



STATE HISTORIC PRESERVATION OFFICE: RESOURCE PROTECTION AND REVIEW

Section 106 Review - Project Summary Form Instructions

The Project Summary Form (PSF) is intended to be used as an organizational tool to help prepare information used by Federal Agency Officials to make decisions about projects under [36 CFR 800](#), regulations implementing Section 106 of the National Historic Preservation Act. The most up to date version of the form and its supporting documents can be found on the [Section 106 Reviews](#) website.

At any time during your project planning process, you are encouraged to [contact the State Historic Preservation Office](#) (SHPO) if you have questions about how to use the Project Summary Form. You may also contact SHPO to talk about how to identify historic properties for your project, consult with the public, or develop alternative procedures for complex projects or programs. Agencies planning large or complex projects are strongly encouraged to contact SHPO early in their project planning process, so that we can discuss alternative survey options that could help you meet your responsibilities under 36 CFR 800.

The form will typically be required by SHPO to facilitate routine reviews of federally assisted projects, but submission of the form does not complete the Section 106 process. You must work with other consulting parties, SHPO and the public to fulfill the requirements of 36 CFR 800. Your project records should demonstrate that you have carried out the consultative process required by the regulations found at 36 CFR 800.

You may use your own word-processing software to complete the form; however, you should NOT change the content of the Project Summary Form. You must complete all required fields. Incomplete submissions to SHPO will trigger a request for additional information and will delay completion of the review. Materials submitted for review will not be returned, so remember to keep a copy of your submission for your own records.

Following our review of the Project Summary Form and its associated documentation, SHPO may request additional information to help us understand your assessment of the project's effect. The regulations give us thirty days to respond to project submissions that meet all the requirements found at 36 CFR 800.11. Incomplete submissions may require the preparation of additional information and analysis. Many simple reviews may be completed with a single project submission. However, complex projects can necessitate extensive consultation about project effects. Please allow sufficient time in your planning schedule to

accommodate the possibility of additional review periods by SHPO and other consulting parties.

Please prepare one copy of the Project Summary Form for each project that is being submitted for review. Please type your responses or generate a form with your information entered. Applicants are encouraged to submit any additional information on additional sheets of paper, labeled with the appropriate section title. All supporting documentation must be labeled with the project's name and should reference the Project Summary Form section that you are supplementing.

Submit the Project Summary Form - with supporting documentation attached - by mail to the address listed on the last page of the PSF form. We are unable to accept any project submissions electronically at this time.

Note: For projects requiring a license from the Federal Communications Commission, you must use [FCC Forms 620 or 621](#), not the Project Summary Form. Other projects that are subject to certain Programmatic Agreements may not need to use this Form. Non-Entitlement Communities typically should not use this form unless their project will also receive federal assistance from non-HUD sources. Please contact SHPO if you are not sure whether you should use this Form.

SECTION 1: GENERAL PROJECT INFORMATION

In order to maintain records about federally assisted projects and properties that are evaluated during their review, SHPO maintains individual project files that are tracked through our project logging system. Please make sure that you complete all information fields that are applicable to your project so that we can make sure that all related submissions are filed together.

All contact information provided must include the name, address, email address and phone number of the person listed. Unless otherwise requested, we will first contact the person that submits this Project Summary Form with any questions or comments about this project. Please make sure that the person whose name is listed within the Project Contact Information box at the beginning of this section is ready to provide us with additional information.

We may also contact the federal officials who are responsible for the regulatory decision-making for this project. Typically, we would be seeking clarification about the status of your project and the timing of its Section 106 review relative to other regulatory requirements. For more complex projects, you can expect federal agency staff to direct the consultation and submit information prepared by applicants and their consultants in support of their own findings.

For challenging projects, you may complete as much information as possible in all Sections, and then check the box in Section 5. A. to ask SHPO 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 SHPO for preliminary comments tends to delay completion of the review process for some projects.

A. Project Info

1. Check "Yes" for a New Project submission.

Check "No" if there is a previous submission associated with your project that we will need to locate in our project files.

If you have any previous correspondence from SHPO that relates to the previous submission, list the SHPO Project ID/RPR Serial Number that can be found on the lower right hand corner of the letter, or include a copy of the letter in your current project submission.

