

LETTER OF NOTIFICATION FOR POSTON-ELLIOTT 138K STRUCTURE RELOCATION PROJECT



An **AEP** Company

BOUNDLESS ENERGY™

PUCO Case No. 20-1308-EL-BLN

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

Submitted by:
Ohio Power Company

August 17, 2020

LETTER OF NOTIFICATION FOR POSTON-ELLIOTT 138K STRUCTURE RELOCATION PROJECT

August 2020

LETTER OF NOTIFICATION Ohio Power Company Poston-Elliott 138kV Structure Relocation Project

4906-6-05

Ohio Power Company (the “Company”) is providing the following information to the Ohio Power Siting Board (“OPSB”) in accordance with the accelerated application requirements of Ohio Administrative Code Section 4906-6-05.

4906-6-05(B) General Information

B(1) Project Description

The name of the project and applicant's reference number, names, and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Letter of Notification.

The Company proposes the Poston-Elliott 138 kilovolt (“kV”) Structure Relocation Project (the “Project”) in Athens Township, Athens County, Ohio. The Project consists of relocating Structure 47 approximately 50-feet to the east of its current location to allow the transmission line to enter a different bay within the existing Elliott Substation. The new structure will be a single steel monopole.

The Project will be constructed on a single property currently owned by Ohio University. The Company is currently negotiating the right-of-way (ROW) necessary for the Project. The location of the existing and proposed locations of the facilities (collectively the “Project Area”) are shown on Figure 1 and Figure 2 in Appendix A.

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

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

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

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B(2) Statement of Need

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

Structure #47 along the Poston – Elliott 138 kV line needs to be replaced due to non-jurisdictional work at Elliott station associated with PJM baseline project ID b2792. The existing structure cannot be reconfigured to serve as the new line exit location. The relocation of Structure 47 is required to reduce an outage on the existing Elliott 138/69 kV transformer from 12 weeks to 7 weeks.

The pole replacement will not affect the system topology and, therefore, this Project was not presented to PJM. Because the Project does not create a new transmission line, it was not included in the Company's Long-Term Forecast Report.

B(3) Project Location

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

Figure 1 shows the location of the Project in relation to existing transmission facilities on a United States Geological Survey 1:24,000 topographic quadrangle. Figure 2 identifies the Project components on a 2016 aerial photograph.

B(4) Alternatives Considered

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

The Project is located within and adjacent to existing transmission line ROW on a single property owned by Ohio University. The Project Area and surrounding land uses consist of wooded hills, and agricultural and low-density residential land. The Project does not impact streams or wetlands and minimal tree clearing is required for the centerline and structure adjustment. As new Structure #47 will be placed adjacent to the centerline of the existing Poston-Elliott 138 kV transmission line on the edge of existing transmission ROW, and the Elliott Station is located approximately 125 feet southeast of the transmission structure to be relocated, the resulting alignment represents the most suitable and least impactful Project solution. Therefore, no alternatives were considered as part of this Project.

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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 (7) 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 requirements of OAC Section 4906-6-08(A)(1-6). Further, the Company has mailed (or will mail) a letter, via first class mail, to affected landowners, tenants, contiguous owners and other landowners the Company may approach for an easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with requirements of OAC Section 4906-6-08(B). The Company 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 for this Project. The Company retains right-of-way land agents that discuss Project timelines, construction and restoration activities and convey information to affected owners and tenants throughout the project.

B(6) Construction Schedule

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

The Company anticipates construction of the Project will begin in the fourth quarter of 2020, and the in-service date (completion date) of the Project will be approximately January 2021.

B(7) Area Map

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

Figure 1 included in Appendix A identifies the location of the Project Area on a United States Geological Survey 1:24,000 quadrangle map. Figure 2 in Appendix A is an aerial map of the Project Area. To visit the Project from Columbus, take I-70 E towards Wheeling, West Virginia. Continue on I-70 for approximately 3.2 miles, taking exit 105A for US-33 E/Southeast Expressway toward Lancaster. Continue on US-33 E for 68 miles before merging onto OH-32 W/US-33 E/US-50 W towards Pomeroy/Chillicothe. After 2.0 miles, use the left two lanes to take US-50 W/OH-32 W toward Chillicothe/Cincinnati. Follow for 1.2 miles before turning right onto S Blackburn Road. Follow S Blackburn Road for 1.0 mile to the Elliott Substation.

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

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facility and a list of the additional properties for which such agreements have not been obtained.

Property Parcel Number	Easement Agreement/Option Obtained (Yes/No)
A029050101600	No

B(9) Technical Features

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

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

The transmission line extension construction is estimated to include the following:

Voltage: 138 kV
Conductors: (3) 636kCM ACSR 26/7 "Grosbeak"
Static Wire: (2) 3/8" EHS Steel 7 Strand
Insulators: Polymer deadends
ROW Width: 100-ft
Structure Types: One (1) steel monopole deadend

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:

B(9)(b) Electric and Magnetic Fields

Not applicable. There are no occupied residences or institutions located within 100 feet of the Project.

B(9)(c) Project Costs

The estimated capital cost of the project.

The estimated capital cost of the Project, comprised of applicable tangible and capital costs, is approximately \$330,000 (Class 4).

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

The Project is located within Athens Township, Athens County, Ohio. Land use in the Project Area consists of dispersed residences within a rural landscape and agriculture. Land use of the Project is existing transmission line ROW, open field, and woodlot. The closest residence is located approximately 180 feet west of the existing Structure #46, which is not being removed. Additional residential development gets slightly denser to the southwest of the Project. The Project will require a minor shift along approximately 1,200 feet of ROW from existing Structure #46 to the adjusted location of existing Structure#47 and into Elliott Station. The shift of existing Structure #47 will occur approximately 600 feet away from the nearest residence. The Project will require approximately 1.2 acres of tree clearing.

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.

According to the Athens County Auditor's Office, as of July 15, 2020, the parcel crossed by the Project (Parcel No. A029050101600) does not contain registered Agricultural District Land. Additionally, the Project Area does not contain active agricultural row crop land (Figure 2 in Appendix A).

B(10)(c) Archaeological and Cultural Resources

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

In July 2020, the Company's consultant conducted Phase I Cultural Resource Management Investigations for the Poston-Elliott 138kV Relocation Project in Athens Township, Athens County, Ohio. The fieldwork involved visual inspection and photographic documentation methods of investigation. There were no archaeological resources identified during these investigations and there were no significant architectural resources identified. Correspondence from the State Historic Preservation Office ("SHPO") was received in August 2020 (Appendix B). The SHPO stated that the Project will have no adverse effect on historic properties and that no further archaeological or cultural work is necessary.

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

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of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

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

A Notice of Intent (NOI) will be filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharge under General Permit OHC000005, and the Company will implement and maintain best management practices as outlined in the project-specific Storm Water Pollution Prevention Plan to minimize erosion and sediment to project surface water quality during storm events.

A wetland and stream identification field investigation was completed by the Company's consultant (Appendix C). Two intermittent streams and one ephemeral stream were identified within the immediate vicinity of the Project. No wetlands were identified within the study area. The streams are located within the existing and proposed transmission line ROW and are spanned by the line between Structures 46 and 47 and impacts to aquatic resources are anticipated. Therefore, a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers (USACE) or Individual Clean Water Act Section 401 Water Quality Certification from the Ohio Environmental Protection Agency ("OEPA") are not required.

The Project is not located within a Federal Emergency Management Agency ("FEMA") 100-year floodplain area (FEMA, Flood Insurance Rate Map, Panel 230C, Map Number 39009C0230C, Effective Date December 18, 2009). Therefore, no floodplain permitting is required for the Project.

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

B(10)(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 United States Fish and Wildlife Service ("USFWS") *County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species* (available at <https://www.fws.gov/midwest/endangered/lists/pdf/OhioCtyList29Jan2018.pdf>) document was reviewed to determine the threatened and endangered species known to occur in Athens County. This USFWS publication listed the following species as occurring within Athens County: Indiana bat (*Myotis sodalis*; federally endangered), northern long-eared bat (*Myotis septentrionalis*; federally threatened), fanshell (*Cyprogenia stegaria*; federally endangered), sheepsnose (*Plethobasus cyphus*; federally endangered), pink mucket (*Lampsilis abrupta*; federally endangered), snuffbox (*Epioblasma triquetra*;

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federally endangered), and American burying beetle (*Nicrophorus americanus*; federally endangered). A coordination letter was submitted to the USFWS' Ohio Ecological Services Field Office on July 8, 2020 seeking technical assistance on the Project for potential impacts to threatened or endangered species. In a response received on July 15, 2020, USFWS stated that due to the project type, size and location impacts to federally-listed species or critical habitat are not anticipated.

Several state-listed threatened species, endangered species, and species of concern are listed by the Ohio Department of Natural Resources ("ODNR") (available at <http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/species%20and%20habitats/state-listed%20species/athens.pdf>) as occurring, or potentially occurring in Athens County. These state-listed species are addressed in detail in the Ecological Report (Appendix C). A coordination letter was submitted to the ODNR Division of Wildlife ("DOW") on July 8, 2020 seeking technical assistance for potential impacts to threatened or endangered species in the vicinity of the Project Area. In a response received on August 10, 2020, ODNR-DOW stated that due to the project type, location and size impacts to state-listed species or unique and critical habitats are anticipated. ODNR-DOW recommended that the Company conduct a desktop review of the Project area to identify portals and potential hibernacula for state and federally-listed bat species. The Company's consultant completed a desktop review on August 11, 2020. According to the ODNR's Ohio Mine data, there are no portals or mines within two miles of the Project area. Therefore, it is not anticipated that the Project will impact hibernacula that could be used by federally or state-listed bat species.

Coordination letters from USFWS and ODNR are provided in Appendix B.

B(10)(f) Areas of Ecological Concern

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

Coordination letters were submitted to the USFWS and ODNR requesting a review of the Project and identification of areas of ecological concern. The USFWS response received on July 15, 2020 (Appendix B), indicated there were no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project. The ODNR response received on August 10, 2020 (Appendix B) indicated that according to the Ohio Natural Heritage Database (ODNR), no known unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state natural preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas are located within the Project area.

No properties identified in the National Conservation Easement Database (<http://www.conservationeasement.us>) were identified in the Project Area.

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Poston-Elliott 138kV Structure Relocation Project
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The Project is not located within a Federal Emergency Management Agency (“FEMA”) 100-year floodplain area (FEMA, Flood Insurance Rate Map, Panel 230C, Map Number 39009C0230C, Effective Date December 18, 2009). Therefore, no floodplain permitting is required for the Project.

Wetland and stream delineation field surveys were completed within the Project Area by the Company’s consultant in June 2020. The results of the survey are presented in the Ecological Survey Report included in Appendix C. In general, the habitat encountered within the study area consisted primarily of maintained transmission line ROW consisting of dense scrub vegetation consisting of nuisance and invasive species (wild blackberry [*Rubus allegheniensis*] and autumn olive [*Elaeagnus umbellata*]), as well-forested areas and open fields. The primary habitat found in this Project area is not likely to be preferred or critical habitat for state or federally listed species. Two intermittent streams and one ephemeral stream were identified within the approximately three-acre Study Area. These streams will either be spanned by the Project or avoided all together. Therefore, these resources will not be impacted by the Project.

B(10)(g) Unusual Conditions

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

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

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Appendix A Project Figures



Legend

- ▲ Existing Station
- Proposed 138kV Transmission Line
- Existing 69kV Line
- Existing 138kV Transmission Line

USGS Topographic, Esri ArcGIS Online, Accessed 08/2020.

