

The boundaries shown herein are not the result of a survey and cannot be used in property conveyances.



- |                       |                             |
|-----------------------|-----------------------------|
| ● Structures          | ▨ Agricultural              |
| — Hocking Alignment   | ▨ Forest/Wood lot           |
| — Roads               | ▨ Residential               |
| ++ Railroads          | ▨ Recreational              |
| ▨ Quarter Mile Buffer | ▨ Commercial/Industrial     |
| ▨ Township Boundary   | ▨ Industrial/Transportation |
| ▨ City Boundary       | ▨ Open Water                |
| ▨ Map Sheet           | ▨ Delineated Wetlands       |

1" = 500'

0 500

Feet

The State of Ohio

Hocking and Fairfield Counties

Falls, Marion, Good Hope, Berne and Hocking Townships

Date: 1/30/2014

Author: JA

Hocking West Lancaster  
31221

Page 29 of 29

## Land Use / Land Cover

AEP American's Energy Partner



January 30, 2014

## AMERICAN ELECTRIC POWER COMPANY

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### **Hocking – West Lancaster 138 kV Line Rebuild Project** *Threatened and Endangered Species Survey Report*



PROJECT NUMBER:  
127705.00.04

PROJECT CONTACT:  
Jaime Newell

EMAIL:  
[jaime.newell@powereng.com](mailto:jaime.newell@powereng.com)

PHONE:  
989-745-5577



**Hocking – West Lancaster 138 kV Line Rebuild Project**  
*Threatened and Endangered Species Survey Report*

*PREPARED FOR: AMERICAN ELECTRIC POWER COMPANY*  
*PREPARED BY: MIKE BANAITIS*  
*207-869-1263*  
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## INTERNAL TRACKING SHEET

Project Name	138 kV Line Rebuild		
Project Number (include subtask numbers)	127705.00.04		
Project Manager	Jamie Newell		
Project Coordinator	Mike Banaitis		
Project SA	Candy Dennison		
Document Author	Mike Banaitis		
Folder Location	PER-02-01		
Footer Number			
TASK	NAME	DATE	COMMENTS
Peer Review			
Sr. Staff Review			
Technical Edit	Heidi Horner	1/29/14	
Formatting (SA)			
PM Review	Jaime Newell	1/29/14	
DOCUMENT REVISION			
REVISION	DATE	COMMENTS	

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## **ACRONYMS AND ABBREVIATIONS**

AAP	Avian Protection Plan
AEP	American Electric Power Company
GIS	geographic information system
kV	kilovolt
OAC	Ohio Administrative Code
ODNR	Ohio Department of Natural Resources
OPSB	Ohio Power Siting Board
POWER	POWER Engineers, Inc.
ROW	right-of-way
USFWS	United States Fish and Wildlife Service

## 1.0 PROJECT DESCRIPTION

American Electric Power Company (AEP) is proposing to improve an existing transmission line in Hocking and Fairfield counties, Ohio. The single-circuit 138 kilovolt (kV) wood H-frame line runs between AEP's Hocking and West Lancaster substations. The existing 19.3 mile transmission line consists mostly of wood, two-pole H-frame structures and will be rebuilt utilizing steel pole, H-frame and 3-pole guyed structures. The proposed rebuild will be located entirely within existing right-of-way (ROW).

The Ohio Power Siting Board (OPSB) Letter of Notification guidelines require that prior to construction, AEP describe surveys for areas of ecological concern. Ohio Administrative Code (OAC) Rule 4906-15-11-01(E) (1) describes the requirement as such:

(E) Environmental Data. Describe the environmental impacts of the proposed project. This description shall include the following information:

(1) 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 area likely to be disturbed by the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

AEP retained POWER Engineers, Inc. (POWER) to review the proposed project for threatened and endangered species described in OAC Rule 4906-15-11-01(E) (1). To that end, a review of existing documents and a field assessment of general habitat suitability within a 100-foot survey corridor centered on the existing 138 kV Hocking – West Lancaster transmission line were conducted.

Topography in the survey area ranges from flat floodplains near the Hocking River to very steep hills. Waters within the survey area ultimately drain to the Hocking River.

The southern terminus of the survey area is located approximately 1.0 mile south of Logan, Ohio, while the northern terminus of the survey area is located approximately 1.75 miles southwest of Lancaster, Ohio (Figures 1 and 2). Land use within and adjacent to the project area is largely undeveloped, and consists of a mix of woodland, agricultural, residential, and some commercial/industrial parcels near Logan.

## 2.0 METHODS

The survey was initiated by POWER with a review of existing online documents from the Ohio Department of Natural Resources (ODNR) and the United States Fish and Wildlife Service (USFWS). Additionally, POWER submitted a request to the ODNR Natural Heritage database for records of species of concern located near the project. The geographic information system (GIS) shapefiles received from ODNR were then loaded into the project GIS maps as an overlay to show proximity of each known species record to the project area.

Agency coordination letters requesting comments on the proposed project were submitted to the ODNR and USFWS on January 21<sup>st</sup>, 2014. Copies of these letters are included in Appendix A.

A review of information on each species was utilized to determine habitat types that each species are known to utilize. This information was used to perform a desktop aerial photo review of the project. Additionally, the available habitat information for each species was used as a guide in conducting an in-field general habitat suitability assessment for the potential of each species to inhabit the project area.

### 3.0 RESULTS

POWER wildlife biologists David Bell, Drew Carson, Charlotte Stallone, and Amada Fabis conducted general habitat suitability assessments in conjunction with the wetland/stream field investigations from October 7<sup>th</sup> to October 11<sup>th</sup>, 2013.

#### 3.1 State Listed Species

The ODNr Natural Heritage Database search listed several species occurrences as well as a number of management areas within one mile of the project centerline (Figure 3). Of the identified species and management areas, there are five species (two mollusks and three flowering plants) listed as either state threatened or endangered in addition to the bald eagle (Table 1).

