

**Legal Department** 

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

November 1, 2016

Chairman Asim Z. Haque Ohio Power Siting Board 180 East Broad Street Columbus, Ohio 43215

Hector Garcia Senior Counsel – Regulatory Services (614) 716-3410 (P) (614) 716-2014 (F) hgarcia1@aep.com

Re: Case No. 16-1690-EL-BLN Request for Expedited Treatment: In the Matter of the Letter of Notification for the Amlin-Cole 138 kV Transmission Line Project

Dear Chairman Haque,

Attached please find a copy of the Letter of Notification (LON) for the above-referenced project by AEP Ohio Transmission Company, Inc. This filing and notice is in accordance with O.A.C. 4906-6-05.

A copy of this filing will also be submitted to the executive director or the executive director's designee. A copy will be provided to the Board Staff via electronic message. The Company will also submit a check in the amount of \$2,000 to the Treasurer, State of Ohio, for Fund 5610 for the expedited fees.

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

Respectfully Submitted,

/s/ Hector Garcia

Hector Garcia Counsel for AEP Ohio Transmission Company, Inc.

cc. Werner Margard, Counsel OPSB Staff Jon Pawley, OPSB Staff



# LETTER OF NOTIFICATION FOR THE

# AMLIN – COLE 138KV TRANSMISSION LINE PROJECT

PUCO Case No. 16-1690-EL-BLN

Submitted pursuant to OAC 4906-6-05

**AEP Ohio Transmission Company, Inc.** 

November 1, 2016

#### LETTER OF NOTIFICATION

# AEP Ohio Transmission Company, Inc., Amlin - Cole 138kV Transmission Line Project

AEP Ohio Transmission Company, Inc. ("AEP Ohio Transco") provides this Letter of Notification ("LON") to the Ohio Power Siting Board in accordance with the accelerated requirements of Ohio Administrative Code ("O.A.C.") Chapter 4906-6-05.

## 4906-6-05 (B) GENERAL INFORMATION

B (1) The applicant shall provide the name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements of a letter of notification.

AEP Ohio Transco proposes the addition of a new 138kV line to the vacant side of steel lattice towers that are currently supporting the Beatty - Hayden and Hayden - Hyatt 345kV transmission lines and the installation of new pole structures to allow the new line to exit Cole Station and bypass Hayden Station. The new line called Amlin-Cole 138kV ("Project") will be approximately 10 miles long and will extend from Cole Station in Prairie Township, Franklin County, Ohio to Amlin Station in Washington Township, Franklin County, Ohio. The Project will require the installation of 12 new pole structures and the removal of one steel lattice tower. Figure 1 shows the location of the Project in relation to surrounding roads, populated areas, surface waters, and other features.

The Project meets the requirements for a Letter of Notification (LON) because it is within the types of projects defined by Item (2)(b) of 4906-6-05 Appendix A "Application Requirement Matrix for Electric Power Transmission Lines." This item states:

- (2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing transmission line, or replacing structures with a different type of structure, for a distance of:
  - (b) More than two miles.
- B (2) If the proposed LON is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.

AEP Ohio Transco is proposing to construct the Amlin – Cole 138 kV transmission circuit to provide looped service to Amlin Station, which is currently radially fed from Hyatt Station. This new looped feed will support the interconnection of a large transmission customer, potential future customers, and also AEP Ohio Distribution. The additional circuit will increase service reliability to Franklin County area, specifically NW Franklin County. The transmission project includes establishing Cole Station (PUCO Case No: 16-1558-EL-BLN). Cole Station will be constructed by tapping the Beatty – Hayden 345 kV circuit. The 345/138 kV step down transformer at Cole will provide the 138 kV needed to establish the Amlin – Cole 138 kV circuit.

## B (3) Project Location

The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

Figure 1 shows the location of the Project in relation to existing AEP Ohio Transco electric transmission lines, existing AEP Ohio Transco's Cole, Hayden, and Amlin Stations, as well as surrounding roads, populated areas, surface waters, and other features.

