

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 1175-021—West Virginia
London/Marmet Hydroelectric Project
Appalachian Power Company

October 17, 2024

VIA USPS First-Class Mail

Mr. Brannon Littleton
American Electric Power
P.O. Box 2021
Roanoke, VA 24022

Mr. Aaron Parsons
West Virginia State Historic Preservation Officer
West Virginia Department of Arts, Culture and History
1900 Kanawha Boulevard, East
Charleston, WV 25305-0300

Subject: Request for Assessment of Adverse Effect Regarding the Marmet development
Sheet Pile Bulkhead Repair Project

Dear Mr. Littleton and Mr. Parsons:

On August 7, 2024, Appalachian Power Company, licensee, filed a request regarding an assessment of adverse effect for the London/Marmet Hydroelectric Project No. 1175.¹ Specifically, the request regards the proposed sheet pile bulkhead repair project at the Marmet development. The London-Marmet Project consists of two developments (London and Marmet), which are located on the Kanawha River in Kanawha and Fayette counties, West Virginia. The project occupies federal lands administered by the U.S. Army Corps of Engineers (Corps).

Project Background

The existing Marmet development consists of: (1) a forebay area protected by a log boom; (2) screened intake structures; (3) a concrete powerhouse containing three

¹ *Appalachian Power Company*, 145 FERC ¶ 62,218 (2013).

turbine-generator units with a total installed capacity of 14.4 megawatts; (4) a 450-long-tailrace; (5) two 45-kilovolt transmission line within a 0.78-mile-long corridor; and (6) appurtenant facilities. The dam, locks, and reservoirs are not part of the licensed hydroelectric facilities.

Article 407 of the project's license requires the licensee to implement the Programmatic Agreement Between the Federal Energy Regulatory Commission (Commission) and the West Virginia Historic Preservation Officer (West Virginia SHPO) for Managing Historic Properties that May be Affected by Issuing a New License to Appalachian Power Company for the Continued Operation of the London-Marmet Hydroelectric Project, and required the licensee to file a Historic Properties Management Plan (HPMP) for Commission approval. On March 31, 2015, the licensee filed a HPMP for Commission approval. On May 13, 2015, the Commission approved the HPMP in an Order Modifying and Approving Historic Properties Management Plan Under Article 407.²

Request

The licensee proposes to restore the Marmet powerhouse bulkhead structure, which involves the decommissioning and partial demolition of the downstream gage house and stabilization of the steel sheet pile (SSP) bulkhead. A grade beam would be added at the SSP and would extend along the downstream section. The licensee would replace the reinforcement tie-rods extending through the SSP and the reinforced concrete facing to the bulkhead walls. In addition, the licensee would temporarily remove the modern metal staircases and public access ramps in proximity, which would be reinstalled. No ground disturbing activities are planned as result of the proposed project.

The licensee consulted with the West Virginia SHPO regarding the proposal to restore the powerhouse bulkhead structure. On July 9, 2024, the West Virginia SHPO stated it reviewed the Architectural Resources and Inventory Report for the proposed project, and concurred with the determination that the Marmet Locks and Dam Facility is eligible for the National Register of Historic Places. In addition, the West Virginia SHPO concurred with the determination both the Gage House and SSP bulkhead are contributing resources to the Marmet Locks and Dam facility. Furthermore, concerning the SSP bulkhead, the West Virginia SHPO concurred with the determination there would be no adverse effect to its historic characteristics, as it was originally designed to include a concrete façade and the proposed repairs would return the bulkhead to its 1934 designed conditions.

With respect to the Gage House, the West Virginia SHPO did not concur with the no adverse effect determination since the proposal would result in the removal of a

² *Appalachian Power Company*, 151 FERC ¶ 62,102 (2015).

contributing feature to the locks and dam facility. The West Virginia SHPO found that since the removal of the Gage House cannot be avoided due to underlying structural issues, mitigation for the adverse effect would be necessary. The West Virginia SHPO recommended the licensee contact the Commission and provide these comments, stating that if the Commission concurs with the West Virginia SHPO findings, the Commission must notify the Advisory Council on Historic Preservation pursuant to 36 C.F.R. § 800.6(a) of the assessment of adverse effect and develop a Memorandum of Agreement. Therefore, the licensee filed the West Virginia SHPO's comments regarding the proposal on August 7, 2024.

Review

In Commission's review, staff find that the dam, locks, and reservoirs are not part of the licensed hydroelectric facilities. Moreover, the Gage House is owned by the Corps and is not part of the project's facilities. Therefore, Commission staff recommend the licensee consult with the Corps regarding mitigation of adverse effects to historic properties under their jurisdiction to ensure compliance with section 106 of the National Historic Preservation Act.

The Commission strongly encourages electronic filing. Please file the requested information using the Commission's eFiling system at <http://www.ferc.gov/docs-filing/efiling.asp>. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY). In lieu of electronic filing, you may submit a paper copy. Submissions sent via the U.S. Postal Service must be addressed to: Debbie-Anne A. Reese, Acting Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Room 1A, Washington, DC 20426. Submissions sent via any other carrier must be addressed to: Debbie-Anne A. Reese, Acting Secretary, Federal Energy Regulatory Commission, 12225 Wilkins Avenue, Rockville, Maryland 20852. The first page of any filing should include docket number P-1175-021.

Thank you for your cooperation. If you have any questions regarding this matter, please contact Jennifer Polardino at (202) 502-6437 or jennifer.polardino@ferc.gov.

Sincerely,

Jot Splenda, Chief
Environmental and Project Review Branch
Division of Hydropower Administration
and Compliance