

**EXHIBIT T: Ohio Historic
Preservation Office Correspondence**

Smart Campus^E Facility Project

Correspondence with Ohio Historical Preservation Office

ENGIE Buckeye Operations

TRC

Columbus, OH

Exhibit Contents:

- **Original Section 106 Review Form (June 18, 2019)**
- **OHPO Letter Response (July 1, 2019)**
- **OHPO – Project Team Clarification Correspondence (July 12, 2019)**
- **Updated Section 106 Review Form with Laydown Area (October 17, 2019)**
- **Updated Section 106 Submission Correspondence (October 17, 2019)**
- **OHPO Letter Response (October 31, 2019)**



In reply refer to
2019-FRA-45588

July 1, 2019

Mike Sponsler
TRM Environmental, Inc.
690 Taylor Road
Gahanna, Ohio 43230

Dear Mr. Sponsler,

RE: OSU SmartCampus Combined Heat and Power Project, Columbus, Franklin County, Ohio

This is in response to correspondence, received on June 18, 2019, regarding the proposed gas fired combustion turbines and associated facilities in Columbus, Franklin County, Ohio. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information provided, I agree with the recommendation that no further archaeological work is necessary in the proposed project area. It is my opinion that the proposed project will not affect historic properties. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2000, or by email at nyoung@ohiohistory.org

Sincerely,

A handwritten signature in dark ink, reading "Nathan J. Young".

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

From: [Nathan Young](#)
To: [Sponsler, Mike](#)
Subject: RE: July 1 Letter 2019-FRA-45588
Date: Friday, July 12, 2019 8:40:59 AM
Attachments: [image001.png](#)

When I reference historic properties, I am using it in the 36 CFR 800.16 (k) (1)(1) sense:

1)(1) *Historic property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

So yes, I also mean this to include historic architecture.

From: Sponsler, Mike [mailto:MSponsler@trccompanies.com]
Sent: Friday, July 12, 2019 8:14 AM
To: Nathan Young
Subject: July 1 Letter 2019-FRA-45588

Good Morning Nathan,
Thanks for you rapid reply to my request!
I have a question. It appears the letter only addresses archaeological resources, unless the sentences stating "the proposed properties will not affect historic properties" covers historic architecture. Can you clarify? Thanks

Best,
Mike Sponsler
Senior Project Manager



690 Taylor Road, Suite 100, Gahanna, OH 43230
C 614.623.0485
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OHIO HISTORIC PRESERVATION OFFICE: RESOURCE PROTECTION AND REVIEW

Section 106 Review - Project Summary Form

For projects requiring a license from the Federal Communications Commission, please use FCC Forms 620 or 621. **DO NOT USE THIS FORM.**

SECTION 1: GENERAL PROJECT INFORMATION

All contact information provided must include the name, address and phone number of the person listed. Email addresses should also be included, if available. Please refer to the Instructions or contact an OHPO reviewer (<mailto:Section106@ohiohistory.org>) if you need help completing this Form. Unless otherwise requested, we will contact the person submitting this Form with questions or comments about this project.

Date: June 2019

Name/Affiliation of person submitting form: Mike Sponsler / TRC

Mailing Address: TRC Environmental Inc., 690 Taylor Road, Gahanna, Ohio 43230

Phone/Fax/Email: 614-623-0485 / msponsler@trcsolutions.com

A. Project Info:

1. This Form provides information about:

New Project Submittal:
YES

Additional information relating to previously submitted project:
NO

OHPO/RPR Serial Number from previous submission: N/A

2. Project Name (if applicable):

The Ohio State University SmartCampus^E Combined Heat and Power (CHP)
Project

3. Internal tracking or reference number used by Federal Agency, consultant,
and/or applicant to identify this project (if applicable): N/A

B. Project Address or vicinity: 40.002074, -83.29015

C. City/Township: City of Columbus

D. County: Franklin County

E. Federal Agency and Agency Contact. *If you do not know the federal agency involved in your project, please contact the party asking you to apply for Section 106 Review, not OHPO, for this information. HUD Entitlement Communities acting under delegated environmental review authority should list their own contact information.*

N/A

F. Type of Federal Assistance. *List all known federal sources of federal funding, approvals, and permits to avoid repeated reviews.*

N/A

G. State Agency and Contact Person (if applicable):
Ohio Power Siting Board (OPSB)

H. Type of State Assistance:

N/A

I. Is this project being submitted at the direction of a state agency **solely** under Ohio Revised Code 149.53 or at the direction of a State Agency? *Answering yes to this question means that you are sure that no federal funding, permits or approvals will be used for any part of your project, and that you are seeking comments only under ORC 149.53.*

YES

J. Public Involvement- Describe how the public has been/will be informed about this project and its potential to affect historic properties. Please summarize how they will have an opportunity to provide comments about any effects to historic properties. (This step is required for all projects under 36 CFR § 800.2):

Public involvement has yet to be initiated for this project to date.

K. Please list other consulting parties that you have contacted/will contact about this project, such as Indian Tribes, Certified Local Governments, local officials, property owners, or preservation groups. (See 36 CFR § 800.2 for more information about involving other consulting parties). Please summarize how they will have an opportunity to provide comments:

SECTION 2: PROJECT DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

Provide a description of your project, its site, and geographical information. You will also describe your project's Area of Potential Effects (APE). Please refer to the Instructions or contact an OHPO reviewer if you need help with developing the APE or completing this form.

The proposed Project includes the siting of the approximate 0.95-acre CHP Facility with Interconnection System to American Electric Power in Franklin County, Ohio. The proposed Project area is located within an urbanized (developed) area approximately 700 feet (0.13 mile) southeast of the Woody Hayes Drive intersection with John H Herrick Drive and Vernon L. Tharp Street. The proposed Project will include buried water, electrical interconnection, communication and natural gas lines from the site to the interconnection points. The lines will be attached to a pedestrian footbridge that spans the Olentangy River. Buried electrical and communications lines will run along John H. Herrick Road and beneath the Olentangy River inside an existing conduit to their interconnection points. No tree clearing will occur. Minimal tree cutting is anticipated. Construction of the proposed facility is anticipated to commence in March 2020 and be completed by April 2021. Appropriate Best

Management Practices (BMPs) will be utilized during construction of the proposed facility to mitigate construction impacts, including, but not limited to noise, dust, utility disruption, debris and soil disposal, water quality, disruption of traffic or access to properties, safety, and security.

For challenging projects, provide as much information as possible in all sections, and then check the box in Section 5.A. to ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties or if there may be challenging procedural issues related to your project. Please note that providing information to complete all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

A. Does this project involve any Ground-Disturbing activity: YES

(If **Yes**, you must complete all of Section 2.A. If **No**, proceed directly to Section 2. B.)

1. General description of width, length and depth of proposed ground disturbing activity:

Approximately 1.35-acre within a previously disturbed area.

2. Narrative description of previous land use and past ground disturbances, if known:

The entire APE is located within areas of previous impacts associated with urban development.

3. Narrative description of current land use and conditions:

Urban development associated with The Ohio State University facilities. A greenhouse facility is the current land use. Several hoop greenhouses, small compost piles and planting boxes exist on site. The entire facility area is covered with gravel to provide a suitable base for greenhouse operation. Cabling disturbances will be in area previously disturbed for urban developed of the campus.

4. Does the landowner know of any archaeological resources found on the property?

NO If yes, please describe:

B. Submit the exact project site location on a USGS 7.5-minute topographic quadrangle map for all projects. Map sections, photocopies of map sections, and online versions of USGS maps are acceptable as long as the location is clearly marked. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:

1. USGS Quad Map Name: Northwest Columbus

2. Township/City/Village Name: City of Columbus

C. Provide a street-level map indicating the location of the project site; road names must be identified and legible. Your map must show the exact location of the boundaries for the project site. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:

See Maps included in the attached report (Cultural Resources Due Diligence Records Review, SmartCampus^E Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019).

D. Provide a verbal description of the APE, including a discussion of how the APE will include areas with the potential for direct and indirect effects from the project. Explain the steps taken to identify the project's APE, and your justification for the specific boundaries chosen:

The APE for indirect effects is based primarily of those resources and areas that could potentially fall within line of sight of the proposed facility (See attached Preliminary Viewshed Analysis Map). The APE for direct effects consists of the approximately 1.35 acres which comprises all areas which the construction or ground disturbance will take place.

- E. Provide a detailed description of the project. This is a critical part of your submission. Your description should be prepared for a cold reader who may not be an expert in this type of project. The information provided must help support your analysis of effects to historic properties, not other types of project impacts. Do not simply include copies of environmental documents or other types of specialized project reports. If there are multiple project alternatives, you should include information about all alternatives that are still under active consideration:

A Combined Heat and Power (CHP) major utility facility is proposed to be installed on the campus of The Ohio State University (OSU). Two Siemens SGT 700 gas-fired combustion turbine generators are proposed for installation. The CHP site is 0.95 acres on an area previously disturbed for the Howlett Greenhouse operations on The Ohio State University, Columbus Campus. The site is on the corner of John H. Herrick Drive and Vernon L. Tharp Street adjacent to the Galbreath Equine Center, Parker Food and Science Technology Building, Howlett Greenhouses, and Howlett Hall. The site is a gravel pad within a chain link fence that contains greenhouses and related structures (e.g. composting bins). The two gas-fired turbines will be enclosed in a building that is 60 feet tall. The facility will have two banks of cooling towers which will be located on the roof of the facility. Both cooling tower banks will extend 30 feet above the roof. Two stacks will be a total of 115 feet in height. "Associated facilities" as defined by the OPSB rules will consist of buried lines except where the natural gas line will be attached to the footbridge crossing the Olentangy River. The buried lines will be located in previously disturbed areas through streets, roads, sidewalks and parking lots within the urbanized area developed for the campus. The line lengths are as follows:

- 2,300 feet for steam,
- 4,200 for treated condensate,
- 2,750 feet of 13.8 kV electrical cabling,
- 2,750 feet of communications cabling,
- 3,639 feet for a treated water line,
- 3,500 of natural gas supply, and
- less than 100 feet each of sanitary sewer, storm sewer and domestic cold water.

SECTION 3: IDENTIFICATION OF HISTORIC PROPERTIES

Describe whether there are historic properties located within your project APE. To make that determination, use information generated from your own Background Research and Field Survey. Then choose one of the following options to report your findings. Please refer to the Instructions and/or contact an OHPO reviewer if you are unsure about how to identify historic properties for your project.

See the attached Cultural Resources Due Diligence Records Review, SmartCampus^E Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019.

If you read the Instructions and you're still confused as to which reporting option best fits your project, or you are not sure if your project needs a survey, you may choose to skip this section, but provide as much supporting documentation as possible in all other Sections, then check the box in Section 5.A. to request preliminary comments from OHPO. After reviewing the information provided, OHPO will then offer comments as to which reporting option is best suited to document historic properties for your project. Please note that providing information

to complete this Section will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

Recording the Results of Background Research and Field Survey:

- A. **Summary of discussions and/or consultation with OHPO** about this project that demonstrates how the Agency Official and OHPO have agreed that no Field Survey was necessary for this project (typically due to extreme ground disturbance or other special circumstances). Please **attach copies** of emails/correspondence that document this agreement. You must explain how the project's potential to affect both archaeological and historic resources were considered.

This Project is in the early stages of development and no cultural resources field studies have been undertaken at this time. See the attached Cultural Resources Due Diligence Records Review, SmartCampus^E Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019, Figures and Photosimulations).

