



Legal Department

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

February 28, 2018

Ms. Barcy F. McNeal
Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Hector Garcia
Christen M. Blend
Senior Counsel –
Regulatory Services
(614) 716-3410 (P)
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hgarcia1@aep.com
cmblend@aep.com

**RE: In the matter of the Construction Notice Application of AEP Ohio Transmission Company, Inc. for a Certificate of Environmental Compatibility and Public Need for the Poston-Lick 138 kV Transmission Line Extension Project
Case No. 18-253-EL-BNR**

Dear Ms. McNeal:

Attached please find a copy of AEP Ohio Transmission Company, Inc.'s ("AEP Ohio Transco") Construction Notice application for the above-referenced project, which is being submitted pursuant to O.A.C. 4906-6-05.

Copies of this filing will also be submitted to the executive director or the executive director's designee and provided to the OPSB Staff via electronic message.

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

Respectfully submitted,

/s/ Christen M. Blend

Christen M. Blend (0086881), Counsel of Record
Hector Garcia (0084517)
Counsel for AEP Ohio Transmission Company, Inc.

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

Construction Notice For Poston-Lick 138 kV Transmission Line Extension Project



Case No. 18-0253-EL-BNR

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

Submitted by:
AEP Ohio Transmission Company, Inc.

February 28, 2018

CONSTRUCTION NOTICE

AEP Ohio Transmission Company, Inc.'s Poston-Lick 138kV Transmission Line Extension Project

4906-6-05

AEP Ohio Transmission Company, Inc. ("AEP Ohio Transco") provides the following information to the Ohio Power Siting Board ("OPSB") pursuant to Section 4906-6-05 of the Ohio Administrative Code.

4906-6-05(B) General Information

B(1) Project Description

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

AEP Ohio Transco is proposing the Poston-Lick 138kV Transmission Line Extension Project ("Project"), located between the cities of Wellston and Jackson, in Coal Township, Jackson County, Ohio. The Project includes the construction of two new steel pole structures within the right of way of the existing Poston-Lick 138 kV transmission line, with a 0.03 mile line extension connecting to the proposed Rhodes Station. The Project will be located on an easement owned by Ohio Power Company, as part of the existing Poston-Lick 138 kV line ROW, and property purchased by AEP Ohio Transco for the proposed Rhodes Station. Figure 1 shows the proposed Project area.

The Project meets the requirements for a Construction Notice ("CN") because it is within the types of projects defined by (1)(a) 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:

(a) Line(s) not greater than 0.2 miles in length.

The PUCO Case Number for this project is 18-0253-EL-BNR.

B(2) Statement of Need

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

The Project is required to provide service to the proposed Rhodes Station. Rhodes Station is being established as a result of a PJM Interconnection, LLC ("PJM") single contingency criteria violation after the connection of the new City of Jackson delivery point (Ironman Switching Station) to the Lick-Ross 69 kV circuit. Under single contingency, the voltage at Ironman will drop to approximately 65 percent of normal (PJM minimum is 92 percent) and overload the Lick-Ross circuit to 130 percent of its summer emergency rating (PJM maximum is 100 percent). Rhodes Substation will supply a third transmission source into the

Lick-Ross 69 kV circuit via a new 138/69 kV transformer, alleviating the PJM criteria violation. The Project was submitted at the PJM Interconnection Subregional Regional Transmission Expansion Plan ("RTEP") Committee-Western meeting as a baseline project on March 24, 2017, and was assigned a PJM reference number of b2885.2.

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 the existing transmission line and proposed Rhodes Station.

B(4) Alternatives Considered

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

The Project will be located within Ohio Power Company right-of-way (ROW) and property owned by AEP Ohio Transco, therefore, no significant alternatives were studied as part of the Project.

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.

Letters will be sent to affected property owners, which include AEP Ohio Transco and Ohio Power Company, no other property owners or tenants will be affected. AEP Ohio Transco maintains a website (<http://aeptransmission.com/ohio/>) on which an electronic copy of this CN will be available. A paper copy of the CN will be served to the public library in each political subdivision affected by this Project.

B(6) Construction Schedule

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

Construction of the Project is planned to begin in the summer of 2018, and the anticipated in-service date will be approximately October 2018.

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 provides the proposed Project area on a map of 1:24,000-scale. Figure 1 shows the project area on the United States Geologic Service (USGS) 7.5-minute topographic map of the Wellston (1977) quadrangle. Figure 2 shows the Project area on recent aerial photography, as provided by ESRI ArcMap Imagery and Digital Globe. To visit the Project location from Columbus, take US-23S toward Circleville for approximately 40 miles. Continue onto US-35E/US-50E toward Jackson/Athens for approximately 28 miles, take the exit for OH-32/OH-124 and turn left. After 3.0 miles, turn left onto Rice Road, then turn right onto Fairgreens Road. Drive 1.5 miles and turn left. The existing Poston-Lick 138 kV transmission line, is located approximately 600 feet west of Fairgreens Road. The approximate address is 3103 Fairgreens Road, Jackson, OH 45640 at latitude 39.0824, longitude -82.5492.

B(8) Property Agreements

The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

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

B(9) Technical Features

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

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

The Project will involve the construction of two (2) steel monopole dead end structures. The steel pole structure will stand approximately 90 feet tall and operate as 138 kV. The Project will utilize 765,000 ACSR conductors and a shield wire will be installed to protect from lightning surges.

A sketch of the proposed structure type is included as Figures 3.

B(9)(b) Electric and Magnetic Fields

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

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

B(9)(b)(ii) Design Alternatives

A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

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

B(9)(c) Project Cost

The estimated capital cost of the project.

The capital cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$750,000.

B(10) Social and Economic Impacts

The applicant shall describe the social and ecological impacts of the project:

B(10)(a) Operating Characteristics

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

The Project is within Coal Township in Jackson County, Ohio. An aerial photograph of the Project vicinity is provided as Figure 2. The land use within the vicinity of the Project is open field and industrial. The 0.03-mile long transmission line to the proposed Rhodes Station is completely within Ohio Power Company ROW and AEP Ohio Transco property.

B(10)(b) Agricultural Land Information

Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

The Project is located within Ohio Power Company ROW and AEP Ohio Transco property and is approximately 0.4 acres. The Jackson County auditor was contacted regarding agricultural district lands on February 8, 2018. The Project is not located on property registered as agricultural district land.

B(10)(c) Archaeological and Cultural Resources

Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential

disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Project area was the focus of two previous Phase I Cultural Resource Management Investigation completed in 2015, for application 16-0020-EL-BLN, (the Poston-Lick 138 kV rebuild project), and 2017, as part of application 17-0805-EL-BLN, Appendix B (Rhodes Station Project). Neither investigation resulted in the identification of any cultural materials that were significant within or near the Project area. Both of the previous surveys were reviewed by the OHC and OPSB. It is the opinion of AEP's consultant that no further cultural resource management work is necessary for the proposed Project (Appendix B).

