SECTION 8 HISTORIC SITES

In July and August 2021, Tetra Tech conducted a sensitivity assessment of the Project Area to evaluate potential impacts to historic resources. This included an Archaeological Resources Assessment by Tetra Tech in July and a Historic Architectural Property Assessment by The Public Archaeology Laboratory, Inc (PAL) in August. The sensitivity assessment included desktop research and a pedestrian survey of the Project Area. The results were summarized in a Request for Project Review (RPR) submitted to the Maine Historic Preservation Commission (MHPC; Exhibit 8-1).

Consultation with the MHPC was initiated with the RPR submission on November 29, 2021. The MHPC's response, received on December 13, 2021, stated that no prehistoric archaeological sites were within the proposed Project Area. However, they advised consulting mid-19th century maps to reassess the Project, specifically focusing on the 1860 J. Chace Jr. Map of Somerset County, Maine. This suggestion was made during a discussion between MHPC historic archaeologist Dr. Leith Smith and Tetra Tech archaeologist Sarah Haugh on December 9, 2021. The MHPC also requested a preliminary site plan and viewshed analysis of historic properties for the Area of Potential Effect within 3 miles of the project and any elevated viewpoints within 5 miles of the Project (MHPC; Exhibit 8-2).

A preliminary site plan and viewshed analysis submitted to MHPC on March 9, 2022, identified three properties within the Area of Potential Effect's 3-mile search buffer. These properties are categorized as not eligible for listing in the National Register of Historic Places. MHPC responded March 23, 2022, that no historic properties would be affected relative to the viewshed analysis (MHPC; Exhibit 8-3).

Tetra Tech conducted a reassessment of historic maps relevant to the Project Area as well as a follow up site visit to the area around Burrill Woods Road and the main north-south access road that intersects the Project Area. This visit included an interview with Mr. Mat Burrill, a descendent of the Burrill's after whom the road is named. The visit aimed to aid MHPC in assessing historic archaeological requirements. The findings, submitted to MHPC on June 20, 2022 (Tetra Tech; Exhibit 8-4) identified several features including:

- a cellar hole with one remnant wall and an associated depression and well on the north side of Burrill Woods Road east of the main north-south access road;
- a foundation stone and deflated stone wall on the north side of Burrill Woods Road west of the main north-south access road; and,
- a former barn area approximately 650 feet east of intersection of Burrill Woods Road and the main northsouth access road.

See the June 20, 2022, MHPC submittal for photographs and locations of these features (Tetra Tech; Exhibit 8-4).

The June 20, 2022, letter stated the Applicant's commitment to avoiding these features on the north side of Burrill Woods Road east of the main north-south access road and creating a 50-foot avoidance buffer around them. MHPC correspondence dated July 6, 2022 (MHPC; Exhibit 8-5), provided a 'no adverse effect' determination for historic archaeology, conditional on the development limitations proposed by the Applicant which include:

1. a 50-foot avoidance buffer for the cellar hole and associated features (homestead and depression), on the north side of Burrill Woods Road east of the main north-south access road;

2. avoiding direct impacts to the foundation stone on the north side of Burrill Woods Road west of the main north-south access road; and,

3. avoiding direct impacts to the barn area approximately 650 feet east of intersection of Burrill Woods Road and the main north-south access road.

See Figures 7 and 8 of the June 20, 2022, MHPC submittal for locations of these features (Tetra Tech; Exhibit 8-4).

A. Summary of Findings of Effects

No historic properties will be physically impacted by the construction of the Project. A 50-foot avoidance buffer will be placed around the identified cellar hole and associated features. No effects that could impact a historic property's visual or auditory setting were identified.

In September 2022, consultation was initiated with federally recognized tribes in Maine: the Aroostook Band of Micmacs, the Houlton Band of Maliseet Indians, the Passamaquoddy Tribe, and the Penobscot Nation (Exhibit 8-6). A response was received from the Mi'kmaq Nation (Formerly known as the Aroostook Band of Micmac) on September 29, 2022, and from the Passamaquoddy Tribe on September 20, 2022 (Exhibit 8-6). Both responses stated the respective tribe has no immediate concern with the Project. They also requested that, should human remains, cultural resources, or archaeological material be encountered during construction, work will stop and the appropriate authorities, including the Mi'kmaq Nation and the Passamaquoddy Tribe be notified (Exhibit 8-6).

Exhibits

- Exhibit 8-1 MHPC RPR
- Exhibit 8-2 MHPC Response
- Exhibit 8-3 MHPC Architectural/Viewshed
- Exhibit 8-4 Tetra Tech Reassessment
- Exhibit 8-5 MHPC Historic Archaeology
- Exhibit 8-6 Tribal Consultation Letters and Responses

EXHIBIT 8-1 MHPC RPR



November 29, 2021

via Email

Kirk F. Mohney Director and State Historic Preservation Officer Maine Historic Preservation Commission 55 Capitol Street 65 State House Station Augusta, Maine 04333-0065

Re: Request for Project Review – Hartland Solar Project, Hartland, Somerset County, Maine

Dear Mr. Mohney,

Strobus Solar, LLC's (Strobus) is proposing to construct the Hartland Solar Project (Project) located in the Town of Hartland, Somerset County, Maine (Attachment 1). The Project requires permits from the Maine Department of Environmental Protection (MDEP) and is subject to review under the Maine Site Location of Development Act (Site Law, 38 M.R.S.A. §§ 481-490) and Section 106 of the National Historic Preservation Act, as amended (36 CFR 800). Strobus hired Tetra Tech, Inc. (Tetra Tech) to provide cultural resources consulting services and initiate consultation with your office to determine the scope of any investigations that may be required to identify and evaluate historic properties.

The Project consists of the development of a photovoltaic generating facility (solar farm) that will connect to a Central Maine Power (CMP) transmission corridor to the north and east of the Project area. The approximately 1,388 -acre Project Area is situated on Burrill Hill, between Route 151/Hartland Road to the north, Black Steam to the west, forested terrain to the south, and forested terrain leading to the CMP transmission corridor. A site plan for the Project is under development and will be informed by ongoing environmental resources surveys, the proposed development will stay within the limits of the current Project Area.

To support this Request for Project Review (RPR) an Archaeological Resources Assessment and a Historic Architectural Property Assessment were undertaken. The Archaeological Assessment was performed by Tetra Tech in July 2021 and the Historic Architectural Property Assessment was performed by The Public Archaeology Laboratory, Inc. (PAL) in August 2021. Summary memos for both assessments are included with this submission as Attachments 2 and 3.

On behalf of Strobus, Tetra Tech requests Maine Historic Preservation Commission's (MHPC) comments on the Project and information about the scope of any cultural resources investigations that may be needed to assist the MHPC in its review. If you have any questions

Strobus Solar

about the Project, please contact me via email, <u>sarah.haugh@tetratech.com</u>, or phone, 978-660-6883 (cell), at any time.

Respectfully Submitted,

Sarsh M. Haugh

Sarah Haugh Archaeologist

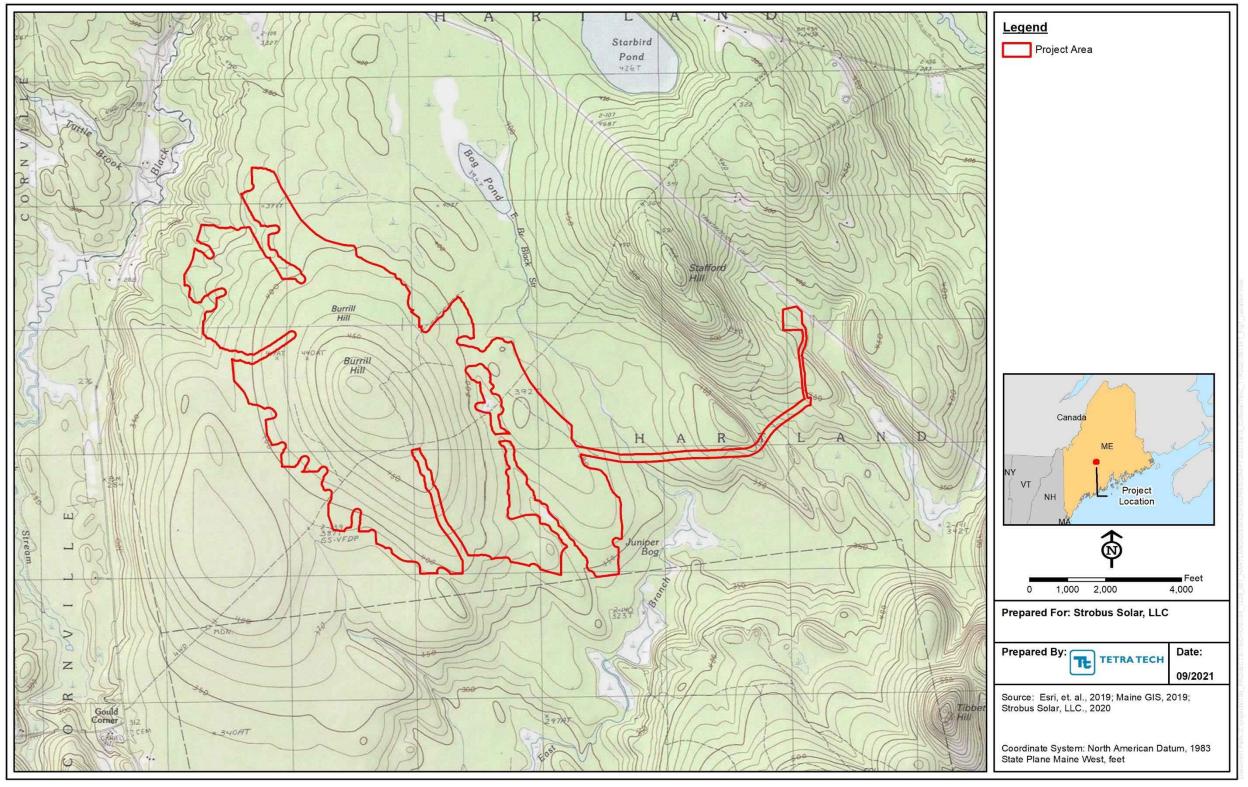
Cc: Dani Torcolacci – Strobus Brad Agius – Tetra Tech Steve Olausen – PAL

Attachments:

- 1. Figures
- 2. Archaeological Resources Assessment Summary Memo
- 3. Historic Architectural Property Assessment Summary Memo

