Letter of Notification for the Kiber Station and Kiber 138 kV Extension East and West Transmission Line Project

PUCO Case No. 25-1160-EL-BLN

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

Submitted by:
AEP Ohio Transmission Company, Inc.

December 18, 2025

LETTER OF NOTIFICATION

AEP Ohio Transmission Company, Inc.

Kiber Station and Kiber 138 kV Extension East and West Transmission Line Project

4906-6-05 Accelerated Application Requirements

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

4906-6-05(B) General Information

B(1) Project Description

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

The Company is proposing the Kiber Station and Kiber 138 kV Extension East and West Transmission Line Project (the "Project"), located in Monroe Township, Licking County, Ohio. The Project involves construction of a new 9.7-acre transmission substation and two, approximately 0.1-mile 138 kV transmission lines, to provide electricity to a local electric distribution provider. The Kiber Station portion Project is located on property owned by the Company with the 138 kV transmission lines spanning from an existing transmission line on the adjacent property to the south. The Project will support the local provider's new distribution substation to the northeast. A new double-circuit Kiber-Groves Corner 138 kV transmission line will be constructed to the local distribution provider's substation located approximately 1.2 miles to the east-northeast of Kiber Station and will be filed with OPSB under separate cover (OPSB Case No 25-1161-EL-BLN). The location of the Project is shown on Figure 1 and Figure 2 of **Appendix A**.

The Project meets the requirements for a Letter of Notification (LON) as defined by Items 1(a) and 3 of Appendix A to Ohio Administrative Code Section 4906-1-01, *Application Requirement Matrix for Electric Power Transmission Lines*:

(1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:

(a) Line(s) not greater than 0.2 miles in length.

(3) Construction of a new electric power transmission substation.

The Project has been assigned Case No. 25-1160-EL-BLN.

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.

A customer has requested a new 138 kV delivery to serve their facility requiring 49 MW of initial demand and 103 MW of ultimate peak demand in the New Albany, Ohio area. To meet the customer's need, the Company and its affiliate will construct a new 138 kV Kiber Station, which is the subject of this application. To deliver power to Kiber Station, the Company will tap the Green Chapel Extension 138 kV line (specifically the Green Chapel-Souder 138 kV circuit) and build two approximately 0.1-mile transmission lines, Kiber Extension East and Kiber Extension West, which is also subject of this application. Service to the customer owned station will be provided by an approximately 1.2-mile double circuit 138 kV transmission line from the proposed Kiber Station to the customer's distribution stepdown Groves Corner Station.

Failure to move forward with the proposed Project will result in the inability to serve the customer's projected 103 MW load expectations and thereby jeopardize the customer's plans in the New Albany area.

The need was presented and reviewed with stakeholders at the May 19, 2023, SRRTEP meeting. The solution was presented and reviewed at the October 18, 2024, SRRTEP meeting. PJM has assigned s3590 as the supplemental number for this Project. This Project was included in the Company's 2025 Long Term Forecast Report, and is located on pages 86 and 87 (Table FE-T9) as well as page 109 (Table FE-T10), see **Appendix B**.

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 is located on Company property within an area being redeveloped from agricultural and residential use to commercial and industrial use. Based on the proposed developments and existing facilities in the area, available land suitable for the Project is extremely limited. The proposed location of Kiber Station was set aside by development groups for its proposed purpose and is the most suitable location for the Project. Other alternatives would require impacting additional neighboring properties beyond the areas proposed for redevelopment. The location of the Project minimizes impacts to the

community and the environment, while considering the engineering and construction needs of the customer. The Project also represents the most suitable location and most appropriate solution for meeting the Company's, the local distribution provider's, and their customers' needs.

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 will inform adjacent property owners and tenants about this Project through several different mediums. Within seven days of filing this LON, the Company will issue a public notice in a newspaper of general circulation in the Project area. The notice will comply with all requirements of Ohio Revised Code ("OAC") Section 4906-6-08(A)(1-6). Further, the Company has mailed (or will mail) a letter, via first class mail, to contiguous owners and tenants. The letter will comply with all requirements of OAC Section 4906-6-08(B). The Company maintains a website (http://aeptransmission.com/ohio/) which provides the public access to an electronic copy of this LON and the public notice for this LON. An electronic copy of the LON will be served to the public library in each political subdivision for this Project. The Company retains ROW land agents that discuss Project timelines, construction and restoration activities and convey information to affected owners and tenants throughout the Project.

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 March 2026 with an anticipated in-service date of December 2026.

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 topographic maps of the Johnstown and Jersey, Ohio quadrangles. **Appendix A, Figure 2** displays the Project components on a 2023 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)
052-173490-00.007	Company Property	Not Applicable
052-173490-00.000	Company Property	Not Applicable
052-173490-00.001	Company Property	Not Applicable
052-173490-00.005	Company Property	Not Applicable
052-173490-00.004	Drainage Easement	No
095-111492-00.000	New Easement	No

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 equipment and facilities to be installed for the Project are anticipated to include the following:

Substation

1 – 16x72ft Drop-in Control Module
12 – 138kv Circuit Breakers
1 – 300MVAR Statcom

Transmission Lines

The transmission lines are estimated to include the following:

Kiber Extension East
Voltage: 138kV
Conductors: Double Bundled 1590 KCMIL 54/19 "Falcon" ACSR
Static Wire: (2) 96ct OPGW 0.646" Dia
Insulators: Polymer
ROW Width: 100 feet
Structure Type: One (1) double circuit, steel two-pole dead ends
One (1), double circuit, Steel monopole with Davit Arms

Kiber Extension West
Voltage: 138kV
Conductors: Double Bundled 1590 KCMIL 54/19 "Falcon" ACSR
Static Wire: (2) 96ct OPGW 0.646" Dia
Insulators: Polymer
ROW Width: 100 feet
Structure Type: One (1) double circuit, steel two-pole dead ends
One (1), double circuit, Steel monopole with Davit Arms

Green Chapel Extension
Voltage: 138kV
Conductors: Double Bundled 1590 KCMIL 54/19 "Falcon" ACSR
Static Wire: (2) 96ct OPGW 0.646" Dia
Insulators: Polymer
ROW Width: 100 feet
Structure Type: Two (2) double circuit, steel two-pole dead ends

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 proposed Project, which is comprised of applicable tangible and capital costs, is approximately $127,500,000 based on a Class 4 estimate. Pursuant to the PJM OATT, the costs for this Project will be recovered in the AEP Ohio Transmission Company Inc.'s FERC formula rate (Attachment H-20 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 has recently been converted from residential use in preparation for large-scale conversion to commercial and industrial use in the vicinity. Multiple residences have been removed from the Project area by developers, prior to transfer to the Company. An aerial photograph of the Project

vicinity is provided as **Figure 2**. The Project is mapped within Monroe Township in Licking County. The Project anticipates the need to clear approximately 0.3 acres of trees on the property.

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 proposes redeveloping former residential properties with Kiber Station. The 138 kV transmission line extensions will cross a former agricultural and residential parcel. The Project vicinity is rapidly changing with the development of several industrial facilities and data centers. No agricultural land is within the potential disturbance area of the Project.

Based on data received from the Licking County Auditor's office on December 2, 2025, there are no agricultural district parcels or Ohio Department of Agricultural easements within the potential disturbance area of the Project.

B(10)(c) Archaeological and Cultural Resources

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

A cultural resource survey and report were conducted by the Company's consultant for the western portion of the Kiber Station properties in July 2024. Addendum surveys and reports for the eastern portions of the Kiber Station properties were conducted in September and November 2025. A separate survey and report were conducted for the 138 kV extensions in October 2025. Correspondence from the State Historic Preservation Office ("SHPO") was received in August, October, and December 2025, 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 2**, below. There are no other known local, state, or federal requirements that must be met prior to commencement of the Project.

Table 2 – Anticipated Permits

Permit/Authorization/Coordination	Agency	Date
Storm Water Pollution Prevention Plan	Ohio Environmental Protection Agency Licking County	Expected Spring 2025
Notice Criteria	Federal Aviation Administration	Coordination is expected to be completed in January 2026
Road Use Maintenance Agreement	Licking County	Already in place for other projects by the Company in the area.
Clean Water Act Section 404/401	United States Army Corps of Engineers Ohio Environmental Protection Agency	Anticipated Spring 2025 based on wetland impacts
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete for Kiber Station 10/20/2025, and 138 kV Extensions 12/5/2025, no additional work required.
Threatened and Endangered Species	United States Fish and Wildlife Service	Consultation complete 12/1/2023
Threatened and Endangered Species	Ohio Department of Natural Resources	Consultation complete 1/12/2024
Floodplain	Licking County	Expected Spring 2025

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.

As part of the ecological study completed for the Project, 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. USFWS and ODNR provided responses on December 1, 2023 and January 12, 2024, respectively. Copies of the agencies' responses are presented in **Appendix C**.

Table 6 in **Appendix D** provides the full evaluation of the federal and state threatened or endangered species for the Project area.

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

B(10)(f) Areas of Ecological Concern

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

The Company's consultant conducted a wetland and stream delineation survey in the Project study area on January 26, April 19, July 3, 2024, January 28, and July 28, 2025, and prepared Ecological Survey Reports for the substation property (**Appendix D**) and transmission line extensions (**Appendix E**). The survey of the Project area identified two wetlands, three streams, and six upland drainage features. The Project construction activities are expected to result in discharge of approximately 0.8 acre of fill in one of the wetlands. The Company will obtain the appropriate permits prior to construction within the wetland. Streams will be avoided.

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.

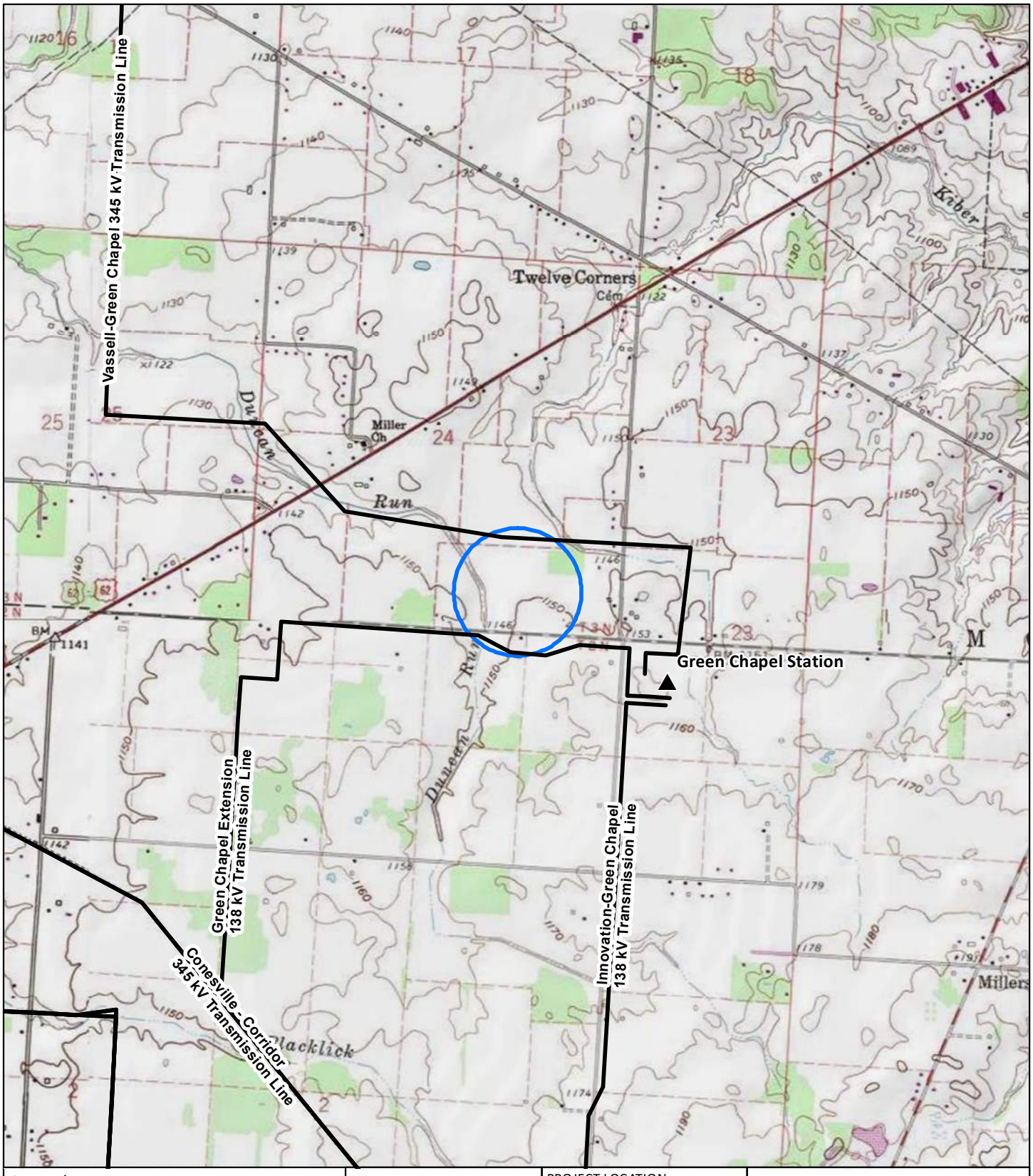
The FEMA Flood Insurance Rate Map ("FIRM") was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map numbers 39089C0140J, 39089C0280J). Based on this mapping, the FEMA-designated 100-year floodplains associated with Duncan Run is mapped across the southwest corner of the Company property. Grading and fill are planned within the floodplain area. Local floodplain permitting will be coordinated with agencies for the jurisdiction as applicable prior to construction.

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



Legend:
- Project Area
- Existing Station
- Existing Transmission Line

Data Sources: AEP, USGS 7.5' Topographic Quadrangles (Johnstown and Jersey, Ohio)

Ohio State Plane South
NAD 1983

December 13, 2025

PROJECT LOCATION

LICKING COUNTY, OHIO

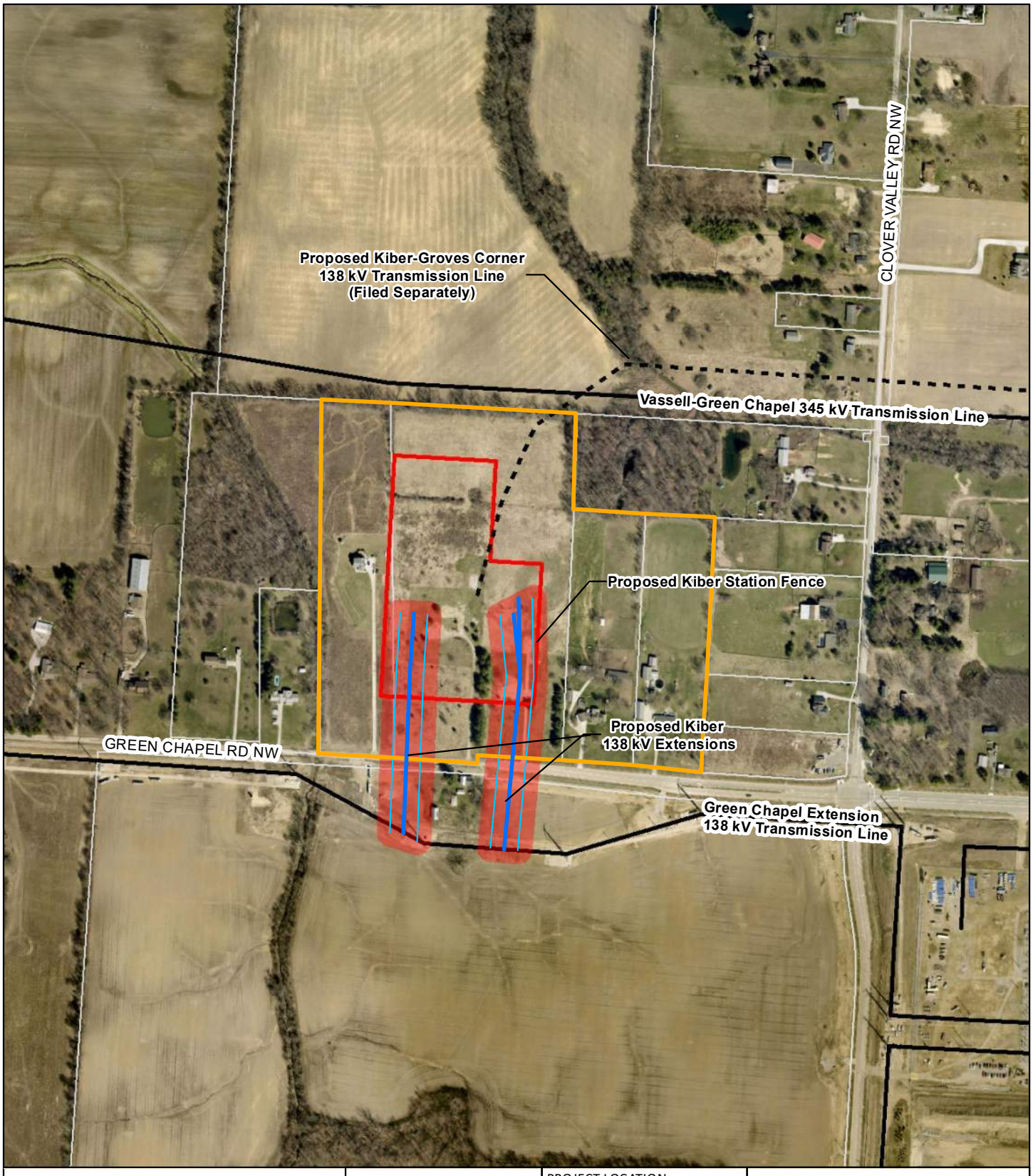
FIGURE 1
TOPOGRAPHIC OVERVIEW

AEP OHIO TRANSMISSION COMPANY

Kiber 138 kV Station and Kiber 138 kV Extension East and West Transmission Line

0 1,000 2,000 3,000

Feet



Proposed Kiber Station
Proposed Transmission
Proposed Right-of-way
Extensions Project Corridor
Kiber Station Property
Proposed Kiber-Groves Corner 138 kV Line (Filed Separately)
Parcel Boundary