2. **Provide the name of your project**, if it has one. This information will be used by SHPO to help track the project internally and will also be used on our correspondence about the project.
3. **Provide the internal tracking or reference number** used by the Federal Agency, consultant, and/or applicant to identify this project, if applicable. We will use your tracking or reference number on our correspondence about this submission.

- B. Provide the actual address of your project**, if applicable. If no street address exists, then please list the nearest road intersection and its distance and direction from the project. For example- *"Project site is located 3.4 miles south of the intersection of State Route 281 and State Route 65, just northwest of Deshler."*

- C. List the city or township in which the project is located.** Please remember that a mailing address may list a local jurisdiction, while the project footprint is actually located outside the incorporated limits in an adjacent township. In such a situation, then the township would be the appropriate location to list in this section.

- D. List the county or counties in which the project is located.**

- E. Include the name, address, email address and telephone number of the contact person at the federal agency that is funding, licensing, approving or permitting your project.** If you are unsure about which federal agency is involved in the authorization for your project, then please contact the party who is asking you to apply for Section 106 review to obtain this information. Projects not receiving federal funding, nor requiring a federal license, approval or permit, are not typically subject to Section 106 review.

Any HUD Entitlement Communities acting under delegated environmental review authority should list their own contact information. For most projects requiring a license from the Federal Communications Commission, do not use this form. Certain other federal agency programs have unique project submission standards

that are mandated under local, state, or federal Programmatic Agreements. If you have any questions about whether you should be using another submission format, please contact us at or call any reviewer listed in the [Resource Protection Review staff list](#).

- F. **List the specific types of federal assistance that your project is receiving** (CDBG, HOME, Section 202 assistance, Section 404 Permit, etc.) If you are receiving assistance from multiple federal programs (i.e. multiple federal funding sources, or both federal funding and permits), then let us know about all sources of federal assistance.

The Section 106 regulations do allow for one Federal Agency to be designated as a Lead Agency for the purposes of review. We strongly recommend that Agency Officials try to coordinate their Section 106 responsibilities in order to avoid unnecessary multiple reviews. If one agency has been authorized to act as a Lead Agency for this project, then we recommend that this agency should obtain a written consent document from the other Federal Agencies that clearly describes the extent of that authorization and provide a copy of that document with your submission.

- G. The Project Summary Form may also be used to prepare submissions about state projects. [Ohio Revised Code 149.53](#) asks state agencies to cooperate with the Ohio History Connection during the planning and construction of public improvements. ORC 149.53 also encourages agencies and their contractors to work with the Ohio History Connection to conduct archaeological and historic surveys and to notify the Ohio History Connection about archaeological discoveries.

If this project is being submitted for consideration under ORC 149.53, **list the name, address, email address and telephone number of the contact person at the state agency that is funding, licensing, or permitting your project.**

- H. **List the specific type of state assistance that your project is receiving** (Clean Ohio Trails, NatureWorks, Ohio Cultural Facilities Commission grant, etc.)
- I. **Submitted solely under ORC 149.53.** By answering, "Yes" to this question, you acknowledge that your project will not require any federal assistance (funding, licenses, approvals, permits). In response to your submission, we will offer comments and recommendations about your project under ORC 149.53 only.
- J. **Public Involvement.** As part of the Section 106 process, you are responsible for making sure that the general public has an opportunity to learn about your project and its potential to affect historic properties before a project is authorized to proceed. In this section, please tell us how you have provided notice to the public about this project, the level of information that was available and what concerns were expressed. Provide copies of any correspondence regarding the project's effects on historic properties that has been submitted by members of the public, or summaries of any conversations you had with them regarding this project. You may

also include minutes from any public meeting that was held if your project was on the agenda.

For information and guidance about required public involvement in the Section 106 consultation process, see [36 CFR Section 800.2\(d\)](#). For helpful material to distribute to the members of the public who express an interest in the project's effects on historic properties, see the Advisory Council on Historic Preservation's publication: [A Citizen's Guide to Section 106](#).

- K. **Other Consulting Parties.** As part of the Section 106 process, you must plan to involve individuals or organizations with a demonstrated interest in the project or general historic preservation concerns. Typically, at a minimum you should plan to notify landmark commissions within the local jurisdiction, local or regional historic preservation groups, or individual property owners that may be directly affected by the project.

