



July 25, 2019

Mr. A. Peter Mair
Public Archaeology Laboratory, Inc.
26 Main Street
Pawtucket, RI 02860

Subject: North Stonington Solar Project – Cultural Resources Assessment Report
Providence-New London Turnpike
North Stonington, Connecticut

Dear Mr. Mair:

The State Historic Preservation Office (SHPO) has reviewed the potential effects of the referenced project on historic properties. SHPO understands that the proposed project plan consists of constructing a ground mounted solar array facility with associated improvements. The project parcel covers approximately 124 acres on the south side of the Providence-New London Turnpike with additional access from Cranberry Bog Road to the west and Boom Bridge Road to the east. The proposed project will require a Stormwater Discharge permit issued by the Department of Energy and Economic Protection through the delegated authority of the United States Department of Environmental Protection and approval by the Connecticut Siting Council. Therefore, the proposed activities are subject to review by this office pursuant to both Section 106 of the National Historic Preservation Act and the Connecticut Environmental Policy Act (CEPA).

SHPO appreciates the well-researched and written project assessment. As noted in your submission, although no archaeological sites or properties are listed on the National Register of Historic Places (NRHP) have been recorded within the project parcel, the area has never been subjected to a formal cultural resources survey. SHPO concurs with the assessment report that the identified dam is a common design that is not eligible for listing on the NRHP. During the assessment survey, the historic Allen Cemetery also was identified and documented. We understand that there are no planned impacts to this cemetery or its immediate vicinity. However, as noted in the assessment report, it is not uncommon for graves to exist outside of the boundary walls of cemeteries of this age. SHPO concurs with the 30 meter buffer and recommends that it is indicated on the ground to prevent construction related impacts and that the cemetery with buffer be marked as a sensitive resource area on construction maps. With these precautions taken into consideration, it is our opinion that no additional recordation of the cemetery is required. If, however, these conditions cannot be met, our office requests additional consultation regarding the potential need for additional surveys or monitoring.

State Historic Preservation Office

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Based on the known historic resources in the vicinity and the environmental characteristics of the project parcel, SHPO concurs that intact and well-drained soils within the project area have an elevated potential to contain significant archaeological resources. We are therefore requesting that a professional archaeological reconnaissance survey be completed prior to construction of those areas identified as having a moderate or high potential for containing intact archaeological deposits, totaling approximately 54 to 57 acres. This office recognizes that portions of the project area have been subjected to significant previous ground disturbing activities and no additional recordation of these areas or other locations characterized as having a low potential for containing significant archaeological sites is warranted. Subsurface testing should be in compliance with our *Environmental Review Primer for Connecticut's Archaeological Resources* and no construction or other project-related ground disturbance should be initiated until SHPO has had an opportunity to review and comment upon the requested survey.

This office appreciates your cooperation and we look forward to continuing consultation. 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 "C. Labadia".

Catherine Labadia
Deputy State Historic Preservation Officer