



# Town of Sudbury

## Community Preservation Committee

cpc@sudbury.ma.us

www.sudbury.ma.us/cpc

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OCT 07 2022

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278 Old Sudbury Road  
Sudbury, MA 01776  
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### PROJECT SUBMISSION FORM

Applicant: Kathryn J. McGrath (M.A. RPA) for SHC, Town of Sudbury

Submission Date:

October 7, 2022

Group or Committee Affiliation (if any): Sudbury Historical Commission

Applicant Address:

Flynn Building  
278 Old Sudbury Rd,  
Sudbury, MA 01776

Purpose (please select all that apply):

- Open Space & Recreation
- Community Housing
- Historic Resource

Applicant Email & Phone Number:

historical@sudbury.ma.us  
(978) 639-3346



Project Manager Email & Phone Number: Kathryn J. McGrath, kathrynjmcg@gmail.com, (502) 931-3743

Project Name: Town-wide Indigenous Cultural Landscape Study

Project Description: See attached sheet.

#### Costs:

Fiscal Year	Total Project Cost	CPC Funds Requested	Other Funding Sources (Amount and Source)
2024	\$35,000	\$35,000	N/A
2025			
2026			
2027			
2028			
<b>Total</b>			

How does this project meet the General Criteria and Category Specific Criteria for Community Preservation Committee projects (see attached)?

See attached sheet.

Does this project fall within the jurisdiction or interest of other Town Boards, Committees, Commissions, or Departments? If so, please list the boards, committees, commissions, or departments, whether applications and/or presentations have been made, and what input or recommendations have been given.

Select Board, Planning and Community Development Department, Planning Board, Historic Districts Commission.  
Presentations to be scheduled after finalizing.

#### For Community Preservation Committee Use:

Form Received On: 10-7-22

Project Presented to CPC On: \_\_\_\_\_

Reviewed By: R. Potter

Determination: \_\_\_\_\_

**Sudbury Historical Commission**  
**CPC Application for Indigenous Cultural Landscape Study FY 2024**

**Project Need**

The Sudbury Historical Commission is submitting this application to the Community Preservation Committee (CPC) for Community Preservation Act (CPA) funding to complete an Indigenous Cultural Landscape Study. This study fulfills a matrix action recommendation of the Town-wide 2022 Historic Preservation Plan (HPP), which was a project prescribed by Sudbury’s 2021 Master Plan. Protection of all of Sudbury’s historic and cultural resources, including archaeological, is an important tenet of both plans. Such resources have unique characteristics and requirements for their identification and management, including the need for intact patterning within undisturbed terrain and also an understanding of any continued cultural ties. Protection and preservation of these resources often falls outside of state and federal regulatory tools but are especially vulnerable to local land-use decisions resulting in ground-disturbance<sup>1</sup>.

Under MGL Chapter 40 Section 8D, the Historical Commission is charged to “protect, preserve and develop the historical and archaeological resources of the town.” Above-ground historical resources have for the most part been well identified and surveyed at the initiation of the Historical Commission. However, archaeological below-ground resources and Indigenous cultural landscapes have not and there is an urgent need to fill in the gap in knowledge about these historical resources.

This proposed Indigenous Cultural Landscape Study will provide Sudbury with the identification of and planning tools necessary to protect and manage these resources. This study will supplement the Master Plan’s Baseline Report<sup>2</sup>, which concentrated on the post-contact historic resources. Pertinent to the Master Plan’s Action Plan Matrix<sup>3</sup>, the current proposed study will address the following actions, two of which are short-term (within 5-years) actions and one of which is a Critical Path Action:

- A.2 Appropriate funding for and develop a town-wide Historic Preservation Plan with the involvement of stakeholders. Items addressed in the plan could include, but will not be limited to:
  - a) Ongoing survey and study of non-documented and under-documented historic and archaeological resources and/or those not fully understood. (Short-Term, within 5 Years; Critical Path Action)

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<sup>1</sup> Douglas Deur and Virginia L. Butler, Incorporating Archaeology into Local Government Historic Preservation and Planning: A Review of Current Practice, *Journal of the American Planning Association*, 82:2, 189-203, DOI: 10.1080/01944363.2015.1137222.

