



Legal Department

American Electric Power  
1 Riverside Plaza  
Columbus, OH 43215-2373  
AEP.com

April 3, 2024

Ms. Tanowa Troupe, Secretary  
Ohio Power Siting Board  
180 East Broad Street  
Columbus, Ohio 43215-3793

**Hector Garcia**  
Senior Counsel –  
Regulatory Services  
(614) 716-3410 (P)  
[hgarcia1@aep.com](mailto:hgarcia1@aep.com)

**RE: Proof of Compliance with Condition  
Case No. 18-0031-EL-BTX, 19-2124-EL-BTA, 23-0492-EL-BTA  
Second Amendment to the Pine Ridge-Heppner 138 kV Transmission Line  
Project**

Dear Ms. Troupe:

In satisfaction of Condition (2) of the Staff Report for Amendment #1 of the Project (Case No. 19-2124-EL-BTA), AEP Ohio Transmission Company, Inc. submits this notice and attachment to inform you that coordination with the Ohio History Connection has been completed for the Project.

If you have any questions regarding this information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Hector Garcia

Hector Garcia (0084517), Counsel of Record  
Counsel for AEP Ohio Transmission Company, Inc.

cc: John Jones, Counsel OPSB Staff  
Jon Pawley, OPSB Staff



In reply refer to  
2017-JAC-39987

November 16, 2017

Mr. Ryan J. Weller  
Weller & Associates, Inc.  
1395 West Fifth Avenue  
Columbus, Ohio 43212

**RE: Pine Ridge-Heppner 69kV/138kV Rebuild Project, Liberty and Coal Townships, Jackson County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received September 12, 2017, October 12, 2017, and November 13, 2017 regarding the proposed Pine Ridge-Heppner 69kV/139kV Rebuild Project, Liberty and Coal Townships, Jackson County, 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 4906-4). 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 (16 U.S.C.470 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for the Proposed 6.0 km (3.73 mi) Pine Ridge-Heppner 69kV/138kV Rebuild Project in Liberty and Coal Townships, Jackson County, Ohio* by Weller & Associates, Inc. (2017).

A literature review, visual inspection, shovel probe, and shovel test unit excavation was completed as part of the investigations. One (1) previously identified archaeological sites is located immediately adjacent to the project area. Ohio Department of Transportation (ODOT) staff identified OAI #33JA0153, the Burgess Rockshelter, in 1990. Only limit investigations took place on this rock shelter when it was identified, as the scope of the proposed transportation project was not impacting the site. It is unknown if OAI#33JA0153 is eligible for listing in the National Register of Historic Places (NRHP) but the proposed project will not impact the site. One (1) archaeological site was identified during this survey. OAI#33JA0411 is also a rockshelter site, where prehistoric period cultural material (flake, chert debitage, and possibly fire-cracked rock) was observed on the ground surface. No artifact collection took place and no excavation was completed on the site. Two (2) additional rockshelter overhangs were also identified in the area; however, it is our understanding that no cultural material was identified on the surface of these areas. One overhang is located directly adjacent the project area and one is located within the project area. The overhangs were not subsurface tested for archaeological resources.

OAI#33JA0411 is recommended potentially eligible for listing in the NRHP. Our office agrees with this recommendation and we request additional information before a determination can be made if the site is being adversely affected or being avoided by the proposed project. Detailed information on the proposed structure location (Structure#67) is needed (engineering plans showing the structure location in relation to OAI#33JA0411 would be ideal) and detailed mapping of the proposed access roads. We also recommend the two overhangs, which did not contain artifacts on the surface during visual inspection, also be avoided by the proposed project. If the overhangs cannot be avoided, we recommend archaeological investigation take place to confirm if the overhangs contain any evidence of prehistoric habitation.

RPR Serial No: 1070479, 1071243

Mr. Ryan Weller  
Page 2  
November 16, 2017

Please complete your associated site inventory as soon as possible. Project associated inventory should be completed and submitted concurrent with submission of your survey documentation for our comments. Following IForm submission procedure, please send a notification to the survey manager ([archsurvey@ohiohistory.org](mailto:archsurvey@ohiohistory.org), or directly at [beberhard@ohiohistory.org](mailto:beberhard@ohiohistory.org)) so that the manager is aware your inventory is prepared, complete, and ready for review.

The following comments pertain to the *History/Architecture Investigations for the Proposed 6.0 km (3.73 mi) Pine Ridge-Heppner 69kV/138kV Rebuild Project in Liberty and Coal Townships, Jackson County, Ohio* by Weller & Associates, Inc. (2017).

