



Legal Department

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

August 28, 2018

**Hector Garcia**  
**Christen M. Blend**  
Senior Counsel –  
Regulatory Services  
(614) 716-3410 (P)  
(614) 716-1915 (P)  
[hgarcia1@aep.com](mailto:hgarcia1@aep.com)  
[cmblend@aep.com](mailto:cmblend@aep.com)

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

**Re: PUCO Case No. 18-1182-EL-BLN**  
**In the Matter of the Letter of Notification for the**  
**Gay-McComb 138kV Transmission Line Project**

Dear Chairman Haque,

Attached please find a copy of the Letter of Notification for the above-captioned project ("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, including an electronic copy.

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

Respectfully submitted,

/s/ Christen M. Blend

Christen M. Blend (0086881), Counsel of Record  
Hector Garcia (0084517)

Counsel for AEP Ohio Transmission Company, Inc.

cc: Jon Pawley, OPSB Staff

# Letter of Notification for Gay-McComb 138 kV Transmission Line Extension Project



PUCO Case No. 18-1182-EL-BLN

Submitted to:  
The Ohio Power Siting Board  
Pursuant to Ohio Administrative Code  
Section 4906-6-05

Submitted by:  
AEP Ohio Transmission Company, Inc.

August 28, 2018

## Letter of Notification

**AEP Ohio Transmission Company, Inc. (AEP Ohio Transco)**

**Gay-McComb 138 kV Transmission Line Extension Project**

**4906-6-05**

AEP Ohio Transmission Company, Inc. ("AEP Ohio Transco") provides the following information in accordance with the requirements of Ohio Administrative Code Section 4906-6-05.

### **4906-6-05(B) General Information**

#### **B(1) Project Description**

**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 for a Letter of Notification.**

AEP Ohio Transco is proposing the Gay-McComb 138 kV Transmission Line Extension Project ("Project"), located within Columbus, Franklin Township, Franklin County, Ohio. The Project includes the construction of four new steel pole structures on Ohio Power Company property. The eastern and western extensions are approximately 0.13 and 0.14 miles in length, respectively. The proposed transmission line extensions will extend from the existing Gay-McComb 138 kV transmission line to energize a new distribution substation owned by Ohio Power Company. The right-of-way ("ROW") is located on Parcel No. 140-000063-00 ("Property"), owned by Ohio Power Company. Figure 1.1 in Appendix A shows the location of the Project. Figure 1.2 in Appendix A shows the Project Area for the transmission line extension.

The Project meets the requirements for a Letter of Notification ("LON") because it is within the types of projects defined by Item 1(b) of Appendix A to O.A.C. 4906-1-01, *Application Requirement Matrix For Electric Power Transmission Lines*:

*(1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*

*(b) Line(s) greater than 0.2 miles in length but not greater than 2 miles in length.*

The Project has been assigned PUCO Case No. 18-1182-EL-BNR.

## **B(2) Statement of Need**

**If the proposed project is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.**

Ohio Power Company has requested a new 138 kV delivery point to serve a new distribution station located between Gay Station and McComb station at a site owned by the Ohio Power Company. This station will replace an existing 40/13 kV distribution station which is served by the antiquated 40 kV system currently sourced from other stations. This new delivery point will allow AEP Ohio Transco to develop plans for elimination of this particular pocket of obsolete 40 kV subtransmission, will provide Ohio Power Company adequate distribution capacity with the ability to increase capacity as needed, and will allow area rehabilitation plans, including distribution station configuration improvements, to proceed that will not need to accommodate continuance of 40 kV facilities.

The PJM identifier for the Project is S1606. The Project is included in Ohio Power Company's Long Term Forecast Report (FE-T9 pg. 3,7 and FE-T10 pg. 1) and is attached as Appendix D.

## **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.**

Figures 1.1, 1.2, and 1.4 in Appendix A show the location of the proposed Project in relation to the existing transmission line and new distribution station.

## **B(4) Alternatives Considered**

**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 constructed entirely on Ohio Power Company-owned property and no wetlands, streams, or other ecologically sensitive areas will be impacted by Project-related construction activities. No other reasonable alternatives were identified since the most logical alignments for the short extensions fall completely within the boundaries of Ohio Power Company's property. Socioeconomic, land use, and ecological information is presented in Section B(10). Project area maps showing land use features in the Project area are included in Appendix A. Engineering aspects of the Project are included in Section B(9).



**B(5) Public Information Program**

**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 Transco 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. Section 4906-6-08(B). AEP Ohio Transco also maintains a 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 proposed Project. Lastly, AEP Ohio Transco retains ROW land agents who discuss project timelines, construction and restoration activities with affected owners and tenants.

**B(6) Construction Schedule**

**The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.**

Construction of the Project is planned to begin in first quarter 2019, and the anticipated in-service date will be approximately June 2019.

**B(7) Area Map**

**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 1.1 in Appendix A provides a topographical map of existing and proposed facilities at 1:24,000 scale, and Figure 1.2 provides an aerial image showing roads and highways, clearly marked with Project components, at a scale of 1:1,800 scale.

To visit the Project from Columbus, Ohio, take I-70 West. Take exit 98B and turn right onto Mound Street. Turn left onto US-62 West/Harrisburg Pike, continue approximately 0.6 miles. The Project area will be on the right in the City of Columbus.

## **B(8) Property Agreements**

**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.**

All construction will occur on Ohio Power Company property and ROW. No other property easements, options, or land use agreements are necessary to construct the Project or operate the transmission lines.

## **B(9) Technical Features**

**The applicant shall describe the following information regarding the technical features of the Project:**

### **B(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.**

The transmission line construction will include the following:

Voltage: 138kV

Conductors: 636,000 CM ACSR 26/7 (Grosbeak)

Static Wire: 7# 8 Alumoweld

Insulators: Polymer

ROW Width: 50 Feet

Structure Types: There will be 2 single circuit monopole custom dead end structures and 2 single circuit monopole tangent structures.

The Project will involve the construction of four (4) new steel pole structures. Two of these structures are custom dead end structures and the other two are standard tangent structures. The structures range from 80 to 85 feet in height. The Project will utilize 636,000 CM ACSR 26/7 (Grosbeak) conductors and 7# 8 Alumoweld shield wires. All deadends will utilize pier foundations with anchor cages, and the tangent structures will utilize direct embed foundations.

### **B(9)(b) Electric and Magnetic Fields**

**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. The discussion shall include:**

No occupied residences or institutions are located within 100 feet of the Project.

## **B(9)(b)(i) Calculated Electric and Magnetic Field Strength Levels**

### **i) Calculated Electric and Magnetic Field Levels**

No occupied residences or institutions are located within 100 feet of the Project.

## **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 right-of-way width.**

No occupied residences or institutions are located within 100 feet of the Project.

## **B(9)(c) Project Cost**

**The estimated capital cost of the project.**

The capital cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$1,312,064, using a Class 3 estimate.

## **B(10) Social and Economic Impacts**

**The applicant shall describe the social and ecological impacts of the project.**

### **B(10)(a) Land Use Characteristics**

**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 Columbus, Franklin Township, Franklin County, Ohio. Figure 1.3 in Appendix A shows the land use within the Project area which is an empty field (3.1 acres). No tree clearing is anticipated to be required for the Project. No streams or wetlands were identified within the Project area (Appendix B, Figure 2). The Project parcel is owned by Ohio Power Company. There are no residences located within 100 feet of the Project area. There are no parks, churches, cemeteries, wildlife management areas, or nature preserve lands within 1,000 feet of the centerline of the Project (Appendix A, Figure 1.3).

### **B(10)(b) Agricultural Land Information**

**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.**

The Project area is classified as vacant commercial land. The Franklin County Auditor indicates that no agricultural district lands or agricultural land will be affected by the Project (Appendix A, Figure 1.3). The Project includes the construction of four new steel pole structures and two parallel electric transmission line extensions within Ohio Power Company property, with a 0.14-mile and 0.13-mile line extension connecting to a proposed distribution station. The land use affected by this Project is an empty field (3.1 acres).

### **B(10)(c) Archaeological and Cultural Resources**

**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.**

A cultural report was completed and will be coordinated directly with the OPSB. See Appendix C for correspondence from Ohio Historic Preservation Office ("OHPO").

### **B(10)(d) Local, State, and Federal Agency Correspondence**

**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.**

A Notice of Intent ("NOI") will be filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHC000005, and 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.

Coordination with the OHPO, the United States Fish and Wildlife Service ("USFWS"), and the Ohio Department of Natural Resources ("ODNR") has been completed and coordination letters can be found in Appendix C.

The Project will not require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers (“USACE”) or Pre-Construction Notification to the USACE as no streams or wetlands will be impacted by the Project. No structures are located within a 100-year floodplain area. Therefore, no floodplain permitting is expected to be required for the Project.

There are no other known local, state or federal requirements that must be met prior to commencement of the Project.

### **B(10)(c) Threatened, Endangered, and Rare Species**

**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.**

The United States Fish and Wildlife Service (“USFWS”) *Federally Endangered, Threatened, Candidate Species, and Species of Concern in Ohio by County January 2018* (available at <https://www.fws.gov/midwest/endangered/lists/pdf/OhioCtyList29Jan2018.pdf>) was reviewed to determine the threatened and endangered species currently known to occur in Franklin County. This USFWS publication lists the following:

| <b>Common Name</b>      | <b>Scientific Name</b>                | <b>Listing Status</b>       |
|-------------------------|---------------------------------------|-----------------------------|
| Indiana Bat             | <i>Myotis sodalis</i>                 | Federally listed endangered |
| Northern Long-Eared Bat | <i>Myotis septentrionalis</i>         | Federally listed threatened |
| Scioto Madtom           | <i>Noturus trautmani</i>              | Federally endangered        |
| Clubshell               | <i>Pleurobema clava</i>               | Federally endangered        |
| Northern Riffleshell    | <i>Epioblasma torulosa</i>            | Federally endangered        |
| Rabbitsfoot             | <i>Quadrula cylindrica cylindrica</i> | Federally threatened        |
| Rayed Bean              | <i>Villosa fabalis</i>                | Federally endangered        |
| Snuffbox                | <i>Epioblasma triquetra</i>           | Federally endangered        |

Several state-listed threatened and endangered species, species of concern, and special interest species are listed by the Ohio Department of Natural Resources (“ODNR”) <http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/species%20and%20habitats/state-listed%20species/franklin.pdf>) as occurring or potentially occurring in Franklin County. The Indiana bat, northern long-eared bat, and other state-listed species occurring in Franklin County are addressed in detail in the Ecological Resources Inventory Report included in Appendix B.

