Letter of Notification for the Rammel 138 kV Station and Rammel 138 kV Extension No. 1 & No. 2 Project

PUCO Case No. 26-0557-EL-BLN

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

Submitted by:
AEP Ohio Transmission Company, Inc.

May 13, 2026

LETTER OF NOTIFICATION

AEP Ohio Transmission Company, Inc.

Rammel 138 kV Station and Rammel 138 kV Extension No. 1 and No. 2 Project

4906-6-05 Accelerated Application Requirements

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

4906-6-05(B) General Information

B(1) Project Description

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

The Company is proposing the Rammel 138 kV Station and Rammel 138 kV Extension No. 1 & No. 2 Project (the "Project"), located in Dodson Township, Highland County, Ohio. The purpose of the Project is to provide interconnection service to Palomino Solar, LLC, an Independent Power Producer (IPP). The Project has been assigned PJM Queue Numbers AG1-107 and AF2-440. The 138 kV Rammel Station will be approximately 1.1 acres and receive looped service from the Hillsboro-Clinton 138 kV transmission line located immediately north and east of the station site via Rammel 138 kV Extension No. 1 and No. 2 transmission lines. Two structures will be added and one structure replaced to cut into the Hillsboro-Clinton 138 kV transmission line. No new right-of-way will be required for the cut-in structures. The transmission line extensions are both less than 0.2 miles long. An approximately 0.1-mile 138 kV generation tie line between the Rammel Station and the IPP's station will also be required and is included in this application. Rammel Station and portions of the transmission lines will be built on land owned by the IPP that will be transferred to the Company. The IPP will grant easements to the Company for the remaining portions of the transmission lines on their overall property. No easements from landowners other than the Company or IPP will be required. The location of the Project is shown on **Figure 1 and Figure 2** of **Appendix A**.

The Project meets the requirements for a LON because it is within the types of projects defined by item 3 of Ohio Administrative Code Section 4906-1-01 Appendix A of the Application Requirement Matrix for Election Power Transmission Lines, with items 1(d)(i) and 2(a) applicable to the transmission line cut-in and extensions:

(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:

(i) The line is completely on the property owned by the specific customer or the applicant.

(2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing transmission line, or replacing structures with a different type of structure, for a distance of:

(a) Two miles or less

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

The Project has been assigned Case No. 26-0557-EL-BLN.

B(2) Statement of Need

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

The Palomino Solar IPP plans to build a 200 MW solar generating facility in Highland County, Ohio. As part of the AF2-440 and AG1-107 IPP Interconnection Service Agreement, the Company will construct Rammel Station. The AF2-440 project consists of a solar generating facility with a Maximum Facility Output (MFO) of 50 MW and a capacity of 25 MW, while the AG1-107 project comprises a solar generating facility with a 150 MW MFO and 85.7 MW capacity, both located in Highland County, Ohio. In addition, the Company, will be required to modify the Hillsboro (AEP) – Hutchings (DP&L) 138 kV circuit (Hillsboro-Clinton 138 kV Transmission Line) by installing two less than 0.2 mile long 138 kV transmission lines to connect the proposed Rammel Station and installing a less than 0.1 mile long 138 kV generation tie line between Rammel Station and the customer's station. Advanced transmission technologies were not considered for this project. The purpose of the project is simply to provide an interconnection to the IPP, and the IPP is paying for the interconnection. Moreover, the Board has confirmed that advanced transmission technology requirements do not apply to gen-tie lines such as the tie line being proposed as part of this Project.

Failure to move forward with the proposed Project will result in the Company's inability to serve the customer's generation interconnection request, thereby jeopardizing the customer's required in-service date per the FERC approved Interconnection Service Agreement.

The Project is assigned to the PJM Network upgrade numbers n8833, n8834, n8835, n8837, n8838, & n8839. The Project was not included in the Company's 2026 Long Term Forecast Report (LTFR) because the solution was not known at the time of filing.

B(3) Project Location

Provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

The location of the Project in relation to existing transmission lines and substations is shown on **Figure 1**, in **Appendix A**.

B(4) Alternatives Considered

Describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility, including but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The Project is located on land currently owned by the IPP. Based on the IPP's proposed development and existing facilities in the area, the proposed location is the most suitable and least impactful for the Project. Other alternatives would require impacting neighboring properties and would add additional transmission length to the associated projects without any additional benefit. No impacts to wetlands, streams, or cultural resources or tree clearing are anticipated. Therefore, this alternative represents the most suitable location and is the most appropriate solution for meeting the Company and IPP's needs in the area.

B(5) Public Information Program

Describe its public information program to inform affected property owners and residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

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

B(6) Construction Schedule

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

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

B(7) Area Map

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

Figure 1 in **Appendix A**, identifies the location of the Project area on a United States Geological Survey 1:24,000 topographic map of the Lynchburg, Ohio quadrangle. **Figure 2** in **Appendix A** displays the Project components on a 2023 aerial photograph.

B(8) Property Agreements

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

A list of properties required for the Project are provided in **Table 1**, below.

Table 1 – Property Agreements

Property Parcel Number	Agreement Type	Easement or Option Obtained (Yes/No)
09-08-000-273.00	IPP Property Rammel Station portion to be transferred to Company. Easements to be granted for remaining portions of transmission lines.	No. To be obtained prior to construction.

B(9) Technical Features

Describe the following information regarding the technical features of the project:

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

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

Substation

1 – 16x27ft Drop-in Control Module
3 – 138kV Circuit Breakers

Transmission Lines

The transmission lines are estimated to include the following:

Hillsboro-Clinton Cut-in
Voltage: 138kV
Conductors: (3) 1033.5 kcmil 54/7 ACSR "Curlew"
Static Wire: (2) .646 OPGW
Insulators: Polymer
ROW Width: 100 feet
Structure Type: Two (2) single circuit, steel three-pole dead ends
One (1), single circuit, steel monopole with davit arm suspension

Rammel Extensions No. 1 and No. 2
Voltage: 138kV
Conductors: (3) 1033.5 kcmil 54/7 ACSR "Curlew"
Static Wire: (1) .646 OPGW and (1) 7#8 Alumoweld
Insulators: Polymer
ROW Width: 100 feet
Structure Type: Two (2) single circuit, steel H-frame suspension

Rammel-Palomino Solar Tie Line
Voltage: 138kV
Conductors: *(3) 795 kcmil 26/7 ACSR "Drake"*
Static Wire: *(2) .646 OPGW*
Insulators: Polymer
ROW Width: 100 feet
Structure Type: 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 proposed Project, which is comprised of applicable tangible and capital costs, is approximately $13,100,000 based on a Class 3 estimate. The costs for this Project will be recovered through total reimbursement by the IPP.

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 is in an area of agricultural use, primarily for row crops, with scattered residences in the vicinity. Significant portions of the vicinity have been optioned for construction of a solar generation facility. An aerial photograph of the Project vicinity is provided as **Figure 2**. The Project is mapped within Dodson Township in Highland County. No tree clearing is anticipated as part of the Project.

B(10)(b) Agricultural Land

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

The Project Area is agricultural land planned for development of a solar generation facility. The dominant agricultural use appears to be row crops (i.e. soybeans and corn). Eight acres of agricultural land will be transferred from the IPP to the Company for the Project and will be converted from agricultural use.

Based on communication with the Highland County Auditor's office on April 10, 2026, there are no agricultural district parcels or Ohio Department of Agricultural easements within the potential disturbance area of the Project.

B(10)(c) Archaeological and Cultural Resources

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

A cultural resource survey and report were conducted by the Company's consultant for the Rammel Station and the 138 kV extensions in March 2026. Correspondence from the State Historic Preservation Office ("SHPO") was received in April 2026, see **Appendix B**. The SHPO stated that that the Project will have no adverse effect on historic properties and that no further archaeological work is necessary.

B(10)(d) Local, State, and Federal Agency Correspondence

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

A summary of anticipated permits and authorizations for the Project is provided in the **Table 2**, below. There are no other known local, state, or federal requirements that must be met prior to commencement of the Project.

Table 2 – Anticipated Permits

Permit/Authorization/Coordination	Agency	Date
General Permit OHCOOO6 (Storm Water Pollution Prevention Plan)	Ohio Environmental Protection Agency	Expected Summer 2026
Notice Criteria	Federal Aviation Administration	Coordination complete 4/21/2026. Not required to file notice with FAA.
Temporary Construction Entrance and Township Road Crossing Permits	Dodson Township	Expected Summer 2026
Clean Water Act Section 404/401	United States Army Corps of Engineers	Not Applicable
	Ohio Environmental Protection Agency	
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete for Rammel Station and 138 kV Extensions 4/7/2026. No additional work required.
Threatened and Endangered Species	United States Fish and Wildlife Service	Consultation complete 2/11/2026
Threatened and Endangered Species	Ohio Department of Natural Resources	Consultation complete 3/4/2026

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.

As part of the ecological study completed for the Project, coordination letters were submitted to the United State Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review of the Project for potential impacts to state and/or federally protected species. USFWS and ODNR provided responses on February 11, 2026 and March 4, 2026, respectively. Copies of the agencies' responses are presented in **Appendix B**.

Table 3 in **Appendix C** provides the full evaluation of the federal and state threatened or endangered species for the Project area.

No tree clearing is proposed. Based on the nature of the proposed Project activities and habitat characteristics of the surrounding vicinity, construction impacts to protected species are not anticipated.

B(10)(f) Areas of Ecological Concern

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

The Company's consultant conducted an ecological survey in the Project study area on March 11, 2026, and prepared Ecological Survey Reports for the Project (**Appendix C**). The survey of the Project area identified one intermittent stream. No wetlands or ponds were delineated during survey. The Project construction activities are not expected to result in discharge of fill in any streams or wetlands.

