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September 8, 2022

Via Electronic Filing

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

Re: Scioto Farms Solar Project, LLC, Case No. 21-0868-EL-BGN

Dear Ms. Troupe:

On December 13, 2021, Scioto Farms Solar Project, LLC ("Scioto Farms") filed an application for a Certificate of Environmental Compatibility and Public Need to develop, construct, an up to 110 megawatt solar-powered electric generating facility in Wayne Township, Pickaway County, Ohio.

Attached for filing in the above-referenced case is a copy of the September 2, 2022 Ohio State Historic Preservation Office's ("SHPO") letter in response to Scioto Farm's *Phase I Archaeology Survey of the Scioto Farms Solar Project, Wayne Township, Pickaway County, Ohio: Final Report*. SHPO concurs that the geophysical surveys to the MOU should be deferred.

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

Sincerely,

Sommer L. Sheely

Attachment

Cc: Thomas Crawford (w/Attachment)
Jonathan Pawley (w/Attachment)



In replies, please use
2021-PIC-51994

September 2, 2022

Anne B. Lee
Commonwealth Heritage Group
4608 Indianola Avenue, Suite C
Columbus, Ohio 43214

RE: Scioto Farms Solar Project, Wayne Township, Pickaway County, Ohio

Dear Ms. Lee:

This is in response to the receipt of the submission, on August 5, 2022, related to the Scioto Farms Solar Project, Wayne Township, Pickaway County, Ohio. Commonwealth Heritage Group, Inc. (Commonwealth) on behalf of Scioto Farms Solar Project, LLC (Scioto Farms Solar), submitted the report. 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 Archaeology Survey of the Scioto Farms Solar Project, Wayne Township, Pickaway County, Ohio: Final Report* (Commonwealth: Lee and Lawrence 2022) submitted to the SHPO office for review.

The project involves the proposed development and installation of solar arrays and associated infrastructure, such as inverters, collection lines, a switchyard and substation, access roads, and construction logistic areas, on contiguous parcels on the west side of the Scioto River, in Wayne Township, Pickaway County, Ohio.

The project area (PA) measures approximately is 1,070 acres (433 ha) and the project footprint, as delineated by the project fence line, is 744 acres (301 ha) and consists of agricultural fields, fallow grasslands, portions of residential and farmstead parcels, and remnant woodlots. A total of 852.8 acres (345.1 ha) or 89.5% of the total project footprint was surveyed during 2021. As a result of the initial archaeological survey, 44 previously undocumented sites were identified (33PI1768-33PI1811). Commonwealth recommended that these 44 newly identified sites are not eligible for inclusion in the National Register of Historic Places. The SHPO office concurred with this recommendation in a letter date April 29, 2022. An additional 953 acres (385.7 ha) were surveyed in July 2022, which accounts for the project area minus four wooded tracts (117 ac [ha]) excluded from the project footprint. One additional site, 33PI1816, unassigned isolated lithic artifacts was identified and determined to be not eligible.



A review of historic cartographic resources and the SHPO GIS database indicated that two previously recorded sites are within the project area: 33PI10, a prehistoric earthwork, and 33PI22, a prehistoric mound.

- Site 33PI22 is in a wood lot outside the project footprint and therefore will be avoided by project activities.
- The western portion of site 33PI10 is mapped as overlapping the eastern edge of the project footprint.

Commonwealth recommends that a geophysical survey (with ground truthing) be completed to determine whether the earthwork has a subsurface signature inside the project footprint. Although surficial evidence of this site was not identified during survey or on LiDAR imagery, subsurface remains may still be present. If subsurface remnants of the earthwork are identified, it is recommended that placement of the fence line be adjusted to avoid these subsurface remains and that protective fencing be put up around the remnants to prevent damage during construction and operation. The geophysical investigations of the mapped earthwork location will be completed after the 2022 autumn harvest with a report to follow shortly thereafter. The geophysical investigation of 33PI10 will be a stipulation of the Memorandum of Understanding (MOU) under development for this project.

Based on the information provided to the SHPO office for review related to the Scioto Farms Solar Project in Pickaway County, the SHPO office agrees with the findings presented by Commonwealth. A good faith effort was made to identify National Register-eligible archaeological resources within the project area. Commonwealth recommends that the project will have no impact on newly recorded archaeological sites eligible for or listed in the NRHP. The SHPO office concurs with this recommendation. Additionally, it is recommended that additional investigation is required for only the portion of 33PI10 within the project footprint in order to comply with requirements of the OPSB. The SHPO office agrees with this recommendation.

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, reading "Dawn Walter Gagliano".

Dawn Walter Gagliano, Project Reviews Manager
Resource Protection and Review

RPR Ser. No. 1094425

**This foregoing document was electronically filed with the Public Utilities
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in

Case No(s). 21-0868-EL-BGN

Summary: Notice of SHPO Concurrence electronically filed by Teresa Orahood on
behalf of Sommer Sheely