CONSTRUCTION NOTICE FOR
MT. VERNON-SOUTH KENTON STRUCTURE RAISE
PROJECT

PUCO Case No. 18-1059-EL-BNR

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

Submitted by:  
AEP Ohio Transmission Company, Inc.

August 22, 2018
AEP Ohio Transmission Company, Inc.’s Mt. Vernon-South Kenton Structure Raise Project

4906-6-05

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

4906-6-05(B) General Information

B(1) Project Description

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

AEP Ohio Transco proposes the Mt. Vernon-South Kenton Structure Raise Project (“Project”), located in Pleasant Township, Marion County, Ohio. The purpose of the Project is to raise current structure heights to accommodate the rebuild of the Harpster-Waldo 69kV transmission line (PJM supplemental project S1564) that runs under the West Mt. Vernon-South Kenton 138kV line. The Project involves replacing three wood pole H-frame 138kV structures with one steel H-frame and two steel three-pole configuration structures over a distance of approximately 0.27 miles. Figure 1 shows the Project area.

The Project meets the requirements for a Construction Notice (“CN”) because it is within the types of projects defined by (1)(a) of Appendix A to O.A.C. 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. 18-1059-EL-BNR

B(2) Statement of Need

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

This Project is necessary to accommodate the rebuild of an existing 69kV line over which the West Mt Vernon – South Kenton 138kV line crosses. The proposed structure changes are necessary in order to provide proper clearances for the rebuild of the Harpster-Waldo 69kV transmission line.
B(3) Project Location
The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the Project area.

Appendix A show the location of the Project in relation to the 69kV line to be rebuilt.

B(4) Alternatives Considered
The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

A siting review was conducted by the Project team to determine if any modification to the existing alignments of either the Mt. Vernon-South Kenton 138 kV line or Harpster-Waldo 69kV transmission line would be necessary to accommodate the crossing of the two lines. By rebuilding the 69kV line and replacing the existing 138kV structures on centerline, impacts to the footprint of this area were minimized. All poles have been specifically positioned to minimize the need for structures to be located in a wetland or floodplain. The resulting right-of-way (“ROW”) represents the most suitable and least-impact alternative.

B(5) Public Information Program
The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

AEP Ohio Transco maintains a website (http://aeptransmission.com/ohio/) on which an electronic copy of this CN is available. A paper 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 the first quarter of 2019, and the anticipated in-service date will be approximately January 2019.

B(7) Area Map
The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Figure 1 provides a topographic map of existing and proposed facilities at 1:24,000, and Figure 2 provides an aerial map showing roads and highways, clearly marked with Project components. To access the Project location from Columbus, take I-70E/I-71 N towards Wheeling, follow I-71 N to OH-37E/US-36 E/State Rt. 37E in Brekshire Township. Take exit 131 for US-36/OH-37 toward Delaware/Sunbury. Turn left onto OH-37/US-36 E State Rte 37 E. Slight right onto E Central Ave. Turn right to merge onto US-23
N. Turn left onto Bethlehem Rd E. Turn right onto Gooding Road. The Project is approximately two miles north of Bethlehem Road E, on Gooding Road.

**B(8) Property Agreements**

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

AEP Ohio will supplement its rights under existing blanket easements associated with the parcels below.

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<th>Parcels to Obtain Easements</th>
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**B(9) Technical Features**

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

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

The transmission line construction will include the following:

- Voltage: 138kV
- Conductors: 795 kcmil 26/7 ACSR
- Static Wire: #10 Alumoweld
- Insulators: Polymer
- ROW Width: 100 Feet

Structure Types:
- Appendix B Figure 3: Single circuit steel three pole strain structure. Two structures are needed.
- Appendix B Figure 4: Single circuit steel H-Frame structure. One structure is needed.

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

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line.
No occupied residences or institutions are located within 100 feet of the Project.

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

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

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.

AEP Ohio Transco's estimated capital cost for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately $475,000.

B(10) Social and Economic 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 is within Pleasant Township in Marion County, Ohio. An aerial photograph of the Project vicinity is provided as Figure 2. The land within this vicinity is open field and agricultural. The Project is along existing AEP Ohio ROW, with supplemental easements to be obtained. No tree clearing will be necessary for this Project. Residences and commercial structures are not within the area of disturbance. There are also no parks, schools, cemeteries, wildlife management areas, or nature preserve lands within the area of disturbance.

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 area is approximately three acres in size and is primarily agricultural land bisected by the Gooding Road right-of-way. The agricultural parcels appear to be used for row crops. The Marion County Auditor was contacted, and both parcels are registered as agricultural district land. Impacts to agricultural land, and agricultural district, are expected to be temporary during construction. As the Project falls within an existing ROW, no new impacts to agricultural activities are anticipated.
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.

A cultural report was completed and will be coordinated directly with the OPSB.

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.

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

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

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

AEP Ohio Transco’s consultant prepared a Wetland Delineation and Stream Assessment report that included consultation and habitat review for special status species. This report is included as Appendix C. No impacts to federal or state designated species are 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.

No areas of ecological concern were identified within the Project area. AEP Ohio Transco’s consultant prepared a Wetland Delineation and Stream Assessment Report, included as Appendix C.
B(10)(g) Unusual Conditions

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

To the best of AEP Ohio Transco's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.
Appendix A  Project Maps

Figures 1, 2
FIGURE 1
PROJECT OVERVIEW

LEGEND:

- Project Location
- Existing Transmission Line
- Mount Vernon-South Kenton 138 kV Transmission Line
- Harpster Pumping-Waldo 69 kV Transmission Line
- USGS 7.5" Topographical Quadrangle

Base Map: http://goto.arcgisonline.com/maps/USA_Topo_Maps

Mount Vernon-South Kenton 138 kV Transmission Line

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CHECKED BY: AG
JOB NO: 60538239
FIGURE 2
AERIAL PHOTOGRAPH OF THE PROJECT VICINITY

LEGEND:

- Existing Transmission Line
- Mount Vernon-South Kenton 138 kV Transmission Line
- Harpster Pumping-Waldo 69 kV Transmission Line
- Project
- Marion County Parcel Boundary

Base Map: http://goto.arcgisonline.com/maps/USA_Topo_Maps

Mount Vernon-South Kenton 138 kV Transmission Line

Date Saved: 5/30/2018
CREATED BY: BAW
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Appendix B  Structure Diagrams

Figures 3, 4
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<td>2</td>
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<td>A449 1IN - HIGH STRENGTH DOUBLE ARMING BOLT, CONCRETE OR STEEL</td>
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**Diagram:**

- **Transmitting Line Standards:**
  - POLYMER - 138KV LIGHT SUSPENSION
  - W/CORONA RING
  - H-FRAME, GALVANIZED STEEL

**Notes:**

- American Electric Power Company, Inc. disclaims any and all warranties with respect to the accuracy or use of this drawing, whether expressed or implied, including specifically the implied warranties of merchantability and fitness for a particular purpose. This drawing is provided "as is," and the user agrees that it assumes all risks of its use, quality, and performance.

