



November 6, 2020

Mr. David R. George
Heritage Consultants
PO Box 310249
Newington, CT 06131

Subject: Phase IB Cultural Resources Reconnaissance Survey
Proposed Gravel Pit Solar
Apothecaries Hall Road et al
East Windsor, Connecticut
ENV-20-0698

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the archeological survey report prepared by Heritage Consultants, LLC (Heritage), dated September 2020. The proposed activities are under the jurisdiction of the Connecticut Siting Council and are subject to review by this office pursuant to the Connecticut Environmental Policy Act (CEPA). The proposed undertaking includes the construction of a 120-megawatt, alternating current, ground-mounted solar facility, which is to occupy an approximately 517 acre project site within a larger 726 acre area, located within 8 parcels adjacent to Apothecaries Hall Road, Plantation Road, Wapping Road, and Windsorville Road. Surrounding land uses include housing developments, agricultural fields, a utility transmission corridor, railroad line, wooded areas, and a golf course. The submitted report is well-written, comprehensive, and meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

Phase IB of the reconnaissance survey consisted of subsurface testing of areas deemed to have moderate to high archaeological sensitivity during Phase IA, and that would be subject to ground disturbing impacts as part of the proposed undertaking. A total of 389 of 474 planned shovel tests were excavated successfully throughout the proposed work area. The reconnaissance survey resulted in the identification of four cultural resource loci: Locus 2-1, Locus PSA-7-1, Locus PSA-7-2, and Locus PSA-10-1. Each loci yielded a single, nontemporal diagnostic artifact; no cultural features or soil anomalies were identified in the project area. As a result of the information submitted, SHPO concurs with the findings of the report that additional archeological investigations of the project area are not warranted.

The Phase IA assessment survey also identified 41 historic period structures within and immediately adjacent to the project site, including tobacco sheds, English-style barns, residential structures, a water tower, and other ancillary structures. The Phase IB further evaluated these structures, with a recommendation that the site, known collectively as Markowski Farm, is

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eligible for listing on the National Register of Historic Places applying the criteria for evaluation (36 CFR 60.4 [a-d]), under Criterion A in the area of Agriculture for its association with the production of shade tobacco, and under Criterion C in the area of Architecture as exhibiting examples of “utilitarian agricultural buildings, purpose built for the drying and curing of shade grown and broadleaf tobacco,” and which retain moderate to high degree of integrity. Following a site visit by SHPO staff, this office concurs that the property is eligible for listing under Criteria A and C.

As the current project proposal entails demolition of at least 22 contributing structures, the undertaking would adversely impact the historic resource. In order to resolve this adverse impact, our office would like to continue consultation to discuss minimization measures and mitigation options. SHPO acknowledges and appreciates the initial minimization efforts offered by the project sponsor, including screening efforts and retention of sheds along Plantation Road, and looks forward to a successful resolution for all parties.

This office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act. For additional information, please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive style with a long, sweeping underline.

Jonathan Kinney
Deputy State Historic Preservation Officer

cc. (via email): Melanie Bachman, Executive Director, Connecticut Siting Council