- B. **A table that includes the minimum information** listed in the OHPO Section 106 Documentation Table (which is generally equivalent to the information found on an inventory form). This information must be printed and mailed with the Project Summary Form. To provide sufficient information to complete this Section, you must also include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated in the project APE.
- C. **OHI (Ohio Historic Inventory) or OAI (Ohio Archaeological Inventory) forms-** New or updated inventory forms may be prepared using the OHI pdf form with data population capabilities, the Internet IForm, or typed on archival quality inventory forms. To provide sufficient information to complete this Section, you must include summary observations from your field survey and background research. You must also include eligibility determinations for each property that was evaluated in the project APE
- D. **A historic or archaeological survey report** prepared by a qualified consultant that meets professional standards. The survey report should meet the Secretary of the Interior's Standards and Guidelines for Identification and OHPO Archaeological Guidelines. You may also include new inventory forms with your survey, or update previous inventory forms. To complete this section, your survey report must include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated within the APE.
- E. **Project Findings.** Based on the conclusions you reached in completing Section 3, please choose one finding for your project. There are (mark one):

Background research in the OHPO Online Mapping System revealed a previously surveyed area associated with the Historic District Evaluation for the City of Columbus (HB00124) located within the eastern portion of the APE boundaries. Based on the urban development within the City of Columbus, thousands of archaeological and architectural resources have been documented within the 16-km (10-mi), 8-km (5-mi), and 0.6-km (1-mi) radii of the project location. However, only six (6) NRHP-listed architectural resources located within the 1-mile radius of the project area. In addition to these resources, three (3) cemetery resources were identified within the 1-mile 0.6-km (1-mi) radius of the project location.

SECTION 4: SUPPORTING DOCUMENTATION

This information must be provided for all projects.

No studies have been undertaken at this time as the project is in preliminary stages of

development.

- A. Photographs must be keyed to a street-level map, and should be included as attachments to this application. Please label all forms, tables and CDs with the date of your submission and project name, as identified in Section 1. You must present enough documentation to clearly show existing conditions at your project site and convey details about the buildings, structures or sites that are described in your submission. Faxed or photocopied photographs are not acceptable. See Instructions for more info about photo submissions or 36 CFR § 800.11 for federal documentation standards.
 - 1. Provide photos of the entire project site and take photos to/from historic properties from/towards your project site to support your determination of effect in Section 5.
 - 2. Provide current photos of all buildings/structures/sites described.
- B. Project plan, specifications, site drawings and any other media presentation that conveys detailed information about your project and its potential to affect historic properties.
- C. Copies or summaries of any comments provided by consulting parties or the public.

SECTION 5: DETERMINATION OF EFFECT

- A. **Request Preliminary Comments.** For challenging projects, provide as much information as possible in previous sections and ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties, if the public has concerns about your project's potential to affect historic properties, or if there may be challenging procedural issues related to your project. Please be aware that providing information in all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.
 - 1. We request preliminary comments from OHPO about this project:
YES
 - 2. Please specify as clearly as possible the particular issues that you would like OHPO to examine for your project (for example- help with developing an APE, addressing the concerns of consulting parties, survey methodology, etc.):

Upon OHPO's review of this response to OHPO's questionnaire, we would like to engage in further communications with OHPO and look forward to discussing any comments that OHPO might have regarding methodology for the proposed undertaking.

- B. **Determination of Effect.** If you believe that you have gathered enough information to conclude the Section 106 process, you may be ready to make a determination of effect and ask OHPO for concurrence, while considering public comments. Please select and mark one of the following determinations, then explain the basis for your decision on an attached sheet of paper:

Sufficient data has not yet been compiled to make recommendations regarding a Section 106 Assessment of Effect for this proposed undertaking. We are requesting comments and guidance regarding proposed methodology.

No historic properties will be affected based on 36 CFR § 800.4(d) (1).
Please explain how you made this determination:

Not yet determined.

No Adverse Effect [36 CFR § 800.5(b)] on historic properties. This finding cannot be used if there are no historic properties present in your project APE. Please explain why the Criteria of Adverse Effect, [36 CFR Part 800.5(a) (1)], were found not to be applicable for your project:

Not yet determined.

Adverse Effect [36 CFR § 800.5(d) (2)] on historic properties. Please explain why the criteria of adverse effect, [36 CFR Part 800.5(a) (1)], were found to be applicable to your project. You may also include an explanation of how these adverse effects might be avoided, reduced or mitigated:

Not yet determined.

Please print and mail completed form and supporting documentation to:
Ohio Historic Preservation Office
Attn: Resource Protection and Review Department Head
Resource Protection and Review
800 E. 17th Avenue
Columbus, OH 43211-2497

**Cultural Resources Due Diligence Records Review
Smart^E Campus Combined Heat and Power (CHP) Project
City of Columbus, Franklin County, Ohio
June 2019**

Project Description

On behalf of The Ohio State University, Ohio State Energy Partners, and ENGIE Services, Inc., TRC Environmental Corporation (TRC) has prepared this Cultural Resources Due Diligence Records File Review as part of the environmental studies conducted for the SmartCampus^E Combined Heat and Power (CHP) Project (Project) located in the City of Columbus, Franklin County, Ohio (40.002074, -83.29015) (Figure 1). The proposed Project area is located within an urbanized (developed) area at the intersection of Vernon Sharp Street and John H. Herrick Drive. The proposed Project will include buried chilled water, heating hot water, and steam and treated water lines from the site to the interconnection points. The lines will be attached to a pedestrian footbridge that spans the Olentangy River. Buried electrical and communications lines will run along John H. Herrick Road and beneath the Olentangy River inside an existing conduit to their interconnection points. The Project Area of Potential Effects (APE) consists of approximately 0.95 acres of urban land and comprises all areas of proposed ground disturbance. The project area in its entirety has been previously impacted by urban development.

Ohio Database Review

TRC conducted a records review of the resources available from the State Historic Preservation Office (SHPO), i.e. Ohio Historic Preservation Office (OHPO) including the Ohio Historic Inventory (OHI), the Ohio Archaeological Inventory (OAI), and the National Register of Historic Places (NRHP) files, as well as information on historic cemeteries maintained by the Ohio Genealogical Society (OGS). As part of this records review, TRC examined all available cultural resources survey reports relating to previous investigations in the area. This review identified previously surveyed, National Register-eligible, or National Register-listed resource structures or districts within the defined viewshed area and constituted the initial cultural background research and architectural (visual effects) APE for the project.

The APE for architectural resources is based primarily on those resources and areas that could potentially fall within line of sight of the proposed CHP Facility with Interconnection System. It consisted of a three (3) tier radius around the proposed facility at 0.6-km (1-mi), 8-km (5-mi), 16-km (10-mi). The APE for ground disturbance consists of the approximately 0.95 acres which comprises all areas that will fall within the proposed area where construction will take place.

This records review was conducted in accordance with the Secretary of the Interior's Standards for Archaeology and Historic Preservation (Federal Register Vol. 48, No. 190, Part IV, (1983) and the OHPO's Archaeological Guidelines (1994).

The final task of the background research was to conduct a brief review of soils and topographic conditions. Archaeological sites in the area are known to be associated with certain environmental parameters, which can then be used to help assess the relative potential of the project for containing archaeological sites.

The United States Department of Agriculture (USDA) predominately maps the soil of the APE as Urban land complexes, with the majority being Celina (CfB) and Udorthents (Ut) – urban land complex. These soils are comprised of modified soils, radically altered by cutting and filling activities, which would be considered to have no archaeological potential.

Historic Architectural Resources

Background research in the OHPO Online Mapping System revealed a previously surveyed area associated with the Historic District Evaluation for the City of Columbus (HB00124) located within the eastern portion of the APE boundaries. Based on the urban development within the City of Columbus, thousands of archaeological and architectural resources have been documented within the 16-km (10-mi), 8-km (5-mi), and 0.6-km (1-mi) radii of the project location. However, only six (6) NRHP-listed architectural resources located within the 1-mile radius of the project area (Figure 2). In addition to these resources, three (3) cemetery resources were identified within the 1-mile 0.6-km (1-mi) radius of the project location.

NR LISTED RESOURCES WITHIN 1-MILE RADIUS		
OBJECT ID#	RESOURCE NAME/TYPE	DATE
2396	Old Ohio Union	1909
1406	Hays & Orton Halls	1893
1243	North Columbus Commercial Historic District	1880-1960
3259	Orton Memorial Laboratory	1929
1613	Ohio Stadium	1921
3511	Iuka Ravine Historic District	1905-1925

Archaeological Resources

The file review revealed no previously recorded archaeological resources identified within the footprint of the proposed CHP Facility. Based on the urban development within the City of Columbus, thousands of archaeological resources have been documented within the 16-km (10-mi) radius of the project location. A total of 197 of these resources were previously documented within the 8-km (5-mi) radius of the project. The majority of which are characterized as open habitation sites dating to an unknown prehistoric cultural temporal period. Of these resources, only 29 were identified within a 0.6-km (1-mi) radius of the project footprint, which are listed in the table below (Figure 3). Similar to the sites documented throughout the region, the majority of the resources, 19 in total, are characterized as open habitation sites primarily dating to an unknown prehistoric cultural temporal period. Of the remaining sites within 0.6-km (1-mi) radius of APE, seven (7) dated from the Archaic prehistoric period, one (1) from the Woodland period, and two (2) were characterized as prehistoric and historic multi-component sites.

ARCHAEOLOGICAL RESOURCES WITHIN 1-MILE RADIUS		
SITE #	SITE NAME	SITE AFFILIATION
33FR0094	Unnamed	Unknown Prehistoric
33FR0169	Unnamed	Late Archaic Prehistoric
33FR0170	Unnamed	Unknown Prehistoric
33FR0171	Unnamed	Early Archaic Prehistoric
33FR0172	Unnamed	Unknown Prehistoric
33FR0173	Unnamed	Early Archaic Prehistoric
33FR0174	Unnamed	Early-Late Archaic Prehistoric
33FR0175	Unnamed	Unknown Prehistoric

ARCHAEOLOGICAL RESOURCES WITHIN 1-MILE RADIUS		
SITE #	SITE NAME	SITE AFFILIATION
33FR0176	Unnamed	Unknown Prehistoric
33FR0177	Unnamed	Early-Middle Woodland Prehistoric
33FR0178	Unnamed	Unknown Prehistoric
33FR0200	Unnamed	Unknown Prehistoric
33FR0201	Unnamed	Unknown Prehistoric
33FR0202	Unnamed	Unknown Prehistoric
33FR0206	Unnamed	Unknown Prehistoric
33FR0208	Unnamed	Unknown Prehistoric
33FR0209	Unnamed	Early-Late Archaic Prehistoric
33FR0210	Unnamed	Unknown Prehistoric
33FR0230	Unnamed	Late Archaic Prehistoric
33FR0348	Unnamed	Unknown Prehistoric
33FR0402	Unnamed	Unknown Prehistoric
33FR0476	Unnamed	Late Archaic Prehistoric
33FR0563	Unnamed	Unknown Prehistoric
33FR0619	Unnamed	Prehistoric and Historic
33FR0623	Unnamed	Unknown Prehistoric
33FR0624	Unnamed	Unknown Prehistoric
33FR0706	Unnamed	Prehistoric and Historic
33FR1333	Unnamed	Unknown Prehistoric
33FR2891	Unnamed	Unknown Prehistoric

Previous Cultural Resource Surveys

During the file review of previously conducted survey records maintained by the SHPO, it was revealed 333 Phase I Cultural Resources Surveys, 34 Phase II Surveys, and 15 Phase III Data Recovery/Mitigation projects were completed within the 16-km (10-mi) radius of the project area and 68 Phase I Cultural Resources Surveys, 12 Phase II Surveys, and six (6) Phase III Data Recovery/Mitigation projects were completed within the 8-km (5-mi) radius that have been previously cleared for cultural resources. Of these surveys, a single Phase I survey and an associated addendum were conducted within the APE footprint, which are listed in the table below and depicted on Figure 4.

