

**AMERICAN TRANSMISSION SYSTEMS,
INCORPORATED
A FIRSTENERGY COMPANY**

LETTER OF NOTIFICATION

**SANDUSKY SOUTH AND
138 kV TRANSMISSION LINE CONNECTIONS PROJECT**

OPSB CASE NO.: 26-0527-EL-BLN

April 27, 2026

**American Transmission Systems, Incorporated
341 White Pond Drive
Akron, OH 44320-1119**

**LETTER OF NOTIFICATION
SANDUSKY SOUTH SUBSTATION AND
138 kV TRANSMISSION LINE CONNECTIONS PROJECT
OPSB CASE No. 26-0527-EL-BLN:**

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 (“OPSB”) as a Letter of Notification application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name and Reference Number

Name: Sandusky South Substation and
138 kV Transmission Line Connections Project (“Project”)

Reference Number: 509 (New Departure Substation),
2088 (Ford-New Departure 138 kV Transmission Line),
3050 (Greenfield-New Departure 138 kV Transmission Line),
3054 (Greenfield-NASA 138 kV Transmission Line)

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

In this Project, American Transmission Systems, Incorporated (“ATSI”) and Ohio Edison, FirstEnergy companies (collectively, “Applicants”), propose to construct the new 345/138 kV Sandusky South Substation and connect existing associated transmission lines to the new substation to provide two 138 kV retail delivery points for a new data center customer, Aligned Data Centers NEO PropCo LLC (“Customer”). The construction of the Sandusky South Substation and associated transmission lines is a three-phase Project comprised of the following:

- Phase 1: Relay Setting Adjustments (no OPSB filing required);
- Phase 2: Construct entire footprint of the proposed 5.9-acre Sandusky South Substation and build the 138 kV yard, which includes a 9-breaker, breaker-and-

a-half and reconfiguration of 4 existing 138 kV transmission lines (the subject of this filing); and

- Phase 3: Construct the 345 kV 4-breaker ring bus within the footprint of the Sandusky South Substation, add additional 6 new 138 kV breakers, and connect an existing 345 kV transmission line (the subject of a future OPSB filing).

The proposed Sandusky South Substation will be constructed in the location of the existing New Departure Substation, which will be demolished when the 138 kV yard is placed in-service at the end of this project phase to make room for the future 345 kV yard.

Applicants will re-terminate the existing Ford-New Departure 138 kV, Greenfield-New Departure 138 kV transmission lines, and loop the Greenfield-NASA 138 kV Transmission Line into the new Sandusky South Substation. The four (4) new transmission line names will be the Greenfield-Sandusky South No. 1 138 kV, Greenfield-Sandusky South No. 2 138 kV, Ford-Sandusky South 138 kV, and NASA-Sandusky South 138 kV transmission lines.

To reconfigure the existing Ford-New Departure 138 kV, Greenfield-New Departure 138 kV transmission lines, and loop the Greenfield-NASA 138 kV Transmission Line into the new Sandusky South Substation, Applicants will install fifteen (15) steel monopoles on concrete foundations and remove eight (8) existing structures: two (2) existing lattice towers (No. 1313 and No. 1314) and six (6) existing wood poles (Nos. 4595 through 4600).

To complete this phase of the Project, two (2) 138 kV feeds will be extended by Ohio Edison from the proposed Sandusky South Substation to the Customer-owned Perkins Substation.

The Project is in Perkins Township, Erie County, Ohio. The general location of the proposed Project is shown in **Exhibit 1**, a partial copy of a United States Geologic Survey Erie County, Ohio Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery of the Project Area. The general layout is shown in **Exhibit 3**.

4906-6-05 (B)(1): Letter of Notification Requirement

The Project meets the requirements for a Letter of Notification application because the Project is within the types of projects defined by Items (1)(d)(i) and (3) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm.Code 4906-1-01. These items state:

(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.

(3) Constructing a new electric power transmission substation.

The proposed Project involves construction of a new electric power transmission substation and reconfigurations of four existing transmission lines completely on the property of the customer.

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

The Project is needed to provide two 138 kV retail delivery points to the Customer. The Customer requested the proposed delivery points for electric service for a new data center with a proposed load addition of approximately 155 MVA. This Project is part of a larger project/initiative and is considered “Phase 2” out of a total of three phases, as described above.

The proposed Project will serve up to 155 MVA of load by building the Sandusky South 138 kV Substation as a nine-breaker (future 15-breaker), breaker-and-a-half substation. The Greenfield – NASA 138 kV Transmission Line will be cut and looped in and out of the Sandusky South Substation. The existing 138 kV transmission lines from Ford Substation and Greenfield Substation will be re-terminated into the Sandusky South Substation. The

Substation to the point of interconnections (“POI”) with the Customer. All work mentioned above is collectively the “direct connection facilities.” The Project will be designed in accordance with the FirstEnergy (“FE”) “Requirements for Transmission Connected Facilities” document¹.

With the proposed 138 kV load addition, Applicants considered and incorporated the use of advanced technologies such as Advanced Conductors 795 kcmil 26/7 ACSS. ACSS provides higher operating temperature capabilities and lower sag characteristics. The higher temperature / lower sag (“HTLS”) conductor allows for higher ampacity through the conductor and provides more flexibility in terms of alleviating overloading, preventing premature degradation and accommodating additional load, if or when needed.

The need for the proposed Project was presented at the July 9, 2024, Transmission Expansion Advisory Committee (“TEAC”). The solution for the proposed Project was presented at the September 13, 2024, TEAC and the solution presentation slides are included as **Exhibit 4**.

Applicants and PJM Transmission Planning evaluated the proposed load addition and did not identify any PJM Planning Criteria violations attributable to the load addition. Therefore, no transmission system upgrades are required as a result of the proposed load addition, other than the required direct connection facilities necessary to provide electric service to the Customer. PJM assigned the Project supplemental upgrade identification number s3660.2.

4609-6-05 (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 PUCO in Case No. 25-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The

¹ <https://firstenergycorp.com/content/dam/feconnect/files/wholesale/Requirements-for-Transmission-Connected-Facilities.pdf>

map is incorporated by reference only. The Project is included on page 71 ATSI's LTFR filed in 2025. The general location and layout of the Project area is shown in **Exhibits 1 and 2**.

4609-6-05 (B)(4): Alternatives Considered

Due to the nature of the Project and the specific customer need, there are no reasonable or practical alternatives to the proposed Project. No alternatives were considered for this Project as there were no other viable transmission solutions. The proposed Project offers the most direct and economical solution with the least environmental impacts, for a transmission connection to the Customer's Substation.

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

Applicants' manager of External Affairs will advise local officials of features and the status of the proposed Project as necessary. Applicants will maintain a Project website and will continue to work with interested stakeholders concerning the proposed Project. The website address is below:

https://www.firstenergycorp.com/about/transmission_projects/ohio.html .

Applicants will publish notice of the Project in The Sandusky Register within 7 days of filing this Letter of Notification application. The notice will comply with Adm.Code 4906-6-08(A)(1)-(6).

During all phases of this Project, Applicants will maintain the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com where the public may ask questions or leave comments on the Project for Applicants.

4609-6-05 (B)(6): Construction Schedule

The construction for this Project is expected to begin as early as August 1, 2026, and be completed by December 31, 2027.

4609-6-05 (B)(7): Area Map

Exhibit 1 depicts the general location of the Project. This Exhibit provides a partial copy of the United States Geologic Survey, Erie County OH, Quad Map. **Exhibit 2** is a copy of ESRI aerial imagery of the Project area.

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

The Project is located on the existing and new right-of-way (“ROW”) within property (Parcel No. 32-01325.000) owned by Aligned Data Centers NEO Propco, LLC, the Customer. Aligned Data Centers NEO Propco, LLC, will grant the Companies an easement for the transmission facilities across its property.

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

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

The transmission line construction will have the following characteristics:

Voltage:	138 kV
Conductors:	795 kcmil 26/7 ACSS
Static Wire:	7#8 Alumoweld/SFPOC SFSJ-J-11433 96-count OPGW
Insulators:	Porcelain/Glass
ROW Width:	170’
Structure Type:	Exhibit 5 -Single Circuit 138 kV Tangent Steel Monopole Structure on Concrete Foundation (Qty. 1) Exhibit 6 -Double Circuit 138 kV Tangent Steel Monopole Structure on Concrete Foundation (Qty. 2) Exhibit 7 -Double Circuit 138 kV DE Steel Monopole Structure on Concrete Foundation (Qty. 12)

The equipment and facilities described below will be located within the fenced area of the proposed Project once construction is complete.

Materials:

PCE:	Qty. 1 – 58’x28’ PCE with 1 lot of relaying and controls, RTU and HMI
Circuit Breakers:	Qty. 9 – 138 kV
CCVTs:	Qty. 24 – 138 kV 700/1200 ratios,
Motor Operated Disconnect Switch:	Qty. 6 – 138 kV, 2000 A, with arcing horns
Manual Operated Disconnect Switch:	Qty. 18 – 138 kV, 2000 A with arcing horns

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

There are no occupied residences or institutions within 100 feet from the proposed transmission line centerline and therefore no Electric and Magnetic Field (“EMF”) calculations are required by this subsection.

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

The estimated cost for the proposed Project is \$30,127,000. These costs will be allocated between ATSI, Ohio Edison, and the Customer. Although not statutorily required for approval, at the request of OPSB Staff, the estimated cost is a Class 4 estimate and Applicants confirm that ATSI’s costs will be captured and allocated via FERC formula rates for the ATSI Transmission Zone, Attachment H-21 in the PJM OATT.

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

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

The Project is in Perkins Township, Erie County, Ohio. The main land use around the Project area is commercial and industrial. No significant changes or impacts to the current or future land use are anticipated as a result of this Project.

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

Agricultural land does not exist within the Project’s Area of Potential Effect (“APE”).

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

As part of the investigation for this Letter of Notification application, TRC Companies, Inc. (“TRC”) requested database information from the Ohio Historic Preservation Office’s (“SHPO”) on December 2, 2025, for the Project Study Area (Area of Potential Effects or “APE”) with a one (1)-mile search radius. On December 31, 2025, SHPO replied to the request and the response is attached as **Exhibit 8**. SHPO concurred that the Project, as proposed, will not affect any historic properties or cultural resources, and no cultural resource studies are warranted. 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.

The Project Study Area, which initially measured 20.68 acres (ac) in size, was later divided into two (2) sections and increased to 28.81 acres in size. Subsequently, additional areas were added to the Study Area on April 14, 2026, to support the proposed substation expansion. The added areas increased the Study Area by an additional 1.20 acres, now totaling 30.01 acres.

On March 23, 2026, a follow up letter was submitted to SHPO due to a change in the Project Study Area. Additional areas to support the substation expansion were submitted to SHPO on April 14, 2026, via email. A reply from SHPO indicated the additional area to support the substation expansion would be added to the March 23, 2026, submission. SHPO’s response received April 21, 2026, and included as part of **Exhibit 8**, indicates that there will be no effect on historic resources as a result of the Project.

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. The results of the search identified ten (10) NRHP-listed historic properties, as well as two (2) Determinations of Eligibility (“DOE”) recorded within one (1)-mi of the proposed Project. Table 1 below contains a list of the NRHP-listed and eligible resources, as well as their associated distances from the Study Area.

Table 1: NRHP Listed and Eligible Resources Within One (1)-Mi.

Ref. No.	Resource Name	NRHP Status	Distance	Direction
82001428	No. 5 Fire Sation	Listed	0.83	North
82001374	Barker School	Listed	0.83	North
82001414	Kerber’s Marine Grocery	Listed	0.88	North
82001431	Osborne School	Listed	0.68	Northeast
82001391	Curtis, William D. House	Listed	0.91	Northeast
82001427	Murschel House	Listed	0.55	Northeast
75001389	Lake Shore and Michigan Southern Railroad Depot	Listed	0.54	Northeast
82001416	Kuebeler, August House	Listed	0.77	North
82001396	Erie County Oil Products Co.	Listed	0.92	North
87000639	Doerzbach, George J., House	Listed	0.92	Northeast
2024ER162581	MacArthur Park	DOE	0.15	North
2019ER143918	Unknown	DOE	0.97	Northeast

The SHPO 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. The search identified one (1) historic bridge, 227 above-ground historic resources, and three (3) OGS cemeteries recorded within one (1)-mi of the Study Area.

In addition, there is one (1) previously completed archaeological survey recorded within one (1)-mi of the proposed Project. There are two (2) previously recorded pre-contact isolated finds mapped 0.26 mi and 0.36 mi southwest of the Study Area. Both sites are within the previously surveyed areas.

The Project Study Area consists of existing, maintained utility ROW and is situated within industrial, agricultural, and scrub/shrub landscapes. Currently, as proposed, no new 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. To date, TRC has not conducted any on-site cultural resources surveys.

4906-6-05 (B)(10)(d): Local, State, and Federal Requirements

Coordination with Perkins Township to obtain a ROW permit for work along West Perkins Avenue may be required, 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). A Storm Water Pollution Prevention Plan (“SWPPP”) submittal to the Erie County Engineer’s Office and Erie County Soil & Water Conservation District (“SWCD”) will be required for over 1,000 square feet of earth disturbance. Portions of the proposed Project scope are located within a 100-year FEMA floodplain. Coordination with the Erie County Building Department will be required to obtain any required local floodplain development permits. 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 potential government agency requirements is provided in Table 2 below.

Table 2. List of Government Agency Requirements

Agency	Requirement
Ohio EPA	General NPDES Construction Storm Water Permit OHC000006; NOI (if >1 acre disturbance)
Erie County Engineer’s Office and Erie County Soil & Water Conservation District	SWPPP review; local construction stormwater/erosion control compliance
Erie County Building Department	Floodplain development permit/coordination (as applicable)
Perkins Township	ROW Permit

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

As part of the investigation, TRC conducted the necessary environmental 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 Study Area. The ODNR’s Office of Real Estate’s response dated November 21, 2025, indicated that there are no records of state and/or federally listed plants, animals, and communities located within a one-mile radius of the Project area. However, the Project is within the range of nineteen (19) state and/or federally listed animal species. A copy of ODNR’s Office of Real Estate’s response is included as **Exhibit 9**. A list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in **Table 3**.

Table 3. List of Endangered and Threatened Species within range of Project Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Birds				
Northern harrier	<i>Circus hudsonius</i>	N/A	Endangered	Marshes and grasslands.
Sandhill crane	<i>Antigone canadensis</i>	N/A	Threatened	Grassland, prairie, or large tracts of wetland habitat.
Mammals				
Indiana bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Little brown bat	<i>Myotis lucifugus</i>	N/A	Endangered	Trees, forests, caves, and caverns.
Northern long-eared bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Endangered	Trees, forests, caves, and caverns.
Fish				
Bigeye shiner	<i>Notropis boops</i>	N/A	Endangered	Perennial streams.
Brook trout	<i>Salvelinus fontinalis</i>	N/A	Endangered	Perennial streams.
Channel darter	<i>Percina copelandi</i>	N/A	Threatened	Perennial streams.
Lake sturgeon	<i>Acipenser fulvescens</i>	N/A	Endangered	Perennial streams.
Longnose sucker	<i>Catostomus catostomus</i>	N/A	Endangered	Perennial streams.
Pugnose minnow	<i>Opsopoeodus emiliae</i>	N/A	Endangered	Perennial streams.
Western banded killifish	<i>Fundulus diaphanus menona</i>	N/A	Endangered	Perennial streams.
Mussels				
Eastern pondmussel	<i>Ligumia nasuta</i>	N/A	Threatened	Perennial streams.
Reptiles				
Blanding's turtle	<i>Emydoidea blandingii</i>	N/A	Threatened	Marshes, ponds, lakes, streams, wet meadows, and swampy forests.
Eastern massasauga	<i>Sistrurus catenatus</i>	Threatened	Endangered	Wet prairies, fens, and other wetlands, as well as drier upland habitat.
Kirtland's snake	<i>Clonophis kirtlandii</i>	N/A	Threatened	Wet fields and meadows.
Smooth greensnake	<i>Opheodrys vernalis</i>	N/A	Endangered	Prairies, marshy meadows, and roadside ditches.
Spotted turtle	<i>Clemmys guttata</i>	N/A	Threatened	Fens, bogs and marshes, wet prairies, meadows, pond edges,

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
				wet woods, and the shallow sluggish waters of small streams and ditches.

The response from ODNR, DOW indicated the Project is within the range of the federally and state endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*), the state endangered little brown bat (*Myotis lucifugus*) and tricolored bat (*Perimyotis subflavus*). 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 trees. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed and submitted to ODNR for concurrence. ODNR responded on December 1, 2025, **Exhibit 9A**, concurring that no caves, cliffs, or mine openings occur in the Project Area. Therefore, the Project is not likely to impact hibernating bats. No tree cutting or subsurface impacts to a hibernaculum are proposed; therefore, this Project is not likely to impact these species.

The Project is within the range of the eastern pondmussel (*Ligumia nasuta*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this Project will not impact this species.

The Project is within the range of one (1) state threatened fish and six (6) state endangered fish, which are listed above in Table 3. Due to the location, and that there is no in-water work proposed in a perennial stream, this Project will not impact these species.

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

The Project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. Due to the location, the type of habitat within the Project Study 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 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 and the type of work proposed, this Project is not likely to impact this species.

The Project is within the range of the northern harrier (*Circus hudsonius*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. Due to the maintained nature of the existing ROW and that no large marshes will be impacted during construction activities, this Project is not likely to impact this species.

The Project is within the range of the sandhill crane (*Antigone canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract

of wet meadow, shallow marsh, or bog for nesting. Large tracts of wetlands will not be impacted by the proposed Project activities; therefore, no impacts are anticipated to this species.

In addition, 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 November 19, 2025, is included as **Exhibit 10**. The response indicated that due to the Project type, size, location, and the proposed implementation of seasonal tree cutting (clearing of trees ≥ 3 inches diameter at breast height between October 1 and March 31) to avoid impacts to the Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), and tricolored bat (*Perimyotis subflavus*), USFWS does not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat.

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

TRC and EMH&T conducted wetland and stream delineation for the Project on the parcels making up the total Project Study Area. The Project Study Area is a total of 30.01 acres, located within Perkins Township, Erie County, Ohio. TRC conducted a surface water delineation for 8.46 acres of the western portion of the Project Study Area on January 13, 2026. TRC identified three (3) wetlands and one (1) stream within this extent of the Project Study Area and are included in the Surface Water Delineation Report in **Exhibit 11**.

The LOD will be completely within the Project Study Area and will predominantly include access through the existing, maintained utility ROW. NWP 57 (effective March 15, 2026, and expiring on March 15, 2031), authorizes the construction of access roads for the construction and maintenance of electric utility lines or telecommunication lines, including overhead lines and substations, in nontidal waters of the United States, provided the activity does not cause the loss of greater than 0.5-acre of waters of the United States. Nationwide Permit Regional General Conditions were reviewed regarding this Project. This Project is in Perkins Township, Erie County, Ohio, which is within the USACE Buffalo Regulatory

District. The Project location is not listed in Appendix 1 to Regional General Condition 5(a) (Endangered Species and Threatened Species). However, Aligned Adaptive Data Centers will be coordinating any permitting required for impacts to isolated Wetland 1/4 within the remaining 21.55 acres of the Project Study Area.

A review of the USGS Protected Areas Database (www.usgs.gov/programs/gap-analysis-project/science/protected-areas) (Version 4.1, March 2025) revealed no conservation easements within the Project Study Area. The National Conservation Easement Database is no longer used; this is due to the National Conservation Easement Database no longer being actively updated and supported.

4906-6-05 (B)(10)(g): Additional 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 Public Utilities Commission of Ohio (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 Letter of Notification Transmittal and Availability for Public Review

This Letter of Notification application is being provided concurrently to the following officials in Perkins Township and Erie County, Ohio.

Erie County

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Per Adm.Code 4906-6-07(B), exemplar copies of the notice letters sent to local government officials and to the library have been included with this application as proof of compliance with requirements of Adm.Code 4906-6-07(A)(1) and 4906-6-07(A)(2).

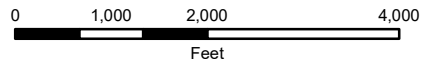
Information is posted at www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Letter of Notification application. The link to this website is being provided in accordance with Adm.Code 4906-6-07(B), which requires Applicants to provide the OPSB with proof of compliance with Adm.Code 4906-6-07(A)(3).