Attachment 1

Figures



Not for Construction

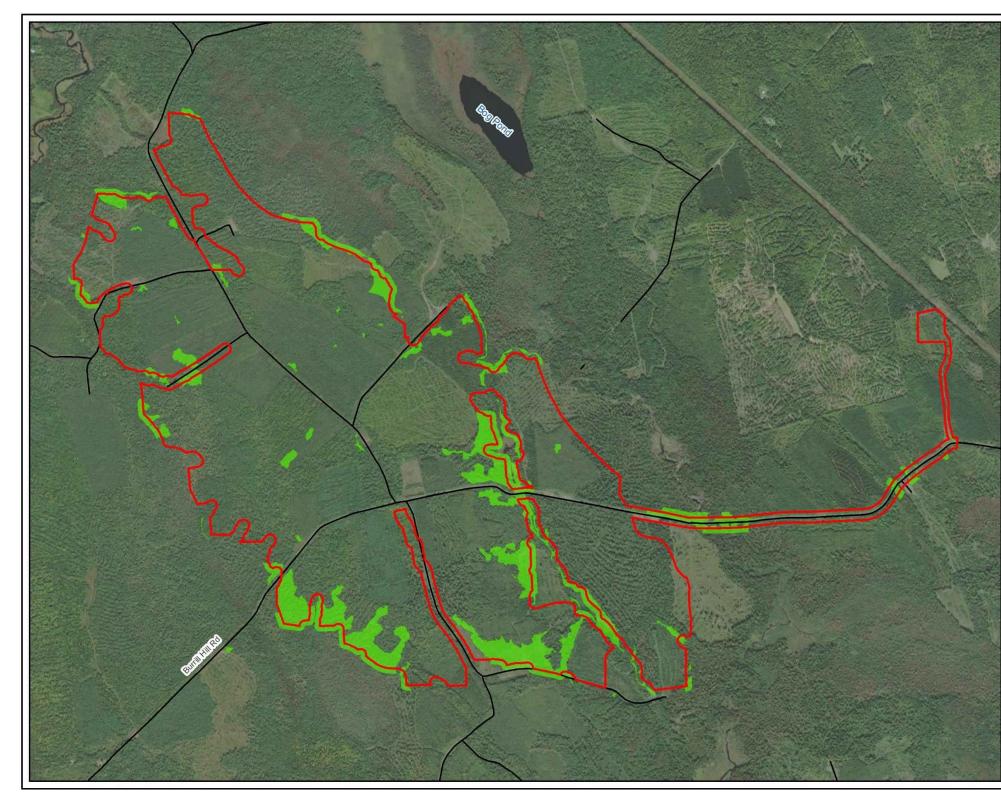


Figure 2 – Hartland Solar Project, Aerial View



Not for Construction

Attachment 2

Archaeological Resources Assessment Summary Memo



Memo

То:	Dani Torcolacci, Strobus Solar, LLC	
From:	Sarah Haugh, Tetra Tech	
Cc:	Brad Agius, Tetra Tech	
Date:	September 14, 2021	
Subject:	Archaeological Resources Assessment Hartland Solar Project, Hartland, Somerset County, Maine	

Strobus Solar, LLC's (Strobus) is proposing to construct the Hartland Solar Project (Project) located in the Town of Hartland, Somerset County, Maine (Attachment 1: Figures). The Project requires permits from the Maine Department of Environmental Protection (MDEP) and is subject to review under the Maine Site Location of Development Act (Site Law, 38 M.R.S.A. §§ 481-490) and Section 106 of the National Historic Preservation Act, as amended (36 CFR 800). The approximately 1,388 -acre Project Area is situated on Burrill Hill, between Route 151/Hartland Road to the north, Black Steam to the west, forested terrain to the south, and forested terrain leading to a Central Maine Power transmission corridor.

Tetra Tech, Inc. (Tetra Tech) is assisting Strobus with Project permitting, including any required cultural resources studies. This Archaeological Resources Assessment was undertaken to assess the Project Area's potential to contain archaeological resources and aid the Maine Historic Preservation Commission's assessment of required cultural resources investigations for the Project.

Site Files Search

A site files search was undertaken through the Maine Historic Preservation Commission (MHPC) in December 2020 to support a Critical Issues Analysis (CIA) for the Project. The Study Area used for the files search consisted of approximately 8,832 acres located in the towns of Hartland and Canaan, Somerset County, Maine. The current 1,388-acre Project Area is entirely contained within the Study Area used for the CIA. The search determined that no previously recorded historic or prehistoric sites are located in the Study Area. Additionally, no prior surveys for cultural resources have been conducted in the Study Area (Spiess 2020).

Reconnaissance Survey

Tetra Tech archaeologist Sarah Haugh completed a walkover of the Project Area on July 22, 2021 to document and assess existing site conditions (Attachment 2: Photographs). The Project Area is rural and forested, consisting of a main plateau situated on Burrill Hill surrounded by varying upland and wetland terrain. Numerous logging roads intersect the Project Area and range from well-established gravel roads to small dirt roads typically no longer in use. The Project Area has been subject to historic and recent logging, with many logged areas presenting hummocky, saturated terrain often with areas of standing water. Site conditions are broadly categorized as wet and disturbed.

Tetra Tech, Inc.

451 Presumpscot Street Portland, Maine 04103 Tel 978-660-6883 | tetratech.com The East Branch of Black Stream and Black Stream represent the closest navigable waterways, lying 0.2 miles east and 0.35 miles west of the Project Area, respectively. Both streams flow south and ultimately confluence at the Carrabassett Stream.

Soils within the Project Area are dominated by Dixmont and Bangor Series' very stony silt loams, typically on slopes ranging from 0 to 8 percent and 3 to 8 percent. Surficial geology is comprised of till. Undisturbed auger tests typically exhibited thin to moderate A and B strata overlying intact C subsoil stratum.

The walkover located two deflated stone walls: one located in the central portion of the Project Area, east of Burrill Woods Road; and the second located in the southern portion of the Project Area west of and parallel to Burrill Woods Road. A review of United States Geological Service (USGS) topographic maps from 1913, 1955, and 1989 identified three structures in the vicinity of the current intersection of Burrill Woods Road and the main east-west access road that intersects the Project Area. The 1913 USGS map identifies two structures on the north side of Burrill Woods Road. The 1955 USGS map identifies one structure on the south side of the Burrill Woods Road. No evidence of these former structures was observed during the walkover survey. No other historic archaeological resources or indications of historic sites were identified. A few small level upland areas were observed, however, these areas are not near navigable waterways and contained poorly developed soils, overall they present low sensitivity for prehistoric archaeological resources.

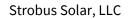
Recommendations

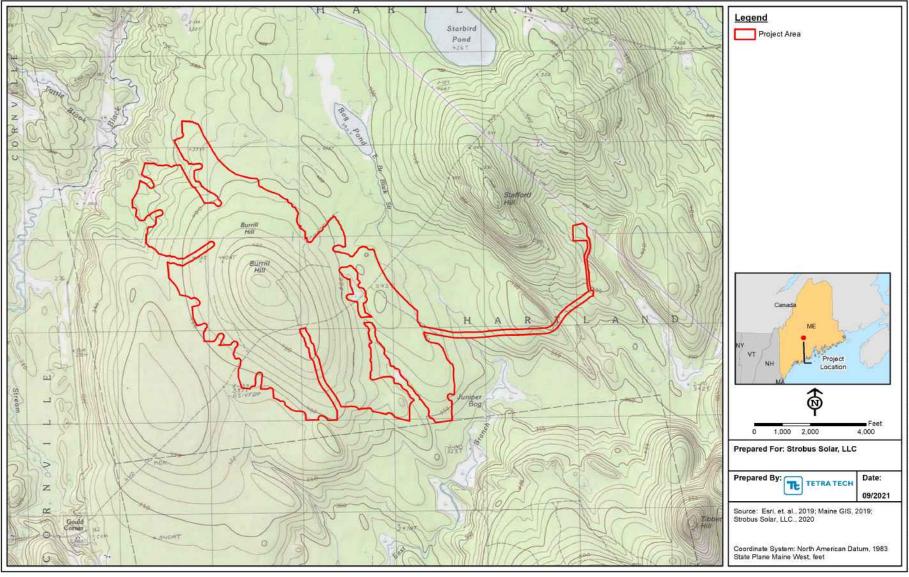
Based on the conditions observed during the reconnaissance survey the Project Area presents low sensitivity for both prehistoric and historic archaeological resources. No further archaeological investigations are recommended for the Project. Tetra Tech recommends initiating consultation with the MHPC through the submission of a request for project review (RPR) to determine the scope of any further cultural resources studies that may be required for the Project.

References

Spiess, A. 2020. Email communication from A. Spiess (Maine Historic Preservation Commission) to S. Haugh (Tetra Tech, Inc.). December 11, 2020.

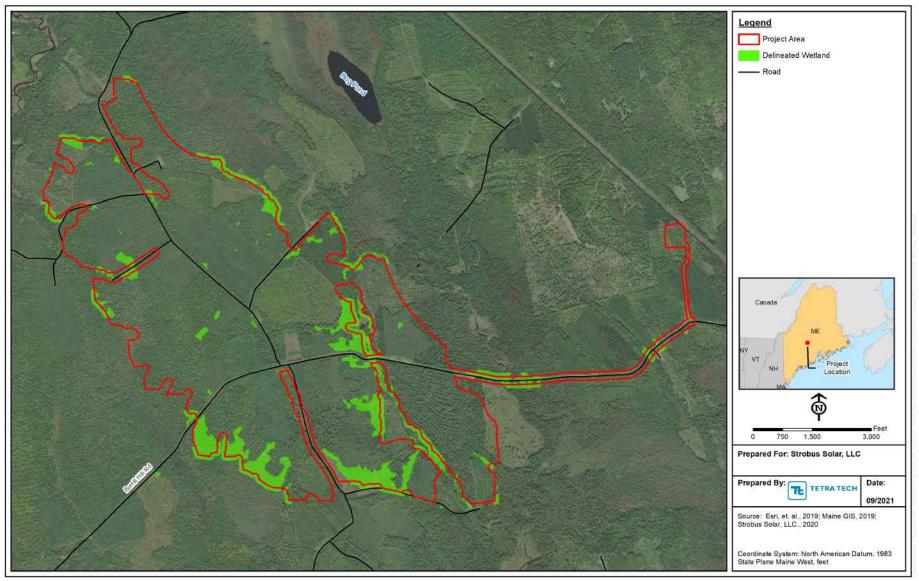
Attachment 1: Figures





Not for Construction

Figure 1. Hartland Solar Project, Hartland, Somerset County, Maine, Topographic View



Not for Construction

Figure 2. Hartland Solar Project, Hartland, Somerset County, Maine, Aerial View

Attachment 2: Photographs



Photo 1. East view of the northern portion of the Project Area. The area in the foreground has been logged in the past and has revegetated. Standing water lies in the road ditch situated between the photographer and the foreground. The area is representative of portions of the Project Area with evidence of prior logging and saturated to wet soils.



Photo 2. West view towards Black Brook, located over 2,000 feet in the distance, from the northwest boundary of the Project Area. The area has been recently logged with timber slash remaining.



Photo 3. East, representative view of forested terrain in the central portion of the Project Area.



Photo 4. Northwest, representative view of forested terrain in the central portion of the Project Area. Three small knolls are depicted in this area on the USGS topographic map, the knolls are indiscernible on the ground.



