

Construction Notice Delano Station Expansion Project



An **AEP** Company

BOUNDLESS ENERGYSM

PUCO Case No. 22-0577-EL-BNR

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

Submitted by:
Ohio Power Company

July 27, 2022

Construction Notice for Delano Station Expansion Project

Construction Notice

Ohio Power Company Delano Station Expansion Project

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 Letter of Notification.

The Company proposes to construct the Delano Station Expansion Project (the “Project”) in Green Township, Ross County, Ohio. The purpose of the Project is to provide a 138 kV interconnection to a non-jurisdictional Independent Power Producer’s (IPP) solar facility. The existing Delano Station is 5.8 acres and will be adjusted to expand approximately 0.6 acre to the west. The expansion area is located on property owned by the Company. In addition to the station expansion, a single 138kV transmission line span will be constructed from the substation to the IPP’s point of interconnection, which will be filed with OPSB under separate cover (Case No. 22-0579-EL-BNR). The location of the Project is shown on Figure 1 and Figure 2 in Appendix A.

The Project meets the requirements for a Construction Notice (CN) because it is within the types of projects defined by item 4(a) of Ohio Administrative Code Section 4906-1-01 Appendix A of the Application Requirement Matrix For Electric Power Transmission Lines:

- (4) Constructing additions to existing electric power transmission stations or converting distribution stations to transmission stations where:
 - (a) There is a twenty percent or less expansion of the fenced area.**

The Project has been assigned PUCO Case No. 22-0577-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 the AC1-001 IPP connection facility, AEP Ohio Transmission Company, Inc. will install two new 138 kV breakers at Ohio Power’s existing Delano Station that will include network attachment facilities required to connect to the new generation facility. AEP Ohio Transmission Company will also install a single

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138 kV span out of Delano Station towards the generating facility's station to act as the point of interconnection. The proposed connection is a 49.9 MW (33.93 MW Capacity) solar generating facility in Ross County, Ohio.

In order to connect the IPP to Delano Station, additional work is expected to be required at Ohio Power Company's Delano Station to expand the fence to accommodate the two new 138 kV breakers being installed. A separate application will be filed for this additional work, if applicable.

This project is related to AEP's obligation to connect AC1-001 per the PJM IPP Tariff. The Project was not listed in the Company's 2022 LTFR document, as the Project could not be anticipated at the time of the LTFR filing.

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 transmission line and proposed relocation 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 an expansion of an existing substation on the Company's property. Based on the IPP's proposed development and existing facilities in the area, the proposed location is the most suitable and least impactful for the Project. Other alternatives would require impacting neighboring properties, as opposed to remaining entirely on the Company's property. The proposed Project will result in no impacts to wetlands, streams, or known cultural resource areas eligible for the National Register of Historic Places (NRHP). Therefore, this alternative represents the most suitable location and is the most appropriate solution for meeting the Company and IPP'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 Project will be located entirely within Company owned property, with no additional property owners or tenants affected. 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.

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B(6) Construction Schedule

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

Construction of the Project is planned to begin in October 2022, and the anticipated in-service date will be in February 2023.

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 Kingston, Ohio quadrangle. Figure in Appendix A show the Project Area on recent aerial photography, dated 2019, as provided by the Ohio Statewide Imagery Program (OSIP) at a scale of 1:1,200 scale (1 inch equals 100 feet).

To visit the Project site from Columbus, Ohio, take I-71 South to I-270 East (Exit 101). Continue approximately 1.8 miles to Exit 52 and merge onto U.S. 23 South toward Circleville. Stay on U.S. 23 for approximately 32.8 miles. Take the exit ramp onto OH-207. Turn left onto OH-207 and go 0.2 mile. Turn right onto Hospital Road. After approximately 0.7 mile, turn left onto Delano Road. The Project site is located approximately 0.7 mile on the left (north) side of Delano Road at the approximate address of 1263 Delano Road, Chillicothe, Ohio 45601 at latitude 39.408365, longitude -82.961598.

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 140109059000), which is owned by the Company. No additional ROW will be required. No other property easements, options, or land use agreements are necessary to construct the Project or operate the relocated transmission line.

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

Property Parcel Number	Agreement Type	Easement/ Option Obtained (Yes/No)
140109059000	Company Property	Not Applicable

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B(9) Technical Features

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

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

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

138kV H-Frame transmission line exit structure – (1)
138kV CCVTs, 1-3 phase structure – (3)
138kV Metering CTs (2)
138 kV Metering PTs (2)
Two-column combo structure (2)
138 kV, 88kV MCOV Surge Arresters (3)
138kV GOAB three-phase disconnect switches (5); 1 single column structure per switch
138kV Circuit Breakers – (2)

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 \$5,670,000 using a Class 3 estimate. The costs for this Project will be recovered through total reimbursement by the IPP.

