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February 6, 2017

*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: Hog Creek Wind Farm LLC,  
Case Nos. 10-654-EL-BGN, 16-1422-EL-BGA and 16-1423-EL-BGA**

Dear Ms. McNeal:

On August 29, 2011, the Ohio Power Siting Board ("OPBS") issued Hog Creek Wind Farm LLC ("Hog Creek") a Certificate of Environmental Compatibility and Public Need. The order established a set of conditions as part of the certificate.

Within these sets of conditions, **Condition No. 15** requires that:

**Prior to construction. Hog Creek shall conclude its ongoing archaeological Phase I survey work for the Hog Creek Wind Farm II project area. If the resulting survey work discloses a finding of cultural or archaeological significance, or a site that could be eligible for inclusion on the NRHP, then Hog Creek shall submit an amendment, modification, or mitigation plan for staff's acceptance. Any such mitigation effort shall be developed in coordination with the OHPO, with input from the Hardin County Historical Society, and submitted to staff for review and acceptance.**

In compliance with Condition No. 15, attached is a copy Addendum No. 1: Archaeological Survey dated February 2017.

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

Sincerely,

Sally W. Bloomfield

Attachment

cc: Andrew Conway (w/Attachment)  
Jonathan Pawley (w/Attachment)



February 3, 2017

Mr. Mark J. Epstein, Department Head  
Resource Protection and Review  
Ohio Historic Preservation Office  
800 E. 17<sup>th</sup> Avenue  
Columbus, OH 43211-2497

**Subject: Addendum No. 1: Phase I Archaeological Survey and Partial Fulfilment of Memorandum of Understanding  
Hog Creek Wind Project  
Hardin County, Ohio  
Ohio Power Siting Board (OPSB) Case Nos. 16-1421-EL-BGA and 16-12422-EL-BGA**

Dear Mr. Epstein:

Tetra Tech, on behalf of Hog Creek Wind Project, LLC (Hog Creek), a subsidiary of Renewable Energy Systems Americas Inc. (RES Americas), is please to submit the results of an addendum Phase I Archaeological Survey for the proposed Hog Creek Wind Project in Hardin County. The addendum investigation resulted from several minor facility shifts including those recommended for avoidance of archaeological sites 33HR308, 33HR309, and 33HR310. Following the methodology presented in the 2016 Phase I Archaeological Survey (and approved by the SHPO), Tetra Tech conducted an additional Phase I Archaeological Survey of areas that had an increased potential to contain undocumented archaeological resources. Tetra Tech is submitting these results as partial fulfilment of the Memorandum of Understanding (MOU) between Hog Creek, SHPO, and Hardin County Historical Museums, Inc., and as part of the commitments outlined in the 2016 (revised January 2017) Phase I Archaeological Survey for the Hog Creek Wind Project.

Tetra Tech is also submitting an email confirmation from Ms. Linda L. Iams, Director of the Hardin County Historical Museums, confirming receipt of the \$20,000.00 payment indicated in the MOU. This payment fulfills Stipulation I of the MOU. This payment fulfills Stipulation I of the MOU.

We would appreciate a response within 30 days of receipt of this letter indicating concurrence with the results presented in the addendum Phase I Archaeological Survey, and confirmation that Stipulation I of the MOU has been fulfilled.

If you have any questions, please contact me at 612-643-2237.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Holven'.

Adam Holven  
Tetra Tech, Inc.  
2001 Killebrew Drive, Suite 141  
Bloomington, MN 55425

Enclosures (2)

**Addendum No.1:**  
**Phase I Archaeological Survey**  
**Hog Creek Wind Project**  
**Hog Creek Wind Project, LLC**  
**Hardin County, Ohio**

Case No. 16-1421-EL-BGA and Case No.16-12422-EL-BGA



**February 2017**

**PREPARED FOR**

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**Hog Creek Wind Project, LLC**  
330 2nd Ave. South, Suite 820  
Minneapolis, Minnesota 55401



**PRESENTED BY**

---

**Tetra Tech, Inc.**  
2001 Killebrew Drive, Suite 141  
Bloomington, MN 55425



## MANAGEMENT SUMMARY

Hog Creek Wind Project, LLC (Hog Creek), a subsidiary of Renewable Energy Systems Americas Inc. (RES Americas), is scheduled to construct the Hog Creek Wind Project (the Project), located approximately 4 miles (mi) (6.4 kilometers [km]) northeast of Ada in Hardin County, Ohio, in 2017. Tetra Tech, on behalf of RES Americas, submitted an initial Phase I Archaeological Survey to the Ohio State Historic Preservation Office (SHPO) on November 18, 2016 (Holven et al. 2016). The SHPO response letter dated December 29, 2016 provided comment on the Phase I Archaeological Survey submitted in November 2016, as well as on previously recorded sites and the conditions of the Memorandum of Understanding (MOU). Regarding the Phase I Archaeological Survey, the SHPO indicated approval of the survey design and agreement with the recommendation to avoid Sites 33HR308, 33HR309, and 33HR310.

Due to site avoidance, Project facilities and the associated Construction Easement (dated September 30, 2016), hereafter referred to as the September 2016 Construction Easement, were routed around the known extent of Sites 33HR308, 33HR309, and 33HR310 and beyond areas that were surveyed during the initial Phase I Archaeological Survey (i.e., the survey corridor based on the July 2016 Construction Easement). These changes included:

- Shifting the proposed access road from Township Road 85 to Turbine 30 south of Site 33HR308, and shifting portions of the turbine staging area to the east side of Turbine 30;
- Shifting the proposed access road from Township Road 95 to Turbine 18 south of Site 33HR309, and adding a new access road to Turbine 19; and
- Shifting the proposed crane path between Turbine 21 and Turbine 34 to the east of Site 33HR310.

Additional modifications in the September 2016 Construction Easement include:

- New turning radius located at Highway 68 and County Road 14;
- Shifting the turning radius located at County Road 14 and Township Road 85 from the southwest corner of the intersection to the southeast corner;
- Shifting the turning radius located at County Road 14 and Township Road 95 from the southeast corner of the intersection to the southwest corner;
- Additional areas at the turning radius located at County Road 81 and Township Road 95; and
- Additional staging areas for Turbine 18 and Turbine 31.

These changes include 21.3 acres (ac) (8.6 hectares [ha]) of new areas not included in the initial Phase I Archaeological Survey.

The areas selected for field survey were determined based on a sample strategy that took into account landforms, soils, and the presence of known archaeological resources (Holven et al. 2016). For this investigation, this included the following areas:

- 
- The revised access road from Township Road 85 to Turbine 30, and the revised turbine staging area on the east side of Turbine 30, both located adjacent to Site 33HR308;
  - The revised access road from Township Road 95 to Turbine 18 adjacent to Site 33HR309;
  - The revised crane path between Turbine 21 and Turbine 34 adjacent to 33HR310;
  - The revised turning radius at County Road 14 and Township Road 85 located in a high archaeological sensitivity area;
  - The revised turning radius at County Road 14 and Township Road 95 located in a high archaeological sensitivity area; and
  - The additional staging area for Turbine 31 located in a high archaeological sensitivity area.

These areas constitute the Addendum No.1 Survey Corridor and include 18.6 ac (7.5 ha) or 87 percent of the September 2016 Construction Easement not previously surveyed. The remaining 2.7 ac (1.1 ha) of the previously unsurveyed parts of the September 2016 Construction Easement were in low archaeological sensitivity areas and were not surveyed as part of this investigation.

Surface visibility in December 2016 was greater than 50 percent in the Addendum No.1 Survey Corridor and pedestrian survey was utilized to assess the presence or absence of archaeological resources. No archaeological resources were documented in the Addendum No.1 Survey Corridor. Additionally, shovel testing was not deemed necessary. Tetra Tech recommends per Ohio Administrative Code 4906-04-06(D), that no archaeological sites will be affected by the updated Project facilities listed above (and no impacts are anticipated from the overall Project as currently proposed).

If areas beyond the September 2016 Construction Easement are to be used during construction of the Project, then Tetra Tech recommends that these areas be reevaluated for the potential to contain archaeological materials and surveyed, if deemed appropriate, following the field survey methodology outlined in Holven et al. 2016. The results of any future investigation will be presented in an addendum report for SHPO review.

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## **APPENDICES**

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### **APPENDIX A. FIGURES**

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Figure 2 – Addendum No.1 Survey Corridor

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### **APPENDIX C. PHOTOGRAPHS**

### **APPENDIX D. 2017 UNANTICIPATED DISCOVERIES PLAN**

## ACRONYMS/ABBREVIATIONS

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Acronyms/Abbreviations	Definition
GIS	Geographic Information System
GPS	Global Positioning System
MOU	Memorandum of Understanding
OAC	Ohio Administrative Code
SHPO	Ohio State Historic Preservation Office
OPSB	Ohio Power Siting Board
Project	Hog Creek Wind Project



## 1.0 INTRODUCTION

Hog Creek Wind Project, LLC (Hog Creek), a subsidiary of Renewable Energy Systems Americas Inc. (RES Americas), is scheduled to construct the Hog Creek Wind Project (the Project), located approximately 4 miles (mi) (6.4 kilometers [km]) northeast of Ada in Hardin County, Ohio, in 2017 (Appendix A, Figure 1). Tetra Tech, on behalf of RES Americas, submitted an initial Phase I Archaeological Survey to the Ohio State Historic Preservation Office (SHPO) on November 18, 2016 (Holven et al. 2016). The SHPO response letter dated December 29, 2016 provided comment on the Phase I Archaeological Survey submitted in November 2016, as well as on previously recorded sites and the conditions of the Memorandum of Understanding (MOU). Regarding the Phase I Archaeological Survey, the SHPO indicated approval of the survey design and agreement with the recommendation to avoid Sites 33HR308, 33HR309, and 33HR310 (Appendix B).