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 number 39071C0210E). Based

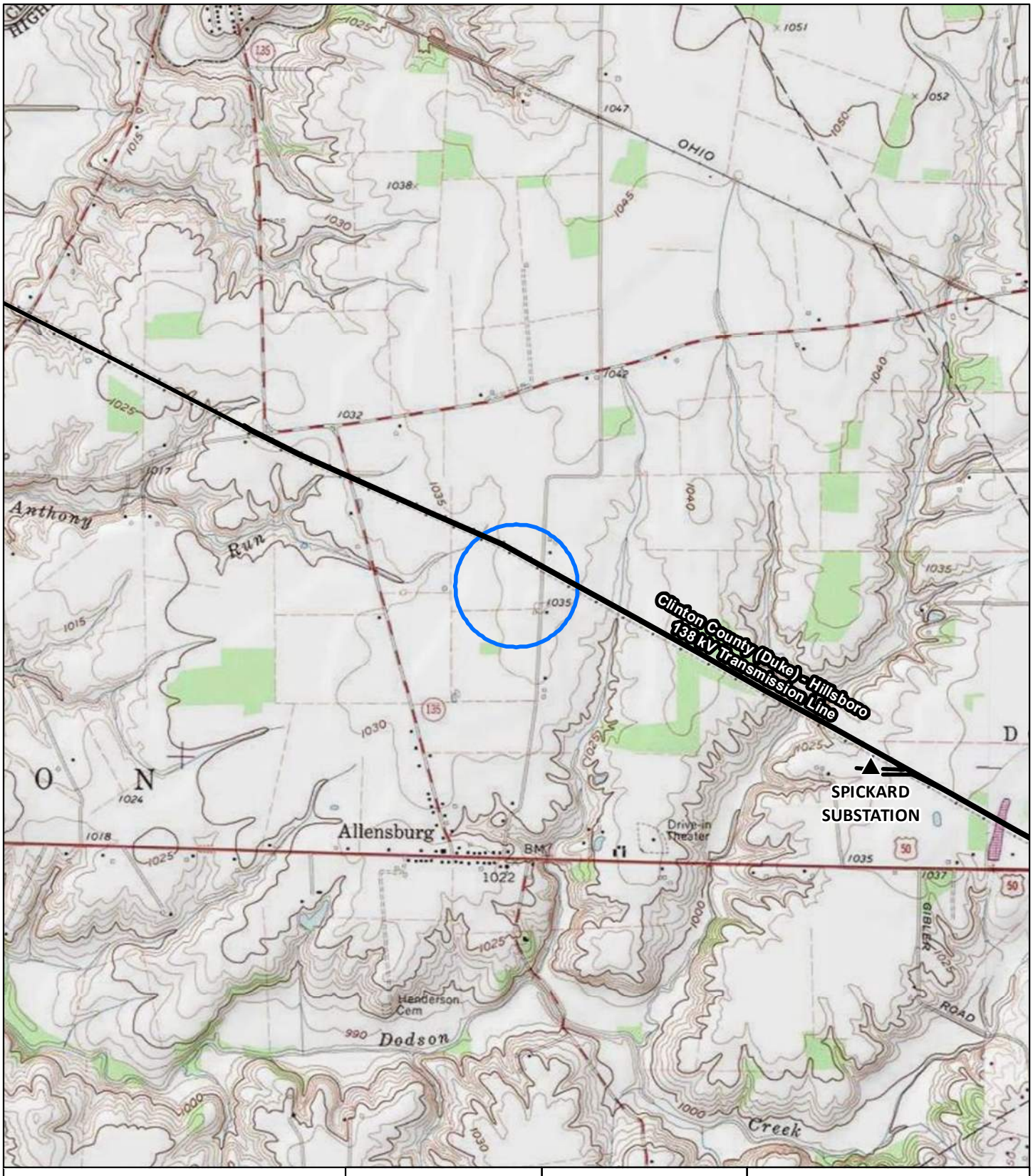
on this mapping, no FEMA-designated 100-year floodplains are mapped across the Project's areas of disturbance. No floodplain permitting is necessary.

B(10)(g) Unusual Conditions

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

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

Appendix A Project Maps



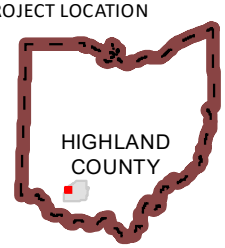
Project
Existing Transmission Line
Existing Station

Data Sources:
ESRI USA Topographic Maps
Lynchburg, Ohio

Ohio State Plane South
NAD 1983

April 29, 2026

PROJECT LOCATION



HIGHLAND COUNTY, OHIO

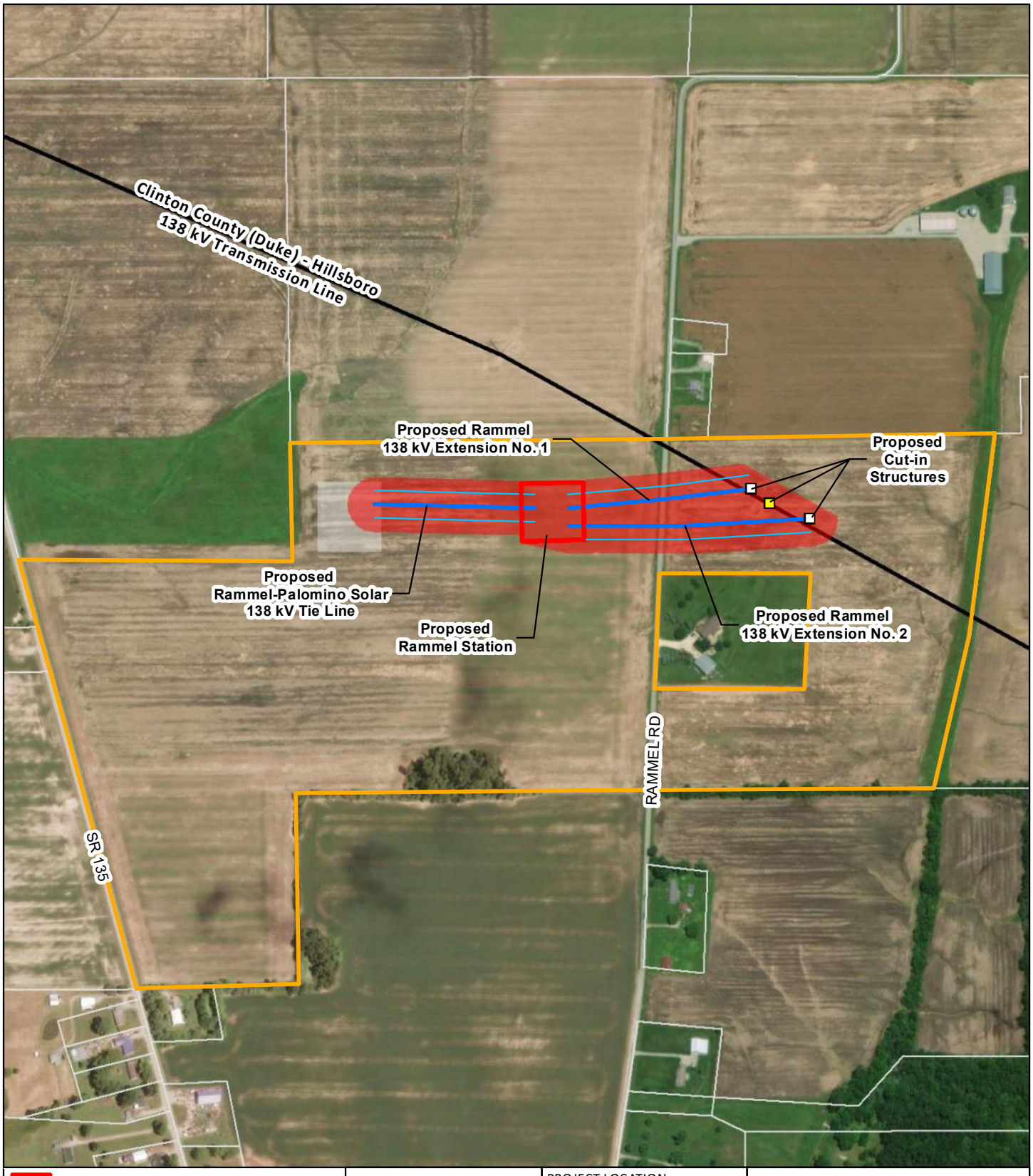
FIGURE 1
TOPOGRAPHIC OVERVIEW

AEP OHIO TRANSMISSION COMPANY

Rammel 138 kV Station and Rammel 138 kV Extension No. 1 and No. 2 Project

0 1,000 2,000 3,000

Feet



- Proposed Rammel Station Fence
- Proposed Transmission Line
- Proposed Additional Cut-in
- Proposed Replacement Cut-in Structure
- Proposed Right-of-way
- Project Corridor
- IPP Property
- Existing Transmission Line
- Approximate IPP Distribution Station
- Parcel Boundary

Data Sources: AEP,
ESRI World Imagery (2023)

Ohio State Plane South
NAD 1983

May 01, 2026

PROJECT LOCATION

HIGHLAND COUNTY, OHIO

FIGURE 2
PROJECT AERIAL MAP

AEP OHIO TRANSMISSION COMPANY

Rammel 138 kV Station and
Rammel 138 kV Extension
No. 1 and No. 2 Project

0 250 500 750

Feet

Appendix B Agency Correspondence

In reply refer to:
2026-HIG-67867

April 7, 2026

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

RE: **Section 106 Review: Rammel Station Project, Highland County, Ohio**

Dear Mr. Porter:

This letter is in response to the correspondence received on March 16, 2026, regarding the proposed Rammel Station Project in Highland 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 *Phase I Cultural Resource Management Investigations for the 14.6-Hectare (36-Acre) Rammel Station Project in Dodson Township, Highland County, Ohio* (Weller & Associates, Inc., 2026). The current investigations are related to a station area and portions of transmission line corridor. Subsurface testing, visual inspection, surface collection, and a literature review were completed as part of the investigations. Much of the project area had been previously surveyed (NADB 20783; 22277). One (1) historic property was previously recorded within the indirect APE, but this property was demolished sometime between 2023 and 2024. There were no previously documented archaeological sites located within the direct APE and no new archaeological sites were identified. Our office agrees that no additional archaeological survey is necessary.