B(4) The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The Project will be an addition to existing transmission line structures located within existing right of way ("ROW") where easement agreements are already in place, and an installation of new structures and conductor wires on property owned by AEP Ohio Transco. The proposed route is best suited for the proposed facility as it limits socioeconomic, ecological, construction and engineering impacts associated with the Project.

B(5) The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

AEP Ohio Transco informs affected property owners and tenants about its projects through several different mediums. Within seven days of filing this LON, AEP Ohio Transco will issue a

public notice in a newspaper of general circulation in the project area. The notice will comply with all requirements under O.A.C. Section 4906-6-08(A)(1-6). Further, AEP Ohio Transco mailed a letter, via first class mail, to affected landowners, tenants, contiguous owners and any other landowner AEP Ohio approached for an easement necessary for the construction, operation, or maintenance of the facility. The letter complies with all the requirements of O.A.C. AEP Section 4906-6-08(B). Ohio Transco also maintains а website (http://aeptransmission.com/ohio/) which provides the public access to an electronic copy of this LON and the public notice for this LON. A paper copy of the LON will be served to the public library in each political subdivision affected by this Project. Lastly, AEP Ohio Transco retains ROW land agents who discuss project timelines, construction and restoration activities with affected owners and tenants. As this project remains entirely on existing AEP Ohio Transco ROW, mail notifications were not sent to land owners, as there was no landowner impact.

# B(6) The applicant shall provide an anticipated construction schedule and proposed inservice date of the project.

Construction will begin about December 2016. The in-service date for the Project is approximately December 2017.

# B (7) The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Figure 1 provides the Project on U.S. Geological Survey (USGS), topographic quadrangle maps Hilliard and Galloway. The Project extends across portions of Prairie, Brown, and Washington Townships, and the cities of Hilliard, Columbus, and Dublin in Franklin County, Ohio. To access project location from Columbus, take I-70W for approximately 9 miles to Exit 91A, Hilliard Rome Road. After 0.4 miles, turn right (west) onto Feder Road. Continue on Feder Road for 1.7 miles and then turn left (south) onto Cole Road. Follow Cole Road for 1.2 miles. Cole Station will be on the south side of the railroad tracks and west of Cole Road. The Beatty – Hayden 345kV line will exit the existing right of way from the south, proceed easterly towards Cole Station, and then enter the station from the south side. The Beatty – Hayden 345kV line and the Amlin - Cole 138kV line will then exit the north side Cole Station, proceed westerly, and then join the existing ROW from the south. From Cole Station, the line runs northerly to Hayden Station. To locate and view Hayden Station from Cole Station proceed north on Cole Road for approximately 1.3 miles, turn right (east) onto Feder Road and proceed for approximately 0.4 miles, turn left

(north) onto Alton Darby Creek Road and follow for approximately 4.3 miles. Turn right onto Scioto Darby Creek Road and proceed approximately 0.4 miles, turn left onto Cosgray Road and proceed approximately 1.9 miles, then turn left onto Hayden Run Road and continue for 0.7 miles. Hayden Station is located on the north side of Hayden Run Road and east of Heritage Trail Metro Park. The Amlin - Cole 138kV line will leave the existing ROW at the first lattice tower (#95) on the south side of Hayden Run Road and proceed northeast, toward Hayden Station, along the west side of the Beatty - Hayden 345kV line. The Amlin - Cole 138kV line will then drop under both the Beatty - Hayden and Hayden - Roberts 345kV lines and proceed southeast toward Hayden Run Road where it will then turn north, and then northeast, where it will then rejoin the existing right of way and the Hayden-Hyatt 345kV line at lattice tower #2. The Amlin - Cole 138kV line will then proceed northerly to the Amlin Station. To locate and view Amlin Station from Hayden Station, proceed east on Hayden Run Road for approximately 0.6 miles, turn left (north) onto Cosgray Road and follow the road for approximately 2.3 miles to Plain City-Dublin Road (OH-161). At Plain City-Dublin Road, turn left (west) and proceed for approximately 0.5 miles, and then turn left onto Crosby Court and proceed south for approximately for .1 miles. The dirt access road on the east side of Crosby Court leads to Amlin Station. The Amlin - Cole 138kV line will enter Amlin Station from the south.

