



October 24, 2016

Matt Butler, Outreach Manager
Siting, Efficiency, and Renewable Energy Division
Rates and Analysis Department
Public Utilities Commission of Ohio | Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

Dear Mr. Butler,

This is in response to information we received from the Ohio Power Siting Board on September 23, 2016. This information was regarding the posting of rules on the agency's Docking Information System website for amending rules for certification of applications for electric generation facilities pursuant to Ohio Administrative Code 4906-4-08 and 4906-4-09.

The Ohio State Historic Preservation Office, Ohio History Connection (SHPO), offers our comments pursuant to Ohio Revised Code 149.53 and pursuant to the amended proposed rules. The SHPO is named within the rules to assist the Ohio Power Siting Board with completing a thorough review of applications. The amended rules require applicants to take a slightly broader view when identifying important natural and cultural resources in and around a proposed facility. We believe that this will help ensure a more clearly focused context for the evaluation of resources that is needed to recognize cultural landmarks (proposed OAC 4906-4-08 (D) (1) and (2)). As part of our responsibilities under the National Historic Preservation Act and other federal and state laws, the SHPO has already developed and has in place survey guidelines that provide the flexibility required to effectively and efficiently identify cultural landmarks within large survey areas. In addition, the SHPO works on a daily basis with many different types of projects that require a thoughtful balancing of the needs for protecting and preserving important cultural resources with the justification and needs for the proposed project. We have a proven capacity to work with agencies such as the Ohio Power Siting Board and applicants in developing mitigation plans (see proposed OAC 4906-4-09 (C) (5)) that achieve the important balance that is required under proposed OAC 4906-4-08 (D) (2).

Prior to receiving the amended rules, the SHPO had admittedly not given detailed thought to developing standards and policies to address the possibility of a future dismantling, decommissioning, and removal of a constructed Wind Farm. The amended rules provide a straightforward process for guiding the dismantling of a Wind Farm beginning with the review of the plan to dismantle and ending with the final clean-up and landscaping (see proposed OAC 4906-4-09 (I)).

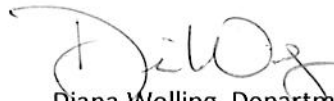
Please correct us if we are mistaken in our interpretation of OAC 4906-4-09: It is our read that the mitigation plan specified under proposed OAC 4906-4-08 (D) (2) and proposed OAC 4906-4-09 (C) (5) could include the condition that further consultation with the SHPO is required prior to the initiation of dismantling.

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The SHPO believes that the amended rules for Wind Farms will strengthen efforts to meaningfully preserve important cultural resources. It is our experience that preservation is best served through partnerships, and we believe that the amended rules provide a foundation for the SHPO and the Ohio Power Siting Board to work together to make sure that our important places are preserved for future generations of Ohioans.

Please direct any questions regarding this matter to David Snyder, Archaeology Reviews Manager, Resource Preservation and Review, State Historic Preservation Office at 614.298.2000 or at dsnyder@ohiohistory.org.

Sincerely

A handwritten signature in dark ink, appearing to read 'D. Welling', with a stylized flourish at the end.

Diana Welling, Department Head
Resource Protection and Review
State Historic Preservation Office

DW/ds

This foregoing document was electronically filed with the Public Utilities

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Summary: Comments electronically filed by Mr. Matt Butler on behalf of Ohio State Historic Preservation Office, Ohio History Connection (SHPO)