NAD 1983 State Plane
Ohio South Feet



August 02, 2020

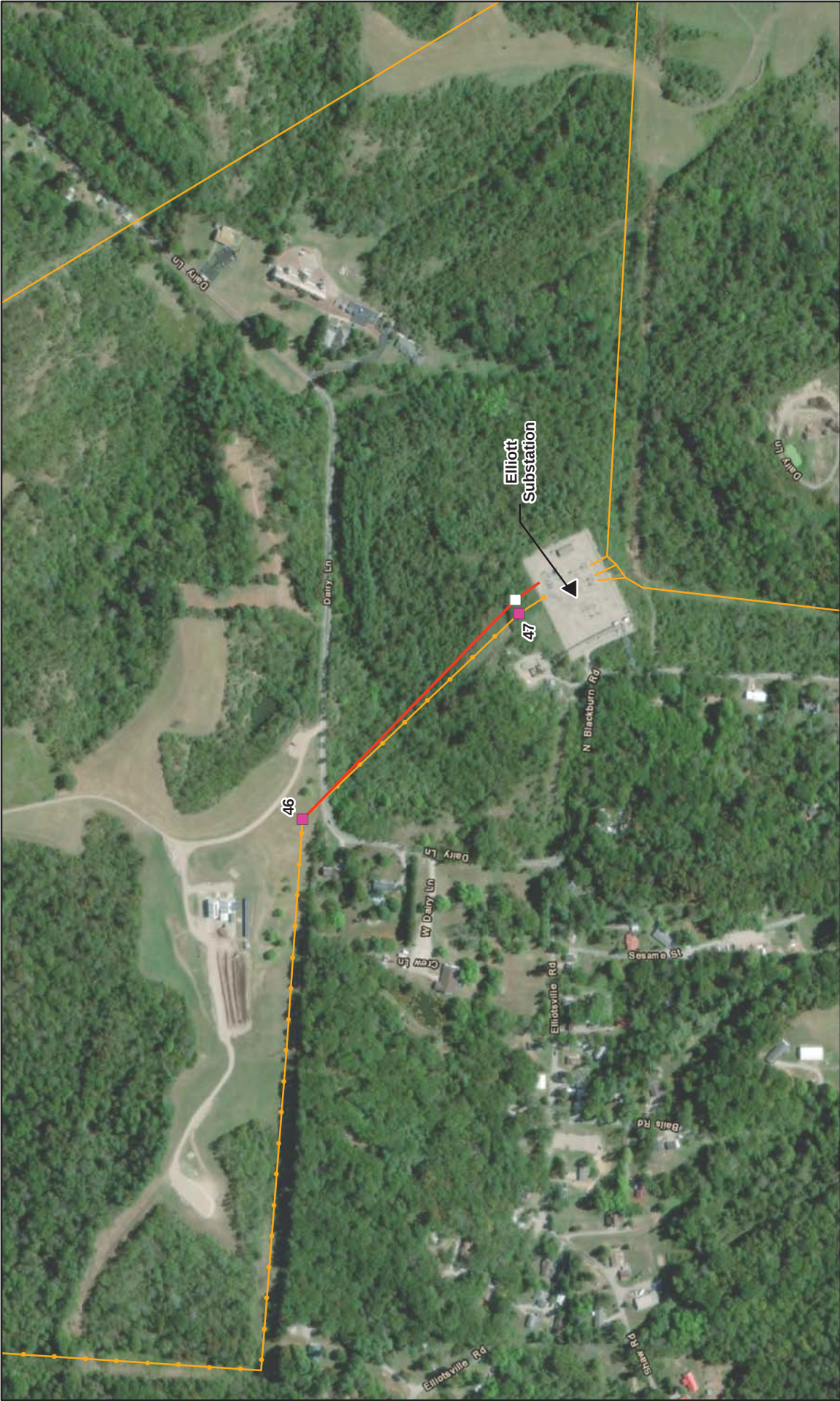


Figure 1
Project Location Map

**AMERICAN
ELECTRIC
POWER**
BOUNDLESS ENERGY

Poston-Elliott 138kV
Structure Relocation Project





Legend

- ▲ Existing Station
- Proposed Structure
- Existing Structure
- Proposed 138kV Transmission Line
- Existing 69kV Line
- Existing 138kV Transmission Line

Esri World Imagery, Maxar, 2016, ArcGIS Online, Accessed 08/2020. Transportation, Esri ArcGIS Online, Accessed 08/2020.

NAD 1983 State Plane
Ohio South Feet



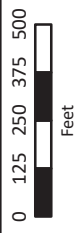
August 02, 2020



Figure 2
Aerial Map

AMERICAN ELECTRIC POWER
BOUNDLESS ENERGY

Poston-Elliott 138kV
Structure Relocation Project



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Appendix B Agency Correspondence



In reply, refer to
2020-ATH-49063

August 11, 2020

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

RE: Poston-Elliott Structure 47 Relocation Project, Athens Township, Athens County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on July 14, 2020 regarding the proposed Poston-Elliott Structure 47 Relocation Project, Athens Township, Athens 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 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Cultural Resource Management Investigations for the Poston-Elliott Structure 47 Relocation Project in Athens Township, Athens County, Ohio* by Weller & Associates, Inc. (2020).

A literature review, visual inspection, shovel probe and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological resources are located within in the project area and no new archaeological sites were identified during survey. Our office agrees no further archaeological survey is necessary.

A literature review and field survey were completed as part of the investigations. Two properties fifty years of age or older were identified within the project area and/or 1,000' study area that may have a direct line of sight to the project. It is Weller's recommendation that the identified properties are not eligible for inclusion in the National Register of Historic Places. Our office agrees with Weller's recommendations of eligibility.

Based on the information provided, we agree that the project as proposed will have no effect on 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, or Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1084853



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
Fax: (614) 267-4764

August 10, 2020

Kristen Vonderwish
GAI Consultants
6000 Town Center Blvd., Suite 300
Canonsburg, PA 15317

Re: 20-694; AEP-Poston Elliott 138 kV Line Structure Relocation Project

Project: The proposed Project involves the relocation of a structure on the Poston-Elliott 138 kV Transmission Line adjacent to the Elliott Station.

Location: The proposed project is located in Athens Township, Athens 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 no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

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 entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the “OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING”. If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31, however, limited summer tree cutting may be acceptable after consultation with DOW (contact Sarah Stankavich, sarah.stankavich@dnr.state.oh.us).

The DOW also recommends that a desktop or field-based habitat assessment is conducted to determine if there are potential hibernaculum(a) present within the project area. Habitat assessments should be conducted in accordance with the current USFWS “Range-wide Indiana Bat Survey Guidelines” and submitted to Sarah Stankavich, sarah.stankavich@dnr.state.oh.us if potential hibernacula are present within .25 miles of the project area. If a potential hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the following listed mussel species.

Federally Endangered

club shell (*Pleurobema clava*)
fanshell (*Cyprogenia stegaria*)
pink mucket (*Lampsilis orbiculata*)
sheepnose (*Plethobasus cyphus*)
snuffbox (*Epioblasma triquetra*)

State Threatened

black sandshell (*Ligumia recta*)
fawnsfoot (*Truncilla donaciformis*)
threehorn wartyback (*Obliquaria reflexa*)

Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the following listed fish species.

State Endangered

spotted darter (*Etheostoma maculatum*)

State Threatened

channel darter (*Percina copelandi*)

paddlefish (*Polyodon spathula*)

river darter (*Percina shumardi*)

The DOW recommends no in-water work in perennial streams from April 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

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

The project is within the range of the eastern spadefoot toad (*Scaphiopus holbrookii*), a state endangered species. This species is found in areas of sandy soils that are associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the midland mud salamander (*Pseudotriton montanus diastictus*), a state threatened species. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

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

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

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

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

From: Ohio, FW3 <ohio@fws.gov>
Sent: Wednesday, July 15, 2020 8:46 AM
To: Kristen Vonderwish; Joshua Noble
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate
Subject: AEP Poston Elliott 138 kV Line Structure Relocation Project, Athens Co

EXTERNAL E-MAIL MESSAGE



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# 03E15000-2020-TA-1817

Dear Ms. Vonderwish,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found 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 breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet 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, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are

present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is 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, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then 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 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. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army 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. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or 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, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew,

Acting Environmental Services Administrator, at (614) 265-6387 or
at mike.pettegrew@dnr.state.oh.us.

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

Sincerely,

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

Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW

LETTER OF NOTIFICATION FOR POSTON-ELLIOTT 138K STRUCTURE RELOCATION PROJECT

Appendix C Ecological Survey Report

Ecological Survey Report

AEP Ohio Transmission Company, Inc.
Poston-Elliott 138 kV Line Structure Relocation Project
Athens County, Ohio

GAI Project Number: R200062.13, Task 008

August 2020



Prepared by: GAI Consultants, Inc.
Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718-2700

Prepared for: AEP Ohio Transmission Company, Inc.
8600 Smiths Mill Road
New Albany, Ohio 43054-7679

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Table 1 Waterbodies Identified Within the Project Study Area

Table 2 ODNR and USFWS Rare, Threatened, and Endangered (RTE) Species and Critical Habitat Review Results

Figure 1 Project Location Map

Figure 2 Resource Location Map

Figure 3 Stream Eligibility Map

Appendix A Photographs

Appendix B Primary Headwater Habitat Evaluation (HHEI) Data Forms

Appendix C Agency Coordination

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1.0 Introduction

GAI Consultants, Inc. (GAI), on behalf of AEP Ohio Transmission Company, Inc. (AEP Ohio Transco), completed an ecological survey for the Poston-Elliott 138 kilovolt (kV) Line Structure Relocation Project (Project) located in Athens County, Ohio (OH). The proposed Project involves the relocation of a structure along the Poston-Elliott 138 kV Transmission Line adjacent to the Elliott Station.

Ecological survey was conducted on June 11, 2020. The Project study area consisted of a 3.0-acre area, as shown in Figure 1.

The Project study area is located within the Coates Run-Hocking River [United States Geological Survey (USGS) Hydrologic Unit Code #050302040804] watershed.

This report details the results of the ecological survey regarding the existence of aquatic resources within the Project area (Figure 2).

2.0 Methods

2.1 Wetlands

The 1987 USACE *Corps of Engineers Wetlands Delineation Manual* (Wetlands Delineation Manual) (USACE, 1987) and the 2012 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountain and Piedmont Region, Version 2.0* (Regional Supplement) (USACE, 2012) describe the methods used to identify and delineate wetlands that fall under the jurisdiction of the USACE. This approach recognizes the three parameters of wetland hydrology, hydrophytic vegetation, and hydric soils to identify and delineate wetland boundaries. In accordance with the Wetlands Delineation Manual and Regional Supplement, GAI completed preliminary data gathering and onsite inspections.

2.1.1 Preliminary Data Gathering

The preliminary data gathering is used to compile and review information that may be helpful in identifying wetlands and/or areas that warrant further inspection during the investigation. The preliminary data gathering includes a review of the following:

- ▶ USGS 7.5-minute topographic mapping for The Plains (USGS, 1977) and Athens (1985), OH (Figure 1);
- ▶ United States Fish and Wildlife Service (USFWS), National Wetlands Inventory (NWI) mapping (USFWS, 2019) (Figure 2);
- ▶ Federal Emergency Management Agency (FEMA), National Flood Hazard Layer (FEMA, 2019) (Figure 2); and
- ▶ United States Department of Agriculture, Natural Resources Conservation Service (USDA-NRCS, 2019) soil mapping (Figure 2).

Topographic mapping is used to identify mapped streams and the overall shape of the landscape in the Project area to determine potential locations for wetlands, such as floodplains and depressions. NWI mapping is used to determine locations where probable wetlands are located based on infrared photography. Soil mapping is reviewed to determine the location and extent of mapped hydric soils that have a high probability of containing wetlands.

2.1.2 Onsite Inspection

The methodology described in the Regional Supplement identifies areas meeting the definition of a wetland by evaluating three parameters: hydrology, vegetation, and soil. During the on-site inspection, GAI staff traversed the Project study area on foot to determine if any indicators of wetlands were present. When indicators of wetlands are observed, an observation point is

established, and a Wetland Determination Data Form (Data Form) is completed to determine if all three wetland indicators are present.

The presence of wetland hydrology is determined by examining the observation point for primary and secondary indicators of wetland hydrology. The presence of any primary indicator signifies the presence of wetland hydrology, or the presence of two or more secondary indicators signifies the presence of wetland hydrology.

Vegetation is characterized by four different strata. This includes trees [woody plants, excluding vines, three inches or more in diameter at breast height (DBH)], saplings/shrubs (woody plants, excluding vines, less than three inches DBH and greater than or equal to 3.28 feet tall), herbs (non-woody plants, regardless of size, and all other plants less than 3.28 feet tall), and woody vines (greater than 3.28 feet tall). In general, trees and woody vines are sampled within a 30-foot radius, saplings and shrubs are sampled within a 15-foot radius, and herbs are sampled within a five-foot radius.