Data Sources: AEP, ESRI World Imagery (2025)

Ohio State Plane South NAD 1983

December 13, 2025

PROJECT LOCATION

LICKING COUNTY, OHIO

FIGURE 2
PROJECT AERIAL MAP

AEP OHIO TRANSMISSION COMPANY

Kiber 138 kV Station and Kiber 138 kV Extension East and West Transmission Line

0 250 500 750

Feet

Appendix B PJM Solution and Long Term Forecast Report

AEP Transmission Zone M-3 Process
New Albany, OH

Need Number: AEP-2023-OH070

Process Stage: Solutions Meeting SRRTEP-W - 10/18/2024

Previously Presented: Need Meeting 5/19/2023

Project Driver: Customer Service

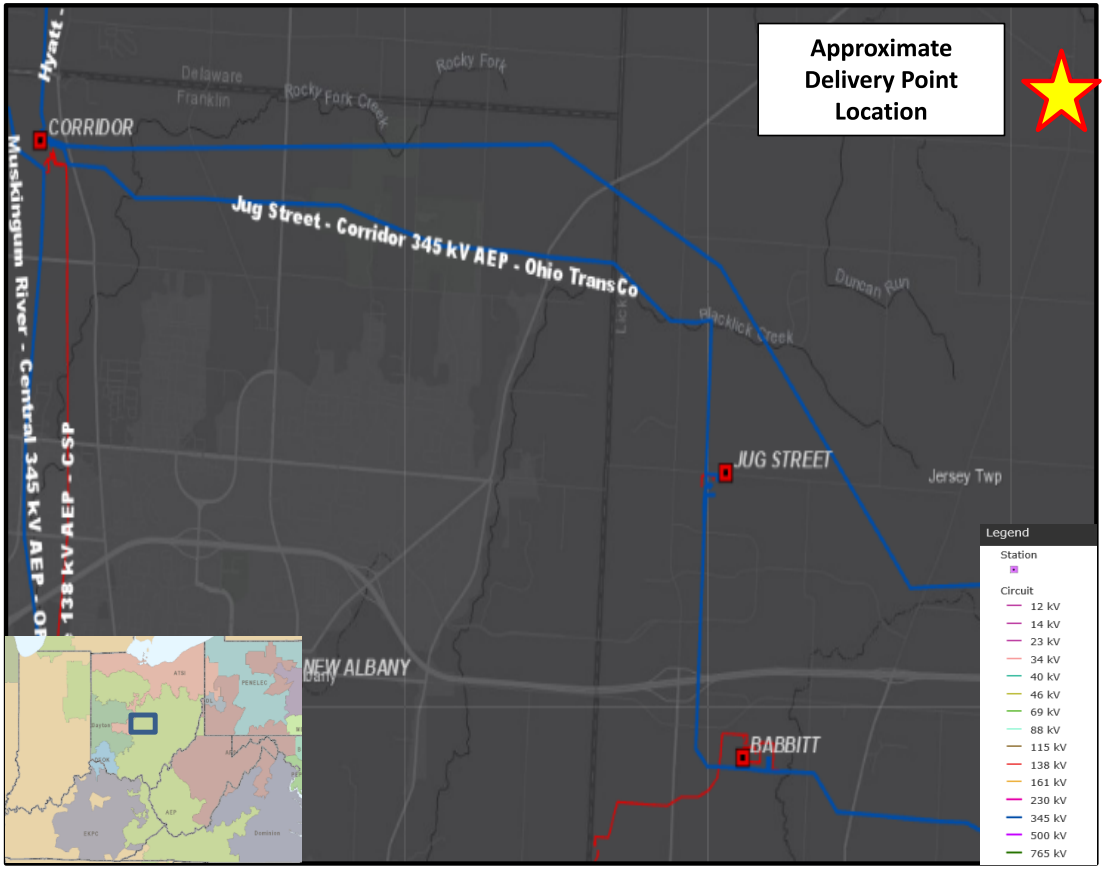
Specific Assumption Reference:

AEP Connection Requirements for the AEP Transmission System (AEP Assumptions Slide 12)

Problem Statement:

Customer Service:

- Buckeye Power, Inc. (Buckeye), on behalf of The Energy Cooperative (Licking REC) has requested a new 138 kV delivery point in New Albany Ohio.
- The projected demand at this delivery point is 24 MW in 2025 with an expected ultimate load of 43 MW by 2033.
- The customer has requested an ISD of June 2025



AEP Transmission Zone M-3 Process
New Albany, OH

Need Number: AEP-2023-OH070

Process Stage: Solutions Meeting SRRTEP-W - 10/18/2024

Proposed Solution:

Kiber Station 138 kV: Install 4 - 90kA 4000A 138 kV circuit breakers at the proposed Kiber station (s3442.17) to accommodate the 138 kV line extensions to LRE's Groves Corner station.. Estimated Cost: $11.5 M

Groves Corner Station (LRE): Install 12 kV customer metering.. Estimated Cost: $0.097 M

Kiber - Groves Corner 138 kV Line: Construct a ~2.0-mile 138kV double circuit transmission line utilizing 2-bundled ACSS 1033.5 MCM Curlew conductor SE rating (561 MVA) between Kiber and Licking REC's greenfield delivery point Groves Corner.. Estimated Cost: $20.691 M

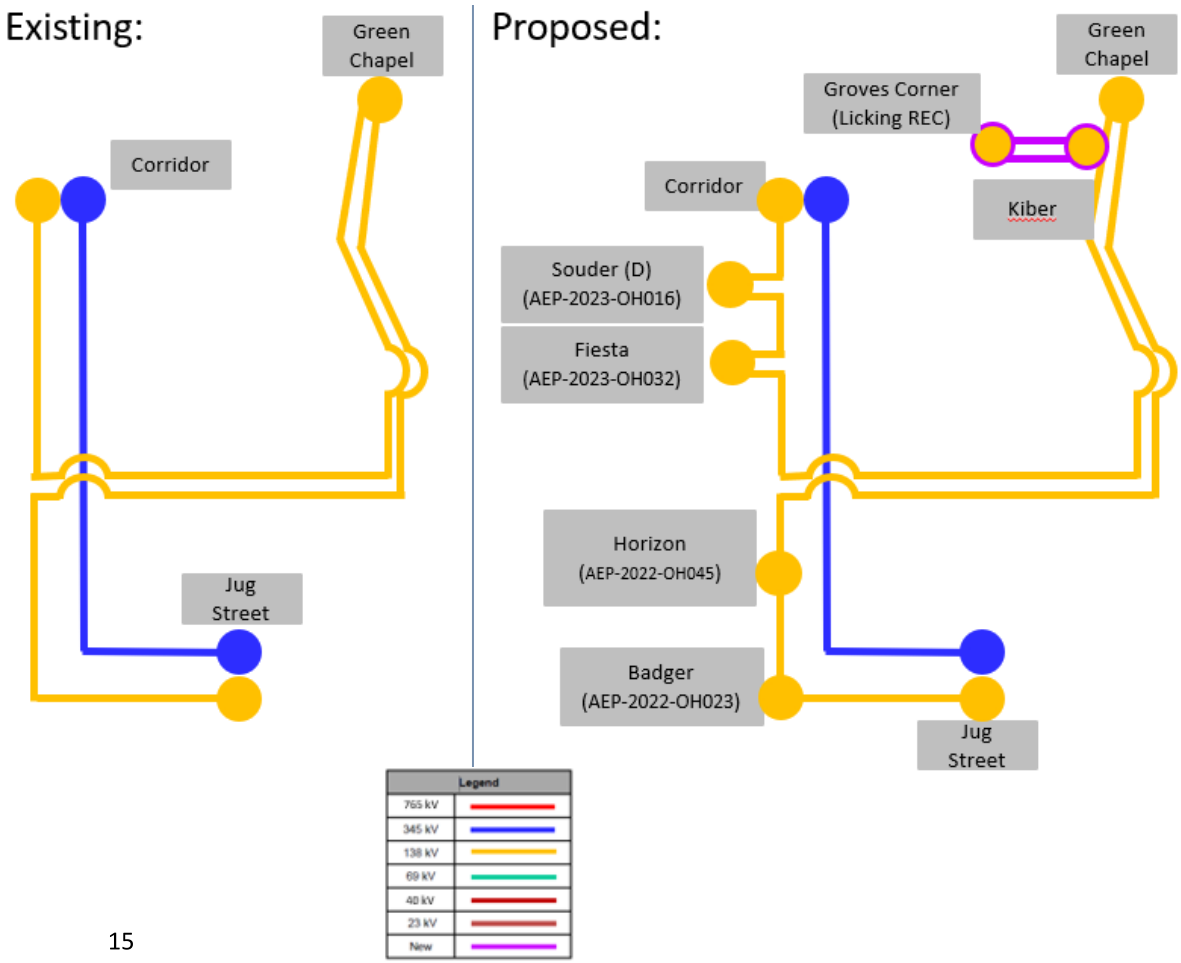
Transmission Cost Estimate: $32.288 M

Alternatives Considered:

Consideration was given to serving the site out of the proposed Green Chapel station (s2857), but lack of physical space available at the station made the alternative infeasible.

Projected In-Service: 01/02/2026

Project Status: Engineering



4	**VOLTAGE: DESIGN / OPERATE**	69 / 34.5 kV
5	**APPLICATION FOR CERTIFICATE:**	N/A
6	**CONSTRUCTION:**	6/11/2026
7	**CAPITAL INVESTMENT:**	$ 4M
8	**PLANNED SUBSTATION:**	N/A
9	**SUPPORTING STRUCTURES:**	Steel
10	**PARTICIPATION WITH OTHER UTILITIES**	N/A
11	**PURPOSE OF THE PLANNED TRANSMISSION LINE**	Rebuild aging infrastructure; improve system reliability
12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Potential for increased transmission line outages
13	**MISCELLANEOUS:**	
1	**LINE NAME AND NUMBER:**	North Portsmouth - Oertels Corner 69 kV (TP2021773 b3362)
2	**POINTS OF ORIGIN AND TERMINATION**	North Portsmouth - Oertels Corner INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	4.75 mi / 60 ft / 1 circuit
4	**VOLTAGE: DESIGN / OPERATE**	69 / 69 kV
5	**APPLICATION FOR CERTIFICATE:**	N/A
6	**CONSTRUCTION:**	2026
7	**CAPITAL INVESTMENT:**	$17.51 M
8	**PLANNED SUBSTATION:**	N/A
9	**SUPPORTING STRUCTURES:**	Steel
10	**PARTICIPATION WITH OTHER UTILITIES**	N/A
11	**PURPOSE OF THE PLANNED TRANSMISSION LINE**	Mitigate overloading & rebuild aging infrastructure; improve system reliability
12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Potential for increased transmission line outages
13	**MISCELLANEOUS:**	
1	**LINE NAME AND**	Kiber Extension East (TP2023060 s3442)
2	**POINTS OF ORIGIN AND**	Kiber - Green Chapel INTERMEDIATE STATION - N/A

3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	0.25 mi / 100 ft / 2 circuit (0.1 mi line work)
4	**VOLTAGE: DESIGN / OPERATE**	138 / 138 kV
5	**APPLICATION FOR CERTIFICATE:**	2025
6	**CONSTRUCTION:**	2025
7	**CAPITAL INVESTMENT:**	$2 M
8	**PLANNED SUBSTATION:**	Kiber
9	**SUPPORTING STRUCTURES:**	Steel
10	**PARTICIPATION WITH OTHER UTILITIES**	N/A
11	**PURPOSE OF THE PLANNED TRANSMISSION LINE**	Service to new customer
12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Unable to serve new customer
13	**MISCELLANEOUS:**	
1	**LINE NAME AND NUMBER:**	Kiber Extension West (TP2023060 s3442)
2	**POINTS OF ORIGIN AND TERMINATION**	Kiber - Fiesta INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	2.5 mi / 100 ft / 2 circuit (0.1 mi line work)
4	**VOLTAGE: DESIGN / OPERATE**	138 / 138 kV
5	**APPLICATION FOR CERTIFICATE:**	2025
6	**CONSTRUCTION:**	2025
7	**CAPITAL INVESTMENT:**	$2 M
8	**PLANNED SUBSTATION:**	Kiber
9	**SUPPORTING STRUCTURES:**	Steel
10	**PARTICIPATION WITH OTHER UTILITIES**	N/A
11	**PURPOSE OF THE PLANNED TRANSMISSION LINE**	Service to new customer
12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Unable to serve new customer

Rocky Ford (AE1-146 TP2020271)	138 kV	T	2023 - 2024	Ebersole - Rocky Ford 138 kV	P	~ 8
Rocky Ford (AE1-146 TP2020271)	138kV	T	2023 - 2024	Fostoria Centeral - Rocky Ford 138 kV	P	~ 8
Rocky Ford (AE1-146 TP2020271)	138kV	T	2023 - 2024	Rocky Ford - Arcadia 138 kV	P	~ 8
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Beatty - Cyprus 345 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Bixby - Cyprus 345 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Cyprus - White Road 138 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Canal Street - Cyprus 138 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Cyprus - Fethers McGraw E 138 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Cyprus - Fethers McGraw F 138 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Cyprus - Chilly Willy C 138 kV	P	Station expansion
Cyprus (s3440 TP2022769)	138 / 345	T	2024	Cyprus - Chilly Willy D 138 kV	P	Station expansion
Innovation (s3442.3 TP2022055)	138 / 345 kV	T	2024	Corridor - Innovation 345 kV	E	Station expansion
Innovation (s3442.3 TP2022055)	138 / 345 kV	T	2024	Conesville - Innovation 345 kV	E	Station expansion
Innovation (s3442.3 TP2022055)	138 / 345 kV	T	2024	Innovation - Mordor 138 kV #1	P	Station expansion
Innovation (s3442.3 TP2022055)	138 / 345 kV	T	2024	Innovation - Mordor 138 kV #2	P	Station expansion
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda - innovation 345 kV	P	~ 6
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda - Corridor 345 kV	P	~ 6
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda - Vassell 345 kV	P	~ 6
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda -Arnor 345 kV #1	P	~ 6
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda -Arnor 345 kV #2	P	~ 6
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda -Arnor 345 kV #3	P	~ 6
Bermuda (s3442.10 TP2023011)	345 kV	T	2025 - 2026	Bermuda -Arnor 345 kV #4	P	~ 6
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Bermuda - Curleys 345 kV #1	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Bermuda - Curleys 345 kV #2	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Corridor - Curleys 345 kV	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Curleys - Vassell 345 kV	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Curleys - Numenor 345 kV #1	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Curleys - Numenor 345 kV #2	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Curleys - Numenor 345 kV #3	P	~ 10
Curleys (s3442.8 TP2022958)	345 kV	T	2029	Curleys - Numenor 345 kV #4	P	~ 10
Kiber (TP2023060)	138 kV	T	2026	Kiber - Groves (LRE) #1 138 kV	P	1
Kiber (TP2023060)	138 kV	T	2026	Kiber - Groves (LRE) #2 138 kV	P	1
Kiber (TP2023060)	138 kV	T	2026	Green Chapel - Kiber 138 kV	P	1
Kiber (TP2023060)	138 kV	T	2026	Fiesta - Kiber 138 kV	P	1
Plumwood (TP2022095 AG1-125)	765 kV	T	2027	Plumwood - Oak Run Solar 765 kV	P	~80
Plumwood (TP2022095 AG1-125)	765 kV	T	2027	Plumwood - Flatlick 765 kV	P	~80
Plumwood (TP2022095 AG1-125)	765 kV	T	2027	Plumwood - Marysville 765 kV	P	~80
Peach (TP2023504)	138 kV	T	2027	Peach - Kirk 138 kV	P	12
Peach (TP2023504)	138 kV	T	2027	Peach - West Hebron 138 kV	P	12
Peach (TP2023504)	138 kV	T	2027	Peach - Georgia #1 138 kV	P	12
Peach (TP2023504)	138 kV	T	2027	Peach - Georgia #2 138 kV	P	12
Peach (TP2023504)	138 kV	T	2027	Peach - Georgia #3 138 kV	P	12
Peach (TP2023504)	138 kV	T	2027	Peach - Georgia #4 138 kV	P	12
Royalton (TP2022021 AF2-371)	138 kV	T	2028	Royalton - Harison 138 kV	P	6
Royalton (TP2022021 AF2-371)	138 kV	T	2028	Royalton - Lemaster138 kV	P	6

Appendix C Agency Correspondence

In reply, refer to
2024-LIC-61771

August 2, 2024

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

RE: Kiber Station Greenfield Project, Monroe Township, Licking County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on July 8, 2024, regarding the proposed Kiber Station Greenfield Project located in Monroe Township, Licking County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board (OPSB) rules for siting this project (OAC 4906-4 & 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Phase I Cultural Resource Management Investigations for the 8.4 ha (20.8 ac) Kiber Station Greenfield Project in Monroe Township, Licking County, Ohio* by Ryan J. Weller and Scott McIntosh (Weller & Associates, Inc. 2024). This project is related to the construction of the proposed Kiber Station located to the north of Green Chapel Road NW. A literature review, visual inspection, and shovel test excavations were completed as part of the investigations. Portions of the project area have been previously investigated for the presence of cultural resources. This survey noted areas of disturbance from the construction of modern residences, driveways, and transportation route activities. There were no previously documented archaeological sites located within the project area and there were no new archaeological sites identified through these investigations. Our office agrees that no additional archaeological survey is necessary. Architectural resources within the Area of Potential Effect (APE) were previously addressed in relation to the Green Chapel Extension Transmission Line Project. None were listed on or recommended eligible for the National Register of Historic Places (NRHP) and our office agreed with these recommendations in a letter dated September 27, 2022 (2022-LIC-55825). We agree that there will be no effect on historic resources as a result of the project.

