Attachment 6

Transmission Line Case No. 19-1073-EL-BTX Historic Resources Survey June 2020 Environmental Design & Research

State Historic Preservation Office Correspondence June 11, 2020





In reply refer to 2019-HUR-43954

June 11, 2020

Susan Arena EDR 217 Montgomery St, Suite 1000 Syracuse, NY 13202

RE: Emerson Creek Transmission Facility – Historic Resources Survey

Oxford Township, Erie County, Ohio

Lyme and Ridgefield Townships, Huron County, Ohio

Dear Ms. Arena:

This is in response to your correspondence, received May 13, 2020, regarding the planned Emerson Creek Transmission Facility that is being permitted by the Ohio Power Siting Board (OPSB). The comments of Ohio's State Historic Preservation Office (SHPO) are submitted in accordance with provisions of Ohio Revised Code 149.53 requesting cooperation among state agencies in the preservation of historic properties, Ohio Administrative Code Chapters 4906-1 to 4906-17, and with provisions of the National Historic Preservation Act of 1966, as amended and the associated regulations at 36 CFR Part 800.

The planned project includes the construction of the Emerson Creek Transmission Facility (ECTF) consisting of an 8.7-mile long, 345 kilovolt transmission line and a point of interconnect (POI) switchyard. The filed survey documented 9 properties that were 50 years old or older, but were not recommended as eligible for listing in the National Register of Historic Places. One property previously recorded in the Ohio Historic Inventory (OHI) was found to be no longer extant (OHI # ERI0222006). Finally, one property, located at 7703 State Route 113 West, was recommended as eligible for listing in the NRHP (OHI # ERI0222606). The SHPO agrees with these recommendations.

Based on the information submitted, it is SHPO's opinion that the proposed ECTF construction should not impact the significance or integrity of 7703 State Route 113 in a way that would alter its National Register eligibility. Therefore, we agree that the proposed ECTF will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or an unanticipated discovery of archaeological remains occurs during project construction. In such a situation, this office should be contacted as per 36 CFR 800.13.

If you have questions regarding this review, please contact me at kkoehlinger@ohiohistory.org or 614-298-2000. Thank you for your cooperation.

Sincerely,

Kristen Koehlinger, Project Reviews Manager

Resource Protection and Review

[&]quot;Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

RPR Serial No: 1084138



Historic Resources Survey

Emerson Creek Transmission Facility

Oxford Township, Erie County, Ohio Lyme and Ridgefield Townships, Huron County, Ohio

Prepared for:

Firelands Wind LLC 122 East Main Street Bellevue, Ohio 44811 https://www.apexcleanenergy.com/

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Emerson Creek Transmission Facility

Oxford Township, Erie County, Ohio Lyme and Ridgefield Townships, Huron County, Ohio

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PROJECT ABSTRACT

OHPO Project Review Number: 2019-HUR-43954

Involved State and Federal Agencies: Ohio Historic Preservation Office (OHPO)

Ohio Power Siting Board (OPSB)

Phase of Survey: Historic Resources Survey

Location Information: Oxford Township, Erie County, Ohio

Lyme and Ridgefield Townships, Huron County, Ohio

Facility Description: An 8.7-mile 345kV transmission line with POI switchyard

Historic Resources Study Area: 1,000 feet around POI and the transmission line route

USGS 7.5-Minute Quadrangle Map: Bellevue, OH; Kimball, OH

Historic Resources Survey Overview: A total of 11 resources were evaluated.

There is one historic farmstead within the Historic Resources Study Area

that appears to meet eligibility criteria for listing on the NRHP.

In addition, there are nine properties which were over fifty years old but do not appear to meet eligibility criteria for listing on the NRHP, and one

previously inventoried property that is no longer extant.

Report Authors: Susan Arena, Andrew Roblee, Grant Johnson

Date of Report: June 2020

ACKNOWLEDGEMENTS

This report was greatly assisted by the resources provided by the Ohio History Connection, Ohio Department of Transportation, the Norwalk Public Library, and the Bellevue Public Library. Kristen Koehlinger, Krista Horrocks, Lisa Adkins, and Diana Welling of the Ohio State Historic Preservation Office were instrumental in providing clarity regarding the parameters of this historic resources survey.

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APPENDICES

Appendix A. OHPO Correspondence

Appendix B. Documentation Table and Photographs

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1.0 INTRODUCTION

1.1 Purpose of the Survey

On behalf of Firelands Wind, LLC (Firelands Wind), Environmental Design and Research, Landscape Architecture, Engineering and Environmental Services, D.P.C. (EDR) prepared this Historic Resources Survey for a proposed 8.7-mile, 345 kilovolt (kV) transmission line and a point of interconnect (POI) switchyard, collectively referred to as the Emerson Creek Transmission Facility (ECTF), located in Oxford Township, Erie County, and Lyme and Ridgefield Townships, Huron County, Ohio.

The purpose of this Historic Resources Survey is to identify historic buildings that appear to satisfy National Register of Historic Places (NRHP) eligibility criteria within areas where the ECTF may result in visual impacts on cultural resources (defined as areas within 1000 feet of the ECTF; see Section 2.2) and to seek concurrence from OHPO on the results presented herein. Construction of the ECTF will not require the demolition or physical alteration of any buildings or other potential historic resources. The ECTF's potential effects on archaeological resources will be evaluated in separate (i.e., archaeological survey) reports and are not discussed further herein.

The Historic Resources Survey was conducted the week of January 13-17, 2020 by Project Architectural Historians Andrew Roblee and Susan Arena, EDR staff who satisfy the qualifications criteria per the Secretary of the Interior's Standards for Historic Preservation. Additional photography was completed the week of March 9-13, 2020. The field survey was conducted in accordance with the Ohio Historic Preservation Office's (OHPO's) *Guidelines for Conducting History/Architecture Surveys in Ohio* (Guidelines; OHPO, 2014) as well as the *Historic/Architectural Survey Plan* prepared by the Mannik & Smith Group (MSG, 2019) and approved by OHPO on December 30, 2019 (see Appendix A).

1.2 Report Organization

This report was written in accordance with the *Guidelines* (OHPO, 2014) and the *Survey Report Submission Requirements* (OHPO, 2018) and includes the results of the field investigation in narrative (written), graphic (mapping and photographs), and prescriptive (OHPO I-Form) formats included as insets, figures, and appendices. The report is organized as follows:

- Section 1.0 (Introduction) provides the purpose of the survey, summary of report organization, ECTF location and description, definitions of commonly used terms, and summary of previous consultation with the OHPO.
- Section 2.0 (Research Design) includes a detailed statement of the survey's goals and objectives, the methodology used during the survey, criteria used for resource evaluation, and expected survey results.

- Section 3.0 (Setting and Historic Context) includes a description of historic research source materials, an
 environmental context description, an account of the development of transportation routes within the Historic
 Resources Study Area (defined in Section 2.2), and history of the Historic Resources Study Area focusing on
 the theme of agriculture.
- Section 4.0 (Results of Field Investigation) includes a description of conditions and constraints encountered while undertaking the survey and the results of the survey of the Historic Resources Study Area, including newly identified and previously identified historic resources.
- Section 5.0 (Summary) concludes with the survey and effect analysis results and how the newly identified historic resources relate to the NRHP Criteria.
- Section 6.0 (References) includes full citations for sources consulted during the production of this report.

1.3 Project Location and Description

Firelands Wind is proposing to construct an 8.7-mile, 345 kilovolt (kV) transmission line with a POI switchyard in Oxford Township, Erie County and Lyme and Ridgefield Townships, Huron County, Ohio (see Figure 1). The primary purpose of the ECTF is to deliver electricity generated by the Emerson Creek Wind Farm from the collection substation¹ to the POI switchyard. A more detailed description of the proposed transmission route can be found in Section 4906-5-02(A) of the Ohio Power Siting Board (OPSB) Transmission Line Application, as amended on February 21, 2020 (Case No. 19-1073-EL-BTX).

1.4 OHPO Consultation

A *Historic/Architectural Survey Plan* was prepared by MSG and submitted to OHPO in December of 2019 (MSG, 2019). In correspondence received by MSG dated December 30, 2019, OHPO concurred with the proposed survey plan, which serves as guidance for the methodology and execution of this historic survey and associated report (Koehlinger, 2019; see Appendix A).

¹ The collection substation is being permitted as part of the Emerson Creek Wind Farm. See OPSB Case No. 18-1607-EL-BGN.

