

400 West Summit Hill Drive, Knoxville, Tennessee 37902

April 6, 2022

Mr. Craig Potts
State Historic Preservation Officer
and Executive Director
Kentucky Heritage Council
300 Washington Street
Frankfort, Kentucky 40601

Dear Mr. Potts:

TENNESSEE VALLEY AUTHORITY (TVA), POWER PURCHASE AGREEMENT (PPA), RUSSELLVILLE, LOGAN COUNTY, KENTUCKY-- ARCHITECTURAL SURVEY (36.765588, -86.975550) (TVA TRACKING NUMBER – CID 79976)

In a letter dated April 16, 2021, TVA initiated consultation with your office regarding TVA's proposal to enter into a 20-year PPA with Silicon Ranch Russellville LLC (SR Russellville), a subsidiary of Silicon Ranch Corporation (SRC) to purchase the electric power generated by a proposed solar photovoltaic (PV) facility in Logan County, Kentucky. The proposed PV facility would be owned by SRC and operated by SR Russellville and would have an installed capacity of 173 megawatts (MWs). The PV facility would connect to TVA's adjacent existing Springfield-Logan Aluminum 161-kilovolt (kV) transmission line (TL.) The proposed solar facility would occupy portions of ten individual tracts of land in Logan County, approximately two miles southwest of Russellville, Kentucky, totaling approximately 1,639 acres. The preliminary layout is depicted in the attached map.

TVA determined, in consultation, the area of potential effects (APE) to be the area of proposed ground-disturbance, where physical effects could occur including the silicon PV panels and associated infrastructure including several medium voltage transformers, one or two main power transformers, a substation and battery energy storage system, internal site access roads, and all associated cabling and safety equipment. The APE also includes areas within a half-mile radius of the project within which the project would be visible, where visual effects on above-ground resources could occur.

SRC contracted with New South Associates, Inc. (NSA) to conduct a phase I cultural resources survey. In order to obtain maximum flexibility in design, and to avoid both cultural and environmental resources, the archaeological survey included the entire 1,639 acres. The results and recommendations of the architectural survey can be downloaded. TVA will provide a separate consultation letter discussing the results of the archaeological survey.

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The historic architectural survey identified 26 historic architectural resources within the APE, including 12 residences (LO96, LO307, LO308, LO309, LO310, LO311, LO313, LO314, LO319, LO320, LO321, LO322), 10 farms (LO95, LO245, LO304, LO305, LO306, LO315, LO 323, LO 324, LO 325, and LO 326), a restaurant (LO317), a railroad corridor (LO316), 1 road (LO318) and 1 cemetery (LO312).

Two resources are located entirely within the project area (LO245 and LO325) and one resource is located partially within the project area (LO315). NSA recommends site LO325 and LO315 ineligible for the National Register of Historic Places (NHRP) based on lack of integrity and/or inability to associate the resources with important historical person(s) or event(s). Site LO245, Brown Farm, was designated in 2007 a Kentucky Historic Landmark. None of the original associated outbuildings remain. The farm was subdivided over the years for construction of other dwellings, most dating from the mid-twentieth century. NSA recommends that due to the demolition of the associated agricultural outbuildings, structures, construction of surrounding dwellings, and the several smaller fields merged into one large commercial agriculture field, the Brown Farm no longer retains its integrity of setting, feeling, or association as a farm dating from the early nineteenth century.

Sites LO245 and LO315 also contain cemeteries (Anderson Cemetery associated with LO245 and the Miller Cemetery and Ogden Gravesite associated with LO315). The cemeteries are also discussed in the corresponding archaeological report. NSA recommends these cemeteries are ineligible for the NRHP under criteria A, B, and C. The cemeteries were also evaluated under criterion D as part of the archaeological survey and NSA recommends them as ineligible under this criterion as well. Although the cemeteries are recommended ineligible, they will be avoided by a 20-foot buffer during construction, maintenance, and operation of the site in order to avoid any physical effects and to remain consistent with Kentucky Burial Protection Laws (KRS 525.105, 110, 115, 120; KRS 72.020; 901 KAR 5:090).

Two additional resources identified within the visual APE were previously recorded by Kentucky Heritage Council (LO95 and LO96). One of those resources, site LO95 (Harmony Hall Farm) has been previously determined eligible for listing in the NRHP. NSA recommends that site LO95 remain eligible for listing in the NRHP, with a recommended NRHP boundary of 4.36 acres. Due to the resource's distance from the facility and the fact that the solar facility would be bounded by a visual buffer of evergreen trees around the perimeter, the facility would not be visible from the resource and therefore would have no effect on the resource. NSA recommends site LO96 and the remaining newly identified historic architectural resources within the APE are not eligible for listing in the NRHP, either individually or as part of a district.

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TVA has read the enclosed report and agrees with the recommendations of the authors. TVA finds that the proposed undertaking would have no effect to historic properties.

Pursuant to 36 CFR Part 800.4(d)(1) we are notifying you of TVA's finding of no historic architectural properties affected; providing the documentation specified in § 800.11(d); and inviting you to review the finding. Also, we are seeking your agreement with TVA's eligibility determinations and finding that the undertaking as currently planned will have no effects on historic architectural properties.

Please contact Michaelyn Harle by email, <a href="mailto:mharle@tva.gov">mharle@tva.gov</a>, with your comments.

Sincerely,

James W. Osborne, Jr.

200 W. Os\_,

Manager

**Cultural Compliance** 

MSH:ERB Enclosures