Based on the information provided, we agree 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,

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

RPR Serial No: 1103903

In reply, refer to
2024-LIC-61771

October 20, 2025

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

RE: Kiber Station Greenfield Project, Monroe Township, Licking County, Ohio – Addendum 1

Dear Mr. Weller:

This letter is in response to the correspondence received on September 22, 2025, regarding the proposed Kiber Station Greenfield Project located in Monroe Township, Licking 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 *Addendum 1: Phase I Cultural Resource Management Investigations for the Kiber Station Greenfield Project in Monroe Township, Licking County, Ohio* by Seth T. Cooper (Weller & Associates, Inc. 2025). These investigations were conducted for areas located outside those previously surveyed for the proposed Kiber Station, which is located north of Green Chapel Road NW. A literature review, visual inspection, shovel probes, and shovel test excavations were completed as part of the investigations. Portions of the project area have been previously surveyed; however, no archaeological sites have been documented within the addendum project area. Areas of inundation and disturbance from the construction of two modern residences were noted within the addendum project area. No new archaeological sites were identified through the current investigations. Our office agrees that no additional archaeological survey is necessary. Architectural resources within the Area of Potential Effect (APE) have been previously addressed in relation to this project.

Based on the information provided, we continue to 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 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,

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

RPR Serial No: 1110950

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

In reply, refer to
2024-LIC-61771

December 8, 2025

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

RE: Kiber Station Greenfield Project, Jersey Township, Licking County, Ohio – Addendum 2

Dear Mr. Weller:

This letter is in response to the correspondence received on November 20, 2025, regarding the proposed Kiber Station Greenfield Project located in Monroe Township, Licking 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 *Addendum 2: Phase I Cultural Resource Management Investigations for the Kiber Station Greenfield Project in Monroe Township, Licking County, Ohio* by Seth T. Cooper (Weller & Associates, Inc. 2025). These investigations addressed areas not investigated during previous surveys conducted for this project. A literature review, visual inspection, and shovel test unit excavations were conducted for these investigations. There were no documented archaeological sites located within the addendum project area, nor were any new archaeological sites identified during the current investigations. Architectural resources in the area have been previously addressed and determined to be not eligible for the NRHP. No additional archaeological survey is recommended.

Based on the information provided, we continue to 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 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,

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

RPR Serial No. 1111801

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

In reply, refer to
2024-LIC-61771

December 5, 2025

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

RE: Kiber Station Transmission Line Tie-in Project, Jersey Township, Licking County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on November 3, 2025, regarding the proposed Kiber Station Greenfield Project located in Monroe Township, Licking 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 *Cultural Resource Management Investigations for the Kiber Station Transmission Line Tie-in Project in Jersey Township, Licking County, Ohio* by Ryan J. Weller (Weller & Associates, Inc. 2025). These investigations were conducted for an approximately 22.1-acre project area located on the north and south sides of Green Chapel Road in Licking County, Ohio. Per the literature review, much of the project area has been previously surveyed, aside from a small portion that was inaccessible due to landowner concerns. There are three (3) previously documented Ohio Archaeological Inventory (OAI) sites (33LI3357, 33LI3377, and 33LI4313) located within the project area; however, our office has previously agreed that these sites are not eligible for the National Register of Historic Places (NRHP; letter dated August 1, 2023). Architectural resources in the area have likewise been previously addressed and determined to be not eligible for the NRHP. No additional archaeological survey is recommended.

Based on the information provided, we continue to 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 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,

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

RPR Serial No: 1111577

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

Office of Real Estate
Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, Ohio 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

January 12, 2024

Bridgette Glass
AECOM
707 Grant Street, 5th Floor
Pittsburgh, Pennsylvania 15219

Re: 23-1458_Kiber Station

Project: The proposed project involves the construction of a new greenfield substation (approximately 10-acre or less) as per a customer request.

Location: The proposed project is located in Monroe Township, Licking 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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

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

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

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

December 1, 2023

Project Code: 2024-0017970

Dear Bridgette Glass:

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

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

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

Sincerely,

Scott Hicks

Scott Hicks
Acting Field Office Supervisor

Appendix D Ecological Survey Report – Kiber Station

KIBER STATION PROJECT
LICKING COUNTY, OHIO

ECOLOGICAL REPORT

Prepared for:
American Electric Power Ohio Transmission Company
8500 Smiths Mill Road
New Albany, Ohio 43054

Prepared by:

525 Vine Street, Suite 1900
Cincinnati, Ohio 45202

Project #: 60716171

October 2025

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1.0 INTRODUCTION

American Electric Power Ohio Transmission Company (AEP Ohio Transco) proposed the construction of a new greenfield substation (approximately 10-acres or less) located in Licking County, Ohio (OH). The Project Survey Area associated with this Ecological Report is located within the Johnstown and Jersey, OH United States Geological Survey (USGS) 7.5-minute topographical quadrangles as displayed on the Project Location Map (**Figure 1**).

The purpose of the field survey was to assess the presence of wetlands and possible "waters of the United States" (WOTUS) that occur within the proposed Project area. Secondarily, land uses were also recorded to classify and characterize potential habitat for threatened, and endangered species. This report will be used to assist AEP Ohio Transco's efforts to identify potential WOTUS and threatened and endangered species habitat present within the proposed Project area to avoid or minimize impacts during construction activities.

2.0 METHODOLOGY

The field survey was completed within the Project Survey Area totaling approximately 28.5 acres. Prior to conducting field surveys, digital United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey data, United States Fish and Wildlife Service (USFWS), National Wetlands Inventory (NWI) data, USGS National Hydrography Dataset (NHD), Federal Emergency Management Agency (FEMA) 100-year floodplain data, and USGS 7.5-minute topographic maps were reviewed to identify the occurrence and location of potential wetland areas and/or streams.

Field survey activities included recording the physical boundaries of observed water features using sub-meter capable EOS Arrow Global Positioning System (GPS) units in conjunction with the ArcGIS Field Maps application on iPad tablets. The GPS data was imported into ArcMap Geographic Information System (GIS) software, where the data was reviewed, edited for accuracy, and compiled in a format suitable for transfer and use by AEP Ohio Transco. Water features were delineated and assessed based upon the appropriate procedures detailed below. Land uses observed within the Project Survey Area were assigned a general classification based upon the principal land characteristics and vegetative cover of the location.

2.1 WETLAND DELINEATION

The Project Survey Area was evaluated according to the procedures outlined in the United States Army Corps of Engineers (USACE) *Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory, 1987) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)* (USACE, 2010).

During field survey activities AECOM utilized the routine on-site delineation method described in the *1987 Manual* and *Regional Supplement* that consisted of a pedestrian site reconnaissance, including identifying the vegetative communities, soils identification, a geomorphologic assessment of hydrology, and notation of disturbance. If a wetland was identified, AECOM completed a USACE Wetland Determination Data Form (USACE Data Form) within each unique wetland habitat to serve as a representative of the wetland hydrology, vegetative community, and soil characteristics. Adjacent to each wetland complex, AECOM completed an additional USACE Data Form as a representative of the upland community.

2.1.1 WETLAND CLASSIFICATION

Wetlands identified in the field were classified based on the naming convention found in *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin *et al.*, 1979). The unique wetland habitats were classified as palustrine emergent (PEM), palustrine forested (PFO), palustrine unconsolidated bottom (PUB), palustrine scrub-shrub (PSS), or other classifications for some wetlands. Multiple Cowardin classifications may be present where more than one classification's vegetation is dominant (vegetation type covers 30 percent or more of the substrate). Where multiple Cowardin classifications are present, the Cowardin classification of the plants that constitute the uppermost layer of vegetation having 30% or greater coverage is used for the classification.

2.1.2 WETLAND ASSESSMENT

Each delineated wetland was assessed following the Ohio Environmental Protection Agency (OEPA) *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) (Mack, 2001). Wetland assessments utilized the 10-page ORAM form, providing a final Category rating for each wetland. Wetlands are rated as either a Category 1, Category 2, or Category 3 wetland, with the former being the least pristine and the latter being the most pristine.

2.2 STREAM ASSESSMENT

Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high-water mark (OHWM). The USACE defines the OHWM as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas" (USACE, 2005).

2.2.1 OEPA PRIMARY HEADWATER HABITAT ASSESSMENT

Stream assessments were conducted using the methods described in the OEPA's *Methods for Assessing Habitat in Flowing Waters*: *Using OEPA's Qualitative Habitat Evaluation Index (QHEI)* (Rankin, 2006) and in the OEPA's *Field Methods for Evaluating Primary Headwater Streams in Ohio* (OEPA, 2020). Streams

associated with watershed area less than or equal to 1.0 square mile (259 hectares), and a maximum depth of water pools equal to or less than 15.75 inches were evaluated utilizing the Headwater Habitat Evaluation Index (HHEI) methodology and all other streams assessed using the QHEI methodology. Flow regime (ephemeral, intermittent, perennial) was determined by the appropriate stream assessment score per OEPA manuals (OEPA, 2020) and by AECOM's professional opinion.

Streams assessed in the Project Survey Area were reviewed for existing OEPA Aquatic Life Use Designations per OEPA's Water Quality Standards (OAC Chapter 3745-1). Those without an existing use designation were assigned a provisional aquatic life use designation based upon habitat assessment results (Rankin, 1989; OEPA, 2020).

2.2.2 OEPA 401 WATER QUALITY CERTIFICATION FOR NATIONWIDE PERMIT ELIGIBILITY

The OEPA has designated each watershed in the state based on whether it may be ineligible for coverage under the OEPA's 401 Water Quality Certification (WQC) for Nationwide Permits (NWPs) (OEPA, 2023). Mapping provided by the OEPA illustrates the eligibility of streams in the area to fall under an NWP for 401 certification or if an individual state WQC needs to be applied for. Impacts to streams within each watershed would then have eligibility for 401 WQC determined by the watershed category. The three categories are defined as:

Eligible: Streams within the watershed are eligible for coverage under the OEPA's water quality certification for the Nationwide Permits if all other general and regional special terms and conditions are met.

Ineligible: Projects affecting high quality streams and undesignated streams draining directly to high quality streams, as represented in the map, must undergo an individual 401 WQC review process.

Possibly Eligible: Additional field screening procedures are required for streams in the watershed to determine appropriate eligibility. Projects affecting undesignated streams within those HUC12 watersheds that do not directly but eventually drain into high quality waters, might be eligible for coverage under the OEPA's 401 WQC for NWPs depending on the results of a field screening assessment. The procedures for determining individual stream eligibility in this scenario are specified in **Appendix C** "Stream Eligibility Determination Process" of the OEPA Ohio State Water Quality Certification of the 2017 Nationwide Permit Reauthorization (OEPA, 2017).

2.2.3 UPLAND DRAINAGE FEATURES

An upland drainage feature (UDF) is a non-jurisdictional drainage that does not meet the criteria of either a jurisdictional stream or a wetland. A UDF generally lacks an OHWM (USACE, 2005) and are equivalent to a swale or an erosional feature as described by the USACE: "generally shallow features in the landscape that may convey water across upland areas during and following storm events. Swales usually occur on

nearly flat slopes and typically have grass or other low-lying vegetation throughout the swale" (USACE, 2005).

A roadside ditch may also be documented as a UDF if it meets the "not potentially jurisdictional" characterization as described in the Office of Environmental Services *Roadway Ditch Characterization Flowchart* (Ohio Department of Transportation, 2014). This would include a ditch that originates entirely within the roadway right-of-way, has a seasonal flow regime, was not constructed to drain a wetland, and does not have hydrophytic vegetation extending more than an insignificant amount beyond its original configuration.

In addition, UDF's (including swales, ditches, and other erosional features) are generally not WOTUS except in certain circumstances, such as relocated streams.

2.3 RARE, THREATENED, AND ENDANGERED SPECIES

AECOM conducted a threatened and endangered species review and general field habitat surveys within the Project Survey Area. AECOM submitted requests to the Ohio Department of Natural Resources (ODNR) Office of Real Estate – Environmental Review Section and the USFWS Ohio Ecological Services Field Office soliciting comments on the proposed Project. Agency-identified species of concern and available species-specific information was reviewed to identify the various habitat types that listed species are known to inhabit.

AECOM field ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys as part of assessing potential impacts to threatened and endangered species. Land uses within the Project Survey Area were assigned a general classification based upon the principal land characteristics and vegetative cover as observed during the field surveys.

AECOM conducted a desktop assessment of the Project Survey Area and a quarter-mile buffer around it to identify potentially occurring winter bat hibernaculum that may be present near the Project which is in **Appendix A**. This assessment was conducted by reviewing data on mining activity and karst geology from the ODNR Division of Mineral Resources and USGS websites.

3.0 RESULTS

AECOM ecologists walked the Project Survey Area to conduct the wetland delineation, stream assessment and habitat survey, one PEM wetland (W-MRK-001), one PSS wetland (W-AGS-001), one perennial stream (S-AGS-001), one ephemeral stream (S-AGS-009) and one UDF (UDF-AGS-001) were identified. Ecological Investigations were completed initially on January 26 and April 19, 2024. Due to those surveys being completed outside of the typical growing season, a verification survey of the delineated features was conducted on July 3, 2024, confirming the presence of the wetlands. An additional Ecological Investigation

was completed on January 28, 2025, upon the expansion of the study area. During this investigation, an additional PEM wetland along Duncan Run was identified on the western boundary of the study area (W-AGS-001). On July 28, 2025, AECOM completed an additional survey due to the expansion of the study area. During this investigation AECOM ecologists determined W-AGS-001 classification needed to change from PEM to PSS. On September 18, 2025, AECOM completed an additional survey on a residential property located on Green Chapel Road. No new features were discovered during this survey. The representative wetland data forms as well as photo documentation are provided as **Appendix B.**

3.1 WETLAND DELINEATION

3.1.1 PRELIMINARY SOILS EVALUATION

According to the USDA/NRCS Web Soil Survey, three soil map units are mapped within the Project Survey Area (USDA NRCS, 2023a and 2023b). Of these, one was identified as hydric soil, and two were identified as containing hydric inclusions. Soils indicated as hydric inclusions are not predominately hydric soils and hydric soils are more likely to be found in topographic settings. **Table 1** below provides a detailed overview of all soil series and soil map units present within the Project Survey Area. Soil map units located in the Project Survey Area and vicinity are shown on **Figure 2**.

TABLE 1 - SOIL MAP UNITS AND DESCRIPTIONS WITHIN THE PROJECT SURVEY AREA

Soil Series	Map Unit Symbol	Map Unit Description	Topographic Setting	Hydric	Hydric Component (%)
Bennington	BeA	Bennington silt loam, 0 to 2 percent slopes	Ground moraines, end moraines	Yes*	Condit 5%, Pewamo – Low carbonate till 3%
	BeB	Bennington silt loam, 2 to 6 percent slopes	End moraines, ground moraines	Yes*	Condit 3%, Pewamo – Low Carbonate till 3%
Pewamo	Pe	Pewamo silty clay loam, low carbonate till, 0 to 2 percent slopes	Drainageways, depressions	Yes	Pewamo-Low carbonate till 85%, Condit 9%

Yes* = Hydric inclusion present

3.1.2 NATIONAL WETLAND INVENTORY MAP REVIEW

According to NWI data covering the Project location, the Project Survey Area contains one Riverine, Perennial, Unconsolidated Bottom, Palustrine, Permanently Flooded (R5UBH) wetland. The feature was field verified as S-AGS-001, a perennial stream and continues outside of the Project Survey Area. The locations of the NWI mapped wetlands in the Project vicinity are shown on **Figure 2**.

3.1.3 DELINEATED WETLANDS

During the field survey on January 26, 2024, AECOM delineated one PEM wetland (W-MRK-001) and re-visited the wetland to confirm conditions on April 19 and July 3, 2024. Following this site assessment, additional surveys area was requested, and AECOM completed an additional survey on January 28, 2025, with identification of another PEM wetland (W-AGS-001) within the Project Survey Area. On July 28,2025 AECOM completed an additional survey, due to the recent finding W-AGS-001 wetland classification has been changed to PSS. Both PEM/PSS wetlands were assigned ORAM Category 1. The boundaries of these delineated wetlands are provided on **Figures 2 and 3**.

Wetlands Identified within a previous Preliminary Jurisdictional Area Summary

W-MRK-001 (PEM) Site Assessment Summary

During the initial site visit completed on January 26, 2024, several primary indicators of wetland hydrology were noted including the water table present at the surface and oxidized rhizospheres on living plant roots (**Appendix B**). In the field investigation conducted on April 19 and July 3, 2024, oxidized rhizospheres were also detected, and two secondary indicators of geomorphic position and the FAC-Neutral Test were confirmed with a dominance of hydrophytic vegetation and presence of hydric soil within the boundary of the delineated wetland. Additionally, AECOM ecologists determined that the area was collecting surface runoff from the surrounding areas and draining to the north towards another agricultural field. Based on historic aerials, the area of the wetland identified was previously agricultural with visible drainage tiles and current site investigations identified that the site is now fallow, and those drainage tiles may no longer function. Under this evidence, AECOM determined that W-MRK-001 is a seasonal wetland with fluctuating water table levels. Due to these seasonal fluctuations in hydrology, the boundary of the wetland was determined by the presence of hydrophytic vegetation in conjunction with the presence of hydric soils.

Vegetation present during the winter and summer field visits passed the rapid test for hydrophytic vegetation, the Dominance Test and the Prevalence Index. The boundary of the wetland was established due to the presence of the dominant wetland species, including Silky dogwood (*Cornus amomum)*, a facultative wet species and Purple-leaf willowherb *(Epilobium coloratum)*, an obligate species, which were absent in the upland areas that displayed non-hydric soils.

The soil profile indicated a depleted matrix observed within the upper 16 inches of the soil profile. Immediately outside of the boundary of the wetland non-hydric soils were found composed of a 10YR 5/3.

