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November 19, 2021

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Ohio Power Siting Board
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: Wild Grains Solar, LLC, Case No. 21-823-EL-BGN

Dear Ms. Troupe:

On November 16, 2021, Wild Grains Solar, LLC (“Wild Grains”) filed an application for authority to construct up to a 150 megawatt (“MW”) solar-powered electric facility in Hoaglin Township, Van Wert County, Ohio. Attached for filing in the above-referenced case is a copy of the Ohio State Historic Preservation Office’s letter in response to Wild Grain’s *Phase I Archaeological Survey*.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Kara H. Herrnstein

Attachment



In reply refer to:
2021-VAN-51711

November 17, 2021

Michael Kenneally
Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services
D.P.C. (EDR)
5 E. Long Street, Suite 700
Columbus, Ohio 43215
Email: mkenneally@edrdpc.com

RE: SHPO Review-Phase I Archaeological Survey, Wild Grains Solar Project, Hoaglin Township, Van Wert County, Ohio.

Dear Mr. Kenneally:

This letter is in response to the correspondence received on October 15, 2021 regarding the proposed Wild Grains Solar project in Hoaglin Township, Van Wert County, Ohio. The project will require a Certificate of Environmental Compatibility and Public Need from the Ohio Power Siting Board (OPSB). 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 requesting cooperation among state agencies in the preservation of historic properties, Ohio Administrative Code Chapters 4906-4-08(D). 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 proposed undertaking involves the construction of a 150 megawatt (MW) solar energy facility and its' related infrastructure within multiple land parcels totaling 2,213-acres, of which approximately 2,114-acres was surveyed. However only 1,452-acres is defined as the direct Area of Potential Effect (APE) based on the conceptual layout of the facility. The following review and comments pertain only to the *Phase I Archaeological Survey: Wild Grains Solar Project, Hoaglin Township, Van Wert County, Ohio* by Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services D.P.C. (EDR) (2021). The architectural component was submitted in a stand-alone report, and therefore the review was under a separate cover.

The archaeological survey involved a literature review, shovel test unit excavations (n=2,333), surface collection, and visual inspection of 2,114-acres. The literature review revealed two previous survey areas overlap portions of the project. These surveys, conducted in 1974 (Little Auglaize River Watershed Survey) and 2009 (Blue Creek Wind Farm), documented numerous archaeological sites within a 2.0-mile radius of the current project. Twelve previously documented archaeological sites (33VW71, 33VW74, 33VW86, 33VW88, 33VW89, 33VW90, 33VW182, 33VW285, 33VW286, 33VW290, 33VW294, 33VW295) are mapped within the current project area. Of these, four (33VW71, 33VW74, 33VW290, 33VW295) were relocated during the current survey.

The current survey also resulted in the identification of 98 previously undocumented archaeological sites, 33VW314-33VW411. Sites 33VW316, 33VW317, 33VW319-33VW323, 33VW326, 33VW327, 33VW329-33VW333, 33VW336, 33VW337, 33VW346, 33VW350-33VW353, 33VW357, 33VW359, 33VW362-33VW367, 33VW369, 33VW372, 33VW377-33VW382, 33VW384, 33VW386, 33VW390, 33VW392, 33VW393, 33VW396, 33VW398, 33VW401, and 33VW406 are documented as isolated finds of either pre-contact American Indian (n=45) or historic-era (n=1) affiliations. Sites 33VW318,

33VW335, 33VW343-33VW345, 33VW348, 33VW354, 33VW356, 33VW358, 33VW368, 33VW370, 33VW371, 33VW374-33VW376, 33VW383, 33VW385, 33VW387-33VW389, 33VW391, 33VW394, 33VW395, 33VW399, 33VW400, 33VW402-33VW404, 33VW408-33VW411 are documented as small, pre-contact American Indian diffuse lithic scatters while sites 33VW340, 33VW349, 33VW397, and 33VW407 are documented as historic-era scatters. Previously documented sites 33VW88-33VW90, 33VW182, 33VW285, 33VW286, 33VW290, and 33VW295 are documented as pre-contact American Indian lithic scatters with sites 33VW290 and 33VW295 having an historic-era component. Based on the data presented in the report, the SHPO concurs with EDR that these sites are not considered eligible for inclusion to the National Register of Historic Places (NRHP).

Sites 33VW71, 33VW74, 33VW86, 33VW294, 33VW373, and 33VW405 are pre-contact American Indian artifact scatters. Sites 33VW314, 33VW315, 33VW324, 33VW325, 33VW328, 33VW334, 33VW338, 33VW339, 33VW341, 33VW342, 33VW347, 33VW360, and 33VW361 are historic-era artifact scatters while site 33VW355 is a multi-component (pre-contact American Indian and historic-era) artifact scatter. According to the report, EDR recommends these sites are potentially eligible for the NRHP. Furthermore, the applicant has agreed to avoid these sites and agreed to a 50-ft buffer with a visual marker in the field to avoid incidental impacts during construction. The SHPO concurs with these recommendations. However, the SHPO requests that a Memorandum of Understanding (MOU) be drafted that will outline the final design plan of the solar facility and appropriate mitigation and avoidance plans for these sites. The avoidance plan should include the minimum 50-ft buffer around the established site boundary and indicate the details that will be taken to clearly mark the buffer in the field (e.g., silt fence; signs, etc.) to help minimize impacts during construction. If avoidance of these sites is not feasible, then Phase II work plans, including research design, should be developed and submitted to our office prior to the commencement of field work. The SHPO recommends as part of the additional work that a tiered or stepped approach to the Phase II be considered. The Phase II should start with a geophysical survey using a fluxgate gradiometer or equivalent instrument with a minimum of 8 readings per meter inline, with each line spaced 50 centimeters apart. After post-processing of the data, target anomalies (i.e., suspected cultural features) should be ground truthed using a soil probe (e.g., Oakfield soil probe or equivalent) to determine, at best, the anomalies potential as a cultural or natural feature. Upon completion of the geophysical survey and probing, consultation with the SHPO is recommended to determine if archaeological excavations of target anomalies is warranted at the sites. If not, then a summary report, including appropriate graphic displays (black and white) of geophysical data and results is recommended. However, if excavations are warranted, then a standard Phase II report, as outlined in the *Archaeology Guidelines* (1994), should be submitted to our office for review. We look forward to further coordination, including the review of either an MOU or Phase II work plan/research design, regarding this project. If you have any questions concerning this review, please contact me by email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,



Stephen M. Biehl, Project Reviews Coordinator (archaeology)
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1090839

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

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Case No(s). 21-0823-EL-BGN

Summary: Correspondence of Wild Grains Solar, LLC Submitting SHPO
Concurrence electronically filed by Teresa Orahood on behalf of Herrnstein, Kara