As part of the ecological study completed for the Project, a coordination letter was submitted to the USFWS Ohio Ecological Services Field Office seeking technical assistance on the Project for potential impacts to threatened or endangered species. The November 21, 2017 response letter from USFWS ( Appendix C) indicated that the project is in the vicinity of one or more confirmed records of Indiana bats. Therefore the USFWS recommends that trees greater than or equal to three inches in diameter at breast height (dbh) be saved wherever possible. No caves or abandoned mines are present in the Project area, thus the USFWS recommends that removal of any trees three inches or greater dbh occur between October 1 and March 31. Following this seasonal tree clearing should ensure that any effects to Indiana and northern long eared bats are insignificant or discountable, per the USFWS. If seasonal tree clearing is not possible, summer surveys for Indiana bats and northern long eared bats may be conducted between June 1 and August 15. As noted above, no tree clearing is expected for this Project; therefore, AEP Ohio Transco does not anticipate any impacts to Indiana bats or northern long eared bats. Due to the Project type, size, and location, USFWS does not anticipate effects to any other federally endangered, threatened, proposed, or candidate species. Additionally, USFWS indicated that there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area (Appendix C). USFWS recommended that impacts to wetlands and other water resources be avoided or minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

As part of the ecological study completed for the Project, an environmental review coordination letter was submitted to the ODNR Office of Real Estate. The ODNR Office of Real Estate responded on January 26, 2018 (Appendix C) and indicated that ODNR Natural Heritage Database has one record of the state potentially listed pale umbrella sedge (*Cyperus acuminatus*) within a one-mile radius of the Project area. In the same letter, the ODNR-Division of Wildlife (DOW) recommended 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 DOW also noted the project is within the range of several threatened and endangered mussel and fish species (Appendix C), but due to the Project location and that there is no in-water work proposed, this Project is not likely to impact aquatic species.

The DOW also stated the project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird, however, due to the Project location, type of work proposed, and type of habitat present in the Project area, this Project is not likely to impact this species.

USFWS and ODNR correspondence relating to threatened and endangered species and an endangered and rare species review is included in the Ecological Resources Inventory Report provided in Appendix B.

#### **B(10)(f) Areas of Ecological Concern**

**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.**

The USFWS response letter indicated that there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area (Appendix C). The ODNR-Office of Real Estate response letter indicated no records of unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, national wildlife refuges, or other protected natural areas are within a one-mile radius of the Project area (Appendix C).

An ecological resources inventory and wetland and stream delineation was completed by AEP Ohio Transco's consultants within the Project area on March 14, 2018. No wetlands or streams were observed in the Project area, and no wetlands or streams are proposed to be impacted by the installation of the proposed Project. Photographs of the Project area are provided in the Ecological Resources Inventory Report located in Appendix B.

As noted above, a SWPPP has been completed for the Project.

#### **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 Ohio Transco's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

**LETTER OF NOTIFICATION FOR GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION  
PROJECT**

**Appendix A Project Maps**

Figures 1.1, 1.2, 1.3, and 1.4



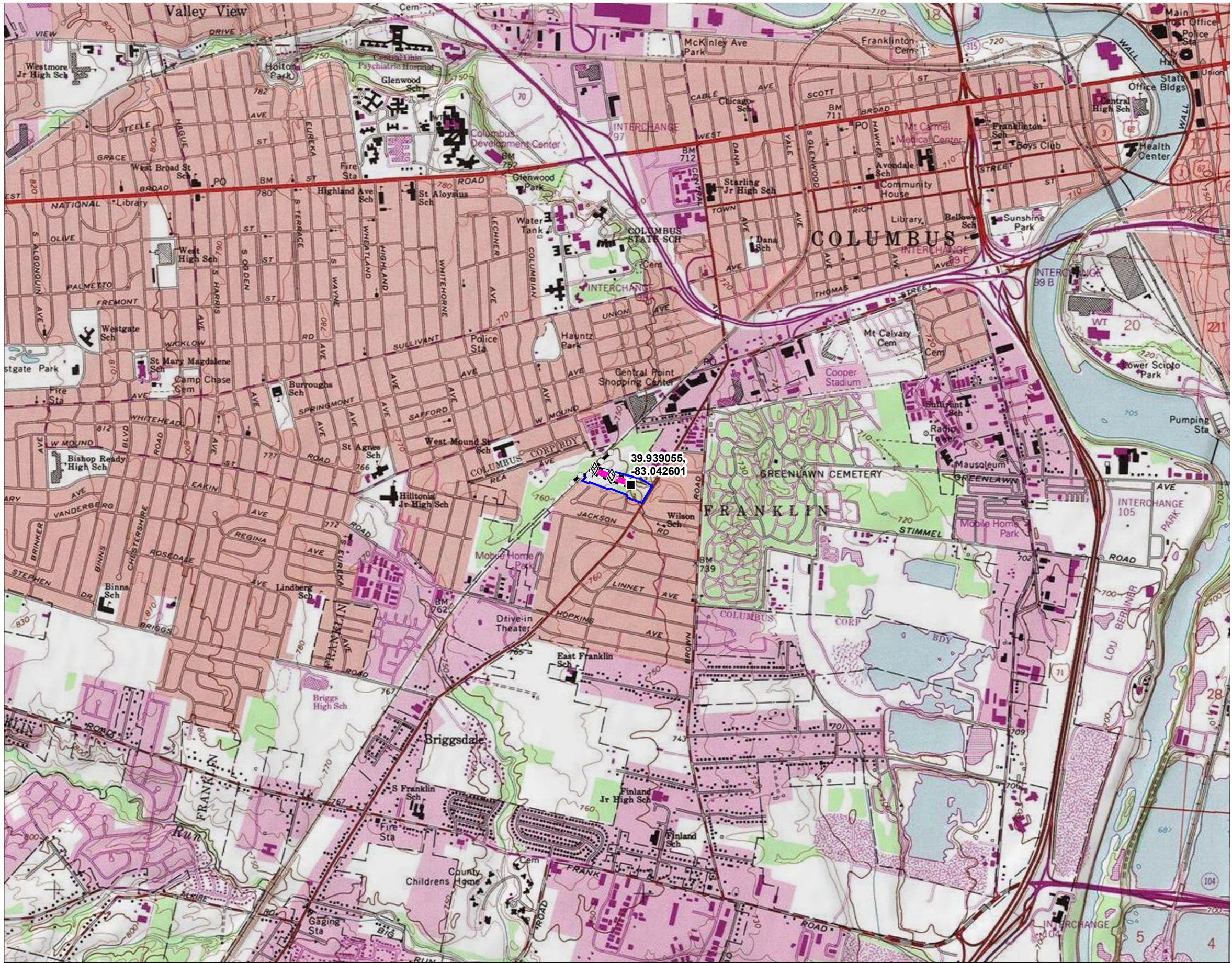
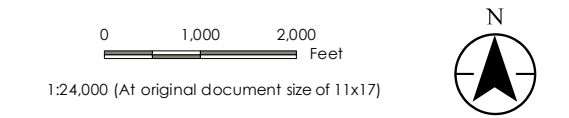
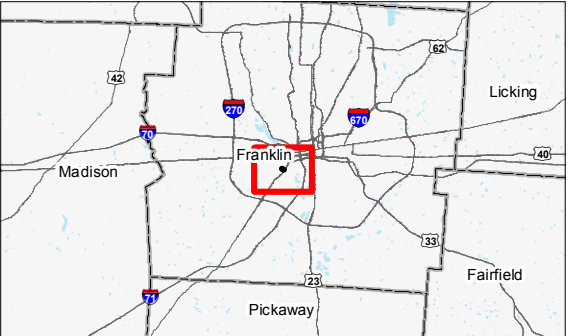


Figure No. 1.1  
Title Project Location Map  
Client/Project AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line Extension Project  
Project Location Franklin County, OH  
193705748  
Prepared by JLH on 2018-05-15  
Technical Review by KC on 2018-07-05  
Independent Review by JB on 2018-07-10



- Legend
- Proposed Distribution Station
  - Existing Structure
  - Proposed Structure
  - Gay-McComb 138 kV Transmission Line
  - Proposed 138 kV Transmission Line
  - Project Area (100' ROW)
  - AEP Ohio Transco Property



- Notes
- Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
  - Data Sources Include: Stantec, AEP, USGS, NADS
  - Background: USGS 7.5' Topographic Quadrangles: Southwest Columbus, OH (1983)



V:\1937\Activa\193705748\03\_data\ok\_csd\ok\mxd\193705748.mxd 2 on bvoid 193705748.mxd Resected 2018-07-10 By: JHeldman



Figure No.  
**1.2**

Title  
**Project Layout Map**

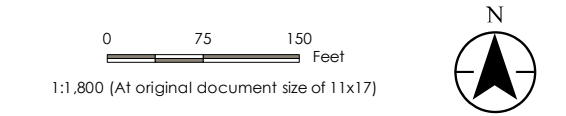
---

Client/Project  
AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line  
Extension Project

---

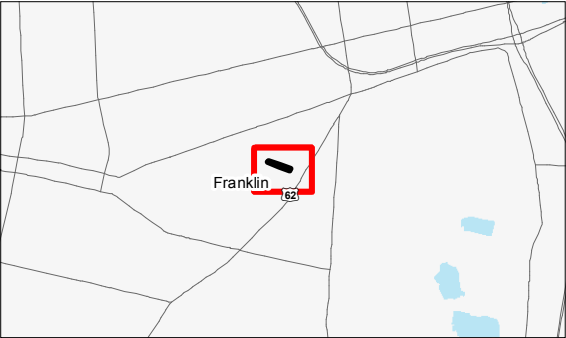
Project Location  
Franklin County, OH

193705748  
Prepared by JLH on 2018-05-15  
Technical Review by KC on 2018-07-05  
Independent Review by JB on 2018-07-10



Legend

- Proposed Distribution Station
- Existing Structure
- ◇ Proposed Structure
- Gay-McComb 138 kV Transmission Line
- - - Proposed 138 kV Transmission Line
- - - Project Area (100' ROW)
- ▭ AEP Ohio Transco Property



- Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
  2. Data Sources Include: Stantec, AEP, USGS, NADS, OGRIP
  3. Orthophotography: 2015 NAIP





V:\1937\Activa\193705748\03\_data\ok\_csd\ok\mxd\lan\_laurea\lpl\_3\_lan\_bnd\_lue\_193705748.mxd    Revised: 2018-07-10 By: JHedeman



Figure No. **1.3**

Title **Land Use Map**

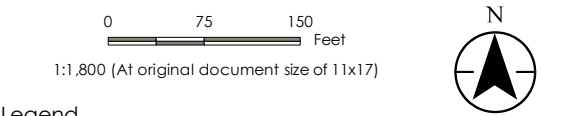
---

Client/Project  
AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line  
Extension Project

---

Project Location  
Franklin County, OH

193705748  
Prepared by JLH on 2018-05-15  
Technical Review by KC on 2018-07-05  
Independent Review by JB on 2018-07-10



**Legend**

- Proposed Distribution Station
- Existing Structure
- Proposed Structure
- Gay-McComb 138 kV Transmission Line
- Proposed 138 kV Transmission Line
- Project Area (100' ROW)
- AEP Ohio Transco Property
- Residence
- School\*
- Cemetery\*
- Church\*
- Habitat Area
- Old Field
- National Land Cover Database
  - Developed, High Intensity
  - Developed, Low Intensity
  - Developed, Medium Intensity
  - Developed, Open Space