W-AGS-001 (PSS) Site Assessment Summary

AECOM completed a site investigation of the wetland habitat area on January 28, 2025, as site conditions of the wetland were able to be identified at the time of the survey. The identified wetland habitat was predominately composed of Wool grass (*Scirpus cyperinus)* that is easily identifiable even during winter

conditions that allowed to establish the boundary of the wetland. Due to the survey being completed outside of the typical growing season, a follow up survey was done to verify wetland presence and classification. On July 28, 2025, a second survey was completed to verify wetland habitat during the active growing season. Upon completion of the survey the current W-AGS-001 PEM changed classification to a PSS wetland habitat due to the predominance of Wool grass (*Scirpus Cyperinus*) and Eastern Cottonwood (*Populus deltoides)*. The saplings of *Eastern Cottonwood* covered over 30% of the wetland area and heights did not exceed 15'. The wetland extends outside of the survey area and is isolated. Wetland hydrology collects within the slightly concave area of the established wetland boundary with the verification of the presence of oxidized rhizospheres on living roots. The boundary was further evaluated for soils and identified the presence of a depleted matrix within the established boundaries of the wetland. For these reasons, AECOM understands that this established boundary would meet the federal definition of a wetland.

Jurisdictional Summary

AECOM has given wetlands W-AGS-001 and W-MRK-001 within the Project Survey Area a preliminary determination of non-jurisdictional (isolated, non WOTUS). Final jurisdictional status can only be determined by the USACE, and AECOM assessments are provisional. The locations and approximate extent of the wetlands identified within the Project Survey Area are shown on **Figure 3**. Details for each delineated wetland in the Project Survey Area are provided in **Table 2**. Completed USACE Data Form and photographs of the delineated wetlands are provided in **Appendix B**.

TABLE 2 – SUMMARY OF DELINEATED WETLANDS WITHIN THE PROECT SURVEY AREA

Wetland ID	Location		Isolated?	Habitat Type	Delineated Area (acre)	ORAM		Nearest Structure # (Existing / Proposed)	Existing Structure # in Wetland	Proposed Structure # in Wetland	Structure Installation Method	Proposed Impacts	
	Latitude	Longitude				Score	Category					Temporary Matting Area (acre)	Permanent Impact Area (acre)
W-MRK-001	40.126941	-82.727296	Yes	PEM	0.77	24	1	None	None	N/A	N/A	0	0.77
W-AGS-001	40.127059	-82.72940	Yes	PSS	0.12	31	2	None	None	N/A	N/A	0	0
Total:					**0.89**							**0**	**0.77**

3.2 STREAM DELINEATION

During the field survey, AECOM identified one perennial stream (S-AGS-001) and one ephemeral stream (S-AGS-009) within the Project Survey Area (**Figure 3**). The perennial stream (S-AGS-001) had an existing OEPA Aquatic Life Use Designation of Warmwater Habitat (WWH) under Ohio Revised Code (ORC) Chapter 3745-1, which take precedent over any HHEI or QHEI evaluations.

AECOM has provided a provisional determination that all delineated streams within the Project Survey Area appear to be jurisdictional (i.e., WOTUS), based on their observed or presumed confluence with downstream waters. Final jurisdictional status can only be determined by the USACE, and AECOM assessments are provisional. A summary of the delineated features is provided in **Table 3**. Photographs of the delineated stream resource are provided in **Appendix C.**

TABLE 3 – SUMMARY OF DELINEATED STREAMS WITHIN THE PROECT SURVEY AREA

Stream ID	Location		Stream Type	Stream Name	Delineated Length (feet)	Bankfull Width (feet)	OHWM Width (feet)	Field Evaluation			Ohio EPA 401 Eligibility	Stream Crossing?	Proposed Impacts	
	Latitude	Longitude						Method	Score	Category / Rating / OAC Designation			Fill Type	Area (acre)
S-AGS-001	40.12487	-82.72929	Perennial	Duncan Run	134	11	7	Ch. 3745-1	N/A	Warmwater Habitat	Eligible	N/A	N/A	N/A
S-AGS-009	40.1260745	82.7292594	Ephemeral	UNT to Duncan Run	45	2.5	2.5	HHEI	19	Class I PHW	Eligible	N/A	N/A	N/A
Total:					**179**									**0**

3.2.1 OEPA STREAM ELIGIBILITY

The Project occurs across two watersheds, designated by 401 WQC eligibility, as listed in **Table 3**. OEPA stream eligibility mapping for the Project vicinity, is provided on **Figure 4**.

TABLE 4 – SUMMARY OF WATERSHED 401 WQC ELIGIBILITY WITHIN THE PROJECT SURVEY AREA

HUC-12	Watershed	401 WQC Eligibility	Number of Stream Assessments
050400060301	Headwaters Raccoon Creek	Eligible	0
050600011307	Duncan Run	Eligible	2
		Total	**2**

3.3 FEMA 100 YEAR FLOODPLAINS

One regulated FEMA 100-year floodplain, associated with S-AGS-001 (Duncan Run), is located within the Project Survey Area and is displayed on **Figure 2** (FEMA, 2024).

3.4 PONDS

During the field survey, AECOM did not identify any ponds within the Project Survey Area.

3.5 UPLAND DRAINAGE FEATURES PONDS

During the field survey, AECOM identified one upland drainage feature within the Project Survey Area. The extent of the upland drainage feature is displayed on **Figures 2 and 3**. Photographs of the delineated upland drainage features are provided in **Appendix D**

3.6 VEGETATIVE COMMUNITIES

AECOM ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys. As described in **Table 5**, below, the Project Survey Area contains landscaped, old field, pasture/hay field, streams/wetlands, urban, and woodland areas. Habitat descriptions applicable to the Project are provided below. Vegetative communities are depicted visually on aerial photography in **Figure 5**. Representative photographs of the vegetative communities in the Project Survey Area are provided as **Appendix E**.

TABLE 5 - VEGETATIVE COMMUNITIES WITHIN THE PROJECT SURVEY AREA

Vegetative Community	Description	Approximate Acreage Within the Project Survey Area	Approximate Percentage Within the Project Survey Area
Landscaped	Landscaped areas, including residential properties and commercial properties, and are frequently mowed and maintained, comprised of grasses and forbs.	8.44	29.6
Old Field	Herbaceous cover exists alongside roads, field borders, and abandoned fields within the survey area of the Project in the form of successional old-field communities. These communities are the earliest stages of recolonization by plants following disturbance. This community type is typically short-lived, giving way progressively to shrub and forest communities unless periodically re-disturbed, in which case they remain as old fields. The old-field areas within the study corridors and adjacent areas are infrequently mowed areas of grasses, forbs, and occasional shrubs.	16.07	56.4
Pasture/Hay Fields	Cattle and/or horse pasture, and hay fields, dominated by seasonally mowed and grazed areas of grasses and forbs.	2.40	8.4
Streams/Wetlands	Wetlands were observed within the survey area for the Project	0.80	2.8
Urban	Urban areas are areas developed with residential and commercial land uses, including roads, buildings and parking lots. These areas are generally devoid of significant woody and herbaceous vegetation.	0.25	1.0
Woodlands	Woodlands (floodplain, upland, successional-mixed, etc.) are present along the Project Survey Area.	0.30	0.01
Scrub-shrub	Areas bisecting fields within the survey area that are dominated by shrubs and herbaceous vegetation.	0.25	0.01
	Totals:	**28.50**	**100%**

3.7 RARE, THREATENED AND ENDANGERED SPECIES AGENCY COORDINATION

Protected Species Agency Consultation –

On November 28, 2023, coordination letters were sent to USFWS and the ODNR Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review for potential impacts to threatened and endangered species for a project adjacent to the Project Survey Area.

Responses were received from the USFWS on December 1, 2023, and from the ODNR on January 12, 2024. According to a response letter received from the USFWS, due to the project, type, size, and location, no adverse effects are anticipated for any federally endangered, threatened, or proposed species or proposed or designated critical habitat. Regarding state threatened and endangered species that may occur

within the Project vicinity, six species were listed by the ODNR. Correspondence letters from the USFWS and ODNR for the Kiber Station Project are included as **Appendix F**.

Table 6 provides a list of species of concern identified by the agencies as potentially occurring within the vicinity of the Project. Photographs of the habitat within the Project Survey Area are provided as **Appendix E**.

TABLE 6
ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT SURVEY AREA

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Mammals							
Indiana Bat (*Myotis sodalis*)	Endangered	Endangered	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat Within the Project Survey Area, trees were identified that could provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project Survey Area and seasonal tree clearing, between October 1 and March 31, is recommended. Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.
Northern Long-eared Bat (*Myotis septentrionalis*)	Endangered	Endangered	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat Within the Project Survey Area, trees were identified that could provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Additionally, the ODNR indicated that there is a known presence of this species within the Project area and summer surveys would not constitute a presence or absence of this species. Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project Survey Area and seasonal tree clearing, between October 1 and March 31, is recommended. Additional summer surveys would not constitute presence/absence within the Project area for the northern long-eared bat. Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.
Little brown bat (*Myotis lucifugus*)	Endangered	NA	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat Within the Project Survey Area, trees were identified that could provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project Survey Area and seasonal tree clearing, between October 1 and March 31, is recommended. Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.

TABLE 6
ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT SURVEY AREA

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Tricolored bat (*Perimyotis subflavus*)	Endangered	Proposed	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat Within the Project Survey Area, trees were identified that could provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project Survey Area and seasonal tree clearing, between October 1 and March 31, is recommended. Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.
Fish							
Lake Chubsucker (*Erimyzon sucetta*)	Threatened	None	Perennial Streams	One perennial stream, S-AGS-001, was identified within the Project Survey Area.	N/A	Due to the location, and that there is no in-water work proposed in a perennial stream, this Project is not likely to impact this species.	No
Reptiles							
Eastern Massasauga (*Sistrurus catenatus*)	Endangered	Threatened	This species uses wet prairies, fens, wetlands, and drier upland habitat.	Wetlands, drier upland habitat	N/A	Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.	No
Birds							
Northern Harrier (*Circus hudsonius*)	Endangered	None	This species hunts over grasslands and nests can be found in large marshes and grasslands.	**No** – Based on desktop and field reviews, the Project area is situated within a rural residential landscape.	April 15 to July 31	Habitat should be avoided during the bird's nesting period between April 15 through July 31. If habitat will not be impacted, this Project will not likely impact the species.	No
Sandhill Crane (*Antigone canadensis*)	Threatened	None	This species is a primarily wetland-dependent species. They roost in shallow, standing water, or moist bottoms lands over winter. For breeding, they require a large tract of wet meadow, shallow marsh, or bog for nesting.	**No –** Based on desktop and field reviews, the Project does not have any large tract wet meadows, shallow marshes or bogs.	April 1 to August 31	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.	No

*2024 Joint Guidance – Refers to the 2024 ODNR DOW and USFWS Joint Guidance for Bat Surveys and Tree Clearing, a copy of the guidance is provided within **Appendix G** of this report.

Protected Species Agency Summary –

Based on general observations during the ecological field survey, forested areas were identified within the Project survey area and tree clearing is proposed as part of the Project. The ODNR and the USFWS recommend implementations of seasonal tree clearing between October 1 and March 31 to avoid adverse effects to Indiana bat, northern long-eared bat, little brown bat, and tricolored bat. ODNR confirmed a known presence in the vicinity of the Project area for the northern long-eared bat. If trees must be cut during the summer months, the ODNR recommends that a mist net survey could be completed for the Indiana bat, little brown bat, and the tricolored bat between June 1 and August 15. However, additional summer surveys would not constitute presence/absence within the Project survey area for the northern long-eared bat. If summer tree clearing is needed, additional coordination would be completed with ODNR and the USFWS.

AECOM completed a desktop review for potential hibernaculum in accordance with the 2024 Ohio ODNR DOW and the USFWS Joint Guidance for Bat Surveys and Tree Clearing within 0.25 miles of the Project Survey Area and no caves, mines, and/or karst features were identified. As per ODNR guidance, further coordination regarding potential hibernaculum is only necessary if the habitat assessment finds potential habitat within 0.25 miles of the Project Survey Area. Therefore, no further coordination is necessary with either the ODNR and/or the USFWS regarding the listed bat species. Results of the desktop habitat assessment are included in **Appendix A**.

No impacts are anticipated to occur to the fish and reptile species listed in Table 6, as no in-water work is proposed as part of the Project. The ODNR noted that the Project is within the range of the northern harrier and sandhill crane; however, AECOM ecologist and approved avian specialist concluded an absence of this species nesting habitat within the Project Survey Area. According to ODNR, open grasslands and wet meadow marshes, of at least 2-acres, is considered nesting habitat for the northern harrier. The sandhill crane roosts in shallow, standing water, or moist bottoms lands over winter. For breeding, they require a large tract of wet meadow, shallow marsh, or bog for nesting. Based on field and desktop review, the Project Survey Area is situated within a rural residential landscape and consists of private residencies interspersed with maintained lawns (landscaped areas), wetlands, patches of old field habitat, and pasture/hayfields. While suitable landcover types (old field habitat, pasture/hayfields, and wetlands) are present, the area is situated amongst a residential landscape and thus excludes it from the consideration of potential habitat due to edge effect and potential for predation of the ground nesting birds. As there are no open grasslands, wet meadow marshes, or large, expansive fields of suitable landcover that would meet the ODNR requirement for size (>2-acres); there is no suitable nesting habitat within the Project Survey Area. No further coordination regarding these listed species are warranted for this Project.

4.0 SUMMARY

The ecological surveys of the Project Survey Area identified one PEM and one PSS wetland, one perennial and one ephemeral stream, no ponds, and one upland drainage feature. The representative wetland data forms and photo documentation are provided in **Appendix B**.

The reported results of the ecological survey conducted by AECOM on this Project are limited to the areas within the Project Survey Area provided in **Figure 3**. Areas that fall outside of the Project Survey Area were not evaluated in the field and not included in the reporting of the survey.

Of the six state and/or federally listed threatened and endangered species within range of the Project Survey Area, no habitat for any of the listed fish, or bird species were identified within the Project Survey Area. If tree clearing activities are required, the ODNR recommend a seasonal tree clearing be completed between October 1 and March 31. If summer tree clearing is required, further coordination is anticipated to be required with the ODNR.

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

5.0 REFERENCES

Cowardin, L.M., V. Carter, F.C. Golet and E.T. LaRoe. 1979. *Classification of Wetlands and Deepwater Habitats of the United States.* Office of Biological Services, U.S. Fish and Wildlife Service, Washington, D.C.

Environmental Laboratory. 1987. *United States. Corps of Engineers Wetlands Delineation Manual.* Technical Report Y-87-1, U.S. Army Engineer Waterways Experiment Station: Vicksburg, Mississippi.

Federal Emergency Management Agency. 2024. National Flood Hazard Layer, Licking County, Ohio. https://msc.fema.gov/portal. Published July 31, 2024.

Mack, John J. 2001. *Ohio Rapid Assessment Method for Wetlands v. 5.0, User's Manual and Scoring Forms. OEPA Technical Report WET/2001-1*. Ohio Environmental Protection Agency, Division of Surface Water, 401/Wetland Ecology Unit, Columbus, Ohio.

Ohio Department of Transportation. 2014. Roadway Ditch Characterization Flowchart. From: Ecological Manual, April 2014. Office of Environmental Services.

Ohio Division of Wildlife and United States Fish and Wildlife Service (USFWS) (OH-Field Office). 2024. Joint Guidance for Bat Surveys and Tree Clearing. Published May 2024.

Ohio Environmental Protection Agency (OEPA). 2017. Section 401 Water Quality Certification for the 2017 Nationwide Permits. Appendix C Stream Eligibility Determination Process. Effective March 17, 2017. Ohio Environmental Protection Agency, Division of Surface Water, 401 Water Quality Certification and Isolated Wetland Permitting Section, Columbus, Ohio.

OEPA. 2024. 401 Water Quality Certification for the Nationwide Permits Stream Eligibility Web Map (Updated January 24, 2024). https://data-oepa.opendata.arcgis.com/datasets/401-water-quality-certification-for-nationwide-permits

OEPA. 2020. *Field Methods for Evaluating Primary Headwater Streams in Ohio*. Version 4.1. Ohio EPA Division of Surface Water, Columbus, Ohio. May 2020. 130 pp.

Rankin, Edward T. 1989. *The Qualitative Habitat Evaluation Index (QHEI*): *Rationale, Methods, and Application*. Ohio EPA Ecological Assessment Section, Division of Surface Water, Columbus, Ohio.

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

United States Army Corps of Engineers (USACE). 2005. Regulatory Guidance Letter No. 05-05: Guidance on Ordinary High Water Mark Identification.

