

Construction Notice for the Hannibal – Ormet 138 kV Transmission Line Reconductor Project



An **AEP** Company

PUCO Case No. 25-0131-EL-BNR

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

Submitted by:
Ohio Power Company.

March 3, 2025

CONSTRUCTION NOTICE

Ohio Power Company

Hannibal-Ormet 138 kV Transmission Line Reconductor Project

4906-6-05 Accelerated Application Requirements

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

4906-6-05(B) General Information

B(1) Project Description

Provide the name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a letter of notification or construction notice application.

The Company is proposing the Hannibal – Ormet 138 kilovolt (kV) Transmission Line Reconductor Project (Project) in Ohio Township, Monroe County, Ohio. The Project will reconductor approximately 0.1 mile of existing 138 kV transmission line between the Hannibal Station and the Ormet North Station. The Project is located within existing Company-owned easements. The location of the Project is shown in Figure 1 and Figure 2 in Appendix A.

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

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

The Project has been assigned PUCO Case No 25-0131-EL-BNR.

B(2) Statement of Need

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

An existing customer has requested an additional 100 MW of load, bringing the peak demand for the customer to 200 MW. To serve the customer's increase in load, the Company will reconductor approximately 0.1 mile of 138 kV single-circuit transmission line between the Hannibal and Ormet North stations. The new conductor is larger and able to handle the increase in load, which current conductors cannot. Continuing to use the current conductors at the customers requested capacity would result in the conductors becoming overloaded potentially resulting in tripping and an inability to serve the customer. The customer has requested an in-service date of April 2025 for their increase in load.

Failure to move forward with the proposed Project will result in the inability to serve the customer's load expectations and thereby jeopardize the customer's plans in the Monroe County, Ohio area.

The need and solution were presented and reviewed with stakeholders at the October 18, 2024, and February 14, 2025, PJM SRRTEP meetings, see Appendix B. A supplement upgrade number is yet to be assigned by PJM. This Project was not included in the Company's 2024 Long-Term Forecast Report, as the Project was unknown at the time of filing.

B(3) Project Location

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

The Project is located in Ohio Township, Monroe County, Ohio. The location of the Project in relation to existing transmission lines and substations is shown on Figure 1 in Appendix A.

B(4) Alternatives Considered

Describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility including, but not limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

Due to the location of the existing Hannibal – Ormet 138 kV transmission line, its short length, and the nature of the Project, no other alternatives were considered for the reconductor. The Project uses existing structures and ROW to minimize land use impacts. As such, abandoning the existing structures, which are in good condition, and existing ROW for a new greenfield route is neither practical nor necessary, and any alternatives would add additional length to the Project without any additional benefit.

Further, the Company confirmed that outages could be obtained in order to reconductor the existing line. Ecological and cultural surveys were conducted within the existing easement, and it was determined that no cultural or ecological features would be permanently impacted by the Project. Therefore, this Project

CONSTRUCTION NOTICE FOR HANNIBAL-ORMET 138 KV TRANSMISSION LINE RECONDUCTOR PROJECT

reflects the most suitable location and is the most appropriate solution for meeting the Company and Customer’s needs in the area.

B(5) Public Information Program

Describe its public information program to inform affected property owners and residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

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

B(6) Construction Schedule

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

Construction of the Project is planned to begin in June 2025 with an anticipated in-service date of July 2025.

B(7) Area Map

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

Figure 1, in Appendix A, identifies the location of the Project area on the United States Geological Survey 1:24,000 topographic quadrangle map (New Martinsville, Ohio). Figure 2, in Appendix A, displays the Project components on a 2022 aerial photograph.

B(8) Property Agreements

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

A list of properties required for the Project are provided in **Table 1**, below.

Table 1 – Property Agreements

Property Parcel Number	Agreement Type	Easement or Option Obtained (Yes/No)
150020060000	Existing Easement	Yes
150020130000	Existing Easement	Yes

B(9) Technical Features

Describe the following information regarding the technical features of the project:

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

Voltage: 138 kV
Conductors: (3) 1033 KCM CURLEW ACSS (54/7)
Static Wire: (1) 7#8 Alumoweld
Insulators: Polymer
ROW Width: 100 feet
Structure Type: Existing structures to be reused, which include (2) single circuit, monopole steel self-supporting dead-end structures on concrete pier foundations

B(9)(b) Electric and Magnetic Fields

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

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

B(9)(c) Project Cost

The estimated capital cost of the project.

The cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$512,000 using a Class 4 estimate. Per the Ohio retail tariff, the Customer is responsible for 40% of the cost of the Project. The remainder of the Project cost, pursuant to the PJM OATT, will be recovered in the Ohio Power Company FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Ecological Impacts

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

B(10)(a) Land Use Characteristics

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

The Project location and vicinity have historically been primarily wooded lots with scattered industrial development along the Ohio River. An aerial photograph of the Project vicinity is provided as **Figure 2**. The Project is located in Ohio Township, Monroe County, Ohio. The Project vicinity is currently comprised primarily of industrial land use and lesser amounts of forested lands to the north and the south. Additionally, a railroad is adjacent to the north of the site and the Ohio River to the southeast. There are no schools, hospitals, places of worship, or airports within 1,000 feet of the Project. No changes in land use are anticipated as a result of the Project.

B(10)(b) Agricultural Land Information

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

The Project does not impact agricultural land. No properties registered as agricultural district land are located in the Project area based on data received from the Monroe County Auditor's Office on January 22, 2025. No impacts to agricultural land use are anticipated as a result of the Project.

B(10)(c) Archaeological and Cultural Resources

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

The Company's consultant completed a Phase I Cultural Resources Management Investigation of the Project area and submitted the results to the Ohio State Historic Preservation Office (SHPO) on December 19, 2024. No sites listed on the National Register of Historic Places were identified within the Project area or adjacent portions of the parcels surveyed for cultural resources. Therefore, no further investigation was considered to be necessary by the consultant. Correspondence from the SHPO was received on October 30, 2024 and is included in Appendix C. The SHPO stated that they agree that the Project will have no adverse effect on historic properties and that no further archaeological work is necessary.

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

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

A summary of anticipated permits and authorizations for the Project is provided in the **Table 2**, below. There are no other known local, state, or federal requirements that must be met prior to commencement of the Project.

Table 2 – Anticipated Permits

Permit/Authorization/Coordination	Agency	Date
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete 10/30/2024, no additional work required
Threatened and Endangered Species	United States Fish and Wildlife Service	Consultation complete 11/07/2024
Threatened and Endangered Species	Ohio Department of Natural Resources	Consultation complete 11/21/2024

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

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

On October 25, 2024, coordination letters were submitted to the United States Fish and Wildlife Service and the Ohio Department of Natural Resources Ohio Natural Heritage Program, and Division of Wildlife, seeking an environmental review of the Project for potential impacts to state and/or federally protected species. Ohio Department of Natural Resources and United States Fish and Wildlife Service provided responses on November 21, 2024 and November 7, 2024, respectively. Copies of the agencies’ responses are presented in Appendix C.

Appendix D lists the federal and state threatened or endangered species in the Project area.

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

B(10)(f) Areas of Ecological Concern

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

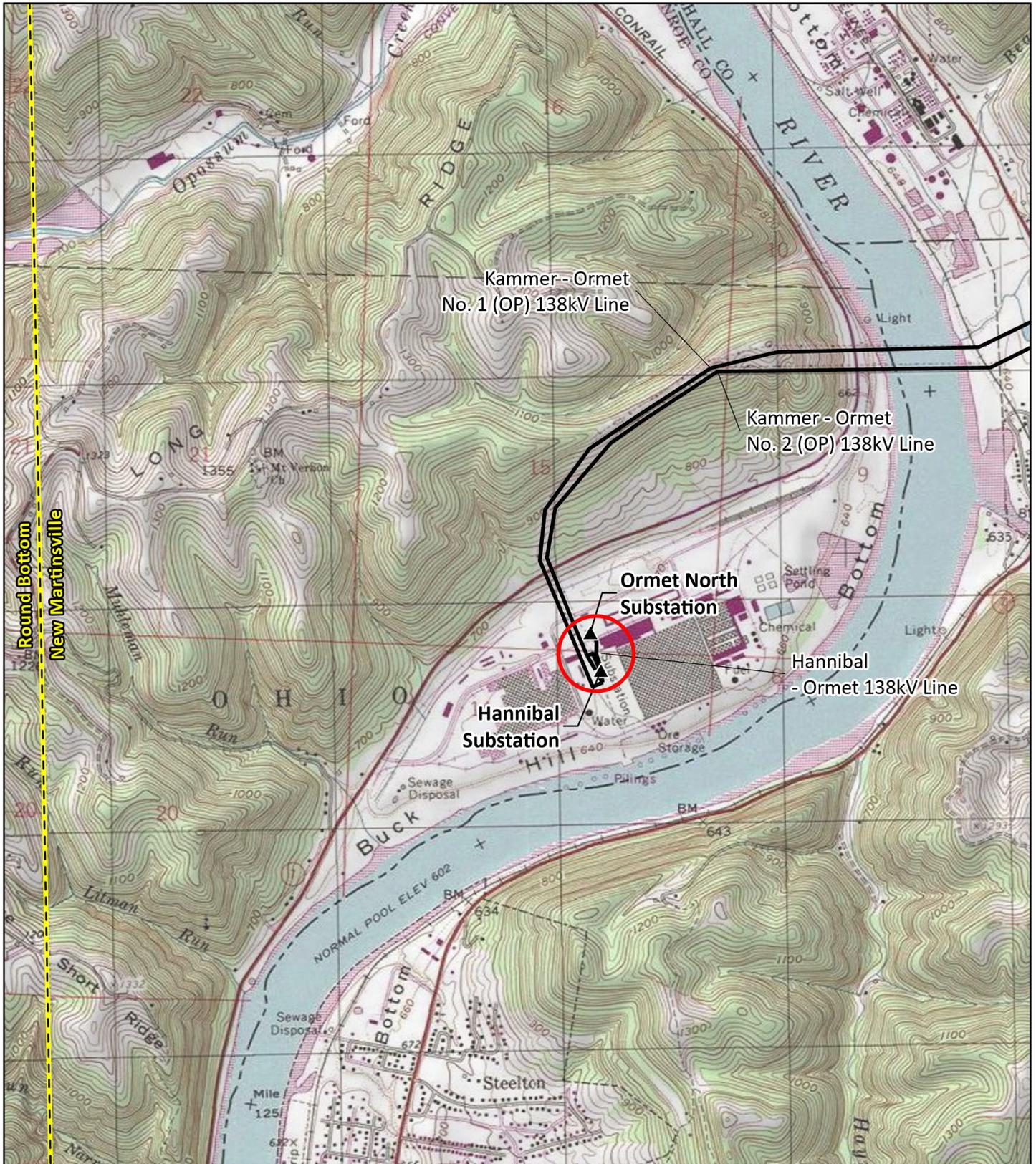
The Company's consultant prepared an ecological survey report on January 16, 2025, which is provided in Appendix E. The Project area is located within an active industrial site that is absent of streams, wetlands, and ponds. Based on a review of the Protected Areas Database of the United States as well as the Conservation Easement Database, there are no state or national parks, forests, wildlife areas, or mapped conservation easements in the vicinity of the Project. The Project is not within the boundaries of any 100-year floodplains or floodways.