B (8) The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

The Project is to be constructed entirely on property owned by AEP Ohio Transco, and no access easements, options, or other land use agreements are needed. The new 138kV line will be attached to structures that currently support the Beatty - Hayden and Hayden - Hyatt 345kV transmission lines and to new structures that will be installed within the existing transmission line easement (structures 56A, 56D, 56J) and on station property owned by AEP Ohio Transco (structures 1-5, 56B, 56C, 56H, 56I).

- B(9) The applicant shall describe the following information regarding the technical features of the project:
  - (a) Operating characteristics, estimated number and types of structures required and ROW and/or land requirements.

The Project involves the installation of approximately 52,800 feet (10 miles) of 138kV single-circuit electric transmission line and 12 new steel pole structures. New poles will vary in height from 52 to 185 feet. Eleven of the new structures will consist of 15 individual poles placed on concrete foundations. The remaining structure will consist of two directly embedded poles. In total, 17 poles will be installed. Figures 2 through 4 show the types of steel poles to be installed. Figures 5 and 6 show the typical phase arrangements of both the Beatty - Hayden and Hayden - Hyatt 345kV transmission lines with the new Amlin - Cole 138kV line. The Project has the following characteristics:

Voltage: 138kV

**Structure Type:** two galvanized steel on concrete 3-pole structures, nine galvanized steel on concrete single-pole structures, one galvanized steel direct embed 2-pole (H-frame) structure.

**Shield Wire:** (1) 0.646" diameter 96 fiber OPGW (optical ground wire) and (1) 3/8" EHS (extra high strength) will be used as shield wires above the phase conductors.

**Conductor:** (3) 2-Bundled 954,000 cm ACSR 45/7 "Rail"

**Insulators:** Polymer and Porcelain with corona rings, with standard pole and conductor attachments.

(b) For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. This includes:

# (i) Calculated Electric and Magnetic Field Levels

Three loading conditions were examined: (1) normal maximum loading, (2) emergency line loading, and (3) winter normal conductor rating. Normal maximum loading represents the peak flow expected with all system facilities in service; daily/hourly flows fluctuate below this level. Emergency loading is the maximum current flow during unusual (contingency) conditions, which exist only for short periods of time. Winter normal (WN) conductor rating represents the maximum current flow that a line, including its terminal equipment, can carry

during winter conditions. It is not anticipated that this line would operate at its WN rating in the foreseeable future. Loading levels and the calculated electric and magnetic fields ("EMF") are summarized below. The corresponding designs, including normal maximum loading phase configurations are shown in Figures 6 and 7.

Table 1. Ground Clearance, ROW, and Projected Loading Levels

Circuit	Phase Conductor (kCM ACSR)	Ground Clearance*	Right-Of-Way		Line Loading
		(Feet)	Width (Feet)	Edge (Feet)**	Normal (A)
Amlin-Cole 138 kV	(3) 2 bundled 954 kcm ACSR (45/7) "Rail"	33	150	75	310
Beatty- Hayden 345 kV	3) 2 bundled 954 kcm ACSR (45/7) "Rail"	33	150	75	569
Hayden- Hyatt 345 kV	3) 2 bundled 954 kcm ACSR (45/7) "Rail"	3	150	75	398

<sup>\*</sup>Minimum/normal maximum.

The calculated electric and magnetic fields are summarized below in Table 2.

