

Site: AEP - Hopper to Rhodes	Rater(s): KLV	Date: 7/19/2017
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2	2
max 6 pts.	subtotal

Metric 1. Wetland Area (size).

W010 - PEM-CATMOD2

Select one size class and assign score.

- ☐ >50 acres (>20.2ha) (6 pts)
- ☐ 25 to <50 acres (10.1 to <20.2ha) (5 pts)
- ☐ 10 to <25 acres (4 to <10.1ha) (4 pts)
- ☐ 3 to <10 acres (1.2 to <4ha) (3 pts)
- ☒ 0.3 to <3 acres (0.12 to <1.2ha) (2pts)
- ☐ 0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
- ☐ <0.1 acres (0.04ha) (0 pts)

5	7
max 14 pts.	subtotal

Metric 2. Upland buffers and surrounding land use.

2a. Calculate average buffer width. Select only one and assign score. Do not double check.

- ☐ WIDE. Buffers average 50m (164ft) or more around wetland perimeter (7)
- ☐ MEDIUM. Buffers average 25m to <50m (82 to <164ft) around wetland perimeter (4)
- ☒ NARROW. Buffers average 10m to <25m (32ft to <82ft) around wetland perimeter (1)
- ☐ VERY NARROW. Buffers average <10m (<32ft) around wetland perimeter (0)

2b. Intensity of surrounding land use. Select one or double check and average.

- ☐ VERY LOW. 2nd growth or older forest, prairie, savannah, wildlife area, etc. (7)
- ☒ LOW. Old field (>10 years), shrub land, young second growth forest. (5)
- ☒ MODERATELY HIGH. Residential, fenced pasture, park, conservation tillage, new fallow field. (3)
- ☐ HIGH. Urban, industrial, open pasture, row cropping, mining, construction. (1)

21	28
max 30 pts.	subtotal

Metric 3. Hydrology.

3a. Sources of Water. Score all that apply.

- ☐ High pH groundwater (5)
- ☐ Other groundwater (3)
- ☒ Precipitation (1)
- ☒ Seasonal/Intermittent surface water (3)
- ☐ Perennial surface water (lake or stream) (5)

3c. Maximum water depth. Select only one and assign score.

- ☐ >0.7 (27.6in) (3)
- ☐ 0.4 to 0.7m (15.7 to 27.6in) (2)
- ☒ <0.4m (<15.7in) (1)

3e. Modifications to natural hydrologic regime. Score one or double check and average.

- ☒ None or none apparent (12)
- ☐ Recovered (7)
- ☐ Recovering (3)
- ☐ Recent or no recovery (1)

3b. Connectivity. Score all that apply.

- ☐ 100 year floodplain (1)
- ☒ Between stream/lake and other human use (1)
- ☐ Part of wetland/upland (e.g. forest), complex (1)
- ☒ Part of riparian or upland corridor (1)

3d. Duration inundation/saturation. Score one or dbl check.

- ☐ Semi- to permanently inundated/saturated (4)
- ☐ Regularly inundated/saturated (3)
- ☒ Seasonally inundated (2)
- ☐ Seasonally saturated in upper 30cm (12in) (1)

Check all disturbances observed

- | | |
|---|---|
| <input type="checkbox"/> ditch | <input type="checkbox"/> point source (nonstormwater) |
| <input type="checkbox"/> tile | <input type="checkbox"/> filling/grading |
| <input type="checkbox"/> dike | <input type="checkbox"/> road bed/RR track |
| <input type="checkbox"/> weir | <input type="checkbox"/> dredging |
| <input type="checkbox"/> stormwater input | <input type="checkbox"/> other |

10	38
max 20 pts.	subtotal

Metric 4. Habitat Alteration and Development.

4a. Substrate disturbance. Score one or double check and average.

- ☒ None or none apparent (4)
- ☐ Recovered (3)
- ☐ Recovering (2)
- ☐ Recent or no recovery (1)

4b. Habitat development. Select only one and assign score.

- ☐ Excellent (7)
- ☐ Very good (6)
- ☐ Good (5)
- ☐ Moderately good (4)
- ☒ Fair (3)
- ☐ Poor to fair (2)
- ☐ Poor (1)

4c. Habitat alteration. Score one or double check and average.

