Appendix C – Cultural Resources Memo



United States Department of Agriculture Rural Development

November 1, 2011

Mr. Nathan Young Project Reviews Manager Ohio Historic Preservation Office 800 E. 17th Ave. Columbus, OH 43211-2474

RE:

Determination of No Effects to Historic Properties Turning Point Solar Generating Facility Project Brookfield Township, Noble County, Ohio

Dear Mr. Young:

The Rural Utilities Service (RUS) may provide financial assistance to Turning Point Solar LLC to construct the proposed Turning Point Solar Generating Facility (Project) in Brookfield Township, Noble County, Ohio. This potential RUS action is an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800).

Turning Point Solar LLC proposes to construct the Project on 400 acres of a 770-acre site. Project components include the installation of approximately 239,400 photovoltaic panel arrays ground-mounted on fixed solar racking equipment. The project also includes construction of a 1.87-mile long 69 kV transmission line and supporting ancillary facilities. Line construction would involve the installation of monopole structures of 60 feet in height. Span width between structures would be approximately 250-300 feet. The line would also require clearing a right-of-way of approximately 50 feet in width. Access to construct and maintain the line would be from nearby roads and within the line's proposed right-of-way. Approximately 0.58 miles of the line would be sited through an area adjacent to Chapel Drive (County Route 20). The remaining 1.29 miles of line would be located adjacent to an existing 69 kV transmission line. The Area of Potential Effect (APE) for archaeology is determined to be the entire 770 acre site and the proposed transmission line corridor. The visual APE for effects to above-ground historic properties is a 1-mile buffer surrounding the Project site.

A Cultural Resource Review Memorandum (see enclosure) was completed for the proposed Project by URS. The memorandum includes an archival records review and windshield/pedestrian inspection, which focused on the identification of non-disturbed landforms indicative of Native American burial mounds, cemeteries, burials, and other important archaeological properties that could be within the archeological APE. Results from the

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windshield/pedestrian inspection indicate that the entire archaeological APE has been severely disturbed by past land uses on the 770-acre site (i.e., strip mine land). Although not explicit in the report, the proposed transmission line corridor also appears to be sited through or adjacent to previously disturbed areas, therefore decreasing the likelihood of intact historic properties being present within the corridor. The memorandum also documents two known sites (NO0061 and NO0062) within the visual APE. While these sites were not evaluated for National Register eligibility, the Project does not appear to be visible to these sites because of vegetative screening. No other historic above-ground historic properties were noted during the windshield/pedestrian inspection. Accordingly, RUS has determined that a finding of no effects to historic properties is appropriate for the Project.

Please review this finding of effects and notify RUS within thirty (30) days of receipt of this letter of your concurrence or objection. If the SHPO fails to respond within this time frame, RUS will conclude Section 106 review for these projects in accordance with 36 CFR § 800.3(c)(4) on the basis of the finding of no historic properties affected. Should you have any questions, please contact RUS's environmental review coordinator for this project, Ms. Lauren McGee, at lauren.mcgee@wdc.usda.gov or (202) 720-1482.

Sincerely,

Mark S. Plank

MARK S. PLANK Director Engineering and Environmental Staff USDA, Rural Utilities Service

cc:
Apolka Totth, Turning Point Solar LLC, <u>pat.bormann@wdc.usda.gov</u>
Jim Burns, URS, <u>phil.kinser@swiarec.coop</u>



October 28, 2011

Ms. Lauren McGee Environmental Scientist Rural Development | Rural Utilities Service (RUS) U.S. Department of Agriculture Mail Stop 1571 | Room 2244-S 1400 Independence Ave, SW | Washington, DC 20250

RE: Turning Point Solar Generating Project Brookfield Township, Noble County, Ohio

Dear Ms. McGee:

It is URS' understanding that on August 1, 2011, you had a discussion with Mr. Nathan Young of the Ohio Historic Preservation Office (OHPO) regarding the Turning Point Solar Generating Project (the Project) in Brookfield Township, Noble County, Ohio. Information from this conversation was relayed to URS Corporation (URS), Cincinnati, Ohio, in an email from our client, Turning Point Solar LLC (TPS), a joint venture between Agile Energy Inc. and New Harvest Ventures.

Based on the Section 106 requirements of the National Historic Preservation Act, the U.S. Department of Agriculture, Rural Development, Rural Utilities Service (RUS) needs to submit a findings of effect letter to the OHPO, in order to allow for OHPO comment on the Project. According to Mr. Young, this letter should include: a project description documenting the ground disturbance associated with the Project, a description of previous land disturbance, a definition of the Area of Potential Effect (APE), a summary of the literature review and backgrounds check, a summary of the site visit results, and recommendations of potential effects to cultural properties possibly impacted by the Project. The following letter report provides documentation intended to address the OHPO's requests as outlined above.

Project Description

The Project, totaling 770 acres, is a proposed solar generation facility which will use approximately 239,400 high-efficiency monocrystalline photovoltaic panel arrays mounted on fixed solar racking equipment to create enough power to service 7,500 to 8,000 homes in eastern Ohio, and will displace approximately 65,000 tons of carbon dioxide from the environment annually. These solar panels will be located throughout the Project Area, and the solar modules will canopy over the ground surface following the existing contours of the land, where possible. The entire Project will be enclosed within a six-foot high chain link fence topped with barbed wire, and will interconnect to Columbus Southern Power's South Cumberland 138/69 kV substation.



The Project will be constructed on reclaimed coal strip mine land owned by Ohio Power Company located within Noble County, Ohio; about eight miles northwest of Caldwell, Ohio (see Attachment A, Figures 1 and 2). The land was mined by the Central Ohio Coal Company between 1969 and 1991 and has since been reclaimed as forest and pasture.

The direct APE for this Project consists of the land that will be directly impacted by ground disturbance, which for this literature review and site visit is considered to be the entire 770 acres. However, it is important to note that only 400 acres of the Project will eventually be subject to ground disturbance (see Attachment A, Figures 3 and 4). This ground disturbance will involve significant grading of approximately 300 acres, with the remaining 100 acres cleared and grubbed of vegetation and roller compacted. All disturbed areas will be revegetated back to its original state. The surrounding viewshed (the indirect APE) includes all cultural resources that may be visually impacted by the construction of the Project within one mile of the direct APE.

