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October 26, 2015

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Mr. Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1181 – SolarCity Corporation petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction and operation of a 4.93 Megawatt Community Shared Solar Photovoltaic Electric Generating facility located at 9 Stott Avenue and 292 Plain Hill Road, Norwich, Connecticut -- Cultural Resources Reconnaissance Survey

Dear Chairman Stein:

On behalf of SolarCity Corporation ("SolarCity"), enclosed are sixteen (16) copies of the Cultural Resources Reconnaissance Survey for the proposed Facility. This document has also been submitted to the Connecticut State Historical Preservation Office.

Please contact me at 860-509-6575 with any questions or if you need additional information.

Very truly yours,

BROWN RUDNICK LLP

By: _____
Philip M. Small
Counsel for SolarCity Corporation

PMS/jmb
Enclosure

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HERITAGE
CONSULTANTS, LLC

INTEGRATED HISTORIC PRESERVATION PLANNING

October 22, 2015

Mr. Michael Singer
Brightfields Development, LLC
40 Walnut Street, Suite 301
Wellesley, MA 02481

RE: End-of-Fieldwork Management Summary for Phase I Cultural Resources Reconnaissance Survey of a Proposed Solar Voltaic System Project a 9 Stott Avenue and 292 Plain Hill Road in Norwich, Connecticut.

Mr. Singer:

This letter summarizes the results of a Phase I cultural resources reconnaissance survey of the above-referenced project parcel in Norwich, Connecticut (Figure 1 and 2). This project was completed on behalf of Brightfields Development, LLC during October of 2015 by Heritage Consultants, LLC. All work associated with this undertaking was performed 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 End-of-Fieldwork Management Summary presents descriptions of the Area of Potential Effect, the methods by which the Phase I cultural resources reconnaissance survey was completed, the results of the field effort, and management recommendations for identified cultural resources.

Project Description
The Area of Potential Effect associated with this undertaking measures approximately 15 ac in size and is located at the intersection of 9 Stott Avenue and 292 Plain Hill Road in Norwich, Connecticut (Figure 1). Construction plans for the development of the proposed project parcel include the installation of a solar voltaic system, a gravel access road, fencing, and an electrical easement to the City of Norwich (see Figure 2). The Area of Potential Effect is characterized by rolling topography and well-drained soils. At the time of survey, the project parcel consisted of a two large fallow agricultural fields separated by a treeline area containing wetlands soils and an overgrown field in the northwest (Figure 3 through 6). The remainder of this document discusses the methods by which the current Phase I survey was completed, as well as the results of the field effort.

Background Research
This comprehensive Phase I cultural resources reconnaissance survey was completed using a three-step approach. The first step consisted of a literature search and records review that focused on the portion of Norwich encompassing proposed project parcel. This was followed by the identification of all previously recorded archeological sites situated within the vicinity of the Area of Potential Effect. Finally, the project approach entailed the completion of the current Phase I cultural resources reconnaissance survey.

Background research included analysis of readily available historic maps and aerial imagery depicting the Area of Potential Effect; an examination of the pertinent 1983 USGS 7.5' series topographic quadrangle; and a review of all archeological and National Register data maintained by the Connecticut State Historic

Preservation Office and in digital records archived by Heritage Consultants, LLC. The intent of this review was to identify all previously recorded cultural resources situated within the vicinity of the proposed project parcel. This information was used to develop the archeological context for assessing any cultural resources that may be identified during survey. This information also was used to identify and implement survey methods and techniques appropriate for evaluating the National Register significance of each archeological site that may be identified during the execution of the subsequent Phase I cultural resources reconnaissance survey.

Field Methods

Following the completion of all background research, the Area of Potential Effect was subjected to a Phase I cultural resources reconnaissance survey utilizing pedestrian survey, systematic shovel testing along survey transects, detailed mapping, and photo-documentation. The pedestrian survey portion of this investigation included visual reconnaissance of all areas scheduled for impacts by the development project. In addition, systematic subsurface testing was completed throughout the apparently undisturbed portions of the project parcel. This portion of the investigation involved the systematic excavation of shovel tests along 13 survey transects (Figure 2). Shovel tests positioned along the parallel transects were excavated at 15 m (49.2 ft) intervals.