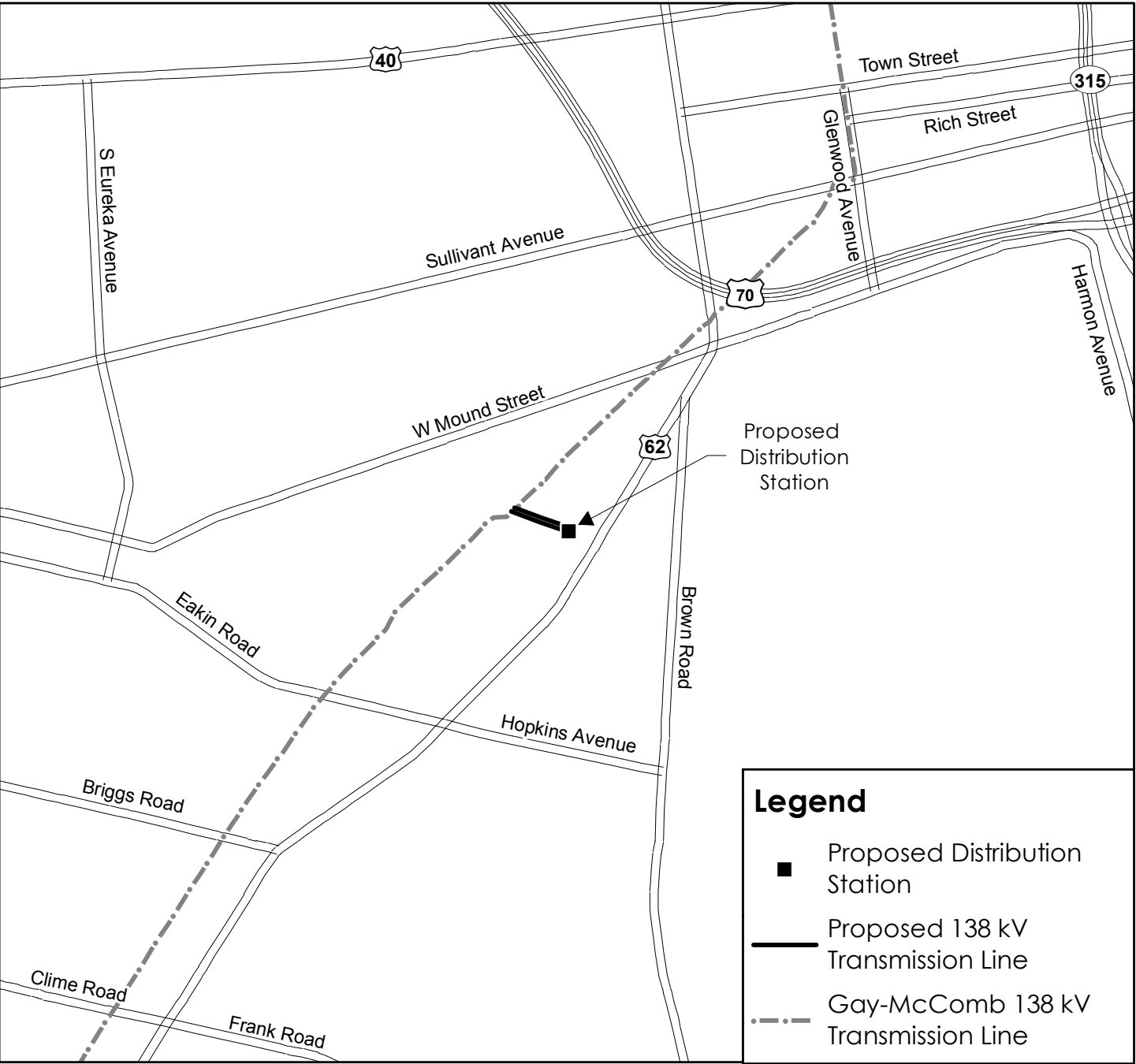
\*No features within map extents



- Notes**
- Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
  - Data Sources Include: Stantec, AEP, USGS, NLCD, NADS, OGRIP
  - Orthophotography: 2015 NAIP



Figure 1.4 - Concept Map



**LETTER OF NOTIFICATION FOR GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION  
PROJECT**

**Appendix B Ecological Resources Inventory Report**



**Gay-McComb 138 kV  
Transmission Line Extension  
Project, Franklin County, Ohio**

Ecological Resources Inventory Report

July 9, 2018

Prepared for:

AEP Ohio Transmission Company, Inc.  
700 Morrison Road  
Gahanna, Ohio 43230

Prepared by:

Stantec Consulting Services Inc.  
1500 Lake Shore Drive, Suite 100  
Columbus, Ohio 43204

## Sign-off Sheet

This document entitled Gay-McComb 138 kV Transmission Line Extension Project was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of AEP Ohio Transmission Company, Inc. (the "Client"). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by Michelle Kearns  
(signature)

**Michelle Kearns**  
Reviewed by Kim Carter  
(signature)

**Kim Carter**  
Approved by Matt Teitt  
(signature)

**Matt Teitt**

## Table of Contents

|            |                                                       |           |
|------------|-------------------------------------------------------|-----------|
| <b>1.0</b> | <b>INTRODUCTION .....</b>                             | <b>1</b>  |
| <b>2.0</b> | <b>METHODS .....</b>                                  | <b>1</b>  |
| 2.1        | WETLAND DELINEATION .....                             | 1         |
| 2.2        | STREAM DELINEATION.....                               | 1         |
| 2.3        | RARE SPECIES.....                                     | 2         |
| <b>3.0</b> | <b>RESULTS .....</b>                                  | <b>2</b>  |
| 3.1        | TERRESTRIAL HABITAT .....                             | 2         |
| 3.2        | WETLANDS .....                                        | 2         |
| 3.3        | STREAMS .....                                         | 2         |
| 3.4        | OPEN WATER .....                                      | 3         |
| 3.5        | RARE, THREATENED, OR ENDANGERED SPECIES HABITAT ..... | 4         |
| <b>4.0</b> | <b>CONCLUSIONS AND RECOMMENDATIONS .....</b>          | <b>11</b> |
| <b>5.0</b> | <b>REFERENCES.....</b>                                | <b>12</b> |

## LIST OF TABLES

|                                                                                                                                                           |   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| Table 1. Vegetation Communities and Land Cover Found within the Gay-McComb 138 kV Transmission Line Extension Project Area, Franklin County, Ohio.....    | 2 |
| Table 2. Summary of Potential Ohio State-Listed Species within the Gay-McComb 138 kV Transmission Line Extension Project Area, Franklin County, Ohio..... | 4 |
| Table 3. Summary of Potential Federally-Listed Species within the Gay-McComb 138 kV Transmission Line Extension Project Area, Franklin County, Ohio.....  | 9 |

## LIST OF APPENDICES

|                   |                                                        |            |
|-------------------|--------------------------------------------------------|------------|
| <b>APPENDIX A</b> | <b>FIGURES .....</b>                                   | <b>A.1</b> |
| A.1               | Figure 1 – Project Location Map .....                  | A.1        |
| A.2               | Figure 2 – Wetland and Waterbody Delineation Map ..... | A.2        |
| A.3               | Figure 3 – Habitat Assessment Map .....                | A.3        |
| <b>APPENDIX B</b> | <b>AGENCY CORRESPONDENCE .....</b>                     | <b>B.1</b> |
| <b>APPENDIX C</b> | <b>REPRESENTATIVE PHOTOGRAPHS .....</b>                | <b>C.1</b> |



## 1.0 INTRODUCTION

AEP Ohio Transmission Company, Inc. (AEP) is proposing to extend a 138 kilovolt (kV) line from an existing 138 kV transmission line (the Project) to a new distribution station in Franklin County, Ohio (Figure 1, Appendix A). The proposed Project area, totaling 3.0 acres, includes 4 new steel pole structures and a pair of parallel electric transmission line extensions within AEP property. The Project area was surveyed for wetlands, waterbodies, open water features, and potential threatened, endangered, and rare species habitat by Stantec Consulting Services Inc. (Stantec) biologists on November 8, 2017 and March 4, 2018. The approximate location of features located up to 50 feet outside of the parcel were also recorded during the field surveys, where landowner access was permitted. However, no data forms were collected on features that did not extend into the parcel. The approximate locations of these features, if observed, are shown on the Figure 2 maps in Appendix A as “approximate” wetlands, streams (waterways), and upland drainage features.

## 2.0 METHODS

### 2.1 WETLAND DELINEATION

Prior to completing the field surveys, a desktop review of the Project area was conducted using U.S. Geological Survey (USGS) topographic mapping, National Wetlands Inventory (NWI) maps, U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil surveys, and aerial imagery mapping. Stantec completed a wetland delineation study in accordance with the *Corps of Engineers Wetlands Delineation Manual* (USACE 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)* (USACE 2010). Wetland categories were classified using the Ohio Rapid Assessment Method (ORAM) for Wetlands Version 5.0 (Mack 2001).

### 2.2 STREAM DELINEATION

Streams that demonstrated a continuously defined channel (bed and bank), ordinary high water mark (OHWM), and the disturbance of terrestrial vegetation were delineated within the Project area, per the protocols outlined in the USACE’s Guidance on Ordinary High Water Mark Identification (Regulatory Guidance Letter, No. 05-05) (USACE 2005). Delineated streams were classified as ephemeral, intermittent, or perennial per definitions in the Federal Register/Vol. 67, No. 10 (USACE 2002). Functional assessment of streams within the Project area was based on completion of the Ohio Environmental Protection Agency’s (OEPA) Headwater Habitat Evaluation Index (HHEI; OEPA 2012) and/or Qualitative Habitat Evaluation Index (QHEI; OEPA 2006). The centerline of each waterway was identified and surveyed using a handheld sub-meter accuracy global positioning system (GPS) unit and mapped with geographic information system (GIS) software. Additionally, the locations of ponds/open water features and upland drainage features (which lacked a continuously defined bed and bank/OHWM) identified within the Project area were also recorded with a sub-meter accuracy GPS unit during the field surveys.

Results

## **2.3 RARE SPECIES**

Prior to conducting the field surveys, Stantec contacted the Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service (USFWS) for information regarding rare, threatened, or endangered species and their habitats of concern within the vicinity of the Project area (Appendix B – Agency Correspondence). To assess potential impacts to rare, threatened, or endangered species, Stantec scientists conducted a pedestrian reconnaissance of the proposed Project area, collected information on existing habitats within the Project area, and assessed the potential for these habitats to be used by these species.

## **3.0 RESULTS**

### **3.1 TERRESTRIAL HABITAT**

Stantec completed field surveys within the Project area on November 8, 2017 and March 4, 2018 for rare, threatened and endangered species or their habitats. Figure 3 (Appendix A) shows the habitats and locations of any identified rare, threatened or endangered species habitat observed within the Project area during the habitat assessment surveys. Representative photographs of the vegetative communities/habitats identified within the Project area are included in Appendix C of this report (photo locations are shown on Figures 2 and 3, Appendix A). Information regarding the vegetative communities/habitats identified within the Project area is provided in Table 1.

**Table 1. Vegetation Communities and Land Cover Found within the Gay-McComb 138 kV Transmission Line Extension Project Area, Franklin County, Ohio**

| <b>Vegetation Communities and Land Cover Types within Project Area</b> | <b>Degree of Human-Related Ecological Disturbance</b>                                                           | <b>Unique, Rare, or High Quality?</b> | <b>Approximate Acreage Within Project Area</b> |
|------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------|------------------------------------------------|
| Old Field                                                              | Extreme Disturbance/Ruderal Community (dominated by opportunistic invaders and/or native highly tolerant taxa). | No                                    | 3.0                                            |
| <b>Total</b>                                                           |                                                                                                                 |                                       | <b>3.0</b>                                     |

### **3.2 WETLANDS**

No wetlands were delineated within the Project area during the site visits performed on November 8, 2017 and March 4, 2018.

### **3.3 STREAMS**

No streams were delineated within the Project area during the site visits performed on November 8, 2017 and March 4, 2018.

Results

### **3.4 OPEN WATER**

No open waterbodies were delineated within the Project area during the site visits performed on November 8, 2017 and March 4, 2018.



