

Construction Notice Spickard-Dodson Creek Solar 138 kV Generation Tie Project



An **AEP** Company

PUCO Case No. 23-0584-EL-BNR

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

Submitted by:
Ohio Power Company

August 4, 2023

Construction Notice for Spickard-Dodson Creek Solar 138 kV Generation Tie Project

Letter of Notification

Ohio Power Company Spickard-Dodson Creek Solar 138 kV Generation Tie 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 Spickard-Dodson Creek Solar 138 kV Generation Tie Project (the “Project”) in Dodson Township, Highland County Ohio. The purpose of the Project is to provide a 138 kV interconnection to the Dodson Creek Solar facility (OPSB Case Number 20-1814-EL-BGN), proposed by Dodson Creek Solar, L.L.C., an Independent Power Producer (IPP). The 138 kV generation tie line will be less than 0.1 mile and connect AEP Ohio Transmission Company’s Spickard Station (Case No. 23-0583-EL-BLN) to the IPP station. The generation tie line will span across property anticipated to be transferred to AEP Ohio Transmission Company, an affiliate of the Company, as part of the station and transmission line cut-in portion of the Project. 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 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. 23-0584-EL-BNR.

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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 a part of the AC2-061 IPP Interconnection Service Agreement, AEP Ohio Transmission Company, an affiliate of the Company, will be required to cut-in to one of the two circuits of the Hillsboro-Clinton 138 kV line by installing two conductor spans to cut into proposed Spickard Station. The proposed connection is a 111 MW Maximum Facility Output (MFO) (58.1 MW Capacity) solar generating facility in Highland County, Ohio. The Company will also be required to construct a 138 kV generation tie line from the proposed Spickard Station to the point of interconnection.

The Project is assigned to the PJM Network upgrade number n6634. Failure to move forward with the proposed Project will result in the Company's inability to serve the customer's generation interconnection request, thereby jeopardizing the customer's required in-service date per the FERC approved Interconnection Service Agreement. The Board has approved the generating facility (Case # 20-1814-EL-BGN). The Project was not included in the Company's 2023 Long Term Forecast Report (LTFR) because the solution was not known at the time of 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 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 land currently owned by a third party but under option to purchase by the IPP. The Spickard Station, cut-in, and the majority of the generation tie line is anticipated to be located on property transferred to the Company and within the overall development of the solar generation facility. The remaining portion of the generation tie line will extend into the IPP's station on the IPP's property. Transfer of the property to Company ownership is expected to occur prior to the construction. No impacts to streams or cultural resources or tree clearing are anticipated. No residences are located within 1,000 feet. 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, and would add additional transmission length to the associated projects without any additional benefit. Therefore, the Project

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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 property under option for purchase by a specific customer with the Project portions transferred to the Company. 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.

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 November 2023, and the anticipated in-service date will be May 2024.

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 Lynchburg, Ohio quadrangle. Figure 2 in Appendix A shows the Project area on recent aerial photography, dated 2020, as provided by ESRI's World Imagery at a scale of 1:6,000 scale (1 inch equals 500 feet).

To visit the Project site from Columbus, Ohio, take I-71 South approximately 48 miles to Exit 58 for OH-72 toward Sabina/Jamestown. Turn left onto OH-72. After approximately 10.1 miles, turn right on OH-729 South and continue for 7.6 miles. Turn left onto OH-73 East. Continue for 8.1 miles before turning right onto Welcome Road for 1.7 miles. Cross County Road 124 and the road name changes to Anderson Road. Continue for 3.7 miles before turning left onto Spickard Road. After 1.7 miles, turn right onto U.S. 50. The Project is located approximately 0.7 miles west of Spickard Road on the right and approximately 0.2 miles north of U.S. 50 at latitude 39.208120 longitude -83.755294.

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B(8) Property Agreements

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

All work activities are proposed on Parcel 09-09-000-019.00, which is currently owned by a private landowner. The IPP currently holds an option to purchase a portion of the property on which the Project will be situated. This portion of the property needed for the station, cut-in, and a portion of the generation tie line is anticipated to be transferred to the Company or IPP prior to the construction. The remaining portion of the generation tie line will span into the IPP station, which will be owned by the IPP.

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 anticipated to be installed for the Project include the following:

Cut-in

Line Asset Name:	Spickard-Dodson Creek Solar 138 kV Generation Tie Line
Ownership:	Ohio Power Company
Voltage:	138 kV
Conductors:	(3) 1033.5 KCM ACSR 54/7 (Curlew)
Static Wire:	(2) 7#8 Alumoweld
Insulators:	Polymer
ROW Width:	Not Applicable
Structure Type:	(1) Single Circuit, Monopole Deadend, custom concrete pier foundation

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.

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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 \$230,000 using a Class 4 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 Dodson Township, Highland County, Ohio. Land use in the Project area consists of agricultural fields. 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.

The Project, adjacent areas, and much of the surrounding vicinity are located on former agricultural land. Much of this area will be used for the approved IPP solar generation facility. On July 7, 2023, the Highland County Auditor indicated that the Project parcel is not registered as Agricultural District Land.

B(10)(c) Archaeological and Cultural Resources

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

The IPP completed a Phase I Archaeological and Historic Architecture surveys for their overall solar generation facility, which included the Project location. The investigation identified some cultural resources, but no archaeological sites are within the work areas of the Project and no architectural resources are in the immediate vicinity. The IPP and the Ohio Historic Preservation Office ("SHPO") agreed to a Memorandum of Understanding (MOU) for the overall solar generation facility including the Project location. A copy of the October 19, 2021, MOU is provided in Appendix B.

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

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

A Notice of Intent will be filed with the Ohio Environmental Protection Agency for authorization of construction stormwater discharges under General Permit OHC0000006. 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.

The IPP conducted an ecological survey of over 1,400 acres for their solar facility, which included the Project location. The Company’s consultant prepared a summary report specific to the Project area (see Appendix C). One perennial stream and one palustrine emergent (PEM) wetland were delineated near the Project. Figures showing the delineation results from the IPP’s survey are included in Appendix C. No streams or wetlands are impacted by the Project.

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 39015C0100D). 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 the 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 IPP’s solar generation facility, 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 5, 2021, response letter from the USFWS (see Appendix B) indicated that the federally endangered Indiana bat and federally threatened northern long-eared bat occur throughout Ohio. USFWS noted that confirmed records of the Indiana bat are within the vicinity of the overall solar generation facility. Therefore, additional summer surveys should not constitute presence/absence for this species. USFWS recommended seasonal tree clearing, if necessary, between October 1 and March 31. No tree clearing is anticipated as part of the Project. Due to the Project

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type, size, and location, USFWS does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.

