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May 6, 2020

Via Electronic Mail

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: ***Petition 1397*** – Constitution Solar, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 20-megawatt AC solar photovoltaic electric generating facility on approximately 149 acres comprised of four separate parcels located off of Cornell Road in Plainfield, Connecticut and associated electrical interconnection – ***SHPO Correspondence and Stone Wall Buffer***

Dear Ms. Bachman:

On behalf of the petitioner, Constitution Solar, LLC (the “Petitioner”), enclosed please find correspondence from the Connecticut State Historic Preservation Office (“SHPO”) dated March 31, 2020 related to the Constitution Solar Project (the “Project”).

On April 23, 2020, the Council granted the Petitioner’s Motion for Protective Order related to the Phase IB/Phase II Cultural Resources Report prepared by Heritage Consultants, LLC on the basis it contains confidential information related to specific locations of cultural resources identified at the Project Site, pursuant to Connecticut General Statutes §1-210(b). The SHPO correspondence has been redacted to protect the confidential information in the Phase IB/Phase II Cultural Resources Report, namely the specific locations of cultural resources identified at the Project Site. An unredacted copy of the SHPO correspondence has been separately provided to the Council.

The Petitioner asks that the Council accept the SHPO correspondence as state agency written comments.

In addition, as a result of discussions with SHPO, the Petitioner has revised a buffer around a unique stone wall in Locus 4-1. The Petitioner has reflected this minor modification to the Project Layout in the enclosed Figure 1 – Stone Wall Buffer.

Please do not hesitate to contact the undersigned or David Bogan of this office (860-541-7711) should you have any questions regarding this submission.

82699259v.2

Very truly yours,

A handwritten signature in cursive script that reads "Kate Boucher". The letters are fluid and connected, with a prominent loop on the letter 'B'.

Kathryn E. Boucher

Enclosures: SHPO Correspondence (March 31, 2020)
Figure 1 – Stone Wall Buffer



March 31, 2020

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

Subject: Phase IB Cultural Resource Reconnaissance Survey and
Phase II National Register of Historic Places Testing and Evaluation, Revised
Locus 4
Constitution Solar
Plainfield, Connecticut
ENV-20-0480

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the archeological survey report prepared by Heritage Consultants, LLC (Heritage), dated January 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 facility includes the installation of an 80 acre solar photovoltaic (PV) electric generating facility located within an approximately 149 acre study area, bounded by Black Hill Road and private residences to the south, to the east by Cornell Road, and to the north and west by the Quinebaug River. The facility will be interconnected by a right of way (ROW) leading to Black Hill Road. The submitted report is well-written, comprehensive, and meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

In a letter dated March 26, 2018, the result of a Phase IA cultural resource survey, this office recommended that a Phase IB professional cultural resources assessment and reconnaissance survey that includes subsurface testing techniques be completed prior to construction in those areas identified to have moderate to high archaeological sensitivity. [REDACTED]

[REDACTED]

State Historic Preservation Office

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[Redacted text block]

[Redacted text block]

The proposed Constitution Solar Project would constitute no adverse effect to this important archaeological site conditional upon the professional data recovery utilizing a scope of work approved by this office prior to the initiation of any additional work.

