

Letter of Notification for the Center Bend 138 kV Transmission Line Extension Project



PUCO Case No. 26-0963-EL-BLN

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

Submitted by:
Ohio Power Company

October 8, 2026

LETTER OF NOTIFICATION FOR THE CENTER BEND 138 KV TRANSMISSION LINE EXTENSION PROJECT

LETTER OF NOTIFICATION

Ohio Power Company

Center Bend 138 kV Transmission Line Extension 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 (“Adm.Code”) Section 4906-6-05.

4906-6-05(B) General Information

B(1) Project Description

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

The Company proposes to construct the Center Bend 138 kV Transmission Line Extension Project (the “Project”) in Center Township, Morgan County, Ohio. The Project will provide 138 kV service to a customer facility. The proposed transmission line is approximately 1.0 mile long and will extend from the Company’s Muskingum River 138 kV Station to the customer’s distribution substation. Other than a short section at the Muskingum River, the Project will be built on land owned by the Company and a the customer. Steel H-frame, monopole and three-pole structures will be placed in a proposed 150-foot right-of-way (ROW). The location of the Project is shown on **Figure 1** and **Figure 2** in **Appendix A**.

The Project meets the requirements for a Letter of Notification (LON) as defined by Items 1(d)(ii) of Appendix A to Adm.Code 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. 26-0963-EL-BLN.

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B(2) Statement of Need

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

A customer has requested a new 138 kV delivery to serve their facility requiring 200 MW of initial and ultimate peak demand in the Waterford, Ohio area. To meet the customer's request, the Company will install equipment at Muskingum Station and install an approximately 1.0-mile 138 kV line from Muskingum Station to the customer station.

Ohio Substitute House Bill 15, effective in August 2025, requires applicants for certificates of environmental compatibility and public need for the construction of new transmission lines to submit a summary of studies that have been made by or for the applicant of cost-effective advanced transmission technologies that maximize the value, expand the capacity, or improve the reliability of the facility. R.C. 4906.06(A)(7). The statutory definition of advanced transmission technology includes advanced conductors, defined as "conductor with a direct current electrical resistance that is at least ten per cent lower than existing conductors of a similar diameter on the electric transmission system while simultaneously increasing the energy carrying capacity by at least seventy-five per cent." R.C. 4906.01(N). In subsequent rulemaking, the Ohio Power Siting Board determined that the advanced transmission technology requirements in Substitute House Bill 15 are inapplicable to short, gen-tie lines. *In the Matter of the Consideration of Ohio Power Siting Board Rules, as Required by Substitute House Bill Number 15*, Case No. 25-757-GE-BRO, Finding and Order, ¶ 9 (Nov. 20, 2025). Here, the Project scope is similar to that of a gen-tie line, and therefore the Company determined that no advanced transmission technologies as defined by the Revised Code are required or would be cost-effective to implement. Advanced Transmission Technologies do not offer enough benefits in lieu of a traditional / robust solution needed for this specific case.

Failure to move forward with the proposed Project will result in the inability to serve the customer's projected 200 MW load expectations and thereby jeopardize the customer's plans in the Waterford area.

The need for the customer driven supplemental project was presented and reviewed with stakeholders during the August 15, 2025 PJM SRRTEP meeting. The solution was presented and reviewed with stakeholders during the PJM SRRTEP meeting on May 15, 2026. The PJM identifier s4024 has been assigned to the Project.

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**.

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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 primarily on Company or customer property. Based on the customer's proposed development, existing facilities, steep topography, and the Muskingum River, the proposed location is the most suitable location for the Project. Other alternatives would require impacting additional neighboring properties, as opposed to remaining primarily on the Company's and customer's land. The Project will not require impacts to any delineated wetlands or streams. The location of the Project minimizes impacts to the community and the environment, while considering the engineering and construction needs of the customer. The Project also represents the most suitable location and most appropriate solution for meeting the Company's and customer's 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 affected 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 Adm.Code 4906-6-08(A)(1-6). Further, the Company will mail a letter, via first class mail, to affected landowners, tenants, contiguous owners and any other landowner the Company may approach for an easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with all requirements of Adm.Code 4906-6-08(B). The Company maintains a website (<http://AEPTransmission.com/Ohio/filings.php/>) 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 no earlier than January 6, 2027 with an anticipated in-service date of November 2027.

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B(7) Area Map

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

Figure 1, in Appendix A, identifies the location of the Project area on a United States Geological Survey 1:24,000 quadrangle map of Beverly, Ohio. **Appendix A, Figure 2** displays the Project components on a 2025 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)
030-006-590-0	Company Owned	N/A
030-006-590-1	New Easement	No
030-006-140-0	Company Owned	N/A
030-006-230-0	Company Owned	N/A
030-002-990-0	Company Owned	N/A
030-007-530-1	New Easement (Customer Owned)	No
030-006-280-0	New Easement (Customer Owned)	No
030-007-520-0	New Easement (Customer Owned)	No

The easement form exhibit provided in **Appendix B** represents the minimum rights the Company would require in order to construct, operate, and maintain these facilities.

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.

Transmission Lines

The transmission line is estimated to include the following:

Voltage: 138kV
Conductors: Single Bundled 556.5 KCMIL 26/7 “Drake” ACSR

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Static Wire: (2) 144ct OPGW
Insulators: Polymer
ROW Width: 150 feet
Structure Type: Four (4) single circuit, steel H-frames
Five (5) single circuit 3-pole steel Dead-ends
One (1) single circuit steel monopole 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 \$6 million 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 location and vicinity have historically been primarily industrial or vacant land adjacent to the Muskingum River. An aerial photograph of the Project vicinity is provided as **Figure 2**. The Project is mapped within Center Township in Morgan County and within Waterford Township in Washington County. The Project vicinity beyond the industrial area is currently rural in nature and is comprised primarily of pastures and forested land across the rolling landscape with scattered residences. The Project anticipates the need to clear approximately 3.8 acres of forested land.

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B(10)(b) Agricultural Land

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

No agricultural land is within the Project Area. Based on data received from the Morgan County Auditor's office on September 14, 2026, there are no agricultural district parcels within the potential disturbance area of the Project. No Ohio Department of Agriculture easements are crossed.

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 March 2026. Correspondence from the State Historic Preservation Office ("SHPO") was received in March 2026, see **Appendix C**. The SHPO stated 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 **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
General Permit for Stormwater Discharges Associated with Construction Activity under the National Pollutant Discharge Elimination System (NPDES) - OHC000006	Ohio Environmental Protection Agency	Expected December 2026
Notice Criteria	Federal Aviation Administration	Submitted through Criteria Tool on 9/30/2026, no further action required
Clean Water Act Section 404/401	United States Army Corps of Engineers	Not Anticipated

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	Ohio Environmental Protection Agency	
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete March 30, 2026, no additional work required
Threatened and Endangered Species	United States Fish and Wildlife Service	Consultation complete 7/14/2026
Threatened and Endangered Species	Ohio Department of Natural Resources	Consultation complete 7/22/2026
Section 10 River Crossing	United States Army Corps of Engineers	Anticipated filing for Muskingum River, October 2026

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

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

On June 18, 2026, coordination letters were submitted to the United State Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review of the Project for potential impacts to state and/or federally protected species. ODNR and USFWS provided responses on July 14, 2026, and July 22, 2026, respectively. Copies of the agencies' responses are presented in **Appendix C**.

Table 3, in **Appendix D** lists the federal and state threatened or endangered species in the Project area.

No in-water work is proposed, and tree clearing is expected to occur between October 1 and March 31. Based on the nature of the proposed Project activities and habitat characteristics of the surrounding vicinity, construction impacts to protected species are not anticipated.

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B(10)(f) Areas of Ecological Concern

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

The Company's consultant conducted a wetland and stream delineation survey in the Project study area on June 30, 2026 and prepared an Ecological Survey Report, which is provided in **Appendix D**. The survey of the Project area identified one wetland and seven streams. The Project construction activities are not expected to result in discharge of fill in any of the delineated features. The wetland is expected to be avoided by construction activities. The Muskingum River is considered a navigable waterway, with the proposed aerial crossing requiring a Section 10 permit. Remaining streams 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.

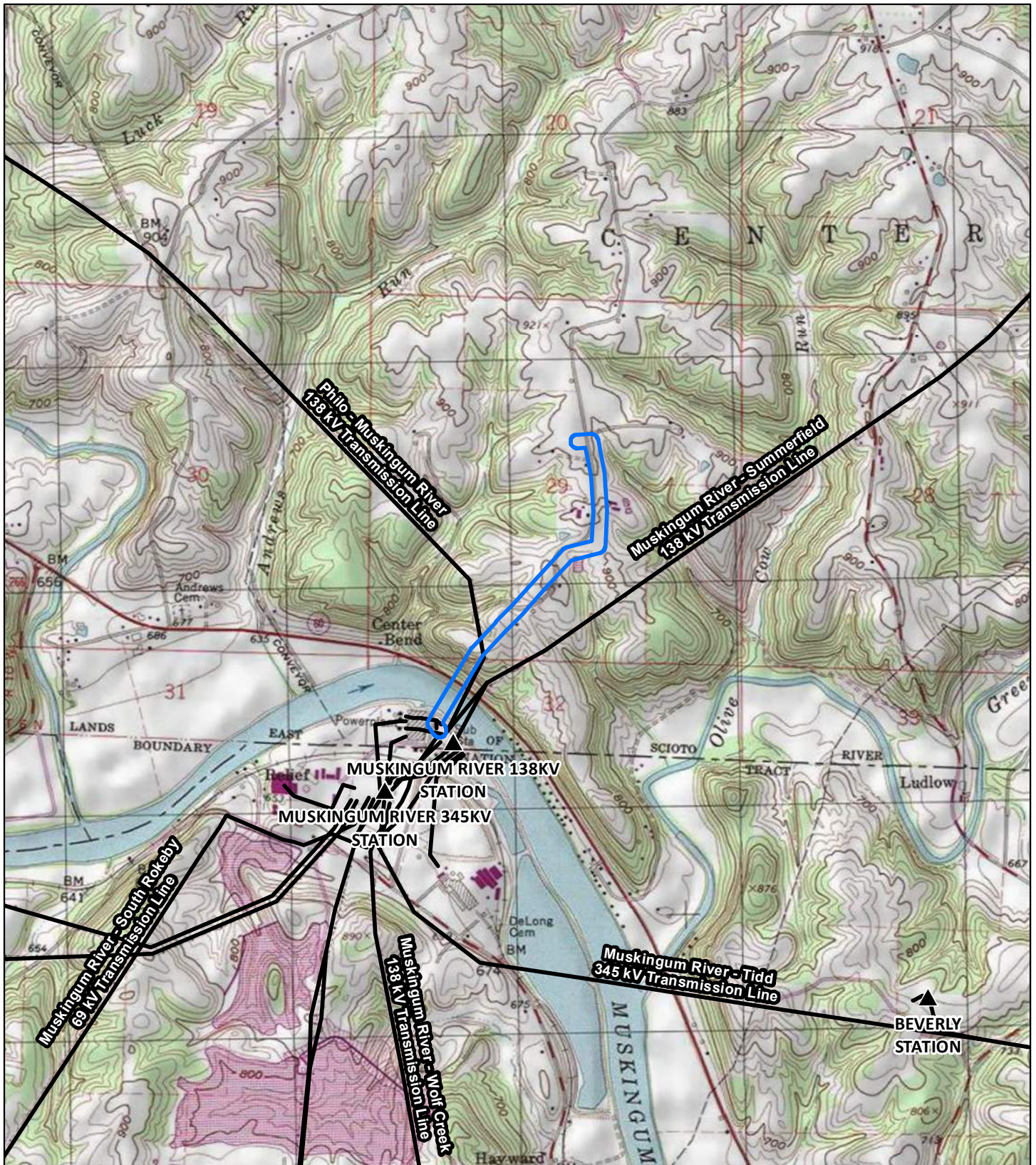
The FEMA Flood Insurance Rate Map ("FIRM") was reviewed to identify any floodplains/flood hazard areas that have been mapped within the Project Area (specifically, map numbers 39167C0050F and 39115C0325D). Based on this mapping, the portion of the Project adjacent to the Muskingum River will cross the FEMA-designated the 100-year floodplain (Zone AE). No proposed structures, access roads, or other construction activities are planned to be located within the floodplain areas. Floodplain permitting is not required.

