



In reply refer to:  
2020-MLT-49294

September 16, 2020

Amy C. Favret, M.A., RPA  
Jacobs  
2 Crowne Point Court, Suite 100  
Cincinnati, Ohio 45241

RE: Section 106 Review-Holloway-Knox 138kV Transmission Line Rebuild Project, Belmont, Carroll, Columbiana, and Harrison Counties, Ohio

Dear Ms. Favret:

This letter is in response to the correspondence received on August 17, 2020 regarding the proposed 64-mile long Holloway-Knox 138kV Transmission Rebuild Project in Belmont, Carroll, Columbiana, and Harrison Counties, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The proposed project will entail replacing the existing H-frame wood poles with direct embedded steel and drilled shaft H-frame wood poles. The new poles will be installed approximately 10-ft. from the existing poles within the 100-ft. wide right-of-way (ROW). All work will be within the existing ROW except for access roads, which will use existing roads, driveways, or farm lanes. Four pull pads, totaling 0.26-acres, will extend outside of the existing ROW.

A literature review report, *Holloway-Knox 138kV Transmission Line Project, Belmont, Carroll, Columbiana, and Harrison Counties, Ohio* was completed for the entire 64-mile rebuild project. A total of two National Register of Historic Places (NRHP)-listed properties, 165 Ohio Historic Inventory (OHI) properties, two NRHP eligible properties, 43 cemeteries, and 224 Ohio Archaeological Inventory (OAI) sites were identified within the 1.0-mile study area. Of these, one cemetery (Bird/Byrd Cemetery-OGS ID 1381) and two OAI sites (33CO257 and 33CO258) were determined to be within the project ROW. Additionally, one historic architecture survey and 11 Phase I archaeological surveys overlap portions of the ROW.

Sites 33CO257 and 33CO258 are low-density prehistoric lithic scatters previously identified during one of the Phase I surveys. Neither of these sites are near existing poles. Site 33CO257 was recommended for further work, but to date, no additional work has been conducted at the site. As a precautionary measure, a 50-ft. buffer using construction fencing will be placed around site 33CO257 during construction. The Bird/Byrd Cemetery is approximately 151-ft. south of the nearest pole and therefore will not be impacted by the project. Since this cemetery is within the ROW, it is recommended that a 50-ft. buffer using construction fencing also be put up around the cemetery during construction as a precautionary measure.

Due to the nature of the project as a rebuild, it is Jacob's recommendation that no further archaeological or architectural investigations are necessary as the visibility of the existing transmission line should not increase. Our office agrees with this recommendation.

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Based on the information provided, we agree that the project, as proposed, will have no effect on historic properties. No further coordination is required for this project unless the scope of work changes or archaeological remains are discovered during the course of construction. In such a situation, this office should be contacted as required by 36 CFR § 800.13. If you have any questions, please contact me by e-mail at [sbiehl@ohiohistory.org](mailto:sbiehl@ohiohistory.org) or Joy Williams at [jwilliams@ohiohistory.org](mailto:jwilliams@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Stephen M. Biehl". The signature is written in a cursive style.

Stephen M. Biehl, Project Reviews Coordinator (archaeology)  
Resource Protection and Review  
State Historic Preservation Office

cc: Joy Williams, SHPO

RPR Serial No. 1085225

*"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."*

**This foregoing document was electronically filed with the Public Utilities  
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**1/23/2024 3:11:36 PM**

**in**

**Case No(s). 23-1013-EL-BLN**

Summary: Response Responses to Second Set of Data Requests from the Staff of the Ohio Power Siting Board (Exhibit B) electronically filed by Mr. Lawrence B. Hughes on behalf of American Transmission Systems, Inc..