Based on the information provided, our office agrees that the project, as proposed, will have no effect on historic properties. Therefore, no further coordination is required, unless the project changes or additional cultural 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 have any questions concerning this review, please contact me via email at broddy@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Bridget C. Roddy

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

RPR Serial No. 1113268

United States Department of the Interior

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

February 11, 2026

Project Code: 2026-0046482

Dear Mr. Geckle:

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

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

bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The 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.

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

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

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

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

Sincerely,

Erin Knoll
Field Office Supervisor

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

Department of Natural Resources
ohiodnr.gov

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

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

March 4, 2026

Aaron Geckle
V3 Companies
312 Walnut Street, Suite 1600
Cincinnati, Ohio 45202

Re: 26-0237_AEP Rammel Station IPP

Project: The proposed project involves the construction of the Rammel Station between State Route 135 and Rammel Road, a connection to the existing Hillsboro–Clinton 138-kV transmission line, and the construction of a new 138-kV gen tie transmission line to a solar facility substation to interconnect the solar generation facility.

Location: The proposed project is located in Dodson Township, Highland County, Ohio.

Center Coordinates: (39.2160, -83.7752)

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

Natural Heritage Database: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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

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

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

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

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

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

The project is within the range of the bigeye shiner (*Notropis boops*), a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact this or other aquatic species.

The project is within the range of the timber rattlesnake (*Crotalus horridus horridus*), a state endangered species, and a federal species of concern. The timber rattlesnake is a woodland species, utilizing dry slopes and rocky outcrops. In addition to using wooded areas, the timber rattlesnake utilizes sunlit gaps in the canopy for basking and deep rock crevices for overwintering. 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.

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

Water Resources: The Division of Water Resources has not conducted a project specific review and/or comments, however, the guidance provided below should be reviewed by the Environmental Review applicant for applicability on this project and subsequent compliance.

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

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

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

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

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

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

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

Appendix C Ecological Survey Report

Rammel Station IPP Project

Ecological Report

Project Site:

West and east of Rammel Rd
Lynchburg, Highland County, Ohio

Prepared For:

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

Aldridge Electric, Inc.
844 E. Rockland Road
Libertyville, IL 60048

Prepared By:

V3 Companies
1060 N Capitol Avenue, Suite 6-301
Indianapolis, IN 46204
(317) 423-0690
v3co.com

March 2026

Table of Contents

FIGURES

TABLES

APPENDICES

EXECUTIVE SUMMARY

V3 Companies, Ltd. (V3), performed an ecological survey and report for Rammel Station Independent Power Producer (IPP) Project, located in Lynchburg, Highland County, (SITE) on March 11, 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.

- One stream was identified on-SITE. ST-1- INT is 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).
- No wetlands were identified on-SITE.
- 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 threatened northern long-eared bat (*Myotis septentrionalis)*, and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside of the approved seasonal clearing window (October 1 through March 31). 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 Ohio Department of Natural Resources (ODNR) indicated that there are no records of endangered, threatened, or rare (ETR) species or special features/areas within a one-mile radius of the SITE. Additionally, the ODNR Division of Fish and Wildlife stated that the SITE is within the range of six ETR species. The ODNR stated that due to the potential for impacts to federally listed and state listed species, that the project should be coordinated with the US Fish and Wildlife service.

Chapter 1 Introduction

This report has been prepared solely in accordance with an agreement between Aldridge Electric ("CLIENT") Inc., 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 project consists of construction of the Rammel Station, a substation, between State Route 135 and Rammel Road, connecting to existing Hillsboro-Clinton 138-kV transmission line; and construction of a new 138-kV gen tie transmission line to a solar facility substation to interconnect the facility in Lynchburg, Highland 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 Lynchburg, Ohio USGS 7.5-Minute Quadrangle Map. No Section, Township and Range designations are applicable at this location, as the site lies within the Virginia Military Survey District. V3 evaluated the topography and concluded that the SITE elevation ranges from approximately 1,030 to 1,035 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
R5UBH	Riverine (R), Unknow Perennial or Intermittent (5), Unconsolidated Bottom (UB), Permanently Flooded (H)	2

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 Highland County, Ohio. No portion of the SITE is mapped within the 100-year floodway or a flood zone (**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 Highland 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 Highland County
WsS1B1	Westboro-Schaffer silt loams, 2 to 4 percent slopes	No
Cle1A	Clermont silt loam, 0 to 1 percent slopes	Yes
RpC2	Rossmoyne silt loam, 6 to 12 percent slopes, eroded	No
WsS1A1	Westboro-Schaffer silt loams, 0 to 2 percent slopes	No

One hydric soil unit is situated within the SITE. Clermont silt loam is considered hydric within Highland County, Ohio. Soils are considered hydric if more than 50 percent of the soil contains hydric components according to the NRCS Web Soil Survey. The presence of hydric soil units within the SITE area suggests appropriate wetland soils are located on-SITE.

3.5 Endangered, Threatened, and Rare Specie Evaluation

An official species list obtained from the USFWS IPaC website indicated that the SITE is within the ranges of the federally endangered Indiana bat (Myotis sodalis), the federally threatened northern long-eared bat (Myotis septentrionalis), 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 and the northern long-eared bats. See **Table 3** for the recommended clearing dates. The USFWS stated the due to the project, type, size, and location, the agency does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.

Correspondence with the ODNR indicated no records of ETR species or designated special features within a one-mile radius of the SITE area. However, the ODNR Division of Fish and Wildlife identified that the SITE falls within the range of six (6) ETR species. The ODNR concluded that the project is not likely to adversely impact these species, provided that suitable habitat is avoided, and provided recommendations to avoid and minimize potential impacts (**Table 3**).

Due to the presence of state-listed bat species within the region, ODNR advised that tree clearing during the summer months is not recommended. Furthermore, seasonal presence/absence surveys conducted during the summer would not be considered sufficient to document absence; therefore, tree clearing should occur during the winter clearing window to minimize potential impacts.

Based on the documentation referenced above, additional correspondence with the USFWS may be warranted. 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
Fishes								
Notropis boops	Bigeye shiner	Endangered	N/A	Perennial streams	No	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 – Suitable habitat no present within the project area and no in-water work is proposed.
Reptiles								
Crotalus horridus	Timber rattlesnake	Endangered	Species of Concern	Woodland species, utilizing dry slopes and rocky outcrops. In addition to using wooded areas, the timber rattlesnake utilizes sunlit gaps in the canopy for basking and deep rock crevices for overwintering	No	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-Suitable habitat no present within the project area

Mammals								
Myotis lucifugus	Little brown bat	Endangered	N/A	During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees	No	1 April to 30 September	ODNR/USFWS - Cutting of trees is recommended between 1 October and 31 March. Summer surveys are not sufficient to confirm absence of listed bat species for this project. ODNR - If a habitat assessment finds that potential hibernacula are present within 5 miles 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. Because presence/absence surveys are not acceptable for this project, tree clearing must occur within the winter clearing window.
Myotis septentrionalis	Northern long-eared bat	Endangered	Threatened		No			
Myotis sodalis	Indiana bat	Endangered	Endangered		No			
Perimyotis subflavus	Tricolored bat	Endangered	N/A		No			

Chapter 4 Site Reconnaissance

4.1 Methodology

V3 conducted a field investigation at the SITE on March 11, 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 36-acre SITE consists of agricultural land with active crop production and drainage features. Adjacent land use consists of similar agricultural fields with scattered rural residencies, roadways, and utility infrastructure.

4.3 Wetland Summary

No wetlands were identified during this investigation based upon the methodology set forth in the *1987 Manual* and the *Midwest Regional Supplement*. Information that V3 collected at each DP on March 11, 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**.

4.4 Data Point Summary

Below is a description of the information collected at each additional DP during the March 11, 2026 field investigation. The site visit was conducted following a recent rain event, which may have influenced hydrologic indicators and site observations. The purpose of collecting these DPs was to describe 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 1

This DP was collected in the southeastern portion of the SITE. This area met hydrology criteria but did not meet vegetation and soil 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 Kentucky bluegrass (*Poa pratensis*, FAC, 50% cover) and large crabgrass (*Digitaria sanguinalis*, FACU, 20% cover). Indicators of wetland hydrology observed included saturation (A3).

DP 2

This DP was collected in the northwestern portion of the SITE. This area met hydrology criteria but did not meet vegetation and soil 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 soybean crop residue (*Glycine max Residue*, UPL, 50% cover). No indicators of hydric soils were observed. Indicators of wetland hydrology observed included saturation (A3).

DP 3

This DP was collected in the southwestern portion of the SITE. This area met hydrology criteria but did not meet vegetation and soil 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 red sorrel (*Rumex acetosella*, FACU, 55% cover) and canary grass (*Phalaris canariensis*, FACU, 40% cover). No indicators of hydric soils were observed. Indicators of wetland hydrology observed included saturation (A3).

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

One stream, one upland drainage feature, two ditches, and two erosional features were identified during this investigation using the methods described in Chapter 2. Information that V3 collected at each feature on March 11, 2026, is described in the following section. An overall SITE delineation map is included as **Figure 4**.

4.5.1 ST-1-INT – (162-linear feet, Intermittent)

ST-1-INT is located in the southeastern portion of the SITE and consisted of 162 linear feet of intermittent stream within the SITE. ST-INT-1 exhibited an OHWM and will likely qualify as federally jurisdictional "Waters of the U.S." subject to USACE and OEPA authority.

Flow was observed at the time of the site visit, exhibiting high turbidity, which appeared to be due to recent precipitation. The substrate of ST-1-INT could not be directly observed due to safety concerns and turbid conditions at the time of the site visit. Based on site context and surrounding soils, the channel is inferred to consist primarily of fine-grained sediments, silt, sand and clay.