### 1.1 PROJECT BACKGROUND

The Project was originally permitted by the Ohio Power Siting Board (OPSB) in two separate cases, Case No. 09-277-EL-BGN (Hog Creek I Wind) and Case No. 10-654-EL-BGA (Hog Creek II Wind). A Phase I Archaeological Survey was previously conducted for the Hog Creek I and II Wind Projects on behalf of the previous Project owner, JUWI Wind/Great Lakes Wind, LLC, by Hardline Design Company (HDC) for portions of the previous construction easement between June 2011 and January 2012 (Appendix A, Figure 2). A final report outlining the findings of this survey was submitted to the SHPO on July 10, 2012. This report received SHPO concurrence on August 8, 2012 with the condition that an archaeological avoidance plan be developed for Sites 33HR267 and 33HR279 (Appendix B), which were avoided after discovery, but were still located in the Project vicinity. A Memorandum of Understanding (MOU) was also completed between Hog Creek, SHPO, and Hardin County Historical Museums, Inc. that same month (Appendix B). However, the Project was never constructed, and in 2016, the Project was sold to RES Americas, which subsequently redesigned the Project to accommodate updated turbine technology and to conform to current Ohio setback regulations. The Project redesign resulted in a reduction in the number of turbines and new turbine and supporting facility locations.

From July through September 2016, Tetra Tech conducted a Phase I Archaeological Survey for the Project (Holven et al 2016). Three archaeological resources (Sites 33HR308, 33HR309, and 33HR310) were identified during this Phase I Archaeological Survey and were recommended for avoidance.

### 1.2 UPDATED PROJECT FACILITIES AND SEPTEMBER 2016 CONSTRUCTION EASEMENT

Due to site avoidance, Project facilities and the associated Construction Easement (dated September 30, 2016), hereafter referred to as the September 2016 Construction Easement, were routed around the known extent of Sites 33HR308, 33HR309, and 33HR310 and beyond areas that were surveyed during the Phase I Archaeological Survey conducted in July and September 2016 (Appendix A, Figures 1, 2, and 3). These changes included:

- Shifting the proposed access road from Township Road 85 to Turbine 30 south of Site 33HR308, and shifting portions of the turbine staging area to the east side of Turbine 30;

- Shifting the proposed access road from Township Road 95 to Turbine 18 south of Site 33HR309, and adding a new access road to Turbine 19; and
- Shifting the proposed crane path between Turbine 21 and Turbine 34 to the east of Site 33HR310.

Additional modifications to September 2016 Construction Easement included:

- New turning radius located at Highway 68 and County Road 14;
- Shifting the turning radius located at County Road 14 and Township Road 85 from the southwest corner of the intersection to the southeast corner;
- Shifting the turning radius located at County Road 14 and Township Road 95 from the southeast corner of the intersection to the southwest corner;
- Additional areas at the turning radius located at County Road 81 and Township Road 95; and
- Additional staging areas for Turbine 18 and Turbine 31.

These changes include 21.3 acres (ac) (8.6 hectares [ha]) of new areas not included in the initial Phase I Archaeological Survey.

### 1.3 ADDENDUM NO.1 SURVEY CORRIDOR

The areas selected for field survey were determined based on a sample strategy that took into account landforms, soils, and the presence of known archaeological resources (Holven et al. 2016). For this investigation, this included the following areas:

- The revised access road from Township Road 85 to Turbine 30, and the revised turbine staging area on the east side of Turbine 30, both located adjacent to Site 33HR308;
- The revised access road from Township Road 95 to Turbine 18 adjacent to Site 33HR309;
- The revised crane path between Turbine 21 and Turbine 34 adjacent to 33HR310;
- The revised turning radius at County Road 14 and Township Road 85 located in a high archaeological sensitivity area;
- The revised turning radius at County Road 14 and Township Road 95 located in a high archaeological sensitivity area; and
- The additional staging area for Turbine 31 located in a high archaeological sensitivity area.

These areas constitute the Addendum No.1 Survey Corridor and include 18.6 ac (7.5 ha) or 87 percent of the September 2016 Construction Easement not previously surveyed (Appendix A, Figures 2 and 3). The remaining 2.7 ac (1.1 ha) of the previously unsurveyed parts of the September 2016 Construction Easement are in low archaeological sensitivity areas and were not surveyed as part of this investigation.

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## 1.4 AGENCY INVOLVEMENT AND REGULATORY REQUIREMENTS

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The Project will require an amendment to its certificates to install and operate wind-powered electric generation facilities from the Ohio Power Siting Board (OPSB) (Case No. 16-1421-EL-BGA and Case No.16-12422-EL-BGA); therefore, the Project is subject to review by the SHPO under Ohio Administrative Code (OAC) 4906-04-08 – Health and Safety, Land Use and Ecological Information (State of Ohio 2016).

OAC 4906-04-08 states the OPSB shall be guided by, but is not limited to, several considerations, where applicable, to aid the evaluation and designation of sites, corridors, and routes. Item D of OAC 4906-04-08 includes the effect of the proposed site or route on existing scenic areas, historic sites and structures, and archaeological sites.

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## 1.5 ORGANIZATION OF THE REPORT

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This report details the research methods, archaeological field survey results, recommendations, and conclusions. Mr. Adam Holven served as Principal Investigator, and Britt McNamara and Adam Holven served as authors. Four appendices provide supporting documentation and include: Appendix A – Figures; Appendix B – Previous SHPO Communications; Appendix C – Photographs; and Appendix D – 2017 Unanticipated Discoveries Plan.

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## 2.0 METHODS

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The purpose of this investigation is to provide the necessary information for the SHPO review of the Project by confirming the presence or absence of archaeological sites within surveyed areas of the September 2016 Construction Easement. All work was conducted in accordance with the Ohio SHPO Archaeological Guidelines (SHPO 1994), as well as the archaeological avoidance plan developed for Sites 33HR267 and 33HR279, and the MOU between Hog Creek, SHPO, and Hardin County Historical Museums, Inc. (Appendix B).

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## 2.1 FIELD METHODS

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A full description of the survey methodology and field methods can be found in Holven et al. 2016.

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### 2.1.1 Pedestrian Survey

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A systematic pedestrian surface survey was conducted in the Addendum No.1 Survey Corridor to determine the presence of artifacts or features on the surface. Where ground visibility was greater than 50 percent, 10-m (32.8-ft) interval transects were utilized, and where ground visibility was less than 50 percent, 5-m (16.4-ft) interval transects were utilized. A Trimble GeoXH 6000 Series global positioning system (GPS) unit operating ESRI ArcPad was used to navigate the Addendum No.1 Survey Corridor. Navigational accuracy was confirmed through the comparison of land parcels on the GPS and fence lines representing those boundaries during the survey. Land use, ground cover, and surface visibility were also documented during the pedestrian survey.

### 3.0 RESULTS OF THE ARCHAEOLOGICAL SURVEY

The pedestrian field survey for the Addendum No.1 Survey Corridor was conducted on December 6, 2016 by staff from Tetra Tech.

#### 3.1 LAND USE AND SURFACE CONDITIONS DURING THE PEDESTRIAN SURVEY

Land use within the Addendum No.1 Survey Corridor was harvested and tilled agricultural cropland (Appendix C, Photographs 1 through 4). Surface visibility was generally good to excellent. At the completion of the survey, 18.6 ac (7.5 ha), or 100 percent, of the Addendum No.1 Survey Corridor had been surveyed with surface visibility conditions greater than 50 percent.

No archaeological resources were documented during the pedestrian survey within the Addendum No.1 Survey Corridor. Additionally, shovel testing was not deemed necessary.

### 4.0 RECOMMENDATIONS

No archaeological resources were documented in the Addendum No.1 Survey Corridor (and no impacts are anticipated from the overall Project as currently proposed). Tetra Tech recommends per Ohio Administrative Code 4906-04-06(D), that no archaeological sites will be affected by the updated Project facilities listed above.

#### 4.1 ADDITIONAL ACTIVITIES REGARDING PREVIOUSLY DOCUMENTED ARCHAEOLOGICAL RESOURCES AND SURVEYS

Avoidance of Sites 33HR267, 33HR279, 33HR308, 33HR309, and 33HR310 is recommended for all Project activities including construction, as well as preconstruction activities such as surveying and staking the proposed layout. Due to the proximity of Sites 33HR308, 33HR309, and 33HR310 to the Construction Easement, Tetra Tech recommends delineating these site boundaries with high-visibility snow fencing prior to any ground-disturbing activities. ArcGIS shapefiles of these avoidance areas have been provided to Hog Creek. Hog Creek will ensure the avoidance areas are delineated with high-visibility snow fencing and that the preconstruction condition of each site is photo-documented. Instructions including detailed maps and shapefiles regarding the construction of Project facilities in and around the avoidance areas will be provided to contractors working on the Project. Hog Creek will monitor fencing around the avoidance areas during construction and repair any damaged fencing and report any significant impacts to the sites to the SHPO. At the completion of construction, fencing will be removed and post-construction photographs will be taken of the sites.

Sites 33HR267 and 33HR279 will also be monitored during construction but not fenced. Both sites were documented during previous iterations of the Hog Creek layout and are no longer in the immediate vicinity of the Construction Easement. Hog Creek currently has the avoidance shapefiles for these sites. The preconstruction condition of each site will be photo-documented. Instructions including detailed maps and

avoidance shapefiles will be provided to contractors working on the Project. At the completion of construction, post-construction photographs will be taken of the sites.

Per the MOU (Section IV), Hog Creek shall provide an annual report that outlines the commitments in the MOU, including the avoidance of archaeological sites (Appendix B). At a minimum, the report will provide pre- and post-construction conditions of the avoided archaeological sites.

An Archaeological Avoidance Plan has been developed and approved by the SHPO to outline the avoidance procedures for Sites 33HR267 and 33HR279 and to accommodate any unanticipated archaeological materials that may be unearthed during the construction of the Project (Appendix B). Likewise, an unanticipated discoveries plan has been developed that provides instructions and contact information for Hog Creek and its contractors in the event cultural materials are inadvertently unearthed during construction (Appendix E). Additionally, per the MOU (Section III), if a potential Historic Landmark is discovered, or unanticipated efforts on a previously identified Historic Landmark are found, Hog Creek should notify the SHPO within 48 hours of the discovery. The jobsite will be secured and all work will be suspended in the vicinity of the affected resource. Hog Creek will consult with the SHPO to resolve adverse effects.