CULTURAL RESOURCES SURVEY WITHIN THE APE		
NADB #	SURVEY NAME	SURVEY TYPE
18348	American Electric Power's Roberts - OSU Transmission Line Project in Columbus Township, Franklin County, Ohio	Phase I Cultural Resource Survey

CULTURAL RESOURCES SURVEY WITHIN THE APE		
NADB #	SURVEY NAME	SURVEY TYPE
18441	Addendum for the American Electric Power's Roberts - OSU Transmission Line Project, Franklin County, Ohio	Phase I Cultural Resource Survey Addendum

Conclusions

The OHPO Online Mapping System revealed a previously surveyed area associated with the Historic District Evaluation for the City of Columbus (HB00124) located within the eastern portion of the APE boundaries. The landscape is filled with tall structures such as multi-story buildings, cell towers, stacks on buildings, highway light poles on an elevated roadbed, stacks from the existing McCracken Power Plant, etc., so the facility will blend in with the surrounding features. Viewshed maps (Figures 1-5) shows relatively limited visibility of the site from surrounding areas and is likely restricted to the top of the stacks. Photosimulations also demonstrate the limited visibility. Visibility is low due to relatively low height of the proposed structures for the project, the height of surrounding multi-story buildings and the adjacent elevated highway. Based on these factors an architectural APE of 0.3 km (1,000 ft.) is recommended.

Based on the urban development within the City of Columbus, thousands of archaeological resources have been documented within the 16-km (10-mi), 8-km (5-mi), and 0.6-km (1-mi) radii of the project location. However, there are six (6) NRHP-listed architectural resources located within the 1-mile radius of the project area. The file review revealed no previously recorded archaeological resources identified within the footprint of the proposed CHP Facility. Based on the urban development within the City of Columbus, thousands of archaeological resources have been documented within the 16-km (10-mi) radius of the project location. A total of 197 of these resources were previously documented within the 8-km (5-mi) radius of the project. The majority of which are characterized as open habitation sites dating to an unknown prehistoric cultural temporal period. Of these resources, only 29 were identified within a 0.6-km (1-mi) radius of the project footprint. Based on previous impacts, the APE is considered to have low to no potential for archaeological resources and is recommended for no further study.

This review was conducted by professionals who meet the 36 CFR 61 Secretary of the Interior's Professional Qualification Standards.

Sincerely,



Curtis L. Biondich, M.S., RPA
PPL Office Practice Leader/Practice Safety Lead
36CFR61-Qualified Archaeologist

References

Goodwin, Ben, and Crista Haag

2010 *Phase I Cultural Resources Survey of the American Electric Power's Roberts-OSU Transmission Line Project in Columbus Township, Franklin County, Ohio.*

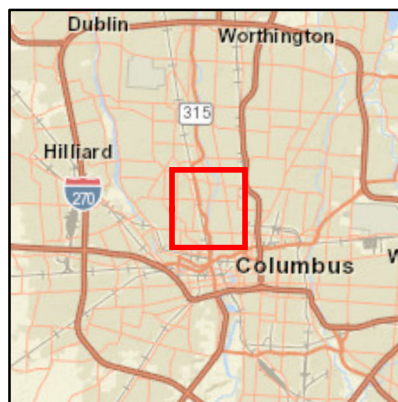
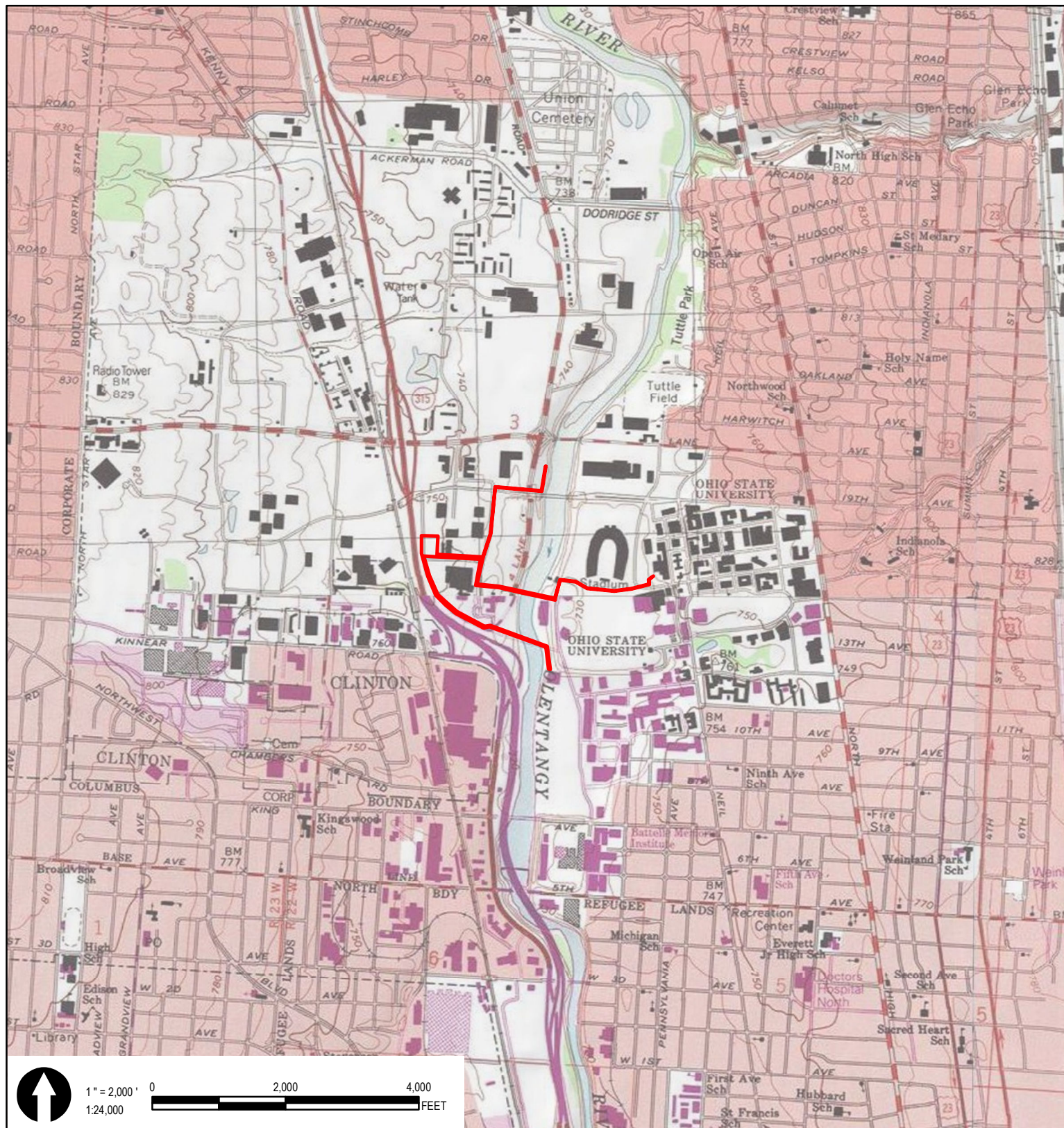
United States Geological Survey (USGS)

1965 Southwest Columbus, Ohio 7.5-minute Quadrangle.

1983 Northwest Columbus, Ohio 7.5-minute Quadrangle.

URS Corp.

2010 *Addendum for the Phase I Cultural Resources Survey of the American Electric Power's Roberts-OSU Transmission Line Project (Ohio State University), Franklin County, Ohio.*



Legend

Area of Potential Effects

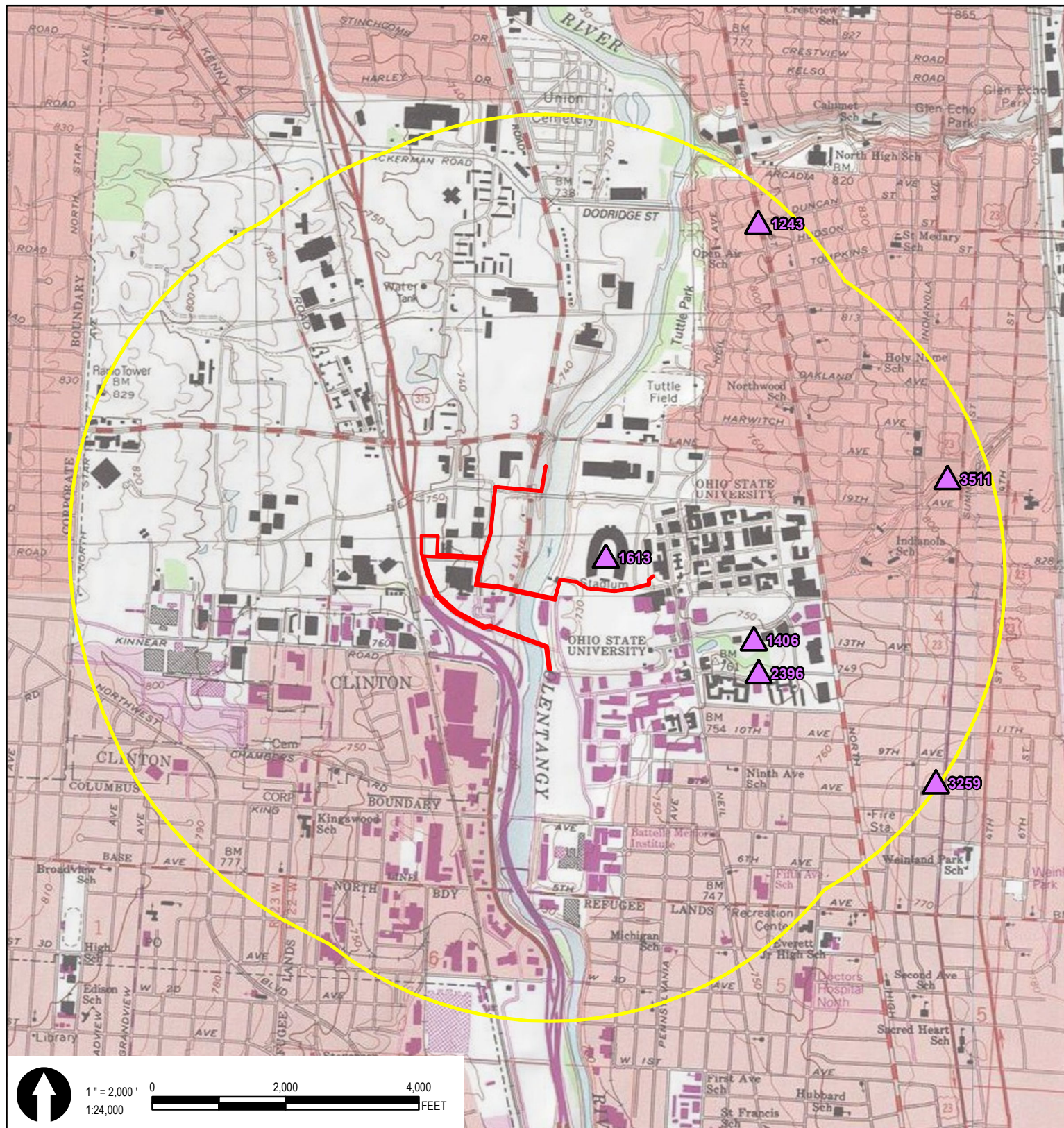
Data Sources: ESRI, USGS, TRC

ENGIE Services, Inc.
The Ohio State University
Smart Campus Combined
Heat and Power (CHP) Project
Columbus, Franklin County, Ohio

