AMERICAN TRANSMISSION SYSTEMS, INCORPORATED
A FIRSTENERGY COMPANY

CONSTRUCTION NOTICE

FOWLES-FOX 138 KV Q-12 TRANSMISSION LINE, FOWLES-FOX 138 KV Q-13TRANSMISSION LINE, FOWLES-NASA 138 KV Q-17 TRANSMISSION LINE, FOWLES-NASA 138 KV Q-18 TRANSMISSION LINE RELOCATION PROJECT

OPSB CASE NO.: 25-0864-EL-BNR

September 24, 2025

American Transmission Systems, Incorporated
341 White Pond Dr.
Akron, Ohio 44320

IN THE OHIO POWER SITING BOARD
CASE NO. 25-0864-EL-BNR

CONSTRUCTION NOTICE
FOWLES-FOX 138 KV Q-12 TRANSMISSION LINE, FOWLES-FOX 138 KV Q-13 TRANSMISSION LINE, FOWLES-NASA 138 KV Q-17 TRANSMISSION LINE, FOWLES-NASA 138 KV Q-18 TRANSMISSION LINE RELOCATION PROJECT

The following information is being provided in accordance with Chapter 4906-6 of the Ohio Administrative Code ("Adm.Code") for the application and review of Accelerated Certificate Applications. Based upon the requirements found in Appendix A to Adm.Code 4906-1-01, this Project qualifies for submittal to the Ohio Power Siting Board ("Board") as a Construction Notice. Pursuant to Adm.Code 4906-6-04, 21-day expedited review is requested.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name and Reference Number

Name of Project:	Fowles-Fox 138 kV Q-12 Transmission Line, Fowles-Fox 138 kV Q-13 Transmission Line, Fowles-Nasa 138 kV Q-17 Transmission Line, Fowles-Nasa 138 kV Q-18 Transmission Line Relocation Project
Reference Number:	4044 – 4053 – 4075 - 4077

4906-6-05(B)(1): Brief Description of the Project

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, proposes to relocate an approximately 0.67-mile-long section of the Fowles-Fox 138 kV Q-12 Transmission Line, the Fowles-Fox 138 kV Q-13 Transmission Line, the Fowles-Nasa 138 kV Q-17 Transmission Line, and the Fowles-Nasa 138 kV Q-18 Transmission Line, which are located in a common corridor. To accommodate the relocation of the four transmission lines, the following work will be performed:

- On the Fowles-Nasa Q-18 and Fowles-Nasa Q-17 138 kV Transmission Lines
    - Five (5) existing double circuit steel lattice structures will be removed

- Seventeen (17) new ductile iron structures will be installed.
- Approximately 3,500 feet of new 795 kcmil 26/7 ‘Drake” conductor and single 7#8 Alumoweld shield wire will installed on each transmission line.

- On the Fowles-Fox Q12 and the Fowles-Fox Q13 138 kV Transmission Lines
  - Six (6) existing double circuit steel lattice structures will be removed.
  - Seventeen (17) new ductile iron structures will be installed.
  - Approximately 3,400 feet of new 336.4 kcmil 26/7 ‘Linnet” conductor and single 7#8 Alumoweld shield wire will be installed on each transmission line.

The general location of the Project is shown in **Exhibit 1**, a partial copy of the United States Geologic Survey, Cuyahoga County OH, Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery of the Project area. The general layout of the Project is attached as **Exhibit 3.** The Project is located in the city of Brook Park, Cuyahoga County, Ohio.

4906-6-05(B)(1): Construction Notice Requirement

The Project meets the requirements for a Construction Notice application because the Project is within the types of projects defined by Item (1)(d)(i) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm.Code 4906-1-01. This item states:

> *(1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*
>
> > *(d) Line(s) primarily needed to attract or meet the requirements of a specific customer or customers, as follows:*

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

The proposed Project is within the requirements of Item (1)(d)(i) as it involves the relocation of single or multiple circuit electric power transmission lines that is primarily needed to meet the requirements of a specific customer, and the lines are located solely on property owned by Primacy Development, LLC (the "Customer") that is requesting the relocation.

4906-6-05(B)(2): Need For the Project

The Project is needed to support a request made to ATSI by the Customer to relocate approximately .67 miles of the Fowles-Fox 138 kV Q-12 Transmission Line, the Fowles-Fox 138 kV Q-13 Transmission Line, the Fowles-Nasa 138 kV Q-17 Transmission Line and the Fowles-Nasa 138 kV Q-18 Transmission Line near the existing Ford Brookpark Substation to accommodate development of the site currently occupied by the existing transmission lines.

4906-6-05(B)(3): Location of the Project Relative to Existing or Proposed Lines

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2025 Long-Term Forecast Report. This map was submitted to the Public Utility Commission of Ohio ("PUCO") in Case No. 25-0504-EL-FOR under Adm.Code 4901:5-5:04(C)(2)(b). This Project was not included in the 2025 Long Term Forecast Report as it was not yet identified at the time of filing.

This Project was not vetted through the PJM RTEP process as it does not entail any topology or rating change.

4906-6-05(B)(4): Alternatives Considered

No alternatives were considered for this Project due to the specific needs and schedule constraints of the Customer.

4906-6-05(B)(5): Public Information Program

ATSI's manager of External Affairs will advise local officials of features and the status of the proposed Project as necessary. ATSI will maintain a copy of this Construction Notice, along with other Project information, on FirstEnergy's website: https://www.firstenergycorp.com/about/transmission_projects/ohio.html.

During all phases of this Project, the public may ask questions, submit comments or contact ATSI through the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com.

4906-6-05(B)(6): Construction Schedule

Construction on this Project is expected to begin as early as October 30, 2025, and be completed by January 23, 2026, at which time the Project will be placed in service.

4906-6-05(B)(7): Area Map

Exhibit 1 provides a partial copy of the USGS Topographic Map, Cuyahoga County, Ohio, Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery.

4906-6-05(B)(8): Property List

The project is located within existing and new right-of-way ("ROW"). As stated above, the only property involved is owned by the Customer, parcel 34218005.

4906-6-05(B)(9): TECHNICAL FEATURES OF THE PROJECT

4906-6-05(B)(9)(a): Operating Characteristics

The transmission line construction will have the following characteristics:

Voltage:	138 kV
ROW Width:	150 ft
Conductors:	795 kcmil 26/7 ACSR, 336.4 ACSR 26/7
Static Wire:	7#8 Alumoweld
Insulators:	Porcelain
Structure Type:	**Exhibit 4**: 138 kV Post Structure (6 Structures)
	Exhibit 5: 138 kV Strain Structure (26 structures)
	Exhibit 6: 138 kV 2-Pole Strain Structure (2 structures)

4906-6-05(B)(9)(b): Electric and Magnetic Fields

There are no occupied residences or institutions within 100 feet from the proposed transmission line. Therefore, no Electric and Magnetic Field calculations are required by this subsection.

4906-6-05(B)(9)(c): Estimated Cost

The estimated cost for the proposed Project is $11,150,000. Although not statutorily required for approval, at the request of OPSB Staff, ATSI confirms that ATSI's costs will be fully reimbursed by the Customer.

4906-6-05(B)(10): SOCIAL AND ECOLOGICAL IMPACTS

4906-6-05(B)(10)(a): Land Uses

The Project is located in the city of Brook Park, Cuyahoga County, Ohio. The land use within the vicinity of the proposed Project is industrial. This Project will take place in a new ROW located solely on the Customers' property.

4906-6-05(B)(10)(b): Agricultural Land

There are no parcels within the Project Area designated as an Agricultural District property, therefore no impact to any agricultural land will occur due to the Project.

4906-6-05(B)(10)(c): Archaeological or Cultural Resources

As part of the investigation for this Construction Notice, TRC Companies, Inc. ("TRC") requested database information from the Ohio Historic Preservation Office's ("SHPO") on July 11 and August 20, 2025, to identify the presence of previously recorded significant historic properties, including above-ground historic resources and/or archeological sites, mapped within one (1)-mile of the Project Study Area (Area of Potential Effect or APE). On August 26, 2025, SHPO replied to the request attached as Exhibit 7.

The SHPO database includes a catalog of all historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. There are two (2) above-ground historic resources that have been recommended eligible for listing by the OHPO within one (1)-mile of the proposed Project. These include a 1961-1975 bridge (OHPO ID 2018MLT41177), located 0.11 mile to the southwest and the Armory & Facility Maintenance Shop Repairs (OHPO ID: 2019CUY46534), located 0.5 mile to the south. In addition, there are 46 above-ground historic resources that have not yet been formally evaluated for NRHP eligibility recorded within one (1)-mile of the proposed Project. The nearest of these resources is situated 0.06-mile to the east.

The OHPO database also includes listings on the Ohio Historic Inventory (OHI), the Ohio Archaeological Inventory (OAI), previous cultural resource surveys, and the Ohio Genealogical Society (OGS) cemetery inventory. No NRHP-listed or Ohio Genealogical Society (OGS) cemeteries were recorded within one (1) mile.

Four (4) archaeological surveys have been conducted within one (1)-mile of the proposed Project. The nearest of these is located 0.73-mile to the east. No archaeological sites have been recorded within one (1) mile of the Project.

The Project Study Area consists of an existing, maintained utility right-of-way (ROW), railroad ROW, roadway ROW, and former to current industrial land use areas. Currently,

as proposed, no tree clearing is anticipated within or outside the Project Study Area. The proposed Project is not expected to have any adverse effects on known historic properties.

SHPO's findings state that there will be no effect on historic resources as a result of the Project. No cultural resource studies are warranted for the Project. No further coordination is required for this project unless the scope of work changes or archaeological remains are discovered during the course of the Project.

4906-6-05(B)(10)(d): Construction Filings with Local, State and Federal Governmental Agencies

Coordination with the Ohio Department of Transportation (ODOT) will be completed to obtain ROW permits necessary for work along and across SR-291 and I-71, based on the proposed Project. If more than one (1) acre of earth disturbance is proposed in the Project scope, then submittal of a Notice of Intent (NOI) application to the Ohio EPA will be required for coverage under the general construction stormwater permit (OHC000006), and a Storm Water Pollution Prevention Plan (SWPPP) will be submitted to the City of Brook Park Engineer. The Project Study Area crosses a CSX railroad and will require coordination with the railroad company if access is deemed necessary. All permitting and/or coordination necessary to comply with local, state, and federal agencies with jurisdiction regarding this Project will be completed prior to the commencement of construction. A list of government agency requirements can be seen in Table 1.

Table 1. List of Government Agency Requirements

Agency	Requirement
Ohio EPA	General NPDES Construction Storm Water Permit OHC000006
City of Brook Park Engineer	SWPPP Review
ODOT	ROW Permit(s)

Agency	Requirement
FAA	Determination of No Hazard[1]

4906-6-05(B)(10)(e): Endangered, Threatened, Rare and Designated Species Investigation

As part of the investigation, ATSI retained TRC to conduct the necessary surveys. TRC submitted a request to the Ohio Department of Natural Resources ("ODNR") Office of Real Estate to conduct an Environmental Review. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife's ("DOW") Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. The ODNR's Office of Real Estate's response on August 8, 2025, indicated that there are no records of state and/or federally listed plants or animals located within a one (1) mile radius of the Project Study Area. In addition, the Project is within the range of ten (10) state and/or federally listed animal species. A list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in Table 2. A copy of ODNR's Office of Real Estate's response is included as Exhibit 8.

Table 2. List of Endangered and Threatened Species within range of Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Mammals				
Indiana Bat	*Myotis sodalis*	Endangered	Endangered	Trees, forests, caves, and caverns.
Little Brown Bat	*Myotis lucifugus*	N/A	Endangered	Trees, forests, caves, and caverns.
Northern Long-eared Bat	*Myotis septentrionalis*	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored Bat	*Perimyotis subflavus*	Proposed Endangered	Endangered	Trees, forests, caves, and caverns.

[1] FAA is currently reviewing 21 submittals for this project. FAA has determined No Hazard for 13 structures.

Fish				
Bigmouth shiner	*Notropis dorsalis*	N/A	Threatened	Perennial streams.
Channel darter	*Percina copelandi*	N/A	Threatened	Perennial streams.
Lake sturgeon	*Acipenser fulvescens*	Species of Concern	Endangered	Large bodies of water with connections to much smaller streams for spawning.
Reptiles				
Blanding's turtle	*Emydoidea blandingii*	N/A	Threatened	Marshes, ponds, lakes, streams, wet meadows, and swampy forests.
Smooth greensnake	*Opheodrys vernalis*	N/A	Endangered	Prairies, marshy meadows, and roadside ditches.
Spotted turtle	*Clemmys guttata*	N/A	Threatened	Fens, bogs and marshes, wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches.

Based on the information received from correspondence with ODNR, the Project is within the vicinity of records for the Indiana bat and the tricolored bat. Since the presence of state endangered bat species has been established in the area, summer tree clearing is not recommended by ODNR. The Project is also within the ranges of the Indiana bat, the northern long-eared bat, the little brown bat, and the tricolored bat. These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, and cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost tress. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed for ATSI and submitted to ODNR for concurrence on August 21, 2025. ODNR responded on August 27, 2025, attached as Exhibit 9 concurring that no caves, cliffs, or mine openings occur in the Project Study Area; therefore, the

Project is not likely to impact hibernating bats. In assessing compliance with NWP General Condition 18, TRC determined that tree clearing is not anticipated within the Project Study Area; therefore, no impacts to bat species are anticipated as a result of this Project.

The Project is within the range of the lake sturgeon (*Acipenser fulvescens*), a state endangered fish and a federal species of concern; the channel darter (*Percina copelandi*), a state threatened fish; and the bigmouth shiner (*Notropis dorsalis*), 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. Since no in-water work is proposed in a perennial stream, this Project will not impact these or other aquatic species.

The Project is within the range of the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant but can also be found in marshy meadows and roadside ditches. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project will not impact this species.

The Project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project will not impact this species.

The Project is also within the range of the Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as it moves from one wetland to the next. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project will not impact this species.

As part of the investigation, TRC submitted a request to the US Fish and Wildlife Service ("USFWS") for an Ecological Review to research the presence of any endangered, threatened, rare, or designated species within one (1) mile of the Project Area. A copy of USFWS's Ecological Review response, dated July 18, 2025, is included as Exhibit 10**.** Due

to the Project type, size, and location, USFWS stated they do not anticipate adverse effects to any federally endangered, threatened, or proposed species or proposed or designated critical habitat.

4906-6-05(B)(10)(f): Areas of Ecological Concern

TRC performed field investigations to identify and delineate wetlands and waterbodies located within the 22.91 acres Project Study Area on April 15, 2025, and July 25, 2025. Two (2) palustrine emergent wetlands (W-EVN-1 and W-EVN-2) were identified and delineated within the Project Study Area. Due to the location of the structures and proposed construction activities, there are no anticipated impacts to these wetland areas. A Technical Memorandum for the Surface Water Delineation of the Project Study Area is included in Exhibit 11.

The Project Study Area consists of an existing, maintained utility and road right-of-way with existing industrial land use, which includes a minor amount of developed open space. TRC did not observe the presence of any of the ODNR or federally listed species during the field investigation due to the highly maintained nature of the utility ROW and surrounding industrial and developed land use. Therefore, no impacts are anticipated to any of the listed species detailed in the ODNR correspondence.

A review of the USGS Protected Areas Database (www.usgs.gov/programs/gap-analysis-project/science/protected-areas) revealed no conservation easements within the Project Study Area. The National Conservation Easement Database is no longer in use due to the database no longer being actively updated and supported.

4906-6-05(B)(10)(g): Other Information

Construction and operation of the proposed Project will be in accordance with the requirements specified in the latest revision of the National Electrical Safety Code as adopted by the PUCO and will meet all applicable safety standards established by the Occupational Safety and Health Administration.

No other or unusual conditions are expected that will result in significant environmental, social, health or safety impacts.

4906-6-07: Documentation of Construction Notice Transmittal and Availability for Public Review

This Construction Notice application is being provided concurrently with its docketing with the Board to the following officials in the City of Brook Park, Cuyahoga County, Ohio. A copy will also be provided to the Cuyahoga County Public Library Brook Park Branch for public review/reference.

