Letter of Notification for the Curleys 345 kV Station Project

AEP OHIO TRANSMISSION COMPANY℠

An AEP Company

BOUNDLESS ENERGY℠

PUCO Case No. 26-0351-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.

April 13, 2026

LETTER OF NOTIFICATION

AEP Ohio Transmission Company, Inc.

Curleys 345 kV Station 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

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 Construction Notification.

The Company is proposing the Curleys 345 kV Station Project (the "Project"), located in the city of New Albany and Jersey Township, Licking County, Ohio. The Project involves construction of a new 15.4-acre transmission substation to provide electricity to a customer's facility. The Project is located entirely within property owned by the customer and will support the customer's new and ongoing development in the area. The proposed Curleys Station will be supplied by cutting into and modifying the existing Conesville–Corridor 345 kV Transmission Line and will interconnect with the customer-owned Numenor Station via four new 345 kV tie lines, designated as Curleys–Numenor 345 kV Tie Lines #1 through #4 (see Case No. 26-0352-EL-BNR). The location of the Project is shown on Map 1 and Map 2 of **Appendix A**.

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

(3) Constructing a new electric power transmission substation.

The Project has been assigned Case No. 26-0351-EL-BLN.

B(2) Statement of Need

If the proposed Letter of Notification project is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.

The customer has requested electric service to support an estimated initial peak demand of 226 MW, with an ultimate projected demand of approximately 968 MW. To reliably serve this load and ensure continuity of service throughout the customer's development and construction phases, a combination of temporary and permanent electric infrastructure improvements is required. The temporary facilities necessary to support early customer construction and initial operations were previously filed and approved under Case No. 26-0171-EL-BLN. The permanent facilities, which are the subject of this application (the Project), are required to support the customer's long-term load requirements and future expansion plans. The Project consists of installing a new 345 kV substation, Curleys 345 kV Station, and associated transmission facilities. Curleys Station will be supplied by cutting into and modifying the existing Conesville–Corridor 345 kV Transmission Line. This work includes the construction of less than 0.2 miles of new 345 kV transmission line from the line cut-in point to the Curleys Station site. The modified and rerouted transmission line will be constructed as a double-circuit 345 kV line, establishing two 345 kV connections between the Bermuda Station (Approved Case No. 25-0046-EL-BLN) and the proposed Curleys Station. Curleys Station will interconnect with the customer-owned Numenor Station via four new 345 kV tie lines, designated as Curleys–Numenor 345 kV Tie Lines #1 through #4. Advanced Transmission technologies were considered but were ultimately deemed not applicable for this specific Project.

Failure to move forward with the overall project will result in the inability to serve the customer's new load requirements and the customer's future plans in the area.

The need for the Curleys Project and the proposed solution were presented to PJM in November 2022 and May 2023, respectively. PJM subsequently assigned the Project a supplemental project identification number, s3442.8. In addition, the Curleys Project was identified in the Company's 2025 Long Term Forecast Report on pages 78 and 79 (see **Appendix B**).

B(3) Project Location

The applicant shall 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 **Map 1**, in **Appendix A**. **Map 2**, in **Appendix A**, identifies the Project components on a 2024 aerial photograph.

B(4) Alternatives Considered

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

The Project is located entirely within property owned by the customer. Based on the customer's proposed development and existing facilities in the area, the proposed location is the most suitable location for the Project. Other alternatives would require more significant impacts to neighboring properties, as opposed to remaining primarily on the customer's property. In addition, the proposed location of the station minimizes the length of the required cut-in and tie lines associated with the existing Conesville – Corridor 345 kV Transmission Line (see Case No. 26-0352-EL-BNR).

The Project is predominantly located on undeveloped land and will not require impacts to any delineated wetland or streams. The location of the Project minimizes impacts on the community and the environment, while considering the engineering and construction needs of the customer. The Project also represents the most suitable location and most appropriate solution for meeting the Company's and customer's needs.

B(5) Public Information Program

The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

The Company will inform affected property owners and tenants about this Project through several different mediums. Within seven days of filing this LON, the Company will issue a public notice in a newspaper of general circulation in the Project area. The notice will comply with all requirements of OAC Section 4906-6-08(A)(1)-(6). Further, the Company will mail a letter, via first class mail, to affected landowners, tenants, contiguous owners, and any other landowner the Company may approach for an easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with all requirements of OAC Section 4906-6-08(B). The Company maintains a website (http://aeptransmission.com/ohio/) which hosts an electronic copy of this LON and the public notice of this LON. An electronic copy of the LON will be served to the public library in each political subdivision affected by this Project. In addition, the Company retains ROW land agents that discuss Project timelines, construction and restoration activities and convey this information to affected owners and tenants.

B(6) Construction Schedule

The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.

Construction of the Project is planned to begin in May 2026 with an anticipated in-service date of January 2027. For this reason, the Company is requesting an expedited 36-day review of this application.

B(7) Area Map

The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Map 1, in **Appendix A**, identifies the location of the Project area on a United States Geological Survey 1:24,000 New Albany quadrangle map. **Appendix A**, **Map 2** identifies the location of the Project area on a 2024 aerial photograph.

B(8) Property Agreements

The applicant shall 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.

The proposed Curleys Station is located on Company owned property.

B(9) Technical Features

The applicant shall 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:

1 – 16'x72' Drop In Control Module
15 – 345kV Circuit Breakers
2 – Cap Banks

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.

B(9)(b)(i) Calculated Electric and Magnetic Field Strength Levels

i) Calculated Electric and Magnetic Field Levels

Not applicable. No occupied residences or institutions are located within 100 feet of the Project.

B(9)(b)(ii) Design Alternatives

A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

Not applicable. No occupied residences or institutions are located within 100 feet of the Project.

B(9)(b)(ii)(c) Project Cost

The estimated capital cost of the project.

The costs estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately $49 million using a Class 4 estimate. Pursuant to the PJM OATT, the costs for this Project will be recovered in the AEP Ohio Transmission Company Inc.'s FERC formula rate (Attachment H-20 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Economic Impacts

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

B(10)(a) Operating Characteristics

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 is located in the City of New Albany and Jersey Township in Licking County, Ohio. Land use in the Project area is predominantly vacant agricultural land or agricultural land, as classified by the Licking County Auditor. The Project is located within areas of Licking County that are currently undergoing industrial development. No schools, parks, places of worship, cemeteries, wildlife management areas, or nature preserve lands were identified in proximity to the Project.

B(10)(b) Agricultural Land Information

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

No agricultural easements designated by the Ohio Department of Agriculture (ODA) are located in the Project Area. Based on email coordination with the Licking County Auditor's Office on February 17, 2026, there are no agricultural district parcels within the potential disturbance area of the Project. The entire 15.4-acre Project was historically used as agricultural land until 2025 when grading occurred for industrial development.

B(10)(c) Archaeological and Cultural Resources

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

A cultural resource survey and report were conducted by the Company's consultant for the Project in 2025. Correspondence from the State Historic Preservation Office ("SHPO") was received on December 29, 2025,

see **Appendix C**. The SHPO stated that that the Project will have no adverse effect on historic properties and that no further archaeological work is necessary.

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

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

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

Table 2 – Anticipated Permits

Permit/Authorization/Coordination	Agency	Date
Storm Water Pollution Prevention Plan	Ohio Environmental Protection Agency	Approved 2/27/2026
	City of New Albany	Coordination in progress
Notice Criteria	Federal Aviation Administration	No further action required 3/6/2026
Clean Water Act Section 404/401	United States Army Corps of Engineers	Not anticipated based on wetland impacts
	Ohio Environmental Protection Agency	
Archaeology/Architectural	Ohio Historic Preservation Office	Coordination complete 12/29/25, no additional work required
Threatened and Endangered Species	United States Fish and Wildlife Service	Coordination complete 12/12/2024
Threatened and Endangered Species	Ohio Department of Natural Resources	Coordination complete 12/20/2024

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.

Coordination letters were submitted to the United State Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) Ohio Natural Heritage Program (ONHP) and Division of Wildlife (DOW), seeking an environmental review of the Project for potential impacts to state and/or

federally protected species. ODNR and USFWS provided responses on December 20, 2024, and December 12, 2024, respectively. Copies of the agencies' responses are presented in **Appendix C**.

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

In November 2024, the Company's consultant conducted wetland and stream delineation surveys for an approximately 21.8-acre survey area encompassing the Project (see **Appendix D**). The survey team did not identify any streams, ponds, or wetlands within the 15.4-acre station.

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.

No tree clearing is proposed for the Project. If tree clearing were to become part of the Project scope of work, the ODNR and the USFWS recommend implementations of seasonal tree clearing between October 1 and March 31 to avoid adverse effects to Indiana bat, northern long-eared bat, little brown bat, and tricolored bat.

