

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Richwood Solar,)
LLC for a Certificate of Environmental)
Compatibility and Public Need to Construct a Solar-) Case No. 23-930-EL-BGN
Powered Electric Generation Facility in Union)
County, Ohio.)

DIRECT TESTIMONY OF

**Douglas J. Pippin, PhD, RPA
Archaeology Services Leader
Environmental Design & Research, Landscape Architecture, Engineering &
Environmental Services, D.P.C.**

**on behalf of
Richwood Solar, LLC**

July 12, 2024

/s/ Christine M.T. Pirik
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(Counsel of Record)
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Attorneys for Richwood Solar, LLC

1 **1. Please state your name, current title, and business address.**

2 My name is Douglas J. Pippin. I am the Archaeology Services Leader at Environmental
3 Design & Research, Landscape Architecture, Engineering & Environmental Services,
4 D.P.C. (“EDR”). My business address is 274 North Goodman Street, Suite B260,
5 Rochester, New York 14607.

6
7 **2. Please summarize your educational background and professional experience.**

8 I received both a Master of Arts and a Doctorate in Anthropology from the Maxwell School
9 of Citizenship and Public Affairs at Syracuse University. I was an anthropology professor
10 for the State University of New York (“SUNY”) for over 20 years. In addition to teaching,
11 I directed cultural resources consultation on behalf of SUNY with Indigenous Nations, as
12 well as state and federal agencies. I joined EDR in 2018 as a Project Manager and was
13 promoted to Senior Project Manager in 2021. I was promoted to Archaeology Services
14 Leader in 2023. I have overseen more than 150 cultural resources surveys for various
15 projects in Ohio, New York, Pennsylvania, Illinois, New Jersey, and Connecticut. The
16 majority of these projects are within the renewable energy sector.

17
18 A copy of my resume is attached to my testimony as Attachment DP-1.

19
20 **3. On whose behalf are you offering testimony?**

21 I am testifying on behalf of Richwood Solar, LLC (“Applicant” or “Richwood”), which is
22 seeking to develop the proposed Richwood facility (“Project”) in Union County, Ohio.

23
24 **4. What is the purpose of your testimony?**

25 The purpose of my testimony is to provide additional context and support for the following
26 exhibits that were filed as part of the Application for a Certificate of Environmental
27 Compatibility and Public Need (“Certificate”) filed with the Ohio Power Siting Board
28 (“Board”) by Richwood in Case No. 23-930-EL-BGN on January 23, 2024, as
29 supplemented by responses to data requests that were received from the Board’s Staff and
30 filed in the docket (“Application”):

31

- 1 • Exhibit R – Research Design and Survey Methodology Report
- 2 • Exhibit S – State Historical Preservation Office (“SHPO”) Correspondence
- 3 • Exhibit U – SHPO Concurrence Archaeological Survey
- 4 • Exhibit V – Phase I Archaeological Survey

5
6 My testimony, together with the other witnesses testifying for Richwood in this case,
7 supports the Board’s approval of Richwood’s Application and the Joint Stipulation and
8 Recommendation filed in this case on July 12, 2024 (“Stipulation”), and the issuance of a
9 Certificate to Richwood authorizing it to construct and operate the Project.

10

11 **5. Please describe the history of your involvement with the Richwood Project.**

12 EDR was retained to conduct a desktop cultural resources survey for the Project in April,
13 2021. We were contracted for the Phase I archaeological fieldwork in July 2022. As the
14 Archaeology Services Leader for EDR, I was responsible for designing and leading the
15 implementation of the desktop research and field archaeological survey for the Project.

