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March 31, 2021

Ms. Tanowa Troupe, Secretary Ohio Power Siting Board Docketing Division 180 East Broad Street, 11<sup>th</sup> Floor Columbus, Ohio 43215-3797

#### Re: Case No. 20-1605-EL-BGN

In the Matter of the Application of Birch Solar 1, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Allen and Auglaize Counties, Ohio.

# Second Supplement to Application – Programmatic Agreement with State Historic Preservation Office

Dear Ms. Troupe:

On February 12, 2021, as supplemented on March 25, 2021, Birch Solar 1, LLC ("Applicant"), filed an application with the Ohio Power Siting Board ("Board") for a certificate of environmental compatibility and public need to construct a solar-powered electric generation facility in Allen and Auglaize Counties, Ohio ("Application").

As stated on pages 76 and 81 of the Application Narrative, the Applicant has been coordinating with the State Historic Preservation Office ("SHPO") on a Programmatic Agreement outlining the remaining commitments. The purpose of this Second Supplement to the Application is to provide the executed Programmatic Agreement entered into by the Applicant and SHPO. The executed agreement is attached hereto.

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

Respectfully submitted,

<u>/s/ Christine M.T. Pirik</u> Christine M.T. Pirik (0029759) (Counsel of Record) Terrence O'Donnell (0074213) Dickinson Wright PLLC 150 East Gay Street, Suite 2400 Columbus, Ohio 43215 (614) 591-5461 cpirik@dickinsonwright.com todonnell@dickinsonwright.com Attorneys for Birch Solar 1, LLC

Cc: James O'Dell Theresa White Randal Schumacher Jonathan Pawley Ms. Tanowa Troupe Birch Solar 1, LLC Case No. 20-1605-EL-BGN Page 2

#### **CERTIFICATE OF SERVICE**

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 31<sup>st</sup> day of March, 2021.

/s/ Christine M.T. Pirik Christine M.T. Pirik (0029759)

Counsel:

jodi.bair@ohioattorneygeneral.gov kyle.kern@ohioattorneygeneral.gov

Administrative Law Judge:

michael.williams@puco.ohio.gov

4819-6364-2339 v1 [92234-1]

# PROGRAMMATIC AGREEMENT BETWEEN BIRCH SOLAR 1, LLC AND THE OHIO STATE HISTORIC PRESERVATION OFFICE FOR THE ADMINISTRATION OF A SOLAR ENERGY PROJECT IN AUGLAIZE AND ALLEN COUNTIES, OHIO

WHEREAS, Birch Solar 1, LLC ("Applicant") has proposed to construct the Birch Solar 1 Project ("Project") in Auglaize and Allen Counties, Ohio; and

**WHEREAS**, Applicant filed an Application for a Certificate of Environmental Compatibility and Public Need ("Certificate") with the Ohio Power Siting Board ("OPSB") pursuant to Ohio Revised Code ("RC") Chapter 4906 on February 12, 2021 (OPSB Case No. 20-1605-EL-BGN); and

WHEREAS, constructing the Project may affect cultural resources, including "landmarks" as that term is defined in Ohio Administrative Code ("OAC") Rule 4906-4-08(D); and

**WHEREAS**, applicants for certificates for electric generation under OAC Chapter 4906-4 and OAC Chapter 4906-5 must identify cultural resources, provide an evaluation of impacts by such facilities on such resources, and describe plans to avoid, minimize, or mitigate any adverse effects to such resources; and

**WHEREAS,** OPSB is coordinating with the Ohio State Historic Preservation Office ("SHPO") pursuant to RC Section 149.53 and Applicant is working with SHPO to fulfill its duties under the OAC as a certificate applicant to provide plans to avoid, minimize, or mitigate any adverse effects of the Project on cultural resources, including "landmarks" under the OAC.

**NOW, THEREFORE,** Applicant and SHPO have agreed to carry out their respective duties under RC Section 149.53 and OAC Chapters 4906-4 and 4906-5, in accordance with the following stipulations set forth in this Programmatic Agreement ("PA"):

#### **STIPULATIONS**

#### I. Roles and Responsibilities

- A. SHPO shall be responsible for providing technical assistance and guidance as needed and reviewing Project documentation, in accordance with SHPO's assigned duties under the RC and OAC.
- B. Applicant shall be responsible for consulting with and preparing documents for SHPO and maintaining records on the Project.
- C. Applicant shall utilize persons meeting the applicable Professional Qualification Standards set forth in the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* to conduct identification of cultural resources.