Please tell us how you have provided notice to likely consulting parties about this project, the level of information that was made available to them, and what concerns they expressed. In addition to summarizing your efforts to involve consulting parties in consultation, provide copies of any correspondence regarding the project's effects on historic properties that has been submitted by consulting parties. If additional discussions with consulting parties will occur as part of final project development, please tell us how and when that consultation will occur.

Note that, pursuant to [36 CFR Section 800.2\(c\)](#), the following entities are entitled to consulting party status:

- State Historic Preservation Office
- Indian tribes that may assign significance to properties that may be affected by the project
- Local Government with jurisdiction over the area in which the effects of the project may occur
- Applicants for federal assistance
- Individuals and organizations with a demonstrated preservation, legal, or economic interest in the project, as defined at 36 CFR 800.2(c)(5)

For guidance regarding consulting with Indian Tribes about the effects of the project on historic properties, see the Advisory Council on Historic Preservation's publication "[Consulting With Indian Tribes in the Section 106 Review Process](#)".

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

In order to understand your project's potential for effects and help determine what level of archaeological or architectural survey is necessary to identify historic properties, this section asks you to provide us with detailed information about the project site and a description of the work proposed. Information about your project should be written for a reader who may not be familiar with the type of project or construction that you are

describing. Providing accurate project mapping is especially important, since it is important to know the exact location of the project in order to compare it to existing information about historic properties. It is unlikely that reviewers will visit your project site, so please provide information that clearly describes the project site and location.

You will use all this information to establish an Area of Potential Effects (APE) for your project. The APE is defined as the geographic area or areas within which an undertaking may directly, or indirectly, cause changes in the character or use of historic properties, if any are present. Establish the geographical boundaries and justification for your APE based on the most likely direct and indirect effects that might occur as a result of project activities. In most instances, the area of potential effects is not simply the project's physical boundaries, or right-of-way. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by an undertaking. In defining the APE, you must consider not only physical effects but also visual, auditory, and sociocultural effects (i.e. land use, traffic patterns, public access). In order to make decisions about how to set your project's APE, we recommend that you fully consider the "Criteria of adverse effect" and "Examples of adverse effects" found at [36 CFR 800.5](#).

- A. Tell us whether this project will involve any excavation or other ground-disturbing activities** by checking "Yes" or "No". This will help determine whether the necessity for archaeological survey should be considered for this project. You should also consider whether any borrow or spoil areas may be needed as part of construction and where those areas might be located, if known. If there will be "No" ground-disturbing activities, then you may skip the rest of Section 2. A. and continue completing this form at Section 2. B.
1. Describe the dimensions and nature of any proposed ground disturbing activity, including information about associated construction, such as access roads, sewer lines, etc. This information will help to determine whether it is possible that archaeological resources may be affected by the proposed work.
 2. Describe the previous land use within the project footprint. Historically, was the property agricultural, industrial or residential? Have utility corridors been placed on the property?
 3. Describe the current use and condition of the property.
 4. Ask the landowner if he/she is aware of any artifacts that have been discovered on the property at any point in time. Include their description of items that have been found, if any.
- B. Provide a USGS 7.5 minute quadrangle map with the exact project location clearly marked.** You do not need to submit an entire quadrangle map; rather, the relevant portion of the map printed on an 8.5x11 inch sheet of paper is acceptable, with the project location clearly marked. Map scale must be 1:24000. SHPO offers free access to the [Online Mapping System](#) where this map can be created. Instructions for using this program can be found [here](#). Photocopies are acceptable as long as the map and location are clear. Street maps, plat maps, and Internet street mapping are NOT acceptable substitutes for this map. See the free public access on our [Online Mapping](#) website for full instructions on obtaining a USGS map online.
1. Provide the name of the quadrangle map.