A coordination letter was submitted by the IPP's consultant 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 March 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 March 19, 2021 (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 tree clearing is anticipated for the Project. A review of potential winter bat hibernacula including underground mine openings and karst features was conducted within 0.25 miles of the Project. No potential hibernacula were identified. Therefore, no additional coordination with ODNR is required.

ODNR indicated that no impacts to freshwater mussels are anticipated, which applies to both listed and non-listed species. ODNR also indicated that the Project is within the range of the bigeye shiner, listed as a state threatened fish. The proposed design avoids impacts to perennial streams. Therefore, no impacts to mussel or fish species are anticipated.

The ODNR-DOW indicated that the Project is within the range of the king rail and loggerhead shrike, state-endangered birds. The habitat for the aforementioned species was not identified within the Project area based on the IPP's ecological survey; therefore, the 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.

Based on a correspondence with ODNR, review of desktop GIS data, and site reconnaissance, 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 39015C0100D). Based on these maps, no mapped FEMA floodplains are located in the Project area.

The IPP conducted an ecological survey of over 1,400 acres for their solar facility, which included the Project area. The Company's consultant prepared a summary report specific to the Project area (see Appendix C).

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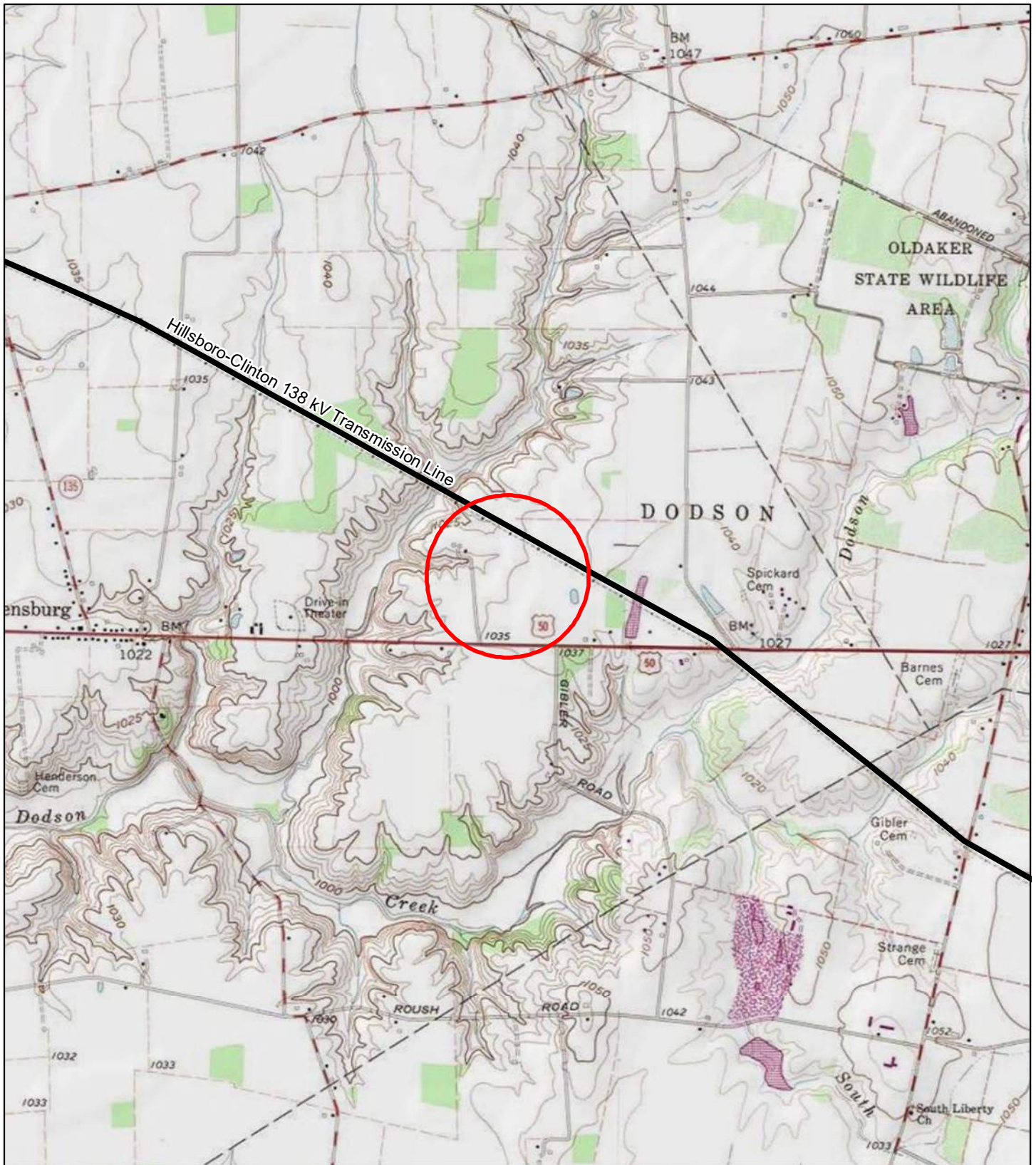
One perennial stream and one PEM wetland were delineated near the Project. Figure 4B showing the delineation results from the IPP's survey is included in Appendix B. No streams or wetlands are impacted by the Project.

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:

- Project Area
- Existing Transmission Line

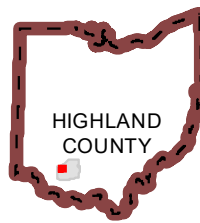
Data Sources: AEP, USGS 7.5' Topographic Quadrangle (Lynchburg, Ohio)