2.0 RESEARCH DESIGN

2.1 Survey Goals and Objectives

The goals of this Historic Resources Survey are to:

- Identify properties within 1000 feet of the ECTF (the Historic Resources Study Area, see Section 2.2) that appear to meet eligibility criteria for listing on the NRHP
- Photograph and document previously unidentified historic properties within the Historic Resources Study
 Area that appear to have been built at least fifty years ago, but do not appear to meet eligibility criteria for
 listing on the NRHP
- Provide updated information on previously identified historic structures and sites in the OHPO inventory within
 the Historic Resources Study Area, including: NRHP-listed, NRHP-eligible, Ohio Historic Inventory (OHI)identified resources and districts; Ohio Department of Transportation (ODOT) NRHP-eligible bridges, and
 Ohio Genealogical Society (OGS) cemeteries.

2.2 Historic Resources Study Area

The ECTF's potential indirect effect on historic resources would be a change in the historic setting of a property resulting from the introduction of the transmission line or POI switchyard. This could theoretically consist of auditory and/or visual impacts; however, the transmission line will produce minimal noise, so auditory impacts resulting from the ECTF are not considered a significant type of impact to the setting of historic resources. Therefore, potential visual impacts associated with the ECTF are the primary consideration for defining the Historic Resources Study Area.

The Historic Resources Study Area is defined as the area within 1,000 feet of the ECTF components, encompassing approximately 3.35 square miles located within Oxford and Groton Townships, Erie County, and Lyme and Ridgefield Townships, Huron County, Ohio. The Historic Resources Study Area was determined consistent with the appropriate study area for electric transmission facilities as defined in Section 4906.05 of the Ohio Revised Code and Chapters 4906-5-01 to 4906-5-07 of the Ohio Administrative Code (OAC). The Historic Resources Study Area is also consistent with correspondence with OHPO related to historic resources surveys prepared for previous transmission lines associated with energy projects in the State of Ohio.²

The Historic Resources Study Area for the ECTF is considered conservative, as it includes all areas within 1,000 feet of the ECTF regardless of potential transmission line or POI switchyard visibility. Of note is that the Historic Resources Study Area for the ECTF falls within the area of potential visibility of the Emerson Creek Wind Farm; therefore, potential

Emerson Creek Transmission Facility - Historic Resources Survey

² Timber Road IV Wind Farm (2015-PAU-33658) (EDR, 2018).

impacts to historic properties located beyond the 1000-foot Historic Resources Study Area for the ECTF will be included in the historic resources survey for the Emerson Creek Wind Farm.

2.3 Survey Methodology

An Historic Resources Survey was completed for the Emerson Creek Transmission Facility by professionals who satisfy the qualifications per the Secretary of the Interior's Standards for Historic Preservation (36 CFR 61; CFR 2004a). The Historic Resources Survey planning efforts included preparation and submission to OHPO of the amended *Cultural Resources Records Review* (EDR, 2019), and historic context research for the Historic Resources Study Area (summarized in Section 3.2), prior to conducting the survey.

Archives and repositories consulted during research included EDR's in-house collection of reference materials, online digital collections of the Library of Congress, the David Rumsey Historical Map Collection (Cartography Associates, 2020), the online resources of the Ohio History Connection (OHPO, 2020a), the Huron County Auditor's Office (Huron County, 2020), the Erie County Auditor's Office (Erie County, 2020), and the reference libraries at the Bellevue Public Library in Bellevue, Ohio and the Norwalk Public Library in Norwalk, Ohio. Historic maps reviewed included the 1868 Atlas of Ohio: Connecticut "Western Reserve" (Walling, 1868; Figure 3), 1896 Illustrated Atlas and Directory of Erie County, Ohio (Atlas, 1896), the 1903 Bellevue, OH; 1904 Sandusky, OH; 1915 Norwalk, OH; and 1915 Siam, OH USGS 1:62,500 topographic quadrangles (Figure 4), and the 1956 Toledo, OH USGS 1:100,000 topographic quadrangle (Figure 5).

Site visits within the Historic Resources Study Area were conducted by EDR staff the weeks of January 13-17, 2020 and March 9-13, 2020 to identify, evaluate, and photograph potential historic resources. The condition and integrity of all resources were evaluated based solely on the visible exterior of the structures as viewed from a public right of way. This included photographs of the building(s) (and associated property when necessary) and field notes describing the style, physical characteristics and materials (e.g., number of stories, plan, external siding, roof, foundation, and sash), condition, physical integrity, and other noteworthy characteristics for each resource. EDR's evaluation of historic resources within the Historic Resources Study Area focused on the integrity (with respect to design, materials, feeling, and association) to assess the potential architectural significance of each resource. No inspections or evaluations requiring access to the interior of buildings, or any portion of private property, were conducted as part of this assessment. The existing conditions of properties that appeared to have been built fifty years ago or more were documented by EDR's architectural historian and included in a documentation table with relevant photographs each property, regardless of apparent NRHP eligibility.

2.4 Criteria for Evaluating the Significance of Historic Resources

Historically significant properties are defined herein to include buildings, districts, objects, structures and/or sites that have been listed on the NRHP, as well as those properties that the OHPO has formally determined are eligible for listing on the NRHP. Criteria set forth by the National Park Service (NPS) for evaluating historic properties (36 CFR 60.4) state that an historic building, district, object, structure or site is significant (i.e., eligible for listing on the NRHP) if the property conveys (CFR, 2004; NPS, 1990):

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- (A) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- (B) that are associated with the lives of persons significant in our past; or
- (C) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- (D) that have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries shall not be considered eligible for the NRHP. However, cemeteries will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories (NPS, 1990):

Criterion Consideration D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events.

2.5 Expected Survey Results

The results of the CRRR prepared for the ECTF (Section 1.4) indicate that there are 9 previously identified historic properties located within the Historic Resources Study Area (see Section 3.4). Existing conditions within the Historic Resources Study Area and the general vicinity consists of an open agricultural landscape with widely dispersed farmsteads, often with relatively modern support structures and houses with additions and alterations. Based on aerial mapping, there are 32 properties within the Historic Resources Study Area, ranging from single residences to large farming complexes with multiple structures. Based on the results of the CRRR, and the existing conditions within the Historic Resources Study Area, the survey is expected to result in the identification of relatively few historic resources that appear to meet eligibility criteria for listing on the NRHP.

3.0 SETTING AND HISTORIC CONTEXT

3.1 Environmental Setting

The Facility is located in Oxford Township, Erie County, and Lyme and Ridgefield Townships, Huron County. Topography in the Historic Resources Study Area is defined by low relief, sloping gradually downward to the northeast. There are no significant changes in elevation or bodies of water present.

The majority of the landscape within the Historic Resources Study Area is that of flat, open agricultural fields. These fields are bisected by long, straight rural transportation routes and secondary connecting roads running diagonally. When not interrupted by rare woodlots, the relatively level topography within the Historic Resources Study Area allows for clear views to historic resources. Views to farmhouses and agricultural buildings within large scale farming landscapes are dependent on their distance from the public rights-of-way, existing vegetation, and other buildings or features.

3.2 Transportation Routes

The Historic Resources Study Area occupies the southwest corner of Oxford Township and limited portions of Groton, Lyme and Ridgefield Townships. The nearest cluster of residential development to the Historic Resources Study Area is the hamlet of Kimball, approximately 0.5-mile from the Facility.

Historic maps indicate that very little change has taken place to the agricultural landscape since the forests were cleared and the roads platted in the early nineteenth century. Historic maps reflect essentially unchanged condition of the established transportation routes. A railroad line, the Wheeling and Lake Erie Railway operated by the Norfolk Southern Corporation, bisects the Historic Resources Study Area running northeast-southwest and has been present since sometime before 1901 (USGS, 1901). Roadways are predominantly widely spaced, running generally along north-south and east-west axes. Roads that transverse the Historic Resources Study Area include Interstate 80/90, State Routes 113 and 99, and County Routes 15 and 43, as well as secondary routes Ransom Road, Higbee Road, and Yingling Road.

