# Exhibit X Cultural Resources Work Plan and SHPO Consultation







In reply refer to: 2020 MAR-49369

December 9, 2020

Anne B. Lee, M.A., RPA, Principal Investigator/Asst. Regional Director 4608 Indianola Avenue, Suite C, Columbus, OH 43214

email: alee@chg-inc.com

RE: Section 106: Early Coordination: Follow Up SHPO Review & Comments: Work Plan for Phase I Archaeology Survey Fieldwork: Marion County Solar Project, Marion County, Ohio.

Dear Ms. Lee:

This letter is in response to your correspondence dated November 11, 2020, regarding the above-referenced project. The 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.

Thank you for adjusting your survey methodology in accordance with our recommendations. Do not hesitate to contact me at jschweikart@ohiohistory.org concerning your proposed work plan or any other aspect of your upcoming Phase I archaeological survey fieldwork for this proposed project.

Sincerely,

John F. Schweikart, Project Reviews Manager (archaeology)

State Historic Preservation Office

cc: Elaine Robinson, CHG, Inc., Courtney Dohoney, Stantec; Lauren Devine, Savion Energy; Sarah Moser, Savion Energy

Serial No. 1086273



ajweir@chg-inc.com

#### **OHIO OFFICE**

4608 Indianola Avenue, Suite C Columbus, OH 43214 P: (614) 549-6190 | F: (614) 549-6209

November 11, 2020 OH-0225 SHPO ID **2020 MAR-49369** 

John Schweikart Resource Protection and Review Ohio State Historic Preservation Office 800 E. 17th Avenue Columbus, OH 43211-2497

**Subject:** Marion County Solar Project

Marion, Marion County, Ohio

Work Plan for Phase I Archaeology Survey fieldwork

Dear Mr. Schweikart,

We are in receipt of your letter dated October 20, 2020, in response to the proposed Phase I archaeology fieldwork plan for the Marion County Solar Project. We will adjust our survey methodology in accordance with your office's recommendations. Specifically, we will conduct pedestrian survey at 10-meter intervals and shovel testing at 15-meter intervals across all testable portions of the project area in accordance with your office's 1994 *Archaeology Guidelines*.

Respectfully,

Som Blen

Anne B. Lee, Project Manager

cc: Courtney Dohoney, Stantec Consulting, Inc. Sarah Moser, Marion County Solar Project, LLC Lauren Devine, Marion County Solar Project, LLC File From: John Schweikart

To: alee@chg-inc.com

Cc: <u>Dohoney, Courtney</u>; <u>Lauren Devine</u>

Subject: Section 106: Early Coordination: SHPO Review & Comments: Work Plan for Phase I Archaeology Survey Field-

work: Marion County Solar Project, Marion County, Ohio. (2020-MAR-49369)

**Date:** Tuesday, October 20, 2020 7:09:19 PM

Attachments: image005.png image006.png

2020MAR49369 1085639 Ph1ArchaeologyWorkPlanReview FC.pdf

#### Greetings Anne,

Attached to this email is a letter in response to your correspondence dated September 22, 2020, regarding the above-referenced project.

The Ohio Historic Preservation Office (SHPO) concurs with your general characterization of the proposed project area, and also concurs with your plan to survey 100 percent of the project footprint- predominantly using pedestrian survey and surface collection methods. Note however, that as per the Ohio <u>Archaeology Guidelines</u> (1994:18), the methodology of a research design for a Phase I survey must be adequate to make it highly probable that all sites will be detected.

In sum, the SHPO recommends developing a work plan based on one of the following two options:

Option #1: Conduct a Phase I archaeological survey meeting or exceeding the minimum standards for field investigations as detailed in Appendix A of the Ohio Archaeology Guidelines (1994:60-65); or

Option #2: Develop and present a stratified approach that takes into account results from previous archaeological surveys in combination with project-specific background research to characterize the cultural landscape and physiographic conditions known to exist within this specific project area. This approach should identify areas of higher (and lower) probability for archaeological sites within the project area itself. This project-specific information can then be used to allow for adjustments to your field methods so that it is most probable that most archaeological sites within the direct area of potential effect (APE) will be identified. All field methods to be utilized should at least meet if not exceed minimum standards offered in Appendix A of the Ohio Archaeology Guidelines (1994:60-65).

Let me know me know if you or any of your colleagues have any questions.

Sincerely,

### John F. Schweikart Project Reviews Manager (archaeology)

Ohio State Historic Preservation Office
Ohio History Connection | 800 E. 17th Ave. Columbus, Ohio 43211
p.614.298.2000 | jschweikart@ohiohistory.org
Join Today!