PERKINS TOWNSHIP
ERIE COUNTY
OHIO

LEGEND:

Project Location



Reference:

USGS Topographical Overlay; ODOT

Coordinate System:

NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US



EXHIBIT 1

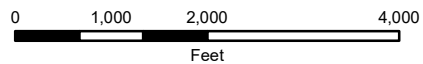
**Sandusky South Substation and
138 kV Transmission Line Connections
Project**



PERKINS TOWNSHIP
ERIE COUNTY
OHIO

LEGEND:

Project Location



Reference:

ESTI Imagery; ODOT

Coordinate System:

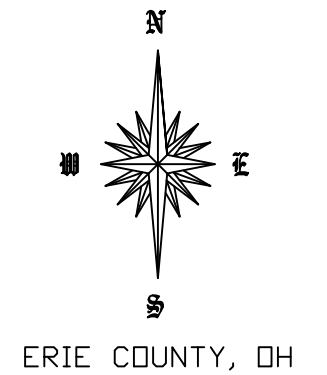
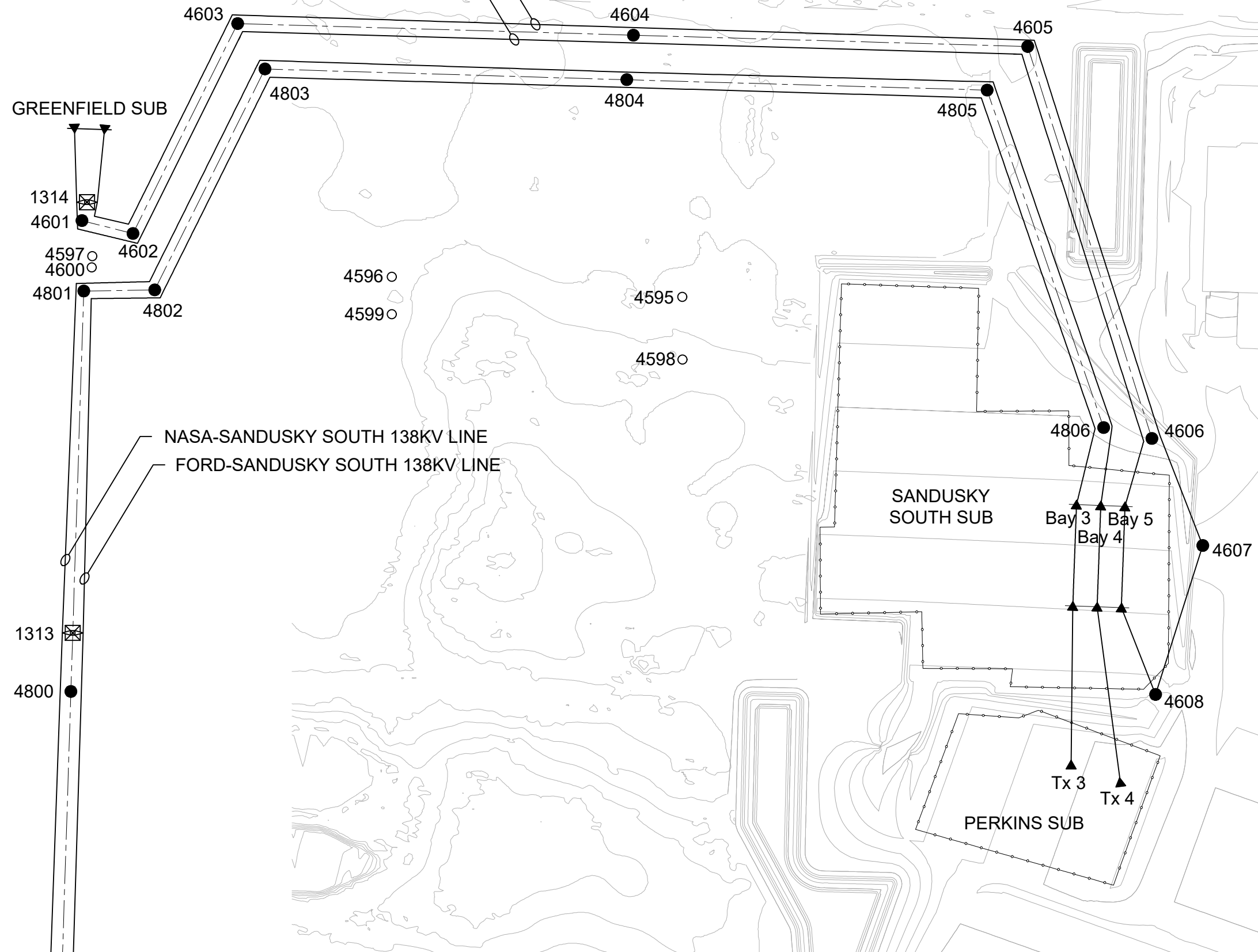
NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US



EXHIBIT 2

**Sandusky South Substation and
138 kV Transmission Line Connections
Project**

GREENFIELD-SANDUSKY SOUTH NO 1 138KV LINE
 GREENFIELD-SANDUSKY SOUTH NO 2 138KV LINE



LEGEND

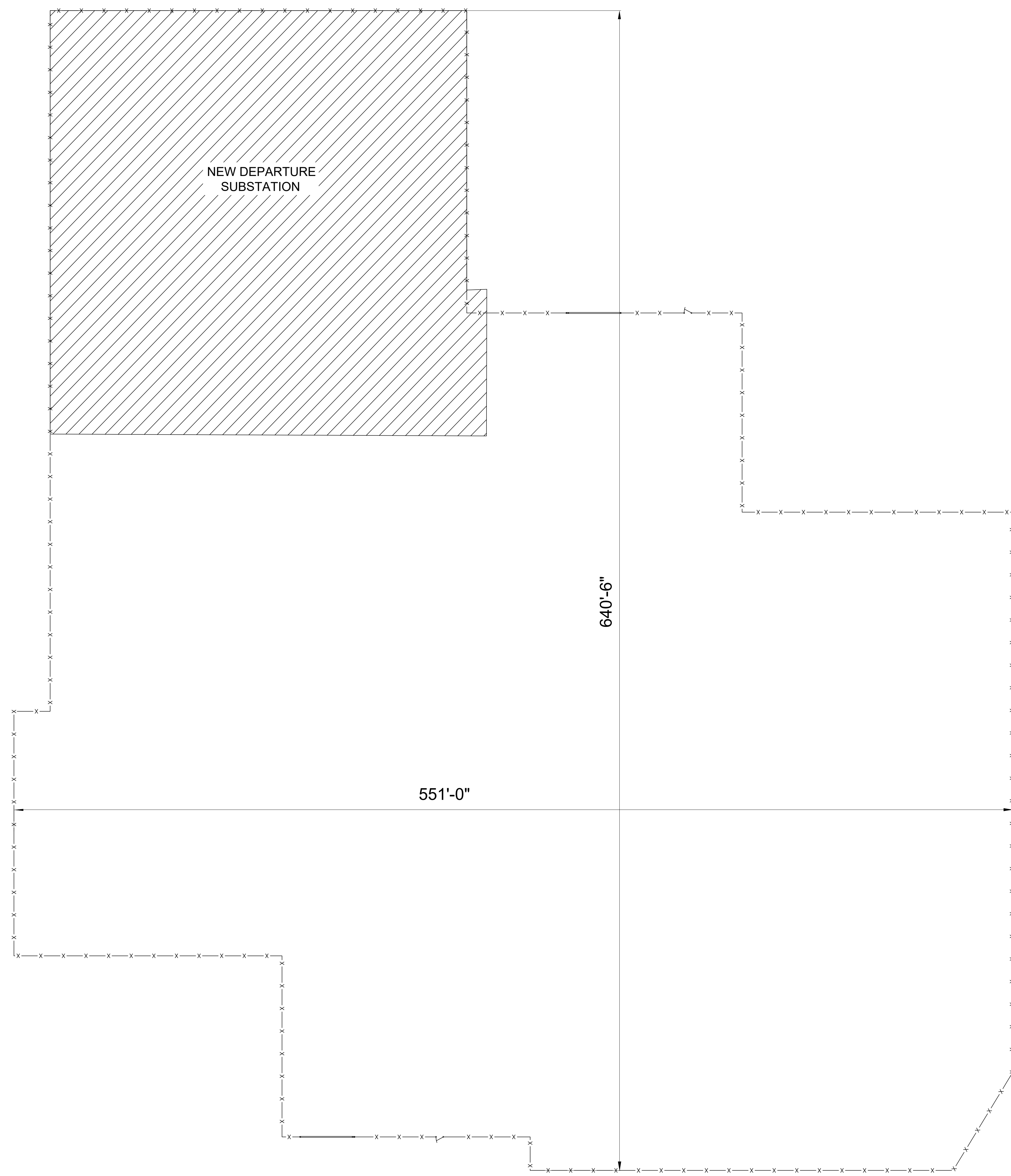
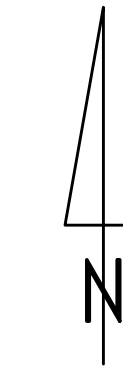
- TRANSMISSION CONDUCTOR
- TRANSMISSION CENTERLINE
- SUBSTATION FENCELINE
- ▲ --- SUBSTATION ATTACHMENT POINT
- --- EXISTING WOOD POLE TO BE REMOVED
- --- PROPOSED NEW STRUCTURE LOCATION
- ⊠ --- EXISTING LATTICE TOWER TO BE REMOVED



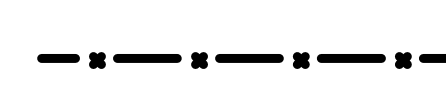

SANDUSKY SOUTH SUBSTATION
 AND 138 kV TRANSMISSION LINE
 CONNECTIONS PROJECT

GENERAL LAYOUT

EXHIBIT 3



LEGEND:

-  PROPOSED FENCE LINE
-  EXISTING SUBSTATION TO BE DEMOLISHED



SANDUSKY SOUTH SUBSTATION
AND 138 kV TRANSMISSION LINE CONNECTIONS PROJECT

SUBSTATION GENERAL LAYOUT

EXHIBIT 3

Need Number: ATSI-2024-056
Process Stage: Solution Meeting – 09/10/2024
Previously Presented: Need Meeting – 07/19/2024

Supplemental Project Driver(s):
Customer Service

Specific Assumption Reference(s):
 New customer connection request will be evaluated per FirstEnergy’s “Requirements for Transmission Connected Facilities” document and “Transmission Planning Criteria” document.

Problem Statement
 New Customer Connection – Customer has requested a new 345 kV delivery point near the New Departure area. The anticipated load of the new customer connection is 540 MVA.

Forecasted In-Service Date:
 November 28, 2029



Need Number: ATSI-2024-056
Process Stage: Solution Meeting – 09/10/2024

Proposed Solution:
Phase 1: 138 kV Direct Connection to New Departure
 ■ Adjust relay settings at New Departure Substation

Estimated Project Cost: \$0.1 M
Projected In-Service: 3/1/2025
Status: Engineering
Model: 2023 RTEP model for the 2028 Summer (50/50)

Phase 1: 138 kV Direct Connection to New Departure

New Departure



Customer

Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	

ATSI Transmission Zone M-3 Process New Departure 345 kV Customer Connection

Need Number: ATSI-2024-056
Process Stage: Solution Meeting 09/10/2024

Proposed Solution:

Phase 2: 138 kV Switching Station

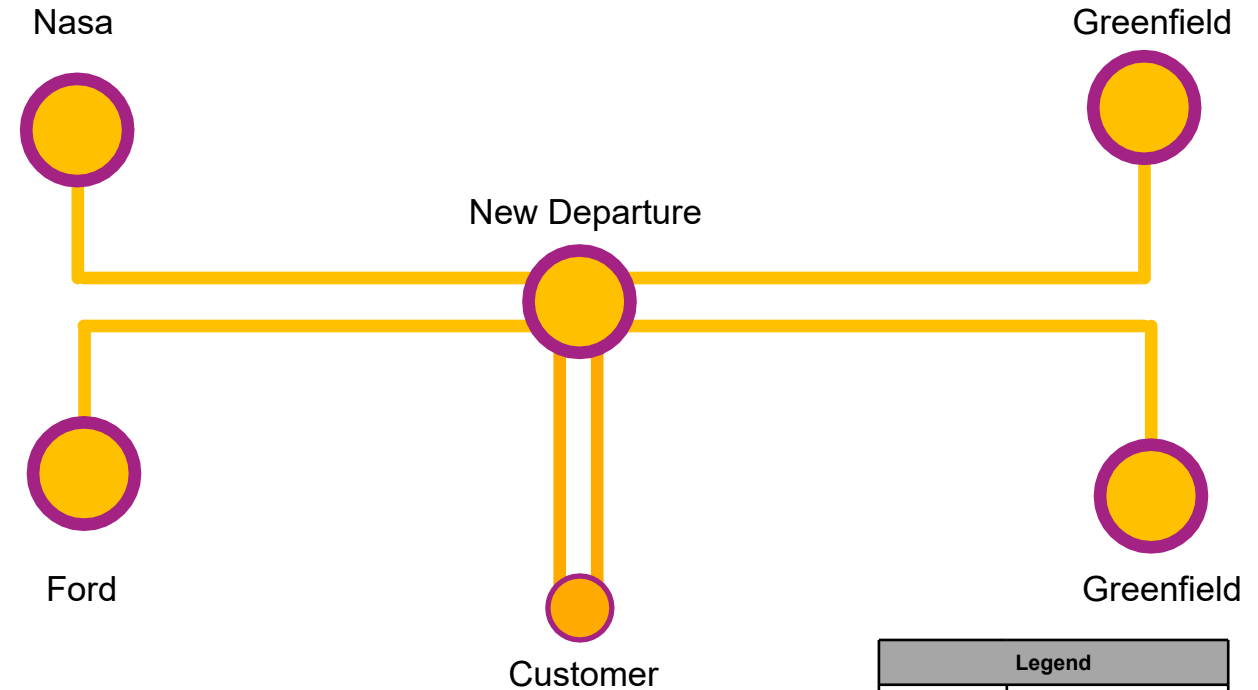
- Rebuild New Departure Substation as a new nine breaker, breaker-and-a-half, 138 kV switching station
- Re-terminate the lines from Ford Substation and Greenfield Substation into the New Departure Substation.
- Loop the Greenfield – Nasa 138 kV Line in and out of the new substation
- Install two sets of revenue metering equipment
- Upgrade relaying/adjust relay settings at Greenfield, Nasa and Ford substations

Alternatives:

- No reasonable alternatives to meet the customer’s request near New Departure Substation.

Estimated Project Cost: \$27M
Projected In-Service: 5/25/2028
Status: Engineering
Model: 2023 RTEP model for the 2028 Summer (50/50)

Phase 2: 138 kV Transmission Switching Station



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	

Need Number: ATSI-2024-056
Process Stage: Solution Meeting 09/10/2024

Proposed Solution:

Phase 3: 345 kV Switching Station

- Build a new four-breaker 345 kV ring bus at New Departure Substation.
- Add six new 138 kV breakers at New Departure Substation and install two 345/138 kV transformers.
- Loop the Davis Besse – Hayes 345 kV Line in and out of the new 345 kV ring bus by constructing two 345 kV lines, approximately 3.5 miles in length.
- Install two additional sets of revenue metering.
- Upgrade relaying/adjust relay settings at Davis Besse and Hayes substations

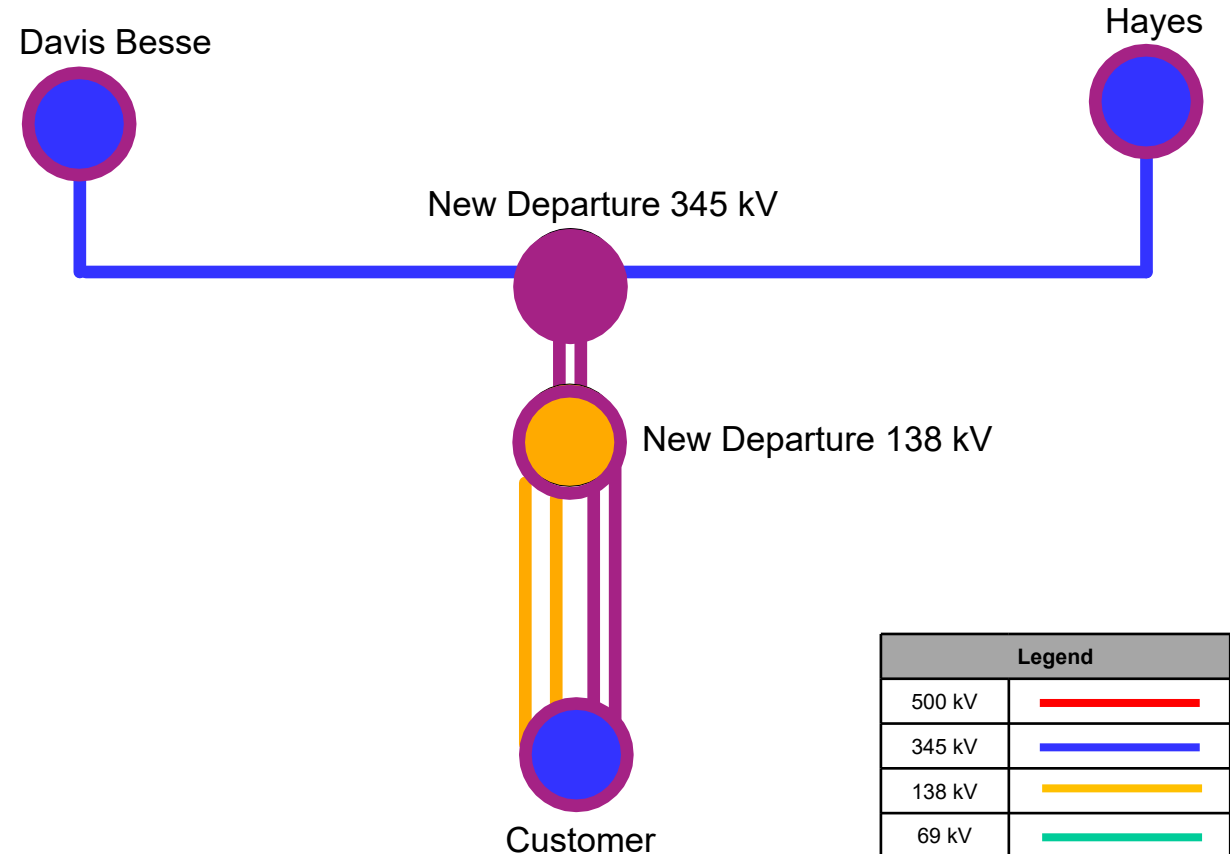
Alternatives:

- No reasonable alternatives to meet the customer’s request near New Departure Substation.

