

# Hayden Transmission Station Expansion Project



Case No. 20-583-EL-BLN

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

Submitted by:  
Ohio Power Company

March 27, 2020

# LETTER OF NOTIFICATION FOR THE HAYDEN TRANSMISSION STATION EXPANSION PROJECT

## Letter of Notification

### Ohio Power Company's Hayden Transmission Station Expansion Project

**4906-6-05**

Ohio Power Company (the "Company" or "AEP Ohio") provides the following information to the Ohio Power Siting Board ("OPSB") pursuant to 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 Construction Notice.**

The Company proposes the Hayden Station Expansion ("Project"), located in Hilliard, Franklin County, Ohio. The purpose of this Project is to expand the Hayden Station by more than 20 percent to add equipment and infrastructure necessary to satisfy current resiliency, operational performance, safety, and NERC reliability standards. The Project will be constructed on existing Ohio Power Company property. Appendix A shows the location of the Project.

The Project meets the requirements for a Letter of Notification ("LON") because it is within the types of projects defined by (4)(a) of Appendix A to Ohio Adm.Code. 4906-1-01, *Application Requirement Matrix for Electric Power Transmission Lines*:

*4. Constructing additions to existing electric power transmission stations or converting distribution stations to transmission stations where:*

*b. There is a greater than twenty percent expansion of the fenced area.*

The Project has been assigned PUCO Case No. 20-583-EL-BLN

##### **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 Adm.Code 4906-6-05(B)(2) applies only to electric power, gas, and natural gas transmission lines and is not applicable to this station expansion Project. Nonetheless, this Project is necessary to enable the Company to add equipment and infrastructure that will bring the Hayden Station up to current resiliency, safety, operational performance, and NERC reliability standards.

Because this Project results in no operational, modeling, or topology change, the Project will not be included in the PJM Regional Transmission Expansion Plan. PJM is, however, aware of the Project and has been consulted regarding it. This Project is also not included in Form FE-T10 of AEP Ohio's or AEP Ohio Transco's 2019 Long-Term Forecast Reports because Hayden Station is an existing substation. Hayden Station was included as an existing substation in AEP Ohio's 2019 Form FE-T8, on page 70 of 139.

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### **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.**

This Project is located in Hilliard, Franklin County, Ohio. Appendix A shows the location of the Project in relation to existing assets.

### **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.**

There were no other alternatives considered for this Project. Based on the scope of the Project, the minimal change to the existing station fence, and the location of the Project on existing AEP Ohio property, the Project represents the most suitable and least-impactful alternative. Socioeconomic, land use, and ecological information is presented in Section B(10).

### **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.**

The Company informs affected property owners and tenants about its projects through several different mediums. Within seven days of filing this LON, The Company 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, The Company mailed a letter, via first class mail, to affected landowners, tenants, contiguous owners, and any other landowner The Company 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). The Company 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. An electronic copy of the LON will be served to the public library in each political subdivision affected by this proposed Project. Lastly, The Company 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 the third quarter of 2020, and the anticipated in-service date will be approximately June 2021.

### **B(7) Area Map**

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**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.**

Appendix A, Figure 1 provides a topographical map of existing and proposed facilities at 1:24,000, and Figure 2 provides an aerial image showing roads and highways, clearly marked with Project components.

From Columbus, get on I-70 W/I-71 S (0.7 mi). Continue of I-70 W and then take I-270 N to Cemetery Rd in Hilliard (11.2 mi) Then take exit 13B from I-270 N. Follow Britton Pkwy to Hayden Run Rd in Brown Township (5.8 mi) then the location will be on the right.

### **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.**

The Project is located on property owned by the Company. No other property easements, options, or land use agreements are necessary to construct the Project or operate the substation.

### **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.**

Hayden's station operating characteristics will not change as a result of this Project. The Amlin – Cole 138kV transmission line will be adjusted to accommodate the new fence. The adjustment to the Amlin-Cole 138 kV transmission line will be captured in a separate filing with the OPSB.

### **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.**

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 \$8,400,000 with a Class 4 estimate.

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### **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 entirely within the Company's property in Hilliard, Franklin County, Ohio. The Franklin County Auditor lists the land use of this area as "499- Other Commercial Structures". No tree clearing is anticipated to be required for the Project. No environmental or cultural resources are expected to be impacted as a result of this Project.

#### **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 entirely within Ohio Power Company property, with surrounding industrial/commercial and residential facilities, and is noted within the Franklin County Auditor's website as commercial use. The Company leases the land around the existing station for farming. The Company will coordinate with the farmer to construct the Project.

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

**Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological 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.

#### **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.**

Coordination with the State Historic Preservation Office, 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.

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### **B(10)(e) 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 Company has coordinated with USFWS and ODNR regarding special status species within the vicinity of the Project. No impacts are expected to such species as a result of this Project. Copies of the coordination letters are included as Appendix C.

### **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.**

An Ecological Resources Inventory Report was completed by the Company's consultants within the Project Area and is included as Appendix B. There are no streams impacted by the proposed Project. No wetland impacts are expected to occur.