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

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

Once final design of the project is complete, including identification of access roads, a Notice of Intent will be filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHC000004, if disturbance exceeds one acre. There are no other known local, state, or federal requirements that must be met prior to commencement of the proposed 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 Project was previously coordinated in May of 2017 with ODNR and USFWS regarding special status species as part of application 17-0807-EL-BLN (Rhodes-Heppner Switch 138 kV Transmission Line Project) and application 17-0805-EL-BLN (Rhodes Station). No impacts to threatened or endangered species are expected. Tree clearing is not anticipated for the Project, however, if necessary, the USFWS recommends seasonal tree clearing to avoid adverse effects to the endangered Indiana bat and threatened northern long-eared bat. A copy of the coordination for the Project is included as Appendix A.

B(10)(f) Areas of Ecological Concern

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

The Project area was the focus of two previous ecological surveys conducted in May and June of 2017, as part of application 17-0805-EL-BLN (Rhodes Station) and 17-0807-EL-BLN (Rhodes-Heppner Switch 138 kV Transmission Line Project). Two (2) palustrine emergent wetlands, one (1) ephemeral stream, and one (1) jurisdictional ditch were identified within the study area vicinity. Impacts to these features are not anticipated.

The FEMA Flood Insurance Rate Map was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map number 39079Co160K). Based on this mapping, no mapped FEMA floodplains are located in the Project Area. Therefore, a floodplain permit will not be required for this Project.

During consultation with the ODNR, in a letter dated August 22, 2017, the ODNR indicated that the Coalton Wildlife Area (managed by the ODNR Division of Wildlife [DOW]) is located within a one-mile radius of the Project area. However, a search of ODNR public lands data revealed that the Coalton Wildlife Area is located approximately 4.3 miles to the northwest of the Project Area. Furthermore, Buckeye Furnace is identified as a historic site by the Ohio Historical Society and is located approximately 1.0 mile to the east of the Project Area. The Buckeye Furnace property is owned and managed by Buckeye Furnace Mining, Inc. and is listed as having an agreement with the ODNR DOW for use as a public hunting area. The Coalton Wildlife Area and Buckeye Furnace property will not be impacted by the Project. The USFWS responded in an email dated June 2, 2017 (Project ID 03E15000-2017-TA-1327) indicating that there are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project Area.

B(10)(g) Unusual Conditions

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

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

Appendix A Wetland Delineation and Stream Assessment Report



February 16, 2018

American Electric Power
Attn: Alicia Cross, Transmission Line Siting Specialist
700 Morrison Road
Gahanna, Ohio 43230

RE: Ecological Survey and Rare, Threatened, and Endangered Species Review for the Poston-Lick 138 kV Line Extension Project in Coal Township, Jackson County, Ohio

GAI Consultants, Inc. (GAI), on behalf of American Electric Power (AEP), conducted a review of ecological resources as well as state- and federally-listed threatened and endangered species in the vicinity of the Poston-Lick 138 kV Line Extension Project (Project) in Coal Township, Jackson County, Ohio. The proposed Project involves the installation of two (2) new structures to connect the Poston-Lick 138 kilovolt (kV) transmission line with the proposed Rhodes Substation. As part of this comparative review, it was determined that the Project area is located entirely within the footprint of two previously surveyed AEP projects; the Rhodes Substation Project and Heppner-Rhodes 138 kV Transmission Line Project. The Project location, including all previously surveyed areas, is shown on the attached map (Attachment 1).

Ecological surveys within the Rhodes Substation study area were completed on May 30 and June 7, 2017. One (1) palustrine emergent (PEM) wetland and one (1) proposed jurisdictional ditch were identified within the study area in the vicinity of the Poston-Lick 138 kV extension. Impacts to these features are not anticipated.

Ecological surveys within the Heppner-Rhodes 138 kV study area were completed on May 30, June 7, and July 17-19, 2017. One (1) PEM wetland and one (1) ephemeral stream segment were identified within the study area in the vicinity of the Poston-Lick 138 kV extension. Impacts to these features are not anticipated.

Informal consultation with the Ohio Department of Natural Resources (ODNR) and United States Fish and Wildlife Service (USFWS) for the Rhodes Substation Project was submitted on May 12, 2017. The ODNR responded in a letter dated August 22, 2017 (Project ID 17-394) indicating that the Coalton Wildlife Area (managed by the ODNR Division of Wildlife [DOW]) is located within a one-mile radius of the Project Area. However, a search of ODNR public lands data revealed that the Coalton Wildlife Area is located approximately 4.3 miles to the northwest of the Project Area. Furthermore, Buckeye Furnace is identified as a historic site by the Ohio Historical Society and is located approximately 1.0 mile to the east of the Project Area. The Buckeye Furnace property is owned and managed by Buckeye Furnace Mining, Inc. and is listed as having an agreement with the ODNR DOW for use as a public hunting area. The Coalton Wildlife Area and Buckeye Furnace property will not be impacted by the Project. The USFWS responded in an email dated June 2, 2017 (Project ID 03E15000-2017-TA-1327) indicating that there are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project Area. The USFWS recommends seasonal tree clearing to avoid adverse effects to the endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*). Consultation with the ODNR and USFWS for the Rhodes Substation Project is provided in Attachment 2.

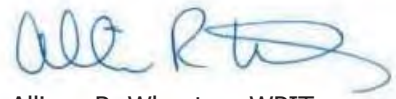
Informal consultation with the ODNR and USFWS for the Heppner-Rhodes 138 kV Transmission Line Project was submitted on May 11, 2017. The ODNR responded in a letter dated October 20, 2017 (Project ID 17-638) indicating that the Coalton Wildlife Area is located within a one-mile radius of the Project Area. The ODNR also indicated that the Cerulean Warbler (*Setophaga cerulea*), a state and federal species of concern, has records within a one-mile radius of the Project Area. However, impacts to the nesting Cerulean Warbler are not anticipated as tree clearing is planned to be completed outside of the species' nesting season. The Project is also located within the range of the following state listed species: little spectaclecase (*Villosa lianosa*), Ohio lamprey (*Ichthyomyzon bdellium*), lake chubsucker (*Erimyzon sucetta*), timber rattlesnake (*Crotalus horridus horridus*), Kirtland's snake (*Clonophis kirtlandii*),

mud salamander (*Pseudotriton montanus*), and black bear (*Ursus americanus*). Impacts to these indigenous aquatic species and their habitat are not anticipated as no in-stream work is proposed. The ODNR also stated that impacts to the timber rattlesnake, Kirtland's snake, mud salamander, and black bear are not anticipated due to the Project location, types of habitat along the Project route or within the vicinity, and/or the mobility of the species. The USFWS responded in an email dated June 2, 2017 (Project ID 03E15000-2017-TA-1327) indicating that there are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project Area. The USFWS recommends seasonal tree clearing to avoid adverse effects to the endangered Indiana bat and threatened northern long-eared bat. Consultation with the ODNR and USFWS for the Rhodes Substation Project is provided in Attachment 2.