3.5 RARE, THREATENED, OR ENDANGERED SPECIES HABITAT

Table 2. Summary of Potential Ohio State-Listed Species within the Gay-McComb 138 kV Transmission Line Extension Project Area, Franklin County, Ohio

| Common Name            | Scientific Name                                   | State <sup>1</sup> Listing | Known to Occur in Franklin County? <sup>2</sup> | Known Within One Mile of Project Area? <sup>3</sup> | Habitat Preference                                                                                                                                                                                                                                                                                          | Potential Habitat Observed in Project Area? | Impact Assessment                                                                                                                                                                                                                                                                            | ODNR Comments/Recommendations                                                                                                                           |
|------------------------|---------------------------------------------------|----------------------------|-------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Butterflies and Moths  |                                                   |                            |                                                 |                                                     |                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                                                                                                                                                                                                              |                                                                                                                                                         |
| Regal Fritallary       | <i>Speyeria idalia</i>                            | E                          | Yes                                             | No                                                  | Occurs in tall grass prairie remnants (Butterflies and Moths of North America 2018). This species prefers open grassland, savannah, and old field habitats; all with varying degrees of hydrology. Heavily treed areas are not utilized due to the impediment of movement and migration (NatureServe 2018). | Yes                                         | Suitable habitat (old field) for this species was observed within the Project area. However, due to the dense urban context of the surrounding landscape and the fragmented nature of the Project area, this species is unlikely to use this habitat. Therefore, no impacts are anticipated. | No comments.                                                                                                                                            |
| Birds                  |                                                   |                            |                                                 |                                                     |                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                                                                                                                                                                                                              |                                                                                                                                                         |
| Upland Sandpiper       | <i>Bartramia longicauda</i>                       | E                          | No                                              | No                                                  | This species breeds in grasslands, pastures, and unkempt agricultural land (ODNR Division of Wildlife 2018b).                                                                                                                                                                                               | Yes                                         | Suitable habitat (old field) for this species was observed within the Project area. However, due to the dense urban context of the surrounding landscape and the fragmented nature of the Project area, this species is unlikely to use this habitat. Therefore, no impacts are anticipated. | Due to the location, the type of work proposed, and the type of habitat present at the Project site, this Project is not likely to impact this species. |
| Amphibians             |                                                   |                            |                                                 |                                                     |                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                                                                                                                                                                                                              |                                                                                                                                                         |
| Eastern Hellbender     | <i>Cryptobranchus alleganiensis alleganiensis</i> | E                          | Yes                                             | No                                                  | Found mostly in unglaciated Ohio and prefers large, swift flowing streams where they hide under larger rocks (ODNR Division of Wildlife 2018b).                                                                                                                                                             | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated.                                                                                                                                                                                             | If no in-water work is proposed, this Project is not likely to impact this aquatic species.                                                             |
| Midland Mud Salamander | <i>Pseudotriton montanus diastictus</i>           | T                          | Yes                                             | No                                                  | This salamander is often observed under large, flat stones. They prefer muddy areas (ODNR Division of Wildlife 2018b).                                                                                                                                                                                      | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated.                                                                                                                                                                                             | If no in-water work is proposed, this Project is not likely to impact this aquatic species.                                                             |
| Fishes                 |                                                   |                            |                                                 |                                                     |                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                                                                                                                                                                                                              |                                                                                                                                                         |
| Popeye Shiner          | <i>Notropis ariommus</i>                          | E                          | Yes                                             | No                                                  | This fish is found in extremely clear waters in moderate sized streams. These streams usually have slow to moderate flow and many long slow pools (ODNR Division of Wildlife 2018b).                                                                                                                        | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated.                                                                                                                                                                                             | If no in-water work is proposed, this Project is not likely to impact this species.                                                                     |

GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results

| Common Name            | Scientific Name                | State <sup>1</sup><br>Listing | Known to<br>Occur in<br>Franklin<br>County? <sup>2</sup> | Known Within<br>One Mile of<br>Project Area? <sup>3</sup> | Habitat Preference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Potential<br>Habitat<br>Observed in<br>Project Area? | Impact Assessment                                                                                | ODNR<br>Comments/Recommendations                                                                                                                              |
|------------------------|--------------------------------|-------------------------------|----------------------------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Spotted Darter         | <i>Etheostoma maculatum</i>    | E                             | Yes                                                      | No                                                        | This fish is found in medium sized rivers and streams. They are typically found in areas of swift current at the top or bottom end of a riffle where there are many very large boulders or flab slabs or rock. They spend most of their time hiding under the upstream edge of these large rocks with their heads sticking out watching for food (ODNR Division of Wildlife 2018b).                                                                                                                                                                                                                                                                                                                 | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Shortnose Gar          | <i>Lepisosteus platostomus</i> | E                             | Yes                                                      | No                                                        | This fish is found in large rivers and associated overflow ponds and backwaters (ODNR Division of Wildlife 2018b).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Scioto Madtom          | <i>Noturus trautmani</i>       | E                             | Yes                                                      | No                                                        | Only 18 individuals of the Scioto madtom have ever been found. Of those, 14 were found in the fall of 1957 and none have been seen since. No other fish has been searched for more persistently by researchers in Ohio than this species. This fish has never been found outside of Ohio and all 18 individuals were found in a small area of Big Darby Creek. They were found in the tail end of riffles over a sand and gravel substrate. Since all the individuals were found in the fall it has been speculated that they may spend the remainder of the year further upstream. They likely eat various aquatic invertebrates like most other madtom species (ODNR Division of Wildlife 2018b). | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Tippecanoe Darter      | <i>Etheostoma tippecanoe</i>   | T                             | Yes                                                      | No                                                        | This fish prefers medium to large streams in the Ohio River drainage system and are found in riffles of moderate current with substrate of gravel or cobble sized rocks (ODNR Division of Wildlife 2018b).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Tonguetied Minnow      | <i>Exoglossum laurae</i>       | T                             | Yes                                                      | No                                                        | Habitat for this fish includes rocky pools and runs of cool to warm water. They prefer clear creeks and small to medium sized rivers of moderate gradient with unsilted bottoms of gravel, cobble, and/or boulder. Spawning occurs in gravel nests in slow to moderate current (NatureServe 2018).                                                                                                                                                                                                                                                                                                                                                                                                  | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Paddlefish             | <i>Polyodon spathula</i>       | T                             | Yes                                                      | No                                                        | This fish is found in the Ohio River and its larger tributaries, preferring sluggish pools and backwater areas (ODNR Division of Wildlife 2018b).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Northern Brook Lamprey | <i>Ichthyomyzon fossor</i>     | E                             | No                                                       | No                                                        | Adults of this species are found in clear brooks with fast flowing water and either sand or gravel bottoms. Juveniles are found in slow moving water buried in soft substrate of medium to large streams (ODNR Division of Wildlife 2018b).                                                                                                                                                                                                                                                                                                                                                                                                                                                         | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | If no in-water work is proposed, this Project is not likely to impact this species.                                                                           |
| Mussels                |                                |                               |                                                          |                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                      |                                                                                                  |                                                                                                                                                               |
| Rayed Bean             | <i>Villosa fabalis</i>         | E                             | Yes                                                      | No                                                        | Habitat includes gravel or sandy substrate, especially in areas of thick roots of aquatic plants, increase substrate stability (Butler 2002, Parmalee and Bogan 1998). Rayed bean can be associated with shoal or riffle areas, and in shallow, wave-washed areas of glacial lakes. It is generally found in smaller, headwater creeks, but sometimes in larger rivers and open-water bodies. It can occur in shallow riffles or in lakes with water depths up to four feet. It has been found in riffles, generally in vegetation, and deeply buried in sand and gravel bound together by roots (Parmalee and Bogan 1998).                                                                         | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |

GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results

| Common Name             | Scientific Name                       | State <sup>1</sup><br>Listing | Known to<br>Occur in<br>Franklin<br>County? <sup>2</sup> | Known Within<br>One Mile of<br>Project Area? <sup>3</sup> | Habitat Preference                                                                                                                                                                                                                                 | Potential<br>Habitat<br>Observed in<br>Project Area? | Impact Assessment                                                                                | ODNR<br>Comments/Recommendations                                                                                                                              |
|-------------------------|---------------------------------------|-------------------------------|----------------------------------------------------------|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fanshell                | <i>Cyprogenia stegaria</i>            | E                             | Yes                                                      | No                                                        | This mussel is found in medium to large streams with gravel substrates and strong current, in both deep and shallow water (NatureServe 2018).                                                                                                      | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | No comments.                                                                                                                                                  |
| Butterfly               | <i>Ellipsaria lineolata</i>           | E                             | Yes                                                      | No                                                        | This mussel is found in large rivers and stretches with pronounced current and substrate of course sand and gravel. It can also be found in deep impoundment areas (NatureServe 2018).                                                             | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | No comments.                                                                                                                                                  |
| Elephant-ear            | <i>Elliptio crassidens crassidens</i> | E                             | Yes                                                      | No                                                        | This mussel is found in muddy sand, sand, and rocky substrates in moderate currents. In some areas, it is common in large creeks to rivers with moderate to swift currents primarily on sand and limestone or rock substrates (NatureServe 2018).  | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Purple Cat's Paw        | <i>Epioblasma obliquata obliquata</i> | E                             | Yes                                                      | No                                                        | This mussel can be found in medium to large rivers with moderate gradient and riffles. Substrates can be sand to gravel (NatureServe 2018).                                                                                                        | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Northern Riffleshell    | <i>Epioblasma torulosa rangiana</i>   | E                             | Yes                                                      | No                                                        | Habitat for this species includes riffles and firmly packed substrates of fine to coarse gravel. This mussel needs highly oxygenated water (NatureServe 2018).                                                                                     | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Snuffbox                | <i>Epioblasma triquetra</i>           | E                             | Yes                                                      | No                                                        | Snuffbox is commonly found buried in the substrate. It is found in a wide range of particle sized substrates, however, swift shallow riffles with sand and gravel are where it is typically found (Parmalee and Bogan 1998, Watters et al. 2009).  | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Ebonyshell              | <i>Fusconaia ebena</i>                | E                             | Yes                                                      | No                                                        | This species inhabits large rivers and prefers swift water and stable sand or gravel shoals. Coarse sand and gravel substrate provides the most suitable habitat. It can occur at depths of 10-15 feet with current associated (NatureServe 2018). | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | No comments.                                                                                                                                                  |
| Long-Solid              | <i>Fusconaia maculata maculata</i>    | E                             | Yes                                                      | No                                                        | This species is found in medium to large rivers in gravel with a strong current (NatureServe 2018).                                                                                                                                                | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Sharp-ridged Pocketbook | <i>Lampsilis ovata</i>                | E                             | Yes                                                      | No                                                        | This mussel is a generalist, occurring in different sized streams/rivers. Typically occurs in moderate to strong current with substrates of gravel and coarse sand (NatureServe 2018).                                                             | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |

GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results

| Common Name         | Scientific Name                       | State <sup>1</sup><br>Listing | Known to<br>Occur in<br>Franklin<br>County? <sup>2</sup> | Known Within<br>One Mile of<br>Project Area? <sup>3</sup> | Habitat Preference                                                                                                                                                                                                                                                                                                                                                                                                                            | Potential<br>Habitat<br>Observed in<br>Project Area? | Impact Assessment                                                                                | ODNR<br>Comments/Recommendations                                                                                                                              |
|---------------------|---------------------------------------|-------------------------------|----------------------------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Washboard           | <i>Megalonaias nervosa</i>            | E                             | Yes                                                      | No                                                        | Occurs in large rivers, typically in main channel or overbank areas of reservoirs. It is found in areas of slow current with muddy to coarse gravel substrates and water can be up to 50 feet (NatureServe 2018).                                                                                                                                                                                                                             | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Clubshell           | <i>Pleurobema clava</i>               | E                             | Yes                                                      | No                                                        | Clubshell is found in small to medium rivers, but occasionally found in large rivers, especially those having large shoal areas. It is generally found in clean, coarse sand and gravel in runs, often just downstream of a riffle and cannot tolerate mud or slackwater conditions (USFWS 1994). Badra (2001) found the clubshell in gravel/sand substrate, runs having laminar flow (0.06-0.25 m/sec) within small to medium sized streams. | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Ohio Pigtoe         | <i>Pleurobema cordatum</i>            | E                             | Yes                                                      | No                                                        | Occurs in medium to large rivers directly above riffles of gravel, cobble, and boulder, but occasionally in muddy or sandy or gravel habitats at great depths (NatureServe 2018).                                                                                                                                                                                                                                                             | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Rabbitsfoot         | <i>Quadrula cylindrica cylindrica</i> | E                             | Yes                                                      | No                                                        | The typical habitat for this species is small to medium rivers with moderate to swift currents, and in smaller streams it inhabits bars or gravel and cobble close to the fast current. Found in medium to large rivers in sand and gravel shoals (NatureServe 2018).                                                                                                                                                                         | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Wartyback           | <i>Quadrula nodulata</i>              | E                             | Yes                                                      | No                                                        | Occurs in medium to large rivers generally in pools with depths up to 15-18 feet. Substrates include sand and mud (NatureServe 2018).                                                                                                                                                                                                                                                                                                         | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | No comments.                                                                                                                                                  |
| Threehorn Wartyback | <i>Obliquaria reflexa</i>             | T                             | Yes                                                      | No                                                        | Habitat includes large rivers with moderately strong current and stable substrate of gravel, sand, and mud (NatureServe 2018).                                                                                                                                                                                                                                                                                                                | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Black Sandshell     | <i>Ligumia recta</i>                  | T                             | Yes                                                      | No                                                        | Typically found in medium-sized to large rivers in locations with strong current and substrates of coarse sand and gravel with cobbles in water depths from several inches to six feet or more (NatureServe 2018).                                                                                                                                                                                                                            | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |
| Fawnsfoot           | <i>Truncilla donaciformis</i>         | T                             | Yes                                                      | No                                                        | This species occurs in both large and medium-sized rivers at normal depths varying from less than three feet up to 15 to 18 feet in big rivers such as the Tennessee. A substrate of either sand or mud is suitable and although it is typically found in moderate current, it can adapt to a lake or embayment environment lacking current (NatureServe 2018).                                                                               | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | 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. |



GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results

| Common Name                                                                                                                                                                                                                                                   | Scientific Name                  | State <sup>1</sup><br>Listing | Known to<br>Occur in<br>Franklin<br>County? <sup>2</sup> | Known Within<br>One Mile of<br>Project Area? <sup>3</sup> | Habitat Preference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Potential<br>Habitat<br>Observed in<br>Project Area? | Impact Assessment                                                                                                                | ODNR<br>Comments/Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------|----------------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pondhorn                                                                                                                                                                                                                                                      | <i>Uniomerus<br/>tetralasmus</i> | T                             | Yes                                                      | No                                                        | This species typically inhabits the quiet or slow-moving, shallow waters of sloughs, borrow pits, ponds, ditches, and meandering streams. It is tolerant of poor water conditions and can be found well buried in a substrate of fine silt and/or mud. It has been known to survive for extended periods of time when a pond or slough has temporarily dried up by burying itself deep into the substrate (NatureServe 2018).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | No                                                   | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated.                                 | 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.                                                                                                                                                                                                                                                                                                                   |
| Mammals                                                                                                                                                                                                                                                       |                                  |                               |                                                          |                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                      |                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Indiana Bat                                                                                                                                                                                                                                                   | <i>Myotis sodalis</i>            | E                             | Yes                                                      | No                                                        | The Indiana bat is likely distributed over the entire state of Ohio, though not uniformly. This species generally forages in openings and edge habitats within upland and floodplain forest, but they also forage over old fields and pastures (Brack et al. 2010). Natural roost structures include trees (live or dead) with exfoliating bark, and exposure to solar radiation. Other important factors for roost trees include relative location to other trees, a permanent water source and foraging areas. Dead trees are preferred as maternity roosts; however, live trees are often used as secondary roosts depending on microclimate conditions (USFWS 2007; USFWS 2018a). Roosts have also occasionally been found to consist of cracks and hollows in trees, utility poles, buildings, and bat boxes. Primarily use caves for hibernacula, although are also known to hibernate in abandoned underground mines (Brack et al. 2010). | No                                                   | No suitable winter hibernacula or summer roost habitat were observed in the Project area. Therefore, no impacts are anticipated. | If suitable habitat occurs within the Project area, the ODNR recommends trees be conserved. If suitable habitat occurs within the Project area and trees must be cut, the ODNR recommends cutting occur between October 1 and March 31. If suitable trees must be cut during summer months, the ODNR recommends a net survey be conducted between June 1 and August 15, prior to cutting. If no tree removal is proposed, this Project is not likely to impact the Indiana bat. |
| <sup>1</sup> E=Endangered; T=Threatened<br><sup>2</sup> According to Ohio Department of Natural Resources, State Listed Wildlife Species by County (ODNR Division of Wildlife 2017a).<br><sup>3</sup> According to Ohio Natural Heritage Program (Appendix B) |                                  |                               |                                                          |                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                      |                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results

Table 3. Summary of Potential Federally-Listed Species within the Gay-McComb 138 kV Transmission Line Extension Project Area, Franklin County, Ohio

| Common Name             | Scientific Name                     | Federal Listing <sup>1</sup> | Known to Occur in Franklin County? | Habitat Preference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Potential Habitat Observed in Project Area? | Impact Assessment                                                                                                                | USFWS Comments/ Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------|-------------------------------------|------------------------------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mammals                 |                                     |                              |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                             |                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Indiana Bat             | <i>Myotis sodalis</i>               | E                            | Yes                                | The Indiana bat is likely distributed over the entire state of Ohio, though not uniformly. This species generally forages in openings and edge habitats within upland and floodplain forest, but they also forage over old fields and pastures (Brack et al. 2010). Natural roost structures include trees (live or dead) with exfoliating bark, and exposure to solar radiation. Other important factors for roost trees include relative location to other trees, a permanent water source and foraging areas; Dead trees are preferred as maternity roosts; however, live trees are often used as secondary roosts depending on microclimate conditions (USFWS 2007; USFWS 2018a). Roosts have also occasionally been found to consist of cracks and hollows in trees, utility poles, buildings, and bat boxes. Primarily use caves for hibernacula, although are also known to hibernate in abandoned underground mines (Brack et al. 2010). | No                                          | No suitable winter hibernacula or summer roost habitat were observed in the Project area. Therefore, no impacts are anticipated. | The proposed Project is in the vicinity of one or more confirmed records of Indiana bats. Therefore, USFWS recommends that trees ≥ 3 inches dbh be saved wherever possible. Because this Project will result in a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to these species. Since Indiana bat presence in the vicinity of the Project has been confirmed, clearing of trees ≥ 3 inches dbh during the summer roosting season, may result in direct take of individuals. Following seasonal tree clearing recommendation should ensure that any effects to the Indiana bats are insignificant or discountable. |
| Northern Long-eared Bat | <i>Myotis septentrionalis</i>       | T                            | Yes                                | The northern long-eared bat is found throughout Ohio. This species generally forages in forested habitat and openings in forested habitat and utilizes cracks, cavities, and loose bark within live and dead trees, as well as buildings as roosting habitat (Brack et al. 2010; USFWS 2018c). The species utilizes caves and abandoned mines as winter hibernacula. Various sized caves are used providing they have a constant temperature, high humidity, and little to no air current (Brack et al. 2010).                                                                                                                                                                                                                                                                                                                                                                                                                                   | No                                          | No suitable winter hibernacula or summer roost habitat were observed in the Project area. Therefore, no impacts are anticipated. | Should the proposed site contain trees ≥ 3 inches dbh, USFWS recommends that trees be saved wherever possible. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, USFWS recommend that removal or any trees ≥ 3 inches dbh only occur between October 1 and March 31.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Mussels                 |                                     |                              |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                             |                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Clubshell               | <i>Pleurobema clava</i>             | E                            | Yes                                | Clubshell is found in small to medium rivers, but occasionally found in large rivers, especially those having large shoal areas. It is generally found in clean, coarse sand and gravel in runs, often just downstream of a riffle and cannot tolerate mud or slackwater conditions (USFWS 1994). Badra (2001) found the clubshell in gravel/sand substrate, runs having laminar flow (0.06-0.25 m/sec) within small to medium sized streams.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated.                                 | Due to the project type, size, and location, USFWS does not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Northern Riffleshell    | <i>Epioblasma torulosa rangiana</i> | E                            | Yes                                | Habitat for this species includes riffles and firmly packed substrates of fine to coarse gravel. This mussel needs highly oxygenated water (NatureServe 2018).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated.                                 | Due to the project type, size, and location, USFWS does not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results

| Common Name                                                                         | Scientific Name                       | Federal Listing <sup>1</sup> | Known to Occur in Franklin County? | Habitat Preference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Potential Habitat Observed in Project Area? | Impact Assessment                                                                                | USFWS Comments/ Recommendations                                                                         |
|-------------------------------------------------------------------------------------|---------------------------------------|------------------------------|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Rayed Bean                                                                          | <i>Villosa fabalis</i>                | E                            | Yes                                | Habitat includes gravel or sandy substrate, especially in areas of thick roots of aquatic plants, increase substrate stability (Butler 2002, Parmalee and Bogan 1998). Rayed bean can be associated with shoal or riffle areas, and in shallow, wave-washed areas of glacial lakes. It is generally found in smaller, headwater creeks, but sometimes in larger rivers and open-water bodies. It can occur in shallow riffles or in lakes with water depths up to four feet. It has been found in riffles, generally in vegetation, and deeply buried in sand and gravel bound together by roots (Parmalee and Bogan 1998). | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | Due to the project type, size, and location, USFWS does not anticipate adverse effects to this species. |
| Snuffbox                                                                            | <i>Epioblasma triquetra</i>           | E                            | Yes                                | Snuffbox is commonly found buried in the substrate. It is found in a wide range of particle sized substrates, however, swift shallow riffles with sand and gravel are where it is typically found (Parmalee and Bogan 1998, Watters et al. 2009).                                                                                                                                                                                                                                                                                                                                                                           | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | Due to the project type, size, and location, USFWS does not anticipate adverse effects to this species. |
| Rabbitsfoot                                                                         | <i>Quadrula cylindrica cylindrica</i> | T                            | Yes                                | The typical habitat for this species is small to medium rivers with moderate to swift currents, and in smaller streams it inhabits bars or gravel and cobble close to the fast current. Found in medium to large rivers in sand and gravel shoals (NatureServe 2018).                                                                                                                                                                                                                                                                                                                                                       | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | Due to the project type, size, and location, USFWS does not anticipate adverse effects to this species. |
| Fish                                                                                |                                       |                              |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                  |                                                                                                         |
| Scioto Madtom                                                                       | <i>Noturus trautmani</i>              | E                            | Yes                                | This fish prefers tail end of riffles with sand and gravel substrate (ODNR Division of Wildlife 2018b).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | Due to the project type, size, and location, USFWS does not anticipate adverse effects to this species. |
| Plants                                                                              |                                       |                              |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                  |                                                                                                         |
| Running Buffalo Clover                                                              | <i>Trifolium stoloniferum</i>         | E                            | Yes                                | Mesic habitats with partial to filtered sunlight including woodlands and mowed lawn (USFWS 2018d).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No                                          | No suitable habitat was observed within the Project area. Therefore, no impacts are anticipated. | Due to the project type, size, and location, USFWS does not anticipate adverse effects to this species. |
| <sup>1</sup> E=Endangered; T=Threatened<br><sup>2</sup> According to USFWS (2018b). |                                       |                              |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                             |                                                                                                  |                                                                                                         |

## 4.0 CONCLUSIONS AND RECOMMENDATIONS

Stantec conducted a wetland and waterbodies delineation and a preliminary habitat assessment for threatened and endangered species and their habitats within the Project area on November 8, 2017 and March 4, 2018. During the field surveys, no wetlands or waterbodies were identified within the Project area.