Photo 5. North view of a section of deflated stone wall in the central portion of the Project Area, east of Burrill Woods Road.

Attachment 3

Historic Architectural Property Assessment Summary Memo



Report Hartland Solar Project Hartland, Maine

Historic Architectural Property Assessment August 31, 2021 PAL No. 4158

Submitted to:

Tetra Tech 451 Presumpscot Street Portland, ME 04103

Strobus Solar, LLC (Strobus) is proposing to develop the Harland Solar Project in Hartland, Maine (the "Project," Figure 1). The Project requires a permit from the Maine Department of Environmental Protection (MDEP) under the Maine Site Location of Development Act (Site Law, 38 M.R.S.A. §§ 481-490). Tetra Tech is assisting Strobus in developing the permit application and contract with PAL to conduct a preliminary assessment of the Project's potential to impact historic architectural properties. The following presents the findings of the assessment and is intended to accompany information about the Project's potential to impact archaeological resources to be submitted by Tetra Tech to the Maine Historic Preservation Commission (MHPC) for review and comment.

Project Description

The Project site consists of approximately 1,388 acres comprising portions of parcels known as Tax Map 4, Parcels 3 and 8 and Tax Map, 5, Parcels 1, 4–3, and 4–8, located north and south of Burrill Woods Road in Hartland, Maine (Figure 2). Construction and operation of the Project is expected to require some grading of land and the installation of pilings/fence posts for the purposes of developing a grid-scale solar project.

Methodology

In accordance with the MHPC Project Review guidelines, PAL consulted the MHPC's Cultural & Architectural Resource Management Archive (CARMA) Map Viewer to identify previously recorded historic architectural properties in the vicinity of the Project and conducted an inspection of the Project site and adjacent parcels. The site visit was conducted on August 16, 2021 by a qualified architectural historian who drove all publicly accessible roads in and near the Project site to locate developed properties that appeared to be at least 50 years of age. The fieldwork included taking photographs and notes to document the setting and characteristics of the Project area and adjacent properties.

Assessment Results

There are no previously inventoried historic architectural properties within the Project site or its vicinity recorded in CARMA. The site visit revealed that the Project site consists of portions of five irregular-shaped parcels that are densely forested and transected by Burrill Woods Road, a maintained gravel road, through the south third of the site and informal private dirt roads and paths through the north two-thirds of the site (Photos 1–10). The land rises slightly from Steam Mill Road



and Munn Flat Road along Burrill Woods Road through the west and south portions of the Project site to the top of Burrill Hill (elevation approx. 400 feet) at the middle of the Project site and slopes down through the north and east portions of the Project site toward Athens/Hartland Road (State Route 151). The East Branch of Black Stream runs northwest–southeast under Burrill Woods Road in east half of the Project site and is excluded from the Project footprint. There are no buildings on the Project site. Adjacent properties consist of late 20th to early 21st century residences or undeveloped forested parcels. None of these residences are visible from the Project site and none have any potential historic significance.

Conclusions

The Project has no potential to impact historic architectural properties because no such properties exist within the Project site or surrounding areas that may have views of the Project after it is constructed.



Report Hartland Solar Historic Architectural Property Assessment page 3 of 9

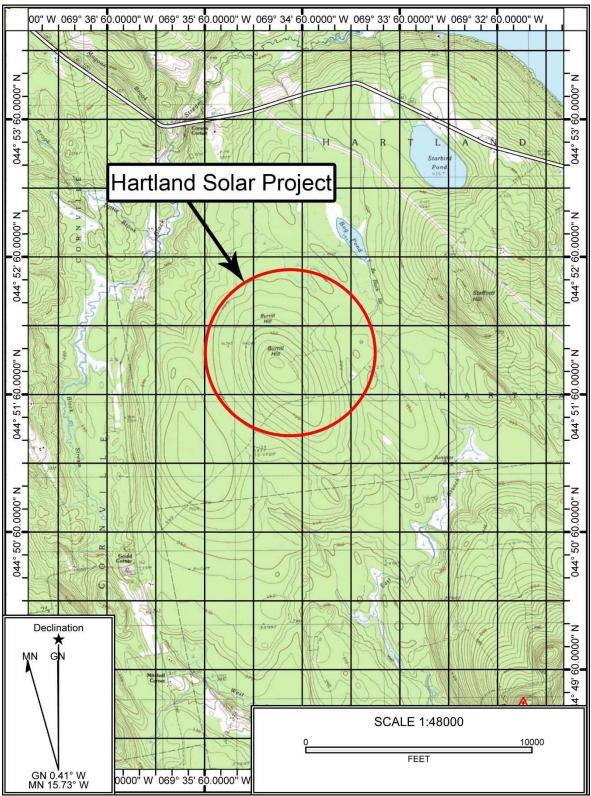


Figure 1. Location of the Hartland Solar Project.



Report Hartland Solar Historic Architectural Property Assessment page 4 of 9

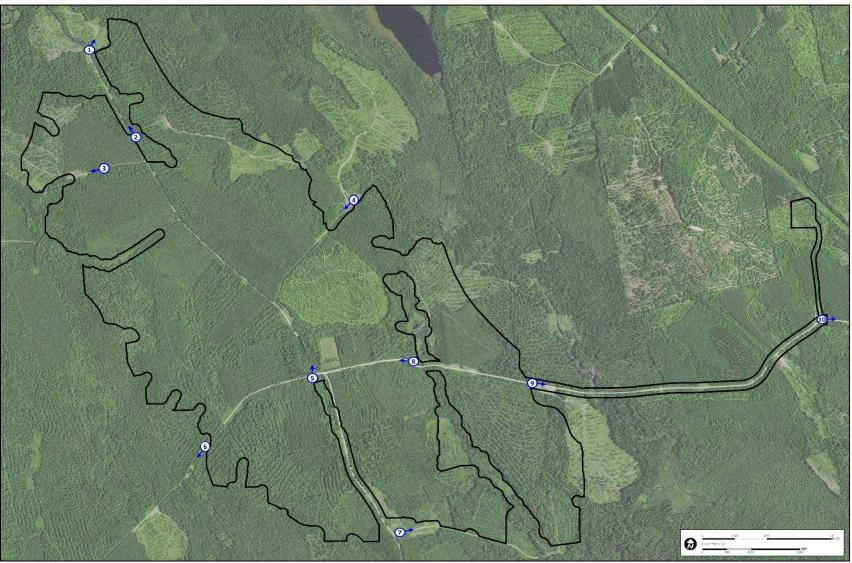


Figure 2. Hartland Solar Project limits and location of photographic views.



Report Hartland Solar Historic Architectural Property Assessment page 5 of 9



Photo 1. View from the northern boundary of the Project site, facing northeast from unnamed dirt access road.



Photo 2. View through northern end of the Project site, facing northwest along unnamed dirt access road.



Report Hartland Solar Historic Architectural Property Assessment page 6 of 9



Photo 3. View toward western boundary of the Project site, facing southwest along unnamed dirt access road.



Photo 4. View of eastern boundary of the Project site, facing southwest along unnamed dirt access road.



Report Hartland Solar Historic Architectural Property Assessment page 7 of 9



Photo 5. View of the middle of the Project site, facing north along unnamed dirt access road from Burrill Woods Road.



Photo 6. View from western boundary of the Project site, facing southwest along Burrill Woods Road.



Report Hartland Solar Historic Architectural Property Assessment page 8 of 9



Photo 7. View of southern boundary of the Project site, facing northeast from unnamed dirt access road.



Photo 8. View of the middle of the Project site, facing northwest along Burrill Woods Road.



Report Hartland Solar Historic Architectural Property Assessment page 9 of 9



Photo 9. View of east portion of the Project site, facing east along Burrill Woods Road.



Photo 10. View from the eastern boundary of the Project site, facing east along Burrill Woods Road.

EXHIBIT 8-2 MHPC RESPONSE

JANET T. MILLS

MAINE HISTORIC PRESERVATION COMMISSION 55 CAPITOL STREET 65 STATE HOUSE STATION AUGUSTA, MAINE 04333

> KIRK F. MOHNEY DIRECTOR

December 13, 2021

Ms. Sarah Haugh TetraTech 451 Presumpscot Street Portland, ME 04103

Project: MHPC #1932-21

Strobus Solar, LLC; Burrill Hill Solar Project

Town: Hartland, ME

Dear Ms. Haugh:

In response to your recent request, I have reviewed the information received November 29, 2021 to initiate consultation on the above referenced project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Please note that the information provided in CARMA is not complete. In order to confirm if an architectural survey should be conducted for the array site or sites, as well as the proposed transmission line, please submit a preliminary site plan and the viewshed analysis for the Area of Potential Effect (APE). The APE for above ground resources should be based on potential visual impacts for the area within 3 miles of the project and any elevated viewpoints within 5 miles of the project.

With regard to archaeological resources, there are no prehistoric archeological sites located with the proposed project area. For historic archaeological resources, based on information from our staff historic archeologist, Dr. Leith Smith, we will await your reassessment of the project area based on your consultation of the mid-19th century maps.

Please contact Megan M. Rideout of our staff at 287-2992 or megan.m.rideout@maine.gov if you have any questions regarding above ground resources.

Sincerely, Kilt. Mohnley

Kirk F. Mohney / State Historic Preservation Officer

EXHIBIT 8-3 MHPC ARCHITECTURAL VIEWSHED





March 9, 2022

via Email

Kirk F. Mohney Director and State Historic Preservation Officer Maine Historic Preservation Commission 55 Capitol Street 65 State House Station Augusta, Maine 04333-0065

Re: MHPC #1932-21, Preliminary Site Plan and Viewshed Analysis – Hartland Solar Project, Hartland, Somerset County, Maine

Dear Mr. Mohney,

Tetra Tech, Inc. (Tetra Tech) appreciates the Maine Historic Preservation Commission's (MHPC) response to our November 29, 2021 Request for Project Review for the Hartland Solar Project (Project) proposed by Strobus Solar, LLC's (Strobus) and located in the Town of Hartland, Somerset County, Maine. MHPC's response provided on December 13, 2021 detailed the following requirements for continued consultation on the Project:

- Provide MHPC a preliminary site plan and viewshed analysis of the Area of Potential Effect (APE) to aid MHPC in determining if an architectural survey will be required for the Project; and,
- Provide MHPC a reassessment of the Project area based on a review of mid-19th century maps to aid MHPC in determining if a historic archaeology survey will be required for the Project (specifically a review of the 1860 J. Chace Jr. Map of Somerset County, Maine, as discussed by MHPC historic archaeologist Dr. Leith Smith and Tetra Tech archaeologist Sarah Haugh on December 9, 2021)

Strobus and Tetra Tech are providing the requested preliminary site plan and associated viewshed analysis presented in Attachments 1 and 2 of this submittal. The requested reassessment of the Project area based on a review of mid-19th century maps will be provided as a separate submittal (i.e., Bullet #2).