When evaluating an area for the presence of hydrophytes, classification of the indicator status of vegetation is based on *The National Wetland Plant List: 2016 Update of Wetland Ratings* (Lichvar et al., 2016). The list of possible indicator statuses for plants is as follows:

- ▶ Obligate Wetland (OBL) - Obligate Wetland plants occur in standing water or in saturated soils.
- ▶ Facultative Wetland (FACW) - Facultative Wetland plants nearly always occur in areas of prolonged flooding or require standing water or saturated soils but may on rare occasions, occur in non-wetlands.
- ▶ Facultative (FAC) - Facultative plants occur in a variety of habitats, including wetland and mesic to xeric non-wetland habitats but often occur in standing water or saturated soils.
- ▶ Facultative Upland (FACU) - Facultative Upland plants typically occur in xeric or mesic non-wetland habitats but may frequently occur in standing water or saturated soils.
- ▶ Obligate Upland (UPL) - Obligate Upland plants almost never occur in water or saturated soils.

Presence of hydrophytic vegetation is determined by using a Rapid Test, Dominance Test or Prevalence Index. The Rapid Test finds a vegetation community to be hydrophytic if all dominant species are OBL or FACW. Hydrophytic vegetation is considered present based on the Dominance Test if more than 50 percent of dominant species are OBL, FACW, or FAC. The Prevalence Index weighs the total percent of vegetation cover based on the indicator status of each plant. Hydrophytic vegetation is considered present when the Prevalence Index is less than or equal to ($\leq$) 3.0 (USACE, 2012).

To determine the presence of hydric soils, soil data is collected by digging a minimum 16-inch deep soil pit. The soil profile is studied and described, while possible hydric indicators are examined. Soil indicators described in the Wetlands Delineation Manual and Regional Supplement are used to determine the presence of hydric soils. The presence of any of these indicators signifies a hydric soil.

If all three parameters including wetland hydrology, a dominance of hydrophytic vegetation, and hydric soils are identified at a single observation point, the area is determined to be a wetland. Once a wetland is identified, the boundary is delineated.

Wetland boundaries are determined by looking for locations in which one of the three wetland indicators would transition into an upland characteristic. When the transition is identified, a Data Form is completed in the Upland Area. Wetland boundaries are then marked in the field

using pink flagging labeled “WETLAND DELINEATION.” The locations of the flags are recorded using a Global Positioning System (GPS) unit. Each wetland is codified with a unique identifier indicating the feature type and number (e.g., W001).

Wetlands are then classified using the *Classification of Wetlands and Deepwater Habitats of the United States* as modified for NWI Mapping Convention. This system classifies wetlands based on topographic position and vegetation type. Palustrine system wetlands found within the study area are classified as Palustrine Emergent (PEM), Palustrine Scrub-Shrub (PSS), Palustrine Forested (PFO), or Palustrine Unconsolidated Bottom (PUB) based on aerial coverage of the vegetative community across the extent of the wetland boundary (Cowardin et al., 1979).

2.2 Waterbodies

As with wetlands, Sections 404 and Section 401 of the Clean Water Act (CWA) and state regulations protect waterbodies in OH. Generally, waterbodies are defined as environmental features that have defined beds and banks, ordinary high water mark (OHWM), and contain flowing or standing water for at least a portion of the year.

2.2.1 Preliminary Data Gathering

During the preliminary data gathering, the USGS 7.5-minute topographic mapping is examined for the presence of mapped waterbodies including perennial and intermittent streams. In addition, the topographic mapping is used to identify areas likely to contain unmapped waterbodies including ephemeral streams (USGS, 1963, 1978) (Figure 1).

The OEPA 401 Water Quality Certification for the 2017 Nationwide Permits Stream Eligibility Web Map (OEPA, 2017) is used to determine eligibility for coverage under the 401 Water Quality Certification (WQC) for the 2017 Nationwide Permits (NWP). Furthermore, the map is used to identify any ineligible areas that may require a CWA Section 401 individual permit from the OEPA should stream impacts occur within the Project area (OEPA, 2017) (Figure 3).

2.2.2 Onsite Inspection

During the onsite inspection, GAI staff traversed the study area, concurrently with the wetland inspection, whereby waterbodies are identified. Waterbodies are identified based on the morphological and hydrologic characteristics of the channel and the presence of aquatic macroinvertebrates.

When a waterbody is identified, field measurements are collected. The measurements include top of bank width, top of bank depth, pool depth, water depth, OHWM width, and OHWM depth. A detailed description of substrate composition is also recorded. Waterbodies are then delineated using white flagging marked with the GAI stream code (e.g., S001). The tops-of-bank for streams wider than 10 feet are delineated, while the centerline of smaller streams is delineated. The locations of the flags are recorded using a sub-meter-capable hand-held GPS unit.

2.3 RTE Species

GAI conducts a literature review of potential RTE species in the vicinity of the Project study area. Potential habitat for RTE species as a result of the literature review is noted during the ecological survey.

2.3.1 Preliminary Data Gathering

A request for review of the Ohio Natural Heritage Database (ONHD) is submitted to the Ohio Department of Natural Resources (ODNR) to determine if any state-listed Threatened or Endangered species occur within a one-mile radius of the Project area. A request is also

submitted to the USFWS Ohio Ecological Services Field Office to determine if any federally-listed Threatened or Endangered species occur within the vicinity of the Project area.

2.3.2 Onsite Inspection

During the onsite inspection, GAI staff traverse the study area in conjunction with the wetland and waterbody inspections to determine if suitable habitat for state- and/or federally-listed RTE species is present within the study area.

3.0 Results

3.1 Wetlands

3.1.1 Preliminary Data Gathering

Desktop review of available USFWS NWI digital data for the Project revealed no NWI mapped wetlands located within the Project study area (USFWS, 2017).

According to the USDA-NRCS soil mapping, five soil map units are located within the Project study area (Figure 2). None of the soil map units are classified as hydric or known to contain hydric inclusions.

3.1.2 Onsite Inspection

No wetlands were identified within the Project study area.

3.1.3 Regulatory Discussion

The USACE guidance divides waterbodies into three groups: Traditionally Navigable Waters (TNWs), non-navigable Relatively Permanent Waters (RPWs), and non-navigable Non-RPWs. TNWs are waterbodies which have been, are, or may be susceptible to use in interstate commerce, including recreational use of the waterbody. RPWs are waterbodies that flow year-round, or at a minimum seasonally, by exhibiting continuous flow for at least three consecutive months, but are not TNWs. Non-RPWs are waterbodies that do not flow continuously for at least three consecutive months, are not TNWs or RPWs, but typically exhibit characteristic beds, banks, and OHWM (USACE, 2007).

The status of wetlands is determined partly based on the classification of the waterbody that the wetland is associated with, and the degree of that association. Wetlands that abut or are adjacent to TNWs are jurisdictional. Wetlands that abut RPWs are jurisdictional. Wetlands that are adjacent to RPWs and wetlands that abut or are adjacent to Non-RPWs must be subjected to the Significant Nexus Test (SNT) to determine their jurisdictional status. Generally, the USACE considers wetlands that are isolated, meaning that they are not associated with any other surface water feature, as non-jurisdictional; and wetlands that abut or are adjacent to Non-RPWs as needing further examination by the USACE to determine and verify whether they exhibit a significant nexus to waters of the United States. If these wetlands exhibit a significant nexus, they are jurisdictional; if not, they are not subject to USACE jurisdiction (USACE, 2007).

Wetlands that do not exhibit an association with any surface water are categorized as “isolated” under present USACE guidance and policy (USACE, 2007). These wetlands are regulated by the OEPA Division of Surface Water, and may require an Isolated Wetland Permit.

As regulated by Ohio Administrative Code (OAC) rules 3745-1-50 through 3745-1-54, wetlands were also evaluated using the ORAM to determine the appropriate wetland category. Any wetland score that fell within a gray zone between categories was scored one of two ways. Either the wetland was assigned to the higher of the two categories or it was assessed using a non-rapid method to determine its quality (Mack, 2001). The category assigned to a particular

wetland determines the requirement, if any, for additional levels of protection administered by the OEPA.

3.2 Waterbodies

3.2.1 Preliminary Data Gathering

Desktop review of the available USGS topographic mapping revealed no previously mapped stream segments located within the Project study area (Figure 1). Desktop review of OEPA's Stream Eligibility Web Map revealed the Project is located within an eligible area for automatic 401 WQC coverage (Figure 3).

3.2.2 Onsite Inspection

Three stream segments were identified and delineated within the Project study area. Two were classified as intermittent and one was classified as ephemeral. Information on the delineated waterbodies and their classifications can be found in Table 1, and photographs of the identified streams are included in Appendix A.

3.2.3 Regulatory Discussion

As with wetlands, present USACE guidance and policy determines the jurisdictional status of waterbodies identified during the Project. TNWs and RPWs are jurisdictional. Non-RPWs must be subjected to the SNT by USACE to determine their jurisdictional status. If Non-RPWs exhibit a Significant Nexus, as defined in USACE guidance documents, they are jurisdictional. If not, they do not fall under the jurisdiction of the USACE.

Streams are generally defined as environmental features that have defined beds and banks, an OHWM, and contain flowing or standing waters for at least a portion of the year (USACE 2005). Streams were classified as perennial, intermittent, or ephemeral based upon presence of flow, estimated duration of flow, stream bed characteristics, and presence of aquatic biota. The USACE *Jurisdictional Determination Form Instructional Guidebook* (USACE, 2007) was used to determine stream classification and flow status.

As regulated by OAC Chapter 3745-1-24, streams were also assessed according to OEPA guidance using either the HHEI for watersheds less than one square mile in size, or the Qualitative Habitat Evaluation Index (QHEI) for watersheds between one and 20 square miles in size.

3.3 RTE Species

3.3.1 Preliminary Data Gathering

Desktop review of ODNR, Division of Wildlife's Ohio's Listed Species revealed 338 Endangered or Threatened Species of Concern, and Species of Interest located in OH (ODNR, 2017). Eighteen of the state-listed species are considered federally endangered, and four are federally threatened.

A review of the USFWS *County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species for Ohio*, as well as the USFWS Information for Planning and Consultation (IPaC) website revealed three federally Endangered or Threatened species that may occur within the Project study area (USFWS, 2017). The list of species includes the following:

- ▶ Indiana bat (*Myotis sodalis*) - Endangered;
- ▶ Northern long-eared bat (*Myotis septentrionalis*) - Threatened; and
- ▶ American Burying Beetle (*Nicrophorus americanus*).

In addition to the species listed above, there are 10 migratory bird species that may occur within the Project study area.

3.3.2 Onsite Inspection

Potential habitat for RTE species was evaluated within the Project study area. In general, the habitat encountered within the study area consisted of maintained transmission line right-of-way across forested area and open fields. One intermittent and two ephemeral streams were identified within the study area. No wetlands were identified. Due to the lack of sustained hydrology, no habitat was present within the study area suitable for the amphibian, mussel, insect, and fish species listed in Table 2. Therefore, no impact to these species is anticipated. Additionally, the landscape that is present within the study area (maintained transmission line right-of-way across forested area and open fields) is not suitable for the bird, mammal, plant, and reptile species identified in Table 2, and no impact to these species is anticipated. Although habitat for the state-listed bat species is present within the study area, impacts to the species is not anticipated due to the implementation of winter clearing (April 1-September 30) for the Project. Therefore, no impact to federally or state listed species is anticipated to occur as a result of construction of the Project.

Representative photographs of the identified habitat types are included in Appendix A.

3.3.3 Regulatory Discussion

State-listed RTE species fall under the jurisdiction of the ODNR, Division of Wildlife, while federally-listed species are covered under Section 7 of the Endangered Species Act. The Bald and Golden Eagle Protection Act and Migratory Bird Act aim to extend protection to certain bird species that fall under the jurisdiction of the USFWS. Based on the desktop review and onsite inspection, informal consultation with the ODNR and USFWS was initiated to determine if any activities associated with the proposed Project may affect state- and/or federally-listed RTE species. The ODNR and USFWS consultation letters were submitted on July 8, 2020. The USFWS responded to the request for information on July 15, 2020 stating that due to the project type, size, and location, impacts to federally-listed species or critical habitat are not anticipated. This included the Indiana bat, Northern long-eared Bat, and American Burying Beetle. The ODNR responded to the request for information on August 10, 2020 stating that due to the project type, size, and location, impacts to state-listed species or critical habitat are not anticipated. However, ODNR recommended that a desktop review of the Project area should be completed to locate potential portals and hibernacula that may be used by state and federally listed bat species. GAI completed the desktop analysis on August 10, 2020 and no mines or portals were located within two miles of the Project area. Therefore, the Project is not likely to impact hibernacula that could be used by federally or state-listed bat species.

