October 26, 2017

Connecticut Department of Economic and Community Development
State Historic Preservation Office
450 Columbus Blvd.
Suite 5
Hartford, CT 06103
Attn: Ms. Marena Wisniewski

Re: Candlewood Solar LLC
20 MW Solar Photovoltaic Project
New Milford Assessor Map parcels 26/67.1, 9/6, and 34/31.1
Candlewood Mountain Road, New Milford, Connecticut
Phase IB Cultural Resources Reconnaissance Survey

Dear Ms. Wisniewski:

As requested in the State Historic Preservation Office's (SHPO) letter dated June 21, 2017 regarding review of the above referenced project, a professional cultural resources assessment and reconnaissance survey was completed by Heritage Consultants LLC (Heritage) for the proposed Project. Two (2) copies of the Phase IA professional cultural resources assessment and reconnaissance survey report (Phase IA Report) which documents the results of the assessment and survey were filed with SHPO on September 18, 2017.

The Phase IA Report recommended Phase IB cultural resources reconnaissance, using subsurface testing techniques, of approximately 35 acres within the central portion of the Solar Array layout. Heritage completed Phase IB subsurface testing of the approximate 35 acre Solar Array area and an approximate 5 acre hay/horse pasture located along Candlewood Mountain Road in September and October 2017.

Enclosed please find two (2) copies of the Phase IB cultural resources reconnaissance survey report (Phase IB Report) which documents the result of a Phase IB cultural resources reconnaissance survey of the moderate/high archaeologically sensitive areas associated with the proposed Project. The following discussion summarizes the findings and recommendations of the Phase IB Report:

- **Area 1.** Area 1 is situated in the northernmost portion of the proposed project parcel associated with the solar facility. It is situated at approximate elevations ranging from 220 to 280 m (720 to 920 ft) NGVD. The area is heavily wooded with relatively young trees consisting mainly of oak, maple and beech. Natural outcrops of stone are visible in various places throughout the area, as are several stonewall segments. The central portion of Area 1 is generally level but slopes downward to the west and east. The northernmost area of Area 1 slopes steeply upward toward the top of Candlewood Mountain. Phase IB shovel testing of Area 1 was focused on the flat, well drained areas. Soils in Area 1 are described

Amec Foster Wheeler
Environment & Infrastructure, Inc.
271 Mill Road, 3rd Floor
Chelmsford, MA 01824
+1 978-692-9090
amecfw.com

artifacts or cultural features were found in association with the above-referenced lithic flake. As a result, it was determined that Locus 3 lacks research potential and the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No additional archaeological examination of Locus 3 is recommended prior to construction of the proposed solar array facility.

Locus 4 was identified in the northwestern portion of Area 3 at an approximate elevation of 246.9 m (790 ft) NGVD. At the time of survey, this area, like Locus 3, was situated within a large open field covered with grass. Phase IB survey of the Locus 4 area resulted in the recovery of a single chert thinning flake and 1 large piece of chert shatter. These artifacts were recovered from the plowzone at a depth of 10 to 20 cmbs (3.9 to 7.9 inbs). Despite the field effort undertaken throughout the Locus 4 area, no additional artifacts or cultural features were found in association with the above-referenced lithic flake. As a result, it was determined that Locus 4 lacks research potential and the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No additional archaeological examination of Locus 4 is recommended prior to construction of the proposed solar array facility.

Locus 5 also was identified in the northwestern portion of Area 3; it was recorded at an approximate elevation of 246.9 m (790 ft) NGVD. At the time of survey, this area was covered by mixed deciduous forest. Phase IB survey of the Locus 5 area resulted in the recovery of 3 plain whiteware sherds, all of which were collected from the base of the plowzone at 20 to 30 cmbs (7.9 to 11.9 inbs). Although additional delineation shovel tests were excavated within the Locus 5 area, no additional artifacts or evidence of historic architectural remains (e.g., stone foundations, wells, etc.) were found in association with the above-referenced whiteware sherds. Thus, it was determined that Locus 5 lacks research potential and the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No additional archaeological examination of this area recommended prior to construction of the proposed solar array facility.

Locus 6 was identified in the south-central portion of Area 3 at an approximate elevation of 243.8 m (800 ft) NGVD. At the time of survey, this area was situated within a large horse pasture covered with grass. Phase IB survey of the Locus 6 area resulted in the recovery of 3 clear lead glazed red earthenware body sherds and a single clear lead glazed red earthenware base sherd. All of these artifacts were recovered from the same shovel test at a depth of 10 to 20 cmbs (3.9 to 7.9 inbs). Despite the field effort undertaken throughout the Locus 6 area, no additional historic artifacts or buried architectural features were found in association with the above-referenced red earthenware sherds. As a result, it was determined that Locus 6 lacks research potential and the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No additional archaeological examination of Locus 6 is recommended prior to construction of the proposed solar array facility.

