

# Letter of Notification Sifford Station Project



An **AEP** Company

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BOUNDLESS ENERGY<sup>SM</sup>

PUCO Case No. 21-0860-EL-BLN

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

Submitted by:  
AEP Ohio Transmission Company, Inc.

August 25, 2021

## Letter of Notification for Sifford Station Project

### Letter of Notification

#### AEP Ohio Transmission Company, Inc. Sifford Station

#### 4906-6-05

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

#### 4906-6-5(B) General Information

##### B(1) Project Description

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

The Company has identified the need to construct the Sifford Station Project (the “Project”) in the City of Lancaster, Fairfield County, Ohio. The Project consists of constructing a new transmission substation to provide electricity to a customer’s facility. The station will be approximately 3.8 acres and located on property owned by the customer. The station will receive looped service from the West Lancaster-Bixby 138 kV transmission line and the Sifford-Ruble 138 kV transmission tie line will service the customer station (these transmission line connections will be filed with OPSB under separate cover). The location of the customer’s property and station area (collectively the “Project Area”) is shown on Figure 1 and Figure 2 in Appendix A.

The Project meets the requirements for a LON because it is within the types of projects defined by item 3 of Ohio Administrative Code Section 4906-1-01 Appendix A of the Application Requirement Matrix For Electric Power Transmission Lines:

*(3) Construction a new electric power transmission substation.*

The Project has been assigned PUCO Case No. 21-0860-EL-BLN.

##### B(2) Statement of Need

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

The Project is necessary to build a new transmission switching station to serve the 100 MW of initial load for a new customer. The customer has indicated a desire to expand the facility that could ultimately result in 300 MW at this site. AEP Ohio will serve the customer-owned stations via several short 138 kV extensions to the new customer-owned stations. The 138 kV extensions will be filed under separate cover with OPSB. The customer has requested an in-service date of July 2022 for the initial load.

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Failure to move forward with the Project will result AEP Ohio's inability to serve the customer's load expectations and, thereby, jeopardize the customer's plans in the area.

The need for this supplemental project was presented and reviewed with stakeholders the February 17<sup>th</sup>, 2021 PJM SRRTEP meeting. This Project was not included in the Company's most recent Long-Term Forecast Report due to the timing of the request (See Appendix B).

### **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.**

The location of the Project in relation to existing and proposed transmission lines and substation is shown in Figure 1 of Appendix A.

### **B(4) Alternatives Considered**

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

The Project is located on customer property and based on the customer's proposed development and existing facilities in the area, the proposed location of the station is the most suitable location for the Project. Other alternatives would require impacting neighboring properties, as opposed to remaining entirely on the customer's property, and would add additional transmission length to the Project without any additional benefit. The selected Sifford Station site and transmission line interconnections are located within the specific customer property on land most recently used for agriculture but has been zoned for industrial use. The proposed Project will result in no impacts to wetlands, streams, or known cultural resource areas eligible for the National Register of Historic Places (NRHP). Additionally, no residences are located within 1,000 feet of the Project. Therefore, this alternative represents the most suitable location and is the most appropriate solution for meeting the Company and specific customer's needs in the area.

### **B(5) Public Information Program**

**The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.**

The Company will inform affected property owners and tenants about this Project through several different mediums. Within seven days of filing this LON, the Company will issue a public notice in a newspaper of general circulation in the Project area. The notice will comply with all requirements of OAC Section 4906-6-08(A)(1-6). Further, the Company has mailed (or will mail) a letter, via first class mail, to affected landowners, tenants, contiguous owners, and any other landowner the Company may approach for an

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easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with all requirements of OAC Section 4906-6-08(B). The Company maintains a website (<http://aeptransmission.com/ohio/>) which hosts an electronic copy of this LON and the public notice of this LON. An electronic and paper copy of the LON will be served to the public library in each political subdivision affected by this Project. In addition, the Company retains right of way land agents that discuss Project timelines, construction and restoration activities and convey this information to affected owners and tenants.

### **B(6) Construction Schedule**

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

Construction of the Project is planned to begin in October 2021, and the anticipated in-service date will be July 2022.

### **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 in Appendix A provides the proposed Project area on a map of 1:24,000-scale (1 inch equals 2,000 feet), showing the Project on the United States Geological Survey (USGS) 7.5-minute topographic map of the Amanda, Ohio quadrangle. Figure 2 in Appendix A show the Project Area on recent aerial photography, dated 2020, as provided by Fairfield County Auditor's Office (GIS Data Downloads - Fairfield County Auditor's Office, Lancaster, Ohio) at a scale of 1:6,000 scale (1 inch equals 500 feet).

To visit the Project site from Columbus, Ohio, take I-70 East to U.S. 33 East toward Lancaster Cleveland for approximately 17 miles. Take to OH-188 Exit Lancaster/Circleville. Turn right (west) on OH-188 and travel 0.4 mile to Whiley Road. Turn right (north) on Whiley Road and continue for approximately 0.6 mile. The customer property is on the left (west) at the approximate address of 105 Whiley Road, Lancaster, Ohio 43130, at latitude 39.727034, longitude -82.691825.

### **B(8) Property Agreements**

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

The proposed Sifford Station is located on one parcel, Parcel Number 057100200, which is owned by the customer. The Company currently has entered into a right of entry agreement with the customer and is in discussion with the customer to obtain an option for an exclusive easement on the property for the

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Project. No other property easements, options, or land use agreements are necessary to construct the Project or operate the station.

A list of properties required for the Project is provided in the table below.

