

Construction Notice for Flatlick 765 kV Station Expansion Project



An **AEP** Company

BOUNDLESS ENERGY™

PUCO Case No. 23-0012-EL-BNR

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

Submitted by:
Ohio Power Company

January 19, 2023

Construction Notice
Ohio Power Company
Flatlick 765 kV Station Expansion Project

4906-6-05

Ohio Power Company (the “Company”) provides the following information to the Ohio Power Siting Board (“OPSB”) in accordance with the requirements of Ohio Administrative Code (“OAC”) Section 4906-6-05.

4906-6-05(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 the Flatlick 765 kilovolt (“kV”) Station Expansion Project (“the Project”), located in Wilkesville Township, Vinton County, Ohio. The Project includes expanding the existing Flatlick Station by constructing a new perimeter fence. The existing 13-acre fenced area is located on an approximately 122-acre property. The Project will expand the total fenced station area by approximately 0.05 acre, or 0.4% of the existing fenced area.

The Project will be constructed on a single property. Figures 1 and 2 in Appendix A show the location of the Project in relation to the surrounding area, the location of the existing station fence, and the proposed fence expansion.

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

(4) *Construction 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. 23-0012-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.

OAC 4906-6-05(B)(2) applies only to electric power, gas, and natural gas transmission lines and is therefore not applicable to this station expansion Project. Nonetheless, this Project is necessary to enable the Company to add equipment and infrastructure that will bring Flatlick Station up to current resiliency, safety, and operational performance, and North American Electric Reliability Corporation (“NERC”) reliability standards.

As this Project results in no operational, modeling, or topology change, the Project will not be included in the PJM Regional Transmission Expansion Plan. This Project is not included in Form FE-T10 of AEP’s Ohio’s or AEP Ohio Transco’s 2020 Long-Term Forecast Reports because Flatlick Station is an existing substation. Flatlick Station was included as an existing substation in the Company’s 2022 Form FE-T8, on page 76 of 88.

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 facilities and transmission lines is shown on Figures 1 and 2 in 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 proposed Project is located on a single property. The fence will be expanded where required to meet NERC standards and to maintain minimum clearance of existing station equipment and transmission lines. Relocation of the station was not feasible as the expansion of the fence is minimal, representing the least impactful solution. Construction designs have avoided impacts to wetlands and streams. The location of the Project minimized impacts to nearby residences and the environment, while taking into account the engineering and construction needs of the Project. Therefore, no significant alternatives were studied as part of the Project.

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.

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The Project will be located entirely within an existing Company easement on a single parcel, 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.

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 proposed to begin in April 2023, and the anticipated in-service date will be approximately June 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, depicted on the Wilkesville, Ohio U.S. Geological Survey (USGS) 7.5 series topographical map, provides locations of existing facilities and the Project location at a scale of 1:24,000, and Figure 2 provides a 2019 aerial imagery showing roads and highways, clearly marked with Project components at a scale of 1:4,800.

To visit the Project from Columbus, take US-33 E towards Athens. Follow signs for US-50 W and OH-32 W towards Albany, then turn left onto OH-689 S to OH 160 S. Take a left on OH-160 S and the Project area will be on your right. The coordinates of the entrance to the Project area are latitude 39.082513°N, longitude -82.329655°W.

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 Project will be located entirely within a single parcel, with no additional property owners or tenants affected. A list of properties required for the Project are provided in Table 1 below.

Table 1. List of Parcels within the Flatlick 765 kV Station Expansion Project

Parcel Identification No.	Easement Agreements/Option to Obtain
17-00466.004	Yes

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 Flatlick Station operating characteristics will not change because of this Project and no additional station equipment will be required. The substation fence expansion will involve the expansion of the existing perimeter fence.

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.

B(9)(b)(i) Calculated Electric and Magnetic Field Strength Levels

i) Calculated Electric and Magnetic Field Levels

Not applicable. There are no occupied residences or institutions located within 100 feet of the Project.

B(9)(b)(ii) Design Alternatives

A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

Not applicable. There are no occupied residences or institutions located within 100 feet of the Project.

B(9)(c) Project Cost

The estimated capital cost of the project.

