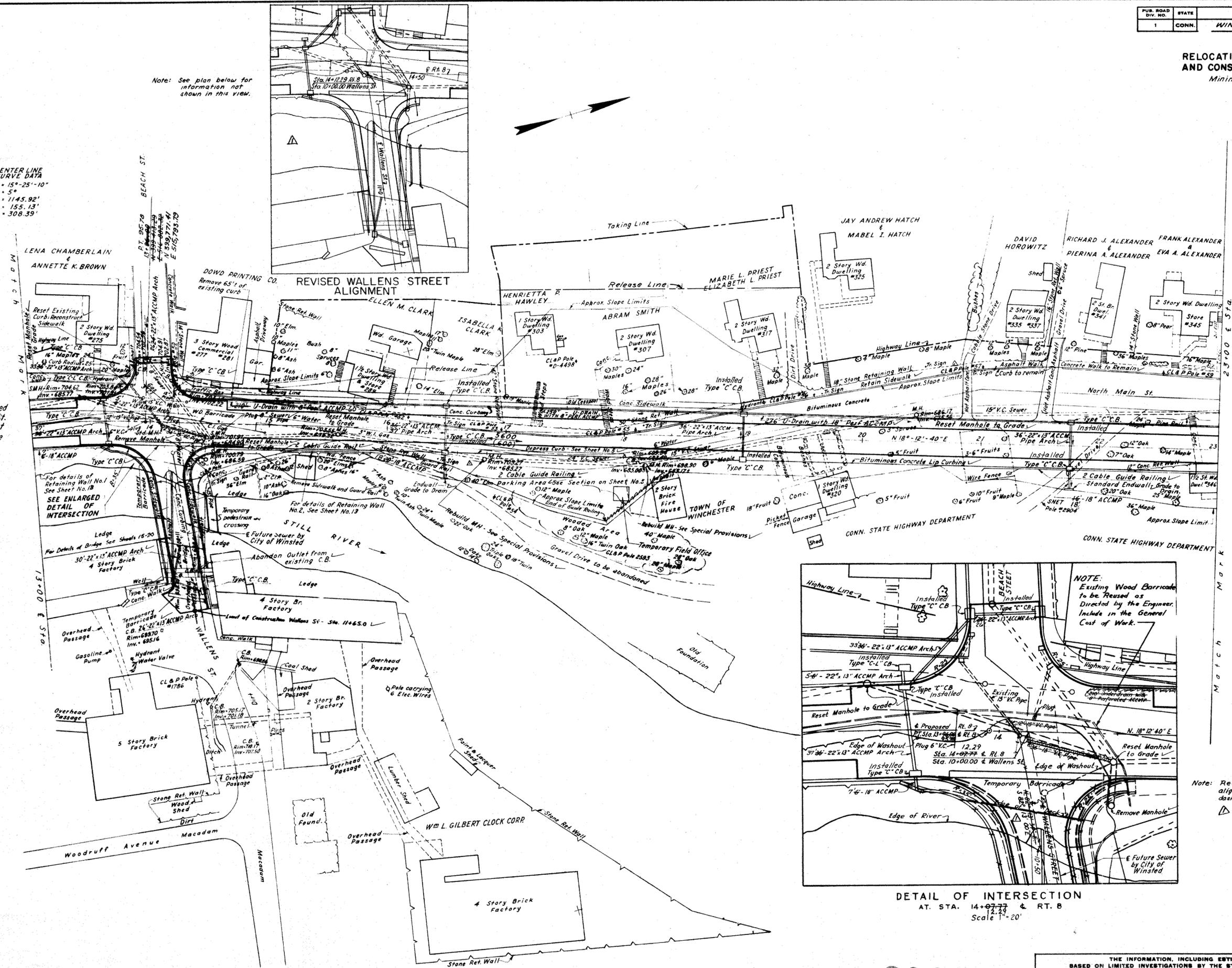
REVIEWED AND APPROVED *Aug. 3* 1957
 HOWARD, NEEDLES, TAMMEN & BERGENDOFF
 BY *C. Arnold Dill*