Cuyahoga County

Chris Ronayne
Cuyahoga County Executive
cronayne@cuyahogacounty.gov
2079 East 9th Street, 8th floor
Cleveland, OH 44115

David Ray
Cuyahoga County Engineer
publicworks@cuyahogacounty.gov
2079 East Ninth St.
Cleveland, OH 44115

Dale Miller
Cuyahoga County Council District 2
dmiller@cuyahogacounty.gov
2079 East 9th Street, 8th floor
Cleveland, OH 44115

Cuyahoga SWCD
info@cuyahogaswcd.org
3311 Perkins Ave #100,
Cleveland, OH 44114

Michael Chambers
Cuyahoga County Fiscal Officer
mchambers@cuyahogacounty.gov
226 Middle Avenue, 4th Floor
Elyria, Ohio 44035

Brook Park

Edward Orcutt
Brook Park Mayor
mayor@cityofbrookpark.com
6161 Engle Rd.
Brook Park, OH 44142

Richard Salvatore
Brook Park Council President
brookparksalvatore@gmail.com
6161 Engle Rd.
Brook Park, OH 44142

Jim Mencini
Brook Park Ward 2 Councilman
jamesmencini@yahoo.com
6161 Engle Rd.
Brook Park, OH 44142

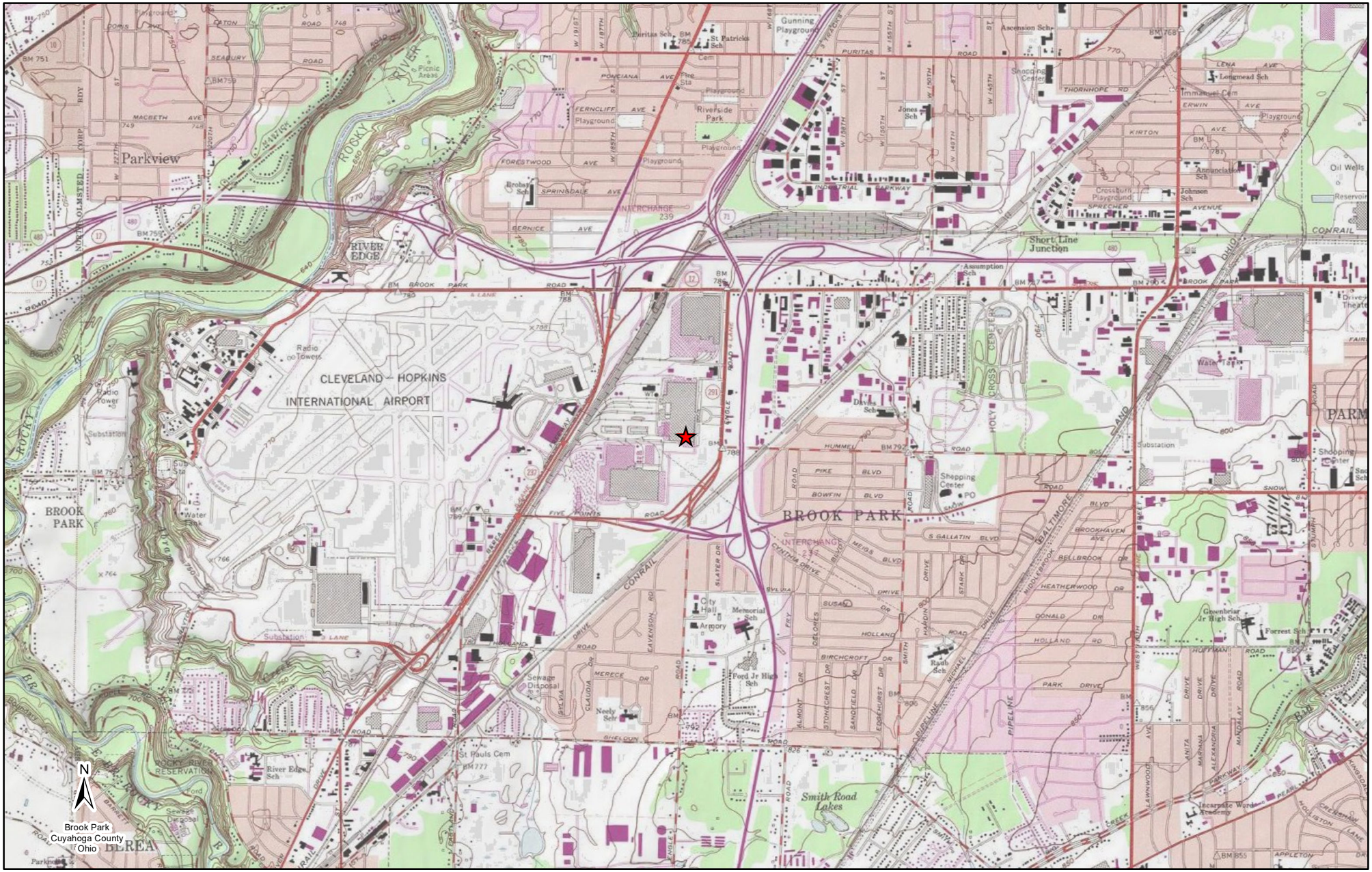
Robert McGann
Brook Park Finance Director
bmcgann@cityofbrookpark.com
6161 Engle Rd.
Brook Park, OH 44142

Library

Gabriel Venditti, Branch Manager
Cuyahoga County Public Library, Brook Park Branch
6155 Engle Road
Brook Park, OH 44142
gvenditti@cuyahogalibrary.org

Copies of the transmittal letters to these officials have been included with this application as proof of compliance under Adm.Code 4906-6-07(B) to provide the Board with proof of notice to local officials as required by Adm.Code 4906-6-07(A)(1) and to the library per Adm.Code 4906-6-07(A)(2).

Information is posted at www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Construction Notice application. The link to this website is being provided to meet the requirements of Adm.Code 4906-6-07(B) and to provide the Board with proof of compliance with the notice requirements in Adm.Code 4906-6-07(A)(3).



LEGEND:

★ Project Area

0 1,600 3,200 6,400

Feet

Reference:
USGS Topographical Overlay

Coordinate System:
NAD_1983_StatePlane_Ohio_North_FIPS_3401_Feet
WKID: 3734 Authority: EPSG

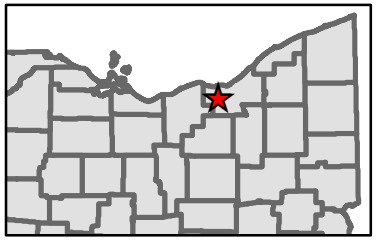


EXHIBIT 1

ATSI®
American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

**Fowles-Fox 138 kV Q-12 Transmission Line,
Fowles-Fox 138 kV Q-13Transmission Line,
Fowles-Nasa 138 kV Q-17 Transmission Line,
Fowles-Nasa 138 kV Q-18 Transmission Line
Relocation Project**

LEGEND:

★ Project Area

0 1,600 3,200 6,400

Feet

Reference:
USGS Topographical Overlay

Coordinate System:
NAD_1983_StatePlane_Ohio_North_FIPS_3401_Feet
WKID: 3734 Authority: EPSG

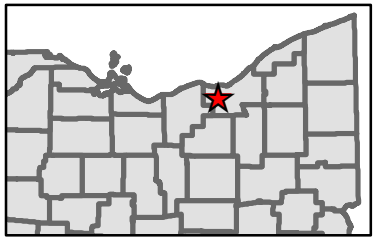


EXHIBIT 2

ATSI®
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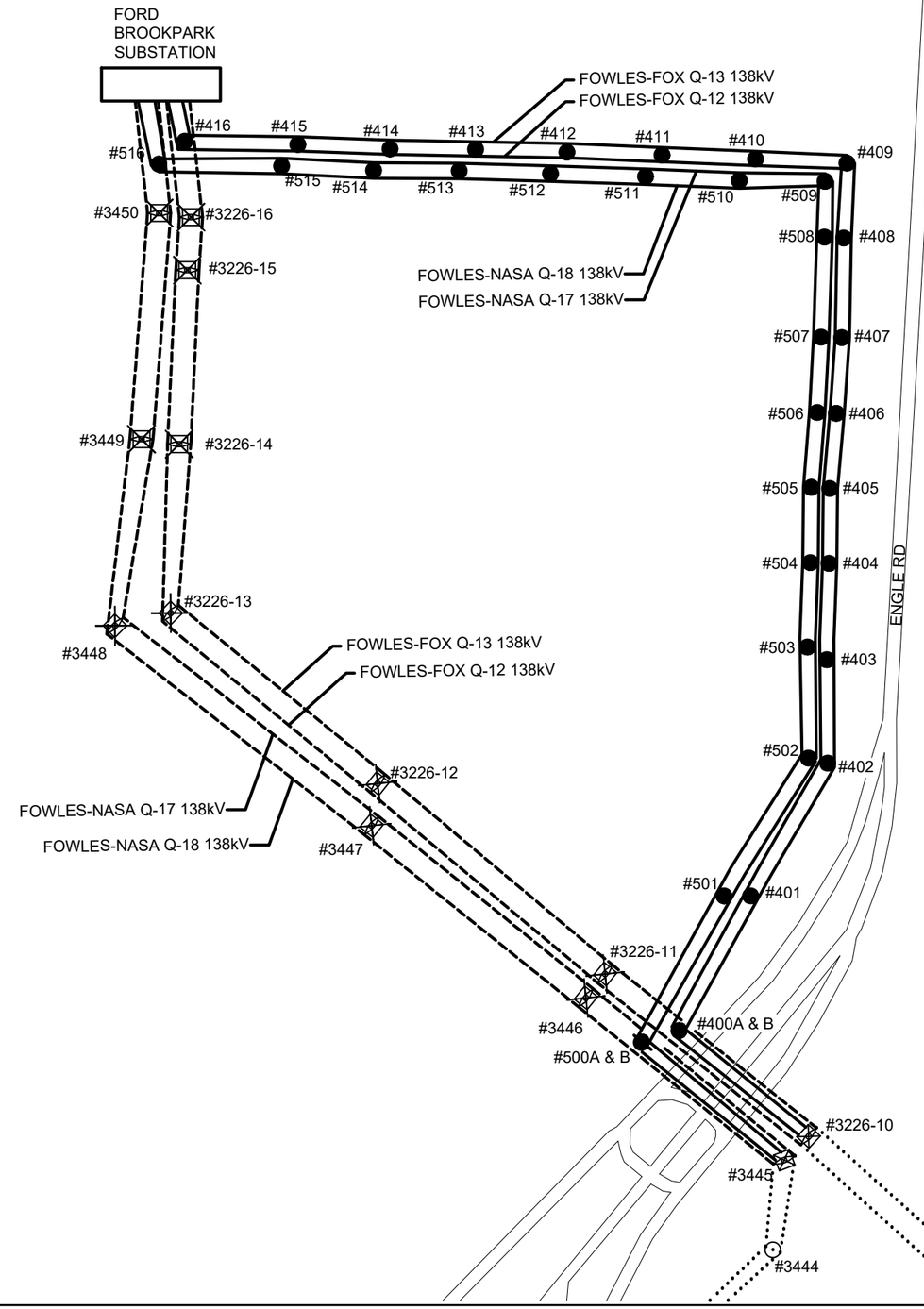
**Fowles-Fox 138 kV Q-12 Transmission Line,
Fowles-Fox 138 kV Q-13Transmission Line,
Fowles-Nasa 138 kV Q-17 Transmission Line,
Fowles-Nasa 138 kV Q-18 Transmission Line
Relocation Project**



CITY OF BROOK PARK
CUYAHOGA COUNTY
STATE OF OHIO

LEGEND

- EXISTING TRANSMISSION LINE
- PROPOSED TRANSMISSION LINE
- EXISTING TRANSMISSION LINE TO BE REMOVED
- RAILROAD TRACK
- NEW STRUCTURE
- EXISTING STRUCTURE
- EXISTING STRUCTURE TO BE REMOVED
- EXISTING STRUCTURE TO BE REMOVED
- SUBSTATION

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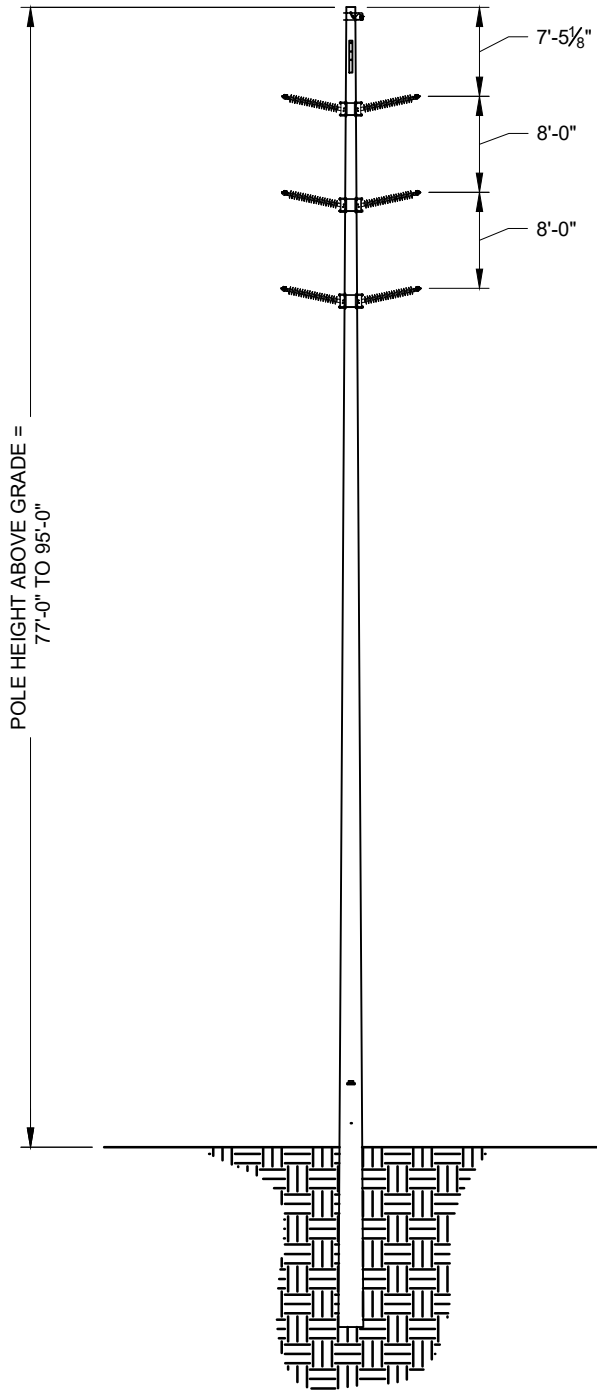
Fowles-Nasa 138 kV Q-18 Transmission Line
Relocation Project

General Layout

Exhibit 3



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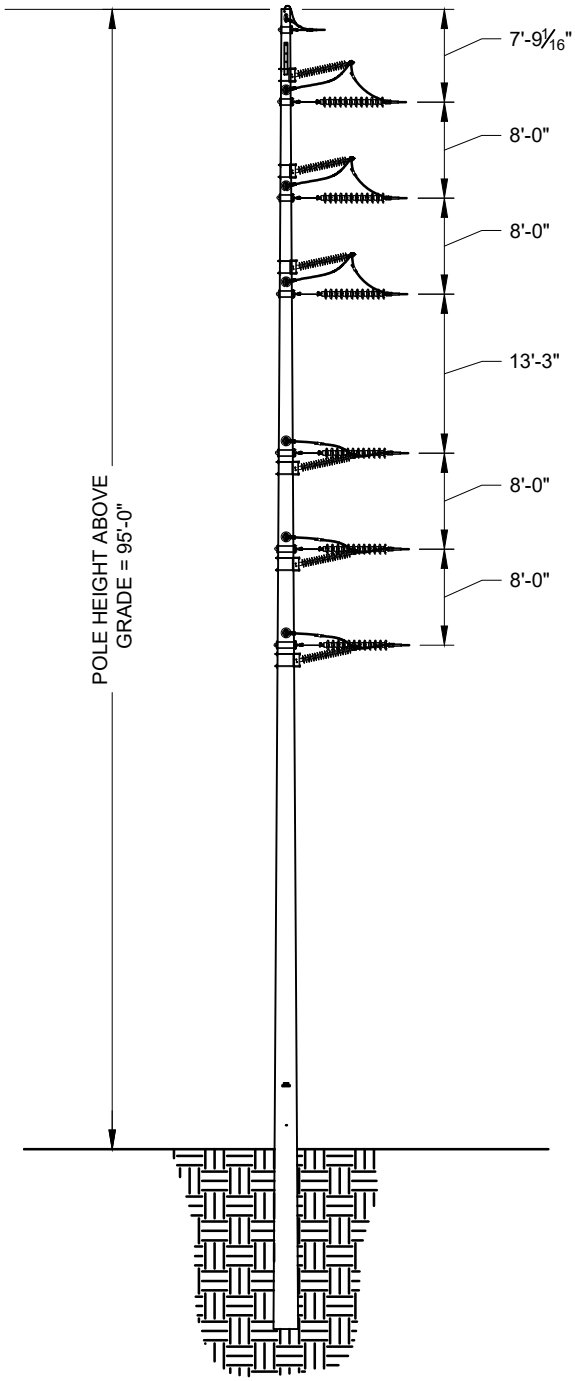
Fowles-Nasa 138 kV Q-17 Transmission Line,
Fowles-Nasa 138 kV Q-18 Transmission Line
Relocation Project