4.0 Conclusions

An ecological survey was conducted within the Project study area on June 11, 2020. One ephemeral stream and two intermittent streams were identified within the Project Study Area. No wetlands were identified within the Project study area. Due to the habitat types present within the study area, coupled with the responses from the USFWS and ODNR, no impact to federally or state listed species is anticipated to occur as a result of construction of the Project.

Summaries of the delineated streams are provided in Table 1, and a map of their locations is depicted on Figure 2. Representative photographs of the Study Area and Resources are included in Appendix A. HHEI Data Forms are provided in Appendix B.

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United States Geological Survey. 1977. The Plains, Ohio 7.5-Minute Topographic Quadrangle (1:24,000).

TABLES

Table 1
Waterbodies Identified Within the Project Study Area

Stream I.D. ¹	Waterbody Name	OEPA WQ Designation ²	OEPA Stream Eligibility ³	Stream Type	USACE Classification ⁴	HHEI Score ⁵	PHWH Class ³	QHEI Score ⁶	Bank Width ⁷ (feet)	OHWM Width (feet)	OHWM Depth (inches)	Stream Length ⁸ (feet)	Latitude ⁹	Longitude ⁹	Figure 2 (sheet)
S001	UNT to Dairy Run	-	Eligible	Ephemeral	Non-RPW	19	1	-	3	2.5	4	29.94	39.312617	-82.119080	1
S002	UNT to Dairy Run	-	Eligible	Intermittent	RPW	40	2	-	3	3.0	4	229.32	39.313682	-82.120645	1
S003	UNT to Dairy Run	-	Eligible	Intermittent	RPW	34	2	-	4	3.5	4	150.18	39.314110	-82.121330	1

Notes:

- GAI map designation.
- As defined by OAC Chapter 3745-1 Water Quality Standards. Water use designations and statewide criteria (OAC 3745-1-06). http://www.epa.ohio.gov/dsw/rules/3745_1.aspx.
- As defined by the 401 WQC conditions for stream eligibility coverage under the 2017 NWP program. Streams located in Possibly Eligible areas are eligible for coverage if the pH is < 6.5 or stream flow is ephemeral. Streams located in Possibly Eligible areas are also eligible for coverage if the HHEI score is < 50, or if the HHEI score is between 50-69 and substrate composition is ≤ 10 percent coarse types (includes cumulative percentage of bedrock, boulders, boulder slabs, and cobble).
- Jurisdictional status is the opinion of GAI and must be confirmed by USACE and state agencies through the JD process. RPW - Relatively Permanent Waters.
- Scoring for OEPA Headwater Habitat Evaluation Index (HHEI) Primary Headwater Habitats (PHWH). Class I = 0 - 29.9 and include "normally dry channels with little or no aquatic life present"; Class II = 30 - 69.9 and are equivalent to "warm water habitat"; Class III = 70 - 100 and typically have perennial flow with cool-cold water adapted native fauna.
- Narrative rating for headwater streams using the OEPA Qualitative Habitat Evaluation Index (QHEI). Excellent = ≥ 70; Good = 55 - 60; Fair = 43 - 54; Poor = 30 - 42; Very Poor = < 30.
- Width in feet from tops of stream bank.
- Total stream length (in feet) located within the Project study area.
- North American Datum, 1983.

Table 2
ODNR and USFWS RTE Species and Critical Habitat Review Results

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/ Species Anticipated?	Restricted Construction Dates
Amphibians						
Eastern Cricket Frog	<i>Acris crepitans</i>	Weed-choked permanent ponds and streams	SC	No	No; Known habitat types are not present within the Project area	-
Eastern Hellbender	<i>Cryptobranchus alleganiensis</i>	Flooded agricultural fields or other water-holding depressions, underground burrows	E, FSC	No	No; Known habitat types are not present within the Project area	-
Eastern Spadefoot	<i>Scaphiopus holbrookii</i>	Areas of sandy soils associated with river valleys. Flooded agricultural fields or other water-holding depressions, underground burrows	E	No	No; Known habitat types are not present within the Project area	
Four-toed Salamander	<i>Hemidactylium scutatum</i>	Boggy woodland ponds and swamps; hides beneath logs, rocks, slabs of bark, and leaves	SC	No	No; Known habitat types are not present within the Project area	-
Midland Mud Salamander	<i>Pseudotriton montanus diastictus</i>	Muddy areas under large, flat stones	T	No	No; Known habitat types are not present within the Project area	-
Bats						
Big Brown Bat	<i>Eptesicus fuscus</i>	Roost sites can be trees, caves, mines, and buildings	SC	Yes	Yes; Avoided with winter tree clearing	April 1 to September 30
Indiana Bat	<i>Myotis sodalis</i>	Trees greater than three inches DBH	E, FE	Yes	Yes; Avoided with winter tree clearing	April 1 to September 30
Little Brown Bat	<i>Myotis lucifugus</i>	Roost sites can be trees, rock crevices, caves, mines, and buildings	SC	Yes	Yes; Avoided with winter tree clearing	April 1 to September 30
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Roost sites can be trees, caves, and mines	SC, FT	Yes	Yes; Avoided with winter tree clearing	April 1 to September 30
Red Bat	<i>Lasiurus borealis</i>	Roost sites can be trees, shrubs, and clusters of herbaceous plants	SC	Yes	Yes; Avoided with winter tree clearing	April 1 to September 30
Silver-haired Bat	<i>Lasiorycteris noctivagans</i>	Roost sites can be trees, rock crevices, caves, and buildings	SC	Yes	Yes; Avoided with winter tree clearing	April 1 to September 30

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Birds						
American Coot	<i>Fulica americana</i>	Shallows of freshwater lakes, ponds, or marshes	SC	No	No; Known habitat types are not present within the Project area	-
Barn Owl	<i>Tyto alba</i>	Old buildings, barns, silos or chimneys, and occasionally hollow trees; Dependent on open grassland for hunting prey	T	No	No; Known habitat types are not present within the Project area	-
Bewick's Wren	<i>Thryomanes bewickii</i>	Thickets, underbrush, and gardens. Mainly bushy areas around the edges of woods	EX	No	No; Known habitat types are not present within the Project area	-
Black-billed Cuckoo	<i>Coccyzus erythrophthalmus</i>	Woodlands, but prefers young forests and dense, scruffy thickets	SC	Yes	No; Impacts are not anticipated	-
Blue-headed Vireo	<i>Vireo solitarius</i>	Wide variety of woodlands. Breeders prefer hemlock trees	SI	No	No; Known habitat types are not present within the Project area	-
Brown Creeper	<i>Certhia americana</i>	Woodlands, groves, and shade trees. Breeds in mature forests, will utilize any habitat with at least a few large trees along migration routes	SI	No	No; Known habitat types are not present within the Project area	-
Canada Warbler	<i>Cardellina canadensis</i>	Forest undergrowth and shady thickets. Breeds in mature hardwoods of extensive forests and streamside thickets	SI	No	No; Known habitat types are not present within the Project area	-
Cerulean Warbler	<i>Setophaga cerulea</i>	Large deciduous wooded tracts of at least 50 to 75 acres. Utilizes both interiors and edges of woodlands	SC	No	No; Known habitat types are not present within the Project area	-
Common Nighthawk	<i>Chordeiles minor</i>	Various, can be found in cities and towns as well as logged forest, woodland clearings, prairies, plains, sagebrush, grasslands, open forests, and rock outcrops	SC	No	No; Known habitat types are not present within the Project area	-
Dark-eyed Junco	<i>Junco hyemalis</i>	Hemlock gorges in the extreme northeastern corner of Ohio	SI	No	No; Known habitat types are not present within the Project area	-
Eastern Whip-poor-will	<i>Antrostomus vociferus</i>	Open, deciduous woods and forages over open fields and brushy areas	SC	No	No; Known habitat types are not present within the Project area	-

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Birds (continued)						
Grasshopper Sparrow	<i>Ammodramus</i> <i>savannarum</i>	Dry upland habitats. Prefers tall-grass habitats such as hayfields, lightly grazed pastures, reclaimed strip mines, and fields bordering airports. Can also be found in clover and alfalfa hayfields and fallow fields with interspersions of weeds and grasses	SC	No	No; Known habitat types are not present within the Project area	-
Henslow's Sparrow	<i>Ammodramus</i> <i>henslowii</i>	Large contiguous blocks of grassland habitat	SC	No	No; Known habitat types are not present within the Project area	-
Hermit Thrush	<i>Catharus</i> <i>guttatus</i>	Conifer or mixed woods, thickets, and parks. Breeds in spruce woods, sphagnum bogs, dry pine woods, wooded canyons, second growth forests, mountain forests of spruce and fir. Migrates and winters in any kind of woodland	SI	No	No; Known habitat types are not present within the Project area	-
Least Flycatcher	<i>Empidonax</i> <i>minimus</i>	Open woods, aspen groves, orchards, and shade trees. Breeds in deciduous or mixed woodlands. Prefers clearings or edges but also utilizes interior of dry woods	SI	No	No; Known habitat types are not present within the Project area	-
Magnolia Warbler	<i>Setophaga</i> <i>magnolia</i>	Large hemlock gorges. Breeds in boreal, coniferous forests, typically spruce-dominated woodlands	SI	No	No; Known habitat types are not present within the Project area	-
Nashville Warbler	<i>Oreothlypis</i> <i>ruficapilla</i>	Open woodlands, often younger successional forests with brushy understory and along bog margins	SI	No	No; Known habitat types are not present within the Project area	-
Northern Bobwhite	<i>Colinus</i> <i>virginianus</i>	Forest edges and open grasslands. Agricultural fields, grasslands, open pine or pine-hardwood forests, and grass-brush rangelands	SC	No	No; Known habitat types are not present within the Project area	-
Northern Saw-whet Owl	<i>Aegolius</i> <i>acadicus</i>	Various woodland types, especially coniferous forests. Sometimes inhabits evergreen thickets in suburban and rural environments	SI	No	No; Known habitat types are not present within the Project area	-
Northern Waterthrush	<i>Parkesia</i> <i>noveboracensis</i>	Wooded swamps, bogs, and thickets bordering wetlands. May nest along streams with bushy or shrubby borders	SI	No	No; Known habitat types are not present within the Project area	-

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Birds (continued)						
Prothonotary Warbler	<i>Protonotaria citrea</i>	Flooded bottomland forests, wooded swamps, and forests near lakes or streams	SC	No	No; Known habitat types are not present within the Project area	-
Red-headed Woodpecker	<i>Melanerpes erythrocephalus</i>	Open deciduous woodlands, river bottoms, burned or recently cleared areas, swamps, orchards, parks, farmland, grasslands with scattered trees, forest edges, and roadsides	SC	No	No; Known habitat types are not present within the Project area	-
Ruffed Grouse	<i>Bonasa umbellus</i>	Mixed species stands of hardwood shrubs, saplings, and brush-vine tangles; moist areas with dense clumps of shrubs and interspersed herbaceous growth; and young forest stands of mixed hardwoods	SC	No	No; Known habitat types are not present within the Project area	-
Sharp-shinned Hawk	<i>Accipiter striatus</i>	Forest edges and interior. Prefer dense forests for breeding but utilize more open forests in the winter. Occasionally in suburban areas with bird feeders.	SC	No	No; Known habitat types are not present within the Project area	-
Veery	<i>Catharus fuscescens</i>	Breeds in dense, damp, mostly deciduous woodlands, often near rivers, streams, and swampy areas. Prefers disturbed forests with dense understory. Favors forest edges and second-growth woodlands during migration	SI	No	No; Known habitat types are not present within the Project area	-
Vesper Sparrow	<i>Pooecetes gramineus</i>	Open areas with short, sparse grass and scattered shrubs including old fields, pastures, weedy fence lines and roadsides, hayfields, and native grasslands	SC	No	No; Known habitat types are not present within the Project area	-
Insects						
Blue Corporal	<i>Ladona deplanata</i>	Still, infertile waters of sandy-bottomed ponds, lakes and pits. Woodland edges near ponds	E	No	No; Known habitat types are not present within the Project area	-
Marsh Bluet	<i>Enallagma ebrium</i>	Vegetated open ponds	T	No	No; Known habitat types are not present within the Project area	-
(none)	<i>Fagittana littora</i>	Unforested wetlands such as coastal bogs, shrubs, swamps, and marshes	T	No	No; Known habitat types are not present within the Project area	-

