

Construction Notice Harrison Extension 138 kV Pole Replacement Project



An **AEP** Company

PUCO Case No. 23-0919-EL-BNR

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

Submitted by:
Ohio Power Company

October 5, 2023

Construction Notice for Harrison Extension 138 kV Pole Replacement Project

Construction Notice

Ohio Power Company Harrison Extension 138 kV Pole Replacement Project

4906-6-05

Ohio Power Company (the “Company”) provides the following information to the Ohio Power Siting Board (“OPSB”) pursuant to Ohio Administrative Code Section 4906-6-05.

4906-6-05(B) General Information

B(1) Project Description

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

The Company proposes to construct the Harrison 138 kV Extension Pole Replacement Project (the “Project”) in the Village of Obetz in Franklin County, Ohio. The Project required the replacement of one H-frame, wood pole structure with an approximately 20-foot taller wood, H-frame structure. The Project is within the existing right-of-way (ROW) of the 138 kV transmission line, and no additional ROW is required. The location of the replaced structure (the “Project Area”) is shown on Figures 1 and 2 in Appendix A.

The Project meets the requirements for a CN because it is within the types of projects defined by item (2) (a) of Ohio Administrative Code Section 4906-1-01 Appendix A of the Application Requirement Matrix For Electric Power Transmission Lines:

- (2) 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 PUCO Case No. 23-0919-EL-BNR.

B(2) Statement of Need

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

The Project is required to ensure proper operating clearances on the existing transmission line. Failure to construct the Project is expected to result in portions of the line not meeting clearance requirements and potentially creating operational constraints under certain load conditions. The Project’s proposal to raise one structure will mitigate these risks. Due to the urgency for repair, construction was completed prior to approval of this Construction Notice.

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As this Project results in no operational, modeling, or topology changes, the Project will not be brought through the PJM M-3 process.

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 is shown in Figure 1 of Appendix A.

B(4) Alternatives Considered

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

The Project replaces one wood H-frame structure along an existing 138 kV electric transmission line. A direct, one-for-one replacement is the most suitable solution for the Project, as other alternatives would require additional or more costly structures. By replacing the structure at its current location, the proposed Project is not anticipated to impact wetlands, streams, or any known cultural resource areas eligible for the National Register of Historic Places (NRHP). Therefore, this alternative represents the most suitable location and is the most appropriate solution for meeting the Company's needs in the area.

B(5) Public Information Program

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

The 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. The Company also retains land agents who will discuss Project timelines, construction and restoration activities with affected owners and tenants.

B(6) Construction Schedule

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

The Company coordinated with OPSB staff prior to submittal. Due to potential operational concerns, construction of the Project was completed in September 2023.

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B(7) Area Map

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

Figure 1 in Appendix A provides the proposed Project area on a map of 1:24,000-scale (1 inch equals 2,000 feet), showing the Project on the United States Geological Survey (USGS) 7.5-minute topographic map of the Lockbourne, Ohio quadrangle. Figure 2 in Appendix A shows the Project Area on recent aerial photography, dated 2022, as provided by ESRI World Imagery at a scale of 1:6,000 scale (1 inch equals 500 feet).

To visit the Project site from Columbus, Ohio, take I-71 South approximately 4.4 miles to I-270 East. After 5.9 miles, take Exit 49 for Alum Creek Drive toward Obetz. Merge onto Alum Creek Drive and continue 1.3 miles before turning right onto Creekside Parkway. Continue for 1.0 mile and turn left onto Rohr Road. The Project can be accessed from Obetz Station at 2115 Rohr Road. The structure to be replaced is located approximately 1,000 feet south of the substation (latitude 39.841269, longitude -82.946598).

B(8) Property Agreements

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

The Project is located on Parcel Number 152-001755 in Franklin County. The Project is located within the existing ROW. No additional property easements, options, or land use agreements are necessary to construct the Project.

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.

Line Asset Name:	Harrison Extension
Ownership:	Ohio Power Company
Voltage:	138 kV
Conductors:	(3) 636 kcmil ACSR 26/7 Grosbeak
Static Wire:	(1) 3#5 E.H.S Copperweld and (1) 0.66" opgw 96 fibers
Insulators:	Polymer
ROW Width:	100 feet
Structure Type:	(1) Wood, H-frame

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B(9)(b) Electric and Magnetic Fields

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

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

B(9)(c) Project Cost

The estimated capital cost of the project.

The capital cost estimate for the Project, which is comprised of applicable tangible and capital costs, is approximately \$270,000 using a Class 5 estimate. Pursuant to the PJM OATT, the costs for this Project will be recovered in the Ohio Power Company's FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Ecological Impacts

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

B(10)(a) Land Use Characteristics

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

An aerial photograph of the Project vicinity is provided as Figure 2 in Appendix A. The Project is located in the Village of Obetz in Franklin County, Ohio. Land use throughout the Project Area consists of existing electric transmission line right-of-way. Adjacent land uses include commercial/industrial warehouses.

B(10)(b) Agricultural Land Information

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

The Project is within existing electric transmission line right-of-way crossing non-agricultural land. No impacts to agricultural land are anticipated. The Franklin County Auditor indicated that the Project parcel is not registered as Agricultural District Land on October 3, 2023.

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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 a Phase I Cultural Resource Management Investigation of the Project Area. The Phase I survey included other areas not subject to OPSB review. The Company's consultant concluded that no resources that are eligible for the NRHP were identified in the Project area. The results of the report were coordinated with the Ohio Historic Preservation Office (SHPO). SHPO provided concurrence that the Project will have no adverse effect on historic properties on September 22, 2023 (see Appendix B).

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

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

A Notice of Intent is only needed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHC000006, if ground disturbance exceeds one acre. The area of disturbance is below reporting and permitting requirements for state and local stormwater permitting requirements and no permits are required. The Company will implement and maintain best management practices to minimize erosion control sediment to protect surface water quality during storm events.

Per field reviews on September 5, 2023, no streams, wetlands, or other water bodies were identified in the survey corridor. Therefore, the Project will not require a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers or a Section 401 Water Quality Certification from the OEPA. A summary report is provided in Appendix C.

The FEMA Flood Insurance Rate Map was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map number **39049C0429K**). Based on this mapping, no mapped FEMA floodplains are located in the Project Area. Therefore, no floodplain permit will be required for this Project.

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

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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.

Based on the urgency of the Project, agency coordination has not been completed to date. Rather, agency responses from the United States Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) regarding other recent projects in Franklin County were relied upon to assess potential impacts to threatened and endangered species. Recent response letters from the USFWS (see Appendix B) indicated all projects in the State of Ohio lie within range of the federally endangered Indiana bat and the federally threatened northern long-eared bat. In Ohio, presence of these species is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document probable absence. Should the Project site contain trees ≥ 3 inches diameter at breast height (dbh), the USFWS recommends trees be saved whenever possible. No caves were identified based on the review. If any caves or abandoned mines may be disturbed, further coordination is requested. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, the USFWS recommends that removal of trees ≥ 3 inches dbh only occur between October 1 and March 31 in order to avoid adverse effects to these species. If implementation of seasonal tree clearing is not possible, the USFWS recommends summer presence/absence surveys be conducted between June 1 and August 15. Additionally, the USFWS states that they do not anticipate adverse effects to any other federally endangered, threatened, proposed or candidate species due to the Project type, size, and location. Based on current USFWS Ohio Field Office guidance, a desktop evaluation of potential hibernaculum was conducted in the Project area. No hibernaculum or caves were located in the Project area based on the site reconnaissance and review of documented mines and karst features. Additionally, no tree clearing is anticipated as part of the Project. Therefore, no impacts were anticipated for the Indiana bat or northern long-eared bat.

According to recent responses for similar projects from the ODNR within 10 miles and matching the urban setting, the Project is within the vicinity of records for the Indiana bat, a state and federally endangered species; northern long-eared bat, a state-endangered and federally threatened species; little brown bat, a state-endangered species; and the tricolored bat, a state endangered species. No tree clearing is anticipated for the Project. Therefore, no additional coordination with ODNR is anticipated.

The Project is within the range of 17 endangered or threatened mussel species and 10 endangered or threatened fish species. Due to no in-water work, the Project is not likely to impact these species.

In addition, the ODNR lists the project in the range of the northern harrier, a state endangered species. Northern harriers breed in large marshes and grasslands. No potential habitat for this species was observed in the Project area. No impact on this species is anticipated.

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B(10)(f) Areas of Ecological Concern

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

No unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, or other protected natural areas were identified within the Project Area.

FEMA Flood Insurance Rate Maps were consulted to identify any floodplains/flood hazard areas that have been mapped in the Project Area (specifically, map number **39049C0429K**). Based on this mapping, no mapped FEMA floodplains are located in the Project Area. Therefore, no floodplain permit will be required for this Project.

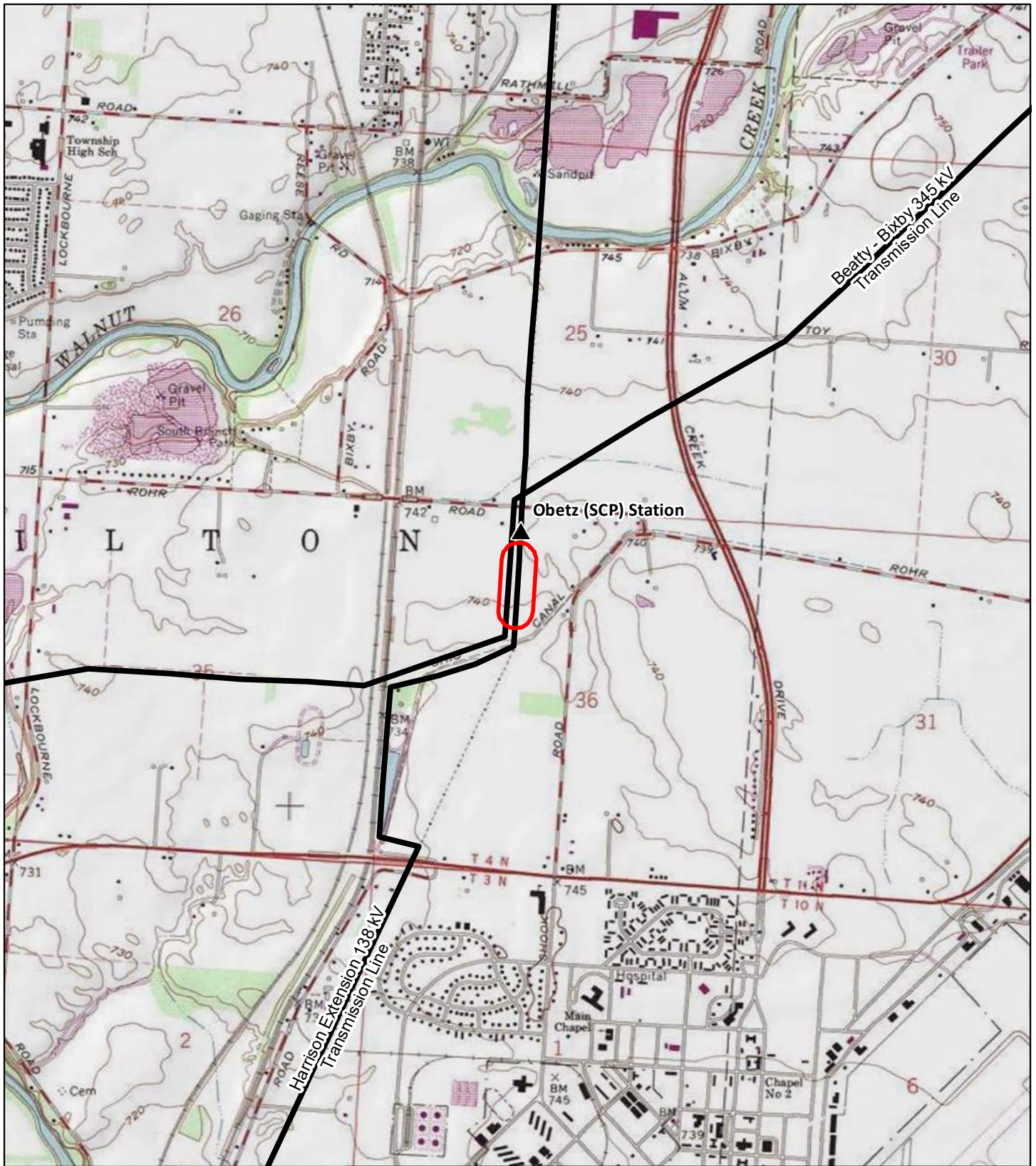
Wetland and stream delineation field surveys were completed within the Project area by the Company's consultant on September 5, 2023. No streams, wetlands, or other water bodies were identified in the survey corridor. A summary report is provided in Appendix C.

B(10)(g) Unusual Conditions

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

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

Appendix A Project Maps



Legend:

- Project Area
- Existing Station
- Existing Transmission Line

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

Ohio State Plane South NAD 1983



August 31, 2023

PROJECT LOCATION



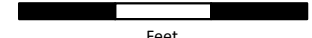
FRANKLIN COUNTY, OHIO

**FIGURE 1
TOPOGRAPHIC OVERVIEW**

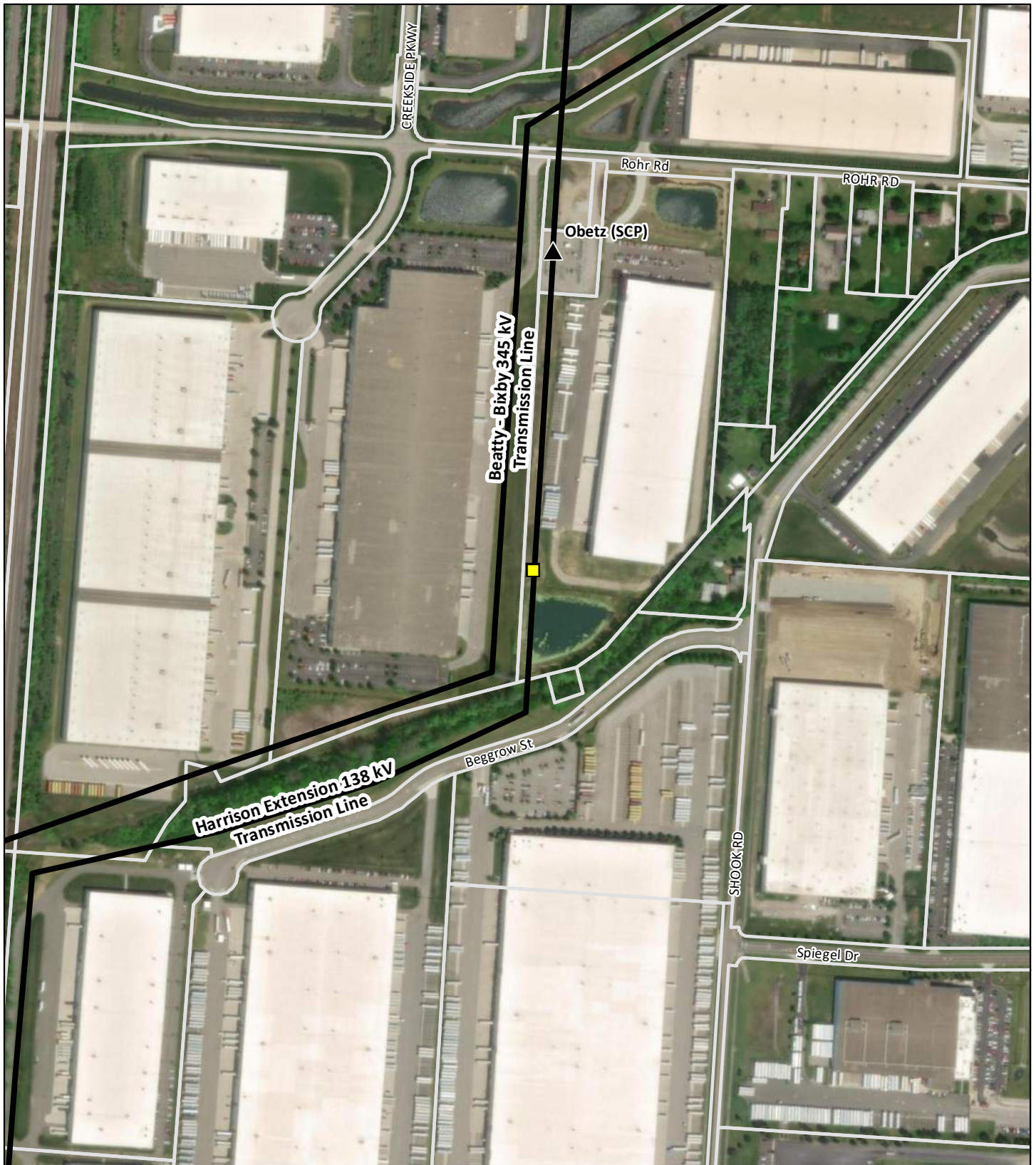


Harrison Extension 138 kV Pole Replacement Project

0 1,000 2,000 3,000



Feet



Legend:

- Proposed Structure Replacement
- Existing Substation
- Existing Transmission Line
- Parcel Boundary

Data Sources: AEP,
ESRI World Imagery, 2022

Ohio State Plane North
NAD 1983



September 28, 2023

PROJECT LOCATION

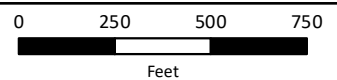


FRANKLIN COUNTY, OHIO

**FIGURE 2
PROJECT AERIAL MAP**



Harrison Extension 138 kV
Pole Replacement Project



Appendix B

Agency Coordination



In reply, refer to
2023-FRA-59139

September 22, 2023

Ryan Weller
Weller & Associates, Inc.
1395 W. Fifth Ave.
Columbus, OH 43212
rweller@wellercrm.com

RE: Harrison Extension 138kV Transmission Line Rebuild Project, Harrison Township, Pickaway County and Hamilton Township, Franklin County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received August 19, 2023 regarding the proposed Harrison Extension 138kV Transmission Line Rebuild Project, Harrison Township, Pickaway County and Hamilton Township, 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 4906-4 & 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 Approximately 1.71 km (1.07 mi) Harrison Extension 138kV Transmission Line Rebuild Project in Harrison Township, Pickaway County and Hamilton Township, Franklin County, Ohio* by Seth T. Cooper and Scott McIntosh (Weller & Associates, Inc. 2023).

A literature review, visual inspection, surface collection, and shovel test unit excavation was completed as part of the investigations. Six (6) previously identified archaeological sites are located in the project area, Ohio Archaeological Inventory (OAI) #33FR2571, 33FR2574, 33FR2583, 33FR3150, 33FR3151, and 33FR3178. OAI#33FR2571, 33FR2574, 33FR2583, 33FR3150, and 33FR3151 were all previously determined not eligible for listing in the National Register of Historic Places (NRHP). Our office continues to agree with these recommendations. OAI#33FR3178, known as the Angell Site or Caldwell #1 Site, is a large prehistoric site documented from a landowner collection. The site is recommended not eligible for listing in the NRHP. It is our office's opinion the eligibility of the site remains unknown, as only a small portion of the site was surveyed for the proposed project. While eligibility of the site remains unknown, we agree the proposed project will not affect the site. No additional archaeological survey is needed for OAI#33FR3178 unless the proposed route changes. Six (6) new archaeological sites were identified during survey, OAI#33FR3570-33FR3575. None of the sites are recommended eligible for listing in the NRHP. Our office agrees with this recommendation and no additional archaeological survey is needed.

A literature review and field survey were conducted as part of the investigations. A total of seven (7) extant architectural resources fifty years of age or older were identified in the Area of Potential Effects (APE). One (1) resource is a National Register-listed historic district (SG100003579). It is Weller's recommendation that none of the other architectural resources are eligible for listing in the NRHP. Our office agrees with Weller's recommendations of eligibility. The historic district will not be directly impacted by the planned work.

Based on the information provided, we agree the project as proposed will have no adverse 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. Our office is

currently experiencing network issues that do not allow consultants to access our IForm software for the completion of cultural resource inventory forms. We ask that when the capabilities are available again, Weller & Associates, Inc. needs to complete OAI forms for 33FR3570-33FR3575 and update OAI#33FR3178. Please notify our office when those forms have been completed. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorricks@ohiohistory.org or Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,



Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1099881

OHIO HISTORY CONNECTION

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

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



October 6, 2022

Project Code: 2022-0082743

Re: AEP Vine Street 138 kV transmission line relocation

Dear Mr./Ms.,

The U.S. Fish and Wildlife Service (Service) 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 effects to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

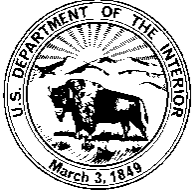
Federally Threatened and Endangered Species: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact us for additional project review.

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

Sincerely,

Patrice Ashfield
Field Office Supervisor

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



February 8, 2023

Re: Breene – Beatty 345kV

Project Code: 2023-0028029

Dear Ms. Speckman:

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: The proposed project is in the vicinity of one or more confirmed records of Indiana bats. Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <https://ecos.fws.gov/ecp/species/9045>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are known or assumed present. Please note that, because Indiana bat presence has already been

confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.

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

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

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

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

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

Sincerely,



Patrice Ashfield
Field Office Supervisor

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



Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

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

October 6, 2022

Aaron Geckle
V3 Companies
312 Walnut Street, Suite 1600
Cincinnati, OH 45202

Re: 22-0910; AEP Vine-City of Columbus West 138 kV Transmission Line Relocation

Project: The proposed project involves relocating approximately 0.3 miles of the existing Vine-City of Columbus 138 kV transmission line from overhead to underground.

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

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

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

Elktoe (*Alasmidonta marginata*), SC
Wavy-rayed Lampmussel (*Lampsilis fasciola*), SC
Round Pigtoe (*Pleurobema sintoxia*), SC
Pondhorn (*Uniomerus tetralasmus*), T

Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened.

The review was performed on the specified project area 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 an area is not a statement that rare species or unique features are absent from that area.

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

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

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

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

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

elephant-ear (<i>Elliptio crassidens crassidens</i>)	pocketbook (<i>Lampsilis ovata</i>)
long solid (<i>Fusconaia maculata maculate</i>)	washboard (<i>Megaloniais nervosa</i>)
Ohio pigtoe (<i>Pleurobema cordatum</i>)	

State Threatened

pondhorn (*Uniomerus tetralasmus*)

Salamander Mussel (*Simpsonaias ambigua*)

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

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

State Endangered

goldeye (*Hiodon alosoides*)

shortnose gar (*Lepisosteus platostomus*)

Iowa darter (*Etheostoma exile*)

spotted darter (*Etheostoma maculatum*)

northern brook lamprey (*Ichthyomyzon fossor*)

tonguetied minnow (*Exoglossum laurae*)

popeye shiner (*Notropis ariommus*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)

paddlefish (*Polyodon spathula*)

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

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

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

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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

Mike Pettegrew
Environmental Services Administrator



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
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February 17, 2023

Olivia Speckman
V3 Companies
619 North Pennsylvania Street
Indianapolis, IN 46204

Re: 23-0083; Greene-Beatty 345 kV Transmission Line Remediation Project

Project: The proposed project involves replacing four structures along the existing transmission line located northeast and southwest of SR 665 and Lambert Road.

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

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

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

Spotted Darter (*Etheostoma maculatum*), E
Tippecanoe Darter (*Etheostoma tippecanoe*), SC
Northern Riffleshell (*Epioblasma rangiana*), E, FE
Snuffbox (*Epioblasma triquetra*), E, FE
Wavy-rayed Lampmussel (*Lampsilis fasciola*), SC
Clubshell (*Pleurobema clava*), E, FE
Kidneyshell (*Ptychobranhus fasciolaris*), SC
Rayed Bean (*Villosa fabalis*), E, FE

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

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

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

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

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

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

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

clubshell (*Pleurobema clava*)

rayed bean (*Villosa fabalis*)

northern riffleshell (*Epioblasma torulosa rangiana*)

snuffbox (*Epioblasma triquetra*)

purple cat's paw (*Epioblasma o. obliquata*)

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

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

State Threatened

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

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

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

State Endangered

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

State Threatened

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

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

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

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

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

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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

Mike Pettegrew
Environmental Services Administrator

Appendix C Ecological Survey



AECOM
525 Vine Street, Suite 1800
Cincinnati, OH 45202
www.aecom.com

To:
Amy Toohey
American Electric Power Ohio Transmission
Company, Inc.
8600 Smiths Mill Road
New Albany, Ohio, 43054

Project name:
Harrison Extension 138 kV Transmission Line
(Structures 25 & 26) Project

Project ref:
60715639

Date:
September 26, 2023

Memo

Subject: Ecological Field Assessment Memo

Introduction

American Electric Power Ohio Transmission Company, Inc. (AEP), is proposing to replace two existing structures (Structures 25 and 26) with a pole-to-pole replacement to increase the height of the transmission line along 0.15-mile section of the Harrison Extension 138 kV Transmission Line (Structures 25 & 26) Project (Project) in Franklin County, Ohio (OH). AECOM Technical Services, Inc. (AECOM) was retained by AEP to complete a wetland delineation and stream assessment for the Project area located within Lockbourne, OH United States Geological Survey (USGS) 7.5-minute topographic quadrangle. The coordinates for Structure 25 are 39.841251, -82.946600, and the coordinates for Structure 26 are 39.843306, -82.946442 (**Figure 1**).

Methods

Prior to conducting field surveys, digital and published county United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil surveys (USDA NRCS, 2019, 2021, and 2023), United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) maps, and USGS 7.5-minute topographic maps were reviewed as an exercise to identify the occurrence and location of wetlands and/or streams (**Figure 1**). The purpose of the field survey was to determine whether wetlands and other “waters of the United States” are present within the Project survey area, which consisted of an 0.24-acre area as displayed on **Figure 2** and **Figure 3**.

AECOM completed the wetland delineation in accordance with the United States Army Corps of Engineers (USACE) 1987 Wetland Delineation Manual (1987 Manual) (Environmental Laboratory, 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) (Regional Supplement) (USACE, 2010). The classification of wetland habitats as palustrine emergent (PEM), palustrine forest (PFO), palustrine unconsolidated bottom (PUB), and palustrine scrub-shrub (PSS) were accomplished by adhering to the methodology within Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al., 1979) and vegetation was assigned an indicator status based on 2018 National Wetland Plant List (USACE, 2020). Wetland areas were further assessed utilizing Ohio Environmental Protection Agency (OEPA) Ohio Rapid Assessment Method for Wetlands v. 5.0 (Mack, 2001) to determine the relative ecological quality and level of disturbance of a particular wetland.

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 (QHEI) (Rankin, 2006) and/or Field Evaluation Manual for Ohio's Primary Headwater Habitat Streams, Version 3 (OEPA, 2020).

Initial coordination letters to the United States Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) were sent on September 12, 2023, and both USFWS and ODNR responses have not yet been received. Due to the emergency nature of this Project, USFWS and ODNR agency coordination from two other adjacent projects responses from within Franklin County (23-0083, Greene-Beatty 345 kV Transmission Line Remediation Project [ODNR] and Project Code: 2023-0028029 [USFWS] ; 22-0910, AEP Vine-City of Columbus West 138 kV Transmission Line Relocation [ODNR] and Project Code: 2022-0082743 [USFWS]) were utilized to complete a preliminary assessment of potential listed state species and their critical habitat within range of the Project. Copies of the previously received USFWS and ODNR agency correspondence has been provided in

Appendix A. Upon receipt of the official responses from USFWS and ODNR, an Addendum Memo will be provided to document any changes for potential state listed species within the Project area.

Results

Desktop Review and Existing Site Conditions

Prior to field investigations, AECOM reviewed existing online resources to identify the potential of wetlands and streams to occur within the Project survey area. According to the USDA/NRCS Web Soil Survey for Franklin County and NRCS Hydric Soils List of Ohio, a total of three soil map units were identified within the Project survey area and none of the soils map units were identified as hydric. A list of soils and hydric indicators are:

- Celina silt loam, 0 to 2 percent slopes (CeB) - Not Hydric but does have hydric inclusions (Brookston – 5%, Kokomo – 5%)
- Crosby silt loam, Southern Ohio Till Plain, 0 to 2 percent slopes (CrA) - Not Hydric but does have one hydric inclusion (Kokomo, drained – 5%)
- Miamian silty clay loam, 2 to 6 percent slopes, eroded (MIB2) - Not Hydric but does have one hydric inclusion (Kokomo – 8%)

Following review of hydric soils, NWI mapped wetlands were reviewed within the Project survey area identified and reviewed during the field investigations. No NWI mapped wetlands were identified within the Project survey area as displayed on **Figure 2**.

Based on topographic maps, the Project area drains into Big Walnut Creek, which flows into the Scioto River and eventually into the Ohio River. Big Walnut Creek and its unnamed tributaries are located within the Scioto River Basin, which contains the Town of Lockbourne-Big Walnut Creek [Hydrologic Unit Code (HUC)-12: 050600011603] as shown on **Figure 4**. As per the Section 401 Water Quality Certification (WQC) for Nationwide Permit and Stream Eligibility Web Map (OEPA 2017), the Project survey area is located within a designated Ineligible Area and if impacts to streams are required, the disturbance cannot be authorized by the USACE under the Nationwide Permit Conditions. Big Walnut Creek has an existing OAC Chapter 3745-1 aquatic life habitat use designation of Exceptional Warmwater Habitat (WWH).

The land use of the Project area was assigned general classification based upon the principal land characteristics observed through aerial photography as well as onsite investigations during the field surveys. The general land use types in the Project survey area includes Old Field and Urban as displayed on **Figure 5** and representative habitat photographs provided as **Appendix B**. The majority of the land use within the Project survey area was identified as old field habitat situated within an existing transmission line right-of-way, which limits the opportunity for sensitive species or their critical habitat to be present within the Project area.

The desktop review for potential hibernaculum in accordance with the 2023 Ohio ODNR DOW and USFWS Joint Guidance for Bat Surveys and Tree Clearing (2023 Joint Guidance; **Appendix C**) was completed within 0.25-miles of the Project and no caves, mines and/or karst features were identified. As per ODNR/USFWS guidance, further coordination regarding potential hibernaculum is only necessary if the habitat assessment finds potential habitat within 0.25 miles of the Project area. Therefore, no further coordination was necessary with either the ODNR and/or USFWS regarding the listed bat species. Results of the desktop habitat assessment have been included within **Appendix D**.

According to the Federal Emergency Management Agency (FEMA), no 100-year floodplains or regulated FEMA floodways were identified at Structures 25 & 26 (**Figure 2**). Therefore, no further coordination regarding floodplain activities is warranted for the Project (FEMA, 2008).

Field Results

An ecological field investigation was completed within the Project survey area on September 5, 2023, and no streams, ponds, upland drainage features, or wetlands were identified. One upland data point and USACE data form was completed to characterize the site, as shown on **Figure 3**. Photographs and the data form associated with the upland data point are provided as **Appendix E**.

Regarding state and federal listed threatened and endangered species that may occur within the Project vicinity, a total of two species were identified by the USFWS and twenty-six identified by the ODNR, based on correspondence received from other activities within range of this Project. According to the ODNR, there is a

known presence of the Indiana bat, northern long-eared bat, and the little brown bat in the vicinity of the Project area. The tricolored bat is not known to be present in the vicinity of the Project area. Based on general observations during the ecological field investigation, no tree clearing is anticipated to be required as part of the Project as forested habitat does not exist. If tree clearing were to become part of the Project scope of work, the ODNR recommends seasonal tree clearing to occur between October 1 and March 31 to avoid adverse effects to the Indiana bat, Northern long-eared bat, tricolored bat, and the little brown bat. Additional summer tree surveys for the Indiana bat and the little brown bat would not constitute a presence or absence of the species within the Project area. If summer tree clearing is required, additional coordination would be completed with the ODNR/USFWS.

No impacts are anticipated for any of the aquatic listed species as no habitat is present and no in-water work is proposed as part of the Project. Additionally, the potential for nesting habitat for the Northern Harrier was absent based on field/desktop review of the Project survey area. The fragmented habitat was from highly developed, commercial property dominated by urban land that includes maintained lawn, parking lot and the existing transmission line right-of-way. Therefore, no further coordination regarding the aquatic listed species or the Northern Harrier is necessary for this Project. Based on the review of these species and the habitat identified within the Project area, it is not anticipated that the Project would adversely affect any of the species or their habitats identified within **Table 1**.

**TABLE 1
ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT SURVEY AREA**

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Mammals							
Indiana Bat (<i>Myotis sodalis</i>)	Endangered	Endangered	<p><u>Summer habitat</u> During spring/summer, this bat species roosts in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves.</p> <p><u>Hibernaculum(a)</u> During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.</p>	<p><u>Summer habitat</u> Within the Project survey area, the existing land use is composed of open maintained lawn or urban areas that lack the presence of forested or suitable bat roosting trees.</p> <p><u>Hibernaculum(a)</u> No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5-miles of the Project. Furthermore, field evaluations did not identify any potential hibernaculum(a) within the Project area (2023 Joint Guidance).</p>	April 1 – September 30	<p><u>Summer habitat</u> ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30).</p> <p>Additionally, the ODNR indicated that there is a known presence of this species within the Project area and summer surveys would not constitute a presence or absence of this species.</p> <p><u>Hibernaculum(a)</u> The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2023 Joint Guidance). If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.</p>	<p><u>Summer habitat</u> No impact to listed bat species or their habitat is anticipated due to absence of tree clearing activities. If tree clearing is required, it should be completed between October 1 and March 31.</p> <p><u>Hibernaculum(a)</u> No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25-miles of the Project.</p>
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	Endangered	Endangered	<p><u>Summer habitat</u> During spring/summer, this bat species roosts in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves.</p> <p><u>Hibernaculum(a)</u> During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.</p>	<p><u>Summer habitat</u> Within the Project survey area, the existing land use is composed of open maintained lawn or urban areas that lack the presence of forested or suitable bat roosting trees.</p> <p><u>Hibernaculum(a)</u> No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5-miles of the Project. Furthermore, field evaluations did not identify any potential hibernaculum(a) within the Project area (2023 Joint Guidance).</p>	April 1 – September 30	<p><u>Summer habitat</u> ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30).</p> <p>Additionally, the ODNR indicated that there is a known presence of this species within the Project area and summer surveys would not constitute a presence or absence of this species.</p> <p><u>Hibernaculum(a)</u> The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2023 Joint Guidance). If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.</p>	<p><u>Summer habitat</u> No impact to listed bat species or their habitat is anticipated due to absence of tree clearing activities. If tree clearing is required, it should be completed between October 1 and March 31.</p> <p><u>Hibernaculum(a)</u> No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25-miles of the Project.</p>
Little brown bat (<i>Myotis lucifugus</i>)	Endangered	NA	<p><u>Summer habitat</u> During spring/summer, this bat species roosts in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves.</p> <p><u>Hibernaculum(a)</u> During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.</p>	<p><u>Summer habitat</u> Within the Project survey area, the existing land use is composed of open maintained lawn or urban areas that lack the presence of forested or suitable bat roosting trees.</p> <p><u>Hibernaculum(a)</u> No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5-miles of the Project. Furthermore, field evaluations did not identify any potential hibernaculum(a) within the Project area (2023 Joint Guidance).</p>	April 1 – September 30	<p><u>Summer habitat</u> ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30).</p> <p>Additionally, the ODNR indicated that there is a known presence of this species within the Project area and summer surveys would not constitute a presence or absence of this species.</p> <p><u>Hibernaculum(a)</u> The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2023 Joint Guidance). If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.</p>	<p><u>Summer habitat</u> No impact to listed bat species or their habitat is anticipated due to absence of tree clearing activities. If tree clearing is required, it should be completed between October 1 and March 31.</p> <p><u>Hibernaculum(a)</u> No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25-miles of the Project.</p>

**TABLE 1
ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT SURVEY AREA**

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Tricolored bat (<i>Perimyotis subflavus</i>)	Endangered	Proposed	<p><u>Summer habitat</u> During spring/summer, this bat species roosts in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves.</p> <p><u>Hibernaculum(a)</u> During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.</p>	<p><u>Summer habitat</u> Within the Project survey area, the existing land use is composed of open maintained lawn or urban areas that lack the presence of forested or suitable bat roosting trees.</p> <p><u>Hibernaculum(a)</u> No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5-miles of the Project. Furthermore, field evaluations did not identify any potential hibernaculum(a) within the Project area (2023 Joint Guidance).</p>	April 1 – September 30	<p><u>Summer habitat</u> ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30).</p> <p><u>Hibernaculum(a)</u> The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2023 Joint Guidance). If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.</p>	<p><u>Summer habitat</u> No impact to listed bat species or their habitat is anticipated due to absence of tree clearing activities. If tree clearing is required, it should be completed between October 1 and March 31.</p> <p><u>Hibernaculum(a)</u> No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25-miles of the Project.</p>
Fish							
Goldeye (<i>Hiodon alosoides</i>)	Endangered	None	Perennial Streams	No - no rivers present.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Iowa darter (<i>Etheostoma exile</i>)	Endangered	None	Perennial Streams	No – no natural lakes present.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Lake chubsucker (<i>Erimyzon sucetta</i>)	Threatened	None	Perennial Streams	No – no lakes, ponds, swamps or streams were identified in the Project survey area.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Northern brook lamprey (<i>Ichthyomyzon fossor</i>)	Endangered	None	Perennial Streams	No - no streams identified within the Project survey area.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Paddlefish (<i>Polyodon spathula</i>)	Threatened	None	Perennial Streams	No – no rivers present.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Popeye shiner (<i>Notropis ariommus</i>)	Endangered	None	Perennial Streams	No – no streams identified within the Project survey area.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Shortnose gar (<i>Lepisosteus platostomus</i>)	Endangered	None	Perennial Streams	No - no rivers present.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Spotted darter (<i>Etheostoma maculatum</i>)	Endangered	None	Perennial Streams	No - no streams identified within the Project survey area.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Tonguetied minnow (<i>Exoglossum laurae</i>)	Endangered	None	Perennial Streams	No – Project is outside the Great Miami and Little Miami River system.	<u>In-Water Work</u> March 15 – June 30	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 this or other aquatic species.	No
Mussels							
Clubshell (<i>Pleurobema clava</i>)	Endangered	Endangered	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No

**TABLE 1
ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT SURVEY AREA**

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Elephant-ear (<i>Elliptio crassidens crassidens</i>)	Endangered	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Long solid (<i>Fusconaia maculata maculate</i>)	Endangered	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Northern riffleshell (<i>Epioblasma torulosa rangiana</i>)	Endangered	Endangered	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Ohio pigtoe (<i>Pleurobema cordatum</i>)	Endangered	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Pocketbook (<i>Lampsilis ovata</i>)	Endangered	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Pondhorn (<i>Unio merus tetralasmus</i>)	Threatened	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Purple cat's paw (<i>Epioblasma o. obliquata</i>)	Endangered	Endangered	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Rabbitsfoot (<i>Quadrula cylindrica cylindrica</i>)	Threatened	Threatened	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Rayed bean (<i>Villosa fabalis</i>)	Endangered	Endangered	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Salamander mussel (<i>Simpsonaias ambigua</i>)	Threatened	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Snuffbox (<i>Epioblasma triquetra</i>)	Endangered	Endangered	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Washboard (<i>Megaloniais nervosa</i>)	Endangered	None	Perennial Streams	No – no streams identified within the Project survey area.	N/A	Due to the location, and there is no in-water work proposed in a perennial stream of sufficient size, this Project is not likely to impact this species.	No
Birds							
Northern harrier (<i>Circus hudsonius</i>)	Endangered	None	This species hunts over grasslands and nests can be found in large marshes and grasslands of 2-acres or greater in size.	No - Based on field reviews, the Project area contains habitat that is fragmented and within close proximity to industrial development, thus subjected to "edge effect" and increased predation; surrounding area is urbanized/industrial with a high density of surrounding agricultural land	April 15 to July 31	Habitat should be avoided during the bird's nesting period between April 15 through July 31. If habitat will not be impacted, this Project will not likely impact species.	No

*2023 Joint Guidance – Refers to the 2023 ODNR DOW and USFWS Joint Guidance for Bat Surveys and Tree Clearing, a copy of the guidance is provided within **Appendix C** of this memo.

Conclusion

An ecological field assessment was completed on September 5, 2023, as part of the Harrison Extension 138 kV Transmission Line (Structures 25 & 26) Project and no streams, ponds, upland drainage features or wetlands were identified within the Project survey area.

Of the twenty-six state and/or federally listed species or their habitat within range of the Project survey area, four bat species are known to be within range of the Project. Based on field and desktop evaluations, no suitable summer roosting habitat was identified, and no winter habitat hibernaculum was identified within 0.25 miles of the Project area. Based on the site assessment, tree clearing is not anticipated to be required for this Project. If tree clearing is required, the ODNR/USFWS recommend clearing to occur between October 1 and March 31 (**Appendix C**). The ODNR also indicated a known presence of the Indiana bat, northern long-eared bat, and the little brown bat; therefore, summer surveys will not confirm presence/absence for these species. If summer clearing is required, further coordination with the ODNR and USFWS will be warranted.

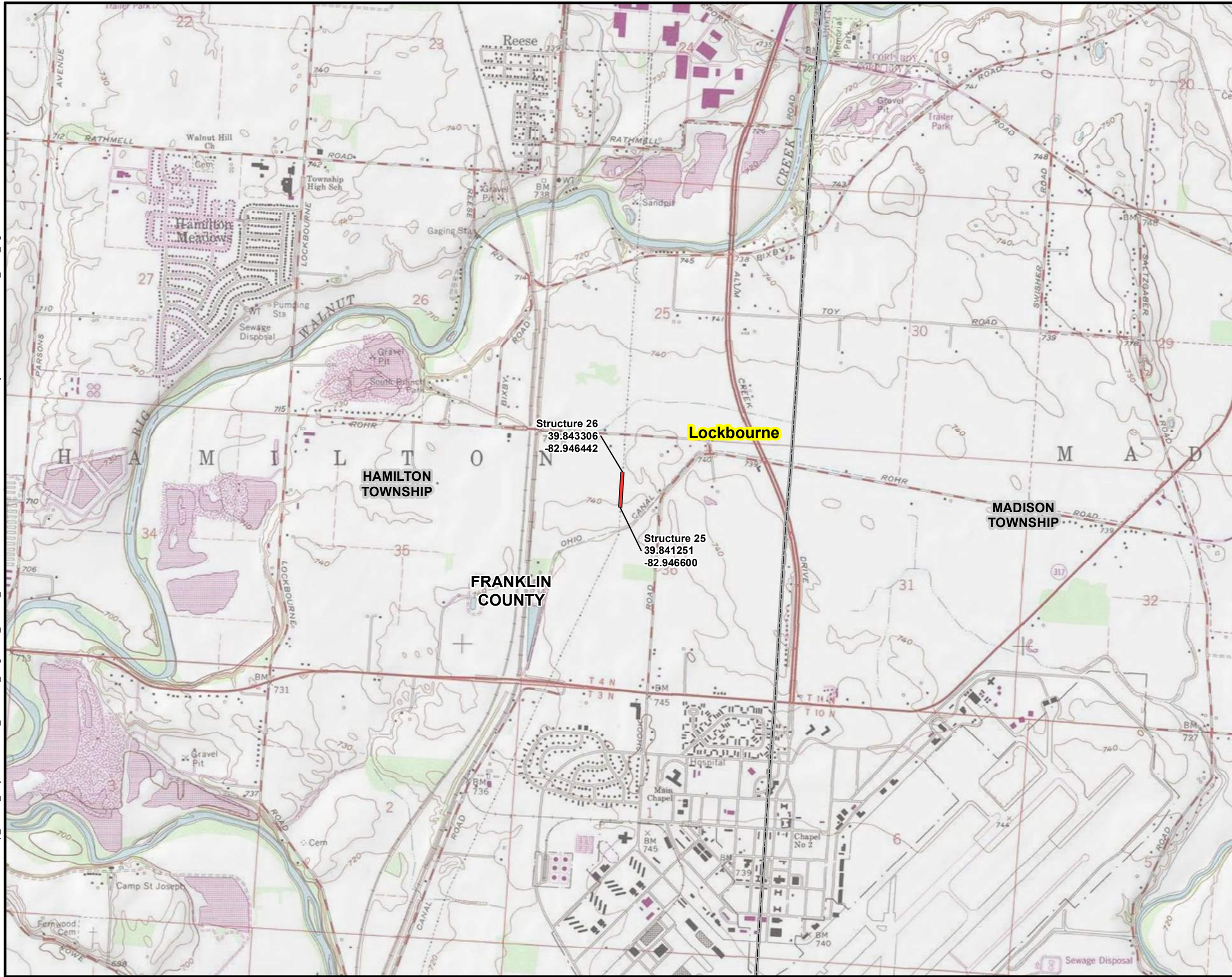
As the state and federal listed species have not been provided from the ODNR and USFWS for this Project, this assessment is based off the combination of two other previously provided responses from the ODNR in Franklin County, Ohio. Upon receipt of the official response for this Project, an addendum report will be provided to document any additional species identified by the ODNR and USFWS.

The field survey results presented herein apply to the existing and reasonably foreseeable site conditions at the time of our assessment. They cannot apply to site changes of which AECOM is unaware and has not had the opportunity to review. Changes in the condition of a property may occur with time due to natural processes or human impacts at the Project site or on adjacent properties. Changes in applicable standards may also occur as a result of legislation or the expansion of knowledge over time. Accordingly, the findings of this report may be invalidated, wholly or in part, by changes beyond the control of AECOM.





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Figures



Legend

-  Harrison Extension 138kV Transmission Line
-  Ohio USGS 7.5' Topographic Quadrangle
-  Township Boundary
-  County Boundary

Structure 26
 39.843306
 -82.946442

Lockbourne

Structure 25
 39.841251
 -82.946600

HAMILTON TOWNSHIP

MADISON TOWNSHIP

FRANKLIN COUNTY

0 1,000 2,000 4,000
 Feet

N


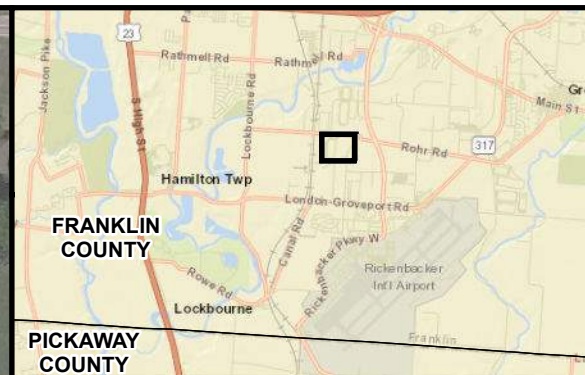
 Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement Project

FIGURE 1 PROJECT OVERVIEW	
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JOB NO.: 60715639	AECOM

Date Saved: 9/15/2023
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Legend

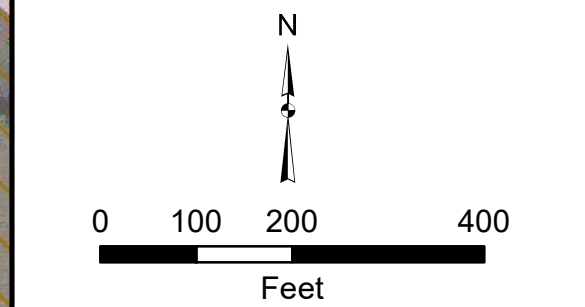
- Structure
- ▲ Upland Data Point
- Culvert
- Harrison Extension 138 kV Transmission Line
- NHD Stream (USGS)
- ▭ Project survey area
- ▨ NWI Wetlands (USFWS)
- ▭ HUC 12 (USGS)
- ▭ Township Boundary
- ▭ County Boundary
- ▭ SSURGO Soil Map Unit (NRCS)
- ▭ Hydric SSURGO Soil Map Unit (NRCS)

Soil Map Unit Description

CeB: Celina silt loam, 0 to 2 percent slopes

CrA: Crosby silt loam, Southern Ohio Till Plain, 0 to 2 percent slopes

MIB2: Miamian silty clay loam, 2 to 6 percent slopes, eroded

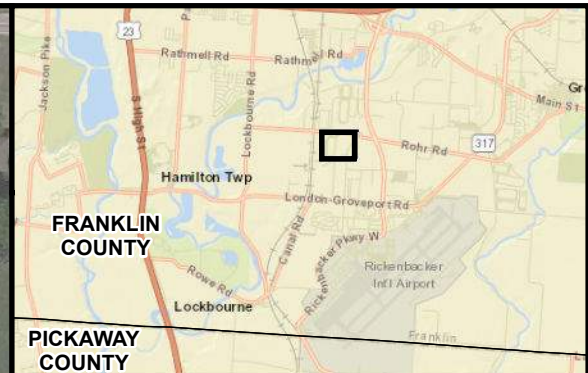


AMERICAN ELECTRIC POWER Harrison Extension 138 kV Transmission Line Structures 25 & 26 Replacement Project

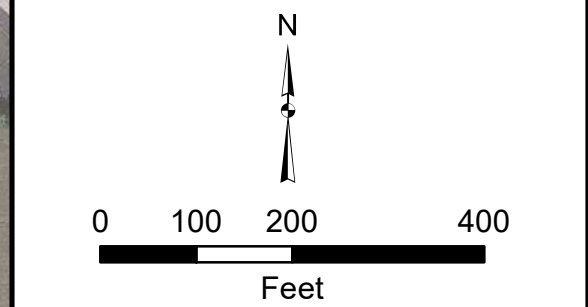
FIGURE 2
 SHEET 1 OF 1
 SOIL MAP AND
 NATIONAL WETLANDS INVENTORY MAP

DATE: 9/15/2023	1 INCH = 200 FEET
CREATED BY: CJT	CHECKED BY: JH
JOB NO.: 60715639	AECOM

Date Saved: 9/15/2023
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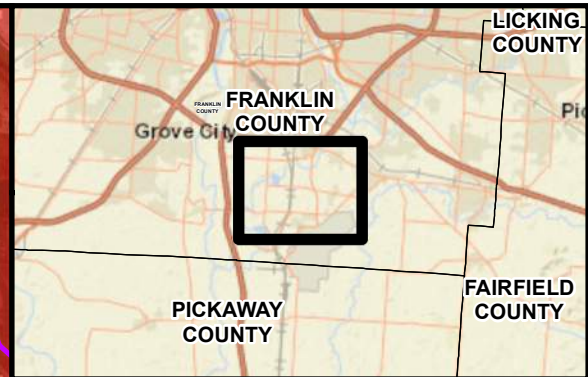
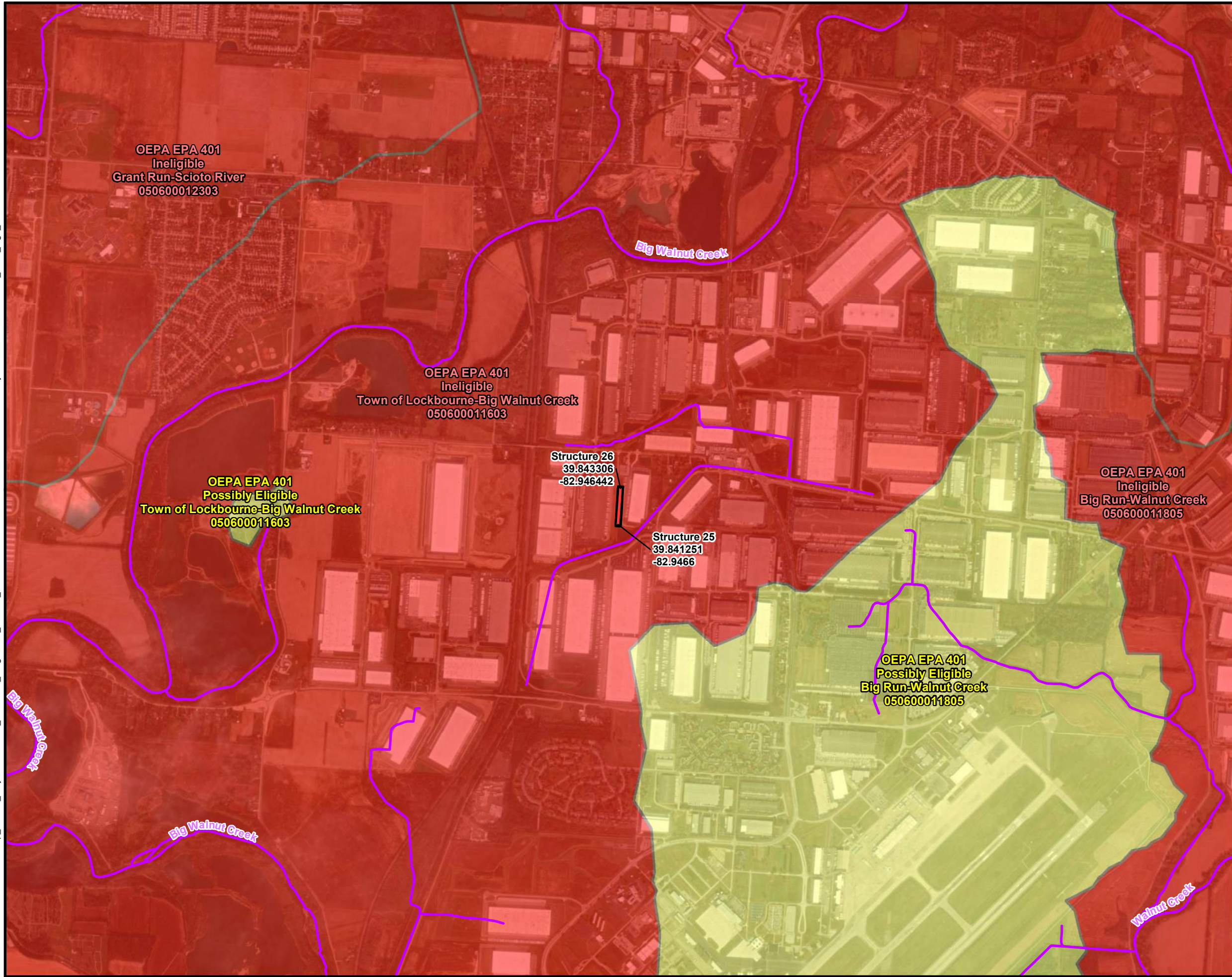
- Legend**
- Structure
 - ▲ Upland Data Point
 - Culvert
 - Harrison Extension 138 kV Transmission Line
 - NHD Stream (USGS)
 - Contours (2ft)
 - ▭ Project survey area
 - ▭ Township Boundary
 - ▭ County Boundary



AMERICAN ELECTRIC POWER Harrison Extension 138 kV Transmission Line Structures 25 & 26 Replacement Project

FIGURE 3
 SHEET 1 OF 1
 WETLAND DELINEATION AND
 STREAM ASSESSMENT MAP

DATE: 9/15/2023	1 INCH = 200 FEET
CREATED BY: CJT	CHECKED BY: JH
JOB NO.: 60715639	AECOM



Legend

- Harrison Extension 138kV Transmission Line
- NHD Stream (USGS)
- Project survey area

OEPA Eligibility:

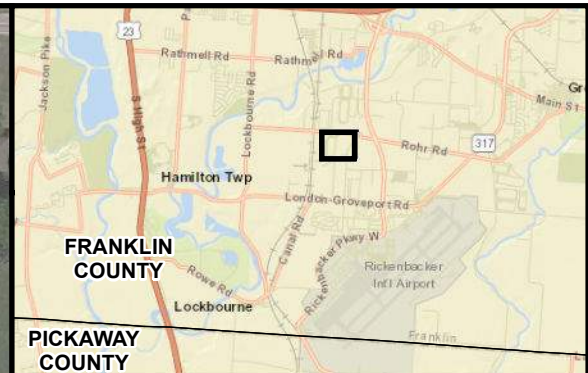
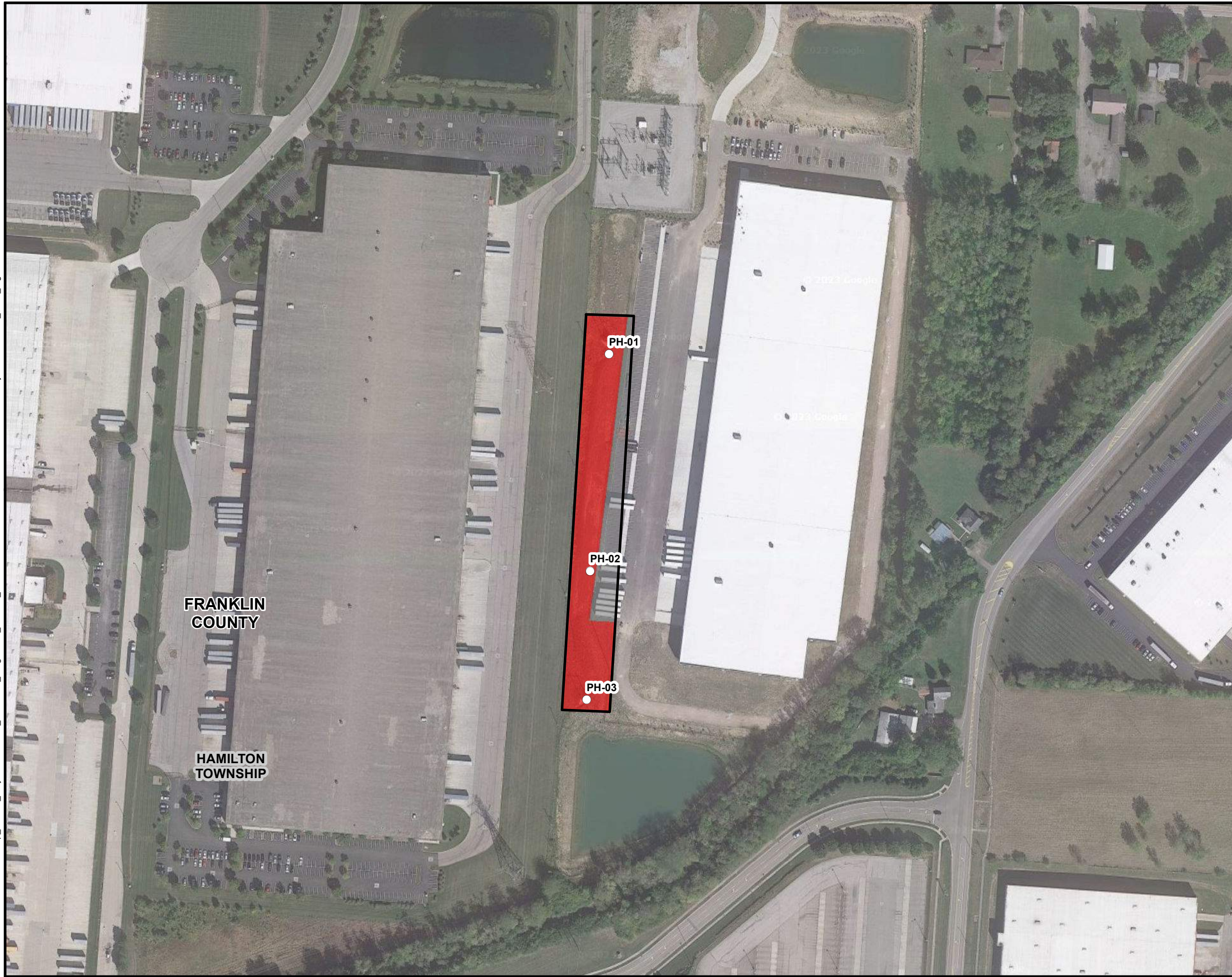
- Ineligible
- Possibly Eligible

N

0 1,000 2,000 4,000
Feet

Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement Project

FIGURE 4 STREAM ELIGIBILITY MAP	
DATE: 9/14/2023	1 INCH = 2,000 FEET
CREATED BY: AH	CHECKED BY: JH
JOB NO.: 60715639	AECOM

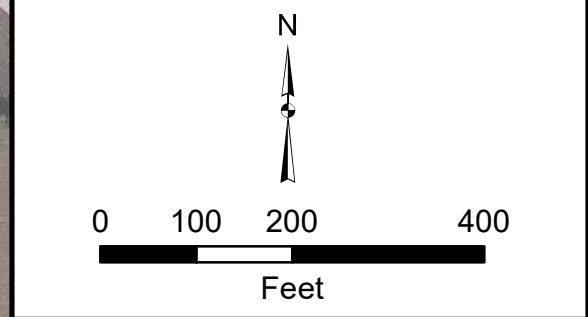


Legend

- Photograph Location
- ▭ Project survey area
- ▭ Township Boundary
- ▭ County Boundary

Vegetative Community Type

- Old Field
- Urban



AMERICAN ELECTRIC POWER Harrison Extension 138 kV Transmission Line Structures 25 & 26 Replacement Project

FIGURE 5
 SHEET 1 OF 1
 VEGETATIVE COMMUNITIES
 ASSESSMENT MAP

DATE: 9/15/2023	1 INCH = 200 FEET
CREATED BY: CJT	CHECKED BY: JH
JOB NO.: 60715639	AECOM

APPENDIX A: USFWS/ODNR RESPONSE LETTERS



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

October 6, 2022

Aaron Geckle
V3 Companies
312 Walnut Street, Suite 1600
Cincinnati, OH 45202

Re: 22-0910; AEP Vine-City of Columbus West 138 kV Transmission Line Relocation

Project: The proposed project involves relocating approximately 0.3 miles of the existing Vine-City of Columbus 138 kV transmission line from overhead to underground.

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

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

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

Elktoe (*Alasmidonta marginata*), SC
Wavy-rayed Lampmussel (*Lampsilis fasciola*), SC
Round Pigtoe (*Pleurobema sintoxia*), SC
Pondhorn (*Uniomerus tetralasmus*), T

Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened.

The review was performed on the specified project area 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 an area is not a statement that rare species or unique features are absent from that area.

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

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

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

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

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

elephant-ear (<i>Elliptio crassidens crassidens</i>)	pocketbook (<i>Lampsilis ovata</i>)
long solid (<i>Fusconaia maculata maculate</i>)	washboard (<i>Megaloniais nervosa</i>)
Ohio pigtoe (<i>Pleurobema cordatum</i>)	

State Threatened

pondhorn (*Uniomerus tetralasmus*)

Salamander Mussel (*Simpsonaias ambigua*)

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

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

State Endangered

goldeye (*Hiodon alosoides*)

shortnose gar (*Lepisosteus platostomus*)

Iowa darter (*Etheostoma exile*)

spotted darter (*Etheostoma maculatum*)

northern brook lamprey (*Ichthyomyzon fossor*)

tonguetied minnow (*Exoglossum laurae*)

popeye shiner (*Notropis ariommus*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)

paddlefish (*Polyodon spathula*)

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

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

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

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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

Mike Pettegrew
Environmental Services Administrator

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



October 6, 2022

Project Code: 2022-0082743

Re: AEP Vine Street 138 kV transmission line relocation

Dear Mr./Ms.,

The U.S. Fish and Wildlife Service (Service) 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 effects 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: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact us for additional project review.

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

Sincerely,

Patrice Ashfield
Field Office Supervisor



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

February 17, 2023

Olivia Speckman
V3 Companies
619 North Pennsylvania Street
Indianapolis, IN 46204

Re: 23-0083; Greene-Beatty 345 kV Transmission Line Remediation Project

Project: The proposed project involves replacing four structures along the existing transmission line located northeast and southwest of SR 665 and Lambert Road.

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

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

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

Spotted Darter (*Etheostoma maculatum*), E
Tippecanoe Darter (*Etheostoma tippecanoe*), SC
Northern Riffleshell (*Epioblasma rangiana*), E, FE
Snuffbox (*Epioblasma triquetra*), E, FE
Wavy-rayed Lampmussel (*Lampsilis fasciola*), SC
Clubshell (*Pleurobema clava*), E, FE
Kidneyshell (*Ptychobranhus fasciolaris*), SC
Rayed Bean (*Villosa fabalis*), E, FE

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

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

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

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

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

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

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

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

State Threatened

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

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

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

State Endangered

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

State Threatened

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

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

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

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

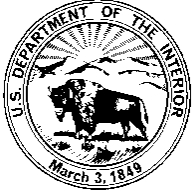
Water Resources: The Division of Water Resources has the following comment.

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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

Mike Pettegrew
Environmental Services Administrator

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



February 8, 2023

Re: Breene – Beatty 345kV

Project Code: 2023-0028029

Dear Ms. Speckman:

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: The proposed project is in the vicinity of one or more confirmed records of Indiana bats. Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <https://ecos.fws.gov/ecp/species/9045>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are known or assumed present. Please note that, because Indiana bat presence has already been

confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.

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

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

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

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

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

Sincerely,





Patrice Ashfield
Field Office Supervisor

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

APPENDIX B: HABITAT PHOTOGRAPHS

Client Name: AEP	Site Location: Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement	Project No. 60715639
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PH-01	
Date: September 5, 2023	
Description: Old Field Facing South	

PH-02	
Date: September 5, 2023	
Description: Old Field and Urban Facing West	

Client Name: AEP	Site Location: Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement	Project No. 60715639
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PH-03	
Date: September 5, 2023	
Description: Old Field Facing North	

APPENDIX C: 2023 JOINT GUIDANCE



OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE (OH-FIELD OFFICE) JOINT GUIDANCE FOR BAT SURVEYS AND TREE CLEARING MAY 2023

This document has been updated with new state guidance for the 2023 field season.

This guidance applies to state recommendations only. Contact the USFWS to determine if federal consultation is also necessary to comply with federal law.

Agency Contacts:

ODNR-DOW Permit Coordinator: Wildlife.Permits@dnr.ohio.gov, (614) 265-6315

ODNR-DOW Bat Survey Coordinator: Eileen Wyza, Eileen.Wyza@dnr.ohio.gov, (614) 265-6764

USFWS OHFO Endangered Species: Angela Boyer, angela_boyer@fws.gov, (614) 416-8993, ext.122

Covid-19 Guidance:

Surveyors should follow all covid protocols put in place by their agency. All surveyors should wear masks when handling bats and anyone exhibiting symptoms of covid-19 should not participate in bat surveys.

Ohio Mist-net Surveys:

This document serves as guidance for bat mist netting activities in Ohio and does not supersede any requirements listed on your permits or facility certificate. All permit conditions must be strictly adhered to for permits to be valid and for renewal of permits beyond the existing year.

Due to the presence of White-nose Syndrome (WNS), mist-netting in Ohio must be conducted between June 1 and August 15 unless stated otherwise in your state permit. The ODNR Division of Wildlife (ODNR-DOW) and U.S. Fish and Wildlife Service (USFWS) Ohio Field Office (OHFO) have determined that delaying netting activities until June 1 will provide additional recovery time for bats affected by WNS. For presence/probable absence surveys, netting will not be accepted outside of the June 1 - August 15 timeframe.

To assess project areas for presence or probable absence of the state and federally listed Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) during summer residency, the USFWS developed the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (March 2023). This protocol, **with minor modifications referenced below**, can also be used in Ohio for the 2023 field season and includes surveying for the state-listed little brown bat (*Myotis lucifugus*) and tricolored bat (*Perimyotis subflavus*).

According to the updated federal range-wide guidelines, presence/probable absence net surveys for northern long-eared bats shall incorporate either 10 net nights per square 0.5 kilometer (123 acres) of project area, or four net nights per kilometer for linear projects. Presence/probable absence net surveys for Indiana bats shall incorporate six net nights per square 0.5 kilometer (123 acres) of project area, or two net nights per kilometer for linear

projects. If a project area is eligible for a presence/probable absence survey for both Indiana bats and northern long-eared bats, following the northern long-eared bat level of effort will qualify as a presence/ probable absence survey for both species. However, if a project area is eligible for a presence/absence survey for both species, following the Indiana bat level of effort will not qualify the survey for a northern long-eared bat presence/ probable absence survey. Please note that the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (March 2023) requires that a minimum of two (2) biologists (e.g., one permitted and one technician) must be on-site for every four (4) net-sets being operated. Exceptions to on-site minimum staffing levels may be allowed under extenuating circumstances, provided written justification is included in the proposed survey study plan and subsequently approved by the OHFO and ODOW.

Due to the reclassification of the northern long-eared bat on March 31, 2023, the previous northern long-eared bat 4(d) rule has been nullified. There is a new online tool in the USFWS's Information for Planning and Consultation (IPaC) website that allows project proponents to utilize a determination key (Dkey) for the northern long-eared bat. **The Dkey cannot be used to replace consultation with ODNR-DOW.** Project proponents should coordinate directly with the ODNR-DOW and the OHFO for project technical assistance for all federally listed species, including the Indiana bat and northern long-eared bat.

The tricolored bat is listed as endangered by ODNR-DOW. Additionally, the USFWS published a proposed rule to list the tri-colored bat as endangered on September 14, 2022. The USFWS is scheduled to publish a final rule on the tricolored bat's status by the end of September 2023 which could affect future project development. Therefore, in anticipation of this listing we recommend that project proponents coordinate with the OHFO in addition to ODNR-DOW to determine if the project could benefit from formal coordination with USFWS for tricolored bat. The USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (March 2023) allows presence/absence surveys for the tricolored bat that use the northern long-eared bat level of effort.

Exception for Ohio mist-net surveys: All presence/absence surveys conducted for state listed bat species (Indiana, northern long-eared, little brown, tricolored) should follow the maximum net nights set forth in the federal guidance to be considered valid by ODNR-DOW. Any modifications to this position will be communicated at the time of the site authorization approval.

Ohio Acoustic Surveys:

Acoustic bat surveys for presence/absence will be accepted by ODNR-DOW for the 2023 season. Surveys should follow guidelines laid out in the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (March 2023) with the following exceptions:

- Ohio survey dates are June 1 – August 15, 2022
- After conducting automated analyses using one or more of the currently available 'approved' acoustic bat ID programs¹, qualitative analysis (i.e., manual vetting) of any calls recorded from state-endangered species (*M. sodalis*, *M. septentrionalis*², *M. lucifugus*², and *P. subflavus*²) must be completed.
- **All presence/absence acoustic surveys conducted for state listed bat species (Indiana, northern long-eared, little brown, tricolored) should follow the maximum acoustic nights set forth in the federal guidance to be considered valid by ODNR-DOW. Any modifications to this position will be communicated at the time of the site authorization approval.**

At a minimum, for each detector site/night a program considered presence of state-listed bats likely, review all files (including no IDs) from that site/night. If more than one acoustic bat ID program is used, qualitative analysis must also include a comparison of the results of each program by site and night.

¹ <https://www.fws.gov/media/indiana-bat-summer-survey-guidance>

² State listing as endangered effective July 1, 2020

Combined Mist-netting and Acoustic Surveys:

ODNR-DOW will accept the USFWS pilot survey option of combining mist-netting and acoustic surveys for traditional survey sites (e.g., 123-acre area) detailed in Appendix I of the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (2023). All presence/absence combined mist-net and acoustic surveys conducted for state listed bat species should follow the maximum level of effort set forth by the federal guidance to be considered valid by ODNR-DOW. Any modifications to this position will be communicated at the time of the site authorization approval.

Before Field Season:

- Anyone surveying bats using mist-nets in the state of Ohio must obtain a federal permit as well as a state scientific collection permit. The federal permit should include both the Indiana bat and the northern long-eared bat.
- Your ODNR-DOW permit consists of two documents: a Scientific Collector (Wild Animal) Permit and an endangered species letter signed by the Chief of the Division of Wildlife (in addition to your federal permit). Both ODNR-DOW documents must be obtained prior to field work and kept with you and any sub-permittees during field work.

During Field Season:

- Prior to initiation of field work (a minimum of two weeks in advance), permittees must provide proposed mist netting plans to USFWS and ODNR-DOW in the form of an e-mail letter to the USFWS OHFO and copy to the ODNR-DOW Bat Survey Coordinator. Plans must be reviewed and approved by USFWS OHFO and ODNR-DOW before ANY surveys take place. Study plans must specify objectives, location details, dates of proposed work, and all other relevant details. **Study plans must also include a USFWS Project Code. Project Codes can only be obtained by requesting an official species list through the USFWS's Information for Planning and Consultation (IPaC) website (<https://ipac.ecosphere.fws.gov/>).** When handling bats, you must strictly adhere to the current WNS Decontamination Protocol (current version can be found at <https://www.whitenosesyndrome.org/topics/decontamination>). Clothing, boots, gear, and equipment should all be thoroughly decontaminated between nights, as well as between netting sites.
- Request bat bands at least two weeks in advance of needing them. Bat bands can be obtained by e-mailing the ODNR-DOW Bat Survey Coordinator with how many bands are needed, current permit number, sizes, and a mailing address. Bands will not be issued until your permits are valid. We have two sizes of bands—2.4 mm and 4.2 mm. The 2.4 mm split metal bat ring made of aluminum alloy is suitable for banding small bats. This band must be placed on all captured Indiana, northern long-eared, little brown, and tricolored bats. The larger 4.2 mm band is suitable for silver-haired (*Lasiurus noctivagans*), big brown (*Eptesicus fuscus*), and hoary (*Lasiurus cinereus*) bats. You must band all Indiana, northern long-eared, little brown, and tricolored bats with ODNR-DOW bands; therefore, you should not be in the field without the 2.4 mm sized band.
- Only individuals who are named on the ODNR-DOW endangered species letter portion of the permit and on the corresponding federal bat permit may conduct and oversee mist-net surveys. Trained assistants may work on permitted bat activities under the direct and on-site supervision of a named permittee. All bat IDs must be verified by a named permittee. If an Indiana bat and/or northern long-eared bat is captured, the permittee shall notify the USFWS and the ODNR-DOW Bat Survey Coordinator referenced above within 48 hours via email. If a little brown bat or tricolored bat is captured, notify the ODNR-DOW Bat Survey Coordinator only within 48 hours via email. Reports of listed bat captures should include specific information such as spatial location of capture, band information, radio-transmitter frequency information, sex, reproductive status, and age of individual.
- For presence/absence surveys, ODNR-DOW requires all female and juvenile state endangered and threatened bat species (Indiana, northern long-eared, little brown, and tricolored bat) be radio-tracked if

caught, in accordance with methods outlined in Appendix D of USFWS 2022 Range-wide Indiana Bat Summer Survey Guidelines.

- If you are taking any biological samples (tissue, fur, blood, etc.), this must be specifically authorized in your state and federal permits and noted in your survey proposal.

After Field Season:

By March 15, you must submit your final ODNR-DOW report(s) from the previous summer. You are not required to fill out the ODNR-DOW Wildlife Diversity Bat Excel Spreadsheet; instead, please forward your USFWS Midwestern US Spreadsheet (found here: <https://www.fws.gov/media/bat-reporting-spreadsheets-2020-2021>) to the ODNR-DOW Bat Survey Coordinator and ODNR-DOW Permit Coordinator and include your state permit number along with an electronic copy of the project report. Electronic summaries emailed during the field season are NOT considered as full compliance of this reporting requirement.

Ohio Environmental Review Recommendations for projects involving disturbance near potential/known bat hibernacula (cliffs, caves, mines) or tree cutting:

Step 1: Coordinate with Ohio Division of Wildlife (DOW) regarding existing records for state-listed endangered bat summer and/or winter occurrence information. Potential hibernacula found during a habitat assessment must address possible suitability for Indiana bats, northern long-eared bats, tricolored bats, and little brown bats.

If project site contains a known bat hibernaculum(a) –

- For state-listed endangered species other than the Indiana bat and northern long-eared bat, a recommendation of 0.25-mile tree cutting buffer around all known entrances to protect existing conditions at the hibernaculum(a). The U.S. Fish and Wildlife Service (USFWS) should be contacted for guidance on projects occurring within 5 miles of known or potential Indiana bat and/or northern long-eared bat hibernacula. If the project involves subsurface disturbance, consultation with DOW is required.
- Limited tree cutting may be permitted within the buffer. Coordinate with DOW.

If a project site does not contain known bat hibernaculum(a)

- Conduct a desktop habitat assessment of the project area. Tools such as the [ODNR Mines of Ohio Viewer](#), [Karst Interactive Map](#), topographic maps, aerial photos, historical records, etc. should be used to determine if there are any potential caves, mines, karst features, rock ledges, or other features that may serve as potential hibernacula.

- If no such features are found, proceed to Step 2.

- If potential hibernacula are found during the desktop assessment:

- Assume bats are using these hibernacula and refrain from clearing trees from March 15-November 15

-Or-

- Conduct a field habitat assessment to determine if a potential hibernaculum(a) is present within the action area. We encourage impacts to ledges and rock outcroppings be avoided. If impacts cannot be avoided, features should be evaluated for potential roosting characteristics such as recesses, overhangs, and crevices.

- **NOTE:** The USFWS Range-wide Indiana Bat Guidelines, Appendix H, contains instructions for completing a habitat assessment, but only includes criteria for Indiana bat hibernacula.

Step 2: When conducted, a presence/absence survey must follow current DOW guidelines.

Step 3: If a state-listed endangered bat is captured or recorded during the survey:

- Recommendation of no summer tree cutting, or limited cutting following guidelines detailed below, within 5 miles (or 2.5 miles for tricolored bats) of the capture site if a roost is not located.
- Recommendation of no summer tree cutting, or limited cutting following guidelines detailed below, within 2.5 miles of a roost tree if located.

If no state-listed endangered bat is captured or recorded during the survey:

- Summer tree cutting may proceed for 5 years before a new survey is needed under state guidance.

Limited summer tree cutting guidance for bats that are only state-listed endangered: Limited tree cutting in summer may be permitted after consultation with DOW, but clearing trees with the following characteristics should be avoided unless they pose a hazard: dead or live trees of any size with loose, shaggy bark; crevices, holes, or cavities; clusters of dead leaves; live trees of any species with DBH ≥ 20 ".

FREQUENTLY ASKED QUESTIONS

When does the ODNR-DOW Bat Survey protocol have to be used?

This protocol should be used anytime Indiana bat, northern long-eared bat, little brown bat, or tricolored bat summer presence/probable absence surveys are conducted in the state of Ohio.

How many detector nights are required for presence/probable absence acoustic surveys?

As described in the current USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines:

Level of effort for all state-listed endangered bat species including Indiana bat and northern long-eared bats: Follow maximum detector nights as outlined in the federal guidance (for northern long-eared bat).

Northern Long-eared Bat Level of Effort:

Linear projects: a minimum of 4 detector nights per km (0.6 miles) of suitable summer habitat

Non-linear projects: a minimum of 14 detector nights per 123 acres (0.5 km²) of suitable summer habitat.

At least 2 detector locations per 123 acre "site" shall be sampled until at least 8 detector nights has been completed over the course of at least 2 calendar nights (may be consecutive). For example:

- 4 detectors for 3 nights and 1 detector for 2 nights each (can sample the same location or move within the site)
- 2 detectors for 7 nights each (can sample the same location or move within the site)
- 1 detector for 14 nights (must sample at least 2 locations and move within the site – we recommend evenly distributing LOE among locations)

Indiana Bat Level of Effort:

Linear projects: a minimum of 4 detector nights per km (0.6 miles) of suitable summer habitat

Non-linear projects: a minimum of 10 detector nights per 123 acres (0.5 km²) of suitable summer habitat.

At least 2 detector locations per 123 acre "site" shall be sampled until at least 8 detector nights has been completed over the course of at least 2 calendar nights (may be consecutive). For example:

- 5 detectors for 2 nights each (can sample the same location or move within the site)
- 2 detectors for 5 nights each (can sample the same location or move within the site)
- 1 detector for 10 nights (must sample at least 2 locations and move within the site – we recommend evenly distributing LOE among locations)

How many net surveys are required for presence/probable absence?

Level of effort for all state-listed endangered bat species including Indiana bat and northern long-eared bats: Follow maximum net nights as outlined in the federal guidance (for northern long-eared bat).

Net surveys for northern long-eared bat presence/probable absence shall incorporate, at a minimum, either 10 net nights per square 0.5 kilometer (123 acres) of project area, or four net nights per kilometer for linear projects. For linear projects, there must be at least one net night of survey on two different nights (minimum of two nights). This does not allow for two net nights on a single night for surveys.

Net surveys for Indiana bat presence/probable absence shall incorporate, at a minimum, either six net nights net nights per square 0.5 kilometer (123 acres) of project area, or two net nights per kilometer for linear projects. For linear projects, there must be at least one net night of survey on two different nights (minimum of two nights). This

does not allow for two net nights on a single night for surveys.

How long are the results of the surveys valid for an assessment of an area?

Mist-net or acoustic surveys documenting probable absence of state-listed endangered bats are valid for five years.

When can acoustic or net surveys occur in Ohio?

In Ohio, acoustic or net surveys may only be conducted from June 1 through August 15 unless indicated otherwise in your state permit. Any surveys outside of the June 1 - August 15 timeframe cannot be used in Ohio to assess the presence/probable absence of state-listed bats.

Can a presence/probable absence survey be conducted within a known Indiana bat and/or northern long-eared bat capture/detection buffer?

Surveys generally cannot be used to document presence/probable absence of state-listed endangered bats where presence of the species has already been confirmed by prior surveys.

What if a project is proposing to clear trees between April 1 and September 30 when bats may be present but no bat records exist in the project area?

Any Ohio project that is not within a known bat record buffer, and tree clearing between April 1 and September 31 is being proposed, may have a presence/probable absence survey conducted between June 1 and August 15 following the range-wide guidance. If a presence/probable absence survey is not performed, presence of listed bats is assumed.

How does take of northern long-eared bats differ from Indiana bats?

Under Ohio law, there is no exemption for take of any listed bat species.

Where do I get bands?

If you need bands, email the ODNR-DOW Bat Survey Coordinator at least two weeks in advance with your current ODNR permit number, how many bands in each size (2.4 and 4.2 mm) you will need this season, and a current address to ship the bands.

Do I have to band every bat?

No, currently this is optional. However, you are required as per your state permit to band all Indiana, northern long-eared, little brown, and tricolored bats.

APPENDIX D: INITIAL ODNR LETTER AND BAT HIBERNACULA REVIEW



American Electric Power
8600 Smith's Mill Road
New Albany, OH 43054;
ajtoohey@aep.com

September 12, 2023

Attention: Mr. John Kessler
Ohio Department of Natural Resources
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693

Transmitted via email: environmentalreviewrequest@dnr.state.oh.us;
NHDRequest@dnr.state.oh.us

**Reference: Project Review Request
Harrison Extension 138 kV Transmission Line,
Franklin and Pickaway Counties, Ohio**

Mr. Kessler:

AEP Ohio Transmission Company, Inc. (AEP), is formally requesting that the Ohio Department of Natural Resources (ODNR) completes an environmental review and a Natural Heritage Database (NHD) search request for the proposed Harrison Extension 138 kilovolt (kV) Transmission Line Project (Project) located in Franklin and Pickaway Counties, Ohio (OH). The Project consists of the replacement of six existing structures (Structure 1, 14, 25, 26, 33, and 34) with a pole-to-pole replacement to increase the height of the transmission line along a cumulative 1.05-miles of the existing Harrison Extension 138 kV Transmission Line. The proposed survey area is approximately 17.44 acres and is located on the United States Geological Survey (USGS) Lockbourne, OH 7.5-minute topographical quadrangle as displayed on the Topographic Project Overview (Figure 1).

AECOM Technical Services, Inc. (AECOM) completed a desktop review of publicly available data to identify abandoned underground mines within 0.25-mile of the Project area. The data sources utilized included USGS topographical maps, aerial photography, and the ODNR's Division of Mineral Resources and Geological Survey Data for Known Mining Activity and Karst Geology/Sinkholes as shown on Figures 1 and 2. Based on the available desktop resources, there are no underground mines and/or karst features located within a 0.25-miles radius of the Project area that are anticipated to provide suitable hibernacula for cave-dwelling bats.

AECOM respectfully requests the results of the ODNR's environmental review, including results of the ODNR Natural Heritage Database search (see attached NHD Request Form) at your earliest convenience. If you have questions or need additional information regarding the Project, please contact me at the phone number or email below. Thank you for your assistance with this request.

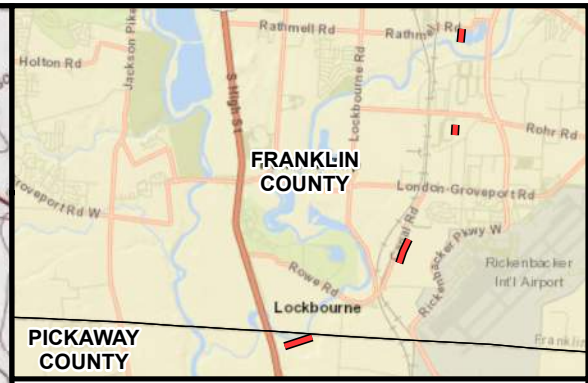
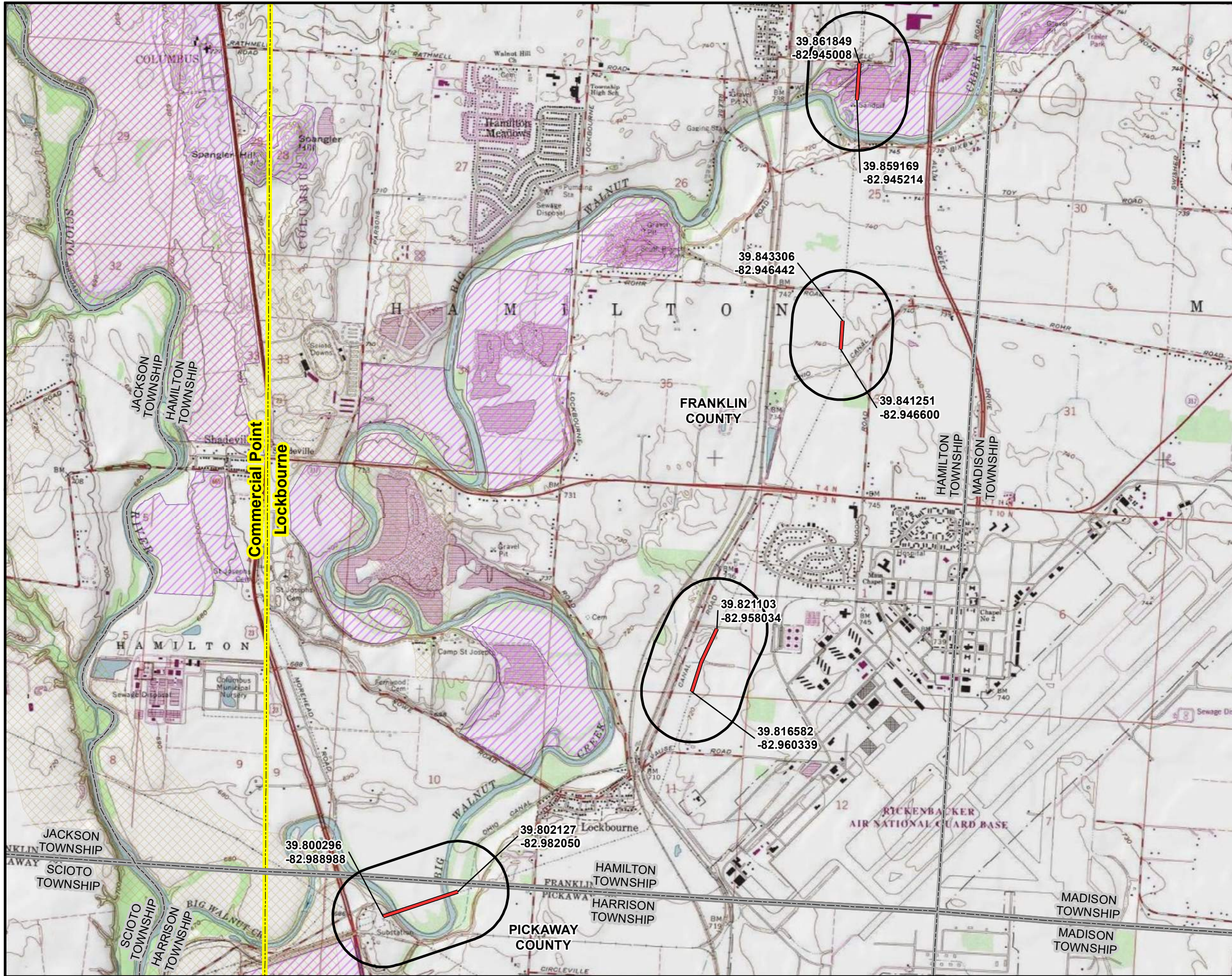
Sincerely,

Brian Miller
Environmental Project Manager
Phone: (412-667-9172); brian.miller1@aecom.com

CC: Amy J. Toohey
Environmental Specialist-Consultant
Phone: (614-565-1480); ajtoohey@aep.com

Attachments (3): Figure 1 – Topographic Project Overview; Figure 2 – Aerial Project Overview; NHD Request Form; Electronic Shapefiles(.shp)

BOUNDLESS ENERGY™



Legend

- Harrison Extension 138 kV Transmission Line
- Quarter Mile Review Boundary
- Surface Industrial Minerals Mine Operation
- Karst Geology (Ohio Department of Geologic Survey)
- Ohio USGS 7.5' Topographic Quadrangle
- Township Boundary
- County Boundary

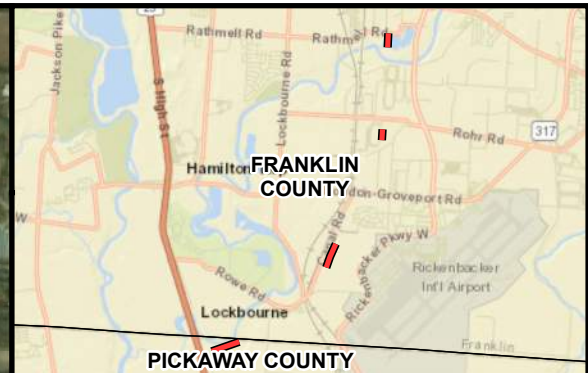
N

0 2,400 4,800

Feet

Harrison Extension 138 kV Transmission Line Project

FIGURE 1 TOPOGRAPHIC PROJECT OVERVIEW	
DATE: 9/12/2023	1 INCH = 2,500 FEET
CREATED BY: AH	CHECKED BY: BG
JOB NO.: 60715639	AECOM



Legend

- Harrison Extension 138 kV Transmission Line
- Quarter Mile Review Boundary
- Surface Industrial Minerals Mine Operation
- Karst Geology (Ohio Department of Geologic Survey)
- Ohio USGS 7.5' Topographic Quadrangle
- Township Boundary
- County Boundary

N

0 2,500 5,000

Feet

Harrison Extension 138 kV Transmission Line Project

FIGURE 2 AERIAL PROJECT OVERVIEW	
DATE: 9/12/2023	1 INCH = 2,500 FEET
CREATED BY: AH	CHECKED BY: BG
JOB NO.: 60715639	AECOM

APPENDIX E: USACE DATA FORM AND PHOTOGRAPHS

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Midwest Region
 See ERDC/EL TR-10-16; the proponent agency is CECW-CO-R

OMB Control #: 0710-0024, Exp:11/30/2024
 Requirement Control Symbol EXEMPT:
 (Authority: AR 335-15, paragraph 5-2a)

Project/Site: Harrison EXT STR 25 and 26 City/County: Franklin Sampling Date: 09/05/2023
 Applicant/Owner: AEP State: OH Sampling Point: UPL-HLA-002
 Investigator(s): HLA, RBL (AECOM) Section, Township, Range: T4N R22W
 Landform (hillside, terrace, etc.): Plains Local relief (concave, convex, none): Concave
 Slope (%): 1 Lat: 39.84269 Long: -82.94648 Datum: WGS 84
 Soil Map Unit Name: CrA: Crosby silt loam, Southern Ohio Till Plain, 0 to 2 percent slopes NWI classification: None
 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>X</u> No <u> </u>	Is the Sampled Area within a Wetland? Yes <u> </u> No <u>X</u>
Hydric Soil Present? Yes <u> </u> No <u>X</u>	
Wetland Hydrology Present? Yes <u>X</u> No <u> </u>	

Remarks:

Data point in study area to characterize site, near culvert outlet, surrounded by narrow old field strip to west and maintained lawn to east. Hydrophytic vegetation indicator (dominance test) is present, however only FAC plants are present, and not indicative of true wetland vegetation. Multiple

VEGETATION – Use scientific names of plants.

<u>Tree Stratum</u> (Plot size: <u>30'r</u>)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>1</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)
1. <u>None</u>				
2. <u> </u>				
3. <u> </u>				
4. <u> </u>				
5. <u> </u>				
	=Total Cover			Prevalence Index worksheet: 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>80</u> x 3 = <u>240</u> FACU species <u>20</u> x 4 = <u>80</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>320</u> (B) Prevalence Index = B/A = <u>3.20</u>
<u>Sapling/Shrub Stratum</u> (Plot size: <u>15'r</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>None</u>				
2. <u> </u>				
3. <u> </u>				
4. <u> </u>				
5. <u> </u>				
	=Total Cover			
<u>Herb Stratum</u> (Plot size: <u>5'r</u>)	Absolute % Cover	Dominant Species?	Indicator Status	Hydrophytic Vegetation Indicators: <u> </u> 1 - Rapid Test for Hydrophytic Vegetation <u>X</u> 2 - Dominance Test is >50% <u> </u> 3 - Prevalence Index is ≤3.0 ¹ <u> </u> 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <u> </u> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Poa pratensis</u>	<u>75</u>	<u>Yes</u>	<u>FAC</u>	
2. <u>Trifolium pratense</u>	<u>10</u>	<u>No</u>	<u>FACU</u>	
3. <u>Trifolium repens</u>	<u>10</u>	<u>No</u>	<u>FACU</u>	
4. <u>Setaria pumila</u>	<u>3</u>	<u>No</u>	<u>FAC</u>	
5. <u>Plantago major</u>	<u>2</u>	<u>No</u>	<u>FAC</u>	
6. <u> </u>				
7. <u> </u>				
8. <u> </u>				
9. <u> </u>				
10. <u> </u>				
	<u>100</u> =Total Cover			
<u>Woody Vine Stratum</u> (Plot size: <u>30'r</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>None</u>				
2. <u> </u>				
	=Total Cover			

Remarks: (Include photo numbers here or on a separate sheet.)
 Hydrophytic vegetation indicator present, as dominance test >50%.

SOIL

Sampling Point: UPL-HLA-002

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 ¹	Loc ²		
0-12	10YR 5/4	100					Sandy	

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

²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:	Indicators for Problematic Hydric Soils ³ :
<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)	

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

Restrictive Layer (if observed): Type: <u> </u> Compacted soil Depth (inches): <u> </u> 12	Hydric Soil Present? Yes <u> </u> No <u> X </u>
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Remarks:
Hydric soil indicators absent. Soil heavily compacted beyond 12 inches.

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 checked="" type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Stunted or Stressed Plants (D1)
<input checked="" type="checkbox"/> Algal Mat or Crust (B4)	<input checked="" type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	
<input type="checkbox"/> Water-Stained Leaves (B9)	
<input type="checkbox"/> Aquatic Fauna (B13)	
<input type="checkbox"/> True Aquatic Plants (B14)	
<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	
<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)	
<input type="checkbox"/> Presence of Reduced Iron (C4)	
<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	
<input type="checkbox"/> Thin Muck Surface (C7)	
<input type="checkbox"/> Gauge or Well Data (D9)	
<input type="checkbox"/> Other (Explain in Remarks)	

Field Observations: Surface Water Present? Yes <u> </u> No <u> X </u> Depth (inches): <u> </u> Water Table Present? Yes <u> </u> No <u> X </u> Depth (inches): <u> </u> Saturation Present? Yes <u> </u> No <u> X </u> Depth (inches): <u> </u> (includes capillary fringe)	Wetland Hydrology Present? Yes <u> X </u> No <u> </u>
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Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Several hydrology indicators present.

Client Name: AEP	Site Location: Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement Project	Project No. 60715639
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UPL-HLA-002
Date: September 5, 2023
Description: Upland Data Point Facing North



UPL-HLA-002
Date: September 5, 2023
Description: Upland Data Point Facing East



Client Name: AEP	Site Location: Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement Project	Project No. 60715639
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UPL-HLA-002	
Date: September 5, 2023	
Description: Upland Data Point Facing South	

UPL-HLA-002	
Date: September 5, 2023	
Description: Upland Data Point Facing West	

Client Name: AEP	Site Location: Harrison Extension 138 kV Transmission Line, Structures 25 & 26 Replacement Project	Project No. 60715639
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UPL-HLA-002
Date: September 5, 2023
Description: Upland Data Point Facing Soil