<sup>2</sup> Horsley Witten Group, Camoin Associates, and Fitzgerald & Halliday Inc., *Sudbury Master Plan, Baseline Report*, prepared for the Sudbury Master Plan Steering Committee, adopted April 28, 2021. Accessed September 19, 2022, [https://sudbury.ma.us/masterplan/wp-content/uploads/sites/392/2021/06/210428\\_SudburyMasterPlan\\_BaselineReport\\_FINAL\\_LowRes.pdf?version=ed02f66ac109dc7fca01f53b8fca1fd4](https://sudbury.ma.us/masterplan/wp-content/uploads/sites/392/2021/06/210428_SudburyMasterPlan_BaselineReport_FINAL_LowRes.pdf?version=ed02f66ac109dc7fca01f53b8fca1fd4)

<sup>3</sup> Horsley Witten Group, Camoin Associates, and Fitzgerald & Halliday Inc., *Sudbury Master Plan Appendix A Action Plan Matrix*, prepared for the Sudbury Master Plan Steering Committee, adopted April 28, 2021. Accessed September 19, 2022, <https://sudbury.ma.us/planning/wp-content/uploads/sites/328/2021/10/Action-Plan.pdf?version=bb570f61cd5a9e6ca4ffa9cbe705a6e9>

- A.4 Develop a sophisticated and accessible platform for the Town’s historic and archaeological resources inventory that can be used to support local permit review and educate residents and property owners.
  - a) Create a complete digital inventory of historic structures, sites, landscapes, roads, and significant features (e.g., stone walls) throughout Sudbury.
  - b) Identify and inventory historic structures, buildings, sites, and landmarks that have not been inventoried or those inventories which are out of date.
  - d) Link with GIS data to better inform and shape the effectiveness of preservation and planning policies. (Long-Term, more than 10 years. Note: access to be restricted with the sensitivity map to be the primary tool for planning and permitting decisions.)
  
- B.1 Develop a Historic Preservation Primer for all local boards, commissions, and committees that clearly describes the variety of historic preservation regulatory tools in the community, powers, and limitations, and how they function together. (Short-Term, within 5 Years. Note: study will be used to raise awareness of fragile, non-renewable archaeological resources in general without divulging locations.)

### **Project Description**

As recommended within the HPP, the proposed study will include a town-wide archaeological sensitivity assessment (i.e., reconnaissance survey or overview) and, if and when found, identify Indigenous site locations called Traditional Cultural Properties (i.e. locations associated with ceremonial, sacred, or other occupational connections). As explained within the HPP, the recommendation and goals are as follows:

***RECOMMENDATION:***

***Prepare a study of the Indigenous Cultural Landscape in Sudbury relating the Town’s various natural landscape areas with Native American occupation, use, and significance.***

- *Assess the characteristics of Sudbury’s glaciated landscape during the precontact period;*
- *Summarize Native American history with a special focus on the several hundreds of years prior to contact;*
- *Review known archaeological sites and resources that have been identified in Sudbury [i.e. existing conditions or baseline data];*
- *Review how Native American peoples used and impacted different character areas within the landscape;*
- *Assess the types of archaeological resources that might be found there today; and*
- *Prepare an archaeological sensitivity map for the Town.<sup>4</sup>*

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<sup>4</sup> Heritage Strategies, LLC, *Communitywide Historic Preservation Plan, Town of Sudbury, Sudbury, Massachusetts, 2022, III-11-12.* Prepared for the Sudbury Historical Commission and Planning and Community Development Department, Town of Sudbury.

At this time, to accomplish the above, it is envisioned this study will be comprised of the following four phases:

- Phase I. Preliminary baseline study, environmental conditions, preliminary sensitivity assessment, and preliminary sensitivity map.
- Phase II. Specialized analyses if appropriate and can be accomplished within budget. This may entail coordinating with other interested parties and funding.
- Phase III. Documentation of new sites through public events, targeted field site visits, and discussions with interested groups.
- Phase IV. Preparation of predictive model, final sensitivity map, and report. At this time, consultant may outline specific Research Questions for future work, such as:
  - Further delineation of Sudbury's paleo-landscapes.
  - Identification of raw material locations.
  - Indigenous culturally significant floral study.

**Relevance to CPC General Criteria**

The relevance of this application to the CPC General Criteria is provided in **Table 1**.

