

Construction Notice for the Hartman Farms 138 kV Extension No. 6 Transmission Line Project (Phase 2)



An **AEP** Company

BOUNDLESS ENERGY™

PUCO Case No. 23-0705-EL-BNR

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

Submitted by:
Ohio Power Company

June 30, 2023

CONSTRUCTION NOTICE FOR HARTMAN FARMS 138 KV EXTENSION NO. 6 TRANSMISSION LINE PROJECT (PHASE 2)

CONSTRUCTION NOTICE

Ohio Power Company

Hartman Farms 138 kV Extension No. 6 Transmission Line Project (Phase 2)

4906-6-05 Accelerated Application Requirements

Ohio Power Company (the Company) provides the following information to the Ohio Power Siting Board (OPSB) in accordance with the accelerated application requirements of Ohio Administrative Code 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 Construction Notice.

The Company is proposing the Hartman Farms 138 kV Extension No. 6 Transmission Line Project (Phase 2) (the "Project"), in Hamilton Township, Franklin County, Ohio. The Project consists of constructing two approximately 0.4-mile single circuit, greenfield, 138 kV transmission lines. The Project will tie into the existing steel monopoles previously constructed under the Hartman Farms 138 kV Extension No. 5 and No. 6 project (approved in Case No. 21-1057-EL-BNR) and extends south to the customer's new, non-jurisdictional station. The Project is located on property owned by the customer and will support the customer's new development in the area. The location of the Project is shown on Figure 1 and 2 in Appendix A.

The Project meets the requirements for a Construction Notice (CN) as defined by Item 1 (d)(i) of Appendix A to Ohio Administrative Code Section 4906-1-01, *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 property owned by the specific customer or the applicant.

The Project has been assigned Case No. 23-0705-EL-BNR.

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B(2) Statement of Need

If the proposed Construction Notice project is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.

An existing customer is requesting two additional 138 kV deliveries at their site south of AEP Ohio Transmission Company, Inc.'s existing Cyprus Station in Lockbourne, Ohio. The peak demand at the two new customer delivery points is expected to be 200 MW. The new deliveries will bring the total peak demand for the site up to 300 MW with a potential ultimate site peak demand of 675 MW. In order to support the new load, 345/138 kV transformation will be established at Cyprus Station to reinforce the nearby 138 kV system.

To provide 138 kV service to the customer's new deliveries, AEP Ohio Transmission Company will be expanding Cyprus Station. Cyprus Station will be expanded to accommodate additional circuit breakers and transformers to integrate two new 345 kV sources, as well as to extend four additional 138 kV circuits to the customer south of the station. The two new Cyprus 345 kV sources will be established by construction of a greenfield 1.6-mile double circuit 345 kV line that will cut-in to the existing Beatty-Bixby 345 kV circuit, to be filed separately. Finally, to accommodate the Cyprus Station expansion the existing Cyprus 138 kV extension will require one circuit to be relocated at the station.

To serve the customer, Ohio Power Company will extend the two existing circuits constructed under the previously approved Hartman Farms 138 kV Extension No. 5 and No. 6 Project (Case No. 21-1057-EL-BNR) to the customer's building #2 station, which is the subject of this filing. The Project involves installing approximately 0.4 miles of two single circuit greenfield 138 kV lines. Further, the Company will construct two double circuit greenfield 138 kV transmission lines to serve the customer's building #3 and building #4 substations, to be filed separately. These double circuit lines measure approximately 0.9 and 0.7 miles. To meet the customer's redundancy requirements to the sites, one circuit from each double-circuit line will provide service to the customer-owned station on the site.

Further, system reinforcements will be required on the existing Beatty – Canal Street 138 kV line that has several clearance issues that will be mitigated in order to increase the capacity on the line to serve the load, to be filed separately.

The customer has requested an in-service date (ISD) of January 31, 2024 for service to their building #2 station and is targeting December 2024 for the building #3 service as well as the 345 kV Cyprus Station and Cyprus 345 kV Extension.

Failure to move forward with the proposed project will result in the inability to serve the customer's load expectations and thereby jeopardize the customer's plans in the Southeast Columbus area (potentially 675 MW peak). The work described enables the 200 MW expansion requested by the customer. As the customer moves forward toward the full 675 MW build out, any additional solutions required to serve the load will be taken through the PJM process and filed with OPSB as needed.

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The need and solution for this supplemental project was presented and reviewed with stakeholders at the October 14, 2022 and May 9, 2023 PJM TEAC meetings. The Project has not yet been assigned a PJM identifier to date but one is anticipated in late summer 2023, see Appendix B. The 2023 Long Term Forecast Report was submitted prior to the solution being identified and presented pursuant to PJM's M-3 process, but it will be included in the Company's supplemental 2023 LTFR.

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 lines and substations is shown on Figure 1, in Appendix A. Figure 2, in Appendix A, identifies the Project components on a 2022 aerial photograph.

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, located on customer property and based on the customer's proposed development and existing facilities in the area, is the most suitable location for the Project. Other alternatives would require impacting neighboring properties, as opposed to remaining entirely on the customer's property. The Project is located on land currently under development, comprised of a mix of fill material devoid of any significant vegetation and developed open space, which is regularly maintained and comprised primarily of disturbance tolerant non-native lawn grasses and forbs. The Project will not require impacts to any delineated wetland or streams. The location of the Project minimizes impacts to the community and the environment, while considering the engineering and construction needs of the customer. The Project therefore represents the most suitable location and most appropriate solution for meeting the Company's and customer's needs.

B(5) Public Information Program

The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

The Company maintains a website (<http://aeptransmission.com/ohio/>) on which an electronic copy of this CN is available. An electronic copy of the CN will be served to the public library in each political subdivision affected by this Project. In addition, the Company retains ROW land agents that discuss Project timelines, construction and restoration activities and convey this information to affected owners and tenants.

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B(6) Construction Schedule

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

Construction of the Project is planned to begin in October 2023 with an anticipated in-service date of January 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, identifies the location of the Project area on the Lockbourne United States Geological Survey 1:24,000 quadrangle map. Appendix A, Figure 2 displays the Project components on a 2022 aerial photograph.

To visit the endpoint of the Project from downtown Columbus, Ohio, take I-70 W/I-71 S toward I-71S to Cincinnati for 5.5 miles. Take exit 101 for I-270 E for two miles. Take exit 52 to merge onto US-23 S/S High Street/Portsmouth-Columbus Road towards Circleville for one mile. Turn left on Rathmell Road and continue for 0.8 mile. Turn right onto Parsons Road and continue for 0.7 miles. The project is located to the west of Parsons Road.

B(8) Property Agreements

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

The proposed Project is located on one parcel, Parcel Number 510-180711, which is owned by the customer. The Company has not yet obtained an easement on the customer's property for the Project but it will be obtained prior to the start of construction. No other property easements, options, or land use agreements are necessary to construct the Project or operate the transmission line.

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

Property Parcel Number	Agreement Type	Easement or Option Obtained (Yes/No)
510-180711	New Easement Agreement	No

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B(9) Technical Features

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

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

The transmission line cut-in from the Hartman Farms 138 kV Extension No. 6 Phase II will include the following:

Voltage: 138 kV
Conductors: Double Circuit, 795 kcmil ACSS 26/7 Strands DRAKE
Static Wire: Two (2) 7#8 Alumoweld
Insulators: Polymer
ROW Width: 100 feet
Structure Type: One (1) 2-pole steel dead-end on a self-supporting concrete pier foundations
Two (2) 2-pole steel tangent structures with direct embed foundations

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.

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

B(9)(c) Project Cost

The estimated capital cost of the project.

The capital cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$2,600,000 based on a Class 4 estimate. Seventy percent (70%) of the costs of the Project for the transmission line construction will be recovered through reimbursement from the customer. The remaining thirty percent (30%) of the costs for the Project will be recovered in Ohio Power Company's FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone pursuant to the PJM OATT. Forty percent (40%) of the costs of the ROW portion of the Project will be recovered through reimbursement from the customer. The remaining sixty percent (60%) of the costs for the ROW portion of the Project will be recovered in Ohio Power Company's FERC formula rate and allocated to the AEP Zone pursuant to the PJM OATT.

B(10) Social and Economic Impacts

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

B(10)(a) Operating Characteristics

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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 in Hamilton Township, Franklin County, Ohio. Land use in the Project area is currently under development, comprised of a mix of fill material devoid of vegetation and developed open space, as classified by the Franklin County Auditor. A residential subdivision is located approximately a half mile north of the Project. There are no schools, parks, churches, cemeteries, wildlife management areas, or nature preserve lands within 1,000 feet of the centerline of 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.

No properties registered as agricultural district land are located in the Project area based on email coordination with the Franklin County Auditor's Office on June 14, 2023. The Project occupies 4.5 acres, all of which has historically been used for row crop land prior to development of the site by the Customer.

B(10)(c) Archaeological and Cultural Resources

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

The Company's consultant completed Phase I Archaeological and Phase I History/Architectural surveys to be coordinated with the State Historic Preservation Office ("SHPO"). The Company is recommending that the Project will have no adverse effect on historic properties and no further cultural resource work would be necessary. The results of the coordination with SHPO will be provided to OPSB once it has been received.