**Revision:**

- **REV:** 1
- **DESCRIPTION:** REVISED BILL OF MATERIAL
- **BY:** McP
- **DATE:** 04/30/15

**Drawing Information:**

- **DRAWING No:** CS45-2468
- **SHEET No:** 1
- **REV. No:** 1
MOUNT VERNON TO SOUTH KENTON 138KV REBUILD PROJECT, MARION COUNTY, OHIO

WETLAND DELINEATION AND STREAM ASSESSMENT REPORT

Prepared for:
American Electric Power Ohio Transmission Company
700 Morrison Road
Gahanna, Ohio 45230

Prepared by:
AECOM
525 Vine Street, Suite 1800
Cincinnati, Ohio 45202

Project #: 60538239

June 2018
TABLES

Number

TABLE 1 SOIL MAP UNITS AND DESCRIPTIONS WITHIN THE MOUNT VERNON TO SOUTH KENTON 138 KV ELECTRIC TRANSMISSION LINE PROJECT SURVEY CORRIDOR
TABLE 2 VEGETATIVE COMMUNITIES WITHIN THE PROJECT CORRIDOR
TABLE 3 ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT CORRIDOR

FIGURES

Number

FIGURE 1 OVERVIEW MAP
FIGURE 2 SOIL MAP UNIT AND NATIONAL WETLAND INVENTORY MAP
FIGURE 3 VEGETATIVE COMMUNITIES ASSESSMENT MAP

APPENDICES

Number

APPENDIX A CORRESPONDENCE LETTERS FROM USFWS AND ODNR
### List of Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tr>
<td>AEP Ohio Transco</td>
<td>American Electric Power Ohio Transmission Company</td>
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<tr>
<td>FAC</td>
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</tr>
<tr>
<td>FACU</td>
<td>Facultative upland</td>
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<td>FACW</td>
<td>Facultative wetland</td>
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<tr>
<td>GPS</td>
<td>Global Positioning System</td>
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<td>Ohio Department of Natural Resources</td>
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<td>Ohio Rapid Assessment Method</td>
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<td>Qualitative Habitat Evaluation Index</td>
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1.0 INTRODUCTION

American Electric Power Ohio Transmission Company's (AEP Ohio Transco) is proposing to rebuild a 0.3-mile long portion of the existing Mount Vernon to South Kenton 138 kV electric transmission line in concurrence with the Harpster-Waldo 69 kV rebuild in Marion County, Ohio ("Project"). This report only describes the potential rebuild portion of the Mount Vernon to South Kenton 138 kV electric transmission line. The proposed Project is illustrated on Figure 1.

The purpose of the field survey was to assess whether wetlands and other “waters of the U.S.” exist within the 100-foot wide Project survey corridor. Secondarily, land uses were recorded in an effort to classify and characterize potential habitat for rare, threatened, and endangered species. This report will be used to assist AEP Ohio Transco’s efforts to identify potential waters of the U.S. and to avoid or minimize impacts to rare, threatened, and endangered species potentially present within the survey corridor during construction activities.

2.0 METHODOLOGY

Prior to conducting field surveys, digital and published county Natural Resources Conservation Service (NRCS) soil surveys, U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps, and U.S. Geological Survey (USGS) 7.5-minute topographic maps were reviewed as an exercise to identify the occurrence and location of potential wetland areas.

Land uses crossed by the Project survey corridor were assigned a general classification based upon the principal land characteristics of the location as observed through aerial photography review and observations during field surveys. General land use types in the vicinity of the proposed Project include: agricultural fields and urban areas. Agricultural land is the dominant land use in the vicinity of the Project.

From March 15th through March 23rd, 2017, AECOM ecologists walked the Harpster-Waldo Project survey corridor to conduct a wetland delineation and stream assessment. In addition, from May 1 through May 3, 2018, AECOM ecologists surveyed access roads and pull sites for the Harpster-Waldo Project. These surveys included the project area for the Mount Vernon to South Kenton portion of the Project. During the field survey, the physical boundaries of observed water features were recorded using sub-decimeter accurate Trimble Global Positioning System (GPS) units. The GPS data was imported into ArcMap GIS software, where the data was then reviewed and edited for accuracy.

2.1 WETLAND DELINEATION

The Project survey corridor was evaluated according to the procedures outlined in the U.S. Army Corps of Engineers (USACE) 1987 Wetland Delineation Manual (1987 Manual) (Environmental Laboratory, 1987).
and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) (Regional Supplement) (USACE, 2010). The Midwest Regional Supplement was released by the USACE in August 2010 to address regional wetland characteristics and improve the accuracy and efficiency of wetland delineation procedures. The 1987 Manual and Regional Supplement define wetlands as areas that have positive evidence of three environmental parameters: hydric soils, wetland hydrology, and hydrophytic vegetation. Wetland boundaries are placed where one or more of these parameters give way to upland characteristics.

Since quantitative data were not available for any of the identified wetlands, AECOM utilized the routine delineation method described in the 1987 Manual and Regional Supplement that consisted of a pedestrian site reconnaissance, including identifying the vegetation communities, soils identification, a geomorphologic assessment of hydrology, and notation of disturbance. The methodology used to examine each parameter is described in the following sections.

2.1.1 SOILS

Soils were examined for hydric soil characteristics using a spade shovel to extract soil samples. A Munsell Soil Color Chart (Kollmorgen Corporation, 2010) was used to identify the hue, value, and chroma of the matrix and mottles of the soils. Generally, mottled soils with a matrix chroma of two or less, or unmottled soils with a matrix chroma of one or less are considered to exhibit hydric soil characteristics (Environmental Laboratory, 1987). In sandy soils, mottled soils with a matrix chroma of three or less, or unmottled soils with a matrix chroma of two or less are considered to be hydric soils.

2.1.2 HYDROLOGY

The 1987 Manual requires that an area be inundated or saturated to the surface for an absolute minimum of five percent of the growing season (areas saturated between five percent and 12.5 percent of the growing season may or may not be wetlands, while areas saturated over 12.5 percent of the growing season fulfill the hydrology requirements for wetlands). The Regional Supplement states that the growing season dates are determined through onsite observations of the following indicators of biological activity in a given year: (1) above-ground growth and development of vascular plants, and/or (2) soil temperature (12-in. depth) is 41 degree Fahrenheit (°F) or higher as an indicator of soil microbial activity. Therefore, the beginning of the growing season in a given year is indicated by whichever condition occurs earlier, and the end of the growing season by whichever persists later.

The Regional Supplement also states that if onsite data gathering is not practical, the growing season can be approximated by the number of days between the average (five years out of ten, or 50 percent probability) date of the last and first 28°F air temperature in the spring and fall, respectively. The National Weather Service WETS data obtained from the NRCS National Water and Climate Center reveals for
Marion County that in an average year, this period lasts from April 17 to October 25, or 191 days. In the Project corridor in Marion County, five percent of the growing season equates to approximately ten days.

