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April 10, 2013

VIA HAND DELIVERY

Ms. Linda Roberts
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition 1056: Petition of GRE 314 East Lyme, LLC for a Declaratory Ruling for the Location, Construction, and Operation of a 5 MW Solar Photovoltaic Renewable Energy Generating Project on Grassy Hill Road and Walnut Hill Road in East Lyme, Connecticut

Dear Ms. Roberts:

On behalf of the petitioner, GRE 314 East Lyme, LLC, enclosed is an original and fifteen (15) copies of a report recommended by Dr. Daniel Forrest of the State Historic Preservation Office ("SHPO"). The report, entitled "Phase IA Cultural Resources Assessment Survey of a Proposed Solar Field off Walnut Hill Road in East Lyme, Connecticut," was prepared by Heritage Consultants, LLC and conforms to SHPO's requested standards. The report is included here as Attachment 1. The report is a result of Dr. Forrest's recommendation in a March 13, 2013 letter (included here as Attachment 2). I have also included our initial letter to Dr. Forrest, dated February 25, 2013, requesting an archeological review (included here as Attachment 3).

Should you have any questions concerning this submittal, please contact me at your convenience. Thank you in advance for your assistance.

Respectfully submitted,

Lee D. Hoffman

Lee D. Hoffman

ACTIVE/74725.7/KSHEATHELM/4092377v1

ATTACHMENT 1

PULLMAN
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April 10, 2013

Dr. Daniel Forrest
State Historic Preservation Office
One Constitution Plaza
Hartford, CT 06103

Re: Phase IA Cultural Resources Assessment Survey of a Proposed Solar Field off Walnut Hill Road in East Lyme, Connecticut

Dear Dr. Forrest:

In your March 6, 2013 letter you recommended that our client, GRE 314 East Lyme, LLC, conduct a supplementary archaeological reconnaissance survey in regard to the proposed Antares Solar Field for potential impacts to archaeological resources. You also requested that your office be provided the opportunity to review and comment on the completed survey. GRE 314 East Lyme, LLC has engaged Heritage Consultants, LLC to perform this task and their resultant report is attached hereto. Per your request, the report adheres to SHPO's *Environmental Review Primer for Connecticut's Archaeological Resources.*

Please do not hesitate to contact me if you have any questions about this report.

Sincerely

Lee D. Hoffman

Lee D. Hoffman

ACTIVE/74725.7/KSHEATHELM/4092269v1

APRIL 2013

PHASE IA CULTURAL RESOURCES ASSESSMENT SURVEY OF A PROPOSED SOLAR FIELD OFF WALNUT HILL ROAD IN EAST LYME, CONNECTICUT

PREPARED FOR:

GREENSKIES RENEWABLE ENERGY LLC
10 MAIN ST., SUITE E
MIDDLETOWN, CT 06457

HERITAGE CONSULTANTS, LLC
877 MAIN STREET
NEWINGTON, CONNECTICUT 06111

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1.0 Introduction

This report summarizes the results of a Phase IA Cultural Resources Assessment Survey of a proposed Solar Field off Walnut Hill Road in East Lyme, Connecticut (Figure 1). The subject property measures approximately 10 ha (24 ac) (Figure 2). Heritage Consultants, LLC, completed the field investigation portion of this project, performed on behalf of Greenskies Renewable Energy on March 22, 2013. All work was conducted in accordance with the National Historic Preservation Act of 1966, as amended; the National Environmental Policy Act of 1969, as amended; and the *Environmental Review Primer for Connecticut's Archaeological Resources* (Poirier 1987). The remainder of this document presents a description of the Area of Potential Effect, information used as project context, the methods by which the current Phase I cultural resources reconnaissance survey was completed, results of the investigation, and management recommendations for the project.

2.0 Project Description

As mentioned above, the proposed solar field will be located in East Lyme, Connecticut, specifically on Pigeon Hill near the intersection of Walnut Hill and Grassy Hill Roads (Figure 1). The Area of Potential Effect is situated at an approximate elevation that ranges from 61 to 104 m (200 to 340 ft) NGVD; it is roughly bounded to the north by a proposed housing subdivision, to the east and south by forested parcels of land, and to the west by existing residential developments (Figure 2). The Area of Potential Effect consists of approximately 10 ha (24 ac). The planned construction consists of nearly 800 solar panels mounted on a single post (Figure 2). At the time of survey, the proposed project area was characterized by a mixture of forested land and open fields. The details of the background research and field methods, as well as the results of this field effort, are reviewed below.

3.0 Methods

The current Phase IA cultural resources assessment survey consisted of the completion of the following tasks: 1) a study of the area's prehistory, history, and natural setting (e.g., soils, ecology, hydrology, etc.); 2) a literature search to determine whether or not a cultural resources survey has been completed on the property and to determine whether or not archaeological resources have been noted within or immediately adjacent to the Area of Potential Effect; 3) a review of historic maps an aerial imagery depicting the proposed project parcel in order to identify potential historic resources and/or area of past disturbance; 4) pedestrian survey and photo-documentation of the proposed project parcel in order to determine the archeological sensitivity of the Area of Potential Effect; and 5) preparation of the current archeological assessment report.

4.0 Project Context: Previous Investigations, Natural & Prehistoric Settings, and Historic Overview

The following sections provide an overview of the region's natural and prehistoric settings, historic backdrop, and previous cultural resources investigations completed within the vicinity of the Area of Potential Effect. These brief discussions are included in an effort to provide contextual information relative to the location of the Area of Potential Effect, its natural characteristics, and its prehistoric and historic use and occupation. This section concludes with an overview of the previous cultural resources investigations that have taken place in the area and a discussion of their results.

4.1 Natural Setting

The Area of Potential Effect lies within the seaboard lowland portion of the New England Physiographic Province. It is situated between the Connecticut and Thames Rivers. The topography of the project region is gently sloping to the south, with numerous woodlands, pastures, rivers, small lakes, and wetlands present. This region is characterized by substantial amounts of glacial till situated atop bedrock. Surficial deposits located within the vicinity of the Area of Potential Effect consist of stratified deposits of silty sandy gravel and well-sorted silts. Vegetation within the immediate vicinity of the Area of Potential

Effect consists of manicured lawns; however, regionally represented flora included deciduous forests, saltwater cordgrass, and tall reeds. Finally, local fauna include oyster, soft shell clam, brown trout, American eel, cunner, winter flounder, striped bass, rabbit, raccoon, deer, and a wide variety of terrestrial and aquatic bird species.

4.2 Prehistory of Connecticut

The earliest inhabitants of Connecticut, referred to as Paleo-Indians, probably arrived in the area after ca. 14,000 B.P. (Gramly and Funk 1990; Snow 1980). While there have been numerous finds of Paleo-Indian projectile points throughout Connecticut, only two sites, the Templeton Site (6-LF-21) and the Hidden Creek Site (72-163), have been studied in detail (Jones 1997; Moeller 1980). The Templeton Site (6-LF-21) is located in Washington, Connecticut on a terrace overlooking the Shepaug River. Carbon samples recovered during excavation of the site area produced a radiocarbon date of 10,190±300 B.P., for the occupation. In addition to a single large and two small fluted points, the Templeton Site produced gravers, drills, core fragments, scrapers, and channel flakes, indicating that the full range of lithic reduction took place within the site area (Moeller 1980). Moreover, use of both exotic and local raw materials was documented in the recovered lithic assemblage, suggesting that not only did the site's occupants spend some time in the area, but they also had access to distant lithic sources.

The only other Paleo-Indian site studied in detail is the Hidden Creek Site (72-163) (Jones 1997). Paleo-Indian artifacts recovered from this site include bifaces, side scrapers, a fluted preform, gravers, and end scrapers. While no direct date for the Paleo-Indian assemblage yet has been obtained, Jones (1997:76) argues that based on typological considerations the artifacts likely date from ca., 10,000 to 9,500 years ago. Further, based on the types and number of tools present, Jones (1997:77) has hypothesized that the Hidden Creek Site represents a short-term occupation. Excavation of both sites suggest that the Paleo-Indian settlement pattern consisted of a high degree of mobility, with groups moving regionally in search of seasonal food resources, as well as for high quality lithic materials.

The Archaic Period began by ca., 10,000 B.P. (Ritchie and Funk 1973; Snow 1980). Later, Griffin (1967) and Snow (1980) divided the Archaic Period into three subperiods: the Early Archaic (10,000 to 8,000 B.P.), Middle Archaic (8,000 to 6,000 B.P.), and Late Archaic (6,000 to 3,400 B.P.). To date, very few Early Archaic sites have been identified in southern New England. Like Paleo-Indian sites, Early Archaic sites tend to be very small and produce few artifacts, most of which are not diagnostic. Sites of this age are identified based on the recovery of a series of ill-defined bifurcate-based projectile points. These projectile points are identified by their characteristic bifurcated base, and they generally are made from high quality lithics, though some quartz and quartzite specimens have been recovered. Current archeological evidence suggests that Early Archaic groups became more focused on locally available and smaller game species. Occupations of this time period are represented by camps that were moved periodically to take advantage of seasonal resources (McBride 1984).

By the onset of the Middle Archaic Period, increased numbers and types of sites are noted in the region (McBride 1984). The most well known Middle Archaic site in New England is the Neville Site (Dincauze 1976). Analysis of the Neville Site indicated that the Middle Archaic occupation dated from between ca., 7,700 and 6,000 years ago. These sites are associated with the recovery of Neville, Stark, and Merrimac projectile points. McBride (1984) noted that Middle Archaic sites in the lower Connecticut River Valley tend to be represented by moderate density artifact scatters representing a "diversity of site types, with both large-scale occupations and small special purpose present" (McBride 1984:96). Thus, based on the available archeological evidence, the Middle Archaic Period is characterized by continued increases in diversification of resources exploited, as well as by sophisticated changes in the settlement pattern to include different site types, including both base camps and task-specific sites (McBride 1984:96).

The Late Archaic Period in southern New England is divided into two major cultural traditions: the Laurentian and Narrow-Stemmed Traditions (Funk 1976 McBride 1984; Ritchie 1969a and b). Laurentian artifacts include ground stone axes, adzes, gouges, ulus (semi-lunar knives), pestles, atlatl weights and scrapers. The diagnostic projectile point forms of this time period include the Brewerton Eared-Notched, Brewerton Eared and Brewerton Side-Notched varieties (McBride 1984; Ritchie 1969a). Current archeological evidence suggests that Laurentian populations consisted of groups of mobile hunter-gatherers. While a few large Laurentian Tradition occupations have been identified and studied, they generally encompass less than 500 m^2 in area. These base camps reflect frequent movements by small groups of people in search of seasonally abundant resources. The overall settlement pattern of the Laurentian Tradition was dispersed in nature, with base camps located in a wide range of microenvironments, including riverine as well as upland zones (McBride 1984:252).

The latter portion of the Late Archaic is represented the Narrow-Stemmed Tradition. It is recognized by the presence of quartz and quartzite narrow stemmed projectile points, triangular quartz Squibnocket projectile points, and a bipolar lithic reduction strategy (McBride 1984). In general, the Narrow-Stemmed Tradition corresponds to when Late Archaic populations in southern New England began to "settle into" well-defined territories. Further, Narrow-Stemmed Tradition settlement patterns are marked by an increase in the types of sites utilized. That is, the Narrow-Stemmed Tradition witnessed the introduction of large base camps supported by small task-specific sites and temporary camps. The increased number of Narrow Stemmed Traditions temporary and task specific sites indicates frequent movements out of and back into base camps for the purpose of resource procurement; however, the base camps were relocated seasonally to position groups near frequently used, but dispersed, resources (McBride 1984:262).

