Construction Notice for the Hillsboro-Millbrook Park 138 kV Line Adjustment 2 Project

AEP OHIO TRANSMISSION COMPANY

An AEP Company

BOUNDLESS ENERGY

PUCO Case No. 23-0564-EL-BNR

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

Submitted by:
AEP Ohio Transmission Company, Inc.

May 30, 2023

Construction Notice

AEP Ohio Transmission Company, Inc. Hillsboro-Millbrook Park 138 kV Line Adjustment 2 Project

4906-6-05

AEP Ohio Transmission Company, Inc. (the "Company") is providing the following information to the Ohio Power Siting Board ("OPSB") in accordance with the accelerated application requirements of Ohio Administrative Code ("OAC") Section 4906-6-05.

4906-6-05(B) General Information

B(1) Project Description

The applicant shall provide 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 or Construction Notice application.

The Company is proposing the Hillsboro–Millbrook Park 138 kV Line Adjustment 2 Project (the "Project"), located in Scioto County, Ohio. The Project involves adjusting two transmission line structures on the approved Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project (approved in Case No. 21-0268-EL-BLN). The adjustments are necessary for improved construction access and transmission line operations for the specific section of the transmission line. Exhibit 1 in Appendix A shows the location of the Project in relation to the surrounding vicinity.

The Project meets the requirements for a Construction Notification ("CN") because it is within the types of projects defined by Item (1)(a) of 4906-1-01 ***Appendix A Application Requirement Matrix For Electric Power Transmission Lines*** which states:

> (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:
>
> (a) Line(s) not greater than 0.2 miles in length.

The Project has been assigned PUCO Case No. 23-0564-EL-BNR.

B(2) Statement of Need

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

The Project involves an adjustment to the approved alignment. A proposed adjustment to two structures is needed to improve safe access during construction and operations due to safety concerns associated with a soil slip area near the originally planned structure location. The need of the overall rebuild Project remains the same as was reported in OPSB Case Number 21-0268-El-BLN.

The Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project involves rebuilding approximately 52 miles of 138 kilovolt (kV) line between Ohio Power Company's Hillsboro and Millbrook Park stations, as a single circuit line. Currently, the Hillsboro–Millbrook Park 138 kV circuit is configured as two separate wood pole lines, six wired together. Fifty percent of the structures are original vintage from 1943 and the remaining structures were replaced between 1960 and 1980. The majority (93 percent) of the original conductor built in 1944 and 1948 is still in service. This line has significant asset renewal concerns, which includes 1342 open conditions on the line. These conditions include numerous pole, shielding, and grounding issues throughout the line.

South Central Power's Sinking Springs delivery point is served from this line and has experienced over 3.5 million Customer Minutes of Interruption over the past 5 years. Sinking Springs serves approximately 1,500 customers with 4.6 megavolt amperes ("MVA") of peak load. Retiring the existing line is not viable as this line serves as an interconnection to Dayton Power & Light ("DPL") zone and provides service to DP&L and Duke Energy Ohio ("Duke"). In Addition, there have also been numerous independent power producer ("IPP") requests to interconnect in the area. Without the Project, customer minutes of interruptions will continue to get worse as the line asset deteriorates.

The need and solution for the Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project was presented to PJM on 5/20/2019 and 2/21/2020, then subsequently assigned a PJM# of s2201. This Project was included in the 2022 Long-Term Forecast Report on page 42 of 111, which is included as Appendix B.

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 Line Adjustment 2 is part of the Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project and is located in Scioto County, Ohio. The Project proposes to shift structure 274 (to approximately 38.870628 latitude, -83.023738 longitude) and structure 273 (to approximately 38.871197 latitude, -83.024868 longitude) which are located west of State Route OH-104 and south of OH 348 near the Scioto River.

Exhibit 2 in Appendix A shows the proposed Project relative to existing transmission facilities on a U.S. Geological Survey ("USGS") topographic quadrangle map. Exhibit 3 in Appendix A identifies the Project components (the two structures proposed for a shift in location) on aerial imagery.

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 adjustment to two structures is the result of the need to shift structure 274 more than 10 feet north of the approved centerline for improved construction access due to safety concerns associated with a nearby soil slip area (east of structure 274's previously proposed location). Additionally, the shift of structure 274 will necessitate a shift of structure 273 (to the east and on the approved centerline). No alternatives were considered due to the nature of the soil slip area and the associated safety concerns. The shift of the two structures will not impact any streams, wetlands, or cultural resource sites. Additionally,

there is no change to the tree clearing plan in this section due to shifting the two structures. Refer to Exhibits 2 and 3 for map illustrations.

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/), which provides the public access to an electronic copy of this CN and the public notice for this CN. An electronic copy of the CN will be served to the public library in each political subdivision for this Project. The Company retains right-of-way ("ROW") land agents that discuss Project timelines, construction and restoration activities and convey information to affected owners and tenants throughout the Project.

B(6) Construction Schedule

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

Construction of the overall Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project commenced in the spring of 2022, however the adjusted portion of the Project is not anticipated to start construction until June 2023 with a proposed in-service date of 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.

Exhibit 2 in Appendix A identifies the location of the Project area on a USGS 1:24,000 quadrangle map. Exhibit 3 in Appendix A consists of an aerial imagery map from 2021 of the Project area.

To visit the Project starting from Columbus, take I-70 W/I-71 S. Follow signs for Cincinnati to exit 101 for I-270 E. Follow I-270 E to exit 52. Follow US-23 S/Corridor C toward Circleville for 39.9 miles, then take the US-23 S exit toward Waverly/US -50 W/Portsmouth. Follow US-23 S/Corridor C for 32 miles, then turn right onto OH-348 W and continue for 1.6 miles. Turn left and continue for 0.4 miles, then you will arrive at the start of the proposed structure shift area.

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.

A table of property parcel numbers with an indication as to whether the easement/option is necessary to construct and operate the facility is provided below.

Property Parcel Number	Easement Agreement/Option Obtained* (yes/no)	Easement Type
22-1545.000	Yes	Supplemental Easement
22-1545.006	Yes	Supplemental Easement
22-1547.000	Yes	Supplemental Easement
22-1547.001	Yes	Supplemental Easement
22-1579.000	Yes	Supplemental Easement
22-1580.000	Yes	Supplemental Easement
22-1625.000	Yes	Supplemental Easement

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 Project is estimated to include the following:

Voltage:	138 kV
Conductors:	1033.5 one thousand circular mils (kcmil) 54/7 Strands CURLEW ACSR
Static Wire:	AFL OPGW 48 Fibers (Shield Wire 1 side) - 7#8 Alumoweld (Shield Wire other side)
Insulators:	Structure #273: 138 kV Suspension Insulators
	Structure #274: 138 kV Dead-End Insulators
ROW Width:	Structure #273: 100 feet
	Structure #274: 100 feet at structure, 175 feet (Ahead span)
Structure Type:	Structure #273: H-Frame Suspension Galvanized
	Structure #274: Custom Dead-end Monopole Delta Configuration (Galvanized)

B(9)(b) Electric and Magnetic Fields

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line.

No occupied residences or institutions are located within 100 feet of the Project.

B(9)(c) Project Costs

The estimated capital cost of the project.

The entirety of the Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project, which is comprised of applicable tangible and capital costs, is approximately $160,000,000, using a Class 4 estimate. The Project will not require any additional costs to the overall Hillsboro-Millbrook Park Project cost. Pursuant to the PJM OATT, the costs for this Project will be recovered in the AEP Ohio Transmission Company, Inc.'s FERC formula rate (Attachment H-20 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 in Scioto County, Ohio. The area surrounding the two structures proposed for shifts consists of sloped terrain with upland forest and the existing transmission ROW which is vegetated with scrub shrub that is periodically mowed or cut for vegetation management.

The Project has no places of worship or airports identified within 1,000 feet of the proposed alignment. There are no residences identified within 100 feet of the Project's proposed alignment. The Project will not cause any additional impacts to land use.

B(10)(b) Agricultural Land Information

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

The Scioto County Auditor's Office provided a list of parcels registered as Agricultural District Land in April 2023. The Project will not cause any impacts to Agricultural District Lands.

B(10)(c) Archaeological and Cultural Resources

Provide a description of the applicant's investigation concerning the presence or absence of significant archeological 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.

A Phase I Archaeological Investigation was conducted for the Hillsboro-Millbrook Park 138 kV Circuit Rebuild Project as part of OPSB Case No. 21-0268-EL-BLN and the report was provided to the Ohio State Historic Preservation Office ("SHPO") for consultation. No further survey or coordination was required with SHPO for the Project. SHPO correspondence was provided in October 2020 (refer to Appendix C).

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.

Local, state, and federal agency coordination has been completed for this Project as part of OPSB Case No. 21-0268-EL-BLN. No new impacts are proposed as part of this Project. The information below provides the coordination to be completed for the entire Hillsboro-Millbrook Park 138 kV Circuit Rebuild Project.

Three separate Notices of Intent for the overall rebuild project have been filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHC000005 (and will be renewed under Permit OHC000006), and the Company will implement and maintain best management practices ("BMPs"), as outlined in the Project-specific Stormwater Pollution Prevention Plan ("SWPPP"), to minimize erosion and control sediment to protect surface water quality during storm events.

The Company's consultant completed a wetland delineation and stream identification field review of the existing and planned ROW for the Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project. No wetlands, streams, or ponds are located within or adjacent to the proposed Project. Therefore, impacts to aquatic resources are not anticipated and no amendments to the Nationwide Permit authorization are necessary.

There are no 100-year floodplains located within the Project area. There are no other known local, state, or federal requirements that must be met before beginning 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.

Coordination for information regarding threatened, endangered, and rare species was completed for the Project as part of the OPSB Case No. 21-0268-EL-BLN. No new impacts are proposed as part of the Project involving the shift of two structures. The information below provides the coordination completed for the entire Hillsboro–Millbrook Park 138 kV Circuit Rebuild Project.

Coordination with Ohio Department of Natural Resources-Division of Wildlife ("ODNR-DOW") was initiated on September 9, 2019, to obtain Environmental Review and Ohio Natural Heritage Database records within a 1-mile buffer area around the overall project. ODNR-DOW's response was received on January 22, 2020, see Appendix C. In addition, a consultation request was submitted to the U.S. Fish and Wildlife Service ("USFWS") on September 9, 2019, with a response received on December 18, 2019. A copy of the initial Agency Correspondence letters is provided in Appendix C.

Based on consultation from the USFWS, portions of southern Scioto County are in Indiana bat (*Myotis sodalis*) hibernaculum buffers and roost tree buffers. The northern section of the line in Highland County is within many capture buffers of male and female Indiana bats and roost trees. Portions of the Project are also within capture buffers of northern long-eared bats (*Myotis septentrionalis*). The Company has and will continue to complete tree clearing during the restricted timeframe (November 15 – March 15) within the Indiana bat hibernaculum buffer per USFWS guidance. In 2022 a northern long-eared bat was captured during surveys and a five-mile capture buffer was placed around the capture location in Scioto County. No bat surveys are anticipated for 2023.