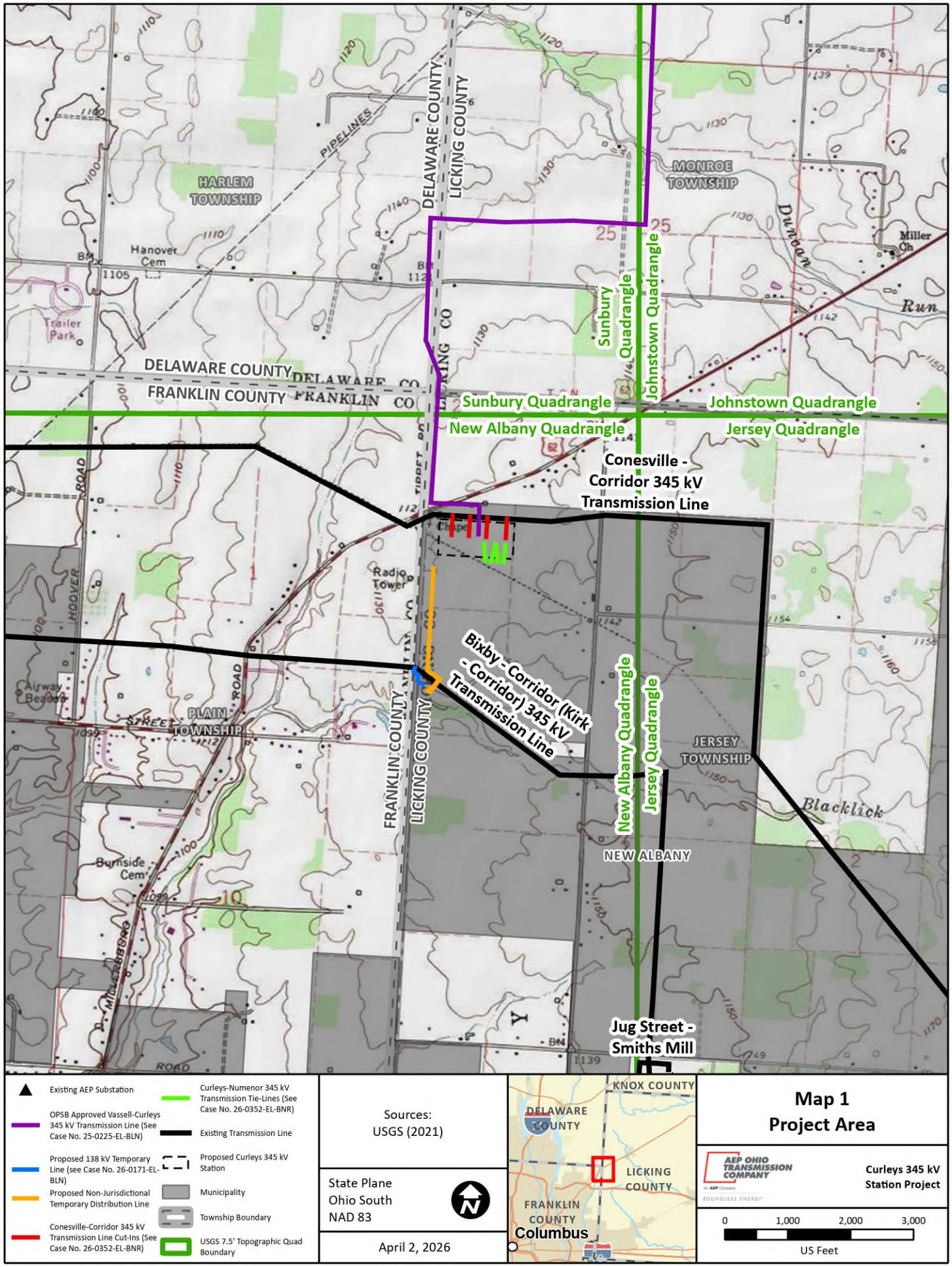
The FEMA Flood Insurance Rate Map (map number 39089C0257J) was reviewed to check for the presence of floodplains/flood hazard areas within the Project area. No mapped FEMA floodplains are located in the Project area.

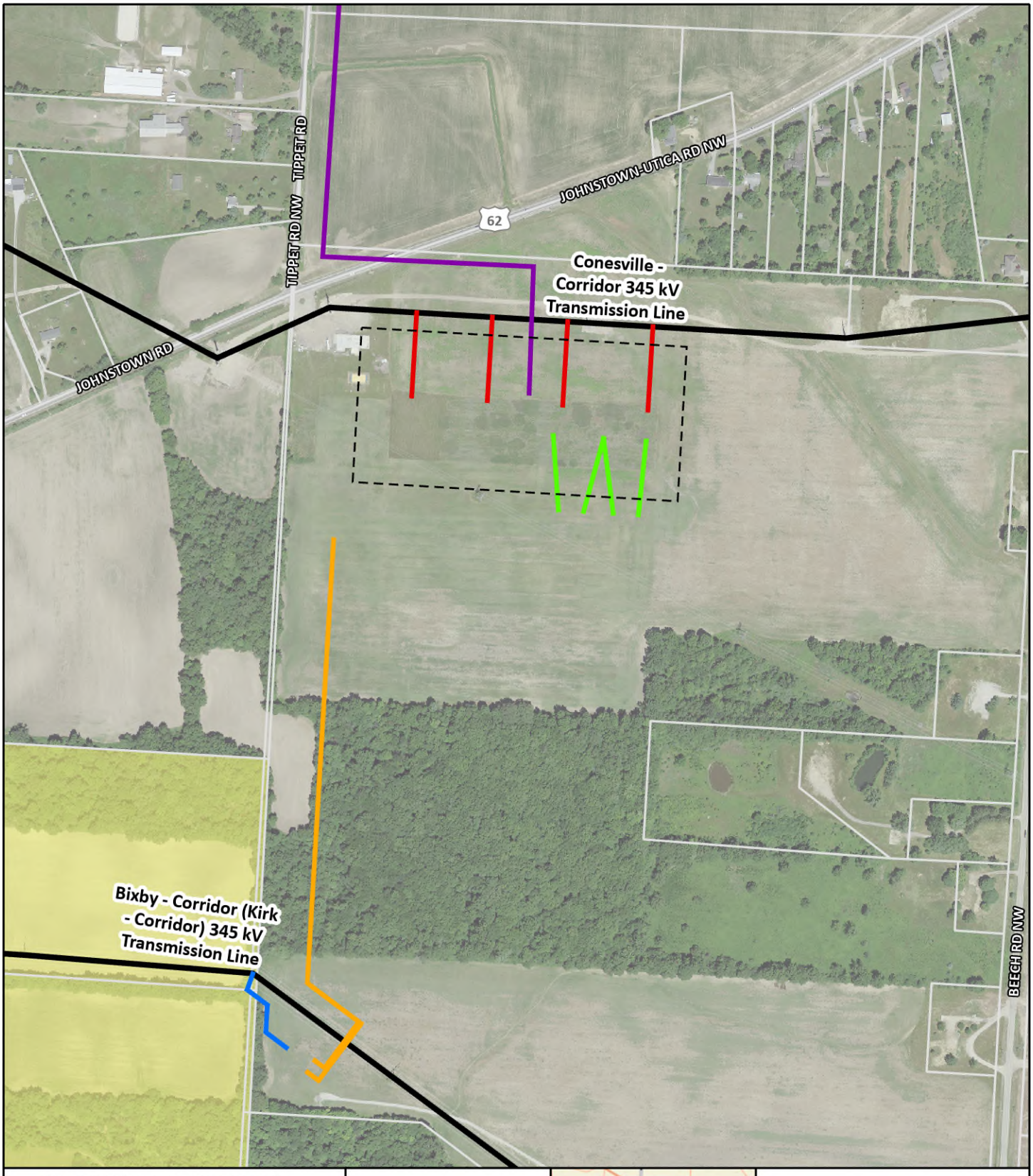
B(10)(g) Unusual Conditions

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


HARLEM TOWNSHIP
MONROE TOWNSHIP
DELAWARE COUNTY
LICKING COUNTY
FRANKLIN COUNTY
PLAIN TOWNSHIP
JERSEY TOWNSHIP
NEW ALBANY
Sunbury Quadrangle
Johnstown Quadrangle
New Albany Quadrangle
Jersey Quadrangle
Conesville - Corridor 345 kV Transmission Line
Bixby - Corridor (Kirk - Corridor) 345 kV Transmission Line
Jug Street - Smiths Mill
Hanover Cem
Trailer Park
Radio Tower
Airway Beacon
Burnside Cem
Blacklick
Miller Ch
Duncan Run
PIPELINES
HOOVER ROAD
STREET ROAD
MIDDLEBURG ROAD
Existing AEP Substation
OPSB Approved Vassell-Curleys 345 kV Transmission Line (See Case No. 25-0225-EL-BLN)
Proposed 138 kV Temporary Line (see Case No. 26-0171-EL-BLN)
Proposed Non-Jurisdictional Temporary Distribution Line
Conesville-Corridor 345 kV Transmission Line Cut-Ins (See Case No. 26-0352-EL-BNR)
Curleys-Numenor 345 kV Transmission Tie-Lines (See Case No. 26-0352-EL-BNR)
Existing Transmission Line
Proposed Curleys 345 kV Station
Municipality
Township Boundary
USGS 7.5' Topographic Quad Boundary
Sources: USGS (2021)
State Plane Ohio South NAD 83
April 2, 2026
KNOX COUNTY
DELAWARE COUNTY
LICKING COUNTY
FRANKLIN COUNTY
Columbus
Map 1
Project Area
AEP OHIO TRANSMISSION COMPANY
Curleys 345 kV Station Project
0
1,000
2,000
3,000
US Feet



- Proposed 138 kV Temporary Line (see Case No. 26-0171-EL-BLN)
- Proposed Non-Jurisdictional Temporary Distribution Line
- OPSB Approved Vassell-Curleys 345 kV Transmission Line (See Case No. 25-0225-EL-BLN)
- Conesville-Corridor 345 kV Transmission Line Cut-Ins (See Case No. 26-0352-EL-BNR)
- Curleys-Numenor 345 kV Transmission Tie-Lines (See Case No. 26-0352-EL-BNR)
- Existing Transmission Line
- Proposed Curleys 345 kV Station
- Agricultural District Crossed by Project
- Parcel Boundary

Sources:
OSIP (2024)

State Plane
Ohio South
NAD 83

April 2, 2026

Map 2
Aerial Map

AEP OHIO TRANSMISSION COMPANY
An AEP Company
BOUNDLESS ENERGY

Curleys 345 kV Station Project

0 400 800
US Feet

Appendix B PJM Slides & LTFR

AEP Transmission Zone M-3 Process
New Albany, OH

Need Number: AEP-2022-OH077

Process Stage: Need Meeting 11/18/2022

Project Driver:

Customer Service

Specific Assumption Reference:

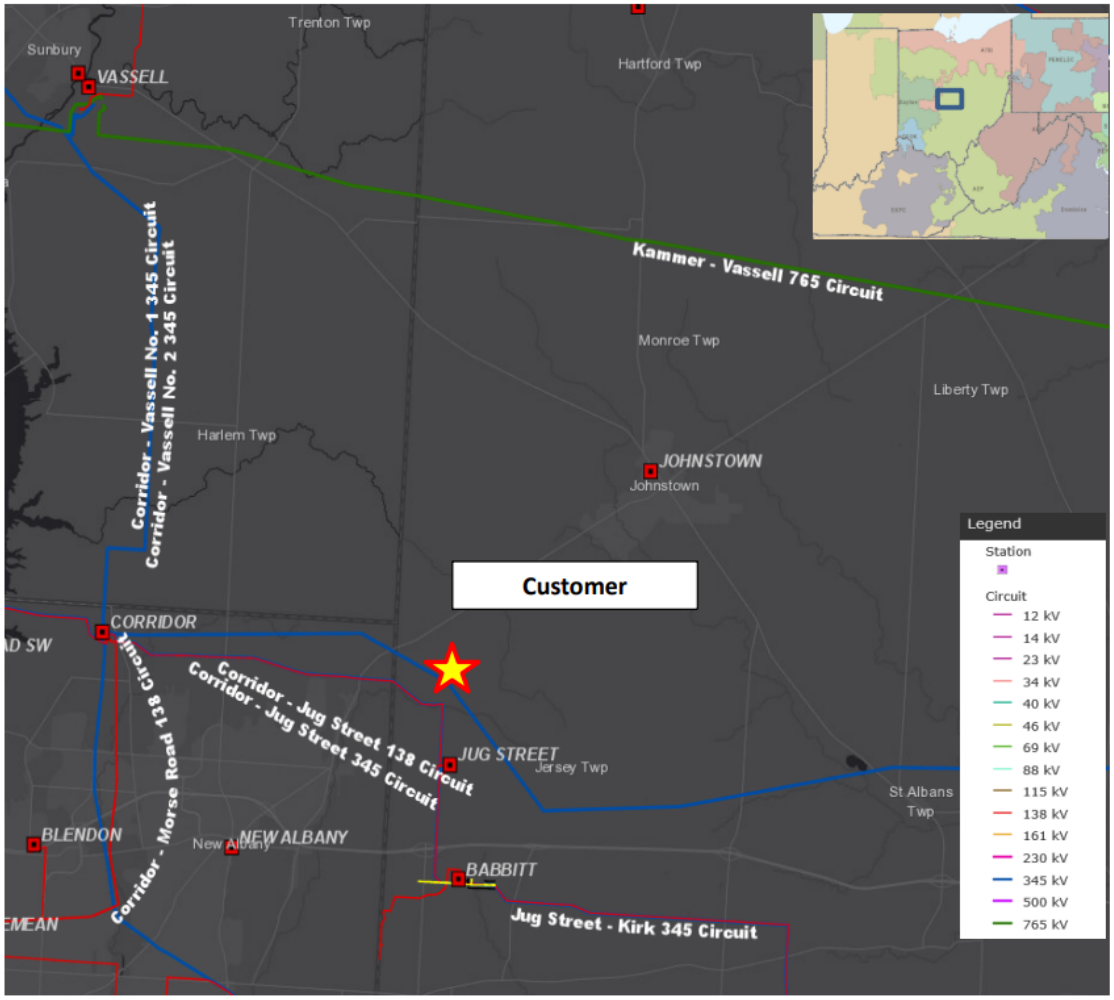
AEP Connection Requirements for the AEP Transmission System (AEP Assumptions Slide 12)

Problem Statement:

Customer Service:

- A customer has requested transmission service at a site north of AEP's existing Jug Street station in New Albany, OH.
- The customer has indicated an initial peak demand of 226 MW with an ultimate capacity of up to 1065 MW at the site.
- The customer has requested an ISD of 5/1/2026

Model: 2027 RTEP



AEP Transmission Zone M-3 Process
New Albany , OH

Need Number: AEP-2022-OH077

Process Stage: Solutions Meeting 5/9/2023

Proposed Solution (continued):

The following work is all direct connect facilities to physically connect demand to the grid.

- **Curleys 345 kV**: Cut into the rerouted Corridor – Innovation 345 kV circuit, utilizing 2-bundled ACSR Falcon 1590 (54/19) conductor, SE rating 2278 MVA, to a new 345 kV Curleys station with (14) 5000 A, 63kA circuit breakers & (1) 158.4 MVAR 345 kV Cap bank, laid out as breaker and a half for future expansion to 3 strings with future configurations to build up to total (10) breaker and half strings. Construct four single circuit lines ~0.1 miles, between Curleys station and the customer; utilizing 2-bundle ACSR Drake 795 (26/7) conductor SE 1800 MVA. The rerouted line, built as double circuit, will establish two 345 kV ties between Bermuda and Curleys stations. Cost: **$55.2 M**

12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Potential for increased transmission line outages
13	**MISCELLANEOUS:**	
1	**LINE NAME AND NUMBER:**	Vassell - Green Chapel 345 kV (TP2022981)(s3442.18,s3442.27,s3442.28,s3442.29 & s3442.30)
2	**POINTS OF ORIGIN AND TERMINATION**	Vassell - Green Chapel INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	~12.5 mi / 150 ft / 2 circuit
4	**VOLTAGE: DESIGN / OPERATE**	345 kV / 345 kV
5	**APPLICATION FOR CERTIFICATE:**	2024
6	**CONSTRUCTION:**	2025 - 2027
7	**CAPITAL INVESTMENT:**	$75 M
8	**PLANNED SUBSTATION:**	N/A
9	**SUPPORTING STRUCTURES:**	Steel
10	**PARTICIPATION WITH OTHER UTILITIES**	N/A
11	**PURPOSE OF THE PLANNED TRANSMISSION LINE**	Mitigate overloading on multiple transmission facilities including other 345 kV transmission lines and 345-138 kV transformers
12	**CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION**	Potential for increased transmission line outages
13	**MISCELLANEOUS:**	
1	**LINE NAME AND NUMBER:**	Vassell - Curleys 345 kV (TP2022981)(s3442.18,s3442.27,s3442.28,s3442.29 & s3442.30)
2	**POINTS OF ORIGIN AND TERMINATION**	Vassell - Curleys INTERMEDIATE STATION - N/A
3	**RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS**	~12.5 mi / 150 ft / 2 circuit
4	**VOLTAGE: DESIGN / OPERATE**	345 kV / 345 kV
5	**APPLICATION FOR CERTIFICATE:**	2024
6	**CONSTRUCTION:**	2025 - 2027
7	**CAPITAL INVESTMENT:**	$75 M
8	**PLANNED SUBSTATION:**	N/A
9	**SUPPORTING STRUCTURES:**	Steel

Appendix C Agency Coordination Letters

In reply, refer to
2025-LIC-67035

December 29, 2025

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

RE: Curleys Station and Corridor-Conesville 345 Cut-in & Removal Project, Licking County, Ohio

Dear Mr. Weller:

This letter is in response to the correspondence received on November 26, 2025, regarding the proposed Curleys Station and Corridor-Conesville 345kV Cut-in & Removal Project located in Jersey Township, Licking County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board (OPSB) rules for siting this project (OAC 4906-4 & 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Cultural Resource Management Review for the Curleys Station and Corridor□Conesville 345kV Cut-in & Removal Project in Jersey Township, Licking County, Ohio* by Ryan J. Weller (Weller & Associates, Inc. 2025). This submission addresses both the Corridor-Conesville 345kV Cut-in & Removal project, as well as the Curleys Station project, as one is located within the other. Per the literature review, the entirety of the project area has been previously addressed through six (6) prior surveys (Weller 2020, 2022, 2024a, 2024b; Weller and McIntosh 2023a, 2023b). These surveys identified three (3) Ohio Archaeological Inventory (OAI) sites (33LI3080, 33LI3081, and 33LI3595); however, our office has previously agreed that these sites are not eligible for the National Register of Historic Places (NRHP). Resources within the architectural Area of Potential Effect (APE) have been previously addressed through other surveys. No additional archaeological survey is recommended.

Based on the information provided, it is our office's opinion that the project, as proposed, will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional cultural resources are discovered during the implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me by e-mail at cgullett@ohiohistory.org. Thank you for your cooperation.

Sincerely,

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

RPR Serial No. 1111881

Department of Natural Resources
ohiodnr.gov

Mike DeWine, *Governor*
Jon Husted, *Lt. Governor*
Mary Mertz, *Director*

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

December 20, 2024

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

Re: 24-1822 - AEP Curley's Station

Project: The proposed project involves the construction of a new greenfield substation on approximately 20 acres.

Location: The proposed project is located in Jersey Township, Licking County, Ohio.

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

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

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

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

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

The project is within the vicinity of records for the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species. Because presence of a state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree

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

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

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

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

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

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

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

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

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

Appendix D Ecological Report

CURLEY'S STATION PROJECT

LICKING COUNTY, OHIO

ECOLOGICAL REPORT

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

Prepared by:

525 Vine Street, Suite 1900
Cincinnati, Ohio 45202

Project #: 60740672

January 2025

TABLES (in-text)

FIGURES

Number

APPENDICES

Number

2.1 WETLAND DELINEATION

The Project Survey Area was evaluated according to the procedures outlined in the United States Army Corps of Engineers (USACE) *Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory, 1987) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)* (USACE, 2012).

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

2.1.1 WETLAND CLASSIFICATION

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

2.1.2 WETLAND ASSESSMENT

Each delineated wetland was assessed following the Ohio Environmental Protection Agency (OEPA) *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) (Mack, 2001). Wetland assessments utilized the 10-page ORAM form, providing a final Category rating for each wetland.

2.2 STREAM ASSESSMENT

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

2.2.3 UPLAND DRAINAGE FEATURES

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

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

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

2.3 RARE, THREATENED, AND ENDANGERED SPECIES

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

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

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

3.2.1 OEPA STREAM ELIGIBILITY

OEPA stream eligibility for 401 WQC mapping was reviewed for the Project Survey Area. The Project occurs within one watershed, Headwaters Blacklick Creek (050600011503), that is designated by 401 WQC as "possibly eligible". The OEPA stream eligibility mapping for the Project Survey Area is provided on **Figure 4**.