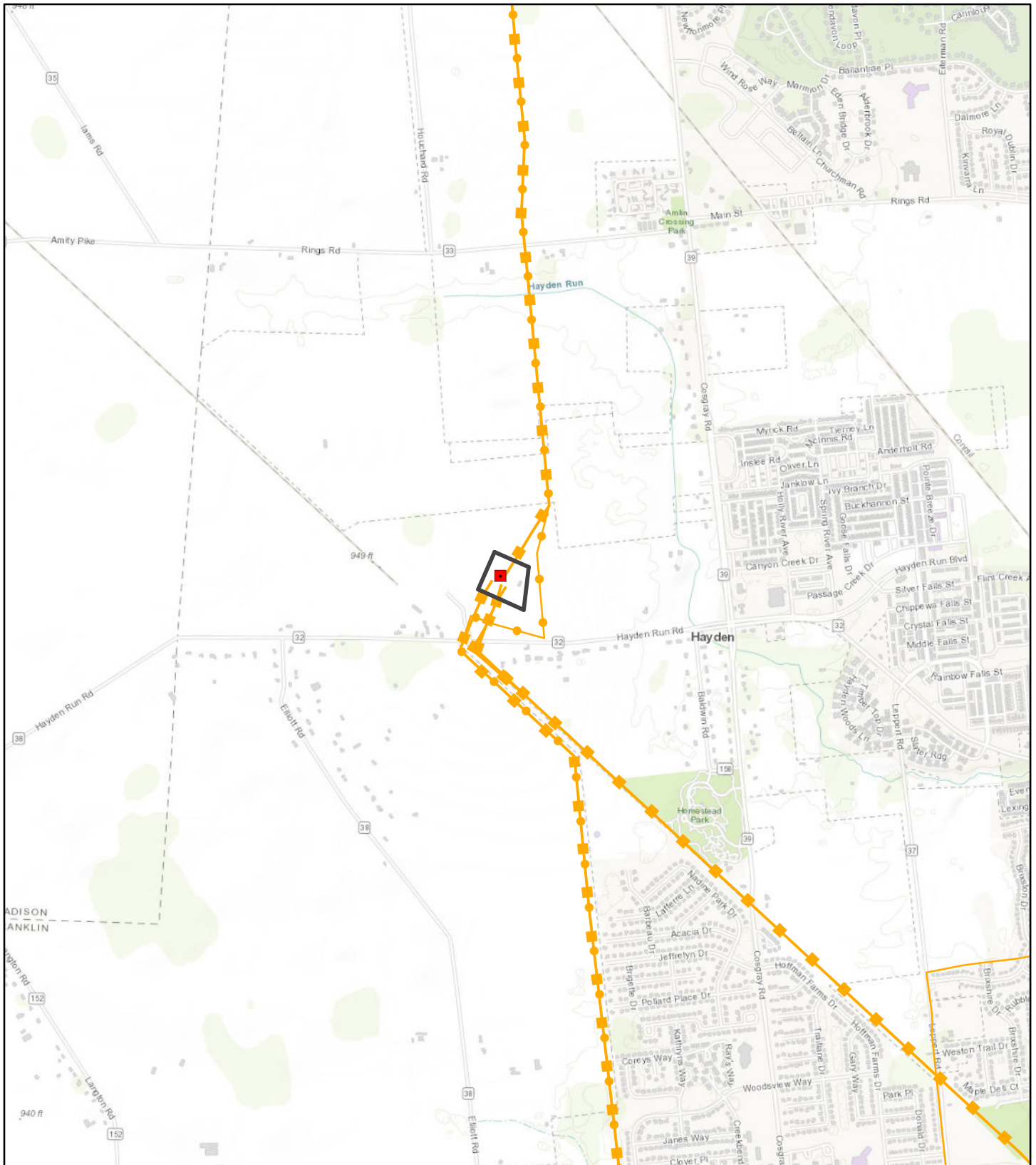
### **B(10)(g) Unusual Conditions**

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

To the best of the Company's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

## APPENDIX A

### Figure 1



## Legend

- Substations
- Existing Lines
- Station Fence

## Hayden Station Site Hardening

March 10, 2020



Figure 1

0 0.125 0.25 0.5  
Miles



LETTER OF NOTIFICATION FOR THE HAYDEN TRANSMISSION STATION EXPANSION PROJECT

**Figure 2**



**Legend**

- Substations
- Existing Lines
- Existing Fence Line
- Proposed Fence

**Hayden Station  
Site Hardening**

March 10, 2020



**Figure 2**



0 75 150 300 Feet

**Appendix B      Wetland Delineation and Stream Assessment Report**



**Hayden Station Expansion and 138 kV  
Transmission Line Extension Project,  
Franklin County, Ohio**

**Ecological Resources Inventory Report**

Prepared for:

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

Prepared by:

Stantec Consulting Services Inc.  
11687 Lebanon Road  
Cincinnati, Ohio 45241

January 31, 2019

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# ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV TRANSMISSION LINE EXTENSION PROJECT

Introduction  
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## 1.0 Introduction

AEP Ohio Transmission Company, Inc. (AEP) is proposing to expand the existing Hayden 345 kV substation (Hayden Station) and relocate associated 138 kV transmission lines in Franklin County, Ohio (Figure 1, Appendix A). The Hayden Station Expansion and 138 kV Transmission Line Project area (the Project area) includes a portion of the existing station pad and adjacent areas where substation expansion, fence installation, and/or transmission line relocation work may occur. The Project is located off Hayden Run Road in Brown Township, Ohio. The Project area was surveyed for wetlands, waterbodies, open water features, upland drainage features, and potential threatened, endangered, and rare species habitat by Stantec Consulting Services Inc. (Stantec) biologists on December 12, 2018. Additionally, the approximate locations of features located up to 50 feet outside of the Project area limits were recorded during the field surveys, where landowner access was permitted. However, no data forms were completed for features that did not extend into the Project area. These features are shown on the Figure 2 map in Appendix A as "approximate" wetlands, streams (waterways), open waters, and upland drainage features.

# ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV TRANSMISSION LINE EXTENSION PROJECT

Methods  
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## 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.

### 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.



# ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results  
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## 3.0 Results

### 3.1 TERRESTRIAL HABITAT

Stantec completed field surveys within the Project area on December 12, 2018, for wetlands, waterbodies, and threatened, endangered or rare species habitats. Figure 2 (Appendix A) shows the upland drainage feature identified within the Project area. Figure 3 (Appendix A) shows the habitats and locations of any identified rare, threatened, or endangered species habitats observed within the Project area. Representative photographs of the vegetation 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).

**Table 1. Vegetation Communities and Land Cover Found within the Hayden Station Expansion and 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>
New Field	Extreme Disturbance/Ruderal Community (dominated by opportunistic invaders and/or native highly tolerant taxa). Dominant plant species included tall fescue ( <i>Schedonorus arundinaceus</i> ), yellow foxtail ( <i>Setaria pumila</i> ), Japanese bristlegrass ( <i>Setaria faberi</i> ), Japanese honeysuckle ( <i>Lonicera japonica</i> ), and Carolina horsenettle ( <i>Solanum carolinense</i> ).	No	0.85
Fallow Agricultural Field	Extreme Disturbance/Ruderal Community (dominated by opportunistic invaders and/or native highly tolerant taxa). Dominant plant species included redroot amaranth ( <i>Amaranthus retroflexus</i> ), yellow foxtail, and annual ragweed ( <i>Ambrosia artemisiifolia</i> ).	No	3.44
Industrial	Extreme Disturbance/Ruderal Community (without vegetation or dominated by opportunistic invaders and/or native highly tolerant taxa).	No	0.04
<b>Total</b>			<b>4.33</b>



# ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV TRANSMISSION LINE EXTENSION PROJECT

Results  
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## **3.2 WETLANDS**

No wetlands were observed within the Project area during the field surveys conducted on December 12, 2018.

## **3.3 STREAMS**

No streams were observed within the Project area during the field surveys conducted on December 12, 2018.

## **3.4 OPEN WATER FEATURES**

No open water features (ponds or lakes) were observed within the Project area during the field surveys conducted on December 12, 2018.

Results  
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3.5 RARE, THREATENED, OR ENDANGERED SPECIES HABITAT

Table 2. Summary of Potential Ohio State-Listed Species within the Hayden Station Expansion and 138 kV Transmission Line Extension Project Area, Franklin County, Ohio

Common Name	Scientific Name	State Listing <sup>1</sup>	Known to Occur Within Franklin County? <sup>2</sup>	Known Within One Mile of Project Area? <sup>3</sup>	Habitat Preference	Habitat Observed in Project Area?	Impact Assessment	ODNR Comments/Recommendations
Amphibians								
Eastern Hellbender	<i>Cryptobranchus alleganiensis alleganiensis</i>	E	Yes	No	In Ohio, this species is found mostly in the unglaciated (south and east) portions of the State. Hellbenders prefer large, swift flowing streams where they hide during the day under large rocks (ODNR 2018b).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
Midland Mud Salamander	<i>Pseudotriton montanus diastictus</i>	T	Yes	No	Muddy springs, slow floodplain streams, and swamps along slow streams; backwater ponds and marshes created by beaver activity (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
Insects								
Regal Fritillary	<i>Speyeria idalia</i>	E	Yes	No	Occurs in tallgrass prairie remnants and other open sites including damp meadows, marshes, wet fields, and pastures (Lotts and Naberhaus 2017).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
Birds								
Upland Sandpiper	<i>Bartramia longicauda</i>	E	No	No	Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (ODNR 2018b). Large areas of grassland/lightly-moderately grazed pasture habitats (≥ 20 acres) are required to be suitable as upland sandpiper nesting habitat (McCormac and Kennedy 2004; NatureServe 2018; USFWS 2001).	No	No suitable nesting habitat (large grasslands/lightly-moderately grazed pasture habitats ≥ 20 acres; McCormac and Kennedy 2004) is present within the Project area. Therefore, no impacts are anticipated.	The project is within the range of the upland sandpiper. 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). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 to July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.
Fish								
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 (ODNR 2018b).	No	No suitable habitat is present 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, 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 2018b).	No	No suitable habitat is present 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, this project is not likely to impact this species.

