

From: [Ohio Power Siting Board](#)
To: [Puce Docketing](#)
Subject: comment 18-1334-EL-BGN [ref:_00D10GZxt_500t0GHfuk:ref]
Date: Tuesday, March 26, 2019 12:35:55 PM
Attachments: [image006.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image012.png](#)
[image014.png](#)
[image002.jpg.html](#)
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[image006.png.html](#)
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[image012.png.html](#)
[image014.png.html](#)
[image016.jpg.html](#)

March 25, 2019

RE: Prehistoric earthwork within the Highland Solar Farm's proposed project boundaries – needs to be preserved.

Case number: [18-1334-EL-BGN](#)

Project: Highland Solar Farm

Applicant: Hecate Energy Highland LLC

Location: Highland County

Dear Ohio Power Siting Board:

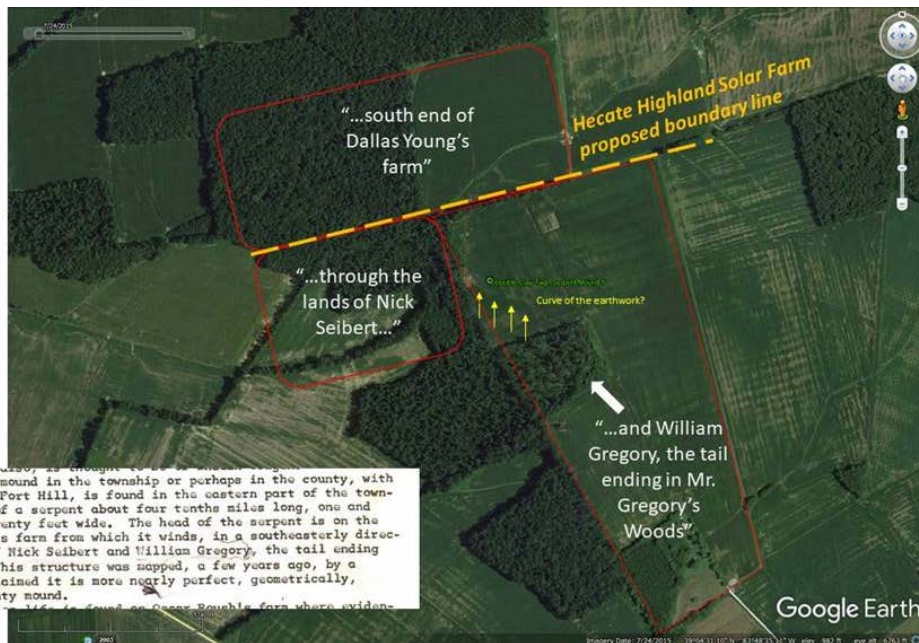
I recently provided sworn, public testimony regarding this project during the Local Public Meeting at White Oak High School on March 19, 2019. In my testimony I read a short section from the "History of Clay Township, Highland County, Ohio" by Alva W. Martin (1955) of which a copy is on file at the Highland County Public Library. This written history describes a "serpent mound" stretching across three properties, one of these properties is included in the Highland Solar Farm's proposed project boundaries on the southwest side. (See figure below. I was able to identify the three properties described in the historical text with the help of the Highland County Recorder's office and Map Office at the Highland County Courthouse, and I've included a screenshot of the relevant text from the 1955 History.)

Location of the Possible "Serpent Mound" in Clay Township, Highland County, Ohio

This possible earthwork may now stretch into the Hecate Highland Solar Farm's proposed boundaries.

Quote from "The History of Clay Township" (1955) by Alva W. Martin:

The best specimen of mound in the township or perhaps in the county, with the possible exception of Fort Hill, is found in the eastern part of the township. It is in the form of a serpent about four tenths miles long, one and one half feet high, and twenty feet wide. The head of the serpent is on the south end of Dallas Young's farm from which it winds, in a southeasterly direction, through the lands of Nick Seibert and William Gregory, the tail ending in Mr. Gregory's woods. This structure was mapped, a few years ago, by a government official who claimed it is more nearly perfect, geometrically, than the famous Adams County mound.



Since my public testimony last week, I have received from local Ben Mullenix an additional historical account, from "Highland Pioneer Sketches and Family Genealogies" by Elsie Johnson Ayres (1971) which describes this "serpent mound" with additional details. (Also on file at the Highland County Public Library. See figure below for a screenshot of the relevant text. Unfortunately, at this time, I haven't yet located the 1967 State Geologist report, or the archaeological report referenced in the text).

land. Another mound in the eastern area of the township, in the form of a small twisting serpent was mapped some years ago by the government. State geologists and archaeologists checked it again in 1967, but they were unable to determine for what purpose it was intended.