Typical Post Structure

Exhibit 4

1



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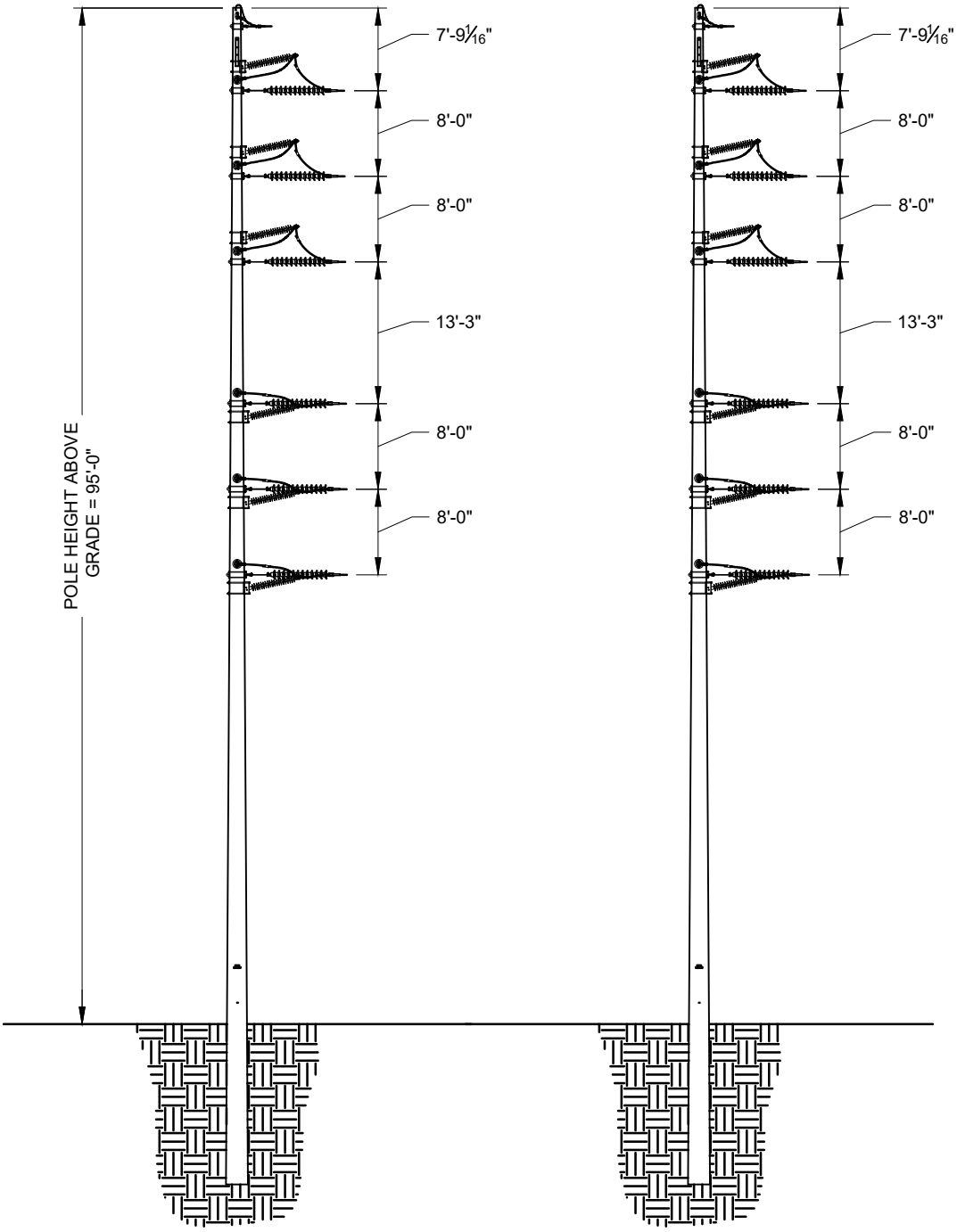
Relocation Project

Typical Strain Structure

Exhibit 5



TYPICAL STRUCTURE ARRANGEMENT FOR #400A&B AND #500A&B

ATSI®
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Fowles-Fox 138 kV Q-12 Transmission Line,
Fowles-Fox 138 kV Q-13Transmission Line,
Fowles-Nasa 138 kV Q-17 Transmission Line,
Fowles-Nasa 138 kV Q-18 Transmission Line
Relocation Project

2-Pole Strain Structure

Exhibit 6

OHIO HISTORY CONNECTION

In reply, refer to
2025-CUY-65700

August 26, 2025

Justin D. McKissick
TRC Environmental Corporation
317 E. Carson St., Ste. 113
Pittsburgh, PA 15219
jmckissick@trccompanies.com

RE: Brook Park Ford Plant Project, City of Brook Park, Cuyahoga County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on July 11, and August 20, 2025, regarding the proposed Brook Park Ford Plant Project located in the City of Brook Park, Cuyahoga 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]).

Per the submission, the project involves the removal and relocation of FirstEnergy's Fowles-Nasa 138kV line in the City of Brook Park, Cuyahoga County, Ohio. Additional information provided on August 20, 2025, indicated that the transmission line will be temporarily relocated using wooden poles, but will be buried underground in the future. A review of SHPO's records identified two (2) National Register of Historic Places (NRHP)-eligible above-ground resources and forty-six (46) Ohio Historic Inventory (OHI) resources within one (1)-mile of the project. Because the transmission line will be installed belowground, our office finds that the proposed work should not impact the significance or integrity of the above-ground resources in a way that would alter their potential National Register eligibility The project has not been previously professionally surveyed for archaeological resources; however, it has been extensively disturbed through previous industrial and commercial development. It is unlikely that intact archaeological sites will be impacted by the project. No 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: 1110500

EXHIBIT 8

Department of Natural Resources
ohiodnr.gov

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

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

August 8, 2025

Erin Van Nort
TRC Companies, Inc.
1382 West 9th Street, Suite 400
Cleveland, Ohio 44113

Re: 25-1060_Brook Park Ford Plant

Project: The proposed project involves the removal and relocation of structures on FirstEnergy's Fowles-Nasa 138kV transmission line.

Location: The proposed project is located in Brook Park, Cuyahoga 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 Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree clearing is not recommended, and additional summer surveys would not constitute presence/absence in

the area. However, limited summer tree clearing inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

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

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

The project is within the range of the lake sturgeon (*Acipenser fulvescens*), a state endangered fish and a federal species of concern, the channel darter (*Percina copelandi*), a state threatened fish, and the bigmouth shiner (*Notropis dorsalis*), 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 these or other aquatic species.

The project is within the range of the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant but can also be found in marshy meadows and roadside ditches. 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 spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. 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 Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as it moves from one wetland to

the next. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

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

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

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

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

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

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

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

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

Exhibit 9

From: Eileen.Wyza@dnr.ohio.gov
To: Slabe, Jenna
Cc: Falkinburg, Brad; Molnar, Maggie
Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy"s Brook Park Ford Plant Project
Date: Wednesday, August 27, 2025 2:50:05 PM
Attachments: image002.png
image004.png
image005.png
image006.png
image007.png
image008.png
image001.png

Hello Jenna,

Per review of the desktop survey provided for FirstEnergy's Brook Park Ford Plant Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Therefore, the project is not likely to impact hibernating bats.

Should any reported conditions change before or during construction, please contact me for additional guidance.

Thank you,

Eileen Wyza, Ph.D.
(she/her/hers)
Wildlife Biologist
Ohio Division of Wildlife
Phone: 614-265-6764
Email: Eileen.Wyza@dnr.ohio.gov

From: Slabe, Jenna <JSlabe@trccompanies.com>
Sent: Thursday, August 21, 2025 9:49 AM
To: Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>
Cc: Falkinburg, Brad <BFalkinburg@trccompanies.com>; Molnar, Maggie <MMolnar@trccompanies.com>
Subject: Desktop Hibernacula Assessment: FirstEnergy's Brook Park Ford Plant Project

Eileen,

In response to ODNR's DOW recommendations (attached), TRC completed a desktop hibernacula assessment to determine if potential hibernaculum is present within FirstEnergy's proposed Brook Park Ford Plant Project located in the city of Brook Park, in Cuyahoga County, Ohio.

Please let us know if you have any questions on the provided desktop assessment or require any additional information, thank you!

Jenna Slabe, PWS

Ecologist

1382 W 9th St, Suite 400, Cleveland, OH 44113
C 330.998.0481 | JSlabe@trccompanies.com
TRCcompanies.com

EXHIBIT 10

United States Department of the Interior

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

July 18, 2025

Project Code: 2025-0120178

Dear Ms. Van Nort:

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

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

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

Sincerely,

Erin Knoll
Field Office Supervisor

1382 West Ninth St.
Suite 400
Cleveland, OH 44113

T 216.344.3072
TRCcompanies.com

July 30, 2025

Mr. Auggie Ruggiero
FirstEnergy Corporation
341 White Pond Drive
Akron, OH 44320

Reference: Technical Memorandum for the Surface Water Delineation of the Brook Park Ford Plant Project located in the city of Brook Park, Cuyahoga County, Ohio
(TRC Project No. 664675 Phase 22)

Dear Mr. Ruggiero:

On behalf of FirstEnergy Corporation (FirstEnergy), TRC Environmental Corporation (TRC) conducted a surface water delineation for the Brook Park Ford Plant Project (Project). The Project is in the city of Brook Park, Cuyahoga County, Ohio and is 22.91 acres in size (**Attachment A**, Figures 1 and 2). The Project Study Area is located at the following approximate coordinates: 41.411565, -81.826335 (northwest terminus) and 41.405116, -81.820688 (southeast terminus). This Project involves the removal and relocation of structures on FirstEnergy's Fowles-Nasa 138kV transmission line.

The delineation was conducted by qualified wetland scientists on April 15, 2025, and July 25, 2025, in accordance with the United States Army Corps of Engineers (USACE) parameters. The objective was to evaluate and delineate potential surface water resources within the Project Study Area, such that the resources could be considered during each phase of the Project. Prior to the site visit, TRC reviewed available secondary source information such as the National Wetlands Inventory (NWI), National Hydrography Dataset (NHD), United States Geological Survey (USGS) topographic maps, County Soil Survey maps, and aerial imagery of the Project Study Area to use in addition to the field investigation.

The Project Study Area is shown on the attached map (**Attachment A,** Figure 1), which was derived from the USGS Lakewood, Ohio 7.5-minute quadrangle topographic map. Soils mapped within the Project Study Area are non-hydric soils (**Attachment A,** Figure 3). A review of the NWI and NHD maps indicates no features within the Project Study Area (**Attachment A,** Figure 4). According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panels 39035C0162E (eff. 12/3/2010) and 39035C0164E (eff. 12/3/2010), the Project Study Area is not located within a FEMA mapped 100-Year Flood Zone (**Attachment A,** Figure 4). During the field investigation, land use within the Project Study Area was observed to be an existing, maintained utility and road right-of-way within an existing industrial land use, which includes a minor amount of developed open space. The Project Study Area is surrounded by commercial and industrial land use. See attached mapping in **Attachment A** and the Photographic Record in **Attachment B** for further details of the Project Study Area.

During the field investigation, two (2) wetlands, W-EVN-1 and W-EVN-2, were identified within the Project Study Area. No other ecological resources were observed within the Project Study Area. Three (3) roadway, non-jurisdictional ditches (NJD-EVN-1, NJD-EVN-2, and NJD-EVN-3) were identified during the field investigation. The delineated wetland boundaries and the associated sample points as well as the non-jurisdictional ditches are shown on the attached **Figure 5** Delineated Resources Map located in **Attachment A**. The data was collected and recorded on the USACE Wetland Determination Data Sheets – Northcentral and Northeast Region which is provided in **Attachment C.** In addition, a wetland functional assessment was completed using the Ohio Environmental Protection Agency (OEPA) Ohio Rapid Assessment Method (ORAM) data forms for the delineated wetlands. The completed ORAM Forms can be found in **Attachment C**. See **Table 1** below for a summary of the resources observed.

Table 1. Wetlands

Wetland ID	Cowardin Classification	Connection[1]	ORAM Score and Category	Delineated Area within Project Study Area (acres)
W-EVN-1	PEM	Adjacent	13 (Cat. 1)	0.053
W-EVN-2	PEM	Adjacent	13 (Cat. 1)	0.038

Note: See Delineated Resources Map and Photographic Record for more details.
[1] Wetland connection is pending an update from OEPA and USACE based on the USA vs. Sackett case.

It is TRC's understanding that this Project would fall under Nationwide Permit (NWP) 57 - Electric Utility Line and Telecommunications Activities, for regulated activities within jurisdictional resources. Additionally, the Project is located within an "Eligible" area according to the OEPA's Stream Eligibility for the USACE NWP Program (**Attachment A**, Figure 6); however, OEPA's 401 Water Quality Certification for NWP 57 Electric Utility Line and Telecommunications Activities is currently waived. No additional screening procedures are required for the Project regarding compliance with OEPA's 401 Water Quality Certification.

This Technical Memorandum represents the conditions within the Project Study Area identified herein, as of the inspection date. Should you require any additional information or have any questions concerning this letter, please feel free to contact me at (440) 666-2890 or by email at BFalkinburg@TRCCompanies.com.

Kind Regards,

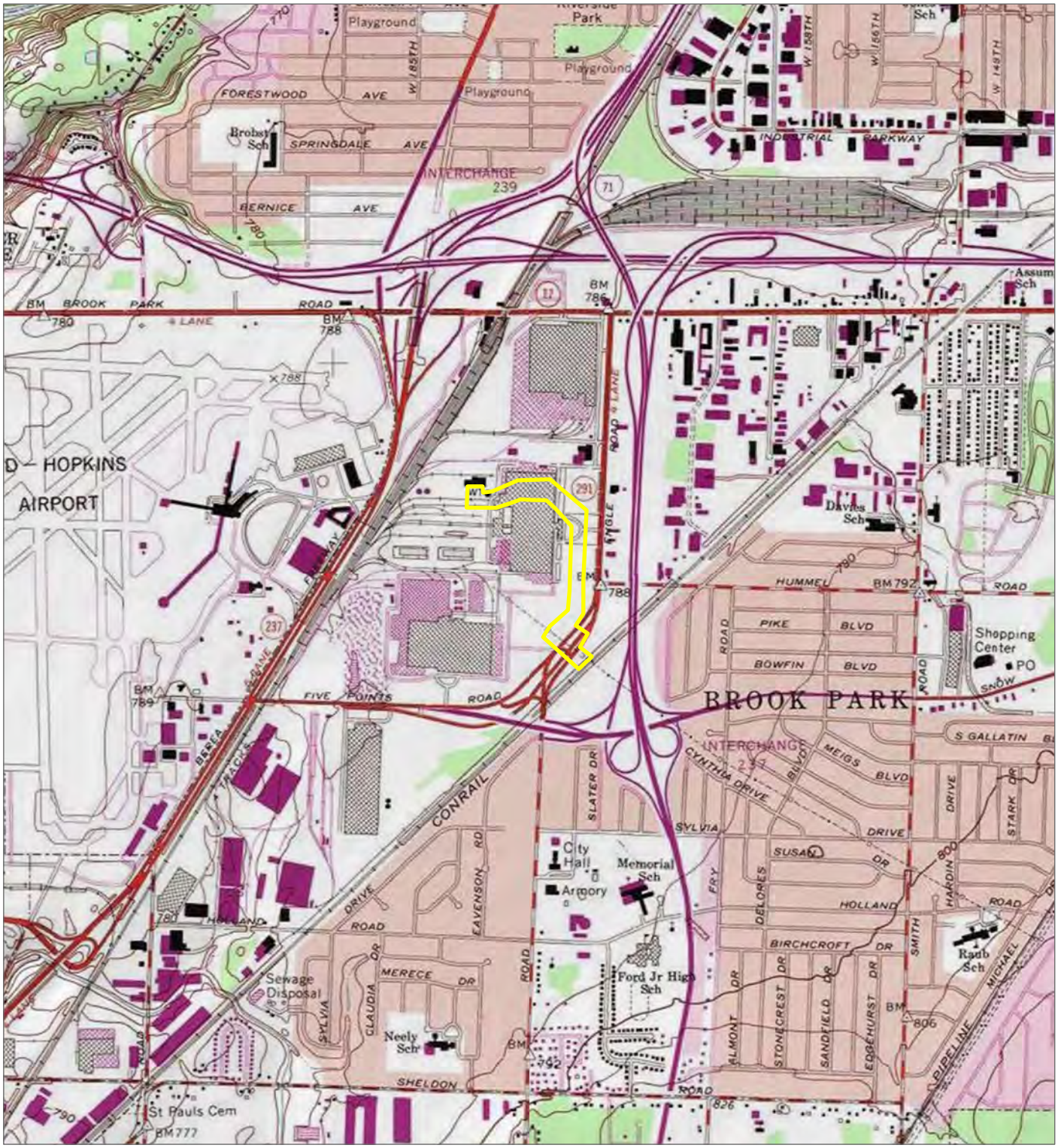
TRC Environmental Corporation

Brad M. Falkinburg, PWS
Ecological Office Practice Leader

cc: Maggie Molnar, PWS – TRC Environmental Corporation (mmolnar@trccompanies.com)

Attachments
Attachment A: Figures
Attachment B: Photographic Record
Attachment C: Data Sheets

ATTACHMENT A – Figures



PROJECT STUDY AREA

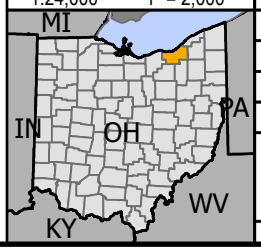
BASE MAP: USA TOPO MAPS MAP SERVICE, LAKEWOOD QUAD

N

0 1,000 2,000

FEET

1:24,000 1" = 2,000'



PROJECT:

FIRSTENERGY
BROOK PARK FORD PLANT
CUYAHOGA COUNTY, OH

TITLE:

SITE LOCATION MAP

DRAWN BY:	M. OPEL	PROJ. NO.:	664675 P22
CHECKED BY:	M. MOLNAR		
APPROVED BY:	B. FALKINBURG		**FIGURE 1**
DATE:	JULY 2025		

TRC

1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: WDR

COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH FIPS 3401 FEET; MAP ROTATION: 0
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BASE MAP: GOOGLE MAPS.

1:4,800
1" = 400'

0 400 800 FEET

PROJECT:	FIRSTENERGY BROOK PARK FORD PLANT CUYAHOGA COUNTY, OH
TITLE:	AERIAL MAP

DRAWN BY:	M. OPEL	PROJ. NO.:	664675 P22
CHECKED BY:	M. MOLNAR		FIGURE 2
APPROVED BY:	B. FALKINBURG		
DATE:	JULY 2025		

TRC
1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet. Map Rotation: 0
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PROJECT STUDY AREA
HYDRIC SOIL
NON-HYDRIC W/ HYDRIC INCLUSIONS SOIL
NON-HYDRIC SOIL

BASE MAP: GOOGLE MAPS.
DATA SOURCES: SOILS DATA ACQUIRED FROM USDA/NRCS SSURGO DATABASE.