**TABLE 1 STATE LISTED SPECIES IDENTIFIED BY ODNr'S NATURAL HERITAGE DATABASE**

SCIENTIFIC NAME	COMMON NAME	CATEGORY	STATUS
<i>Haliaeetus leucocephalus</i>	Bald Eagle	Bird	N/A
<i>Rhododendron calendulaceum</i>	Flame Azalea	Flowering Plant	Endangered
<i>Rhododendron maximum</i>	Great Rhododendron	Flowering Plant	Threatened
<i>Pycnanthemum verticillatum</i> var. <i>pilosum</i>	Hairy Mountain Mint	Flowering Plant	Threatened
<i>Pleurobema clava</i>	Clubshell	Mollusk	Endangered
<i>Quadrula cylindrical cylindrical</i>	Rabbitsfoot	Mollusk	Threatened

Source: ODNr 2014.

According to the ODNr Natural Heritage Database information, the only state listed plant species that is known to be located immediately adjacent to the project ROW is the Great Rhododendron (near Structures 175 and 180), with the remaining species located greater than 1,000 feet away. Due to the on-going vegetation maintenance program within the transmission line ROW and habitat the Great Rhododendron prefers (i.e., moderate shade in damp, deep woods, as opposed to an open, periodically cleared transmission corridor), it is not expected that the Great Rhododendron would be present within the project corridor (ODNr 2014).

The ODNr Natural Heritage Database also listed a bald eagle nesting site approximately a quarter mile (1,300 feet) from the project corridor. Due to the nature of the project and the implementation of AEP's Avian Protection Plan (APP), which aims to reduce the incidence of bird interactions as well as prevent a bird take, it is anticipated that there will be no impacts on the bald eagles in the project vicinity (AEP 2012).

To date, no response has been received from ODNr regarding the request for comment letter sent out on January 21, 2014.



### 3.2 Federal Listed Species

Review of the current list of federally listed species identified eight protected species (Table 2) as potentially occurring in Franklin County (USFWS 2014a).

**TABLE 2 FEDERAL LISTED SPECIES FOR FAIRFIELD AND HOCKING COUNTIES**

SCIENTIFIC NAME	COMMON NAME	CATEGORY	STATUS
<i>Myotis sodalis</i>	Indiana Bat	Mammal	Endangered
<i>Myotis septentrionalis</i>	Northern Long-Eared Bat	Mammal	Proposed Endangered
<i>Aconitum noveboracense</i>	Northern Wild Monkshood	Flowering Plant	Threatened
<i>Trifolium stoloniferum</i>	Running Buffalo Clover	Flowering Plant	Endangered
<i>Isotria medeoloides</i>	Small Whorled Pogonia	Flowering Plant	Threatened
<i>Nicrophorus americanus</i>	American Burying Beetle	Beetle	Endangered
<i>Sistrurus catenatus</i>	Eastern Massasauga	Reptile	Candidate

Source: USFWS 2014a.

There is no in-water work or permanent impacts to streams or wetlands proposed for the project. It is expected that aerial stream crossings will be installed by accessing structure locations on either side of the stream, with no need to physically enter the stream, or cause any disturbance to stream banks. Due to the lack of permanent stream or wetland impacts required for project construction, and the eastern Massasauga's preference for wet prairies and sedge meadows, there are no anticipated impacts on this protected reptile species as a result of the project (USFWS 2014b).

Both the Indiana bat and the northern long-eared bat utilize dead or dying trees with exfoliating bark for roosts, cover, and breeding activities during the summer months (USFWS 2014c, 2014d). During the colder portion of the year, the bats hibernate in caves and mines (USFWS 2014c, 2014d). The general habitat suitability assessment effort surveyed the project area for potential Indiana bat/northern long-eared bat habitat. No caves or mines were identified within the ROW corridor. Therefore, it is not anticipated that the proposed project will impact winter bat habitat.

Potential summer roosting trees were located by POWER biologists in wooded areas adjacent to the cleared ROW corridor. Due to previous maintenance activities conducted on the existing corridor, no trees currently exist within the cleared ROW. Thus, any minor clearing activities potentially required for project construction would be limited to areas located outside of the ROW, for instance on access roads. Any and all clearing of potential roosting trees that may be required for this project would only be performed during the winter months between October 1<sup>st</sup> and March 31<sup>st</sup>, while bats are hibernating and not active within the immediate project area. For the reasons provided above, the project is unlikely to negatively impact either the Indiana bat or northern long-eared bat.

Due to the habitat preferences of the three federally listed plant species, such as old growth forests, talus slopes, shaded cliffs, and frequent ground disturbance, it is not anticipated that these species would be located within the cleared ROW corridor (USFWS 2014e, USFWS 2014f, USFWS 2014g).

The American Burying Beetle is considered a habitat generalist with a slight preference for grasslands and open understory oak hickory forests that preys primarily on carrion (USFWS 2014h). There were

no observations of either carrion or the types of habitat preferred by the American Burying Beetle within or immediately adjacent to the proposed project area during the general habitat suitability assessment.

To date, no response has been received from USFWS regarding the request for comment letter sent out on January 21, 2014.

## **4.0 SUMMARY**

AEP retained POWER to conduct a general habitat suitability assessment for threatened and endangered species within a 100-foot corridor centered on the existing Hocking-West Lancaster 138 kV transmission line. The habitat suitability assessment will be used to assist AEP's efforts to avoid impacts to threatened and endangered species potentially present in the study area during construction activities. The field survey was conducted by POWER field biologists from October 7<sup>th</sup> to October 11<sup>th</sup>, 2013.

No state listed species, and no unique habitats were observed within the ROW corridor during the general habitat suitability assessment. The ODNr Biodiversity Database revealed five state-listed threatened or endangered species, as well as numerous management areas, within the vicinity of the project area. However, it is not anticipated that the proposed project will have a negative impact on any of these species, due to the characteristics of their preferred habitats.

The ODNr Natural Heritage Database also identified one bald eagle nesting site approximately 1,300 feet from the proposed project corridor. However, due to the limited scope and duration of the proposed project in concert with AEP's Avian Protection Plan, no impacts to the bald eagle are anticipated.

