



## PHILADELPHIA ARCHAEOLOGICAL FORUM

March 7, 2008

Attn.: James N. Boyer  
U.S. Army Corps of Engineers, Philadelphia District  
The Wanamaker Building  
100 Penn Square East  
Philadelphia, PA 19107-3390

Re: Philadelphia Archaeological Forum comments – Phase II archaeological investigations of the SugarHouse Casino property.

Dear Mr. Boyer,

This document presents the Philadelphia Archaeological Forum's (PAF) questions and comments regarding ongoing SugarHouse Casino archaeological investigations, as reported in A.D. Marble's recent Phase II report of findings. The PAF would like to thank you for making this document available for our review, as it presents a much more comprehensive overview of the work thus far completed at this site, more thorough discussions of the findings and interpretations that have been generated by that research, and updated recommendations regarding the need for additional investigation. As such, it affords our organization with a substantially more complete set of information upon which to base our review.

The area of potential effect for the SugarHouse project encompasses an area that offers extraordinary potential to illuminate thousands of years of our history and shared heritage. The stories that may lie hidden beneath the ground on this seemingly unassuming plot of ground can reveal much about locally and national significant themes. The unique and rich history of this site tells us a great deal about pre-contact habitation in the Philadelphia area, early contact and interaction between Native Americans and early Europe settlers, colonial settlement of the area, the development and rise of Philadelphia as a major shipbuilding center and port, and the emergence of the city as a urban metropolis that came to be know as the "workshop of the world".

The PAF is aware of the need to complete Section 106 compliance as expediently as possible. We have no interest in seeing one-more minute expended than is necessary to complete pre-construction archeological work. But it is absolutely vital that not one minute less than necessary be expended to thoroughly survey the site; to do otherwise risks destruction of a heritage that belongs to Philadelphians and, indeed, to all Americans.

### **General Comments:**

From an overall perspective, the PAF believes that archaeological work completed through the conclusion of Phase II investigations has been inadequate to thoroughly evaluate the extent of cultural resource

preservation within the planned SugarHouse Casino site, to identify the full suite of potentially significant resources that might be contained within this property, or to evaluate the eligibility of such resources for listing in the National Register of Historic Places. Moreover, we contend that the inadequacy of current investigations pertains to both specific identified resources as well as to the site as a whole. As such, it is our position that additional, and in some instances potentially extensive reconnaissance-level exploration (i.e., Phase IB/II) is required within the site before proposals for the mitigation of significant archaeological features and deposits (i.e., Phase III data recovery investigations) can be considered. More detailed discussions regarding the need to perform additional archaeological investigations, as related to specific sections of the site, are included below.

In large measure current interpretations of site preservation seem to stem from the position that the planned SugarHouse property has been “massively” impacted by later 19<sup>th</sup> and 20<sup>th</sup> century development. Our organization believes that such an assertion has not yet been conclusively demonstrated, and in fact information thus far generated may contradict this interpretation. While specific locales within the site have no doubt been extensively disturbed, substantial areas have been shown to contain comparatively intact historical foundations, features, and potentially artifact-bearing soil horizons within a few feet of the current ground surface. Near surface archaeological deposits, including former historic ground surfaces, have been truncated across large stretches of the study area; however, we believe that there has been an insufficient amount of geomorphological investigation completed in support of archaeological investigations to allow an accurate or comprehensive evaluation of the full extent of prior disturbance or landform truncation within the site.

### **Resource Specific Comments:**

#### Native American component:

The PAF is pleased to see that efforts have been made to re-examine the findings from this part of the site, and we concur with revised interpretations regarding the significance and National Register eligibility of this important resource. However, there remain a number of concerns related to the Native American site component that need to be addressed, and questions for which we require answers be provided:

- Members of the archaeological team thus far have not relocated or tested the two areas of intact A-horizon identified by the project geomorphologist during Phase IA studies (found in trenches GT-5 and GT-6). Given the extremely high potential for these soils to contain additional Native American (as well as historical) artifact deposits and features, further effort should be expended to determine the exact location and horizontal distribution of these soil horizons, and additional controlled testing should be done to evaluate the archaeological significance of any cultural materials contained within these areas.
- This component has already produced more lithic artifacts than any other similar intact site in the central portions of Philadelphia, and its further study therefore has an excellent chance of substantially increasing current understandings of this region’s Native American populations. Considering this status, we believe the specific mitigation proposal outlined in the Phase II report is not adequate. In particular, we find that the specific proposed methodology – combining limited test unit excavation and the stripping of remaining sections of preserved A-horizon soils to look for features (in other words, removing remaining A-horizon soils without screening for artifacts) – to be an inappropriate approach in this instance. Given the overall small size of the area of the Native American site, and the relative ease with which it can be accessed and examined, we recommend that 100% of this component be investigated and documented via controlled test unit excavation methodologies.

