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May 25, 2022

VIA E-FILING

Ms. Tanowa Troupe
Docketing Division, Ohio Power Siting Board
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Re: *American Transmission Systems, Incorporated's Letter of Notification
Application for a Construction Certificate*
Knox-Nottingham 138 kV Transmission Line Rebuild Project – Kilgore
(Polo Road)-New Stacy BUC Segment
OPSB Case No. 22-0285-EL-BLN

Dear Ms. Troupe:

Please find attached American Transmission Systems, Incorporated's ("ATSI's") responses to Staff's second set of data requests, as received by ATSI on May 16, 2022.

Should the Ohio Power Siting Board desire further information or discussion of this submittal, please contact me at 614-227-1989.

Very truly yours,



Devan K. Flahive

Attachments

ATSI'S RESPONSES TO SECOND SET OF DATA REQUESTS FROM OPSB STAFF

Knox-Nottingham 138 kV Transmission Line Rebuild Project

Kilgore (Polo Road)-New Stacy BUC Segment

Case No. 22-0285-EL-BLN

Requests Dated May 16, 2022:

- 1) Page 18 {Section 4906-6-05 (B)(10)(f)} of the application states, "Consultation with Carroll and Harrison counties is required for floodplain development review." Has the Applicant made contact with these counties (or their floodplain administrators) regarding potential floodplain permitting? Describe the current status of these permits.

RESPONSE: Yes, ATSI's consultant (Jacobs) has been in contact with the Carroll County Floodplain Administrator as well as with the Harrison County Engineer's Office regarding floodplain permitting necessary for the Project and access roads. Jacobs is currently in the process of preparing floodplain applications for submission to both the Carroll County Floodplain Administrator and the Harrison County Engineer's Office in advance of construction. Any necessary permits will be in place prior to construction in these areas.

- 2) How many acres of tree clearing are anticipated for the project? Confirm if all tree clearing will be conducted within the ODNR and USFWS recommended tree clearing dates of October 1 through March 31. If tree clearing is anticipated outside the recommended dates, describe the Applicant's intended course of action.

RESPONSE: Project construction will primarily occur within the existing 100-foot wide ROW; however, minor tree clearing may be necessary for portions of the Project. Trees adjacent to the existing ROW that are dead, dying, diseased, leaning, significantly encroaching, or prone to failure may require clearing to allow for safe operation of the transmission line. ATSI will utilize existing access roads and non-forested areas for any proposed access roads for the Project. Minor tree limb trimming may be needed along existing access roads in order to widen the access to the appropriate width, as required for passage of construction equipment. To mitigate any potential bat roosting habitat impacts, any tree clearing, including any adjacent tree clearing, needed for the Project will occur between October 1st and March 31st to minimize direct impacts to the Indiana bat and other bat species. If tree clearing becomes necessary outside of the bat window, ATSI will coordinate with USFWS and ODNR.

- 3) It is indicated in section 4906-6-05 (B)(10)(e) pg. 17 of the application that "Jacobs is presently mapping the various habitats within the Project's disturbance area to identify any areas of concern relating to the above-listed species. Coordination with ODNR will continue to evaluate appropriate avoidance and minimization measures, including by not limited to sequencing construction activities to address seasonal restrictions to reduce potential impact." Where in the process of developing the referenced mapping is Jacobs? And in response to this mapping, does the Applicant anticipate the need to adhere to any other recommended avoidance dates other than the ODNR and USFWS recommended tree clearing dates?

RESPONSE: At the time of the field surveys, Jacobs' biologists documented land use and general habitats along the Project area. Based on this general assessment, Jacobs is in the initial process of identifying locations of grassland and wetland habitat areas that may be potential habitat for nesting bird species that were identified by ODNR. This habitat assessment is currently being developed and will be provided to ODNR in a follow-up correspondence for the Project once access roads and works areas have been finalized. ATSI's installation of access roads and work pads within any identified grassland and specified wetland habitat areas will take place outside of the corresponding seasonal nesting restrictions of April 15th through August 1st. If construction were to be needed within the seasonal-restricted months, ATSI will install timber matting along these areas prior to April 15, 2023, to avoid impacts to these potential nesting bird species by inhibiting nesting within those work areas.

- 4) Timber matting and low-density vehicles are described to be used in order to prevent permanent impacts to wetlands during construction. How many wetlands are anticipated to be impacted temporarily by either timber matting or use of low-density vehicles? And how many acres of temporary impacts to wetlands are anticipated by construction of the project?

RESPONSE: There are 6 PEM wetland areas that are unavoidable. In these areas, approximately 0.61 acres of wetland will be temporarily disturbed during construction by the installation of timber matting for access road crossings and work pads.

- 5) Confirm if permanent impacts to wetlands are anticipated by construction of the Project. If permanent impacts are anticipated, describe and quantify.

RESPONSE: Yes, from two existing structures that are located within two PEM wetlands (Wetland PB-16 and Wetland PB-25). These two existing structures will be replaced with new structures in the same locations. Permanent wetland impacts will be limited to the structure foundation within Wetland PB-25 (less than 0.001-acre of impact). The new structure installed within Wetland PB-16 will be direct embedded and therefore will not have any new permanent wetland impact.

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Case No(s). 22-0285-EL-BLN

Summary: Correspondence Responses to 2ND Set of Data Requests From Staff
electronically filed by Ms. Devan K. Flahive on behalf of American Transmission
Systems Incorporated