The soils and ground surface were examined for evidence of wetland hydrology in lieu of detailed hydrological data. This is an acceptable approach according to the 1987 Manual and the Regional Supplement. Evidence indicating wetland hydrology typically includes primary indicators such as surface water, saturation, water marks, drift deposits, water-stained leaves, sediment deposits and oxidized rhizospheres on living roots; and secondary indicators such as drainage patterns, geomorphic position, micro-topographic relief, and a positive Facultative (FAC)-neutral test (USACE, 2010).

2.1.3 VEGETATION

Dominant vegetation was visually assessed for each stratum (tree, sapling/shrub, herb and woody vine) and an indicator status of obligate wetland (OBL), facultative wetland (FACW), facultative (FAC), facultative upland (FACU), and/or upland (UPL) was assigned to each plant species based on the U.S. Army Corps of Engineers 2016 National Wetland Plant List: Midwest Region, which encompasses the area of the Project. An area is determined to have hydrophytic vegetation when, under normal circumstances, 50 percent or more of the composition of the dominant species are OBL, FACW and/or FAC species. Vegetation of an area was determined to be non-hydrophytic when more than 50 percent of the composition of the dominant species was FACU and/or UPL species. In addition to the dominance test, the FAC-Neutral test and prevalence tests are used to determine if a wetland has a predominance of hydrophytic vegetation. Recent USACE guidance indicates that to the extent possible, the hydrophytic vegetation decision should be based on the plant community that is normally present during the wet portion of the growing season in a normal rainfall year (USACE, 2010).

At the time of the initial field survey in 2017, the Project survey corridor was observed with near freezing temperatures. Vegetation sampling for wetland delineation can be challenging when some plants are covered by snow or die back due to freezing temperatures or other factors (USACE, 2010). The end of the growing season is indicated when woody deciduous species lose their leaves or the last herbaceous plants cease flowering and their leaves become dry or brown, whichever occurs latest. The wetland delineation field work within the Project corridor was conducted after the occurrence of these events and therefore, outside the normal growing season. Conducting a wetland delineation with freezing temperatures and outside the normal growing season can make identifying the wetland/upland boundary more challenging and may require further assessment during the next growing season.

2.1.4 WETLAND CLASSIFICATIONS

Wetlands were classified based on the naming convention found in Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al, 1979).
2.1.5 OHIO RAPID ASSESSMENT METHOD v. 5.0

The Ohio Environmental Protection Agency (OEPA) Ohio Rapid Assessment Method for Wetlands v. 5.0 (ORAM) was developed to determine the relative ecological quality and level of disturbance of a particular wetland in order to meet requirements under Section 401 of the Clean Water Act. Wetlands are scored on the basis of hydrology, upland buffer, habitat alteration, special wetland communities, and vegetation communities. Each of these subject areas is further divided into subcategories under ORAM v. 5.0 resulting in a score that describes the wetland using a range from 0 (low quality and high disturbance) to 100 (high quality and low disturbance). Wetlands scored from 0 to 29.9 are grouped into “Category 1”, 30 to 59.9 are “Category 2” and 60 to 100 are “Category 3”. Transitional zones exist between “Categories 1 and 2” from 30 to 34.9 and between “Categories 2 and 3” from 60 to 64.9. However, according to the OEPA, if the wetland score falls into the transitional range, it must be given the higher Category unless scientific data can prove it should be in a lower Category (Mack, 2001).

Category 1 Wetlands

Category 1 wetlands support minimal wildlife habitat, hydrological and recreational functions, and do not provide for or contain critical habitats for threatened or endangered species. In addition, Category 1 wetlands are often hydrologically isolated and have some or all of the following characteristics: low species diversity, no significant habitat for wildlife use, limited potential to achieve wetland functions, and/or a predominance of non-native species. These limited quality wetlands are considered to be a resource that has been severely degraded or has a limited potential for restoration, or is of low ecological functionality.

Category 2 Wetlands

Category 2 wetlands “...support moderate wildlife habitat, or hydrological or recreational functions,” and as wetlands which are “...dominated by native species but generally without the presence of, or habitat for, rare, threatened or endangered species; and wetlands which are degraded but have a reasonable potential for reestablishing lost wetland functions.” Category 2 wetlands constitute the broad middle category of “good” quality wetlands, and can be considered a functioning, diverse, healthy water resource that has ecological integrity and human value. Some Category 2 wetlands are lacking in human disturbance and considered to be naturally of moderate quality; others may have been Category 3 wetlands in the past, but have been degraded to Category 2 status.

Category 3 Wetlands

Wetlands that are assigned to Category 3 have “...superior habitat, or superior hydrological or recreational functions.” They are typified by high levels of diversity, a high proportion of native species, and/or high functional values. Category 3 wetlands include wetlands which contain or provide habitat for threatened or endangered species, are high quality mature forested wetlands, vernal pools, bogs, fens, or...
A wetland may be a Category 3 wetland because it exhibits one or all of the above characteristics. For example, a forested wetland located in the flood plain of a river may exhibit “superior” hydrologic functions (e.g. flood retention, nutrient removal), but not contain mature trees or high levels of plant species diversity.

2.2 STREAM CROSSINGS

Regulatory activities under the Clean Water Act provide authority for states to issue water quality standards and “designated uses” to all waters of the U.S. upstream to the highest reaches of the tributary streams. In addition, the Federal Water Pollution Control Act of 1972 and its 1977 and 1987 amendments require knowledge of the potential fish or biological communities that can be supported in a stream or river, including upstream headwaters. Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high water mark (OHWM). The USACE defines OHWM as “that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas” (USACE, 2005).

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

2.2.1 OEPA QUALITATIVE HABITAT EVALUATION INDEX

The Qualitative Habitat Evaluation Index (QHEI) is designed to provide a rapid determination of habitat features that correspond to those physical factors that most affect fish communities and which are generally important to other aquatic life (e.g., macroinvertebrates). The quantitative measure of habitat used to calibrate the QHEI score are Indices (or Index) of Biotic Integrity (IBI) for fish. In most instances the QHEI is sufficient to give an indication of habitat quality, and the intensive quantitative analysis used to measure the IBI is not necessary. It is the IBI, rather than the QHEI, that is directly correlated with the aquatic life use designation for a particular surface water.