This past week I was also granted permission by one of the landowners, Ray Gorman (arranged through local Steve Sandlin), on whose property the mound crosses, to investigate if any remnants of this 'serpent mound' still exists. We were able to trace out a significant section of this mound, and I was able to photograph different aspects of it. *Whatever the earthwork is that is referenced in these historical texts, it still exists.* (See the selection of photos below. If the Board would like additional photos, I have many more of both ground and aerial photos which I can provide).

Photo 1: (Taken using *Theodolite Pro* to capture Lat/Lon, Elevation, Azimuth, etc...) – this photo shows a section of the 'serpent mound' where it enters the treeline. We put orange ground flags down to identify the width of the mound. The mound's length extends through woodlots at both the northern and southern ends of the 'serpent mound' – the northern end, which is where the historical accounts place the Head of the Serpent, is within the Solar Farm's proposed boundaries.



Photo 2: In the photo below, we have used orange ground flags to mark the edge of the 'serpent mound' which you can also see because of the ground discoloration. Here you can see one of the bends in the 'body' of the 'serpent' with local residents Michael Eastlake and Mike Smith standing on either side.



Photo 3: Pictured on the right in the photo below is Loren Zephier, Chief Golden Light Eagle, a member of the Nakota Ihunktowan Band of South Dakota and one of the seven Sundance Chiefs of the Yankton Nakota. Pictured in the center is Bear Wyman Wichapi Lutah, Lakota, From Wounded Knee S.D. Pine Ridge Reservation, and a Harvard Law graduate. They came out with me to view the 'Serpent Mound' in Clay Township and to conduct a ceremony there. I've drawn in the approximate outline of a portion of the 'serpent mound'.



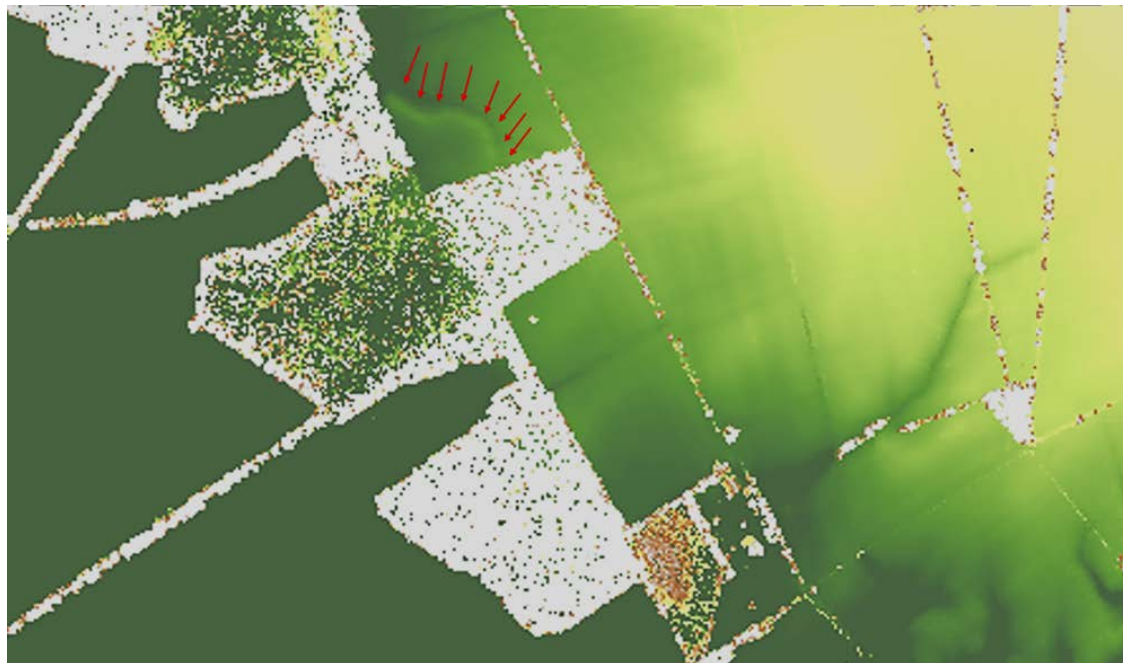
Photo 4: In the image below, from left to right is archaeologist and forensic anthropologist Erin Rose, from Pittsburg, PA, my wife Delsey Wilson, Executive Director of the Friends of Serpent Mound (a registered 501c3 non-profit) and Bear Wyman Wichapi Lutam, Lakota – standing on the 'serpent mound' and examining a handful of potential artifacts picked up alongside the 'serpent mound' in the field. The wooden walking stick in the background denotes the edge of the mound. The green line behind that is a trench installed by the farmer to drain water away from this area because it cannot get past the 'serpent mound' and its slightly higher elevation.



