

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth Massachusetts Historical Commission

October 19, 2021

Lee Morrison AMP Solar Development 1550 Wewatta Street, Floor 4 C/O Denver, CO 80202

RE: AMP Solar Development in Amherst, Shutesbury, and Pelham, MA:

ASD Shutesbury MA Solar LLC, 0 Shutesbury Road, Parcels 9B-11, 9B-12, and 9D-27, Amherst, MA.

MHC #RC.69691;

ASD Pratt Corner East Solar LLC, 0 Pratt Corner Road, Parcel ZW-6, Shutesbury, MHC #RC.69689;

ASD Pratt Corner East Solar LLC, 0 Pratt Corner Road, Parcel ZG-2, Shutesbury, MHC #RC.69688;

ASD Leverett West MA Solar LLC, Leverett Road, Parcel ZF-15, Shutesbury, MHC #RC.69745;

ASD Pratt Corner Road South MA Solar LLC, Pratt Corner Road, Parcel ZU-2, Shutesbury, MHC #RC.69644;

ASD Montague MA Solar LLC, South Annex, South of Carver Road, Parcel ZD-37 South, Shutesbury, MHC #RC.69747:

ASD Montague Road MA Solar LLC, Montague Road and North of Carver Road, Parcel ZD-37 North, Shutesbury, MHC # RC.69746: and

ASD Tower MA Solar LLC, off Tower Road, Parcel 41-1, Pelham, MHC #RC.69690.

Dear Mr. Morrison:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the State Archaeologist's permit application (950 CMR 70) to conduct an intensive (locational) archaeological survey, and an archaeological research design and methodology to conduct an archaeological reconnaissance survey, prepared and submitted by SWCA, for the ASD Shutesbury MA Solar LLC at 0 Shutesbury Road, Parcels 9B-11, 9B-12, and 9D-27 in Amherst.

The MHC has received scaled project plans for only the solar project proposed in Amherst (RC.69691). Scaled project plans, sized no larger than 11" by 17", should be submitted to the MHC for review and comment for the other proposed solar projects in Shutesbury and Pelham.

The State Archaeologist's permit application and research design submitted by SWCA for only the Amherst project is inconsistent with the MHC's June 11, 2021 comments regarding conducting one comprehensive identification effort for all the solar projects. To assist in the comprehensive historic and archaeological resource identification efforts for the proposed solar projects, the MHC looks forward to reviewing the State Archaeologist's permit application to conduct a comprehensive archaeological reconnaissance survey (950 CMR 70) for all solar projects referenced above in Amherst, Shutesbury, and Pelham.

The SWCA permit application does not include a copy of the current project plans. Current project plans should be provided to the archaeological consultant to assist in preparation of the comprehensive archaeological reconnaissance survey research design and methodology.

The purpose of the survey is to develop archaeologically sensitivity assessments for each of the project impact areas, and to provide recommendations for intensive (locational) archaeological survey, if any, within archaeologically sensitive project impact areas. The results of the survey will assist in consultation to consider alternatives to avoid, minimize, or mitigate any adverse effects to significant historic and archaeological resources.

The MHC looks forward to reviewing the information requested above, and to consultation to avoid, minimize or mitigate adverse effects to significant archaeological resources.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800) and M.G.L c. 9, ss. 26-27C (950 CMR 70-71). If you have any questions or require any information, please contact Jonathan K. Patton at this office.

Sincerely,

Brona Simon

State Historic Preservation Officer

Executive Director

State Archaeologist

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Massachusetts Historical Commission

xc: Deborah Szazo, Acting Regional Administrator, EPA Region 1, Attn: Thelma Murphy Mike Stover, EPA, Region 1
Amherst Historical Commission
Shutesbury Historical Commission
Pelham Historical Commission
Jeff Brandt, TRC Environmental Corporation
Christ Donta, SWCA