



Wetland and Waterbody Delineation Report

Lynn Bark Transmission Line Project

PREPARED FOR
Lynn Bark Energy Center, LLC

DATE
October 02, 2026

REFERENCE
0787742



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1. INTRODUCTION

On behalf of Lynn Bark Energy Center, LLC, Environmental Resources Management, Inc. (ERM) performed a desktop review and field delineation for wetlands and waterbodies (streams and open waterbodies such as ponds) within the proposed Lynn Bark Transmission Line Project (Project) in Martin County, Kentucky. The following report describes existing site conditions, methodologies, and findings associated with this site assessment.

A desktop review was conducted to identify the potential for occurrence of wetlands, waterbodies, and other sensitive environmental areas. This was completed using U.S. Geological Survey (USGS) topographic maps, high resolution aerial photography, the National Hydrography Dataset (NHD), U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) mapping, the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soil Survey Geographic (SSURGO) database, and Federal Emergency Management Agency (FEMA) floodplain data within the limits of the project survey area (Site).

ERM conducted a field wetland and waterbody delineation on July 7-9, 2026 including reverification of findings from prior field wetland and waterbody delineations conducted August 9-11, 2024, and July 14-18, 2025 within the Lynn Bark Energy Center solar photovoltaic facility, which intersects the northwestern portion of the transmission line project area. All figures referenced in the following report are provided in Appendix A, the Antecedent Precipitation Tool (APT) results are included in Appendix B, the Site photographs are included in Appendix C, and the United States Army Corps of Engineers (USACE) wetland determination data forms are provided in Appendix D.

2. SITE LOCATION

The Project is a 250 feet wide linear corridor that traverses approximately 6.33 miles of predominantly forested land in Martin County, Kentucky, located approximately 15 miles northeast of the City of Prestonsburg, totaling approximately 201 acres (Site; Appendix A, Figures 1 and 2).

3. METHODOLOGY

Waters of the United States (WOTUS), including wetlands, are federally protected under Section 404 of the Clean Water Act (CWA). On August 29, 2023, the agencies issued a final rule to amend the January 2023 Rule, to conform the definition of "waters of the United States" to the Supreme Court's decision in Sackett. This conforming rule amends the provisions of the agencies' definition of "waters of the United States" that are invalid under the Supreme Court's interpretation of the CWA in the Sackett decision and became effective on September 8, 2023, upon publication in the Federal Register. The definition of a wetland is *"those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas"* (Code of Federal Regulations §230.3(t)).



ERM delineated wetlands and waterbodies at the Site on August 9-11, 2024, July 14-18, 2025, and July 7-9, 2026. All surveys were conducted in accordance with the three-parameter methodology outlined in the 1987 USACE *Wetlands Delineation Manual* (Manual), the 2012 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountain and Piedmont Region (Version 2.0)*, and per recent guidance issued jointly by the U.S. Environmental Protection Agency and the USACE.

The three parameters required for identifying a jurisdictional wetland are as follows:

- The presence of hydrophytic vegetation - Hydrophytic vegetation is determined by the dominant species present at any given data point, where each species is assigned a plant indicator status as to its preference/tolerance for wetland conditions. Data points having dominant species that are greater than 50 percent facultative or wetter are considered to meet the hydrophytic vegetation criterion.
- The presence of hydrology - Each data point is evaluated for evidence of wetland hydrology or persistent saturation or inundation of soils. The Manual identifies both primary and secondary hydrologic indicators, and one primary indicator or two secondary indicators must be observed in order for the sample point to meet the hydrology criterion. Indicators include saturated soils in the upper 12 inches, inundation, water marks, drift lines, sediment deposits, drainage patterns, oxidized root channels in the upper 12 inches, water-stained leaves, local soil survey data, and others.
- The presence of hydric soils - Soil in each sample plot is sampled with a soil spade to a depth of at least 18 inches, or to the B horizon, whichever appears first. The delineator obtains a profile description and identifies hydric soil indicators based on soil texture(s) and soil color(s). Soil textures are determined by manual tactile sampling. Soil colors (in a moist condition) are compared to Munsell Soil-Color charts (2009 Edition, 2015 production year, Munsell Color, Grand Rapids, MI, USA) to determine hue, value, and chroma to determine if hydric characteristics are present.