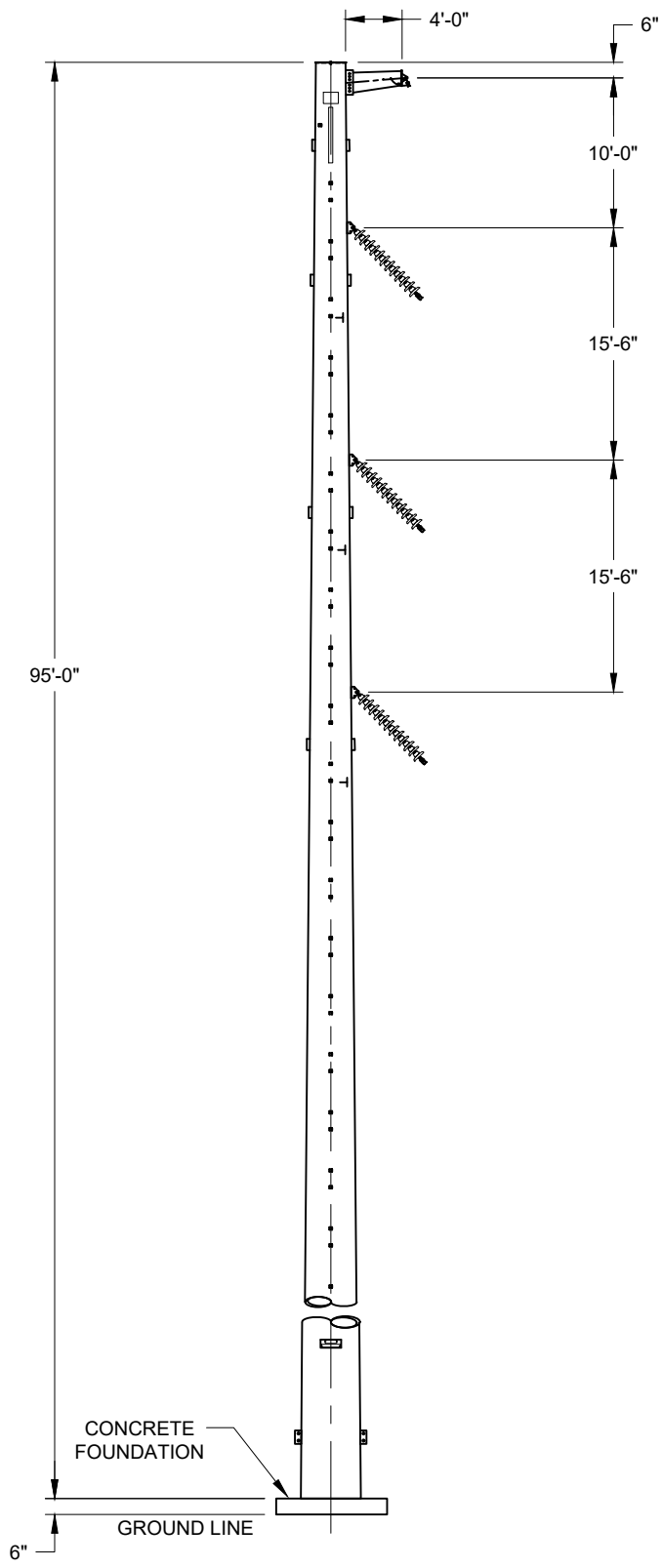
Estimated Project Cost: \$72M
Projected In-Service: 11/28/2029
Status: Engineering
Model: 2023 RTEP model for the 2028 Summer (50/50)

Total Estimated Project Cost: \$99.1 M (Phase 1, Phase 2, and Phase 3)

Phase 3: 345 kV Transmission Switching Station



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



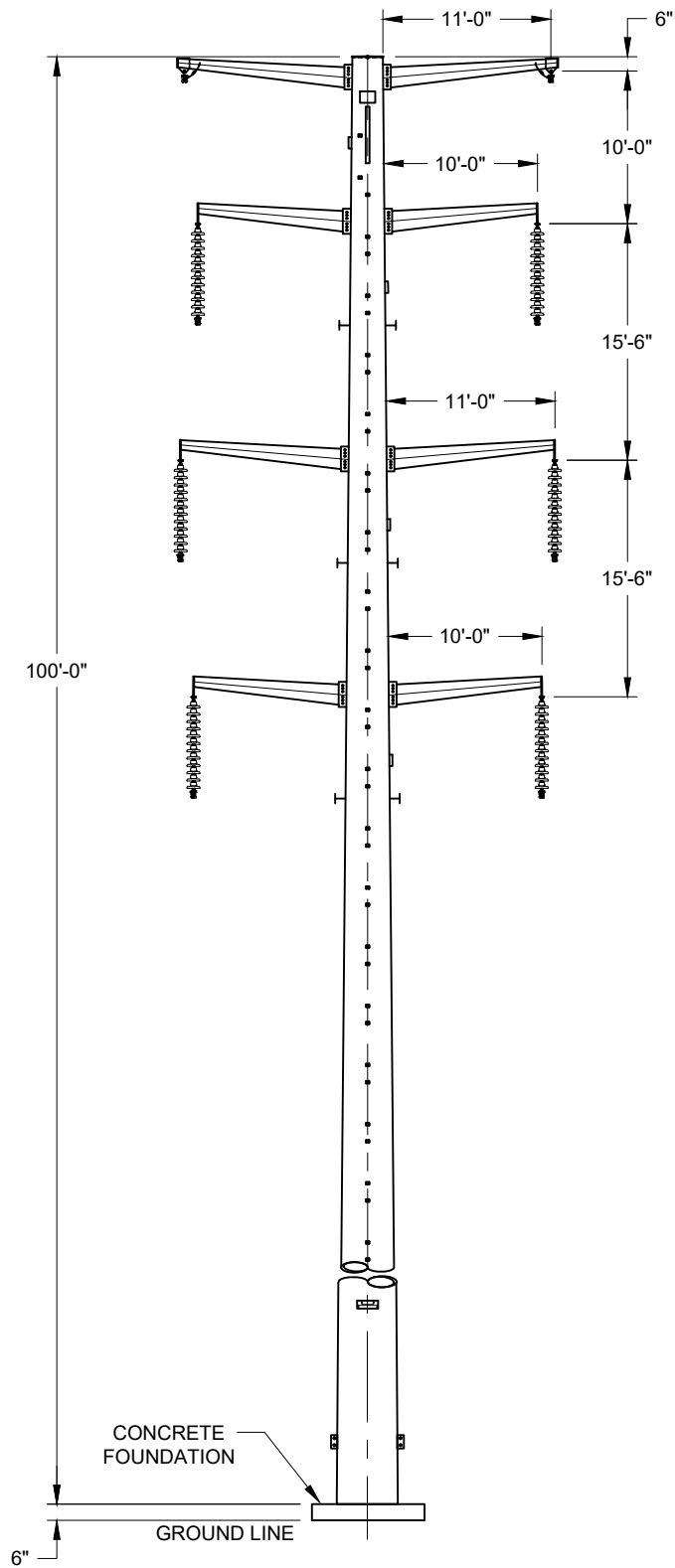
SCALE: NTS



SANDUSKY SOUTH SUBSTATION
AND 138 kV TRANSMISSION LINE
CONNECTIONS PROJECT

138 kV SINGLE CIRCUIT TANGENT STEEL MONOPOLE

EXHIBIT 5



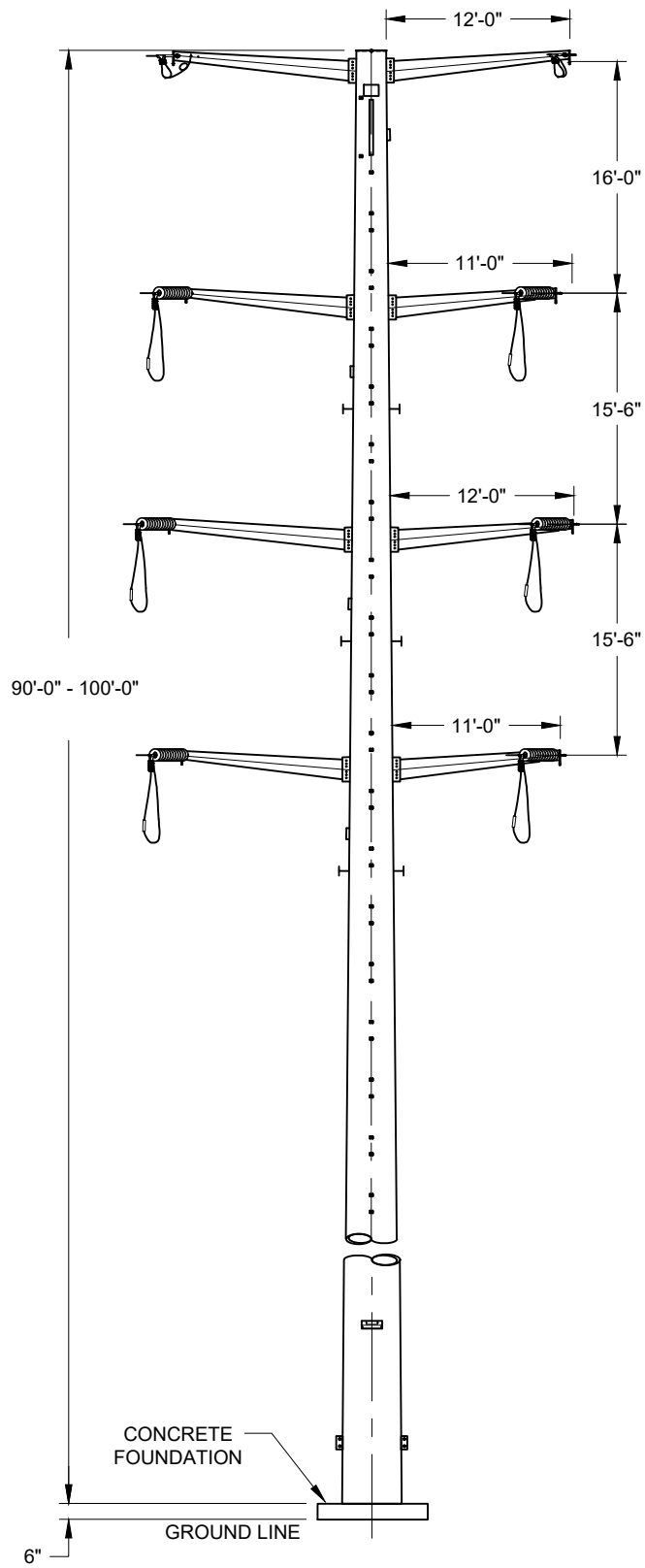
SCALE: NTS



SANDUSKY SOUTH SUBSTATION
AND 138 kV TRANSMISSION LINE
CONNECTIONS PROJECT

138 kV DOUBLE CIRCUIT TANGENT STEEL MONOPOLE

EXHIBIT 6



SCALE: NTS



SANDUSKY SOUTH SUBSTATION
AND 138 kV TRANSMISSION LINE
CONNECTIONS PROJECT

138 kV DOUBLE CIRCUIT DEADEND STEEL MONOPOLE

EXHIBIT 7



In reply refer to:
2025-ERI-67060

December 31, 2025

Justin McKissick, MA, RPA
Senior Archaeologist/Project Manager
TRC Environmental Corporation
317 E Carson Street, Suite 113
Pittsburgh, PA 15219
Email: JMcKissick@trccompanies.com

RE: Section 106 Review: Aligned Data Center Phase 2 Project, Perkins Township, Erie County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on December 2, 2025, regarding the above-referenced project in Erie 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 (O.R.C.) and the Ohio Power Siting Board rules for siting this project. The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The project will involve the construction of a line tap in support of the Aligned Data Center which is a separate undertaking. The Area of Potential Effect (APE) is defined as approximately 5,660 LF with varying width between 120-ft to 335-ft, for a total area of 20.68-acres. A review of our files indicates no historic properties, districts, previously recorded archaeological sites, or above-ground resources within or adjacent to the APE. While there are resources fifty years of age or older within the Study Area, the project will not create new visual impacts. Therefore, it is our opinion 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. In such a situation, this office should be contacted. If you have any questions concerning this review, please contact me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Stephen M. Biehl".

Stephen M. Biehl, Project Reviews Manager-Archaeology
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1111931



Office of Real Estate & Land Management

Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

November 21, 2025

Emma Given
TRC Companies, Inc.
1382 W 9th St, Suite 400
Cleveland, Ohio 44113

Re: 25-1636_Aligned Data Center Phase 2

Project: The proposed project involves the construction of a data center on a 20.68-acre site.

Location: The proposed project is located in Perkins Township, Erie 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 entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose,

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

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

The project is within the range of the eastern pondmussel (*Ligumia nasuta*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

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

State Endangered

brook trout (*Salvelinus fontinalis*)
longnose sucker (*Catostomus catostomus*)
lake sturgeon (*Acipenser fulvescens*)
pugnose minnow (*Opsopoeodus emiliae*)
bigeye shiner (*Notropis boops*)
western banded killifish (*Fundulus diaphanus menona*)

State Threatened

channel darter (*Percina copelandi*)

Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and federally threatened snake species. The eastern massasauga uses a range of habitats including wet

prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the 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 Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. 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.

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

The project is within the range of the sandhill crane (*Antigone canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

Due to the potential 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.*

From: Eileen.Wyza@dnr.ohio.gov
To: [Given, Emma](#)
Cc: [Molnar, Maggie](#); [Falkinburg, Brad](#)
Subject: RE: [EXTERNAL] 25-1636_TRC - Aligned Data Center Phase 2 - ODNR Comments
Date: Monday, December 1, 2025 2:13:45 PM
Attachments: [image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image001.png](#)

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Hello Emma,

Per review of the desktop survey provided for FirstEnergy's Aligned Data Center Phase 2 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

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Please consider the environment before printing this email.

From: Given, Emma <EGiven@trccompanies.com>
Sent: Monday, December 1, 2025 9:06 AM
To: Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>
Cc: Molnar, Maggie <MMolnar@trccompanies.com>; Falkinburg, Brad <BFalkinburg@trccompanies.com>
Subject: RE: [EXTERNAL] 25-1636_TRC - Aligned Data Center Phase 2 - ODNR Comments

Good Morning Eileen,

In response to ODNR's DOW recommendations (attached), TRC completed a desktop habitat assessment to determine if potential hibernaculum is present within FirstEnergy's proposed Aligned Data Center Phase 2 Project located in Perkins Township, Erie County, Ohio.

Please let us know if you have any questions on the provided desktop assessment.

Thank you,

Emma Given, Ph.D., PWS
Ecologist
Planning, Permitting, and Licensing



1382 W 9th St, Suite 400, Cleveland, OH 44113
C 330.446.0265 | EGiven@trccompanies.com
[LinkedIn](#) | [Twitter](#) | [Blog](#) | TRCcompanies.com

From: EnvironmentalReviewRequest@dnr.ohio.gov <EnvironmentalReviewRequest@dnr.ohio.gov>
Sent: Friday, November 21, 2025 3:08 PM
To: Given, Emma <EGiven@trccompanies.com>
Cc: Molnar, Maggie <MMolnar@trccompanies.com>; Falkinburg, Brad <BFalkinburg@trccompanies.com>
Subject: [EXTERNAL] 25-1636_TRC - Aligned Data Center Phase 2 - ODNR Comments

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Please see the attached ODNR Environmental Review comment letter for your Environmental Review request.

Any questions regarding the letter should be directed to Mike Pettegrew at mike.pettegrew@dnr.ohio.gov.

Thank you,

	<p>Mike Pettegrew <i>Environmental Services Administrator</i> Ohio Department of Natural Resources, Office of Real Estate & Land Management 2045 Morse Road, Building E-2 Columbus, Ohio 43229 Office: (614) 265-6387 mike.pettegrew@dnr.ohio.gov https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-ODNR/real-estate/environmental-review/</p>
<p><small><i>This message is intended solely for the addressee(s). Should you receive this message by mistake, we would be grateful if you informed us that the message has been sent to you in error. In this case, we also ask that you delete this message and any attachments from your mailbox, and do not forward it or any part of it to anyone else. Thank you for your cooperation and understanding.</i></small></p>	

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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



November 19, 2025

Project Code: 2026-0007149

Dear Ms. Given:

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

Federally Threatened and Endangered Species: Due to the project type, size, location, and the proposed implementation of seasonal tree cutting (clearing of trees ≥ 3 inches diameter at breast height between October 1 and March 31) to avoid impacts to the endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*), and the proposed endangered tricolored bat (*Perimyotis subflavus*) we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

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

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

species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Erin Knoll".

Erin Knoll
Field Office Supervisor

Surface Water Delineation Report

Aligned Data Center Phase 2
Project

Perkins Township, Erie County, Ohio

January 2026

Prepared For:



FirstEnergy Corporation
341 White Pond Drive, Building B3
Akron, Ohio 44320

Prepared By:
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ACRONYMS AND DEFINITIONS

1987 Manual	United States Army Corps of Engineers 1987 Wetland Delineation Manual
APT	Antecedent Precipitation Tool
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
FAC	Facultative
FACU	Facultative Upland
FACW	Facultative Wetland
FirstEnergy	FirstEnergy Corporation
GPS	Global Positioning System
HHEI	Headwater Habitat Evaluation Index
HUC	Hydrologic Unit Code
NHD	National Hydrography Dataset
NWI	National Wetlands Inventory
OAC	Ohio Administrative Code
OBL	Obligate Wetland
OEPA	Ohio Environmental Protection Agency
OHWM	Ordinary High-Water Mark
ORAM	Ohio Rapid Assessment Method
Project	Aligned Data Center Phase 2 Project
Project Study Area	8.46 acres, located in Perkins Township, in Erie County, Ohio
QHEI	Qualitative Habitat Evaluation Index
Redox	Redoximorphic
Regional Supplements Report	Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (Version 2.0) Surface Water Delineation Report
ROW	Right-of-Way
TRC	TRC Environmental Corporation
UPL	Obligate Upland
USACE	United States Army Corps of Engineers
USDA-NRCS	United States Department of Agriculture – Natural Resources Conservation Service
USFWS	United States Fish and Wildlife Service
WOTUS	Waters of the United States
WWH	Warmwater Habitat

1.0 Introduction

On behalf of FirstEnergy Corporation (FirstEnergy), TRC Environmental Corporation (TRC) performed a surface water delineation for the Aligned Data Center Phase 2 Project (Project). The proposed Project Study Area is 8.46 acres and is located in Perkins Township, Erie County, Ohio. This proposed work includes the construction of a line tap in support of the proposed Aligned Data Center. On behalf of FirstEnergy, TRC has prepared this Surface Water Delineation Report (Report) for the Project. A site location map of the Project Study Area can be found in **Appendix A, Figure 1**.

TRC personnel performed field investigations to evaluate and delineate surface water resources (i.e., wetlands and streams) located within the Project Study Area on January 13, 2026. The delineations were conducted by qualified wetland scientists 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. This Report describes the surface water delineation methodology implemented and the existing surface water resources identified within the Project Study Area during field investigations.

The Project Study Area includes a primary linear portion with three additional supporting areas and is located at the following approximate coordinates (latitude, longitude):

Northern Terminus: 41.432287, -82.727405
Southern Terminus: 41.425568, -82.724697

The Project Study Area is located in Perkins Township, in Erie County, Ohio. The Project Study Area is comprised of an existing, maintained utility right-of-way (ROW) located within agricultural (row crop and pasture) and industrial (salvage yard) land use. The adjacent land use consists of undeveloped woodland, industrial land use, and agricultural land use. Based upon review of available historic aerial imagery (1985-2025), land use surrounding the Project Study Area in years prior to the field investigation was dominated by forested habitat and agricultural and industrial land use. The existing, maintained utility ROW is observed in 1997 historical aerial mapping. The Project Study Area is accessed along the roadway ROW, through approved private land-owner property, and via the existing, maintained utility ROW. **Appendix A, Figure 1 and Figure 2**, provide further information on the location of the proposed Project Study Area.

1.1 Statement of Qualifications

TRC has extensive experience managing and conducting wetland delineations and threatened and endangered species habitat surveys across the United States. TRC's biologists and ecologists have been trained to properly and consistently apply the methods set forth in the 1987 Corps of Engineers *Wetland Delineation Manual (1987 Manual)* (USACE, 1987) and applicable regional supplements. They have direct experience identifying and documenting indicators of hydrophytic vegetation, wetland hydrology, and hydric soil and are experienced in dealing with

naturally problematic and disturbed conditions. Additionally, they are experienced in reviewing and identifying appropriate habitat conditions for threatened and endangered species.

Erin Van Nort is a Senior Wetland Scientist with over 20 years of experience working in natural resources and was the principal investigator for this Project. Her credentials include Professional Wetland Scientist (3406) and Pre-Qualified Consultant with the Ohio Department of Transportation for Waterway Permitting and Ecological Services. She is adept at determining wetland and stream quality using the Ohio Environmental Protection Agency (OEPA) methodologies and has negotiated hundreds of permit approvals for Federal §404 Individual, Nationwide Permits, and Ohio §401 permits. She has served as a lead wetland delineator and biologist on a broad array of projects, including solar, gas, transmission line, transportation, and commercial and residential developments, and has authored numerous wetland reports, watershed plans, and grant applications.

Talon Cline is an Ecologist with TRC and has over 3 years of experience in natural resource management, wetland delineating, and technical writing. He authored the delineation report and was the wetland delineation technician for the Project. Mr. Cline has a B.S. in Environmental and Conservation Biology from Kent State University, with a specialization in aquatic resources and herpetology. He has served as a technician on a variety of projects including gas, transmission line, transportation, and commercial development across Ohio, and parts of Pennsylvania, Alabama, and Georgia.

2.0 Methodology

To complete the surface water delineation and evaluation of the Project Study Area, TRC followed the guidelines and methods outlined by the USACE and Ohio Environmental Protection Agency (OEPA), as described within this section.

2.1 Wetland Parameters

Delineations were completed following the *1987 Manual* (USACE, 1987) Level 2 Routine Approach (*Part IV, Section D., Subsection 2 - Onsite Inspection Necessary*) for areas equal to or less than 5 acres in size, the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region* (USACE, 2012).

Furthermore, the March 6, 1992 guidance memorandum (Williams, 1992) emphasizes a three-parameter approach to wetland boundary determination in the field. This approach involves the following:

- i. Evidence of wetland hydrology;
- ii. Presence of hydric soils; and
- iii. Predominance of hydrophytic vegetation as defined by the *2022 National Wetland Plant List* (USACE, 2023).

Positive indicators of all three parameters are normally present in wetlands and serve to distinguish between both dry land and transitional plant communities.

2.1.1 Hydrology

The *1987 Manual* and *Regional Supplements* provide guidelines for determining the presence of wetland hydrology. Criteria for wetland hydrology are met if the area is inundated or saturated at the soil surface during the growing season for a time sufficient to develop hydric soils and to support hydrophytic vegetation.

2.1.2 Hydric Soils

Hydric soils are defined as soils “that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil” (Federal Register, 1994). Hydric soil indicators described in the United States Department of Agriculture – Natural Resources Conservation Service’s (USDA-NRCS) *Field Indicators of Hydric Soils in the United States: A Guide for Identifying and Delineating Hydric Soils Version 9.0* (USDA, NRCS, 2024) were used to identify and document hydric soils per the *Regional Supplements*.

2.1.3 Hydrophytic Vegetation

To determine the presence of hydrophytic vegetation, the dominant and non-dominant species in each major vegetative stratum (e.g., tree, shrub/sapling, herbaceous, and woody vine) were identified and recorded.

Plants are placed into indicator status categories depending on their probability of occurring in a wetland in accordance with the USACE’s *The National Wetland Plant List: 2022 wetland ratings* (USACE, 2023). There are five indicator status categories for plants:

1. Obligate wetland plants (OBL): plants that occur almost always (>99%) in wetlands in natural conditions, but which may also occur rarely (<1%) in non-wetlands;
2. Facultative wetland plants (FACW): plants that occur usually (>67-99%) in wetlands but also occur (1-33%) in non-wetlands;
3. Facultative plants (FAC): plants with a similar likelihood (33-67%) of occurring in both wetlands and non-wetlands;
4. Facultative upland plants (FACU): plants that occur sometimes (1-<33%) in wetlands, but occur more often (>67-99%) in non-wetlands; and
5. Obligate upland plants (UPL): plants that occur rarely (<1%) in wetlands but occur almost always (>99%) in non-wetlands under natural conditions.