Table 2. EMF Calculations

Amlin-Cole 138kV Circuit & Beatty- Hayden 345 kV Circuit(Figure- 5				
Condition	Line Load (MVA)	Electric Field (kV/m)	Magnetic Field (mG) <sup>a</sup>	
(1) Normal Max. Loading <sup>b</sup>	310/569	0.2/5.5/0.7	27.0/72.6/36.1	
(2) Emergency Loading <sup>c</sup>	402/770	0.2/5.5/0.7	35.7/98.0/48.5	
(3) Winter Normal Conductor Rating <sup>d</sup>	2979/3056	0.2/8.1/0.7	244.1/594.6/247.4	
Amlin – Cole 138 kV Circuit & Hayden - Hyatt 345kV Circuit (Figure 6)				
(1) Normal Max. Loading <sup>b</sup>	310/398	0.3/5.0/0.7	11.2/54.7/16.9	
(2) Emergency Loading <sup>c</sup>	402/711	0.3/5.0/0.7	13.2/93.1/32.2	
(3) Winter Normal Conductor Rating <sup>d</sup>	2979/3056	0.3/7.8/0.7	138/665.4/144.3	

<sup>\*\*</sup>Distance from centerline to ROW edge.

### B (9)(b)(ii) Design Alternatives

A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and ROW width.

Design alternatives were not considered due to EMF strength levels. Transmission lines, when energized, generate EMF. Laboratory studies have failed to establish a strong correlation between exposure to EMF and effects on human health. However, some people are concerned that EMF have impacts on human health. Due to these concerns, EMF associated with the new circuits was calculated in the table above. The EMF was computed assuming the highest possible EMF values that could exist along the proposed transmission line. Normal daily EMF levels will operate below these maximum load conditions. Based on studies from the National Institutes of Health, the magnetic field (measured in milliGauss, or mG) associated with emergency loading at the highest EMF value for this transmission line, is lower than those associated with normal household appliances like microwaves, electric shavers and hair dryers. shavers and hair dryers. For additional information regarding EMF, the National Institute of information posted their http://www.niehs.nih.gov/health/topics/agents/emf/. Additionally, information on electric and AEP fields available Ohio's magnetic is on website: https://www.aepohio.com/info/projects/emf/OurPosition.aspx. The information found on AEP Ohio's website describes the basics of electromagnetic field theory, scientific research activities, and EMF exposures encountered in everyday life. Similar material will be made available for those affected by the construction activities for this Project.

#### B (9)(c) The estimated capital cost of the project.

The capital costs estimate for the proposed Project, comprised of applicable tangible and capital costs, is approximately \$15,000,000.

<sup>&</sup>lt;sup>a</sup> EMF levels calculated at left ROW edge, maximum, and right ROW edge at one meter above ground - assuming balanced currents and nominal voltages. Electric fields reflect normal and emergency operations; lower electric fields are expected during emergency conditions when one mutually-coupled line is out of service.

<sup>&</sup>lt;sup>b</sup> Peak load expected with all system facilities in service; daily/hourly flows fluctuate below this level.

<sup>&</sup>lt;sup>c</sup> Maximum current flow during unusual/contingency conditions, which last for short periods of time.

d Maximum current flow that a line, including its terminal equipment, can carry during winter conditions.

## B (10) The applicant shall describe the social and ecological impacts of the project:

(a) Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Project is located within Brown, Prairie, and Washington Townships, and the cities of Columbus, Dublin, and Hilliard, in Franklin County. There are eight different land uses within 1,000 feet of the centerline of the existing and proposed right of way corridors. Approximately 59% of the uses are agriculture, 19% are residential, 9% are forested, 4% are developed park and open space, 3% are herbaceous, 3% are commercial or industrial, 2% are wetland, and 1% are open water. Additionally, one church and 484 residences were noted within 1,000 feet of the centerline. The corridor crosses 2 active railroads (CSX and Norfolk Southern) and crosses one US Interstate highway, 7 county roads, and 2 township roads. AEP Ohio Transco's consultant prepared a Socioeconomic, Land Use, and Agricultural District Review Report, which is included in Appendix A.