- ☐ None or none apparent (9)
- ☐ Recovered (6)
- ☒ Recovering (3)
- ☐ Recent or no recovery (1)

Check all disturbances observed

- | | |
|---|---|
| <input checked="" type="checkbox"/> mowing | <input checked="" type="checkbox"/> shrub/sapling removal |
| <input type="checkbox"/> grazing | <input type="checkbox"/> herbaceous/aquatic bed removal |
| <input type="checkbox"/> clearcutting | <input type="checkbox"/> sedimentation |
| <input type="checkbox"/> selective cutting | <input type="checkbox"/> dredging |
| <input type="checkbox"/> woody debris removal | <input type="checkbox"/> farming |
| <input type="checkbox"/> toxic pollutants | <input type="checkbox"/> nutrient enrichment |

38
subtotal this page

Site: AEP - Hopper to Rhodes	Rater(s): KLV	Date: 7/19/2017
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38

subtotal first page

W010 - PEM - CAT MOD2

0

38

max 10 pts.
subtotal

Metric 5. Special Wetlands.

Check all that apply and score as indicated.

- ☐ Bog (10)
- ☐ Fen (10)
- ☐ Old growth forest (10)
- ☐ Mature forested wetland (5)
- ☐ Lake Erie coastal/tributary wetland-unrestricted hydrology (10)
- ☐ Lake Erie coastal/tributary wetland-restricted hydrology (5)
- ☐ Lake Plain Sand Prairies (Oak Openings) (10)
- ☐ Relict Wet Prairies (10)
- ☐ Known occurrence state/federal threatened or endangered species (10)
- ☐ Significant migratory songbird/water fowl habitat or usage (10)
- ☐ Category 1 Wetland. See Question 1 Qualitative Rating (-10)

3

41

max 20 pts
subtotal

Metric 6. Plant communities, interspersions, microtopography.

6a. Wetland Vegetation Communities.

Score all present using 0 to 3 scale.

- ☐ Aquatic bed
- ☐ Emergent
- ☐ Shrub
- ☐ Forest
- ☐ Mudflats
- ☐ Open water
- ☐ Other

6b. horizontal (plan view) Interspersion.

Select only one.

- ☐ High (5)
- ☐ Moderately high (4)
- ☐ Moderate (3)
- ☒ Moderately low (2)
- ☐ Low (1)
- ☐ None (0)

6c. Coverage of invasive plants. Refer to Table 1 ORAM long form for list. Add or deduct points for coverage

- ☐ Extensive >75% cover (-5)
- ☐ Moderate 25-75% cover (-3)
- ☒ Sparse 5-25% cover (-1)
- ☐ Nearly absent <5% cover (0)
- ☐ Absent (1)

6d. Microtopography.

Score all present using 0 to 3 scale.

- ☐ Vegetated hummocks/tussocks
- ☐ Coarse woody debris >15cm (6in)
- ☐ Standing dead >25cm (10in) dbh
- ☐ Amphibian breeding pools

Vegetation Community Cover Scale

0	Absent or comprises <0.1ha (0.2471 acres) contiguous area
1	Present and either comprises small part of wetland's vegetation and is of moderate quality, or comprises a significant part but is of low quality
2	Present and either comprises significant part of wetland's vegetation and is of moderate quality or comprises a small part and is of high quality
3	Present and comprises significant part, or more, of wetland's vegetation and is of high quality

Narrative Description of Vegetation Quality

low	Low spp diversity and/or predominance of nonnative or disturbance tolerant native species
mod	Native spp are dominant component of the vegetation, although nonnative and/or disturbance tolerant native spp can also be present, and species diversity moderate to moderately high, but generally w/o presence of rare threatened or endangered spp
high	A predominance of native species, with nonnative spp and/or disturbance tolerant native spp absent or virtually absent, and high spp diversity and often, but not always, the presence of rare, threatened, or endangered spp

Mudflat and Open Water Class Quality

0	Absent <0.1ha (0.247 acres)
1	Low 0.1 to <1ha (0.247 to 2.47 acres)
2	Moderate 1 to <4ha (2.47 to 9.88 acres)
3	High 4ha (9.88 acres) or more

Microtopography Cover Scale

0	Absent
1	Present very small amounts or if more common of marginal quality
2	Present in moderate amounts, but not of highest quality or in small amounts of highest quality
3	Present in moderate or greater amounts and of highest quality

4

End of Quantitative Rating. Complete Categorization Worksheets.

Site: AEP - Heppner-Rhodes

Rater(s): KLV

Date: 5/30/2017

W011-PEM-CAT1

0	0
max 6 pts.	subtotal

Metric 1. Wetland Area (size).