B(10)(g) Unusual Conditions

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

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

Appendix A Project Maps



Round Bottom
New Martinsville

Kammer - Ormet
No. 1 (OP) 138kV Line

Kammer - Ormet
No. 2 (OP) 138kV Line

Ormet North
Substation

Hannibal
Substation

Hannibal
- Ormet 138kV Line

- ▲ Existing Substation
- Existing Transmission Line
- Project Area
- ▭ USGS Topographic Line

Data Sources: AEP, USGS 7.5'
Topographic Quadrangle
(New Martinsville)

Coordinate System
and Datum:
NAD 83 State Plane
Ohio South, Feet



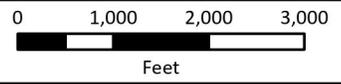
February 19, 2025

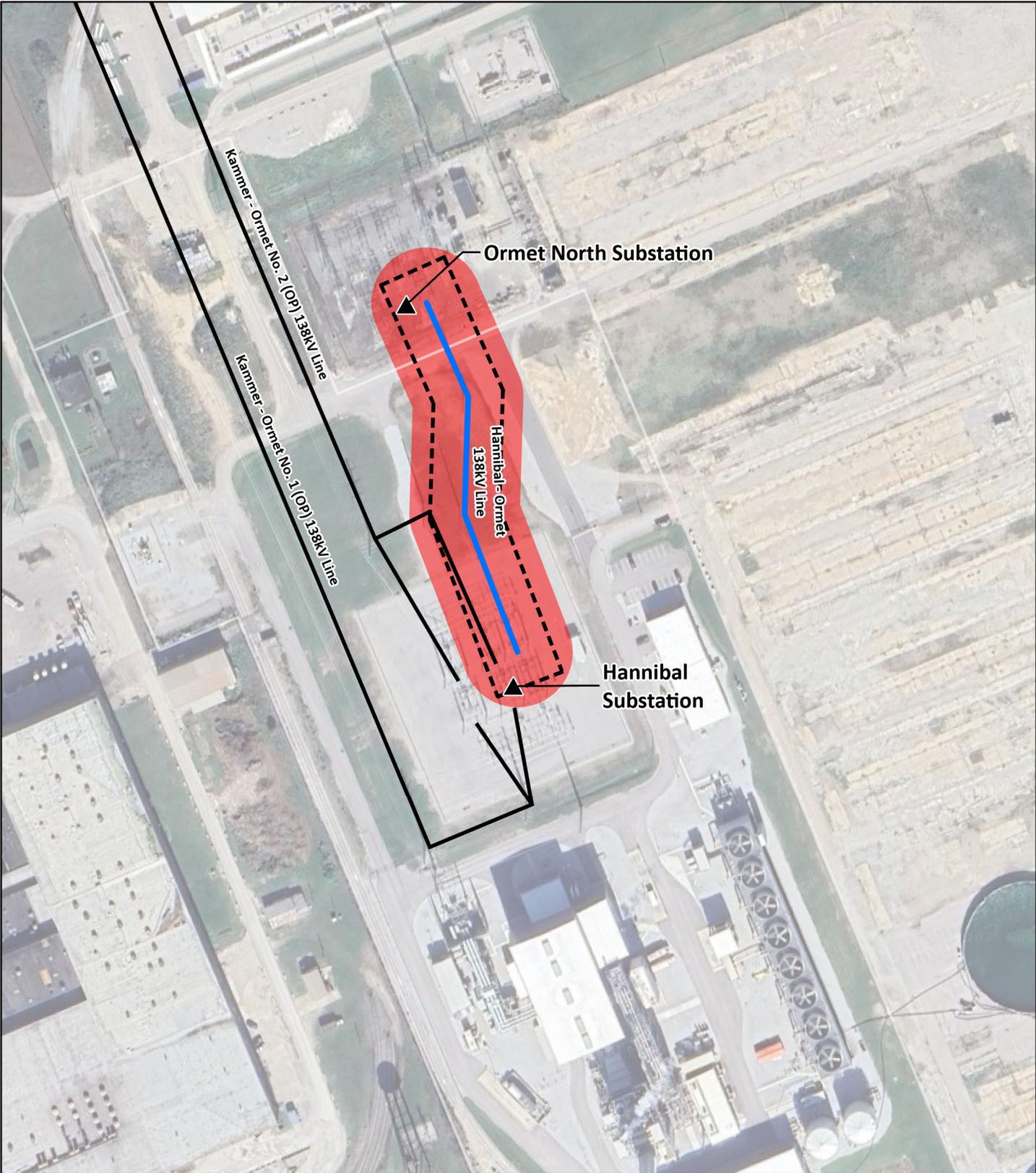


FIGURE 1
TOPOGRAPHIC OVERVIEW

AEP OHIO
An AEP Company

Hannibal - Ormet 138kV
Transmission Line Project





- ▲ Existing Substation
- Proposed Centerline
- Existing Transmission Line
- - - Proposed 100ft Right-of-Way
- Proposed 160ft Route Corridor
- ▭ Parcel Boundary

Data Sources: AEP,
Monroe County,
Google Imagery, 2022

Coordinate System
and Datum:
NAD 83 State Plane
Ohio South, Feet



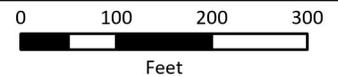
February 19, 2025



FIGURE 2 AERIAL MAP



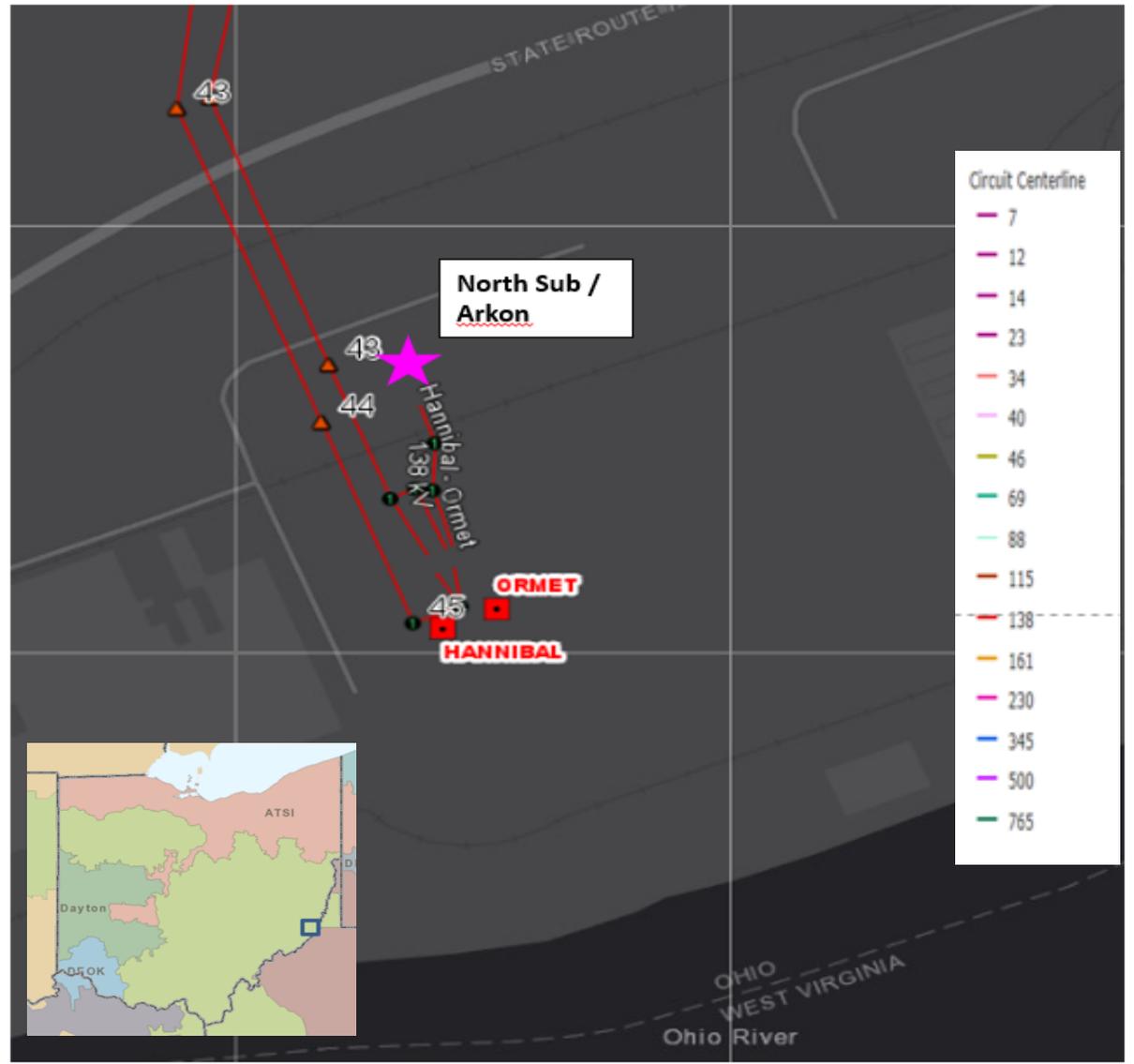
Hannibal - Ormet 138kV
Transmission Line Project



Appendix B PJM Solution

Need Number: AEP-2024-OH039
Process Stage: Solutions Meeting: 2/14/2025
Previously Presented: Needs Meeting: 10/18/2024
Supplemental Project Driver: Customer Service
Specific Assumption Reference: AEP Connection Requirements for the AEP Transmission System (AEP Assumptions Slide 12)

Problem Statement:
 A customer has requested an increase to their existing service out of AEP's Hannibal 138 kV station in Monroe County, OH. The anticipated increase in load is 100MW, bringing the customer's total load to 200 MW at the site. They have requested an in-service date of April 2025.