The Terminal Archaic, which lasted from ca., 3,700 to 2,700 B.P., is represented by the Susquehanna Tradition (McBride 1984; Ritchie 1969b). The Susquehanna Tradition is based on the classification of several Broadspear projectile point types and associated artifacts. Temporally diagnostic projectile points of this tradition include the Snook Kill, Susquehanna Broad, Mansion Inn, and Orient Fishtail types (Lavin 1984; McBride 1984; Pfeiffer 1984). In addition, the material culture of the Terminal Archaic includes soapstone vessels, chipped and ground stone adzes, atlatl weights, drills, net sinkers, plummets and gorgets (Lavin 1984; McBride 1984; Ritchie 1969a and 1969b; Snow 1980). Susquehanna Tradition settlement patterns are centered around large base camps located in on terrace edges overlooking floodplains. Acting as support facilities for the large Terminal Archaic base camps were numerous task specific sites and temporary camps. Such sites were used as extraction points for the procurement of resources not found in the immediate vicinity of the base camps, and they generally were located adjacent to upland streams and wetlands (McBride 1984:282). Finally, there also are a large number of Terminal Archaic cremation cemeteries with burials that have produced broadspear points and radiocarbon dates between 3,700 and 2,700 B.P. (Pfeiffer 1990). Among the grave goods are ritually "killed" (intentionally broken) steatite vessels, as well as ground stone and flaked stone tools (Snow 1980:240); however, this represents an important continuation of traditions from the Late Archaic and it should not be regarded as a cultural trait unique to the Susquehanna Tradition (Snow 1980:244).

Traditionally, the advent of the Woodland Period in southern New England has been associated with the introduction of pottery (Ritchie 1969a; McBride 1984). Like the Archaic Period, the Woodland Period has been commonly divided into three subperiods: Early, Middle, and Late Woodland. The Early Woodland period of the northeastern United States dates from ca., 2,700 to 2,000 B.P. In his study of the lower Connecticut River Valley, McBride (1984) described Early Woodland sites as "characterized by a quartz cobble lithic industry, narrow-stemmed points, an occasional Meadowood projectile point, thick, cord-marked ceramics, and perhaps human cremations" (McBride and Soulsby 1989:50). Early Woodland sites tend to be located in a variety of different ecozones; however, the largest settlements associated with this period were focused on floodplain, terrace, and lacustrine environments (McBride 1984:300), suggesting "population aggregations along major rivers, interior lakes, and wetlands" (McBride and Soulsby

1989:50). In sum, archeological evidence indicates that Early Woodland populations consisted of mobile hunter/gatherers that moved seasonally throughout a diversity of environmental zones in search of available plant and animal resources.

The Middle Woodland Period of southern New England prehistory is marked by an increase in the number of ceramic types and forms utilized (Lizee 1994a), as well as an increase in the amount of exotic lithic raw material used in stone tool manufacture (McBride 1984). In Connecticut, the Middle Woodland Period is represented archeologically by the use of narrow stemmed and Jack's Reef projectile points; increased amounts of exotic raw materials in recovered lithic assemblages, including chert, argillite, jasper, and hornfels; and conoidal ceramic vessels decorated with dentate stamping. Ceramic types indicative of the Middle Woodland period include Linear Dentate, Rocker Dentate, Windsor Cord Marked, Windsor Brushed, Windsor Plain, and Hollister Stamped (Lizee 1994a: 200). In terms of settlement patterns, the Middle Woodland period is characterized by the occupation of village sites by large co-residential groups. These sites were the principal place of occupation, and they were positioned in close proximity to major river valleys, tidal marshes, estuaries, and the nearby coastline, all of which would have supplied an abundance of plant and animal resources (McBride 1984:309). In addition to villages, numerous temporary and task-specific sites were utilized in the surrounding upland areas, as well as in closer ecozones such as wetlands, estuaries, and floodplains.

The Late Woodland period in southern New England dates from ca., 1,200 to 350 B.P., and it is characterized by the earliest evidence for the use of maize in the lower Connecticut River Valley (Bendremer 1993; Bendremer and Dewar 1993; Bendremer et al. 1991; George 1997; McBride 1984); an increase in the frequency of exchange of non-local lithics (Feder 1984; George and Tryon 1996; McBride 1984; Lavin 1984); increased variability in ceramic form, function, surface treatment, and decoration (Lavin 1980, 1986, 1987; Lizee 1994a and 1994b); and a continuation of a trend towards larger, more permanent settlements in riverine, estuarine, and coastal ecozones (Dincauze 1974; McBride 1984; Snow 1980). Late Woodland lithic assemblages typically contain up to 60 to 70 percent exotic lithics. Finished stone tools include Levanna and Madison projectile points; drills; side-, end-, and thumbnail scrapers; mortars and pestles; nutting stones; netsinkers; and celts, adzes, axes, and digging tools (McBride 1984; Snow 1980). In addition, ceramic assemblages recovered from Late Woodland sites include Windsor Fabric Impressed, Windsor Brushed, Windsor Cord Marked, Windsor Plain, Clearview Stamped, Sebonac Stamped, Selden Island, Hollister Plain, Hollister Stamped, and Shantok Cove Incised types (Lavin 1980; Lizee 1994a; Pope 1953; Rouse 1947; Salwen and Ottesen 1972; Smith 1947).

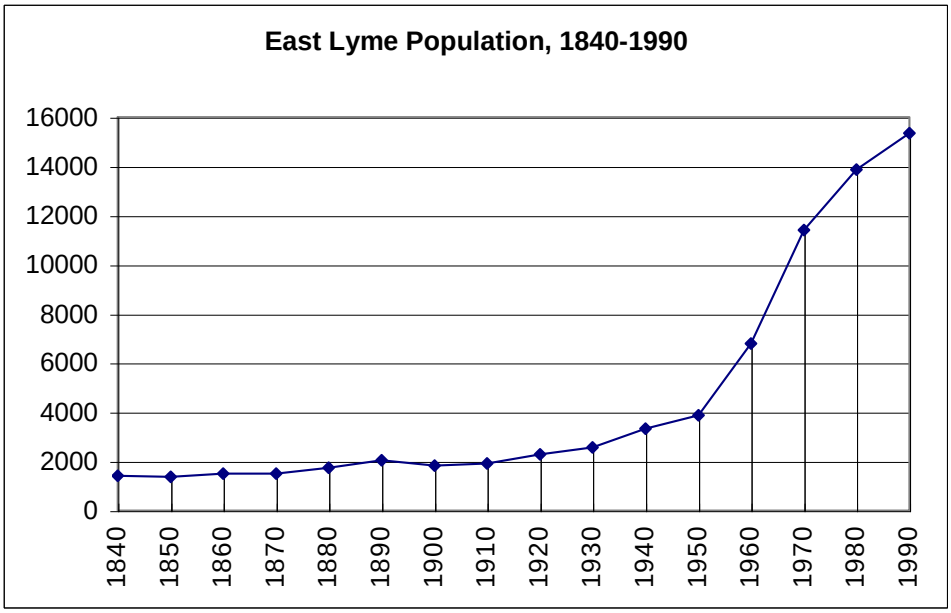
Finally, McBride (1984:323-329) characterized Late Woodland settlement patterns as more nucleated than the preceding Middle Woodland ones, with fewer, larger sites situated in estuarine and riverine ecozones. Both river confluences and coastal zones were favored areas for the establishment of large village sites that contain numerous hearths, storage pits, refuse pits, ceramic production areas, house floors, and human and dog burials (Lavin 1988; McBride 1984). McBride (1984:326) has argued that these sites certainly reflect multi-season use, and were perhaps occupied on a year-round basis (see also Bellantoni 1987). In addition to large village sites, McBride (1984:326) identified numerous temporary and task-specific sites in the uplands of the lower Connecticut River Valley and along the coastline. These sites likely were employed for the collection of resources such as plant, animal, and lithic raw materials. These sites tend to be very small, lack internal organizational structure, and usually contain a limited artifact assemblage and few cultural features, suggesting that they were occupied from only a few hours to perhaps overnight. Temporary camps, on the other hand reflect a longer stay than task-specific camps, perhaps on the order of a few days to a week, and they contain a more diverse artifact assemblage indicative of more on-site activities, as well as more features (McBride 1984:328-329). In sum, settlement patterns of the Late Woodland period are characterized by "1) aggregation in coastal/riverine areas; 2) increasing sedentism, and; 3) use of upland areas by small task groups of individuals organized for specific tasks" (McBride 1984:326).

In sum, the prehistory of Connecticut spans from ca., 12,000 to 350 B.P., and it is characterized by numerous changes in tool types, subsistence pattern, and land use strategies. For the majority of the prehistoric era, local Native American groups practiced a subsistence pattern based on a mixed economy of hunting and gathering wild plant and animal resources. It is not until the Late Woodland period that incontrovertible evidence for the use of maize horticulture as an important subsistence pursuit is available. Further, settlement patterns throughout the prehistoric era shifted from seasonal occupations of small co-residential groups to large aggregations of people in riverine, estuarine, and coastal ecozones. In terms of the region containing the proposed project parcel, a variety of prehistoric site types may be expected. These range from seasonal camps utilized by Archaic populations to temporary and task-specific sites of the Woodland era.

4.3 History of the Proposed Project Region

The present town of East Lyme was formed in 1839 out of the eastern part of the town of Lyme (founded in 1667 and itself once part of Saybrook, founded in 1635) and a sliver of Waterford lying west of the Niantic River (Waterford itself had separated in 1801 from New London, which was founded in 1648). The Area of Potential Effect lies in the northeast corner of East Lyme, near its border with Montville, and was part of Lyme before the creation of East Lyme. The founding of Saybrook in 1635 occurred as a result of the so-called "Warwick Patent," a grant of land thought at the time to have been made some time between 1629 and 1632 by the Council for New England, a corporation that had been established by the British government in 1620, and which was headed by the Earl of Warwick by 1628. The corporation's remit was for "the planting, ruling, and governing of New England in America" (quoted in Crofut 1937, 20). Pursuant to this now-lost grant, and at the orders of John Winthrop, Jr., a fort was erected on the west bank of the Connecticut River, displacing the Dutch trading post that was already there. A small settlement grew up under the leadership of George Fenwick, which was considered a separate colony until 1644. In that year, Fenwick transferred to Connecticut all his rights to the Saybrook lands, although the historical record remains unclear on exactly what rights and what lands were involved. Thereafter, Saybrook was considered a town in the Connecticut colony. In 1665, the part of Saybrook lying east of the Connecticut River was set off as a new town, at which time the "East Saybrook" settlers claimed to have enough land to support thirty families; in 1667, the General Court gave it the new settlement the name Lyme. The doubtful nature of Saybrook's claims was probably one cause of subsequent border disputes between Lyme and neighboring towns, including Saybrook itself. The East Lyme section was being called that name by 1816, and in 1839 became a separate town (Crofut 1937). This eastern part of Lyme had gained permission to organize its own ecclesiastical society in 1724 or 1725, calling it the East Society of Lyme. Further religious developments in East Lyme included the formation of a Baptist church in 1755, and a second one in 1842 (Caulkins 1852).

As the following population chart indicates (next page), the town of East Lyme began its existence with a population of 1,412, and did not surpass 2,000 until 1920 (except for 1890, when it reached 2,048). Its initial population was a little less than one-third of the total population of the parent town of Lyme, which had a population of over 4,000 for most of the time between 1774 and 1830 (CT-DEP 1996). The shoreline of East Lyme began to become a summer beach resort area in the 1880s, a development process that accelerated after the 1900 and in time began to have an effect on the size of the year-round population (Chendali 1989). Most of these changes affected the shoreline, far from the Area of Potential Effect. The period after 1950 was characterized by rapid residential growth for all Connecticut places with amenities and a location convenient to growing urban areas, such as nearby New London and Waterford. East Lyme's population increased nearly fourfold between 1950 and 1990 (CT-DEP 1996). Historically, the town's economy relied primarily on farming, supplemented by a variety of other extractive industries: fishing, which flourished in the late nineteenth century; ice production, which continued from the late nineteenth century into the twentieth; charcoaling in the more forested northern parts of the town during the early twentieth century; and granite quarrying, where the resource existed. The only textile mill of note was a cotton factory located in the village of Flanders, south of the Area of



Potential Effect, which continued in operation until the 1930s. Overall, however, during the earlier twentieth century, the main source of nonfarm income in East Lyme was from the summer resorts (Chendali 1989). Its transportation system also focused toward the south part of the town. The New London and Lyme Turnpike Company, chartered in 1807, improved a section of the Old Post Road that ran a few miles from the shoreline. This turnpike probably was abandoned sometime in the 1840s or 1850s, but before that time it was an integral part of the operations of the Connecticut River Steamboat Company, which between 1824 and 1834 ran steam ships that landed in Lyme, the passengers continuing their journey to New London by stagecoach (Wood 1919). The New Haven & New London Railroad, built through East Lyme by about 1850, hugged the shoreline and stopped at Niantic (Turner and Jacobus 1989).

