

Construction Notice for the Greene-Beatty 345 kV Transmission Line Adjustment Project



An **AEP** Company

PUCO Case No. 26-0884-EL-BNR

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

Submitted by:
Ohio Power Company

August 31, 2026

CONSTRUCTION NOTICE FOR THE GREENE-BEATTY 345 KV TRANSMISSION LINE ADJUSTMENT PROJECT

CONSTRUCTION NOTICE

Ohio Power Company

Greene-Beatty 345 kV Transmission Line Adjustment

4906-6-05 Accelerated Application Requirements

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

4906-6-05(B) General Information

B(1) Project Description

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 proposes the Greene-Beatty 345 kilovolt (kV) Transmission Line Adjustment Project ("Project") in Pleasant Township, Franklin County, Ohio. The Project involves adding steel extension sections to three existing lattice tower structures to raise the existing conductor. Proposed structure heights will increase by 15 to 20 feet. The non-consecutive structures stretch along approximately 1.2 miles of the existing transmission line. The structures to be raised are within existing right-of-way ("ROW"). The location of the Project is shown in **Figures 1, 2A, and 2B** 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 Case No. 26-0884-EL-BNR.

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B(2) Statement of Need

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

The Company conducted a sag clearance study on 157 miles of existing 345 kV transmission lines including Stuart-Beatty, Stuart - Beatty (A), Greene - Beatty, Stuart - Point O, and Point O - Don Marquis. The sag clearance study identified 88 steel lattice towers that require additional reinforcement to keep them consistent with National Electrical Safety Code (NESC) and AEP standard load cases. While the overall sag remediation study requires re-enforcement of 88 structures, this Project only pertains to three existing structures along the Greene-Beatty 345 kV line; the Company will submit additional OPSB filings for the remaining structures. This project will utilize advanced transmission technologies by using the AMPJACK lift system which will remediate clearance concerns, increase capacity, and improve the safety and reliability of the line without the need for an outage or substantial construction activities.

The conductors on these lines were installed in the 1970s and the original conductors are still in-service. The majority of the structures are steel lattice structures and are approximately 50 years old. After the Company acquired these assets upon the dissolution of CCD, the Company performed the sag clearance study mentioned above. To remediate clearance violations and to maintain the Maximum Operating Temperature ("MOT") of the conductor, there are 88 structures that will need to be reinforced to increase the height of the structures. This relates to approximately 10% of the structures across these lines. When the Company acquired these lines from CCD, the lines were already operating at their maximum capability as designed and rated by CCD. In order to maintain these ratings, the clearances and sag mitigations to bring the line back into AEP standards is required, allowing the line to continue to operate at full capability during high loading or emergency scenarios.

Failure to move forward with this project could result in future thermal violations due to the need to reduce the rating of the line if sag clearance concerns are not addressed. Not performing this work would leave the line out of compliance with NESC and AEP standards, limiting the amount of power that can travel through the line.

There is no operation, modeling, or topology change as a result of the Project; therefore, the Project will not be submitted to PJM. The Project is also not reported in the Long-Term Forecast Report because the Project was unknown at the time of filing.

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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 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 be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The Project installs steel inserts on three existing steel lattice tower structures along an existing 345 kV electric transmission line to increase the height of conductors where clearance violations have been identified. The Company evaluated alternatives to alleviate the clearance violations which included raising or replacing the structures. Raising the existing structures is the most suitable solution for the Project, as other alternatives would require additional or more costly structures or relocating the existing transmission line. By raising the existing structures at their current locations, the proposed Project is not anticipated to impact wetlands, streams, or any known cultural resource areas eligible for the National Register of Historic Places (NRHP). Therefore, this alternative represents the most suitable location and is the most appropriate solution for meeting the Company's needs in the area.

B(5) Public Information Program

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://AEPOhio.com/BeattyStuart/>) on which an electronic copy of this CN is available. An electronic copy of the CN will be served to the public library in each political subdivision affected by this Project. The Company also retains land agents who will discuss project timelines, construction and restoration activities with affected owners and tenants.

B(6) Construction Schedule

Provide an anticipated construction schedule and proposed in-service date of the project.

Construction of the Project is planned to begin in December 2026 with an anticipated in-service date of May 2027.

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B(7) Area Map

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

Figure 1, in Appendix A, identifies the location of the Project area on a United States Geological Survey 1:24,000 quadrangle map of Harrisburg, Ohio. **Appendix A, Figures 2A and 2B** display 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)
230-000216	Existing Easement	Yes
230-002201	Existing Easement	Yes
230-001488	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.

The existing transmission line includes the following operating characteristics:

Voltage: 345kV
Conductors: (right) 2-bundle 983.1 kcmil ACAR 30/7 (Existing)
(left) 2-bundle 1024.5 kcm ACAR 30/7 (Existing)
Static Wire: (2) 7#8 Alumoweld (Existing)
Insulators: Ceramic (Existing)
ROW Width: 150 feet
Structure Type: Three (3) double circuit, steel lattice towers, Type A2

The proposed height increases at each structure for the Project are provided in **Table 2**, below.

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Table 2 – Lattice Tower Height Increases

Structure Number	Proposed Height Increase (feet)
266	20
268	20
273	15

A summary of the proposed process for extending the steel lattice towers is provided in **Appendix B**.

B(9)(b) Electric and Magnetic Fields

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

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

B(9)(c) Project Cost

The estimated capital cost of the project.

The cost estimate for the Project, which is comprised of applicable tangible and capital costs, is approximately \$2,400,000 using a Class 4 estimate. Pursuant to the PJM OATT, the costs for this Project will be recovered in the Ohio Power Company's FERC formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Ecological Impacts

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

B(10)(a) Land Use

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 are primarily agricultural land with scattered woodlots. One of the structures is located on a property owned by the City of Columbus and Franklin County Metropolitan Park District although the property does not appear to be a current public recreational area. An aerial photograph of the Project vicinity is provided as **Figures 2A and 2B**. The Project is mapped within Pleasant Township in Franklin County. The structures to be raised are within existing ROW. The Project vicinity is currently rural in nature and is comprised primarily of agricultural land used for row crops, forested land, landscaped areas, and scattered residences. No tree clearing is anticipated for the Project.

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B(10)(b) Agricultural Land

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 characterized by existing ROW crossing agricultural land use with low density residential land uses dispersed throughout. The dominant agricultural use appears to be row crops (i.e. soybeans and corn). Large, open agricultural fields are present in the Project Area. No permanent impacts to agricultural land are anticipated by raising the existing structures.

Based on data received from the Franklin County Auditor's office on August 11, 2026, there are no agricultural district parcels within the potential disturbance area of the Project. No Ohio Department of Agriculture easements were identified as affected by 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.

A cultural resource survey and report were conducted by the Company's consultant for the Project in January 2023. Correspondence from the State Historic Preservation Office ("SHPO") was received in January 2023, see **Appendix C**. The SHPO stated that 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 3**, below. There are no other known local, state, or federal requirements that must be met prior to commencement of the Project.

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Table 3 – Anticipated Permits

Permit/Authorization/Coordination	Agency	Date
Storm Water Pollution Prevention Plan	Ohio Environmental Protection Agency	March 2026
	Franklin County	
Notice Criteria	Federal Aviation Administration	Submitted through Criteria Tool on 4/17/2026, no further action required.
Clean Water Act Section 404/401	United States Army Corps of Engineers	Not Required
	Ohio Environmental Protection Agency	
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete 2/11/2026, no additional work required
Threatened and Endangered Species	United States Fish and Wildlife Service	Consultation complete 2/8/2023
Threatened and Endangered Species	Ohio Department of Natural Resources	Consultation complete 11/19/2025
Floodplain	Franklin County	2/13/2026

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 January 24, 2023, coordination letters were submitted to the United State Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review of the Project for potential impacts to state and/or federally protected species. ODNR and USFWS provided responses on February 8, 2023, and November 19, 2025, respectively. Copies of the agencies' responses are presented in **Appendix C**.

Table 2, in **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.

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B(10)(f) Areas of Ecological Concern

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

The Company's consultant conducted a wetland and stream delineation survey in the Project study area on November 21, 2022 and prepared an Ecological Survey Report, which is provided in **Appendix D**. The survey of the Project area identified five wetlands and no streams. The Project construction activities are not expected to result in discharge of fill in any of the delineated wetlands as they will be avoided by construction access roads.

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.

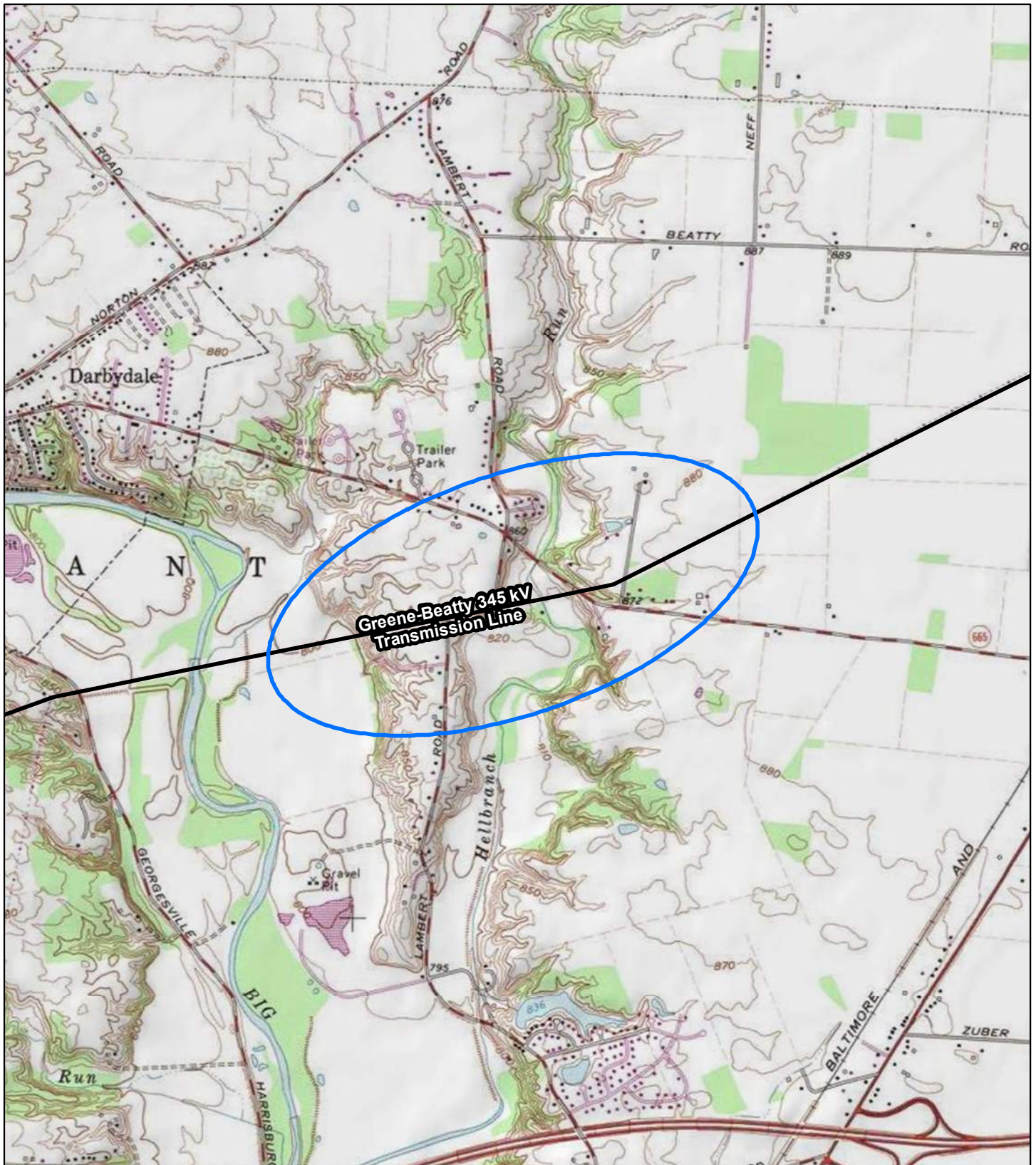
The FEMA Flood Insurance Rate Map ("FIRM") was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map numbers 39129C0150J, 39129C0025J). Based on this mapping, one of the structures is located within the FEMA-designated 100-year flood zone and floodway. The Company coordinated with the local floodplain coordinator to assess the need for a floodplain permit. Franklin County issued a National Flood Insurance Program (NFIP) permit on February 13, 2026. A copy of the permit is provided in **Appendix C**.

B(10)(g) Unusual Conditions

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

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

Appendix A Project Maps



 Project Area
 Existing Transmission Line

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

Ohio State Plane South
 NAD 1983



August 24, 2026

PROJECT LOCATION

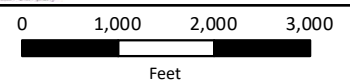


FRANKLIN COUNTY, OHIO

FIGURE 1 TOPOGRAPHIC OVERVIEW



Greene-Beatty 345 kV
 Transmission Line
 Adjustment Project





Legend:

-  Proposed Structure Raise
-  Existing Transmission Line
-  Parcel Boundary

Data Sources: AEP,
ESRI World Imagery, 2022

Ohio State Plane South
NAD 1983



August 24, 2026

PROJECT LOCATION

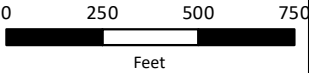


FRANKLIN COUNTY, OHIO

FIGURE 2A
PROJECT AERIAL MAP



Greene-Beatty 345 kV
Transmission Line
Adjustment Project



Appendix B Tower Raise Process Summary



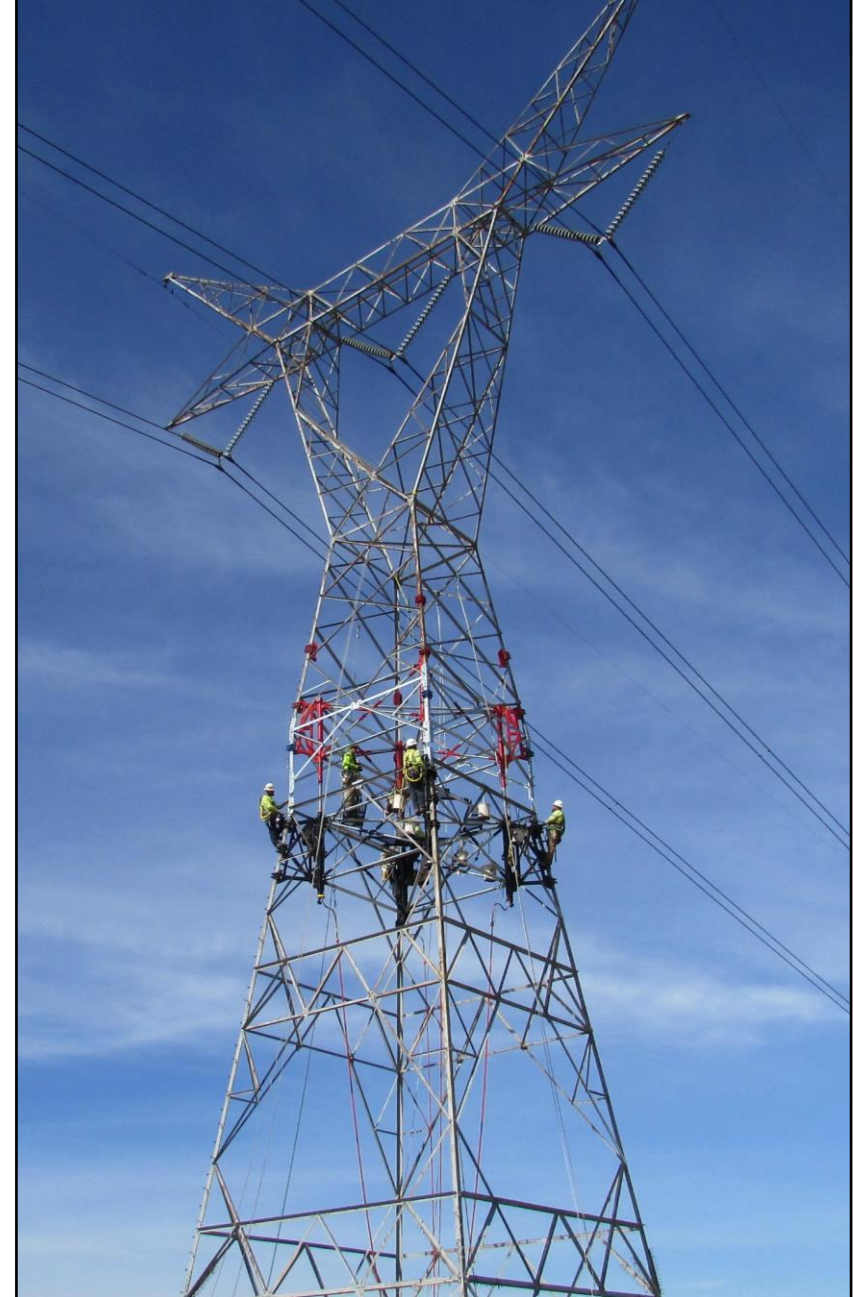
Transmission Line Clearance Enhancement Using the AMPJACK® Lift System



What is the AMPJACK® Lift System

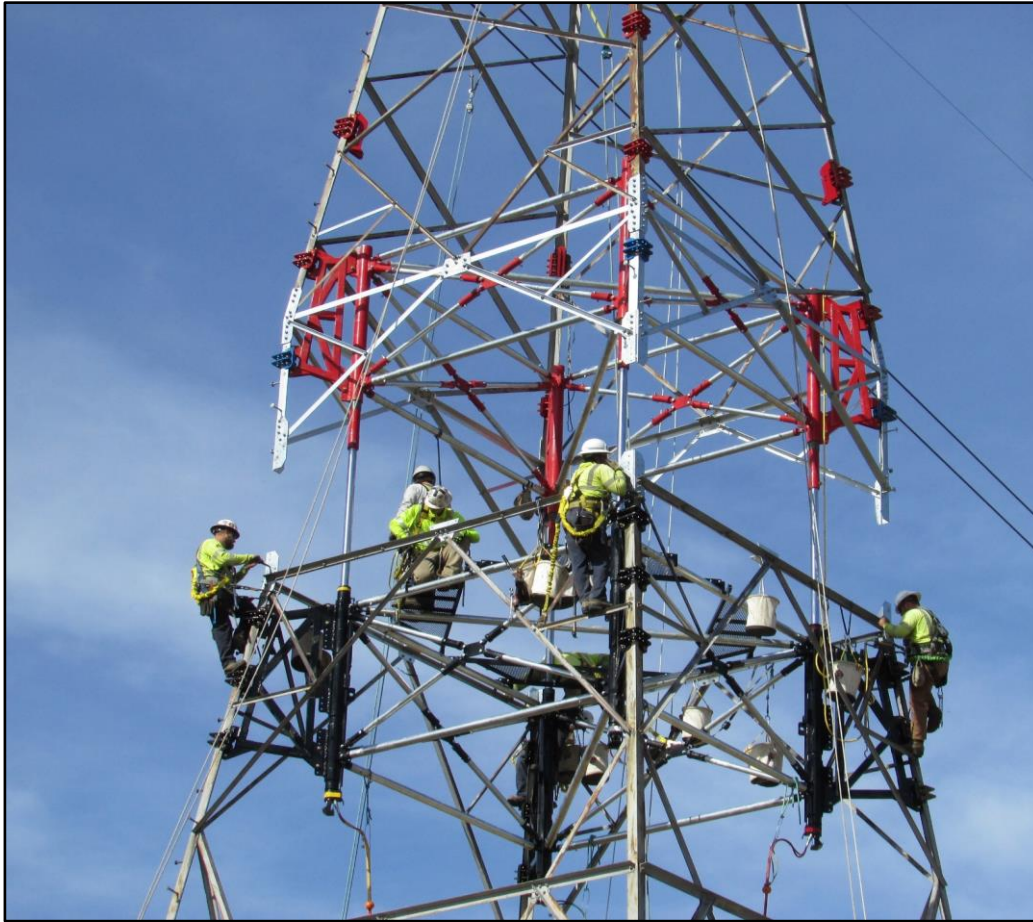
The **AMPJACK® Lift System** is a hydraulically driven, self-contained “crane in a Box” that can be transported and installed easily with minimal environmental impact.

Implemented to increase the height of existing transmission lines without the need of an **Outage.**



AMPJACK® Construction Method

(No Cranes and Minimal Footprint)



- Positive Control = Live Line & Live Load Capabilities
- Eliminates Suspended Loads
- Handles Overturning Loads
Tension/Compression/Shear

AMPJACK® Operational Benefits

- Utilize Existing Structures & Residual Capacity
- Top-Down Engineering
 - Each lift plan evaluates the wire system, structure & foundation
- Increased SAFETY!
 - Tower does not hang from a crane, so there are NO SUSPENDED LOADS!
 - AMPJACK® always maintains positive control of the tower.
- Facilities remain in service, allowing flexibility in scheduling transmission line work.
- Increased productivity—work can be executed at multiple locations in parallel.
- Versatility for efficient integration at tower locations.



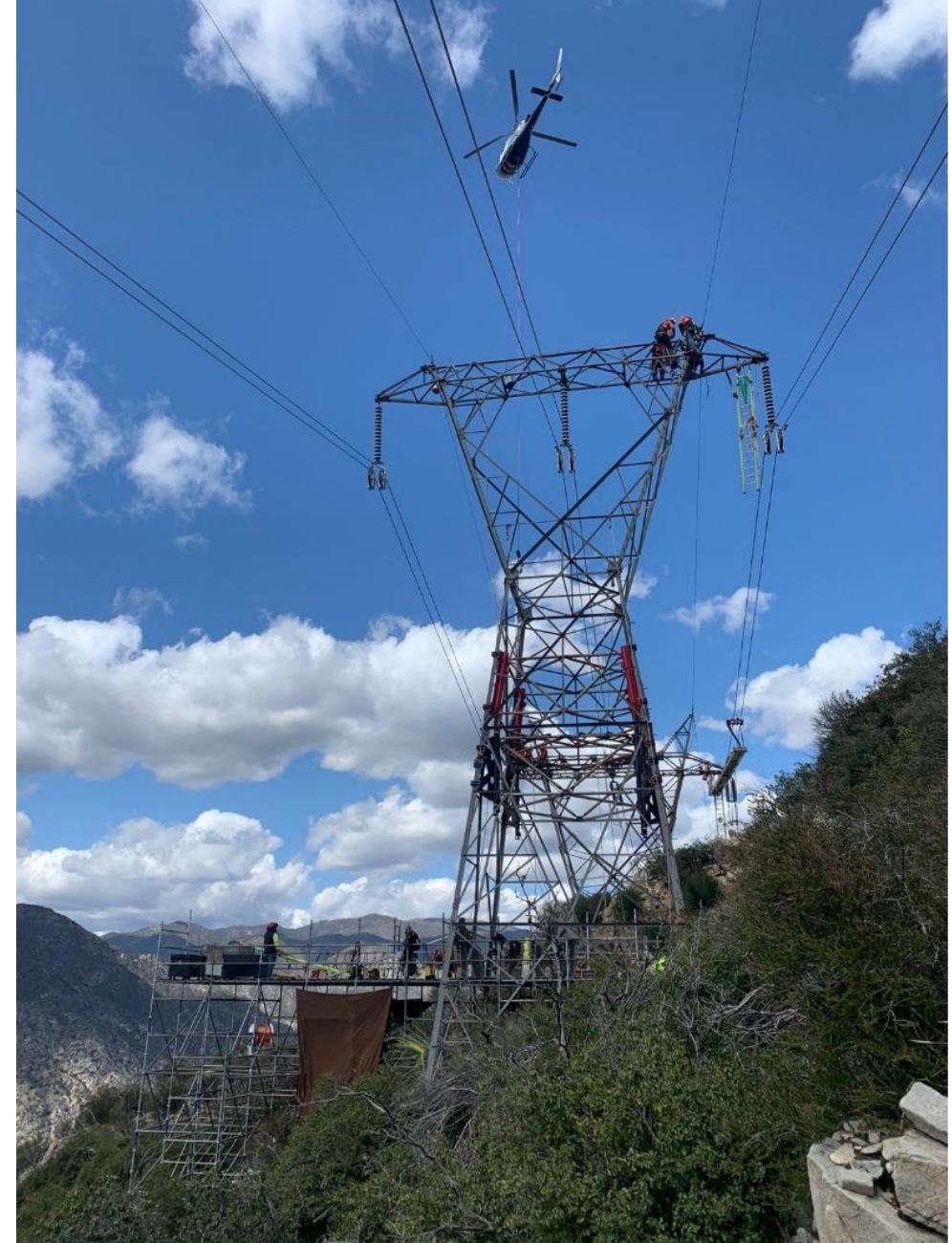
Remote Access Capabilities

Helicopter Access into Remote Areas:

All work at this site included:

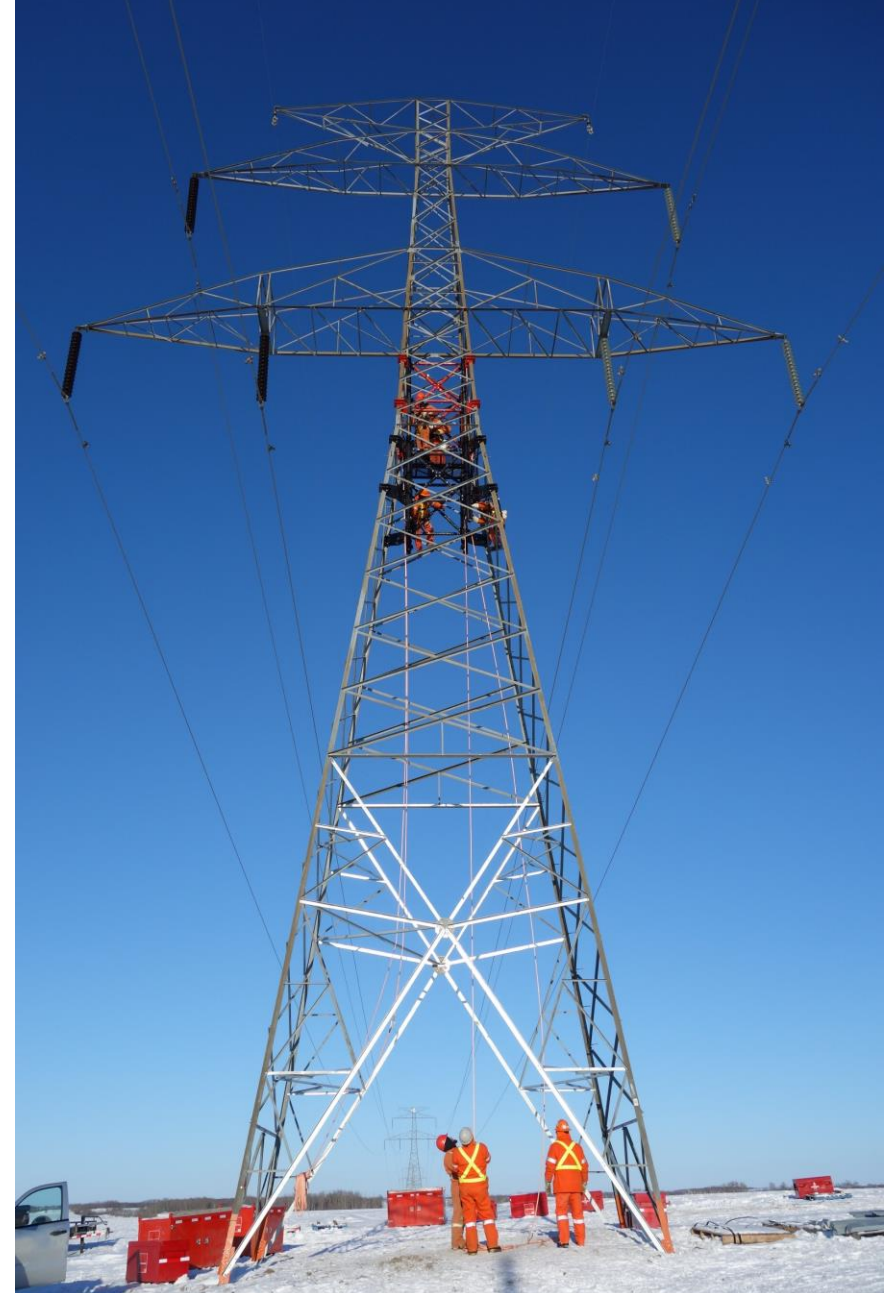
- Custom scaffolding platform installed for crew & equipment access
- Insulator change-outs
- Conductor re-tensioning
- 15Ft. AMPJACK® tower raise completed by helicopter access only

This work caused very little ground disturbance.



AMPJACK® and the *Environment*

- Minimal environmental impact
- No cranes or large aerial equipment needed
- Minimal matting or new access road work required
- Can be installed with a small crew of 10-14
- Install requires only lightweight equipment



Execution

Construction Timelines

- On average, the AMPJACK® system takes...
 - ½ day to 1 ½ days to install – depending on complexity
 - Approx. 2 to 4 hours per 5-ft. lift increment
 - 1 day to remove, clean up and demobilize to next site



Execution



Appendix C Agency Correspondence



In reply, refer to
2023-FRA-56881

January 30, 2023

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

RE: Greene-Beatty 345kV Structure Repair/Replacement Project, Pleasant Township, Franklin County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received January 24, 2023 regarding the proposed Greene-Beatty 345kV Structure Repair/Replacement Project, Pleasant Township, Franklin County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Archaeological Investigations for the Greene-Beatty 345kV Structure Repair/Replacement Project in Pleasant Township, Franklin County, Ohio* by Ryan J. Weller (Weller & Associates, Inc. 2023).

