

Exhibit T
**Birch Solar Project Cultural Resources Work
Plan**

Weller and Associates

August 10, 2020



1395 West Fifth Avenue
Columbus, Ohio 43212
Ph: 614-485-9435
Fx: 614-485-9439
Web: www.wellercrm.com

August 10, 2020

Ohio State Historic Preservation Office
Attn: Krista Horrocks
Ohio State Historic Preservation Office
800 E. 17th Ave.
Columbus, Ohio 43211

**RE: Phase I Cultural Resource Management Investigations for the Approximately
1,900-acre Birch Lima Solar Panel Farm in Auglaize and Allen Counties, Ohio**

Weller & Associates, Inc. is submitting the above titled Phase I technical proposal to the Ohio History Connection on behalf of:

Stantec Consulting Group, Inc.
3001 Washington Boulevard Suite 500
Arlington, VA 22201

As you will see below, the work plan incorporates:

- An archaeological research design adhering to the guidelines of the Ohio State Historic Preservation Office (SHPO 1994) and incorporating the entirety of the proposed project area and limits of disturbances, and;
- A history/architecture survey incorporating the entirety of the proposed project area, areas of direct/indirect effects, as well as an area extending within the proposed facilities' line-of-sight but not to exceed one mile.

The proposed project is subject to review by the Ohio Power Siting Board. This work plan is being submitted pursuant to regulations and stipulations set forth by the Ohio Power Siting Board and in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1992, U.S.C. 470f (Appendix A) and should be reviewed accordingly. We are requesting concurrence from SHPO for this proposed work plan or any necessary revisions to the work plan

Sincerely,

A handwritten signature in dark ink, appearing to read "Josh Engle".

Joshua D. Engle, M.A.
Principal Investigator
Weller & Associates, Inc.

**TECHNICAL PROPOSAL FOR
PHASE I CULTURAL RESOURCE MANAGEMENT INVESTIGATIONS FOR
THE APPROXIMATELY 1,900-ACRE BIRCH LIMA SOLAR PANEL FARM IN
AUGLAIZE AND ALLEN COUNTIES, OHIO**

Prepared for:

Ohio History Connection
Ohio State Historic Preservation Office
800 E. 17th Avenue
Columbus, Ohio 43211

Prepared by:

Weller and Associates, Inc.
1395 West Fifth Ave
Columbus, Ohio 43212
Phone: (614) 485-9435
rweller@wellercrm.com

August 10, 2020

TECHNICAL PROPOSAL FOR PHASE I CULTURAL RESOURCE MANAGEMENT INVESTIGATIONS FOR THE APPROXIMATELY 1,900-ACRE BIRCH LIMA SOLAR PANEL FARM IN AUGLAIZE AND ALLEN COUNTIES, OHIO

Introduction

The project will consist of the construction of a solar panel construction area/development southwest of Lima, Ohio. The cost proposal accounts for an approximately 1,900-acre area that includes the solar array area and staging area. The cultural resource management investigations are subject to review by the Ohio Power Siting Board (OPSB) and possibly the Army Corps of Engineers (USACE). The project area mostly involves a series of agricultural fields and in a rural area that is to the southwest of Lima. This is a relatively flat or gently sloping area drained by Twomile Creek and the Ottawa River. The area includes parts of a historic Shawnee reservation and Wapakoneta village/reservation which are particularly culturally sensitive areas. The exact placement of any facility structures within the area are currently unknown, so the entire area will be subjected to survey and will be considered the project direct area of potential effects (APE). Phase I archaeological identification survey will be conducted within entirety of the proposed project area and limits of disturbances (APE). In addition, indirect effects will be accounted for in the form of an architectural survey for an area extending within the proposed facilities line-of-sight but not to exceed one mile as discussed below.

The Scope of Work (SOW) includes the following tasks to be completed to guidelines of the SHPO (SHPO 1994).