Property Parcel Number	Agreement Type	Easement/ Option Obtained (Yes/No)
0571000200	New Easement Agreement	No

### **B(9) Technical Features**

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

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

The equipment and facilities to be installed within the Project Area will include the following:

138kV Circuit Breakers – (6)  
Drop-In Control Module (DICM) – (1)

### **B(9)(b) Electric and Magnetic Fields**

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

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

### **B(9)(c) Project Cost**

**The estimated capital cost of the project.**

The capital cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$7,500,000. Pursuant to the PJM OATT, the costs for this Project will be recovered in the AEP Ohio Transmission Company Inc.'s FERC formula rate (Attachment H-20 to the PJM OATT) and allocated to the AEP Zone.

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### **B(10) Social and Economic Impacts**

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

#### **B(10)(a) Land Use Characteristics**

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

An aerial photograph of the Project vicinity is provided as Figure 2 in Appendix A. The Project is located in the City of Lancaster, Fairfield County, Ohio. Land use in the Project Area consists of agricultural fields, wooded areas, and scattered residences. The Project site is part of an area within the City of Lancaster zoned as a heavy industrial district although it has been most recently used for row crops. A church is located to southeast adjacent to customer property, approximately 2,000 feet from the Project. The closest residence is approximately 1,700 feet from the Project. No tree clearing is anticipated for the Project.

#### **B(10)(b) Agricultural Land Information**

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

Almost the entire customer property, including the entirety of the Project, is agricultural land. The Fairfield County Auditor provided a list of parcels registered as Agricultural District Land on July 8, 2021. The customer property, including the Project footprint, was not identified as an Agricultural District Land parcel.

#### **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 Company's consultant completed a Phase I Cultural Resource Management Investigation of the Project Area to document previous studies of the area conducted in 2013 and 2018. Previously identified archaeological resources are located in the area (project area and/or general vicinity), but none that were evaluated as being significant for the National Register of Historic Places. No further investigation was considered to be necessary by the consultant. No previously listed or identified historic properties were identified in the Project Area or its viewshed. The Ohio Historic Preservation Office ("SHPO") agreed that the archaeological sites and surrounding structures were not eligible for listing on the NRHP. Correspondences with the SHPO received to date are provided in Appendix C. In response to the 2018 OHPO comment letter the Company submitted a request in August 2021 for concurrence from OHPO that the project will not impact any cultural resources and no additional coordination is necessary prior to construction. Additional coordination responses from OHPO will be provided to OPSB Staff once received.

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### **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.**

A Notice of Intent will be filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHCD000005. The Company will also coordinate storm water permitting needs with the City of Lancaster as required. The Company will implement and maintain best management practices as outlined in the Project-specific Storm Water Pollution Prevention Plan ("SWPPP") to minimize erosion control sediment to protect surface water quality during storm events. Coordination with the City of Lancaster is required for the SWPPP and is currently ongoing.

No streams or wetlands are located in the Project Area (see Appendix D). Therefore, the Project will not require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers or a Section 401 Water Quality Certification from the OEPA.

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 **39045C0230G**). Based on this mapping, no mapped FEMA floodplains are located in the Project Area. Therefore, no floodplain permit will be required for this Project

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.**

As part of the ecological study completed for the Project, a coordination letter was submitted to the USFWS Ohio Ecological Services Field Office seeking technical assistance on the Project for potential impacts to threatened or endangered species. The May 28, 2021 response letter from the USFWS (see Appendix C) indicated that seasonal tree clearing would be required if bat habitat trees were identified. No tree clearing is anticipated as part of the Project. Due to the Project type, size, and location, USFWS does not anticipate adverse effects to any federally endangered, threatened, proposed, or candidate species.

A coordination letter was submitted to the Ohio Department of Natural Resources ("ODNR") Division of Wildlife ("DOW") Ohio Natural Heritage Program ("ONHP") and the ODNR - Office of Real Estate in May 2021, seeking an environmental review of the proposed Project for potential impacts on state-listed and

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federally-listed threatened or endangered species. Correspondence from ODNR's DOW/OHNP and the ODNR – Office of Real Estate was received on June 30, 2021 (see Appendix C).

According to the ODNR-DOW, the Project is within the range of the Indiana bat, northern long-eared bat, and little brown bat. ODNR commented the Project is in the vicinity of records for the little brown bat (*Myotis lucifugus*) a state endangered species. Due to the record of the little brown bat in the vicinity of the Project and related buffer area the ODNR recommends cutting between October 1 and March 31. If cutting must occur during summer months, the ODNR recommends additional coordination with ODNR. No winter hibernacula were observed within the Project Area (See Appendix D), and no tree clearing is anticipated for the Project. Therefore, no additional coordination with ODNR is required.

The ODNR-DOW indicated that the Project is within the range of two fish species. Due to no in-water work and habitat, these species are not anticipated to be impacted by the Project. In addition, the ODNR lists the project in the range of the trumpeter swan (*Cygnus buccinators*), a state threatened species. Based on the ecological survey, habitat for the trumpeter swan is not located in the Project area as there are no large marshes or lakes ranging in size from 40 to 150 acres or relative wetlands in the Project area.

### **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 ODNR-DOW response indicated that a mussel bed, Rock Mill Lake Wildlife Area, and Lange Easement – Appalachia Ohio Alliance are areas of ecological concern reported as occurring within one mile of the Project Area. The exact location of the mussel bed was not provided, but it is likely located along the Hocking River approximately 0.6 mile to the north. Rock Mill Lake Wildlife Area is located approximately 0.8 mile to the northwest of the Project. The Appalachia Ohio Alliance easement is located adjacent to the north of the customer property. None of the areas of ecological concern identified by ODNR-DOW will be impacted by the Project.