A literature review, visual inspection, surface collection, shovel probe and shovel test unit excavations were completed as part of the investigations. No previously identified archaeological sites are located within the project area. One (1) new archaeological site was identified during survey, Ohio Archaeological Inventory (OAI) #33FR3524. The site is recommended not eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation and no additional archaeological survey is needed. Due to the nature of the proposed project and the lack of built environment around the repair/replacement structures, there are no concern regarding aboveground historic resources for this project.

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

Sincerely,

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

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1096554



In reply, refer to
2026-FRA-67346

February 11, 2026

Ryan J. Weller
Weller & Associates, Inc.
1395 West Fifth Avenue
Columbus, Ohio 43212
rweller@wellercrm.com

RE: Green-Beatty 345kV Sag Study Project, Pleasant Township, Franklin County, Ohio – Structures 266, 268, and 273

Dear Mr. Weller:

This letter is in response to the correspondence received on January 13, 2026, regarding the proposed Green-Beatty Sag Study Project located in Pleasant Township, Franklin County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board (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 Archaeological Investigations for Structures 266, 268, and 273 of the Green-Beatty 345kV Sag Study Project (Part of the Stuart-Beatty 345kV Remediation) in Pleasant Township, Franklin County, Ohio* (Weller & Associates, Inc. 2025). The submission addresses work areas and access roads associated with the proposed maintenance and raising of Structures 266, 268, and 273 as part of the Beatty-Stuart Remediation project. A literature review, visual inspection, and shovel test unit excavations were conducted for these investigations. A 2023 survey investigated much of the current project area and documented one (1) Ohio Archaeological Inventory (OAI) site (33FR3524). This site is not considered eligible for the National Register of Historic Places (NRHP), nor were any new archaeological sites identified during the current survey. Our office agrees no additional archaeological survey is required.

Based on the information provided, it is our office's opinion that the project, as proposed, will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional cultural 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.

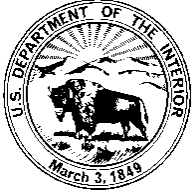
Sincerely,

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. 1112416

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



February 8, 2023

Re: Breene – Beatty 345kV

Project Code: 2023-0028029

Dear Ms. Speckman:

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

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

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

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

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

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

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

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

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

Sincerely,



Patrice Ashfield
Field Office Supervisor



Office of Real Estate & Land Management

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

November 19, 2025

Tanner Dickson
V3 Companies
3700 South Boulevard, Suite 200
Charlotte, North Carolina 28209

Re: 25-1611_#210180.101 Greene Beatty 345kV

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

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

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

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

Spotted Darter (*Etheostoma maculatum*), E
Tippicanoe Darter (*Etheostoma tippecanoe*), SC
Elktoe (*Alasmodonta marginata*), SC
Northern Riffleshell (*Epioblasma rangiana*), E, FE
Snuffbox (*Epioblasma triquetra*), E, FE
Wavy-rayed Lampmussel (*Lampsilis fasciola*), SC
Creek Heelsplitter (*Lasmigona compressa*), SC
Round Hickorynut (*Obovaria subrotunda*), E, FT
Clubshell (*Pleurobema clava*), E, FE
Kidneyshell (*Ptychobranhus fasciolaris*), SC
Deertoe (*Truncilla truncata*), SC
Rayed Bean (*Villosa fabalis*), E, FE

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

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

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

The project is within the vicinity of records for the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree clearing is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree clearing 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 clusters of dead leaves on tree limbs. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree and/or tree limb clearing 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 a Diameter Breast Height (DBH) $\geq 20''$ if possible.

For every project, the DOW also recommends that a winter bat habitat assessment is conducted to determine if potential hibernacula are present within the project area. This is to limit possible disturbances that seasonal tree clearing and/or subsurface work (e.g., trenching, blasting, etc.) may cause to hibernating bats. Potential hibernacula include rocky outcroppings, caves, and underground mines. Direction on how to conduct winter habitat assessments can be found in the joint guidance [OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE \(OH-FIELD OFFICE\) JOINT GUIDANCE FOR BAT SURVEYS](#). If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile permanent tree clearing buffer around the hibernaculum entrance. Limited summer or winter tree clearing may be acceptable after consultation with the DOW. If a habitat assessment for projects involving subsurface disturbance finds that a potential hibernaculum is present within 5 miles of the

project area, please consult with Eileen Wyza for project recommendations. If no tree clearing or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

State Endangered

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

State Threatened

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

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 following listed mussel species.

Federally Endangered

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

Federally Threatened

rabbitsfoot (*Theliderma cylindrica*)

State Endangered

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

State Threatened

pondhorn (*Unio merus tetralasmus*)
Salamander Mussel (*Simpsonia ambigua*)

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 (2025), 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 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, this project is not likely to impact this species.

The project is within the range of the sandhill crane (*Antigone canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). 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 type of habitat will not be impacted, the project is not likely to impact this species.

Due to the potential for 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 not conducted a project specific review and/or comments, however, the guidance provided below should be reviewed by the Environmental Review applicant for applicability on this project and subsequent compliance.

If the subject project is in a floodplain regulated by the Federal Emergency Management Agency (FEMA), the [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals. The FEMA National Flood Hazard Layer (NHFL) Viewer [website](#) can be utilized to see if the project is in a FEMA regulated floodplain. If the project is not in a FEMA regulated floodplain, then no further action is required.

Ohio Revised Code (ORC) Section 1521.16 mandates that any owner of a property or a facility that has the capacity of withdrawing 100,000 gallons per day (gpd) of water from groundwater, surface water, or both must register with the Division of Water Resources' [Water Withdrawal Facilities Registration \(WWFR\) Program](#) and report their withdrawals annually.

Additional coordination may be required depending on the location of the withdrawal and consumptive use. Restrictions or permitting may be required for:

- New or increased consumptive use of water averaging 2 million gallons per day (mgd) within 30 days within the Ohio River basin.
- New or increased withdrawal and consumptive water use in the Lake Erie watershed averaging 1 million gallons per day (mgd) or more in 90 days.
- New or increased water withdrawal directly from Lake Erie averaging 2.5 million gallons per day (mgd) or more in 90 days.
- Diversion or movement of water across the Ohio River and Lake Erie basin divide.

If the project does not involve activities that are subject to water withdrawal regulatory requirements as described above, then no further action is required. For more information, visit the [Water Inventory & Planning website](#).

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.



Franklin County
Board of Commissioners

ECONOMIC DEVELOPMENT & PLANNING

Economic Development & Planning Department
James Schimmer, Director

Application for

NFIP Permit

For new development

Page 1 of 4

FEMA Community #390167

RECEIVED

JAN 23 2026

Franklin County Planning Department
Franklin County, OH



Property Information

Site Address: West of Lambert Road

Parcel ID(s): 230-000216-00

Total Acreage: 0.49 within floodplain
2.21 overall project

Township: Pleasant

Property Owner Information - Work to occur within AEP easement

Name: Board of Park Commissioners of the Columbus & Franklin County Metropolitan Park

Address: 1069 W Main Street

Westerville, OH 43081

Phone #

Fax #

Email:

Project Proposal

NFIP Watercourse: Big Darby Creek

FIRM Panel #: 39049C0385K

Base Flood Elevation: 804 ft

Flood Protection Elevation:

Project Description

The project proposes to raise existing utility structures along the Greene - Beatty transmission line. No permanent fill is planned at the bases of the structures. One structure is located within a mapped floodplain. The portion of the project within the floodplain is located west of Lambert Road, south of the intersection with London Groveport Road. Access to the structure will require installation of timber matting from Lambert Road and extending west to the structure. The project is anticipated to occur in Quarter 2 of 2026 with a duration of approximately one month. The timber mat will be removed and the area will be restored upon completion of construction. The timber matting is anticipated to protect the area, however, restoration will include installing seed mix, as needed.

Statement of Understanding

I/We have read and understand the requirements as listed above and I/we have met with the Franklin County Development Department prior to filing this application. I/We understand that additional materials may be requested as part of the review process.

Applicant Signature Jennifer Walker Date 12-5-2025

Approval

NFIP Permit issued by the Franklin County Economic Development and Planning Department under the authority of the Franklin County NFIP Application

☒ Approved

☐ Denied

Raimere Fitzpatrick

02/13/2026

Signature

Date

150 South Front Street, FSL Suite 10, Columbus, Ohio, 43215-7104
Tel: 614-525-3094 Fax: 614-525-7155 Development.FranklinCountyOhio.gov

Staff Use Only

Case #

Date Filed:

Fee Paid:

Receipt #

Received By:

BZA Case #:

BZA Hearing Date:

Elevation Certificate Received Date:

Flood Zone

☐ A

☒ AE

☐ AH

☐ AO

☐ X (shaded)

☐ X (unshaded)

All timber matting shall be properly anchored in accordance with applicable FEMA guidelines to prevent floatation. All areas of ground disturbance shall be restored to pre-development grade and conditions as indicated in the project description above.



Franklin County
Board of Commissioners

ECONOMIC DEVELOPMENT & PLANNING

Economic Development & Planning Department
James Schimmer, Director

Application for

NFIP Permit

For new development

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FEMA Community #390167



Engineer/Surveyor Information

Name: Connor Hull

Address: 8600 Smiths Mill Road

New Albany, OH 43054

Phone # 614-356-0332

Fax #

Email: chull@aep.com

Applicant Information

☐ Same as property owner

☐ Same as engineer/surveyor

Name: Jennifer Walker

Address: 1 Riverside Plaza

Columbus, OH 43215

Phone # 614-933-2639

Fax #

Email: jlwalker2@aep.com



Franklin County
Board of Commissioners

ECONOMIC DEVELOPMENT & PLANNING

Economic Development & Planning Department
James Schimmer, Director

Application for NFIP Permit

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Franklin County Economic Development and Planning Department National Flood Insurance Program (NFIP) Permit Requirements

Any applicant who proposes floodplain development is solely responsible for filing all materials required by the application in its entirety. Please consult with the Franklin County Economic Development and Planning Department and obtain a copy of all applicable floodplain regulations and development standards prior to filing a NFIP permit application. An incomplete application will not be reviewed until such time all relevant material has been submitted. Permits approved on the basis of applications, plan specifications and other information shall authorize only the use arrangement, and construction set forth therein.

General Application Requirements in Designated AE and AH Zones

- Two (2) copies of the completed application form.
- Two (2) copies of the development plan showing the nature, location, dimensions, and details of the property, development activities and existing/proposed land use. A development plan must include the following information:
 - a. *Names of applicant and engineer with their respective addresses and phone numbers*
 - b. *Street address and Tax District/Parcel Number of the subject property*
 - c. *Present use and proposed use*
 - d. *Adjacent building locations*
 - e. *North arrow*
 - f. *Scale of drawing, use suitable standard scale*
 - g. *Floodway and floodplain boundaries*
 - h. *Dimensions and locations of property lines, existing buildings, proposed buildings and placement of fill and other pertinent features*
- Elevation in relation to mean sea level of the lowest floor, including basement, of all proposed structures located in special flood hazard areas where base flood elevation data are utilized.
- Elevation in relation to mean sea level to which any proposed structure will be floodproofed where base flood elevation data are utilized including certification by a registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet the floodproofing criteria required by Franklin County's National Flood Insurance Program Resolution.
- Existing base flood elevations.
- Existing and proposed topographical information.
- Description of the extent to which any watercourse will be altered or relocated as a result of the proposed development and certification by a registered professional engineer that the flood carrying capacity of the watercourse will not be diminished.
- Certification by a registered professional engineer, architect, or surveyor of the structure's as-built lowest floor or floodproofed elevation.
- Certification of finished elevations, and/or other proofs or assurances of compliance with approved plans.
- Information demonstrating compliance with the General Development Standards of Section 4.0 of the Franklin County NFIP regulation
- Any additional information or exhibits deemed necessary for proper consideration of the application

Appendix D Ecological Survey Reports

GREENE - BEATTY 345kV

ECOLOGICAL REPORT



PROJECT SITE:

Beginning at London Groveport Road and U.S. 62 North
Extending to Lambert Road and London Groveport Road
Franklin County, Ohio

PREPARED FOR:

AEP Ohio Transmission Company, Inc.
8600 Smiths Mill Road
New Albany, Ohio 43054



An **AEP** Company

BOUNDLESS ENERGY™

PREPARED BY:

V3 Companies, Ltd.
619 North Pennsylvania Street
Indianapolis, Indiana 46204
(317) 423-0690

February 2023

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EXECUTIVE SUMMARY

V3 Companies, Ltd. (V3) performed an ecological survey and report for the proposed Greene – Beatty 345kV project on 21 November 2022. The project consists of four existing structures and associated access routes beginning at London Groveport Road and U.S. 62 North and extending to Lambert Road and London Groveport Road in Franklin County, Ohio (SITE). V3 reached the following conclusions based on review of available and reasonably ascertainable federal, state, and local resources, and a SITE inspection conducted on the date referenced above.

- Five wetlands, WL-275A-PSS, WL-275B-PSS, WL-275C-PSS, WL-275D-PEM, and WL-267-PEM were identified within the SITE area. All five wetlands appeared to lack a hydrologic connection with any federally jurisdictional “Waters of the U.S.” and would likely be considered isolated and subject to regulation by the Ohio Environmental Protection Agency (OEPA).
- No streams or other potential “Waters of the U.S.” were observed on-SITE.
- An official species list obtained from the United States Fish and Wildlife Service (USFWS) Information Planning and Consultation (IPaC) website indicated that the SITE is within the ranges of the federally endangered Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), clubshell (*Pleurobema clava*), northern riffleshell (*Epioblasma torulosa rangiana*), rayed bean (*Villosa fabalis*), and snuffbox mussel (*Epioblasma triquetra*), the proposed endangered tricolored bat (*Perimyotis subflavus*), the federally threatened rabbitsfoot (*Quadrula cylindrica cylindrica*), and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. V3 did not observe potential roost trees on-SITE at the time of the SITE reconnaissance. The USFWS made recommendations to avoid impacts to on-SITE stream and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside the recommended seasonal clearing dates. The USFWS stated the due to the project, type, size, and location, the agency does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.
- A review of the Ohio Natural Heritage Database with the Ohio Department of Natural Resources (ODNR) indicates records of the four federally endangered species, one state endangered species, and three state species of concern within one mile of the specified project area. Additionally, the ODNR Division of Fish and Wildlife stated that the project is within range of 26 threatened or endangered species. The ODNR stated that the project is not likely to impact these species and provided recommendations to avoid and minimize impact to these species and their habitats.

CHAPTER 1 INTRODUCTION

This report has been prepared solely in accordance with an agreement between American Electric Power (“CLIENT”) and V3 Companies (“V3”), Ltd.

The services performed by V3 have been conducted in a manner consistent with the level of quality and skill generally exercised by members of its profession and consulting practices relating to this type of engagement.

This report is solely for the use of CLIENT and was prepared based upon an understanding of CLIENT’s specific objective(s) and based upon information obtained by V3 in furtherance of CLIENT’s specific objective(s). Any reliance of this report by third parties shall be at such third party's sole risk as this report may not contain, or be based upon, sufficient information for purposes of other parties, for their objectives, or for other uses. This report shall only be presented in full and may not be used to support any other objectives than those for CLIENT as set out in the report, except where written approval and consent are expressly provided by CLIENT and V3.

