

Appendix F.

Representative Photographs

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 1



Wetland GS-01 (PFO), facing north on June 28, 2021.

PHOTOGRAPH 2



Wetland GS-01 (PFO), facing south on June 28, 2021.

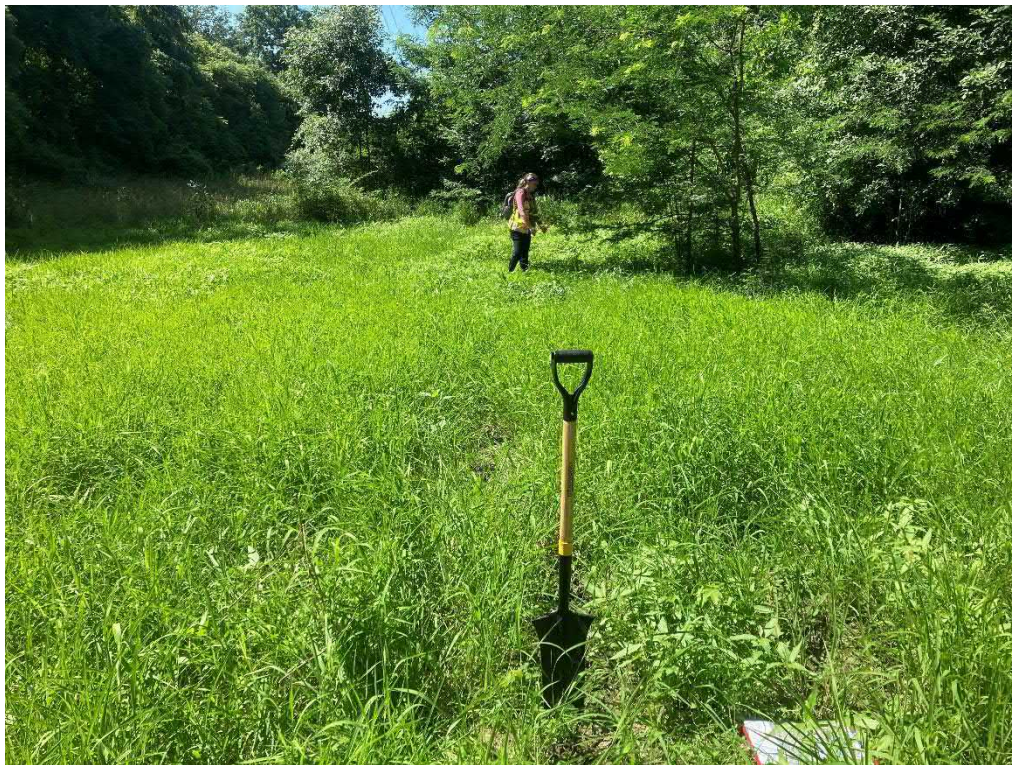
**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 3



Wetland GS-01 (PEM), facing north on June 28, 2021.

PHOTOGRAPH 4



Wetland GS-01 (PEM), facing south on June 28, 2021.

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PHOTOGRAPH 5



Wetland GS-02 (PEM), facing north on June 28, 2021.

PHOTOGRAPH 6



Wetland GS-02 (PEM), facing south on June 28, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 7



Wetland GS-02 (PSS), facing north on June 28, 2021.

PHOTOGRAPH 8



Wetland GS-02 (PSS), facing south on June 28, 2021.

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PHOTOGRAPH 9



Wetland GS-03 (PFO), facing north on June 28, 2021.

PHOTOGRAPH 10



Wetland GS-03 (PFO), facing south on June 28, 2021.

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PHOTOGRAPH 11



Wetland GS-03 (PEM), facing north on June 28, 2021.

PHOTOGRAPH 12



Wetland GS-03 (PEM), facing south on June 28, 2021.

