

June 2, 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. 21-508-EL-BGA, In the Matter of the Application of Madison Fields Solar Project, LLC, for an Amendment to its Certificate Issued in Case No. 19-1881-EL-BGN to Extend the Facility Footprint Within the Project Area.

**Supplement to Application – Addendums to Archaeological and Architecture SHPO Concurrence Letters**

Dear Ms. Troupe:

On May 7 and 10, 2021, Madison Fields Solar Project, LLC (“Applicant”) filed an application with the Ohio Power Siting Board for an amendment to its Certificate of Environmental Compatibility and Public Need issued in Case No. 19-1881-EL-BGN to extend the facility footprint within the project area for the construction of the 180-megawatt, solar-powered electric generation facility in Madison County, Ohio (“Application”).

Attached please find, as a supplement to the Application, the Concurrence Letters from the Ohio State Historic Preservation Office (“SHPO”) for the Archaeology Report and the Architecture Survey dated May 21 and May 20, 2021, respectively. The Applicant will continue to work with SHPO to provide SHPO with the requested information regarding the cemetery referenced in the Archaeological Concurrence Letter.

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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***Attorneys for Madison Fields Solar Project, LLC***

Cc: Matt Butler  
Theresa White  
Randall Schumacher  
Jon Pawley

## 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 2<sup>nd</sup> day of June, 2021.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

Counsel via email:

[John.jones@ohioattorneygeneral.gov](mailto:John.jones@ohioattorneygeneral.gov)

Administrative Law Judges via email:

[matthew.sandor@puco.ohio.gov](mailto:matthew.sandor@puco.ohio.gov)



May 20, 2021

In reply, please refer to:  
2020-MAD-48070

Anne B. Lee  
Commonwealth Heritage Group, Inc.  
4608 Indianola Avenue, Suite C  
Columbus, Ohio 43214

RE: Addendum Phase I History/Architecture Reconnaissance Survey for the  
Madison Fields Solar Project, Pike Township, Madison County, Ohio

Dear Ms. Lee:

This letter is in response to the report *Addendum Phase I History/Architecture Survey for the Madison Fields Solar Project, Pike Townships, Madison County, Ohio* by Commonwealth Heritage Group (2021) received on April 21, 2021. 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 4906-04). 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 previously reviewed this project and found, in a letter dated June 10, 2020, that no additional history/architecture investigations were necessary for the project as proposed. After receiving a certificate of environmental compatibility and public need from the OPSB on January 21, 2021, Madison Fields requested cultural resources surveys for the full project area rather than the project footprint to allow for maximum flexibility during final design and construction. The total project area is 1,932 acres.

The addendum survey identified 24 newly recorded resources and two previously recorded resources over 50 years of age. Commonwealth recommends two of the 26 surveyed resources (MAD0047801 and MAD0035101) for additional research to determine NRHP-eligibility. The remaining surveyed resources are recommended as not eligible due to a loss of integrity of materials and insufficient historic and architectural significance. Our office agrees with Commonwealth's recommendations of eligibility.

The information provided suggests that views to the project National Register-eligible properties will be limited or non-existent. Therefore, our office agrees that no additional history/architecture investigations are necessary to meet compliance with requirements for Certificate Applications for Electric Generating Facilities as detailed in Ohio Administrative Code 4906-04 and as administered by the OPSB.

If you have any questions, please do not hesitate to contact me at [jwilliams@ohiohistory.org](mailto:jwilliams@ohiohistory.org) or.  
Thank you for your cooperation.

Sincerely,



Joy Williams, 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: 1088301

**OHIO HISTORY CONNECTION**

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • [ohiohistory.org](http://ohiohistory.org)



In reply, refer to  
2020-MAD-48070

May 21, 2021

Anne Lee  
Commonwealth Heritage Group  
4608 Indianola Ave., Suite C  
Columbus, OH 43214  
[alee@chg-inc.com](mailto:alee@chg-inc.com)

**RE: Madison Fields Solar Project – Addendum Archaeology Report, Pike Township, Madison County, Ohio**

Dear Ms. Lee:

This letter is in response to the correspondence received April 30, 2021 regarding the proposed Madison Fields Solar Project, Pike Township, Madison County, 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]).

Additional investigations were undertaken for the Madison Fields Solar Project to allow for maximum siting flexibility during final design and construction. The previous investigations included 1,007.25-acres (407.6 ha) and identified twenty-seven (27) archaeological sites, all of which were determined not eligible for listing in the National Register of Historic Places (NRHP). This addendum survey included 925-acres (374.3 ha) and the previously agreed upon survey methodology was utilized. The following comments pertain to the *Addendum Phase I Archaeology Survey for the Madison Fields Solar Project, Pike Township, Madison County, Ohio* by Anne B. Lee et al (Commonwealth Heritage Group, 2021).

A literature review, visual inspection, and surface collection was completed as part of the investigations. No previously identified archaeological sites are located within the addendum survey area. Thirty (30) new archaeological sites were identified during survey, OAI#33MA0706-33MA0735. None of the sites are recommended eligible for listing in the NRHP. Our office agrees with this recommendation and no further archaeological survey is necessary. Morse Cemetery (OGSID#7151) was previously identified during the 2020 archaeological investigation. The addendum survey area now encompasses the cemetery boundary on all four sides with what is assumed to be an access road leading to the cemetery from Rosedale-Milford Center Road. Our office requests additional information regarding the proximity of the Madison Field Solar Project to Morse Cemetery, including the proposed fencing, the proximity of the solar arrays to the cemetery, and avoidance plan for the cemetery during construction. Our office also request clarification on the access to the cemetery (both during construction and after completion of the proposed project) for the property owners and/or public access.

The Addendum History/Architecture Survey was submitted to our office on April 21, 2021 and a coordination letter was issued from our office on May 20, 2021 determining no additional history/architecture investigations are necessary.

In conclusion, our requests additional information on the proposed project in relation to Morse Cemetery (OGSID#7151). If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1088424

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**6/1/2021 8:27:16 PM**

**in**

**Case No(s). 21-0508-EL-BGA**

Summary: Application Supplement - Addendums to SHPO Concurrence Letters -  
Archaeological and Architecture electronically filed by Christine M.T. Pirik on behalf of  
Madison Fields Solar Project, LLC