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November 25, 2015

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

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

***Re: Petition No. 1195 - 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 4.05
Megawatt Community Shared Solar Photovoltaic Electric Generating
facility located on municipally-owned property at 1240 Poquonock
Road, Groton, 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

62250161 v1-WorksiteUS-031819/0001



INTEGRATED HISTORIC PRESERVATION PLANNING

November 19, 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 at 1240 Poquonnock Road in Groton, Connecticut.

Mr. Singer:

This letter summarizes the results of a Phase I cultural resources reconnaissance survey of the above-referenced project in Groton, Connecticut (Figure 1 and Photos 1 through 4). This project was completed on behalf of Brightfields Development, LLC in 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 Areas 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 Areas of Potential Effect associated with this undertaking are located to the east of Groton Reservoir and to the north of Poquonnock Road in Groton, Connecticut (Figure 1). They are situated at elevations ranging from 7.3 to 9/1 m (24 to 30 ft) NGVD. Construction plans for the development of the area include the installation of two solar voltaic systems to be built on two separate mounting planes. Mounting plane 1 will be located along the eastern shoreline of the reservoir, while Mounting plane 2 will be situated to the east and on the opposite side of a gravel road that separates the two mounting plane areas (see Figure 1; Photos 1 through 4). The Areas of Potential Effect are characterized by rolling level terrain and well-drained soils. 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 items. 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 area. 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 mounting plane areas were subjected to a Phase I cultural resources reconnaissance survey utilizing pedestrian survey, systematic shovel testing along survey transects in undisturbed areas, 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 undisturbed portions of the project area. This portion of the investigation involved the systematic excavation of shovel tests along 40 parallel survey transects situated throughout with Mounting planes 1 and six parallel survey transects within the Mounting plane 2 area (Figure 1). 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, 221 of 221 (100 percent) planned shovel tests were excavated successfully throughout the Mounting plane 1 area, while 47 of 47 (100 percent) planned shovel tests were positioned within the Mounting plane 2 area. During survey, it was noted that two soil strata were represented throughout the survey areas. Stratum I, which extended from the surface to approximately 25 cmbs (9.8 inbs), consisted of a layer of dark brown (10YR 3/3) 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 (19.7 inbs), was described as a deposit of yellowish brown (10YR 5/6) sandy loam containing minor amounts of pebbles and small stones. While shovel testing in the Mounting plane 2 area failed to identify any cultural deposits, a small locus of prehistoric artifacts was identified within the Mounting plane 1 area. Cultural material recovered from Locus 1 consisted of a single brick fragment, 1 quartzite flake, 1 chert flake, and a single quartz Narrow-Stemmed projectile point. All of these items were collected from the disturbed plowzone deposit.

The Locus 1 area described above roughly correlates with the location of previously identified Site 59-14. This site was originally identified by Kathryn Hoy based on an informant interview with a local game warden, who collected quartz bifaces and a single chert Narrow-Stemmed projectile point from the location. While the site location as plotted on the submitted site form is located slightly to the north, it is most likely plotted in error since no artifacts were found in that location during the current investigation. Locus 1, also

known as Site 59-14 consisted of a previously disturbed archaeological deposit and it no longer retains research potential or the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No addition archaeological testing of Locus 1 (Site 59-14) is recommended, and it is the professional opinion of Heritage Consultants, LLC that the proposed construction project will have no impact 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 info@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. Plan view of the proposed project areas located at 1240 Poquonnock Road in Groton, Connecticut



Photo 1. Overview photo of the Mounting plane 1 area facing north.



Photo 2. Overview photo of the Mounting plane 1 area facing southwest.



Photo 3. Overview photo of the Mounting plane 2 area facing west.



Photo 4. Overview photo of the Mounting plane 2 area facing southwest.