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March 17, 2020

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

Re: Case No. 17-774-EL-BGN

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

Compliance with Condition 13--SHPO Comments on Archaeological Resources Survey and Cultural Resources Investigation

Dear Ms. Troupe:

Vinton Solar Energy LLC ("Applicant") is certified to construct a solar-powered electric generation facility in Vinton County, Ohio, in accordance with the order issued by the Ohio Power Siting Board ("OPSB") in the above-referenced case.

At this time, the Applicant is filing two additional letters (attached hereto) from the State Historic Preservation Office regarding the Archaeological Resources Survey and the Cultural Resources Investigation—for purposes of compliance with Condition 13 of the OPSB's September 20, 2018 Order in this case.

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)

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150 East Gay Street, Suite 2400

Columbus, Ohio 43215

Attorneys for Vinton Solar Energy LLC

cc: Jim O'Dell
4814-8666-7959 v1 [39579-29]



(Sent from SHPO by Email only)

In reply refer to
2017-VIN-39428

February 8, 2019

Gabriel Klooster, Associate, Renewable Development
Invenergy
One South Wacker Drive, Suite 1800
Chicago, IL 60606

Re: Vinton Solar Energy, Supplement 17-0774-EL-BGN
Elk Township, Vinton County, Ohio

Dear Mr. Klooster,

This is in response to correspondence from your office dated January 31, 2019, transmitting the archaeological report titled "Phase I Cultural Resources Investigation of the Vinton Solar Energy Center Transmission Line, Elk Township, Vinton County, Ohio" by James N. Greene, dated January 2019. 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 proposed aerial electrical transmission line extends for approximately 500 m from the area proposed for the solar farm construction to the Elk Substation on the east side of the Village of McArthur. The archaeological survey presented in the January 2019 report completes an intensive survey along the aerial electrical transmission line corridor. The survey included pedestrian walk-over and shovel testing. No archaeological sites were identified. The archaeologists did not observe any earthen mounding along the bluff edge that could indicate the presence of a prehistoric burial mound and as a result the archaeologists do not recommend any further investigation along the corridor near the bluff edge. The SHPO agrees with this conclusion. The archaeologists noted the presence of an older home near the existing Elk Substation, however they did not observe or recover any evidence of an archaeological midden in the portion of the corridor crossing the Elk Creek floodplain and extending to the substation. No further archaeological work was recommended for this section of the corridor. The SHPO agrees with this conclusion.

The SHPO understands that it is important during this stage of planning for this project to identify a viable transmission line corridor to connect the solar farm to the grid. Because the survey along the corridor did not result in the identification of any cultural resource that would be directly affected by the construction of an electrical transmission line, the SHPO agrees that the corridor provides a viable connection. No further coordination with this office is necessary for the transmission line corridor portion of the project unless there is a change in the scope. If new or additional information on historic properties or effects to historic properties are discovered this office should be notified.

Mr. Gabriel Klooster
February 8, 2019
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There is much more work for us to do to complete the required consideration of the effects of the project on cultural resources. The SHPO looks forward to the receipt of reports for both architecture-history and archaeological surveys of the solar farm area pursuant to previously provided SHPO recommendations as the development of the project proceeds towards construction.

Any questions concerning this matter should be addressed to David Snyder 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 (Serial Number 1077472)

xc: Jonathan Pawley, OPSB
James Greene, TRC Solutions



In reply refer to
2017-VIN-39428

November 6, 2017

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

Re: Vinton Solar Energy 17-0774-EL-BGN
Elk Township, Vinton 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 700 acres in Elk Township, Vinton County, Ohio. The September 26, 2017 correspondence transmits work plans for the archaeological and architecture-history surveys for the Vinton 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 inclusion of a very brief context on the quarrying and use of Zaleski chert to provide a basis for the evaluation of archaeological sites where the assemblage includes primarily Zaleski chert.
- As noted on Page 6, archaeological site 33Vi374 was recorded within a planned strip-mined area however the available information indicates that this area was not severely disturbed by the mining activities. We recommend inclusion of the general area (along Yankee Ridge) for this site in the Phase I archaeological survey even though it is within the boundaries of the strip mined area.
- We recommend the inclusion in the Phase I survey of the relative short aerial electrical line connecting to the grid (along State Route 93) in order to systematically look for significant archaeological sites that the line may extend across as it extends from the solar panel areas to the substation location at the base of the ridge outside of McArthur.
- 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- Vinton Solar Energy
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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 McArthur 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).
- We recommend that the architecture-history survey include photographs with basic locational information of streetscapes for the eastern half of McArthur (east of State Route 93) regardless of your assessment on whether or not the property is in the viewshed of the project (see Page 8).
- We recommend that the architecture-history survey include photographs with basic locational information of any buildings and structures within the eastern half of McArthur that on initial inspection appear to be older than 125 years old 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)

Jonathan Pawley, Ohio Power Siting Board

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Case No(s). 17-0774-EL-BGN

Summary: Notice of Compliance with Condition 13--SHPO Comments on Archaeological Resources Survey and Cultural Resources Investigation electronically filed by Christine M.T. Pirik on behalf of Vinton Solar Energy LLC