There are seven federally listed species in Fairfield and Hocking counties (USFWS 2014a). Two species on the federal list are the Indiana bat and the northern long-eared bat. Any removal of potential roosting trees that may be required for project construction will take place during the winter months (October 1<sup>st</sup> to March 31<sup>st</sup>), so there are no anticipated impacts to the two protected bat species potentially present in the project area. There will be no permanent impacts to wetlands or streams required for this project, so it is anticipated that there will be no adverse impact to the eastern Massasauga. Due to the habitat preferences of the three federally listed plant species, it is not anticipated that these species would be located within the cleared ROW corridor; therefore, impacts to these species are not likely. As there were no observations of carrion or the American Burying Beetle during the general habitat suitability assessment, it is anticipated that impacts to this species is also unlikely. Due to inherent scope and location of the proposed project, as well as timing of construction activities such as tree clearing, it is anticipated that the project will not have an impact on federally endangered, threatened, or candidate species, or their habitats.

## **5.0 CONCLUSION**

Based upon the nature and scope of the proposed project, review of federal and state records of listed species, and the field survey conducted from October 7<sup>th</sup> to October 11<sup>th</sup>, 2013, it is not expected that federal or state listed species will be impacted by the project as currently planned.

## 6.0 REFERENCES

American Electric Power (AEP). 2012. Avian Protection Plan.

Ohio Department of Natural Resources (ODNR). 2014. Great Rhododendron (*Rhododendron maximum*) Fact Sheet. Available at <http://ohiodnr.com/tabid/1527/Default.aspx>. Accessed 1/24/2014.

United States Fish and Wildlife Service (USFWS). 2014a. Endangered Species Act List: Fairfield and Hocking Counties, Ohio. Available at <http://ecos.fws.gov/ipac/>. Accessed 1/24/2014.

\_\_\_\_\_. 2014b. Endangered Species Fact Sheet: Eastern Massasauga (*Sistrurus catenatus*). Available at <http://www.fws.gov/midwest/endangered/mammals/nlba/nlbaFactSheet.html>. Accessed 1/24/2014.

\_\_\_\_\_. 2014c. Endangered Species Fact Sheet: Indiana Bat (*Myotis sodalis*). Available at <http://www.fws.gov/midwest/Endangered/mammals/inba/inbafactsht.html>. Accessed 1/24/2014.

\_\_\_\_\_. 2014d. Endangered Species Fact Sheet: Northern Long-Eared Bat (*Myotis septentrionalis*). Available at <http://www.fws.gov/midwest/endangered/mammals/nlba/nlbaFactSheet.html>. Accessed 1/24/2014.

\_\_\_\_\_. 2014e. Endangered Species Fact Sheet: Northern Wild Monkshood (*Aconitum noveboracense*). Available at <http://www.fws.gov/midwest/endangered/plants/monkshoo.html>. Accessed 1/24/2014.

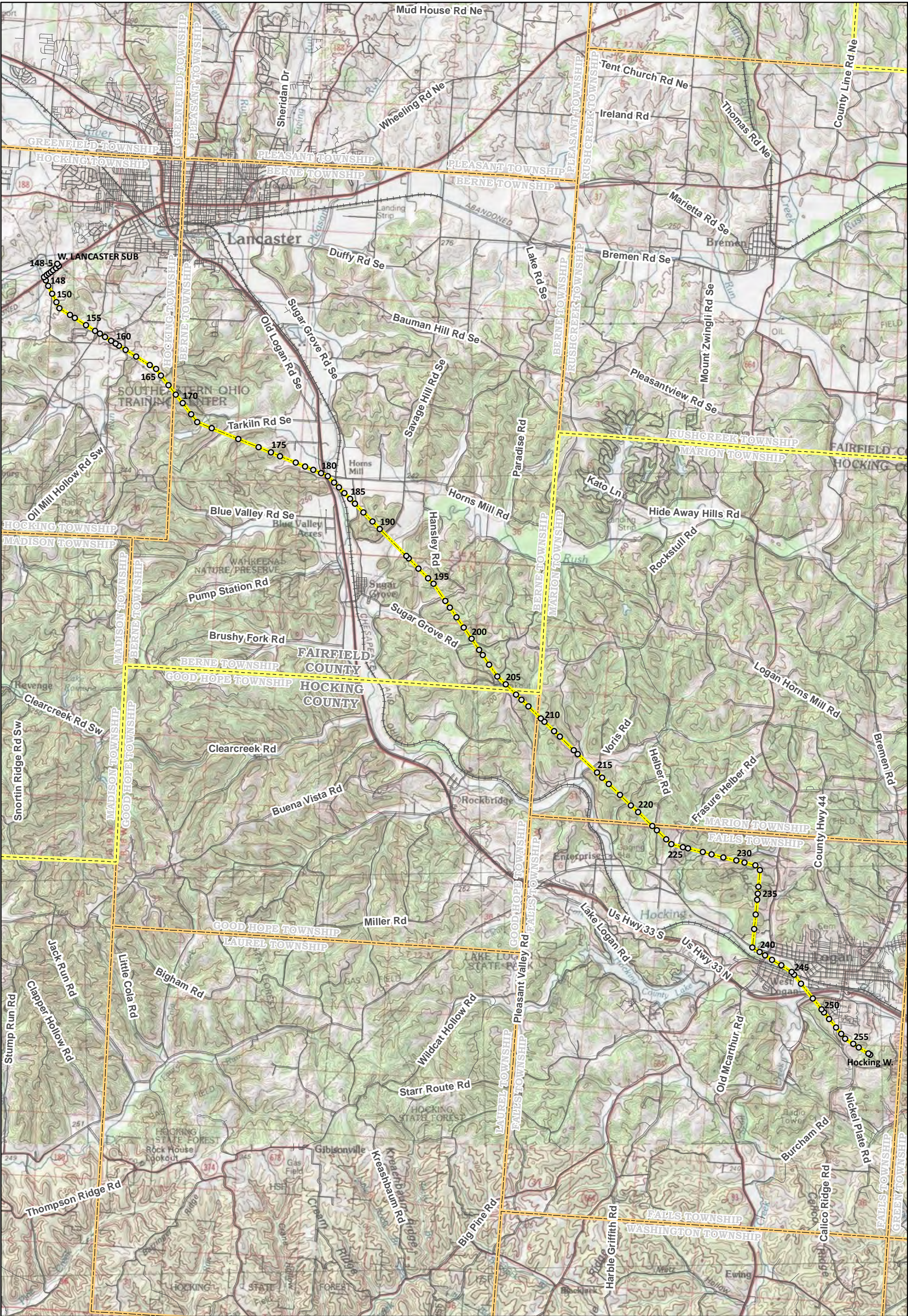
\_\_\_\_\_. 2014f. Endangered Species Fact Sheet: Running Buffalo Clover (*Trifolium stoloniferum*). Available at <http://www.fws.gov/midwest/endangered/plants/runningb.html>. Accessed 1/24/2014.