Ohio State Plane South NAD 1983



July 20, 2023

PROJECT LOCATION



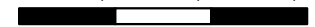
HIGHLAND COUNTY, OHIO

**FIGURE 1
TOPOGRAPHIC OVERVIEW**

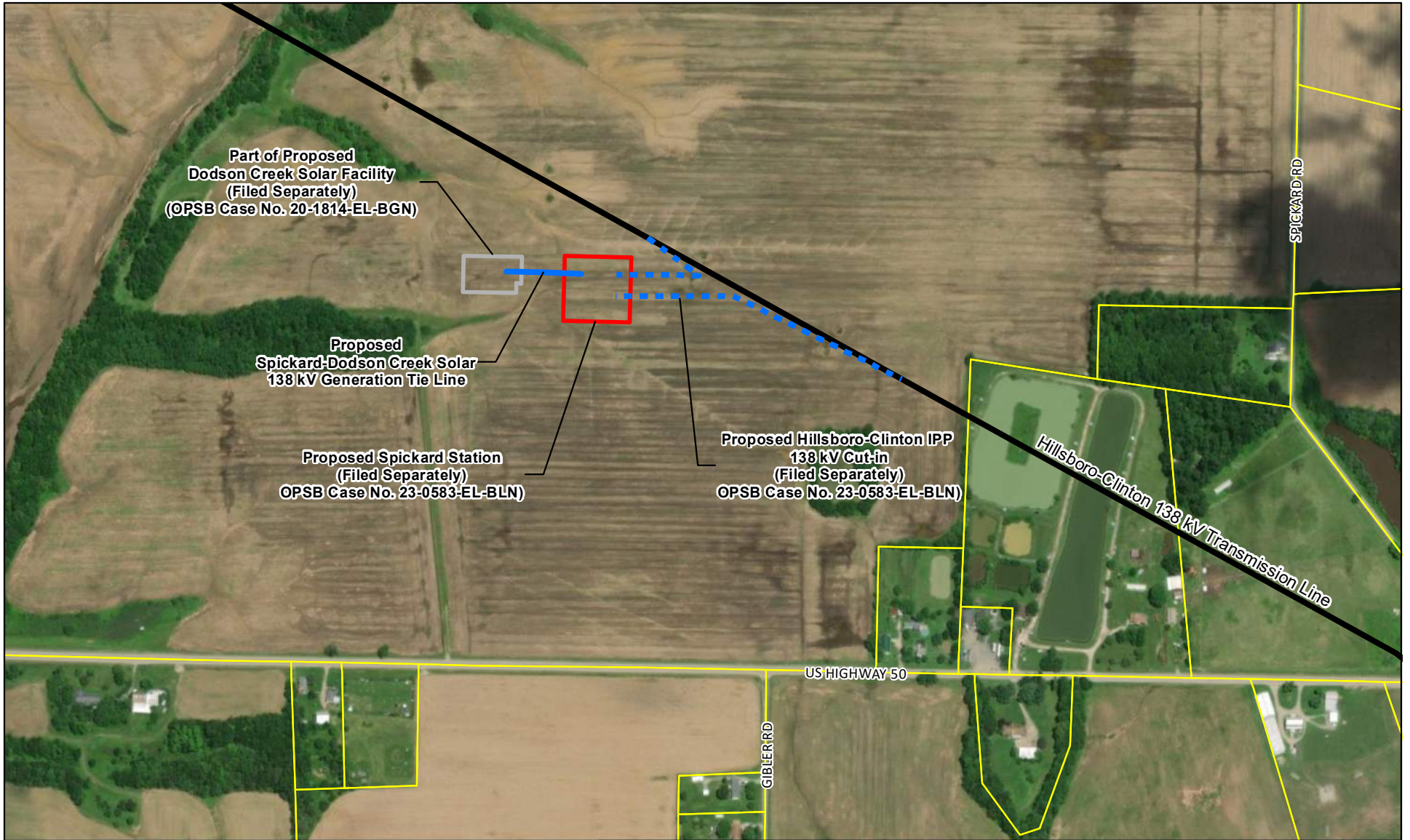


Spickard-Dodson Creek Solar
138 kV Generation Tie Line Project

0 1,000 2,000 3,000



Feet




Legend

- Proposed 138 kV Generation Tie Line
- Proposed Spickard Station Fence (Filed Separately)
- - - Proposed 138 kV Transmission Line Cut-in (Filed Separately)
- Proposed IPP Station
- Existing Transmission Line
- Parcel Boundary

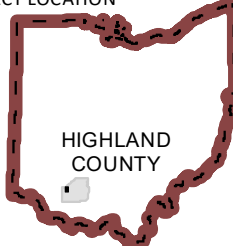
Data Sources: AEP,
ESRI World Imagery, 2021

Ohio State Plane South
NAD 1983



July 20, 2023


PROJECT LOCATION



HIGHLAND COUNTY

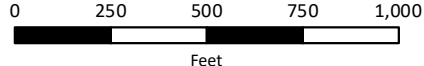
HIGHLAND COUNTY, OHIO

**FIGURE 2
PROJECT AERIAL MAP**



an AEP Company

Spickard-Dodson Creek Solar
138 kV Generation Tie Line Project



0 250 500 750 1,000
Feet

Appendix B Agency Coordination

**MEMORANDUM OF UNDERSTANDING
BETWEEN THE OHIO STATE HISTORIC PRESERVATION
OFFICE AND DODSON CREEK SOLAR, LLC REGARDING THE
DODSON CREEK SOLAR ENERGY PROJECT IN
HIGHLAND COUNTY, OHIO**

WHEREAS, on May 27, 2021 Dodson Creek Solar Project, LLC (“Dodson Creek Solar”) submitted an application for a Certificate of Environmental Compatibility and Public Need in Case No. 20-1814-EL-BGN (“Certificate”) to the Ohio Power Siting Board (“OPSB”), and intends to operate the Dodson Creek Solar Energy Project (“Project”), an up to 117 MW solar-powered electric generating facility to be located in Dodson and Hamer Townships in Highland County, Ohio.

WHEREAS, a Phase I Archaeological Reconnaissance Survey and Report and a Phase 1 History Architecture Reconnaissance Survey and Report were completed (collectively, the “Reports”);

WHEREAS, Dodson Creek Solar and the Ohio State Historic Preservation Office (“SHPO”) established an Area of Potential Effects (“APE”) for the Survey to include the area of potential ground disturbance and any property that may be physically altered or destroyed by the Project, as well as a visual radius around the Project for visual impacts; and

WHEREAS the Reports identified cultural resources of archaeological or architectural significance;

WHEREAS, the archaeological site 33HI579 was identified within the boundaries of the Project and determined through SHPO consultation to be potentially eligible for the National Register of Historic Places (“NRHP”);

WHEREAS, ten architectural resources were identified within the visual APE of the Project through the Survey (Ohio Historic Inventory Ref. Nos. HIG0049107 (FS 24), HIG0048903 (FS 60), HIG0049007 (FS 68), HIG0048209 (FS 82), HIG0048309 (FS 84), HIG0048609 (FS 86), HIG0049209 (FS 90), HIG0049409 (FS 103), HIG0049508 (FS 109) and HIG0049607 (FS 110), which have been determined as potentially eligible for listing in the NRHP;

WHEREAS, two of the ten resources were preliminarily identified in the Phase 1 History Architecture Reconnaissance Survey and Report as having potential indirect adverse effects due to visual impacts from the Project (Ohio Historic Inventory Ref. No. HIG0049007 (FS 68) and HIG0049409 (FS 103));

WHEREAS, adverse impacts from the Project are not anticipated to resources HIG0049007 (FS 68) and HIG0049409 (FS 103) due to their distance from the Project, existing vegetation in the direct vicinity of these resources that assist with screening, existing vegetation at greater distances from the resources that help to obscure portions of the Project’s aboveground infrastructure from view, and the continued traditional agricultural use of the surrounding landscape;

WHEREAS, Dodson Creek Solar utilized its currently proposed Landscape Mitigation Plan as that addresses potential visual impacts to resources HIG0049007 (FS 68) and HIG0049409 (FS 103) from the Project and propose strategies to mitigate adverse impacts, a copy of which is attached as **Exhibit A**;

WHEREAS, Effects and Mitigation Measures for the foregoing resources have been identified as **Exhibit A**.