Select one size class and assign score.

- ☐ >50 acres (>20.2ha) (6 pts)
- ☐ 25 to <50 acres (10.1 to <20.2ha) (5 pts)
- ☐ 10 to <25 acres (4 to <10.1ha) (4 pts)
- ☐ 3 to <10 acres (1.2 to <4ha) (3 pts)
- ☐ 0.3 to <3 acres (0.12 to <1.2ha) (2pts)
- ☐ 0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
- ☒ <0.1 acres (0.04ha) (0 pts)

2	2
max 14 pts.	subtotal

Metric 2. Upland buffers and surrounding land use.

2a. Calculate average buffer width. Select only one and assign score. Do not double check.

- ☐ WIDE. Buffers average 50m (164ft) or more around wetland perimeter (7)
- ☐ MEDIUM. Buffers average 25m to <50m (82 to <164ft) around wetland perimeter (4)
- ☐ NARROW. Buffers average 10m to <25m (32ft to <82ft) around wetland perimeter (1)
- ☒ VERY NARROW. Buffers average <10m (<32ft) around wetland perimeter (0)

2b. Intensity of surrounding land use. Select one or double check and average.

- ☐ VERY LOW. 2nd growth or older forest, prairie, savannah, wildlife area, etc. (7)
- ☐ LOW. Old field (>10 years), shrub land, young second growth forest. (5)
- ☒ MODERATELY HIGH. Residential, fenced pasture, park, conservation tillage, new fallow field. (3)
- ☒ HIGH. Urban, industrial, open pasture, row cropping, mining, construction. (1)

9	11
max 30 pts.	subtotal

Metric 3. Hydrology.

3a. Sources of Water. Score all that apply

- ☐ High pH groundwater (5)
- ☐ Other groundwater (3)
- ☒ Precipitation (1)
- ☐ Seasonal/Intermittent surface water (3)
- ☐ Perennial surface water (lake or stream) (5)

3c. Maximum water depth. Select only one and assign score.

- ☐ >0.7 (27.6in) (3)
- ☐ 0.4 to 0.7m (15.7 to 27.6in) (2)
- ☒ <0.4m (<15.7in) (1)

3e. Modifications to natural hydrologic regime. Score one or double check and average.

- ☐ None or none apparent (12)
- ☒ Recovered (7) 5
- ☒ Recovering (3)
- ☐ Recent or no recovery (1)

3b. Connectivity. Score all that apply.

- ☐ 100 year floodplain (1)
- ☐ Between stream/lake and other human use (1)
- ☐ Part of wetland/upland (e.g. forest), complex (1)
- ☐ Part of riparian or upland corridor (1)

3d. Duration inundation/saturation. Score one or dbl check.

- ☐ Semi- to permanently inundated/saturated (4)
- ☐ Regularly inundated/saturated (3)
- ☒ Seasonally inundated (2)
- ☐ Seasonally saturated in upper 30cm (12in) (1)

Check all disturbances observed

- ☒ ditch
- ☐ tile
- ☐ dike
- ☐ weir
- ☐ stormwater input

- ☐ point source (nonstormwater)
- ☒ filling/grading
- ☐ road bed/RR track
- ☒ dredging
- ☐ other

5	16
max 20 pts.	subtotal

Metric 4. Habitat Alteration and Development.

4a. Substrate disturbance. Score one or double check and average.

- ☐ None or none apparent (4)
- ☒ Recovered (3)
- ☐ Recovering (2)
- ☐ Recent or no recovery (1)

4b. Habitat development. Select only one and assign score.

- ☐ Excellent (7)
- ☐ Very good (6)
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- ☐ Poor to fair (2)
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4c. Habitat alteration. Score one or double check and average.

- ☐ None or none apparent (9)
- ☐ Recovered (6)
- ☐ Recovering (3)
- ☒ Recent or no recovery (1)

Check all disturbances observed

- ☒ mowing
- ☐ grazing
- ☐ clearcutting
- ☐ selective cutting
- ☐ woody debris removal
- ☐ toxic pollutants

- ☐ shrub/sapling removal
- ☐ herbaceous/aquatic bed removal
- ☐ sedimentation
- ☐ dredging
- ☐ farming
- ☐ nutrient enrichment

16
subtotal this page

Site: AEP - Heppner-Rhodes

Rater(s): KLV

Date: 5/30/2017

16

subtotal first page

W011-PEM-CAT1

0 16

max 10 pts

subtotal

Metric 5. Special Wetlands.