16

17 **6. Have you reviewed the Certificate conditions recommended in the Stipulation that**
18 **mirror the conditions recommended in the Staff Report of Investigation filed in this**
19 **docket on June 10, 2024 (“Staff Report”), which are found on pages 53-66 of the Staff**
20 **Report?**

21 Yes, I have.

22

23 **7. Are you aware that Richwood has committed to comply with the conditions agreed to**
24 **in the Stipulation?**

25 Yes, I am.

26

27 **8. Please explain the Research Design and Survey Methodology Report contained in**
28 **Exhibit R to the Application.**

29 EDR completed a Research Design and Survey Methodology Report for the Project. The
30 information and recommendations included in this report are intended to assist the SHPO
31 with its review of the Project for the Board. Specifically, this Research Design and Survey

1 Methodology report has been prepared to satisfy portions of Ohio Administrative Code
2 (“O.A.C.”) Section 4906-04-08(D) of the. This report includes a records review of maps
3 and documents that are “registered landmarks of historic, religious, archeological...or
4 other cultural significance,” i.e., those “districts, sites, buildings, structures, and objects
5 that are recognized by, registered with, or identified as eligible for registration by...the
6 state historical preservation office” located within the Project Area and surrounding 2-mile
7 radius (Historic Resources Study Area) that could potentially be affected by the
8 construction and/or operation of the Project. The report also contains a proposed
9 methodology for the Phase I archaeological field survey. The Research Design and Survey
10 Methodology report was prepared by professionals who meet the Secretary of the Interior’s
11 Guidelines for Professional Qualifications (per 36 CFR, Part 61) in their respective fields.
12

13 **9. Please summarize the findings of the Phase I Archaeology Survey Exhibit V to the**
14 **Application.**

15 The purpose of a Phase I Archaeological Survey is to determine whether archaeological
16 sites are located within areas that could be impacted by the Project. The Phase I
17 archaeological survey was completed in accordance with the proposed Phase I
18 archaeological survey methodology submitted to the SHPO in the Research Design and
19 Survey Methodology Report. Fieldwork described in this report occurred from October to
20 November 2022, March 2023, and May to June 2023. The Phase I archaeological survey
21 was conducted throughout the area of potential effects (“APE”) located in Claibourne,
22 Leesburg, and Taylor Townships, Union County, Ohio. The total archaeological survey
23 involved the excavation of 407 shovel tests in approximately 25 acres, and pedestrian
24 survey of approximately 1,397 acres. In total, 1,495 acres were subjected to Phase I
25 archaeological survey. In total, 95 indigenous artifacts and 62 historic-period artifacts were
26 collected during the survey. The archaeological survey resulted in the identification of 10
27 archaeological sites and 64 isolated finds. Two out of the 10 sites were determined to be
28 potentially eligible for the National Register of Historic Places (“NRHP”) and were
29 recommended for avoidance, or further Phase II archaeological investigations. The
30 Applicant has committed to avoiding these sites.
31

1 **10. Please explain the correspondence received from SHPO in Exhibits S and U.**

2 The Research Design and Survey Methodology for the Project was submitted to SHPO in
3 July 2022. Subsequent concurrence from SHPO was received in August 2022. The Phase
4 I Archaeology Survey Report was submitted to SHPO in December 2023 and concurrence
5 with the recommendations was received in January 2024.
6

7 **11. What direct impact, if any, will the Project have on known NHRP archaeological**
8 **resources, as well as non-eligible resources?**

9 There will be no impact on sites that are deemed to be potentially eligible for inclusion in
10 the National Register of Historic Places. The Applicant has committed to avoiding direct
11 impacts to both of the potentially eligible sites discovered in the Phase I archaeological
12 survey.
13

14 **12. What indirect impact, if any, will the Project have on known archaeological**
15 **resources?**

16 There are no indirect impacts on known archaeological resources for the Project.
17

18 **13. Based upon the archaeological study performed for the Project, is it possible to**
19 **determine the nature of the probable environmental impact of the facility with regard**
20 **to cultural resources?**

21 Yes.
22

23 **14. Based upon the findings in the archaeological study, together with Richwood's**
24 **commitments in the Stipulation, does the facility represent the minimum adverse**
25 **impact on those resources?**

26 Yes.
27

28 **15. Are your opinions and conclusions in your testimony made with a reasonable degree**
29 **of professional certainty?**

30 Yes.
31

1 **16. Does this conclude your testimony?**

2 Yes. However, I reserve the right to update my testimony to respond to any further
3 testimony, reports, and/or evidence submitted in this case.

