

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of **REPUBLIC** )  
**WIND, LLC** for a Certificate of )  
Environmental Compatibility and Public Need ) Case No. 17-2295-EL-BGN  
for a Wind-Powered Electric Generating )  
Facility in Republic and Sandusky Counties, )  
Ohio. )

**DIRECT TESTIMONY OF**

**SUSAN G. LAWSON**

**on behalf of**

**Republic Wind, LLC**

**October 21, 2019**

1    **I.        INTRODUCTION AND PURPOSE OF TESTIMONY**

2    **Q-1.    Please state your name, current title, and business address.**

3    **A-1.**    My name is Susan G. Lawson. My business address is 41 State Street, Suite 401, Albany,  
4        NY 12207.

5    **Q-2.    What is your educational background?**

6    **A-2.**    I received a Bachelor of Science degree in Architecture from the University of Virginia in  
7        1999. I received a Master of Arts degree in Historic Preservation Planning from Cornell  
8        University in 2003.

9    **Q-3.    What is your professional background?**

10   **A-3.**    I am currently employed as the Historic Preservation Project Manager at Environmental  
11        Design & Research, Landscape Architecture, Engineering, & Environmental Services,  
12        D.P.C. (“EDR”). I have held this position since 2018. From 2015 to 2018, I served as a  
13        Senior Cultural Resources Specialist at EDR. Since 2016, I have also served as an  
14        Architectural Educator at ArchiTykes.

15        From 2013 until joining EDR in 2015, I was employed at Johnson-Schmidt, Architect, PC,  
16        as a Preservation Architect and Architectural Historian. From 2005 to 2013, I was  
17        employed at Argus Architecture & Preservation, first as an Intern Architect and  
18        Architectural Historian and then as a Preservation Architect and Architectural Historian.  
19        Prior to that, while I was in graduate school and after I graduated in 1999, I worked as an  
20        Intern Architect for a number of firms in New York and Pennsylvania.

21        I have been a Licensed Architect and an LEED accredited professional since 2008. I meet  
22        the Secretary of Interior’s Standards for Historic Preservation Projects, as set forth in 36  
23        C.F.R. Part 61. I am also the trustee of the Historical Society of the Town of Colonie, NY  
24        and a member of the U.S. Green Building Council.

25   **Q-4.    On whose behalf are you offering testimony?**

26   **A-4.**    I am testifying on behalf of the Applicant in the case, Republic Wind, LLC (“Applicant”  
27        or “Republic Wind”).

1 **Q-5. What is the purpose of your testimony?**

2 **A-5.** The purpose of my testimony is to provide additional context, support, and clarification  
3 regarding the information set forth in the Cultural Resources Report, filed as Exhibit S to  
4 the Amended Application for a Certificate of Environmental Compatibility and Public  
5 Need, filed by Republic Wind in case 17-2295-EL-BGN (the “Amended Application”) on  
6 December 26, 2018.

7 **Q-6. What is the nature of your involvement with this proceeding?**

8 **A-6.** In this proceeding, Republic Wind is seeking approval from the Ohio Power Siting Board  
9 (“OPSB”) for a certificate for the construction of the Republic Wind in Sandusky and  
10 Seneca Counties (the “Project”). The Project will involve approximately 24,000 acres of  
11 private lands in Adams, Pleasant, Reed, Scipio, and Thompson Townships in Seneca  
12 County; and York Township in Sandusky County (the “Project Area”). A map depicting  
13 the Project Area is included at Figures 2 to Exhibit S to the Amended Application. As part  
14 of its application process before the OPSB, Republic Wind retained EDR to conduct a  
15 cultural resources records review and prepare a Cultural Resources Report. This Report  
16 was completed by EDR in January 2018 and filed by Republic Wind as part of its initial  
17 Application in the OPSB proceeding, and was then updated in December 2018 and filed as  
18 part of the Amended Application. I am one of the authors of Report.

19 **II. THE REQUIREMENTS AND METHODOLOGY OF THE CULTURAL**  
20 **RESOURCES REPORT**

21 **Q-7. What is the Cultural Resources Report?**

22 **A-7.** The Ohio Administrative Code Chapter 4906-04-08(D)(1) and (2) and the OPSB require  
23 that applicants such as Republic Wind evaluate all cultural resources located within 5-miles  
24 of the proposed Project Area, an area known as “the Study Area.” A map depicting the  
25 Study Area is included at Figure 2 to the Amended Application. The Cultural Resources  
26 Report is intended to comply with these requirements and includes a review of the existing  
27 cultural resource records available for the Study Area, including those available from the  
28 Ohio State Historic Preservation Office and other resources.

