Construction Notice
Sifford-Ruble 138 kV Tie Lines Project

PUCO Case No. 21-0975-EL-BNR

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

Submitted by:
Ohio Power Company

October 7, 2021

Construction Notice

Ohio Power Company
Sifford-Ruble 138 kV Tie Lines

4906-6-05

Ohio Power Company (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 Construction Notice.

The Company proposes to construct the Sifford-Ruble 138 kV Tie Lines Project (the "Project") in the City of Lancaster, Fairfield County, Ohio to meet the needs of a specific customer. The purpose of the Project is to provide 138 kV service to a non-jurisdictional customer station by extending two 138 kV transmission lines from Sifford Station (OPSB Case Number 21-0860-EL-BLN - scheduled for automatic approval on September 24, 2021) to the customer station. The length of each proposed transmission tie line is less than 0.1 mile. The West Lancaster-Bixby 138 kV Extension will provide looped 138 kV service to Sifford Station, which will be filed with OPSB under separate cover (OPSB Case No. 21-0974-EL-BNR). The location of the customer's property and proposed transmission line corridors (collectively the "Project Area") is shown on Figure 1 and Figure 2 in Appendix A.

The Project meets the requirements for a CN because it is within the types of projects defined by item (1)(d)(i) of Ohio Administrative Code Section 4906-1-01 Appendix A of the 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:

(d) Line(s) primarily needed to attract or meet the requirements of a specific customer or customers, as follows:

(i) The line is completely on the property owned by the specific customer or the applicant.

The Project has been assigned PUCO Case No. 21-0975-EL-BNR.

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.

As part of a recent customer service request, the Company will be required to construct two short 138 kV tie lines to connect AEP Ohio Transmission Company's, Inc. Sifford 138 kV Station (PUCO Case No. 21-0860-EL-BLN - scheduled for automatic approval on September 24, 2021) to a customer owned station located near Lancaster, Ohio. The circuits will provide service to the customer's first phase of their build out and will serve approximately 100 MW of initial load (ultimate load is potentially 300 MW at the site). In addition, Ohio Power Company will serve the customer via several short 138 kV line extensions to new customer-owned stations on the customer's property, which will be filed under separate cover as the customer's load increases. The tie lines will involve the installation of two separate single circuit 138 kV structures between the proposed Sifford Station and customer station. The customer has requested an in-service date from AEP Ohio by July 2022 for the initial load.

Failure to move forward with the proposed project will result in the Company's inability to serve the customer's load expectations and thereby jeopardize the customer's plans in the area (potentially 300MW peak).

The need and solution for this supplemental project was presented and reviewed with stakeholders the February 17, 2021 and May 21, 2021 PJM SRRTEP meeting (s2527). This Project was included in a supplement to the Company's 2021 Long Term Forecast Report, filed in Case No. 21-1501-EL-FOR on July 13, 2021, on page 16. (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. 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 is not anticipated to impact wetlands, streams, or any 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 maintains a website (http//aeptransmission.com/ohio/) on which an electronic copy of this CN is available. An electronic copy of the CN will be served to the public library in each political subdivision affected by this Project. The Company also retains land agents who will discuss Project timelines, construction and restoration activities with 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 December 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 Project is located on one parcel, Parcel Number 057100230, 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 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)
0571000230	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.

Line Asset Name:	Sifford-Ruble 138 kV
Ownership:	Ohio Power Company
Voltage:	138 kV
Conductors:	2 – (3) 556 KCM ACSR (26/7)
Static Wire:	(4) 7#8 Alumoweld
Insulators:	Polymer
ROW Width:	100 feet
Structure Type:	(2) Single circuit, monopole, horizontal post, direct embed

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 $420,000 using a Class 4 estimate. Pursuant to the PJM OATT, the costs for this Project will be recovered in the AEP Ohio Transmission Company's FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

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. No residences or institutions are within 1,000 feet of 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 August 25, 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.

Weller and Associates completed Phase I Cultural Resource Management investigations of the customer property, an Ohio Job Ready site, in 2013 and 2018. Previously identified archaeological resources are located in the area (project area and 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. In response to the 2018 SHPO comment letter, Weller and Associates, on behalf of the Company, submitted an additional request in August 2021 for concurrence from SHPO that the Project will not impact any cultural resources and no additional coordination is necessary prior to construction. SHPO concurred that no further coordination is necessary unless the specifics of the project change or additional historic properties are identified during construction (See Appendix C).

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 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 anticipated.

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. Therefore, the Project is not anticipated to impact the trumpeter swan.

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. In addition, an inactive gravel mine currently managed as Hunters Run Conservation District, a structure reservoir, is located approximately 0.25 mile west of the Project. None of the areas of ecological concern 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.