2. List the city/village or the township where your project is located.

- C. Provide a street-level map that clearly shows the location of the project.** You may use a copy of a plat map or a city street map, so long as we could use the map to find the project site (i.e. - we could drive there). Your map should also provide the precise location of the project's boundaries. If the project activities will occur in several locations (i.e. curb and gutter replacement at several places along a roadway), all such locations must be noted. Please ensure that street/road names are included and legible. Define the APE that you have established for this project. This APE map will outline the area that you will study in order to determine whether historic properties might be present (you will present the results of that study in Section 3 of this form.).
- D. Describe the steps taken to identify the Area of Potential Effects and justify the boundaries chosen.** List the types of effects likely to result from the project and provide a discussion of how you determined the geographic area in which each is likely to be present. The terms "not applicable" or "unknown" are not acceptable responses. For more information about meeting the required documentation standards for establishing the Area of Potential Effects for a project, see the Advisory Council on Historic Preservation publication: [Section 106 Regulations: Section by Section Questions and Answers](#).
- E. Provide a detailed written description of the actual activities that will occur as part of your project.** Include any available information about building demolition, rehabilitation, new construction, fills, grading, infrastructure improvements and major landscape changes. You can supplement your written description with any available plans, specifications or concept drawings. Supplemental documents should be labeled and appended to this form.

You may not substitute documents that have prepared for other purposes for the research and analysis that is required to complete this section or the rest of this form. You may only include documents like Environmental Impact Statements or Environmental Surveys for the purposes of supporting your consideration of effects to historic properties.

Only the effects that a project may have on historic properties are given consideration in Section 106 review. Economic benefits and impacts to the natural and social environment are not part of our review unless these have a direct connection to effects on historic properties.

Remember that the SHPO reviewer may not have a working knowledge of your project type and the effects that they are likely to produce. Your description should contain sufficient detail to allow the SHPO reviewer to understand the scope of the project and the actions that will be undertaken to facilitate its construction. Be specific and avoid using generalities.

SECTION 3: IDENTIFICATION OF HISTORIC PROPERTIES

In this section, you will provide a description of the efforts taken to identify historic properties located in the Area of Potential Effects that you have established. A historic property is defined as any prehistoric or historic district, site, building, structure, or object that is listed in, or eligible for listing in, the National Register of Historic Places.

To complete this section, you will need to conduct background research that shows whether any historic properties have previously been identified within your APE. You will also complete a field survey to determine whether there are any historic properties located in the project APE that have not previously been identified. After completing your background research and field survey, you will prepare a list of all properties that need eligibility evaluation within the project's APE.

Using all this information, you will evaluate those properties using the National Register Criteria for Evaluation and prepare eligibility recommendations for each property. You will then report the results of your background research, field survey and eligibility evaluations using one of the options listed in order to complete this section.

Background Research:

It is your responsibility to make a reasonable and good faith effort to identify historic properties. Your background research must include research in records about previously surveyed properties that may be located within your project's APE. (You should also field check their location and condition when you do your field survey).

SHPO maintains extensive records about several different types of resources. Paper files are maintained at our office in Columbus. Access to these files at SHPO (800 E. 17th Ave., Columbus, OH) is free and is available during regular business hours. There is a fee for copying the files.

These records include information about properties that are individually listed in the National Register of Historic Places or listed as part of National Register Historic Districts. We also have records about properties that have been entered into the Ohio Historic and Ohio Archaeological Inventories. We maintain information about formal determinations of eligibility that have been made by the Keeper of the National Register for properties in Ohio, as well as properties that are in the process of being nominated to the National Register. Finally, written reports about the results of previous archaeological and architectural surveys are also filed permanently at SHPO.

Ohio's custom online GIS system allows access to information about properties included in the Ohio Historic and Ohio Archaeological Inventories, as well as the National Register of Historic Places. This GIS system can be accessed through 3, 6, or 12 month paid subscriptions. You can find info about [registering for our online GIS system](#) on our website. You may also obtain PDF versions of records included in this GIS system from SHPO for a fee.

In order to determine whether a property is listed on the National Register of Historic Places

You may obtain access to limited online records Via the [National Register Searchable Database](#) website.

Locally, many jurisdictions maintain information about historic properties that are located in their communities, both those that are already listed in the National Register and those that have been located as part of preliminary surveys. Many local planning agencies, housing programs or development offices have information about historic properties within their jurisdiction. In particular, **Certified Local Governments** are federally certified communities with local historic preservation ordinances and a stated commitment to historic preservation initiatives. These [Ohio CLG communities](#) are listed at our website.