#### II. Archaeological and Cultural Resource Review Phasing

#### A. Phase 1: Complete Archaeological and historic/architectural surveys

Applicant initiated archaeological and historic/architectural surveys through Weller & Associates, Inc. ("Weller"), who coordinated with SHPO to determine an approved work plan for the historic/architecture and archaeology field surveys within a 1,745-acre area of potential effect ("APE"). A consultation letter was provided to SHPO on August 10, 2020 and the archaeology work plan was approved by SHPO on September 2, 2020. Further coordination regarding the history/architecture survey scope occurred and was approved by SHPO on January 4, 2021.

Archaeological and historic/architectural surveys for the Project's OPSB certificate application were initiated in the fourth quarter of 2020 and continued into the first quarter of 2021. The architectural survey was completed in January 2020 and the report is currently in process.

Approximately 63% of the total acreage for the archaeological survey for the Project was completed during the work initiated in fourth quarter of 2020 and continuing through the first quarter of 2021. The remaining 37% will be completed in the second quarter of 2021 and report writing will extend into the third quarter of 2021. Upon completion of the fieldwork, Weller will provide SHPO with the resulting *Archaeological Survey for the Proposed Lima Birch Solar Farm in Auglaize and Allen Counties, Ohio* report.

#### B. Phase 2: Evaluate "landmarks" through research and analysis

As part of Applicant's compliance efforts before the OPSB regarding consultation and coordination with SHPO, any cultural resources identified by surveys described in Section II.A of this PA will be recorded as stipulated in the SHPO-approved survey plans and subsequently evaluated according to the eligibility criteria for listing in the National Register of Historic Places ("NRHP"). See 36 Code of Federal Regulations ("CFR") § 60.4. Technical reports will include recommendations for NRHP eligibility, as well as evaluations of the effects of the Project on identified cultural resources, if any. If a cultural

resource is determined to be eligible for listing in the NRHP and avoidance of adverse impacts is not feasible, a mitigation plan will be submitted to SHPO for review.

# C. Phase 3: Develop a plan for avoiding, minimizing, or mitigating adverse effects to cultural resources, including "landmarks"

Applicant will make every effort to avoid adverse effects on cultural resources, including "landmarks" as the term is used in OAC Rule 4906-4-08(D), by adjusting Project facilities. If avoidance is not feasible, Applicant will work with SHPO to develop a minimization/mitigation plan that will be memorialized in a Memorandum of Understanding ("MOU") and may include the following mitigation treatment strategies: additional survey work, thematic or multiple property studies, NRHP nominations, offset funding for restoration of local landmarks, support for local preservation organizations, heritage tourism, development of education materials and lesson plans, and website development. It is anticipated that these or similar mitigation treatment strategies will be appropriate for the Project.

### **III. Project Review and Concurrence**

Provided that Applicant follows the phasing approach in Section II of this PA, and subject to this PA's terms, SHPO's execution of this PA constitutes its concurrence regarding avoidance or mitigation of adverse effects to cultural resources by the Project.

# IV. Technical Assistance and Educational Activities

Staff in SHPO's Resource Protection and Review ("RPR") Department will provide technical assistance and consultation as requested by Applicant, or as proposed by SHPO, in order to assist Applicant in carrying out the terms of this PA.

# V. Post-Review Discovery

In the event that Applicant discovers a previously unidentified site within the APE that may be eligible for listing in the NRHP that would be affected by the Project, Applicant shall promptly stop work in the immediate vicinity of the site and notify the OPSB and SHPO within 48 hours of the discovery.

If Applicant and SHPO concur that the discovered resource is eligible for listing in the NRHP, Applicant will consult with SHPO to evaluate measures that will avoid, minimize, or mitigate any adverse effects. Upon agreement regarding such measures, Applicant shall implement them and notify the OPSB of its action.

If Applicant and SHPO cannot reach agreement regarding the eligibility of a post-review discovery, the matter will be referred to the OPSB for review. If Applicant and SHPO cannot reach

agreement on measures to avoid, minimize, or mitigate adverse effects, the matter shall be referred to the OPSB for appropriate action.

If Applicant discovers any human or burial remains during implementation of the Project, the Applicant shall cease work immediately, notify SHPO and OPSB, and adhere to applicable State and Federal laws regarding the treatment of human or burial remains.