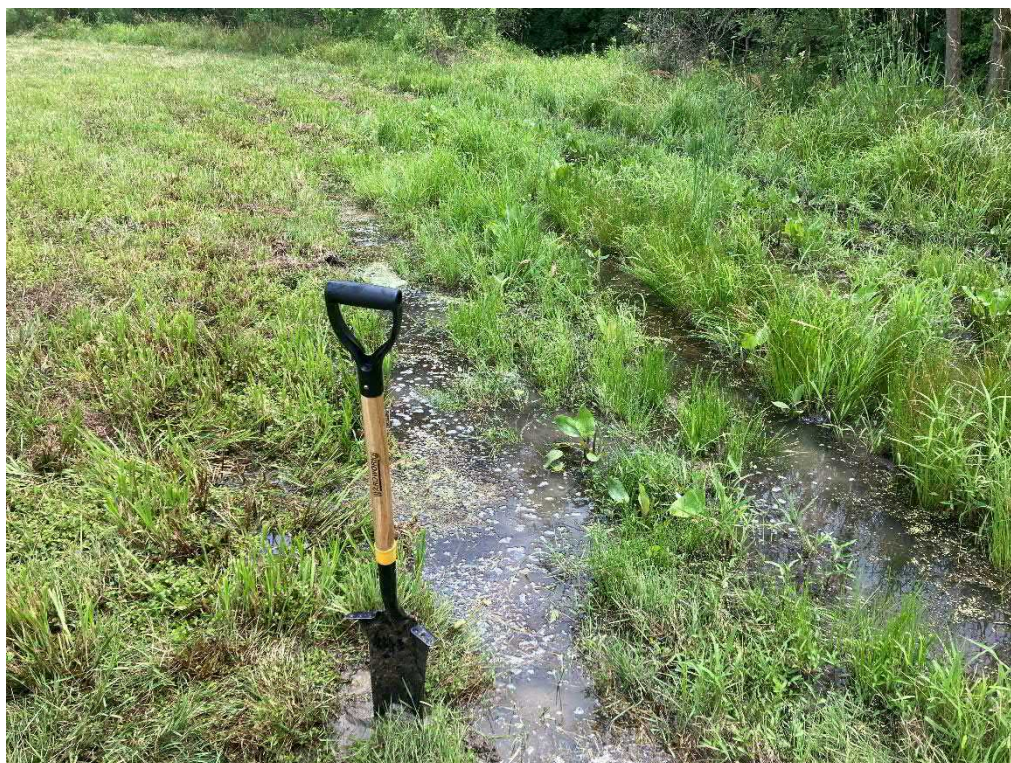
**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 13



Wetland GS-05 (PEM), facing north on June 28, 2021.

PHOTOGRAPH 14



Wetland GS-05 (PEM), facing south on June 28, 2021.

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(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 15



Wetland GS-05 (PUB), facing south on June 28, 2021.

PHOTOGRAPH 16



Wetland GS-06 (PSS), facing north on June 28, 2021.

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(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 17



Wetland GS-06 (PSS), facing south on June 28, 2021.

PHOTOGRAPH 18



Wetland GS-07 (PEM), facing north on June 28, 2021.

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PHOTOGRAPH 19



Wetland GS-07 (PEM), facing east on June 28, 2021.

PHOTOGRAPH 20



Wetland GS-08 (PEM), facing northwest on June 29, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 21



Wetland GS-08 (PEM), facing southeast on June 29, 2021.

PHOTOGRAPH 22



Wetland GS-09 (PEM), facing north on June 29, 2021.

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PHOTOGRAPH 23



Wetland GS-09 (PEM), facing south on June 29, 2021.

PHOTOGRAPH 24



Wetland GS-10 (PFO), facing north on June 29, 2021.

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PHOTOGRAPH 25



Wetland GS-10 (PFO), facing south on June 29, 2021.

PHOTOGRAPH 26



Wetland GS-11 (PFO), facing east on June 29, 2021.

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PHOTOGRAPH 27



Wetland GS-11 (PFO), facing west on June 29, 2021.

PHOTOGRAPH 28



Wetland GS-12 (PEM), facing west on June 29, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 29



Wetland GS-12 (PEM), facing east on June 29, 2021.

PHOTOGRAPH 30



Wetland GS-13 (PEM), facing west on July 8, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 31



Wetland GS-13 (PEM), facing south on July 8, 2021.

PHOTOGRAPH 32



Wetland GS-14 (PFO), facing north on July 8, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 33



Wetland GS-14 (PFO), facing south on July 8, 2021.

PHOTOGRAPH 34



Wetland SS-01 (PSS), facing north on January 28, 2020.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 35



Wetland SS-01 (PSS), facing south on January 28, 2020.

