

## **PART 2 OF 3**

APPENDICES

**APPENDICES**

APPENDICES

**APPENDIX 4-1 SITING STUDY REPORT**

# Siting Study

## Lott 138 kV Transmission Line Project

*Prepared for:*



An **AEP** Company

BOUNDLESS ENERGY™

*Submitted to:*

Ohio Power Company

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## Key Terminology

Alternative Routes	Assemblage of Study Segments that form routes for analysis and comparison.
Conceptual Routes	Initial routes for the project that adhere to a series of general siting and technical guidelines.
Constraints	Specific areas that should be avoided to the extent reasonably practical during the route development and site selection process.
Distribution Line	An electric line that delivers power from a substation to households and businesses.
Encroachment	Any structure or activity within an existing right-of-way that could interfere with the safe, reliable operation of transmission facilities is called an encroachment and is prohibited under the terms of a right-of-way.
Endpoints	The project starting and ending point(s) ("Project Endpoints), which may include substations, switch stations, tap points, or other locations defined by the Company's planners and engineers.
Greenfield	New transmission line route constructed in an area or along a route where no previous transmission line route existed.
Land Use	Describes the human use of the land and activities at a given location such as agricultural, residential, industrial, mining, commercial, and recreational uses. It differs from land cover which only describes the physical characteristics (summarized from EPA.gov).
Opportunity Feature(s)	Areas or existing linear features along which the transmission line may have less disruption to area land uses and the natural and cultural environment.
Project	The proposed transmission facilities studied in the siting report.
Proposed Route	The alignment on which the applicant/Siting Team proposes to construct a transmission line. The Proposed Route (1) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (2) minimizes special design requirements and unreasonable costs; and (3) can be constructed and operated in a safe, timely, and reliable manner.
Segment Endpoint	The intersection of two or more Study Segments.
Siting Team	A multidisciplinary team of experts in transmission line routing, environmental impact assessment, impact mitigation, engineering, and construction management
Study Area	The territory in which line route alternatives can be sited to feasibly meet the Project's functional requirements and, at the same time, minimize environmental impacts and Project costs.

Study Segments	Study Segments are partial alignments that when combined form a complete route.
Study Segment Network	The assemblage of study segments between project endpoints.
Substation or Station	Substations or stations are facilities that transform bulk electric voltage down to distribution levels and/or provide protection and controls for the transmission electric grid. Typical equipment includes switches, circuit breakers, buses, and transformers.
Switch Station	A particular type of station without transformers and cannot increase or reduce the voltage.
Tap Point	The location where power is tapped from an existing transmission line to source a substation or customer.
Transmission Line	An electric line that operates at 69 kilovolts and/or above and has the purpose of moving power from a generation facility to a substation or between substations.

## ACRONYMS

AEP	American Electric Power
AEP Ohio	AEP Ohio Transmission Company, Inc.
EHV	Extra-high voltage
ESRI	Environmental Systems Research Institute
GIS	Geographic information system
GPS	Global positioning system
kV	Kilovolt
LON	Letter of Notification
msl	Mean sea level
MRLC	Multi-resolution land characteristics
NAIP	National Agricultural Imagery Project
NERC	North American Electric Reliability Corporation
NCED	National Conservation Easement Database
NHD	National Hydrography Dataset
NLCD	National Land Cover Database
NRCS	National Resources Conservation Service of the U.S. Department of Agriculture
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
ODNR	Ohio Department of Natural Resources
ODOT	Ohio Department of Transportation
OPSB	Ohio Power and Siting Board
ROW	Right-of-way
SHPO	State Historic Preservation Office
SSURGO	Soil Survey Geographic Database
T&E	Threatened and endangered (species)
UNT	Unnamed tributary
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

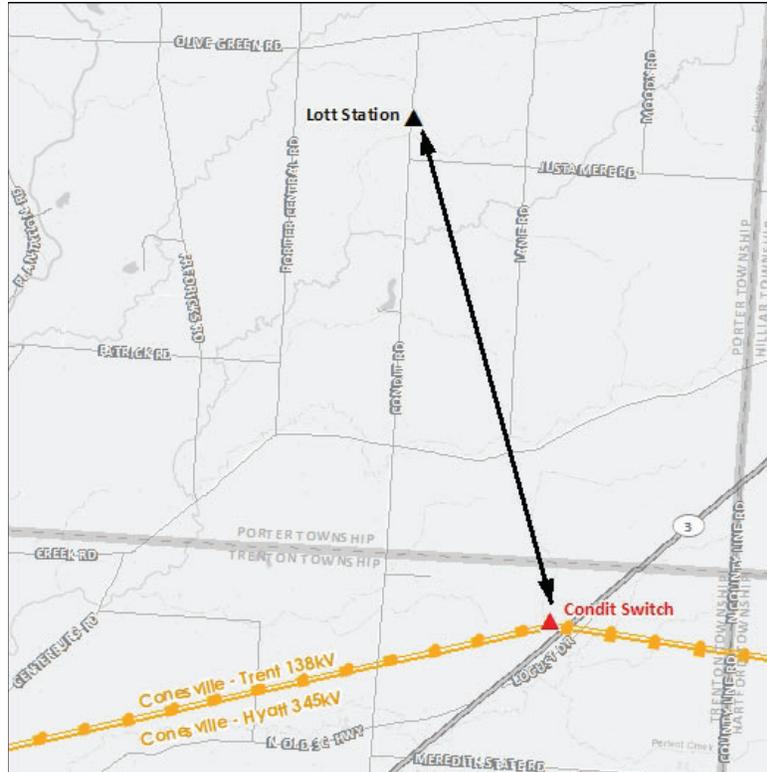
## 1.0 INTRODUCTION

### 1.1 Project Description

Ohio Power Company (the “Company”), a subsidiary of American Electric Power (AEP), has been requested by Consolidated Electric Cooperative, Inc. (the “Customer”) and Buckeye Power to provide 138 kilovolt (kV) service to the Customer’s Lott Substation in Delaware County, Ohio. A 34.5 kV transmission network out of the AEP-owned Trent and Centerburg Substations currently serves the Lott Substation. Upgrading the existing 34.5 kV distribution service to 138 kV transmission service will provide increased electric grid capacity and reliability for the Customer’s Lott Substation and its customers.

The Lott Substation is located approximately three miles north of the existing Conesville-Trent 138 kV transmission line. The existing 34.5 kV transmission line parallels Condit Road, providing a straight-line connection between the Lott Substation and the Conesville-Trent 138 kV transmission line. The existing 34.5 kV transmission line right-of-way (ROW) cannot be utilized for the new 138 kV transmission line due to encroachment issues and because the existing 34.5 kV transmission line cannot be taken out of service to build the new 138 kV transmission line. The overall project requires cutting into the Company’s Conesville-Trent 138 kV line, installing a three-way Phase-Over-Phase (POP) medium-voltage air-break (MOAB) switch (“Condit Switch”), and constructing approximately four miles of greenfield 138 kV single circuit transmission line, known as the Lott 138 kV Transmission Line Project (the “Project”), to the Customer’s Lott Substation.

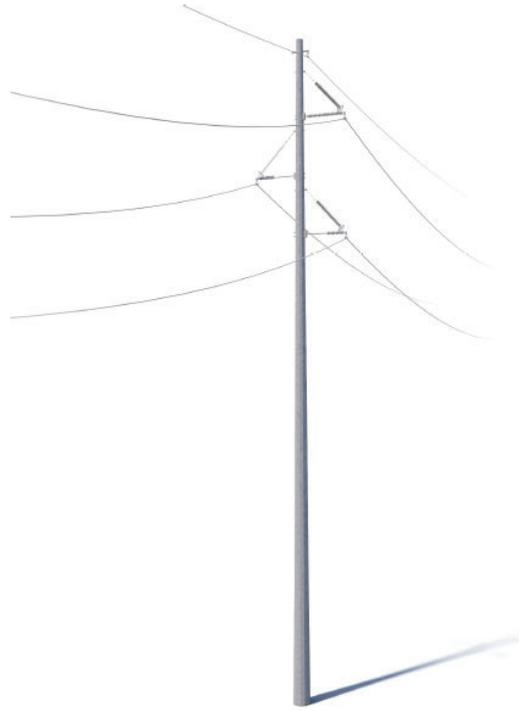
This Siting Study focuses on the greenfield 138 kV transmission line between Condit Switch and the Customer’s Lott Substation, as shown on Figure 1. The Siting Study is intended to discuss the siting process, methodology, evaluation, and selection of Alternatives Routes for the Lott 138 kV Transmission Line Project.



**Figure 1. Project Location Map**

## 1.2 Proposed Transmission Facilities Description

The Project begins at the existing Lott Substation and traverses south to the Condit Switch, located along the existing Conesville-Trent 138 kV transmission line located in Delaware County, Ohio. The Project requires a new 80-foot ROW along the proposed Lott 138 kV transmission line. The proposed Project structures are single-circuit, braced post, steel monopoles, approximately 65-90 feet in height (see Figure 2). Other structure types may be used as necessary to address unique design situation, such as heavy turn angles.



**Figure 2. Typical Transmission Structure**

### **1.3 Proposed Construction Activities Description**

Ground surveying and environmental field surveys are necessary to prepare for transmission line construction. In addition to surveys, typical transmission line construction activities include: ROW clearing, erosion and sediment controls installation, temporary access road construction, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration upon completion. These activities can create temporary inconveniences such as traffic delays and detours, potentially brief electrical outages to customers, increased heavy equipment traffic, dust, and sounds.

The Company will make every effort during the construction process to be respectful of the environment. Activities will be conducted in accordance with applicable federal, state, and/or local requirements. After construction, general maintenance activities include periodic ROW vegetation management and inspections to ensure the safe and reliable operation of the transmission line.

### **1.4 Project Timeline and Overview of Regulatory Approvals**

The Company initiated the transmission siting process in February 2020. Study Segments were developed within the Study Area between February and September 2020 with segment and route evaluation occurring from June to September 2020. Windshield surveys were completed for the

Study Segments in August of 2020. Stakeholder engagement and meetings did not take place in person due to the COVID-19 pandemic but were primarily conducted between October 2020 and August 2021. Limited additional stakeholder engagement and meetings also took place through April of 2022. A virtual open house was conducted from October 9, 2020 to October 26, 2020. Following the closure of the public comment period on October 26, 2020, the Company reviewed public comments. The Company held in person open houses on November 16, 2022 and February 1, 2023. Following the closure of the in-person open house public comment periods on November 30, 2022, the Company again reviewed public comments. The Company then completed the routing analysis and selected a Preferred Route and Alternate Route as documented within this Siting Study report. A Public Information Meeting (PIM) as part of the Ohio Power Siting Board (OPSB) Standard Application for Certificate of Environmental Compatibility and Public Need was completed on February 1, 2023. The Standard Application is anticipated to be filed in March of 2023. Pending approval from the OPSB, construction is expected to begin in January 2026 to meet a November 2026 in-service date.

## 1.5 Goal of the Siting Study

The goal of the Lott 138-kV Transmission Line Project Siting Study (the “**Siting Study**”) is to gain an understanding of the constraints and opportunity features in the Study Area, facilitate the development of study segments and route alternatives, evaluate potential impacts associated with the route alternatives, and identify a proposed route and one or more alternative routes. As this Project is being submitted to the OPSB through a Standard Application, a Preferred and Alternate Route must be identified for the Project. The Preferred (Proposed) Route is the route that (1) is most consistent with the siting guidelines (see Section 2.4); (2) reasonably minimizes adverse impacts on the natural and human environments; (3) minimizes special design requirements and unreasonable costs; and (4) can be constructed and operated in a safe, timely, and reliable manner. Section 2.0 describes the route development process to meet the goal of the Siting Study.

## 2.0 ROUTE DEVELOPMENT PROCESS

### 2.1 Siting Team

The route development process begins by assembling a multi-disciplinary team including (but not limited to) transmission line siting, engineering, environmental, right-of-way, construction management, project management, electrical system planning, and public relations (the “**Siting Team**”). The Siting Team includes both AEP employees and outside consultants. Additional expertise may be added to the team depending on specific project needs.

The Siting Team works together to develop siting criteria, identify existing constraints and opportunity features, collect and analyze environmental and design data, solicit stakeholder input, coordinate with resource and permitting agencies, develop and revise study segments and alternative routes, and analyze and report on the selection of a proposed route.

### 2.2 Route Development Process Overview

The route development process is inherently iterative with frequent modifications made throughout the Siting Study due to the identification of new constraints and the input from agencies, landowners, and other stakeholders. This results in the periodic reassessment of routes with respect to the Siting Criteria, and adjustments to the overall route network. As a result of the evolving nature of the route development process, the Siting Team uses specific vocabulary to describe the routes at different stages of development. The following provides an overview of the route development process and related vocabulary.

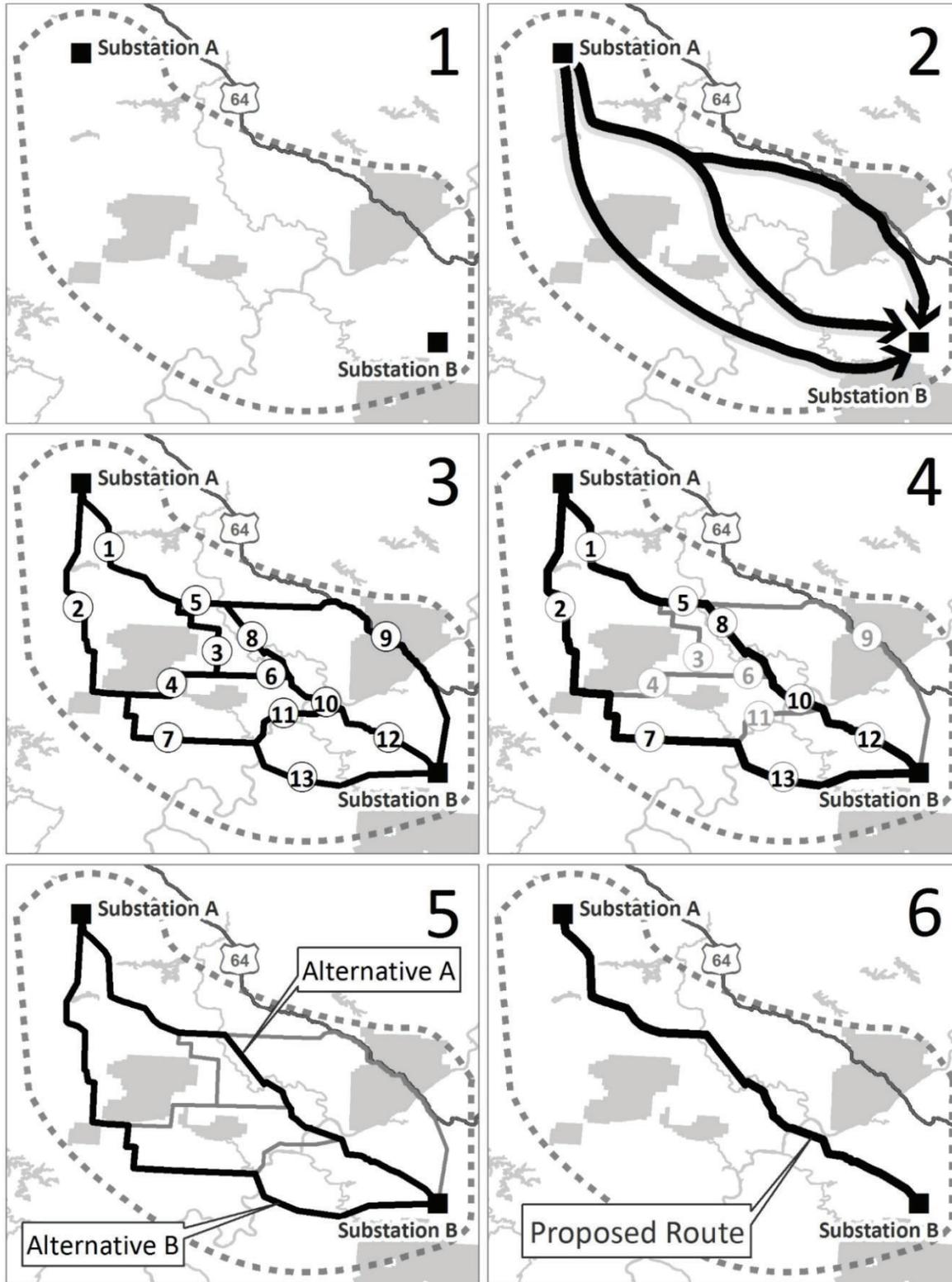
Initial route development efforts start with the identification of the **Project Endpoints**. Project Endpoints may include substations, switch stations, tap points, or other locations defined by the Company’s planners and engineers. Next, **Constraints and Opportunity Features** are identified within the **Study Area**, which encompasses the Project Endpoints and areas in between (**Figure 3, Step 1**). The initial Constraints and Opportunity Features are typically identified using readily available public data sources and supplemented with stakeholder input and field inspections.

Once the Project Endpoints, Study Area, and Constraints and Opportunity Features are identified, the **Siting Team** develops an array of **Conceptual Routes** for the Project adhering to a series of general siting and technical guidelines (**Step 2**).

Where two or more of these Conceptual Routes intersect, **Study Segments** are formed between two common points of intersection. Together, the assemblage of Study Segments is referred to as the **Study Segment Network (Step 3)**.

As the route development process progresses, the Siting Team continues to evaluate new data, such as public and stakeholder input and field inspections, and modifies, if necessary, the Study

Segments included in the network to develop a **Refined Study Segment Network (Step 4)**. Eventually, **Alternative Routes** are developed by assembling the Study Segments that reasonably meet the **Siting Guidelines (see Section 2.4)** into individual routes for analysis (**Step 5**). Alternative Routes are then assessed and compared using natural and cultural resource data, land use information, and evaluating engineering and construction concerns. Ultimately, through a quantitative and qualitative analysis and comparison of the Alternative Routes, the Siting Team identifies a **Preferred (Proposed) and Alternate Route (Step 6)**, which are the most suitable routes that meets the goal of the Siting Study (see Section 1.5).



**Figure 3. Route Development Steps**

This figure shows the route development process and does not depict routes or segments related to this Project.

## 2.3 Data Collection

The following sources of information were used to develop data for the Siting Study. Data was collected and reviewed for existing and historic land uses, natural resources, cultural resources, transportation facilities, and existing utility and linear features. A detailed table of data sources used for this study is provided in **Attachment B – GIS Data Sources**. The Siting Team collected and reviewed the data, as described in the following sections, to support the Siting Study.

### 2.3.1 Geographic Information System (GIS) Data Collection

Aerial photography is an important tool for route selection. The primary sources of aerial imagery used in the route identification, analysis, and selection effort for the Project include:

- National Agriculture Imagery Program (NAIP) 2019
- Environmental Systems Research Institute (ESRI) World Imagery (2020)

Updated information, such as the location of new residences and other constraints, was annotated to the photography by either paper maps (at the public meetings) and transferred into the GIS or digitized directly into the GIS as identified during field inspections.

The study made extensive use of information in existing GIS data sets obtained from many sources, including federal, state, and local governments. Much of this information was obtained through official agency GIS data access websites, some was provided directly by government agencies, and the Siting Team created some by digitizing information from paper-based maps, aerial photo interpretation, interviews with stakeholders, and field inspections.

GIS data sources vary with respect to their accuracy and precision. For this reason, GIS-based calculations and maps presented throughout this study should be considered reasonable approximations of the resource or geographic feature they represent and not absolute measures or counts. The data and calculations presented in this study allow for relative comparisons among project alternatives. Field reconnaissance is conducted to verify certain features (e.g., locations of residential, commercial, and industrial buildings).

### 2.3.2 Federal, State and Local Government Coordination

The Siting Team obtained information from and/or contacted various federal, state, and local agencies and/or officials to inform them of the Project and request data for the route development process. The agencies contacted are listed below. Copies of agency correspondence are included as **Attachment C**.

#### Federal Agencies

- U.S. Fish and Wildlife Service (USFWS)

## State Agencies

- Ohio Department of Natural Resources (ODNR)
- Ohio Department of Transportation (ODOT)
- Ohio Department of Agriculture (ODA)
- Ohio State Historic Preservation Office (SHPO)

## Local Agencies and/or Officials

The Siting Team coordinated with local government agencies/officials to aid the route development process. These entities included:

- Delaware County Regional Planning Commission
- Delaware County Engineer
- Delaware County Soil and Water Conservation District

### 2.3.3 Field Reconnaissance

Siting Team members conducted field inspections within the Study Area throughout the duration of the siting process. Team members examined Study Segments by automobile from public roads and other points of public access and correlated observed features to information shown on aerial photography, United States Geological Survey (USGS) 7.5-minute topographic maps, road maps, and the range of GIS sources. Prior to the field inspections, some key features such as residences, outbuildings, places of worship, cemeteries, and commercial and industrial areas are identified and mapped in GIS based on desktop review. These features are then field-verified and added to the GIS database, typically by using laptops/tablets running GIS software supported by real-time Global Positioning System (GPS) during field inspection efforts.

### 2.3.4 Public and Stakeholder Input

The consideration of public and stakeholder input is critical to the route development process. Landowners and stakeholders provide information and recommendations to aid the Siting Team in the development and refinement of Study Segments and Alternative Routes. Typically, a project-specific outreach plan is developed and can include public open houses, websites, mailings, advertising, etc. More information on how public and stakeholder input was used for the Project can be found in Section 3.6.

## 2.4 Siting Guidelines

### 2.4.1 General Guidelines

To the extent reasonable and practical, the Siting Team used the following general siting guidelines to help develop Study Segments and Alternative Routes:

- Avoid crossing or minimize conflict with designated public conservation and protected lands such as national and state forests and parks and local conservation easements.
- Avoid or minimize new crossings of large lakes, rivers and large wetland complexes, critical and protected habitats, and other unique or distinct natural resources.
- Avoid or minimize habitat fragmentation in undeveloped areas and impacts on designated areas of biodiversity concern.
- Maximize the separation distance from and/or minimize impact on dwellings and community facilities, cemeteries, schools, daycare facilities, hospitals, historic resources, and designated landmarks.
- Avoid or minimize visibility from designated scenic resources.
- Avoid or minimize conflict with existing land uses and future development with a proposed plan, schedule, and permitting process underway.
- Minimize interference with existing and future economic activities, natural gas activities, mining operations, agricultural operations, and industrial facilities.
- Consider using or paralleling existing ROWs or other linear features and infrastructure when feasible. When paralleling existing facilities, however, reliability issues and mitigation requirements must be evaluated.
- Consider paralleling property lines, land use breaks, and land cover edges.
- Consider stakeholder input.
- Avoid conflicts with designated public and military aviation facilities.
- Minimize environmental impact and construction/maintenance costs by selecting shorter, direct routes.
- Consider safety with respect to construction, maintenance, and operation of the facilities.
- Consider construction concerns such as access, road traffic control, outages, pipeline mitigations, railroad interactions, existing telecommunication line and distribution line conflicts, etc.

- Consider routes through terrain and land use where economical construction and environmental best management practices can be employed.
- Minimize environmental impact by considering routes that minimize the overall length of access roads, length on steep slopes, and waterbody crossings.
- Consider state-specific regulatory siting guidelines.

#### **2.4.2 Technical Guidelines**

Technical guidelines are driven by the physical characteristics and engineering limitations of the structures and lines themselves, design criteria necessary to meet AEP design standards, North American Electric Reliability Corporation (NERC) reliability standards, National Electric Safety Code standards, and industry best practices for construction. The technical guidelines were informed by (1) the technical expertise of engineers and other industry professionals responsible for the reliable, safe and economical construction, operation, and maintenance of electric system facilities, (2) NERC reliability standards as implemented by PJM (the regional transmission organization that monitors the electric grid in 13 states), and (3) industry best practices.

The Siting Team considered the following general technical guidelines during study segment and route development to the extent practical:

- Minimize crossing lines of higher voltage.
- Minimize the length of paralleling extra-high-voltage (EHV) transmission lines due to operational and reliability issues.
- Maintain a minimum of 100 feet of centerline-to-centerline separation when paralleling 138 kV transmission lines.
- When paralleling existing transmission lines, verify there are no reliability issues by locating lines adjacent to each other.
- Minimize structure angles greater than 65 degrees.
- Locate proposed lines near future load growth areas.
- Minimize distribution underbuild or co-location on transmission structures if possible.
- All structures must be accessible for construction and maintenance.
- Proposed line interconnection with existing transmission line preferred to be mid span.
- Interconnection with existing line preferred to be near existing roadway to reduce access road needs for the Condit Switch.

## 3.0 ALTERNATIVE ROUTE IDENTIFICATION

### 3.1 Project Endpoints

The Project Endpoints include the Customer's Lott Substation to the North and four potential switch alternative locations along the Conesville-Trent 138 kV transmission line to the South. The location of the proposed switch was determined during the Project's siting process and included the following criteria:

- Proximity to a public road for access.
- Avoid locating a switch within an agricultural easement or other areas with restrictions that are not compatible with construction of a switch. Unlike transmission line poles, construction of a switch station requires a permanent conversion of a larger area of land to a fenced and graveled area measuring 75 feet by 75 feet, and also requires construction of a permanent access road to it that is 15 feet in width.
- Minimize line length.

The Siting Team evaluated four potential locations (see **Map 2 and Map 3, Attachment A**) and selected a proposed switch location based on the above criteria. The Siting Team also reviewed the constructability of the alternative switch locations and incorporated the results into the identification of a Proposed Route. The alternative switch locations were identified to reduce potential route length while locating the station next to a public road for ease of access. The differences in the four alternative switch locations were not significant, other than one of the alternative switch locations (Condit Switch Alternative A) would require crossing State Highway 3.

ODOT representatives were contacted regarding the feasibility of constructing a permanent drive off State Highway 3 to obtain access to the proposed Condit Switch Alternative B location. ODOT responded that they saw no issue with a permanent drive off State Highway 3. Representatives noted that the intersection at Condit Road and State Highway 3 was recently upgraded and that the only planned project within the Study Area is the resurfacing of State Highway 3, which has no tentative date. ODOT requested that a minimum setback of 50 feet is taken from the stream/bridge crossing on State Highway 3 near the proposed Condit Switch Alternative B location in the event that the bridge and/or culverts require replacement at some future date.

### 3.2 Study Area Description

The Study Area is the territory in which line route alternatives can be sited to feasibly meet the Project's functional requirements and reasonably minimizes environmental impacts and Project costs. The boundaries of the Study Area were determined by the geographic area encompassing

Lott Substation and the selected location of the Condit Switch, which are the endpoints for the Project. The Study Area was intended to encompass all practical Conceptual Routes between these endpoints. Given these considerations, the Siting Team identified a Study Area encompassing approximately 3,690 acres (5.8 square miles) in Delaware County, Ohio (see **Map 1, Attachment A**). The Study Area is generally bounded by Olive Green Road and Lott Substation to the north, Moody Road to the east, the Conesville-Trent 138 kV transmission line to the south, and Porter Central Road to the west.

### 3.3 Constraints and Opportunity Features

The Siting Team identified and mapped siting Constraints and Opportunity Features within the Study Area as described below

#### Constraints

Constraints are specific areas that should be avoided to the extent practical during the route development process. Using readily available public data sources, the Siting Team initially identified large constraints during the beginning of the route development process including, but not limited to, the following:

- Populated areas, including towns, small villages, urban areas, and other high concentrations of residential, commercial and industrial development areas;
- National Register of Historic Places (listed and eligible);
- Recreational areas such as parks and large recreational reservoirs;
- Streams, wetlands, flood zones or unique natural resource features, and critical habitat areas;
- Designated federal or state forests, parks, state game lands, and other natural and conservation areas; and
- Large future land use plans

The Study Area is scattered with rural residences, wetlands, streams, forested areas, horse farms, and ODA agricultural easements. The Study Area does not contain municipal areas, commercial or industrial developments, federally protected land, locally protected land, or state protected land other than the ODA agricultural easements.