Being in the north part of the town, the Area of Potential Effect was largely unaffected by these developments. The project parcel during the mid nineteenth century was described as part of a fifty acre lot in the East Lyme land records. The parcel has only been traced back as far as 1869, when it was sold by G. A. Tinker and M. Tinker of Montville to Patrick Mullen of Waterford for $900 (East Lyme Land Records, Vol. 4, Pg. 285). The Tinkers' ownership of this property dates to at least 1854, as the previously mentioned map of that date indicates with the notation "Gr. M. Tinker" south of the Area of Potential Effect (Figure 3; Walling 1854). The signatures on the 1869 deed indicate that the sellers' names were Griswold A. Tinker and Matthew Tinker. In 1850, the U.S. Census recorded this family as residing in East Lyme, near the Chapman, Fox, and Latimer families seen on the 1854 map (Figure 3). Matthew Tinker, 59, was listed as the head of the family, and as a farmer owning $2,000 in real estate. His family included Mary (49 or 69), Elsa (37), Griswold A. (24), and Matthew Jr. (15) (United States Census, 1850, Series: M432 Roll: 49 Page: 417). According to the 1869 deed, the abutting owners were:

N	Timothy Shane
E	James Miner and Ambrose Coleman
S	formerly Elisha Tracy, and G. A. & M. Tinker
W	G. A. & M. Tinker

(East Lyme Land Records, Vol. 4, Pg. 285).

This description remained essentially the same through two succeeding transfers, except that the name "Shane" was later given as "Sheehan." The 1869 historic map does show a house, labeled "M.T.," in the

approximate location of the Area of Potential Effect; this label reflects the ownership of the parcel by the Tinker family up to 1869 (Figure 4, Beers 1868). From this map, it appears that the Tinkers built the house, either for a relative or as an investment. The Tinker farm in East Lyme was the residence of four generations of Tinkers; Matthew Sr. in the 1850 census would have been born at that farmstead in about 1791 to William Tinker; Matthew Jr. himself (only 15 in the 1850 census) later had a son named Matthew, who also grew up on the farm in East Lyme (Lewis Historical Pub. 1922).

Patrick Mullen purchased the property in 1869, owned it for a short time, and sold it in 1873 to Robert and Thomas Mullen, also of Waterford, for $100. It is in this deed that there is the first mention of "buildings" in the description the parcel (East Lyme Land Records, Vol. 4, Pg. 437). The 1870 census does not list any of these people, but the vast majority of Mullens found in that census had been born in Ireland. Thus, the Mullens' ownership was most likely part of the effects of the wave of immigration from Ireland and other places in Europe that began in the late nineteenth century. In 1877, Robert alone sold the land, with buildings, to John D. Robenson of Waterford for $300 (East Lyme Land Records, Vol. 7, Pg. 39). Robinson, as his name was spelled in the next deed, sold it to William F. Thacher of Montville for $500 in 1882. This deed uses a slightly different description:

> N formerly Timothy Sheehan
> E Amos Fox and E. A. Coleman
> S formerly Elisha Tracy and G. A. & M. Tinker
> W G. A. & M. Tinker
> (East Lyme Land Records, Vol. 7, Pg. 217).

This William Thacher presents a historical difficulty, however. As of the 1850 census, a William Thatcher, a farmer aged 46, lived in Montville and owned $2,000 in real estate. He lived with Caroline M., 40, whose name appears in several East Lyme deeds associated with William F. (but not the property in question). The children were Stephen G. (11), John H. (8), and Ann Maria (4). This household shared a house with Stephen G. Thatcher (71), his presumed wife Borradil [*sic*] (81), and one Nancy Coit (79). According to the return, all of these people were born in Connecticut (U.S. Census, 1850, Series: M432 Roll: 48 Page: 212). It can be assumed that William was a son of Stephen and Borradil. The difficulty begins with the 1860 census. According to that return, William Thatcher (56), a farmer owning $12,000 in real estate and $800 in personal estate, lived with Matilda (50), Frederick (28, farmer), Stephen (22, farmer), Emma (16), John (18, farmer), Anna (15, owning $500 in personal estate), and Nancy Coit (90, owning $1,000 in personal estate) – and all of them had been born in Rhode Island (Series: M653 Roll: 91 Page: 205). The correspondence of the names and ages of William, Frederick, Stephen, John, Anna, and Nancy Coit is convincing evidence that they were the same people; but the differences open questions about the reliability of census returns that cannot be answered. Alternatively, the fact that in 1850 his apparent wife's name was given as Caroline M. suggests that perhaps her full name was Caroline Matilda, and she gave her middle name to the 1850 census taker.

The 1870 census opens additional questions about the Thachers. There, Caroline M. Thatcher, 61, owned $900 in real estate and $10,000 in personal estate, and lived in Montville with her grown children John H. (28) and Annie M. (24), all of them born in Connecticut again (U. S. Census, 1870, Series: M593 Roll: 113 Page: 274). William F. Thatcher, however, resided in Waterford and was a 38-year-old merchant, who owned $1,300 in personal estate, and lived with his wife Cornelia (35) and their son William F. (6), again all born in Connecticut (U.S. Census, 1870, Series: M593 Roll: 114 Page: 830). This cannot be the same William F. as appeared in the preceding census, but it is surely the right person, as Cornelia played an important role in the chain of title. The answer is clear enough, however: if the "F" stands for "Frederick," then he went by that name while his father William was alive; in the preceding census, Frederick was 28. Further, it is likely that his mother Caroline retained effective ownership of her husband's property until her own death. In 1880, she was still alive; the census lists her as Caroline M.

Thacher, 70, living in New London with John (38) and Annie M. (34). The form also indicates that her mother had been born in Rhode Island, and that John was epileptic and blind in one eye (U.S. Census, 1880, Series: T9 Roll: 107 Page: 17). The 1880 census lists the property-owner we are interested in as Frederick W. Thatcher, a 47-year-old farmer living in Montville with his wife Cornelia (45), son William D. (16, working on the farm), and daughter Mabel P. (7) (U.S. Census, 1880, Series: T9 Roll: 109 Page: 687).

Because the land records refer to our subject as William F. Thacher, we will continue to do so. It appears from the land records that he experienced some financial difficulties after 1880. In 1885, his wife, Cornelia K. Thacher, secured the assignment a $500 mortgage that William had given to Mariners Savings Bank of New London by paying the bank the full amount (East Lyme Land Records, Vol. 8, Pg. 156). The next item on the land records is a foreclosure on the piece of property that we are interested in, dated November 27, 1888. It is not known, however, why the foreclosure action was brought by William D. Thacher based on the Mariners Savings Bank mortgage against Cornelia K. Thacher (to whom the mortgage had been assigned) as well as William F. Thacher and two individuals whose interest in the property was not stated (East Lyme Land Records, Vol. 8, Pg. 231). William D. was William F.'s son, per the 1880 census, who would have been about 24 years old in 1888. This transaction probably reflects some legal strategy designed to protect the family's assets from creditors, as four days later William D. Thacher (resident in Bozrah) quit-claimed the property to Cornelia K. Thacher of East Lyme. The deed described the property as a single 68-acre parcel (the subject parcel being combined with other purchases), with abutting owners approximately

N Mary S. Barber
E Acceas [Amos?] Fox and E. A. Coleman
S S. Mossbroker and M. Tinker
W Highway
(East Lyme Land Records, Vol. 6, Pg. 510).

Despite the quit-claim, in 1896 both Cornelia K. and William T. Thacher of Bozrah quit-claimed the now 70-acre property to Albert G. Chapman of East Lyme. This deed gave a description that was used by succeeding deeds until 1981:

N Barber land
E Benjamin A. Fox and E. A. Coleman
S the Mossbroker Place and Matthew Tinker
W Highway leading to Flanders
(East Lyme Land Records, Vol. 10, Pg. 510).

The deeds and census records suggest that the Thacher family did not live on their property in East Lyme, so the house was probably rented out at least between 1882 and 1896, though there is no evidence that Chapman ever lived there either.

This probably changed in 1898, when Chapman sold the property to Isaac Herscowitz of New York City (East Lyme Land Records, Vol. 10, Pg. 516). Later that year, Isaac (still of New York City) took the interesting step of selling the property to Annie Weitzan of New York City, together with "one cow – one horse – also two male calves four months old – one market waggon – one lumber waggon – one carriage also barn full of hay – 70 Hens & chickens." Isaac signed the deed with a mark, indicating that he was illiterate (East Lyme Land Records, Vol. 10, Pg. 534). This deed probably represented a marriage gift, because in 1906, Isaac and Annie Herskowitz, husband and wife, sold the 70 acres and buildings to Mary Yudarsky and Jake Savin. The property was subject to two mortgages: one for $200 to Fred Thatcher, and one for $300 to the Baron de Hirsch Fund (East Lyme Land Records, Vol. 14, Pg. 378). The latter

mortgage places the Herskowitzes and their ownership of land in East Lyme into an important historical context. Between 1881 and 1907, a series of semi-organized programs in Russia killed many Jews, and as a result caused a million of them to flee to the United States by 1893, and a total of three million by 1924. Baron Maurice de Hirsche de Gereuth, a German Jewish industrialist, took up their cause through the establishment, in 1891, of the Baron de Hirsch Fund, which united with the London-based Jewish Colonization Society founded the Jewish Agricultural and Industrial Aid Society (JAIAS) in 1900. These organizations had as their main goals to assist Jewish immigrants and, wherever possible, to resettle them in agricultural communities. In Connecticut, Jewish immigrants with loans and advice from the JAIAS were part of a wave of immigrants moving onto abandoned Yankee farmland (Cunningham and Ransom 1998).

The Herskowitz mortgage, which presumably dated to Isaac's purchase in 1898, is an unusually early incident of this type, predating the formal organization of the JAIAS by two years. It is also a bit unusual because according to the 1900 census, Isaac and Annie Herskow had been born in Romania and Hungary, respectively, rather than Russia. Isaac was 43, and Annie was 42; his son Abiel (19) had been born in Romania, and her daughter Sadei (12) had been born in Hungary. Annie reported that she had borne only one child, so the two sons born in New York, Mirris (9) and Charles (7), must also have been Isaac's by his previous marriage. Interestingly, the grandparentage of these children indicates that their mother was also Hungarian. The form also reports that Isaac had become a naturalized citizen, was a farmer owning his own mortgaged farm, and did not speak English; Abiel worked as a farm hand. Most of the people listed on the same page as the Herskowitzes were Connecticut or New England natives; although, there was a family of Russians and several Swedes (U.S. Census 1900, Series: T623 Roll: 148 Page: 46).