Correspondence received from the USFWS indicated that there are no federal wilderness areas, wildlife refuges, or designated critical habitat in the Project vicinity (see Appendix D).

FEMA Flood Insurance Rate Maps were consulted to identify any floodplains/flood hazard areas that have been mapped in the Project Area (specifically, map number **39045C0230G**). Based on these maps, no mapped FEMA floodplains are located in the Project area.



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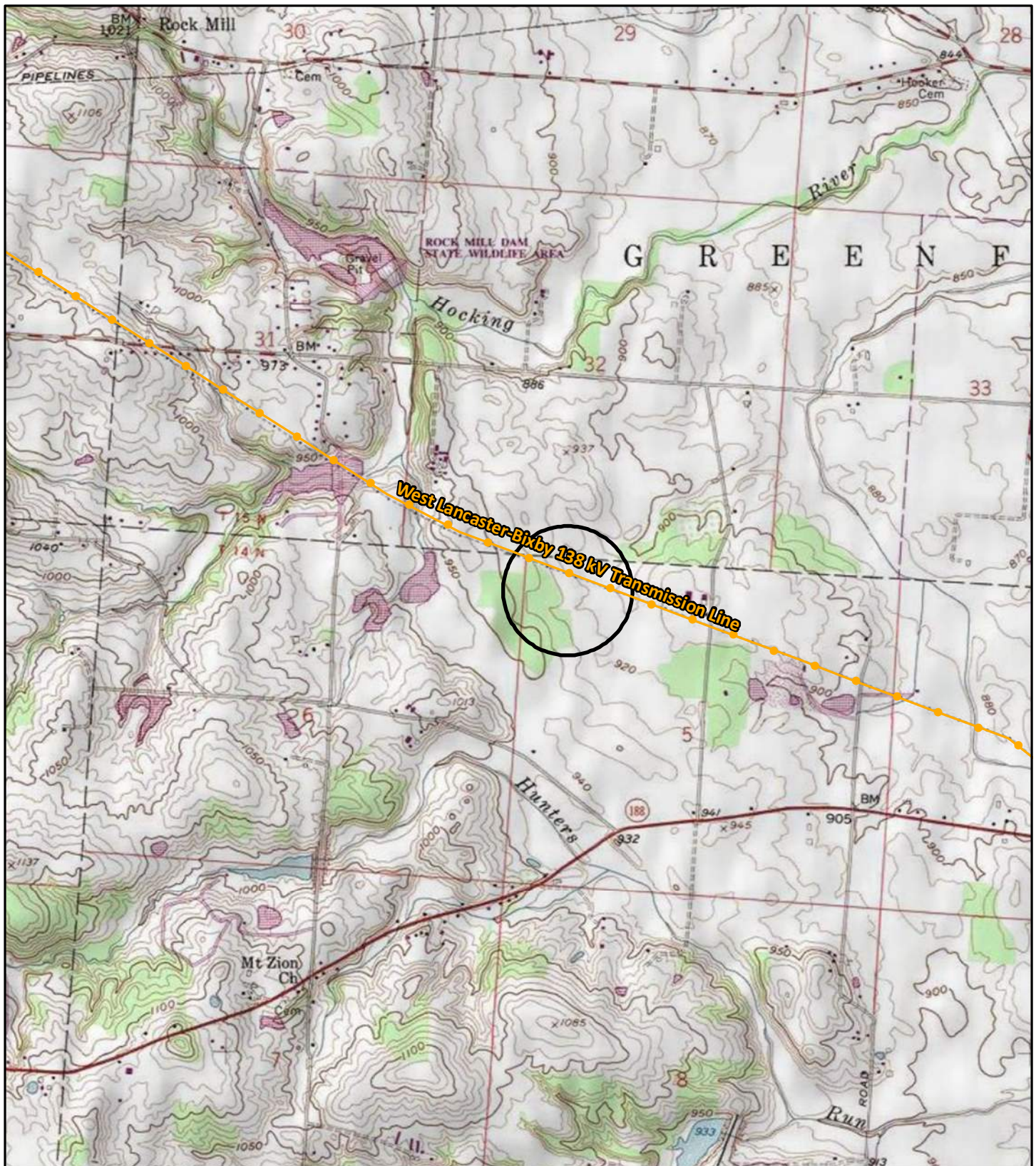
Wetland and stream delineation field surveys were completed within the Project area by the Company's consultant in April 2021. No wetlands or streams were identified within in the Project Area (see Figure 2 in Appendix D).

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

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

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

## **Appendix A Project Maps**



**Legend:**

- Existing Transmission Line (138 kV)
- Project Area

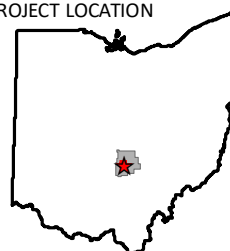
Data Sources: AEP, USGS 7.5'  
Topographic Quadrangle  
(Amanda, Ohio)