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Common Name	Scientific Name	State Listing <sup>1</sup>	Known to Occur Within Franklin County? <sup>2</sup>	Known Within One Mile of Project Area? <sup>3</sup>	Habitat Preference	Habitat Observed in Project Area?	Impact Assessment	ODNR Comments/Recommendations
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 2018b).	No	No suitable habitat is present 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, this project is not likely to impact this species.
Scioto Madtom	<i>Noturus trautmani</i>	E	Yes	No	Prefers tail end of riffles over sand and gravel substrate (ODNR 2018b).	No	No suitable habitat is present 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, this project is not likely to impact this species.
Northern Brook Lamprey	<i>Ichthyomyzon fossor</i>	E	No	No	Adult northern brook lampreys are found in clear brooks with fast flowing water and either sand or gravel bottoms. Juveniles or ammocoetes are found in slow moving water buried in soft substrate of medium to large streams. Water sources must be free flowing (free of dams for both life phases (ODNR 2018b).	No	No suitable habitat is present 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, this project is not likely to impact this species.
Tippecanoe Darter	<i>Etheostoma tippecanoe</i>	T	Yes	No	These fish prefer 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 2018b).	No	No suitable habitat is present 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, this project is not likely to impact this species.
Tonguetied Minnow	<i>Exoglossum laurae</i>	T	Yes	No	Habitat 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 is present 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, 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 2018b).	No	No suitable habitat is present 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, this project is not likely to impact this species.
Mussels								
Fanshell	<i>Cyprogenia stegaria</i>	E	Yes	No	Medium to large streams and rivers with moderate to strong current in coarse sand and gravel and depth ranging from shallow to deep (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
Butterfly	<i>Ellipsaria lineolata</i>	E	Yes	No	This mussel prefers stable substrate containing rock, gravel, and sand in swift currents of large rivers (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
Elephant-Ear	<i>Elliptio crassidens crassidens</i>	E	Yes	No	An inhabitant of channels in large creeks to rivers with moderate to swift currents, primarily on sand and limestone or rock substrates (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, 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 is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial

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Common Name	Scientific Name	State Listing <sup>1</sup>	Known to Occur Within Franklin County? <sup>2</sup>	Known Within One Mile of Project Area? <sup>3</sup>	Habitat Preference	Habitat Observed in Project Area?	Impact Assessment	ODNR Comments/Recommendations
								stream, this project is not likely to impact this species.
Northern Riffleshell	<i>Epioblasma torulosa rangiana</i>	E	Yes	No	Habitat includes riffles and firmly packed substrates of fine to coarse gravel. This mussel needs highly oxygenated water (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Snuffbox	<i>Epioblasma triquetra</i>	E	Yes	No	Occurs in medium-sized streams to large rivers, generally on mud, rocky, gravel, or sand substrates in flowing water. This species is often deeply buried in substrate and overlooked by collectors (NatureServe 2018). 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 is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Ebonyshell	<i>Reginaia (Fusconaia) ebena</i>	E	Yes	No	Inhabits large rivers and prefers swift water and stable sand or gravel shoals. Coarse sand and gravel substrate provide the most suitable habitat. It can occur at depths of 10-15 feet with current associated (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
Long-solid	<i>Fusconaia maculata maculata</i>	E	Yes	No	This mussel is found in the gravel substrates of shoals and riffles of large rivers, as well as impounded areas (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Pocketbook	<i>Lampsilis ovata</i>	E	Yes	No	Very generalized in habitat preference, adapting well to both impoundment situations as well as free-flowing, shallow rivers. Usually found in moderate to strong current, it can survive in standing water. The most suitable substrate consists of a mixture of gravel and coarse sand mixed with some silt or mud (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Washboard	<i>Megalonaias nervosa</i>	E	Yes	No	This species is typically a large river species, living in the main channel and in some of the overbank areas of reservoirs, but in some instances, it may also become established in medium-sized and even small rivers. It is found in areas with a slow current with muddy to coarse gravel substrates (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Clubshell	<i>Pleurobema clava</i>	E	Yes	No	The clubshell is found in small to medium rivers, but occasionally is also 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 and Goforth (2001) found the clubshell in gravel/sand substrate, runs having laminar flow (0.06-0.25 m/sec) within small to medium sized streams (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

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Common Name	Scientific Name	State Listing <sup>1</sup>	Known to Occur Within Franklin County? <sup>2</sup>	Known Within One Mile of Project Area? <sup>3</sup>	Habitat Preference	Habitat Observed in Project Area?	Impact Assessment	ODNR Comments/Recommendations
Ohio Pigtoe	<i>Pleurobema cordatum</i>	E	Yes	No	This mussel prefers strong currents of large rivers with substrates of sand and gravel, though is somewhat tolerant of lentic systems (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, 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 is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Wartyback	<i>Quadrula nodulata</i>	E	Yes	No	This species can occur in medium to large rivers at depths of up to 15-18 feet on a sand and mud substrate (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	No comment
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 (NatureServe 2018; 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 is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, 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. Found in sand, gravel, or silt (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Threehorn Wartyback	<i>Obliquaria reflexa</i>	T	Yes	No	This species is typical of large rivers where there is moderately strong current, and a stable substrate composed of gravel, sand, and mud (NatureServe 2018).	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, 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 is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.
Pondhorn	<i>Uniomereus 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	No	No suitable habitat is present within the Project area. Therefore, no impacts are anticipated.	Due to location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

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Results  
January 31, 2019

Common Name	Scientific Name	State Listing <sup>1</sup>	Known to Occur Within Franklin County? <sup>2</sup>	Known Within One Mile of Project Area? <sup>3</sup>	Habitat Preference	Habitat Observed in Project Area?	Impact Assessment	ODNR Comments/Recommendations
					dried up by burying itself deep into the substrate (NatureServe 2018).			
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 2018b). 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 potential hibernacula, suitable roost trees, or foraging habitat was observed within the Project area. Therefore, no impacts to this species are anticipated. If any summer tree clearing is determined necessary, AEP will proceed in accordance with agency requirements.	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 mist net survey be conducted between June 1 and August 15, prior to any cutting. If no tree removal is proposed, this project is not likely to impact this species.
<sup>1</sup> E=Endangered; T=Threatened <sup>2</sup> According to Ohio Department of Natural Resources, State Listed Wildlife Species by County (ODNR 2018a). <sup>3</sup> According to Ohio Natural Heritage Program (Appendix B).								