# VI. Dispute Resolution

Should any signatory to this PA object to actions proposed herein or dispute the meaning of this PA's terms, the disputing signatory shall serve all other signatories with notice of its objection or dispute and shall consult to resolve the objection or dispute. If the objection or dispute cannot be resolved within 30 days or service of the notice of objection or dispute, then SHPO may make a final decision on the dispute and advise Applicant to proceed accordingly.

### VII. Duration, Amendment, and Effect

This PA will continue in full force until February 1, 2022, provided that its cessation shall not affect the continued application of the measures outlined in Section V of this PA. At the request of any signatory, this PA may be reviewed for amendments at any time. This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is submitted to SHPO. Execution of this PA by Applicant and SHPO constitutes final concurrence by SHPO for purposes of OPSB review of the Project's certificate application and implementation of this PA's terms is evidence that Applicant has fulfilled its duties as an applicant with respect to cultural resources under the ORC and OAC.

#### SIGNATORIES:

#### **Ohio Historic Preservation Office**

2/22/2021

Diana Welling Date Department Head & Ohio Deputy State Historic Preservation Officer for Resource Protection & Review Ohio State Historic Preservation Office

Contact Information 800 E. 17<sup>th</sup> Ave. Columbus, Ohio 43211 (614) 298-2000 dwelling@ohiohistory.org

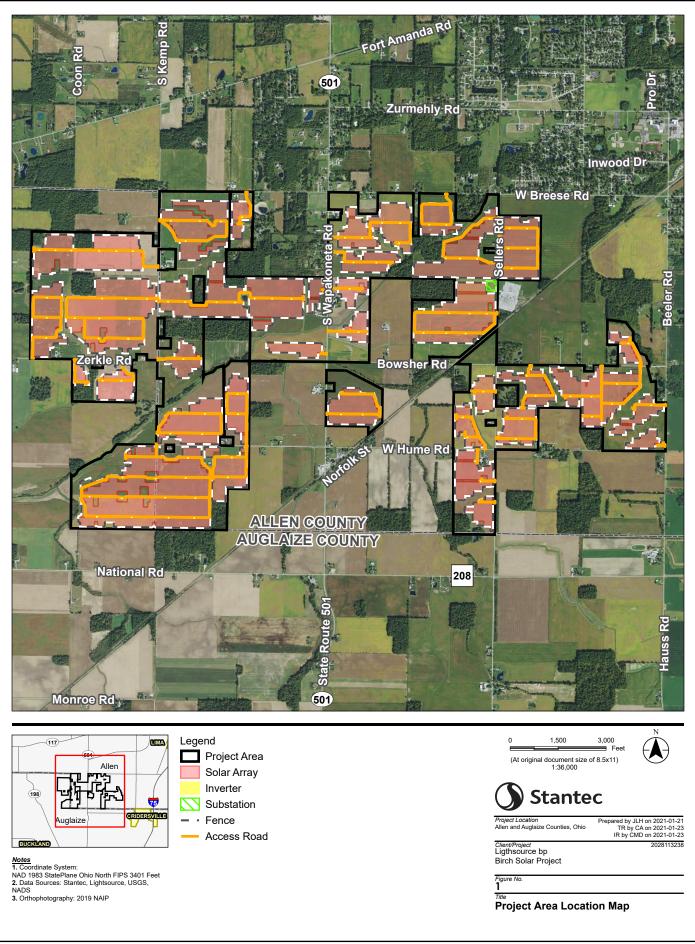
#### **Birch Solar 1, LLC**

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Kevin Smith, Chief Executive Officer, Americas Lightsource bp 2/19/2021 Date

<u>Contact Information</u> 400 Montgomery Street 8th Floor San Francisco, CA 94104 kevin.smith@lightsourcebp.com

Exhibit A: Project Location Map Exhibit B: SHPO-Approved Work Plan and Consultation Exhibit A: Project Location Map



Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

Exhibit B: SHPO-Approved Work Plan and Consultation



In reply, refer to 2020-ALL-49242

September 2, 2020

Ryan Weller Weller & Associates, Inc. 1395 W. Fifth Ave. Columbus, OH 43212

#### RE: Birch Lima Solar Panel Farm Project, Allen and Auglaize Counties, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received electronically on August 10, 2020 regarding the proposed Birch Lima Solar Panel Farm Project, Allen and Auglaize Counties, Ohio. 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 and 4906-5). 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]).

