#### Stantec Consulting Services Inc. 12075 Corporate Parkway, Mequon, WI 53092



August 25, 2020

File: Bellflower Solar Project

Reference: Confidential: Cultural Resource Database Review for the Bellflower Solar Project, Henry and Rush Counties, Indiana

Attention: Mr. Vince Green, Senior Manager, Development

Lightsource BP

vincent.green@lightsourcebp.com

Dear Mr. Green,

Lightsource Renewable Energy North America is proposing to develop and construct the Bellflower Solar Project (the Project) near New Castle, Indiana. The Project includes the development of an approximately 152.5 megawatt AC utility scale solar energy generation facility. In addition to photovoltaic modules, the Project will also include single access trackers, inverters, electrical collection system, access roads, a substation, and perimeter security fencing in Sections 3, 4, and 9 of Township 15 North, Range 10 East (Rush County) and Sections 33 and 34 of Township 16 North, Range 10 East (Henry County) in Henry and Rush Counties, Indiana (Figure 1). The total Project Area is 1,305 acres.

### INTRODUCTION AND METHODOLOGY

On August 7 and 10, 2020, Stantec Consulting Services Inc. (Stantec) performed a cultural resource review of the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) for registered historic structures, archaeological sites, cemeteries, and other cultural resources within the Project Area, which is defined as the Area of Potential Effects (APE) for direct effects and a 1-mile buffer surrounding the APE for indirect effects. SHAARD is the official Indiana database of known historic resources (structures, archaeological sites, and cemeteries greater than 50 years of age and reported by professionals or the public) maintained by the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (DHPA). The review was conducted to provide an initial cultural resources assessment of the Project and determine if additional cultural resources investigations would be required under Indiana Code (IC) 14-21-1, which provides for review and comment by Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (DHPA) staff on potential effects of federal or state undertakings, including the granting of permits to private entities. Further, under IC 14-21-1-26.5, ground within 100 feet of a burial ground or cemetery cannot be disturbed for the purpose of erecting, altering, or repairing a structure without having a plan approved by DHPA. If federal permitting is found to be required for the Project, the Indiana State Historic Preservation Office will review the Project under Section 106 of the National Historic Preservation Act of 1966, as amended.

# **RESULTS**

Figure 2 presents the results of the SHAARD review with the locations of cataloged historic structures within 0.5-mile of the Project APE and archaeological sites within the Project APE depicted. Historic structures located between 0.5 and 1 mile from the Project APE are documented in the Tables 1 and 2 and within the text, but are not depicted in Figure 2. No archaeological sites have been identified within the

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Project APE, however 39 are registered within the 1-mile buffer of the Project APE. One prehistoric burial site (also recorded as an archaeological site) has been recorded within 1 mile of the Project APE. Two cemeteries dating to the 1830s and 1840s are recorded within the 1-mile buffer. One historic structure is recorded in SHAARD within the Project APE, and another 21 within the 1-mile buffer. Further discussion of the resources identified in SHAARD are provided below.

### **ARCHAEOLOGICAL SITES**

No archaeological sites are located within the Project APE (Table 1 and Figure 2). The closest site recorded to the Project APE is 12HN0036\_R1, which is 1,180 feet to the east. The other 38 recorded archaeological sites are more than 1,900 feet from the Project APE. The sites are mainly unidentified prehistoric lithic scatters, but also include Archaic and Woodland period scatters, isolated finds, and a cemetery (see *Prehistoric Burial Sites* below). Three sites have been recommended as potential eligible for listing in the National Register of Historic Places (NRHP), 14 as indeterminate, and 19 as ineligible. Three sites have no data regarding NRHP eligibility.

### **PREHISTORIC BURIAL SITES**

No prehistoric or historic Indian burial sites are located within the Project APE (Table 1 and Figure 2). One unidentified prehistoric cemetery, CR-70-19 (also recorded as 12RU0470), is 1,500 feet to the southwest of the Project APE. According to the site form, this site was reported by a collector who identified it during an earthmoving gravel operation. No other details are known.

# HISTORICAL/ACTIVE CEMETERIES

No Historic period or active cemeteries are located within the Project APE. However, the Shiloh Cemetery is immediately adjacent to the southwest corner of the Project APE (Table 2 and Figure 2). One cemetery is recorded in SHAARD as both the Dunreith Cemetery and as the Dunreith/Liberty Baptist/Christian Cemetery. It is located on the south side of the Town of Dunreith, nearly 4,000 feet north of the northern boundary of the Project APE.

#### HISTORIC STRUCTURES

One historic structure (139-176-05001) is recorded in SHAARD within the Project APE, and another 21 are within the 1-mile buffer (Table 2 and Figure 2). The structure within the Project APE, is a two-story American Foursquare farmhouse that dates to around 1925. The structure is described as a Contributing Element if a Historic District would be created (contributing elements are defined as any building, object, or structure which adds to the historical integrity or architectural qualities that make the historic district, listed locally or federally, significant). The other 21 structures within 1 mile of the Project APE include houses, farms, commercial buildings, and the site of a former school. All except one are described as potential Contributing Elements. The one exception, 065-176-60047, is a farm with an 1865 Italianate two-story I-House and outbuildings that is described as Notable. Additional research is needed to determine whether this feature is eligible for listing on the NRHP. The closest of these 21 structures to the Project APE, 065-176-55051, is 530 feet to the east. The remaining 14 cataloged historic structures are more than 0.5 mile from the Project APE.