1.1 INTRODUCTION

The purpose of this investigation was to conduct an ecological survey and report of the SITE to evaluate potential land development permitting requirements regarding natural resources. In this report, V3 provides a detailed description of the information reviewed and collected as part of the scope of work for this project. V3 summarizes the jurisdictional framework applicable to this project, provides a desktop review of relevant and publicly available documents, and details information collected during the SITE reconnaissance including a wetlands determination, an evaluation of the potential presence of other natural resources within the SITE boundary, and a discussion of endangered, threatened, and rare (ETR) species and habitat. The Conclusions section summarizes V3’s findings, addresses potential areas of concern and permitting, regulatory, and other relevant issues.

The SITE begins at London Groveport Road and U.S. 62 North and extends to Lambert Road and London Groveport Road in Franklin County, Ohio (**Figure 1**).

CHAPTER 2 JURISDICTIONAL RESOURCES

2.1 WETLANDS

Wetlands offer a variety of functions and values that may include, but are not limited to, groundwater recharge/discharge, flood flow alteration, sediment/toxicant retention, and fish and wildlife habitat. Because of the perceived functions and values of wetlands, USACE developed the Wetlands Delineation Manual, (*1987 Manual*)¹ to identify wetlands.

Wetlands are defined in the *1987 Manual* as, “Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.”² The *1987 Manual* outlines the protocol for distinguishing wetland areas from “upland” areas. Wetland areas are delineated according to three primary criteria: vegetation, soil, and hydrology. An area is determined to qualify as a wetland if it meets the following “general diagnostic environmental characteristics:”

- Hydrophytic vegetation
- Hydrology
- Hydric Soil

¹ USACE. Waterways Experiment Station. Wetlands Research Program. “Corps of Engineers Wetlands Delineation Manual.” Vicksburg, MS: Environmental Laboratory, 1987

CHAPTER 3 DESKTOP REVIEW

V3 reviewed applicable, readily available, and accessible historical information for the potential presence of wetlands, “Waters of the U.S.,” and other natural resources.

3.1 UNITED STATES GEOLOGICAL SURVEY 7.5-MINUTE QUADRANGLE MAP

A USGS 7.5-Minute Quadrangle map displays contour lines to portray the shape and elevation of the land surface. Quadrangle maps render the three-dimensional changes in elevation of the terrain on a two-dimensional surface. The maps usually portray both manmade and natural topographic features. Although they show lakes, rivers, various surface water drainage trends, vegetation, etc., they typically do not provide the level of detail needed for accurate evaluation of wetlands. However, the existence of these features may suggest the potential presence of wetlands.

The SITE is situated in Harrisburg, Ohio, USGS 7.5-Minute Quadrangle Map. V3 evaluated the topography and concluded that the SITE elevation ranges from approximately 800 to 885 feet above mean sea level. No features are mapped within the SITE area (**Figure 1**).

3.2 NATIONAL WETLANDS INVENTORY MAP

National Wetlands Inventory (NWI) maps were developed to meet a USFWS mandate to map the wetland and deepwater habitats of the U.S. These maps were developed using high altitude aerial photographs and USGS Quadrangle maps as a topographic base. Indicators that exhibited pre-determined wetland characteristics, visible in the photographs, were identified according to a detailed classification system. The NWI map retains some of the detail of the Quadrangle map; however, it is used primarily for demonstration of wetland areas identified by the agency. The maps are accurate to a scale of 1:24,000. In general, the NWI information requires field verification.

NWI data is shown projected over aerial photography in **Figure 2**. One NWI palustrine, forested, broad-leaved deciduous, temporary flooded (PFO1A) polygon is mapped to the north of Structure 275. The presence of NWI features mapped partially or fully within the SITE area suggests the potential presence of wetlands or other regulated aquatic features on-SITE.

3.3 FLOOD INSURANCE RATE MAP

The Federal Emergency Management Agency (FEMA) was developed in 1979 to reform disaster relief and recovery, civil defense, and to prepare and mitigate for natural hazards. The Mitigation Division of FEMA manages the National Flood Insurance Program which provides guidance on how to lessen the impact of disasters on communities through flood insurance, floodplain management, and flood hazard mapping. Proper floodplain management has the ability to minimize the extent of flooding and flood damage and improve stormwater quality by reducing stormwater velocities and erosion. The one percent annual chance flood (100-year flood) boundary must be kept free of encroachment as the national standard for the program.

V3 reviewed National Flood Hazard Zone data for Franklin County, Ohio. The area surrounding Structure 266 is situated within an area mapped as Flood Zone AE and a Floodway (**Figure 2**).

3.4 UNITED STATES DEPARTMENT OF AGRICULTURE SOIL SURVEY

V3 reviewed the soils mapped on-SITE in the Natural Resource Conservation Service (NRCS) digital soil survey data for Franklin County, Ohio. This data is projected over aerial photography, illustrating distinct soil map unit boundaries, in **Figure 3**. Eight soil units are classified on-SITE in Franklin County.

Table 1 : Soil Units On-SITE

Map Soil Symbol	Description	Hydric Soil in Franklin County
CeB	Celina silt loam, 2 to 6 percent slopes	No
CpA	Crane silt loam, 0 to 2 percent slopes	No
CrA	Crosby silt loam, Southern Ohio Till Plain, 0 to 2 percent slopes	No
HeF2	Hennepin and Miamian loams, 25 to 50 percent slopes, eroded	No
Ko	Kokomo silty clay loam, 0 to 2 percent slopes	Yes
LeB	Lewisburg-Crosby complex, 2 to 6 percent slopes	No
MIC2	Miamian silty clay loam, 6 to 12 percent slopes, eroded	No
So	Sloan silt loam, Columbus Lowland, 0 to 2 percent slopes, frequently flooded	Yes

Two of the soil units mapped within the SITE area, Kokomo silty clay loam, 0 to 2 percent slopes (Ko) and Sloan silt loam, Columbus Lowland, 0 to 2 percent slopes (So) are considered hydric in Franklin County, Ohio. Soils are considered hydric if more than 50 percent of the soil contains hydric components according to the NRCS Web Soil Survey. The presence of hydric soil units within the SITE area suggests appropriate wetland soils are located on-SITE.

3.5 ENDANGERED, THREATENED, AND RARE SPECIES EVALUATION

An official species list obtained from the USFWS IPaC website indicated that the SITE is within the ranges of the federally endangered Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), clubshell (*Pleurobema clava*), northern riffleshell (*Epioblasma torulosa rangiana*), rayed bean (*Villosa fabalis*), and snuffbox mussel (*Epioblasma triquetra*), the proposed endangered tricolored bat (*Perimyotis subflavus*), the federally threatened rabbitsfoot (*Quadrula cylindrica cylindrica*), and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside the recommended seasonal clearing dates. The USFWS stated the due to the project, type, size, and location, the agency does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.

A review of the Ohio Natural Heritage Database with the ODNR indicates records of the four federally endangered species, one state endangered species, and three state species of concern within one mile of the specified project area. Additionally, the ODNR Division of Fish and Wildlife stated that the project is within range of 26 threatened or endangered species. The ODNR stated that the project is not likely to impact these species and provided recommendations to avoid and minimize impact to these species and their habitats.

Based on the documentation referenced above, additional correspondence with the agencies does not appear to be warranted at this time. If federal permitting or federal financing will be used in future development, additional coordination may be necessary. Copies of agency correspondence can be referenced in **Appendix A**.

Table 2 : ETR Species Table

Scientific Name	Common Name	State Listed Status	Federally Listed Status	Typical Habitat Description	Habitat Observed In Survey Area	Avoidance Dates	Agency Comment (Appendix A)	Potential Impacts
Mussels								
<i>Epioblasma torulosa rangiana</i>	Northern riffleshell	Endangered	Endangered	Perennial streams	No	N/A	ODNR - Proposed project not likely to impact this species.	No
<i>Epioblasma triquetra</i>	Snuffbox	Endangered	Endangered	Perennial streams	No	N/A		No
<i>Lampsilis fasciola</i>	Wavy-rayed Lampermussel	Species of Concern	N/A	Perennial streams	No	N/A		No
<i>Pleurobema clava</i>	Club shell	Endangered	Endangered	Perennial streams	No	N/A		No
<i>Ptychobranhus fasciolaris</i>	Kidneyshell	Species of Concern	N/A	Perennial streams	No	N/A		No
<i>Villosa fabalis</i>	Rayed bean	N/A	Endangered	Perennial streams	No	N/A		No
<i>Epioblasma o. obliquata</i>	Purple cat's paw	N/A	Endangered	Perennial streams	No	N/A		No
<i>Quadrula cylindrica cylindrica</i>	Rabbitsfoot	N/A	Threatened	Perennial streams	No	N/A		No
<i>Elliptio crassidens crassidens</i>	Elephant-ear	Endangered	N/A	Perennial streams	No	N/A		No
<i>Lampsilis ovata</i>	Pocketbook	Endangered	N/A	Perennial streams	No	N/A		No
<i>Fusconaia maculata maculate</i>	Long solid	Endangered	N/A	Perennial streams	No	N/A		No
<i>Megaloniaias nervosa</i>	Washboard	Endangered	N/A	Perennial streams	No	N/A		No
<i>Pleurobema cordatum</i>	Ohio pigtoe	Endangered	N/A	Perennial streams	No	N/A		No
<i>Unio merus tetralasmus</i>	Pondhorn	Threatened	N/A	Perennial streams	No	N/A		No
<i>Simpsoniaias ambigua</i>	Salamander Mussel	Threatened	N/A	Perennial streams	No	N/A		No

Fishes								
<i>Etheostoma maculatum</i>	Spotted darter	Endangered	N/A	Perennial streams	No	15 March to 30 June	ODNR - Proposed project not likely to impact this species.	
<i>Etheostoma tippecanoe</i>)	Tippecanoe Darter	Species of Concern	N/A	Perennial streams	No	15 March to 30 June		
<i>Hiodon alosoides</i>	Goldeye	Endangered	N/A	Perennial streams	No	15 March to 30 June		No
<i>Lepisosteus platostomus</i>	Shortnose gar	Endangered	N/A	Perennial streams	No	15 March to 30 June		No
<i>Etheostoma exile</i>	Iowa darter	Endangered	N/A	Perennial streams	No	15 March to 30 June		No
<i>Ichthyomyzon fossor</i>	Northern brook lamprey	Endangered	N/A	Perennial streams	No	15 March to 30 June		No
<i>Exoglossum laurae</i>	Tonguetied minnow	Endangered	N/A	Perennial streams	No	15 March to 30 June		No
<i>Notropis ariommus</i>	Popeye shiner	Endangered	N/A	Perennial streams	No	15 March to 30 June		No
<i>Erimyzon sucetta</i>	Lake chubsucker	Threatened	N/A	Perennial streams	No	15 March to 30 June		No
<i>Polyodon spathula</i>	Paddlefish	Threatened	N/A	Perennial streams	No	15 March to 30 June		No
Birds								
<i>Circus hudsonis</i>	Northern harrier	Endangered	N/A	Common migrant and winter species. Nesters occasionally breed in large marshes and grasslands. Hunt over grasslands.	No	15 April to 31 July	ODNR – If habitat will be impacted, construction should be avoided during this species’ nesting period of 15 April to 31 July. If this habitat will not be impacted, this project is not likely to impact this species.	No

Mammals								
<i>Myotis lucifugus</i>	Little brown bat	Endangered	N/A	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	No	1 April to 30 September	ODNR/USFWS - Cutting of trees is recommended between 1 October and 31 March. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between 1 June and 15 August. ODNR - If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the project area, please send this information to Erin Hazelton for project recommendations. If a potential or known hibernaculum is found, the Division of Wildlife (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.	No
<i>Myotis septentrionalis</i>	Northern long-eared bat	Endangered	Threatened		No			
<i>Myotis sodalis</i>	Indiana bat	Endangered	Endangered		No			
<i>Perimyotis subflavus</i>	Tricolored bat	Endangered	N/A		No			

CHAPTER 4 SITE RECONNAISSANCE

4.1 METHODOLOGY

V3 conducted a field investigation at the SITE on 21 November 2022. During this investigation, V3 noted the presumed land use of the SITE and surrounding area and evaluated the SITE for the potential presence of wetlands, “waters of the U.S.,” and natural resources using the findings of the desktop review and field observations. Photographs were taken during the field investigation and are provided in **Appendix B**.

V3 used the Routine Determination Method (RDM) with an established baseline and transects as described in the *1987 Manual* for typical sites over five acres. V3 recorded data from a number of data points (DP) along the transect as a function of diversity of vegetation, property size, soil types, habitat variability, and other SITE features as deemed appropriate by V3. Where evidence of a wetland was suspected, three wetland criteria were applied to determine if the area in question was representative of a wetland using the methodology set forth by USACE. More specifically, V3 visually examined and recorded the dominant vegetation, recorded soil properties such as texture and color using the Munsell Soil Color Chart (Munsell Color Chart), excavated soil pits, and evaluated the primary and secondary hydrologic indicators as discussed in **Section 2.1.2**.

If all three criteria were met, i.e. vegetation, soil properties, and hydrologic indicators, a second DP was established adjacent to the wetland DP in an area outside of the presumed wetland boundary for the purpose of delineating between the wetland and non-wetland areas. Once delineated, V3 continued the RDM to evaluate the remainder of the SITE.

4.2 SITE AND ADJACENT PROPERTY LAND USE

Land use on-SITE is dominated by fallow and agricultural land. Adjacent land use consists of agricultural land, woodland, residential areas, fallow land, and turf.

4.3 WETLAND SUMMARY

Five wetlands were identified during this investigation based upon the methodology set forth in the *1987 Manual* and the *Midwest Regional Supplement*. Information that V3 collected at each DP on 21 November 2022 is described in the following section. This information is summarized on the forms provided in **Appendix C**. The Ohio Rapid Assessment Method (ORAM) form for each of the wetlands is included as **Appendix D**. An overall SITE delineation map showing placement of the DPs is included as **Figure 4**.

4.3.1 Wetland WL-275A-PSS – (± 0.32 -acre PSS)

Wetland WL-275A-PSS was situated southwest of Structure 275 and consisted of approximately 0.32 acres of PSS. Wetland WL-275A-PSS did not appear to have a hydrologic connection with any federally jurisdictional “Waters of the U.S.,” and as such would likely be considered isolated and subject to regulation by OEPA. WL-275A-PSS has an ORAM score of 35 and is classified as a Category 2 wetland (**Appendix D**).

DP-275A-PSS

This DP was collected in the southern portion of Wetland WL-275A-PSS. All three criteria were met which qualifies this area as a wetland. The dominant vegetation for each stratum present consisted of green ash (*Fraxinus pennsylvanica*, FACW, 70%), reed canary grass (*Phalaris arundinacea*, FACW, 20%),



white panicle aster (*Symphyotrichum lanceolatum*, FAC, 20%), crested sedge (*Carex cristatella*, FACW, 10%). The soil profile met the redox dark surface (F6) indicator for hydric soil. Evidence of wetland hydrology included water marks (B1) and oxidized rhizospheres on living roots, geomorphic position (D2), and FAC-neutral test (D5).