The endangered rayed bean (*Villosa fabalis*) is a freshwater mussel known to occur in Scioto Brush Creek and the Scioto River, both of which are spanned by the proposed transmission line. The rayed bean prefers substrates of gravel and sand, and they are often associated with, and buried under the roots of, vegetation, including water willow (*Justicia americana*) and water milfoil (*Myriophyllum sp.*). The endangered

clubshell (*Pleurobema clava*) and northern rifffleshell (*Epioblasma torulosa rangiana*) mussels are also known to occur in the Scioto River. USFWS states that if the Project directly or indirectly impacts any of the mussel streams above, they recommend a presence/absence mussel survey. Additionally, if any impact to native riparian vegetation is proposed, they recommend further coordination with USFWS. No impacts to the identified mussel species are anticipated because no in-water work is proposed for the Project.

Known populations of Virginia spiraea (*Spiraea virginiana*) occur in Ohio along long-established gravel bars in Scioto Brush Creek in Scioto County. The current alignment occurs in a township where this species is known to occur but does not cross the Scioto Brush Creek in this township. No further coordination with USFWS is required for this Project.

Lastly, the proposed project also lies within the range of running buffalo clover (*Trifolium stoloniferum*). This species was recently proposed for delisting due to recovery. This species can potentially be found in partially shaded woodlots, mowed areas, and along streams, trails, and ROWs. During coordination with USFWS, no surveys were identified as necessary for the Project.

Consultation with USFWS is currently ongoing and recommendations for protection or minimization measures for federally listed species potentially present within the Project area have not been provided. The Company will follow up with the USFWS to further define the project impact area and any minimization or avoidance efforts that are planned to be implemented.

Based on the consultation response from the ODNR, the western 15,000 feet of the project route, and the portion of the project route between the Ohio River and the Scioto River, are within the vicinity of Indiana bat records. ODNR stated that if suitable Indiana bat habitat occurs within these project areas, it is recommended that trees be conserved. If trees must be cut or removed, the ODNR recommended cutting to occur between October 1 and March 31. The remainder of the Project route may not have records of Indiana bat; however, it is still within the range of Indiana bat. If suitable habitat occurs within the rest of the Project area and trees must be cut, ODNR recommended mist net surveys be conducted for the Indiana bat between June 1 and August 15, prior to any tree cutting. If needed, the Project anticipates tree clearing will take place between November 15 – March 15, to adhere to recommendations from USFWS and ODNR.

According to ODNR, the Project must not have an impact on freshwater native mussels within the Project area and per the Ohio Mussel Survey Protocol, all Group 2, 3, and 4 streams require mussel surveys. The ODNR-DOW recommends no in-water work in any perennial stream from April 15 through June 30 to reduce impacts to indigenous species and their habitat. No in-stream work is currently proposed during construction activities and will not directly impact streams crossed by the Project area. Therefore, mussel surveys are not anticipated. Because no in-water work is proposed in any perennial stream within the Project area, the Project is not likely to impact threatened or endangered aquatic species.

The overall Project is within the range of timber rattlesnake (*Crotalus horridus*), eastern spadefoot (*Scaphiopus holbrookii*), and mud salamander (*Pseudotriton montanus*). ODNR recommends that a DOW-approved herpetologist conduct a habitat suitability survey along the Project route to determine if suitable habitat exists for these species. If suitable habitat is determined to be present, ODNR recommends that a presence/absence survey be conducted, or an avoidance/ minimization plan be developed and implemented by an approved herpetologist. Habitat surveys were conducted for the timber rattlesnake, eastern spadefoot toad, and mud salamanders in January 2021. No suitable habitat was identified for the mud salamander. The Project anticipates avoidance of the mud salamander habitat. A minimization and avoidance plan for the timber rattlesnake has been approved by the ODNR and surveys began in May 2022. To date, no timber rattlesnakes have been found in the overall rebuild Project area.

Suitable habitat for two bird species, the lark sparrow (*Chondestes grammacus*) and loggerhead shrike (*Lanius ludovicianus*), occurs within the overall Project area. ODNR recommends that construction be avoided in lark sparrow nesting habitat during the period of May 1 to June 30. In areas of loggerhead shrike nesting habitat, construction should be avoided from April 1 to August 1. The Company conducted presence/absence and habitat surveys for the lark sparrow and loggerhead shrike as needed during 2022 and 2023 to date to avoid impacts to these species. Neither species nor their nests were documented during the 2022 field surveys. The report of the 2022 survey results for the lark sparrow and loggerhead shrike was submitted to ODNR. No new impacts are proposed as part of the Project involving the shift of two structures.

The Company will continue to coordinate with USFWS and ODNR regarding additional construction requirements as required.

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.

Areas of ecological concern were assessed for the Hillsboro-Millbrook Park 138 kV Circuit Rebuild Project as part of OPSB Case No. 21-0268-EL-BLN. No new impacts are proposed as part of this Project. The information below provides the coordination completed for the entire Hillsboro-Millbrook Park 138 kV Circuit Rebuild Project.

The coordination letter received from the USFWS did not indicate any federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project. The ODNR's response letter also indicated no known unique ecological sites, geologic features, scenic rivers, state wildlife areas, state natural preserves, state or national parks, national forests, or national wildlife refuges within the Project area. The overall project alignment does cross Strait Creek Prairie Bluffs Conservation Area (structures 128–129; 132-133) and Brush Creek State Forest (structures 152, 245-247). However, no impacts are expected as the proposed Project (shift of structures 273 and 274) does not cross any state forest or conservation area.

The Company's consultant prepared an Ecological Resource Inventory Report which outlines the presence or absence of areas of ecological concern, including but not limited to floodplains, wetlands, waterbodies, and wildlife habitats. The Ecological Resource Inventory Report was provided in Appendix E of the LON approved in OPSB Case No. 21-0268-EL-BLN. Wetland delineation, stream identification and general habitat field surveys were completed within the existing ROW from September through October 2019. Land use and natural communities that were encountered within the ROW consisted of maintained transmission line ROW, agricultural land, existing roadway, substations, industrial, residential, fallow-fields, upland forest, upland scrub shrub, PEM wetland, PSS wetland, PFO wetland, and waterbodies. A total of 81 wetlands, 243 streams, and 17 ponds were delineated within the environmental survey corridor for the overall rebuild project. There are no wetlands, streams, or ponds located within the Project area.

The Company will use erosion and sediment control BMPs to avoid or minimize impacts to natural resources where possible.

There are no floodplains or floodways within or adjacent to the proposed Project.

No properties listed in the National Conservation Easement database (http://www.conservationeasement.us) were identified in the immediate vicinity of the Project.

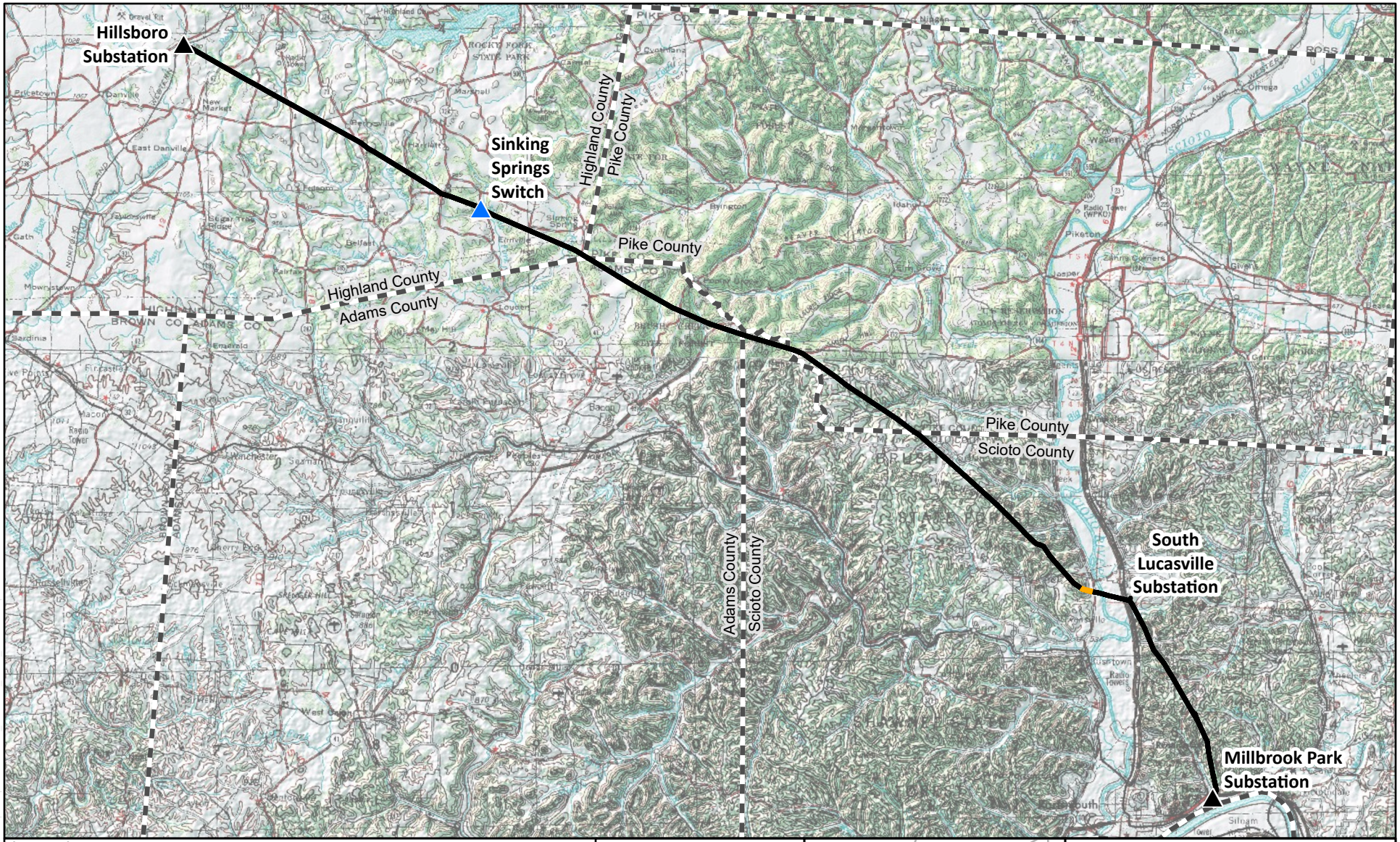
B(10)(g) Unusual Conditions

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.

