

June 27, 2025

David George
Heritage Consultants, LLC
830 Berlin Turnpike
Berlin, CT 06037
(sent via email only to dgeorge@heritage-consultants.com)

Subject: Cultural Resources Survey of a Proposed Solar Development
54 South Street
Morris, Connecticut

Dear David George:

The State Historic Preservation Office (SHPO) received the following technical reports prepared by Heritage Consultants, LLC (Heritage):

- Phase IB Cultural Resources Reconnaissance Survey of a Proposed Solar Center at 54 South Street in Morris, Connecticut, dated December 2024

-Additional Phase IB Cultural Resources Reconnaissance Survey of a Proposed Solar Facility at 54 South Street in Morris, Connecticut, dated June 11, 2024

The submitted technical reports are comprehensive and meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*. SHPO understands that the proposed project consists of the construction of a solar array with associated site improvements in a project area measuring approximately 25.4 acres in size within a larger 57.6-acre parcel. The project will require a permit issued by the Connecticut Department of Energy and Environmental Protection through the authority of the Environmental Protection Agency; therefore it is subject to review by this office pursuant to Section 106 of the National Historic Preservation Act, as amended.

The investigation included a contextual overview of the region containing the project area, a review of previously identified cultural resources, a review of historical maps and aerial imagery, and a pedestrian survey of the project area. The effort failed to identify any previously reported archaeological sites within or in close proximity to the Area of Potential Effect (APE) for the project. However, a property listed on the State Register of Historic Places (South Farms) and two properties (Old Town Hall and the Mill School) listed on the National Register of Historic Places (NRHP) were recorded within a half mile of the proposed project area. The report concluded that none of the previously identified cultural resources will be impacted by the proposed solar development.

During survey, 118 planned shovel tests were completed at 30-meter intervals along transects placed 30 meters apart. A total of 56 shovel tests positive for cultural material were recorded. Precontact cultural material was recorded within 22 shovel tests while Postcontact material was recorded in 43 shovel tests. An additional 46 delineation shovel tests were completed to further investigate identified deposits. The field effort resulted in the identification of two Precontact sites (Site 1 and Site 2) as well as a diffuse scatter of Postcontact cultural material covering the majority of the APE. A total of 88 Postcontact Period artifacts were recovered and included 59 domestic ceramic sherds, four ferrous metal fragments, 24 glass shards, and a fragment of calcined mammal bone. Heritage determined that the Postcontact

deposits were representative of typical field scatter and were not eligible for inclusion on the NRHP. Precontact material recovered from Site 1 consisted of five quartz flakes, two utilized quartz flakes, a quartz scraper, a quartz spokeshave, and a quartz core from a plowzone context. Excavation of Site 2 resulted in the recovery of 20 quartz flakes, three quartz bifaces, a quartz core, a quartz end scraper, three chert flakes, a hornfels flake, and an argillite flake.

Following completion of the initial survey, a stormwater detention structure area was added to the scope of the project. An additional archaeological reconnaissance survey was completed by Heritage within the location of the proposed stormwater detention structure as well as around Site 1 to further refine the context and included the excavation of 22 additional shovel tests. The effort failed to produce evidence of additional cultural material or features. Heritage concluded that Site 1 lacked research potential and overall integrity. As a result, the report recommended that Site 1 was not eligible for listing on the NRHP. As noted in the request for review, the project proponents have altered their scope to employ an above-ground ballasted system to anchor the array within the Site 2 area. Therefore, the project will avoid impacts to the identified, potentially NRHP eligible archaeological deposits associated with Site 2. In addition, Heritage noted the presence six stone wall fragments within the APE. SHPO recommends avoidance of impacts to the identified stone walls to the greatest extent possible. With the noted adjustments to project plans implemented, it is the opinion that there will be no adverse effect to Site 2 by the proposed solar development. Finally, this office requests two bound copies of the final reports; one will be kept for use in the office and the other will be transferred to the Dodd Research Center in Storrs for permanent archiving and accessibility.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's archeological resources. Do not hesitate to contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, for additional information at (860) 500-2458 or cory.atkinson@ct.gov.

Sincerely,



Jonathan Kinney
State Historic Preservation Officer