A prevalence of dominant species that are FAC, FACW, and/or OBL indicates the presence of hydrophytic vegetation.

2.2 USACE Wetland Delineation

Qualified wetland scientists from TRC conducted surface water field investigations on January 13, 2026. The surface water field investigations were conducted within the predetermined Project Study Area (**Appendix A, Figure 1**) that was developed in accordance with the Project location information provided by FirstEnergy. Surface water delineations were conducted using the Level 2 Federal Routine Determination Method presented in the *1987 Manual* and *Regional Supplements*, including clarifications and interpretations provided in the March 6, 1992 guidance memorandum (Williams, 1992), and the USACE and Environmental Protection Agency (EPA) guidance on jurisdictional forms (USACE, 2008). USACE Wetland Determination Data Forms – Northcentral and Northeast Region is provided within **Appendix D**.

Hydrology was determined based on a number of indicators that are divided into two categories, primary and secondary. The *1987 Manual* defines hydrology as present when at least one (1) primary indicator or two secondary indicators are identified. One primary indicator is sufficient to determine if hydrology is present; however, if these are absent then two (2) or more of the secondary indicators are required to determine hydrology. If other probable hydrologic evidence was found, then this was subsequently documented on the data form.

Soils were examined in the field by using a tile spade, generally to a depth of at least 22 inches below the soil surface, until refusal, or positive hydric soil indicators were met above 22 inches, whichever was shallower. Soil coloration was identified using a Munsell Soil Color Chart (Munsell Color Company, 2009). Other characteristics, such as the presence of redoximorphic (Redox) concentrations and depletions and soil texture were also recorded. Redox concentrations and depletions are created when the soil is saturated and has anaerobic conditions (without oxygen gas) which leads to changes in the chemical processes in the soil that produce visible color changes in the soil. Hydric characteristics such as organic soil layers, depleted matrix, gleying, and hydrogen sulfide odor, were noted when observed. Soils at both wetland (if present) and dry land data plot locations were characterized and recorded on the data form.

The presence of hydrophytic vegetation was determined using the procedures described in the *Regional Supplements* and recorded on the data form. Vegetation in both dry land and wetland communities was characterized using a real dominance method, with a radius of 30-foot around the soil sample location for trees and woody vines, 15-foot radius for saplings and shrubs, and a 5-foot radius for herbaceous plants. Plant communities meeting the “50/20” Rule or meeting one of the other indicators set forth in the *1987 Manual*, *Regional Supplements*, and guidance memorandums are considered hydrophytic for the purposes of the wetland classification criteria. In areas where the vegetation was disturbed or not identifiable due to seasonal conditions, soil and hydrology characteristics, and professional judgment/experience were utilized in assessing the primary determining factors for classification as wetlands.

If the soils, hydrology, and vegetation characteristics at a survey point indicated that it was within a wetland, the boundary of the wetland was determined, and the approximate boundary was flagged using wetland flagging and recorded using a handheld Juniper Systems Geode and Trimble R1 with sub-meter accuracy. Areas observed to have problematic or difficult situations

were delineated utilizing the procedures identified in the *Regional Supplements*, Section 5 – “Difficult Wetland Situations in the Northcentral and Northeast Region” Data from the Global Positioning System (GPS) survey was downloaded and integrated into a Geographic Information System database for the proposed work areas and used to make the accompanying figures. Identified wetlands were classified according to Cowardin et al. (Cowardin, Carter, Golet, & LaRoe, 1979). Photographs are included in **Appendix C**.

2.3 Ohio Environmental Protection Agency’s Ohio Rapid Assessment Method

According to the Ohio Wetland Water Quality Standards, a wetland quality category (Category 1, Category 2, or Category 3) must be assigned for each wetland if a project will require discharge of dredged or fill material into jurisdictional wetlands. In general, Category 1 wetlands are considered to be of “low quality”, Category 2 wetlands are considered to be of “moderate quality,” and Category 3 wetlands are considered to be of “high quality.”

The OEPA has developed the Ohio Rapid Assessment Method (ORAM), which can be utilized to evaluate wetland habitat quality based on the apparent functions and values of the wetland resource. The two primary components of the ORAM are the Narrative Rating and the Quantitative Rating. TRC completed ORAM (Version 5.0) Quantitative Rating forms for all the wetland resources identified within the Project Study Area. Each delineated wetland resource received a provisional category designation based on the results of the ORAM Narrative and Quantitative Ratings and review of narrative criteria in the Ohio Administrative Code (OAC) 3745-1-54(C) (Mack, 2000). OEPA ORAM Rating and Categorization Forms are provided within **Appendix D**.

2.4 USACE Waterbody Identification

During field investigations, other waterbody features including streams, ponds, lakes, etc. were investigated. Streams within the Project Study Area were identified by the presence of an ordinary high-water mark (OHWM) and scoured channel or defined bed and banks. The OHWM was delineated based on the OHWM as defined in 33 CFR Part 328.3 and 33 CFR 329.4 (as applicable), in accordance with the Regulatory Guidance Letter No. 05-05 and the *National Ordinary High Water Mark Field Delineation Manual for Rivers and Streams* (USACE, 2005; USACE and EPA, 2025). All streams identified in the Project Study Area that were wider than five feet were demarcated via GPS from bank-to-bank. Streams that were less than five feet wide had the centerline demarcated. Streams identified during the course of the investigation were classified as perennial, intermittent, or ephemeral waterways in accordance with the rationale defined by the USACE Buffalo District.

The Project Study Area was also investigated for areas that were considered “open water” by the USACE. These open waters were also delineated based on their (USACE, 2005). According to the USACE, an open water is an area that in a year with normal patterns of precipitation has water flowing or standing above ground to the extent that an OHWM can be determined. Aquatic vegetation within the area of flowing or standing water is either non-emergent, sparse, or absent.

Vegetated shallows are considered to be open waters. Examples of “open waters” may include rivers, lakes, and ponds. Artificial “open water” features may include stormwater retention basins, fish hatchery ponds, drainage tile pump stations, etc.

2.5 OEPA Waterbody Quality Quantification

In addition, streams were evaluated utilizing OEPA approved methods for stream habitat assessment which include the Qualitative Habitat Evaluation Index (QHEI) (OEPA, 2006) (Rankin, 1989) and/or the Headwater Habitat Evaluation Index (HHEI) (OEPA, 2020) assessment method. These approved assessment methods provide an empirical, quantified evaluation of streams as required by the State of Ohio for permitting and mitigation purposes. These methods assess stream habitat to provide a qualitative index (or score) to determine the level of compensatory mitigation that may be needed for impacts to waters of the United States (i.e., streams).

Use of the QHEI or HHEI assessment method is determined based on the size of the stream’s drainage area and/or the stream’s pool depths. Where coverage was available, the drainage area was calculated using automated basin characteristics from StreamStats v 4.30.0 (USGS, 2021).

2.5.1 Qualitative Habitat Evaluation Index

Following OEPA guidance, streams with a drainage area of greater than 1.0 square mile (2.6 square kilometers) or which have pools with maximum depths over 15.8 inches (40.0 centimeters), as determined by measuring pool depth within the stream, were evaluated using the QHEI. Data on these streams were collected on the QHEI form provided by the OEPA. The QHEI is composed of six principal metrics: substrate, instream cover, channel morphology, riparian zone and bank erosion, pool/glide and riffle-run quality, and map gradient. Each metric is scored separately and summed to obtain the total QHEI score. Using the scoring methods associated with these forms, the stream is placed into the following general narrative ranges, dependent upon stream size; for smaller streams (≤ 20 sq. mi): Excellent >70 , Good 55-69, Fair 43-54, Poor 30-42, and Very Poor <30 ; for larger streams (>20 sq. mi): Excellent >75 , Good 60-74, Fair 45-59, Poor 30-44, and Very Poor <30 .

2.5.2 Headwater Habitat Evaluation Index

The HHEI was utilized to score streams with a drainage area of <1.0 square mile (2.6 square kilometers). Data on these streams was collected on the HHEI forms, provided by the OEPA (OEPA, 2020). Observational data regarding the physical nature of the stream corridor including stream flow, riparian zone land use and buffer width, and channel modification was recorded. Measurements included bank full width, maximum pool depth, and substrate composition. centerline demarcated.

3.0 Results

3.1 Site Description

The Project Study Area is 8.46 acres located in Perkins Township, Erie County, Ohio. The Project Study Area is located within the Mills Creek sub-watershed (12-Digit Hydrologic Unit Code [HUC]): 041000110103 (USGS, 2022).

The Project Study Area is shown on the Sandusky, Ohio United States Geological Survey 7.5-minute series topographic quadrangle (**Appendix A, Figure 1**) (USGS, 2023).

There are no United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) features mapped within the Project Study Area. (**Appendix A, Figure 4**) (USFWS, 2023).

The USGS National Hydrography Dataset (NHD) (USGS, 2018) Downloadable Data Collection from The National Map is a comprehensive set of digital spatial data that encodes information about naturally occurring and constructed bodies of surface water (e.g., lakes, ponds, and reservoirs), paths through which water flows (e.g., canals, ditches, streams, and rivers) and related entities such as point features (e.g., springs, wells, stream gages, and dams). There are no NHD streams mapped within the Project Study Area (**Appendix A, Figure 4**).

According to Federal Emergency Management Agency Flood Insurance Rate Map Panel 39043C0086D (eff. 08.28.2008), several portions of the proposed Project are located within a mapped 100-year floodplain (**Appendix A, Figure 4**) (FEMA, 2024).

The USACE Antecedent Precipitation Tool (APT) Version 3.0 (USACE, 2025) was used to collect 90-day antecedent precipitation data. The following nearby (~22 miles or less) weather stations were used for collecting APT data for the January 13, 2026, field investigation: Fremont, Fremont 0.5 SW, Fremont 2.2 ENE, and Fremont AGN STN. Compared to historical data, antecedent hydrologic conditions in 2026 were considered to be drier than normal. Typical conditions for the time of year (wet season) were observed, although the drought index data was not available (USACE, 2025). APT results are provided within **Appendix B**.

The USDA-NRCS Web Soil Survey (USDA-NRCS, 2016) was used to identify the soil types contained within the Project Study Area (**Appendix A, Figure 3**). **Table 1** provides a summary of the soils identified within proposed Project Study Area.

Table 1. Soils Type Summary

Map Unit Symbol	Map Unit Name	Hydric Status	Acres Within Project Study Area	Percent Cover in Project Study Area
FuA	Fulton silty clay loam, 0 to 2 percent slopes	Non-Hydric with Hydric Inclusions	4.57	54.03%
RaA	Randolph silt loam, 0 to 2 percent slopes	Non-Hydric with Hydric Inclusions	0.26	3.13%

Map Unit Symbol	Map Unit Name	Hydric Status	Acres Within Project Study Area	Percent Cover in Project Study Area
ShB	Shinrock silt loam, 2 to 6 percent slopes	Non-Hydric with Hydric Inclusions	0.85	10.03%
SkD2	Shinrock silty clay loam, 12 to 18 percent slopes, eroded	Non-Hydric with Hydric Inclusions	0.30	3.53%
ToA	Toledo silty clay, 0 to 1 percent slopes	Hydric	2.48	29.28%
Total:			8.46	100.00%

Notes:

Accessed online January 2026 at: <http://websoilsurvey.sc.egov.usda.gov>.

3.2 Surface Water Resource Field Delineations

TRC performed field investigations on January 13, 2026. During the 72 hours prior to the field investigation, the surrounding area averaged 0.06 inches of rainfall per day, and the average temperature was 41 degrees Fahrenheit. Native and non-native herbaceous vegetation was observed within the Project Study Area. During the field investigation, overall on-site observations of hydrology revealed normal conditions. The results of the APT are discussed in Section 3.1 and can be found in **Appendix B**. Native and non-native herbaceous vegetation was observed within the Project Study Area. The USACE maintains the final authority that determines jurisdiction; therefore, statements about jurisdiction within this Report are preliminary and subject to final determination by the USACE and OEPA.

3.2.1 Wetlands

During the field investigation, three (3) wetlands were identified and delineated within the Project Study Area. The delineated wetland boundaries and sample points are shown on **Figure 5** in **Appendix A**. Representative photographs of sample points and other areas of interest are provided in **Appendix C**. Data were collected and recorded on the USACE Wetland Determination Data Forms – Northcentral and Northeast Region (**Appendix D**) and wetland functional assessments were completed for each delineated wetland using the ORAM (**Appendix D**). Delineated wetlands within the Project Study Area are summarized in **Table 2**.

Table 2. Delineated Wetland Features Summary

Wetland ID ¹	Latitude, Longitude	Delineation Date	Extends Outside Project Study Area (Y/N)?	Cowardin Classification the Study Area ²	Water Regime Modifier ³	Connection ⁴	Apparent Downstream Connectivity	Provisional Jurisdictional Status ⁵	ORAM Score	ORAM Category ⁶	Approximate Delineated Area within Project Study Area ⁷ (acres)
W-EVN-1	41.431791, -82.727597	01/13/2026	Y	PEM	Seasonally Flooded	Abutting/Adjacent	Wetland W-EVN-1 ⇔ Mills Creek ⇔ Lake Erie	USACE Jurisdictional Wetland	8	Cat. 1	0.023
W-EVN-2	41.429563, -82.727486	01/13/2026	Y	PEM/PSS	Seasonally Flooded	Abutting/Adjacent	Wetland W-EVN-2 ⇔ Mills Creek ⇔ Lake Erie	USACE Jurisdictional Wetland	27	Cat. 1	1.588 (1.568 [PEM] + 0.020 [PSS])
W-EVN-3	41.427477, -82.727751	01/13/2026	Y	PEM	Seasonally Flooded	Abutting/Adjacent	Wetland W-EVN-3 ⇔ Mills Creek ⇔ Lake Erie	USACE Jurisdictional Wetland	5	Cat. 1	0.075
Total:											1.686
<p>¹TRC resource identification.</p> <p>²Cowardin Wetland Classification within Project Study Area (approximation based upon field identification and delineation) (Cowardin, Carter, Golet, & LaRoe, 1979): PEM – Palustrine Emergent; PSS – Palustrine Scrub Shrub</p> <p>³National Wetland Inventory Wetlands and Deepwater Map Code Diagram – Modifiers for non-tidal waters (USFWS, 2019)</p> <p>⁴Connection to a jurisdictional waterway: Isolated or Adjacent as determined by TRC; subject to USACE verification. Wetland connection is pending an update from EPA and USACE based on the EPA vs. Sackett case.</p> <p>⁵Jurisdiction status is based upon field observations and mapping review of apparent connectivity or adjacency of the resource to Waters of the United States and the assumption that a preliminary jurisdictional determination process will be utilized for the project.</p> <p>⁶ORAM Category assigned based on scoring breakpoints from Table 2 of the ORAM v. 5.0 Quantitative Score Calibration.</p> <p>⁷Area is rounded to nearest 0.001-acre, based upon GPS data.</p>											

3.2.2 Streams and Waterbodies

During the field investigations, one (1) stream, S-EVN-1, was delineated within the Project Study Area. A detailed summary of the identified stream is provided in **Table 3** and **Appendix A, Figure 5**. A data point was recorded to provide a characterization of the delineated stream resource located within the Project Study Area, which was recorded on the OEPA HHEI data form. The HHEI data form is provided within **Appendix D**. Representative photographs of the described stream identified within the Project Study Area can be found in **Appendix C**.

Table 3. Delineated Stream and Waterbody Features Summary

Stream ID ¹	Latitude, Longitude	Delineation Date	Resource / Downstream Flow Path	Flow Regime	OEPA Use Designation	Existing Use Designation ²	HHEI Score ³	Approximate Delineated Length within Project Study Area ⁵ (linear feet/acre)
S-EVN-1	41.425970, -82.725283	01/13/2026	S-EVN-1 ⇒ Mills Creek ⇒ Lake Erie	Perennial	-	Modified Class II PHW	40	183 feet (0.042 acre)
							Total:	183 feet (0.042 acre)
Notes:								
¹ TRC resource identification.								
² Determined by TRC, subject to verification by OEPA. PHW = Primary Headwater								
³ HHEI, for streams with drainage areas of less than 1.0 square mile and a maximum pool depth of less than 40 centimeters.								
⁴ QHEI, for streams with drainage areas of greater than 1.0 square mile and a maximum pool depth greater than 40 centimeters.								
⁵ Length is rounded to nearest foot, based upon GPS data. Area is rounded to nearest 0.001-acre, based upon GPS data. Resources comprising <0.001-acre are tabulated within the total as 0.001-acre.								

4.0 Permitting Considerations

It is anticipated that due to the nature of the Project, jurisdictional resources may be impacted by the proposed Project activities. It is TRC's understanding that this Project would fall under Nationwide Permit (NWP) 57 - Electric Utility Line and Telecommunications Activities (USACE, 2022). This Project is located in Perkins Township, Erie County, Ohio. The Project is located within the USACE Buffalo Regulatory District. Perkins Township in Erie County, Ohio is not listed in Appendix 1 to Regional General Condition 5(a) (Endangered Species and Threatened Species), therefore, Regional General Condition 5(a) does not trigger the need for Section 404 Pre-Construction Notification (PCN), assuming all other NWP 57 thresholds are met and not exceeded (USACE, 2021).

Additionally, the Project is located within an "Eligible" area according to OEPA's Stream Eligibility for the Nationwide Permit Program (OEPA, 2017) (**Appendix A, Figure 6**); however, OEPA's 401 Water Quality Certification for NWP 57 is currently waived under the 2022 reissuance. This permit program is set to expire on March 14, 2026. At this time, no additional screening procedures are required for the Project regarding compliance with OEPA's 401 Water Quality Certification (USACE, 2022).

4.1 USACE Verification

The USACE has the authority to determine and/or verify the geographical boundaries of Waters of the United States (WOTUS) in accordance with 33 Code of Federal Regulations (CFR) 328 and 33 CFR 329; therefore, the results of this Report are termed "preliminary" until verified and accepted by the USACE. This verification is part of the Jurisdictional Determination process, which is required for approval under Section 404 Clean Water Act, Section 401 Water Quality Certification, and/or isolated wetland permitting process through OEPA. It is the responsibility of any party that intends to discharge dredge or fill material into WOTUS to comply with all applicable regulations.

5.0 Limitations

This Report is limited in scope to the specific terms of the Agreement previously entered into between TRC and FirstEnergy. This Report represents the conditions within the Project Study Area identified herein, as of the inspection dates.

Should the Project change from the scope described herein, TRC should be immediately notified such that additional investigations may be conducted to amend the content of the Report herein. Human-induced and/or natural changes within the Project Study Area may occur after the date of this investigation and may result in changes to the presence, extent, and classification of the surface water resources identified within this Report.