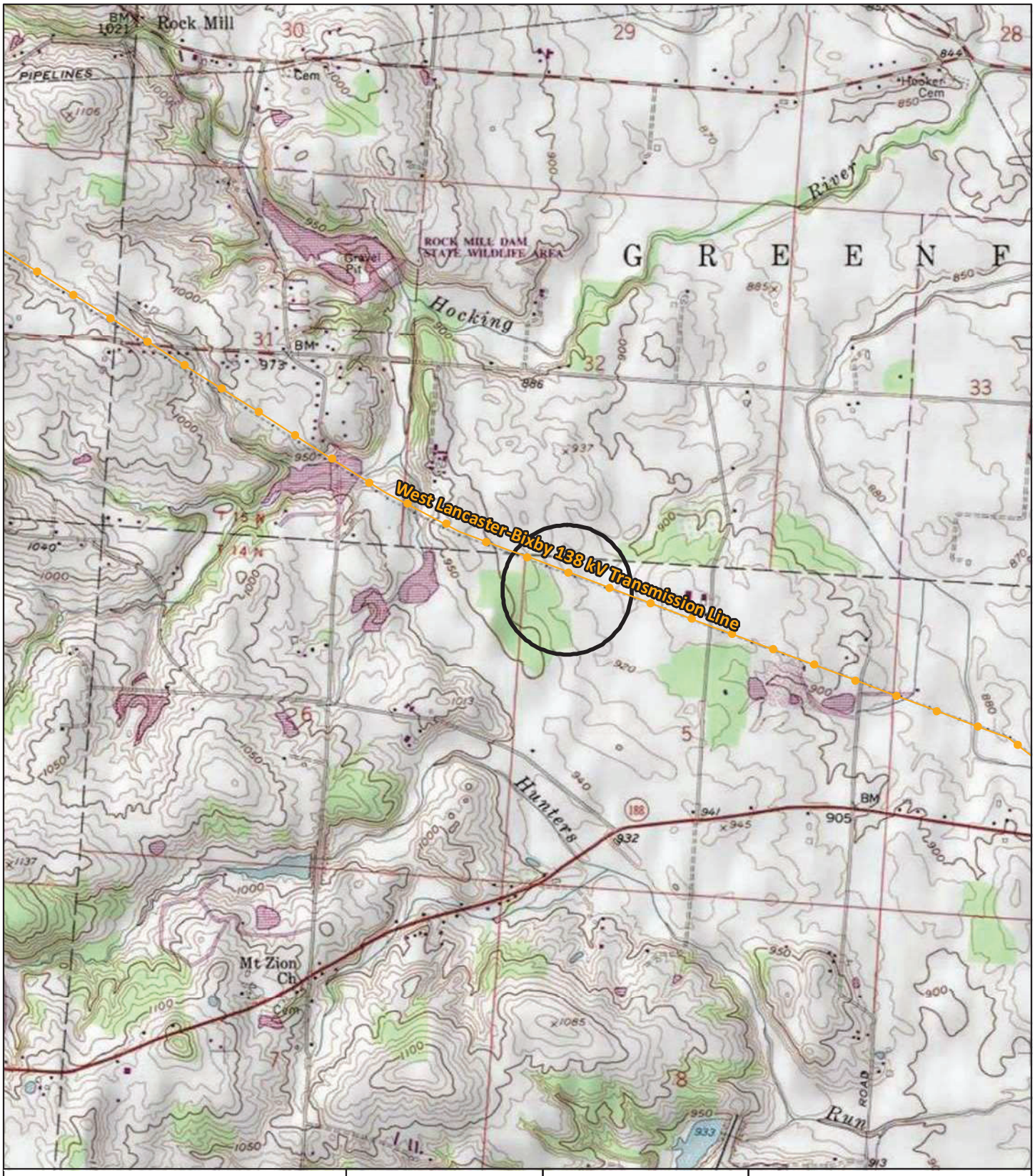
Wetland and stream delineation field surveys were completed within the Project area by the Company's consultant in April 2021. No wetlands or streams were identified within in the Project Area (see Figure 2 in Appendix D).

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

August 26, 2021

PROJECT LOCATION

FAIRFIELD COUNTY, OHIO

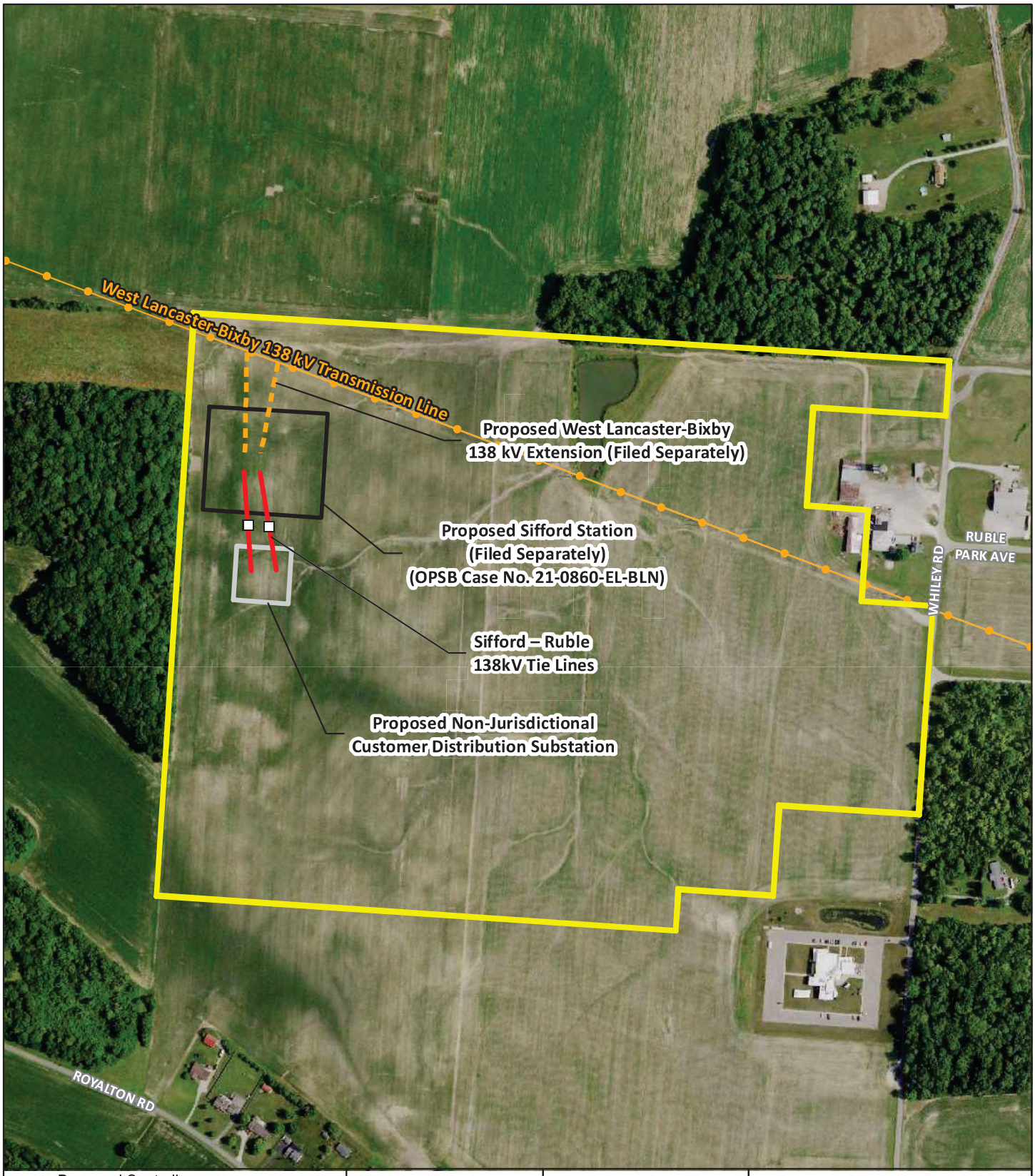
FIGURE 1
TOPOGRAPHIC OVERVIEW

AEP OHIO

Sifford-Ruble 138 kV Tie Lines Project

0 1,000 2,000 3,000

Feet



Proposed Centerline
Proposed Structure
Project Area (Customer Property)
Existing Transmission Line (138 kV)
Proposed Sifford Station (Filed Separately)
Proposed West Lancaster-Bixby 138 kV Extension (Filed Separately)
Proposed Non-Jurisdictional Customer Distribution Substation

