Letter of Notification for the Kiber-Groves Corner 138 kV Transmission Line Project

An AEP Company

PUCO Case No. 25-1161-EL-BLN

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

Submitted by:
Ohio Power Company

December 18, 2025

LETTER OF NOTIFICATION

Ohio Power Company

Kiber-Groves Corner 138 kV Transmission Line Project

4906-6-05 Accelerated Application Requirements

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

4906-6-05(B) General Information

B(1) Project Description

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

The Company is proposing the Kiber-Groves Corner 138 kV Transmission Line Project (the "Project"), located in Monroe Township and the City of Johnstown, Licking County, Ohio. The Project involves construction of a new double-circuit, 1.2-mile long 138 kV transmission line to provide electricity to a local electric distribution provider. An affiliate of the Company also proposes constructing Kiber Station and two approximately 0.1-mile 138 kV transmission lines from the Green Chapel 138 kV Extension located to the south, which will all be filed with OPSB under separate cover (OPSB Case No. 25-1160-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 Item (1)(d)(ii) 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:*
>
> *d) Line(s) primarily needed to attract or meet the requirements of a specific customer or customers, as follows:*
>
> *ii. Any portion of the line is on property owned by someone other than the specific customer or applicant.*

The Project has been assigned Case No. 25-1161-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. To deliver power to Kiber Station, the Company's affiliate 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. Service to the customer owned station will be provided by an approximately 1.2-mile double circuit 138 kV transmission line, which is the subject of this application, 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 page 136 (Table FE-T9), 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 in an area rapidly 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 locations of Kiber Station the local distribution company's substation, and the Project corridor were set aside by development groups for their proposed purpose. The proposed transmission corridor 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 local distribution

company. The Project also represents the most suitable location and most appropriate solution for meeting the Company's, the local distribution provider's, and 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 September 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 map of the Johnstown and Jersey, Ohio. **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
052-172740-00.000	Easement	Yes
053-1761780-00.000	Easement	Yes
053-172800-00.000	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 transmission line is estimated to include the following:

Voltage: 138kV
Conductors: 1033.3 KCMIL ACSS "Curlew" 54/7 - 2 Circuits
Static Wire: (2) 144ct OPGW 0.646"Dia
Insulators: Polymer
ROW Width: 100 feet
Structure Type: Seven (7) double circuit, steel two-pole dead ends with Davit arm on middle Phase
Three (3), double circuit, Steel monopole with Davit Arms
One (1), single circuit, steel monopole vertical dead-end

B(9)(b) Electric and Magnetic Fields

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

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

B(9)(c) Project Cost

The estimated capital cost of the project.

The cost estimate for the Project, which is comprised of applicable tangible and capital costs, is approximately $12,500,000 using a Class 4 estimate. Per the Ohio retail tariff, the Customer is responsible for 40% of the cost of the Project. The remainder of the Project cost, pursuant to the PJM Open Access Transmission Tariff ("OATT"), will be recovered in the Company's Federal Energy

Regulatory Commission ("FERC") formula rate (Attachment H-14 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Ecological Impacts

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

B(10)(a) Land Use

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

The Project corridor crosses an area rapidly being redeveloped from residential and agricultural uses to commercial and industrial uses. An aerial photograph of the Project vicinity is provided as **Figure 2**. The Project is mapped within Monroe Township and the City of Johnstown in Licking County. The Project anticipates the need to clear approximately 0.5 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 Area has historically been characterized by agricultural land use with low density residential land uses dispersed throughout. The dominant agricultural use appears to have been row crops (i.e. soy beans and corn). However, the Project Area is rapidly changing with the development of several industrial facilities and data centers with former agricultural land currently fallow or under redevelopment.

Based on data received from the Licking County Auditor's office on December 2, 2025, one parcel crossed north of the proposed Kiber Station is registered in the agricultural district land program although this property has been sold to a developer and appears to be fallow. The former agricultural portion of the property will be spanned with no poles proposed in the former agricultural field. No Ohio Department of Agricultural easements were identified 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 Project in August 2025. Correspondence from the State Historic Preservation Office ("SHPO") was received in

September 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 January 2026
Notice Criteria	Federal Aviation Administration	Coordination is expected to be complete in January 2026
Road Use Maintenance Agreement	Licking County	Already in place for other projects by the Company in the area.
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete 10/20/2025, no additional work required.
Threatened and Endangered Species	United States Fish and Wildlife Service	Consultation complete 3/10/2025
Threatened and Endangered Species	Ohio Department of Natural Resources	Consultation complete 3/27/2025

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 March 10, 2025 and March 27, 2025, 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 and July 31 2025, and prepared an Ecological Survey Report, which is provided in **Appendix D**. The survey of the Project area identified seven wetlands, three streams, and three upland drainage features. The Project construction activities are not expected to result in discharge of fill in any of the delineated features. Streams and wetlands will either be avoided by aerially spanning or bridged (no work below the ordinary high water mark).

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.

