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September 9, 2019

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th 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,
Archaeological Resources Survey Letter**

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 150 MWs of the 320-MW project.

At this time, the Applicant is filing the attached letter from the State Historic Preservation Office regarding the Archaeological Resources Survey in 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)
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***Attorneys for Hardin Solar Energy LLC
/Hardin Solar Energy II LLC***

cc: Jim O'Dell

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In reply, refer to
2018-HAR-43182

September 4, 2019

Gabe Klooster
Invenergy/Hardin Solar Energy LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
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 August 21, 2019 regarding the proposed Hardin Solar Energy Center Project, Marion, McDonald, and Roundhead Townships, Hardin County, Ohio. It is our understanding that the Hardin Solar II Energy Center Project Ohio Power Siting Board (OPSB) certificate was combined with the Hardin Solar Energy Center Project certificate. 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 Archaeological Survey, Hardin Solar Energy Center Project, Hardin County, Ohio* by TRC Companies (2019).

Archaeological investigations took place within the 3,700-acre project area (1,200-acres were previously investigated in 2018) in May through July 2019. One (1) previously identified archaeological resource was identified within the project area; Ohio Archaeological Inventory (OAI) #33HR205. OAI#33HR205 is a multicomponent site with a large prehistoric locale. The prehistoric component of OAI#33HR205 is recommended for avoidance or further investigation. Our office agrees with this recommendation. Another OAI is also located within the project area but was not addressed in the Phase I report. OAI#33HR0225 is a prehistoric isolated find. Our office does not recommend this site eligible for listing in the National Register of Historic Places (NRHP) and no additional investigation is needed for this site.

Forty (40) new archaeological sites were identified during this survey: OAI#33HR0422-33HR0461. Three (3) additional "isolated find" sites were also noted in the reporting (these sites are discussed in more detail below). TRC Companies, Inc. recommended the following sites for avoidance or further investigations: 33HR0424, 33HR0426-33HR0431, 33HR0446 (prehistoric component only), 33HR0454 (prehistoric component only), 33HR0455-33HR0456, 33HR0458, and 33HR0461. Of these recommendations, our office only recommends avoidance or additional investigations for the following sites: 33HR0424, 33HR0446 (prehistoric component only), 33HR0458, and 33HR0461. Our office also recommends additional historic research (and avoidance or additional investigations, if necessary) on the following historic sites: 33HR0459-33HR0460.

Our office requires a number of revisions to the Phase I Archaeological Survey, as detailed in the e-mail submitted to you on August 30, 2019. Along with some revisions and additional research needed in the report, we also recommended the three (3) "isolated find" sites to be identified and recorded as

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Mr. Klooster
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OAI sites and completion of all OAI forms are needed. Our office looks forward to the receipt of the revised Phase I Archaeological Survey report and OAI forms for our review.

In efforts to allow Invenergy/Hardin Solar Energy LLC and TRC Companies, Inc. to move forward with any additional investigations needed for the potentially eligible archaeological sites, we are issuing this coordination letter so parties involved may proceed with those investigations. In summary, our office recommends additional investigation and/or additional historic research on OAI#33HR0424, 33HR446 (prehistoric component only), and 33HR0458-33HR0461.

Our office looks forward to additional coordination regarding archaeological resources for the Hardin Solar Energy Center Project. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorricks@ohiohistory.org. Thank you for your cooperation.

Sincerely,



Krista Horrocks, Project Reviews Manager
Resource Protection and Review

cc: Curtis Biondich, TRC Companies (CBiondich@trccompanies.com)

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OHIO HISTORY CONNECTION

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Summary: Notice of Compliance with Condition 13, Case Nos. 17-773-EL-BGN and 18-1360-EL-BGN,
Archaeological Resources Survey Letter electronically filed by Christine M.T. Pirik on behalf of
HARDIN SOLAR ENERGY LLC and Hardin Solar Energy II LLC