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March 16, 2020

Ms. Tanowa Troupe, Secretary  
Ohio Power Siting Board  
Docketing Division  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, OH 43215

**Re: Case Nos. 17-773-EL-BGN and 18-1360-EL-BGN**

In the Matter of the Applications of Hardin Solar Energy LLC/Hardin Solar Energy II LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Hardin County, Ohio.

**Compliance with Condition 13, Case Nos. 17-773-EL-BGN and 18-1360-EL-BGN, SHPO Comments on Archaeological Resources Survey, the Cultural Resources Investigation, and the Architecture Historic Survey**

Dear Ms. Troupe:

Hardin Solar Energy LLC/Hardin Solar Energy II LLC (“Applicant”) is certified to construct a solar-powered electric generation facility in Hardin County, Ohio, in accordance with the orders issued by the Ohio Power Siting Board (“OPSB”) in the above-referenced cases. By Entry issued May 16, 2019, the OPSB approved the merger of the certificates issued to Hardin Solar Energy LLC and Hardin Solar Energy II LLC, for a combined generating capacity of 320 megawatts (“MW”). The Applicant is currently preparing to begin construction on the initial phase of Phase 2 of the 320-MW project.

At this time, the Applicant is filing three additional letters (attached hereto) from the State Historic Preservation Office regarding the Archaeological Resources Survey, the Cultural Resources Investigation, and the Architecture Historic Survey—for purposes of compliance with Condition 13 of the OPSB’s February 15, 2018 Order in Case No. 17-773-EL-BGN and May 16, 2019 Order in Case No. 18-1360-EL-BGN.

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

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

William V. Vorys (0093479)

Dickinson Wright PLLC

150 East Gay Street, Suite 2400

Columbus, Ohio 43215

***Attorneys for Hardin Solar Energy LLC***

***/Hardin Solar Energy II LLC***

cc: Jim O’Dell  
4845-2110-9943 v1 [39579-24]



May 29, 2019

In reply, please refer to:  
2017-HAR-39429

Gabe Klooster  
Invenergy/Hardin Solar Energy LLC  
One South Wacker Drive, Suite 1800  
Chicago, IL 60606

Dear Mr. Klooster

RE: Hardin Solar Energy Project- "Architecture History Survey" Report  
Hardin County, Ohio

This letter is in response to the submission of the "Architecture History Survey" Report prepared by TRC Environmental Corporation, received on April 26, 2019. Our comments are made pursuant to Ohio Revised Code 149.53 and the Ohio Power Siting Board rules. We also offer comments in anticipation of submissions under Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

The "Architecture History Survey" presents the results of research into previously surveyed properties within two miles of the proposed project site, as required under OPSB rules. The methodology for the survey was previously the subject of consultation with this office and the current report fits within the framework that was presented. Of the previously known inventoried properties, four of them were within view of the proposed project site. An additional three properties were surveyed and evaluated that are also within view of the proposed project site.

We concur with the eligibility recommendations made by TRC in the survey report and agree that the properties surveyed as HAR0067209, HAR0067009, HAR0067309, HAR0057705, HAR0072009, HAR0072109 & HAR0072205 are not eligible for inclusion in the National Register of Historic Places. Unless the scope or location of the proposed project changes, no further consultation is requested regarding potential effects on built resources that might be related to this project.

If you have any questions about this letter or our review of this project, please call me at (614) 298-2000 or email me at [ladkins@ohiohistory.org](mailto:ladkins@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Adkins".

Lisa Adkins, Architecture Reviews Mgr.  
Resource Protection and Review

David Price [dprice@trcsolutions.com](mailto:dprice@trcsolutions.com)

RPR Serno: 1078952



In reply, refer to  
2017-HAR-39429

April 29, 2019

Gabe Klooster  
Invenergy/Hardin Solar Energy LLC  
One South Wacker Drive, Suite 1800  
Chicago, IL 60606  
[gklooster@invenergyllc.com](mailto:gklooster@invenergyllc.com)

**RE: Hardin Solar Energy Center Project, Marion, McDonald, and Roundhead Townships,  
Hardin County, Ohio**

Dear Mr. Klooster:

This letter is in response to the correspondence received on April 3, 2019 regarding the proposed Hardin Solar Energy Center Project, Marion, McDonald, and Roundhead Townships, Hardin County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-4). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Cultural Resource Investigation of the Hardin Solar Energy Center Project - Hardin County, Ohio* by TRC Environmental, Inc. (2019).