CONSTRUCTION NOTICE FOR THE HILLSBORO-MILLBROOK PARK 138 KV LINE ADJUSTMENT 2 PROJECT

Appendix A Project Maps



Legend

- Existing Substation
- Proposed Switch
- Hillsboro-Millbrook Park 138 kV Line (Under Construction)
- Area of Proposed Transmission Structure Shifts
- County Boundary

BASEMAP SOURCE:
USGS 1:250,000
Topographic Map

NAD 1983 State Plane Ohio South FIPS 3402

Scale: 1:340,000

May 11, 2023

LOCATOR MAP

Exhibit 1
Vicinity Map

AEP OHIO TRANSMISSION COMPANY
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Hillsboro – Millbrook Park 138 kV Line Adjustment 2 Project

0 2 4 6 8
Miles

Legend

- Proposed Structure Shift
- OPSB-Approved Structure Location
- Proposed Alignment Shift
- Hillsboro-Millbrook Park 138 kV Line (Under Construction)
- Existing 138 kV Transmission Line

BASEMAP SOURCE:
USGS 7.5-minute
Topographic Quadrangle:

NAD 1983 State Plane Ohio South FIPS 3402

Scale: 1:5,531

May 11, 2023

LOCATOR MAP

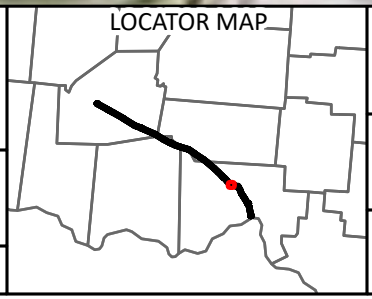

Exhibit 2
Proposed Transmission Line Structure and Centerline Shifts

AEP OHIO TRANSMISSION COMPANY
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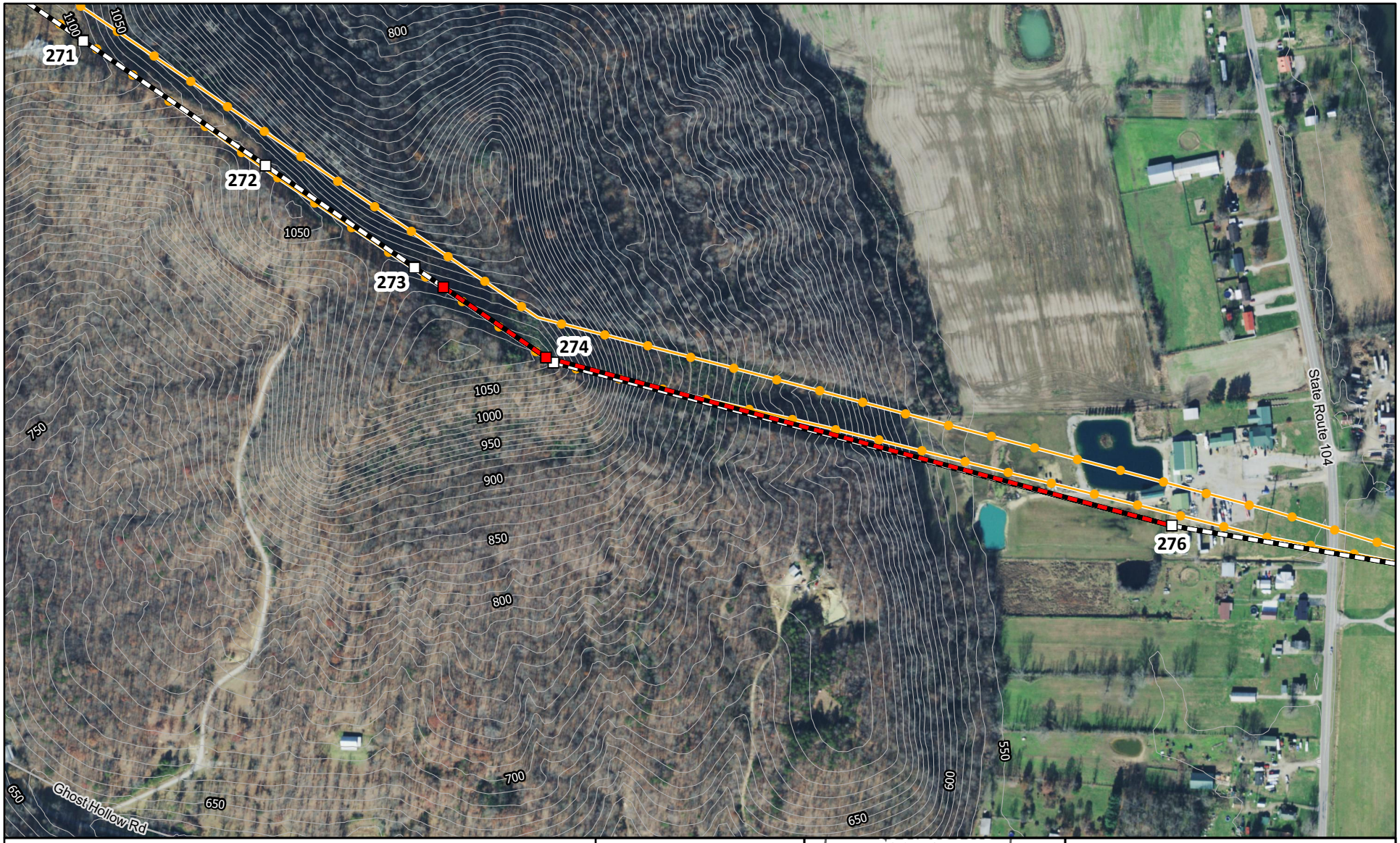
BOUNDLESS ENERGY

Hillsboro – Millbrook Park
138 kV Line Adjustment 2 Project

0 500 1,000
Feet



Legend

- Proposed Structure Shift
- OPSB-Approved Structure Location
- Proposed Alignment Shift
- Hillsboro-Millbrook Park 138 kV Line (Under Construction)
- Existing 138 kV Transmission Line
- Contour - 10 ft.

BASEMAP SOURCE:
USDA National Aerial Imagery Program

NAD 1983 State Plane Ohio South FIPS 3402
Scale: 1:5,531

May 11, 2023

LOCATOR MAP

Exhibit 3
Proposed Transmission Line Structure and Centerline Shifts

AEP OHIO TRANSMISSION COMPANY
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BOUNDLESS ENERGY

Hillsboro – Millbrook Park 138 kV Line Adjustment 2 Project

0 500 1,000
Feet

CONSTRUCTION NOTICE FOR THE HILLSBORO-MILLBROOK PARK 138 KV LINE ADJUSTMENT 2 PROJECT

Appendix B PJM Interconnection Submittal

PUCO Form FE-T9
AEP Ohio Transmission Company
Specifications of Planned Transmission Lines

LINE NAME AND NUMBER:	Hillsboro - Millbrook Park 138 kV / Millbrook Park - South Lucasville 138 kV (s2251)
POINTS OF ORIGIN AND TERMINATION	Hillsboro, Millbrook Park; INTERMEDIATE STATION - Sinking Springs Sw., Millbrook Park, South Lucasville; INTERMEDIATE STATION - North Portsmouth
RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS	43.4 miles / 100ft / 1 circuit (of new construction), 8.5 miles / 100ft / 2 circuit (of new construction)
VOLTAGE: DESIGN / OPERATE	138V / 138kV
APPLICATION FOR CERTIFICATE:	LON, 2020/21
CONSTRUCTION:	2022-2024
CAPITAL INVESTMENT:	$126.1M
PLANNED SUBSTATION:	NAME - N/A; TRANSMISSION VOLTAGE - N/A; ACREAGE - N/A; LOCATION - N/A
SUPPORTING STRUCTURES:	Overhead, Steel, Pole
PARTICIPATION WITH OTHER UTILITIES	N/A
PURPOSE OF THE PLANNED TRANSMISSION LINE	Rebuild of existing 138kV line, to address condition, performance, and risk issues
CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION	Increased risk of further deterioration and performance issues
MISCELLANEOUS:	N/A

AEP Transmission Zone M-3 Process
Hillsboro – Millbrook Park 138 kV Line Rebuild

Need Number: AEP-2019-OH024

Process Stage: Solutions Meeting 02/21/2020

Previously Presented: Needs Meeting 05/20/2019

Supplemental Project Driver:

Equipment Condition/Performance/Risk

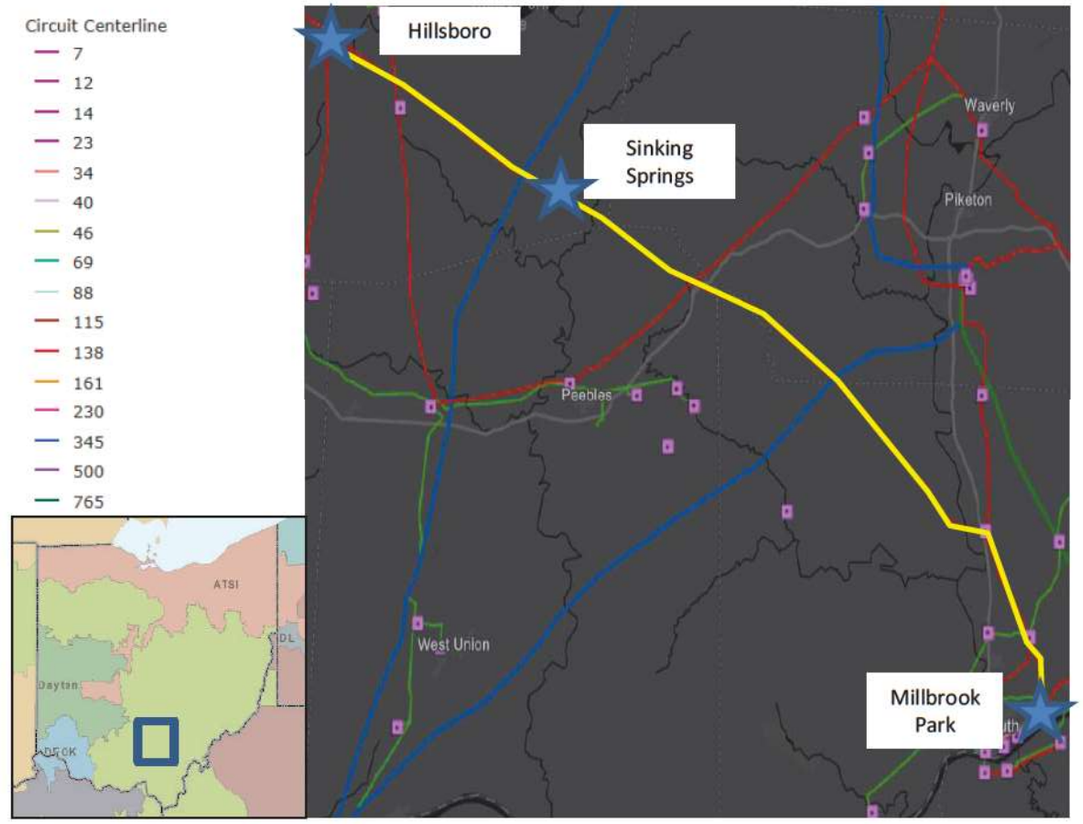
Specific Assumption Reference:

AEP Guidelines for Transmission Owner Identified Needs (AEP Assumptions Slide 8)

Problem Statement:

- The 1943 Hillsboro – Millbrook Park 138 kV circuit (~52 miles) is wood pole construction and has 1,342 open conditions.
- The majority (93%) of the original conductor (vintage 1944 & 1948) is 477 MCM (26/7) ACSR and is still in-service.
- Half of the wood pole structures from the 1940's are still in-service; the remaining are a mixture from 1960's – 1980's.
- There are additional concerns with the shielding, grounding, and hardware along this 52 mile long line.
- Sinking Springs is in a remote part of AEP's service territory making manual switching difficult.
- Originally installed in 1942-1943 timeframe. 98% of the line is on wood structures.
- Age Profile: 53% from 1940's; 4.4% from 1960's; 13% from 1970's; 27% from 1980's; 2.6% from 2000's

Model: N/A



AEP Transmission Zone M-3 Process
Hillsboro – Millbrook Park 138 kV Line Rebuild

Need Number: AEP-2019-OH024

Process Stage: Solutions Meeting 02/21/2020

Proposed Solution:

Portsmouth – Trenton #1 & #2 138kV Cost: $126.1M

Rebuild 43.4 miles single circuit line between Hillsboro – South Lucasville with 1033 ACSR. **Estimated Cost:$92.5M**

Rebuild 8.5 miles double circuit between Millbrook Park – South Lucasville with 1033 ACSR. **Estimated Cost: $33.6M**