3.3 Historical Development

Record of Pre-Contact period (from approximately 15,000 years ago to approximately 500 years ago) occupation indicates an active and widespread population of Native American groups throughout Ohio. Evidence of permanent settlements by the Whittlesey people in the northeast part of the state were reported from about 1000-1650 AD³. First European contact in Ohio occurred in the late-seventeenth century with the arrival of French missionaries and later, fur

³ The Facility's potential effects on Native American archaeological sites will be evaluated in separate (i.e., archaeological survey) reports for the project and are not discussed further herein.

traders and surveyors. The French never attempted permanent settlement, and as such, maintained a mostly amicable relationship with the Native Americans. British exploration in the mid-eighteenth century led to conflict with the French as survey and trade competition increased, with both laying claim to lands in what is now northeast Ohio. Tensions between the French and British eventually led to the French and Indian War (1754-1763), also known as the Seven Years War. The British prevailed and soon after, American colonists began moving west (Aldrich, 1889; One State Many Nations, 2008; OHPO, 2020b).

A land grant given in 1662 by the British to the Connecticut colony awarded them rights to all lands between the forty-first and forty-second parallels, excluding New York and Pennsylvania. Following the Revolutionary War, in 1786, the State of Connecticut forfeited the majority of this land for the creation of the Northwest Territory (Duff, 1931). The state retained a portion of the lands occupying the northeast corner of present-day Ohio. This tract, totaling slightly less than four million acres and known as the Connecticut Western Reserve, was composed of two parts, the western part was known as the "Firelands", and the eastern part was sold to the Connecticut Land Company in 1795 and subsequently surveyed and divided into townships. Many New Englanders lost their homes and land to the devastation of the war, relocating to the Western Reserve on land that had been set aside as compensation for their losses. The new residents had been burned out of their former homes and sought refuge there, leading to the region being called the Firelands or the Sufferers' Lands. Settlement was sparse and slow though, so significant development didn't occur until after the War of 1812 (Campen, 1971; OHPO, 2020c).

Ohio was admitted into the Union as a State on March 1, 1803 and Huron County was formed in 1809, originally occupying the entirely of the Firelands. The county is predominantly rural with areas of concentrated population in Bellevue, which straddles the county line, and Norwalk, the County Seat (Baughman, 1909; OHPO, 2020d). Erie County was created in 1838 from parts of Huron and Sandusky Counties. The City of Sandusky, situated on the shore of Lake Erie, is the County Seat and the county's largest municipality with a population of approximately 25,000 (Peeke, 1916; USCB, 2018). Around 1840 the Mansfield and Sandusky Railroad was formed from two smaller lines, cutting a 47-mile long north-south transportation route through the land just east of the Historic Resources Study Area. In 1869 it was purchased by the Baltimore and Ohio Railroad, which eventually abandoned portions of the route (Peeke, 1916). By 1900, the New York, Chicago and St. Louis Railroad was operating, running southwest-northeast, and intersecting with the B & O in the hamlet of Kimball.

Despite the early establishment of major transportation routes, the land within the Historic Resources Study Area has been defined by agricultural use. Development was historically scattered and sparse, a trend that continued into the mid-twentieth century. Since that time smaller parcels have been subdivided from expansive farm tracts averaging 100 acres in size for the construction of single-family homes on one- to two-acre plots (Erie County, 2020).

3.4 Previously Identified Historic Resources

No previous historic resources surveys have been completed within the Historic Resources Study Area. The results of the CRRR prepared for the Facility (Section 1.4) indicate that there are nine OHI resources located within the Historic Resources Study Area. The locations of the identified resources are depicted on Figure 6.

4.0 RESULTS OF FIELD INVESTIGATION

4.1 Conditions and Constraints

Site visits were conducted the weeks of January 13-17, 2020, and March 9-13, 2020. Weather conditions during the site visits were typical of the season with average temperatures between 35- and 45-degrees Fahrenheit with minimal precipitation, and a partially cloudy sky. Weather did not adversely affect the ability to conduct the historic resources survey.

Views from public rights-of-way within the Historic Resources Study Area are dominated by agricultural farmland, farmsteads, rural cemeteries and rural residential development, divided by transportation corridors including multi-lane interstate highways, paved state routes, paved county highways and paved or gravel township roads. The land within the Historic Resources Study Area has been mostly cleared for agriculture and is mostly level. Existing developed features include the public roads, single family homes, and farm buildings.

The area within the Historic Resources Study Area is rural and lightly populated. Development occurs at a very low density throughout the Historic Resources Study Area and is for the most part widely spaced along, and near the edge of, roadways. Residential styles primarily include modest variants of popular nineteenth-century styles, mid-twentieth century ranches, and some contemporary styles. Agricultural development ranges from small family farmsteads that include a residence, barn, and shed, to large agricultural industrial complexes.

4.2 Results of Field Investigation

As the result of field investigation, EDR identified a total of one property which appeared to satisfy the eligibility criteria for listing on the NRHP. In addition, there are nine properties which were over fifty years old but do not appear to meet eligibility criteria for listing on the NRHP, and one previously inventoried property that is no longer extant.

The addresses, type, date of construction, and the distance to the ECTF of the resources identified as a part of this survey, as well as whether or not the property appears to satisfy the eligibility criteria for listing on the NRHP are detailed in Table 1. The locations of the resources located within the Historic Resources Study Area are depicted on Figure 7. Photographs of each property are included as Appendix B, and keyed to the map depicted on Figure 8.

Table 1. Historic Resources Survey Results

OHI Number	Address	Municipality	Resource Type and Description	Distance to ECTF (Feet)	Date of Construction*	Appears to satisfy NRHP Eligibility Criteria
ERI0215406	4102 Higbee Road	Oxford Township	Farmstead consisting of a two- story, cross-gable house and four barns.	534	1902	No
ERI0220406	12718 Patten Tract Road	Oxford Township	One-one-one-half-story, front gable house with one-story wing and porch.	672	1880	No
ERI0220606	13207 Patten Tract Road	Oxford Township	One-one-one-half-story, front gable house with wing and porch.	839	1910	No
ERI0222006	11911 Ransom Road	Oxford Township	Two-story, front gable house with wing and porch.	218	NA	No (no longer extant)
ERI0222606	7703 State Route 113 West	Oxford Township	Farmstead consisting of a two- story, brick house with flanking wings, three barns and a garage.	829	1841	Yes
ERI0224806	3820 Strecker Road	Oxford Township	One-and-one-half-story, front gable house.	795	1910	No
ERI0224906	3711 Strecker Road	Oxford Township	One-and-one-half-story, cross- gable house.	250	1910	No
ERI0241106	9211 Thomas Road	Oxford Township	Farmstead consisting of a two-story house with wing, and three barns	962	1880	No
ERI0220506	13006 Patten Tract Road	Oxford Township	Two-story, cross-gable house.	326	1898	No
N/A	5308 Yingling Road	Lyme Township	Two-story, side-gable house.	368	1807	No
N/A	4678 Sand Hill Road	Lyme Township	One-and-one-half-story residence with two barns.	470	c. 1940	No

^{*} Refers to the date of construction of the main residence indicated by the Erie County and Huron County Auditor's online databases (Erie County, 2020; Huron County, 2020).

7703 State Route 113 West (ERI0222606) is an historic farmstead consisting of a brick, Greek Revival-style influenced residence, a one-story wood bay barn, a one-story cement block barn, a metal three-car garage, and a one-story wood garage/carriage house. The farmstead is situated in an agricultural setting on a secondary state transportation route. Open farm fields encompass the property, with a few neighboring farmsteads and residences nearby. A low hedgerow bounds the east and north property lines. The house is composed of a two-story, three-bay, front gable principal block flanked by one-story, side-gable wings. The house features partial cornice returns, stone windowsills and lintels, and a sunburst fan detail in the gable. A wood-frame, bank-barn, with sliding doors on the broadside sits closest to the road. Beyond that are a wood-frame shed and two modern, metal barns. The property retains a high degree of integrity of location, materials, design, feeling, and workmanship. In 1874 and 1896 the property was owned by Lafayette H. Jennison (b.1825, d. 1912), a farmer (Stewart and Page, 1874; Atlas, 1896; US Find a Grave, 2020).



Inset 1: View northwest toward farmhouse at 7703 State Route 113 West. Note the presence of tall trees and existing transmission infrastructure in the view of and from the house.



Inset 2: View northeast toward farmhouse and barn at 7703 State Route 113 West. Note the presence of tall trees and existing transmission infrastructure in the view of and from the house.

Although the farmhouse and barn are located in a rural agrarian context, views toward these structures from the right-of-way are not looking in the direction of the ECTF; therefore, the historic setting of the farmstead is not anticipated to be impacted by the ECTF. Views toward the ECTF from the farmstead will be screened by vegetation, intervening structures, topography and distance.