As the Siting Team developed Study Segments, smaller site-specific constraints were identified (using readily available public data sources, stakeholder input, and field inspections). Through the iterative process of route development (described in Section 2.0), the Study Segments were

adjusted to avoid small constraints where feasible. Within the Study Area, these small constraints included the following:

- Individual residences (houses and mobile homes)
- Commercial and industrial buildings
- Outbuildings and barns
- Cemeteries
- Churches
- Designated historic resources and landmarks
- Small wetlands
- Site-specific future land use plans
- Other tall infrastructure, including a water tower

### Opportunity Features

Opportunity Features are typically existing corridors, areas, or edges where a transmission line would be compatible with the current land use, or its presence would be reduced by an existing linear feature. Opportunity Features typically considered include other linear infrastructure and utility corridors, rail lines, and roads, but may also include land cover edges, unused portions of industrial or commercial areas, or parcel boundaries. Siting opportunities identified within the Study Area are listed below and presented on the Study Area map (**Map 1, Attachment A**).

- The Conesville-Trent 138 kV transmission line and the Conesville-Hyatt 345 kV transmission line are the only high voltage transmission lines located within the Study Area. The ROWs of these transmission lines are adjacent to each other and parallel the southern boundary of the Study Area.
- State Highway 3 crosses the southeast corner of the Study Area.
- Local roads that offer a siting opportunity include Porter Central Road, Condit Road, Lane Road, Justamere Road, and Centerburg Road.
- Parcel lines.

Public roads provided attractive siting locations when not constrained by the proximity of other features such as rural residences. The Conesville-Trent 138 kV transmission line provided some opportunity to parallel when connecting to potential proposed switch station locations. Parcel lines provided opportunities to parallel habitat edges and property boundaries.

### 3.4 Routing Concepts

Initially, the Siting Team considered upgrading the existing 34.5 kV transmission line along Condit Road, which would connect the Lott Substation with the Conesville-Trent 138 kV transmission line in a direct north/south line. However, both sides of Condit Road presented challenges including a cemetery, church, and several residential structures between Justamere Road and Centerburg Road, when considered rebuilding within the existing easement area. The Siting Team determined that rebuilding the 34.5 kV transmission line along Condit Road was not a viable option due to these constraints. Also, the 34.5 kV transmission line needs to remain in service until the new 138 kV transmission line is operational, as it is the only source of power supplying the Lott Substation.

### 3.5 Study Segment Development

The Siting Team developed a series of Study Segments based on the route development process and criteria described in Section 2.0. **Map 2, Attachment A** shows the resulting network of Study Segments used to collect public and stakeholder input. The Study Segments are evaluated and refined following the public and stakeholder input as described in Section 3.7.

### 3.6 Public and Stakeholder Input

#### 3.6.1 Public Communications and Open House

Due to impacts from the COVID-19 pandemic, initial public involvement was gathered via a virtual open house, which included a project website with interactive tutorials providing information on the engineering, siting, construction, and ROW requirements for the Project in October 2020. The virtual open house also included options for the submission of landowner feedback, providing the Siting Team with detailed information along the proposed Study Segments. In addition, two in-person open houses/Public Informational Meetings (PIMs) were also held in November 2022 and February 2023 and landowner comments regarding the Preferred and Alternate Routes were collected.

#### 3.6.2 Project Website, Virtual Open House, and Open Houses

A virtual open house website went live on October 9, 2020 and presented Project information that was used to solicit comments and feedback from the public (<https://www.aeptransmission.com/ohio/Lott/>). The website contained Project updates, a Project map, timeline, typical structure details, methods for contacting the Company, and a link to the interactive virtual open house. There were 75 unique page views of the virtual open house website during the comment period. The Company encouraged the public to provide comments by October 26, 2020. However, the website was still accessible and additional comments were provided after this date. A summary of the comments received in response to the virtual open house is provided in Section

3.6.4. As stated, in person open houses/PIMs were also later held on November 16, 2022, and February 1, 2023, with the comment periods being open until November 30, 2022, and February 10, 2023, respectively. The in person open houses/PIMs provided similar information as the virtual open house, as well as mapping of the Preferred and Alternate Routes (these were only provided at the February 2023 open house/PIM), environmental and other constraints mapping, a Project fact sheet, Project approval timelines, construction timelines, details on the proposed transmission line structures, and other information regarding the transmission line construction process. Thirty-two people attended the November 16, 2022 open house/PIM and seven people attended the February 1, 2023 open house/PIM. A summary of the comments received in response to the in person open houses/PIMs is provided in Section 3.6.4.

### 3.6.3 Other Stakeholder Input

Based on virtual open house comments regarding the presence of ODA agricultural easements in the Study Area, the Delaware County Soil and Water Conservation District and Delaware County Regional Planning Commission were contacted to determine the location of these easements. In addition, two meetings with the ODA were held in 2022, to identify the terms and locations of the ODA agricultural easements in the Project area. The ODA provided maps of the locations of parcels with known and proposed agricultural easements within the Study Area. The Delaware County Soil and Water Conservation District and Delaware County Regional Planning Commission provided a conceptual overview plan for a proposed thoroughfare connecting Porter Central Road and Condit Road. The locations of parcels containing known or pending agricultural easements within the Study Area are shown on **Map 5, Attachment A**. The Delaware County Regional Planning Commission was not aware of future development plans, notable underground utilities, or other protected areas. The Delaware County Regional Planning Commission did provide the Company with maps of parcels containing current and pending ODA agricultural easements and they provided information about a potential thoroughfare plan within the Study Area that may include a road connecting Porter Central Road with Condit Road north of Justamere Road in the northwest portion of the Study Area.

ODOT representatives were contacted regarding pending transportation projects planned within the Study Area. ODOT representatives noted that the intersection at Condit Road and State Highway 3 was recently upgraded and that the only planned project within the Study Area is the resurfacing of State Highway 3, which has no tentative date.

### 3.6.4 Consideration of Public and Stakeholder Input

#### Summary of October 2020 Virtual Open House Comments

Twenty-nine comments on the Project were received on the virtual open house website. Four additional comments on the Project were received after the completion of the virtual open

house. These comments were in regard to the study segment network and associated alternative routes developed for the Project. The majority of the comments received from the public and stakeholders included concerns over the impacts to property values, impacts to current and future property construction or use, visual impacts to residences and natural resources, as well as forest clearing and wetlands impacts. Several landowners commented that they had plans to build houses, businesses, or other structures in the locations where potential route segments were located. Three comments also provided information about the potential locations of cemeteries, historical areas, and possible wetlands with the Study Area. Two commenters also had concerns over the potential health impacts to members of the community and their individual households with the stress of construction. One landowner on Centerburg Road west of Condit Road has a working horse farm/ranch which is looking to expand to the east, potentially impacting Study Segments 18 and 19. Other comments also provided information about potential locations of cemeteries, agricultural easements, and Conservation Reserve Program (CRP) easements.

#### Summary of In Person Open House/PIM Comments

Written comments from 14 landowners were received in response to the November 16, 2022 open house/PIM. Of these comments, nine were opposed to the Alternate Route, four were in support of the Preferred Route, one was in support of the Alternate Route, three were opposed to the Preferred Route, and two comments suggested no preference over either route. One commenter stated that they have plans to build a pool, pool house, and access driveway in the area near where the Alternate Route would cross Centerburg Road just west of Lane Road. In response to this comment, a portion of the Alternate Route centerline was adjusted and shifted west between the November 16, 2022 open house and the February 1, 2023 open house. In general, most landowners stated a preference for the eastern route (Preferred Route) instead of the western route (Alternate Route), primarily due to their concerns with visual impacts, impacts to forested habitats and wildlife, and the increased number of landowners that would be affected along the Alternate Route as opposed to the Preferred Route.

A total of three written comments were received in response to the February 1, 2023 open house/PIM. One comment stressed concern for impacts to forested areas and natural resources along the Alternate Route and emphasized a preference for the Preferred Route because it causes the least amount of possible disturbance to people and the environment. A second comment discussed concern for visual aesthetics of the transmission line on both routes, while the third comment discussed future plans of installing pasture fence and raising cattle and chickens on their property in the area that would fall under the Alternate Route ROW.

Upon reviewing the comments, the Siting Team incorporated the information, where applicable, when reviewing, revising, and comparing Study Segments as described in Section 3.7.

### 3.7 Study Segment Evaluation and Refinement

Using public and stakeholder input, updated mapping, and additional field inspections, the Study Segments were evaluated and refined in order to avoid or minimize impacts to resources in the Study Area. As a result, some Study Segments were removed, added, and modified as described below.

Of the initial 26 Study Segments used in the public outreach efforts associated with the virtual open house, five were removed from further consideration. Landowner comments indicated that a cemetery (Robinson Cemetery) is located approximately 0.25 miles south of Justamere Road and 0.25 miles east of Condit Road. The precise location of the cemetery was unknown but the approximate location of this cemetery is shown on **Map 5, Attachment A**. Additionally, the Company's cultural resources consultant documented the approximate location of this cemetery in their initial archaeological survey report prepared for the Project. Therefore, the four segments (7, 9, 11, and 12) located in the vicinity of the cemetery were removed. An additional segment (2b) connecting Segment 4 to the proposed Condit Switch Alternative C location was deemed unnecessary, because Segment 4 could be connected to the proposed Condit Switch Alternative B location in a shorter distance. In addition, the potential Condit Switch Alternative D was eliminated because only one alternative switch station location was needed in the vicinity of Condit Road. Additionally, the location of Segment 17 was adjusted to end at the Condit Switch Alternative C location after the elimination of Condit Switch Alternative D. Eliminated segments are shown on **Map 3, Attachment A**.

### 3.8 Alternative Routes

The Siting Team met frequently throughout the route development process, continually reviewing, modifying, and eliminating Study Segments based on field inspections, engineering requirements, and stakeholder input. At the end of the process, the Siting Team compiled the Study Segments into 12 Alternative Routes going to three different switch locations for analysis and comparison. The Alternative Routes are described in the following sections and are shown in more detail on **Map 3, Attachment A**.

#### 3.8.1 Alternative Route A

Alternative Route A uses Study Segments 1, 3, 13, 14, 15, and 16. It begins at the Condit Switch Alternative A location, crosses State Highway 3, and proceeds west along the north side of the existing Conesville-Trent 138 kV transmission line for 0.1 mile, before making a turn to the north for 2.5 miles and crossing Centerburg Road. Alternative Route A then crosses Justamere Road where it turns west for 0.9 mile and crosses Lane Road. It then turns north along Condit Road for approximately 0.2 mile to the existing Lott Substation.

### **3.8.2 Alternative Route B**

Alternative Route B uses Study Segments 3, 13, 14, 15, and 16. It begins at the Condit Switch Alternative B location and proceeds north for 2.5 miles and crosses Centerburg Road. Alternative Route B then crosses Justamere Road where it turns west for 0.9 mile and crosses Lane Road. It then turns north along Condit Road for approximately 0.2 mile to the existing Lott Substation.

### **3.8.3 Alternative Route C**

Alternative Route C uses Study Segments 2, 4, 6, 8, 10, 13, 14, 15, and 16. It begins at the Condit Switch Alternative B location and proceeds west along the existing Conesville-Trent 138 kV transmission line for 0.4 mile, before making a turn north for 1 mile. Alternative Route C crosses Centerburg Road and then turns northwest for 0.3 mile before turning back to the north for 1.3 miles, crossing Justamere Road and turning west for 0.3 mile. The route then turns north along Condit Road for approximately 0.2 mile to the existing Lott Substation.

### **3.8.4 Alternative Route D**

Alternative Route D uses Study Segments 5, 5b, 6, 8, 10, 13, 14, 15, and 16. It begins at the Condit Switch Alternative C location and proceeds east along the existing Conesville-Trent 138 kV transmission line for 0.4 mile, before making a turn north for 2.3 miles. Alternative Route D crosses Centerburg Road and then Justamere Road before turning west for 0.3 mile. The route then turns north along Condit Road for approximately 0.2 mile to the existing Lott Substation.

### **3.8.5 Alternative Route E**

Alternative Route E uses Study Segments 17, 18, 22, 23, and 16. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north for 2.4 miles, crossing Centerburg Road before making a turn to the northeast for 0.4 mile and crossing Condit Road again. Alternative Route E then turns to the northeast for 0.4 mile crossing Condit Road again before turning north for 0.1 mile to enter the existing Lott Substation.

### **3.8.6 Alternative Route F**

Alternative Route F uses Study Segments 17, 19, 20, 22, 23, and 16. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north for 1.6 miles, crossing Centerburg Road before making a turn to the east for 0.2 mile and then to the north for 0.8 mile. Alternative Route F then turns to the northeast for 0.4 mile crossing Condit Road again before turning north for 0.1 mile to enter the existing Lott Substation.

### **3.8.7 Alternative Route G**

Alternative Route G uses Study Segments 17, 18, 20, 21, 23, and 16. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then

turns north for 1.6 miles, crossing Centerburg Road before turning to the west for 0.3 mile and then to the north paralleling Porter Central Road for 0.8 mile. Alternative Route G then turns to the east for 0.3 mile before turning northeast for 0.4 mile crossing Condit Road again before turning north for 0.1 mile to enter the existing Lott Substation.

### **3.8.8 Alternative Route H**

Alternative Route H uses Study Segments 17, 19, 21, 23, and 16. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north for 1.6 miles, crossing Centerburg Road before turning to the west for 0.1 mile and then to the north paralleling Porter Central Road for 0.8 mile. Alternative Route H then turns to the east for 0.3 mile before turning northeast for 0.4 mile crossing Condit Road again before turning north for 0.1 mile to enter the existing Lott Substation.

### **3.8.9 Alternative Route I**

Alternative Route I uses Study Segments 17, 18, 22, and 24. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north for 2.7 miles, crossing Centerburg Road before making a turn to the east for 0.3 mile crossing Condit Road again. Alternative Route I then turns south on Condit Road for 0.1 mile to enter the existing Lott Substation.

### **3.8.10 Alternative Route J**

Alternative Route J uses Study Segments 17, 19, 20, 22, and 24. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north for 1.6 miles, crossing Centerburg Road before making a turn to the east for 0.2 mile and then to the north for 1.1 miles. Alternative Route J then turns to the east for 0.3 mile crossing Condit Road again before turning to the south on Condit Road for 0.1 mile to enter the existing Lott Substation.

### **3.8.11 Alternative Route K**

Alternative Route K uses Study Segments 17, 18, 20, 21, and 24. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north for 1.6 miles, crossing Centerburg Road before turning west for 0.3 mile and then to the north paralleling Porter Central Road for 0.8 mile. Alternative Route K then turns to the east for 0.3 mile and then north for 0.3 mile. It then turns east for 0.3 mile crossing Condit Road again before turning to the south on Condit Road for 0.1 mile to enter the existing Lott Substation.

### 3.8.12 Alternative Route L

Alternative Route L uses Study Segments 17, 19, 21, and 24. It begins at the Condit Switch Alternative C location and proceeds northwest for 0.4 mile, crossing Condit Road. The route then turns north, crossing Centerburg Road, for 1.6 miles before turning to the west for 0.1 mile and then to the north paralleling Porter Central Road for 0.8 mile. Alternative Route L then turns to the east for 0.3 mile and then north for 0.3 mile. It then turns east for 0.3 mile crossing Condit Road again before turning to the south on Condit Road for 0.1 mile to enter the existing Lott Substation.

## 4.0 ALTERNATIVE ROUTE COMPARISON

The Alternative Routes comparison provides a quantitative and qualitative analysis of potential impacts to local communities, the environment and cultural resources, as well as engineering and constructability concerns. The Alternative Routes were reviewed in detail and compared using a combination of information collected in the field, GIS data sources, public input, supporting documents, and the collective knowledge and experience of the Siting Team.

### 4.1 Natural Environment

The natural environment includes water, soil, sensitive species, and wildlife habitat. Potential impacts are based on publicly available maps and data, as well as coordination with federal, state and local agencies. The Siting Study goal is to avoid or minimize impacts on the natural environment to extent practicable during construction and operation and maintenance of the transmission facilities. A comparison of the natural environment considerations for the Alternative Routes is presented at the end of this section in **Table 1**.

#### 4.1.1 Geological, Soil, and Water

##### Resource Characteristics

Topography within the Study Area was generally flat to gently rolling, with elevations ranging from approximately 1,069 feet above mean sea level (msl) in the southwestern portion along a riparian corridor of an unnamed tributary (UNT) to Culver Creek, to approximately 1,110 feet above msl in the central portion, and up to 1,130 feet above msl in the eastern portion. According to the Natural Resources Conservation Service (NRCS) soil survey data, most soils within the Study Area were very poorly drained to moderately well drained with slopes ranging from zero to 25 percent and were categorized as prime farmland or prime farmland if drained. National Hydrography Dataset (NHD) and National Wetlands Inventory (NWI) data were reviewed for the Study Area. Streams within the Study Area include Culver Creek, six UNTs to Culver Creek, two UNTs to Perfect Creek, Sugar Creek, and an UNT to Sugar Creek. Mapped NWI wetlands are scattered throughout the Study Area and include palustrine unconsolidated bottom (PUB), palustrine emergent (PEM), palustrine forested/scrub-shrub (PFO/PSS), and riverine wetlands. Mapped Federal Emergency Management Agency (FEMA) 100-year floodplains are located along portions of Culver Creek and two of its UNTs, as well as along Sugar Creek in the northwestern portion of the Study Area. Constructability and geotechnical issues are discussed in Section 4.3. NRCS soil survey data within the Study Area is provided on **Map 6** and water resources desktop data is provided on **Map 4, Attachment A**.

## Alternative Route Comparison

Alternative Routes were primarily distinguished by impacts to stream crossings, wooded riparian buffer crossings, NWI-mapped PEM/PSS wetland crossings, and FEMA 100-year floodplain crossings. Although Alternative Routes C and E-L cross the fewest streams (five), routes E-L have the greatest impact to wooded riparian buffers (four crossings). Alternative Routes A through D would not cross any NWI-mapped PEM/PSS wetlands, while Alternative Routes E-L would all cross approximately 0.5 acres of NWI-mapped PEM/PSS wetlands. Alternative Routes E-L cross a FEMA 100-year floodplain at two locations, Culver Creek and an UNT to Culver Creek, while Alternative Routes A, B, C, and D only cross the FEMA 100-year floodplain at one location along an UNT to Culver Creek. Potential permanent impacts to the floodplain would be limited to structure footprints. Overall, Alternative Route C had the fewest stream crossings, crossed the fewest wooded riparian buffers, and had the least amount of floodplains within the ROW.

### 4.1.2 Wildlife Habitat and Sensitive Species

#### Resource Characteristics

Wildlife and habitat constraints within the Study Area consisted of ten NHD-mapped streams, NWI-mapped wetland complexes, and mixed deciduous forest areas, as illustrated on **Map 4 and Map 5, Attachment A**. Technical assistance/environmental review letters were sent to both the ODNR and the USFWS for review of the Project and surrounding natural resources. The ODNR and USFWS responses are included within **Attachment C**. Details regarding State-listed and federally listed threatened and endangered species (T&E species) and their habitats of concern within the Study Area are summarized in **Attachment D**. No critical habitat for federally listed T&E species was identified within the Study Area and no known occurrences of T&E species are known within the Study Area, according to the ODNR and USFWS responses.

#### Alternative Route Comparison

All **Alternative Routes** require tree removal in mixed early successional/second growth deciduous forest, which contains potential summer roosting and foraging habitat for federally listed and State-listed T&E bat species. Alternatives Route A,B, C, and G have the least amount of tree clearing required in the ROW (approximately 6.6-7.5 acres) because these routes primarily cross active agricultural row crop fields. Slightly more forest clearing would be required for Alternative Routes D and K (8.2 and 8.0 acres), with Alternative Routes F and J having the most required tree clearing (11.6 and 12.1 acres, respectively) and greatest potential to impact T&E bat foraging and roosting habitat. The Siting Team considered that although tree removal would be required, direct impacts to streams can be avoided by spanning each crossing. No T&E bird or aquatic species or their preferred habitat are known to occur within the Study Area (see

**Attachment D).** Therefore, no direct impacts to T&E bird or aquatic species are anticipated. Overall, the Siting Team considered the eastern routes (Alternative Routes A-D) more desirable because they would require less tree clearing (and thus have fewer potential impacts to habitat for T&E bat species) than the western routes (Alternative Routes E-L).

**Table 1. Natural Environment Evaluation Criteria**

Alternative Route	Unit	A	B	C	D	E	F	G	H	I	J	K	L
<b>General</b>													
Length	miles	3.7	3.5	3.5	3.6	3.4	3.5	3.9	3.8	3.6	3.7	4.1	4.0
<b>Water Resources</b>													
Total streams crossed	count	7	7	5	6	5	5	5	5	5	5	5	5
Wooded riparian buffers crossed	count	3	3	2	3	4	4	4	4	4	4	4	4
Forested wetlands in the ROW (NWI)	acres	0	0.03	0	0	0.1	0	0.1	0	0.1	0.002	0.1	0.002
PEM/PSS wetlands in the ROW (NWI)	acres	0	0	0	0	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
FEMA-designated floodplain crossed by ROW	acres	0.3	0.4	0.2	0.4	1.5	1.6	1.1	1.1	1.5	1.6	1.1	1.1
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Springs within 250 feet of centerline; High quality/exceptional/special protection stream crossings; Waterbody crossings. ROW acreage calculations were based on assumed maximum ROW width of 80 feet.</i>													
<b>Geological and Soil Resources</b>													
Prime and unique farmland soil in the ROW <sup>1</sup>	acres	3.8	3.6	2.5	2.8	5.4	4.5	5.0	3.3	5.1	4.5	5.0	3.3
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: farmland of statewide importance<sup>2</sup>; Karst topography; Known caves or mines crossed. ROW acreage calculations were based on assumed maximum ROW width of 80 feet.</i>													
<b>Wildlife and Habitat</b>													
Tree clearing required in the ROW (digitized based on aerial photography)	acres	7.2	7.5	6.6	8.2	9.9	11.6	7.5	9.2	10.4	12.1	8.0	9.7
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Sensitive habitats crossed; T&amp;E species known locations within ROW; Tree clearing parallel to existing linear infrastructure; Special natural areas crossed by ROW or within 2500 feet of ROW. ROW acreage calculations were based on assumed maximum ROW width of 80 feet.</i>													

<sup>1</sup> Prime farmland is land that has the best combination of physical and chemical characteristics for producing crops

<sup>2</sup> Soils that do not meet the prime farmland category but are still recognized for their productivity by states and may qualify as soils of statewide importance

## 4.2 Human Environment

The human environment is the human use of the land and activities at a given location such as agricultural, forestry, residential, industrial, mining, commercial, institutional, scenic assets, and recreational uses. The Siting Study goal is to avoid or minimize conflicts with existing and proposed land uses that are not compatible with a new transmission line. A comparison of the human environment considerations for the Alternative Routes is presented at the end of this section in **Table 2**. Land use within the Study Area is shown on **Map 5, Attachment A**.

### 4.2.1 Existing and Proposed Developed Land Use

#### Resource Characteristics

According to the National Land Cover Database (NLCD), the Study Area is largely undeveloped and the existing land uses consist of cropland, hayfield, pasture, deciduous, evergreen, or mixed forest, developed land, emergent herbaceous wetland, open water, shrub/scrub, and woody wetlands (**see Map 5, Attachment A**). Rural single-family dwellings are located along all roads within the Study Area. One place of worship and an adjacent cemetery was located along Condit Road, north of the intersection of Condit Road and Centerburg Road. According to the Delaware County Regional Planning Commission's website, parcels crossed by the Alternative Routes are zoned as a farm and rural residential district (Delaware County Ohio 2021). The Company contacted the Delaware County Regional Planning Commission via email on March 9, 2021 to request any information the County may have for the Study Area, including future development plans, upcoming transportation projects, notable underground utilities, or other protected areas you may be aware of. The Delaware County Regional Planning Commission responded via email on March 15, 2021 and stated that they are unaware of any future development plans. They did send information to the Company regarding the locations of parcels with current and pending ODA agricultural easements, as well as information about a potential thoroughfare plan within the Study Area that may include a road connecting Porter Central Road with Condit Road north of Justamere Road in the northwest portion of the Study Area. The Company also contacted ODOT Region 6 via telephone in March of 2021. ODOT stated that the intersection at Condit Road and State Route 3 was recently upgraded, but no other projects are planned within the Study Area for the near or distant future, other than resurfacing State Route 3 which may occur in the upcoming years.

#### Alternative Route Comparison

All Alternative Routes avoided direct impacts to existing rural single-family dwellings and outbuildings (including barns, sheds, garages, and silos) within the proposed ROWs. Alternative Routes A and B cross the least number of parcels (16 and 17, respectively) and cross the least number of individual landowners (10 and 9, respectively). Alternative Routes I, J, K, and L are

each within 100 feet of one single-family dwelling, while Alternative Routes A and B are both within 250 feet of one business/commercial building, but are not in close proximity to residential structures. Alternative Routes H and L have the most residences near the centerline; however, there are no businesses within 500 feet of the centerline of those routes. The Siting Team identified the eastern routes (Alternative Routes A-D) as having fewer potential impacts on residential structures and fewer impacts to potential residential developments than the western routes (Alternative Routes E-L).

#### 4.2.2 Agricultural and Forestry Resources

##### Resource Characteristics

Cropland, hayfield, pasture, and forested areas were the main land use types within the Study Area. As previously stated, an active horse farm/ranch is located along Centerburg Road to the west of Condit Road and has expansion plans to the east. NRCS soil survey data and the NLCD were analyzed for agricultural resources within the Study Area. Portions of the Study Area were categorized as prime and unique farmland soil, herbaceous/pasture, and cropland. Forested areas within the Study Area were early successional and second growth mixed deciduous forest.

No federal or state forest lands were located within the Study Area. However, twelve parcels of land enrolled into an agricultural easement program with the ODA were first identified through landowner comments. The locations of parcels with active and pending agricultural easements were confirmed through the Delaware Soil and Water Conservation District and Delaware County Planning Commission and are shown on **Map 5, Attachment A**.

The Agricultural Easement Donation Program is a tool for landowners to protect their farm's soils, natural resource features, and scenic open space. It provides landowners the opportunity to donate the easement rights on viable farmland to the ODA. The ODA assures the land remains in agricultural use. All easement transactions are recorded on the property deed and transfer with the land to successive owners. Farmland with agricultural easements can be sold or passed along as a gift to others at any time; however, the restriction prohibiting certain non-agricultural development stays with the land. Agricultural land within transmission line ROW can still be utilized as farmland.

##### Alternative Comparison

All Alternative Routes crossed portions of agricultural resources, see **Map 5 in Attachment A**. Permanent impacts to agricultural land will be limited to structure footprints. Alternative Routes E and I cross the most acreage designated as prime and unique farmland soil (5.4 and 5.1 acres) as compared to the other Alternative Routes. All Alternative Routes cross over agricultural easements. However, Alternative Routes A-C cross the largest amount of agricultural easements

(9.7-10.5 acres). Alternative Route C crosses the most amount of acreage designated as cropland (22.8 acres) but also crosses the smallest amount of prime and unique farmland soil (2.5 acres) and has lower impacts to pasture/rangeland (2.1 acres) than all but three of the alternatives. Alternative Route F has one of the lowest impacts for pasture/rangeland crossings (2.1 acres), cropland crossings (18.5), and agricultural easement crossings (4.3). All Alternative Routes west of Condit Road (Alternative Routes E-L) would cross land proposed for expansion of the active horse farm/ranch on Centerburg Road, while none of the Alternative Routes east of Condit Road (Alternative Routes A-D) would cross those lands.

#### **4.2.3 Recreation and Conservation Lands**

No recreation and conservation lands were identified within the Study Area. Therefore, no impacts to those lands are anticipated.

#### **4.2.4 Historic and Archaeological Resources**

##### **Resource Characteristics**

The Company's consultant completed a cultural resources site file search for the Study Area in May of 2020 and no National Register of Historic Places (NRHP) listed sites or NRHP eligible sites were identified within the Study Area. A historic bridge was identified along Lane Road. However, the bridge has not been listed on the NRHP and has since been demolished and replaced with a modern bridge. Two cemeteries were also located within the Study Area, including Mount Pleasant Cemetery and Robinson Cemetery. A cursory field inspection revealed that the Robinson Cemetery appears to have been destroyed or, at minimum, headstones within it have been removed.

