



In reply refer to:  
2016-CLA-37051

May 30, 2017

Crista M. Haag, Cultural Resources Specialist  
CH2M HILL, Inc.  
400 East Business Way, Suite 400  
Cincinnati, OH 45241

Re: East Springfield-Tangy 138 kV Loop to Broadview Substation Project, Moorefield Township, Clark County, Ohio

Dear Ms. Haag:

This letter is in response to the report *Phase I Cultural Resources Survey for ATSI's East Springfield-Tangy 138 kV Loop to Broadview Substation Project, Moorefield Township, Clark County, Ohio (2016-CLA-37051)*, received by this office on May 18, 2017. The comments of the State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and Ohio Power Siting Board rules for siting this project (OAC 4906).

This project involves construction by American Transmission Systems, Inc. (ATSI), a FirstEnergy company, of a new 138 kV Transmission line loop from the existing East Springfield-Tangy 138 kV transmission line to the existing Broadview Substation. The proposed line will be 5 miles long and will be located within a 60-foot-wide permanent right-of-way; poles will primarily be wood and will measure between 80 to 100 feet tall. Some steel poles on concrete foundations will also be installed. CH2M HILL, Inc. (CH2M), conducted an archaeological survey of the direct area of potential effects (APE) using both pedestrian survey and subsurface testing methods. CH2M identified four archaeological sites. These include two historic sites (33CL631 and 33CL633), one prehistoric isolated find (33CL632), and one prehistoric site (33CL364). Identification of site 33CL631 resulted in recovery of eight artifacts from the surface; several shovel test pits (STPs) were excavated, but no subsurface artifacts were recovered. Site 33CL632 was a surface isolated find of a non-diagnostic prehistoric biface fragment. Site 33CL634 consisted of two artifacts recovered from the surface, including a Motley projectile point that dates to the Late Archaic or Early Woodland and a non-diagnostic prehistoric biface fragment. Considering the limited number of artifacts identified at these three sites and the absence of any subsurface finds, we agree with CH2M that sites 33CL631, 33CL632, and 33CL364 are not eligible for listing on the National Register of Historic Places (NRHP).

Identification of site 33CL633 resulted in recovery of 76 artifacts from the surface as well as an additional 41 artifacts from 5 STPs. These artifacts, which include a variety of diagnostic artifacts suggesting the site dates to the late 19th through 20th centuries, may be associated with



a farmstead that was likely demolished sometime between the 1930s and 1970s as indicated on topographic maps. CH2M indicated that the site may extend both to the north and south since the site, as tested, extends to the limits of the direct APE and additional materials were visible on the surface outside the direct APE. Although the report does not describe any investigation of historical documents or maps, outside of the 1930s and 1970s mapping, a brief online search conducted by this office revealed that a structure is shown in the area as early as 1870 on a historical atlas and several structures, including what appears to be a residence and barn, are shown as late as 1959 on an aerial image. Early historical atlases and county histories from the late 19th century indicate that the land and structures belonged to a prominent and highly respected local farmer and businessman who moved to the area shortly after the Civil War. The property may also have been previously associated with the first organization of the Methodist Episcopal Church in Moorefield Township. Considering these factors, we disagree with CH2M's recommendation that the portions of site 33CL633 within the direct APE are not eligible for listing on the NRHP and recommend Phase II archaeological testing of the site, including dedicated research into the history of the property and its owners. Please submit a Phase II research design proposal to this office for review. If landowner permission can be obtained, additional Phase I survey to delineate the boundaries of site 33CL633 and identify features could provide a better understanding of the site.

CH2M also conducted a viewshed analysis of areas within 250 feet of the direct APE. According to the report, CH2M choose this limited study area because the project "takes place within active agricultural fields, with pockets of late-20<sup>th</sup> century residential development along the route." Due to the placement of the proposed transmission line across relatively flat farm fields with long sight lines and limited tree lines, the transmission line has significant potential to impact the viewsheds of properties much farther from the proposed line than 250 feet. Generally, we would recommend a larger viewshed analysis study area to account for indirect effects to architectural resources. However, after review of the information provided and a search of our records, we are only requesting additional information on the property located at 5887 Old Mechanicsburg Road. This property, specifically the barn, was identified during a site visit on April 17, 2017. Based on aerial images, the property appears to include an original barn, two residences, and possibly four outbuildings. In order to learn more about this property, a qualified professional in the field of architectural history should complete additional identification, context analysis, and significance analysis of this property. Additional information should include at least the following, but may need to be expanded if research warrants additional investigation:

- A written description of the property and buildings;
- Clear representative photographs of the properties and outbuildings as well as the viewshed to and from the undertaking;
- An evaluation of the property's eligibility for listing on the NRHP;
  - Can the property be evaluated as an historic farmstead?
- A completed effects assessment.