Check all that apply and score as indicated.

- ☐ Bog (10)
- ☐ Fen (10)
- ☐ Old growth forest (10)
- ☐ Mature forested wetland (5)
- ☐ Lake Erie coastal/tributary wetland-unrestricted hydrology (10)
- ☐ Lake Erie coastal/tributary wetland-restricted hydrology (5)
- ☐ Lake Plain Sand Prairies (Oak Openings) (10)
- ☐ Relict Wet Prairies (10)
- ☐ Known occurrence state/federal threatened or endangered species (10)
- ☐ Significant migratory songbird/water fowl habitat or usage (10)
- ☐ Category 1 Wetland. See Question 1 Qualitative Rating (-10)

2 18

max 20 pts

subtotal

Metric 6. Plant communities, interspersions, microtopography.

6a. Wetland Vegetation Communities.

Score all present using 0 to 3 scale.

- ☐ 0 Aquatic bed
- ☐ 1 Emergent
- ☐ 0 Shrub
- ☐ 0 Forest
- ☐ 0 Mudflats
- ☐ 0 Open water
- ☐ 0 Other

6b. horizontal (plan view) Interspersions.

Select only one.

- ☐ High (5)
- ☐ Moderately high(4)
- ☐ Moderate (3)
- ☐ Moderately low (2)
- ☐ Low (1)
- ☒ None (0)

6c. Coverage of invasive plants. Refer to Table 1 ORAM long form for list. Add or deduct points for coverage

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- ☐ Sparse 5-25% cover (-1)
- ☐ Nearly absent <5% cover (0)
- ☒ Absent (1)

6d. Microtopography

Score all present using 0 to 3 scale.

- ☐ 0 Vegetated hummocks/tussucks
- ☐ 0 Coarse woody debris >15cm (6in)
- ☐ 0 Standing dead >25cm (10in) dbh
- ☐ 0 Amphibian breeding pools

Vegetation Community Cover Scale

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Mudflat and Open Water Class Quality

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Microtopography Cover Scale

0	Absent
1	Present very small amounts or if more common of marginal quality
2	Present in moderate amounts, but not of highest quality or in small amounts of highest quality
3	Present in moderate or greater amounts and of highest quality

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End of Quantitative Rating. Complete Categorization Worksheets.

APPENDIX E

ODNR and USFWS Correspondence



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldrige, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

October 20, 2017

Allison Wheaton
GAI Consultants
3720 Dressler Road NW
Canton, Ohio 44718

Re: 17-638; AEP, Rhodes - Heppner 138kV Line Rebuild Project

Project: The proposed project involves the rebuilding of approximately 4.6 miles of the Rhodes - Heppner 138kV transmission line.

Location: The proposed project is in Coal and Lick Townships, Jackson County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following records at or within a one-mile radius of the project area:

Cerulean warbler (*Dendroica cerulea*), State and federal species of concern
Coalton Wildlife Area – ODNR Division of Wildlife

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

The review was performed on the project area specified in the request as well as an additional one mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided

and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of little spectaclecase (*Villosa lienosa*), a state endangered mussel. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact this species.

The project is within the range of the Ohio lamprey (*Ichthyomyzon bdellium*), a state endangered fish, and the lake chubsucker (*Erimyzon sucetta*) a state threatened fish. The DOW recommends no in-water work in perennial streams from April 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the timber rattlesnake (*Crotalus horridus horridus*), a state endangered species, and a federal species of concern. The timber rattlesnake is a woodland species. In addition to using wooded areas, the timber rattlesnake also utilizes sunlit gaps in the canopy for basking and deep rock crevices known as den sites for overwintering. Due to the location, the type of habitat along the project route, this project is not likely to impact this species.

The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet meadows and other wetlands. Due to the location, the type of habitat along the project route and within the vicinity of the project route, this project is not likely to impact this species.