\_\_\_\_\_. 2014g. Endangered Species Fact Sheet: Small Whorled Pogonia (*Isotria medeoloides*). Available at <http://www.fws.gov/midwest/endangered/plants/smallwhorledpogoniafs.html>. Accessed 1/24/2014.

\_\_\_\_\_. 2014h. Endangered Species Fact Sheet: American Burying Beetle (*Nicrophorus americanus*). Available at <http://www.fws.gov/midwest/endangered/plants/smallwhorledpogoniafs.html>. Accessed 1/24/2014.

**FIGURE 1      PROJECT OVERVIEW: TOPOGRAPHIC MAP**





○ Structures

Hocking - West Lancaster Alignment

Roads

Railroads

Township Boundary

County Boundary

N  
W  
E  
S

1" = 7,500'

0 2,500 5,000 7,500

Feet

Figure 1  
Map - Topographic

The State of Ohio  
Hocking and Fairfield Counties  
Berne, Falls, Good Hope,  
Hocking and Marion Townships

NAD83  
Ohio State Plane South

Date: 1/22/2014  
Author: JPT  
MXD: 127705\_HockingWestLancaster\_31221.mxd

Hocking West Lancaster  
31221  
Project Overview

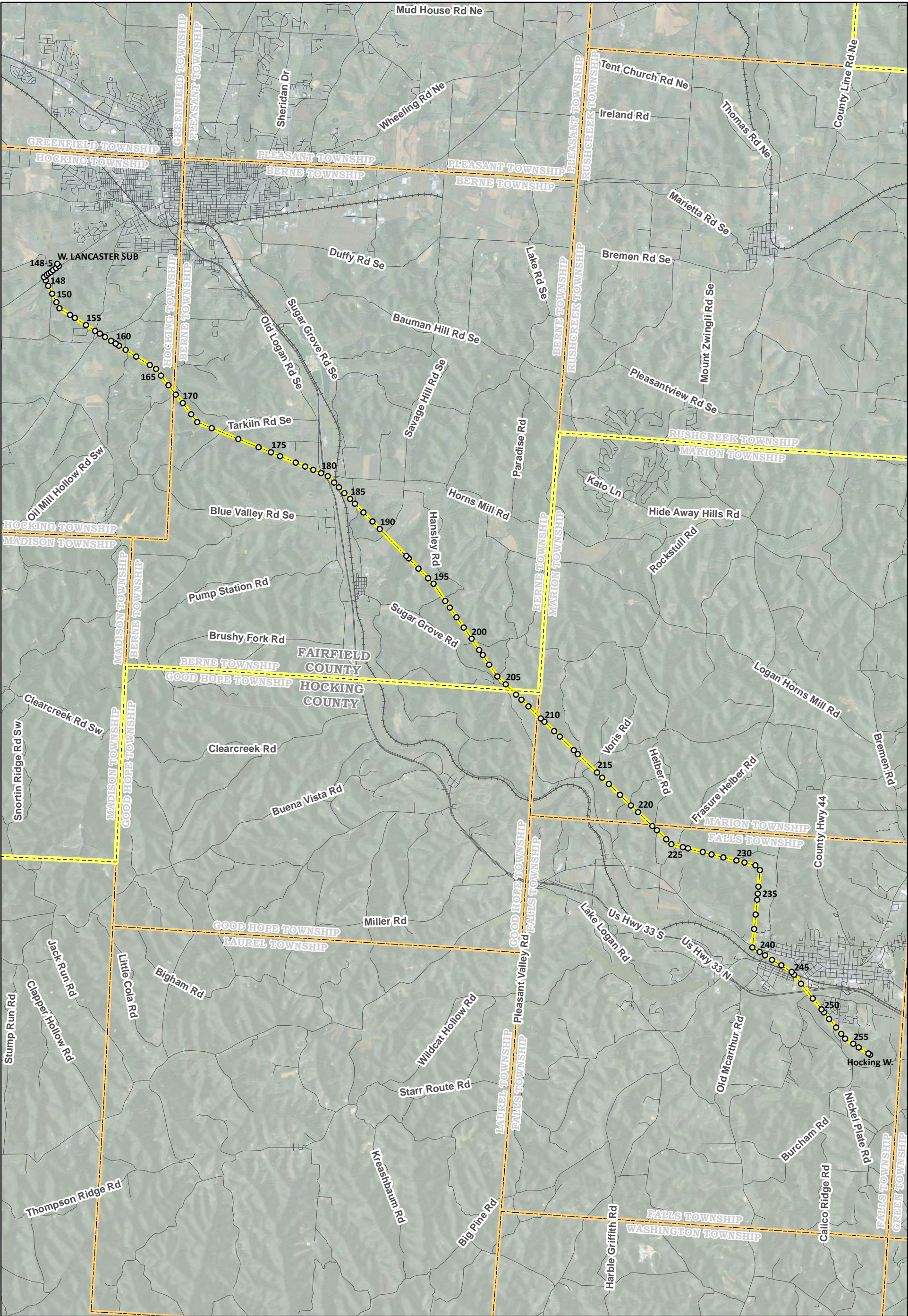
AEP AMERICAN  
ELECTRIC  
POWER

POWER  
ENGINEERS



**FIGURE 2      PROJECT OVERVIEW: AERIAL PHOTOGRAPHY MAP**





- Structures
- Hocking - West Lancaster Alignment
- Roads
- Railroads
- Township Boundary
- County Boundary