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Table 3. Summary of Potential Federally-Listed Species within the Hayden Station Expansion and 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? <sup>2</sup>	Habitat Preference	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 2018b). 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 potential hibernacula, suitable roost trees, or foraging habitat was observed within the Project area. Therefore, no impacts to this species are anticipated. If any summer tree clearing is determined necessary, AEP will proceed in accordance with agency requirements.	Should the project site contain trees ≥3 inches dbh, USFWS recommends trees be saved whenever possible. If any caves or abandoned mines may be disturbed, further coordination is requested. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, USFWS recommends that removal of trees ≥3 inches dbh only occur between October 1 and March 31 to avoid adverse effects to this species.
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 2016). 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 potential hibernaculum, suitable roost trees, or foraging habitat was observed within the Project area. Therefore, no impacts to this species are anticipated. If any summer tree clearing is determined necessary, AEP will proceed in accordance with agency requirements.	Should the project site contain trees ≥3 inches dbh, USFWS recommends trees be saved whenever possible. If any caves or abandoned mines may be disturbed, further coordination is requested. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, USFWS recommends that removal of trees ≥3 inches dbh only occur between October 1 and March 31 to avoid adverse effects to this species. Incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule.
Fish							

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Common Name	Scientific Name	Federal Listing <sup>1</sup>	Known to Occur in Franklin County? <sup>2</sup>	Habitat Preference	Habitat Observed in Project Area?	Impact Assessment	USFWS Comments/ Recommendations
Scioto Madtom	<i>Noturus trautmani</i>	E	Yes	Prefers tail end of riffles over sand and gravel substrate (ODNR 2018b).	No	No suitable habitat is present 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 or any other federally listed species.
Mussels							
Clubshell	<i>Pleurobema clava</i>	E	Yes	The clubshell is found in small to medium rivers, but occasionally is also 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 and Goforth (2001) found the clubshell in gravel/sand substrate, runs having laminar flow (0.06-0.25 m/sec) within small to medium sized streams (NatureServe 2018).	No	No suitable habitat is present 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 or any other federally listed species.
Northern Riffleshell	<i>Epioblasma torulosa rangiana</i>	E	Yes	Habitat includes riffles and firmly packed substrates of fine to coarse gravel. This mussel needs highly oxygenated water (NatureServe 2018).	No	No suitable habitat is present 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 or any other federally listed 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 is present 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 or any other federally listed species.



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Results  
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Common Name	Scientific Name	Federal Listing <sup>1</sup>	Known to Occur in Franklin County? <sup>2</sup>	Habitat Preference	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 (NatureServe 2018; 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 is present 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 or any other federally listed species.
Snuffbox	<i>Epioblasma triquetra</i>	E	Yes	Occurs in medium-sized streams to large rivers, generally on mud, rocky, gravel, or sand substrates in flowing water. This species is often deeply buried in substrate and overlooked by collectors (NatureServe 2018). 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 is present 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 or any other federally listed species.
Plants							
Running Buffalo Clover	<i>Trifolium stoloniferum</i>	E	Yes	Running buffalo clover habitat most commonly consists of mesic woodland in partial to filtered sunlight, where there is a pattern of moderate periodic disturbance for a prolonged period, such as mowing, trampling, or grazing. It has also been found in a variety of disturbed woodland habitats, floodplains, streambanks, grazed woodlots, cemeteries, lawns, old logging roads, and jeep trails (USFWS 2015).	No	No suitable habitat is present 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 or any other federally listed species.
<sup>1</sup> E=Endangered; T=Threatened <sup>2</sup> According to USFWS (2018a).							

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## 4.0 Conclusions and Recommendations

Stantec conducted a wetland and waterbodies delineation and a preliminary habitat assessment for threatened, endangered, and rare species within the Project area on December 12, 2018. During the field surveys, no streams, wetlands, or open water features were identified within the Project area. The information provided by Stantec regarding wetland and stream boundaries is based on an analysis of the site conditions present within the Project area at the time of the field work. The delineations were performed by experienced and qualified professionals using regulatory agency-accepted practices and sound professional judgment.

An environmental review/request letter was sent to ODNR Ohio Natural Heritage Program (ONHP) and the ODNR Office of Real Estate (Appendix B). The ONHP review determined that the Project area occurs at or within a one-mile radius of the following areas associated with the Columbus & Franklin Co. Metro Parks: Heritage Trail Park and Homestead Metro Park. Neither of these parks are located within the Project area. In addition to the ONHP review, a response received from the ODNR Office of Real Estate notes that the Project area is within the range of the following state-listed endangered aquatic species: purple cat's paw, clubshell, northern riffleshell, rayed bean, rabbitsfoot, snuffbox, long solid, Ohio pigtoe, pocketbook, washboard, elephant-ear, black sandshell, Scioto madtom, popeye shiner, northern brook lamprey, spotted darter, and shortnose gar. The response also notes that the Project area is within range of the following state-listed threatened aquatic species: threhorn wartyback, pondhorn, fawnsfoot, tonguetied minnow, paddlefish, and Tippecanoe darter. Due to factors such as lack of habitat, project location, and no proposed in-water work in a perennial stream, the ODNR response concludes that the Project will not impact these species.

If suitable Indiana bat roost habitat occurs in 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, ODNR recommends a net survey be conducted between June 1 and August 15, prior to any cutting. If no tree removal is proposed, the ODNR states that the project is not likely to impact this species. No suitable winter hibernacula or suitable roosting habitat was observed in the Project area. Therefore, no impacts to this species area anticipated. AEP will determine if any summer tree clearing is necessary in areas containing suitable roosting habitat and will proceed accordingly.

The ODNR response also states that the project is within range of the upland sandpiper, a state-listed endangered species. Upland sandpiper nesting habitat consists of large areas of grasslands, grazed and ungrazed pastures, hayfields and grasslands established through the Conservation Reserve Program. If suitable nesting habitat will be impacted, construction should be avoided in those habitats during the species' nesting period of April 15 to July 31. If suitable nesting habitat will not be impacted, this project is not likely to impact this species. Due to lack of suitable nesting habitat (large grasslands/lightly – moderately grazed pasture habitats  $\geq$  20 acres in size;

## **ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV TRANSMISSION LINE EXTENSION PROJECT**

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(McCormac and Kennedy 2004)) observed within the Project area, the Project is not likely to impact this species.

The ODNR 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 area does not contain potentially suitable summer roost trees or hibernacula for the Indiana bat or northern long-eared bat. A technical assistance letter was submitted to the USFWS. The USFWS response letter (Appendix B) stated that should the project site contain trees  $\geq 3$  inches dbh, USFWS recommends trees be saved whenever possible. If any caves or abandoned mines may be disturbed, further coordination is requested. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, USFWS recommends that removal of trees  $\geq 3$  inches dbh only occur between October 1 and March 31 to avoid adverse effects to these species. Incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule. If implementation of seasonal tree clearing is not possible, the USFWS recommends summer presence/absence surveys be conducted for the Indiana bat between June 1 and August 15. If seasonal tree clearing is implemented, the USFWS does not anticipate adverse effects to these species (Appendix B).