ACCEPTED *August 5* 1957
 CONNECTICUT STATE HIGHWAY DEPARTMENT
 BY *George S. Cook*
 ENGINEER OF SURVEYS & PLANS

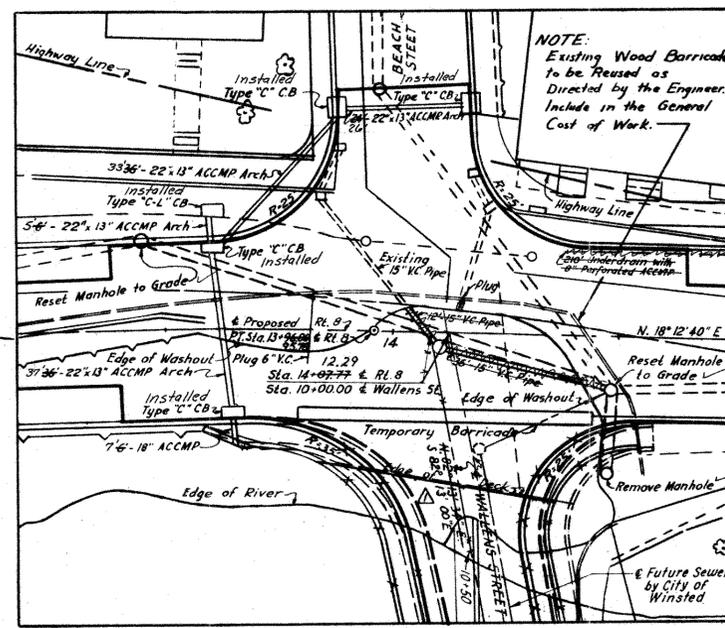
RELOCATION OF CONNECTICUT ROUTE 8
AND CONSTRUCTION OF WALLENS ST. BRIDGE
Minimum Width of Right of Way = 90'

Note: See plan below for information not shown in this view.

CENTER LINE CURVE DATA
 $\Delta = 15^{\circ}25'10''$
 $D = 5'$
 $R = 1145.92'$
 $T = 155.13'$
 $L = 308.39'$



Note: For revised Wallens St. alignment see above



DETAIL OF INTERSECTION
AT STA. 14+67.77 & RT. 8
Scale 1" = 20'

NOTE: Existing Wood Barricade to be Reused as Directed by the Engineer. Include in the General Cost of Work.

Note: Revised Wallens St. alignment shown dashed.

CHANGE OF PLAN

REVISIONS		
NO	DATE	DESCRIPTION
1	10-21-57	Wallens St. Alignment

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U.S. Department
of Transportation
**Federal Highway
Administration**

Connecticut Division

July 2, 2025

450 Main Street
Suite 612
Hartford, CT 06103
860-659-6703
860-659-6724
Connecticut.FHWA@dot.gov

In Reply Refer To:
HDA-CT

Dear CTDOT Cultural Resources Unit:

The Federal Highway Administration (FHWA) has conducted and concluded tribal consultation for transportation undertakings, as requested by your office. On May 9, 2025, FHWA electronically delivered information about applicable undertakings to those Federally recognized Indian tribes which have an identified area of interest including the project area.

On June 9, 2025, the Delaware Tribe Historic Preservation Office requested additional time beyond 30 days to complete their review of the submission, and on June 26, 2025, the THPO indicated no comment or concern regarding the following projects. Please see attached copy of this communication and note any requested further action from the THPO. Our letter of June 23, 2025, included copies of other referenced communication.