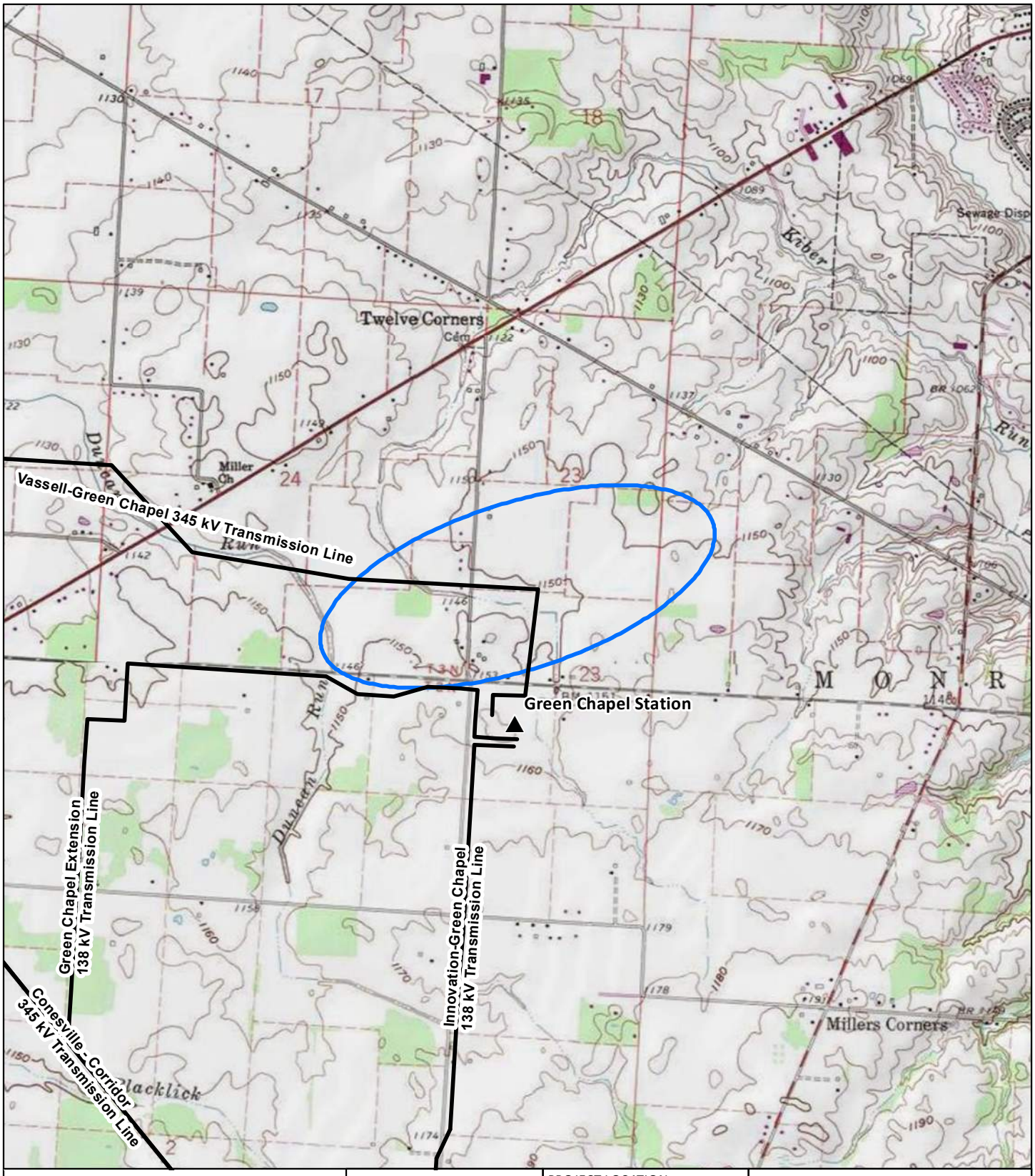
The FEMA Flood Insurance Rate Map ("FIRM") was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map numbers 39089C0140J, 39089C0139H). Based on this mapping, no FEMA-designated 100-year floodplains are crossed by the Project. Local floodplain permitting is unnecessary for the Project.

B(10)(g) Unusual Conditions

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

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

Appendix A Project Maps



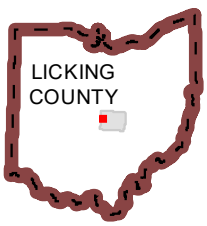
Project
Existing Station
Existing Transmission