4.5.2 Upland Drainage Feature 1 (153 linear feet, former Anthony Run)

Upland Drainage Feature (UDF 1) is located in the southeastern portion of the SITE and consists of approximately 153 linear feet of a shallow, diffuse drainage feature within an actively farmed field. This feature is mapped as Riverine (R5UBH) on the National Wetlands Inventory (NWI); however, field observations conducted on March 11, 2026, indicate that it does not function as a stream. No defined bed or bank was observed, and the feature lacks a distinct, channelized morphology. Instead, the drainage area is characterized by a broad, low-gradient swale that conveys surface water as sheet flow during and shortly after precipitation events. At the time of the site visit, shallow, turbid flow was present due to recent rainfall, but water was dispersed across a wide area rather than confined to a defined channel. The substrate could not be directly observed due to inundation at the time of the site visit; however, based on site conditions and surrounding soils, it is inferred to consist primarily of fine-grained sediments (silt and clay) typical of agricultural settings. No indicators of OHWM were identified within the feature.

Given observed field conditions, UDF 1 appears to be a non-regulated swale "characterized by low volume, infrequent, or short duration flow" per 40 CFR § 120.2(b)(8). Upland Drainage Feature 1 is not anticipated to qualify as a federally jurisdictional "Water of the U.S." subject to USACE and/or OEPA authority.

4.5.3 Road Ditch-1 (542 linear feet)

Road Ditch 1 (Ditch -1) is located along western margin of Rammel Road and consists of approximately 542 LF of a linear, anthropogenic drainage feature within the SITE, conveying runoff from the adjacent road surface and surrounding agricultural fields. The Ditch-1 is shallow with a weakly defined bed and bank maintained through routine grading. During the March 11, 2026 site visit, shallow, turbid flow was observed following recent precipitation; however, flow appears intermittent and stormwater-driven. The substrate is inferred to consist of fine-grained sediments (silt and clay), and no indicators of OHWM were identified.

Based on observed conditions, Ditch-1 is a roadside ditch excavated wholly in and drying only dry land that do not carry a relatively permanent flow of water" ; therefore, it is consistent with exclusion under 40 CFR § 120.2(b)(3) and is not anticipated to qualify as a federally jurisdictional "Water of the U.S." subject to USACE and/or OEPA authority.

4.5.4 Road Ditch-2 (729 linear feet)

Road Ditch 2 (Ditch-2) is located along eastern margin of Rammel Road and consists of approximately 729 LF of a linear, anthropogenic drainage feature within the SITE, conveying runoff from the adjacent road surface and surrounding agricultural fields. The Ditch-2 is shallow with a weakly defined bed and bank maintained through routine grading. During the March 11, 2026 site visit, shallow, turbid flow was observed following recent precipitation; however, flow appears intermittent and stormwater-driven. The substrate is inferred to consist of fine-grained sediments (silt and clay), and no indicators of OHWM were identified.

Based on observed conditions, Ditch-2 is a roadside ditch excavated wholly in and drying only dry land that do not carry a relatively permanent flow of water" ; therefore, it is consistent with exclusion under 40 CFR § 120.2(b)(3) and is not anticipated to qualify as a federally jurisdictional "Water of the U.S." subject to USACE and/or OEPA authority.

4.5.5 Erosional Feature -1 (503 linear feet)

Erosional Feature (EF-1) is located in the southeastern portion of the SITE and consists of approximately 503 LF of a shallow, diffuse drainage feature within an actively farmed field. The feature lacks a defined bed and bank and exhibits no distinct channel, with flow occurring as broad, shallow sheet flow during and shortly after precipitation events.

Based on observed conditions, EF-1 is best characterized as an erosional feature consistent with exclusions under 40 CFR § 120.2(b)(8) and is not anticipated to qualify as a federally jurisdictional "Water of the U.S." subject to USACE and/or OEPA authority.

4.5.6 Erosional Feature-2 (106 linear feet)

Erosional Feature (EF-2) is located in the northwestern portion of the SITE and consists of approximately 106 LF of a shallow, diffuse drainage feature within an actively farmed field. The feature lacks a defined bed and bank and does not exhibit a distinct channel, with flow occurring as broad, shallow sheet flow during and shortly after precipitation events.

Based on observed conditions, EF-2 is best characterized as an erosional feature consistent with exclusions under 40 CFR § 120.2(b)(8) and is not anticipated to qualify as a federally jurisdictional "Water of the U.S." subject to USACE and/or OEPA authority.

Table 4: Delineated Stream Identified within the Survey Area

Feature	Location		Stream Type	Delineated Length (LF)	Bankfull Width (feet)	OHWM Width (feet)	Field Evaluation			OEPA 401 Eligibility
	Latitude	Longitude					Method	Score	Category / Rating / OAC Designation	
ST-1-INT	39.21450°	-83.79270°	Intermittent	±162 LF	5	2*	HHEI	55	Class II Primary Headwater	Eligible

**Estimated at approximately 2 feet due to flooding conditions.*

Chapter 5 Conclusions

On March 11, 2026, V3 performed a wetland delineation of the SITE located in the Lynchburg, Ohio USGS 7.5-Minute Quadrangle Map.

Table 5: Aquatic Features Identified On-SITE

Feature	Feature Type	Size On-SITE	Anticipated Regulatory Status
ST-1-INT	Intermittent Stream	162 LF	USACE/OEPA
UDF-1	Upland Drainage Feature/Swale	153 LF	Not regulated
Ditch-1	Road Ditch	542 LF	Not regulated
Ditch-2	Road Ditch	729 LF	Not regulated
EF-1	Erosional Feature	503 LF	Not regulated
EF-2	Erosional Feature	106 LF	Not regulated

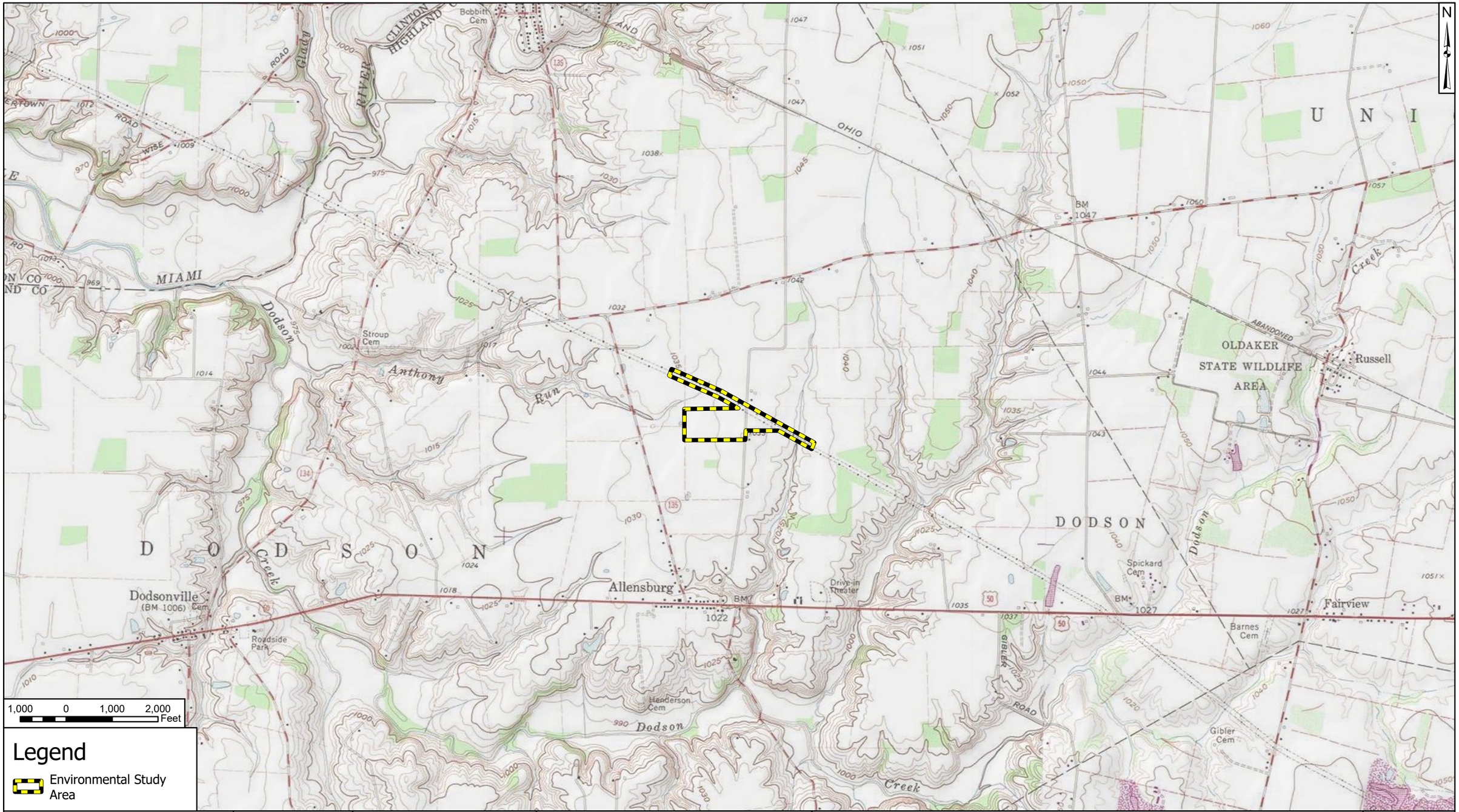
One stream was identified on-SITE. ST-1- INT is likely to be considered "Waters of the U.S." and subject to regulation by the Ohio Environmental Protection Agency (OEPA) and U.S. Army Corps of Engineers (USACE).

No wetlands were identified on-SITE.

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 threatened northern long-eared bat (*Myotis septentrionalis)*, and the monarch butterfly (*Danaus plexippus*), a candidate for listing under the Endangered Species Act. The USFWS made recommendations to avoid impacts to on-SITE streams and wetlands, and to avoid clearing potential roost trees for the federally listed bat species outside of the approved seasonal clearing window (October 1 through March 31). 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 that there are no records of ETR species or special features/areas within a one-mile radius of the SITE. Additionally, the ODNR Division of Fish and Wildlife stated that the SITE is within the range of six ETR species. The ODNR stated that due to the potential for impacts to federally listed and state listed species, that the project should be coordinated with the US Fish and Wildlife service.