The ownership of the Area of Potential Effect between the 1906 sale to Mary Yudarsky and Jake Savin and 1966 is uncertain. Mary Yudarsky cannot be found in East Lyme in the 1910 census, although a 55-year-old German-born Mary Yardusky was living in Montville a few doors down from the Isaac Herscowitz family. More importantly, a Jacob Sabin also was living nearby in Montville; he was a 37-year-old farmer, a Russian who spoke both Yiddish and English, married to Sarah (33, a Yiddish-speaking Russian) and with American-born children Bessie (12), Moses A. (9), Abraham I. (8), and Isador (10 months) (U.S. Census, 1910, Series: T624 Roll: 142 Page: 73). The 1966 transfer was a series of quit-claims from Bessie Kirshenbaum, Moses A. Savin, Isadore A. Savin, and Abraham A. Savin (East Lyme Land Records, Vol. 109, Pgs. 312, 314, 318). Bessie Kirshenbaum appears in the 1930 census, living in Montville with her husband Abraham (both born in New York of Russian parents) and mother Sarah Savin (immigrated from Russia in 1895) (U.S. Census, 1930, Series: T626 Roll: 282 Page: 63). The Area of Potential Effect is close to the Montville town line, but nonetheless this information indicates that the house on the subject property was probably rented out after 1906. It is likely that the renters were fellow immigrants known to the Savins, but this cannot be known for certain.

Exactly when the house was abandoned is unknown. It was probably built in the 1860s by the Tinker family and soon sold; the documentary evidence suggests that it was generally occupied by renters rather than its owners, with the probable exception of the Herskowitz family between 1898 and 1906. The 1934 aerial photograph shows the cluster of farm buildings near the Area of Potential Effect, together with its access road or driveway connecting it to Grassy Hill Road, and the associated fields and reforested areas within and adjacent to the larger land parcel (Figure 5). In the 1951 aerial photograph, approximately the same situation appears to obtain, except that the forest cover had grown thicker in the areas surrounding the subject property (Figure 6). Between 1951 and 1970, some interesting changes took place: new cleared agricultural areas appeared west of Area of Potential Effect, and a subdivision had been built south of it (Figure 7). By 1986, the reforestation of a number of the fields within the previously agricultural area was complete, and there were signs of additional nearby residential development (Figure 8). The 2004 and 2012 aerial photographs show a landscape in which the few remaining agricultural fields stand out strongly against a background of forest and residential development. A new house had

been built along the Area of Potential Effect's access road, while large subdivisions had appeared to the east and south (Figures 9 and 10).

As of 2005, the town's population had risen to 18,610; it had 6,588 households with a median income of $74,022 and was only 81% white. Consistent with Connecticut and U.S. trends, employment in East Lyme was dominated by trade and services (56.1%, with another 19.9% in government); agriculture (1.1%) was far from the dominant force it once had been. The remaining cleared fields in the vicinity of the Area of Potential Effect may have been associated, probably by rental arrangement, with one or more of the19 surviving agricultural firms in the town, which comprised only 2.4% of the total number of firms. A 2005 study found that 75% of East Lyme's workers commuted to jobs outside the town, with 39% of those traveling to Groton and New London, and the rest scattering among six other nearby towns (CERC 2006). The economic and social landscape of the town has changed numerous times in its history, with its current phase reflecting the highly mobile and increasingly diverse population of the state and the nation.

4.4 Previous Investigations

As mentioned above, the current effort also involved an examination of State Historic Preservation Office records as they pertain to archeological sites, historic standing structures, and National Register Properties situated within or immediately adjacent to the Area of Potential Effect. This literature review revealed that while there are no previously identified cultural resources within the Area of Potential Effect, a single previously recorded site (Site 45-62) was located adjacent to the currently proposed project area. In addition, the subject property had been subjected to a previous cultural resources investigation (CHPC #1554 and #1691; Figure 11). This investigation and the previously identified archeological site resulting from that investigation are discussed below in more detail.

4.41 Site 45-62

A Phase IB cultural resources reconnaissance survey of the then proposed Walnut Hills Chase Housing Subdivision in East Lyme, Connecticut was completed by Heritage Consultants, LLC in 2007. This investigation encompassed the northern third of the currently proposed project area. During the Phase IB cultural resources reconnaissance survey, two areas of the proposed subdivision were deemed to retain archaeological sensitivity and they were shovel tested for cultural material and evidence of intact cultural deposits. The remainder of the project parcel was subjected to pedestrian survey, photo-documentation, and mapping only. Within the tests areas, transect survey was utilized whereby all survey transects were situated parallel to each another, and shovel tests situated on each transect were excavated at 15 and 30 m (49.2 and 98.4 ft) intervals depending upon the perceived probability to produce cultural resources, as well as local soil conditions and levels of disturbance. The investigation resulted in the identification of a single historic period archaeological site (Site 45-62). Despite the excavation of 20 of 22 shovel tests throughout the site area, no evidence of significant cultural deposits was encountered; however, pedestrian survey of the site area resulted in the identification of a single historic farmhouse, two modern sheds, a silo foundation, a barn foundation, and a stone-lined well. This structure may represent the Tinker house discussed above, but it had been substantially altered from its original historic construction. Detailed examination of these items indicated that, with the exception of the stone-lined well, they had been greatly modified and/or destroyed. Thus, they retained little to no architectural significance. In addition, examination of the archaeological deposits associated with Site 45-62 indicated that they consist of domestic items typical of the late nineteenth and early twentieth centuries. They retain no unique qualities, and they, along with the architectural elements of Site 45-62 possessed no significant research potential. Thus, they were assessed as not significant applying the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]. No additional archaeological testing of Site 45-62 was recommended prior to construction of the proposed Walnut Hill Chase Housing Subdivision, but it was recommended that the stone-lined well located in the eastern portion of Site 45-62 be filled with clean sand and covered over during the construction of the proposed housing subdivision.

5.0 Results of the Pedestrian Survey

In addition to the above-referenced archival research and literature review, personnel representing Heritage Consultants, LLC completed a pedestrian survey of the proposed project parcel. During that review, the Area of Potential was visually reconnoitered, photo-documented, mapped, and assessed with to the results of the background research and its likelihood to produce intact cultural deposits. The result of the field effort is reviewed below.

Pedestrian survey and photo-documentation of the Area of Potential Effect revealed that much of the proposed project parcel has been subjected to heavy impacts related heavy equipment usage, past farming practices, and erosion on slopes (Figure 12, Photos 1 through 20). The agricultural fields located in the northern portion of the Area of Potential Effect, has also been impacted by localized areas of grading and percolation testing. These fields were subjected to a systematic Phase IB Cultural Resources Survey as part of the Walnut Hill Chase Subdivision described above (CHPC #1554 and #1691). During that survey, shovel testing of these fields failed to yield any cultural material. A high water table was noted at that time and pools of water were identified on the surface during the current investigation. Site 45-62, which was identified during the Phase IB survey, is situated outside of the current project limits associated with the currently proposed solar field. As a result, no additional investigation of the northern portion of the currently proposed project area is recommended.

The southern portion of the Area of Potential Effect contains a large previously disturbed area characterized by numerous tree throws, push piles, areas of significant slope, and moderate to severe localized erosion (Photos 1 through 10). Numerous mechanical pushpiles throughout the forested area were observed, but their purpose could not be determined. This area also has been subjected to percolation testing and the construction and long-term use of buildings that encroach illegally upon the Area of Potential Effect (Photos 1, 2, 4, and 5). These buildings also have associated water lines and other buried utilities extending from them to the east. The use of these buildings and the discard of numerous types of modern material in their vicinity have resulted in significant disturbances to the southern end of the Area of Potential Effect. Due to the degree of disturbances and excessive slopes in the southern portion of the currently proposed project area, it is highly unlikely that intact cultural remains exist within this portion of the Area of Potential Effect. Thus, it is the professional opinion of Heritage Consultants, LLC, that further archeological investigations of the southern portion of the proposed solar field are not warranted.

Finally, just outside the edge of the proposed project parcel, the Tinker family cemetery was noted (Figure 11). It is situated in the southwest corner of where the western project perimeter changes from an easterly to southerly direction. Although the cemetery is located beyond the stonewalls that form the parcel boundaries, it is recommended that a 6 m (20 ft) buffer from the stone wall be established to ensure that no unmarked graves are disturbed during construction. This cemetery falls under the protection of Connecticut General Statutes Section 53a-218 (Interference with a cemetery or burial ground).

6.0 Curation

Following the completion and acceptance of the Final Report of Investigations, all project drawings, maps, photographs, and field notes will be curated with Dr. Nicholas Bellantoni, Office of Connecticut State Archaeology, Box U-4214, University of Connecticut, Storrs, Connecticut 06269.

7.0 Summary and Management Recommendations

In sum, pedestrian survey, photo-documentation, and mapping of the proposed project parcel confirmed that much of the Area of Potential effect has been impacted heavily and no longer retains archaeological potential. It is the professional opinion of Heritage Consultants, LLC that these portions of the Area of Potential Effect do not need to be examined using subsurface techniques prior to the construction of the

planned solar subdivision. In addition, those areas that appear to retain intact deposits were subjected to a Phase IB Cultural Resources Survey as part of the proposed Walnut Hill Chase subdivision project. At that time, no evidence of significant cultural material was identified within the currently proposed solar field project bounds. As result, it is the professional opinion of Heritage Consultants, LLC that the planned solar field construction will not impact any potentially significant or significant cultural resources. No additional testing of the Areas of Potential Effect is recommended at this time. However, the Tinker family cemetery was noted outside of, but in close proximity to the proposed development. It is recommended that a 6 m (20 ft) buffer from the stone wall be established to ensure that no unmarked graves are disturbed during construction.

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FIGURES

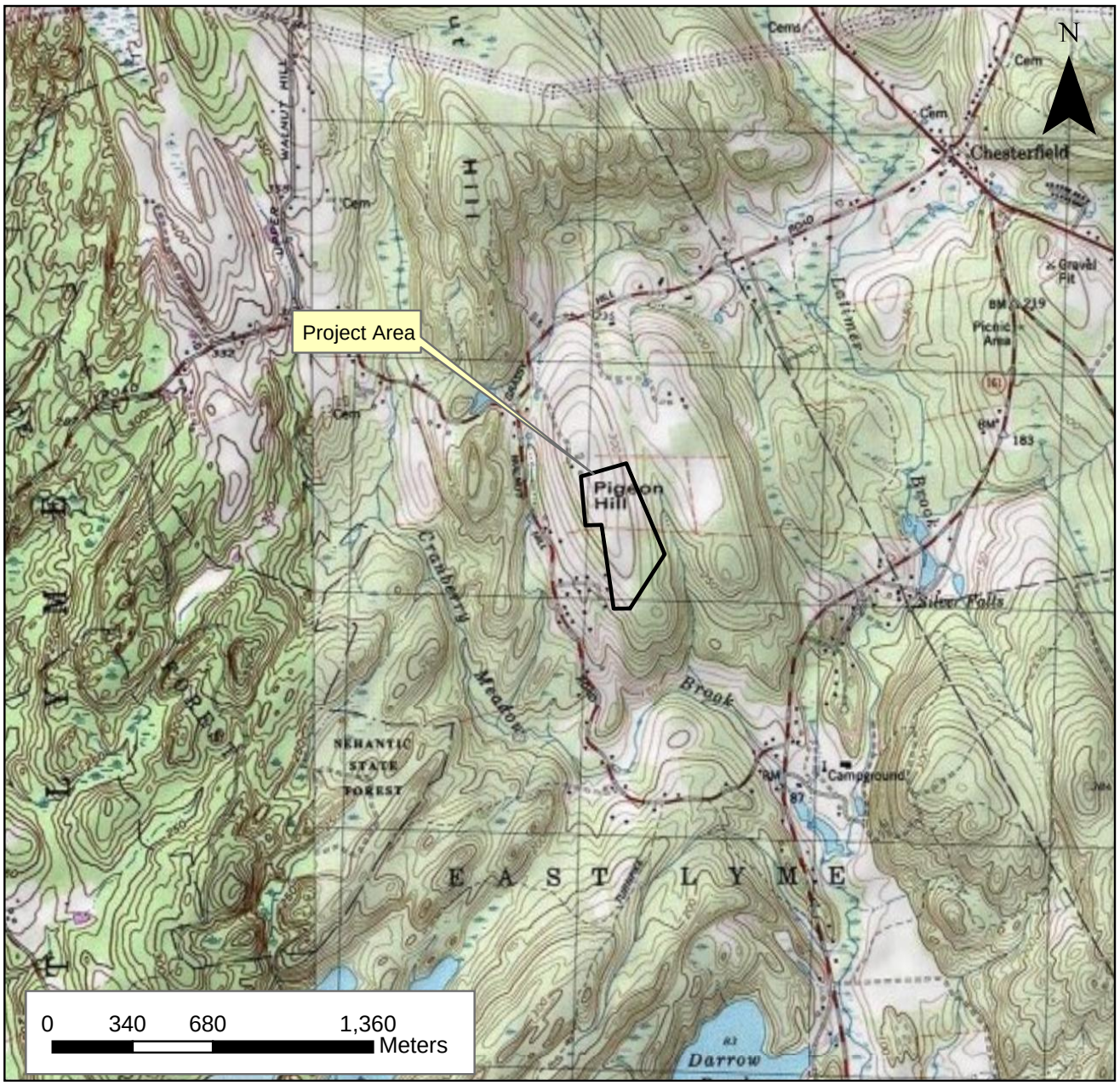

Figure 1. Excerpt from a recent USGS topographic quadrangle, depicting the approximate location of the Area of Potential Effect.

