



Legal Department

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July 25, 2017

Chairman Asim Z. Haque
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215-3979

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Docketing Division
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Hector Garcia
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**Re: Supplemental Information
PUCO Case No. 17-0804-EL-BLN
Ironman Station Project**

Dear Chairman Haque,

In satisfaction of Condition 2 of the Staff Report of Investigation issued July 18, 2017 for the above-referenced project, enclosed is the following:

- (a) Ohio Department of Natural Resources' Response to the Request for Technical Assistance Regarding Threatened and Endangered Species and Critical Habitat, dated July 21, 2017 ("ODNR Response").

AEP Ohio Transmission Company has provided a copy of the ODNR Response to the staff of the Ohio Power Siting Board.

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

Respectfully submitted,

/s/ Hector Garcia
Hector Garcia

cc. John Jones, Counsel OPSB Staff
Jon Pawley, OPSB Staff



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldrige, Chief
2045 Morse Road – Bldg. E-2
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July 21, 2017

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

Re: 17-378; AEP Heppner South Ironman Substation Project, Request for Technical Assistance Regarding Threatened and Endangered Species and Critical Habitat

Project: The proposed Project involves the construction of the Heppner South Ironman Substation.

Location: The proposed project is located in Lick Township, Jackson County, Ohio.

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

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

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

The project is within the range of the Ohio lamprey (*Ichthyomyzon bdellium*), a state endangered fish, and the lake chubsucker (*Erimyzon sucetta*) a state threatened fish. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

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

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

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

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

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

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

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

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

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Case No(s). 17-0804-EL-BLN

Summary: Correspondence submitting Supplemental Information electronically filed by Mr. Hector Garcia on behalf of AEP Ohio Transmission Company