DP-275A-UPL

This DP was collected in the upland area adjacent to DP-275A-PSS. This area did not meet all wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of common blackberry (*Rubus allegheniensis*, FACU, 3%), green ash (FACW, 3%), Canada goldenrod (*Solidago canadensis*, FACU, 35%), fuller's teasel (*Dipsacus fullonum*, FACU, 20%), and yellow foxtail (*Setaria pumila*, FAC, 20%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

4.3.2 Wetland WL-275B-PSS – (± 0.06 -acre PSS)

Wetland WL-275B-PSS was situated southwest of Structure 275 and consisted of approximately 0.06 acre of PSS. Wetland WL-275B-PSS did not appear to have a hydrologic connection with any federally jurisdictional "Waters of the U.S.," and as such would likely be considered isolated and subject to regulation by OEPA. WL-275B-PSS has an ORAM score of 36 and is classified as a Category 2 wetland (Appendix D).

DP-275B-PSS

This DP was collected in the northwest portion of Wetland WL-275B-PSS. All three criteria were met which qualifies this area as a wetland. The dominant vegetation for each stratum present consisted of sugar maple (*Acer saccharinum*, FACW, 50%), green ash (FACW, 20%), eastern cottonwood (*Populus deltoides*, FAC, 20%), wood reed grass (*Cinna arundinacea*, FACW, 30%), and white panicle aster (FAC, 20%). The soil profile met the redox dark surface (F6) indicator for hydric soil. Evidence of wetland hydrology included oxidized rhizospheres on living roots, geomorphic position (D2), and FAC-neutral test (D5).

DP-275B-UPL

This DP was collected in the upland area adjacent to DP-275B-PSS. This area did not meet all wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of common blueberry (FACU, 20%), Canada goldenrod (FACU, 50%), fuller's teasel (FACU, 20%), and white panicle aster (FAC, 20%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

4.3.3 Wetland WL-275C-PSS – (± 0.04 -acre PSS)

Wetland WL-275C-PSS was situated west of Structure 275 and consisted of approximately 0.04 acres of PSS. Wetland WL-275C-PSS did not appear to have a hydrologic connection with any federally jurisdictional "Waters of the U.S.," and as such would likely be considered isolated and subject to regulation by OEPA. WL-275C-PSS has an ORAM score of 35 and is classified as a Category 2 wetland (Appendix D).

DP-275C-PSS

This DP was collected in the eastern portion of Wetland WL-275C-PSS. All three criteria were met which qualifies this area as a wetland. The dominant vegetation for each stratum present consisted of green ash (FACW, 50%), sandbar willow (*Salix interior*, FACW, 30%), wood reed grass (FACW, 30%), and white panicle aster (FAC, 20%). The soil profile met the redox dark surface (F6) indicator for hydric soil.



Evidence of wetland hydrology included oxidized rhizospheres on living roots, geomorphic position (D2), and FAC-neutral test (D5).

DP-275C-UPL

This DP was collected in the upland area adjacent to DP-275C-PSS. This area did not meet all wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of common blackberry (FACU, 50%), Amur honeysuckle (*Lonicera maackii*, UPL, 20%), white panicle aster (FAC, 10%), Canada wildrye (FACU, 10%), white avens (*Geum canadense*, FAC, 10%), and giant ragweed (*Ambrosia trifida*, FAC, 10%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

4.3.4 Wetland WL-275D-PEM – (± 0.07 -acre PEM)

Wetland WL-275D-PEM was situated southeast of Structure 275 and consisted of approximately 0.07 acre of palustrine emergent wetland (PEM). Wetland WL-275D-PEM did not appear to have a hydrologic connection with any federally jurisdictional “Waters of the U.S.,” and as such would likely be considered isolated and subject to regulation by OEPA. WL-275D-PEM has an ORAM score of 32 and is classified as a Category 2 wetland (**Appendix D**).

DP-275D-PEM

This DP was collected in the southern portion of Wetland WL-275D-PEM. All three criteria were met which qualifies this area as a wetland. The dominant vegetation for each stratum present consisted of green ash (FACW, 5%), sandbar willow (FACW, 5%), reed canary grass (FACW, 30%), wood reed grass (FACW, 20%), sensitive fern (*Onoclea sensibilis*, FACW, 20%), and Frank’s sedge (*Carex frankii*, OBL, 20%). The soil profile met the redox dark surface (F6) indicator for hydric soil. Evidence of wetland hydrology included oxidized rhizospheres on living roots, geomorphic position (D2), and FAC-neutral test (D5).

DP-275D-UPL

This DP was collected in the upland area adjacent to DP-275D-PEM. This area did not meet all wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of eastern cottonwood (FAC, 30%), common blackberry (FACU, 15%), reed canary grass (FACW, 30%), and Canada goldenrod (FACU, 30%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

4.3.5 Wetland WL-267-PEM – (± 0.08 -acre PEM, Continues Off-SITE)

Wetland WL-267-PEM was situated southwest of Structure 267 and consisted of approximately 0.08 acres of PEM and continues off-SITE to the south. Wetland WL-267-PEM did not appear to have a hydrologic connection with any federally jurisdictional “Waters of the U.S.,” and as such would likely be considered isolated and subject to regulation by OEPA. WL-267-PEM has an ORAM score of 25 and is classified as a Category 1 wetland (**Appendix D**).

DP-267-PEM

This DP was collected in the northern portion of Wetland WL-267-PEM. All three criteria were met which qualifies this area as a wetland. The dominant vegetation for each stratum present consisted of reed canary grass (FACW, 70%) and barnyard grass (*Echinochloa crus-galli*, FACW, 30%). The soil profile met the redox dark surface (F6) indicator for hydric soil. Evidence of wetland hydrology included geomorphic position (D2) and FAC-neutral test (D5).



DP-267-UPL

This DP was collected in the upland area adjacent to DP-267-PEM. This area did not meet all wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of Japanese bristlegrass (*Setaria faberi*, FACU, 70%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

Table 3: Delineated Wetlands Identified within the Survey Area

Wetland ID	Location		Isolated?	Habitat Type	Delineated Area (acre)	ORAM		Proposed Impacts	
	Latitude	Longitude				Score	Category	Temporary Matting Area (acre)	Permanent Impact Area (acre)
WL-275A-PSS	39.85130°	-83.14166°	Yes	PSS	±0.32	35	2	TBD	TBD
WL-275B-PSS	39.85140°	-83.14112°	Yes	PSS	±0.06	36	2	TBD	TBD
WL-275C-PSS	39.85173°	-83.14085°	Yes	PSS	±0.04	35	2	TBD	TBD
WL-275D-PEM	39.85164°	-83.14038°	Yes	PEM	±0.07	32	2	TBD	TBD
WL-267-PEM	39.84448°	-83.16680°	Yes	PEM	±0.08	25	1	TBD	TBD

4.4 DATA POINT SUMMARY

Following is a description of the information collected at each DP during the 21 November 2022 field investigation. Information that was collected at each DP is summarized on the forms provided in **Appendix C**. DP placement is shown in **Figure 4**.

DP-266

This DP was collected east of Structure 266. This area did not meet all wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of Japanese bristlegrass (FACU, 80%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

4.5 DRAINAGE FEATURES, STREAMS, AND OTHER POTENTIAL “WATERS OF THE U.S.”

No streams or other potential “Waters of the U.S.” were observed during this investigation using the methods described in Chapter 2. An overall SITE delineation map is included as **Figure 4**.



CHAPTER 5 CONCLUSIONS

On 21 November 2022, V3 performed an ecological survey and report for the SITE situated in Franklin County, Ohio.

Five wetlands, WL-275A-PSS, WL-275B-PSS, WL-275C-PSS, WL-275D-PEM, and WL-267-PEM were identified within the SITE area. All five wetlands appeared to lack a hydrologic connection with any federally jurisdictional “Waters of the U.S.” and would likely be considered isolated and subject to regulation by the OEPA alone.

No streams or other potential “Waters of the U.S.” were identified within the SITE area.

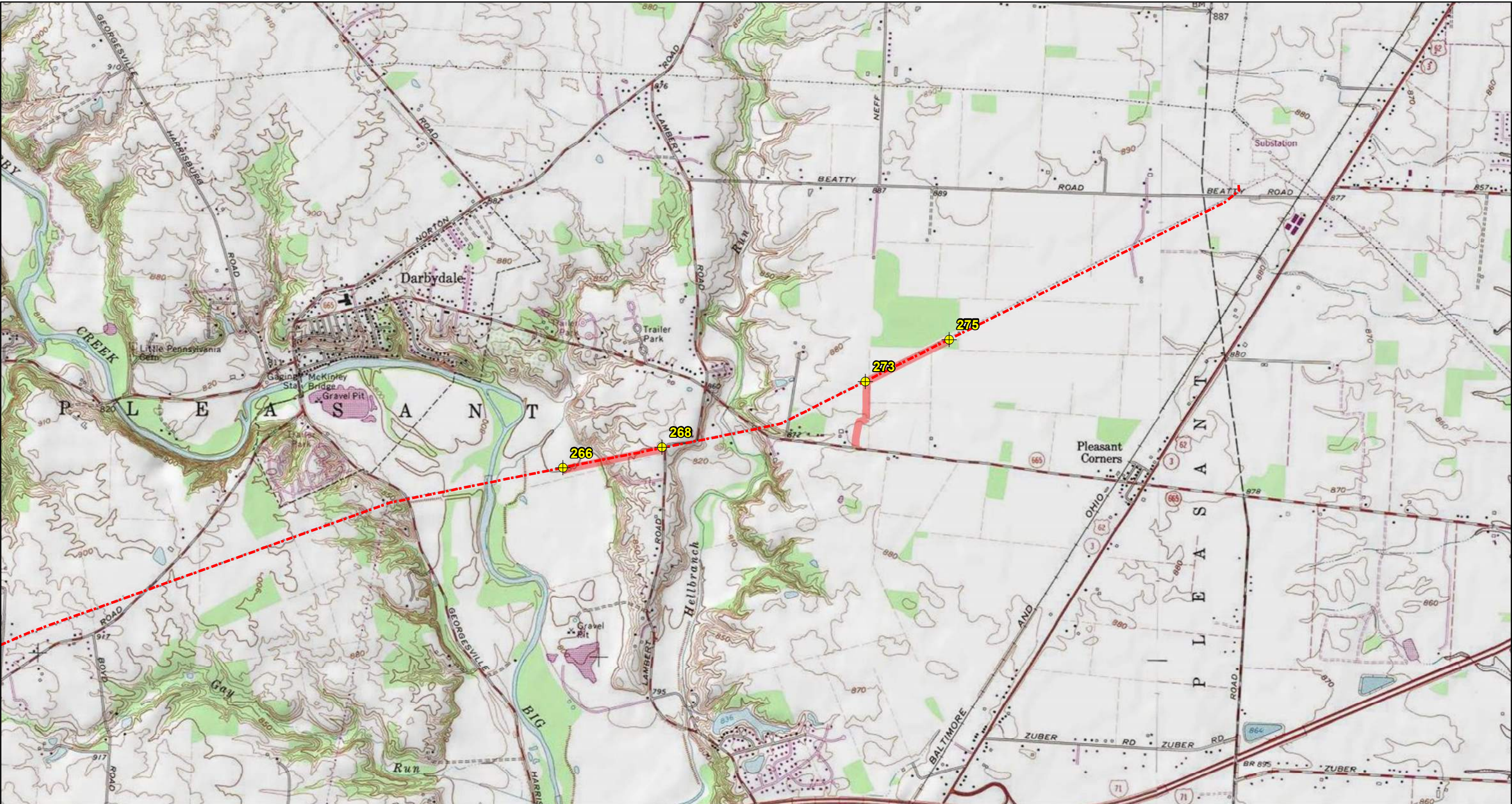
An official species list obtained from the USFWS IPaC website indicated that the SITE is within the ranges of the federally endangered Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), clubshell (*Pleurobema clava*), northern riffleshell (*Epioblasma torulosa rangiana*), rayed bean (*Villosa fabalis*), and snuffbox mussel (*Epioblasma triquetra*), the proposed endangered tricolored bat (*Perimyotis subflavus*), the federally threatened rabbitsfoot (*Quadrula cylindrica cylindrica*), and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. V3 did not observe potential roost trees on-SITE at the time of the SITE reconnaissance. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside the recommended seasonal clearing dates. The USFWS stated the due to the project, type, size, and location, the agency does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.

A review of the Ohio Natural Heritage Database with the Ohio Department of Natural Resources (ODNR) indicates records of the four federally endangered species, one state endangered species, and three state species of concern within one mile of the specified project area. Additionally, the ODNR Division of Fish and Wildlife stated that the project is within range of 26 threatened or endangered species. The ODNR stated that the project is not likely to impact these species and provided recommendations to avoid and minimize impact to these species and their habitats.