AEP Transmission Zone M-3 Process Hannibal, OH

Need Number: AEP-2024-OH039

Process Stage: Solutions Meeting: 2/14/2025

Proposed Solution:

Hannibal - North Sub 138 kV: Reconductor the Hannibal - North Sub 138 kV circuit using 1033 ACSS 54/7 CURLEW to accommodate increased customer loading at North Sub Station. Estimated Cost: \$0.392 M

Transmission Cost Estimate: \$0.392 M

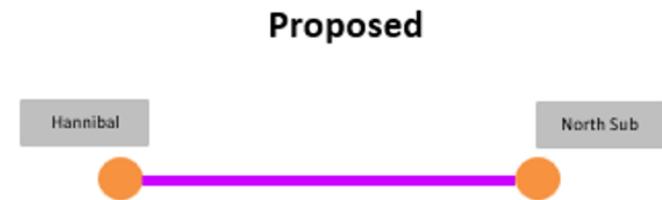
Alternatives Considered:

Tap the Hannibal – Kammer 138 kV lines that run parallel to the site. This would require a new switching structure as well as additional station work at the customer owned North Substation to accommodate the feed.

Projected In-Service: 07/17/2025

Project Status: Scoping

Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



Appendix C Agency Coordination



In reply, refer to
2024-MOE-62506

October 30, 2024

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

RE: Arkon Delivery Project, Ohio Township, Monroe County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on October 1, 2024, regarding the proposed Arkon Delivery Project, Ohio Township, Monroe 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 (OPSB) rules for siting this project (OAC 4906-4 & 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Cultural Resources Management Investigations for the 2.9 ha (7.3 ac) Arkon Delivery Project (Hannibal-Ormet 138kV) in Ohio Township, Monroe County, Ohio* by Ryan J. Weller and Scott McIntosh (Weller & Associates, Inc. 2024). This project is related to new transmission line structures that will connect the Hannibal and Ormet Stations. A literature review, visual inspection, and limited shovel probing were completed as part of the investigations. The eastern portion of the project area has been previously professionally surveyed. The project area is located within an existing industrial development. These investigations confirmed extensive disturbance within the project area. No previously identified archaeological sites are located within the project area and no new archaeological sites were identified during the survey. Our office agrees no additional archaeological investigation is needed. Architectural resources within the Area of Potential Effect (APE) have been previously addressed and no historic properties were identified (Weller and McIntosh 2020). Our office agreed with these recommendations on August 11, 2020 (2020-MOE-49113).

Based on the information provided, our office agrees 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 archaeological resources are discovered during the implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me by e-mail at cgullett@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Gullett".

Catherine Gullett, Project Reviews Coordinator - Archaeology
Resource Protection and Review
State Historic Preservation Office

RPR Serial No: 1105069



POWER ENGINEERS, INC.
11733 CHESTERDALE ROAD
CINCINNATI, OHIO 45246 USA

PHONE 513-326-1500
FAX 513-326-1550

October 18, 2024

Attention: Mr. Mike Pettegrew

Ohio Department of Natural Resources
Office of Real Estate
2045 Morse Road, Building E-2
Columbus, OH 43229-6693
Email: environmentalreviewrequest@dnr.state.oh.us

Subject: Request for Environmental Review, Arkon Station Project; Ohio Township, Monroe County, OH

Dear Mr. Pettegrew:

On behalf of the American Electric Power Ohio Transmission Company, Inc., POWER Engineers, Inc., is requesting that the Ohio Department of Natural Resources (ODNR) – Office of Real Estate complete an environmental and Natural Heritage Database review within 0.5 mile of the proposed Arkon Station Project (Project) in Ohio Township, Monroe County, Ohio. The Project is located at coordinates 39.703425, -80.845545, as shown on the attached Project Location Map. A file containing the shapefiles (UTM Zone 17 NAD 83) for the Project study area has also been provided electronically.

The Project proposes to install new transmission line structures from the Hannibal Station to the Ormet Station. The Project is located within an existing American Electric Power Ohio Transmission Company, Inc. facility.

Please provide the results of the ODNR's environmental review, including the results of the ODNR Natural Heritage Database search, at your earliest convenience. If you require any additional information about the Project, please contact me at 304-550-2882 or email daniel.ware@powereng.com. Thank you for your time and assistance.

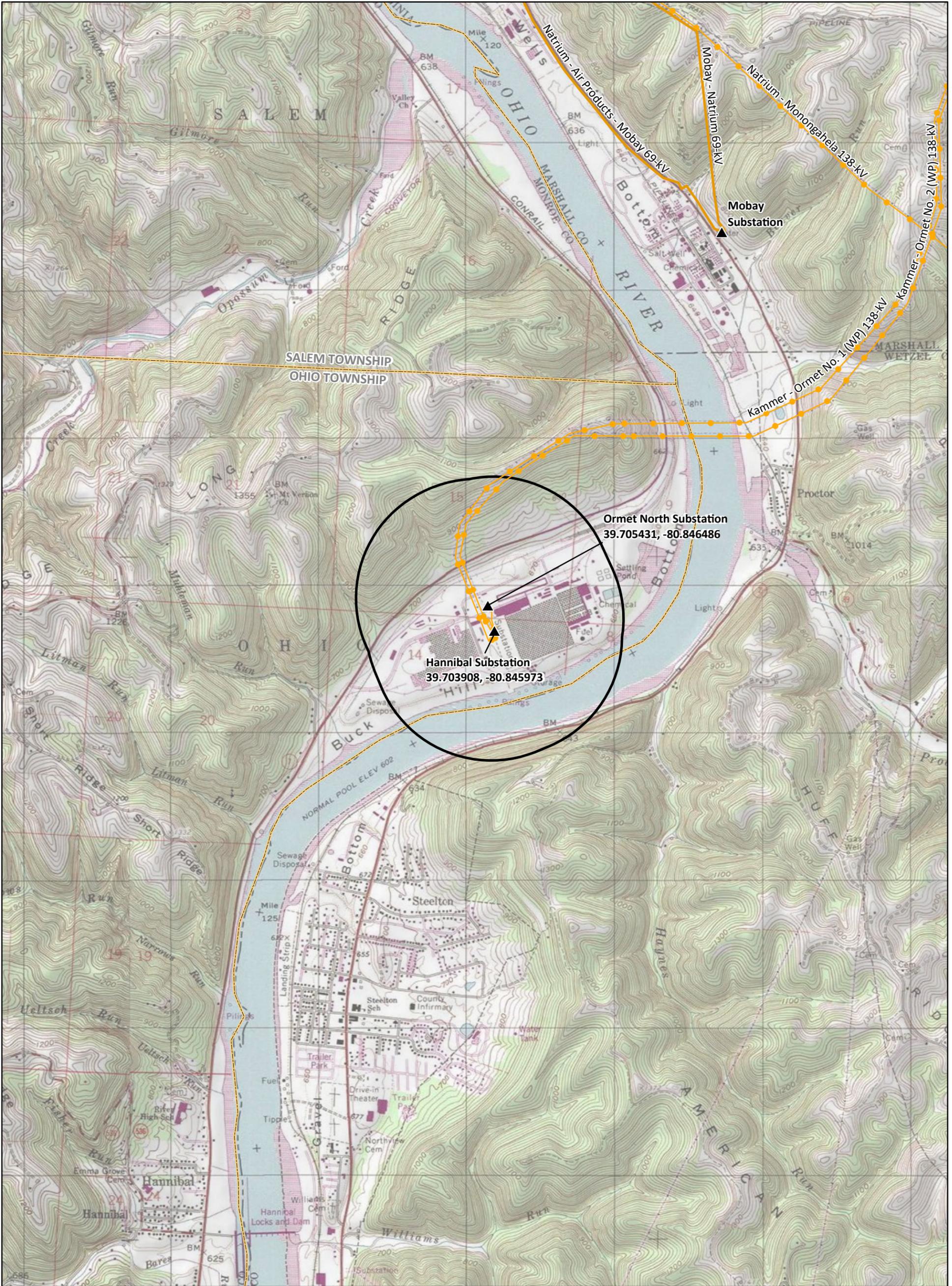
Sincerely,

A handwritten signature in black ink that reads "Daniel Ware".

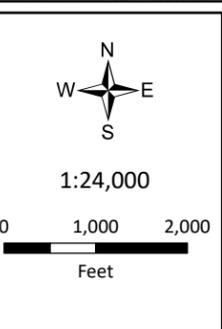
Daniel Ware, PWS
Natural Resources Technical Lead

Attachments: Arkon Station Project Location Map
Arkon Station Shapefiles

c: Jonathon Rose – American Electric Power



- ▲ Existing Substation
- Existing Transmission Line (69-kV or Lower)
- Existing Transmission Line (138-kV - 345-kV)
- ▭ Study Area
- - - Township Boundary



OVERVIEW

The State of Ohio
Monroe County
Ohio Township

NAD 1983 UTM Zone 17N
Meter
Transverse Mercator
North American 1983

Date: 10/15/2024
Author: CNR
Prj: 254633, Arkon Station

Arkon Station Project

Project Location



**Department of
Natural Resources**

ohiodnr.gov

Mike DeWine, Governor
Jon Husted, Lt. Governor
Mary Mertz, Director

Office of Real Estate & Land Management

Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

November 21, 2024

Daniel Ware
Power Engineers, Inc.
6530 W. Campus Oval Road, Suite 200
New Albany, Ohio 43054

Re: 24-1652 - Akron Station

Project: The proposed project involves the installation of new transmission line structures from the Hannibal Station to the Ormet Station.