Geographical Information

The Project is located within a reclaimed strip mine, in a very rural setting adjacent to State Route 83 (Renrock Road) and County Highway 20 (Chapel Drive) (see Attachment A, Figures 1 and 2; Attachment B, Figures 2-13). When the mining operations ceased in the early 1990s, reclamation efforts required gently rolling grasslands to be established. The site was graded and seeded for open grass fields and ponds. As a result, the general Project Area consists of rolling terrain of open grass fields and pastures used for livestock and recreation. The rolling terrain ranges in elevation from 990 feet to 1,090 feet above mean sea level (AMSL), with slopes ranging from approximately one to 20 percent.

According to the soil survey for Noble County, Ohio, the soils within the direct APE consist of the Udorthents-Pits soil complex and Morristown soils (Waters and Roth 1990), which indicates that the entire direct APE has been disturbed. The Udorthents-Pits soil complex, roughly located within the southern two thirds of the direct APE, is typical of areas that have been surface-mined for coal or limestone consisting of a mixture of rock fragments and unweathered fine material. These soils correspond with the areas labeled as strip mined on the USGS topographic map (see Attachment A, Figure 1).

Morristown silty clay loams are documented in the northern third of the direct APE and are typically located on mine-spoil ridgetops in areas that have been surface-mined for coal. The area has then been reclaimed by grading and the surface covered with a layer of material removed from areas of other soils.



Ohio Historic Preservation Office Records Check

URS consulted the OHPO on-line mapping system in March and August 2011, in an effort to locate inventoried cultural resources within the APE. The background records check was conducted for the entire 770-acre direct APE, in addition to a one-mile (1.6-kilometer) buffer around the direct APE, which includes the indirect APE. For ease of reference this one-mile buffer is referred to as the *Study Area*, and includes both the direct and indirect APE. The archival study included a review of the cultural resources and previous survey work inventoried with the OHPO, as detailed in the Ohio Archaeological Inventory (OAI), Ohio Historic Inventory (OHI), and National Register of Historic Places (NRHP).

Based on the background check, two archaeological sites and two previous cultural resource surveys have previously been identified within the Study Area, none of which occur within the direct APE of the Project. In addition, the Brookfield Cemetery was identified within the Study Area through review of the USGS 7.5 minute topographic map. There were no historic aboveground resources or NRHP-listed properties indicated within the Study Area for the Project (Attachment A, Figures 1 and 2).

Archaeological Sites

The two OAI-listed archaeological sites within the Study Area are both unassigned prehistoric occupations (Table 1). These sites occur in an open setting, and distance to water ranges from approximately 220 meters to 270 meters (724 feet to 888 feet). The NRHP status of these sites is not available through the OHPO on-line mapping system and neither site was defined in close proximity to the direct APE of the Project.

Table 1. Previously Recorded Archaeological Sites within the Study Area.

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OAI Site #	Temporal Period	Setting	Distance to Water (meters/ feet)	Distance from Study Area (meters/ feet)			
33No0061	Unassigned Prehistoric	Open Site	220/724	1430/ 4690			
33No0062	Unassigned Prehistoric	Open Site	270/ 888	1258/4127			

The results of the background check for archaeological sites, as outlined in Table 1 above, indicate that very few archaeological sites have been identified across this portion of Noble County. However, this may be the result of a lack of cultural resources survey during the modern era, given the rural setting of Noble County, and not reflective of a lack of prehistoric occupation or activity.



Previous Cultural Resource Survey Areas

There have been two previous cultural resources investigations, both Phase I-level surveys, conducted within the Study Area (see Attachment A, Figures 1 and 2). Table 2 summarizes these surveys. None of the previous cultural resource surveys extended within the direct APE, however, survey ID# 14486 is located 191 meters/627 feet to the south of the direct APE. There does not appear to have been any cultural resources identified from either survey.

Table 2. Summary of Previous Cultural Resource Surveys.

ID#	Date	Authors	Title of Report	Size of Surveyed Area (acres)	Distance from Study Area (meters/ feet)
T0004	1994	Luella Beth Hilen	Second Addendum: Reconnaissance Survey for a Proposed Gas Pipeline through portions of Fairfield, Perry, Muskingum, and Noble Counties, Ohio	3.2	419/ 1374
14486	1993	Rae Norris Sprague	Reconnaissance Survey for a Proposed Gas Pipeline through portions of Fairfield, Perry, Muskingum, and Noble Counties, Ohio	129	191/627

Cemeteries

No cemeteries were identified through the OHPO on-line mapping system. However, review of the USGS 7.5 minute topographic map identified one cemetery (Brookfield Cemetery) within the Study Area, on the west side of Route 83 (Renrock Road), approximately 2,000 feet from the direct APE of the Project. According to the website www.findagrave.com, a listing of 167 grave markers have been recorded for this cemetery (Attachment B, Figure 2). The oldest grave marker inventoried on this website dates to 1817, while the most recent dates to 1979. No other information could be obtained to indicate the nature and association of the Brookfield Cemetery (a single family cemetery, associated with a church, etc.).

Results of the URS Site Visit

A site visit to the Project was conducted by URS on August 23, 2011 to document any visible disturbance within the direct APE and to examine the surrounding viewshed of the Project (see Attachment B, Figures 1-13). The site visit confirmed that the Project had been previously disturbed by strip mining, as evidenced by the reclamation efforts of open grasslands and ponds (Attachment B, Figure 4-7). URS also examined exposed soils, which showed evidence of disturbance such as the presence of gravels (not natural) and the absence of topsoil.



Several oil pumps and wells were documented along County Highway 20 (also known as Chapel Drive, which runs through the center of the Project) and within the northeast corner of the direct APE (Attachment B, Figures 3, 10-11). These were the only above-ground features documented within the direct APE, and they do not appear to be 50 years or older.

The assessment of the viewshed confirmed that the Project is situated within a very rural setting of Noble County. The direct APE is within rolling terrain covered in tall grass and pasture. The site visit did not document any above-ground structures (50 years or older) within the direct APE or visible from the direct APE. The nearest above-ground resource, the Brookfield Cemetery, was not visible from the boundary of the direct APE due to an existing treeline (Attachment B, Figures 1 and 2).