The information provided by Stantec regarding wetland and stream presence is based on an analysis of the conditions present within the Project area at the time of the fieldwork. The delineations were performed by experienced and qualified professionals using regulatory agency-accepted practices and sound professional judgment.

During field surveys, potentially suitable habitat (grasslands and old field) for the regal fritillary butterfly and upland sandpiper was observed within the Project area. However, due to the dense urban context of the surrounding landscape and the fragmented nature of the Project area these species are unlikely to use this habitat. No suitable habitat was observed for any other state listed species within the Project area.

An environmental review request letter was submitted to the ODNR-Office of Real Estate. According to the ODNR Natural Heritage Database, an Ohio potentially threatened plant species, the pale umbrella-sedge (*Cyperus acuminatus*), has been recorded within a one-mile radius of the Project area. The response letter also indicated that the Project area is within range of the Indiana bat, fifteen state-listed freshwater mussel species, eight state-listed fish species, and the upland sandpiper (Table 2). No habitat was observed during field surveys for the Indiana bat or any aquatic species. 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 aquatic species. During field surveys, potentially suitable habitat (old field) for the upland sandpiper was observed within the Project area. However, the ODNR-Office of Real Estate response letter indicated that due to the Project location, the type of work proposed, and the type of habitat present at the Project site, this Project is not likely to impact this species.

A technical assistance request letter was submitted to the USFWS. The USFWS found no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area. The USFWS response letter indicated that the proposed Project area is in the vicinity of one or more confirmed records of Indiana bats. Therefore, USFWS recommends that trees  $\geq 3$  inches dbh be saved wherever possible. The response indicated that this Project will likely result in only a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to this species. Since Indiana bat presence in the vicinity of the Project has been confirmed, clearing of trees  $\geq 3$  inches dbh during the summer roosting season, may result in direct take of individuals. Following the seasonal tree clearing recommendation should ensure that any effects to the Indiana bats and northern long-eared bats are insignificant or discountable (Appendix B). No suitable winter hibernacula or summer roost habitat for both bat species was present within the Project area.

Due to the Project type, size, and location, USFWS does not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. The USFWS recommends that the proposed Project avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat. Best management practices should be used to minimize erosion, especially on slopes.



References

## 5.0 REFERENCES

- Badra, P. J. 2001. Special animal abstract for *Pleurobema clava* (northern clubshell). Lansing, Michigan: Michigan Natural Features Inventory.
- Brack, Virgil Jr., Dale W. Sparks, John O. Whitaker Jr., Brianne L. Walters, and Angela Boyer. 2010. Bats of Ohio. Indiana State University Center for North American Bat Research and Conservation.
- Butler, R. S. 2002. Status assessment report for the rayed bean, *Villosa fabalis*, occurring in the Mississippi River and Great Lakes systems. U.S. Fish and Wildlife Service Regions 3, 4, and 5, and Canada. 62 pp.
- Butterflies and Moths of North America. 2017. Available at <http://www.butterfliesandmoths.org/species/Speyeria-idalia>. Accessed April 2018.
- Mack, J.J. 2001. Ohio Rapid Assessment Method for Wetlands, Manual for Using Version 5.0. Ohio EPA Technical Bulletin Wetland/2001-1-1. Ohio Environmental Protection Agency, Division of Surface Water, 401 Wetland Ecology Unit, Columbus, Ohio.
- NatureServe. 2018. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.0. NatureServe, Arlington, VA. U.S.A. Available at <http://explorer.natureserve.org>. Accessed April 2018.
- ODNR Division of Wildlife. 2018a. State Listed Wildlife Species by County. Available at <http://wildlife.ohiodnr.gov/species-and-habitats/state-listed-species/state-listed-species-by-county>. Accessed April 2018.
- ODNR Division of Wildlife. 2018b. Species Guide Index. Available at <http://wildlife.ohiodnr.gov/species-and-habitats/species-guide-index/>. Accessed April 2018.
- Ohio Environmental Protection Agency (OEPA). 2006. Methods for Assessing Habitat in Flowing Waters: Using the Qualitative Habitat Evaluation Index (QHEI). 25 pp.
- OEPA. 2012. Field Evaluation Manual for Ohio's Primary Headwater Habitat Streams, Version 3.0. Ohio EPA Division of Surface Water, Columbus, Ohio. 117 pp.
- Parmalee, P. W. and A. E. Bogan. 1998. The Freshwater Mussels of Tennessee. University of Tennessee Press: Knoxville, Tennessee. 328 pp.
- U.S. Army Corps of Engineers (USACE), Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1, U.S. Army Engineer Waterway Experiment Station, Vicksburg, Mississippi.
- USACE. 2002. Issuance of Nationwide Permits; Notice, 67 Fed. Reg. 10. January 15, 2002. Federal Register: The Daily Journal of the United States. Available at <https://www.gpo.gov/fdsys/pkg/FR-2002-01-15/pdf/02-539.pdf>.

## GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION PROJECT

### References

- USACE. 2005. *Guidance on Ordinary High Water Mark Identification* (Regulatory Guidance Letter, No. 05-05). Available online at <http://www.usace.army.mil/Portals/2/docs/civilworks/RGLS/rgl05-05.pdf>. Accessed April 2018.
- USACE. 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)*, ed. J. S. Wakeley, R. W. Lichvar, and C. V. Noble. ERDC/EL TR-10-16. Vicksburg, MS: U.S. Army Engineer Research and Development Center.
- United States Fish and Wildlife Service (USFWS). 1994. Clubshell (*Pleurobema clava*) and Northern Riffleshell (*Epioblasma torulosa rangiana*) Recovery Plan. Prepared for the U.S. Fish and Wildlife Service, Hadley, Massachusetts. 68 pp.
- USFWS. 2007. Indiana bat (*Myotis sodalis*) draft recovery plan: First revision. U.S. Fish and Wildlife Service, Ft. Snelling, Minnesota. 258 pp.
- USFWS. 2018a. 2017 Range-wide Indiana Bat Summer Survey Guidelines, April 2017. Available at <https://www.fws.gov/midwest/endangered/mammals/inba/inbasummersurveyguidance.html>. Accessed April 2018.
- USFWS. 2018b. Federally Listed Species by Ohio Counties. Available at <https://www.fws.gov/midwest/endangered/lists/ohio-spp.html>. Accessed April 2018.
- USFWS. 2018c. Environmental Conservation Online System (ECOS): Species Profile for Northern Long-eared Bat (*Myotis septentrionalis*). Available online at [https://ecos.fws.gov/tess\\_public/profile/speciesProfile?sPCODE=A0JE](https://ecos.fws.gov/tess_public/profile/speciesProfile?sPCODE=A0JE). Accessed April 2018.
- USFWS. 2018d. Running Buffalo Clover (*Trifolium stoloniferum*). Available at <https://www.fws.gov/midwest/endangered/plants/runningb.html>. Accessed April 2018.
- Watters, G. T., M. A. Hoggarth, and D. H. Stansbery. 2009. The Freshwater Mussels of Ohio. The Ohio State University Press, Columbus, OH. 421 pp.

## Appendix A **FIGURES**

### A.1 **FIGURE 1 – PROJECT LOCATION MAP**



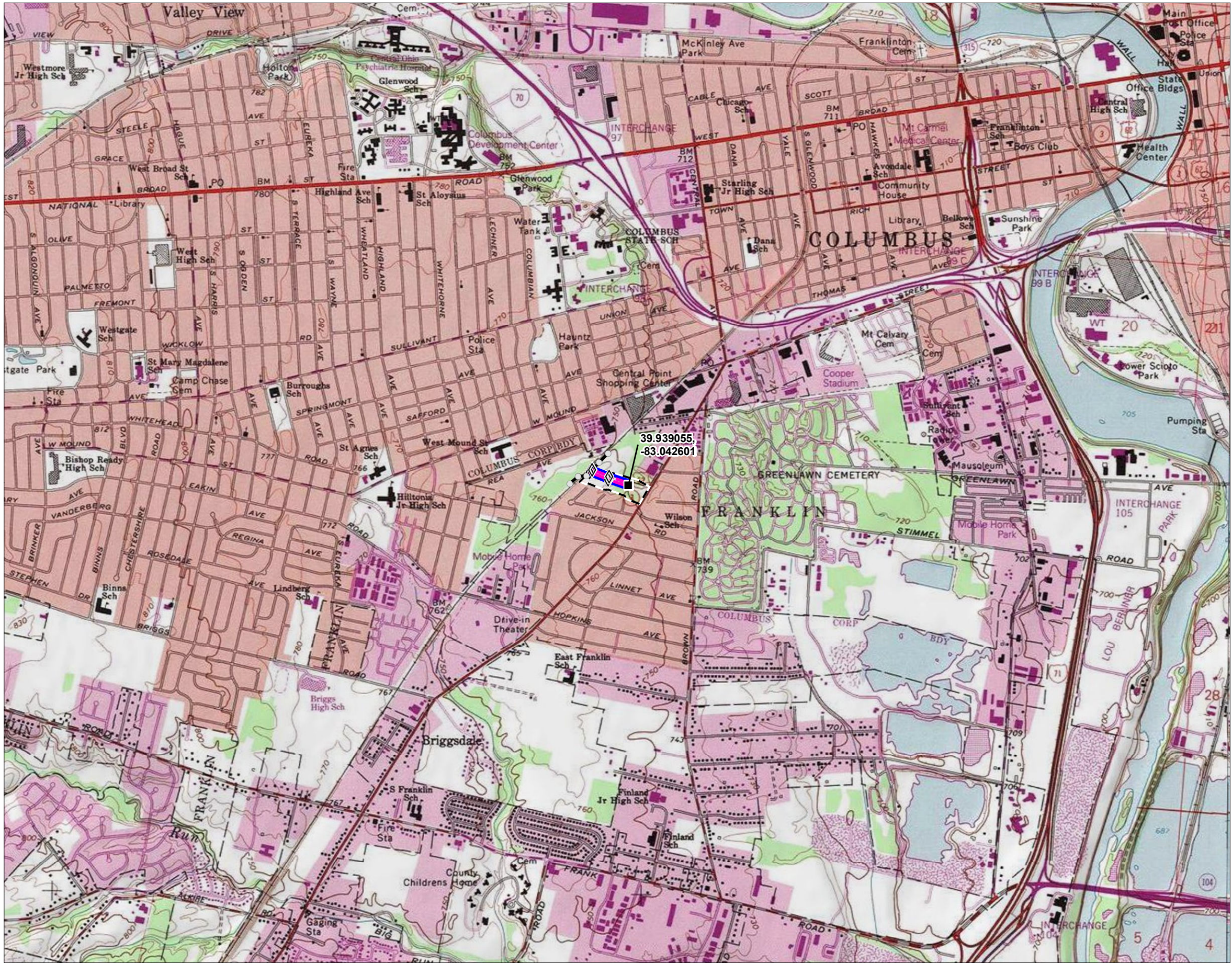
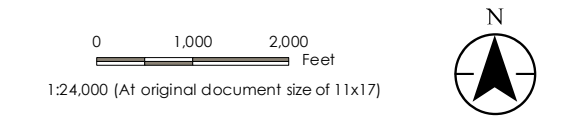