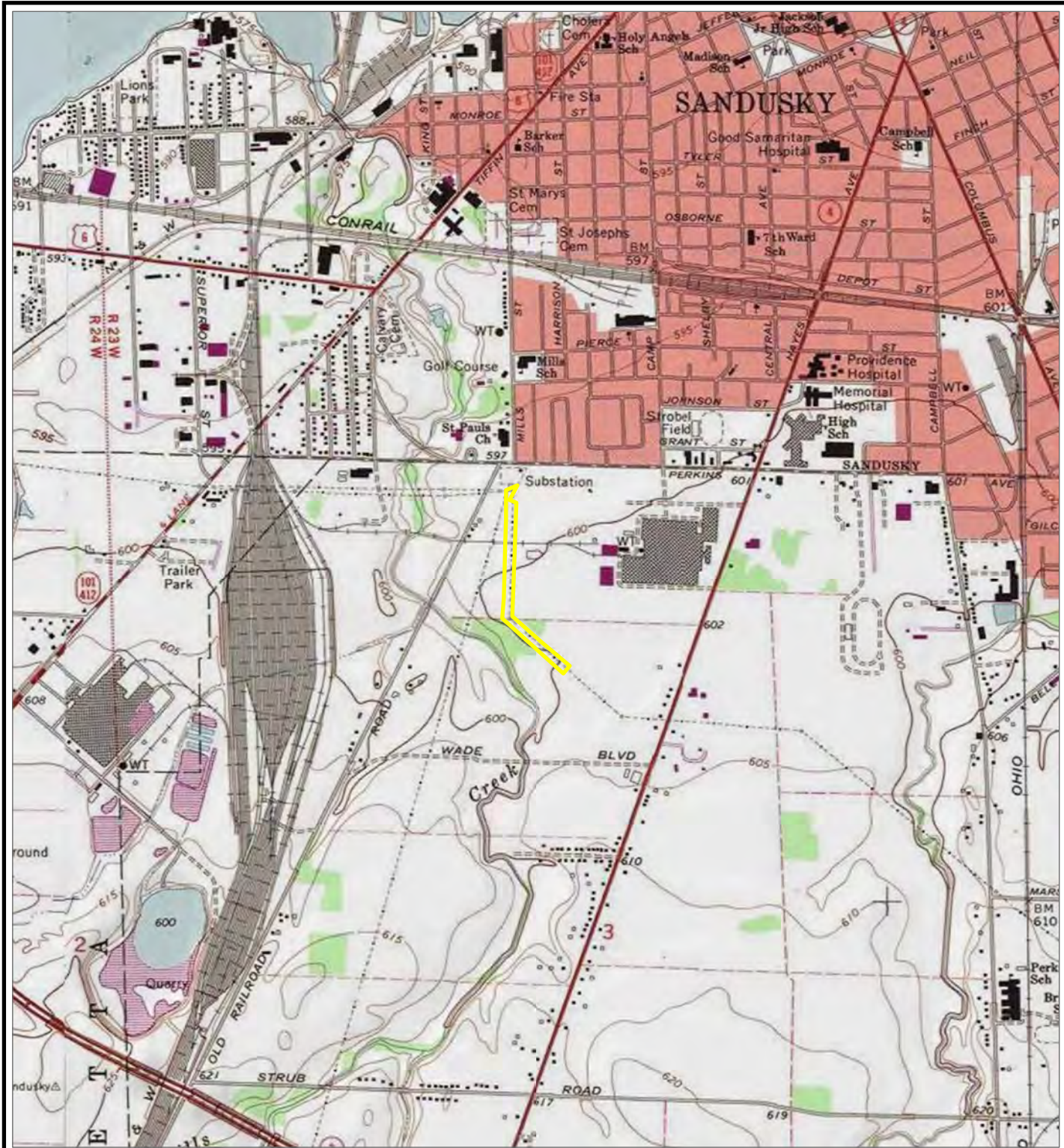
6.0 References

- Cowardin, L., Carter, V., Golet, F., & LaRoe, E. (1979). *Classification of Wetland and Deepwater Habitats of the United States*. 103 pp. U.S. Fish and Wildlife Service.
- Federal Register. (1994, July 13). Changes in hydric soils of the United States.
- FEMA. (2024, March). *FEMA Flood Map Service Center*. Retrieved January 2026, from U.S. Department of Homeland Security: Federal Emergency Management Agency: <https://msc.fema.gov/portal>
- Mack, J. (2000). ORAM v. 5.0 Quantitative Score Calibration. Columbus, Ohio: Ohio Environmental Protection Agency, Division of Surface Water, 401/Wetland Ecology Unit.
- Munsell Color Company. (2009). *X-Rite Munsell Soil Color Book 2009 Revised Edition*.
- NIDIS. (2025). *National Integrated Drought Information System*. Retrieved January 2026, from <https://www.drought.gov/historical-information?dataset=0&selectedDateUSDM=20251111>
- OEPA. (2006). *Methods for Assessing Habitat in Flowing Waters: Using the Qualitative Habitat Evaluation Index (QHEI)*. Columbus, OH: Division of Surface Water, Ohio Environmental Protection Agency.
- OEPA. (2017). 401 Water Quality Certification for Nationwide Permit Eligibility Online Map. Retrieved January 2026, from <https://www.arcgis.com/apps/webappviewer/index.html?id=e6b46d29a38f46229c1eb47deefe49b6>
- OEPA. (2020). *Field Methods for Evaluating Primary Headwater Streams in Ohio (Version 4.1) (HHEI)*. Columbus, OH: Division of Surface Water, Ohio Environmental Protection Agency.
- Ohio Administrative Code Rule 3745-1-12. (n.d.). Sandusky River Drainage Basin, Table 12-1. *Use Designations for Water Bodies in the Black River Drainage Basin*.
- Rankin, E. T. (1989, November 6). The Qualitative Habitat Evaluation Index (QHEI): Rationale, Methods, and Application. Columbus, Ohio: Ohio Environmental Protection Agency, Division of Surface Water.
- USACE. (1987). *Corps of Engineers Wetlands Delineation Manual*. Vicksburg, MS: Environmental Laboratory U.S. Army Corps of Engineers.
- USACE. (2005, December 7). Regulatory Guidance Letter No. 05-05: Ordinary High Water Mark Identification.
- USACE. (2008, June 26). Regulatory Guidance Letter, Subject: Jurisdictional Determinations.
- USACE. (2012). *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (Version 2.0)*. Vicksburg: U.S. Army Engineer Research and Development Center Environmental Laboratory: U.S. Army Corps of Engineers.
- USACE. (2021, January 13). 86 FR 2744. *NWP 57*.
- USACE. (2022, February 23). *Nationwide Permits for the State of Ohio*.
- USACE. (2023). *The 2022 National Wetland Plant List, version 3.6*. Retrieved from <http://wetland-plants.usace.army.mil/>

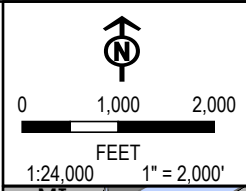
- USACE. (2025). *Antecedent Precipitation Tool (APT) Version 3.0.8. ERDC/TN WRAP-25-1*. Vicksburg, MS: USACE Engineer Research and Development Center. Retrieved January 2026, from APT GitHub repository
- USACE and EPA. (2025, January). National Ordinary High Water Mark Field Delineation Manual for Rivers and Streams. (C. R. Laboratory, Ed.) Hanover, NH 03755-1290: The US Army Engineer Research and Development Center.
- USDA, NRCS. (2024). Field Indicators of Hydric Soils in the United States, Version 9.0. (L. Vasilas, G. Hurt, & C. Noble, Eds.) USDA, NRCS in cooperation with the National Technical Committee for Hydric Soils.
- USDA-NRCS. (2016). Web Soil Survey. Retrieved January 2026, from <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>
- USFWS. (2019, February 1). Wetlands and Deepwater Habitat Classification Diagram. Retrieved from <https://www.fws.gov/sites/default/files/documents/wetlands-and-deepwater-map-code-diagram.pdf>
- USFWS. (2023). National Wetlands Inventory. Retrieved January 2026, from <http://www.fws.gov/wetlands/Data/Mapper.html>
- USGS. (2018). National Hydrography Dataset. Retrieved January 2026, from <https://nhd.usgs.gov/data.html>
- USGS. (2021). *The StreamStats Program, v 4.30.0*. (U.S. Geological Survey) Retrieved December 2025, from StreamStats Ohio: <https://streamstats.usgs.gov/ss/>
- USGS. (2022, February). *The National Map (TNM)*. Retrieved January 2026, from <https://apps.nationalmap.gov/viewer/>
- USGS. (2023). Topographical Quadrangle Maps (7.5 minute series). *Sandusky, OH 7.5 minute Quadrangle*. U.S. Geological Survey.
- USGS. (2025). *National Water Dashboard*. Retrieved January 2026, from <https://dashboard.waterdata.usgs.gov/app/nwd/en/?region=lower48>
- Williams, A. (1992). Memorandum: Clarification and Interpretation of the 1987 Manual. U.S. Army Corps of Engineers.

Appendix A

Figures



 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, SANDUSKY QUAD

PROJECT: **FIRSTENERGY
ALIGNED DATA CENTER - PHASE 2
ERIE COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL	PROJ. NO.: 664675 P18
CHECKED BY: M. MOLNAR	FIGURE 1
APPROVED BY: B. FALKINBURG	
DATE: JANUARY 2026	



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

FILE: WDRV2

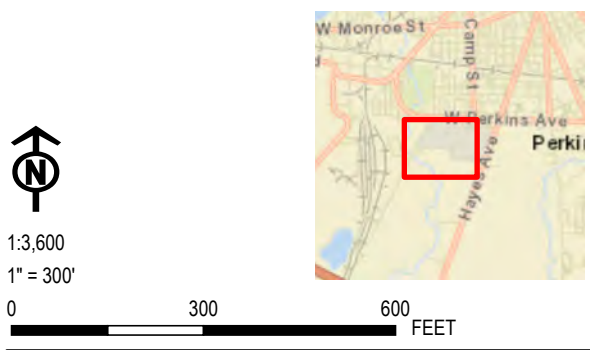
COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH RIPS 3401 FEET, MAP ROTATION: 0
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Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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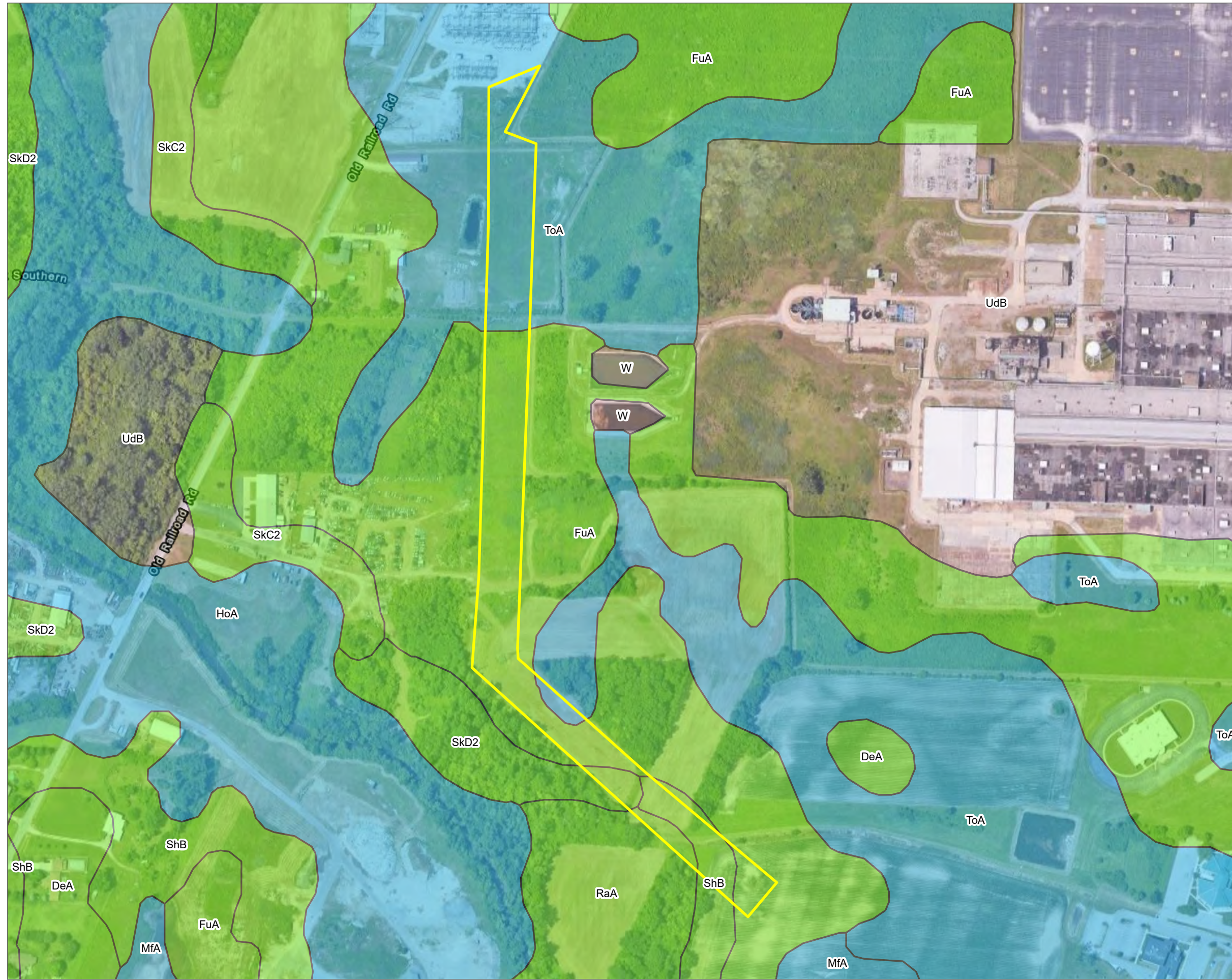
- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



PROJECT: FIRSTENERGY ALIGNED DATA CENTER - PHASE 2 ERIE COUNTY, OH	
TITLE: AERIAL MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P18
CHECKED BY: M. MOLNAR	FIGURE 2
APPROVED BY: B. FALKINBURG	
DATE: JANUARY 2026	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDRv2.aprx

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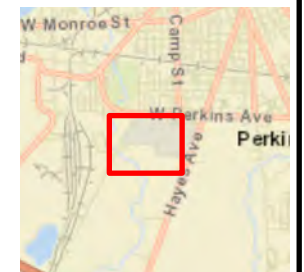


- PROJECT STUDY AREA
- HYDRIC SOIL
- NON-HYDRIC W/ HYDRIC INCLUSIONS SOIL
- NON-HYDRIC SOIL

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

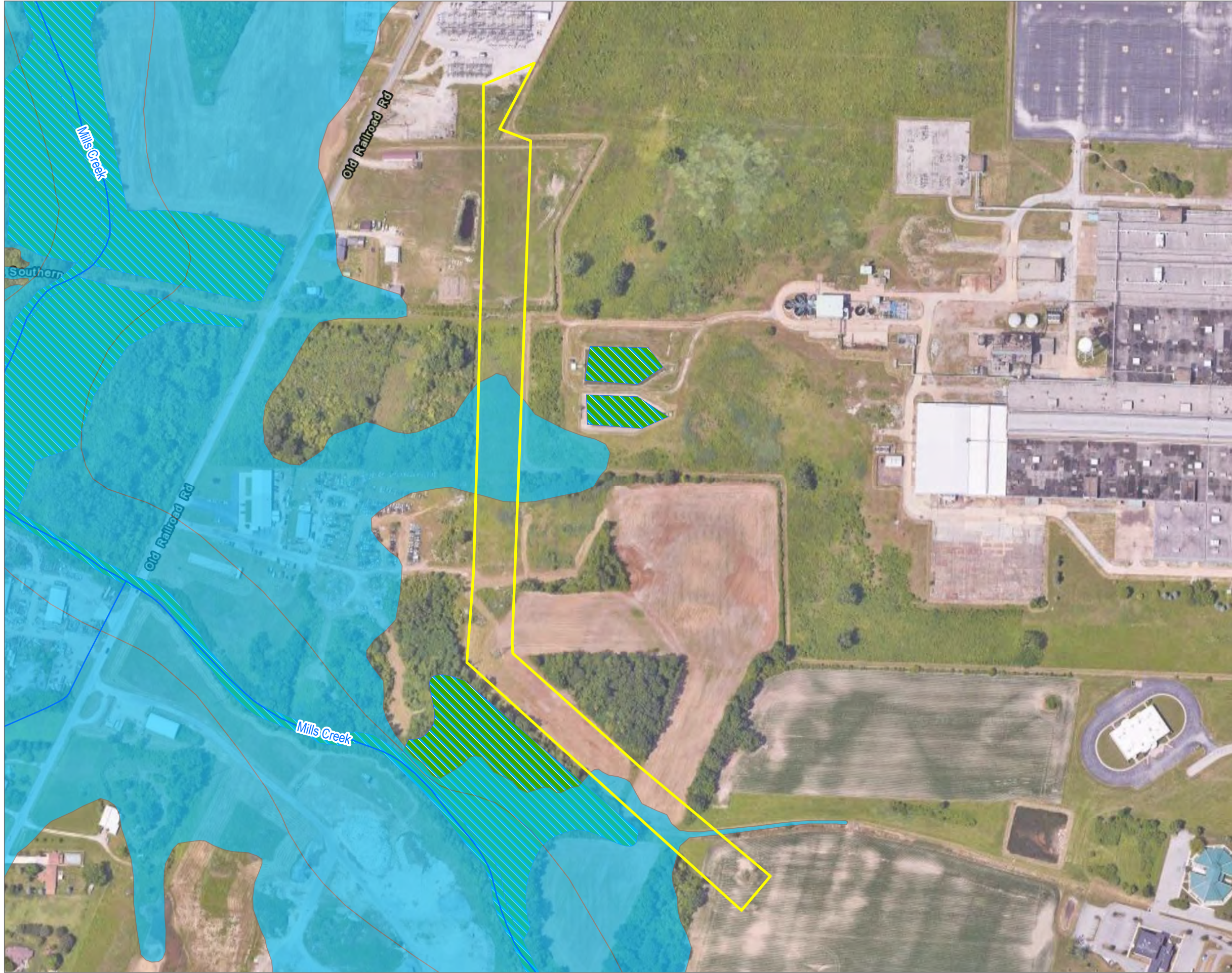


1:3,600
 1" = 300'



PROJECT: FIRSTENERGY ALIGNED DATA CENTER - PHASE 2 ERIE COUNTY, OH	
TITLE: SOILS MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P18
CHECKED BY: M. MOLNAR	FIGURE 3
APPROVED BY: B. FALKINBURG	
DATE: JANUARY 2026	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDRv2.aprx

Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet; Map Rotation: 0
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- 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).

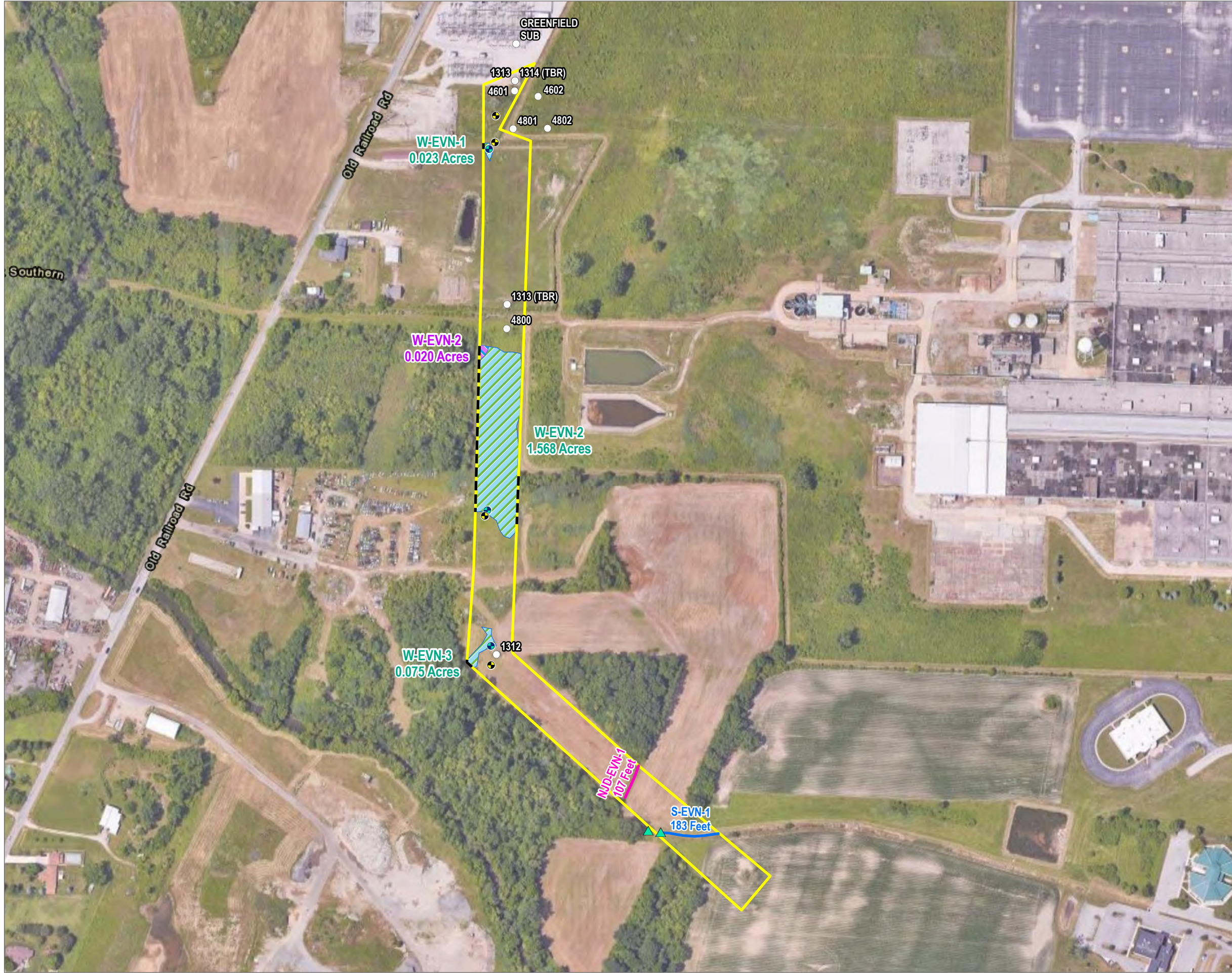


1:3,600
 1" = 300'