Summary and Conclusions

The Project is a proposed solar generation facility encompassing approximately 770 acres of land requirements in a rural, reclaimed strip mine in Noble County. The APE for the Project includes the land directly impacted by ground disturbance (the direct APE), which for this literature review and site visit is considered to be the entire 770 acres, although only 400 acres will be disturbed by the Project (see Attachment A, Figures 3 and 4). The surrounding viewshed (the indirect APE) established for the Project includes all above-ground cultural resources that may be visually impacted by the construction of the Project within one mile of the direct APE.

The literature review and background records check identified two archaeological sites and two previous cultural resource surveys within the Study Area of the Project. Additionally, one cemetery (Brookfield Cemetery) is depicted on the USGS topographic map outside of the direct APE along State Route 83. Both the archaeological sites and the cemetery are located outside of the direct APE, and therefore would not be directly impacted by the Project construction.

The results of the site visit verified that the Project has been previously disturbed by intensive strip-mine activities during the modern era, and is now covered with short grasses and sporadic trees. Several oil wells and pumps occur along County Highway 20 (Chapel Drive), in addition to, a concentration of these features in the northeast corner of the direct APE. These wells and pumps were the only above-ground features documented within the direct APE, and they do not appear to be 50 years or older.

The assessment of the viewshed confirmed that the Project is situated within a very rural setting of Noble County. The site visit did not document any above-ground structures (50 years or older) within the direct APE or visible from the direct APE. The nearest above-ground resource, the Brookfield Cemetery, was not visible from the boundary of the direct APE due to an existing treeline near the cemetery.

URS Corporation 36 East 7th Street, Suite 2300 Cincinnati, Ohio 45202 Tel: 513.651.3440 Fax: 513.651.3452



Archaeological Recommendations

The archival research identified a very low number of archaeological sites (n=2) within one mile of the Project, which suggested a low potential for archaeological resources. This suggestion is supported by previous cultural resources work conducted in the area, which has resulted in few archaeological sites being identified. For example, a pipeline survey conducted just south of the Project surveyed 129 acres and did not identify any archaeological resources.

In addition, the direct APE has been severely disturbed as a result of strip mining as evidenced by the soils documented by Waters and Roth (1990), the exposed soils visible during the URS site visit, and a review of historic aerial photographs and topographic maps (see Attachment C), which illustrate the strip mining activities. It is important to note that although the mapping presented in this document does not illustrate strip mining activities in the northern third of the direct APE, the soils documented within this area (Morristown silty clay loams) indicate that the northern third of the direct APE has been graded with mine spoil.

As a result, given the low probability of recovering archaeological resources as indicated by the background research and that the entire direct APE has been previously disturbed, it is unlikely that significant NRHP-eligible archaeological deposits would be identified within the direct APE. URS recommends no further archaeological work for the Project. This recommendation is consistent with other previous URS projects where strip mined areas have not required survey due to disturbance.

Viewshed Recommendations

Background research did not identify any historic above-ground resources within the Study Area. Only the Brookfield Cemetery was identified within the indirect APE from the USGS topographic map and it is located on the west side of State Route 83, approximately 2,000 feet from the direct APE. This cemetery has graves dating from 1817 to 1979. URS visited the cemetery in August and it was determined that the cemetery was not visible from the boundary of the direct APE, due to an existing treeline near the cemetery. Given that the solar panels will be constructed to canopy over the ground surface following the existing contours of the land (as much as possible) and that the disturbed area will be re-vegetated, viewshed impacts to the cemetery are considered to be minimal and no further cultural resources work is recommended for this resource.

Overall, Project mapping (topographic and aerial) and the URS site visit (Attachment B) indicated a relatively rural setting with very few structures located within both the direct and indirect APE. In addition, none of these structures appeared to be older than 50 years suggesting a low probability of identifying any NRHP-eligible historic structures within the indirect APE. Also, given the rural setting, that the solar panels will be constructed to conform to the contours of the landscape, and that the disturbed ground will be re-vegetated to its



previous state, impacts to the overall surrounding viewshed are considered to be minimal. No further cultural resources work is recommended for the indirect APE.

This letter report provides the OHPO-requested documentation in order to allow for the OHPO to comment on the Project. The documentation in this letter has identified that the Project should not impact any NRHP-eligible cultural resources within both the direct and indirect APE. URS recommends that clearance be granted for the Project without any additional cultural resources work. URS looks forward to consultation with the RUS and the OHPO on this project, and the need, if any, for additional cultural resources consultation and/or work associated with this project. If you have any questions or comments please feel free to contact me by phone at 513-651-3426 or by email at crista_haag@urscorp.com.