NOW, THEREFORE, the SHPO and Dodson Creek Solar agree in this Memorandum of Understanding (“MOU”) as follows:

I. RECITALS

The recitals set forth above are incorporated into and are made a part of this MOU.

II. STIPULATIONS

A. The SHPO and Dodson Creek Solar agree that if the Project is constructed, the Project shall be implemented in accordance with the following stipulations to account for the effect of the Project on historic resources.

1. Dodson Creek Solar will avoid ground disturbance in the designated avoidance area for archaeological site 33HI579 (**Exhibit B**). Construction fencing will be placed within the 50-foot buffer of these resources, near the buffer edge, prior to construction to physically demarcate the area from construction personnel, indicating avoidance. This fencing will be maintained in good condition throughout the duration of construction. Dodson Creek Solar may revise the components of Exhibit B upon development of the Project’s final facility layout without affecting the protection measures of these resources.

B. The SHPO agrees that the provisions of **Exhibit A** specific to the foregoing identified resources adequately address the impacts to the resources identified in the recitals to this MOU.

1. Dodson Creek Solar may revise the Landscape Mitigation Plan upon development of the Project’s final facility layout subject to the following conditions:

a. Dodson Creek Solar shall maintain agreed upon vegetative screening for two architectural resources (Ohio Historic Inventory Ref. Nos. HIG0049007 (FS 68) and HIG0049409 (FS 103)) for the life of the facility as defined in this agreement document, and shall replace any failed plantings so that, after five years, at least 90 percent of the vegetation has survived. Dodson Creek Solar shall maintain all perimeter project fencing in proximity to that resource for the term of the Project and shall promptly repair any damage as needed. Lighting will be down lit, and switch and motion activated to the extent practicable.

b. Changes to the Landscape Mitigation Plan that do not impact views to the resources identified in paragraph (a) above are not subject to SHPO review.

c. Any reduction in screening between aboveground project components and the resources identified in paragraph (a) above shall not occur unless an amendment to this MOU is executed pursuant to Section IV of this MOU.

III. POST-REVIEW DISCOVERIES

1. In the event that Dodson Creek Solar discovers a previously unidentified site within the APE that may be eligible for listing in the NRHP that would be affected by the Project, Dodson Creek Solar shall promptly stop work in the immediate area of the unidentified site and notify the SHPO within 48 hours of the discovery. If Dodson Creek Solar and SHPO concur that the discovered resource is eligible for listing in the NRHP, Dodson Creek Solar will consult with the SHPO to evaluate measures that will avoid, minimize, and/or mitigate adverse effects. Upon agreement between Dodson Creek Solar and SHPO regarding such measures, Dodson Creek Solar shall implement the measures and notify the OPSB through its Staff of the implementation of the measures.
2. If Dodson Creek Solar discovers any human or burial remains during implementation of the Project, Dodson Creek Solar shall cease work immediately in the surrounding area, notify the SHPO and the OPSB's Staff and adhere to applicable state and federal laws regarding the treatment of human or burial remains.

IV. AMENDMENTS

This MOU may be amended upon the written agreement of the SHPO and Dodson Creek Solar. The amendment will be effective on the date a copy is signed by all parties unless otherwise stated and agreed to in the amendment.

V. TERMINATION

If Dodson Creek Solar determines that the terms of this MOU will not or cannot be carried out, they shall immediately consult with the SHPO to attempt to develop an amendment per Section IV of this MOU. If terms of an amendment cannot be reached within thirty days, the MOU may be terminated upon written notification to the SHPO.

Should the OPSB deny Dodson Creek Solar's application for a Certificate and such order of the OPSB becomes final and non-appealable, then either party may terminate this MOU at its discretion by providing written notice to the other party.

VI. DURATION

This MOU is effective upon its execution by both the SHPO and Dodson Creek Solar and shall remain in effect leading up to and upon receipt of a Certificate issued by the OPSB to Dodson Creek Solar or any subsequent transferee. Thereafter, this MOU shall remain in effect until expiration of the Certificate.

VII. EXECUTION IN COUNTERPARTS

This MOU may be executed in counterparts, with a separate page for each signatory, each of which shall constitute an original, and all of which shall constitute one and the same agreement.

**Ohio History Connection
State Historic Preservation Office**

Diana Welling

Digitally signed by Diana Welling
DN: cn=Diana Welling, o=Ohio History Connection,
ou=State Historic Preservation Office,
email=dwelling@ohiohistory.org, c=US
Date: 2021.10.19 19:32:40 -0400

10/19/2021

Diana Welling, Department Head &
Deputy State Historic
Preservation Officer for
Resource Protection &
Review

Date

Contact:

800 East 17th Avenue Columbus, OH 43215
614-298-2000
dwelling@ohiohistory.org

Dodson Creek Solar, LLC

M. Schmit

10/19/2021

Melissa Schmit, Director, Permitting
Authorized Signatory Dodson Creek Solar, LLC

Date

Contact:

8400 Normandale Lake Blvd Suite 1200,
Bloomington, MN 55437

melissa@nationalgridrenewables.com

From: Ohio, FW3 <ohio@fws.gov>

Sent: Monday, April 5, 2021 10:05 AM

To: Lindsey Hesch <lhesch@nationalgridrenewables.com>

Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate <kate.parsons@dnr.state.oh.us>

Subject: Dodson Creek Solar, LLC Solar Energy Project, Highland County, Ohio - Additional Consultation Requested



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# 03E15000-2020-TA-2450

Dear Ms. Hesch,

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: The proposed project is in the vicinity of one or more confirmed records of Indiana bats. 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 known or assumed present. *Please note that, because Indiana bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.*

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,

A handwritten signature in black ink, reading "Patrice Ashfield". The signature is written in a cursive style with a large, sweeping initial "P" and a long, vertical tail on the "f".

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

March 19, 2021

Justin Pitts
TRC
781 Science Boulevard, Suite 200
Gahanna, Ohio 43230

Re: 21-0022; Dodson Creek Solar, LLC - TRC Project 416571

Project: The proposed project involves the construction of a 117-megawatt solar energy facility.

Location: The proposed project is located in Dodson, Union, and Hamer Townships, Highland 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 no records at or within a one-mile radius of the project area.