It is GAI's opinion that ecological surveys for the Poston-Lick 138 kV Line Extension Project are complete and no further coordination with the ODNR or USFWS is necessary.

Sincerely,

GAI Consultants, Inc.



Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

ARW/kea

Attachments: Attachment 1 (Project Map)
Attachment 2 (ODNR/USFWS Correspondence)

ATTACHMENT 1
PROJECT MAP



REFERENCES: ESRI WORLD IMAGERY, DIGITALGLOBE, 2015, ACCESSED 02/2018, WORLD TRANSPORTATION, ESRI, DELORME, HERE, MAPMYINDIA, TOMTOM, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY, OBTAINED THROUGH ESRI ARCGIS ONLINE, ACCESSED 02/2018.

- Proposed Extension Area
- Proposed Substation
- Heppner-Rhodes Study Area
- Rhodes Substation Study Area

- LEGEND**
- 69kV Existing Transmission Line
 - 138kV Existing Transmission Line
 - Culvert
 - Proposed Jurisdictional Ditch
 - Stream
 - Open-Ended Boundary
 - Wetland

0 100 200 400 Feet

**POSTON-LICK
138kV EXTENSION
AMERICAN ELECTRIC POWER**

DRAWN BY: EFJ
CHECKED: SWW

DATE: 2/16/2018
APPROVED:

Z:\Energy\2017\C170352.00 - AEP Ohio Projects\GIS\MXD\Rhodes_Sub\Misc\2018_02_15_Poston_Lick_Tie-in\Poston_Lick_Tie-in_2018_02_16.mxd

ATTACHMENT 2
ODNR/USFWS CORRESPONDENCE



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

August 22, 2017

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

Re: 17-394; AEP Rhodes Substation Project, Request for Technical Assistance Regarding Threatened and Endangered Species and Critical Habitat

Project: The proposed project involves the construction of the Rhodes substation.

Location: The proposed project is located in Coal 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 the following record at or within a one-mile radius of the project area:

Coalton Wildlife Area – ODNR Division of Wildlife

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

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 to include: 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 of sufficient size, 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 of sufficient size, this 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. 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 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.

John Kessler
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
John.Kessler@dnr.state.oh.us



Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

May 11, 2017
Project C170352.09

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
Rhodes Substation Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Jackson 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 Rhodes Substation Project (Project) in Jackson County, Ohio. As part of this request, please provide information specific to any threatened and endangered bats. GAI is also requesting the locations of any known golden or bald eagle nests in the area.

The proposed Project involves the construction of the Rhodes Substation (approximately two acres).

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists primarily of old field habitat. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 330.324.9148 or via email at a.wheaton@gaiconsultants.com if you have any questions or require further information.

Sincerely,
GAI Consultants, Inc.

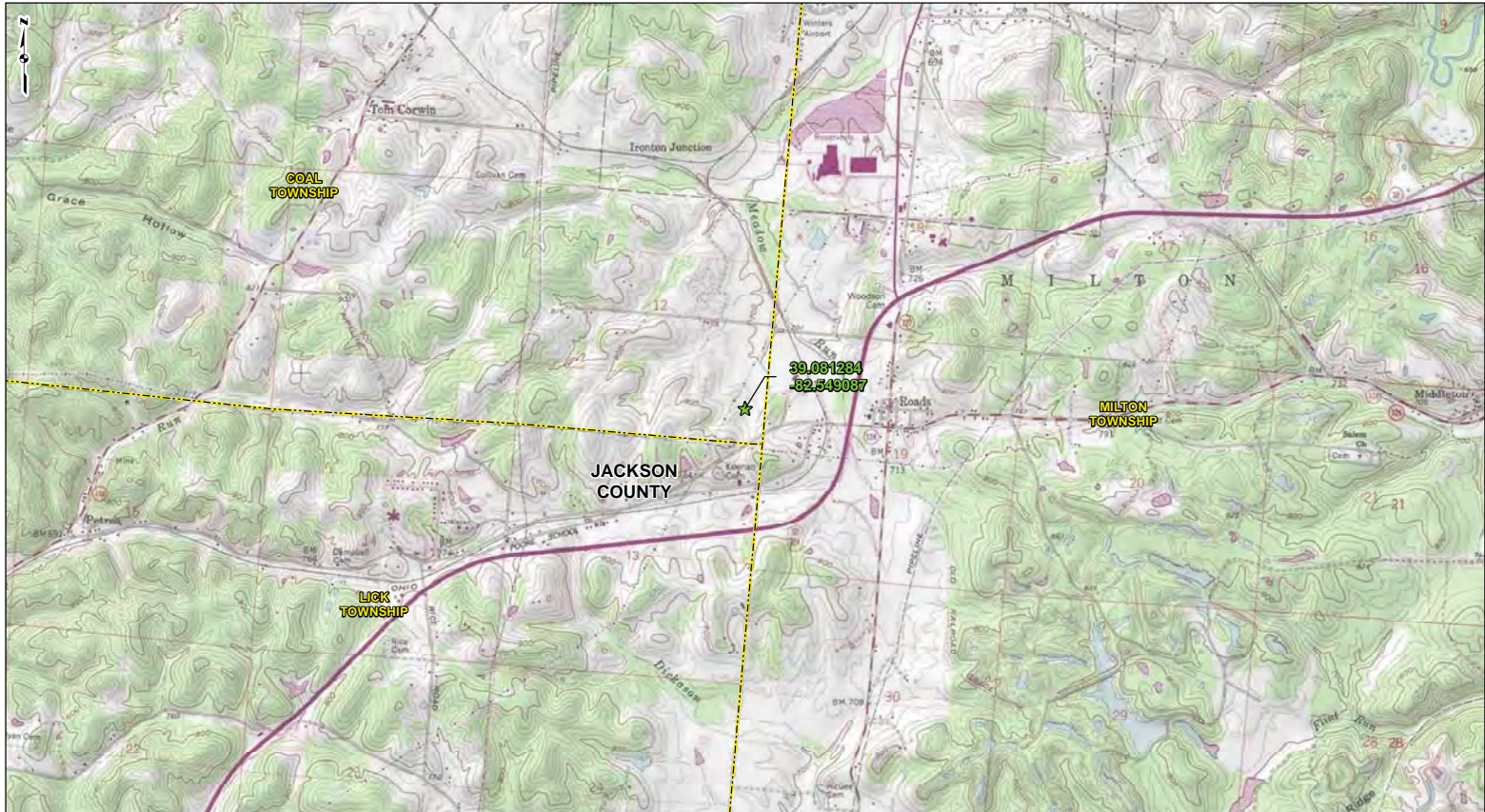
A handwritten signature in blue ink, appearing to read 'Allison R. Wheaton'.

Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

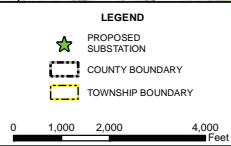
ARW/kea

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: MULGA (1985) AND WELLSTON (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2017.



PROJECT LOCATION MAP

RHODES SUBSTATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: AKW	DATE: 5/11/2017
CHECKED: EFJ	APPROVED:

From: susan_zimmermann@fws.gov on behalf of [Ohio, FW3](#)
To: [Allison Wheaton](#)
Cc: kate.parsons@dnr.state.oh.us; nathan.reardon@dnr.state.oh.us
Subject: Four (4) AEP Projects: Heppner / Rhoads / Ginger / Rhoads-Heppener
Date: Friday, June 02, 2017 1:39:00 PM
Attachments: [Capture of Dan.PNG](#)



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



03E15000-2017-TA-1329 GAI AEP Ginger Switch Replacement Project, Ross Co.
03E15000-2017-TA-1328 GAI AEP Heppner Substation Project, Jackson Co.
03E15000-2017-TA-1327 GAI AEP Rhodes Substation Project, Jackson Co.
03E15000-2017-TA-1326 GAI AEP Rhoads-Heppner 138kV Line Rebuild, Jackson

Dear Ms. Wheaton,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags =3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as

well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

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 "Dan Everson".

Dan Everson

Field 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

May 11, 2017
Project C170352.09

Mr. Dan Everson
United States Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

**American Electric Power
Rhodes Substation Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Jackson County, Ohio**

Dear Mr. Everson:

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 Rhodes Substation Project (Project) in Jackson County, Ohio. As part of this request, please provide information specific to any threatened and endangered bats. GAI is also requesting the locations of any known golden or bald eagle nests in the area.

The proposed Project involves the construction of the Heppner Substation (approximately two acres).

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists primarily of old field habitat. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 330.324.9148 or via email at a.wheaton@gaiconsultants.com if you have any questions or require further information.

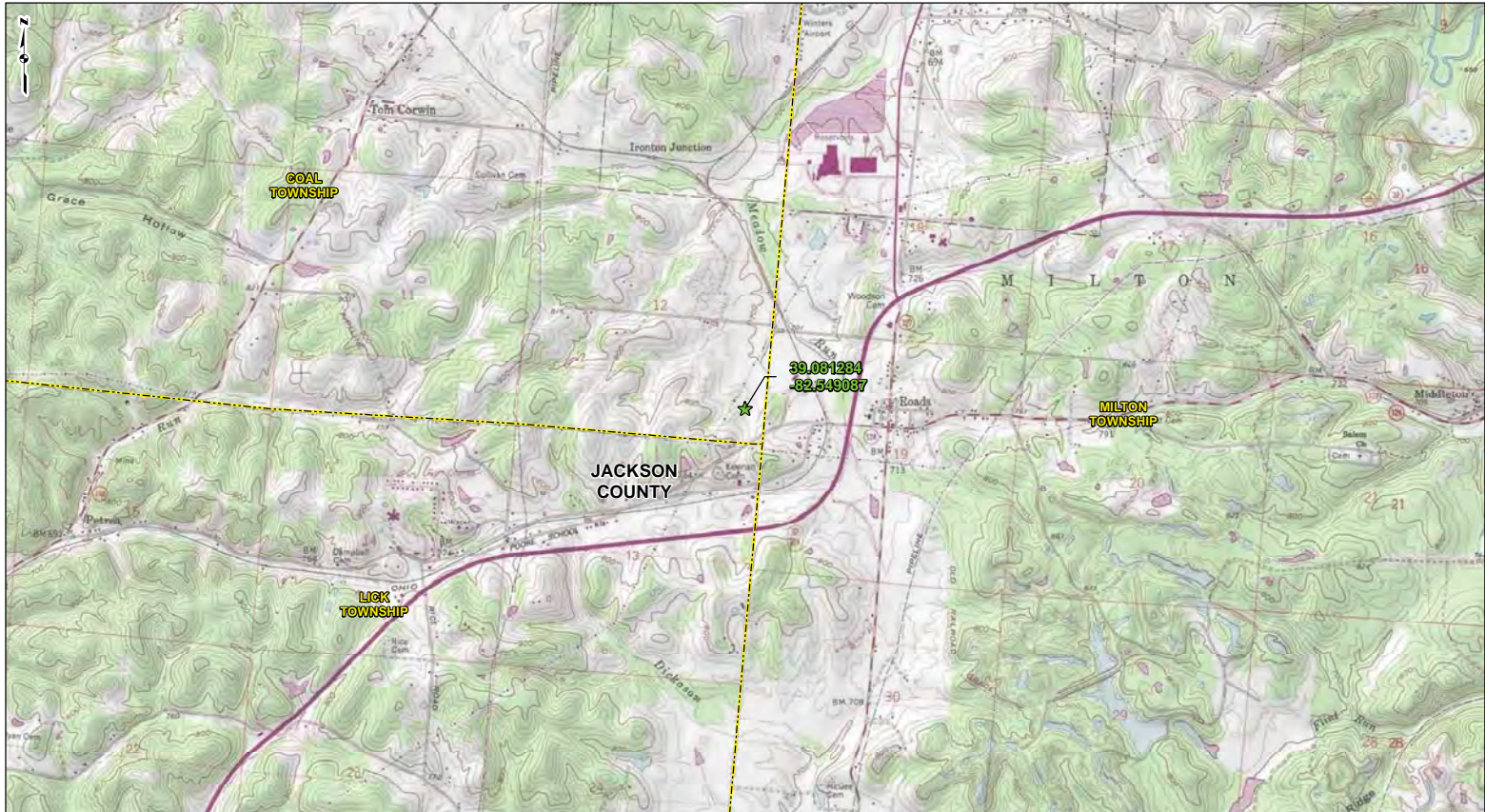
Sincerely,
GAI Consultants, Inc.

Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

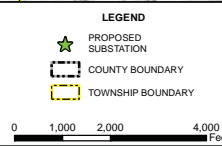
ARW/kea

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: MULGA (1985) AND WELLSTON (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2017.