(b) Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

Based on aerial imagery and land use/land cover data, agricultural land within the study area is interspersed relatively evenly between residential, commercial, forested, and open space land throughout the study area and accounts for approximately 59% of the land within the study area. Of the parcels within the study area labeled as agricultural, four (272-000560-00, 240-000261-00, 240-001325-000, and 240-006626-000) are listed by the Franklin County Auditor's Office as agricultural district land parcels. Parcel 560 will not be crossed by the Project and is not expected to be directly impacted by the Project. The three remaining parcels will be crossed by new ROW leading to Cole Station, and two (000261 and 006626) of the three will be directly impacted by the installation of 7 new steel poles placed on concrete foundations. The total amount of agricultural district land expected to be directly impacted by pole installation is approximately 363 square feet or .008 acres. Both parcels to be directly impacted by pole installation are owned by AEP Ohio Transco. The impacts will be permanent and will require AEP Ohio Transco to remove .008 acres from the agricultural district program. Removal from the program is expected to take place in conjunction with the

larger impacts associated with the construction of Cole Station (PUCO Case No.: 16-1558-EL-BLN).

(c) Provide a description of the applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Phase I cultural resource management investigations have been completed by AEP Ohio Transco's consultant for this Project. Investigations took place over several discontinuous locations within existing and proposed right-of-way corridors and proposed access routes for the Project. The archaeological investigations resulted in the identification of 27 previously unrecorded archaeological sites. None of the 27 sites were found to possess qualities of integrity and significance that are necessary to meet the minimum requirements to be considered eligible for the National Register of Historic Places (NRHP) (33 Code of Federal Regulations [CFR] 60.4). None of the sites are considered historic properties as defined by 36 CFR 800.16(1). No further archaeological work are warranted. A copy of the report is provided under Appendix D.

In June 2016 AEP Ohio Transco's consultant conducted addendum Phase 1 investigations for newly proposed reroutes for the Project. During the investigations, six previously unidentified archaeological sites were discovered. None of the sites were found to be eligible for listing in the NRHP or to be considered historic properties as defined by 36 CFR 800.16(1). No further cultural resource management work is warranted. A copy of the report is provided under Appendix D.

(d) Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

This line will be designed, constructed, and operated to meet or exceed the requirements of the National Electric Safety Code, AEP design standards and all applicable Occupational Safety and Health Administration (OSHA) standards.

A Notice of Intent (NOI) will be filed with the Ohio Environmental Protection Agency (OEPA) for authorization to discharge the stormwater under General Permit OHCD000002 (Big Darby Creek). AEP Ohio Transco will coordinate storm water permitting needs with Franklin County and other local government agencies as necessary. AEP Ohio Transco will implement and maintain best management practices as outlined in the project-specific Storm Water Pollution Prevention Plan (SWPPP) to minimize erosion and control sediment to protect surface water quality during storm events. In addition, AEP Ohio Transco will follow groundwater recharge and riparian setback requirements, as established in the general permit, and mitigate for any unavoidable permanent impacts to the setback.

The Project is located within Special Flood Hazard Areas (SFHAs) associated with Hamilton Ditch, Clover Groff Run, and Hayden Run. The Project will permanently impact approximately 95 square feet of the Zone AE SFHA (100-year floodplain) of Hamilton Ditch, near Cole Station, by installing structures 56A and 56D within the floodplain. AEP Ohio Transco will coordinate permitting the impacts and any mitigating that might be required with Franklin County Department of Economic Development and Planning. No construction will begin within the floodplain prior to receiving authorization from the department. The Project will also cross other SFHAs of Hamilton Ditch, as well as SFHAs of Clover Groff Run and Hayden Run. However, the crossings will be aerial only and will not require impacting any SFHA. Impacts to water resources within the floodplain will be minimized through implementation of the project's SWPPP and associated erosion control best management practices. Maps showing the SFHAs are included in Appendix A of the Wetlands and Other Waters Delineation and Ecological Resources Report.