Ohio State Plane South  
NAD 1983



May 24, 2021

**PROJECT LOCATION**

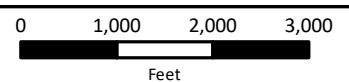


FAIRFIELD COUNTY, OHIO

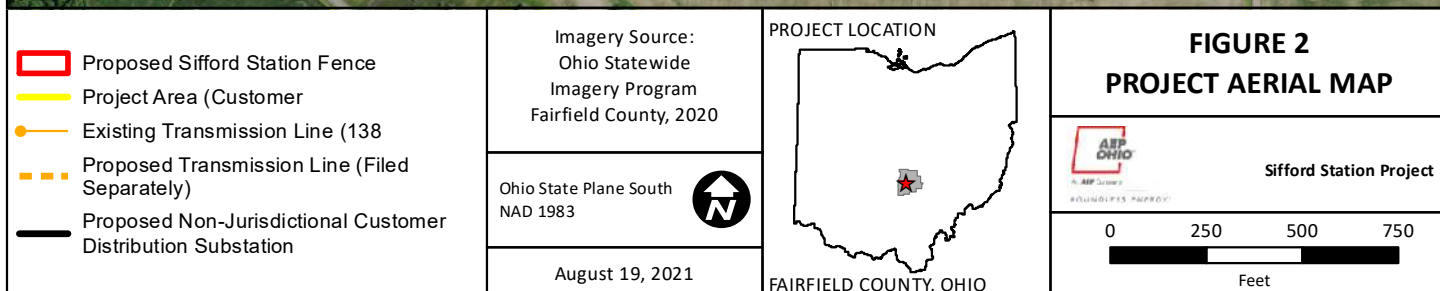
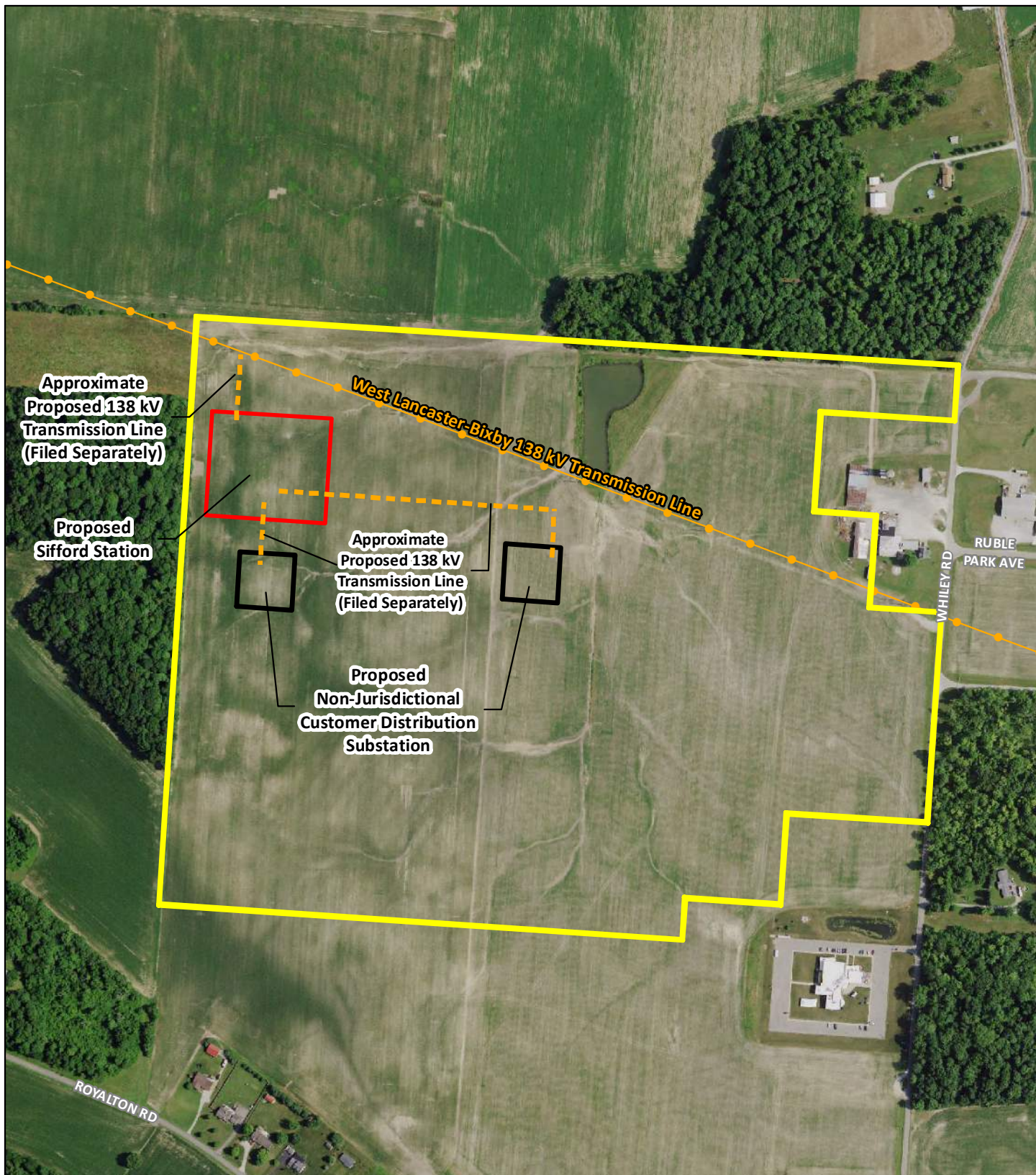
**FIGURE 1  
TOPOGRAPHIC OVERVIEW**



