

May 23, 2022

Ohio Power Siting Board  
180 E. Broad St.  
Columbus, Ohio 43215



Re. Case Number 21-0868-EL-BGN: Scioto Farms Solar

Heartland Earthworks Conservancy

<https://www.facebook.com/HeartlandEarthworksConservancy>, a nonprofit organization registered with the state of Ohio specializing in the identification and conservation of American Indian earthworks, believes the archaeological investigations conducted for this project are deficient and urges the Board to not grant the certificate of environmental compatibility and public need until the following deficiencies are adequately addressed.

We have reviewed the interim report for the Phase 1 Archaeology Survey prepared by Commonwealth Heritage Group. We note the earthwork in the project area known as Evans Fort, 33PI10, was not identified during the field investigation. We believe it was not identified because no effort was made to identify it using methods capable of doing so. In order to identify earthworks whose above ground features have been erased because of centuries of plowing, geophysical survey methods must be used. Geophysical survey is standard procedure for identifying such landmarks. We note the work plan approved by State Historic Preservation Office (SHPO) for the archaeological survey required only surface collection and the excavation of shovel test pits. These methods are often incapable of identifying important (i.e., landmarks eligible for the National Register of Historic Places [NRHP]) archaeological features buried just below the ground surface.

A portion of the scoping letter from SHPO to Commonwealth states, in part:

“A check of our records shows that the project area has not been surveyed. A number of sites have been identified near the project area, including...an historic fort (33PK10) [sic]. These properties all located to the east of the project area, along SR104 and the Scioto River. The work plan indicates that these archaeologically sensitive areas are in wooded areas and will be avoided during construction, with the use of fencing to delineate the construction areas. SHPO requests that a construction avoidance plan be submitted to our office for review prior to construction. Should the construction limits change and the potential for known historic resources to be affected, we request that a modified work plan be submitted to our office for review and comment.”

We reply that 33PK10 (sic) does not appear to be “an historic (era) fort”. Like other earthworks in the area, it appears to be prehistoric/precontact in age, approximately 2,000 years old. Further, it is not “east of the project area”, nor is it in “wooded areas” that “will be avoided during construction”. It appears to be within the project area, specifically in archaeological survey areas

4, 5, and 7 (see below). Areas 4 and 5 are designed to contain the solar arrays and related infrastructure that will likely adversely impact the earthwork.

On page 30, Commonwealth's literature review states:

“One previously recorded earthwork attributed to the Middle Woodland Hopewell culture partially overlaps the project footprint: site 33PI10 (the Kreisel-Simkins Fort). The site is charted as overlapping the eastern part of survey area 5 and the northern part of survey area 7, and extends north of survey area 7. The earthwork appears in Squier and Davis (1848:35, Plate XII, no. 4) where it is depicted as a 15.5-ac (6.3-ha), semi-circular, earthen wall four feet (1.2 m) in height with a corresponding 4-foot (1.2-m) deep ditch and an opening on the northwest side. The earthwork is also depicted in Mills (Mills 1914) (see Figure 11). According to the OAI form for this site, it was originally surveyed in 1847 by P. N. White and consists of a single earthen wall running from “ravine N. of school, W. in arc across 104, thru woods & back across 104 to next deep ravine to N.” If mapped in the correct location in the OHPO OMS, there is no surficial evidence of 33PI10 within the project footprint and the earthwork does not show up on LiDAR. At the time of field survey in December 2021 residential construction was occurring in the northern mapped part of 33PI10, which falls outside the project area.”

As previously stated, Commonwealth made no effort in the field to identify this likely NRHP eligible landmark despite the fact that SHPO has it recorded on their Online Mapping System in the project area. Because its “surficial evidence” has been erased by plowing, geophysical instruments must be used to identify it. We have indicated its location on the below color infrared aerial photograph.