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 12th day of July, 2024.

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

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Attachment DP-1 Resume



Doug Pippin is the Archaeology Services Leader at EDR. He has over 25 years of professional experience as an archaeologist, both in cultural resources management and as an anthropology professor for the State University of New York. As Archaeology Services Leader, Doug oversees all staff and operations for EDR's archaeology services group. In addition, he manages and/or provides senior technical oversight for Phase I, II, and III archaeological investigations, cultural resources surveys for environmental permitting projects, and development of strategies for the identification, protection, and/or mitigation of archaeological resources. Doug has experience directing compliance efforts for the Native American Graves Protection and Repatriation Act (NAGPRA) and has published numerous peer-reviewed articles. Doug's areas of expertise include historic sites archaeology, State Historic Preservation Office and Tribal Historic Preservation Office consultation, archaeological collections management, and contact-period archaeology in the northeastern United States and Canada

Education

- Doctorate, Anthropology, Maxwell School of Citizenship & Public Affairs, Syracuse University, Syracuse, NY
- Master of Arts, Anthropology, Maxwell School of Citizenship & Public Affairs, Syracuse University, Syracuse, NY
- Bachelor of Science, Photojournalism, University of Maryland

Registration

- Registered Professional Archaeologist #17571

Professional Affiliations

- President, Lewis Henry Morgan Chapter (Rochester), NYS Archaeological Association
- New York Archaeology Council
- Society for Historical Archaeology

Employment History

- Senior Project Manager, Archaeology, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY, 2021-present
- Archaeology Project Manager, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY, 2018-2021

Project Experience

The Riverline project, Erie County, New York. EDR Project Manager for the proposed recreational trail project on a former elevated railway. Overseeing Cultural Resources, Landscape Architecture and Visualization Services.

Alabama Solar Project, Genesee County, New York - Archaeology Services Leader for the Phase I Archaeological Investigations for the proposed solar project. Responsibilities included overall QA/QC for archaeological tasks.

Eastern Cottontail Solar Project, Fairfield County, Ohio - Archaeology Services Leader for the Phase I Archaeological Investigations for the proposed solar project. Responsibilities included overall QA/QC for archaeological tasks.

Stark Solar Project, Stark County, Ohio - Archaeology Services Leader for the Phase I Archaeological Investigations for the proposed solar project. Responsibilities included overall QA/QC for archaeological tasks.

Richwood Solar Project, Union County, Ohio - Archaeology Services Leader for the Phase I Archaeological Investigations for the proposed solar project. Responsibilities included overall QA/QC for archaeological tasks.

Frasier Solar Project, Knox County, Ohio - Archaeology Services Leader for the Phase I Archaeological Investigations for the proposed solar project. Responsibilities included overall QA/QC for archaeological tasks.

Heritage Wind Project, Orleans County, New York - Archaeology Services Leader and Archaeology Project Manager for the proposed wind project. Tasks included fieldwork management and report production.

Crossroads Solar, Morrow County, Ohio - Archaeology Services Leader for the Phase I Archaeological Investigations for the proposed solar project. Responsibilities included overall QA/QC for archaeological tasks.

Sunrise Wind, Onshore Transmission Line, Suffolk County, NY - Archaeology Services Leader and Archaeology Project Manager for a Phase I archaeological survey of the onshore interconnection cable route and substation for a proposed 880-MW offshore wind farm located off the coast of Southern New England. EDR's services were in support of a New York State Public Service Commission Article VII Application.

Reimagine the Canals Initiative, Little Falls Connector, NYS Barge Canal Historic District, Town of Little Falls, Herkimer County, NY - Archaeology Services Leader for

Phase IA archaeological survey for the transportation improvements within the NYS Barge Canal Historic District.