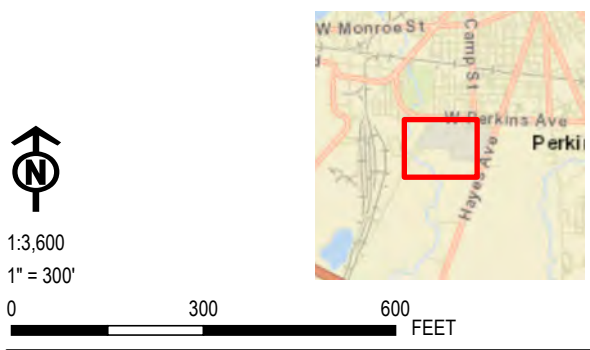
PROJECT: FIRSTENERGY ALIGNED DATA CENTER - PHASE 2 ERIE COUNTY, OH	
TITLE: NHD, NWI AND FEMA FLOODPLAIN MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P18
CHECKED BY: M. MOLNAR	FIGURE 4
APPROVED BY: B. FALKINBURG	
DATE: JANUARY 2026	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDRv2.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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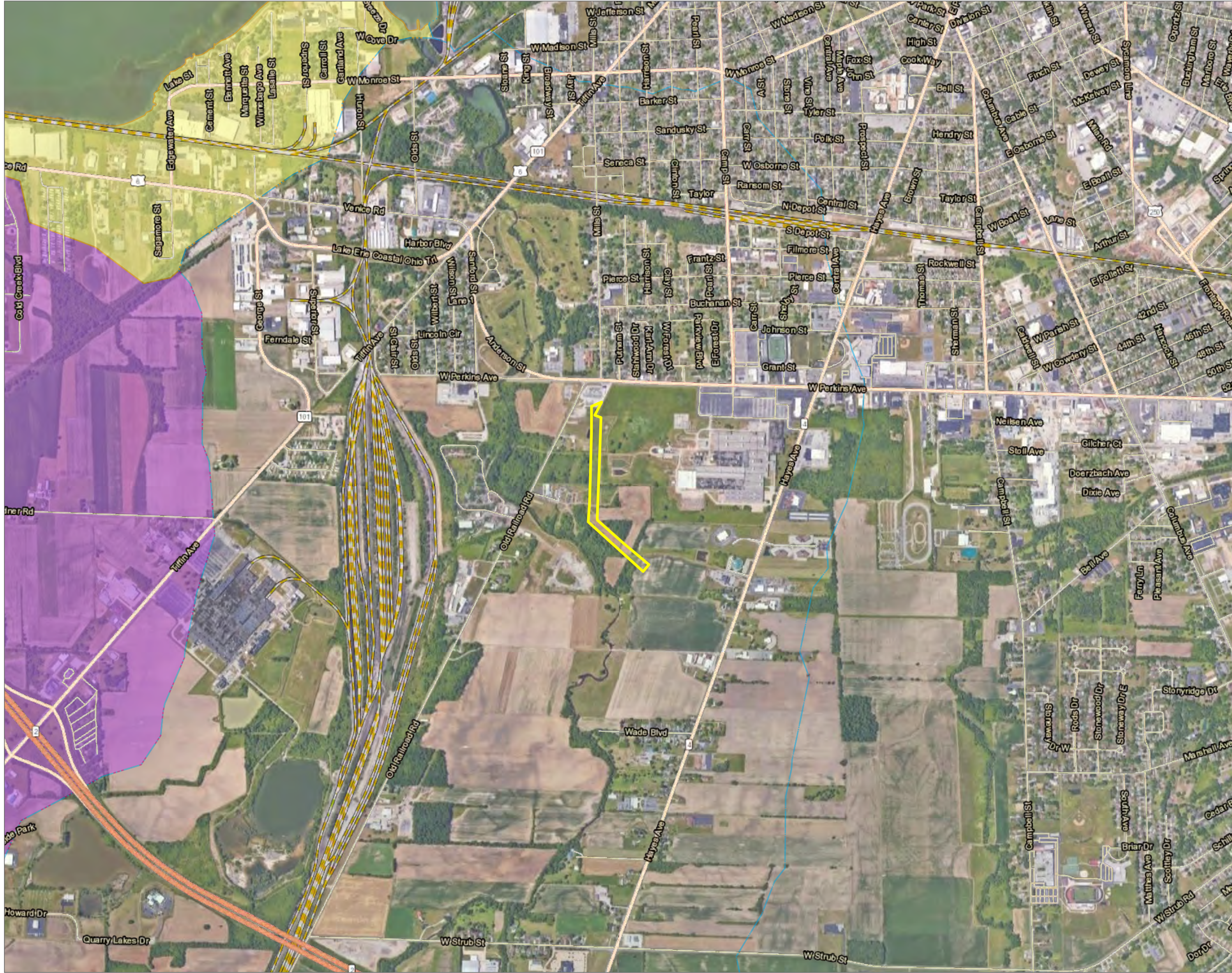
- PROJECT STUDY AREA
- EXISTING STRUCTURE
- CULVERT
- NON-JURISDICTIONAL DRAINAGE
- PERENNIAL STREAM
- PEM WETLAND
- PSS WETLAND
- WETLAND CONTINUES
- WETLAND DATA POINT
- UPLAND DATA POINT

BASE MAP: GOOGLE MAPS.
 DATA SOURCES: TRC WETLAND DELINEATION COMPLETED JANUARY 13, 2026.



PROJECT: FIRSTENERGY ALIGNED DATA CENTER - PHASE 2 ERIE COUNTY, OH	
TITLE: DELINEATED RESOURCES MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P18
CHECKED BY: M. MOLNAR	FIGURE 5
APPROVED BY: B. FALKINBURG	
DATE: JANUARY 2026	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDRv2.aprx

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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.

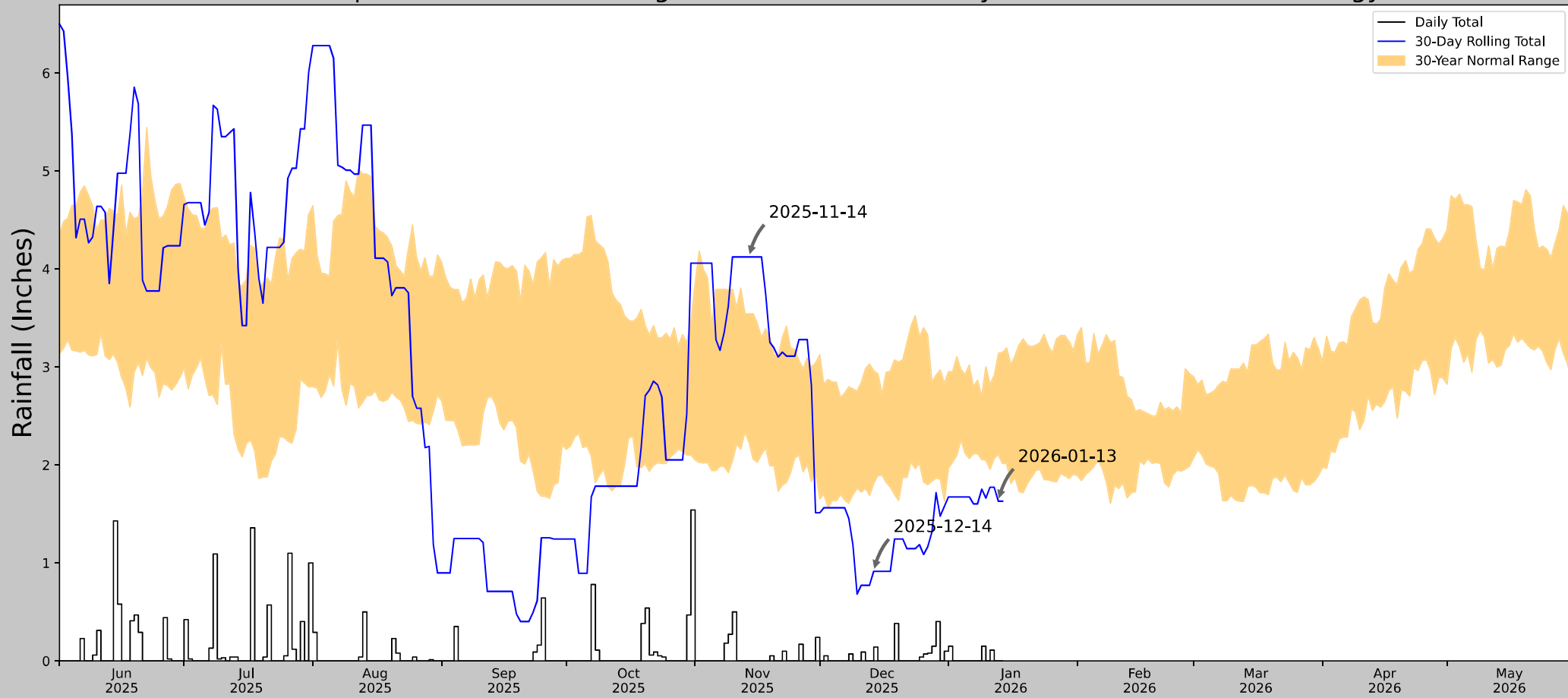


PROJECT:		FIRSTENERGY ALIGNED DATA CENTER - PHASE 2 ERIE COUNTY, OH	
TITLE:		NATIONWIDE PERMITS STREAM ELIGIBILITY MAP	
DRAWN BY:	M. OPEL	PROJ. NO.:	664675 P18
CHECKED BY:	M. MOLNAR	FIGURE 6	
APPROVED BY:	B. FALKINBURG		
DATE:	JANUARY 2026		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:		WDRv2.aprx	

Appendix B

Antecedent Precipitation Tables

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network



Coordinates	41.42868, -82.72576
Observation Date	2026-01-13
Elevation (ft)	598.806
Drought Index (PDSI)	Not available
WebWIMP H ₂ O Balance	Wet Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-01-13	2.104331	3.138583	1.629921	Dry	1	3	3
2025-12-14	1.811024	2.962992	0.913386	Dry	1	2	2
2025-11-14	2.227165	3.54252	4.122047	Wet	3	1	3
Result							Drier than Normal - 8

Figures and tables made by the
Antecedent Precipitation Tool
Version 3.0



Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and
Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
FREMONT	41.3336, -83.1197	600.066	21.453	1.26	9.681	11339	77
FREMONT 0.5 SW	41.3448, -83.1201	628.937	0.774	28.871	0.371	1	0
FREMONT 2.2 ENE	41.3658, -83.0754	608.924	3.198	8.858	1.467	8	13
FREMONT AG STN	41.3119, -83.1719	664.042	3.096	63.976	1.591	5	0

Appendix C

Photographic Record

Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 1.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-1, facing north.



Photo No. 2.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-1, facing east.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 3.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-1, facing south.



Photo No. 4.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-1, facing west.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 5.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-2, facing north.



Photo No. 6.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-2, facing east.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 7.

Photo Date:
11/18/2025

Description:
Representative photo of wetland W-EVN-2, facing south.



Photo No. 8.

Photo Date:
11/18/2025

Description:
Representative photo of the PSS portion of wetland W-EVN-2, facing west.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 9.

Photo Date:
1/13/2026

Description:

 Representative photo of wetland W-EVN-3, facing north.



Photo No. 10.

Photo Date:
1/13/2026

Description:

 Representative photo of wetland W-EVN-3, facing east.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 11.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-3, facing south.



Photo No. 12.

Photo Date:
1/13/2026

Description:
Representative photo of wetland W-EVN-3, facing west.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 13.

Photo Date:
1/13/2026

Description:

Photo of stream S-EVN-1 looking upstream, facing east.



Photo No. 14.

Photo Date:
1/13/2026

Description:

Photo of stream S-EVN-1 looking downstream, facing west.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 15.

Photo Date:
1/13/2026

Description:
Stream S-EVN-1,
showing the
observed substrate.



Photo No. 16.

Photo Date:
1/13/2026

Description:
Representative photo
of the project study
area, facing south.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 17.

Photo Date:
11/18/2025

Description:

 Representative photo of the project study area, facing west.



Photo No. 18.

Photo Date:
1/13/2026

Description:

 Representative photo of the project study area, facing north.



Client Name: FirstEnergy	Site Location: Perkins Township, Erie County, Ohio	Project No.: 664675 Phase 18
------------------------------------	--------------------------------------------------------------	----------------------------------------

Photo No. 19.

Photo Date:
1/13/2026

Description:

 Representative photo of the project study area, facing west.



Photo No. 20.

Photo Date:
1/13/2026

Description:

 Representative photo of project study area, facing north.



Appendix D

Data Forms



**USACE Wetland Determination Data Forms – 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: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-01_PEM-1
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Depression Local relief (concave, convex, none): None Slope (%): 0 to 1
 Subregion (LRR or MLRA): _____ Lat: 41.4317921 Long: -82.7275653 Datum: WGS84
 Soil Map Unit Name: Toledo silty clay, 0 to 1 percent slopes NWI Classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No _____ (If no, explain in Remarks.)
 Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes No _____
 Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No _____	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No _____
Hydric Soil Present? Yes <input checked="" type="checkbox"/> No _____	
Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No _____	If yes, optional Wetland Site ID: <u>W-EVN-01</u>

Remarks: (Explain alternative procedures here or in a separate report.)
 Covertypes 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)	Secondary Indicators (minimum of two required)
<input checked="" type="checkbox"/> Surface Water (A1) _____ <input type="checkbox"/> High Water Table (A2) _____ <input type="checkbox"/> Saturation (A3) _____ <input type="checkbox"/> Water Marks (B1) _____ <input type="checkbox"/> Sediment Deposits (B2) _____ <input type="checkbox"/> Drift Deposits (B3) _____ <input type="checkbox"/> Algal Mat or Crust (B4) _____ <input type="checkbox"/> Iron Deposits (B5) _____ <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) _____ <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8) _____	<input type="checkbox"/> Surface Soil Cracks (B6) _____ <input type="checkbox"/> Drainage Patterns (B10) _____ <input type="checkbox"/> Moss Trim Lines (B16) _____ <input type="checkbox"/> Dry-Season Water Table (C2) _____ <input type="checkbox"/> Crayfish Burrows (C8) _____ <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) _____ <input type="checkbox"/> Stunted or Stressed Plants (D1) _____ <input type="checkbox"/> Geomorphic Position (D2) _____ <input type="checkbox"/> Shallow Aquitard (D3) _____ <input type="checkbox"/> Microtopographic Relief (D4) _____ <input checked="" type="checkbox"/> FAC-Neutral Test (D5) _____
<input type="checkbox"/> Water-Stained Leaves (B9) _____ <input type="checkbox"/> Aquatic Fauna (B13) _____ <input type="checkbox"/> Marl Deposits (B15) _____ <input type="checkbox"/> Hydrogen Sulfide Odor (C1) _____ <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) _____ <input type="checkbox"/> Presence of Reduced Iron (C4) _____ <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) _____ <input type="checkbox"/> Thin Muck Surface (C7) _____ <input type="checkbox"/> Other (Explain in Remarks) _____	

Field Observations: Surface Water Present? Yes <input checked="" type="checkbox"/> No _____ Depth (inches): <u>2</u> Water Table Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> 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: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			

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)

<u>0</u> = Total Cover			
Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>15</u>	x 1 = <u>15</u>
FACW species <u>85</u>	x 2 = <u>170</u>
FAC species <u>0</u>	x 3 = <u>0</u>
FACU species <u>0</u>	x 4 = <u>0</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>100</u> (A)	<u>185</u> (B)

Prevalence Index = B/A = 1.9

<u>0</u> = Total Cover			
Herb Stratum (Plot size: <u>5 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Phalaris arundinacea</i>	85	Yes	FACW
2. <i>Juncus effusus</i>	10	No	OBL
3. <i>Typha angustifolia</i>	5	No	OBL
4. _____			
5. _____			
6. _____			
7. _____			
8. _____			
9. _____			
10. _____			
11. _____			
12. _____			

Hydrophytic Vegetation Indicators:

1 - Rapid Test for Hydrophytic Vegetation

2 - Dominance Test is >50%

3 - Prevalence Index is ≤3.0¹

4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)

Problematic Hydrophytic Vegetation¹ (Explain)

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

<u>100</u> = Total Cover			
Woody Vine Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			

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.

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: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-01 UPL-1
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Flat Local relief (concave, convex, none): None Slope (%): 0 to 1
 Subregion (LRR or MLRA): MLRA 99 of LRR L Lat: 41.4318182833 Long: -82.7275239167 Datum: WGS84
 Soil Map Unit Name: Toledo silty clay, 0 to 1 percent slopes NWI Classification: None
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, optional Wetland Site ID: _____
Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Remarks: (Explain alternative procedures here or in a separate report.)
 Covertypes 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) <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Aquatic Fauna (B13) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Marl Deposits (B15) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	Secondary Indicators (minimum of two required) <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)
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Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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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**

	Absolute % Cover	Dominant Species?	Indicator Status																						
Tree Stratum (Plot size: <u>30 ft radius</u>)				Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0%</u> (A/B)																					
1.																									
2.																									
3.																									
4.																									
5.																									
6.																									
7.																									
<u>0</u> = Total Cover																									
Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)					Prevalence Index worksheet: <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;"></td> <td style="width:25%; text-align: center;">Total % Cover of:</td> <td style="width:25%; text-align: center;">Multiply by:</td> </tr> <tr> <td>OBL species</td> <td style="text-align: center;"><u>0</u></td> <td style="text-align: center;">x 1 = <u>0</u></td> </tr> <tr> <td>FACW species</td> <td style="text-align: center;"><u>0</u></td> <td style="text-align: center;">x 2 = <u>0</u></td> </tr> <tr> <td>FAC species</td> <td style="text-align: center;"><u>0</u></td> <td style="text-align: center;">x 3 = <u>0</u></td> </tr> <tr> <td>FACU species</td> <td style="text-align: center;"><u>100</u></td> <td style="text-align: center;">x 4 = <u>400</u></td> </tr> <tr> <td>UPL species</td> <td style="text-align: center;"><u>0</u></td> <td style="text-align: center;">x 5 = <u>0</u></td> </tr> <tr> <td>Column Totals:</td> <td style="text-align: center;"><u>100</u> (A)</td> <td style="text-align: center;"><u>400</u> (B)</td> </tr> </table> Prevalence Index = B/A = <u>4</u>		Total % Cover of:	Multiply by:	OBL species	<u>0</u>	x 1 = <u>0</u>	FACW species	<u>0</u>	x 2 = <u>0</u>	FAC species	<u>0</u>	x 3 = <u>0</u>	FACU species	<u>100</u>	x 4 = <u>400</u>	UPL species	<u>0</u>	x 5 = <u>0</u>	Column Totals:	<u>100</u> (A)
	Total % Cover of:	Multiply by:																							
OBL species	<u>0</u>	x 1 = <u>0</u>																							
FACW species	<u>0</u>	x 2 = <u>0</u>																							
FAC species	<u>0</u>	x 3 = <u>0</u>																							
FACU species	<u>100</u>	x 4 = <u>400</u>																							
UPL species	<u>0</u>	x 5 = <u>0</u>																							
Column Totals:	<u>100</u> (A)	<u>400</u> (B)																							
1.																									
2.																									
3.																									
4.																									
5.																									
6.																									
7.																									
<u>0</u> = Total Cover																									
Herb Stratum (Plot size: <u>5 ft radius</u>)																									
1.	<i>Poa compressa</i>	55	Yes	FACU																					
2.	<i>Solidago canadensis</i>	20	Yes	FACU																					
3.	<i>Symphyotrichum pilosum</i>	15	No	FACU																					
4.	<i>Dipsacus fullonum</i>	10	No	FACU																					
5.																									
6.																									
7.																									
8.																									
9.																									
10.																									
11.																									
12.																									
<u>100</u> = Total Cover																									
Woody Vine Stratum (Plot size: <u>30 ft radius</u>)				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.																					
1.																									
2.																									
3.																									
4.																									
<u>0</u> = Total Cover																									
				Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/>																					

Remarks: (Include photo numbers here or on a separate sheet.)
 The criterion for hydrophytic vegetation 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: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-02_PEM-1
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Depression Local relief (concave, convex, none): None Slope (%): 0 to 1
 Subregion (LRR or MLRA): MLRA 99 of LRR L Lat: 41.4287001167 Long: -82.7276024333 Datum: WGS84
 Soil Map Unit Name: Fulton silty clay loam, 0 to 2 percent slopes NWI Classification: None
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Hydric Soil Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If yes, optional Wetland Site ID: <u>W-EVN-02</u>

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

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)	
<input checked="" type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Moss Trim Lines (B16)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Stunted or Stressed Plants (D1)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Microtopographic Relief (D4)
	<input checked="" type="checkbox"/> FAC-Neutral Test (D5)

Field Observations: Surface Water Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Depth (inches): <u>1</u> Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u> </u> Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u> </u> (includes capillary fringe)	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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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: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____

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)

0 = Total Cover			
Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>55</u>	x 2 = <u>110</u>
FAC species <u>45</u>	x 3 = <u>135</u>
FACU species <u>0</u>	x 4 = <u>0</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>100</u> (A)	<u>245</u> (B)

Prevalence Index = B/A = 2.5

0 = Total Cover			
Herb Stratum (Plot size: <u>5 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Phragmites australis</i>	35	Yes	FACW
2. <i>Verbena urticifolia</i>	25	Yes	FAC
3. <i>Symphotrichum lateriflorum</i>	20	Yes	FAC
4. <i>Phalaris arundinacea</i>	15	No	FACW
5. <i>Solidago gigantea</i>	5	No	FACW
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
12. _____	_____	_____	_____

Hydrophytic Vegetation Indicators:

 1 - Rapid Test for Hydrophytic Vegetation

2 - Dominance Test is >50%

3 - Prevalence Index is ≤3.0¹

 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)

 Problematic Hydrophytic Vegetation¹ (Explain)

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

100 = Total Cover			
Woody Vine Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____

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.