##### **Alternative Route Comparison**

There were no major historic or archaeological resource differences between the Alternative Routes. The historic bridge and cemeteries were not located within or adjacent to Alternative Routes as shown on **Map 5, Attachment A**.

**Table 2. Human Environment Evaluation Criteria**

Alternative Route	Unit	A	B	C	D	E	F	G	H	I	J	K	L
<b>General</b>													
Length	miles	3.7	3.5	3.5	3.6	3.4	3.5	3.9	3.8	3.6	3.7	4.1	4.0
Number of parcels <sup>3</sup> crossed	count	16	17	24	22	23	26	23	26	25	28	25	28
Landowners within ROW	count	10	9	13	13	19	22	19	22	20	23	20	23
<b>Municipalities, Counties, and Townships Crossed</b>													
Townships (Porter and Trenton)	miles	2	2	2	2	2	2	2	2	2	2	2	2
<b>Residential</b>													
Residences/single-family dwellings within 100 feet of centerline	count	0	0	0	0	0	0	0	0	1	1	1	1
Residences/single-family dwellings within 250 feet of centerline	count	3	4	2	2	2	1	4	3	4	3	6	5
Residences/single-family dwellings within 500 feet of centerline	count	14	14	9	11	7	9	14	15	8	10	14	15
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Barns, outbuildings, sheds, garages, and silos in the ROW; residences/single-family dwellings within ROW; Multifamily dwellings<sup>4</sup> in ROW or within 500 feet of centerline.</i>													
<b>Commercial/Industrial</b>													
Businesses/commercial buildings within 250 feet of the centerline	count	1	1	0	0	0	0	0	0	0	0	0	0
Businesses/commercial buildings within 500 feet of the centerline	count	1	1	0	0	0	0	0	0	0	0	0	0
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Businesses/commercial buildings within ROW; Mining areas; Quarries.</i>													
<b>Agricultural</b>													
Pasture/rangeland crossed in ROW (based on NLCD data)	acres	3.4	3.3	2.1	1.9	3.1	2.1	5.3	3.4	3.1	2.1	5.3	3.4
Cropland crossed in ROW (based on NLCD data)	acres	21.9	22.6	22.8	21.8	18.1	18.5	20.4	18.6	19.9	20.3	22.2	20.4
Agricultural easements crossed within ROW	acres	9.7	9.8	10.5	4.2	4.3	4.3	7.4	7.4	4.3	4.3	7.4	7.4
Agricultural easements crossed within ROW	feet	5,293	5,200	5,727	2,280	2,160	2,160	4,047	4,047	2,160	2,160	4,047	4,047
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Tree farms or orchards crossed in ROW. ROW acreage calculations were based on assumed maximum ROW width of 80 feet.</i>													
<b>Community/Recreational Facilities</b>													

<sup>3</sup> The number of parcels crossed refers to the number of individual plots of owned land recorded by Delaware County. The number of landowners within the ROW represent the number of individual landowners, who each may own one or more parcels.

<sup>4</sup> Multi-family dwellings include townhomes, condominiums, apartment complexes, and duplexes

**Table 2. Human Environment Evaluation Criteria**

Alternative Route	Unit	A	B	C	D	E	F	G	H	I	J	K	L
<p><i>The following were reviewed for the 12 Alternative Routes but no features were identified: Schools or Places of worship within 1,000 feet of the centerline; Cemeteries, hospitals, or assisted living facilities within 250 feet of centerline; Parks, recreation areas, or scenic byways crossed by the centerline.</i></p>													
<p><b>Protected Land</b></p>													
<p><i>The following were reviewed for the 12 Alternative Routes but no features were identified: Federal/state land, conservation easements, or local public lands crossed by ROW.</i></p>													
<p><b>Cultural Resources</b></p>													
<p><i>The following were reviewed for the 12 Alternative Routes but no features were identified: NRHP-listed and eligible architectural resources within one mile of the centerline; National Historic Landmarks within one mile of the centerline; NRHP-listed Historic Districts within one mile of the centerline; NRHP-listed and eligible archaeological sites within ROW.</i></p>													

## 4.3 Constructability

Constructability is the ability to efficiently and cost effectively engineer, acquire ROW, construct, operate, and maintain the proposed transmission line. Major factors include safety, steep topography, condensed ROWs, heavy angles, access, ability to parallel or utilize existing ROWs, proximity to major highways, etc. A comparison of the constructability considerations for the Alternative Routes is presented at the end of this section in **Table 3**.

### 4.3.1 Engineering

Potential engineering and construction challenges are important to consider when siting a transmission line. Heavy angles, steep topography, nearby communication towers, antennas, and airfields along with narrow ROW alignments are all elements that could ultimately require extensive or non-standard engineering and lead to increases in impacts and overall cost.

The proximity to existing roadway, transmission, and gas pipeline infrastructure could also pose potential engineering and construction challenges. As with paralleling existing infrastructure, crossing over transmission lines, distribution lines, and pipelines may require specialized construction techniques, additional studies, and scheduled outages on the existing lines. The Company attempted to minimize engineering challenges to the greatest extent practicable during the route development process.

### Alternative Comparison

No slopes of 20% or greater were present within the Study Area. Additionally, no communication towers, antennas, or airfields were identified within the Study Area. All routes parallel some portion of local roads, but none parallel state or federal highways. Alternative Route A parallels existing roads for approximately 32% of its total length. Alternative Routes E, F, I, and J parallel existing roads for the least percentage of their total lengths. None of the routes parallel existing pipelines or railroads. None of the routes are impacted by communication towers, cross high voltage transmission lines, or were within one mile of an airport. Alternative Route A is the only route to cross a state highway. Alternative Routes B and D had the fewest heavy turn angles (three and six angles, respectively), and therefore the fewest number of custom-designed structures required.

### 4.3.2 Topographic and Geotechnical

No major constructability geotechnical issues are expected based on a high-level review of soils and topography; however, soil-boring investigations will be conducted before final designs are completed.

### 4.3.3 Right-of-Way

The Company attempted to minimize overall route length, number of parcels crossed, and new ROW acquisition to the greatest extent practicable. Where possible, the Company considered using existing ROW, paralleling existing electric lines, or paralleling other infrastructure (i.e., roadways, railways, or gas lines). Opportunities to parallel existing ROWs were limited to local roads and the Conesville-Trent 138 kV transmission line.

### Alternative Comparison

All routes paralleled some portion of local roads, but no parallel of state or federal highways is present. Alternative Route A parallels existing roads for 32% of its total length, along both Condit Road and Justamere Road. Alternative Routes E, F, I, and J parallel existing roads for the least amount of their total lengths, primarily along Porter Central Road.

### 4.3.4 Operation, Maintenance, and System Considerations

Paralleling existing transmission lines is listed as a routing opportunity; however, paralleling other Extra High Voltage (EHV) transmission lines can also pose reliability concerns. The Alternative Routes were reviewed and **Table 3** lists the mileage each parallels existing EHV transmission lines.

### Alternative Comparison

Alternative Routes A, C, and D were the only routes to parallel an existing transmission line, which was the Conesville-Trent 138 kV transmission line. These parallel areas connect the Alternative Routes to their closest respective alternate switch station location. No other transmission lines were present in the Study Area north of the Conesville-Trent 138 kV transmission line. The Conesville-Hyatt 345 kV transmission line is the only EHV transmission line in the Study Area. It parallels the south side of the Conesville-Trent 138 kV transmission line in the southern portion of the Study Area and does not affect the placement of Alternative Routes or the alternate switch station locations.

### 4.3.5 Other Considerations

The Siting Team also reviewed the constructability of the alternative switch locations and incorporated the results into the identification of the Preferred Route and Alternate Route. As discussed in Section 3.1, the alternative switch locations were identified to reduce potential route length while locating the station next to a public road for ease of access. In addition, the Siting Team determined a switch located on the north side of State Highway 3 would be preferable to the south side of the highway because it decreased the length of proposed transmission line, eliminated one hard angle from the Proposed Route, reduced construction cost, and eliminated the need to cross a state highway.

## Alternative Routes Comparison

Alternative Routes A, B, and C terminate at either the Condit Switch Alternative B location or the Condit Switch Alternative A location, and Alternative Routes D-L terminate at the Condit Switch Alternative C location. There were no significant differentiators between each of the four alternative switch locations. The determination of a Preferred Route and Alternate Route was not based on switch location. Rather the determination of a Preferred Route and Alternate Route were based on input from stakeholders, public input, field reconnaissance, and a quantitative and qualitative impact analysis of environmental, land use, and constructability factors.

**Table 3. Constructability Evaluation Criteria**

Alternative Route	Unit	A	B	C	D	E	F	G	H	I	J	K	L
<b>General</b>													
Length	miles	3.7	3.5	3.5	3.6	3.4	3.5	3.9	3.8	3.6	3.7	4.1	4.0
<b>Transportation Resources</b>													
State highways crossed	count	1	0	0	0	0	0	0	0	0	0	0	0
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Interstate highways, U.S highways, and railroads crossed by centerline; Airports within one mile of the centerline.</i>													
<b>Utility Resources</b>													
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Oil and gas pipelines crossed; oil and gas wells within 250 feet from edge of ROW; Communication towers within 1,000 feet of centerline; Existing transmission lines crossed.</i>													
<b>Engineering and Geotechnical Considerations</b>													
Heavy angles, greater than 30 degrees	count	7	3	9	6	12	10	15	11	11	9	16	12
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Steep slopes (&gt;20%) crossed by ROW</i>													
<b>Rights-of-Way Rebuild/Parallel</b>													
Existing 345 kV transmission lines paralleled	miles	0.1	0	0.3	0.4	0	0	0	0	0	0	0	0
Local roads	miles	1.1	0.5	0.3	0.5	0.04	0.04	0.9	0.9	0.04	0.04	0.9	0.9
<b>Total length paralleled</b>	<b>miles</b>	<b>1.2</b>	<b>0.5</b>	<b>0.6</b>	<b>0.9</b>	<b>0.04</b>	<b>0.04</b>	<b>0.9</b>	<b>0.9</b>	<b>0.04</b>	<b>0.04</b>	<b>0.9</b>	<b>0.9</b>
<b>Total percentage paralleled</b>	<b>percent</b>	<b>32.0</b>	<b>15.5</b>	<b>18.1</b>	<b>25.0</b>	<b>1.3</b>	<b>1.2</b>	<b>22.0</b>	<b>22.9</b>	<b>1.3</b>	<b>1.2</b>	<b>21.0</b>	<b>21.8</b>
<i>The following were reviewed for the 12 Alternative Routes but no features were identified: Existing distribution lines paralleled or underbuilt; Oil and gas pipelines paralleled; Railroads paralleled.</i>													

## 5.0 IDENTIFICATION OF THE PROPOSED ROUTE

The goal in selecting a suitable route for the Project is to minimize overall impacts on natural and human environments while avoiding indirect routes, unreasonable costs, and special design requirements. However, in practice, it is not usually possible to optimally minimize all potential impacts. There are often inherent tradeoffs in potential impacts to every siting decision. For example, in heavily forested study areas, the route that avoids the most developed areas will likely require the greatest amount of forest clearing, while the route that has the least impact on vegetation and wildlife habitats often impacts more residences or farm lands. Thus, an underlying goal of a siting study is to reach a reasonable balance between minimizing potential impacts on one resource versus increasing the potential impacts on another.

Following an extensive data gathering, route development, and comparative analysis process, the Siting Team identified Alternative Route B and C as the most feasible alternative routes. These routes were presented to the public on November 16, 2022 and February 1, 2023 at a Public Information Meeting (PIM) as part of the OPSB Standard Application process. Following the PIM, Alternative Route B was selected by the Siting Team as the **Preferred (Proposed) Route** and Alternative Route C as the **Alternate Route** as shown on **Map 7 (Attachment A)** and the aerial mapbook (**Attachment E**). The following summarizes the rationale for selection of the Preferred Route, and thus, the route that the Siting Team considered to best minimize the overall impacts of the Project. The rationale is derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of the Siting Team, comments from the public and regulatory agencies, and a comparative analysis of potential impacts for all of the alternative routes, presented in Section 4.0. The Alternate Route was identified for the Project in order to comply with OPSB rules.

### 5.1 Preferred and Alternate Route

Based on the Siting Team's extensive qualitative and quantitative review of information obtained from GIS data including aerial photography, existing ROW and property easements, field reconnaissance, agency consultation and public outreach, as well as engineering and financial estimates for the Project, the Siting Team identified Alternative Route B as the Preferred (Proposed) Route and Alternative Route C as the Alternate Route.

#### 5.1.1 Preferred Route

The Preferred Route (Route B) for the Project is the most suitable route, minimizing impacts to residences and environmentally sensitive resources such as forests (and thus tree clearing), floodplains, streams, and wetlands. It also addresses landowner input and concerns by avoiding cemeteries, avoiding the proposed horse farm/ranch expansion area, and paralleling parcel

boundaries rather than bisecting large parcels. Additionally, the Preferred Route maximizes the opportunities for paralleling existing local roads and avoids crossing state or federal highways. The Preferred Route minimizes the number of landowners and parcels impacted by the Project. The number of landowners and parcels within the ROW of Alternative Route B (Preferred Route) is 9 and 17, respectively, whereas the other Alternative Routes' ROWs cross 10-23 landowners and 16-28 parcels. The Preferred Route (3.5 miles) is among the shortest of the Alternative Routes (Alternative Route E is the shortest at 3.4 miles), is one of the Alternative Routes that would require the least amount of tree clearing, and the Preferred Route also has the fewest heavy turn angles (six). While the Preferred Route crosses parcels with ODA agricultural easements, those agricultural easements will still be able to be used as farmland, with the exception of the footprint of the actual pole locations. As currently proposed, the total number of poles that would be located within ODA agricultural easements on the Preferred Route is 12. The permanent impact to agricultural land at each pole location is approximately 0.0001 acres/6 square feet, for a total of only 0.0017 acres/72 square feet on the Preferred Route. Additionally, the Preferred Route is primarily located along the edges of the ODA agricultural easement parcels in order to further reduce impacts. Lastly, the Condit Switch Alternative B location has access to a public road (State Highway 3), does not require the connecting greenfield transmission line to cross a highway, and minimizes the Proposed Route's length.

Collectively, the Siting Team believes the Preferred Route is (1) most consistent with the siting guidelines; (2) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (3) minimizes special design requirements and unreasonable costs; and (4) can be constructed and operated in a safe, timely, and reliable manner.

### **5.1.2 Alternate Route**

As required by the OPSB Rule 4906-3-05, the Alternate Route must not have more than 20% in common with the Preferred Route. Alternative Route C meets this criterion and was selected as the Alternate Route. Alternative Route C has no residences within 100 feet of centerline, is of similar short length to the Preferred Route at 3.5 miles, is one of the Alternative Routes that would require the least amount of tree clearing, and is one of the Alternative Routes that crosses the least amount of streams. The Alternate Route also crosses parcels with ODA agricultural easements. It crosses slightly more linear feet of agricultural easements than the Preferred Route and its ROW crosses slightly more acres of agricultural easements than the Preferred Route. However, those agricultural easements will still be able to be utilized as farmland, with the exception of the footprint of the actual pole locations. As currently proposed, the total approximate number of poles that would be located within ODA agricultural easements on the Alternate Route is 12. The permanent impact to agricultural land at each pole location is 0.0001 acres/6 square feet, for a total of only 0.0017 acres/72 square feet on the Preferred Route.

Additionally, the Alternate Route is primarily located along the edges of the ODA agricultural easement parcels in order to further reduce impacts. Collectively, the Siting Team concludes that the Alternate Route has relatively low impacts on land use and property owners (based on the lower number of property owners affected [13 property owners]) and is a viable option for construction. **Attachment E** consists of an aerial mapbook to illustrate the selected Alternate Route.

## 5.2 Revisions After Selection of the Preferred and Alternate Routes

Following selection of the Preferred Route and Alternate Route, an adjustment to each route was made. Along the Preferred Route, an alignment shift between Justamere Road and Centerburg Road was made due to further discussion with the property owner. A portion of the centerline of the Preferred Route was shifted east in order to minimize tree clearing within forested areas and to align the Preferred Route closer to the edges of parcel boundaries. Additionally, a portion of the Alternate Route located just north of Centerburg Road was shifted to the west based on landowner comments received in response to the November 16, 2022 PIM, in order to avoid visual impacts to a residence and avoid having a transmission line structure and centerline within relatively close proximity and within the view of a proposed pool, pool house, and other associated features.

The shifts in the alignments of the Preferred Route and Alternate Route resulting from the landowner discussions and preferences is depicted in **Map 8 (Attachment A)**. The revised final Preferred Route and Alternate Route alignments are also included in **Attachment E – Aerial Mapbook**.

## 6.0 REFERENCES

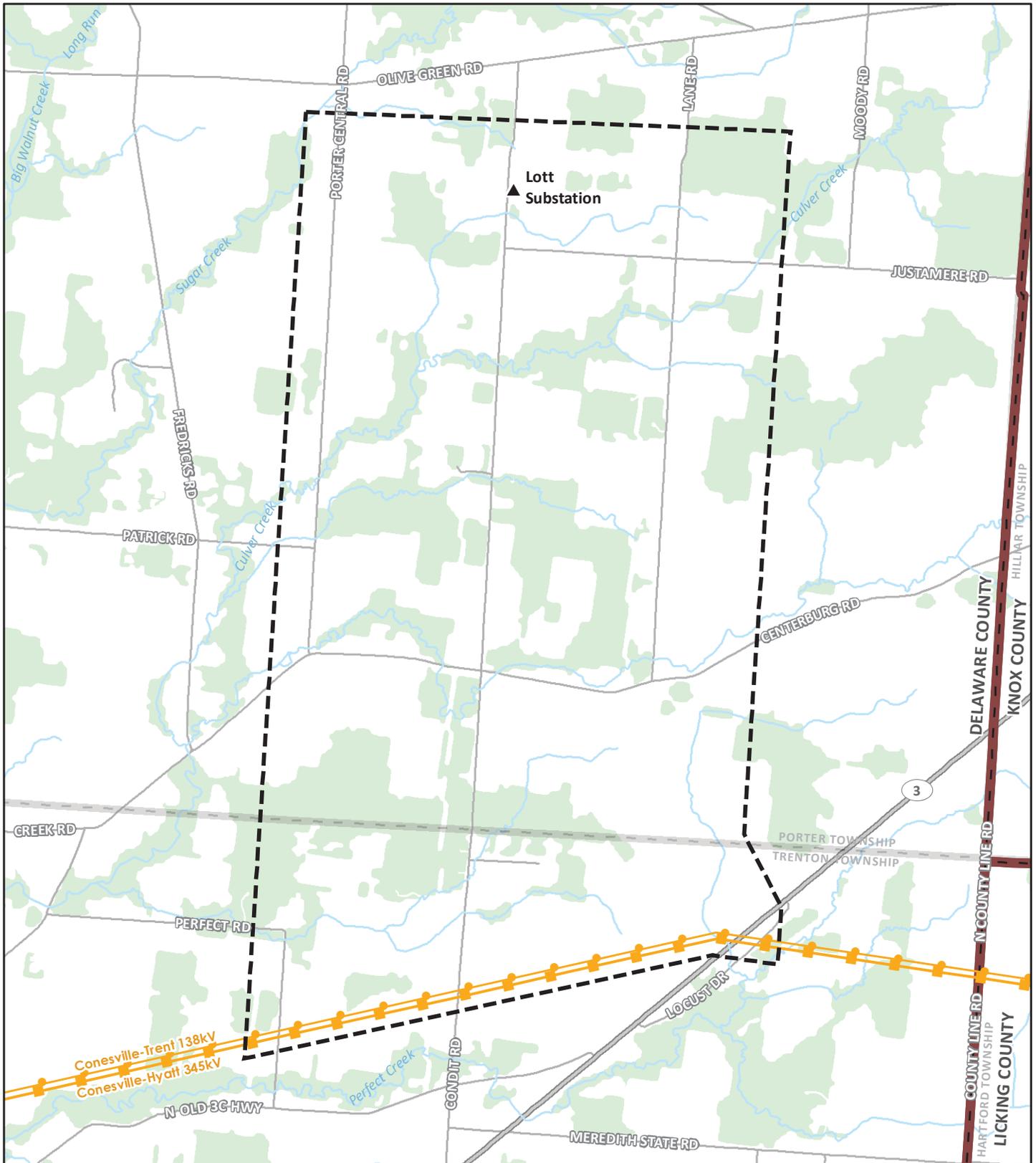
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## **Attachment A: Maps**

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Existing Substation	Forested Area
Study Area	Highway
Existing Transmission Line (115 kV to 230 kV)	Local Road
Existing Transmission Line (345 kV +)	Township Boundary
Stream (NHD)	County Boundary
Waterbody (NHD)	

Data Sources: AEP (2020), Stantec (2020), USGS (2018), USGS NHD (2018), OGRIP (2018)

Coordinate System: State Plane Ohio North NAD 83

February 16, 2023

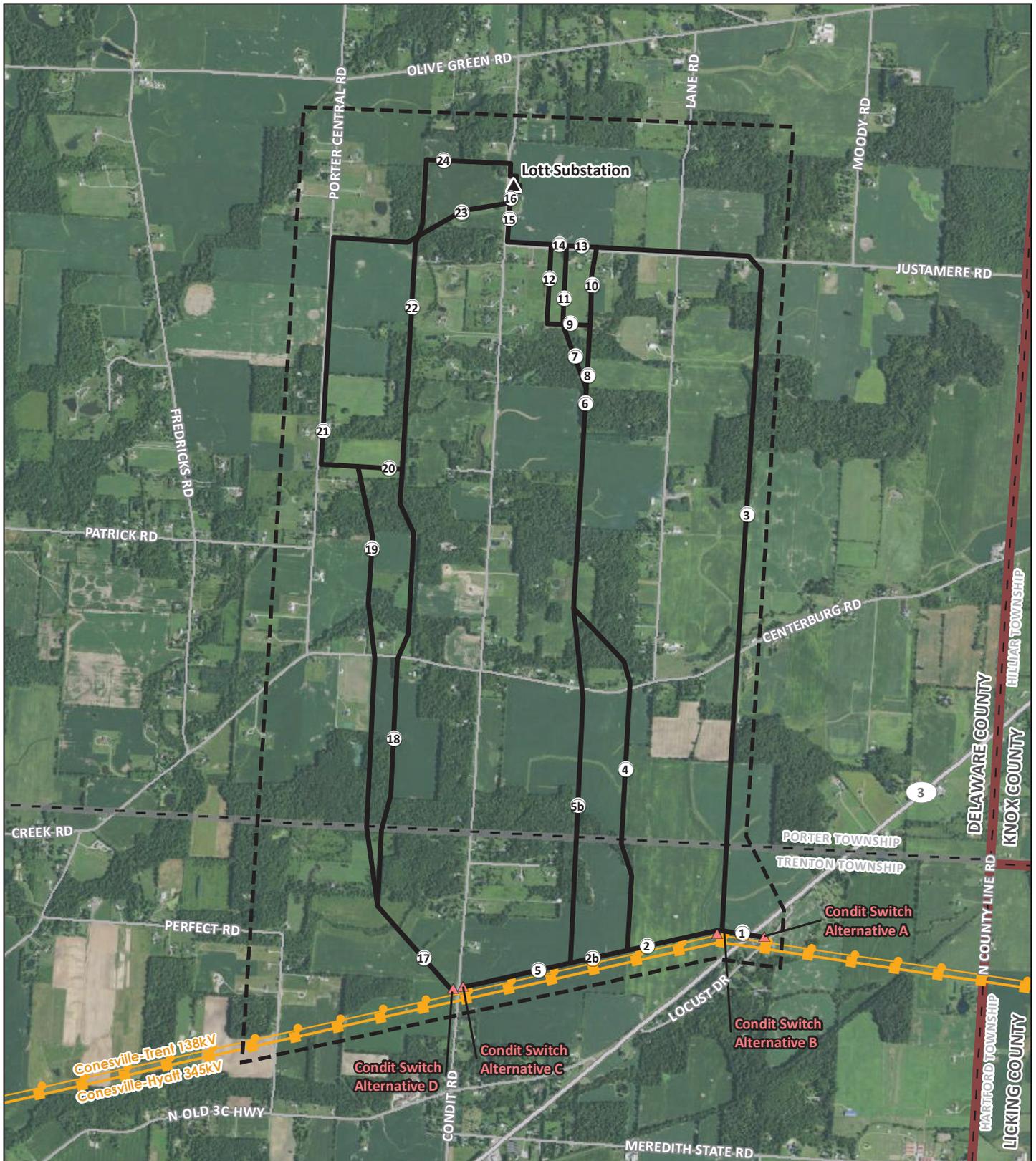


**Map 1**  
**Study Area**

**Lott 138 kV**  
**Transmission Line Project**

An AEP Company  
"BOUNDLESS ENERGY"

0      0.25      0.5  
Miles



- ▲ Existing Substation
- ▲ Preliminary Switch Location
- Segment Network
- Study Area
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Highway
- Local Road
- ▭ Township Boundary
- ▭ County Boundary

Data Sources: AEP (2020), Stantec (2020), NAIP (2019), USGS NHD (2018), OGRIP (2018)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023

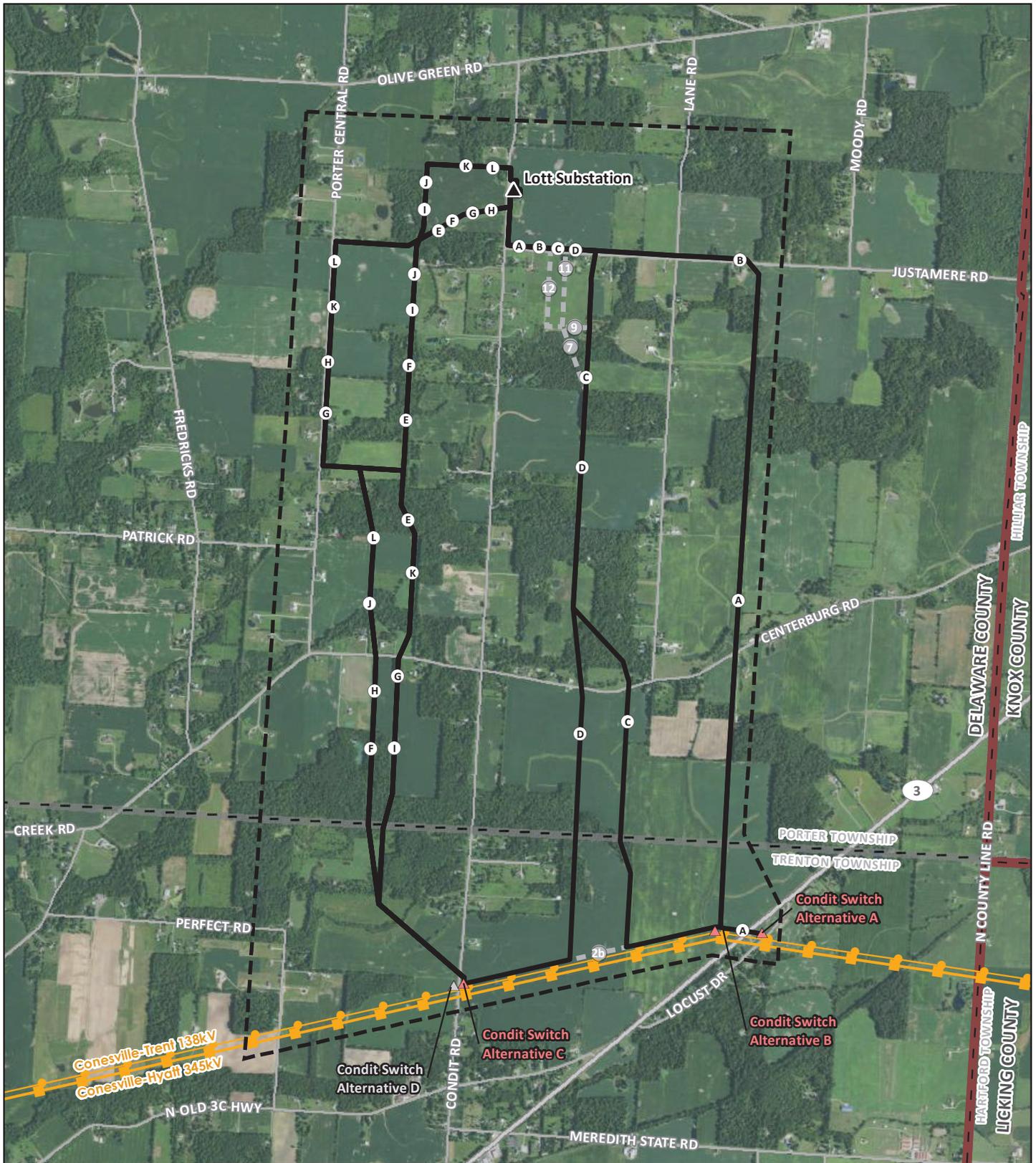


### Map 2 Segment Network Map

**Lott 138 kV  
Transmission Line Project**

AEP OHIO  
A: AEP's Company  
BOUNDLESS ENERGY

0    0.25    0.5  
Miles



▲ Existing Substation	— Highway
▲ Preliminary Switch Location	— Local Road
▲ Eliminated Switch Location	— Township Boundary
— Route Option	— County Boundary
— Eliminated Study Segment	
— Study Area	
— Existing Transmission Line (115 kV to 230 kV)	
— Existing Transmission Line (345 kV +)	

