November 18, 2021

Adam Turner
Executive Director
Martha’s Vineyard Commission
P.O.Box 1447
Oak Bluffs, MA 02557

Attn: Christina Mankowski

RE: 4 State Road Redevelopment and New Construction, 4 State Road, Assessors Parcel Map 9A Lot 6, Tisbury, MA. MHC# RC.70232. DRI-710.

Dear Mr. Turner:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the archaeological report, *Intensive (locational) Archaeological Survey, 4 State Road Redevelopment and New Construction Project, Tisbury, Massachusetts*, prepared and submitted by the PAL, Inc., for the project referenced above.

The archaeological survey defined the general depths and extent of prior ground modification, including filling and grading, within the project parcel. No intact ancient Native American deposits associated with the Vincent Site (19-DK-21) were identified within the portions of the project impact area subject to archaeological hand testing. However, intact, significant ancient Native American artifacts, archaeological features and deposits may exist underneath filled soils. Therefore, the MHC recommends that the project be modified to include construction only within filled and/or disturbed soils where feasible. Current project plans showing the updated project that includes shallow construction should be submitted to the MHC, and to the PAL for archaeological assessment.

If construction is required below existing filled and/or disturbed soils, then the MHC recommends that supplemental intensive (locational) survey (950 CMR 70), including systematic, machine-assisted soil stripping under the direction of the project archaeologist, be conducted by the PAL within deeper portions of the project impact area, including areas required for any foundation footing excavation, utilities and/or septic system components. The systematic soil stripping should include removal of non-resource bearing overlying fill soils to expose any intact, natural and/or cultural soils that may contain significant artifacts, archaeological features and soils deposits associated with the Vincent Site.

The goal of the supplemental investigation is to ascertain exact horizontal and vertical boundaries, preliminary data contents and internal configuration, and to provide information on the site integrity. The results of the investigation will be used in consultation to avoid, minimize or mitigate adverse effects to significant archaeological resources.
These comments are provided to assist in compliance with Massachusetts General Laws Chapter 9, Sections 26-27C (950 CMR 70-71). If you have questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

Brona Simon
Executive Director
State Historic Preservation Officer
State Archaeologist
Massachusetts Historical Commission

xc: Xerxes Aghassipour
    Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
    Deborah C. Cox, PAL