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 (OEPA) for authorization of construction storm water discharge under NPDES General Permit for Discharges of Storm Water Associated with Construction Activity OHC000006. The Company will also submit a Storm Water Pollution Prevention Plan (SWPPP) to the City of Columbus that adheres to the City's permit requirements. The Company will implement and maintain best management practices as outlined in the Project-specific SWPPP to minimize erosion and sediment to Project surface waters during storm events.

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The Project is not located within the Federal Emergency Management Agency (FEMA) 100-year floodplain area. Therefore, no floodplain permitting is expected to be required for the Project. A local stormwater permit will be obtained from the City of Columbus prior to the start of construction.

The Project is located in the City of Columbus Wellfield Protection Boundary. As defined by the City of Columbus-Chapter 1115 Wellfield Protection, the majority of the Project is located in Wellfield Protection Area II (Five year time of travel) and a small portion of the eastern area of the Project is located in Wellfield Protection Area I (1000' from collector well). In compliance with the City of Columbus's Chapter 1115, AEP has initiated coordination with the City's Wellfield Protection Coordinator. In compliance with Chapter 1115, plan notes for construction will be developed, and a Spill Prevention Control and Countermeasures (SPCC) Plan will be prepared. Coordination and approval for the City's wellfield protection aspect of the Project will be included in the City's approval of the station grading and stormwater package. All approvals are pending and will be provided upon receipt.

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.

On May 16, 2023, coordination letters were submitted to the United State Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review of the Project for potential impacts to state and/or federally protected species. ODNR and USFWS provided a response on May 24 and June 19, 2023, respectively. Copies of the agencies' response are presented in Appendix C.

The ODNR Natural Heritage Database identified two protected freshwater mussel species at or within a one-mile radius of the Project: the fawnsfoot (*Truncilla donaciformis*), and the deertoe (*Truncilla truncata*). The ODNR Natural Heritage Database also identified the Tippecanoe darter (*Etheostoma tippecanoe*), a state threatened fish species at or within a one-mile radius of the Project.

The ODNR DOW response indicated that the Project is within range of the following state or federal threatened, endangered, and/or protected freshwater mussel species: purple cat's paw (*Epioblasma o. obliquata*), the clubshell (*Pleurobema clava*), the northern riffleshell (*Epioblasma torulosa rangiana*), the rayed bean (*Villosa fabalis*), the snuffbox (*Epioblasma triquetra*), the rabbitsfoot (*Quadrula cylindrica cylindrica*), the elephant-ear (*Elliptio crassidens crassidens*), the long solid (*Fusconaia maculate maculate*), the Ohio pigtoe (*Pleurobema cordatum*), the pocketbook (*Lampsilis ovata*), the washboard (*Megaloniais nervosa*), the pondhorn (*Uniomerus tetralasmus*), and the Salamander mussel

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(*Simpsonaias ambigua*). The DOW indicated that due to the Project location and that there is no in-water work proposed in a perennial stream, the Project is not likely to impact these freshwater mussel species.

The ODNR DOW response indicated the Project lies within the range of the following state or federal threatened, endangered, and/or protected fish species: the goldeye (*Hiodon alosoides*), the Iowa darter (*Etheostoma exile*), the popeye shiner (*Notropis ariommus*), the northern brook lamprey (*Ichthyomyzon fossor*), the spotted darter (*Etheostoma maculatum*), the shortnose gar (*Lepisosteus platostomus*), the tonguetied minnow (*Exoglossum laurae*), the lake chubsucker (*Erimyzon sucetta*), and the paddlefish (*Polyodon spathula*). The DOW indicated that the Project is not likely to impact these fish species due to the Project location and that no in-water work is proposed in a perennial stream.

The ODNR DOW indicated that the entire state of Ohio is within the range of the state and federally endangered Indiana bat (*Myotis sodalis*), the state and federally threatened northern long-eared bat (*Myotis septentrionalis*), the state endangered little brown bat (*Myotis lucifugus*), and the state endangered tri-colored bat (*Perimyotis subflavus*). Furthermore, the DOW indicated that the Project is within the vicinity of records for the little brown bat. The DOW recommends seasonal tree cutting for trees ≥ 3 inches diameter at breast height (dbh) between October 1 and March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, to avoid adverse impacts to these species. 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. Potentially suitable habitat for these bat species may have been provided by forested areas of the Project footprint; however, a desktop assessment conducted prior to the field survey identified no potential hibernacula within a 0.5-mile radius of the Project. Additionally, no tree clearing is anticipated for the Project.

The USFWS advised that the federally endangered Indiana bat and the federally threatened northern long-eared bat have ranges within the Project Area. The USFWS recommends seasonal tree clearing (October 1 through March 31) if no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided. If implementation of seasonal tree cutting is not feasible for the Project, the USFWS recommends a summer presence/absence survey be conducted between June 1 and August 15 in coordination with the Ohio Field Office. No tree clearing is anticipated for the Project, therefore no impacts are anticipated to the Indiana bat or the northern long-eared bat.

The USFWS indicated that due to the project type, size, and location, no other adverse effects to any other federally protected species or designated critical habitat is anticipated.

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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.

On April 7, 2021 and May 25, 2023, the Company's consultant completed a wetland and stream delineation survey of an approximately 9.4-acre survey area, which encompasses the proposed Project in addition to a larger area (Appendix D). During the field surveys, no wetlands or streams were identified within the Project survey area. No other areas of ecological concern were identified within the Project area.

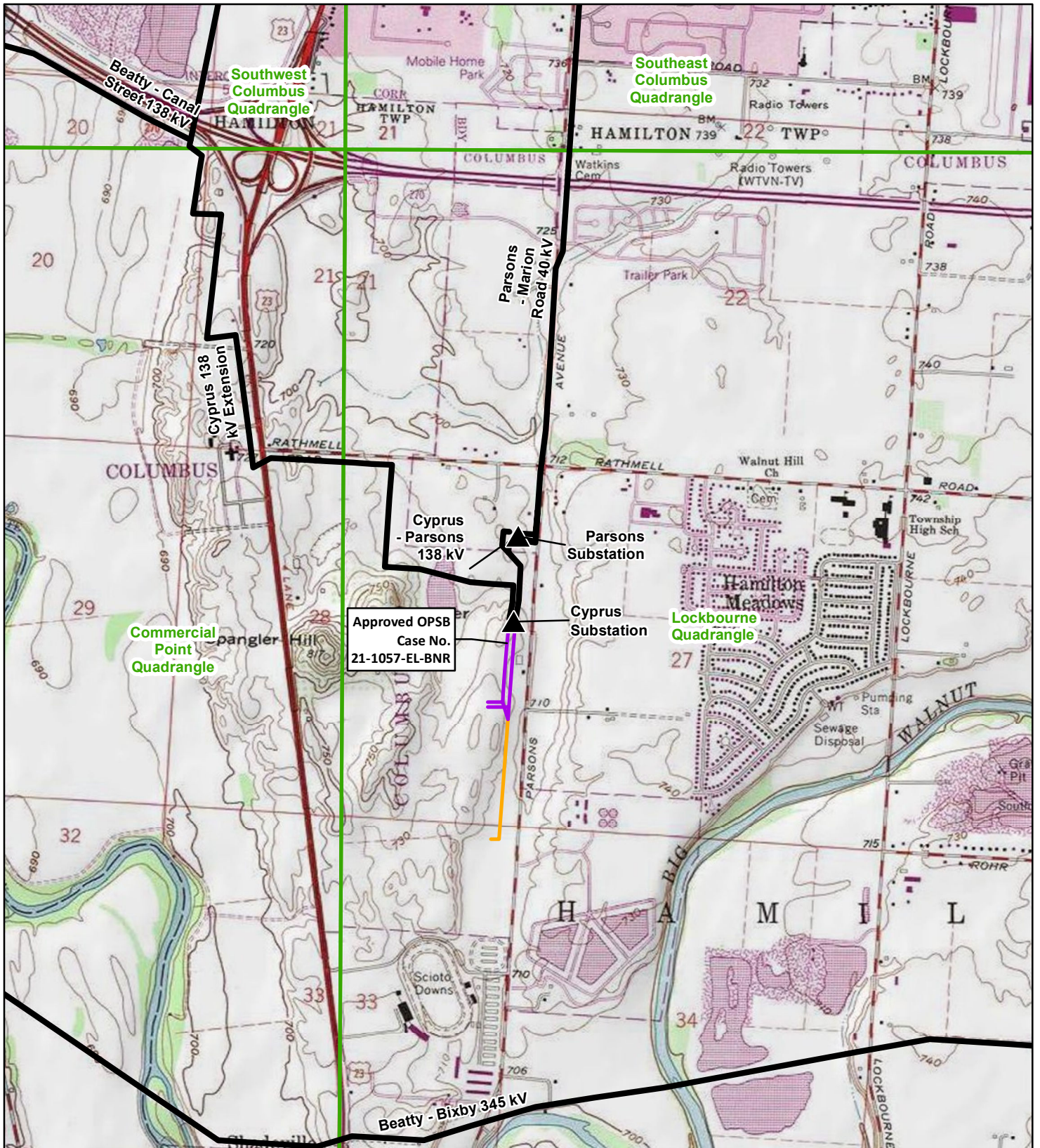
Based on a review of the Protected Areas Database of the United States as well as the Conservation Easement Database, there are no state or national parks, forests, wildlife areas or mapped conservation easements in the vicinity of the Project.