N

1:6,000
1" = 500'

0 500 1,000 FEET

PROJECT:
FIRSTENERGY
BROOK PARK FORD PLANT
CUYAHOGA COUNTY, OH

TITLE:
SOILS MAP

DRAWN BY:	M. OPEL	PROJ. NO.:	664675 P22
CHECKED BY:	M. MOLNAR		**FIGURE 3**
APPROVED BY:	B. FALKINBURG		
DATE:	JULY 2025		

TRC
1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet Map Rotation: 0
Saved By: MOPEL on 7/18/2025, 3:56:47 PM Path: T:\1-PROJECTS\Ford_Energy\664675_022_BrookPark\Ford\2-APRX\WDR.aprx Layout Name: Fig03_Soils

PROJECT STUDY AREA
NATIONAL HYDROGRAPHY DATASET (NHD) STREAM
NATIONAL WETLANDS INVENTORY (NWI) FEATURE
100-YEAR FLOOD ZONE

BASE MAP: GOOGLE MAPS.
DATA SOURCES: WETLAND DATA ACQUIRED FROM U.S. FISH & WILDLIFE SERVICE, NATIONAL WETLANDS INVENTORY (NWI). STREAM DATA ACQUIRED FROM USGS, NATIONAL HYDROGRAPHY DATASET (NHD). FLOOD DATA ACQUIRED FROM FEMA, NATIONAL FLOOD HAZARD LAYER (NFHL).

1:6,000
1" = 500'

0 500 1,000 FEET

PROJECT:
FIRSTENERGY
BROOK PARK FORD PLANT
CUYAHOGA COUNTY, OH

TITLE:
NHD, NWI AND FEMA FLOODPLAIN MAP

DRAWN BY:	M. OPEL	PROJ. NO.:	664675 P22
CHECKED BY:	M. MOLNAR		
APPROVED BY:	B. FALKINBURG		**FIGURE 4**
DATE:	JULY 2025		

TRC
1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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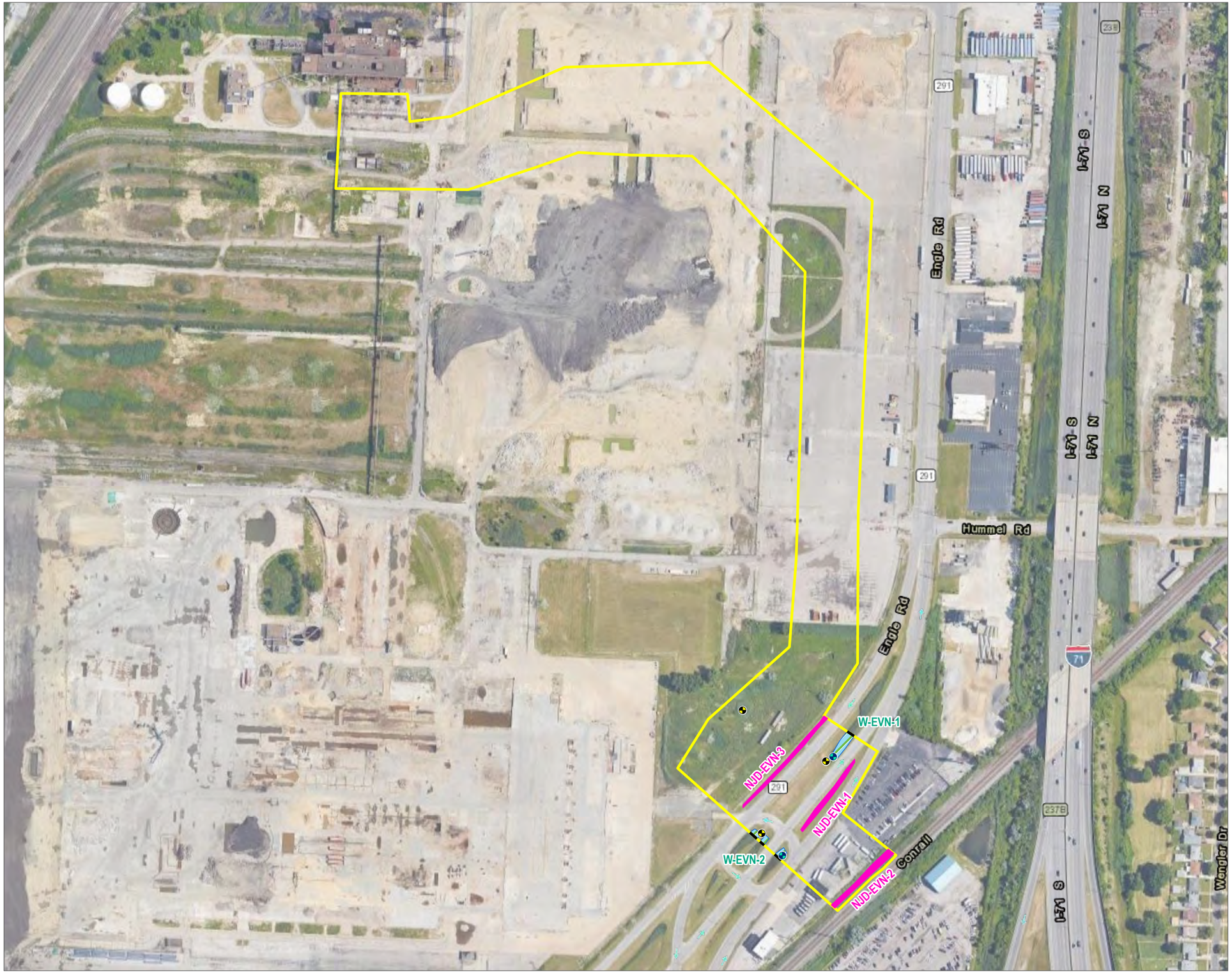

PROJECT STUDY AREA
NON-JURISDICTIONAL DITCH (0.262 ACRES)
PEM WETLAND (0.091 ACRES)
WETLAND CONTINUES
WETLAND DATA POINT
UPLAND DATA POINT

BASE MAP: GOOGLE MAPS.
DATA SOURCES: TRC WETLAND DELINEATION COMPLETED JULY 25, 2025.

1:3,600
1" = 300'
0 300 600 FEET

PROJECT: FIRSTENERGY
BROOK PARK FORD PLANT
CUYAHOGA COUNTY, OH

TITLE: DELINEATED RESOURCES MAP

DRAWN BY:	M. OPEL	PROJ. NO.:	664675 P22
CHECKED BY:	M. MOLNAR		FIGURE 5
APPROVED BY:	B. FALKINBURG		
DATE:	JULY 2025		

TRC
1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet. Map Rotation: 0
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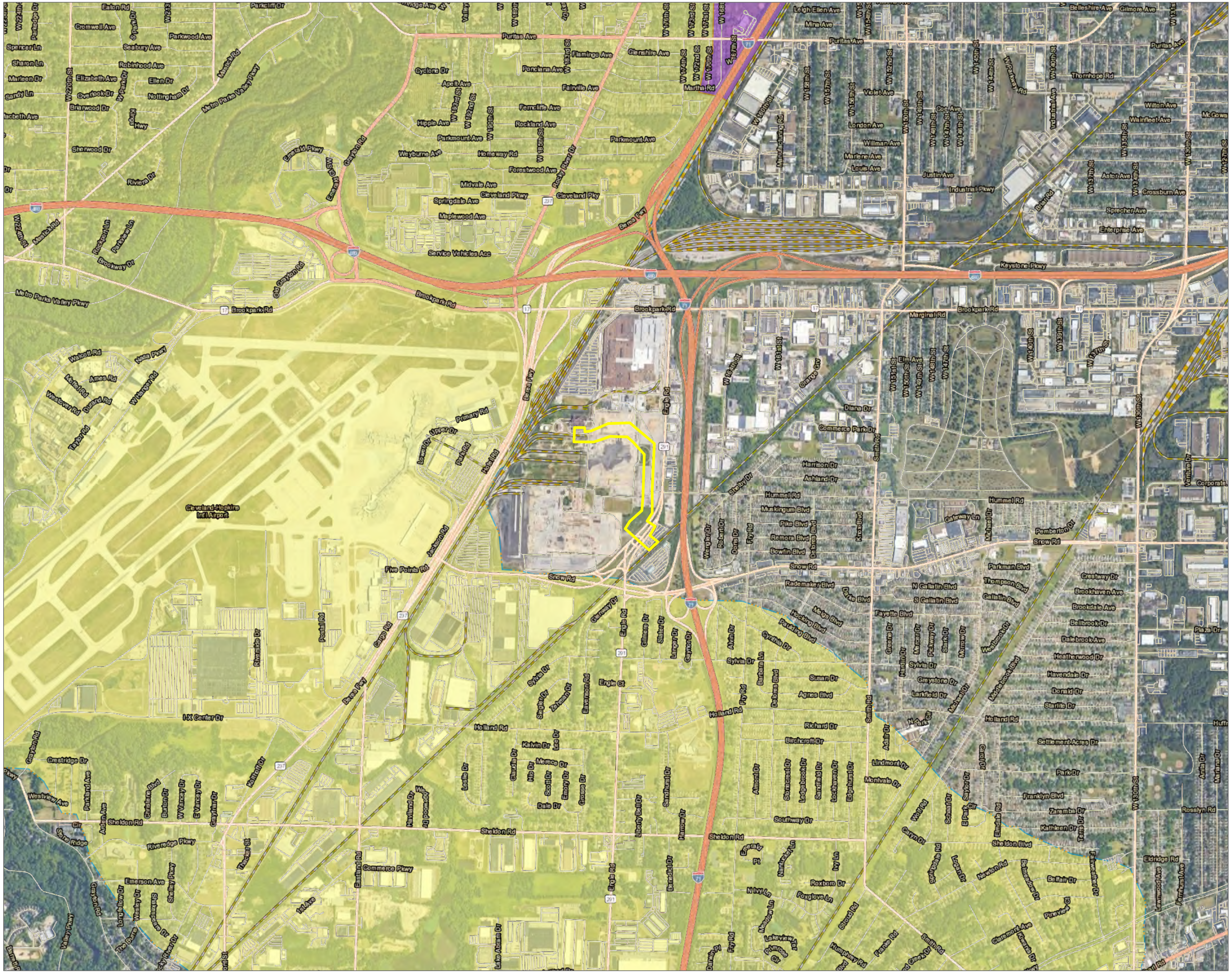


PROJECT STUDY AREA

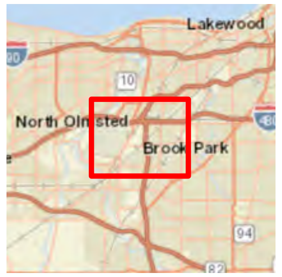
OHIO EPA 401 WATER QUALITY CERTIFICATION FOR NATIONWIDE PERMIT ELIGIBILITY

INELIGIBLE

POSSIBLY ELIGIBLE

ELIGIBLE

BASE MAP: GOOGLE MAPS.
DATA SOURCES: NATIONWIDE PERMITS STREAM DATA ACQUIRED FROM THE OHIO EPA.



N

1:24,000
1" = 2,000'

0 2,000 4,000 FEET

PROJECT:	FIRSTENERGY BROOK PARK FORD PLANT CUYAHOGA COUNTY, OH
TITLE:	NATIONWIDE PERMITS STREAM ELIGIBILITY MAP
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P22
CHECKED BY: M. MOLNAR	FIGURE 6
APPROVED BY: B. FALKINBURG	
DATE: JULY 2025	

TRC

1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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ATTACHMENT B – Photographic Record

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 1. **Date:** 04/15/2025 **Description:** Facing southeast, viewing the Project Study Area.	

Photo No. 2. **Date:** 04/15/2025 **Description:** Facing south, viewing the Project Study Area.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 3. **Date:** 04/15/2025 **Description:** Facing south, viewing the disturbed landscape within the Project Study Area.	

Photo No. 4. **Date:** 04/15/2025 **Description:** Facing northeast, viewing the Project Study Area.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 5. **Date:** 04/15/2025 **Description:** Facing west, viewing the Project Study Area.	

Photo No. 6 **Date:** 04/15/2025 **Description:** Facing west, viewing the Project Study Area.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 7 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-1, facing north.	

Photo No. 8 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-1, facing west.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 9 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-1, facing south.	

Photo No. 10 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-1, facing east.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 11 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-2, facing north.	

Photo No. 12 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-2, facing west.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 13 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-2, facing south.	

Photo No. 14 **Photo Date:** 7/25/2025 **Description:** Photo of Wetland W-EVN-2, facing east.	

PHOTOGRAPHIC RECORD
Brook Park Ford Plant Project

Client Name:	Site Location:	Project No.
FirstEnergy Corporation	City of Brook Park, Cuyahoga County, Ohio	664675 Phase 22

Photo No. 15	
Photo Date: 7/25/2025	
Description: Representative photo from the southern extent of the Project Study Area, view looking south.	

Photo No. 16	
Photo Date: 7/25/2025	
Description: View looking southwest within the existing roadway right-of-way and ditch located between the east and west bound lanes of Engle Road.	

ATTACHMENT C – Data Sheets

USACE Wetland Determination Data Sheets – Northcentral and Northeast Region

U.S. Army Corps of Engineers

WETLAND DETERMINATION DATA SHEET – Northcentral and Northeast Region

See ERDC/EL TR-12-1; the proponent agency is CECW-COR

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

Project/Site: Brook Park Ford Plant City/County: Brook Park, Cuyahoga County Sampling Date: 2025-4-15

Applicant/Owner: FirstEnergy State: OH Sampling Point: ROP-BMF-01

Investigator(s): Brad Falkinburg Section, Township, Range: NA

Landform (hillslope, terrace, etc): Flat Local relief (concave, convex, none): None Slope (%): 0 to 1

Subregion (LRR or MLRA): MLRA 139 of LRR R Lat: 41.406542 Long: -81.822221 Datum: WGS84

Soil Map Unit Name: Urban land NWI Classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✘ No ____ (If no, explain in Remarks.)

Are Vegetation ____ , Soil ____ , or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✘ No ____

Are Vegetation ____ , Soil ____ , or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes ✘ No ____

Hydric Soil Present? Yes ____ No ✘

Wetland Hydrology Present? Yes ✘ No ____

Is the Sampled Area within a Wetland? **Yes** ____ **No** ✘

If yes, optional Wetland Site ID: ROP-BMF-02

Remarks: (Explain alternative procedures here or in a separate report.)

Covertype is PEM. Based on the absence of the hydric soil parameter, this area is an upland.

HYDROLOGY

Wetland Hydrology Indicators:

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

- ✘ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✘ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes ✘ No ____ Depth (inches): 1

Water Table Present? Yes ____ No ✘ Depth (inches): ____

Saturation Present? (includes capillary fringe) Yes ____ No ✘ Depth (inches): ____

Wetland Hydrology Present? Yes ✘ **No** ____

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

Remarks:

The criterion for wetland hydrology is met.

VEGETATION ─ Use scientific names of plants. Sampling Point: ROP-BMF-01

Tree Stratum (Plot size: 30 ft radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Sapling/Shrub Stratum (Plot size: 15 ft radius)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Herb Stratum (Plot size: 5 ft radius)			
1. *Phragmites australis*	70	Yes	FACW
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	70	= Total Cover	

Woody Vine Stratum (Plot size: 30 ft radius)			
1.			
2.			
3.			
4.			
	0	= Total Cover	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	70	x 2 =	140
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	70 (A)		140 (B)

Prevalence Index = B/A = 2

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.

Definitions of Vegetation Strata:

Tree ─ Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub ─ Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb ─ All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines ─ All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** ✘ **No** __

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

The criterion for hydrophytic vegetation is not met.

SOIL Sampling Point: ROP-BMF-01

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

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 to 10	10YR 5/3	100					Clay Loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- __ Histosol (A1)
- __ Histic Epipedon (A2)
- __ Black Histic (A3)
- __ Hydrogen Sulfide (A4)
- __ Stratified Layers (A5)
- __ Depleted Below Dark Surface (A11)
- __ Thick Dark Surface (A12)
- __ Iron Monosulfide (A18)
- __ Mesic Spodic (A17) **(MLRA 144A, 145, 149B)**
- __ Sandy Mucky Mineral (S1)
- __ Sandy Gleyed Matrix (S4)
- __ Sandy Redox (S5)
- __ Stripped Matrix (S6)
- __ Dark Surface (S7)
- __ Polyvalue Below Surface (S8) **(LRR R, MLRA 149B)**
- __ Thin Dark Surface (S9) **(LRR R, MLRA 149B)**
- __ High Chroma Sands (S11) **(LRR K, L)**
- __ Loamy Mucky Mineral (F1) **(LRR K, L)**
- __ Loamy Gleyed Matrix (F2)
- __ Depleted Matrix (F3)
- __ Redox Dark Surface (F6)
- __ Depleted Dark Surface (F7)
- __ Redox Depressions (F8)
- __ Marl (F10) **(LRR K, L)**
- __ Red Parent Material (F21) **(MLRA 145)**

Indicators for Problematic Hydric Soils[3]:

- __ 2 cm Muck (A10) **(LRR K, L, MLRA 149B)**
- __ 5 cm Muck Peat or Peat (S3) **(LRR K, L, R)**
- __ Polyvalue Below Surface (S8) **(LRR K, L)**
- __ Thin Dark Surface (S9) **(LRR K, L)**
- __ Iron-Manganese Masses (F12) **(LRR K, L, R)**
- __ Piedmont Floodplain Soils (F19) **(MLRA 149B)**
- __ Red Parent Material (F21) **(outside MLRA 145)**
- __ Very Shallow Dark Surface (F22)
- __ Other (Explain in Remarks)

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

Restrictive Layer (if present):
Type: Fill
Depth (inches): 10

Hydric Soil Present? Yes ____ **No** ✘

Remarks:
The criterion for hydric soil is not met.

