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November 18, 2016

*Via Electronic Filing*

Ms. Barcy McNeal  
Public Utilities Commission of Ohio  
Administration/Docketing  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, OH 43215-3793

**Re: Trishe Wind Ohio, LLC, Case No. 13-197-EL-BGN**

Dear Ms. McNeal:

The December 16, 2013 Opinion, Order, and Certificate approving Northwest Ohio Wind Energy, LLC's [now known as Trishe Wind Ohio, LLC ("Trishe")] Certificate of Environmental Compatibility and Public Need ("Certificate") and the October 1, 2013 Supplement to Amended Application ("Supplement") established a set of conditions and supplemental commitments as part of the Certificate.

Within this set of conditions and commitments, **Supplement Commitment No. 1** requires that:

**Prior to commencement of construction, Applicant will develop a cultural resource avoidance plan in consultation with OPSB Staff and the OHPO, detailing procedures for flagging and avoiding all potentially NRHP-eligible archaeological sites in the [2016 Construction] area. The avoidance plan will also contain measures to be taken should previously unidentified archaeological deposits or artifacts be discovered during the [Second Construction].**

In compliance with Supplement Commitment No. 1, attached is a copy of the cultural resource avoidance plan for the 2016 phase of construction. Thus, this letter is to inform the OPSB Staff that Trishe is in compliance with the above-mentioned commitment for this phase of construction.

If you have any questions please call at the number listed above.

Sincerely,

Sally W. Bloomfield

Attachment

cc: Andrew Conway (w/Attachment)  
Grant Zeto (w/Attachment)

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## Cultural Resources Avoidance Plan

Construction of access roads and excavation of foundations for Turbines T-39, T-40, T-46, T-48, T-49 and T-55 will not affect any cultural resources identified during the Phase I Archaeological Investigation performed by Weller & Associates, Inc. (documented in Appendix Q of the amended CECPN application). This survey included 150 foot wide corridors encompassing all of the turbine access roads that will be constructed during this initial phase of the project. Access roads will be 16 feet wide and grading limits will be limited to 50 feet wide (i.e. 25 feet on either side of the access road centerline). No cultural resources potentially eligible for the National Register of Historic Places (NRHP) were identified during the field investigation of Phase II access road corridors.

If previously unknown cultural resources are encountered during access road construction, construction work will temporarily cease and a qualified archaeologist will be brought in to examine the site, ascertain the site boundaries and determine the need for further work. The evaluation may have one of several possible outcomes:

- (1) If the archaeologist finds that the site appears to have integrity and potential for significance, the access road design may be revised slightly to avoid the site entirely. Any such revised access road alignment would be placed in a location that has already been surveyed and cleared for cultural resources.
- (2) The archaeologist may determine the site is not significant or does not have integrity. However, if avoidance is readily achievable, the access road design may be revised slightly to avoid the site entirely. Any such revised access road alignment would be placed in a location that has already been surveyed and cleared for cultural resources. If avoidance of the site is not readily achievable, the archaeologist will write a letter report explaining his/her reasoning regarding the site's lack of integrity and/or significance. If OHPO concurs, construction work will recommence on the original access road alignment as soon as that concurrence is received. If additional data or survey work is requested by OHPO, the archaeologist would supply the additional data and survey results in a supplemental report and concurrence would again be requested. Again, construction work would recommence upon OHPO concurrence.
- (3) If the site has integrity, is potentially significant and cannot be avoided, the archaeologist may recommend that Phase II Evaluative Testing be conducted to determine whether the site is eligible for the National Register of Historic Places. Consultation on the scope of work for Phase II Evaluative Testing would be undertaken with OHPO and would be initiated upon OHPO's concurrence. Based on the results of Phase II testing, appropriate mitigation measures would be developed in consultation with OHPO. Construction of the applicable section of access road would recommence once the agreed upon mitigation has been accomplished and confirmed by OHPO to be satisfactory.

If the unanticipated discovery involves potential human remains, the archaeologist will immediately notify OHPO. Local law enforcement authorities will also be contacted to obtain confirmation that any such remains are historic and do not represent a potential crime scene. The State of Ohio does not have regulations regarding the handling of unanticipated historic human burials that may be encountered during construction projects. However, if an unanticipated discovery is confirmed to contain human remains, the site will be treated as a potentially

## Cultural Resources Avoidance Plan

significant archaeological site. The remains will be left in place, the site delineated and the access road alignment will be modified to avoid the site if possible. Orange snow fence will be placed to delineate the site to facilitate avoidance and will be removed immediately upon completion of construction. If avoidance is not possible, appropriate mitigation measures will be developed in consultation with OHPO. Construction of the applicable section of access road would not recommence until the agreed upon mitigation has been accomplished and confirmed by OHPO to be satisfactory.