For the the foreseeable future I will be working remotely. Therefore email is the best way to reach me until further notice. If you need immediate assistance please contact the Ohio State Historic Preservation Office at 614-298-2000.

The past is never dead...it's not even past – James Faulkner



The Ohio History Connection's <u>mission</u> is to spark discovery of Ohio's stories. Embrace the present, share the past and transform the future.



ajweir@chg-inc.com

#### **OHIO OFFICE**

4608 Indianola Avenue, Suite C Columbus, OH 43214 P: (614) 549-6190 | F: (614) 549-6209

September 22, 2020 OH-0225

Diana Welling Resource Protection and Review Ohio State Historic Preservation Office 800 E. 17th Avenue Columbus, OH 43211-2497

Subject: Marion County Solar Project

Marion, Marion County, Ohio

Work Plan for Phase I Archaeology Survey fieldwork

Dear Ms. Welling,

The Marion County Solar Project (project) entails the installation of solar arrays and associated infrastructure, such as collection lines, substations, access roads, and laydown yards, in an area located north of the city of Marion, Marion County, Ohio, as shown on Attachment 1. The Marion County project boundary encompasses approximately 1,048 acres of agricultural land. The actual land to be disturbed by the project infrastructure will be contained within the project boundary but the footprint has not been finalized at this time. To date, no federal nexus is present for this project, but requirements for Certificate Applications for Electric Generating Facilities as detailed in Ohio Administrative Code 4906-04 and as administered by the Ohio Power Siting Board (OPSB) must be met. The proposed work plan for completing the Phase I Archaeology survey for this project is described in the remainder of this letter.

The area is characterized by minimal topography, few unmodified natural drainages, and over 50 percent of the area within the project boundaries has poorly drained soils. In consideration of the physical characteristics of the area, consultation with the Ohio Historic Preservation Office on other solar projects in 2019 and 2020, the results of survey in similar areas in the Till Plains physiographic region, which have been shown to lack evidence of persistent and extended human use across time, Commonwealth proposes to survey 100 percent of the project footprint, using pedestrian survey and surface collection with transects arranged at 20-meter (65.6-ft) intervals. This interval is greater than the minimum standards of 5 to 10 meters (16.4–32.8 ft) for pedestrian survey outlined on page 61 of the Ohio Historic Preservation Office's 1994 *Archaeology Guidelines*. However, the increased transect interval is justified by the comparatively lower probability that archaeological sites likely to yield significant information are present in the project footprint based on other surveys conducted in similar settings in the central and northwestern Ohio. Please refer to Behrend et al.

Marion County Solar Archaeology Survey Work Plan September 22, 2020 Page 2

2006; Lee 2011, 2016; Lee et al. 2005, 2006, 2020; Lee and Glaze 2010; Schwarz 2009; and Weller 2007. Note that while some of these surveys identified a large number of sites, few of the identified sites possessed the qualities that would suggest significant information could be gained by additional investigation and none of of the sites recommended for additional investigation occur on poorly drained soils. Survey may also include shovel testing at 20-meter (65.6-ft) intervals in small areas with reduced ground surface visibility such as tree lots along or within the project footprint. If a site is identified as a result of of the Marion County survey effort, the surrounding area will be surveyed at closer intervals to delineate the site and to identify any nearby sites or site extensions.

We are asking that your office review and comment on this proposed approach.

Respectfully,

Anu Bleen

Anne B. Lee, Project Manager

cc: Courtney Dohoney, Stantec Consulting, Inc. Sarah Moser, Marion County Solar Project, LLC Lauren Devine, Marion County Solar Project, LLC

File

#### **References Cited**

Behrend, Matthew, Luella Beth Hillen, and Rachel Bankowitz

2006 Phase I Cultural Resources Literature Review for Columbus Upground Reservoirs #1 and #2, and Reconnaissance Survey for Columbus Upground Reservoirs #2, Thompson Township, Delaware County, Ohio, and Claibourne Township, Union County, Ohio. Prepared by ASC Group, Inc., Columbus, Ohio. Prepared for ms consultants, inc., Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 18076.