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Northcentral and Northeast Region
See ERDC/EL TR-12-1; the proponent agency is CECW-COR

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

Project/Site: Brook Park Ford Plant City/County: Brook Park, Cuyahoga County Sampling Date: 2025-7-25
Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-01_PEM-1
Investigator(s): Erin Van Nort Section, Township, Range: NA
Landform (hillslope, terrace, etc): Depression Local relief (concave, convex, none): Concave Slope (%): 0 to 1
Subregion (LRR or MLRA): MLRA 139 of LRR R Lat: 41.4062392297 Long: -81.8208948001 Datum: WGS84
Soil Map Unit Name: Urban land NWI Classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✘ No ____ (If no, explain in Remarks.)
Are Vegetation ____ , Soil ____ , or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✘ No ____
Are Vegetation ____ , Soil ____ , or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes ✘ No ____
Hydric Soil Present? Yes ✘ No ____
Wetland Hydrology Present? Yes ✘ No ____

Is the Sampled Area within a Wetland? Yes ✘ No ____
If yes, optional Wetland Site ID: W-EVN-01

Remarks: (Explain alternative procedures here or in a separate report.)
Covertype is PEM. Based on the presence of all three parameters, this area is a wetland.

HYDROLOGY

Wetland Hydrology Indicators:
Primary Indicators (minimum of one is required; check all that apply)
- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✘ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ✘ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)
- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✘ FAC-Neutral Test (D5)

Field Observations:
Surface Water Present? Yes ____ No ✘ Depth (inches): ____
Water Table Present? Yes ____ No ✘ Depth (inches): ____
Saturation Present? Yes ✘ No ____ Depth (inches): 4
(includes capillary fringe)

Wetland Hydrology Present? Yes ✘ No ____

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

Remarks:
The criterion for wetland hydrology is met.

VEGETATION ─ Use scientific names of plants. Sampling Point: W-EVN-01_PEM-1

Tree Stratum (Plot size: 30 ft radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Sapling/Shrub Stratum (Plot size: 15 ft radius)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Herb Stratum (Plot size: 5 ft radius)				
1.	*Phragmites australis*	60	Yes	FACW
2.	*Typha angustifolia*	40	Yes	OBL
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
	100	= Total Cover		

Woody Vine Stratum (Plot size: 30 ft radius)			
1.			
2.			
3.			
4.			
	0	= Total Cover	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 2 (A)

Total Number of Dominant Species Across All Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	40	x 1 =	40
FACW species	60	x 2 =	120
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	100 (A)		160 (B)

Prevalence Index = B/A = 1.6

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.

Definitions of Vegetation Strata:

Tree ─ Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub ─ Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb ─ All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines ─ All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** ✘ **No** __

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

The criterion for hydrophytic vegetation is met.

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

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 to 6	10YR 4/2	100					Silt Loam	
6 to 16	N 2.5/	90	10YR 5/6	10	C	M	Clay Loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Iron Monosulfide (A18)
- ___ Mesic Spodic (A17) **(MLRA 144A, 145, 149B)**
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7)
- ___ Polyvalue Below Surface (S8) **(LRR R, MLRA 149B)**
- ___ Thin Dark Surface (S9) **(LRR R, MLRA 149B)**
- ___ High Chroma Sands (S11) **(LRR K, L)**
- ___ Loamy Mucky Mineral (F1) **(LRR K, L)**
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ✘ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Marl (F10) **(LRR K, L)**
- ___ Red Parent Material (F21) **(MLRA 145)**

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) **(LRR K, L, MLRA 149B)**
- ___ 5 cm Muck Peat or Peat (S3) **(LRR K, L, R)**
- ___ Polyvalue Below Surface (S8) **(LRR K, L)**
- ___ Thin Dark Surface (S9) **(LRR K, L)**
- ___ Iron-Manganese Masses (F12) **(LRR K, L, R)**
- ___ Piedmont Floodplain Soils (F19) **(MLRA 149B)**
- ___ Red Parent Material (F21) **(outside MLRA 145)**
- ___ Very Shallow Dark Surface (F22)
- ___ Other (Explain in Remarks)

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

Restrictive Layer (if present):
Type: Fill
Depth (inches): 16

Hydric Soil Present? Yes ✘ **No** ___

Remarks:
The criterion for hydric soil is met.

U.S. Army Corps of Engineers

WETLAND DETERMINATION DATA SHEET – Northcentral and Northeast Region

See ERDC/EL TR-12-1; the proponent agency is CECW-COR

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

Project/Site: Brook Park Ford Plant City/County: Brook Park, Cuyahoga County Sampling Date: 2025-7-25

Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-01_UPL-1

Investigator(s): Erin Van Nort Section, Township, Range: NA

Landform (hillslope, terrace, etc): Mid slope Local relief (concave, convex, none): None Slope (%): 0 to 1

Subregion (LRR or MLRA): MLRA 139 of LRR R Lat: 41.4062681 Long: -81.82097315 Datum: WGS84

Soil Map Unit Name: Urban land NWI Classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✘ No _____ (If no, explain in Remarks.)

Are Vegetation _____ , Soil _____ , or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ✘ No _____

Are Vegetation _____ , Soil _____ , or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes _____ No ✘

Hydric Soil Present? Yes _____ No ✘

Wetland Hydrology Present? Yes _____ No ✘

Is the Sampled Area within a Wetland? **Yes** _____ **No** ✘

If yes, optional Wetland Site ID: W-EVN-01

Remarks: (Explain alternative procedures here or in a separate report.)

Covertype is UPL. Based on the absence of all three parameters, this area is an upland.

HYDROLOGY

Wetland Hydrology Indicators:

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

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ___ FAC-Neutral Test (D5)

Field Observations:

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

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

Saturation Present? (includes capillary fringe) Yes _____ No ✘ Depth (inches): _____

Wetland Hydrology Present? Yes _____ **No** ✘

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

Remarks:

The criterion for wetland hydrology is not met.

VEGETATION ─ Use scientific names of plants. Sampling Point: W-EVN-01_UPL-1

Tree Stratum (Plot size: 30 ft radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Sapling/Shrub Stratum (Plot size: 15 ft radius)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Herb Stratum (Plot size: 5 ft radius)				
1.	*Poa pratensis*	45	Yes	FACU
2.	*Lotus tenuis*	25	Yes	FACU
3.	*Hypochaeris radicata*	20	Yes	FACU
4.	*Cichorium intybus*	10	No	FACU
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
		100	= Total Cover	

Woody Vine Stratum (Plot size: 30 ft radius)			
1.			
2.			
3.			
4.			
	0	= Total Cover	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	100	x 4 =	400
UPL species	0	x 5 =	0
Column Totals:	100 (A)		400 (B)

Prevalence Index = B/A = 4

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.

Definitions of Vegetation Strata:

Tree ─ Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub ─ Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb ─ All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines ─ All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** __ **No** ✘

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

The criterion for hydrophytic vegetation is not met.

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

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 to 4	10YR 5/3	100					Silt Loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- __ Histosol (A1)
- __ Histic Epipedon (A2)
- __ Black Histic (A3)
- __ Hydrogen Sulfide (A4)
- __ Stratified Layers (A5)
- __ Depleted Below Dark Surface (A11)
- __ Thick Dark Surface (A12)
- __ Iron Monosulfide (A18)
- __ Mesic Spodic (A17) **(MLRA 144A, 145, 149B)**
- __ Sandy Mucky Mineral (S1)
- __ Sandy Gleyed Matrix (S4)
- __ Sandy Redox (S5)
- __ Stripped Matrix (S6)
- __ Dark Surface (S7)
- __ Polyvalue Below Surface (S8) **(LRR R, MLRA 149B)**
- __ Thin Dark Surface (S9) **(LRR R, MLRA 149B)**
- __ High Chroma Sands (S11) **(LRR K, L)**
- __ Loamy Mucky Mineral (F1) **(LRR K, L)**
- __ Loamy Gleyed Matrix (F2)
- __ Depleted Matrix (F3)
- __ Redox Dark Surface (F6)
- __ Depleted Dark Surface (F7)
- __ Redox Depressions (F8)
- __ Marl (F10) **(LRR K, L)**
- __ Red Parent Material (F21) **(MLRA 145)**

Indicators for Problematic Hydric Soils[3]:

- __ 2 cm Muck (A10) **(LRR K, L, MLRA 149B)**
- __ 5 cm Muck Peat or Peat (S3) **(LRR K, L, R)**
- __ Polyvalue Below Surface (S8) **(LRR K, L)**
- __ Thin Dark Surface (S9) **(LRR K, L)**
- __ Iron-Manganese Masses (F12) **(LRR K, L, R)**
- __ Piedmont Floodplain Soils (F19) **(MLRA 149B)**
- __ Red Parent Material (F21) **(outside MLRA 145)**
- __ Very Shallow Dark Surface (F22)
- __ Other (Explain in Remarks)

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

Restrictive Layer (if present):
Type: Fill
Depth (inches): 4

Hydric Soil Present? Yes ____ **No** ✘

Remarks:
The criterion for hydric soil is not met.

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Northcentral and Northeast Region
See ERDC/EL TR-12-1; the proponent agency is CECW-COR

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

Project/Site: Brook Park Ford Plant City/County: Brook Park, Cuyahoga County Sampling Date: 2025-7-25
Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-02_PEM-1
Investigator(s): Erin Van Nort Section, Township, Range: NA
Landform (hillslope, terrace, etc): Depression Local relief (concave, convex, none): Concave Slope (%): 0 to 1
Subregion (LRR or MLRA): MLRA 139 of LRR R Lat: 41.4089738927 Long: -81.8227513956 Datum: WGS84
Soil Map Unit Name: Urban land NWI Classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✘ No ____ (If no, explain in Remarks.)
Are Vegetation ____ , Soil ____ , or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✘ No ____
Are Vegetation ____ , Soil ____ , or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes ✘ No ____
Hydric Soil Present? Yes ✘ No ____
Wetland Hydrology Present? Yes ✘ No ____

Is the Sampled Area within a Wetland? Yes ✘ No ____
If yes, optional Wetland Site ID: W-EVN-02

Remarks: (Explain alternative procedures here or in a separate report.)
Covertype is PEM. Based on the presence of all three parameters, this area is a wetland.

HYDROLOGY

Wetland Hydrology Indicators:
Primary Indicators (minimum of one is required; check all that apply)
- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ✘ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ✘ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)
- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ✘ FAC-Neutral Test (D5)

Field Observations:
Surface Water Present? Yes ____ No ✘ Depth (inches): ____
Water Table Present? Yes ____ No ✘ Depth (inches): ____
Saturation Present? Yes ✘ No ____ Depth (inches): 4
(includes capillary fringe)

Wetland Hydrology Present? Yes ✘ No ____

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

Remarks:
The criterion for wetland hydrology is met.

VEGETATION ─ Use scientific names of plants. Sampling Point: W-EVN-02_PEM-1

Tree Stratum (Plot size: 30 ft radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Sapling/Shrub Stratum (Plot size: 15 ft radius)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Herb Stratum (Plot size: 5 ft radius)				
1.	*Typha angustifolia*	40	Yes	OBL
2.	*Phragmites australis*	35	Yes	FACW
3.	*Lythrum salicaria*	25	Yes	OBL
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
		100	= Total Cover	

Woody Vine Stratum (Plot size: 30 ft radius)			
1.			
2.			
3.			
4.			
	0	= Total Cover	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 3 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	65	x 1 =	65
FACW species	35	x 2 =	70
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	100 (A)		135 (B)

Prevalence Index = B/A = 1.4

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.

Definitions of Vegetation Strata:

Tree ─ Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub ─ Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb ─ All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines ─ All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** ✘ **No** __

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

The criterion for hydrophytic vegetation is met.

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

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 to 6	10YR 4/2	100					Silt Loam	
6 to 12	N 2.5/	90	10YR 6/6	10	C	M	Silt Loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Iron Monosulfide (A18)
- ___ Mesic Spodic (A17) **(MLRA 144A, 145, 149B)**
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7)
- ___ Polyvalue Below Surface (S8) **(LRR R, MLRA 149B)**
- ___ Thin Dark Surface (S9) **(LRR R, MLRA 149B)**
- ___ High Chroma Sands (S11) **(LRR K, L)**
- ___ Loamy Mucky Mineral (F1) **(LRR K, L)**
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ✘ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Marl (F10) **(LRR K, L)**
- ___ Red Parent Material (F21) **(MLRA 145)**

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) **(LRR K, L, MLRA 149B)**
- ___ 5 cm Muck Peat or Peat (S3) **(LRR K, L, R)**
- ___ Polyvalue Below Surface (S8) **(LRR K, L)**
- ___ Thin Dark Surface (S9) **(LRR K, L)**
- ___ Iron-Manganese Masses (F12) **(LRR K, L, R)**
- ___ Piedmont Floodplain Soils (F19) **(MLRA 149B)**
- ___ Red Parent Material (F21) **(outside MLRA 145)**
- ___ Very Shallow Dark Surface (F22)
- ___ Other (Explain in Remarks)

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

Restrictive Layer (if present):
Type: Fill
Depth (inches): 12

Hydric Soil Present? Yes ✘ **No** ___

Remarks:
The criterion for hydric soil is met.

U.S. Army Corps of Engineers
WETLAND DETERMINATION DATA SHEET – Northcentral and Northeast Region
See ERDC/EL TR-12-1; the proponent agency is CECW-COR

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

Project/Site: Brook Park Ford Plant City/County: Brook Park, Cuyahoga County Sampling Date: 2025-7-25
Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-02_UPL-1
Investigator(s): Erin Van Nort Section, Township, Range: NA
Landform (hillslope, terrace, etc): Mid slope Local relief (concave, convex, none): None Slope (%): 0 to 1
Subregion (LRR or MLRA): MLRA 139 of LRR R Lat: 41.4032960931 Long: -81.8196540235 Datum: WGS84
Soil Map Unit Name: Udorthents, loamy NWI Classification: None
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ✘ No ____ (If no, explain in Remarks.)
Are Vegetation ____ , Soil ____ , or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✘ No ____
Are Vegetation ____ , Soil ____ , or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes ____ No ✘
Hydric Soil Present? Yes ____ No ✘
Wetland Hydrology Present? Yes ____ No ✘

Is the Sampled Area within a Wetland? **Yes** ____ **No** ✘

If yes, optional Wetland Site ID: W-EVN-02

Remarks: (Explain alternative procedures here or in a separate report.)
Covertype is UPL. Based on the absence of all three parameters, this area is an upland.

HYDROLOGY

Wetland Hydrology Indicators:
Primary Indicators (minimum of one is required; check all that apply)
- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)
- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ___ FAC-Neutral Test (D5)

Field Observations:
Surface Water Present? Yes ____ No ✘ Depth (inches): ____
Water Table Present? Yes ____ No ✘ Depth (inches): ____
Saturation Present? (includes capillary fringe) Yes ____ No ✘ Depth (inches): ____

Wetland Hydrology Present? Yes ____ **No** ✘

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

Remarks:
The criterion for wetland hydrology is not met.

VEGETATION ─ Use scientific names of plants. Sampling Point: W-EVN-02_UPL-1

Tree Stratum (Plot size: 30 ft radius)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Sapling/Shrub Stratum (Plot size: 15 ft radius)			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
	0	= Total Cover	

Herb Stratum (Plot size: 5 ft radius)				
1.	*Poa compressa*	45	Yes	FACU
2.	*Lotus tenuis*	30	Yes	FACU
3.	*Dianthus armeria*	20	Yes	UPL
4.	*Plantago lanceolata*	5	No	FACU
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
		100	= Total Cover	

Woody Vine Stratum (Plot size: 30 ft radius)			
1.			
2.			
3.			
4.			
	0	= Total Cover	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	80	x 4 =	320
UPL species	20	x 5 =	100
Column Totals:	100 (A)		420 (B)

Prevalence Index = B/A = 4.2

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.

Definitions of Vegetation Strata:

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Sapling/shrub ─ Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb ─ All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines ─ All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? **Yes** __ **No** ✘

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

The criterion for hydrophytic vegetation is not met.

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

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 to 4	10YR 4/3	100					Silt Loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Iron Monosulfide (A18)
- ___ Mesic Spodic (A17) **(MLRA 144A, 145, 149B)**
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7)
- ___ Polyvalue Below Surface (S8) **(LRR R, MLRA 149B)**
- ___ Thin Dark Surface (S9) **(LRR R, MLRA 149B)**
- ___ High Chroma Sands (S11) **(LRR K, L)**
- ___ Loamy Mucky Mineral (F1) **(LRR K, L)**
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Marl (F10) **(LRR K, L)**
- ___ Red Parent Material (F21) **(MLRA 145)**

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) **(LRR K, L, MLRA 149B)**
- ___ 5 cm Muck Peat or Peat (S3) **(LRR K, L, R)**
- ___ Polyvalue Below Surface (S8) **(LRR K, L)**
- ___ Thin Dark Surface (S9) **(LRR K, L)**
- ___ Iron-Manganese Masses (F12) **(LRR K, L, R)**
- ___ Piedmont Floodplain Soils (F19) **(MLRA 149B)**
- ___ Red Parent Material (F21) **(outside MLRA 145)**
- ___ Very Shallow Dark Surface (F22)
- ___ Other (Explain in Remarks)

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

Restrictive Layer (if present):
Type: Fill
Depth (inches): 4

Hydric Soil Present? Yes ___ **No** ✘

Remarks:
The criterion for hydric soil is not met.