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

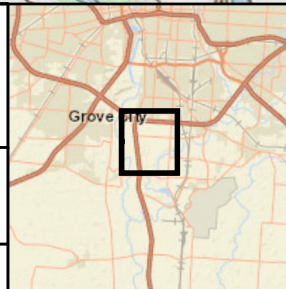


- ▲ Substation
- Hartman Farms 138 kV Extension No. 5 and No. 6
- Proposed Hartman Farms 138 kV Extension No. 6
- Existing Transmission Line
- USGS 7.5' Topographic Quad Boundary

Sources:
USGS (2020)

State Plane Ohio
South NAD 83

June 28, 2023

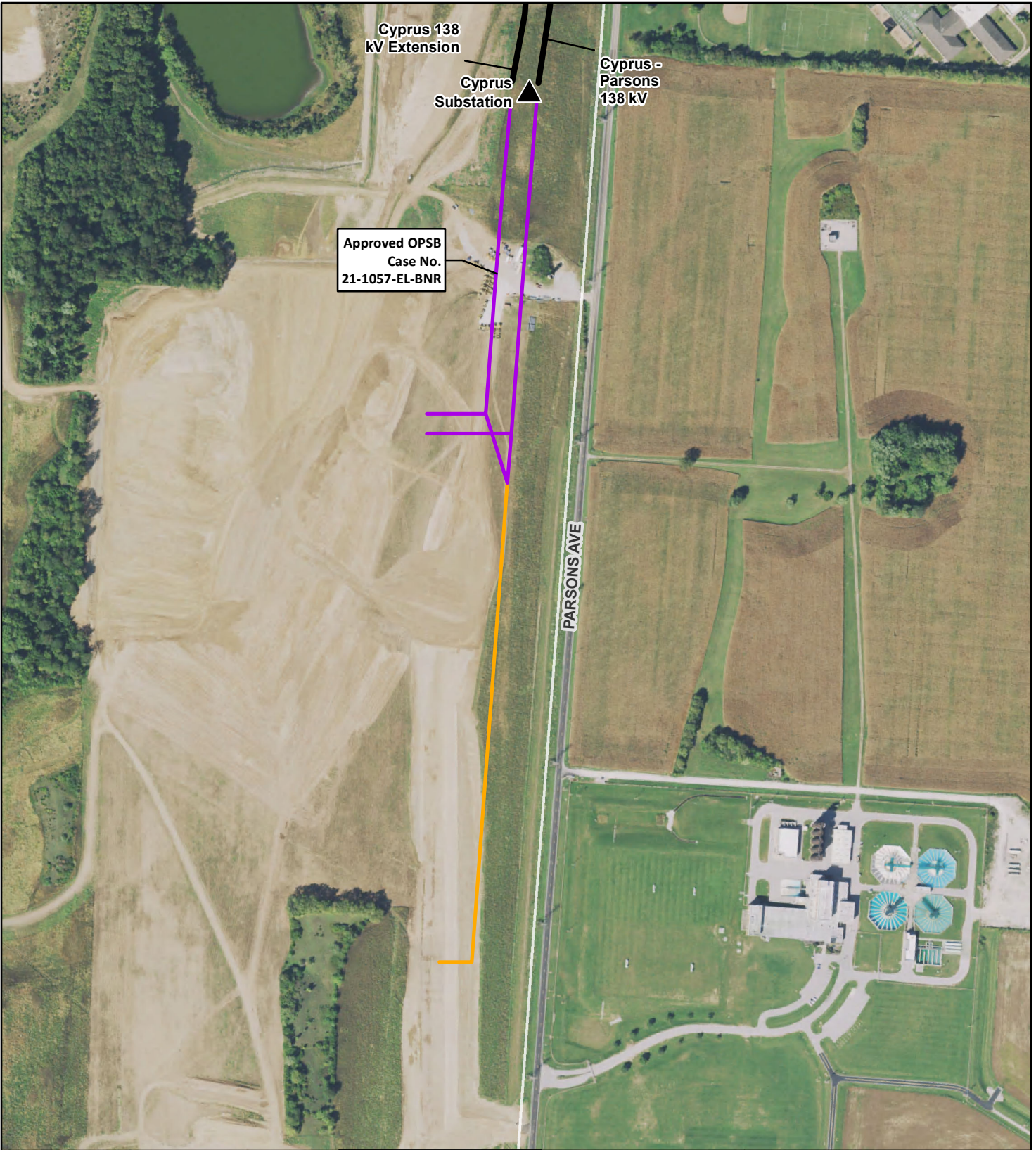


Map 1
Project Area

Hartman Farms 138 kV
Extension No. 6
Transmission Line Project

AEP OHIO

0 1,000 2,000 3,000 4,000
Feet

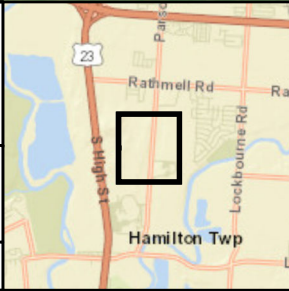


- ▲ Substation
- Existing Transmission Line
- Hartman Farms 138 kV Extension No. 5 and No. 6
- Proposed Hartman Farms 138 kV Extension No. 6
- ▭ Parcel Boundary

Sources:
NAIP Imagery (USDA 2022)

State Plane Ohio
South NAD 83

June 28, 2023



**Map 2
Aerial Map**

**Hartman Farms 138 kV
Extension No. 6
Transmission Line Project**

**AEP
OHIO**

0 250 500
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Feet

Appendix B PJM Solution



AEP Transmission Zone M-3 Process Cyprus

Need Number: AEP-2022-OH071

Process Stage: Solution Meeting 5/9/2023

Previously Presented: Need Meeting 10/14/2022

Project Driver: Customer Service

Specific Assumption Reference:

AEP Guidelines for Transmission Owner Identified Needs (AEP Assumptions Slide 13)

Problem Statement:

- A customer has requested additional 138 kV deliveries to their site in Columbus, Ohio near AEP's proposed Cyprus station (s2526).
- The initial peak demand at these new delivery points will be approximately 200 MW and the ultimate capacity of the customer will be up to 675 MW at the site.





AEP Transmission Zone M-3 Process South Columbus, OH

Need Number: AEP-2022-OH071

Process Stage: Solutions Meeting 5/9/2023

Proposed Solution:

The following work is all direct connect facilities to physically connect demand to the grid.

- **Cyprus 345/138 kV:** Cyprus is the station that was originally developed (s2526) to serve 675 MW of demand with room for 345 kV expansion based on LOA with the customer. Cut into the Beatty – Bixby 345 kV circuit and construct ~1.6 miles of double circuit line, utilizing 2-bundled ACSR Bittern 1272 conductor, SE rating 2278 MVA, to a new 345 kV ring bus at Cyprus station with (4) 5000 A, 63kA circuit breakers, (2) 345/138/34.5 kV, 675 MVA transformers, (12) 4000 A, 63kA, 138 kV circuit breakers, (1) 69.1 MVAR 138 kV Cap bank. Construct (2) 138 kV single circuit, ~0.4 miles, & (2) double circuit, ~0.9 miles, tie lines to the customers dead end structures utilizing ACSR Drake 795 (26/7) conductor SE 360 MVA. Modify the existing Cyprus 138kV Extension & Parsons 138kV circuits #1 & 2 structures to accommodate a fence relocation. Remote end relay upgrades are required at Beatty & Bixby 345 kV stations. Cost: **\$46.9 M**
- **Parsons 138 kV:** Install (1) 69.1 MVAR cap bank to resolve N-1-1 voltage issues. Cost: **\$2.0 M**

Appendix C Agency Correspondence



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate
Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

June 19, 2023

Philip Renner
WSP USA Inc.
312 Elm Street, Suite 2500
Cincinnati, Ohio 45202

Re: 23-0579; Cyprus to Customer Building #2B 138 kV Transmission Line

Project: The proposed project involves wetland delineation assessment and permitting in support of the rebuild of an approximately 200-foot-wide area along the proposed Cyprus to Customer Building #2B 138kV transmission line.

Location: The proposed project is located in Hamilton Township, Franklin County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following data within one mile of the project area:

Tippecanoe Darter (*Etheostoma tippecanoe*), SC
Fawnsfoot (*Truncilla donaciformis*), SC
Deertoe (*Truncilla truncata*), SC

The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened.

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

Location records for the species listed above are provided in a shapefile attachment to this letter. Species location information will not be published or distributed beyond the scope of the project description on the signed data request form.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The project is within the vicinity of records for the little brown bat (*Myotis lucifugus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree cutting inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible.

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED 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 the following listed mussel species.

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

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

State Threatened

pondhorn (*Uniomerus tetralasmus*)
Salamander Mussel (*Simpsonaias ambigua*)

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

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

State Endangered

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

State Threatened

lake chubsucker (*Erimyzon sucetta*)
paddlefish (*Polyodon spathula*)

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

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.

