
APPENDIX L – CULTURAL RESOURCE CORRESPONDENCE

November 1, 2017

Ms. Lynn Gresock
Tetra Tech
2 Lan Drive, Suite 210
Westford, MA 01886

Subject: Wallingford Renewable Energy
Quinnipiac River and South Cherry Street
Wallingford, Connecticut

Dear Ms. Gresock:

The State Historic Preservation Office (SHPO) is in receipt of your request for our comments on the potential effects of the referenced project on historic properties. The request for comments is in support of a request for a Declaratory Ruling from the Connecticut Siting Council and is subject to the provisions of the Connecticut Environmental Policy Act. The proposed project consists of constructing a solar energy facility within a 250 parcel between the Quinnipiac River to the west and South Cherry Street to the east.

There are no properties listed on the National Register of Historic Places recorded within or immediately adjacent to the Area of Potential Effects (APE) for this project. The project area is considered to be archeologically sensitive with several previously recorded sites in their vicinity. As noted in your submission, however, it is unlikely intact archeological resources are located in the project areas because of prior disturbances related to multiple development projects (landfill, waste treatment facilities, pipelines, trailer park, etc.) or in wetland soils not favorable to human habitation. Based on the information provided to our office, no archeological investigations are warranted. It is SHPO's opinion that no historic properties will be affected by the proposed solar energy facility.

SHPO appreciates the opportunity to review and comment upon this project. For additional information, please contact me at (860) 500-2329 or catherine.labadia@ct.gov.

Sincerely,



Catherine Labadia
Deputy State Historic Preservation Officer



October 5, 2017

Catherine Labadia, Archaeologist
Department of Economic and Community Development
State Historic Preservation Office
450 Columbus Boulevard, Suite 5
Hartford, CT 06103

Subject: Wallingford Renewable Energy, Wallingford, Connecticut – Assessment of Cultural Resource Potential

Dear Ms. Labadia:

Tetra Tech, Inc. (Tetra Tech) is assisting Wallingford Renewable Energy, LLC (WRE) with environmental permitting for a proposed solar energy facility (the Project) located on approximately 250 acres (the Project Site) in Wallingford, Connecticut (Figure 1). WRE proposes to connect the solar energy facility to the regional electric grid via interconnection to existing electric distribution lines close to the Project Site or a dedicated distribution circuit back to the Wallingford substation within existing right-of-way. It is anticipated that wetland impact will be avoided and, thus, there will be no federal nexus. The Project will require a Declaratory Ruling from the Connecticut Siting Council (CSC), as well as other applicable state permits and review. Information regarding the Project's potential to impact historical and archaeological resources will be included in the petition for declaratory ruling that will be submitted to the CSC.

As shown on Figure 2, the Project Site is heavily disturbed. The Project Site contains a municipal capped landfill and an industrial capped landfill, two developed lots containing a parking lot and warehouse facilities with associated structures, a water treatment plant, and several cleared utilities easements for electric transmission lines, a gas pipeline, an oil pipeline, and water lines. In addition, the intervening land between the two landfills was formerly developed with a trailer park and several residential structures from the 1950s until the early 2000s, when the land was purchased to control and monitor landfill leachate plumes associated with the municipal landfill. Other portions of the Project Site may have also been influenced by former industrial uses and its industrial setting. Figure 2 also indicates areas of floodplain and wetland currently identified on the Project Site, which are areas unlikely to contain archaeological resources. Of the 250-acre site, approximately 64 percent consists of either areas of current or former development or wetland/floodplain; even more is likely to be influenced by these former and current uses.

A Tetra Tech staff archaeologist conducted a site file review of the proposed Project Site at the State Historic Preservation Office (SHPO) in Hartford, Connecticut, on October 3, 2017. The goal of the review was to identify previously reported archaeological sites and National Register of Historic Places (NRHP) properties located within a 1-mile radius (the Study Area) of the proposed Project Site. In addition, all survey reports of archaeological investigations previously conducted within the Study Area were reviewed for pertinent information.

The site file review identified no previously recorded archaeological sites, or NRHP-listed properties, located within the Project Site. The review identified nine previously recorded archaeological sites and five NRHP-listed properties outside the Project Site within the Study Area. Eight of the archaeological sites are Native American precontact sites, including lithic scatters, camps, and a possible village site. The remaining archaeological site is a historic period site which represents the remains of an eighteenth/nineteenth century

Tetra Tech, Inc.

2 Lan Drive, Suite 210, Westford, MA 01886
Tel 978.203.5352 Fax 978.692.4592 www.tetrattech.com

residential occupation. None of the nine archaeological sites have been evaluated for significance by SHPO. Table 1 provides pertinent information on the nine archaeological sites.