One property previously listed in the Ohio Historic Inventory was found to be no longer extant:

• 11911 Ransom Road, Oxford Township (OHI ERI0222006)

In addition, the property located at 13006 Patten Tract Road (OHI ERI0220506) was determined to be incorrectly **geolocated in the OHPO's online GIS mapping service.** Survey results record the property in the correct location, as shown in Figure 6.

4.3 Expected Results versus Actual Survey Results

As described in Sections 2.5 and 3.4, based on the results of the CRRR, and the existing conditions of the Historic Resources Study Area, the survey was expected to result in the identification of relatively few historic resources which appeared to satisfy the eligibility criteria for listing on the NRHP.

The actual results of the survey reflected the expected results as a relatively few properties were surveyed. Of the 32 properties identified within the Historic Resources Study Area, only 11 appear to have been constructed fifty years ago or more. Of these 11, a total of one property was identified by EDR as appearing to satisfy the eligibility criteria for listing on the NRHP, and one was found to be no longer extant.

5.0 SUMMARY

On behalf of Firelands Wind, EDR conducted an Historic Resources Survey for the ECTF. In addition to this Historic Resources Survey, an I-form has been prepared for 7703 State Route 113 West (OHI ERI0222606) for review by OHPO in order to provide determinations of NRHP eligibility (see Appendix C).

A total of 11 properties were surveyed as part of the historic resources survey:

- One newly identified historic property (7703 State Route 113 West [OHI ERI0222606]) appeared to satisfy the eligibility criteria for listing on the NRHP
- A total of previously identified properties appear to have been constructed fifty years ago or more, but did not appear to satisfy the eligibility criteria for listing on the NRHP
- One previously identified property (11911 Ransom Road, Oxford Township [OHI ERI0222006]) is no longer extant and therefore is not eligible for listing on the NRHP

Construction of the ECTF will not require the demolition or physical alteration of any buildings or other potential historic resources. No direct physical impacts to historic properties will occur because of the ECTF.

Any potential visibility of the ECTF from 7703 State Route 113 West (OHI ERI0222606) is anticipated to be minimal due to distance and screening provided by intervening topography, as well as the presence of other built features (including existing transmission infrastructure) in the views toward and from this historic property. The historic setting of this property will not be impacted by the ECTF.

No further historic resources surveys are recommended, and no mitigation measures are proposed associated with the FCTF.

6.0 REFERENCES

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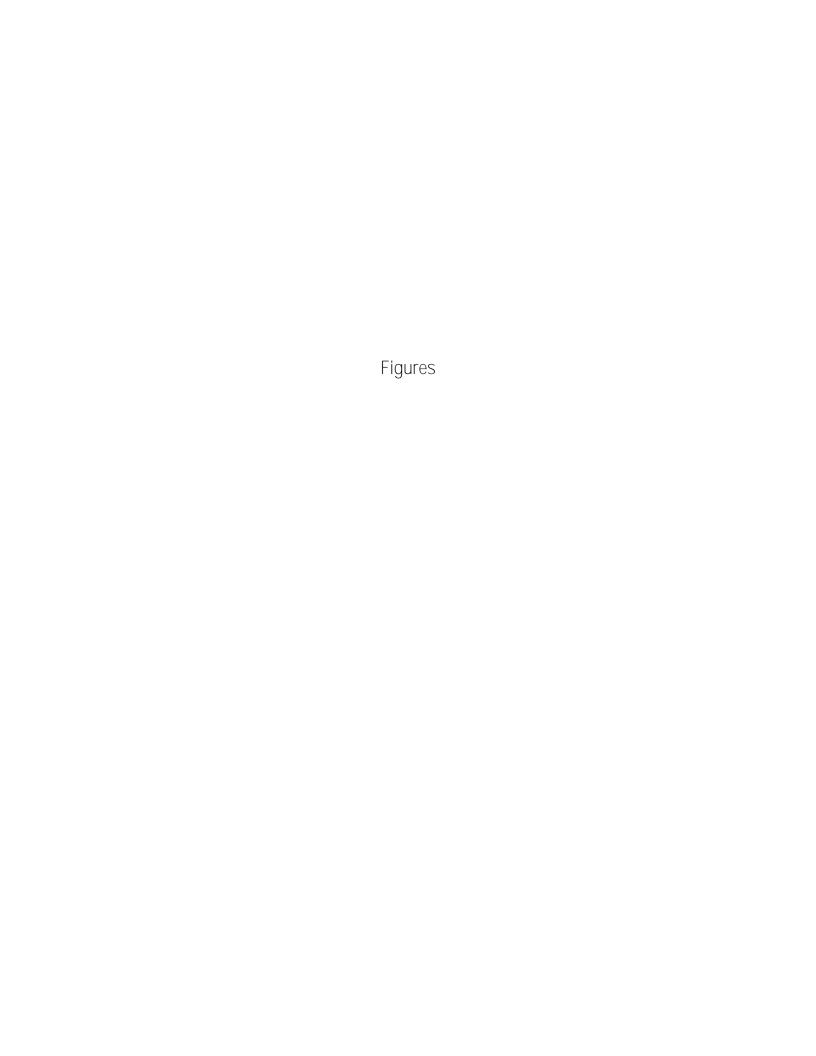
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Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Figure 1: Regional Project Facility

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service. 2. This map was generated in ArcMap on April 13, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.





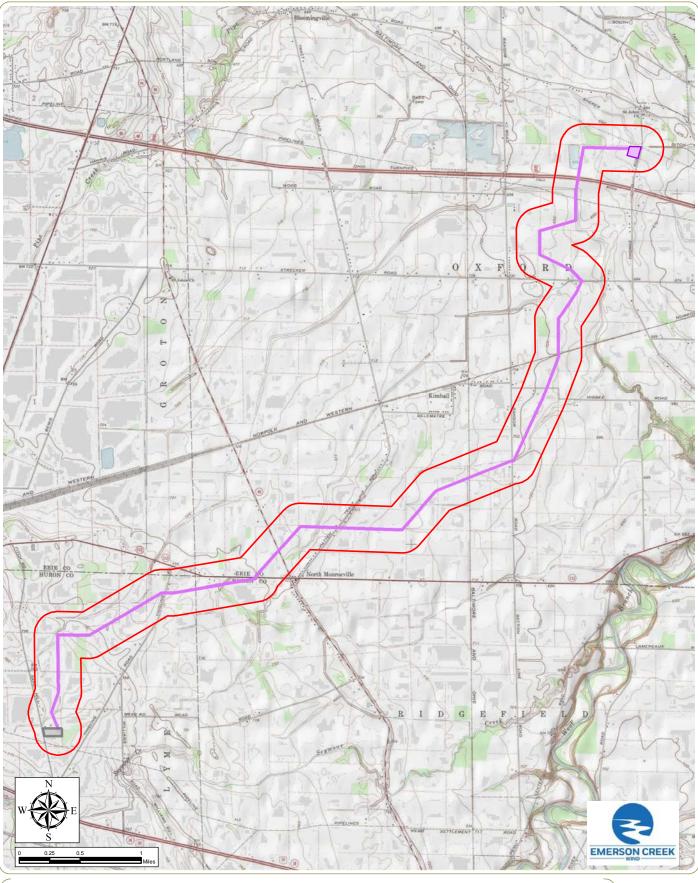


Figure 2: Facility Layout and Historic Resources

Notes: 1. Basemap: ESRI ArcGIS Online "USA Topo Map" map service, which are scanned images of United States Geological Survey (USGS) paper topographic maps. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

