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CHRISTINE M.T. PIRIK CPirik@dickinsonwright.com

August 17, 2021

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

> **Re:** Case No. 20-1362-EL-BGN - In the Matter of the Application of Clearview Solar I, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Champaign County, Ohio.

Fourth Supplemental Response to First Data Request from Staff of the Ohio Power Siting Board

Dear Ms. Troupe:

Attached please find Clearview Solar I, LLC's ("Applicant") Fourth Supplemental Response to the First Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided the attached supplement to its Phase I Archeological Survey Report dated May 12, 2021, to the State Historic Preservation Office ("SHPO") and OPSB Staff on June 23, 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) William V. Vorys (0093479) Matthew C. McDonnell (0090164) Dickinson Wright PLLC 150 East Gay Street, Suite 2400 Columbus, Ohio 43215 Phone: (614) 591-5461 Email: cpirik@dickinsonwright.com wvorys@dickinsonwright.com mmcdonnell@dickinsonwright.com Attorneys for Clearview Solar I, LLC

Cc: Theresa White Randall Schumacher Jon Pawley Andrew Conway Ms. Tanowa Troupe Clearview Solar I, LLC Case No. 20-1362-EL-BGN

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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 17th day of August, 2021.

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

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4847-5177-4964 v1 [85890-4]

EDR

Memorandum

То:	Ms. Krista Horrocks Ohio State Historic Preservation Office Ohio History Center 800 E. 17th Avenue Columbus, Ohio 43211
From:	Douglas Pippin, PhD, RPA Senior Project Manager, Archaeology EDR
Date:	June 28, 2021
Reference:	Clearview Solar Project Adams Township, Champaign County, Ohio OHPO Project No. 2020-CHP-49573 Phase IB Archaeological Survey – Additional Testing Results

Dear Krista,

On behalf of Clearview Solar I, LLC (the Applicant), Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) has prepared this memorandum as an addendum to the Phase IB Archaeological Survey Report (2021) prepared by our subconsultant Gray & Pape, Inc., for the Clearview Solar Project in Champaign County, Ohio (the Project). At the request of the Applicant, EDR tested four new leased parcels and two new collection routes for the Project (approximately 217 acres) in locations that were not previously subject to Phase IB testing (see Figure 1). This field work was conducted by EDR between June 7th and 9th, 2021.

All archaeological services provided by EDR for the Project were conducted under the supervision of a Registered Professional Archaeologist who meets the Secretary of the Interior's Guidelines (per 36 CFR, Part 61) for Professional Qualifications in Archaeology. In addition, the work was conducted in accordance with applicable portions of the Ohio Historic Preservation Office (OHPO) Archaeology Guidelines (1994) and the methodology described in the Phase IA Cultural Resources Survey, Clearview Solar Project, Adams Township, Champaign County, Ohio (2020).

In total, EDR conducted Phase IB archaeological survey for approximately 217 acres of proposed solar arrays and 0.6 linear miles of buried electrical collection lines in six locations designated as Survey Areas 4 through 6 and 21 through 23 (see Figure 1). This survey effort resulted in an area of potential effect (APE) of approximately 195.4 acres of pedestrian survey within plowed agricultural fields (per the *Archaeology Guidelines*; see Figure 2: Photolog: Photos 1-6). One Native American isolated find (4-NAIF-01), described below, was recorded during the survey. No historic period archaeological sites, building and/or structural remains (approximately 50 to 200 years in age, or older) were identified within the APE.

Isolated Find 4-NAIF-01

EDR field personnel identified one complete biface within Survey Area 4. The artifact was identified on the surface in a plowed agricultural field and was designated as 4-NAIF-01¹ (see Figure 1, Sheet 2 and Figure 2: Photo 7). The biface measures 4.8 cm in length and is derived from a light gray chert. The biface is a Palmer type dating to the Early Archaic. EDR completed an additional shovel test (A01) near to the surface find to test for the presence of additional buried artifacts and/or archaeological deposits, neither of which were identified in the shovel test soils or profile. Shovel test A01 was recorded as having an Ap-horizon measuring approximately 21 centimeters in depth and composed of brown (10YR 4/3) silty clay loam, underlain by a yellowish brown (10YR 5/4) silty clay loam B-horizon. Excavation of STP A01 was terminated at a depth of 31 centimeters. As an isolated find site 4-NAIF-01 is not recommended as eligible for listing in the National Register of Historic Places as additional investigations are unlikely to retrieve significant archaeological data for addressing research questions focused on Native American precontact lifeways.

¹ Native American Isolated Find

Based on the results of the additional testing completed on the collection lines, EDR recommends that no archaeological resources eligible for listing in the National Register of Historic Places will be adversely affected by the construction of the proposed facility in these newly tested areas. EDR does not recommend any additional archaeological investigation for the proposed project.