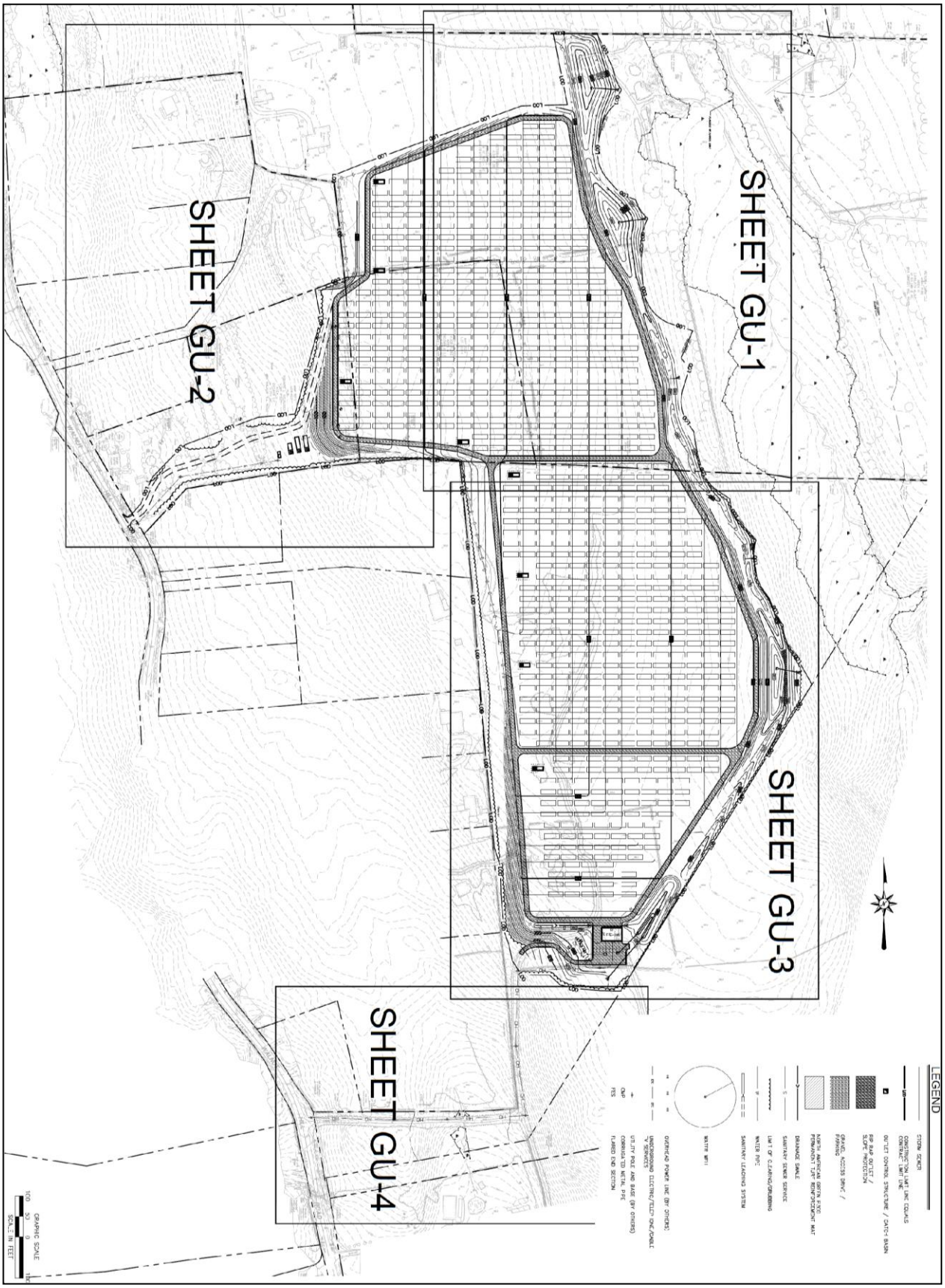

Figure 2. Project plans for the proposed solar subdivision in East Lyme, Connecticut.

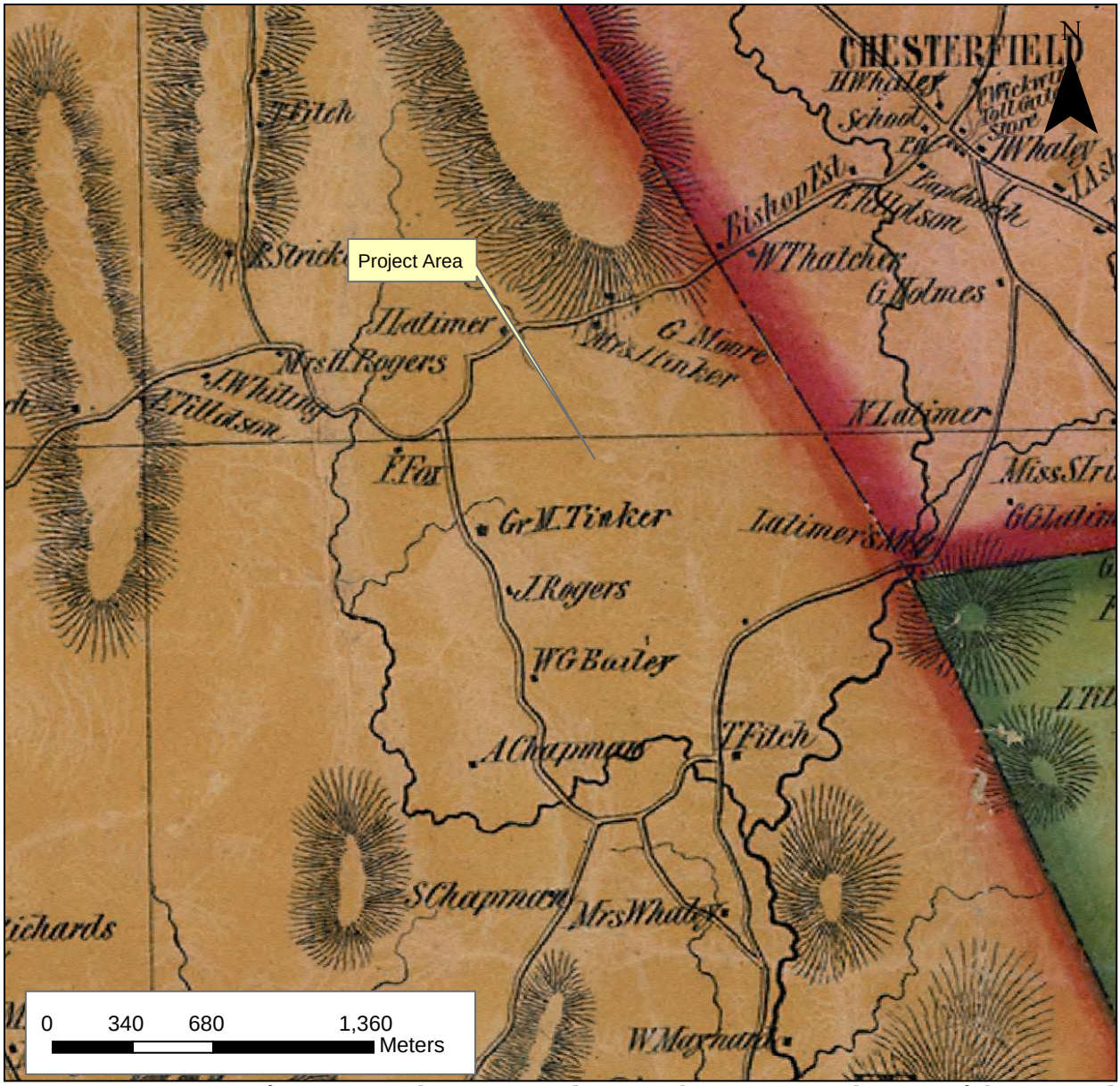

Figure 3. Excerpt from an 1854 historic map, depicting the approximate location of the proposed Area of Potential Effect.

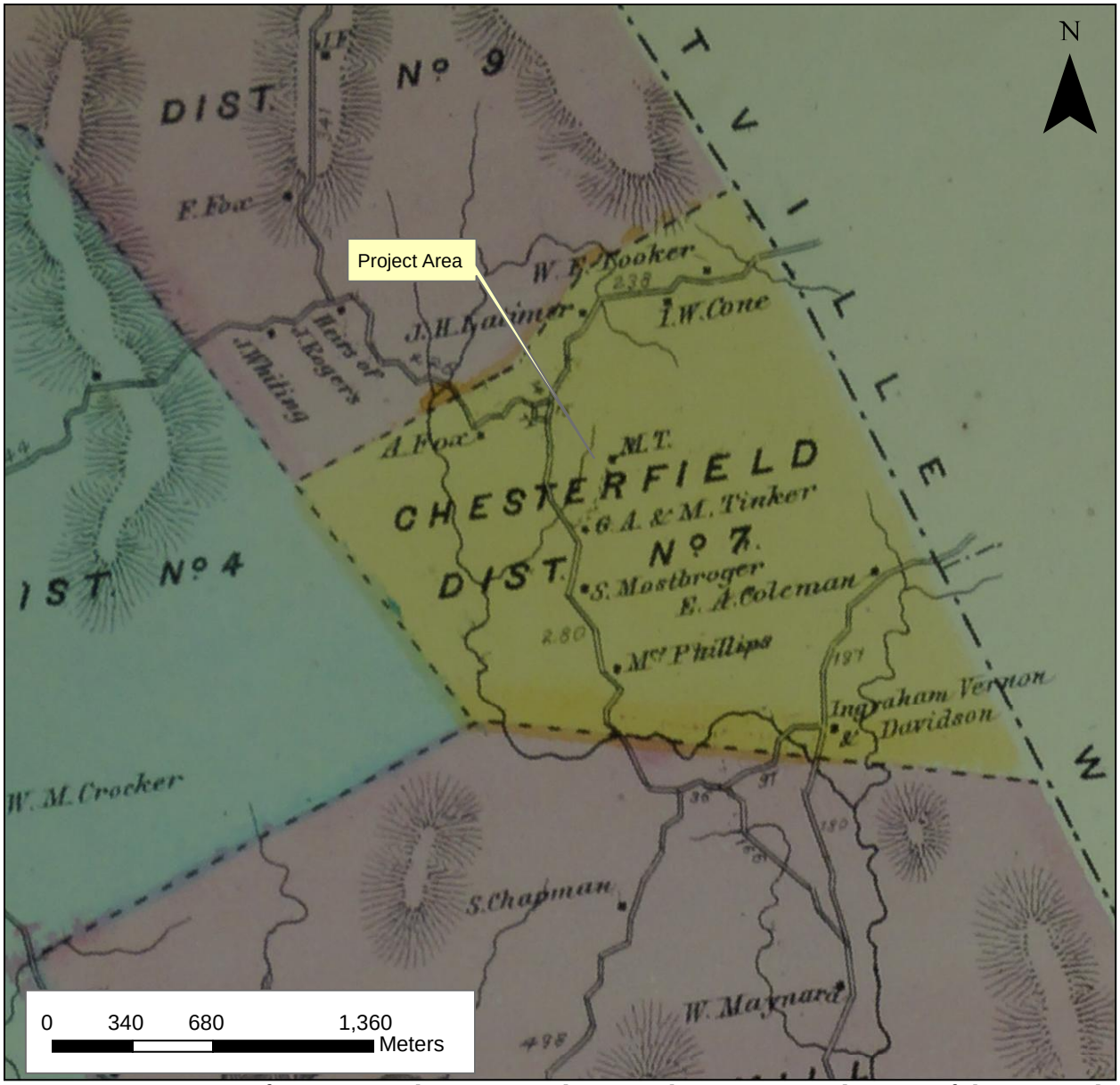

Figure 4. Excerpt from an 1869 historic map depicting the approximate location of the proposed Area of Potential Effect.