Figures



Legend

Environmental Study Area

1060 N Capitol Avenue
Suite 6-301
Indianapolis, IN 46204
317.423.0690 phone
www.v3co.com

Go beyond limits

PROJECT NO.:	221294.003
CREATED BY:	AIM
DATE:	03/25/2026
SCALE:	See Scale Bar

CLIENT: American Electric Power
8600 Smiths Mill Road
New Albany, Ohio 43054

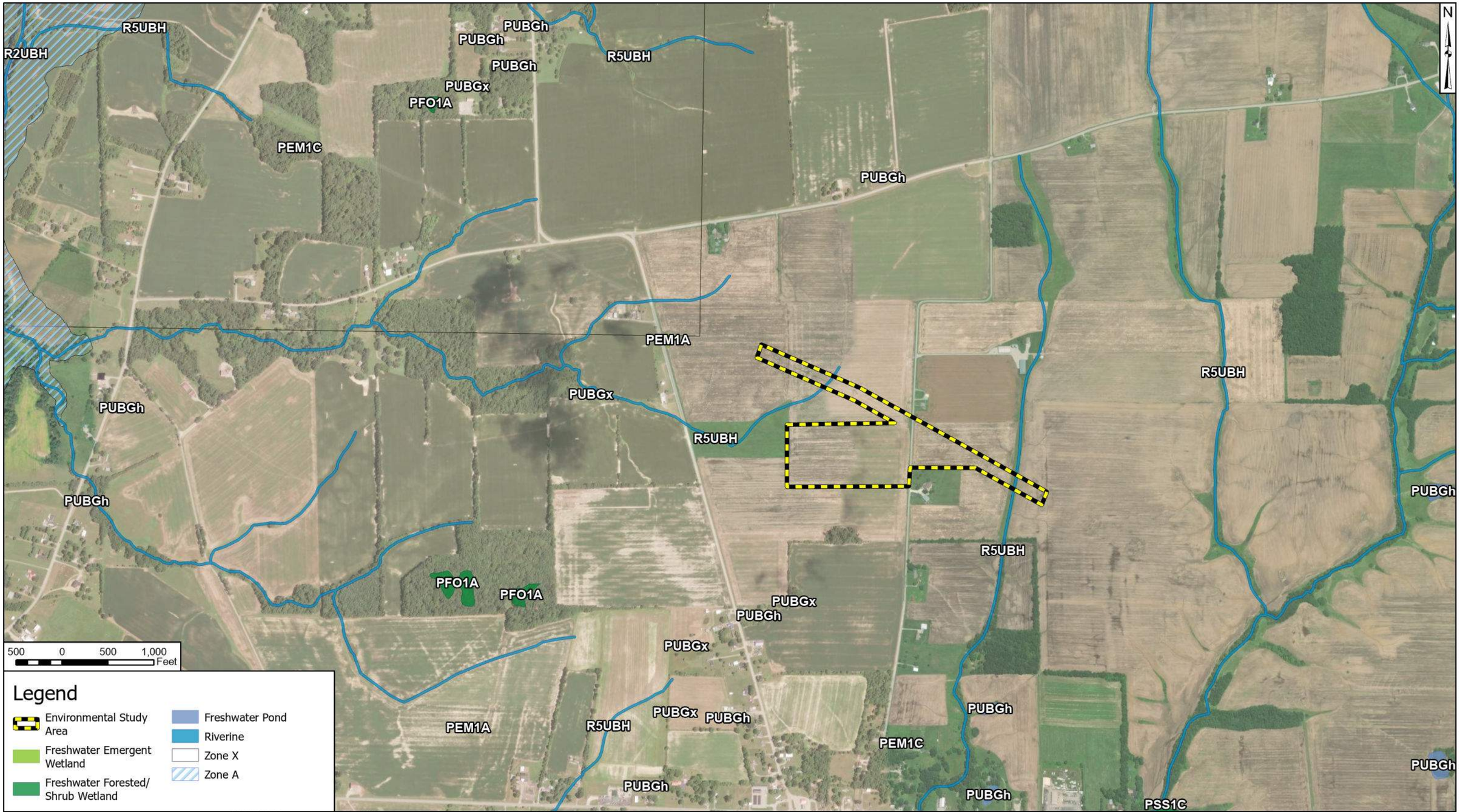
BASE LAYER: USGS Topographic Map
Lynchburg, Ohio Quadrangle

SITE: Rammel Station IPP Project
Highland County, Ohio

TITLE: **PROJECT LOCATION MAP**

EXHIBIT: 1

J:\2022\221294\221294.003_Rammel\Projects\NRA_221294_003\NRA_221294_003.aprx



1060 N Capitol Avenue
Suite 6-301
Indianapolis, IN 46204
317.423.0690 phone
www.v3co.com

Go beyond limits

PROJECT NO.: 221294.003
CREATED BY: AIM
DATE: 03/25/2026
SCALE: See Scale Bar

CLIENT: American Electric Power
8600 Smiths Mill Road
New Albany, Ohio 43054

BASE LAYER: ESRI Aerial Imagery (2019)

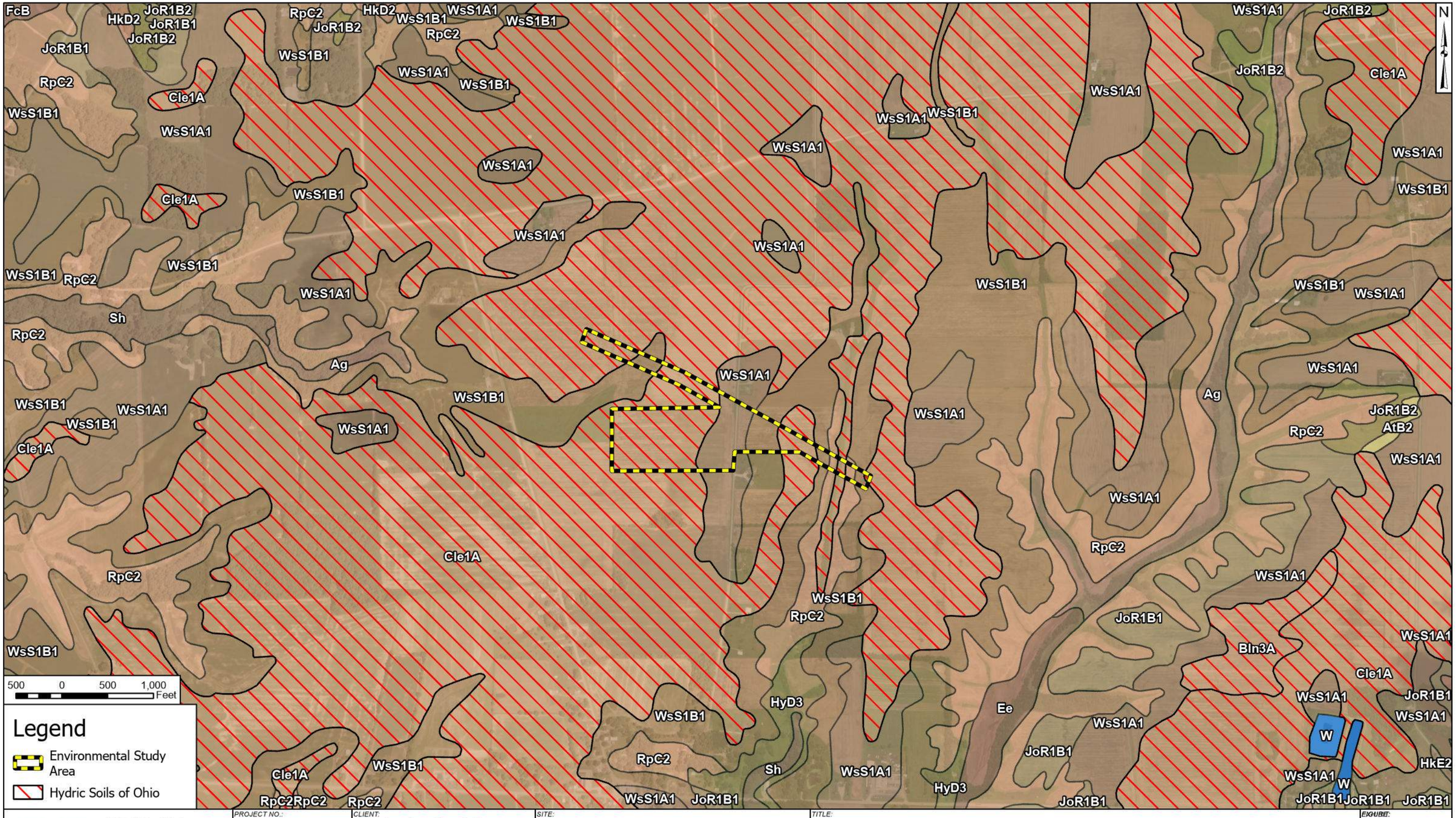
SITE: Rammel Station IPP Project
Highland County, Ohio

TITLE:

NATIONAL WETLANDS INVENTORY & NATIONAL FLOOD ZONE MAP

EXHIBIT: 2

J:\2022\221294\221294.003_Rammel\Projects\NRA_221294_003\NRA_221294_003.aprx

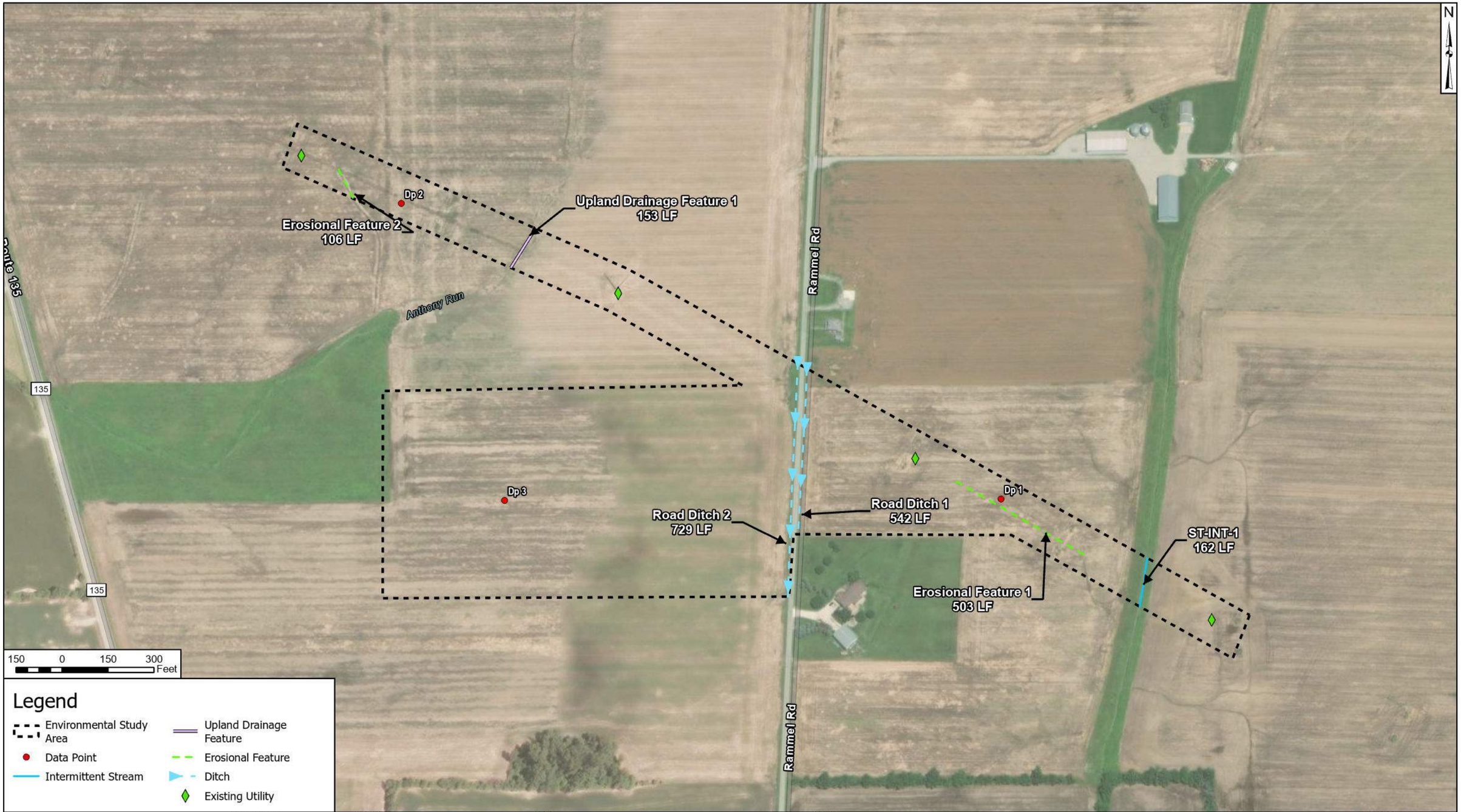


1060 N Capitol Avenue
Suite 6-301
Indianapolis, IN 46204
317.423.0690 phone
www.v3co.com

Go beyond limits

PROJECT NO.:	221294.003
CREATED BY:	AIM
DATE:	03/25/2026
SCALE:	See Scale Bar
CLIENT:	American Electric Power 8600 Smiths Mill Road New Albany, Ohio 43054
BASE LAYER:	ESRI Aerial Imagery (2019)
SITE:	Rammel Station IPP Project Highland County, Ohio
TITLE:	**SOIL SURVEY OF OHIO MAP**
EXHIBIT:	3

J:\2022\221294\221294.003_Rammel\Projects\NRA_221294_003\NRA_221294_003.aprx



1060 N Capitol Avenue
Suite 6-301
Indianapolis, IN 46204
317.423.0690 phone
www.v3co.com

Go beyond limits

PROJECT NO.: 221294.003
CREATED BY: AIM
DATE: 03/25/2026
SCALE: See Scale Bar

CLIENT: American Electric Power
8600 Smiths Mill Road
New Albany, Ohio 43054

BASE LAYER: ESRI Aerial Imagery (2019)

SITE: Rammel Station IPP Project
Highland County, Ohio

TITLE: **DELINEATION MAP**

EXHIBIT: 4

J:\2022\221294\221294.003_Rammel\Projects\NRA_221294_003\NRA_221294_003.aprx

Appendix A

ETR Species Correspondence Letters

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: 02/06/2026 16:24:21 UTC
Project Code: 2026-0046482
Project Name: V3, AEP Rammel IPP, Highland County, OH

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: 2026-0046482
Project Name: V3, AEP Rammel IPP, Highland County, OH
Project Type: Transmission Line - Maintenance/Modification - Above Ground
Project Description: AEP proposes a new Rammel Substation, a 138 kV transmission line extension from the Hillsboro-Clinton 138 kV line, and a 138 kV transmission line gen tie to a solar facility substation in order to interconnect the solar generation facility. AEP proposes an approximately 43-acre study area representing the project footprint to evaluate potential impacts to federally-listed species. Construction is anticipated during the second half of 2026.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.2163487,-83.77532084494682,14z

Counties: Highland County, Ohio

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 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 Fisheries[1], 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 *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* 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: Ohio Power Siting Board
Name: Aaron Geckle
Address: 312 Walnut Street
Address Line 2: Suite 1600
City: Cincinnati
State: OH
Zip: 45202
Email ageckle@v3co.com
Phone: 5138003622

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Ohio Power Siting Board

Department of Natural Resources
ohiodnr.gov

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

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

March 4, 2026

Aaron Geckle
V3 Companies
312 Walnut Street, Suite 1600
Cincinnati, Ohio 45202

Re: 26-0237_AEP Rammel Station IPP

Project: The proposed project involves the construction of the Rammel Station between State Route 135 and Rammel Road, a connection to the existing Hillsboro–Clinton 138-kV transmission line, and the construction of a new 138-kV gen tie transmission line to a solar facility substation to interconnect the solar generation facility.

Location: The proposed project is located in Dodson Township, Highland County, Ohio.

Center Coordinates: (39.2160, -83.7752)

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

Natural Heritage Database: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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

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

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

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

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

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

The project is within the range of the bigeye shiner (*Notropis boops*), a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact this or other aquatic species.

The project is within the range of the timber rattlesnake (*Crotalus horridus horridus*), a state endangered species, and a federal species of concern. The timber rattlesnake is a woodland species, utilizing dry slopes and rocky outcrops. In addition to using wooded areas, the timber rattlesnake utilizes sunlit gaps in the canopy for basking and deep rock crevices for overwintering. 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.

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

Water Resources: The Division of Water Resources has not conducted a project specific review and/or comments, however, the guidance provided below should be reviewed by the Environmental Review applicant for applicability on this project and subsequent compliance.

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

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

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

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

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

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

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

United States Department of the Interior

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

February 11, 2026

Project Code: 2026-0046482

Dear Mr. Geckle:

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

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

bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The 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.

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

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

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

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

Sincerely,

Erin Knoll
Field Office Supervisor

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

Appendix B

SITE Photographs

Project Name: Rammel Station IPP

Site Photographs

Photo 1

Stream 1

Photo 2

Stream 1 - Looking Upstream

Photo 3

Data Point 1

Upland

Photo 4

Data Point 1

Upland

Photo 5

Data Point 2

Upland

Photo 6

Data Point 2

Upland

Photo 7

Data Point 3

Upland

Photo 8

Data Point 3

Upland

Photo 9

Erosional Feature 1

Upland

Photo 10

Erosional Feature 1

Upland

Photo 11

Upland Drainage Feature

Upland

Photo 12

Upland Drainage Feature

Upland

Photo 13

SITE

Upland

Photo 14

SITE

Upland

Photo 15

SITE

Upland

Photo 16

SITE

Upland

Appendix C

Data Forms

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Midwest Region
See ERDC/EL TR-10-16; the proponent agency is CECW-COR

OMB Control #: 0710-0024, Exp: 09/30/2027
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Rammel Station | City/County: Highland County | Sampling Date: 2026-03-11
Applicant/Owner: AEP | State: Ohio | Sampling Point: DP 1
Investigator(s): A. Santiago, A. Marchlewska | Section, Township, Range: N/A
Landform (hillside, terrace, etc.): Flat | Local relief (concave, convex, none): None
Slope (%): 0-2 | Lat: 39.215267 | Long: -83.770727 | Datum: WGS84
Soil Map Unit Name: Clermont silt loam, 0 to 1 percent slopes | NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✓ (If no, explain in Remarks.)
Are Vegetation ✓, Soil ✓, or Hydrology ✓ significantly disturbed? Are "Normal Circumstances" present? Yes ____ No ✓
Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No ✓	**Is the Sampled Area within a Wetland?** Yes ____ No ✓
Hydric Soil Present?	Yes ____	No ✓	
Wetland Hydrology Present?	Yes ✓	No ____	

Remarks:
Although surface water and soil saturation were observed at the time of the site visit, these conditions occurred immediately following a rainfall event and may not represent typical site hydrology. The soil profile exhibited low chroma matrix colors; however, redoximorphic features were not observed within the upper 12 inches, and no primary hydric soil indicator was identified. Vegetation was dominated by facultative and upland species associated with disturbed agricultural conditions. Therefore, the area does not meet wetland criteria under normal circumstances.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	0	=Total Cover	
Sapling/Shrub Stratum (Plot size: 15' radius)			
1.			
2.			
3.			
4.			
5.			
	0	=Total Cover	
Herb Stratum (Plot size: 5' radius)			
1. Poa pratensis	50	Y	FAC
2. Digitaria sanguinalis	20	Y	FACU
3. Cynodon dactylon	15	N	FACU
4. Veronica anagallis-aquatica	10	N	OBL
5. Glycine max Residue	5	N	UPL
6.			
7.			
8.			
9.			
10.			
	100.0	=Total Cover	
Woody Vine Stratum (Plot size: 30' radius)			
1.			
2.			
	0	=Total Cover	