Sifford Station Project







## **Appendix B Long Term Forecast Report and PJM Solution**

# AEP Transmission Zone M-3 Process Lancaster Customer Project

**Need Number:** AEP-2021-OH005

**Process Stage:** Submission of Supplemental Project for inclusion in the Local Plan  
06/29/2021

**Previously Presented:**

Needs Meeting 02/17/2021

Solution Meeting 05/21/2021

**Project Driver:**

Customer Service

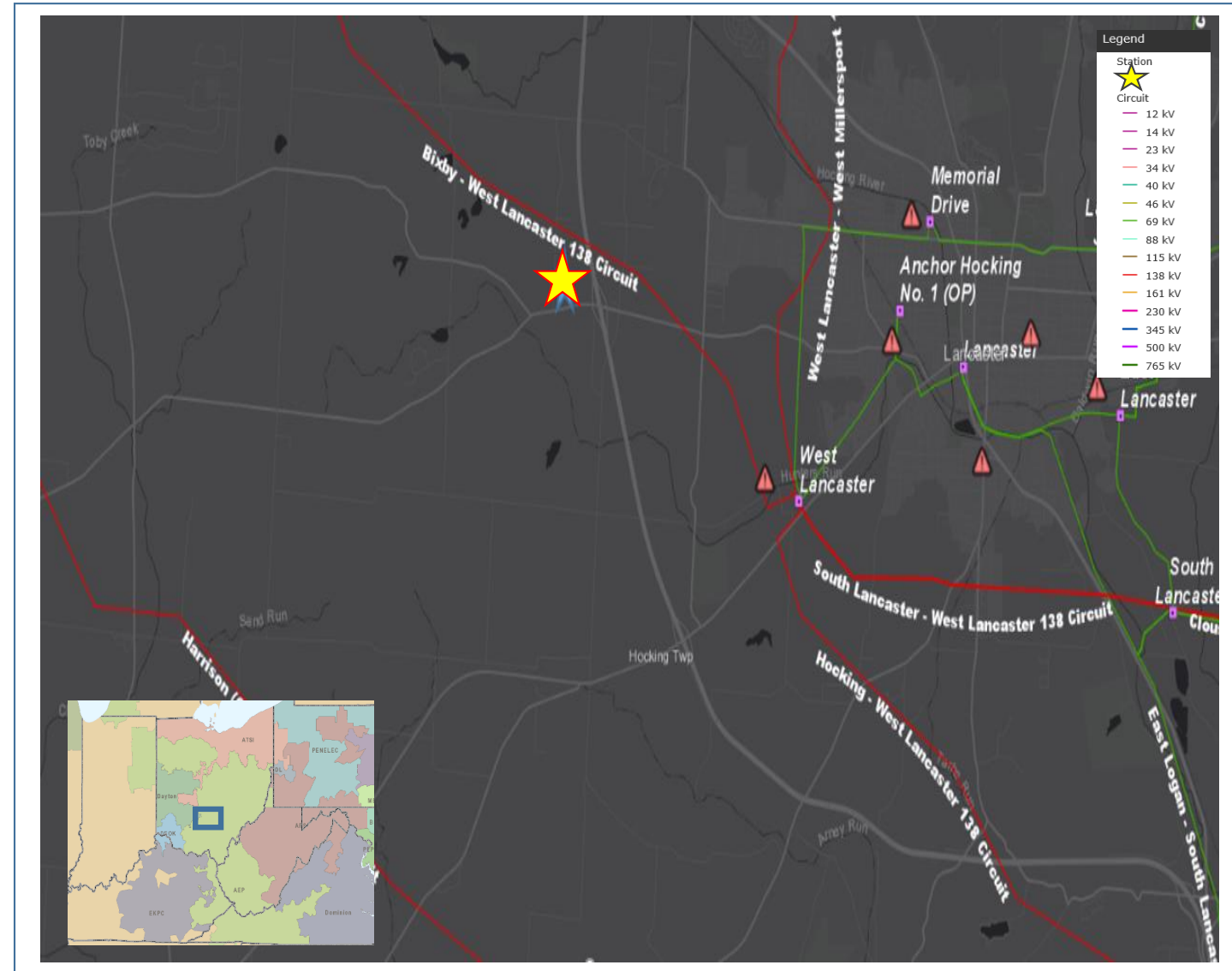
**Specific Assumption Reference:**

AEP Connection Requirements for the AEP Transmission System (AEP Assumptions Slide 12)

**Problem Statement:**

Customer Service:

- A customer has requested transmission service near AEP's existing Bixby – West Lancaster 138 kV circuit in Lancaster, OH.
- The customer has indicated an initial peak demand of 100 MW with the potential for an ultimate capacity of up to 300 MW at the site.