Please submit the requested additional information to this office for review. We look forward to receipt of the Phase II research design and additional information about the structures at 5887 Old Mechanicsburg Road in order to provide further comment.

**OHIO HISTORY CONNECTION**

Ms. Crista M. Haag  
May 30, 2017  
Page 3

While we are not requesting revisions to the submitted report, the following comments should be noted in relation to all future submissions. As outlined in the *Archaeology Guidelines* provided by this office, photographs of diagnostic artifacts from each archaeological site should be included in the report. While photographs of the artifacts from sites 33CL632 and 33CL634 are included in the report, there are no photographs of any artifacts from sites 33CL631 and 33CL633. In cases where numerous historic diagnostic artifacts are recovered, we recommend providing photographs or illustrations that depict a representative sample of diagnostic artifacts from each site. In addition, as described in this office's *Guidelines for Conducting History/Architecture Surveys in Ohio*, the location of any identified architectural resources should be indicated on project maps. Neither the Watson House nor the Marshall House are marked on maps in the submitted report and no addresses are provided for either resource. Adequate photographs should also be provided for each architectural resource. Per the architecture/history *Guidelines*, "Digital photographs that include at minimum the main façade and a side elevation as well as any significant outbuildings should be taken of each resource." These photographs should be taken at a reasonable distance to ensure adequate detail is recorded.

If you have any questions, please contact Kendra Kennedy, Project Reviews Manager, at [kkennedy@ohiohistory.org](mailto:kkennedy@ohiohistory.org) or (614) 298-2000.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Kendra Kennedy', with a stylized flourish at the end.

Kendra Kennedy, Project Reviews Manager  
State Historic Preservation Office

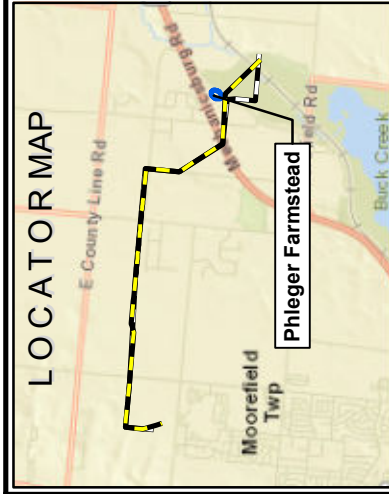
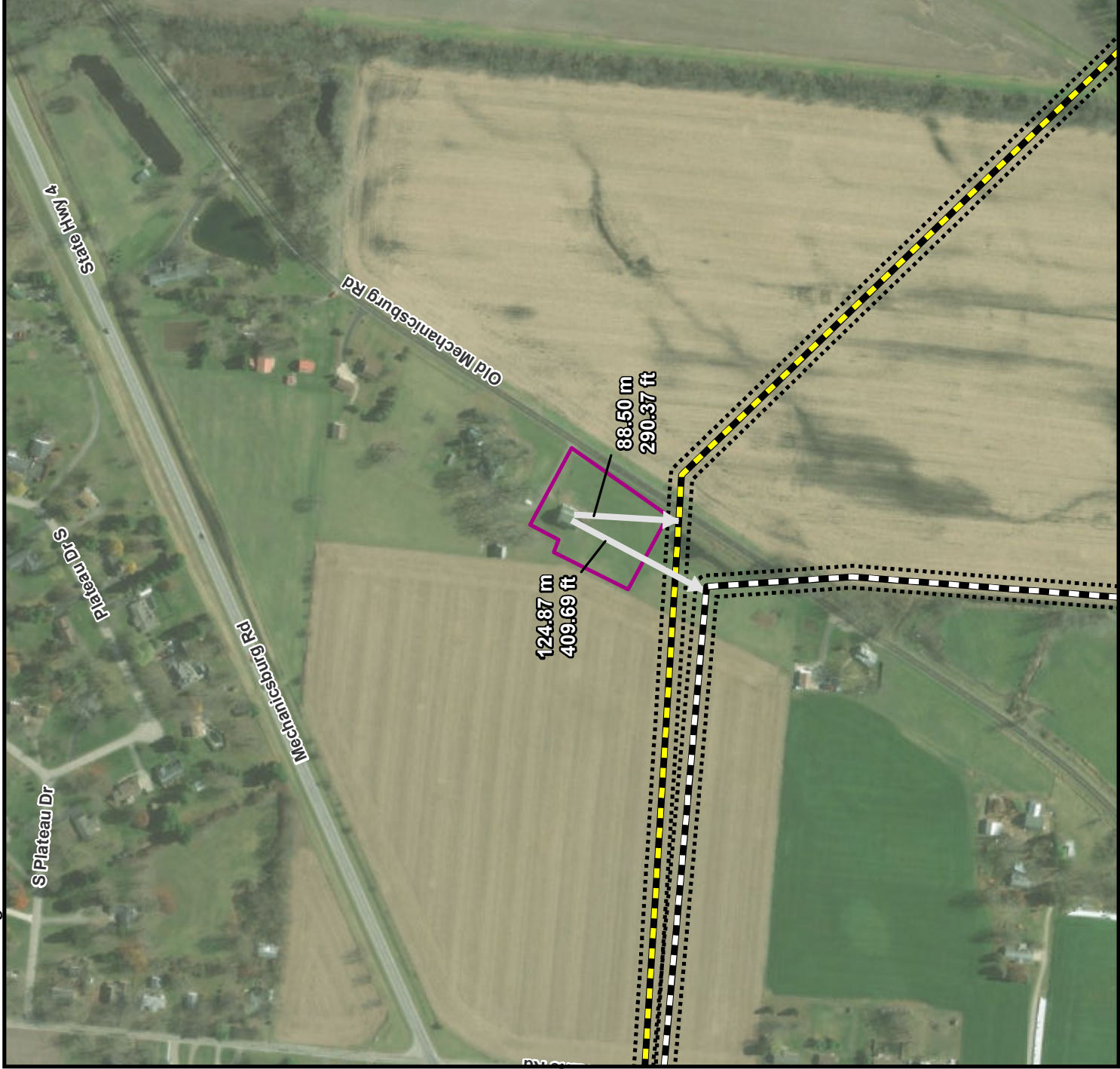
cc: William Beach, FirstEnergy  
cc: James O'Dell, OPSB