Archaeological investigations took place within the 485.5 hectares (1,200-acre) project area in May and June 2018. No previously identified archaeological sites were located within the project area. Sixteen (16) new archaeological sites were identified during survey: Ohio Archaeological Inventory (OAI) sites 33HR0380-33HR0395. OAI#33HR0380-381, 33HR0383-386, and 33HR0389-392 are historic scatters. OAI#33HR0387, and 33HR0393-395 are prehistoric lithic scatters. OAI#33HR0382 and 33HR0388 are prehistoric isolated finds. It is TRC Environmental, Inc. recommendation that none of the sites are eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation and no additional archaeological investigations are needed

Our office received the history/architecture survey for the Hardin Solar Energy Center Project on April 26, 2019. Review of this report is in progress and we will issue our coordination letter regarding this survey within 30 days. I can be contacted at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

cc: James Greene, TRC ([jgreene@trcsolutions.com](mailto:jgreene@trcsolutions.com))  
Christine Pirik, Dickinson Wright PLLC ([cpirik@dickinsonwright.com](mailto:cpirik@dickinsonwright.com))  
Terrene O'Donnell, Dickinson Wright PLLC ([todonnell@dickinsonwright.com](mailto:todonnell@dickinsonwright.com))  
William Vorys, Dickinson Wright PLLC ([wvorys@dickinsonwright.com](mailto:wvorys@dickinsonwright.com))

RPR Serial No: 1078622





In reply refer to  
2017-HAR-39429

November 6, 2017

Gabriel Klooster  
Senior Analyst, Renewable Development  
One South Wacker Drive, Suite 1800  
Chicago, IL 60606

Re: Hardin Solar Energy 17-0773-EL-BGN  
Marion Township, Hardin County, Ohio

Dear Mr. Klooster,

This is in response to correspondence from your office dated September 26, 2017 (received September 26), regarding this 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 4906-4, and with provisions of the National Historic Preservation Act of 1966, as amended, and regulations at [36 CFR 800]).

The project proposes construction and operation of a solar farm electrical generation facility on approximately 1,100 acres in Marion Township, Hardin County, Ohio. The September 26, 2017 correspondence transmits work plans for the archaeological and architecture-history surveys for the Hardin Solar project.

For the archaeological survey:

- We do not recommend the completion of a predictive model (see Page 4) because in our opinion there is not a sufficient number of identified sites in this area to provide distinctions between high, medium, and low probability area.
- We recommend explicit use of environmental setting factors (see Page 9) in selecting targeted parcels for an intensive Phase I archaeological survey.
- Generally the term Controlled Surface Collection is used in connection with intensive work at a site with collection of all artifacts observed in small (e.g., 5 m x 5 m) collection blocks. The term Surface Collection is used to describe archaeological field work activities that include the systematic collection of artifacts during a pedestrian walk-over at relative close intervals in relatively level fields where there is very good or better visibility of the ground surface.
- We recommend the inclusion in the Phase I survey of the substation and work spaces given the extent of ground disturbance that will take place in these areas during project construction.
- We recommend that the Phase I archaeological survey include a sampling of places where older maps show historic-era farmsteads.
- We recommend that the work plan include provisions for the addition of an intensive Phase I survey of any areas that are added to the APE.

Mr. Gabriel Klooster  
November 6, 2017- Hardin Solar Energy  
Page 2

We agree with the proposed methodology for the architecture-history survey, limiting survey, analysis and inventory to those architecture-history resources within the project's viewshed. All such properties will be documented in the survey and inventory, regardless of their eligibility. For any area where the support structures exceed the height of the panels and racks, we request an intensive analysis of increased APE with more effort on survey.

For the architecture-history survey:

- We recommend inclusion of photographs with basic locational information for all locations within the approximately 1,340 acre project area that have been previously included in SHPO inventories regardless of your assessment on whether or not the property is in the viewshed of the project (see Page 8).

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

Sincerely,



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

DMS/ds

xc (by email only):

Christine M.T. Pirik ([cpirik@dickinsonwright.com](mailto:cpirik@dickinsonwright.com))

Jonathan Pawley, Ohio Power Siting Board

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

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**in**

**Case No(s). 17-0773-EL-BGN, 18-1360-EL-BGN**

Summary: Notice of Compliance with Condition 13, SHPO Comments on Archaeological Resources Survey, the Cultural Resources Investigation, and the Architecture Historic Survey electronically filed by Christine M.T. Pirik on behalf of Hardin Solar Energy II LLC and HARDIN SOLAR ENERGY LLC