# AEP Transmission Zone M-3 Process Lancaster Customer Project

**Need Number:** AEP-2021-OH005

**Process Stage:** Submission of Supplemental Project for inclusion in the Local Plan  
06/29/2021

## Selected Solution:

- **Sifford Station:** Construct a greenfield 138 kV Station served from the existing Bixby to West Lancaster 138 kV circuit to serve the customer facilities. Station includes installation of six 138 kV, 40 kA, 3000 A circuit breakers laid out in a breaker-and-half arrangement. Retail metering will also be needed. **Estimated Cost: \$7.0M (s2527.1)**
- **West Lancaster – Bixby 138 kV Circuit:** A couple dead end structures will be installed to bring the West Lancaster – Bixby circuit into the new Sifford station. **Estimated Cost: \$0.8M (s2527.2)**
- **Sifford – Ruble #1 138 kV Feed A:** Install 138 kV line extension from AEP's Sifford station to serve the customer's station located just south of the Sifford station. **Estimated Cost: \$0.285M (s2527.3)**
- **Sifford – Ruble #1 138 kV Feed B:** Install a second 138 kV line from AEP's Sifford station to serve the customer's station located just south of the Sifford station to meet customer's redundancy requirements at the site. **Estimated Cost: \$0M (reimbursable) (s2527.4)**
- **West Lancaster Station:** Upgrades will be needed on the existing relays at West Lancaster Station towards Sifford to ensure proper coordination. **Estimated Cost: \$0.03M (s2527.5)**
- **Bixby Station:** Upgrades will be needed to the existing relays at Bixby Station towards Sifford to ensure proper coordination. **Estimated Cost: \$0.03M (s2527.6)**
- **West Millersport – West Lancaster 138 kV Sag Study Mitigation:** The new customer will increase loading on the existing West Millersport – West Lancaster 138 kV circuit. Multiple structure and distribution crossing issues will be mitigated on the line in order to allow the line to operate to its conductor's designed maximum operating temperature. **Estimated Cost: \$1.5M (s2527.7)**

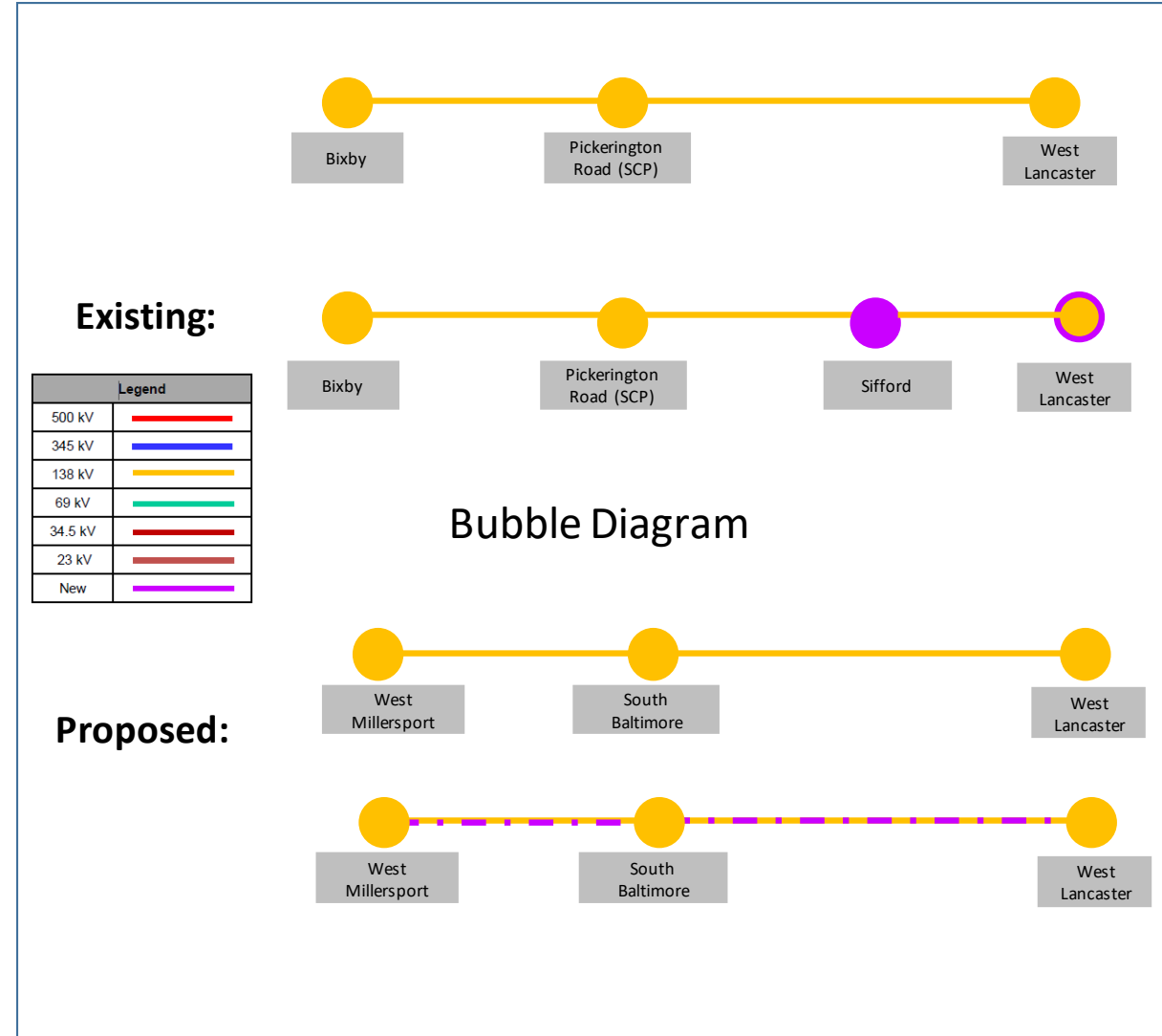
**Estimated Cost:** \$9.645M

**Projected In-Service:** 5/30/2022

**Supplemental Project ID:** s2527.1-.7

**Project Status:** Scoping

**Model:** 2025 RTEP



## **Appendix C Agency Coordination**





# Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

## Office of Real Estate

*John Kessler, Chief*

2045 Morse Road – Bldg. E-2

Columbus, OH 43229

Phone: (614) 265-6621

Fax: (614) 267-4764

June 30, 2021

Matt Teitt  
Stantec  
1500 Lake Shore Drive, Suite 100  
Columbus OH43204-3800

**Re:** 21-0484; AEP Ohio Transmission Company, Inc. (AEP) Ruble Station Project

**Project:** The proposed project includes the construction of a new electrical substation and associated transmission line components.