Rochester Genesee Regional Transportation Authority, Regional Transit Service Connection Hubs, Monroe County, NY - Project manager and author of seven archaeological site assessments and SHPO consultation for new RGRTA Connection Hub sites in Monroe County.

Seneca Nation of Indians Transportation Services, Transportation Garage Assessments - Project manager for cultural resources assessment of improvements to Seneca Nation of Indians Transportation Services, Cattaraugus, and Allegany Garage projects.

Willowbrook Solar, Highland and Brown Counties, Ohio - Project manager for Phase IB archaeological survey in support of an OPSB Application for a proposed solar energy project that will be sited on an approximately 2,200-acre area.

Clearview Solar, Champaign County, Ohio - Project manager for Phase IB archaeological survey in support of an OPSB Application for a proposed solar energy project that will be sited on an approximately 1,196-acre area.

Powell Creek Solar, Putnam County, Ohio - Project manager for Phase IB archaeological survey in support of an OPSB Application for a proposed solar energy project that will be sited on an approximately 2,013-acre area.

Prattsburgh Wind Farm, Steuben County, New York - Project manager for Phase IB archaeological survey in support of a 94-C application for a proposed wind farm energy project.

Morris Ridge Solar Energy Center, Livingston County, NY - Project Manager for a Phase I archaeological survey at a proposed 177-MW solar facility. Services provided in support of the New York State Department of Public Service Article 10 Application review.

South Fork Wind, Onshore Transmission Line, Suffolk County, NY - Project Manager for a Phase I archaeological survey of the onshore interconnection cable route for a proposed 132-MW offshore wind farm located off the coast of Southern New England. EDR's services were in support of a New York State Public Service Commission Article VII Application.

Flint Mine Solar, Greene County, NY - Project Manager for a Phase I archaeological survey at a proposed 100-MW solar facility. Services provided in support of the New York State Department of Public Service Article 10 Application review.

Riverhead Solar 2, Suffolk County, NY - Project Manager for a Phase I archaeological survey at a proposed 36-MW solar facility. Co-author of final report, submitted to New York State Historic Preservation Office (SHPO). Services provided in support of the New York State Department of Public Service Article 10 Application review.

Alamo Solar, Preble County, OH - Project Manager for the Phase I archaeological survey and co-author of the archaeological research design, in consultation with the Ohio Historic Preservation Office (OHPO). Services provided in support of an Application to the Ohio Power Siting Board (OPSB) for the proposed 70-MW solar energy project sited on approximately 1,002-acres.

Angelina Solar, Preble County, OH - Project Manager for the Phase I archaeological survey and co-author of the archaeological research design, in consultation with OHPO. Services provided in support of an Application to the OPSB for the proposed 80-MW solar energy project sited on approximately 934-acres.

Coxsackie Correctional Facility, Greene County, NY - Co-authored the Phase III archaeological survey report for a Pre-Contact Native American archaeological site identified and excavated pursuant to Section 14.09 of the New York State Historic Preservation Act and Section 106 of the National Historic Preservation Act. Directed laboratory analysis of approximately 7,000 artifacts.

Hillcrest Solar Project, Brown County, OH - Project Manager for the Phase I archaeological survey at a proposed 125-MW solar energy project sited on approximately 1,400-acres. Cultural resources survey conducted in consultation with the OHPO pursuant to conditions of Certificate approved by the OPSB.

Cassadaga Wind Project, Chautauqua County, NY - Co-authored a Phase II documentary research report for three historic-period sites identified during the previous Phase IB archaeological survey, related to layout changes to a proposed 126-MW wind farm. Services provided in support of the New York State Department of Public Service Article 10 Application review.

Johnson Hall State Historic Site, Fulton County, NY - Project Manager for Phase I archaeological survey at the eighteenth-century colonial mansion of Sir William Johnson. Services were in support of building improvements for drainage around the foundation walls. Co-author of the final report submitted to SHPO.