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: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-02 UPL-1
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Back slope Local relief (concave, convex, none): None Slope (%): 1 to 3
 Subregion (LRR or MLRA): _____ Lat: 41.4286961 Long: -82.7276013167 Datum: WGS84
 Soil Map Unit Name: Fulton silty clay loam, 0 to 2 percent slopes NWI Classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No _____ (If no, explain in Remarks.)
 Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes No _____
 Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>
Hydric Soil Present? Yes _____ No <input checked="" type="checkbox"/>	
Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/>	
If yes, optional Wetland Site ID: _____	

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

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)	
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Moss Trim Lines (B16)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Stunted or Stressed Plants (D1)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Microtopographic Relief (D4)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Aquatic Fauna (B13)	
<input type="checkbox"/> Marl Deposits (B15)	
<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	
<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)	
<input type="checkbox"/> Presence of Reduced Iron (C4)	
<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	
<input type="checkbox"/> Thin Muck Surface (C7)	
<input type="checkbox"/> Other (Explain in Remarks)	

Field Observations:	Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/>
Surface Water Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____	
Water Table Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____	
Saturation Present? Yes _____ No <input checked="" type="checkbox"/> Depth (inches): _____ (includes capillary fringe)	

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: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			
	<u>0</u>	= Total Cover	

Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			
	<u>0</u>	= Total Cover	

Herb Stratum (Plot size: <u>5 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Solidago altissima</i>	25	Yes	FACU
2. <i>Solidago canadensis</i>	25	Yes	FACU
3. <i>Poa compressa</i>	15	Yes	FACU
4. <i>Rosa multiflora</i>	15	Yes	FACU
5. <i>Crataegus crus-galli</i>	10	No	FAC
6. <i>Phalaris arundinacea</i>	10	No	FACW
7. _____			
8. _____			
9. _____			
10. _____			
11. _____			
12. _____			
	<u>100</u>	= Total Cover	

Woody Vine Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
	<u>0</u>	= 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: 4 (B)

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

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>10</u>	x 2 = <u>20</u>
FAC species <u>10</u>	x 3 = <u>30</u>
FACU species <u>80</u>	x 4 = <u>320</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>100</u> (A)	<u>370</u> (B)

Prevalence Index = B/A = 3.7

- Hydrophytic Vegetation Indicators:**
- 1 - Rapid Test for Hydrophytic Vegetation
 - 2 - Dominance Test is >50%
 - 3 - Prevalence Index is ≤3.0¹
 - 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)
 - Problematic Hydrophytic Vegetation¹ (Explain)
- ¹Indicators 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 **X**

Remarks: (Include photo numbers here or on a separate sheet.)
 The criterion for hydrophytic vegetation is not met.

Project/Site: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-03 PEM-1
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Depression Local relief (concave, convex, none): None Slope (%): 0 to 1
 Subregion (LRR or MLRA): MLRA 99 of LRR L Lat: 41.4275689667 Long: -82.7274991833 Datum: WGS84
 Soil Map Unit Name: Fulton silty clay loam, 0 to 2 percent slopes NWI Classification: None
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, optional Wetland Site ID: <u>W-EVN-03</u>
Hydric Soil Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Wetland Hydrology Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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

HYDROLOGY

Wetland Hydrology Indicators:		Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)		
<input checked="" type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Aquatic Fauna (B13)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Marl Deposits (B15)	<input type="checkbox"/> Moss Trim Lines (B16)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Sediment Deposits (B2)	<input checked="" type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> Stunted or Stressed Plants (D1)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Thin Muck Surface (C7)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)		<input type="checkbox"/> Microtopographic Relief (D4)
		<input checked="" type="checkbox"/> FAC-Neutral Test (D5)

Field Observations: Surface Water Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Depth (inches): <u>1</u> Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------

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-03_PEM-1

Tree Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			

	<u>0</u>	= Total Cover	
Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			

	<u>0</u>	= Total Cover	
Herb Stratum (Plot size: <u>5 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Phalaris arundinacea</i>	35	Yes	FACW
2. <i>Verbena urticifolia</i>	25	Yes	FAC
3. <i>Setaria pumila</i>	20	Yes	FAC
4. <i>Bidens frondosa</i>	10	No	FACW
5. <i>Oenothera perennis</i>	10	No	FAC
6. _____			
7. _____			
8. _____			
9. _____			
10. _____			
11. _____			
12. _____			

	<u>100</u>	= Total Cover	
Woody Vine Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			

	<u>0</u>	= Total Cover
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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 <u>0</u>	x 1 = <u>0</u>
FACW species <u>45</u>	x 2 = <u>90</u>
FAC species <u>55</u>	x 3 = <u>165</u>
FACU species <u>0</u>	x 4 = <u>0</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>100</u> (A)	<u>255</u> (B)

Prevalence Index = B/A = 2.6

Hydrophytic Vegetation Indicators:

 1 - Rapid Test for Hydrophytic Vegetation

2 - Dominance Test is >50%

3 - Prevalence Index is ≤3.0¹

 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)

 Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators 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.

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: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: W-EVN-03 UPL-1
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Flat Local relief (concave, convex, none): None Slope (%): 0 to 1
 Subregion (LRR or MLRA): MLRA 99 of LRR L Lat: 41.4274379 Long: -82.72753305 Datum: WGS84
 Soil Map Unit Name: Fulton silty clay loam, 0 to 2 percent slopes NWI Classification: None
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Hydric Soil Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, optional Wetland Site ID: _____	

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

HYDROLOGY

Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)	
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Moss Trim Lines (B16)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Stunted or Stressed Plants (D1)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Microtopographic Relief (D4)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Aquatic Fauna (B13)	
<input type="checkbox"/> Marl Deposits (B15)	
<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	
<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)	
<input type="checkbox"/> Presence of Reduced Iron (C4)	
<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	
<input type="checkbox"/> Thin Muck Surface (C7)	
<input type="checkbox"/> Other (Explain in Remarks)	

Field Observations:	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	
Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	
Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ (includes capillary fringe)	

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-03_UPL-1

Tree Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			

	<u>0</u>	= Total Cover	
Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			

	<u>0</u>	= Total Cover	
Herb Stratum (Plot size: <u>5 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Zea mays</u>	75	Yes	UPL
2. <u>Glechoma hederacea</u>	15	No	FACU
3. <u>Setaria pumila</u>	10	No	FAC
4. _____			
5. _____			
6. _____			
7. _____			
8. _____			
9. _____			
10. _____			
11. _____			
12. _____			

	<u>100</u>	= Total Cover	
Woody Vine Stratum (Plot size: <u>30 ft radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			

	<u>0</u>	= Total Cover
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Dominance Test worksheet:

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

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

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

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>0</u>	x 2 = <u>0</u>
FAC species <u>10</u>	x 3 = <u>30</u>
FACU species <u>15</u>	x 4 = <u>60</u>
UPL species <u>75</u>	x 5 = <u>375</u>
Column Totals: <u>100</u> (A)	<u>465</u> (B)

Prevalence Index = B/A = 4.7

Hydrophytic Vegetation Indicators:

 1 - Rapid Test for Hydrophytic Vegetation

 2 - Dominance Test is >50%

 3 - Prevalence Index is ≤3.0¹

 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)

 Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators 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 **X**

Remarks: (Include photo numbers here or on a separate sheet.)
 The criterion for hydrophytic vegetation 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: Aligned Data Center Phase 2 City/County: Perkins Twnshp, Erie Cnty Sampling Date: 2026-1-13
 Applicant/Owner: FirstEnergy State: OH Sampling Point: U-EVN-01
 Investigator(s): Erin Van Nort, Talon Cline Section, Township, Range: Perkins Township
 Landform (hillslope, terrace, etc): Depression Local relief (concave, convex, none): None Slope (%): 0 to 1
 Subregion (LRR or MLRA): MLRA 99 of LRR L Lat: 41.4320611333 Long: -82.7275066667 Datum: WGS84
 Soil Map Unit Name: Toledo silty clay, 0 to 1 percent slopes NWI Classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, optional Wetland Site ID: _____
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Remarks: (Explain alternative procedures here or in a separate report.)
 Covertypes is UPL. Based on the absence of two of three parameters, this area is an upland.

HYDROLOGY

Wetland Hydrology Indicators: Primary Indicators (minimum of one is required; check all that apply) <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Aquatic Fauna (B13) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Marl Deposits (B15) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	Secondary Indicators (minimum of two required) <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input checked="" type="checkbox"/> FAC-Neutral Test (D5)
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Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ (includes capillary fringe)	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------

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: U-EVN-01

	Absolute % Cover	Dominant Species?	Indicator Status																																				
Tree Stratum (Plot size: <u>30 ft radius</u>)				Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>3</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100%</u> (A/B)																																			
1.																																							
2.																																							
3.																																							
4.																																							
5.																																							
6.																																							
7.																																							
<u>0</u> = Total Cover				Prevalence Index worksheet: <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:40%;"></th> <th style="width:10%;">Total % Cover of:</th> <th style="width:10%;"></th> <th style="width:10%;">Multiply by:</th> <th style="width:10%;"></th> </tr> </thead> <tbody> <tr> <td>OBL species</td> <td><u>0</u></td> <td>x 1 =</td> <td><u>0</u></td> <td></td> </tr> <tr> <td>FACW species</td> <td><u>60</u></td> <td>x 2 =</td> <td><u>120</u></td> <td></td> </tr> <tr> <td>FAC species</td> <td><u>20</u></td> <td>x 3 =</td> <td><u>60</u></td> <td></td> </tr> <tr> <td>FACU species</td> <td><u>20</u></td> <td>x 4 =</td> <td><u>80</u></td> <td></td> </tr> <tr> <td>UPL species</td> <td><u>0</u></td> <td>x 5 =</td> <td><u>0</u></td> <td></td> </tr> <tr> <td>Column Totals:</td> <td><u>100</u> (A)</td> <td></td> <td><u>260</u> (B)</td> <td></td> </tr> </tbody> </table> Prevalence Index = B/A = <u>2.6</u>		Total % Cover of:		Multiply by:		OBL species	<u>0</u>	x 1 =	<u>0</u>		FACW species	<u>60</u>	x 2 =	<u>120</u>		FAC species	<u>20</u>	x 3 =	<u>60</u>		FACU species	<u>20</u>	x 4 =	<u>80</u>		UPL species	<u>0</u>	x 5 =	<u>0</u>		Column Totals:	<u>100</u> (A)		<u>260</u> (B)	
	Total % Cover of:		Multiply by:																																				
OBL species	<u>0</u>	x 1 =	<u>0</u>																																				
FACW species	<u>60</u>	x 2 =	<u>120</u>																																				
FAC species	<u>20</u>	x 3 =	<u>60</u>																																				
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Column Totals:	<u>100</u> (A)		<u>260</u> (B)																																				
Sapling/Shrub Stratum (Plot size: <u>15 ft radius</u>)																																							
1.																																							
2.																																							
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6.																																							
7.																																							
<u>0</u> = Total Cover																																							
Herb Stratum (Plot size: <u>5 ft radius</u>)				Hydrophytic Vegetation Indicators: ___ 1 - Rapid Test for Hydrophytic Vegetation <input checked="" type="checkbox"/> 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.																																			
1.	<i>Bidens frondosa</i>	25	Yes		FACW																																		
2.	<i>Symphyotrichum lanceolatum</i>	25	Yes		FACW																																		
3.	<i>Setaria pumila</i>	20	Yes		FAC																																		
4.	<i>Epilobium hirsutum</i>	10	No		FACW																																		
5.	<i>Poa compressa</i>	10	No		FACU																																		
6.	<i>Solidago canadensis</i>	5	No		FACU																																		
7.	<i>Dipsacus fullonum</i>	5	No		FACU																																		
8.																																							
9.																																							
10.																																							
11.																																							
12.																																							
<u>100</u> = Total Cover																																							
Woody Vine Stratum (Plot size: <u>30 ft radius</u>)				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.																																			
1.																																							
2.																																							
3.																																							
4.																																							
<u>0</u> = Total Cover																																							
				Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>																																			

Remarks: (Include photo numbers here or on a separate sheet.)
 The criterion for hydrophytic vegetation is not met.

OEPA ORAM Field Forms

Background Information

Name: Erin Van Nort, Talon Cline	
Date: 1/13/2026	
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-01	
Vegetation Communit(ies): PEM	
HGM Class(es): Depression	
Location of Wetland: include map, address, north arrow, landmarks, distances, roads, etc. See Figure 5: Delineated Resources Map and Surface Water Delineation Report for further details.	
Lat/Long or UTM Coordinate	41.431798, -82.727599
USGS Quad Name	Sandusky
County	Erie
Township	Perkins
Section and Subsection	N/A
Hydrologic Unit Code	041000110103
Site Visit	01/13/2026
National Wetland Inventory Map	See Report
Ohio Wetland Inventory Map	See Report
Soil Survey	See Report
Delineation report/map	See Report

Name of Wetland: W-EVN-01	
Wetland Size (acres, hectares):	~0.023-acre (0.009 hectare)
Sketch: Include north arrow, relationship with other surface waters, vegetation zones, etc. See Figure 5: Delineated Resources Map and Surface Water Delineation Report for further details.	
Comments, Narrative Discussion, Justification of Category Changes:	
Final score : 8	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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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 <i>Phalaris arundinacea</i> , <i>Lythrum salicaria</i> , or <i>Phragmites australis</i> , 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	<input checked="" type="radio"/> 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 <i>Sphagnum</i> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	Oak Opening species	wet prairie species
<i>Lythrum salicaria</i>	<i>Zygadenus elegans</i> var. <i>glaucus</i>	<i>Calla palustris</i>	<i>Carex cryptolepis</i>	<i>Calamagrostis canadensis</i>
<i>Myriophyllum spicatum</i>	<i>Cacalia plantaginea</i>	<i>Carex atlantica</i> var. <i>capillacea</i>	<i>Carex lasiocarpa</i>	<i>Calamagrostis stricta</i>
<i>Najas minor</i>	<i>Carex flava</i>	<i>Carex echinata</i>	<i>Carex stricta</i>	<i>Carex atherodes</i>
<i>Phalaris arundinacea</i>	<i>Carex sterilis</i>	<i>Carex oligosperma</i>	<i>Cladium mariscoides</i>	<i>Carex buxbaumii</i>
<i>Phragmites australis</i>	<i>Carex stricta</i>	<i>Carex trisperma</i>	<i>Calamagrostis stricta</i>	<i>Carex pellita</i>
<i>Potamogeton crispus</i>	<i>Deschampsia caespitosa</i>	<i>Chamaedaphne calyculata</i>	<i>Calamagrostis canadensis</i>	<i>Carex sartwellii</i>
<i>Ranunculus ficaria</i>	<i>Eleocharis rostellata</i>	<i>Decodon verticillatus</i>	<i>Quercus palustris</i>	<i>Gentiana andrewsii</i>
<i>Rhamnus frangula</i>	<i>Eriophorum viridicarinarum</i>	<i>Eriophorum virginicum</i>		<i>Helianthus grosseserratus</i>
<i>Typha angustifolia</i>	<i>Gentianopsis</i> spp.	<i>Larix laricina</i>		<i>Liatris spicata</i>
<i>Typha xglauca</i>	<i>Lobelia kalmii</i>	<i>Nemopanthus mucronatus</i>		<i>Lysimachia quadriflora</i>
	<i>Parnassia glauca</i>	<i>Scheuchzeria palustris</i>		<i>Lythrum alatum</i>
	<i>Potentilla fruticosa</i>	<i>Sphagnum</i> spp.		<i>Pycnanthemum virginianum</i>
	<i>Rhamnus alnifolia</i>	<i>Vaccinium macrocarpon</i>		<i>Silphium terebinthinaceum</i>
	<i>Rhynchospora capillacea</i>	<i>Vaccinium corymbosum</i>		<i>Sorghastrum nutans</i>
	<i>Salix candida</i>	<i>Vaccinium oxycoccos</i>		<i>Spartina pectinata</i>
	<i>Salix myricoides</i>	<i>Woodwardia virginica</i>		<i>Solidago riddellii</i>
	<i>Salix serissima</i>	<i>Xyris difformis</i>		
	<i>Solidago ohioensis</i>			
	<i>Tofieldia glutinosa</i>			
	<i>Triglochin maritimum</i>			
	<i>Triglochin palustre</i>			

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

Site: FirstEnergy, Aligned Data Center Phase 2 Rater(s): Erin Van Nort, Talon Cline Date: 2026-01-13

0 0 max 6 pts. subtotal

Metric 1. Wetland Area (size).

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)
0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
x <0.1 acres (0.04ha) (0 pts)

1 1 max 14 pts. subtotal

Metric 2. Upland buffers and surrounding land use.

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)

7 8 max 30 pts. subtotal

Metric 3. Hydrology.

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)
Regularly inundated/saturated (3)
Seasonally inundated (2)
x 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 filling/grading
dike road bed/RR track
weir dredging
x stormwater input other

4 12 max 20 pts. subtotal

Metric 4. Habitat Alteration and Development.

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)
Recovering (3)
x Recent or no recovery (1)

Check all disturbances observed
mowing shrub/sapling removal
grazing herbaceous/aquatic bed removal
clearcutting sedimentation
selective cutting dredging
woody debris removal farming
toxic pollutants nutrient enrichment

12 subtotal this page

Site: FirstEnergy, Aligned Data Center Phase 2	Rater(s): Erin Van Nort, Talon Cline	Date: 2026-01-13
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12

subtotal first page

0

12

max 10 pts. subtotal

Metric 5. Special Wetlands.

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)

-4

8

max 20 pts. subtotal

Metric 6. Plant communities, interspersions, microtopography.

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)
- None (0)

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

- 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.

- Vegetated hummocks/tussucks
- Coarse woody debris >15cm (6in)
- Standing dead >25cm (10in) dbh
- 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

Invasive Species Present:

narrow-leaved cattail

reed canary grass

8

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 <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 2. Threatened or Endangered Species	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 3. High Quality Natural Wetland	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 4. Significant bird habitat	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 5. Category 1 Wetlands	YES <input checked="" type="radio"/> NO	If yes, Category 1.
	Question 6. Bogs	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 7. Fens	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 8a. Old Growth Forest	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 8b. Mature Forested Wetland	YES <input checked="" type="radio"/> NO	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9b. Lake Erie Wetlands - Restricted	YES <input checked="" type="radio"/> 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 <input checked="" type="radio"/> NO	If yes, Category 3
Question 11. Relict Wet Prairies	YES <input checked="" type="radio"/> NO	If yes, evaluate for Category 3; may also be 1 or 2.	
Quantitative Rating	Metric 1. Size	0	
	Metric 2. Buffers and surrounding land use	1	
	Metric 3. Hydrology	7	
	Metric 4. Habitat	4	
	Metric 5. Special Wetland Communities	0	
	Metric 6. Plant communities, interspersions, microtopography	-4	
	TOTAL SCORE	8	Category based on score breakpoints Cat 1

Complete Wetland Categorization Worksheet.

Wetland Categorization Worksheet

Choices	Circle one	Evaluation of Categorization Result of ORAM
<p>Did you answer "Yes" to any of the following questions:</p> <p>Narrative Rating Nos. 2, 3, 4, 6, 7, 8a, 9d, 10</p>	<p>YES</p> <p>Wetland is categorized as a Category 3 wetland</p>	<p><input checked="" type="radio"/> NO</p> <p>Is quantitative rating score <i>less</i> than the Category 2 scoring threshold (<i>excluding</i> 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</p>
<p>Did you answer "Yes" to any of the following questions:</p> <p>Narrative Rating Nos. 1, 8b, 9b, 9e, 11</p>	<p>YES</p> <p>Wetland should be evaluated for possible Category 3 status</p>	<p><input checked="" type="radio"/> NO</p> <p>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.</p>
<p>Did you answer "Yes" to</p> <p>Narrative Rating No. 5</p>	<p>YES</p> <p>Wetland is categorized as a Category 1 wetland</p>	<p><input checked="" type="radio"/> NO</p> <p>Is quantitative rating score <i>greater</i> than the Category 2 scoring threshold (<i>including</i> 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</p>
<p>Does the quantitative score fall within the scoring range of a Category 1, 2, or 3 wetland?</p>	<p><input checked="" type="radio"/> YES</p> <p>Wetland is assigned to the appropriate category based on the scoring range</p>	<p>NO</p> <p>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.</p>
<p>Does the quantitative score fall with the "gray zone" for Category 1 or 2 or Category 2 or 3 wetlands?</p>	<p>YES</p> <p>Wetland is assigned to the higher of the two categories or assigned to a category based on detailed assessments and the narrative criteria</p>	<p><input checked="" type="radio"/> NO</p> <p>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).</p>
<p>Does the wetland otherwise exhibit <i>moderate OR superior</i> hydrologic OR habitat, OR recreational functions AND the wetland was <i>not</i> 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?</p>	<p>YES</p> <p>Wetland was undercategorized by this method. A written justification for recategorization should be provided on Background Information Form</p>	<p><input checked="" type="radio"/> NO</p> <p>Wetland is assigned to category as determined by the ORAM.</p> <p>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.</p>

Final Category

Choose one
 Category 1
 Category 2
 Category 3

End of Ohio Rapid Assessment Method for Wetlands.