The preliminary site plan dated June 18, 2021 is subject to change, however any future revisions will remain within the Project Area footprint in the November 29, 2021 Request for Project Review. The viewshed analysis was performed by Terrance J. Dwan & Associates (tjd&a) based on the preliminary site plan. Potential visibility was determined by creating a baseline digital surface model (DSM) from Light Detection and Ranging (LiDAR) data. LiDAR return points were

Tetra Tech, Inc. 451 Presumpscot Street, Portland, Maine 04103 Tel 207.358.2400 www.tetratech.com

Hartland Solar Project

Strobus Solar

added to the model to reflect the existing vegetation and built environment. The resulting viewshed analysis represents the potential visibility of the Project to a person standing at any location 5 feet above the ground surface. The viewshed model does not account for elevated views, for example at the tops of trees or the roofs of buildings.

Potential visibility of the Project was divided in to three different classes of data correlated to the height of the tallest Project components: the solar panels, 14 feet above ground surface; the transmission poles, 60 feet above ground surface; and the substation lightning structures, 60 feet above ground surface.

The viewshed analysis figures presented in Attachment 2 include the Project Area (red outline), the viewshed analysis with the three classes of data grouped to present any areas of potential visibility of the Project (yellow polygons), 3-mile (black dashed line) and 5-mile (purple dashed line) buffers, and the three historic aboveground properties identified through MHPC's CARMA Map Viewer as within the 3-mile Project area buffer (green points, note two properties are collocated and at the scale of the figure are represented as just one point).

The three previously identified historic properties located within the 3-mile search buffer of the Project area are listed as not be eligible for listing in the National Register of Historic Places (NRHP) (Table 1). The NRHP database was reviewed for NRHP-listed cultural resources within a 3-mile search buffer of the Study Area, no resources were identified.

Table 1. Previously Recorded Historic Aboveground Properties within 3-Miles of the Study Area.

MHPC Property Number	Property Type	Address	NAMP Status
6721	Single Family Residence	582 Hartland Road, Route 43	Not Eligible
6722	Barn		Not Eligible
97077	Bridge	Carries Hartland Road/Route 23 over Black Stream	Not Eligible

We appreciate MHPC's continued consultation on the Project. If we can provide additional information or if you have any questions about the Project, please contact me via email, sarah.haugh@tetratech.com, or phone, 978-660-6883 (cell), at any time.

Respectfully Submitted,

Jard M. Haugh

Sarah Haugh Archaeologist **Based on the information submitted, I have** concluded that there will be no historic properties affected by the proposed undertaking, as defined by Section 106 of the National Historic Preservation Act. Consequently, pursuant to 36 CFR 800.4(d)(1), no further Section 106 consultation is required unless additional resources are discovered during project 'mplementation pursuant to 36 CFR 800.13.

Kirk F. Mohney.

3/23/22 Date

State Historic Preservation Officer Maine Aistoric Preservation Commission

2

EXHIBIT 8-4 TETRA TECH REASSESSMENT



June 20, 2022

via Email

Kirk F. Mohney Director and State Historic Preservation Officer Maine Historic Preservation Commission 55 Capitol Street 65 State House Station Augusta, Maine 04333-0065

Re: MHPC #1932-21, Historic Map Review – Hartland Solar Project, Hartland, Somerset County, Maine

Dear Mr. Mohney,

Tetra Tech, Inc. (Tetra Tech) appreciates the Maine Historic Preservation Commission's (MHPC) response to our November 29, 2021 Request for Project Review for the Hartland Solar Project (Project) proposed by Strobus Solar, LLC's (Strobus) and located in the Town of Hartland, Somerset County, Maine (Attachment 1, Figure 1). MHPC's response provided on December 13, 2021 detailed the following requirements for continued consultation on the Project:

- Provide MHPC a preliminary site plan and viewshed analysis of the Area of Potential Effect (APE) to aid MHPC in determining if an architectural survey will be required for the Project; and,
- Provide MHPC a reassessment of the Project area based on a review of mid-19th century maps to aid MHPC in determining if a historic archaeology survey will be required for the Project (specifically a review of the 1860 J. Chace Jr. Map of Somerset County, Maine, as discussed by MHPC historic archaeologist Dr. Leith Smith and Tetra Tech archaeologist Sarah Haugh on December 9, 2021)

A reassessment of historic maps relevant to the Project area as well as findings from a follow up site visit are provided below to aid MHPC in assessing historic archaeological requirements for the Project. The preliminary site plan and associated viewshed analysis were provided in a March 9, 2022 submittal to the MHPC. The MHPC's March 23, 2022 response detailed no historic properties would be affected relative to the viewshed analysis.

Historic maps of the Project area reviewed, and a summary of historic structures located within the Project area are presented in Table 1. Attachment 1 includes figures depicting the Project Area overlain on the series of historic maps and figures depicting cultural features identified during the May 2022 reconnaissance of the area around Burrill Woods Road and the main north-south access road that intersects the Project Area (Attachment 1, Figures 2-8). Attachment 2 presents photographs from the May 2022 reconnaissance.

A total of five maps were reviewed including the 1860 and 1883 maps of Somerset County, Maine and a series of United States Geological Survey (USGS) topographic maps from 1913, 1955, and 1983. The 19^{th} century maps were not georeferenced due to a lack of comparable reference points, a general approximation of the Project Area was estimated (Attachment 1, Figures 2 and 3). The USGS maps were georeferenced allowing for an accurate view of historic structures within the Project area boundary (Attachment 1, Figures 4 – 6).

The review identified two structures on the 1860, 1883, and 1913 maps which appear in the same or similar locations on the north side of Burrill Woods Road near the current intersection of Burrill Woods Road and the main north-south access road that intersects the Project Area. A third structure is present on the 1883 and 1955 maps on the south side of Burrill Woods Road in the same general area. The location of the structure on the south side of the road on the 1883 map and 1955 appears to vary. This could be due to the inaccuracy of historic maps and both maps are depicting the same structure, or each map may depict a unique structure historically located in a similar area but at different discreet locations. The georeferenced 1955 map depicts this structure as outside but adjacent to the Project area.

Map Year	Title	Publisher	Historic Structures Within Project Area
1860	Map of Somerset County, Maine	J. Chace Jr.	Two structures on the north side of Burrill Woods Road.
1883	Map of Somerset County, Maine	Geo N. Colby & Co	Three structures, two on the north side and one on the south side of Burrill Woods Road near the current intersection of Burrill Woods Road and the main north-south access road that intersects the Project Area.
1913	Skowhegan, ME	USGS	Two structures on the north side of Burrill Woods Road near the current intersection of Burrill Woods Road and the main north- south access road that intersects the Project Area.
1955	Skowhegan, ME	USGS	None within the Project Area. One structure located adjacent to the Project area on the south side of Burrill Woods Road near the current intersection of Burrill Woods Road and the main north- south access road that intersects the Project Area.
1989	Canaan, ME	USGS	None within the Project Area.
	Harmony, ME	USGS	

 Table 1. Historic Maps Review Summary

Strobus Solar

As detailed in the Archaeological Resources Assessment Memo submitted to the MHPC with the November 29, 2021 Request for Project Review, Tetra Tech archaeologist Sarah Haugh completed a reconnaissance walkover of the Project Area on July 22, 2021 to document and assess existing site conditions. The Project Area has been subject to historic and recent logging, with many logged areas presenting hummocky, saturated terrain often with areas of standing water or timber slash. Site conditions are broadly categorized as wet and disturbed.

The walkover located two deflated stone walls: one located in the central portion of the Project Area, east of Burrill Woods Road; and the second located in the southern portion of the Project Area west of and parallel to Burrill Woods Road. No other historic archaeological resources or indications of historic sites were identified at the time.

During planning meetings in early 2022, Matt Burrill, descendent of the Burrill's after which the main road that intersects the Project Area is named and Trailmaster for the Smokey's Angels Snowmobile Club, relayed information on the former historic structures located adjacent to Burrill Woods Road and offered to point out areas during a follow up reconnaissance survey.

The May 6, 2022 follow up reconnaissance survey identified (Figures 7 and 8):

- a cellar hole with one intact wall and an associated depression and well on the north side of Burrill Woods Road east of the main north-south access road (Attachment 2, Photos 1-4);
- a foundation stone and deflated stone wall on the north side of Burrill Woods Road west of the main north-south access road (Attachment 2, Photos 5 and 6); and,
- a former barn area approximately 650 feet east of intersection of Burrill Woods Road and the main north-south access road (Attachment 2, Photos 7-8).

Mr. Burrill relayed circa 1980 as a child is the last time he remembers seeing aboveground structural remnants associated with the remaining cellar hole. The barn on the opposite side of the road to the east is not present on historic maps, Mr. Burrill informed that the barn was associated with the partially intact cellar hole structure. The barn used to have a stone foundation that was destroyed by historic and modern agricultural and forestry activities. These activities have likely destroyed most of the evidence of the other two structures depicted on historic maps on the north and south side of Burrill Woods Road. The reconnaissance did not identify these cellar holes, just a remnant foundation stone near the former structure location on the north side of the road. Mr. Burrill detailed he has never seen evidence of a structure on the south side of the road, and the cellar hole on the north side was destroyed by historic and modern agricultural and forestry activities leaving the remnant foundation stone.

Strobus is committed to avoiding the cellar hole and associated features (homestead and depression, see Figure 8), on the north side of Burrill Woods Road east of the main north-south access road and has created a 50-foot avoidance buffer around the features. Furthermore, Strobus is committed to avoiding direct impact to the foundation stone and barn area. Tetra Tech recommends continuing consultation with the MHPC to determine if the proposed 50-foot avoidance buffer will suffice for the identified cellar hole and features, see Figure 8), and the scope of any further cultural resources studies that may be required by MHPC for the Project.

We appreciate MHPC's continued consultation on the Project. Tetra Tech would be happy to provide a digital file of the Project Area if it would aid MHPC's review of historic archaeological resources. If

Strobus Solar

we can provide the digital file or if you have any questions about the Project, please contact me via email, sarah.haugh@tetratech.com, or phone, 978-660-6883 (cell), at any time.