Sincerely,

URS Corporation

Crista Haag, MA Senior Archaeologist

Attachments



References

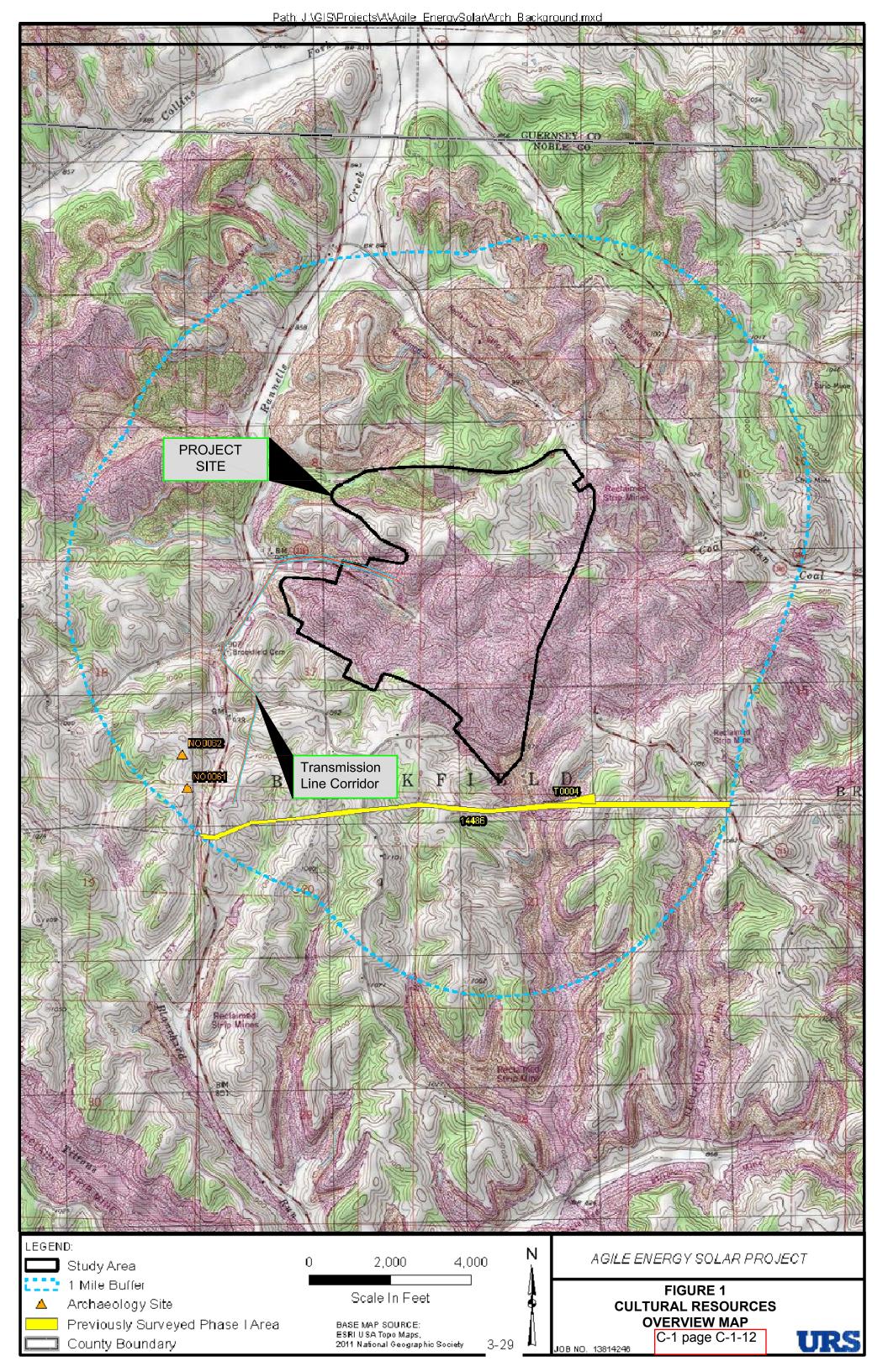
Waters, D.D. and L.E. Roth

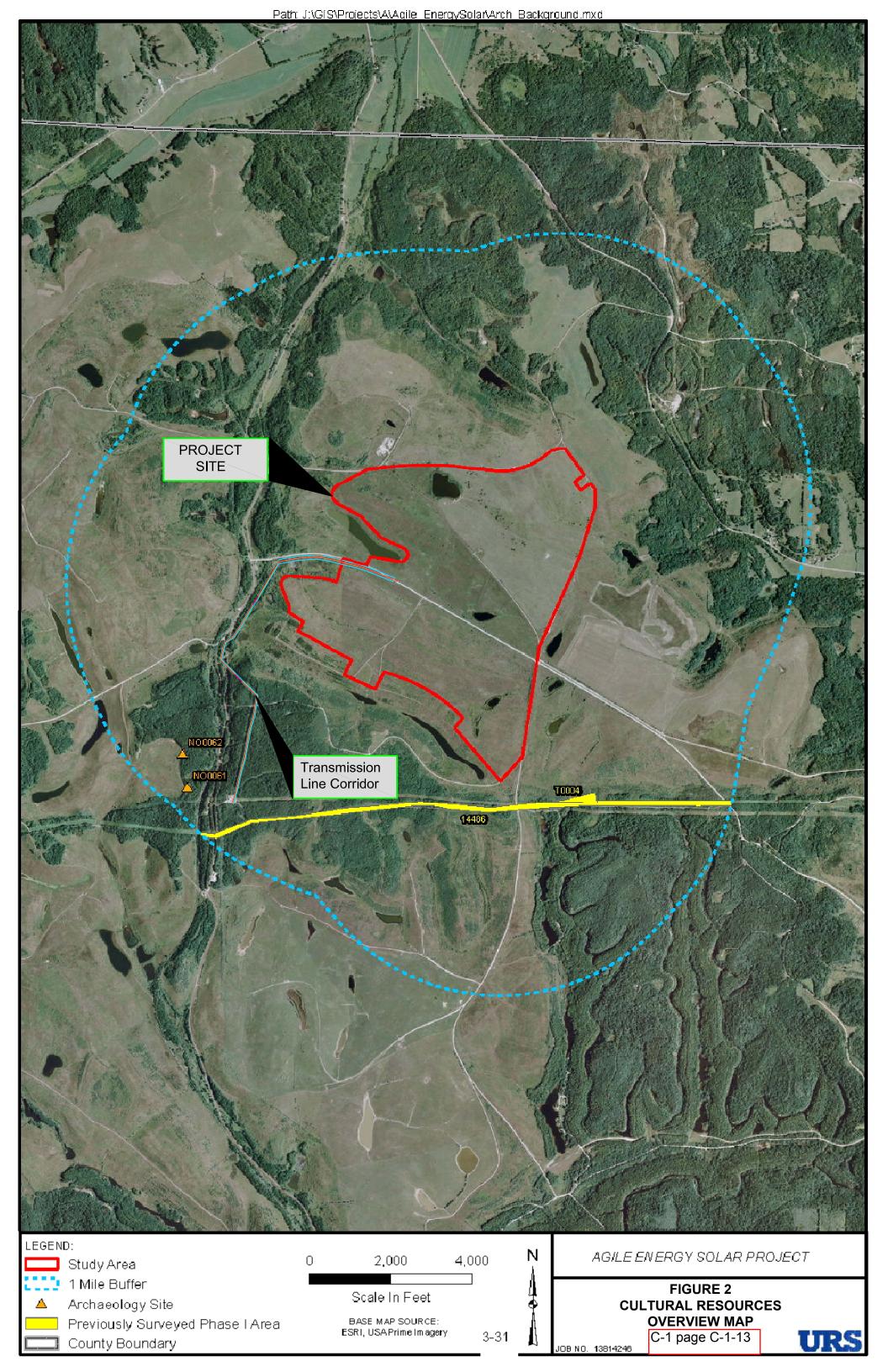
1990 *Soil Survey of Noble County, Ohio.* United States Department of Agriculture, Soil Conservation Service; in cooperation with Ohio Department of Natural Resources, Division of Soil and Water Conservation, and Ohio Agricultural and Research Development Center, Washington, D.C.