Imagery Source:
Ohio Statewide
Imagery Program
Fairfield County, 2020

Ohio State Plane South
NAD 1983

September 13, 2021

PROJECT LOCATION

FAIRFIELD COUNTY, OHIO

FIGURE 2
PROJECT AERIAL MAP

AEP OHIO

Sifford-Ruble 138 kV Tie Lines Project

0 250 500 750

Feet

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

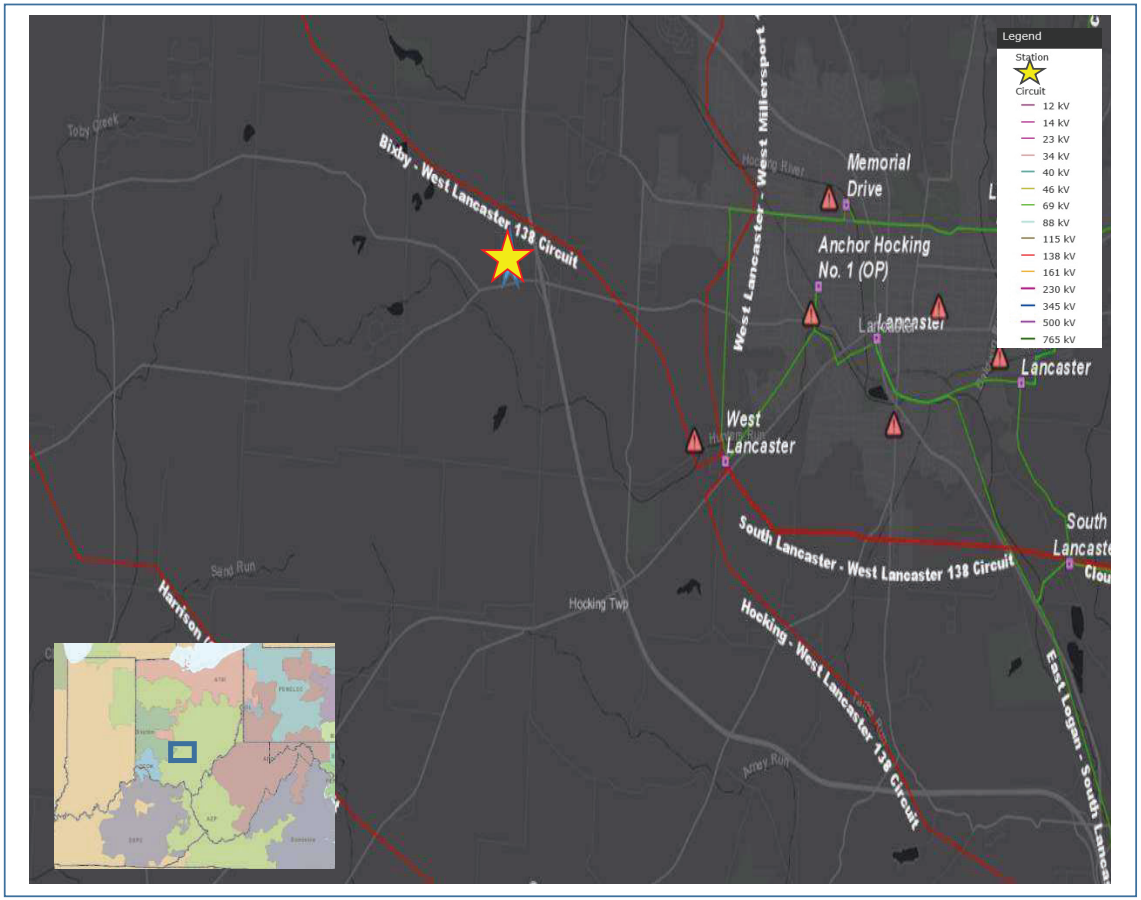
Specific Assumption Reference:

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)**

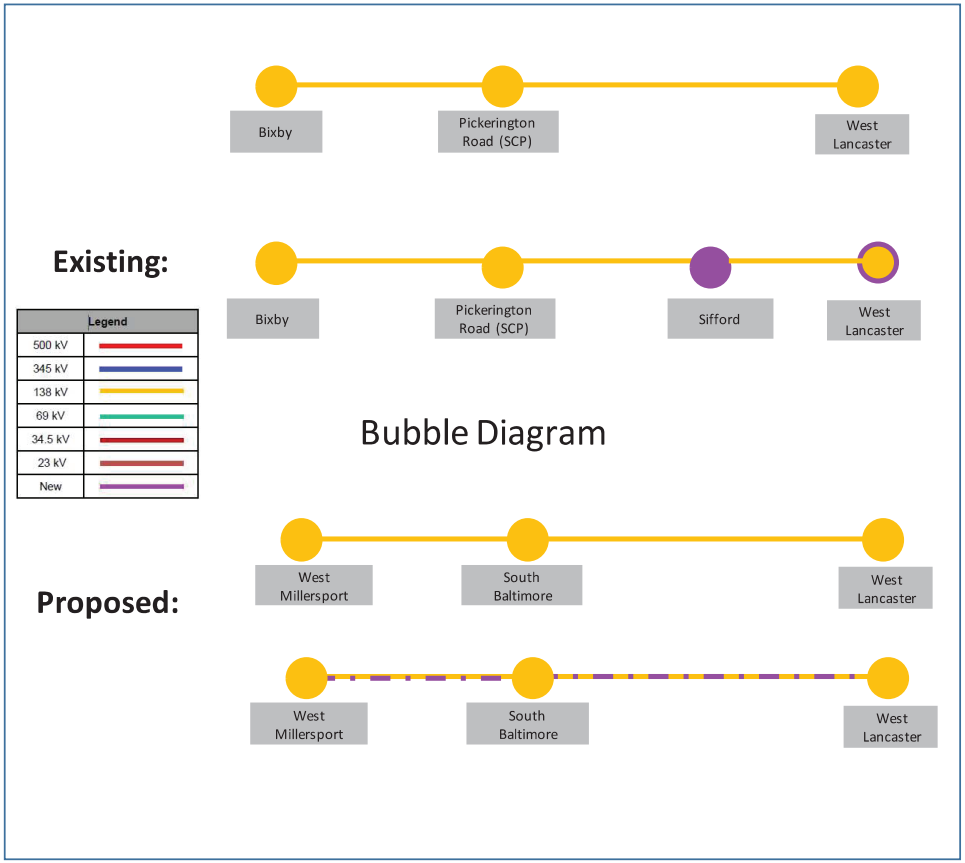
Estimated Cost: $9.645M

Projected In-Service: 5/30/2022

Supplemental Project ID: s2527.1-.7

Project Status: Scoping

Model: 2025 RTEP



Appendix C Agency Coordination

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).