3.3 FEMA 100 YEAR FLOODPLAINS

No FEMA regulated floodways, or 100-year floodplains are located within the Project Survey Area (FEMA, 2011).

3.4 PONDS

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

3.5 UPLAND DRAINAGE FEATURES

During the field survey, AECOM identified two upland drainage features within the Project Survey Area. One upland drainage feature identified by AECOM overlaps with a "Grass Swale 1" previously identified by EMH&T and covered under JD: LRH-2022-557-SCR. The extent of the upland drainage features is displayed on **Figures 2** and **3**. Photographs of all delineated upland drainage features are provided in **Appendix D**. A copy of the JD is provided as **Appendix A.**

3.6 VEGETATIVE COMMUNITIES

AECOM ecologists conducted a general habitat survey in conjunction with the stream and wetland field surveys. As described in **Table 2** below, the Project Survey Area contained urban and old field areas. Vegetative communities are depicted visually on aerial photography in **Figure 5**. Representative photographs of the vegetative communities in the Project Survey Area are provided as **Appendix E**.

TABLE 3
ODNR AND USFWS LISTED SPECIES WITHIN THE PROJECT SURVEY AREA

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

Protected Species Agency Summary

No tree clearing is proposed as part of the Project. If tree clearing were to become part of the Project scope of work, the ODNR and the USFWS recommends implementations of seasonal tree clearing between October 1 and March 31 to avoid adverse effects to Indiana bat, northern long-eared bat, little brown bat, and tricolored bat. If trees must be cut during the summer months, the ODNR recommends that a mist net survey could be completed for the little brown bat, and the tricolored bat between June 1 and August 15. However, additional summer surveys would not constitute presence/absence within the Project Survey Area for the Indiana bat or northern long-eared bat. If summer tree clearing is needed, additional coordination would be completed with ODNR and the USFWS.

Regarding potential hibernaculum(a) within the Project area, a desktop hibernaculum(a) review was completed in accordance with the 2024 Ohio ODNR DOW and USFWS Joint Guidance for Bat Surveys and Tree Clearing within 0.25 miles of the Project survey Area (**Appendix F**). No karst features, underground mine openings, surface industrial minerals and historic coal mines were identified are within a 0.25-miles radius of the Project Area that are anticipated to provide suitable hibernacula for cave-dwelling bats as shown in **Appendix B**. Further evaluation and coordination with the ODNR and USFWS are not warranted.

No impacts are anticipated to occur to any fish or reptile species as no suitable habitat was observed within the Project Area. The ODNR noted that the Project is within the range of the northern harrier and identified that open grasslands and wet meadow marshes, of at least 2-acres, is considered nesting habitat for the northern harrier. Based on field and desktop review, the Project survey area was historically associated with agricultural practices and over the last year have been allowed to be fallow, old field habitat. The current habitat would meet the criteria for potential nesting habitat for the northern harrier; however, the site is located within a future customer development that will be occurring prior to this Project activities. As conversion of this habitat to disturbed areas, landscaped, or urban will occur by others prior to the Project activities; no suitable nesting habitat will be present within the Project survey area and no further coordination regarding this listed species is necessary concerning this Project.

4.0 SUMMARY

The ecological field survey did not identify any wetlands or streams within the Project Survey Area. Two UDF’s were identified within the Project Survey Area.

Of the seven state and/or federally listed threatened and endangered species within range of the Project Survey Area, none of the species or their critical habitat were identified for the mammal, fish, reptile, or bird species. Therefore, no further coordination is anticipated to be required to the USFWS and/or ODNR.

5.0 REFERENCES

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

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

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

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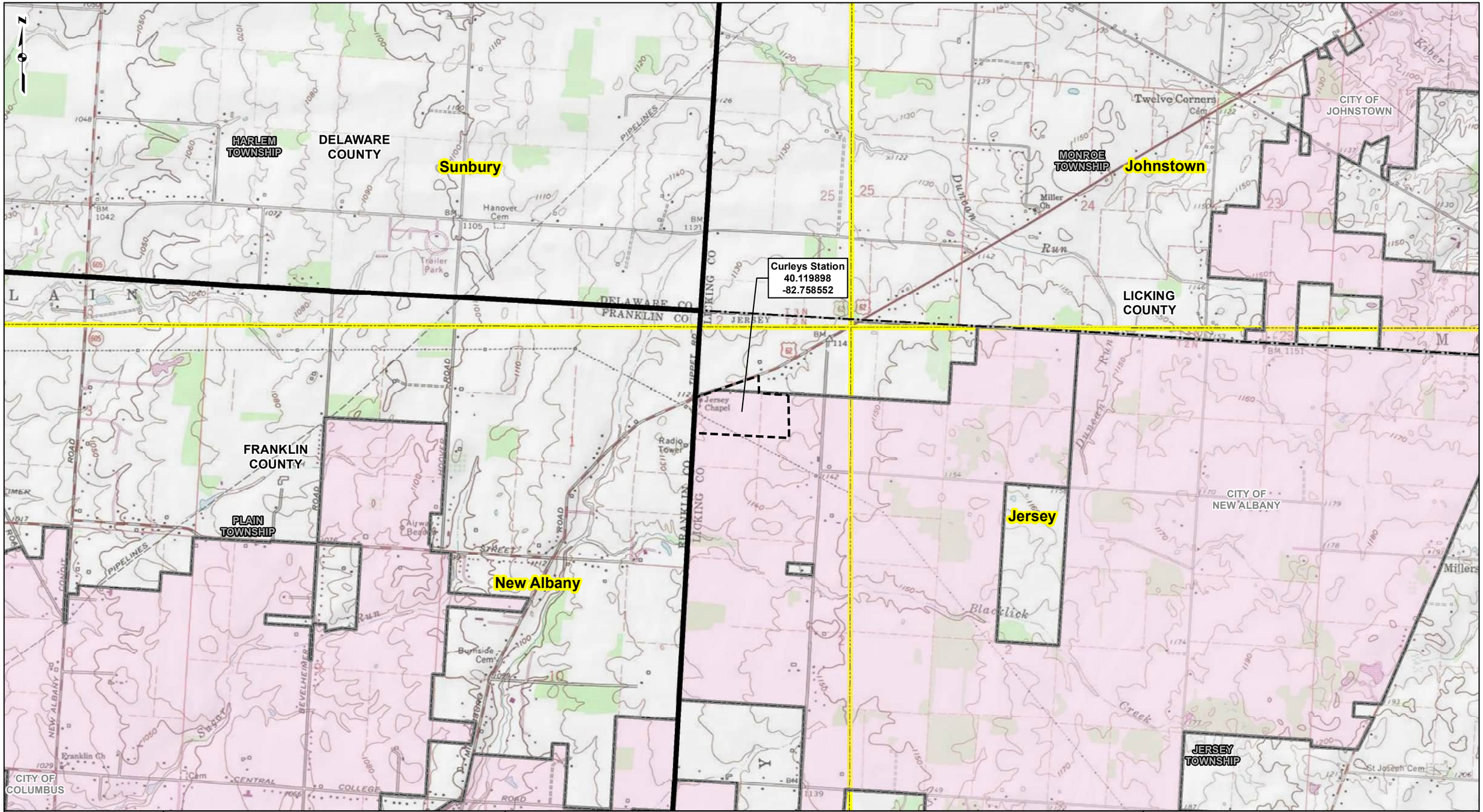


PROJECT LOCATION

LINKING COUNTY, OHIO

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: [UPDATE QUAD INFORMATION], OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 11/2024.

0 1,000 2,000 4,000 Feet

LEGEND

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

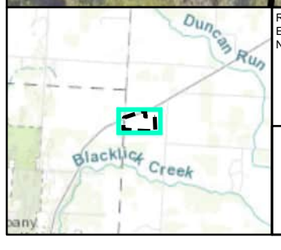
FIGURE 1
PROJECT LOCATION MAP

AECOM

CURLEYS STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: KK
CHECKED: CJT
DATE: 11/19/2024
APPROVED: BJM

X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60740672_AEP_Curleys Station\2_MXDs\1_WDR\CURLEYS_STATION_WDR_FIG_1.mxd



REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 01/2025. NHD, USGS 2024. USGS CONTOURS, 2024

LEGEND

- UPLAND DATA POINT
- CULVERT
- DELINEATED UPLAND DRAINAGE FEATURE
- EMHT GRASS SWALE-1 JD # LRH-2022-557-SCR
- CONTOUR (2FT)
- PROJECT SURVEY AREA
- COUNTY BOUNDARY
- TOWNSHIP BOUNDARY

0 100 200 400 Feet

FIGURE 3
WETLAND DELINEATION AND
STREAM ASSESSMENT MAP

AECOM

CURLEYS STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: KK DATE: 1/9/2025
CHECKED: CJT APPROVED: BJM

X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60740672_AEP_Curleys Station\2_MXDs\1_WDR\CURLEYS_STATION_WDR_FIG_3.mxd

REFERENCE: WORLD IMAGERY (CLARITY), ESRI, ARCGIS ONLINE, ACCESSED 11/2024.