PHOTOGRAPH 36



Wetland AS-02 (PEM), facing north on February 19, 2020.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 37



Wetland AS-02 (PEM), facing north on February 19, 2020.

PHOTOGRAPH 38



Wetland AS-03 (PEM), facing north on January 28, 2020.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 39



Wetland AS-03 (PEM), facing south on January 28, 2020.

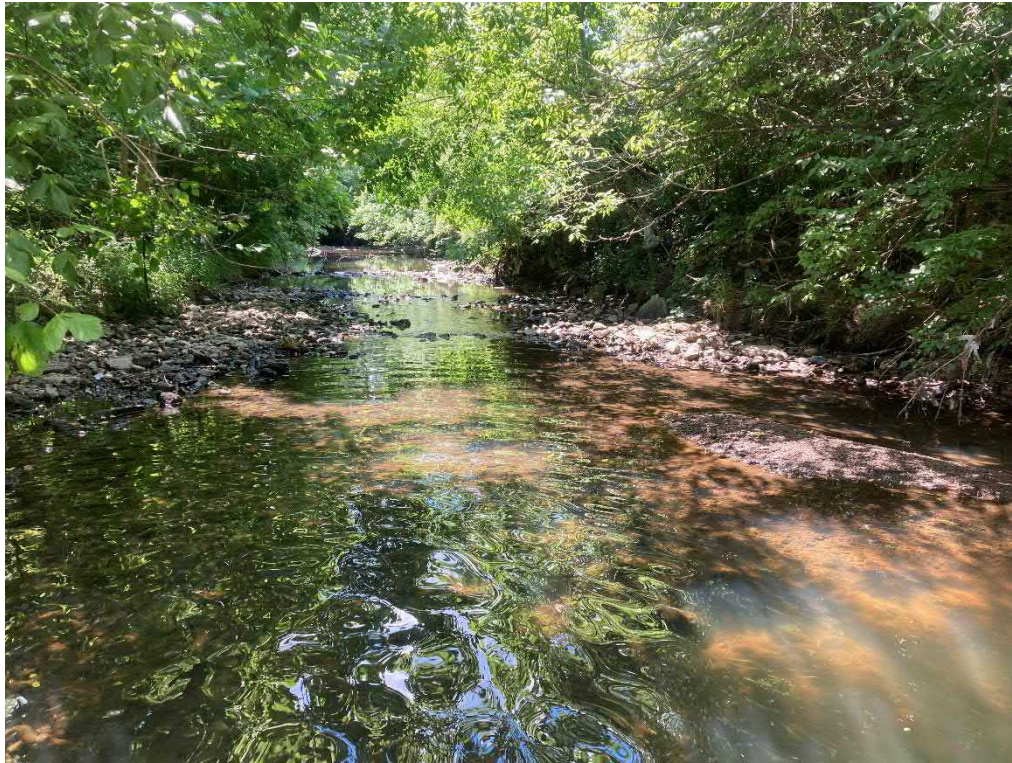
PHOTOGRAPH 40



Stream GS-01 (Mason Run) – Perennial, facing upstream on June 28, 2020.

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PHOTOGRAPH 41



Stream GS-01 (Mason Run) – Perennial, facing downstream on June 28, 2021.

PHOTOGRAPH 42



Stream GS-01 (Mason Run) – substrate on June 28, 2021.

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PHOTOGRAPH 43



Stream GS-02 (UNT to Mason Run) – Intermittent, facing upstream on June 28, 2021.

PHOTOGRAPH 44



Stream GS-02 (UNT to Mason Run) – Intermittent, facing downstream on June 28, 2021.

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PHOTOGRAPH 45



Stream GS-02 (UNT to Mason Run) – Intermittent, substrate on June 28, 2021

PHOTOGRAPH 46



Stream GS-03 (Big Walnut Creek) – Perennial, facing upstream on June 28, 2021.