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

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

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

Tippecanoe Darter (*Etheostoma tippecanoe*), SC
Channel Darter (*Percina copelandi*), T
River Darter (*Percina shumardi*), T
Threehorn Wartyback (*Obliquaria reflexa*), SC

Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened. The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Features searched include locations of rare and endangered plants and animals determined to be of value to the conservation of their species, high quality plant communities, animal breeding assemblages, and outstanding geological features.

The species listed above are recorded within the boundaries of the specified project area. Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources.

Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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

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

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

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

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

This project must not have an impact on native mussels. This applies to both listed and non-listed species, as all species of mussel are protected in Ohio. Per the Ohio Mussel Survey Protocol (2022), 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. 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, 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](#). If there is no in-water work proposed, impacts to mussels are not likely.

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

State Endangered

Ohio lamprey (*Ichthyomyzon bdellium*)

State Threatened

American eel (*Anguilla rostrata*)

channel darter (*Percina copelandi*)

river darter (*Percina shumardi*)

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

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species.

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

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

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

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

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

***Expiration:** ODNR Environmental Reviews are typically valid for 2 years from the issuance date. If the scope of work, project area, construction limits, and/or anticipated impacts to natural resources have changed significantly from the original project submittal, then a new Environmental Review request should be submitted.*



POWER ENGINEERS, INC.
11733 CHESTERDALE ROAD
CINCINNATI, OHIO 45246 USA

PHONE 513-326-1500
FAX 513-326-1550

October 18, 2024

Attention: Mr. Dan Everson
United States Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230
Email: Ohio@fws.gov

Subject: Request for Environmental Review, Arkon Station Project; (Project Code: 2025-0003751), Ohio Township, Monroe County, OH

Dear Mr. Everson:

On behalf of the American Electric Power Ohio Transmission Company, Inc., POWER Engineers, Inc., is requesting that the United States Fish and Wildlife Service's Ohio Ecological Services Field Office provide comments regarding federally listed threatened and endangered species within 0.5 mile of the proposed Arkon Station Project (Project) in Ohio Township, Monroe County, Ohio. The Project is located at coordinates 39.703425, -80.845545, as shown on the attached Project Location Map. Results of the United States Fish and Wildlife Service's Information for Planning and Consultation official species list (Project Code: 2025-0003751), Project Location Map, and file containing the shapefiles (UTM Zone 17 NAD 83) for the Project study area are included.

The Project proposes to install new transmission line structures from the Hannibal Station to the Ormet Station. The Project is located within an existing American Electric Power Ohio Transmission Company, Inc. facility.

Please provide comments regarding threatened and endangered species for the proposed Project at your earliest convenience. If you require any additional information about the Project, please contact me at 304-550-2882 or email daniel.ware@powereng.com. Thank you for your time and assistance.

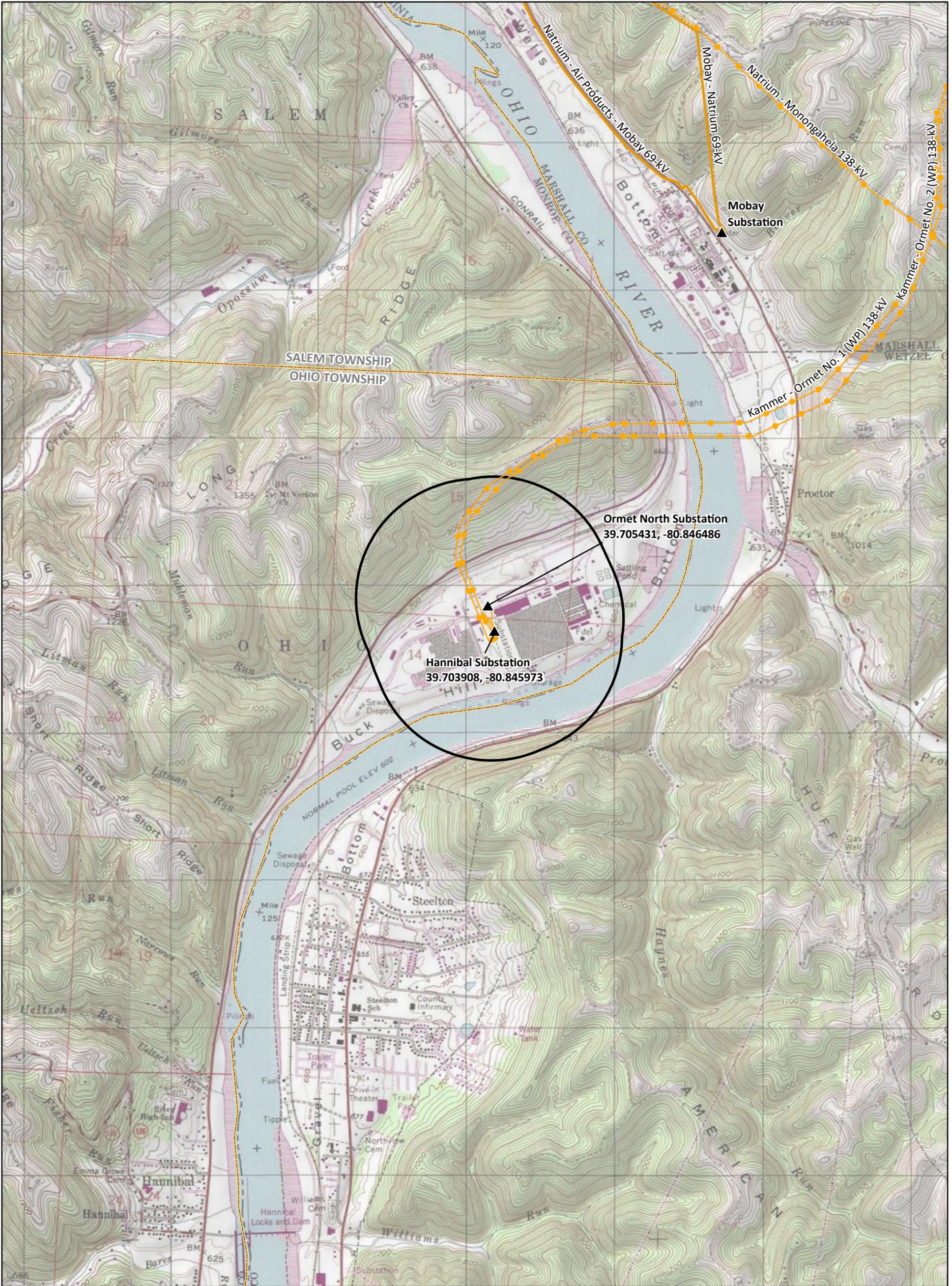
Sincerely,

A handwritten signature in black ink that reads "Daniel Ware". The signature is written in a cursive, slightly slanted style.

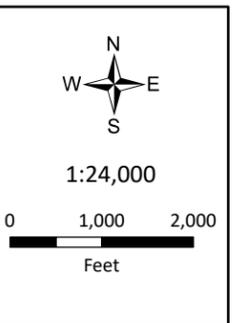
Daniel Ware, PWS
National Resources Technical Lead

Attachments: Arkon Station Project Location Map
Arkon Station IPaC Results
Arkon Station Shapefiles

c: Jonathon Rose – American Electric Power



- ▲ Existing Substation
- Existing Transmission Line (69-kV or Lower)
- Existing Transmission Line (138-kV - 345-kV)
- ▭ Study Area
- - - Township Boundary



OVERVIEW

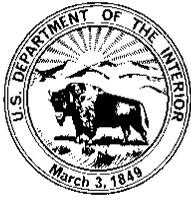
The State of Ohio
Monroe County
Ohio Township

NAD 1983 UTM Zone 17N
Meter
Transverse Mercator
North American 1983

Date: 10/15/2024
Author: CNR
Prj: 254633, Arkon Station

Arkon Station Project

Project Location



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



November 7, 2024

Project Code: 2025-0003763

Dear Daniel Ware:

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

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats and northern long-eared bats. If Indiana bats and northern long-eared bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

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

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). 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, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

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

Sincerely,

A handwritten signature in blue ink that reads "Erin Knoll". The signature is written in a cursive style with a large initial "E".

Erin Knoll
Field Office Supervisor

cc: Matthew.Stooksbury@dnr.ohio.gov
Eileen.Wyza@dnr.ohio.gov



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
Phone: (614) 416-8993 Fax: (614) 416-8994

In Reply Refer To:
Project Code: 2025-0003751
Project Name: Arkon Station Project

10/09/2024 14:33:33 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

(614) 416-8993

PROJECT SUMMARY

Project Code: 2025-0003751
Project Name: Arkon Station Project
Project Type: Distribution Line - New Construction - Above Ground
Project Description: Installation of new T-line structure from Hannibal Station to Ormet Station.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.70520215,-80.84616524637019,14z>



Counties: Monroe County, Ohio

ENDANGERED SPECIES ACT SPECIES

There is a total of 11 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

CLAMS

NAME	STATUS
Clubshell <i>Pleurobema clava</i> Population: Wherever found; Except where listed as Experimental Populations No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3789	Endangered
Longsolid <i>Fusconaia subrotunda</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9880	Threatened
Pink Mucket (pearlymussel) <i>Lampsilis abrupta</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7829	Endangered
Round Hickorynut <i>Obovaria subrotunda</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9879	Threatened
Salamander Mussel <i>Simpsonaias ambigua</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6208	Proposed Endangered
Sheepnose Mussel <i>Plethobasus cyphus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6903	Endangered
Snuffbox Mussel <i>Epioblasma triquetra</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4135	Endangered

INSECTS

NAME	STATUS
<p>Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743</p>	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Daniel Ware
Address: 6530 W. Campus Oval
Address Line 2: Suite 200
City: New Albany
State: OH
Zip: 43054
Email: daniel.ware@powereng.com
Phone: 3045502882

**Appendix D Federal and State Threatened or Endangered Species
Table**

Common/Scientific Names	State Listed Status	Federally Listed Status	Agency Comments	Potential Impacts and Avoidance Dates
Clubshell/ <i>Pleurobema clava</i>	E	E	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Longsolid/ <i>Fusconaia subrotunda</i>	E	T	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable nesting habitat was not observed within the Survey Area.
Pink Mucket (pearlymussel)/ <i>Lampsilis abrupta</i>	E	E	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Round Hickorynut/ <i>Obovaria subrotunda</i>	T	T	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Salamander Mussel/ <i>Simpsonia ambigua</i>	T	PE	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Sheepnose Mussel/ <i>Plethobasus cyphus</i>	E	E	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Snuffbox Mussel/ <i>Epioblasma triquetra</i>	E	E	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Treehorn Wartyback/ <i>Obliquaria reflexa</i>	SC	n/a	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

Common/ <i>Scientific Names</i>	State Listed Status	Federally Listed Status	Agency Comments	Potential Impacts and Avoidance Dates
Indiana bat/ <i>Myotis sodalis</i>	E	E	<p>ODNR/USFWS: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15.</p> <p>ODNR - If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.</p>	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.
Northern long-eared bat/ <i>Myotis septentrionalis</i>	E	E	<p>ODNR/USFWS: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15.</p> <p>ODNR- If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.</p>	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.

