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November 18, 2015

**VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY**

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

***Re: Petition No. 1192 – 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 2.74 Megawatt Community Shared Solar Photovoltaic Electric Generating facility located at two City of Norwich-owned parcels on Rogers Road, Norwich, Connecticut -- Cultural Resources Reconnaissance Survey***

Dear Chairman Stein:

Pursuant to Condition 1 of the Connecticut Siting Council's November 13, 2015 Decision Letter for Petition No. 1192, on behalf of SolarCity Corporation, 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

62231039 v1-WorksiteUS-031819/0001



## INTEGRATED HISTORIC PRESERVATION PLANNING

November 17, 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 82 Rogers Road in Norwich, Connecticut.**

Mr. Singer:

This letter summarizes the results of a Phase I cultural resources reconnaissance survey of the above-referenced project 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 is located on the north and south sides of Rogers Road in Norwich, Connecticut (Figure 1) at elevations ranging from 73 to 95 m (240 to 310 ft) NGVD. Construction plans for the development of the area include the installation of four associated solar voltaic systems to be built on four separate mounting planes. Mounting planes 2 and 3 are located on the north side of Rogers Road within a landfill area. Mounting planes 1 and 4 are to be built on the south side of Rogers Road in two fallow agricultural fields (see Figure 1; Photos 1 through 3). With the exception of the above-referenced landfill, the Area of Potential Effect is characterized by rolling topography 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 14 parallel survey transects situated throughout with Mounting planes 1 and 4 (Figure 2). Shovel tests positioned along the parallel transects were excavated at 15 m (49.2 ft) intervals. No shovel testing was completed in the areas associated with Mounting planes 2 and 3 since they were comprised of landfill deposits.

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, 84 of 84 (100 percent) planned shovel tests were excavated successfully throughout the Mounting plane 1 area. In addition, 14 of 14 (100 percent) planned were excavated throughout the Mounting plane 4 area. As mentioned above, no shovel tests were excavated in the Mounting plane 2 and 3 areas since they were characterized by landfill deposits.

During survey, it was noted that two soil strata were represented throughout the Mounting plane 1 and 4 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 4 area failed to identify any cultural deposits, a single historic artifact was recovered from the northeastern portion of the Mounting plane 1 area. This artifact consisted of a kaolin pipe stem fragment that was recovered from the plowzone deposit. This artifact, labeled as belonging to Locus 1, displays a very narrow bore diameter, suggesting that it likely dates from the nineteenth century. No other artifacts were recovered from Locus 1. Based on the data collected, Locus 1 consisted of a previously disturbed deposit and 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 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](mailto:info@heritage-consultants.com). We are at your service.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Griffis". The signature is fluid and cursive, with a large initial "N" and a stylized "G".

Nicholas Griffis, M.A.  
Heritage Consultants, LLC

## REFERENCES CITED

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- 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 items located along Rogers Road in Norwich, Connecticut.

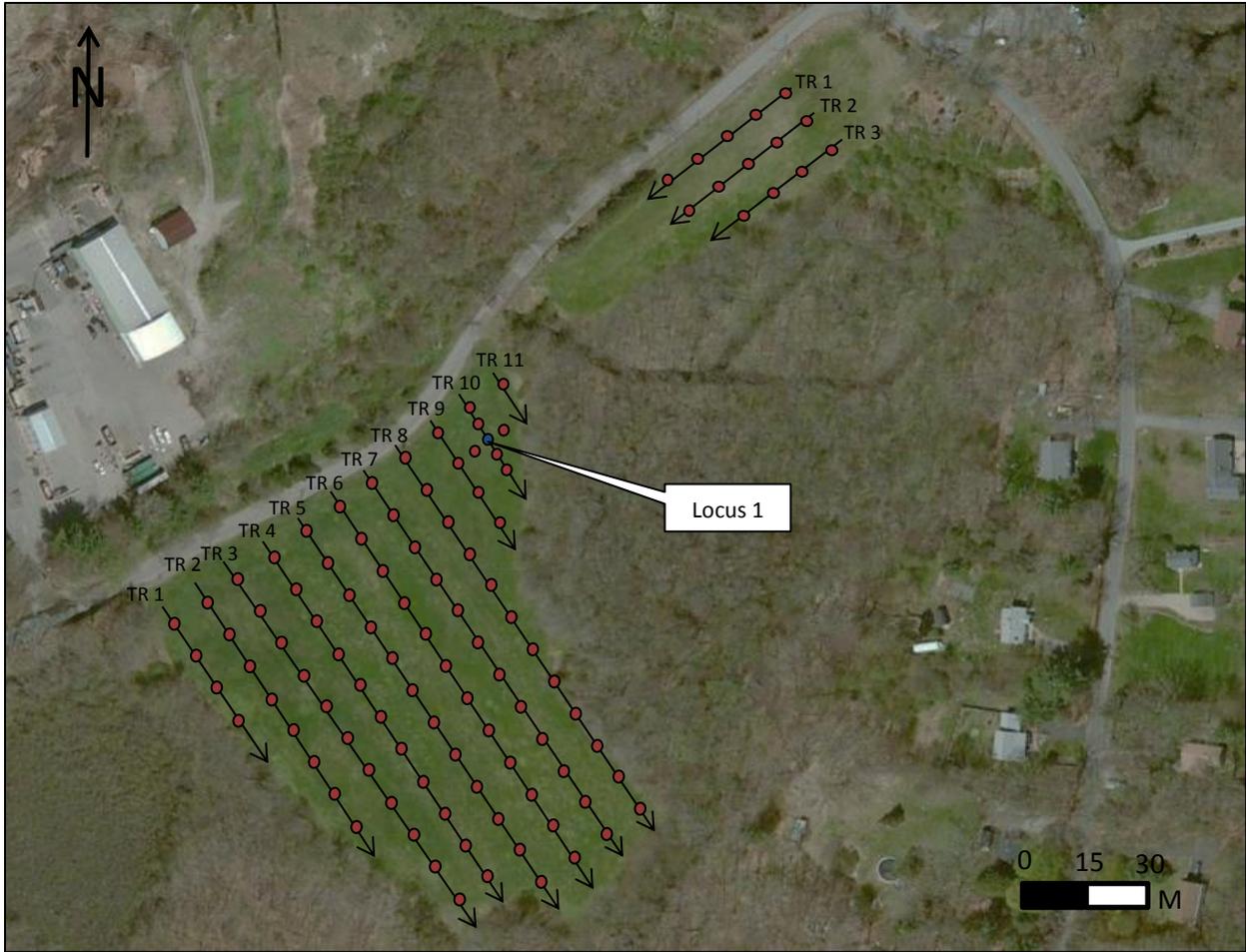


Figure 2. Plan view of the proposed Mounting plane 1 and 4 areas and shovel test locations.



Photo 1. Mounting plane 1 area facing south (note this area consists of a fallow agricultural field).



Photo 2. Mounting plane 2 and 3 area facing northeast (note these areas consists of landfills).



Photo 3. Mounting plane 4 area facing northwest (note this area consists of a fallow agricultural field).