During survey, each shovel test measured 50 cm (19.7 in) in size and each was excavated to a depth of 50 cmbs (19.7 inbs) or until sterile subsoil or immovable objects were encountered. Each shovel test was excavated in 10 cm (3.9 in) arbitrary levels within natural strata, and the fill from each level was screened separately. All shovel test fill was screened through 0.635 cm (0.25 in) hardware cloth and examined visually for cultural material. Soil characteristics were recorded using Munsell Soil Color Charts and standard soils nomenclature. Each shovel test was backfilled immediately upon completion of the archeological recordation process.

Curation

Following the completion and acceptance of the Final Report of Investigations, all cultural material, drawings, maps, photographs, and field notes will be curated with Dr. Brian Jones, Office of Connecticut State Archaeology, Box U-1023, University of Connecticut, Storrs, Connecticut 06269.

Results of the Investigation

During survey, 145 or 159 (91 percent) planned shovel tests were excavated successfully throughout the undisturbed portions proposed project parcel. The 14 planned but unexcavated shovel tests fell along the southwestern portion of the proposed project parcel; they were not excavated because much of the soil in this area was eroded down to glacial till and/or bedrock. Further, no shovel tests were excavated in the northern and northwestern-most portions of the proposed project because the landowner informed representatives of Heritage Consultants, LLC that those areas had been excavated down several feet approximately 50 years ago, and that portions of the bedrock in those areas were removed using dynamite. Thus, these two portions of the project parcel have been severely disturbed in the past and no longer retain any potential to yield intact cultural deposits.

During survey, it was noted that two soil strata were represented throughout the Area of Potential Effect. Stratum I, which extended from the surface to approximately 30 cmbs (12 inbs), consisted of a layer of brown (10YR 4/3) sandy loam; this layer comprised a plowzone deposit resulting from centuries of agricultural use of the Area of Potential Effect. Stratum II, which reached from the base of Stratum I to a depth of 50 cmbs (20 inbs), was described as a deposit of yellowish brown (10YR 5/6) sandy clay loam containing moderate to large amounts of gravel and large rocks; it represented the very base of the former subsoil deposit. The excavation of the survey shovel tests clearly documented that the entire project parcel has been plowed down to the top of the glacial till deposits, and it no longer contains an intact subsoil

component. Finally, despite this testing effort, no cultural material or indications of cultural features were identified.

Base on the heavily disturbed nature of the project parcel and the lack of any intact soils in the areas, it is the professional opinion of Heritage Consultants, LLC that construction of the proposed project will have no adverse effect on cultural resources. If you have any questions regarding this End-of-Fieldwork management summary, or if we may be of additional assistance with this or any other projects you may have, please do not hesitate to call us at 860-667-3001 or email me dgeorge@heritage-consultants.com. We are at your service.

Sincerely,

Nicholas Griffis, M.A.
Heritage Consultants, LLC

REFERENCES CITED

Poirier, D.A.
1987 *Environmental Review Primer for Connecticut's Archaeological Resources.* Connecticut Historical Commission, State Historic Preservation Office, Hartford, Connecticut.

Figure 1. Aerial view of the proposed project parcel and surrounding region in Norwich.