**Location:** The proposed project is located in Greenfield Township, Fairfield 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.

Mussel bed  
Rock Mill Lake Wildlife Area – ODNR Division of Wildlife  
Lange Easement – Appalachia Ohio Alliance

A review of the Ohio Natural Heritage Database indicates there are no records of state or federal listed plants or animals within the project area. 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. 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 vicinity of records for the little brown bat (*Myotis lucifugus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree cutting inside this buffer may be acceptable after further consultation with DOW (contact Sarah Stankavich, [sarah.stankavich@dnr.state.oh.us](mailto:sarah.stankavich@dnr.state.oh.us)).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH  $\geq 20$  if possible.

The DOW also recommends that a desktop habitat assessment, followed by a field assessment if needed, is conducted to determine if there are potential hibernaculum(a) present within the project area. Information about how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that potential hibernacula are present within 0.25 miles of the project area, please send this information to Sarah Stankavich, [sarah.stankavich@dnr.state.oh.us](mailto:sarah.stankavich@dnr.state.oh.us) for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, and the popeye shiner (*Notropis ariommus*), a state endangered fish. The DOW recommends no in-water work in perennial streams from March 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 trumpeter swan (*Cygnus buccinator*), a state threatened bird. Trumpeter swans prefer large marshes and lakes ranging in size from 40 to 150 acres. They like shallow wetlands one to three feet deep with a diverse mix of plenty of emergent and submergent vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species’ nesting period of April 15 through June 15. If this habitat will not be impacted, this project is not likely to have an impact on this species.

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

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

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

[http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List\\_8\\_16.pdf](http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf)

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at [Sarah.Tebbe@dnr.ohio.gov](mailto:Sarah.Tebbe@dnr.ohio.gov) if you have questions about these comments or need additional information.

Mike Pettegrew  
Environmental Services Administrator (Acting)

**From:** Ohio, FW3 <ohio@fws.gov>  
**Sent:** Friday, May 28, 2021 11:19 AM  
**To:** Teitt, Matthew <Matthew.Teitt@stantec.com>  
**Cc:** nathan.reardon@dnr.state.oh.us; Parsons, Kate <kate.parsons@dnr.state.oh.us>; ajtoohey@aep.com  
**Subject:** AEP's Ruble Station Project, Fairfield County, Ohio

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UNITED STATES DEPARTMENT OF THE INTERIOR  
U.S. Fish and Wildlife Service  
Ecological Services Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2021-TA-1417

Dear Mr. Teitt,

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

**Federally Threatened and Endangered Species:** The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

**Seasonal Tree Clearing for Federally Listed Bat Species:** Should the proposed project site contain trees  $\geq 3$  inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, we recommend removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present. If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

**Section 7 Coordination:** If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

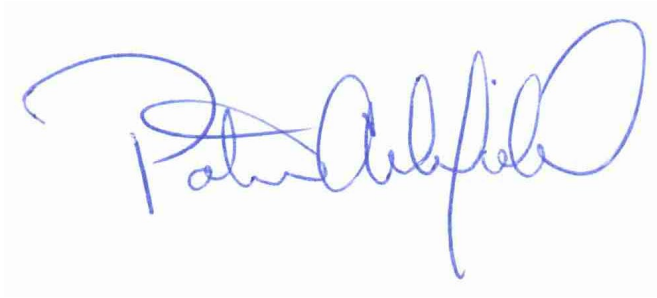
**Stream and Wetland Avoidance:** Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio ([https://epa.ohio.gov/portals/47/facts/ohio\\_wetlands.pdf](https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf)). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

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

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at [mike.pettegrew@dnr.state.oh.us](mailto:mike.pettegrew@dnr.state.oh.us).

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice M. Ashfield". The signature is fluid and cursive, with a large initial "P" and "A".

Patrice M. Ashfield  
Field Office Supervisor

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





In reply refer to  
2013-FRA-24492

May 9, 2013

Rebekah Hovermale, Transmission Line Siting Specialist  
American Electric Power  
700 Morrison Road  
Gahanna, OH 43230

Dear Ms. Hovermale:

Re: West Lancaster-Bixby 138 kV Line Project, Franklin and Fairfield Counties, Ohio

This is in response to the receipt, on May 2, 2013, of *Phase I Cultural Resource Management Investigations for the 29 km (18 mi) American Electric Power West Lancaster-Bixby 138 kV Line Rebuild Project in Madison Township, Franklin County, and Bloom/Greenfield/Hocking Townships, Fairfield County, Ohio* (dated 4/22/2013). This project involves the rebuild of an approximate 18 mi existing transmission line corridor, the use of a temporary staging area, and the construction of several segments of new access roads. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the regulations at 36 CFR Part 800 and Ohio Power Siting Board rules for siting this project (OAC 4906-15-01).