Respectfully Submitted,

Sersh-M. Hough

Sarah Haugh Archaeologist

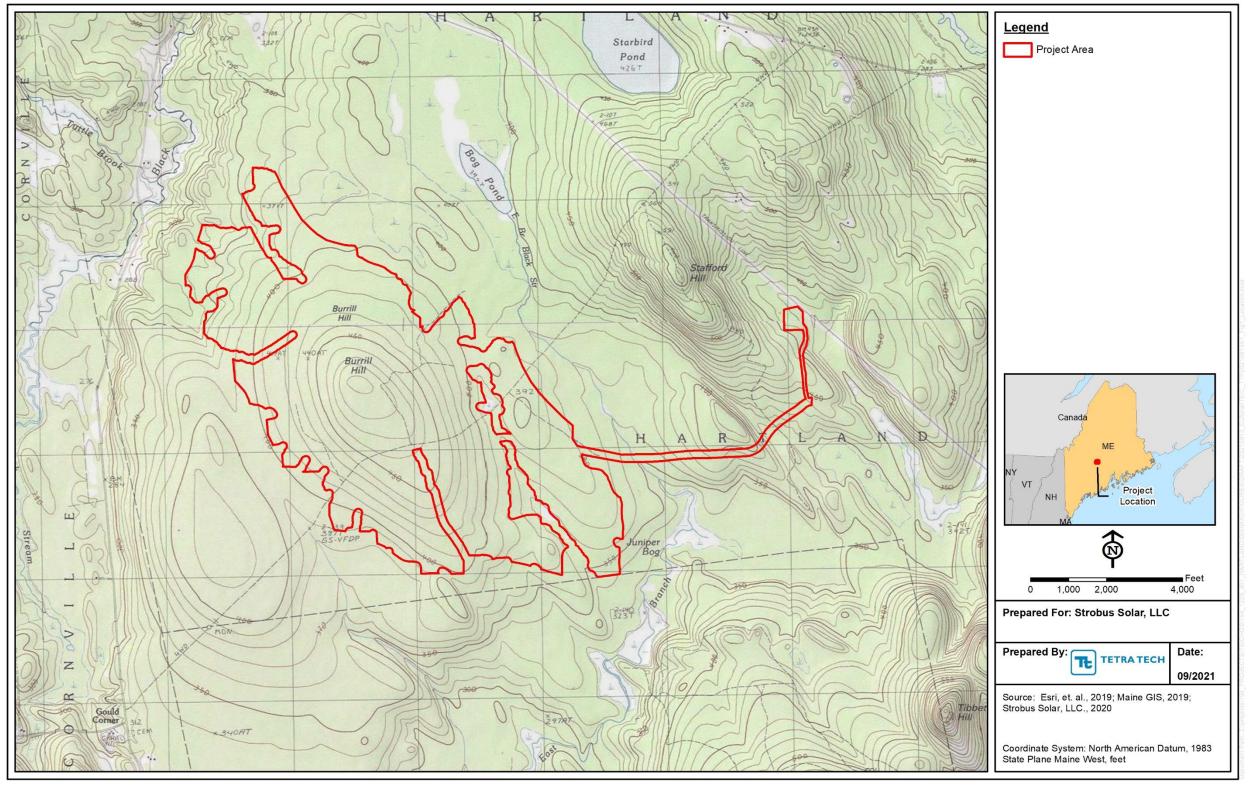
Cc: Dani Torcolacci – Strobus Solar Brad Agius – Tetra Tech

Attachments:

- 1. Figures
- 2. Photographs

Attachment 1

Figures



Not for Construction

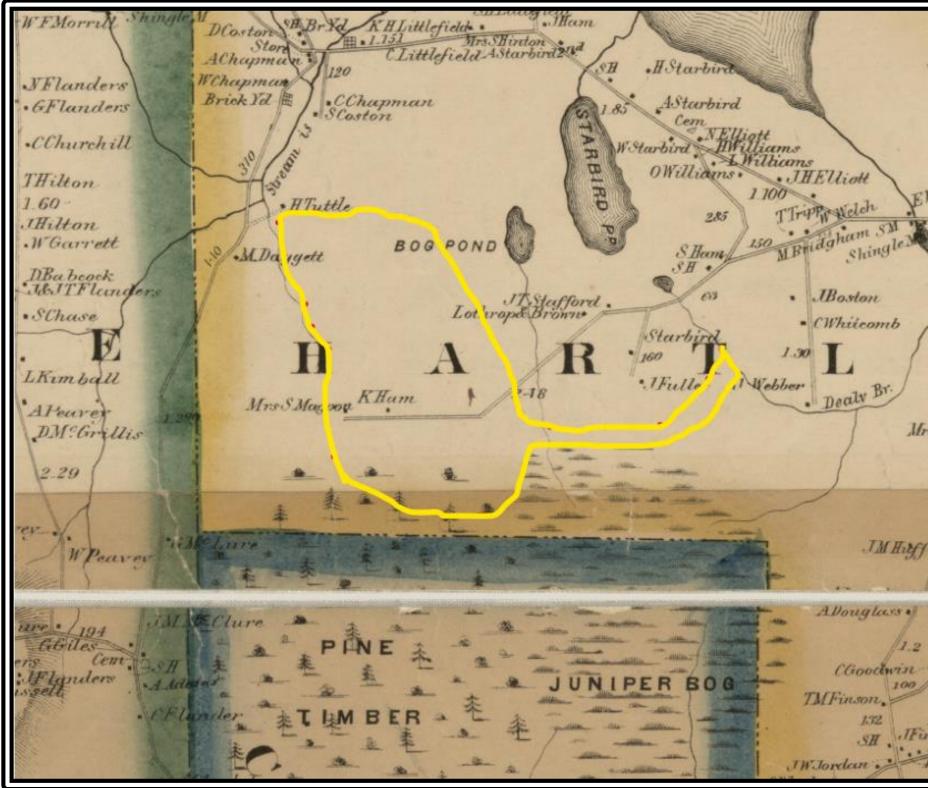


Figure 2 –1860 Map of Somerset County, Maine Hartland Solar Project

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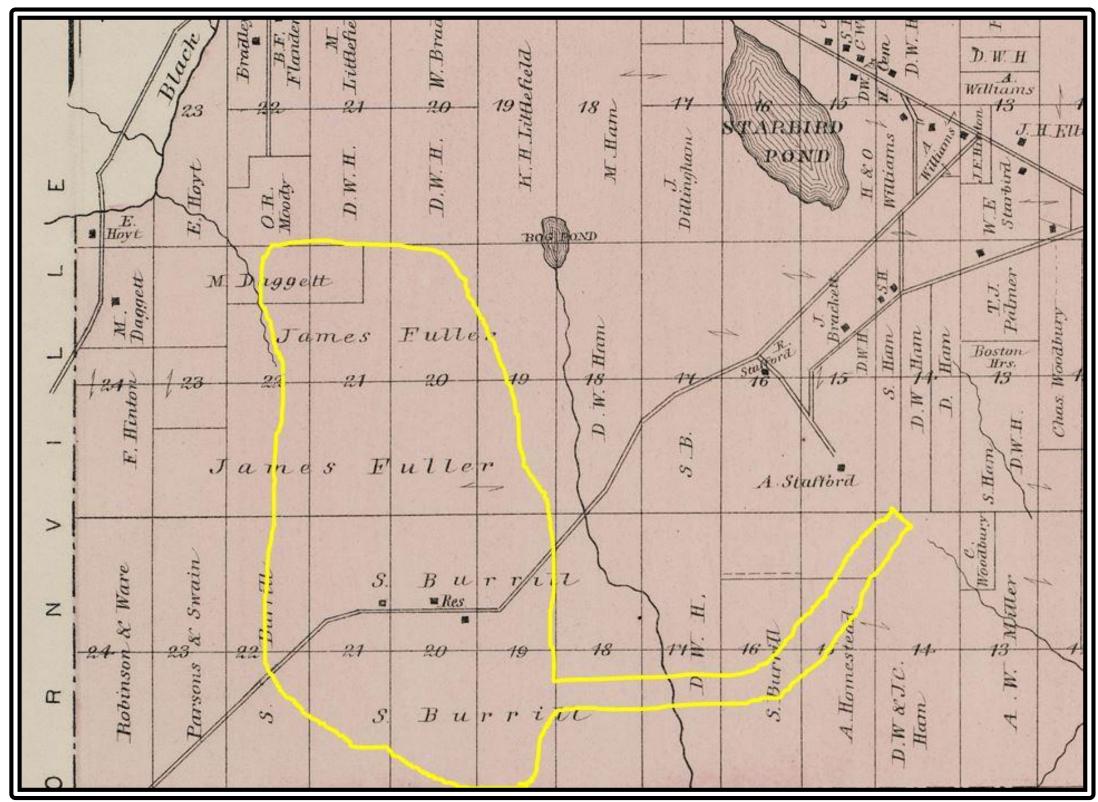