B(10)(g) Unusual Conditions

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

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

Appendix A Project Maps



- ▭ Project Area
- Existing Transmission Line
- ▲ Existing Station

Data Sources:
USGS Topographic Quadrangle
Beverly, Ohio

Ohio State Plane South
NAD 1983



October 06, 2026

PROJECT LOCATION

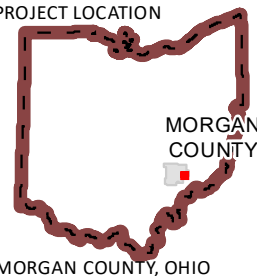
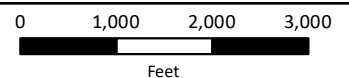
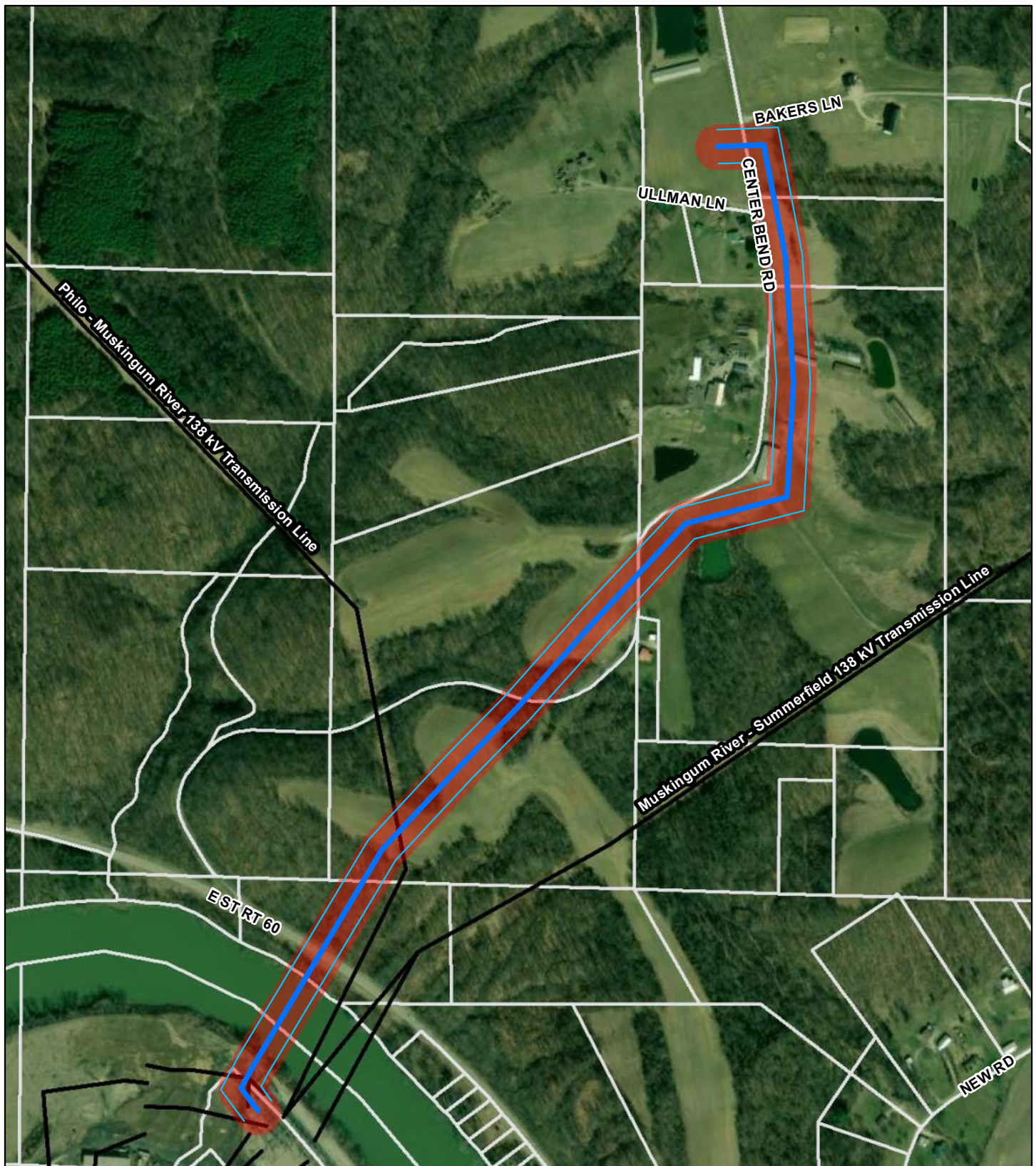


FIGURE 1
TOPOGRAPHIC OVERVIEW



Center Bend 138 kV
Transmission Line
Extension Project





Legend:

- Proposed Transmission Line
- Proposed Right-of-way
- Project Corridor
- Existing Transmission Line
- Parcel Boundary

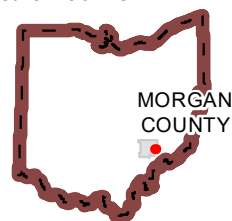
Data Sources: AEP,
ESRI World Imagery

Ohio State Plane South
NAD 1983



October 06, 2026

PROJECT LOCATION

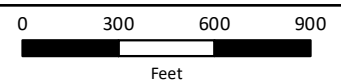


MORGAN COUNTY, OHIO

**FIGURE 2
PROJECT AERIAL MAP**



**Center Bend 138 kV
Transmission Line
Extension Project**



Appendix B Form Easement

Line Name:

Line No.: TLN **Easement No.:**

EASEMENT AND RIGHT OF WAY

On this ____ day of _____, 2025, in consideration of Ten and NO/100 Dollars (\$10.00), and other valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and the covenants hereinafter set forth, **Owner's Name**, whose address Address, ("Grantor"), whether one or more persons, hereby grants, sells, conveys, and warrants to **OPCO**, a(n) Ohio corporation, a unit of American Electric Power, whose principal business address is 1 Riverside Plaza, Columbus, Ohio 43215, ("AEP") and its successors, assigns, lessees and tenants a permanent easement and right of way ("Easement"), for electric transmission, distribution, and communication lines and appurtenant equipment and fixtures, being, in, on, over, under, through and across the following described lands of the Grantor, situated in the State of Ohio, _____ County, _____ Township, Section ____, Township No. ____, Range No. ____, Tax Parcel Number Parcel Number.

Grantor claims title by Type of Deed in Official Record Book Book, Page Page recorded Date in the County County Recorder's Office.

Auditor/Key/Tax Number: Parcel Number

The Easement Area is more fully described and depicted on Exhibit "A", a copy of which is attached hereto and made a part hereof ("Easement Area").

GRANTOR FURTHER GRANTS AEP THE FOLLOWING RIGHTS:

The right, now or in the future, to construct, reconstruct, operate, maintain, alter, improve, extend, inspect and patrol (by ground or air), protect, repair, remove, replace, upgrade and relocate within the Easement Area, poles, towers, and structures, made of wood, metal, concrete or other materials, and crossarms, guys, anchors, grounding systems, and all other appurtenant equipment and fixtures, and to string conductors, wires and cables; together with the right to add to said facilities from time to time, and the right to do anything necessary, useful or convenient for the enjoyment of the Easement herein granted.

The right, in AEP's discretion, now or in the future, to cut down, trim, remove, and otherwise control, using herbicides or tree growth regulators or other means, any and all trees, overhanging

branches, vegetation or brush situated within the Easement Area. AEP shall also have the right to cut down, trim or remove trees situated on lands of Grantor which adjoin the Easement Area when in the opinion of AEP those trees may endanger the safety of, or interfere with the construction, operation or maintenance of AEP's facilities or ingress or egress to, from or along the Easement Area.

The right of unobstructed ingress and egress, at any and all times, over, across and along and upon the Easement Area, and across the adjoining lands of Grantor as may be necessary for access to and from the Easement Area for the above referenced purposes.

THIS GRANT IS SUBJECT TO THE FOLLOWING CONDITIONS:

The Grantor reserves the right to cultivate annual crops, pasture, construct fences (provided gates are installed that adequately provide AEP the access rights conveyed herein) and roads or otherwise use the lands encumbered by this Easement in any way not inconsistent with the rights herein granted. In no event, however, shall Grantor, its heirs, successors, and assigns plant or cultivate any trees or place, construct, install, erect or permit any temporary or permanent building, structure, improvement or obstruction including but not limited to, storage tanks, billboards, signs, sheds, dumpsters, light poles, water impoundments, above ground irrigation systems, swimming pools or wells, or permit any alteration of the ground elevation, over, or within the Easement Area. AEP may, at Grantor's cost, remove any structure or obstruction if placed within the Easement Area, and may re-grade any alterations of the ground elevation within the Easement Area.

AEP agrees to repair or pay the Grantor for actual damages sustained by Grantor to crops, fences, gates, irrigation and drainage systems, drives, or lawns that are permitted herein, when such damages arise out of AEP's exercise of the rights herein granted.

The failure of AEP to exercise any of the rights granted herein, or the removal of any facilities from the Easement, shall not be deemed to constitute an abandonment or waiver of the rights granted herein.

This instrument contains the complete agreement, expressed or implied between the parties herein and shall inure to the benefit of and be binding on their respective successors, assigns, heirs, executors, administrators, lessees, tenants, and licensees.

This Easement may be executed in counterparts, each of which shall be deemed an original, but all of which, taken together, shall constitute one and the same instrument.

Any remaining space on this page left intentionally blank. See next page for signatures.

IN WITNESS WHEREOF, the Grantor has executed this Easement effective the day, month and year first above written.

GRANTOR

Owner's Name

State of Ohio §
 §
County of §

The foregoing instrument was acknowledged before me this _____ day of _____, 2025, by Owner's Name.

Notary Public
Print Name: _____
My Commission Expires: _____

IN WITNESS WHEREOF, the Grantor has executed this Easement effective the day, month and year first above written.

GRANTOR

Owner's Name

State of Ohio §
 §
County of §

The foregoing instrument was acknowledged before me this _____ day of _____, 2025, by Owner's Name.

Notary Public
Print Name: _____
My Commission Expires: _____

This instrument prepared by Marland L. Turner, Senior Counsel - Real Estate, American Electric Power Service Corporation, 1 Riverside Plaza, Columbus, OH 43215 for and on behalf of Ohio Power Company, a unit of American Electric Power.

When recorded return to: American Electric Power - Transmission Right of Way, 8600 Smiths Mill Road, New Albany, OH 43054.

Appendix C Agency Correspondence



In reply refer to:
2025-MLT-66434

March 30, 2026

Chad Porter
Weller & Associates, Inc.
1395 West 5th Ave.
Columbus, OH 43212
Email: c.porter@wellercrm.com

RE: Section 106 Review: Bit 56 Delivery Project, Morgan and Washington Counties, Ohio

Dear Mr. Porter:

This letter is in response to the correspondence received on March 6, 2026, regarding the proposed Bit 56 Delivery Project in Center Township, Morgan County and Waterford Township, Washington 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) for siting this project (OAC 4906-4 & 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Cultural Resource Management Addendum Investigations for Proposed Bit 56 Delivery Project in Center Township, Morgan County and Waterford Township, Washington County, Ohio* (Weller & Associates, Inc., 2026). This project investigated proposed line shifts located outside previously surveyed and addressed areas. Shovel testing, surface collection, visual inspection, and an updated literatures review were completed as part of the investigations. One (1) archaeological site (33MG0275) was recorded as part of these investigations. 33MG0257 consists of one (1) prehistoric and three (3) historic artifacts. Weller recommended that the site is not considered eligible for inclusion into the National Register of Historic Places (NRHP) and that no further work is necessary. Our office agrees with these determinations.