If you're unfamiliar with conducting this type of background research, Ohio has a fee-based [Research Service](#) that offers a comprehensive search of all our state and National Register inventories. Information obtained from the SHPO Record Search Service should be used to facilitate your review of available background research sources. To complete this section, you must still evaluate whether properties located in your project's APE are eligible for or listed in the National Register of Historic Places. Do NOT just mail in the results of the Research Service with the idea that it meets the full requirements of this Section; your eligibility analysis is still required. Finally, we maintain a [list of consultants in Ohio](#) who will conduct research and survey work for historic properties.

Note that only a small percentage of the state's properties are documented in SHPO's files. Therefore, simply searching these files does not fulfill your responsibility to identify historic properties. You must also conduct field survey to examine your project's APE.

Field Survey:

Visit your project area to determine whether there could be any properties within the project's APE that should be evaluated for their eligibility to the National Register of Historic Places. The purpose of field survey is to determine whether there are any historic properties located in the project APE that have not previously been identified. If you have already completed your background research, you should have also confirmed the location and current condition of previously identified properties. Collect photos, condition assessments and other data to help complete other sections of this form.

Field survey is critical in helping you to decide whether you should hire a qualified consultant to conduct a specialized cultural resources survey to evaluate architectural or archaeological resources within your project's APE. It is possible for laypeople to complete this evaluation for simple projects, but we recommend that anyone completing this PSF should have at least an introductory level of training about the Section 106 process.

Eligibility Evaluation:

Use the information gained from your background research and field survey to evaluate whether any property located within the APE for your project may be eligible for inclusion or already listed in the National Register of Historic Places. Sections 3.A. through 3.D. offer you several different methods of reporting the results of your identification effort. In Section 3.E., you will conclude this section by indicating whether any historic properties are present in the project's APE. If there are historic properties, you will need to determine whether your project may have effects on them (See Section 4 Instructions for more info).

When considering properties' eligibility for listing in the National Register, you must take into account both their historic significance and their integrity. Use information found during your background research and observations made during your field survey to [develop contexts](#) to help you assess the properties' National Register eligibility by applying the [National Register Criteria for Evaluation](#). Next, determine whether properties that meet any of the National Register criteria [retain sufficient integrity to convey their significance](#).

If your project is located in a National Register eligible or listed historic district, or is located in a local historic district, it is not necessary to provide information about every structure. Rather, you will identify the district and describe its general characteristics and range of construction dates.

Properties that meet at least one of the National Register criteria and retain sufficient integrity to convey their significance are considered "historic properties" for the purposes of Section 106 review. That is, historic properties that need to be taken into account as part of this consultation process are those properties that are eligible for inclusion or already listed in the National Register of Historic Places.

Remember that you are asking SHPO to concur with your eligibility recommendations. The information that you submit must provide a reasonable basis for SHPO to independently reach an opinion about the eligibility of the properties that you are evaluating. SHPO will review all of this information and decide whether to concur with your eligibility recommendations, disagree with your recommendations or ask for additional information in support of your decisions.

For more information about applying the National Register Criteria for Evaluation and assessing the integrity of historic properties, see [Preservation Brief 15, "How to Apply the National Register Criteria for Evaluation"](#), issued by the National Park Service.

Recording Results of Background Research and Field Survey:

Section 3. A. Report your findings only for projects that clearly have no need for extensive field survey and resource evaluation. For example, if a project involved the installation of mechanical equipment purchased with federal assistance within a modern building, then it would not typically be necessary to conduct a survey to identify historic properties outside that building. Another example might be the construction of paved parking at a site where you have documented a previous building demolition with extensive grading. In that instance, it would not typically be appropriate to conduct any archaeological survey.

This section can be used to report your own opinion that comprehensive work to identify historic properties is not necessary. In most cases using this reporting option, you will indicate in Section 3.E. that "No Historic Properties are Present in the APE" and the determination of effect that you make in Section 5. B. will be "No historic properties will be affected".

You may also use this reporting option to fully document how you conducted early

coordination about your project's identification effort with SHPO. Keep in mind that you must explain how the project's potential to affect both archaeological and historic resources were considered. You should include phone logs, correspondence or emails that were exchanged, in order for us to match your formal PSF submission with our records about your early coordination. Documenting the basis for your decision to use this reporting option is critical; provide full project site descriptions in the supporting documents listed in Section 4.