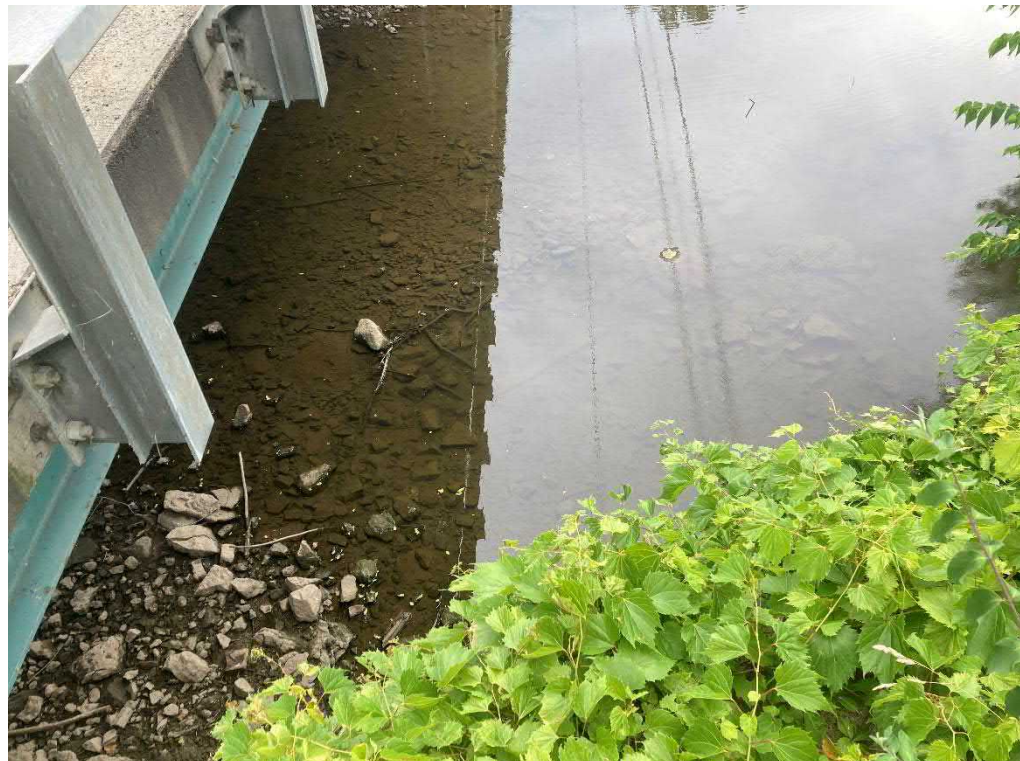
**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 47



Stream GS-03 (Big Walnut Creek) – Perennial, facing downstream on June 28, 2021.

PHOTOGRAPH 48



Stream GS-03 (Big Walnut Creek) – Perennial, substrate on June 28, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 4



Stream GS-04 (Blacklick Creek) – Perennial, facing upstream on June 28, 2021.

PHOTOGRAPH 50



Stream GS-04 (Blacklick Creek) – Perennial, facing downstream on June 28, 2021.

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PHOTOGRAPH 51



Stream GS-04 (Blacklick Creek) – Perennial, substrate on June 28, 2021.