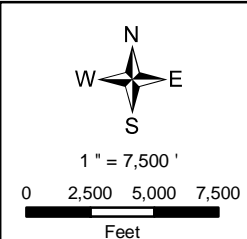


Figure 2  
Map - Aerial Photography

The State of Ohio  
Hocking and Fairfield Counties  
Berne, Falls, Good Hope,  
Hocking and Marion Townships

NAD83  
Ohio State Plane South

Date: 1/22/2014  
Author: JPT  
MXD: 127705\_HockingWestLancaster\_31221.mxd

Hocking West Lancaster  
31221  
Project Overview

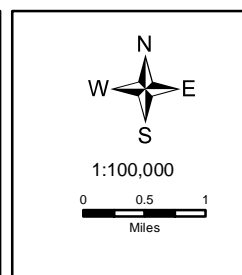
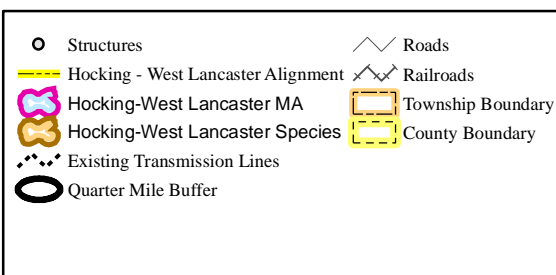
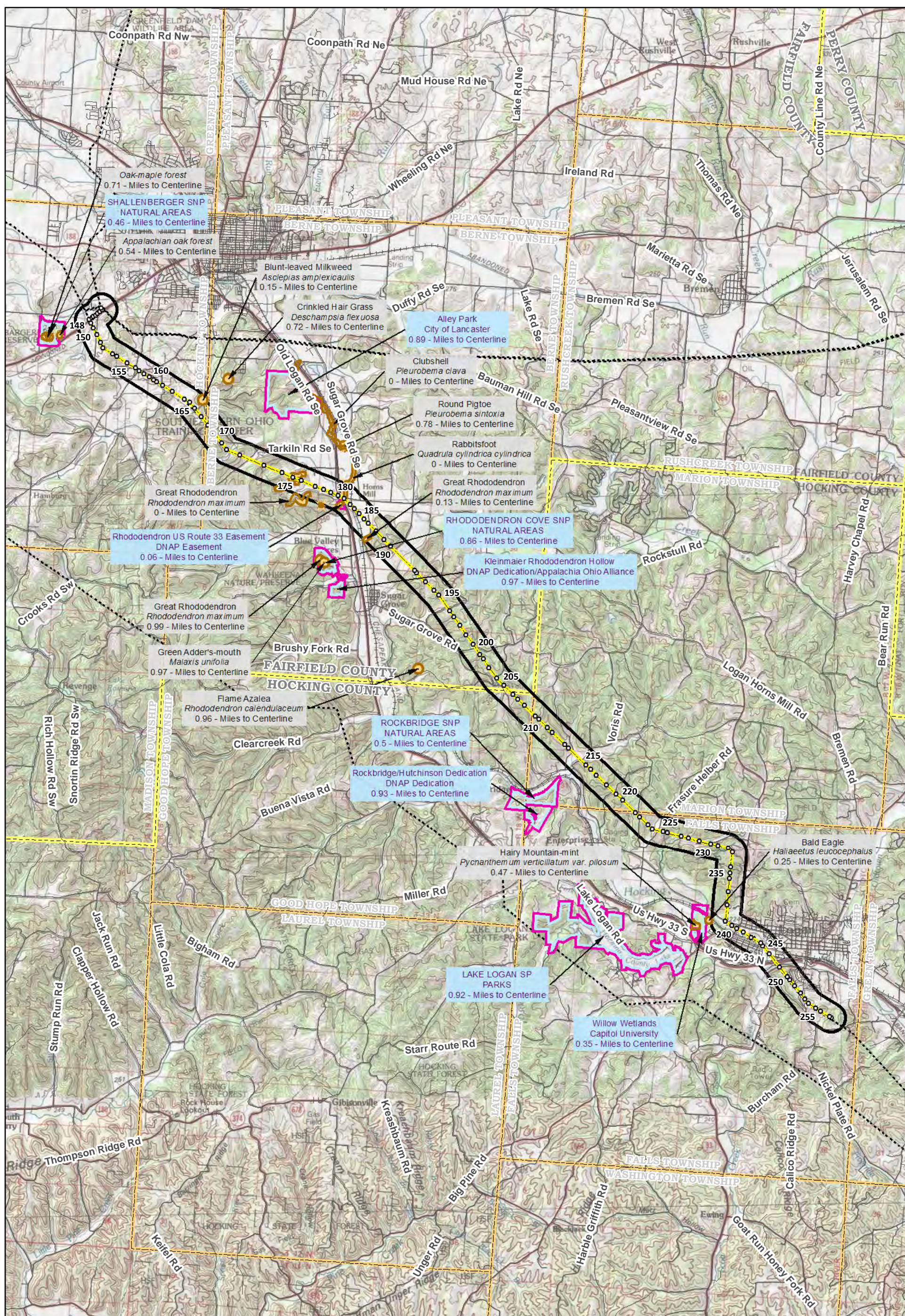
**AMERICAN ELECTRIC POWER**  
AEP: America's Energy Partner

**POWER ENGINEERS**



**FIGURE 3      ODNR NATURAL HERITAGE DATABASE SPECIES LOCATION MAP**





<p>Figure 3 ODNR Natural Heritage Database Species Location Map</p>
<p>The State of Ohio Hocking and Fairfield Counties Bernie, Falls, Good Hope, Hocking and Marion Townships</p>
<p>NAD83 Ohio State Plane South</p>
<p>Date: 1/30/2014 Author: JPT MXD: 127705, HockingW1 ancestor, 31221.mxd</p>