Data Sources: AEP (2020), Stantec (2020), NAIP (2019) OGRIP (2018)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023

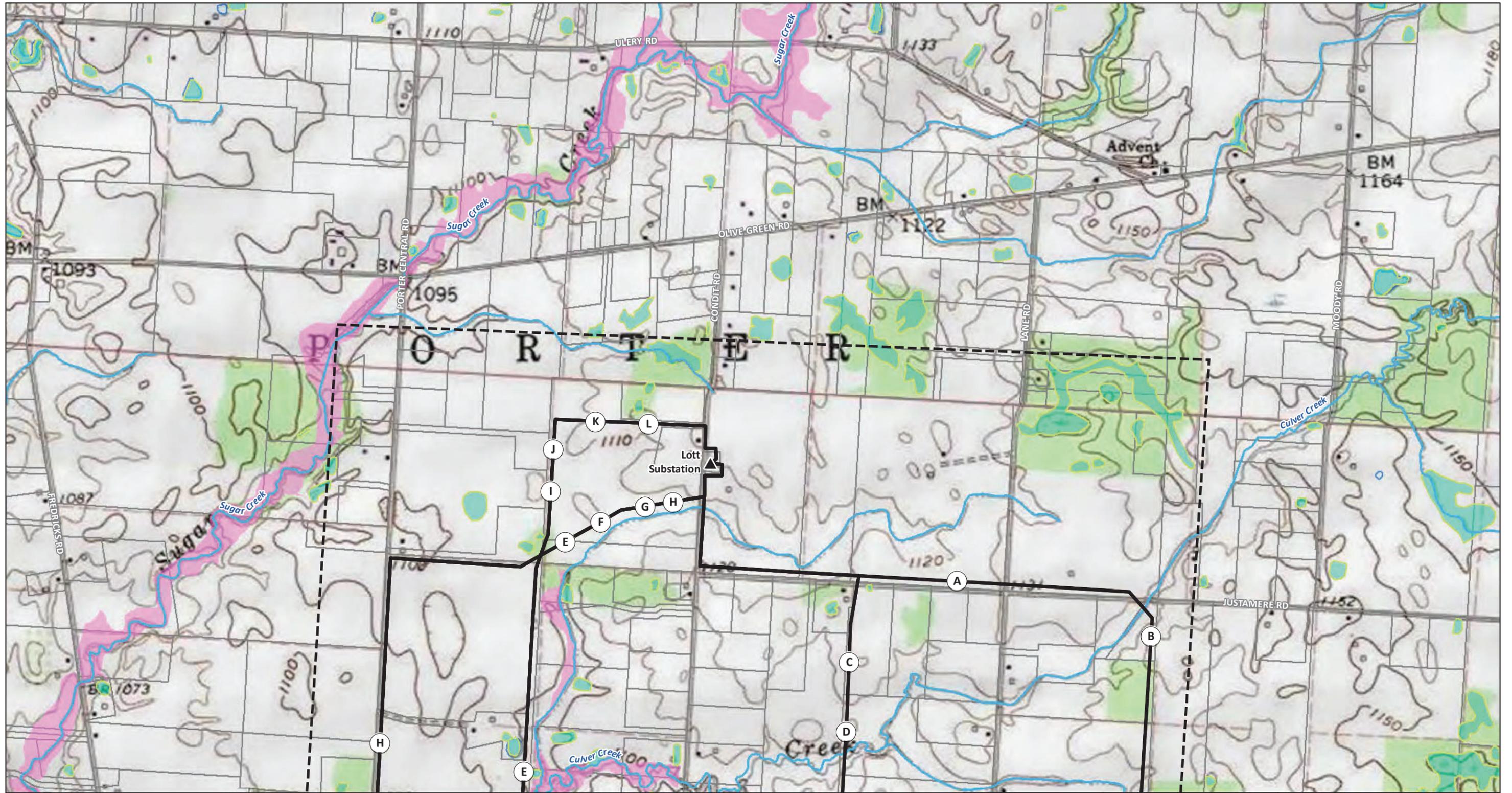


**Map 3**  
**Alternative Routes Map**

**AEP OHIO**  
A: AEP Company  
BOUNDLESS ENERGY

**Lott 138 kV**  
**Transmission Line Project**

0 0.25 0.5  
Miles



- Existing Substation
- Preliminary Switch Location
- Route Option
- Study Area
- Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Stream (NHD)
- Waterbody (NHD)
- National Wetlands Inventory Feature
- 100-year Flood Zone

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), FEMA (2019), USFWS (2019), USGS (2019), Delaware County (2020)

Coordinate System: State Plane Ohio North NAD 83



February 24, 2023



**Map 4**  
**Natural Resources Map**

Lott 138 kV  
Transmission Line Project

0 500 1,000  
Feet

Note: USGS 7.5' Topographic Quadrangle basemap displays forested area and 10' elevation contour data.



- ▲ Existing Substation
- ▲ Preliminary Switch Location
- Route Option
- ▭ Study Area
- ▭ Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Stream (NHD)
- Waterbody (NHD)
- National Wetlands Inventory Feature
- 100-year Flood Zone

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), FEMA (2019), USFWS (2019), USGS (2019), Delaware County (2020)

Coordinate System: State Plane Ohio North NAD 83

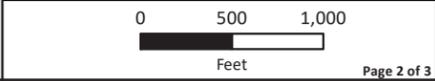


February 24, 2023

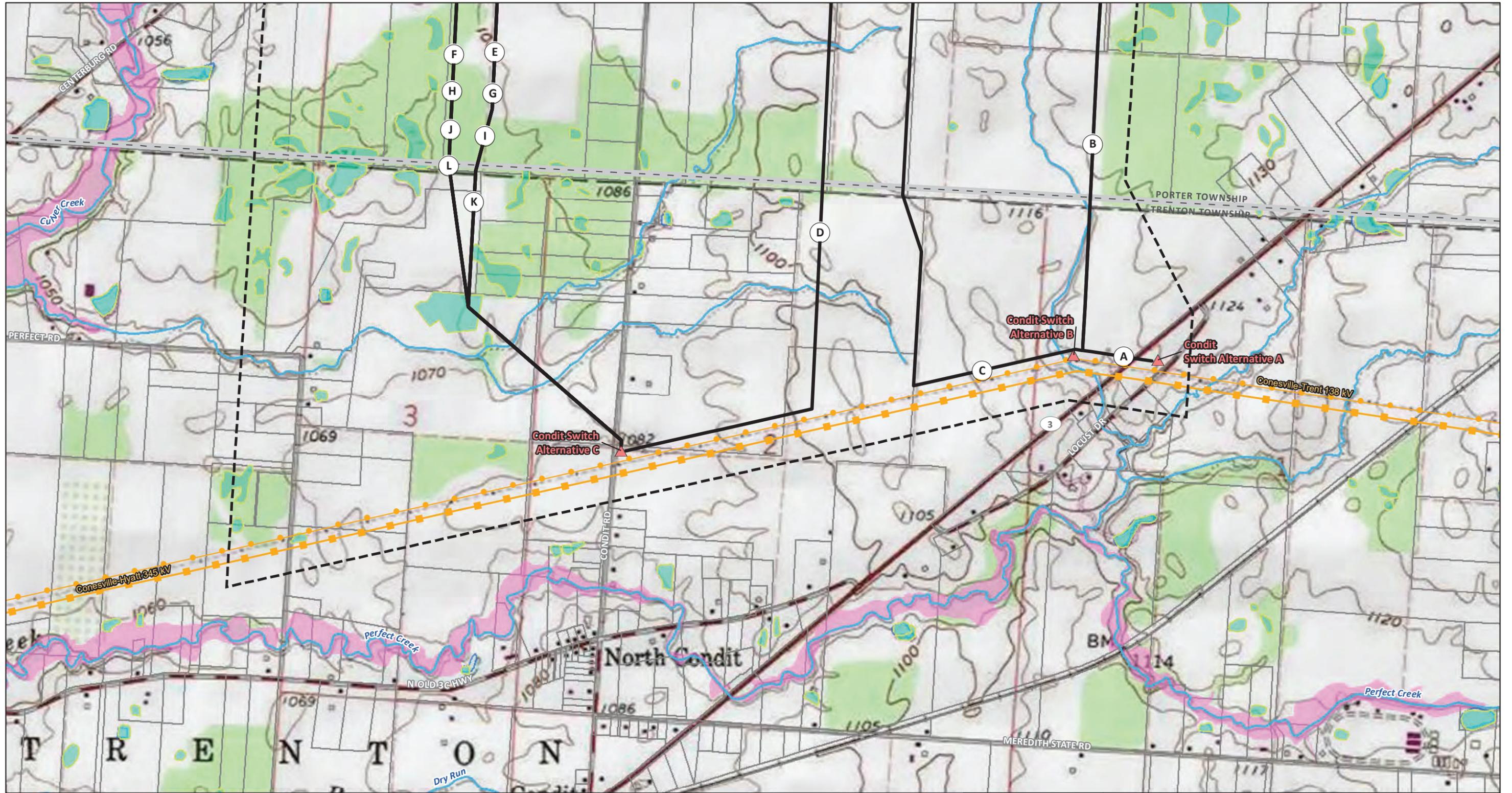


### Map 4 Natural Resources Map

Lott 138 kV  
Transmission Line Project



Note: USGS 7.5' Topographic Quadrangle basemap displays forested area and 10' elevation contour data.



- ▲ Existing Substation
- ▲ Preliminary Switch Location
- Route Option
- Study Area
- Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Stream (NHD)
- Waterbody (NHD)
- National Wetlands Inventory Feature
- 100-year Flood Zone

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), FEMA (2019), USFWS (2019), USGS (2019), Delaware County (2020)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023

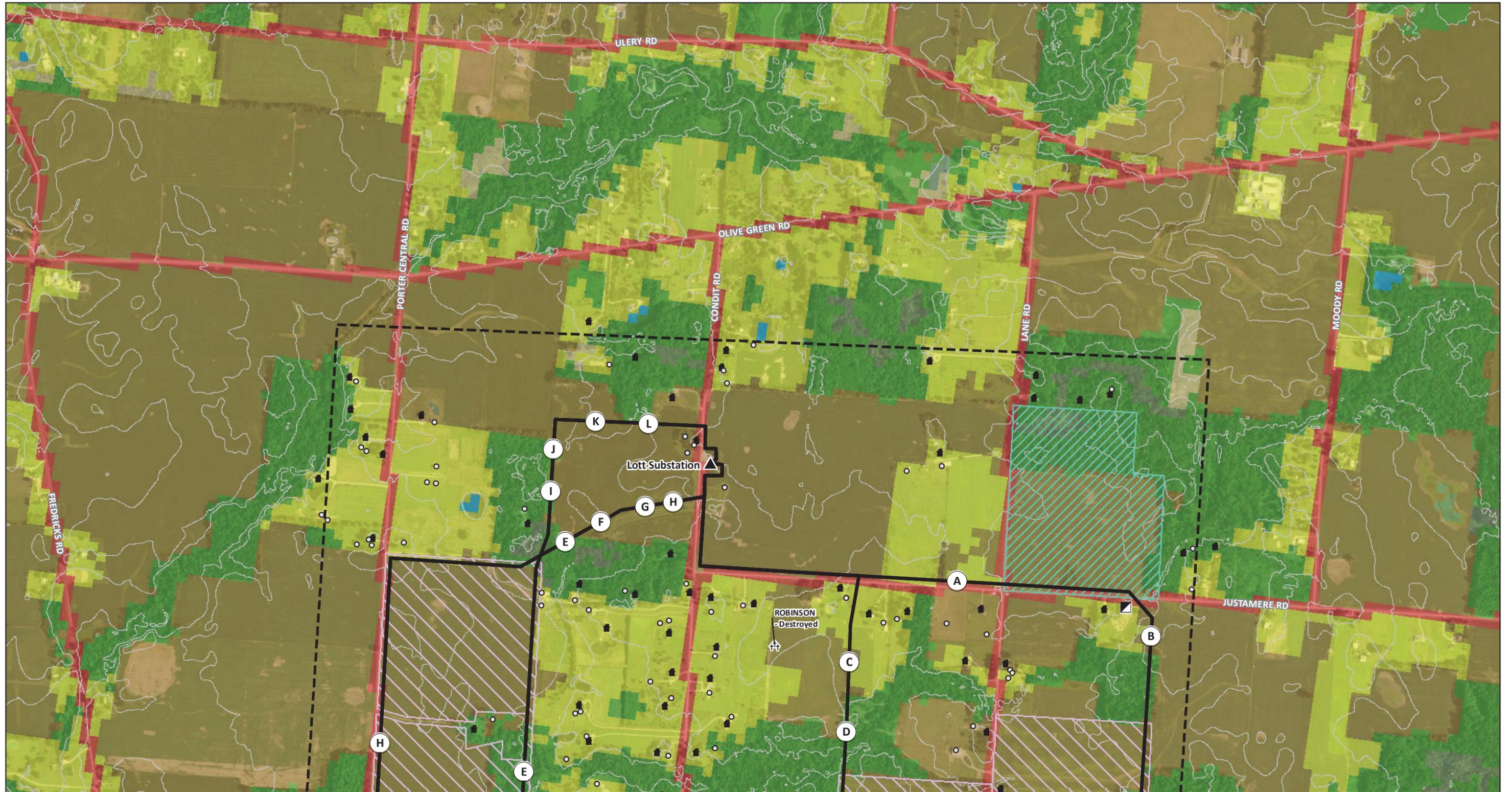


**Map 4**  
**Natural Resources Map**

Lott 138 kV  
Transmission Line Project

Page 3 of 3

Note: USGS 7.5' Topographic Quadrangle basemap displays forested area and 10' elevation contour data.



- Existing Substation
- Preliminary Switch Location
- Route Option
- Study Area
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- 10-Foot Contour
- Lane Road Historic Bridge
- Cemetery
- Place of Worship
- Water Tower
- Single Family Residence
- Commercial/Business
- Outbuilding
- Parcel with CRP Easement
- Parcel with ODA Agricultural Easement

- Land Use**
- Cultivated Crops
  - Deciduous/Evergreen/Mixed Forest
  - Developed
  - Emergent Herbaceous Wetlands
  - Hay/Pasture/Herbaceous
  - Open Water
  - Shrub/Scrub
  - Woody Wetlands

Data Sources: AEP (2020), Stantec (2020), NLCD (2016), USGS NHD (2018), NAIP (2019), OGRIP (2018), Weller (2020)

Coordinate System: State Plane Ohio North NAD 83

March 01, 2023

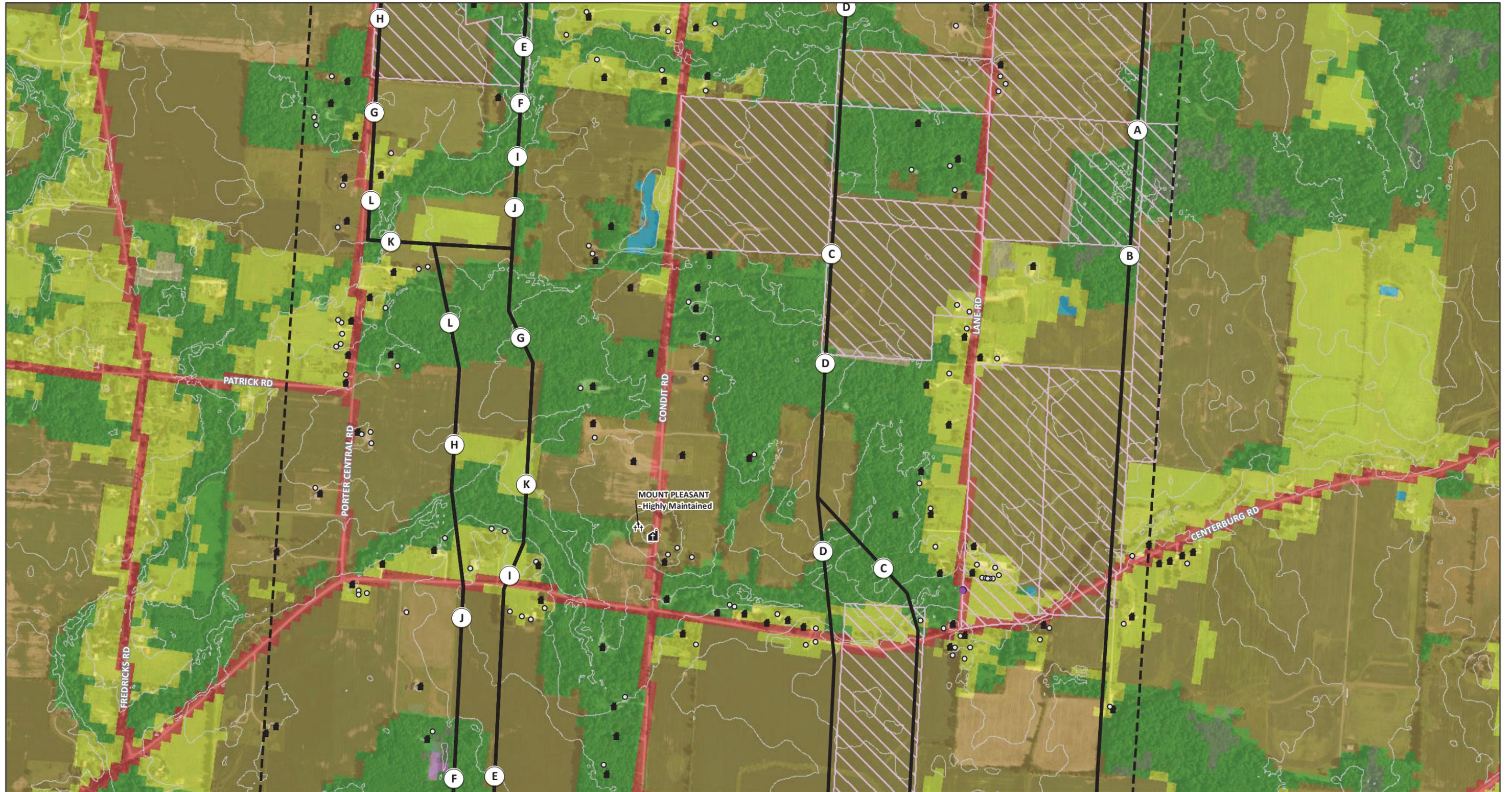


**Map 5**  
**Land Use Map**

Lott 138 kV  
Transmission Line Project

0 500 1,000  
Feet

Page 1 of 3



- ▲ Existing Substation
- ▲ Preliminary Switch Location
- Route Option
- ▭ Study Area
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- ~ 10-Foot Contour
- Lane Road Historic Bridge
- ⛪ Cemetery
- ⛪ Place of Worship
- ⛪ Water Tower
- ⛪ Single Family Residence
- ⛪ Commercial/Business
- Outbuilding
- ▨ Parcel with CRP Easement
- ▨ Parcel with ODA Agricultural Easement

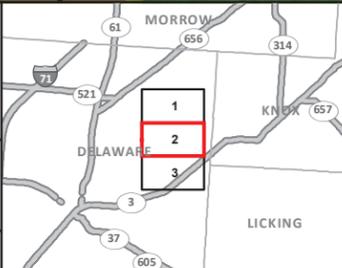
- Land Use**
- Cultivated Crops
  - Deciduous/Evergreen/Mixed Forest
  - Developed
  - Emergent Herbaceous Wetlands
  - Hay/Pasture/Herbaceous
  - Open Water
  - Shrub/Scrub
  - Woody Wetlands

Data Sources: AEP (2020), Stantec (2020), NLCD (2016), USGS NHD (2018), NAIP (2019), OGRIP (2018), Weller (2020)

Coordinate System: State Plane Ohio North NAD 83



March 01, 2023

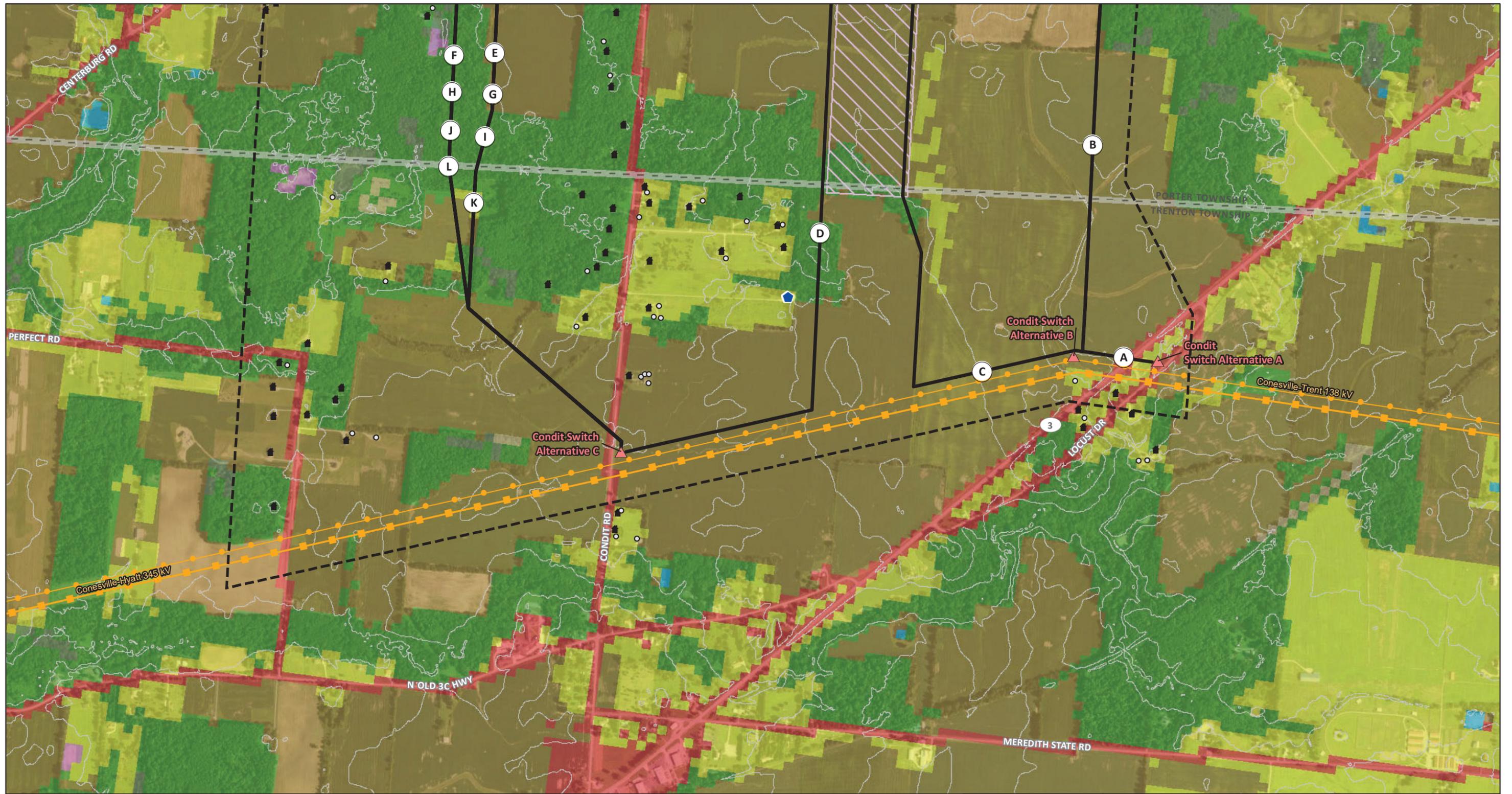


**Map 5**  
**Land Use Map**

Lott 138 kV  
Transmission Line Project

0 500 1,000  
Feet

Page 2 of 3



- ▲ Existing Substation
- ▲ Preliminary Switch Location
- Route Option
- ▭ Study Area
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- ~ 10-Foot Contour
- Lane Road Historic Bridge
- ⛪ Cemetery
- ⛪ Place of Worship
- ⛪ Water Tower
- ⛪ Single Family Residence
- ⛪ Commercial/Business
- Outbuilding
- ▨ Parcel with CRP Easement
- ▨ Parcel with ODA Agricultural Easement

- Land Use**
- Cultivated Crops
  - Deciduous/Evergreen/Mixed Forest
  - Developed
  - Emergent Herbaceous Wetlands
  - Hay/Pasture/Herbaceous
  - Open Water
  - Shrub/Scrub
  - Woody Wetlands

Data Sources: AEP (2020), Stantec (2020), NLCD (2016), USGS NHD (2018), NAIP (2019), OGRIP (2018), Weller (2020)

Coordinate System: State Plane Ohio North NAD 83

March 01, 2023



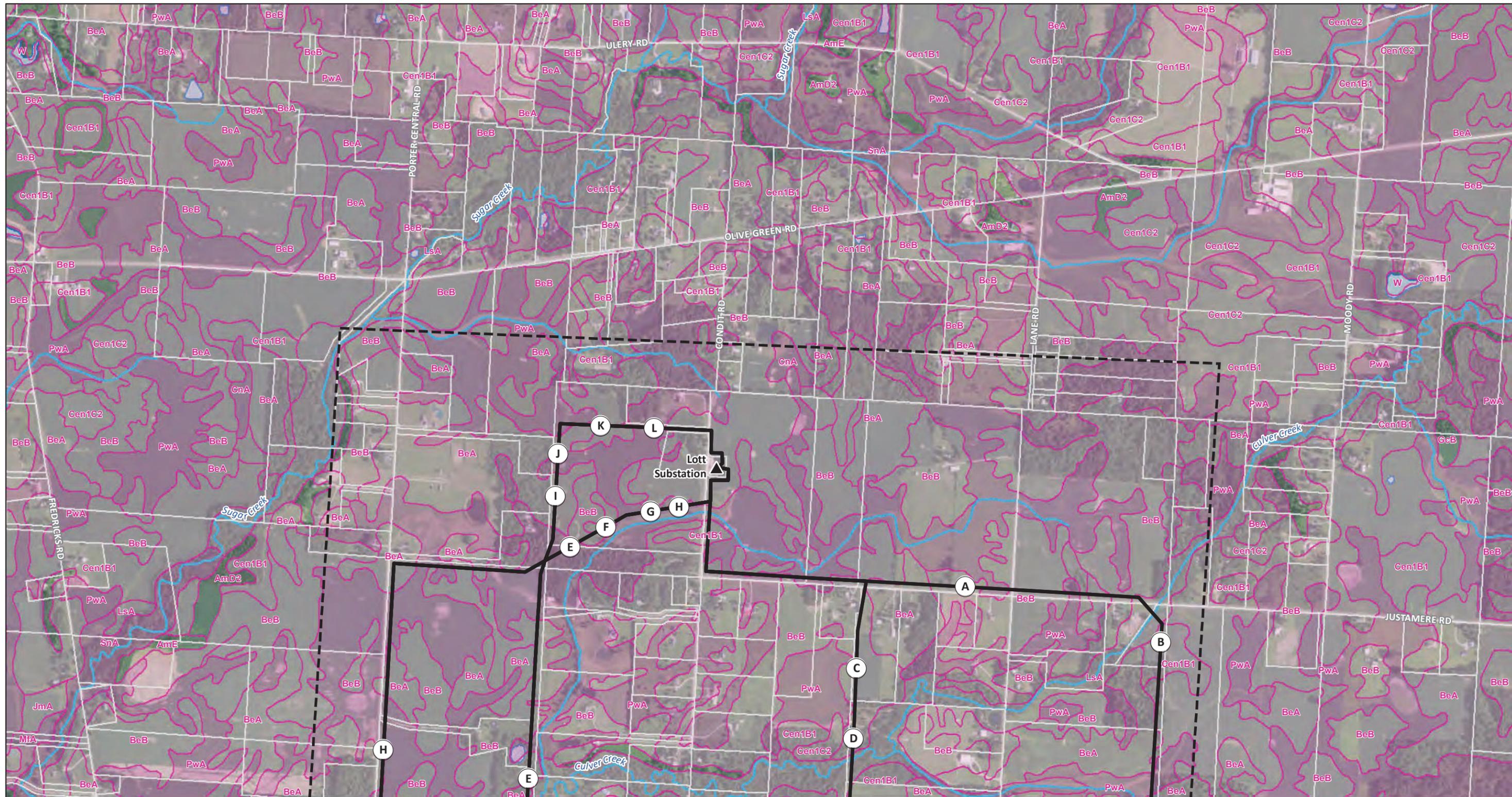
**Map 5**  
**Land Use Map**

Lott 138 kV  
Transmission Line Project

AEP OHIO  
As an AEP Company  
BOUNDLESS ENERGY™

0 500 1,000  
Feet

Page 3 of 3



▲ Existing Substation	Stream (NHD)			
▲ Preliminary Switch Location	Waterbody (NHD)			
— Route Option	NRCS Soil Survey Data			
--- Study Area	Hydric Ratings			
▭ Parcel Boundary	<table border="0"> <tr><td>■ Predominantly Hydric Soil</td></tr> <tr><td>■ Partially Hydric Soil</td></tr> <tr><td>■ Non-Hydric Soil</td></tr> </table>	■ Predominantly Hydric Soil	■ Partially Hydric Soil	■ Non-Hydric Soil
■ Predominantly Hydric Soil				
■ Partially Hydric Soil				
■ Non-Hydric Soil				
— Existing Transmission Line (115 kV to 230 kV)				
— Existing Transmission Line (345 kV +)				