If areas beyond the September 2016 Construction Easement are to be used during construction, then Tetra Tech recommends that these areas be reevaluated for the potential to contain archaeological materials and surveyed, if deemed appropriate, following the field survey methodology outlined in Holven et al. 2016. The results of any future investigation will be presented in an addendum report for SHPO review.

## 5.0 REFERENCES

Holven, Adam C., and Peer Halvorsen, Britt McNamara, Emily Shepard, and Chelsea Starke  
2016 (revised 2017) Hog Creek Wind Project, Hog Creek Wind Project, LLC., Hardin County, Ohio, Phase I  
Archaeological Survey, Case No. 16-1421-EL-BGA and Case No. 16-12422-EL-BGA. Manuscript on file  
the Ohio State Historic Preservation Office, Columbus.

Ohio State Historic Preservation Office

1994 *Archaeology Guidelines*. Ohio Historical Society, Columbus, Ohio.

State of Ohio

2016 *Chapter 4906-1 General Provisions*. Electronic document, <http://codes.ohio.gov/oac/4906-1>, accessed  
September 12, 2016.

## APPENDIX A – FIGURES

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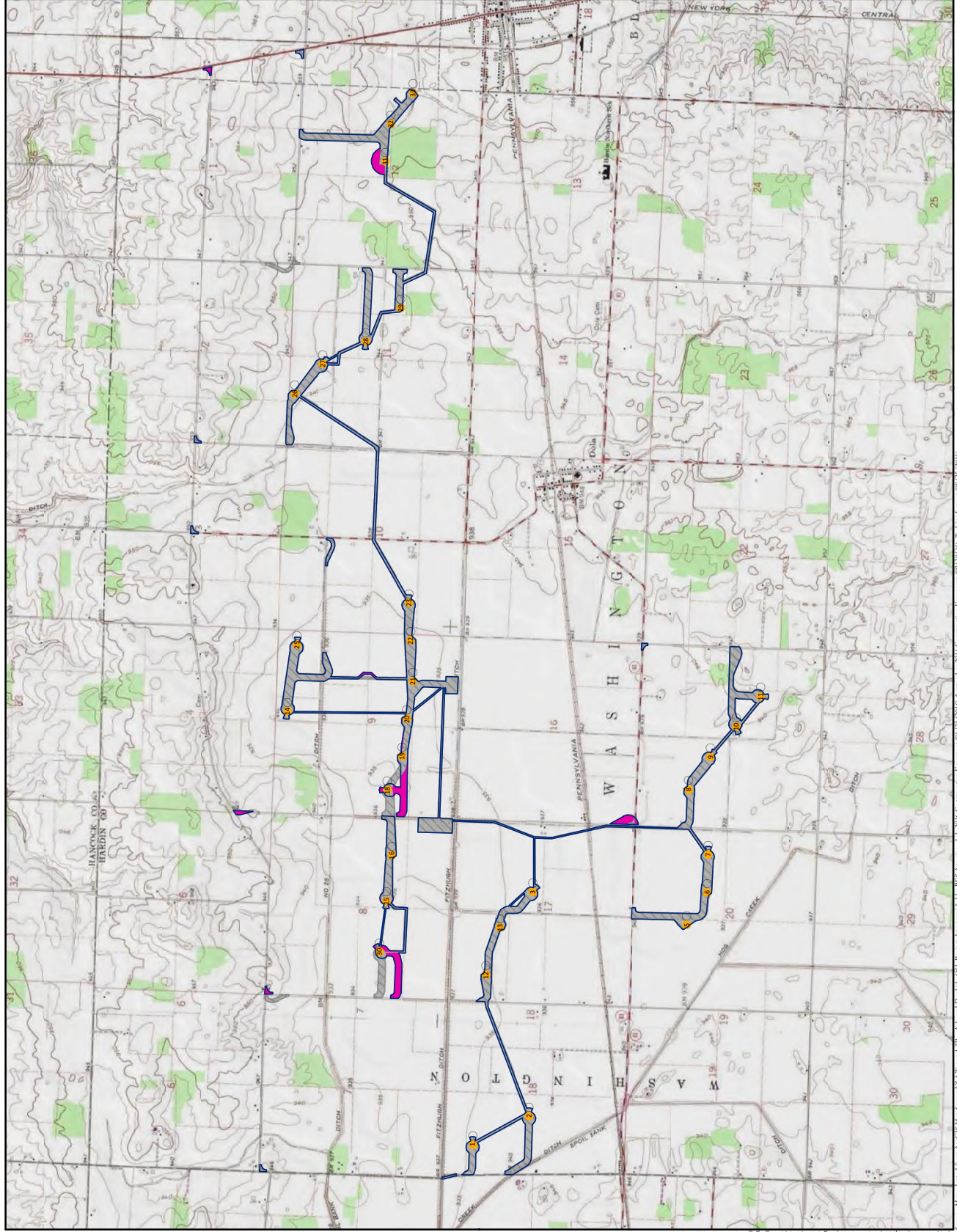
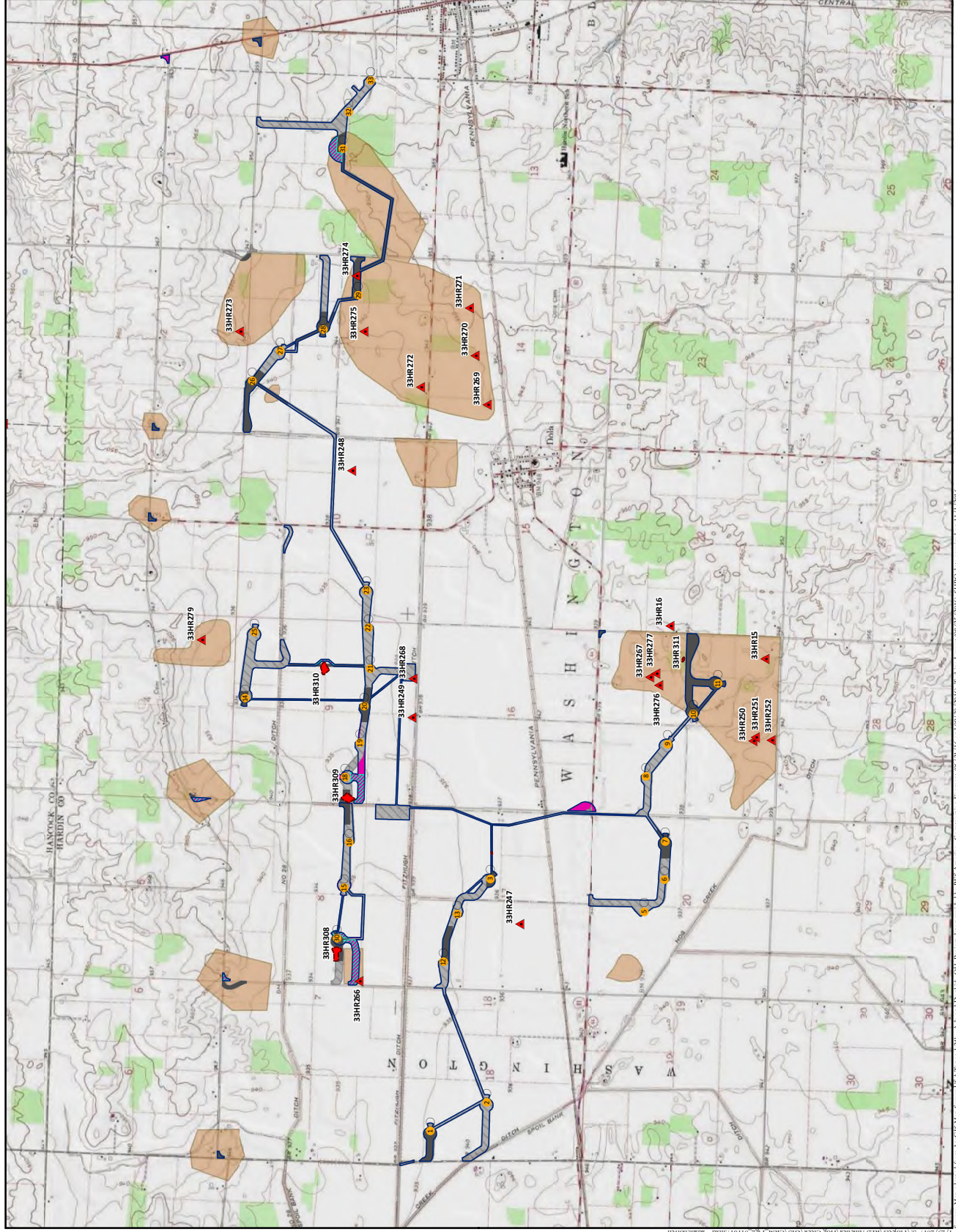


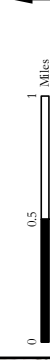
Figure 1  
July and September 2016  
Construction Easements  
Hog Creek Wind Farm  
Hardin County, Ohio







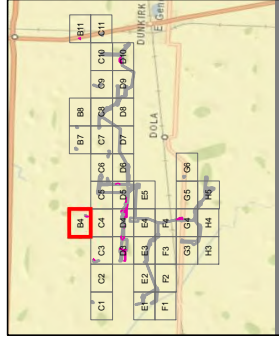
- Construction Easements**
- September 2016 Construction Easement
  - July 2016 Construction Easement
  - Areas Not Included in the July 2016 Construction Easement
- Proposed Project Facilities**
- Planned Turbine
  - High Sensitivity Area
  - Addendum No.1 Survey Corridor
- Survey Results**
- Previously Surveyed (Holven et al. 2016)
  - Previously Documented Resource
  - Archaeological Site
  - Archaeological Site



**Figure 2**  
**Surveyed Areas**  
**Addendum No.1 Survey Corridor**  
**Hog Creek Wind Project**  
**Hardin County, Ohio**







