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August 23, 2017

Ms. Barcy F. McNeal, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, OH 43215

**Re: Case No. 13-197-EL-BGN, Trishe Wind Ohio, LLC
Notification of Compliance with Condition 1 of the Supplement –
Cultural Resource Avoidance Plan**

Dear Ms. McNeal:

Trishe Wind Ohio, LLC (“Applicant”) is certified to construct a wind-powered electric generation facility in Paulding County, Ohio (“Project”), in accordance with the December 16, 2013 Opinion, Order, and Certificate (“Certificate”) issued by the Ohio Power Siting Board (“OPSB”). The Certificate is subject to the 40 conditions set forth in the December 16, 2013 Order, as well as the 26 conditions set forth in the October 1, 2013 Supplement to the original application (“Supplement”).

Condition 1 of the Supplement requires the Applicant to develop a cultural resource avoidance plan, in consultation with OPSB and the Ohio Historic Preservation Office. The plan must detail procedures for flagging and avoiding all potentially NRHP-eligible archeological sites in the Project area, and must contain measures to be taken should previously unidentified archeological deposits or artifacts be discovered during construction of the Project.

The Applicant is providing this letter to notify the OPSB that the Applicant has developed and completed the cultural resource avoidance plan, which is attached hereto. Accordingly, Condition 1 of the Supplement is satisfied.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ William V. Vorys

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Enclosure

Attorneys for Trishe Wind Ohio, LLC

Cultural Resources Avoidance Plan for Trishe Wind Ohio Wind Farm Construction

Construction of the Trishe Wind Ohio wind farm 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 CECNP application). This survey included 150-foot-wide corridors encompassing all of the turbine access roads and foundations that will be constructed for 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.

If previously unknown cultural resources are encountered during substation 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 substation design may be revised to avoid the site entirely. Any such revised substation footprint 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 substation design may still be revised to avoid the site entirely. Any such revised substation footprint 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 substation footprint 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 substation 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 significant archaeological site. The remains will be left in place, the site delineated and the substation footprint 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 substation would not recommence until the agreed upon mitigation has been accomplished and confirmed by OHPO to be satisfactory.

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Case No(s). 13-0197-EL-BGN

Summary: Notification of Compliance with Condition 1 of the Supplement--Cultural Resource Avoidance Plan electronically filed by Mr. William V Vorys on behalf of Trishe Wind Ohio, LLC