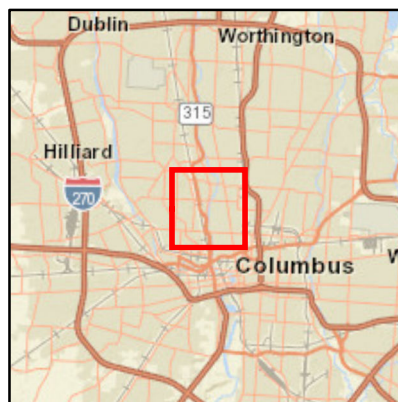
Figure 1
 USGS Project Location Map

Created By: JVanveer on 2/5/2019

TRC 2200 Liberty Avenue, Suite 100
 Results you can rely on Pittsburgh, PA 15220



1" = 2,000' 0 2,000 4,000
1:24,000 FEET



Legend

- Area of Potential Effects
- APE 1-Mile Buffer
- ▲ NR Listed Resource

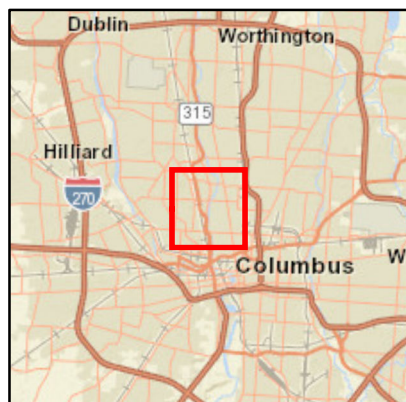
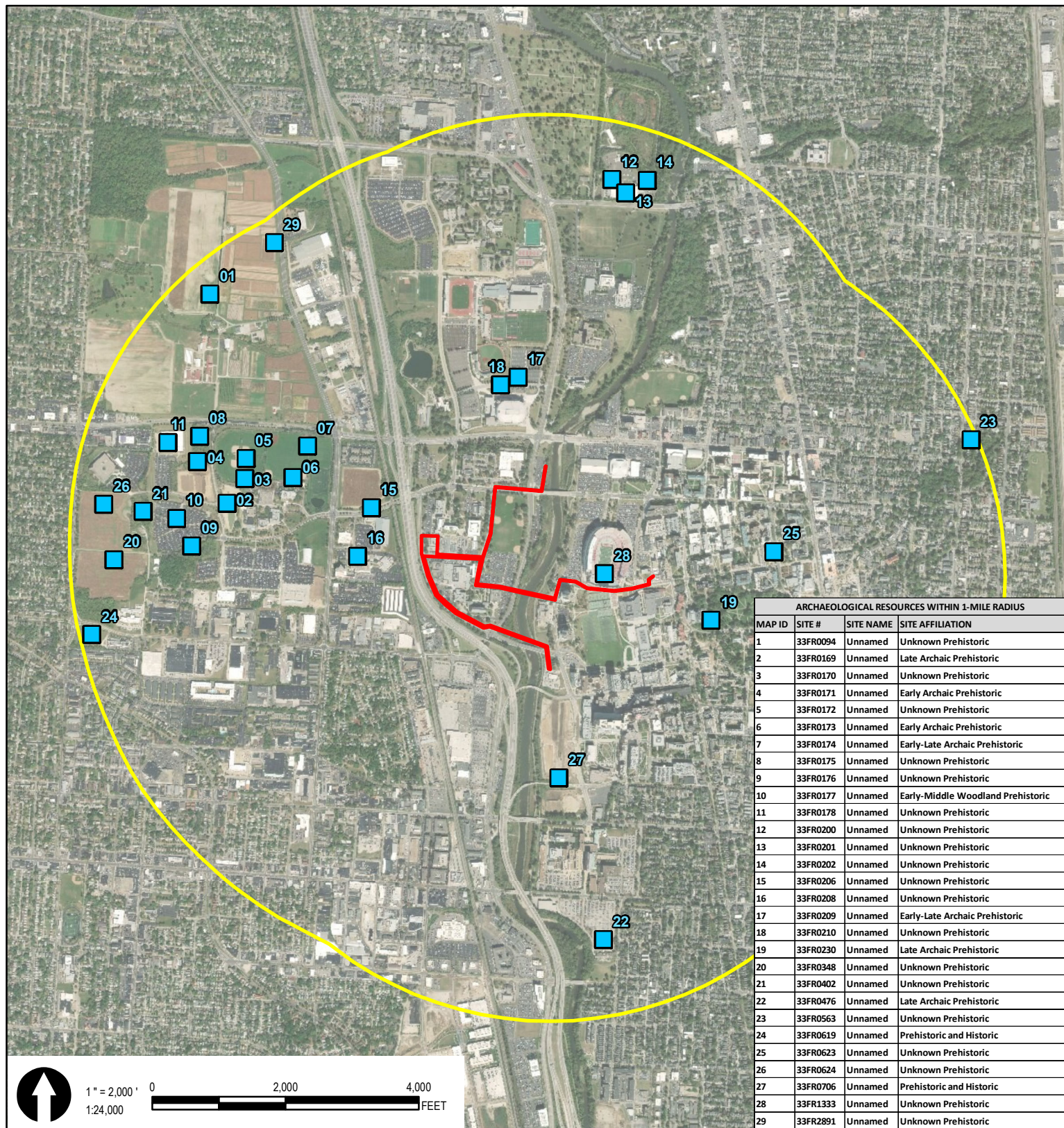
Data Sources: ESRI, OHPO, TRC

ENGIE Services, Inc.
The Ohio State University
Smart Campus Combined
Heat and Power (CHP) Project
Columbus, Franklin County, Ohio

Figure 2
 National Register Listed Resources
 Within 1-Mile of APE

Created By: JVanDeveer on 2/5/2019

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 Results you can rely on Pittsburgh, PA 15220



Legend

- Area of Potential Effects
- APE 1-Mile Buffer
- Archaeological Resources

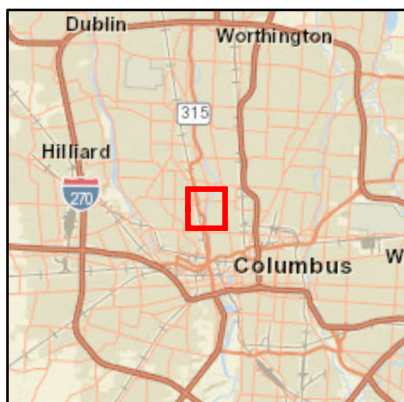
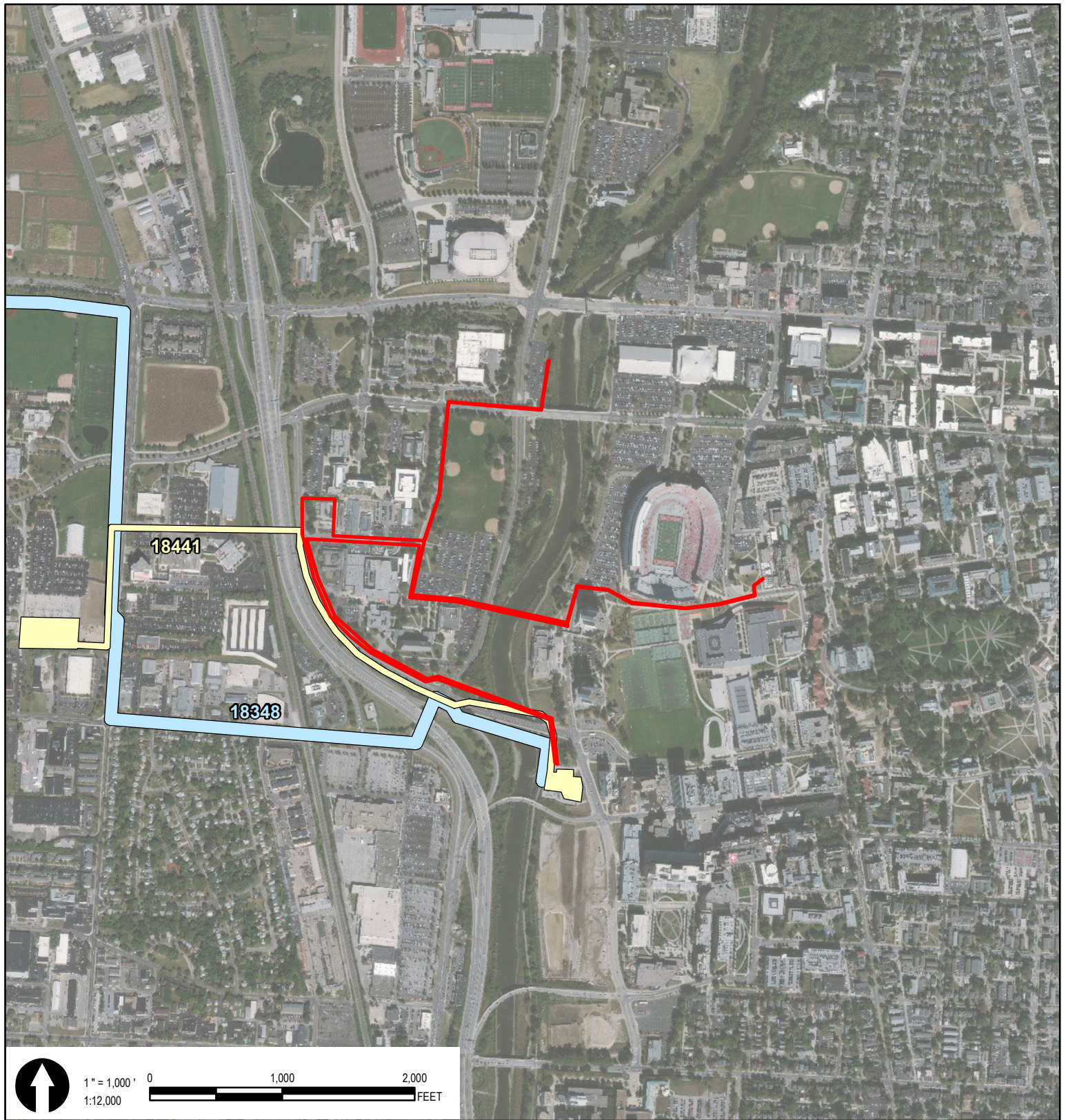
Data Sources: ESRI, OHPO, TRC

ENGIE Services, Inc.
The Ohio State University
Smart Campus Combined
Heat and Power (CHP) Project
Columbus, Franklin County, Ohio

Figure 3
Archaeological Resources
Within 1-Mile of APE

Created By: JVanDeveer on 2/5/2019

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 Pittsburgh, PA 15220
Results you can rely on



