Department of Energy
Washington, DC 20585

November 10, 2026

Brandon Ackermann
Deputy State Historic Preservation Officer
Florida Division of Historical Resources
R.A. Gray Building
500 South Bronough Street
Tallahassee, Florida 32399-0250

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Hanwha Power US, Project Keystone America Facility, Duval County, Florida

DHR File No.: 2024-4168

Dear Mr. Ackermann,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to Hanwha Power US, LLC (Hanwha Power US, or "the Applicant") for the Project Keystone America Facility (the Project), located in Duval County, Florida.

The purpose of this letter is to formally initiate consultation with the Florida State Historic Preservation Officer (SHPO), represented by the Department of Historic Resources (DHR), under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents descriptions of the undertaking, the Area of Potential Effects (APE), the efforts to identify historic properties, and the undertaking's effects on historic properties; and seeks your concurrence with DOE's Finding of No Adverse Effect for this Project.

A cultural resources report is included as Attachment 1. Project maps are included as Attachments 2 and 3. Prior SHPO correspondence is included as Attachment 4.

Previous SHPO Review

The Applicant's cultural resource consultant SWCA Environmental Consultants (SWCA) previously submitted the Project cultural resource report (Attachment 1) to the SHPO to solicit comments for their environmental due diligence review (DHR File No. 2024-4168). In a letter dated November 6, 2024, DHR provided comments to SWCA on the cultural resource survey report for the Project (Attachment 4). At that time, no Federal agency was involved in the Project. Now, the Project is before DOE EDF for consideration of a Federal loan guarantee. DOE EDF has reviewed the Project materials, the prior SHPO comments,

and has confirmed that the Project is within the area previously surveyed and reported under DHR File No. 2024-4168. DOE EDF seeks to avoid duplicative SHPO review, and as such, DOE EDF's finding of effect is consistent with the SHPO review already completed (DHR File No. 2024-4168).

DOE EDF is seeking concurrence from SHPO on the previously stated finding. DOE EDF is providing the below descriptions only to inform the public in accordance with 36 CFR § 800.2(d) and to meet the documentation standards per 36 CFR § 800.11.

Description of the Undertaking

DOE's proposed action is the issuance of Federal financing to the Applicant for the undertaking (i.e., the Project), which includes expanding Applicant facilities supporting the delivery of products such as compressor and power generation equipment to power generation customers, including utilities and Independent Power Producers. The proposed Project site is currently an undeveloped parcel within an existing industrial park.

The overall Project construction footprint encompasses approximately 57.64 acres. The proposed facilities included an approximately 209,220 square-foot building, 177 paved parking spaces, six (6) stormwater management facilities, and a private rail spur connected to CSX rail. The entire 57.64-acre site will be utilized for construction activity, including staging and construction laydown. Construction activities will occur within previously disturbed timberland and managed silvicultural areas previously cleared of vegetation and graded prior to the Project.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Within the APE, DOE distinguishes different survey areas for identifying archaeological and historic architectural resources (hereafter, the "archaeological survey area" and "architectural survey area"). The archaeological survey area is defined as the construction footprint of the Project where potential physical effects caused by ground-disturbing activities may occur, also known as the limits of disturbance (LOD). The architectural survey area includes the area in the Project LOD and may apply a distance buffer, as appropriate, within which potential non-physical effects (e.g., visual, vibrational, auditory, or atmospheric) could occur. These survey areas collectively comprise the APE for the Project.

The Project's archaeological survey area includes the area where potential ground disturbance would occur within the Project site, totaling approximately 57.64 acres. The Project's architectural survey area includes the 57.64-acre LOD plus the visible area within parcels adjacent to the Project.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following four (4) federally recognized Tribes to see if they have an interest in the Project: Coushatta Tribe of Louisiana; Miccosukee Tribe of Indians; Muscogee (Creek) Nation; and Seminole Tribe of Florida.

By separate letter sent concurrently with this submission to the SHPO, DOE has requested Tribal respondents provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and identify any additional Tribes that may share an interest in the Project area so DOE can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or necessary.

Records Search

As part of the Section 106 identification process, the Applicant contracted SWCA to conduct cultural resource surveys. The results of SWCA's investigations are summarized below.

SWCA conducted a search of the Florida Master Site File (FMSF) and various archival sources to identify previously conducted surveys and previously recorded cultural resources and historic properties within a 0.5-mile radius study area surrounding the Project. This background research identified thirty (30) previous cultural resource surveys conducted in the 0.5-mile study area, five of which intersect the Project and overlap the LOD entirely. Eleven (11) previously recorded archaeological sites are located in the study area, none of which are located within the Project LOD. A total of 17 previously recorded historic architectural resources are mapped within the 0.5-mile study area, ten (10) of which are mapped within the 0.25-mile APE or its immediate vicinity. None of these resources have been evaluated by the SHPO for the National Register of Historic Places (NRHP). Additionally, four (4) historic linear resources are present in the 0.5-mile study area, one (1) of which is adjacent to the Project area. No NRHP-listed historic properties or previously recorded historic cemeteries were identified within the study area.

Following the completion of background research, SWCA completed Phase I cultural resources surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. SWCA prepared cultural resources report (Attachment 1) and submitted the report to the DHR for review as part of an early environmental due diligence review (DHR File No. 2024-4168). The results of the field investigations are summarized below.

Archaeological Resources

The archaeological field investigations consisted of pedestrian reconnaissance of the archaeological survey area employing visual inspection of the ground surface and subsurface testing where conditions allowed, following DHR guidelines. DOE EDF notes that SWCA surveyed a total of 230.69 acres as part of the broader environmental due diligence survey area. While SWCA identified one (1) archaeological site (recommended not eligible for the NRHP), the site is not located within the Project APE, which includes the 57.64-acre LOD encompassed within the larger survey area. The LOD is also overlapped by previous survey coverage (see Attachment 1, Figure 14; and Attachments 2 and 3). No archaeological resources have been identified within the APE as a result of prior survey efforts.

Historic Architectural Resources

The historic architectural survey included photographic documentation of above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. The architectural survey identified a total of 11 new resources in the historic Polly Town neighborhood (see Attachment 1, Figure 17); however, this group of historic resources is outside the APE (see Attachments 2 and 3). Furthermore, several large warehouses have been constructed on parcels surrounding the Project since 2023; the interceding modern built environment and existing forest vegetation obscure visibility between the Project and the 11 historic structures, and there is no potential for visual effects. The Project will not visually intrude or otherwise alter the existing industrial character of the surrounding Project area, and therefore would have **no adverse effect** on nearby previously recorded linear resources (DU21310, DU21918, DU21919, and DU22497) and other nearby previously recorded historic houses along Faye Road to the north of the Project (DU21422–21431) with undetermined NRHP eligibility.

Requesting your Concurrence and Next Steps

Based on DOE EDF's review of the efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Adverse Effect, consistent with 36 CFR § 800.5(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the SHPO on the Finding of No Adverse Effect as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter**. In accordance with 36 CFR § 800.3(c)(4), DOE EDF will proceed if no response is received within 30 days.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me via email at EDF_Environmental@doe.gov.

Sincerely,

Alicia Williamson

ALICIA WILLIAMSON

Digitally signed by ALICIA WILLIAMSON
Date: 2026.11.10 10:16:14 -05'00'

for Kara Harris
Environmental Project Manager
Office of Energy Dominance Financing

Attachments
Attachment 1. Cultural Resources Report
Attachment 2. Project Site Plan
Attachment 3. Project Map
Attachment 4. Prior SHPO Comments (DHR File No. 2024-4168)