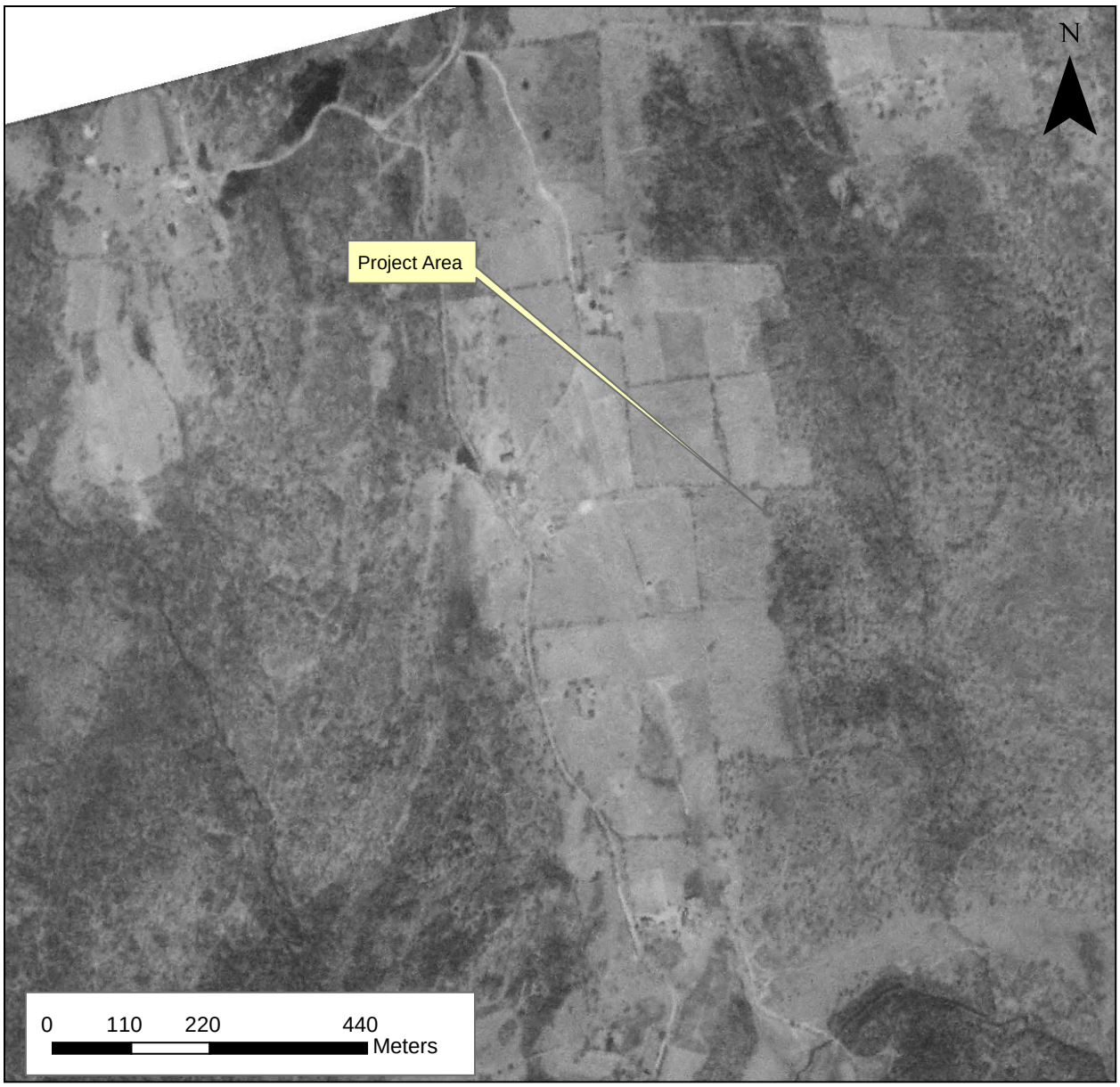

Figure 5. Excerpt from a 1934 aerial photograph, depicting the approximate location of the proposed Area of Potential Effect.

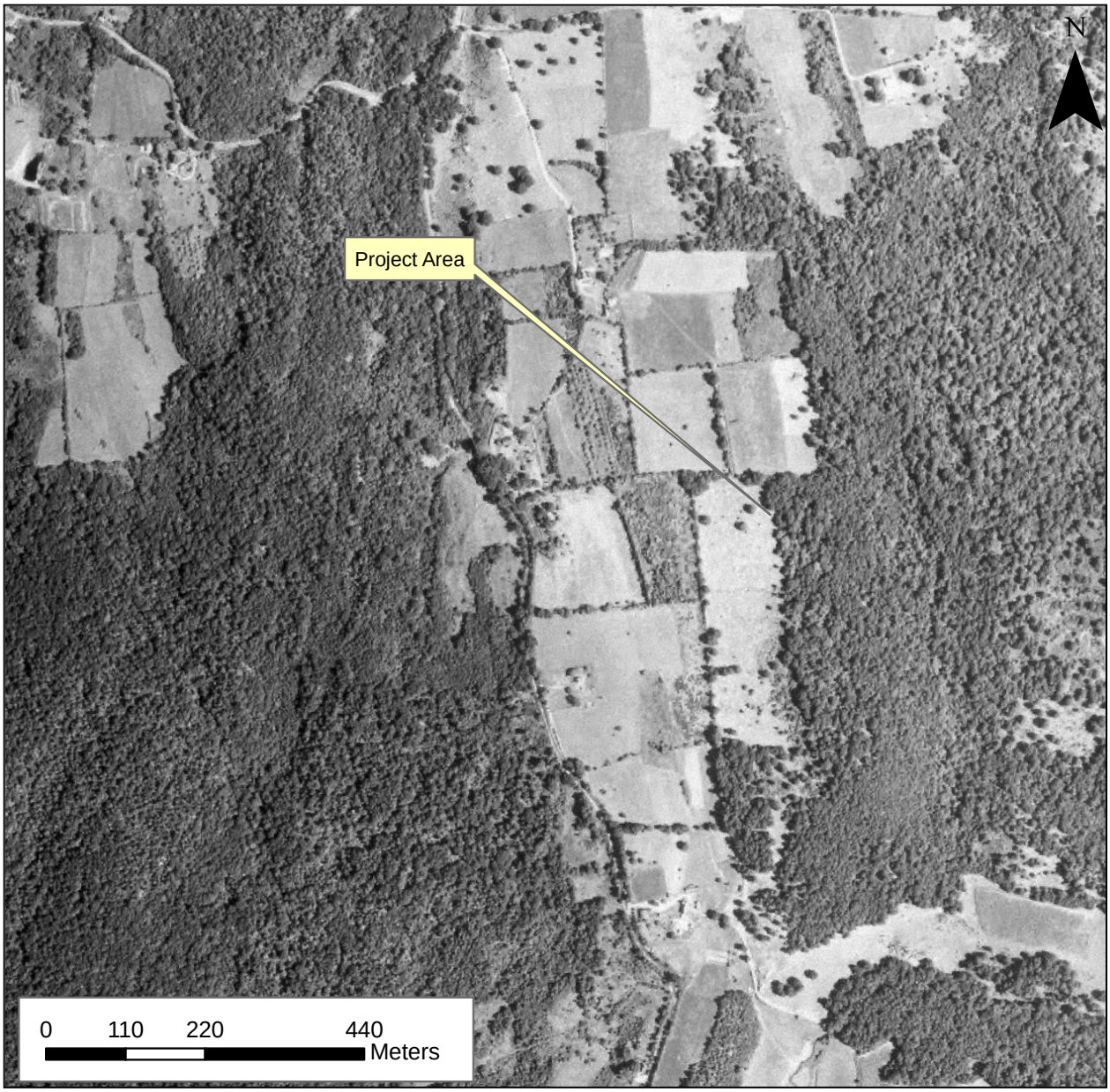

Figure 6. Excerpt from a 1951 aerial photograph, depicting the approximate location of the proposed Area of Potential Effect.

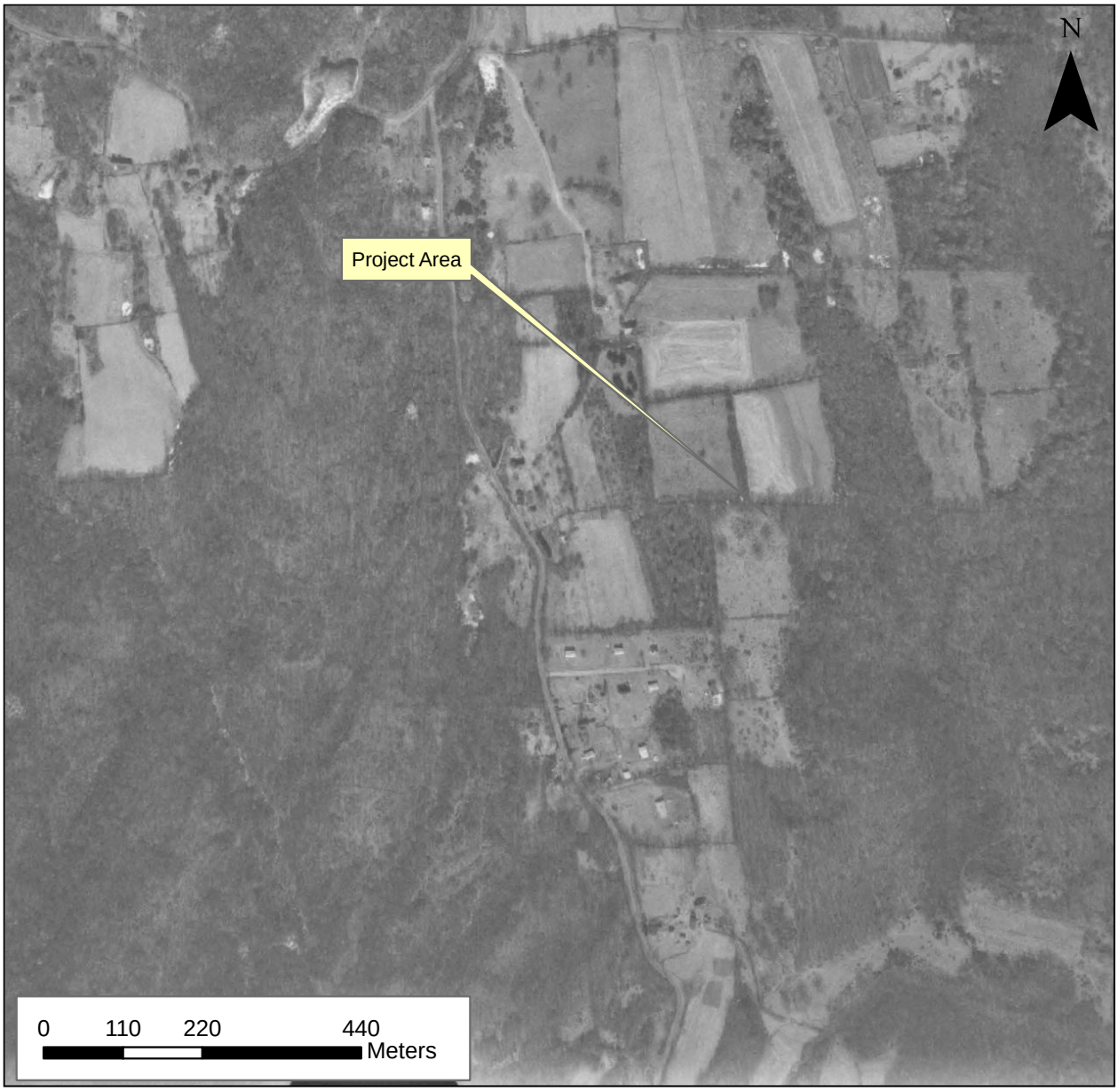

Figure 7. Excerpt from a 1970 aerial photograph, depicting the approximate location of the proposed Area of Potential Effect.