Background Information

Name: Erin Van Nort, Talon Cline	
Date: 1/13/2026	
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-02	
Vegetation Communit(ies): PEM,PSS	
HGM Class(es): Depression	
Location of Wetland: include map, address, north arrow, landmarks, distances, roads, etc. See Figure 5: Delineated Resources Map and Surface Water Delineation Report for further details.	
Lat/Long or UTM Coordinate	41.429432, -82.727522
USGS Quad Name	Sandusky
County	Erie
Township	Perkins
Section and Subsection	N/A
Hydrologic Unit Code	041000110103
Site Visit	01/13/2026
National Wetland Inventory Map	See Report
Ohio Wetland Inventory Map	See Report
Soil Survey	See Report
Delineation report/map	See Report

Name of Wetland: W-EVN-02	
Wetland Size (acres, hectares):	~2.780 acres (1.125 hectare)
Sketch: Include north arrow, relationship with other surface waters, vegetation zones, etc. See Figure 5: Delineated Resources Map and Surface Water Delineation Report for further details.	
Comments, Narrative Discussion, Justification of Category Changes:	
Final score : 27	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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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 <i>Phalaris arundinacea</i> , <i>Lythrum salicaria</i> , or <i>Phragmites australis</i> , 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	<input checked="" type="radio"/> 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 <i>Sphagnum</i> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	Oak Opening species	wet prairie species
<i>Lythrum salicaria</i>	<i>Zygadenus elegans var. glaucus</i>	<i>Calla palustris</i>	<i>Carex cryptolepis</i>	<i>Calamagrostis canadensis</i>
<i>Myriophyllum spicatum</i>	<i>Cacalia plantaginea</i>	<i>Carex atlantica var. capillacea</i>	<i>Carex lasiocarpa</i>	<i>Calamagrostis stricta</i>
<i>Najas minor</i>	<i>Carex flava</i>	<i>Carex echinata</i>	<i>Carex stricta</i>	<i>Carex atherodes</i>
<i>Phalaris arundinacea</i>	<i>Carex sterilis</i>	<i>Carex oligosperma</i>	<i>Cladium mariscoides</i>	<i>Carex buxbaumii</i>
<i>Phragmites australis</i>	<i>Carex stricta</i>	<i>Carex trisperma</i>	<i>Calamagrostis stricta</i>	<i>Carex pellita</i>
<i>Potamogeton crispus</i>	<i>Deschampsia caespitosa</i>	<i>Chamaedaphne calyculata</i>	<i>Calamagrostis canadensis</i>	<i>Carex sartwellii</i>
<i>Ranunculus ficaria</i>	<i>Eleocharis rostellata</i>	<i>Decodon verticillatus</i>	<i>Quercus palustris</i>	<i>Gentiana andrewsii</i>
<i>Rhamnus frangula</i>	<i>Eriophorum viridicarinarum</i>	<i>Eriophorum virginicum</i>		<i>Helianthus grosseserratus</i>
<i>Typha angustifolia</i>	<i>Gentianopsis spp.</i>	<i>Larix laricina</i>		<i>Liatris spicata</i>
<i>Typha xglauca</i>	<i>Lobelia kalmii</i>	<i>Nemopanthus mucronatus</i>		<i>Lysimachia quadriflora</i>
	<i>Parnassia glauca</i>	<i>Scheuchzeria palustris</i>		<i>Lythrum alatum</i>
	<i>Potentilla fruticosa</i>	<i>Sphagnum spp.</i>		<i>Pycnanthemum virginianum</i>
	<i>Rhamnus alnifolia</i>	<i>Vaccinium macrocarpon</i>		<i>Silphium terebinthinaceum</i>
	<i>Rhynchospora capillacea</i>	<i>Vaccinium corymbosum</i>		<i>Sorghastrum nutans</i>
	<i>Salix candida</i>	<i>Vaccinium oxycoccos</i>		<i>Spartina pectinata</i>
	<i>Salix myricoides</i>	<i>Woodwardia virginica</i>		<i>Solidago riddellii</i>
	<i>Salix serissima</i>	<i>Xyris difformis</i>		
	<i>Solidago ohioensis</i>			
	<i>Tofieldia glutinosa</i>			
	<i>Triglochin maritimum</i>			
	<i>Triglochin palustre</i>			

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

Site: FirstEnergy, Aligned Data Center Phase 2 Rater(s): Erin Van Nort, Talon Cline Date: 2026-01-13

2 2 max 6 pts. subtotal

Metric 1. Wetland Area (size).

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)
[X] 0.3 to <3 acres (0.12 to <1.2ha) (2pts)
0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
<0.1 acres (0.04ha) (0 pts)

9 11 max 14 pts. subtotal

Metric 2. Upland buffers and surrounding land use.

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)
[X] 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)
[] 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)
[X] LOW. Old field (>10 years), shrub land, young second growth forest. (5)
[] MODERATELY HIGH. Residential, fenced pasture, park, conservation tillage, new fallow field. (3)
[] HIGH. Urban, industrial, open pasture, row cropping, mining, construction. (1)

8 19 max 30 pts. subtotal

Metric 3. Hydrology.

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)
[] Regularly inundated/saturated (3)
[X] 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, tile, dike, weir, stormwater input, point source (nonstormwater), filling/grading, road bed/RR track, dredging, other

8 27 max 20 pts. subtotal

Metric 4. Habitat Alteration and Development.

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)
[X] Fair (3)
[] Poor to fair (2)
[] 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
mowing, grazing, clearcutting, selective cutting, woody debris removal, toxic pollutants, shrub/sapling removal, herbaceous/aquatic bed removal, sedimentation, dredging, farming, nutrient enrichment

27 subtotal this page

Site: FirstEnergy, Aligned Data Center Phase 2	Rater(s): Erin Van Nort, Talon Cline	Date: 2026-01-13
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27

subtotal first page

0	27
max 10 pts.	subtotal

Metric 5. Special Wetlands.

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)

0	27
max 20 pts.	subtotal

Metric 6. Plant communities, interspersions, microtopography.

6a. Wetland Vegetation Communities.

Score all present using 0 to 3 scale.

- Aquatic Bed
- 1 Emergent
- 1 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)
- None (0)

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

- 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.

- 1 Vegetated hummocks/tussucks
- Coarse woody debris >15cm (6in)
- Standing dead >25cm (10in) dbh
- 1 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

Invasive Species Present:

phragmites

reed canary grass

27

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 <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 2. Threatened or Endangered Species	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 3. High Quality Natural Wetland	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 4. Significant bird habitat	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 5. Category 1 Wetlands	YES <input checked="" type="radio"/> NO	If yes, Category 1.
	Question 6. Bogs	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 7. Fens	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 8a. Old Growth Forest	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 8b. Mature Forested Wetland	YES <input checked="" type="radio"/> NO	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9b. Lake Erie Wetlands - Restricted	YES <input checked="" type="radio"/> 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 <input checked="" type="radio"/> NO	If yes, Category 3
Question 11. Relict Wet Prairies	YES <input checked="" type="radio"/> NO	If yes, evaluate for Category 3; may also be 1 or 2.	
Quantitative Rating	Metric 1. Size	2	
	Metric 2. Buffers and surrounding land use	9	
	Metric 3. Hydrology	8	
	Metric 4. Habitat	8	
	Metric 5. Special Wetland Communities	0	
	Metric 6. Plant communities, interspersions, microtopography	0	
	TOTAL SCORE	27	Category based on score breakpoints Cat 1

Complete Wetland Categorization Worksheet.

Wetland Categorization Worksheet

Choices	Circle one	Evaluation of Categorization Result of ORAM
<p>Did you answer "Yes" to any of the following questions:</p> <p>Narrative Rating Nos. 2, 3, 4, 6, 7, 8a, 9d, 10</p>	<p>YES</p> <p>Wetland is categorized as a Category 3 wetland</p>	<p>NO</p> <p>Is quantitative rating score <i>less</i> than the Category 2 scoring threshold (<i>excluding</i> 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</p>
<p>Did you answer "Yes" to any of the following questions:</p> <p>Narrative Rating Nos. 1, 8b, 9b, 9e, 11</p>	<p>YES</p> <p>Wetland should be evaluated for possible Category 3 status</p>	<p>NO</p> <p>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.</p>
<p>Did you answer "Yes" to</p> <p>Narrative Rating No. 5</p>	<p>YES</p> <p>Wetland is categorized as a Category 1 wetland</p>	<p>NO</p> <p>Is quantitative rating score <i>greater</i> than the Category 2 scoring threshold (<i>including</i> 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</p>
<p>Does the quantitative score fall within the scoring range of a Category 1, 2, or 3 wetland?</p>	<p>YES</p> <p>Wetland is assigned to the appropriate category based on the scoring range</p>	<p>NO</p> <p>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.</p>
<p>Does the quantitative score fall with the "gray zone" for Category 1 or 2 or Category 2 or 3 wetlands?</p>	<p>YES</p> <p>Wetland is assigned to the higher of the two categories or assigned to a category based on detailed assessments and the narrative criteria</p>	<p>NO</p> <p>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).</p>
<p>Does the wetland otherwise exhibit <i>moderate OR superior</i> hydrologic OR habitat, OR recreational functions AND the wetland was <i>not</i> 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?</p>	<p>YES</p> <p>Wetland was undercategorized by this method. A written justification for recategorization should be provided on Background Information Form</p>	<p>NO</p> <p>Wetland is assigned to category as determined by the ORAM.</p> <p>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.</p>

Final Category

Choose one
Category 1
Category 2
Category 3

End of Ohio Rapid Assessment Method for Wetlands.

Background Information

Name: Erin Van Nort, Talon Cline	
Date: 1/13/2026	
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-03	
Vegetation Communit(ies): PEM	
HGM Class(es): Depression	
Location of Wetland: include map, address, north arrow, landmarks, distances, roads, etc. See Figure 5: Delineated Resources Map and Surface Water Delineation Report for further details.	
Lat/Long or UTM Coordinate	41.427595, -82.727579
USGS Quad Name	Sandusky
County	Erie
Township	Perkins
Section and Subsection	N/A
Hydrologic Unit Code	041000110103
Site Visit	01/13/2026
National Wetland Inventory Map	See Report
Ohio Wetland Inventory Map	See Report
Soil Survey	See Report
Delineation report/map	See Report

Name of Wetland: W-EVN-03	
Wetland Size (acres, hectares):	~0.183-acre (0.074 hectare)
Sketch: Include north arrow, relationship with other surface waters, vegetation zones, etc. See Figure 5: Delineated Resources Map and Surface Water Delineation Report for further details.	
Comments, Narrative Discussion, Justification of Category Changes:	
Final score : 5	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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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 <i>Phalaris arundinacea</i> , <i>Lythrum salicaria</i> , or <i>Phragmites australis</i> , 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	<input checked="" type="radio"/> 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 <i>Sphagnum</i> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	<input checked="" type="radio"/> 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	Oak Opening species	wet prairie species
<i>Lythrum salicaria</i>	<i>Zygadenus elegans var. glaucus</i>	<i>Calla palustris</i>	<i>Carex cryptolepis</i>	<i>Calamagrostis canadensis</i>
<i>Myriophyllum spicatum</i>	<i>Cacalia plantaginea</i>	<i>Carex atlantica var. capillacea</i>	<i>Carex lasiocarpa</i>	<i>Calamagrostis stricta</i>
<i>Najas minor</i>	<i>Carex flava</i>	<i>Carex echinata</i>	<i>Carex stricta</i>	<i>Carex atherodes</i>
<i>Phalaris arundinacea</i>	<i>Carex sterilis</i>	<i>Carex oligosperma</i>	<i>Cladium mariscoides</i>	<i>Carex buxbaumii</i>
<i>Phragmites australis</i>	<i>Carex stricta</i>	<i>Carex trisperma</i>	<i>Calamagrostis stricta</i>	<i>Carex pellita</i>
<i>Potamogeton crispus</i>	<i>Deschampsia caespitosa</i>	<i>Chamaedaphne calyculata</i>	<i>Calamagrostis canadensis</i>	<i>Carex sartwellii</i>
<i>Ranunculus ficaria</i>	<i>Eleocharis rostellata</i>	<i>Decodon verticillatus</i>	<i>Quercus palustris</i>	<i>Gentiana andrewsii</i>
<i>Rhamnus frangula</i>	<i>Eriophorum viridicarinarum</i>	<i>Eriophorum virginicum</i>		<i>Helianthus grosseserratus</i>
<i>Typha angustifolia</i>	<i>Gentianopsis spp.</i>	<i>Larix laricina</i>		<i>Liatris spicata</i>
<i>Typha xglauca</i>	<i>Lobelia kalmii</i>	<i>Nemopanthus mucronatus</i>		<i>Lysimachia quadriflora</i>
	<i>Parnassia glauca</i>	<i>Scheuchzeria palustris</i>		<i>Lythrum alatum</i>
	<i>Potentilla fruticosa</i>	<i>Sphagnum spp.</i>		<i>Pycnanthemum virginianum</i>
	<i>Rhamnus alnifolia</i>	<i>Vaccinium macrocarpon</i>		<i>Silphium terebinthinaceum</i>
	<i>Rhynchospora capillacea</i>	<i>Vaccinium corymbosum</i>		<i>Sorghastrum nutans</i>
	<i>Salix candida</i>	<i>Vaccinium oxycoccos</i>		<i>Spartina pectinata</i>
	<i>Salix myricoides</i>	<i>Woodwardia virginica</i>		<i>Solidago riddellii</i>
	<i>Salix serissima</i>	<i>Xyris difformis</i>		
	<i>Solidago ohioensis</i>			
	<i>Tofieldia glutinosa</i>			
	<i>Triglochin maritimum</i>			
	<i>Triglochin palustre</i>			

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

Site: FirstEnergy, Aligned Data Center Phase 2	Rater(s): Erin Van Nort, Talon Cline	Date: 2026-01-13
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0	0
max 6 pts.	subtotal

Metric 1. Wetland Area (size).

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)
- 0.1 to <0.3 acres (0.04 to <0.12ha) (1 pt)
- <0.1 acres (0.04ha) (0 pts)

1	1
max 14 pts.	subtotal

Metric 2. Upland buffers and surrounding land use.

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)
- 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)
- HIGH. Urban, industrial, open pasture, row cropping, mining, construction. (1)

5	6
max 30 pts.	subtotal

Metric 3. Hydrology.

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

- High pH groundwater (5)
- Other groundwater (3)
- 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)
- 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)
- <0.4 m (<15.7 in) (1)

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

- Semi- to permanently inundated/saturated (4)
- 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)
- Recovering (3)
- Recent or no recovery (1)

Check all disturbances observed	
<input checked="" type="checkbox"/> ditch	<input type="checkbox"/> point source (nonstormwater)
<input type="checkbox"/> tile	<input checked="" type="checkbox"/> filling/grading
<input type="checkbox"/> dike	<input type="checkbox"/> road bed/RR track
<input type="checkbox"/> weir	<input type="checkbox"/> dredging
<input type="checkbox"/> stormwater input	<input type="checkbox"/> other

3	9
max 20 pts.	subtotal

Metric 4. Habitat Alteration and Development.

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

- None or none apparent (4)
- Recovered (3)
- 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)
- Poor (1)

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

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

Check all disturbances observed	
<input checked="" type="checkbox"/> mowing	<input type="checkbox"/> shrub/sapling removal
<input type="checkbox"/> grazing	<input type="checkbox"/> herbaceous/aquatic bed removal
<input type="checkbox"/> clearcutting	<input type="checkbox"/> sedimentation
<input type="checkbox"/> selective cutting	<input type="checkbox"/> dredging
<input type="checkbox"/> woody debris removal	<input checked="" type="checkbox"/> farming
<input type="checkbox"/> toxic pollutants	<input type="checkbox"/> nutrient enrichment

9
subtotal this page

Site: FirstEnergy, Aligned Data Center Phase 2	Rater(s): Erin Van Nort, Talon Cline	Date: 2026-01-13
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9

subtotal first page

0	9
max 10 pts.	subtotal

Metric 5. Special Wetlands.

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)

-4	5
max 20 pts.	subtotal

Metric 6. Plant communities, interspersions, microtopography.

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)
- None (0)

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

- 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.

- Vegetated hummocks/tussucks
- Coarse woody debris >15cm (6in)
- Standing dead >25cm (10in) dbh
- 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

Invasive Species Present:

reed canary grass

5

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 <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 2. Threatened or Endangered Species	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 3. High Quality Natural Wetland	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 4. Significant bird habitat	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 5. Category 1 Wetlands	YES <input checked="" type="radio"/> NO	If yes, Category 1.
	Question 6. Bogs	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 7. Fens	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 8a. Old Growth Forest	YES <input checked="" type="radio"/> NO	If yes, Category 3.
	Question 8b. Mature Forested Wetland	YES <input checked="" type="radio"/> NO	If yes, evaluate for Category 3; may also be 1 or 2.
	Question 9b. Lake Erie Wetlands - Restricted	YES <input checked="" type="radio"/> 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 <input checked="" type="radio"/> NO	If yes, Category 3
Question 11. Relict Wet Prairies	YES <input checked="" type="radio"/> NO	If yes, evaluate for Category 3; may also be 1 or 2.	
Quantitative Rating	Metric 1. Size	0	
	Metric 2. Buffers and surrounding land use	1	
	Metric 3. Hydrology	5	
	Metric 4. Habitat	3	
	Metric 5. Special Wetland Communities	0	
	Metric 6. Plant communities, interspersions, microtopography	-4	
	TOTAL SCORE	5	Category based on score breakpoints Cat 1

Complete Wetland Categorization Worksheet.

Wetland Categorization Worksheet

Choices	Circle one	Evaluation of Categorization Result of ORAM
<p>Did you answer "Yes" to any of the following questions:</p> <p>Narrative Rating Nos. 2, 3, 4, 6, 7, 8a, 9d, 10</p>	<p>YES</p> <p>Wetland is categorized as a Category 3 wetland</p>	<p>NO</p> <p>Is quantitative rating score <i>less</i> than the Category 2 scoring threshold (<i>excluding</i> 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</p>
<p>Did you answer "Yes" to any of the following questions:</p> <p>Narrative Rating Nos. 1, 8b, 9b, 9e, 11</p>	<p>YES</p> <p>Wetland should be evaluated for possible Category 3 status</p>	<p>NO</p> <p>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.</p>
<p>Did you answer "Yes" to</p> <p>Narrative Rating No. 5</p>	<p>YES</p> <p>Wetland is categorized as a Category 1 wetland</p>	<p>NO</p> <p>Is quantitative rating score <i>greater</i> than the Category 2 scoring threshold (<i>including</i> 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</p>
<p>Does the quantitative score fall within the scoring range of a Category 1, 2, or 3 wetland?</p>	<p>YES</p> <p>Wetland is assigned to the appropriate category based on the scoring range</p>	<p>NO</p> <p>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.</p>
<p>Does the quantitative score fall with the "gray zone" for Category 1 or 2 or Category 2 or 3 wetlands?</p>	<p>YES</p> <p>Wetland is assigned to the higher of the two categories or assigned to a category based on detailed assessments and the narrative criteria</p>	<p>NO</p> <p>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).</p>
<p>Does the wetland otherwise exhibit <i>moderate OR superior</i> hydrologic OR habitat, OR recreational functions AND the wetland was <i>not</i> 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?</p>	<p>YES</p> <p>Wetland was undercategorized by this method. A written justification for recategorization should be provided on Background Information Form</p>	<p>NO</p> <p>Wetland is assigned to category as determined by the ORAM.</p> <p>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.</p>

Final Category

Choose one
Category 1
Category 2
Category 3

End of Ohio Rapid Assessment Method for Wetlands.

OEPA HHEI Forms

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

QHEI PERFORMED? Yes No QHEI Score ____ (If Yes, Attach Completed QHEI Form)

DOWNSTREAM DESIGNATED USE(S)

WWH Name: Mills Creek

Distance from Evaluated Stream 520 feet

CWH Name: ____

Distance from Evaluated Stream ____

EWH Name: ____

Distance from Evaluated Stream ____

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

USGS Quadrangle Name: Sandusky

NRCS Soil Map Page: _

NRCS Soil Map Stream Order _

County: Erie

Township / City: Perkins Township

MISCELLANEOUS

Base Flow Conditions? (Y/N): Y Date of last precipitation: 2026-01-13 Quantity: 0.05

Photo-documentation Notes: ____

Elevated Turbidity? (Y/N): N Canopy (% open): 100

Were samples collected for water chemistry? (Y/N): N Lab Sample # or ID (attach results): _

Field Measures: Temp (°C) 9.7 Dissolved Oxygen (mg/l) _ pH (S.U.) 8.13 Conductivity (µmhos/cm) _

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

Additional comments/description of pollution impacts:

BIOLOGICAL OBSERVATIONS

(Record all observations below)

Fish Observed? (Y/N) _ Species observed (if known): _

Frogs or Tadpoles Observed? (Y/N) _ Species observed (if known): _

Salamanders Observed? (Y/N) _ Species observed (if known): _

Aquatic Macroinvertebrates Observed? (Y/N) _ Species observed (if known): _

Comments Regarding Biology:

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

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

FLOW →

SEE PAGE 3

SKETCH OF STREAM REACH: S-EVN-01

