

Members of the Commission,

I appear in front of you tonight in a slightly different context than I have for the past four plus years. Tonight, I represent not only as a community member but also as a professional archaeologist, historian and anthropologist to correct the record as it regards the project and its relation to historic and archaeological significance.

As part of the City of Cranston's Development Application process, applicants are required to work with a checklist. Items on that list and any items that checklist prompt for additional information are required to be submitted so as to achieve a Certificate of Completeness, the document that fixes the application as vested. We have heard a lot of defense of the concept of vesting from the Applicant over past meetings. That is not my purpose tonight.

Three lines up from the bottom on the Applicant's checklist there is a check box left blank. No other check box on the entire checklist is blank. The check box is labeled, "RIHPC- for potential historic/archaeological significant sites." It is unclear why this particular box was left unchecked or how the checklist's incomplete state may or may not relate to the status of the Certificate of Completeness. This seems like an important question for you to answer, but that is also not my purpose.

I am here to fill in that blank and provide related information for your benefit.

First, I want to be clear that there is no obligation for a private applicant to care about the presence or absence of historical or archaeological sites or suspected sites *other than* to adhere to any and all legal protections of known sites and/or importantly, to cease work and report any evidence that may be discovered during construction.

At the same time, the Applicant does have the obligation to confirm or deny the presence of historical and cultural resources for the purpose of your review.

I respectfully direct your attention to the Comp Plan's ELEMENT 5A: HISTORIC PRESERVATION GOALS, HPG It reads as follows:

“Protect and preserve properties of historic and architectural significance, as well as known and suspected archeological sites, cemeteries, engineering structures and city owned properties.”

CCP, 2010, ELEMENT 5A)

The Comprehensive Plan further states this under ‘Historic Preservation Element/ Key Strategies:’

“Another key issue that must be understood when considering historic preservation is that the definition of historic resources not only incorporates specific buildings and structures, but also districts, cemeteries and landscapes.” (CCP 2010, Sect 5A)

So, how does this relate to your review of this project?

Phased studies of potential project impacts to historical and/or archaeological resources may be triggered by certain conditions, especially the use of Federal Funds in construction. For the Natick site, this requirement was triggered when Tennessee Gas and Providence Gas took over 36 miles of Rhode Islanders’ property by condemnation to build their transmission line. They were required to undertake, at minimal, a Phase I Cultural Resource Survey.

By way of explanation, a Phase I survey is a bird’s eye cultural resources investigation of an area under potential threat. Phase I surveys typically include but are not limited to the review of published and unpublished research, review of collections housed in private and public repositories, the mining of local knowledge in the form of interviews and oral histories and finally, depending on the site or sites, preliminary archaeological investigations. The goal of Phase I surveys is most often to identify new sites and evaluate the risk to them but Phase I projects may also serve to determine if known sites are at risk or may be newly eligible for elevated investigation or other forms of recognition.

Based on the data gathered, Phase I surveys may then be move into additional phases of investigation. These subsequent phases often result in new sites being included in both local and federal historic registers and inventories.

During the Phase I survey of the Tennessee Gas Pipeline, new data were discovered and certain known Cranston sites and areas were elevated to Phase II investigations, including one site and two 'areas' directly abutting the proposed project site.

Prior to the Tennessee Gas investigation, the section running along the full length of the proposed solar project area was already part of a miles-plus stretch of road and structures designated eligible for National Register of Historic Places status due to the pre-and post-revolutionary historic significance of two related farmhouses still in use today. Those two properties, the Thomas Baker Farm and the Henry Baker Farm are both direct abutters to the project. The combined Baker farms once stretched North to Wilbur Ave, South into modern West Warwick, West to Phenix Ave and East all the way to what is now Route 2; together comprising hundreds and hundreds of acres. Natick Ave was once known as Baker Road-because the road ran only south from Wilbur Ave, ending at the Thomas Baker Farm.

Also known of prior to the Phase I survey was the presence of the foundations of a National Historic Register Property known as the 'Potter-Remington House' along with two recorded, historic cemeteries. I note that the Applicant has marked the presence of both those cemeteries on their plans.

