

Lee D. Hoffman

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October 8, 2020

VIA ELECTRONIC FILING

Melanie Bachman, Executive Director/Staff Attorney Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Docket 492 - Gravel Pit Solar – Application for Certificate of Environmental Compatibility and Public Need to The Connecticut Siting Council Regarding a Solar Project in East Windsor, Connecticut

Dear Ms. Bachman:

I am writing on behalf of my client, Gravel Pit Solar ("GPS") in connection with the above-referenced Docket. This letter will serve to inform the Siting Council that on September 11, 2020, GPS submitted a Phase IB Archaeological and Architectural Survey of the Proposed Gravel Pit Solar Project in East Windsor, Connecticut to the Connecticut State Historic Preservation Office ("SHPO"). The Phase IB survey that was sent to SHPO is too large to send via electronic mail, however, a copy of that filing and the cover letter that accompanied it may be accessed by going to the following address: https://www.dropbox.com/home/GPS%20SHPO.

Should you have any difficulties access that information, or if there are any questions concerning this submittal, please contact me directly. I certify that a copy of this submittal has been submitted to the parties listed on the service list for this Docket.

Sincerely,

Lee D. Hoffman



September 11, 2020

Ms. Marena Wisniewski
Department of Economic and Community Development
State Historic Preservation Office
450 Columbus Boulevard, Suite 5
Hartford, Connecticut 06103

RE: Phase IB Archaeological and Architectural Survey of the Proposed Gravel Pit Solar Project in East Windsor, Connecticut

Ms. Wisniewski:

Heritage Consultants, LLC (Heritage) has completed a Phase IB Archaeological and Architectural Survey (Phase 1B Survey) of the area encompassing the proposed Gravel Pit Solar Project (Project) in East Windsor, Connecticut. This work was completed on behalf of Vanasse Hangen Brustlin, Inc. (VHB) and Gravel Pit Solar, LLC; Gravel Pit Solar II, LLC; Gravel Pit Solar III, LLC; and Gravel Pit Solar IV, LLC (collectively, Gravel Pit Solar [GPS]). The Phase IB Survey effort was completed in July and August of 2020 and included both an archaeological survey of the moderate archaeological sensitivity areas previously identified by Heritage during a Phase IA Cultural Resources Assessment Survey of the Project Site, as well as photodocumentation and National Register of Historic Places (NHRP) assessment of historic buildings located within and immediately adjacent to the Project Area.

As you will note in the enclosed report, four archaeological loci were identified, delineated, and documented during the Phase IB Survey. They were designated as Locus 2-1, Locus PSA-7-1, Locus PSA-7-2, and Locus PSA-10-1. All four loci yielded only a single prehistoric artifact, and Locus PSA-7-2 also produced one historic period artifact from the ground surface. None of the archaeological loci contained buried cultural features and all of them lacked substantial numbers of artifacts and research potential. These four loci were assessed as not eligible for listing to the NRHP applying the criteria for evaluation (36 CFR 60.4 [a-d]), and Heritage recommended no additional archaeological examination of them prior to construction of the Project.

Heritage personnel also noted the presence of 45 buildings within and immediately adjacent to the disturbance areas associated with the proposed Project. These buildings included three historic residences, 31 tobacco sheds, English style barns, ancillary farm buildings, a standing water tower, and a dilapidated water tower. The historic structures recorded during the Phase 1B Survey are collectively part of the Markowski Farm and some of them retain a high level of integrity, are of importance to the historic agricultural landscape, and can be considered dwindling types of resources. Given its size, age, and cohesiveness, it is the opinion of Heritage that the Markowski Farm (and its contributing elements) may be eligible for listing in the NRHP.

GPS and VHB recognize the sensitivity and importance of the standing structures on the Markowski Farm and have made a number of modifications to the design of the original Project development area to reduce potential impacts to the farm complex. GPS has determined that the collection lines, including the

ones crossing Plantation Road, will be buried to minimize visual impacts to the Markowski Farm area. GPS also plans to install vegetation screening at various locations across the Project Site to minimize visual impacts, as well as erect an agricultural type fence and enhanced access road entry points around the Project Area. The use of the agricultural fence will be in keeping with typical farm fences of the region and will serve to maintain the rural agrarian character of the area to the extent possible. The enhanced access road entry points will integrate the Project access roads into the surrounding area with vegetation screening and wooden entry gates. Finally, in addition to eliminating direct construction impacts to buildings at the core of the Markowski Farm (including the standing water tower, two commercial buildings, and a barn that has been converted to a workers' dormitory), GPS has redesigned Project plans to avoid direct impacts to six tobacco sheds along the south side of Plantation Road. These six buildings are referred to as Tobacco Sheds 1 through 6 in the enclosed report.

GPS, VHB, and Heritage look forward to working cooperatively with the CT-SHPO on this important development project. Please do not hesitate to contact me at 860-299-6328 or at dgeorge@heritage-consultants.com with any questions you may have. As always, thank you for your time and consideration.

David George, M.A., R.P.A.

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Co-Principal Investigator Heritage Consultants, LLC