USACE. 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest (Version 2.0)*, ed. J. S. Wakeley, R. W. Lichvar, J. F. Berkowitz, and C. V. Noble. ERDC/EL TR-10-16. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

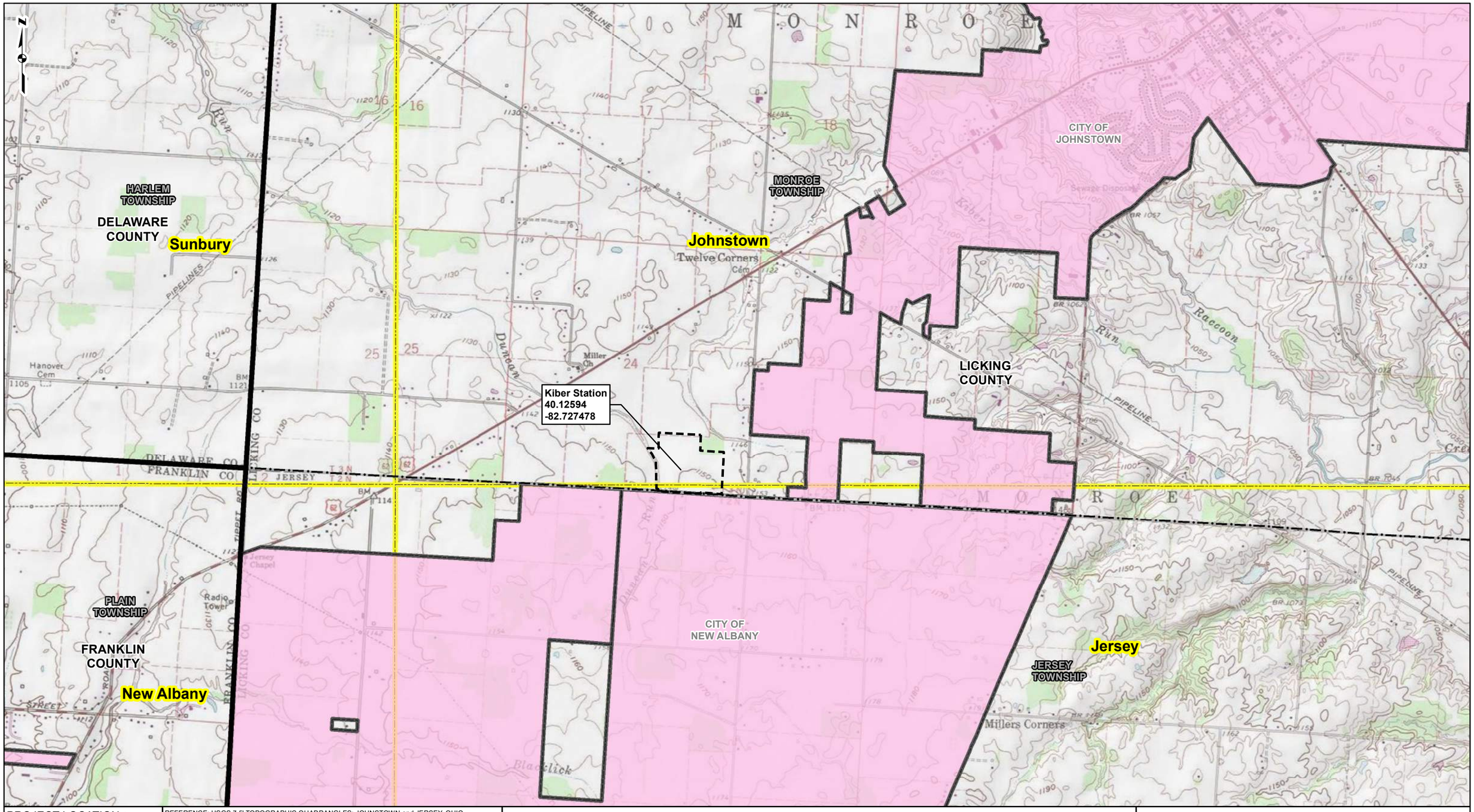
USACE. 2020. *National Wetland Plant List*, version 3.5. Engineer Research and Development Center. Cold Regions Research and Engineering Laboratory, Hanover, NH. http://wetland_plants.usace.army.mil/

United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). 2023a. National Hydric Soils List. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/use/hydric/. Accessed November 2024.

USDA, NRCS. 2023b. Web Soil Survey (GIS Shapefile). http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. Accessed November 2024.

USFWS. 2023. National Wetlands Inventory Geodatabase for Ohio. Available online at http://www.fws.gov/wetlands/Data/Mapper.html. Accessed November 2024.

United States Geological Survey. 2016. National Hydrography Dataset, Ohio Statewide Geodatabase. Published August 2016. Earth Science Information Center, USGS, Reston, VA.



PROJECT LOCATION

LICKING COUNTY, OHIO

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: JOHNSTOWN and JERSEY, OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 08/2025.

8/20/2025

LEGEND

- PROJECT SURVEY AREA
- MUNICIPAL BOUNDARY
- TOWNSHIP BOUNDARY
- COUNTY BOUNDARY
- OHIO USGS 7.5' TOPOGRAPHIC QUADRANGLE

0 1,000 2,000 4,000 Feet

FIGURE 1
PROJECT LOCATION MAP

AECOM

KIBER STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH

DATE: 8/20/2025
APPROVED:

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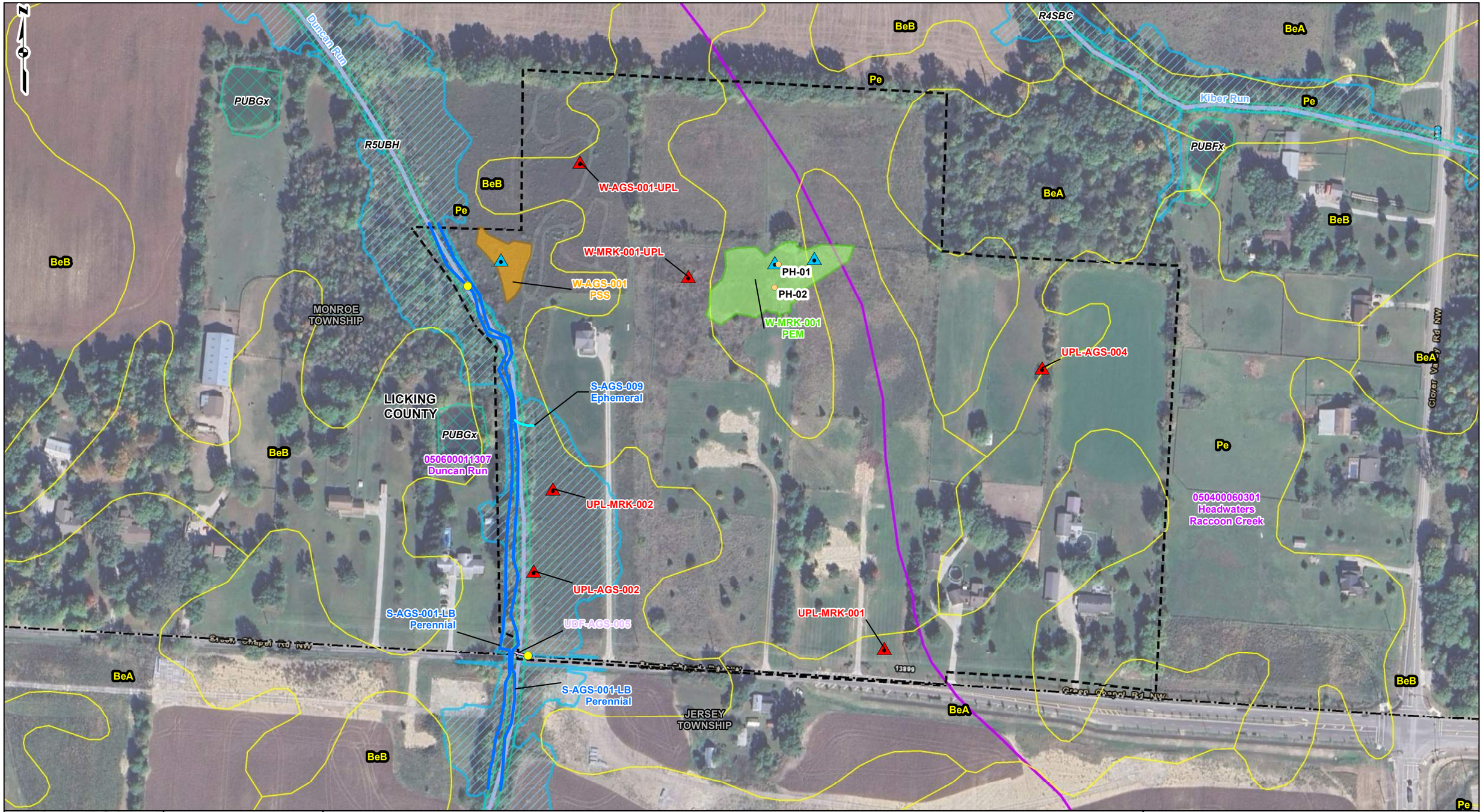

REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 08/2025. SOIL SURVEY GEOGRAPHIC (SSURGO), USDA/NRCS, 2024. NHD, USGS 2024. NWI, USFWS 2024. HUC 12, USGS 2024.

8/20/2025

LEGEND

- WETLAND PHOTOGRAPH LOCATION
- WETLAND DATA POINT
- UPLAND DATA POINT
- AECOM CULVERTS
- DELINEATED EPHEMERAL STREAM
- DELINEATED PERENNIAL STREAM
- PROJECT SURVEY AREA
- NHD STREAM (USGS)
- NWI WETLAND (USFWS)
- HUC 12 WATERSHED BOUNDARY
- 100-YEAR FEMA FLOODPLAIN
- SOIL MAP UNIT
  - BEA: BENNINGTON SILT LOAM, 0 TO 2 PERCENT SLOPES
  - BEB: BENNINGTON SILT LOAM, 2 TO 6 PERCENT SLOPES
  - PE: PEWAMO SILTY CLAY LOAM, LOW CARBONATE TILL, 0 TO 2 PERCENT SLOPES

0 100 200 400 Feet

FIGURE 2
SOIL MAP AND NATIONAL WETLANDS INVENTORY MAP

AECOM

KIBER STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: GIB
CHECKED: CJT | JH

DATE: 8/20/2025
APPROVED:

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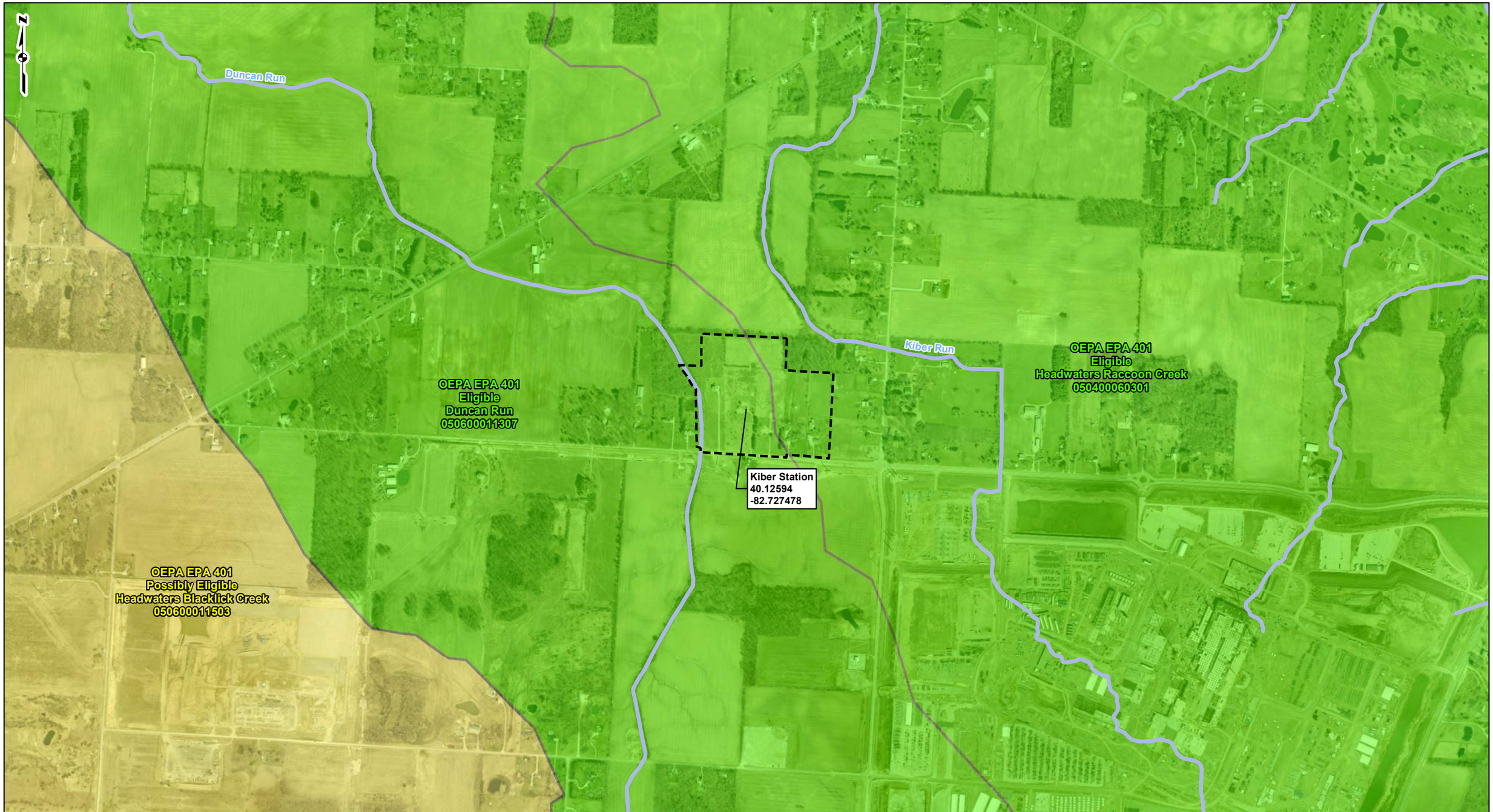

PROJECT LOCATION

LICKING COUNTY, OHIO

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ST CLAIRSVILLE, OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 08/2025. OEPA ELIGIBLE WATERSHEDS, OHIO ENVIRONMENTAL PROTECTION AGENCY, 2024.

8/20/2025

LEGEND

NHD STREAM (USGS)

PROJECT SURVEY

OEPA ELIGIBILITY:

ELIGIBLE

INELIGIBLE

POSSIBLY ELIGIBLE

0 500 1,000 2,000 Feet

FIGURE 4
STREAM ELIGIBILTY MAP

AECOM

KIBER STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH

DATE: 8/20/2025
APPROVED:

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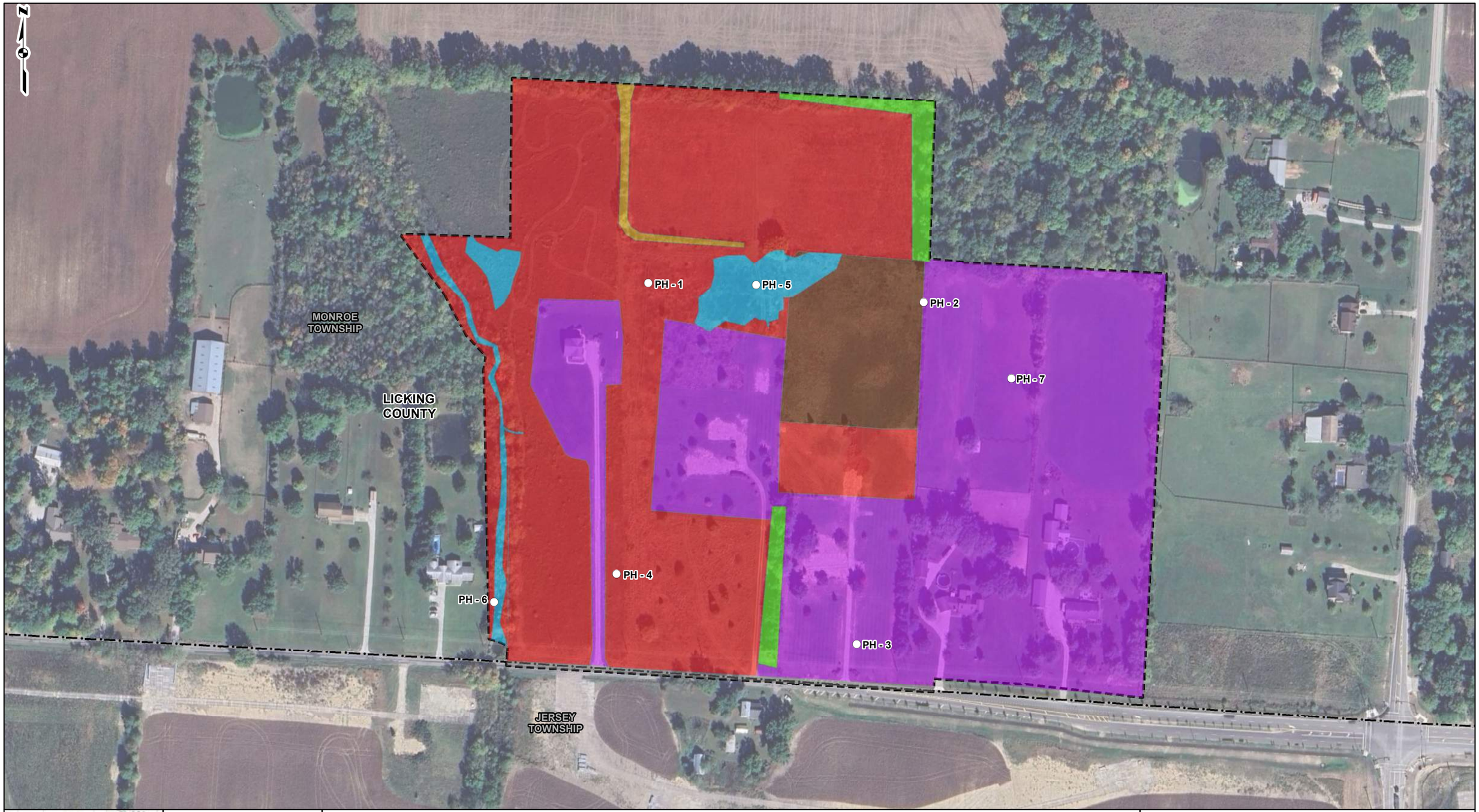


REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 08/2025.

8/20/2025

LEGEND

PROJECT SURVEY AREA
PHOTO LOCATION POINT
TOWNSHIP BOUNDARIES

VEGETATIVE COMMUNITY TYPE

LANDSCAPED
OLD FIELD
PASTURE/HAY FIELDS
SCRUB-SHRUB
STREAMS/WETLANDS
URBAN
WOODLANDS

0 100 200 400 Feet

FIGURE 5
VEGETATIVE COMMUNITIES ASSESSMENT MAP

AECOM

KIBER STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: GIB
CHECKED: CJT | JH
DATE: 8/20/2025
APPROVED:

Z:\Cincinnati-USCNC02\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60716171_Kiber_Station\2_MXDs\1_WDR\Kiber Station\KiberStation_WDR_Fig_5_.mxd

APPENDIX A

DESKTOP ASSESSMENT FOR WINTER BAT HABITAT

American Electric Power
8600 Smith's Mill Road
New Albany, OH 43054;
ajtoohey@ aep.com

November 28, 2023

Attention: Mr. Mike Pettegrew
Ohio Department of Natural Resources
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693

Transmitted via email: environmentalreviewrequest@dnr.ohio.gov; NHDRequest@dnr.ohio.gov

Reference: Project Review Request
Kiber Station, Monroe Township, Licking County, Ohio

Mr. Pettegrew:

AEP Ohio Transmission Company, Inc. (AEP), is formally requesting that the Ohio Department of Natural Resources (ODNR) completes an environmental review and a Natural Heritage Database (NHD) search request for the proposed Kiber Station (Project) located in Licking County, Ohio (OH). The purpose of this component is to build a new greenfield substation (approximately 10-acre or less) as per a customer request in Licking County, OH. The proposed survey area is approximately 4.4 acres and is located on the United States Geological Survey (USGS) Johnstown and Jersey, OH 7.5-minute topographical quadrangles as displayed on the Topographic Project Overview (Figure 1).