The USFWS does not anticipate adverse effects to any other federally endangered, threatened, proposed or candidate species due to the project type, size, and location (Appendix B).

Additionally, the USFWS indicated that there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area (Appendix B). The 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.

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## **Appendix A** **Figures**

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







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References

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

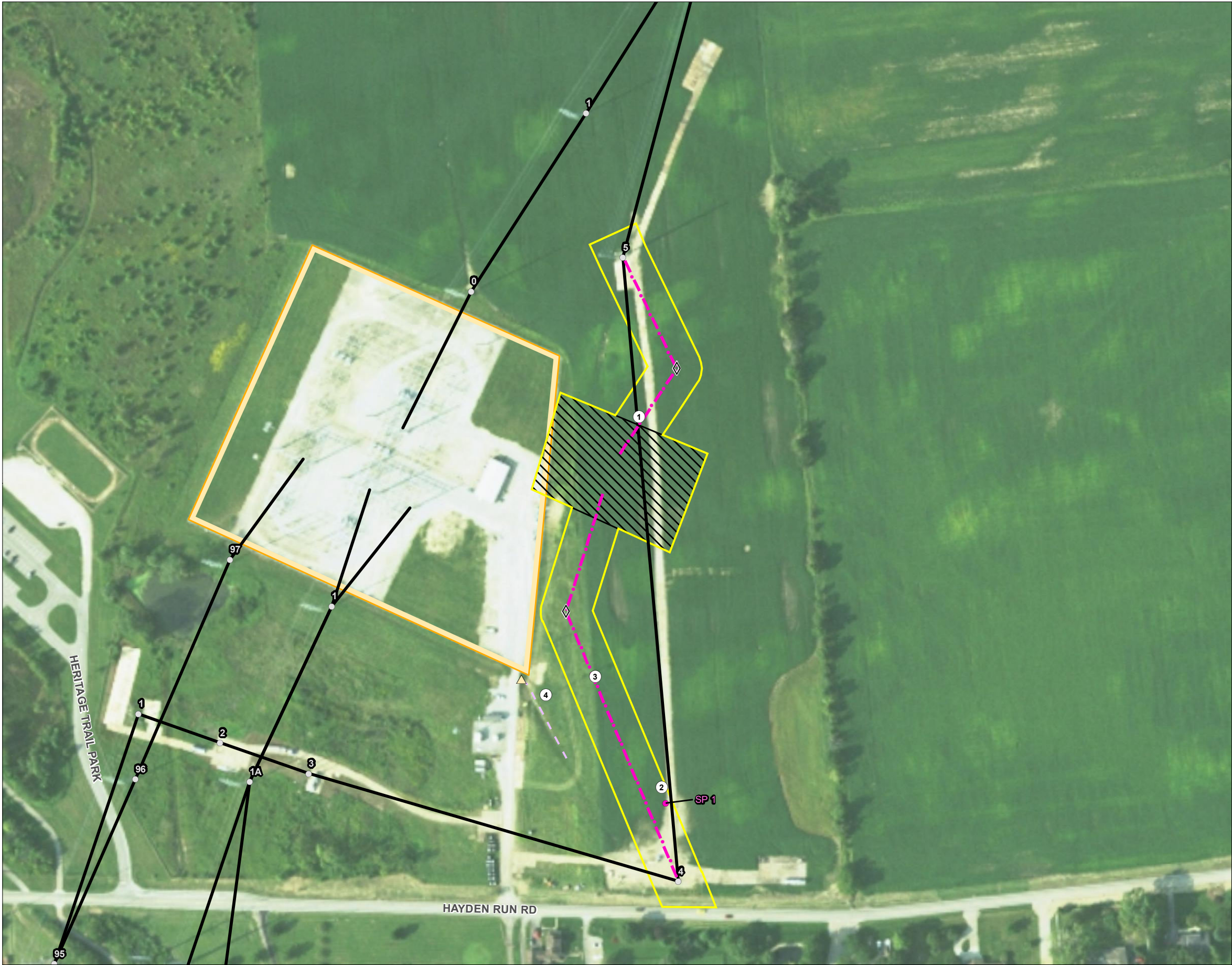


Figure No.  
**2**

Title  
**Wetland and Waterbody  
Delineation Map**

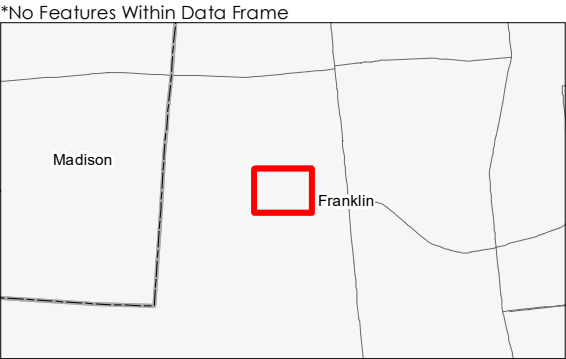
Client/Project  
AEP Ohio Transmission Company, Inc.  
Hayden Station Expansion and  
138 kV Transmission Line Extension Project

Project Location  
Franklin County, Ohio

193705735  
Prepared by JH on 2018-12-20  
Technical Review by NTN on 2019-01-25  
Independent Review by DJG on 2018-01-25



- Legend**
- Existing Structure
  - Proposed Structure
  - Existing Transmission Line
  - Proposed 138 kV Transmission Line Extension
  - Project Area
  - Proposed Station Expansion
  - Hayden Station
  - Existing Culvert
  - Photo Location
  - Wetland Determination Sample Point
  - Approximate Upland Drainage Feature
  - FEMA Flood Hazard Area\*
    - 100-year Flood Zone
    - 100-year Floodway



**Notes**

- Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
- Data Sources Include: Stantec, AEP, USGS, FEMA, NADS, OGRIP
- Orthophotography: 2017 NAIP



**ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV  
TRANSMISSION LINE EXTENSION PROJECT**

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



V:\1937\Activa\193705735\03\_data\ok\_cad\ok\mxd\active\fig1\_habarea.sco.193705735\_fig1Ext.mxd Revised: 2019-01-31 By: JHEIDEMAN