Install a new 3-way 2000A 138kV, phase over phase switch at Sinking Springs. **Estimated Cost: $0.7M**

Total Estimated Transmission Cost: $126.8M

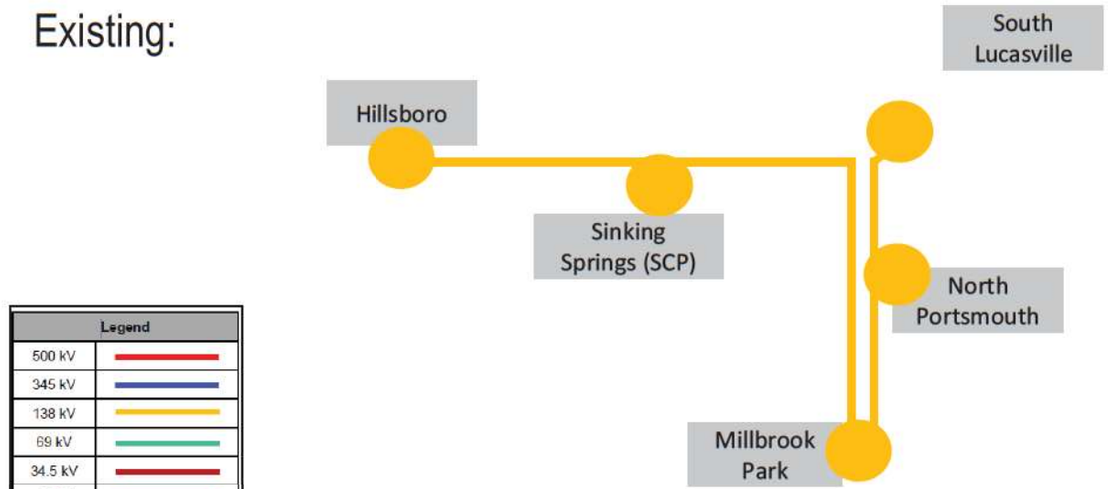
Alternatives Considered:

No viable cost-effective transmission alternative was identified.

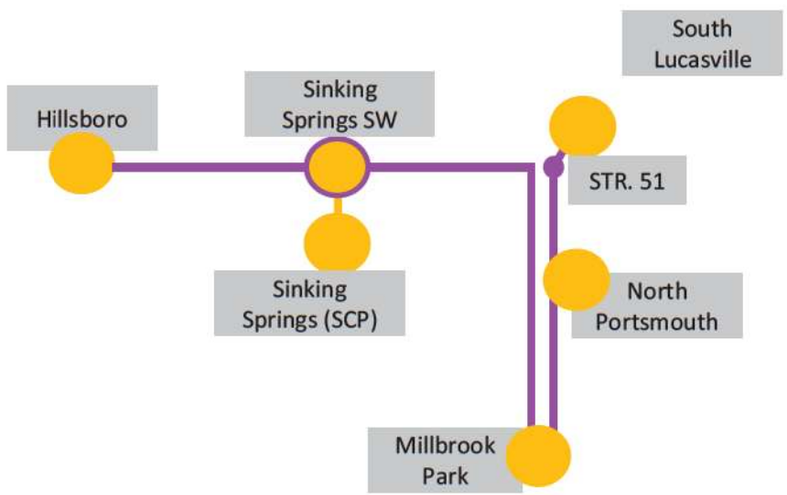
Projected In-Service: 09/30/2022

Project Status: Scoping

Existing:



Proposed:



CONSTRUCTION NOTICE FOR THE HILLSBORO-MILLBROOK PARK 138 KV LINE ADJUSTMENT 2 PROJECT

Appendix C Agency Correspondence

Ohio Department of Natural Resources
MIKE DEWINE, GOVERNOR
MARY MERTZ, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

January 22, 2020

Suzann Collins
Jacobs
400 E. Business Way, Suite 400
Cincinnati, Ohio 45241

Re: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

Project: The proposed project involves the rebuild of approximately 52 miles of existing 138 kV transmission line.

Location: The proposed project is located in Highland, Adams, Pike, and Scioto Counties, 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 records at or within a one-mile radius of the project area:

Chaffweed (*Anagallis minima*), T
Long tail moss (*Anomodon viticulosus*), E
Southern hairy rock cress (*Arabis pycnocarpa* var. *adpressipilis*), P
Wall-rue (*Asplenium ruta-muraria*), T
Canada milk vetch (*Astragalus canadensis*), T
Prairie brome (*Bromus kalmii*), P
Bluehearts (*Buchnera americana*), T
Villous panic grass (*Dichanthelium villosissimum*), P
Wedge-leaved whitlow-grass (*Draba cuneifolia*), T
Glade spurge (*Euphorbia purpurea*), E, FSC
Sullivant's bark moss (*Forsstroemia producta*), E
Milk-pea (*Galactia regularis*), P
Ashy sunflower (*Helianthus mollis*), T
Crested coral-root (*Hexalectris spicata*), P
Michaux's glade-cress (*Leavenworthia uniflora*), T
Narrow-leaved pinweed (*Lechea tenuifolia*), P

Slender blazing-star (*Liatris cylindracea*), T
Three-flowered melic (*Melica nitens*), T
Rock sandwort (*Minuartia michauxii*), P
Common prickly pear (*Opuntia cespitosa*), P
Mountain-rice (*Piptatherum racemosum*), P
Wolf's blue grass (*Poa wolfii*), E
Wherry's catchfly (*Silene caroliniana* ssp. *wherryi*), T
Shining ladies'-tresses (*Spiranthes lucida*), P
Mixed mesophytic forest plant community
Oak pine forest plant community
Blue sucker (*Cycleptus elongatus*), T, FSC
Tippecanoe darter (*Etheostoma tippecanoe*), T
Channel darter (*Percina copelandi*), T
River darter (*Percina shumardi*), T
Shovelnose sturgeon (*Scaphirhynchus platorynchus*), E
Henslow's sparrow (*Ammodramus henslowii*), SC, FSC
Chuck-will's-widow (*Caprimulgus carolinensis*), SI
Bewick's wren (*Thryomanes bewickii*), X, FSC
Brush Creek State Forest – ODNR Division of Forestry
Strait Creek Prairie Bluff State Nature Preserve – The Nature Conservancy

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; A = species recently added to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

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 western 15,000 feet of the project route, and the portion of the project route between the Ohio River and the Scioto River are within the vicinity of records for the Indiana bat (Myotis sodalis), a state endangered and federally endangered species. Presence of the Indiana bat has been established in the area, and therefore additional summer surveys would not constitute presence/absence in the area. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (Carya ovata), shellbark hickory (Carya laciniosa), bitternut hickory (Carya cordiformis), black ash (Fraxinus nigra), green ash (Fraxinus pennsylvanica), white ash (Fraxinus americana), shingle oak (Quercus imbricaria), northern red oak (Quercus rubra), slippery elm (Ulmus rubra), American elm (Ulmus americana), eastern cottonwood (Populus deltoides), silver maple (Acer

saccharinum), sassafras (Sassafras albidum), post oak (Quercus stellata), and white oak (Quercus alba). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31.

The remainder of the project route is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior any to cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the purple cat's paw (*Epioblasma o. obliquata*), a state endangered and federally endangered mussel, the sheepnose (*Plethobasus cyphyus*), a state endangered and federally endangered mussel, the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, the northern riffleshell (*Epioblasma torulosa rangiana*), a state endangered and federally endangered mussel, the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel, the fanshell (*Cyprogenia stegaria*), a state endangered and federally endangered mussel, the pink mucket (*Lampsilis orbiculata*), a state endangered and federally endangered mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, the little spectaclecase (*Villosa lienosa*), a state endangered mussel, the long-solid (*Fusconaia maculata maculata*), a state endangered mussel, the elephant-ear (*Elliptio crassidens crassidens*), a state endangered mussel, the butterfly (*Ellipsaria lineolata*), a state endangered mussel, the ebonyshell (*Fusconaia ebena*), a state endangered mussel, the sharp-ridged pocketbook (*Lampsilis ovate*), a state endangered mussel, the washboard (*Megalonaias nervosa*), a state endangered mussel, the Ohio pigtoe (*Pleurobema cordatum*), a state endangered mussel, the pyramid pigtoe (*Pleurobema rubrum*), a state endangered mussel, the yellow sandshell (*Lampsilis teres*), a state endangered mussel, the monkeyface (*Quadrula metanevra*), a state endangered mussel, the wartyback (*Quadrula nodulata*), a state endangered mussel, the fawnsfoot (*Truncilla donaciformis*), a state threatened mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, and the threehorn wartyback (*Obliquaria reflexa*), a state threatened mussel.

This project must not have an impact on freshwater native mussels along the project route. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2018), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 10 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. This is further explained within the Ohio Mussel Survey Protocol. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, as a last resort, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any

subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. The Ohio Mussel Survey Protocol (2018) can be found at:

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

The project is within the range of the popeye shiner (*Notropis ariommus*), a state endangered fish, the shortnose gar (*Lepisosteus platostomus*), a state endangered fish, the shovelnose sturgeon (*Scaphirhynchus platorynchus*), a state endangered fish, the mountain madtom (*Noturus eleutherus*), a state endangered fish, the northern madtom (*Noturus stigmosus*), a state endangered fish, the goldeye (*Hiodon alosoides*), a state endangered fish, the blue sucker (*Cycleptus elongatus*), a state threatened fish, the American eel (*Anguilla rostrata*), a state threatened fish, the channel darter (*Percina copelandi*), a state threatened fish, the bigeye shiner (*Notropis boops*), a state threatened fish, the Tippecanoe darter (*Etheostoma tippecanoe*), a state threatened fish, the paddlefish (*Polyodon spathula*), a state threatened fish, and the river darter (*Percina shumardi*), a state threatened fish. The DOW recommends no in-water work in perennial streams from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. Due to the location, this project is not likely to impact this species.

The project is within the range of the timber rattlesnake (*Crotalus horridus 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. The DOW recommends that a DOW approved herpetologist conducts a habitat suitability survey along the project route to determine if suitable habitat exists for the timber rattlesnake. If suitable habitat is determined to be present, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimization plan be developed and implemented by the approved herpetologist.

The project is also 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. The DOW recommends that a DOW approved herpetologist conducts a habitat suitability survey along the project route to determine if suitable habitat exists for the eastern spadefoot toad. If suitable habitat is determined to be present, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimization plan be developed and implemented by the approved herpetologist.

The project is within the range of the mud salamander (*Pseudotriton montanus*), a state threatened species. The DOW recommends that a DOW approved herpetologist conducts a habitat suitability survey along the project route to determine if suitable habitat exists for the mud salamander. If suitable habitat is determined to be present, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimization plan be developed and implemented by the approved herpetologist.

The project is within the range of the green salamander (*Aneides aeneus*), a state endangered amphibian. Due to the location, this project is not likely to impact this species.

The project is within the range of the cave salamander (*Eurycea lucifuga*), a state endangered species. Due to the location, this project is not likely to impact this species.