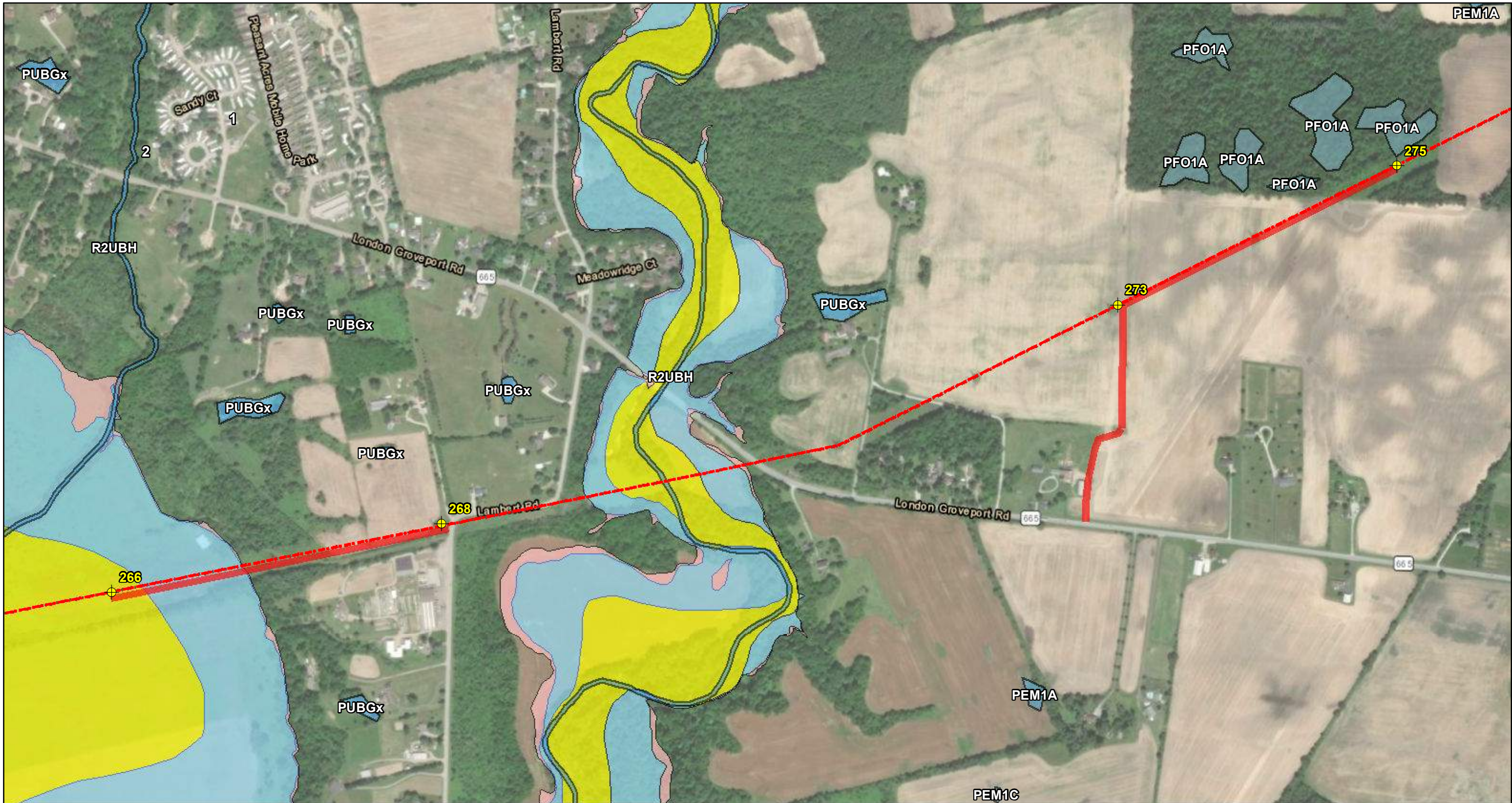


FIGURES

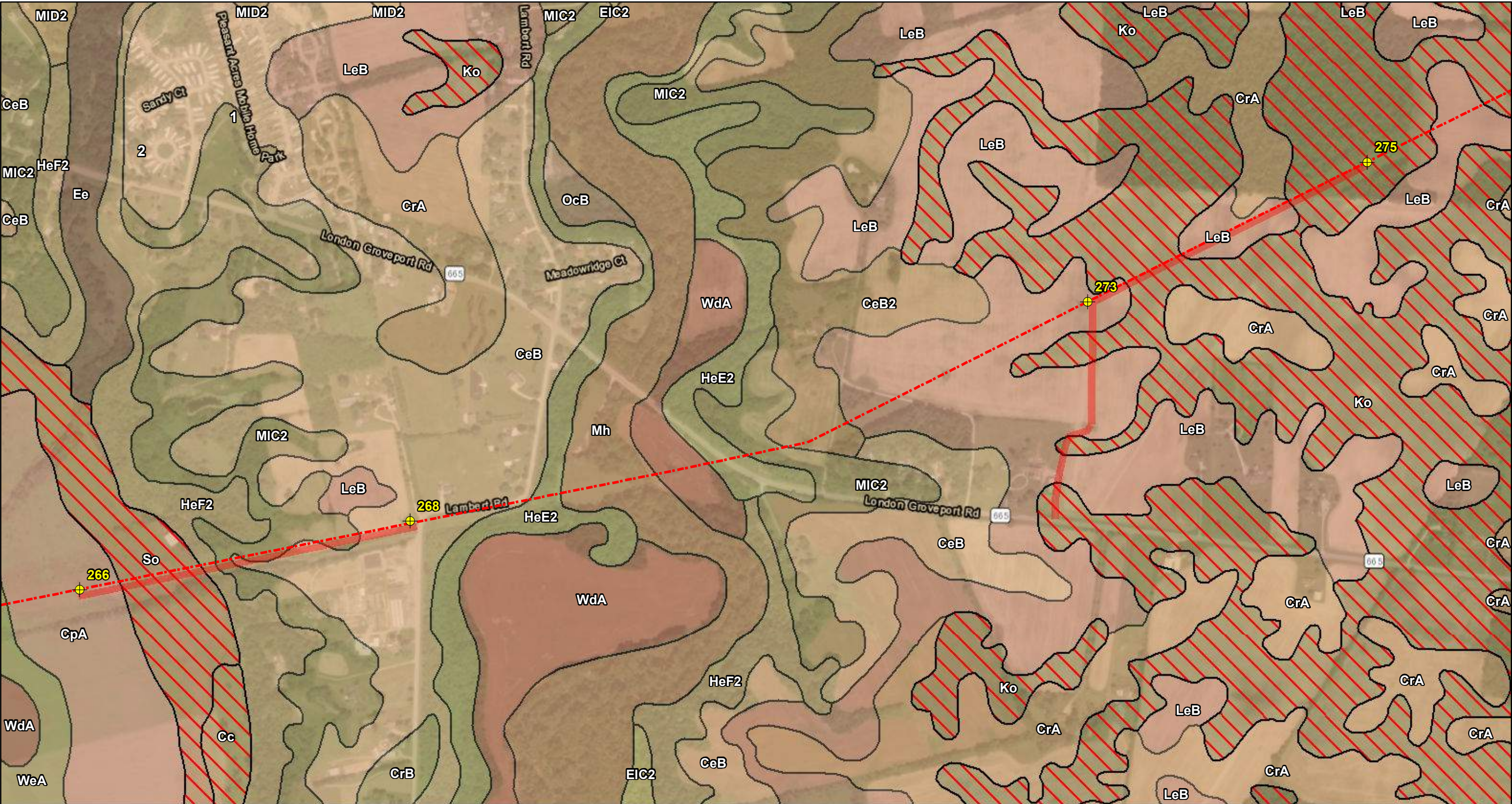




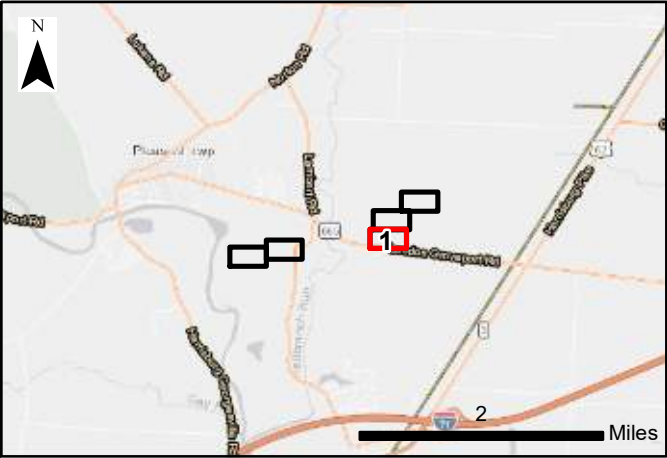
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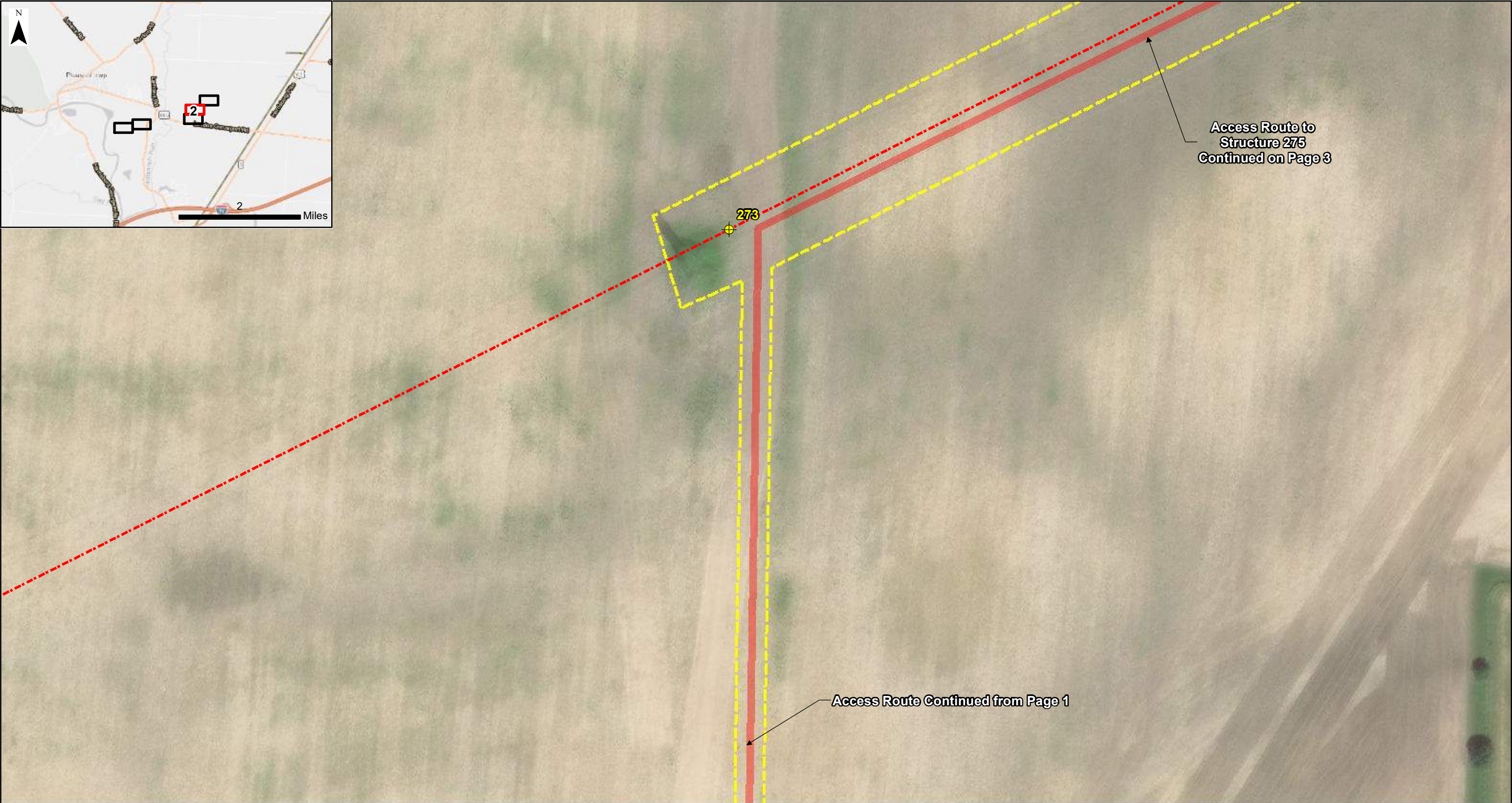
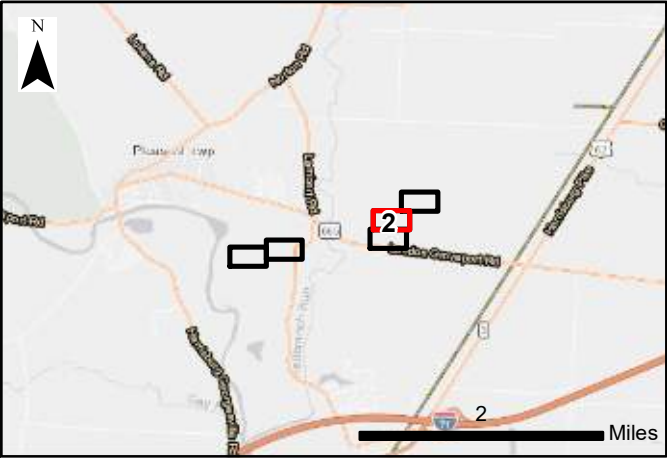
AMERICAN ELECTRIC POWER BOUNDLESS ENERGY 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.: 210180.101	LEGEND: Project Structure Transmission Line Access Route Provided by AEP Zone AE Zone AE, Floodway Zone X, 0.2% Annual Chance Flood Hazard Zone X	TITLE: FLOOD ZONES OF FRANKLIN COUNTY, OHIO AND NATIONAL WETLANDS INVENTORY MAP		0 300 600 Feet
	CREATED BY: CJL				
	DATE: 01/31/2023		SITE: Greene-Beatty 345kV Transmission Line Structure Replacement Franklin County, Ohio		SCALE: 1:7,200
	BASE LAYER: Aerial Imagery (2022)				FIGURE: 2



 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.: 210180.101	LEGEND:  Project Structure  Transmission Line  Access Route Provided by AEP  Hydric Soils of Ohio	TITLE: SOIL SURVEY OF FRANKLIN COUNTY, OH (2019) MAP	 0 300 600 Feet
	CREATED BY: CJL		SITE: Greene-Beatty 345kV Transmission Line Structure Replacement Franklin County, Ohio	
 619 N. Pennsylvania Street Indianapolis, IN 46204 www.v3co.com	DATE: 01/31/2022			
	BASE LAYER: Aerial Imagery (2021)			FIGURE: 3