Scope of Work

Task 1 – Records Review. This task will be completed using the SHPO's Online Mapping System (OMS) and available historic mapping/documents. For the archaeological survey, all previously recorded archaeological resources and previous surveys within a one-mile radius will be included in the literature review. In addition, background research will be completed to review historic maps, atlases, and other sources that might provide information for the locations of historic-era sites, areas of prior disturbance, etc. The literature review will use a 1.6 km (1 mi) study area. This allows for an understanding as to the amount of previously recorded resources near the project. In conducting the literature review, the following resources will be consulted:

- 1) *An Archaeological Atlas of Ohio* (Mills 1914);
- 2) SHPO United States Geological Survey (USGS) 7.5' series topographic maps;
- 3) Ohio Archaeological Inventory (OAI) files;
- 4) Ohio Historic Inventory (OHI) files;
- 5) National Register of Historic Places (NRHP) files;
- 6) Determinations of Eligibility (DOE) files;
- 7) SHPO CRM/contract archaeology files; and
- 8) County atlases, histories, historic USGS 15' series topographic map(s), and current USGS 7.5' series topographic map(s);
- 9) Online Genealogical and Cemetery Records

Task 2 –Phase I Survey. This method will include archaeological testing of the entire project area. Phase I archaeological identification survey for this project will be completed to guidelines (1994) of the SHPO. Landforms or areas with slope less than 15% that support poor visibility (e.g., areas of pasture, forest, etc.) are to be examined by systematic shovel testing. In areas where slope is in excess of 15%, pedestrian survey is the primary method of investigation.

The Phase I survey will be completed using the following methods:

- *Pedestrian Survey* – this method is used to survey landforms having slopes in excess of 15%, or areas with slopes less than 15% where surface visibility is 50% or greater (e.g., plowed field). The survey transect interval is 10 m. All identified prehistoric period artifacts are collected and provenienced. Historic period sites will likely have the boundary of the deposit plotted and a representative sample of the materials collected.
- *Shovel Testing* – this method is used to sample subsurface contexts in areas with poor visibility supporting slopes less than 15%. A shovel test pit (STP) is 50-x-50 cm square. The STPs are excavated on grid at 15 m intervals – additional radial STPs are required at 5 m or 2.5 m intervals when any artifacts are discovered. Excavated soil is screened through 0.25-inch mesh. STPs are to be excavated no deeper than 1 m.
- *Visual Inspection* – This method is reserved for areas that are found to be contained in standing water and not suitable for sampling. It is also used to inspect the surrounding terrain and setting to better understand the landscape.

The crew will be directly supervised in the field by an MA-level archaeologist. GPS units will be used to ensure field personnel maintain accurate survey tracts and do not extend survey outside the project survey corridor. The results of the records review and field survey will be documented to SHPO specifications.

Task 3 – Define Visual Effects APE. Weller will employ a visual APE that includes the area of direct effect, the project area, and an area extending within the proposed facilities line-of-sight but not to exceed one mile. The resulting “Visual APE” will be examined systematically for evidence of aboveground resources (e.g., buildings, structures, cemeteries, etc.) 50 years or older. Based on historical mapping and current aerial mapping, it appears that there are numerous resources in the study area.

Task 4 – Cultural Historic Survey. The approach to the field survey will account for all aboveground resources 50 years and older located within the project and visual APEs, and will be completed to guidelines (2014) of the SHPO. However, we will focus time and resources on the development of a historic context and the evaluation of likely National Register-eligible properties. This approach to the survey will include systematic survey and mapping of all buildings 50 years of age or older in the APE in order to identify those with National Register potential followed by a more intensive documentation and evaluation of potentially eligible aboveground resources, if such properties exist within the APE.

The comprehensive survey will involve the identification and preliminary evaluation of aboveground resources 50 years of age or older in the APE and the recording of each to a baseline level of documentation (including location, age, building type, building style, construction, materials, and alterations). Documentation tables completed in the field will be reviewed for accuracy and completeness and will be exported to Excel for data analysis. A summary and analysis of the field data detailing the overall architectural character of the APE will be included in the body of the report, as will representative photographs. Photographs of every resource that is 50 years of age or older, keyed to the results table, will be included as an appendix to the report.

Weller historians will analyze the data and identify properties that are clearly ineligible for the National Register due to a lack of associative significance or loss of integrity, as well as potential National Register-eligible properties to advance them to the next stage of documentation and evaluation. Each property advanced to intensive survey will be documented on an Ohio Historic Inventory form following guidelines

established in How to Complete the Ohio Historic Inventory (Gordon 1992). The OHI contains detailed historical and descriptive information, a location map, site plan, and additional photographs. The OHI will be submitted utilizing the SHPO I-Form electronic application. This more intensive level of documentation will produce sufficient information about historic properties to permit them to be evaluated or re-evaluated for significance according to the National Register Criteria for Evaluation. The intensive-level documentation includes collecting information that specifically explains the relationship of a property to the important themes and property types identified in the comprehensive survey. This additional research often includes establishing a chain of title, the examination of census records and tax data, placing each property within the historic context, and informant interviews if possible. The additional research will support final recommendations of non-eligibility or eligibility, and the delineation of historic property boundaries.