The project is within the range of the Allegheny woodrat (*Neotoma magister*), a state endangered species. The Allegheny woodrat utilizes rocky outcrops such as cliffs and caves in forested areas. Due to the location, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to June 30. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the loggerhead shrike (*Lanius ludovicianus*), a state endangered bird. The loggerhead shrike nests in hedgerows, thickets and fencerows. They hunt over hayfields, pastures, and other grasslands. If thickets or other types of dense shrubbery habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 to August 1. If this habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

Ohio Division of Wildlife
APPROVED HERPETOLOGISTS

The following individuals are approved to conduct habitat suitability surveys and presence/absence surveys for the state listed reptiles and amphibians specified below.

Ramsey Langford
3023 Colon Dr.
Copley, Ohio 44321
ramseylangford@gmail.com
330-447-4840

Approved for:
- Spotted turtle (*Clemmys guttata*)
- Blanding's turtle (*Emydoidea blandingii*)
- Smooth greensnake (*Opheodrys vernalis*)

Teal Dimitrie
3054 Kensington Rd.
Cleveland Heights, Ohio 44118
trichards-dimitrie@enviroscienceinc.com
586-846-0087

Approved for:
- Spotted turtle (*Clemmys guttata*)
- Blanding's turtle (*Emydoidea blandingii*)

Michael Hoggarth
Department of Biology and Earth Science
Otterbein University
Westerville, Ohio 43081
mhoggarth@otterbein.edu
614-823-1667

Approved for:
- Green salamander (*Aneides aeneus*)
- Lake Erie watersnake (*Nerodia sipedon insularum*)
- Eastern hellbender (Cryptobranchus alleganiensis)

Matthew Cross
1736 C Dublin Ct.
Bowling Green, Ohio 43402
eobsoleta01@gmail.com
616-240-6486

Approved for:
- Blanding's turtle (*Emydoidea blandingii*)
- Kirtland's snake (*Clonophis kirtlandii*)

Thomas Pauley
4525 Este Ave.
Cincinnati, Ohio 45232
tpauley@envsi.com
513-451-1777

Approved for:
- Green salamander (*Aneides aeneus*)
- Timber rattlesnake *(Crotalus horridus)*

Bruce Kingsbury
2224 Springfield Ave.
Fort Wayne, Indiana 46805
bruce.kingsbury@ipfw.edu
260-341-2013

Approved for:
- Eastern massasauga (Sistrurus catenatus catenatus)
- Kirtland's snake (Clonophis kirtlandii)
- Blanding's turtle (Emydoidea blandingii)
- Spotted turtle (Clemmys guttata)
- Copper-bellied watersnake (Nerodia erythrogaster neglecta)

Please direct questions concerning this list to: wildlife.permits@dnr.state.oh.us

April 2019

Nicholas Smeenk
2158 Northern Rd.
Columbus, Ohio 43221
614-354-7890

Approved for:
- Eastern massasauga (Sistrurus catenatus catenatus)
- Eastern hellbender (Cryptobranchus alleganiensis)

The following individuals are approved to conduct habitat suitability surveys and presence/absence surveys for all state listed reptiles and amphibians.

Kent Bekker
542 Centerfield Drive
Maumee, Ohio 43537
kbekker@gmail.com
419-376-4384

Ralph Pfingsten
347 Pineview Circle
Berea, Ohio 44017
rap347@wideopenwest.com
440-243-7568

Tim O. Matson
5696 Matson Rd
Geneva, OH 44041
tmatson@cmnh.org
440-417-8196

Jeff Davis
625 Crescent Road
Hamilton, Ohio 45013
ohiofrogs@gmail.com
513-868-3154

Gregory Lipps, LLC
1473 County Road 5-2
Delta, Ohio 43515-9657
greglipps@gmail.com
419-376-3441

Doug Wynn
241 Chase Street, Apt. A1
Russell's Point, Ohio 43348
Sistrurus@aol.com
614-306-0313

Kristin Stanford
OSU Stone Laboratory
P.O. Box 119
Put-in-Bay, OH 43456
theislandsnakelady@yahoo.com
419-285-1847

Please direct questions concerning this list to: wildlife.permits@dnr.state.oh.us

April 2019

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

March 4, 2021

Suzann Collins
Jacobs

TAILS# 03E15000-2019-TA-2039

Re: AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project, Highland, Adams, Pike and Scioto Counties, OH

Dear Ms. Collins,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the 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. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the federally threatened northern long-eared bat (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed 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 travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) 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 and abandoned mines.

The proposed project is in the vicinity of one or more confirmed records of Indiana bats. Portions of the line in southern Scioto County are in Indiana bat hibernaculum buffers and roost tree buffers; the northern section of the line in Highland County is within many capture buffers of male and female Indiana bats and roost trees of these bats; portions of the project are also within capture buffers of Northern long-eared bats. We understand that the majority of the transmission line rebuild is occurring on existing right-of way that is already cleared. However due to the numerous bat records in these portions of the project area, additional information is needed to evaluate this project. **The Service requests additional information on the extent of tree clearing proposed along portions of the line in Scioto and Highland Counties so that we may evaluate the potential for the project to effect the Indiana and northern long-eared bat and recommend appropriate minimization measures.** ***Please provide estimated acreages of forest clearing as well as maps indicating areas to be cleared.***

The endangered rayed bean (*Villosa fabalis*), a freshwater mussel, is known to occur in Scioto Brush Creek and the Scioto River, both of which will be spanned by the transmission line. The rayed bean is usually found in or near shoal or riffle areas, and in the shallow, wave-washed areas of lakes. Substrates typically include gravel and sand, and they are often associated with, and buried under the roots of, vegetation, including water willow (*Justicia americana*) and water milfoil (*Myriophyllum* sp.). Additionally, the endangered clubshell (*Pleurobema clava*) and northern riffleshell (*Epioblasma torulosa rangiana*) mussels are also known to occur in the Scioto River. The clubshell and northern riffleshell inhabit areas with sand or gravel substrate and also prefer areas with riffles and runs.

Should the proposed project directly or indirectly impact any of the mussel streams listed above, we recommend that a survey be conducted to determine the presence or probable absence of rayed bean mussels in the vicinity of the proposed site. Any survey should be designed and conducted in coordination with the Ohio Field Office. Surveyors must have valid Federal and State permits to survey for federally listed mussels in Ohio. If any impact to native riparian vegetation is proposed we recommend further coordination with our office to determine if impacts to these mussel species may occur. Best management practices that minimize stormwater runoff and erosion should be diligently implemented in these areas.

The proposed project lies within the range of Virginia spiraea (*Spiraea virginiana*), a federally listed threatened species. This plant is generally found in riparian habitats along rocky streambanks or sandbars. This species requires a habitat characteristic of flooding and subsequent deposition for successful colonization. Known populations of Virginia spiraea in Ohio occur on large, long-established gravel bars in Scioto County, along Scioto Brush Creek. The current alignment occurs in a township where the species is known to occur, but does not cross the creek in this township. At this time it does not appear that the project will impact this species, however if the alignment were to be modified, further coordination with this office is requested.

The proposed project lies within the range of running buffalo clover (*Trifolium stoloniferum*), a federally listed endangered species that was recently proposed for delisting due to recovery. This species can be found in partially shaded woodlots, mowed areas (lawns, parks, cemeteries), and along streams and trails and in right-of-ways. Running buffalo clover requires periodic disturbance and a somewhat open habitat to successfully flourish, but cannot tolerate full-sun, full-shade, or severe disturbance.

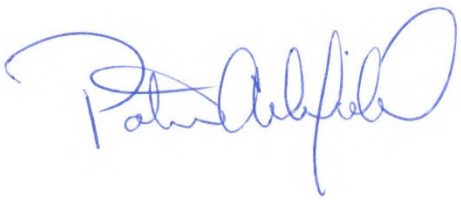
If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that 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.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, 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, consultation with the Service should be initiated to assess any potential impacts.#

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 ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

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

Sincerely,



Patrice M. Ashfield
Field Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW

ESI

ENVIRONMENTAL SOLUTIONS & INNOVATIONS, INC.

4300 Lynn Road, Suite 205
Ravenna, OH 44266
Phone: 513-451-1777 Fax: 513-451-3321

Pesi 1652

17 June 2021

USFWS Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230

RE: AEP Hillsboro to Millbrook Park Project, TAILS# 03E15000-2019-TA-2039
Highland, Adams, Pike, and Scioto Counties, Ohio

To whom it may concern:

This correspondence serves as an update regarding American Electric Power's (AEP) proposed Hillsboro to Millbrook Park Transmission Line Rebuild Project (Project). Project correspondence from USFWS dated 9 March 2020 (Attachment 1) referenced federally listed species potentially occurring within the Project area; a request for additional information on estimated acreages of forest clearing was included.

As typically recommended to avoid impacts to listed bat species, AEP will conduct tree removal and trimming activities between 1 October and 31 March when tree roosting bats are considered absent from the landscape. As a rebuild Project primarily within existing right-of-way (ROW), limited tree clearing is anticipated. AEP's clearing/trimming estimates in Scioto and Highland counties are provided in the table below. Of note, any proposed tree removal within the ROW is primarily young, successional growth. Mapping of clearing areas is provided as Attachment 2.

County	Access Road - Tree Trimming/Removal (Acres)	Existing ROW - Tree Trimming/Removal (Acres)
Scioto	24.5	57.9
Highland	1.6	9.7
Total	**26.1**	**67.6**

AEP seeks USFWS confirmation that limited acreage seasonal tree clearing is sufficient to allow the project to proceed as scheduled. USFWS will be notified if significant Project changes potentially affecting listed species are proposed.

Sincerely,

Valerie Clarkston, M.S.
(513) 382-0925
vclarkston@envsi.com

Attachments
Attachment 1: USFWS Correspondence
Attachment 2: Map of Clearing Areas

From:	Ohio, FW3
To:	mwellman@envsi.com
Cc:	nathan.reardon@dnr.state.oh.us; Parsons, Kate; Allison R Wheaton; Valerie Clarkston
Subject:	[EXTERNAL] AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project, Scioto and Highland Counties in Ohio
Date:	Friday, July 2, 2021 10:12:04 AM
Attachments:	Outlook-pxfclhmu.png Outlook-0smqyk1x.png

This is an **EXTERNAL** email. **STOP**. **THINK** before you CLICK links or OPEN attachments. If suspicious please click the '**Report to Incidents**' button in Outlook or forward to incidents@aep.com from a mobile device.

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

TAILS# 03E15000-2019-TA-2039

Dear Mr. Wellman,

The U.S. Fish and Wildlife Service (Service) has received your June 18, 2021 correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

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

Seasonal Tree Clearing for Federally Listed Bat Species: The proposed project is in the vicinity of one or more confirmed records of Indiana bats. Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested

to determine if fall or spring portal surveys are warranted.

The portion of the project that occurs in central and southern Scioto County and corresponds to maps 15-20 of your submission is within an Indiana bat hibernaculum buffer. For this portion of the project, 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 November 15 and March 15.

The portion of the project in central Highland County corresponding to maps 1-4, and part of Scioto County corresponding to map 14 is in the vicinity of one or more confirmed summer records of Indiana bats. Remaining portions of the project occur in or adjacent to suitable habitat for the Indiana bat but outside of survey records. In these areas, 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 longeared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see http://www.fws.gov/midwest/endangered/mammals/nleb/index.html), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are known or assumed present. Please note that, because Indiana bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.