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#### CONCLUSION AND RECOMMENDATIONS

There are no known archaeological sites within the Project APE where direct effects would be anticipated. An additional 39 archaeological sites are located 1 mile from the Project APE, however those sites would not be impacted by the Project design.

One historical structure is present within the Project APE for direct effects, however Project infrastructure has been sited to avoid this feature so no direct effects are anticipated. An additional seven structures, six of which are characterized as potential Contributing Elements to an Historic District, are within 0.5-mile of the Project APE for direct effects. Dependent on siting of Project elements (solar panels, transmission lines, and substations, or similar), topography, and screening by existing landscape features (principally tree lines and other structures), the Project could have an adverse visual effect on these resources. As the seven structural resources within or within 0.5 mile of the Project APE for direct effects are listed as a Contributing Elements, these resources should be assumed to be eligible for listing in the NRHP. There are 14 historical structures within the between 0.5- and 1-mile of the Project APE for direct effects, all of which are described as potential Contributing Elements and as such should be assumed to be eligible for listing in the NRHP. While an APE for indirect effects has not been determined for this Project, an APE for indirect effects is unlikely to exceed the 1-mile buffer used in this review.

Under IC 14-21-1-26.5, ground within 100 feet of a burial ground or cemetery cannot be disturbed for the purpose of erecting, altering, or repairing a structure without having a plan approved by DHPA. There are no cemeteries or Native American burial sites located within the Project APE for direct effects. All but one cemetery or burial site is located 1,500 feet from the Project APE. The exception is the Shiloh Cemetery (139-176-05003; CR-70-18), which is separated from the Project APE by a township road.

Issuance of state permits is likely to require review of the Bellflower Solar Project by DHPS staff pursuant to IC 14-21-1 and 14-21-1-26.5. Additional field survey for archaeological resources, historic structures, and cemeteries and burial sites may be required to comply with IC 14-21-1 and 14-21-1-26.5. While currently unanticipated, if the Project has a federal nexus, the Indiana State Historic Preservation Office will review the Project under Section 106 of the National Historic Preservation Act of 1966, as amended. Additional field survey for archaeological resources, historic structures, and cemeteries and burial sites may be required to comply with Section 106.

Other historical properties and archaeological sites may be present in or near the Project APE but have not been discovered or reported to the DHPA. Further investigation may be necessary to comply with the local, state, or federal laws and regulations.

Regards,

**Stantec Consulting Services Inc.** 

**Paul Kreisa** 

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Table 1. Archaeological sites and cemeteries recorded in the SHAARD database within 1 mile of the Project APE.

Site Number	Culture/Age	Description	NRHP Status	Distance from APE
12HN0045	Woodland	Mound	Unstated	3,400 ft N
12HN0036_R1	None	None: appears to be a mis- mapped site per SHAARD	Unstated	1,180 ft E
12HN-0078	Archaic	Camp	Unstated	4,660 ft NW
12RU0588	Unidentified Prehistoric	Isolated unifacial scraper	Recommended Ineligible	2,680 ft S
12RU0458	Unidentified Prehistoric	Lithic Scatter	Indeterminate	4,600 ft E
12RU0457	Unidentified Prehistoric	Lithic Scatter	Indeterminate	4,350 ft ESE
12RU0468	Unidentified Prehistoric	Lithic Scatter	Indeterminate	1,970 ft S
12RU0469	Unidentified Prehistoric	Lithic Scatter	Indeterminate	2,070 ft S
12RU0470/ CR-70-19	Unidentified Prehistoric	Cemetery	Indeterminate	1,500 ft SW
12RU0481	Unidentified Prehistoric	Lithic Scatter	Indeterminate	3,110 ft W
12RU0480	Unidentified Prehistoric	Lithic Scatter	Indeterminate	4,260 NW
12RU0531	Early and Late Archaic	Lithic Scatter	Potentially Eligible	4,930 ft W
12RU0532	Early and Late Archaic Early & Terminal Middle Woodland	Lithic Scatter	Potentially Eligible	4,250 ft W
12RU0534	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	4,200 ft WNW
12RU0478	Unidentified Prehistoric	Lithic Scatter	Indeterminate	3,830 ft WNW
12RU0475	Unidentified Prehistoric	Lithic Scatter	Indeterminate	3,180 ft W
12RU0474	Unidentified Prehistoric	Lithic Scatter	Indeterminate	3,440 ft W
12RU0471	Unidentified Prehistoric	Lithic Scatter	Indeterminate	2,020 ft W
12RU0476	Unidentified Prehistoric	Lithic Scatter	Indeterminate	2,550 ft W
12RU0479	Middle Archaic	Lithic Scatter	Recommended Ineligible	4,720 ft W
12RU0533	Unidentified Prehistoric	Lithic Scatter	Recommended Ineligible	4,820 ft W
12RU0477	Unidentified Prehistoric	Lithic Scatter	Recommended Ineligible	4,680 ft W
12RU0535	Early Archaic (Jerger Phase)	Lithic Scatter	Recommended Ineligible	4,390 ft W
12RU0473	Unidentified Prehistoric	Lithic Scatter	Indeterminate	4,650 ft W
12RU0472	Unidentified Prehistoric	Lithic Scatter	Indeterminate	3,540 ft W
12RU0372	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	3,980 ft W
12RU0374	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	3,480 ft W
12RU0373	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	3,340 ft W
12RU0371	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	3,370 ft W
12RU0370	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	2,770 ft W

