



20 Church Street
20th Floor
Hartford, CT 06103
Telephone: 860-525-5065
Fax: 860-527-4198
www.lockelord.com

Kathryn E. Boucher
Direct Telephone: 860-541-7714
Direct Fax: 860-955-1145
kathryn.boucher@lockelord.com

January 10, 2020

Via Electronic Mail and First Class Mail

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

RE: ***Petition No. 1310A*** – Quinebaug 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 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b)

Dear Ms. Bachman:

On behalf of the petitioner, Quinebaug Solar, LLC, enclosed please find an original and 15 copies of correspondence from the State Historic Preservation Office related to the Quinebaug Solar Project.

Please feel free to contact David Bogan of this office (860-541-7711) or me if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Kate Boucher".

Kathryn E. Boucher

Enclosures

cc: Service List



Department of Economic and
Community Development

State Historic Preservation Office

January 9, 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
Site 22-38 (Locus 2-1) and Sire 19-35 (Locus 11-1)
Quinebaug Solar
Booklyn and Canterbury, Connecticut
ENV-20-0320

Dear Mr. George:

The State Historic Preservation Office (SHPO) has reviewed the archeological survey report prepared by Heritage Consultants, LLC (Heritage), dated November 2019. 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 a 50MWac solar photovoltaic (PV) electric generating facility, to interconnect with the Eversource Energy electrical grid through Line 1607-1505, located approximately 1,500 feet west of the Quinebaug River. The facility is to occupy approximately 226.5 acres of a 556.2 acre study area, bordered by Allen Hill Road and forested areas to the north, to the south by Wauregan Road, to the east by the Quinebaug River, and to the west by Blackwell Brook. The central and western portion of the study area, which contain active sand and gravel pits, will not be developed as part of the undertaking. A central gravel area is proposed to be used as a temporary laydown/staging area, while an existing access road is proposed to be utilized during construction and facility maintenance. The submitted report is well-written, comprehensive, and meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

SHPO would like to affirm and clarify previous recommendations made during the Phase IA investigations. An historic wellhouse, the Rukstella farmstead, the Harris/Butts/Cady Farmstead, and nine of 12 recorded stone wall segments were identified and evaluated during these

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investigations. None of these resources are considered eligible for listing on the National Register of Historic Places (NRHP) as either individual or contributing resources applying the criteria for evaluation (36 CFR 60.4). No additional documentation of these resources is warranted. In addition to these historic resources, the Bennett/Gallagher/Taylor cemetery with two wall segments, a stone town boundary marker with stone wall segment, and the Mowrey farmstead were also recorded. SHPO recommends that the Bennett/Gallagher/Taylor cemetery should be protected with a 50 foot buffer extending from its exterior wall. SHPO understands that the two wall segments that connect to the cemetery must be breached for construction access. SHPO recommends that these wall segments not be breached within the 50 foot buffer of the cemetery. Similarly, the historic town boundary monument should be preserved in place and protected with a 100 foot buffer area to include the stone wall segment connected to it, as well as a historic archaeological site subsequently identified in its vicinity (Locus 12-1, see below). The buffered areas for the monument, cemetery, and stone wall segments should be clearly marked on project construction maps as sensitive resource areas and protected in the field during construction with fencing to ensure that there are no inadvertent impacts. SHPO requests that areas to be breached in the walls extending from the cemetery also be clearly marked on project maps and in the field so that construction crews can minimize harm to only what is needed to complete the project. Lastly, the Mowrey farmstead represents a well preserved example of early historic settlement of the region. SHPO affirms its appreciation for avoiding this potentially significant resource. If project plans change to include impacts within the site area, we request additional consultation.