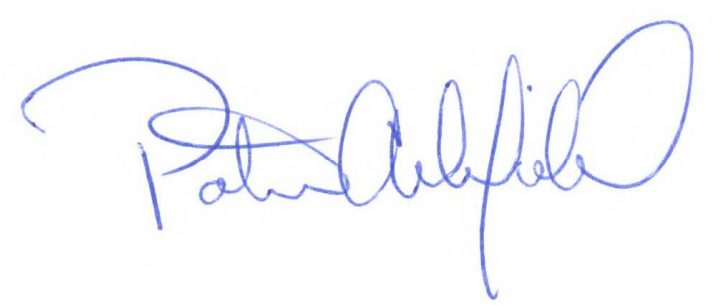
Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts. Thank you for your efforts to conserve listed species and sensitive habitats in Ohio.

We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

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

Sincerely,



Patrice M. Ashfield
Field Office Supervisor

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

From: Nathan.Reardon@dnr.ohio.gov
To: Valerie Clarkston
Cc: Allison R Wheaton; Jeremy Alberts; Doug Gilbert
Subject: [EXTERNAL] RE: 19-775; Avian Surveys on AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project
Date: Monday, March 27, 2023 8:10:46 AM
Attachments: image001.png

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Hi Valerie,

The DOW concurs with the proposed survey efforts outlined below. Please proceed as planned.

Thank you,
Nathan

Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Valerie Clarkston <VClarkston@envsi.com>
Sent: Thursday, March 23, 2023 11:26 AM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Allison R Wheaton <arwheaton@aep.com>; Jeremy Alberts <JAlberts@envsi.com>; Doug Gilbert <DGilbert@envsi.com>
Subject: 19-775; Avian Surveys on AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

Hello Nathan,

AEP's Hillsboro to Millbrook Park Transmission Line Rebuild Project is within the ranges of the state endangered loggerhead shrike (*Lanius ludovicianus;* LOSH) and lark sparrow (*Chondestes grammacus*; LASP). Patches of suitable habitat for both species were documented within the Project area during habitat assessments conducted in December 2020, and a final report was submitted to ODNR-DOW in April 2021. The ODNR-DOW recommended avoiding impacts to suitable habitat

during the nesting season; 1 April – 1 August for LOSH and 1 May – 30 June for LASP.

Because limited construction potentially occurs within suitable habitat for both species during the designated breeding seasons, AEP proposes to implement audio-visual surveys for both LOSH and LASP, as applicable, prior to resuming construction activities in suitable habitat during the species breeding seasons. Survey timing and methods for each species/habitat type are detailed below, but generally follow the *Lark Sparrow Survey Protocol (DRAFT – 9/20/2017)* and *Loggerhead Shrike Survey Protocol (Revised 04/22/2020)*.

LOSH-only Surveys

LOSH-only audio-visual surveys are anticipated for completion within habitat patches HAB-05 (4 points), HAB-08 (2 points), HAB-12 (3 points), HAB-16 (1 point), HAB-18 (3 points), HAB-20 (3 points), HAB-21 (2 points), and HAB-23 (5 points). See attached map series for habitat patch locations and spatial positioning of point counts.

- Point counts are spaced a maximum of 825 feet apart
- Audio-visual surveys are conducted by an avian biologist familiar with LOSH site, sound, and nest identification
- Each point is surveyed three times throughout the breeding season, on separate days, with a minimum of one week between survey dates
- Surveys begin at sunrise and continue for 4 hours after sunrise
- Each point is surveyed for 12 minutes; 6 minutes for playback calls and 6 minutes for passive listening/visual identification
- Surveys are postponed and repeated on subsequent days if wind speeds exceed 12 mph or precipitation occurs
- Surveys are expected to commence 3 April 2023

LOSH-LASP Surveys

Some habitat patches are suitable for both species including: HAB-03 (3 points), HAB-13 (5 points), HAB-17 (8 points), and HAB-24 (2 points). See attached map series for habitat patch locations and spatial positioning of point counts.

- Point counts are spaced a maximum of 825 feet apart
- Audio-visual surveys are conducted by an avian biologist familiar with both LOSH and LASP site, sound, and nest identification
- Each point is surveyed three times throughout the breeding season, on separate days, with a minimum of one week between survey dates
- Surveys begin at sunrise and continue for 3 hours after sunrise
- Each point is surveyed for 12 minutes consistent with LOSH survey protocol; 6 minutes for LOSH playback calls, and 6 minutes for passive listening/visual identification of both species
- Surveys are postponed and repeated on subsequent days if wind speeds exceed 12 mph or precipitation occurs
- Surveys are expected to commence 1 May 2023

If LOSH or LASP are not detected in their respective habitat patches following completion of three survey events, construction can resume; however, additional surveys are potentially required during the next breeding season if construction is still ongoing. If target species are detected, nest searches are completed in suitable habitat and, if target species are found, construction in the habitat patch is

delayed until after the breeding seasons conclude (30 June for LASP and 1 August for LOSH). If no nests are documented, construction may proceed, but additional surveys are potentially required during the following breeding season if construction is ongoing.

A report detailing survey methods and results will be submitted to ODNR-DOW at the conclusion of surveys. If results are negative for listed-species, construction may commence immediately after the last survey efforts within each habitat area. At this time, we request ODNR-DOW concurrence on proposed methods and timelines for LOSH and LASP audio-visual surveys within 12 distinct habitat patches.

Please reach out to us with any questions!

Thank you,

Valerie

ESI
Valerie Clarkston, M.S., CWB®, CE
Project Manager
Environmental Solutions & Innovations, Inc.
8 Bettys Lane | Scott Depot, WV 25560 | USA
office: 513.451.1777 **cell:** 513.382.0925
vclarkston@envsi.com | www.envsi.com

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From: Nathan.Reardon@dnr.ohio.gov
To: Valerie Clarkston
Cc: Doug Gilbert; Michael Wellman; Allison R Wheaton
Subject: [EXTERNAL] RE: 19-775; Avian Surveys on AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project
Date: Wednesday, March 30, 2022 10:30:38 AM
Attachments: image001.png

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Hello Valerie,

The DOW concurs with the proposed surveys as outlined below. The DOW also concurs with the areas that have been identified as suitable habitat with the exception of HAB – 038 and HAB – 039. These two areas can be removed from consideration. If you have any questions, please let me know.

Thank you,
Nathan

Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Valerie Clarkston <VClarkston@envsi.com>
Sent: Monday, March 21, 2022 2:51 PM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Doug Gilbert <DGilbert@envsi.com>; Michael Wellman <mwellman@envsi.com>; Allison R Wheaton <arwheaton@aep.com>
Subject: 19-775; Avian Surveys on AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

Good afternoon, Nathan –

AEP's Hillsboro to Millbrook Park Transmission Line Rebuild Project is within the ranges of the state endangered loggerhead shrike (Lanius ludovicianus; LOSH) and lark sparrow (Chondestes grammacus; LASP). Patches of suitable habitat for both species were documented within the Project area during habitat

assessments conducted in December 2020, and a final report was submitted to ODNR-DOW in April 2021. The ODNR-DOW recommended avoiding impacts to suitable habitat during the nesting season; 1 April – 1 August for LOSH and 1 May – 30 June for LASP.

Because limited construction potentially occurs within suitable habitat for both species during the designated breeding seasons, AEP proposes to implement audio-visual surveys for both LOSH and LASP, as applicable, prior to resuming construction activities in suitable habitat during the species breeding seasons. Survey timing and methods for each species/habitat type are detailed below, but generally follow the Lark Sparrow Survey Protocol (DRAFT – 9/20/2017) and Loggerhead Shrike Survey Protocol (Revised 04/22/2020).

LOSH-only Surveys

LOSH-only audio-visual surveys are anticipated for completion within habitat patches HAB-25 (1 point), HAB-32 (1 point), HAB-34 (1 point), HAB-35 (2 points), and HAB-36 (1 point). See attached map series for habitat patch locations and spatial positioning of point counts.

- Point counts are spaced a maximum of 825 feet apart
- Audio-visual surveys are conducted by an avian biologist familiar with LOSH site, sound, and nest identification
- Each point is surveyed three times throughout the breeding season, on separate days, with a minimum of one week between survey dates
- Surveys begin at sunrise and continue for 4 hours after sunrise
- Each point is surveyed for 12 minutes; 6 minutes for playback calls and 6 minutes for passive listening/visual identification
- Surveys are postponed and repeated on subsequent days if wind speeds exceed 12 mph or precipitation occurs
- Surveys are expected to commence 1 April 2022

LOSH-LASP Surveys

Some habitat patches are suitable for both species including: HAB-24 (2 points), HAB-26 (4 points), HAB-28 (1 point), HAB-31 (10 points), HAB-33 (1 point), HAB-37 (2 points), HAB-38 (2 points), and HAB-39 (2 points). See attached map series for habitat patch locations and spatial positioning of point counts.

- Point counts are spaced a maximum of 825 feet apart
- Audio-visual surveys are conducted by an avian biologist familiar with both LOSH and LASP site, sound, and nest identification
- Each point is surveyed three times throughout the breeding season, on separate days, with a minimum of one week between survey dates
- Surveys begin at sunrise and continue for 3 hours after sunrise
- Each point is surveyed for 12 minutes consistent with LOSH survey protocol; 6 minutes for LOSH playback calls, and 6 minutes for passive listening/visual identification of both species
- Surveys are postponed and repeated on subsequent days if wind speeds exceed 12 mph or precipitation occurs
- Surveys are expected to commence 1 May 2022

If LOSH or LASP are not detected in their respective habitat patches following completion of three survey events, construction can resume; however, additional surveys are potentially required during the next breeding season if construction is still ongoing. If target species are detected, nest searches are completed in suitable habitat and, if target species are found, construction in the habitat patch is delayed until after the breeding seasons conclude (30 June for LASP and 1 August for LOSH). If no nests are documented, construction may proceed, but additional surveys are potentially required during the following breeding season if construction is ongoing.

A report detailing survey methods and results will be submitted to ODNR-DOW at the conclusion of surveys. If results are negative for listed-species, construction may commence immediately after the last survey efforts within each habitat area. At this time, we request ODNR-DOW concurrence on proposed methods and timelines for LOSH and LASP audio-visual surveys within 13 distinct habitat patches.

Please reach out to us with any questions!

Thank you,

Valerie

Valerie Clarkston, M.S., CWB®, CE
Project Manager
Environmental Solutions & Innovations, Inc.
8 Bettys Lane | Scott Depot, WV 25560 | USA
office: 513.451.1777 **cell:** 513.382.0925
vclarkston@envsi.com | www.envsi.com

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From: Michael Wellman
To: Nathan.Reardon@dnr.ohio.gov
Cc: Allison R Wheaton; sarah.tebbe@dnr.ohio.gov; Valerie Clarkston
Subject: [EXTERNAL] RE: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project
Date: Thursday, June 24, 2021 12:32:59 PM
Attachments: image002.png

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Nathan,

Thank you for your quick review and concurrence. Yes, AEP intends to follow the general mediation procedures for timber rattlesnakes (A-K) outlined in Mr. Wynn's report.

If you need anything else, please let us know.

Thanks again,
Michael

From: Nathan.Reardon@dnr.ohio.gov <Nathan.Reardon@dnr.ohio.gov>
Sent: Tuesday, June 22, 2021 9:26 AM
To: Michael Wellman <mwellman@envsi.com>
Cc: Allison R Wheaton <arwheaton@aep.com>; sarah.tebbe@dnr.ohio.gov; Valerie Clarkston <VClarkston@envsi.com>
Subject: RE: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

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Hello Michael,

The DOW concurs with the proposed avoidance measures detailed within "1652_AEP Hillsboro-Millbrook Park_T&E Avoidance_ODNR 19-775" letter. I am assuming that the avoidance measures for the timber rattlesnake will include items A through K under "Timber Rattlesnake Mediation Procedures for Construction Activities" found in Mr. Wynn's habitat assessment report.