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), USGS (2019), NRCS (2021), Delaware County (2020), NAIP (2019)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023



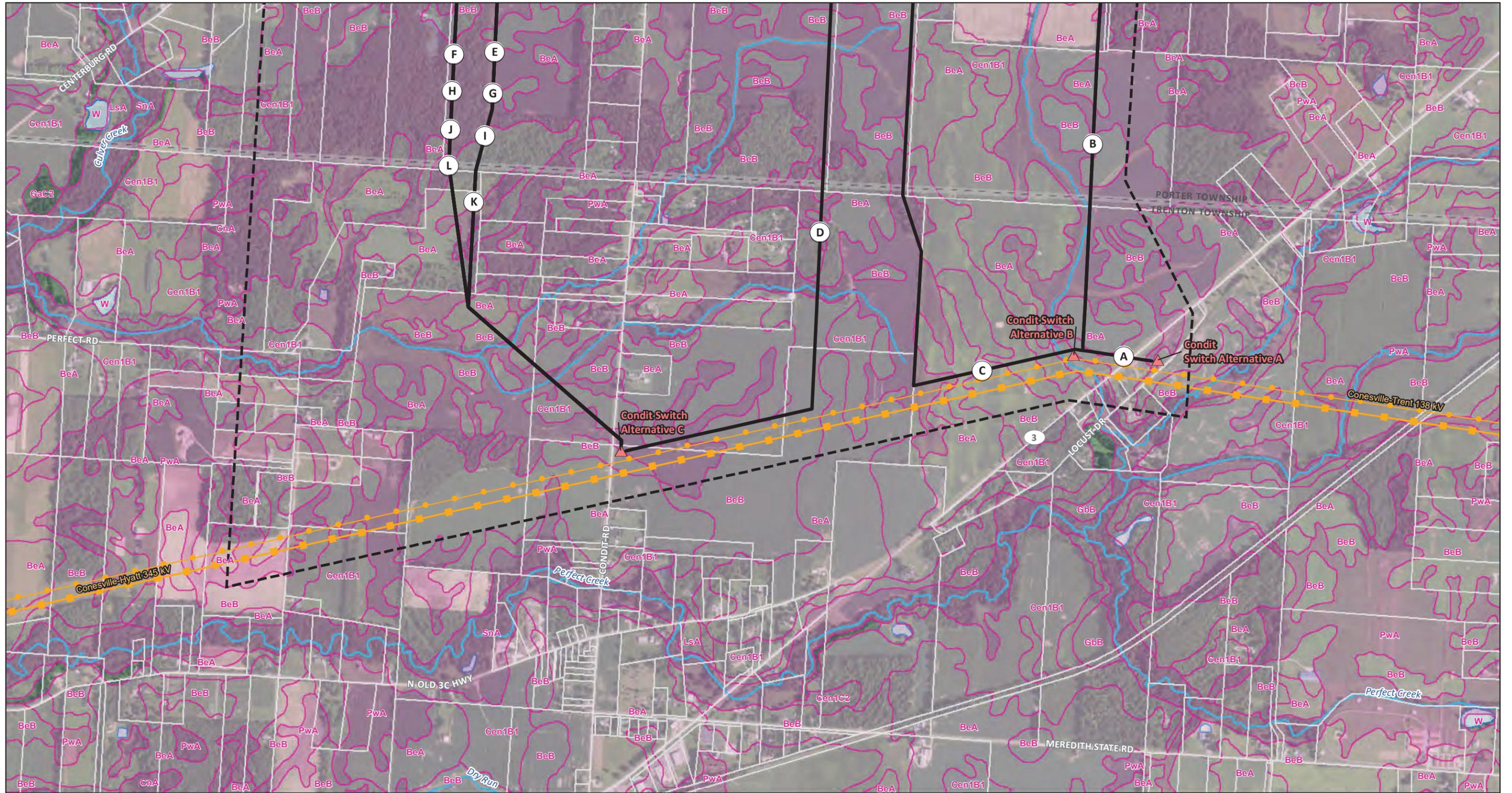
**Map 6**  
**NRCS Soil Survey Map**

Lott 138 kV  
Transmission Line Project

0 500 1,000  
Feet

Page 1 of 3





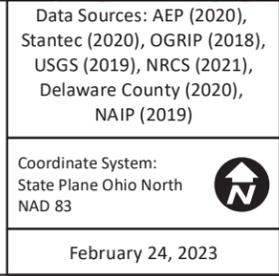
- Existing Substation
- Preliminary Switch Location
- Route Option
- Study Area
- Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)

- Stream (NHD)
- Waterbody (NHD)
- NRCS Soil Survey Data
- Hydric Ratings
- Predominantly Hydric Soil
- Partially Hydric Soil
- Non-Hydric Soil

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), USGS (2019), NRCS (2021), Delaware County (2020), NAIP (2019)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023



**Map 6**  
**NRCS Soil Survey Map**

Lott 138 kV  
Transmission Line Project

0 500 1,000  
Feet

Page 3 of 3



- Existing Substation
- Preliminary Switch Location
- Preferred Route (Route B)
- Alternate Route (Route C)
- Study Area
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Highway
- Local Road
- Township Boundary
- County Boundary

Data Sources: AEP (2020), Stantec (2020), NAIP (2019) OGRIP (2018)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023

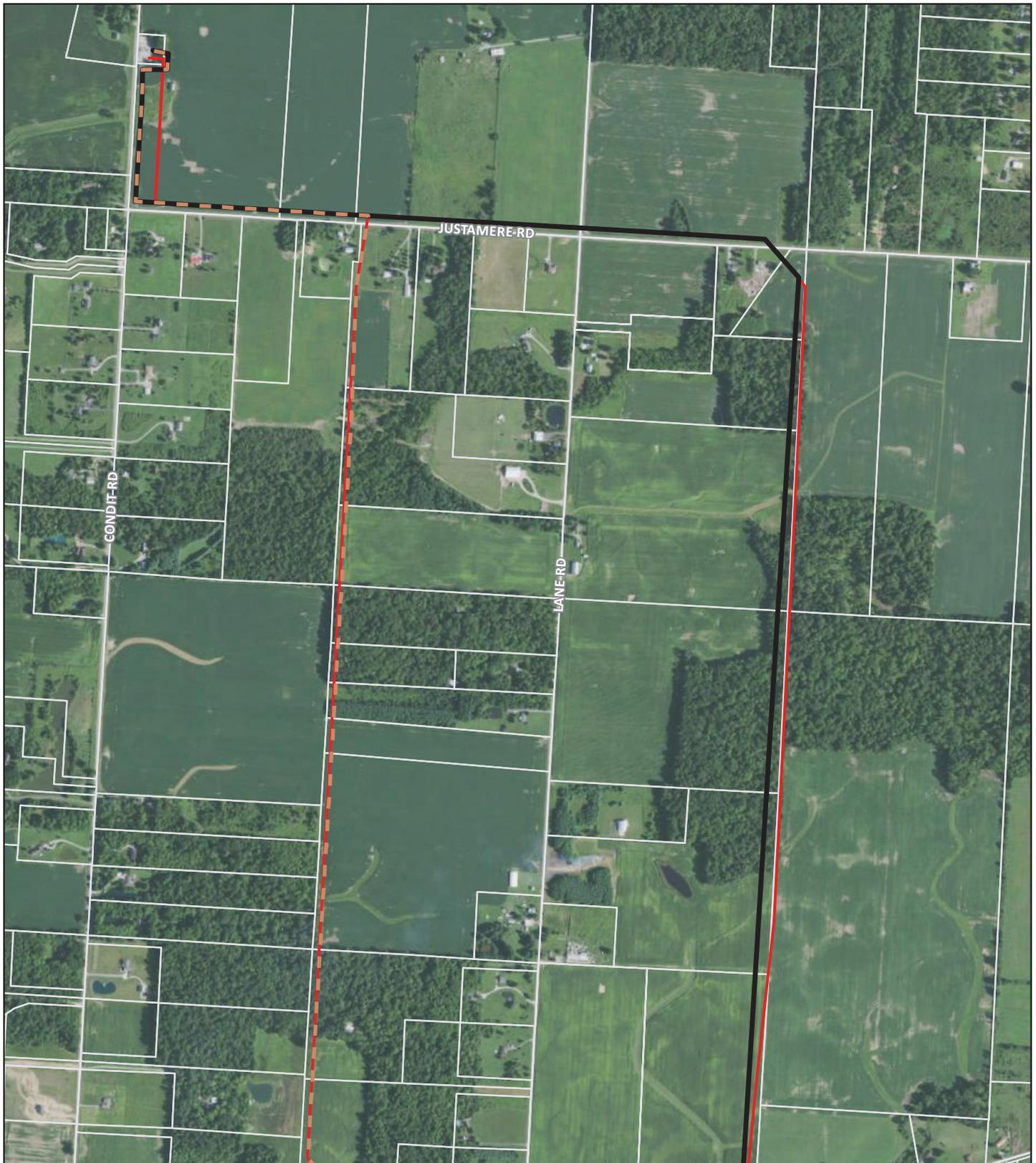


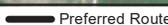
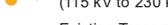
**Map 7**  
**Preferred Route and**  
**Alternate Route Map**

A: AEP Company  
**BOUNDLESS ENERGY**

**Lott 138 kV**  
**Transmission Line Project**

Miles



-  Preferred Route
-  Alternate Route
-  Preferred and Alternate Route Adjustments (After Siting Study)
-  Existing Transmission Line (115 kV to 230 kV)
-  Existing Transmission Line (345 kV +)
-  Parcel Boundary

Data Sources: AEP (2020), Stantec (2020), NAIP (2019), Delaware County (2020), OGRIP (2018)

Coordinate System: State Plane Ohio North NAD 83



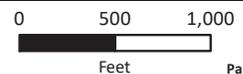
February 17, 2023

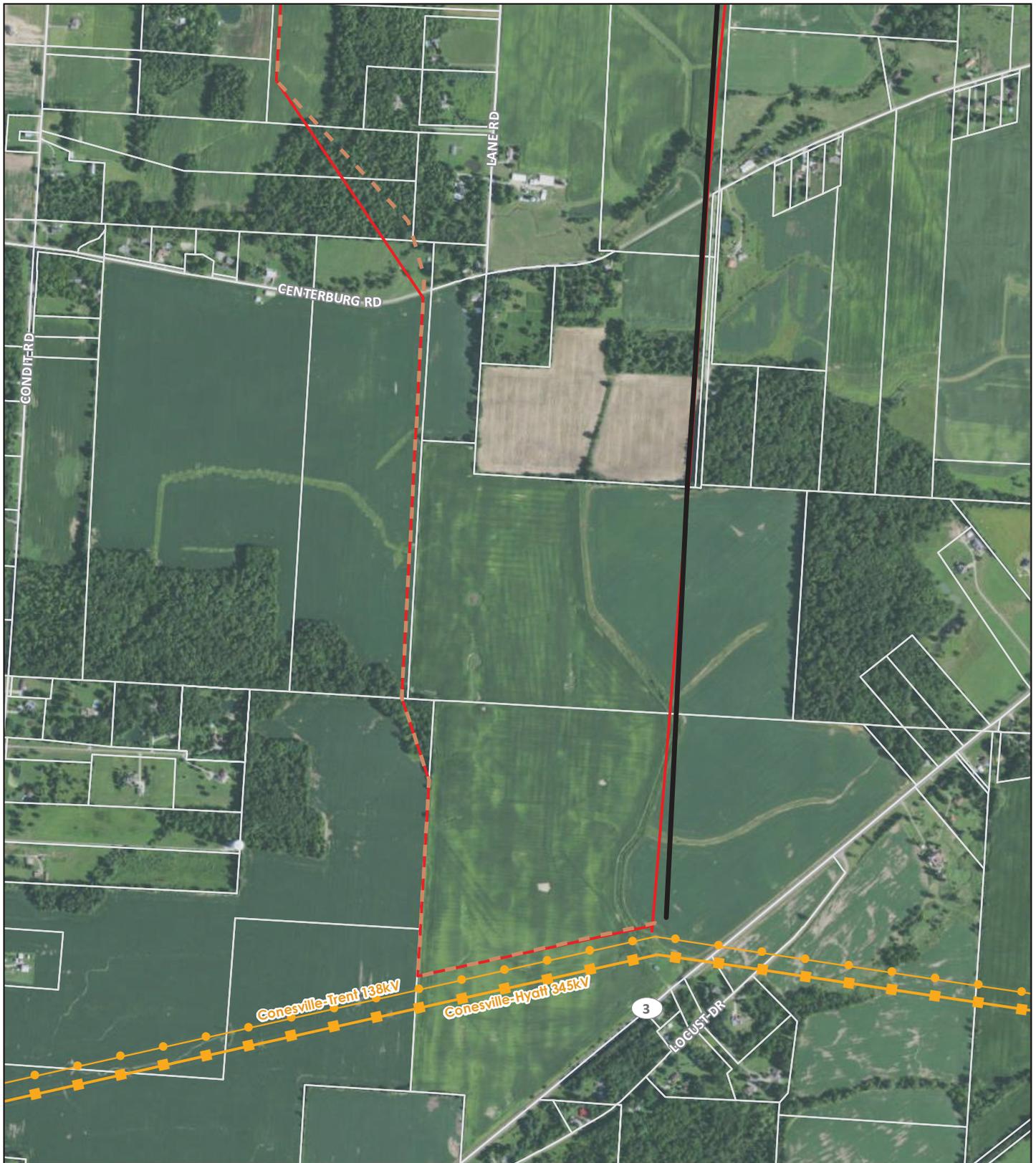


### Map 8 Preferred and Alternate Route Adjustments



Lott 138 kV  
Transmission Line Project





- Preferred Route
- Alternate Route
- Preferred and Alternate Route Adjustments (After Siting Study)
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Parcel Boundary

Data Sources: AEP (2020), Stantec (2020), NAIP (2019), Delaware County (2020), OGRIP (2018)

Coordinate System: State Plane Ohio North NAD 83



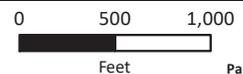
February 17, 2023



### Map 8 Preferred and Alternate Route Adjustments



Lott 138 kV  
Transmission Line Project



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## **Attachment B: GIS Data Sources**

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Attachment B. GIS Data Sources		
Siting Criteria	Source	Description
Land Use		
Number of parcels crossed by the ROW	Delaware County Auditor's Office (2020)	Count of the number of parcels crossed by the ROW
Number of residences and outbuildings within 500 feet of the route centerline	Digitized from NAIP (2018), ESRI World Imagery (2019), and field verified from points of public access	Count of the number of residences within the ROW and within 500 feet of potential routes
Number of commercial buildings within 500 feet of the route centerline	Digitized from NAIP (2018), ESRI World Imagery (2019), and field verified from points of public access	Count of the number of commercial buildings within the ROW and within 500 feet of potential routes
Land use acreage within the ROW	NLCD (2016)	The NLCD 2016 (NLCD 2016) compiled by the Multi-Resolution Land Characteristics (MRLC) Consortium includes 15 classes of land cover from Landsat satellite imagery
Acres of conservation easements crossed	National Conservation Easement Database (NCED) (2020)	Private conservation easements crossed by the routes from the NCED which is comprised of voluntarily reported conservation easement information from land trusts and public agencies
Number of archaeological resources within the ROW and within 1.0 mile	Ohio Office of State Archaeology (2020), Ohio State Historic Preservation Office (2020)	Previously identified archaeological resources listed or eligible on the National Register of Historic Places (NRHP) acquired from the Ohio Office of State Archaeology (2020) and the Ohio State Historic Preservation Office (2020)
Number of historic architectural resources within the ROW and within 1.0 mile	Ohio Heritage Council (2020), Ohio State Historic Preservation Office (2020)	Previously identified historic architectural resource sites and districts listed or eligible on the NRHP acquired from Ohio Heritage Council (2020) and the Ohio State Historic Preservation Office (2020)
Number of cemeteries and hospitals within 250 feet of the centerline	ESRI (2019)	Count of the number of cemeteries and hospitals within 250 feet of potential routes. These features were field verified.

<b>Attachment B. GIS Data Sources</b>		
<b>Siting Criteria</b>	<b>Source</b>	<b>Description</b>
Institutional uses (schools, places of worship, libraries, museums, etc.) within 1,000 feet of the route centerline	ESRI (2019)	This dataset includes the locations of churches, schools, museums, libraries, government buildings, and daycares. Features within 1,000 feet of potential routes were field verified.
Airfield and heliports within one mile of the route centerline	FAA (2019)	Distance from airfields and heliports
<b>Natural Environment</b>		
Forest clearing within the ROW	Digitized based on NAIP (2018) and ESRI World Imagery (2019)	Acres of forest within the ROW
Number of National hydrography dataset (NHD) stream and waterbody crossings within the ROW	USGS (2019)	The NHD is a comprehensive set of digital spatial data prepared by the USGS that contains information about surface water features such as lakes, ponds, streams, rivers, springs and wells
Acres of National Wetland Inventory (NWI) wetland crossings within the ROW	U.S. Fish and Wildlife Service (USFWS) (2020)	The NWI produces information on the characteristics, extent, and status of the Nation's wetlands and deepwater habitats
Acres of 100-year floodplain crossing within the ROW	FEMA - National Flood Hazard Layer Ohio (2020), National Flood Hazard Layer Ohio (2017)	Acres of 100-year floodplain within the ROW
Miles of public lands crossed by the route	Protected Areas Database of the United States (2019), ODNR (2020)	Miles of federal, state and local lands crossed by the ROW
Threatened, endangered, rare, or sensitive species occurrence within the Project vicinity	ODNR Office of Real Estate (2020), USFWS (2019)	Known occurrences; locations of potential habitat based on land use
Sensitive habitat crossed	ODNR Office of Real Estate (2020), USFWS (2019)	

<b>Attachment B. GIS Data Sources</b>		
<b>Siting Criteria</b>	<b>Source</b>	<b>Description</b>
Percent of hydric soils within the ROW	United States Department of Agriculture (USDA-NRCS), Natural Resources Conservation Service Soil Survey Geographic (SSURGO) Database – Delaware County, OH (2019)	Percent of soil associations crossed by the ROW characterized as hydric, predominantly hydric, partially hydric and non-hydric
Percent of prime farmland soils and soils of statewide importance within the ROW	USDA-NRCS SSURGO Database – Delaware County, OH (2019)	Percent of soil associations crossed by the ROW characterized as prime farmland or farmland of statewide importance
Acres of karst topography within the ROW	ODNR (2018)	Acres of karst topography within the ROW
Ohio Superior High Quality and Exceptional Waters	Ohio EPA (2020)	Count of high/exceptional/special protection streams crossed by the centerline
<b>Technical</b>		
Route length	Measured in GIS	Length of route in miles
Number and severity of angled structures	Developed in GIS	Anticipated number of angled structures >20 degrees based on preliminary design
Number of road crossings	North America Detailed Streets (NADS) (2012)	Count of federal, state and local roadway crossings
Number of pipeline crossings	U.S. Department of Transportation National Pipeline Mapping System (2020)	Number of known pipelines crossed by the transmission ROW
Number of transmission line crossings	PennWell Power Data (2019)	Number of high voltage (100 kV or greater) transmission lines crossed by the ROW
Distance of steep slopes crossed	Derived from seamless Digital Elevation Models (DEMs) obtained from the U.S. Geologic Survey (2020)	Miles of slope greater than 20 percent crossed by the routes

<b>Attachment B. GIS Data Sources</b>		
<b>Siting Criteria</b>	<b>Source</b>	<b>Description</b>
Length of transmission line parallel	PennWell Power Data (2019)	Miles of the route parallel to existing high voltage transmission lines
Length of pipeline parallel	U.S. Department of Transportation National Pipeline Mapping System (2020)	Miles of the route parallel to existing pipelines
Length of road parallel	NADS (2012)	Miles of the route parallel to existing roadways
Oil, gas, and mineral resources	ODNR (2020)	Oil and gas wells, former surface coal mines, coal mines, mine reclamation areas, mineral mining operations within 250 feet from edge of ROW
Wind turbines	USGS (2020)	Wind turbines within 1,000 feet of the centerline
Cell Towers	FCC (2018)	Communication towers within 1,000 feet of the centerline

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**Attachment C: Agency Correspondence**

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# 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

May 5, 2020

Dan Godec  
Stantec  
1500 Lake Shore Drive Suite 100  
Columbus OH 43204-3800

**Re:** 20-339; Lott 138 kV Delivery Point Siting Project

**Project:** The proposed project involves the construction of a new greenfield 138 kV line and switch substation.

**Location:** The proposed project is located in Porter Township, Delaware County, Ohio.

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

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

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

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

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

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

The 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.

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, the rabbitsfoot (*Quadrula cylindrica cylindrica*), a state endangered and federal candidate mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, and the pondhorn (*Unio merus tetralasmus*), a state threatened mussel. This project must not have an impact on freshwater native mussels within the project area. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2020), 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 5 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 (2020) can be found at:

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

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

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

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

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

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

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

Mike Pettegrew  
Environmental Services Administrator (Acting)

**From:** [Finfera, Jennifer](#)  
**To:** [Godec, Daniel](#)  
**Subject:** Re: [EXTERNAL] RE: Request for additional information Lott 138 kV Delivery Point Siting Project, Delaware County, Ohio  
**Date:** Thursday, April 23, 2020 7:40:46 AM

---

Dan,

Your polygon is outside the buffer area for any known threatened or endangered species. However, the area does contain several large blocks of continuous forest habitat. We recommend that the project route minimize disturbance to large forest blocks and that impacts to forest connectivity be limited as much as possible. At a minimum we recommend seasonal clearing to reduce impacts to federally listed bats species.

Once you have determined specific route options we will be able to review the project and determine if seasonal clearing is sufficient or if additional surveys are needed.

Let me know if this provides the information that you need at this time. We look forward to providing more specific comments once preliminary routes are identified.

Sincerely,

Jenny Finfera

---

**From:** Godec, Daniel <Daniel.Godec@stantec.com>  
**Sent:** Wednesday, April 22, 2020 3:37 PM  
**To:** Finfera, Jennifer <jennifer\_finfera@fws.gov>  
**Subject:** [EXTERNAL] RE: Request for additional information Lott 138 kV Delivery Point Siting Project, Delaware County, Ohio

Hi Jenny,

The amount of tree clearing is yet to be determined but tree clearing will be limited as much as possible. We are currently in the process of preparing a routing and siting study report for this project that would evaluate several different alternate routes for this greenfield 138 kV transmission line project. Your response data to this original request will be utilized for the routing and siting report, including avoiding specific T/E species locations or habitats where possible. That's why we submitted a general study area map with our technical assistance request. The alternate routes we evaluate will fall within the overall study area polygon.

Let me know if you have any other questions.

Thanks,

Dan

**Daniel Godec**  
Senior Environmental Project Manager

Direct: 513 842-8200  
Mobile: 513 265-9763  
Fax: 513 842-8250  
[Daniel.Godec@stantec.com](mailto:Daniel.Godec@stantec.com)



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**From:** Finfera, Jennifer <jennifer\_finfera@fws.gov>

**Sent:** Wednesday, April 22, 2020 3:09 PM

**To:** Godec, Daniel <Daniel.Godec@stantec.com>

**Subject:** Request for additional information 138 kV Delivery Point Siting Project, Delaware County, Ohio

How much tree clearing would be required for this project?