Preferred Transmission Line



Collection Substation





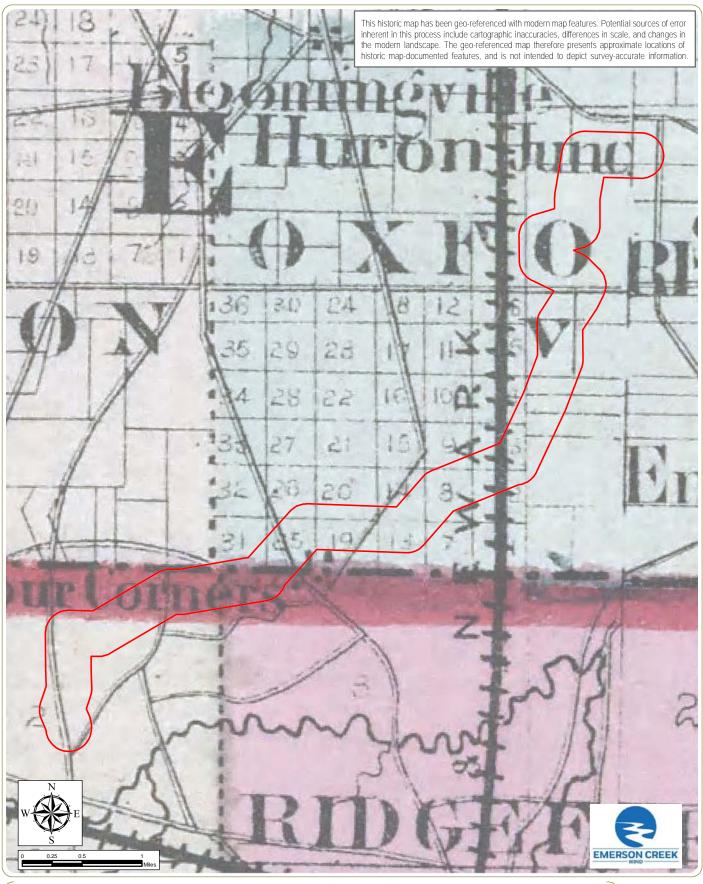
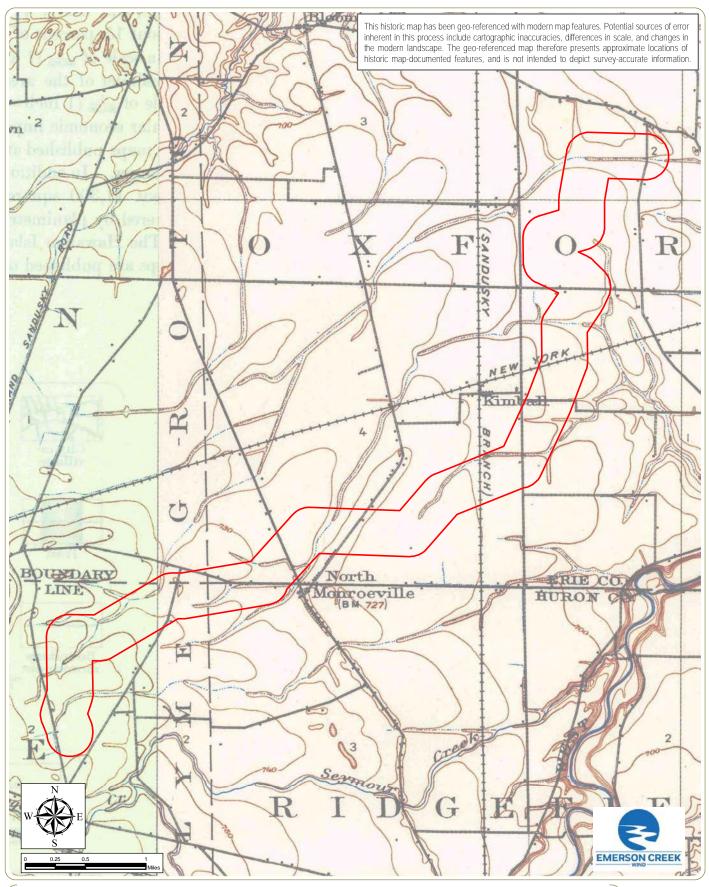


Figure 3: 1868 Walling Atlas of Ohio, Connecticut "Western Reserve"

Notes: 1. Basemap: Georeferenced map noted above. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.







Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Figure 4: 1903 *Bellevue, OH*, 1904 *Sandusky, OH*, 1915 *Norwalk, OH* and 1915 *Siam, OH* USGS 1:62500 Topographic Quadrangles

Notes: 1. Basemap: USGS 1:62500 Topographic Quadrangles listed above. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.







Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Figure 5: 1956 Toledo, OHUSGS 1:100000 Topographic Quadrangle

Notes: 1. Basemap:1956 *Toledo, OH* USGS 1:100000 Topographic Quadrangle.2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.





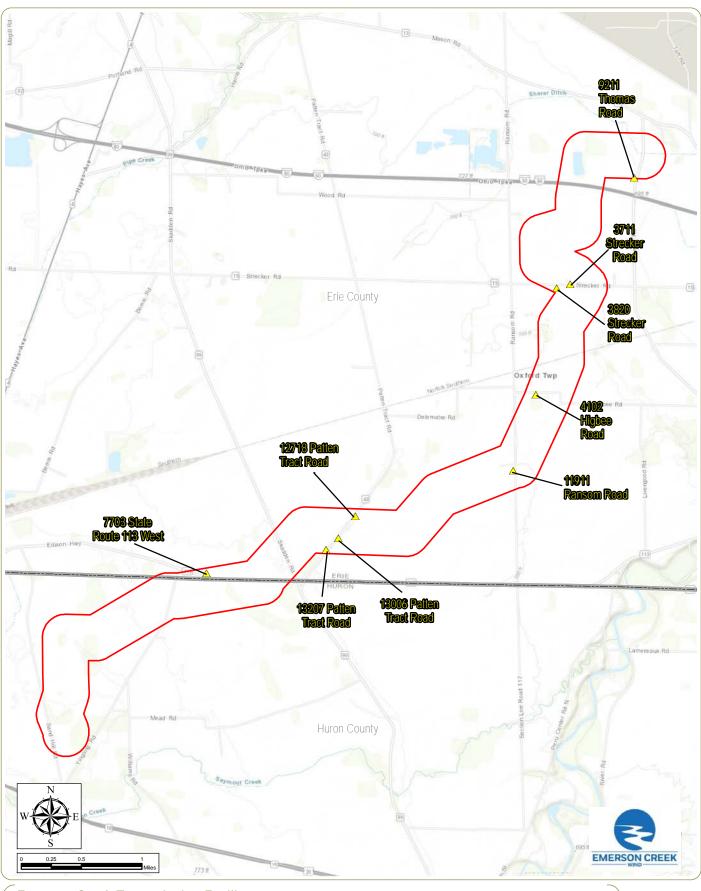


Figure 6: Previously Identified Historic Resources

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.





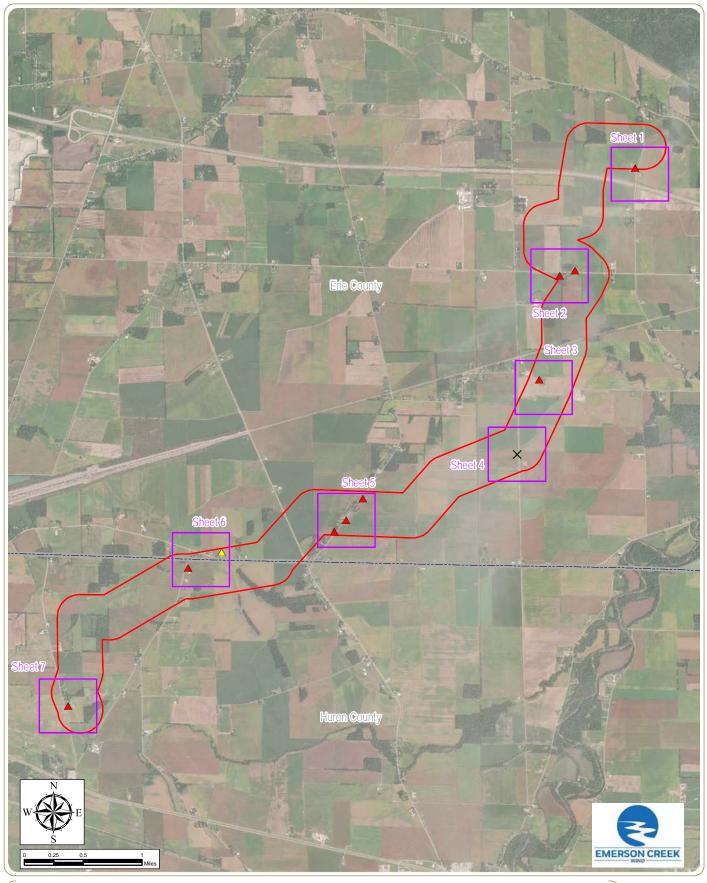


Figure 7: Historic Resources Survey Results and Photo Locations - Index

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility criteria
- Resource No Longer Extant
- Historic Resources Study Area (1,000-Foot Buffer)



