

# Construction Notice for the Bell Ridge 138kV Switch Project



An **AEP** Company

---

BOUNDLESS ENERGY™

PUCO Case No. 20-1136-EL-BNR

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

Submitted by:  
AEP Ohio Transmission Company, Inc.

June 18, 2020

## CONSTRUCTION NOTICE FOR BELL RIDGE 138kV SWITCH PROJECT

### CONSTRUCTION NOTICE

AEP Ohio Transmission Company, Inc.  
Bell Ridge 138 kV Switch Project

#### **4906-6-05**

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

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

##### **B(1) Project Description**

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

The Company is proposing the Bell Ridge 138kV Switch Project ("Project"), located in Lawrence Township, Washington County, Ohio. The Project involves installing a new three-way phase over phase switch (the "Bell Ridge Switch") and approximately 150 feet of 138 kV transmission line into Washington Electric Cooperative's ("WEC") Lawrence Station. The Bell Ridge Switch will be installed along the Rouse-Bell Ridge and Bell Ridge-Devola 138 kV Transmission lines, which are currently under construction (Case No. 17-1908-EL-BTX and 17-1907-EL-BTX). Appendix A, Figures 1 and 2 show the location of the Project in relation to the surrounding vicinity.

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

1. *New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*
  - (a) *Line(s) not greater than 0.2 miles in length.*
  
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 Case No. 20-1136-EL-BNR.

## CONSTRUCTION NOTICE FOR BELL RIDGE 138kV SWITCH PROJECT

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

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

The Company is proposing to install the Bell Ridge Switch and a single span radial extension to serve WEC's new Lawrence 138/12 kV Station. Lawrence Station will serve distribution customers currently served from WEC's existing Dart and Leith Run delivery points currently served by AEP Ohio Power Company's 23 kV line between Mill Creek and Wade Switch. The Project will provide 138 kV service to WEC's new delivery point by tying Lawrence Station into the Company's proposed Rouse-Bell Ridge 138 kV and Bell Ridge-Devola 138 kV circuits filed in Case Nos. 17-1908-EL-BTX and 17-1907-EL-BTX, respectively.

The need and solution for this Project were presented and reviewed with stakeholders at the July 26th, 2016 PJM SRRTEP Western meeting. The Project was subsequently assigned PJM project number s1160. The Project is also included in the Company's 2020 Long Term Forecast Table FE-T9 page 62 of 87 (see Appendix B).

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

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

The location of the Project in relation to existing transmission lines and stations is shown on Figure 1, in Appendix A. Figure 2, in Appendix A, identifies the Project components on a 2017 aerial photograph.

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

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

As the new structure will be placed within the centerline of the existing Rouse-Bell Ridge 138 kV transmission line, and the Lawrence Station is located approximately 150 feet west of the transmission lines under construction, the resulting alignments represent the most suitable and least impactful Project solution. Therefore, no alternatives were considered as part of this Project.

# CONSTRUCTION NOTICE FOR BELL RIDGE 138KV SWITCH PROJECT

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

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

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.**

Construction of the Project is planned to begin in October 2020 with an anticipated in-service date of January 2021.

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

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

Figure 1, in Appendix A, identifies the location of the Project area on a United States Geological Survey 1:24,000 quadrangle map. Appendix A, Figure 2 is an aerial map of the Project area.

To visit the Project from downtown Columbus, Ohio, take I-70 East towards Wheeling for approximately 78 miles. Next, take exit 180A to merge onto I-77S toward Marietta and continue for 38 miles. Take exit 6 for OH-821 toward Marietta/Lower Salem. Turn right onto OH-821 and continue for 1.3 miles before turning left onto C375/Glendale Road. Continue for approximately 1 mile before turning left onto C42/Stanleyville Road and following Stanleyville Road for approximately 7.5 miles. Next, turn right onto Moss Run Road and continue for approximately 3 miles. Turn left onto OH-26N and continue for 2.1 miles before turning left onto T644. The Project will be located on the north side of T644 at latitude 39.478167, longitude -81.278204.

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

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

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

<b>Property Parcel Number</b>	<b>Easement/ Option Obtained (Yes/No)</b>
180066376000	Yes

## CONSTRUCTION NOTICE FOR BELL RIDGE 138kV SWITCH 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.**

The transmission line construction along the Project are anticipated to include the following:

Voltage:	138 kV
Conductors:	(3) 795 kcmil 26/7 ACSR – DRAKE
Static Wire:	(1) 7#8 Alumoweld
Insulators:	Polymer deadends
ROW Width:	100 feet
Structure Types:	One (1) steel monopole 3-way GOAB switch on a concrete pier foundation

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

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

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

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

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

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

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

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

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

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

The capital costs estimate for the Project is approximately \$600,000 (Class 4 estimate).

## CONSTRUCTION NOTICE FOR BELL RIDGE 138KV SWITCH PROJECT

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

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

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

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

The Project is located in Lawrence Township, Washington County, Ohio. Land use in the Project area consists of old field and open land. The Rake Cemetery is located approximately 100 feet east of the Project.

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

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

The Project is not located within registered agricultural district lands, based on coordination with the Washington County Auditor's Office on June 4, 2020. Additionally, the Project area does not contain any active agricultural row crop land.

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

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

The Project was covered under previous cultural resource surveys conducted for the Rouse-Bell Ridge 138 kV Transmission Line Project (Case No. 17-1908-EL-BTX) in 2018 and 2019 (see Appendix C). The survey concluded that no adverse effects are expected as a result of this Project.

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

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

The existing Storm Water Pollution Prevention Plan ("SWPPP") for the Rouse-Bell Ridge 138 kV Transmission Line Project will be amended to include the Project. A Notice of Intent was filed with the Ohio Environmental Protection Agency for authorization of construction stormwater discharges under General Permit OHC000005, and the Company will implement and maintain best management practices (BMPs), as outlined in the project-specific SWPPP, to minimize erosion and control sediment to protect surface water quality during storm events.

## CONSTRUCTION NOTICE FOR BELL RIDGE 138KV SWITCH PROJECT

The Project, as currently planned, would not impact any wetlands or waterways.

The Project is not located within a Federal Emergency Management Agency (FEMA) 100-year floodplain area. Therefore, no floodplain permitting is required for the Project.

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

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

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

Coordination with Ohio Department of Natural Resources (ODNR) Division of Wildlife (DOW) was initiated for this Project as part of the Rouse-Bell Ridge 138 kV Transmission Line Project (Case No. 17-1908-EL-BTX), to obtain Ohio Natural Heritage Database records within a 1-mile radius of the Project study area. A response from ODNR was received on July 18, 2017, see Appendix D. No in water work is anticipated for the Project and habitat surveys (see Appendix D) were conducted for the Indiana bat (*Myotis sodalis*) therefore, ODNR concurs that this Project is not likely to impact any of the listed species.

The USFWS *Federally Listed Species by Ohio Counties January 2018* (available at <https://www.fws.gov/midwest/endangered/lists/pdf/OhioCtyList29Jan2018.pdf>) was reviewed to determine the threatened and endangered species currently known to occur in Washington County, Ohio. This USFWS publication listed the following threatened or endangered species as occurring in Washington County: Indiana bat (*Myotis sodalis*; federally endangered), northern long-eared bat (*Myotis septentrionalis*; federally threatened), fanshell (*Cyprogenia stegaria*; federally endangered), pink mucket pearly mussel (*Lampsilis abrupta*; federally endangered), sheepsnose (*Plethobasus cyphus*; federally endangered), snuffbox (*Epioblasma triquetra*; federally endangered).

As part of the ecological study completed for the Project, a coordination letter was submitted to the USFWS Ohio Ecological Services Field Office seeking technical assistance on the Project for potential impacts to threatened or endangered species. The USFWS indicated, in a response letter dated September 14, 2017, that the proposed Project is within the range of the Indiana bat and northern long-eared bat in Ohio but not within known Indiana bat buffers. A habitat survey was conducted for the Project area and USFWS concluded that year round tree clearing is unlikely to result in adverse impacts to Indiana bats and will not result in any unauthorized incidental take of northern long-eared bats (see Appendix D). The USFWS also indicated the eastern hellbender (*Cryptobranchus a. alleghaniensis*) was within the Project area. However, as no in water work is anticipated for the Project, impacts to the eastern hellbender are not likely to occur. The USFWS letter did not include comments specific to the other federally listed species.

## CONSTRUCTION NOTICE FOR BELL RIDGE 138KV SWITCH PROJECT

Based on the nature of the proposed Project activities and habitat characteristics of the surrounding vicinity, construction impacts to protected species are not anticipated.

### **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.**

A review of the National Wetlands Inventory (NWI) database indicated that there were no NWI-mapped wetlands identified within the Project area. Additionally, ecological field surveys were conducted for the Project in 2017 and no wetlands or streams were identified along the Project (Figure 3, Appendix A).

No properties identified in the National Conservation Easement Database (<http://www.conservationeasement.us>) were identified in the Project vicinity.

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 39167C0300F). Based on this mapping, no mapped FEMA floodplains are located in the Project area.

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

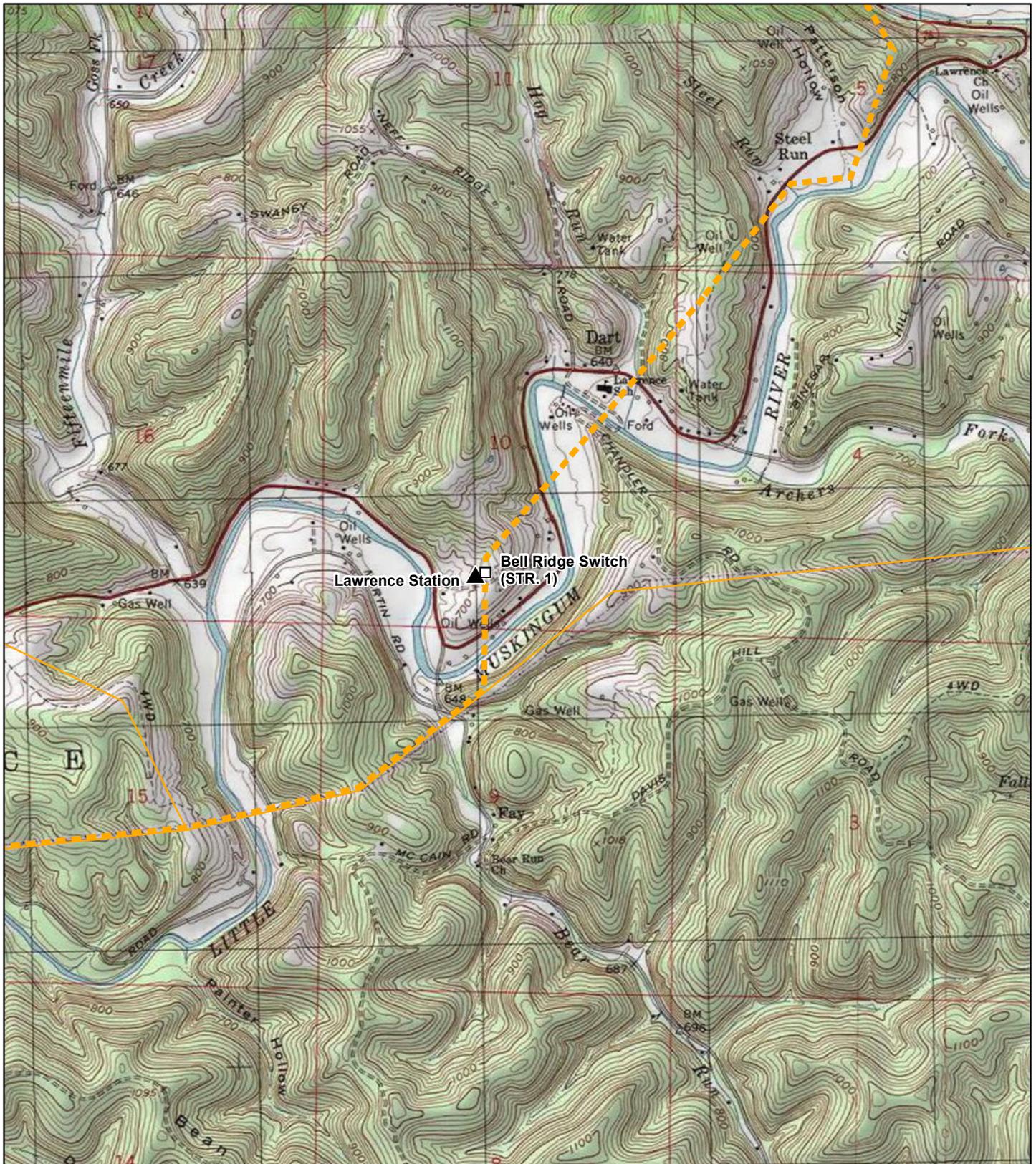
**Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.**

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

CONSTRUCTION NOTICE FOR BELL RIDGE 138kV SWITCH PROJECT

**Appendix A Project Maps**

Figures 1 through 3



- Bell Ridge Switch
- ▲ Washington Electric Cooperative Station
- 69kV Transmission Line
- - - 138kV Transmission Line (Under Construction)

Data Sources: AEP, USGS

Coordinate System and Datum  
NAD 83 State Plane  
Ohio South



June 09, 2020



**FIGURE 1**  
**TOPOGRAPHIC OVERVIEW**



Bell Ridge 138kV Switch Project





<ul style="list-style-type: none"> <li>□ Bell Ridge Switch</li> <li>▲ Lawrence Station</li> <li>†† Cemetery</li> <li>— Proposed Route</li> <li>- - - 138kV Transmission Line (Under Construction)</li> <li>▭ Parcel Boundaries (Corelogic)</li> </ul>	<p>Base Map Source: USDA NAIP 2017</p> <hr/> <p>Coordinate System and Datum NAD 83 State Plane Ohio South</p> <p style="text-align: center;">  </p> <p style="text-align: center;">June 09, 2020</p>		<p style="text-align: center;"><b>FIGURE 2</b> <b>AERIAL MAP</b></p> <hr/> <p style="text-align: center;"><b>Bell Ridge 138kV Switch Project</b></p> <div style="display: flex; align-items: center;">  <div style="text-align: center;">  <p>0    40    80    120    160 Feet</p> </div> </div>
---	---	--	--



<ul style="list-style-type: none"> <li>□ Bell Ridge Switch</li> <li>▲ Lawrence Station</li> <li>†† Cemetery</li> <li>— Proposed Route</li> <li>- - - 138kV Transmission Line (Under Construction)</li> <li>— Delineated Stream</li> <li>▭ Parcel Boundaries (Corelogic)</li> </ul>	<p>Base Map Source: USDA NAIP 2017</p> <hr/> <p>Coordinate System and Datum NAD 83 State Plane Ohio South</p> <p style="text-align: center;">June 09, 2020</p>		<p style="text-align: center;"><b>FIGURE 3</b> <b>DELINEATED STREAMS MAP</b></p> <hr/> <p style="text-align: center;"><b>Bell Ridge 138kV Switch Project</b></p> <div style="text-align: center;"> <p>ROUNDLESS ENERGY™</p> </div> <hr/> <div style="text-align: center;"> <p>0    40    80    120    160</p> <p>Feet</p> </div>
--	--	--	--

CONSTRUCTION NOTICE FOR BELL RIDGE 138KV PROJECT

**Appendix B 2020 Long Term Forecast Report**

PUCO FORM FE-T9  
 AEP OHIO TRANSMISSION COMPANY  
 SPECIFICATIONS OF PLANNED TRANSMISSION LINES

1.	LINE NAME AND NUMBER:	Lamping-Devola (s1160)
2.	POINTS OF ORIGIN AND TERMINATION	Lamping, Devola; INTERMEDIATE STATION - Bell Ridge, Rouse
3.	RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS	~26 mi / 100 ft / 1 circuit
4.	VOLTAGE: DESIGN / OPERATE	138kV / 138kV
5.	APPLICATION FOR CERTIFICATE:	Full Application December, 2017
6.	CONSTRUCTION:	2020
7.	CAPITAL INVESTMENT:	\$65M
8.	PLANNED SUBSTATION:	NAME - Rouse, Bell Ridge; TRANSMISSION VOLTAGE - 138 kV; ACREAGE - 6, 6; LOCATION - Marietta, Ohio
9.	SUPPORTING STRUCTURES:	Steel H-frame
10.	PARTICIPATION WITH OTHER UTILITIES	Buckeye Coop/WEC
11.	PURPOSE OF THE PLANNED TRANSMISSION LINE	This new 138kV line will serve the Washington Electric Rouse and Bell Ridge stations.
12.	CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION	Foregoing this project would perpetuate the Marietta's 23kV reliability problems.
13.	MISCELLANEOUS:	N/A

CONSTRUCTION NOTICE FOR BELL RIDGE 138KV SWITCH PROJECT

**Appendix C OHPO Correspondence**



In reply, refer to  
2017-WAS-38809

October 25, 2019

Amy C. Favret  
Jacobs Engineering Group, Inc.  
1880 Waycross Rd.  
Cincinnati, OH 45240  
[amy.favret@jacobs.com](mailto:amy.favret@jacobs.com)

**RE: Rouse to Bell Ridge 138kV Transmission Line Project, Monroe and Washington Counties, Ohio**

Dear Ms. Favret:

This letter is in response to the correspondence received on September 27, 2019 and October 23, 2019 regarding the proposed Rouse to Bell Ridge 138kV Transmission Line Project, Monroe and Washington Counties, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-4). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Reconnaissance for the Rouse to Bell Ridge, 138 kV Transmission Line Project in Wayne National Forest, Washington Township, Monroe County and Lawrence Township, Washington County, Ohio* by Jacobs Engineering Group, Inc. (2018).

A literature review, visual inspection, shovel test unit excavation was completed as part of the investigations. No previously identified cultural resources are located within the survey area. One (1) new archaeological site was identified during survey. Ohio Archaeological Inventory (OAI) 33MO0207 is a historic site consisting of structure ruins and historic debris. The site was not recommended eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation. Based on the information provided, we agree no further archaeological work is necessary.

The following comments pertain to the *Rouse to Bell Ridge, 138 kV Transmission Line Project in Washington Township, Monroe County and Ludlow, Independence, and Lawrence Townships, Washington County, Ohio, Addendum Report, Phase I Archaeological Reconnaissance* by Jacobs Engineering Group, Inc. (2019).

A literature review, visual inspection, surface collection and shovel test unit excavation was completed as part of the investigations. No previously identified cultural resources are located within the survey area. No new archaeological resources were identified during survey. Based on the information provided, we agree no further archaeological work is necessary.

The following comments pertain to the letter titled *Supplemental Archaeological Resources Study and Request for Section 106 Concurrence: AEP Ohio Transco Rouse to Bell Ridge 138 kV Transmission Line Project, in Wayne National Forest, Washington Township, Monroe County, and Lawrence Township, Washington County, Ohio* by Jacobs Engineering Group, Inc. (2019).

RPR Serial No: 1080957, 1081234

Ms. Favret  
Page 2  
October 25, 2019

A literature review and visual inspection was completed as part of the investigations. The entirety of the study area, approximately 6.62 miles in length, is located on existing County roads. No previously identified cultural resources are located within the survey area and no new cultural resources were identified. Based on the information provided, we agree no further archaeological work is necessary.

The following comments pertain to the letter titled *Architectural and Historic Resources: AEP Ohio Transco Bell Ridge to Devola 138 kV Transmission Line Project and Rouse to Bell Ridge 138 kV Transmission Line Project, Areas Within the Wayne National Forest, Monroe and Washington Counties, Ohio* by Jacobs Engineering Group, Inc. (2019).

Mapping and aerial photography research was paired with the field survey team's archaeological activities resulting in no new above-ground resources being located within the APE. As such, we agree that no additional architectural/historical work is required.

The following comments pertain to the letter titled *Supplemental Architectural and Historic Resources Study: AEP Ohio Transco Rouse to Bell Ridge 138 kV Transmission Line Project, Washington Township, Monroe County, and Ludlow, Independence, and Lawrence Townships, Washington County, Ohio* by Jacobs Engineering Group, Inc. (2019).

The supplemental architectural and historical resources study was conducted for newly selected access roads associated with the project. During the field survey, Jacobs determined that each of the proposed access roads uses existing roads and/or pathways and no vegetative clearing will be required in the vicinities of above-ground buildings or structures. As such, we agree that no additional architectural/historical work is required.

Based on the information provided, we agree the project will not affect historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted.

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

Sincerely,



Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

cc: Amy Toohe, AEP ([ajtoohey@aep.com](mailto:ajtoohey@aep.com))  
Andrew H. Tremayne, USDA ([Andrew.tremayne@usda.gov](mailto:Andrew.tremayne@usda.gov))  
Chris Yeager, FS ([cyeager@fs.fed.us](mailto:cyeager@fs.fed.us))

RPR Serial No: 1080957, 1081234

**OHIO HISTORY CONNECTION**

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • [ohiohistory.org](http://ohiohistory.org)



In reply, refer to  
2017-WAS-38809

July 19, 2018

Amy C. Favret  
JACOBS ch2m  
1880 Waycross Road  
Cincinnati, OH 45240  
[Amy.favret@jacobs.com](mailto:Amy.favret@jacobs.com)

**RE: Rouse to Bell Ridge, 138 kV Transmission Line Project, Washington Township, Monroe County and Ludlow, Independence, and Lawrence Townships, Washington County, Ohio**

Dear Ms. Favret:

This letter is in response to the correspondence received on June 18, 2018, and the completed Ohio Historic Inventory (OHI) form on July 19, 2018, regarding the proposed Rouse to Bell Ridge, 138 kV Transmission Line Project, Washington Township, Monroe County and Ludlow, Independence, and Lawrence Townships, Washington County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-4). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Reconnaissance for the Rouse to Bell Ridge, 138 kV Transmission Line Project in Washington Township, Monroe County and Ludlow, Independence, and Lawrence Townships, Washington County, Ohio* by JACOBS ch2m (2018).

A literature review, visual inspection, pedestrian survey, shovel probe excavation, and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological sites are located within the project area. Six (6) new Ohio Archaeological Inventory (OAI) sites were identified during this survey. OAI#33MO0203, 33MO0204, 33WN0504, and 33WN0506 are historic archaeological sites identifying previous structure locations and/or historic scatters. OAI#33WN0505 and 33WN0507 are multicomponent sites identifying historic scatters that also contain a prehistoric component that could not be assigned to a temporal period. None of the sites were recommended eligible for listing in the National Register of Historic Places (NRHP). Based on the information provided, we agree the sites identified are not eligible for listing in the NRHP and no additional archaeological investigation is recommended on these sites.

It is our understanding that additional access roads and alignment re-routes were added after fieldwork had been completed for the attached report. There are also portions of the project area located within Wayne National Forest which require an Archaeological Resources Protection Act (ARPA) permit before Phase I investigations can take place. We look forward to continued coordination with JACOBS ch2m regarding the additional archaeological investigations.

The following comments pertain to the *Architectural and Historical Resources Report: AEP Ohio Transco Rouse to Bell Ridge 138 kV Transmission Line Project, Washington Township, Monroe County, and Ludlow, Independence, and Lawrence Townships, Washington County, Ohio* by JACOBS ch2m (2018).

RPR Serial No: 1074436, 1074453

Ms. Amy C. Favret  
Page 2  
July 19, 2018

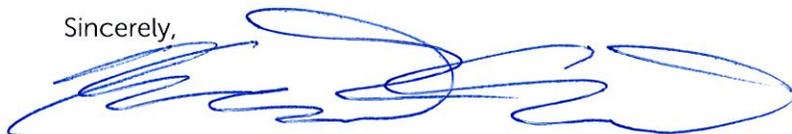
The investigations included background research, field survey, and assessment of effects for the established Area of Potential Effects. The APE is defined as a maximum of 1,000' on either side of the proposed centerline for the entire 12.8-mile length of the project. Twenty-four (24) architectural and historical resources were identified within the APE. Out of the twenty-four properties identified, two are listed in the NRHP: the William Hune Farm (Ref. 91000303) and the Hune Covered Bridge (Ref. 76001545). Additionally, one newly recorded property was identified for effects assessment.

JACOBS ch2m recommends the Lawrence Elementary School (WAS0297111) as eligible for inclusion in the NRHP under Criterion A at the local level for its association with education in Lawrence Township in the 20<sup>th</sup> century. Our office agrees with JACOBS ch2m's recommendation of eligibility.

The information provided suggests that the new project will be minimally visible, if visible at all, from the William Hune Farm and Hune Covered Bridge. While portions of the new project will be fully visible from Lawrence Elementary School, an existing transmission line has already impacted the surroundings. Furthermore, the school does not derive its significance from its surroundings. Therefore, we agree with JACOBS ch2m's finding that the project as proposed will have no effect on historic properties.

Based on the information provided, we agree the project will not currently affect historic properties. We look forward to additional coordination regarding the additional access roads and alignment re-routes. If you have any questions, please contact me at (614) 298-2022, or by e-mail at [khorrock@ohiohistory.org](mailto:khorrock@ohiohistory.org), or Joy Williams at [jwilliams@ohiohistory.org](mailto:jwilliams@ohiohistory.org). Thank you for your cooperation.

Sincerely,



Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

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

RPR Serial No: 1074436, 1074453

**OHIO HISTORY CONNECTION**

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • [ohiohistory.org](http://ohiohistory.org)

CONSTRUCTION NOTICE FOR BELL RIDGE 138kV SWITCH PROJECT

**Appendix D USFWS and ODNR Correspondence**



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

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

July 18, 2017

Nancy Cochran  
CH2M  
9191 South Jamaica Street  
Englewood, CO 8011

**Re:** 17-345; Environmental Review of Rouse to Bell Ridge 138-kilovolt (kV) Transmission Line Project

**Project:** The proposed project involves the construction of a new 16-mile 138-kilovolt (kV) transmission line.

**Location:** The proposed project is located in Monroe and Washington Counties, Ohio.

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

**Natural Heritage Database:** The Natural Heritage Database has the following records at or within a one mile radius of the project area:

Appalachian oak forest plant community  
Eastern sand darter (*Ammocrypta pellucida*), SC, FSC  
Ohio lamprey (*Ichthyomyzon bdellium*), E  
Eastern hellbender (*Cryptobranchus alleganiensis*), E, FSC  
Green-faced clubtail (*Gomphus viridifrons*), T  
Uhler's sundragon (*Helocordulia uhleri*), E  
Blue corporal (*Ladona deplanata*), E  
Mussel bed  
Wayne National Forest – US Forest Service

The review was performed on the project area specified in the request as well as an additional one mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

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

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

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

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

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

This project must not have an impact on freshwater native mussels at the project site. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2016), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 10 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. This is further explained within the Ohio Mussel Survey Protocol. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, as a last resort, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. The Ohio Mussel Survey Protocol (2016) can be found at:

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

The project is within the range of the Ohio lamprey (*Ichthyomyzon bdellium*) a state endangered fish, the channel darter (*Percina copelandi*), a state threatened fish, the Tippecanoe darter (*Etheostoma tippecanoe*), a state threatened fish, and the river darter (*Percina shumardi*), a state threatened fish. The DOW recommends no in-water work in perennial streams from April 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. If in-water work is proposed in the Little Muskingum River, or Clear Fork, the DOW recommends that a habitat suitability survey be conducted by a DOW approved herpetologist to determine if suitable habitat for the eastern hellbender exists along the project route. If suitable habitat is identified, the DOW recommends that a presence/absence survey be conducted by the approved herpetologist. If no in-water work proposed in the above identified streams, this project is not likely to impact this species.

The project is within the range of the eastern spadefoot toad (*Scaphiopus holbrookii*), a state endangered species. This species is found in areas of sandy soils that are associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions. Due to the location, the habitat along the project route, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, this project is not likely to impact this species.

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

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

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

[http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List\\_8\\_16.pdf](http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf)

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler

ODNR Office of Real Estate  
2045 Morse Road, Building E-2  
Columbus, Ohio 43229-6693  
John.Kessler@dnr.state.oh.us

# 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

September 14, 2017

Mike Frank  
CH2M  
400 E Business Way  
Suite #400  
Cincinnati, Ohio 45241

TAILS# 03E15000-2017-TA-1886

Re: AEP Rouse to Bell Ridge Transmission Line, Washington and Monroe Counties, OH

Dear Mr. Frank,

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

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). As you have indicated, the proposed transmission line does cross through portions of Wayne National Forest. Therefore, we recommend that you contact Rachel Orwan at [rorwan@fs.fed.us](mailto:rorwan@fs.fed.us) to coordinate the proposed project with them. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

**FEDERALLY LISTED SPECIES COMMENTS:** All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or

cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

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

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

**SPECIES OF CONCERN COMMENTS:** The proposed project lies within the range of the **eastern hellbender** (*Cryptobranchus a. alleganiensis*), a Federal amphibian species of concern and an Ohio endangered species. The eastern hellbender is a salamander that inhabits perennial streams with large, flat rocks and is known to occur in the Little Muskingum River. Should the proposed project directly or indirectly impact any of the habitat types described above, we recommend that a survey be conducted to determine the presence or probable absence of the eastern hellbender in the vicinity of the proposed project site. The following herpetologists are authorized to conduct hellbender surveys within the State of Ohio:

Jeff Davis  
625 Crescent Road  
Hamilton, OH 45013  
[anura@fuse.net](mailto:anura@fuse.net)  
(513) 868-3154

Greg Lipps  
1473 County Road 5-2  
Delta, OH 43515  
[GregLipps@aol.com](mailto:GregLipps@aol.com)  
(419) 376-3441

Doug Wynn  
241 Chase Street, Apt. A3L  
Russells Point, OH 43348  
[Sistrurus@aol.com](mailto:Sistrurus@aol.com)  
(614) 306-0313

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

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at [john.kessler@dnr.state.oh.us](mailto:john.kessler@dnr.state.oh.us).

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

Sincerely,



Dan Everson  
Field Supervisor

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

**CAUTION:** This email originated from outside of our organization. DO NOT click links or open attachments unless you recognize the sender and know the content is safe!



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



TAILS# 03E15000-2019-TA-1917

Dear Mr. Sparks,

We have received your summer bat survey report for the subject project. The survey was conducted following current U.S. Fish and Wildlife Service (Service) guidelines. No Indiana bats (*Myotis sodalis*) were detected, demonstrating probable absence of Indiana bats in the project area.

Currently, the Service has no known hibernacula or maternity roost records for northern long-eared bat (*Myotis septentrionalis*) in the vicinity of the project. Therefore, the 4(d) rule for the northern long-eared bat could be applied (see:

<http://www.fws.gov/midwest/angered/mammals/nleb/index.html>). Tree clearing on the project site at any time of the year is unlikely to result in adverse impacts to Indiana bats and will not result in any unauthorized incidental take of northern long-eared bats. Negative Indiana bat summer surveys are valid for five years. Therefore, **no tree clearing should occur on the site after March 31, 2024** without further coordination with this office.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the Endangered Species Act, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

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

This letter provides technical assistance only and does not serve as a completed section 7 consultation document. If project plans change, if portions of the proposed project were not evaluated, or if additional information on listed or proposed species or their critical habitat becomes available, it is our recommendation that you reinitiate coordination with this office. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at [john.kessler@dnr.state.oh.us](mailto:john.kessler@dnr.state.oh.us).

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice M. Ashfield". The signature is fluid and cursive, with a large initial "P" and "A".

Patrice M. Ashfield  
Field Office Supervisor

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