Jenny Finfera  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
4625 Morse Rd., Suite 104  
Columbus, Ohio 43230

614-416-8993 ext. 113  
Direct:614-528-9706

**From:** [Ohio, FW3](#)  
**To:** [Godec, Daniel](#)  
**Cc:** [nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us); [Parsons, Kate](#)  
**Subject:** AEP Lott 138 kV Delivery Point Siting Project, Delaware County, Ohio  
**Date:** Tuesday, November 23, 2021 9:41:09 AM  
**Attachments:** [image.png](#)  
[image.png](#)

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TAILS# 03E15000-2020-TA-1277

Dear Mr. Godec,

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

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

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

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

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

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

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

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

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

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

Sincerely,



Patrice Ashfield

Field Office Supervisor

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

---

## **Attachment D: Threatened and Endangered Species**

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Attachment D. Threatened and Endangered Species			
Species Name	Status	Habitat Type	Note
<b>Birds</b>			
American Bittern ( <i>Botaurus lentiginosus</i> )	SE	Nesting American bitterns are very secretive and prefer large undisturbed wetlands that have scattered small pools amongst the dense vegetation. They occasionally occupy bogs, large wet meadows, and dense, shrubby swamps (ODNR 2020).	No suitable habitat was observed within the Study Area. Therefore, impacts to this species are not anticipated.
Lark Sparrow ( <i>Chondestes grammacus</i> )	SE	This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil (ODNR 2020).	Potentially suitable habitat for this species (old field) was observed within portions of the Study Area. However, this species is not known to occur within the Study Area or a one-mile radius of it. Therefore, impacts to this species are possible but not anticipated.
Black-crowned Night Heron ( <i>Nycticorax nycticorax</i> )	ST	These herons are often found roosting in thick vegetation along streams, lakes, and wetlands. They are hardy and sometimes overwinter in favored spots. (ODNR 2020). Eggs are laid in a platform nest in groves of trees near coastal marshes or on marine islands, swamps, marsh vegetation, clumps of grass on dry ground, orchards, and in many other situations. Usually nests with other heron species. (NatureServe 2020).	No suitable habitat or nests were observed within the Study Area. Therefore, impacts to this species are not anticipated.
<b>Insects</b>			
Marsh Bluet ( <i>Enallagma ebrium</i> )	ST	Throughout northern United States and southern Canada, the marsh bluet is usually found in marshes, vegetated ponds, lakeshores, and quiet streams. This species generally is not found in acidic conditions (WDNR 2020).	Potentially suitable habitat for this species (wetlands and streams) was observed within portions of the Study Area. However, this species is not known to occur within the Study Area or a one-mile radius of it. Therefore, impacts to this species are possible but not anticipated.
<b>Plants</b>			
Running Buffalo Clover ( <i>Trifolium stoloniferum</i> )	DL; SE	Mesic habitats with partial to filtered sunlight including woodlands and mowed lawn (USFWS 2007b).	No suitable habitat was observed within the Study Area. Therefore, impacts to this species are not anticipated.
<b>Mammals</b>			
Indiana Bat ( <i>Myotis sodalis</i> )	FE; SE	The Indiana bat is likely distributed over the entire State of Ohio, though not uniformly. This species generally forages in openings and edge habitats within	No suitable winter hibernacula were observed within the Study Area. However, potentially suitable summer habitat was observed

Attachment D. Threatened and Endangered Species			
Species Name	Status	Habitat Type	Note
		upland and floodplain forest, but they also forage over old fields and pastures (Brack et al. 2010). Natural roost structures include trees (live or dead) with exfoliating bark, and exposure to solar radiation. Other important factors for roost trees include relative location to other trees, a permanent water source and foraging areas; Dead trees are preferred as maternity roosts; however, live trees are often used as secondary roosts depending on microclimate conditions (USFWS 2007a; USFWS 2017). Roosts have also occasionally been found to consist of cracks and hollows in trees, utility poles, buildings, and bat boxes. Primarily use caves for hibernacula, although are also known to hibernate in abandoned underground mines (Brack et al. 2010).	(mixed early successional/second growth deciduous forest). AEP intends to avoid areas with potential summer roost habitat to the extent possible and intends to clear forested habitat between October 1 and March 31, as necessary. Therefore, no impacts to this species are anticipated. AEP will determine if any summer tree clearing is necessary in areas containing suitable roost habitat and will proceed accordingly.
Northern Long-eared Bat ( <i>Myotis septentrionalis</i> )	FT; SE	The northern long-eared bat is found throughout Ohio. This species generally forages in forested habitat and openings in forested habitat and utilizes cracks, cavities, and loose bark within live and dead trees, as well as buildings as roosting habitat (Brack et al. 2010; USFWS 2016). The species utilizes caves and abandoned mines as winter hibernacula. Various sized caves are used providing they have a constant temperature, high humidity, and little to no air current (Brack et al. 2010).	No suitable winter hibernacula were observed within the Study Area. However, potentially suitable summer habitat was observed (mixed early successional/second growth deciduous forest). AEP intends to avoid areas with summer roost habitat to the extent possible and intends to clear forested habitat between October 1 and March 31, as necessary. Therefore, no impacts to this species are anticipated. AEP will determine if any summer tree clearing is necessary in areas containing suitable roost habitat and will proceed accordingly.
Little Brown Bat ( <i>Myotis lucifugus</i> )	SE	The little brown bat is found throughout Ohio. This species seems to prefer to forage over water but also forages among trees in rather open areas (Harvey et al. 1999). During summer, it typically inhabits buildings, attics, church belfries, barns and outbuildings, and occasionally more natural habitats such as sloughing bark of a dead tree. During summer, two types of roosts are utilized: day roosts and night roosts. Day roosts are the maternity colony roost, while little brown bats often roost in other areas where they rest and congregate to digest their food in between foraging bouts. In Ohio, this species typically utilizes caves and mines as hibernacula, although at least one hibernaculum was found to be located in an attic of an old building (Brack et al. 2010).	No suitable winter hibernacula were observed within the Study Area. However, potentially suitable summer habitat was observed (mixed early successional/second growth deciduous forest). AEP intends to avoid areas with summer roost habitat to the extent possible and intends to clear forested habitat between October 1 and March 31, as necessary. Therefore, no impacts to this species are anticipated. AEP will determine if any summer tree clearing is necessary in areas containing suitable roost habitat and will proceed accordingly.

Attachment D. Threatened and Endangered Species			
Species Name	Status	Habitat Type	Note
Tri-colored Bat ( <i>Perimyotis subflavus</i> )	PE; SE	The tricolored bat is found throughout Ohio. This species has been found to forage above and within a variety of habitats, including woodlands, agricultural fields, grassy areas, and over streamside vegetation (Sparks et al. 2011). Maternity colonies have often been found within clusters of dead leaves, hanging in trees. Maternity colonies have also been found in or on buildings. Little is known of male tri-colored bats in summer, but it is thought that they are probably solitary and spend their days in similar situations, as well as crevices, caves and mines (Brack et al. 2010). In Ohio, this species typically utilizes caves and mines as hibernacula, utilizing a variety of situations, including very cold areas near cave entrances to deeper passages that seem to be too warm for other species of bats (Brack et al. 2010).	No suitable winter hibernacula were observed within the Study Area. However, potentially suitable summer habitat was observed (mixed early successional/second growth deciduous forest). AEP intends to avoid areas with summer roost habitat to the extent possible and intends to clear forested habitat between October 1 and March 31, as necessary. Therefore, no impacts to this species are anticipated. AEP will determine if any summer tree clearing is necessary in areas containing suitable roost habitat and will proceed accordingly.
<b>Mussels</b>			
Snuffbox ( <i>Epioblasma triquetra</i> )	FE; SE	Occurs in medium-sized streams to large rivers, generally on mud, rocky, gravel, or sand substrates in flowing water. Often deeply buried in substrate and overlooked by collectors (NatureServe 2021). Snuffbox is commonly found buried in the substrate. It is found in a wide range of particle sized substrates; however, swift shallow riffles with sand and gravel are where it is typically found (Parmalee and Bogan 1998; Watters et al. 2009).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.
Clubshell ( <i>Pleurobema clava</i> )	FE; SE	The clubshell is found in small to medium rivers, but occasionally found in large rivers, especially those having large shoal areas. It is generally found in clean, coarse sand and gravel in runs, often just downstream of a riffle and cannot tolerate mud or slackwater conditions (USFWS 1994). (Badra and Goforth 2001) found the clubshell in gravel/sand substrate, runs having laminar flow (0.06-0.25 m/sec) within small to medium sized streams (NatureServe 2021).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.
Rabbitsfoot ( <i>Quadrula cylindrica</i> )	FT; SE	Typical habitat for this species is small to medium rivers with moderate to swift currents, and in smaller streams it inhabits bars or gravel and cobble close to the fast current. Rabbitsfoot are also found in medium to large rivers in sand and gravel (NatureServe 2021).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.

Attachment D. Threatened and Endangered Species			
Species Name	Status	Habitat Type	Note
Rayed Bean ( <i>Villosa fabalis</i> )	FE; SE	Habitat includes gravel or sandy substrate, especially in areas of thick roots of aquatic plants, increase substrate stability (NatureServe 2021; Parmalee and Bogan 1998). Rayed bean can be associated with shoal or riffle areas, and in shallow, wave-washed areas of glacial lakes. It is generally found in smaller, headwater creeks, but sometimes in larger rivers and open waterbodies. It can occur in shallow riffles or in lakes with water depths up to four feet. It has been found in riffles, generally in vegetation, and deeply buried in sand and gravel bound together by roots (Parmalee and Bogan 1998).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.
Black Sandshell ( <i>Ligumia recta</i> )	ST	Typically found in medium-sized to large rivers in locations with strong current and substrates of coarse sand and gravel with cobbles in water depths from several inches to six feet or more (NatureServe 2021).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.
Pondhorn ( <i>Uniomerus tetralasmus</i> )	ST	This species typically inhabits the quiet or slow-moving, shallow waters of sloughs, borrow pits, ponds, ditches, and meandering streams. It is tolerant of poor water conditions and can be found well buried in a substrate of fine silt and/or mud. It has been known to survive for extended periods of time when a pond or slough has temporarily dried up by burying itself deep into the substrate (NatureServe 2021).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.
Ohio Pigtoe ( <i>Pleurobema cordatum</i> )	SE	Occurs in medium to large rivers directly above riffles of gravel, cobble, and boulder, but occasionally in muddy or sandy or gravel habitats at great depths (NatureServe 2021).	No suitable habitat was observed within the Study Area and no in-water work in perennial streams is proposed by AEP. Therefore, impacts to this species are not anticipated.

Key

AEP = AEP Ohio Transmission Company, Inc., FE = Federally Listed Endangered; FT = Federally Listed Threatened; PE = Proposed Federally Endangered; DL = Federally De-listed; SE = State-listed Endangered; ST = State-listed Threatened

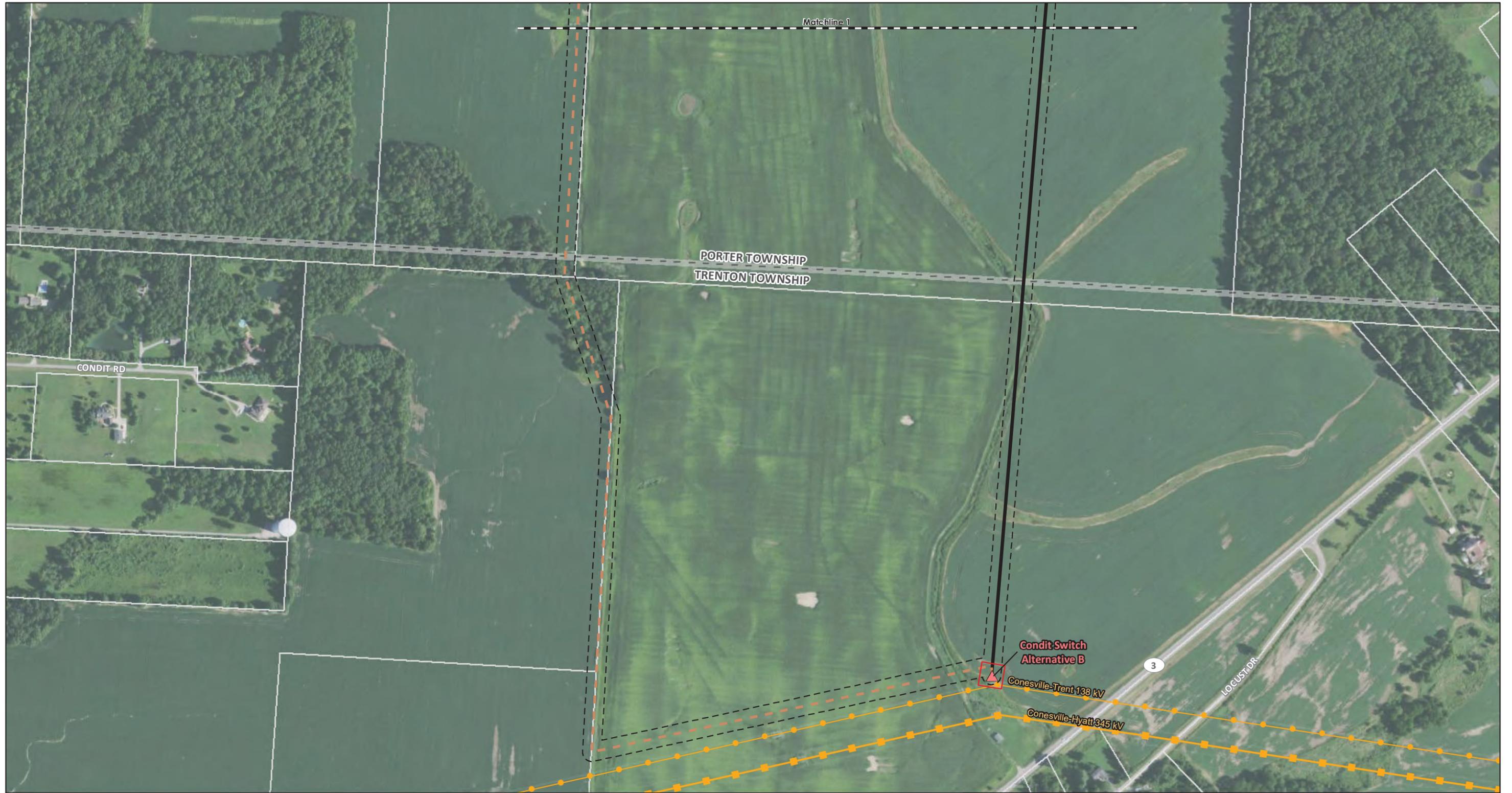
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**Attachment E: Aerial Mapbook**

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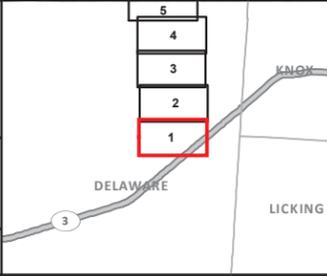


- Existing Substation
- Preliminary Switch Location
- Preferred Route (Route B)
- Alternate Route (Route C)
- Proposed Switch Site
- Proposed ROW (80')
- Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Township Boundary

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), Delaware County (2020), NAIP (2019)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023



**Aerial Mapbook of Preferred Route and Alternate Route**

Lott 138 kV Transmission Line Project

Page 1 of 5



Existing Substation	Existing Transmission Line (115 kV to 230 kV)
Preliminary Switch Location	Existing Transmission Line (345 kV +)
Preferred Route (Route B)	Township Boundary
Alternate Route (Route C)	Proposed Switch Site
Proposed ROW (80')	Parcel Boundary

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), Delaware County (2020), NAIP (2019)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023



**Aerial Mapbook of Preferred Route and Alternate Route**

Lott 138 kV Transmission Line Project

0 200 400  
Feet

Page 2 of 5



- Existing Substation
- Preliminary Switch Location
- Preferred Route (Route B)
- Alternate Route (Route C)
- Proposed Switch Site
- Proposed ROW (80')
- Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Township Boundary

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), Delaware County (2020), NAIP (2019)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023

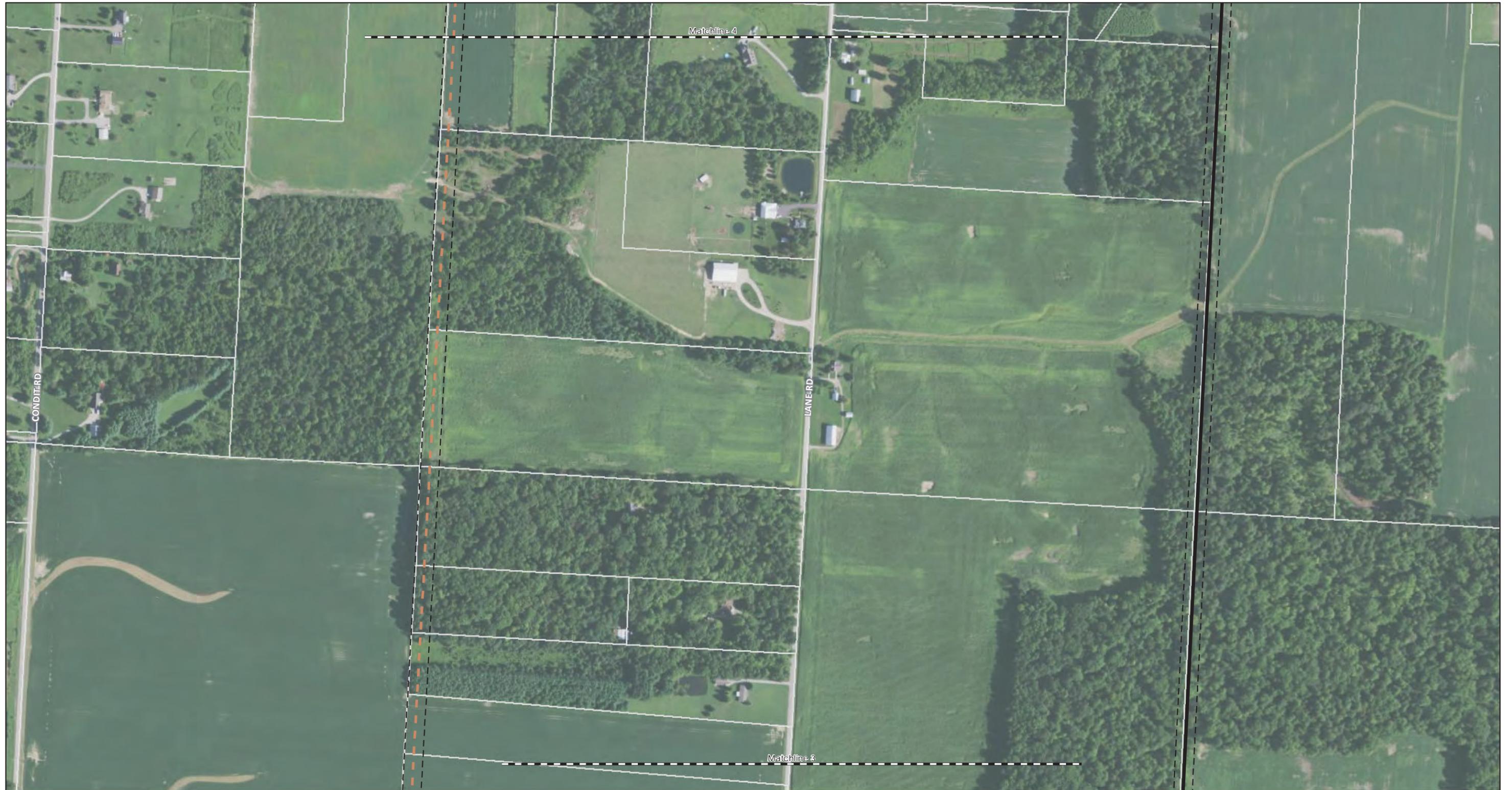


**Aerial Mapbook of Preferred Route and Alternate Route**



Lott 138 kV Transmission Line Project

0 200 400 Feet

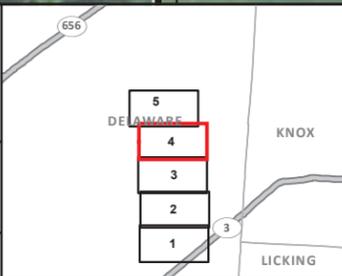


▲ Existing Substation	Existing Transmission Line (115 kV to 230 kV)
▲ Preliminary Switch Location	Existing Transmission Line (345 kV +)
Preferred Route (Route B)	Township Boundary
Alternate Route (Route C)	Proposed Switch Site
Proposed ROW (80')	Parcel Boundary

Data Sources: AEP (2020), Stantec (2020), OGRIP (2018), Delaware County (2020), NAIP (2019)

Coordinate System: State Plane Ohio North NAD 83

February 24, 2023



**Aerial Mapbook of Preferred Route and Alternate Route**

Lott 138 kV Transmission Line Project

0 200 400 Feet

Page 4 of 5



- Existing Substation
- Preliminary Switch Location
- Preferred Route (Route B)
- Alternate Route (Route C)
- Proposed Switch Site
- Proposed ROW (80')
- Parcel Boundary
- Existing Transmission Line (115 kV to 230 kV)
- Existing Transmission Line (345 kV +)
- Township Boundary

Data Sources: AEP (2020),  
Stantec (2020), OGRIP (2018),  
Delaware County (2020),  
NAIP (2019)

Coordinate System:  
State Plane Ohio North  
NAD 83



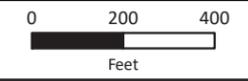
February 24, 2023



### Aerial Mapbook of Preferred Route and Alternate Route



Lott 138 kV  
Transmission Line Project



APPENDICES

**APPENDIX 5-1 LONG TERM FORECAST REPORT OF OHIO  
POWER COMPANY**

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

1.	<b>LINE NAME AND NUMBER:</b>	Lott Extension (Centerburg - Trent) (s2283) TP2019211
2.	<b>POINTS OF ORIGIN AND TERMINATION</b>	Condit Sw , Consol Coop's Lott Station INTERMEDIATE STATION -
3.	<b>RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS</b>	3.75 mi / 100 ft / 1 circuit (just the new extension mileage)
4.	<b>VOLTAGE: DESIGN / OPERATE</b>	138 kV/ 138 kV
5.	<b>APPLICATION FOR CERTIFICATE:</b>	2022
6.	<b>CONSTRUCTION:</b>	2023-2024
7.	<b>CAPITAL INVESTMENT:</b>	\$9.8M
8.	<b>PLANNED SUBSTATION:</b>	N/A
9.	<b>SUPPORTING STRUCTURES:</b>	Steel
10.	<b>PARTICIPATION WITH OTHER UTILITIES</b>	N/A
11.	<b>PURPOSE OF THE PLANNED TRANSMISSION LINE</b>	New 138 kV extension to serve co-op transmission delivery point
12.	<b>CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION</b>	Unable to provide requested service to customer
13.	<b>MISCELLANEOUS:</b>	

APPENDICES

**APPENDIX 6-1 PUBLIC OFFICIALS CONTACTED AND  
OFFICIALS TO BE SERVED A COPY OF CERTIFIED  
APPLICATION**

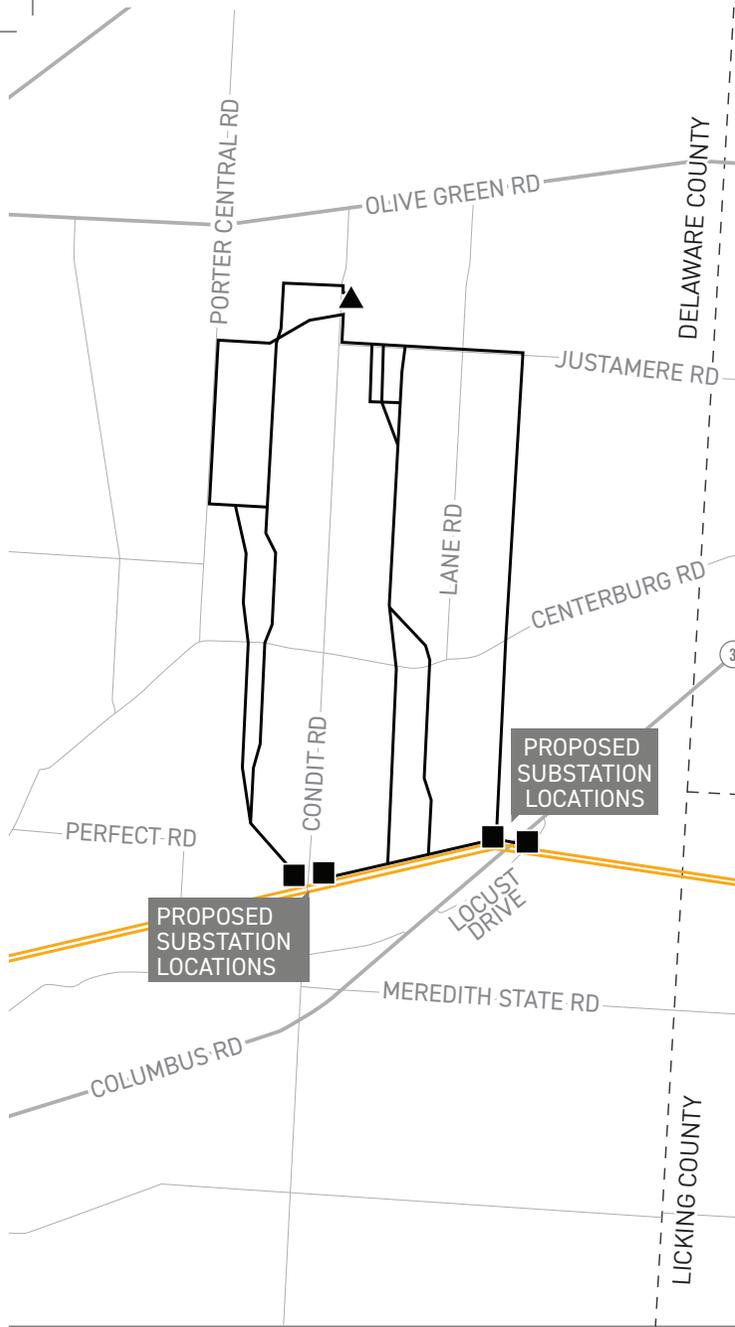
**Appendix 6-1**  
**Lott 138 kV Transmission Line Project**  
**Public Officials Contacted and Officials to be Served a Copy of Certified**  
**Application**

OFFICE	ATTENTION	ADDRESSEE	ADDRESS	CITY	STATE	ZIP
County Commissioner	Jeff Benton	Mr. Benton	101 N. Sandusky St.	Delaware	OH	43015
County Commissioner	Barb Lewis	Ms. Lewis	101 N. Sandusky St.	Delaware	OH	43015
County Commissioner	Gary Merrell	Mr. Merrell	101 N. Sandusky St.	Delaware	OH	43015
County Engineer	Chris Bauserman, PE, PS	Mr. Bauserman	50 Channing St.	Delaware	OH	43015
Delaware County Soil and Water Conservation District	Scott Stephens, District Administrator	Mr. Stephens	557-A Sunbury Rd.	Delaware	OH	43015
Township Trustee	Eddy Ambrose	Mr. Ambrose	12826 McKay Street	Sunbury	OH	43074
Township Trustee	Bob Ryan	Mr Ryan	12826 McKay Street	Sunbury	OH	43074
Township Trustee	Ed Snodgrass	Mr. Snodgrass	12826 McKay Street	Sunbury	OH	43074
Fiscal Officer	Mark Mazzon	Mr. Mazzon	12826 McKay Street	Sunbury	OH	43074
Township Trustee	Richard Fisher	Mr. Fisher	15495 Hartford Rd.	Sunbury	OH	43074
Township Trustee	Kevin Justice	Mr. Justice	15495 Hartford Rd.	Sunbury	OH	43074
Township Trustee	Mark Almendinger	Mr. Almendinger	15495 Hartford Rd.	Sunbury	OH	43074
Fiscal Officer	Cynthia Walton	Ms. Walton	15495 Hartford Rd.	Sunbury	OH	43074

APPENDICES

**APPENDIX 6-2 PUBLIC OPEN HOUSES INFORMATIONAL  
MATERIALS**





## IMPORTANT MESSAGE ABOUT YOUR PROPERTY

Dear Neighbor,

You are receiving this letter because public records show you own property or live in the area where AEP Ohio representatives plan to upgrade the local power grid.

The Lott 138-kV Transmission Line Project involves building approximately 4 miles of 138-kilovolt (kV) electric transmission line and one substation in Porter and Trenton townships in Delaware County.

We are writing to request feedback on possible locations for the substation and possible route options to build the 4-mile transmission line. Your feedback is important to us and helps our team minimize impact on the community and environment.

As a result of the COVID-19 pandemic and the social distancing recommendations made by the Centers for Disease Control and Prevention (CDC), we invite you to share your feedback online by visiting our virtual open house at [AEPOhio.com/Lott](http://AEPOhio.com/Lott). On this website you can access project information, view an interactive map and submit comments through a "Contact Us" link. If you prefer, you may complete and return the attached, removable comment card and mail it back to us. Please share your feedback by Monday, October 26.

When sharing your input please feel free to include information about your property such as:

- Historically significant buildings or landmarks such as cemeteries
- Natural features such as wetlands or springs
- Future plans for your property

These improvements strengthen the local power grid by reducing the likelihood of power outages and speeding recovery of service when outages occur. Feel free to contact me if you have any questions.

You can expect to learn about next steps from Kellis Cunningham of Contract Land Staff, LLC, the right-of-way agent representing AEP Ohio on this project. Kellis plans to discuss upcoming field activities. You may contact Kellis at (972) 804-9528 or [kellis.cunningham@contractlandstaff.com](mailto:kellis.cunningham@contractlandstaff.com).

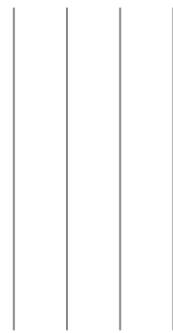
Sincerely,

**MAGGIE BEGGS**

Project Outreach Specialist  
 (380) 205-5178  
[mrbeeggs@aep.com](mailto:mrbeeggs@aep.com)  
[AEPOhio.com/Lott](http://AEPOhio.com/Lott)



**ATTN: Maggie Beggs**  
 Project Outreach Specialist  
 8600 Smiths Mill Rd.  
 New Albany, OH 43054



### LOTT 138-KV TRANSMISSION LINE PROJECT

- ▲ EXISTING SUBSTATION
- PROPOSED SUBSTATION
- EXISTING TRANSMISSION LINE
- STUDY SEGMENTS





An AEP Company

October 19, 2022

**ATTN: IMPORTANT INFORMATION ABOUT YOUR PROPERTY**

«Owner\_Name»

«ADDRESS»

«CITY», «STATE» «ZIP»

RE: Lott 138-kV Transmission Line Project Update & Open House Invitation

To be filed as Lott 138 kV Transmission Line Project

Case No. 22-0940-EL-BTX

Dear Neighbor,

You are receiving this letter because public records indicate you own property or live in the area that is part of AEP Ohio's Lott 138-kV Transmission Line Project. We are writing to invite you to a project open house and update you on the next steps in the project.