The investigations consisted of a systematic survey of all properties fifty years of age or older that are situated within 1,000' on either side of the proposed project site. In total, five individual properties of fifty years or age or older were identified within the survey APE that may have a direct line-of-sight to the project. Out of the five properties identified, two were advanced to detailed study. Two newly identified Ohio Historic Inventory (OHI) properties were recorded as part of this survey: JAC0023304 and JAC0023404.

It is Weller's recommendation that JAC0023304 and JAC0023404 are not eligible for inclusion in the NRHP due to relocation from their original setting and loss of material integrity. Our office agrees with Weller's recommendations regarding eligibility.

The results of the architectural investigation identified no historic properties located within the APE that exhibit potential significance for inclusion in the National Register of Historic Places. Therefore, we agree that the project as proposed will have no indirect effects on historic properties.

We look forward to the continued coordination of this project regarding OAI#33JA0411 and the two rockshelter overhangs. If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,



Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

cc: Ron Howard, AEP ([rmhoward@aep.com](mailto:rmhoward@aep.com))

RPR Serial No: 1070479, 1071243

**OHIO HISTORY CONNECTION**

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • [ohiohistory.org](http://ohiohistory.org)



In reply, refer to  
2017-JAC-39987

February 27, 2023

Mr. Ryan J. Weller  
Weller & Associates, Inc.  
1395 West Fifth Avenue  
Columbus, Ohio 43212

**RE: Pine Ridge Switch-Heppner 138kV Transmission Line Project, Liberty and Coal Townships, Jackson County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received February 21, 2023 regarding the proposed access roads for the Pine Ridge Switch-Heppner 138kV Transmission Line Project, Liberty and Coal Townships, Jackson County, 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 following comments pertain to *Addendum Archaeological Investigations for Access Roads Associated with the Pine Ridge SW-Heppner 69kV/138kV Rebuild Project in Liberty and Coal Townships, Jackson County, Ohio* by Ryan J. Weller (Weller & Associates, Inc. 2023).

A literature review, visual inspection, and shovel test unit excavations were completed as part of the investigations. No previously identified archaeological sites are located within the access road project area. One (1) new archaeological site was identified during survey, Ohio Archaeological Inventory (OAI) #33JA0462. The site is located outside of the project area will not be affected by the project. Our office agrees no additional survey is needed as long as the site is avoided.

One (1) previously identified archaeological site is located within the original project area, OAI#33JA0411, a prehistoric rock shelter. It is our office's understanding this site will be avoided by the proposed project. If avoidance is not possible, additional investigations will be needed.

Based on the information provided, we agree that the project as proposed will have no adverse effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Our office requests Weller & Associates, Inc. complete the OAI forms for OAI#33JA0462 as soon as possible. Please notify our office when that form has been completed. If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1097044



In reply, refer to  
2017-JAC-39987

August 21, 2023

Ryan Weller  
Weller & Associates, Inc.  
1395 W. Fifth Ave.  
Columbus, OH 43212  
[rweller@wellercrm.com](mailto:rweller@wellercrm.com)

**RE: Pine Ridge to Heppner 138kV Rebuild Project, Liberty and Coal Townships, Jackson County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received August 7, 2023 and August 8, 2023 regarding the proposed Pine Ridge to Heppner 138kV Rebuild Project, Liberty and Coal Townships, Jackson County, 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 4906-4 & 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 following comments pertain to the *Addendum 2 Archaeological Investigations for Access Roads and Expanded Work Areas Associated with the Pine Ridge SW-Heppner 69kV/138kV Rebuild Project in Liberty and Coal Townships, Jackson County, Ohio* by Ryan J. Weller (Weller & Associates, Inc. 2023). An avoidance plan map was also provided to our office for review.

A literature review, visual inspection, shovel probe and shovel test unit excavation was completed as part of the addendum investigations. No new archaeological sites were identified during survey. The previously identified Ohio Archaeological Inventory (OAI) #33JA0411 was observed and the avoidance plan map confirms the rockshelter site will be avoided by construction activities. OAI#33JA0153, another rockshelter site, will also be avoided as it is not within direct alignment of the proposed corridor.

Based on the information provided, we agree the project as proposed will have no adverse effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Please be advised, this is a Section 106 decision and this review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1099397-1099398

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**4/3/2024 3:54:40 PM**

**in**

**Case No(s). 18-0031-EL-BTX, 19-2124-EL-BTA, 23-0492-EL-BTA**

Summary: Correspondence Proof of Compliance with Condition (2) electronically  
filed by Hector Garcia-Santana on behalf of AEP Ohio Transmission Company, Inc..