Oldaker Wildlife Area – Division of Wildlife

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 Division of Wildlife is working closely with our partners at Ohio Pollinator Habitat Initiative (OPHI) to create and enhance pollinator habitat at solar power installations. Attached for your use is the Ohio Solar Site Pollinator Habitat Planning and Assessment Form. This form was developed by the OPHI Solar Pollinator Program Advisory Team. We recommend that the areas between and around the solar panels be planted with legumes and wildflowers (i.e. forbs) that are beneficial to pollinators and other wildlife and reduce use of non-native grass and gravel. The recommended legumes and forbs listed below are low-growing so as not to cast shadows on the solar panels and would only require one to two mowings a year for maintenance, which should minimize maintenance costs. For other areas of the installation where vegetation does not have to be low-growing, alternative pollinator mixes are available with a more diverse array of flowering plants. This perennial vegetation will provide beneficial foraging habitat to songbirds and pollinators while reducing storm water runoff, standing water, and erosion. Please contact the Ohio Pollinator Habitat Initiative <http://www.ophi.info/>, and specifically Mike Retterer mretterer@pheasantsforever.org for further information on solar power facility pollinator plantings.

Recommended low-growing grasses and forbs may include:

Little Bluestem	<i>Schizachyrium scoparium</i>
Sideoats Grama	<i>Bouteloua curtipendula</i>
Alfalfa	<i>Medicago spp.</i>
Alsike Clover	<i>Trifolium hybridum</i>
Brown-eyed Susan	<i>Rudbeckia triloba</i>
Butterfly Milkweed	<i>Asclepias tuberosa</i>
Lanceleaf Coreopsis	<i>Coreopsis lanceolata</i>
Partridge Pea	<i>Chamaecrista fasciculata</i>
Timothy	<i>Phleum pratense</i>
Orchardgrass	<i>Dactylis glomerata</i>
Crimson Clover	<i>Trifolium incarnatum</i>
Ladino or White Clover	<i>Trifolium repens</i>

The project is within the vicinity of records for the Indiana bat (*Myotis sodalis*), a state endangered and federally 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.”

<https://ohiodnr.gov/static/documents/wildlife/wildlife-management/Bat+Survey+Guidelines.pdf>

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.

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:

<http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/licenses%20&%20permits/OH%20Mussel%20Survey%20Protocol.pdf>

The project is within the range of the bigeye shiner (*Notropis boops*), a state threatened fish. The DOW recommends no in-water work in perennial streams from April 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact this or other aquatic species.

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat during the species’ nesting period of May 1 to August 1. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the loggerhead shrike (*Lanius ludovicianus*), a state endangered bird. The loggerhead shrike nests in hedgerows, thickets and fencerows. They hunt over hayfields, pastures, and other grasslands. If thickets or other types of dense shrubbery habitat will be impacted, construction should be avoided in this habitat during the species’ nesting period of

April 1 to August 1. If this 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 U.S. Fish & Wildlife Service.

Geological Survey: The Division of Geological Survey has the following comment.

Physiographic Region

The proposed project area is in Dodson, Hamer, and Union Townships in Highland County. This area is in the Illinoian Till Plain physiographic region. This region is characterized by rolling ground moraine composed of Illinoian till. This area typically lacks ice-constructional features such as moraines, kames, and eskers. Many buried valleys are associated with this area. Modern valleys alternate between broad floodplains and bedrock gorges. A silt-loam, high-lime Illinoian-age till covers Ordovician and Silurian-age bedrock. This till is frequently capped by loess (Ohio Department of Natural Resources, Division of Geological Survey, 1998).

Surficial/Glacial Geology

The project area lies within the glaciated margin of the state and includes several Illinoian-age glacial features. The project area is covered by the relatively flat, gently undulating, continuous till of the Illinoian ground moraine (Pavey et al, 1999). Glacial drift throughout most of the study area is up to 62 feet thick. Drift is thinnest in the eastern portion of the study area and thickest in the western portion of the study area (Powers and Swinford, 2004).

Bedrock Geology

The uppermost bedrock unit in the project area is the Estill Shale. This unit is Silurian-age and consists of reddish gray to greenish gray shale with sparse argillaceous dolomite beds. Underlying the Estill Shale is the Silurian-age Dayton Limestone, Noland Formation and Brassfield Undivided. This unit is characterized by limestone dolomite, chert, and shale. The Dayton Formation is fine to medium grained beds of limestone. The Brassfield Formation is thin to thick beds of sparse dolomite, chert and shale. Underlying the Brassfield Formation is the Ordovician-age Drakes Formation and Waynesville Formation Undivided. This unit is characterized by gray to bluish gray interbedded limestone and dolomitic shale. The Dayton Limestone, Noland Formation and Brassfield Undivided and Drakes Formation and Waynesville Formation Undivided make up an equal portion of the study area and combined account for 98% of the bedrock beneath the study area. It should be noted that bedrock is not exposed at the surface within the boundaries of the project area due to significant glacial drift (Slucher et al, 2006).

Oil, Gas and Mining

ODNR has record of one oil and gas well within one mile of the proposed project area. This well is a historical oil and gas well. The well is listed as restored (Ohio Department of Natural Resources, Division of Oil and Gas, *Ohio Oil and Gas Wells Locator*).

ODNR does not have record of any mining operations within the project area. The eastern edge of the project area is adjacent to the site of a former and now released limestone quarry previously operated by Hanson Aggregates/Davon (Ohio Department of Natural Resources, Division of Mineral Resources, *Mines of Ohio*).

Seismic Activity

Several small earthquakes have historically been recorded near the site. The three events closest to the site are listed in the chart below (Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Earthquake Epicenters*):

Date	Magnitude	Distance to Site Boundary	County	Township
August 30, 1881	2.9	1.3 miles	Highland	New Market
January 11, 1854	3.5	12.4 miles	Clinton	Green
February 19, 1995	3.6	14.1 miles	Highland	Marshall

Karst

Karst features usually form in areas that are covered by thin or no glacial drift and the bedrock is limestone or dolomite. There are no sinkholes within the bounds of the project area. However, the underlying Dayton Limestone, Noland Formation, Brassfield Undivided, Drakes, Waynesville, and Arnheim formations are composed of carbonate bedrock which can be prone to the development of karst features. The nearest verified sink hole to the project area is 1.7 miles to the east (Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Karst*).

Soils

According to the USDA Web Soil Survey, the project area consists primarily of soils derived from glacial till and loess. Westboro, Clermont, Rossmoyne, and Jonesboro are the most common soil series found within the boundaries of the project area. Together these soils cover over 88% of the project area and have a clay loam soil texture (USDA Web Soil Survey).

There is a low risk of shrink-swell potential in these soils. Slope is variable and can exceed an 18% grade on the slopes along stream valleys (Williams et al, 1977 and USDA Web Soil Survey).