Our office has reviewed the *Technical Proposal for Phase I Cultural Resource Management Investigations for the approximately 1,900-acre Birch Lima Solar Panel Farm in Auglaize and Allen Counties, Ohio,* which includes a work plan consisting of Records Review, Phase I Survey, Define Visual Effects APE, Cultural Historic Survey, and Assessment of Effects. The Phase I Archaeological Survey will include testing of the entire project area. Survey will be completed to guidelines (1994) of the SHPO. Cultural Historic Survey will account for all aboveground resources 50 years and older within the project and visual APE's and will be completed to guidelines (2014) of the SHPO. Previous solar project submissions have provided a Visual Resource Assessment (VRA) using only the topography (not vegetation) to screen the views to all aspects of the solar farm installation. Based on these previous VRAs, the visual APE can extend up to 2 miles, and in some cases beyond. These VRAs can also show that certain areas have no visibility to the project even if the property is within 1-mile. It is recommended that a VRA be submitted to the SHPO for review to determine a more appropriate visual APE, before a reconnaissance level history/architecture survey is performed.

Our office looks forward to additional coordination for the Birch Lima Solar Panel Farm Project. If you have any questions, please contact me at (614) 298-2022, or by e-mail at <u>khorrocks@ohiohistory.org</u>, or Kristen Koehlinger at <u>kkoehlinger@ohiohistory.org</u>. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager Resource Protection and Review

RPR Serial No: 1085142



1395 West Fifth Avenue Columbus, Ohio 43212 Ph: 614-485-9435 Fx: 614-485-9439 Web: www.wellercrm.com

August 10, 2020

Ohio State Historic Preservation Office Attn: Krista Horrocks Ohio State Historic Preservation Office 800 E. 17<sup>th</sup> Ave. Columbus, Ohio 43211

# **RE:** Phase I Cultural Resource Management Investigations for the Approximately 1,900-acre Birch Lima Solar Panel Farm in Auglaize and Allen Counties, Ohio

Weller & Associates, Inc. is submitting the above titled Phase I technical proposal to the Ohio History Connection on behalf of:

Stantec Consulting Group, Inc. 3001 Washington Boulevard Suite 500 Arlington, VA 22201

As you will see below, the work plan incorporates:

- An archaeological research design adhering to the guidelines of the Ohio State Historic Preservation Office (SHPO 1994) and incorporating the entirety of the proposed project area and limits of disturbances, and;
- A history/architecture survey incorporating the entirety of the proposed project area, areas of direct/indirect effects, as well as an area extending within the proposed facilities' line-of-sight but not to exceed one mile.

The proposed project is subject to review by the Ohio Power Siting Board. This work plan is being submitted pursuant to regulations and stipulations set forth by the Ohio Power Siting Board and in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1992, U.S.C. 470f (Appendix A) and should be reviewed accordingly. We are requesting concurrence from SHPO for this proposed work plan or any necessary revisions to the work plan

Sincerely,

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Joshua D. Engle, M.A. Principal Investigator Weller & Associates, Inc.

# TECHNICAL PROPOSAL FOR PHASE I CULTURAL RESOURCE MANAGEMENT INVESTIGATIONS FOR THE APPROXIMATELY 1,900-ACRE BIRCH LIMA SOLAR PANEL FARM IN AUGLAIZE AND ALLEN COUNTIES, OHIO

Prepared for:

Ohio History Connection Ohio State Historic Preservation Office 800 E. 17<sup>th</sup> Avenue Columbus, Ohio 43211

Prepared by:

Weller and Associates, Inc. 1395 West Fifth Ave Columbus, Ohio 43212 Phone: (614) 485-9435 rweller@wellercrm.com

August 10, 2020

# TECHNICAL PROPOSAL FOR PHASE I CULTURAL RESOURCE MANAGEMENT INVESTIGATIONS FOR THE APPROXIMATELY 1,900-ACRE BIRCH LIMA SOLAR PANEL FARM IN AUGLAIZE AND ALLEN COUNTIES, OHIO

## Introduction

The project will consist of the construction of a solar panel construction area/development southwest of Lima, Ohio. The cost proposal accounts for an approximately 1,900-acre area that includes the solar array area and staging area. The cultural resource management investigations are subject to review by the Ohio Power Siting Board (OPSB) and possibly the Army Corps of Engineers (USACE). The project area mostly involves a series of agricultural fields and in a rural area that is to the southwest of Lima. This is a relatively flat or gently sloping area drained by Twomile Creek and the Ottawa River. The area includes parts of a historic Shawnee reservation and Wapakoneta village/reservation which are particularly culturally sensitive areas. The exact placement of any facility structures within the area are currently unknown, so the entire area will be subjected to survey and will be considered the project direct area of potential effects (APE). Phase I archaeological identification survey will be conducted within entirety of the proposed project area and limits of disturbances (APE). In addition, indirect effects will be accounted for in the form of an architectural survey for an area extending within the proposed facilities line-of-sight but not to exceed one mile as discussed below.