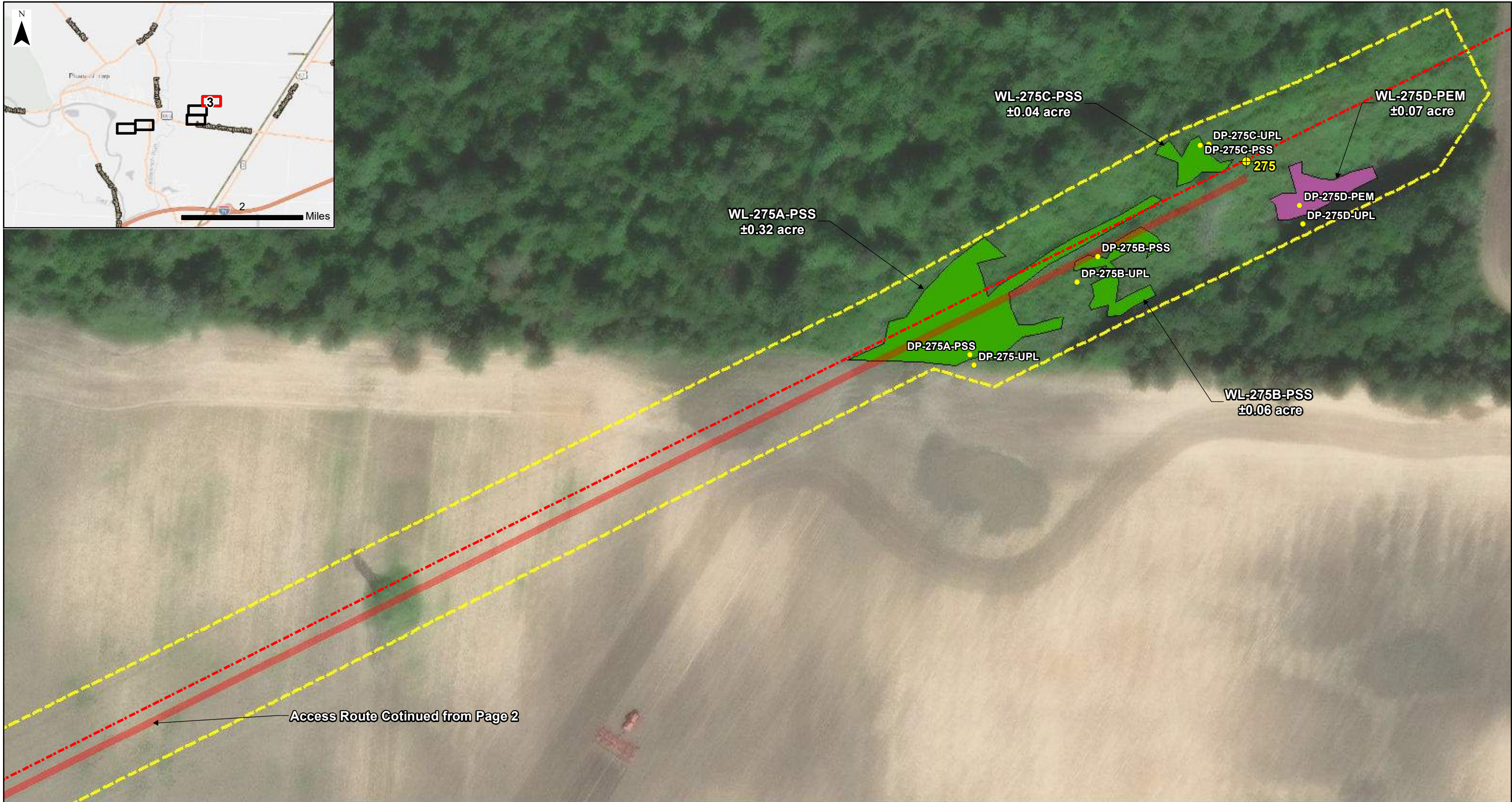
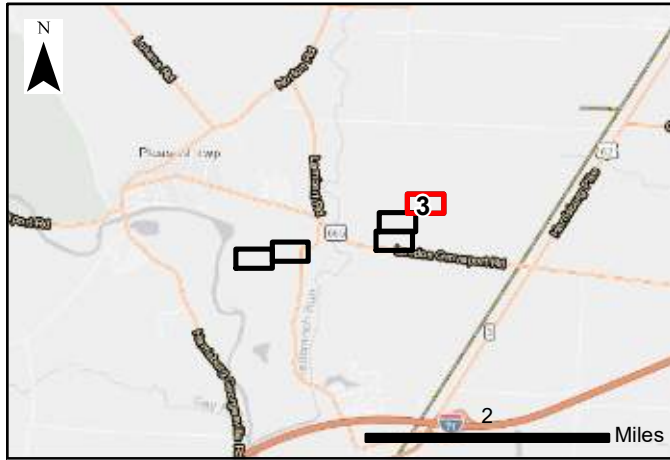
AMERICAN ELECTRIC POWER BOUNDLESS ENERGY 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.:	210180.101	LEGEND: ◆ Project Structure ◆ Existing Utility ● Data Point --- Transmission Line --- Access Route Provided by AEP --- Investigated Area --- Existing Culvert --- Existing Fence --- Swale --- Emergent Wetland --- Scrub/Shrub Wetland	CREATED BY:	MAR	TITLE:	WETLAND DELINEATION MAP	0 50 100 Feet SCALE: 1:1,200 FIGURE: 1 of 5
	DATE:	01/30/2023		SITE:	Greene-Beatty 345kV Transmission Line Structure Replacement Franklin County, Ohio			
	BASE LAYER:	Aerial Imagery (2021)						



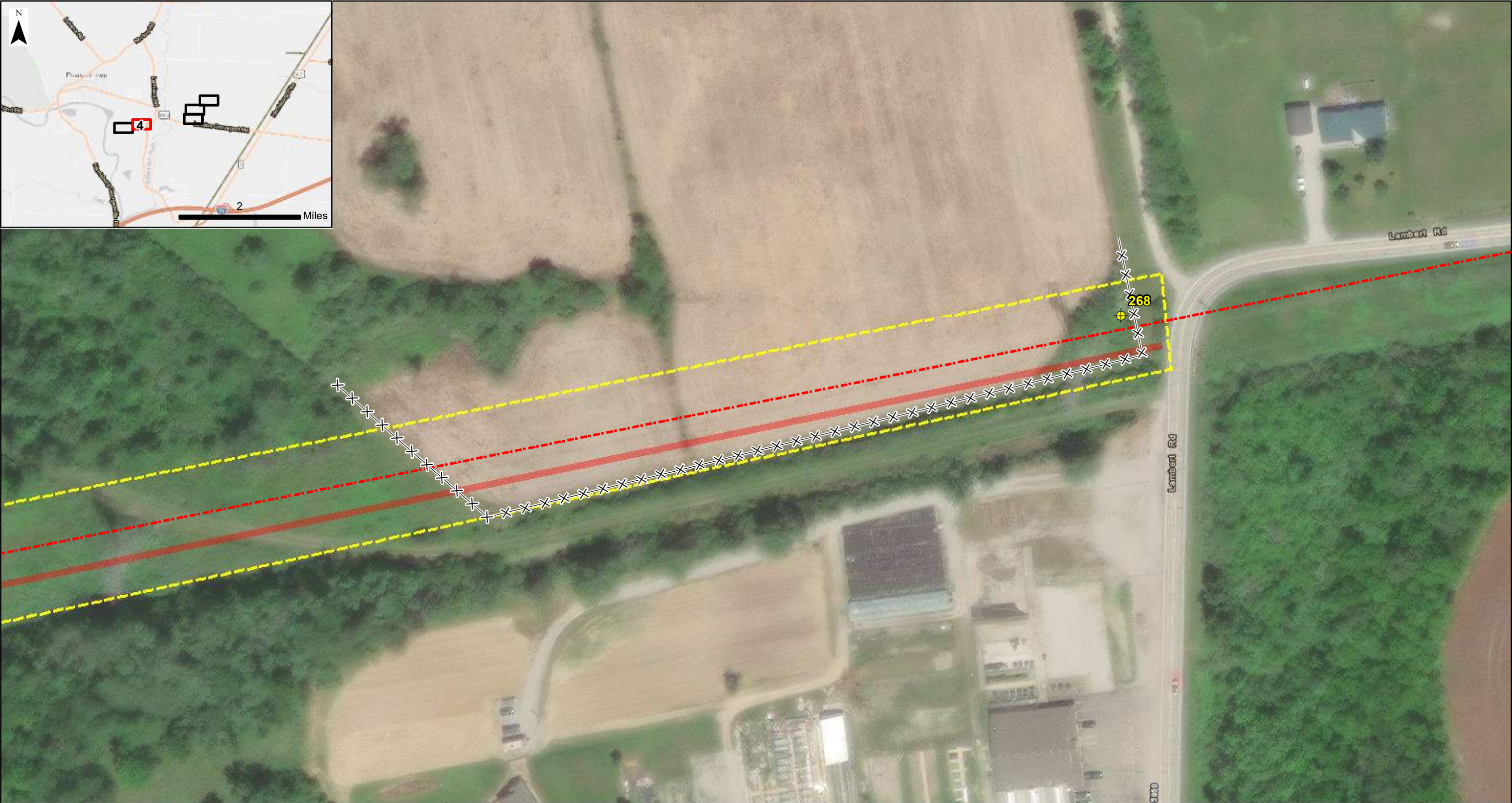
Access Route to
Structure 275
Continued on Page 3

Access Route Continued from Page 1

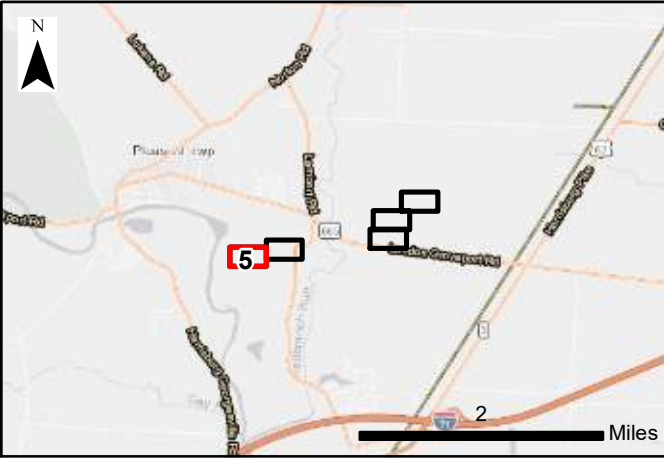
AMERICAN ELECTRIC POWER BOUNDLESS ENERGY 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.: 210180.101	LEGEND: Project Structure Existing Utility Data Point Transmission Line Existing Culvert Ditch Access Route Provided by AEP Existing Fence Swale Investigated Area Emergent Wetland Scrub/Shrub Wetland	TITLE: WETLAND DELINEATION MAP	050100 Feet
	CREATED BY: MAR		SITE: Greene-Beatty 345kV Transmission Line Structure Replacement Franklin County, Ohio	
V3 619 N. Pennsylvania Street Indianapolis, IN 46204 www.v3co.com	DATE: 01/30/2023			FIGURE: 2 of 5
	BASE LAYER: Aerial Imagery (2021)			



 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.: 210180.101	LEGEND:  Project Structure  Transmission Line  Access Route Provided by AEP  Investigated Area  Existing Utility  Existing Culvert  Existing Fence  Data Point  Ditch  Swale  Emergent Wetland  Scrub/Shrub Wetland	TITLE: WETLAND DELINEATION MAP		 0 50 100 Feet	
	CREATED BY: MAR		SITE: Greene-Beatty 345kV Transmission Line Structure Replacement Franklin County, Ohio			
	DATE: 01/30/2023		SCALE: 1:1,200			
 619 N. Pennsylvania Street Indianapolis, IN 46204 www.v3co.com	BASE LAYER: Aerial Imagery (2021)	FIGURE: 3 of 5				



AMERICAN ELECTRIC POWER BOUNDLESS ENERGY 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.:	LEGEND: Project Structure Existing Utility Data Point Transmission Line Existing Culvert Ditch Access Route Provided by AEP Existing Fence Swale Investigated Area Emergent Wetland Scrub/Shrub Wetland						TITLE:	WETLAND DELINEATION MAP 050100 Feet	
	CREATED BY:							MAR		SITE:
V3 619 N. Pennsylvania Street Indianapolis, IN 46204 www.v3co.com	DATE:	01/30/2023						SCALE:	1:1,200	
	BASE LAYER:	Aerial Imagery (2021)						FIGURE:	4 of 5	



AMERICAN ELECTRIC POWER BOUNDLESS ENERGY 8600 Smiths Mill Road New Albany, Ohio 43054 www.aep.com	PROJECT NO.: 210180.101	LEGEND: ⊕ Project Structure — · — · — Transmission Line — Access Route Provided by AEP ⌞ ⌟ Investigated Area ◇ Existing Utility — Existing Culvert × — × Existing Fence ● Data Point — Ditch — · — · — Swale ■ Emergent Wetland ■ Scrub/Shrub Wetland	TITLE: WETLAND DELINEATION MAP	▲ 050100Feet SCALE: 1:1,200 FIGURE: 5 of 5
	CREATED BY: MAR		SITE: Greene-Beatty 345kV Transmission Line Structure Replacement Franklin County, Ohio	
	DATE: 01/30/2023			
V 3 619 N. Pennsylvania Street Indianapolis, IN 46204 www.v3co.com	BASE LAYER: Aerial Imagery (2021)			

APPENDIX A

ETR SPECIES CORRESPONDENCE





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:

December 22, 2022

Project Code: 2023-0028029

Project Name: Greene - Beatty 345kV

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 ECOS-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 ECOS-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:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.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/birds/policies-and-regulations.php>.

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/birds/bird-enthusiasts/threats-to-birds.php>.

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/birds/policies-and-regulations/executive-orders/e0-13186.php>.

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: 2023-0028029

Project Name: Greene - Beatty 345kV

Project Type: Transmission Line - Maintenance/Modification - Above Ground

Project Description: Transmission Line Structure Replacement

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.847788550000004,-83.1504756390131,14z>



Counties: Franklin County, Ohio

Endangered Species Act Species

There is a total of 9 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
Northern Riffleshell <i>Epioblasma rangiana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/527	Endangered
Rabbitsfoot <i>Quadrula cylindrica cylindrica</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/5165	Threatened
Rayed Bean <i>Villosa fabalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5862	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
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

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

IPaC User Contact Information

Agency: V3 Companies

Name: Michael Raun

Address: 619 N. Pennsylvania Street

City: Indianapolis

State: IN

Zip: 46204

Email: mraun@v3co.com

Phone: 3179185041

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



February 8, 2023

Re: Breene – Beatty 345kV

Project Code: 2023-0028029

Dear Ms. Speckman:

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

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

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

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

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

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

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

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

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

Sincerely,



Patrice Ashfield
Field Office Supervisor

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



Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief

2045 Morse Road – Bldg. E-2

Columbus, OH 43229

Phone: (614) 265-6621

Fax: (614) 267-4764

February 17, 2023

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Federally Endangered

clubshell (*Pleurobema clava*)

rayed bean (*Villosa fabalis*)

northern riffleshell (*Epioblasma torulosa rangiana*)

snuffbox (*Epioblasma triquetra*)

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

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

elephant-ear (*Elliptio crassidens crassidens*)

pocketbook (*Lampsilis ovata*)

long solid (*Fusconaia maculata maculate*)

washboard (*Megaloniaias nervosa*)

Ohio pigtoe (*Pleurobema cordatum*)

State Threatened

pondhorn (*Uniomerus tetralasmus*)

Salamander Mussel (*Simpsonaias ambigua*)

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

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

State Endangered

goldeye (*Hiodon alosoides*)

shortnose gar (*Lepisosteus platostomus*)

Iowa darter (*Etheostoma exile*)

spotted darter (*Etheostoma maculatum*)

northern brook lamprey (*Ichthyomyzon fossor*)

tonguetied minnow (*Exoglossum laurae*)

popeye shiner (*Notropis ariommus*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)

paddlefish (*Polyodon spathula*)

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

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

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

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

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

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

Mike Pettegrew
Environmental Services Administrator

APPENDIX B

SITE PHOTOGRAPHS



Photo: 22

Wetland
WL-267-PEM

Direction of View:

East

Date:

21 November 2022



Photo: 23

Wetland
WL-267-PEM

Direction of View:

South

Date:

21 November 2022



Photo: 24

Wetland
WL-267-PEM

Direction of View:

West

Date:

21 November 2022



Photo: 25

DP-267-UPL

Direction of View:

East

Date:

21 November 2022



Photo: 26

Data Point

DP 266

Direction of View:

East

Date:

21 November 2022





9 March 2026

Mr. Jonathon Rose
AEP Ohio Transmission Company, Inc.
8600 Smiths Mill Road
New Albany, Ohio 43054

RE: Greene Beatty 345kV | Ecological Report Addendum

Dear Mr. Rose,

V3 Companies, Ltd. (V3), has prepared an addendum for the Greene Beatty 345kV Transmission Line ecological report. The project begins approximately 0.26 miles north of London Groveport Road and extends 1.26 miles west along Lambert Road (Structures 273, 268, and 266) in Grove City, Franklin County, Ohio.