Figure No. 1  
Title  
**Project Location Map**

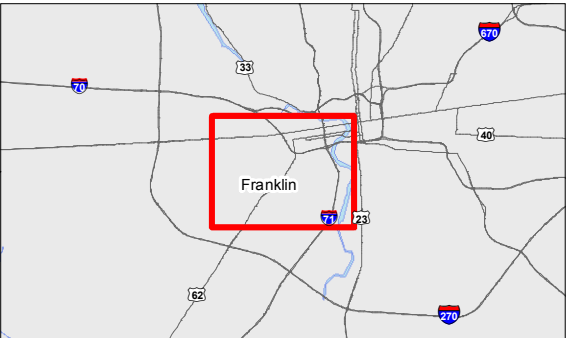
Client/Project  
AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line  
Extension Project

Project Location  
Franklin County, OH

193705748  
Prepared by JLH on 2018-04-03  
Technical Review by KC on 2018-04-26  
Independent Review by MT on 2018-04-27



- Legend
- Proposed Distribution Station
  - Existing Structure
  - ◇ Proposed Structure
  - Gay-McComb 138 kV Transmission Line
  - - - Proposed 138 kV Transmission Line
  - Project Area (100' ROW)
  - - - Property Boundary



- Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
  2. Data Sources Include: Stantec, AEP, NADS
  3. Background: USGS 7.5' Topographic Quadrangles - Southwest Columbus, OH (1983)





## **A.2    FIGURE 2 – WETLAND AND WATERBODY DELINEATION MAP**



V:\1937\Activa\193705748\03\_data\03\_cad\03\mxd\eco\_figures\fig2\_env\fig011.eco\_193705748\_line\_and.mxd    Revised: 2018-07-05 By: J.Hedeman



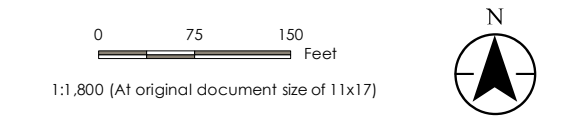
Figure No.  
**2**

Title  
**Wetland and Waterbody  
Delineation Map**

Client/Project  
AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line  
Extension Project

Project Location  
Franklin County, OH

193705748  
Prepared by JLH on 2018-04-03  
Technical Review by KC on 2018-04-26  
Independent Review by MT on 2018-04-27



Legend

■

Proposed Distribution Station

○

Existing Structure

◇

Proposed Structure

—

Gay-McComb 138 kV Transmission Line

- - -

Proposed 138 kV Transmission Line

□

Project Area (100' ROW)

- - -

Property Boundary

○

Photo Location

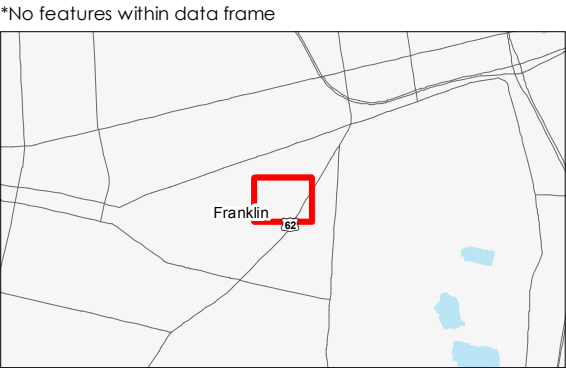
FEMA Flood Hazard Area\*

▨

100-year Flood Zone

▨

100-year Floodway



- Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources Include: Stantec, AEP, USGS, FEMA, NADS, OGRIP
3. Orthophotography: 2015 NAIP



### **A.3    FIGURE 3 – HABITAT ASSESSMENT MAP**





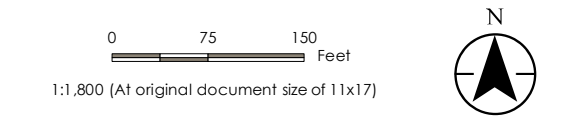
Figure No.  
**3**

Title  
**Habitat Assessment Map**

Client/Project  
AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line  
Extension Project

Project Location  
Franklin County, OH

193705748  
Prepared by JLH on 2018-04-03  
Technical Review by KC on 2018-04-26  
Independent Review by MT on 2018-04-27



Legend

■

Proposed Distribution Station

○

Existing Structure

◇

Proposed Structure

—

Gay-McComb 138 kV Transmission Line

—

Proposed 138 kV Transmission Line

—

Project Area (100' ROW)

—

Property Boundary

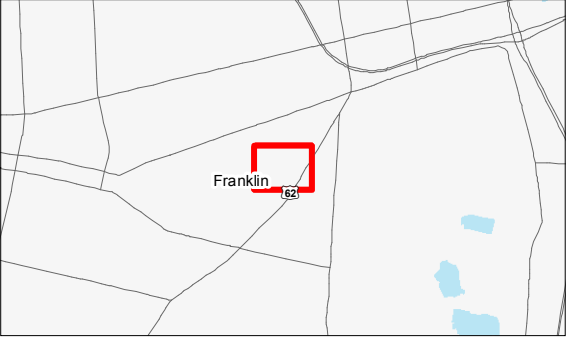
○

Photo Location

Habitat Area

—

Old Field



- Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources Include: Stantec, AEP, USGS, NADS, OGRIP
3. Orthophotography: 2015 NAIP

## **Appendix B   AGENCY 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

January 26, 2018

Kim Carter  
Stantec  
1500 Lake Shore Drive Suite 100  
Columbus OH 43204-3800

**Re:** 18-003; Request for Environmental Review, Reaver Station Project

**Project:** The proposed project involves the construction of a 138-kV substation within the 10.4 acres parcel.

**Location:** The proposed project is in the City of Columbus, Franklin 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 record at or within a one-mile radius of the project area:

Pale umbrella-sedge (*Cyperus acuminatus*), State potentially threatened

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 you specified in your 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 the purple cat's paw (*Epioblasma o. obliquata*), a state endangered and federally endangered mussel, the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, the northern riffleshell (*Epioblasma torulosa rangiana*), a state endangered and federally endangered mussel, the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel species, the rabbitsfoot (*Quadrula cylindrica cylindrica*), a state endangered and federal candidate mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federal endangered mussel, the long solid (*Fusconaia maculata maculata*), a state endangered mussel, the Ohio pigtoe (*Pleurobema cordatum*), a state endangered mussel, the pocketbook (*Lampsilis ovata*), a state endangered mussel, the washboard (*Megaloniais nervosa*), a state endangered mussel, the elephant-ear (*Elliptio crassidens crassidens*), a state endangered mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, the threehorn wartyback (*Obliquaria reflexa*), a state threatened mussel, the pondhorn (*Unio merus tetralasmus*), a state threatened mussel, and the fawnsfoot (*Truncilla donaciformis*), a state threatened 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 these species.

The project is within the range of the Scioto madtom (*Noturus trautmani*), a state endangered and federally endangered fish, the popeye shiner (*Notropis ariommus*), a state endangered fish, the northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, the spotted darter (*Etheostoma maculatum*), a state endangered fish, the shortnose gar (*Lepisosteus platostomus*), a state endangered fish, the tonguetied minnow (*Exoglossum laurae*), a state threatened fish, the paddlefish (*Polyodon spathula*) a state threatened fish, and the Tippecanoe darter (*Etheostoma tippecanoe*), a state threatened fish. The DOW 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.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). Due to the location, the type of work proposed, and the type of habitat present at the project site, 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](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



From: Ohio, FW3 <[ohio@fws.gov](mailto:ohio@fws.gov)>

Date: Tue, Nov 21, 2017 at 1:10 PM

Subject: Stantec File: 193705748 AEP Reaver 138 kV Substation Project, Franklin Co.

To: [kim.carter@stantec.com](mailto:kim.carter@stantec.com)

Cc: [nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us), [kate.parsons@dnr.state.oh.us](mailto:kate.parsons@dnr.state.oh.us)



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



TAILS# 03E15000-2018-TA-0214

Dear Ms. Carter,

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  $\geq 3$  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.

**The proposed project is in the vicinity of one or more confirmed records of Indiana bats.** Therefore, we recommend that trees  $\geq 3$  inches dbh be saved wherever possible. Because the project will result in a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to these species. Since Indiana bat presence in the vicinity of the project

has been confirmed, clearing of trees  $\geq 3$  inches dbh during the summer roosting season may result in direct take of individuals. 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 tree removal is unavoidable, we recommend that removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Following this seasonal tree clearing recommendation should ensure that any effects to Indiana bats and northern long-eared bats are insignificant or discountable. **Please note that, because Indiana bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.**

Should the proposed site contain trees  $\geq 3$  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  $\geq 3$  inches dbh cannot be avoided, we recommend that removal of any trees  $\geq 3$  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](mailto: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](mailto:ohio@fws.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Everson". The signature is fluid and cursive, with the first name "Dan" being more prominent than the last name "Everson".

Dan Everson

Field Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW

## Appendix C REPRESENTATIVE PHOTOGRAPHS



AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line Extension Project  
Franklin County, Ohio



Photo Location 1. Representative view of old field habitat. Photograph taken facing east.



Photo Location 2. Representative view of old field habitat. Photograph taken facing west.



AEP Ohio Transmission Company, Inc.  
Gay-McComb 138 kV Transmission Line Extension Project  
Franklin County, Ohio



Photo Location 3. Representative view of old field habitats. Photograph taken facing north.



Photo Location 4. Representative view of old field habitat. Photograph taken facing northwest.

**LETTER OF NOTIFICATION FOR GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION  
PROJECT**

**Appendix C Agency 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

January 26, 2018

Kim Carter  
Stantec  
1500 Lake Shore Drive Suite 100  
Columbus OH 43204-3800

**Re:** 18-003; Request for Environmental Review, Reaver Station Project

**Project:** The proposed project involves the construction of a 138-kV substation within the 10.4 acres parcel.

**Location:** The proposed project is in the City of Columbus, Franklin 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 record at or within a one-mile radius of the project area:

Pale umbrella-sedge (*Cyperus acuminatus*), State potentially threatened

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 you specified in your 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 the purple cat's paw (*Epioblasma o. obliquata*), a state endangered and federally endangered mussel, the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, the northern riffleshell (*Epioblasma torulosa rangiana*), a state endangered and federally endangered mussel, the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel species, the rabbitsfoot (*Quadrula cylindrica cylindrica*), a state endangered and federal candidate mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federal endangered mussel, the long solid (*Fusconaia maculata maculata*), a state endangered mussel, the Ohio pigtoe (*Pleurobema cordatum*), a state endangered mussel, the pocketbook (*Lampsilis ovata*), a state endangered mussel, the washboard (*Megaloniais nervosa*), a state endangered mussel, the elephant-ear (*Elliptio crassidens crassidens*), a state endangered mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, the threehorn wartyback (*Obliquaria reflexa*), a state threatened mussel, the pondhorn (*Unio merus tetralasmus*), a state threatened mussel, and the fawnsfoot (*Truncilla donaciformis*), a state threatened 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 these species.

