CHAPTER 4:

Section 106 Scoping Request

The District Environmental Coordinator (DEC) or other District environmental staff may submit the “Section 106 Scoping Request Form” (Section 106 SRF) to the ODOT-OES cultural resources staff at any time from the early part of the PDP Preliminary Engineering Phase to near the end of the PDP Preliminary Engineering Phase.

The Section 106 SRF is a compilation of information that is intended to be used by the District and ODOT-OES for scoping a project. It is NOT intended to be, to replace, or to be presented as, a Phase I level cultural resources report.

The project scoping information on the Section 106 SRF submitted to ODOT-OES must include all the following components on the form.

- Project Description
- Project Mapping from the PIP:
  - County map(s) showing in-state location too.
  - USGS map(s) (most current 7.5' topo with or without aerial background layer(s); include any appropriate mapping provided by District, prime or project sponsor.)
  - Schematic/conceptual plans*
  - Aerial view(s)* (e.g., from Google Earth, Bing Maps, etc.).
  - Preliminary design plans*.
    (*Include best available of any or all of these three options.)
- Photograph Log (color photos keyed to schematic/conceptual plans, aerial views, or preliminary design plans and showing the landscape and buildings, structures, etc., in the project area). The photo log should be created as part of the Project Initiation Package (see Chapter 3 for more information on the PIP.)
- Results of the Section 106 Records Check (i.e., the cultural resource secondary source information from the PIP form, the map from OHPO GIS system showing resources, study area/APE, tables of known resources, etc.).

(Note: For scoping and budgeting purposes, the compilation of this information on the Section 106 SRF Checklist is expected to average 16-20 hours of work.)

The ODOT District will submit the Section 106 SRF to the cultural resource staff in ODOT-OES. The Section 106 SRF gives ODOT-OES information regarding cultural resources specific to the project area, thereby allowing ODOT-OES and the District to move forward on the project.

ODOT-OES will primarily use the Section 106 SRF in the following ways:

- On many projects, the Section 106 SRF will be used to complete project processing under the Section 106 PA or State Project Agreement. In such cases, OES will issue an IOC to the district indicating that the Section 106 process is complete.
- On other projects the Section 106 SRF information will be used to scope further work (such as a Phase I survey) on a preferred alternative or on feasible alternatives, depending on a project’s PDP path.

When submitting a Section 106 SRF to ODOT-OES, District staff needs to consider what question(s) they would like to have answered. In many cases, they have enough information for ODOT-OES to process the project under the Section 106 PA or State Project Agreement or to provide scoping information for a consultant to conduct additional work. Occasionally, especially early in the process when limited
information is available, the District may simply want guidance in order to move the project forward. In the case of the latter, Districts should indicate this in their correspondence to ODOT-OES.

For general project planning purposes on Path 2 through 5 projects, the Section 106 SRF would occur in conjunction with or around the same time as the Feasibility Study in the PDP Preliminary Engineering Phase. For example, on Path 2 and 3 projects, ODOT-OES could receive the Section 106 SRF prior to or in conjunction with the development of the Feasibility Study. For Path 4 and 5 projects, ODOT-OES could receive the Section 106 SRF after the Feasibility Study is complete. Refer to ODOT’s PDP Manual for more information regarding the Feasibility Study.

For a Path 1 project being processed as a C2 Level CE, the Section 106 SRF should be submitted to ODOT-OES at the beginning of the Preliminary Engineering Phase (a Path 1 project will not have a Feasibility Study). The Section 106 SRF is not required for any PDP Path 1 project being processed as a C1 project under the Programmatic Categorical Exclusion Agreement.

Depending on the particular requirements of a project’s schedule, the project management team will determine when would be the best time to submit the Section 106 SRF to ODOT-OES. The timing of this submission will depend entirely upon the project and be based on the team’s understanding of the project.

Tips for consultants preparing a Section 106 SRF:

- Make sure you have an accurate project description.
- Communicate with your prime, LPA, and/or District; ask questions and provide guidance if needed.
- OES does not need long narratives; however, if something requires explanation, a brief paragraph can be included.
- Use common sense.

Some projects may need to have additional information gathered to help scope the project. The additional information needed will be entirely dependent on the project and could include a review of historic atlases, Sanborn Fire Insurance maps, plat maps, 15’ topographic maps, and/or other pertinent sources. If this additional compilation of information is performed, it should also include preparation of a map of the project area showing any resources identified from this review. If this information is required, consultants will be specifically tasked to provide the data.

Please note that this additional information is not an automatic or absolute addition to the standard Section 106 SRF components listed above and on the form. It will be an added on task if the project management team decides the information is necessary for the project.

Such additional information may be found electronically from local governments, local historical societies, and county auditor’s databases. County soil surveys and any available local history sources might also be consulted. Some of this information may not be available electronically and would require visits to libraries, historical societies, county administration buildings, etc. Additional project area visits may also be needed.

As stated above, the decision to compile this additional scoping information will be made by the Project Manager and the project management team. Once that decision is made this additional information could be compiled by ODOT-OES for ODOT District projects at a District’s request. Consultants could also be tasked to compile this information on District projects and/or local projects, and submit it to ODOT Districts. If the ODOT-OES cultural resource staff needs to use the Section 106 SRF information to scope Phase I history/architecture and/or Phase I archaeological surveys, Chapters 5 and 7 provide guidance on how those next steps will be accomplished in the PDP Preliminary Engineering and Environmental Engineering Phases.