Serial No. 1068893





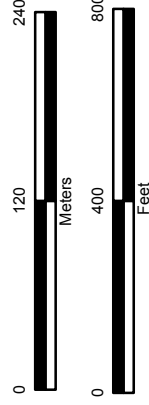




**LEGEND:**

- OPSB Approved Route
- Revised Reroute 3/1/2018
- Distance from Resource to Route
- Proposed Right-of-Way
- Proposed Boundary of Recommended NRHP-Eligible Phleger Farmstead Bank Barn

BASE MAP SOURCE:  
ESRI WORLD IMAGERY LAYER, 2015



East Springfield-Tangy 138 kV Loop to  
Broadview Substation Project  
Clark County, OH

**FIGURE 2**  
**APPENDIX E**  
**PHLEGER FARMSTEAD**

PN: 671092 DATE: 3/1/2018

CREATED BY: DH

REVIEWED BY: KF



May 10, 2018

Kendra Kennedy  
Project Reviews Manager  
Resource Protection and Review  
Ohio Historic Preservation Office  
800 E. 17th Avenue  
Columbus, OH 43211-2474

**Subject: American Transmission Systems, Incorporated – A FirstEnergy Company  
Phleger Barn – Project Changes and Effects Recommendation  
East Springfield-Tangy 138 kV Loop to Broadview Substation Project  
Moorefield Township, Clark County, Ohio  
OHPO No. 2016-CLA-37051**

Dear Ms. Kennedy,

On behalf of our client, American Transmission Systems, Incorporated – a FirstEnergy Company (ATSI), CH2M HILL Engineers, Inc. (CH2M), now part of Jacobs Engineering Group, is submitting this letter summarizing engineering design changes and effect recommendations for the previously determined NRHP-eligible Phleger Barn, located within the Area of Potential Effect (APE) for the East Springfield-Tangy 138 kV Loop to Broadview Substation Project (Project), in Moorefield Township, Clark County, Ohio.

## **Survey and Evaluation – Summary**

In a May 30, 2017 letter, the OHPO requested survey of the Phleger Farmstead at 5887 Old Mechanicsburg Road. Subsequently, CH2M conducted a field visit to this resource on June 30, 2017 and surveyed and evaluated two residential buildings, two barns, a chicken coop, and a springhouse on the property. In an October 3, 2017 letter report, CH2M summarized the survey findings and recommended that the farmstead as a whole did not maintain the historical or architectural significance necessary for NRHP listing under Criteria A, B, or C, but that a circa-1900 bank barn on the property did maintain sufficient significance and integrity for individual NRHP eligibility under Criteria A and C (see Photographs 1 through 3 in Attachment 1).