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

United States Department of the Interior



FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994



May 24, 2023

Re: Cyprus to Customer Building

Project Code: 2023-0082145

Dear Mr. Renner:

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 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 and/or northern long-eared 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. Please note that, because Indiana bat and/or northern long-eared bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

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, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

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

Sincerely,

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

Patrice Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Eileen Wyza, ODNR-DOW

Appendix D Wetland Delineation Report

HARTMAN FARMS 138 KV EXTENSION NO. 6 TRANSMISSION LINE PROJECT ENVIRONMENTAL SURVEY REPORT



PROJECT NO.: 31300107.156

DATE: JUNE 2023

AEP Transmission
8500 Smith's Mill Road
New Albany, OH 43054



An AEP Company

BOUNDLESS ENERGY™

WSP USA
312 ELM STREET, SUITE 2500
CINCINNATI, OH 45202



WSP.COM



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1 INTRODUCTION

On behalf of American Electric Power (AEP) Ohio Transmission Company, Inc. (AEP Ohio Transco), WSP USA (WSP) conducted environmental surveys for the proposed construction of the approximately 0.4-mile-long Hartman Farms 138 kV Extension No. 6 Transmission Line Project (“Project”), located in Hamilton Township, Franklin County, Ohio. The environmental survey included a wetland and water resource delineation and characterization of potential habitat for state and federally listed species. The wetland delineation was performed to determine whether wetlands and streams are present within the vicinity of the Project that would meet the definition of Waters of the United States (WoUS) or be subject to regulations implemented by the Ohio Environmental Protection Agency (OEPA), and to document their extents and current conditions if present. The wetland delineation was performed by individuals trained in the three-parameter methodology (hydrophytic vegetation, wetland hydrology, and hydric soils) adopted by the U.S. Army Corps of Engineers (USACE) as outlined in the USACE *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest, (Version 2.0)* (USACE, 2010) and in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987).

The report presents the results of the ecological considerations and review of the site’s existing and reasonably foreseeable site conditions at the time of the environmental surveys. The results cannot apply to site changes occurring after the survey which WSP has not had the opportunity to review. During the course of any survey, site conditions may change over time due to human and/or natural causes; as such, the results presented in this report may be invalidated, either wholly or in part, by changes beyond the control of WSP.



2 BACKGROUND INFORMATION

2.1 PROJECT AREA

The Project is located within Hamilton Township, Franklin County, Ohio. The 200-foot-wide, approximately 9.4-acre Environmental Survey Corridor (ESC) encompasses the proposed right-of-way (ROW) which originates at the northern terminus near approximate coordinate (39.8518°, -82.9912°), and extends generally south approximately 0.4 miles to the existing Customer Building #2B (39.8469°, -82.9921°), as shown in Figure 1 (Appendix A). The ESC is within the Lockbourne, Ohio U.S. Geological Survey (USGS) 7.5-minute topographic map quadrangle boundary. Table 2-1 provides an overview of the project location.

TABLE 2-1: GENERAL PROJECT INFORMATION

COUNTY:	Franklin
TOWNSHIP:	Hamilton
END POINT COORDINATES:	Northern Terminus: 39.8518°, -82.9912° Customer Building #2B: 39.8469°, -82.9921°
USGS QUADRANGLE:	Lockbourne, Ohio
ENVIRONMENTAL SURVEY CORRIDOR LENGTH (mi.):	0.4
ENVIRONMENTAL SURVEY CORRIDOR WIDTH (ft.):	200
ENVIRONMENTAL SURVEY CORRIDOR SIZE (ac.):	9.4
ELEVATION RANGE (ft. above sea level):	708 – 723
8-DIGIT HYDROLOGIC UNIT CODE:	05060001
12-DIGIT HYDROLOGIC UNIT CODE(S) :	05060001-23-03
DATE(S) OF SURVEY :	April 7, 2021, and May 25, 2023

2.1.1 DRAINAGE BASINS

All streams in the vicinity of the ESC drain to the Scioto River, which is a traditionally navigable waterway (TNW). The ESC is located within the Scioto drainage basin (HUC [hydrologic unit code] 05060001). The ESC lies within one 12-digit sub-watersheds, as outlined in Table 2-2 (USDA, 2019).

The OEPA 401 Water Quality Certification for the Nationwide Permits Web Mapping Application indicates that field-assessed streams within the ESC occur within watersheds that have been designated as “ineligible”. Stream impacts within watersheds denoted as “ineligible” will require either an individual Section 401 water quality certification (WQC) or director’s authorization from the OEPA (OEPA, 2020).



TABLE 2-2: 12-DIGIT HUC'S CROSSED BY THE PROJECT

8-DIGIT HUC CODE ¹	8-DIGIT HUC CODE NAME ¹	12-DIGIT HUC CODE ¹	12-DIGIT HUC NAME ¹	OHIO EPA SECTION 401 ELIGIBILITY ²
05060001	Scioto	05060001-23-03	Grant Run-Scioto River	Ineligible

¹Source: USDA, 2019

²Source: OEPA, 2020



3 METHODOLOGY

On April 7, 2021 and on May 25, 2023, a WSP ecologist traversed the ESC to conduct a wetland and waters delineation. The physical boundaries of aquatic resources were recorded using a Trimble Global Positioning System (GPS) unit rated for sub-decimeter accuracy. The GPS data was then geo-corrected using Trimble GPS Pathfinder Office software (version 5.60) and reviewed for quality control.

Prior to conducting field surveys, WSP ecologists completed a desktop review by analyzing several federal and state documents for the presence of wetland and streams. This review included Natural Resources Conservation Service (NRCS) soil survey data, U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps of Ohio, USGS 7.5-minute topographic maps, and USGS National Hydrography Dataset (NHD) stream and river data as an exercise to identify the occurrence and location of potential wetlands and streams.

3.1 WETLAND AND STREAM DELINEATION

3.1.1 WETLAND DELINEATION

The USACE and the U.S. Environmental Protection Agency (USEPA) define wetlands as areas inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions (33 CFR, Part 328.3).

Wetlands were delineated according to Section 404 of the Clean Water Act, Technical Report Y-87-1 *Corps of Engineers Wetlands Delineation Manual ('87 Manual)* (Environmental Laboratory, 1987), and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest, (Version 2.0) (Regional Supplement)* (USACE, 2010). Representative data points were collected for wetlands and corresponding, adjacent upland areas. Wetland data was recorded on the USACE *Regional Supplement Wetland Determination Data Forms*.

Wetland vegetation communities were classified according to the *Classification of Wetlands and Deepwater Habitats of the United States*, commonly referred to as the Cowardin Classification System (Cowardin et al., 1979). Wetlands within the ESC were assessed using the OEPA *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) to determine the ecological quality and level of disturbance (Mack, 2001).

3.1.2 STREAM DELINEATION AND ASSESSMENT

Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high water mark (OHWM). The OHWM is defined in the USACE *Regulatory Guidance Letter No. 05-05* (USACE, 2005). Generally, the OHWM is identified by a clearly defined, natural line along the stream bank created by fluctuations and flow of water; this may include changes in contours, substrate, vegetation, and debris (USACE, 2005).

Stream assessments were conducted using the methods described in the OEPA's Methods for Assessing Habitat in Flowing Waters: Using OEPA's *Qualitative Habitat Evaluation Index* (Rankin, 2006) and *Field Evaluation Manual for Ohio's Primary Headwater Habitat Streams, Version 3* (Davic, 2012).



4 RESULTS

A WSP ecologist surveyed the ESC on April 7, 2021 and on May 25, 2023 by walking the approximately 0.4-mile-long ESC and evaluating for wetlands and other WoUS. No wetlands, streams, or freshwater ponds were identified within the ESC. The lack of identified water resources are depicted on the Delineated Features Map (Figure 3, Appendix A).

4.1 DESKTOP REVIEW

4.1.1 SOILS EVALUATION

According to the NRCS Soil Data for Franklin County, Ohio, there are six soil map units shown within the ESC, as presented in Table 4-1. The soils observed by the WSP ecologists during the environmental survey of the ESC were consistent with the NRCS soil survey mapping.

TABLE 4-1: SOIL UNITS MAPPED WITHIN THE ESC

SOIL UNIT SYMBOL	SOIL UNIT NAME	PERCENT HYDRIC	HYDRIC RATING ¹	AREA WITHIN ESC (ac.)
EIB	Eldean silt loam, 2 to 6 percent slopes	0	Non-Hydric	2.6
EIC2	Eldean silt loam, 6 to 12 percent slopes, eroded	0	Non-Hydric	<0.1
EID2	Eldean silt loam, 12 to 18 percent slopes, eroded	0	Non-Hydric	3.1
OcB	Ockley silt loam, Southern Ohio Till Plain, 2 to 6 percent slopes	0	Non-Hydric	0.3
SIA	Sleeth silt loam, Southern Ohio Till Plain, 0 to 2 percent slopes	5	Predominantly Non-Hydric	0.8
WdA	Warsaw silt loam, 0 to 2 percent slopes	0	Non-Hydric	2.6

Total Area of Non-Hydric Soils 8.6

Total Area of Predominantly Non-Hydric Soils 0.8

¹Non-Hydric = 0% hydric soil component; Predominantly Non-Hydric = 1-32%; Partially Hydric =33-65%; Predominantly Hydric = 66-99%; and All Hydric = 100%. Source: Soil Survey Staff, NRCS. Web Soil Survey.