Common/Scientific Names	State Listed Status	Federally Listed Status	Agency Comments	Potential Impacts and Avoidance Dates
Little brown bat/ <i>Myotis lucifugus</i>	E	n/a	ODNR: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.
Tricolored bat/ <i>Perimyotis subflavus</i>	E	PE	ODNR: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.
Monarch Butterfly/ <i>Danaus plexippus</i> *	n/a	PT	USFWS: Due to the project, type, size, and location, USFWS does not anticipate adverse effects to this species.	Suitable foraging and migrating habitat may be present in areas not frequently mowed. Conservation measures, including avoidance dates, have not been provided by USFWS.

Common/Scientific Names	State Listed Status	Federally Listed Status	Agency Comments	Potential Impacts and Avoidance Dates
Tippecanoe Darter/ <i>Etheostoma tippecanoe</i>	SC	n/a	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Channel Darter/ <i>Percina copelandi</i>	T	n/a	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
River Darter/ <i>Percina shumardi</i>	T	n/a	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
American eel/ <i>Anguilla rostrata</i>	T	n/a	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Eastern hellbender/ <i>Cryptobranchus alleganiensis alleganiensis</i>	E	n/a	ODNR: Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Ohio Lamprey/ <i>Ichthyomyzon bdellium</i>	E	n/a	ODNR: Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Northern harrier/ <i>Circus hudsonius</i>	E	n/a	ODNR: If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

Status Key: E=Endangered; T=Threatened, PE= Proposed Endangered , SC=Species of Concern, PT=Proposed Threatened
 * The USFWS published into the Federal Register their proposal to list the monarch butterfly as threatened on December 12, 2024.

Appendix E Ecological Survey Report



POWER ENGINEERS, INC.

6530 W. CAMPUS OVAL
SUITE 200
NEW ALBANY, OH 43054 USA

PHONE 614-502-3900

January 16, 2025

Mr. Jonathon Rose
American Electric Power
8600 Smith's Mill Road
New Albany, OH 43054

**Subject: Hannibal-Ormet 138-kV TLE Project
Ohio Township, Monroe County, Ohio
Ecological Survey Report**

Dear Mr. Rose:

This report summarizes the results of the wetland and stream assessment and threatened and endangered species assessment conducted by POWER Engineers, Inc. (POWER) for American Electric Power's (AEP's) proposed Hannibal-Ormet 138-kV TLE Project (Project) located in Ohio Township, Monroe County, Ohio. A Project Location Map is included as Figure 1.

The Project includes installing new transmission line structures from the Ormet Substation to the new Bitdeer Substation to improve customer reliability.

AEP retained POWER to determine the boundaries and limits of streams, wetlands, and other aquatic resources at the site, as well as provide a qualitative assessment and opinion on potential jurisdiction of identified aquatic resources (based on current state and federal regulations) and characterize existing site conditions. Field surveys were performed within a 7.29-acre survey area (Survey Area) adjacent to the existing Ormet and Hannibal Substations. The findings and results of the on-site assessment are described below.

Methodology

Prior to the field survey, hydrologic resource mapping, including Federal Emergency Management Agency (FEMA) regulated floodplains, National Hydrography Dataset (NHD) streams, and National Wetlands Inventory (NWI) data, are reviewed within the vicinity of survey areas (Figure 2 at the end of this report). NWI riverine lines are typically excluded in order to review more comprehensive NHD streamlines.

A Global Positioning System capable of sub-meter accuracy is used to determine boundaries of all identified aquatic resources and other salient features. On-site evaluations are conducted during suitable conditions and avoided when conditions are unsafe or limit the ability to identify aquatic features (e.g., severe storms or accumulated snow). However, field surveys are conducted throughout the year when feasible and may occur during non-optimal conditions (e.g., rain or drought). The Antecedent Precipitation Tool was used to provide a standardized methodology for evaluating normal precipitation conditions in the Project area at the time of survey. This tool provides an assessment of

WWW.POWERENG.COM

January 16, 2025

the presence or absence of drought conditions, as well as the approximate dates of the wet and dry seasons, for a given location.

During field surveys, the Ohio Environmental Protection Agency's (OEPA's) *Ohio Rapid Assessment Method* is used to evaluate the quality and function of identified wetlands. The OEPA's *Headwater Habitat Evaluation Index* is used to assess streams with drainage areas less than 1.0 square mile or natural pool depths less than 40 centimeters, while the OEPA's *Qualitative Habitat Evaluation Index* is used to assess streams with drainage areas greater than 1.0 square mile or natural pool depths greater than 40 centimeters.

Wetlands are lands that have a predominance of hydric soils, hydrophytic vegetation, and prolonged soil saturation or inundation. Locations of wetland determination data points are selected in accordance with procedures outlined in the United States Army Corps of Engineers' (USACE's) 1987 *Corps of Engineers Wetlands Delineation Manual* and the USACE's 2012 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountain and Piedmont Region* (Version 2.0). Paired data points (i.e., one wetland data point [WDP] and one upland data point [UDP]) are collected for each wetland and any additional wetland components (i.e., Cowardin classifications). However, in some cases, one UDP may be used for multiple wetlands or wetland components if the UDP is in proximity to both features. Additional UDPs may be collected to document site conditions in areas considered to have potential for wetland development. Wetlands are classified, in accordance with the *Classification of Wetlands and Deepwater Habitats of the United States*, by identifying the dominant life form of the vegetation (i.e., > 30%) or the physiography and composition of the substrate.

Identification of streams are based on observations of defined bed and bank or other ordinary high-water mark (OHWM) indicators, as defined in the USACE Regulatory Guidance Letter 05-05 and are classified in accordance with the USACE Jurisdictional Determination Form Instructional Guidebook. Stream extents are collected at the identified OHWM along each bank for channels averaging at or over four feet wide and along the thalweg for channels averaging under four feet wide. POWER biologists characterize the flow regime of identified streams based upon field observations and desktop review. Noted flow regimes are generally based on the following:

- Ephemeral streams are non-relatively permanent waters, which are precipitation dependent and carry water only during and immediately after periods of rainfall or snowmelt; and are characterized as having a well-defined channel with no significant habitat for aquatic fauna.
- Intermittent streams are relatively permanent (RPWs) that carry water for extended periods of time but cease to flow occasionally or seasonally during periods of low precipitation or drought. Signs of seasonal flow include scouring, sediment deposits, undercut banks, and/or isolated pools that may support aquatic life.

- Perennial streams are RPWs that typically carry water throughout the year except during extreme drought. Pool depths may be deeper compared to intermittent streams and will often have evidence of aquatic fauna such as macroinvertebrates and fish.

Delineated wetland and stream resources are given an identifier based on the order of delineation in the field. For example, a wetland with the identifier “WET-01” equates to WET (wetland) -01 (number assigned to the first resource identified). Similarly, delineated streams are given the identifier STRM and numbered in a similar manner as wetlands. WDPs and associated UDPs are assigned the same identifier as the corresponding wetland. If POWER identified multiple wetland components (i.e., classification) for a feature, an additional identifier (-a, -b, etc.) is used for each component. Additional UDPs may be collected to document site conditions and at potentially suitable locations for wetland development based on field observations and/or desktop analysis, and are assigned a letter value (-A, -B, etc.) to indicate they are not associated with any potentially jurisdictional wetlands.

POWER’s current professional opinion on the jurisdictional status of identified wetlands, streams, and other features is based upon the Pre-2015 Regulatory Regime Consistent with the Sackett decision, which includes the United States Environmental Protection Agency (USEPA) pre-2015 definition of waters of the United States (WOTUS) that was implemented consistent with applicable case law and longstanding practice and modified due to Sackett vs. the USEPA, which was decided by the United States Supreme Court on May 25, 2023. POWER considered the effects of the decision when examining waters and making recommendations on their jurisdictional status. Those recommended as USACE-jurisdictional include all waters with the potential to meet the relatively permanent standard (i.e., intermittent, and perennial streams) and those wetlands that exhibit a continuous surface connection (e.g., stream, ditch, swale) to a RPW that is connected to a Traditional Navigable Water (TNW). It is important to note that an official determination of the limits and jurisdictional status of on-site features is under the purview of the USACE and can only be made by the USACE or the USEPA. This may require an on-site inspection with USACE representatives to provide an official jurisdictional determination. Additionally, ephemeral streams are not regulated by the OEPA; however, wetlands determined to be isolated may be considered waters of the State and regulated by the OEPA.

Results

Wetland and Stream Assessment

On October 11, 2024, POWER biologists performed an on-site determination to identify boundaries of streams, wetlands, and other aquatic resources and assess existing habitat within the Survey Area. The field-collected resource locations and data points, as well as NHD streams and waterbodies, regulated floodplains, NWI wetlands, and the Survey Area, are depicted in Figure 2. NWI and NHD data have been excluded from the Survey Area in order to display the delineated aquatic resources.

January 16, 2025

POWER biologists did not observe any streams or wetlands within the Survey Area (Figure 2); however, one UDP was collected to document existing conditions. Data obtained for the upland area indicate that soils, vegetation, and hydrology parameters did not collectively meet the criteria established by the USACE for identifying wetland resources. Representative photographs and corresponding upland data forms are included in Appendix A. Results of the USACE Antecedent Precipitation Tool analysis are included in Appendix B.

POWER biologists identified two man-made drainage and stormwater ditches within the Survey Area (Figure 2). The features did not exhibit a defined bed and bank as defined in the USACE Regulatory Guidance Letter 05-05. Based on field observations, these features appear to have been excavated wholly in upland areas and do not provide a connection from upslope aquatic resources to other downslope streams or wetlands; therefore, it is POWER's professional opinion the features are likely not regulated by the USACE or the state of Ohio.

Rare, Threatened, and Endangered Species Habitat Assessment

POWER submitted a technical review letter to the Ohio Department of Natural Resources (ODNR) and the United States Fish and Wildlife Service (USFWS) requesting information on any known occurrences of federally or state-listed threatened or endangered species, or any areas of designated critical habitat, within a 0.5-mile radius of the Project on October 25, 2024.

POWER received a response from the USFWS on November 7, 2024, indicating that due to the project, type, size, and location, the USFWS does not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. Additionally, POWER received a response from the ODNR on November 21, 2024, providing several comments that are provided in Table 1. A copy of the agency responses are included in Appendix C.

During the on-site assessment for wetlands and streams, POWER biologists performed a cursory visual assessment of the Survey Area for any potential protected species habitat, rare or unique habitats, and migratory bird nests. During the habitat assessment, POWER did not observe any migratory bird nests or trees within the Survey Area. Additionally, no caves or mine portals were observed within the Survey Area, and a review of ODNR Mines of Ohio and Karst Interactive Map Viewers indicate no records of either within 0.25 mile of the Survey Area. No other state or federally listed species habitat and unique habitats were observed during the cursory on-site habitat assessment.

Summary and Recommendations

POWER biologists did not observe wetlands or streams within the Survey Area.

No trees or migratory bird nests were observed; as such, adverse impacts to bats or migratory bird nests are not anticipated as a result of the Project. No other state or federally listed species habitat was observed during the on-site assessment.

January 16, 2025

This report summarizes the results of the on-site determination conducted for streams, wetlands, and other aquatic resources for the proposed Hannibal-Ormet 138-kV TLE Project. Information contained within this report reflects the professional opinion of POWER and is based upon methods accepted by the USACE to identify regulated wetlands and streams.

Sincerely,



Daniel Ware
Natural Resource Technical Lead
POWER Engineers, Inc.

Attachments:

Figure 1 – Project Location Map
Figure 2 – Resource Location Map
Appendix A – Upland Data
Appendix B – USACE Antecedent Precipitation Tool Analysis
Appendix C – Agency Correspondence

TABLE 1 THREATENED AND ENDANGERED SPECIES TABLE

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Clubshell/ <i>Pleurobema clava</i>	E	E	Small to medium streams with gravel/sand substrate and relatively little silt.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Longsolid/ <i>Fusconaia subrotunda</i>	E	T	Small streams to large rivers, and prefers a mixture of sand, gravel, and cobble substrates.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable nesting habitat was not observed within the Survey Area.
Pink Mucket (pearlymussel)/ <i>Lampsilis abrupta</i>	E	E	Can be found on the bottoms of various bodies of water and large rivers, among gravel and cobble.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Round Hickorynut/ <i>Obovaria subrotunda</i>	T	T	Small streams to large rivers, and prefers a mixture of sand, gravel, and cobble stream bottoms.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Salamander Mussel/ <i>Simpsonaias ambigua</i>	T	PE	Inhabits swift-flowing rivers and streams with areas of shelter under rocks or in crevices	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Sheepnose Mussel/ <i>Plethobasus cyphus</i>	E	E	Medium to large stream systems, typically within shallow shoal habitats with moderate to swift currents over mixtures of coarse sand, gravel and clay	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Snuffbox Mussel/ <i>Epioblasma triquetra</i>	E	E	Sand, gravel, or cobble substrates in swift small and medium-sized rivers as well as riffles and shoals of rocky rivers, and the shores of lakes with wave activity.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Treehorn Wartyback/ <i>Obliquaria reflexa</i>	SC	n/a	Medium to large rivers with slackwater conditions to swift currents, and substrates of gravel to muddy sand.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Indiana bat/ <i>Myotis sodalis</i>	E	E	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark on dead or dying trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR/USFWS: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. ODNR - If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.

COMMON/SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Northern long-eared bat/ <i>Myotis septentrionalis</i>	E	E	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark on dead or dying trees or in crevices and cavities of trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR/USFWS: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. ODNR- If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Little brown bat/ <i>Myotis lucifugus</i>	E	n/a	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark on dead or dying trees or in cracks or crevices of trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Tricolored bat/ <i>Perimyotis subflavus</i>	E	PE	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark and among leaf clusters on dead or dying trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.
Monarch Butterfly/ <i>Danaus plexippus</i> *	n/a	PT	Fields, roadside areas, open areas, or wet areas that support milkweed and flowering plants for food and egg laying. Overwintering habitat include moderate temperatures to avoid freezing.	No	USFWS: Due to the project, type, size, and location, USFWS does not anticipate adverse effects to this species.	Suitable foraging and migrating habitat may be present in areas not frequently mowed. Conservation measures, including avoidance dates, have

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
						not been provided by USFWS.
Tippecanoe Darter/ <i>Etheostoma tippecanoe</i>	SC	n/a	Medium to large streams and rivers in riffles of moderate current with a substrate of gravel and small cobble sized rock	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Channel Darter/ <i>Percina copelandi</i>	T	n/a	Rivers and large creeks in areas of moderate current over sand and gravel substrates. It also occurs in wave swept nearshore areas of lakes in coarse-sand, fine-gravel beach, and sandbar habitats.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
River Darter/ <i>Percina shumardi</i>	T	n/a	Rivers and large streams, preferring deep, fast-flowing riffles with cobble and boulder substrates.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
American eel/ <i>Anguilla rostrata</i>	T	n/a	Primarily live in rivers and estuaries among tree snags, plants, and other types of shelters found close to shore.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

COMMON/ SCIENTIFIC NAMES	STATE LISTED STATUS	FEDERALLY LISTED STATUS	TYPICAL HABITAT DESCRIPTION ¹	HABITAT OBSERVED IN SURVEY AREA ²	AGENCY COMMENT (APPENDIX D)	POTENTIAL IMPACTS AND AVOIDANCE DATES
Eastern hellbender/ <i>Cryptobranchus alleganiensis alleganiensis</i>	E	n/a	Perennial streams with large flat rocks.	No	ODNR: Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Ohio Lamprey/ <i>Ichthyomyzon bdellium</i>	E	n/a	Three distinctly different habitats that are connected by free flowing (free of dams) stretches of streams. Spawning adults are found in clear brooks with fast flowing water and either sand or gravel bottoms. Juveniles are found in slow moving water buried in soft substrate of medium to large streams, and adults are found in large bodies of water.	No	ODNR: Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Northern harrier/ <i>Circus hudsonius</i>	E	n/a	Large marshes and grasslands for breeding grounds, and grasslands for hunting.	No	ODNR: If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

Status Key: E=Endangered; T=Threatened, PE= Proposed Endangered , SC=Species of Concern, PT=Proposed Threatened

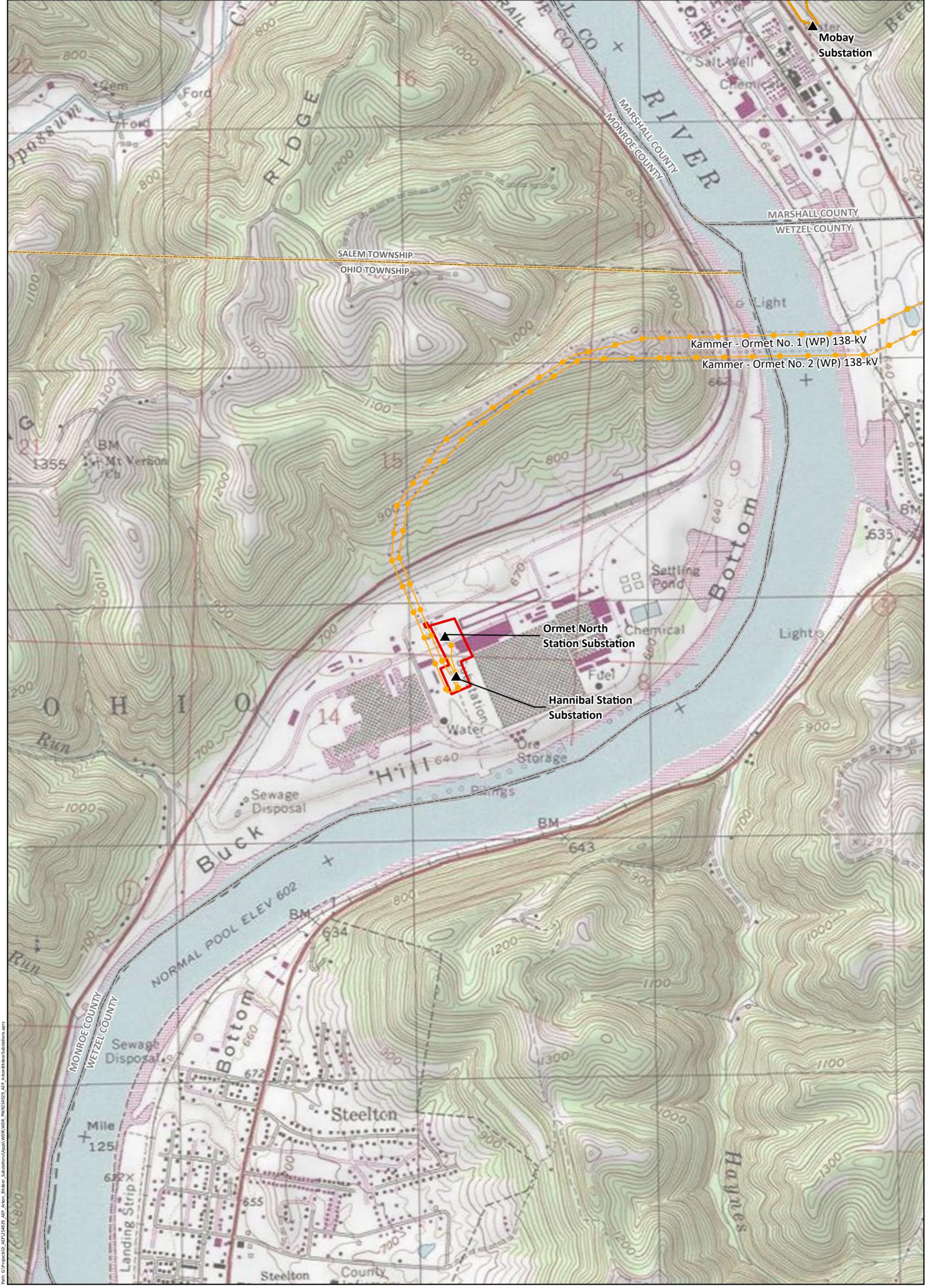
¹ Habitat descriptions sourced from multiple resources, including ODNR, United States Forest Service, USFWS, Michigan Natural Features Inventory, and Illinois State Museum.