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.

Aerial photography of the Project vicinity is provided as Figure 2 in Appendix A. The Project is located in the Green Township, Ross County, Ohio. Land use in the Project area consists of the existing Delano Station,

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commercial properties, agricultural fields including areas adjacent to the west to be developed with a solar facility, wooded areas, and scattered residences. The closest residence is 1,000 feet to the northwest.

B(10)(b) Agricultural Land Information

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

The proposed Project footprint, adjacent areas, and much of the surrounding vicinity are located on historic agricultural land. Much of this area will be utilized for the IPP solar generation facility. The Ross County Auditor provided a list of parcels registered as Agricultural District Land on June 14, 2022. None of the Project Area properties were identified as an Agricultural District Land parcel.

B(10)(c) Archaeological and Cultural Resources

Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Company's consultant completed a Phase I Cultural Resource Management Investigation of the Project Area. No further investigation was considered to be necessary by the consultant. The Ohio Historic Preservation Office ("SHPO") agreed that the Project will not impact any cultural resources eligible for listing on the NRHP and no additional coordination is necessary prior to construction. A copy of the May 12, 2022 concurrence letter from SHPO is provided in Appendix B.

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

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

If disturbance associated with the Project exceeds state thresholds, then the appropriate Ohio Environmental Protection Agency construction storm water permit will be obtained.

No streams or wetlands are located in the proposed work areas (see Appendix C). 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 **39141Co200D**). Based on this mapping, no mapped FEMA floodplains are located in the Project Area. Therefore, no floodplain permit will be required for this Project.

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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 April 14, 2022 response letter from the USFWS (see Appendix B) indicated 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 is assumed wherever suitable habitat occurs unless a presence/probable absence survey has been performed to document probable absence. The USFWS response letter states that, should the Project site contain trees ≥ 3 inches diameter at breast height (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 in order to avoid adverse effects to these species. If implementation of seasonal tree clearing is not possible, the USFWS recommends summer presence/probable absence surveys be conducted between June 1 and August 15. No potential bat hibernacula or summer roosting habitat for these species was identified within the Project area and the Company intends to conduct any necessary tree clearing between October 1 and March 31. If any tree clearing is required outside of that timeframe, the Company will conduct the required agency coordination and complete presence/probable absence bat mist net surveys for the Indiana bat and northern long-eared bat to ensure no impacts to these species will occur as part of the Project. Additionally, the USFWS states 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. Based on current USFWS Ohio Field Office guidance, no hibernaculum or caves were located in the Project area.

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 on April 11, 2022 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/ONHP and the ODNR – Office of Real Estate was received on May 4, 2022 (see Appendix B).

According to the ODNR-DOW, the Project is within the range of the Indiana bat, northern long-eared bat, little brown bat, and tricolored bat. The ODNR recommends cutting between October 1 and March 31, if necessary. No winter hibernacula were observed within the Project Area and no potential hibernaculum were identified within 0.25 mile of the Project Area based on review of karst and mining GIS data as well as topographic quadrangle maps and aerial photography. No potential summer roost trees were identified within the Project area. The Company intends to conduct any necessary tree clearing between October 1

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and March 31. If any tree clearing is required outside of that timeframe, the Company will conduct the required agency coordination and complete presence/probable absence bat mist net surveys for federally listed and state-listed bat species to ensure no impacts to these species will occur as part of the Project.

The ODNR states that the Project is within the range of 13 state-listed and federally listed threatened and endangered mussel species and 12 state-listed endangered and threatened fish species. Due to the Project location and that there is no in-water work proposed in a perennial stream, ODNR states that this Project is not likely to impact these species.

The Project is also within range of the northern harrier, state-listed endangered bird, and the upland sandpiper, a state-listed threatened bird. Based on the professional ecological review, no suitable nesting habitat is present within the Project area for either of these state-listed bird species. Therefore, this Project is not likely to impact these species and nesting season avoidance dates are not applicable.

Additionally, the Project is within the range of the eastern hellbender, timber rattlesnake, spotted turtle, and the midland mud salamander. ODNR states that due to the location, the type of habitat within the Project area, that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, and the type of work proposed, this Project is not likely to impact these species.

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.

No unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, or other protected natural areas were identified within the Project Area.

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 **39141C0200D**). 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 2022. No wetlands or streams were identified within in the proposed work areas (see Figure 2 in Appendix C).