The following comments pertain to the Architectural Investigations included within the above-mentioned report. In the report, ten (10) architectural resources were identified within the projects Area of Potential Effect. One of these resources, located at 17124 Harmon Patrick Rd, is listed on the NRHP as the Muskingum River Navigation Historic District (Ref. 07000025). This resource was reviewed in the original project submission, and it was determined that there would be no adverse effect on historic resources. No other architectural resources were recommended as eligible for listing in the NRHP. Our office agrees with these findings.

Based on the information provided, our office continues to agree that the project, as proposed, will have no adverse effect on historic properties. Therefore, no further coordination is required, unless the project changes or additional archaeological resources are discovered during the implementation of this project. In such a situation, this office should be contacted as required by 36 CFR § 800.13. If you

2025-MLT-66434

March 30, 2026

Page 2

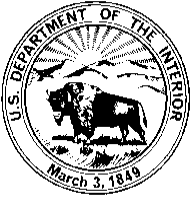
have any questions regarding history/architecture, please contact Gabrielle Doty at gdoty@ohiohistory.org. If you have any questions concerning archaeology or this review, please contact Bridget Roddy via email at broddy@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Bridget C. Roddy". The signature is fluid and cursive, with the first name being the most prominent.

Bridget C. Roddy, Project Reviews Manager-Archaeology
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1113131



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



July 14, 2026

Project Code: 2026-0102629

Dear Ms. Speckman:

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

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Bridges and culverts have also been used as roosts. Additionally, northern long-eared bats have been observed roosting in other human-made structures, such as buildings, barns, 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 Restrictions for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. If bridges or culverts will be impacted, we recommend reviewing Appendix K in the most recent "Range-Wide Indiana Bat & Northern Long-Eared Bat Survey Guidelines" to determine if the bridge/culvert may be suitable roost habitat. We recommend impacts to suitable bridges and culverts only occur from October 1 and March 31. These seasonal restrictions are recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

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

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

On December 12, 2024 the Service proposed to list the monarch butterfly (*Danaus plexippus plexippus*) as threatened under the ESA. Monarch butterflies are found throughout Ohio and some populations migrate vast distances across multiple generations each year. Many monarchs fly between the U.S., Mexico and Canada – a journey of over 3,000 miles. Monarch populations have declined significantly in recent years. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar's sole food source – and mortality resulting from pesticide use. The Service recommends the following actions to maintain habitat and avoid impacts to monarchs in Ohio: revegetate disturbed areas with native plant species including nectar-producing plants and milkweed endemic to the area; limit mowing monarch habitat from March 15 to August 31 when monarchs are breeding and from September 1 to October 31 when large numbers of monarchs are migrating; and avoid the use of pesticides and herbicides in and near monarch habitat.

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.

Bald Eagle: The project is in the range of the bald eagle (*Haliaeetus leucocephalus*), which is protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). We recommend that you visit <https://ohiodnr.gov/discover-and-learn/animals/birds/bald-eagle> to determine if the project is within 0.5 mile of a documented eagle nest. Additionally, because not all eagle nests in the state have been mapped, we recommend that an on-site examination be conducted to determine if any large stick nests are visible from project area. If the project is within 0.5 mile of a documented eagle nest or the on-site examination reveals the presence of a potential eagle nest, we

recommend visiting <https://www.fws.gov/story/do-i-need-eagle-take-permit> to determine if an eagle take permit is required.

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

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

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, 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



**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

July 22, 2026

Alexander Santiago
V3 Companies
550 Polaris Parkway, Suite 250
Westerville, Ohio 43082

Re: 26-1028_Center Bend 138kV

Project: The proposed project involves connecting the Muskingum River 138 kV transmission line to the Bit56 substation.

Location: The proposed project is located in Center and Meigsville townships, Morgan County and Waterford Township, Washington County, Ohio.

Approximate Center Coordinates: 39.5968, -81.6736

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

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

Purple Wartyback (*Cyclonaias tuberculata*), SC
Long-solid (*Fusconaia subrotunda*), E, FT
Threehorn Wartyback (*Obliquaria reflexa*), SC
Round Hickorynut (*Obovaria subrotunda*), E, FT
Sheepnose (*Plethobasus cyphus*), E, FE

Ohio Pigtoe (*Pleurobema cordatum*), E
Round Pigtoe (*Pleurobema sintoxia*), SC
Fawnsfoot (*Truncilla donaciformis*), SC
Deertoe (*Truncilla truncata*), SC

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

Of the species listed above, Long-solid, Threehorn Wartyback, Round Hickorynut, Sheepnose, Ohio Pigtoe, Round Pigtoe, and Fawnsfoot are recorded within the boundaries of the specified project area. Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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

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

The 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 species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in clusters of dead leaves on tree limbs. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cleared, the DOW recommends tree and/or tree limb clearing only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with a Diameter Breast Height (DBH) ≥ 20 " if possible. If trees are present within the project area, and trees and/or tree limbs must be cleared during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any clearing. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the [OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE \(OH-FIELD OFFICE\) JOINT GUIDANCE FOR BAT SURVEYS](#). If state-listed bats are documented, DOW recommends tree clearing only occur from October 1 through March 31. However,

limited summer tree clearing may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

For every project, the DOW also recommends that a winter bat habitat assessment is conducted to determine if potential hibernacula are present within the project area. This is to limit possible disturbances that seasonal tree clearing and/or subsurface work (e.g., trenching, blasting, etc.) may cause to hibernating bats. Potential hibernacula include rocky outcroppings, caves, and underground mines. Direction on how to conduct winter habitat assessments can be found in the joint guidance linked above. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile permanent tree clearing buffer around the hibernaculum entrance. Limited summer or winter tree clearing may be acceptable after consultation with the DOW. If a habitat assessment for projects involving subsurface disturbance finds that a potential hibernaculum is present within 5 miles of the project area, please consult with Eileen Wyza for project recommendations. If no tree clearing or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

sheepnose (*Plethobasus cyphus*)

fanshell (*Cyprogenia stegaria*)

snuffbox (*Epioblasma triquetra*)

pink mucket (*Lampsilis abrupta*)

State Endangered

long-solid (*Fusconaia subrotunda*)

elephant-ear (*Elliptio crassidens*)

butterfly (*Ellipsaria lineolata*)

Ohio pigtoe (*Pleurobema cordatum*)

pyramid pigtoe (*Pleurobema rubrum*)

sharp-ridged pocketbook (*Lampsilis ovata*)

State Threatened

Salamander Mussel (*Simpsonaias ambigua*)

This project must not have an impact on native freshwater mussels, as all mussel species in Ohio are protected under Ohio Administrative Code and Ohio Revised Code. In accordance with the 2026 Ohio Mussel Survey Protocol, full mussel surveys are required for Group 2, 2.5, 3, 4, and 4.5 streams as outlined in Appendix A. Group 1, 1.5, and unlisted streams with a watershed of five square miles or more above the point of impact can be evaluated using the Reconnaissance Survey for Unionid Mussels described in Appendix B to determine whether mussels are present, and if live or fresh dead mussels are present, a full mussel surveys will be recommended. A full mussel survey can be

conducted in Group 1, 1.5, and unlisted streams without a reconnaissance survey if desired. Surveyors must meet the qualifications specified for the applicable stream group, including OSU mussel identification certification and federal permitting for streams that likely have federal species. If any in-water work is proposed in qualifying streams or lentic (lake) waterbodies, the Division of Wildlife recommends that the applicant provide clear documentation showing that mussel impacts will not occur. If avoidance is not possible, a qualified professional malacologist should conduct a mussel survey in the project area and, if mussels cannot be avoided are present, they must be relocated to suitable upstream or otherwise appropriate habitat following the methods outlined in the 2026 Ohio Mussel Survey Protocol. Mussel surveys and any associated relocation activities must follow the protocol in full, including search structure, relocation methods, and reporting standards. If no in-water work is proposed, impacts to mussels are not likely.

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

State Endangered

goldeye (*Hiodon alosoides*)

northern madtom (*Noturus stigmosus*)

pugnose minnow (*Opsopoeodus emiliae*)

State Threatened

channel darter (*Percina copelandi*)

mountain madtom (*Noturus eleutherus*)

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

The project is also within the range of the eastern spadefoot toad (*Scaphiopus holbrookii*), a state endangered species. This species is found in areas of sandy soils that are associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions. 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 eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. If in-water work will occur in

the Muskingum River, the DOW recommends that an approved herpetologist conducts a habitat suitability survey to determine if suitable habitat is present within the project area. If suitable habitat is determined to be present; the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimization plan be developed and implemented by the approved herpetologist. A list of [approved herpetologists](#) has been provided for your convenience.

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

The Divisions of Water Resources, Forestry, and Mineral Resources Management have not conducted a project specific review and/or comments; however, the guidance provided below should be reviewed by the Environmental Review applicant for applicability on this project and subsequent compliance as applicable.

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

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

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

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

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

Forestry: The Division of Forestry recommends that construction projects preserve existing trees to the greatest extent possible. Failing to consider trees during any phase of project development (e.g. planning, design, preconstruction, construction, landscaping and/or postconstruction) can compromise tree health and structural integrity. Preserving trees during a construction project involves protecting the soil, roots, trunks, and crowns of trees. Protection barriers should be visible and extend around the root zone, the area under the tree that extends beyond the drip zone. There should be no storage of material or traffic within this established zone. Trees should be monitored throughout the project and steps taken to remedy any impacts. Projects should consider Best Management Practices (BMPs) during construction and the [Purdue Extension document Construction and Trees: Guidelines for Protection](#) is recommended as a resource for BMPs. Certified arborists can be located through the [International Society of Arboriculture website](#). Please note that tree preservation practices may also be required under municipal ordinances.

Mineral Resources: For projects requiring earth disturbance, the Ohio Mines Locator ([ODNR Mines of Ohio Viewer](#)) should be referenced. Both current and abandoned mines with either underground or surface features should be identified, and project impacts evaluated. Please reference the [Ask Before You Build](#) development guide for information about abandoned mine land features. Division of Mineral Resources Management may be contacted for further information and guidance regarding development of mined lands. Contact minerals@dnr.ohio.gov for further information.

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.*

Appendix D Ecological Survey Report



Center Bend 138kV Transmission Line Extension

Ecological Report

Project Site:

South of Township Road 915 and south of the Muskingum River
Beverly, Morgan County, Ohio

Prepared For:

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



An **AEP** Company

BOUNDLESS ENERGY™

Prepared By:

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August 2026

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EXECUTIVE SUMMARY

V3 Companies, Ltd. (V3), performed an ecological survey and report for the project which is approximately 1.1 miles and is located south of Township Road 915 and extending south to the Muskingum River, located in Center Township, Morgan County, Ohio (SITE) on 30 June 2026.

V3 reached the following conclusions based on review of available and reasonably ascertainable federal, state, and local resources, and a SITE inspection conducted on the date referenced above.