Company representatives announced the Lott 138-kV Transmission Line Project in fall 2020. The project involves building about 4 miles of power line and a switch pole north of Locust Road in Porter and Trenton townships, Delaware County. The proposed powerline provides an enhanced power source to Consolidated Cooperative's Lott Substation from AEP Ohio's Centerburg – Trent 138-kilovolt (kV) transmission line. By connecting a 138-kV power line to the Lott Substation, Consolidated Cooperative can retire an existing 34.5-kV power line and better serve area customers.

Since the announcement the following events have taken place, AEP Ohio representatives:

- Hosted a virtual open house to gather feedback on route options in fall 2020
- Announced a proposed final line route in spring 2021
- Determined the need for additional field survey work in spring 2022
- Developed an additional route for consideration in summer 2022

**We are hosting an in-person open house and virtual open house and invite you to learn more and share your input on both route alternatives for the 4 miles of 138-kV power line.** Please join us from **5:30 to 7:30 p.m.** on **Wednesday, November 16**, at **Centerburg High School Cafeteria** located at **3782 Columbus Road in Centerburg**. You can view detailed maps and talk with team members about the project. There is no formal presentation, so you can arrive at any time during the event.

At AEP Ohio, safety is our first priority. Face masks and hand sanitizer will be available at the open house. If you are feeling unwell or experiencing COVID-19 symptoms, we ask that you stay home and visit the **VIRTUAL OPEN HOUSE at [AEPOhio.com/Lott](https://www.aepohio.com/Lott)** to access information, view an interactive map, enter our virtual open house and submit comments through the project website. You may also complete the enclosed comment card and mail it back to us.

Our team plans to use your input and additional field work to determine a power line route that minimizes impact on the community and environment. **Please share your input by Wednesday, November 30.** We welcome and encourage your feedback about this project.

When sharing your input please feel free to include information about your property, such as:

- Historically significant buildings or landmarks such as cemeteries



An **AEP** Company

- Natural features such as wetlands or springs
- Future plans for your property

To construct the project, company officials must obtain the approval of the Ohio Power Siting Board (OPSB). Following the public input period, the AEP Ohio project team prepares and submits an application to the OPSB that includes information on both a preferred and alternate route for the 4 miles of proposed power line and switch pole north of Locust Road. Each proposed route must be designated as a preferred or alternate route and must be a viable alternative that can be constructed. The company plans to file the Lott 138 kV Transmission Line Project, Case No. 22-0940-EL-BTX in early 2023.

The OPSB is legally obligated to review the application and, if certain legal criteria are met, it may approve the project. OPSB approval is obtained through the issuance of a Certificate of Environmental Compatibility and Public Need. For more information on the OPSB, its composition and the process it follows in reviewing the application for the project, please visit [www.opsb.ohio.gov](http://www.opsb.ohio.gov). You can also contact OPSB staff via e-mail at [contactopsb@puco.ohio.gov](mailto:contactopsb@puco.ohio.gov), by phone at 866-270-6722 or mailing correspondence to 180 East Broad Street, 11<sup>th</sup> Floor, Columbus, OH 43215.

A separate public hearing on the project will be scheduled in the future by the OPSB. You may request notice of the public hearing using any of the communication methods mentioned earlier in this letter. You can file a petition to intervene in the OPSB process with the siting board up to 30 days after the public hearing notice. The OPSB determines the final line route.

Please review the enclosed factsheet for more information. Feel free to contact me if you have any questions.

Sincerely,

*Meghan Blankenship*

Meghan Blankenship  
Project Outreach Specialist  
380-784-0556  
[mdblankenship@aep.com](mailto:mdblankenship@aep.com)

# LOTT

## 138-KV TRANSMISSION LINE PROJECT



An AEP Company

BOUNDLESS ENERGY™

AEP Ohio officials plan to strengthen the electric transmission system in Delaware County. The project involves building approximately 4 miles of 138-kilovolt (kV) transmission line and install a new switch pole to help improve electric reliability for customers.

### WHAT

- Building about 4 miles of power line and a switch pole north of Locust Drive

\*This project requires Ohio Power Siting Board (OPSB) approval

### WHY

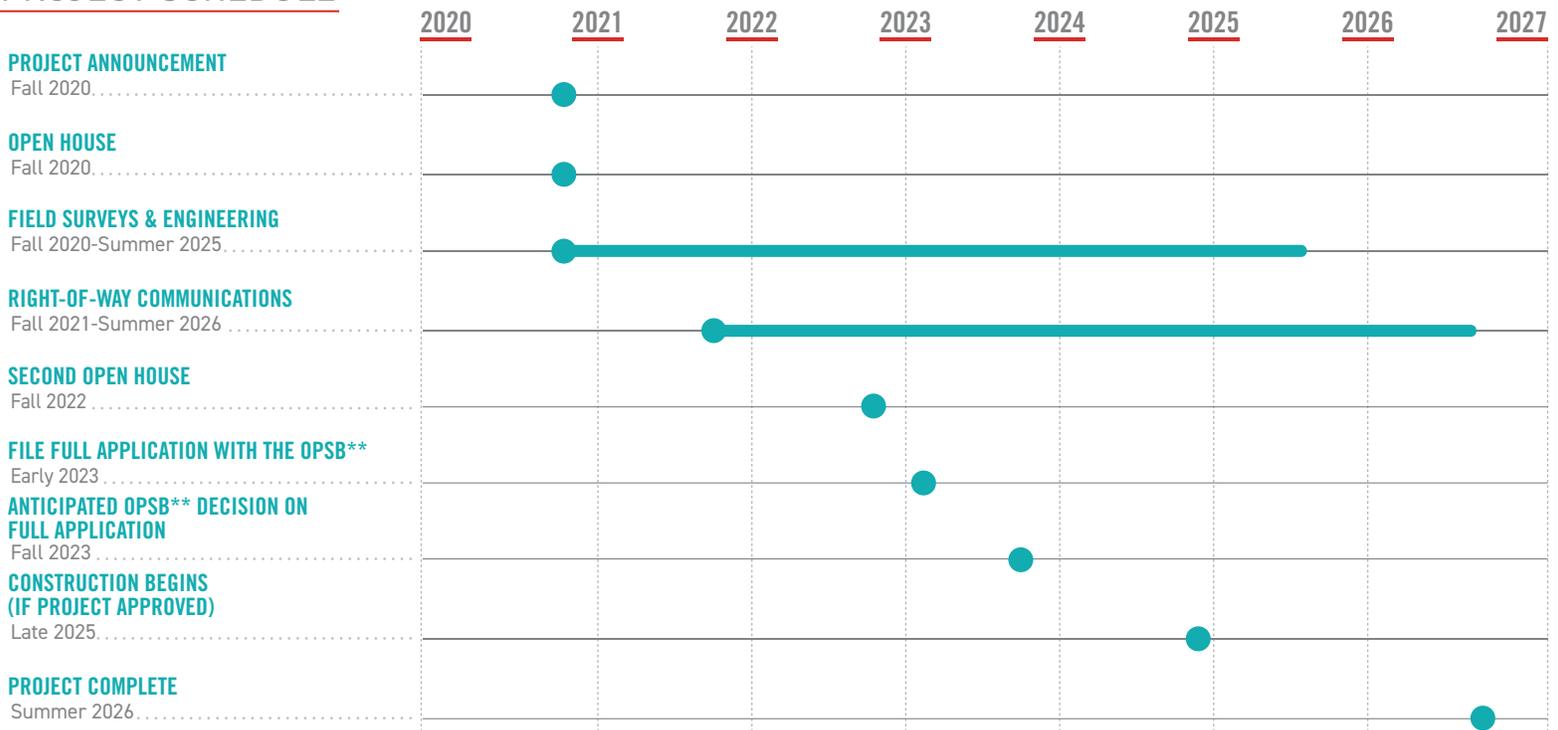
The proposed powerline provides an enhanced power source to Consolidated Cooperative's Lott Substation from AEP Ohio's Centerburg - Trent 138-kilovolt (kV) transmission line. By connecting a 138-kV power line to the Lott Substation, Consolidated Cooperative can retire an existing 34.5-kV power line and better serve area customers.

### WHERE

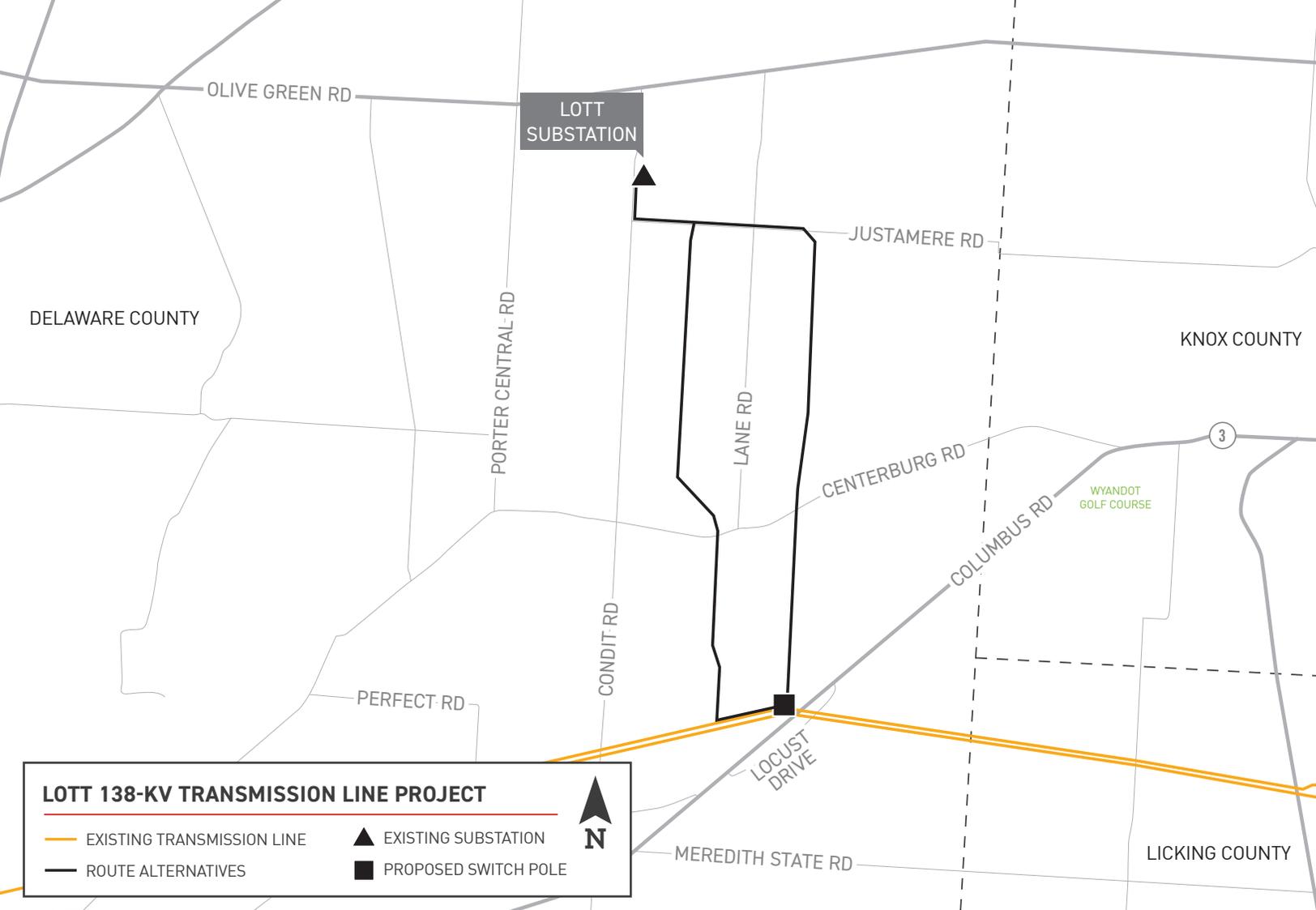
The project area is located in Porter and Trenton townships in Delaware County.



## PROJECT SCHEDULE



\*\*Timeline subject to change. \*OPSB: Ohio Power Siting Board



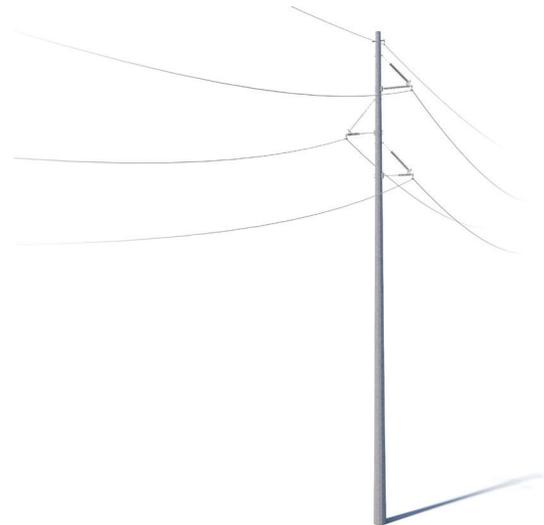
## TYPICAL STRUCTURES

The project involves the use of single, steel poles.

Structure Height: **Approximately 80 -100 feet\***

Right-of-Way Width: **Approximately 100 feet\***

\*Exact structure, height and right-of-way requirements may vary



**AEP OHIO VALUES YOUR INPUT ABOUT THIS PROJECT. PLEASE SEND COMMENTS AND QUESTIONS TO:**

✉ AEP Ohio  
c/o Meghan Blankenship  
8500 Smiths Mill Road  
New Albany, OH 43054

✉ [mdblankenship@aep.com](mailto:mdblankenship@aep.com)  
☎ (304) 784-0556  
➡ [AEPOhio.com/Lott](http://AEPOhio.com/Lott)



## Giving

From page 1

hope they add a bit of joy to their holidays.

Throughout Delaware City Schools, students are collecting different items for the food drive: corn, peas, green beans, macaroni and cheese, and cake mix.

Wadkins said the organizers of the event have had to contend with rising costs, but the addition of new partners have ensured that the meal kits will still be fully stocked and distributed.

"This year has been interesting ... The cost of turkeys went up, but we were able to make new contacts and partnerships with this program," Wadkins said.

Buckeye Valley Local Schools is one of the event's new partners this year.

"All of their schools participated this year and that's new," Wadkins said. "They really stepped up."

Wadkins said three Orlentangy high schools also participated this year, including Orlentangy Liberty High School, which donated \$2,000 of cereal to the event.

Performance Chrysler Jeep Dodge Ram Delaware also made a \$500 donation and has been showing up with food donations, Wadkins added. Additionally, she said the City of Delaware Engineer Department and the Delaware County Board of Elections also collected donations for the event this year.

On Monday, the Delaware Eagles Post #376 made a \$2,000 donation, which is four times the post's usual \$500 dona-

tion.

"It's amazing!" Wadkins said. "I'm always so moved by the community effort this takes and how quickly people jump at the chance to make this feasible. We started with 50 turkeys and ramen noodles, and by letting other agencies and schools participate, we've been able to grow this thing and reach those who are having food security problems."

The food will be distributed from 2 to 6 p.m. or while supplies last on Tuesday, Nov. 22, at the Byxbe Campus (formerly the Delaware Area Career Center North Campus) located at 1610 State Route 521, Delaware.

"It's great to be part of the food collection but it really is moving when you pack that meal into a vehicle and you know that that family is going to be fed for a holiday meal," Wadkins said. "This year is going to be exponentially more expensive (for families) than last year. You add \$2 to everything that hits the Thanksgiving table, that's a lot. We couldn't do this without all our partners. What that turns into is that we've got a lot of money that we're able to use to buy things for the pantry bags."

Wadkins said the majority of the food is being organized and packed this week, but she added interested parties can still get involved by contacting her at kwadkins@co.delaware.oh.us to find out what needs remain.

"We're starting to get final counts of items we need," she said. "Every item we get donated is one less item we have to purchase. It's mass chaos every year, but every year, it comes together and it's just amazing. Being able to share that with as many people as possible is just amazing."

## HelpLine

From page 1

search Eventbrite for the HelpLine Guardians for Good event. To get a head start on your Giving Tuesday donation, text helpline50 to 41444. Giving will sustain HelpLine's ability to provide crisis support for those experiencing mental health emergencies, suicidal ideation, sexual assault, or basic need disrupt-

tions.

This year's sponsors include Carlile Patchen & Murphy Attorneys at Law, Skip and Linda Weiler Fund, Delaware County Foundation, Delaware African American Heritage Council and Bokes Creek Farmstead.

Those in need of support, information, or a referral to a health or human service can contact HelpLine on its free, confidential 24-hour line at 2-1-1, 1-800-684-2324 or text helpline to 898211.

## DCS

From page 1

supervisor; and Ashlie Rodeola, an EMIS coordinator at Willis.

The board also approved a large number of supplemental contracts for positions such as club advisors and sports coaches.

Additionally, the board approved a \$58,650 change order for the construction at Woodward Elementary for additional plumbing infrastructure. The board will meet next at 6 p.m. Dec. 14.

# MENARDS®

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# NOTICE OF PUBLIC INFORMATION MEETING FOR PROPOSED MAJOR UTILITY FACILITY

AEP Ohio Schedules Open House to Discuss Proposed Transmission Line Project in Delaware County.

AEP Ohio and Ohio Power Company representatives invite residents of Delaware County to attend a public open house regarding a proposed transmission line in Porter and Trenton townships.

Company representatives announced the Lott 138-kV Transmission Line Project in fall 2020. The project involves building about 4 miles of power line and a switch pole north of Locust Drive in Porter and Trenton townships, Delaware County. The proposed power line provides an enhanced power source to Consolidated Cooperative's Lott Substation from AEP Ohio's Centerburg - Trent 138-kilovolt (kV) transmission line. By connecting a 138-kV powerline to the Lott Substation, Consolidated Cooperative can retire an existing 34.5-kV power line and better serve area customers.

To learn more about the Lott 138-kV Transmission Line Project, please join us from 5:30 p.m. to 7:30 p.m. on Wednesday, November 16, at Centerburg High School Cafeteria located at 3782 Columbus Road in Centerburg. Visitors can view detailed maps and talk with team members about the project. There is no formal presentation, so you can arrive at any time during the event.

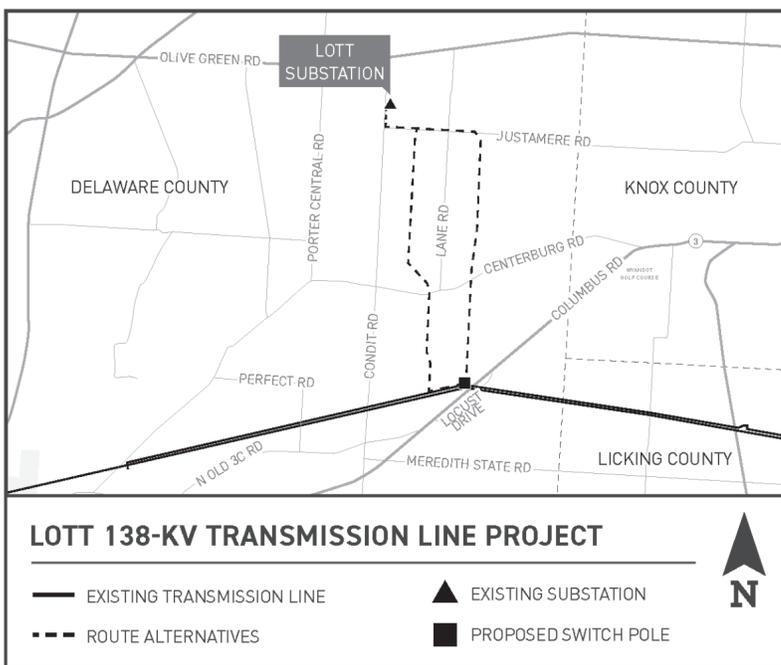
At AEP Ohio, safety is our first priority. Face masks and hand sanitizer will be available at the open house. If you are feeling unwell or experiencing COVID-19 symptoms, we ask that you stay home and visit the VIRTUAL OPEN HOUSE at [AEPOhio.com/Lott](https://aepohio.com/Lott) to access information, view an interactive map, enter our virtual open house and submit comments through the project website.

AEP Ohio representatives expect to file its application for a Certificate of Environmental Compatibility and Public Need for the project with the state of Ohio Power Siting Board (OPSB) in early 2023. This application has been assigned Case No. 22-0940-EL-BTX.

The OPSB is legally obligated to review the application and, if certain legal criteria are met, it may approve the project. The AEP Ohio project team prepares and submits an application to the OPSB that includes information on both a preferred and alternate route for the 4 miles of proposed power line and switch pole north of Locust Drive. Each proposed route must be designated as a preferred or alternate route and must be a viable alternative that can be constructed. The accompanying concept map depicts the two alternative routes the company plans to submit to the OPSB. Please use this map as a general guide due to its reduced scale and limited detail. If the application is approved, construction of the transmission line will begin summer 2023.

Please visit [AEPOhio.com/Lott](https://aepohio.com/Lott) for more information. The public can also ask questions or make comments about the project by calling 380-784-0556 or sending an email inquiry to [mdblankenship@aep.com](mailto:mdblankenship@aep.com). Mail inquiries may be sent to the following address:

AEP Ohio  
 Attention: Meghan Blakenship  
 8500 Smiths Mill Road  
 New Albany, Ohio 43054





An **AEP** Company

January 8, 2023

«Owner\_Name»

«ADDRESS»

«CITY», «STATE» «ZIP»

RE: Lott 138-kV Transmission Line Project Update & Open House Invitation  
To be filed as Lott 138 kV Transmission Line Project  
Case No. 22-0940-EL-BTX

Dear Neighbor,

You are receiving this letter because public records indicate you own property or live in the area that is part of AEP Ohio's Lott 138-kV Transmission Line Project. We are writing to invite you to a project open house and update you on the next steps in the project.

Company representatives announced the Lott 138-kV Transmission Line Project in fall 2020 and held an open house in November. The project involves building about 4 miles of power line and a switch pole north of Locust Drive in Porter and Trenton townships, Delaware County. The proposed power line provides an enhanced power source to Consolidated Cooperative's Lott Substation from AEP Ohio's Centerburg – Trent 138-kilovolt (kV) transmission line. By connecting a 138-kV power line to the Lott Substation, Consolidated Cooperative can better serve area customers.

After reviewing community feedback following our open house in November, we wanted to invite you to an in-person open house to learn more about our preferred and alternate routes. Please join us from **5:30 to 7:30 p.m. on Wednesday, February 1**, at **Centerburg High School Cafeteria** located at **3782 Columbus Road in Centerburg**. You can view detailed maps and talk with team members about the project. There is no formal presentation, so you can arrive at any time during the event.

At AEP Ohio, safety is our first priority. Face masks and hand sanitizer will be available at the open house. If you are feeling unwell or experiencing COVID-19 symptoms, we ask that you stay home and visit the **VIRTUAL OPEN HOUSE at [AEPOhio.com/Lott](https://www.aepohio.com/Lott)** to access information, view an interactive map, enter our virtual open house and submit comments through the project website. You may also complete the enclosed comment card and mail it back to us.

**In the event of inclement weather, please visit the project website for updated information or cancellations.**

Our team plans to use your input and additional field work to determine a power line route that minimizes impact on the community and environment. **Please share your input by Friday, February 10.** We welcome and encourage your feedback about this project.

When sharing your input please feel free to include information about your property, such as:

- Historically significant buildings or landmarks such as cemeteries
- Natural features such as wetlands or springs
- Future plans for your property

To construct the project, company officials must obtain the approval of the Ohio Power Siting Board (OPSB). Following the public input period, the AEP Ohio project team prepares and submits an application to the OPSB that includes information on both a preferred and alternate route for the 4 miles of proposed power line and switch pole north of Locust Road. Each proposed route must be designated as a preferred or alternate route and must be a viable



An **AEP** Company

alternative that can be constructed. The company plans to file the Lott 138 kV Transmission Line Project, Case No. 22-0940-EL-BTX in February 2023.

The OPSB is legally obligated to review the application and, if certain legal criteria are met, it may approve the project. OPSB approval is obtained through the issuance of a Certificate of Environmental Compatibility and Public Need. For more information on the OPSB, its composition and the process it follows in reviewing the application for the project, please visit [www.opsb.ohio.gov](http://www.opsb.ohio.gov). You can also contact OPSB staff via e-mail at [contactopsb@puco.ohio.gov](mailto:contactopsb@puco.ohio.gov), by phone at 866-270-6722 or mailing correspondence to 180 East Broad Street, 11<sup>th</sup> Floor, Columbus, OH 43215.

A separate public hearing on the project will be scheduled in the future by the OPSB. You may request notice of the public hearing using any of the communication methods mentioned earlier in this letter. You can file a petition to intervene in the OPSB process with the siting board up to 30 days after the public hearing notice. The OPSB determines the final line route.

Please review the enclosed factsheet for more information. Feel free to contact me if you have any questions.

Sincerely,

*Meghan Blankenship*

Meghan Blankenship  
Project Outreach Specialist  
304-784-0556  
mdblankenship@aep.com

# LOTT

## 138-KV TRANSMISSION LINE PROJECT



An AEP Company

BOUNDLESS ENERGY™

AEP Ohio officials plan to strengthen the electric transmission system in Delaware County. The project involves building approximately 4 miles of 138-kilovolt (kV) transmission line and installing a new switch pole to help improve electric reliability for customers.

### WHAT

- Building about 4 miles of power line and a switch pole north of Locust Drive

\*This project requires Ohio Power Siting Board (OPSB) approval

### WHY

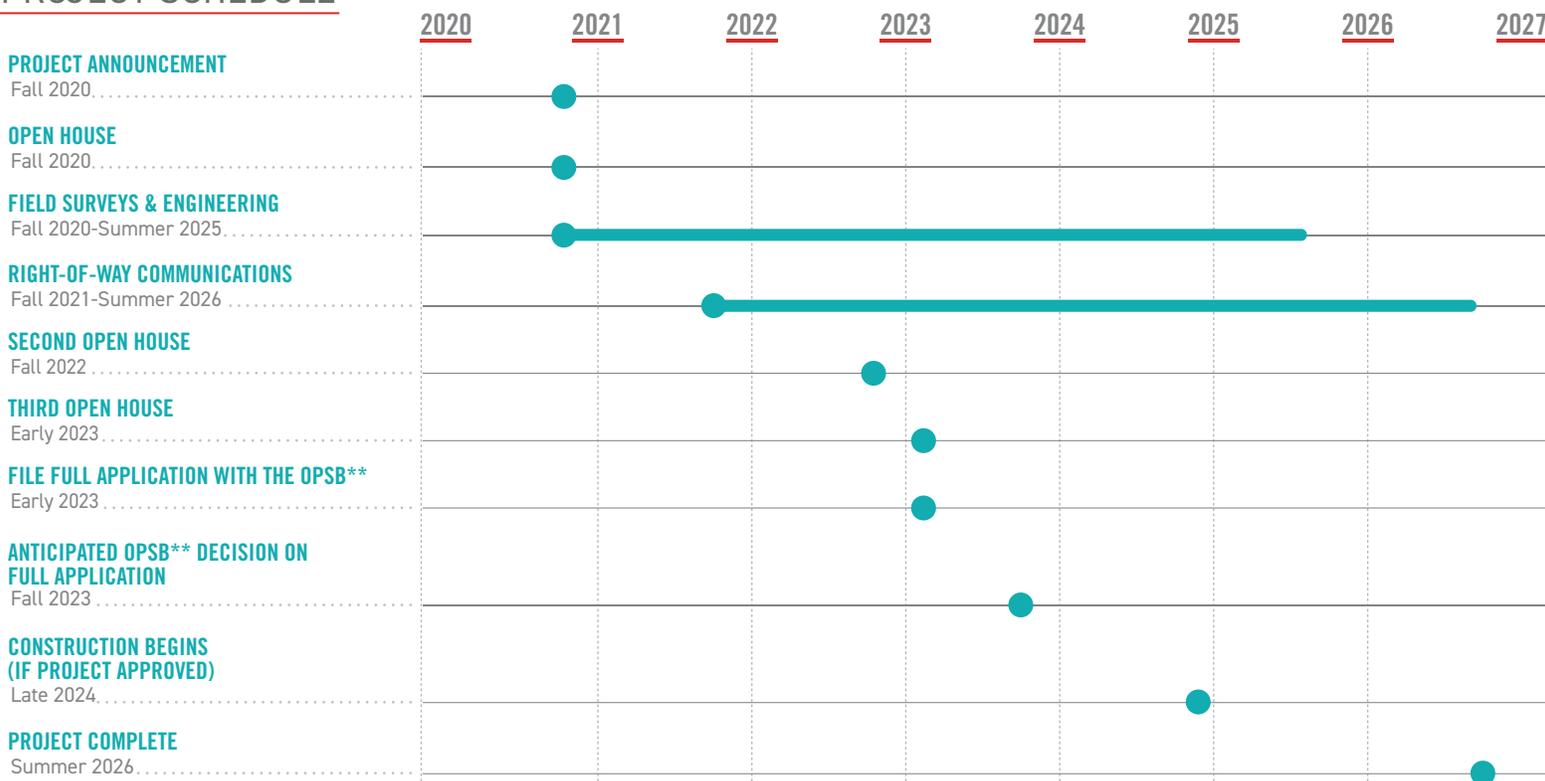
The proposed powerline provides an enhanced power source to Consolidated Cooperative's Lott Substation from AEP Ohio's Centerburg – Trent 138-kilovolt (kV) transmission line. The existing 34.5-kV power line has experienced nearly 5 million customer minutes of interruption since 2013. By connecting a 138-kV power line to the Lott Substation, Consolidated Cooperative can better serve area customers.