OEPA - ORAM Forms

Background Information

Name: Erin Van Nort
Date: 7/25/2025
Affiliation: TRC Environmental Corporation
Address: 1382 West Ninth Street, Suite 400 Cleveland, OH 44113
Phone Number: (216) 347-3342
e-mail address: evannort@trccompanies.com
Name of Wetland: W-EVN-1
Vegetation Communit(ies): PEM
HGM Class(es): Depression
Location of Wetland: include map, address, north arrow, landmarks, distances, roads, etc. Wetland W-EVN-1 is located between the east and westbound lanes of Engle Road in the city of Brook Park, Cuyahoga County, Ohio.

Lat/Long or UTM Coordinate	41.406357, -81.820864
USGS Quad Name	Lakewood, OH
County	Cuyahoga
Township	Urban
Section and Subsection	S10 T6N R14W
Hydrologic Unit Code	04110002 0603
Site Visit	7/25/2025
National Wetland Inventory Map	None
Ohio Wetland Inventory Map	N/A
Soil Survey	Ub
Delineation report/map	See Report

Name of Wetland: W-EVN-1		
Wetland Size (acres, hectares):	Acreage on-site (Estimated Acreage of Contiguous Wetland)	0.053 (~0.22 Acre)

Sketch: Include north arrow, relationship with other surface waters, vegetation zones, etc.

See Figure 5: Delineated Resources Map and Surface Water Delineation Technincal Memo for further details.

Comments, Narrative Discussion, Justification of Category Changes:

Final score : 13	**Category:**	1

Scoring Boundary Worksheet

INSTRUCTIONS. The initial step in completing the ORAM is to identify the "scoring boundaries" of the wetland being rated. In many instances this determination will be relatively easy and the scoring boundaries will coincide with the "jurisdictional boundaries." For example, the scoring boundary of an isolated cattail marsh located in the middle of a farm field will likely be the same as that wetland's jurisdictional boundaries. In other instances, however, the scoring boundary will not be as easily determined. Wetlands that are small or isolated from other surface waters often form large contiguous areas or heterogeneous complexes of wetland and upland. In separating wetlands for scoring purposes, the hydrologic regime of the wetland is the main criterion that should be used. Boundaries between contiguous or connected wetlands should be established where the volume, flow, or velocity of water moving through the wetland changes significantly. *Areas with a high degree of hydrologic interaction should be scored as a single wetland*. In determining a wetland's scoring boundaries, use the guidelines in the ORAM Manual Section 5.0. In certain instances, it may be difficult to establish the scoring boundary for the wetland being rated. These problem situations include wetlands that form a patchwork on the landscape, wetlands divided by artificial boundaries like property fences, roads, or railroad embankments, wetlands that are contiguous with streams, lakes, or rivers, and estuarine or coastal wetlands. These situations are discussed below, however, it is recommended that Rater contact Ohio EPA, Division of Surface Water, 401/Wetlands Section if there are additional questions or a need for further clarification of the appropriate scoring boundaries of a particular wetland.

#	Steps in properly establishing scoring boundaries	done?	not applicable
Step 1	Identify the wetland area of interest. This may be the site of a proposed impact, a reference site, conservation site, etc.	X	
Step 2	Identify the locations where there is physical evidence that hydrology changes rapidly. Such evidence includes both natural and human-induced changes including, constrictions caused by berms or dikes, points where the water velocity changes rapidly at rapids or falls, points where significant inflows occur at the confluence of rivers, or other factors that may restrict hydrologic interaction between the wetlands or parts of a single wetland.	X	
Step 3	Delineate the boundary of the wetland to be rated such that all areas of interest that are contiguous to and within the areas where the hydrology does not change significantly, i.e. areas that have a high degree of hydrologic interaction are included within the scoring boundary.	X	
Step 4	Determine if artificial boundaries, such as property lines, state lines, roads, railroad embankments, etc., are present. These should not be used to establish scoring boundaries unless they coincide with areas where the hydrologic regime changes.	X	
Step 5	In all instances, the Rater may enlarge the minimum scoring boundaries discussed here to score together wetlands that could be scored separately.		X
Step 6	Consult ORAM Manual Section 5.0 for how to establish scoring boundaries for wetlands that form a patchwork on the landscape, divided by artificial boundaries, contiguous to streams, lakes or rivers, or for dual classifications.	X	

End of Scoring Boundary Determination. Begin Narrative Rating on next page.

Narrative Rating

INSTRUCTIONS. Answer each of the following questions. Questions 1, 2, 3 and 4 should be answered based on information obtained from the site visit or the literature *and* by submitting a Data Services Request to the Ohio Department of Natural Resources, Division of Natural Areas and Preserves, Natural Heritage Data Services, 1889 Fountain Square Court, Building F-1, Columbus, Ohio 43224, 614-265-6453 (phone), 614-265-3096 (fax), http://www.dnr.state.oh.us/dnap . The remaining questions are designed to be answered primarily by the results of the site visit. Refer to the User's Manual for descriptions of these wetland types. Note: "Critical habitat" is legally defined in the Endangered Species Act and is the geographic area containing physical or biological features essential to the conservation of a listed species or as an area that may require special management considerations or protection. The Rater should contact the Region 3 Headquarters or the Columbus Ecological Services Office for updates as to whether critical habitat has been designated for other federally listed threatened or endangered species. "Documented" means the wetland is listed in the appropriate State of Ohio database.

#	Question	Circle one	
1	**Critical Habitat.** Is the wetland in a township, section, or subsection of a United States Geological Survey 7.5 minute Quadrangle that has been designated by the U.S. Fish and Wildlife Service as "critical habitat" for any threatened or endangered plant or animal species? Note: as of January 1, 2001, of the federally listed endangered or threatened species which can be found in Ohio, the Indiana Bat has had critical habitat designated (50 CFR 17.95(a)) and the piping plover has had critical habitat proposed (65 FR 41812 July 6, 2000).	YES Wetland should be evaluated for possible Category 3 status Go to Question 2	(NO) Go to Question 2
2	**Threatened or Endangered Species.** Is the wetland known to contain an individual of, or documented occurrences of federal or state-listed threatened or endangered plant or animal species?	YES Wetland is a Category 3 wetland. Go to Question 3	(NO) Go to Question 3
3	**Documented High Quality Wetland.** Is the wetland on record in Natural Heritage Database as a high quality wetland?	YES Wetland is a Category 3 wetland Go to Question 4	(NO) Go to Question 4
4	**Significant Breeding or Concentration Area.** Does the wetland contain documented regionally significant breeding or nonbreeding waterfowl, neotropical songbird, or shorebird concentration areas?	YES Wetland is a Category 3 wetland Go to Question 5	(NO) Go to Question 5
5	**Category 1 Wetlands.** Is the wetland less than 0.5 hectares (1 acre) in size and **hydrologically isolated** and either 1) comprised of vegetation that is dominated (greater than eighty per cent areal cover) by *Phalaris arundinacea, Lythrum salicaria,* or *Phragmites australis*, or 2) an acidic pond created or excavated on mined lands that has little or no vegetation?	YES Wetland is a Category 1 wetland Go to Question 6	(NO) Go to Question 6
6	**Bogs.** Is the wetland a peat-accumulating wetland that 1) has no significant inflows or outflows, 2) supports acidophilic mosses, particularly *Sphagnum* spp., 3) the acidophilic mosses have >30% cover, 4) at least one species from Table 1 is present, and 5) the cover of invasive species (see Table 1) is <25%?	YES Wetland is a Category 3 wetland Go to Question 7	(NO) Go to Question 7
7	**Fens.** Is the wetland a carbon accumulating (peat, muck) wetland that is saturated during most of the year, primarily by a discharge of free flowing, mineral rich, ground water with a circumneutral ph (5.5-9.0) and with one or more plant species listed in Table 1 and the cover of invasive species listed in Table 1 is <25%?	YES Wetland is a Category 3 wetland Go to Question 8a	(NO) Go to Question 8a
8a	**"Old Growth Forest."** Is the wetland a forested wetland and is the forest characterized by, but not limited to, the following characteristics: overstory canopy trees of great age (exceeding at least 50% of a projected maximum attainable age for a species); little or no evidence of human-caused understory disturbance during the past 80 to 100 years; an all-aged structure and multilayered canopies; aggregations of canopy trees interspersed with canopy gaps; and significant numbers of standing dead snags and downed logs?	YES Wetland is a Category 3 wetland. Go to Question 8b	(NO) Go to Question 8b

8b	**Mature forested wetlands**. Is the wetland a forested wetland with 50% or more of the cover of upper forest canopy consisting of deciduous trees with large diameters at breast height (dbh), generally diameters greater than 45cm (17.7in) dbh?	YES Wetland should be evaluated for possible Category 3 status. Go to Question 9a	NO Go to Question 9a
9a	**Lake Erie coastal and tributary wetlands**. Is the wetland located at an elevation less than 575 feet on the USGS map, adjacent to this elevation, or along a tributary to Lake Erie that is accessible to fish?	YES Go to Question 9b	NO Go to Question 10
9b	Does the wetland's hydrology result from measures designed to prevent erosion and the loss of aquatic plants, i.e. the wetland is partially hydrologically restricted from Lake Erie due to lakeward or landward dikes or other hydrological controls?	YES Wetland should be evaluated for possible Category 3 status Go to Question 10	NO Go to Question 9c
9c	Are Lake Erie water levels the wetland's primary hydrological influence, i.e. the wetland is hydrologically unrestricted (no lakeward or upland border alterations), or the wetland can be characterized as an "estuarine" wetland with lake and river influenced hydrology. These include sandbar deposition wetlands, estuarine wetlands, river mouth wetlands, or those dominated by submersed aquatic vegetation.	YES Go to Question 9d	NO Go to Question 10
9d	Does the wetland have a predominance of native species within its vegetation communities, although non-native or disturbance tolerant native species can also be present?	YES Wetland is a Category 3 wetland Go to Question 10	NO Go to Question 9e
9e	Does the wetland have a predominance of non-native or disturbance tolerant native plant species within its vegetation communities?	YES Wetland should be evaluated for possible Category 3 status Go to Question 10	NO Go to Question 10
10	**Lake Plain Sand Prairies (Oak Openings)** Is the wetland located in Lucas, Fulton, Henry, or Wood Counties and can the wetland be characterized by the following description: the wetland has a sandy substrate with interspersed organic matter, a water table often within several inches of the surface, and often with a dominance of the gramineous vegetation listed in Table 1 (woody species may also be present). The Ohio Department of Natural Resources Division of Natural Areas and Preserves can provide assistance in confirming this type of wetland and its quality.	YES Wetland is a Category 3 wetland. Go to Question 11	NO Go to Question 11
11	**Relict Wet Prairies**. Is the wetland a relict wet prairie community dominated by some or all of the species in Table 1. Extensive prairies were formerly located in the Darby Plains (Madison and Union Counties), Sandusky Plains (Wyandot, Crawford, and Marion Counties), northwest Ohio (e.g. Erie, Huron, Lucas, Wood Counties), and portions of western Ohio Counties (e.g. Darke, Mercer, Miami, Montgomery, Van Wert etc.).	YES Wetland should be evaluated for possible Category 3 status Complete Quantitative Rating	NO Complete Quantitative Rating

Table 1. Characteristic plant species.

invasive/exotic spp	fen species	bog species	0ak Opening species	wet prairie species
Lythrum salicaria	*Zygadenus elegans var. glaucus*	*Calla palustris*	*Carex cryptolepis*	*Calamagrostis canadensis*
Myriophyllum spicatum	*Cacalia plantaginea*	*Carex atlantica var. capillacea*	*Carex lasiocarpa*	*Calamogrostis stricta*
Najas minor	*Carex flava*	*Carex echinata*	*Carex stricta*	*Carex atherodes*
Phalaris arundinacea	*Carex sterilis*	*Carex oligosperma*	*Cladium mariscoides*	*Carex buxbaumii*
Phragmites australis	*Carex stricta*	*Carex trisperma*	*Calamagrostis stricta*	*Carex pellita*
Potamogeton crispus	*Deschampsia caespitosa*	*Chamaedaphne calyculata*	*Calamagrostis canadensis*	*Carex sartwellii*
Ranunculus ficaria	*Eleocharis rostellata*	*Decodon verticillatus*	*Quercus palustris*	*Gentiana andrewsii*
Rhamnus frangula	*Eriophorum viridicarinatum*	*Eriophorum virginicum*		*Helianthus grosseserratus*
Typha angustifolia	*Gentianopsis spp.*	*Larix laricina*		*Liatris spicata*
Typha xglauca	*Lobelia kalmii*	*Nemopanthus mucronatus*		*Lysimachia quadriflora*
	Parnassia glauca	*Schechzeria palustris*		*Lythrum alatum*
	Potentilla fruticosa	*Sphagnum spp.*		*Pycnanthemum virginianum*
	Rhamnus alnifolia	*Vaccinium macrocarpon*		*Silphium terebinthinaceum*
	Rhynchospora capillacea	*Vaccinium corymbosum*		*Sorghastrum nutans*
	Salix candida	*Vaccinium oxycoccos*		*Spartina pectinata*
	Salix myricoides	*Woodwardia virginica*		*Solidago riddellii*
	Salix serissima	*Xyris difformis*		
	Solidago ohioensis			
	Tofieldia glutinosa			
	Triglochin maritimum			
	Triglochin palustre			

End of Narrative Rating. Begin Quantitative Rating on next page.

Site: FirstEnergy, Brook Park Ford Plant	Rater(s): Erin Van Nort	Date: 2025-07-25

Metric 1. Wetland Area (size).

1 (max 6 pts.) | 1 (subtotal)

Select one size class and assign score.

- [ ] >50 acres (>20.2ha) (6 pts)
- [ ] 25 to <50 acres (10.1 to <20.2ha) (5 pts)
- [ ] 10 to <25 acres (4 to <10.1ha) (4 pts)
- [ ] 3 to <10 acres (1.2 to <4ha) (3 pts)
- [ ] 0.3 to <3 acres (0.12 to <1.2ha) (2pts)
- [x] 0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
- [ ] <0.1 acres (0.04ha) (0 pts)

Metric 2. Upland buffers and surrounding land use.

1 (max 14 pts.) | 2 (subtotal)

2a. Calculate average buffer width. Select only one and assign score. Do not double check.

- [ ] WIDE. Buffers average 50m (164ft) or more around wetland perimeter (7)
- [ ] MEDIUM. Buffers average 25m to <50m (82 to <164ft) around wetland perimeter (4)
- [ ] NARROW. Buffers average 10m to <25m (32ft to <82ft) around wetland perimeter (1)
- [x] VERY NARROW. Buffers average <10m (<32ft) around wetland perimeter (0)

2b. Intensity of surrounding land use. Select one or double check and average.

- [ ] VERY LOW. 2nd growth or older forest, prairie, savannah, wildlife area, etc. (7)
- [ ] LOW. Old field (>10 years), shrub land, young second growth forest. (5)
- [ ] MODERATELY HIGH. Residential, fenced pasture, park, conservation tillage, new fallow field. (3)
- [x] HIGH. Urban, industrial, open pasture, row cropping, mining, construction. (1)

Metric 3. Hydrology.

9 (max 30 pts.) | 11 (subtotal)

3a. Sources of Water. Score all that apply.

- [ ] High pH groundwater (5)
- [ ] Other groundwater (3)
- [x] Precipitation (1)
- [ ] Seasonal/Intermittent surface water (3)
- [ ] Perennial surface water (lake or stream) (5)

3b. Connectivity. Score all that apply.

- [ ] 100 year floodplain (1)
- [ ] Between stream/lake and other human use (1)
- [x] Part of wetland/upland (e.g. forest), complex (1)
- [ ] Part of riparian or upland corridor (1)

3c. Maximum water depth. Select only one and assign score.

- [ ] >0.7 m (>27.6 in) (3)
- [ ] 0.4 to 0.7 m (15.7 to 27.6 in) (2)
- [x] <0.4 m (<15.7 in) (1)

3d. Duration inundation/saturation. Score one or dbl check.

- [ ] Semi- to permanently inundated/saturated (4)
- [x] Regularly inundated/saturated (3)
- [ ] Seasonally inundated (2)
- [ ] Seasonally saturated in upper 30cm (12in) (1)

3e. Modifications to natural hydrologic regime. Score one or double check and average.

- [ ] None or none apparent (12)
- [ ] Recovered (7)
- [x] Recovering (3)
- [ ] Recent or no recovery (1)

Check all disturbances observed

[x]	ditch	[ ]	point source (nonstormwater)
[ ]	tile	[x]	filling/grading
[ ]	dike	[ ]	road bed/RR track
[ ]	weir	[ ]	dredging
[x]	stormwater input	[ ]	other

Metric 4. Habitat Alteration and Development.

6 (max 20 pts.) | 17 (subtotal)

4a. Substrate disturbance. Score one or double check and average.

- [ ] None or none apparent (4)
- [ ] Recovered (3)
- [x] Recovering (2)
- [ ] Recent or no recovery (1)

4b. Habitat development. Select only one and assign score.

- [ ] Excellent (7)
- [ ] Very good (6)
- [ ] Good (5)
- [ ] Moderately good (4)
- [ ] Fair (3)
- [ ] Poor to fair (2)
- [x] Poor (1)

4c. Habitat alteration. Score one or double check and average.