The project is within the range of the mud salamander (*Pseudotriton montanus*), a state threatened species. Due to the location, the type of habitat present at the project site, this project is not likely to impact this species.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
John.Kessler@dnr.state.oh.us



Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

May 12, 2017
Project C170352.06

Environmental Review Staff
Ohio Department of Natural Resources
Division of Wildlife - Ohio Natural Heritage Program
2045 Morse Road, Building G-3
Columbus, Ohio 43229-6693

**American Electric Power
Rhodes – Heppner 138kV Line Rebuild Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Jackson County, Ohio**

Dear Staff:

GAI Consultants, Inc. (GAI), on behalf of American Electric Power (AEP), is requesting information regarding state- and federally-listed threatened and endangered species in the vicinity of the Rhodes – Heppner 138kV Line Rebuild Project (Project) in Jackson County, Ohio. As part of this request, please provide information specific to any threatened and endangered bats. GAI is also requesting the locations of any known golden or bald eagle nests in the area.

The proposed Project involves the rebuild of approximately 4.6 miles of the Rhodes – Heppner 138kV transmission line.

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists of maintained right-of-way bordered by mixed deciduous forests, agricultural lands, and residential properties. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 330.324.9148 or via email at a.wheaton@gaiconsultants.com if you have any questions or require further information.

Sincerely,
GAI Consultants, Inc.

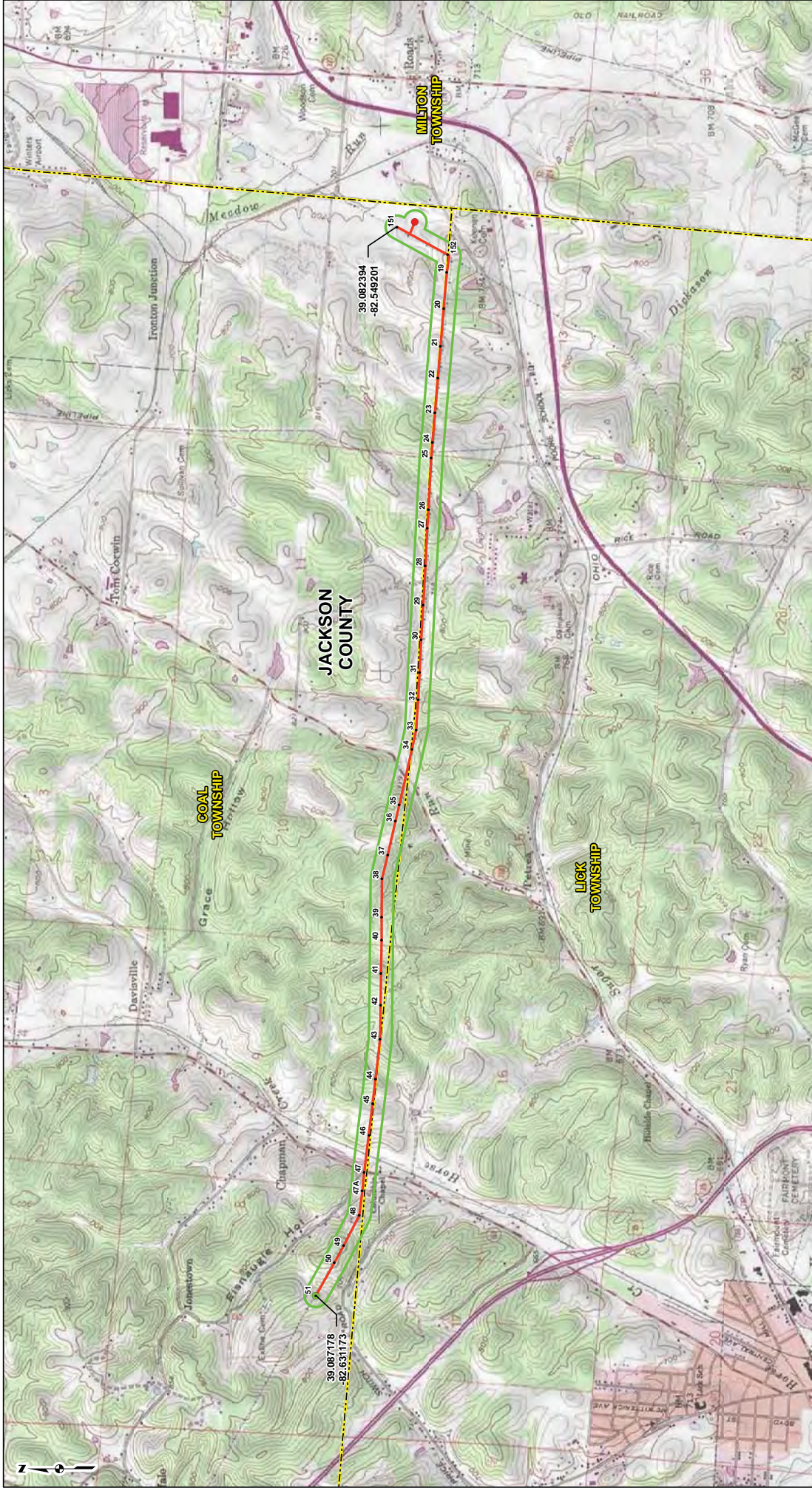
A handwritten signature in blue ink, appearing to read 'Allison R. Wheaton'.

Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

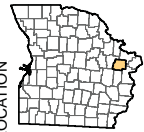
ARW/kea

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



PROJECT LOCATION



REFERENCE: USGS 7.5 TOPOGRAPHIC QUADRANGLES: JACKSON (1978) AND WELLSTON (1977), OHIO. OBTAINED THROUGH ESRI USA TOPO MAPS NATIONAL GEOGRAPHIC TOPO AND USGS. ACCESSED 03/2017.

LEGEND

- EXISTING STRUCTURE
- (PROPOSED) HEPPNER SWITCH STATION
- (PROPOSED) RHODES SWITCH STATION
- EXISTING TRANSMISSION LINE
- STUDY AREA
- COUNTY BOUNDARY
- TOWNSHIP BOUNDARY

0 1,000 2,000 4,000 Feet

PROJECT LOCATION MAP



RHODES - HEPPNER
138kV LINE REBUILD PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: AKW
CHECKED: EFJ
DATE: 5/12/2017
APPROVED:

JACKSON COUNTY, OHIO

From: susan_zimmermann@fws.gov on behalf of [Ohio, FW3](#)
To: [Allison Wheaton](#)
Cc: kate.parsons@dnr.state.oh.us; nathan.reardon@dnr.state.oh.us
Subject: Four (4) AEP Projects: Heppner / Rhoads / Ginger / Rhoads-Heppener
Date: Friday, June 02, 2017 1:39:00 PM
Attachments: [Capture of Dan.PNG](#)



UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994



03E15000-2017-TA-1329 GAI AEP Ginger Switch Replacement Project, Ross Co.
03E15000-2017-TA-1328 GAI AEP Heppner Substation Project, Jackson Co.
03E15000-2017-TA-1327 GAI AEP Rhodes Substation Project, Jackson Co.
03E15000-2017-TA-1326 GAI AEP Rhoads-Heppner 138kV Line Rebuild, Jackson

Dear Ms. Wheaton,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags =3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as

well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Everson".

Dan Everson

Field Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW



Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

May 12, 2017
Project C170352.06

Mr. Dan Everson
United States Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

**American Electric Power
Rhodes – Heppner 138kV Line Rebuild Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Jackson County, Ohio**

Dear Mr. Everson:

GAI Consultants, Inc. (GAI), on behalf of American Electric Power (AEP), is requesting information regarding state- and federally-listed threatened and endangered species in the vicinity of the Rhodes – Heppner 138kV Line Rebuild Project (Project) in Jackson County, Ohio. As part of this request, please provide information specific to any threatened and endangered bats. GAI is also requesting the locations of any known golden or bald eagle nests in the area.

The proposed Project involves the rebuild of approximately 4.6 miles of the Rhodes – Heppner 138kV transmission line.

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists of maintained right-of-way bordered by mixed deciduous forests, agricultural lands, and residential properties. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 330.324.9148 or via email at a.wheaton@gaiconsultants.com if you have any questions or require further information.

Sincerely,
GAI Consultants, Inc.