² Represents the opinion of POWER biologists based on site conditions at time that aquatic resources delineations were completed.

* The USFWS published into the Federal Register their proposal to list the monarch butterfly as threatened on December 12, 2024.

January 16, 2025

FIGURE 1 PROJECT LOCATION MAP



Path: C:\Project310_AEP\1254929_AEP_Akron\Bidders\Substation\Map\WDR\WDR_PWS1254929_AEP_AkronBiddersSubstations.aprx

	Survey Area
	Existing Substation
	Existing Transmission Line (69-kV or Lower)
	Existing Transmission Line (138-kV - 345-kV)
	County Boundary
	Township Boundary

1" = 1200'

0 600 1,200
Feet



Ohio Township
Monroe County,
Ohio

NAD 1983 StatePlane Ohio South FIPS
3402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983

Date: 1/16/2025
Author: creed
Project: 254633

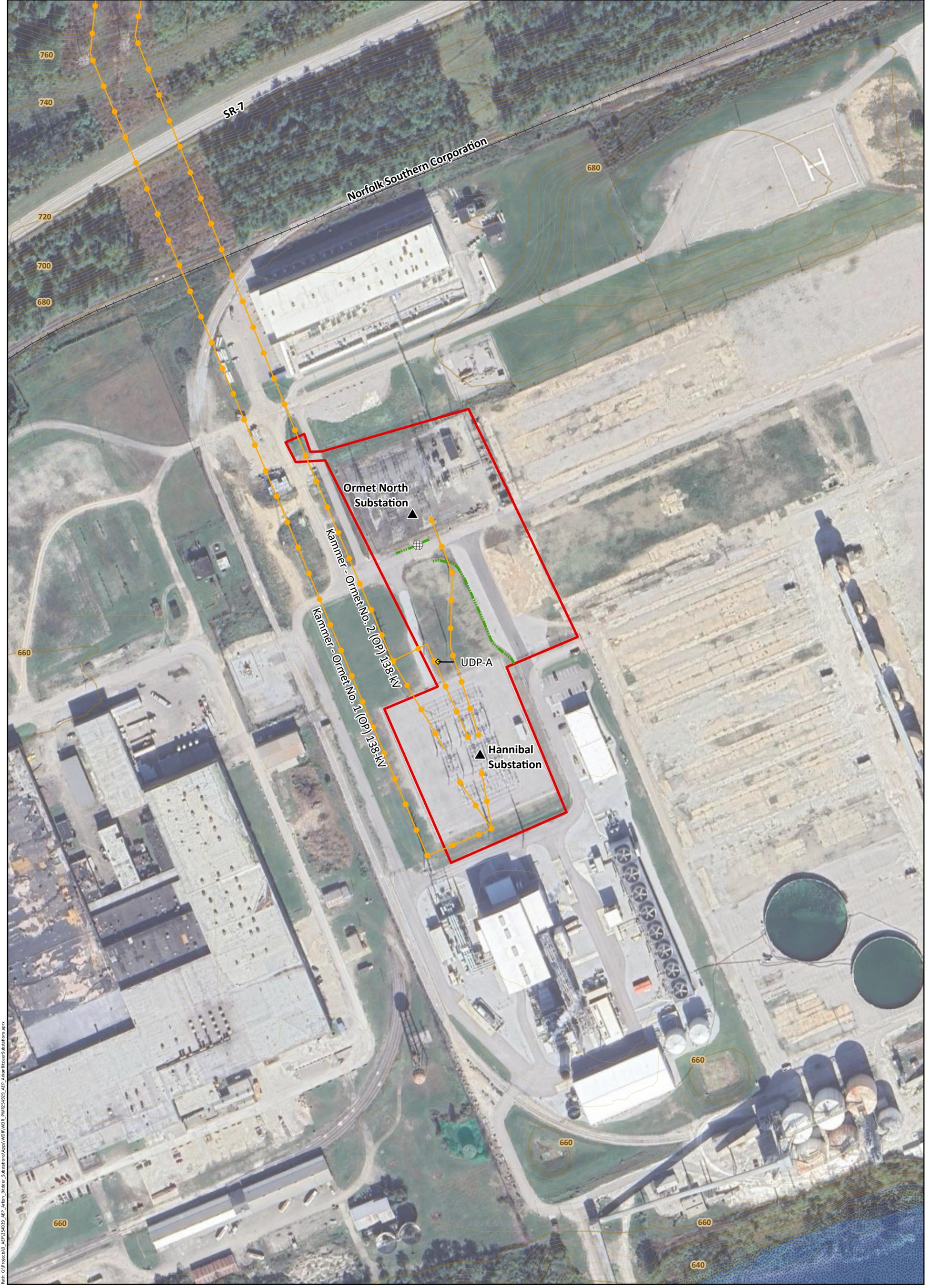
Overview

Hannibal-Ormet 138-kV TLE Project

Figure 1: Project Location

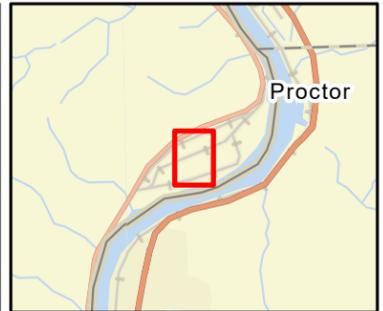
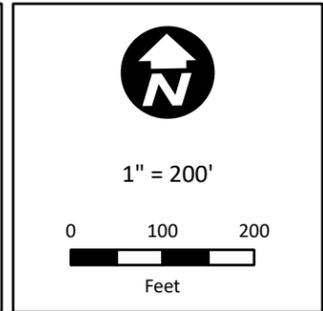
January 16, 2025

FIGURE 2 RESOURCE LOCATION MAP



Path: C:\Project\10_AEP\1254929_AEP_Akron\Bidders\Substations\WDR\WDR_Plan\1254929_AEP_Akron\Bidders\Substations.aprx

	Upland Data Point		Road
	Existing Culvert; Inlet		Railroad
	Delineated Drainage Ditch or Swale		Wetland (NWI)
	Survey Area		Floodplain (FEMA)
	Existing Substation		Floodway (FEMA)
	Existing Transmission Line (138-kV - 345-kV)		Index Contour (10')
			Intermediate Contour (2')



Ohio Township
Monroe County,
Ohio

NAD 1983 StatePlane Ohio South FIPS
3402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983

Date: 1/16/2025
Author: creed
Project: 254633

Map Page
1 of 1

**Hannibal-Ormet
138-kV TLE Project**

Figure 2: Resource Location

January 16, 2025

APPENDIX A UPLAND DATA

WETLAND DETERMINATION DATA FORM - Eastern Mountains and Piedmont Region

Project/Site: Hannibal-Ormet 138-kV TLE City/County: Monroe County Sampling Date: 10/11/2024
 Applicant/Owner: American Electric Power State: OH Sampling Point: UDP-A
 Investigator(s): Margaret Lange and Daniel Ware Section, Township, Range: 14, T2N, R3W
 Landform (hillslope, terrace, etc.): Flat Local relief (concave, convex, none): None Slope (%): 0-1
 Subregion (LRR or MLRA): Central Allegheny Plateau Lat: 39.704495 Long: -80.846300 Datum: _____
 Soil Map Unit Name: Made Land NWI Classification: N/A
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (if no, explain in Remarks.)
 Are Vegetation Yes, Soil Yes, or Hydrology No significantly disturbed? Are "Normal Circumstances" present? Yes X No _____
 Are Vegetation No, Soil No, or Hydrology No naturally problematic? (If needed, explain any answers in Remarks.)

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

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

Remarks: The NWPL 2020 wetland ratings were used.
 This point was determined not to be within a wetland due to the lack of all three wetland criteria.

HYDROLOGY

Wetland hydrology Indicators: <u>Primary Indicators (minimum of one is required; check all that apply)</u> <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> True Aquatic Plants (B14) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> Aquatic Fauna (B13)	<u>Secondary Indicators (minimum of two required)</u> <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)
--	--

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

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

Remarks:
 No positive indication of wetland hydrology was observed.

VEGETATION (Four Strata) - Use scientific names of plants.

Sampling Point: UDP-A

Tree Stratum (Plot size: <u>30 feet</u>)	Absolute % cover	Dominant Species?	Indicator Status
1. <i>None Observed</i>			
2.			
3.			
4.			
5.			
6.			
7.			

50% of total cover: _____ 20% of total cover: _____

Sapling/Shrub Stratum (Plot size: <u>15 feet</u>)	Absolute % cover	Dominant Species?	Indicator Status
1. <i>None Observed</i>			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			

50% of total cover: _____ 20% of total cover: _____

Herb Stratum (Plot size: <u>5 feet</u>)	Absolute % cover	Dominant Species?	Indicator Status
1. <i>Poa pratensis</i>	20	Yes	FACU
2. <i>Echinochloa crus-galli</i>	30	Yes	FAC
3. <i>Symphotrichum pilosum</i>	10	No	FAC
4. <i>Digitaria sanguinalis</i>	10	No	FACU
5.			
6.			
7.			
8.			
9.			
10.			
11.			