Figure 8. Excerpt from a 1986 aerial photograph, depicting the approximate location of the proposed Area of Potential Effect.

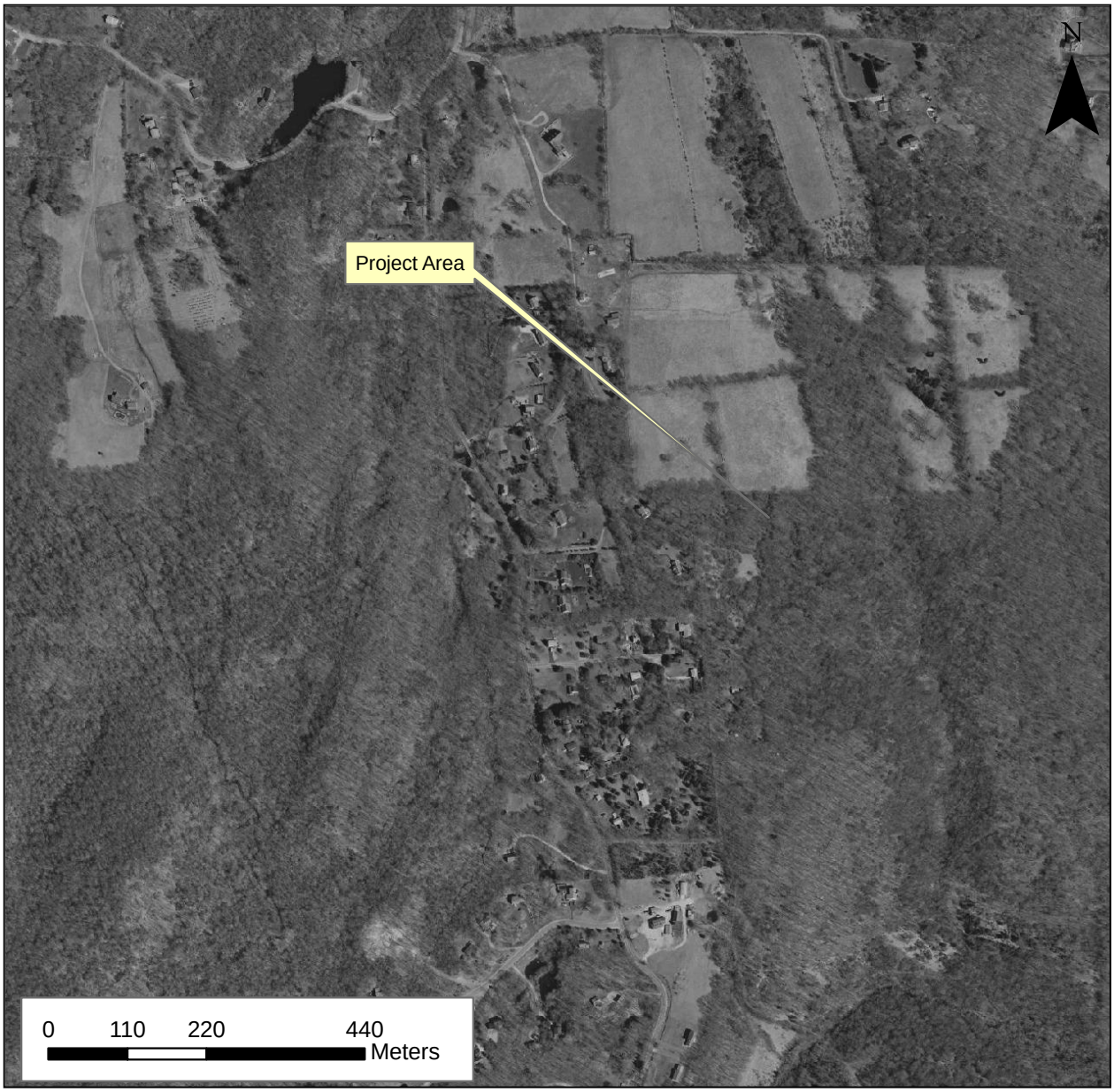

Figure 9. Excerpt from a 2004 aerial photograph, depicting the approximate location of the proposed Area of Potential Effect.

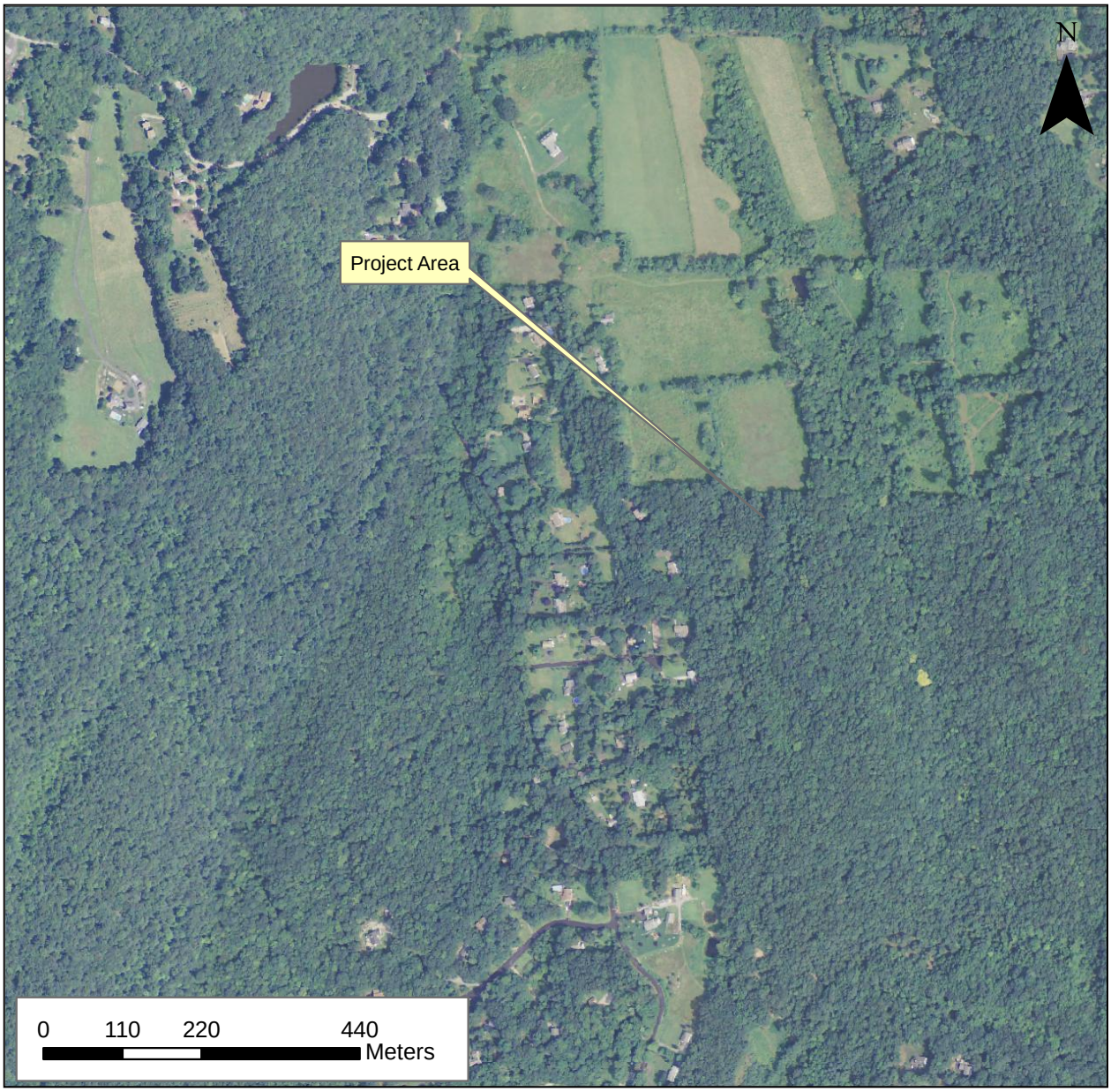

Figure 10. Excerpt from a 2012 aerial photograph, depicting the approximate location of the proposed Area of Potential Effect.

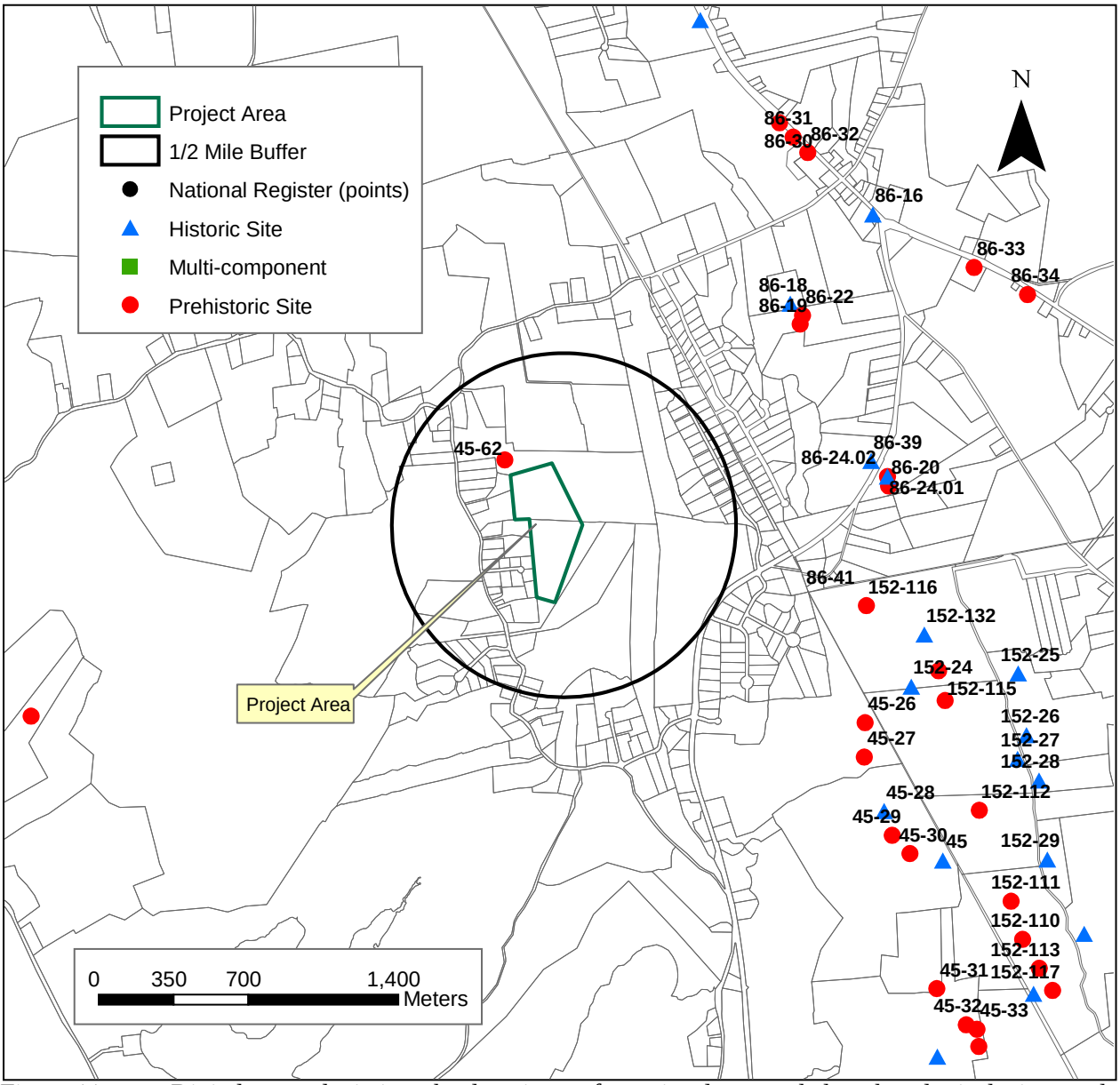

Figure 11. Digital map depicting the locations of previously recorded archaeological sites and historic properties in the vicinity of the proposed solar field.