Groundwater

Groundwater resources are limited throughout the project area. Wells developed in bedrock are likely to yield up to five gallons per minute. Bedrock groundwater yields are limited throughout the study area (Schmidt, 1991 and Ohio Department of Natural Resources, Division of Water, *Bedrock Aquifer Map*, 2000). Wells developed in glacial material are likely to yield up to 25 gallons per minute. The lowest unconsolidated aquifer yields are on the till plain that makes up the uplands in the project area. Higher yields are found adjacent to streams and in stream valleys. Higher groundwater yields typically reflect larger diameter, properly developed and screened wells (Ohio Department of Natural Resources, Division of Water, *Statewide Unconsolidated Aquifer Map*, 2000).

ODNR has record of 27 water wells drilled within one mile of the project area. These wells range in depth from 36 to 328 feet deep, with an average depth of 108 feet. The most common aquifer listed is limestone. Seventeen of the water wells are completed in limestone bedrock. Five wells are completed in shale bedrock. The remaining wells are completed in sand and gravel or clay and rock. One well record within one mile of the project area contains sustainable yield data. This well is developed in a sand and gravel aquifer and records a sustainable yield of 30 gallons per minute (Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Water Wells*). The ground-water resources map for Highland County reports yields less than three gallons per minute may be developed in the interbedded shale and limestone found within the project area (Schmidt 1991).

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 (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

References:

References

- Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Earthquake Epicenters*, online interactive map, <https://gis.ohiodnr.gov/MapView/?config=earthquakes>
- Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Karst*, online interactive map, https://gis.ohiodnr.gov/website/dgs/karst_interactivemap/
- Ohio Department of Natural Resources, Division of Geological Survey, (1998). *Physiographic Regions of Ohio*. Ohio Department of Natural Resources, Ohio Department of Natural Resources, Division of Geological Survey, map with text, 2 p., scale 1:2,100,000.
- Ohio Department of Natural Resources, Division of Geological Survey, (In progress). *Statewide Surficial Geology Map*. GIS coverage.
- Ohio Department of Natural Resources, Division of Mineral Resources, *Mines of Ohio*, online interactive map, <https://gis.ohiodnr.gov/MapView/?config=OhioMines>.
- Ohio Department of Natural Resources, Division of Oil and Gas, *Ohio Oil and Gas Wells Locator*, online interactive map, <https://gis.ohiodnr.gov/MapView/?config=oilgaswells>.
- Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Water Wells*, online interactive map, <https://gis.ohiodnr.gov/MapView/?config=waterwells>.
- Ohio Department of Natural Resources, Division of Water, (2000). *Statewide Bedrock Aquifer Map*, GIS coverage.
- Ohio Department of Natural Resources, Division of Water, (2000). *Statewide Unconsolidated Aquifer Map*, GIS coverage.
- Pavey, R., Goldthwait, R., Brockman, C.S. Hull, D., Swinford, E.M., and Van Horn, R. (1999). *Quaternary Geology of Ohio*, Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:500,000.
- Powers, D.M., and Swinford, E.M. (2004). *Shaded drift-thickness map of Ohio*, Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:500,000
- Rosengreen, T.E., (1974) *Glacial Geology of Highland County, Ohio*, Ohio Department of Natural Resources, Division of Geological Survey, Report of Investigations No. 92, map with text, 33 p., scale 1:62,500.
- Schmidt, J. J. (1991). *Groundwater Resources of Highland County*, Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:62,500.
- Slucher, E., Swinford, E., Larsen, G., Schumacher, G., Shrake, D., Rice, C., Caudill, M., Rea, R. and Powers, D. (2006). *Bedrock Geologic Map of Ohio*, Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:500,000.
- USDA Web Soil Survey, (Last modified 2019). *Web Soil Survey Interactive Map*, United States Department of Agriculture, National Resources Conservation Service, online interactive map, <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.
- Williams, N. L., Kerr, J. W., and McLoada, N. A.,(1977) *Soil Survey of Highland County, Ohio*. United States Department of Agriculture, Natural Resources Conservation Science. Retrieved from nrcs.usda.gov

Appendix C Environmental Summary



ENVIRONMENTAL SOLUTIONS & INNOVATIONS, INC.

1158 Dutilh Road
Mars, PA 16046-9448
Phone: 513-451-1777 Fax: 513-451-3321

Pesi2056

11 July 2023

Ohio Power Siting Board (OPSB)
180 E Broad Street
Columbus, Ohio 43215

Dear OPSB:

**RE: AMERICAN ELECTRIC POWER (AEP) OHIO
DODSON CREEK SPICKARD STATION
SUMMARY OF ECOLOGICAL, ENVIRONMENTAL, AND CULTURAL
FINDINGS**

This letter provides a summary of the ecological, environmental, and cultural investigations performed previously by others for the area of the proposed American Electric Power (AEP) Ohio Dodson Creek Spickard Station. Environmental Solutions & Innovations, Inc. (ESI) did not perform any desktop or field evaluations for the site and assumes no liability over the data, descriptions or conclusions presented in the attached reports. This letter summarizes the following evaluations that were provided to ESI by Aldridge Electric, Inc. (Aldridge) for review:

- Phase I Archaeological Reconnaissance, Dodson Creek Solar Project, Dodson, Hamer, and Union Townships, Highland County, Ohio performed by Cardno, Inc. (Cardno) and dated 2 July 2021;
- Historic Architectural Reconnaissance, Dodson Creek Solar Project, Union, Dodson, and Hamer Townships, Highland County, Ohio performed by Cardo and dated 24 May 2021;
- Jurisdictional Waters Delineation Report, Dodson Creek Solar, LLC, Highland County, Ohio performed by TRC Environmental Corporation (TRC) dated April 2021; and
- Phase I Environmental Site Assessment, Dodson Creek Solar, LLC, Highland County, Ohio performed by TRC dated 23 April 2021.

www.ENVSI.com

Each of the above evaluations were performed for the proposed 1,462-acre Dodson Creek Solar Project. The proposed Dodson Creek Spickard Station will occupy less than four acres in the north-central portion of the overall solar development. The following summaries are focused only on the area of the proposed Station.

The Phase I Archaeological Reconnaissance performed by Cardo conducted systematic shovel probe excavations (STPs) in approximate 15-m (49.2-ft) intervals across the proposed Station site. The shovel tests were 50 centimeters (19.6-inches) in diameter into undisturbed soils. Soils were screened for cultural materials through a 0.25-inch hardware mesh. All the STPs performed at the proposed Station site were negative. No cultural materials were found there, and Cardo did not recommend further archaeological work at the Station site.

The Historic Architectural Reconnaissance performed by Cardno identified two properties that may have adverse effects from the proposed solar project. The closest of the two properties is over a mile from the proposed Station site. Further, Cardno stated that the solar project will implement mitigation measures after consultation with the Ohio Historic Preservation Office (OHPO).