Photo 5: A drone aerial photo taken of the portion of the 'serpent mound' still visible in the field with dotted line outlining the mound's boundaries, and showing the installed drainage trench running along the length of the elevated mound area.



I have also included here a rough, partially-processed LiDAR image map (from the OHIO SPATIAL DATA INFRASTRUCTURE online database, and archaeologist Dr. William Romain) which clearly shows the undulating curves of the 'serpent mound' though the open field (highlighted by the red arrows):



Note that according to the 1955 and 1971 historical reports, the 'serpent mound' extended into the woods to the NW and SE of the section visible in the open field.

One local man, Flick Young, who lives just a couple of miles from the site, told me that when his cousin used to own the site several decades ago, he picked up this artifact (see photo below) from the boundary of the field, and other locals have additional artifacts from the site, or from the fields surrounding the site.



Taking into account the two historical reports identifying this earthwork as a 'serpent mound,' the LiDAR data showing the earthwork still exists, the ground-truth visits and photos showing the earthwork, there is little doubt that the remnants of this mound still exist.

I am strongly advocating for the preservation of the portion of this earthwork that stretches into the Highland Solar Farm's project boundaries (as well as the portions that exists outside the project's boundaries, although I'm aware that the Board has no control over the outside portions). If possible, that portion of land on which this mound remains should be set aside, and there should be made available public access to this site. It could serve as an additional source of tourist revenue for the local community should it be preserved. I would strongly urge the Board to direct Hecate Energy Highland LLC to direct their archaeological assessment in this area, as they (and their representative Terracon who they've hired to conduct this assessment) have not yet completed their archaeological assessment (as of last week) despite their stated expected completion date of December 2018.

I would stress that archaeological resources are non-renewable – once they are destroyed, they are not recoverable, and the information that can be gleaned from them about our heritage is lost. I would recommend that whatever archaeology team goes out to assess this site, they familiarize themselves with the wide range of the other serpent mounds that have been documented across North America. Serpent mounds come in a wide range of sizes, styles, and construction materials and methods. Last year I put together a presentation on "Serpent Effigies of North America" in which I mapped out 95 reported serpent effigies, with quite a number of additionally reported ones that I didn't have enough details to map their locations. If the Board is interested in further understand that aspect, I'd be happy to provide a copy of that presentation. Hopefully someone is sent that has some experience with looking at remnant earthworks. I don't think shovel testing is an appropriate method here (although that may turn up some kind of evidence). Best practice here would be to do a magnetometer survey, and I'd recommend the German company Sensys for the

job, as they have highest resolution magnetometer array, and have experience doing this kind of mapping for the National Park Service at Hopewell Culture National Historic Park's earthwork sites.

I want the Board to know that I am generally in favor of solar power, and for this project, however I want to make sure that due diligence has been done here, particularly regarding this ancient earthwork.

Thank you very much for your consideration of these important findings, and I hope that the information provided here helps to guide you in your decisions regarding this project.

Sincerely,

Jeffrey Wilson

President, Friends of Serpent Mound

Jeff.wilson@serpentmound.org

734-891-2689

CC: Ohio State Historic Preservation Office – Brent Eberhard, Dave Snyder



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To: [Puco Docketing](#)
Subject: comment 18-1334-EL-BGN [ref:_00Dt0GzXt._500t0GHgJq:ref]
Date: Tuesday, March 26, 2019 12:57:01 PM


Dear Ohio Power Siting Board OPSB,

Dear Members of the Ohio Power Siting Board

I am writing to you today in support of the 300 megawatt solar installation in Highland County. Ohio lags far behind the rest of the country in developing renewable energy, with less than 3% of our generation coming from clean energy. This is an opportunity to bring a large-scale solar project to southern Ohio! Investing in renewable energy brings jobs, mitigates climate change, and boosts our economy.

Please join me in supporting this project to build a healthier tomorrow. Protecting the air, water, and land of all who call Ohio home.

Thank you.

Sincerely,
Sue Klein
2039 N Medina Line Rd
Akron, OH 44333 

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This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 18-1334-EL-BGN

Summary: Public Comment (2) received via website electronically filed by Docketing Staff on behalf of Docketing.