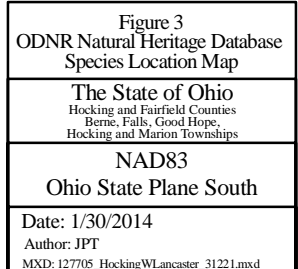
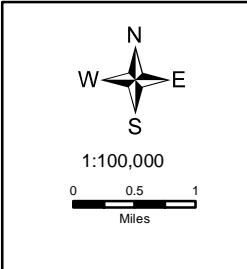
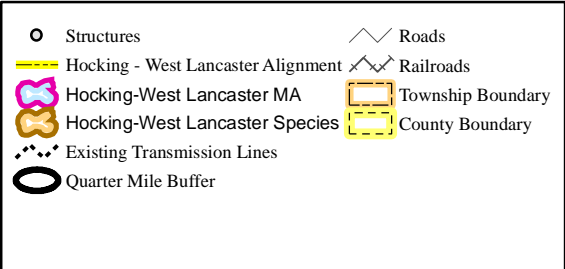
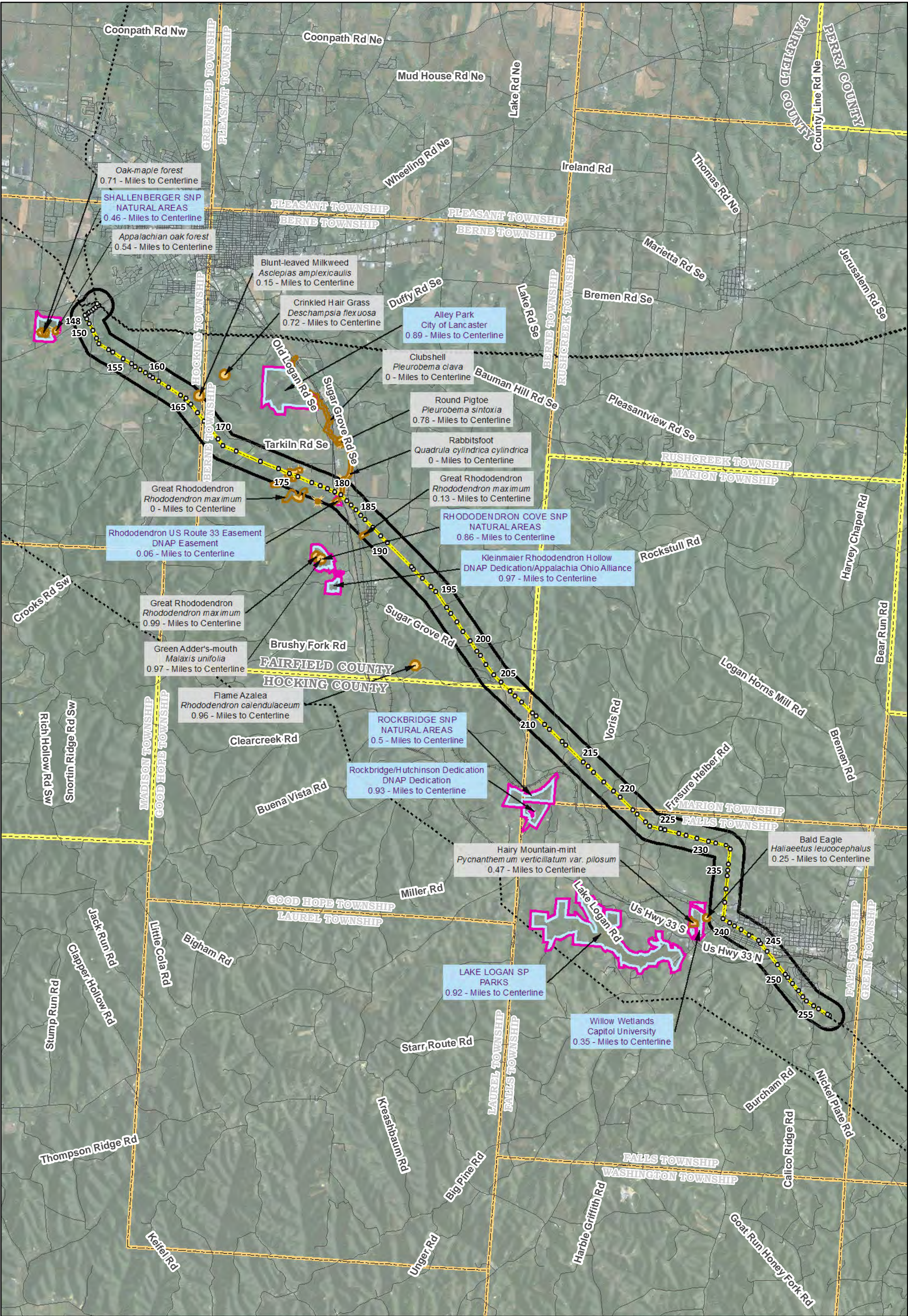
Hocking West Lancaster  
31221  
Species Location Map  
USGS Topo

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## **APPENDIX A    AGENCY CORRESPONDENCE**



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

**Ohio Division of Wildlife**  
*Scott Zody, Chief*  
2045 Morse Rd., Bldg. G  
Columbus, OH 43229-6693

December 17, 2013

Alison Pruett  
Power Engineers  
9097 Spoonbill Ridge Pl.  
Las Vegas, NV 89143

Dear Ms. Pruett

I have reviewed the Natural Heritage Database for the Hocking-West Lancaster Project including a one mile buffer based on the provided shape file. We have records for rare species and managed areas in your project area. I am attaching a shape file for the rare and endangered plants and animals, geologic features, high quality plant communities and animal assemblages. Fields included are scientific and common names, state and federal statuses and date of the most recent observation. State and federal statuses are defined as: E = endangered, T = threatened, P = potentially threatened, SC = species of concern, SI = special interest, FE = federal endangered, FT = federal threatened, FPE = federal potentially endangered, FC = federal candidate and FSC = federal species of concern, F = federal listing only. This data may not be published or distributed beyond the scope of the project description on the data request form without prior written permission of the Natural Heritage Program. I have also attached a shape file for managed areas that include state wildlife areas, nature preserves, parks and forests, national wildlife refuges, county metro parks, as well as sites owned by non-profit groups. Please be aware that the managed areas layer may not be complete. We are continually updating this layer as additional information becomes available to us.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. 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 we inventory all types of plant communities, we only maintain records on the highest quality areas.