4.1.2 NATIONAL WETLAND INVENTORY REVIEW

According to the NWI maps of the Lockbourne, Ohio quadrangle, there are no mapped NWI features within the approximately 9.4-acre ESC. The locations of mapped NWI features in the vicinity of the ESC are shown on Figure 2 (Appendix A).

4.1.3 FEMA FLOODPLAIN REVIEW

According to Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, there are no mapped 100-year floodplains or regulated floodways within the ESC, as shown on Figure 2 (Appendix A).



4.2 DELINEATED WETLANDS

The WSP ecologist did not identify any wetlands within the ESC during the environmental surveys. Figure 3 (Appendix A) displays the lack of water resources delineated within the ESC. Representative photographs of the ESC are provided in Appendix E.

4.3 STREAMS AND RIVERS

The WSP ecologist did not identify any streams within the ESC during the environmental surveys. Figure 3 (Appendix A) displays the lack of water resources delineated within the ESC. Representative photographs of the ESC are provided in Appendix E.

4.4 PONDS AND OPEN WATER

The WSP ecologist did not identify any ponds or open water features within the ESC during the environmental surveys. Figure 3 (Appendix A) displays the lack of water resources delineated within the ESC. Representative photographs of the ESC are provided in Appendix E.

4.5 VEGETATIVE COMMUNITIES

The WSP ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys. A breakdown of land uses and vegetated land cover identified within the ESC is provided, overlain on aerial photography in Figure 4 (Appendix A). The ESC is entirely composed of developed, high intensity land use or areas that are actively under construction. It should be noted that development of the ESC occurred after the date of the aerial photograph used in the attached figures. Therefore, the conditions displayed in the aerial imagery are not necessarily indicative of current site conditions.



TABLE 4-2: VEGETATIVE COMMUNITIES WITHIN THE ESC

VEGETATIVE COMMUNITY	DESCRIPTION	ACREAGE WITHIN THE ESC	PERCENTAGE OF ESC
Developed, High Intensity	The entirety of the ESC was under active construction at the time of the environmental survey on May 25, 2023, with generally disturbed vegetation and large areas devoid of vegetation.	9.4	100.0%
Total		9.4	100%

4.6 THREATENED AND ENDANGERED SPECIES COORDINATION

4.6.1 USFWS COORDINATION

A request for review was submitted to the USFWS on May 16, 2023. In an email dated May 24, 2023 the USFWS provided comments on the Project with regard to federally-listed threatened and endangered species within the Project vicinity. The USFWS indicated that there are no federal wildlife refuges, wilderness areas, or critical habitat within the vicinity of the Project. Comments from USFWS regarding protected species are provided in Table 4-3. The USFWS review comments have been included in Appendix F.

USFWS comments indicate that the ESC lies within the range of the Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*). The USFWS recommended seasonal tree clearing dates of October 1st – March 31st in order to avoid impacts to these species.

The USFWS indicated that “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.”

4.6.2 ODNR COORDINATION

A request for Environmental Review was submitted to the ODNR on May 16, 2023. The ODNR Environmental Review was received on June 19, 2023. An addendum discussing potential impacts to state-listed species will be provided once the environmental review has been received.

ODNR comments indicated that the ESC lies within the range of the Indiana bat, northern long-eared bat, little brown bat (*Myotis lucifugus*), and tricolored bat (*Perimyotis subflavus*) and in the vicinity of records for the little brown bat. ODNR recommended seasonal tree clearing dates of October 1st – March 31st in order to avoid impacts to these species. In addition, ODNR recommended that a desktop habitat assessment be conducted to identify potential hibernaculum within a 0.25-mile radius of the ESC.

- Based on the protocols identified in the *Range-Wide Indiana Bat & Northern Long-Eared Bat Survey Guidelines* (USFWS 2022) and the *Ohio Division of Wildlife and U.S. Fish and Wildlife Service (OH-Field Office) Joint Guidance for Bat Surveys and Tree Clearing* (ODNR/USFWS 2022) WSP performed a desktop



review for potential hibernacula within the vicinity of the Project. Topographic maps did not depict caves, cliffs/ledges, or karst topography within a 0.25-mile radius of the ESC. A review of aerial imagery also did not provide evidence of these habitat types. No potential hibernacula were identified within the ESC during the environmental survey. Suitable summer habitat was also not identified within the ESC, which is entirely free of forested habitat or trees large enough to provide summer roost habitat. However, any tree trimming/clearing will occur within the recommended clearing window (October 1st – March 31st) to avoid any unforeseen impacts to these species or their habitat. Therefore, no presence/absence surveys are required and no impacts to state- and/or federally-listed bat species are anticipated. If any tree clearing will occur outside the recommended clearing window appropriate coordination with USFWS and ODNR will occur to seek permission for out of season tree clearing. Additional information pertaining to the state- and federally-listed bat species is provided in Table 4-3.



TABLE 4-3: LISTED SPECIES COMMENTED ON BY ODNR AND USFWS

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	WSP IMPACT ASSESSMENT
Mammals						
Indiana bat (<i>Myotis sodalis</i>)	Endangered	Endangered	<p>Winter hibernacula are provided by caves and mines. Summer roost habitat typically includes live or dead trees with exfoliating bark, crevices, or cavities that can be used for roosting. Open sub-canopy areas and flight corridors are important to allow maneuvering during foraging. Proximity to water sources provides a greater density of insect prey.</p>	No	<p>USFWS comments recommended seasonal tree clearing dates (October 1 through March 31) to avoid impacts protected bat species.</p>	<p>Suitable summer habitat was not identified within the ESC. Therefore, no impacts to these species or their habitat is anticipated to occur.</p>
northern long-eared bat (<i>Myotis septentrionalis</i>)	Threatened	Threatened				
little brown bat (<i>Myotis lucifugus</i>)	Endangered	Not Listed				
tri-colored bat (<i>Perimyotis subflavus</i>)	Endangered	Not Listed				
Fish						
goldeye (<i>Hiodon alosoides</i>)	Endangered	Not Listed	It prefers turbid slower-moving waters of lakes and rivers.	No	<p>ODNR has recommended in-water work restriction dates of March 15th to June 30th in perennial streams. If not in-water work is proposed in perennial streams, the Project is not likely to impact this species.</p>	<p>No in-water work is proposed in a perennial stream; therefore, project is not likely to impact this or other aquatic species.</p>
Iowa darter (<i>Etheostoma exile</i>)	Endangered	Not Listed	Occurs in clear to lightly turbid water in small cool lakes, bogs, ponds, and in slow-moving waters of small brooks to medium rivers. Primarily associated with submerged vegetation.	No		



TABLE 4-3: LISTED SPECIES COMMENTED ON BY ODNR AND USFWS

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	WSP IMPACT ASSESSMENT
popeye shiner (<i>Notropis ariommus</i>)	Endangered	Not Listed	Primarily inhabits slowly or moderately flowing rivers or creeks.	No	ODNR has recommended in-water work restriction dates of March 15 th to June 30 th in perennial streams. If not in-water work is proposed in perennial streams, the Project is not likely to impact this species.	No in-water work is proposed in a perennial stream; therefore, project is not likely to impact this or other aquatic species.
northern brook lamprey (<i>Ichthyomyzon fossor</i>)	Endangered	Not Listed	They are typically found in the headwaters of streams that are moderately warm and clean.	No		
spotted darter (<i>Etheostoma maculatum</i>)	Endangered	Not Listed	Occur in freshwater rivers marked with the presence of boulders and other rocks.	No		
shortnose gar (<i>Lepisosteus platostomus</i>)	Endangered	Not Listed	Habitat includes lakes, swamps, and the calm pools and backwaters of creeks and rivers. They are commonly found near vegetation and submerged logs.	No		
tonguetied minnow (<i>Exoglossum laurae</i>)	Endangered	Not Listed	Unable to live in murky waters and requires a clean rock river bottom, typically cool waters within forested banks of large rivers.	No		
lake chubsucker (<i>Erimyzon sucetta</i>)	Threatened	Not Listed	Wetlands, ponds, and floodplain lakes with still water and low turbidity.	No		
paddlefish (<i>Polyodon spathula</i>)	Threatened	Not Listed	Typically found in deep water of large river basins and their tributaries.	No		



TABLE 4-3: LISTED SPECIES COMMENTED ON BY ODNR AND USFWS

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	WSP IMPACT ASSESSMENT
Freshwater Mussels						
clubshell (<i>Pleurobema clava</i>)	Endangered	Endangered	Habitat is typically provided by streams and small rivers with well-oxygenated riffles and sand and gravel substrates.	No	In-water work in streams with a drainage area >5 mi ² at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, project is not likely to impact this or other aquatic species.
rayed bean (<i>Villosa fabalis</i>)	Endangered	Endangered	Habitat is typically provided in small rivers and streams with aquatic vegetation and sand/gravel substrates.	No		
northern riffleshell (<i>Epioblasma torulosa rangiana</i>)	Endangered	Endangered	Habitat is typically provided by large streams and small rivers in firm sand of riffle areas.	No		
snuffbox (<i>Epioblasma triquetra</i>)	Endangered	Endangered	Typically found in small to medium-sized creeks and some larger rivers, in areas with a swift current.	No		
purple cat's paw (<i>Epioblasma obliquata obliquata</i>)	Endangered	Endangered	Medium to large rivers with swift currents. Typically found in shallow areas.	No		
rabbitsfoot (<i>Quadrula cylindrica cylindrica</i>)	Threatened	Endangered	Slow-moving waters with sand and gravel substrates.	No		
elephant-ear (<i>Elliptio crassidens crassidens</i>)	Endangered	Not Listed	Primarily inhabits large rivers in mud, sand or fine gravel.	No		
long solid (<i>Fusconaia maculata maculate</i>)	Endangered	Not Listed	Typically, found in small to large rivers in gravel with a strong current.	No		
Ohio pigtoe (<i>Pleurobema cordatum</i>)	Endangered	Not Listed	Commonly found in strong currents on substrates of sand and gravel.	No		
pocketbook (<i>Lampsilis ovata</i>)	Endangered	Not Listed	Creeks to large rivers with quiet to swift current in gravel, sand and cobble — nearly any substrate except for moving sand.	No		