PROJECT LOCATION MAP

RHODES SUBSTATION PROJECT

AMERICAN ELECTRIC POWER

DRAWN BY: AKW
CHECKED: EFJ

DATE: 5/11/2017
APPROVED:



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

October 20, 2017

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

Re: 17-638; AEP, Rhodes - Heppner 138kV Line Rebuild Project

Project: The proposed project involves the rebuilding of approximately 4.6 miles of the Rhodes - Heppner 138kV transmission line.

Location: The proposed project is in Coal and Lick Townships, 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 the following records at or within a one-mile radius of the project area:

Cerulean warbler (*Dendroica cerulea*), State and federal species of concern
Coalton Wildlife Area – ODNR Division of Wildlife

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

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

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

The DOW recommends that impacts to streams, wetlands and other water resources be avoided

and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

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

The project is within the range of 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 of sufficient size, 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. 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 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 along the project route, 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 along the project route and within the vicinity of the project route, 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, 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.

John Kessler
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
John.Kessler@dnr.state.oh.us



Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

May 12, 2017
Project C170352.06

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
Rhodes – Heppner 138kV Line Rebuild Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Jackson 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 Rhodes – Heppner 138kV Line Rebuild Project (Project) in Jackson County, Ohio. As part of this request, please provide information specific to any threatened and endangered bats. GAI is also requesting the locations of any known golden or bald eagle nests in the area.

The proposed Project involves the rebuild of approximately 4.6 miles of the Rhodes – Heppner 138kV transmission line.

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists of maintained right-of-way bordered by mixed deciduous forests, agricultural lands, and residential properties. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 330.324.9148 or via email at a.wheaton@gaiconsultants.com if you have any questions or require further information.

Sincerely,
GAI Consultants, Inc.

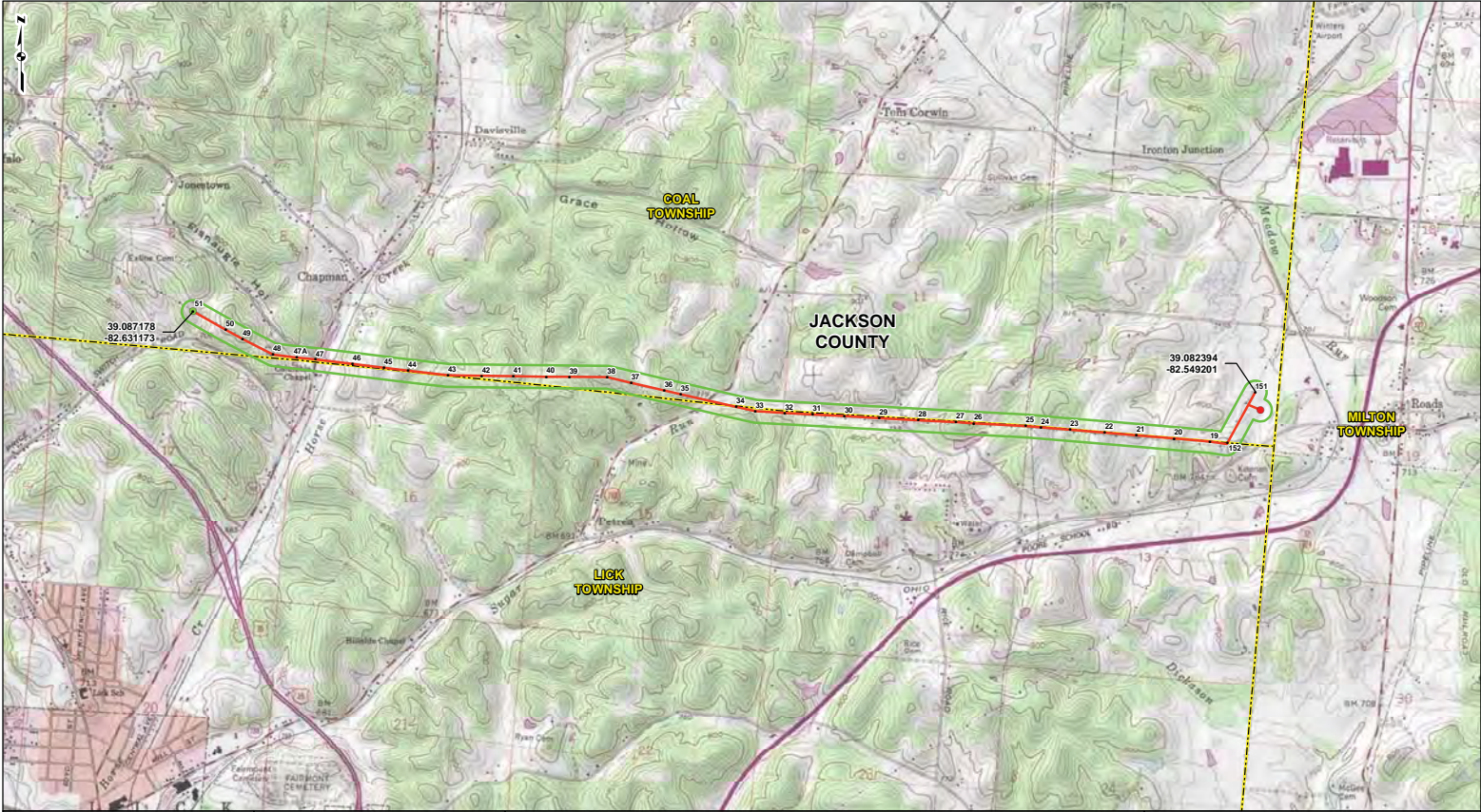
A handwritten signature in blue ink, appearing to read 'Allison R. Wheaton'.

Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

ARW/kea

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



JACKSON COUNTY, OHIO

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: JACKSON (1978) AND WELLSTON (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2017.

LEGEND

- EXISTING STRUCTURE
- (PROPOSED) HEPPNER SWITCH STATION
- (PROPOSED) RHODES SWITCH STATION
- EXISTING TRANSMISSION LINE
- STUDY AREA
- COUNTY BOUNDARY
- TOWNSHIP BOUNDARY

0 1,000 2,000 4,000 Feet

PROJECT LOCATION MAP

RHODES - HEPPNER
138kV LINE REBUILD PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: AKW
CHECKED: EFJ

DATE: 5/12/2017
APPROVED:

From: susan_zimmermann@fws.gov on behalf of [Ohio, FW3](#)
To: [Allison Wheaton](#)
Cc: kate.parsons@dnr.state.oh.us; nathan.reardon@dnr.state.oh.us
Subject: Four (4) AEP Projects: Heppner / Rhoads / Ginger / Rhoads-Heppener
Date: Friday, June 02, 2017 1:39:00 PM
Attachments: [Capture of Dan.PNG](#)



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



03E15000-2017-TA-1329 GAI AEP Ginger Switch Replacement Project, Ross Co.
03E15000-2017-TA-1328 GAI AEP Heppner Substation Project, Jackson Co.
03E15000-2017-TA-1327 GAI AEP Rhodes Substation Project, Jackson Co.
03E15000-2017-TA-1326 GAI AEP Rhoads-Heppner 138kV Line Rebuild, Jackson

Dear Ms. Wheaton,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags =3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as

well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

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If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

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 "Dan Everson".