- [ ] None or none apparent (9)
- [ ] Recovered (6)
- [x] Recovering (3)
- [ ] Recent or no recovery (1)

Check all disturbances observed

[x]	mowing	[ ]	shrub/sapling removal
[ ]	grazing	[ ]	herbaceous/aquatic bed removal
[ ]	clearcutting	[x]	sedimentation
[ ]	selective cutting	[ ]	dredging
[ ]	woody debris removal	[ ]	farming
[ ]	toxic pollutants	[ ]	nutrient enrichment

17 (subtotal this page)

TRC Environmental Corp.
781 Science Boulevard, Suite 200
Gahanna, Ohio 43230

Site: FirstEnergy, Brook Park Ford Plant	Rater(s): Erin Van Nort	Date: 2025-07-25

17
subtotal first page

Metric 5. Special Wetlands.

0 max 10 pts. | 17 subtotal

Check all that apply and score as indicated.

- [ ] Bog (10)
- [ ] Fen (10)
- [ ] Old growth forest (10)
- [ ] Mature forested wetland (5)
- [ ] Lake Erie coastal/tributary wetland-unrestricted hydrology (10)
- [ ] Lake Erie coastal/tributary wetland-restricted hydrology (5)
- [ ] Lake Plain Sand Prairies (Oak Openings) (10)
- [ ] Relict Wet Prairies (10)
- [ ] Known occurrence state/federal threatened or endangered species (10)
- [ ] Significant migratory songbird/water fowl habitat or usage (10)
- [ ] Category 1 Wetland. See Question 1 Qualitative Rating (-10)

Metric 6. Plant communities, interspersion, microtopography.

-4 max 20 pts. | 13 subtotal

6a. Wetland Vegetation Communities.
Score all present using 0 to 3 scale.

- [ ] Aquatic Bed
- [1] Emergent
- [ ] Shrub
- [ ] Forest
- [ ] Mudflats
- [ ] Open water
- [ ] Other _____

6b. horizontal (plan view) Interspersion.
Select only one.

- [ ] High (5)
- [ ] Moderately high (4)
- [ ] Moderate (3)
- [ ] Moderately low (2)
- [ ] Low (1)
- [x] None (0)

Invasive Species Present:
narrow-leaved cattail
phragmites

6c. Coverage of invasive plants. Refer to Table 1 ORAM long form for list. Add or deduct points for coverage

- [x] Extensive >75% cover (-5)
- [ ] Moderate 25-75% cover (-3)
- [ ] Sparse 5-25% cover (-1)
- [ ] Nearly absent <5% cover (0)
- [ ] Absent (1)

6d. Microtopography.
Score all present using 0 to 3 scale.

- [0] Vegetated hummucks/tussucks
- [0] Coarse woody debris >15cm (6in)
- [0] Standing dead >25cm (10in) dbh
- [0] Amphibian breeding pools

Vegetation Community Cover Scale

0	Absent or comprises <0.1ha (0.2471 acres) contiguous area
1	Present and either comprises small part of wetland's vegetation and is of moderate quality, or comprises a significant part but is of low quality
2	Present and either comprises significant part of wetland's vegetation and is of moderate quality or comprises a small part and is of high quality
3	Present and comprises significant part, or more, of wetland's vegetation and is of high quality

Narrative Description of Vegetation Quality

low	Low spp diversity and/or predominance of nonnative or disturbance tolerant native species
mod	Native spp are dominant component of the vegetation, although nonnative and/or disturbance tolerant native spp can also be present, and species diversity moderate to moderately high, but generally w/o presence of rare threatened or endangered spp
high	A predominance of native species, with nonnative spp and/or disturbance tolerant native spp absent or virtually absent, and high spp diversity and often, but not always, the presence of rare, threatened, or endangered spp

Mudflat and Open Water Class Quality

0	Absent <0.1ha (0.247 acres)
1	Low 0.1 to <1ha (0.247 to 2.47 acres)
2	Moderate 1 to <4ha (2.47 to 9.88 acres)
3	High 4ha (9.88 acres) or more

Microtopography Cover Scale

0	Absent
1	Present very small amounts or if more common of marginal quality
2	Present in moderate amounts, but not of highest quality or in small amounts of highest quality
3	Present in moderate or greater amounts and of highest quality

13

CATEGORY 1

End of Quantitative Rating. Complete Categorization Worksheets.

ORAM Summary Worksheet

		circle answer or insert score	Result
Narrative Rating	Question 1 Critical Habitat	YES (NO)	If yes, Category 3.
	Question 2. Threatened or Endangered Species	YES (NO)	If yes, Category 3.
	Question 3. High Quality Natural Wetland	YES (NO)	If yes, Category 3.
	Question 4. Significant bird habitat	YES (NO)	If yes, Category 3.
	Question 5. Category 1 Wetlands	YES (NO)	If yes, Category 1.
	Question 6. Bogs	YES (NO)	If yes, Category 3.
	Question 7. Fens	YES (NO)	If yes, Category 3.
	Question 8a. Old Growth Forest	YES (NO)	If yes, Category 3.
	Question 8b. Mature Forested Wetland	YES (NO)	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9b. Lake Erie Wetlands - Restricted	YES (NO)	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9d. Lake Erie Wetlands – Unrestricted with native plants	YES NO	If yes, Category 3
	Question 9e. Lake Erie Wetlands - Unrestricted with invasive plants	YES NO	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 10. Oak Openings	YES (NO)	If yes, Category 3
	Question 11. Relict Wet Prairies	YES (NO)	If yes, evaluate for Category 3; may also be 1 or 2.
Quantitative Rating	Metric 1. Size	1	
	Metric 2. Buffers and surrounding land use	1	
	Metric 3. Hydrology	9	
	Metric 4. Habitat	6	
	Metric 5. Special Wetland Communities	0	
	Metric 6. Plant communities, interspersion, microtopography	-4	
	TOTAL SCORE	13	Category based on score breakpoints 1

Complete Wetland Categorization Worksheet.

Wetland Categorization Worksheet

Choices	Circle one		Evaluation of Categorization Result of ORAM
Did you answer "Yes" to any of the following questions: Narrative Rating Nos. 2, 3, 4, 6, 7, 8a, 9d, 10	YES Wetland is categorized as a Category 3 wetland	(NO)	Is quantitative rating score *less* than the Category 2 scoring threshold (*excluding* gray zone)? If yes, reevaluate the category of the wetland using the narrative criteria in OAC Rule 3745-1-54(C) and biological and/or functional assessments to determine if the wetland has been over-categorized by the ORAM
Did you answer "Yes" to any of the following questions: Narrative Rating Nos. 1, 8b, 9b, 9e, 11	YES Wetland should be evaluated for possible Category 3 status	(NO)	Evaluate the wetland using the 1) narrative criteria in OAC Rule 3745-1-54(C) and 2) the quantitative rating score. If the wetland is determined to be a Category 3 wetland using either of these, it should be categorized as a Category 3 wetland. Detailed biological and/or functional assessments may also be used to determine the wetland's category.
Did you answer "Yes" to Narrative Rating No. 5	YES Wetland is categorized as a Category 1 wetland	(NO)	Is quantitative rating score *greater* than the Category 2 scoring threshold *(including* any gray zone)? If yes, reevaluate the category of the wetland using the narrative criteria in OAC Rule 3745-1-54(C) and biological and/or functional assessments to determine if the wetland has been under-categorized by the ORAM
Does the quantitative score fall within the scoring range of a Category 1, 2, or 3 wetland?	(YES) Wetland is assigned to the appropriate category based on the scoring range	NO	If the score of the wetland is located within the scoring range for a particular category, the wetland should be assigned to that category. In all instances however, the narrative criteria described in OAC Rule 3745-1-54(C) can be used to clarify or change a categorization based on a quantitative score.
Does the quantitative score fall with the *"gray zone"* for Category 1 or 2 or Category 2 or 3 wetlands?	YES Wetland is assigned to the higher of the two categories or assigned to a category based on detailed assessments and the narrative criteria	(NO)	Rater has the option of assigning the wetland to the higher of the two categories or to assign a category based on the results of a nonrapid wetland assessment method, e.g. functional assessment, biological assessment, etc, and a consideration of the narrative criteria in OAC rule 3745-1-54(C).
Does the wetland otherwise exhibit *moderate OR superior* hydrologic OR habitat, OR recreational functions AND the wetland was *not* categorized as a Category 2 wetland (in the case of moderate functions) or a Category 3 wetland (in the case of superior functions) by this method?	YES Wetland was undercategorized by this method. A written justification for recategorization should be provided on Background Information Form	(NO) Wetland is assigned to category as determined by the ORAM.	A wetland may be undercategorized using this method, but still exhibit one or more superior functions, e.g. a wetland's biotic communities may be degraded by human activities, but the wetland may still exhibit superior hydrologic functions because of its type, landscape position, size, local or regional significance, etc. In this circumstance, the narrative criteria in OAC Rule 3745-1-54(C)(2) and (3) are controlling, and the under-categorization should be corrected. A written justification with supporting reasons or information for this determination should be provided.

Final Category

Choose one	(Category 1)	Category 2	Category 3

End of Ohio Rapid Assessment Method for Wetlands.

Background Information

Name: Erin Van Nort
Date: 7/25/2025
Affiliation: TRC Environmental Corporation
Address: 1382 West Ninth Street, Suite 400 Cleveland, OH 44113
Phone Number: (216) 347-3342
e-mail address: evannort@trccompanies.com
Name of Wetland: W-EVN-2
Vegetation Communit(ies): PEM
HGM Class(es): Depression
Location of Wetland: include map, address, north arrow, landmarks, distances, roads, etc. Wetland W-EVN-2 is located between the east and westbound lanes of Engle Road in the city of Brook Park, Cuyahoga County, Ohio.

Lat/Long or UTM Coordinate	41.405596,-81.821762
USGS Quad Name	Lakewood, OH
County	Cuyahoga
Township	Urban
Section and Subsection	S10 T6N R14W
Hydrologic Unit Code	04110002 0603
Site Visit	7/25/2025
National Wetland Inventory Map	None
Ohio Wetland Inventory Map	N/A
Soil Survey	Ub
Delineation report/map	See Report

Name of Wetland: W-EVN-2		
Wetland Size (acres, hectares):	Acreage on-site (Estimated Acreage of Contiguous Wetland)	0.038 (~0.19 Acre)

Sketch: Include north arrow, relationship with other surface waters, vegetation zones, etc.

See Figure 5: Delineated Resources Map and Surface Water Delineation Technincal Memo for further details.

Comments, Narrative Discussion, Justification of Category Changes:

Final score : 13	**Category:**	1

Scoring Boundary Worksheet

INSTRUCTIONS. The initial step in completing the ORAM is to identify the "scoring boundaries" of the wetland being rated. In many instances this determination will be relatively easy and the scoring boundaries will coincide with the "jurisdictional boundaries." For example, the scoring boundary of an isolated cattail marsh located in the middle of a farm field will likely be the same as that wetland's jurisdictional boundaries. In other instances, however, the scoring boundary will not be as easily determined. Wetlands that are small or isolated from other surface waters often form large contiguous areas or heterogeneous complexes of wetland and upland. In separating wetlands for scoring purposes, the hydrologic regime of the wetland is the main criterion that should be used. Boundaries between contiguous or connected wetlands should be established where the volume, flow, or velocity of water moving through the wetland changes significantly. *Areas with a high degree of hydrologic interaction should be scored as a single wetland*. In determining a wetland's scoring boundaries, use the guidelines in the ORAM Manual Section 5.0. In certain instances, it may be difficult to establish the scoring boundary for the wetland being rated. These problem situations include wetlands that form a patchwork on the landscape, wetlands divided by artificial boundaries like property fences, roads, or railroad embankments, wetlands that are contiguous with streams, lakes, or rivers, and estuarine or coastal wetlands. These situations are discussed below, however, it is recommended that Rater contact Ohio EPA, Division of Surface Water, 401/Wetlands Section if there are additional questions or a need for further clarification of the appropriate scoring boundaries of a particular wetland.

#	Steps in properly establishing scoring boundaries	done?	not applicable
Step 1	Identify the wetland area of interest. This may be the site of a proposed impact, a reference site, conservation site, etc.	X	
Step 2	Identify the locations where there is physical evidence that hydrology changes rapidly. Such evidence includes both natural and human-induced changes including, constrictions caused by berms or dikes, points where the water velocity changes rapidly at rapids or falls, points where significant inflows occur at the confluence of rivers, or other factors that may restrict hydrologic interaction between the wetlands or parts of a single wetland.	X	
Step 3	Delineate the boundary of the wetland to be rated such that all areas of interest that are contiguous to and within the areas where the hydrology does not change significantly, i.e. areas that have a high degree of hydrologic interaction are included within the scoring boundary.	X	
Step 4	Determine if artificial boundaries, such as property lines, state lines, roads, railroad embankments, etc., are present. These should not be used to establish scoring boundaries unless they coincide with areas where the hydrologic regime changes.	X	
Step 5	In all instances, the Rater may enlarge the minimum scoring boundaries discussed here to score together wetlands that could be scored separately.		X
Step 6	Consult ORAM Manual Section 5.0 for how to establish scoring boundaries for wetlands that form a patchwork on the landscape, divided by artificial boundaries, contiguous to streams, lakes or rivers, or for dual classifications.	X	

End of Scoring Boundary Determination. Begin Narrative Rating on next page.

Narrative Rating

INSTRUCTIONS. Answer each of the following questions. Questions 1, 2, 3 and 4 should be answered based on information obtained from the site visit or the literature *and* by submitting a Data Services Request to the Ohio Department of Natural Resources, Division of Natural Areas and Preserves, Natural Heritage Data Services, 1889 Fountain Square Court, Building F-1, Columbus, Ohio 43224, 614-265-6453 (phone), 614-265-3096 (fax), http://www.dnr.state.oh.us/dnap . The remaining questions are designed to be answered primarily by the results of the site visit. Refer to the User's Manual for descriptions of these wetland types. Note: "Critical habitat" is legally defined in the Endangered Species Act and is the geographic area containing physical or biological features essential to the conservation of a listed species or as an area that may require special management considerations or protection. The Rater should contact the Region 3 Headquarters or the Columbus Ecological Services Office for updates as to whether critical habitat has been designated for other federally listed threatened or endangered species. "Documented" means the wetland is listed in the appropriate State of Ohio database.

#	Question	Circle one	
1	**Critical Habitat.** Is the wetland in a township, section, or subsection of a United States Geological Survey 7.5 minute Quadrangle that has been designated by the U.S. Fish and Wildlife Service as "critical habitat" for any threatened or endangered plant or animal species? Note: as of January 1, 2001, of the federally listed endangered or threatened species which can be found in Ohio, the Indiana Bat has had critical habitat designated (50 CFR 17.95(a)) and the piping plover has had critical habitat proposed (65 FR 41812 July 6, 2000).	YES Wetland should be evaluated for possible Category 3 status Go to Question 2	(NO) Go to Question 2
2	**Threatened or Endangered Species.** Is the wetland known to contain an individual of, or documented occurrences of federal or state-listed threatened or endangered plant or animal species?	YES Wetland is a Category 3 wetland. Go to Question 3	(NO) Go to Question 3
3	**Documented High Quality Wetland.** Is the wetland on record in Natural Heritage Database as a high quality wetland?	YES Wetland is a Category 3 wetland Go to Question 4	(NO) Go to Question 4
4	**Significant Breeding or Concentration Area.** Does the wetland contain documented regionally significant breeding or nonbreeding waterfowl, neotropical songbird, or shorebird concentration areas?	YES Wetland is a Category 3 wetland Go to Question 5	(NO) Go to Question 5
5	**Category 1 Wetlands.** Is the wetland less than 0.5 hectares (1 acre) in size and **hydrologically isolated** and either 1) comprised of vegetation that is dominated (greater than eighty per cent areal cover) by *Phalaris arundinacea, Lythrum salicaria,* or *Phragmites australis*, or 2) an acidic pond created or excavated on mined lands that has little or no vegetation?	YES Wetland is a Category 1 wetland Go to Question 6	(NO) Go to Question 6
6	**Bogs.** Is the wetland a peat-accumulating wetland that 1) has no significant inflows or outflows, 2) supports acidophilic mosses, particularly *Sphagnum* spp., 3) the acidophilic mosses have >30% cover, 4) at least one species from Table 1 is present, and 5) the cover of invasive species (see Table 1) is <25%?	YES Wetland is a Category 3 wetland Go to Question 7	(NO) Go to Question 7
7	**Fens.** Is the wetland a carbon accumulating (peat, muck) wetland that is saturated during most of the year, primarily by a discharge of free flowing, mineral rich, ground water with a circumneutral ph (5.5-9.0) and with one or more plant species listed in Table 1 and the cover of invasive species listed in Table 1 is <25%?	YES Wetland is a Category 3 wetland Go to Question 8a	(NO) Go to Question 8a
8a	**"Old Growth Forest."** Is the wetland a forested wetland and is the forest characterized by, but not limited to, the following characteristics: overstory canopy trees of great age (exceeding at least 50% of a projected maximum attainable age for a species); little or no evidence of human-caused understory disturbance during the past 80 to 100 years; an all-aged structure and multilayered canopies; aggregations of canopy trees interspersed with canopy gaps; and significant numbers of standing dead snags and downed logs?	YES Wetland is a Category 3 wetland. Go to Question 8b	(NO) Go to Question 8b