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Birds (continued)						
American Burying Beetle	<i>Nicrophorus americanus</i>	Thrive in areas with an abundance of carrion and have been found in grasslands, scrublands and forest edges	FE	Yes	No; Impacts are not anticipated	-
Fish						
Spotted Darter	<i>Etheostoma maculatum</i>	Deep swift riffles of large rivers, around cobbles or boulders	E	No	No; Known habitat types are not present within the Project area	-
Channel Darter	<i>Percina copelandi</i>	Large, coarse sand or fine gravel bars in large rivers	T	No	No; Known habitat types are not present within the Project area	-
River Darter	<i>Percina shumardi</i>	Very large rivers, typically in areas of swift current. Found over a gravel or rocky bottom in depths of three feet or more	T	No	No; Known habitat types are not present within the Project area	-
Paddlefish	<i>Polyodon spathula</i>	Found in the Ohio river and up to the first dam on large tributaries. Prefer sluggish pools and backwater areas	T	No	No; Known habitat types are not present within the Project area	-
Mammals						
Badger	<i>Taxidea taxus</i>	Grasslands, prefers those with short grasses such as fields or pastures	SC	No	No; Known habitat types are not present within the Project area	-
Black Bear	<i>Ursus americanus</i>	Heavily wooded habitats, ranging from swamps and wetlands to dry upland hardwood and coniferous forests. Prefers wooded cover with a dense understory	E	Yes	No; Impacts are not anticipated	-
Common Gray Fox	<i>Urocyon cinereoargenteus</i>	Wooded areas and partially open brush land	SC	No	No; Known habitat types are not present within the Project area	-
Deer Mouse	<i>Peromyscus maniculatus</i>	Forests, grasslands, brushlands, agricultural fields, and deserts	SC	Yes	No; Impacts are not anticipated	-
Pygmy Shrew	<i>Sorex hoyi</i>	Variety of habitats including open areas, swamps, grassy clearings, and floodplains	SC	No	No; Known habitat types are not present within the Project area	-
Smoky Shrew	<i>Sorex fumeus</i>	Leaf litter of birch and hemlock forests	SC	No	No; Known habitat types are not present within the Project area	-
Southern Bog Lemming	<i>Synaptomys cooperi</i>	Low, damp bogs and meadows with heavy vegetation growth	SC	No	No; Known habitat types are not present within the Project area	-

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Mammals (continued)						
Woodland Vole	<i>Microtus pinetorum</i>	Eastern deciduous forests, typically live on forest floor in thick layers of leaves and loose soil	SC	Yes	No; Impacts are not anticipated	-
Mussels						
Clubshell	<i>Pleurobema clava</i>	Prefers clean, loose sand and gravel in medium to small rivers and streams	E, FE	No	No; Known habitat types are not present within the Project area	-
Creek Heelsplitter	<i>Lasmigona compressa</i>	Headwaters of small or medium rivers in fine gravel or sand	SC	No	No; Known habitat types are not present within the Project area	-
Deertoe	<i>Truncilla truncata</i>	Firm sand or gravel substrates in rivers and lakes with a moderately swift current. Occasionally seen in smaller streams	SC	No	No; Known habitat types are not present within the Project area	-
Fawnsfoot	<i>Truncilla donaciformis</i>	Small to large rivers and lakes with firm gravel or sand substrates	T	No	No; Known habitat types are not present within the Project area	-
Mucket	<i>Actinonaias ligamentina</i>	Medium to large rivers with coarse sand and gravel	EX	No	No; Known habitat types are not present within the Project area	-
Round Pigtoe	<i>Pleurobema sintoxia</i>	Medium to large rivers, occasionally in small rivers. Prefers fast current areas dominated by coarse sand and gravel substrates. Waters three to 20 feet deep	SC	No	No; Known habitat types are not present within the Project area	-
Threethorn Wartyback	<i>Obliquaria reflexa</i>	Medium to large rivers, with slackwater conditions to swift currents and gravel to muddy sand	T	No	No; Known habitat types are not present within the Project area	-
Reptiles						
Eastern Box Turtle	<i>Terrapene carolina</i>	Various woodlands, typically found beneath rotting logs, decaying leaves, and other plant debris	SC	Yes	No; Impacts are not anticipated	-
Eastern Hognose Snake	<i>Heterodon platirhinos</i>	Woodlands with sandy soils, fields, farmland and coastal areas	SC	No	No; Known habitat types are not present within the Project area	-
Eastern Smooth Earthsnake	<i>Virginia valeriae</i>	Damp, deciduous forests, wooded residential areas, and moist, rocky hillsides.	SC	No	No; Known habitat types are not present within the Project area	-

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Reptiles (continued)						
Northern Rough Greensnake	<i>Ophreodrys aestivus</i>	Blackberry bushes, grapevines, shrubs, roadside ditches, open grassy meadows, and marshy grass	SC	Yes	No; Impacts are not anticipated	-
Timber Rattlesnake	<i>Crotalus horridus</i>	Variety of terrestrial habitat including lowland cane thickets, high areas near swamps and river floodplains, hardwood and pine forests, mountainous areas, and rural habitats in farming areas	E	No	No; Known habitat types are not present within the Project area	-
Plants						
Bradley's Spleenwort	<i>Asplenium bradleyi</i>	Exposed, barren situations, often in full sun, on acidic rocks; crevices, ledges, and cliff faces	E	No	No; Known habitat types are not present within the Project area	-
Carolina Thistle	<i>Cirsium carolinianum</i>	Forest openings, bluffs, roadsides, usually on acidic substrates	T	No	No; Known habitat types are not present within the Project area	-
Dotted Ramalina	<i>Ramalina farinacea</i>	Conifer forests that frequently include a hardwood component	E	No	No; Known habitat types are not present within the Project area	-
Downy White Beard-tongue	<i>Penstemon pallidus</i>	Dry or rocky open woods, glades, sandy soils on prairies, bluffs, rocky cliffs, abandoned fields and along railroads	P	No	No; Known habitat types are not present within the Project area	-
Flattened Sedge	<i>Carex complanata</i>	Dry to moist, often sandy, places: upland or low woods, pinelands, clearings, fields, old fields, meadows, ditches	T	No	No; Known habitat types are not present within the Project area	-
Golden-knees	<i>Chrysogonum virginianum</i>	Found in rich, moist woods and open areas	T	No	No; Known habitat types are not present within the Project area	-
Green Adder's-mouth	<i>Malaxis unifolia</i>	Part shade, shade; coniferous bogs and swamps, open upland woods	P	No	No; Known habitat types are not present within the Project area	-
Lance-leaved Violet	<i>Viola lanceolata</i>	Wet to moist sand prairies, sandy swales, soggy shrub prairies, moist sandy savannas, bogs, gravelly areas along streams or lakes	P	No	No; Known habitat types are not present within the Project area	-
Little Gray Polypody	<i>Pleopeltis polypodioides</i>	Branches of larger trees, most commonly live oak but also on other species of oak and magnolia and occasionally on rocks, fence posts and wet banks	P	No	No; Known habitat types are not present within the Project area	-

Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/ Species Anticipated?	Restricted Construction Dates
Plants (continued)						
Narrow-leaved Pinweed	<i>Lechea tenuifolia</i>	Part shade, sun; dry sandy or rocky soil; prairies, savannas, open woods, rock outcrops	P	No	No; Known habitat types are not present within the Project area	-
Narrow-leaved Toothwort	<i>Cardamine dissecta</i>	Rich, mesic forests	P	No	No; Known habitat types are not present within the Project area	-
Pink Dot Lichen	<i>Dibaeis absoluta</i>	Sandy soil over boulders and on rock outcrops in very shaded habitats	T	No	No; Known habitat types are not present within the Project area	-
Rattlesnake-master	<i>Eryngium yuccifolium</i>	Moist to slightly dry black soil prairies, clay prairies, sand prairies, thickets, typical savannas, sandy savannas, and limestone glades	P	No	No; Known habitat types are not present within the Project area	-
Rock-harlequin	<i>Corydalis sempervirens</i>	Open rocky woodlands, sandy savannas, ledges along thinly wooded bluffs, glades, gravelly areas along railroads	T	No	No; Known habitat types are not present within the Project area	-
Slender Blazing-star	<i>Liatris cylindracea</i>	Sun; dry, open prairie	T	No	No; Known habitat types are not present within the Project area	-
Southern Hairy Rock Cress	<i>Arabis pycnocarpa</i> var. <i>adpressipilis</i>	Ravines, pastures, cliffs, calcareous talus, dolomite glades, rich woods, bluffs, rocky ledges	P	No	No; Known habitat types are not present within the Project area	-
Southern Woodrush	<i>Luzula bulbosa</i>	Forest edges, forests, meadows and fields, woodlands	P	No	No; Known habitat types are not present within the Project area	-
Spring Coral-root	<i>Corallorhiza wisteriana</i>	Moist to dry forests, usually in base-rich soils	P	No	No; Known habitat types are not present within the Project area	-
Tennessee Bladder Fern	<i>Cystopteris tennesseensis</i>	Cracks and ledges on cliffs, rarely terrestrial; often on calcareous substrates or associated with man-made habitats such as rock walls or bridge abutments	P	No	No; Known habitat types are not present within the Project area	-
Thyme-leaved Pinweed	<i>Lechea minor</i>	Dry sandy or gravelly soil of pine-oak woodlands, savannas, sandhills, disturbed sites	T	No	No; Known habitat types are not present within the Project area	-

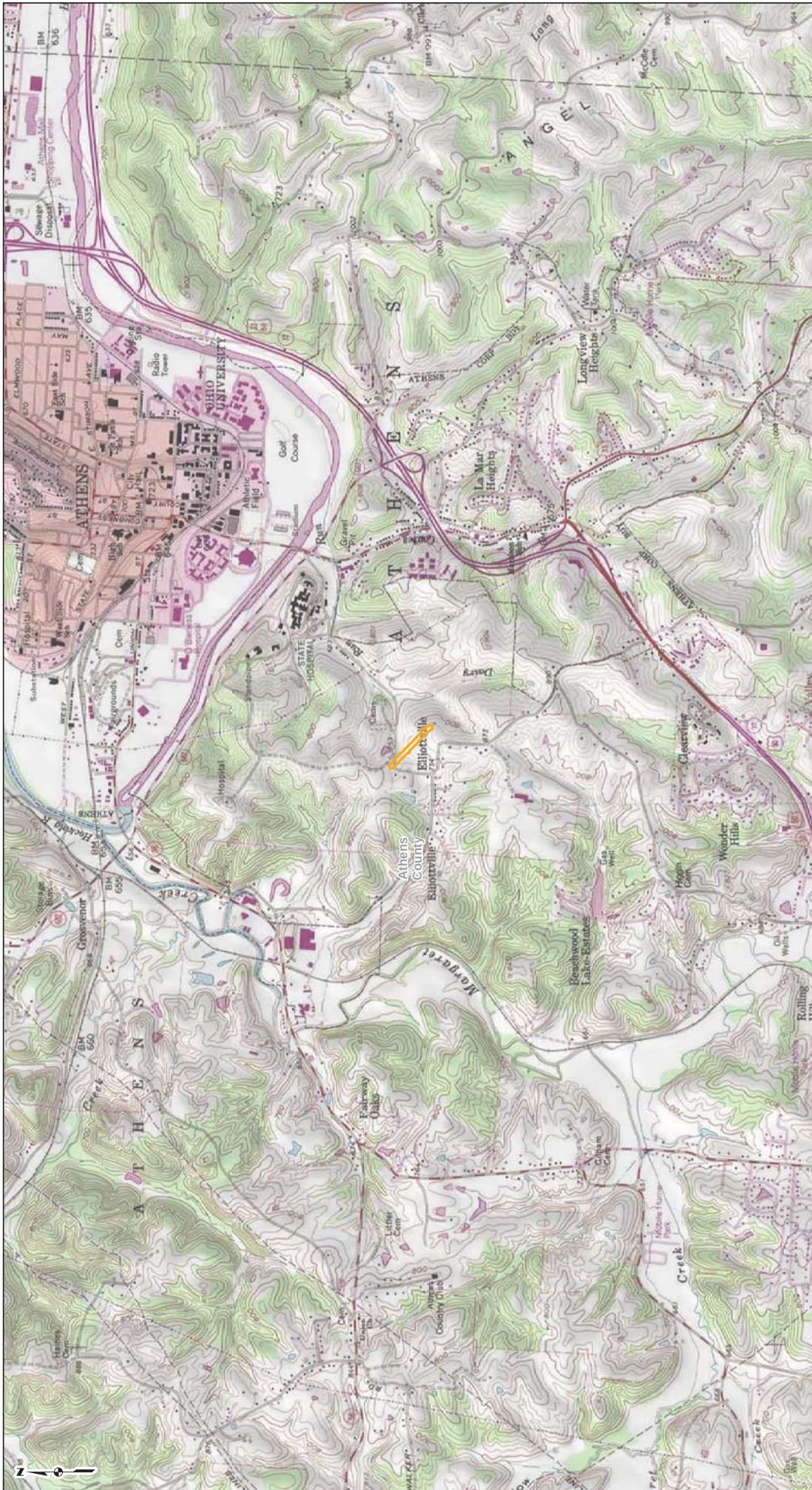
Table 2 (Continued)