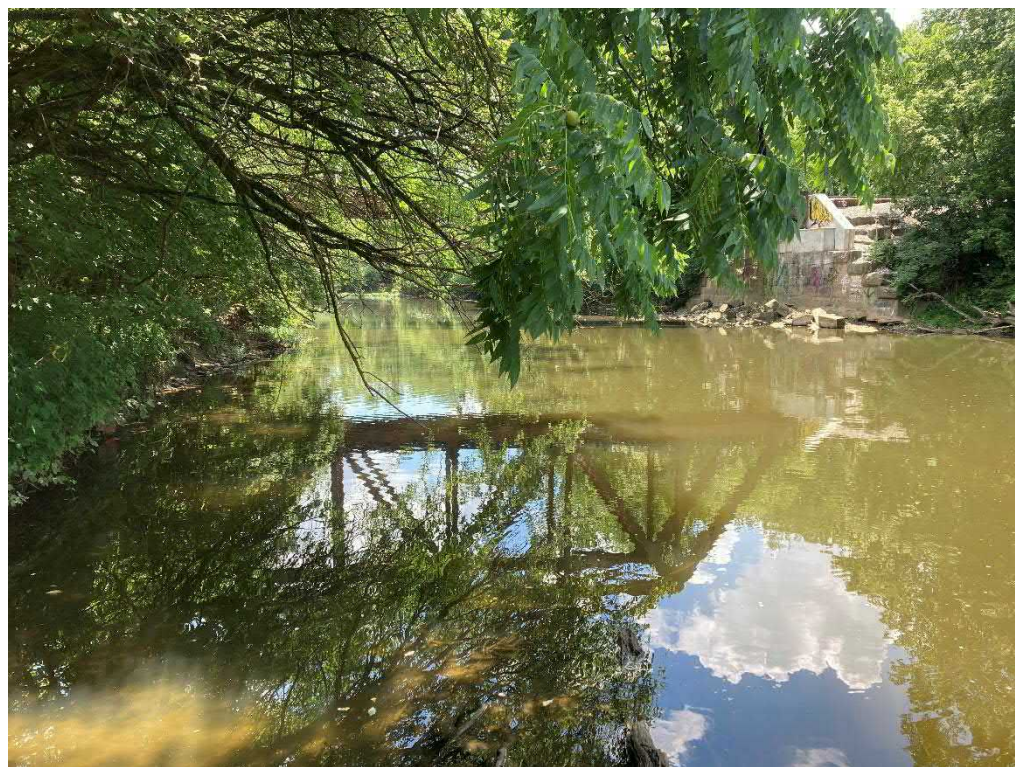
PHOTOGRAPH 52



Stream GS-05 (Big Walnut Creek) – Perennial, facing upstream on June 29, 2021.

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PHOTOGRAPH 53



Stream GS-05 (Big Walnut Creek) – Perennial, facing downstream on June 29, 2021.

PHOTOGRAPH 54



Stream GS-05 (Big Walnut Creek) – Perennial, facing downstream on June 29, 2021.

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PHOTOGRAPH 55



Stream GS-06 (UNT to Big Walnut Creek) – Perennial, facing upstream on July 8, 2021.

PHOTOGRAPH 56



Stream GS-06 (UNT to Big Walnut Creek) – Perennial, facing downstream on July 8, 2021.

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PHOTOGRAPH 57



Stream GS-06 (UNT to Big Walnut Creek) – Perennial, substrate on July 8, 2021.

PHOTOGRAPH 58



Stream AS-06 (UNT to Blacklick Creek) – Perennial, facing upstream on February 19, 2020.

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PHOTOGRAPH 59



Stream AS-06 (UNT to Blacklick Creek) – Perennial, facing downstream on February 19, 2020.

PHOTOGRAPH 60



Stream AS-06 (UNT to Blacklick Creek) – Perennial, substrate on February 19, 2020.

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PHOTOGRAPH 61



Stream AS-07 (Blacklick Creek) – Perennial, facing upstream on February 19, 2020.

PHOTOGRAPH 62



Stream AS-07 (Blacklick Creek) – Perennial, facing downstream on February 19, 2020.

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PHOTOGRAPH 63



Stream AS-07 (Blacklick Creek) – Perennial, substrate on February 19, 2020.

PHOTOGRAPH 64



Stream AS-08 (UNT to Blacklick Creek) – Perennial, facing upstream on April 20, 2021.

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PHOTOGRAPH 65



Stream AS-08 (UNT to Blacklick Creek) – Perennial, facing downstream on April 20, 2021.

PHOTOGRAPH 66



Stream AS-08 (UNT to Blacklick Creek) – Perennial, substrate on April 20, 2021.

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PHOTOGRAPH 67



Pond GS-01, facing north on June 28, 2021.

PHOTOGRAPH 68



Pond GS-02, facing west on June 28, 2021.

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PHOTOGRAPH 69



Pond GS-03, facing west on June 28, 2021.

PHOTOGRAPH 70



Pond GS-04, facing southwest on June 28, 2021.

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PHOTOGRAPH 71



Pond GS-05, facing south on June 28, 2021.

PHOTOGRAPH 72



Pond GS-06, facing southeast on June 28, 2021.

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PHOTOGRAPH 73



Pond GS-07, facing west on June 28, 2021.

PHOTOGRAPH 74



Pond GS-08, facing east on June 28, 2021.

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PHOTOGRAPH 75



Pond GS-09, facing west on June 29, 2021.

PHOTOGRAPH 76



Pond GS-09, facing west on June 29, 2021.

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PHOTOGRAPH 77



Pond GS-11, facing east on July 8, 2021.