The QHEI method is generally considered appropriate for waterbodies with drainage basins greater than one square mile, if natural pools are greater than 40 cm, or if the water feature is shown as blue-line waterways on USGS 7.5-minute topographic quadrangle maps. In order to convey general stream habitat quality to the regulated public, the OEPA has assigned narrative ratings to QHEI scores. The ranges vary slightly for headwater streams (H are those with a watershed area less than or equal to 20 square miles) versus larger streams (L are those with a watershed area greater than 20 square miles). The Narrative Rating System includes: Very Poor (<30 H and L), Poor (30 to 42 H, 30 to 44 L), Fair (43 to 54 H, 45 to 59 L), Good (55 to 69 H, 60 to 74 L) and Excellent (70+ H, 75+ L).
2.2.2 OEPA PRIMARY HEADWATER HABITAT EVALUATION INDEX

Headwater streams are typically considered to be first-order and second-order streams, meaning streams that have no upstream tributaries (or “branches”) and those that have only first-order tributaries, respectively. The stream order concept can be problematic when used to define headwater streams because stream-order designations vary depending upon the accuracy and resolution of the stream delineation. Headwater streams are generally not shown on USGS 7.5-minute topographic quadrangles and are sometimes difficult to distinguish on aerial photographs. Nevertheless, headwater streams are now recognized as useful monitoring units due to their abundance, widespread spatial scale and landscape position (Fritz, et al. 2006). Impacts to headwater streams can have a cascading effect on the downstream water quality and habitat value. The headwater habitat evaluation index (HHEI) is a rapid field assessment method for physical habitat that can be used to appraise the biological potential of most Primary Headwater Habitat (PHWH) streams. The HHEI was developed using many of the same techniques as used for QHEI, but has criteria specifically designed for headwater habitats. To use HHEI, the stream must have a “defined bed and bank, with either continuous or periodically flowing water, with watershed area less than or equal to 1.0 mi$^2$ (259 ha), and a maximum depth of water pools equal to or less than 15.75 inches (40 cm)” (OEPA, 2012).

Headwater streams are scored on the basis of channel substrate composition, bankfull width, and maximum pool depth. Assessments result in a score (0 to 100) that is converted to a specific PHWH stream class. Streams that are scored from 0 to 29.9 are typically grouped into “Class 1 PHWH Streams”, 30 to 69.9 are “Class 2 PHWH Streams”, and 70 to 100 are “Class 3 PHWH Streams”. Technically, a stream can score relatively high, but actually belong in a lower class, and vice-versa. According to the OEPA, if the stream score falls into a class and the scorer feels that based on site observations that score does not reflect the actual stream class, a decision-making flow chart can be used to determine appropriate PHWH stream class using the HHEI protocol (OEPA, 2012). Evidence of anthropogenic alterations to the natural channel will result in a “Modified” qualifier for the stream.

**Class 1 PHWH Streams:** Class 1 PHWH Streams are those that have “normally dry channels with little or no aquatic life present” (OEPA, 2012). These waterways are usually ephemeral, with water present for short periods of time due to infiltration from snowmelts or rainwater runoff.

**Class 2 PHWH Streams:** Class 2 PHWH Streams are equivalent to “warm-water habitat” streams. This stream class has a “moderately diverse community of warm-water adapted native fauna either present seasonally or on an annual basis” (OEPA, 2012). These species communities are composed of vertebrates (fish and salamanders) and/or benthic macroinvertebrates that are considered pioneering, headwater temporary, and/or temperature facultative species.
Class 3 PHWH Streams: Class 3 PHWH Streams usually have perennial water flow with cool-cold water adapted native fauna. The community of Class 3 PHWH Streams is comprised of vertebrates (either cold water adapted species of headwater fish and or obligate aquatic species of salamanders, with larval stages present), and/or a diverse community of benthic cool water adapted macroinvertebrates present in the stream continuously (on an annual basis).

2.3 RARE, THREATENED AND ENDANGERED SPECIES

AECOM conducted a rare, threatened, and endangered species review and general field habitat surveys within areas crossed by the Project survey corridor. This report will be used to assist AEP Ohio Transco’s efforts to avoid impacts to threatened and endangered species potentially present in the survey corridor during construction activities. The first phase of the survey involved a review of online lists of federal and state species of concern. In addition to the review of available literature, AECOM submitted a request to Ohio Department of Natural Resources (ODNR) Office of Real Estate – Environmental Review Section soliciting comments on the Project. AECOM also submitted a coordination letter to the USFWS soliciting comments on the Project. Agency-identified species and available species-specific information was reviewed to identify the various habitat types that listed species are known to inhabit. AECOM field ecologists conducted a general habitat survey in conjunction with the stream and wetland field survey between March 15 and March 23, 2017 and between May 1 and May 3, 2018.

3.0 RESULTS

Within the Project survey corridor, AECOM delineated no wetlands, no streams, and no ponds.

3.1 WETLAND DELINEATION

3.1.1 Preliminary Soils Evaluation

Soils were observed and documented as part of the delineation methodology. According to the USDA/NRCS Web Soil Survey of Marion County, Ohio (NRCS 2017) and the NRCS Hydric Soils Lists of Ohio, three soil series are mapped within the Project survey corridor (NRCS 2017). Of these soil series, two soil map units are listed as hydric, and the third has areas of hydric inclusions. Table 1 provides a detailed overview of all soil series and soil map units within the Project survey corridor. Soil map units located within the Project survey corridor are shown on Figure 2.
TABLE 1
SOIL MAP UNITS AND DESCRIPTIONS WITHIN THE MOUNT VERNON-SOUTH KENTON 138kV TRANSMISSION LINE PROJECT SURVEY CORRIDOR

<table>
<thead>
<tr>
<th>Soil Series</th>
<th>Symbol</th>
<th>Map Unit Description</th>
<th>Topographic Setting</th>
<th>Hydric</th>
<th>Hydric Component (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blount</td>
<td>Blg1A1</td>
<td>Blount silt loam, ground moraine, 0 to 2 percent slopes</td>
<td>Ground moraines on till plains</td>
<td>Not Hydric</td>
<td>Pewamo-Ground moraine (9%)</td>
</tr>
<tr>
<td>Milford</td>
<td>Mf</td>
<td>Milford silty clay loam</td>
<td>Flats</td>
<td>Hydric</td>
<td>Milford (90%), Houghton, undrained (3%)</td>
</tr>
<tr>
<td>Westland</td>
<td>We</td>
<td>Westland clay loam</td>
<td>Stream terraces</td>
<td>Hydric</td>
<td>Westland (90%), rarely flooded areas (3%)</td>
</tr>
</tbody>
</table>

(1) Data sources include:

3.1.2 National Wetland Inventory Map Review

National Wetland Inventory (NWI) wetlands are areas of potential wetland that have been identified from USFWS aerial photograph interpretation which have typically not been field verified. Forested and heavy scrub/shrub wetlands are often not shown on NWI maps as foliage effectively hides the visual signature that indicates the presence of standing water and moist soils from an aerial view. The USFWS website states that the NWI maps are not intended or designed for jurisdictional wetland identification or location. As a result, NWI maps do not show all the wetlands found in a particular area nor do they necessarily provide accurate wetland boundaries. NWI maps are useful for providing indications of potential wetland areas, which are often supported by soil mapping and hydrologic predictions, based upon topographical analysis using USGS topographic maps.

According to the NWI maps of the Marion West, Ohio quadrangle, the Project survey corridor contains no mapped NWI wetlands. The locations of nearby NWI mapped wetlands are shown on Figure 2.

3.1.3 Delineated Wetlands

During the field survey, AECOM identified no wetlands within the Project survey corridor.

3.2 STREAM CROSSINGS

AECOM identified no streams within the Project survey corridor.