### Construction Easements

- September 2016 Construction Easement
- July 2016 Construction Easement
- Areas Not Included in the July 2016 Construction Easement
- Addendum No.1 Survey Corridor
- Previously Surveyed (Holven et al. 2016)

### Proposed Project Facilities

- Planned Turbine
- Planned Collection Line
- Planned Service Road
- Planned Crane Path
- O&M Building/Substation
- Laydown Area

### Previously Documented Resource

- ▲ Archaeological Site
- Archaeological Site

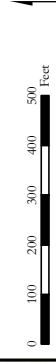
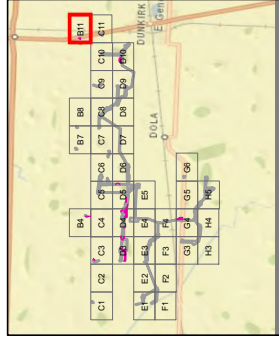


Figure 3 - B4  
Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio







### Construction Easements

- September 2016 Construction Easement
- July 2016 Construction Easement
- Areas Not Included in the July 2016 Construction Easement
- Addendum No.1 Survey Corridor
- Previously Surveyed (Holven et al. 2016)

### Proposed Project Facilities

- Planned Turbine
- Planned Collection Line
- Planned Service Road
- Planned Crane Path
- O&M Building/Substation
- Laydown Area

### Previously Documented Resource

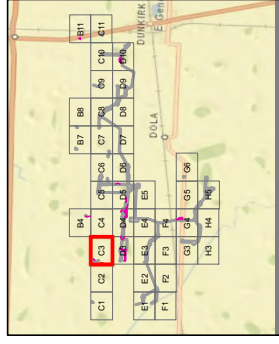
- Archaeological Site
- Archaeological Site








Figure 3 - B11  
Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio







## Construction Easements

-  September 2016 Construction Easement  
 July 2016 Construction Easement  
 Areas Not Included in the July 2016 Construction Easement  
 Addendum No.1 Survey Corridor  
 Previously Surveyed (Holven et al. 2016)

### Proposed Project Facilities

- Planned Turbine
- Planned Collection Line
- Planned Service Road
- Planned Crane Path
- ▨ O&M Building/Substation
- ▨ Laydown Area

### Previously Documented Resource

- ▲ Archaeological Site  
■ Archaeological Site

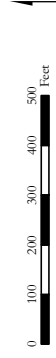
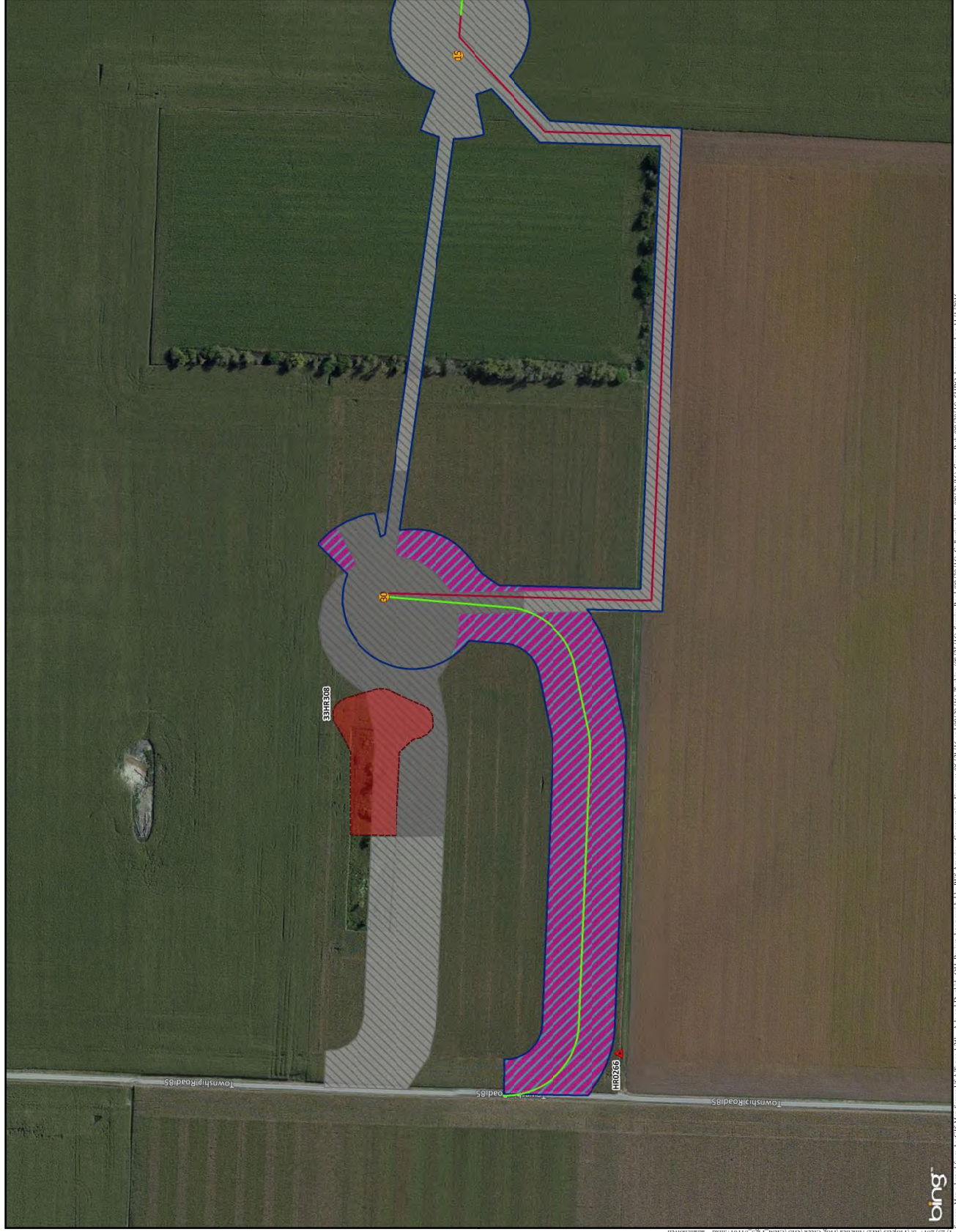


Figure 3 - C3  
Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio



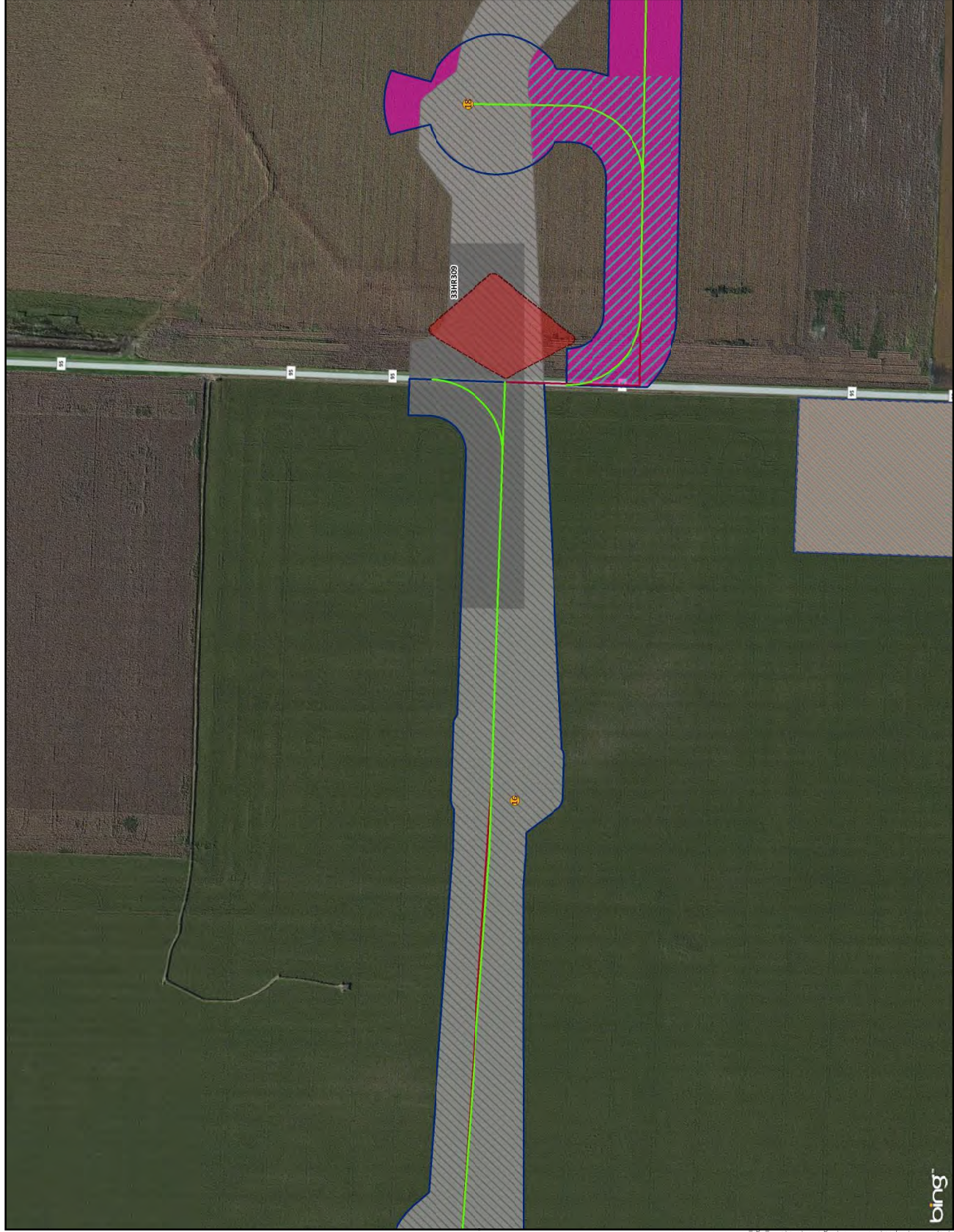


- Construction Easements**
- September 2016 Construction Easement
  - July 2016 Construction Easement
  - Areas Not Included in the July 2016 Construction Easement
  - Construction Easement
  - Addendum No.1 Survey Corridor
  - Previously Surveyed (Holven et al. 2016)
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- Planned Turbine
  - Planned Collection Line
  - Planned Service Road
  - Planned Crane Path
  - O&M Building/Substation
  - Laydown Area
- Previously Documented Resource**
- Archaeological Site
  - Archaeological Site