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 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

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

Mike Pettegrew
Environmental Services Administrator (Acting)

From: Teitt, Matthew
To: Kearns, Michelle; Sjollema, Angela; Allen, Charlie
Subject: FW: AEP"s Ruble Station Project, Fairfield County, Ohio
Date: Friday, May 28, 2021 11:43:47 AM
Attachments: pastedImagebase640.png
pastedImagebase641.png

FYI

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

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 ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

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

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

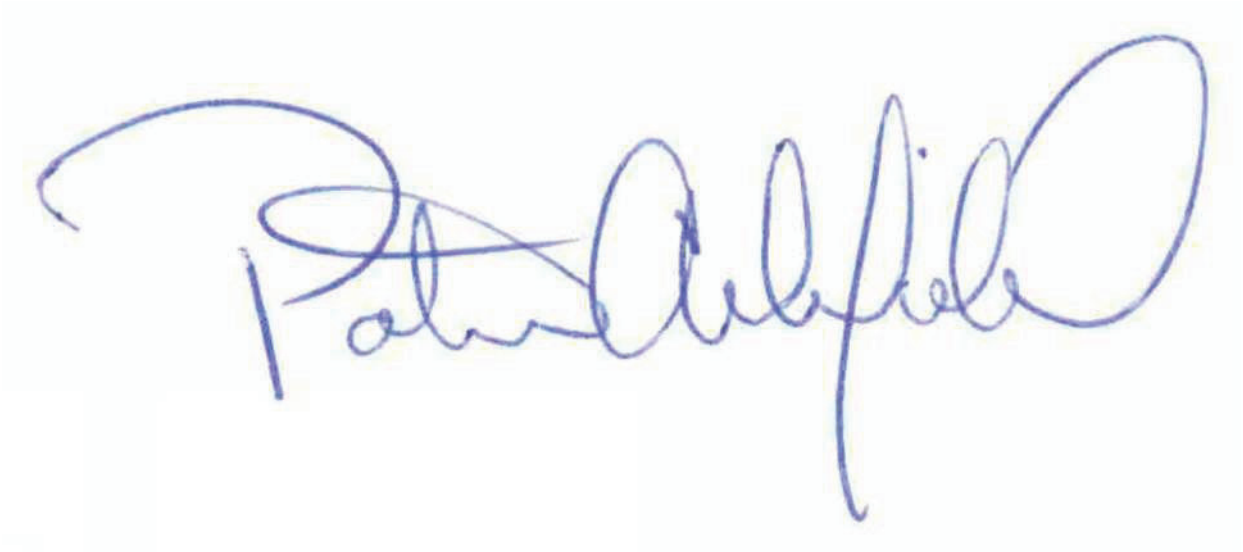
Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing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

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

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

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

Sincerely,



Patrice M. Ashfield
Field Office Supervisor

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

In reply, refer to
2013-FRA-24492

August 26, 2021

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

RE: West Lancaster-Bixby 138kV Transmission Line Tie-ins Associated with the Sifford Station Greenfield Project, Hocking Township, Fairfield County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on August 16, 2021 regarding the proposed West Lancaster-Bixby 138kV Transmission Line Tie-ins Associated with the Sifford Station Greenfield Project, Hocking Township, Fairfield County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the letter report titled *Cultural Resource Management Review for the West Lancaster-Bixby 138kV Transmission Line Tie-ins Associates with the Sifford Station Greenfield Project in Fairfield County, Ohio* by Weller & Associates, Inc. (2021).

The project area was previously surveyed as part of the *Phase I Archaeological Investigation for a 50.6 ha (125 ac) JobsOhio Prospective Site Development Area in Hocking Township, Fairfield County, Ohio* by Weller & Associates, Inc., dated May 25, 2018 and partially previously surveyed as part of the *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* by Weller & Associates, Inc., dated April 22, 2013. Thirteen (13) previously identified archaeological sites are located within the project area; Ohio Archaeological Inventory (OAI)# 33FA1951, 33FA1952, 33FA2356, 33FA2357, 33FA2359-33FA2362, and 33FA2369-33FA2373. All OAI's were previously determined not eligible for listing on the National Register of Historic Places (NRHP). No additional archeological investigation is recommended. The JobsOhio Prospective Site Development project also determined there are no listed or eligible historic resources within the vicinity of the project area.

Based on the information submitted, our office agrees no historic properties will be affected by the proposed project. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1089697

Appendix D Ecological Resources Inventory Report

West Lancaster – Bixby and Sifford – Ruble 138 kV Transmission Lines Project, Fairfield County, Ohio

Ecological Resources Inventory Report

Prepared for:

AEP Ohio Transmission Company, Inc.
8600 Smiths Mill Road
New Albany, OH 43054

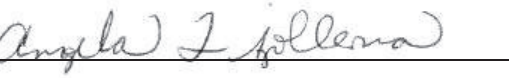
Prepared by:

Stantec Consulting Services Inc.
1500 Lake Shore Drive, Suite 100
Columbus, OH 43204

July 21, 2021

Sign-off Sheet

This document entitled West Lancaster – Bixby and Sifford – Ruble 138 kV Transmission Lines Project Ecological Resources Inventory Report was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of AEP Ohio Transmission Company, Inc. (the "Client"). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by 

(signature)

Angela Sjollema

Reviewed by 

(signature)

Charlie Allen

Reviewed by 

(signature)

Michael de Villiers

Table of Contents

LIST OF TABLES

LIST OF APPENDICES

1.0 INTRODUCTION

AEP Ohio Transmission Company, Inc. (AEP) is constructing two 138 kV transmission lines (West Lancaster – Bixby and Sifford – Ruble) that are associated with the construction of the Sifford Station (the Project) located in the City of Lancaster, Fairfield County, Ohio (Figure 1, Appendix A). The Project area includes an approximately 37-acre parcel where work may occur during construction. The Project area was surveyed for wetlands, waterbodies, open water features, upland drainage features, and potential threatened, endangered, and rare species habitat by Stantec Consulting Services Inc. (Stantec) biologists on April 30, 2021. The approximate locations of features located up to 50 feet outside of the Project area were also recorded during the field surveys, where landowner access was permitted. However, no data forms were collected on features that did not extend into the Project area. These features are shown on the Figure 2 maps in Appendix A as "approximate" wetlands, streams (waterways), open waters, and upland drainage features.