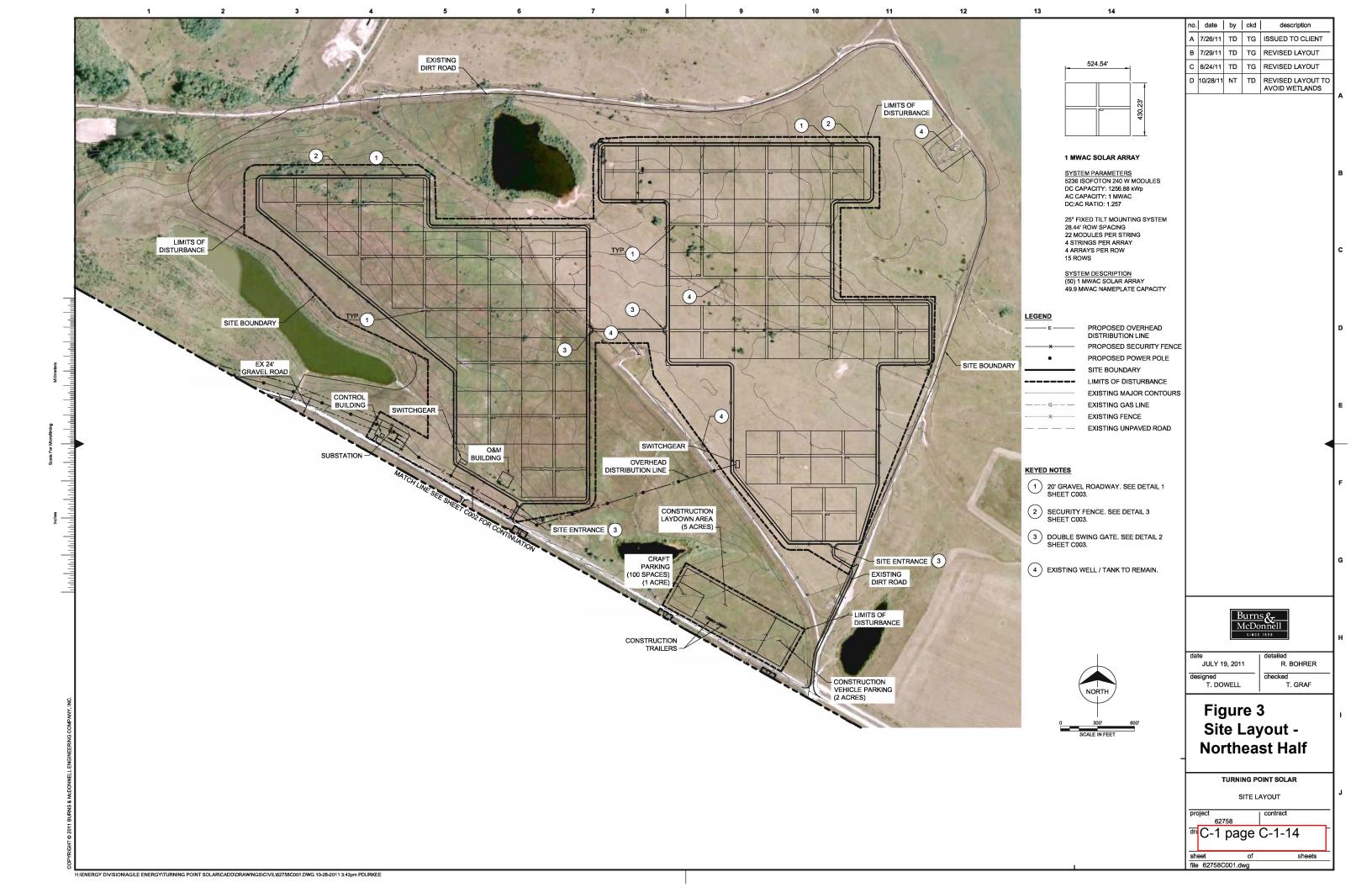


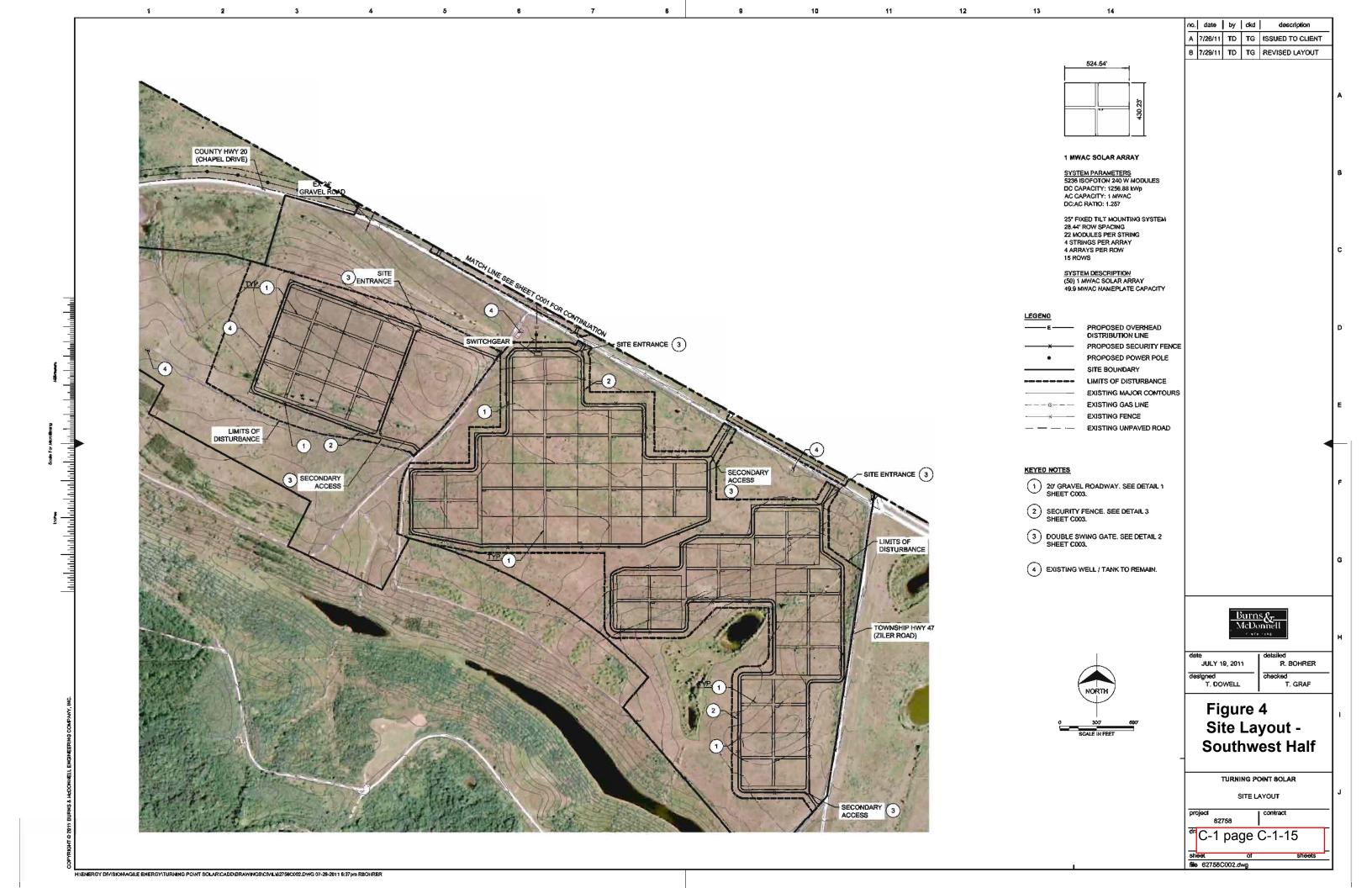
Attachment A

Project Mapping











Attachment B

Project Photography

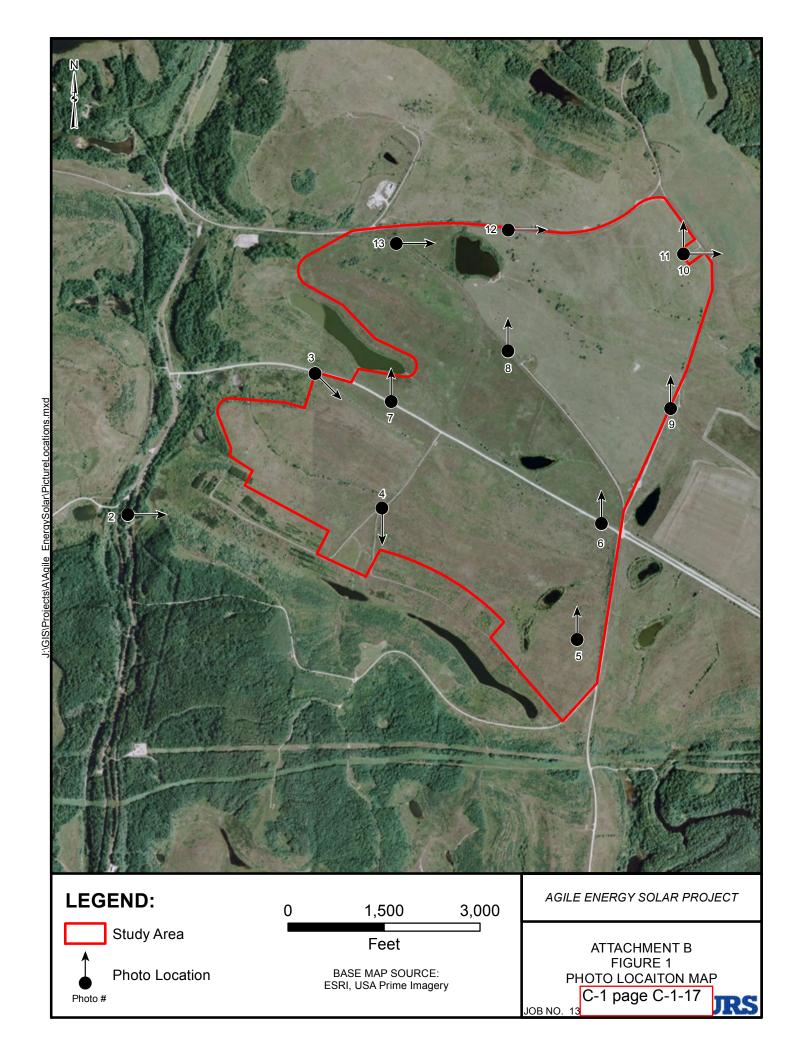




Figure 2. Overview of Brookfield Cemetery.



Figure 3. Example of Oil Wells and Pumps near County Highway 20 (Chapel Drive).



Figure 4. Overview of Southwest Portion of Direct APE.



Figure 5. Overview of Southeast Portion of Direct APE.



Figure 6. Along Chapel Drive, Eastern Edge, facing North.



Figure 7. Along Chapel Drive, Western Edge, facing North.



Figure 8. Overview of Northern Portion of Direct APE.



Figure 9. Along Unnamed Gravel Field Road, facing North.



Figure 10. Example of Oil Wells in Northeast Corner of Direct APE.



Figure 11. Example of Oil Well Pad and Pump in Northeast Corner of Direct APE.



Figure 12. Overview of Northern Portion of Direct APE.



Figure 13. Overview of Northern Portion of the Project.