The Scope of Work (SOW) includes the following tasks to be completed to guidelines of the SHPO (SHPO 1994).

# Scope of Work

*Task 1 – Records Review.* This task will be completed using the SHPO's Online Mapping System (OMS) and available historic mapping/documents. For the archaeological survey, all previously recorded archaeological resources and previous surveys within a one-mile radius will be included in the literature review. In addition, background research will be completed to review historic maps, atlases, and other sources that might provide information for the locations of historic-era sites, areas of prior disturbance, etc. The literature review will use a 1.6 km (1 mi) study area. This allows for an understanding as to the amount of previously recorded resources near the project. In conducting the literature review, the following resources will be consulted:

- 1) An Archaeological Atlas of Ohio (Mills 1914);
- 2) SHPO United States Geological Survey (USGS) 7.5' series topographic maps;
- 3) Ohio Archaeological Inventory (OAI) files;
- 4) Ohio Historic Inventory (OHI) files;
- 5) National Register of Historic Places (NRHP) files;
- 6) Determinations of Eligibility (DOE) files;
- 7) SHPO CRM/contract archaeology files; and
- 8) County atlases, histories, historic USGS 15'series topographic map(s), and current
- USGS 7.5' series topographic map(s);
- 9) Online Genealogical and Cemetery Records

*Task 2 – Phase I Survey.* This method will include archaeological testing of the entire project area. Phase I archaeological identification survey for this project will be completed to guidelines (1994) of the SHPO. Landforms or areas with slope less than 15% that support poor visibility (e.g., areas of pasture, forest, etc.) are to be examined by systematic shovel testing. In areas where slope is in excess of 15%, pedestrian survey is the primary method of investigation.

The Phase I survey will be completed using the following methods:

- *Pedestrian Survey* this method is used to survey landforms having slopes in excess of 15%, or areas with slopes less than 15% where surface visibility is 50% or greater (e.g., plowed field). The survey transect interval is 10 m. All identified prehistoric period artifacts are collected and provenienced. Historic period sites will likely have the boundary of the deposit plotted and a representative sample of the materials collected.
- Shovel Testing this method is used to sample subsurface contexts in areas with poor visibility supporting slopes less than 15%. A shovel test pit (STP) is 50-x-50 cm square. The STPs are excavated on grid at 15 m intervals additional radial STPs are required at 5 m or 2.5 m intervals when any artifacts are discovered. Excavated soil is screened through 0.25-inch mesh. STPs are to be excavated no deeper than 1 m.
- *Visual Inspection* This method is reserved for areas that are found to be contained in standing water and not suitable for sampling. It is also used to inspect the surrounding terrain and setting to better understand the landscape.

The crew will be directly supervised in the field by an MA-level archaeologist. GPS units will be used to ensure field personnel maintain accurate survey tracts and do not extend survey outside the project survey corridor. The results of the records review and field survey will be documented to SHPO specifications.

**Task 3 – Define Visual Effects APE**. Weller will employ a visual APE that includes the area of direct effect, the project area, and an area extending within the proposed facilities line-of-sight but not to exceed one mile. The resulting "Visual APE" will be examined systematically for evidence of aboveground resources (e.g., buildings, structures, cemeteries, etc.) 50 years or older. Based on historical mapping and current aerial mapping, it appears that there are numerous resources in the study area.

**Task 4 – Cultural Historic Survey.** The approach to the field survey will account for all aboveground resources 50 years and older located within the project and visual APEs, and will be completed to guidelines (2014) of the SHPO. However, we will focus time and resources on the development of a historic context and the evaluation of likely National Register-eligible properties. This approach to the survey will include systematic survey and mapping of all buildings 50 years of age or older in the APE in order to identify those with National Register potential followed by a more intensive documentation and evaluation of potentially eligible aboveground resources, if such properties exist within the APE.