The following undertakings have undergone tribal consultation:

State Project Number	Description	Summary Comments Received from Tribe(s)
0083-0278	<i>Rehabilitation/Replacement of Bridge #00137 (Milford, New Haven County) [FAP #0951(400)]</i>	No historic properties affected. Mohegan Tribe – email no concerns 6/2/2025. MPTN – email no concerns 6/6/2025. Del Tribe - email no concerns 6/26/2025. No additional responses received. No further consultation anticipated for this project as proposed.
0097-0101	<i>Replacement of Bridge No. 05970 (Norfolk, Litchfield County) [FAP #6097(008)]</i>	No historic properties affected. SMC email no concerns 5/23/2025. Mohegan Tribe – email no concerns 6/2/2025. MPTN – email no concerns 6/6/2025. Del Tribe - email no concerns 6/26/2025. No additional responses received. No further consultation anticipated for this project as proposed.
0102-373G/ 0102-0379	<i>Wall Street Safety Improvements (Norwalk, Fairfield County) [FAP #H202(001)]</i>	NAE anticipated. SMC email no concerns 5/23/2025. Mohegan Tribe – email no concerns 6/2/2025. MPTN – email no concerns 6/6/2025. Del Tribe - email no concerns 6/26/2025. No additional responses received. No further consultation anticipated for this project as proposed.
0153-0127	<i>Main Street Improvements Project (Route 63) (Watertown, Litchfield County) [FAP #PEDS(243)]</i>	NAE anticipated. SMC email no concerns 5/23/2025. Mohegan Tribe – email no concerns 6/2/2025. MPTN – email no concerns 6/6/2025. Del Tribe - email no concerns 6/26/2025. No additional responses received. No further consultation anticipated for this project as proposed.
0162-0161	<i>Replacement of Bridge # 05126 (Winchester, Litchfield County) [FAP #6162(016)]</i>	No historic properties affected. SMC email no concerns 5/23/2025. Mohegan Tribe – email no concerns 6/2/2025. MPTN – email no concerns 6/6/2025. Del Tribe - email no concerns 6/26/2025. No additional responses received. No further consultation anticipated for this project as proposed.

To: CTDOT Cultural Resources Unit
From: Emilie Holland, FHWA Connecticut Division
July 2, 2025
Page 2 of 2

With this letter, the Tribal consultation period is concluded for the submitted documents related to undertakings identified herein. FHWA has continuing consultation responsibilities to respond to comments and requests for information received from the Tribes, as well as providing opportunities for Tribal review and comment on reports and documents relating to projects for which they are identified as consulting or concurring parties.

We look forward to working with your office to resolve any comments provided by Tribes. FHWA appreciates your continued cooperation in tracking Tribal consultation outcomes and your assistance in ensuring that commitments made to Tribes are met. If you have any questions, please contact me telephone at 860-494-7577 or by email at emilie.holland@dot.gov.

Sincerely,

M EMILIE HOLLAND Digitally signed by M EMILIE HOLLAND
Date: 2025.07.02 08:04:03 -04'00'

M. Emilie Holland
Environmental Protection Specialist
FHWA Connecticut Division

Enclosures

From: [Joanna Maurer](#)
To: [Holland, Emilie \(FHWA\)](#)
Cc: [Martina Thomas](#)
Subject: Re: May 2025 - FHWA CT - Consultation Follow Up (Delaware Tribe)
Date: Tuesday, July 1, 2025 9:54:54 AM
Attachments: [DN InadvDisc Policy \(1\).pdf](#)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Emilie,

I apologize. I looked back and realized I don't believe I attached the inadvertent discovery policy (or at least it doesn't look like I did on my end). Just in case, I am attaching it in this email.

Thank you,
Joanna

Joanna Maurer (she/her/hers)
GIS Specialist and Archaeologist
Section 106 Reviewer
Delaware Tribe of Indians
Historic Preservation Office
jmaurer@delawaretribe.org

From: Joanna Maurer <jmaurer@delawaretribe.org>
Sent: Thursday, June 26, 2025 10:10 AM
To: emilie.holland@dot.gov <emilie.holland@dot.gov>
Cc: [Martina Thomas](mailto:mthomas@delawaretribe.org) <mthomas@delawaretribe.org>
Subject: Re: May 2025 - FHWA CT - Consultation Follow Up (Delaware Tribe)

Good morning Emilie,

Thank you very much for the work you put into sending all of these project attachments to me via email.