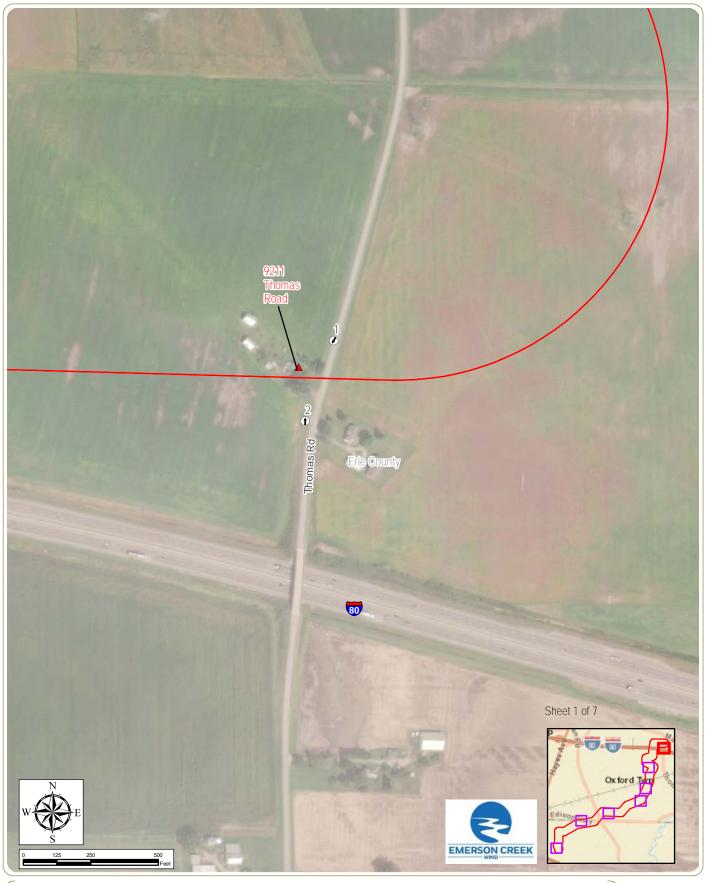


Figure 7: Historic Resources Survey Results and Photo Locations - Sheets

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility
- Resource No Longer Extant X
- Photograph Location





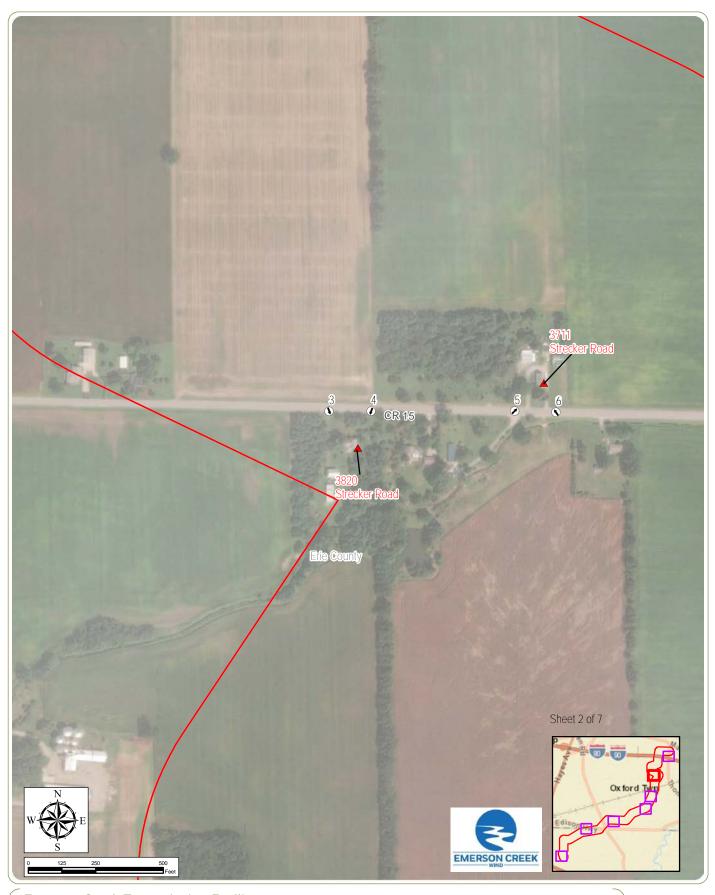


Figure 7: Historic Resources Survey Results and Photo Locations - Sheets

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility
- Resource No Longer Extant X
- Photograph Location







Figure 7: Historic Resources Survey Results and Photo Locations - Sheets

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility
- × Resource No Longer Extant
- Photograph Location







Figure 7: Historic Resources Survey Results and Photo Locations - Sheets

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility
- X Resource No Longer Extant
- Photograph Location





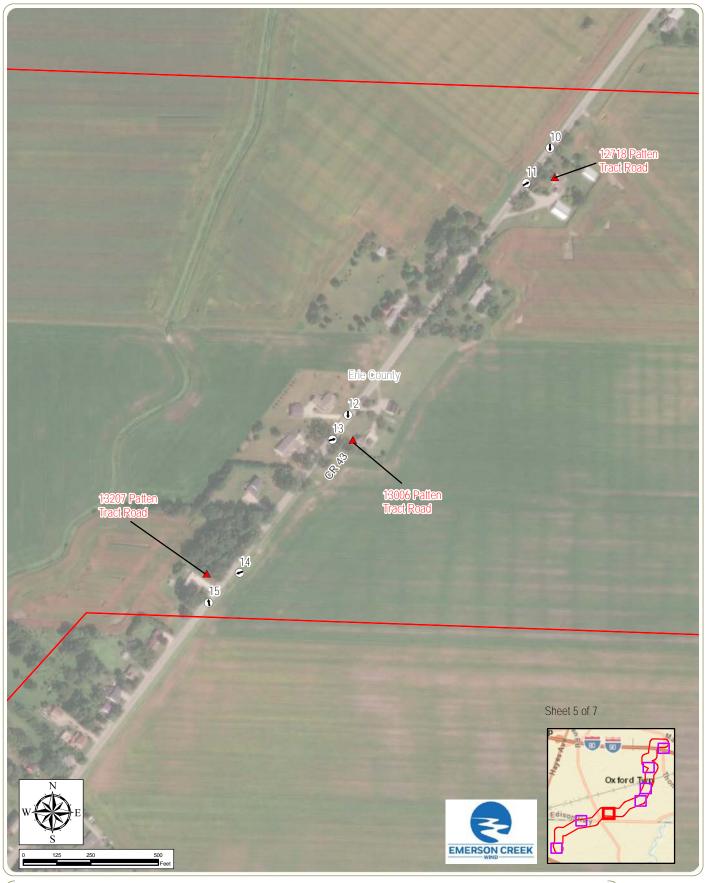


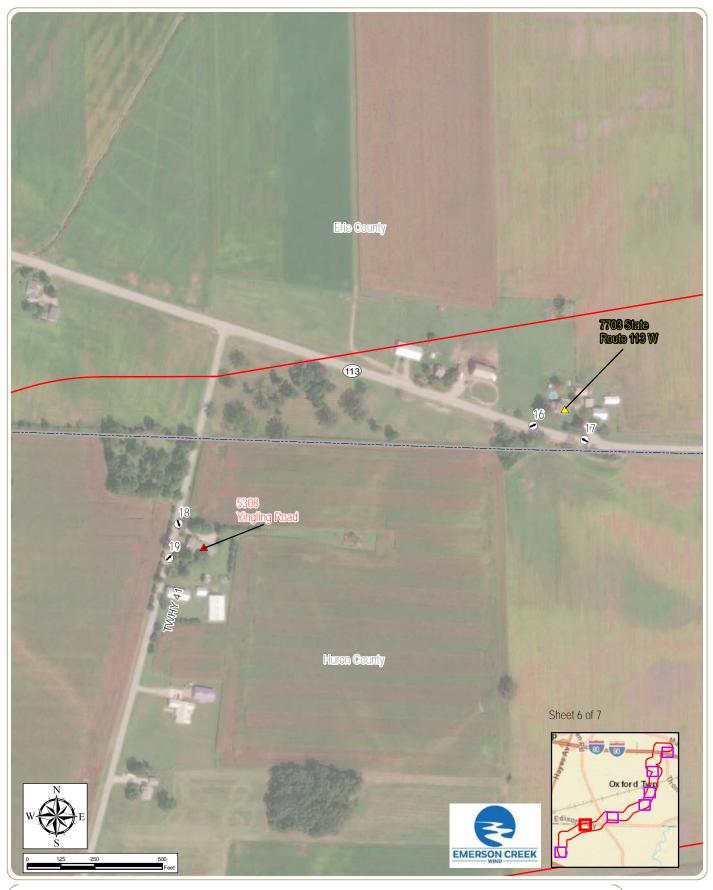
Figure 7: Historic Resources Survey Results and Photo Locations - Sheets