Figure 3 - D3  
Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio





#### Construction Easements

- September 2016 Construction Easement
- July 2016 Construction Easement
- Areas Not Included in the July 2016 Construction Easement
- Construction Easement
- Addendum No.1 Survey Corridor
- Previously Surveyed (Holven et al. 2016)

#### Proposed Project Facilities

- Planned Turbine
- Planned Collection Line
- Planned Service Road
- Planned Crane Path
- O&M Building/Substation
- Laydown Area

#### Previously Documented Resource

- ▲ Archaeological Site
- Archaeological Site

Figure 3 - D4

Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio







#### Construction Easements

- September 2016 Construction Easement
- July 2016 Construction Easement
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- Construction Easement
- Addendum No.1 Survey Corridor
- Previously Surveyed (Holven et al. 2016)

#### Proposed Project Facilities

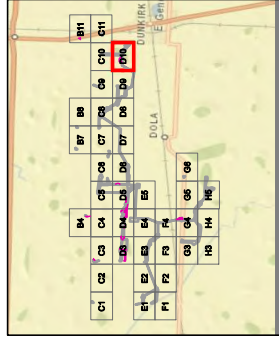
- Planned Turbine
- Planned Collection Line
- Planned Service Road
- Planned Crane Path
- ▭ O&M Building/Substation
- ▭ Laydown Area
- ▲ Previously Documented Resource
- ▲ Archaeological Site
- Archaeological Site



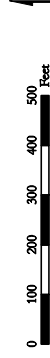
Figure 3 - D5  
Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio







- Construction Easements**
- September 2016 Construction Easement
  - July 2016 Construction Easement
  - Areas Not Included in the July 2016 Construction Easement
  - Construction Easement
  - Addendum No.1 Survey Corridor
  - Previously Surveyed (Holven et al. 2016)
- Proposed Project Facilities**
- Planned Turbine
  - Planned Collection Line
  - Planned Service Road
  - Planned Crane Path
  - O&M Building/Substation
  - Laydown Area
- Previously Documented Resource**
- Archaeological Site
  - Archaeological Site



**Figure 3 - D10**  
**Survey Results**  
**Addendum No.1**  
**Hog Creek Wind Project**  
**Hardin County, Ohio**







- Construction Easements**
- September 2016 Construction Easement
  - July 2016 Construction Easement
  - Areas Not Included in the July 2016 Construction Easement
  - Addendum No.1 Survey Corridor
  - Previously Surveyed (Holven et al. 2016)
- Proposed Project Facilities**
- Planned Turbine
  - Planned Collection Line
  - Planned Service Road
  - Planned Crane Path
  - O&M Building/Substation
  - Laydown Area
- Previously Documented Resource**
- Archaeological Site
  - Archaeological Site



Figure 3 - G4  
Survey Results  
Addendum No.1  
Hog Creek Wind Project  
Hardin County, Ohio

## **APPENDIX B – SHPO COMMUNICATIONS**

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December 29, 2016

Adam Holven  
Tetra Tech, Inc.  
2001 Killebrew Drive, Suite 141  
Bloomington, MN 55425

Re: Hog Creek Wind Farm, Combined Project  
16-1422-EL-BGA and 16-1423-EL-BGA  
Washington Township, Hardin County, Ohio

Dear Mr. Holven,

This is in response to correspondence from your office dated November 18, 2016 (received November 21) regarding the above referenced project. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with provisions of Ohio Revised Code 149.53 requesting cooperation among state agencies in the preservation of historic properties, Ohio Administrative Code 4906-17-08(D1-D3), and with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The two projects, Hog Creek I and Hog Creek II, involve construction of a wind farm generating facility integrating 30 wind turbines within an area spanning approximately 8,300 acres. Construction requires direct ground disturbance of 326 acres.

The correspondence transmits the archaeological report titled "Hog Creek Wind Farm Project, Hog Creek Wind Project LLC, Hardin County, Ohio, Phase I Archaeological Survey" by Adam Holven, November 2016. The reports documents an intensive survey following the survey design reviewed and approved by this office.

The 2016 archaeological survey resulted in the identification of three archaeological sites: 33-HR-308, 33-HR-309, and 33-HR-310. All three sites yielded assemblages predominately of historic-era artifacts. Tetra Tech recommends avoidance of these archaeological sites during construction and at least until the sites can be systematically evaluated for inclusion in the National Register. The SHPO agrees with this recommendation.

Previous archaeological survey based on the original plans for Hog Creek I and Hog Creek II resulted in the identification of 2 archaeological sites that produced substantial archaeological assemblages (33-HR-267 and 33-HR-279). We recommend that Tetra Tech include mapping in the archaeological survey report that includes archaeological sites to be avoided and in particular make sure that the areas for sites 33-HR-267 and 33-HR-279 are clearly identified in relationship to construction plans.

Mr. Adam Holven  
December 29, 2016  
Page 2

An Architecture-History survey was conducted for the Hog Creek I and Hog Creek II projects. The Combined Project will result in changes altering the settings for a number of buildings that are considered eligible for inclusion in the National Register. A Memorandum of Understanding was executed to provide mitigation for the cumulative effects of the wind farm construction. The SHPO has reviewed the MOU and we reaffirm that the successful completion of the stipulated treatment will provide appropriate mitigation and close the review for the Combined Project.

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,



David Snyder, Ph.D., Archaeology Reviews Manager  
Resource Protection and Review

DMS/ds (OHPOID: 2011-HAR-15738; Serial Number 1064618)

xc: Jon Pawley, Ohio Power Siting Board, 180 E. Broad, Columbus, OH 43215-3793





August 8, 2012

Joseph E. Almady, Project Director  
juwi Wind, LLC  
629 Euclid Avenue, Suite 635  
Cleveland, OH 44114

Re: Hog Creek Wind Farm  
09-277-EL-BGN  
Washington Township, Hardin County, Ohio

Dear Mr. Almady,

This is in response to correspondence from Andrew Sewell, Hardlines Design, dated July 10, 2012 (received July 13, 2012) transmitting the report titled "Phase I Archaeology Survey of the Hog Creek I & II Wind Farm, Washington Township, Hardin County, Ohio." The final report provides requested clarification concerning delineation of archaeological sites and consideration of eligibility. The final report also contains the archaeological site avoidance plan (Appendix C). The avoidance plan is attached to this correspondence. OHPO accepts both the final report and the archaeological site avoidance plan. The attached table lists identified archaeological sites and summarizes OHPO recommendations.

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

David Snyder, Ph.D., Archaeology Reviews Manager  
Resource Protection and Review

DMS/ds (OHPO Serial Number 1045095)

Attachment 1: Archaeological Site Avoidance Plan (Appendix C in the report)  
Attachment 2: List of Identified Archaeological Sites

xc (with attachments): Jon Pawley, Ohio Power Siting Board, 180 E. Broad, Columbus, OH 43215-3793  
(with attachments): Andrew Sewell, Hardlines Design Company, 4608 Indianola Avenue, Columbus, OH 43214

OHIO HISTORICAL SOCIETY

*Ohio Historic Preservation Office*

1982 Velma Avenue, Columbus, Ohio 43211-2497 ph: 614.298.2000 fx: 614.298.2037  
[www.ohiohistory.org](http://www.ohiohistory.org)



This document presents the archaeological site avoidance plan for the Hog Creek Wind Farm, Phases I and II, located in Hardin County, Ohio. Hardlines Design Company (HDC) performed archaeological surveys within the construction footprint of the wind farm that resulted in the discovery of archaeological sites, and there is a low to moderate risk of encountering previously undocumented sites during construction. The methods outlined here should be followed both before and during construction activities at the project location.

### **Site Avoidance Pre-Construction**

Early survey efforts have identified a number of archaeological sites at various locations within the project area. Often, the evidence gathered during the archaeological survey is sufficient to judge the significance of the site. In the case of surveys at Hog Creek, every site identified to date has had sufficient information to allow a recommendation of eligibility. In cases where a site is recommended as significant, or recommended for further work to determine the significance, the most prudent way to avoid an adverse impact on the site is to avoid the site. There are two sites within the boundaries of the Hog Creek Wind Farm that have been deemed significant and must be avoided. The following plan should be followed to ensure these two sites are not impacted by construction activities, regardless of their distance from any such activities. The archaeological consultant can be retained to perform the site marking and fencing, which would take a single work-day to accomplish.

*Site 33HR267:* This site is located to the southeast of Turbine 20 (Figure C1). A GIS shapefile has been supplied to Hog Creek Wind Farm, LLC, that marks a 150-foot buffer around the site boundary. This shapefile should be converted to CADD or the appropriate computer design program that will be used to create the engineering plans for the wind farm. On these plans, this buffer should appear and be labeled as “Environmentally Sensitive Area-Avoid.” Do not label this area as an archaeological site or cultural resource. The GIS shapefile is georeferenced, and can be loaded onto survey-grade GPS units such as a Trimble Geo XH. Using the appropriate GPS unit with this file, the 150-foot buffer should be marked in the field with orange snow fencing around the entire perimeter of the buffer. While construction is active, no entry or encroachment of the fenced area should be permitted. When construction is fully completed, the snow fencing should be removed by the local Hog Creek Wind Farm, LLC, representative.