Attachment C

Historic Topographic and Aerial Photograph Reports

Agile Energy Site

Route 83 & Co. Road 20 Caldwell, OH 43724

Inquiry Number: 2973866.4

January 25, 2011

EDR Historical Topographic Map Report

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EDR Historical Topographic Map Report

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TARGET QUAD

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MAP YEAR: 1911

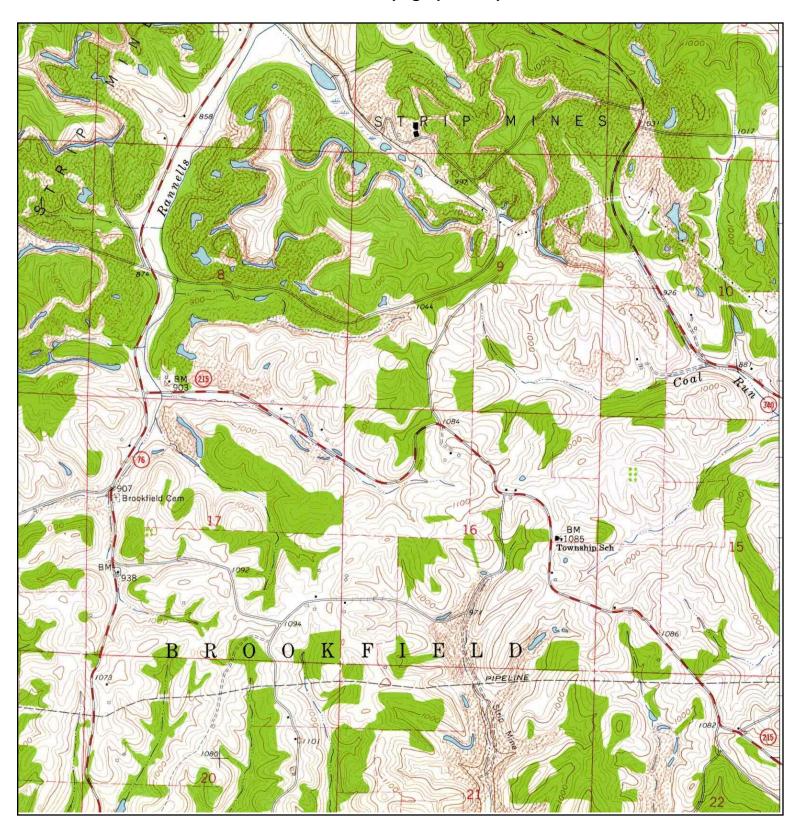
SERIES: 15 SCALE: 1:62500 SITE NAME: Agile Energy Site

ADDRESS: Route 83 & Co. Road 20

Caldwell, OH 43724

LAT/LONG: 39.8111 / -81.6531

CLIENT: URS Corporation
CONTACT: Jennifer Shepard
INQUIRY#: 2973866.4
RESEARCH DATE: 01/25/2011





TARGET QUAD

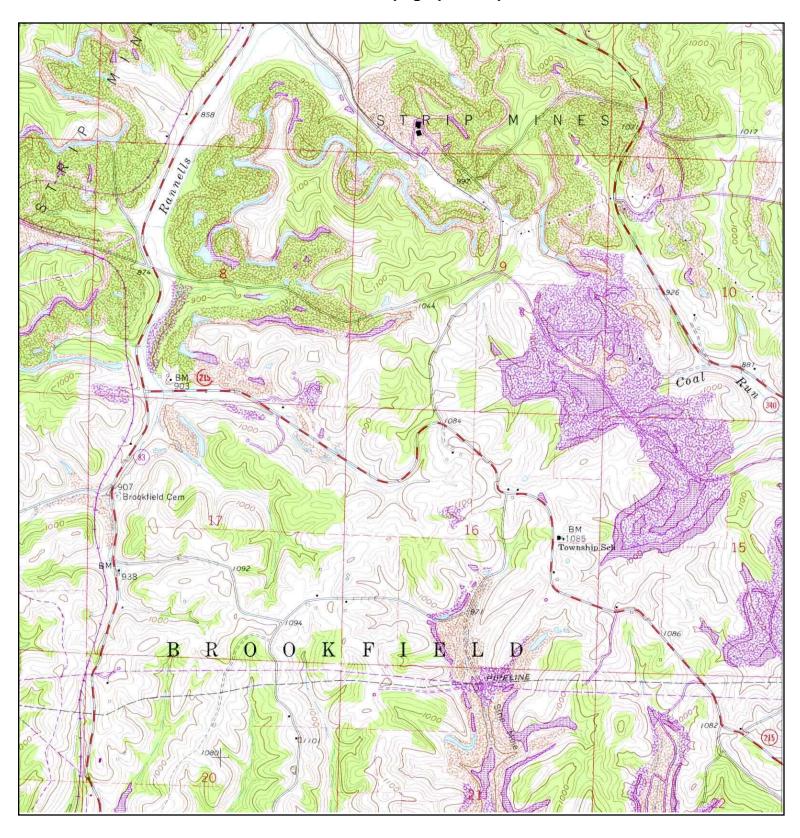
NAME: CUMBERLAND

MAP YEAR: 1961

SERIES: 7.5 SCALE: 1:24000 SITE NAME: Agile Energy Site

ADDRESS: Route 83 & Co. Road 20

Caldwell, OH 43724 LAT/LONG: 39.8111 / -81.6531 CLIENT: URS Corporation CONTACT: Jennifer Shepard INQUIRY#: 2973866.4 RESEARCH DATE: 01/25/2011