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

Ohio State Plane South NAD 1983

December 02, 2025

PROJECT LOCATION



LICKING COUNTY, OHIO

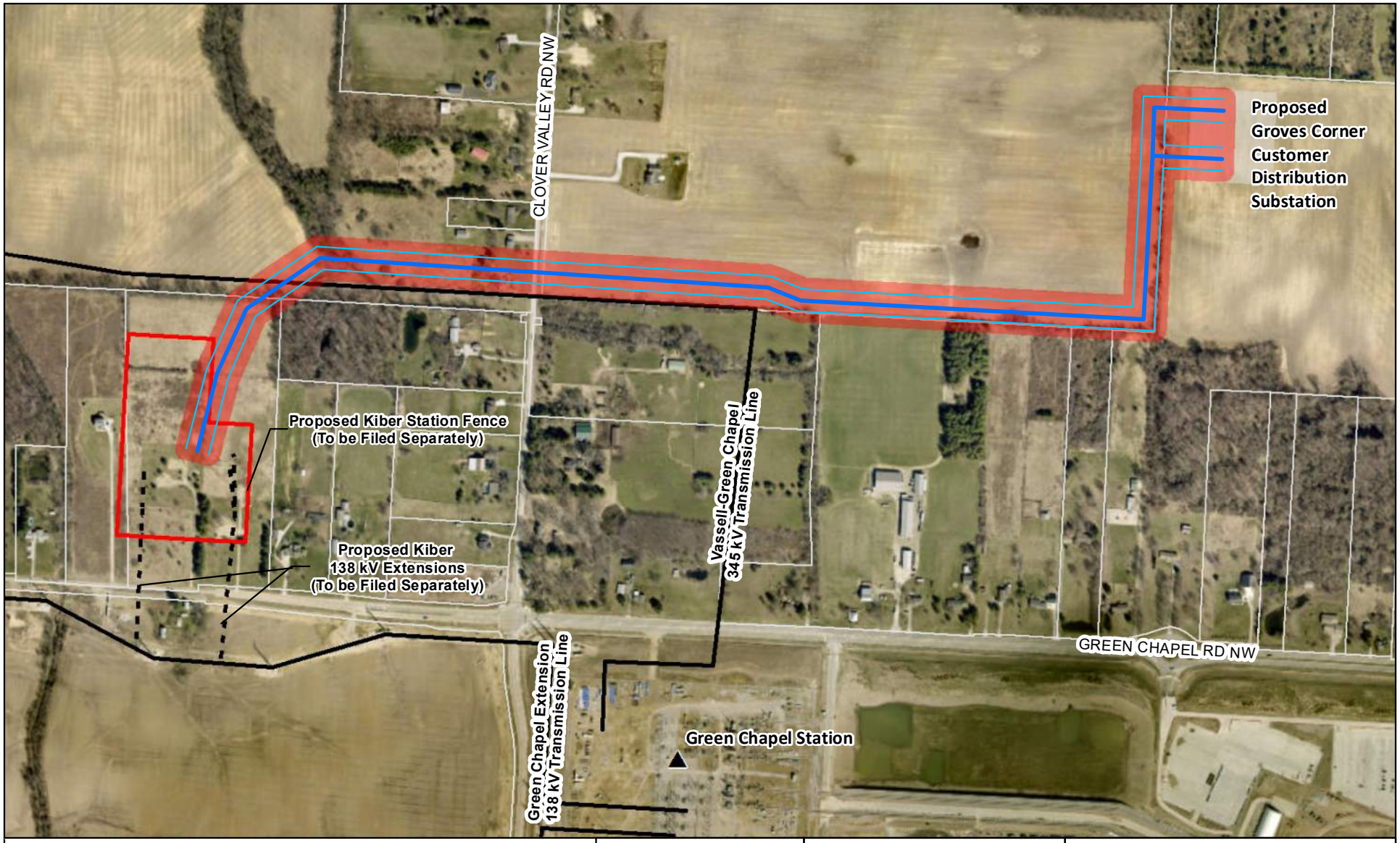
FIGURE 1
TOPOGRAPHIC OVERVIEW

AEP OHIO

Kiber-Groves Corner
138 kV Transmission Line

0 1,000 2,000 3,000

Feet



- Proposed Transmission Line
- Proposed Right-of-way
- Project Corridor
- Proposed Kiber Station Fence (Filed Separately)
- Proposed Kiber 138 kV Extensions (Filed Separately)
- Approximate Customer Distribution Station
- Existing Station
- Existing Transmission Line
- Parcel Boundary

Data Sources: AEP, ESRI World Imagery (2025)

Ohio State Plane South NAD 1983

December 02, 2025

PROJECT LOCATION

LICKING COUNTY, OHIO

FIGURE 2
PROJECT AERIAL MAP

AEP OHIO

Kiber-Groves Corner 138 kV Transmission Line

0 300 600 900 1,200

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

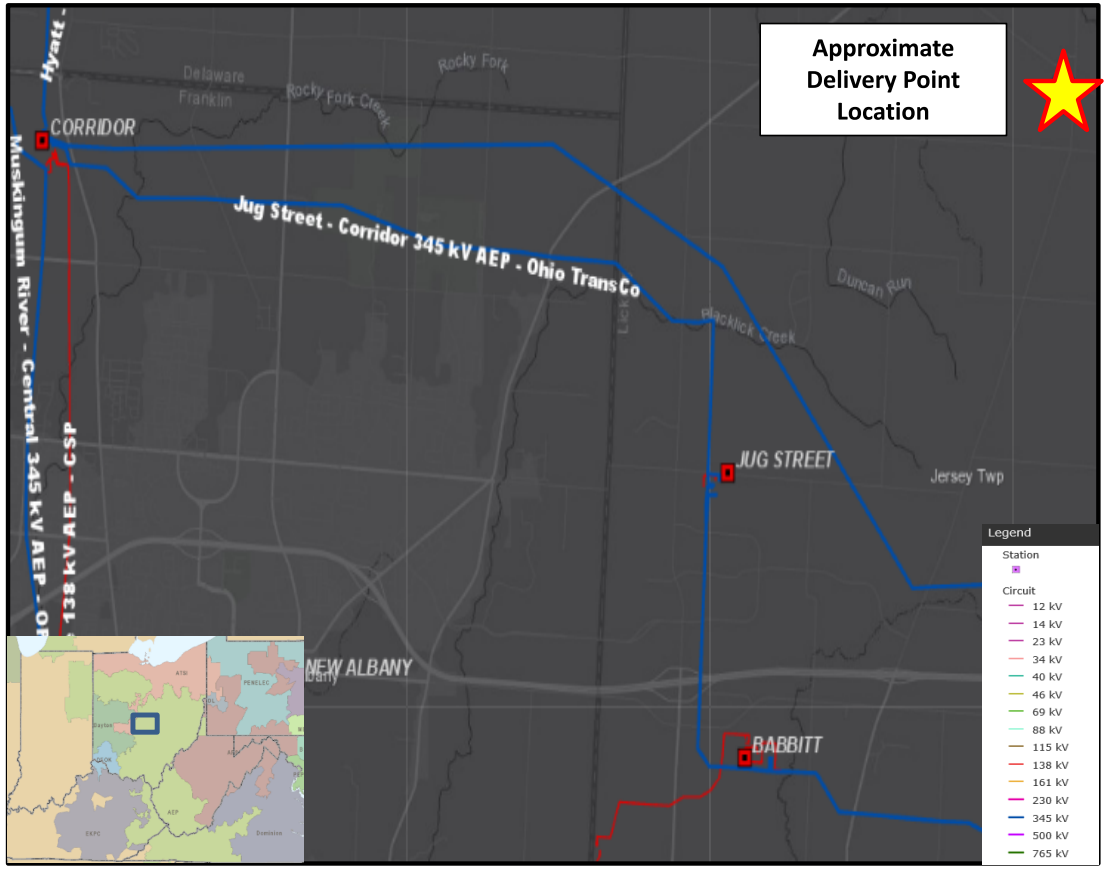
Specific Assumption Reference:

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

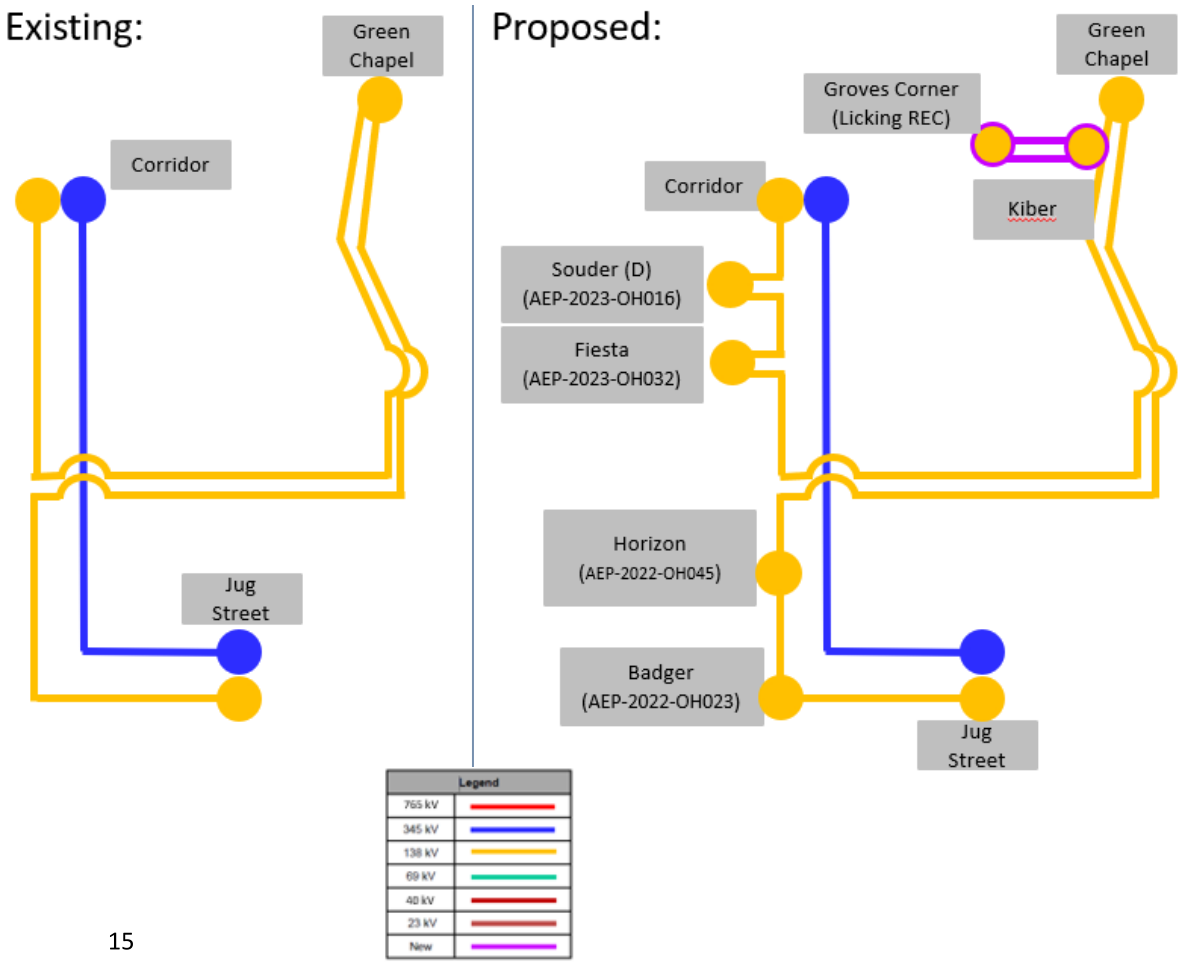
Transmission Cost Estimate: $32.288 M

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



12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Unable to serve new customer
13	**MISCELLANEOUS:**	N/A
1	**LINE NAME AND NUMBER:**	Kiber -Groves Corner (TP2023060 s3442)
2	**POINTS OF ORIGIN AND TERMINATION**	Kiber - Groves Corner INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	2 mi / 100 ft / 2 circuit
4	**OPERATE**	138 / 138 kV
5	**APPLICATION FOR**	2025
6	**CONSTRUCTION:**	2025
7	**CAPITAL INVESTMENT:**	$16.5 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:**	N/A
1	**LINE NAME AND NUMBER:**	Sifford – Ruble #2a 138 kV (TP2023127 s3305)
2	**POINTS OF ORIGIN AND TERMINATION**	Sifford – Ruble #2a INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	0.25 mi / 100 ft / 1 circuit
4	**VOLTAGE: DESIGN / OPERATE**	138 kV / 138 kV
5	**APPLICATION FOR CERTIFICATE:**	2024
6	**CONSTRUCTION:**	2024 / 2025
7	**CAPITAL INVESTMENT:**	$2.948 M
8	**PLANNED SUBSTATION:**	N/A
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:**	N/A
1	**LINE NAME AND NUMBER:**	Sifford – Ruble #2b 138 kV (TP2023127 s3305)
2	**POINTS OF ORIGIN AND TERMINATION**	Sifford – Ruble #2b INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	0.25 mi / 100 ft / 1 circuit

Appendix C Agency Correspondence

In reply, refer to
2025-LIC-65954

September 3, 2025

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

RE: Kiber – Duncan Plains 138kV Greenfield Transmission Line Project, Licking County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on August 5, 2025, regarding the proposed Kiber – Duncan Plains 138kV Greenfield Transmission Line 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 1.5 km (0.9 mi) Long Kiber – Duncan Plains 138kV Greenfield Transmission Line in Monroe Township, Licking County, Ohio* (Cooper and McIntosh 2025). A literature review, visual inspection, surface collection, and shovel test unit excavations were completed as part of the investigations. Portions of the project corridor had been previously surveyed and were not re-surveyed. Four (4) previously documented archaeological sites, Ohio Archaeological Inventory (OAI) sites 33LI3622-33LI3624 and 33LI3810, were located within the project corridor. These sites were not re-identified during the current investigations; however, our office previously agreed they were not eligible for the National Register of Historic Places (NRHP; letters dated January 8, and October 24, 2024). There were two (2) new archaeological sites (33LI3995 and 33LI3996) identified within the project corridor. Neither site was recommended as eligible for the NRHP. Our office agrees with these recommendations. No additional archaeological survey is recommended.