Task 5 – Assessment of Effects. Weller will describe the relationship of the proposed project to any historic properties located within the APE and apply the Criteria of Adverse Effect (36CFR800.5). An undertaking is considered to have an adverse effect on an historic property when it may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, or association. Weller will offer a determination of effect for any historic property within the APE and conclude the report with an effect finding for the project. In addition, any above ground National Register of Historic Places listed property or Determination of Eligibility property on file at the SHPO within the 1-mile literature review radius will be considered for potential effects based on OPSB rules for power generation facilities.

Archaeological Laboratory Work

All recovered artifacts will be collected and transported to the Weller laboratory in Columbus, Ohio. At the laboratory, recovered artifacts will be cleaned and conserved in a manner appropriate to assure their stability. All analyzed diagnostic artifacts will be fully provenienced and labeled. All artifacts, which may provide significant interpretive value to the site, will be fully analyzed. The cultural and temporal affiliation, material of manufacture, style, function, form, etc. of recovered artifacts will be identified to the fullest extent possible. Representative photographs of diagnostic artifacts recovered during the survey will be included in the report as well as a detailed inventory of all recovered artifacts by provenience. Project field notes, records, and site photographs and any other documentation and artifacts will be retained by Weller until the final report has been accepted by SHPO. Following the acceptance of the final report, a letter regarding the disposition of the cultural materials (artifacts) identified and collected during survey for this project will be sent to the landowner.

Report Preparation

The results and recommendations associated with this Phase I archaeological and architectural survey will be presented in two separate detailed technical reports prepared in accordance with SHPO guidelines (SHPO 1994). The final reports will be created in Microsoft Word and single-spaced on standard sized (8.5 x 11 inch) white paper. Page numbers will appear on all pages. Maps, photographs, and other graphics will be clearly presented. Maps will include the locations of all recorded resources, and detailed GIS and AutoCAD maps. Final reports will be suitable for submission to the SHPO.

Project field notes, records, and site photographs and any other documentation and artifacts will be retained by Weller until the final report has been accepted by SHPO. Following the acceptance of the final report, the artifacts and a copy of attendant documentation will be returned to the landowner at their request. Originals of the attendant documentation will be retained at Weller's office.

Human Remains

In the unlikely event that human remains are discovered during the excavations, all work in the area of the discovery will cease and the Allen or Auglaize County Sheriff and SHPO will be notified of the discovery.

FOR Weller & Associates, Inc.:



Signed: _____

Name: Joshua Engle, M.A., RPA
Position: Principal Investigator

References

Ohio Historic Preservation Office

1994 *Archaeology Guidelines*. Ohio State Historic Preservation Office, Columbus, Ohio.

2014 *Guidelines for Conducting History/Architecture Surveys in Ohio*. The Ohio Historical Society and Ohio Historic Preservation Office, Columbus, Ohio.

Ohio History Connection Consultation



In reply, refer to
2020-ALL-49242

September 2, 2020

Ryan Weller
Weller & Associates, Inc.
1395 W. Fifth Ave.
Columbus, OH 43212

RE: Birch Lima Solar Panel Farm Project, Allen and Auglaize Counties, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received electronically on August 10, 2020 regarding the proposed Birch Lima Solar Panel Farm Project, Allen and Auglaize Counties, Ohio. 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 and 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]).