We sincerely appreciate your assistance with the review of this project. If you have any questions or require additional information, please contact me at <u>dpippin@edrdpc.com</u> or (585) 752-6147, or Patrick Heaton at <u>pheaton@edrdpc.com</u> or (315) 471-0688.

Thank you very much for your time.

Sincerely,

Doralas pippin

Douglas J Pippin, PhD, RPA EDR Senior Project Manager, Archaeology

Attachments

- Figure 1: Phase IB Supplemental Testing Results
- Figure 2: Photolog

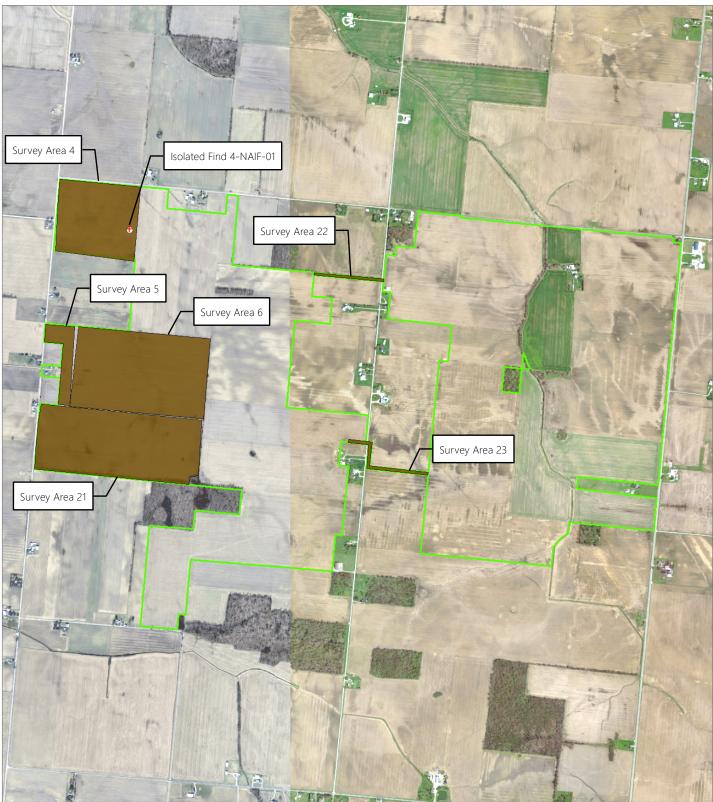
References

Gray & Pape, Inc. 2021. Phase IB Archaeological Survey Report for the Proposed Clearview Solar Project, Adams Township, Champaign County, Ohio. Report prepared for EDR by Gray & Pape, Cincinnati, OH.

Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services. D.P.C. 2020. *Phase IA Cultural Resources Survey, Clearview Solar Project, Adams Township, Champaign County, Ohio*. Report prepared for Open Road Renewables by EDR, Syracuse, NY.

Ohio Historic Preservation Office. 1994. *Archaeology Guidelines*. Ohio Historical Society, Columbus, OH.

Figure 1. Phase 1B Supplemental Testing Results



Clearview Solar Project

Adams Township, Champaign County, Ohio

Phase 1B Archaeology Survey

EDR.



0 500 1,000 2,000 Feet

Sheet 1 of 2

Prepared June 21, 2021 Basemap: OSIP "Best available, 1 ft" orthoimagery map service

Figure 1. Phase 1B Supplemental Testing Results



Clearview Solar Project

Adams Township, Champaign County, Ohio

Phase 1B Archaeology Survey



0 100 200 400 Feet



Sheet 2 of 2

Sheet 1 of 4



Photo 1

Overview of Survey Area 4 facing northwest

Photo 2 Overview of Survey Area 5 facing south



Clearview Solar Project

Adams Township, Champaign County, Ohio

Phase IB Archaeological Survey – Supplemental Testing Results

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Photo 3 Overview of Survey Area 6 facing west



Clearview Solar Project

Adams Township, Champaign County, Ohio

Phase IB Archaeological Survey – Supplemental Testing Results

Photo 4 Overview of Survey Area 21 facing east

Sheet 3 of 4



Photo 5

Overview of Survey Area 22 facing west





Clearview Solar Project

Adams Township, Champaign County, Ohio

Phase IB Archaeological Survey – Supplemental Testing Results

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Sheet 4 of 4



Photo 7 Overview of Site 4-NAIF-01

Clearview Solar Project

Adams Township, Champaign County, Ohio

Phase IB Archaeological Survey – Supplemental Testing Results

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Summary: Response - Fourth Supplemental Response to First Data Request from Staff of the Ohio Power Siting Board electronically filed by Christine M.T. Pirik on behalf of Clearview Solar I, LLC