**Table 1. Application's Fulfillment of General Criteria.**

<ul style="list-style-type: none"> <li>•Are eligible for Community Preservation Act (CPA) funding according to the requirements described in the CPA legislation;</li> </ul>	<p>According to the Massachusetts Community Preservation Act (General Laws Chapter 44B, including all amendments through July 2021)<sup>5</sup>, archaeological resources that are either on the State Register (i.e., currently listed sites) and those the local historical commission deem significant will be based on this study.</p>
<ul style="list-style-type: none"> <li>•Are consistent with the Town’s Master Plan, Open Space and Recreation Plan, Land Use Priorities Committee Report, Town-wide Comprehensive Facility Study, Community Housing Plan, and other planning documents that have received wide scrutiny and input and have been adopted by the Town;</li> </ul>	<p>This study is an implementation of both the 2021 Master Plan and the 2022 HPP (see <b>Project Need</b>, above).</p>
<ul style="list-style-type: none"> <li>•Receive endorsement by other municipal boards, committees, commissions, or departments.</li> </ul>	<p>To be obtained after finalizing scope.</p>
<ul style="list-style-type: none"> <li>•Preserve the essential character of the town as described in the Master Plan;</li> </ul>	<p>Understanding the resources and past land use as documented by the plan will inform today’s planning strategies.</p>
<ul style="list-style-type: none"> <li>•Save resources that would otherwise be threatened and/or serve a currently under-served population;</li> </ul>	<p>The study will bring the Indigenous cultural landscape into the local planning environment.</p>
<ul style="list-style-type: none"> <li>•Either serve more than one CPA purpose (especially in linking open space, recreation, and community housing) or demonstrate why serving multiple needs is not feasible;</li> </ul>	<p>Although this application is not for more than one category, the sensitivity map will be used to inform future design and planning stages (e.g. by incorporating open space thereby preserving fragile resources.)</p>
<ul style="list-style-type: none"> <li>•Demonstrate practicality, feasibility, urgency;</li> </ul>	<p>Archaeological resources are vulnerable to continued natural processes such as erosion as well as intentional ground disturbances. Preservation will rely on the sensitivity map.</p>
<ul style="list-style-type: none"> <li>•Demonstrate that the project can be implemented expeditiously and within budget;</li> </ul>	<p>The phases can be further customized. Phase I begins with a preliminary baseline to be used for focusing subsequent phases.</p>
<ul style="list-style-type: none"> <li>•Preserve or utilize currently owned Town assets.</li> </ul>	<p>Once archaeologically sensitive areas have been identified, these can be preserved during future planning.</p>

<sup>5</sup> Community Preservation Coalition, Text of CPA Legislation, <https://www.communitypreservation.org/text-legislation>.

**Relevance to Category-Specific Criteria**

Relevance to criteria that are specific to the Historic Resources Category is provided in **Table 2**.

**Table 2. Application's Fulfillment of Category Specific Criteria.**

<ul style="list-style-type: none"> <li>•Protect, preserve, enhance, restore, and/or rehabilitate historic, cultural, architectural, or archaeological resources of significance, especially those that are threatened; and in the case of proposals on private property, the proposal and/or proponent meet certain economic criteria as may be required by the Community Preservation Committee;</li> </ul>	<p>Study will provide management recommendations and sensitivity map.</p>
<ul style="list-style-type: none"> <li>•Protect, preserve, enhance, restore and/or rehabilitate Town-owned properties, features or resources of historical significance;</li> </ul>	<p>Study will provide management recommendations and sensitivity map.</p>
<ul style="list-style-type: none"> <li>•Project is within a Sudbury Historic District, on a State or National Historic Register, or eligible for placement on such registers, or on the Sudbury Historic Properties Survey;</li> </ul>	<p>The study will encompass the town and provide guidance on these known or newly identified resources.</p>
<ul style="list-style-type: none"> <li>•Project demonstrates a public benefit;</li> </ul>	<p>The plan addresses resources that have been outside the scope of previous planning documents.</p>
<ul style="list-style-type: none"> <li>•Project demonstrates the ability to provide permanent protection for maintaining the historic resource; and in the case of proposals on private property, the proposal and/or proponent have demonstrated additional protective measures and have met additional criteria, as may be imposed by the Community Preservation Committee, to ensure the continued permanent protection of the historic resource.</li> </ul>	<p>Study will provide management recommendations and sensitivity map, which will be used for any decisions on potential permanent protection.</p>

**Community Support**

Support for this application will be sought from other Town entities. Those for which the sensitivity map and management strategies will be most beneficial will be the Select Board, Planning and Community Development Department, Planning Board, and the Historic Districts Commission.