#### Lee, Anne B.

- 2011 Phase I Archaeology Survey for the Interstate 70-State Route 29 Interchange Improvements, Jefferson Township, Madison County, Ohio (MAD-70-10.27, PID 88245). Prepared by Hardlines Design Company, Columbus, Ohio. Prepared for the Ohio Department of Transportation, Office of Environmental Services, Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 18688.
- 2016 Phase II Assessment of Archaeological Site 33DL2858 for the DEL-CO Water Company O'Shaughnessy Reservoir Pump Station and Water Line, Concord Township, Delaware County, Ohio. OHPO Project Number 2015-DEL-30965. Prepared by Hardlines Design Company, Columbus, Ohio. Prepared for ms consultants, inc., Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 20147.

#### Lee, Anne B., and Terry L. Glaze

2010 Addendum to Phase I Cultural Resources Survey for the Proposed City of Columbus Upground Reservoir Site 3, Pump Stations, and Pipeline in Thompson, Scioto, Radnor, and Concord Townships, Delaware County, Ohio. Prepared by Hardlines Design Company, Columbus, Ohio. Prepared for ms consultants, inc., Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 20374.

#### Lee, Anne B., Roy Hampton, Steve Martin, and Heather Kenney

2005 Phase I Cultural Resources Survey for the Proposed City of Columbus Upground Reservoir Site 3, Pump Stations, and Pipeline in Thompson, Scioto, Radnor, and Concord Townships, Delaware County, Ohio. Prepared by Hardlines Design Company, Columbus, Ohio. Prepared for ms consultants, inc., Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 18085.

#### Lee, Anne B., Angela L. Haines, Katie L. Beck, and Elaine H. Robinson

2020 Phase I Archaeology Survey for the Madison Fields Solar Project, Pike Township, Madison County, Ohio. July 9, 2020. Submitted by Commonwealth Heritage Group, Inc., Columbus, Ohio. Submitted to Madison Fields Solar, LLC, Kansas City, Missouri. On file at the Ohio Historic Preservation Office, Columbus, Ohio (Ohio SHPO Reference Number 2020-MAD-48070).

#### Lee, Anne B., Roy Hampton, Steve Martin, Heather Kenney, and David Crowell

2006 Report of Phase I Cultural Resources Survey for the Proposed Sawmill Parkway Extension in Liberty and Delaware Townships, Delaware County, Ohio. Prepared by Hardlines Design Company, Columbus, Ohio. Prepared for Burgess & Niple, Inc., Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 17160.

#### Ohio Historic Preservation Office

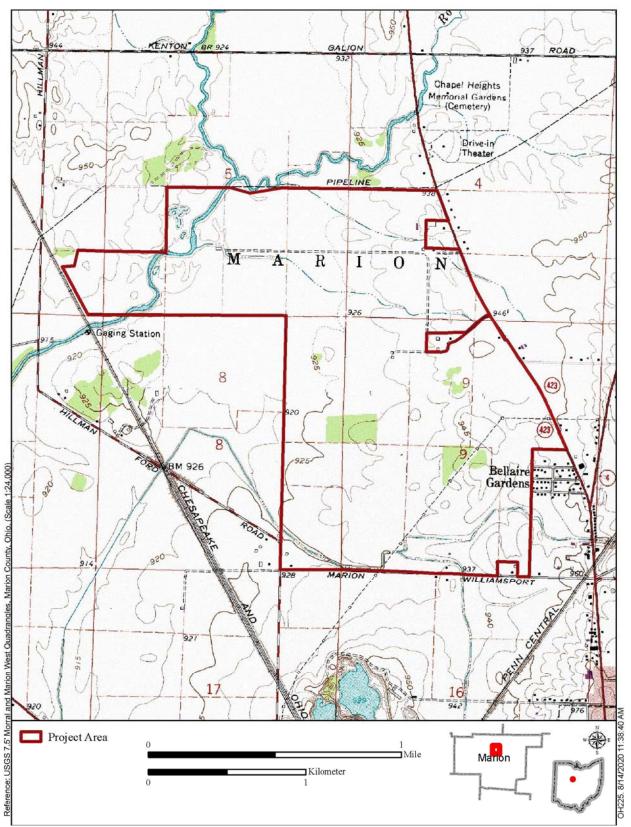
1994 Archaeology Guidelines. Ohio Historic Preservation Office, Columbus, Ohio. Available online at https://www.ohiohistory.org/OHC/media/OHC-Media/Documents/OAI ArchaeologyGuidelines.pdf

#### Schwarz, Kevin R.

2009 Executive Management Summary for Phase I Archaeological Survey of the Columbus Upground Reservoir #1. Prepared by ASC Group, Inc., Columbus, Ohio. Prepared for ms consultants, inc., Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 20375.