Table 1. Previously Recorded Archaeological Sites within the Study Area.

| SHPO Site # | Site Name | Site Type | NRHP Status | Site Integrity | Distance from Project (feet) |
|-------------|---------------|---|--|----------------|------------------------------|
| 101-25 | Defco II | Precontact village; Archaic/Woodland period | Unevaluated | Destroyed | 3,900 |
| 101-37 | RR Sand Pit | No information | Unevaluated | No information | 2,150 |
| 101-38 | Vermi/Mazzio | No information | Unevaluated | No information | 5,280 |
| 148-3 | Wilson 6B | Precontact camp; Early Archaic period | Unevaluated | Destroyed | 2,250 |
| 148-4 | Wharton Brook | Precontact village; Archaic/Woodland period | Unevaluated | Destroyed | 750 |
| 148-19 | -- | Historic residence; 18 th -19 th century | Recommended potentially eligible; unevaluated by SHPO | No information | 5,000 |
| 148-20 | -- | Precontact lithic scatter | Recommended potentially eligible; unevaluated by SHPO | Destroyed | 4,150 |
| 148-21 | -- | Precontact lithic scatter | Recommended not eligible; unevaluated by SHPO | No information | 3,625 |
| 148-22 | -- | Precontact camp; Late Archaic/Woodland period | Recommended potentially eligible; unevaluated by SHPO | Destroyed | 1,700 |

Five NRHP-listed properties occur within the Study Area (listed in Table 2). They represent colonial to nineteenth century structures, and include the Wallingford Center Historic District. Four of the NRHP-listed properties, including the Wallingford Center Historic District, are located in downtown Wallingford, approximately 5,000 feet (0.95 miles) northwest of the Project Site. The fifth NRHP-listed property is located approximately 2,800 feet (0.53 miles) west of the Project Site.

Table 2. NRHP-listed Properties within the Study Area.

| NRHP Property | NRHP # | Period of Significance |
|--|----------|------------------------|
| Center Street Cemetery | 97000833 | 1670-1949 |
| Franklin Johnson House | 98001420 | 1866-1899 |
| Theophilus Jones House | 91001981 | 1700-1949 |
| Samuel Parsons House | 82004358 | 1750-1799 |
| Wallingford Center Historical District | 93001242 | 1750-1949 |

The review identified four previously conducted archaeological surveys within the Study Area:

- The Environmental Archaeology Group (EAG) examined the 345-kilovolt (kV) electrical transmission line that traverses the Project Site and reported that the electric transmission line right-of-way was disturbed and exhibited low site integrity for potential archaeological sites (EAG 1988).
- Raber Associates also evaluated the 345-kV electric transmission line and identified no archaeological sites along the transmission line within the Project Site, but otherwise did not comment on the level of ground surface integrity or disturbance (Raber Associates 2004).
- The Connecticut Archaeological Survey (CAS) conducted a limited subsurface survey for the Wallingford Wastewater Treatment Plant, located adjacent to the north margin of the Project Site. The CAS recovered no cultural material and reported that the area was severely modified (CAS 1982).
- The Public Archaeology Lab (PAL) conducted survey for a proposed pipe yard located adjacent to the southern boundary of the Project Site along Toelles Road. PAL reported that, "because of

historic and more recent gravel operations and extreme land-stripping activities the area has been entirely altered and the site [Site 148-004] destroyed" (PAL 2004:116).

Based on the findings of severe ground disturbance in three of the four previously conducted archaeological surveys in the Project Site vicinity, and by the presence of landfills, developed tracts, utility rights-of-way, and floodplain/wetlands within the Project Site, Tetra Tech concludes that the potential is very low for the Project Site to contain previously undocumented archaeological sites that might be eligible for the NRHP. Tetra Tech, therefore, requests your confirmation that no further study is necessary and that impact to cultural resources is unlikely to result from the Project. Let me know if you have any questions or if I can provide additional information.

Sincerely,

Tetra Tech, Inc.



Lynn Gresock
Environmental Consultant

References Cited

Connecticut Archaeological Survey [CAS]

1982 *An Archaeological Survey of the Wallingford Wastewater Treatment Plan*. CAS Project No. 176. Prepared by the Connecticut Archaeological Survey, New Britain, CT.

Environmental Archaeology Group [EAG]

1988 Exhibits F-I thru F-IV for the Proposed Nortran Project, Vol. 2: Appendices. Prepared for Tennessee Gas Pipeline, Houston, TX. Prepared by the Environmental Archaeology Group, Boston, MA.

Graves, Anna K., William Brett, and Jeffrey D. Emidy

2004 *Historic Structures & Reconnaissance Archaeological Survey and Archaeological Intensive Surveys, Cedar Lake Road Site, Crave's Site and Farm River Site, Islander East Pipeline, Cheshire, Wallingford, North Haven, East haven, North Branford and Branford, Connecticut*. Prepared by Public Archaeology Lab (PAL), Pawtucket, RI.

Raber, Michael S., Stephen P. Carini, Marc L. Banks, Ernest A. Wiegand and Gifford Fogle

2013 *Archaeological Investigations Conducted in Response to the Connecticut Siting Council Docket 272 for the Middletown-Norwalk 345 kV Transmission Line Project, Scovill Rock Switching Station, Middletown, Connecticut to East Devon Substation, Milford, Connecticut*. Prepared by Raber Associates, Glastonbury, CT.



