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April 14, 2026

**Via FedEx and Electronic Mail (Melanie.Bachman@ct.gov)**

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

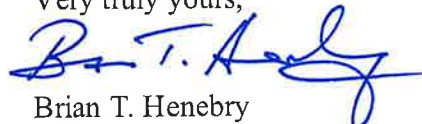
**Re: Petition No. 1701: Shepaug LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 1.99-megawatt AC solar photovoltaic electric generating facility and associated equipment located adjacent to FirstLight Power, Inc.'s Shepaug Generating Station, 2225 River Road, Southbury, Connecticut, and associated electrical interconnection.**

Dear Attorney Bachman:

I am writing on behalf of Shepaug LLC (the "Petitioner") to supplement the Petitioner's responses to the Connecticut Siting Council's Interrogatories, which we filed on April 9, 2026. In response to Interrogatory #45 seeking a copy of the determination letter from the State Historic Preservation Office (SHPO), we indicated that the Petitioner had not yet received the SHPO determination letter.

The Petitioner received the SHPO "no effect" determination letter on April 10, 2026. We hereby submit to the Connecticut Siting Council an original and fifteen (15) copies of the determination letter. An electronic copy is also being submitted. Please contact me if you have any questions regarding this submission.

Very truly yours,

  
Brian T. Henebry

Enclosures

cc: Service List

**LIST OF PARTIES AND INTERVENORS  
SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<p><b>Petitioner</b></p>	<p><input checked="" type="checkbox"/> E-mail</p>	<p>Shepaug LLC</p>	<p>Brian T. Henebry, Esq.                      Janie L. McDermott, Esq.                      Carmody Torrance Sandak &amp; Hennessey LLP                      50 Leavenworth Street                      Waterbury, CT 06702                      (203) 573-1200  <a href="mailto:bhenebry@carmodylaw.com">bhenebry@carmodylaw.com</a>  <a href="mailto:jmcdermott@carmodylaw.com">jmcdermott@carmodylaw.com</a></p> <p>Tory Hanna                      Davis Hill Development LLC                      105 Prospect St.                      Greenwich, CT 06830                      (413) 522-7460  <a href="mailto:tory.hanna@dhd solar.com">tory.hanna@dhd solar.com</a></p> <p>Sandra Brown                      FirstLight Energy                      100 District Avenue, Suite 102                      Burlington, MA 01803                      (404) 695-0555  <a href="mailto:Sandra.Brown@firstlight.energy">Sandra.Brown@firstlight.energy</a></p> <p>Michael Libertine                      All-Points Technology Corporation, P.C.                      567 Vauxhall Street Ext.                      Suite 311                      Waterford, CT 06385                      (860) 552-2238  <a href="mailto:mibertine@allpointstech.com">mibertine@allpointstech.com</a></p>

April 10, 2026

Mr. David R. George  
Heritage Consultants  
830 Berlin Turnpike  
Berlin, CT 06037

Subject: Phase IA and IB Cultural Resource Reconnaissance Survey  
Firstlight Shepaug Solar Project  
2225 River Road  
Southbury, Connecticut  
48054

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the archeological survey report prepared by Heritage Consultants, LLC (Heritage), dated October 2025. 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 solar facility, which is to occupy an approximately 11.5 acre project area, with a larger 125.6 acre parcel, located at 2225 River Road, and is bounded by the Housatonic River to the west and south, east by Comsat and Mitchell Farm, and north by George Waldo State Park. Access to the facility is to be from River Road. The submitted report is well-written, comprehensive, and meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

Eleven previously recorded archaeological sites are located within 1 mile of the project area; however, they will not be impacted by the proposed action. Though Site 130-20 is close to the Project Area, it is presumed to have been inundated by the formation of Lake Lilinoah. Two properties (John Glover House NR# 01000882, Little Pootatuck Brook Archeological Site NR# 90000980) listed on National Register of Historic Places are located within 1 mile of the project area; however, distance and varying topography will prevent the facility from being visible from either resource; neither will be impacted by the proposed project.

The Phase IA portion of the survey consisted of a contextual overview of the region's precontact era Native American, post-European Contact period, and natural settings; a literature search to identify and discuss previously recorded cultural resources in the region encompassing the Project parcel; a review of readily available maps and aerial imagery

depicting the Project parcel in order to identify potential post-European Contact resources and/or previous disturbances; and pedestrian survey and photo-documentation of the Project parcel in order to determine its archaeological sensitivity. The Phase IA revealed that approximately 10.4 acres of the project area retained moderate archaeological sensitivity. Additionally, 15 cultural features were identified during the pedestrian survey, including stone walls and an oval mound; this office concurs with the recommendation that the walls, to the extent practicable, only be breached within the Project area and that those located outside the Project area be left in place, their location be noted on construction maps, and that they be marked with high visibility fencing in the field so they may be avoided during construction.

Phase IB of the reconnaissance survey consisted of subsurface testing of the areas determined to have moderate to high archaeological sensitivity. A total of 102 of 104 planned shovel tests were excavated successfully throughout the proposed work area. 13 additional shovel tests, and 1 judgmental shovel test were also excavated. Three historic period artifacts, three glass shards, were recovered from two shovel test puts, dating from the late 19<sup>th</sup> to early 20<sup>th</sup> century, and not eligible for listing on the National Register of Historic Places applying the criteria for evaluation (36 CFR 60.4 [a-d]). No other cultural features or materials from either historic or prehistoric periods were identified.

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 and that no historic properties will be affected by the proposed activities. However, please be advised that if construction plans change to include previously uninvestigated/undisturbed areas, this office should be contacted for additional consultation.

This office appreciates the opportunity to review and comment upon this project. For additional information, please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or [marena.wisniewski@ct.gov](mailto:marena.wisniewski@ct.gov).

Sincerely,



Jonathan Kinney  
State Historic Preservation Officer