3.3 PONDS

AECOM identified no ponds within the Project survey corridor.
3.4 VEGETATIVE COMMUNITIES WITHIN THE PROJECT SURVEY CORRIDOR

AECOM field ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys between March 15 and March 23, 2017 and between May 1 and May 3, 2018. Portions of the Project survey corridor were identified as agricultural land and urban areas, as described below in Table 2. Habitat descriptions, applicable to the Project, and details on the expected impacts of construction are provided below. Vegetated land cover can be seen visually from aerial photography provided on Figure 3.

<table>
<thead>
<tr>
<th>Vegetative Community</th>
<th>Description</th>
<th>Approximate Acreage Within the Project Survey Area</th>
<th>Approximate Percentage within the Project Survey Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural Land</td>
<td>Agricultural land consisting of soybean, corn fields, and winter wheat were present along the Project survey area. The agricultural land contains row crops and is not used for pasture or hay fields.</td>
<td>3.44</td>
<td>96.6%</td>
</tr>
<tr>
<td>Urban</td>
<td>Urban areas are areas developed with residential and commercial land uses, including roads, buildings and parking lots. These areas are generally devoid of significant woody and herbaceous vegetation.</td>
<td>0.12</td>
<td>3.4%</td>
</tr>
<tr>
<td>Totals:</td>
<td></td>
<td>3.56</td>
<td>100%</td>
</tr>
</tbody>
</table>

3.5 THREATENED AND ENDANGERED SPECIES AGENCY COORDINATION

Protected Species Agency Consultation –

AECOM conducted a rare, threatened, and endangered species review for areas crossed by the Harpster-Waldo 69 kV transmission line rebuild Project survey corridor, including the rebuild portion of the Mount Vernon-South Kenton 138kV transmission line Project. A summary of the agency coordination responses for the Harpster Pumping-Waldo 69 kV transmission line project is provided below. Correspondence letters from the USFWS and ODNR are included as Appendix A. Table 3 provides a list of these species of concern identified in the Project corridor during the rare, threatened, and endangered species review.
### TABLE 6
**ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT AREA**

<table>
<thead>
<tr>
<th>Common Name (Scientific Name)</th>
<th>State Status</th>
<th>Federal Status</th>
<th>Habitat Description</th>
<th>Potential Habitat Observed in the Project Survey Area</th>
<th>Impact Assessment</th>
<th>Agency Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mammals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indiana bat (Myotis sodalis)</td>
<td>Endangered</td>
<td>Endangered</td>
<td>Winter Indiana bat hibernacula include caves and mines, while summer habitat typically includes tree species exhibiting exfoliating bark or cavities that can be used for roosting. The 8- to 10-inch diameter size classes of several species of hickory (Carya spp.), oak (Quercus spp.), ash (Fraxinus spp.), birch (Betula spp.), and elm (Ulmus spp.) have been found to be utilized by the Indiana bat. These tree species and many others may be used when dead, if there are adequately sized patches of loosely-adhering bark or open cavities. The structural configuration of forest stands favored for roosting includes a mixture of loose-barked trees with 60 to 80 percent canopy closure and a low density subcanopy (less than 30 percent between about 6 feet high and the base canopy). The suitability of roosting habitat for foraging or the proximity to suitable foraging habitat is critical to the evaluation of a particular tree stand. An open subcanopy zone, under a moderately dense canopy, is important to allow maneuvering while catching insect prey.</td>
<td>No</td>
<td></td>
<td>USFWS commented that due to the project type, size, and location, plus the project proposal for seasonal cutting tree cutting between October 1 and March 31, there should be no expected impacts to the Indiana bat. ODNR requested that suitable Indiana bat habitat should be conserved or cut between October 1 and March 31.</td>
</tr>
<tr>
<td>Northern long-eared bat (Myotis septentrionalis)</td>
<td>Threatened</td>
<td>Threatened</td>
<td>Winter hibernacula include caves and mines, while summer habitat typically includes tree species exhibiting exfoliating bark or cavities that can be used for roosting. The 8- to 10-inch diameter size classes of several species of hickory (Carya spp.), oak (Quercus spp.), ash (Fraxinus spp.), birch (Betula spp.), and elm (Ulmus spp.) have been found to be utilized by northern long-eared bats. These tree species and many others may be used when dead, if there are adequately sized patches of loosely-adhering bark or open cavities. The structural configuration of forest stands favored for roosting includes a mixture of loose-barked trees with 60 to 80 percent canopy closure and a low density subcanopy (less than 30 percent between about 6 feet high and the base canopy). The suitability of roosting habitat for foraging or the proximity to suitable foraging habitat is critical to the evaluation of a particular tree stand. An open subcanopy zone, under a moderately dense canopy, is important to allow maneuvering while catching insect prey.</td>
<td>No</td>
<td></td>
<td>USFWS commented that due to the project type, size, and location, plus the project proposal for seasonal cutting tree cutting between October 1 and March 31, there should be no expected impacts to the northern long-eared bat.</td>
</tr>
</tbody>
</table>
open subcanopy zone, under a moderately dense canopy, is important to allow maneuvering while catching insect prey. Northern long-eared bats have also been found, albeit rarely, roosting in structures like barns and sheds.

<table>
<thead>
<tr>
<th>Mussels</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Clubshell</strong> <em>(Pleurobema clava)</em></td>
<td>Endangered</td>
<td>Endangered</td>
<td>No</td>
</tr>
<tr>
<td>This mussel prefers clean, loose sand and gravel in medium to small rivers and streams. This mussel will bury itself in the bottom substrate to depths of up to four inches.</td>
<td>No in-water work is planned as part of the Project. No impacts to mussel species and their habitat are anticipated.</td>
<td>ODNR stated that due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.</td>
<td></td>
</tr>
<tr>
<td><strong>Rayed Bean</strong> <em>(Villosa fabalis)</em></td>
<td>Endangered</td>
<td>Endangered</td>
<td>No</td>
</tr>
<tr>
<td>The rayed bean generally lives in smaller, headwater creeks, but it is sometimes found in large rivers and wave-washed areas of glacial lakes. It prefers gravel or sand substrates, and is often found in and around roots of aquatic vegetation.</td>
<td>No in-water work is planned as part of the Project. No impacts to mussel species and their habitat are anticipated.</td>
<td>ODNR stated that due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.</td>
<td></td>
</tr>
<tr>
<td><strong>Snuffbox</strong> <em>(Epioblasma triqueta)</em></td>
<td>Endangered</td>
<td>Endangered</td>
<td>No</td>
</tr>
<tr>
<td>The snuffbox is usually found in small- to medium-sized creeks, inhabiting areas with a swift current, although it is also found in Lake Erie and some larger rivers. Adults often burrow deep in sand, gravel or cobble substrates, except when they are spawning or the females are attempting to attract host fish.</td>
<td>No in-water work is planned as part of the Project. No impacts to mussel species and their habitat are anticipated.</td>
<td>ODNR stated that due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.</td>
<td></td>
</tr>
<tr>
<td><strong>Rabbitsfoot</strong> <em>(Quadrula cylindrica)</em></td>
<td>Endangered</td>
<td>None</td>
<td>No</td>
</tr>
<tr>
<td>This mussel prefers small to medium rivers with moderate to swift currents, and in smaller streams it inhabits bars or gravel and cobble close to the fast current. Found in medium to large rivers in sand and gravel.</td>
<td>No in-water work is planned as part of the Project. No impacts to mussel species and their habitat are anticipated.</td>
<td>ODNR stated that due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.</td>
<td></td>
</tr>
<tr>
<td><strong>Pondhorn</strong> <em>(Uniomerus tetralasmus)</em></td>
<td>Threatened</td>
<td>None</td>
<td>No</td>
</tr>
<tr>
<td>This mussel prefers ponds, small creeks, and the headwaters of larger streams in mud and sand. This mussel can withstand periods of desiccation and is often present in areas where few other mussels are found.</td>
<td>No in-water work is planned as part of the Project. No impacts to mussel species and their habitat are anticipated.</td>
<td>ODNR stated that due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reptiles</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eastern massasauga</strong> <em>(Sistrurus catenatus)</em></td>
<td>Endangered</td>
<td>Threatened</td>
<td>No</td>
</tr>
<tr>
<td>The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as adjacent drier upland habitat.</td>
<td>No potentially suitable habitat was identified within the Project area.</td>
<td>If suitable habitat is determined to be present at the project site, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimize plan be developed and implemented by an approved herpetologist.</td>
<td></td>
</tr>
</tbody>
</table>