- Seven streams were identified on-SITE.
 - » The Muskingum River and ST-5-INT are likely to be considered “Waters of the U.S.” and subject to regulation by the Ohio Environmental Protection Agency (OEPA) and U.S. Army Corps of Engineers (USACE).
 - » Streams ST-4-EPH, ST-6-EPH, ST-6A-EPH, ST-6B-EPH and ST-8-EPH did not appear to be a “relatively permanent water” and will likely not be considered “Waters of the U.S.” subject to USACE and OEPA.
- One wetland was identified on-SITE.
 - » WL-9-PEM did not appear to exhibit a hydrologic connection to any federally jurisdictional “Waters of the U.S.,” and as such, WL-9-PEM would likely be subject to regulation by the OEPA alone.
- An official species list obtained from the U.S. Fish and Wildlife Service (USFWS) Information Planning and Consultation (IPaC) website indicated that the SITE is within the ranges of the federally endangered Indiana bat (*Myotis sodalis*), the federally endangered fanshell (*Cyprogenia stegaria*), the federally endangered Pink mucket (*Lampsilis abrupta*), the federally endangered Sheepnose mussel (*Plethobasus cyphus*), the federally endangered snuffbox mussel (*Epioblasma triquetra*), the federally threatened longsolid (*Fusconaia subrotunda*), the federally threatened rabbitsfoot (*Quadrula cylindrica cylindrica*), the federally threatened round hickorynut (*Obovaria subrotunda*), the federally threatened American burying beetle (*Nicrophorus americanus*) and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. V3 observed potential roost trees on-SITE at the time of the SITE reconnaissance. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside the recommended seasonal clearing dates (October 1 through March 31).
- Correspondence with the Ohio Department of Natural Resources (ODNR) indicated records of nine endangered, threatened, or rare (ETR) species or special features/areas within a one-mile radius of the SITE, seven of which were recorded within the SITE boundary. Additionally, the ODNR Division of Fish and Wildlife stated that the SITE is within the range of twenty-two ETR species. The ODNR stated that the project is not likely to impact these species if habitat is not impacted, and gave recommendations to avoid and minimize impacts to these species.

Chapter 1 Introduction

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

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

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

1.1 Introduction

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

The SITE is approximately 1.1 miles and is located south of Township Road 915 and extending approximately 1.1 miles south to the Muskingum River in Center Township, Morgan County, Ohio (**Figure 1**).

Chapter 2 Jurisdictional Resources

2.1 Wetlands

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

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

- Hydrophytic vegetation
- Hydrology
- Hydric Soil

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

Chapter 3 Desktop Review

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

3.1 United States Geological Survey 7.5-Minute Quadrangle Map

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

The SITE is situated in the Beverly, Ohio USGS 7.5-Minute Quadrangle Map, in Sections 29 and 32, Township 6 North, Range 10 West. V3 evaluated the topography and concluded that the SITE elevation ranges from approximately 700 to 900 feet above mean sea level (AMSL). Two aquatic features are mapped within the SITE area (**Figure 1**).

3.2 National Wetlands Inventory Map

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

NWI data is shown projected over aerial imagery in **Figure 2**. Two NWI features are mapped within the SITE area (**Table 1**). The presence of NWI features mapped partially or fully within the SITE area suggests the potential presence of wetlands or other regulated aquatic features on-SITE.

Table 1: NWI Classification Description

Symbol	Description	Count
PUBGx	Paulstrine, Unconsolidated Bottom, Intermittently Exposed, Excavated	1
R2UBH	Riverine, Lower Perennial, Unconsolidated Bottom, Permanently Flooded	1

3.3 Flood Insurance Rate Map

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

V3 reviewed digital National Flood Hazard Zone data for Morgan County, Ohio. The southern portion of the SITE is mapped within the 100-year floodway (**Figure 2**).

3.4 United States Department of Agriculture Soil Survey

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

Table 2: Soil Survey On-SITE

Soil Map Unit	Description	Hydric within Morgan County
GhD2	Gilpin-Upshur complex, 12 to 20 percent slopes, eroded	No
GhE2	Gilpin-Upshur complex, 20 to 35 percent slopes, eroded	No
GhF	Gilpin-Upshur complex, 35 to 70 percent slopes	No
Hay1AO	Haymond silt loam, 0 to 3 percent slopes, occasionally flooded	No
W	Water	No
WfB	Westgate silt loam, 2 to 6 percent slopes	No
WfC2	Westgate silt loam, 6 to 12 percent slopes, eroded	No

No hydric soil unit is situated within the SITE. Soils are considered hydric if more than 50 percent of the soil contains hydric components according to the NRCS Web Soil Survey. The presence of hydric soil units within the SITE area suggests appropriate wetland soils are located on-SITE.

3.5 Endangered, Threatened, and Rare Specie Evaluation

An official species list obtained from the USFWS IPaC website indicated that the SITE is within the ranges of the following federally listed species: the Indiana bat (*Myotis sodalis*, endangered); the fanshell (*Cyprogenia stegaria*, endangered); the longsolid (*Fusconaia subrotunda*, threatened); Pink mucket (*Lampsilis abrupta*, endangered); the rabbitsfoot (*Quadrula cylindrica cylindrica*, threatened); the round hickorynut (*Obovaria subrotunda*, threatened); the Sheepnose mussel (*Plethobasus cyphus*, endangered); the snuffbox mussel (*Epioblasma triquetra*, endangered); the American burying beetle (*Nicrophorus americanus*, threatened); and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species. The USFWS stated that if tree clearing cannot be avoided, then seasonal clearing shall be done to avoid adverse effects to the Indiana bats. See **Table 3** for the recommended clearing dates. A review of the ODNR bald eagle nest mapping resources indicated the nearest documented bald eagle nest near the Muskingum River, approximately 5.6 miles southwest of the SITE. A field review of the SITE and surrounding areas was also conducted during the visit, and no large stick nests or other indicators of bald eagle nesting were observed. Based on these findings, impacts to bald eagles are not anticipated. The USFWS stated the due to the project, type, size, and location, the agency does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.

Correspondence with the ODNR indicated records of nine ETR species or special features or areas within a one-mile radius of the SITE area. Additionally, the ODNR Division of Fish and Wildlife stated that the SITE is within the range of twenty-two ETR species. The ODNR stated that the project is not likely to impact these species if habitat is not impacted, and gave recommendations to avoid and minimize impacts to these species (**Table 3**).

ODNR correspondence indicated that seven species were within the SITE boundary. The state endangered, federally threatened Long-solid (*Fusconaia subrotunda*), the state threatened Threehorn wartyback (*Obliquaria*

reflexa), the state endangered, federally threatened Round hickorynut (*Obovaria subrotunda*), the state endangered, federally endangered Sheepnose (*Plethobasus cyphus*), the state endangered Ohio pigtoe (*Pleurobema cordatum*), the state species of concern Round pigtoe (*Pleurobema sintoxia*), and the state species of concern Fawnsfoot (*Truncilla donaciformis*). Due to the project location and type, these species are not likely to be impacted.

ODNR recommended a desktop habitat assessment followed by a field assessment, if needed, to identify if potential bat hibernacula are present within the Project area. V3 completed a desktop assessment including data on known abandoned or active mines and locations known or suspected of karst geology (**Figure 1A**). The desktop assessment identified multiple mine openings and abandoned underground mines within 5-miles of the SITE, none of which are mapped within a 0.25 mile radius. The ODNR recommends a 0.25-mile permanent tree clearing buffer around the hibernaculum entrance. No suitable bat hibernacula were observed during the filed reconnaissance. Coordination with ODNR Division of Wildlife is recommended if any subsurface disturbance is necessary for the project.

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

Table 3: ETR Species Table

Scientific Name	Common Name	State Listed Status	Federally Listed Status	Typical Habitat Description	Habitat Observed In Survey Area	Avoidance Dates	Agency Comment (Appendix A)	Potential Impacts
Mussels								
<i>Obovaria subrotunda</i>	Round hickorynut	Endangered	Threatened	Perennial streams	Yes	N/A	ODNR - Proposed project not likely to impact this species.	No – work in habitat not proposed
<i>Cyclonaias tuberculata</i>	Purple wartyback	State Species of Concern	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Plethobasus cyphus</i>	Sheepnose	Endangered	Endangered	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Pleurobema cordatum</i>	Ohio pigtoe	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Pleurobema sintoxia</i>	Round pigtoe	State Species of Concern	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Truncilla donaciformis</i>	Fawnsfoot	State Species of Concern	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Truncilla truncata</i>	Deertoe	State Species of Concern	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Cyprogenia stegaria</i>	Fanshell	Endangered	Endangered	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Epioblasma triquetra</i>	Snuffbox	Endangered	Endangered	Perennial streams	Yes	N/A		No –work in habitat not proposed
<i>Fusconaia subrotunda</i>	Long-solid	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Obliquaria reflexa</i>	Threehorn wartyback	Threatened	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Lampsilis abrupta</i>	Pink mucket	Endangered	Endangered	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Elliptio crassidens</i>	Elephant-ear	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Ellipsaria lineolata</i>	Butterfly	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Pleurobema rubrum</i>	Pyramid pigtoe	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Lampsilis ovata</i>	Sharp-ridged pocketbook	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed
<i>Simpsonaias ambigua</i>	Salamander Mussel	Endangered	N/A	Perennial streams	Yes	N/A		No – work in habitat not proposed

Fishes								
<i>Noturus stigmosus</i>	Northern madtom	Endangered	N/A	Perennial streams	Yes	15 March to 30 June	ODNR - Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.	No – work in habitat not proposed
<i>Hiodon alosoides</i>	Goldeye	Endangered	N/A	Perennial streams	Yes	15 March to 30 June		No – work in habitat not proposed
<i>Opsopoeodus emiliae</i>	Pugnose minnow	Endangered	N/A	Perennial streams	Yes	15 March to 30 June		No – work in habitat not proposed
<i>Percina copelandi</i>	Channel darter	Threatened	N/A	Perennial streams	Yes	15 March to 30 June		No – work in habitat not proposed
<i>Noturus eleutherus</i>	Mountain madtom	Threatened	N/A	Perennial streams	Yes	15 March to 30 June		No – work in habitat not proposed

Amphibians								
<i>Cryptobranchus alleganiensis alleganiensis</i>	Eastern hellbender	Endangered	Species of Concern	Perennial streams with large flat rocks.	Yes	N/A	ODNR – 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 – work in habitat not proposed
<i>Scaphiopus holbrookii</i>	Eastern spadefoot toad	Endangered	N/A	Areas of sandy soils associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions	No	N/A		No

Mammals								
<i>Myotis lucifugus</i>	Little brown bat	Endangered	N/A	During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees	Yes	1 April to 30 September	ODNR/USFWS - Cutting of trees is recommended between 1 October and 31 March. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between 1 June and 15 August. ODNR - If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the project area, please send this information to Erin Hazelton for project recommendations. If a potential or known hibernaculum is found, the Division of Wildlife (DOW) recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.	No - Impacts are avoided with winter tree clearing. If winter tree clearing is not feasible, presence/absence surveys may be needed.
<i>Myotis septentrionalis</i>	Northern long-eared bat	Endangered	Threatened		Yes			
<i>Myotis sodalis</i>	Indiana bat	Endangered	Endangered		Yes			
<i>Perimyotis subflavus</i>	Tricolored bat	Endangered	N/A		Yes			

Chapter 4 Site Reconnaissance

4.1 Methodology

V3 conducted a field investigation at the SITE on 30 June 2026. During this investigation, V3 noted the presumed land use of the SITE and surrounding area, and evaluated the SITE for the potential presence of wetlands, “Waters of the U.S.,” and natural resources using the findings of the desktop review and field observations. Photographs were taken during the field investigation and are provided in **Appendix B**.

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

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

4.2 Site and Adjacent Property Land Use

The 1.1-mile SITE consists of agricultural fields, fallow fields, and forested areas. Adjacent land use consists of residential properties, agricultural fields, fallow fields, and forested areas.

4.3 Wetland Summary

One wetland was identified during this investigation based upon the methodology set forth in the *1987 Manual* and the *Eastern Mountains and Piedmont Region*. Information that V3 collected at each DP on 30 June 2026 is described in the following section. This information is summarized on the forms provided in **Appendix C**. An overall SITE delineation map showing placement of the DPs is included as **Figure 4**.