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
Total Number of Dominant Species Across All Strata: 2 (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: 50.00 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	10	x 1 =	10
FACW species	0	x 2 =	0
FAC species	50	x 3 =	150
FACU species	35	x 4 =	140
UPL species	5	x 5 =	25
Column Totals:	100 (A)		325.00 (B)

Prevalence Index = B/A = 3.25

Hydrophytic Vegetation Indicators:
____ 1 - Rapid Test for Hydrophytic Vegetation
____ 2 - Dominance Test is >50%
____ 3 - Prevalence Index is ≤3.0[1]
____ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
____ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No ✓

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: DP 1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-12	10YR 4/2	100					SICL	
12-16	10YR 4/2	90	10YR 6/6	10	C	M	SICL	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ 2 cm Muck (A10)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Iron Monosulfide (A18)
- ___ Sandy Mucky Mineral (S1)
- ___ 5 cm Mucky Peat or Peat (S3)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ Iron-Manganese Masses (F12)
- ___ Red Parent Material (F21) Very
- ___ Shallow Dark Surface (F22)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ___ **No** ✓

Remarks:

Soil was saturated at the time of observation, which may have limited the visibility of redoximorphic features in the upper horizon.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✓ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ True Aquatic Plants (B14)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Gauge or Well Data (D9)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes ___ No ✓ Depth (inches): _____

Water Table Present? Yes ___ No ✓ Depth (inches): _____

Saturation Present? Yes ✓ No ___ Depth (inches): 0

(includes capillary fringe)

Wetland Hydrology Present? **Yes** ✓ **No** ___

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

The site visit was conducted immediately following a rainfall event, which may have influenced the presence and extent of observed hydrology indicators.

AGENCY DISCLOSURE NOTIFICATION

The public reporting burden for this collection of information, OMB Control Number 0710-0024, is estimated to average 30 minutes per response, including the timefor reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services,at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. **PLEASE DO NOT RETURN YOUR REQUEST TO THE ABOVE EMAIL.**

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers; Final Rule 33 CFR 320-332. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public and may be made available as part of a public notice as required by Federal law. Submission of requested information is voluntary, however, if information is not provided the permit application cannot be evaluated nor can a permit be issued. One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and/or instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned. System of Record Notice (SORN). The information received is entered into our permit tracking database and a SORN has been completed (SORN #A1145b) and may be accessed at the following website: http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570115/a1145b-ce.aspx

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Midwest Region
See ERDC/EL TR-10-16; the proponent agency is CECW-COR

OMB Control #: 0710-0024, Exp: 09/30/2027
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Rammel Station | City/County: Highland County | Sampling Date: 2026-03-11
Applicant/Owner: AEP | State: Ohio | Sampling Point: DP 2
Investigator(s): A. Santiago, A. Marchlewska | Section, Township, Range:
Landform (hillside, terrace, etc.): Flat | Local relief (concave, convex, none): None
Slope (%): 0-2 | Lat: 39.217835 | Long: -83.777677 | Datum: WGS84
Soil Map Unit Name: Clermont silt loam, 0 to 1 percent slopes | NWI classification:
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✓ (If no, explain in Remarks.)
Are Vegetation ✓, Soil ✓, or Hydrology ✓ significantly disturbed? Are "Normal Circumstances" present? Yes ____ No ✓
Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No ✓	**Is the Sampled Area within a Wetland?** **Yes** ____ **No** ✓
Hydric Soil Present?	Yes ____	No ✓	
Wetland Hydrology Present?	Yes ✓	No ____	

Remarks:
Although surface water and soil saturation were observed at the time of the site visit, these conditions occurred immediately following a rainfall event and may not represent typical site hydrology. The soil profile exhibited low chroma matrix colors; however, redoximorphic features were not observed within the upper 12 inches, and no primary hydric soil indicator was identified. Vegetation was dominated by facultative and upland species associated with disturbed agricultural conditions. Therefore, the area does not meet wetland criteria under normal circumstances.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	0	=Total Cover	
Sapling/Shrub Stratum (Plot size: 15' radius)			
1.			
2.			
3.			
4.			
5.			
	0	=Total Cover	
Herb Stratum (Plot size: 5' radius)			
1. Glycine max Residue	50	Y	UPL
2. Poa pratensis	3	N	FAC
3. Digitaria sanguinalis	2	N	FACU
4.			
5.			
6.			
7.			
8.			
9.			
10.			
	55.0	=Total Cover	
Woody Vine Stratum (Plot size: 30' radius)			
1.			
2.			
	0	=Total Cover	

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)
Total Number of Dominant Species Across All Strata: 1 (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: 0.00 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	3	x 3 =	9
FACU species	2	x 4 =	8
UPL species	50	x 5 =	250
Column Totals:	55 (A)		267.00 (B)

Prevalence Index = B/A = 4.85

Hydrophytic Vegetation Indicators:
____ 1 - Rapid Test for Hydrophytic Vegetation
____ 2 - Dominance Test is >50%
____ 3 - Prevalence Index is ≤3.0[1]
____ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
____ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes** ____ **No** ✓

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: DP 2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-12	10YR 4/2	100					SICL	
12-18	10YR 4/2	90	10YR 6/6	10	C	M	SICL	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ 2 cm Muck (A10)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Iron Monosulfide (A18)
- ___ Sandy Mucky Mineral (S1)
- ___ 5 cm Mucky Peat or Peat (S3)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ Iron-Manganese Masses (F12)
- ___ Red Parent Material (F21) Very
- ___ Shallow Dark Surface (F22)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ___ **No** ✓

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✓ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ True Aquatic Plants (B14)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Gauge or Well Data (D9)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes ___ No ✓ Depth (inches): ___

Water Table Present? Yes ___ No ✓ Depth (inches): ___

Saturation Present? Yes ✓ No ___ Depth (inches): 0

(includes capillary fringe)

Wetland Hydrology Present? **Yes** ✓ **No** ___

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

The site visit was conducted immediately following a rainfall event, which may have influenced observed hydrologic conditions.

AGENCY DISCLOSURE NOTIFICATION

The public reporting burden for this collection of information, OMB Control Number 0710-0024, is estimated to average 30 minutes per response, including the timefor reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services,at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. **PLEASE DO NOT RETURN YOUR REQUEST TO THE ABOVE EMAIL.**

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers; Final Rule 33 CFR 320-332. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public and may be made available as part of a public notice as required by Federal law. Submission of requested information is voluntary, however, if information is not provided the permit application cannot be evaluated nor can a permit be issued. One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and/or instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned. System of Record Notice (SORN). The information received is entered into our permit tracking database and a SORN has been completed (SORN #A1145b) and may be accessed at the following website: http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570115/a1145b-ce.aspx

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Midwest Region
See ERDC/EL TR-10-16; the proponent agency is CECW-COR

OMB Control #: 0710-0024, Exp: 09/30/2027
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Rammel Station | City/County: Highland County | Sampling Date: 2026-03-11
Applicant/Owner: AEP | State: Ohio | Sampling Point: DP 3
Investigator(s): A. Santiago, A. Marchlewska | Section, Township, Range:
Landform (hillside, terrace, etc.): Flat | Local relief (concave, convex, none): None
Slope (%): 0-2 | Lat: 39.21519 | Long: -83.776438 | Datum: WGS84
Soil Map Unit Name: Clermont silt loam, 0 to 1 percent slopes | NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✓ (If no, explain in Remarks.)
Are Vegetation ✓, Soil ✓, or Hydrology ✓ significantly disturbed? Are "Normal Circumstances" present? Yes ✓ No ____
Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No ✓	**Is the Sampled Area within a Wetland?** Yes ____ No ✓
Hydric Soil Present?	Yes ____	No ✓	
Wetland Hydrology Present?	Yes ✓	No ____	

Remarks:
Although surface water and soil saturation were observed at the time of the site visit, these conditions occurred immediately following a rainfall event and may not represent typical site hydrology. The soil profile exhibited low chroma matrix colors; however, redoximorphic features were not observed within the upper 12 inches, and no primary hydric soil indicator was identified. Vegetation was dominated by facultative and upland species associated with disturbed agricultural conditions. Therefore, the area does not meet wetland criteria under normal circumstances.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	0	=Total Cover	
Sapling/Shrub Stratum (Plot size: 15' radius)			
1.			
2.			
3.			
4.			
5.			
	0	=Total Cover	
Herb Stratum (Plot size: 5' radius)			
1. Rumex acetosella	55	Y	FACU
2. Phalaris canariensis	40	Y	FACU
3. Glycine max Residue	5	N	UPL
4.			
5.			
6.			
7.			
8.			
9.			
10.			
	100.0	=Total Cover	
Woody Vine Stratum (Plot size: 30' radius)			
1.			
2.			
	0	=Total Cover	

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)
Total Number of Dominant Species Across All Strata: 2 (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: 0.00 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	95	x 4 =	380
UPL species	5	x 5 =	25
Column Totals:	100 (A)		405.00 (B)

Prevalence Index = B/A = 4.05

Hydrophytic Vegetation Indicators:
____ 1 - Rapid Test for Hydrophytic Vegetation
____ 2 - Dominance Test is >50%
____ 3 - Prevalence Index is ≤3.0[1]
____ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
____ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No ✓

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: DP 3

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-12	10YR 4/2	100					SICL	
12-18	10YR 4/2	90	10YR 6/6	10	C	M	SCL	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ 2 cm Muck (A10)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Iron Monosulfide (A18)
- ___ Sandy Mucky Mineral (S1)
- ___ 5 cm Mucky Peat or Peat (S3)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ Iron-Manganese Masses (F12)
- ___ Red Parent Material (F21) Very
- ___ Shallow Dark Surface (F22)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ___ **No** ✓

Remarks:

Low chroma matrix colors (10YR 4/2) were observed from the surface to 18 inches; however, redoximorphic features were only observed beginning at approximately 12 inches below ground surface. Soil saturation at the time of sampling may have limited visibility of redox features in the upper horizon.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✓ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ True Aquatic Plants (B14)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Gauge or Well Data (D9)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes ___	No ✓	Depth (inches): ___
Water Table Present?	Yes ___	No ✓	Depth (inches): ___
Saturation Present? (includes capillary fringe)	Yes ✓	No ___	Depth (inches): 0

Wetland Hydrology Present? **Yes** ✓ **No** ___

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

The site visit was conducted during and immediately following a rainfall event, which may have influenced the presence and extent of observed hydrology indicators.