The cost estimate for the proposed Project, comprised of applicable tangible and capital costs, is Class 4 and is approximately \$ 12,000,000. Pursuant to the PJM OATT, the costs for this Project will be recovered in the Ohio Power Company's FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Economic Impacts

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

B(10)(a) Land Use Characteristics

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

The Project is located within Wilkesville Township in Vinton County, Ohio. The land use in the Project area consists of undeveloped land including old field, second growth deciduous forest, second growth coniferous forest, wetlands, streams, and commercial land. No tree clearing is anticipated for the Project. Two residences are located within 1,000 feet of the Project area. There are no parks, schools, churches, cemeteries, wildlife management areas, or nature preserve lands within 1,000 feet of the Project area.

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.

According to phone conversation with the Vinton County Auditor's Office, as of November 30, 2022, the Project is located on a single parcel, which is not registered agricultural district land. Additionally, no agricultural land is located within the Project area. Therefore, there are no planned impacts to agricultural district land or agricultural 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 Company's consultant conducted a Phase I Archaeological Investigation and History/Architecture Investigation for the Project in October 2017. The investigations did not result in the identification of any archaeological sites. No further archaeological work is considered necessary for this Project. During the architectural investigations, all the identified resources were found to be considered not eligible for the National register of Historic Places ("NRHP") as they were all identified as Vernacular in style and have experienced multiple alterations that have compromised their historic integrity. In addition, no historic properties were identified within the Project or study areas. Therefore, the consultant concluded that the Project would have no effect on historic properties. Correspondence from the State Historic Preservation Office ("SHPO") was received on November 22, 2017, see Appendix B. The SHPO correspondence letter stated that the Project will have no effect on historic properties and that no further archaeological work is necessary.

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.

The Project proposes less than one acre of land disturbance to complete the fence expansion. Therefore, no General Permit OHC000005 from the Ohio Environmental Protection Agency (“OEPA”) is required for the Project. However, the Company will implement and maintain best management practices (“BMPs”) to minimize erosion and control sediment to protect surface water quality during storm events.

The Project will avoid impacts to streams and wetlands. Therefore, no permit is required under the Clean Water Act Section 404/401.

The Project is not located within Federal Emergency Management Agency (“FEMA”) 100-year floodplain area (FEMA Flood Insurance Rate Map, Panel 390718, Map Number 3905530007B, Effective Date June 01, 1992). Therefore, no floodplain permitting is required for the Project.

There are no other known local, state or federal requirements that must be met prior to commencement of the 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 response letter from the USFWS, dated May 18, 2022, (see Appendix B) stated that the Project is within the range of the Indiana bat (*Myotis sodalis*; federally endangered) and northern long-eared bat (*Myotis septentrionalis*; federally threatened) and that habitat removal or forest clearing, could result in significant impacts to Indiana bats. However, the Project will not require any tree clearing, therefore, impacts to federally listed bat species are not anticipated.

The USFWS letter did not include any comments specific to other federally-listed species.

A coordination letter was submitted via email to the ODNR – Office of Real Estate on May 10, 2022 seeking an environmental review of the proposed Project for potential impacts on state-listed species. Correspondence from ODNR – Office of Real Estate was received on June 6, 2022 (see Appendix B).

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According to the ODNR – Office of Real Estate, the Project area is within the range of the Indiana bat, northern long-eared bat, tricolored bat (*Perimyotis subflavus*), and the little brown bat (*Myotis lucifugus*). If suitable habitat occurs within the Project area, the ODNR recommends trees be conserved wherever possible. If suitable habitat occurs within the Project area and trees must be cut, ODNR recommends cutting only occur between October 1 and March 31. If suitable trees must be cut during the summer months, the response letter recommended a mist net survey be conducted between June 1 and August 15, prior to any cutting. If no tree removal is proposed, this Project is not likely to impact these species. In addition, ODNR recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within 0.25 mile of the Project area. The Project will not require any tree clearing, therefore, impacts to state-listed bat species are not anticipated.

The ODNR-Office of Real Estate also stated that the Project area is within the range of one mussel species, four fish species, the timber rattlesnake (*Crotalus horridus*), the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), the midland mud salamander (*Pseudotriton montanus diastictus*), and the eastern spadefoot toad (*Scaphiopus holbrookii*). The ODNR stated that due to the location, the type of habitat within the Project area, the type of work proposed, this Project is not likely to impact these listed species.