Figure 3 – 1883 Map of Somerset County, Maine Hartland Solar Project



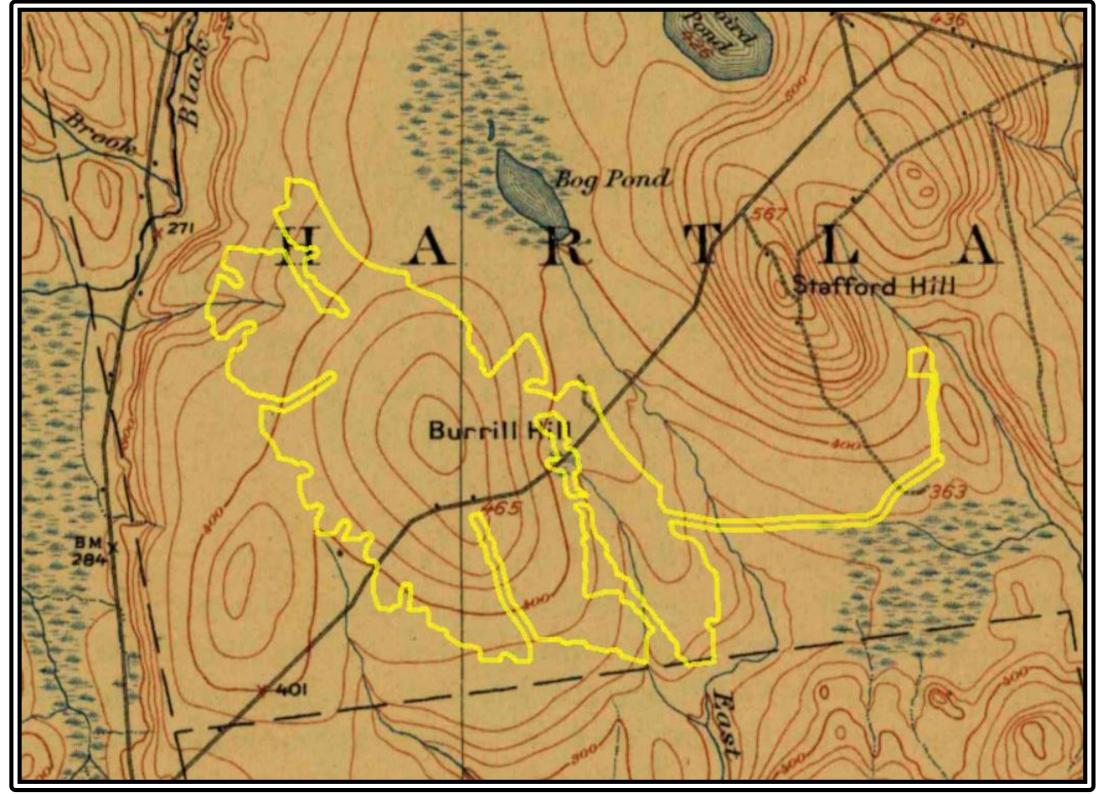


Figure 4 – 1913 USGS Topographic Map Skowhegan, Maine Hartland Solar Project

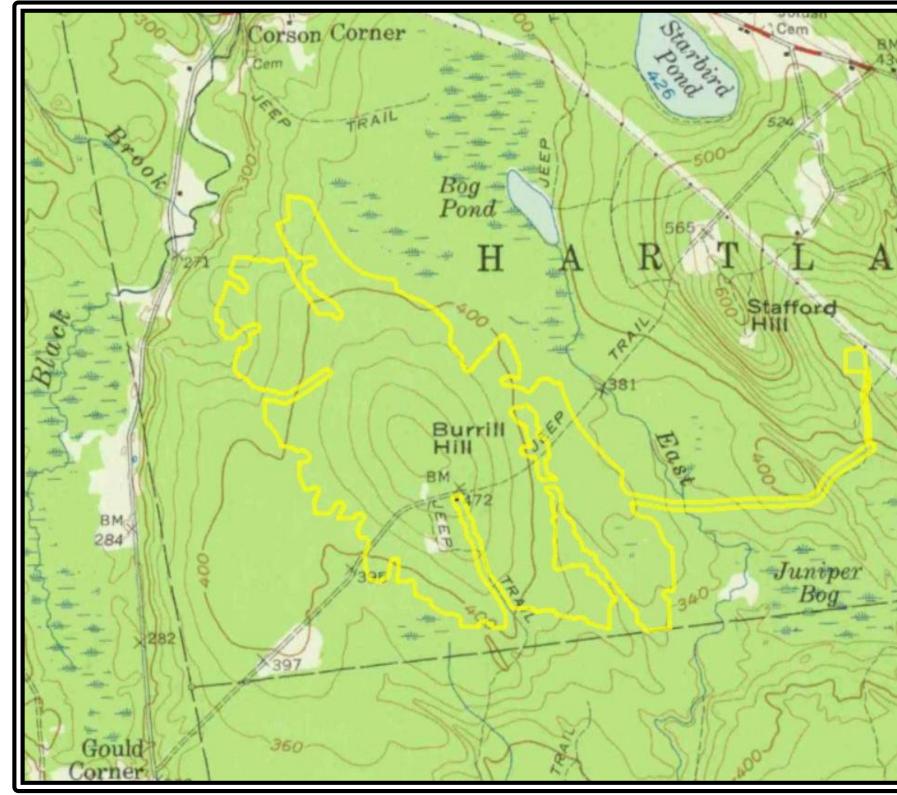


Figure 5 – 1955 USGS Topographic Map Skowhegan, Maine Hartland Solar Project

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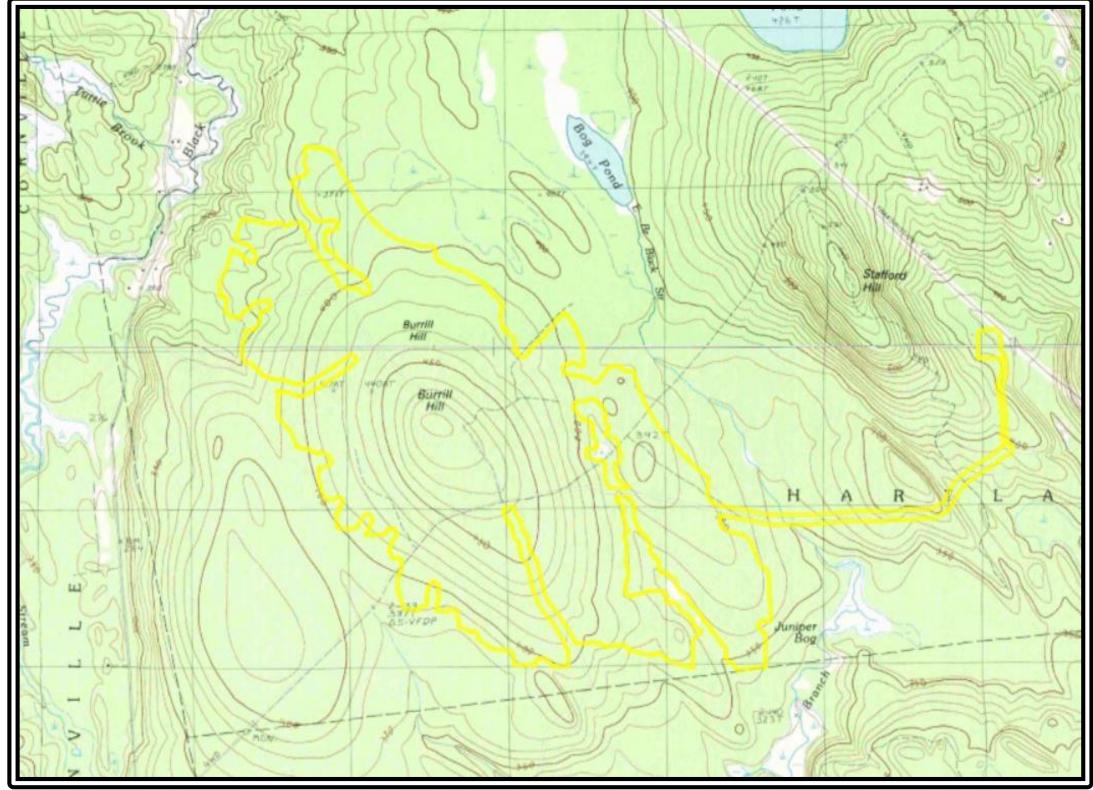


Figure 6 – 1989 USGS Topographic Maps Canaan and Harmony, Maine Hartland Solar Project

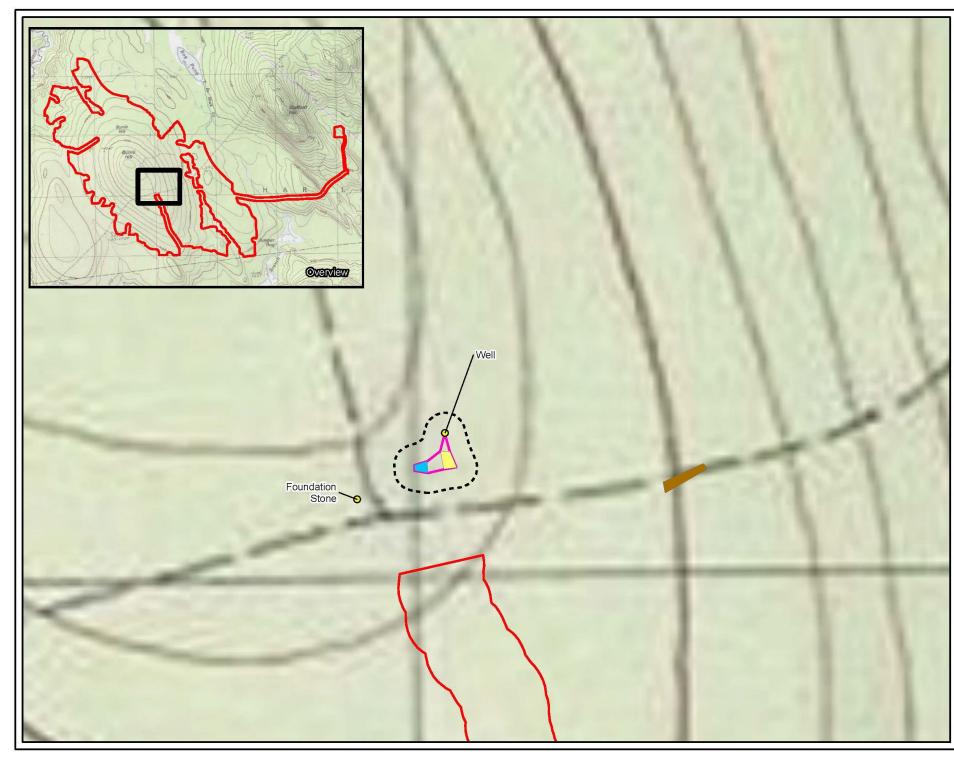


Figure 7 – Cultural Features, Topographic View



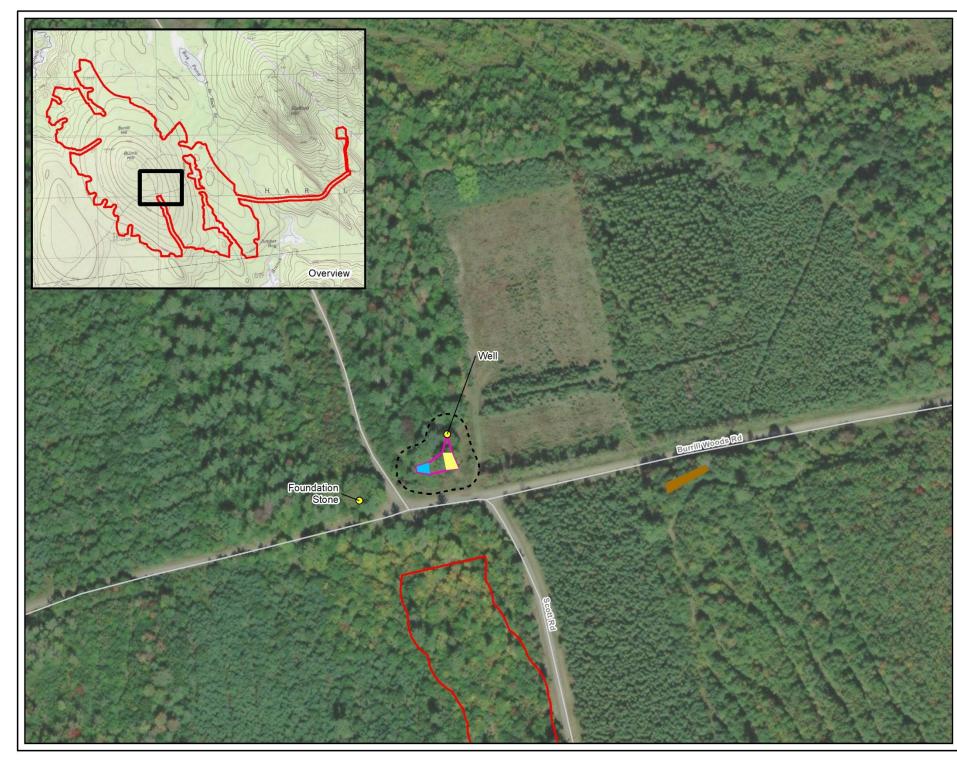
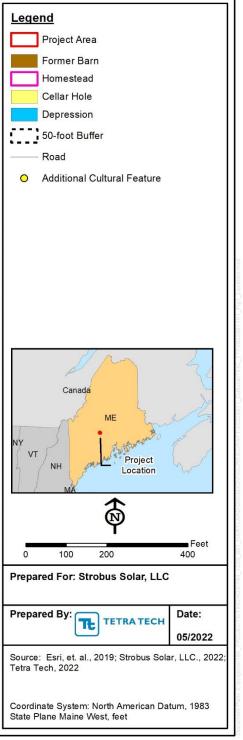


Figure 8 – Cultural Features, Topographic View

Hartland Solar Project



Attachment 2

Photographs

Strobus Solar



Photo 1. South view of the area containing the partially intact cellar hole located on the north side of Burrill Woods Road east of the main north-south access road.



