



STATE OF NORTH CAROLINA
DEPARTMENT OF ADMINISTRATION

ROY COOPER
GOVERNOR

MACHELLE SANDERS
SECRETARY

May 6, 2020

Ms. Kimberley Campbell
North Carolina Department of Commerce
Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: SCH File # 20-E-4600-0210; Application of American Beech Solar, LLC for Certificate to construct a 110 MW Solar Facility in Halifax Co. Docket #EMP-108, Sub 0.

Dear Ms. Campbell:

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

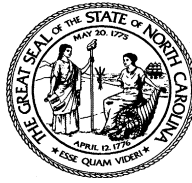
Attached to this letter are **additional comments** made in the review of this document. The attached comments should be taken into consideration in project development.

Sincerely,

A handwritten signature in cursive script that reads "Crystal Best".

Crystal Best
State Environmental Review Clearinghouse

Attachments
cc: Region L



**North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary Susi H. Hamilton

Office of Archives and History
Deputy Secretary Kevin Cherry

April 28, 2020

Whitney Rubin
BayWa Solar Projects, LLC
17901 Von Karman Avenue, Suite 1050
Irvine, CA 92614

Whitney.rubin@baywa-re.com

Re: Archaeological Survey, Proposed American Beech 1 And 2 Solar Farm, Halifax County,
ER 19-2192

Dear Ms. Rubin:

Thank you for your March 30, 2020, letter transmitting the archaeological report and site forms for the project noted above. We have reviewed this report and offer the following comments.

Forty-one newly recorded archaeological sites (31HX590 – 31HX630) were identified and documented as a result of the survey. Given their poor integrity and research potential, 28 of the newly identified sites in the project area (31HX592 – 31HX594, 31HX597 – 31HX607, 31HX610 – 31HX613, 31HX615, 31HX619, 31HX621, 31HX622, and 31HX625 – 31HX630) are not considered eligible for listing in the National Register of Places. Based on the information provided in the report, we concur with these recommendations.

The 13 remaining sites (31HX590, 31HX591, 31HX595, 31HX596, 31HX608, 31HX609, 31HX614, 31HX616 – 31HX618, 31HX620, 31HX623, and 31HX624) likely extend beyond the surveyed project area. Since these sites have not been completely delineated, they cannot be assessed with regard to their eligibility for listing in the National Register. However, it is the opinion of Commonwealth Heritage Group that the portions of these sites within the project area are unlikely to contribute to their National Register eligibility, and no further work is recommended in these areas. We concur with these recommendations.

For the current report to comply with Office of State Archaeology (OSA) Standards and Guidelines https://files.nc.gov/dncr-arch/OSA_Guidelines_Dec2017.pdf, we request that you revise the report before resubmittal so that it contains the following information:

- Explanation of how artifacts were analyzed, including information such as the classification or typological schemes that were used to describe different artifact types (OSA Guidelines p. 24)
- Clarification with regard to whether Figure 4.3-13 depicts soils at site 31HX591 (as indicated in the caption) or site 31HX592 (as indicated in text of the site description on page 4-20)

In addition, we note that the report does not contain information on the location where the curated collection will be housed. OSA Standards and Guidelines state that "All materials...recovered and created for purposes of compliance with state and federal regulations shall be permanently curated in an approved archaeological repository, preferably in the state of North Carolina" (OSA Guidelines p. 19). These guidelines are intended to allow for transparency of process, access to materials by future researchers, and compliance with federal regulations. Please consult with Commonwealth Heritage Group regarding curation of the collection. The revised report should include information regarding the location where the collection will be housed.

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,



 Ramona Bartos, Deputy
State Historic Preservation Officer

cc: Susan Bamann, Commonwealth Heritage Group
Crystal Best, North Carolina State Clearinghouse

susanbamann@chg-inc.com
crystal.best@doa.nc.gov