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility
- X Resource No Longer Extant
- Photograph Location







Elle allu Huloli Coulliles, Ollio Figuro 7: Historic Dosourcos Sur

Figure 7: Historic Resources Survey Results and Photo Locations - Sheets

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on May 13, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- △ Satisfies NRHP eligibility criteria
- ▲ Does not satisfy NRHP-eligibility criteria
- X Resource No Longer Extant
- Photograph Location





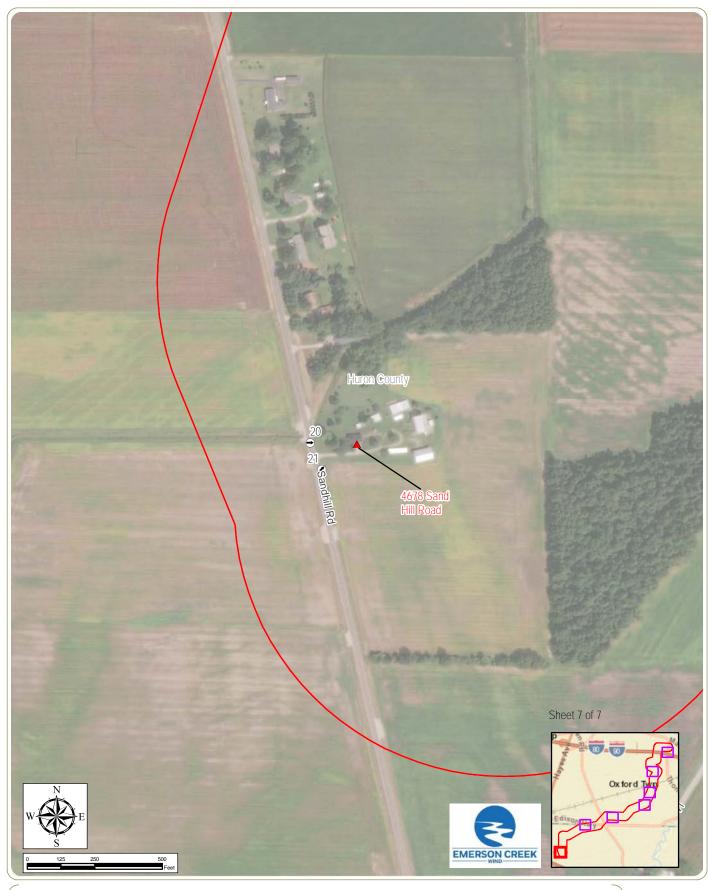


Figure 7: Historic Resources Survey Results and Photo Locations - Sheets $\,$

Notes: 1. Basemap: ESRI ArcGIS Online "World Imagery" map service. 2. This map was generated in ArcMap on April 16, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- △ Satisfies NRHP eligibility criteria
- Does not satisfy NRHP eligibility criteria
- X Resource No Longer Extant
- Photograph Location





Appendix A.
OHPO Correspondence



December 30, 2019

Maura Johnson The Mannik & Smith Group, Inc. 1800 Indian Wood Circle Maumee, OH 43537

RE:

Emerson Creek Wind Project, Erie and Huron Counties, Ohio (OPSB Case #18-1607-EL-BGN)

(2019-HUR-43954)

Republic Wind Project, Sandusky and Seneca Counties, Ohio (OPSB Case #17-2295-EL-BGN)

(2019-SAN-17201)

Dear Ms. Johnson:

This letter is in response to the correspondence received on December 5, 2019, regarding the above referenced projects. 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). 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 (16 U.S.C.470 [36 CFR 800]).

Our office was provided the *Historic/Architectural Survey Plan, Emerson Creek Wind Project, Erie and Huron Counties, Ohio (Ohio Power Siting Board Case #18-1607-EL-BGN) and Republic Wind Project, Sandusky and Seneca Counties, Ohio (OPSB Case #17-2295-EL-BGN)* (The Mannik & Smith Group, Inc. 2019) for review and comment. Our office accepts the proposed survey plan for historic and architectural resources.

We look forward to continued coordination with APEX Clean Energy and The Mannik & Smith Group, Inc. regarding the Emerson Creek Wind Project. If you have any questions, please contact me at (614) 298-2022, or by e-mail at kkoehlinger@ohiohistory.org or Krista Horrocks at khorrocks@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Kristen Koehlinger, Project Reviews Manager

Resource Protection and Review

Cc: Jennie Geiger, APEX Clean Energy (jennie.geiger@apexcleanenergy.com)

Nate Pedder, APEX Clean Energy (nate.pedder@apexcleanenergy.com)

RPR Serial No: 1081798 & 1082063

Appendix B.

Documentation Table and Photographs



Photograph Number 1 Address: 9211 Thomas Road, Erie County, Ohio

OHI ID Number: ERI0241106

Description: A two-story vernacular residence with associated wood shed and storage barn. View to the south toward the property.

Date of Construction: 1880

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 2 Address: 9211 Thomas Road, Erie County, Ohio

OHI ID Number: ERI0241106

Description: View to the north toward the property.

Date of Construction: 1880

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 1 of 11





Photograph Number 3 Address: 3820 Strecker Road, Erie County, Ohio

OHI ID Number: ERI0224806

Description: A two-story vernacular residence. View to the south-southeast toward the property.

Date of Construction: 1910

Photograph Date: Friday, March 13, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 4 Address: 3820 Strecker Road, Erie County, Ohio

OHI ID Number: ERI0224806

Description: View to the south-southwest toward the property.

Date of Construction: 1910

Photograph Date: Friday, March 13, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 2 of 11





Photograph Number 5 Address: 3711 Strecker Road, Erie County, Ohio

OHI ID Number: ERI0224906

Description: A one-andone-half-story vernacular residence with separate, detached two- and threecar garages. View to the northeast toward the property.

Date of Construction: 1910

Photograph Date: Friday, March 13, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 6 Address: 3711 Strecker Road, Erie County, Ohio

OHI ID Number: ERI0224906

Description: View to the northwest toward the property.

Date of Construction: 1910

Photograph Date: Friday, March 13, 2020

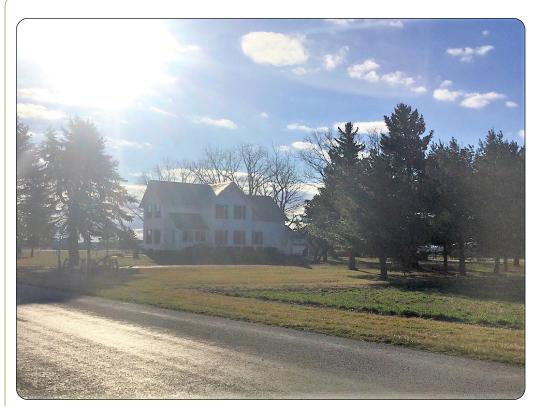
Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 3 of 11





Photograph Number 7 Address: 4102 Higbee Road, Erie County, Ohio

OHI ID Number: ERI0215406

Description: A two-story residence with an associated wood hay barn. View to the east-southeast toward the property.

Date of Construction: 1902

Photograph Date: Friday, March 13, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 8 Address: 4102 Higbee Road, Erie County, Ohio

OHI ID Number: ERI0215406

Description: View to the south-southwest toward the property.

Date of Construction: 1902

Photograph Date: Friday, March 13, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 4 of 11





Photograph Number 9 Address: 11911 Ransom Road, Erie County, Ohio

OHI ID Number: ERI0222006

Description: View to the east toward the lot.

Date of Construction: N/A

Photograph Date: Friday, March 13, 2020

Appears to Satisfy NRHP Eligibility Criteria: Resource No Longer Extant



Photograph Number 10 Address: 12718 Patten Tract Road, Erie County, Ohio

OHI ID Number: ERI0220406

Description: A one-and-onehalf-story residence with an attached one-car garage. View to the south toward the property.

Date of Construction: 1880

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 5 of 11





Photograph Number 11 Address: 12718 Patten Tract

Road, Erie County, Ohio

OHI ID Number: ERI0220406

Description: View to the north-northeast toward the property.