CH2M further recommended an NRHP boundary encompassing the barn and its immediate surroundings, beginning at a point running parallel to the south side of the existing driveway, to a point intersecting the plane of the fenced barnyard, following the fenceline in a generally southwesterly direction to a point of intersection with the plane of the fenceline's demarcation of a farm pond, running southeasterly to the fenceline marking the eastern edge of the barnyard, running in a northeasterly direction to its point of origin. The proposed boundary, which is inclusive of 1.84 acres (0.74 hectare), is depicted in Attachment 2, Figure 1. The OHPO concurred with this eligibility recommendation and proposed NRHP boundary in a response letter dated October 27, 2017. Additionally, the OHPO noted that as designed, the Project would result in an adverse effect to the resource, due to the alignment crossing an open agricultural field in its immediate viewshed.



Ms. Kendra Kennedy  
OHPO No. 2016-CLA-37051  
May 10, 2018

## Mitigation and Effects Assessment

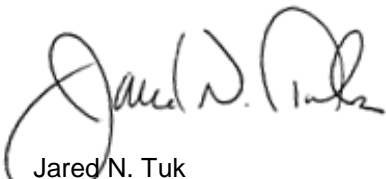
Subsequent to receipt of the OHPO's October 27, 2017 comments, ATSI revisited engineering design of the Project, in part to pre-emptively mitigate adverse effects to the NRHP-eligible Phleger Barn. As shown in Attachment 2, Figure 1, ATSI re-engineered the Project alignment to move proposed pole structures and conductors further from the resource, to allow for both additional topographical screening by the rise to the south and west of the barn, and to eliminate the crossing of an open agricultural field within the viewshed to the southeast. Importantly, the alignment will now extend parallel to and away from the gable end of the barn (a distance of 409 feet at its closest point), which is marked by a non-contemporaneous silo. Furthermore, ATSI proposes to use pole structures at the point of inflection (PI) south of the barn that blend with extant stands of trees. A sample photograph depicting an example of the proposed PI pole structures is included in Attachment 1, Photograph 4.

Considering the re-engineered alignment and use of pole structures that blend with the immediate surroundings, CH2M recommends that the redesigned Project will have No Adverse Effect to the NRHP-eligible Phleger Barn, and no further architectural and historical work is recommended for the Project. A conference call with OHPO Architectural Historian Mary Rody on April 3, 2018 confirmed that the OHPO considers the pre-emptive mitigation measures taken by ATSI to be sufficient in eliminating potential adverse effects to above-ground historic properties from the Project. CH2M and ATSI ask for your written concurrence with our recommendations.

If you have any questions or comments, please contact William Beach from ATSI at 330-384-5524 or [wbeach@firstenergycorp.com](mailto:wbeach@firstenergycorp.com), or you may contact me at 412-249-6611 or at [jared.tuk@jacobs.com](mailto:jared.tuk@jacobs.com). We look forward to receiving your concurrence soon.

Sincerely

CH2M HILL Engineers, Inc.