#### Weller, Ryan J.

2007 Phase I Cultural Resources Management Investigations for a 112.1 ha (277 ac) Industrial Development Site in Deer Creek and Jefferson Townships, Madison County, Ohio. Prepared by Weller & Associates Inc., Columbus, Ohio. Prepared for Civil and Environmental Services, Inc. Columbus, Ohio. On file at the Ohio Historic Preservation Office, Columbus, Ohio. NADB# 18044.



Attachment 1. Project boundary superimposed on portions of the Plumwood and Mechanicsburg 7.5-minute USGS topographic quadrangle maps



In reply, please refer to: 2020-MAR-49369

December 22, 2020

Anne Lee Commonwealth Heritage Group 4608 Indianola Avenue, Suite C Columbus, OH 43214

RE:

Marion County Solar Project - Revised H/A Work Plan

Near Marion, Marion County, Ohio

Dear Ms. Lee:

This letter is in response to correspondence received on December 4, 2020, and a phone call held on November 23, 2020. 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 (16 U.S.C.470 [36 CFR 800]).

The following comments pertain to the revised proposed *Work Plan for History/Architecture Reconnaissance Survey* for the Marion County Solar Project. We accept the proposed work plan with the revisions from your letter dated December 4, 2020.

Please note that this letter is for above ground resources only. The archaeological component of the project is being coordinated separately. Our office looks forward to reviewing the history architecture survey for the Marion County Solar Project. If you have any questions, please contact me at kkoehlinger@ohiohistory.org or (614) 298-2000. Thank you for your cooperation.

Sincerely,

Kristen Koehlinger, Project Reviews Manager

Resource Protection and Review

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

RPR Serial No: 1086480

## HISTORY/ARCHITECTURE CORRESPONDENCE



ajweir@chg-inc.com

#### **OHIO OFFICE**

4608 Indianola Avenue, Suite C Columbus, OH 43214 P: (614) 549-6190 | F: (614) 549-6209

December 4, 2020 OH-0225 OHPO Id: 2020-MAR-49369

Kristen Koehlinger Resource Protection and Review Ohio State Historic Preservation Office 800 E. 17th Avenue Columbus, OH 43211-2497

**Subject:** Marion County Solar Project

Marion, Marion County, Ohio

Revised Work Plan for History/Architecture Reconnaissance Survey

Dear Ms. Koehlinger,

Thank you for taking time out of our schedule to discuss your office's comments dated September 23, 2020, and subsequent guidance on the proposed approach to the History/Architecture Reconnaissance Survey to be completed in association with the proposed Marion County Solar Project.

Based on our telephone conversation on November 23, 2020, we understand the following to be an approach that your office can concur with:

- Complete a literature review of previously identified above-ground resources within a 5-mile radius
  of the project footprint and include this literature review (illustrated by appropriate mapping) in the
  report of findings;
- Complete a topography-only viewshed analysis of an area extending 2 miles beyond the outer edge of the project footprint;
- Conduct a reconnaissance level survey of all built resources over 50 years of age within the project footprint and of all built resources over 50 years of age with a view of the project as determined by the viewshed analysis in an area extending 2 miles from the footprint. One exception to this survey approach will in the area to the south and southeast of the project footprint, which encompasses the densely-built area at the northern edge of the City of Marion;
- The more densely-built area on the northern edge of Marion is encountered approximately 0.5 miles to the south and southeast of the project footprint. In these areas Commonwealth will survey properties over 50 years of age within the viewshed on the leading two to three blocks of the densely built area. This survey effort will focus particularly in the area of N. Main Street where six buildings within 1 mile of the project footprint were documented on the OHI in 1979 as a result of a survey by the Marion County Historical Society. To assist with evaluating the setting and potential for a portion

#### OTHER LOCATIONS

December 4, 2020 2020-MAR-49369 Hist/Arch Page 2

- of the northern edge of Marion to be a historic district, streetscape photographs will be the primary method of documentation rather than detailed examination and reporting of each individual building.
- Apart from the deviation noted above, reporting will follow the 2018 Ohio State Historic
  Preservation Office guidelines for reconnaissance level surveys including completion of OHIs only
  when newly surveyed properties are recommended eligible for the NRHP or for additional research to
  determine eligibility. In addition, a current photograph and statement on current condition will be
  added to OHIs for previously recorded properties.

I hope these points accurately summarize our discussion regarding a survey approach that your office can concur with.