- Figures 27 and 28 in the Phase II report indicate that a total of four brick shaft features (#'s 130-133) were identified *inside* the area of intact A-horizon soils, and *within* the Native American site component. These features were tested via the use of machine-assisted bisection procedures that, according to accompanying photographs, involved the uncontrolled excavation of considerable amounts of soil adjacent to each shaft. Did the testing of these shafts result in the removal of any intact A-horizon soils? If so, were these soils subjected to thorough archaeological examination prior to shaft testing? Were any portions of the Native American site component disturbed or impacted in any way as a result of shaft testing procedures? The placement and arrangement of the series of one meter square test units (see Figure 29) indicates that units were clustered in one area-- the one section where shaft features were not found-- rather than being dispersed throughout the area of intact A-horizon. Was this done because the A-horizon at the southern and western ends of the Native component had been impacted by shaft testing?

#### Penn Street:

As our previous project comments indicated, we believe that the ground beneath Penn Street represents a potentially well-preserved section of the site, and an area that could exhibit a high probability for containing significant archaeological data. Specific evidence that could be sealed beneath this former roadbed include archaeological remains of the Revolutionary War-era British redoubt #1, additional Native American features and/or artifact deposits, resources pertaining to early waterfront development, and stratigraphic information related to the formation of the historical landscape and its subsequent modification by historical occupation.

According to the Phase II report, it is currently proposed that future investigation of this potentially significant corridor through the site should be accomplished by means of archaeological monitoring methodologies. Given the potential importance of this area, the PAF believes that archaeological monitoring represents an insufficiently rigorous approach to employ in this instance. Instead, we recommend that a plan be developed that outlines a deliberate, controlled, and comprehensive methodology designed to identify and document any archaeological deposits and/or features that may be contained below the historic roadbed. Any such plan should also provide for conduct of additional geomorphological examinations as a means of evaluating landform development and impacts caused by historical development and transformation of the local landscape.

#### Area H-2:

According to historical documentation included in the Phase II report, the H-2 section of the project area was occupied by at least the early 19<sup>th</sup> century, and within a few decades thereafter had developed into a thriving residential neighborhood. Archaeological testing within this area has turned up physical evidence of potential residential structures dating to this time period; however, no associated shaft features or related artifact deposits have been identified. While near surface horizons in this area appear to have been truncated to some extent by later railroad construction, the full extent of this truncation has not been firmly established. As such, the absence of shaft and related features, and associated artifact deposits, has not been verified. If 18<sup>th</sup> and/or early 19<sup>th</sup> century foundations are preserved in this portion of the study area, it then stands to reason that at least truncated portions of shaft features associated with these structures should also survive. Given this situation, the PAF believes that current testing levels have been insufficient to enable accurate evaluation regarding the National Register eligibility of resources in this area.

Prior testing in section H-2 primarily involved the use of test trench excavations to identify archaeological resources, and has thus far resulted in the direct examination of only very limited sections of this larger

area. We believe that more expansive testing, coupled with additional geomorphological work, will be required to adequately identify the full range of resources that may be contained in this area, and to permit accurate assessments of potential resource eligibility. Considering that this area could contain a wide assortment of resources, including materials associated with prior Native American occupation (possibly associated with the late 17<sup>th</sup> century Lenape village of Shackamaxon), 18<sup>th</sup> and 19<sup>th</sup> residential properties, and features associated with British Redoubt #1, we recommend that: 1) the boundaries of area H-2 be extended to the southeast margins of Delaware Avenue; and 2) that the entire area bounded by Laurel, Delaware, Shackamaxon, and Penn Streets be stripped of overlying fill materials and thoroughly examined for potentially significant artifact deposits. While this represents a comparatively large portion of the entire SugarHouse property, prior testing has determined that intact archaeological materials are generally encountered within approximately two (2) feet of the present ground surface. As such this area, like the adjacent H-1 segment, is readily amenable to this sort of large scale stripping effort.