The Jurisdictional Waters Delineation Report performed by TRC found a perennial stream (S-TPT-25) and a palustrine emergent (PEM) wetland (W-SJB-3) near the Station site. The proposed station design avoids impacts to the perennial stream. The total permanent impact to the PEM wetland is currently below 0.1 acres and will be documented in a non-reporting Pre-Construction Notice under the U.S. Army Corps of Engineers (USACE) Nationwide Permit 57 (NWP-57).

The Phase I Environmental Site Assessment performed by TRC identified no Recognized Environmental Conditions (RECs), controlled RECs (CRECs), or historical RECs (HRECs) for the proposed station site. TRC found a Business Environmental Risk (BEC) associated with possible past use of herbicides and pesticides for agricultural purposes. However, TRC presumed that these substances were historically applied at “application” concentrations (if any) and concluded that the site did not appear to have been impacted by releases of herbicides and pesticides.

The attached investigations performed by Cardno and TRC evaluated potential cultural, architectural, ecological, and environmental issues for the proposed Dodson Creek Solar Project, which included the proposed footprint of the Dodson Creek Spickard Station. This letter summarizes their findings specifically for the Station site. Of the four evaluations, the major discovery was the presence of a perennial stream and PEM wetland near the proposed Station. Impacts to the aquatic resources will be permitted as required by the State of Ohio and USACE.

Should you have any questions on any of the above summaries, please do not hesitate to contact me at any of the below options.

Sincerely,



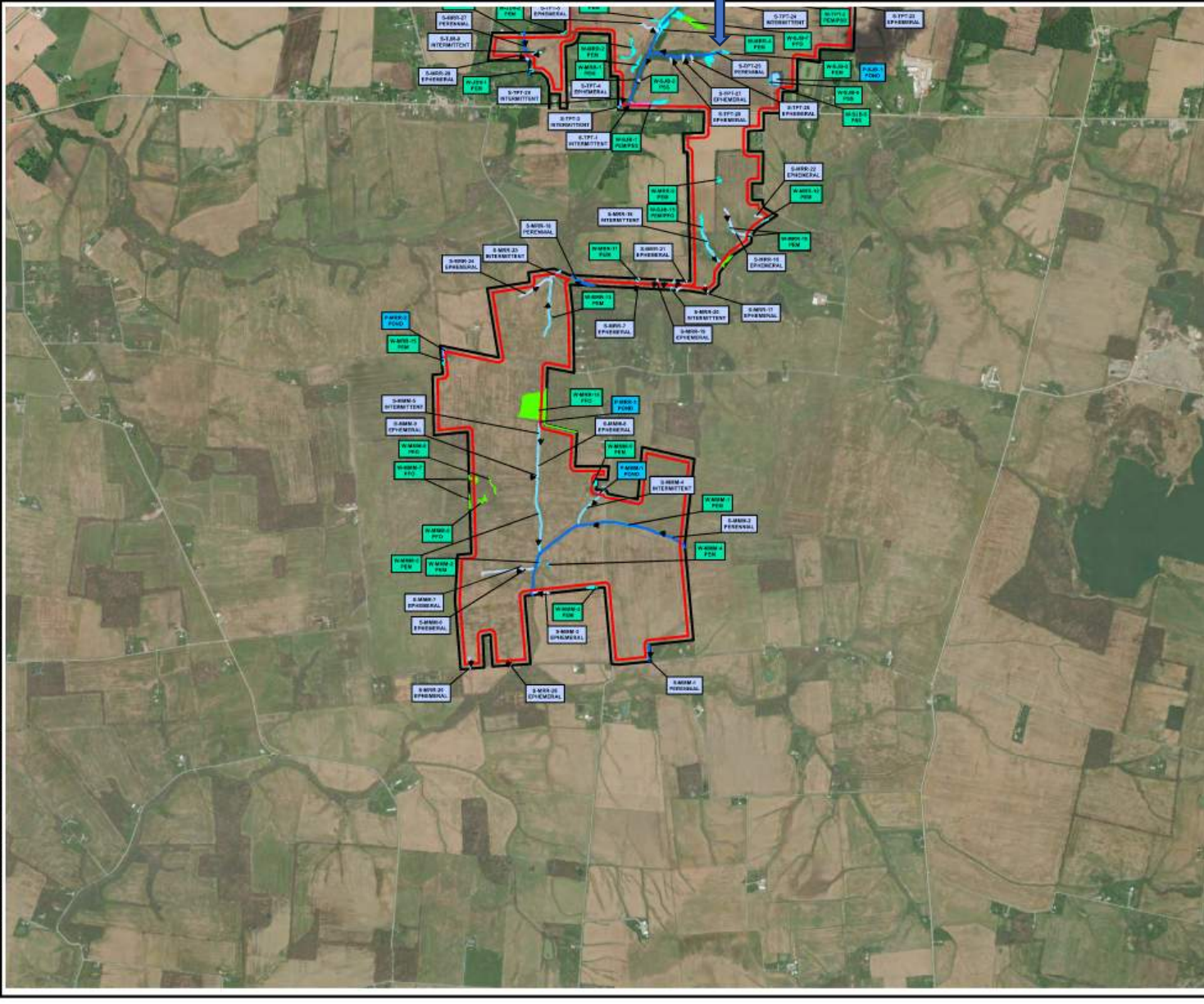
Shaun Kline, Ph.D., P.E.
Vice President, Permitting Compliance
Email: skline@ENVSI.com
Mobile: 352.514.3340

Attachments:

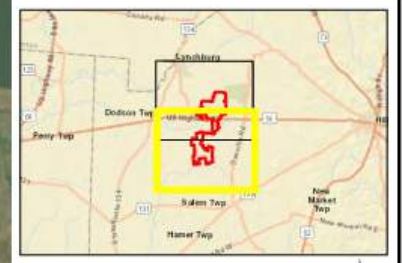
1. Phase I Archaeological Reconnaissance, Dodson Creek Solar Project, Dodson, Hamer, and Union Townships, Highland County, Ohio performed by Cardno, Inc. (Cardno) and dated 2 July 2021;
2. Historic Architectural Reconnaissance, Dodson Creek Solar Project, Union, Dodson, and Hamer Townships, Highland County, Ohio performed by Cardo and dated 24 May 2021;
3. Jurisdictional Waters Delineation Report, Dodson Creek Solar, LLC, Highland County, Ohio performed by TRC Environmental Corporation (TRC) dated April 2021; and
4. Phase I Environmental Site Assessment, Dodson Creek Solar, LLC, Highland County, Ohio performed by TRC dated 23 April 2021.