Figure 12. A recent aerial photograph depicting the approximate project limits with the location and direction of Photographs 1 through 20.

PHOTO-DOCUMENTATION

Photo 1. Overview photo of the southernmost portion of the project area, facing north.

Photo 2. Overview photo of the southernmost portion of the project area, facing northwest.

Photo 3. Overview photo of the southernmost portion of the project area, facing southwest.

Photo 4. Overview photo of an abandoned cabin in the southern portion of project area, facing northwest.

Photo 5. Overview photo of the southern portion of the project area, facing northwest.

Photo 6. Overview photo of the southern portion of the project area, facing southwest.

Photo 7. Overview photo of the southeastern portion of the project area, facing south.

Photo 8. Overview photo of the southeastern portion of the project area, facing west.

Photo 9. Overview photo of the southwestern portion of the project area, facing northeast.

Photo 10. Overview photo of the southwestern portion of the project area, facing southeast.

Photo 11. Overview photo of the Tinker Family Cemetery (note upright and horizontal headstones) outside of the project area, facing west.

Photo 12. Overview photo of the central portion of the project area, facing south.

Photo 13. Overview photo of the central portion of the project area, facing south.

Photo 14. Overview photo of the central portion of the project area that was subjected to shovel testing, facing west.

Photo 15. Overview photo of the northern portion of the project area that was subjected to shovel testing, facing south.

Photo 16. Overview photo of the northern portion of the project area that was subjected to shovel testing, facing west.

Photo 17. Overview photo of the proposed access road, facing south.

Photo 18. Overview photo of the proposed access road, facing northeast.

Photo 19. Overview photo of the proposed access road, facing southwest.

Photo 20. Overview photo of the proposed access road, facing northeast.

ATTACHMENT 2

March 6, 2013

Atty. Lee D. Hoffman
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702

Subject: Comments on Proposed GRE East Lyme, LLC Antares Solar Field east of Walnut Hill Road, East Lyme

Dear Attorney Hoffman,

The State Historic Preservation Office is responding to your request for our review of a proposed Antares Solar Field on approximately 35 acres of land in the Town of East Lyme. The affected properties are located on Pigeon Hill and include 40 and 44 Grassy Hill Road, 89 Walnut Hill Road, and Walnut Hill Road Rear. The proposed solar facility will include over 17,500 photovoltaic modules and electrical interconnection of the modules. Fencing and landscaping are planned to minimize the visual impacts of the facility on the surrounding residences. This proposal is the subject of a petition filed with the Connecticut Siting Council pursuant to Connecticut General Statutes Section 16-50k(a) pertaining to electric generating facilities. We provide the following comments regarding the potential impacts to historic properties eligible for listing in the State or National Registers of Historic Places, inclusive of archaeological resources which may be present within the project limits.

SHPO notes that a previously proposed residential subdivision encompassing the majority of the solar field project area was assessed for potentially significant archaeological or historic architectural resources in 2006 and 2007. An archaeological reconnaissance survey conducted by Heritage Consultants, LLC (Heritage) resulted in the identification of a late 19th through early 20th century residential archaeological site (Site 45-62) in the western section of the current project limits. The archaeological resources are associated with a small farmstead and vernacular style house that was still standing at the time of the surveys. Based on the results of the completed investigations, that site and house were determined to be *ineligible* for listing in the National Register of Historic Places due to compromised integrity and a limited potential to provide important new information on the past. Based on the survey, it is SHPO's opinion that Site 45-62 is <u>also ineligible</u> for listing in the State Register of Historic Places. No other potentially significant historic resources were identified within the proposed subdivision and no additional investigations were recommended by Heritage.

The previously surveyed area substantially overlaps the proposed solar facility. The unsurveyed lands considered here include a wedge shaped parcel extending south and tapering to the west of the former subdivision proposal and a smaller parcel extending between the southern boundary of the subdivision lands and Walnut Hill Road to the west. Although we recommend no additional investigations within the previously surveyed sections, SHPO notes that the southwestern flank of Pigeon Hill would have provided potentially attractive vantage points of the valley through which present-day Walnut Hill Road runs. Such locations were often used by Pre-Contact Period Native Americans to monitor game movements, as suggested by the results of the extensive investigations of the Route 11 extension corridor located approximately 1 to 1.5 miles east of this project area. It is therefore our opinion that the southern extension of project area has a moderate potential to contain significant archaeological resources that may be affected by the proposed construction. We recommend that these areas be subject to supplementary archaeological reconnaissance survey to determine if subsurface cultural resources are present within lands that would be subject to ground disturbance during the construction or operation of the proposed solar facility. The recommended survey should adhere to SHPO's *Environmental Review Primer for*

Connecticut's Archaeological Resources and our office should be provided with the opportunity to review and comment on the completed survey.

The State Historic Preservation Office appreciates the opportunity to review and comment on this proposal and the CT Siting Council's consideration of historic resources in the exercise of its jurisdiction. We look forward to working with you and your clients on this important renewable energy project. If you have any questions concerning our comments please contact me at (860) 256-2761 or Daniel.Forrest@CT.gov.

Sincerely,

Daniel T. Forrest
Deputy State Historic Preservation Officer

CC: Bellantoni/OSA

ATTACHMENT 3

PULLMAN
&COMLEY LLC
ATTORNEYS

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February 25, 2013

Dr. Daniel Forrest
State Historic Preservation Office
One Constitution Plaza
Hartford, CT 06103

Re: Request for Archeological Resources Review

Dear Dr. Forrest:

The purpose of this letter is to request, on behalf of our client, GRE 314 East Lyme, LLC, your office's review of the proposed Antares Solar Field for potential impacts to archaeological resources.

GRE 314 East Lyme, LLC, is proposing to construct an approximately five (5) megawatt (MW) photovoltaic renewable energy system on approximately thirty-five (35) acres at 40 and 44 Grassy Hill Road, 89 Walnut Hill Road, and Walnut Hill Road Rear in East Lyme, Connecticut (Figure 1). The project consists primarily of the construction and installation of over 17,500 photovoltaic modules on the property and electrical interconnection of the same. The project will be surrounded by fencing and landscaping so as to minimize visual impacts of the project from the road and nearby residences. The solar facility operates silently and exclusively uses sunlight as fuel. The project is one of two solar developments selected by the Connecticut Department of Energy and Environmental Protection (CTDEEP) on December 23, 2011. GRE 314 East Lyme, submitted its Petition to the Connecticut Siting Council for a Declaratory Ruling for the Location, Construction, and Operation of a Renewable Energy Facility pursuant to Connecticut General Statues § 16-50k(a) on December 17, 2012.

Please do not hesitate to contact me if you have any questions about this request.

Sincerely

Lee D. Hoffman

Enclosures: Figure 1 – Site Location Map
Figure 2 – Proposed Site Renderings

Figure 1. Site Location Map

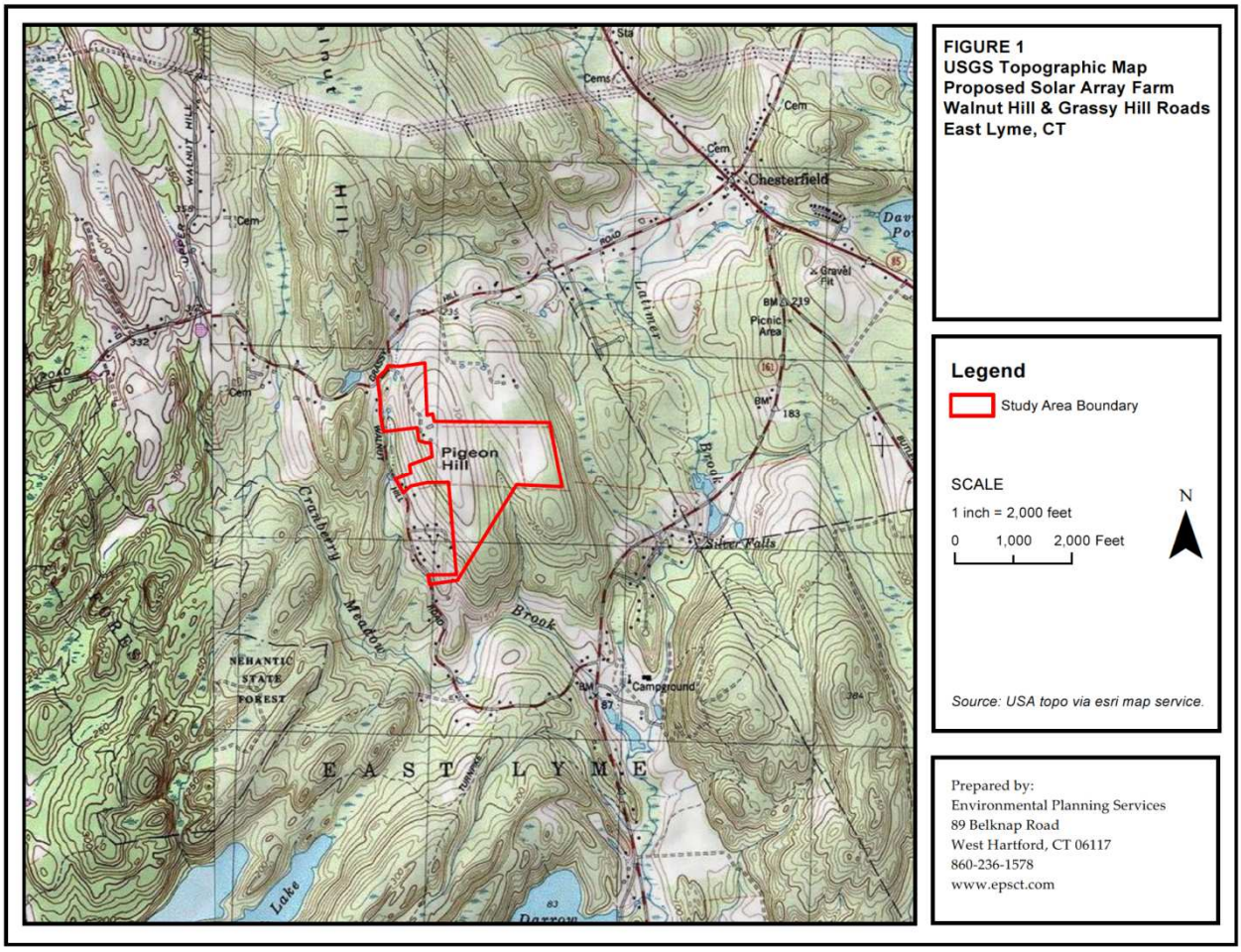

Figure 2a. Rendering of View of Project from Ground Level

Figure 2b. Rendering of View of Project from Nearby Second Story