#### British Redoubt #1:

All parties to this project are in agreement that this fortification represents an extremely important historical and archaeological resource. At present, the precise location of this fort within the study area is not known (though its general location seems to have been established), and testing to identify any surviving remnants of its outer trenches has been comparatively limited. The PAF believes that more expansive archaeological testing will be required in order to determine whether or not any traces of the fort or associated features might be preserved within this property, and it is our opinion that such testing should be afforded the widest latitude possible. We also maintain that any arguments suggesting that all traces of the fort have likely been destroyed by prior historic development/landform truncation have not been sufficiently supported or confirmed by existing field data. While later alteration to the site may have removed all or substantially all of the above ground and near surface portions of the fort, testing to date has not established that significant portions of the exterior moat or ditch may not survive. The location of the lower portion of the moat might serve to delineate the exact location of the fort, could perhaps serve as a benchmark useful in locating other, more ephemeral, features relating to the fortifications, and might contain trash deposits associated with the occupation of the fort.

Additional reconnaissance-level archaeological explorations discussed above for Penn Street and Area H-2 are believed likely to encompass much of the area believed to have been once occupied by the fort, and would be likely to reveal any remaining archaeological traces of that structure, including portions of the exterior trench or moat, and any more extensive interior features, such as a privy. Based on information generated by the testing of Penn Street and adjacent portions of Area H-2, the exploration of previously untested areas to the east of Penn Street may also be warranted. Geomorphological evaluations of sub-surface soils in the approximate location of the fort should also be conducted, and may provide critical interpretive data in the event that no physical evidence of the fortifications is identified.

#### Waterfront Resources

Based on information provided in the Phase II report and discussed during the recent field view meeting, it is our opinion that field testing in critical areas at or near the margins of the historic waterfront (areas H-3 and H-4; east of Penn Street) did not extend deep enough to discount the possibility of significant archeological resources being preserved below later fill or demolition layers. A careful reading of available site data suggests that the trenching conducted in these two areas was not extended to a depth sufficient to penetrate below later fill and demolition layers to where deposits and features related to early wharf and shipbuilding activities might be encountered. Our experience is that such potentially important resources are likely to be encountered in undisturbed sediments or early fill layer near or just below river level. None of the trenches completed in these areas reached undisturbed riverine sediments. It is our

opinion that the existing test trenches should be re-excavated and extended to a depth sufficient to verify the presence/absence of potential early historical waterfront resources.

Beach St. Power Plant / Pennsylvania Sugar Refinery Complex

Both the reports of Phase IB and Phase II archaeological investigation state as a matter of fact that the construction of these industrial complexes completely destroyed any evidence of earlier occupation; however, to date no documented evidence, of either an archaeological or historical nature, has been presented to support this conclusion. In the absence of such confirmatory data, the PAF recommends that additional reconnaissance-level archaeological testing be performed within the footprints of both industrial complexes. In the case of the Beach Street Power Plant, further exploration should seek to document the vertical extent of disturbance resulting from the construction of the plant, as well as the truncated remains of any shaft features that may be sealed beneath its foundations. If such shafts are present, they could contain significant further information pertaining to the early residential occupation of this area during the 18<sup>th</sup> and 19<sup>th</sup> centuries.

For the Pennsylvania Sugar Refinery, archaeological resources sealed beneath that complex could relate to the early development of the local waterfront and the industries that grew up alongside it. Although previous testing in this vicinity (Trench 16) encountered only unconsolidated demolition debris to a depth of approximately 9 feet below the present ground surface, the PAF believes that these trenching efforts may not have extended deep enough to demonstrate the extent of disturbance caused by the construction of the complex, or to document that all traces of earlier archaeological resources have been completely disturbed. Future explorations of this complex should proceed to a point at which undisturbed, and presumably culturally sterile river bottom soils are encountered, and if necessary should provide for the use of de-watering technologies as a means of controlling potential infiltration from the river.

On behalf of the Philadelphia Archaeological Forum I once again thank you for providing us with the opportunity to present our views concerning this project. If you have any questions regarding these comment or the recommendations we have made, please do not hesitate to contact me directly. Our members look forward to reviewing the Phase II report once it has been finalized, as well as the future Phase III workplan, and to continuing to work with the U.S. Army Corps on this important project.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Douglas Mooney', with a long, sweeping vertical stroke extending downwards from the end of the signature.

Douglas Mooney  
President  
Philadelphia Archaeological Forum

Cc: PAF archives