1 **Q-8. What methodology did EDR use in completing the Cultural Resources Report?**

2 **A-8.** EDR reviewed existing cultural resource records in order to identify any known or  
3 suspected cultural resources within the Survey Area. This methodology is set forth at  
4 Section 2.1 and 2.2 of Exhibit S to the Amended Application. Specifically, the review  
5 encompassed the following records available at the Ohio State Historic Preservation  
6 Office: Ohio Historic Preservation Office previous Phase I, II, and III cultural resource  
7 surveys; National Register of Historic Places; National Register of Historic Places  
8 Determination of Eligibility properties; National Historic Landmarks List; Ohio Historic  
9 Inventory; Ohio Department of Transportation; Historic Bridge Inventory; Ohio  
10 Archaeological Inventory; Ohio Genealogical Society cemetery files; Mills *Archeological*  
11 *Atlas of Ohio* (1914). The review also included archives and repositories, such as the  
12 Geographic Information Systems mapping system of the Ohio Historic Preservation  
13 Office, the David Rumsey map collection, Ancestry.com and other online sources, and  
14 EDR's in-house collections.

15 As is typical, customary, and appropriate for this stage of the OPSB certification process,  
16 EDR's preparation of the Cultural Resources Report was limited to the review of existing  
17 cultural resource records, and was thus prepared without the use of field surveyors.  
18 Accordingly, the Cultural Resources Report does not discuss or expresses any opinion  
19 regarding the potential presence of or impact to currently unknown cultural resources.

20 **III. RESULTS OF CULTURAL RESOURCE RECORDS REVIEW**

21 **Q-9. What known cultural resources were identified within the Study Area?**

22 **A-9.** The Cultural Resource Report summarizes cultural records reviews intended to identify the  
23 presence or suspected presence of numerous categories of cultural resources, from historic  
24 above-ground buildings to archaeological sites of suspected Native American habitation.  
25 The results of this review are set forth in Exhibit S to the Amended Application, specifically  
26 at Section 2.2.1 to 2.2.10 and the corresponding Figure 3 and Appendices A through E.

27 While known cultural resources were identified within the Study Area and the Project Area,  
28 as detailed in Exhibit S to the Amended Application, the Project is not expected to directly  
29 impact those known cultural resources.

1 **Q-10. In determining the expected impact of the Project, what assumptions did you make**  
2 **regarding the physical impact of the Project within the Project Area?**

3 **A-10.** The Project Area will involve approximately 24,000 acres of private lands in Adams,  
4 Pleasant, Reed, Scipio, and Thompson Townships in Seneca County; and York Township  
5 in Sandusky County. Within that Project Area, the facilities are expected to consist of up  
6 to 50 wind turbine generators, up to 20 miles of access roads, and up to 83 miles of buried  
7 34.5kV electric collection cable, a collection substation, a temporary laydown yard for  
8 construction staging, an O&M building, and up to three permanent meteorological towers.

9 **Q-11. What direct impact, if any, will the Project have on known cultural resources?**

10 **A-11.** No direct impacts to known cultural resources were identified. As a result, no specific  
11 mitigation measures are proposed.

12 **Q-12. What direct impact, if any, will the Project have on known cultural resources?**

13 **A-12.** The Project has the potential to cause limited, indirect visual impact to known above-  
14 ground cultural resources identified in the Study Area. The topic of visual impact is the  
15 subject of the direct testimony of Matthew Robinson, and therefore neither EDR nor I  
16 express any opinion about what mitigation measures, if any, may be appropriate.

17 **Q-13. Does this conclude your testimony?**

18 **A-13.** Yes, it does, except that I reserve the right to update this testimony to respond to any further  
19 testimony in this case.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Direct Testimony of Susan G. Lawson was served upon the following parties of record via regular or electronic mail this 21<sup>st</sup> day of October 2019.



---

Devin D. Parram

cendsley@ofbf.org

lcurtis@ofbf.org

amilam@ofbf.org

jclark@senecapros.org

jvankley@vankleywalker.com

cwalker@vankleywalker.com

mulligan\_mark@co.sandusky.oh.us

mleppla@theoec.org

tdougherty@theoec.org

ctavenor@theoec.org

jodi.bair@ohioattorneygeneral.gov

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

**Commission of Ohio Docketing Information System on**

**10/21/2019 5:04:30 PM**

**in**

**Case No(s). 17-2295-EL-BGN**

Summary: Testimony of Susan G. Lawson on behalf of Republic Wind, LLC electronically filed by Teresa Orahod on behalf of Devin D. Parram