The Project area is also within the range of the northern harrier (*Circus hudsonis*). However, ODNR stated that if no suitable nesting habitat is present within the Project area and/or if construction is avoided in suitable nesting habitat for this species during its nesting period (April 15 – July 31), the Project is not likely to impact this species. A qualified biologist assessed the habitat present within the limits of construction, which includes maintained lawn, second growth forest, and old field habitats. Northern harriers prefer larger marshes and grassland habitats for their nesting grounds. No suitable nesting habitat was observed within the construction limits, therefore, no impacts to this species are anticipated.

Additionally, the ODNR-Office of Real Estate response included a Natural Heritage Database record search and stated that there are no records of state or federally listed plants or animals within one mile of the Project area.

B(10)(f) Areas of Ecological Concern

Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Coordination letters were submitted to the ODNR and USFWS in May 2022 requesting a review of the Project area and identification of areas of ecological concern. Responses indicated that there are no areas of ecological concern reported as occurring at or within one mile of the Project area. Correspondence received from the USFWS indicated that there is no designated critical habitat in the Project vicinity (see Appendix B).

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The FEMA Flood Insurance Rate Map was consulted to identify any floodplains/flood hazard areas that have been mapped in the Project area (specifically, FEMA, Flood Insurance Rate Map, Panel 390718, map number 3905530007B). Based on this map, no mapped FEMA floodplains are located in the Project area.

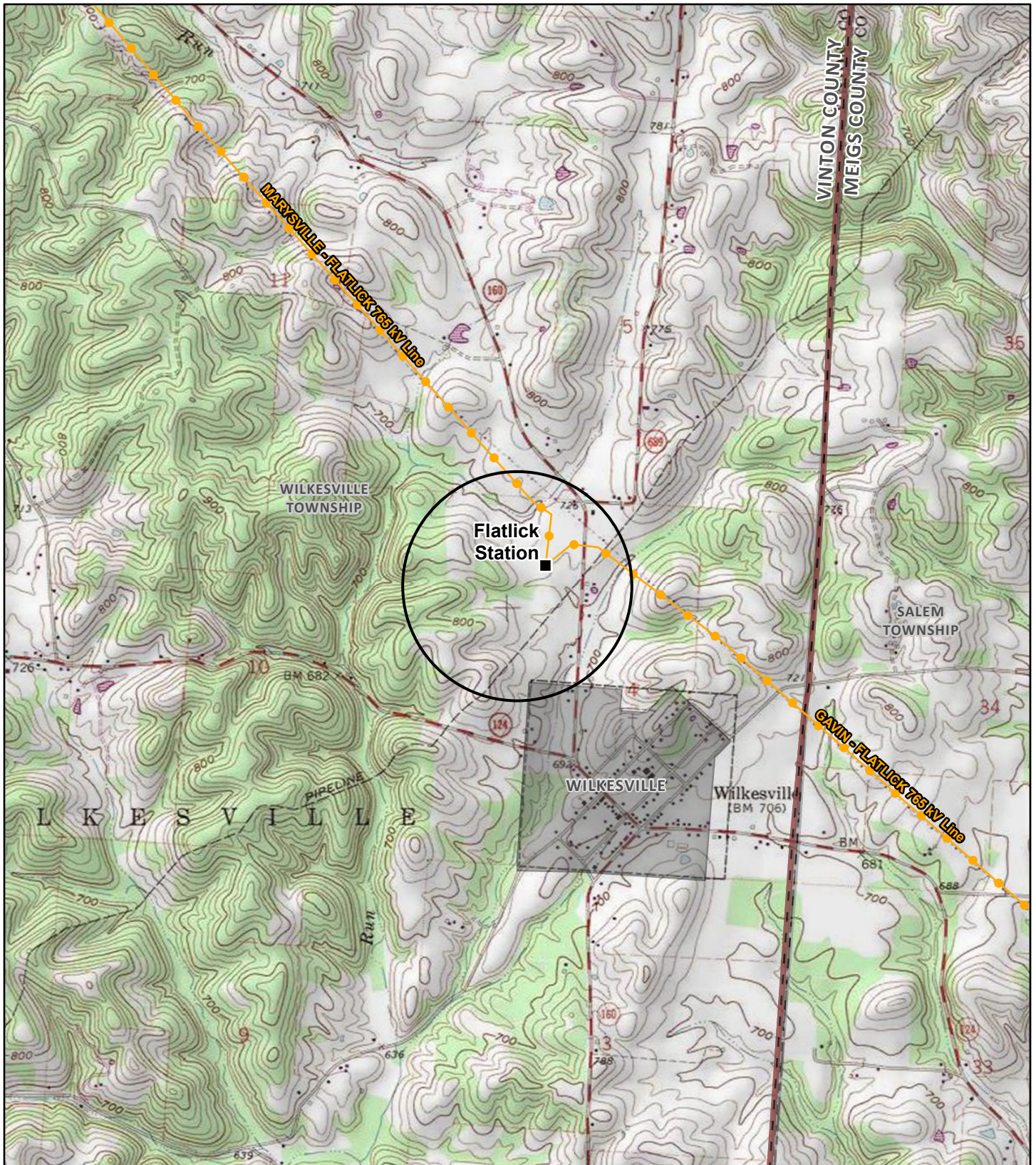
Wetland and stream delineation field surveys were completed within the Project area by the Company's consultant in April 2022. The results of the wetland and stream delineations are presented in the Ecological Survey Report included in Appendix C. There were 16 wetlands, 10 streams and two open water features that were identified within the Project area (see Appendix C). No streams or wetlands will be 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 and Figures