Our office has reviewed the *Technical Proposal for Phase I Cultural Resource Management Investigations for the approximately 1,900-acre Birch Lima Solar Panel Farm in Auglaize and Allen Counties, Ohio*, which includes a work plan consisting of Records Review, Phase I Survey, Define Visual Effects APE, Cultural Historic Survey, and Assessment of Effects. The Phase I Archaeological Survey will include testing of the entire project area. Survey will be completed to guidelines (1994) of the SHPO. Cultural Historic Survey will account for all aboveground resources 50 years and older within the project and visual APE's and will be completed to guidelines (2014) of the SHPO. Previous solar project submissions have provided a Visual Resource Assessment (VRA) using only the topography (not vegetation) to screen the views to all aspects of the solar farm installation. Based on these previous VRAs, the visual APE can extend up to 2 miles, and in some cases beyond. These VRAs can also show that certain areas have no visibility to the project even if the property is within 1-mile. It is recommended that a VRA be submitted to the SHPO for review to determine a more appropriate visual APE, before a reconnaissance level history/architecture survey is performed.

Our office looks forward to additional coordination for the Birch Lima Solar Panel Farm Project. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorricks@ohiohistory.org, or Kristen Koehlinger at kkoehlinger@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1085142

From: [Kristen Koehlinger](#)
To: [Dohoney, Courtney](#); [Diana Welling](#)
Cc: [Krista Horrocks](#); [Ryan Weller](#); [Shanelle Montana](#); [Alyssa Edwards](#); [cpirik](#)
Subject: RE: Birch SHPO Meeting; Lima vicinity solar farm (shawnee township)
Date: Monday, January 4, 2021 2:25:18 PM
Attachments: [image001.jpg](#)

Courtney,

Thank you for these changes. The SHPO agrees with these modifications, including reducing the buffer to 1-mile to the northeast, east, and southeast of the solar facility.

If you have any questions, please let me know.

Sincerely,

Kristen Koehlinger | Project Reviews Manager, State Historic Preservation Office

Ohio History Connection | 800 E. 17th Ave., Columbus, OH 43211-2474
p. 614-298-2000 | kkoehlinger@ohiohistory.org

Did you know the Ohio SHPO now accepts electronic-only submissions for state and/or federal review under Section 106 and ORC 149.53? Please send your submissions to section106@ohiohistory.org. We have also updated our [Survey Report Submission Standards](#).

From: Dohoney, Courtney [mailto: Courtney.Dohoney@stantec.com]
Sent: Monday, December 7, 2020 11:21 AM
To: Kristen Koehlinger <kkoehlinger@ohiohistory.org>; Diana Welling <dwelling@ohiohistory.org>
Cc: Krista Horrocks <khorricks@ohiohistory.org>; Ryan Weller <rweller@wellercrm.com>; shanelle.montana <shanelle.montana@lightsourcebp.com>; Alyssa Edwards <alyssa.edwards@lightsourcebp.com>; cpirik <cpirik@dickinson-wright.com>
Subject: RE: Birch SHPO Meeting; Lima vicinity solar farm (shawnee township)

Hi Kristen,

Apologies for the delayed response, but thank you for the additional rationale behind the recommendations your office had previously provided regarding the history/architecture survey for the Birch Solar Project. Lightsource has been working to continue to refine the site design and we'd like to confirm the approach to proceed with for the H/A survey and ensure that we're clear on expectations based on the previous email exchange.

- We will complete a desktop literature review for the project area and a 5-mile buffer
- We will update the viewshed model from what was previously provided (attached) with the most recent project layout to identify locations within a 2-mile buffer of the project area where based on topography only, the project will not be visible from and therefore no impacts are expected.
- We will complete a reconnaissance level survey for all portions of the 2-mile buffer where the viewshed model indicates project visibility.

We would like to request one modification to the 2-mile survey extent as the 2-mile buffer would extend into the more densely populated residential portions of Lima, Fort Shawnee, and Cridersville (see attached figure with the updated site design and corresponding survey buffers). Because of the density of homes in those areas, the project with a height of no more than 10 feet, would be obstructed from view by the first 2-3 blocks of residences. As such, we propose limiting the survey to the originally proposed 1-mile buffer along the eastern, northeastern, and southeastern portions of the project.

Please let us know if we've addressed your concerns from our previously proposed A/H work plan. We are happy to jump on a call to discuss this further if needed.

Thanks,
Courtney

Courtney Dohoney
Stantec
Office: 703.485.8554
Mobile: 312.636.6848

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/12/2021 12:29:29 PM

in

Case No(s). 20-1605-EL-BGN

Summary: Application - 26 of 31 (Exhibit T – Cultural Resources Work Plan) electronically filed by Christine M.T. Pirik on behalf of Birch Solar 1, LLC