Common Name	Scientific Name	Habitat Type	Listing Status ¹	Habitat Type Present Within the Project Area?	Impacts to Habitat/Species Anticipated?	Restricted Construction Dates
Plants (continued)						
Virginia Meadow-beauty	<i>Rhexia virginica</i>	Coastal plain marshes, sandy lake edges, dune swales, seepages, sandy marshes, sandy, peaty edges of wetlands, and sandy intermittent wetlands	P	No	No; Known habitat types are not present within the Project area	-
Wedge-leaved Violet	<i>Viola tripartita</i> var. <i>glaberrima</i>	Rich mesic hardwood forests	T	No	No; Known habitat types are not present within the Project area	-
Woodland Fern-leaved False Foxglove	<i>Aureolaria pedicularia</i> var. <i>pedicularia</i>	Dry, sand savanna or dry, open, oak woods with acidic soil	E	No	No; Known habitat types are not present within the Project area	-
Yellowish Gentian	<i>Gentiana alba</i>	Part shade, sun; moist soil; open woods, and meadows	T	No	No; Known habitat types are not present within the Project area	-

Notes:

- ¹ E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; FE = federal endangered; FT = federal threatened; FSC = federal species of concern; and FC = federal candidate.
- ² Natural Heritage Database record at or within a one-mile radius of the Project area.

FIGURES



PROJECT LOCATION



ATHENS COUNTY, OHIO

REFERENCE: USGS 7.5 TOPOGRAPHIC QUADRANGLES: THE
 COLUMBIAN PLATEAU AND THE CINCINNATI PLATEAU
 THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC
 TOPO AND USGS, ACCESSED 07/2020.

LEGEND

- Study Area
- County Boundary



FIGURE 1
 PROJECT LOCATION MAP

POSTON-ELLIOTT 138 KV LINE
 STRUCTURE RELOCATION PROJECT
 AMERICAN ELECTRIC POWER

DRAWN BY: EFJ
 CHECKED: EAD

DATE: 7/14/2020
 APPROVED: JJN

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PROJECT LOCATION



REFERENCES: ESRI WORLD IMAGERY, MAXAR (2016),
ARCGIS ONLINE, ACCESSED 07/20/2020, WORLD
MAP, ESRI, 2019, OPENSTREETMAP,
MAPBOX, MAPBOX, 2019, OPENSTREETMAP,
CONTRIBUTORS, AND THE GIS USER COMMUNITY,
OBTAINED THROUGH ESRI ARCGIS ONLINE, ACCESSED
07/20/2020, STREAM ELIGIBILITY, OHIO ENVIRONMENTAL
PROTECTION AGENCY (OEPA), 2017, NHD STREAMS,
NATIONAL HYDROGRAPHY DATASET (NHD), USGS, 2018,
WQS STREAMS, OHIO WATER QUALITY STANDARDS,
2010.

LEGEND

- Stream
NHD Stream
WQS Stream
Study Area
- Ohio EPA Stream Eligibility:
Ineligible
Possibly Eligible
Eligible
- 0 300 600 1,200 Feet

FIGURE 3
STREAM ELIGIBILITY MAP

POSTON-ELLIOTT 138 KV LINE
STRUCTURE RELOCATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: EFJ
CHECKED: EAD
DATE: 7/14/2020
APPROVED: JJN

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APPENDIX A

Photographs



Photograph 1. Stream S001, Upstream, Facing Northwest



Photograph 2. Stream S001, Downstream, Facing Southeast



Photograph 3. Stream S002, Upstream, Facing Southwest



Photograph 4. Stream S002, Downstream, Facing Northeast



Photograph 5. Stream S003, Upstream, Facing Northeast



Photograph 6. Stream S003, Downstream, Facing Southwest



Photograph 7. Representative Upland Habitat, Facing Southeast



Photograph 8. Representative Upland Habitat, Facing South

APPENDIX B

Primary Headwater Habitat Evaluation (HHEI) Data Form



Primary Headwater Habitat Field Evaluation Form

HHEI Score (sum of metrics 1+2+3)

19

SITE NAME/LOCATION Poston Fillet
SITE NUMBER _____ RIVER BASIN 05030204004 RIVER CODE _____ DRAINAGE AREA (mi²) 4.59
LENGTH OF STREAM REACH (ft) 30' LAT _____ LONG _____ RIVER MILE _____
DATE 6/11/20 SCORER KLV COMMENTS SOH-KLV-001

NOTE: Complete All Items On This Form - Refer to "Field Evaluation Manual for Ohio's PHWH Streams" for Instructions

STREAM CHANNEL MODIFICATIONS: ☒ NONE ☐ NATURAL CHANNEL ☐ RECOVERED ☐ RECOVERING ☐ RECENT OR NO RECOVERY

1. SUBSTRATE (Estimate percent of every type present). Check ONLY two predominant substrate TYPE boxes. (Max of 32). Add total number of significant substrate types found (Max of 8). Final metric score is sum of boxes A & B.				HHEI Metric Points Substrate Max = 40 14 A + B																																									
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This information must also be completed

RIPARIAN ZONE AND FLOODPLAIN QUALITY • NOTE: River Left (L) and Right (R) as looking downstream.

RIPARIAN WIDTH (Per Bank)		FLOODPLAIN QUALITY (Most Predominant per Bank)	
L	R	L	R
☒	☒	☐	☐
☐	☐	☒	☐
☐	☐	☐	☐
☐	☐	☐	☐
☐	☐	☐	☐

COMMENTS _____

FLOW REGIME (At Time of Evaluation) (Check ONLY one box):

☐ Stream Flowing	☒ Moist Channel, isolated pools, no flow (intermittent)
☐ Subsurface flow with isolated pools (interstitial)	☐ Dry channel, no water (ephemeral)

COMMENTS _____

SINUOSITY (Number of bends per 61 m (200 ft) of channel) (Check ONLY one box):

☐ None	☒ 1.0	☐ 2.0	☐ 3.0
☐ 0.5	☐ 1.5	☐ 2.5	☐ >3

STREAM GRADIENT ESTIMATE

☐ Flat (0.5 to 100 ft)	☐ Flat to Moderate	☒ Moderate (2 to 100 ft)	☐ Moderate to Severe	☐ Severe (10 to 100 ft)
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ADDITIONAL STREAM INFORMATION (This information must also be completed)

QHEI PERFORMED? ☐ Yes ☒ No QHEI Score _____ (If Yes, Attach Completed QHEI form)

DOWNSTREAM DESIGNATED USE(S)

☒ WWH Name: Dairy Run Distance from Evaluated Stream _____
☐ CWH Name: _____ Distance from Evaluated Stream _____
☐ EWH Name: _____ Distance from Evaluated Stream _____

MAPPING: ATTACH COPIES OF MAPS, INCLUDING THE ENTIRE WATERSHED AREA. CLEARLY MARK THE SITE LOCATION.

USGS Quadrangle Name: _____ NRCS Soil Map Page: _____ NRCS Soil Map Stream Order: _____
County: Athens Co. Township/City: Athens, OH

MISCELLANEOUS

Base Flow Conditions? (Y/N) Y Date of last precipitation: 6/10/20 Quantity: 6.50"

Photo-documentation Notes _____

Elevated Turbidity? (Y/N) N Canopy (% open): 0

Were samples collected for water chemistry? (Y/N) N Lab Sample # or ID (attach results): _____

Field Measures: Temp (°C) _____ Dissolved Oxygen (mg/l) _____ pH (S.U.) _____ Conductivity (umhos/cm) _____

Is the sampling reach representative of the stream (Y/N) Y If not, explain: _____

Additional comments/description of pollution impacts: _____

BIOLOGICAL OBSERVATIONS

(Record all observations below)

Fish Observed? (Y/N) N Species observed (if known): _____

Frogs or Tadpoles Observed? (Y/N) N Species observed (if known): _____

Salamanders Observed? (Y/N) N Species observed (if known): _____

Aquatic Macroinvertebrates Observed? (Y/N) N Species observed (if known): _____

Comments Regarding Biology: _____

DRAWING AND NARRATIVE DESCRIPTION OF STREAM REACH (This must be completed)

Include important landmarks and other features of interest for site evaluation and a narrative description of the stream's location

FLOW →

Trees/Shrubs

Primary Headwater Habitat Field Evaluation Form HHEI Score (sum of metrics 1+2+3) 40	
SITE NAME/LOCATION <u>Paston Elliot</u>	
SITE NUMBER _____	RIVER BASIN <u>050501040804</u> RIVER CODE _____ DRAINAGE AREA (mi ²) <u>4.9</u>
LENGTH OF STREAM REACH (ft) <u>229</u>	LAT _____ LONG _____ RIVER MILE _____
DATE <u>6/11/20</u> SCORER <u>RLV</u>	COMMENTS <u>SOH-KLV-002</u>

NOTE: Complete All Items On This Form - Refer to "Field Evaluation Manual for Ohio's PHWH Streams" for Instructions

STREAM CHANNEL MODIFICATIONS: ☒ NONE / NATURAL CHANNEL ☐ RECOVERED ☐ RECOVERING ☐ RECENT OR NO RECOVERY

1. SUBSTRATE (Estimate percent of every type present). Check ONLY two predominant substrate TYPE boxes. (Max of 32). Add total number of significant substrate types found (Max of 8). Final metric score is sum of boxes A & B.		HHEI Metric Points Substrate Max = 40 20																											
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This information must also be completed

RIPARIAN ZONE AND FLOODPLAIN QUALITY * NOTE: River Left (L) and Right (R) as looking downstream.

RIPARIAN WIDTH (Per Bank)		FLOODPLAIN QUALITY (Most Predominant per Bank)	
L	R	L	R
☒	☒	☐	☐
☐	☐	☒	☒
☐	☐	☐	☐
☐	☐	☐	☐
☐	☐	☐	☐

COMMENTS _____

FLOW REGIME (At Time of Evaluation) (Check ONLY one box):

☒ Stream Flowing	☐ Moist Channel, isolated pools, no flow (intermittent)
☐ Subsurface flow with isolated pools (interstitial)	☐ Dry channel, no water (ephemeral)

COMMENTS _____

SINUOSITY (Number of bends per 61 m (200 ft) of channel) (Check ONLY one box):

☐ None	☒ 1.0	☐ 2.0	☐ 3.0
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STREAM GRADIENT ESTIMATE

☐ Flat (0.5 ft/100 ft)	☐ Flat to Moderate	☒ Moderate (2 ft/100 ft)	☐ Moderate to Severe	☐ Severe (10 ft/100 ft)
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ADDITIONAL STREAM INFORMATION (This information must also be completed):

QHEI PERFORMED? ☐ Yes ☒ No QHEI Score _____ (If Yes, Attach Completed QHEI form)

DOWNSTREAM DESIGNATED USE(S)

☒ WWH Name: Dairy Run Distance from Evaluated Stream _____
☐ CWH Name: _____ Distance from Evaluated Stream _____
☐ EWH Name: _____ Distance from Evaluated Stream _____

MAPPING: ATTACH COPIES OF MAPS, INCLUDING THE ENTIRE WATERSHED AREA. CLEARLY MARK THE SITE LOCATION.