Jared N. Tuk  
Architectural Historian

Cc: William Beach, ATSI  
Nataliya Bryksenkova, ATSI  
Mary Rody, OHPO

## **Attachment 1 – Photographs**





*Photograph 1 – View of Bank Barn at Phleger Farmstead, Facing Southeast.*



*Photograph 2 – View of Bank Barn at Phleger Farmstead, Facing Southwest.*



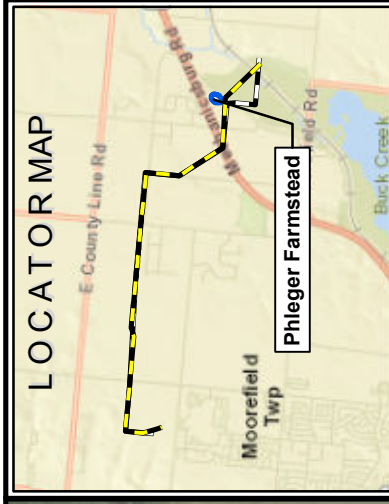
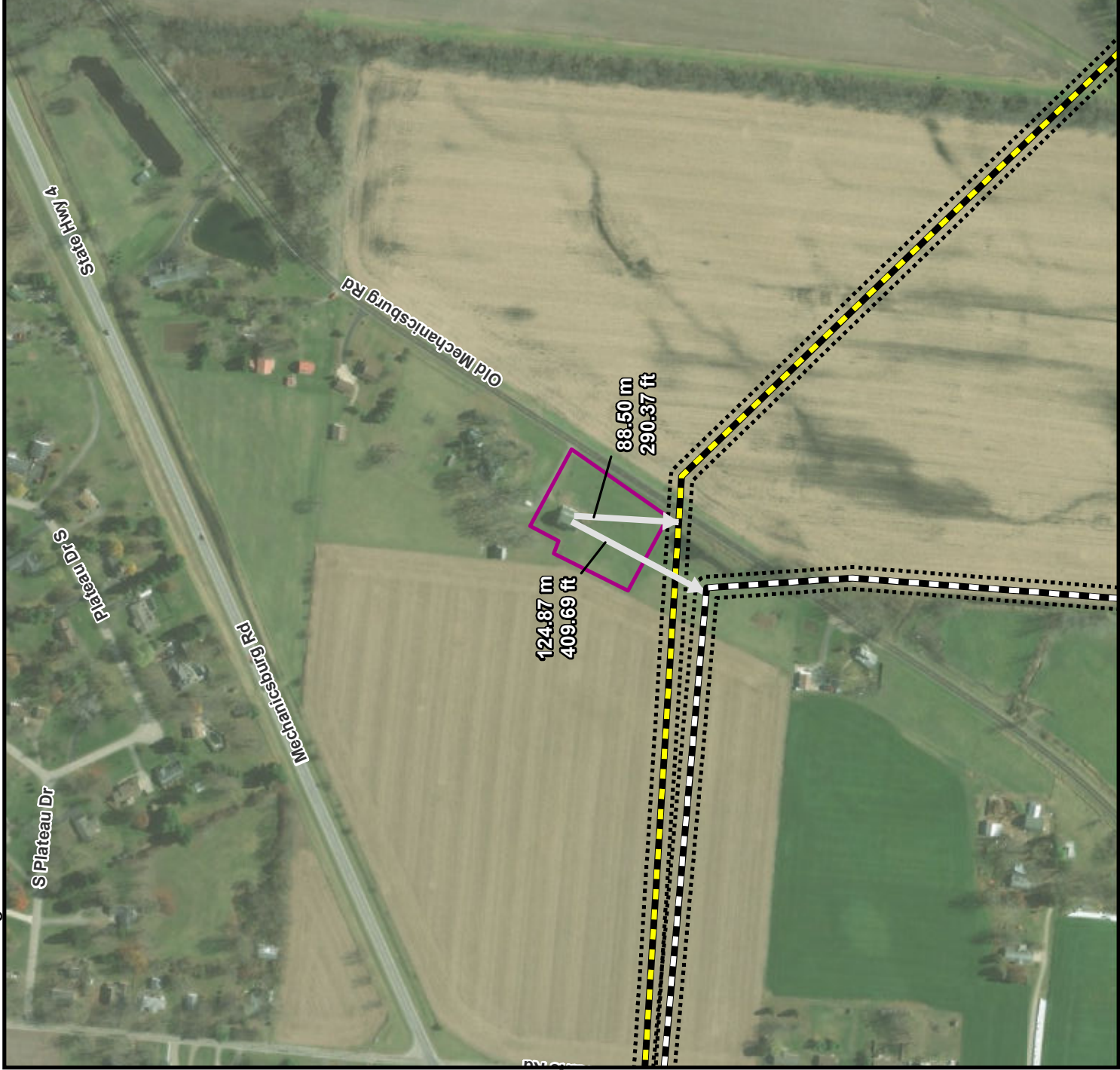
*Photograph 3 – View of Bank Barn at Phleger Farmstead, Facing West in General Direction of Project (To Show Elevation Change and Vegetative Screening).*



*Photograph 4 – Example of Proposed PI Pole Structures Designed to Blend with Surrounding Vegetation.*



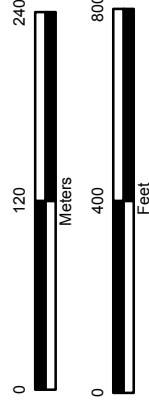
## **Attachment 2 – Figures**



**LEGEND:**

- OPSB Approved Route
- Revised Reroute 3/1/2018
- Distance from Resource to Route
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BASE MAP SOURCE:  
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East Springfield-Tangy 138 kV Loop to  
Broadview Substation Project  
Clark County, OH

**FIGURE 1**  
**PHLEGER FARMSTEAD**  
**AND PROJECT OVERVIEW**

PN: 671092      DATE: 4/4/2018

CREATED BY: DH

REVIEWED BY: KF





**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/18/2018 12:37:54 PM**

**in**

**Case No(s). 18-0594-EL-BTA**

Summary: Application for Amendment to the East Springfield - Tangy 138kv Loop to Broadview Substation (Part 4 of 4) electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc.