

# Construction Notice for the E. Broad Street – Bexley 138 kV Cut-In Project



An **AEP** Company

PUCO Case No. 23-0851-EL-BNR

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

Submitted by:  
Ohio Power Company

September 19, 2023

# CONSTRUCTION NOTICE FOR E. BROAD STREET – BEXLEY 138 KV CUT-IN PROJECT

## CONSTRUCTION NOTICE

Ohio Power Company

### E. Broad Street – Bexley 138 kV Cut-In Project

#### 4906-6-05 Accelerated Application Requirements

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

#### 4906-6-05(B) General Information

##### B(1) Project Description

**The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Letter of Notification.**

The Company proposes the East Broad Street – Bexley 138 kV Cut-In Project (the “Project”), in the City of Whitehall, Mifflin Township, Franklin County, Ohio. The Project consists of replacing existing structures 70 and 72 along the existing East Broad Street – Bexley 138 kV Transmission to accommodate the proposed Poth Extension East and West 138 kV Transmission Line Project, filed under separate application, (Case No. 23-0850-EL-BLN) into the new non-jurisdictional, Poth Station. The location of the Project, which is located entirely within existing ROW, is shown on Figure 1 and 2 in Appendix A.

The Project meets the requirements for a Construction Notice (CN) as defined by Item 2 (a) of Appendix A to Ohio Administrative Code Section 4906-1-01, *Application Requirement Matrix for Electric Power Transmission Lines*:

*(1) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing transmission line, or replacing structures with a different type of structure, for a distance of:*

*(a) Two miles or less.*

The Project has been assigned Case No. 23-0851-EL-BNR.

##### B(2) Statement of Need

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

The Project is necessary to accommodate the replacement and relocation of distribution equipment at the new non-jurisdictional Poth Station. Interconnecting the substation requires the installation of two

## CONSTRUCTION NOTICE FOR E. BROAD STREET – BEXLEY 138 KV CUT-IN PROJECT

new 138 kV single-circuit transmission lines. The Poth Station will serve AEP Ohio customers in the City of Whitehall area. The installation of the Poth 138 kV West Extension Transmission Line and Poth 138 kV East Extension Transmission Line creates an in-and-out transmission loop into Poth Station.

The need and solution were presented and reviewed with stakeholders at the March 19, 2020 and December 9, 2021 PJM SSRTEP Western Meeting. The project was subsequently assigned PJM project number s2639. This Project was included in the AEP Ohio Transmission Company's 2022 Long-Term Forecast Report on page 17 and 18 (FE-T10).

### **B(3) Project Location**

**The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the Project area.**

The location of the Project in relation to existing transmission lines, proposed transmission lines, and the new non-jurisdictional Poth Substation is shown on Figure 1, in Appendix A. Figure 2, in Appendix A, identifies the Project components on a 2020 aerial photograph.

### **B(4) Alternatives Considered**

**The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.**

The two existing triple circuit (one 138 kV circuit and two 40kV circuits) wood monopoles (70 and 72) will be removed and replaced with two new triple circuit (one 138 kV circuit and two 40 kV circuits) steel monopole self-supporting dead end structures located in close proximity to the existing structure. The new pole locations will remain entirely within the existing East Broad Street – Bexley 138 kV Transmission Line ROW; therefore, the Company will use existing easement rights to accommodate the proposed adjustment. The resulting alignments represent the most suitable and least impactful pole location alternatives as they reduce the need for new ROW, minimizes potential impacts to affected landowners, and result in no wetland, stream, or cultural resource impacts. Therefore, no other alternatives were considered. Socioeconomic, land use, and ecological information is presented in Section B(10).

### **B(5) Public Information Program**

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

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

## CONSTRUCTION NOTICE FOR E. BROAD STREET – BEXLEY 138 KV CUT-IN PROJECT

Project timelines, construction and restoration activities and convey this information to affected owners and tenants.

### **B(6) Construction Schedule**

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

Construction of the Project is planned to begin in January 2024 with an anticipated in-service date of August 2024.

### **B(7) Area Map**

**The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.**

Figure 1, in Appendix A, identifies the location of the Project area on a 2013 United States Geological Survey 1:24,000 Southeast Columbus quadrangle map. Appendix A, Figure 2 identifies the Project components on a 2020 aerial photograph.

To visit the Project from downtown Columbus, Ohio, take I-670 East via the ramp to Airport. Continue for 3.3 miles, then take exit 7 for US-62 W toward Fifth Avenue West. Turn right onto East Fifth Avenue and continue for 2.8 miles. Then, turn right onto North Yearling Road and continue south for 0.4 mile before turning left onto Poth Road and continuing east for 0.5 mile. The Project is located to the northwest of Hyland Court and Poth Road.

### **B(8) Property Agreements**

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

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

<b>Property Parcel Number</b>	<b>Agreement Type</b>	<b>Easement or Option Obtained (Yes/No)</b>
090-007552-00	Existing Easement	N/A
090-008353-00	Existing Easement	N/A

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### **B(9) Technical Features**

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

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

The Project is estimated to include the following:

Voltage: 138kV  
Conductors: Three (3) 954 kCM 45/7 ACSR “Rail” ; (6) 636 kCM 37/0 AAC “Orchid”  
Static Wire: One (1) Alcoa Fujikura OPGW 86 sq. mm / 646 48CT Fiber  
Insulators: Polymer  
ROW Width: 80 feet  
Structure Type: Two (2) triple circuit, monopole steel self-supporting dead-end structures on concrete pier foundations

#### **B(9)(b) Electric and Magnetic Fields**

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

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

###### **i) Calculated Electric and Magnetic Field Levels**

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

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

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

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

##### **B(9)(b)(ii)(c) Project Cost**

**The estimated capital cost of the project.**

The capital costs estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$890,000 using a Class 4 estimate. Pursuant to the PJM OATT, the costs for this

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Project will be recovered in the Ohio Power Company's FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

### **B(10) Social and Economic Impacts**

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

#### **B(10)(a) Operating Characteristics**

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

The Project is located within the City of Whitehall in Mifflin Township, Franklin County, Ohio. Land use immediately surrounding the Project is predominantly commercial or industrial, as classified by the Franklin County Auditor, with residential subdivisions beyond the Project limits. No occupied residences are located within 1,000 feet of the Project. No schools, parks, churches, cemeteries, wildlife management areas, or nature preserve lands within 1,000 feet of the Project.

#### **B(10)(b) Agricultural Land Information**

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

No properties registered as agricultural district land are located in the Project area based on email coordination with the Franklin County Auditor's Office on August 15, 2023. The Project is located entirely within the existing East Broad Street – Bexley 138 kV Transmission Line ROW.

#### **B(10)(c) Archaeological and Cultural Resources**

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

The Company's consultant completed Phase I Archaeological and Phase I History/Architectural surveys, which involved subsurface testing and visual inspection for an area encompassing the Project. The Company recommended to SHPO that the Project would have no adverse effect on historic properties and no further cultural resource work would be necessary. In their responses, dated August 6, 2021 and August 30, 2023, SHPO agreed with the consultant's recommendations. See 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**

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### **list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.**

A Notice of Intent (NOI) will be filed with the Ohio Environmental Protection Agency (OEPA) for authorization of construction storm water discharge under NPDES General Permit for Discharges of Storm Water Associated with Construction Activity OHCO0006. The Company will also provide a copy of the SWPPP to the City of Whitehall. The Company will implement and maintain best management practices as outlined in the Project-specific Storm Water Pollution Prevention Plan to minimize erosion and sediment to Project surface waters during storm events.

No structures or proposed access roads are located within the Federal Emergency Management Agency's ("FEMA") 100-year floodplain area. Therefore, no floodplain permitting is expected to be required for the Project. A local stormwater permit will be obtained from the City of Whitehall prior to the start of construction.

A Notice of Proposed Construction must be reviewed by the Federal Aviation Administration (FAA) for any structures greater than 200 feet in height or located within 20,000 feet of an airport, or for those structures whose filing is requested after running the Notice Criteria Tool to determine if there is potential interference with airport operations. Although the proposed structure heights are less than 200 feet, the John Glenn Columbus International Airport is located within 3,000 feet of the Project. On August 29, 2023, the FAA issued a Determination of No Hazard to Air Navigation for the proposed structures (see Appendix C).

There are no other known local, state, or federal requirements that must be met prior to commencement of the Project.

### **B(10)(e) Threatened, Endangered, and Rare Species**

**Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

On August 4, 2021, coordination letters were submitted to the United State Fish and Wildlife Service ("USFWS") and the Ohio Department of Natural Resources ("ODNR") Ohio Natural Heritage Program ("ONHP") and Division of Wildlife ("DOW"), seeking an environmental review of the Project for potential impacts to threatened and endangered species. USFWS and ODNR provided responses on August 9, 2021 and September 9, 2021, respectively. Copies of the USFWS and ODNR responses are included in Appendix D.

ODNR conducted a search of Natural Heritage Database records within a 1-mile radius of the Project. In their response, ODNR indicates that no records of state endangered or threatened plants or animals were identified within the Project area. Additionally, there are no Natural Heritage Database records of

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state potentially threatened plants, special interest or species of concern animals, or any federally listed species within the Project area.

The ODNR DOW identified that the Project is located within the range of the following state and federally threatened or endangered mussel species: purple cat's paw (*Epioblasma o. obliquata*), clubshell (*Pleurobema clava*), northern riffleshell (*Epioblasma torulosa rangiana*), rayed bean (*Villosa fabalis*), snuffbox (*Epioblasma triquetra*), rabbitsfoot (*Quadrula cylindrica cylindrica*), elephant-ear (*Elliptio crassidens crassidens*), long solid (*Fusconaia maculate maculate*), Ohio pigtoe (*Plurobema cordatum*), pocketbook (*Lampsilis ovata*), washboard (*Megaloniais nervosa*), black sandshell (*Ligumia recta*), fawnsfoot (*Truncilla donaciformis*), pondhorn (*Unio merus tetralasmus*), and threehorn wartyback (*Obliquaria reflexa*). However, ODNR indicated that the Project is not likely to impact these mussel species, due to the Project's location and that there is no in-water work proposed in a perennial stream of sufficient size.

The ODNR DOW indicated that the Project lies within the range of the following state and federally threatened or endangered fish species: Scioto madtom (*Noturus trautmani*), goldeye (*Hiodon alosoides*), Iowa darter (*Etheostoma exile*), popeye shiner (*Notropis ariommus*), northern brook lamprey (*Ichthyomyzon fossor*), spotted darter (*Etheostoma maculatum*), shortnose gar (*Lepisosteus platostomus*), tonguetied minnow (*Exoglossum laurae*), lake chubsucker (*Erimyzon sucetta*), paddlefish (*Polydon spathula*), and Tippecanoe darter (*Etheostoma Tippecanoe*). No in-water work is proposed for the Project; therefore, impacts to the above-listed fish species are not likely.

The ODNR DOW also indicated the Project lies within the range of the following state endangered or threatened bird species: American bittern (*Botaurus lentiginosus*), black-crowned night-heron (*Nycticorax nycticorax*), cattle egret (*Bubulcus ibis*), lark sparrow (*Chondestes grammacus*), least bittern (*Ixobrychus exilis*), northern harrier (*Circus hudsonis*), sandhill crane (*Grus canadensis*), and upland sandpiper (*Bartramia longicauda*). The DOW recommends that construction be avoided during their various nesting periods if suitable habitat is present within the Project. The Project area is composed primarily of industrial land and does not present potentially suitable habitat for the above-listed bird species and therefore no adverse impacts are anticipated for the species. On April 19, 2022, the Company's consultant provided their habitat assessment findings to ODNR, requesting concurrence of the findings and opinions. On April 29, 2022, ODNR provided concurrence that no seasonal construction restrictions or presence/absence surveys were necessary for the Project. Table 4-4 in the Ecological Resources Inventory Report (provided in Appendix D) identifies more detailed information regarding the bird species, particularly their habitat preferences and lack of desired habitat within the ESA.

The ODNR DOW also indicated the Project lies within the range of the state and federally endangered Indiana bat (*Myotis sodalis*), the state and federally threatened northern long-eared bat (*Myotis septentrionalis*), the state endangered little brown bat (*Myotis lucifugus*), and the state endangered tri-colored bat (*Perimyotis subflavus*). The DOW recommends seasonal tree cutting for trees  $\geq 3$  inches diameter at breast height (dbh) between October 1 and March 31 to avoid adverse impacts to these species. Additionally, the DOW recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the Project



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area. Following a desktop habitat assessment, the Company's consultant identified no potential hibernaculum within the Project Area. Only minimal tree clearing (approximately 0.4 acre) is required for the Project, which will be conducted between October 1 and March 31.

The USFWS also advised that the federally endangered Indiana bat and the federally threatened northern long-eared bat have ranges within the Project area. The USFWS recommends seasonal tree clearing (October 1 through March 31) if no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided. If implementation of seasonal tree cutting is not feasible for the Project, the USFWS recommends a summer presence/absence survey be conducted between June 1 and August 15 in coordination with the Ohio Field Office. However, the Company anticipates minimal tree clearing to be conducted between October 1 and March 31. The USFWS indicated that no other adverse effects to any other federally protected species or designated critical habitat is anticipated, due to the type, size, and location of the Project.

### **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.**

Wetland and stream delineation surveys were conducted by the Company's consultant for an approximately 20-acre survey area in July 2021 and March 2022, which encompasses the Project in addition to a larger area (Appendix D). No wetlands, waterbodies, or streams were identified within the Project.

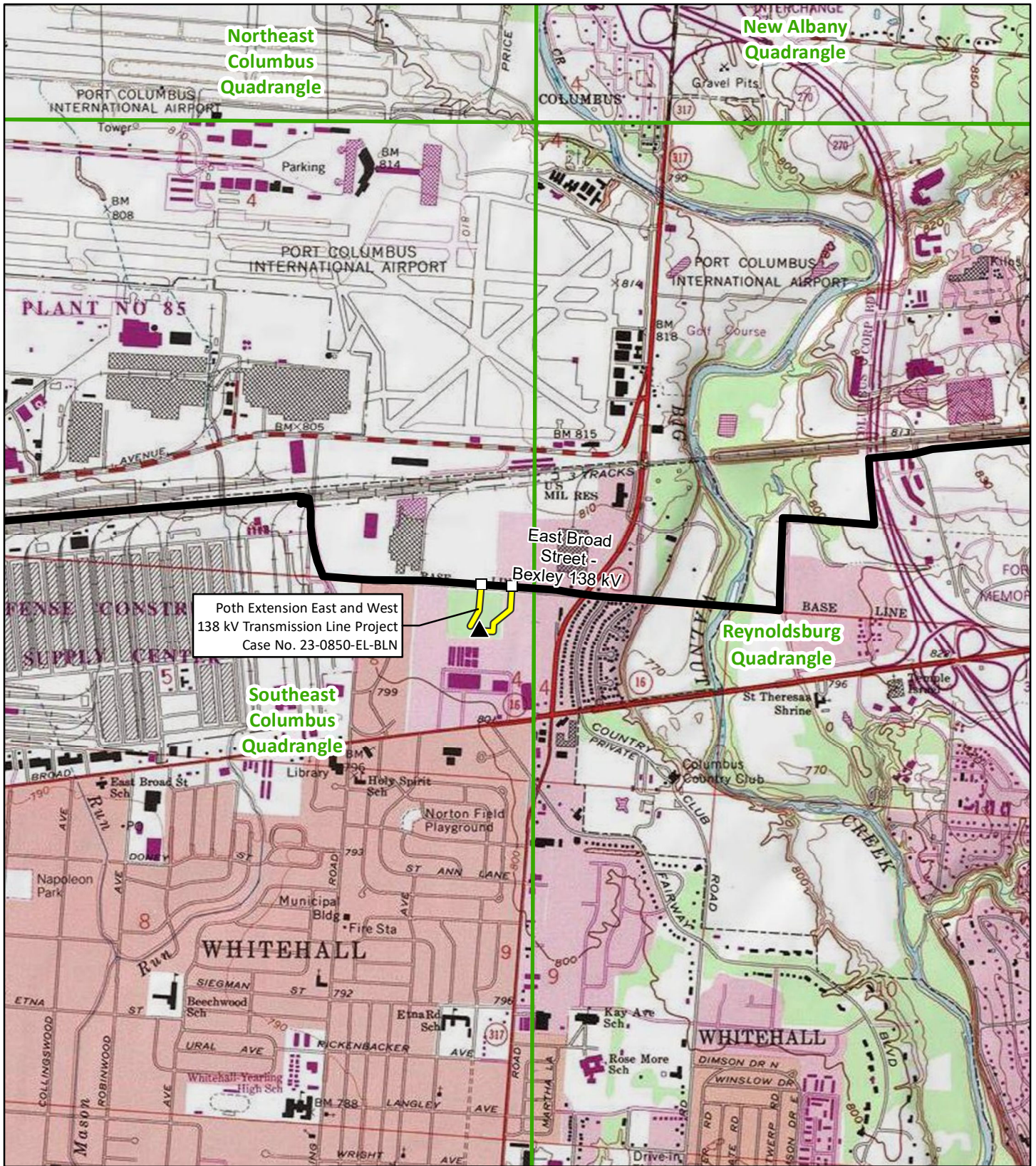
Based on a review of the Protected Areas Database of the United States as well as the Conservation Easement Database, there are no state or national parks, forests, wildlife areas or mapped conservation easements in the vicinity of the Project.

### **B(10)(g) Unusual Conditions**

**Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.**






To the best of the Company's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

**Appendix A Project Maps**



Poth Extension East and West  
138 kV Transmission Line Project  
Case No. 23-0850-EL-BLN

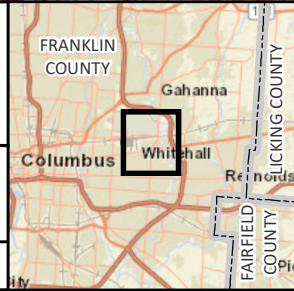
East Broad  
Street -  
Bexley 138 kV

-  New Poth Station (Non-Jurisdictional)
-  Proposed Replacement Structure
-  Poth East and West 138 kV Extensions
-  Existing 138 kV Transmission Line
-  USGS 7.5' Topographic Quad Boundary


Sources:  
Topo Quads (USGS 2013)  
Transmission (AEP 2018)

Coordinate System:  
State Plane Ohio South  
NAD 83

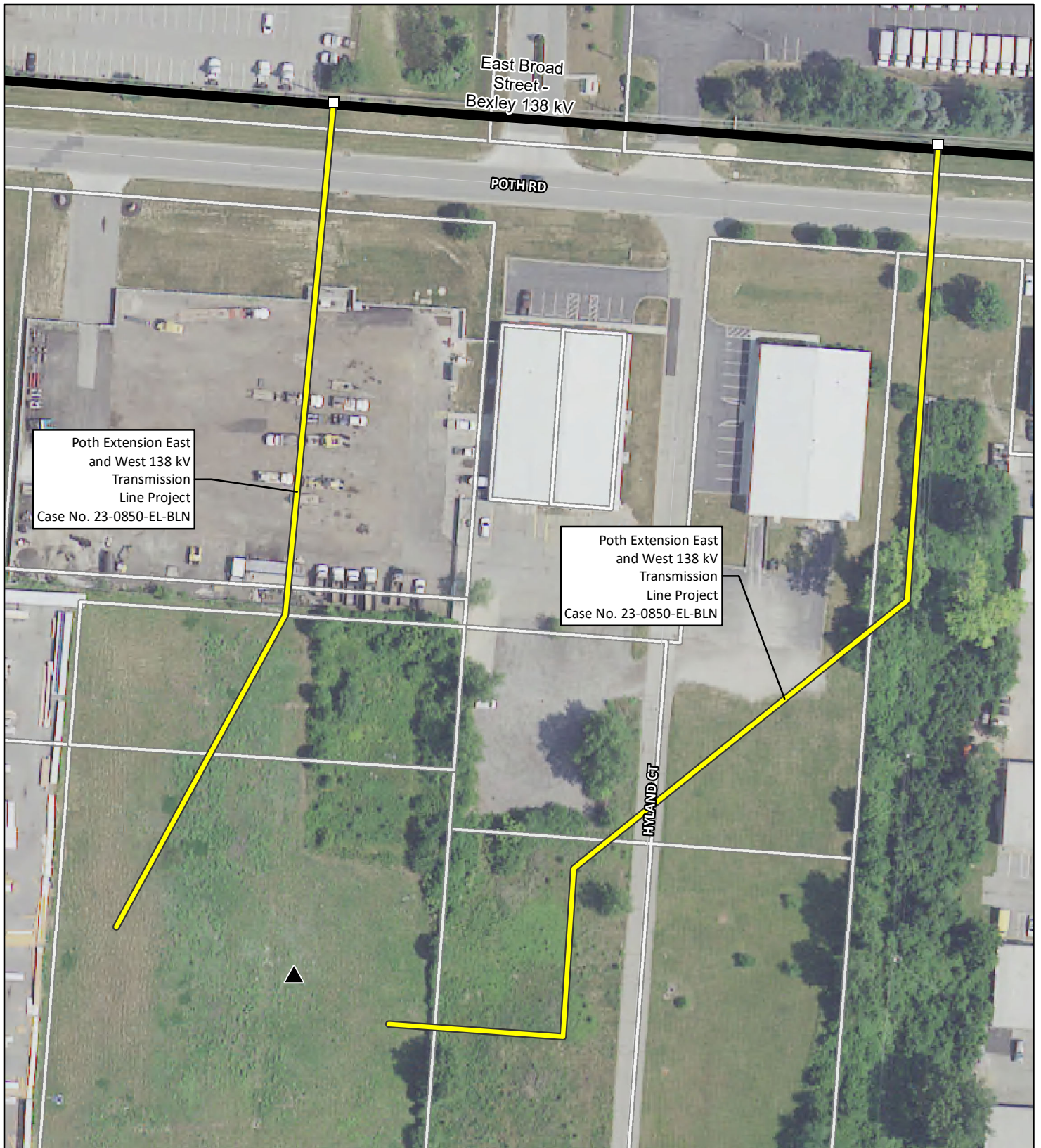
September 15, 2023








**Map 1**  
**Project Area**

 **E. BROAD STREET - BEXLEY  
138 kV CUT-IN PROJECT**

0      0.2      0.4      0.6  
Miles



-  New Poth Station (Non-Jurisdictional)
-  Proposed Structure Replacement
-  Poth East and West 138 kV Extensions
-  Existing 138 kV Transmission Line
-  Parcel Boundary

Sources:  
Franklin County Parcels (2021)  
Imagery (OGRIP 2020)


State Plane Ohio  
South NAD 83

September 15, 2023



**Map 2  
Aerial Map**

**E, BROAD STREET - BEXLEY  
138 KV CUT-IN PROJECT**



0 50 100 150 200

Feet

**Appendix B Long Term Forecast Report and PJM Solution**

## AEP Transmission Zone M-3 Process Whitehall, OH

**Need Number:** AEP-2020-OH016

**Process Stage:** Submission of Supplemental Project for inclusion in the Local Plan 12/09/2021

**Previously Presented:**

Needs Meeting 03/19/2020

Solutions Meeting 12/09/2021

**Supplemental Project Driver:** Customer Service

**Specific Assumption Reference:** AEP Guidelines for Transmission Owner Identified Needs (AEP Assumptions Slide 8)

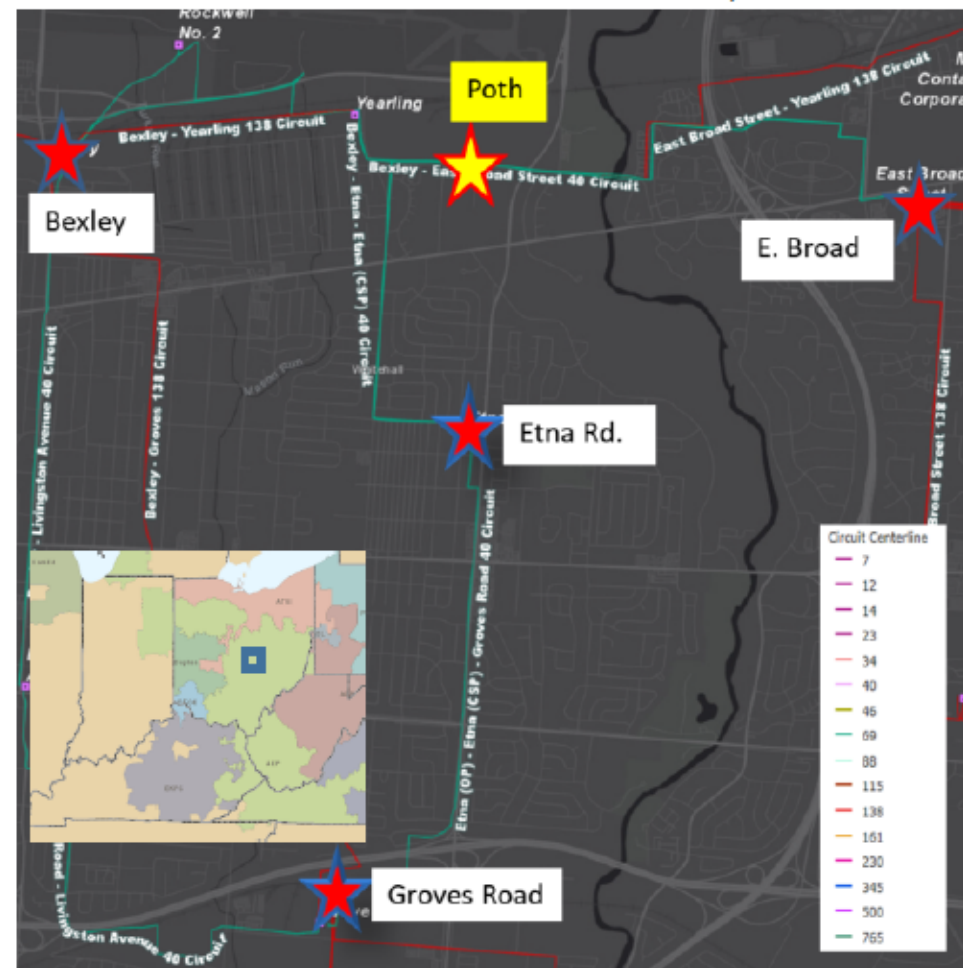
**Problem Statement:**

AEP Ohio has requested a new 138kV delivery point (Poth) off the East Broad Street - Bexley 138kV circuit by December 2022.

At Etna Road station, 101/102 of the relays are electro-mechanical that are no longer supported by the manufacturer, lack SCADA ability, and lack fault collection. 46 kV CB's 30, 31, 32, 33, 34, and 36 (vintage 1955) are oil type breakers, with some have a high number of fault operations, and are an obsolete kV. Over the last 5 years we have had 402,323 CMI and three outages.

Etna-Groves Road 40 kV line is a majority 1960's vintage (70%) wood pole line with the remainder being built since 1990. The conductor is the original 636 ACSR from 1965. There are a total of 56 open conditions on this line with 51% (42/82) of the poles having at least one condition. These conditions include rot top poles and cross arms, woodpecker damage, broken/missing ground leads, and damaged guy wires. Over the last 5 years there have been 1 momentary and 3 permanent outages on this line.

Etna Tap 40 kV extension (part of the Etna - Bexley circuit) is a vintage 1957 (57%) with the remainder between 1970 (8%), 1980 (5%), 1990 (5%), and 2010 (22%). There are currently 30 open conditions with 28% (22/80) of poles having at least one condition. These conditions include rot top poles and cross arms, woodpecker damage, broken/missing ground leads, and damaged guy wires. Over the last 5 years there have been 4 momentary and 2 permanent outages.



## AEP Transmission Zone M-3 Process Whitehall, OH

**Need Number:** AEP-2020-OH016

**Process Stage:** Submission of Supplemental Project for inclusion in the Local Plan 12/09/2021

**Selected Solution:**

- **Poth 138 kV Station:** Construct a greenfield station 138kV ring bus with (4) 3000A 63kA 138kV breakers and two 138/13 kV transformers to replace the existing 40 kV station. **Estimated Cost: \$4.19M (s2639.1)**
- **East Broad 138 kV Station:** Replace CB 3 & CB 7 and 4 disconnect switches with 3000A 63kA 138kV breakers and 4-3000A disconnect switches and install new relaying to coordinate with the new relays at Poth station. **Estimated Cost: \$0.793M (s2639.2)**
- **Yearling 138 kV Station:** Remote end relay settings. **Estimated Cost: \$0.064M (s2639.3)**
- **Poth Extension 138 kV:** Tap the existing East Broad-Bexley 138kV line into Poth station by constructing approximately 0.5 miles of greenfield lines from the line taps. Extend telecom ADSS for relaying and communication from Bexley to Poth & East Broad to Poth. **Estimated Cost: \$3.06M (s2639.4)**

**Total Estimated Cost: \$8.107M**

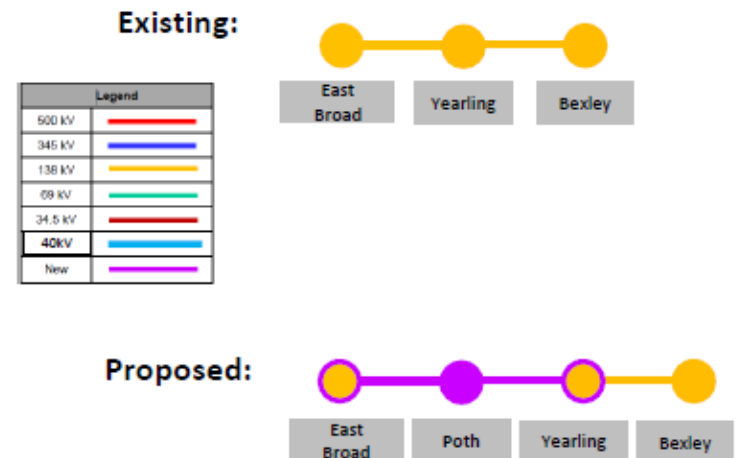
**Ancillary Benefits:** The existing CB-3 at East Broad Station is an oil filled breaker has experienced 13 Fault Ops & the CB-7 is also an oil filled breaker with 15 Fault Ops. Furthermore, the oil filled breakers have more maintenance required due to oil handling. Therefore, along with replacing the remote end relays required for relay coordination, the circuit breakers will be replaced with this project to best align outages in the area. The remaining East Broad needs are presented as AEP-2021-OH045.

**Projected In-Service:** 12/18/2023

**Supplemental Project ID:** s2639.1-4

**Project Status:** Scoping

### Bubble Diagram



## Appendix C Agency Correspondence





In reply, refer to  
2021-FRA-52075

August 6, 2021

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

**RE: Poth Distribution Station and Poth 138kV Transmission Line Extensions, City of Columbus, Franklin County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received on July 9, 2021 regarding the proposed Poth Distribution Station and Poth 138kV Transmission Line Extensions, City of Columbus, Franklin County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Cultural Resource Management Investigations for the 1.85 ha (4.58 ac) Poth Distribution Station and the Approximately .8 km (.5 mi) Poth 138kV Transmission Line Extensions in the City of Columbus, Franklin County, Ohio* by Weller & Associates, Inc. (2021).

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

A literature review and field survey were completed as part of the investigations. One (1) history/architecture resource fifty years of age or older was identified within the Area of Potential Effects (APE) during the field survey. It is Weller's recommendation that this property is not eligible for inclusion in the National Register of Historic Places (NRHP). Our office agrees with Weller's recommendations of eligibility.

Based on the information provided, we agree that the project as proposed will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorrocks@ohiohistory.org](mailto:khorrocks@ohiohistory.org) or Joy Williams at [jwilliams@ohiohistory.org](mailto:jwilliams@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1089279



In reply, refer to  
2021-FRA-52075

April 8, 2022

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

**RE: Poth Distribution Station Project, City of Columbus, Franklin County, Ohio - Addendum**

Dear Mr. Weller:

This letter is in response to the correspondence received on April 6, 2022 regarding the proposed Poth Distribution Station Project, City of Columbus, Franklin County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Addendum Investigations for the Poth Station Project in the City of Columbus, Franklin County, Ohio* by Weller & Associates, Inc. (2022).

A literature review, visual inspection, and shovel probe excavation was completed as part of the investigations. No previously identified archaeological sites are located within the project area and no new archaeological sites were identified during survey. The project area was found to be highly disturbed. Our office agrees no additional archeological investigation is needed. No additional history/architecture survey was needed for the revised project area.

Based on the information provided, we continue to agree that the project as proposed will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorricks@ohiohistory.org](mailto:khorricks@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1092793



Mail Processing Center  
 Federal Aviation Administration  
 Southwest Regional Office  
 Obstruction Evaluation Group  
 10101 Hillwood Parkway  
 Fort Worth, TX 76177

Aeronautical Study No.  
 2023-AGL-16371-OE

Issued Date: 08/29/2023

Lisa Keopaseuth  
 Lisa Keopaseuth  
 8500 Smiths Mill Rd  
 New Albany, OH 43054

**\*\* DETERMINATION OF NO HAZARD TO AIR NAVIGATION \*\***

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Transmission Line Tower 70
Location:	Columbus, OH
Latitude:	39-58-52.82N NAD 83
Longitude:	82-52-34.11W
Heights:	804 feet site elevation (SE)
	81 feet above ground level (AGL)
	885 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

- At least 10 days prior to start of construction (7460-2, Part 1)
- Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 .

This determination expires on 03/01/2025 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

If we can be of further assistance, please contact Raymond Davis, at (817) 222-4613, or [Raymond.a.davis@faa.gov](mailto:Raymond.a.davis@faa.gov). On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2023-AGL-16371-OE.

**Signature Control No: 596633853-597901020**

( DNE )

Mike Helvey

Manager, Obstruction Evaluation Group

Attachment(s)

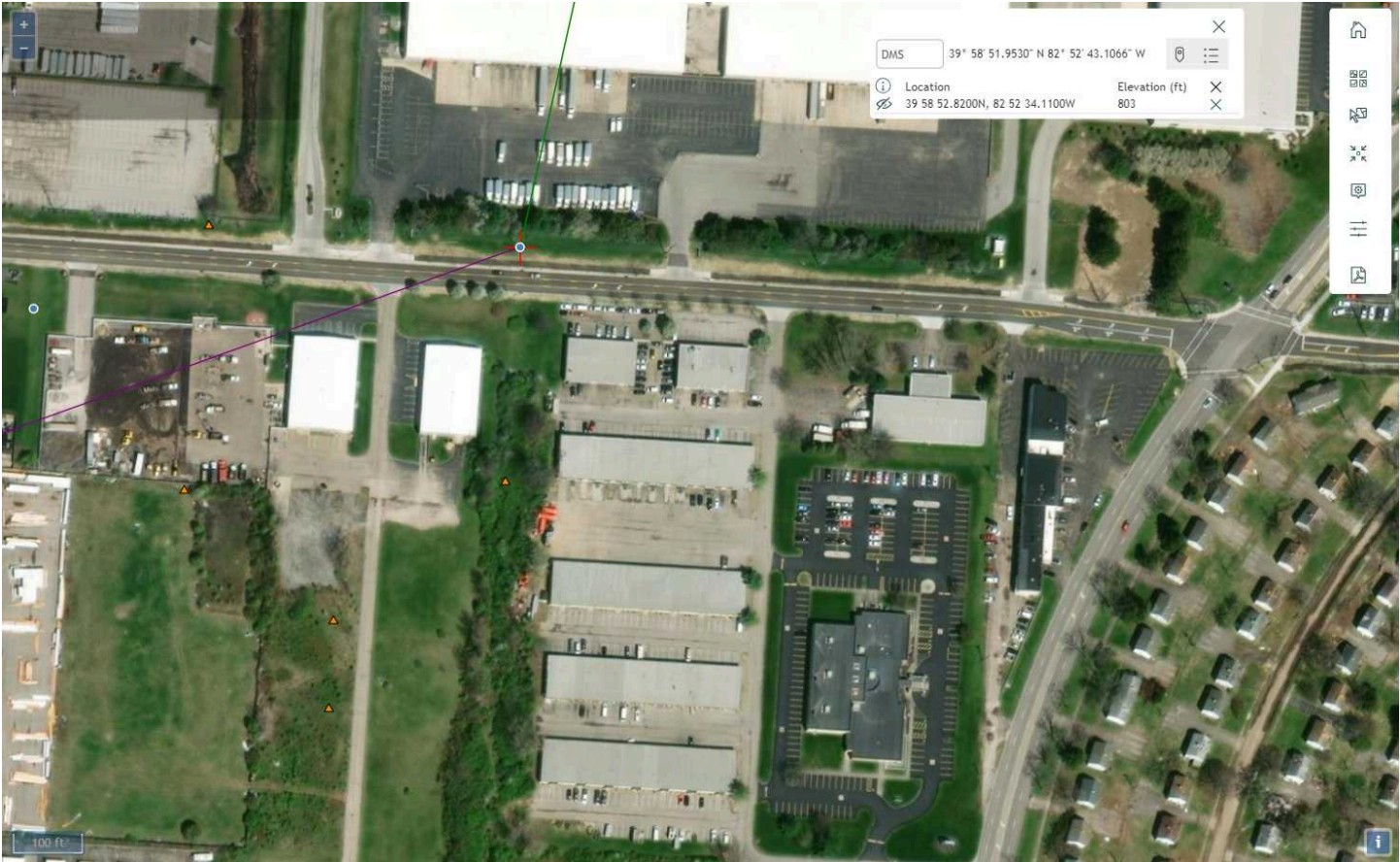
Case Description

Map(s)

## **Case Description for ASN 2023-AGL-16371-OE**

Installing 2 steel, deadend, monopoles to replace wooden Strs. 70 and 72. Also, installing two extension 138kV lines that tap off Strs. 70 and 72 and 4 more steel, deadend, monopoles.

Verified Map for ASN 2023-AGL-16371-OE











Mail Processing Center  
 Federal Aviation Administration  
 Southwest Regional Office  
 Obstruction Evaluation Group  
 10101 Hillwood Parkway  
 Fort Worth, TX 76177

Aeronautical Study No.  
 2023-AGL-16376-OE

Issued Date: 08/29/2023

Lisa Keopaseuth  
 Lisa Keopaseuth  
 8500 Smiths Mill Rd  
 New Albany, OH 43054

**\*\* DETERMINATION OF NO HAZARD TO AIR NAVIGATION \*\***

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Transmission Line Tower 72
Location:	Columbus, OH
Latitude:	39-58-53.12N NAD 83
Longitude:	82-52-39.87W
Heights:	802 feet site elevation (SE)
	81 feet above ground level (AGL)
	883 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

- At least 10 days prior to start of construction (7460-2, Part 1)
- Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 .

This determination expires on 03/01/2025 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
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NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

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This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

If we can be of further assistance, please contact Raymond Davis, at (817) 222-4613, or [Raymond.a.davis@faa.gov](mailto:Raymond.a.davis@faa.gov). On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2023-AGL-16376-OE.

**Signature Control No: 596633863-597901017**

( DNE )

Mike Helvey

Manager, Obstruction Evaluation Group

Attachment(s)

Case Description

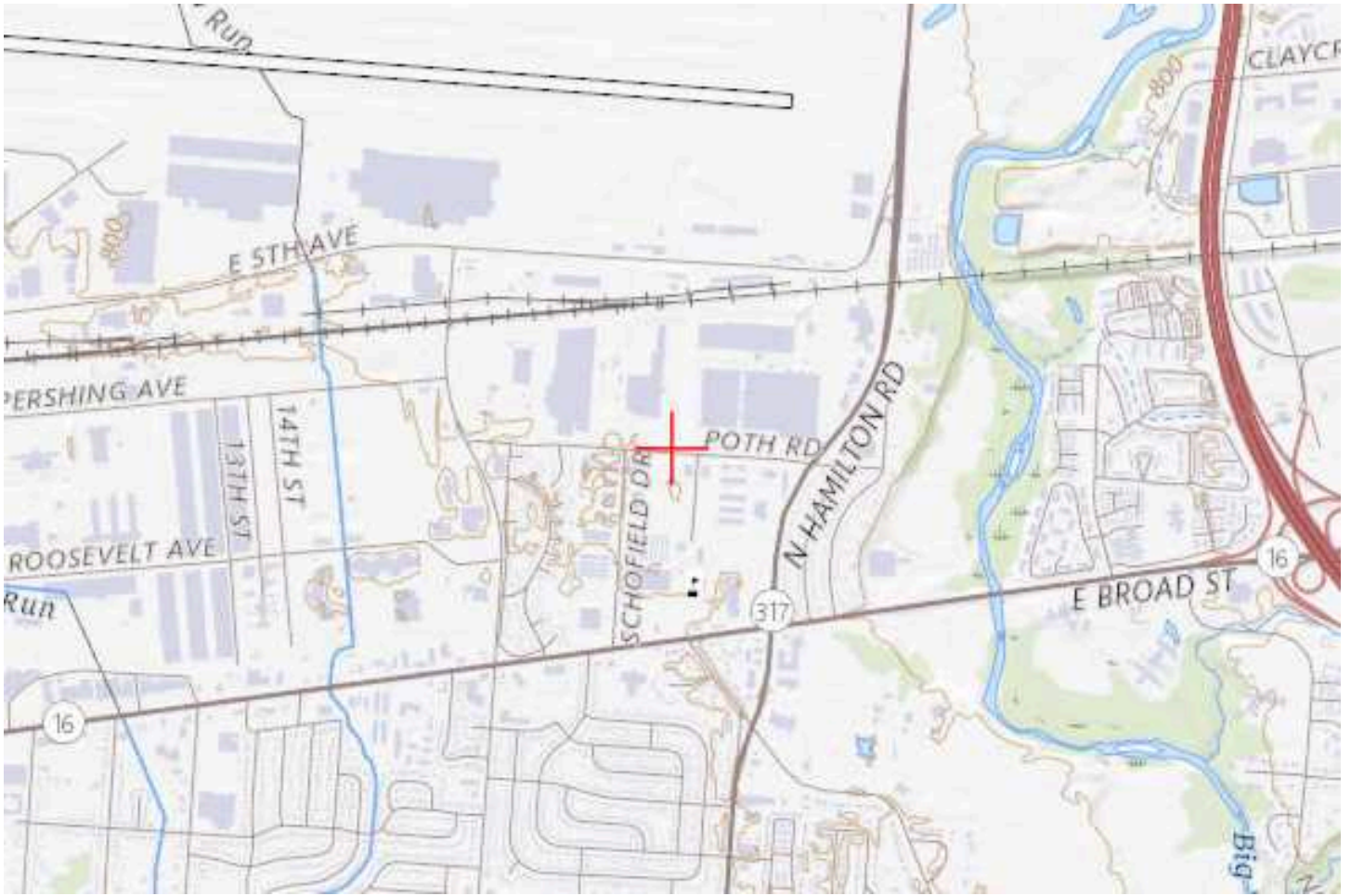
Map(s)

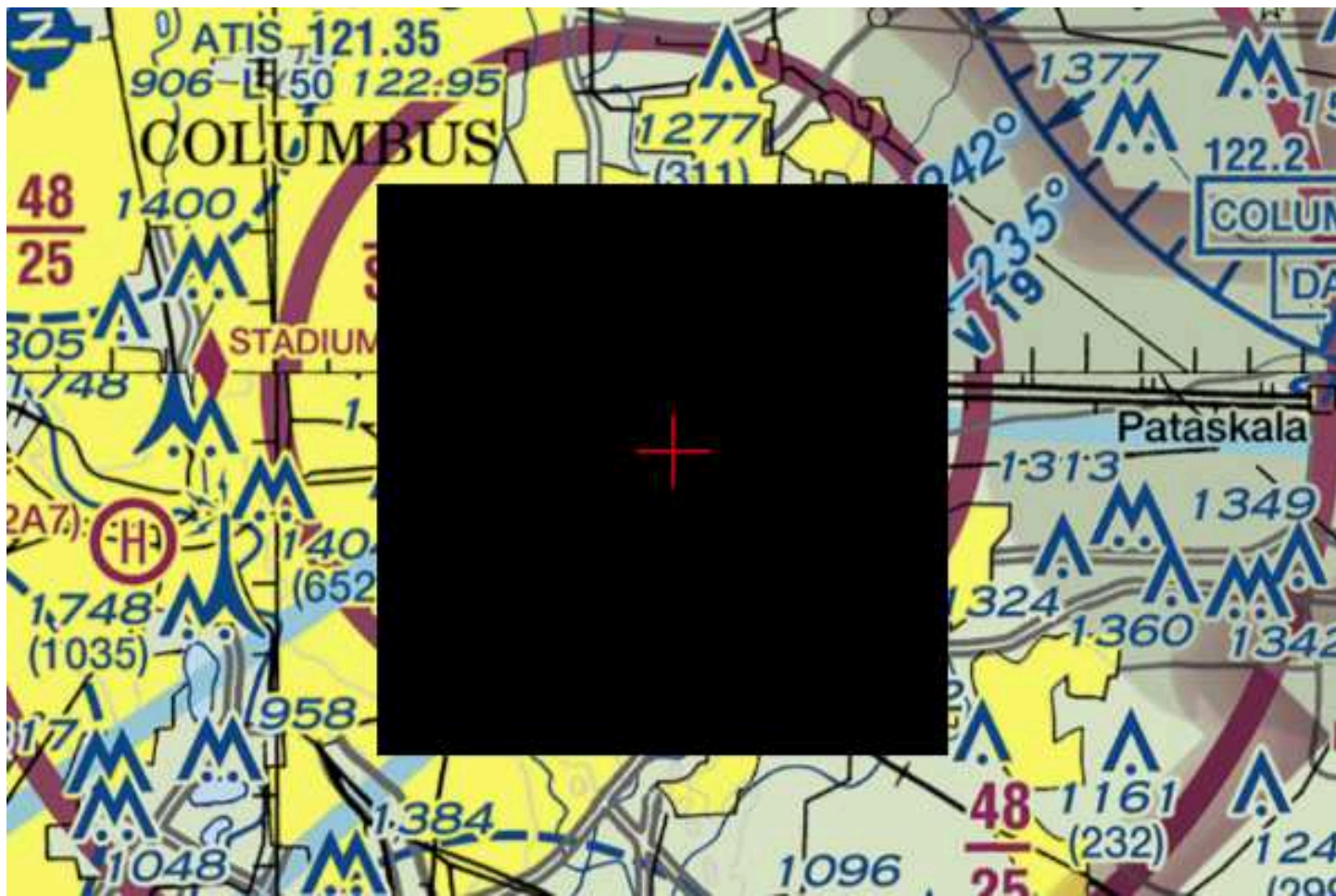
## Case Description for ASN 2023-AGL-16376-OE

Installing 2 steel, deadend, monopoles to replace wooden Strs. 70 and 72. Also, installing two extension 138kV lines that tap off Strs. 70 and 72 and 4 more steel, deadend, monopoles.

Verified Map for ASN 2023-AGL-16376-OE







## **Appendix D      Ecological Resources Inventory Report**

# POTH SUBSTATION AND TRANSMISSION LINE PROJECT ECOLOGICAL SURVEY REPORT



PROJECT NO.: LP2043151.090  
DATE: AUGUST 2023

AEP Transmission  
8600 Smith's Mill Road  
New Albany, OH 43054



An AEP Company

BOUNDLESS ENERGY™

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



WSP.COM





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# 1 INTRODUCTION

On behalf of American Electric Power (AEP) Ohio Transmission Company, Inc. (AEP Ohio Transco), WSP USA (WSP) conducted environmental surveys for the proposed Poth Substation and Transmission Line Project (“Project”), located in the City of Whitehall, in Truro, and Mifflin Townships, Franklin County, Ohio. The environmental survey included a wetland and water resource delineation and characterization of potential habitat for state and federally listed species. The wetland delineation was performed to determine whether wetlands and streams are present within the vicinity of the Project that would meet the definition of Waters of the United States (WoUS) or be subject to regulations implemented by the Ohio Environmental Protection Agency (OEPA), and to document their extents and current conditions if present. The wetland delineation was performed by individuals trained in the three-parameter methodology (hydrophytic vegetation, wetland hydrology, and hydric soils) adopted by the U.S. Army Corps of Engineers (USACE) as outlined in the USACE *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)* (USACE, 2010) and in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987).

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



## 2 BACKGROUND INFORMATION

### 2.1 PROJECT AREA

The Project is located within City of Whitehall, in Truro, and Mifflin Townships, Franklin County, Ohio. The Environmental Survey Area (ESA) is located along Poth Road, north of East Broad Street, west of North Hamilton Road, and east of Yearling Road, (Figure 1, Appendix A). The Project ESA encompasses the proposed Poth Substation (approximate coordinate 38.84302 -83.06468), the removal of a 0.35-mile section of the existing East Broad Street – Bexley 138 kV Transmission Line (approximate coordinate 39.981398, -82.877716), and two new 0.25-mile 138 kV transmission lines connecting the new substation to the existing East Broad Street – Bexley 138 kV Transmission Line (Figure 1, Appendix A). The 19.85-acre ESA is within the Southeast Columbus and Reynoldsburg, Ohio U.S. Geological Survey (USGS) 7.5-minute topographic map quadrangle boundaries. Table 2-1 provides an overview of the Project location.

**TABLE 2-1: GENERAL PROJECT INFORMATION**

<b>COUNTY:</b>	Franklin
<b>TOWNSHIP:</b>	Truro and Mifflin
<b>COORDINATES:</b>	Poth Substation: 38.84302°, -83.06468° East Broad Street – Bexley Line: 39.981398°, -82.877716°
<b>USGS QUADRANGLE:</b>	Southeast Columbus and Reynoldsburg, Ohio
<b>ENVIRONMENTAL SURVEY AREA SIZE (ac.):</b>	19.85
<b>ELEVATION RANGE (ft. above sea level):</b>	796 – 811
<b>8-DIGIT HYDROLOGIC UNIT CODE:</b>	05060001
<b>12-DIGIT HYDROLOGIC UNIT CODE(S) :</b>	05060001-15-05
<b>DATE(S) OF SURVEY :</b>	July 8, 2021 and March 30, 2022

#### 2.1.1 DRAINAGE BASINS

No streams were identified within the ESA, however multiple stormwater inlets and non-jurisdictional drainages were identified within the ESA, which drain to Mason Run or Big Walnut Creek, which are tributaries to the Scioto River and ultimately the Ohio River, which is a traditionally navigable waterway (TNW). The ESA is located within the Upper Scioto (HUC 05060001) drainage basin, hydrologic unit code. The ESA lies within one 12-digit HUC, as outlined in Table 2-2 (USDA, 2019). The OEPA *401 Water Quality Certification for the Nationwide Permits Web Mapping Application* indicates that field-assessed streams within the two identified 12-digit sub-watersheds are denoted as “Possibly Eligible”; indicating that stream impacts within the ESA may require an individual 401 water quality certification (WQC) in watersheds identified as “Possibly Eligible” if impacted streams exhibit habitat features indicative of high quality waters, provided that the OEPA’s general and special limitations and conditions for the nationwide permits are met (OEPA, 2020).



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

8-DIGIT HUC CODE <sup>1</sup>	8-DIGIT HUC CODE NAME <sup>1</sup>	12-DIGIT HUC CODE <sup>1</sup>	12-DIGIT HUC NAME <sup>1</sup>	OHIO EPA SECTION 401 ELIGIBILITY <sup>2</sup>
05060001	Upper Scioto	05060001-15-05	Mason Run-Big Walnut Creek	Possibly Eligible

<sup>1</sup>Source: USDA, 2019

<sup>2</sup>Source: OEPA, 2020



## 3 METHODOLOGY

On July 8, 2021 and March 30, 2022, WSP ecologists traversed the 19.85-acre ESA to conduct a wetland and waters delineation. The physical boundaries of aquatic resources were recorded using a Trimble Global Positioning System (GPS) unit rated for sub-decimeter accuracy. The GPS data was then geo-corrected using Trimble GPS Pathfinder Office software (version 5.60) and reviewed for quality control.

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

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### 3.1 WETLAND AND STREAM DELINEATION

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#### 3.1.1 WETLAND DELINEATION

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

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

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

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#### 3.1.2 STREAM DELINEATION AND ASSESSMENT

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

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



# 4 RESULTS

Two WSP ecologists surveyed the ESA on July 8, 2021 and March 30, 2022 by walking the 19.85-acre ESA and evaluating for wetlands and other WoUS. WSP did not identify any wetland features or streams within the ESA. Two man-made detention basins were delineated with the ESA. Additionally, multiple upland drainages were identified within the ESA. The identified water resources are depicted on the Delineated Features Map (Figure 3, Appendix A).

## 4.1 DESKTOP REVIEW

### 4.1.1 SOILS EVALUATION

According to the NRCS Soil Data for Franklin County, Ohio, there is only one soil map unit within the ESA, as presented in Table 4-1. The soil observed by the WSP ecologists during the reconnaissance of the ESA were consistent with the NRCS soil survey mapping. No hydric soils were identified within the ESA.

TABLE 4-1: SOIL UNITS MAPPED WITHIN THE ESA

SOIL UNIT SYMBOL	SOIL UNIT NAME	PERCENT HYDRIC	HYDRIC RATING <sup>1</sup>	AREA WITHIN ESA (ac.)
BfA	Bennington-Urban land complex, 0 to 2 percent slopes	6	Predominately Non-Hydric	19.36
BfB	Bennington-Urban land complex, 0 to 6 percent slopes	6	Predominately Non-Hydric	0.49

Total Area of Non-Hydric Soils 19.85

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

### 4.1.2 NATIONAL WETLAND INVENTORY REVIEW

According to the NWI maps of the Southeast Columbus and Reynoldsburg, Ohio quadrangle boundaries, there are no mapped NWI boundaries within the 19.85-acre ESA. Locations of the NWI mapped wetlands in the vicinity of the ESA are shown on Figure 2 (Appendix A).

### 4.1.3 FEMA FLOODPLAIN REVIEW

According to Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, there are no 100-year floodplains or regulated floodways within the ESA.

## 4.2 DELINEATED WETLANDS

During environmental surveys, the WSP ecologists did not identify any wetlands within the 19.85-acre ESA.



USACE wetland determination forms verifying upland locations within the ESA are provided in Appendix B. Representative photographs of the upland verification data points were taken and are provided in Appendix C.

### 4.3 DELINEATED STREAMS

During environmental surveys, the WSP ecologists did not identify any streams within the 19.85-acre ESA. Representative photographs of the ESA were taken and are provided in Appendix C

### 4.4 PONDS, LAKES, AND RESERVOIRS

During the environmental survey, the WSP ecologists identified two detention basins within the ESA. As shown on Figure 3, Appendix A, these basins total 0.31 acres, ranging in size from <0.01 to 0.31 acres. The reported acreage only corresponds to areas delineated within the ESA as the boundaries of some basins extended beyond the survey boundary. Both delineated basins appear to be artificial (manmade), as they appear to be constructed in upland or non-jurisdictional waters, based on historical aerial imagery and therefore will likely be considered non-jurisdictional to the USACE.

The location of the identified waterbodies within the ESA are shown in Figure 3 (Appendix A). Table 4-2 provides the waterbody location, size within the ESA, and jurisdictional status. Representative photographs were taken of the identified waterbodies during the field survey and are provided in Appendix C.

In addition to the waterbodies identified, all swales, ditches, and other surface drainages within the ESA were also evaluated for consideration as jurisdictional Waters of the U.S. with respect to the Clean Water Act. Jurisdictional ditches must meet the definition of tributary, have an OHWM, and flow directly or indirectly through another water to a TNW. No roadside ditches, erosional features, or swales were observed throughout the ESA.

**TABLE 4-2: WATERBODIES MAPPED WITHIN THE ESA**

WATERBODY ID	LOCATION		DELINEATED AREA (ACRES)	JURISDICTIONAL?
	LAT	LONG		
Detention Basin PS-01	39.980175	-82.877610	0.31	No
Detention Basin PS-02	39.981592	-82.877502	<0.01	No

### 4.5 VEGETATIVE COMMUNITIES

The WSP ecologists also conducted a general habitat survey in conjunction with the stream and wetland field surveys. A variety of woody and herbaceous habitats, as described below in Table 4-3, are present within the ESA. A breakdown of vegetated land cover is provided, overlain on aerial photography in Figure 4 (Appendix A).





**TABLE 4-3: VEGETATIVE COMMUNITIES WITHIN THE ESA**

VEGETATIVE COMMUNITY	DESCRIPTION	ACREAGE WITHIN THE ESA	PERCENTAGE OF ESA
Developed, High Intensity	These areas consist of developed residential, industrial, and commercial land uses, including roads, buildings, and parking lots. These areas are generally devoid of significant vegetation.	6.94	34.96%
Developed, Open Space	Developed areas, including residential and commercial properties, were observed within the ESA. These landscaped areas are frequently mowed or maintained grasses and forbs.	8.96	45.14%
Scrub/Shrub	Scrub/shrub habitats represent the successional stage between old field and second growth forest, and often emerge in recently harvested forests responding to the lack of overhead canopy.	0.77	3.88%
Old Field	Old Field habitats represent the successional stage between Developed, Open Space and Scrub/Shrub habitat. Often times these areas are previously developed areas that have been left fallow, which area maintained (mowed) once or twice a year.	0.61	3.07%
Successional Hardwood Woodland <sup>1</sup>	Successional hardwood woodlands were present with the ESA. Dominant woody species within these areas include red maple ( <i>Acer rubrum</i> ) and tulip tree ( <i>Liriodendron tulipifera</i> ).	2.26	11.39%
Detention Basins	Detention Basins observed within the ESA Boundary.	0.31	1.56%
<b>Total</b>		<b>19.85</b>	<b>100%</b>

## 4.6 THREATENED AND ENDANGERED SPECIES COORDINATION

The first phase of the evaluation involved a review of online lists of federal and state species of concern. In addition to the review of available literature and a request for Environmental Review was submitted to the Ohio Department of Natural Resources (ODNR). A coordination letter was also submitted to the USFWS soliciting comments on the Project. Detailed descriptions of the agency coordination are provided in proceeding sections. Correspondence from the USFWS and ODNR is included as Appendix D.

### 4.6.1 USFWS COORDINATION

A request for review was submitted to the USFWS on August 4, 2021. In an email dated August 9, 2021 the USFWS provided comments on the Project with regard to federally-listed threatened and endangered species within the Project vicinity. USFWS indicated that there are no federal wildlife refuges, wilderness areas, or critical habitat within the vicinity of the ESA. Comments from USFWS regarding protected species are provided in Table 4-4.

## 4.6.2 ODNR COORDINATION

A request for Environmental Review was submitted to the ODNR on August 4, 2021. The ODNR Environmental Review response, dated September 9, 2021 included comments from the Ohio Natural Heritage Database Program, Division of Wildlife (DOW), and Division of Water Resources. A review of Natural Heritage Database identified no records of state-listed species, rare habitats, or managed areas within the Project area. However, the ranges of multiple species were within a one-mile radius of the ESA. Using this as guidance, WSP has provided observations of threatened and endangered species habitat within the vicinity of the ESA in Table 4-4. The ODNR Environmental Review has been included in Appendix D.

Based on the state-listed avian species identified to have ranges within the Project area (Table 4-4, below), additional coordination with the ODNR was initiated on April 19, 2022. ODNR was provided supplemental Project location information and photos of representative habitat within the site, in order to concur with WSP's findings that no suitable habitat was identified and that the species-specific recommended construction avoidance windows were not necessary and no adverse impacts to these species or their habitats are anticipated to occur. On April 29, 2022 the ODNR responded, indicating that nesting of the eight species of state listed birds within or adjacent to the project area is unlikely. Therefore, seasonal construction restrictions are not necessary. This correspondence is included in Appendix D.

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

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESA	AGENCY COMMENT	IMPACT ASSESSMENT
<b>Mammals</b>						
Indiana bat ( <i>Myotis sodalis</i> )	Endangered	Endangered	Winter hibernacula are provided by caves and mines. Summer roost habitat typically includes live or dead trees with exfoliating bark, crevices, or cavities that can be used for roosting. Open sub-canopy areas and flight corridors are important to allow maneuvering during foraging. Proximity to water sources provides a greater density of insect prey.	Yes (Summer)	The USFWS and ODNR recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible.	Minimal suitable habitat identified, within Successional Hardwood Woodlands habitat within the ESA.
northern long-eared bat ( <i>Myotis septentrionalis</i> )	Threatened	Threatened				No potential hibernaculum were identified within the ESA.
little brown bat ( <i>Myotis lucifugus</i> )	Endangered	Not Listed				No impacts to these species or their habitat is anticipated, as any tree clearing will occur during the recommended October 1 through March 31 clearing window.
tri-colored bat ( <i>Perimyotis subflavus</i> )	Endangered	Not Listed				



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

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESA	AGENCY COMMENT	IMPACT ASSESSMENT
<b>Mussels</b>						
Purple cat's paw ( <i>Epioblasma o. obliquata</i> )	Endangered	Endangered	Commonly inhabits large rivers with sandy gravel substrates. It occurs in water of shallow to moderate depth with a swift current.	No	In-water work in streams with a drainage area >5 mi <sup>2</sup> at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, the Project is not likely to impact this or other aquatic species.
Clubshell ( <i>Pleurobema clava</i> )	Endangered	Endangered	Habitat is typically provided by streams and small rivers with well-oxygenated riffles and sand and gravel substrates.	No		
Northern riffleshell ( <i>Epioblasma torulosa rangiana</i> )	Endangered	Endangered	Habitat is typically provided by large streams and small rivers in firm sand of riffle areas.	No	In-water work in streams with a drainage area >5 mi <sup>2</sup> at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, the Project is not likely to impact this or other aquatic species.
Rayed bean ( <i>Villosa fabalis</i> )	Endangered	Endangered	Habitat is typically provided by smaller, headwater creeks, but they are sometimes found in large rivers.	No		
Snuffbox ( <i>Epioblasma triquetra</i> )	Endangered	Endangered	Typically found in small to medium-sized creeks and some larger rivers, in areas with a swift current.	No		
Rabbitsfoot ( <i>Quadrula cylindrica cylindrica</i> )	Threatened	Threatened	Typically, occurs in a variety of flowing water habitats including small to medium-sized streams and some larger navigable rivers. It usually occurs in shallow areas along the bank.	No		
Elephant-ear ( <i>Elliptio crassidens crassidens</i> )	Endangered	Not Listed	Primarily inhabits large rivers in mud, sand or fine gravel.	No		



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

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESA	AGENCY COMMENT	IMPACT ASSESSMENT
Long solid ( <i>Fusconaia maculata maculate</i> )	Endangered	Not Listed	Typically, found in small to large rivers in gravel with a strong current.	No	In-water work in streams with a drainage area >5 mi <sup>2</sup> at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, the Project is not likely to impact this or other aquatic species.
Ohio pigtoe ( <i>Pleurobema cordatum</i> )	Endangered	Not Listed	Commonly found in strong currents on substrates of sand and gravel.	No		
Pocketbook ( <i>Lampsilis ovata</i> )	Endangered	Not Listed	Creeks to large rivers with quiet to swift current in gravel, sand and cobble — nearly any substrate except for moving sand.	No		
Washboard ( <i>Megaloniaias nervosa</i> )	Endangered	Not Listed	Typically, a large river species, inhabiting the main channel areas of a stream. Suitable habitat consists of slow current areas with substrates composed of sand, gravel, or mud.	No		
Black sandshell ( <i>Ligumia recta</i> )	Threatened	Not Listed	most commonly occupies rivers with strong currents and lakes with a firm substrate of gravel or sand.	No		
Fawnsfoot ( <i>Truncilla donaciformis</i> )	Threatened	Not Listed	Typically occurs in flowing areas of large rivers in soft or coarse substrate.	No		
Pondhorn ( <i>Unio merus tetralasmus</i> )	Threatened	Not Listed	This species is typically found in ponds, small creeks, and headwater streams with sand or mud substrates.	No		
Threehorn wartyback ( <i>Obliquaria reflexa</i> )	Threatened	Not Listed	Typically found in large rivers with moderate current and stable gravel, sand and mud bottoms.	No		



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

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESA	AGENCY COMMENT	IMPACT ASSESSMENT
Fish						
Scioto madtom ( <i>Noturus trautmani</i> )	Endangered	Endangered	Prefers stream riffles of moderate current over gravel bottoms. Water must be of high quality and free of suspended sediments.	No	ODNR has recommended in-water work restriction dates of March 15 <sup>th</sup> to June 30 <sup>th</sup> in perennial streams. If not in-water work is proposed in perennial streams, the Project is not likely to impact this species.	No in-water work is proposed in a perennial stream; therefore, the Project is not likely to impact this or other aquatic species.
Goldeye ( <i>Hiodon alosoides</i> )	Endangered	Not Listed	It prefers turbid slower-moving waters of lakes and rivers.	No		
Iowa darter ( <i>Etheostoma exile</i> )	Endangered	Not Listed	Occurs in clear to lightly turbid water in small cool lakes, bogs, ponds, and in slow-moving waters of small brooks to medium rivers. Primarily associated with submerged vegetation.	No		
Popeye shiner ( <i>Notropis ariommus</i> )	Endangered	Not Listed	Primarily inhabits slowly or moderately flowing rivers or creeks.	No		
Northern brook lamprey ( <i>Ichthyomyzon fossor</i> )	Endangered	Not Listed	They are typically found in the headwaters of streams that are moderately warm and clean.	No		
Spotted darter ( <i>Etheostoma maculatum</i> )	Endangered	Not Listed	Occur in freshwater rivers marked with the presence of boulders and other rocks.	No		
Shortnose gar ( <i>Lepisosteus platostomus</i> )	Endangered	Not Listed	Habitat includes lakes, swamps, and the calm pools and backwaters of creeks and rivers. They are commonly found near vegetation and submerged logs.	No		



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

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESA	AGENCY COMMENT	IMPACT ASSESSMENT
Tonguetied minnow ( <i>Exoglossum laurae</i> )	Endangered	Not Listed	Unable to live in murky waters and requires a clean rock river bottom, typically cool waters within forested banks of large rivers.	No		
Lake chubsucker ( <i>Erimyzon sucetta</i> )	Threatened	Not Listed	Wetlands, ponds, and floodplain lakes with still water and low turbidity.	No	ODNR has recommended in-water work restriction dates of March 15 <sup>th</sup> to June 30 <sup>th</sup> in perennial streams. If not in-water work is proposed in perennial streams, the Project is not likely to impact this species.	No in-water work is proposed in a perennial stream; the therefore, Project is not likely to impact this or other aquatic species.
Paddlefish ( <i>Polyodon spathula</i> )	Threatened	Not Listed	Typically found in deep water of large river basins and their tributaries.	No		
Tippecanoe darter ( <i>Etheostoma tippecanoe</i> )	Threatened	Not Listed	Most commonly in medium to large streams and rivers.	No		
<b>Birds</b>						
American bittern ( <i>Botaurus lentiginosus</i> )	Endangered	Not Listed	This species prefers large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps.	No	If this type of habitat will be impacted, construction should be avoided during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.	No suitable habitat was observed. Therefore, no impacts to these species or their habitat is anticipated. Concurrence from ODNR regarding lack of suitable habitat was received on April 29, 2022.
Black-crowned night-heron ( <i>Nycticorax nycticorax</i> ),	Threatened	Not Listed	Wide variety of aquatic habitats, around both fresh and saltwater, including marshes, rivers, ponds, and canals. Nests in groves of trees, in thickets, or on ground, usually on islands or above water, perhaps to avoid predators.	No		



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

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESA	AGENCY COMMENT	IMPACT ASSESSMENT
Cattle egret ( <i>Bubulcus ibis</i> )	Endangered	Not Listed	Widespread in any kind of open country, including pastures, plowed fields, lawns, roadsides. Also, in aquatic habitats, including flooded fields, marshes. Nests in trees or shrubs, in colonies with other wading birds	No	ODNR has recommended that potential nesting habitat be avoided during the May 15 <sup>th</sup> to August 15 <sup>th</sup> nesting period.	No potentially suitable habitat observed within the ESA. Impacts to this species and its habitat are not anticipated. Concurrence from ODNR regarding lack of suitable habitat was received on April 29, 2022.
Lark sparrow ( <i>Chondestes grammacus</i> )	Endangered	Not Listed	Breed in open grassy habitats with scattered trees and shrubs including orchards, fallow fields, open woodlands, and grasslands.	No	ODNR has recommended that potential nesting habitat be avoided during the May 1 <sup>st</sup> to July 31 <sup>st</sup> nesting period.	
Least bittern ( <i>Ixobrychus exilis</i> )	Threatened	Not Listed	Often found in freshwater or brackish marshes with tall grasses, cattails, and reeds.	No		
Northern Harrier ( <i>Circus hudsonis</i> )	Endangered	Not Listed	This species is occasionally known to breed in large marshes and grasslands.	No	ODNR has recommended that potential nesting habitat be avoided during the April 15 <sup>th</sup> to July 31 <sup>st</sup> nesting period.	
Sandhill crane ( <i>Grus canadensis</i> )	Threatened	Not Listed	Breed and forage in open prairies, grasslands, and wetlands. Outside of the breeding season, they often roost in deeper water of ponds or lakes, where they are safe from predators	No	ODNR has recommended that potential nesting habitat be avoided during the April 15 <sup>st</sup> to August 31 <sup>st</sup> nesting period.	
Upland sandpiper ( <i>Bartramia longicauda</i> )	Endangered	Not Listed	Nesting habitat is provided in grasslands, pastures, and old-field areas.	No	ODNR has recommended that potential nesting habitat be avoided during the April 15 <sup>th</sup> to July 31 <sup>st</sup> nesting period.	



## 5 SUMMARY

WSP ecologists conducted environmental surveys of the Poth Substation and Transmission Line Project on July 8, 2021 and March 30, 2022. Two man-made detention basins totaling 0.31 acre were delineated by WSP ecologists within the 19.85-acre ESA. The identified detention basins appear to be man-made open water features that were excavated in upland soils and primarily fed from stormwater runoff from the surrounding commercial and industrial land uses. Therefore, will likely be considered non-jurisdictional by the USACE. The results discussed in this report are confined to the ESA limits described in earlier sections and depicted on Figure 3 (Appendix A).

Based on observations within the ESA during environmental surveys, USFWS comments, and ODNR comments, potential impacts to the Indiana bat and northern long-eared bat are not anticipated if the recommended seasonal clearing dates are utilized. Minimal forested areas that would typically provide potential summer roost habitat for bat species, were located within the ESA, and it is recommended that any tree clearing activity occurs within the clearing window (October 1st – March 31<sup>st</sup>), to limit the potential impact to bat species and their summer habitat. Additionally, no potential hibernaculum were identified within the ESA or in the vicinity of the ESA, during the environmental surveys on July 8, 2021 and March 30, 2022.

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

No potential habitat of any state- or federally-listed bird species were identified within the ESA during the environmental field surveys. Concurrence from ODNR regarding the lack of state-listed bird species was received on April 29, 2022 and is included in in Appendix D. Therefore, no adverse effects to these species or their habitat is expected to occur.



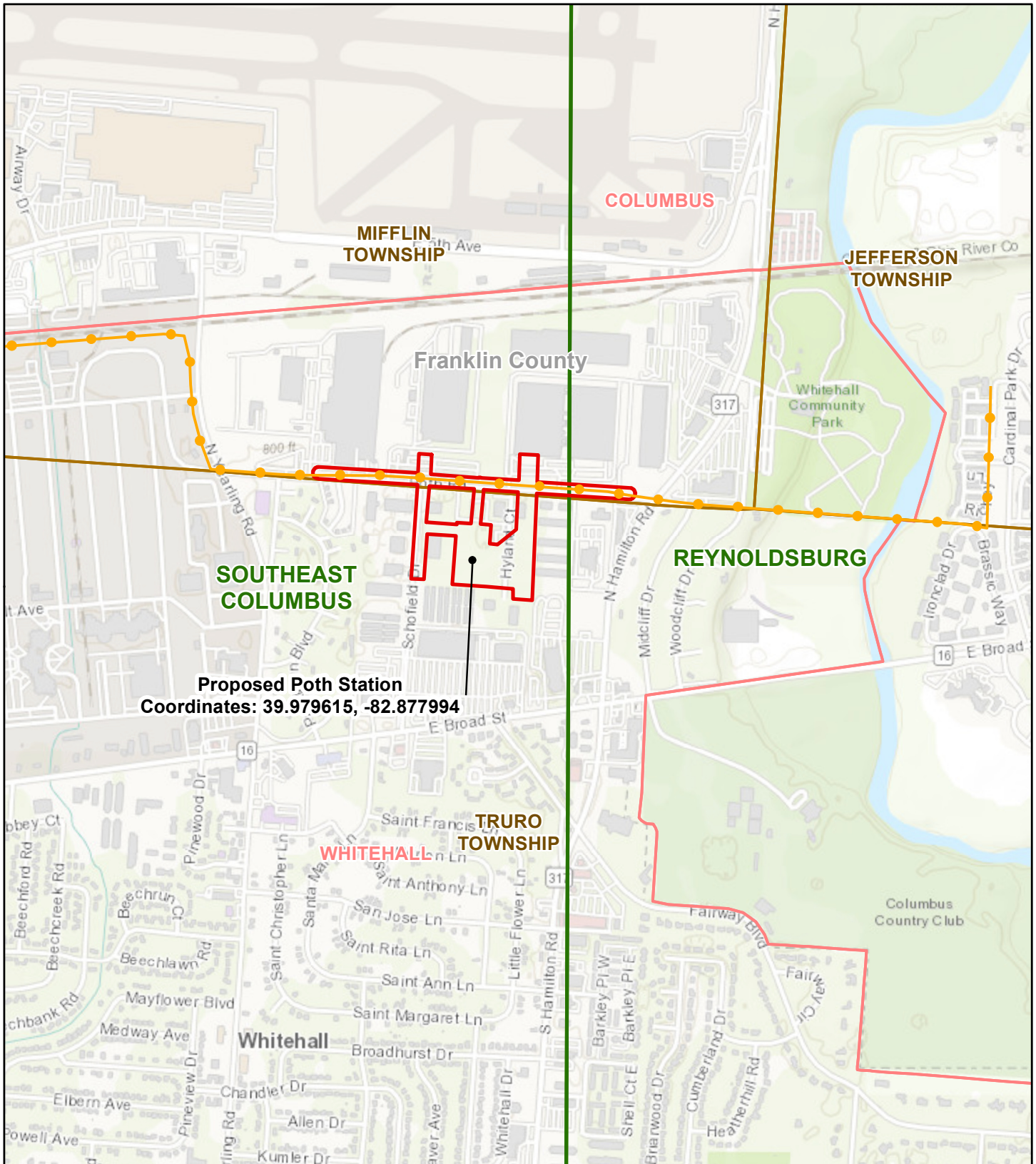


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# APPENDIX

## A FIGURES



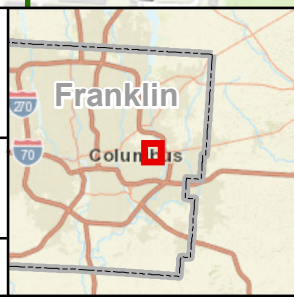
**Proposed Poth Station**  
**Coordinates: 39.979615, -82.877994**

Legend	
Existing East Broad Street 138 kV Transmission Line	County Boundary
Approximate Environmental Survey Area	Township Boundary
USGS 24k Topo Quad Boundary	Municipal Boundary

Sources:  
 Topo (USGS)  
 Quad Boundaries (USGS)

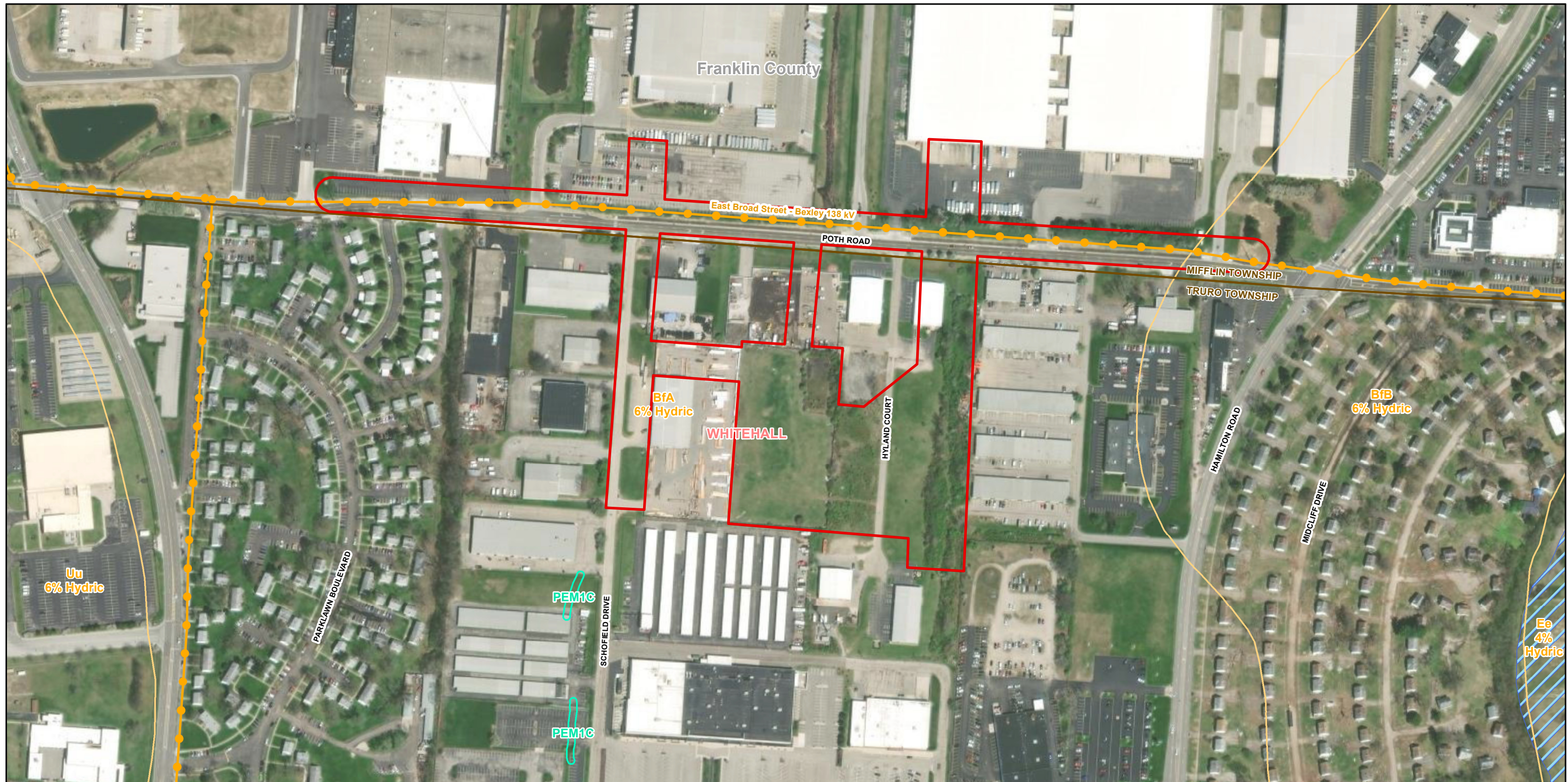
Coordinate System:  
 State Plane Ohio South  
 NAD 1983

August 15, 2023



Poth Substation and Transmission Line Project  
**Figure 1. Project Location Map**

0 0.1 0.2 Miles



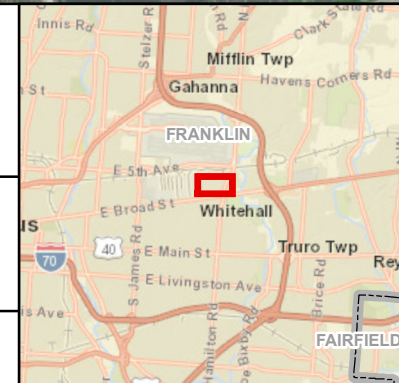
- Approximate Environmental Survey Area
- NHD Stream
- Municipal Boundary
- Existing 138 kV Transmission Line
- NHD Waterbody
- Township Boundary
- NWI Wetlands
- County Boundary
- Soil Map Unit
- FEMA 100-Yr Floodplain
- FEMA Floodway

Page 1 of 1

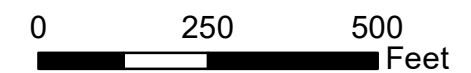
Sources:  
 Imagery (OSIP), Roads (ODOT 2020)  
 Hydrography (NHD), Wetlands (NWI)  
 Soils (USDA-NRCS), Floodplain (FEMA)

Coordinate System:  
 State Plane Ohio South  
 NAD 1983

August 15, 2023



Poth Substation and  
 Transmission Line Project  
**Figure 2. Environmental Basemap**



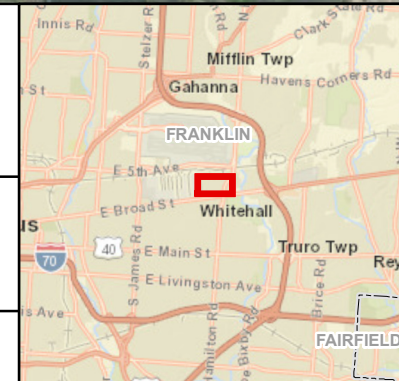


- Existing 138 kV Transmission Line
- Delineated Pond
- Upland Data Point
- Culvert
- Stormwater Inlet
- Municipal Boundary
- Township Boundary
- County Boundary

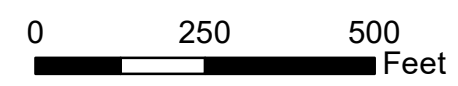
Sources:  
Imagery (OSIP),  
Roads (ODOT 2020)