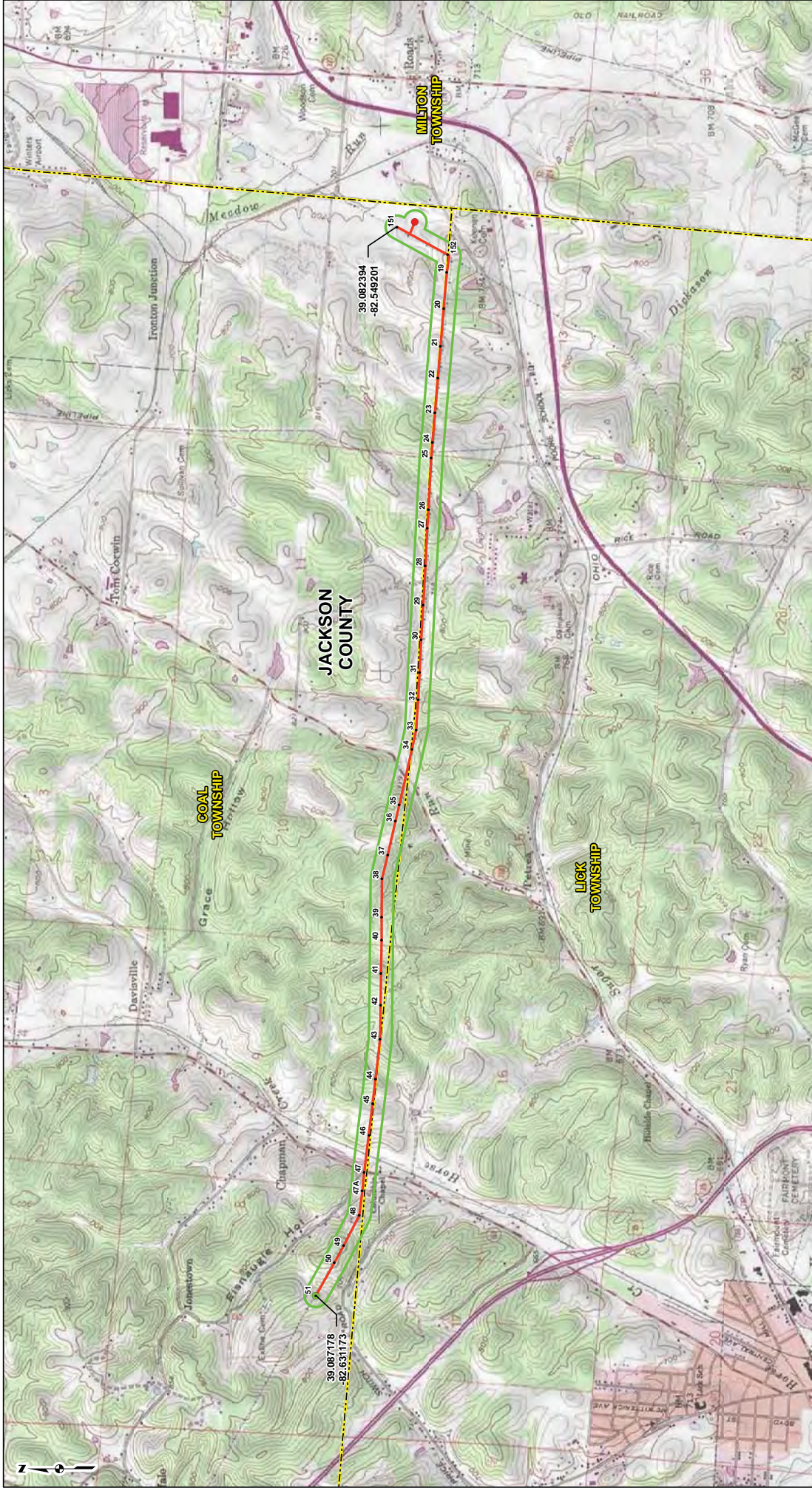
A handwritten signature in blue ink, appearing to read 'Allison R. Wheaton'.

Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

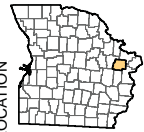
ARW/kea

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



PROJECT LOCATION



REFERENCE: USGS 7.5 TOPOGRAPHIC QUADRANGLES: JACKSON (1978) AND WELLSTON (1977), OHIO. OBTAINED THROUGH ESRI USA TOPO MAPS NATIONAL GEOGRAPHIC TOPO AND USGS. ACCESSED 03/2017.

LEGEND

- EXISTING STRUCTURE
- (PROPOSED) HEPPNER SWITCH STATION
- (PROPOSED) RHODES SWITCH STATION
- EXISTING TRANSMISSION LINE
- STUDY AREA
- COUNTY BOUNDARY
- TOWNSHIP BOUNDARY

0 1,000 2,000 4,000 Feet

PROJECT LOCATION MAP



RHODES - HEPPNER
138kV LINE REBUILD PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: AKW
CHECKED: EFJ
DATE: 5/12/2017
APPROVED:

JACKSON COUNTY, OHIO

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/14/2017 3:02:06 PM

in

Case No(s). 17-0807-EL-BLN

Summary: Letter of Notification electronically filed by Ms. Christen M. Blend on behalf of AEP Ohio Transmission Power Company, Inc.