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Apr 11 2023

NC DOA
Department of Administration

Roy Cooper
Governor

Pamela B. Cashwell
Secretary

April 3, 2023

Shonta Dunston
North Carolina Department of Commerce
Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

Re: SCH File # 21-E-4600-0750 Application of Gaston Green Acres Solar, LLC for Certificate to construct a 300 MW Solar Facility in Northampton Co. Docket # EMP-112 Sub 0. View document at http://starw1.ncuc.net/NCUC/portal/ncuc/page/Dockects/portal.aspx, Type EMP-112 Sub 0 in the Docket Number search line.

Dear Shonta Dunston:

The above referenced environmental impact information has been reviewed through the State Clearinghouse under the provisions of the North Carolina Environmental Policy Act.

Attached to this letter are additional comments made in the review of this document. Because of the nature of the comments, it has been determined that no further State Clearinghouse review action on your part is needed for compliance with the North Carolina Environmental Policy Act. The attached comments should be taken into consideration in project development.

If you have any questions, please do not hesitate to contact me at (984) 236-0000.

Sincerely,

CRYSTAL BEST
State Environmental Review Clearinghouse

Attachments

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North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office
Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary D. Reid Wilson

Office of Archives and History
Deputy Secretary, Darin J. Waters, Ph.D.

March 27, 2023

Lauren Minford
PaleoWest Archaeology
916 East Park Avenue
Tallahassee, FL 32301

lminford@paleowest.com

Re: Phase I archaeological survey and GPR survey report for the proposed Cherry Solar Facility, 922 & 1315 Oak Grove Church Road, 105 Crossvine Lane, and 610 Cherry Tree Road, Gaston, Northampton County, ER 20-2522

Dear Ms. Minford:

Thank you for your submittal of February 6, 2023, transmitting the draft of the above-referenced report. We have reviewed the information provided and offer the following comments.

PaleoWest Archaeology (PaleoWest) conducted a Phase I archaeological survey for SunEnergy1 LLC (SunEnergy) for the proposed Cherry Solar Farm on approximately 1,425 acres. The archaeological survey resulted in revisits of four previously recorded sites (31NP438, 31NP439, 31NP442, and 31NP446) and documentation of 98 new sites (31NP474-31NP571), including two cemeteries (31NP565 and 31NP566).

Ninety-five of the sites (31NP438, 31NP446, 31NP474–31NP495, 31NP497–31NP522, 31NP524–31NP529, 31NP531–31NP540, 31NP542–31NP554, and 31NP556–31NP571) were fully delineated within the project area and PaleoWest recommends that all 95 are not eligible for listing in the National Register of Historic Places (NRHP) and that no further archaeological investigations are necessary.

Seven resources (31NP439, 31NP442, 31NP496, 31NP523, 31NP530, 31NP541, and 31NP555) could not be fully delineated within the project area and are recommended as "Unassessed." Given that the investigated portions of 31NP439, 31NP442, 31NP496, 31NP523, 31NP530, 31NP541, or 31NP555 within the project area are recommended as not eligible, PaleoWest recommends that no further work is necessary at these seven sites.

Of the six locations initially thought to be potential cemeteries, four were determined not to be associated with historic cemeteries. Ground Penetrating Radar (GPR) was conducted by Seramur & Associates, PC to determine boundaries for each of the two cemeteries (31NP565 and 31NP566). The results of the GPR survey indicated the presence of multiple anomalies at each site that are consistent with unmarked burials. PaleoWest recommends a 10-meter avoidance buffer around each. An additional cemetery reportedly located within the APE and identified as the Valentine Cemetery was not located. PaleoWest recommends

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that SunEnergy1 consult with OSA prior to ground-disturbing activities on this parcel to establish protocols ahead of any unanticipated discoveries associated with the Valentine cemetery.

We concur with PaleoWest's findings and recommendations for all sites, and we commend PaleoWest on its well-presented and comprehensive report.

We ask that PaleoWest revise the report with the following corrections and edits:

- The Contents section needs to be reformatted to fix numbering inconsistencies with the Appendices and Figures (pg. ix).

- At several places within the report, figure captions are separated from their images on the subsequent page.

- The description of the PPK recovered from 31PN476 does not match the type-description for Halifax side-notched points (see Daniel 2021). No picture was provided, but corner notched types usually fall under the Kirk or Palmer types (Early Archaic). Please include a photo, if possible.

- The "Fountain Creek" point identified from 31NP558 is not a recognized NC type and no reference or photo was provided for identification. The point description sounds similar to a Palmer corner-notched. Please provide either a reference to this point type or change the identification. Please include a photo, if possible.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or environmental.review@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

Renee Gledhill-Earley

for Ramona Bartos, Deputy
State Historic Preservation Officer

cc: Derek Ivie, SunEnergyl derek.ivie@sunenergy1.com
Nick Tillson, SunEnergyl nick.tillson@sunenergy1.com