LEGEND

- PHOTO LOCATION POINT
- PROJECT SURVEY AREA
- COUNTY BOUNDARY
- TOWNSHIP BOUNDARY

VEGETATIVE COMMUNITY TYPE

- OLD FIELD
- URBAN

0 100 200 400 Feet

FIGURE 5
VEGETATIVE COMMUNITIES ASSESSMENT MAP

AECOM

CURLEYS STATION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: KK DATE: 11/20/2024
CHECKED: CJT APPROVED: BJM

X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60740672_AEP_Curleys Station\2_MXDs\1_WDR\CURLEYS_STATION_WDR_FIG_5.mxd

DEPARTMENT OF THE ARMY
HUNTINGTON DISTRICT, CORPS OF ENGINEERS
502 EIGHTH STREET
HUNTINGTON, WEST VIRGINIA 25701-2070

REPLY TO ATTENTION OF

August 8, 2022

Regulatory Division
North Branch
LRH-2022-557-SCR

APPROVED AND PRELIMINARY JURISDICTIONAL DETERMINATIONS

Mr. Dick Roggenkamp
The New Albany Company
8000 Walton Parkway, Suite 120
New Albany, Ohio 43054

Dear Mr. Roggenkamp:

I refer to the *Investigation of Waters of the United States, North Beech Corridor, Plain/ Jersey Townships, Franklin/Licking Counties, Ohio,* completed by EMH&T and submitted to this office on July 1, 2022 with additional information received on July 11, 2022. You have requested a preliminary jurisdictional determination (JD) for the potential jurisdictional aquatic resources and an approved jurisdictional determination for the non-jurisdictional features on the approximate 672-acre site. The JD review area is located east and west of Beech Road, north and south of Miller Road, and south and east of U.S. 62 (Johnstown Road) Plain/Jersey Townships, Franklin and Licking Counties, Ohio at approximately 40.11512 latitude, -82.75260 longitude. On-site waters flow to Blacklick Creek, an indirect tributary of the Scioto River, a traditional navigable water of the United States. We have assigned the following file number to your PCN: LRH-2022-557-SCR. Please reference this file number on all future correspondence related to this subject proposal.

The United States Army Corps of Engineers' (Corps) authority to regulate waters of the United States is based on the definitions and limits of jurisdiction contained in 33 CFR 328 and 33 CFR 329. Section 404 of the Clean Water Act (Section 404) requires a DA permit be obtained prior to discharging dredged and/or fill material into waters of the United States, including wetlands. Section 10 of the Rivers and Harbors Act of 1899 (Section 10) requires a DA permit be obtained for any work in, on, over or under a navigable water.

Preliminary Jurisdictional Determination

Based upon a review of the information provided, this office has determined 5.78 acres of nine (9) wetlands (Wetland H, I, K, L, M, S, T, U, and V) and 6,276 linear feet (0.805 acre) of five (5) streams (Streams 1-5) are located within the preliminary JD boundary. The aquatic resources identified above and on the enclosed preliminary JD form may be waters of the United States in accordance with the Regulatory Guidance Letter for JDs issued by the Corps on October 31, 2016 (Regulatory Guidance Letter No. 16-01). As indicated in the guidance, this

This jurisdictional verification is valid for a period of five (5) years from the date of this letter unless new information warrants revision of the delineation prior to the expiration date. This letter contains an approved JD for the subject site within the approved JD boundary. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the Great Lakes and Ohio River Division Office at the following address:

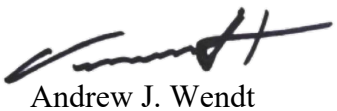
Regulatory Administrative Appeals Officer
United States Army Corps of Engineers
Great Lakes and Ohio River Division
550 Main Street, Room 10780
Cincinnati, Ohio 45202-3222
Phone: (513) 684-2699
Fax: (513) 684-2460

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

This determination has been conducted to identify the limits of the Corps' Section 404 jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are United States Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.

If you have any questions concerning the above, please contact Cecil Cox of the North Branch at 304-399-5274, by mail at the above address, or by email at cecil.m.cox@usace.army.mil.

Sincerely,



Andrew J. Wendt
Regulatory Project Manager
North Branch

Enclosures
cc:
Bryan Lombard via email

Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

Re: North Beech Corridor East
Permit - Intermediate Approval
401 Wetlands
Licking
DSW401228313W

April 3, 2023

Brent Bradbury
MBJ Holdings, LLC
8000 Walton Pkwy, Ste 120
New Albany, OH 43054
bbradbury@newalbanycompany.com

Subject: North Beech Corridor East
Licking County / Jersey Township
Grant of a Level Three Isolated Wetland Permit
Ohio EPA ID No. 228313W

Dear Stakeholders:

I hereby authorize the above referenced project under the following authorities, and it is subject to the following modifications and/or conditions:

Ohio Isolated Wetland Permit

Pursuant to Ohio Revised Code Chapter 6111, I hereby conclude that the above-referenced project will comply with the applicable provisions of Ohio Revised Code Sections 6111.02 through 6111.028. This authorization is specifically limited to an Ohio Isolated Wetlands Permit (here after referred to as "permit") with respect to water pollution and does not relieve the Permittee of further Certifications or Permits as may be necessary under the law. I have determined that a lowering of water quality in the Upper Scioto Watershed (HUC 05060001) as authorized by this permit is necessary. I have made this determination based upon the consideration of all public comments, if submitted, and the technical, social, and economic considerations concerning this application and its impact on waters of the state. In accordance with ORC Section 6111.021(C), this permit shall serve as the state's 401 water quality certification to the extent that any of these waters are deemed jurisdictional under the Federal Water Pollution Control Act.

F. Unpermitted impacts to surface water resources and/or their buffers occurring as a result of this project must be reported within 24 hours of occurrence to Ohio EPA, Division of Surface Water, Section 401 Manager (614-644-2001), for further evaluation.

G. Pesticide application(s) for the control of plants and animals shall be applied in accordance with the NPDES General Permit to Discharge Pesticides In, Over or Near Waters of the State available at: https://epa.ohio.gov/static/Portals/35/permits/OHG870002_FINAL_PERMIT.pdf and may require a pesticide applicator license from the Ohio Department of Agriculture.

H. Any authorized representative of the director shall be allowed to inspect the authorized activity at reasonable times to ensure that it is being or has been accomplished in accordance with the terms and conditions of this permit.

I. In the event that there is a conflict between the permit application, and the conditions within this permit, the condition shall prevail unless Ohio EPA agrees, in writing, that the permit application or other provision prevails.

J. The Permittee shall provide electronic maps of the development area to Ohio EPA 401 WQC and Isolated Wetland Permitting Section within 30 days of the date of this permit. When sending the electronic files, include the Ohio EPA ID Number and the Army Corps of Engineers Number (if applicable). If possible, these electronic maps shall be GIS shape files or Geodatabase files. If this is not possible, the electronic maps shall be in another electronic format readable in GIS (GIF, TIF, etc). The electronic files shall be sent to the following e-mail address: EPA.401Webmail@epa.ohio.gov

If the files are too large to send by e-mail (over 25 MB), a disk containing the electronic files shall be mailed to the following address:

Ohio Environmental Protection Agency
Division of Surface Water
Attn: 401 Section Manager
50 West Town Street, Suite 700
PO Box 1049
Columbus, OH 43216-1049

K. This proposal may require other permits from Ohio EPA. For information concerning application procedures, contact the Ohio EPA District Office as follows:

7. Chemically treated lumber which may include, but is not limited to, chromated copper arsenate (CCA) and creosote treated lumber shall not be used in structures that come into contact with waters of the state.

8. Trees removed from temporary impact areas to facilitate construction shall be replaced with appropriate tree species native to Ohio.

PART III MITIGATION

A. Description of Required Mitigation

As mitigation for 5.09 acres of forested Category 2 wetlands, the permittee shall deduct 3.06 credits from their Rocky Fork Pooled Wetland Mitigation Site and 9.67 credits from their Avis Road Pooled Wetland Mitigation Site, both located within the Upper Scioto Watershed (HUC 05060001).

B. Reporting

1. Annual Update Reports

A project construction update report shall be submitted to Ohio EPA by December 31 of each year following the date of this permit and until project construction is complete. Each update report shall contain, at a minimum, the following information:

a. The status of the filling activities at the development site including dates filling was started and completed, or are expected to be started and completed. If filling activities have not been completed, a drawing shall be provided, which shows the locations and acreage/feet of wetlands/streams that have not yet been filled. If filling activities have been completed, then as-built drawings shall be submitted, which show where fill was placed.

b. Current contact information for all responsible parties including phone number, e-mail, and mailing addresses. For the purposes of this condition, responsible parties include, but may not be limited to the Permittee, consultant, and project construction manager.

c. As-built drawings sized 11" by 17" (to scale) of each of the construction areas, once construction is complete.

