

June 22, 2022

Mr. John Burt
Town Manager
45 Fort Hill Rd.
Groton, CT 06340
(sent only via email to jburt@groton-ct.gov)

Subject: Mystic Oral School Property Development
Oral School Road
Groton, Connecticut

Dear Mr. Burt,

The State Historic Preservation Office (SHPO) was contacted regarding the proposed development of the referenced property. Although this office does not have a formal role in the project, we submit this letter as an advisory opinion. These comments are intended to facilitate development by offering technical guidance that can be taken into consideration by the project proponent, explaining the regulatory responsibilities of SHPO, and presenting funding opportunities for rehabilitation of the property. The Mystic Oral School contains several prominent buildings constructed during the use of the property beginning in the late nineteenth century and continuing through the twentieth century. The school was at the forefront of deaf education by teaching deaf students how to speak and lip read. This approach was in stark contrast to the sign language being taught at the American School for the Deaf in West Hartford. Connecticut was at the heart of a debate that continues to this day in the deaf community. In addition to its striking architecture, the Mystic Oral School is a significant historic property for the role it played in deaf culture and it is listed on the State Register of Historic Places.

In addition to the built environment, the landscape encompassing the Mystic Oral School is considered archaeologically sensitive. The environmental characteristics of this parcel frequently are associated with pre-contact or Native American habitation and land use. Although the property has never been subjected to a formal archaeological survey, research suggest that this location may have been a strategic location during the Pequot War and early European settlement. Archaeological sites are our most vulnerable cultural resource because they are not readily visible and they cannot be recreated once they are lost. Therefore, SHPO strongly encourages a comprehensive archaeological survey of the property if ground disturbing activities are proposed because of its potential association with significant archaeological deposits.

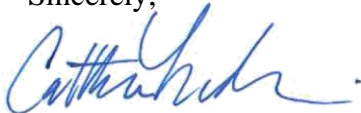
Although SHPO's role is only advisory at this time, this office would like to point out that any project using state or federal funds or that would require state or federal permitting or approvals could be subject to a regulatory review from our office pursuant to the provision of the National Historic Preservation Act or the Connecticut Environmental Policy Act. In either case, SHPO would request an archaeological survey as part of a standard due diligence compliance requirement. It is SHPO's opinion that any project proponent should be aware of this potential.

Although SHPO is not familiar with any specific plans, our office strongly encourages any development to embrace the unique historic character of this property. In this regard, SHPO would like to point out that rehabilitation of existing structures is not only environmentally friendly, but is a powerful economic revitalization tool. As the World Bank reported in the Urban Development Series titled the *Economics of Uniqueness*, “heritage is a differentiator that attracts talent.” In other words, those municipalities that invest in historic assets also provide an enabling environment appealing to workforce creation. People are drawn to old places to experience the unique beauty, inspirational awe, or nostalgic feel. These places spur our imagination and retain a sense of distinctiveness that does not exist in modern building forms.

Our office has worked with hundreds of developers providing technical assistance, as well as grants and tax credits to successfully support the rehabilitation of similar types of properties. We would like to highlight some programs managed by SHPO that could provide financial assistance to help any project proponent identify the best opportunities for redevelopment. To assist with feasibility studies, conditions assessments, or other development soft costs; SHPO has Survey and Planning grants that could be used to engage the services of a historic preservation professional, architect, or structural engineer. For example, this grant program could be used to hire a consultant to prepare a nomination for listing the property on the National Register of Historic Places or develop bid-level architectural drawings and specifications for the rehabilitation of the structures. These necessary steps would prepare any redevelopment project for the state and federal historic rehabilitation tax credit programs. These programs can be combined to defray up to 50% of eligible costs for the rehabilitation of the site, which equates to millions of dollars.

We hope that this letter has provided the town of Groton with valuable information. This office appreciates the opportunity to provide these comments and we hope to assist with the redevelopment of this important piece of local, state, and national history. To that end, SHPO is here to help and we welcome the opportunity to discuss in detail any, or all, of the tools described above. For additional information, please contact me at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Catherine Labadia".

Catherine Labadia
Deputy State Historic Preservation Officer

cc (via email): Goodrich, Groton HDC
 Lehman, DECD
 Somers, CGA Senate
 Vairo, Preservation CT