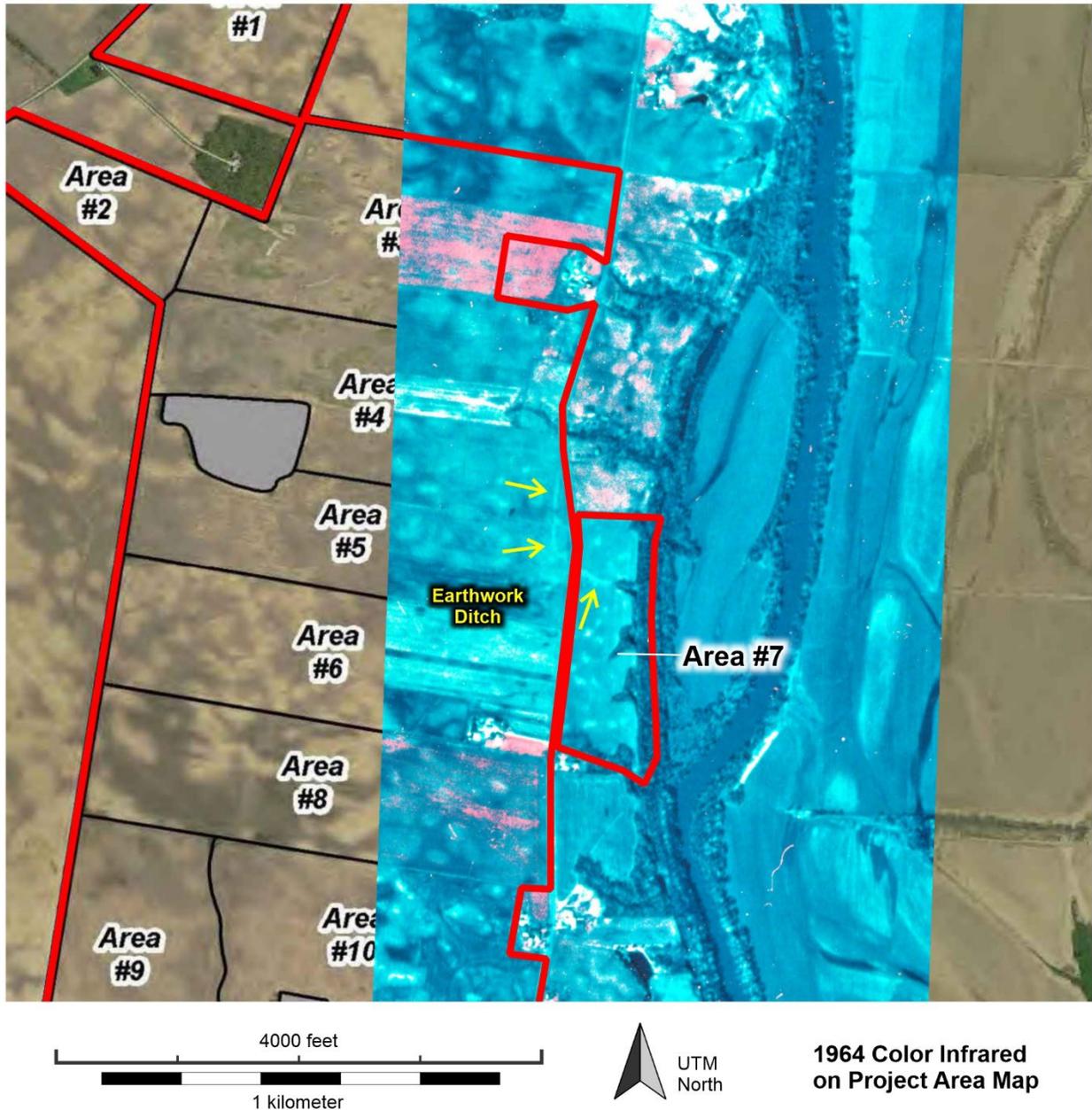
On page 4, Commonwealth's summary states, in part, “There was no surface evidence of the one previously mapped site in the project footprint (33PI10). Commonwealth recommends that no additional archaeological testing in the surveyed portion of the project footprint is necessary to meet compliance with requirements for Certificate Applications for Electric Generating Facilities as detailed in Ohio Administrative Code 4906-04 and as administered by the Ohio Power Siting Board (OPSB).”

We reply that based on the preliminary project design map, 33PI10 will be impacted by construction of access roads, fencing, inverter pads, solar arrays, and vegetative screening. We recommend additional archaeological investigation in the form of geophysical survey to identify 33PI10 in order to comply with the Board's rules.

In conclusion, although we have specifically addressed concerns about the efficacy of the archaeological survey pertaining to the earthwork in the project area known as Evans Fort, 33PI10, our concerns are much broader. Best (modern) practices in archaeological investigations using geophysical survey methods were not used to identify archaeological resources (landmarks) eligible for the NRHP anywhere on this project. Thus, none were found. The same is true for most if not all projects coordinated through the SHPO for certificates of environmental

compatibility and public need by the OPSB. We strongly urge the Board, SHPO, applicants for Board approvals, and the archaeologists employed in these endeavors to adopt best practices for archaeological survey by conducting geophysical survey where practicable and necessary to identify NRHP eligible archaeological resources.

Al Tonetti  
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Heartland Earthworks Conservancy



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Summary: Public Comment of Al Tonetti, via website, electronically filed by  
Docketing Staff on behalf of Docketing