



Union Ridge Solar

Exhibit R

Phase I Archaeological Reconnaissance Survey

Case No. 20-1757-EL-BGN



In reply refer to:
2020-LIC-49668-5

February 1, 2021

Ryan J. Weller
Weller & Associates, Inc.
1395 West Fifth Avenue
Columbus, Ohio 43212

RE: Section 106 Review-Addendum Archaeological Investigations for the Union Ridge Solar Project in Harrison Township, Licking County, Ohio.

Dear Mr. Weller:

This letter is in response to the correspondence received on January 8, 2021 regarding additional areas within the Union Ridge Solar Project, Harrison Township, Licking, 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 (OPSB) rules. 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 addendum archaeological survey involved shovel test unit/probe excavations and visual inspection of expansion areas. The current survey identified one previously undocumented archaeological deposit within the Southeastern Expansion Area, as defined within the current addendum report. Site 33LI2681 is an unassigned prehistoric isolated find consisting of a non-diagnostic, lithic debitage artifact. This site is not considered eligible for the National Register of Historic Places (NRHP), and therefore no further archaeological investigations are warranted.

After careful review of the addendum archaeological report, our office concurs with Weller that, as proposed, there will be no effect on significant archaeological resources. No further archaeological investigations or coordination are warranted for the project unless the scope of work changes or new/additional archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as required by 36 CFR § 800.13. If you have any questions concerning this review, please contact me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Stephen M. Biehl".

Stephen M. Biehl, Project Reviews Coordinator (archaeology)
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1086838

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • ohiohistory.org



In reply refer to:
2020-LIC-49668-2

January 4, 2021

Ryan J. Weller
Weller & Associates, Inc.
1395 West Fifth Avenue
Columbus, Ohio 43212

RE: Section 106 Review-Phase I Archaeological Survey, Union Ridge Solar Project, Harrison Township, Licking County, Ohio.

Dear Mr. Weller:

This letter is in response to the correspondence received on December 7, 2020 regarding the proposed Union Ridge Solar Project (formerly known as Trillium Solar Farm) that is being permitted by the Ohio Power Siting Board (OPSB). 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 requesting cooperation among state agencies in the preservation of historic properties, Ohio Administrative Code Chapters 4906-4-08 (D). 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 proposed undertaking involves the construction of a solar energy facility and its' related infrastructure within a proposed 497.8-acre parcel, which is defined as the direct Area of Potential Effect (APE). The following review and comments pertain only to the *Phase I Archaeological Investigations for the 201.5 ha (497.8 ac) Union Ridge Solar Project in Harrison Township, Licking County, Ohio* by Weller & Associates, Inc. (Weller 2020). The architectural component will be submitted in a stand-alone report, and therefore the review will be under a separate cover.

The archaeological survey involved a literature review, surface collection, and visual inspection of the entire APE, as defined above. The literature review revealed no previously documented archaeological sites within or immediately adjacent to the APE. Furthermore, it was determined that the APE had not been subjected to any previous cultural resource studies prior to this survey. However, the literature review did identify numerous low-density archaeological sites within the defined study radius.

The archaeological field work involved surface collection and visual inspection which resulted in the identification of 48 previously undocumented archaeological sites, 33LI2628-2675. Sites 33LI2629-2632, 33LI2634-2635, 33LI2637-2640, 33LI2642-2644, 33LI2646-2647, 33LI2649, 33LI2652-2658, 33LI2660-2662, 33LI2664-2666, 33LI2668-2672, and 33LI2674 are documented as prehistoric isolated finds represented by a variety of artifact types, including lithic debitage, flake tool, biface, and projectile points. Sites 33LI2633, 33LI2636, 33LI2641, 33LI2645, 33LI2650, 33LI2659, 33LI2663, 33LI2667, and 33LI2673 are low-density prehistoric scatters represented by 2-9 artifacts. Three sites, 33LI2648, 33LI2651, and 33LI2675 are historic-era scatters represented by less than 20 artifacts per site. Based on the available data, the SHPO concurs with Weller that these sites are not considered eligible for inclusion to the National Register of Historic Places (NRHP) under Criterion D. Therefore, as designed, there will be no effect on significant archaeological resources within the APE. No further archaeological investigations are warranted for the 497.8-acre APE unless the scope of work changes or new/additional

2020-LIC-49668

January 4, 2021

Page 2

archaeological remains are discovered during the course of construction. In such a situation, this office should be contacted. If you have any questions concerning this review, please contact me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Stephen M. Biehl". The signature is written in a cursive style with a large initial 'S'.

Stephen M. Biehl, Project Reviews Coordinator (archaeology)
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1086486

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."