**Justification for Cost: Examples of CPC Funding for Similar Projects in Other Communities**

Comparable past CPC funding bestowed to other communities is summarized in **Table 3**. Generally, the town-wide surveys range between \$25,000 and \$35,000. Wareham, however, is much less--\$8,000--even though this town encompasses the largest geographical area. While a cursory overview could be accomplished for this amount providing just the existing conditions (i.e., known sites), the additional goals set out by Sudbury’s HPP could not be. For this reason, most comparable as far as geographic size are those of Chatham and Yarmouth. Comparable for the desired end goals is the Groton plan<sup>6</sup>, which includes management and interpretive plans.

<sup>6</sup> Christopher Donta, Mitchell T. Mulholland, Sheila Charles, and Brian Jones, *Community-Wide Archaeological Reconnaissance Survey of Groton, Massachusetts (Public Version)*. Presented to Town Manager Mr. Mark Hadadd, Town of Groton, 2011. Accessed online, September 16, 2022, [https://portal.grotonma.gov/storage/Historical\\_Commission/Archaeology/Archaeology\\_Report\\_2011.pdf](https://portal.grotonma.gov/storage/Historical_Commission/Archaeology/Archaeology_Report_2011.pdf).

**Table 3. Comparison of Sudbury’s Request with Previous CPA-Funded Town-wide Archaeological Reconnaissance Studies.**

Community	Area	Amount*	Approval*	Status*	Scope	ID*	CPA Category*
Sudbury	24.6 mi <sup>2</sup>				Complete a Town-wide Indigenous cultural landscape study to inform future planning and management decisions.... including the following: 1) assess characteristics of Sudbury’s glaciated landscape during precontact period; 2) summarize Native American history with a special focus on years prior to contact; 3) review known archaeological sites and resources that have been identified [i.e. existing conditions or baseline data]; 4) review how Native American peoples used and impacted different character areas within the landscape; 5) assess the types of archaeological resources that might be found there today; and 6) prepare an archaeological sensitivity map for the Town.**		Historic
Acton	20.3 mi <sup>2</sup>	\$35,000	4/9/2007	complete	To fund a community-wide archaeological reconnaissance survey to identify areas in Acton that most likely have archaeological sensitivities pertaining to prehistoric and colonial occupation and activities in order to help achieve more effective protection of archaeological resources.*	3032	Historic
Chatham	24.4 mi <sup>2</sup>	\$25,000	5/8/2006	in progress (per CPC databank)	To conduct a Town-wide archaeological survey, serving as a baseline for developing and identifying potential areas of historical sensitivity.*	3155	Historic
Groton	33.7 mi <sup>2</sup>	\$35,000	5/4/2009	complete	The purpose of this project was to conduct a community-wide reconnaissance level archeological survey to identify the patterns of prehistoric/historic occupation and activity in Groton as well as to determine known and probable locations of archaeological resources associated with past cultures and civilizations. These past cultures and civilizations have deposited remnants of their existence only to be seemingly erased by the forces of nature and it is our hope that Groton students, residents, town planners and researchers will use the results of this project to understand, preserve and protect these irreplaceable resources.***	5650	Historic

Community	Area	Amount*	Approval*	Status*	Scope	ID*	CPA Category*
Kingston	20.5 mi <sup>2</sup>	\$25,000	4/11/2007	complete	To fund a Town-wide archaeological survey.*	3366	Historic
Wareham	46.3 mi <sup>2</sup>	\$8,000	1/1/2005	complete	For a town-wide archaeological survey.*	564	Historic
Yarmouth	28.2 mi <sup>2</sup>	\$26,000	6/22/2020	in progress	Identification of potential archaeological sites in Yarmouth. Products include sensitivity maps with relevant sites and surveyed areas and a written inventory of potential archaeological sites.*	49996	Historic

\*information from <https://www.communitypreservation.org/databank/projectsdatabase>.

\*\* Heritage Strategies LLC, 2022, III-11-12.

\*\*\*Alvin B. Collins Jr., Chairman, Groton Historical Commission, letter dated June 27, 2011, available online at [https://portal.grotonma.gov/storage/Historical\\_Commission/Archaeology/Archaeology\\_Report\\_2011.pdf](https://portal.grotonma.gov/storage/Historical_Commission/Archaeology/Archaeology_Report_2011.pdf)