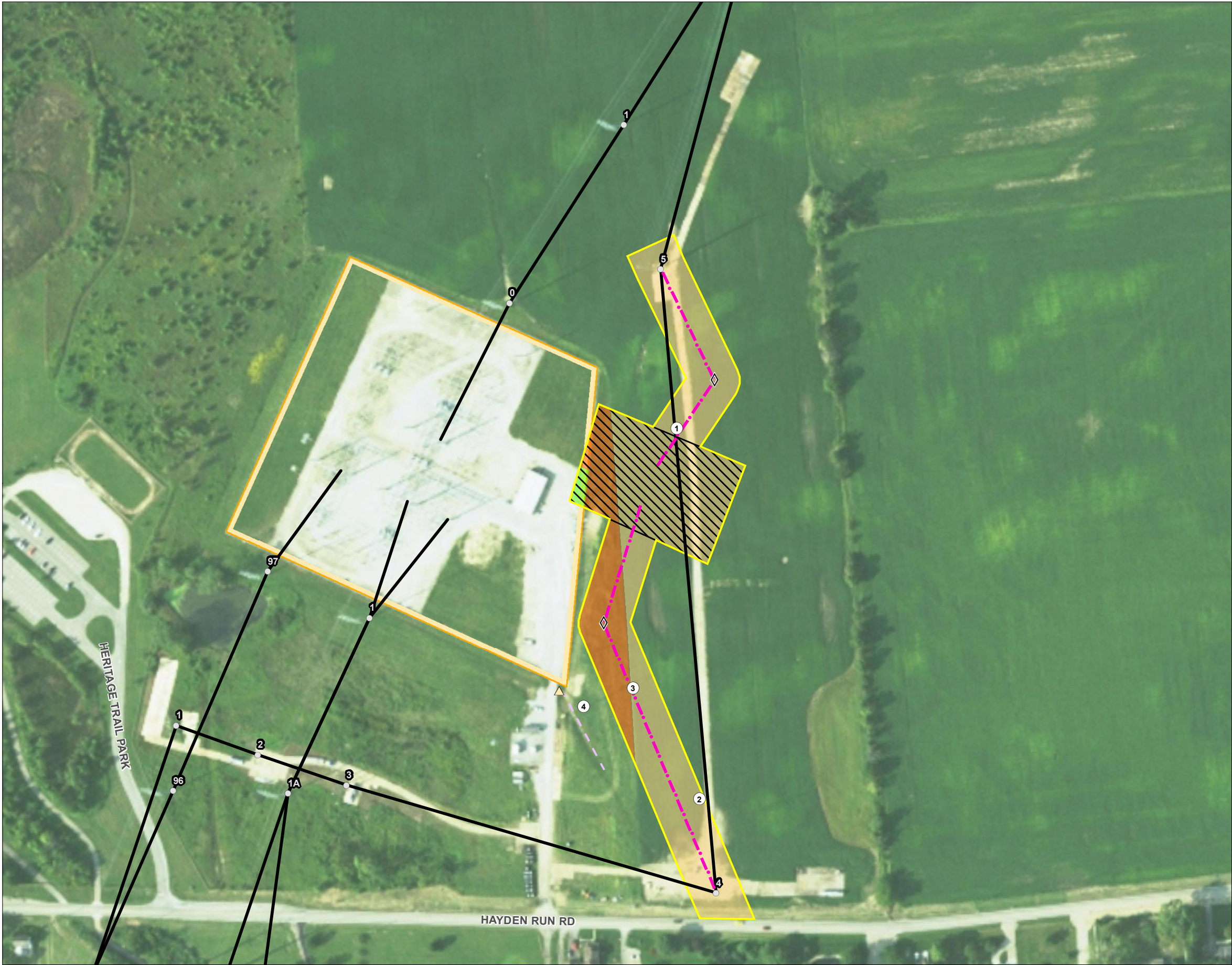


Figure No.  
**3**

Title  
**Habitat Assessment Map**

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Client/Project  
AEP Ohio Transmission Company, Inc.  
Hayden Station Expansion and  
138 kV Transmission Line Extension Project

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Project Location  
Franklin County, Ohio

193705735  
Prepared by JH on 2018-12-21  
Technical Review by NTN on 2019-01-25  
Independent Review by DJG on 2019-01-25

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0 100 200 Feet  
1:2,400 (At original document size of 11x17)

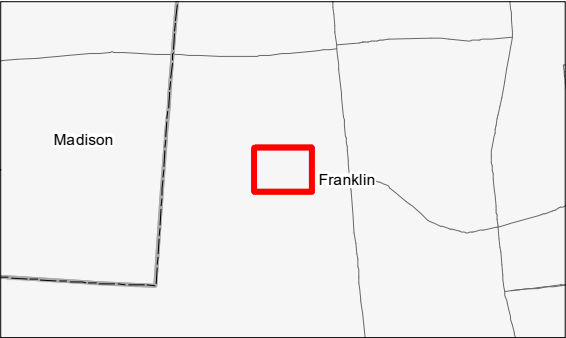
N

Legend

- Existing Structure
- Proposed Structure
- Existing Transmission Line
- Proposed 138 kV Transmission Line Extension
- Project Area
- Proposed Station Expansion
- Hayden Station
- Photo Location
- Approximate Upland Drainage Feature

Habitat Type

- Fallow Agricultural Field
- New Field
- Industrial



Notes

- Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
- Data Sources Include: Stantec, AEP, USGS, NADS, OGRIP
- Orthophotography: 2017 NAIP



**ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV  
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## **Appendix B** **Agency Correspondence**



**Godec, Daniel**

---

**From:** susan\_zimmermann@fws.gov on behalf of Ohio, FW3 <ohio@fws.gov>  
**Sent:** Thursday, November 09, 2017 9:09 AM  
**To:** Godec, Daniel  
**Cc:** nathan.reardon@dnr.state.oh.us; kate.parsons@dnr.state.oh.us  
**Subject:** AEP - Hayden Station Expansion, Franklin County



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-0160

Dear Mr. Godec,

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.

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/nleeb/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,



Dan Everson

Field Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW





# 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 4, 2018

Dan Godec  
Stantec  
1500 Lake Shore Drive Suite 100  
Columbus OH 43204-3800

**Re:** 17-799; Request for Environmental Review, Hayden Station Expansion Project

**Project:** The proposed project involves the expansion of the existing Hayden 345 kV substation and potentially relocate associated transmission lines.

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

Heritage Trail Park – Columbus & Franklin Co. Metro Parks  
Homestead Metro Park – Columbus & Franklin Co. Metro Parks

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

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.

**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, 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. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these 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). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 to July 31. If this type of habitat will not be impacted, 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

**ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV  
TRANSMISSION LINE EXTENSION PROJECT**

References  
January 31, 2019

## **Appendix C** **Representative Photographs**



AEP Ohio Transmission Company, Inc.  
Hayden Station Expansion and 138 kV Transmission Line Extension Project  
Franklin County, Ohio



Photo Location 1. Representative view of fallow agricultural field and new field habitats.  
Photograph taken facing west.



Photo Location 2. Representative view of upland (fallow agricultural field habitat) at wetland determination sample point (SP 1). Photograph taken facing north.





Photo Location 2. Representative view of upland (fallow agricultural field habitat) at wetland determination sample point (SP 1). Photograph taken facing east.



Photo Location 2. Representative view of upland (fallow agricultural field habitat) at wetland determination sample point (SP 1). Photograph taken facing south.





Photo Location 2. Representative view of upland (fallow agricultural field habitat) at wetland determination sample point (SP 1). Photograph taken facing west.



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





Photo Location 3. Representative view of new field habitat and industrial land. Photograph taken facing north.



Photo Location 4. Representative view of upland drainage feature and new field habitat. Photograph taken facing southeast.