USGS Quadrangle Name: _____ NRCS Soil Map Page: _____ NRCS Soil Map Stream Order: _____

County: Athens Co. Township/City: Athens, OH

MISCELLANEOUS

Base Flow Conditions? (Y/N) Y Date of last precipitation: 6/10/20 Quantity: 4.50"

Photo-documentation Notes: _____

Elevated Turbidity? (Y/N) N Canopy (% open): 0

Were samples collected for water chemistry? (Y/N) N Lab Sample # or ID (attach results): _____

Field Measures: Temp (°C) _____ Dissolved Oxygen (mg/l) _____ pH (S.U.) _____ Conductivity (umhos/cm) _____

Is the sampling reach representative of the stream (Y/N) Y If not, explain: _____

Additional comments/description of pollution impacts: _____

BIOLOGICAL OBSERVATIONS

(Record all observations below)

Fish Observed? (Y/N) N Species observed (if known): _____

Frogs or Tadpoles Observed? (Y/N) N Species observed (if known): _____

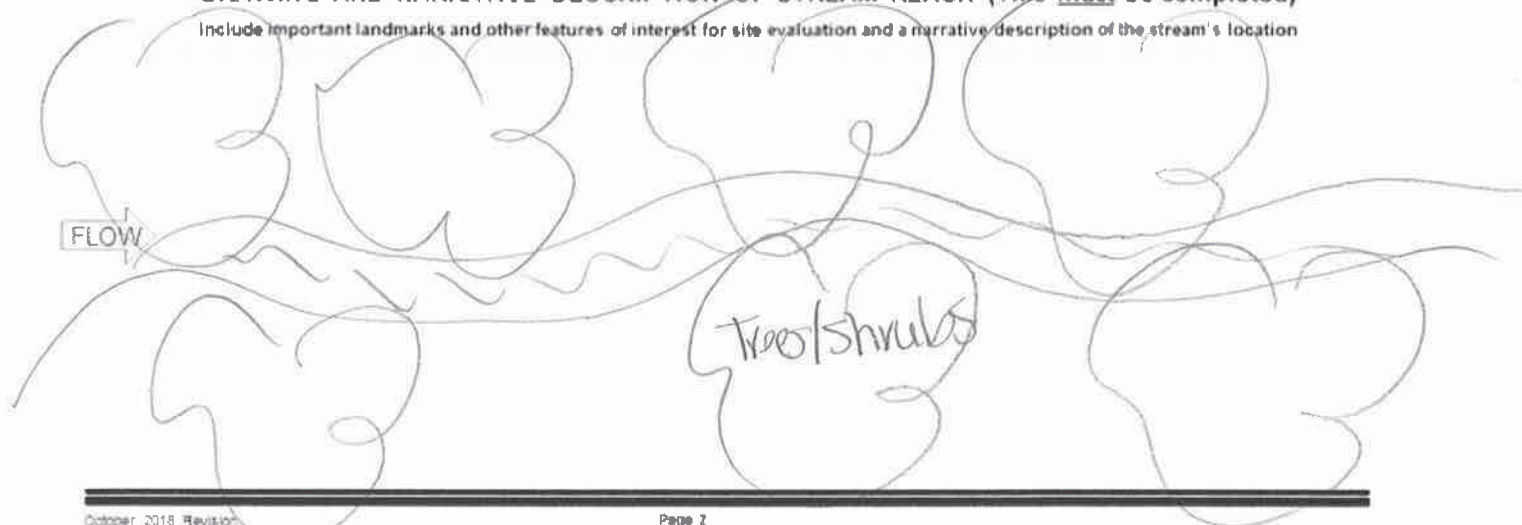
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Comments Regarding Biology: _____

DRAWING AND NARRATIVE DESCRIPTION OF STREAM REACH (This must be completed)

Include important landmarks and other features of interest for site evaluation and a narrative description of the stream's location





Primary Headwater Habitat Field Evaluation Form

HHEI Score (sum of metrics 1+2+3)

34

SITE NAME/LOCATION Poston Elliott
SITE NUMBER _____ RIVER BASIN 050302040304 RIVER CODE _____ DRAINAGE AREA (mi²) 4.5qmi
LENGTH OF STREAM REACH (ft) 130 LAT _____ LONG _____ RIVER MILE _____
DATE 6/11/20 SCORER KLV COMMENTS SOH-KLV-003

NOTE: Complete All Items On This Form - Refer to "Field Evaluation Manual for Ohio's PHWH Streams" for Instructions

STREAM CHANNEL MODIFICATIONS: ☒ NONE ☐ NATURAL CHANNEL ☐ RECOVERED ☐ RECOVERING ☐ RECENT OR NO RECOVERY

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COMMENTS _____ MAXIMUM POOL DEPTH (centimeters): <u>5</u>																																
3. BANK FULL WIDTH (Measured as the average of 3 - 4 measurements). (Check ONLY one box):				Bankfull Width Max=30 15																												
<table border="1"> <tbody> <tr><td>☐ > 4.0 meters (> 13') [30 pts]</td><td>☒ > 1.0 m - 1.5 m (> 3' 3" - 4' 8") [15 pts]</td></tr> <tr><td>☐ > 3.0 m - 4.0 m (> 9' 7" - 13') [25 pts]</td><td>☐ ≤ 1.0 m (≤ 3' 3") [5 pts]</td></tr> <tr><td>☐ > 1.5 m - 3.0 m (> 4' 8" - 9' 7") [20 pts]</td><td></td></tr> </tbody> </table>					☐ > 4.0 meters (> 13') [30 pts]	☒ > 1.0 m - 1.5 m (> 3' 3" - 4' 8") [15 pts]	☐ > 3.0 m - 4.0 m (> 9' 7" - 13') [25 pts]	☐ ≤ 1.0 m (≤ 3' 3") [5 pts]	☐ > 1.5 m - 3.0 m (> 4' 8" - 9' 7") [20 pts]																							
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COMMENTS _____ AVERAGE BANKFULL WIDTH (meters) <u>4'</u>																																

This information must also be completed

RIPARIAN ZONE AND FLOODPLAIN QUALITY • NOTE: River Left (L) and Right (R) as looking downstream.

RIPARIAN WIDTH (Per Bank)		FLOODPLAIN QUALITY (Most Predominant per Bank)	
L	R	L	R
☒	☒	☒	☐
☐	☐	☒	☐
☐	☐	☐	☐
☐	☐	☐	☐
☐	☐	☐	☐

COMMENTS _____

FLOW REGIME (At Time of Evaluation) (Check ONLY one box):

☒ Stream Flowing	☐ Moist Channel, isolated pools, no flow (intermittent)
☐ Subsurface flow with isolated pools (interstitial)	☐ Dry channel, no water (ephemeral)

COMMENTS _____

SINUOSITY (Number of bends per 61 m (200 ft) of channel) (Check ONLY one box):

☐ None	☒ 1.0	☐ 2.0	☐ 3.0
☐ 0.5	☐ 1.5	☐ 2.5	☐ >3

STREAM GRADIENT ESTIMATE

☐ Flat (0.5 %100 ft)	☐ Flat to Moderate	☒ Moderate (2 %100 ft)	☐ Moderate to Severe	☐ Severe (10 %100 ft)
---	---	--	---	--

ADDITIONAL STREAM INFORMATION (This information must also be completed):

QHEI PERFORMED? ☐ Yes ☒ No QHEI Score _____ (If Yes, Attach Completed QHEI form)

DOWNSTREAM DESIGNATED USE(S)

☒ WWH Name: Darry Run Distance from Evaluated Stream _____
☐ CWH Name: _____ Distance from Evaluated Stream _____
☐ EWH Name: _____ Distance from Evaluated Stream _____

MAPPING: ATTACH COPIES OF MAPS, INCLUDING THE ENTIRE WATERSHED AREA. CLEARLY MARK THE SITE LOCATION.

USGS Quadrangle Name: _____ NRCS Soil Map Page: _____ NRCS Soil Map Stream Order: _____

County: Athens Co. Township/City: Athens, OH

MISCELLANEOUS

Base Flow Conditions? (Y/N) Y Date of last precipitation: 6/10/20 Quantity: 1.50"

Photo-documentation Notes _____

Elevated Turbidity? (Y/N) N Canopy (% open): 0

Were samples collected for water chemistry? (Y/N): N Lab Sample # or ID (attach results): _____

Field Measures: Temp (°C) _____ Dissolved Oxygen (mg/l) _____ pH (S.U.) _____ Conductivity (umhos/cm) _____

Is the sampling reach representative of the stream (Y/N) Y If not, explain: _____

Additional comments/description of pollution impacts: _____

BIOLOGICAL OBSERVATIONS

(Record all observations below)

Fish Observed? (Y/N) N Species observed (if known): _____

Frogs or Tadpoles Observed? (Y/N) N Species observed (if known): _____

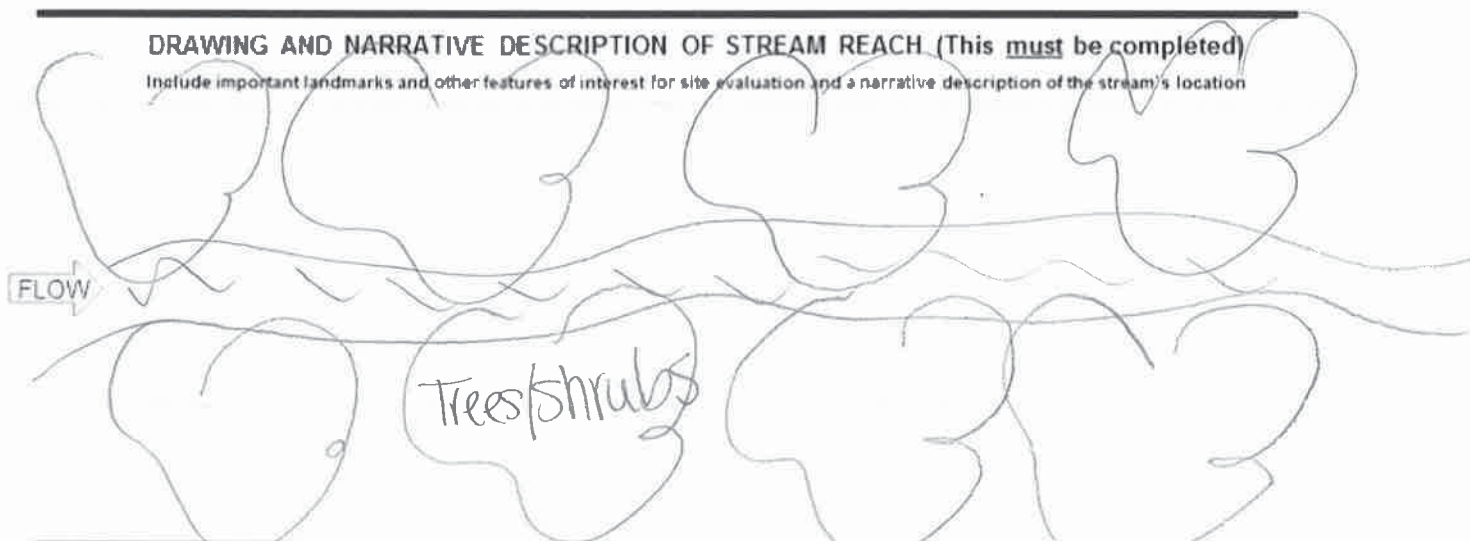
Salamanders Observed? (Y/N) N Species observed (if known): _____

Aquatic Macroinvertebrates Observed? (Y/N) N Species observed (if known): _____

Comments Regarding Biology: _____

DRAWING AND NARRATIVE DESCRIPTION OF STREAM REACH (This must be completed)

Include important landmarks and other features of interest for site evaluation and a narrative description of the stream's location



APPENDIX C

Agency Coordination

From: Ohio, FW3 <ohio@fws.gov>
Sent: Wednesday, July 15, 2020 8:46 AM
To: Kristen Vonderwish; Joshua Noble
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate
Subject: AEP Poston Elliott 138 kV Line Structure Relocation Project, Athens Co

EXTERNAL E-MAIL MESSAGE



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# 03E15000-2020-TA-1817

Dear Ms. Vonderwish,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found 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 breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet 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, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are

present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is 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, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then 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 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. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army 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. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or 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, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew,

Acting Environmental Services Administrator, at (614) 265-6387 or
at mike.pettegrew@dnr.state.oh.us.