Spickard Station Area

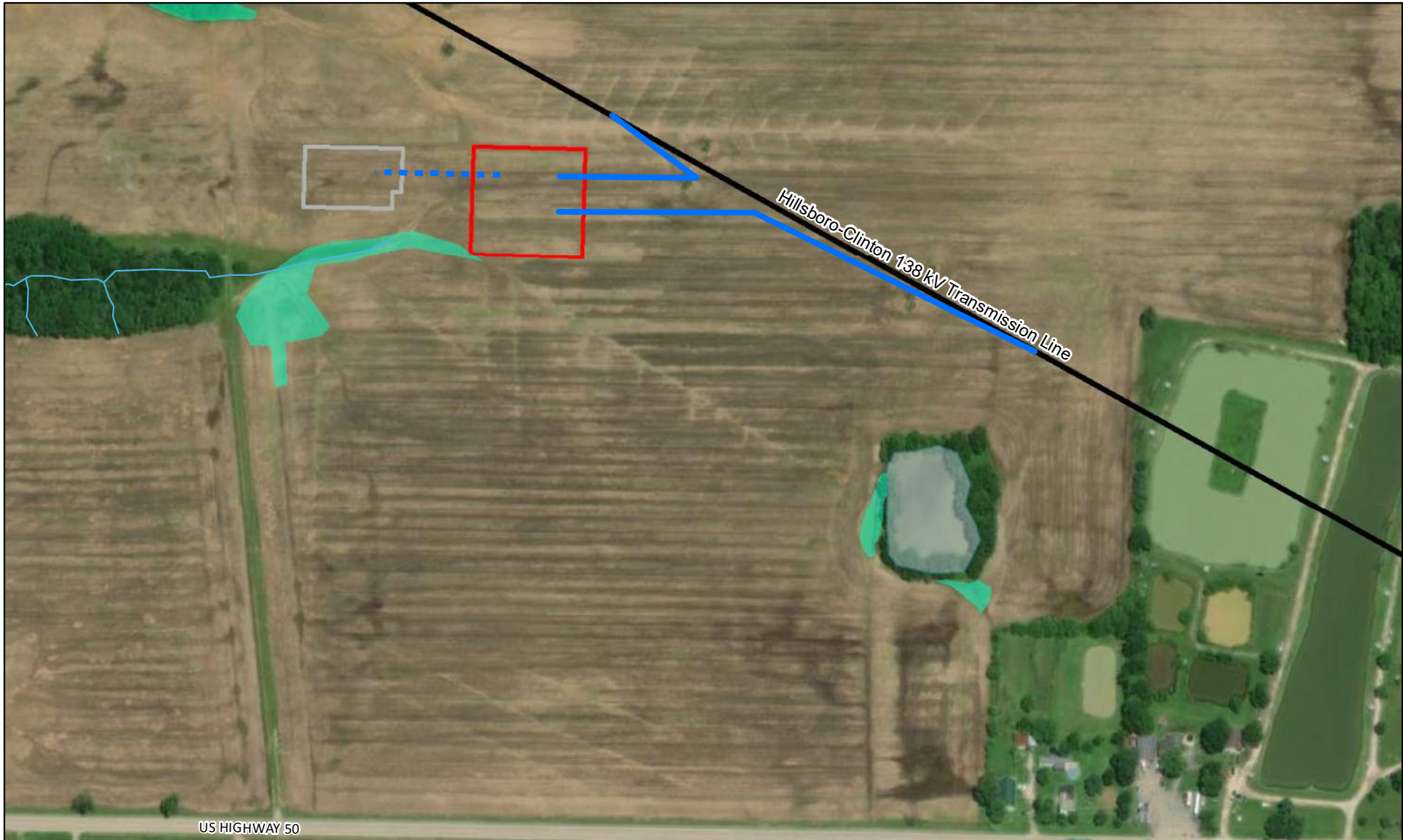
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 Path: S:\PROJECTS\NATIONAL_GRID\416571_DobsonCreekEN2_Fig4A_SWRResources_11x17.mxd
 Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet (Foot US)
 Map Rotation: 0
 ZTC - GZ


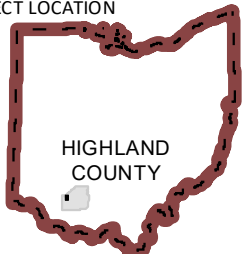

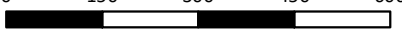


- FIELD SURVEY AREA
- FACILITY BOUNDARY
- DELINEATED STREAM (PERENNIAL)
- DELINEATED STREAM (INTERMITTENT)
- DELINEATED STREAM (EPHEMERAL)
- STREAM FLOW
- DELINEATED POND
- DELINEATED PALUSTRINE EMERGENT (PEM) WETLAND
- DELINEATED PALUSTRINE FORESTED (PFO) WETLAND
- DELINEATED PALUSTRINE SCRUB-SHRUB (PSS) WETLAND



PROJECT			
DODSON CREEK SOLAR, LLC			
TITLE			
FIELD VERIFIED SURFACE WATER RESOURCES			
DRAWN BY:	M. OPEL	PROJECT NO.:	416571
CHECKED BY:	M. RAY		
APPROVED BY:	J. PITTS		
DATE:	MAY 2021		
FIGURE 4B			
		781 Science Blvd, Suite 200 Columbus, OH 43229 Phone: 614-423-6334 www.trcsolutions.com	
FILE NO.:		E:\fig_4B_SWRResources_11x17.mxd	



<p>Legend</p> <ul style="list-style-type: none"> Proposed Spickard Station Fence Proposed 138 kV Transmission Line Cut-in Proposed 138 kV Gen-tie Proposed IPP Station Existing Transmission Line Delineated Wetland Stream Surface Water 	<p>Data Sources: AEP, ESRI World Imagery, 2021</p> <hr/> <p>Ohio State Plane South NAD 1983</p> <div style="text-align: center;">  </div> <hr/> <p>August 02, 2023</p>	<p>PROJECT LOCATION</p> <div style="text-align: center;">  <p>HIGHLAND COUNTY</p> </div> <hr/> <p>HIGHLAND COUNTY, OHIO</p>	<p>ECOLOGICAL SURVEY FEATURES</p> <div style="display: flex; justify-content: space-between; align-items: center;"> <div data-bbox="1554 1356 1701 1445">  </div> <div data-bbox="1743 1356 1995 1437"> <p style="text-align: right;">Spickard Station Hillsboro-Clinton 138 kV Cut-in Spickard-Dodson Creek Solar</p> </div> </div> <hr/> <div style="display: flex; align-items: center;"> <div style="flex: 1;"> <p>0 150 300 450 600</p>  <p style="text-align: right;">Feet</p> </div> </div>
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