**ECOLOGICAL RESOURCES INVENTORY REPORT, HAYDEN STATION EXPANSION AND 138 KV  
TRANSMISSION LINE EXTENSION PROJECT**

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January 31, 2019

## **Appendix D   Data Forms**

### **D.1   WETLAND DETERMINATION DATA FORMS**

Project/Site: <b>Hayden Station Line Extension Project</b>		Stantec Project #: <b>193705735</b>		Date: <b>12/12/18</b>
Applicant: <b>AEP Ohio Transmission Company, Inc.</b>				County: <b>Franklin</b>
Investigator #1: <b>Aaron Kwolek</b>		Investigator #2: <b>Kate Bomar</b>		State: <b>Ohio</b>
Soil Unit: <b>Kokomo silty clay loam, 0 to 2 percent slopes</b>	NWI/WWI Classification: <b>NA</b>			Wetland ID: <b>NA</b>
Landform: <b>Dip</b>	Local Relief: <b>Linear</b>			Sample Point: <b>SP1</b>
Slope (%): <b>&lt;1%</b>	Latitude: <b>40.05997</b>	Longitude: <b>-83.192036</b>	Datum: <b>WGS 1984</b>	Community ID: <b>Upland</b>
Are climatic/hydrologic conditions on the site typical for this time of year? (If no, explain in remarks)				Section: <b>--</b>
Are Vegetation <input type="checkbox"/> , Soil <input type="checkbox"/> , or Hydrology <input type="checkbox"/> significantly disturbed?		Are normal circumstances present?		Township: <b>--</b>
Are Vegetation <input type="checkbox"/> , Soil <input type="checkbox"/> , or Hydrology <input type="checkbox"/> naturally problematic?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Range: <b>--</b> Dir: <b>--</b>

<b>SUMMARY OF FINDINGS</b>			
Hydrophytic Vegetation Present? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Hydric Soils Present? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Wetland Hydrology Present? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<b>Is This Sampling Point Within A Wetland?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Remarks:			

<b>HYDROLOGY</b>		
<b>Wetland Hydrology Indicators</b> (Check here if indicators are not present <input type="checkbox"/> ):		
<u>Primary:</u>		<u>Secondary:</u>
<input type="checkbox"/> A1 - Surface Water	<input type="checkbox"/> B9 - Water-Stained Leaves	<input type="checkbox"/> B6 - Surface Soil Cracks
<input checked="" type="checkbox"/> A2 - High Water Table	<input type="checkbox"/> B13 - Aquatic Fauna	<input type="checkbox"/> B10 - Drainage Patterns
<input type="checkbox"/> A3 - Saturation	<input type="checkbox"/> B14 - True Aquatic Plants	<input type="checkbox"/> C2 - Dry-Season Water Table
<input type="checkbox"/> B1 - Water Marks	<input type="checkbox"/> C1 - Hydrogen Sulfide Odor	<input type="checkbox"/> C8 - Crayfish Burrows
<input type="checkbox"/> B2 - Sediment Deposits	<input type="checkbox"/> C3 - Oxidized Rhizospheres on Living Roots	<input type="checkbox"/> C9 - Saturation Visible on Aerial Imagery
<input type="checkbox"/> B3 - Drift Deposits	<input type="checkbox"/> C4 - Presence of Reduced Iron	<input type="checkbox"/> D1 - Stunted or Stressed Plants
<input type="checkbox"/> B4 - Algal Mat or Crust	<input type="checkbox"/> C6 - Recent Iron Reduction in Tilled Soils	<input checked="" type="checkbox"/> D2 - Geomorphic Position
<input type="checkbox"/> B5 - Iron Deposits	<input type="checkbox"/> C7 - Thin Muck Surface	<input type="checkbox"/> D5 - FAC-Neutral Test
<input type="checkbox"/> B7 - Inundation Visible on Aerial Imagery	<input type="checkbox"/> D9 - Gauge or Well Data	
<input type="checkbox"/> B8 - Sparsely Vegetated Concave Surface	<input type="checkbox"/> Other (Explain in Remarks)	

<b>Field Observations:</b>	
Surface Water Present? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Wetland Hydrology Present?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Water Table Present? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Saturation Present? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Depth: <b>--</b> (in.)	
Depth: <b>6"</b> (in.)	
Depth: <b>6"</b> (in.)	

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:	<b>N/A</b>
Remarks:	

<b>SOILS</b>											
Map Unit Name: <b>Kokomo silty clay loam, 0 to 2 percent slopes</b>											
<b>Profile Description</b> (Describe to the depth needed to document the indicator or confirm the absence of indicators.) (Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered/Coated Sand Grains; Location: PL=Pore Lining, M=Matrix)											
Top Depth	Bottom Depth	Horizon	Matrix			Redox Features				Texture	
			Color (Moist)		%	Color (Moist)		%	Type	Location	(e.g. clay, sand, loam)
<b>0</b>	<b>16</b>	<b>--</b>	<b>10YR</b>	<b>3/1</b>	<b>100</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>silty clay</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

<b>NRCS Hydric Soil Field Indicators</b> (check here if indicators are not present <input checked="" type="checkbox"/> ):			<b>Indicators for Problematic Soils</b> <sup>1</sup>		
<input type="checkbox"/> A1 - Histosol	<input type="checkbox"/> S4 - Sandy Gleyed Matrix	<input type="checkbox"/> A16 - Coast Prairie Redox			
<input type="checkbox"/> A2 - Histic Epipedon	<input type="checkbox"/> S5 - Sandy Redox	<input type="checkbox"/> S7 - Dark Surface			
<input type="checkbox"/> A3 - Black Histic	<input type="checkbox"/> S6 - Stripped Matrix	<input type="checkbox"/> F12 - Iron-Manganese Masses			
<input type="checkbox"/> A4 - Hydrogen Sulfide	<input type="checkbox"/> F1 - Loamy Muck Mineral	<input type="checkbox"/> TF12 - Very Shallow Dark Surface			
<input type="checkbox"/> A5 - Stratified Layers	<input type="checkbox"/> F2 - Loamy Gleyed Matrix	<input type="checkbox"/> Other (Explain in Remarks)			
<input type="checkbox"/> A10 - 2 cm Muck	<input type="checkbox"/> F3 - Depleted Matrix				
<input type="checkbox"/> A11 - Depleted Below Dark Surface	<input type="checkbox"/> F6 - Redox Dark Surface				
<input type="checkbox"/> A12 - Thick Dark Surface	<input type="checkbox"/> F7 - Depleted Dark Surface				
<input type="checkbox"/> S1 - Sandy Muck Mineral	<input type="checkbox"/> F8 - Redox Depressions				
<input type="checkbox"/> S3 - 5 cm Mucky Peat or Peat					

<sup>1</sup> Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

<b>Restrictive Layer</b> (If Observed)	Type: <b>N/A</b>	Depth: <b>N/A</b>	<b>Hydric Soil Present?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Remarks:			



Project/Site: **Hayden Station Line Extension Project**Wetland ID: **NA**Sample Point: **SP1****VEGETATION** (Species identified in all uppercase are non-native species.)

