

August 9, 2017

Ms. Lisa Heavner, First Selectman
Town of Simsbury
933 Hopmeadow Street
Simsbury, Connecticut 06070

Re: Deepwater Wind LLC, Petition 1313 CT Siting Council

Dear Ms. Heavner:

The Simsbury Historic District Commission (HDC) welcomes the opportunity to evaluate the proposed Tobacco Valley Solar project. Because the proposed project location contains significant cultural resources that are potentially eligible for the National Register of Historic Places, we reviewed this project as if it were under HDC jurisdiction, considering its potential impact on the buildings, landscapes, archaeological resources, and overall character of the project area.

Simsbury has a rich historical heritage and an abundance of cultural resources, including four areas that are listed in the National Register. These include the Simsbury Center Historic District, the Tariffville Historic District, the Terry's Plain Historic District, and the East Weatogue Historic District. In addition, historic resource inventories (HRIs) have recommended the Ensign-Bickford Company, West Simsbury, and Wolcott Road/Town Poor Farm areas for listing as National-Register historic districts (Karmazinas 2010; Carley 2013). The 2013 HRI report further recommended consideration of a potential thematic, multiple-property nomination for Simsbury's historic farm buildings, or possibly a multiple-property nomination focused specifically on the town's tobacco agricultural buildings, which are particularly endangered. (For example, in 2009, fourteen Cullman Brothers' tobacco sheds on County, Firetown, and Hoskins roads were documented because they were slated for demolition; although twelve remain standing, their future remains uncertain.) The 2013 HRI also recommended that the town consider the possibility of nominating selected areas and landscapes to the National Register as Rural Historic Landscapes (Carley 2013, p. 29). We agree with these recommendations and strongly support preservation of agricultural buildings and rural landscapes, which are intrinsic to our town's character.

The HDC also reviewed the "Phase IA Cultural Resources Assessment Survey of the Proposed Simsbury Solar Farm in Simsbury, Connecticut," prepared by Heritage Consultants, LLC in February 2017. This report concludes that the properties at 85 Hoskins Road and 100 Hoskins Road and the five tobacco sheds in the project area are significant under National Register Criteria A and C. The survey identified two archaeological areas, Site 128-52 and Locus 1, as areas that should be subject to shovel-pit testing for evaluation of National Register eligibility. We concur with these findings as well.

The tobacco sheds are particularly important because of their association with minority workers. During and after World War II, Cullman Brothers, which owned four tobacco farms in Simsbury, hired field laborers from Southern schools. Morehouse College students had a dormitory in the vicinity of 8 Scarborough Street (close to Firetown Road), and as a Morehouse student in 1944 and 1947, Martin Luther King Jr. reportedly worked on Cullman Farm #1 in the Firetown Road/Barndoor Hills Road area (Carley 2013, p. 24). In his writings, Martin Luther King Jr. remembered his time working and living in non-segregated Simsbury as a pivotal time in his intellectual development, allowing him to imagine life in a racially-integrated society and planting the seeds for his leadership in the civil rights movement. While to date no evidence has been found that directly links Martin Luther King, Jr. to the Tobacco Valley Solar site, the agricultural landscape and buildings remain as important links to African-American workers and other minority groups. Agricultural laborers' seasonal migration to the Northeast, as a safe place to work, is a topic of significant historical interest. Minority groups are underrepresented in the historical record

and among extant historical architectural resources, and the Connecticut State Historic Preservation Office works to preserve and protect historic sites that are related to minority group history.

Consideration of cultural resources is an integral part of the town planning and design review, a process that we fully support. The HDC reviewed the letters and memorandums from the Planning Commission (July 12, 2017), the Design Review Board (July 31, 2017), and the Historical Society (July 20, 2017), and our recommendations are in keeping with all of theirs. The proposed Tobacco Valley Solar project would contribute to the economic development of the town and solar energy production would seem to be in keeping with 2007 Plan of Conservation and Development (POCD)'s focus on "green building" technologies. In our opinion, however, the project would meet those goals at the considerable cost of other stated goals of the POCD. As currently proposed, the Tobacco Valley Solar plan does not meet the objectives of protection of open space, agricultural resources, historic resources, scenic resources, and community character.

Based on the limited information available during this early design phase of the project, the HDC recommends that additional research be conducted and that the design be modified to minimize its impacts on identified cultural resources, the rural historic landscape, and the agricultural character of the community:

- Conduct additional research on Martin Luther King's connection to the Cullman Brother's properties and confirm the location of the farm(s) where he worked in 1944 and 1947.
- Alter the solar array layout in order to retain all five tobacco sheds, with appropriate setbacks from the buildings. Conduct conditions assessments of the sheds and explore possibilities for their adaptive reuse. Consider allocating some space to be used for interpretive exhibit space on the Cullman farms and their laborers. Prepare maintenance plans for the buildings that will be retained.
- Explore alternative screening strategies to the proposed 10'-0" solid vinyl fence, which is not in keeping with the natural rural character of the project site. We suggest tailoring the screening to each area, including a mix of berms planted with appropriate vegetation, naturalistic groupings of indigenous trees and plants, and wooden rail fencing. In areas where completely concealing the solar panels is difficult, it could be preferable to use rail fencing and trees to distract the viewer's eye rather than to hide the panels behind a solid high fence. Give particular care to screening the solar arrays from view around the historic properties at 85 and 100 Hoskins Road.
- Conduct shovel pit testing to assess the National Register eligibility of Site 128-52 and Locus 1 archaeological areas. Conduct walkover surveys of areas that have been identified with moderate archaeological sensitivity, with auger testing as recommended in the cultural resources survey.
- Commission an independent study to analyze the potential for light and noise pollution on adjacent properties.

Sincerely,



Marguerite Carnell

Vice Chair, Simsbury Historic District Commission