I am formally letting you know that our office has reviewed the scope of work and potential impacts of the following 5 FHWA CT projects:

- SPN 0083-0278 Rehabilitation/Replacement of Bridge #00137 (Milford, New Haven County). [FAP #0951(400)].

SPN 097-0101 Replacement of Bridge No. 05970 (Norfolk, Litchfield County). [FAP #6097(008)].

- SPN 0102-0373G/0102-0379 Wall Street Safety Improvements (Norwalk, Fairfield County). [FAP #H202(001)].
- SPN 0153-0127 Main Street Improvements Project (Route 63) (Watertown, Litchfield County). [FAP #PEDS(243)].
- SPN 0162-0161 Replacement of Bridge # 05126 (Winchester, Litchfield County). [FAP #6162(016)].

We have no comments or concerns on any of the 5 projects at this time. However, during the course of the work please keep us in the loop if any inadvertent discoveries are made. I have attached an inadvertent discovery policy that we created in collaboration with our Sister Nation, the Delaware Nation. It is on Delaware Nation letterhead, but we worked on this with them in response to another project where protocols for sensitive cultural items were not followed. Please let us know if this needs to be on Delaware Tribe letterhead to be used by FHWA CT.

For these 5 FHWA CT projects (and other projects if/when they arise) we would like to receive a phone call immediately if any cultural items or features listed on this policy document are found (not just human remains, but any cultural items/features listed here), and work halted until we can review the findings.

Additionally, since I was able to access the files and review them, I don't feel the need to have a meeting to discuss these at this time. Although, if you have any questions or would like to talk more in depth about the attached inadvertent discovery policy, please let me know and we can still set something up.

Sincerely,

Joanna Maurer (she/her/hers)

GIS Specialist and Archaeologist

Section 106 Reviewer

Delaware Tribe of Indians

Historic Preservation Office

jmaurer@delawaretribe.org

DELAWARE NATION HISTORIC PRESERVATION
Inadvertent Discovery Policy & Protocols for Archaeology Consultation

The purpose of this policy is to outline procedures and expectations for tribal consultation to be followed by all agencies, contractors, etc. during ALL archaeological work, and/or in the event of an inadvertent discovery of human remains or cultural archaeological materials affiliated as Native American within Delaware Nation's homelands and areas of interest.

Procedures for Inadvertent Discovery of Funerary Remains and Objects:

1. If ANY potentially sensitive Native American archaeological resources (see list on next page), human remains, or animal burials are encountered, all onsite work shall cease in the immediate area with a 50-foot buffer of the discovery location until Delaware Nation is consulted or unless prior agreements are in place. See list on next page for resources or feature warranting notification to our office.

2. The lead agency shall contact the following representatives immediately (concurrently with the SHPO):

Carissa Speck, *Historic Preservation Director*
cspeck@delawarenation-nsn.gov
405-901-1715 x 1301

Katelyn Lucas, *Historic Preservation Officer*
klucas@delawarenation-nsn.gov
405-544-8115

3. Place tobacco (looseleaf preferred) with human remains and/or funerary objects if possible, and cover and/or wrap them with a natural fiber cloth such as cotton or muslin (unbleached).

4. Absolutely NO photographs are to be taken of human remains, animal burials, or funerary objects, nor drawings made, unless deemed necessary in consultation with Delaware Nation. Any photographs or drawings should be redacted from any reports that will be broadly distributed, along with locational details. Just using written or textual descriptions of sites is preferred.

5. Human or animal remains and any items deemed funerary or sacred should NOT be cleaned or processed, and handling should be limited. Non-destructive "in-field" documentation of the remains and cultural items shall be carried out in consultation with Delaware Nation, who will determine appropriate methods of recordation depending upon the circumstances.