TABLE 4-3: LISTED SPECIES COMMENTED ON BY ODNR AND USFWS

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	WSP IMPACT ASSESSMENT
washboard (<i>Megaloniaias nervosa</i>)	Endangered	Not Listed	Typically, a large river species, inhabiting the main channel areas of a stream. Suitable habitat consists of slow current areas with substrates composed of sand, gravel, or mud.	No	In-water work in streams with a drainage area >5 mi ² at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, project is not likely to impact this or other aquatic species.
pondhorn (<i>Unio merus tetralasmus</i>)	Threatened	Not Listed	This species is typically found in ponds, small creeks, and headwater streams with sand or mud substrates.	No		



5 SUMMARY

WSP conducted environmental surveys of the proposed approximately 0.4-mile-long Hartman Farms 138 kV Extension No. 6 Transmission Line Project April 7, 2021 and on May 25, 2023. No wetlands, streams, or ponds were delineated by the WSP ecologist within the 9.4-acre ESC.

Coordination with the USFWS and ODNR indicated that the Project is within the range of the Indiana bat, northern long-eared bat, little brown bat, and tricolored bat. USFWS and ODNR recommended that all tree clearing occur within the recommended clearing window (October 1st – March 31st), to avoid any impacts to these species or their habitat. However, no trees or forested areas were identified within the ESC during the environmental survey, and therefore the Project area is not expected to provide habitat for state- or federally-protected bat species. Topographic maps did not depict caves, cliffs/ledges, and subsurface mines within a three-mile radius of the ESC. A review of aerial imagery also did not provide evidence of these habitat types. Documented mines or mine openings are not recorded within a three mile buffer of the Project Area. Additionally, no potential hibernacula were identified within the ESC during the field survey.

It is anticipated that in-water work is not necessary, therefore no mussel surveys or construction timing windows are necessary related to protected fish species.

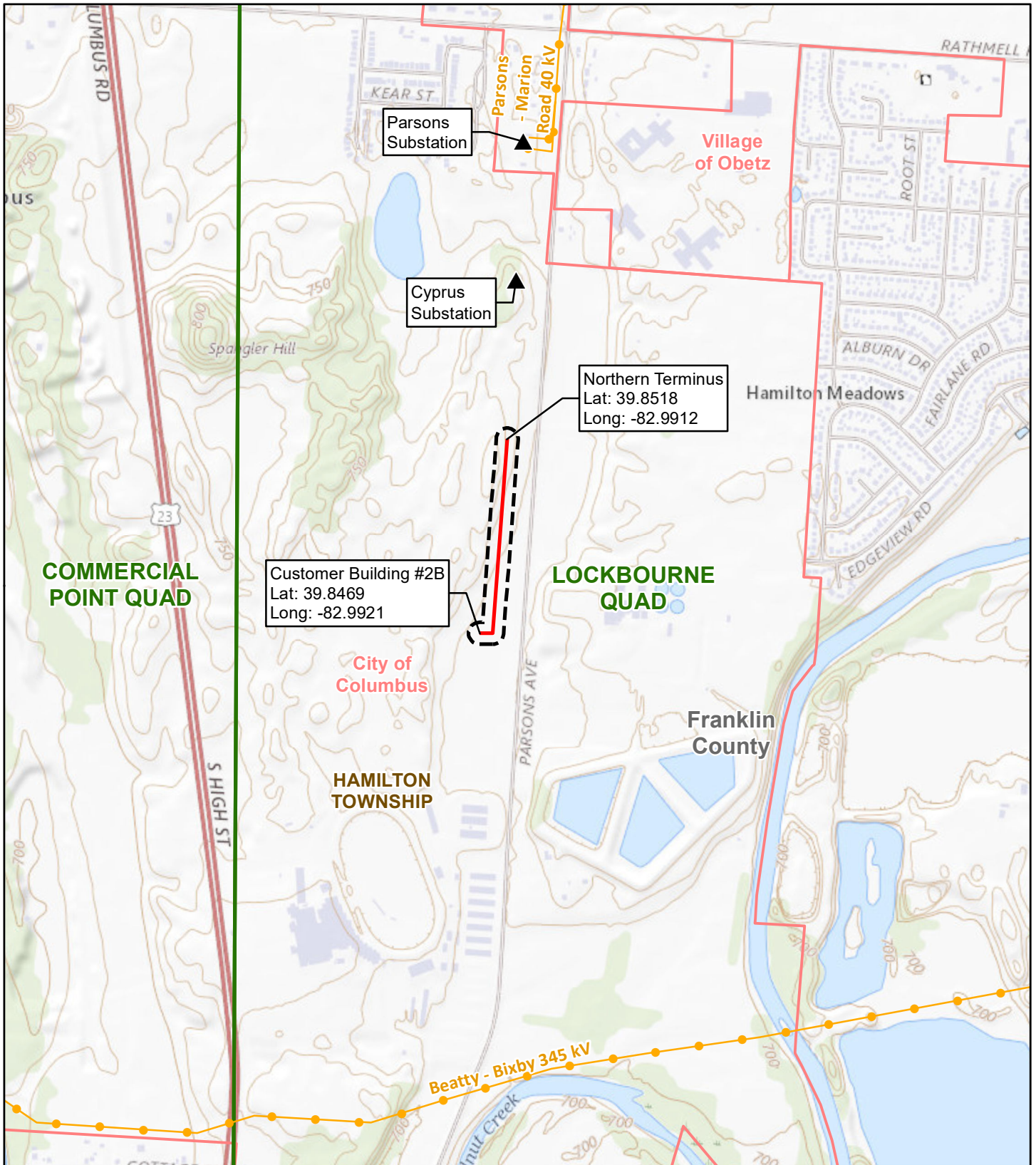


6 REFERENCES

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APPENDIX

A FIGURES

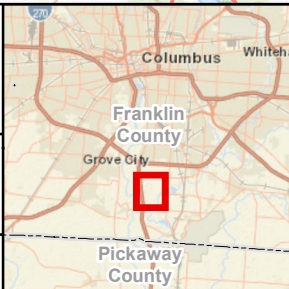


- ▲ Existing Substation
- Existing Transmission
- Hartman Farms 138kV Extension No. 6
- - - Environmental Survey Corridor
- ▭ USGS 24k Topo Quad Boundary
- ▭ Municipal Boundary
- ▭ Township Boundary
- ▭ County Boundary

Sources:
Topo (USGS)
Quad Boundaries (USGS)