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Site Number	Culture/Age	Description	NRHP Status	Distance from APE
12RU0369	Early Archaic (Jerger Phase)	Isolated Thebes point	Recommended Ineligible	2,810 ft W
12RU0368	Early Archaic (Jerger Phase)	Isolated Thebes cluster point	Recommended Ineligible	2,850 ft W
12RU0367	Late Archaic	Isolated Brewerton Corner Notched point	Recommended Ineligible	2,770 ft W
12RU0365	Unidentified Prehistoric	Isolated unmodified flake	Recommended Ineligible	2,830 ft W
12RU0366	Unidentified Prehistoric	Lithic Scatter	Recommended Ineligible	3,640 ft W
12RU0364	19th – 20th Century Historic Unidentified Prehistoric	Farmstead historic scatter Lithic scatter	Potentially Eligible	3,590 ft W
12RU0362	Early Archaic (Jerger Phase)	Lithic Scatter	Recommended Ineligible	4,220 ft W
12RU0361	Unidentified Prehistoric	Lithic Scatter	Recommended Ineligible	5,230 ft W
12RU0363	Unidentified Prehistoric	Lithic Scatter	Recommended Ineligible	5,170 ft W

Table 2. Historic sites and cemeteries recorded in the SHAARD database within 1 mile of the Project APE

SHARD Number	Resource Name	Details	Significance Rating	Distance from APE
065-176-60047	Farm	Italianate 2-story I-House (1865) with outbuildings	Notable	2,010 ft NW
065-176-55040	Farm	1.5-story Bungalow (1920) with outbuildings	Contributing	3,700 ft N
065-176-55041	House	2-story Queen Anne (1905)	Contributing	2,830 N
065-176-55051	Farm	1-story Bungalow (1925) with outbuildings	Contributing	530 ft E
139-176-05001	Farm	2-story American Foursquare (c. 1925)	Contributing	Within
139-176-05002	MacFarland-Hiner Farm	2-story American Foursquare (1916)	Contributing	1,400 ft E
139-176-05004	Huddleson Farm	Bank Barn and Transverse frame barn	Contributing	1,220 ft S
139-176-05003 CR-70-18	Shiloh Cemetery	Cemetery dating back to 1830s	Contributing	Adjacent to SW
139-176-00006	Site of Martin School	Granite Boulder/Water Pump (1857-1906)	Contributing	3,780 ft E
139-176-00007	Lord Farm	1-story farmhouse (c. 1915) with outbuildings	Contributing	3,820 ft SSE
139-176-00008	John Poppoon Farm	2-story T-plan (c. 1885) with outbuildings	Contributing	4,550 ft SE
139-176-05005	House	1-story Craftsman Bungalow	Contributing	3,190 ft S
139-176-05006	Albert Kirkham Farm	1.5-story house (1919) with outbuildings	Contributing	4,810 ft S
139-176-05007	R. Smiley Farm	1.5-story Hall and Parlor house (c. 1880)	Contributing	5,250 ft W
065-176-62008	Liberty Baptist Cemetery	Active cemetery dating back to 1840	Contributing	3,960 ft W

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SHARD Number	Resource Name	Details	Significance Rating	Distance from APE
065-176-62005	Dunreith Cemetery	Active cemetery dating back to 1834	Contributing	3,960 ft W
065-176-62006	Commercial Building	2-story Vernacular Commercial Building (1880)	Contributing	3,220 ft WNW
065-176-62007	Commercial Building	2-story Vernacular Commercial Building (1880)	Contributing	3,450 ft WNW
065-176-62005	Commercial Building	2-story Vernacular Commercial Building (1924)	Contributing	3,440 ft WNW
065-176-62004	House	1.5-story Hall and Parlor house (c. 1870)	Contributing	3,300 ft NW
065-176-62003	Dunreith Christian Church	1-story Gothic Revival church (1909)	Contributing	4,070 ft NW
065-176-62002	House	1-story Gabled Ell house (1900)	Contributing	4,000 ft NW
065-176-62001	Dunreith School	1-story Vernacular T-shaped school (1908)	Contributing	4,070 ft NW