AGENCY DISCLOSURE NOTIFICATION

The public reporting burden for this collection of information, OMB Control Number 0710-0024, is estimated to average 30 minutes per response, including the timefor reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services,at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. **PLEASE DO NOT RETURN YOUR REQUEST TO THE ABOVE EMAIL.**

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers; Final Rule 33 CFR 320-332. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public and may be made available as part of a public notice as required by Federal law. Submission of requested information is voluntary, however, if information is not provided the permit application cannot be evaluated nor can a permit be issued. One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and/or instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned. System of Record Notice (SORN). The information received is entered into our permit tracking database and a SORN has been completed (SORN #A1145b) and may be accessed at the following website: http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570115/a1145b-ce.aspx

Appendix D

HHEI Form

OhioEPA Primary Headwater Habitat Evaluation Form

HHEI Score (sum of metrics 1, 2, 3) : 55

SITE NAME/LOCATION: Rammel Station, Highland County, Ohio

SITE NUMBER: St-1 RIVER BASIN: DRAINAGE AREA (mi²): 0.35

LENGTH OF STREAM REACH (ft): 200 LAT.: 39.21450 LONG.: -83.79270 RIVER CODE: RIVER MILE:

DATE: 03/11/20 SCORER: A. Marchlew COMMENTS:

NOTE: Complete All Items On This Form - Refer to "Field Evaluation Manual for Ohio's PHWH Streams" for Instructions

STREAM CHANNEL MODIFICATIONS: ☐ NONE / NATURAL CHANNEL ☐ RECOVERED ☑ RECOVERING ☐ RECENT OR NO RECOVERY

1. SUBSTRATE (Estimate percent of every type of substrate present. Check *ONLY* two predominant substrate *TYPE* boxes (Max of 32). Add total number of significant substrate types found (Max of 8). Final metric score is sum of boxes A & B.

TYPE		PERCENT	TYPE		PERCENT
☐☐	BLDR SLABS [16 pts]	0%	☑☐	SILT [3 pt]	90%
☐☐	BOULDER (>256 mm) [16 pts]	0%	☐☐	LEAF PACK/WOODY DEBRIS [3 pts]	0%
☐☐	BEDROCK [16 pt]	0%	☐☐	FINE DETRITUS [3 pts]	0%
☐☐	COBBLE (65-256 mm) [12 pts]	0%	☐☐	CLAY or HARDPAN [0 pt]	0%
☐☐	GRAVEL (2-64 mm) [9 pts]	0%	☐☐	MUCK [0 pts]	0%
☐☑	SAND (<2 mm) [6 pts]	10%	☐☐	ARTIFICIAL [3 pts]	0%

Total of Percentages of Bldr Slabs, Boulder, Cobble, Bedrock: 0.00% (A) (B)

SCORE OF TWO MOST PREDOMINATE SUBSTRATE TYPES: 9 **TOTAL NUMBER OF SUBSTRATE TYPES:** 1

2. Maximum Pool Depth ***(Measure the maximum pool depth within the 61 meter (200 ft)*** evaluation reach at the time of evaluation. Avoid plunge pools from road culverts or storm water pipes) (Check *ONLY* one box):

- ☐ > 30 centimeters [20 pts]
- ☐ > 22.5 - 30 cm [30 pts]
- ☑ > 10 - 22.5 cm [25 pts]
- ☐ > 5 cm - 10 cm [15 pts]
- ☐ < 5 cm [5 pts]
- ☐ NO WATER OR MOIST CHANNEL [0 pts]

COMMENTS: High flow observed due to rain events. **MAXIMUM POOL DEPTH (centimeters):** 20

3. BANK FULL WIDTH (Measured as the average of 3-4 measurements) **(Check *ONLY* one box):**

- ☐ > 4.0 meters (> 13') [30 pts]
- ☐ > 3.0 m - 4.0 m (> 9' 7" - 13') [25 pts]
- ☑ > 1.5 m - 3.0 m (> 9' 7" - 4' 8") [20 pts]
- ☐ > 1.0 m - 1.5 m (> 3' 3" - 4' 8") [15 pts]
- ☐ ≤ 1.0 m (<=3' 3") [5 pts]

COMMENTS: **AVERAGE BANKFULL WIDTH (meters):** 3.00

HHEI Metric Points

Substrate Max = 40	10
A + B	
Pool Depth Max = 30	25
Bankfull Width Max=30	20

This information must also be completed

RIPARIAN ZONE AND FLOODPLAIN QUALITY ☆NOTE: River Left (L) and Right (R) as looking downstream☆

RIPARIAN WIDTH L	R	(Per Bank)	FLOODPLAIN QUALITY L	R	(Most Predominant per Bank)	L	R	
☐	☐	Wide >10m	☐	☐	Mature Forest, Wetland	☐	☐	Conservation Tillage
☐	☐	Moderate 5-10m	☐	☐	Immature Forest, Shrub or Old Field	☐	☐	Urban or Industrial
☐	☐	Narrow <5m	☐	☐	Residential, Park, New Field	☑	☑	Open Pasture, Row Crop
☑	☑	None	☐	☐	Fenced Pasture	☐	☐	Mining or Construction

COMMENTS:

FLOW REGIME *(At Time of Evaluation)* (Check *ONLY* one box):

- ☑ Stream Flowing
- ☐ Subsurface flow with isolated pools (Interstitial)
- ☐ Moist Channel, isolated pools, no flow (Intermittent)
- ☐ Dry channel, no water (Ephemeral)

COMMENTS:

SINUOSITY (Number of bends per 61 m (200 ft) of channel) (Check *ONLY* one box):

☑ None	☐ 1.0	☐ 2.0	☐ 3.0
☐ 0.5	☐ 1.5	☐ 2.5	☐ >3

STREAM GRADIENT ESTIMATE

☐ Flat (0.5 ft/100 ft) ☑ Flat to Moderate ☐ Moderate (2 ft/100 ft) ☐ Moderate to Severe ☐ Severe (10 ft/100 ft)

ADDITIONAL STREAM INFORMATION (This Information Must Also be Completed):

QHEI PERFORMED? - ☐ Yes ☑ No QHEI Score _____ (If Yes, Attach Completed QHEI Form)

DOWNSTREAM DESIGNATED USE(S)

☐ WWH Name: _____ Distance from Evaluated Stream _____

☐ CWH Name: _____ Distance from Evaluated Stream _____

☐ EWH Name: _____ Distance from Evaluated Stream _____

MAPPING: ATTACH COPIES OF MAPS, INCLUDING THE ENTIRE WATERSHED AREA. CLEARLY MARK THE SITE LOCATION

USGS Quadrangle Name: Lynchburg NRCS Soil Map Page: _____ NRCS Soil Map Stream Order _____

County: Highland Township / City: Dodson/Lynchburg

MISCELLANEOUS

Base Flow Conditions? (Y/N): N Date of last precipitation: 03/11/20 Quantity: 0.00

Photograph Information: _____

Elevated Turbidity? (Y/N): Y Canopy (% open): 0%

Were samples collected for water chemistry? (Y/N): N (Note lab sample no. or id. and attach results) Lab Number: _____

Field Measures: Temp (°C)_____ Dissolved Oxygen (mg/l) _____ pH (S.U.) _____ Conductivity (µmhos/cm) _____

Is the sampling reach representative of the stream (Y/N) Y If not, please explain: _____

Additional comments/description of pollution impacts: _____

BIOTIC EVALUATION

Performed? (Y/N): N (If Yes, Record all observations. Voucher collections optional. NOTE: all voucher samples must be labeled with the site ID number. Include appropriate field data sheets from the Primary Headwater Habitat Assessment Manual)

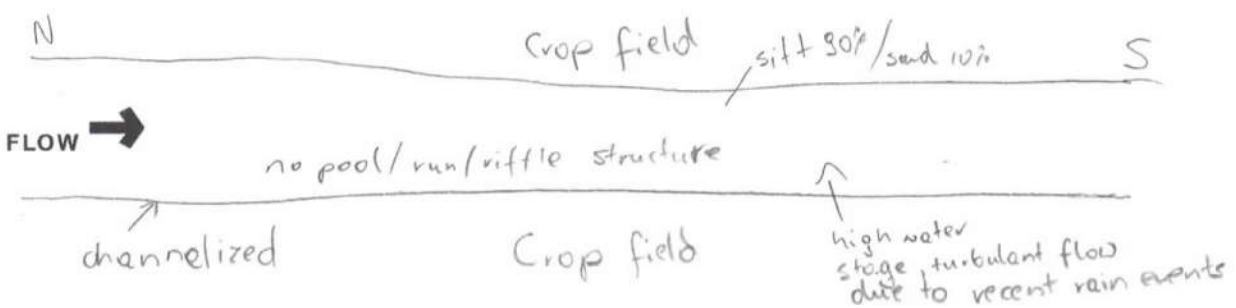
Fish Observed? (Y/N) N Voucher? (Y/N) N Salamanders Observed? (Y/N) N Voucher? (Y/N) N

Frogs or Tadpoles Observed? (Y/N) N Voucher? (Y/N) N Aquatic Macroinvertebrates Observed? (Y/N) N Voucher? (Y/N) N

Comments Regarding Biology: _____

DRAWING AND NARRATIVE DESCRIPTION OF STREAM REACH (This must be completed):

Include important landmarks and other features of interest for site evaluation and a narrative description of the stream's location



Save as pdf Reset Form