Lake Road Improvement Project, Monroe County, NY - Project Manager for Phase II archaeological survey in support of a roadway improvement project. Responsible for overseeing the survey in a DOT right-of-way, developing a Phase II investigation strategy, and contributing to the final report for a pre-contact Native American site.

Timber Road IV, Paulding County, OH - Assisted in the revision of the Phase I archaeological survey report for the 100-MW wind farm in the Great black Swamp region.

Village of Mohawk Water Wells, Herkimer County, NY - Assisted in the report for the archaeological monitoring of excavation/construction of water wells within a 1.2-acre parcel being redeveloped with storm-resilient municipal and utility infrastructure. Monitoring was conducted as part of Section 106 of the National Historic Preservation Act consultation for the New York Governor's Office of Storm Recovery (GOSR) and Federal Emergency Management Agency (FEMA).

Project experience prior to joining EDR

Native American Graves Protection and Repatriation Act Compliance Director, State University of New York (SUNY) at Oswego - Coordinated tribal and agency consultation along with federal regulatory compliance for archaeological collections. Managed a collection of over 150,000 artifacts from more than 125 archaeological sites. Prepared grant applications, managed grant funding, directed student laboratory assistants, and prepared comprehensive inventory of archaeological collections. Consulted with agencies and Nations to coordinate the repatriation of sacred/ceremonial objects and human remains to Nations. 2005-2018.

Carleton Island, Cape Vincent, NY - Ph.D. Dissertation Research Project. Archaeological survey and excavation at the site of Fort Haldimand, a late-eighteenth century British military fortification located in the Thousand Islands. Excavations at both soldiers' and officers' barracks to better understand living conditions in the eighteenth-century upper St. Lawrence Valley. 1998-2002, 2011–Present.

Burning Springs Site, Bristol, NY - Supervised the public excavation conducted through the Lewis Henry Morgan Chapter, New York State Archaeological Association. A multi-component seventeenth century site visited by the explorer LaSalle while he was in the Seneca territory before moving westward. Archaeological testing of approximately 6 acres to investigate any long-term use of the springs area by the Haudenosaunee, and early historic-period residents of the Bristol Valley. 2010-2013.

Warderwick Wells, Exuma Cay Land & Sea Park, Bahamas - Worked within the Exuma Cays Land and Sea Park to map and survey archaeological sites believed to be associated American Loyalist refugee settlements. Six activity areas mapped and recorded, including potential burial ground. Archival investigations completed at the Bahamas National Archives, Nassau and the National Archives, UK. 2010-2012.

John Brown Hall at the Harriet Tubman Home, Auburn, NY - Field Supervisor for the Syracuse University archaeological field school at the site of the home that Harriet Tubman built for elderly, former slaves. 1998.

Chittenango Landing Canal Boat Museum, Chittenango, NY - Field Supervisor for the Syracuse University archaeological field school at a nineteenth century worker's house at an Erie Canal dry dock complex. 1994.

Publications and Reports

"A very laborious task:" British colonial policy and Fort Haldimand on Carleton Island, New York (1778-1784). In *British Forts and Their Communities: Archaeological and Historical Perspectives*, Christopher R. DeCorse and Zachary James Beier, eds. Gainesville: University Press of Florida, 2018.

NAGPRA Consultation/Documentation Grant Final Project Report, Grant # 36—12—GP—583. Submitted to National NAGPRA, United States Department of the Interior on behalf of the Research Foundation for the State University of New York. 2016

NAGPRA Consultation/Documentation Grant Final Project Report, Grant # 36—11—GP—553. Submitted to National NAGPRA, United States Department of the Interior on behalf of the Research Foundation for the State University of New York. 2016

NAGPRA Consultation/Documentation Grant Final Project Report, Grant # 36—08—GP—488. Submitted to National NAGPRA, United States Department of the Interior on behalf of the Research Foundation for the State University of New York. 2011

"Distressed for want of provision:" Supplying the British soldier on Carleton Island (1778-1784). In *Soldiers, Cities and Landscapes: Papers in honor of Charles L. Fisher*. Penelope Drooker and John Hart, eds. Albany: New York State Museum Bulletin 513, 2010.