- **Area 4.** Area 4 is located in the southwestern portion of the project area at approximate elevations ranging from 213 to 216 m (700 to 710 ft) NGVD and will potentially be used during construction for parking and material and equipment storage. The area consists of a large open field currently used as pasturage. The field is bordered by Candlewood Mountain Road to the west and a drainage ditch to the east. The northern edge of the field runs parallel to the existing access road, while the western and southern edges of the field are bordered with stonewalls. This area is characterized by low slopes and sandy, well

drained soils. Excavation of the shovel tests within Area 4 made it clear that the existing plowzone deposit is resting immediately atop the glacially derived C-Horizon for the most part, indicating that no substantial amounts of intact soils remain in the area. However, shovel testing of Area 4 resulted in the identification of a single historic period locus. This area was designated as Locus 8.

Locus 8 was identified in the west-central portion of Area 4 at an approximate elevation of 216.4 m (710 ft) NGVD. Examination of the Locus 8 area resulted in the recovery of a single unidentified nail. This artifact was recovered from the plowzone at a depth of 10 to 20 cmbs (3.9 to 7.9 inbs). Despite the field effort undertaken throughout the Locus 8 area, no additional artifacts or cultural features were found in association with the above-referenced nail. As a result, it was determined that Locus 8 lacks research potential and the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). No additional archaeological examination of Locus 8 is recommended prior to usage of this area for temporary parking and material and equipment storage during project construction.

Since the commencement of the Phase IB cultural resources reconnaissance survey and subsurface testing, Candlewood Solar has made revisions to the site plan layout (see Attachment 1, Figures 1 and 2). Revisions to the site plan include avoidance of the Locus 7 area of archaeological sensitivity and a buffer of approximately 69 feet that will separate the limit of work (LOW) / limit of tree clearing and the area of archaeological sensitivity (see Attachment 1, Figure 3). The approximate 69 foot buffer between the LOW / limit of tree clearing and the area of archaeological sensitivity consists of mature forest. Additionally, the fence line that will completely surround the solar array facility is approximately 129 feet from Locus 7. The area between the LOW / limit of tree clearing and the fence line will be cleared of trees to eliminate shading, however, the stumps will not be removed in this area, further reducing potential impacts to Locus 7 from erosion.

Additionally, Candlewood Solar will implement the following avoidance and protection strategy for this area. An exclusion barrier consisting of standard silt fencing will be installed along the limit of work (LOW) after tree clearing activities, but prior to April 15th. Standard silt fencing was selected for erosion and sediment control purposes as well as for ecological reasons (species exclusion barrier). Orange snow fencing was considered, however, Connecticut Department of Energy & Environmental Protection Natural Diversity Data Base (CT DEEP NDDB) notes that plastic web or netted silt-fence should not be used as exclusionary fencing (CT DEEP NDDB letter dated July 10, 2017, Recommended Protection Strategies for Wood and Box Turtles).

Further, Candlewood Solar is proposing to set aside an approximate 100 acre area for permanent conservation restriction. The proposed 100 acre area includes Locus 7, providing further permanent protection of this resource (see Attachment 1, Figure 3).

Finally, it should be noted that no work (grading, etc.) to the hay/horse pasture (Area 4) would be required for construction parking and material/equipment storage, no additional tree clearing would be required for its use, and no alteration to existing stone walls would occur. The construction parking and staging area will only be used during construction of the Project and is temporary in nature. Upon completion of construction, the hay/horse pasture would be seeded/mulched as necessary and allowed to return to existing conditions.

All work was conducted in compliance with the *Environmental Review Primer for Connecticut's Archaeological Resources.*

Should you have any questions regarding the enclosed Phase IB cultural resources reconnaissance survey report or require any additional information, please do not hesitate to contact Ms. Tricia Foster at (978) 761-2450; tricia.foster@woodplc.com or Mr. Rob Bukowski at (978) 392-5307; rob.bukowski@woodplc.com. Thank you in advance for your assistance.

Sincerely,
Amec Foster Wheeler Environment & Infrastructure, Inc.

Tricia Foster
Senior 2 Planner

Rob Bukowski, PE
Project Manager

Attachments

cc: J. Lindsay, Candlewood Solar LLC
D. George, Heritage Consultants LLC