PHOTOGRAPH 78



Pond GS-12, facing south on July 8, 2021.

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PHOTOGRAPH 79



Upland GS-01, facing south on July 8, 2021.

PHOTOGRAPH 80



Upland GS-02, facing west on June 28, 2021.

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PHOTOGRAPH 81



Upland GS-03, facing north on July 8, 2021.

PHOTOGRAPH 82



Upland GS-05, facing north on June 28, 2021.

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PHOTOGRAPH 83



Upland GS-06, facing northeast on July 8, 2021.

PHOTOGRAPH 84



Upland GS-07, facing south on June 28, 2021.

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PHOTOGRAPH 85



Upland GS-08, facing northeast on June 29, 2021.

PHOTOGRAPH 86



Upland GS-09, facing northwest on June 29, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 87



Upland GS-10, facing north on June 29, 2021.

PHOTOGRAPH 88



Upland GS-11, facing east on June 29, 2021.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
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PHOTOGRAPH 89



Upland GS-12, facing west on June 29, 2021.

PHOTOGRAPH 90



Upland GS-13, facing north on July 8, 2021.

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PHOTOGRAPH 91



Upland GS-14, facing north on July 8, 2021.

PHOTOGRAPH 92



Upland SS-01, facing north on January 28, 2020.

**GROVES – SHANNON 138 KV TRANSMISSION LINE PROJECT
(PREFERRED AND ALTERNATE ROUTES) WETLAND DELINEATION**

PHOTOGRAPH 93



Upland AS-2, facing north on February 19, 2021.

PHOTOGRAPH 94



Upland AS-03, facing north on February 19, 2020.

Appendix G.

Threatened and Endangered Species Coordination



Ohio Department of Natural Resources

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September 13, 2021

Bradley Rolfes
WSP USA
Suite 2500
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Cincinnati, OH 45202

Re: 21-0780; Groves Road – Shannon 138 kV Transmission Line Rebuild Project Preferred Route

Project: The proposed project involves the extension of the existing transmission line exiting Groves Road Station east and south to existing transmission lines in the vicinity and ultimately to the Shannon Station.

Location: The proposed project is located in Madison Township, Franklin 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 data at or within a one mile radius of the project area:

Tippecanoe darter (*Etheostoma tippecanoe*), T
Pickerington Ponds Metro Park – Columbus & Franklin Co. Metro Parks
Blacklick Greenway Trail – Columbus & Franklin Co. Metro Parks

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.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federal endangered, and FT = federal threatened.

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 Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

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 ≥ 20 if possible.

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Erin Hazelton 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 the 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 following listed mussel species.

Federally Endangered

purple cat’s paw (*Epioblasma o. obliquata*)
clubshell (*Pleurobema clava*)
northern riffleshell (*Epioblasma torulosa rangiana*)
rayed bean (*Villosa fabalis*)
snuffbox (*Epioblasma triquetra*)

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

elephant-ear (*Elliptio crassidens crassidens*)
Long solid (*Fusconaia maculata maculate*)
Ohio pigtoe (*Pleurobema cordatum*)
pocketbook (*Lampsilis ovata*)
washboard (*Megalonias nervosa*)

State Threatened

black sandshell (*Ligumia recta*)
fawnsfoot (*Truncilla donaciformis*)
pondhorn (*Unio merus tetralasmus*)
threehorn wartyback (*Obliquaria reflexa*)

This project must not have an impact on freshwater native mussels at the project site. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2020), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 5 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. This is further explained within the Ohio Mussel Survey Protocol. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, as a last resort, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. The Ohio Mussel Survey Protocol (2020) can be found at:

<https://ohiodnr.gov/static/documents/wildlife/permits/dow-protocol-ohio-mussel-survey.pdf>

The project is within the range of the following listed fish species.

