

June 22, 2021

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

Third Supplement to Application – Archaeological Coordination Letter and SHPO Concurrence Letter Regarding Cemetery.

Dear Ms. Troupe:

On May 7 and 10, 2021, as supplemented on June 2 and 7, 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 the Third Supplement to the Application, the Applicant’s Coordination Letter and the Concurrence Letter from the State Historic Preservation Office (“SHPO”) for the cemetery referenced in the Archaeological Concurrence Letter filed in this docket as part of the Supplement to the Application filed on June 2, 2021.

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)

(Counsel of Record)

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Cc: Matt Butler
Theresa White
Randall Schumacher
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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 22nd day of June, 2021.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

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4832-7779-5567 v1 [88534-2]



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commonwealthheritagegroup.com

May 27, 2021
OH-0211

ELECTRONIC ONLY

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

Subject: **2020-MAD-48070**
Madison Fields Solar Project
Pike Township, Madison County, Ohio
Addendum Phase I Archaeology Survey Report
Review for Certificate Applications for Electric Generating Facilities (OAC 4906-04)
Lead agency: Ohio Power Siting Board (OPSB)

Request for additional Information regarding the Morse Cemetery (OGSID#7151)

Dear Ms. Horrocks,

On behalf of Madison Fields Solar Project, LLC (Madison Fields), Commonwealth Heritage Group (Commonwealth) is responding to your office's request for additional information on the Morse Cemetery (OGSID#7151) dated May 21, 2021. In that letter your office noted that the survey area now extended to the area surrounding the Morse Cemetery and its associated access road, and requested the following information:

1. Proximity of proposed fencing to the cemetery;
2. Proximity of the solar arrays to the cemetery;
3. Avoidance plan for the cemetery during construction; and
4. Maintenance of property owner and public access to the cemetery during and after construction.

We offer the following in response:

1. **Proximity of proposed fencing to the cemetery.**
Fencing enclosing the solar project will be 100 feet (30.5 m) from all sides of the Morse Cemetery and access road.
2. **Proximity of the solar arrays to the cemetery.**
Solar arrays will be installed no closer than 110 feet (33.5 m) to the Morse Cemetery. In the current facility design, the solar arrays are situated over 500 feet (152.4 m) to the Morse Cemetery.

OTHER LOCATIONS

Alexandria, VA (703) 354-9737 Dexter, MI (517) 788-3550 Gainesville, FL (352) 372-2633 Littleton, MA (978) 793-2579
Milwaukee, WI (414) 446-4121 Minneapolis, MN (763) 354-9313 Ogden, UT (801) 394-0013 Tarboro, NC (252) 641-1444
Traverse City, MI (517) 262-3376 Tucson, AZ (517) 262-3376 West Chester, PA (610) 436-9000

www.commonwealthheritagegroup.com

3. Avoidance plan for the cemetery during construction.

Because the Morse Cemetery is outside of the leased area, it will be avoided during construction and later operation of the project. The access road leading to the cemetery will not be used by Madison Fields during or after construction, and project construction and operation activities will come no closer than 100 feet (30.5 m) to the Morse Cemetery when the project fencing is installed during construction.

4. Maintenance of property owner and public access to the cemetery during and after construction.

The Morse Cemetery and the dirt two-track access road leading west from Rosedale-Milford Center Road is owned by the Pike Township Trustees. Access for the property owner and public will be maintained during construction and operations because the cemetery access road will not be used during construction and is not part of any lease agreement for the proposed project and, therefore, will not be impacted once the project is in operation.

I hope that these responses satisfactorily address your office's request for additional information. Please feel free to contact me at 614-715-0436 or alee@chg-inc.com should you have questions or require additional information.

Respectfully,



Anne B. Lee, Project Manager

cc: Courtney Dohoney, Stantec, Inc.
Lauren Devine and Sarah Moser, Madison Fields Solar Project, LLC
file



In reply, refer to
2020-MAD-48070

June 18, 2021

Anne Lee
Commonwealth Heritage Group
4608 Indianola Ave., Suite C
Columbus, OH 43214
alee@chg-inc.com

RE: Madison Fields Solar Project – Additional Information Regarding Morse Cemetery (OGSID#7151), Pike Township, Madison County, Ohio

Dear Ms. Lee:

This letter is in response to the correspondence received May 28, 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]).

The coordination document provided to our office addresses the questions presented re: Morse Cemetery (OGSID#7151) in our May 21, 2021 letter. It is our understanding the proposed project will be avoiding Morse Cemetery by at least 100 feet (30.5 m) and access to the cemetery will not be affected by construction activities or after construction of the Madison Fields Solar Project. Our office appreciates the details on how Morse Cemetery will be avoided for the proposed project.

Previous Phase I Archaeological Surveys identified fifty-seven (57) archaeological sites within the project area and none were recommended potentially eligible for listing in the National Register of Historic Places (NRHP).

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.

Based on the information provided, our office agrees the proposed project will have no adverse effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorricks@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1088803

This foregoing document was electronically filed with the Public Utilities

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6/22/2021 12:19:34 PM

in

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

Summary: Application - Third Supplement to Application – Archaeological Coordination Letter and SHPO Concurrence Letter Regarding Cemetery electronically filed by Christine M.T. Pirik on behalf of Madison Fields Solar Project, LLC