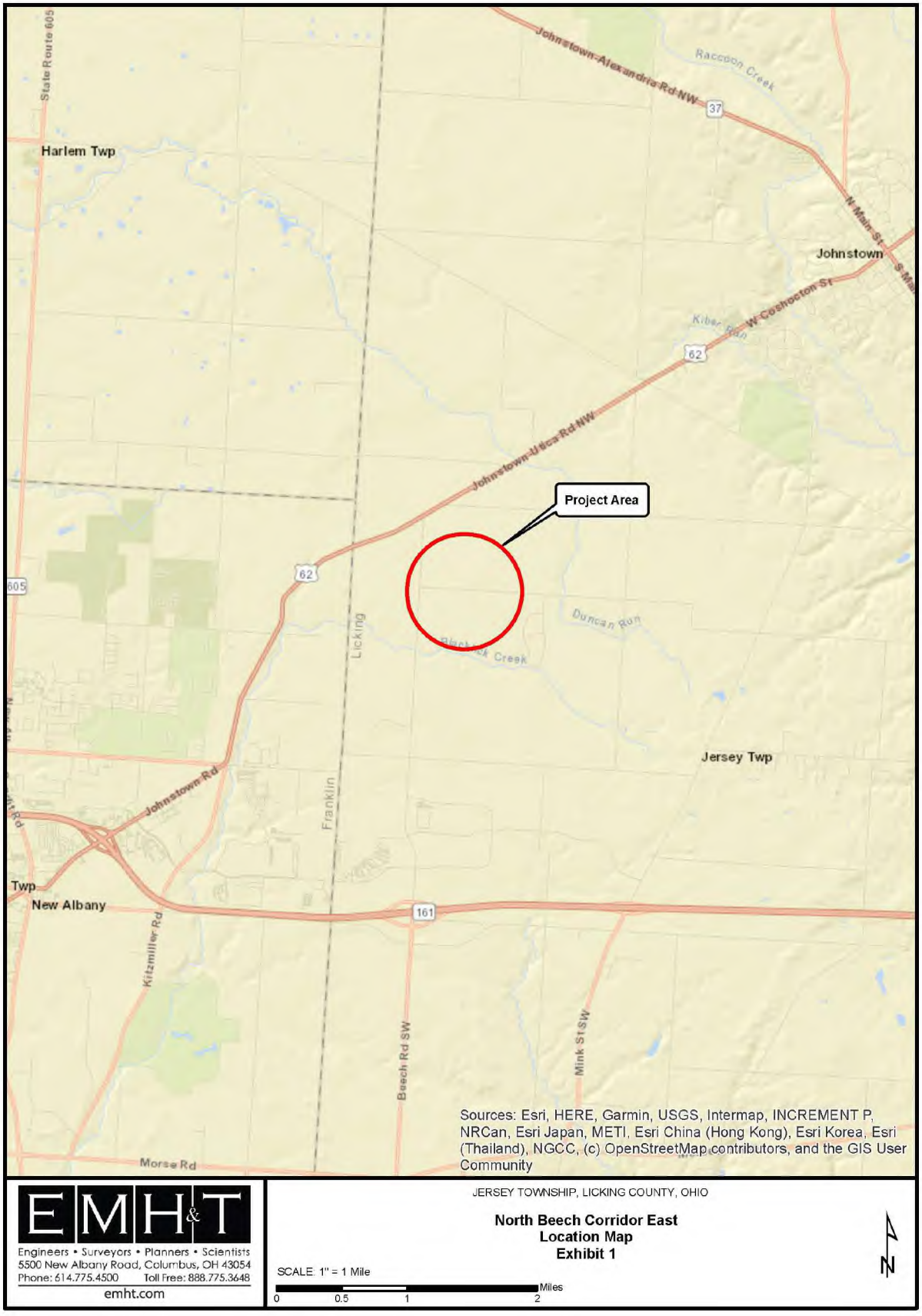
PART IV NOTIFICATIONS TO OHIO EPA

All notifications, correspondence, and reports regarding this permit shall reference the following information:

Diana Welling, dwelling@ohiohistory.org, Ohio Historical Preservation Office
Matt Lamoreaux, Matthew.Lamoreaux@epa.ohio.gov, Ohio EPA, DSW, 401/Wetlands/Mitigation Section
Andrea Kilbourne, Andrea.Kilbourne@epa.ohio.gov, Ohio EPA, DSW, Mitigation Coordinator
Mike Gallaway, Michael.Gallaway@epa.ohio.gov, Ohio EPA, DSW CDO
Vince Messerly, vmesserly@streamandwetlands.org, Stream + Wetlands Foundation
Richard Roggenkamp, droggenkamp@newalbanycompany.com, MBJ Holdings, LLC
Heather Dardinger, hdardinger@emht.com, EMH&T

Attachments: Site Location Map (project)
Response to Comments

Ohio EPA has developed a customer service survey to get feedback from regulated entities that have contacted Ohio EPA for regulatory assistance, or worked with the Agency to obtain a permit, license or other authorization. Ohio EPA's goal is to provide our customers with the best possible customer service, and your feedback is important to us in meeting this goal. Please take a few minutes to complete this survey and share your experience with us at http://www.surveymonkey.com/s/ohioepacustomersurvey.



EMH&T
Engineers • Surveyors • Planners • Scientists
5500 New Albany Road, Columbus, OH 43054
Phone: 614.775.4500 Toll Free: 888.775.3648
emht.com

JERSEY TOWNSHIP, LICKING COUNTY, OHIO

North Beech Corridor East
Location Map
Exhibit 1

SCALE: 1" = 1 Mile

0 0.5 1 2 Miles

N

Comment 2: **Several commentors raised concerns about potential loss of groundwater recharge from wetlands proposed for impacts.**

Response 2: Ohio EPA reviewed information provided in the application as well as the response to technical comments that indicates the soils located on-site have poor potential for groundwater recharge.

Comment 3: **Commentors asked if alternative stormwater controls were an option to maintain groundwater recharge and flood attenuation.**

Response 3: See response to Comment 1 and 2. Also, the end user will evaluate alternative stormwater controls where practically feasible (e.g. pervious pavement for employee parking lots and sidewalks).

Protection of existing water resources

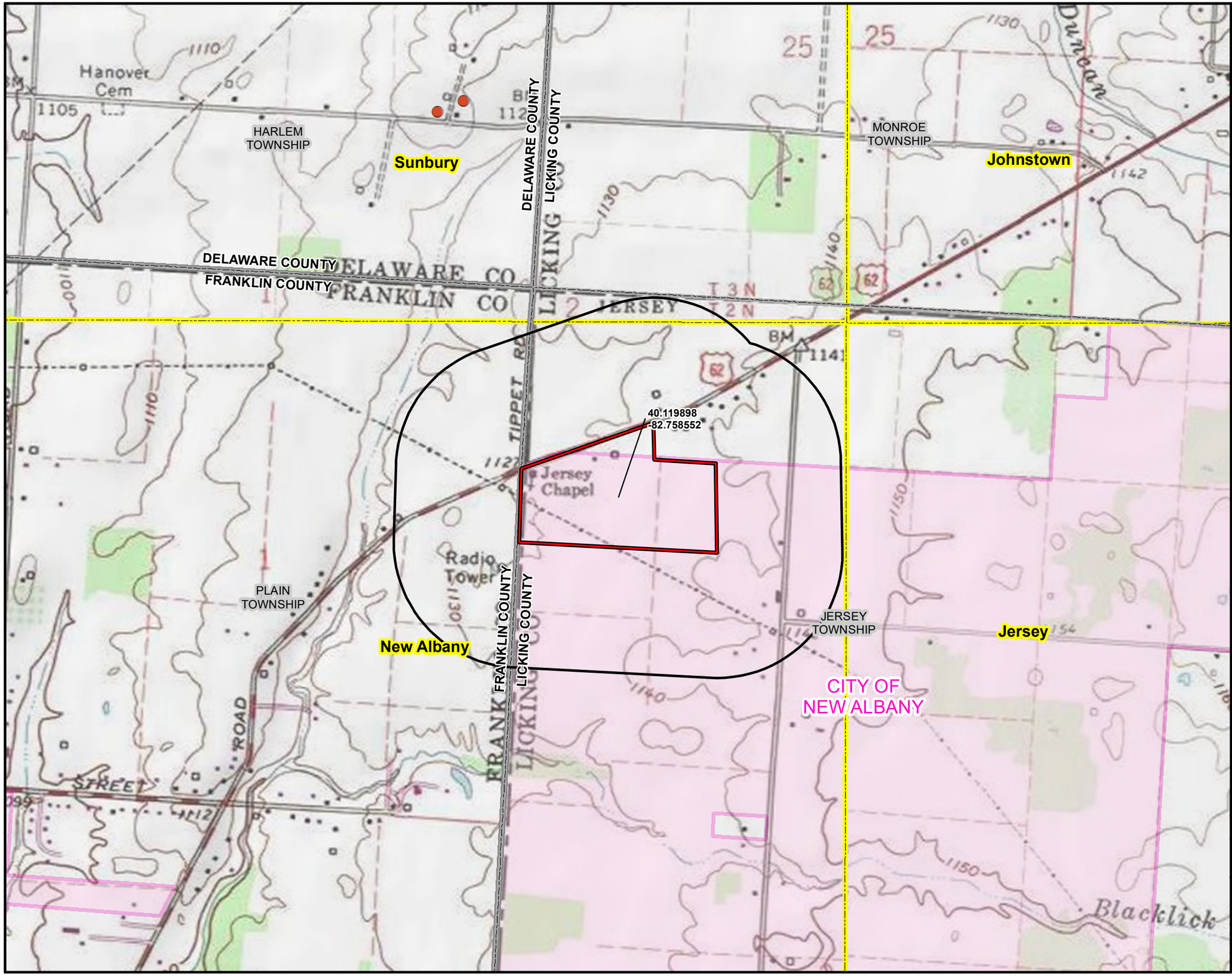
Comment 4: **One commentor asked if the development of the site could avoid water resources by constructing upwards.**

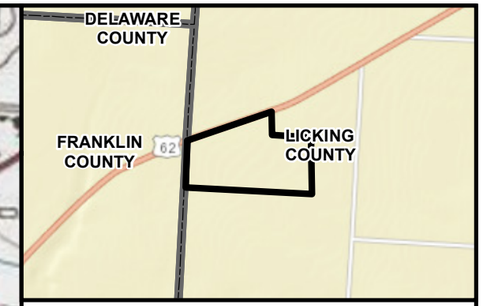
Response 4: The project as proposed includes two-story data center buildings. Building height is regulated by local zoning laws and is limited due to the necessary management of heat generated by the servers within the buildings.

Comment 5: **Several commentors suggested an assessment of how the construction projects within the Blacklick Creek watershed are impacting the watershed.**

Response 5: Blacklick Creek is currently designated warmwater habitat, meeting Ohio's water quality standards. Additionally, Ohio EPA is scheduled to perform biological and water quality monitoring within the Blacklick Creek Watershed this year. The Quality Assurance Project Plan is listed on Ohio EPA's website and is available for comment until April 19, 2023, https://epa.ohio.gov/divisions-and-offices/surface-water/reports-data/water-quality-programs.

