



May 7, 2021

In reply, please refer to:
2021-MAH-51118

Rebecca H. Turner
AECOM
525 Vine Street, Suite 1800
Cincinnati, Ohio 45202

RE: Section 106 Review – Phase I Architectural History Survey for the Lincoln Park-Riverbend 138kV Transmission Line Project, Mahoning County, Ohio

Dear Ms. Turner:

This letter is in response to correspondence received on April 9, 2021 regarding both the *Preferred Route* and *Alternate Route* for the above referenced project in the City of Youngstown, Mahoning County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.S. 306108 [36 CFR 800]). The United States Army Corps of Engineers (Corps) is the lead federal agency.

Preferred Route

American Transmission Systems, Inc. (ATSI), a FirstEnergy Company (FirstEnergy), is proposing the construction of 5.21-miles of new 138kV transmission line within the City of Youngstown. As part of this project, ATSI is proposing to install up to 73 new pole locations. The project originates at the existing Lincoln Park Substation and will connect to the existing Riverbend Substation. The following review and comments pertain only to the *Phase I Architectural History Survey for the Lincoln Park-Riverbend 138kV Transmission Line Project, Mahoning County, Ohio* by AECOM (2021). The archaeology component has been submitted in a stand-alone report, therefore the review will be under a separate cover.

A literature review and field survey were completed as part of the investigations. A total of 75 extant aboveground resources fifty years of age or older were identified within the Project's Area of Potential Effects (APE). Of the identified properties, 16 have been previously recorded in the Ohio Historic Inventory (OHI), including one National Register-listed property (NRHP 86001565), four resources previously determined eligible or potentially eligible for NRHP listing (Bridge ID 5058082, MAH0138704, MAH0024304, and MAH0135104), seven previously determined not eligible, and four which have not been formally assessed for eligibility. The remaining 59 properties were newly surveyed and recorded to the OHI. AECOM recommends that none of the 59 newly recorded resources are eligible for NRHP-listing. Our office agrees with AECOM's assessments of eligibility.

Based on the information provided, it is our opinion that the project will have no adverse effect on historic resources. No further coordination in regards to history/architecture properties are required for the *Preferred Route* unless the scope of work changes.

Alternate Route

A literature review report, *Phase I Cultural Resources Desktop Review for the Lincoln Park-Riverbend 138kV Transmission Line Project – Alternate Route, Mahoning County, Ohio* by AECOM (2021) was completed for the entire APE as defined in the aforementioned report. However, as stated in the report, currently the APE does not include any temporary workspaces or access roads, as those work area locations have not been finalized. Based on the results of the literature review and the results of the recent Phase I architectural survey for the *Preferred Route*, which partially overlaps the *Alternate Route*, the SHPO does concur that the *Alternate Route* does have a low potential to adversely affect historic resources. However, due to the unknown use of the *Alternate Route*, the SHPO does recommend further coordination with our office if the *Alternate Route* is chosen. Once our office has received the final design plans, including the temporary workspaces/access roads, we will be able to offer comments on the potential for the *Alternate Route* to affect potentially undocumented architectural resources. If you have any questions concerning this review, please contact me at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,



Joy Williams, Project Reviews Manager
Resource Protection and Review

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

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