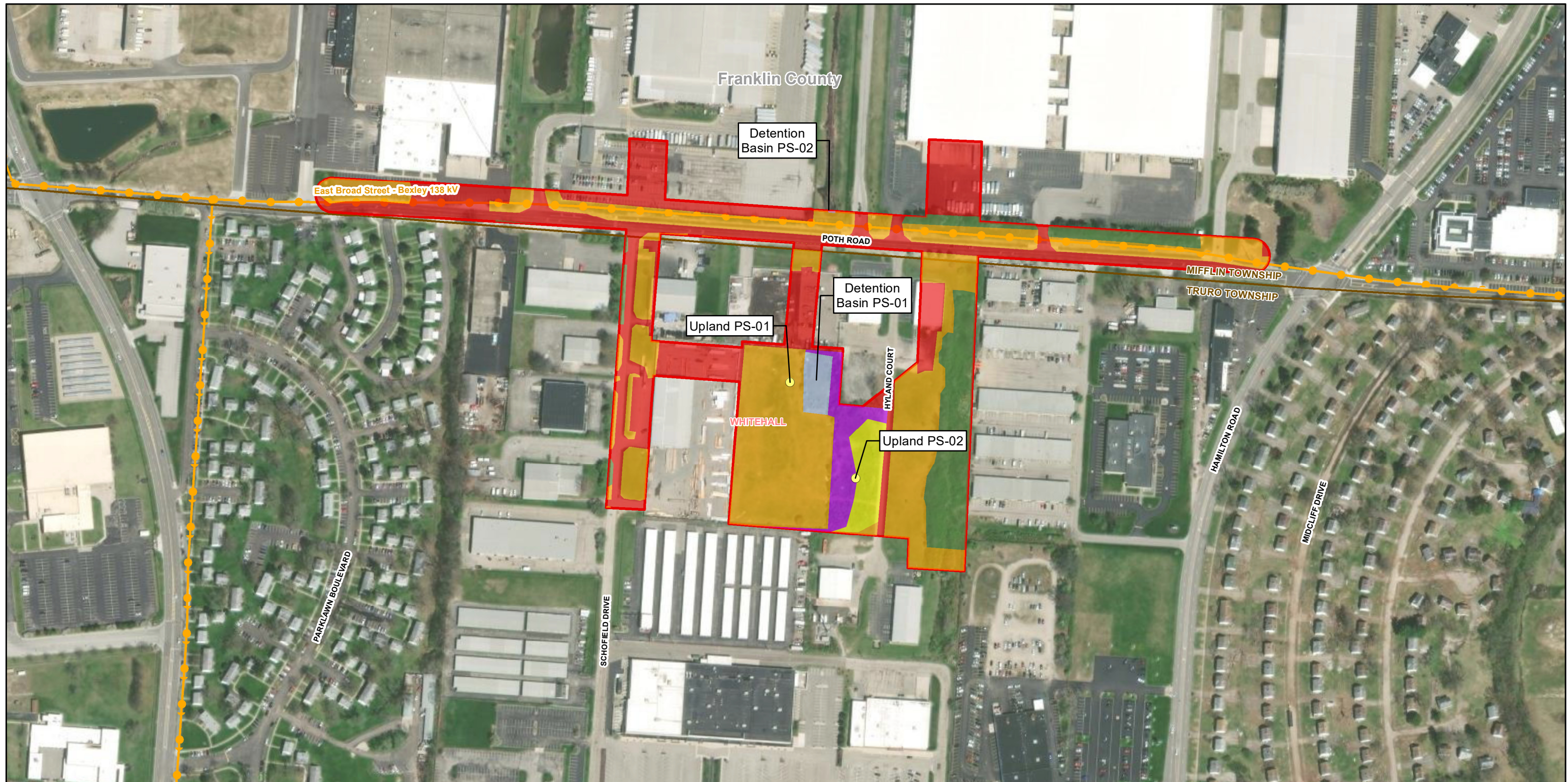
Coordinate System:  
State Plane Ohio South  
NAD 1983

August 15, 2023



Poth Substation and  
Transmission Line Project  
**Figure 3. Delineated Features**



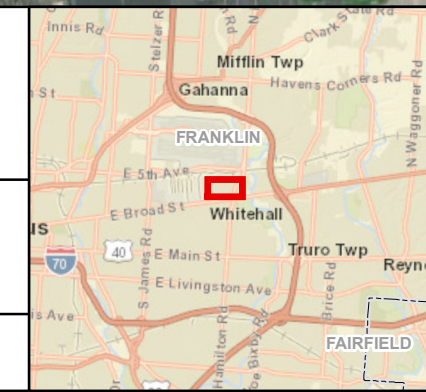


- Approximate Environmental Survey Area
- Existing 138 kV Transmission Line
- Upland Point
- Municipal Boundary
- Township Boundary
- County Boundary
- Developed - High Intensity
- Developed - Open Space
- Old Field
- Scrub - Shrub
- Successional Hardwood Woodlands
- Wetlands and Waterbodies

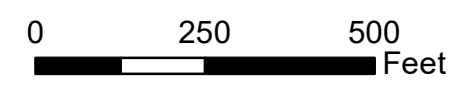
Sources:  
Imagery (OSIP),  
Roads (ODOT 2020)

Coordinate System:  
State Plane Ohio South  
NAD 1983

August 15, 2023



Poth Substation and  
Transmission Line Project  
**Figure 4. Vegetation Coverage**



# APPENDIX

## **B** USACE WETLAND DETERMINATION FORMS – MIDWEST REGION

## WETLAND DETERMINATION DATA FORM – Midwest Region

Project/Site: Poth Station City/County: Franklin County, OH Sampling Date: 7/8/2021  
 Applicant/Owner: AEP State: OH Sampling Point: Upland PS-1  
 Investigator(s): B. Rolfes, P. Renner Section, Township, Range: S4 T12N R21W  
 Landform (hillside, terrace, etc.): Terrace Local relief (concave, convex, none): none  
 Slope (%): 1 Lat: 39.980147 Long: -82.877936 Datum: WGS1984  
 Soil Map Unit Name: Bennington-Urban land complex, 0 to 2 percent slopes NWI classification: NA

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No      (If no, explain in Remarks.)  
 Are Vegetation     , Soil     , or Hydrology      significantly disturbed? Are "Normal Circumstances" present? Yes      No       
 Are Vegetation     , Soil     , or Hydrology      naturally problematic? (If needed, explain any answers in Remarks.)

### SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <u>    </u> No <u>X</u> Hydric Soil Present? Yes <u>    </u> No <u>X</u> Wetland Hydrology Present? Yes <u>    </u> No <u>X</u>	<b>Is the Sampled Area within a Wetland?</b> Yes <u>    </u> No <u>X</u>
Remarks:	

### VEGETATION – Use scientific names of plants.

Tree Stratum	(Plot size: <u>r=30'</u> )	Absolute % Cover	Dominant Species?	Indicator Status																																	
1.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<b>Dominance Test worksheet:</b> Number of Dominant Species That Are OBL, FACW, or FAC: <u>    1    </u> (A) Total Number of Dominant Species Across All Strata: <u>    2    </u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>    50.0%    </u> (A/B)																																
2.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
3.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
4.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
5.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
<u>    </u> = Total Cover																																					
Sapling/Shrub Stratum	(Plot size: <u>r=15'</u> )				<b>Prevalence Index worksheet:</b> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: right;">Total % Cover of:</td> <td></td> <td style="text-align: right;">Multiply by:</td> <td></td> </tr> <tr> <td>OBL species</td> <td style="text-align: center;"><u>    0    </u></td> <td>x 1 =</td> <td style="text-align: center;"><u>    0    </u></td> </tr> <tr> <td>FACW species</td> <td style="text-align: center;"><u>    10    </u></td> <td>x 2 =</td> <td style="text-align: center;"><u>    20    </u></td> </tr> <tr> <td>FAC species</td> <td style="text-align: center;"><u>    45    </u></td> <td>x 3 =</td> <td style="text-align: center;"><u>    135    </u></td> </tr> <tr> <td>FACU species</td> <td style="text-align: center;"><u>    30    </u></td> <td>x 4 =</td> <td style="text-align: center;"><u>    120    </u></td> </tr> <tr> <td>UPL species</td> <td style="text-align: center;"><u>    5    </u></td> <td>x 5 =</td> <td style="text-align: center;"><u>    25    </u></td> </tr> <tr> <td>Column Totals:</td> <td style="text-align: center;"><u>    90    </u> (A)</td> <td></td> <td style="text-align: center;"><u>    300    </u> (B)</td> </tr> <tr> <td colspan="2">Prevalence Index = B/A =</td> <td></td> <td style="text-align: center;"><u>    3.33    </u></td> </tr> </table>	Total % Cover of:		Multiply by:		OBL species	<u>    0    </u>	x 1 =	<u>    0    </u>	FACW species	<u>    10    </u>	x 2 =	<u>    20    </u>	FAC species	<u>    45    </u>	x 3 =	<u>    135    </u>	FACU species	<u>    30    </u>	x 4 =	<u>    120    </u>	UPL species	<u>    5    </u>	x 5 =	<u>    25    </u>	Column Totals:	<u>    90    </u> (A)		<u>    300    </u> (B)	Prevalence Index = B/A =			<u>    3.33    </u>
Total % Cover of:		Multiply by:																																			
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FACW species	<u>    10    </u>	x 2 =	<u>    20    </u>																																		
FAC species	<u>    45    </u>	x 3 =	<u>    135    </u>																																		
FACU species	<u>    30    </u>	x 4 =	<u>    120    </u>																																		
UPL species	<u>    5    </u>	x 5 =	<u>    25    </u>																																		
Column Totals:	<u>    90    </u> (A)		<u>    300    </u> (B)																																		
Prevalence Index = B/A =			<u>    3.33    </u>																																		
1.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
2.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
3.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
4.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
5.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
<u>    </u> = Total Cover																																					
Herb Stratum	(Plot size: <u>r=5'</u> )				<b>Hydrophytic Vegetation Indicators:</b> <u>    </u> 1 - Rapid Test for Hydrophytic Vegetation <u>    </u> 2 - Dominance Test is >50% <u>    </u> 3 - Prevalence Index is ≤3.0 <sup>1</sup> <u>    </u> 4 - Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet) <u>    </u> Problematic Hydrophytic Vegetation <sup>1</sup> (Explain) <sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.																																
1.	<u>Poa pratensis</u>	45	Yes	FAC																																	
2.	<u>Phragmites australis</u>	10	No	FACW																																	
3.	<u>Daucus carota</u>	5	No	UPL																																	
4.	<u>Trifolium repens</u>	15	Yes	FACU																																	
5.	<u>Solidago altissima</u>	10	No	FACU																																	
6.	<u>Plantago lanceolata</u>	5	No	FACU																																	
7.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
8.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
9.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
10.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
<u>    90    </u> = Total Cover																																					
Woody Vine Stratum	(Plot size: <u>r=30'</u> )				<b>Hydrophytic Vegetation Present?</b> Yes <u>    </u> No <u>X</u>																																
1.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
2.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>																																	
<u>    </u> = Total Cover																																					
Remarks: (Include photo numbers here or on a separate sheet.)																																					



**SOIL**

Sampling Point: Upland PS-1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0-16	10YR 4/4	100					Loamy/Clayey	

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

<sup>2</sup>Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators:**

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1)
- 5 cm Mucky Peat or Peat (S3)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)
- Dark Surface (S7)
- Loamy Mucky Mineral (F1)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)

**Indicators for Problematic Hydric Soils<sup>3</sup>:**

- Coast Prairie Redox (A16)
- Iron-Manganese Masses (F12)
- Red Parent Material (F21)
- Very Shallow Dark Surface (F22)
- Other (Explain in Remarks)

<sup>3</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if observed):**

Type: \_\_\_\_\_  
Depth (inches): \_\_\_\_\_

**Hydric Soil Present?** Yes \_\_\_\_\_ No X

**Remarks:**

This data form is revised from Midwest Regional Supplement Version 2.0 to include the NRCS Field Indicators of Hydric Soils, Version 7.0, 2015 Errata. ([http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/nrcs142p2\\_051293.docx](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_051293.docx))

**HYDROLOGY**

**Wetland Hydrology Indicators:**

Primary Indicators (minimum of one is required; check all that apply)

- Surface Water (A1)
- High Water Table (A2)
- Saturation (A3)
- Water Marks (B1)
- Sediment Deposits (B2)
- Drift Deposits (B3)
- Algal Mat or Crust (B4)
- Iron Deposits (B5)
- Inundation Visible on Aerial Imagery (B7)
- Sparsely Vegetated Concave Surface (B8)
- Water-Stained Leaves (B9)
- Aquatic Fauna (B13)
- True Aquatic Plants (B14)
- Hydrogen Sulfide Odor (C1)
- Oxidized Rhizospheres on Living Roots (C3)
- Presence of Reduced Iron (C4)
- Recent Iron Reduction in Tilled Soils (C6)
- Thin Muck Surface (C7)
- Gauge or Well Data (D9)
- Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- Surface Soil Cracks (B6)
- Drainage Patterns (B10)
- Dry-Season Water Table (C2)
- Crayfish Burrows (C8)
- Saturation Visible on Aerial Imagery (C9)
- Stunted or Stressed Plants (D1)
- Geomorphic Position (D2)
- FAC-Neutral Test (D5)

**Field Observations:**

Surface Water Present? Yes \_\_\_\_\_ No X Depth (inches): \_\_\_\_\_  
 Water Table Present? Yes \_\_\_\_\_ No X Depth (inches): \_\_\_\_\_  
 Saturation Present? Yes \_\_\_\_\_ No X Depth (inches): \_\_\_\_\_  
 (includes capillary fringe)

**Wetland Hydrology Present?** Yes \_\_\_\_\_ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

**Remarks:**

## WETLAND DETERMINATION DATA FORM – Midwest Region

Project/Site: Poth Station City/County: Franklin County, OH Sampling Date: 3/30/2022  
 Applicant/Owner: AEP State: OH Sampling Point: Upland PS-2  
 Investigator(s): B. Rolfes, P. Renner Section, Township, Range: S4 T12N R21W  
 Landform (hillside, terrace, etc.): Plain Local relief (concave, convex, none): none  
 Slope (%): 1 Lat: 39.9794 Long: -82.8773 Datum: WGS1984  
 Soil Map Unit Name: Bennington-Urban land complex, 0 to 2 percent slopes NWI classification: NA

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No      (If no, explain in Remarks.)  
 Are Vegetation     , Soil     , or Hydrology      significantly disturbed? Are "Normal Circumstances" present? Yes X No       
 Are Vegetation     , Soil     , or Hydrology      naturally problematic? (If needed, explain any answers in Remarks.)

### SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <u>    </u> No <u>X</u> Hydric Soil Present? Yes <u>    </u> No <u>X</u> Wetland Hydrology Present? Yes <u>    </u> No <u>X</u>	<b>Is the Sampled Area within a Wetland?</b> Yes <u>    </u> No <u>X</u>
Remarks:	

### VEGETATION – Use scientific names of plants.

Tree Stratum	(Plot size: <u>r=30'</u> )	Absolute % Cover	Dominant Species?	Indicator Status																	
1.	_____	_____	_____	_____	<b>Dominance Test worksheet:</b> Number of Dominant Species That Are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>50.0%</u> (A/B)																
2.	_____	_____	_____	_____																	
3.	_____	_____	_____	_____																	
4.	_____	_____	_____	_____																	
5.	_____	_____	_____	_____																	
		=Total Cover																			
Sapling/Shrub Stratum	(Plot size: <u>r=15'</u> )				<b>Prevalence Index worksheet:</b> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Total % Cover of:</th> <th style="width: 50%;">Multiply by:</th> </tr> </thead> <tbody> <tr> <td>OBL species <u>0</u></td> <td>x 1 = <u>0</u></td> </tr> <tr> <td>FACW species <u>0</u></td> <td>x 2 = <u>0</u></td> </tr> <tr> <td>FAC species <u>70</u></td> <td>x 3 = <u>210</u></td> </tr> <tr> <td>FACU species <u>25</u></td> <td>x 4 = <u>100</u></td> </tr> <tr> <td>UPL species <u>0</u></td> <td>x 5 = <u>0</u></td> </tr> <tr> <td>Column Totals: <u>95</u> (A)</td> <td><u>310</u> (B)</td> </tr> <tr> <td colspan="2">Prevalence Index = B/A = <u>3.26</u></td> </tr> </tbody> </table>	Total % Cover of:	Multiply by:	OBL species <u>0</u>	x 1 = <u>0</u>	FACW species <u>0</u>	x 2 = <u>0</u>	FAC species <u>70</u>	x 3 = <u>210</u>	FACU species <u>25</u>	x 4 = <u>100</u>	UPL species <u>0</u>	x 5 = <u>0</u>	Column Totals: <u>95</u> (A)	<u>310</u> (B)	Prevalence Index = B/A = <u>3.26</u>	
Total % Cover of:	Multiply by:																				
OBL species <u>0</u>	x 1 = <u>0</u>																				
FACW species <u>0</u>	x 2 = <u>0</u>																				
FAC species <u>70</u>	x 3 = <u>210</u>																				
FACU species <u>25</u>	x 4 = <u>100</u>																				
UPL species <u>0</u>	x 5 = <u>0</u>																				
Column Totals: <u>95</u> (A)	<u>310</u> (B)																				
Prevalence Index = B/A = <u>3.26</u>																					
1.	<u>Gleditsia triacanthos</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>																	
2.	<u>Rosa multiflora</u>	<u>5</u>	<u>Yes</u>	<u>FACU</u>																	
3.	_____	_____	_____	_____																	
4.	_____	_____	_____	_____																	
5.	_____	_____	_____	_____																	
		=Total Cover																			
Herb Stratum	(Plot size: <u>r=5'</u> )				<b>Hydrophytic Vegetation Indicators:</b> <u>    </u> 1 - Rapid Test for Hydrophytic Vegetation <u>    </u> 2 - Dominance Test is >50% <u>    </u> 3 - Prevalence Index is ≤3.0 <sup>1</sup> <u>    </u> 4 - Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet) <u>    </u> Problematic Hydrophytic Vegetation <sup>1</sup> (Explain) <sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.																
1.	<u>Poa pratensis</u>	<u>40</u>	<u>Yes</u>	<u>FAC</u>																	
2.	<u>Xanthium strumarium</u>	<u>25</u>	<u>Yes</u>	<u>FAC</u>																	
3.	<u>Dactylis glomerata</u>	<u>15</u>	<u>No</u>	<u>FACU</u>																	
4.	<u>Apocynum cannabinum</u>	<u>5</u>	<u>No</u>	<u>FAC</u>																	
5.	_____	_____	_____	_____																	
6.	_____	_____	_____	_____																	
7.	_____	_____	_____	_____																	
8.	_____	_____	_____	_____																	
9.	_____	_____	_____	_____																	
10.	_____	_____	_____	_____																	
		=Total Cover																			
Woody Vine Stratum	(Plot size: <u>r=30'</u> )				<b>Hydrophytic Vegetation Present?</b> Yes <u>    </u> No <u>X</u>																
1.	_____	_____	_____	_____																	
2.	_____	_____	_____	_____																	
		=Total Cover																			
Remarks: (Include photo numbers here or on a separate sheet.)																					

**SOIL**

Sampling Point: Upland PS-2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0-12	10YR 3/3	100					Loamy/Clayey	

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

<sup>2</sup>Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:	Indicators for Problematic Hydric Soils <sup>3</sup> :
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Coast Prairie Redox (A16)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Iron-Manganese Masses (F12)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Red Parent Material (F21)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Very Shallow Dark Surface (F22)
<input type="checkbox"/> Stratified Layers (A5)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> 2 cm Muck (A10)	
<input type="checkbox"/> Depleted Below Dark Surface (A11)	
<input type="checkbox"/> Thick Dark Surface (A12)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	
<input type="checkbox"/> 5 cm Mucky Peat or Peat (S3)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	
<input type="checkbox"/> Sandy Redox (S5)	
<input type="checkbox"/> Stripped Matrix (S6)	
<input type="checkbox"/> Dark Surface (S7)	
<input type="checkbox"/> Loamy Mucky Mineral (F1)	
<input type="checkbox"/> Loamy Gleyed Matrix (F2)	
<input type="checkbox"/> Depleted Matrix (F3)	
<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Redox Depressions (F8)	

<sup>3</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

<b>Restrictive Layer (if observed):</b> Type: _____ Depth (inches): _____	<b>Hydric Soil Present?</b> Yes _____ No <u>X</u>
---	---

Remarks:  
No indicators of Hydric Soils.

**HYDROLOGY**

Wetland Hydrology Indicators:	
Primary Indicators (minimum of one is required; check all that apply)	Secondary Indicators (minimum of two required)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Fauna (B13)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> True Aquatic Plants (B14)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Presence of Reduced Iron (C4)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Thin Muck Surface (C7)
	<input type="checkbox"/> Gauge or Well Data (D9)
	<input type="checkbox"/> Other (Explain in Remarks)
	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
	<input type="checkbox"/> Stunted or Stressed Plants (D1)
	<input type="checkbox"/> Geomorphic Position (D2)
	<input type="checkbox"/> FAC-Neutral Test (D5)

<b>Field Observations:</b> Surface Water Present?    Yes _____    No <u>X</u> Depth (inches): _____ Water Table Present?      Yes _____    No <u>X</u> Depth (inches): _____ Saturation Present?        Yes _____    No <u>X</u> Depth (inches): _____ (includes capillary fringe)	<b>Wetland Hydrology Present?</b> Yes _____    No <u>X</u>
--	--

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:  
No indicators of Wetland Hydrology.

# APPENDIX

## C REPRESENTATIVE PHOTOGRAPHS

**POTH SUBSTATION AND TRANSMISSION LINE PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 1**



Detention Basin PS-01 facing east on July 8, 2021.

**PHOTOGRAPH 2**



Detention Basin PS-01 facing north on July 8, 2021.

**POTH SUBSTATION AND TRANSMISSION LINE PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 3**



Detention Basin PS-01 (stormwater inlet) facing northeast on July 8, 2021.

**PHOTOGRAPH 4**



Detention Basin PS-02 facing west on July 8, 2021.

**POTH SUBSTATION AND TRANSMISSION LINE PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 5**



Detention Basin PS-02 facing northwest on July 8, 2021.

**PHOTOGRAPH 6**



Upland PS-01 facing north on July 8, 2021.

**POTH SUBSTATION AND TRANSMISSION LINE PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 7**



Upland PS-01 facing south on July 8, 2021.

**PHOTOGRAPH 8**



Upland PS-02 facing north on March 30, 2022.



**POTH SUBSTATION AND TRANSMISSION LINE PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 9**



Upland PS-02 facing south on March 30, 2022.

**PHOTOGRAPH 10**



Developed, High Intensity Land use, facing west on March 30, 2022.

**POTH SUBSTATION AND TRANSMISSION LINE PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 11**



Developed – Open Space and Successional Hardwood Forest habitat beyond, facing northeast on March 30, 2022.

**PHOTOGRAPH 12**



Scrub-Shrub habitat, facing east on March 30, 2022.

PHOTOGRAPH 13



Old Field habitat, facing north on March 30, 2022.

# APPENDIX

## D AGENCY COORDINATION

## Rolfes, Brad

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**From:** Ohio, FW3 <ohio@fws.gov>  
**Sent:** Monday, August 9, 2021 12:06 PM  
**To:** Rolfes, Brad  
**Cc:** nathan.reardon@dnr.state.oh.us; Parsons, Kate; Thomayer, Matthew; mrhall@aep.com  
**Subject:** AEP Poth Substation and Transmission Line Project, Franklin County Ohio



TAILS# 03E15000-2021-TA-1857

Dear Mr. Rolfes,

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees  $\geq 3$  inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, we recommend removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and

conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

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

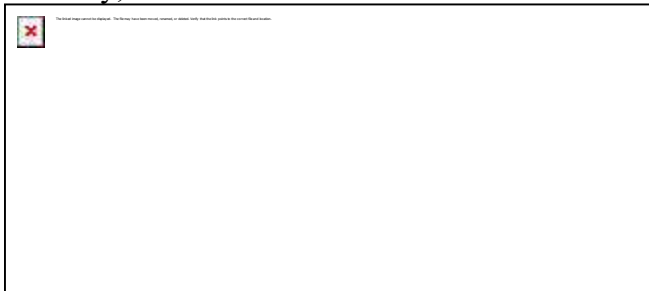
Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio ([https://epa.ohio.gov/portals/47/facts/ohio\\_wetlands.pdf](https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf)). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at [mike.pettegrew@dnr.state.oh.us](mailto: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](mailto:ohio@fws.gov).

Sincerely,



Patrice M. Ashfield  
Field Office Supervisor

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



# Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

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

September 9, 2021

Brad Rolfes  
WSP USA Inc.  
312 Elm Street, Suite 2500  
Cincinnati, Ohio 45202

**Re:** 21-0749; Poth Substation and Transmission Line Project

**Project:** The proposed project involves construction of the proposed Poth Substation, removal of approximately 0.35-miles of the existing East Broad Street - Bexley 138 kV Transmission Line, and the construction of two new 138 kV lines.

**Location:** The proposed project is located in the City of Whitehall, Franklin County Ohio.

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

**Natural Heritage Database:** The Natural Heritage Database has no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. 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.

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

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

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

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH  $\geq$  20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the “OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING”. If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Erin Hazelton at [Erin.hazelton@dnr.ohio.gov](mailto:Erin.hazelton@dnr.ohio.gov)).

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Erin Hazelton for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

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

State Threatened

black sandshell (*Ligumia recta*)  
fawnsfoot (*Truncilla donaciformis*)  
pondhorn (*Unio merus tetralasmus*)  
threehorn wartyback (*Obliquaria reflexa*)



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

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

Federally Endangered

Scioto madtom (*Noturus trautmani*)

State Endangered

goldeye (*Hiodon alosoides*)

Iowa darter (*Etheostoma exile*)

popeye shiner (*Notropis ariommus*)

northern brook lamprey (*Ichthyomyzon fossor*)

spotted darter (*Etheostoma maculatum*)

shortnose gar (*Lepisosteus platostomus*)

tonguetied minnow (*Exoglossum laurae*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)

paddlefish (*Polyodon spathula*)

Tippecanoe darter (*Etheostoma tippecanoe*)

The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black-crowned night-heron (*Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 15 through August 15. If no wetland habitat will be impacted, the 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. 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 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the sandhill crane (*Grus canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

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

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

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

[http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List\\_8\\_16.pdf](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 Mike Pettegrew at [mike.pettegrew@dnr.ohio.gov](mailto:mike.pettegrew@dnr.ohio.gov) if you have questions about these comments or need additional information.

Mike Pettegrew  
Environmental Services Administrator (Acting)

Rolfes, Brad

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From: Nathan.Reardon@dnr.ohio.gov  
Sent: Friday, April 29, 2022 9:39 AM  
To: Rolfes, Brad  
Cc: Thomayer, Matthew; Mia R Hall  
Subject: RE: 21-0749; AEP Poth Station and Transmission Line Project; Habitat Assessment

Follow Up Flag: Follow up  
Flag Status: Flagged

Hi Brad,

The DOW concurs that nesting of the eight species of state listed birds within or adjacent to the project area is unlikely. Therefore, seasonal construction restrictions are not necessary. No further coordination is necessary.

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](mailto:nathan.reardon@dnr.ohio.gov)

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From: Rolfes, Brad <Brad.Rolfes@wsp.com>  
Sent: Tuesday, April 19, 2022 2:45 PM  
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>  
Cc: Thomayer, Matthew <matt.thomayer@wsp.com>; Mia R Hall <mrhall@aep.com>  
Subject: 21-0749; AEP Poth Station and Transmission Line Project; Habitat Assessment

Hi Nathan,

AEP is proposing the Poth Substation and Transmission Line Project in Mifflin and Truro Townships, Franklin County, Ohio, as shown in Figure 1 (attached). The Project involves the construction of a new greenfield distribution substation and two 138 kV lines from the Proposed Poth station to the existing E. Broad St. Bexley 138 kV line.

The attached environmental review (21-0749) for the project was provided by ODNR, dated September 9, 2021. The environmental review indicated that the Project is within range of the eight state-listed bird species [American bittern (*Botaurus lentiginosus*), black-crowned night-heron (*Nycticorax nycticorax*), cattle egret (*Bubulcus ibis*), lark sparrow (*Chondestes grammacus*), least bittern (*Ixobrychus exilis*), northern harrier (*Circus cyaneus*), sandhill crane (*Grus canadensis*), and upland sandpiper (*Bartramia longicauda*)].

The habitat within and around the Project area primarily consists of developed land uses (High-Intensity and Open Space) that are routinely mowed and/or managed; and to a lesser extent, Scrub Shrub, Old Field, and Successional Hardwood Forest, as shown in Figure 4 (attached). WSP completed a survey for potential habitat for the eight species and concluded that the Environmental Survey Area (ESA) does not provide suitable nesting habitat for any of the identified state-listed species and impacts to these species are not anticipated, due to proposed Project activities. To assist with this request, I have attached examples of representative habitat on site and a zipped folder containing Shapefiles and a Google Earth KMZ of the Project Area, for your reference.

We request your concurrence with our findings and with WSP's opinion that seasonal construction restrictions associated with these eight species are not necessary for the Project and that presence/absence surveys within the ESA are not warranted. Please let me know if you have any questions or if any additional information is required. I appreciate your time and look forward to hearing from you.

Thank you,  
Brad Rolfes



**Bradley J. Rolfes**

Environmental Scientist  
CNRP (Certified Natural Resource Professional)  
*He / Him / His*

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Commission of Ohio Docketing Information System on  
9/19/2023 11:39:43 AM**

**in**

**Case No(s). 23-0851-EL-BNR**

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