Legend

Area of Potential Effects

Previous Surveys

18348

18441

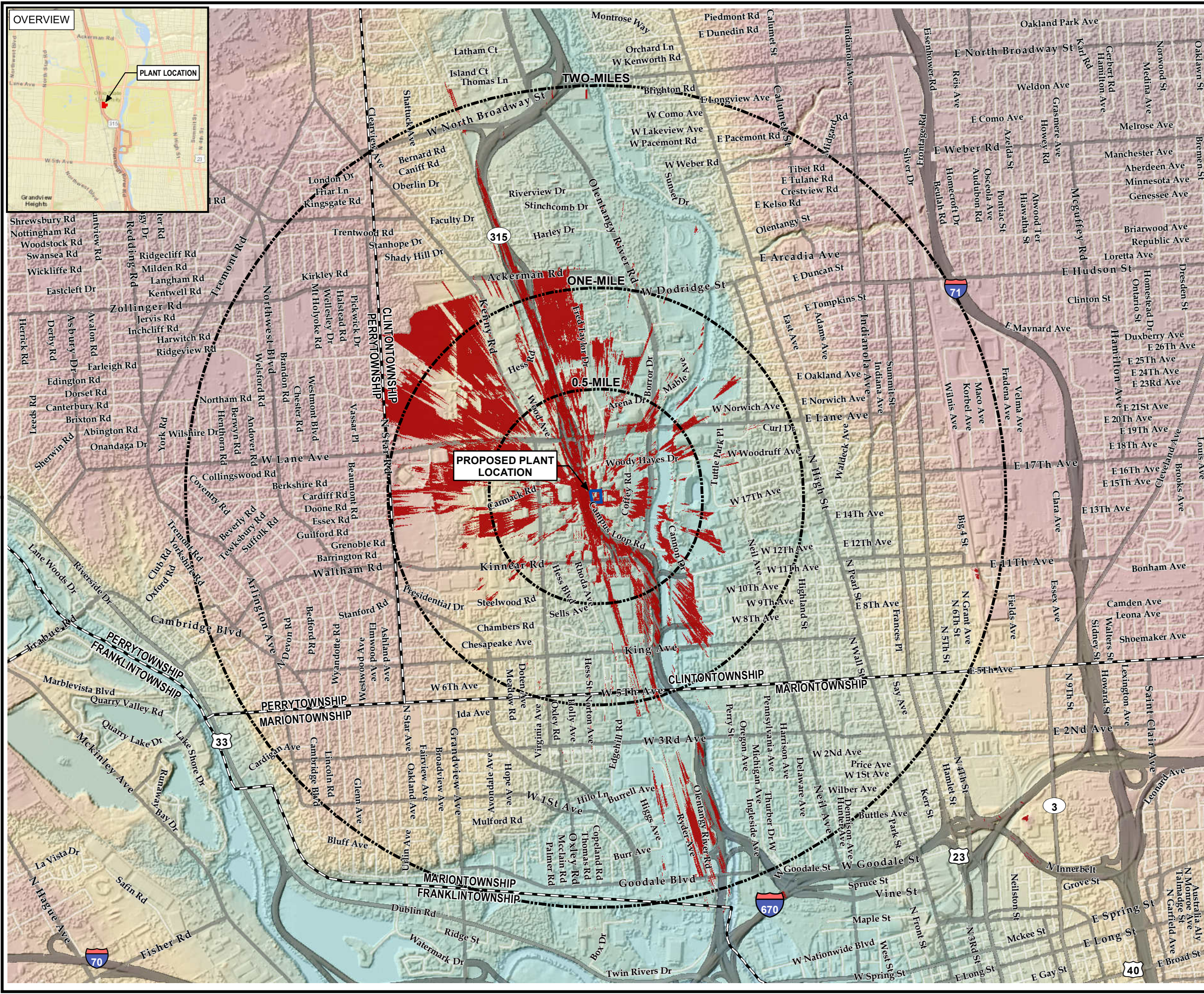
Data Sources: ESRI, OHPO, TRC

ENGIE Services, Inc.
The Ohio State University
Smart Campus Combined
Heat and Power (CHP) Project
Columbus, Franklin County, Ohio

Figure 4
 Cultural Resource Surveys
 Within APE

Created By: JVanDeveer on 2/5/2019

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 Pittsburgh, PA 15220
Results you can rely on



LEGEND

- PROPOSED PLANT
- BUFFERS AROUND PROPOSED PLANT
- TOWNSHIP
- AREAS WITH POTENTIAL VISIBILITY

REGION TERRAIN

- HIGH ELEVATION: 890' MSL
- LOW ELEVATION: 690' MSL

NOTES

- TOPOGRAPHIC INFORMATION FROM LIDAR LAS DATA PROVIDED BY OHIO GEOGRAPHICALLY REFERENCED INFORMATION PROGRAM (OGIP), 2007.
- THE VIEWSHED ANALYSIS WAS CONDUCTED USING THE DATA EXTRACTED FROM THE LIDAR DATA. NON-GROUND AREAS ARE REPRESENTED AS THE DIFFERENCE BETWEEN THE FIRST-RETURN SURFACE AND THE BARE-EARTH SURFACE. AN OBSERVER HEIGHT OF 5.5' WAS USED FOR THE ANALYSIS.
- HEIGHTS OF PLANT FEATURES VARIED AND WERE BASED ON THE CURRENT DESIGN INFORMATION AT THE TIME OF MAPPING, MAXIMUM STACK HEIGHT IN THE MODEL IS 115'.
- INFORMATION PRESENTED HERE IS THE RESULT OF A DESKTOP ANALYSIS AND HAS NOT BEEN GROUND-TRUTHED.

1" = 2,500'
1:30,000

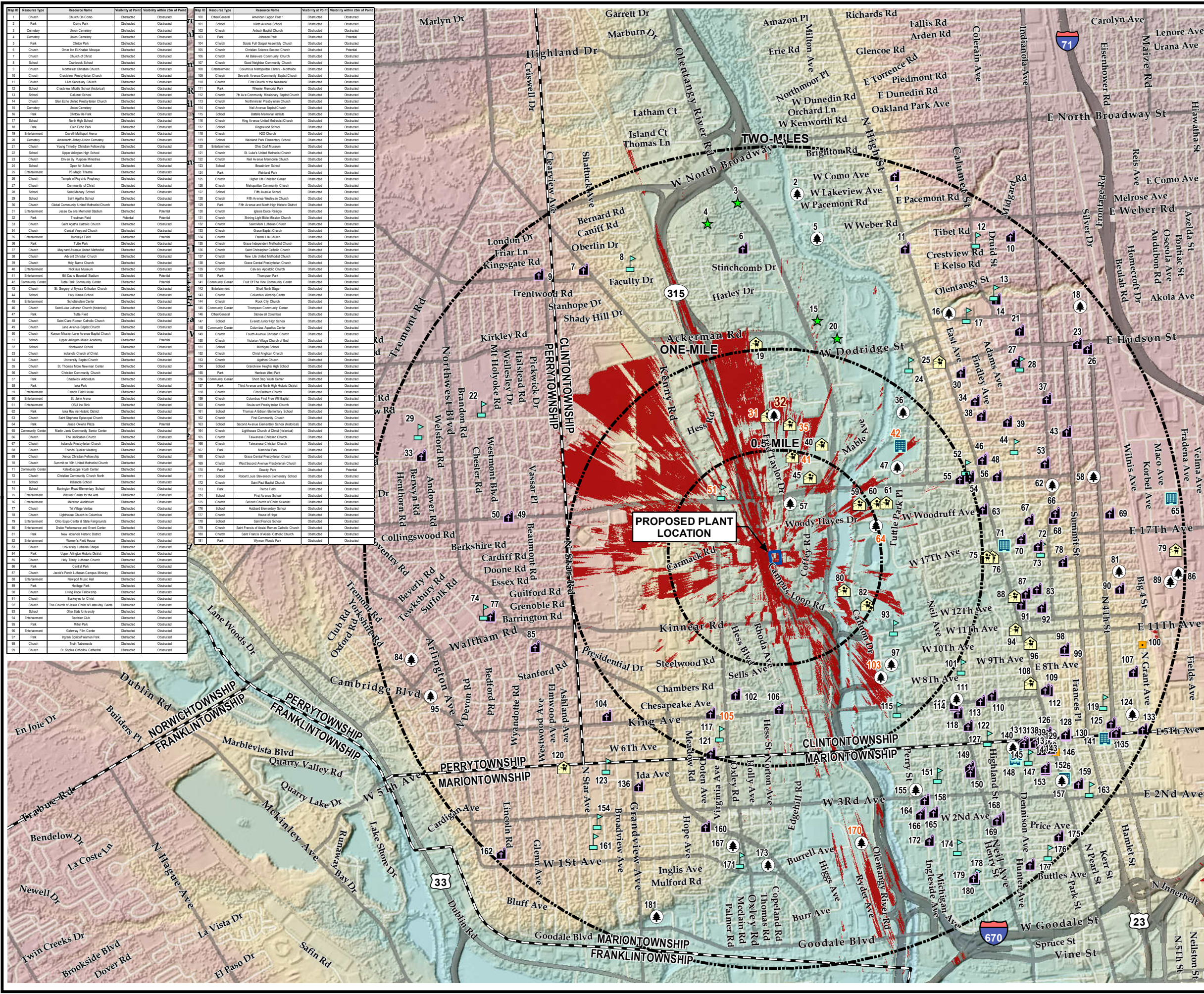
PROJECT: THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH

TITLE: **VIEWSHED ANALYSIS**
WITHIN 2 MILES OF PROJECT SITE

DRAWN BY: J. PAPEZ	PROJ. NO.: 314315
CHECKED BY:	FIGURE 5
APPROVED BY:	
DATE: MAY 2019	

670 Morrison Rd, Suite 220
Gahanna, OH 43230
Phone: 614.655.5360
www.trcsolutions.com

FILE NO.: 314315-003\VS.mxd



LEGEND

- PROPOSED PLANT
- BUFFERS AROUND PROPOSED PLANT
- TOWNSHIP
- AREAS WITH POTENTIAL VISIBILITY

REGION TERRAIN

- HIGH ELEVATION: 890' MSL
- LOW ELEVATION: 690' MSL

VISUAL RESOURCE INVENTORY LOCATIONS

- Cemetery
- Church
- Community Center
- Entertainment
- Park
- School
- Other/General

NOTES

- TOPOGRAPHIC INFORMATION FROM LIDAR LAS DATA PROVIDED BY OHIO GEOGRAPHICALLY REFERENCED INFORMATION PROGRAM (OGIP), 2007.
- THE VIEWSHED ANALYSIS WAS CONDUCTED USING THE DATA EXTRACTED FROM THE LIDAR DATA. NON-GROUND AREAS ARE REPRESENTED AS THE DIFFERENCE BETWEEN THE FIRST-RETURN SURFACE AND THE BARE-EARTH SURFACE. AN OBSERVER HEIGHT OF 5.5' WAS USED FOR THE ANALYSIS.
- VISUAL RESOURCE INVENTORY POINTS ARE BASED ON INFORMATION FROM USGS NATIONAL STRUCTURES DATASET (NSD), 2019, AND PUBLIC PLACES FROM THE CITY OF COLUMBUS, 2019. FEATURE TYPES LIKELY TO BE VISUAL RECEPTORS WERE SELECTED FROM EACH AND GENERALIZED FOR USE IN THIS MAP.
- INFORMATION PRESENTED HERE IS THE RESULT OF A DESKTOP ANALYSIS AND HAS NOT BEEN GROUND-TRUTHED.