For want of provisions: an archaeological and historical investigation of the British soldier at Fort Haldimand, 1778–84. Dissertation produced for Doctor of Philosophy degree in anthropology. Maxwell School of Citizenship and Public Affairs, Syracuse University. 2010.

The British soldier on Carleton Island: an archaeological perspective. *Historic Kingston* 53 (1). 2005. century worker's house at an Erie Canal dry dock complex. 1994.

Conference Presentations

Reforming the Collection: Documentation, Fieldwork and the NAGPRA Process at State University of New York (SUNY), College at Oswego. Poster presentation for the annual meeting of the Society for Historical Archaeology, New Orleans, 2018.

The British on Lake Ontario During the American Revolution: an Archaeological Perspective. Paper presented at the Fort Ontario Conference on Military History and Archaeology, Oswego, NY, 2017.

On the Border, in Between Two Wars: Carleton Island in Canadian and American Identity. Paper presented at the annual meeting of the Council for Northeast Historical Archaeology, Ottawa, Ontario, 2016

The Officers' Barracks and Current Archaeological Investigations at Fort Haldimand, Carleton Island, New York. Poster presentation at the annual meeting of the Society for Historical Archaeology, Quebec City, Quebec, 2014

"It is promised to them:" Loyalist refugees' adaptation in the Exuma Cays, Bahamas (1784-1810). Paper presented at the annual meeting of the Society for Historical Archaeology, Leicester, UK, 2013.

"A very laborious task:" British colonial policy and the establishment of Fort Haldimand on Carleton Island (1778–1784). Paper presented at the annual meeting of the Society for American Archaeology, Honolulu, HI, 2013.

The SUNY Oswego NAGPRA Compliance Project. Progress report delivered to the NAGPRA Review Committee, National Museum of the American Indian, Washington, D.C., 2012.

Grants and Awards

Faculty Scholarly and Creative Activity Grant. Awarded by SUNY Oswego, to support archival research in London, 2016-17.

President's Award for Excellence in Academic Advisement. SUNY Oswego, 2012.

NAGPRA Consultation and Documentation Grant. Project director & co-recipient with Paul Tomascak and Kathleen Blake. Awarded \$49,500 from the National Park Service for the acquisition of a portable, x-ray fluorescence analyzer for the NAGPRA archaeology lab, The Research Foundation for the State University of New York, SUNY Oswego, 2012.

NAGPRA Consultation and Documentation Grant. Project director. Awarded \$90,000 from the National Park Service to support collections management at SUNY Oswego, The Research Foundation for the State University of New York, 2011.

NAGPRA Consultation and Documentation Grant. Project director. Awarded \$75,000 from the National Park Service to support collections management at SUNY Oswego, 2008.

Award for Meritorious Service. Given by the New York State Archaeological Association for service to the Lewis Henry Morgan Chapter, Rochester, 2006.

Public Archaeology and Invited Presentations

Panel Discussant, Oswego in the French and Indian War and the War of 1812. Plenary session. The Fort Ontario Conference on Military History and Archaeology, Oswego, NY, 2017.

Plates, Buttons and Bowls: The Domestic Life of the British Soldier on Carleton Island 1778–1784. Invited presentation at the Cape Vincent Historical Weekend Celebration, Cape Vincent, NY, 2016.

TILT Trek. On-site archaeological presentation, activities, and tour of Fort Haldimand, Carleton Island, NY. Organized by the Thousand Islands Land Trust, Clayton, NY, 2015.

Archaeological Investigation of the Royal Highland Emigrants on Carleton Island, 1778–1784. Invited presentation at the International Archaeology Day Symposium, Fort Stanwix National Monument, Rome, NY, 2014.

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

Case No(s). 23-0930-EL-BGN

Summary: Testimony - Direct Testimony of Douglas J. Pippin, PhD, RPA
electronically filed by Christine M.T. Pirik on behalf of Richwood Solar, LLC.