6. The preferred treatment of funerary materials and human or animal burials is to leave them in-situ (in place) and protect them from further disturbance. If remains and/or cultural items are to remain in-situ, the requirements of 43 CFR 10 Sections 10.4-10.6 will have been fulfilled.

7. Our preference is that NO remains or potential funerary artifacts should be taken off site and should be housed in on-site facilities until Delaware Nation consults on next steps. If remains or artifacts must be removed from the site, procedures must be determined in consultation with Delaware Nation. Delaware Nation requests that no artifacts, but especially funerary remains and objects, should ever be removed from the state they were found in, including for lab documentation or analysis purposes.

8. The specific location(s) of discoveries shall be withheld from public disclosure (with the exception of local law officials, necessary consulting agencies, and tribal officials as described above) and protected to the fullest extent by federal law.

DELAWARE NATION HISTORIC PRESERVATION Inadvertent Discovery Policy & Protocols for Tribal Consultation

Delaware Nation's Historic Preservation Office treats ALL discoveries of Native American materials or features during any archaeological survey work and/or data recovery work essentially the same as inadvertent discoveries. We request daily or weekly updates on what artifacts and features are found (if any) so that we can consult on ALL stages of the work. We may send tribal monitors to be onsite during work, but still request updates regardless of whether or not we sent monitors to ensure everyone is kept informed and given time to review findings. Even in data recovery work where we expect that artifacts and/or remains will need to be removed and relocated to avoid destruction, we still expect to be consulted throughout the process to ensure all potential funerary or otherwise sacred materials are identified correctly and handled properly.

General Guidelines for Archaeological Work:

- NO artifacts should be taken off site, cleaned, processed, or be subject to invasive/destructive analysis—and should be housed in the on-site facilities—until they are reviewed by consulting Tribal Nations. **We underscore NO cleaning until review**, for cleaning both disrespects tribal protocols for sensitive materials and could destroy valuable scientific evidence on materials
- Our preference if human remains, animal burials, and/or funerary objects are discovered is always to leave them in-situ, halt all further work (following procedures on previous page), and request that projects avoid further impacts to the site
- If, in consultation with Delaware Nation, it is determined that funerary remains or objects canNOT be left in-situ and must be removed to protect them from destruction:
 - Any soils or other materials collected with them or having touched them should be kept with them, as Delaware Nation will also want those repatriated. This includes ALL materials found in one soil profile above and below, even charcoal, soil samples, any debitage or other items

General Guidelines for Identifying Sensitive Materials:

Anything found within the same soil profile, or one soil profile above and below, of human remains OR animal burials is also considered funerary by our office and should be treated as such. We will want to review more closely anything else found within half a mile of the location so that we can assess the broader cultural landscape. Workers should be able to provide general information on where materials are being found even during ongoing work, so that we can flag other potentially sensitive sites. Below is a general list of items we would flag as sensitive **even if remains are not immediately present**, and request be treated as sensitive unless we receive additional information that would suggest otherwise.

- Human remains
- Animal burials or remains of unusual or non-food species (dog, eagle, hawk, bear, turtle, otter, fisher, bison)
- Shell middens
- Pottery in the following categories: complete pieces, pieces with effigies, large deposits, pieces intentionally/ceremonially broken
- Anything with carvings or effigies
- Crystals, fossils, fossilized teeth or bone
- Wampum or treaty medals
- ALL personal items: including beads, jewelry, pendants, earrings, mirrors, combs, pipes (either complete pipes or pipe fragments), and human or animal figures. Sensitive beads include beads made of shell, bone/ivory, clay, wood, stone, or glass. European trade beads were adopted by Native Americans and used for personal clothing, jewelry, and ceremonial pieces.
- Any metal or metal alloy materials including copper or brass wire, pendants, clothing adornments
- Any fabrics, textiles, and/or woven items including grass mats, especially if found in proximity to personal items
- Any materials with evidence of painting on them, painting making, or storage of paints, especially ochre
- Large deposits of debitage, points, tools, especially ones that look like they were intentionally/ceremonially broken
- Anything found with evidence of burning