



Vorys, Sater, Seymour and Pease LLP Legal Counsel 614.464.6400 | www.vorys.com

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Michael J. Settineri Direct Dial (614) 464-5462 Direct Fax (614) 719-5146 Email mjsettineri@vorys.com

October 8, 2019

## **VIA ELECTRONIC MAIL**

Ohio Power Siting Board Staff c/o Grant Zeto, Project Manager 180 East Broad Street, 6th Floor Columbus, OH 43215-3793

Re: Information Regarding Scioto Ridge POI Substation Fill Case No. 16-2032-EL-BLN

Dear Mr. Zeto.

This correspondence responds to the Ohio Power Siting Board Staff's request that Hardin Wind LLC provide it with additional information regarding the placement of additional fill at the site of the Scioto Ridge Point of Interconnect Substation. Construction of the facility commenced on December 4, 2018 and will continue through much of 2019.

The primary contractor for the substation is Newkirk Electric Associates (Newkirk) and it is responsible for the design of the substation, subject to AEP Transmission's requirements, and its construction. Ownership of the substation and property on which it is located will be transferred to AEP Transmission when its construction is completed. The design specifications of the substation, including its final grading configuration, are required to comply with AEP Transmission's design requirements. This led to a need to substantially raise its elevation in some locations to achieve a permissible surface cross-slope. These design requirements resulted in the need for Newkirk to bring in fill to the substation site as a balanced site could not be achieved otherwise given its relatively small footprint.

Under the terms of the contract executed for the substation's construction, Newkirk is responsible for all construction materials and fill required for the substation. Newkirk elected to procure the fill material to meet AEP Transmission's grading requirements from a landowner immediately to the west of the substation site. Hardin Wind LLC's understanding is that a separate contract allowing the fill to be taken from the adjoining parcel was entered into directly between Newkirk and the neighboring landowner. The result was the formation of a "borrow pit" that the landowner will convert and use as a recreational pond.

The parcel on which the borrow pit was formed is also subject to a lease with Hardin Wind LLC and will host facilities for the wind farm and associated transmission line



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(Case Nos. 13-1177-EL-BGN and 13-1768-EL-BTX). No facilities from the substation are located or will be located on the parcel, and the borrow pit is not a project component or task that is covered or addressed by a Hardin Wind lease.

You also requested information on the potential environmental impact of the borrow pit and pond formation. The borrow pit was created in an existing agricultural area that has been farmed for many years and no wetlands or other aquatic resources were present in that area. As to cultural and archaeological resources, part of this area was reviewed by Cultural Resource Analysts, Inc. (CRA) during architectural and archaeological surveys for the overall wind farm project and the POI substation.

Three resources listed in the Ohio Historic Inventory (OHI) were previously recorded within 1,000 feet of the original certificated POI Substation location on the property where the borrow pit was constructed. These OHI resources (HAR0055015, HAR0066010, and HAR0066110) are all located along CR 180. According to OHPO records, all three OHI resources are residences, constructed circa 1900 to 1920. These three resources were not impacted by the creation of the borrow pit. No National Register sites, previously recorded archaeological sites, or cemeteries were identified within the study area using the Ohio Historic Preservation Office databases. The findings of the POI Substation application may be considered representative of the impacts of the borrow pit creation and pond formation.

We hope the information in this correspondence is helpful. Please call me if you have any questions regarding this correspondence.

Very truly yours,

/s/ Michael J. Settineri

Michael J. Settineri Attorneys for Hardin Wind LLC

cc: Ohio Power Siting Board, Case Docketing

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Summary: Correspondence Regarding Information on Scioto Ridge POI Substation Fill electronically filed by Mr. Michael J. Settineri on behalf of Hardin Wind LLC