The project is within the range of the Scioto madtom (*Noturus trautmani*), a state endangered and federally endangered fish, the popeye shiner (*Notropis ariommus*), a state endangered fish, the northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, the spotted darter (*Etheostoma maculatum*), a state endangered fish, the shortnose gar (*Lepisosteus platostomus*), a state endangered fish, the tonguetied minnow (*Exoglossum laurae*), a state threatened fish, the paddlefish (*Polyodon spathula*) a state threatened fish, and the Tippecanoe darter (*Etheostoma tippecanoe*), a state threatened fish. The DOW 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.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). Due to the location, the type of work proposed, and the type of habitat present at the project site, 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](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

From: Ohio, FW3 <[ohio@fws.gov](mailto:ohio@fws.gov)>

Date: Tue, Nov 21, 2017 at 1:10 PM

Subject: Stantec File: 193705748 AEP Reaver 138 kV Substation Project, Franklin Co.

To: [kim.carter@stantec.com](mailto:kim.carter@stantec.com)

Cc: [nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us), [kate.parsons@dnr.state.oh.us](mailto:kate.parsons@dnr.state.oh.us)



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



TAILS# 03E15000-2018-TA-0214

Dear Ms. Carter,

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  $\geq 3$  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.

**The proposed project is in the vicinity of one or more confirmed records of Indiana bats.** Therefore, we recommend that trees  $\geq 3$  inches dbh be saved wherever possible. Because the project will result in a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to these species. Since Indiana bat presence in the vicinity of the project

has been confirmed, clearing of trees  $\geq 3$  inches dbh during the summer roosting season may result in direct take of individuals. 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 tree removal is unavoidable, we recommend that removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Following this seasonal tree clearing recommendation should ensure that any effects to Indiana bats and northern long-eared bats are insignificant or discountable. **Please note that, because Indiana bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.**

Should the proposed site contain trees  $\geq 3$  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  $\geq 3$  inches dbh cannot be avoided, we recommend that removal of any trees  $\geq 3$  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](mailto: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](mailto:ohio@fws.gov).



Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Everson". The signature is fluid and cursive, with the first name "Dan" being more prominent than the last name "Everson".

Dan Everson

Field Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW



In reply, refer to  
2017-FRA-39848

June 15, 2018

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

**RE: T-Line Area Connecting to the Proposed Reaver Station, City of Columbus, Franklin County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received on May 18, 2018 regarding the proposed T-Line Area Connecting to the Proposed Reaver Station, City of Columbus, Franklin 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 (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for a 2.0 ha (4.9 ac) T-Line Area Connecting to the Proposed Reaver Station in the City of Columbus, Franklin County, Ohio* by Weller & Associates, Inc. (2018).

A literature review, visual inspection, shovel probe excavation, and shovel test unit excavation was completed as part of the investigations. Four (4) previously identified archaeological sites (OAI#33FR3091-33FR3094) were identified during the 2017 investigation for the Reaver Station (OHPOID#2017-FRA-39848, coordination letter issued September 12, 2017). None of the sites were recommended eligible for listing in the National Register of Historic Places (NRHP). No new sites were identified during this survey. Based on the information provided, we agree no additional archaeological survey is needed.

The following comments pertain to the *History/Architecture Investigations for a 2.0 ha (4.9 ac) T-Line Area to Connect to the Proposed Reaver Station in the City of Columbus, Franklin County, Ohio* by Weller & Associates, Inc. (2018).

The investigations included a background research and a systematic approach to identifying all properties 50 years of age or older within the project area or that have a potential view of the proposed project. No properties over 50 years of age were identified in the project area or within the viewshed of the project area. Therefore, we agree that the project as proposed will have no effect on historic properties.

Based on the information provided, we agree the project will not affect 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.

RPR Serial No: 1074071, 1074072

Mr. Ryan Weller  
Page 2  
June 15, 2018

If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorrocks@ohiohistory.org](mailto:khorrocks@ohiohistory.org), or Joy Williams at [jwilliams@ohiohistory.org](mailto:jwilliams@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: 1074071, 1074072

**OHIO HISTORY CONNECTION**

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

**LETTER OF NOTIFICATION FOR GAY-MCCOMB 138 KV TRANSMISSION LINE EXTENSION  
PROJECT**

**Appendix D Ohio Power Company's Long Term Forecast Report**



PUCO FORM FE-T9  
AEP OHIO  
SPECIFICATION OF PLANNED ELECTRIC TRANSMISSION LINES

Filed May 31, 2018

|     |                                                            |                                                                                             |
|-----|------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| 1.  | LINE NAME AND (PJM NUMBER):                                | Gay St-Reaver 138kV (S1606.4)                                                               |
| 2.  | POINTS OF ORIGIN AND TERMINATION                           | Gay St, Reaver; INTERMEDIATE STATION - Sullivant Terminal                                   |
| 3.  | RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS                   | 0.1 mi / 100 ft / single-circuit                                                            |
| 4.  | VOLTAGE: DESIGN / OPERATE                                  | 138kV / 138kV                                                                               |
| 5.  | APPLICATION FOR CERTIFICATE:                               | Construction notice or LON in 2018-19                                                       |
| 6.  | CONSTRUCTION:                                              | Tentative 2019-20                                                                           |
| 7.  | CAPITAL INVESTMENT:                                        | \$500k                                                                                      |
| 8.  | PLANNED SUBSTATION:                                        | NAME - Reaver; TRANS. VOLTAGE - 138 kV; ACREAGE - Approx 4 acres;<br>LOCATION - SW Columbus |
| 9.  | SUPPORTING STRUCTURES:                                     | Overhead                                                                                    |
| 10. | PARTICIPATION WITH OTHER UTILITIES                         | N/A                                                                                         |
| 11. | PURPOSE OF THE PLANNED TRANSMISSION LINE                   | Cut in new AEP-Ohio Distribution station to existing line.                                  |
| 12. | CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION | AEP-Ohio Distribution would have difficulty in continuing to serve area load growth.        |
| 13. | MISCELLANEOUS:                                             | N/A                                                                                         |

PUCO FORM FE-T9  
AEP OHIO  
SPECIFICATION OF PLANNED ELECTRIC TRANSMISSION LINES

Filed May 31, 2018

|     |                                                            |                                                                                             |
|-----|------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| 1.  | LINE NAME AND (PJM NUMBER):                                | McComb-Reaver 138kV (S1806.4)                                                               |
| 2.  | POINTS OF ORIGIN AND TERMINATION                           | McComb, Reaver; INTERMEDIATE STATION - N/A                                                  |
| 3.  | RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS                   | 0.1 mi / 100 ft / single-circuit                                                            |
| 4.  | VOLTAGE: DESIGN / OPERATE                                  | 138kV / 138kV                                                                               |
| 5.  | APPLICATION FOR CERTIFICATE:                               | Construction notice or LON in 2018-19                                                       |
| 6.  | CONSTRUCTION:                                              | Tentative 2019-20                                                                           |
| 7.  | CAPITAL INVESTMENT:                                        | \$500k                                                                                      |
| 8.  | PLANNED SUBSTATION:                                        | NAME - Reaver; TRANS. VOLTAGE - 138 kV; ACREAGE - Approx 4 acres;<br>LOCATION - SW Columbus |
| 9.  | SUPPORTING STRUCTURES:                                     | Overhead                                                                                    |
| 10. | PARTICIPATION WITH OTHER UTILITIES                         | N/A                                                                                         |
| 11. | PURPOSE OF THE PLANNED TRANSMISSION LINE                   | Cut in new AEP-Ohio Distribution station to existing line.                                  |
| 12. | CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION | AEP-Ohio Distribution would have difficulty in continuing to serve area load growth.        |
| 13. | MISCELLANEOUS:                                             | N/A                                                                                         |

PUCO FORM FE-T10  
AEP OHIO  
SUMMARY OF PROPOSED SUBSTATIONS

Filed May 31, 2018

| Substation Name                                    | Voltage(s)<br>(kV) | Type<br>Distribution (D)<br>Transmission (T) | Timing                | Line Association(s)                                                                                                                                                                  | Line<br>Existing or<br>Proposed | Minimum<br>Substation<br>Site Acreage |
|----------------------------------------------------|--------------------|----------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------|
| Berrywood (S1194)                                  | 138 kV/69 kV       | T                                            | Est - 8/2019          | Trent - Delaware 138 kV                                                                                                                                                              | Existing                        | Approx 3<br>acres                     |
| Brice (S1594.2)                                    | 138/13             | D                                            | 2019                  | Brice-Astor & Shannon-Groves-Brice                                                                                                                                                   | Proposed                        | 3                                     |
| Buell (s1125)                                      | 138/12             | D                                            | 2019-20               | South Caldwell - Devola 138                                                                                                                                                          | Proposed                        | 3                                     |
| Dilles Bottom (expansion of existing)<br>(b2753.2) | 138/12             | D                                            | 2019-20               | George Washington - Dilles Bottom 138kV, Dilles Bottom - Holloway 138kV                                                                                                              | Proposed                        | 4                                     |
| Glencoe (expansion of existing) (b2593)            | 138/69             | T                                            | 2019                  | West Bellaire - Glencoe 138kV                                                                                                                                                        | Proposed                        | 4                                     |
| Highland Ridge Switch (s1125)                      | 138                | T                                            | 2020                  | Macksburg - Highland Ridge Switch 138 kV                                                                                                                                             | Proposed                        | Approx 0.2<br>acres                   |
| Lemaster (B2888.2)                                 | 138/12             | D                                            | Estimated<br>6/1/2018 | Poston - Ross 138 kV; Poston - Harrison 138 kV; Poston - Hocking 138 kV; Crooksville - Poston - Strouds<br>Run 138 kV; Corwin - Elk - Poston 138 kV; Dexter - Elliot - Poston 138 kV | Existing                        | Approx 10<br>acres                    |
| Levee (s1133)                                      | 138/12             | D                                            | 2018                  | Mill Creek-Belmont 138kV tie-line (formerly Mill Creek-Willow Island 138kV)                                                                                                          | Existing                        | 3                                     |
| Macksburg (s1125)                                  | 138/12             | D                                            | 2018-19               | South Caldwell - Devola 138                                                                                                                                                          | Proposed                        | 3                                     |
| Mink (S1651.2)                                     | 138/34.5           | D                                            | 2019                  | East Broad Street - Kirk #1                                                                                                                                                          | Proposed                        | 3.5                                   |
| Reaver (S1606.1)                                   | 138/13             | D                                            | 2019                  | Gay Street - Mocomb,                                                                                                                                                                 | Proposed                        | 3                                     |
| Sardinia (s1609)                                   | 138/12             | D                                            | Estimated<br>2021     | Wild Cat - Kenton 138kV, Adams-Seaman -Sardinia 69kV line                                                                                                                            | Existing                        | expand <1<br>acre                     |
| South Olive Switch (s1125)                         | 138                | T                                            | 2018                  | South Caldwell - Macksburg 138 kV                                                                                                                                                    | Proposed                        | Approx 0.2<br>acres                   |

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/28/2018 3:38:37 PM**

**in**

**Case No(s). 18-1182-EL-BLN**

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