The Project crosses over 1 US interstate, 7 county roads, and 2 township roads. Aerial crossings and accessing the project from the road right of way will require submitting permit applications to Ohio Department of Transportation (ODOT) and Franklin County. All crossing and access permits will be secured prior to start of construction.

The letters sent to public officials within the jurisdiction of the Project is provided under Appendix B.

(e) Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

AEP Ohio Transco's consultant prepared a Threatened and Endangered Species Report and coordinated with the USFWS and Ohio Department of Natural Resources (ODNR) regarding special status species in the vicinity of the Project. Coordination with these agencies identified 26 species of state endangered, threatened, or potentially threatened wildlife within a one-mile radius of the Project. The species include one mammal, one bird, fifteen mollusks, eight fishes, and one plant. ODNR correspondences and comments from ES are included in Appendix C. Species identified by the ODNR are provided below in Table 4.

Table 4. State Listed Species Identified by ODNR

Common Name	Scientific Name	Status
Mammals		
Indiana bat	Myotis sodalis	E
Birds		
Upland sandpiper	Bartramia longicauda	Е
Mussels		
Purple cat's paw	Epioblasm o. obliquata	E
Clubshell	Pleurobema clava	Е
Northern riffleshell	Epioblasma torulosa rangiana	E
Rayed bean	Villosa fabalis	E
Rabbitsfoot	Quadrula cylindrical cylindrica	E
Snuffbox	Epioblasma triquetra	Т
Long solid	Fusconaia maculate maculate	E
Ohio pigtoe	Pleurobema cordatum	E
Pocketbook	Lampsilis ovata	E
Washboard	Megalonaias nervosa	E
Elephant-ear	Eliiptio crassidens crassidens	E
Black sandshell	Ligumia recta	Т
Threehorn wartyback	Obliquaria reflexa	Т
Pondhorn	Uniomerus tetralasmus	Т
Fawnsfoot	Truncilla donaciformis	Т
Fish	<u> </u>	

Scioto madtom	Notorus trautmani	E
Popeye shiner	Notropis ariommus	E
Northern brook lamprey	Icthyomyzon fossor	E
Spotted darter	Etheostoma maculatum	E
Shortnose gar	Lepisosteus platostomus	E
Tongue tied minnow	Exoglossum laurae	Т
Paddlefish	Polydon spathula	Т
Tippencanoe darter	Etheostoma Tippecanoe	Т
Plant		
Pale umbrella -sedge	Cyperus acuminatus	PT

E = Endangered, T = Threatened, PT = Potentially Threatened

The Project is within range of the Indiana bat, a state and federally listed endangered species. AEP Ohio Transco is committed to conserving all trees where feasible and clearing only when necessary those trees within existing and proposed ROWs, from the edges of the ROWs, and along proposed access routes between October 1 and March 31. If, during the summer months, an area is identified where additional clearing is needed then a net survey will be conducted between Junie 1 and August 15, prior to any clearing, or potential roost trees will be identified and left standing until the following winter. Therefore, the Project is not likely to negatively impact the Indiana Bat.

The Project is within the range of the upland sandpiper, a state-listed endangered bird that nests in native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program. The agency indicated that if this type of habitat is to be impacted by the Project, construction should be avoided in this habitat during the April 15 to July 31 nesting season for this species, and if this type of habitat will not be impacted, then the Project is not likely to impact this species. As indicated in the Wetlands and Other Waters Delineation and Ecological Resources Report, provided in Appendix C, suitable nesting habitat for the upland sandpiper was not identified within the Project area.

The Project is within the range of 15 species of mussel. Due to the location and that no in-water work is being proposed the ODNR has indicated the Project is not likely to impact any of these species.

The Project is within the range of eight species of fish. ODNR recommends no in-water work in perennial streams from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed, this Project is not likely to impact these or other

aquatic species. No in-water work will occur during construction of the Project; therefore, the Project will not impact these species.