Based on the information provided, our office agrees 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. 1110255

Department of Natural Resources
ohiodnr.gov

Mike DeWine, *Governor*
Jim Tressel, *Lt. Governor*
Mary Mertz, *Director*

Office of Real Estate & Land Management
Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

March 27, 2025

Jesse Killosky
AECOM
707 Grant Street, 5th Floor
Pittsburgh, Pennsylvania 15219

Re: 25-0339_Kiber to Duncan Plains

Project: The proposed project involves building a new 2.0-mile, greenfield 138kV transmission line to connect the new Kiber Station to the Duncan Plains Licking Rural Electric Co-op Station.

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 a state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree

cutting inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

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

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

The project is within the range of the sandhill crane (*Antigone canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat

during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

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.

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

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

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

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

March 10, 2025

Project Code: 2025-0059114

Dear Ms. Killosky:

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: The proposed project is in the vicinity of one or more confirmed records of Indiana bats and/or northern long-eared bats. Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, we recommend removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. Please note that, because Indiana bat and/or northern long-eared bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.

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

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

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

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

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

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

Sincerely,

Erin Knoll
Field Office Supervisor

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

Appendix D Ecological Survey Report

KIBER TO DUNCAN PLAINS 138KV

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 #: 60716174

October 2025

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1.0 INTRODUCTION

American Electric Power Ohio Transmission Company (AEP Ohio Transco) proposed the construction of 2 miles of greenfield line of 138kV to connect the new Kiber Station to the Duncan Plains Licking Rural Electric Co-op station located in Licking County, Ohio (OH). The Project Survey Area associated with this Ecological Report is located within the Johnstown, OH United States Geological Survey (USGS) 7.5-minute topographical quadrangle 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 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 43.50 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. During the Ecological Investigations on January 26 and April 19, 2024 four PEM wetlands (W-MRK-001, W-AGS-004, W-AGS-006 and W-MRK-006), one PFO wetland (W-MRK-007), two PEM/PSS wetland complexes (W-AGS-002 and W-AGS-005), and three streams (S-MRK-007, S-AGS-003 and S-AGS-004) were identified. 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 presence

of the wetland. An additional Ecological Investigation was completed on July 31, 2025, upon the expansion of the study area. During this investigation, four UDFs (UDF-AGS-006, UDF-AGS-007, UDF-AGS-008, and UDF-AGS-009) were identified. 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, four soil map units are mapped within the Project Survey Area (USDA NRCS, 2023a and 2023b). Of these, one was identified as hydric soil, and three 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%
Centerburg	Cen1B1	Centerburg silt loam, 2 to 6 percent slopes	Ground moraines, end moraines	Yes*	Condit 4%, Marengo 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). The feature was field verified as S-AGS-001, a perennial stream and continues outside of the Project Survey Area. It also identified a Palustrine, Emergent, Persistent, Temporarily Flooded (PEM1A). The feature was field verified as not existing, and a representative data point was taken within this feature (W-AGS-002-UPL). 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 through July 28,2025 with identification of three PEM wetlands (W-AGS-004, W-AGS-006 and W-MRK-006), one PFO wetland (W-MRK-007), two PEM/PSS wetland complexes (W-AGS-002 and W-AGS-005) The boundaries of these delineated wetlands are provided on **Figures 2 and 3**.

AECOM has identified four wetlands within the Project Survey Area as non-isolated and three as isolated. 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 in **Figure 3**. The completed data forms and photographs of each wetland are provided in **Appendix B**.

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 *Cornus amomum*, Silky dogwood, a facultative wet species and *Epilobium coloratum*, Purple-leaf willowherb, 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.

TABLE 2 – SUMMARY OF DELINEATED WETLANDS WITHIN THE PROJECT 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-AGS-002	40.127886	-82.721644	No	PEM	0.05	34	2	TBD	None	TBD	TBD	TBD	TBD
	40.127920	-82.721484		PSS	0.02			TBD	None	TBD	TBD	TBD	TBD
W-AGS-004	40.127705	-82.717859	No	PEM	0.02	22	1	TBD	None	TBD	TBD	TBD	TBD
W-AGS-005	40.127816	-82.717864	Yes	PEM	0.01	22	1	TBD	None	TBD	TBD	TBD	TBD
	40.127872	-82.717894		PSS	0.02			TBD	None	TBD	TBD	TBD	TBD
W-AGS-006	40.128406	-82.725012	No	PEM	0.08	12.5	1	TBD	None	TBD	TBD	TBD	TBD
W-MRK-001	40.126941	-82.727296	Yes	PEM	0.77	24	1	TBD	None	TBD	TBD	TBD	TBD
W-MRK-006	40.127628	-82.712535	No	PEM	0.02	23	1	TBD	None	TBD	TBD	TBD	TBD
W-MRK-007	40.128001	-82.725112	Yes	PFO	0.52	35.5	2	TBD	None	TBD	TBD	TBD	TBD
Total:					1.51							**TBD**	**TBD**

3.2 STREAM DELINEATION

During the field survey, AECOM delineated three streams one perennial, one intermittent and one ephemeral stream within the Project Survey Area (**Figure 3**). Of these two were classified using HHEI evaluations that identified one Class I PHW and one Modified Class I PHW. This stream had an existing OEPA Aquatic Life Use Designation of Warmwater Habitat (WWH) under Ohio Revised Code (ORC) Chapter 3745-1, which takes 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 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-003	40.128574	-82.725145	Ephemeral	N/A	55	5	3	HHEI	23	Mod Class I PHW	Eligible	TBD	TBD	TBD
S-AGS-004	40.127823	-82.721667	Intermittent	N/A	11	4	2	HHEI	23	Class I PHW	Eligible	TBD	TBD	TBD
S-MRK-007	40.128655	-82.725103	Perennial	Kiber Run	1,972	15	11	Ch. 3745-1	N/A	WWH	Eligible	TBD	TBD	TBD
				Total:	**2,038**									**TBD**