Legend

- Substation
- Existing Transmission Line (345 kV+)
- Project Location
- ▭ Municipal Boundary
- ▭ Township Boundary
- ▭ County Boundary

Data Sources: AEP, Stantec, ESRI, USGS 7.5' Topographic Quadrangles

Coordinate System and Datum
NAD 1983 State Plane
Ohio North



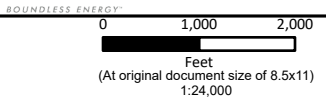
December 20, 2022

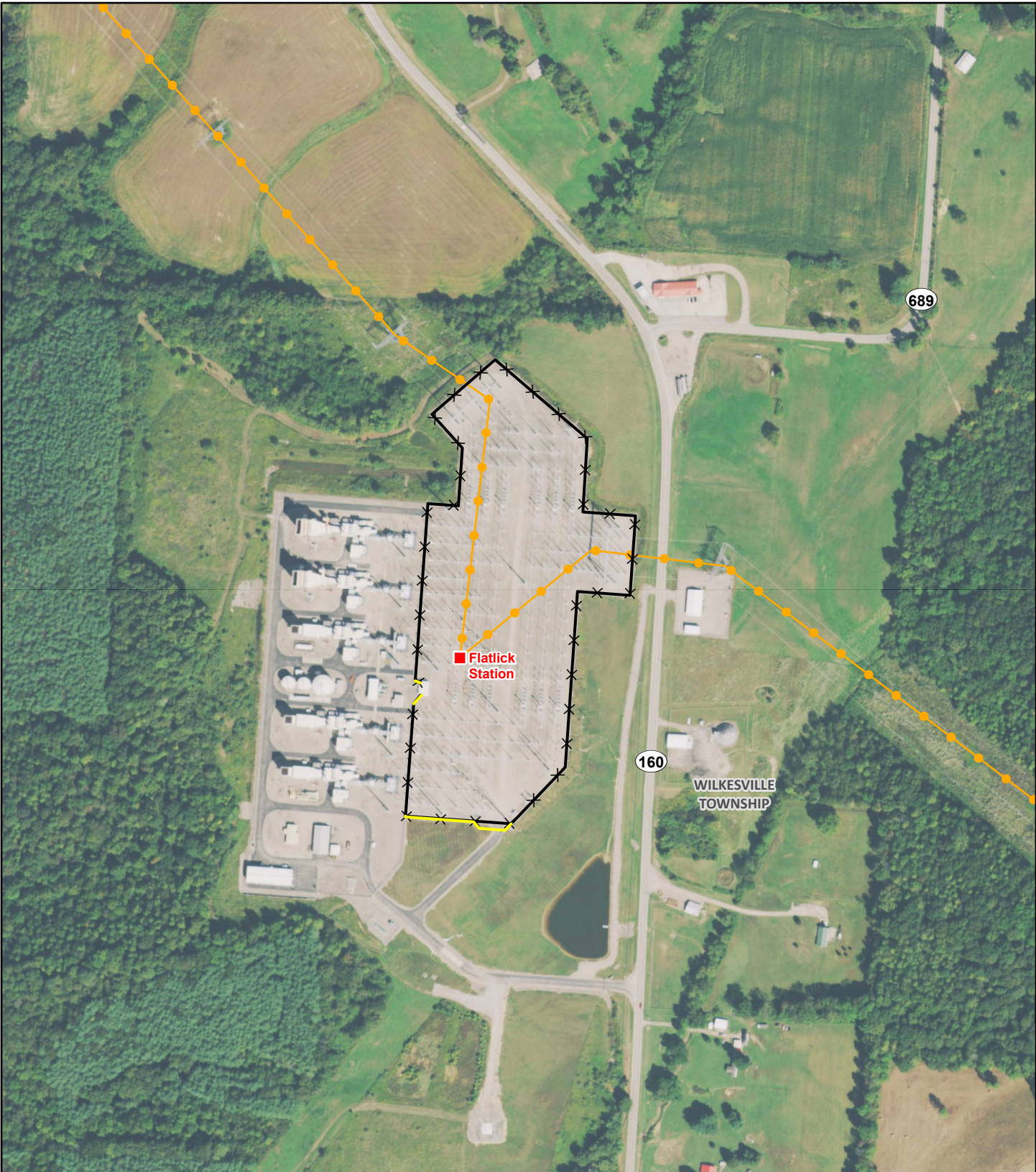


FIGURE 1
TOPOGRAPHIC OVERVIEW MAP



**Flatlick 765 kV Station
Expansion Project**





Legend

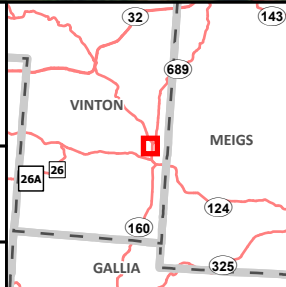
- Substation
- Existing Transmission Line (345 kV+)
- Proposed Station Fence Expansion
- ✕ Existing Station Fence

Data Sources: AEP, Stantec,
OGRIP, HIFLD,
NAIP (2019)

Coordinate System
and Datum
NAD 1983 State Plane
Ohio North



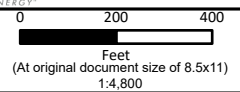
December 20, 2022



**FIGURE 2
AERIAL MAP**



**Flatlick 765 kV Station
Expansion Project**



Appendix B Agency Correspondence



In reply refer to
2017-VIN-40324

November 22, 2017

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

RE: Flatlick Station Safety Fence Project, Wilkesville Township, Vinton County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on October 27, 2017 regarding the proposed Flatlick Station Safety Fence Project, Wilkesville Township, Vinton 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 4906-4). 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 (16 U.S.C.470 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for the 49.8 ha (123 ac) Flatlick Station Safety Fence Project in Wilkesville Township, Vinton County, Ohio* by Weller & Associates, Inc. (2017).