#### Federal Listed Species

In the coordination between AEP Ohio Transco and United States Fish and Wildlife Services (USFWS), eight species were identified as federally endangered or threatened wildlife were found within the vicinity of the Project. Species identified by the agency include two mammals, five mussels, and one fish. Species identified by the USFWS are provided below in Table 5.

Table 5. Federal Listed Species Identified by USFWS

Common Name	Scientific Name	Status
Mammals		
Indiana bat	Myotis sodalis	E
Northern long-eared bat	Myotis septentrionalis	Ţ
Mussels		
Clubshell	Pleurobema clava	E
Northern riffleshell	Epioblasma torulosa rangiana	E
Rabbitsfoot	Quadrula c. cylindrica	Е
Rayed bean	Villosa fabalis	E
Snuffbox	Epioblasma triquetra	Е
Fish	·	
Scioto madtom	Notorus trautmani	E

E = Endangered, T = Threatened

The Project lies within the range of the Indiana bat and the Northern long eared bat and is in the vicinity of one or more confirmed records of Indiana bats. The USFWS assumes the presence of both mammals wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. As previously discussed, AEP Ohio Transco is committed to saving all trees  $\geq 3$  inches diameter at breast height (dbh) where feasible and clearing only when necessary those trees  $\geq 3$  inches dbh from existing and proposed right-of-ways, from the edges of the right of ways, and along proposed access routes between October 1 and March 31. If, during the summer months, an area is identified where additional clearing is needed then potential roost trees will be identified and left standing until the following winter. Therefore, the Project is not likely to negatively impact the Indiana bat or the Northern long eared bat.

The Project is within the range of 5 species of mussel. Because no in-water work is required the agency has indicated this will avoid direct impact to these species. The agency recommends the use of best construction techniques to reduce indirect impacts to these species. A SWPPP with

soil erosion control measures for construction and restoration will be prepared prior to construction. Sensitive areas will be demarcated on the SWPPP maps and control measures such as barrier fencing, silt fence, and signage will be installed to maintain buffers between construction areas and nearby rivers and streams. Additionally, all spoils will be contained to avoid contamination of waterways.

The Project is within the range of the bald eagle (*Haliaeetus leucocephalus*). Bald eagles are typically found near sizeable bodies of water, where water and ample food (fish) can be found within two miles of the nest (<a href="http://wildlife.ohiodnr.gov/species-and-habitats/species-guide-index/birds/bald-eagle">http://wildlife.ohiodnr.gov/species-and-habitats/species-guide-index/birds/bald-eagle</a>). No eagle nests were observed within the Project corridor or along proposed access routes during the field assessment. Due to the location of eagle nests in the area the USFWS has indicated that no significant project impacts are expected for this species.

No state or federally listed species were observed within the Project corridor, within any of the proposed access routes, or at any of the proposed landing zones and work areas during the field assessment. Because of their preferred habitats, timing, location, and types of activities being proposed, it is anticipated that the Project will not negatively impact any of the state or federally listed species identified by the ODNR and USFWS. USFWS and ODNR correspondences related to threatened or endangered species are included in the Wetlands and Other Waters Delineation and Ecological Resources Report provided in Appendix C.

(10) Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

AEP Ohio Transco's consultant prepared an Areas of Ecological Concern, Wetland Delineation, and Stream Assessment Report. No impacts to wetlands or streams are anticipated. The full Areas of Ecological Concern, Wetland Delineation, and Stream Assessment Report for the Project is included as Appendix C.

# B (10)(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of AEP's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts. Construction and operation of the Project is expected to meet all applicable safety standards established by the Occupational Safety and Health Administration and to be in accordance with the requirements specified in the latest revision of the National Electric Safety Code as adopted by the Public Utilities Commission of Ohio. The SWPPP, depicting the project's access plan, will be provided to the OPSB prior to construction.

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

11/1/2016 2:25:46 PM

in

Case No(s). 16-1690-EL-BLN

Summary: Letter of Notification (1) electronically filed by Mr. Hector Garcia on behalf of AEP Ohio Transmission Company