Photo 2. Southwest view of the intact cellar hole wall.



Photo 3. Southwest view of the intact cellar hole wall.



Photo 4. View of the well associated with the partially intact cellar hole.



Photo 5. South view of the displaced foundation stone associated with the historic mapped structure on the north side of Burrill Woods Road west of the main north-south access road.



Photo 6. Southeast view of the deflated stone wall likely associated with the historic mapped structure on the north side of Burrill Woods Road west of the main north-south access road.



Photo 7. South view of the former barn area.



Photo 8. West view of the former barn area.

EXHIBIT 8-5 MHPC HISTORIC ARCHAEOLOGY



MAINE HISTORIC PRESERVATION COMMISSION 55 CAPITOL STREET 65 STATE HOUSE STATION AUGUSTA, MAINE 04333

JANET T. MILLS GOVERNOR KIRK F. MOHNEY DIRECTOR

July 6, 2022

Mr. Brad Aguis TetraTech 451 Presumpscot Street Portland, ME 04103

Project: MHPC #1932-21

Hartland, ME

Strobus Solar, LLC; Burrill Hill Solar Project

Dear Mr. Aguis:

Town:

In response to your recent request, I have reviewed the information received June 21, 2022 to continue consultation on the above referenced projects in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Based on the information submitted, I have concluded that the proposed work will have **no adverse effect** upon historic properties.

However, our finding is *conditional* upon the following:

1) A 50 foot buffer should be maintained around the two house sites and additional features should be avoided as recommended in the additional information provided to our office on June 21, 2022.

Please contact Megan M. Rideout at (207) 287-2992 or megan.m.rideout@maine.gov if we can be of further assistance in this matter.

Sincerely,

Kust. mohney

Kirk F. Mohney State Historic Preservation Officer

EXHIBIT 8-6 TRIBAL CONSULTATION LETTERS AND RESPONSES



September 15, 2022

Jennifer Pictou Tribal Historic Preservation Officer Aroostook Band of Micmacs 7 Northern Road Presque Isle, Maine 04769

Sent via hardcopy and email: jpictou@micmac-nsn.gov

Re: Hartland Solar Hartland, Maine

Dear Ms. Pictou:

Strobus Solar, LLC (the Applicant), a subsidiary of Teichos Energy, LLC, is proposing to construct the Hartland Solar Project (Project) located in Hartland, Maine, as presented in the attached figure. The Project is applying for a Site Law of Development permit through the Maine Department of Environmental Protection. The Applicant has engaged Tetra Tech Inc. (Tetra Tech) to lead the Maine Site Law permitting effort and to assist with cultural resources needs in support of the Project.

On behalf of the Applicant, Tetra Tech would like to initiate consultation with your office to determine if the Aroostook Band of Micmacs have any concerns regarding cultural resources and the development of the Project. We would appreciate your comments. If you have any questions about the Project, please contact me at any time.

Sincerely,

Frod P. Ayon

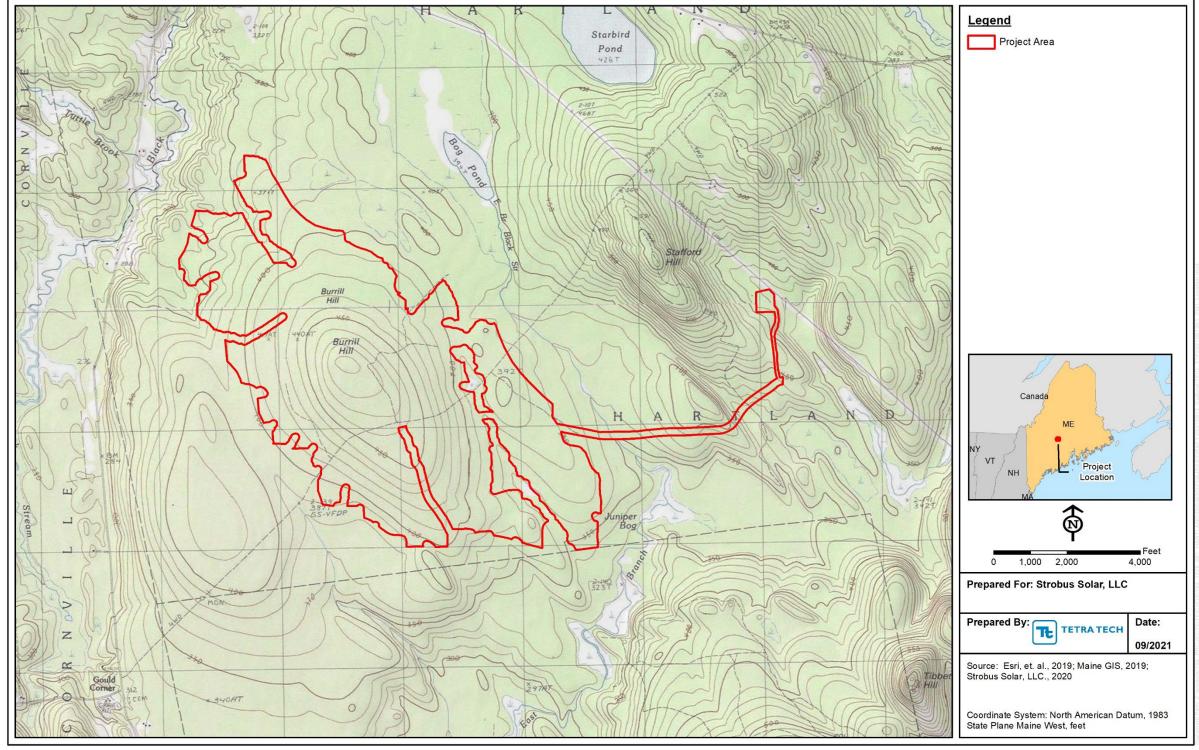
Brad Agius Project Manager

Enclosures: Figure

Cc: Dani Torcolacci (Teichos Energy, LLC)

Confidential Information. Do Not Distribute





Project Overview: Hartland Solar Project – Hartland, Maine



Tribal Historic Preservation Office Mi'kmaq Nation (Formerly known as the Aroostook Band of Micmac) Kendyl Reis Tribal Historic Preservation Officer 7 Northern Road Presque Isle, ME 04769 Phone: (207)764-1972 ext. 161 kreis@micmac-nsn.gov

Strobus Solar LLC, Hartland Solar Project

Hartland, Maine September 29th, 2022

Based on the project description, we do not have knowledge of any specific sites or cultural features that exist at the proposed project location(s).

However, this geographic area does constitute traditional areas that were historically utilized by members of the Mi'kmaq Nation and the other Wabanaki Tribes. Therefore, we respectfully request that if during the course of excavation/construction activities, human remains, artifacts, or any other evidence of Native American presence is discovered, that site activities in the vicinity of the discovery immediately cease, pending notification to us.

In addition, if this project results in wetland disturbances requiring mitigation, we are requesting that you utilize the black ash (Fraginus nigra) as the principal wetland species for wetland restoration activities. The black ash tree has special significance in the culture of the northeastern Tribes and is used extensively for weaving baskets and other Native American crafts. The black ash tree also provides valuable food and habitat for migratory waterfowl and other wildlife. Unfortunately, however, this species has been selected against by foresters and landowners who favor other tree species. As a result of this, and other environmental factors, the black ash tree is in serious decline in Maine. The Mi'kmaq Nation has completed several black ash wetland restoration projects and have a dependable source for highly-quality seedlings, and the experience and expertise to assist you with black ash wetland restoration projects.

On the subject of human remains, artifacts, or any other evidence of Native American presence is discovered. The human remains will be reburied with the appropriate respect for the remains that is required at a distinctive and respectable site. The artifacts and other evidence of Native American discovery will be documented with appropriate detail. The items will be analyzed for the precise period of the items' distinctive period and will be documented by the Tribal Historic Preservation Officer for the Mi'kmaq Nation.

If you have any questions or comments, please feel free to contact me.

Sincerely,

Kendyl Reis Tribal Historic Preservation Officer



September 15, 2022

Susan Young Tribal Historic Preservation Officer Houlton Band of Maliseet Indians 88 Bell Road Littleton, Maine 04730

Sent via hardcopy and email: ogs1@maliseets.com

Re: Hartland Solar Hartland, Maine

Dear Ms. Young:

Strobus Solar, LLC (the Applicant), a subsidiary of Teichos Energy, LLC, is proposing to construct the Hartland Solar Project (Project) located in Hartland, Maine, as presented in the attached figure. The Project is applying for a Site Law of Development permit through the Maine Department of Environmental Protection. The Applicant has engaged Tetra Tech Inc. (Tetra Tech) to lead the Maine Site Law permitting effort and to assist with cultural resources needs in support of the Project.

On behalf of the Applicant, Tetra Tech would like to initiate consultation with your office to determine if the Houlton Band of Maliseet Indians have any concerns regarding cultural resources and the development of the Project. We would appreciate your comments. If you have any questions about the Project, please contact me at any time.