Tree Stratum (Plot size: 30 ft radius)

	<u>Species Name</u>	<u>% Cover</u>	<u>Dominant</u>	<u>Ind. Status</u>
1.	--	--	--	--
2.	--	--	--	--
3.	--	--	--	--
4.	--	--	--	--
5.	--	--	--	--
6.	--	--	--	--
7.	--	--	--	--
8.	--	--	--	--
9.	--	--	--	--
10.	--	--	--	--

Total Cover = **0**

Sapling/Shrub Stratum (Plot size: 15 ft radius)

1.	--	--	--	--
2.	--	--	--	--
3.	--	--	--	--
4.	--	--	--	--
5.	--	--	--	--
6.	--	--	--	--
7.	--	--	--	--
8.	--	--	--	--
9.	--	--	--	--
10.	--	--	--	--

Total Cover = **0**

Herb Stratum (Plot size: 5 ft radius)

1.	<i>Amaranthus retroflexus</i>	<b>1</b>	<b>N</b>	<b>FACU</b>
2.	<i>Schedonorus arundinaceus</i>	<b>25</b>	<b>Y</b>	<b>FACU</b>
3.	<i>Panicum virgatum</i>	<b>5</b>	<b>N</b>	<b>FAC</b>
4.	<i>Symphyotrichum ericoides</i>	<b>2</b>	<b>N</b>	<b>FACU</b>
5.	<i>Abutilon theophrasti</i>	<b>2</b>	<b>N</b>	<b>FACU</b>
6.	<i>Erigeron annuus</i>	<b>15</b>	<b>Y</b>	<b>FACU</b>
7.	--	--	--	--
8.	--	--	--	--
9.	--	--	--	--
10.	--	--	--	--
11.	--	--	--	--
12.	--	--	--	--
13.	--	--	--	--
14.	--	--	--	--
15.	--	--	--	--

Total Cover = **50**

Woody Vine Stratum (Plot size: 30 ft radius)

1.	--	--	--	--
2.	--	--	--	--
3.	--	--	--	--
4.	--	--	--	--
5.	--	--	--	--

Total Cover = **0**

Remarks:

**Dominance Test Worksheet**Number of Dominant Species that are OBL, FACW, or FAC: **0** (A)Total Number of Dominant Species Across All Strata: **2** (B)Percent of Dominant Species That Are OBL, FACW, or FAC: **0%** (A/B)**Prevalence Index Worksheet**

Total % Cover of:

Multiply by:

OBL spp.	<b>0</b>	x 1 =	<b>0</b>
FACW spp.	<b>0</b>	x 2 =	<b>0</b>
FAC spp.	<b>5</b>	x 3 =	<b>15</b>
FACU spp.	<b>45</b>	x 4 =	<b>180</b>
UPL spp.	<b>0</b>	x 5 =	<b>0</b>

Total **50** (A) **195** (B)Prevalence Index = B/A = **3.900****Hydrophytic Vegetation Indicators:**

- |                              |  |  |
|------------------------------|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Rapid Test for Hydrophytic Vegetation      |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Dominance Test is > 50%                    |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Prevalence Index is ≤ 3.0 *                |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Morphological Adaptations (Explain) *      |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Problem Hydrophytic Vegetation (Explain) * |

\* Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Vegetation Strata:****Tree** - Woody plants 3 in. (7.6cm) or more in diameter at breast height (DBH), regardless of height.**Sapling/Shrub** - Woody plants less than 3 in. DBH and greater than 3.28 ft. tall.**Herb** - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft. tall.**Woody Vines** - All woody vines greater than 3.28 ft. in height.**Hydrophytic Vegetation Present** ☐ Yes ☒ No

## **Appendix C      Agency Coordination Letters**



In reply refer to  
2017-FRA-40425

December 12, 2017

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

**RE: Hayden 345kV Substation Safety Fence Project, Brown Township, Franklin County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received on November 13, 2017 regarding the proposed Hayden 345kV Substation Safety Fence Project, Brown Township, 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 (16 U.S.C.470 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for the 22.0 ha (54.4 ac) Hayden 345kV Substation Safety Fence Project in Brown Township, Franklin County, Ohio* by Weller & Associates, Inc. (2017).

A literature review, visual inspection, surface collection, shovel probe excavation, and shovel test unit excavation was completed as part of the investigations. No previously inventoried Ohio Archaeological Inventory (OAI) site is located within the project area. Two (2) Ohio Archaeological Inventory (OAI) sites were identified as part of this survey. OAI#33FR3097 is a prehistoric period isolated find identified during surface collection. OAI#33FR3098 is a historic period scatter identified during surface collection. According to historic atlas records and the artifacts identified, it appears the site dates from the late nineteenth century to the early twentieth century. None of the sites are recommended as eligible for listing in the National Register of Historic Places (NRHP). Based on the information provided, we agree the archaeological sites are not eligible for listing in the NRHP and no further archaeological work is necessary.

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

The following comments pertain to the *History/Architecture Investigations for the 22.0 ha (54.4 ac) Hayden 345kV Substation Safety Fence Project in Brown Township, Franklin County, Ohio* by Weller & Associates, Inc. (2017).

The investigations consisted of a systematic survey of all properties fifty years of age or older that are situated within 1,000' of the proposed project site. A total of eight individual properties of fifty years of age or older were identified within the APE.

RPR Serial No: 1071245, 1071246

Mr. Ryan J. Weller  
Page 2  
December 12, 2017

It is Weller's recommendation that none of these properties are eligible for inclusion in the NRHP due to a lack of associative significance, a loss of integrity, or a lack of character defining features. Our office agrees with Weller's recommendations regarding eligibility.

The results of the architectural investigation identified no historic properties located within the APE that exhibit potential significance for inclusion in the NRHP. 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.

If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,



Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

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

RPR Serial No: 1071245, 1071246

**OHIO HISTORY CONNECTION**

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



**Godec, Daniel**

---

**From:** susan\_zimmermann@fws.gov on behalf of Ohio, FW3 <ohio@fws.gov>  
**Sent:** Thursday, November 09, 2017 9:09 AM  
**To:** Godec, Daniel  
**Cc:** nathan.reardon@dnr.state.oh.us; kate.parsons@dnr.state.oh.us  
**Subject:** AEP - Hayden Station Expansion, Franklin County



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-0160

Dear Mr. Godec,

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.

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,



Dan Everson

Field Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW



# 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 4, 2018

Dan Godec  
Stantec  
1500 Lake Shore Drive Suite 100  
Columbus OH 43204-3800

**Re:** 17-799; Request for Environmental Review, Hayden Station Expansion Project

**Project:** The proposed project involves the expansion of the existing Hayden 345 kV substation and potentially relocate associated transmission lines.

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

Heritage Trail Park – Columbus & Franklin Co. Metro Parks  
Homestead Metro Park – Columbus & Franklin Co. Metro Parks

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

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.

**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, 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. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these 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). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 to July 31. If this type of habitat will not be impacted, 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

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

**Commission of Ohio Docketing Information System on**

**3/27/2020 11:09:06 AM**

**in**

**Case No(s). 20-0583-EL-BLN**

Summary: Notice Letter of Notification Application for the Hayden Transmission Station Expansion Project electronically filed by Tanner Wolffram on behalf of Ohio Power Company