Dan Everson

Field 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

May 12, 2017
Project C170352.06

Mr. Dan Everson
United States Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

**American Electric Power
Rhodes – Heppner 138kV Line Rebuild Project
Request for Technical Assistance Regarding Threatened
and Endangered Species and Critical Habitat
Jackson County, Ohio**

Dear Mr. Everson:

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 Rhodes – Heppner 138kV Line Rebuild Project (Project) in Jackson County, Ohio. As part of this request, please provide information specific to any threatened and endangered bats. GAI is also requesting the locations of any known golden or bald eagle nests in the area.

The proposed Project involves the rebuild of approximately 4.6 miles of the Rhodes – Heppner 138kV transmission line.

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists of maintained right-of-way bordered by mixed deciduous forests, agricultural lands, and residential properties. Project shapefiles have been included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 330.324.9148 or via email at a.wheaton@gaiconsultants.com if you have any questions or require further information.

Sincerely,
GAI Consultants, Inc.

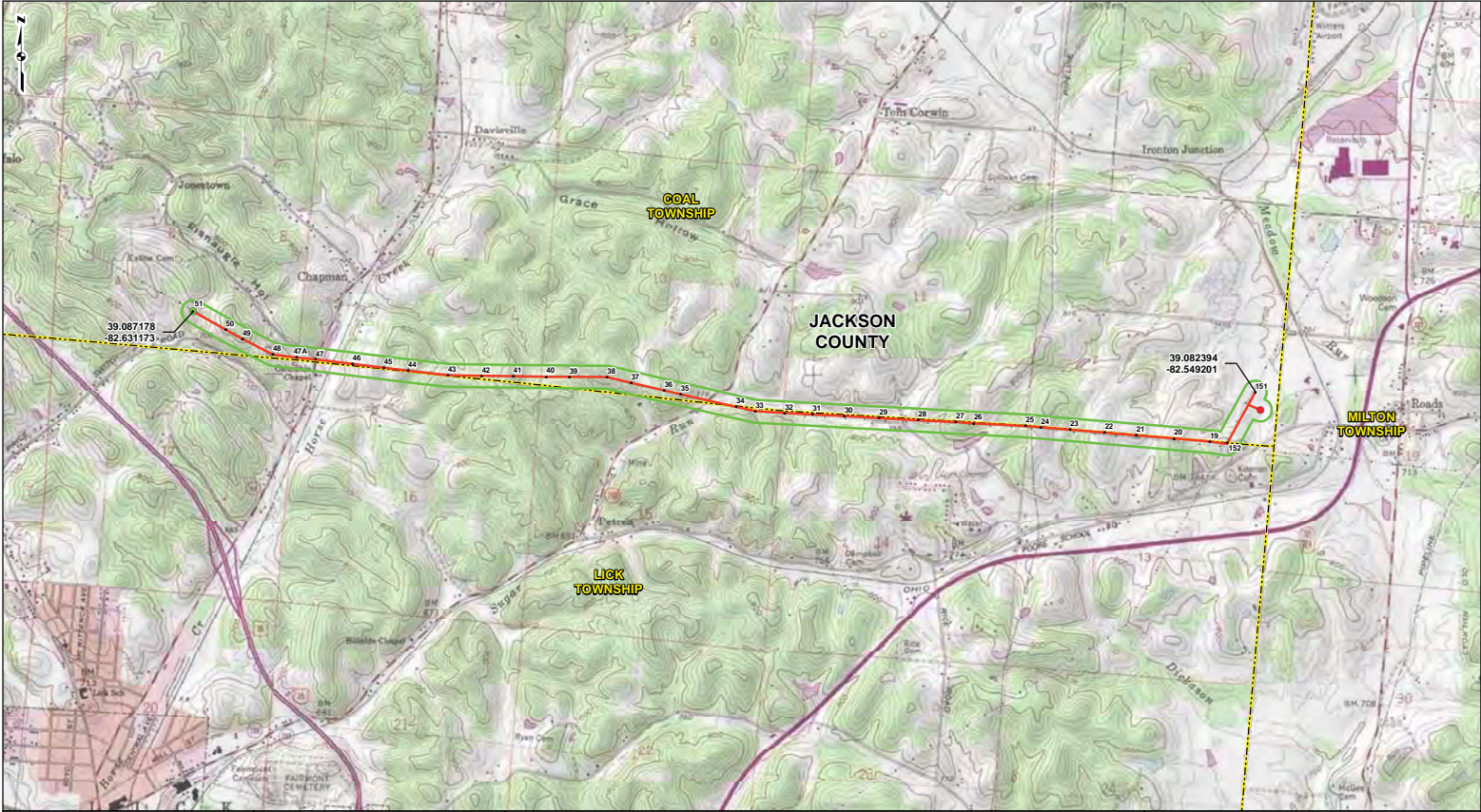
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Allison R. Wheaton, WPIT
Senior Project Environmental Specialist

ARW/kea

Attachments: Attachment 1 (Project Location Map)
Project Shapefiles

ATTACHMENT 1
PROJECT LOCATION MAP



REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: JACKSON (1978) AND WELLSTON (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2017.

LEGEND

•

EXISTING STRUCTURE

●

(PROPOSED) HEPPNER SWITCH STATION

●

(PROPOSED) RHODES SWITCH STATION

—

EXISTING TRANSMISSION LINE

—

STUDY AREA

—

COUNTY BOUNDARY

—

TOWNSHIP BOUNDARY

0 1,000 2,000 4,000

Feet

PROJECT LOCATION MAP

RHODES - HEPPNER
138kV LINE REBUILD PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: AKW
CHECKED: EFJ

DATE: 5/12/2017
APPROVED:

Appendix B Cultural Resources Review



1395 West Fifth Avenue
Columbus, Ohio 43212
Ph: 614-485-9435
Fx: 614-485-9439
Web: www.wellercrm.com

February 8, 2018

**American Electric Power
Attn: Alicia Cross, Transmission Line Siting Spec.
700 Morrison Road
Gahanna, OH 43230**

**RE: Cultural Resources Review of the Poston-Lick 138kV Line Extension Project in
Coal Township, Jackson County, Ohio**

American Electric Power (AEP) contacted Weller & Associates, Inc (Weller) to address the proposed Poston-Lick 138kV electric line extension that is in Coal Township, Jackson County, Ohio. The lead agency involved in this project is the Ohio Power Siting Board (OPSB) and this document may be subject to review by the Ohio History Connection (OHC). The subject area is about .16 ha (.4 ac) in size and accounts for a transmission line tap into the proposed Rhodes Station that is about 45.72 m (150 ft) long; the line has an easement that is 30.5 m (100 ft) wide. This is consistent with the distance from the Poston-Lick 138kV centerline to the edge of the Rhodes Station parcel. Weller was tasked with determining if a Phase I survey was needed for this area and justifying the work.