*Site 33HR279:* This site is located to the north of Turbine 25 (Figure C2). A GIS shapefile has been supplied to Hog Creek Wind Farm, LLC, that marks a 150-foot buffer around the site boundary. This shapefile should be converted to CADD or the appropriate computer design program that will be used to create the engineering plans for the wind farm. On these plans, this buffer should appear and be labeled as “Environmentally Sensitive Area-Avoid.” Do not label this area as an archaeological site or cultural resource. The GIS shapefile is georeferenced, and can be loaded onto survey-grade GPS units such as a Trimble Geo XH. Using the appropriate GPS unit with this file, the 150-foot buffer should be marked in the field with orange snow fencing around the entire perimeter of the buffer. While construction is active, no entry or encroachment of the fenced area should be permitted. When construction is fully completed, the snow fencing should be removed by the local Hog Creek Wind Farm, LLC, representative.

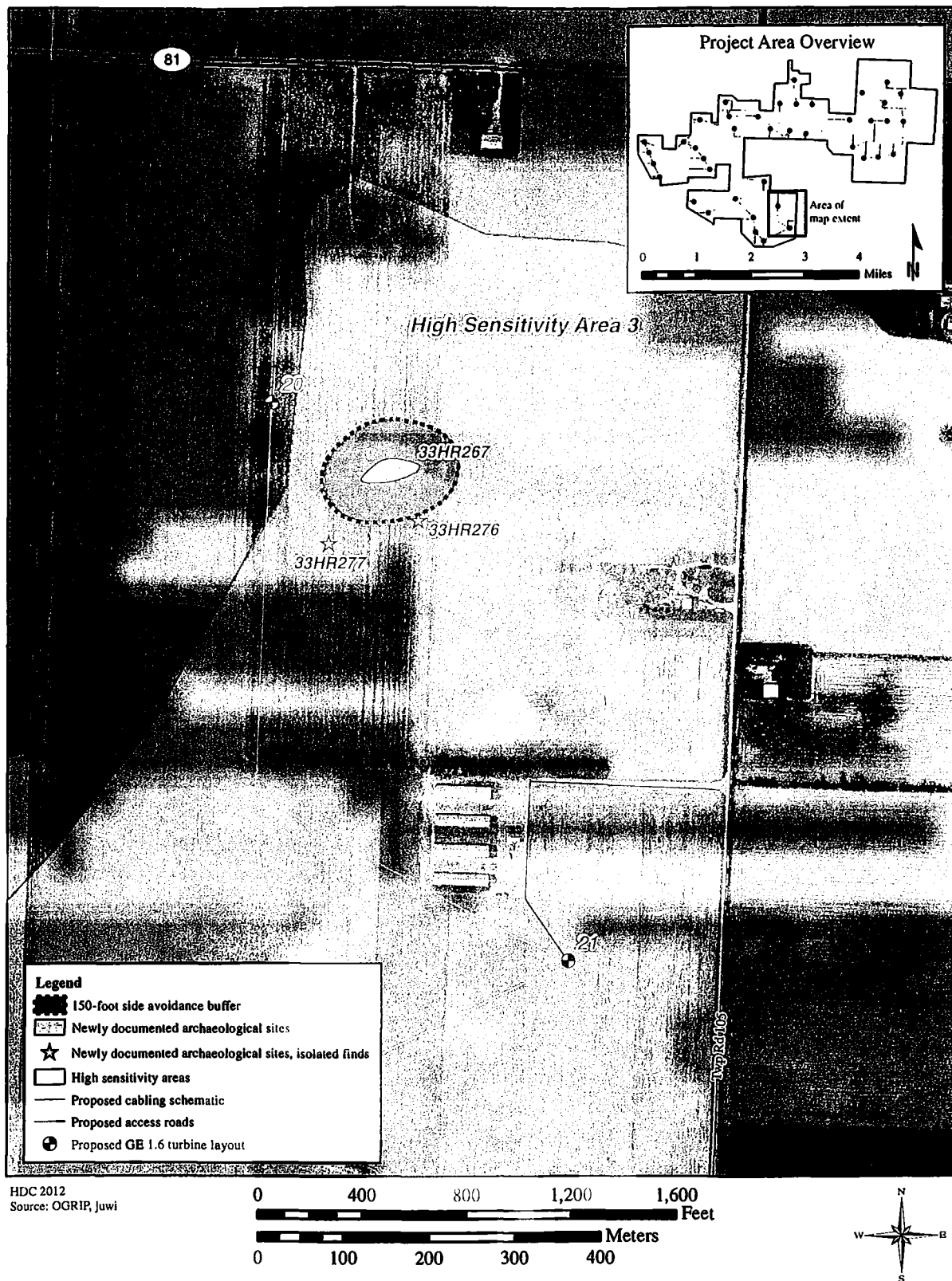


Figure C1. Avoidance buffer zone for site 33HR267 in relation to wind farm infrastructure



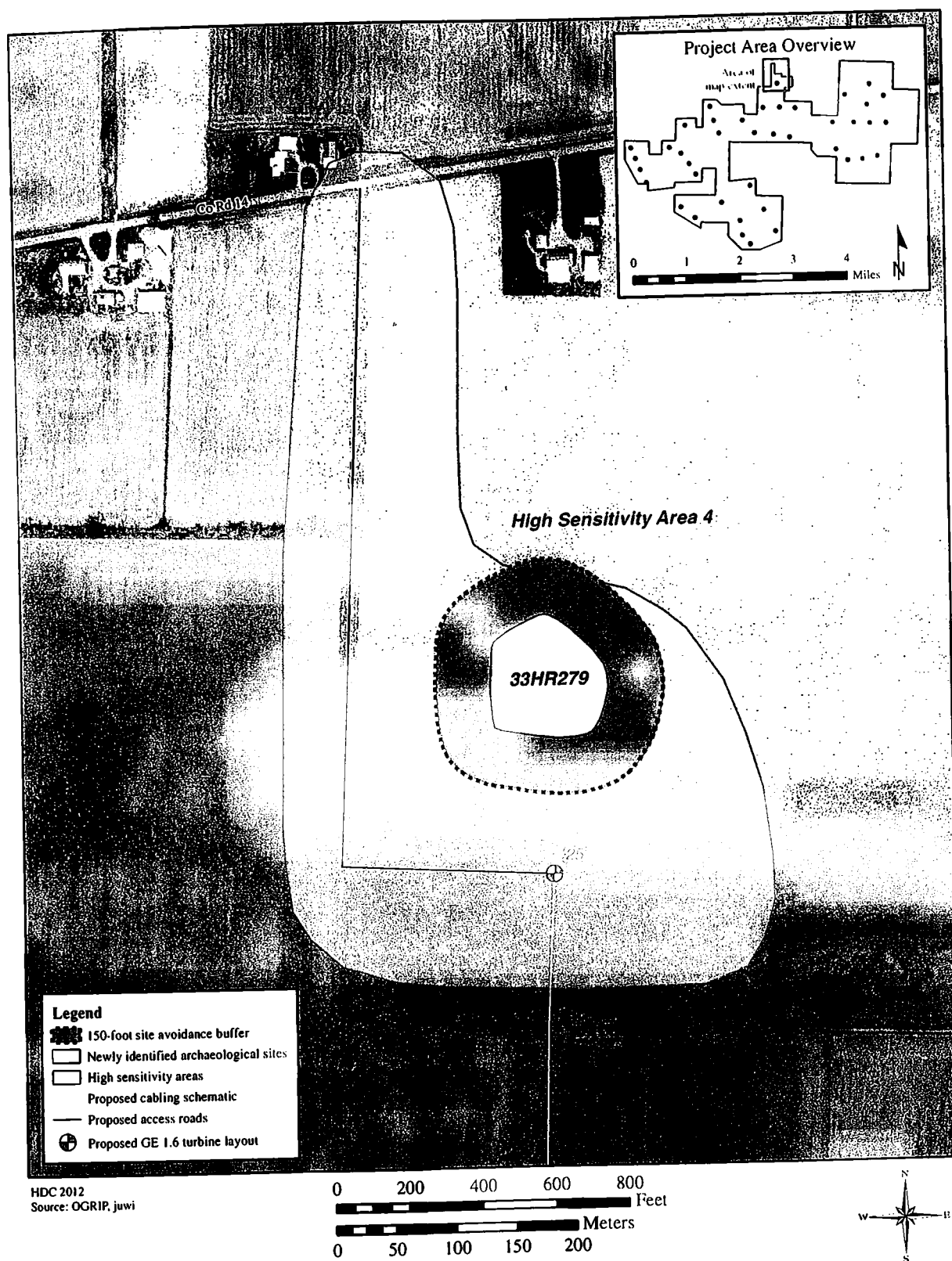


Figure C2. Avoidance buffer zone for site 33HR279 in relation to wind farm infrastructure

### **Unanticipated Site Discovery During Construction**

Due to the sampling method used to survey the Hog Creek wind farm, 90 percent of areas deemed as low probability for archaeological sites were not surveyed. While the probability is low for encountering a significant site during construction in these areas, it is still possible. Sites will likely be noticeable as concentrations of artifacts on the surface, although trenching may encounter buried artifacts. Historical sites are easy for non-archaeologists to identify, usually occurring as large clusters of broken dishes and bottles, brick fragments, and other debris. Low densities of historical artifacts, especially in the middle of active agricultural fields, are generally the result of historical agricultural activities and rarely represent significant site locations. Prehistoric sites may be easier to miss, but any finds of projectile points (commonly known as "arrowheads"), broken pieces of flint, and burnt rocks may indicate the presence of a prehistoric site.

If a previously unidentified archaeological site is discovered, follow this process:

If a site is discovered during construction, halt activities within 150 feet of the site until an archaeologist is able to assess the discovery. An archaeological consultant should be available on-call during construction.

The archaeologist will examine the site area, record the artifacts or features present, and submit a letter report of findings to OHPO for review and concurrence. The site should be fenced off with temporary fencing at a 150-foot distance from the site boundaries as determined in the field; construction within the site boundaries must halt until OHPO review is completed.

If project planning allows the construction plans to be modified to avoid the site, the following actions should be taken:

**Step 1:** Determine an alternative location for the construction footprint in relation to the site.

**Step 2:** Survey the alternate location to determine if the archaeological site extends into the alternate location, or if other archaeological sites are present within the location. A letter report must be submitted to OHPO to document the findings of this survey and to gain concurrence with any recommendations.