4.3.1 WL-9-PEM – (0.12-acre PEM)

Wetland WL-9-PEM was situated in the northeast of structure 9 and consisted of 0.12 acres of palustrine, emergent wetland (PEM). WL-9-PEM did not appear to have a hydrologic connection with any federally jurisdictional “Waters of the U.S.,” and as such would likely be considered isolated and subject to regulation by OEPA alone.

DP WL-9

This DP was collected in the northern portion of WL-9-PEM. All three criteria were met which qualifies this area as a wetland. The dominant vegetation for each stratum present consisted of common fox sedge (*Carex vulpinoidea*, OBL, 95%). The soil profile met the redox depression (F8) indicator for hydric soil. Evidence of wetland hydrology included surface water (A1), high water table (A2), saturation (A3), geomorphic position (D2), and FAC-neutral test.

DP UPL-9

This DP was collected in the upland area adjacent to DP WL-9. This area met the soils criteria but did not meet vegetation or hydrology criteria. Since all three criteria were not met, this area does not qualify as a wetland. The

dominant vegetation for each stratum present consisted of Canadian thistle (*Cirsium arvense*, FACU, 55%) and common milkweed (*Asclepias syriaca*, FACU, 20%). The soil profile met the depleted matrix (F3) and redox depressions (F8). No indicators of wetland hydrology were observed.

4.4 Data Point Summary

Below is a description of the information collected at each additional DP during the 30 June 2026 field investigation that was not associated with an identified wetland area. The purpose of collecting these DPs was to describe the remaining characteristics of the SITE. Information that was collected at each DP is summarized on the forms provided in **Appendix C**. Their placement is depicted in **Figure 4**.

DP 4

This DP was collected south of structure 4. This area did not meet any wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of sugar maple (*Acer saccharum*, FACU, 30% tree, 80% shrub), chestnut oak (*Quercus montana*, UPL, 20%), Yellow buckeye (*Aesculus flava*, FACU, 15%), American pokeweed (*Phytolacca americana*, FACU, 15%), eastern bottle brush grass (*Elymus hystrix*, UPL, 5%), and Virginia creeper (*Parthenocissus quinquefolia*, FACU, 10%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

DP 5

This DP was collected southeast of structure 5. This area did not meet any wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of wheat (*Triticum aestivum*, UPL, 100%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

DP 6

This DP was collected south of structure 6. This area did not meet any wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of sugar maple (FACU, 35% trees, 90% shrub), sassafras (*Sassafras albidum*, FACU, 25%), Yellow buckeye (FACU, 15%), rambler rose (*Rosa multiflora*, FACU, 25%), Eastern poison ivy (*Toxicodendron radicans*, FAC, 10%), White avens (*Geum canadense*, FACU, 10%), American hog peanut (*Amphicarpaea bracteata*, FAC, 15%), and Virginia creeper (FACU, 5%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

DP 8

This DP was collected southeast of structure 8. This area met the vegetation criteria but not the hydrology or soils criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of black willow (*Sailx nigra*, OBL, 75%), ash-leaf maple (*Acer negundo*, FAC, 25%), Canada goldenrod (*Solidago canadensis*, FACU, 60%), and poison hemlock (*Conium maculatum*, FACW, 20%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

DP 10

This DP was collected north of structure 10. This area did not meet any wetland criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of tall fescue (*Lolium arundinaceum*, FACU, 65%), and cut-leaf teasel (*Dipsacus laciniatus*, FACU, 20%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

DP 13

This DP was collected east of structure 13. This area did not meet any criteria. Since all three criteria were not met, this area does not qualify as a wetland. The dominant vegetation for each stratum present consisted of corn (*Zea mays*, UPL, 100%). No indicators of hydric soils were observed. No indicators of wetland hydrology were observed.

Table 4: Delineated Wetlands Identified within the Survey Area

Wetland ID	Location		Isolated ?	Habitat Type	Delineated Area (acre)	ORAM		Proposed Impacts	
	Latitude	Longitude				Score	Category	Temporary Matting Area (acre)	Permanent Impact Area (acre)
WL-9-PEM	39.59888	-81.67039	Yes	PEM	0.12	26	1	TBD	TBD

4.5 Drainage Features, Streams, and Other Potential “Waters of the U.S.”

Seven streams and one open water body were identified during this investigation using the methods described in Chapter 2. Information that V3 collected at each feature on 30 June 2026 is described in the following section. An overall SITE delineation map is included as **Figure 4**.

4.5.1 Muskingum River – (204-linear feet, Perennial)

Muskingum River is located north of structure 3 and consisted of 204 linear feet of perennial stream within the SITE. The substrate of Muskingum River consisted of gravel, sand and silt. Analysis using StreamStats² indicated Muskingum River has a drainage area through the SITE of 7,620 square miles. Muskingum River has an average width at the OHWM of 390 feet within the SITE. Muskingum River exhibited an OHWM and will likely qualify as federally jurisdictional “Waters of the U.S.” subject to USACE and OEPA authority.

4.5.2 ST-4-EPH – (279-linear feet, Ephemeral)

ST-4-EPH is located south of structure 4 and consisted of 279 linear feet of ephemeral stream within the SITE. The substrate of ST-4-EPH consisted of boulder slabs, gravel, silt, and leaf pack. ST-4-EPH is not represented on StreamStats. ST-4-EPH has an average width at the OHWM of 4 feet within the SITE. ST-4-EPH appears to be an ephemeral stream and did not appear to be a “relatively permanent water”, therefore will likely not qualify as a federally jurisdictional “Waters of the U.S” subject to USACE and OEPA.

4.5.3 ST-5-INT – (135-linear feet, Intermittent)

ST-5-INT is located southwest of structure 5 and consisted of 135 linear feet of intermittent stream within the SITE. The substrate of ST-5-INT consisted of boulder slabs, cobble, gravel, silt, and muck. ST-5-INT is not represented on StreamStats. ST-5-INT has an average width at the OHWM of 6 feet within the SITE. ST-5-INT exhibited an OHWM and will likely qualify as federally jurisdictional “Waters of the U.S.” subject to USACE and OEPA authority.

4.5.4 ST-6-EPH – (54-linear feet, Ephemeral)

ST-6-EPH is located north of structure 6 and consisted of 54 linear feet of ephemeral stream within the SITE. The substrate of ST-6-EPH consisted of gravel, silt, and muck. ST-6-EPH is not represented on StreamStats. ST-6-EPH has an average width at the OHWM of 5 feet within the SITE. ST-6-EPH appears to be an ephemeral stream and did

² U.S. Geological Survey (USGS). "StreamStats Application." USGS StreamStats. Accessed online, July 2026. Available: <https://streamstats.usgs.gov/ss/>

not appear to be a “relatively permanent water”, therefore will likely not qualify as a federally jurisdictional “Waters of the U.S” subject to USACE and OEPA.

4.5.5 ST-6A-EPH – (179-linear feet, Ephemeral)

ST-6A-EPH is located north of structure 6 and consisted of 179 linear feet of ephemeral stream within the SITE. The substrate of ST-6A-EPH consisted of gravel, sand, silt, and muck. ST-6A-EPH is not represented on StreamStats. ST-6A-EPH has an average width at the OHWM of 5 feet within the SITE. ST-6A-EPH appears to be an ephemeral stream and did not appear to be a “relatively permanent water”, therefore will likely not qualify as a federally jurisdictional “Waters of the U.S” subject to USACE and OEPA.

4.5.6 ST-6B-EPH – (98-linear feet, Ephemeral)

ST-6B-EPH is located north of structure 6 and consisted of 98 linear feet of ephemeral stream within the SITE. The substrate of ST-6B-EPH consisted of silt and muck. ST-6B-EPH is not represented on StreamStats. ST-6B-EPH has an average width at the OHWM of 2 feet within the SITE. ST-6B-EPH did not appear to be a “relatively permanent water”, therefore will likely not qualify as a federally jurisdictional “Waters of the U.S” subject to USACE and OEPA.

4.5.7 ST-12-EPH – (54-linear feet, Ephemeral)

ST-12-EPH is located northeast of structure 12 and consisted of 54 linear feet of ephemeral stream within the SITE. The substrate of ST-12-EPH consisted of cobble, gravel, silt, and muck. ST-12-EPH is not represented on StreamStats. ST-12-EPH has an average width at the OHWM of 4 feet within the SITE. ST-12-EPH did not appear to be a “relatively permanent water”, therefore will likely not qualify as a federally jurisdictional “Waters of the U.S” subject to USACE and OEPA.

4.5.8 OW-8 – (±0.07-acre, Pond)

OW-8 is located southeast of structure 8. OW-8 appears to be an isolated, excavated pond and as such does not appear to qualify as a “Waters of the U.S” subject to regulation by the USACE.

Table 5: Delineated Stream Identified within the Survey Area

Feature	Location		Stream Type	Delineated Length (LF)	Bankfull Width (feet)	OHWM Width (feet)	Field Evaluation		
	Latitude	Longitude					Method	Score	Category / Rating / OAC Designation
Muskingum River	39.59249	-81.67832	Perennial	204	390	390	QHEI	53.5	Good
ST-4-EPH	39.59374	-81.67740	Ephemeral	279	6	4	HHEI	25	Class I Primary Headwaters
ST-5-INT	39.59475	-81.67659	Intermittent	135	12	6	HHEI	43	Class II Primary Headwaters
ST-6-EPH	39.59587	-81.67467	Ephemeral	54	4	5	HHEI	27	Class I Primary Headwaters
ST-6A-EPH	39.59595	-81.66744	Ephemeral	179	5	5	HHEI	39	Class I Primary Headwaters

ST-6B-EPH	39.59605	-81.67483	Ephemeral	98	1	1	HHEI	10	Class I Primary Headwaters
ST-12-EPH	39.60264	-81.67085	Ephemeral	54	3	4	HHEI	12	Class I Primary Headwaters

Chapter 5 Conclusions

On 30 June 2026, V3 performed a wetland delineation of the SITE located in the Beverly, Ohio USGS 7.5-Minute Quadrangle Map, in Sections 29 and 32, Township 6 North, Range 10 West.

Table 6: Aquatic Features Identified On-SITE

Feature	Feature Type	Size On-SITE
WL-9-PEM	Emergent Wetland	0.02 ac
Muskingum River	Perennial stream	204 LF
ST-4-EPH	Ephemeral Stream	279 LF
ST-5-INT	Intermittent Stream	135 LF
ST-6-EPH	Ephemeral Stream	54 LF
ST-6A-EPH	Ephemeral Stream	179 LF
ST-6B-EPH	Ephemeral Stream	98 LF
ST-12-EPH	Ephemeral Stream	54 LF
OW-8	Pond	0.7 ac

Seven streams were identified on-SITE. The Muskingum River and ST-5-INT are likely to be considered “Waters of the U.S.” and subject to regulation by the USACE and OEPA. Streams ST-4-EPH, ST-6-EPH, ST-6A-EPH, ST-6B-EPH and ST-8-EPH did not appear to be a “relatively permanent water” and will likely not be considered “Waters of the U.S” subject to USACE and OEPA.

One wetland was identified on-SITE. WL-9-PEM did not appear to exhibit a hydrologic connection to any federally jurisdictional “Waters of the U.S.,” and as such, WL-9-PEM would likely be subject to regulation by the OEPA alone.

An official species list obtained from the U.S. Fish and Wildlife Service (USFWS) Information Planning and Consultation (IPaC) website indicated that the SITE is within the ranges of the federally endangered Indiana bat (*Myotis sodalis*), the federally endangered fanshell (*Cyprogenia stegaria*), the federally endangered Pink mucket (*Lampsilis abrupta*), the federally endangered Sheepsnose mussel (*Plethobasus cyphus*), the federally endangered snuffbox mussel (*Epioblasma triquetra*), the federally threatened longsolid (*Fusconaia subrotunda*), the federally threatened rabbitsfoot (*Quadrula cylindrica cylindrica*), the federally threatened round hickorynut (*Obovaria subrotunda*), the federally threatened American burying beetle (*Nicrophorus americanus*) and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. V3 observed potential roost trees on-SITE at the time of the SITE reconnaissance. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside the recommended seasonal clearing dates (October 1 through March 31).