Coordinate System:
State Plane Ohio South
NAD 1983

June 27, 2023



Hartman Farms 138kV Extension No. 6
Transmission Line Project

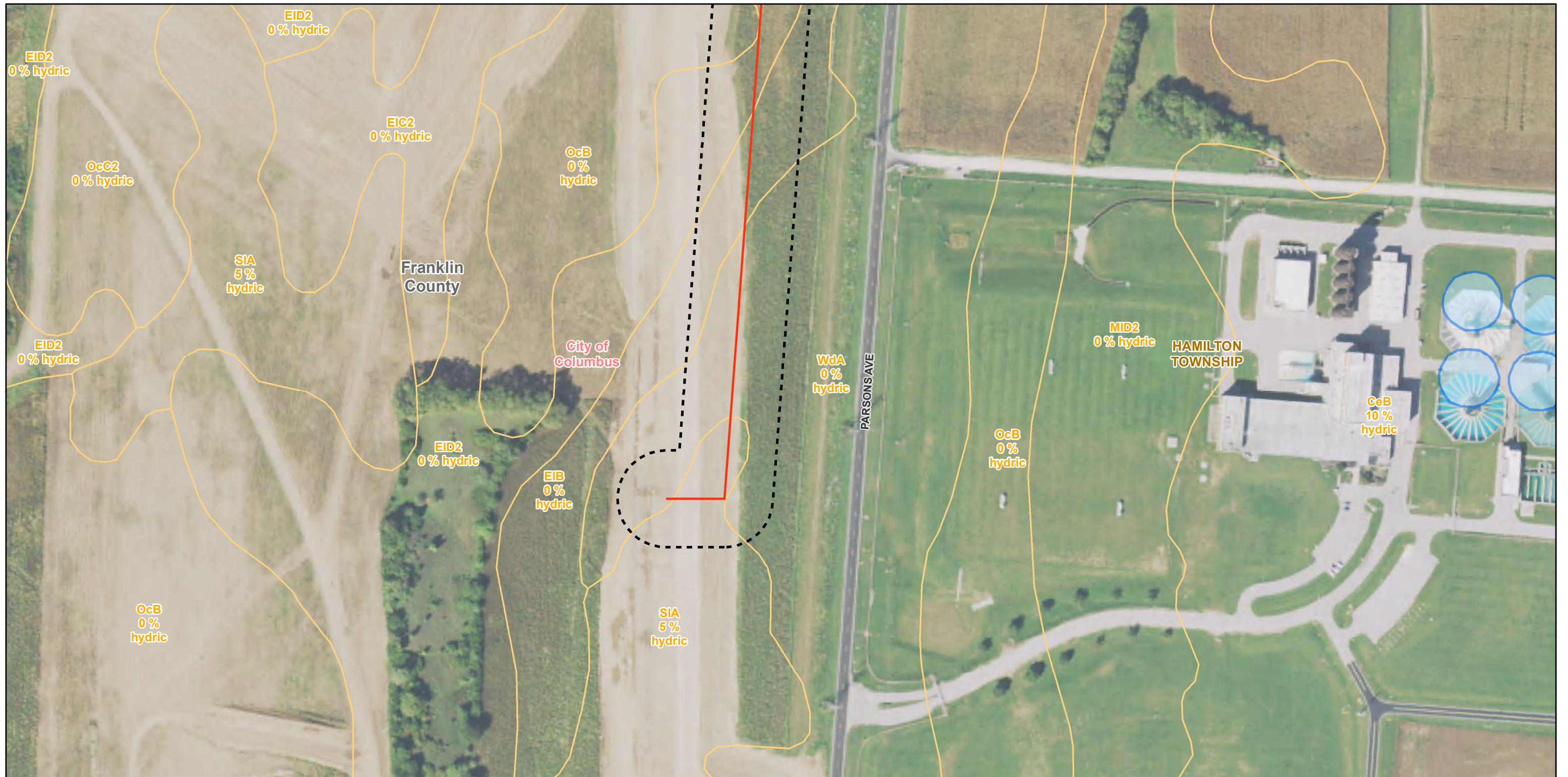
Figure 1. Project Location Map

0 500 1,000 Feet

N



<ul style="list-style-type: none"> — Hartman Farms 138 kV Extension No. 6 Environmental Survey Corridor Soil Map Unit Municipal Boundary Township Boundary County Boundary 	<p>Sources: 2021 NAIP Imagery (USDA) Wetland (USFWS) Hydrography (USGS) Soil Units (USDA) Floodplains (FEMA)</p>		<p>HARTMAN FARMS 138 KV EXTENSION NO. 6 TRANSMISSION LINE PROJECT</p>
<p>Coordinate System: State Plane Ohio South NAD 1983</p>	<p>Figure 2. Environmental Basemap</p>		
<p>June 14, 2023</p>	<div style="display: flex; align-items: center;"> <div style="margin-right: 20px;"> </div> <div style="margin-right: 20px;"> </div> <div style="text-align: center;"> <p>N</p> </div> <div style="margin-left: 20px;"> <p>0 200 400 Feet</p> </div> </div>		



	Hartman Farms 138 kV Extension No. 6
	Environmental Survey Corridor
	NHD Waterbody
	Soil Map Unit
	Municipal Boundary
	Township Boundary
	County Boundary

Sources:
 2021 NAIP Imagery (USDA)
 Wetland (USFWS)
 Hydrography (USGS)
 Soil Units (USDA)
 Floodplains (FEMA)

Coordinate System:
 State Plane Ohio South
 NAD 1983

June 14, 2023



HARTMAN FARMS 138 KV EXTENSION NO. 6
 TRANSMISSION LINE PROJECT
Figure 2. Environmental Basemap



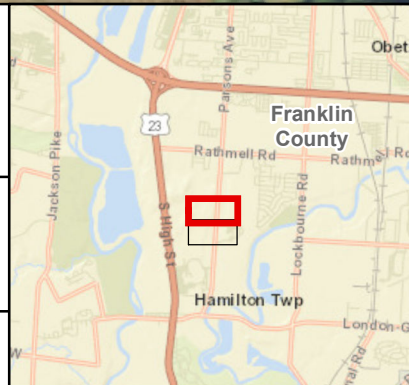
Hartman Farms 138 kV Extension No. 6
Environmental Survey Corridor
Municipal Boundary
Township Boundary
County Boundary

*No delineated features are within the current map extent.

Sources:
2021 NAIP Imagery (USDA)



Coordinate System:
Ohio State Plane South
NAD 1983


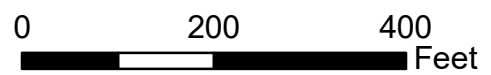
June 14, 2023



HARTMAN FARMS 138 KV EXTENSION NO. 6
TRANSMISSION LINE PROJECT

Figure 3. Delineated Features



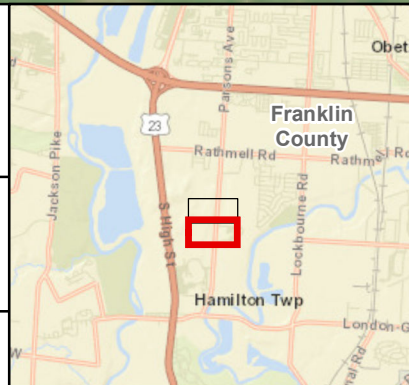
— Hartman Farms 138 kV Extension No. 6
 Environmental Survey Corridor
 Municipal Boundary
 Township Boundary
 County Boundary

*No delineated features are within the current map extent.



Sources:
2021 NAIP Imagery (USDA)

Coordinate System:
Ohio State Plane South
NAD 1983


June 14, 2023



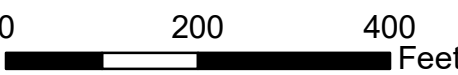
**HARTMAN FARMS 138 KV EXTENSION NO. 6
 TRANSMISSION LINE PROJECT**
Figure 3. Delineated Features

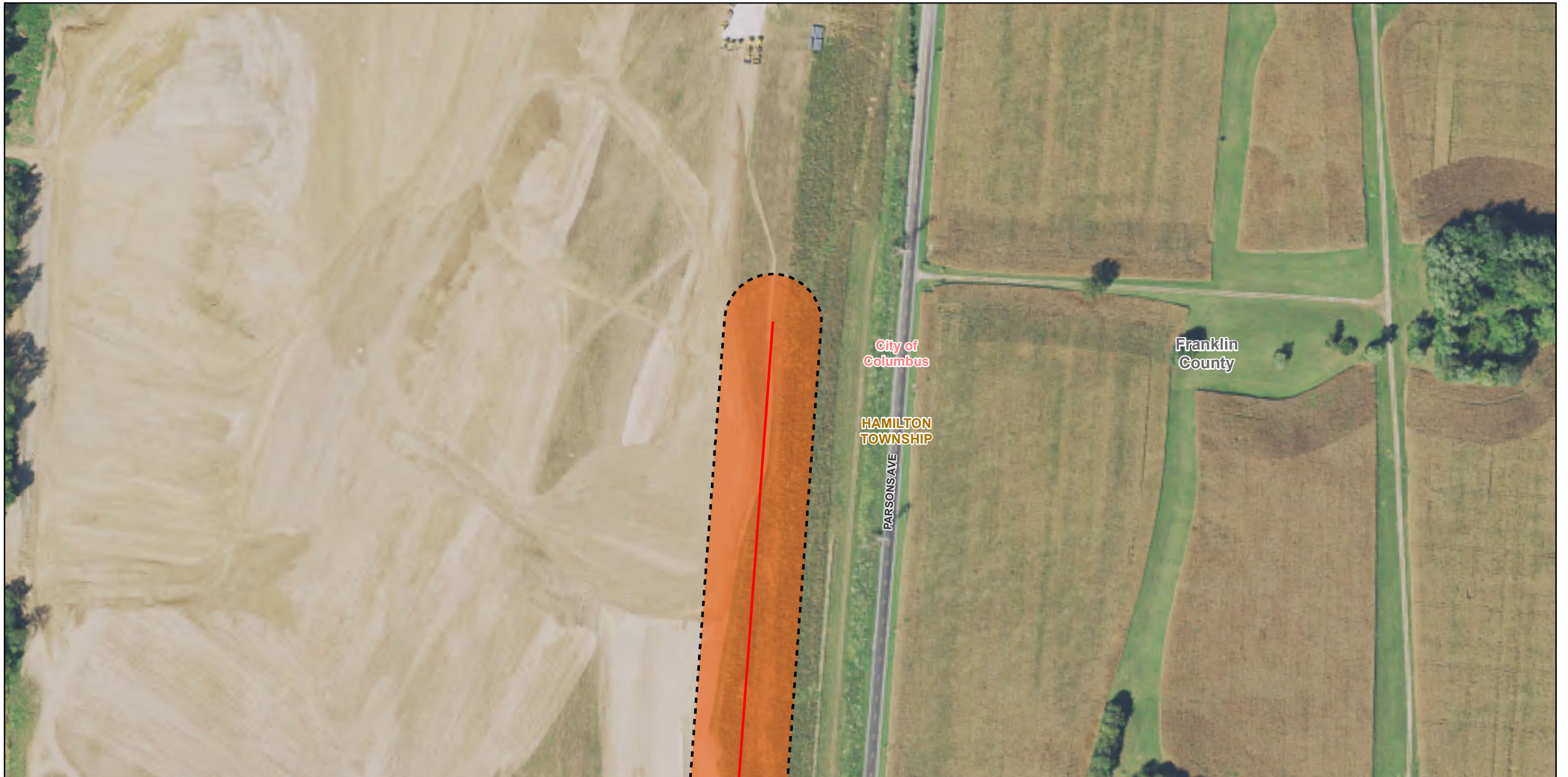
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0 200 400



Feet



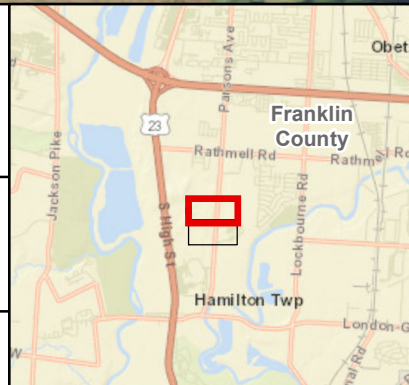
Hartman Farms 138 kV Extension No. 6
Environmental Survey Corridor
Municipal Boundary
Township Boundary
County Boundary
Developed, High Intensity

*No delineated features are within the current map extent.