0 2,500 5,000 Feet
1" = 2,500'
1:30,000

PROJECT: THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH

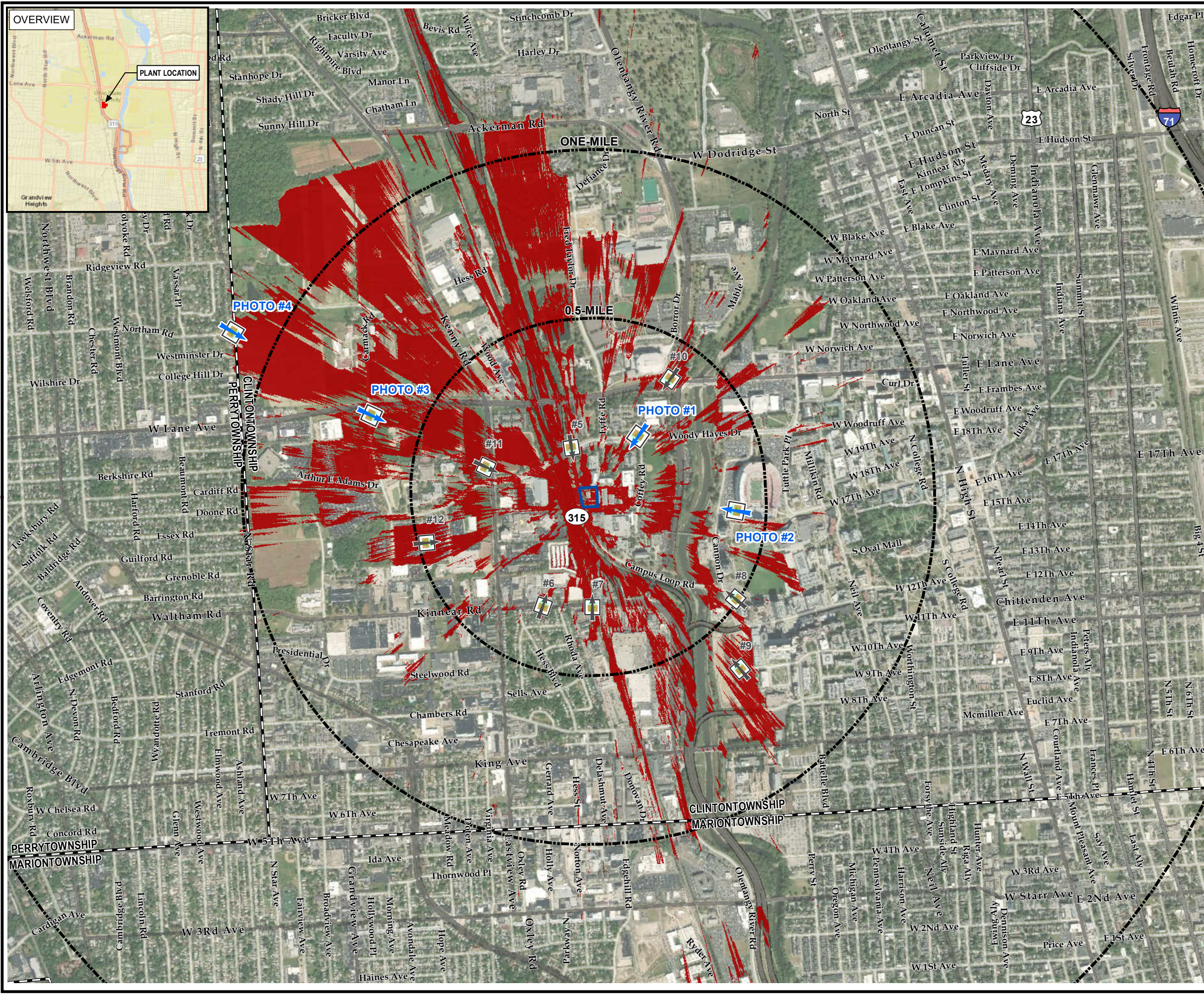
TITLE: POTENTIAL AESTHETIC/VISUAL
RESOURCE IMPACTS

DRAWN BY: J. PAPEZ PROJ. NO.: 314315
CHECKED BY:
APPROVED BY:
DATE: MAY 2019

FIGURE 6

TRC
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Gahanna, OH 43230
Phone: 614.655.5360
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FILE NO.: 314315-004\VS.mxd



LEGEND

- PHOTO SIMULATION LOCATION
- OTHER PHOTOGRAPH LOCATION
- PROPOSED PLANT
- BUFFERS AROUND PROPOSED PLANT
- TOWNSHIP
- AREAS WITH POTENTIAL VISIBILITY

NOTES

- TOPOGRAPHIC INFORMATION FROM LIDAR LAS DATA PROVIDED BY OHIO GEOGRAPHICALLY REFERENCED INFORMATION PROGRAM (OGRIP), 2007.
- THE VIEWSHED ANALYSIS WAS CONDUCTED USING THE DATA EXTRACTED FROM THE LIDAR DATA. NON-GROUND AREAS ARE REPRESENTED AS THE DIFFERENCE BETWEEN THE FIRST-RETURN SURFACE AND THE BARE-EARTH SURFACE. AN OBSERVER HEIGHT OF 5.5' WAS USED FOR THE ANALYSIS.
- HEIGHTS OF PLANT FEATURES VARIED AND WERE BASED ON THE CURRENT DESIGN INFORMATION AT THE TIME OF MAPPING, MAXIMUM STACK HEIGHT IN THE MODEL IS 115'.
- INFORMATION PRESENTED HERE IS THE RESULT OF A DESKTOP ANALYSIS AND HAS NOT BEEN GROUND-TRUTHED.

0 1,500 3,000 Feet
1" = 1,500'
1:18,000

PROJECT: THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH

TITLE: **WORK COPY**
VISUAL SIMULATION
PHOTOGRAPH LOCATIONS

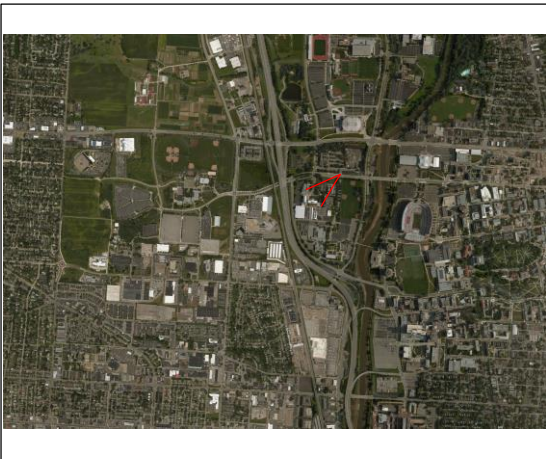
DRAWN BY: J. PAPEZ	PROJ. NO: 314315
CHECKED BY:	FIGURE 7
APPROVED BY:	
DATE: MAY 2019	

670 Morrison Rd, Suite 220
Gahanna, OH 43230
Phone: 614.655.5360
www.trcsolutions.com

FILE NO: 314315-005\VS.mxd



VIEWPOINT LOCATION MAP



PROPOSED CONDITIONS



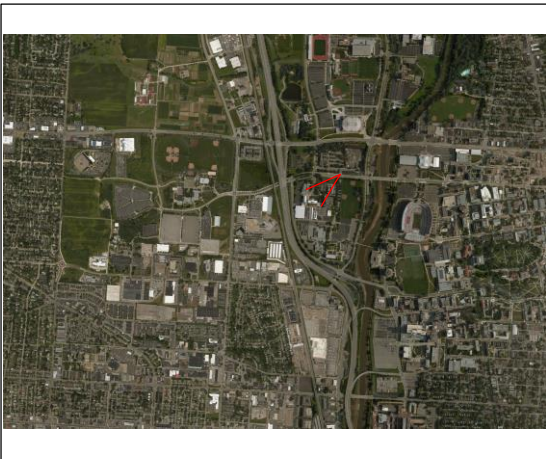
TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	18211441 E 730523 N
<i>Viewpoint Location</i>	Location 1
<i>Viewer Eye Elevation</i>	736 ft msl
<i>Distance to Project</i>	1079 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 1:42pm

THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH



VIEWPOINT LOCATION MAP



EXISTING CONDITIONS



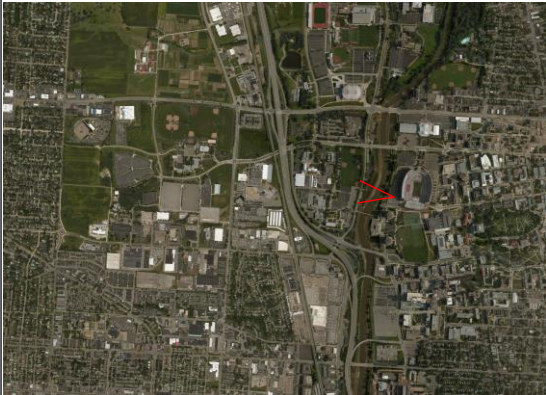
TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	18211441 E 730523 N
<i>Viewpoint Location</i>	Location 1
<i>Viewer Eye Elevation</i>	736 ft msl
<i>Distance to Project</i>	1079 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 1:42pm

THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH



VIEWPOINT LOCATION MAP



PROPOSED CONDITIONS



TECHNICAL INFORMATION

<i>Viewpoint Coordinates in</i>	1820091 E
<i>OH South State Plane feet</i>	730471 N
<i>Viewpoint Location</i>	Location 2
<i>Viewer Eye Elevation</i>	723 ft msl
<i>Distance to Project</i>	2213 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 2:22pm

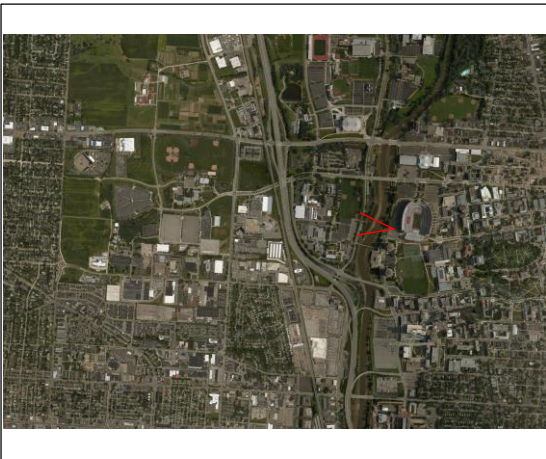
THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH

PHOTO LOCATION 2: EXISTING CONDITIONS

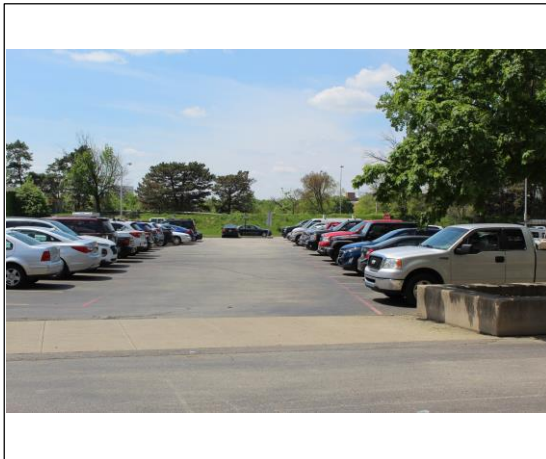




VIEWPOINT LOCATION MAP



EXISTING CONDITIONS



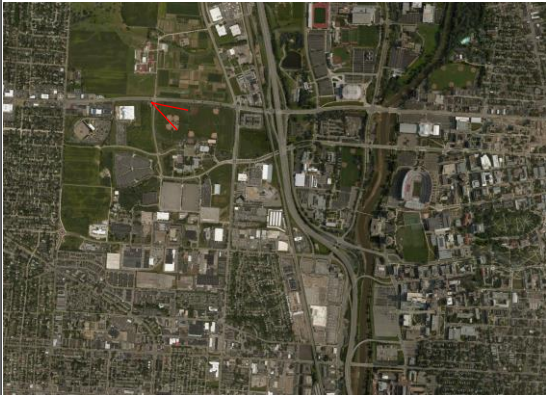
TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	1820091 E 730471 N
<i>Viewpoint Location</i>	Location 2
<i>Viewer Eye Elevation</i>	723 ft msl
<i>Distance to Project</i>	2213 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 2:22pm

THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH



VIEWPOINT LOCATION MAP



PROPOSED CONDITIONS



TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	1820091 E 730471 N
<i>Viewpoint Location</i>	Location 3
<i>Viewer Eye Elevation</i>	795 ft msl
<i>Distance to Project</i>	3518 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 12:44pm

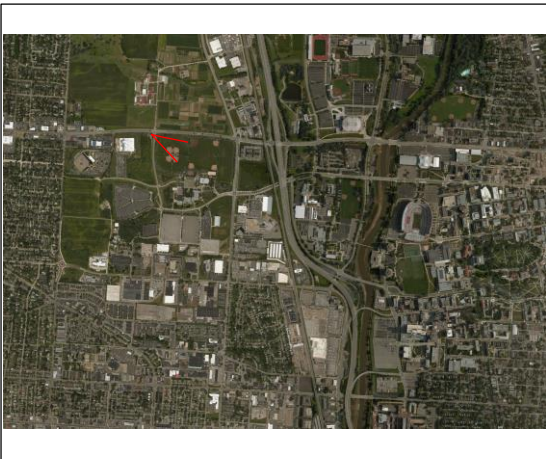
THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH

PHOTO LOCATION 3: EXISTING CONDITIONS





VIEWPOINT LOCATION MAP



EXISTING CONDITIONS



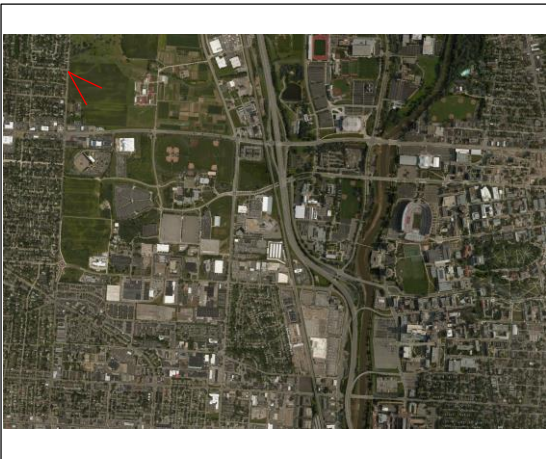
TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	1820091 E 730471 N
<i>Viewpoint Location</i>	Location 3
<i>Viewer Eye Elevation</i>	795 ft msl
<i>Distance to Project</i>	3518 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 12:44pm

THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH



VIEWPOINT LOCATION MAP



PROPOSED CONDITIONS



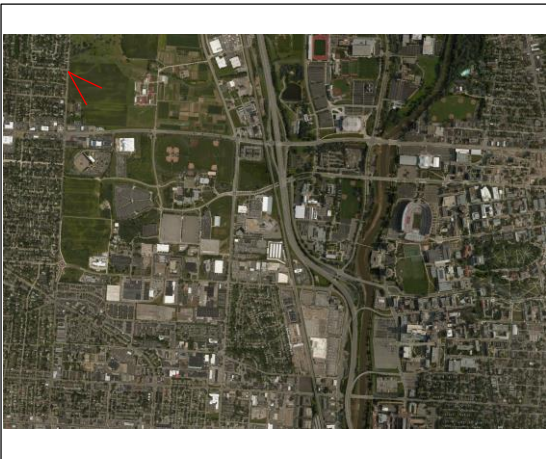
TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	1820091 E 730471 N
<i>Viewpoint Location</i>	Location 4
<i>Viewer Eye Elevation</i>	829 ft msl
<i>Distance to Project</i>	6016 feet
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<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 12:50pm

THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH



VIEWPOINT LOCATION MAP



EXISTING CONDITIONS



TECHNICAL INFORMATION

<i>Viewpoint Coordinates in OH South State Plane feet</i>	1820091 E 730471 N
<i>Viewpoint Location</i>	Location 4
<i>Viewer Eye Elevation</i>	829 ft msl
<i>Distance to Project</i>	6016 feet
<i>Camera Model</i>	Canon EOS Rebel T6
<i>Lens Setting</i>	48.3 mm
<i>Date/Time</i>	5-6-2019 12:50pm

THE OHIO STATE UNIVERSITY
COMBINED HEAT AND POWER PROJECT
COLUMBUS, OH



In reply refer to
2019-FRA-45588-2

October 31, 2019

Mike Sponsler
TRM Environmental, Inc.
690 Taylor Road
Gahanna, Ohio 43230

Dear Mr. Sponsler,

**RE: OSU SmartCampus Combined Heat and Power Project, Lay Down Area,
Columbus, Franklin County, Ohio**

This is in response to correspondence, received on October 23, 2019, regarding the equipment lay down area associated with the proposed gas fired combustion turbines and associated facilities in Columbus, Franklin County, Ohio. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information provided, I agree with the recommendation that no further archaeological work is necessary in the proposed project area. It is my opinion that the proposed project will not affect historic properties. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2000, or by email at nyoung@ohiohistory.org

Sincerely,

A handwritten signature in blue ink that reads "Nathan J. Young".

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

HOLLEY Caitlin (Engie North America)

From: Sponsler, Mike <MSponsler@trccompanies.com>
Sent: Thursday, October 17, 2019 12:12 PM
To: nyoung@ohiohistory.org
Cc: HOLLEY Caitlin (Engie North America); NUNLEY Bryceson (ENGIE North America); Wood, Thomas; Borchers, Dylan; Biondich, Curtis; NAYAR Ryan (ENGIE North America); SCOTT Laura (ENGIE North America)
Subject: 2019-FRA-45588: Ohio State University, Combined Heat and Power Project, OPSB Application
Attachments: Updated -106_ProjectSummaryForm_OSU CHP Project 2019 10 17.pdf

Good Afternoon Nathan,

Attached is a request for additional guidance with regard to the referenced project. I will follow up immediately with a hardcopy in accordance with OHPO requirements.

At the time of initial submittal a laydown area had not been identified. The Attached document shows the selected laydown area and updates the proposed disturbed acreage table.

If you have questions or do not receive the hard copy, please contact me at any time.
Thank you.

Best,
Mike Sponsler
Senior Project Manager



690 Taylor Road, Suite 100, Gahanna, OH 43230
C 614.623.0485
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)



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Gahanna, OH 43230

T 614.335.6223
TRCcompanies.com

Mr. Nathan J. Young
Ohio Historic Preservation Office
Resource Protection and Review
800 E. 17th Avenue
Columbus, OH 43211-2497

October 17, 2019

**RE: The Ohio State University Combined Heat and Power (CHP) Facility
2019-FRA-45588**

Dear Mr. Young:

This is a follow up to our correspondence regarding the development of a proposed Project on the campus of The Ohio State University (University) dated June 16, 2019. The Project includes the siting of the approximate 1.18-acre CHP Facility with Interconnection System to American Electric Power in Franklin County, Ohio. At the time of our previous request for guidance from your office, a laydown area had not been selected for the Project. An 8.53-acre laydown area has been selected in an existing corn field located about 1,000 feet northwest of the proposed facility site. The proposed laydown area is located at the northeast corner of the intersection of Woody Hayes Drive and Kenny Road on the campus of the University. The site will be used to receive and store equipment, parts and materials for the construction of the CHP and for parking of construction vehicles; the laydown area will be shared between the CHP Facility project and other university construction projects. No permanent structures will be erected on the laydown area. A soils map is provided showing the laydown area.

We are providing an updated Section 106 Project Summary Form and project maps showing the location of the proposed laydown area and an update of disturbed acreage. Given the location of the laydown, the literature review previously conducted in June 2019 is still valid and is attached. We look forward to your advice.

Sincerely,

Michael Sponsler

Mike Sponsler
Project Manager
TRC Companies



OHIO HISTORIC PRESERVATION OFFICE: RESOURCE PROTECTION AND REVIEW

Section 106 Review - Project Summary Form

For projects requiring a license from the Federal Communications Commission, please use FCC Forms 620 or 621. **DO NOT USE THIS FORM.**

SECTION 1: GENERAL PROJECT INFORMATION

All contact information provided must include the name, address and phone number of the person listed. Email addresses should also be included, if available. Please refer to the Instructions or contact an OHPO reviewer (mailto:Section106@ohiohistory.org) if you need help completing this Form. Unless otherwise requested, we will contact the person submitting this Form with questions or comments about this project.

Date: October 2019 **(Update)**

Name/Affiliation of person submitting form: Mike Sponsler / TRC

Mailing Address: TRC Environmental Inc., 690 Taylor Road, Gahanna, Ohio 43230

Phone/Fax/Email: 614-623-0485 / msponsler@trcsolutions.com

A. Project Info:

1. This Form provides information about:

New Project Submittal:

YES

Additional information relating to previously submitted project:

NO

OHPO/RPR Serial Number from previous submission:

N/A

2. Project Name (if applicable):

The Ohio State University Smart_E Campus Combined Heat and Power (CHP) Project

3. Internal tracking or reference number used by Federal Agency, consultant, and/or applicant to identify this project (if applicable): N/A

B. Project Address or vicinity: 40.002074, -83.29015

C. City/Township: City of Columbus

D. County: Franklin County

E. Federal Agency and Agency Contact. *If you do not know the federal agency involved in your project, please contact the party asking you to apply for Section 106 Review, not OHPO, for this information. HUD Entitlement Communities acting under delegated environmental review authority should list their own contact information.*

N/A

F. Type of Federal Assistance. *List all known federal sources of federal funding, approvals, and permits to avoid repeated reviews.*

N/A

G. State Agency and Contact Person (if applicable):

Ohio Power Siting Board (OPSB)

H. Type of State Assistance:

N/A

I. Is this project being submitted at the direction of a state agency **solely** under Ohio Revised Code 149.53 or at the direction of a State Agency? *Answering yes to this question means that you are sure that no federal funding, permits or approvals will be used for any part of your project, and that you are seeking comments only under ORC 149.53.*

YES

J. Public Involvement- Describe how the public has been/will be informed about this project and its potential to affect historic properties. Please summarize how they will have an opportunity to provide comments about any effects to historic properties. (This step is required for all projects under 36 CFR § 800.2):

A Public involvement meeting was held on September 26, 2019 at Fawcett Center at the University. The meeting was announced in the Columbus Dispatch. No comments were received from the public at the meeting about the project.

K. Please list other consulting parties that you have contacted/will contact about this project, such as Indian Tribes, Certified Local Governments, local officials, property owners, or preservation groups. (See 36 CFR § 800.2 for more information about involving other consulting parties). Please summarize how they will have an opportunity to provide comments:

NA

SECTION 2: PROJECT DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

Provide a description of your project, its site, and geographical information. You will also describe your project's Area of Potential Effects (APE). Please refer to the Instructions or contact an OHPO reviewer if you need help with developing the APE or completing this form.

The proposed Project includes the siting of the approximate 1.18-acre CHP Facility with Interconnection System to American Electric Power in Franklin County, Ohio. The proposed Project area is located within an urbanized (developed) area approximately 700 feet (0.13 mile) southeast of the Woody Hayes Drive intersection with John H. Herrick Drive and Vernon L. Tharp Street. The proposed Project will include buried water, electrical interconnection, communication and natural gas lines from the site to the interconnection points installed in

previously disturbed urban land. The buried lines will run along John H. Herrick Drive and beneath the Olentangy River inside an existing conduit to their interconnection points. Minimal tree clearing is anticipated. Construction of the proposed facility is anticipated to commence in May 2020 and be completed by October 2021.