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

Sincerely,

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

Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW



Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

July 8, 2020

Project R200062.13

Ms. Patrice M. Ashfield
United States Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

**American Electric Power
Poston – Elliott 138 kV Line Structure Relocation Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Athens County, Ohio**

Dear Ms. Ashfield:

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

The proposed Project involves the relocation of a structure on the Poston-Elliott 138 kV Transmission Line adjacent to the Elliott Station.

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists mainly of maintained transmission line right-of-way across forested area, open fields, residential and urban areas. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 234.203.0772 or via email at k.vonderwish@gaiconsultants.com if you have any questions or require further information.

Sincerely,

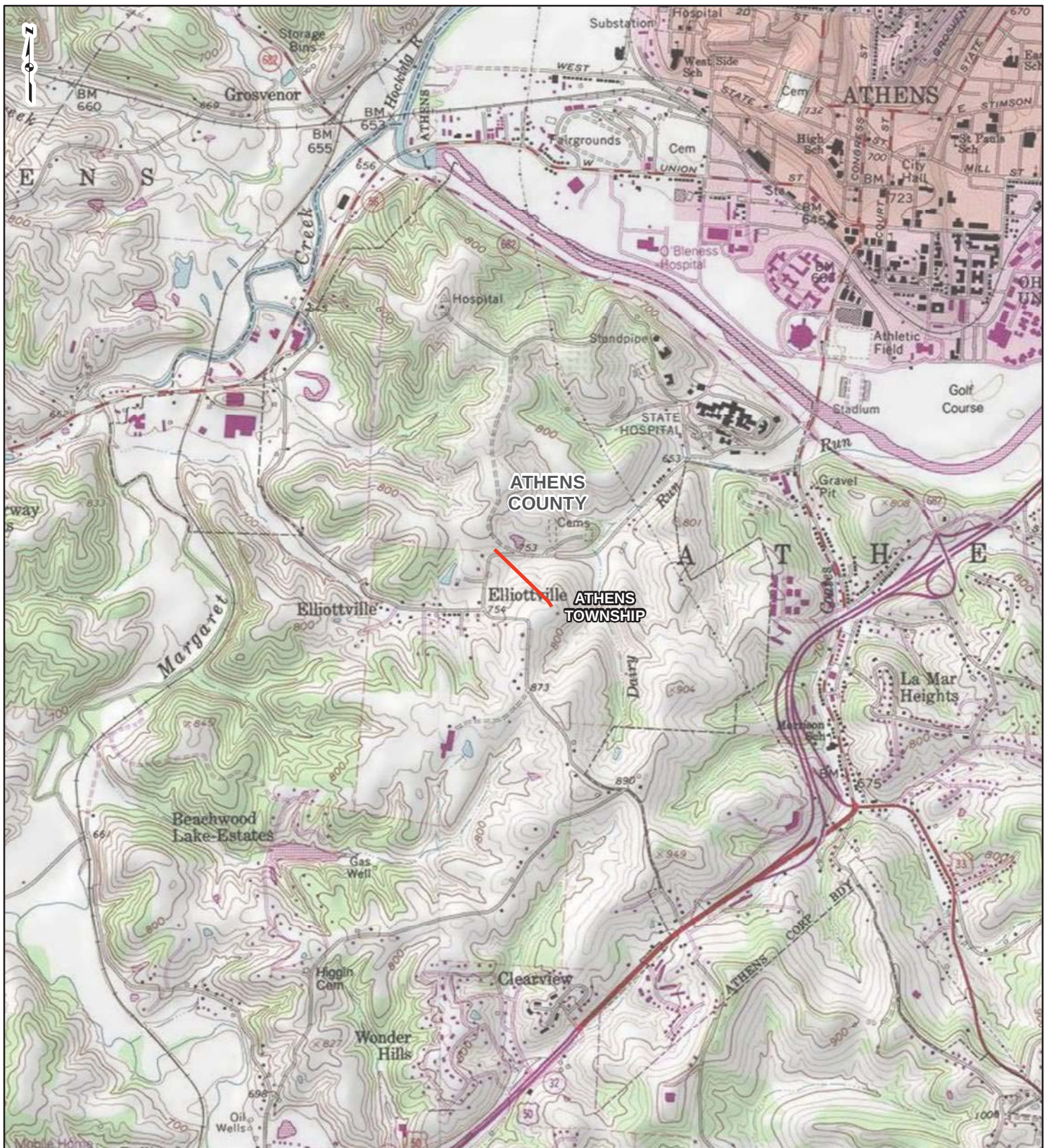
GAI Consultants, Inc.

A handwritten signature in blue ink, appearing to read 'K. Vonderwish', on a light blue background.

Kristen L. Vonderwish
Project Environmental Specialist

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



PROJECT LOCATION



ATHENS COUNTY, OHIO

LEGEND

- Proposed Transmission
- Township Boundary
- County Boundary

0 1,000 2,000 4,000 Feet

PROJECT LOCATION MAP

POSTON-ELLIOTT 138kV
STRUCTURE RELOCATION
AMERICAN ELECTRIC POWER



DRAWN BY: KJB
CHECKED: EFJ

DATE: 7/8/2020
APPROVED:

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: THE PLAINS (1977) AND ATHENS (1985), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 07/2020.



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
Fax: (614) 267-4764

August 10, 2020

Kristen Vonderwish
GAI Consultants
6000 Town Center Blvd., Suite 300
Canonsburg, PA 15317

Re: 20-694; AEP-Poston Elliott 138 kV Line Structure Relocation Project

Project: The proposed Project involves the relocation of a structure on the Poston-Elliott 138 kV Transmission Line adjacent to the Elliott Station.

Location: The proposed project is located in Athens Township, Athens 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 no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

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 entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the “OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING”. If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31, however, limited summer tree cutting may be acceptable after consultation with DOW (contact Sarah Stankavich, sarah.stankavich@dnr.state.oh.us).

The DOW also recommends that a desktop or field-based habitat assessment is conducted to determine if there are potential hibernaculum(a) present within the project area. Habitat assessments should be conducted in accordance with the current USFWS “Range-wide Indiana Bat Survey Guidelines” and submitted to Sarah Stankavich, sarah.stankavich@dnr.state.oh.us if potential hibernacula are present within .25 miles of the project area. If a potential hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the following listed mussel species.

Federally Endangered

club shell (*Pleurobema clava*)
fanshell (*Cyprogenia stegaria*)
pink mucket (*Lampsilis orbiculata*)
sheepnose (*Plethobasus cyphus*)
snuffbox (*Epioblasma triquetra*)

State Threatened

black sandshell (*Ligumia recta*)
fawnsfoot (*Truncilla donaciformis*)
threehorn wartyback (*Obliquaria reflexa*)

Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the following listed fish species.

State Endangered

spotted darter (*Etheostoma maculatum*)

State Threatened

channel darter (*Percina copelandi*)

paddlefish (*Polyodon spathula*)

river darter (*Percina shumardi*)

The DOW recommends no in-water work in perennial streams from April 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

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

The project is within the range of the eastern spadefoot toad (*Scaphiopus holbrookii*), a state endangered species. This species is found in areas of sandy soils that are associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the midland mud salamander (*Pseudotriton montanus diastictus*), a state threatened species. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

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

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

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

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)



Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

July 8, 2020
Project R200062.13

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

**American Electric Power
Poston – Elliott 138 kV Line Structure Relocation Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Athens County, Ohio**

Dear Staff:

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

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GAI and AEP thank you in advance for your assistance. Please contact me at 234.203.0772 or via email at k.vonderwish@gaiconsultants.com if you have any questions or require further information.

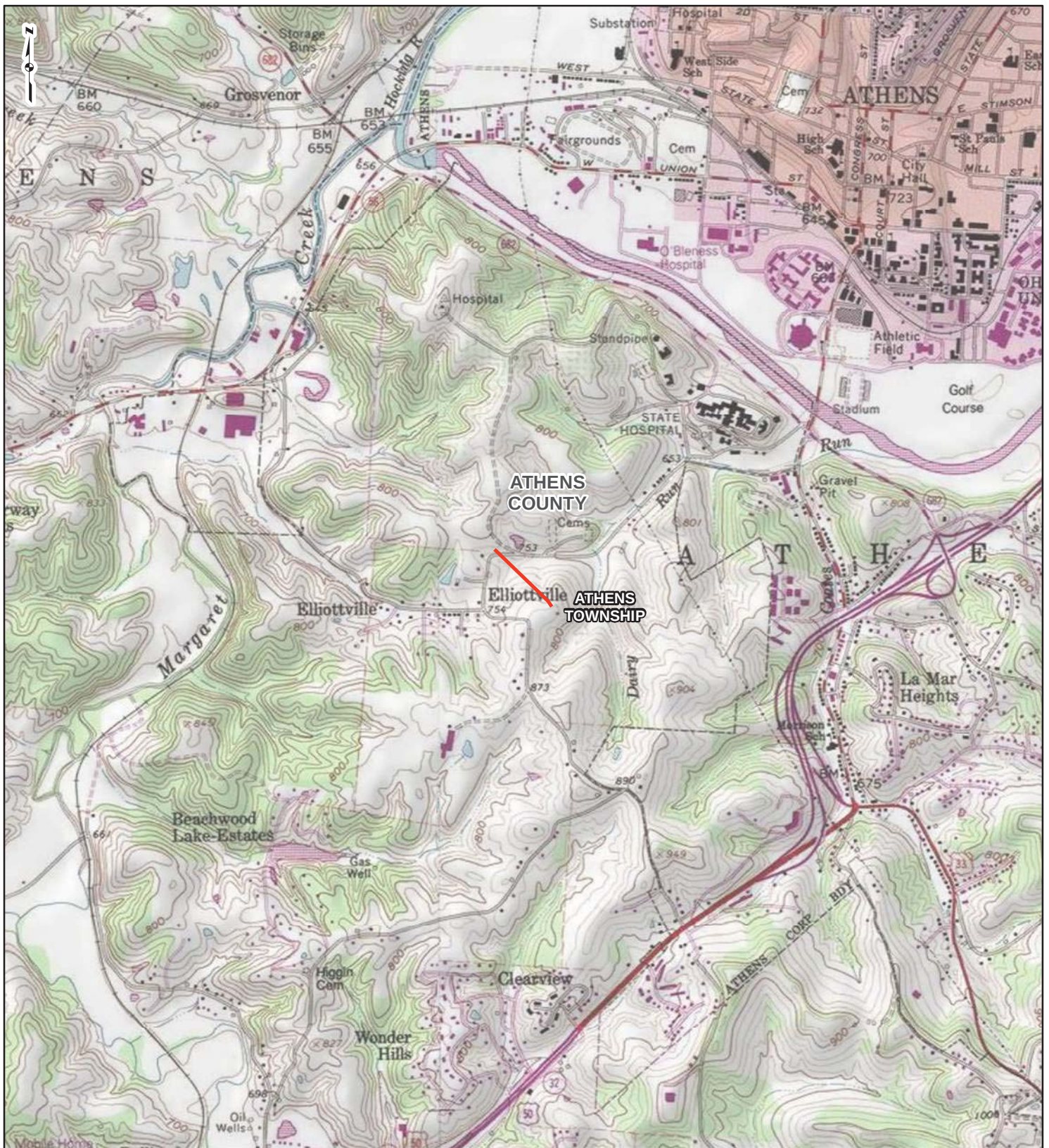
Sincerely,
GAI Consultants, Inc.

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Kristen L. Vonderwish
Project Environmental Specialist

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PROJECT LOCATION MAP



PROJECT LOCATION



ATHENS COUNTY, OHIO

LEGEND

- Proposed Transmission
- Township Boundary
- County Boundary

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POSTON-ELLIOTT 138kV
STRUCTURE RELOCATION
AMERICAN ELECTRIC POWER



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/17/2020 4:37:44 PM

in

Case No(s). 20-1308-EL-BLN

Summary: Notice Poston-Elliott (20-1308-EL-BLN) Structure Relocation Project Final Application for OPSB electronically filed by Tanner Wolfram on behalf of Ohio Power Company