The subject area was the focus of two previous investigations. Cultural resource investigations had been completed for the Poston-Lick 138kV electric line that accounted for the western part of this area (see attached) (Weller 2015). The eastern part of the area was the subject of a previous survey for Rhodes Station (Weller 2017; Lehmann 2017). These investigations did not result in the identification of any cultural materials that were significant within or near the project area. Effectively, these two prior investigations accounted for the entirety of the project area.

The subject area has been the subject of previous investigations (Weller 2015, 2017; Lehmann 2017). The entirety of the planned Poston-Lick 138kV extension (tap) has been surveyed, reviewed by the OHC and OPSB, and there were no cultural resources identified within it. It is Weller's position that no further cultural resource management work is necessary for this proposed extension.

Thank you,

A handwritten signature in dark ink, appearing to read "Ryan J. Weller", written in a cursive style.

Ryan J. Weller

References

Lehmann, J.

2017 *History/Architecture Investigations for the Proposed 1.96 ha (4.85 ac) Rhodes Station Project in Coal Township, Jackson County, Ohio*. Weller & Associates, Inc. Copy available for review from Ohio History Connection.

Weller, R.

2017 *Phase I Archaeological Investigations for the Proposed 1.96 ha (4.85 ac) Rhodes Station Project in Coal Township, Jackson County, Ohio*. Weller & Associates, Inc. Copy available for review from Ohio History Connection.

2015 *Phase I Archaeological Investigations for the Proposed AEP Ohio Poston South and Poston North Transmission Line Rebuild Projects, Lick and Milton Townships, Jackson County, Madison and Knox Townships, Vinton County, and Waterloo, York, and Dover Townships, Athens County, Ohio*. Weller & Associates, Inc. Copy available for review from Ohio History Connection.

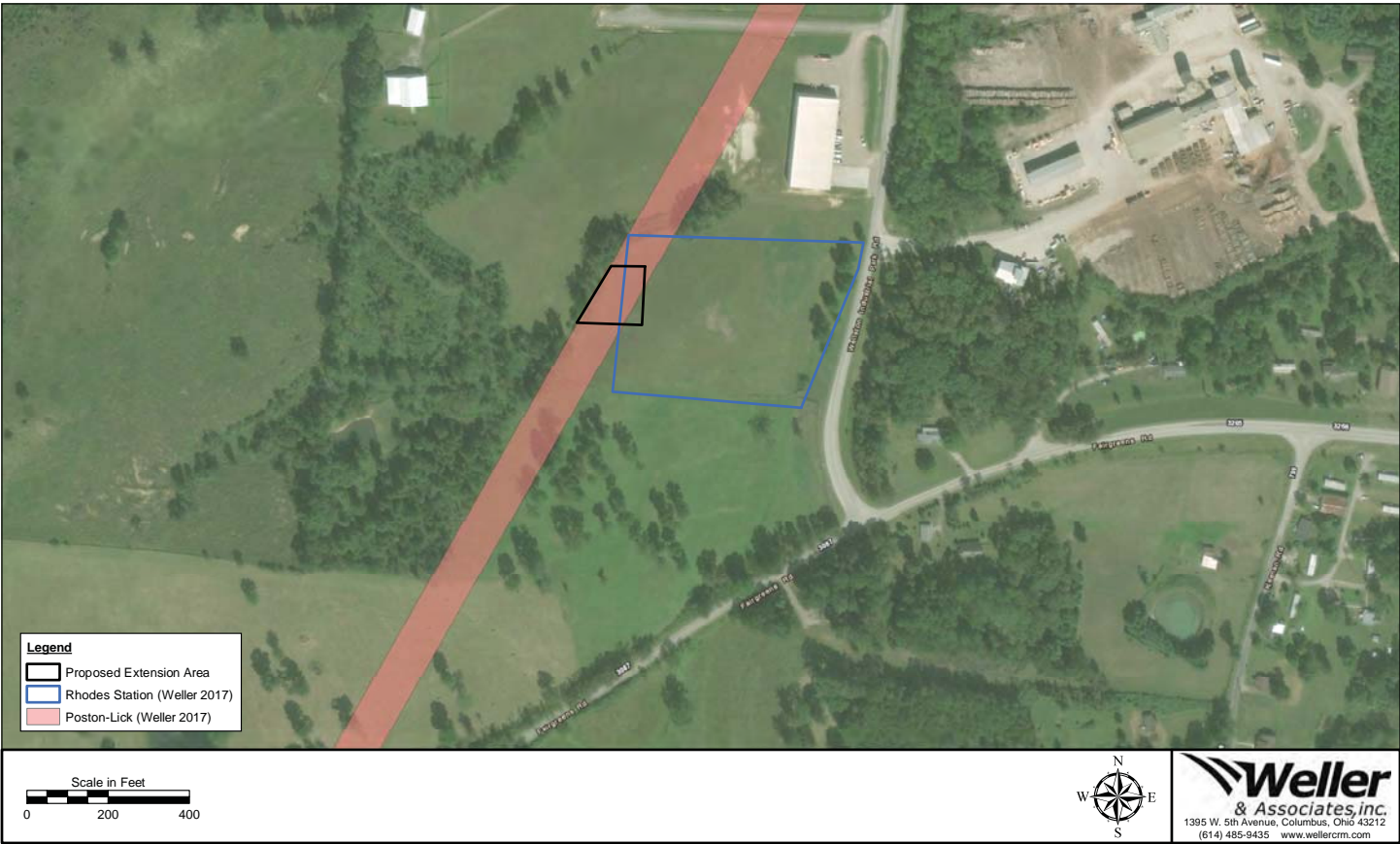
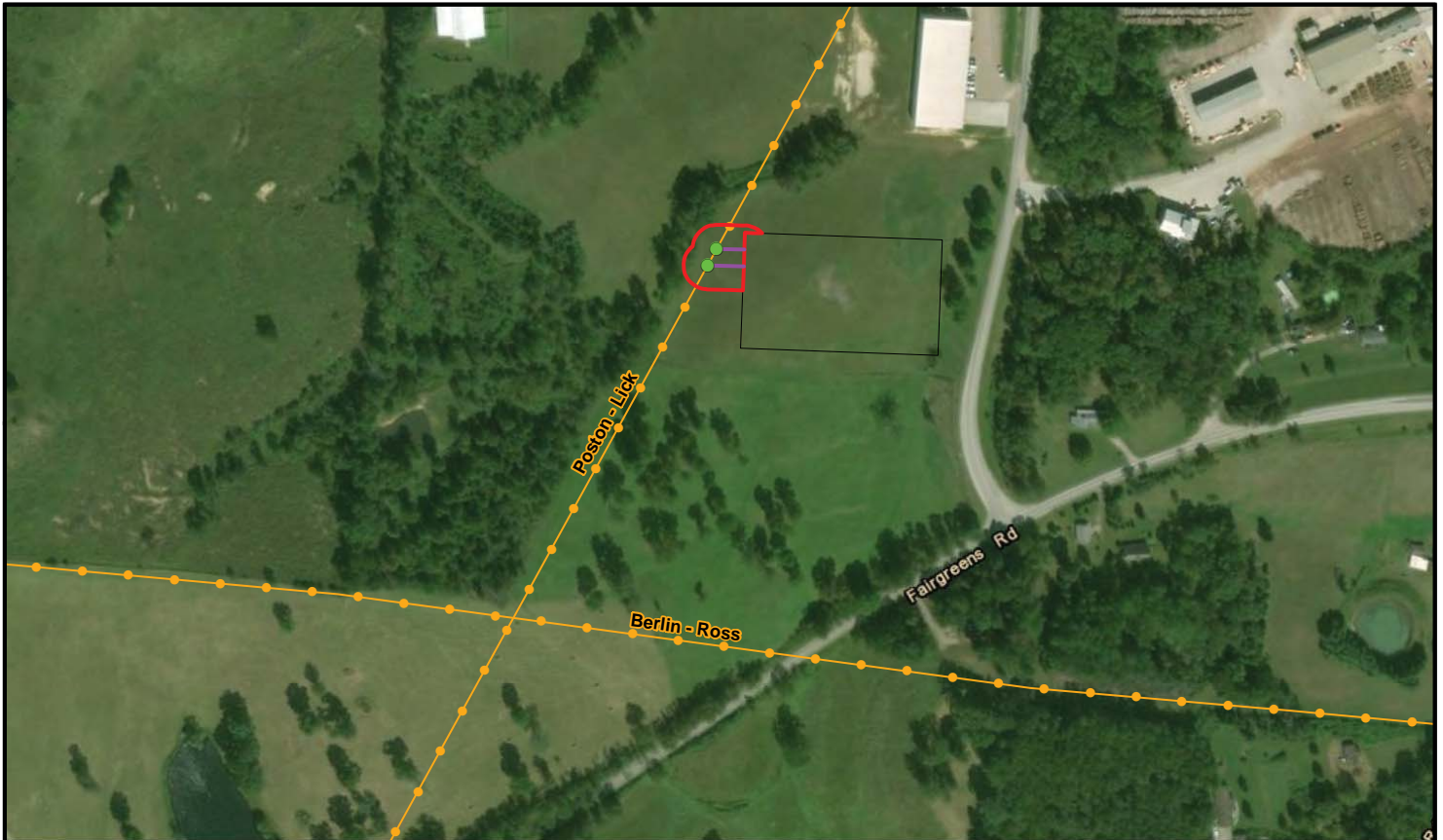


