

November 10, 2020

VIA ELECTRONIC FILING

Ms. Tanowa Troupe
Administration/Docketing
Ohio Power Siting Board
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: In the Matter of Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC for a Certificate of Environmental Liability and Public Need for a 100 MW Solar-Powered Electric Generating Facility in Clay and Whiteoak Townships in Highland County, Ohio Case No. 20-1288-EL-BGN (Before the Ohio Power Siting Board) / Supplement to Application / SHPO Final Concurrence

Dear Ms. Troupe:

This letter serves to supplement the Application filed on September 2, 2020 and deemed accepted and complete on November 2, 2020 for the New Market Solar Farm, a 100 MW electric generating facility to be located on approximately 1,116 acres in Clay and Whiteoak Townships in Highland County, Ohio ("New Market Solar" or "Project"). The Project will consist of two separate and distinct facilities: (1) New Market Solar I, a 65 MW facility that will be developed, constructed and operated by Hecate Energy Highland 4 LLC and will occupy 582 acres of the Project site; and (2) New Market Solar II, a 35 MW facility that will be developed, constructed, and operated by Hecate Energy Highland 2, LLC and will occupy 222 acres of the Project site.

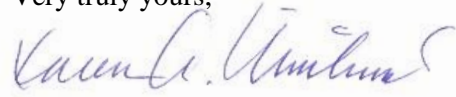
Attached for filing are the following documents:

- November 5, 2020 Letter from J. Schweikart, Project Reviews Manager, Ohio State Historic Preservation Office, to W. Green, Terracon Consultants, Inc. Re: Section 106 Review: FINAL REPORT: Phase I Cultural Resources Survey at the Proposed New Market I Solar Farm Highland County, Ohio; and
- November 9, 2020 Letter from J. Schweikart, Project Reviews Manager, Ohio State Historic Preservation Office, to W. Green, Terracon Consultants, Inc. Re: Section 106 Review: FINAL

REPORT: Phase I Cultural Resources Survey at the Proposed New Market II Solar Farm Highland County, Ohio.

If you have questions or need additional information, please contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Karen A. Winters", is written over a light blue rectangular background.

Karen A. Winters

cc: Patti Shorr, Hecate Energy LLC
Jared Wren, Hecate Energy LLC
Emily Kosmalski, Terracon Consultants, Inc.
Danelle Gagliardi, Squire Patton Boggs (US) LLP



In reply refer to:
2020-HIG-49414

November 5, 2020

William Green, RPA #10387 Principal/Department Manager
Natural and Cultural Resource Services
Terracon Consultants, Inc.
521 Clemson Road
Columbia, South Carolina 29229
Email: Bill.Green@Terracon.com

RE: Section 106 Review: FINAL REPORT: Phase I Cultural Resources Survey of Approximately 822 Acres at the Proposed New Market I Solar Farm Highland County, Ohio (Terracon Project No. 73197284) [OHPO Project No. 2019-HIG-48995]

Dear Mr. Green:

This letter is in response to your correspondence October 7, 2020, including the revised Phase I cultural resources survey report for the above-referenced project which was received by the Ohio State Historic Preservation Office (SHPO) on October 9, 2020. These investigations were done in order to fulfill requirements of the Ohio Power Siting Board (OPSB) pursuant to Ohio Administrative Code (OAC) §4906-4-08(B), and was conducted by Terracon Consultants, Inc. (Terracon) under contract to Hecate Energy Highland 4, LLC. These comments of the SHPO are made in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and the associated regulations at 36 CFR Part 800.

Archaeology Comments:

As per our comments and review, dated October 1, 2020 of the previous draft Phase I Cultural Resources Survey report, the SHPO offered two requests concerning the archaeology section of this Phase I report:

- 1) Inclusion of photographs of archaeological site 33HI500 as well some description and one or more photographs of the capped well in order to document and evaluate whether or not this archaeological site has or does not have the potential for sub-surface integrity and/or holds the potential for significant archaeological information; and,
- 2) Full references to all the publications cited for estimations of artifact manufacture dates must be included in the References Cited section, and that the References Cited (Section 7.0) should be entirely organized in alphabetical order.

William Green, RPA #10387, Principal/Department Manager
Terracon Consultants, Inc.
New Market I Solar Farm, Highland County, Ohio
(2020-HIG 49414)
November 5, 2020
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As indicated in your correspondence dated October 7, 2020, since photographs for Site 33HI500 are not available, a brief description of the mid-twentieth century concrete well capped with a concrete slab has been added to the text for this archaeological site as requested. Furthermore, the SHPO appreciates the addition of the missing references cited to this final version of the Phase I Cultural Resources Survey Report as was requested. Note however, for future reports that not all references in Section 7.0 have yet been properly listed in alphabetical order (e.g. Fletcher et al (1996); Goodyear (2005); Goodyear & Sain (2018); Norfolk & Western Railway Company (1916); and Nye & Keener (2013); however, the SHPO is not requesting an additional revision of this Phase I cultural resources survey to address this minor error.