Section 3. B. Report your findings for projects where you have identified a small number of built properties that need evaluation for their eligibility to the National Register of Historic Places. You may typically use this option only when you have less than 20 built properties to evaluate within your project's APE. For complex projects, you may consult with SHPO reviewers about creating a unique survey methodology for your project that could include the use of tabular inventory data.

You will also provide a narrative summary describing the results from your background research, including updated information about any previously surveyed properties that are located within your project's APE. The results of your field survey will be reported using a table that organizes your observations about specific properties. Your field survey must be keyed to mapping and photos provided in other sections of the PSF. You can access the [Section 106 Documentation Table and Instructions](#) on our website:

Make sure that you provide a clear record of your National Register eligibility recommendations for every property that you evaluated. For any properties that meet at least one of the National Register Criteria for Evaluation, describe any alterations that have been made to the properties over time and discuss how these changes impact the properties' integrity.

Section 3. C. Report your findings when your project APE includes a significant number of built properties that must be evaluated for their eligibility. You may also use this section when you have identified previously surveyed archaeological sites located within the project's APE, but do not recommend new archaeological survey for this project. (SHPO may not concur with that opinion, so please explain the basis for your recommendation).

You may need to complete new or updated OHI ([Ohio Historic Inventory](#)) or OAI ([Ohio Archaeological Inventory](#)) forms for your project. You may update information about previously surveyed properties by recording current data on Continuation Sheets that will be added to the existing inventory forms.

For minor projects, new Ohio Historic Inventory forms may be prepared using the [OHI.pdf form](#) with data population capabilities. However, you may only use this format for projects evaluating less than 20 built properties. Any project evaluating more than 20 built properties OR projects where you are using a cultural resources consultant must use the [Internet IForm](#) to prepare and submit electronic inventory data to SHPO. We recommend that you print copies of draft Internet IForms for the purposes of Section 106 review.

You will provide a narrative summary that describes the results from your background research, including updated information about any previously surveyed properties that are

located within your project's APE. You will also describe the methods that you used to conduct your field survey.

Make sure that you provide a clear record of your National Register eligibility recommendations for every property that you evaluated. For any properties that meet at least one of the National Register Criteria for Evaluation, describe any alterations that have been made to the properties over time and discuss how these changes impact the properties' integrity. Remember that you are asking SHPO to concur with your recommendations. The information that you submit must provide a reasonable basis for SHPO to independently reach an opinion about the eligibility of the properties that you are evaluating.

Section 3. D. Report your findings when you have retained the services of a qualified cultural resources consultant to evaluate properties located within your project's APE in the form of a survey report. Survey reports can evaluate and document archaeological or architectural properties, or both types of resource. All survey reports should meet the Secretary of the Interior's [Guidelines for Identification](#) and SHPO [Archaeological Guidelines](#).

In support of the information and analysis provided in the survey report, the consultant will provide new or updated OHI and OAI forms using the [Internet IForm](#) to prepare and submit electronic inventory data to SHPO. We recommend that you print copies of draft Internet IForms for the purposes of Section 106 review, either included in the report or appended to it.

All reports should provide a narrative summary that describes the results from your background research, including updated information about any previously surveyed properties that are located within your project's APE. You will also describe the methods that you used to conduct your field survey and eligibility recommendations for all surveyed properties. If additional work is recommended, please provide a plan for how consultation will continue, relative to the requirements of the Section 106 process and the federal program rules that are applicable to your project.

Section 3. E. Based on the information that you prepared to complete this section, tell us your finding. Are there any historic properties present in the project's APE? If so, then you should prepare to evaluate your project's potential to affect historic properties to complete Section 5 of this form.

If there are no historic properties present in your project's APE, then you should complete Section 5 B. of this form with a finding that "no historic properties will be affected".

Section 4: Supporting Documentation

The information required by this section should serve as the basis for the findings that you make in Section 3 ("Identification of Historic Properties") and Section 5 ("Determination of Effect"). It is very important that your findings be supported by empirical data to the greatest extent possible and that you provide documentation and analysis to show how you made the decisions that are at the heart of this process.