The comprehensive survey will involve the identification and preliminary evaluation of aboveground resources 50 years of age or older in the APE and the recording of each to a baseline level of documentation (including location, age, building type, building style, construction, materials, and alterations). Documentation tables completed in the field will be reviewed for accuracy and completeness and will be exported to Excel for data analysis. A summary and analysis of the field data detailing the overall architectural character of the APE will be included in the body of the report, as will representative photographs. Photographs of every resource that is 50 years of age or older, keyed to the results table, will be included as an appendix to the report.

Weller historians will analyze the data and identify properties that are clearly ineligible for the National Register due to a lack of associative significance or loss of integrity, as well as potential National Registereligible properties to advance them to the next stage of documentation and evaluation. Each property advanced to intensive survey will be documented on an Ohio Historic Inventory form following guidelines established in How to Complete the Ohio Historic Inventory (Gordon 1992). The OHI contains detailed historical and descriptive information, a location map, site plan, and additional photographs. The OHI will be submitted utilizing the SHPO I-Form electronic application. This more intensive level of documentation will produce sufficient information about historic properties to permit them to be evaluated or re-evaluated for significance according to the National Register Criteria for Evaluation. The intensive-level documentation includes collecting information that specifically explains the relationship of a property to the important themes and property types identified in the comprehensive survey. This additional research often includes establishing a chain of title, the examination of census records and tax data, placing each property within the historic context, and informant interviews if possible. The additional research will support final recommendations of non-eligibility or eligibility, and the delineation of historic property boundaries.

**Task 5 – Assessment of Effects.** Weller will describe the relationship of the proposed project to any historic properties located within the APE and apply the Criteria of Adverse Effect (36CFR800.5). An undertaking is considered to have an adverse effect on an historic property when it may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, or association. Weller will offer a determination of effect for any historic property within the APE and conclude the report with an effect finding for the project. In addition, any above ground National Register of Historic Places listed property or Determination of Eligibility property on file at the SHPO within the 1-mile literature review radius will be considered for potential effects based on OPSB rules for power generation facilities.

# **Archaeological Laboratory Work**

All recovered artifacts will be collected and transported to the Weller laboratory in Columbus, Ohio. At the laboratory, recovered artifacts will be cleaned and conserved in a manner appropriate to assure their stability. All analyzed diagnostic artifacts will be fully provenienced and labeled. All artifacts, which may provide significant interpretive value to the site, will be fully analyzed. The cultural and temporal affiliation, material of manufacture, style, function, form, etc. of recovered artifacts will be identified to the fullest extent possible. Representative photographs of diagnostic artifacts recovered during the survey will be included in the report as well as a detailed inventory of all recovered artifacts by provenience. Project field notes, records, and site photographs and any other documentation and artifacts will be retained by Weller until the final report has been accepted by SHPO. Following the acceptance of the final report, a letter regarding the disposition of the cultural materials (artifacts) identified and collected during survey for this project will be sent to the landowner.

# **Report Preparation**

The results and recommendations associated with this Phase I archaeological and architectural survey will be presented in two separate detailed technical reports prepared in accordance with SHPO guidelines (SHPO 1994). The final reports will be created in Microsoft Word and single-spaced on standard sized (8.5 x 11 inch) white paper. Page numbers will appear on all pages. Maps, photographs, and other graphics will be clearly presented. Maps will include the locations of all recorded resources, and detailed GIS and AutoCAD maps. Final reports will be suitable for submission to the SHPO.

Project field notes, records, and site photographs and any other documentation and artifacts will be retained by Weller until the final report has been accepted by SHPO. Following the acceptance of the final report, the artifacts and a copy of attendant documentation will be returned to the landowner at their request. Originals of the attendant documentation will be retained at Weller's office.

# **Human Remains**

In the unlikely event that human remains are discovered during the excavations, all work in the area of the discovery will cease and the Allen or Auglaize County Sheriff and SHPO will be notified of the discovery.

FOR Weller & Associates, Inc.:

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Signed:

Name: Joshua Engle, M.A., RPA Position: Principal Investigator

#### References

Ohio Historic Preservation Office 1994 Archaeology Guidelines. Ohio State Historic Preservation Office, Columbus, Ohio.

2014 *Guidelines for Conducting History/Architecture Surveys in Ohio*. The Ohio Historical Society and Ohio Historic Preservation Office, Columbus, Ohio.

# This foregoing document was electronically filed with the Public Utilities

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### Case No(s). 20-1605-EL-BGN

Summary: Application - Second Supplement to Application – Programmatic Agreement with State Historic Preservation Office electronically filed by Christine M.T. Pirik on behalf of Birch Solar 1, LLC