AEP Ohio Transco
138 kV
June 2018

Mount Vernon-South Kenton
Transmission Line Rebuild Project
### Wetland Delineation Report

<table>
<thead>
<tr>
<th>Birds</th>
<th>Endangered</th>
<th>None</th>
<th>Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps.</th>
<th>No</th>
<th>If wetland habitat will be impacted, ODNR requests construction should be avoided in this habitat during the species’ nesting period of May 1 to July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.</th>
</tr>
</thead>
<tbody>
<tr>
<td>American bittern (Botaurus lentiginosus)</td>
<td>Endangered</td>
<td>None</td>
<td>Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps.</td>
<td>No</td>
<td>If wetland habitat will be impacted, ODNR requests construction should be avoided in this habitat during the species’ nesting period of May 1 to July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.</td>
</tr>
<tr>
<td>King rail (Rallus elegans)</td>
<td>Endangered</td>
<td>None</td>
<td>Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation.</td>
<td>No</td>
<td>If wetland habitat will be impacted, ODNR requests construction should be avoided in this habitat during the species’ nesting period of May 1 to August 1. If no wetland habitat will be impacted, this project is not likely to impact this species.</td>
</tr>
<tr>
<td>Bald eagle (Haliaeetus leucocephalus)</td>
<td>None</td>
<td>Recovered</td>
<td>Bald eagles require a good food base, perching areas, and nesting sites. Their habitat includes estuaries, large lakes, reservoirs, rivers, and some seacoasts. In winter, the birds congregate near open water in tall trees for spotting prey and night roosts for sheltering.</td>
<td>No</td>
<td>In order to avoid take of bald eagles, USFWS recommends that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Further we request that work within 660 feet of a nest or within the direct line-of-site of a nest be restricted from January 15 through July 31.</td>
</tr>
</tbody>
</table>
ODNR-DOW Coordination –

Coordination with the ODNR-DOW was initiated during the planning stages of the Harpster-Waldo Project to obtain ONHD records located in the vicinity of the Project. On November 22, 2016, the ODNR-DOW replied to an e-mailed request for records of protected species within an extended area around the Project site. The ONHD indicated that there are nine records of state endangered or threatened plants or animals within the Project vicinity. These species include prairie ironweed (Vernonia fasciculata), a state endangered plant, beer’s noctuid (Papaipema beeriana), a state endangered invertebrate, glomerate dodder (Cuscuta glomerata), a state endangered plant, snuffbox (Epioblasma triquetra), a state and federally endangered mussel, spartina moth (Spartiniphaga inops), a state endangered insect, king rail (Rallus elegans), a state endangered bird, royal catchfly (Selina regia), a state threatened plant, and large blazing-star (Liatris scariosa), a state threatened plant. None of these records were in the immediate vicinity of the Mount Vernon-South Kenton rebuild section.

In a letter dated January 13, 2017, the ODNR-DOW provided comments on the Harpster-Waldo Project with regard to state and/or federally-listed threatened and endangered species that may occur within the Harpster-Waldo Project vicinity. ODNR-DOW recommended that impact to wetlands, streams or other water resources be avoided or minimized and that erosion and sediment controls be utilized. ODNR-DOW further stated that the Project is within the range of the state and federally endangered Indiana bat (Myotis sodalis) and recommends tree cutting to occur between October 1st and March 31st. ODNR-DOW indicated that the Project is in the range of the eastern massasauga, a state endangered and federally threatened species. ODNR-DOW commented that if suitable habitat is determined to be present at the project site, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimize plan be developed and implemented by an approved herpetologist to ensure that any timber rattlesnakes that may be utilizing the area are not impacted by the project. In addition, the DOW recommends that the habitat suitability survey be conducted by an approved herpetologist.

ODNR-DOW noted that the Harpster-Waldo Project is within the range of a few state and federally listed mussel species and indicates that this Project must not have impacts to any freshwater mussel species. ODNR-DOW indicated that due to the location, and that there is no in-water work proposed in a perennial stream, this Project is not likely to impact these species.

ODNR indicated that the Harpster-Waldo Project is within the range of the American bittern (Botaurus lentiginosus), a state endangered bird. ODNR stated that this species utilizes large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, ODNR-DOW recommends
that construction should be avoided during this species’ nesting period of May 1 to July 31. This Project will not likely impact this species if the habitats indicated above will not be impacted.

ODNR indicated that the Harpster-Waldo Project is within range of the king rail (*Rallus elegans*), a state endangered bird. ODNR stated that this species utilizes deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, ODNR-DOW recommends that construction should be avoided during this species’ nesting period of May 1 to August 1. This project will not likely impact this species if the habitats indicated above will not be impacted. Potential nesting locations for these bird species can be seen on Figures 4A through 4HH. A summary of potential avian habitat located near proposed structures is provided in Appendix F.

**USFWS Coordination**

In a letter dated December 20, 2016, the USFWS provided comments on the Harpster-Waldo Project with regard to federally-listed threatened and endangered species that may occur within the project vicinity. The USFWS indicated that there are no Federal wildlife refuges, wilderness areas, or critical habitat within the vicinity of the Project.

The USFWS noted that the Harpster-Waldo Project lies within the range of the federally endangered Indiana bat (*Myotis sodalis*), and the federally threatened northern long-eared bat (*Myotis septentrionalis*). USFWS recommends that should the proposed site contain trees ≥3 inches dbh, that trees be saved wherever possible. If tree clearing cannot be avoided, USFWS recommends that tree removal occur between October 1 and March 31 avoid adverse effects to Indian bats and northern long-eared bats during the brood-rearing months.