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	1
		Total	**1**

3.3 FEMA 100 YEAR FLOODPLAINS

One regulated FEMA 100-year floodplain, associated with S-MRK-007 (Kiber 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 three upland drainage features within the Project Survey Area. The extent of the upland drainage features are 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, agricultural row-crop, 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
Agricultural Row-Crop	Includes fields planted in row-crop such as corn, soybean, or winter-wheat.	26.48	60.9%
Landscaped	Landscaped areas, including residential properties and commercial properties, and are frequently mowed and maintained, comprised of grasses and forbs.	3.70	8.5%
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.	5.36	12.3%
Pasture/Hay Fields	Cattle and/or horse pasture, and hay fields, dominated by seasonally mowed and grazed areas of grasses and forbs.	2.04	4.7%
Scrub-shrub	Areas bisecting fields within the survey area that are dominated by shrubs and herbaceous vegetation.	0.75	1.7%
Streams/Wetlands	Wetlands were observed within the survey area for the Project	0.94	2.2%
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.	0.20	0.5%
Woodlands	Woodlands (floodplain, upland, successional-mixed, etc.) are present along the Project Survey Area.	4.02	9.2%
	Totals:	**43.50**	**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. Due to an expansion of the study area, additional coordination letters were sent to USFWS and ODNR ONHP and DOW seeking an environmental review for potential impacts to threatened and endangered species. Reponses were received from USFWS on March 10, 2025, and from the ODNR on March 27, 2025. 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 to Duncan Plains 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 (2025 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 (2025 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 (2025 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 (2025 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 (2025 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 (2025 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.

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 (2025 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 (2025 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-MRK-007, 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.	N**o –** 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

*2025 Joint Guidance – Refers to the 2025 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 2025 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, are 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 is warranted for this Project.

4.0 SUMMARY

The ecological surveys of the Project Survey Area identified four PEM wetlands, one PFO wetland, two PEM/PSS wetland complexes and three streams, no ponds, and three upland drainage features. 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, reptile, 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

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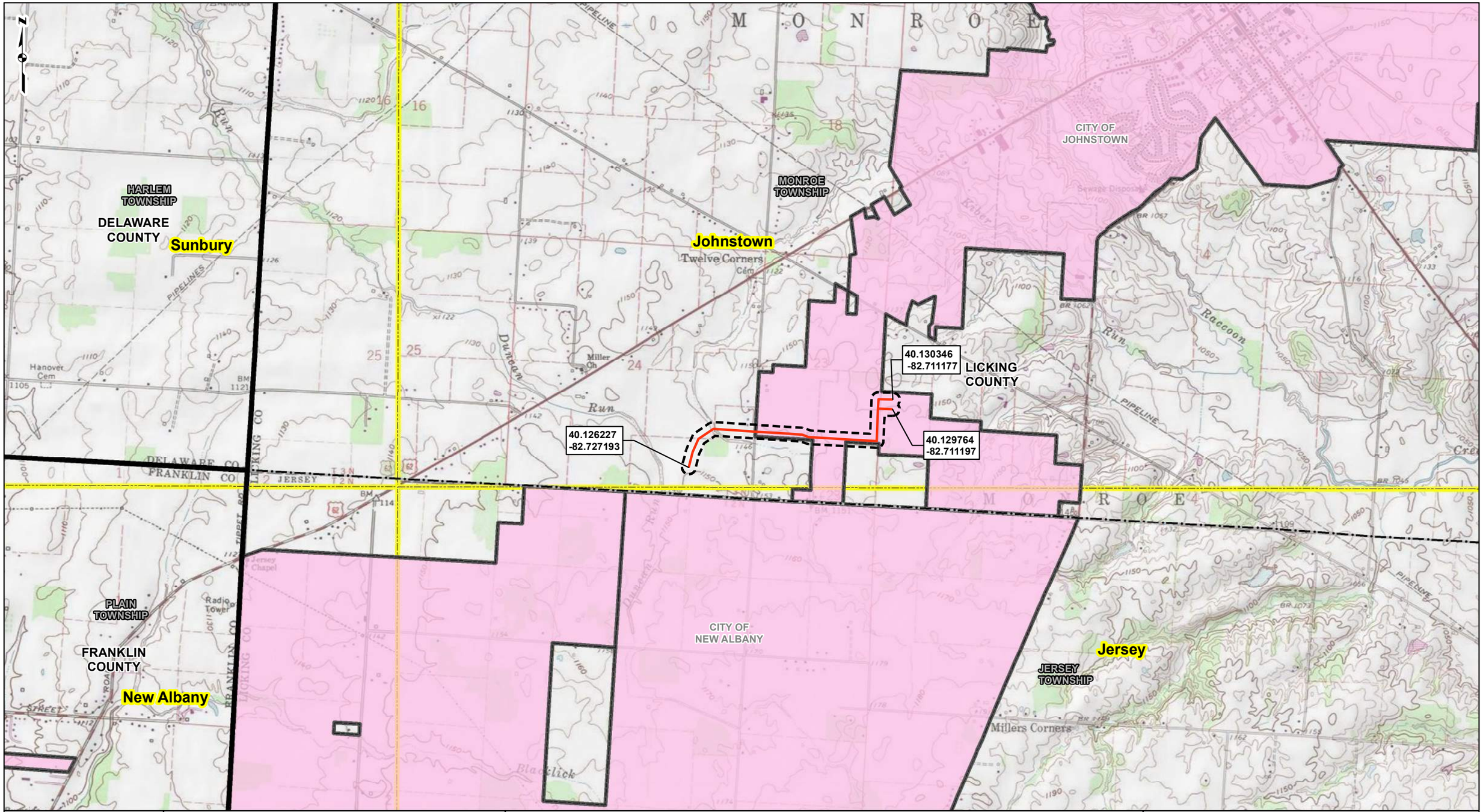

PROJECT LOCATION

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 09/2025.