AECOM Technical Services, Inc. (AECOM) completed a desktop review of publicly available data to identify abandoned underground mines within 0.25-mile of the Project area. The data sources utilized included USGS topographical maps, aerial photography, and the ODNR's Division of Mineral Resources and Geological Survey Data for Known Mining Activity and Karst Geology/Sinkholes as shown on Figures 1 and 2. Based on the available desktop resources, there are no underground mines and/or karst features located within a 0.25-miles radius of the Project area that are anticipated to provide suitable hibernacula for cave-dwelling bats.

AECOM respectfully requests the results of the ODNR's environmental review, including results of the ODNR Natural Heritage Database search (see attached NHD Request Form) at your earliest convenience. If you have questions or need additional information regarding the Project, please contact me at the phone number or email below. Thank you for your assistance with this request.

Sincerely,

Brian Miller
Environmental Project Manager
Phone: (412-667-9172); brian.miller1@aecom.com

CC: Amy J. Toohey
Environmental Specialist-Consultant
Phone: (614-565-1480); ajtoohey@aep.com

Attachments (3): Figure 1 – Topographic Project Overview; Figure 2 – Aerial Project Overview; NHD Request Form; Electronic Shapefiles(.shp)

No mining activities, karst features, and/or sink holes are within the extent of the map frame. The closest feature is 2 miles northwest of the project area.

CITY OF JOHNSTOWN

LICKING COUNTY

MONROE TOWNSHIP

Kiber Station
40.124915
-82.723231

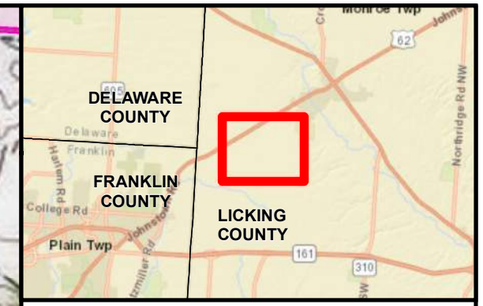
Johnstown

Jersey

MONROE TOWNSHIP

JERSEY TOWNSHIP

CITY OF NEW ALBANY



Legend

- Project Area
- County Boundary
- Township Boundary
- City Boundary
- Quarter Mile Review Area
- Ohio USGS 7.5' Topographic Quadrangle

N

0 1,000 2,000

Feet

AMERICAN ELECTRIC POWER

Kiber Station Project

FIGURE 1
TOPOGRAPHIC PROJECT OVERVIEW

DATE: 11/7/2023	1 INCH = 1,000 FEET
CREATED BY: JL	CHECKED BY:
JOB NO.: 60716171	AECOM

Date Saved: 11/7/2023
Document Path: X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60716171_Kiber_Station\2_MXDs\0_TE\Kiber_Station_ODNRFigure1_Topo_Overview.mxd

No mining activities, karst features, and/or sink holes are within the extent of the map frame. The closest feature is 2 miles northwest of the project area.

CITY OF JOHNSTOWN

LICKING COUNTY

MONROE TOWNSHIP

Kiber Station
40.124915
-82.723231

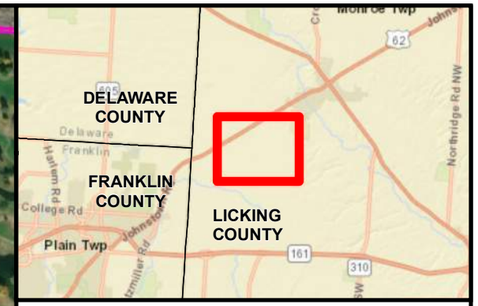
Johnstown

Jersey

MONROE TOWNSHIP

JERSEY TOWNSHIP

CITY OF NEW ALBANY



Legend

- Project Area
- County Boundary
- Township Boundary
- City Boundary
- Quarter Mile Review Area
- Ohio USGS 7.5' Topographic Quadrangle

N

0 1,000 2,000

Feet

AMERICAN ELECTRIC POWER

Kiber Station Project

FIGURE 2
AERIAL PROJECT OVERVIEW

DATE: 11/7/2023	1 INCH = 1,000 FEET
CREATED BY: JL	CHECKED BY:
JOB NO.: 60716171	AECOM

Date Saved: 11/7/2023
Document Path: X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60716171_Kiber_Station\2_MXDs\0_TE\Kiber_Station_ODNRFigure2_Aerial_Overview.mxd

APPENDIX F

AGENCY RESPONSE LETTERS

Office of Real Estate
Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, Ohio 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

January 12, 2024

Bridgette Glass
AECOM
707 Grant Street, 5th Floor
Pittsburgh, Pennsylvania 15219

Re: 23-1458_Kiber Station

Project: The proposed project involves the construction of a new greenfield substation (approximately 10-acre or less) as per a customer request.

Location: The proposed project is located in Monroe Township, Licking 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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

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

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

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

December 1, 2023

Project Code: 2024-0017970

Dear Bridgette Glass:

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

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

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

Sincerely,

Scott Hicks

Scott Hicks
Acting Field Office Supervisor

Appendix E Ecological Survey Report – Kiber 138 kV Extensions

KIBER EXTENSION EAST AND WEST 138KV TRANSMISSION LINE

LICKING COUNTY, OHIO

ECOLOGICAL REPORT

Prepared for:
American Electric Power Ohio Transmission Company
8500 Smiths Mill Road
New Albany, Ohio 43054

Prepared by:

525 Vine Street, Suite 1900
Cincinnati, Ohio 45202

Project #s: 60716177 & 60716183

May 2025

TABLE OF CONTENTS

TABLES (in-text)

FIGURES

Number

APPENDICES

Number

1.0 INTRODUCTION

American Electric Power Ohio Transmission Company (AEP Ohio Transco) is proposing to install 0.25-mile, double circuit, greenfield 138kV transmission line between the proposed Kiber Station and cut-into the existing Green Chapel Extension 138kV transmission line as part of the Kiber Extension East and West 138kV Transmission Line Project (Project) located in Licking County, Ohio (OH).The Project Survey Area associated with this Ecological Report is located within the Johnstown and Jersey, OH, United States Geological Survey (USGS) 7.5-minute topographical quadrangles as displayed on the Project Location Map (**Figure 1**).

The purpose of the field survey was to assess the presence of wetlands and possible "waters of the United States" (WOTUS) that occur within the proposed Project area. Secondarily, land uses were also recorded to classify and characterize potential habitat for threatened, and endangered species. This report will be used to assist AEP Ohio Transco's efforts to identify potential WOTUS and threatened and endangered species habitat present within the proposed Project area to avoid or minimize impacts during construction activities.

2.0 METHODOLOGY

The field survey was completed within the Project Survey Area totaling approximately 21.8 acres. Prior to conducting field surveys, digital United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey data, United States Fish and Wildlife Service (USFWS), National Wetlands Inventory (NWI) data, USGS National Hydrography Dataset (NHD), Federal Emergency Management Agency (FEMA) 100-year floodplain data, and USGS 7.5-minute topographic maps were reviewed to identify the occurrence and location of potential wetland areas and/or streams.

Field survey activities included recording the physical boundaries of observed water features using sub-meter capable Global Positioning System (GPS) units in conjunction with the ArcGIS Field Maps application on tablets. The GPS data was imported into ArcMap Geographic Information System (GIS) software, where the data was reviewed, edited for accuracy, and compiled in a format suitable for transfer and use by AEP Ohio Transco. Water features were delineated and assessed based upon the appropriate procedures detailed below. Land uses observed within the Project Survey Area were assigned a general classification based upon the principal land characteristics and vegetative cover of the location.

2.1 WETLAND DELINEATION

The Project Survey Area was evaluated according to the procedures outlined in the United States Army Corps of Engineers (USACE) *Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory, 1987) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)* (USACE, 2010).

During field survey activities AECOM utilized the routine on-site delineation method described in the *1987 Manual* and *Regional Supplement* that consisted of a pedestrian site reconnaissance, including identifying the vegetative communities, soils identification, a geomorphologic assessment of hydrology, and notation of disturbance. If a wetland was identified, AECOM completed a USACE Wetland Determination Data Form (USACE Data Form) within each unique wetland habitat to serve as a representative of the wetland hydrology, vegetative community, and soil characteristics. Adjacent to each wetland complex, AECOM completed an additional USACE Data Form as a representative of the upland community.

2.1.1 WETLAND CLASSIFICATION

Wetlands identified in the field were classified based on the naming convention found in *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin *et al.*, 1979). The unique wetland habitats were classified as palustrine emergent (PEM), palustrine forested (PFO), palustrine unconsolidated bottom (PUB), palustrine scrub-shrub (PSS), or other classifications for some wetlands. Multiple Cowardin classifications may be present where more than one classification's vegetation is dominant (vegetation type covers 30 percent or more of the substrate). Where multiple Cowardin classifications are present, the Cowardin classification of the plants that constitute the uppermost layer of vegetation having 30% or greater coverage is used for the classification.

2.1.2 WETLAND ASSESSMENT

Each delineated wetland was assessed following the Ohio Environmental Protection Agency (OEPA) *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) (Mack, 2001). Wetland assessments utilized the 10-page ORAM form, providing a final Category rating for each wetland. Wetlands are rated as either a Category 1, Category 2, or Category 3 wetland, with the former being the least pristine and the latter being the most pristine.

2.2 STREAM ASSESSMENT

Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high-water mark (OHWM). The USACE defines the OHWM as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas" (USACE, 2005).

2.2.1 OEPA PRIMARY HEADWATER HABITAT ASSESSMENT

Stream assessments were conducted using the methods described in the OEPA's *Methods for Assessing Habitat in Flowing Waters*: *Using OEPA's Qualitative Habitat Evaluation Index (QHEI)* (Rankin, 2006) and in the OEPA's *Field Methods for Evaluating Primary Headwater Streams in Ohio* (OEPA, 2020). Streams

associated with watershed area less than or equal to 1.0 square mile (259 hectares), and a maximum depth of water pools equal to or less than 15.75 inches were evaluated utilizing the Headwater Habitat Evaluation Index (HHEI) methodology and all other streams assessed using the QHEI methodology. Flow regime (ephemeral, intermittent, perennial) was determined by the appropriate stream assessment score per OEPA manuals (OEPA, 2020) and by AECOM's professional opinion.

Streams assessed in the Project Survey Area were reviewed for existing OEPA Aquatic Life Use Designations per OEPA's Water Quality Standards (OAC Chapter 3745-1). Those without an existing use designation were assigned a provisional aquatic life use designation based upon habitat assessment results (Rankin, 1989; OEPA, 2020).

2.2.2 OEPA 401 WATER QUALITY CERTIFICATION FOR NATIONWIDE PERMIT ELIGIBILITY

The OEPA has designated each watershed in the state on based on whether it may be ineligible for coverage under the OEPA's 401 Water Quality Certification (WQC) for Nationwide Permits (NWPs) (OEPA, 2023). Mapping provided by the OEPA illustrates the eligibility of streams in the area to fall under an NWP for 401 certification or if an individual state WQC needs to be applied for. Impacts to streams within each watershed would then have eligibility for 401 WQC determined by the watershed category. The three categories are defined as:

Eligible: Streams within the watershed are eligible for coverage under the OEPA's water quality certification for the Nationwide Permits if all other general and regional special terms and conditions are met.

Ineligible: Projects affecting high quality streams and undesignated streams draining directly to high quality streams, as represented in the map, must undergo an individual 401 WQC review process.

Possibly Eligible: Additional field screening procedures are required for streams in the watershed to determine appropriate eligibility. Projects affecting undesignated streams within those HUC12 watersheds that do not directly but eventually drain into high quality waters, might be eligible for coverage under the OEPA's 401 WQC for NWPs depending on the results of a field screening assessment. The procedures for determining individual stream eligibility in this scenario are specified in Appendix C "Stream Eligibility Determination Process" of the OEPA Ohio State Water Quality Certification of the 2017 Nationwide Permit Reauthorization (OEPA, 2017).

2.2.3 UPLAND DRAINAGE FEATURES

An upland drainage feature (UDF) is a non-jurisdictional drainage that does not meet the criteria of either a jurisdictional stream or a wetland. A UDF generally lacks an OHWM (USACE, 2005) and are equivalent to a swale or an erosional feature as described by the USACE: "generally shallow features in the landscape that may convey water across upland areas during and following storm events. Swales usually occur on

nearly flat slopes and typically have grass or other low-lying vegetation throughout the swale" (USACE, 2005).

A roadside ditch may also be documented as a UDF if it meets the "not potentially jurisdictional" characterization as described in the Office of Environmental Services *Roadway Ditch Characterization Flowchart* (Ohio Department of Transportation, 2014). This would include a ditch that originates entirely within the roadway right-of-way, has a seasonal flow regime, was not constructed to drain a wetland, and does not have hydrophytic vegetation extending more than an insignificant amount beyond its original configuration.

In addition, UDF's (including swales, ditches, and other erosional features) are generally not WOTUS except in certain circumstances, such as relocated streams.

2.3 RARE, THREATENED, AND ENDANGERED SPECIES

AECOM conducted a threatened and endangered species review and general field habitat surveys within the Project Survey Area. AECOM submitted requests to the Ohio Department of Natural Resources (ODNR) Office of Real Estate – Environmental Review Section and the USFWS Ohio Ecological Services Field Office soliciting comments on the proposed Project. Agency-identified species of concern and available species-specific information was reviewed to identify the various habitat types that listed species are known to inhabit.

AECOM field ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys as part of assessing potential impacts to threatened and endangered species. Land uses within the Project Survey Area were assigned a general classification based upon the principal land characteristics and vegetative cover as observed during the field surveys.

AECOM conducted a desktop assessment of the Project Survey Area and a quarter-mile buffer around it to identify potentially occurring winter bat hibernaculum that may be present near the Project which is in **Appendix A**. This assessment was conducted by reviewing data on mining activity and karst geology from the ODNR Division of Mineral Resources and USGS websites.

3.0 RESULTS

AECOM ecologists walked the Project Survey Area to conduct the wetland delineation, stream assessment and habitat survey on January 28, 2025. Within the Project Survey Area, AECOM delineated two streams and five upland drainage features. The representative data forms as well as photo documentation are provided as **Appendices C and D.**

3.1 WETLAND DELINEATION

3.1.1 PRELIMINARY SOILS EVALUATION

According to the USDA/NRCS Web Soil Survey, three soil map units are mapped within the Project Survey Area (USDA NRCS, 2023a and 2023b). Of these, one was identified as hydric soil, and two were identified as containing hydric inclusions. Soils indicated as hydric inclusions are not predominately hydric soils and hydric soils are more likely to be found in topographic settings. **Table 1** below provides a detailed overview of all soil series and soil map units present within the Project Survey Area. Soil map units located in the Project Survey Area and vicinity are shown on **Figure 2**.

TABLE 1 - SOIL MAP UNITS AND DESCRIPTIONS WITHIN THE PROJECT SURVEY AREA

Soil Series	Map Unit Symbol	Map Unit Description	Topographic Setting	Hydric	Hydric Component (%)
Bennington	BeA	Bennington silt loam, 0 to 2 percent slopes	Ground moraines, end moraines	Yes*	Condit 5%, Pewamo – Low carbonate till 3%
	BeB	Bennington silt loam, 2 to 6 percent slopes	End moraines, ground moraines	Yes*	Condit 3%, Pewamo – Low Carbonate till 3%
Pewamo	Pe	Pewamo silty clay loam, low carbonate till, 0 to 2 percent slopes	Drainageways, depressions	Yes	Pewamo-Low carbonate till 85%, Condit 9%

Yes* = Hydric inclusion present

3.1.2 NATIONAL WETLANDS INVENTORY MAP REVIEW

According to NWI data covering the Project location, the Project Survey Area contains one Riverine, Unknown Perennial, Unconsolidated Bottom, Permanently Flooded (R5UBH) wetland. The feature was field verified as S-AGS-001, a named perennial stream (Duncan Run) that continues outside of the Project Survey Area. The locations of the NWI mapped wetlands in the Project vicinity are shown on **Figure 2**.

3.1.3 DELINEATED WETLANDS

During the field surveys, no wetlands were identified within the Project Survey Area (**Figure 3**).

One upland data point was taken in order to document the absence of wetlands. The location of this data point are shown on **Figure 3**. The completed USACE Data Form and photographs from the upland data point are provided in **Appendix B.**

3.2 STREAM DELINEATION

During the field survey, AECOM identified one perennial stream and one ephemeral stream within the Project Survey Area (**Figure 3**). Of these delineated streams, one stream (S-AGS-002) was classified using HHEI evaluations that identified the stream as a Modified Class I PHW. The second stream (S-AGS-001), named as Duncan Run, has an existing OEPA Aquatic Life Use Designation of Warmwater Habitat (WWH) under Ohio Revised Code (ORC) Chapter 3745-1, which takes precedence over any HHEI or QHEI evaluations.