A. **Photographs.** Faxed or photocopied photographs are not acceptable. Photographs must be color. Printed digital photographs are acceptable provided they have a high dpi, clear resolution, and are large enough to show architectural details. Photographs must provide clear views (i.e. subject of the photograph should not be obscured by shadows, trees, cars, or any other type of obstruction) of all properties 50 years of age or older within the Area of Potential Effects. Remember to label all photographs and key them to your localized map.

1. Photograph the location where the project will be taking place. If the project covers a large area, please provide several views and submit representative streetscape views of the built environment in the Area of Potential Effects to provide the SHPO reviewer with an idea of the architectural context.
2. Provide photographs of properties identified in Section 3. If your project is located in a National Register eligible or listed historic district, or is located in a local historic district, it is not necessary to photograph every structure. Photographs of properties that will be directly affected by the project and streetscape photographs that clearly illustrate the remainder of the district will suffice. Key identified historic properties onto a localized map. This can be the same map that was created in either Section 2. B or C. *If you choose to document properties 50 years of age and older using Ohio Historic Inventory and/or Ohio Archaeological Inventory forms, please attach photographs of individual properties to their respective forms.*

B. **Project Plan.** Include these items so that SHPO can determine if the proposed work conforms to the [*Secretary of the Interior's Standards for the Treatment of Historic Properties*](#). You may also submit a written statement explaining how you applied the Standards to reach your finding. This is particularly helpful when certain aspects of the proposed work are not conventional or place a greater emphasis on cost, life cycle, maintenance or some other factor than on preservation. Note that the Standards apply not only to the rehabilitation of historic properties, but also to new construction in the vicinity of historic properties.

C. **Provide copies of correspondence** submitted by consulting parties and the public so that the SHPO reviewer may understand the basis for their concerns about the project and have access to information regarding the possible presence of historic properties and the likely effects of the project on them prepared by others.

Section 5: Determination of Effect

A. **Requesting preliminary comments from SHPO** provides you with an opportunity to solicit our professional advice about how to resolve complex issues that may be encountered in the Section 106 review process. For instance, we can advise you about dealing with multiple agencies or about managing project consultations that involve additional consulting parties. Using this option is especially helpful in starting consultation about projects that will need more in-depth analysis than what you might easily provide using the Project Summary Form. You may also use this option when you are simply not sure about how to proceed with the evaluation of historic

properties or project effects, or when you want SHPO to help you determine how to proceed.

When you request preliminary comments, that does not mean that SHPO will help you fill in the blanks on your Project Summary Form or do historical research for you. We may call you to discuss your project or request that you meet with our staff. We may also offer written recommendations about possible options that you should consider in completing your project documentation. Make sure that you provide enough information in this section so that we know the basis for your request and can determine how best to respond.

B. Determination of Effect. Select the appropriate response and provide the basis for your finding. Include your evaluation of the project's effect upon historic properties that are located within the Area of Potential Effects. You should provide analysis in this section about the potential effects to each historic property located in the APE, but remember that your determination of effect finding is for the project as a whole. In evaluating the project's potential effects to historic properties, you will need to draw on all of the information you have already gathered in previous Sections about the scope of the project, its Area of Potential Effects and historic properties.

- ***Effect** is defined as "alterations to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register".*
- *An **adverse effect** occurs when an undertaking "may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association".*

When evaluating the impact of the project on historic properties, you must consider both direct (physical) effects and indirect (visual, auditory, and sociocultural) effects that may alter the characteristics of a historic property that qualify it for inclusion in the National Register of Historic Places. In this section, you will consider potential effects on the significant characteristics of the historic properties that you already identified in Section 3. When assessing the effects of the project on historic properties, you should focus primarily on how their significant historic features will be impacted. Will the project diminish or impair them in any way? If so, a finding of "adverse effect" may be warranted. If it is your determination that only a peripheral impact may occur on historic properties in your APE, then you may decide that the more appropriate finding is "no adverse effect".

Evaluating direct effects resulting from project activities can be fairly straightforward, while assessing indirect effects can be more difficult. Visual, auditory, and sociocultural effects primarily impact a historic property's setting, feeling, and/or association – three of the seven aspects of integrity. In order to properly assess indirect effects, it is necessary to determine just how important these aspects of integrity are to a particular historic property.