The intention of the current survey was to locate and identify any cultural resources within the project area that may be eligible for the National Register of Historic Places (NRHP). For this project, the rebuild of the transmission line consists of replacing the outdated wooden structures with steel monopoles. The survey report noted that portions of the survey corridor were previously disturbed. Other areas were plowed agricultural fields with visibility suitable for surface collection, while some areas required subsurface shovel testing. Thirteen newly identified archaeological sites were located during the survey (33FR2900-2905 and 33FA1950-1956) and two previously recorded sites were relocated (33FA795 and 33FA1750). The newly identified sites included five low density unassigned prehistoric lithic scatters, seven unassigned prehistoric isolated finds, and one unassigned prehistoric lithic scatter with some historic material also present. None of the prehistoric artifacts were temporally diagnostic. The two previously recorded sites that were relocated consisted of an unassigned prehistoric lithic scatter and an Early Archaic-Late Archaic lithic scatter. The Early Archaic-Late Archaic site (33FA1750) yielded no additional diagnostic artifacts during the current investigation. The site was previously subjected to Phase II National Register Evaluation investigations and found to be not eligible for listing in the NRHP. Weller & Associates, Inc. (Weller), recommends that none of the newly identified sites or the two relocated sites is eligible for listing in the NRHP and no further work is recommended. I concur with this recommendation.

In addition, the transmission line corridor crosses the projected location of the Great Hopewell Road. This road is a hypothesized earthen pathway that reportedly extends from Newark to Chillicothe and was lined on each side by earthen embankments. Dr. Brad Lepper of the Ohio Historical Society has spear-headed the idea and is considered the foremost expert on the Hopewell Road. In consultation with Dr. Lepper, Weller inspected the maps of the proposed route to determine where the transmission line corridor

**OHIO HISTORICAL SOCIETY**

*Ohio Historic Preservation Office*

800 East 17th Avenue, Columbus, Ohio 43211 ph: 614.298.2000 fx: 614.298.2037

[www.ohiohistory.org](http://www.ohiohistory.org)

Ms. Rebekah Hovermale

May 9, 2013

Page 2

intersects the road location. This information was used in the field to closely inspect the intersection area for evidence of the Hopewell Road. No evidence of the road was identified.

Additionally, the transmission line corridor crosses Lock # 22 of the Ohio & Erie Canal at the eastern edge of Groveport. The entire canal system of the State of Ohio is considered eligible for listing in the NRHP, with some portions officially listed. The transmission line corridor's proximity to the lock could constitute an effect to this resource. The lock has been cleared of vegetation and is currently open to the public as an interpretive resource within the public park at Groveport. The existing wooden pole was installed within the embankment of the canal prism less than 50 ft from the lock. In order to minimize new effects to the lock, in consultation with me, prior to the final preparation of the report, AEP, through Weller, agreed to shift the monopole location away from the resource as much as possible. The monopole location will be shifted to the southeast of the existing wooden pole to a previously disturbed area away from the lock. Although the new monopole will still be visible from the lock, it is within an existing corridor, so it should not constitute a new visual effect to the resource. Additionally, no new ground disturbance to the canal prism will occur as part of the project. AEP has agreed to cut off the old wooden pole as or just below the ground surface. By leaving the underground portion of the pole in place, it was felt that additional damage to the prism wall could be avoided rather than risking additional damage during the removal of the pole from the location. By following these guidelines, I do not feel that the project will introduce new effects to the resource. Based on this, I feel that the project will have no adverse effect on the historic property.

No further coordination is requested for this project unless the project changes or archaeological remains are discovered during the course of the project. In this situation, this office should be contacted as per 36 CFR § 800.13.

If you have any questions, please contact me at (614) 298-2000, or by email at [cnelson@ohiohistory.org](mailto:cnelson@ohiohistory.org).

Sincerely,



Christopher Nelson, Project Reviews Manager

Cc: Ryan Weller, Weller & Associates





In reply refer to  
2018-FAI-42151

June 27, 2018

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

Dear Mr. Weller:

RE: 125 Acre Jobs Ohio Development, Hocking Township, Fairfield County, Ohio

This is in response to the receipt, on May 31, 2018, of *A Phase I Archaeological Investigations for a 50.6 ha. (125 ac) Jobs Ohio Prospective Site Development Area in Hocking Township, Fairfield County, Ohio*. Also submitted, under separate cover, was *History/Architecture Investigations for a 50.6 ha. (125 ac) Jobs Ohio Prospective Site Development Area in Hocking Township, Fairfield County, Ohio*. This project involves a 125 acre parcel of land to be used for future unspecified construction. The comments of the Ohio Historic Preservation Office are submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended.

Surface collection and intensive visual inspection of the project area resulted in the identification of 30 previously unrecorded archaeological sites and the re-identification of 33 Fa 1952. These sites, 33 Fa 1952, and 33 Fa 2344-2373, are small lithic/historic artifact scatters typical of short term occupations. These sites are not likely to yield additional information about Ohio prehistory or history. Based on the information provided, it is my opinion that these properties are not eligible for inclusion in the National Register of Historic Places. The History/Architecture survey examined three previously recorded structures and two previously unrecorded structures. This office recommends that these properties are not eligible for inclusion in the National Register of Historic Places.

Given that the parameters of the industrial development have not been established, our office cannot provide additional comments about the indirect effects the undertaking might have on cultural resources outside of the current survey area. Once the plans have been established our office recommends further coordination. Our office recommends additional consultation that addresses the effects of this undertaking.

If you have any questions, please contact me at (614) 298-2000, or by email at [nyoung@ohiohistory.org](mailto:nyoung@ohiohistory.org).

Sincerely,

A handwritten signature in black ink that reads "Nathan J. Young".

Nathan J. Young, Project Reviews Manager  
Resource Protection and Review



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

**Commission of Ohio Docketing Information System on**

**8/25/2021 1:11:02 PM**

**in**

**Case No(s). 21-0860-EL-BLN**

Summary: Letter of Notification Letter of Notification Part 1 electronically filed by Hector Garcia-Santana on behalf of AEP Ohio Transmission Company, Inc.