Sincerely,

Frod P. Ayon

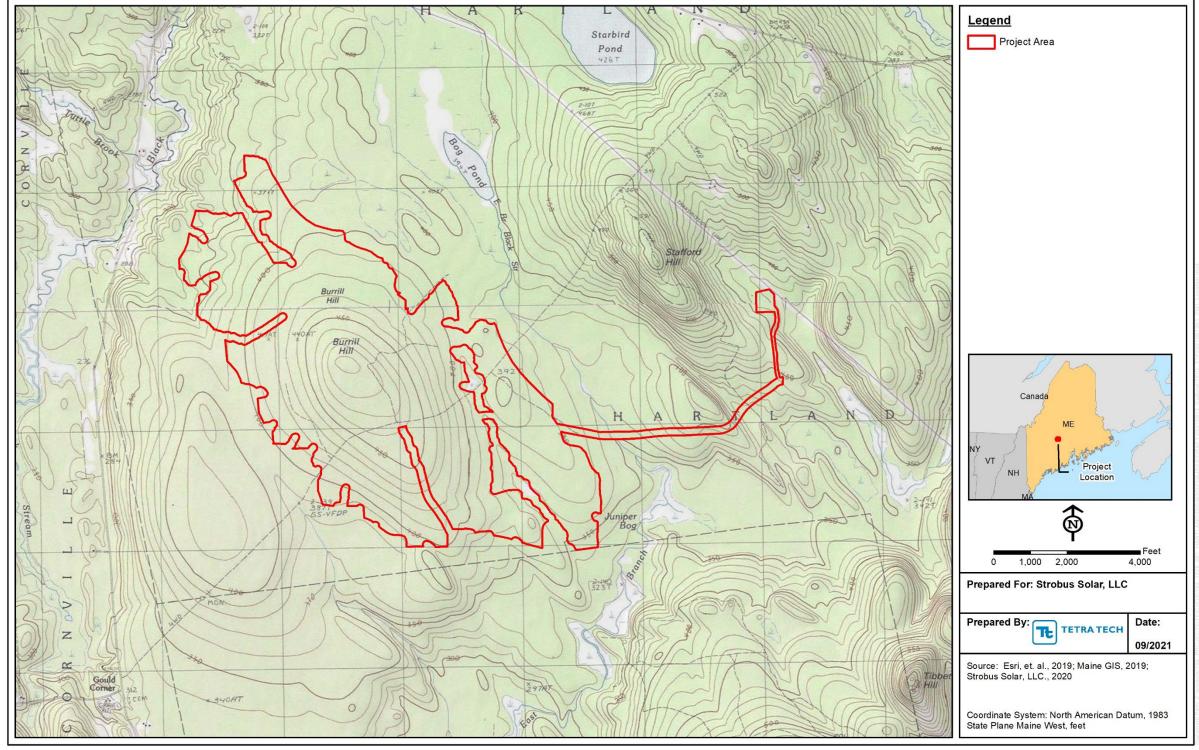
Brad Agius Project Manager

Enclosures: Figure

Cc: Dani Torcolacci (Teichos Energy, LLC)

Confidential Information. Do Not Distribute





Project Overview: Hartland Solar Project – Hartland, Maine



September 15, 2022

Christopher Sockalexis Tribal Historic Preservation Officer Penobscot Nation 12 Wabanaki Way Indian Island, Maine 04468

Sent via hardcopy and email: chris.sockalexis@penobscotnation.org

Re: Hartland Solar Hartland, Maine

Dear Mr. Sockalexis:

Strobus Solar, LLC (the Applicant), a subsidiary of Teichos Energy, LLC, is proposing to construct the Hartland Solar Project (Project) located in Hartland, Maine, as presented in the attached figure. The Project is applying for a Site Law of Development permit through the Maine Department of Environmental Protection. The Applicant has engaged Tetra Tech Inc. (Tetra Tech) to lead the Maine Site Law permitting effort and to assist with cultural resources needs in support of the Project.

On behalf of the Applicant, Tetra Tech would like to initiate consultation with your office to determine if the Penobscot Nation have any concerns regarding cultural resources and the development of the Project. We would appreciate your comments. If you have any questions about the Project, please contact me at any time.

Sincerely,

And P. Ayon

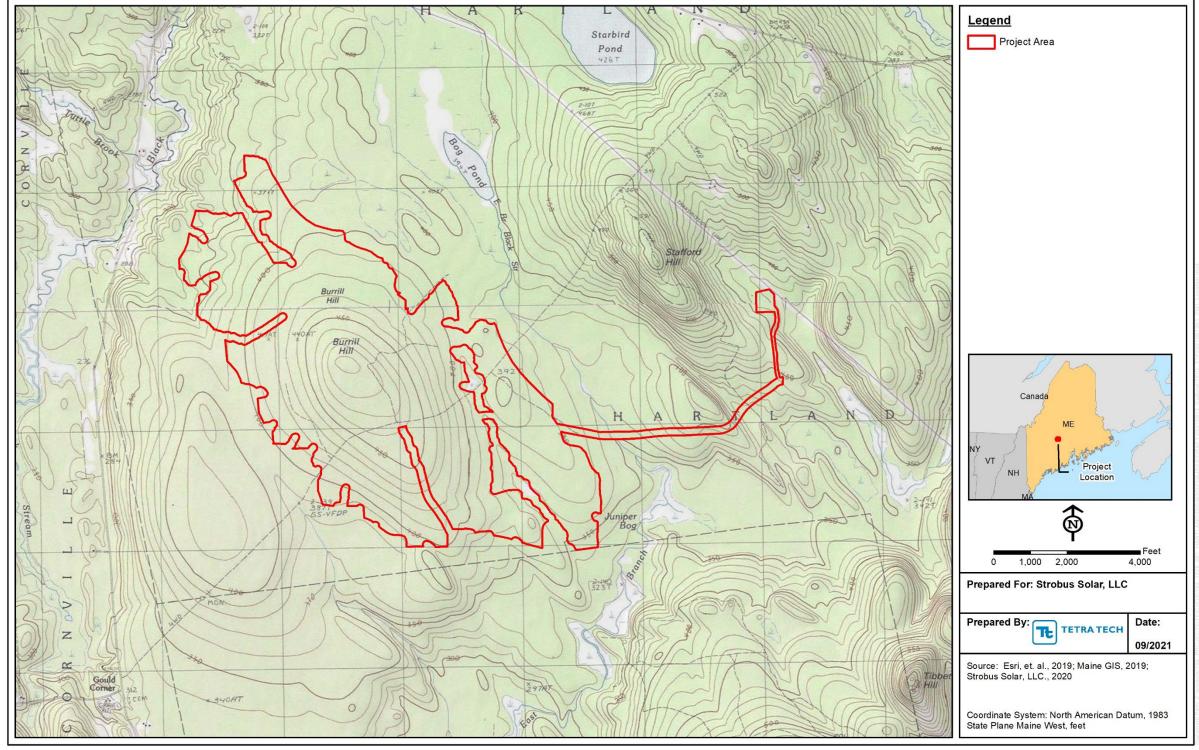
Brad Agius Project Manager

Enclosures: Figure

Cc: Dani Torcolacci (Teichos Energy, LLC)

Confidential Information. Do Not Distribute





Project Overview: Hartland Solar Project – Hartland, Maine



September 15, 2022

Donald Soctomah Tribal Historic Preservation Officer Passamaquoddy Tribe P.O. Box 159 Princeton, Maine 04668

Sent via hardcopy and email: soctomah@gmail.com

Re: Hartland Solar Hartland, Maine

Dear Mr. Soctomah:

Strobus Solar, LLC (the Applicant), a subsidiary of Teichos Energy, LLC, is proposing to construct the Hartland Solar Project (Project) located in Hartland, Maine, as presented in the attached figure. The Project is applying for a Site Law of Development permit through the Maine Department of Environmental Protection. The Applicant has engaged Tetra Tech Inc. (Tetra Tech) to lead the Maine Site Law permitting effort and to assist with cultural resources needs in support of the Project.

On behalf of the Applicant, Tetra Tech would like to initiate consultation with your office to determine if the Passamaquoddy Tribe have any concerns regarding cultural resources and the development of the Project. We would appreciate your comments. If you have any questions about the Project, please contact me at any time.

Sincerely,

Frod P. Ayon

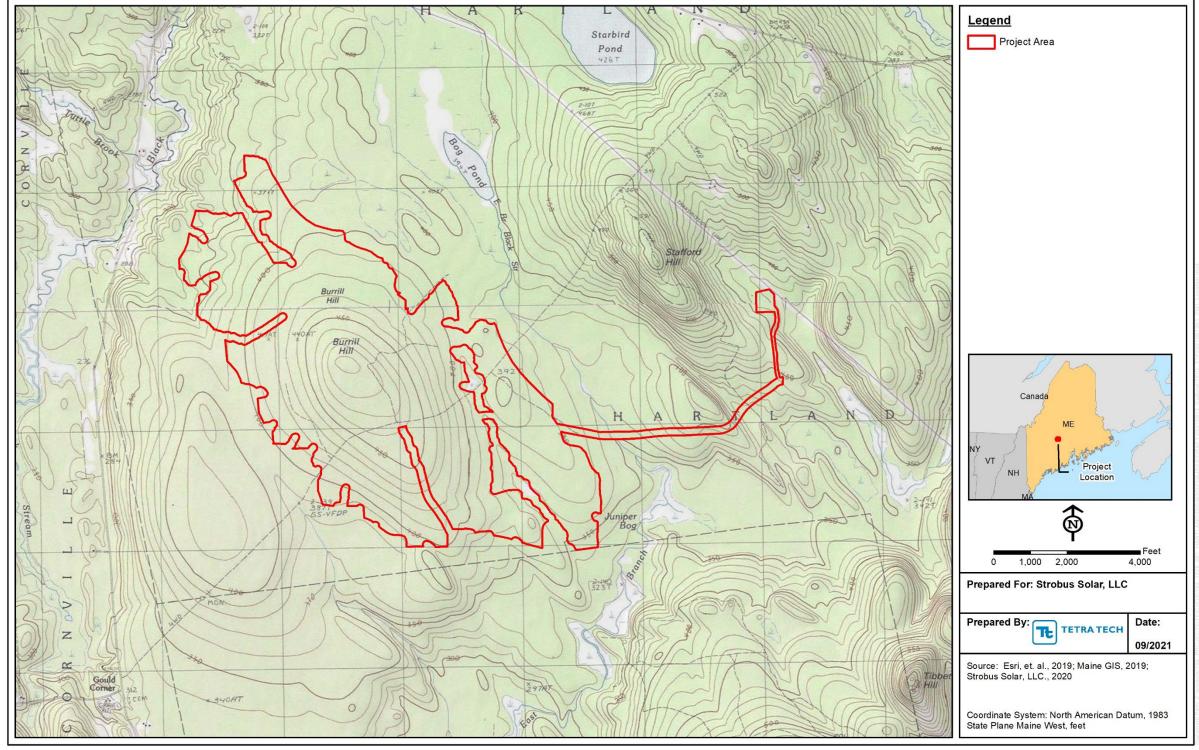
Brad Agius Project Manager

Enclosures: Figure

Cc: Dani Torcolacci (Teichos Energy, LLC)

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Project Overview: Hartland Solar Project – Hartland, Maine

Tribal Historic Preservation Office Passamaquoddy Tribe PO Box 159 Princeton, Me. 04668 207-214-4051

September 20, 2022

Brad Agius | Director – Renewable Energy & Natural Resources, Northeast Tetra Tech

• Hartland – Solar Project

Dear Brad;

The Passamaquoddy THPO has reviewed the following applications regarding the historic properties and significant religious and cultural properties in accordance with NHPA, NEPA, AIRFA, NAGPRA, ARPA, Executive Order 13007 Indian Sacred Sites, Executive Order 13175 Consultation and Coordination with Indian Tribal Governments, and Executive Order 12898 Environmental Justice.

The Projects listed above will not have any impact on cultural and historical concerns of the Passamaquoddy Tribe. Should buried artifacts, human remains, cultural sites or ground features be unexpectedly unearthed during ground disturbing activities, all construction should immediately cease and the resources be examined by a professional archaeologist. Additionally, all appropriate authorities-including all pertinent tribal entities should be notified.

Sincerely;

Donald Soctomah Soctomah@gmail.com THPO Passamaquoddy Tribe