

May 16, 2022

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

**Re: Supplement to Application – State Historic Preservation Office Architecture
Concurrence Letter & SHPO Archaeological Correspondence
Case No. 21-1231-EL-BGN**

In the Matter of the Application of Fountain Point Solar Energy LLC for a Certificate
of Environmental Compatibility and Public Need to Construct a Solar-Powered
Electric Generation Facility in Logan County, Ohio.

Dear Ms. Troupe:

On April 11, 2022, Fountain Point Solar Energy LLC (“Applicant”) filed an application with the Ohio Power Siting Board for a Certificate of Environmental Compatibility and Public Need to construction a 280-megawatt, solar-powered electric generation facility in Logan County, Ohio (“Application”).

This Supplement to the Application consists of the following:

1. Attachment 1: This attachment contains the concurrence letter from the State Historic Preservation Office (“SHPO”) regarding the Historic Architectural Reconnaissance Survey contained in Application Exhibit P filed April 11, 2022.
2. Attachment 2: This attachment contains correspondence from SHPO regarding the Phase I Archaeological Reconnaissance Survey Report contained in Application Exhibit O filed April 11, 2022.

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)

Matthew C. McDonnell (0090164)

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(Counsel agree to receive service by email.)

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Ms. Tanowa Troupe
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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 16th, day of May, 2022.

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

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4876-7118-3646 [39579-58]

Fountain Point Solar Energy LLC
Case No. 21-1231-EL-BGN
Supplement to Application

Attachment 1
SHPO Concurrence Historic Architectural
Reconnaissance Survey



April 8, 2022

In reply, please refer to:
2021-LOG-52509

Ryan J. Peterson
Cardno, Inc.
10420 Bluegrass Parkway, Suite 10420
Louisville, Kentucky 40220

RE: Historic Architectural Survey for the Fountain Point Solar Energy Project
Logan County, Ohio

Dear Mr. Peterson:

This letter is in response to correspondence received on March 10, 2022. 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 (16 U.S.C.470 [36 CFR 800]).

The proposed project footprint encompasses approximately 3,221 acres. The following review and comments pertain only to the historic architectural resources included in the *Historic Architectural Reconnaissance Survey for the Fountain Point Solar Energy Project in Bokes Creek, Rush Creek, and Perry Townships, Logan County, Ohio* by Cardno, Inc. (2021). The archaeological component has been reviewed under a separate cover.

A total of 9 cemeteries and 268 extant architectural resources were identified during the field survey. Eleven of these properties are recommended eligible for listing in the National Register of Historic Places. The remaining 257 architectural resources and cemeteries are recommended as not eligible for NRHP listing. Our office agrees with these recommendations of eligibility.

While a few of the eligible resources in West Mansfield that may have minimal visibility of the project, existing buildings and vegetation limit the potential of effects from the project. No further coordination regarding above ground resources is necessary, unless the project changes.

If you have any questions, please do not hesitate to contact me at jwilliams@ohiohistory.org.
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: 1092453

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Fountain Point Solar Energy LLC
Case No. 21-1231-EL-BGN
Supplement to Application

Attachment 2

SHPO Correspondence Phase I Archaeological



In replies, please use
2021-LOG-52509

April 11, 2022

Ryan Peterson
Cardno, Inc.
3901 Industrial Boulevard
Indianapolis, IN 46254

Dear Mr. Peterson:

RE: Fountain Point Solar Energy Project, Logan County, Ohio

This is in response to the receipt, on March 10, 2022, of the submission related to the Fountain Point Solar Energy Project in Bokes Creek, Rush Creek, and Perry Townships, Logan County, Ohio. The report was submitted by Cardno, Inc.(Cardno), now Stantec on behalf of Fountain Point Solar Energy, LLC (Fountain Point). 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 4906-5). 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 following comments pertain to the *Phase I Archaeological Reconnaissance for the Fountain Point Solar Energy Project, Bokes Creek, Rush Creek, and Perry Townships, Logan County, Ohio* (Cardno: Settle et al. 2022) submitted to the SHPO office for review.

The project involves the proposed development of an up to 280 megawatt (MW) solar energy project consisting of ground mounted photovoltaic arrays and associated infrastructure. The project area (PA) measures approximately 1,374 hectares (ha) (3,396 acres [ac]) and consists of agricultural fields, fallow grasslands, portions of residential and farmstead parcels, and remnant woodlots. Only a portion of the Project Area was able to be investigated for cultural resources during the field effort, the remainder of the Project Area is planned for survey in the Spring of 2022. The results of these planned investigations will be presented in a forthcoming addendum submission.

The report details the Phase I survey methods, which included surface collection of agricultural field, visual inspection and shovel test pit excavations in area where surface visibility was not conducive to surface collection. A detailed literature review and examination of historic cartographic resources were conducted for the proposed project. In addition, a comprehensive review of land ownership was completed for all post contact sites that were identified as a result of the Phase I survey.

As a result of the archaeological survey, 161 previously undocumented sites were identified (33LO668-33LO828). Eighty-nine (89) sites are identified as isolated finds; fifty-one (51) are described as unassigned low density prehistoric scatters; eight post contact artifact scatters; and seven multicomponent sites.



Cardno recommends that these 155 sites are not eligible for inclusion in the National Register of Historic Places. These sites are not likely to yield additional information about Ohio prehistory in the region or the historical development of this area. SHPO concurs with this recommendation. Cardo, now Stantac recommends the following actions be taken:

- 33LO773, 33LO791, and 33LO800, precontact artifact scatters, are recommended for further archaeological work or avoidance by Project activities.
- The precontact component of one multicomponent scatter, 33LO793, is recommended for further archaeological work or avoidance by Project activities.
- The post-contact component of one multicomponent scatter, 33LO772, is recommended for further archaeological work or avoidance by Project activities.
- One post-contact artifact scatter, 33LO806, is recommended for additional Phase Ia work during the second installment of fieldwork during Spring 2022.

Base on the artifacts recovered (diagnostic materials and the size of the assemblage at each site), the SHPO office agrees that avoidance or further work is recommended for 33LO773, 33LO791, and 33LO800; the precontact component of 33LO0793; and the post contact component of 33LO772. The sites have the potential to yield additional information that can contribute to the history of Ohio prehistory and history of Logan County.

If avoidance of these sites is not feasible, then Phase II work plan including research design, should be developed for each site and submitted to our office prior to the commencement of field work. The SHPO recommends that the Phase II work include, if possible, a geophysical survey (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 feature) 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 are warranted at the site. If not, then a short 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.

If any of the site are to be avoided, then 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 the sites. The avoidance plan should include a minimum 50-ft buffer around the established site boundary to ensure that no incidental impacts occur during construction. The buffer should be clearly marked in the field (e.g., silt fence) to help minimize the impacts.

The SHPO office has reviewed the report that was recently submitted, that presents the results of the fieldwork to date. Our office will wait for the remaining fieldwork to be completed and the appendix to be submitted for review prior to issuing our final comments.

If you have any questions, please contact me by email at dgagliano@ohiohistory.org. Thank you for your cooperation.



Sincerely,

A handwritten signature in black ink that reads "Dawn Walter Gagliano".

Dawn Walter Gagliano, Project Reviews Manager
Resource Protection and Review

Ser. No. 1092457

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

5/16/2022 2:22:40 PM

in

Case No(s). 21-1231-EL-BGN

Summary: Notice - Supplement to Application – State Historic Preservation Office
Architecture Concurrence Letter & SHPO Archaeological Correspondence
electronically filed by Christine M.T. Pirik on behalf of Fountain Point Solar Energy
LLC