AECOM has provided a provisional determination that all delineated streams within the Project Survey Area appear to be jurisdictional (i.e., WOTUS), based on their observed or presumed confluence with downstream waters. Final jurisdictional status can only be determined by the USACE, and AECOM assessments are provisional. A summary of the delineated features is provided in **Table 2**. Dataforms and photographs of the delineated stream resources are provided in **Appendix C.**

TABLE 2 – SUMMARY OF DELINEATED STREAMS WITHIN THE PROJECT SURVEY AREA

Stream ID	Location		Stream Type	Stream Name	Delineated Length (feet)	Bankfull Width (feet)	OHWM Width (feet)	Field Evaluation			Ohio EPA 401 Eligibility	Stream Crossing?	Proposed Impacts	
	Latitude	Longitude						Method	Score	Category / Rating / OAC Designation			Fill Type	Area (acre)
S-AGS-001	40.12460	-82.72934	Perennial	Duncan Run	536	11	7	Chapter 3745-1	N/A	WWH	Eligible	TBD	TBD	TBD
S-AGS-002	40.12455	-82.72924	Ephemeral	UNT to Duncan Run	28	4	3	HHEI	23	Modified Class I PHW	Eligible	TBD	TBD	TBD
Total:					**564**									**TBD**

3.2.1 OEPA STREAM ELIGIBILITY

OEPA stream eligibility for 401 WQC mapping was reviewed for the Project Survey Area. The Project occurs across two watersheds, designated by 401 WQC eligibility, as listed in **Table 3**. OEPA stream eligibility mapping for the Project vicinity, is provided on **Figure 4**.

TABLE 3– SUMMARY OF WATERSHED 401 WQC ELIGIBILITY WITHIN THE PROJECT SURVEY AREA

HUC-12	Watershed	401 WQC Eligibility	Number of Stream Assessments
050400060301	Headwaters Raccoon Creek	Eligible	0
050600011307	Duncan Run	Eligible	2
		Total	**2**

3.3 FEMA 100 YEAR FLOODPLAINS

Mapped FEMA designated 100-year floodplains and floodways are displayed on **Figure 2** and **Figure 3**. One regulated FEMA 100-year floodplain and/or floodway is located within the Project Survey Area effective July 31, 2024 (39089C0280J) (FEMA, 2024). The mapped 100-year floodplain within the Project Survey Area is located between Structures 17 and 18, as displayed on **Figure 2** and **Figure 3**.

3.4 PONDS

During the field survey, AECOM did not identify any ponds within the Project Survey Area.

3.5 UPLAND DRAINAGE FEATURES

During the field survey, AECOM identified five upland drainage features within the Project Survey Area. The extent of the upland drainage features are displayed on **Figures 2** and **3.** Photographs of all delineated upland drainage features are provided in **Appendix D**.

3.6 VEGETATIVE COMMUNITIES

AECOM ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys. As described in **Table 4** below, the Project Survey Area contains landscaped, old field, streams/wetlands, urban, agricultural row-crop, and woodland areas. Habitat descriptions applicable to the Project are provided below. Vegetative communities are depicted visually on aerial photography in **Figure 5**. Representative photographs of the vegetative communities in the Project Survey Area are provided as **Appendix E**.

TABLE 4 - VEGETATIVE COMMUNITIES WITHIN THE PROJECT SURVEY AREA

Vegetative Community	Description	Approximate Acreage Within the Project Survey Area	Approximate Percentage Within the Project Survey Area
Landscaped	Landscaped areas, including residential properties and commercial properties, and are frequently mowed and maintained, comprised of grasses and forbs.	5.7	26
Agricultural Row-Crop	Agricultural lands being utilized for row-crop production and associated activities, typically devoid of vegetation outside of the target crop and opportunistic/invasive species.	10.8	50
Old Field	Herbaceous cover exists alongside roads, field borders, and abandoned fields within the survey area of the Project in the form of successional old-field communities. These communities are the earliest stages of recolonization by plants following disturbance. This community type is typically short-lived, giving way progressively to shrub and forest communities unless periodically re-disturbed, in which case they remain as old fields. The old-field areas within the study corridors and adjacent areas are infrequently mowed areas of grasses, forbs, and occasional shrubs.	3.5	16
Streams/Wetlands	Wetlands were observed within the survey area for the Project	0.2	1
Urban	Urban areas are areas developed with residential and commercial land uses, including roads, buildings and parking lots. These areas are generally devoid of significant woody and herbaceous vegetation.	0.8	4
Woodlands	Woodlands (floodplain, upland, successional-mixed, etc.) are present along the Project Survey Area.	0.7	3
	Totals:	**21.8**	**100%**

3.7 RARE, THREATENED AND ENDANGERED SPECIES AGENCY COORDINATION

Protected Species Agency Consultation –

On February 28, 2025, coordination letters were sent to USFWS and the ODNR Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review for potential impacts to threatened and endangered species within the Project Survey Area. Responses were received from the USFWS on March 13, 2025, and from the ODNR on March 27, 2025.

According to a response letter received from the USFWS, two federally endangered and one federally proposed bat species were identified within range of the Project area. Regarding state threatened and endangered species that may occur within the Project vicinity, eight species were listed by the ODNR.

Correspondence letters from the USFWS and ODNR for Kiber Extension East and West 138kV Transmission Line Project are included as **Appendix F**. **Table 5** provides a list of species of concern

identified by the agencies as potentially occurring within the vicinity of the Project. Photographs of the habitat within the Project Survey Area are provided as **Appendix E**.

TABLE 5 – ONDR AND USFWS LISTED SPECIES WITHIN THE PROJECT SUVEY AREA

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Mammals							
Indiana Bat (*Myotis sodalis*)	Endangered	Endangered	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat **Yes** – Within the Project Survey area, trees were identified along Duncan Run that may provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project area and seasonal tree clearing, between October 1 and March 31, is recommended. Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.
Northern Long-eared Bat (*Myotis septentrionalis*)	Endangered	Endangered	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat **Yes** – Within the Project Survey area, trees were identified along Duncan Run that may provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Additionally, the ODNR indicated that there is a known presence of this species within the Project area and summer surveys would not constitute a presence or absence of this species. Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project area and seasonal tree clearing, between October 1 and March 31, is recommended. Additional summer surveys would not constitute presence/absence within the Project area for the northern long-eared bat. Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.
Little brown bat (*Myotis lucifugus*)	Endangered	NA	Summer habitat During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. Hibernaculum(a) During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	Summer habitat **Yes** – Within the Project Survey area, trees were identified along Duncan Run that may provide suitable habitat for the species. Hibernaculum(a) No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	Summer habitat ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). Hibernaculum(a) The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	Summer habitat Potential summer roosting habitat is present within the Project area and seasonal tree clearing, between October 1 and March 31, is recommended. . Hibernaculum(a) No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.

Common Name (Scientific Name)	State Status	Federal Status	Typical Habitat	Habitat Observed	Avoidance Dates	Agency Comments	Potential Impacts
Tricolored bat (*Perimyotis subflavus*)	Endangered	Proposed	<u>Summer habitat</u> During spring/summer, this bat species roost in trees behind loose, exfoliating bark, in crevices and cavities, or in leaves. <u>Hibernaculum(a)</u> During winter, this species hibernates in humid mines, caves, and occasionally man-made structures.	<u>Summer habitat</u> **Yes** – Within the Project Survey area, trees were identified along Duncan Run that may provide suitable habitat for the species. <u>Hibernaculum(a)</u> No mine openings and/or known caves are located within 0.25 miles of Project area and USFWS did not identify known hibernacula within 5 miles of the Project. Field evaluations did not identify any potential hibernaculum(a) within the Project area (2024 Joint Guidance)*.	April 1 – September 30	<u>Summer habitat</u> ODNR and USFWS recommends adherence to Avoidance Dates for Tree Clearing Activities (April 1 – September 30). <u>Hibernaculum(a)</u> The ODNR DOW recommends a desktop habitat assessment to be conducted to identify potential hibernacula within 0.25 miles of the Project area. If habitat assessment finds potential hibernaculum within 0.25 miles, a revised seasonal tree clearing restriction (March 15 to November 15) is recommended (2024 Joint Guidance)*. If absence or no tree cutting or subsurface impacts are proposed, the Project is not likely to impact this species.	<u>Summer habitat</u> Potential summer roosting habitat is present within the Project area and seasonal tree clearing, between October 1 and March 31, is recommended. <u>Hibernaculum(a)</u> No impacts to winter hibernacula were identified due to absence of caves, mines, or portals within 0.25 miles of the Project.
Fish							
Lake Chubsucker (*Erimyzon sucetta*)	Threatened	None	Perennial Streams	**Yes**, streams are present, but no in-water work is proposed.	N/A	Due to the location, and that there is no in-water work proposed in a perennial stream, this Project is not likely to impact this species.	No
Reptiles							
Eastern massasauga (*Sistrurus catenatus*)	Endangered	Threatened	The species uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat.	**No** – The Project Survey Area is situated within a rural residential landscape and consists primarily of agriculture row-crop and landscaped areas.	N/A	Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.	No
Birds							
Northern Harrier (*Circus hudsonius*)	Endangered	None	This species hunts over grasslands and nests can be found in large marshes and grasslands.	**No** – Based on desktop and field reviews, the Project Survey Area is situated within a rural residential landscape and consists primarily of agricultural row-crop and landscaped areas.	April 15 to July 31	Habitat should be avoided during the bird's nesting period between April 15 through July 31. If habitat will not be impacted, this Project will not likely impact the species.	No
Sandhill Crane (*Antigo canadensis***)**	Threatened	None	This species utilizes areas of large, expansive wetlands, wet meadows, shallow marshes, and bogs.	**No** – Based on desktop and field reviews, the Project Survey Area is situated within a rural residential landscape and consists primarily of agricultural row-crop and landscaped areas. No potential suitable habitat was observed for this species.	N/A	ODNR stated that if grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period April 15 through July 31.	No potentially suitable habitat was observed with the Project Survey Area.

Protected Species Agency Summary –

Based on general observations during the ecological field survey, woodland areas were identified within the Project Survey Area at the western end, along Duncan Run. If tree clearing were to become part of the Project scope of work, the ODNR recommends implementations of seasonal tree clearing between October 1 and March 31 to avoid adverse effects to Indiana bat, northern long-eared bat, little brown bat, and tricolored bat. ODNR confirmed a known presence in the vicinity of the Project area for the northern long-eared bat and additional summer surveys would not constitute presence/absence within the Project Survey Area. If summer tree clearing is needed, additional coordination will be completed with the ODNR.

AECOM completed a desktop review for potential hibernaculum in accordance with the 2024 Ohio ODNR DOW and the USFWS Joint Guidance for Bat Surveys and Tree Clearing within 0.25 miles of the Project Survey Area, and no caves, mines, and/or karst features were identified. As per ODNR guidance, further coordination regarding potential hibernaculum is only necessary if the habitat assessment finds potential habitat within 0.25 miles of the Project Survey Area. Therefore, no further coordination is necessary with either the ODNR and/or the USFWS regarding the listed bat species. Results of the desktop habitat assessment are included in **Appendix A**.

No impacts are anticipated to occur to the fish species listed in **Table 5**, as no in-water work is proposed as part of the Project.

The ODNR noted that the Project is within the range of the northern harrier; however, AECOM ecologist and approved avian specialist concluded an absence of this species' nesting habitat within the Project Survey Area. According to ODNR, open grasslands and wet meadow marshes, of at least 2-acres, is considered nesting habitat for the northern harrier. Based on field and desktop review, the Project Survey Area is situated primarily within a rural, agricultural area with interspersed private residences. While suitable landcover (old field habitat) is present, the area is situated amongst a residential landscape and thus excludes it from the consideration of potential habitat due to edge effect and potential for predation of the ground nesting birds. As there are no open grasslands, wet meadow marshes, or large, expansive fields of suitable landcover that would meet the ODNR requirement for size (>2-acres); there is no suitable nesting habitat within the Project Survey Area. No further coordination regarding this listed species is warranted for this Project.

The ODNR provided guidance that sandhill cranes are a wetland-dependent species that utilize shallow, standing water or moist bottomlands for roosting. For breeding, they require a large tract of wet meadow, shallow marsh, or bog. Any construction that could impact these areas should be avoided through the birds' nesting period of April 1 through August 31. The Project Survey Area is comprised primarily of agricultural row-crop, landscaped and old field vegetative communities, with an ephemeral and perennial stream. Due to the lack of any marsh habitat, moist bottomlands, or wet meadows, no suitable roosting or nesting habitat

for the sandhill crane was identified within the Project Survey Area. Due to the absence of habitat within the Project Survey Area, no further coordination with the ODNR is warranted.

The Project was within range of the eastern massasauga but due to the location, the type of habitat within the project area, and the type of work proposed, that this Project is not likely to impact this species. No further coordination is warranted with the ODNR regarding this species.

4.0 SUMMARY

The ecological survey of the Project Survey Area identified no wetlands or ponds, two streams and five upland drainage features. The representative upland data forms and photo documentation are provided in **Appendix B,** stream photographs and data are in **Appendix C**, and UDF photos are within **Appendix D.**

The reported results of the ecological survey conducted by AECOM on this Project are limited to the areas within the Project Survey Area provided in **Figure 3**. Areas that fall outside of the Project Survey Area were not evaluated in the field and not included in the reporting of the survey.

Of the eight state and/or federally listed threatened and endangered species within range of the Project Survey Area, no habitat for any of the listed fish, reptile, or bird species were identified within the Project Survey Area. If tree clearing activities are required, the ODNR recommends tree clearing be completed between October 1 and March 31. If summer tree clearing is required, further coordination is anticipated to be required with the ODNR. Habitat photographs are provided in **Appendix E.**

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

5.0 REFERENCES

Cowardin, L.M., V. Carter, F.C. Golet and E.T. LaRoe. 1979. *Classification of Wetlands and Deepwater Habitats of the United States.* Office of Biological Services, U.S. Fish and Wildlife Service, Washington, D.C.

Environmental Laboratory. 1987. *United States. Corps of Engineers Wetlands Delineation Manual.* Technical Report Y-87-1, U.S. Army Engineer Waterways Experiment Station: Vicksburg, Mississippi.

Federal Emergency Management Agency. 2024. National Flood Hazard Layer, Licking County, Ohio. https://msc.fema.gov/portal. Published July 31, 2024.

Mack, John J. 2001. *Ohio Rapid Assessment Method for Wetlands v. 5.0, User's Manual and Scoring Forms. OEPA Technical Report WET/2001-1*. Ohio Environmental Protection Agency, Division of Surface Water, 401/Wetland Ecology Unit, Columbus, Ohio.

Ohio Department of Transportation. 2014. Roadway Ditch Characterization Flowchart. From: Ecological Manual, April 2014. Office of Environmental Services.

Ohio Division of Wildlife and United States Fish and Wildlife Service (USFWS) (OH-Field Office). 2024. Joint Guidance for Bat Surveys and Tree Clearing. Published May 2024.

Ohio Environmental Protection Agency (OEPA). 2017. Section 401 Water Quality Certification for the 2017 Nationwide Permits. Appendix C Stream Eligibility Determination Process. Effective March 17, 2017. Ohio Environmental Protection Agency, Division of Surface Water, 401 Water Quality Certification and Isolated Wetland Permitting Section, Columbus, Ohio.

OEPA. 2024. 401 Water Quality Certification for the Nationwide Permits Stream Eligibility Web Map (Updated January 24, 2024). https://data-oepa.opendata.arcgis.com/datasets/401-water-quality-certification-for-nationwide-permits

OEPA. 2020. *Field Methods for Evaluating Primary Headwater Streams in Ohio*. Version 4.1. Ohio EPA Division of Surface Water, Columbus, Ohio. May 2020. 130 pp.

Rankin, Edward T. 1989. *The Qualitative Habitat Evaluation Index (QHEI*): *Rationale, Methods, and Application*. Ohio EPA Ecological Assessment Section, Division of Surface Water, Columbus, Ohio.

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

United States Army Corps of Engineers (USACE). 2005. Regulatory Guidance Letter No. 05-05: Guidance on Ordinary High Water Mark Identification.

USACE. 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest (Version 2.0)*, ed. J. S. Wakeley, R. W. Lichvar, J. F. Berkowitz, and C. V. Noble. ERDC/EL TR-10-16. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

USACE. 2020. *National Wetland Plant List*, version 3.5. Engineer Research and Development Center. Cold Regions Research and Engineering Laboratory, Hanover, NH. http://wetland_plants.usace.army.mil/

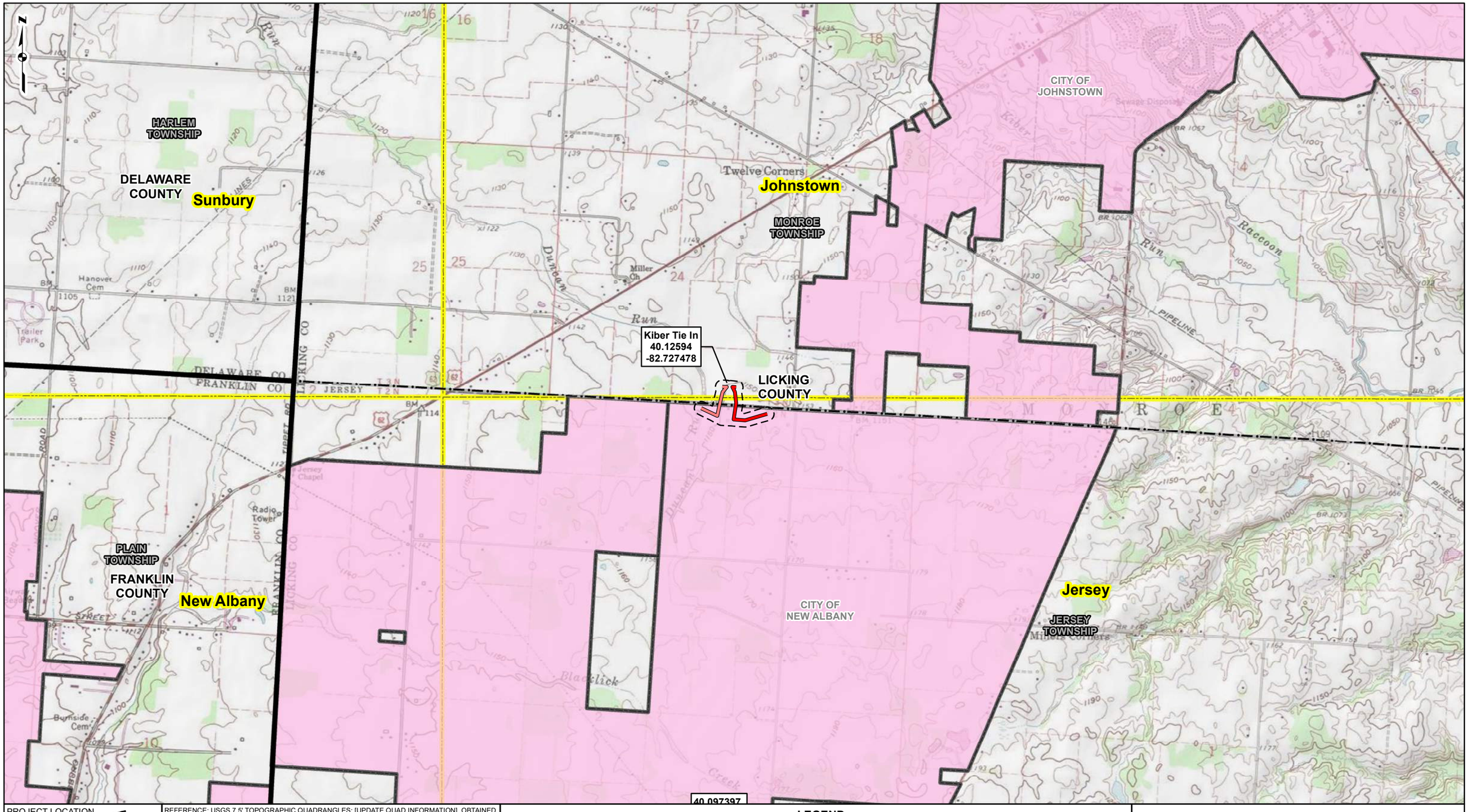
United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). 2025a. National Hydric Soils List. http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/use/hydric/. Accessed May 2025.