Respectfully,

Sou Blee

Anne B. Lee, Project Manager

cc: Courtney Dohoney, Stantec Consulting, Inc. Lauren Devine, Marion County Solar Project, LLC Sarah Moser, Marion County Solar Project, LLC Elaine H. Robinson, Commonwealth Heritage Group, Inc. file



In reply, please refer to: 2020-MAR-49369

September 23, 2020

Anne Lee Commonwealth Heritage Group 4608 Indianola Avenue, Suite C Columbus, OH 43214

RE:

Marion County Solar Project – H/A Work Plan

Near Marion, Marion County, Ohio

Dear Ms. Lee:

This letter is in response to correspondence received on August 28, 2020. 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 (16 U.S.C.470 [36 CFR 800]).

The following comments pertain to the proposed *Work Plan for History/Architecture Reconnaissance Survey* for the Marion County Solar Project. We have concerns with the proposed area of the reconnaissance level survey. Other consultants have submitted a preliminary view shed analysis using only the screening effects of the topography over a 5-mile buffer around the proposed solar farm. The consultants then use this analysis to focus their surveys. The view shed analysis also shows that the solar panels or other supporting structures can be seen for greater than the proposed 1/2-mile zone of visual impact. We would recommend that based on a view shed analysis project, all properties 50 years old or older within 2-miles of the solar arrays should be surveyed by a person who meets the Secretary of Interior's Qualification Standards, and as stated in the proposed work plan for the 1/2-mile zone of visual impact. Between 2 and 5 miles of the project, all National Register listed and determined eligible properties/districts and National Historic Landmarks must be identified as proposed in the work plan for the 0.5 to 2-mile zone. Please submit a revised work plan and a view shed analysis.

Please note that this letter is for above ground resources only. The archaeological component of the project is being coordinated separately. Our office looks forward to additional coordination for the Marion County Solar Project. If you have any questions, please contact me at kkoehlinger@ohiohistory.org or (614) 298-2000. Thank you for your cooperation.

Sincerely,

Kristen Koehlinger, Project Reviews Manager

Resource Protection and Review

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

RPR Serial No: 1085348



ajweir@chg-inc.com

#### **OHIO OFFICE**

4608 Indianola Avenue, Suite C Columbus, OH 43214 P: (614) 549-6190 | F: (614) 549-6209

August 28, 2020 OH-0225

Diana Welling Resource Protection and Review Ohio State Historic Preservation Office 800 E. 17th Avenue Columbus, OH 43211-2497

Subject: Marion County Solar Project

Marion, Marion County, Ohio

Work Plan for History/Architecture Reconnaissance Survey

Dear Ms. Welling,

The Marion County Solar Project (project) entails the installation of solar arrays and associated infrastructure, such as collection lines, substations, access roads, and laydown yards, in an area located north of the city of Marion, Marion County, Ohio, as shown on Attachment 1. The Marion County project boundary encompasses approximately 1,047.8 acres of agricultural land; the actual land to be disturbed by the project infrastructure will be contained within the project boundary. To date, no federal nexus is present for this project, but requirements for Certificate Applications for Electric Generating Facilities as detailed in Ohio Administrative Code 4906-04 and as administered by the Ohio Power Siting Board (OPSB) must be met. The proposed work plan for completing the History/Architecture reconnaissance-level survey for this project is described in the remainder of this letter.

#### Fieldwork

A reconnaissance level survey will be performed for all structures over 50 years of age within the project boundary and in an area 0.5 miles around the project boundary. In addition, any property that is listed in the National Register of Historic Places (NRHP) or determined eligible for listing in the NRHP by the Ohio State Historic Preservation Office (SHPO) in an area between 0.5 and 2 miles from the project boundary will also be resurveyed to determine if the property continues to meet the integrity requirements of the NRHP. This proposed geographic scope of the architectural history survey is felt to be appropriate because of the low vertical profile (and subsequent minimal visual impact) of the proposed solar development.

The defined survey area will be investigated using visual inspection, photography, and primary data collection of all structures. Properties will be recorded on a History/Architecture resource table and keyed to the survey map. At least one high quality digital photograph of each surveyed structure will be taken from the public right-of-way for inclusion in the report and any necessary state inventory forms.

A desktop review of properties within the project boundary and within a 0.5-mile and a 2-mile radius of the project boundary indicates that up to 120 properties that have at least one building or structure over 50 years of age may be documented as a result of this survey. This number includes the one property that has been determined eligible for listing in the NRHP (OHI MAR-347-9) that is located adjacent to the northeast side of project boundary; there are no additional NRHP determined-eligible or NRHP-listed properties within 2 miles of the project boundary.