2.0 METHODS

2.1 WETLAND DELINEATION

Prior to completing the field surveys, a desktop review of the Project area was conducted using U.S. Geological Survey (USGS) topographic maps, National Wetlands Inventory (NWI) maps, U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey data, and aerial imagery mapping. Stantec completed a wetland delineation study in accordance with the *Corps of Engineers Wetlands Delineation Manual* (USACE Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region* (Version 2.0; USACE 2010). Wetland categories were classified using the Ohio Rapid Assessment Method (ORAM) for Wetlands Version 5.0 (Mack 2001).

2.2 STREAM DELINEATION

Streams that demonstrated a continuously defined channel (bed and bank), ordinary high water mark (OHWM), and the disturbance of terrestrial vegetation were delineated within the Project area, per the protocols outlined in the USACE's Guidance on Ordinary High Water Mark Identification (Regulatory Guidance Letter, No. 05-05; USACE 2005). Delineated streams were classified as ephemeral, intermittent, or perennial per definitions in the 22250 Federal Register/Vol. 85, No. 77 (effective June 22, 2020; USACE 2020). Functional assessment of streams within the Project area was based on completion of the Ohio Environmental Protection Agency's (OEPA) Headwater Habitat Evaluation Index (HHEI; OEPA 2018) and/or Qualitative Habitat Evaluation Index (QHEI; OEPA 2006). The centerline and/or the OHWM locations of each waterway are identified and surveyed using a handheld sub-meter accuracy global positioning system (GPS) unit and mapped with GIS software. Additionally, the locations of upland drainage features (which lacked a continuously defined bed and bank/OHWM) identified within the Project area are also recorded with a sub-meter accuracy GPS unit during the field surveys.

2.3 RARE SPECIES

Prior to conducting the field surveys, Stantec contacted the Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service (USFWS) for information regarding rare, threatened, or endangered species and their habitats of concern within the vicinity of the Project area (Appendix F – Agency Correspondence). To assess potential impacts to rare, threatened, or endangered species, Stantec scientists conducted a pedestrian reconnaissance of the Project area, collected information on existing habitats within the Project area, and assessed the potential for these habitats to be used by these species.

3.0 RESULTS

3.1 TERRESTRIAL HABITAT

Stantec completed field surveys within the Project area on April 30, 2021, for potentially suitable habitats for threatened and endangered species. Figure 3 (Appendix A) shows the land cover, vegetation communities, and any identified rare, threatened, or endangered species habitats observed within the Project area during the habitat assessment surveys. Representative photographs of the vegetation communities/habitats identified within the Project area are included in Appendix B of this report (photo locations are shown on Figure 3 in Appendix A). Information regarding the vegetation communities/habitats identified within the Project area is provided in Table 1.

Table 1. Vegetation Communities and Land Cover Found within the West Lancaster – Bixby and Sifford – Ruble 138 kV Transmission Lines Project Area, Fairfield County, Ohio

Vegetation Communities and Land Cover Types within the Project Area	Degree of Human-Related Ecological Disturbance	Unique, Rare, or High Quality?	Approximate Acreage Within Project Area
Fallow Field	Extreme Disturbance/ Ruderal Community (dominated by opportunistic invaders or native highly tolerant taxa). Dominant plant species included henbit (*Lamium amplexicaule*), common dandelion (*Taraxacum officinale*), yellow bristle grass (*Setaria pumila*), alsike clover (*Trifolium hybridum*), shepherd's purse (*Capsella bursa-pastoris*), Kentucky blue grass (*Poa pratensis*), soybean (*Glycine max*), and corn (*Zea mays*).	No	37.13
		TOTAL	**37.13**

3.2 WETLANDS

No wetlands were delineated within the Project area during the field surveys on April 30, 2021.

3.3 STREAMS

No streams were delineated within the Project area during the field surveys on April 30, 2021.

3.4 OPEN WATERS

No open water (i.e., ponds, lakes) were delineated within the Project area during the field surveys completed on April 30, 2021.

3.5 RARE, THREATENED, OR ENDANGERED SPECIES HABITAT

Table 2. Summary of Potential Federal and Ohio State-Listed Species within the West Lancaster – Bixby and Sifford – Ruble 138 kV Transmission Lines Project Area, Fairfield County, Ohio

Common/Scientific Names	*State Listed Status	*Federally Listed Status	Typical Habitat	Habitat Observed	Agency Comment** (Appendix C)	Potential Impacts and Avoidance Dates
Northern Brook Lamprey/ *Ichthyomyzon fossor*	E	N/A	Habitat includes clean, clear gravel riffles and runs of small rivers (Page and Burr 2011); this species usually does not occur in large rivers or small brooks. Usually it occurs over gravel or sand-silt bottoms in moderately warm water, generally unsuitable for brook trout (Becker 1983). Larvae burrow into sand-silt bottoms in eddies. Spawning occurs in coarse gravelly or stony bottoms of creeks or small rivers in areas of strong current (NatureServe 2021).	No suitable habitat was observed within the Project area.	ODNR - The Project is within the range of this species. If no in-water work is proposed in a perennial stream, the Project is not likely to impact this species. USFWS - No comments received.	No suitable habitat was observed within the Project area. Therefore, no impacts to this species are anticipated.
Popeye Shiner/ *Notropis ariommus*	E	N/A	Habitat includes warm, relatively clear flowing waters of large creeks and small to medium rivers; these shiners are closely associated with gravel substrate; typically they occur in runs, backwaters near appreciable current, and the head of pools (NatureServe 2021).	No suitable habitat was observed within the Project area.	ODNR - The Project is within the range of this species. If no in-water work is proposed in a perennial stream, the Project is not likely to impact this species. USFWS - No comments received.	No suitable habitat was observed within the Project area. Therefore, no impacts to this species are anticipated.
Trumpeter Swan/ *Cygnus buccinator*	T	N/A	Ponds, lakes, and marshes, breeding in areas of reeds, sedges or similar emergent vegetation, primarily on freshwater, occasionally in brackish situations, wintering on open ponds, lakes and sheltered bays and estuaries (AOU 1983). In the intermountain western U.S., winters in areas of geothermal activity, springs, and dam outflows (Spahr et al. 1991). Primarily breeds in freshwater, on edges of large inland waters; typically in emergent marsh vegetation, or on a muskrat house, beaver lodge, or island. The nest is a large mass of plant material. Uses same nesting sites in successive years (NatureServe 2021).	No suitable habitat was observed within the Project area.	ODNR - The Project is within the range of this species. This species prefers large marshes and lakes with a mix of emergent and submergent vegetation and open water. If this type of habitat will not be impacted, the Project is not likely to impact this species. USFWS - No comments received.	No suitable habitat was observed within the Project area. Therefore, no impacts to this species are anticipated.
Indiana Bat/ *Myotis sodalis*	E	E	The Indiana bat is likely distributed over the entire State of Ohio, though not uniformly. This species generally forages in openings and edge habitats within upland and floodplain forest, but they also forage over old fields and pastures (Brack et al. 2010). Natural roost structures include trees (live or dead) with exfoliating bark, and exposure to solar radiation. Other important factors for roost trees include relative location to other trees, a permanent water source and foraging areas. Dead trees are preferred as maternity roosts; however, live trees are often used as secondary roosts depending on microclimate conditions (USFWS 2007, USFWS 2020b). Roosts have also occasionally been found to consist of cracks and hollows in trees, utility poles, buildings, and bat boxes. Primarily use caves for hibernacula, although are also known to hibernate in abandoned underground mines (Brack et al. 2010).	No suitable winter hibernacula or summer roost habitat were observed in the Project area.	ODNR - This Project lies within the range of the Indiana bat. Therefore, ODNR DOW recommends that habitat be conserved wherever possible. If suitable habitat occurs within the Project area and trees need to be cut, the ODNR DOW recommends cutting occur between October 1 and March 31. USFWS - If the proposed Project area contains trees ≥3 inches dbh, the USFWS recommends that trees be saved wherever possible. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, USFWS recommends that removal of any trees ≥3 inches dbh only occur between October 1 and March 31.	No suitable winter hibernacula or summer habitat were observed in the Project area. Therefore, no impacts to this species are anticipated.