USDA, NRCS. 2025b. Web Soil Survey (GIS Shapefile). http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. Accessed May 2025.

USFWS. 2023. National Wetlands Inventory Geodatabase for Ohio. Available online at http://www.fws.gov/wetlands/Data/Mapper.html. Accessed May 2025.

United States Geological Survey. 2016. National Hydrography Dataset, Ohio Statewide Geodatabase. Published August 2016. Earth Science Information Center, USGS, Reston, VA.

FIGURES



PROJECT LOCATION

LICKING COUNTY, OHIO

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: [UPDATE QUAD INFORMATION], OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 03/2025.

3/26/2025

LEGEND

- KIBER EXTENSION EAST TIE-IN 138KV
- KIBER EXTENSION WEST TIE-IN 138KV
- PROJECT SURVEY AREA
- MUNICIPAL BOUNDARIES (LEGEND ONLY) (40%T)
- TOWNSHIP BOUNDARIES
- COUNTY BOUNDARIES
- OHIO USGS 7.5' TOPOGRAPHIC QUADRANGLE

0 1,000 2,000 4,000 Feet

FIGURE 1
PROJECT LOCATION MAP

KIBER EXTENSION EAST AND
KIBER EXTENSION WEST TIE-INS 138KV PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: GIB DATE: 3/26/2025
CHECKED: CJT APPROVED:

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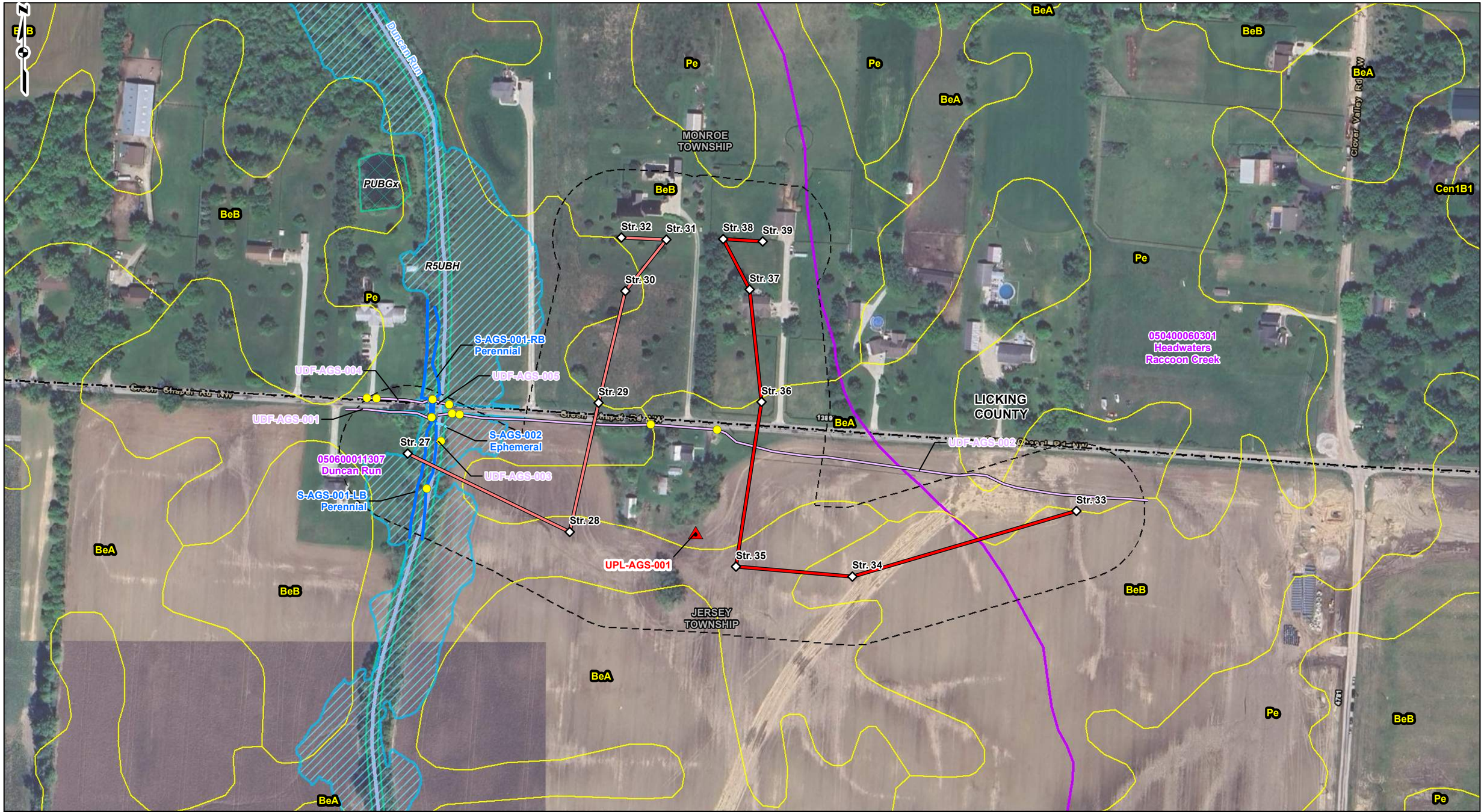

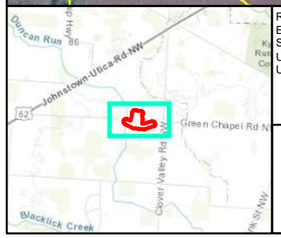

REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 05/2025. SOIL SURVEY GEOGRAPHIC (SSURGO), USDA/NRCS, 2024. NHD, USGS 2024. NWI, USFWS 2024. HUC 12, USGS 2024.

5/5/2025

LEGEND

- PROPOSED STRUCTURE
- UPLAND DATA POINT
- CULVERTS
- KIBER EXTENSION EAST TIE-IN 138KV
- KIBER EXTENSION WEST TIE-IN 138KV
- DELINEATED UPLAND DRAINAGE FEATURE
- PROJECT SURVEY AREA
- DELINEATED EPHEMERAL STREAM
- DELINEATED PERENNIAL STREAM
- DELINEATED PEM WETLAND
- NHD STREAM (USGS)
- NWI WETLAND (USFWS)
- HUC 12 WATERSHED BOUNDARY
- 100-YEAR FEMA FLOODPLAIN
- SOIL MAP UNIT
  - BeA: BENNINGTON SILT LOAM, 0 TO 2 PERCENT SLOPES
  - BeB: BENNINGTON SILT LOAM, 2 TO 6 PERCENT SLOPES
  - PEWAMO SILTY CLAY LOAM, LOW CARBONATE TILL, 0 TO 2 PERCENT SLOPES

0 100 200 400 Feet

FIGURE 2
SOIL MAP AND NATIONAL WETLANDS INVENTORY MAP

AECOM

KIBER EXTENSION EAST AND
KIBER EXTENSION WEST TIE-INS 138KV PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: GIB
CHECKED: CJT
DATE: 5/5/2025
APPROVED:

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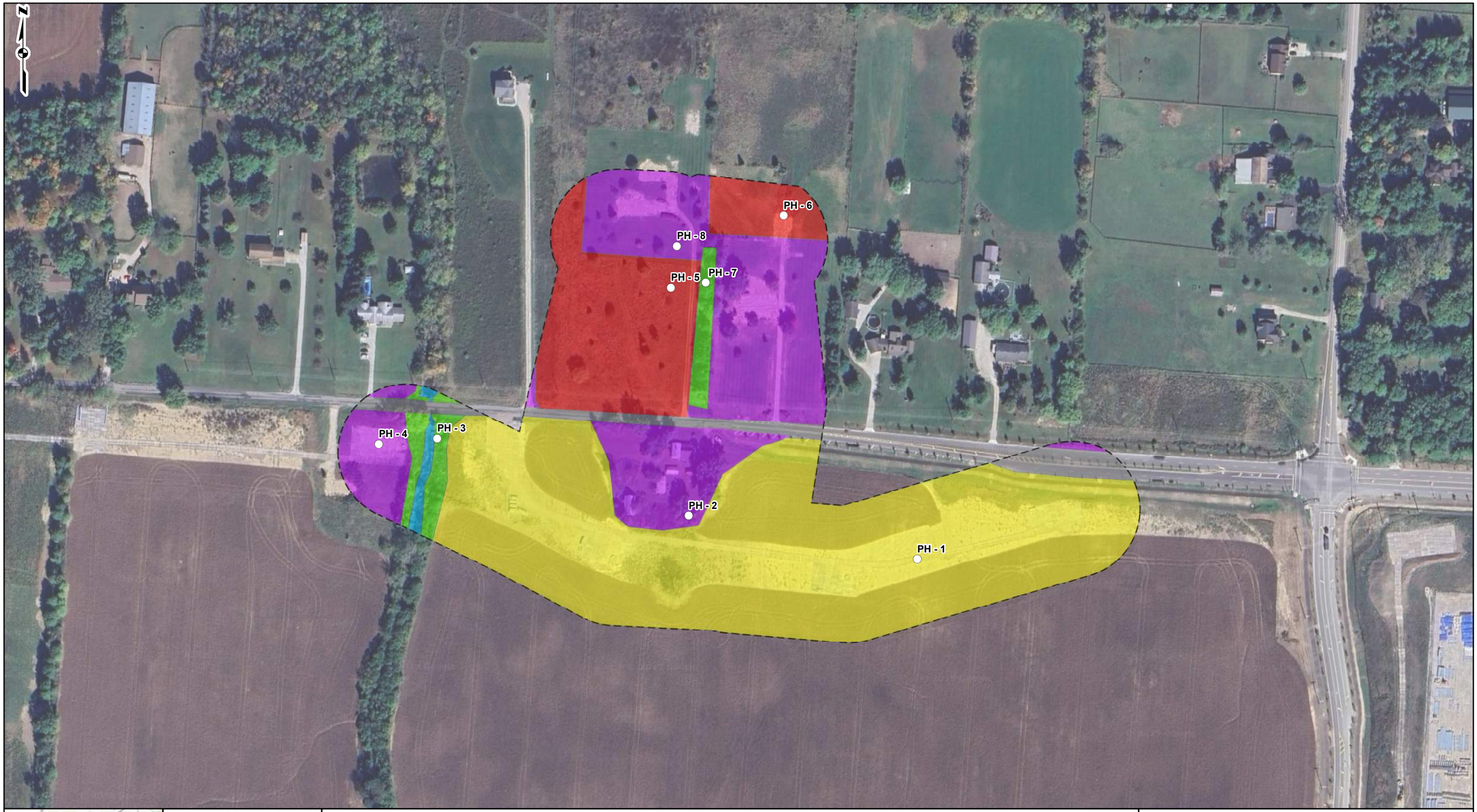

REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 03/2025.

3/26/2025

LEGEND

PHOTO LOCATION POINT

PROJECT SURVEY AREA

VEGETATIVE COMMUNITY TYPE

AGRICULTURE ROW-CROP

LANDSCAPED

OLD FIELD

STREAMS/WETLANDS

URBAN

WOODLANDS

0 100 200 400 Feet

FIGURE 5
VEGETATIVE COMMUNITIES
ASSESSMENT MAP

AECOM

KIBER EXTENSION EAST AND
KIBER EXTENSION WEST TIE-INS 138KV PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: GIB DATE: 3/26/2025

CHECKED: CJT APPROVED:

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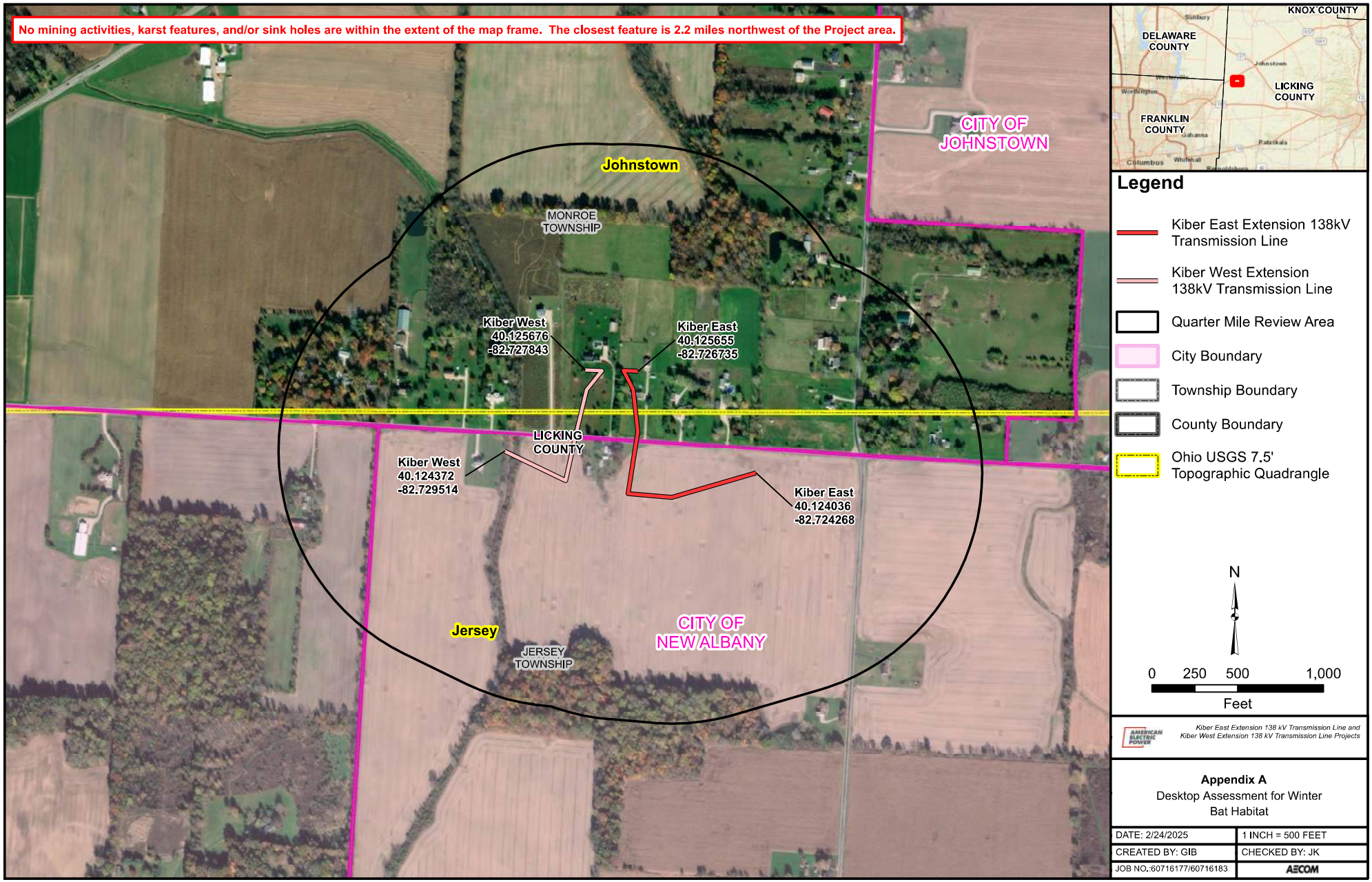
APPENDIX A

DESKTOP ASSESSMENT FOR WINTER BAT HABITAT



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APPENDIX F

AGENCY RESPONSE LETTERS

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

December 1, 2023

Project Code: 2024-0020555

Dear Bridgette Glass:

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

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

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

Sincerely,

Scott Hicks

Scott Hicks
Acting Field Office Supervisor

Office of Real Estate
Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, Ohio 43229
Phone: (614) 265-6661
Fax: (614) 267-4764

January 12, 2024

Bridgette Glass
AECOM
707 Grant Street, 5th Floor
Pittsburgh, Pennsylvania 15219

Re: 23-1461_Kiber Ext E Green Chapel-Kiber 138 kV and Kiber Ext W Fiesta-Kiber 138 kV

Project: The proposed project involves the installation of two separate 0.25-miles greenfield 138 kV routes connecting the new Kiber Station to the existing Green Chapel 138 kV transmission line and to the proposed Fiesta 138 kV transmission line.

Location: The proposed project is located in Jersey and Monroe townships, Licking 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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

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

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

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Case No(s). 25-1160-EL-BLN

Summary: Application LON for Kiber Station electronically filed by Hector Garcia-Santana on behalf of AEP Ohio Transmission Company, Inc..