70 = Total Cover
50% of total cover: 35.00 20% of total cover: 14.00

Woody Vine Stratum (Plot size: <u>15 feet</u>)	Absolute % cover	Dominant Species?	Indicator Status
1. <i>None Observed</i>			
2.			
3.			
4.			
5.			

50% of total cover: _____ 20% of total cover: _____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>0</u>	x 2 = <u>0</u>
FAC species <u>40</u>	x 3 = <u>120</u>
FACU species <u>30</u>	x 4 = <u>120</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>70</u> (A)	<u>240</u> (B)

Prevalence Index = B/A = 3.43

- Hydrophytic Vegetation Indicators:**
- 1 - Rapid Test for Hydrophytic Vegetation
 - 2 - Dominance Test is >50%
 - 3 - Prevalence Index is ≤ 3.0¹
 - 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)
- Problematic Hydrophytic Vegetation¹ (Explain)
- ¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree - Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub - Woody plants, excluding woody vines, less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vine - All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present?

Yes	No
_____	<u>X</u>

Remarks: (Include photo numbers here or on a separate sheet.)

No positive indication of hydrophytic vegetation was observed.

Vegetation has been disturbed by routine mowing

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-3	10YR 3/3	100	None	—	—	—	loam	shovel refusal due to gravel

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soils Indicators:

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

- Dark Surface (S7)
- Polyvalue Below Surface (S8) (MLRA 147, 148)
- Thin Dark Surface (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136)
- Umbric Surface (F13) (MLRA 136, 122)
- Piedmont Floodplain Soils (F19) (MLRA 148)
- Red Parent Material (F21) (MLRA 127, 147)

Indicators for Problematic Hydric Soils³:

- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

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

Restrictive Layer (if observed):

Type: _____
 Depth (inches): _____

Hydric Soil Present? Yes _____ No **X** _____

Remarks:

No positive indication of hydric soils was observed.
 Soil has been disturbed by previous construction activities



Facing North



Facing East



Facing South



Facing West



View of Soil Profile

Client Name: AEP

Date: October 11, 2024

Description: Ditch 01



Date: October 11, 2024

Description: Swale 01

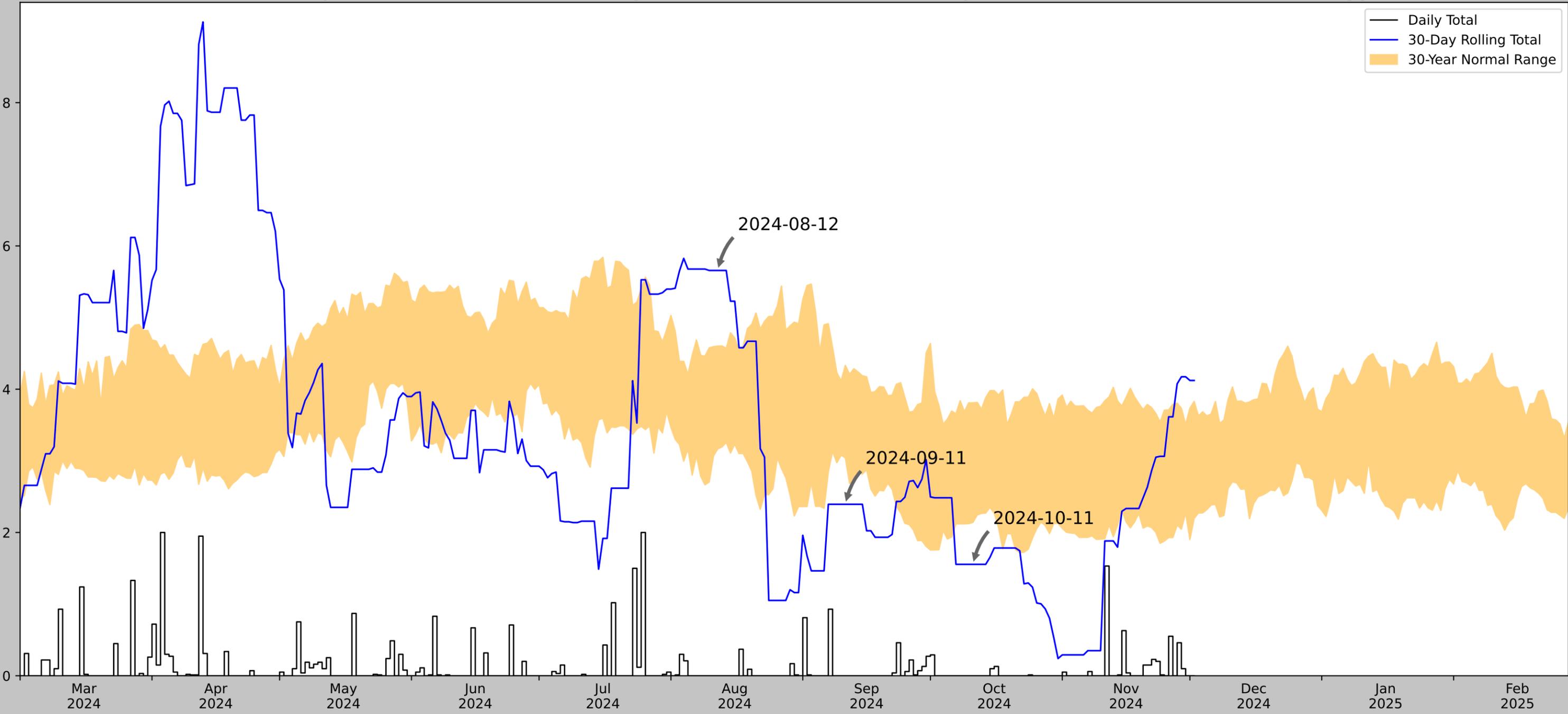


January 16, 2025

APPENDIX B USACE ANTECEDENT PRECIPITATION TOOL ANALYSIS

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network

Rainfall (Inches)



Coordinates	39.704498, -80.846301
Observation Date	2024-10-11
Elevation (ft)	665.166
Drought Index (PDSI)	Severe drought
WebWIMP H ₂ O Balance	Wet Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2024-10-11	2.142126	3.809449	1.555118	Dry	1	3	3
2024-09-11	3.042913	4.33189	2.393701	Dry	1	2	2
2024-08-12	3.166536	4.602362	5.65748	Wet	3	1	3
Result							Drier than Normal - 8



Figures and tables made by the
Antecedent Precipitation Tool
Version 2.0

Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and
Development Center



Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
HANNIBAL LOCKS & DAM	39.6667, -80.8667	620.079	2.828	45.087	1.4	11306	90
SISTERSVILLE 6.1 ESE	39.537, -80.888	734.908	9.033	114.829	5.102	1	0
MOUNDSVILLE	39.9056, -80.755	620.079	17.539	0.0	7.893	44	0
MIDDLEBOURNE 3.2 ESE	39.47, -80.8571	761.155	13.6	141.076	8.039	2	0

January 16, 2025

APPENDIX C AGENCY COORDINATION



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
Phone: (614) 416-8993 Fax: (614) 416-8994

In Reply Refer To:
Project Code: 2025-0003751
Project Name: Arkon Station Project

10/09/2024 14:33:33 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

(614) 416-8993

PROJECT SUMMARY

Project Code: 2025-0003751
Project Name: Arkon Station Project
Project Type: Distribution Line - New Construction - Above Ground
Project Description: Installation of new T-line structure from Hannibal Station to Ormet Station.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.70520215,-80.84616524637019,14z>



Counties: Monroe County, Ohio

ENDANGERED SPECIES ACT SPECIES

There is a total of 11 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

CLAMS

NAME	STATUS
Clubshell <i>Pleurobema clava</i> Population: Wherever found; Except where listed as Experimental Populations No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3789	Endangered
Longsolid <i>Fusconaia subrotunda</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9880	Threatened
Pink Mucket (pearlymussel) <i>Lampsilis abrupta</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7829	Endangered
Round Hickorynut <i>Obovaria subrotunda</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9879	Threatened
Salamander Mussel <i>Simpsonaias ambigua</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6208	Proposed Endangered
Sheepnose Mussel <i>Plethobasus cyphus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6903	Endangered
Snuffbox Mussel <i>Epioblasma triquetra</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4135	Endangered

INSECTS

NAME	STATUS
<p>Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743</p>	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Daniel Ware
Address: 6530 W. Campus Oval
Address Line 2: Suite 200
City: New Albany
State: OH
Zip: 43054
Email: daniel.ware@powereng.com
Phone: 3045502882

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



November 7, 2024

Project Code: 2025-0003751

Dear Daniel Ware:

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

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

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

Sincerely,

Erin Knoll
Field Office Supervisor



Office of Real Estate & Land Management

Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

November 21, 2024

Daniel Ware
Power Engineers, Inc.
6530 W. Campus Oval Road, Suite 200
New Albany, Ohio 43054

Re: 24-1652 - Akron Station

Project: The proposed project involves the installation of new transmission line structures from the Hannibal Station to the Ormet Station.

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

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

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

Tippecanoe Darter (*Etheostoma tippecanoe*), SC
Channel Darter (*Percina copelandi*), T
River Darter (*Percina shumardi*), T
Threehorn Wartyback (*Obliquaria reflexa*), SC

Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened. The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Features searched include locations of rare and endangered plants and animals determined to be of value to the conservation of their species, high quality plant communities, animal breeding assemblages, and outstanding geological features.

The species listed above are recorded within the boundaries of the specified project area. Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources.

Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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

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

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

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

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

This project must not have an impact on native mussels. This applies to both listed and non-listed species, as all species of mussel are protected in Ohio. Per the Ohio Mussel Survey Protocol (2022), 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. 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, 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](#). If there is no in-water work proposed, impacts to mussels are not likely.

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

State Endangered

Ohio lamprey (*Ichthyomyzon bdellium*)

State Threatened

American eel (*Anguilla rostrata*)

channel darter (*Percina copelandi*)

river darter (*Percina shumardi*)

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

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species.

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

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

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

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

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

Expiration: *ODNR Environmental Reviews are typically valid for 2 years from the issuance date. If the scope of work, project area, construction limits, and/or anticipated impacts to natural resources have changed significantly from the original project submittal, then a new Environmental Review request should be submitted.*