Common/Scientific Names	*State Listed Status	*Federally Listed Status	Typical Habitat	Habitat Observed	Agency Comment** (Appendix C)	Potential Impacts and Avoidance Dates
Little Brown Bat/ *Myotis lucifugus*	E	N/A	The little brown bat uses a wide range of habitats and often use human-made structures for resting and maternity sites; they also use caves and hollow trees. Foraging habitat requirements are generalized; foraging occurs over water, along the margins of lakes and streams, or in woodlands near water. Winter hibernation sites (caves, tunnels, abandoned mines, and similar sites) generally have a relatively stable temperature of about 2-12 °C (see Kunz and Reichard 2010). Maternity colonies commonly are in warm sites in buildings (e.g., attics) and other structures; also infrequently in hollow trees. Microclimate conditions suitable for raising young are relatively narrow, and availability of suitable maternity sites may limit the species' abundance and distribution (NatureServe 2021).	No suitable winter hibernacula or summer roost habitat were observed in the Project area.	ODNR - This Project lies within the vicinity of records for the little brown bat. Therefore, ODNR DOW recommends that habitat be conserved wherever possible. If suitable habitat occurs within the Project area and trees need to be cut, the ODNR DOW recommends cutting occur between October 1 and March 31. USFWS - No comments received.	No suitable winter hibernacula or summer habitat were observed in the Project area. Therefore, no impacts to this species are anticipated.
Northern Long-eared Bat/ *Myotis septentrionalis*	T	T	The northern long-eared bat is found throughout Ohio. This species generally forages in forested habitat and openings in forested habitat and utilizes cracks, cavities, and loose bark within live and dead trees, as well as buildings as roosting habitat (Brack et al. 2010; USFWS 2020a). The species utilizes caves and abandoned mines as winter hibernacula. Various sized caves are used providing they have a constant temperature, high humidity, and little to no air current (Brack et al. 2010).	No suitable winter hibernacula or summer roost habitat were observed in the Project area.	ODNR - This Project lies within the range of the northern long-eared bat. Therefore, ODNR DOW recommends that habitat be conserved wherever possible. If suitable habitat occurs within the Project area and trees need to be cut, the ODNR DOW recommends cutting occur between October 1 and March 31. USFWS - If the proposed Project area contains trees ≥3 inches dbh, the USFWS recommends that trees be saved wherever possible. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, USFWS recommends that removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule.	No suitable winter hibernacula or summer habitat were observed in the Project area. Therefore, no impacts to this species are anticipated.
Tricolored Bat/ *Perimyotis subflavus*	E	N/A	These bats are associated with forested landscapes, where they forage near trees (including forest perimeters) and along waterways (Fujita and Kunz 1984). In many areas, most foraging occurs in riparian areas (e.g., Ellis et al. 2002, Ford et al. 2005, Menzel et al. 2005). In Nova Scotia, they appeared to use primarily areas with intact, unfragmented forest cover (Farrow and Broders 2011). In spring and summer in deciduous forest in western North Carolina, nonreproductive individuals selected mature stands or buffer zones near perennial streams, and they tended to roost near openings (perhaps to minimize commuting costs when openings comprise a small proportion of a densely forested landscape) (O'Keefe et al. 2009) (NatureServe 2021).	No suitable winter hibernacula or summer roost habitat were observed in the Project area.	ODNR - This Project lies within the range of the tricolored bat. Therefore, ODNR DOW recommends that habitat be conserved wherever possible. If suitable habitat occurs within the Project area and trees need to be cut, the ODNR DOW recommends cutting occur between October 1 and March 31. USFWS - No comments received.	No suitable winter hibernacula or summer habitat were observed in the Project area. Therefore, no impacts to this species are anticipated.

*Status key: E=Endangered; T=Threatened; PT=Potentially Threatened; SC=Species of Concern

**The information is based on the literature review response information from ODNR and USFWS and is study area/project specific.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Stantec conducted a wetland and waterbodies delineation and a preliminary habitat assessment for threatened and endangered species within the Project area on April 30, 2021. During the field surveys, no wetlands or streams were observed within the Project area.

The information provided by Stantec regarding wetland and stream boundaries is based on an analysis of the wetland and upland conditions present within the Project area at the time of the field work. The delineations were performed by experienced and qualified professionals using regulatory agency-accepted practices and sound professional judgment.