Thank you,
Nathan

Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Michael Wellman <mwellman@envsi.com>
Sent: Friday, June 18, 2021 10:11 AM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Allison R Wheaton <arwheaton@aep.com>; Tebbe, Sarah <sarah.tebbe@dnr.ohio.gov>; Valerie Clarkston <VClarkston@envsi.com>
Subject: RE: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

RE: 19-775; T&E Avoidance Measures
AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

Nathan,

With considerations to T&E habitat (identified within the previous report) and construction footprint/schedule, AEP proposes avoidance measures detailed within the attached letter. A table of all species referenced within the ER is also included. ODNR-DOW concurrence is sought that these measures are acceptable.

Sincerely,
Michael

Michael Wellman
Vice President
Environmental Solutions & Innovations, Inc.
4300 Lynn Road, Suite 205 Ravenna, OH 44266
office: 513.451.1777 | **fax:** 513.451.3321
direct: 513.591.4327 | **cell:** 724.688.9718
mwellman@envsi.com | www.envsi.com

From: Nathan.Reardon@dnr.ohio.gov <Nathan.Reardon@dnr.ohio.gov>
Sent: Thursday, April 15, 2021 11:43 AM
To: Valerie Clarkston <VClarkston@envsi.com>
Cc: Michael Wellman <mwellman@envsi.com>; Allison R Wheaton <arwheaton@aep.com>; sarah.tebbe@dnr.ohio.gov

Subject: RE: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

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Hi Valerie,

Thank you for providing the Avian and Herpetological Habitat Survey Report. The DOW concurs with the results for each of the species. In addition, the DOW concurs with the proposed actions (presence/absence surveys and avoidance/minimization measures) for each of the species. Please keep me posted as the project progresses.

Thank you,
Nathan

Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Valerie Clarkston <VClarkston@envsi.com>
Sent: Wednesday, April 14, 2021 10:29 AM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Michael Wellman <mwellman@envsi.com>; Allison R Wheaton <arwheaton@aep.com>; Tebbe, Sarah <sarah.tebbe@dnr.ohio.gov>
Subject: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

Hello Mr. Reardon,

On behalf of AEP, please find below a link to download the report and supporting spatial files that detail results of avian and herpetological habitat assessments conducted for the Hillsboro to Millbrook Park Transmission Line Rebuild Project in Highland, Adams, Pike, and Scioto counties, Ohio:

AEP Hillsboro to Millbrook Park - T&E Habitat Report April 2021

The report documents all T&E species habitat and AEP seeks ODNR's confirmation of the results. AEP is actively assessing the electrical rebuild construction layout and schedule as it compares to the documented T&E habitat, and will propose avoidance and minimization measures as those items are finalized.

Please reach out to us with any questions or if you experience any issue with downloading the files.

Thank you,

Valerie

Valerie Clarkston, M.S.
Midwest Group Manager
Environmental Solutions & Innovations, Inc.
8 Bettys Lane | Scott Depot, WV 25560 | USA
office: 304.760.5803 **fax:** 513.451.3321
direct: 513.591.4315 **cell:** 513.382.0925
vclarkston@envsi.com | www.envsi.com

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ESI

ENVIRONMENTAL SOLUTIONS & INNOVATIONS, INC.

4300 Lynn Road, Suite 205
Ravenna, OH 44266
Phone: 513-451-1777 Fax: 513-451-3321

Pesi 1652 17 June 2021

Mr. Nathan Reardon
Compliance Coordinator
ODNR, Division of Wildlife
2045 Morse Road
Building G
Columbus, OH 43229

Dear Mr. Reardon:

RE: AEP Hillsboro to Millbrook Park Project
T&E Species ODNR #19-775
Highland, Adams, Pike, and Scioto Counties, Ohio

This correspondence serves as an update regarding Ohio state-listed species avoidance and minimization measures associated with the Hillsboro to Millbrook Park Transmission Line Rebuild Project (Project) as proposed by American Electric Power (AEP).

Previous Project correspondence with Ohio Department of Natural Resources – Division of Wildlife (ODNR-DOW) included an Environmental Review (ER; Attachment 1) and an Avian and Herpetological Habitat Survey report. ODNR-DOW concurrence with results of the latter report is provided in Attachment 2. Potential conflicts with most species referenced in the ER are avoided based on Project location, schedule, habitat availability, etc., and are exempted from further consideration. Several species, warranting further habitat review and proposed avoidance measures, are detailed below. Attachment 3 provides a summary of suitable habitat, agency comments, and proposed avoidance measures.

Bats
As recommended to avoid impacts to listed bat species, AEP will conduct minimal tree removal and trimming activities between 1 October and 31 March when tree roosting bats are considered absent from the landscape.

Birds
Proposed construction requires upgrading some existing access roads, installing timber matting or gravel access, and installing structure pads with timber matting or gravel in portions of the Project considered suitable habitat for loggerhead shrike and/or lark sparrow. To avoid conflict during the nesting season, access upgrades and matting or gravel installation are completed in

suitable habitat prior to time-of-year-restrictions (TOYR) associated with each species. Transmission line work during the TOYR period is limited to the previously upgraded and matted footprint.

If a schedule change requires overlap of earth disturbance activities (associated with access upgrades or structure pad installation) with breeding seasons for either bird species, AEP proposes completion of presence/probable absence surveys following protocols established by the ODNR-DOW. If surveys are warranted, AEP will coordinate with ODNR-DOW prior to sampling and provide survey results following completion.

Amphibians
Habitat assessments for state listed amphibian species along the Project's environmental survey corridor revealed no habitat suitable for use by eastern spadefoot toad; however, three areas of suitable midland mud salamander habitat were identified. As currently designed, AEP and its contractors avoid disturbance to the three areas designated as suitable midland mud salamander habitat; if design plan changes potentially affect suitable habitat, AEP will coordinate with ODNR-DOW.

Reptiles
Suitable habitat for the timber rattlesnake within the Project corridor begins southeast of State Route 41 (south of Sinking Springs) and extends to just north of State Route 348. During the warmer spring to early fall period, AEP will retain qualified snake biologists to monitor the Project workspace and remove snakes from areas where construction activities are planned each day.

AEP seeks ODNR confirmation the avoidance measures outlined herein are sufficient to allow the project to proceed as detailed. ODNR-DOW will be notified if any of the above strategies for avoidance and minimization require reconsideration as a result of construction schedule changes.

Sincerely,

Valerie Clarkston, M.S.
(513) 382-0925
vclarkston@envsi.com

Attachments
Attachment 1: ODNR-DOW Environmental Review
Attachment 2: ODNR-DOW concurrence with results of Avian and Herpetological Habitat Survey report
Attachment 3: Summary of Suitable Habitat, Agency Comments, and Proposed Avoidance Measures

Michael Wellman

From: Nathan.Reardon@dnr.ohio.gov
Sent: Thursday, April 15, 2021 11:43 AM
To: Valerie Clarkston
Cc: Michael Wellman; Allison R Wheaton; sarah.tebbe@dnr.ohio.gov
Subject: RE: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

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Hi Valerie,

Thank you for providing the Avian and Herpetological Habitat Survey Report. The DOW concurs with the results for each of the species. In addition, the DOW concurs with the proposed actions (presence/absence surveys and avoidance/minimization measures) for each of the species. Please keep me posted as the project progresses.

Thank you,
Nathan

Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Valerie Clarkston <VClarkston@envsi.com>
Sent: Wednesday, April 14, 2021 10:29 AM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Michael Wellman <mwellman@envsi.com>; Allison R Wheaton <arwheaton@aep.com>; Tebbe, Sarah <sarah.tebbe@dnr.ohio.gov>
Subject: 19-775; AEP Hillsboro to Millbrook Park Transmission Line Rebuild Project

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AEP Hillsboro to Millbrook Park - T&E Habitat Report April 2021

The report documents all T&E species habitat and AEP seeks ODNR's confirmation of the results. AEP is actively assessing the electrical rebuild construction layout and schedule as it compares to the documented T&E habitat, and will propose avoidance and minimization measures as those items are finalized.

Please reach out to us with any questions or if you experience any issue with downloading the files.

Thank you,

Valerie

ESI
Valerie Clarkston, M.S.
Midwest Group Manager
Environmental Solutions & Innovations, Inc.
8 Bettys Lane | Scott Depot, WV 25560 | USA
office: 304.760.5803 **fax:** 513.451.3321
direct: 513.591.4315 **cell:** 513.382.0925
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Attachment 3. Summary of Suitable Habitat, Agency Comments, and Proposed Avoidance Measures.

Common Name	Scientific Name	Status	Typical Habitat	Observed Habitat[1]	ODNR-DOW Comments[2]	AEP Avoidance and Minimization Efforts
Fish						
American eel	*Anguilla rostrata*	Threatened	Medium to large rivers where water is clear with continuous flow. Often found in deep pools near or under cover.	Perennial streams identified during waterbody and wetland delineations; documented under separate cover.	No in-water work in perennial streams from 15 April to 30 June to reduce impacts to indigenous aquatic species and habitat.	No in-stream work is proposed for Project development.
blue sucker	*Cycleptus elongatus*	Threatened	Deep portions of large rivers where flow is swift.			
Tippecanoe darter	*Etheostoma tippecanoe*	Threatened	4th order streams and larger where substrates offer adequate interstitial space and include clean swept gravel and sand. Often found in riffles.			
goldeye	*Hiodon alosoides*	Endangered	Large, turbid rivers, and interconnected marshes, ponds, and lakes.			
shortnose gar	*Lepisosteus platostomus*	Endangered	Adults prefer large, turbid rivers but young are dependent on stagnant backwaters.			
mountain madtom	*Noturus eleutherus*	Threatened[3]	Large rivers with deep and swift riffles, gravel substrate, and flat rocks providing shelter during the day.			
northern madtom	*Noturus stigmosus*	Endangered	Large rivers and deep riffles with high flow.			