9/8/2025

LEGEND

- KIBER TO DUNCAN PLAINS 138KV TRANSMISSION LINE
- 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 TO DUNCAN PLAINS
138KV TRANSMISSION LINE PROJECT
AMERICAN ELECTRIC POWER

AMERICAN ELECTRIC POWER

DRAWN BY: ORM DATE: 9/8/2025
CHECKED: CJT | JH APPROVED:

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N

Duncan Run

S-MRK-007
Perennial

S-AGS-003
Ephemeral

S-MRK-007
Perennial

UDF-AGS-008

UDF-AGS-009

W-MRK-006
PEM

W-MRK-001

Kiber Run

UDF-AGS-006

UDF-AGS-007

LICKING
COUNTY

W-AGS-002
PSS

W-AGS-002
PEM

W-MRK-007
PFO

MONROE
TOWNSHIP

S-AGS-004
Intermittent

W-MRK-001
PEM

PH-01

W-MRK-001-UPL

PH-02

Glover Valley Rd NW

Blacklick Creek

REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 10/2025. SOIL SURVEY GEOGRAPHIC (SSURGO), USDA/NRCS, 2024. NHD, USGS 2024. NWI, USFWS 2024. HUC 12, USGS 2024.

10/22/2025

LEGEND

- WETLAND PHOTOGRAPH LOCATION
- WETLAND DATA POINT
- UPLAND DATA POINT
- AECOM CULVERTS
- PROPOSED STRUCTURE
- DELINEATED EPHEMERAL STREAM
- DELINEATED INTERMITTENT STREAM
- DELINEATED PERENNIAL STREAM
- PROPOSED TRANSMISSION LINE
- RIGHT-OF-WAY
- PROJECT SURVEY AREA
- NHD STREAM (USGS)
- 100-YEAR FEMA FLOODPLAIN

0 100 200 400 Feet

FIGURE 3
WETLAND DELINEATION AND STREAM ASSESSMENT MAP

AECOM

KIBER TO DUNCAN PLAINS
138KV TRANSMISSION LINE PROJECT
AMERICAN ELECTRIC POWER

AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH

DATE: 10/22/2025
APPROVED:

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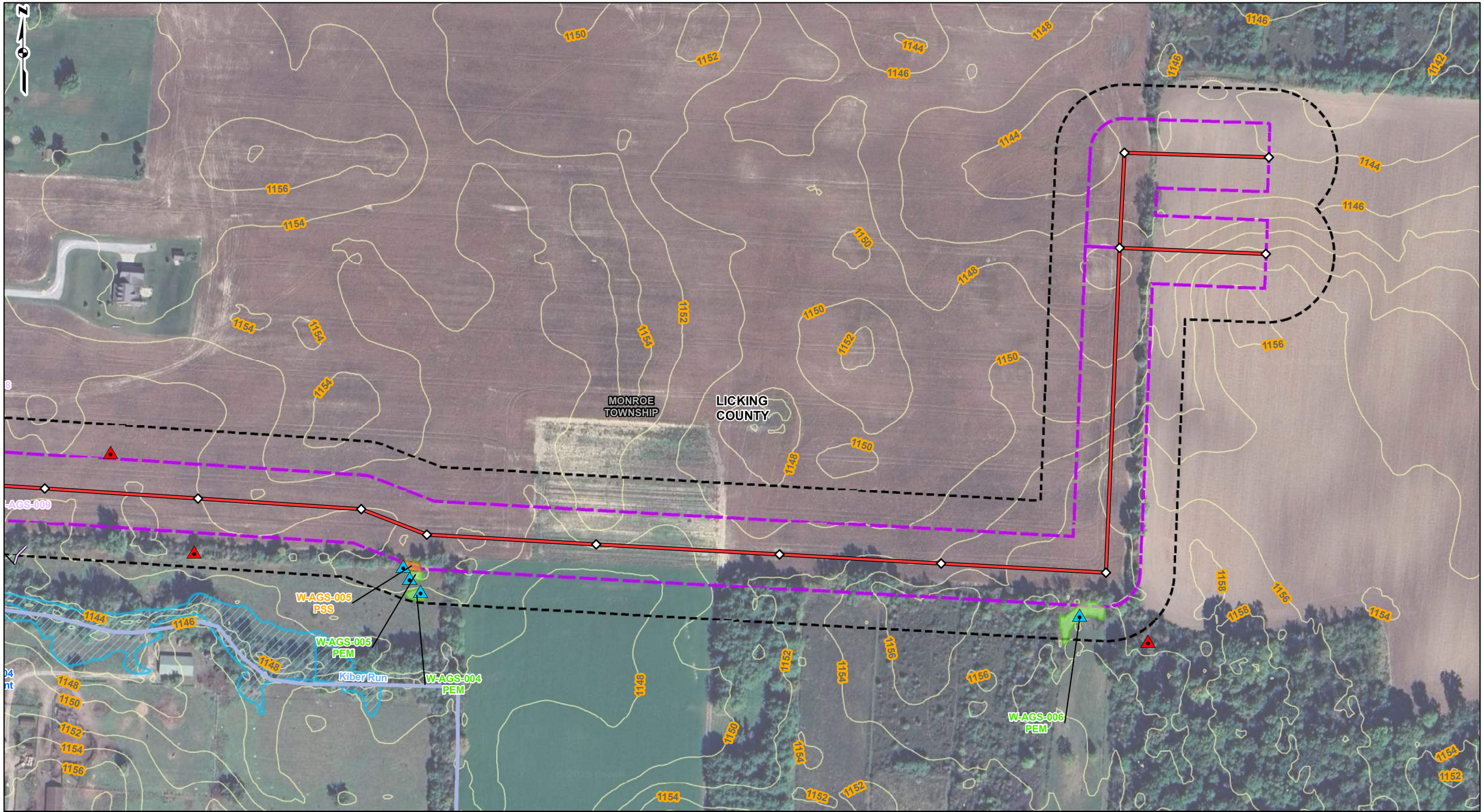

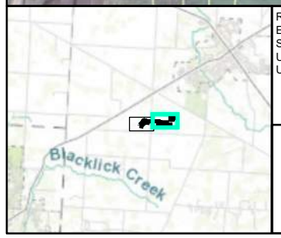

REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 10/2025. SOIL SURVEY GEOGRAPHIC (SSURGO), USDA/NRCS, 2024. NHD, USGS 2024. NWI, USFWS 2024. HUC 12, USGS 2024.