An ODNR Ohio Natural Heritage Program data request and environmental review request letter was sent to the ODNR Office of Real Estate on May 10, 2021. The ODNR Office of Real Estate response letter dated June 30, 2021, stated that the Project area lies within the vicinity of records for the little brown bat. Because presence 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 the buffer may be acceptable after further coordination with ODNR Division of Wildlife (DOW). In addition, the Project is within the range of the Indiana bat, the northern long-eared bat, and the tricolored bat. The DOW recommends tree cutting only occur from October 1 to March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥20 inches 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. The desktop assessment identified an inactive surface mine within 0.25 miles of the Project area; however aerial mapping indicated that the mine is currently a reservoir and therefore not likely suitable as potential bat hibernaculum. Figure 4, Appendix A details the location of the reservoir in relation to the Project area. The Project area does not contain any potentially suitable foraging or roosting habitat for the listed bat species.

According to the ODNR response letter, the Project is within the range of the state-listed endangered northern brook lamprey and popeye shiner. The DOW recommends no in-water work in perennial streams from March 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat. However, if no in-water work is proposed in a perennial stream, this Project is not likely to impact these species. No in-water work is proposed to occur for this Project in perennial streams; therefore, impacts to these species are not anticipated for the Project.

The project is within range of the trumpeter swan, a state-listed threatened species. This species 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 any impacts on this species. No wetlands or open water (ponds)

are located within the Project area; therefore, impacts to this species are not anticipated for the Project.

The Project is also within a one-mile radius of the following unique sites: a mussel bed, Rock Mill Lake Wildlife Area, and Lange Easement – Appalachia Ohio Alliance.

A technical assistance request letter was also submitted to the USFWS on May 10, 2021. The USFWS response letter dated May 28, 2021, recommends that the proposed Project avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Best management practices should be utilized to minimize erosion, especially on slopes.

According to the USFWS response (Appendix C), all projects in the State of Ohio lie within range of the federally endangered Indiana bat and the federally threatened northern long-eared bat. In Ohio presence of these species are assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. The USFWS response letter stated that should the Project site contain trees ≥3 inches dbh, the USFWS recommends trees be saved whenever possible. If any caves or abandoned mines may be disturbed, further coordination is requested. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, the USFWS recommends that removal of trees ≥3 inches dbh only occur between October 1 and March 31. If there is a federal nexus, no tree clearing should occur in the Project area until Section 7 consultation is complete. No hibernacula for these species were observed within the Project area. The Project area does not contain any potentially suitable foraging and roosting habitat for the Indiana bat and northern long-eared bat.

The USFWS stated that they do not anticipate adverse effects to any other federally endangered, threatened, proposed or candidate species due to the Project type, size, and location (Appendix C).

5.0 REFERENCES

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USFWS. 2020b. 2020 Range-wide Indiana Bat Survey Guidelines, March 2020. Available at https://www.fws.gov/midwest/endangered/mammals/inba/surveys/pdf/FINAL%20Range-wide%20IBat%20Survey%20Guidelines%203.23.20.pdf. Accessed May 2021.

Appendix A FIGURES

A.1 PROJECT LOCATION MAP

Figure No.
1

Title
Project Location Map

Client/Project
AEP Ohio Transmission Company, Inc.
West Lancaster – Bixby and Sifford – Ruble
138 kV Transmission Lines Project

Project Location
Fairfield County, Ohio

Prepared by JLH on 2021-01-22
TR by DA on 2021-01-12
IR by MDH on 2021-01-13

N

0 1,000 2,000
Feet
(At original document size of 11x17)
1:24,000

Legend
Project Area

Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources: Stantec, AEP, ESRI, USGS, NAIP
3. Background: USGS 7.5' Topographic Quadrangle: Amanda, OH (1995)

Stantec

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

A.2 WETLAND AND WATERBODY DELINEATION MAP

Figure No.
2

Title
Wetland and Waterbody Delineation Map

Client/Project
AEP Ohio Transmission Company, Inc.
West Lancaster – Bixby and Sifford – Rubie
138 kV Transmission Lines Project

Project Location
Fairfield County, Ohio

Prepared by JM on 2021-05-05
TR by DA on 2021-07-12
IR by MDH on 2021-07-13

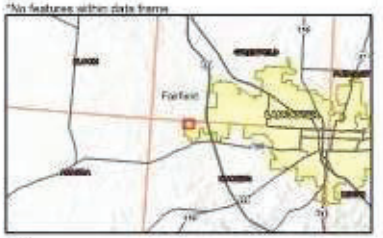
N

0 75 150 Feet
(At original document size of 11x17)
1:1,800

Legend
- Project Area
- Proposed Facility
- Proposed Access Road
- Existing Transmission Line
- Proposed Transmission Line
- Photo Location
- Culvert
- Upland Drainage Feature
- Approximate Upland Drainage Feature
- Approximate Waterway
- Approximate Open Water
- Approximate Wetland
- National Wetlands Inventory Feature

FEMA Flood Hazard Area*
- 100-year Floodplain
- Floodway

*No features within data frame



Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources: Stantec, AEP, USGS, FEMA, ODNR, NAIP
3. Orthophotography: 2019 NAIP

Stantec

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A.3 HABITAT ASSESSMENT MAP

Figure No.
3

Title
Habitat Assessment Map

Client/Project
AEP Ohio Transmission Company, Inc.
West Lancaster – Bixby and Sifford – Ruble
138 kV Transmission Lines Project

Project Location
Fairfield County, Ohio

Prepared by JM on 2021-05-05
TR by DA on 2021-07-12
IR by MDH on 2021-07-13

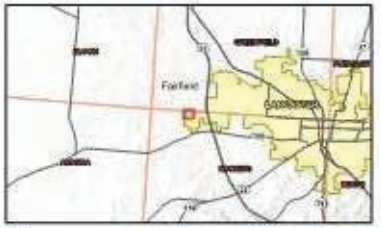
N

0 75 150 Feet
(At original document size of 11x17)
1:1,800

Legend

- Project Area
- Proposed Facility
- Proposed Access Road
- Existing Transmission Line
- Proposed Transmission Line
- Photo Location
- Upland Drainage Feature
- Approximate Upland Drainage Feature
- Approximate Waterway
- Approximate Open Water
- Approximate Wetland

Habitat Area
- Fallow Field



Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources: Stantec, AEP, USGS, NAIP
3. Orthophotography: 2019 NAIP