Date of Construction: 1880

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 12

Address: 13006 Patten Tract Road, Huron County, Ohio

OHI ID Number: ERI0220506

Description: A two-story residence with an attached one-car garage. View to the south toward the property.

Date of Construction: 1898

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 6 of 11





Photograph Number 13 Address: 13006 Patten Tract Road, Huron County, Ohio

OHI ID Number: ERI0220506

Description: View to the east-northeast toward the property.

Date of Construction: 1898

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 14 Address: 13207 Patten Tract Road, Erie County, Ohio

OHI ID Number: ERI0220606

Description: A one-andone-half-story vernacular residence. View to the west-southwest toward the property.

Date of Construction: 1910

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 7 of 11





Photograph Number 15 Address: 13207 Patten Tract Road, Erie County, Ohio

OHI ID Number: ERI0220606

Description: View to the north-northwest toward the property.

Date of Construction: 1910

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 16 Address: 7703 State Route 113 W, Erie County, Ohio

OHI ID Number: ERI0222606

Description: A two-story brick Greek Revival-style residence and associated wood hay barn. View to the east-northeast toward the residence and barn.

Date of Construction: 1841

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: Yes (Criterion C)

Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 8 of 11





Photograph Number 17 Address: 7703 State Route 113 W, Erie County, Ohio

OHI ID Number: ERI0222606

Description: View to the west-northwest toward the residence.

Date of Construction: 1841

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: Yes (Criterion C)



Photograph Number 18 Address: 5308 Yingling Road, Huron County, Ohio

OHI ID Number: N/A

Description: A two-story vernacular residence. View the to south-southeast toward the property.

Date of Construction: 1807

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 9 of 11





Photograph Number 19 Address: 5308 Yingling Road, Huron County, Ohio

OHI ID Number: N/A

Description: View to the northeast toward the property.

Date of Construction: 1807

Photograph Date: Wednesday, March 11, 2020

Appears to Satisfy NRHP Eligibility Criteria: No



Photograph Number 20 Address: 4678 Sand Hill Road, Huron County, Ohio

OHI ID Number: N/A

Description: View to the east toward the property.

Date of Construction: c. 1940

Photograph Date: Monday, January 27, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Emerson Creek Transmission Facility

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 10 of 11





Photograph Number 21 Address: 4678 Sand Hill Road, Huron County, Ohio

OHI ID Number: N/A

Description: A one-and-onehalf-story residence. View to the northwest toward the property.

Date of Construction: c. 1940

Photograph Date: Monday, January 27, 2020

Appears to Satisfy NRHP Eligibility Criteria: No

Erie and Huron Counties, Ohio

Appendix B: Historic Resources Survey Photographs

Sheet 11 of 11



Appendix C

OHI I-Form

800 E. 17th Avenue Columbus, OH 43211 614/298-2000

OHIO HISTORIC INVENTORY

Draft Form - Not Reviewed by OHPO

Section 106/RPR Review:

RPR Number:

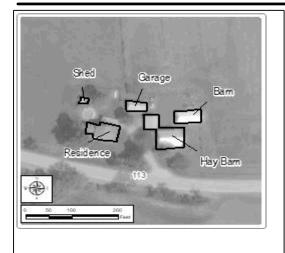
1. No. ERI0222606 RLD 4. Prese	ent Name(s): Katherine Winslow			
2. County: Erie 5. Histo	ric or Other Name(s): Jennison-Hoyt			
6. Specific Address or Location: 7703 SR 113 W	19a. Design Sources: Unknown	35. Plan Shape: Other	2. Co	
	20. Contractor or Builder: Unknown	36. Changes associated with 17/17b Dates:	County: Erie	
6a. Lot, Section or VMD Number: 23-5-45, Lot 31 W	21. Building Type or Plan: Upright and Wing	17. Original/Most significant construction 17b. 37. Window Type(s): 6 over 6 Other 38. Building Dimensions: 49' x 64'		
7. City or Village: Oxford (Township of)	22. Original Use, if apparent: Single Dwelling			
9. U.T.M. Reference Quadrangle Name: Kimball	23. Present Use: Single Dwelling			
Zone: 17 Easting: 354197 Northing: 4	24. Ownership.	39. Endangered? YES By What?	4. Present or Historic Name(s):	
10. Classification: Building 11. On National Register? NO	25. Owner's Name & Address, if known: Travis Lowe 7703 State Route 113 West Oxford (Township of)	40. Chimney Placement: No chimney observe		
13. Part of Established Hist. Dist? NO	26. Property Acreage: 3.84		s):	
15. Other Designation (NR or Local)	27. Other Surveys:	41. Distance from & Frontage on Road: 68 feet; 350 feet	Katherine Winslow	
	28. No. of Stories: Two story	51. Condition of Property: Good/Fair	ne W	
16. Thematic Associations: General Mixed Farm	29. Basement? Yes 30. Foundation Material: Ashlar Stone, w/no water table	52. Historic Outbuildings & Dependencies Structure Type(s): English or Three Bay Barn	inslow	
17. Date(s) or Period: 17b. Alteration Date 1870 17b. Style Class and Design:	(s): 31. Wall Construction: Unknown	Other Outbuilding/Structure/Feature Date(s):		
Dominant Greek Revival Element Federal 18a. Style of Addition or Elements(s):	32. Roof Type: Gable Roof Material: Asphalt shingle	unknown unknown Associated Activity: Unknown Addition		
	33. No. of Bays: 3 Side Bays: 2	53. Affiliated Inventory Number(s): Historic (OHI):		
19. Architect or Engineer: Unknown	34. Exterior Wall Material(s): Brick	Archaeological (OAI):		



8. Site Plan (location map) with North Arrow



- 1. No. ERI0222606 4. Present Name(s): Katherine Winslow
- 2. County Erie
- 5. Historic or Other Name(s): Jennison-Hoyt





Door Selection: Single off center Door Position: Recessed Orientation: Gable end axis

Symmetry: Multiple symmetrical arrangement

Report Associated With Project:

Primary Author	Secondary Author(s)	Year	Title
Arena, Susan	Andrew, Roblee; Johnson, Grant; Heaton, Patrick	2020	Historic Resources Survey, Emerson Creek Transmission Facility

42. Further Description of Important Interior and Exterior Features

7703 State Route 113 West is a historic farmstead consisting of a brick, Greek Revival-style influenced residence, a one-story wood bay barn, a one-story cement block barn, a metal three-car garage, and a one-story wood garage/carriage house. The farmstead is situated in an agricultural setting on a secondary state transportation route. The house is composed of a two-story, three-bay, front gable principal block flanked by one-story, side-gable wings. The house features partial cornice returns, stone windowsills and lintels, and a sunburst fan detail in the gable.

43. History and Significance

7703 State Route 113 West is an historic farmstead consisting of a Greek Revival-style residence and four associated agricultural buildings and a small shed. In 1874 and 1896 the property was owned by Lafayette H. Jennison (b.1825, d. 1912), a farmer (Stewart and Page, 1874; Atlas, 1896; US Find a Grave, 2020). The property is significant as an example of Greek Revival-style architecture in rural north-central Ohio.

44. Description of Environment and Outbuildings (See #52)

7703 State Route 113 West is a historic farmstead consisting of a brick, Greek Revival-style influenced residence, a one-story wood bay barn, a one-story cement block barn, a metal three-car garage, and a one-story wood garage/carriage house. The farmstead is situated in an agricultural setting on a secondary state transportation route. Open farm fields encompass the property, with a few neighboring farmsteads and residences nearby. A low hedgerow bounds the east and north property lines. A wood-frame, bank-barn, with sliding doors on the broadside sits closest to the road. Beyond that are a wood-frame shed and two modern, metal barns. The property retains a high degree of integrity of location, materials, design, feeling, and workmanship.

45. Sources of Information

Erie County Auditor's Office (Erie County). 2020. Online mapping service. Available at http://erie.iviewauditor.com/Map.aspx. Stewart and Page. 1874. Combination Atlas Map of Erie County. Stewart and Page. Philadelphia, PA. US Find a Grave. 2020. L.H. Jennison. Retrieved from https://www.findagrave.com/memorial/119610120.

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

12/28/2021 11:41:26 AM

in

Case No(s). 21-1055-EL-BGA

Summary: Response - Part 7 of 7 (Attachment 6) electronically filed by Christine M.T. Pirik on behalf of Firelands Wind, LLC