The USFWS noted that the Harpster-Waldo project lies in the range of the federally threatened eastern massasauga. USFWS stated that eastern massasaugas use both upland and wetland habitat and these habitats differ by season. Adjoining lowland and upland habitat with variable elevations between are important for inter-seasonal movements. USFWS recommended a habitat assessment if habitat types or features occur within the Project corridor.

USFWS noted that the Harpster-Waldo Project is within range of two documented bald eagle nest locations. These locations are not within 0.5 mile of the Mount Vernon-South Kenton 138 kV transmission line rebuilding Project. USFWS recommends that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. USFWS also requests that work within 660 feet of a nest or within the direct line-of-site of a nest be restricted from January 15 through July 31.

Due to the project type, size, and location, the USFWS does not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species.
4.0 SUMMARY

The ecological survey of the Project survey corridor identified no wetlands, streams or ponds.

With regard to state and/or federally-listed threatened and endangered species that may occur within the Project vicinity, ODNR indicated that impacts to state and/or federally listed mussel or fish species are not likely due to the location of the Project and that no in-water work is proposed.

ODNR commented that if impact to emergent wetlands is to occur as a result of construction, this activity should be conducted outside of the American bittern’s nesting window of May 1 to July 31 as well as the king rail’s nesting window of May 1 to August 1. If this habitat will not be impacted, the Project is not likely to impact the species. ODNR indicated that this Project is within range of the king rail. If wetland habitat will be impacted, ODNR requests construction should be avoided in this habitat during the species’ nesting period of May 1 to August 1. If wetland habitat will not be impacted, this project is not likely to impact this species.

The ODNR and USFWS noted that the Project lies in the range of the federally threatened eastern massasauga. The agencies recommended that if suitable habitat is determined to be present at the project site, that a presence/absence survey be conducted, or an avoidance/minimize plan be developed and implemented by an approved herpetologist.

Based on general observations during the ecology survey, none of the Project survey corridor contained potential summer habitat for the Indiana bat and the northern long-eared bat. The agencies do not anticipate impacts to the species due to the project type, size, location, and proposed implementation of seasonal tree cutting (during October 1st and March 31st), to avoid impacts to these bat species.

The reported results of the ecological survey conducted by AECOM on this Project are limited to the areas within the Project survey boundary provided in Figure 2: Soil Map Unit and National Wetland Inventory Map. Areas that fall outside of the Project survey boundary, including any portion of work pads or access roads, were not evaluated in the field and are not included in the reporting of this survey.

The information contained in this wetland delineation report is for a study corridor that may be much larger than the actual Project limits-of-disturbance; therefore, lengths and acreages listed in this report may not constitute the actual impacts of the Project defined in subsequent permit applications. If necessary, a separate report that identifies the actual Project impacts will be provided with agency submittals.

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


Rankin, Edward T. 2006. *Methods for Assessing Habitat in Flowing Waters: Using the Qualitative Habitat Evaluation Index (QHEI).* OEPA Ecological Assessment Section, Division of Surface Water, Columbus, Ohio.


FIGURE 2
SOIL MAP UNIT AND NATIONAL WETLAND INVENTORY MAP

LEGEND:
- Mount Vernon-South Kenton 138 kV Transmission Line
- Project Survey Corridor
- NWI Wetland
- Soil Map Unit

Soil Map Unit Symbol:
- Blg1A1: Blount silt loam, ground moraine, 0 to 2 percent slopes
- Mf: Milford silty clay loam
- We: Westland clay loam

BASE MAP SOURCE:
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APPENDIX A

CORRESPONDENCE LETTERS FROM USFWS AND ODNR
December 20, 2016

Beth Wilburn
AECOM
525 Vine St., Suite 1800
Cincinnati, OH 45202

Re: Harpster Pumping-Waldo 69 kV Transmission Line Project, Marion and Wyandot Counties, Ohio

Dear Ms. Wilburn,

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

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: The project lies within the range of the eastern massasauga (Sistrurus catenatus), a small, docile rattlesnake that is federally listed as threatened. Several factors have contributed to the decline of the species including habitat loss and fragmentation, indiscriminate killing, collection, gene pool contamination and incompatible land use practices. Eastern massasaugas are known to occur in Pitt Township, Wyandot County and may occur in Salt Rock and Big Island Townships in Marion County.

Eastern massasaugas use both upland and wetland habitat and these habitats differ by season. During the winter, massasaugas hibernate in low wet areas, primarily in crayfish burrows, but may use other structures. Presence of a water table near the surface is important for a suitable hibernaculum. In the summer, massasaugas use drier, open areas that contain a mix of grasses and forbs such as goldenrods and other prairie plants that may be intermixed with trees or shrubs. Adjoining lowland and upland habitat with variable elevations between are critical for the
species to travel back and forth seasonally. Should the proposed project area contain any of the habitat types or features described above, we recommend that a habitat assessment be conducted to determine if suitable habitat for the species exists within the vicinity of the proposed site. Please note that habitat assessments should only be conducted by approved eastern massasauga surveyors due to variable habitat types and the cryptic nature of the species. Any habitat assessments or surveys should be coordinated with this office.

All projects in the State of Ohio lie within the range of the federally endangered Indiana bat (Myotis sodalis) and the federally threatened northern long-eared bat (Myotis septentrionalis). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

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

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.
If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

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

MIGRATORY BIRD COMMENTS: The project lies within the range of the bald eagle (*Haliaeetus leucocephalus*). Bald eagles are protected under the Migratory Bird Treaty Act (16 U.S.C. 703-712; MBTA), and are afforded additional legal protection under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, BGEPA). The BGEPA prohibits, among other things, the killing and disturbance of eagles.

Our records indicate that a bald eagle nest is located within approximately 600 feet of the project area, and a second nest is located within approximately 0.5 miles of the project area (see attached map for approximate nest locations). Our database of nest locations may not be complete because new nests are built each year, and nesting pairs sometimes build multiple nests. Therefore, we recommend that the site and surrounding area be evaluated to determine if any additional eagle nests are present and to validate the actual nest locations.

In order to avoid take of bald eagles, we recommend that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Further we request that work within 660 feet of a nest or within the direct line-of-site of a nest be restricted from January 15 through July 31. This will prevent disturbance of the eagles from the egg-laying period until the young fledge, which encompasses their most vulnerable times. Once site specific eagle nest information is available, we can work with you to determine the appropriate buffer from the nest(s) relative to your proposed activities.

If these recommendations cannot be implemented and take of bald eagles is likely, a bald eagle take permit for this project may be necessary. Further information on eagle take permits can be found at: [http://www.fws.gov/midwest/MidwestBird/EaglePermits/index.html](http://www.fws.gov/midwest/MidwestBird/EaglePermits/index.html).