8b	**Mature forested wetlands**. Is the wetland a forested wetland with 50% or more of the cover of upper forest canopy consisting of deciduous trees with large diameters at breast height (dbh), generally diameters greater than 45cm (17.7in) dbh?	YES Wetland should be evaluated for possible Category 3 status. Go to Question 9a	NO Go to Question 9a
9a	**Lake Erie coastal and tributary wetlands**. Is the wetland located at an elevation less than 575 feet on the USGS map, adjacent to this elevation, or along a tributary to Lake Erie that is accessible to fish?	YES Go to Question 9b	NO Go to Question 10
9b	Does the wetland's hydrology result from measures designed to prevent erosion and the loss of aquatic plants, i.e. the wetland is partially hydrologically restricted from Lake Erie due to lakeward or landward dikes or other hydrological controls?	YES Wetland should be evaluated for possible Category 3 status Go to Question 10	NO Go to Question 9c
9c	Are Lake Erie water levels the wetland's primary hydrological influence, i.e. the wetland is hydrologically unrestricted (no lakeward or upland border alterations), or the wetland can be characterized as an "estuarine" wetland with lake and river influenced hydrology. These include sandbar deposition wetlands, estuarine wetlands, river mouth wetlands, or those dominated by submersed aquatic vegetation.	YES Go to Question 9d	NO Go to Question 10
9d	Does the wetland have a predominance of native species within its vegetation communities, although non-native or disturbance tolerant native species can also be present?	YES Wetland is a Category 3 wetland Go to Question 10	NO Go to Question 9e
9e	Does the wetland have a predominance of non-native or disturbance tolerant native plant species within its vegetation communities?	YES Wetland should be evaluated for possible Category 3 status Go to Question 10	NO Go to Question 10
10	**Lake Plain Sand Prairies (Oak Openings)** Is the wetland located in Lucas, Fulton, Henry, or Wood Counties and can the wetland be characterized by the following description: the wetland has a sandy substrate with interspersed organic matter, a water table often within several inches of the surface, and often with a dominance of the gramineous vegetation listed in Table 1 (woody species may also be present). The Ohio Department of Natural Resources Division of Natural Areas and Preserves can provide assistance in confirming this type of wetland and its quality.	YES Wetland is a Category 3 wetland. Go to Question 11	NO Go to Question 11
11	**Relict Wet Prairies**. Is the wetland a relict wet prairie community dominated by some or all of the species in Table 1. Extensive prairies were formerly located in the Darby Plains (Madison and Union Counties), Sandusky Plains (Wyandot, Crawford, and Marion Counties), northwest Ohio (e.g. Erie, Huron, Lucas, Wood Counties), and portions of western Ohio Counties (e.g. Darke, Mercer, Miami, Montgomery, Van Wert etc.).	YES Wetland should be evaluated for possible Category 3 status Complete Quantitative Rating	NO Complete Quantitative Rating

Table 1. Characteristic plant species.

invasive/exotic spp	fen species	bog species	0ak Opening species	wet prairie species
Lythrum salicaria	*Zygadenus elegans var. glaucus*	*Calla palustris*	*Carex cryptolepis*	*Calamagrostis canadensis*
Myriophyllum spicatum	*Cacalia plantaginea*	*Carex atlantica var. capillacea*	*Carex lasiocarpa*	*Calamogrostis stricta*
Najas minor	*Carex flava*	*Carex echinata*	*Carex stricta*	*Carex atherodes*
Phalaris arundinacea	*Carex sterilis*	*Carex oligosperma*	*Cladium mariscoides*	*Carex buxbaumii*
Phragmites australis	*Carex stricta*	*Carex trisperma*	*Calamagrostis stricta*	*Carex pellita*
Potamogeton crispus	*Deschampsia caespitosa*	*Chamaedaphne calyculata*	*Calamagrostis canadensis*	*Carex sartwellii*
Ranunculus ficaria	*Eleocharis rostellata*	*Decodon verticillatus*	*Quercus palustris*	*Gentiana andrewsii*
Rhamnus frangula	*Eriophorum viridicarinatum*	*Eriophorum virginicum*		*Helianthus grosseserratus*
Typha angustifolia	*Gentianopsis spp.*	*Larix laricina*		*Liatris spicata*
Typha xglauca	*Lobelia kalmii*	*Nemopanthus mucronatus*		*Lysimachia quadriflora*
	Parnassia glauca	*Schechzeria palustris*		*Lythrum alatum*
	Potentilla fruticosa	*Sphagnum spp.*		*Pycnanthemum virginianum*
	Rhamnus alnifolia	*Vaccinium macrocarpon*		*Silphium terebinthinaceum*
	Rhynchospora capillacea	*Vaccinium corymbosum*		*Sorghastrum nutans*
	Salix candida	*Vaccinium oxycoccos*		*Spartina pectinata*
	Salix myricoides	*Woodwardia virginica*		*Solidago riddellii*
	Salix serissima	*Xyris difformis*		
	Solidago ohioensis			
	Tofieldia glutinosa			
	Triglochin maritimum			
	Triglochin palustre			

End of Narrative Rating. Begin Quantitative Rating on next page.

Site: FirstEnergy, Brook Park Ford Plant	Rater(s): Erin Van Nort	Date: 2025-07-25

Metric 1. Wetland Area (size).

1 (max 6 pts.) | 1 (subtotal)

Select one size class and assign score.

- [ ] >50 acres (>20.2ha) (6 pts)
- [ ] 25 to <50 acres (10.1 to <20.2ha) (5 pts)
- [ ] 10 to <25 acres (4 to <10.1ha) (4 pts)
- [ ] 3 to <10 acres (1.2 to <4ha) (3 pts)
- [ ] 0.3 to <3 acres (0.12 to <1.2ha) (2pts)
- [x] 0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
- [ ] <0.1 acres (0.04ha) (0 pts)

Metric 2. Upland buffers and surrounding land use.

1 (max 14 pts.) | 2 (subtotal)

2a. Calculate average buffer width. Select only one and assign score. Do not double check.

- [ ] WIDE. Buffers average 50m (164ft) or more around wetland perimeter (7)
- [ ] MEDIUM. Buffers average 25m to <50m (82 to <164ft) around wetland perimeter (4)
- [ ] NARROW. Buffers average 10m to <25m (32ft to <82ft) around wetland perimeter (1)
- [x] VERY NARROW. Buffers average <10m (<32ft) around wetland perimeter (0)

2b. Intensity of surrounding land use. Select one or double check and average.

- [ ] VERY LOW. 2nd growth or older forest, prairie, savannah, wildlife area, etc. (7)
- [ ] LOW. Old field (>10 years), shrub land, young second growth forest. (5)
- [ ] MODERATELY HIGH. Residential, fenced pasture, park, conservation tillage, new fallow field. (3)
- [x] HIGH. Urban, industrial, open pasture, row cropping, mining, construction. (1)

Metric 3. Hydrology.

9 (max 30 pts.) | 11 (subtotal)

3a. Sources of Water. Score all that apply.

- [ ] High pH groundwater (5)
- [ ] Other groundwater (3)
- [x] Precipitation (1)
- [ ] Seasonal/Intermittent surface water (3)
- [ ] Perennial surface water (lake or stream) (5)

3b. Connectivity. Score all that apply.

- [ ] 100 year floodplain (1)
- [ ] Between stream/lake and other human use (1)
- [x] Part of wetland/upland (e.g. forest), complex (1)
- [ ] Part of riparian or upland corridor (1)

3c. Maximum water depth. Select only one and assign score.

- [ ] >0.7 m (>27.6 in) (3)
- [ ] 0.4 to 0.7 m (15.7 to 27.6 in) (2)
- [x] <0.4 m (<15.7 in) (1)

3d. Duration inundation/saturation. Score one or dbl check.

- [ ] Semi- to permanently inundated/saturated (4)
- [x] Regularly inundated/saturated (3)
- [ ] Seasonally inundated (2)
- [ ] Seasonally saturated in upper 30cm (12in) (1)

3e. Modifications to natural hydrologic regime. Score one or double check and average.

- [ ] None or none apparent (12)
- [ ] Recovered (7)
- [x] Recovering (3)
- [ ] Recent or no recovery (1)

Check all disturbances observed

[ ]	ditch	[ ]	point source (nonstormwater)
[ ]	tile	[x]	filling/grading
[ ]	dike	[x]	road bed/RR track
[ ]	weir	[ ]	dredging
[x]	stormwater input	[ ]	other

Metric 4. Habitat Alteration and Development.

6 (max 20 pts.) | 17 (subtotal)

4a. Substrate disturbance. Score one or double check and average.

- [ ] None or none apparent (4)
- [ ] Recovered (3)
- [x] Recovering (2)
- [ ] Recent or no recovery (1)

4b. Habitat development. Select only one and assign score.

- [ ] Excellent (7)
- [ ] Very good (6)
- [ ] Good (5)
- [ ] Moderately good (4)
- [ ] Fair (3)
- [ ] Poor to fair (2)
- [x] Poor (1)

4c. Habitat alteration. Score one or double check and average.

- [ ] None or none apparent (9)
- [ ] Recovered (6)
- [x] Recovering (3)
- [ ] Recent or no recovery (1)

Check all disturbances observed

[x]	mowing	[ ]	shrub/sapling removal
[ ]	grazing	[ ]	herbaceous/aquatic bed removal
[ ]	clearcutting	[x]	sedimentation
[ ]	selective cutting	[ ]	dredging
[ ]	woody debris removal	[ ]	farming
[ ]	toxic pollutants	[ ]	nutrient enrichment

17 subtotal this page

Site: FirstEnergy, Brook Park Ford Plant	Rater(s): Erin Van Nort	Date: 2025-07-25

17
subtotal first page

Metric 5. Special Wetlands.

0 max 10 pts. | 17 subtotal

Check all that apply and score as indicated.

- [ ] Bog (10)
- [ ] Fen (10)
- [ ] Old growth forest (10)
- [ ] Mature forested wetland (5)
- [ ] Lake Erie coastal/tributary wetland-unrestricted hydrology (10)
- [ ] Lake Erie coastal/tributary wetland-restricted hydrology (5)
- [ ] Lake Plain Sand Prairies (Oak Openings) (10)
- [ ] Relict Wet Prairies (10)
- [ ] Known occurrence state/federal threatened or endangered species (10)
- [ ] Significant migratory songbird/water fowl habitat or usage (10)
- [ ] Category 1 Wetland. See Question 1 Qualitative Rating (-10)

Metric 6. Plant communities, interspersion, microtopography.

-4 max 20 pts. | 13 subtotal

6a. Wetland Vegetation Communities.
Score all present using 0 to 3 scale.

- [ ] Aquatic Bed
- [1] Emergent
- [ ] Shrub
- [ ] Forest
- [ ] Mudflats
- [ ] Open water
- [ ] Other _____

6b. horizontal (plan view) Interspersion.
Select only one.

- [ ] High (5)
- [ ] Moderately high (4)
- [ ] Moderate (3)
- [ ] Moderately low (2)
- [ ] Low (1)
- [x] None (0)

Invasive Species Present:
narrow-leaved cattail
phragmites
purple loosestrife

6c. Coverage of invasive plants. Refer to Table 1 ORAM long form for list. Add or deduct points for coverage

- [x] Extensive >75% cover (-5)
- [ ] Moderate 25-75% cover (-3)
- [ ] Sparse 5-25% cover (-1)
- [ ] Nearly absent <5% cover (0)
- [ ] Absent (1)

6d. Microtopography.
Score all present using 0 to 3 scale.

- [0] Vegetated hummucks/tussucks
- [0] Coarse woody debris >15cm (6in)
- [0] Standing dead >25cm (10in) dbh
- [0] Amphibian breeding pools

Vegetation Community Cover Scale

0	Absent or comprises <0.1ha (0.2471 acres) contiguous area
1	Present and either comprises small part of wetland's vegetation and is of moderate quality, or comprises a significant part but is of low quality
2	Present and either comprises significant part of wetland's vegetation and is of moderate quality or comprises a small part and is of high quality
3	Present and comprises significant part, or more, of wetland's vegetation and is of high quality

Narrative Description of Vegetation Quality

low	Low spp diversity and/or predominance of nonnative or disturbance tolerant native species
mod	Native spp are dominant component of the vegetation, although nonnative and/or disturbance tolerant native spp can also be present, and species diversity moderate to moderately high, but generally w/o presence of rare threatened or endangered spp
high	A predominance of native species, with nonnative spp and/or disturbance tolerant native spp absent or virtually absent, and high spp diversity and often, but not always, the presence of rare, threatened, or endangered spp

Mudflat and Open Water Class Quality

0	Absent <0.1ha (0.247 acres)
1	Low 0.1 to <1ha (0.247 to 2.47 acres)
2	Moderate 1 to <4ha (2.47 to 9.88 acres)
3	High 4ha (9.88 acres) or more

Microtopography Cover Scale

0	Absent
1	Present very small amounts or if more common of marginal quality
2	Present in moderate amounts, but not of highest quality or in small amounts of highest quality
3	Present in moderate or greater amounts and of highest quality

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CATEGORY 1

End of Quantitative Rating. Complete Categorization Worksheets.

ORAM Summary Worksheet

		circle answer or insert score	Result
Narrative Rating	Question 1 Critical Habitat	YES (NO)	If yes, Category 3.
	Question 2. Threatened or Endangered Species	YES (NO)	If yes, Category 3.
	Question 3. High Quality Natural Wetland	YES (NO)	If yes, Category 3.
	Question 4. Significant bird habitat	YES (NO)	If yes, Category 3.
	Question 5. Category 1 Wetlands	YES (NO)	If yes, Category 1.
	Question 6. Bogs	YES (NO)	If yes, Category 3.
	Question 7. Fens	YES (NO)	If yes, Category 3.
	Question 8a. Old Growth Forest	YES (NO)	If yes, Category 3.
	Question 8b. Mature Forested Wetland	YES (NO)	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9b. Lake Erie Wetlands - Restricted	YES (NO)	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9d. Lake Erie Wetlands – Unrestricted with native plants	YES NO	If yes, Category 3
	Question 9e. Lake Erie Wetlands - Unrestricted with invasive plants	YES NO	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 10. Oak Openings	YES (NO)	If yes, Category 3
	Question 11. Relict Wet Prairies	YES (NO)	If yes, evaluate for Category 3; may also be 1 or 2.
Quantitative Rating	Metric 1. Size	1	
	Metric 2. Buffers and surrounding land use	1	
	Metric 3. Hydrology	9	
	Metric 4. Habitat	6	
	Metric 5. Special Wetland Communities	0	
	Metric 6. Plant communities, interspersion, microtopography	-4	
	TOTAL SCORE	13	Category based on score breakpoints 1

Complete Wetland Categorization Worksheet.

Wetland Categorization Worksheet

Choices	Circle one		Evaluation of Categorization Result of ORAM
Did you answer "Yes" to any of the following questions: Narrative Rating Nos. 2, 3, 4, 6, 7, 8a, 9d, 10	YES Wetland is categorized as a Category 3 wetland	(NO)	Is quantitative rating score *less* than the Category 2 scoring threshold (*excluding* gray zone)? If yes, reevaluate the category of the wetland using the narrative criteria in OAC Rule 3745-1-54(C) and biological and/or functional assessments to determine if the wetland has been over-categorized by the ORAM
Did you answer "Yes" to any of the following questions: Narrative Rating Nos. 1, 8b, 9b, 9e, 11	YES Wetland should be evaluated for possible Category 3 status	(NO)	Evaluate the wetland using the 1) narrative criteria in OAC Rule 3745-1-54(C) and 2) the quantitative rating score. If the wetland is determined to be a Category 3 wetland using either of these, it should be categorized as a Category 3 wetland. Detailed biological and/or functional assessments may also be used to determine the wetland's category.
Did you answer "Yes" to Narrative Rating No. 5	YES Wetland is categorized as a Category 1 wetland	(NO)	Is quantitative rating score *greater* than the Category 2 scoring threshold *(including* any gray zone)? If yes, reevaluate the category of the wetland using the narrative criteria in OAC Rule 3745-1-54(C) and biological and/or functional assessments to determine if the wetland has been under-categorized by the ORAM
Does the quantitative score fall within the scoring range of a Category 1, 2, or 3 wetland?	(YES) Wetland is assigned to the appropriate category based on the scoring range	NO	If the score of the wetland is located within the scoring range for a particular category, the wetland should be assigned to that category. In all instances however, the narrative criteria described in OAC Rule 3745-1-54(C) can be used to clarify or change a categorization based on a quantitative score.
Does the quantitative score fall with the *"gray zone"* for Category 1 or 2 or Category 2 or 3 wetlands?	YES Wetland is assigned to the higher of the two categories or assigned to a category based on detailed assessments and the narrative criteria	(NO)	Rater has the option of assigning the wetland to the higher of the two categories or to assign a category based on the results of a nonrapid wetland assessment method, e.g. functional assessment, biological assessment, etc, and a consideration of the narrative criteria in OAC rule 3745-1-54(C).
Does the wetland otherwise exhibit *moderate OR superior* hydrologic OR habitat, OR recreational functions AND the wetland was *not* categorized as a Category 2 wetland (in the case of moderate functions) or a Category 3 wetland (in the case of superior functions) by this method?	YES Wetland was undercategorized by this method. A written justification for recategorization should be provided on Background Information Form	(NO) Wetland is assigned to category as determined by the ORAM.	A wetland may be undercategorized using this method, but still exhibit one or more superior functions, e.g. a wetland's biotic communities may be degraded by human activities, but the wetland may still exhibit superior hydrologic functions because of its type, landscape position, size, local or regional significance, etc. In this circumstance, the narrative criteria in OAC Rule 3745-1-54(C)(2) and (3) are controlling, and the under-categorization should be corrected. A written justification with supporting reasons or information for this determination should be provided.

Final Category

Choose one	(Category 1)	Category 2	Category 3

End of Ohio Rapid Assessment Method for Wetlands.