Federally Endangered

Scioto madtom (*Noturus trautmani*)

State Endangered

goldeye (*Hiodon alosoides*)
Iowa darter (*Etheostoma exile*)
popeye shiner (*Notropis ariommus*)
northern brook lamprey (*Ichthyomyzon fossor*)
spotted darter (*Etheostoma maculatum*)
shortnose gar (*Lepisosteus platostomus*)
tonguetied minnow (*Exoglossum laurae*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)
paddlefish (*Polyodon spathula*)
Tippecanoe darter (*Etheostoma tippecanoe*)

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 American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black-crowned night-heron (*Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their

foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 15 through August 15. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody 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 May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the sandhill crane (*Grus canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction

should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US 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 Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)



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

September 13, 2021

Bradley Rolfes
WSP USA
Suite 2500
312 Vine Street
Cincinnati, OH 45202

Re: 21-0781; Groves Road – Shannon 138 kV Transmission Line Rebuild Project Alternate Route

Project: The proposed project involves the extension of the line from the Groves Road Station south and east to Shannon Station.

Location: The proposed project is located in Madison Township, Franklin 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 data at or within a one mile radius of the project area:

Elktoe (*Alasmidonta marginata*), SC
Wavy-rayed lampmussel (*Lampsilis fasciola*), SC
Tippecanoe darter (*Etheostoma tippecanoe*), T
Three Creeks Metro Park – Columbus & Franklin Co. Metro Parks
Blacklick Creek Greenway Trail – Columbus & Franklin Co. Metro Parks
Big Walnut Greenway – Columbus & Franklin Co. Metro Parks

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.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federal endangered, and FT = federal threatened.

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 Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

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 ≥ 20 if possible.

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Erin Hazelton 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 the 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 following listed mussel species.

Federally Endangered

purple cat's paw (*Epioblasma o. obliquata*)

clubshell (*Pleurobema clava*)

northern riffleshell (*Epioblasma torulosa rangiana*)

rayed bean (*Villosa fabalis*)

snuffbox (*Epioblasma triquetra*)

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

elephant-ear (*Elliptio crassidens crassidens*)
 Long solid (*Fusconaia maculata maculate*)
 Ohio pigtoe (*Pleurobema cordatum*)
 pocketbook (*Lampsilis ovata*)
 washboard (*Megalonaias nervosa*)

State Threatened

black sandshell (*Ligumia recta*)
 fawnsfoot (*Truncilla donaciformis*)
 pondhorn (*Unio merus tetralasmus*)
 threehorn wartyback (*Obliquaria reflexa*)

This project must not have an impact on freshwater native mussels at the project site. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2020), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 5 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. This is further explained within the Ohio Mussel Survey Protocol. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, as a last resort, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. The Ohio Mussel Survey Protocol (2020) can be found at:

<https://ohiodnr.gov/static/documents/wildlife/permits/dow-protocol-ohio-mussel-survey.pdf>

The project is within the range of the following listed fish species.

Federally Endangered

Scioto madtom (*Noturus trautmani*)

State Endangered

goldeye (*Hiodon alosoides*)
 Iowa darter (*Etheostoma exile*)
 popeye shiner (*Notropis ariommus*)
 northern brook lamprey (*Ichthyomyzon fossor*)
 spotted darter (*Etheostoma maculatum*)
 shortnose gar (*Lepisosteus platostomus*)
 tonguetied minnow (*Exoglossum laurae*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)
 paddlefish (*Polyodon spathula*)
 Tippecanoe darter (*Etheostoma tippecanoe*)

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 American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black-crowned night-heron (*Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during

the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 15 through August 15. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody 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 May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the sandhill crane (*Grus canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction

should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US 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 Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

Rolfes, Brad

From: Ohio, FW3 <ohio@fws.gov>
Sent: Friday, August 27, 2021 10:11 AM
To: Rolfes, Brad
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate; Thomayer, Matthew; Grant S Stuller
Subject: AEP - Groves Road – Shannon Transmission Line Preferred Route, Franklin County, Ohio



TAILS# 03E15000-2021-TA-2141

Dear Mr. Rolfes,

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/nleeb/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

Rolfes, Brad

From: Ohio, FW3 <ohio@fws.gov>
Sent: Friday, August 27, 2021 10:07 AM
To: Rolfes, Brad
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate; Thomayer, Matthew; Grant S Stuller
Subject: AEP - Groves Road – Shannon Transmission Line Rebuild Alternate Route, Franklin County, Ohio



TAILS# 03E15000-2021-TA-2140

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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.

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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**

3/7/2022 7:36:09 PM

in

Case No(s). 21-0199-EL-BTX

Summary: Application Application Part 4 electronically filed by Hector Garcia-Santana on behalf of AEP Ohio Transmission Company, Inc.