Common Name	Scientific Name	Status	Typical Habitat	Observed Habitat[1]	ODNR-DOW Comments[2]	AEP Avoidance and Minimization Efforts
popeye shiner	*Notropis ariommus*	Endangered	Clear, moderate sized streams. Often found in slow moving pools.	Perennial streams identified during waterbody and wetland delineations; documented under separate cover.	No in-water work in perennial streams from 15 April to 30 June to reduce impacts to indigenous aquatic species and habitat.	No in-stream work is proposed for Project development.
bigeye shiner	*Notropis boops*	Endangered[4]	Clear, slow pools with relatively clean-swept gravel substrate.			
channel darter	*Percina copelandi*	Threatened	Large, clear creeks and rivers with relatively silt-free gravel/cobble and sand substrate.			
river darter	*Percina shumardi*	Threatened	Large rivers. Historically found in large western Lake Erie tributaries.			
paddlefish	*Polyodon spathula*	Threatened	Deeper and lower current sections of rivers, lakes, reservoirs, and tailwaters below dams.			
shovelnose sturgeon	*Scaphirhynchus platorynchus*	Endangered	Deep channels of large rivers. Tolerant of high turbidities and prefer gravel and sand substrate.			
Freshwater Mussels						
purple cat's paw	*Epioblasma o. obliquata*	Endangered	Freshwater streams as defined in the Ohio Mussel Survey Protocol (2018)	Freshwater streams as defined in the Ohio Mussel Survey Protocol (2018)	Conduct mussel survey if in-stream impacts are anticipated in listed streams.	No in-stream work is proposed for Project development.
sheepnose	*Plethobasus cyphyus*	Endangered				
clubshell	*Pleurobema clava*	Endangered				
northern rifflesheell	*Epioblasma torulosa rangiana*	Endangered				
rayed bean	*Villosa fabalis*	Endangered				
fanshell	*Cyprogenia stegaria*	Endangered				

Common Name	Scientific Name	Status	Typical Habitat	Observed Habitat[1]	ODNR-DOW Comments[2]	AEP Avoidance and Minimization Efforts
pink mucket	*Lampsilis orbiculata*	Endangered	Freshwater streams as defined in the Ohio Mussel Survey Protocol (2018)	Freshwater streams as defined in the Ohio Mussel Survey Protocol (2018)	Conduct mussel survey if in-stream impacts are anticipated in listed streams.	No in-stream work is proposed for Project development.
snuffbox	*Epioblasma triquetra*	Endangered				
little spectaclecase	*Villosa lienosa*	Endangered				
long-solid	*Fusconaia maculata maculata*	Endangered				
elephant-ear	*Elliptio crassidens crassidens*	Endangered				
butterfly	*Ellipsaria lineolata*	Endangered				
ebonyshell	*Fusconaia ebena*	Endangered				
sharp-ridged pocketbook	*Lampsilis ovate*	Endangered				
washboard	*Megalonaias nervosa*	Endangered				
Ohio pigtoe	*Pleurobema cordatum*	Endangered				
pyramid pigtoe	*Pleurobema rubrum*	Endangered				
yellow sandshell	*Lampsilis teres*	Endangered				
monkeyface	*Quadrula metanevra*	Endangered				
wartyback	*Quadrula nodulata*	Endangered				
fawnsfoot	*Truncilla donaciformis*	Threatened				
black sandshell	*Ligumia recta*	Threatened				

Common Name	Scientific Name	Status	Typical Habitat	Observed Habitat[1]	ODNR-DOW Comments[2]	AEP Avoidance and Minimization Efforts
threehorn wartyback	*Obliquaria reflexa*	Threatened	Freshwater streams as defined in the Ohio Mussel Survey Protocol (2018)	Freshwater streams as defined in the Ohio Mussel Survey Protocol (2018)	Conduct mussel survey if in-stream impacts are anticipated in listed streams.	No in-stream work is proposed for Project development.
Birds						
lark sparrow	*Chondestes grammacus*	Endangered	Nests in grassland habitats with scattered shrub layers, disturbed open areas, and patches of bare soil.	Six areas of habitat are suitable and meet ODNR-DOW minimum acreage requirement for the lark sparrow.	If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of 1 May to 30 June. If this habitat will not be impacted, this Project is not likely to impact the species.	Access road upgrades and work pad installation within suitable habitat to occur outside the TOYR. Additional ODNR-DOW coordination and P/A surveys to occur in the event project schedule changes create conflict with the TOYR.
loggerhead shrike	*Lanius ludovicianus*	Endangered	Nests in hedgerows, thickets and fencerows. Hunts over hayfields, pastures, and other grasslands.	24 areas of habitat are suitable and meet the ODNR-DOW minimum acreage requirement for the loggerhead shrike.	If thickets or other types of dense shrubbery habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of 1 April to 1 August. If this habitat will not be impacted, this Project is not likely to impact the species.	Access road upgrades and work pad installation within suitable habitat to occur outside the TOYR. Additional ODNR-DOW coordination and P/A surveys to occur in the event project schedule changes create conflict with the TOYR.
Amphibians and Reptiles						
green salamander	*Aneides aeneus*	Endangered	Found in or around limestone/sandstone crevices and outcroppings in Adams, Scioto, and Lawrence counties.	n/a	The project is within the range of the green salamander, but due to its location this Project is not likely to impact the species.	n/a

Common Name	Scientific Name	Status	Typical Habitat	Observed Habitat[1]	ODNR-DOW Comments[2]	AEP Avoidance and Minimization Efforts
timber rattlesnake	*Crotalus horridus horridus*	Endangered	Wooded areas, sunlit gaps in the canopy for basking, and deep rock crevices known as den sites for overwintering	One area of suitable habitat was documented within the Project survey corridor.	ODNR-DOW recommended completing a habitat assessment along Project route, and a follow-up presence/absence survey or avoidance plan prepared if suitable habitat is documented.	During the warmer spring to early fall period, AEP will retain qualified snake biologists to monitor the Project workspace and remove snakes from areas where construction activities are planned each day.
eastern hellbender	*Cryptobranchus alleganiensis alleganiensis*	Endangered	Oxygen-rich water of medium-large streams where water is cool and swift-flowing. Large, flat rocks provide cover and breeding habitat.	n/a	The Project is within the range of eastern hellbender, but due to its location this project is not likely to impact the species.	n/a
cave salamander	*Eurycea lucifuga*	Endangered	Crevices or under rocks, logs, or other debris in and around cave openings and springs.	n/a	The Project is within the range of the cave salamander, but due to its location this Project is not likely to impact the species.	n/a
midland mud salamander	*Pseudotriton montanus diastictus*	Threatened	Under rocks or in mud along small woodland streams, springs, and swamps.	Three sites along the Project ROW provide suitable habitat.	ODNR-DOW recommended completing a habitat assessment along Project route, and a follow-up presence/absence survey or avoidance plan prepared if suitable habitat is documented.	AEP and its contractors will avoid disturbance to the three areas designated as suitable midland mud salamander habitat
eastern spadefoot toad	*Scaphiopus holbrookii*	Endangered	Areas of sandy soil associated with river valleys.	No suitable habitat observed within the Project's environmental survey corridor.	ODNR-DOW recommended completing a habitat assessment along Project route, and a follow-up presence/absence survey or avoidance plan prepared if suitable habitat is documented.	n/a

Common Name	Scientific Name	Status	Typical Habitat	Observed Habitat[1]	ODNR-DOW Comments[2]	AEP Avoidance and Minimization Efforts
Mammals						
Indiana bat	*Myotis sodalis*	Endangered	Forested habitat containing dead or dying trees exhibiting exfoliating bark or cracks/crevice suitable for roosting	Desktop analysis revealed suitable summer habitat exists intermittently along the Project's ROW.	If suitable habitat occurs within the Project area and trees must be cut, the DOW recommends cutting between 1 October and 31 March. If suitable trees must be cut during the summer months, the DOW recommends completing a net survey between 1 June and 15 August, prior to cutting.	AEP will conduct tree removal and trimming activities between 1 October and 31 March when tree roosting bats are considered absent from the landscape.
Allegheny woodrat	*Neotoma magister*	Endangered	Rocky outcrops such as cliffs and caves in forested areas	n/a	The Project is within the range of the Allegheny woodrat, but due to its location this project is not likely to impact the species.	n/a

[1]Habitat observed during field surveys conducted for the Project.
[2]Comments contained in the ODNR environmental review letter dated 22 January 2020
[3]Classification updated from Endangered to Threatened based on May 2020 ODNR Species List
[4]Classification updated from Threatened to Endangered based on May 2020 ODNR Species List
SOURCE: ODNR-DOW correspondence 22 January 2020

In reply, refer to
2020-MLT-49570

October 22, 2020

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

RE: Hillsboro-Millbrook 138kV Rebuild Project, Adams, Highland, Pike, and Scioto Counties, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on September 23, 2020 regarding the proposed Hillsboro-Millbrook 138kV Rebuild Project, Adams, Highland, Pike, and Scioto Counties, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for the 83.7 km (52 mi) Hillsboro-Millbrook 138kV Rebuild Project in Highland, Adams, Pike, and Scioto Counties, Ohio* by Ryan J. Weller (Weller & Associates, Inc., 2020).

A literature review, visual inspection, surface collection, shovel probe and shovel test unit excavation was completed as part of the investigations. Five (5) previously identified archaeological sites are located within the project area, Ohio Archaeological Inventory (OAI) #33SC0523, 33HI0219, and 33HI0395-33HI0397. OAI#33HI0219 is recommended for avoidance or additional investigations. The four (4) other previously identified archaeological sites are recommended not eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation.

Twenty (20) new archaeological sites were identified during survey. OAI#33SC0653-33SC0657, 33PK0442-33PK0443, and 33HI0478-33HI0489 are recommended not eligible for listing in the NRHP. OAI#33SC0658 is recommended for avoidance or additional investigations. Our office agrees with these recommendations.

The following comments pertain to the *History/Architecture Investigations for the 83.7 km (52 mi) Hillsboro-Millbrook 138kV Rebuild Project in Highland, Adams, Pike, and Scioto Counties, Ohio* by Austin White and Scott McIntosh (Weller & Associates, Inc., 2020).

A literature review and field survey were completed as part of the investigations. A total of 282 resources fifty years of age or older were newly identified and four extant Ohio Historic Inventory (OHI) properties were identified within the Area of Potential Effects during the field survey.

It is Weller's recommendation that four of the properties identified are eligible for listing in the National Register of Historic Places: SCI0073513 (Criterion C); HIG0000317 (Criteria A and C); HIG0001417 (Criteria A and B); and HIG0001517 (Criterion B). Our office agrees with Weller's recommendations regarding eligibility. Due to the nature of the project as a rebuild and replacement of the existing transmission line, we agree that the project as proposed will have no adverse effect on these historic properties.

RPR Serial No: 1085659, 1085660

In summary, two (2) archaeological sites, OAI#33HI0219 and 33SC0658, are recommended for avoidance or additional investigations. It is our understanding that a portion of the project area was inaccessible for archaeology survey do to landowner restrictions. Testing is scheduled in February 2021. Our office looks forward to additional coordination after this testing can take place.

If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org, or Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1085659, 1085660

In reply, refer to
2020-MLT-49570

November 25, 2020

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

RE: Hillsboro-Millbrook 138kV Rebuild Project, Highland County, Ohio – Phase II Archaeological Assessment at Site 33HI0219

Dear Mr. Weller:

This letter is in response to the correspondence received on November 20, 2020 regarding the proposed Hillsboro-Millbrook 138kV Rebuild Project, Highland County, Ohio, specifically the Phase II Archaeological Assessment at Site 33HI0219. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase II Archaeological Assessment at Site 33HI0219 within the Proposed Hillsboro-Millbrook 138kV Rebuild Project in Highland County, Ohio* by Joshua Engle (Weller & Associates, Inc., 2020).

Our office reviewed and accepted the proposed Phase II scope of work on November 2, 2020. Geophysical investigation, close-interval shovel testing, and 1x1 meter test unit excavations was completed as part of the investigations. After additional investigations, Ohio Archaeological Inventory (OAI) #33HI0219 is recommended not eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation. Please ensure the OAI form for 33HI0219 has been updated for SHPO review.

One (1) archaeological site, OAI#33SC0658, is still recommended for avoidance or additional investigations. It is our understanding that a portion of the project area was inaccessible for archaeology survey do to landowner restrictions. Testing is scheduled in February 2021. Our office looks forward to additional coordination after this testing can take place.

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

RPR Serial No: 1086349