### WHERE

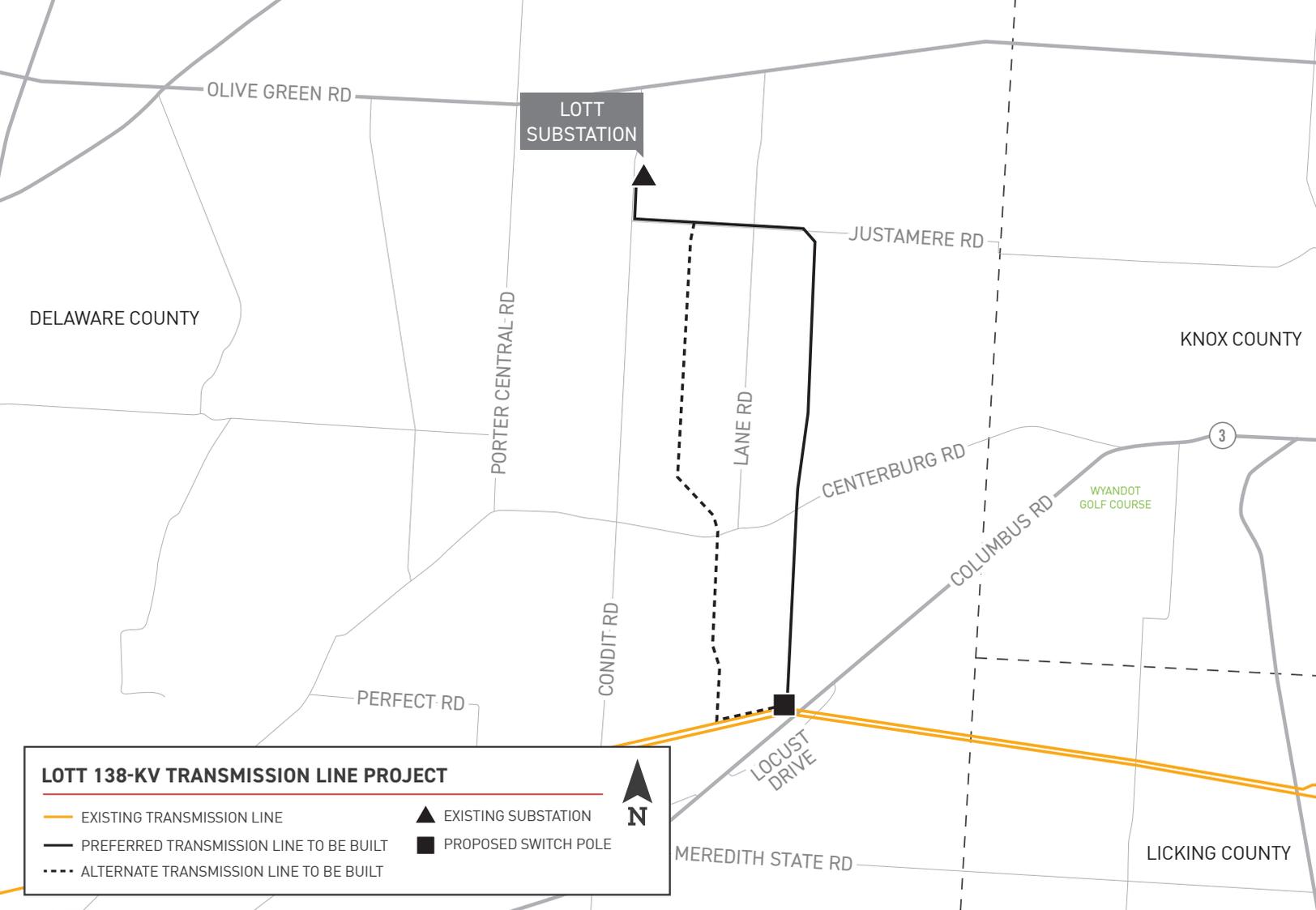
The project area includes Porter and Trenton townships in Delaware County.



### PROJECT SCHEDULE



\*\*Timeline subject to change. \*OPSB: Ohio Power Siting Board



**LOTT 138-KV TRANSMISSION LINE PROJECT**

- EXISTING TRANSMISSION LINE
- PREFERRED TRANSMISSION LINE TO BE BUILT
- - - ALTERNATE TRANSMISSION LINE TO BE BUILT
- ▲ EXISTING SUBSTATION
- PROPOSED SWITCH POLE



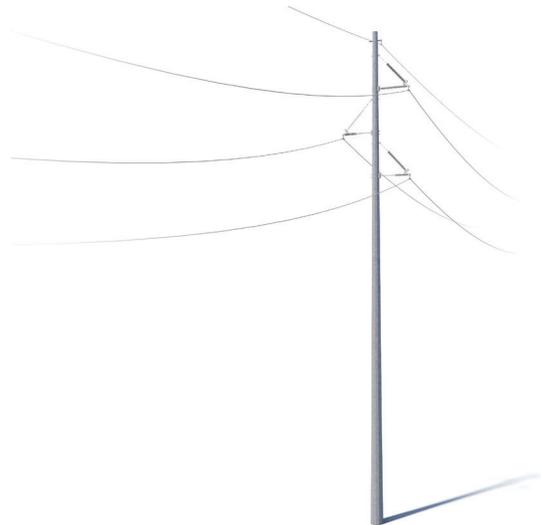
## TYPICAL STRUCTURES

The project involves the use of single, steel poles.

Structure Height: **Approximately 80 -100 feet\***

Right-of-Way Width: **Approximately 100 feet\***

\*Exact structure, height and right-of-way requirements may vary



**AEP OHIO VALUES YOUR INPUT ABOUT THIS PROJECT. PLEASE SEND COMMENTS AND QUESTIONS TO:**

AEP Ohio  
 c/o Meghan Blankenship  
 8500 Smiths Mill Road  
 New Albany, OH 43054

[mdblankenship@aep.com](mailto:mdblankenship@aep.com)  


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 (304) 784-0556  


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[AEPOhio.com/Lott](http://AEPOhio.com/Lott)



# 37.0 at 38: LeBron James goes on scoring tear after birthday

By Greg Beacham  
AP Sports Writer

LOS ANGELES — At a time in life when all but the world's greatest athletes are slowing down, LeBron James has picked up speed.

James turned 38 years old on Dec. 30, deep in his 20th season in the NBA. He celebrated by scoring 47 points on his birthday, and the second-leading scorer in league history has been on a vintage roll ever since.

James is averaging 37.0 points, 9.7 rebounds and 8.6 assists for the Los Angeles Lakers in his seven games since turning 38. He has three 40-point performances in that stretch, including a season-high 48-point effort in a 140-132 victory over Houston on Monday night.

Older golfers take pride in shooting their age. James is nearly scoring his age against the best basketball players in the world — and even amid everything else James has done to redefine the parameters of greatness, his current surge is something special.

"He's just been in an



Los Angeles Lakers' LeBron James (6) flexes his arm during the second half of a game against the Houston Rockets on Monday in Los Angeles. The Lakers won 140-132.

incredible rhythm, and it's showing," Lakers coach Darvin Ham said.

James is closing in on Kareem Abdul-Jabbar's NBA career scoring record while sometimes carrying the short-handed Lakers until Anthony Davis recovers from his latest major injury, and he's doing it all despite constant reminders of the advancement of time.

With increasing regularity, James is playing against the sons of players he faced earlier in his

career, including Rockets youngsters Jabari Smith Jr. and Kenyon Martin Jr. on Monday.

"Hey, you played against my dad your first NBA game ever," Smith Jr. told James on the court in an exchange captured by NBA TV.

"It made me feel extremely old when Junior told me that," James said with a grin. "I think he even said it, like, 'You probably feel old.'"

Both Smith Sr. and Martin Sr. were in the

crowd to watch their sons — and James' son, 18-year-old Bronny, goes to the same Los Angeles-area high school at which Martin Jr. played. James has also played against one of Bronny's former high school teammates, Memphis' Ziaire Williams.

"It's just a unique thing that I've been able to withstand the test of time for as long as I've been playing, to be able to compete now versus father-and-son combina-

tions," James said.

There are concessions to the advances of time, but they're more about injury than age: James sat out two games since turning 38, both to rest a body with accumulated nicks including a sore left ankle.

One night before he lit up the Rockets, James scored his 38,000th career point in a 113-112 loss to Philadelphia on Sunday that left James uncharacteristically brusque and frustrated in his postgame interview. He went on Twitter on Monday to voice his disappointment with the officiating in the Lakers' recent games, calling it "frustrating as hell man."

James admitted he was "extremely tired" Monday, and he easily could have sat out against the lowly Rockets on the back end of back-to-back games. Instead, he decided he couldn't take a night off with the Lakers (20-24) on a three-game losing streak and sitting 13th in the 15-team Western Conference without Davis and injured rotation players Lonnie Walker and Austin Reaves.

So James played 36

minutes and scored 20 of his 48 points in the fourth quarter while continuing his career-long history of performing superbly in back-to-back situations.

"Body was sore from the battle that we had (Sunday) versus Philly," he added. "I guess once I step on the court for warmups and the crowd fills in, it's my job to go out and play the best way I can."

James' scoring spree is yet another reminder his career may not even be close to finished.

The victory over Houston was the 1,400th game of James' NBA career. That's the 11th-most in NBA history, and if he stays reasonably healthy, he'll be within range of Robert Parish's record of 1,611 games played at about the time his current Lakers contract expires in 2025.

That mark doesn't include James' 266 career postseason games, and it's too early to tell whether he'll be able to add to that playoff total this spring. The Lakers are outside the playoff picture for the second straight year, a fact that frustrates James tremendously.

## Bengals

From page 7

### What's working

For the second straight week, big plays by the defense turned the game.

In the Bengals' 27-16 win over the Ravens in the regular-season finale, Cincinnati intercepted rookie quarterback Anthony Brown twice and recovered his fumble in the end zone for a touchdown.

In Sunday's win, the defensive score was

even more improbable. In the fourth quarter, Ravens quarterback Tyler Huntley tried to sneak in from Bengals 1, but the outstretched ball was knocked loose and into the arms of defensive end Sam Hubbard, who rumbled 98 yards the other way for a TD.

"I was excited. I got up and started running down the sideline," receiver Ja'Marr Chase said. "That was cool to see."

### What needs help

Cincinnati hasn't played a complete game in more

than a month. Dominant quarters or halves have been just enough during its nine-game win streak. The offense bogs down. The running game is ineffective.

On Sunday, the Ravens had a chance to tie the game on the last play when Huntley heaved a desperation pass into the end zone and the tipped ball went off the fingers of James Proche.

Another close call.

### Stock up

Hubbard was accompanied by a cadre of team-

mates on his long sprint down the field and needed oxygen when he got to the bench. His 98-yard fumble return was the longest in NFL postseason history. The fifth-year veteran is a captain and one of the emotional leaders of the Cincinnati defense.

"You can't even dream that one up," said Hubbard, who grew up in Cincinnati and played at Ohio State. "That was a tough-fought game with a lot of adversity. To be the guy to come through is an amazing feeling."

### Stock down

Kicker Evan McPherson missed his fifth extra point this season.

### Injuries

There has been no word on whether injuries to Williams and right guard Alex Cappa (ankle) will end their seasons. Williams was seen in the locker room after the game with a crutch and soft cast on his leg.

### Key number

106 — Combined rushing yards by the

Bengals in consecutive games against Baltimore.

### Next steps

Cincinnati travels to play the Bills three weeks after Buffalo safety Damar Hamlin went into cardiac arrest on the field at Paycor Stadium on Jan. 2, leading to the cancellation of the teams' regular-season game.

"It'll be another juice game," Bengals safety Jessie Bates III said. "We tend to do well on the road late when it's cold, so we'll be ready."

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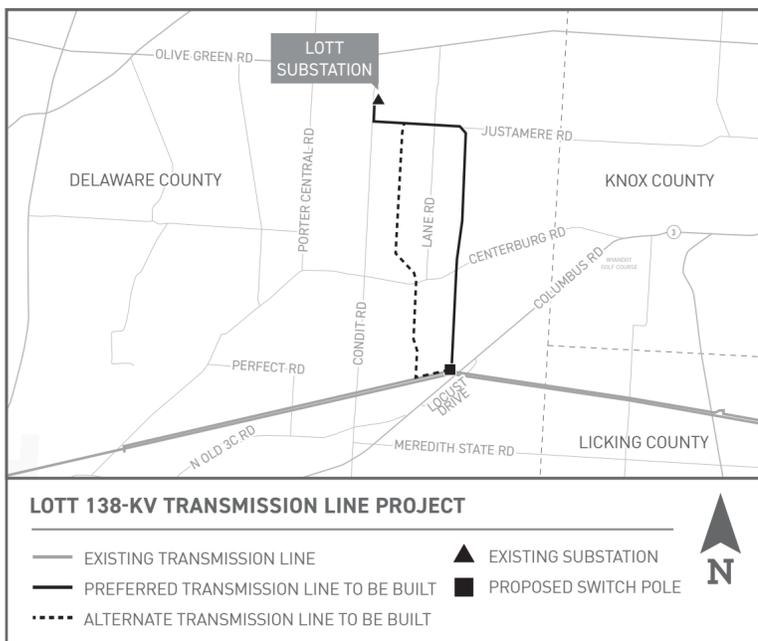
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Please visit [AEPOhio.com/Lott](https://www.aepohio.com/Lott) for more information. The public can also ask questions or make comments about the project by calling 380-784-0556 or sending an email inquiry to [mdblankenship@aep.com](mailto:mdblankenship@aep.com). Mail inquires may be sent to the following address:

AEP Ohio  
Attention: Meghan Blakenship  
8500 Smiths Mill Road  
New Albany, Ohio 43054



APPENDICES

**APPENDIX 8-1 AGENCY CORRESPONDENCE**



# 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

May 5, 2020

Dan Godec  
Stantec  
1500 Lake Shore Drive Suite 100  
Columbus OH 43204-3800

**Re:** 20-339; Lott 138 kV Delivery Point Siting Project

**Project:** The proposed project involves the construction of a new greenfield 138 kV line and switch substation.

**Location:** The proposed project is located in Porter Township, Delaware County, Ohio.

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

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

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

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

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

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

The 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.

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, the rabbitsfoot (*Quadrula cylindrica cylindrica*), a state endangered and federal candidate mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, and the pondhorn (*Unio merus tetralasmus*), a state threatened mussel. This project must not have an impact on freshwater native mussels within the project area. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2020), 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 5 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 (2020) can be found at:

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

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

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

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

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

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

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

Mike Pettegrew  
Environmental Services Administrator (Acting)

**From:** [Finfera, Jennifer](#)  
**To:** [Godec, Daniel](#)  
**Subject:** Re: [EXTERNAL] RE: Request for additional information Lott 138 kV Delivery Point Siting Project, Delaware County, Ohio  
**Date:** Thursday, April 23, 2020 7:40:46 AM

---

Dan,

Your polygon is outside the buffer area for any known threatened or endangered species. However, the area does contain several large blocks of continuous forest habitat. We recommend that the project route minimize disturbance to large forest blocks and that impacts to forest connectivity be limited as much as possible. At a minimum we recommend seasonal clearing to reduce impacts to federally listed bats species.

Once you have determined specific route options we will be able to review the project and determine if seasonal clearing is sufficient or if additional surveys are needed.

Let me know if this provides the information that you need at this time. We look forward to providing more specific comments once preliminary routes are identified.

Sincerely,

Jenny Finfera

---

**From:** Godec, Daniel <Daniel.Godec@stantec.com>  
**Sent:** Wednesday, April 22, 2020 3:37 PM  
**To:** Finfera, Jennifer <jennifer\_finfera@fws.gov>  
**Subject:** [EXTERNAL] RE: Request for additional information Lott 138 kV Delivery Point Siting Project, Delaware County, Ohio

Hi Jenny,

The amount of tree clearing is yet to be determined but tree clearing will be limited as much as possible. We are currently in the process of preparing a routing and siting study report for this project that would evaluate several different alternate routes for this greenfield 138 kV transmission line project. Your response data to this original request will be utilized for the routing and siting report, including avoiding specific T/E species locations or habitats where possible. That's why we submitted a general study area map with our technical assistance request. The alternate routes we evaluate will fall within the overall study area polygon.

Let me know if you have any other questions.

Thanks,

Dan

**Daniel Godec**  
Senior Environmental Project Manager

**From:** [Ohio, FW3](#)  
**To:** [Godec, Daniel](#)  
**Cc:** [nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us); [Parsons, Kate](#)  
**Subject:** AEP Lott 138 kV Delivery Point Siting Project, Delaware County, Ohio  
**Date:** Tuesday, November 23, 2021 9:41:09 AM  
**Attachments:** [image.png](#)  
[image.png](#)

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TAILS# 03E15000-2020-TA-1277

Dear Mr. Godec,

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

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

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

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

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

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

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

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

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

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

Sincerely,



Patrice Ashfield

Field Office Supervisor

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

Direct: 513 842-8200  
Mobile: 513 265-9763  
Fax: 513 842-8250  
[Daniel.Godec@stantec.com](mailto:Daniel.Godec@stantec.com)



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---

**From:** Finfera, Jennifer <jennifer\_finfera@fws.gov>

**Sent:** Wednesday, April 22, 2020 3:09 PM

**To:** Godec, Daniel <Daniel.Godec@stantec.com>

**Subject:** Request for additional information 138 kV Delivery Point Siting Project, Delaware County, Ohio

How much tree clearing would be required for this project?

Jenny Finfera  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
4625 Morse Rd., Suite 104  
Columbus, Ohio 43230

614-416-8993 ext. 113  
Direct:614-528-9706

# 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



August 29, 2022

22-050, No IPaC Project Code

Dear Mr. Sparks:

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).

We have received your summer bat survey report for the subject project. The survey was conducted following current Service guidelines. No Indiana bats (*Myotis sodalis*) were captured/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: <https://ecos.fws.gov/ecp/species/9045>). 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, 2027 without further coordination with this office.

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

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

species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

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

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

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

Sincerely,



Patrice Ashfield  
Field Office Supervisor

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

## Amy J Toohey

---

**From:** Eileen.Wyza@dnr.ohio.gov  
**Sent:** Thursday, September 1, 2022 10:29 AM  
**To:** Boyer, Angela; Dale W. Sparks  
**Cc:** Amy J Toohey; Jo Garofalo; Natasha Brown  
**Subject:** RE: [EXTERNAL] Final Report Ohio Bat Project 22-050, AEP's Cudit to Lott

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Dale,

The Ohio Division of Wildlife (DOW) has received the summer bat survey report for the Condit to Lott Transmission Line project, conducted according to current U.S. Fish and Wildlife Service (USFWS) and Ohio Department of Natural Resources, Division of Wildlife guidance. No Indiana (*Myotis sodalis*), northern long-eared (*M. septentrionalis*), little brown (*M. lucifugus*), or tricolored (*Perimyotis subflavus*) bats were detected, suggesting risk to these state-endangered species is low in the project area and tree cutting during summer maternity season is not likely to result in direct mortality of these species. Please contact DOW immediately should any bats be discovered. Should tree cutting need to occur after March 31, 2027, DOW recommends further consultation to reevaluate risk to these bat species.

This guidance does not constitute a full ODNR environmental review. If required, please contact the ODNR, Office of Real Estate Management to submit a request for agency environmental review coordination.

Thank you,



**Eileen Wyza**  
Wildlife Biologist  
Ohio Division of Wildlife  
Phone: 614-265-6764  
Email: [Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)

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**From:** Boyer, Angela <[angela\\_boyer@fws.gov](mailto:angela_boyer@fws.gov)>  
**Sent:** Monday, August 29, 2022 10:15 AM  
**To:** Dale W. Sparks <[DSparks@envsi.com](mailto:DSparks@envsi.com)>; Wyza, Eileen <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>

**Cc:** Amy J Toohey <ajtoohey@aep.com>; Jo Garofalo <JGarofalo@envsi.com>; Natasha Brown <NBrown@envsi.com>  
**Subject:** Re: [EXTERNAL] Final Report Ohio Bat Project 22-050, AEP's Cedit to Lott

Hello,

The USFWS response letter is attached.

Sincerely,  
Angie

---

**From:** Dale W. Sparks <[DSparks@envsi.com](mailto:DSparks@envsi.com)>  
**Sent:** Friday, August 26, 2022 1:30 PM  
**To:** Boyer, Angela <[angela\\_boyer@fws.gov](mailto:angela_boyer@fws.gov)>; Wyza, Eileen <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>  
**Cc:** Amy J Toohey <[ajtoohey@aep.com](mailto:ajtoohey@aep.com)>; Jo Garofalo <[JGarofalo@envsi.com](mailto:JGarofalo@envsi.com)>; Natasha Brown <[NBrown@envsi.com](mailto:NBrown@envsi.com)>  
**Subject:** [EXTERNAL] Final Report Ohio Bat Project 22-050, AEP's Cedit to Lott

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Angie and Eileen,

Please find attached the final report for AEP's Cedit to Lott project.



**Dale W. Sparks, Ph.D.**

Principal Scientist

Environmental Solutions & Innovations, Inc.  
4525 Este Avenue | Cincinnati, OH 45232 | USA  
t: 513.451.1777 f: 513.451.3321 c: 513.503.2667  
[dsparks@envsi.com](mailto:dsparks@envsi.com) | [www.envsi.com](http://www.envsi.com)

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In reply, refer to  
2021-DEL-52198

August 25, 2021

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

**RE: Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received July 27, 2021 regarding the proposed Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for the Approximately 4.8 km (3.0 mi) Condit Switch-Lott 138kV Greenfield Transmission Line Project in Trenton and Porter Townships, Delaware County, Ohio* by Ryan J. Weller (Weller & Associates, Inc., 2021).

A literature review, visual inspection, surface collection and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological sites are located within the project area. Three (3) new archaeological sites were identified during the investigation. Ohio Archaeological Inventory (OAI)# 33DL3406-33DL3408 are recommended not eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation and no further archaeological survey is necessary.

The following comments pertain to the *History/Architecture Investigations for the 4.8 km (3 mi) Condit Switch-Lott 138kV Greenfield Transmission Line Project in Trenton and Porter Townships, Delaware County, Ohio* by Scott McIntosh and Austin White (Weller & Associates, Inc., 2021).

A literature review and field survey were completed as part of the investigations. A total of 8 (eight) architectural resources were identified within the Area of Potential Effects (APE) during the field survey. It is Weller's recommendation that none of these properties are eligible for inclusion in the NRHP. Our office agrees with Weller's recommendations of eligibility.

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

Sincerely,

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

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1089467, 1089468



In reply, refer to  
2021-DEL-52198

November 19, 2021

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

**RE: Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received November 18, 2021 regarding the proposed Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Addendum Archaeological Investigations for the Condit Switch-Lott 138kV Greenfield Transmission Line Project in Trenton and Porter Townships, Delaware County, Ohio (PO 80219611; BPID J19211002; WO T10069856002)* by Ryan J. Weller (Weller & Associates, Inc., 2021).

A literature review, visual inspection, surface collection and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological sites are located within the addendum project area and no new archaeological sites were identified during survey. Our office agrees no further archaeological survey is necessary. No new architectural resources were identified within the Area of Potential Effects (APE).

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

Sincerely,

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

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1090913



In reply, refer to  
2021-DEL-52198

July 27, 2022

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

**RE: Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received June 28, 2021 regarding the proposed Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Addendum Archaeological Investigations for the 6.1 km (3.8 mi) Preferred Route and the 4.8 km (3.0 mi) Alternate Route for the Condit Switch-Lott 138kV Greenfield Transmission Line Project in Trenton and Porter Townships, Delaware County, Ohio* by Ryan J. Weller (Weller & Associates, Inc., 2022).

A literature review, visual inspection, surface collection and shovel test unit excavation was completed as part of the investigations. A very small portion of the previously identified Ohio Archaeological Inventory (OAI) 33DL3406 is located within the project area. The site was not reidentified during this survey. Seven (7) new archaeological sites were identified during the investigation, OAI #33DL3460-33DL3466 are recommended not eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation and no further archaeological survey is necessary.

It should be noted, the Robinson Cemetery (OGSID 2955) is located adjacent to the "Alternate Route" of the proposed project. While our office has a "high confidence location" for this cemetery, due to the specific measurements provided by the Ohio Genealogical Society (OGS) when they recorded this cemetery, it appears all aboveground evidence of the cemetery has been destroyed. Robinson Cemetery was recorded by the WPA, showing three (3) possible burial plots, and a similar location as currently mapped. Based on the measurement provided by the OGS and WPA, it is unlikely the cemetery is located within the project area. However, if the "Alternate Route" is chosen for the proposed project, it should be noted there is a cemetery in the general vicinity of the project area. If evidence of this cemetery is discovered during implementation, our office should be notified immediately.

The following comments pertain to the *Addendum History/Architecture Investigations for the 6.1 km (3.8 mi) Preferred Route and the 4.8 km (3.0 mi) Alternate Route for the Condit Switch-Lott 138kV Greenfield Transmission Line Project in Trenton and Porter Townships, Delaware County, Ohio* by Scott McIntosh (Weller & Associates, Inc., 2022).

A literature review and field survey were completed as part of the investigations. A total of nineteen (19) architectural resources fifty years of age or older were identified within the Area of Potential Effects (APE) during the field survey. It is Weller's recommendation that none of these properties are eligible for inclusion in the NRHP. Our office agrees with Weller's recommendations of eligibility.

Based on the information provided, we agree that the project as proposed will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Our office requests Weller & Associates, Inc. complete the OAI forms for OAI#33DL3460-33DL3466 as soon as possible. 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](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

RPR Serial No: 1093949, 1093950

**OHIO HISTORY CONNECTION**

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



In reply, refer to  
2021-DEL-52198

February 22, 2023

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

**RE: Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio**

Dear Mr. Weller:

This letter is in response to the correspondence received February 16, 2023 regarding the proposed Condit Switch-Lott 138kV Greenfield Transmission Line Project, Trenton and Porter Townships, Delaware County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Addendum 3: Archaeological Investigations for a Reroute Associated with the Condit Switch-Lott 138kV Greenfield Transmission Line Project in Trenton and Porter Townships, Delaware County, Ohio* by Ryan J. Weller (Weller & Associates, Inc., 2023).

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

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

Sincerely,

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

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

RPR Serial No: 1096975

**This foregoing document was electronically filed with the Public Utilities  
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**in**

**Case No(s). 22-0940-EL-BTX**

Summary: Application Part 2 of 3 electronically filed by Hector Garcia-Santana on  
behalf of Ohio Power Company