Stantec

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

A.4 BAT HIBERNACULA DESKTOP STUDY MAP

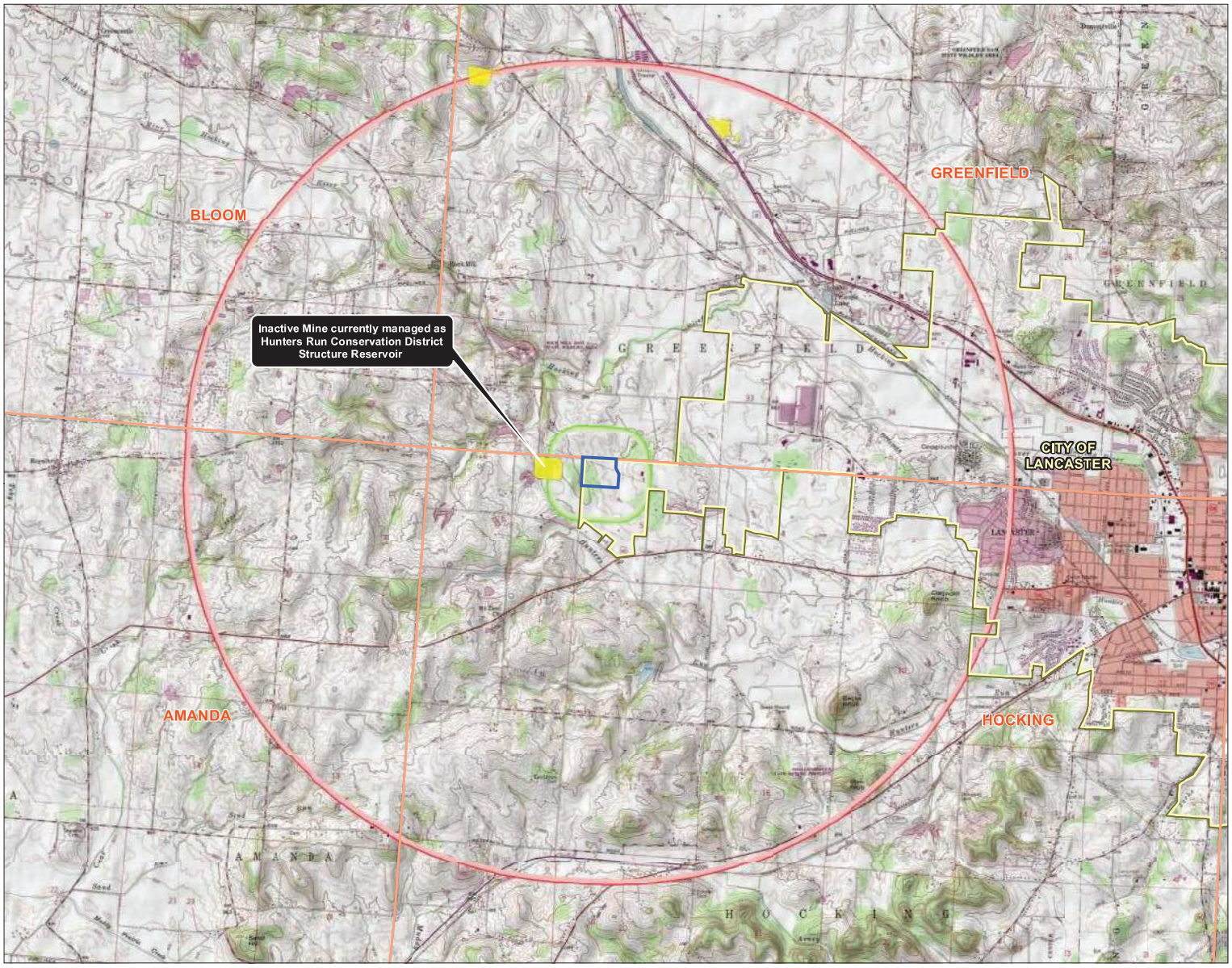


Figure No.
4

Title
Bat Hibernacula Desktop Study Map

Client/Project 193708314
AEP Ohio Transmission Company, Inc.
West Lancaster-Bixby and Sifford-Ruble
138 kV Transmission Lines Project

Project Location
Fairfield County, Ohio

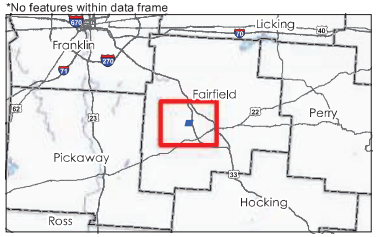
Prepared by JLH on 2021-07-07
TR by CA on 2021-07-16
IR by MT on 2021-07-16

N

0 2,000 4,000 Feet
(At original document size of 11x17)
1:48,000

Legend
- Project Area
- 0.25-Mile Project Area Buffer
- 3-Mile Project Area Buffer
- Abandoned Mine*
- Inactive Mine*
- Active Mine*
- Abandoned Mine Area*
- Inactive Mine Area
- Active Mine Area*
- Karst Feature*
- Area of Karst Geology*
- Township Boundary
- Municipal Boundary

*No features within data frame



1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources: Stantec, AEP, USGS, ODNR, NADS
3. Background: USGS 7.5' Topographic Quadrangles - Amanda, OH (1985)

Stantec

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Appendix B REPRESENTATIVE PHOTOGRAPHS

B.1 WETLAND AND WATERBODY PHOTOGRAPHS

Photo Location 1. View of upland drainage feature (UDF). Photograph taken facing west.

Photo Location 1. View of UDF. Photograph taken facing east.

Photo Location 2. View of UDF. Photograph taken facing west.

Photo Location 2. View of UDF. Photograph taken facing east.

Photo Location 3. View of UDF. Photograph taken facing southwest.

Photo Location 3. View of UDF. Photograph taken facing northeast.

Photo Location 4. View of UDF draining into a culvert. Photograph taken facing east.

Photo Location 4. View of UDF draining into a culvert. Photograph taken facing east.

B.2 HABITAT PHOTOGRAPHS

Photo Location 1. View of fallow field. Photograph taken facing east.

Photo Location 1. View of fallow field. Photograph taken facing south.

Photo Location 2. View of fallow field. Photograph taken facing north.

Appendix C AGENCY CORRESPONDENCE

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).

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 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

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

Mike Pettegrew
Environmental Services Administrator (Acting)

From: Teitt, Matthew
To: Kearns, Michelle; Sjollema, Angela; Allen, Charlie
Subject: FW: AEP"s Ruble Station Project, Fairfield County, Ohio
Date: Friday, May 28, 2021 11:43:47 AM
Attachments: pastedImagebase640.png
pastedImagebase641.png

FYI

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

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 ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

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

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

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

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

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

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

Sincerely,

Patrice M. Ashfield
Field Office Supervisor

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

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/8/2021 11:51:47 AM

in

Case No(s). 21-0975-EL-BNR

Summary: Notice Construction Notice electronically filed by Hector Garcia-Santana on behalf of Ohio Power Company