End of Response to Comments





Legend

- AECOM TE Substation Review Area
- Quarter Mile Review Area
- County Boundary
- Township Boundary
- City Boundary
- Ohio USGS 7.5' Topographic Quadrangle

ODNR Karst Points

- Karst - Field Verified

N

0 500 1,000 2,000

Feet

AMERICAN ELECTRIC POWER

Curleys Station Project

APPENDIX B

DESKTOP ASSESSMENT FOR WINTER BAT HABITAT

DATE: 11/19/2024	1 INCH = 1,000 FEET
CREATED BY: BGI	CHECKED BY: JH
JOB NO.: 60740672	AECOM

Date Saved: 11/19/2024
Document Path: X:\DCS\GIS\ArcMap_GeoDB_Projects\ENV\60740672_AEP_Curleys Station\2_MXDs\0_TE\Curleys_Station_ODNRFigure1_Topo_Overview_20241104.mxd

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

OMB Control #: 0710-0024, Exp:11/30/2024
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Curley Projects | City/County: Licking County | Sampling Date: 11/01/2024
Applicant/Owner: AEP | State: OH | Sampling Point: UPL-AGS-001
Investigator(s): AGS & TJK | Section, Township, Range: T2N R15W
Landform (hillside, terrace, etc.): Plain | Local relief (concave, convex, none): None
Slope (%): 1 | Lat: 40.119510 | Long: -82.755596 | Datum: NAD 83
Soil Map Unit Name: BeB: Bennington silt loam, 2 to 6 percent slopes | NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If no, explain in Remarks.)
Are Vegetation____, Soil____, or Hydrology____ significantly disturbed? Are "Normal Circumstances" present? Yes X 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 X
Hydric Soil Present?	Yes ____	No X
Wetland Hydrology Present?	Yes ____	No X

Is the Sampled Area within a Wetland? Yes ____ No X

Remarks:
UPL-AGS-001 is an upland data point located in an old field. There are signs of past agricultural activity, but there is no evidence of recent disturbances. The source of hydrology is precipitation.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' Radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Sapling/Shrub Stratum (Plot size: 15' Radius)			
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Herb Stratum (Plot size: 5' Radius)			
1. *Setaria viridis*	50	Yes	UPL
2. *Solidago canadensis*	20	Yes	FACU
3. *Setaria pumila*	10	No	FAC
4. *Symphyotrichum lateriflorum*	10	No	FACW
5. *Trifolium pratense*	5	No	FACU
6. *Epilobium ciliatum*	5	No	FACW
7.			
8.			
9.			
10.			
	100 =Total Cover		
Woody Vine Stratum (Plot size: 30' Radius)			
1.			
2.			
	=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: 0.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	15	x 2 =	30
FAC species	10	x 3 =	30
FACU species	25	x 4 =	100
UPL species	50	x 5 =	250
Column Totals:	100 (A)		410 (B)

Prevalence Index = B/A = 4.10

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 X

Remarks: (Include photo numbers here or on a separate sheet.)
Hydrophytic vegetation is not present.

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

OMB Control #: 0710-0024, Exp:11/30/2024
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Curley Projects | City/County: Licking County | Sampling Date: 11/01/2024
Applicant/Owner: AEP | State: OH | Sampling Point: UPL-AGS-002
Investigator(s): AGS & TJK | Section, Township, Range: T2N R15W
Landform (hillside, terrace, etc.): Plain | Local relief (concave, convex, none): None
Slope (%): 1 | Lat: 40.119130 | Long: -82.758118 | Datum: NAD 83
Soil Map Unit Name: BeB: Bennington silt loam, 2 to 6 percent slopes | NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If no, explain in Remarks.)
Are Vegetation____, Soil____, or Hydrology____ significantly disturbed? Are "Normal Circumstances" present? Yes X 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 X
Hydric Soil Present?	Yes ____	No X
Wetland Hydrology Present?	Yes ____	No X

Is the Sampled Area within a Wetland? Yes ____ No X

Remarks:
UPL-AGS-002 is an upland data point located in an old field. There are signs of past agricultural activity, but there is no evidence of recent disturbances. The source of hydrology is precipitation.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' Radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Sapling/Shrub Stratum (Plot size: 15' Radius)			
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Herb Stratum (Plot size: 5' Radius)			
1. *Setaria viridis*	60	Yes	UPL
2. *Setaria pumila*	20	Yes	FAC
3. *Solidago canadensis*	10	No	FACU
4. *Symphyotrichum lateriflorum*	10	No	FACW
5.			
6.			
7.			
8.			
9.			
10.			
	100 =Total Cover		
Woody Vine Stratum (Plot size: 30' Radius)			
1.			
2.			
	=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: 50.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	10	x 2 =	20
FAC species	20	x 3 =	60
FACU species	10	x 4 =	40
UPL species	60	x 5 =	300
Column Totals:	100 (A)		420 (B)

Prevalence Index = B/A = 4.20

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 X

Remarks: (Include photo numbers here or on a separate sheet.)
Hydrophytic vegetation is not present.

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

OMB Control #: 0710-0024, Exp:11/30/2024
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Curley Projects | City/County: Licking County | Sampling Date: 11/01/2024
Applicant/Owner: AEP | State: OH | Sampling Point: UPL-AGS-003
Investigator(s): AGS & TJK | Section, Township, Range: T2N R15W
Landform (hillside, terrace, etc.): Plain | Local relief (concave, convex, none): None
Slope (%): 1 | Lat: 40.119766 | Long: -82.760142 | Datum: NAD 83
Soil Map Unit Name: BeA: Bennington silt loam, 0 to 2 percent slopes | NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If no, explain in Remarks.)
Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes X 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 X
Hydric Soil Present?	Yes ____	No X
Wetland Hydrology Present?	Yes ____	No X

Is the Sampled Area within a Wetland? Yes ____ No X

Remarks:
UPL-AGS-003 is an upland data point located in an old field. There are signs of past agricultural activity, but there is no evidence of recent disturbances. The source of hydrology is precipitation.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' Radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Sapling/Shrub Stratum (Plot size: 15' Radius)			
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Herb Stratum (Plot size: 5' Radius)			
1. *Setaria viridis*	60	Yes	UPL
2. *Solidago rugosa*	20	Yes	FAC
3. *Setaria pumila*	10	No	FAC
4. *Symphyotrichum lateriflorum*	5	No	FACW
5. *Dactylis glomerata*	5	No	FACU
6.			
7.			
8.			
9.			
10.			
	100 =Total Cover		
Woody Vine Stratum (Plot size: 30' Radius)			
1.			
2.			
	=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: 50.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	5	x 2 =	10
FAC species	30	x 3 =	90
FACU species	5	x 4 =	20
UPL species	60	x 5 =	300
Column Totals:	100 (A)		420 (B)
Prevalence Index = B/A =			4.20

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 X

Remarks: (Include photo numbers here or on a separate sheet.)
Hydrophytic vegetation is not present.

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

OMB Control #: 0710-0024, Exp:11/30/2024
Requirement Control Symbol EXEMPT:
(Authority: AR 335-15, paragraph 5-2a)

Project/Site: Curley Projects | City/County: Licking County | Sampling Date: 11/01/2024
Applicant/Owner: AEP | State: OH | Sampling Point: UPL-AGS-004
Investigator(s): AGS & TJK | Section, Township, Range: T2N R15W
Landform (hillside, terrace, etc.): Plain | Local relief (concave, convex, none): None
Slope (%): 1 | Lat: 40.119287 | Long: -82.761429 | Datum: NAD 83
Soil Map Unit Name: Pe: Pewamo silty clay loam, low carbonate till, 0 to 2 percent slopes | NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If no, explain in Remarks.)
Are Vegetation____, Soil____, or Hydrology____ significantly disturbed? Are "Normal Circumstances" present? Yes X 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 X
Hydric Soil Present?	Yes ____	No X
Wetland Hydrology Present?	Yes ____	No X

Is the Sampled Area within a Wetland? Yes ____ No X

Remarks:
UPL-AGS-004 is an upland data point located in an old field. There are signs of past agricultural activity, but there is no evidence of recent disturbances. The source of hydrology is precipitation.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30' Radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Sapling/Shrub Stratum (Plot size: 15' Radius)			
1.			
2.			
3.			
4.			
5.			
	=Total Cover		
Herb Stratum (Plot size: 5' Radius)			
1. *Setaria pumila*	55	Yes	FAC
2. *Setaria viridis*	30	Yes	UPL
3. *Solidago canadensis*	5	No	FACU
4. *Symphyotrichum lateriflorum*	5	No	FACW
5. *Cirsium arvense*	5	No	FACU
6.			
7.			
8.			
9.			
10.			
	100 =Total Cover		
Woody Vine Stratum (Plot size: 30' Radius)			
1.			
2.			
	=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: 50.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	5	x 2 =	10
FAC species	55	x 3 =	165
FACU species	10	x 4 =	40
UPL species	30	x 5 =	150
Column Totals:	100 (A)		365 (B)
Prevalence Index = B/A =	3.65		

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 X

Remarks: (Include photo numbers here or on a separate sheet.)
Hydrophytic vegetation is not present.

AECOM Imagine it. Delivered.

PHOTOGRAPHIC RECORD
Upland Photograph Record

Client Name:	Site Location:	Project No.
AEP	Curleys Station	60740672

UPL-AGS-001	
Date: November 01, 2024	
Description: Upland Facing North	

UPL-AGS-001	
Date: November 01, 2024	
Description: Upland Facing East	

AECOM Imagine it. Delivered.

PHOTOGRAPHIC RECORD
Upland Photograph Record

Client Name:	Site Location:	Project No.
AEP	Curleys Station	60740672

UPL-AGS-001

Date:

November 01, 2024

Description:

Upland

Facing Soil

UPL-AGS-002

Date:

November 01, 2024

Description:

Upland

Facing North

AECOM Imagine it. Delivered.

PHOTOGRAPHIC RECORD

Upland Photograph Record

Client Name:	Site Location:	Project No.
AEP	Curleys Station	60740672

UPL-AGS-002

Date:

November 01, 2024

Description:

Upland

Facing West

UPL-AGS-002

Date:

November 01, 2024

Description:

Upland

Facing Soil

AECOM Imagine it. Delivered.

PHOTOGRAPHIC RECORD
Upland Photograph Record

Client Name:	Site Location:	Project No.
AEP	Curleys Station	60740672

UPL-AGS-003

Date:

November 01, 2024

Description:

Upland

Facing South

UPL-AGS-003

Date:

November 01, 2024

Description:

Upland

Facing West

AECOM Imagine it. Delivered.

PHOTOGRAPHIC RECORD
Upland Photograph Record

Client Name:	Site Location:	Project No.
AEP	Curleys Station	60740672

UPL-AGS-004

Date:

November 01, 2024

Description:

Upland

Facing East

UPL-AGS-004

Date:

November 01, 2024

Description:

Upland

Facing South

APPENDIX D

UPLAND DRAINAGE FEATURE PHOTOGRAPHIC RECORD

AECOM Imagine it. Delivered.