A literature review and visual inspection was completed as part of the investigations. The entirety of the project area has been previously investigated in 2000 by Cultural Resource Analysts, Inc. in the *A Cultural Resource Assessment of the Proposed Rolling Hills Generation Plant in Wilkesville Township, Vinton County, Ohio* (NADB#18156) and in *A Phase II National Register Evaluation of the Soule-Newsom House Site (33 VI 614) in the Proposed Rolling Hills Generating Plant in Wilkesville Township, Vinton County, Ohio* (NADB#18157), completed in 2001 also by Cultural Resource Analysts, Inc. The thirteen (13) Ohio Archaeological Inventory (OAI) sites (33VI0611-33VI0623) located within the project area were found to be not eligible for listing in the National Register of Historic Places (NRHP). While OAI#33VI0614 was investigated in 2001 for the potential of NRHP-eligibility, it was found to be not eligible for listing. We agree no further archaeological work is necessary.

It was noted during review that two OAI sites, 33VI0614 and 33VI0618, are mislocated on the SHPO online GIS mapping and, therefore, mislocated on the report mapping. The SHPO online GIS database will be updated with the correct coordinates for these sites. The mislocation of these sites does not change our coordination and we still agree no further archaeological work is necessary.

The following comments pertain to the *History/Architecture Investigations for the 49.8 ha (123 ac) Flatlick Station Safety Fence Project in Wilkesville Township, Vinton County, Ohio* by Weller & Associates, Inc. (2017).