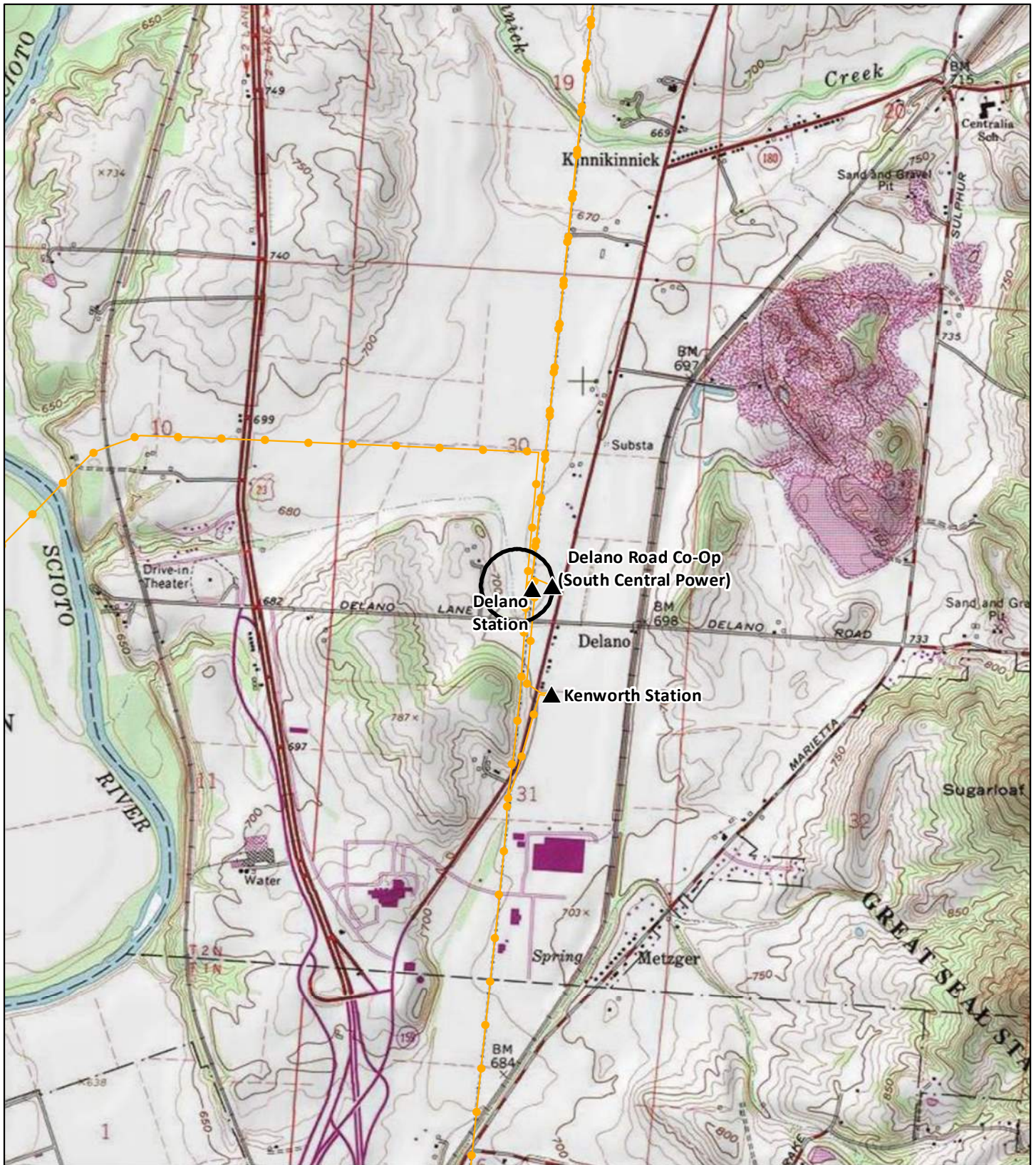
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B(10)(g) Unusual Conditions

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



-  Project
-  Existing Transmission Line (138 kV)
-  Existing Station

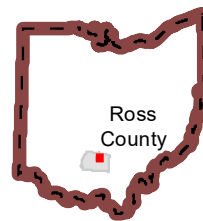
Data Sources: AEP, USGS 7.5'
Topographic Quadrangle
(Kingston, Ohio)

Ohio State Plane South
NAD 1983



June 13, 2022

PROJECT LOCATION

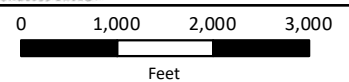


ROSS COUNTY, OHIO

FIGURE 1 TOPOGRAPHIC OVERVIEW



DELANO STATION
EXPANSION





Legend:

- Proposed Delano Station Fence
- Existing Delano Station Fence
- Ohio Power Company Property
- Existing Transmission Line (138 kV)
- Proposed 138 kV Transmission Line
(Filed Separately Under Case No. 22-0579-EL-BNR)

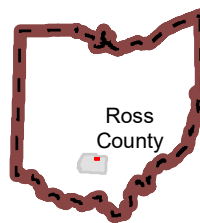
Data Sources: AEP,
OSIP Aerial Photograph (2019)