Correspondence with the Ohio Department of Natural Resources (ODNR) indicated records of nine endangered, threatened, or rare (ETR) species or special features/areas within a one-mile radius of the SITE, seven of which were recorded within the SITE boundary. Additionally, the ODNR Division of Fish and Wildlife stated that the SITE is within the range of twenty-two ETR species. The ODNR stated that the project is not likely to impact these species if habitat is not impacted, and gave recommendations to avoid and minimize impacts to these species.

Figures

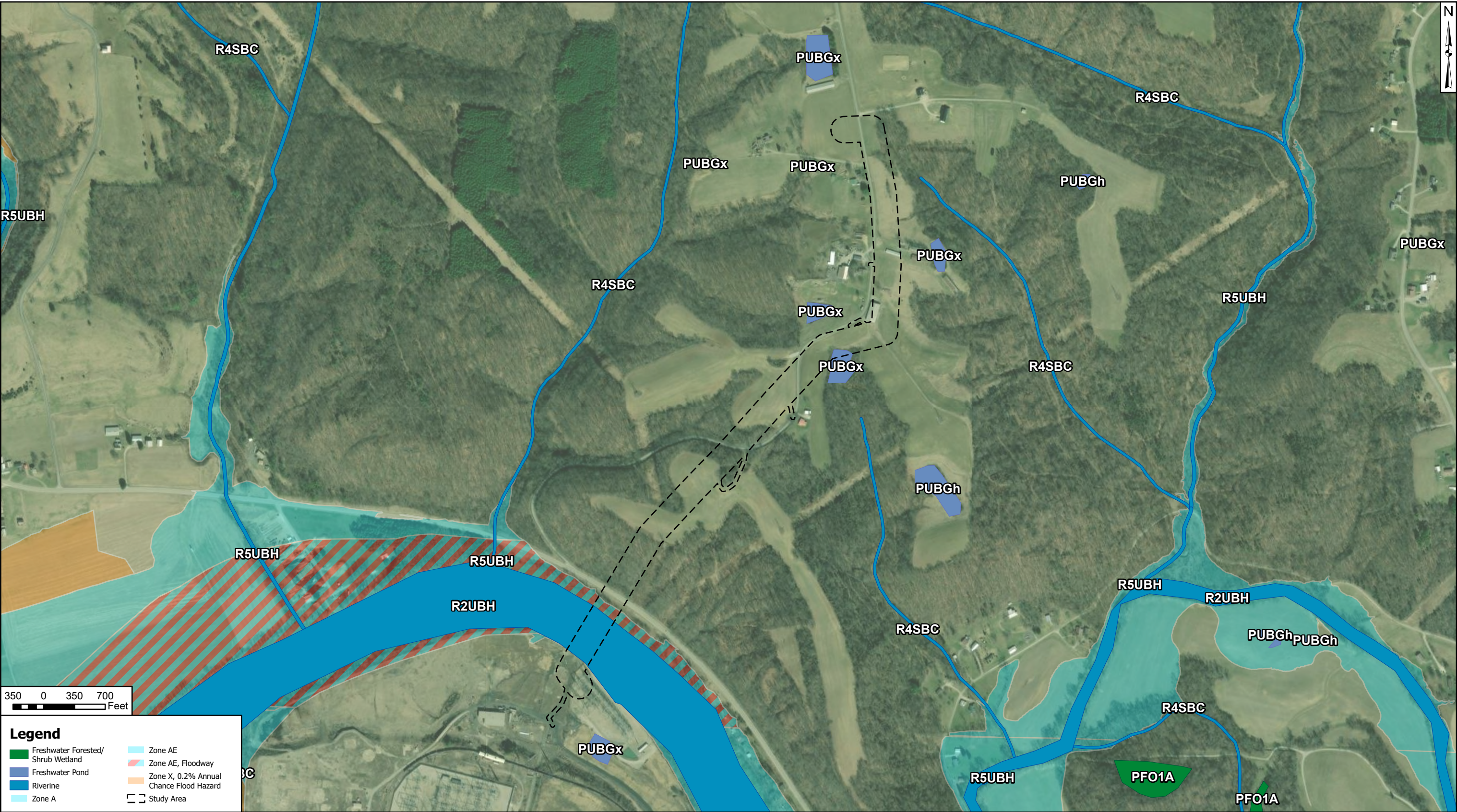
V3



500 0 500 1,000
Feet

Legend
Study Area

 V3 Companies 1060 N Capitol Avenue Suite 6-301 Indianapolis, IN 46204 317.423.0690 phone www.v3co.com Go beyond limits	PROJECT NO.: 210180.234A	CLIENT: American Electric Power 8600 Smiths Mill Road New Albany, Ohio 43054 BASE LAYER: USGS Topographic Map	SITE: Center Bend 138 kV Transmission Line Extension Morgan County, Ohio	TITLE: PROJECT LOCATION MAP	FIGURE: 1
	CREATED BY: AJS				
	DATE: 06/16/2026				
	SCALE: See Scale Bar				