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

Dan Everson
Field Supervisor

cc: Nathan Reardon, ODNR-DOW
    Kate Parsons, ODNR-DOW
November 22, 2016

Beth Wilburn
AECOM
525 Vine St.
Cincinnati, OH 45202

Dear Ms. Wilburn,

Per your request, I have e-mailed you a set of shapefiles with our Natural Heritage Program data for the Harpster Pumping-Waldo 69 kV Transmission Line Rebuild project, including a one mile radius, in Pitt Township, Wyandot County and Salt Rock, Big Island, Green Camp, Pleasant, Waldo and Prospect Townships, Marion County, Ohio. This data will not be published or distributed beyond the scope of the project description on the data request form.

Records included in the data layer may be for rare and endangered plants and animals, geologic features, high quality plant communities and animal assemblages. Fields included are scientific and common names, state and federal statuses, as well as managed area and date of the most recent observation. State and federal statuses are defined as: E = endangered, T = threatened, P = potentially threatened, SC = species of concern, SI = special interest, A = recently added to inventory with a state status not yet determined, X = presumed extirpated from Ohio, FE = federal endangered, FT = federal threatened, FC = federal candidate species, and FSC = federal species of concern.

In addition to the species given in the data shapefile, there are one or more additional records for a Bald Eagle nest within your project area or the one mile radius. These are shown in the additional eagle nests data layer. Because of the way some Bald Eagle data was submitted to us, we had to create a separate shapefile for some of the most recent nest records. Since the Bald Eagle was removed from the state rare species list, the Natural Heritage Program will no longer be maintaining comprehensive Bald Eagle nest data going forward.

The managed areas layer includes state, federal and county lands, as well as areas owned by non-profits, museums and other entities. Managed areas are sites under formal protection for their natural resources. Please be aware that this layer may not be complete and we are continually updating it as new information becomes available to us.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. This letter only represents a review of rare species and natural features data within the Ohio Natural Heritage Database. It does not
fulfill coordination under the National Environmental Policy Act (NEPA) or the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S. C. 661 et seq.) and does 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.

Please contact me at 614-265-6818 if I can be of further assistance.

Sincerely,

[Signature]

Debbie Woischke
Ohio Natural Heritage Program
January 13, 2017

Beth Wilburn  
AECOM  
525 Vine Street, Suite 1800  
Cincinnati, Ohio 45202, USA

Re: 16-871; Harpster Pumping-Waldo 69 kV Transmission Line Project

Project: The proposed project involves rebuilding approximately 25-mile long Harpster Pumping-Waldo 69 kV electric transmission line.

Location: The proposed project is located in Waldo, Prospect, Pleasant, Big Island, Salt Rock, and Pitt Townships, Marion and Wyandot Counties, Ohio.

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

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

Prairie false indigo (Baptisia lactea), P
Glomerate dodder (Cuscuta glomerata), E
Large blazing-star (Liatris scariosa), T
Prairie rattlesnake-root (Prenanthes racemosa), P
Royal catchfly (Silene regia), T
Prairie ironweed (Vernonia fasciculata), E
Snuffbox (Epioblasma triqueta), E, FE
Wavy-rayed lampmussel (Lampsilis fasciola), SC
Rayed bean (Villosa fabalis), E, FE
Mussel bed
Bald eagle (Haliaeetus leucocephalus), FSC
King rail (Rallus elegans), E
Beer’s noctuid (Papaipema beeriana), E
Spartina moth (Spartiniphaga inops), E
Killdeer Plains Wildlife Area – ODNR Division of Wildlife
The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

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

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

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

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

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

The project is within the range of the clubshell (Pleurobema clava), a state endangered and federally endangered mussel, the rayed bean (Villosa fabalis), a state endangered and federally endangered mussel, the snorkbox (Epioblasma triqueta), a state endangered and federally endangered mussel, the rabbitsfoot (Quadrula cylindrica cylindrica), a state endangered and federal candidate mussel, and the pondhorn (Uniomerus tetralasmus), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.
The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as adjacent drier upland habitat. The DOW recommends that a habitat suitability survey be conducted to determine if suitable habitat exists at the project site. If suitable habitat is determined to be present at the project site, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimize plan be developed and implemented by an approved herpetologist to ensure that any timber rattlesnakes that may be utilizing the area are not impacted by the project. In addition, the DOW recommends that the habitat suitability survey be conducted by an approved herpetologist.

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

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat during the species’ nesting period of May 1 to August 1. If no wetland habitat will 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 U.S. Fish & Wildlife Service.

**Natural Areas:** The Division of Natural Areas and Preserves has the following comment.

Per the proposed current work, the project may impact populations of state endangered Philadelphia panic grass (*Panicum philadelphicum*) and state threatened prairie wedge grass (*Sphenopholis obtusata var. obtusata*). Records of the species occurs along the Erie-Lackawanna railroad line running east to west between Espyville and Marion. Because of the potential for disruption, it is highly recommended that a pre-construction survey be conducted to ensure that the plants are not impacted. If you have any questions regarding the plants or are in need of survey assistance, please contact DNAP’s Chief Botanist, Rick Gardner, at rick.gardner@dnr.state.oh.us or (614) 265-6419.

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

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

[http://water.ohiodnr.gov/water-use-planning/floodplain-management#PUB](http://water.ohiodnr.gov/water-use-planning/floodplain-management#PUB)

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

John Kessler
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
John.Kessler@dnr.state.oh.us
Appendix D  Cultural Coordination Letter
July 13, 2018

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

RE: South Kenton-Mount Vernon 138kV Rebuild Project, Pleasant Township, Marion County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on June 15, 2018 regarding the proposed South Kenton-Mount Vernon 138kV Rebuild Project, Pleasant Township, Marion County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-4). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the Phase I Archaeological Investigations for the Approximately 450 m (1,476 ft) South Kenton-Mount Vernon 138kV Rebuild Project in Pleasant Township, Marion County, Ohio by Weller & Associates, Inc. (2018).

A literature review, visual inspection, and surface collection was completed as part of the investigations. No previously identified archaeological sites are located within the project area. No new sites were identified during this survey. Based on the information provided, we agree no additional archaeological survey is needed.

The following comments pertain to the History/Architecture Investigations for the Approximately 450 m (1,476 ft) South Kenton-Mount Vernon 138kV Rebuild Project in Pleasant Township, Marion County, Ohio by Weller & Associates, Inc. (2018).

The history/architecture field survey included a systematic approach to identifying all properties fifty years of age or older that may have a potential view of the project. Three individual resources fifty years of age or older were identified during field investigations.

It is Weller’s recommendation that the identified properties are not eligible for inclusion in the National Register of Historic Places (NRHP) due to a lack of associative significance, a loss of integrity, or a lack of character defining features. Our office agrees with Weller’s recommendations regarding eligibility.

The results of the architectural investigation identified no historic properties located within the APE that exhibit potential significance for inclusion in the NRHP. Therefore, we agree that the project as proposed will have no effect on historic properties.

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

RPR Serial No. 1074409, 1074410

800 E. 17th Ave., Columbus, OH 43211-2474  614.297.2300  ohiohistory.org
Mr. Ryan Weller  
Page 2  
July 13, 2018

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

Sincerely,

[Signature]

Krista Horrocks, Project Reviews Manager  
Resource Protection and Review

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