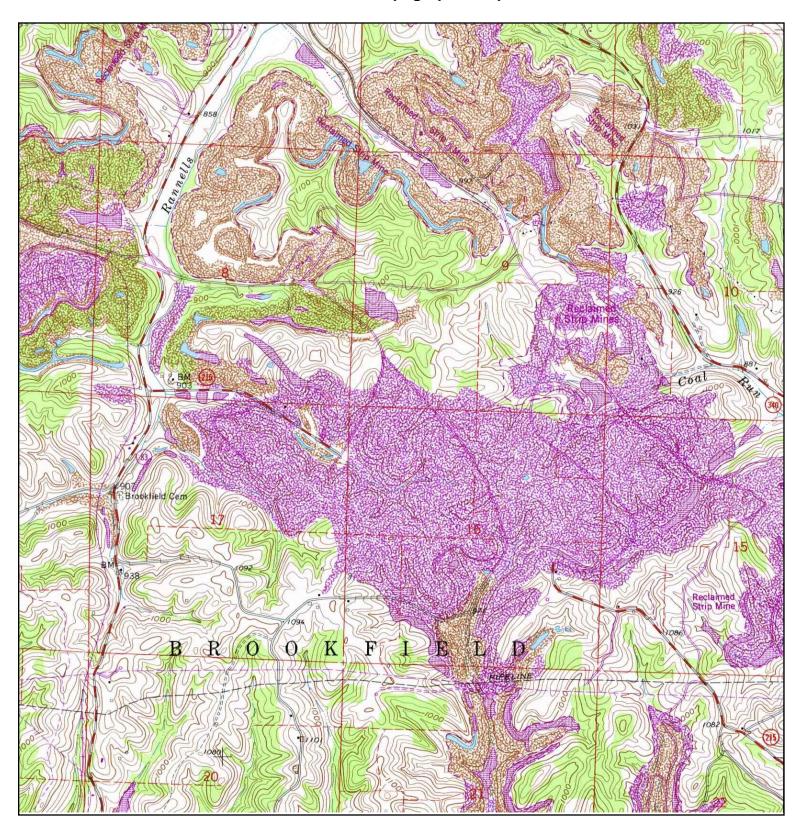
TARGET QUAD

NAME: CUMBERLAND MAP YEAR: 1975 PHOTOREVISED:1961

SERIES: 7.5 SCALE: 1:24000 SITE NAME: Agile Energy Site

ADDRESS: Route 83 & Co. Road 20

Caldwell, OH 43724 LAT/LONG: 39.8111 / -81.6531 CLIENT: URS Corporation
CONTACT: Jennifer Shepard
INQUIRY#: 2973866.4
RESEARCH DATE: 01/25/2011



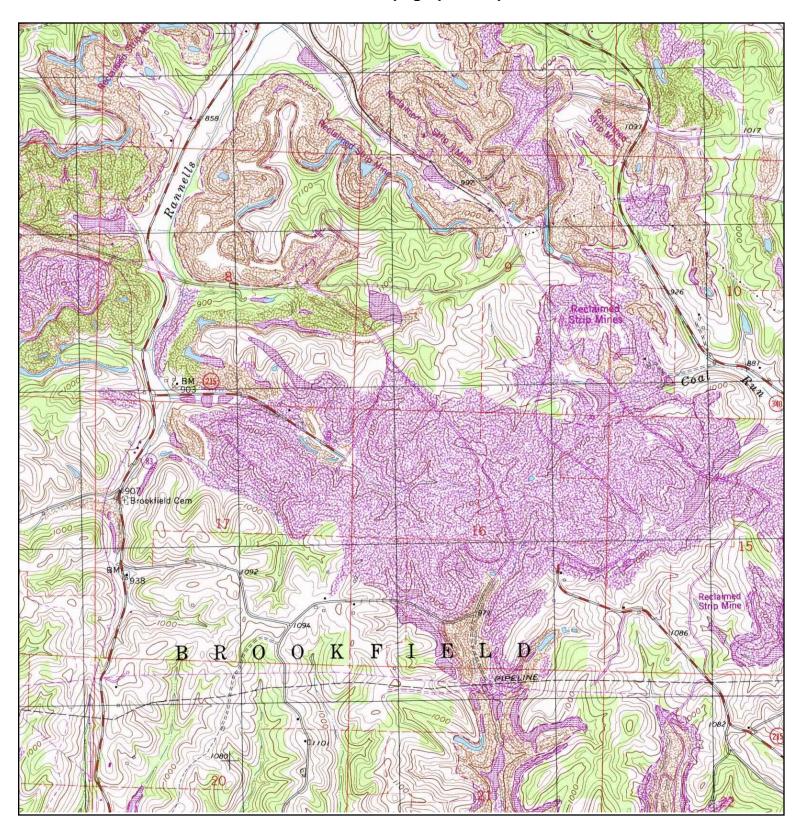


TARGET QUAD

NAME: CUMBERLAND MAP YEAR: 1987 PHOTOREVISED:1961 SERIES: 7.5

SERIES: 7.5 SCALE: 1:24000 SITE NAME: Agile Energy Site
ADDRESS: Route 83 & Co. Road 20

Caldwell, OH 43724 LAT/LONG: 39.8111 / -81.6531 CLIENT: URS Corporation CONTACT: Jennifer Shepard INQUIRY#: 2973866.4 RESEARCH DATE: 01/25/2011





TARGET QUAD

NAME: CUMBERLAND

MAP YEAR: 1994

SERIES: 7.5 SCALE: 1:24000 SITE NAME: Agile Energy Site

ADDRESS: Route 83 & Co. Road 20

Caldwell, OH 43724 LAT/LONG: 39.8111 / -81.6531 CLIENT: URS Corporation
CONTACT: Jennifer Shepard
INQUIRY#: 2973866.4
RESEARCH DATE: 01/25/2011

Agile Energy Site

Route 83 & Co. Road 20 Caldwell, OH 43724

Inquiry Number: 2973866.5

January 25, 2011

The EDR Aerial Photo Decade Package



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EDR Aerial Photo Decade Package

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Date EDR Searched Historical Sources:

Aerial Photography January 25, 2011

Target Property:

Route 83 & Co. Road 20 Caldwell, OH 43724

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
1960	Aerial Photograph. Scale: 1"=750'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: April 12, 1960	EDR
1975	Aerial Photograph. Scale: 1"=1000'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: May 02, 1975	EDR
1984	Aerial Photograph. Scale: 1"=1000'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: April 11, 1984	EDR
1989	Aerial Photograph. Scale: 1"=750'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: April 20, 1989	EDR
1994	Aerial Photograph. Scale: 1"=750'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: April 14, 1994	EDR
2000	Aerial Photograph. Scale: 1"=750'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: October 12, 2000	EDR
2005	Aerial Photograph. Scale: 1"=604'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: January 01, 200	5EDR
2006	Aerial Photograph. Scale: 1"=604'	Panel #: 39081-G6, Cumberland, OH;/Flight Date: January 01, 200	6EDR