History/Architecture Comments:

As per our comments and review dated October 1, 2020, the SHPO reiterates the following:

Twenty (20) previously recorded and sixteen (16) newly recorded above ground resources, 50 years and older, were identified within the 0.5-mile Area of Potential Effect (APE). Out of the thirty-six total resources surveyed, two Ohio Historic Inventory (OHI) sites were recommended as potentially eligible for listing in the National Register of Historic Places:

- OHI #HIG0036313 (Maple Grove School)
- OHI #HIG0037113 (ca. 1860s Flat Barn)

The SHPO agrees with these National Register of Historic Places (NRHP) recommendations. The report also recommends that the solar farm project will have **No Effect** on any of the NRHP eligible above ground resources. The SHPO also agrees with this effect recommendation for the project.

Based on this information, it is our opinion that this project will have **no affect** any archaeological sites, or any other type of historic property or cultural resources. Therefore, no further cultural resources coordination is required unless the scope of work changes or archaeological deposits or human remains are discovered during the course of the project.

Please be advised that this is a Section 106 decision and that this review decision may not extend to other SHPO programs.

If you have any questions concerning archaeology please contact me at jschweikart@ohiohistory.org, or Department Head, Diana Welling dwelling@ohiohistory.org concerning history/architecture comments.

Sincerely,



John F. Schweikart, Project Reviews Manager (archaeology)
State Historic Preservation Office

Serial No. 1085846



In reply refer to:
2020-HIG-49415

November 9, 2020

William Green, RPA #10387 Principal/Department Manager
Natural and Cultural Resource Services
Terracon Consultants, Inc.
521 Clemson Road
Columbia, South Carolina 29229
Email: Bill.Green@Terracon.com

RE: Section 106 Review: FINAL REPORT: Phase I Cultural Resources Survey at the Proposed New Market II Solar Farm Highland County, Ohio
(Terracon Project No. 73197284) [OHPO Project No. 2019-HIG-48665]

Dear Mr. Green:

This letter is in response to your correspondence October 7, 2020, including the revised Phase I cultural resources survey report for the above-referenced project which was received by the Ohio State Historic Preservation Office (SHPO) on October 12, 2020. These investigations were done in order to fulfill requirements of the Ohio Power Siting Board (OPSB) pursuant to Ohio Administrative Code (OAC) §4906-4-08(B), and was conducted by Terracon Consultants, Inc. (Terracon) under contract to Hecate Energy Highland 4, LLC. These comments of the SHPO are made in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and the associated regulations at 36 CFR Part 800.

Archaeology Comments:

As per our comments and review, dated October 1, 2020 of the previous draft Phase I Cultural Resources Survey report, the SHPO offered three requests concerning the archaeology section of this Phase I report:

1. Mapping for archaeological site 33HI466 and site 33471 (Figure 20 and Figure 25) An explanation is needed as to why shovel testing was stopped to the north, to the east, and to the south for archaeological site 33HI466, and as to why shovel testing was stopped to the north and south of shovel test unit 1103-5 at archaeological site 33HI471.
2. Clearly document that all archaeological sites discussed in the document were previously recorded during the Highland County 300 MW Solar Project (Sain et al. 2020).
3. Add the three missing references as requested (Azizi et al. 1996; Boitnott n.d., and 3) Hume 1991.

All three of these comments have been addressed to the satisfaction of the SHPO in the revised document.

William Green, RPA #10387, Principal/Department Manager
Terracon Consultants, Inc.
New Market II Solar Farm, Highland County, Ohio
(2020-HIG 49415)
November 9, 2020
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History/Architecture Comments:

As per our comments and review dated October 7, 2020, the SHPO reiterates the following:

Thirty (30) above ground resources, 50 years and older, were identified within the 0.5-mile Area of Potential Effect (APE). Out of the thirty resources surveyed, three Ohio Historic Inventory (OHI) sites were recommended as potentially eligible for listing in the National Register of Historic Places (NRHP):

- OHI #HIG0037113
- OHI #HIG0041414
- OHI #HIG0041614

The SHPO agrees with these NRHP recommendations. In addition, one resource, OHI #HIG0041714, was not evaluated due to limited access from the right-of-way.

The report also recommends that the solar farm project will have No Effect on any of the above ground resources, eligible or unevaluated. The SHPO agrees with this effect recommendation for the project. The SHPO agrees with these National Register of Historic Places (NRHP) recommendations. The report also recommends that the solar farm project will have **No Effect** on any of the NRHP eligible above ground resources. The SHPO also agrees with this effect recommendation for the project.

Based on this information, it is our opinion that this project will have **no affect** any archaeological sites, or any other type of historic property or cultural resources. Therefore, no further cultural resources coordination is required unless the scope of work changes or archaeological deposits or human remains are discovered during the course of the project.

Please be advised that this is a Section 106 decision and that this review decision may not extend to other SHPO programs.

If you have any questions concerning archaeology please contact me at jschweikart@ohiohistory.org, or Department Head, Diana Welling dwelling@ohiohistory.org concerning history/architecture comments.

Sincerely,



John F. Schweikart, Project Reviews Manager (archaeology)
State Historic Preservation Office

Serial No. 1085851

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/10/2020 2:39:20 PM

in

Case No(s). 20-1288-EL-BGN

Summary: Correspondence Supplement to Application - SHPO Final Concurrence
electronically filed by Ms. Karen A. Winters on behalf of Hecate Energy Highland 4 LLC