This letter only represents a review of rare species and natural features data within the Ohio Natural Heritage Database. It does not fulfill coordination under the National Environmental Policy Act (NEPA) or the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S. C. 661 et seq.) and does 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.

Please contact me at 614-265-6452 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Greg Schneider".

Greg Schneider, Administrator  
Ohio Natural Heritage Program





January 20, 2014

ENERGY

FACILITIES

COMMUNICATIONS

ENVIRONMENTAL

Ohio Department of Natural Resources  
Office of Real Estate  
Attn: John Kessler  
2045 Morse Rd, Building E-2  
Columbus, Ohio 43229-6693

Subject: Hocking – West Lancaster 138 kV Transmission Line Rebuild, Hocking and  
Fairfield Counties, Ohio

Mr. Kessler,

American Electric Power (AEP) is proposing to rebuild the Hocking – West Lancaster 138 kV transmission line. To date, we have requested data from the Ohio Natural Heritage Program and conducted field reviews to assess the potential for habitat suitability within the project area. We are writing to request your concurrence with our findings and request a response for inclusion in our Letter of Notification filings.

The project is located in Hocking and Fairfield counties, Ohio within an existing, cleared corridor. The line runs from the Hocking Substation on Keller Road south of the town of Logan for 19.3 miles northwest to the West Lancaster Substation on Cincinnati-Zanesville Road southwest of Lancaster (see attached map). Plans are to remove 118 existing structures and install 115 new self-supporting galvanized steel structures. An existing laydown yard that is currently being utilized for other projects will be used for this project. It is anticipated that construction for the access roads would be initiated in June 2014 followed by rebuild of the transmission line in September 2014.

On December 17, AEP received the results of a request to the Ohio Natural Heritage Program. It was reported that a bald eagle nest had been recorded within 1 mile of our project area. It is located approximately 0.3 mile from the project right-of-way. It is not anticipated that the nest would be directly impacted by construction activities.

The Ohio Natural Heritage Program reported the federally and state endangered clubshell (*Pleurobema clava*) and federally threatened and state threatened rabbitsfoot (*Quadrula cylindrica cylindrica*) have been recorded within 1 mile of our project area. A search of the Ohio Natural Heritage Program website found that these and other listed bivalve and fish species are known to occur within Hocking and Fairfield counties. These are both aquatic species and there are no plans to directly disturb waterways or other habitat of these species. Additionally, all spoils will be contained to avoid contamination of waterways. Compliance with a Stormwater Pollution Prevention Plan will further minimize potential for impacts to waterways. As a result, it is anticipated there will be no impacts to these species.

Ohio Department of Natural Resources  
January 20, 2014  
Page 2

The Ohio Natural Heritage Program also reported the state endangered flame azalea (*Rhododendron calendulaceum*) and state threatened giant rhododendron (*Rhododendron maximum*) and hairy mountain mint (*Pycnanthemum verticillatum* var. *pilosum*). POWER Engineers biologists conducted a field review and found habitat suitable for rhododendron, but did not record any rhododendron. Potentially suitable habitat for hairy mountain mint was not documented.

Based on a review of the Ohio Natural Heritage Database website, it is known that the federally and state endangered Indiana bat (*Myotis sodalis*) has the potential to occur in Hocking and Fairfield counties. Field review by POWER Engineers biologists identified 16 roost trees suitable for Indiana bats in the vicinity of the right-of-way. Minimal clearing is anticipated within the existing corridor. However, trimming may be required for access roads and additional clearance adjacent to the existing right-of-way. The trees identified as suitable for the Indiana bat will only be cleared, if necessary, between the months of October and March.

Based on the above information, AEP does not anticipate the rebuild of the Hocking – West Lancaster transmission line will result in impacts to protected species. We request that you inform us of your concurrence or any guidance you can provide should you not concur with our findings.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Banaitis', with a stylized flourish at the end.

Michael Banaitis, PWS, CPESC  
Environmental Scientist  
POWER Engineers, Inc.

Enclosure(s): Hocking West Lancaster 31221 Map  
c: DMS: 127705/PER-01



January 20, 2014

ENERGY

FACILITIES

COMMUNICATIONS

ENVIRONMENTAL

U.S. Fish and Wildlife Service  
Attn: Mary Knapp, PhD  
Field Supervisor  
4625 Morse Rd, Suite 104  
Columbus, Ohio 43230

Subject: Hocking – West Lancaster 138 kV Transmission Line Rebuild, Hocking and  
Fairfield Counties, Ohio

Dr. Knapp,

American Electric Power (AEP) is proposing to rebuild the Hocking – West Lancaster 138 kV transmission line. To date, we have requested data from the Ohio Natural Heritage Program and conducted field reviews to assess the potential for habitat suitability within the project area. We are writing to request your concurrence with our findings and request a response for inclusion in our Letter of Notification filings.

The project is located in Hocking and Fairfield counties, Ohio within an existing, cleared corridor. The line runs from the Hocking Substation on Keller Rd south of the town of Logan for 19.3 miles northwest to the West Lancaster Substation on Cincinnati-Zanesville Road southwest of Lancaster (see attached map). Plans are to remove 118 existing structures and install 115 new self-supporting galvanized steel structures. An existing laydown yard that is currently being utilized for other projects will be used for this project. It is anticipated that construction for the access roads would be initiated in June 2014 followed by rebuild of the transmission line in September 2014.

On December 17, AEP received the results of a request to the Ohio Natural Heritage Program. It was reported that a bald eagle nest had been recorded within 1 mile of our project area. It is located approximately 0.3 mile from the project right-of-way. It is not anticipated that the nest would be directly impacted by construction activities. The Ohio Natural Heritage Program also reported the federally endangered clubshell (*Pleurobema clava*) and federally threatened rabbitsfoot (*Quadrula cylindrica cylindrica*) have been recorded within 1 mile of our project area. These are both aquatic species and there are no plans to directly disturb waterways or other habitat of these species. Additionally, all spoils will be contained to avoid contamination of waterways. Compliance with a Stormwater Pollution Prevention Plan will further minimize potential for impacts to waterways. As a result, it is anticipated there will be no impacts to these species.