Figure 1

Figure 2



Legend

- Proposed Structure
- Proposed Poston-Lick 138 kV Extension
- Poston-Lick 138 kV Line Extension ROW
- Existing 138 kV Transmission Line
- Proposed Rhodes Station

Data Source: Aerial imagery provided by Vivid - USA, DigitalGlobe, September 2015

Coordinate System and Datum:
NAD_1983_StatePlane_
Ohio_South_FIPS_3402_Feet



Date: 2/14/2018

Locator Map



Figure 2 Detailed Aerial Map



An AEP Company

BOUNDLESS ENERGY

**Poston-Lick 138 kV
Transmission Line
Extension Project**

0 300 600

Scale in Feet

Figure 3

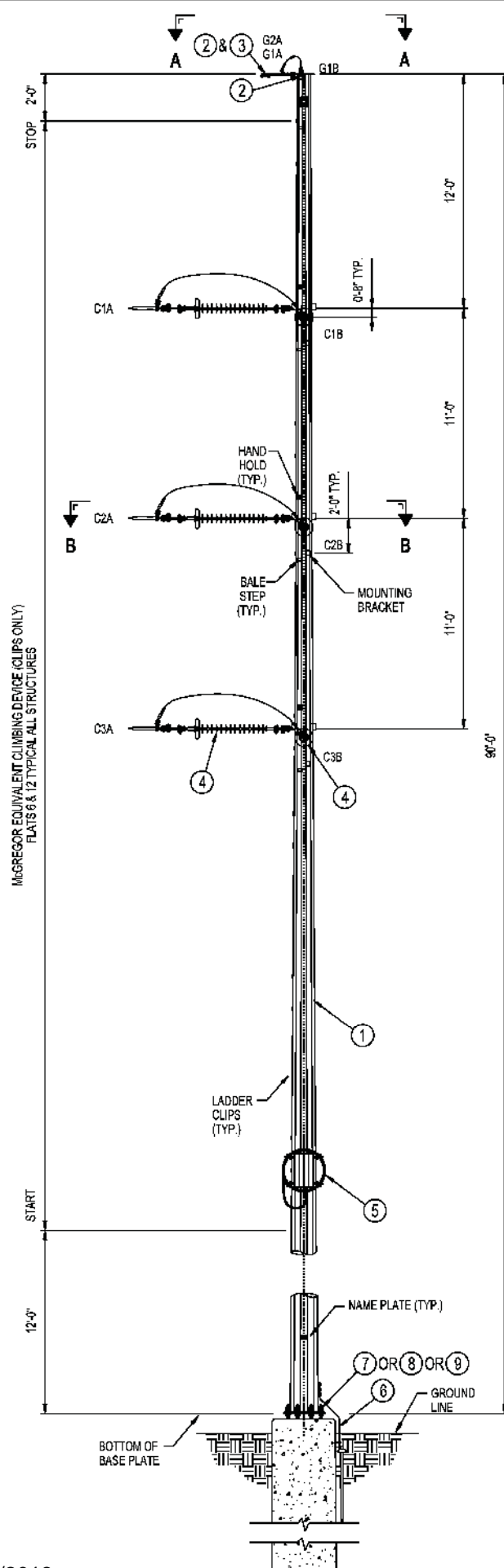


Figure 3
Structure Diagram



Poston-Lick 138 kV
Transmission Line
Extension Project

NOT TO SCALE

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Case No(s). 18-0253-EL-BNR

Summary: Application (Construction Notice) electronically filed by Ms. Christen M. Blend on behalf of AEP Ohio Transmission Power Company, Inc.