The initial ecological survey was conducted on 21 November 2022 and included the 0.82-mile-long transmission line and a 100-foot right-of-way corridor. Based on access road changes, V3 conducted an additional site visit on 4 November 2025 to review alternate access to Structures 268 and 266, west of Lambert Road.

This report has been prepared as an addendum to the ecological report for the project.

Limitation of Liability

This report has been prepared solely in accordance with an agreement between American Electric Power ("CLIENT") and V3 Companies, Ltd (V3).

The services performed by V3 have been conducted in a manner consistent with the level of quality and skill generally exercised by members of its profession and consulting practices relating to this type of engagement.

This report is solely for the use of CLIENT, and was prepared based upon an understanding of CLIENT's specific objective(s), and based upon information obtained by V3 in furtherance of CLIENT's specific objective(s). Any reliance of this report by third parties shall be at such third party's sole risk as this report may not contain, or be based upon, sufficient information for purposes of other parties, for their objectives, or for other uses. This report shall only be presented in full and may not be used to support any other objectives than those for CLIENT as set out in the report, except where written approval and consent are expressly provided by CLIENT and V3.

Definitions

A "Water of the U.S." can be described as any waterway that appears to have a "clear, natural line impressed on the bank"¹ that is caused by variations in water levels over a period. The USACE is the final authority on the determination of whether a waterway qualifies for jurisdiction under the Clean Water Act, but can include intermittent streams and drainage ditches, as well as large rivers. Several indicators that may be considered in determining an ordinary high-water mark include, but are not limited to, changes in soil character, destruction of terrestrial vegetation, historical or recorded data, presence of litter and/or debris, scour, and water staining.

¹ U.S. Army Corps of Engineers, *Regulatory Guidance Letter*, No. 05-05, date 7-12-05

Wetlands are defined in the 1987 Manual as, “Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.”² The 1987 Manual outlines the protocol for distinguishing wetland areas from "upland" areas. Wetland areas are delineated according to three primary criteria: vegetation, soil, and hydrology. An area is determined to qualify as a wetland if it meets the following “general diagnostic environmental characteristics:”

- Hydrophytic vegetation
- Hydrology
- Hydric Soil

Field Reconnaissance Summary

V3 staff scientists conducted a SITE investigation on 4 November 2025 to identify areas that met the definition of a wetland or a “Water of the U.S.” An area qualified as a wetland when the dominant hydrophytic vegetation, hydric soils, and hydrology criteria were all met.

Natural Resource Features

No wetland areas were identified within the inspection limits. No other drainage features, streams, or other potential “Waters of the U.S.” were observed.

Below is a description of the information collected at each additional DP during the 4 November 2025 field investigation that was not associated with an identified wetland area. The purpose of collecting these DPs was to describe the remaining characteristics of the SITE. Information that was collected at each DP is summarized on the enclosed forms. Their placement is depicted in the enclosed figure.

DP 268

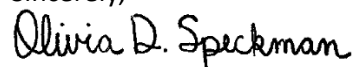
This DP was collected along the proposed new access route northeast of Structure 268. This area did not meet any wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of sugar maple (*Acer saccharum*, FACU, 10%), Johnson grass (*Sorghum halepense*, FACU, 60%) and ground ivy (*Glechoma hederacea*, FACU, 40%). Soil samples were not collected because the sampling location was in a residential landowner’s yard. No indicators of wetland hydrology were observed.

Conclusions

V3 staff scientists identified no streams, wetlands, or other potential “Waters of the U.S.” were observed during the 4 November 2025 investigation.

V3 appreciates the opportunity to be of service to American Electric Power and looks forward to working together in the future. If you have any questions or comments concerning the Ecological Report Addendum, please contact us at your earliest convenience.

Sincerely,



Olivia D. Speckman

² U.S. Army Corps of Engineers Wetlands Delineation Manual, (1987 Manual).

Senior Project Scientist
V3 Companies

Enclosures:
Site Photographs
Data Forms
Delineation Map

Project Name: Greene Beatty 345kV

Site Photographs

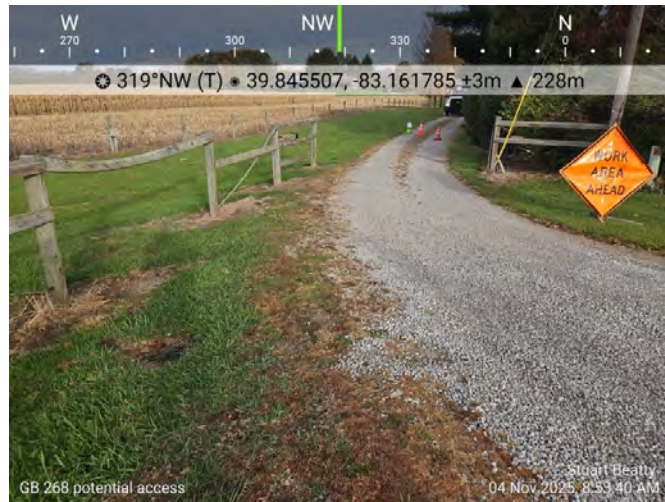


Photo 1

Potential Access



Photo 2

DP 268

Upland



Photo 3

DP 268

Upland



Photo 4

Site Photograph



Photo 5

Site Photograph

WETLAND DETERMINATION FORM-MIDWEST REGION

Site: Greene Beatty 345kV City/County: Grove City/ Franklin Date: 11/4/25 Data Point: DP 268
 Client: AEP State: OH Section, Township, Range: N/A
 Investigator(s): T. Dickson Landform Till Plains Local Relief Concave
 Slope (%): 0-2 Lat. 39.846558 Long. -83.162211 Datum NAD 83 NWI Class: PEM
 Soil Map Unit Name: Celina silt loam
 Climatic/hydrologic conditions typical for time of year? Y/N Y
 Vegetation N, Soil N or Hydrology N significantly disturbed
 Vegetation N, Soil N or Hydrology N naturally problematic
 Are Normal Circumstances Present? Yes x No

SUMMARY OF FINDINGS

Hydrophytic Vegetation Present? Yes <u></u> No <u>x</u>	Is the DP within a Wetland? Yes <u></u> No <u>x</u>
Hydric Soil Present? Yes <u></u> No <u>x</u>	
Wetland Hydrology Present? Yes <u></u> No <u>x</u>	
Remarks:	

VEGETATION

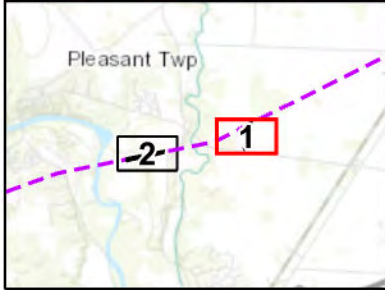
Tree Stratum	Plot size: 30'	Absolute % Cover	Dominant Species	Indicator Status	Dominance Test Worksheet Number of dominant species that are OBL, FACW, or FAC: <u>0</u> Total number of dominant species across all strata: <u>3</u> Percent of dominant species that are OBL, FACW, or FAC: <u>0.00</u> Prevalence Index Worksheet Total % cover of: OBL species <u>0</u> x <u>1</u> = <u>0</u> FACW species <u>0</u> x <u>2</u> = <u>0</u> FAC species <u>0</u> x <u>3</u> = <u>0</u> FACU species <u>110</u> x <u>4</u> = <u>440</u> UPL species <u>0</u> x <u>5</u> = <u>0</u> Total <u>110</u> Prevalence Index: <u>4.00</u>
1. <u>Acer saccharum</u>		10	Y	FACU 4	
2. <u></u>					
3. <u></u>					
4. <u></u>					
Total Cover <u>10</u>					
Shrub Stratum	Plot size: 15'				
1. <u></u>					
2. <u></u>					
3. <u></u>					
4. <u></u>					
5. <u></u>					
Total Cover <u>0</u>					
Herb Stratum	Plot size: 5'				
1. <u>Sorghum halepense</u>		60	Y	FACU 4	
2. <u>Glechoma hederacea</u>		40	Y	FACU 4	
3. <u></u>					
4. <u></u>					
5. <u></u>					
6. <u></u>					
7. <u></u>					
8. <u></u>					
Total Cover <u>100</u>					
Woody Vine Stratum	Plot size: 5'				
1. <u></u>					
2. <u></u>					
Total Cover <u>0</u>					
Remarks:					Hydrophytic Vegetation Indicators: Rapid Test for Hydrophytic Veg. <u></u> Dominance Test is >50% <u></u> Prevalence Index is ≤3.0* <u></u> Morphological Adaptations* <u></u> Problematic Hydrophytic Vegetation* <u></u> *Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic Hydrophytic Vegetation Present? Yes <u></u> No <u>x</u>

SOIL

Profile Description: (Describe to depth needed to document the indicator or confirm absence of indicators.)									
Depth (inches)	Color	Matrix	Color	%	Type*	Loc**	Redox Features	Texture	Remarks
*Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Coated Sand grains **Location: PL=Pore Lining, M=Matrix									
Hydric Soil Indicators:									
<u></u> Histosol (A1)	<u></u> Sandy Mucky Mineral (S1)				<u></u> Redox Dark Surface (F6)				
<u></u> Histic Epipedon (A2)	<u></u> 5cm Mucky Peat or Peat				<u></u> Depleted Dark Surface (F7)				
<u></u> Black Histic (A3)	<u></u> Sandy Gleyed Matrix (S4)				<u></u> Redox Depressions (F8)				
<u></u> Hydrogen Sulfide (A4)	<u></u> Sandy Redox (S5)				Indicators for Problematic Hydric Soils				
<u></u> Stratified Layers (A5)	<u></u> Stripped Matrix (S6)				<u></u> Coast Prairie Redox (A16)				
<u></u> 2 cm Muck (A10)	<u></u> Loamy Mucky Mineral (F1)				<u></u> Iron-Manganese Masses (F12)				
<u></u> Depleted Below Dark Surface (A11)	<u></u> Loamy Gleyed Matrix (F2)				<u></u> Very Shallow Dark Surface (F12)				
<u></u> Thick Dark Surface (A12)	<u></u> Depleted Matrix (F3)				<u></u> Other				
Restrictive Layer (if observed): Type: <u></u>						Hydric Soil Present? Yes <u></u> No <u>x</u>			
Depth (Inches): <u></u>									
Remarks: <u>Soils not collected due to concerns about underground utilities in residential yard</u>									

HYDROLOGY

Wetland Hydrology Indicators:				
Primary Indicators (check all that apply)			Secondary Indicators	
<u></u> Surface Water (A1)	<u></u> Water Stained Leaves (B9)	<u></u> Surface Soil Cracks (B6)		
<u></u> High Water Table (A2)	<u></u> Aquatic Fauna (B13)	<u></u> Drainage Patterns (B10)		
<u></u> Saturation (A3)	<u></u> True Aquatic Plants (B14)	<u></u> Dry-Season Water Table (C2)		
<u></u> Water Marks (B1)	<u></u> Hydrogen Sulfide Odor (C1)	<u></u> Crayfish Burrows (C8)		
<u></u> Sediment Deposits (B2)	<u></u> Oxidized Rhizospheres on Living Roots	<u></u> Saturation Visible on Aerial Imagery (C9)		
<u></u> Drift Deposits (B3)	<u></u> Presence of Reduced Iron (C4)	<u></u> Stunted or Stressed Plants (D1)		
<u></u> Algal Mat or Crust (B4)	<u></u> Recent Iron Reduction in Tilled Soil (C6)	<u></u> Geomorphic Position (D2)		
<u></u> Iron Deposits (B5)	<u></u> Thin Muck Surface (C7)	<u></u> FAC-Neutral Test (D5)		
<u></u> Inundation Visible on Aerial Imagery (B7)	<u></u> Gauge or Well Data (D9)			
<u></u> Sparsely Vegetated Concave Surface	<u></u> Other			
Field Observations: Surface Water Present? Yes <u></u> No <u>x</u> Depth (inches) <u></u>			Hydrology Indicators Present? Yes <u></u> No <u>x</u>	
Water Table Present? Yes <u></u> No <u>x</u> Depth (inches) <u></u>				
Saturation Present? Yes <u></u> No <u>x</u> Depth (inches) <u></u>				
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:				



- | | | |
|---------------------|--------------------|--------------------------------|
| ● Existing Culvert | ◆ Existing Utility | --- Existing Transmission Line |
| ■ Project Structure | — Ditch | --- Environmental Study Area |

0 50 100 200 Feet

FIGURE 1
DELINEATION MAP
SHEET 1 OF 2



GREENE - BEATTY 345 kV
AMERICAN ELECTRIC POWER



AMERICAN
ELECTRIC
POWER

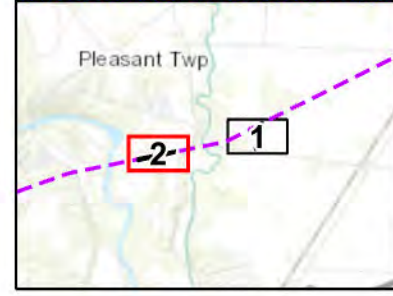
DRAWN BY: TFD	DATE: 3/9/2026
CHECKED: ODS	APPROVED: JVR

3/9/2026

Access Road Labeling
Constructed Width → V-14'-T
Existing Material → V-14'-T
← Installed Material

T= Timber Mat
G= Gravel
D= Dirt
V= Vegetation

REFERENCE: AERIAL IMAGERY, OHIO STATE IMAGERY PROGRAM (OSIP),
2019, 2-FT CONTOURS DEVELOPED USING DEMs DOWNLOADED FROM
OSIP (OHIO STATEWIDE IMAGERY PROGRAM), 2006-2010, NATIONAL
FLOOD HAZARD LAYER, FEDERAL EMERGENCY MANAGEMENT AGENCY
(FEMA), OHIO, 2022.



● Data Point ● Potential Obstacle ● Existing Structure ● Existing Culvert ▲ Existing Gate	■ Project Structure — Swale ×—× Existing Fence — Existing Transmission Line — Additional Study Area	LEGEND — Environmental Study Area ▨ FEMA Floodways (20%T) ▨ FEMA 100-Year Floodplains (0%T)
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0 50 100 200 Feet

**FIGURE 1
DELINEATION MAP
SHEET 2 OF 2**

GREENE - BEATTY 345 kV
AMERICAN ELECTRIC POWER

DRAWN BY: TFD
CHECKED: ODS

DATE: 3/9/2026
APPROVED: JVR

3/9/2026

REFERENCE: AERIAL IMAGERY, OHIO STATE IMAGERY PROGRAM (OSIP), 2019. 2-FT CONTOURS DEVELOPED USING DEMs DOWNLOADED FROM OSIP (OHIO STATEWIDE IMAGERY PROGRAM), 2006-2010. NATIONAL FLOOD HAZARD LAYER, FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), OHIO, 2022.

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