If no archaeological sites are present within the alternate location, then the part of the project that affects the original site should be shifted to the new location.

If new sites are found and are recommended as possibly significant, or the original site boundaries are determined to extend into the proposed alternate location, then the process should return to Step 1.

**Step 3:** If the construction footprint is relocated within 150 feet from the original site boundaries, stake and mark the original significant site with snow fencing during the construction phase of the project. Use GIS and GPS to determine the location of a 50-foot buffer zone around the site for staking. This fencing and staking should be removed

immediately after construction is finished. If the construction footprint is relocated more than 150 feet from the original site, then staking is not necessary.

**Step 4:** If the site cannot be avoided, excavate the site within the footprint to determine its significance, and if the site is determined to be eligible for the National Register of Historic Places, develop a data-recovery plan to address archaeological mitigation of the site. The data recovery plan must be submitted to OHPO for consultation and comments. After acceptance of the plan, the archaeological mitigation of the site must be completed before construction can continue within the site boundaries. This option is far more costly in terms of both budget and schedule, and avoiding the site should always be attempted first.

In all situations, a summary letter report must be submitted to OHPO that documents unanticipated discoveries and recommended courses of action.

### **Discovery of Human Remains**

In the unlikely event that human remains are encountered during construction activities, these items must be left in situ, and the OHPO and county coroner must be contacted immediately. All construction at and within a 150-foot buffer around the location of the human remains must cease immediately. HDC strongly urges a policy of leaving human remains in place and then altering the construction plans to avoid the location. Basic guidance for the treatment of human remains can be found in the Advisory Council on Historic Preservation 2007 *Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects* and the OHPO 1997 *Policy Statement on the Treatment of Human Remains*.

If the remains are determined by the coroner to be non-modern in origin, then a qualified archaeologist must be called in to assess the discovery. Since archaeological human remains are often accompanied by funerary objects, care must be taken to not disturb any items associated with or located close to the human remains. The discovery of human remains, funerary objects, or objects of cultural patrimony may result in a delay to the project, and a contract modification will be necessary. Excavation of human remains, if unavoidable, will require an excavation plan to be developed in consultation with OHPO, including treatment of remains and the ultimate disposition of the remains and associated objects.

August 8, 2012 - Attachment

Table: List of Identified Archaeological Sites

OAI Number	Affiliation	Eligibility	OHPO Recommendations	Comments
33-HR-247	Historic-era	No		
33-HR-248	Prehistoric	No		
33-HR-249	Historic-era	No		
33-HR-250	Historic-era	No		
33-HR-251	Historic-era	No		
33-HR-252	Prehistoric	No Effect		Site extends outside of ROW
33-HR-266	Historic-era	No Effect		Site extends outside of ROW
33-HR-267	Prehistoric	Undetermined	Will be avoided	
33-HR-268	Historic-era	No Effect		Site extends outside of ROW
33-HR-269	Prehistoric	No		
33-HR-270	Prehistoric	No		
33-HR-271	Prehistoric	No		
33-HR-272	Historic-era	No		
33-HR-273	Prehistoric	No		
33-HR-274	Prehistoric	No		
33-HR-275	Prehistoric	No		
33-HR-276	Prehistoric	No		
33-HR-277	Prehistoric	No		
33-HR-279	Prehistoric	Eligible	Will be avoided	

**MEMORANDUM OF UNDERSTANDING (MOU)**  
**BETWEEN HOG CREEK WIND FARM, LLC**  
**AND THE**  
**OHIO HISTORIC PRESERVATION OFFICE**  
**REGARDING HOG CREEK WIND FARMS (I & II)**  
**HARDIN COUNTY, OHIO**

**WHEREAS** Hog Creek Wind Farm, LLC (Hog Creek) plans to construct and to operate the Hog Creek Wind Farm Project in Hardin County, Ohio (the Project); and

**WHEREAS** the Project will be regulated by the Ohio Power Siting Board (OPSB) under Chapter 1552 of the Ohio Revised Code and Chapters 4906-1 to 7906-17 of the Ohio Administrative Code; and

**WHEREAS**, pursuant to Chapters 4906-17-08 (D) of the Ohio Administrative Code, Cultural Impacts, applicants for wind farm projects are directed to assess the impacts posed by their projects on the preservation and continued meaningfulness of historic landmarks, and to develop plans in consultation with the Ohio Historic Preservation Office (OHPO) to mitigate adverse impacts anticipated to historic landmarks; and

**WHEREAS**, pursuant to Chapter 4906-17-08 (d) of the Ohio Administrative Code, Cultural Impacts, Hog Creek shall identify historic landmarks within five miles of the Project; and

**WHEREAS**, historic landmarks are defined as places of importance recognized through the National Register Program or by the Ohio Historical Society (Historic Landmarks); and

**WHEREAS**, Hog Creek has consulted with OHPO and undertaken architectural and archeological resource surveys to indentify Historic Landmarks in accordance with approved work plans; and

**WHEREAS**, Hog Creek has committed to the avoidance of significant archaeological sites; and

**WHEREAS**, Hog Creek has submitted an approved Archaeological Avoidance Plan to OHPO and OPSB to assure that identified significant archaeological sites are not disturbed during construction activities; and

**WHEREAS**, the Project will introduce a new type of development to the area that differs in scale, use, and design from established patterns; and

**WHEREAS**, because visual impacts to Historic Landmarks are anticipated as a result of changes to historic settings, Hog Creek has consulted with the Hardin County Historical Museums, Inc. to identify potential measures to mitigate effects to Historic Landmarks related to the Project.

**NOW, THEREFORE,** Hog Creek and the OHPO agree to cooperate so that the Project is implemented in accordance with the following stipulations to mitigate adverse impacts anticipated to Historic Landmarks, and to address the preservation and continued meaningfulness of Historic Landmarks.

## **STIPLULATIONS**

Hog Creek shall ensure that the following measures are carried out:

### **I. HARDIN COUNTY HISTORICAL MUSEUMS, INC.**

#### **a. HVAC/Electrical/Maintenance of Sullivan-Johnson House**

Hog Creek will contribute financial support to the on-going efforts by the Hardin County Historical Museums, Inc. to maintain the Sullivan Johnson House at 223 N. Main Street, Kenton, Ohio.

- i. The Hardin County Historical Museums, Inc. will be responsible for allocating the contribution from Hog Creek to the replacement/repair of the HVAC System, Electrical System and maintenance of the aforementioned at the Sullivan-Johnson House.
- ii. Hog Creek will contribute a total amount not to exceed \$10,000 payable no later than sixty (60) days after Hog Creek commences construction of the Project.
- iii. The Hardin County Historical Museums, Inc. agrees to obtain all local site approvals and to assume responsibility of future maintenance of the Sullivan-Johnson House.

#### **b. Hardin County Historical Museums, Inc. Operating Costs**

Hog Creek will contribute financial support to the Hardin County Historical Museums, Inc. for the funding of operating expenses.

- i. The Hardin County Historical Museums, Inc. will be responsible for allocating the contribution from Hog Creek to the appropriate operating expenses.
- ii. Hog Creek will contribute a total amount not exceed \$10,000 payable no later than sixty (60) days after Hog Creek commences construction of the Project.
- iii. The Hardin County Historical Museums, Inc. agrees to utilize the funds for operating expenses.

## **II. DURATION**

This MOU will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, Hog Creek, OPSB, OHPO and the Hardin County Historical Museums, Inc. may consult to reconsider the terms of the MOU and amend it in accordance with Stipulation VI below.

## **III. POST -REVIEW DISCOVERIES**

If potential Historic Landmarks are discovered or unanticipated efforts on previously identified Historic Landmarks are found, Hog Creek shall notify OHPO within 48 hours of the discovery. Hog Creek immediately shall secure the jobsite and suspend work in the vicinity of the affected resource. Hog Creek will consult with OHPO to resolve adverse effects. Hog Creek shall assure that all construction contractors are made aware of the requirements of this stipulation. Construction shall not resume near the discovered

resource until the site has been assessed by an archaeological consultant and deemed as not significant. In case of significant findings, the site avoidance plan will be implemented to mitigate impacts to the affected resource.

#### IV. MONITORING AND REPORTING

Following the execution of the MOU until it expires or is terminated, Hog Creek shall provide OHPO with an annual summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputed and objections received in the Hog Creek's efforts to carry out the terms of this MOU.

#### V. DISPUTE RESOLUTION

The Ohio Historic Preservation Office (OHPO) and Hog Creek each <sup>will as of 8/1/12</sup> make a good faith effort to resolve any disputes between them. However, if they are unable to resolve a dispute and have reached an impasse, both parties commit to contact the Ohio Commission on Dispute Resolution and Conflict Management (Commission). Either party may initiate the contact with the Commission within 45 days of the impasse to engage in a mediation process sanctioned by, and under the auspices of, the Commission. Hog Creek agrees to pay the standard Commission fee if necessary.

#### VI. AMENDMENTS

This MOU may be amended with such an amendment is agreed to in writing by the signatories. The amendment will be effective on the date that the MOU has been signed by all signatories.

Execution of this MOU by Hog Creek and OHPO and implementation of its terms evidence that Hog Creek had developed acceptable plans to support the continued meaningfulness of important cultural resources and to mitigate adverse impacts anticipated to Historic Landmarks from the Project.