For challenging projects, provide as much information as possible in all sections, and then check the box in Section 5.A. to ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties or if there may be challenging procedural issues related to your project. Please note that providing information to complete all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

A. Does this project involve any Ground-Disturbing activity: YES
(If **Yes**, you must complete all of Section 2.A. If **No**, proceed directly to Section 2. B.)

1. General description of width, length and depth of proposed ground disturbing activity:

Facility construction will disturb approximately 1.18-acre with an additional 0.96 acre of additional construction area within a previously disturbed area. Water, gas and electrical and communications cabling will be buried beneath previously disturbed urban lawns, streets, parking lots and sidewalks. See Attachment 1 for a summary of all proposed disturbances. The laydown area will 8.53 acres within an undisturbed cornfield used for University research and shared with another project.

2. Narrative description of previous land use and past ground disturbances, if known:
Except the laydown area, the entire APE is located within areas of previous impacts associated with urban development.

3. Narrative description of current land use and conditions:

Urban development associated with The Ohio State University facilities. A greenhouse facility is the current land use. Several hoop greenhouses, small compost piles and planting boxes exist on site. The entire facility area is covered with gravel to provide a suitable base for greenhouse operation. Buried cabling and utility line disturbances will be in areas previously disturbed for urban developed of the campus. The laydown area will be on 8.53 acres of cornfield shared with another project.

4. Does the landowner know of any archaeological resources found on the property?
NO

If yes, please describe: NA

B. Submit the exact project site location on a USGS 7.5-minute topographic quadrangle map for all projects. Map sections, photocopies of map sections, and online versions of USGS maps are acceptable as long as the location is clearly marked. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:

1. USGS Quad Map Name: Northwest Columbus

2. Township/City/Village Name: City of Columbus

C. Provide a street-level map indicating the location of the project site; road names must be identified and legible. Your map must show the exact location of the boundaries for the project site. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:

See Maps included in the attached report (Cultural Resources Due Diligence Records Review, SmartE Campus Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019; Attachment 2) and Attachment 3, which is a revised soils map showing the laydown area.

- D. Provide a verbal description of the APE, including a discussion of how the APE will include areas with the potential for direct and indirect effects from the project. Explain the steps taken to identify the project's APE, and your justification for the specific boundaries chosen:

The APE for indirect effects is based primarily of those resources and areas that could potentially fall within line of sight of the proposed facility (See attached Preliminary Viewshed Analysis Map). The APE for direct effects consists of the approximately 1.18 acres of permanently built area, which comprises all areas of the facility final footprint. Additional disturbance for associated areas are summarized in Attachment 1. The shared laydown area of 8.53 acres will be located in an undisturbed cornfield.

- E. Provide a detailed description of the project. This is a critical part of your submission. Your description should be prepared for a cold reader who may not be an expert in this type of project. The information provided must help support your analysis of effects to historic properties, not other types of project impacts. Do not simply include copies of environmental documents or other types of specialized project reports. If there are multiple project alternatives, you should include information about all alternatives that are still under active consideration:

A Combined Heat and Power (CHP) major utility facility is proposed to be installed on the campus of The Ohio State University (OSU). Two Siemens SGT 700 gas-fired combustion turbine generators are proposed for installation. The permanent CHP site is 1.18 acres on an area previously disturbed for the Howlett Greenhouse operations on the campus of OSU. Additional disturbance area for construction will total 0.96 acre. The site is on the corner of John H. Herrick Drive and Vernon L. Tharp Street adjacent to the Galbreath Equine Center, Parker Food and Science Technology Building, Howlett Greenhouses and Howlett Hall. The facility site is a gravel pad within a chain link fence that contains greenhouses and related structures (e.g. composting bins). The two gas-fired turbines will be enclosed in a building that is 60 feet tall. The facility will have two banks of cooling towers which will be located on the roof of the facility. Both cooling tower banks will extend 27 feet above the roof. Two stacks will be a total of 115 feet in height. Other associated activities will consist of buried lines except where the communications and electrical cables will be inserted within an existing conduit beneath the Olentangy River. The buried lines will be located in previously disturbed areas through streets, roads, sidewalks and parking lots within the urbanized area developed for the campus. An 8.53 acre shared laydown area will be developed in an undisturbed cornfield as shown on the attached maps. The disturbance areas including additional construction area and associated areas are included in Attachment 1.

SECTION 3: IDENTIFICATION OF HISTORIC PROPERTIES

Describe whether there are historic properties located within your project APE. To make that determination, use information generated from your own Background Research and Field Survey. Then choose one of the following options to report your findings. Please refer to the Instructions and/or contact an OHPO reviewer if you are unsure about how to identify historic properties for your project.

See the attached Cultural Resources Due Diligence Records Review, SmartE Campus Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, April 2019.

If you read the Instructions and you're still confused as to which reporting option best fits your project, or you are not sure if your project needs a survey, you may choose to skip this section, but provide as much supporting documentation as possible in all other Sections, then check the box in Section 5.A. to request preliminary comments from OHPO. After reviewing the information provided, OHPO will then offer comments as to which reporting option is best suited to document historic properties for your project. Please note that providing information to complete this Section will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

Recording the Results of Background Research and Field Survey:

- A. **Summary of discussions and/or consultation with OHPO** about this project that demonstrates how the Agency Official and OHPO have agreed that no Field Survey was necessary for this project (typically due to extreme ground disturbance or other special circumstances). Please **attach copies** of emails/correspondence that document this agreement. You must explain how the project's potential to affect both archaeological and historic resources were considered.

This Project is in the early stages of development and no cultural resources field studies have been undertaken at this time; however, a visual impact assessment was completed for the surrounding 2-mile area. (See the attached Cultural Resources Due Diligence Records Review, SmartE Campus Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019 and the attached Figures and Photosimulations). A previous form submission, literature review and presentation of the visual study received a determination from the OHPO that no further studies are required (See Attachment 4). This revised form includes an additional 8.53-acre shared laydown area where we are seeking OHPO input and advice.

- B. **A table that includes the minimum information** listed in the OHPO Section 106 Documentation Table (which is generally equivalent to the information found on an inventory form). This information must be printed and mailed with the Project Summary Form. To provide sufficient information to complete this Section, you must also include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated in the project APE.

No field surveys have been conducted to date. See the attached Cultural Resources Due Diligence Records Review, SmartE Campus Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019 and the attached Figures and Photosimulations).

- C. **OHI (Ohio Historic Inventory) or OAI (Ohio Archaeological Inventory) forms-** New or updated inventory forms may be prepared using the OHI pdf form with data population capabilities, the Internet IForm, or typed on archival quality inventory forms. To provide sufficient information to complete this Section, you must include summary observations from your field survey and background research. You must also include eligibility determinations for each property that was evaluated in the project APE.

No field surveys have been conducted to date. See the attached Cultural Resources Due Diligence Records Review, SmartE Campus Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019 and the attached Figures and Photosimulations).

- D. **A historic or archaeological survey report** prepared by a qualified consultant that meets professional standards. The survey report should meet the Secretary of the Interior's Standards and Guidelines for Identification and OHPO Archaeological Guidelines. You may also include new inventory forms with your survey, or update previous inventory forms. To complete this section, your survey report must include summary observations

from your field survey, background research and eligibility determinations for each property that was evaluated within the APE.

No field surveys have been conducted to date. See the attached Cultural Resources Due Diligence Records Review, SmartE Campus Combined Heat and Power (CHP) Project, City of Columbus, Franklin, Ohio, June 2019 and the attached Figures and Photosimulations).

- E. **Project Findings.** Based on the conclusions you reached in completing Section 3, please choose one finding for your project. There are (mark one):

Background research in the OHPO Online Mapping System revealed a previously surveyed area associated with the Historic District Evaluation for the City of Columbus (HB00124) located within the eastern portion of the APE boundaries. Based on the urban development within the City of Columbus, thousands of archaeological and architectural resources have been documented within the 16-km (10-mi), 8-km (5-mi), and 0.6-km (1-mi) radii of the project location. However, only six (6) NRHP-listed architectural resources located within the 1-mile radius of the project area. In addition to these resources, three (3) cemetery resources were identified within the 1-mile 0.6-km (1-mi) radius of the project location.

SECTION 4: SUPPORTING DOCUMENTATION

This information must be provided for all projects.

No studies have been undertaken at this time as the project is in preliminary stages of development.

- A. Photographs must be keyed to a street-level map, and should be included as attachments to this application. Please label all forms, tables and CDs with the date of your submission and project name, as identified in Section 1. You must present enough documentation to clearly show existing conditions at your project site and convey details about the buildings, structures or sites that are described in your submission. Faxed or photocopied photographs are not acceptable. See Instructions for more info about photo submissions or 36 CFR § 800.11 for federal documentation standards.
1. Provide photos of the entire project site and take photos to/from historic properties from/towards your project site to support your determination of effect in Section 5.
 2. Provide current photos of all buildings/structures/sites described.
- B. Project plan, specifications, site drawings and any other media presentation that conveys detailed information about your project and its potential to affect historic properties.
- C. Copies or summaries of any comments provided by consulting parties or the public.

SECTION 5: DETERMINATION OF EFFECT

- A. **Request Preliminary Comments.** For challenging projects, provide as much information as possible in previous sections and ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties, if the public has concerns about your project's potential to affect historic properties, or if there may be challenging procedural issues related to your project. Please be aware that providing information in all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

1. We request preliminary comments from OHPO about this project:
YES
2. Please specify as clearly as possible the particular issues that you would like OHPO to examine for your project (for example- help with developing an APE, addressing the concerns of consulting parties, survey methodology, etc.):

Upon OHPO's review of this response to OHPO's questionnaire, we would like to engage in further communications with OHPO and look forward to discussing any comments that OHPO might have regarding methodology for the proposed undertaking.

- B. **Determination of Effect.** If you believe that you have gathered enough information to conclude the Section 106 process, you may be ready to make a determination of effect and ask OHPO for concurrence, while considering public comments. Please select and mark one of the following determinations, then explain the basis for your decision on an attached sheet of paper:

Sufficient data has not yet been compiled to make recommendations regarding a Section 106 Assessment of Effect for this proposed undertaking. We are requesting comments and guidance regarding proposed methodology for the additional 8.53 acres proposed for the laydown area.

No historic properties will be affected based on 36 CFR § 800.4(d) (1).
Please explain how you made this determination:

Not yet determined.

No Adverse Effect [36 CFR § 800.5(b)] on historic properties. This finding cannot be used if there are no historic properties present in your project APE. Please explain why the Criteria of Adverse Effect, [36 CFR Part 800.5(a) (1)], were found not to be applicable for your project:

Not yet determined.

Adverse Effect [36 CFR § 800.5(d) (2)] on historic properties. Please explain why the criteria of adverse effect, [36 CFR Part 800.5(a) (1)], were found to be applicable to your project. You may also include an explanation of how these adverse effects might be avoided, reduced or mitigated:

Not yet determined.

Please print and mail completed form and supporting documentation to:

*Ohio Historic Preservation Office
Attn: Resource Protection and Review Department Head
Resource Protection and Review
800 E. 17th Avenue
Columbus, OH 43211-2497*

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/6/2019 11:40:21 AM

in

Case No(s). 19-1641-EL-BGN

Summary: Application Application Part 15 of 17 - Exhibit T (Part 1 of 2) electronically filed by Ms. Kari D Hehmeyer on behalf of Alexander, Trevor Mr. and THE OHIO STATE UNIVERSITY