

HILLCREST SOLAR PROJECT

November 14, 2019

Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793
Attn: Grant Zeto

RE: **Case Nos. 17-1152-EL-BGN and 18-1267-EL-BGA
Hillcrest Solar I, LLC**

Notice of Compliance with Certificate Condition #14 – Prior to the commencement of construction, Hillcrest shall conclude an architectural survey of the project area; Hillcrest shall also submit to Staff a work program that outlines areas to be studied, with the focus on structures that are located near the project area. If the study discloses a find of cultural or archeological significance, or a structure that could be eligible for inclusion on the National Register of Historic Places, then Hillcrest shall submit a modification or mitigation plan for Staff's acceptance. Any such mitigation efforts shall be developed in coordination with the OHPO and submitted to Staff for review and acceptance.

Dear Mr. Zeto;

Hillcrest Solar I, LLC ("Hillcrest Solar") is certified to construct a solar-powered electric generation facility in Brown County, Ohio in accordance with the orders issued by the Ohio Power Siting Board ("OPSB") in the above-referenced cases.

Attached please find a copy of the communications from the Ohio State Historic Preservation Office (SHPO) detailing their review, comment and acceptance of the Reconnaissance-Level Historic Resources Survey Report and the additional Memorandum regarding compliance with Certificate Condition #14 of the Opinion, Order and Certificate issued on February 15, 2018 in Case No. 17-1152-EL-BGN.

Innergex Renewable Energy Inc.

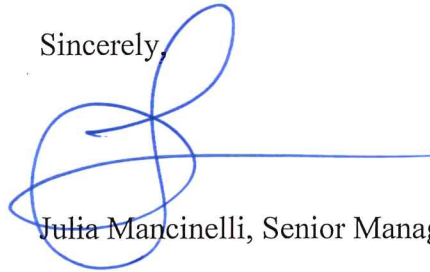
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HILLCREST SOLAR PROJECT

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

Sincerely,



Julia Mancinelli, Senior Manager - Environment

Attachment: SHPO Letter RE: Hillcrest Solar Project, Green Twp., Brown County, OH
OPSB Case No. 17-1152-EL-BGN/ EDR Project No. 19305 dated October
28, 2019

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October 28, 2019

In reply, please refer to:
2017-BRO-39360

Susan Lawson
EDT
217 Montgomery Street, Suite 1000
Syracuse, NY 13202

Dear Ms. Lawson:

RE: Hillcrest Solar Project, Green Twp., Brown County, OH
OPSB Case No. 17-1152-EL-BGN/ EDR Project No. 19035

This letter is intended to formalize comments made during a conference call with representatives from EDR on October 22, 2019 and in subsequent emails from this office. 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 4906-17-08(D1-D3), and in accordance with implementing regulations of the National Historic Preservation Act of 1966, at 36 CFR 800.

The Scope of Work for the historic architecture field survey for this project was customized to maximize the level of effort in proximity to parcels proposed for use as part of the Hillcrest Solar Project. Your report also took into account previously identified resources located in the Village of Mt. Orab. We accept the survey report, along with the additional Memorandum, photolog and Visual Resources Assessment (submitted September 12, 2019) as generally meeting the Scope of Work that was established for the project.

We agree with the positive eligibility recommendations for the five newly identified properties-BRO0063903, BRO0064003, BRO0064103, HIG0045413 and BRO0064203 should be considered as eligible for the National Register of Historic Places (NRHP).

One previously surveyed property was relocated and its Ohio Historic Inventory form was updated, but it has been reported as being outside the Area of Potential Effects (NRHP listed and HIG00002113). There are also 10 previously mapped cemeteries that were located within the study area, but outside the APE for indirect effects- no further evaluation of effects for these resources is requested.

For the five NRHP eligible historic properties, in our discussion and emails we have requested that NRHP appropriate boundaries should be established for each property, including text providing the rationale for each of the recommended boundaries. Useful information in support of this product would typically include a description of the current legal parcel associated with the building, as well as a comparison to the likely historic boundaries within the period of

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Susan Lawson
October 28, 2019

significance that are likely to have been associated with each structure. This is an important work product that will support discussions to resolve the status of each property relative to potential project effects.

We have also requested a detailed effect assessment for each eligible property that evaluates potential effects on the five NRHP eligible historic properties. This analysis should include impacts related to the solar panels, power lines, substation, any staging areas, etc. A visual assessment from the property to the project site is likely to be worthwhile in support of your effect assessment, as well as any rendering that might show the eligible property in context with nearby project structures. Please do include effects other than simple visual effects, where appropriate, including temporary effects related to construction.

In support of consultation to resolve effects on the five eligible historic properties, it will be helpful to have an up-to-date project description and/or mapping showing likely project activities across the project area. We recommend that you provide additional details about these five sites on new graphics so we can better follow your reasoning on the individual effect determinations.

If your client agrees, it would be useful in this next submission if you were to provide recommendations about ways to reduce or avoid any identified effects at this stage. If there are any properties where you determine that it is likely that there will be adverse effects, your recommendations about mitigation opportunities would be welcome. We also asked for information about outreach to any property owners or local groups who should be part of the discussion as we move towards resolving this project review. We want to be made aware of any concerns that have been expressed that relate to historic properties.

We appreciate your cooperation with the continuing review of this project. If you have any questions about this letter or issues related to the review, please contact Lisa Adkins or Krista Horrocks at 614-298-2000 or by email.

Sincerely,



Lisa Adkins, Architecture Reviews Mgr.
Dept. of Resource Protection & Review

RPR Serno: 1080727

OHIO HISTORY CONNECTION

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in

Case No(s). 17-1152-EL-BGN

Summary: Correspondence Notice of Compliance with Certificate Condition No. 14 - Historical Resources electronically filed by Ms. Julia M Mancinelli on behalf of Hillcrest Solar I, LLC