PHOTOGRAPHIC RECORD
Upland Drainage Feature (UDF) Photograph Record

Client Name:	Site Location:	Project No.
AEP	Curleys Station	60740672

UDF-AGS-001 **Date:** November 01, 2024 **Description:** Upland Drainage Feature Facing Substrate	

EMH&T Grass Swale 1 / UDF-AGS-002 **Date:** November 01, 2024 **Description:** Upland Drainage Feature Facing Up	

APPENDIX E

HABITAT PHOTOGRAPHIC RECORD

APPENDIX F

AGENCY CORRESPONDENCE

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

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

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

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

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

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

United States Department of the Interior

FISH AND WILDLIFE SERVICE

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

December 12, 2024

Project Code: 2025-0021577

Dear Jesse Killosky:

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

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

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

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

OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE (OH-FIELD OFFICE) JOINT GUIDANCE FOR BAT SURVEYS AND TREE CLEARING MAY 2024

This document has been updated with new state guidance for the 2024 field season.

This guidance applies to state recommendations only. Contact the USFWS to determine if federal consultation is also necessary to comply with federal law.

Agency Contacts:

ODNR-DOW Permit Coordinator: Wildlife.Permits@dnr.ohio.gov, (614) 265-6315
ODNR-DOW Bat Survey Coordinator: Eileen Wyza, Eileen.Wyza@dnr.ohio.gov, (614) 265-6764
USFWS OHFO Endangered Species: Angela Boyer, angela_boyer@fws.gov, (614) 416-8993, ext.122

Covid-19 Guidance:

Surveyors should follow all covid protocols put in place by their agency. All surveyors should wear masks when handling bats and anyone exhibiting symptoms of covid-19 should not participate in bat surveys.

Ohio Mist-net Surveys:

This document serves as guidance for bat mist netting activities in Ohio and does not supersede any requirements listed on your permits or facility certificate. All permit conditions must be strictly adhered to for permits to be valid and for renewal of permits beyond the existing year.

Due to the presence of White-nose Syndrome (WNS), mist-netting in Ohio must be conducted between June 1 and August 15 unless stated otherwise in your state permit. The ODNR Division of Wildlife (ODNR-DOW) and U.S. Fish and Wildlife Service (USFWS) Ohio Field Office (OHFO) have determined that delaying netting activities until June 1 will provide additional recovery time for bats affected by WNS. For presence/probable absence surveys, netting will not be accepted outside of the June 1 - August 15 timeframe.

To assess project areas for presence or probable absence of the state and federally listed Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) during summer residency, the USFWS developed the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (March 2024). This protocol may also be used for the tricolored bat (*Perimyotis subflavus*) which is state endangered and proposed to be federally endangered. **With minor modifications referenced below**, it can also be used in Ohio for the 2024 field season and includes surveying for the state-listed little brown bat (*Myotis lucifugus*).

According to the updated federal range-wide guidelines, presence/probable absence net surveys for northern long-eared bats or federally-proposed tricolored bats shall incorporate either 10 net nights per square 0.5 kilometer (123

At a minimum, for each detector site/night a program considered presence of state-listed bats likely, review all files (including no IDs) from that site/night. If more than one acoustic bat ID program is used, qualitative analysis must also include a comparison of the results of each program by site and night.

Combined Mist-netting and Acoustic Surveys:
ODNR-DOW will accept the USFWS pilot survey option of combining mist-netting and acoustic surveys for traditional survey sites (e.g., 123-acre area) detailed in Appendix I of the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Summer Survey Guidelines (2024). All presence/absence combined mist-net and acoustic surveys conducted for state listed bat species should follow the highest minimum level of effort set forth by the federal guidance to be considered valid by ODNR-DOW. Any modifications to this position will be communicated at the time of the site authorization approval.

Before Field Season:

- Anyone surveying bats using mist-nets in the state of Ohio must obtain a federal permit as well as a state scientific collection permit. The federal permit should include both the Indiana bat and the northern long-eared bat.
- Your ODNR-DOW permit consists of two documents: a Scientific Collector (Wild Animal) Permit and an endangered species letter signed by the Chief of the Division of Wildlife (in addition to your federal permit). Both ODNR-DOW documents must be obtained prior to field work and kept with you and any sub-permittees during field work.

During Field Season:

- Prior to initiation of field work (a minimum of two weeks in advance), permittees must provide proposed mist netting plans to USFWS and ODNR-DOW in the form of an e-mail letter to the USFWS OHFO and copy to the ODNR-DOW Bat Survey Coordinator. Plans must be reviewed and approved by USFWS OHFO and ODNR-DOW before ANY surveys take place. Study plans must specify objectives, location details, dates of proposed work, and all other relevant details. **Study plans must also include a USFWS Project Code. Project Codes can only be obtained by requesting an official species list through the USFWS's Information for Planning and Consultation (IPaC) website: (https://ipac.ecosphere.fws.gov/).** When handling bats, you must strictly adhere to the current WNS Decontamination Protocol (current version can be found at https://www.whitenosesyndrome.org/topics/decontamination). Clothing, boots, gear, and equipment should all be thoroughly decontaminated between nights, as well as between netting sites.
- Request bat bands at least two weeks in advance of needing them. Bat bands can be obtained by e-mailing the ODNR-DOW Bat Survey Coordinator with how many bands are needed, current permit number, sizes, and a mailing address. Bands will not be issued until your permits are valid. We have three sizes of bands—2.4 mm, 2.9 mm, and 4.2 mm. The 2.4 mm split metal bat ring made of aluminum alloy is suitable for banding tricolored bats. 2.9 mm bands are suitable for Indiana, northern long-eared, and little brown bats. The larger 4.2 mm band is suitable for silver-haired (*Lasionycteris noctivagans*), big brown (*Eptesicus fuscus*), and hoary (*Lasiurus cinereus*) bats. You must band all Indiana, northern long-eared, little brown, and tricolored bats with ODNR-DOW bands; therefore, you should not be in the field without the 2.4 mm and 2.9 mm sized bands.
  NOTE: While ODNR-DOW obtains 2.9 mm bands per new 2024 USFWS guidelines, banding of endangered *Myotis* species should not be done until 2.9 mm bands are received. Please watch for updates from the Wildlife Permits email and request 2.9 mm bands when they become available.
- Only individuals who are named on the ODNR-DOW endangered species letter portion of the permit and on the corresponding federal bat permit may conduct and oversee mist-net surveys. Trained assistants may work on permitted bat activities under the direct and on-site supervision of a named permittee. All bat IDs must be verified by a named permittee. If an Indiana bat, northern long-eared bat, and/or tricolored bat is captured, the permittee shall notify the USFWS and the ODNR-DOW Bat Survey Coordinator referenced

- **NOTE**: The USFWS Range-wide Indiana Bat Guidelines, Appendix H, contains instructions for completing a habitat assessment for Indiana bat, but can be applied to other bat species.

Step 2: Conduct, a presence/absence survey following current ODNR-DOW guidelines, where applicable.

Step 3: <u>If a state-listed endangered bat is captured or recorded during the survey:</u>

- Recommendation of no summer tree cutting, or limited cutting following guidelines detailed below, within 5 miles of an Indiana bat or little brown bat capture or 3 miles of a northern long-eared bat and/or tricolored bat capture if a roost is not located.
- Recommendation of no summer tree cutting, or limited cutting following guidelines detailed below, within a minimum of 2.5 miles of an Indiana bat or little brown bat roost or 1.5 miles of a northern long-eared bat and/or tricolored bat roost tree if located.
- Recommended tree clearing dates within capture record buffers are October 1 – March 31

<u>If no state-listed endangered bat is captured or recorded during the survey:</u>

- Summer tree cutting may proceed for 5 years before a new survey is needed under state guidance.

<u>Limited summer tree cutting guidance for little brown bats:</u> Limited tree cutting in summer may be permitted after consultation with ODNR-DOW, but clearing trees with the following characteristics should be avoided unless they pose a hazard: dead or live trees of any size with loose, shaggy bark; crevices, holes, or cavities; clusters of dead leaves; live trees of any species with DBH ≥ 20".

linear projects, there must be at least one net night of survey on two different nights (minimum of two nights). This does not allow for two net nights on a single night for surveys.

How long are the results of the surveys valid for an assessment of an area?

Mist-net or acoustic surveys documenting probable absence of state-listed endangered bats are valid for five years.

When can acoustic or net surveys occur in Ohio?

In Ohio, acoustic or net surveys may only be conducted from June 1 through August 15 unless indicated otherwise in your state permit. Any surveys outside of the June 1 - August 15 timeframe cannot be used in Ohio to assess the presence/probable absence of state-listed bats.

Can a presence/probable absence survey be conducted within a known bat capture/detection buffer?

Surveys generally cannot be used to document presence/probable absence of state-listed endangered bats where presence of the species has already been confirmed by prior surveys.

What if a project is proposing to clear trees between April 1 and September 30 when bats may be present but no bat records exist in the project area?

Any Ohio project that is not within a known bat record buffer, and tree clearing between April 1 and September 31 is being proposed, may have a presence/probable absence survey conducted between June 1 and August 15 following the range-wide guidance. If a presence/probable absence survey is not performed, presence of listed bats is assumed.

Where do I get bands?

If you need bands, email the ODNR-DOW Bat Survey Coordinator at least two weeks in advance with your current ODNR permit number, how many bands in each size (2.4 mm, 2.9 mm, and 4.2 mm) you will need this season, and a current address to ship the bands.

Do I have to band every bat?
No, currently this is optional. However, you are required as per your state permit to band all Indiana, northern long-eared, little brown, and tricolored bats.
NOTE: While ODNR-DOW obtains 2.9 mm bands per new 2024 USFWS guidelines, banding of endangered *Myotis* species should not be done until 2.9 mm bands are received. Please watch for updates from the Wildlife Permits email and request 2.9 mm bands when they become available.

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Summary: Application LON, Curleys Station Project electronically filed by Jared M Klaus on behalf of AEP Ohio Transmission Company, Inc..