REST OF PAGE INTENTIONALLY LEFT BLANK

**SIGNATORIES:**

**Hog Creek Wind Farm, LLC**

By: 

Date: 7-16-12

Name: Eric Simons

Its: Manager

**Hardin County Historical Museums, Inc.**

By: 

Date: 7-19-2012

Name: Linda L. Jams

Its: Director

**Ohio Historic Preservation Office**

By: 

Date: 8-1-2012

Name: for Mark J. Epstein

Its: Department Head, Resource Protection and Review



## **APPENDIX C – PHOTOGRAPHS**

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**Photograph 1 (South): A view of a soybean and corn field with 50 – 75% visibility at the proposed location of Turbine 31. Photograph taken on 12/6/2016.**



**Photograph 2 (South): A view of a tilled soybean field with 75 – 100% visibility at the collection line north of the proposed location of Turbine 21. Photograph taken on 12/6/2016.**



**Photograph 3 (South): A view of a tilled field with 75-100% visibility at the turning radius at the intersection of County Road 95 and 14. Photograph taken on 12/6/2016.**



**Photograph 4 (South): A view of a tilled cornfield with 75 – 100% visibility at the proposed location of Turbine 30. Photograph taken on 12/6/2016.**

## **APPENDIX D – UNANTICIPATED DISCOVERIES PLAN**

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# UNANTICIPATED DISCOVERIES PLAN FOR CULTURAL RESOURCES AND HUMAN REMAINS

## HOG CREEK WIND PROJECT HARDIN COUNTY, OHIO



### Prepared for:



Hog Creek Wind Project, LLC  
330 2nd Ave. South, Suite 820  
Minneapolis, Minnesota 55401

### Prepared by:



Tetra Tech  
2001 Killebrew Drive, Suite 141  
Bloomington, Minnesota 55425  
(612) 643-2200

**January 2017**



## PLAN AND PROCEDURES ADDRESSING UNANTICIPATED DISCOVERIES OF CULTURAL RESOURCES AND HUMAN REMAINS

### I. INTRODUCTION

This document outlines the procedure Hog Creek Wind Project, LLC (Hog Creek) will follow to prepare for and address any unanticipated discoveries of cultural resources during construction of the Hog Creek Wind Project (the Project), including archaeological sites and possible human remains. It provides direction to Hog Creek construction personnel and their consultants as to the proper procedure to follow in the event that unanticipated discoveries are made. This plan complies with 1) Ohio's "State registry of archaeological landmarks, effects; procedures for excavations; prohibitions; penalties" code (Ohio Revised Code § 149.51); 2) the Archaeological Avoidance Plan for Sites 33HR267 and 33HR279 and the unanticipated discoveries plan attached to the Ohio State Historic Preservation Office (SHPO) August 8, 2012 response letter to the 2011-2012 archaeological surveys at the Hog Creek I and II Wind Farms; and 3) the Memorandum of Understanding (MOU) completed between Hog Creek, SHPO, and Hardin County Historical Museums, Inc. executed on August 1, 2012.

### II. TRAINING AND ORIENTATION

The Hog Creek Environmental Project Manager (PM) will provide training as part of the pre-construction on-site training program for foremen, company inspectors and construction supervisors. The Hog Creek Construction Manager (CM) will be responsible for advising construction-contractor personnel on the procedures to follow in the event that an unanticipated discovery is made. The CM will advise all operators of equipment involved in grading, stripping, or trenching activities to:

- A. Stop work immediately if they observe any indications of the presence of cultural materials (artifacts or other man-made features), animal bone, or possibly human bone.**
- B. Contact the Hog Creek Environmental PM as soon as possible if the CM is not available.**
- C. Comply with unanticipated discovery procedures.**
- D. Treat human remains with dignity and respect.**

### III. PROCEDURE WHEN CULTURAL MATERIALS ARE OBSERVED

Cultural materials include man-made objects (prehistoric pottery or chipped stone tools and waste flakes and historic period items (items that are approximately 50 years old or greater such as bottle glass, can dumps, old farm equipment, etc.) and features (e.g., walls constructed of natural materials such as cobbles, surfaces paved by cobbles, brick, or other material), or other remnants of cultural activity.



**A. Stop work in the immediate vicinity of the observed cultural materials**

1. Notify the CM of the discovery.
2. If the CM believes that an unanticipated discovery has been made:
  - a) CM directs all ground-disturbing activities to stop within a minimum of 150 feet of the discovery.
  - b) CM will protect and secure the evidence in place by delineating the find with flagging or fencing.
  - c) Project activities can continue outside of the delineated unanticipated find area.

**B. Minimize movement of vehicles and equipment in area immediately surrounding the discovery.**

**C. CM will immediately notify the Hog Creek Environmental PM and the following individuals.**

***Hog Creek Contacts:***

Sean Flannery – Environmental PM	Al Jensen – Environmental PM
Phone: (612) 455-8449	Phone: (303) 439-4230
Mobile: (651) 338-5986	Mobile: (512) 529-1166
Email: <a href="mailto:sean.flannery@res-group.com">sean.flannery@res-group.com</a>	Email: <a href="mailto:al.jensen@res-group.com">al.jensen@res-group.com</a>

**D. The Hog Creek Environmental PM will immediately notify the Tetra Tech Project Manager and Archaeologist indicated below.**

***Tetra Tech Project Manager/Archaeologist***

Adam Holven  
Tetra Tech, Inc.  
2001 Killebrew Drive, Suite 141  
Bloomington, Minnesota 55425  
Phone: (612) 643-2237  
Mobile: (507) 301-1943  
Email: [adam.holven@tetrattech.com](mailto:adam.holven@tetrattech.com)

**E. Within 1 to 2 days, the Project Archaeologist will examine the location of the discovery, accompanied by the CM, and notify the SHPO of the discovery.**

1. The Project Archaeologist will examine the site, record the artifacts and features present, and submit a letter report of findings to the SHPO within 10 business days for review and concurrence.
2. During the examination of the site, drafting of the letter report, and waiting for the SHPO review, the site should be fenced off at a 150-foot distance from the site boundaries as determined in the field, and no work should be conducted within the fenced area until the SHPO review is complete.
3. If the Project facilities can be relocated to avoid the site, the following actions should be taken:
  - a. **Step 1:** Determine an alternative location for the Project facilities and associated construction footprint in relation to the site.
  - b. **Step 2:** Survey the alternate Project facilities and associated construction footprint to determine if the archaeological site extends into this area, or to determine if other archaeological sites are present. A letter report must be submitted to the SHPO to

document the findings of this survey and to gain concurrence with any recommendations.

If no archaeological sites are present within the alternate Project facilities and associated construction footprint, then Project facilities should be shifted to the new location.

If the original site boundaries are determined to extend into the alternate Project facilities and associated construction footprint, or if a new site is found and recommended as possibly significant, then process should return to Step 1.

- c. **Step 3:** If the construction footprint is relocated within 150 feet from the site boundaries, stake and mark a 50-foot buffer zone around the site with snow fencing during the construction phase of the project. This fencing and staking should be removed immediately construction is finished. If the construction footprint is relocated more than 150 feet from the site, then staking is not necessary.
- d. **Step 4:** If the site cannot be avoided, excavated the site within the footprint to determine its significance, and if the site is determined to be eligible for the National Register of Historic Places, develop a data-recovery plan to address archaeological mitigation of the site. The data recovery plan must be submitted to SHPO for consultation and comments prior to being implemented. After acceptance of the plan, the archaeological mitigation of the site must be completed before construction can continue within the site boundaries. This option is far more costly in terms of both budget and schedule, and avoiding the site should always be attempted first.

In all situations, a summary letter report must be submitted to SHPO that documented unanticipated discoveries and recommended courses of action.

**F. Ohio SHPO Contact Information.**

David Snyder, Ph.D., Archaeology Review Manager  
Resource Protection and Review  
State Historic Preservation Office  
Ohio History Connection  
800 E. 17<sup>th</sup> Ave.  
Columbus, Ohio 43211  
Phone: (614) 298-2000  
Email: dsnyder@ohiohistory.org

#### **IV. PROCEDURE WHEN HUMAN REMAINS AND/OR POTENTIALLY HUMAN SKELETAL MATERIALS ARE OBSERVED**

Human remains are physical remains of a human body or bodies including, but not limited to, bones, teeth, hair, and preserved soft tissues (mummified or otherwise preserved) of an individual. Remains may be articulated or disarticulated bones or teeth. Disturbance of human remains, burial places and or burial offerings is a felony under the Ohio's "State registry of archaeological landmarks, effects; procedures for excavations; prohibitions; penalties" code (Ohio Revised Code § 149.51).

- A. Workers will treat all human remains with dignity and respect.**
- B. Immediately stop work in the vicinity of an unanticipated discovery involving potentially human remains.**
- C. Immediately notify the CM about the find.**
- D. The CM will stop all ground-disturbing activities within a minimum of 150 feet of the discovery.**
  - 1. Protect and secure the evidence of the discovery.
  - 2. Delineate the area with flagging or safety fencing.
  - 3. Minimize movement by vehicles and equipment in the immediate vicinity of the discovery.
  - 4. CM will immediately notify the Hog Creek Environmental PM who will, in turn, immediately notify the designated contacts (see Section III C and III D for contact information):
  - 5. Project Archaeologist will consult with Environmental PM and then notify the Hardin County Sheriff's Office (see Section IV H) and the SHPO of the discovery.
- E. Within 1 to 2 days of the discovery, the Project Archaeologist will examine the site to determine if the remains are likely human and have an archaeological association, and if that association is aboriginal or non-aboriginal.**
- F. If skeletal remains are determined to be non-human and there is no archaeological association or paleontological significance, the Project Archaeologist making the determination will immediately notify the SHPO of this determination and advise the CM and/or the Hog Creek Environmental PM, and construction may resume.**
  - 1. The Project archaeologist will submit a letter report including photographs of the discovery site to the Hog Creek within 10 business days.
- G. If the skeletal remains are non-human but are associated with an archaeological site, follow the steps described in Section III A through F.**

**H. Hardin County Sheriff Contact Information.**

Keith A. Everhart, Sheriff  
1025 S. Main Street  
Kenton, Ohio 43326  
Phone: (419) 673 1268

- I. If human remains are removed by the County Sheriff, State Forensic Examiner or SHPO, construction work will not recommence until permission is granted in writing by the SHPO and appropriate law enforcement agencies.**

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/6/2017 4:09:50 PM**

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**Case No(s). 10-0654-EL-BGN, 16-1422-EL-BGA, 16-1423-EL-BGA**

Summary: Correspondence of Hog Creek Wind Farm LLC in Compliance with Certificate Condition No. 15 - Addendum No 1: Archaeological Survey electronically filed by Teresa Orahod on behalf of Sally W. Bloomfield