Fast forwarding to 1991, the Phase I and Phase II Studies for the Pipeline re-confirmed that the pipeline and its surrounds contain archaeological evidence of pre-contact/ Late Woodland and pre-and post-contact Narragansett<sup>1</sup> activities. For the Natick Ave area, this is specifically related to the abundant waters of the Meshanticut Watershed and other locally available natural resources including steatite for stone vessels and pipes. Additionally, these studies called out the presence of long lengths of running stone walls on the proposed site, including one wall that was anticipated to be impacted by the pipeline. As an example of how these phased studies are applied, this section of wall was referred for mitigation and rebuilding subsequent to pipeline construction.<sup>2</sup>

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<sup>1</sup> 'Meshanicut is Narragansett for "place of woods."'

<sup>2</sup> (I note that while this mitigation action was photographically documented in 1992 as having been completed, the wall has since been removed by the Owner, Tennessee Gas and National Grid, in direct violation of the action and the historic protection of the walls per State law.)

The Phase II survey also specifically addressed the status of the Thomas Baker Farm directly West of the proposed site), raising its status to also include National Register eligibility as a single property. This recommendation was based not only on its “well-preserved representative example of a mid-eighteenth century house, but most importantly, for its “intact historical landscape with broad vistas, open fields, woodlands, and a variety of features such as stonewalls and structural remains.” The report further states, “The farm may also be expected to contain associated subsurface archaeological evidence of past land use.” The report references two cemeteries.

In 1991, the research area included acreage no longer owned by the farm today - acreage that is on the east side of Natick Road, both abutting and part of the proposed project site. While only one of those acres remains part of the Thomas Baker Farm today, the Phase II survey and the eligibility research still applies to those lands, regardless of ownership.

Finally, the Phase II Study specifically calls out Natick Avenue as having been established “as early as 1748” and “not appreciably widened” since. The study noted the protected stone walls that line Natick Ave and made mention of the ledge that is also a part of the road side boundaries. In lay-terms, the road is an example of “engineered structures” as mentioned in the Comprehensive Plan under Historic Preservation Goals mentioned earlier. This status was further codified by the City of Cranston when it designated Natick as a “scenic route” with special set back requirements.

Since the 1991 study, the Baker Farm has been placed into permanent conservation by the Federal Government with the City of Cranston acting as its local agent. This was accomplished in 2012 as part of meeting the Comprehensive Plan Goals for Western Cranston and working within the Future Land Use Map. Cranston Open Space monies were used for the City’s portion of the purchase of the Farm’s development rights. The farm was bought privately in 2014 with the goal of restoring it as a working, historic farm.

Today, the farm has achieved that goal. It is managed as a rare breed fiber farm with a land lease element, a farm stay program that supports eco-tourism and hosts educational opportunities focusing on local agricultural history, land conservation, and the role of wool as a sustainable and renewable farm product.

The farm also maintains and protect one of only two remaining cemeteries of enslaved peoples (both African and Indigenous) left in Cranston today.

The farm is also in its 9<sup>th</sup> year of habitat restoration as recommended by the baseline report that supported its initial conservation. That report's 'existing conditions' data revealed significant opportunity to restore and protect diverse species habitat, an opportunity the owners have embraced and exceeded. This restoration has specifically focused on protecting the agricultural and historical viewsheds recognized for their significance in 1991 and again in 2012 when the farm was conserved.

Now that you understand a little bit more about the historic significance of the context of the proposed site, let's return to the checklist gap. As evidenced tonight, the site is not without "potential" as the checklist's silence on the matter might suggest.

The checklist refers any applicant to the Rhode Island Historic Preservation Commission-the body charged with protecting our historical, archaeological and cultural resources. That is the minimal requirement that must be met. I have confirmed that the RIHPC was not contacted regarding this application.

Certainly, things can be overlooked from time to time and a possible oversight on the part of the Applicant is to be understood but this should not have been ignored by Staff given the significant role the Planning Department has had in the preservation and conservation of the Baker Farm, including their requirement to annually inspect the farm for compliance with its conservation agreement. The City also has an Historic District Commission whose expertise Staff could have brought to bear on this project although I note that according to the City's website, it is currently an almost vacant commission with only one listed member. We also have the Cranston Historical Society. And, of course, there's always the internet.

Given the documented historical significance of the project's cultural context, not to mention the documented potential for archaeological evidence on the site itself I ask that you address the checklist insufficiency and ask for any and all submissions to meet all historical and cultural significance requirements that apply.

## Sources

Adams, Virginia Phase II NRHP Evaluation, Thomas Baker Farm Report 345-3 (1991)

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PAL, RIHPC, Cranston Historical Society, NHRP, others; var pub and pers comm

Private Archives, Moreau Family

Private Archives, Lawrence Family

Private Archives, Patten/Deter Family