For example, the largely undeveloped area around a historic farmstead in rural Ohio

may have changed little since it's founding, creating a setting and feeling that is reminiscent of the property's past. Changes to this environment that introduce significant modern elements into the property's surroundings have the potential to impair our ability to experience the setting and feeling of the property (have an adverse effect). However, if the same rural property were located in an area that has experienced considerable modern development, it is unlikely that the property's setting and feeling would still remain intact as character-defining features. Additional changes resulting from a new project would be less likely to affect that property, since they might be lost within our perception of other modern changes in the area.

There are a number of questions that you should consider in completing your evaluation of effect:

- What historic properties were identified in your APE?
- Which features of the historic properties did you determine are critical to conveying their historic significance?
- What project activities during and after construction may have a direct or indirect effect on these historic properties?
- Will archaeological properties be affected by staging or construction activities?
- Will any historic properties be demolished, or will project activities occur within their historic boundaries?
- Did you consider all the potential effects of your project that are reasonably foreseeable?
- If you think that historic properties might be affected by your project, have you considered ways to avoid, minimize or mitigate any adverse effects?
- How did you address concerns expressed by the public and other consulting parties?
- What changes were made to your project to avoid or reduce effects to historic properties?

Examples of projects for which a no historic properties affected finding are warranted:

- Any project for which you did not to identify any historic properties within the Area of Potential Effects in Section 3 of this form.
- Replacement of water and/or sewer lines within the existing right of way inside a historic district. Any significant archaeological resources that may have been present were likely destroyed when the street was originally constructed. Provided that construction activities are carried out in a way that does not damage adjacent buildings, there should be no perceptible changes to the historic district after construction is complete.
- Replacement of a furnace within a house that is listed in the National Register of Historic Places. A furnace does not contribute to a building's historic significance.

Examples of projects for which a no adverse effect finding is warranted:

- Rehabilitation of a historic building that conforms to the Secretary of the Interior's Standards for Rehabilitation, with an emphasis on retention and repair of significant features and replacement in kind, when necessary.
- Construction of a new building within a historic district that is respectful of the character of historic buildings throughout the neighborhood. For example, a single-family house being constructed on a vacant lot on a street lined with wood frame, two-story, gable-front houses with front porches should incorporate as many of these design elements as possible.
- New construction designed in a way that avoids or protects a significant archaeological site.

Examples of projects for which an adverse effect finding is warranted:

- Demolition or destruction of any historic property.
- Rehabilitation of a historic property that does not meet the Secretary of the Interior's Standards for Rehabilitation.
- Construction of a new building or building addition within a historic district that is not in keeping with the architectural and design qualities exhibited in buildings throughout the district.

Additional Guidance

Guidance intended to assist in identifying those aspects of integrity that are of primary importance can be found in [Section VIII: How to Identify the Integrity of a Property](#) of the [National Register Bulletin How to Apply the Criteria for Evaluation](#). Additional guidance regarding the identification of architecturally significant features can be found in the following publications:

- [Preservation Brief 17: Architectural Character, Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character](#)
- [Preservation Brief 18: Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements](#)

This information is particularly helpful when assessing direct effects resulting from the rehabilitation of historic properties.

36 CFR Section 800.5(a) (2) (ii) requires that the [Secretary of the Interior's Standards for the Treatment of Historic Properties](#) [36 CFR Part 68] be applied to projects that result in the alteration of historic properties. The relevant standards for the vast majority of projects receiving federal assistance are the [Standards for Rehabilitation](#). Projects determined to conform to the Standards will have "no adverse effect" on historic properties.

For questions, please contact Resource Protection and Review at
(614) 298-2000 or section106@ohiohistory.org.

Helpful Links

[State Historic Preservation Office – Section 106 Review:](#)

[State Historic Preservation Office Online Mapping](#)

[Advisory Council on Historic Preservation – Working With Section 106](#)

[Section 106 Regulations](#)

[National Register Bulletin 15](#)

[Secretary of the Interior’s Standards for the Treatment of Historic Properties](#)

[Free Topographic Maps and UTM Collection Tools Online](#)

If you find a broken link in this document, please contact us at 614.298.2000 or section106@ohiohistory.org.