The investigations consisted of a systematic survey of all properties fifty years of age or older that are situated within 1,000' of the proposed project site. Four previously recorded Ohio Historic Inventory (OHI) properties were identified within the APE (VIN0046112, VIN0016412, VIN0017312, and VIN0018512). VIN0046112 and VIN0018512 were found during the field survey to have been previously demolished. Additionally, three individual properties of fifty years of age or older were identified within the APE.

RPR Serial No: 1071073, 1071074

Mr. Ryan J. Weller
Page 2
November 22, 2017

It is Weller's recommendation that none of these properties are eligible for inclusion in the National Register of Historic Places due to a lack of associative significance, a loss of integrity, or a lack of character defining features. Our office agrees with Weller's recommendations regarding eligibility.

The results of the architectural investigation identified no historic properties located within the APE that exhibit potential significance for inclusion in the National Register of Historic Places. Therefore, we agree that the project as proposed will have no effect on historic properties.

Based on the information provided, we agree the project will not affect 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. Thank you for your cooperation.

Sincerely,



Krista Horrocks, Project Reviews Manager
Resource Protection and Review

cc: Ron Howard, AEP (rmhoward@aep.com)

RPR Serial No: 1071073, 1071074

OHIO HISTORY CONNECTION

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • ohiohistory.org

From: Ohio, FW3 <ohio@fws.gov>
Sent: Wednesday, May 18, 2022 9:18 AM
To: Teitt, Matthew
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate; Amy J Toohey; Gillette, Tyler
Subject: Flatlick Station Expansion Project, City of Wilkesville, Vinton County, Ohio
Attachments: [2022 USFWS Federally Listed Bat Permitees - Ohio.pdf](#)
Follow Up Flag: Follow up
Flag Status: Flagged



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 # 2022-0030789

Dear Mr. Teitt,

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

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

Female Indiana bats exhibit strong site fidelity to summer roosting and foraging areas, meaning that they return to the same area, and often the same trees, to roost year after year. Because the project will result in a large amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal could result in significant impacts to Indiana bats. Because of this, the proposed project may result in indirect adverse effects to Indiana bats, even if tree clearing is conducted during the winter season when Indiana bats are not present. Therefore, we recommend that a summer survey be conducted to determine presence or absence of Indiana bats at the project site. The summer survey must be conducted in coordination with the Ohio Field Office.

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 also warranted. Portal surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office.

Survey results should be coordinated with this office prior to initiation of any work at the project area. Based on the results of the survey(s), we will evaluate potential impacts to the Indiana bat from the proposed project. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year.

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.

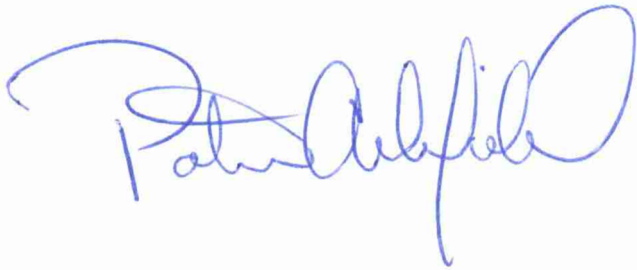
Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their

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 M. Ashfield". The signature is fluid and cursive, with a large initial "P" and "A".

Patrice M. Ashfield
Field Office Supervisor

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



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate
John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
Fax: (614) 267-4764

June 6, 2022

Matthew Teitt
Stantec
1500 Lake Shore Drive Suite 100
Columbus OH 43204-3800

Re: 22-0495; AEP Flatlick Station Expansion Project

Project: The proposed project involves the expansion of Flatlick Station.

Location: The proposed project is located in the Village of Wilkesville, Vinton 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 \geq 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 Eileen Wyza at Eileen.Wyza@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 Eileen Wyza 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 little spectaclecase (*Villosa lienosa*), a state endangered mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

The project is within the range of the northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, the Ohio lamprey (*Ichthyomyzon bdellium*), a state endangered fish, the spotted darter (*Etheostoma maculatum*), a state endangered fish, and the Tippecanoe darter (*Etheostoma tippecanoe*), a state threatened fish. Due to the location, and that there is no in-water work proposed in a perennial stream, 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. In addition to using wooded areas, the timber rattlesnake also utilizes sunlit gaps in the canopy for basking and deep rock crevices known as den sites 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 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 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 eastern spadefoot toad (*Scaphiopus holbrookii*), a state endangered species. This species is found in areas of sandy soils that are associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions. 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.

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

Appendix C Ecological Survey Report