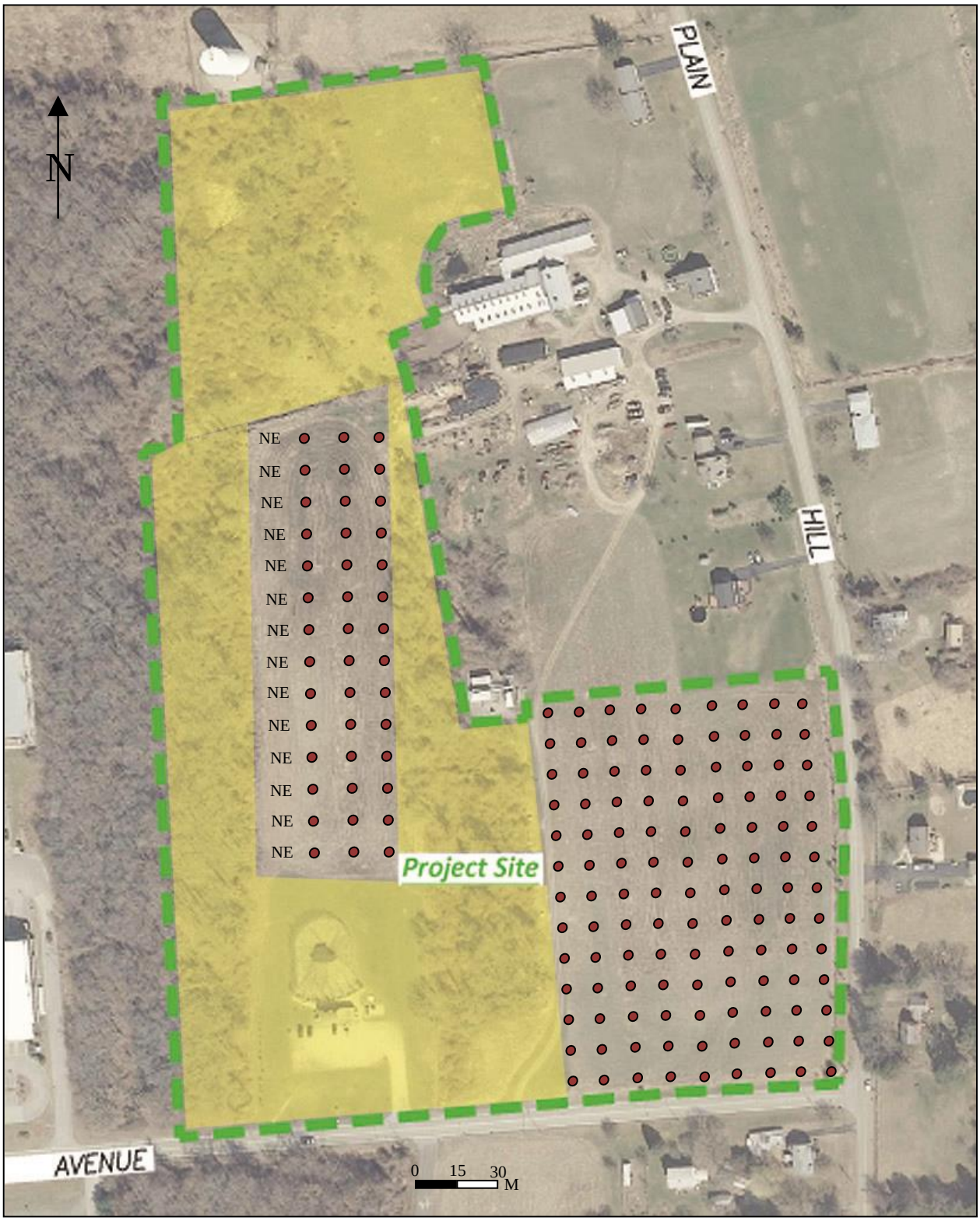

Figure 2. Plan view of the proposed project area showing local landscape features and shovel test (note areas shown in yellow have been heavily disturbed, are wet, or contain moderate to steep slopes).

Figure 3. Overview phot of the western portion of the proposed project area facing south.

Figure 4. Overview photo of the eastern portion of the proposed project area facing south.

Figure 5. Overview photo of the central portion proposed project area facing north (note large piles of rock in this area from field clearing).

Figure 6. Overview photo of the northern portion proposed project area facing south (the landowner indicated that this entire area had been excavated and disturbed 50 years ago).