- Project Site
- River
- Highway
- Local Road

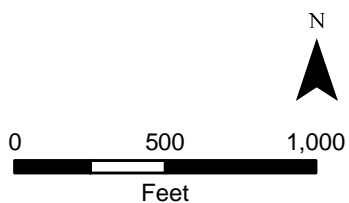
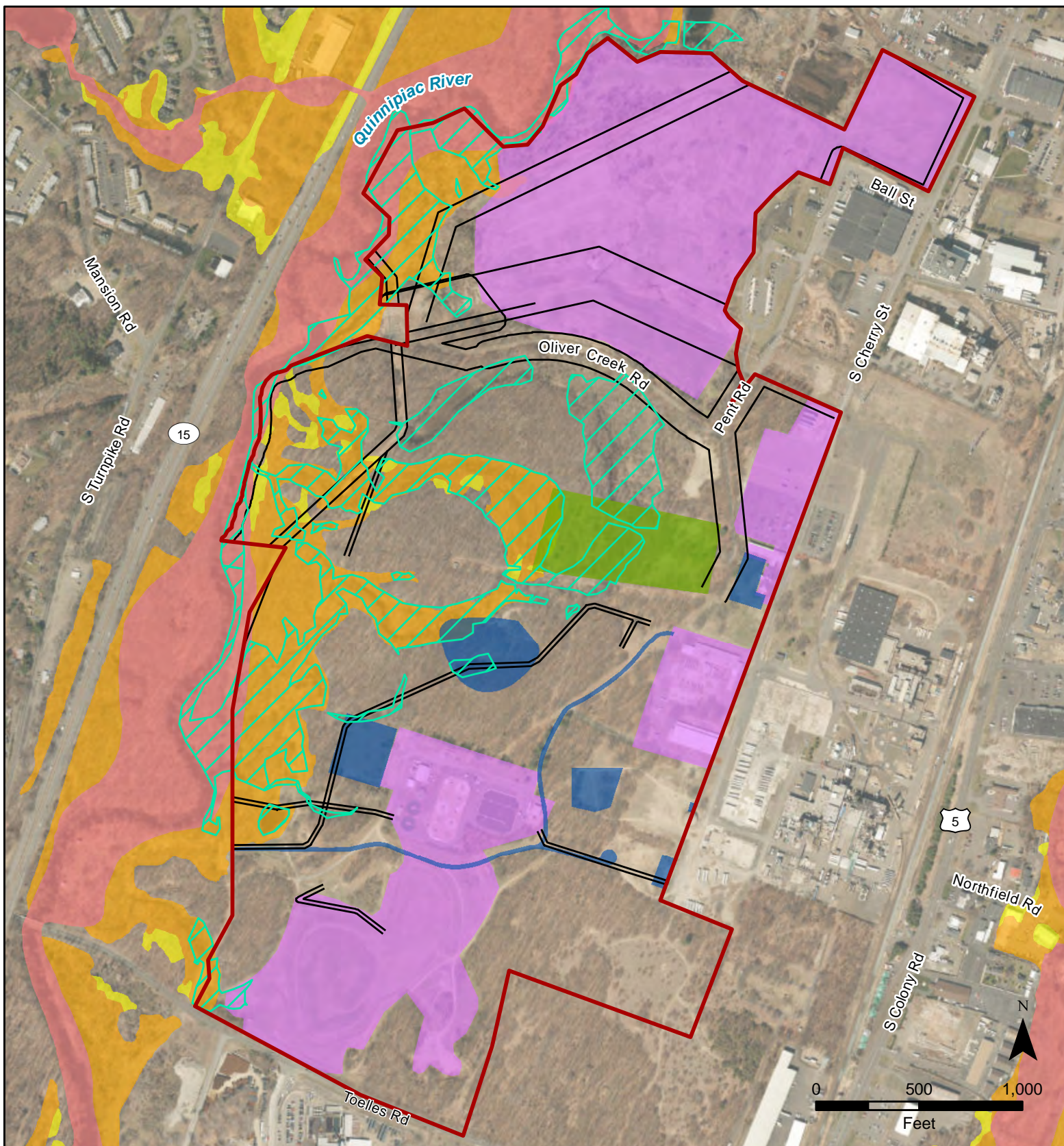


Figure 1
Project Site Location

Wallingford Renewable Energy Project
Wallingford, CT



- | | |
|---|---|
| Project Site | FEMA Flood Hazard Area |
| Rights-of-Way | Floodway |
| Delineated Wetland | 1% Annual Chance Flood |
| Industrial Developed Area | 0.2% Annual Chance Flood |
| Former Industrial Developed Area | |
| Former Trailer Park/Homes | |

Figure 2
Project Site Characteristics

Wallingford Renewable Energy Project
Wallingford, CT