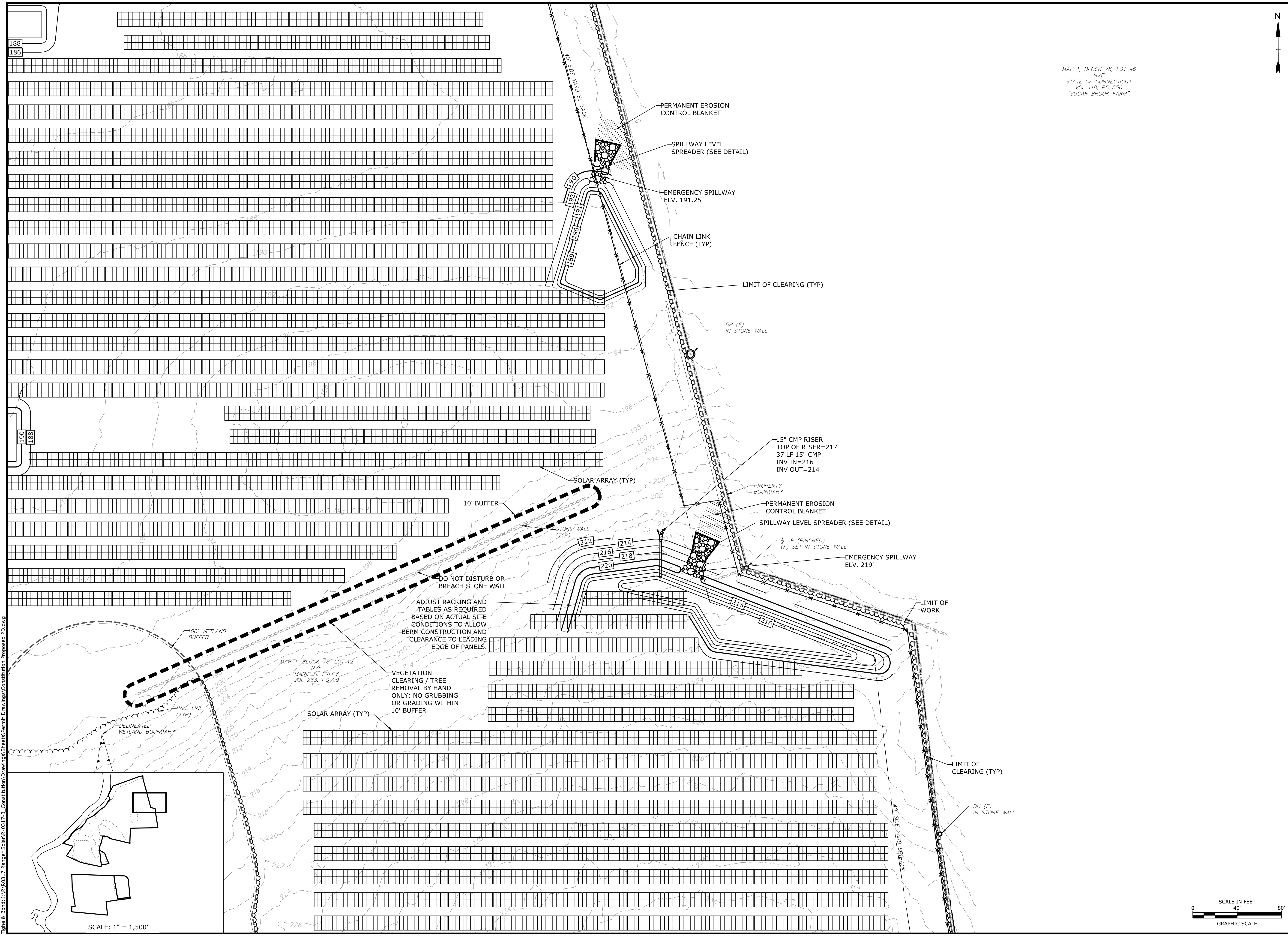
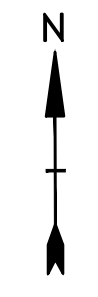
Lastly, a single above-ground resource, an unusual stone wall exhibiting vertical stone segments used to hold horizontal logs to add height to the wall, was identified along the southeastern boundary of Area 4. This office concurs that the wall should be avoided during construction, and recommends that a 10 foot buffer be implemented, that tree clearing within the buffer occur only by hand, with no grubbing of stumps, and that the entirety of the wall be clearly marked on project maps and in the field so that construction crews can minimize harm to the wall.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut’s cultural resources. We look forward to additional consultation once the scope of data recovery is developed. 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,

Mary B. Dunne
State Historic Preservation Officer

MAP 1, BLOCK 78, LOT 46
N/F
STATE OF CONNECTICUT
VOL 118, PG 550
"SUGAR BROOK FARM"



**PERMIT SET
NOT FOR
CONSTRUCTION**

**Constitution
Solar**

Constitution
Solar, LLC

Plainfield,
Connecticut

MARK	DATE	DESCRIPTION
PROJECT NO:	R0317-003	
DATE:	03/23/2020	
FILE:	Constitution Proposed PD.dwg	
DRAWN BY:	ALG/ELD	
CHECKED BY:	BSH/JEC	
APPROVED BY:	FJH	

STONE WALL BUFFER

SCALE: 1"=40'

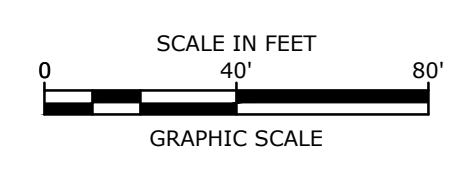


FIGURE 1

Last Saved: 4/2/2020 10:06pm By: AG/chrish
 Plotted On: Apr 02, 2020 1:06pm By: AG/chrish
 Tighe & Bond: 330 N. Main St., Suite 100, Plainfield, CT 06460-3517