Ohio State Plane South
NAD 1983



July 19, 2022

PROJECT LOCATION

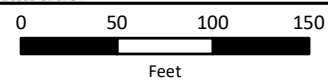


ROSS COUNTY, OHIO

**FIGURE 2
PROJECT AERIAL MAP**



**DELANO STATION
EXPANSION**



Appendix B Agency Coordination



In reply, refer to
2022-ROS-54579

May 12, 2022

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

RE: Delano Station Expansion and Single Structure Tie-in Project, Green Township, Ross County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on April 13, 2022 regarding the proposed Delano Station Expansion and Single Structure Tie-in Project, Green Township, Ross 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 *Phase I Cultural Resource Management Investigations for the .48 ha (1.19 ac) Delano Station Expansion and Single Structure Tie-in Project in Green Township, Ross County, Ohio* by Ryan J. Weller and Scott A. McIntosh (Weller & Associates, Inc. 2022).

A literature review, visual inspection, shovel probe and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological sites are located within the project area and no new archaeological sites were identified during survey. Our office agrees no additional archaeological investigation is needed.

A literature review and field survey were completed as part of the investigations. Four (4) architectural resources over fifty years old were identified within the Area of Potential Effects (APE) during the field survey. Weller recommends that these resources are not eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with Weller's recommendations regarding eligibility.

Based on the information provided, we agree that the project as proposed will have no effect on historic properties. 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. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org, or Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1092915

From: [Ohio, FW3](#)
To: [Godec, Daniel](#)
Cc: nathan.reardon@dnr.state.oh.us; [Parsons, Kate](#)
Subject: Delano Station Expansion Project, Ross County, Ohio
Date: Wednesday, April 13, 2022 9:37:43 AM
Attachments: [image.png](#)
[image.png](#)



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



Project Code: 2022-0030407

Dear Mr. Godec,

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 it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). 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,

A handwritten signature in blue ink, appearing to read "Patrice Ashfield". The signature is fluid and cursive, with the first name "Patrice" written in a larger, more prominent script than the last name "Ashfield".

Patrice Ashfield
Field Office Supervisor

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



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

May 4, 2022

Daniel Godec
Stantec Consulting Services Inc.
11687 Lebanon Road
Cincinnati OH 45241

Re: 22-0379; Delano Station Expansion Project

Project: The proposed project involves expanding the existing Delano substation and installing a new transmission structure north of the station.

Location: The proposed project is located in Green Township, Ross 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

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 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 species of bats 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. If trees are present within the project area, and trees must be cut, the DOW recommends 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. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the “OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING”. If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

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

clubshell (*Pleurobema clava*)
fanshell (*Cyprogenia stegaria*)
northern riffleshell (*Epioblasma torulosa rangiana*)
rayed bean (*Villosa fabalis*)
sheepnose (*Plethobasus cyphus*)
snuffbox (*Epioblasma triquetra*)

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

little spectaclecase (*Villosa lienosa*)
long-solid (*Fusconaia maculata maculata*)
sharp-ridged pocketbook (*Lampsilis ovata*)

State Threatened

black sandshell (*Ligumia recta*)
fawnsfoot (*Truncilla donaciformis*)
threehorn wartyback (*Obliquaria reflexa*)

Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.

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

State Endangered

goldeye (*Hiodon alosoides*)
northern brook lamprey (*Ichthyomyzon fossor*)
northern madtom (*Noturus stigmosus*)
shortnose gar (*Lepisosteus platostomus*)
shovelnose sturgeon (*Scaphirhynchus platyrhynchus*)
spotted darter (*Etheostoma maculatum*)

State Threatened

American eel (*Anguilla rostrata*)
blue sucker (*Cycleptus elongatus*)
channel darter (*Percina copelandi*)
paddlefish (*Polyodon spathula*)
river darter (*Percina shumardi*)
Tippecanoe darter (*Etheostoma Tippecanoe*)

Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species.

The project is within the range of the timber rattlesnake (*Crotalus horridus*), a state endangered species, and a federal species of concern. The timber rattlesnake is a woodland species, utilizing dry slopes and rocky outcrops. In addition to using wooded areas, the timber rattlesnake utilizes sunlit gaps in the canopy for basking and deep rock crevices for overwintering. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the midland mud salamander (*Pseudotriton montanus diastictus*), a state threatened species. Due to the location, the type of habitat within the project area, and the type of work proposed, 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 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.

<https://ohiodnr.gov/static/documents/water/floodplains/Floodplain%20Administrator%20List.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

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

7/27/2022 11:39:22 AM

in

Case No(s). 22-0577-EL-BNR

Summary: Notice Construction Notice Delano Station Expansion Project. Part 1 of
3 electronically filed by Hector Garcia-Santana on behalf of Ohio Power Company