In addition to the resources identified during the previously reviewed Phase IA survey, a total of 32 archaeological resources were recorded during the subsequent Phase IB survey. SHPO concurs that 26 of the newly recorded archaeological loci do not retain the qualities essential to listing on the NRHP. No further archeological investigation of these loci (Loci 4-2, 5-1, 7-1, 8-1, 8-2, 8-3, 8-4, 8-5, 9-1, 13-1, 15-1, 16-1, 16-2, 16-3, 16-4, 16-5, 17-1, 18-1, 18-2, 19-1, 19-2, 20-1, 20-2, 21-1, 23-1, and 24-1) is recommended. Of the six remaining archaeological resources, four (Locus 12-1, Site 22-36, Site 19-34, and Site 19-8) could be protected from project impacts and were not subject to a formal evaluation, but are considered potentially eligible for listing on the NRHP. Locus 12-1, an intact late 18th to early 19th century domestic site, will be avoided within the 100 foot buffer established above for the historic boundary marker. The site boundaries reported for pre-contact Sites 22-36 (Locus 4-1), 19-34 (Locus 6-1), and 19-8 (Locus 25-1) should be buffered by 50 feet and depicted on construction maps as sensitive resource areas to be avoided. Because Site 19-8 is located in an open field and not easily discernable on the ground, SHPO requests that fencing be erected prior to construction activities and under the guidance of the project archaeologist to protect the site from unintentional impacts. Sites 22-36

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and 19-34 do not require fencing because they are located a sufficient distance from project development areas and are naturally protected within forested areas.

Project impacts could not be as easily avoided for the two remaining archaeological sites (Sites 19-35 and 22-38); therefore, they were subjected to Phase II investigations to better understand the nature and distribution of cultural material. The intensive testing process at Site 19-35 (Locus 11-1) also included mechanical stripping. SHPO appreciates this additional effort to ensure that significant cultural features were not overlooked. Despite the identification and recovery of cultural features and diagnostic artifacts, it was demonstrated that the majority of Site 19-35 (Locus 11-1) exhibited integrity issues related to plowing, erosion, and nearby gravel mining that diminished the research potential of the site. Based on the information provided to our office, SHPO concurs that archaeological Site 19-35 is not eligible for listing on the NRHP and no additional testing of it is needed. SHPO has no objection to project development at this location. Site 22-38, however, yielded a diverse artifact assemblage and a variety of feature types derived from primarily intact deposits. Site 22-38 retains significant research potential relating to the Middle and Late Archaic and SHPO concurs that this site is eligible for listing on the NRHP. SHPO has reviewed the plan to avoid/minimize harm to the site; it consists of recommendations for tree removal and the creation of exclusion areas. As recommended, tree removal should be restricted to a time when the ground is stable, preferably frozen, to reduce the possibility of rutting. Trees should be cut in place without grubbing or grinding of the stumps. SHPO further recommends that vehicles used at this location should be fitted with low ground-pressure tires and/or the ground should be protected with matting or padding to avoid impacts. SHPO notes that there is disagreement, however, between the verbally described exclusion areas discussed in Volume I of the report and the areas depicted on Figure 154. SHPO concurs that, as depicted on Figure 154, impacts to the significant portion of Cluster 2, dating from the Middle Archaic, within Site 22-38 would be avoided by creating a 25 foot buffered exclusion area around the confluence of Excavation Units 1, 3, and 24. SHPO, however, requests that the exclusion area for the western part of Site 22-38, containing significant deposits dating from the Late Archaic, depicted on Figure 154 be revised to reflect the findings depicted on Figure 86. The Cluster 1 boundary on Figure 86 should also be buffered by 25 feet and identified as the exclusion area to avoid impacts to Site 22-38. The exclusion areas should be marked on construction maps as sensitive resource areas to be avoided and fencing should be erected at the buffered perimeter in consultation with the project archaeologist to prevent unintended intrusions into this significant archaeological resource.

SHPO does not want a new printing of the submitted report, but requests corrections to two pages. The second paragraph on Page 114 of Volume I begins, "Site 22-28 (Locus 21)." It should be correct to, 'Site 22-38 (Locus 2-1).' In addition, Figure 154 should be revised to accurately



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reflect the exclusion areas described in the report. Finally, SHPO acknowledges that there was a comprehensive effort made to relocate six previously record sites (19-2, 19-8, 19-9, 19-11, 19-15, and 19-16). Site 19-8 was relocated and will be avoided as described above, but no evidence of the five remaining sites was recovered.

If all of the recommendations can be taken into consideration, SHPO is of the opinion that the project will have no adverse effect on historic properties. Should construction plans change such that they would impact identified significant resources that are being avoided or, if any of the recommendations above cannot be implemented, this office requests additional consultation.

SHPO appreciates the cooperation of all interested parties in the professional management of Connecticut's cultural resources. We look forward to additional consultation if or when additional portions of the parcel are scheduled for development. 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

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