Based on a review of ECOS and IPaC, it is known that the federally endangered Indiana bat (*Myotis sodalis*) and federally proposed endangered northern long-eared bat (*Myotis septentrionalis*) have the potential to occur in vicinity of the project area. Field review by POWER Engineers biologists identified 16 roost trees suitable for Indiana bats in the vicinity of the right-of-way. Minimal clearing is anticipated within the existing corridor. However, trimming may be required for access roads and additional clearance adjacent to

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the existing right-of-way. The trees identified as suitable for the Indiana bat will only be cleared, if necessary, between the months of October and March.

The proposed project is a rebuild within an existing cleared corridor. Therefore, minimal impacts are anticipated for the federally endangered running buffalo clover (*Trifolium stoloniferum*), American burying beetle (*Nicrophorus americanus*); federally threatened northern wild monkshood (*Aconitum noveboracense*) and small whorled pogonia (*Isotria medeoloides*).

Based on the above information, AEP does not anticipate the rebuild of the Hocking – West Lancaster transmission line will result in impacts to federally protected species. We request that you inform us of your concurrence or any guidance you can provide should you not concur with our findings.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Banaitis', with a stylized flourish at the end.

Michael Banaitis, PWS, CPESC  
Environmental Scientist  
POWER Engineers, Inc.

Enclosure(s): Hocking West Lancaster 31221 Map  
c: DMS: 127705/PER-01



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

## Office of Real Estate

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March 7, 2014

Michael Banaitits  
POWER Engineers, Inc.  
303 U.S. Route 1  
Freeport, Maine 04032

**Re:** 14-064; Hocking-West Lancaster 438 kV Transmission Line Rebuild, Hocking and Fairfield Counties, Ohio.

**Project:** American Electric Power (AEP) is proposing to rebuild the Hocking – West Lancaster 138 kV transmission line. The project involves the removal of 118 existing structures and installation of 115 new self-supporting galvanized steel structures.

**Location:** The project is located in Hocking and Berne Townships, Fairfield County and Good Hope, Marion, and Falls Townships, Hocking 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.

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

The DOW recommends that impacts to wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: Shagbark hickory (*Carya ovata*), Shellbark hickory (*Carya laciniosa*), Bitternut hickory (*Carya cordiformis*), Black ash (*Fraxinus nigra*), Green ash (*Fraxinus pennsylvanica*), White ash (*Fraxinus americana*), Shingle oak (*Quercus imbricaria*), Northern red oak (*Quercus rubra*), Slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), Eastern cottonwood (*Populus deltoides*), Silver maple (*Acer saccharinum*), Sassafras (*Sassafras albidum*), Post oak (*Quercus stellata*), and White oak (*Quercus alba*). Indiana bat habitat consists of suitable trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or

riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. If suitable trees occur within the project area, these trees should be conserved. If suitable habitat occurs on the project area and trees must be cut, cutting must occur between October 1 and March 31. If suitable trees must be cut during the summer months, a net survey must be conducted between June 15 and July 31, prior to cutting. Net surveys shall incorporate either two net sites per square kilometer of project area with each net site containing a minimum of two nets used for two consecutive nights, or one net site per kilometer of stream within the project limits with each net site containing a minimum of two nets used for two consecutive nights. If no tree removal is proposed, the project is not likely to impact this species.

As already stated in the project documentation, the project is within the range of the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, and the rabbitsfoot (*Quadrula cylindrical cylindrical*), a state endangered mussel. Due to there being no in-water work planned, this project is not likely to impact these species.

The project is within a county where current records exist for the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federal candidate snake species. The eastern massasauga uses a range of habitats including wet prairies and wetlands, as well as drier upland habitat. Due to the location, the type of habitat along the project route, and the type of work proposed, this project is not likely to impact this species.

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

The project is within the range of the American burying beetle (*Nicrophorus americanus*) a state and federal endangered beetle. Due to the habitat requirements of this species, the project is not likely to impact this species.

The project is within the range of the timber rattlesnake (*Crotalus horridus horridus*), a state endangered species, and a federal species of concern. Due to the location, the type of habitat along the project route, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the Uhler's sundragon (*Helocordulia uhleri*), a state endangered dragonfly. Impacts to stream bottom substrates should be avoided and minimized to avoid impacts to this species.

The project is within the range of the grizzled skipper (*Pygus centaureae wyandot*), a state endangered butterfly. Due to the type of habitat along the project route, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. A statewide survey has not been completed for this species. A lack of records does not indicate the species is absent from the area. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction must be avoided in this habitat during the species' nesting period of April 15 to July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.



The ODNR Natural Heritage Database has no records, other than those already mentioned for rare or endangered species along this project route. We are unaware of any, other than those already mentioned, unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges or other protected natural areas within the project area. Our inventory program does not provide a complete survey of Ohio wildlife, and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

**Natural Areas:** The Division of Natural Areas and Preserves (DNAP) has the following comments.

The current Hocking- West Lancaster transmission line bisects a population of the state threatened *Rhododendron maximum* in central portion of section 29 of Berne Township, Fairfield County. While this species is not expected to occur within the current transmission line corridor, the population could be impacted if any additional tree and shrub clearing is completed. DNAP recommends that no additional clearing occur in wooded areas of Sec. 29 of Berne Township to reduce impacts to the state significant *Rhododendron maximum* population.

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

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

**Commission of Ohio Docketing Information System on**

**3/20/2014 3:22:32 PM**

**in**

**Case No(s). 14-0144-EL-BLN**

Summary: Letter of Notification Hocking West Lancaster 138 kV Transmission Line Rebuild Project (Part 8 of 9) electronically filed by Mr. Yazen Alami on behalf of AEP Ohio Transmission Company