Freshwater Forested/
Shrub Wetland

Freshwater Pond

Riverine

Zone A

Zone AE

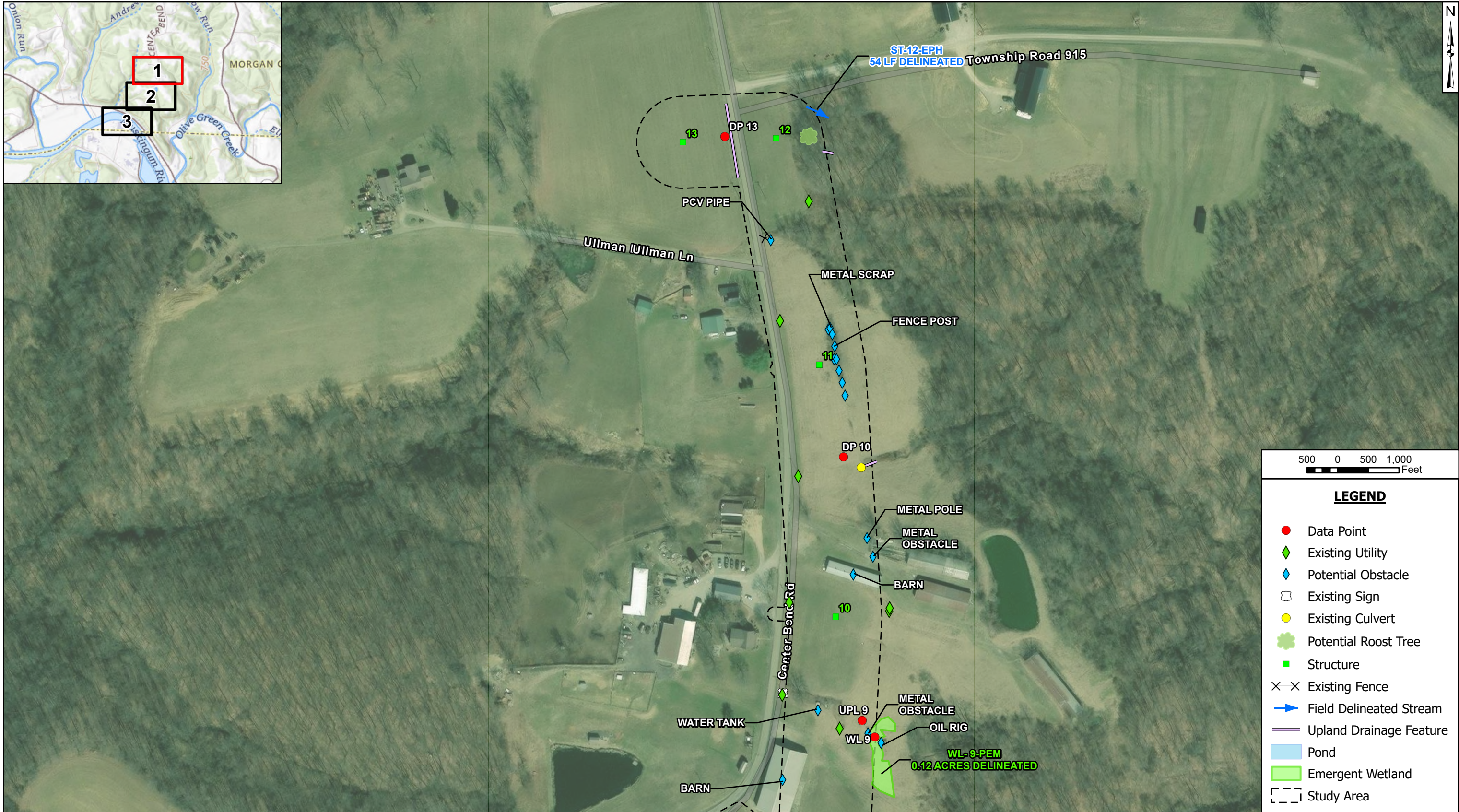
Zone AE, Floodway

Zone X, 0.2% Annual
Chance Flood Hazard

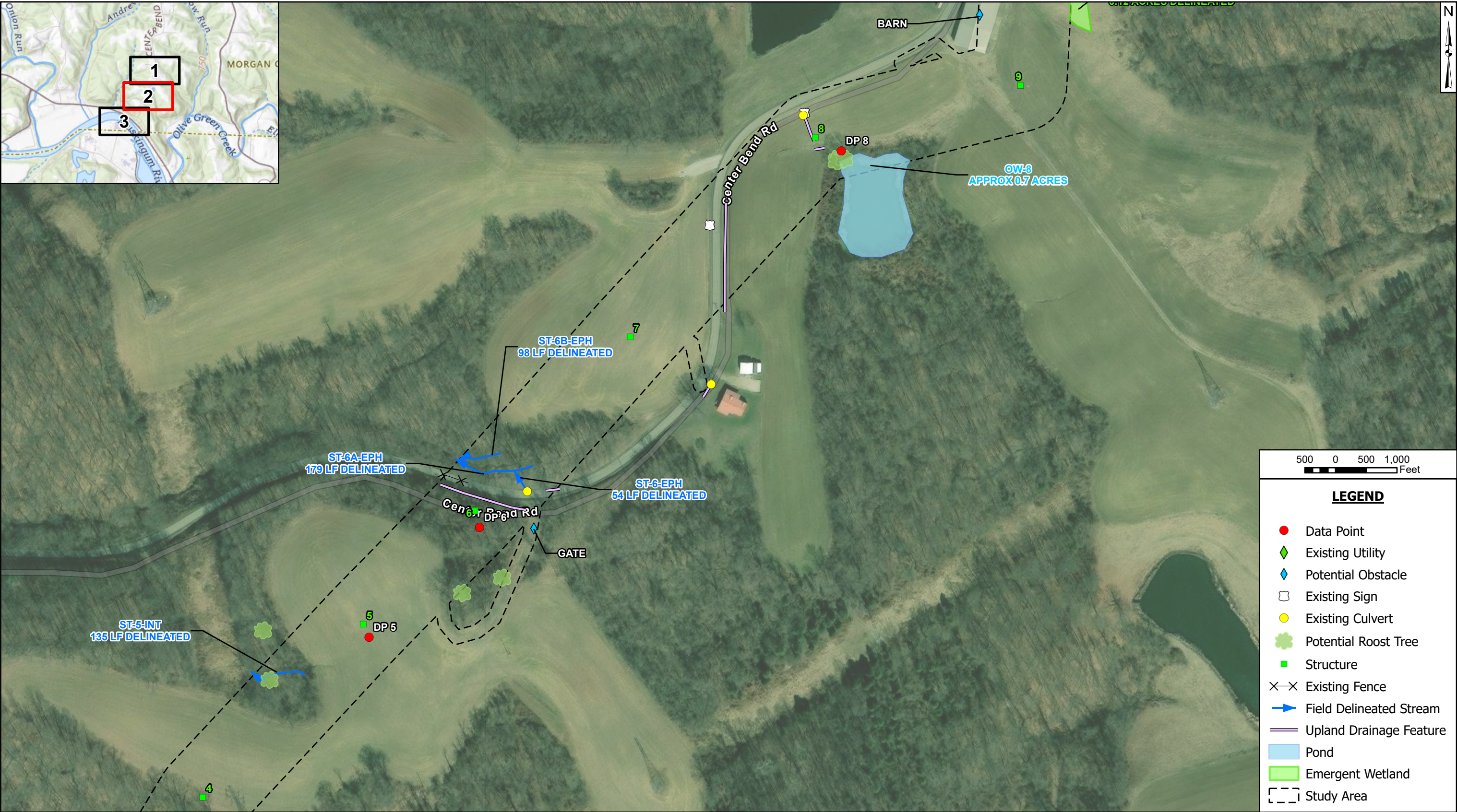
Study Area

3 V3 Companies 1060 N Capitol Avenue Suite 6-301 Indianapolis, IN 46204 317.423.0690 phone www.v3co.com Go beyond limits	PROJECT NO.: 210180.234A		CLIENT: American Electric Power 8600 Smiths Mill Road New Albany, Ohio 43054	SITE: Center Bend 138 kV Transmission Line Extension Morgan County, Ohio	TITLE: NATIONAL WETLANDS INVENTORY (NWI) & FLOOD ZONES OF OHIO MAP	FIGURE: 2				
	CREATED BY: AJS									
	DATE: 06/16/2026									
	SCALE: See Scale Bar									
		BASE LAYER: ESRI World Imagery (2025)								

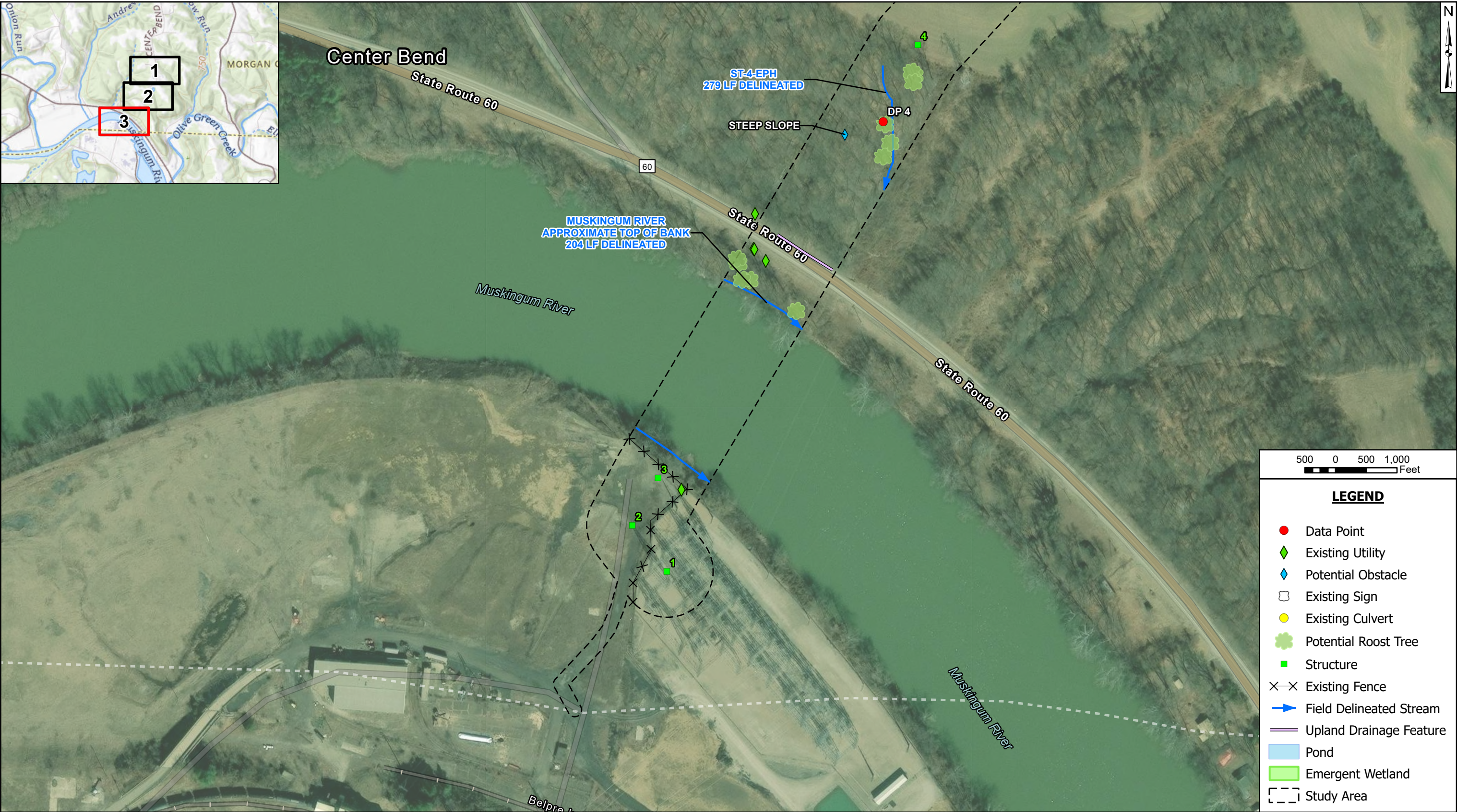
J:\2021\210180_2XX\210180_234_Bit56\210180.234A Center Bend 138kV\NR\Projects\DD_CenterBend_138kV\DD_Center_Bend\DD_Center_Bend.aprx



 V3 Companies 1060 N Capitol Avenue Suite 6-301 Indianapolis, IN 46204 317.423.0690 phone www.v3co.com	PROJECT NO.: 210180.234A	CLIENT: American Electric Power 8600 Smiths Mill Road New Albany, Ohio 43054	SITE: Center Bend 138 kV Transmission Line Extension Morgan County, Ohio	TITLE: DELINEATION MAP	FIGURE: Figure 4 Sheet 1 of 3
	CREATED BY: AJS				
	DATE: 07/24/2026	BASE LAYER: ESRI World Imagery (2025)			
	SCALE: See Scale Bar				
Go beyond limits					



 V3 Companies 1060 N Capitol Avenue Suite 6-301 Indianapolis, IN 46204 317.423.0690 phone www.v3co.com	PROJECT NO.: 210180.234A		CLIENT: American Electric Power 8600 Smiths Mill Road New Albany, Ohio 43054	SITE: Center Bend 138 kV Transmission Line Extension Morgan County, Ohio	TITLE: DELINEATION MAP	FIGURE: Figure 4 Sheet 2 of 3
	CREATED BY: AJS					
	DATE: 07/24/2026		BASE LAYER: ESRI World Imagery (2025)			
	SCALE: See Scale Bar					
Go beyond limits						



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	SCALE: See Scale Bar					
Go beyond limits						

Appendix A

ETR Species Correspondence Letters

V3



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

Phone: (614) 416-8993 Fax: (614) 416-8994



In Reply Refer To:

06/12/2026 16:13:08 UTC

Project Code: 2026-0102629

Project Name: Center Bend 138kV Transmission Line Extension Project

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

To Whom It May Concern:

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

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

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

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

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

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

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

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

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

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

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Requests for additional technical assistance or consultation from the Ohio Field Office should be submitted following guidance on the following page <https://www.fws.gov/office/ohio-ecological-services/request-project-review>. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

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

This species list is provided by:

Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
(614) 416-8993

PROJECT SUMMARY

Project Code: 2026-0102629
Project Name: Center Bend 138kV Transmission Line Extension Project
Project Type: Distribution Line - Maintenance/Modification - Above Ground
Project Description: involves connecting approximately 1.1 miles of the Muskingum River 138 kV transmission Line to the Bit56 substation.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.5967285,-81.67381592394199,14z>



Counties: Morgan County, Ohio

ENDANGERED SPECIES ACT SPECIES

There is a total of 10 threatened, endangered, or candidate species on this species list.

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

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

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

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

MAMMALS

NAME	STATUS
Indiana bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered

CLAMS

NAME	STATUS
Fanshell <i>Cyprogenia stegaria</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4822	Endangered
Longsolid <i>Fusconaia subrotunda</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9880	Threatened
Pink mucket (pearlymussel) <i>Lampsilis abrupta</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7829	Endangered
Rabbitsfoot <i>Quadrula cylindrica cylindrica</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5165	Threatened
Round hickorynut <i>Obovaria subrotunda</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9879	Threatened
Sheepnose Mussel <i>Plethobasus cyphus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6903	Endangered
Snuffbox mussel <i>Epioblasma triquetra</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4135	Endangered

INSECTS

NAME	STATUS
American burying beetle <i>Nicrophorus americanus</i> Population: Wherever found, except where listed as an experimental population No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/66	Threatened
Monarch butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

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

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

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Alex Santiago
Address: 550 Polaris Parkway
Address Line 2: Suite 250
City: WEsterville
State: OH
Zip: 43082
Email: asantiago@v3co.com
Phone: 6145708835



**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

July 22, 2026

Alexander Santiago
V3 Companies
550 Polaris Parkway, Suite 250
Westerville, Ohio 43082

Re: 26-1028_Center Bend 138kV

Project: The proposed project involves connecting the Muskingum River 138 kV transmission line to the Bit56 substation.

Location: The proposed project is located in Center and Meigsville townships, Morgan County and Waterford Township, Washington County, Ohio.

Approximate Center Coordinates: 39.5968, -81.6736

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

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

Purple Wartyback (*Cyclonaias tuberculata*), SC
Long-solid (*Fusconaia subrotunda*), E, FT
Threehorn Wartyback (*Obliquaria reflexa*), SC
Round Hickorynut (*Obovaria subrotunda*), E, FT
Sheepnose (*Plethobasus cyphus*), E, FE

Ohio Pigtoe (*Pleurobema cordatum*), E
Round Pigtoe (*Pleurobema sintoxia*), SC
Fawnsfoot (*Truncilla donaciformis*), SC
Deertoe (*Truncilla truncata*), SC

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

Of the species listed above, Long-solid, Threehorn Wartyback, Round Hickorynut, Sheepnose, Ohio Pigtoe, Round Pigtoe, and Fawnsfoot are recorded within the boundaries of the specified project area. Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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

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

The 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 species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in clusters of dead leaves on tree limbs. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cleared, the DOW recommends tree and/or tree limb clearing only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with a Diameter Breast Height (DBH) ≥ 20 " if possible. If trees are present within the project area, and trees and/or tree limbs must be cleared during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any clearing. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the [OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE \(OH-FIELD OFFICE\) JOINT GUIDANCE FOR BAT SURVEYS](#). If state-listed bats are documented, DOW recommends tree clearing only occur from October 1 through March 31. However,

limited summer tree clearing may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

For every project, the DOW also recommends that a winter bat habitat assessment is conducted to determine if potential hibernacula are present within the project area. This is to limit possible disturbances that seasonal tree clearing and/or subsurface work (e.g., trenching, blasting, etc.) may cause to hibernating bats. Potential hibernacula include rocky outcroppings, caves, and underground mines. Direction on how to conduct winter habitat assessments can be found in the joint guidance linked above. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile permanent tree clearing buffer around the hibernaculum entrance. Limited summer or winter tree clearing may be acceptable after consultation with the DOW. If a habitat assessment for projects involving subsurface disturbance finds that a potential hibernaculum is present within 5 miles of the project area, please consult with Eileen Wyza for project recommendations. If no tree clearing or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