All above-ground survey will be conducted from the public right-of-way (ROW). For those properties not visible from the ROW permission to access the property will be sought from the property owner.

#### Reporting

Reporting, including report figures, will be modeled on the History/Architecture reconnaissance survey report for the Madison Fields Solar Project (Beck et al. 2020; SHPO Reference# 2020-MAD-48070), concurred with by your office in a letter dated June 10, 2020. The report will include: a project overview; a cultural and historical context; a summary of literature review results with emphasis on those previously recorded resources within 2 miles of the project boundary; project methods; results of the survey; and preliminary NRHP eligibility recommendations.

#### Completion of Ohio Historic Inventory (OHI) forms

Ohio Historic Inventory (OHI) forms will only be completed for those resources that are recommended as needing additional research or as eligible for listing in the NRHP as a result of the survey in accordance with the *Guidelines for Conducting History/Architecture Surveys in Ohio* (OHC SHPO 2014), which do not require OHI forms for all surveyed properties documented at the reconnaissance level.

We are asking that your office review and comment on this proposed approach to completing the History/Architecture reconnaissance survey for the Marion County Solar Project.

Respectfully,

Anu Blen

Anne B. Lee, Project Manager

cc: Courtney Dohoney, Stantec Consulting, Inc. Sarah Moser, Mark Center Solar Project, LLC Lauren Devine, Savion, LLC file

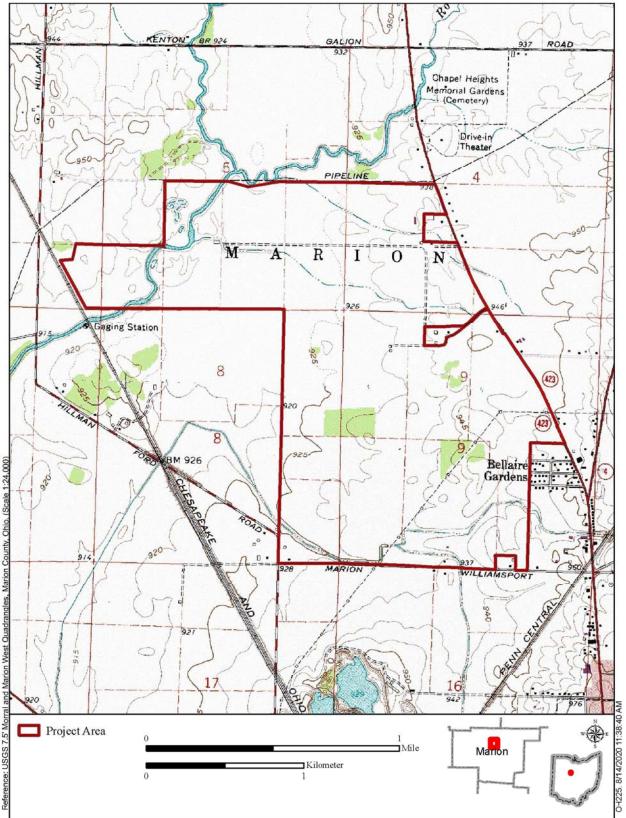
#### References Cited

Beck, Katie L., Elaine H. Robinson, and Anne B. Lee

2020 Phase I History/Architecture Survey for the Madison Fields Solar Project, Pike Township, Madison County, Ohio. May 12, 2020. Submitted by Commonwealth Heritage Group, Inc., Columbus, Ohio. Submitted to Madison Fields Solar Project, LLC, Kansas City, Missouri. Ohio SHPO Reference Number 2020-MAD-48070.

Ohio History Connection, Ohio State Historic Preservation Office (OHC SHPO)

2014 Guidelines for Conducting History/Architecture Surveys in Ohio. Ohio History Connection, Ohio State Historic Preservation Office, Columbus, Ohio. Available online at <a href="https://www.ohiohistory.org/OHC/media/OHCMedia/">https://www.ohiohistory.org/OHC/media/OHCMedia/</a> Documents/Guidelines-for-Conducting-History Architecture-Surveys-in-Ohio.pdf



Attachment 1. Project boundary superimposed on portions of the Plumwood and Mechanicsburg 7.5-minute USGS topographic quadrangle maps

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

3/5/2021 10:27:54 AM

in

Case No(s). 21-0036-EL-BGN

Summary: Application - 27 of 30 (Exhibit X – Cultural Resources Work Plan and SHPO Consultation) electronically filed by Christine M.T. Pirik on behalf of Marion County Solar Project, LLC