Sources:
2021 NAIP Imagery (USDA)

Coordinate System:
Ohio State Plane South
NAD 1983

June 27, 2023

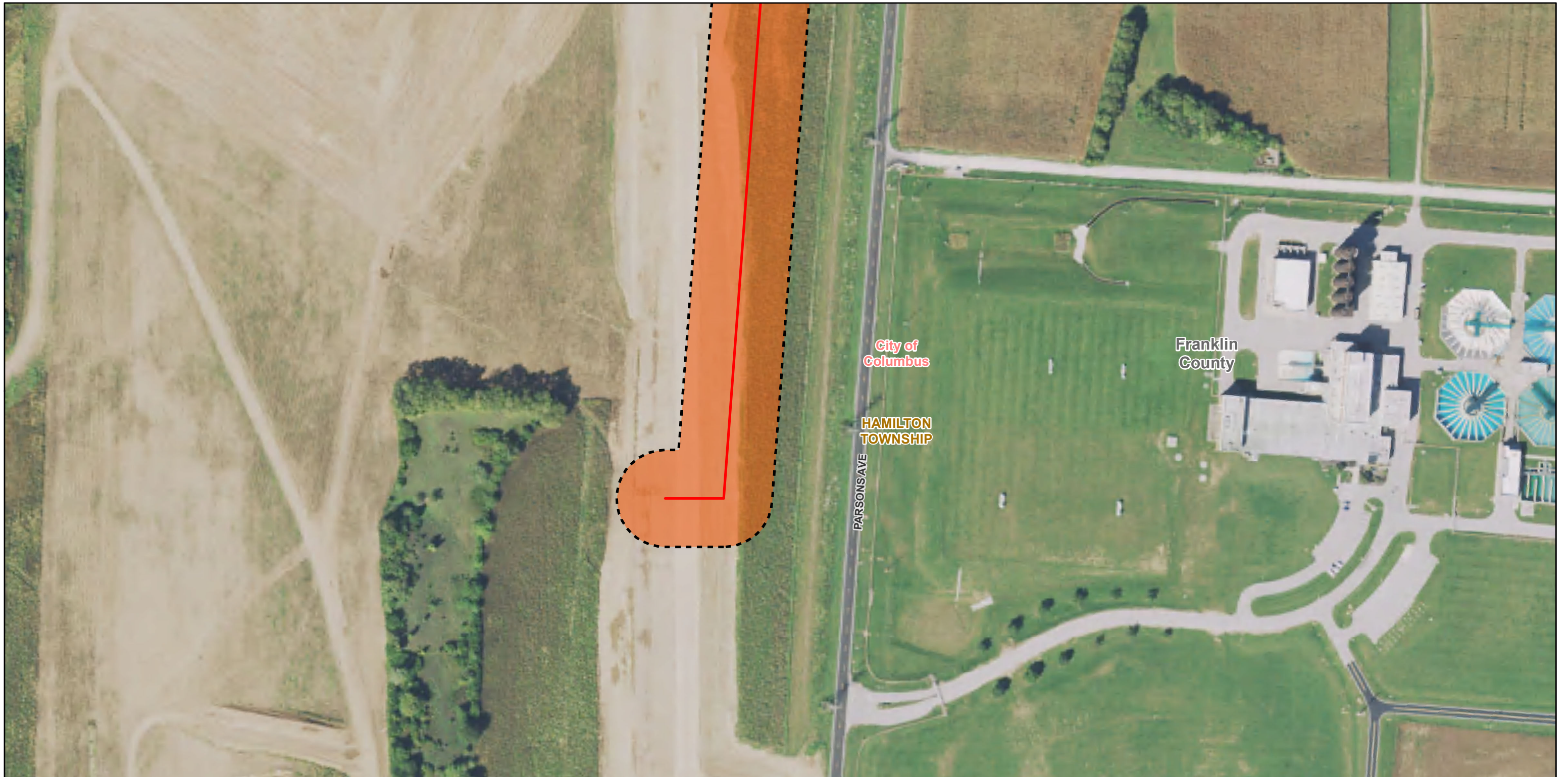


HARTMAN FARMS 138 KV EXTENSION NO. 6
TRANSMISSION LINE PROJECT

Figure 3. Vegetation Coverage

0 200 400

Feet



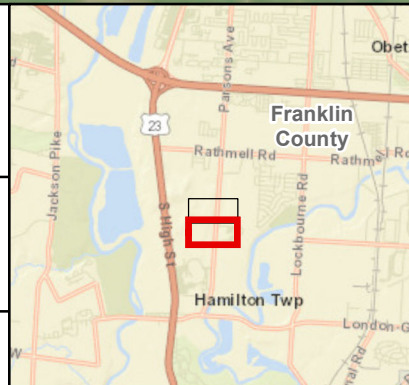
	Hartman Farms 138 kV Extension No. 6
	Environmental Survey Corridor
	Municipal Boundary
	Township Boundary
	County Boundary
	Developed, High Intensity

*No delineated features are within the current map extent.

Sources:
2021 NAIP Imagery (USDA)

Coordinate System:
Ohio State Plane South
NAD 1983

June 27, 2023



HARTMAN FARMS 138 KV EXTENSION NO. 6
TRANSMISSION LINE PROJECT

Figure 3. Vegetation Coverage

APPENDIX

B REPRESENTATIVE PHOTOGRAPHS

HARTMAN FARMS 138 KV EXTENSION NO. 6 TRANSMISSION LINE PROJECT

PHOTOGRAPH 1



Representative view of the ESC, facing south during the April 7, 2021 environmental survey.

PHOTOGRAPH 2



Representative view of the ESC, facing east during the April 7, 2021 environmental survey.

HARTMAN FARMS 138 KV EXTENSION NO. 6 TRANSMISSION LINE PROJECT

PHOTOGRAPH 3



Representative view of the ESC, facing north during the May 25, 2023 environmental survey.

PHOTOGRAPH 4

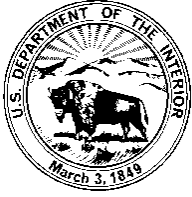


Representative view of the ESC, facing west during the May 25, 2023 environmental survey.

APPENDIX

C AGENCY COORDINATION

United States Department of the Interior



FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994



May 24, 2023

Re: Cyprus to Customer Building

Project Code: 2023-0082145

Dear Mr. Renner:

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 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 and/or northern long-eared 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. Please note that, because Indiana bat and/or northern long-eared bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

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, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice Ashfield". The signature is fluid and cursive, with the first name "Patrice" and last name "Ashfield" clearly distinguishable.

Patrice Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Eileen Wyza, ODNR-DOW



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate
Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

June 19, 2023

Philip Renner
WSP USA Inc.
312 Elm Street, Suite 2500
Cincinnati, Ohio 45202

Re: 23-0579; Cyprus to Customer Building #2B 138 kV Transmission Line

Project: The proposed project involves wetland delineation assessment and permitting in support of the rebuild of an approximately 200-foot-wide area along the proposed Cyprus to Customer Building #2B 138kV transmission line.

Location: The proposed project is located in Hamilton Township, Franklin County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following data within one mile of the project area:

Tippecanoe Darter (*Etheostoma tippecanoe*), SC
Fawnsfoot (*Truncilla donaciformis*), SC
Deertoe (*Truncilla truncata*), SC

The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened.

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

Location records for the species listed above are provided in a shapefile attachment to this letter. Species location information will not be published or distributed beyond the scope of the project description on the signed data request form.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The project is within the vicinity of records for the little brown bat (*Myotis lucifugus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree cutting inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible.

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED 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 the following listed mussel species.

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

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

State Threatened

pondhorn (*Uniomerus tetralasmus*)
Salamander Mussel (*Simpsonaias ambigua*)

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

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

State Endangered

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

State Threatened

lake chubsucker (*Erimyzon sucetta*)
paddlefish (*Polyodon spathula*)

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

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.

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
6/30/2023 2:19:36 PM**

in

Case No(s). 23-0705-EL-BNR

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