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

Federally Endangered

sheepnose (*Plethobasus cyphus*)

fanshell (*Cyprogenia stegaria*)

snuffbox (*Epioblasma triquetra*)

pink mucket (*Lampsilis abrupta*)

State Endangered

long-solid (*Fusconaia subrotunda*)

elephant-ear (*Elliptio crassidens*)

butterfly (*Ellipsaria lineolata*)

Ohio pigtoe (*Pleurobema cordatum*)

pyramid pigtoe (*Pleurobema rubrum*)

sharp-ridged pocketbook (*Lampsilis ovata*)

State Threatened

Salamander Mussel (*Simpsonaias ambigua*)

This project must not have an impact on native freshwater mussels, as all mussel species in Ohio are protected under Ohio Administrative Code and Ohio Revised Code. In accordance with the 2026 Ohio Mussel Survey Protocol, full mussel surveys are required for Group 2, 2.5, 3, 4, and 4.5 streams as outlined in Appendix A. Group 1, 1.5, and unlisted streams with a watershed of five square miles or more above the point of impact can be evaluated using the Reconnaissance Survey for Unionid Mussels described in Appendix B to determine whether mussels are present, and if live or fresh dead mussels are present, a full mussel survey will be recommended. A full mussel survey can be

conducted in Group 1, 1.5, and unlisted streams without a reconnaissance survey if desired. Surveyors must meet the qualifications specified for the applicable stream group, including OSU mussel identification certification and federal permitting for streams that likely have federal species. If any in-water work is proposed in qualifying streams or lentic (lake) waterbodies, the Division of Wildlife recommends that the applicant provide clear documentation showing that mussel impacts will not occur. If avoidance is not possible, a qualified professional malacologist should conduct a mussel survey in the project area and, if mussels cannot be avoided are present, they must be relocated to suitable upstream or otherwise appropriate habitat following the methods outlined in the 2026 Ohio Mussel Survey Protocol. Mussel surveys and any associated relocation activities must follow the protocol in full, including search structure, relocation methods, and reporting standards. If no in-water work is proposed, impacts to mussels are not likely.

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

State Endangered

goldeye (*Hiodon alosoides*)

northern madtom (*Noturus stigmosus*)

pugnose minnow (*Opsopoeodus emiliae*)

State Threatened

channel darter (*Percina copelandi*)

mountain madtom (*Noturus eleutherus*)

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

The project is also within the range of the eastern spadefoot toad (*Scaphiopus holbrookii*), a state endangered species. This species is found in areas of sandy soils that are associated with river valleys. Breeding habitats may include flooded agricultural fields or other water holding depressions. 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 eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. If in-water work will occur in

the Muskingum River, the DOW recommends that an approved herpetologist conducts a habitat suitability survey to determine if suitable habitat is present within the project area. If suitable habitat is determined to be present; the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimization plan be developed and implemented by the approved herpetologist. A list of [approved herpetologists](#) has been provided for your convenience.

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

The Divisions of Water Resources, Forestry, and Mineral Resources Management have not conducted a project specific review and/or comments; however, the guidance provided below should be reviewed by the Environmental Review applicant for applicability on this project and subsequent compliance as applicable.

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

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

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

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

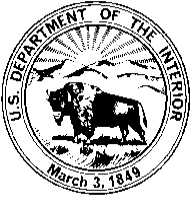
If the project does not involve activities that are subject to water withdrawal regulatory requirements as described above, then no further action is required. For more information, visit the [Water Inventory & Planning website](#).

Forestry: The Division of Forestry recommends that construction projects preserve existing trees to the greatest extent possible. Failing to consider trees during any phase of project development (e.g. planning, design, preconstruction, construction, landscaping and/or postconstruction) can compromise tree health and structural integrity. Preserving trees during a construction project involves protecting the soil, roots, trunks, and crowns of trees. Protection barriers should be visible and extend around the root zone, the area under the tree that extends beyond the drip zone. There should be no storage of material or traffic within this established zone. Trees should be monitored throughout the project and steps taken to remedy any impacts. Projects should consider Best Management Practices (BMPs) during construction and the [Purdue Extension document Construction and Trees: Guidelines for Protection](#) is recommended as a resource for BMPs. Certified arborists can be located through the [International Society of Arboriculture website](#). Please note that tree preservation practices may also be required under municipal ordinances.

Mineral Resources: For projects requiring earth disturbance, the Ohio Mines Locator ([ODNR Mines of Ohio Viewer](#)) should be referenced. Both current and abandoned mines with either underground or surface features should be identified, and project impacts evaluated. Please reference the [Ask Before You Build](#) development guide for information about abandoned mine land features. Division of Mineral Resources Management may be contacted for further information and guidance regarding development of mined lands. Contact minerals@dnr.ohio.gov for further information.

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



July 14, 2026

Project Code: 2026-0102629

Dear Ms. Speckman:

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

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Bridges and culverts have also been used as roosts. Additionally, northern long-eared bats have been observed roosting in other human-made structures, such as buildings, barns, 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 Restrictions for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. If bridges or culverts will be impacted, we recommend reviewing Appendix K in the most recent "Range-Wide Indiana Bat & Northern Long-Eared Bat Survey Guidelines" to determine if the bridge/culvert may be suitable roost habitat. We recommend impacts to suitable bridges and culverts only occur from October 1 and March 31. These seasonal restrictions are recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

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

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

On December 12, 2024 the Service proposed to list the monarch butterfly (*Danaus plexippus plexippus*) as threatened under the ESA. Monarch butterflies are found throughout Ohio and some populations migrate vast distances across multiple generations each year. Many monarchs fly between the U.S., Mexico and Canada – a journey of over 3,000 miles. Monarch populations have declined significantly in recent years. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar's sole food source – and mortality resulting from pesticide use. The Service recommends the following actions to maintain habitat and avoid impacts to monarchs in Ohio: revegetate disturbed areas with native plant species including nectar-producing plants and milkweed endemic to the area; limit mowing monarch habitat from March 15 to August 31 when monarchs are breeding and from September 1 to October 31 when large numbers of monarchs are migrating; and avoid the use of pesticides and herbicides in and near monarch habitat.

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.

Bald Eagle: The project is in the range of the bald eagle (*Haliaeetus leucocephalus*), which is protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). We recommend that you visit <https://ohiodnr.gov/discover-and-learn/animals/birds/bald-eagle> to determine if the project is within 0.5 mile of a documented eagle nest. Additionally, because not all eagle nests in the state have been mapped, we recommend that an on-site examination be conducted to determine if any large stick nests are visible from project area. If the project is within 0.5 mile of a documented eagle nest or the on-site examination reveals the presence of a potential eagle nest, we

recommend visiting <https://www.fws.gov/story/do-i-need-eagle-take-permit> to determine if an eagle take permit is required.

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

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

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, 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 B

SITE Photographs

V3

Project Name: Center Bend

Site Photographs

WL-9-PEM



Photo 1

WL-9-PEM

Wetland



Photo 2

WL-9-PEM

Wetland



Photo 3

WL-9-PEM

Wetland



Photo 4

WL-9-PEM

Wetland

UPL-9



Photo 5

UPL-9

Upland



Photo 6

UPL-9

Upland

DP-4



Photo 7

DP-4

Upland



Photo 8

DP-4

Upland

DP-5



Photo 9

DP-5

Upland



Photo 10

DP-5

Upland

DP-6



Photo 11

DP-6

Upland



Photo 12

DP-6

Upland

DP-8



Photo 13

DP-8

Upland



Photo 14

DP-8

Upland

DP-10



Photo 15

DP-10

Upland



Photo 16

DP-10

Upland

Muskingun River



Photo 17

Muskingun River Downstream



Photo 18

Muskingun River Upstream

ST-4-EPH



Photo 19

ST-4-EPH Upstream



Photo 20

ST-4-EPH Downstream

ST-5-INT

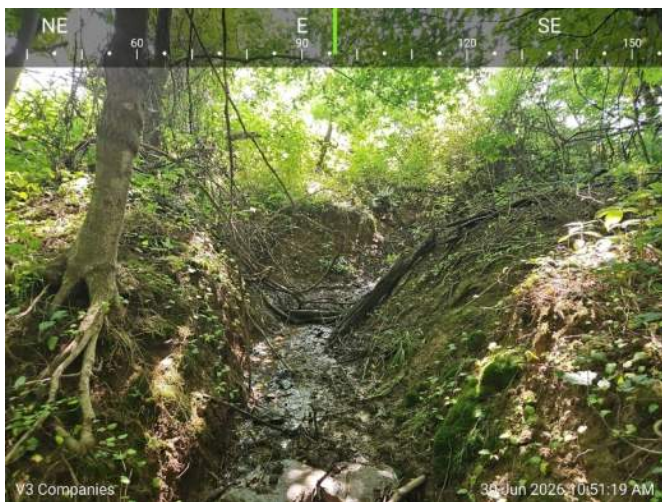


Photo 21

ST-5-INT Upstream

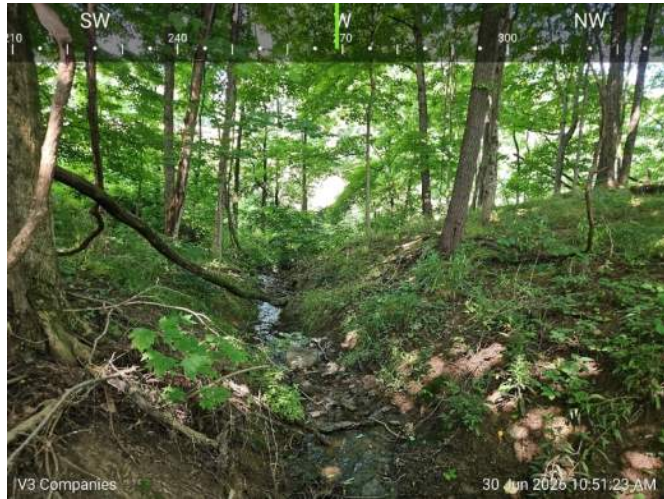


Photo 22

ST-5-INT Downstream

ST-6-EPH



Photo 23

ST-6-EPH Downstream



Photo 24

ST-6-EPH Upstream

ST-6A-EPH



Photo 25

ST-6A-EPH Upstream



Photo 26

ST-6A-EPH Downstream

ST-6B-EPH



Photo 27

ST-6B-EPH Upstream



Photo 28

ST-6B-EPH Downstream

ST-12-EPH



Photo 29

ST-12-EPH Upstream



Photo 30

ST-12-EPH Downstream

Pond-8

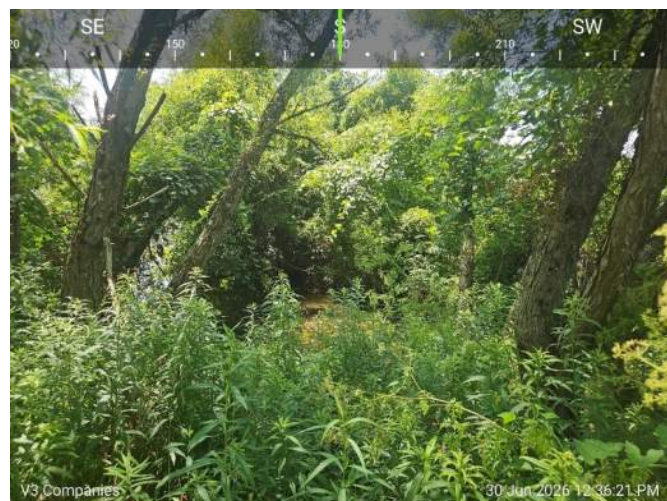


Photo 31

Pond-8

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in

Case No(s). 26-0963-EL-BLN

Summary: Application Letter of Notification for Center Bend electronically filed by
Jared M Klaus on behalf of Ohio Power Company.