10/22/2025

LEGEND

- WETLAND DATA POINT
- UPLAND DATA POINT
- PROPOSED STRUCTURE
- PROPOSED TRANSMISSION LINE
- RIGHT-OF-WAY
- PROJECT SURVEY AREA
- NHD STREAM (USGS)
- 100-YEAR FEMA FLOODPLAIN

0 100 200 400 Feet

FIGURE 3
WETLAND DELINEATION AND STREAM ASSESSMENT MAP

AECOM

KIBER TO DUNCAN PLAINS
138KV TRANSMISSION LINE PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH

DATE: 10/22/2025
APPROVED:

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N

Duncan Run

Kiber Run

Kiber Run

40.130346
-82.711177

40.129764
-82.711197

OEPA EPA 401
Eligible
Headwaters Raccoon Creek
050400060301

OEPA EPA 401
Eligible
Duncan Run
050600011307

40.126227
-82.727193

OEPA EPA 401
Possibly Eligible
Headwaters Blacklick Creek
050600011503

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 09/2025. OEPA ELIGIBLE WATERSHEDS, OHIO ENVIRONMENTAL PROTECTION AGENCY, 2024.

9/8/2025

LEGEND

NHD STREAM (USGS)

PROJECT SURVEY AREA

OEPA ELIGIBILITY:

ELIGIBLE

INELIGIBLE

POSSIBLY ELIGIBLE

0 500 1,000 2,000 Feet

FIGURE 4
STREAM ELIGIBILTY MAP

AECOM

KIBER TO DUNCAN PLAINS
138KV TRANSMISSION LINE PROJECT
AMERICAN ELECTRIC POWER

AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH

DATE: 9/8/2025
APPROVED:

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REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 09/2025.

9/8/2025

LEGEND

PROJECT SURVEY AREA
PHOTO LOCATION POINT
TOWNSHIP BOUNDARIES

VEGETATIVE COMMUNITY TYPE

AGRICULTURE ROW CROP
LANDSCAPED
OLD FIELD
PASTURE / HAY FIELD
STREAMS / WETLANDS
URBAN
WOODLANDS

0 100 200 400 Feet

FIGURE 5
VEGETATIVE COMMUNITIES
ASSESSMENT MAP

AECOM
KIBER TO DUNCAN PLAINS
138KV TRANSMISSION LINE PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH
DATE: 9/8/2025
APPROVED:

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REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 09/2025.

9/8/2025

LEGEND

PROJECT SURVEY AREA
PHOTO LOCATION POINT
TOWNSHIP BOUNDARIES

VEGETATIVE COMMUNITY TYPE

AGRICULTURE ROW CROP
OLD FIELD
PASTURE / HAY FIELD
SCRUB / SHRUB
STREAMS / WETLANDS
WOODLANDS

0 100 200 400 Feet

FIGURE 5
VEGETATIVE COMMUNITIES ASSESSMENT MAP

AECOM

KIBER TO DUNCAN PLAINS
138KV TRANSMISSION LINE PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: ORM
CHECKED: CJT | JH
DATE: 9/8/2025
APPROVED:

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APPENDIX A

DESKTOP ASSESSMENT FOR WINTER BAT HABITAT

Twelve Corners Cem

Miller Ch

Run

Johnstown

MONROE TOWNSHIP

CITY OF JOHNSTOWN

LICKING COUNTY

Kiber to Duncan #1
40.126395
-82.726914

Kiber to Duncan #2
40.12638
-82.726576

Kiber to Duncan
40.128094
-82.697061

PIPELINE

BR 1062

BM 1151

Duncan Run

CITY OF NEW ALBANY

Jersey

JERSEY TOWNSHIP

Legend

- Kiber to Duncan Plains 138kV
- Quarter Mile Review Area
- City Boundary
- Township Boundary
- County Boundary
- Ohio USGS 7.5' Topographic Quadrangle

N

0 500 1,000 2,000

Feet

Kiber to Duncan Plains 138kV Transmission Line Project

APPENDIX A

DESKTOP ASSESSMENT FOR WINTER BAT HABITAT

DATE: 2/24/2025	1 INCH = 1,000 FEET
CREATED BY: GIB	CHECKED BY: JK
JOB NO.:60720174	AECOM

Date Saved: 2/24/2025
Document Path: X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60716171_Kiber_Station\2_MXDs\0_TE\Kiber to Duncan\Kiber_to_Duncan_Plains_Figure 1_ODNR_Project_Overview.mxd

APPENDIX F

AGENCY RESPONSE LETTERS

Department of Natural Resources
ohiodnr.gov

Mike DeWine, *Governor*
Jim Tressel, *Lt. Governor*
Mary Mertz, *Director*

Office of Real Estate & Land Management
Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

March 27, 2025

Jesse Killosky
AECOM
707 Grant Street, 5th Floor
Pittsburgh, Pennsylvania 15219

Re: 25-0339_Kiber to Duncan Plains

Project: The proposed project involves building a new 2.0-mile, greenfield 138kV transmission line to connect the new Kiber Station to the Duncan Plains Licking Rural Electric Co-op Station.

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 a state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree

cutting inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

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

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

The project is within the range of the sandhill crane (*Antigone canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat

during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

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.

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

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

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

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

March 10, 2025

Project Code: 2025-0059114

Dear Ms. Killosky:

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: The proposed project is in the vicinity of one or more confirmed records of Indiana bats and/or northern long-eared bats. Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, we recommend removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. Please note that, because Indiana bat and/or northern long-eared bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.

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

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

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

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

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

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

Sincerely,

Erin Knoll
Field Office Supervisor

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

Summary: Application LON for Kiber-Groves Corner. electronically filed by Hector Garcia-Santana on behalf of Ohio Power Company.