An area is classified as a wetland only in instances where all three parameters exist under normal circumstances. If one or more criteria are absent, then the area is deemed upland.

To identify wetlands and waterbodies within the Site, the area was traversed on foot. Data points were taken within the Site to verify or refute the presence of wetland soils, vegetation, and hydrology. USACE wetland data forms were completed at each sample point. One corresponding upland community sample point was also taken for each wetland or wetland complex. If more than one type of wetland was observed within a larger wetland complex, the boundaries of the different types were identified, and separate USACE wetland data forms were completed for each type within the complex. In addition, Kentucky Rapid Bioassessment Protocol (RBP) High Gradient Habitat Assessment forms were completed for observed stream features to document stream habitat quality and physical condition. The RBP assessments documented features including substrate composition and availability, embeddedness, channel flow status, sediment deposition, channel alteration, frequency of riffles, bank stability, vegetative protection, and riparian zone condition (KDOW 2026a). Completed USACE Eastern Mountains and Piedmont Region Wetland Determination Data Forms and Kentucky RBP High Gradient Habitat Assessment forms are presented in Appendix D.



ERM utilized an Arrow Submeter Global Positioning System to obtain coordinates for the wetland data points, wetland boundaries, and waterbody boundaries during the field survey effort. This unit is capable of sub-meter accuracy (following post-processing and differential correction via a known base station) and allows the digital data to be incorporated into drawings for mapping/design purposes.

4. RESULTS

4.1 EXISTING SITE CONDITIONS

The Project is in the Dissected Appalachian Plateau Level IV EPA Ecoregion and is located within the Coldwater Fork sub-watershed Hydrologic Unit Code (HUC) 050702010603 (Woods et al. 2002; USGS 2026). Portions of the Project area were identified as historic surface mines and are primarily reclaimed, forested mine lands with the majority of vegetation consisting of Chinese bushclover, autumn olive, and naturally regenerated upland hardwood forest. The western most portion of the project area is barren land. Natural hydrology was observed as significantly disturbed due to historic mining activity. The western terminus of the Site can be accessed by Kentucky Route 3 via an unnamed road, the central portion of the Site can be accessed from Kentucky Route 906 (Coldwater Rd.) and the eastern terminus can be accessed from Kentucky Route 1439 (S. Wolf Creek Rd.). Additionally, several unnamed dirt roads run adjacent to and through the Site.

Topography at the Site is classified by flat ridge tops with steep terraced slopes and sheer drops associated with road cuts. Elevation ranges at the Site from 640 to 1,280 feet above mean sea level, (Appendix A, Figure 2).

Soils within the Site are characterized as stony to very rocky, with slopes ranging from 0 to 80 percent. Based on USDA NRCS SSURGO data (Appendix A; Figures 3.1-3.3), the only hydric soil mapping unit identified within the site is the Shelocta-Grigsby-Orrville complex (SgC) with 2 to 15 percent slopes (USDA 2019). A full summary of soils within the Site is provided in Table 1 below.

National Wetlands Inventory (NWI) mapping identified two freshwater pond features (PUBHx) totaling 0.93 acre (0.61 acre and 0.32 acre) and two riverine features, including 0.31 acre of R5UBH and 0.15 acre of R2UBH, within the Site, totaling 1.39 acres overall (USFWS 2023). According to the National Hydrography Dataset (NHD), three perennial streams occur within or adjacent to the project area: Wolf Creek (253 linear feet), Old Road Fork (256 linear feet), and Walnut Fork (254 linear feet). Collectively, these mapped perennial stream features total approximately 763 linear feet (USGS 2023). NWI and NHD features are presented in Appendix A; Figures 4.1-4.3.

Approximately 1.5 acres within the Site are classified as FEMA Flood Zone A, indicating a 1% annual chance of flooding. These areas are primarily concentrated along low-lying terrain and drainage corridors (FEMA 2026). The site extends east and west toward Wolf Creek Road and KY Route 3, with mapped floodplains generally following stream channels throughout the central and outlying portions of the Site. The remaining portions of the Site are classified as Zone X, Area of Minimal Flood Hazard (Appendix A; Figure 5).



TABLE 1 SUMMARY OF SOILS WITHIN THE SITE

Map Unit Symbol	Map Unit Name	Acres within Site	Percentage of Site	Hydric
FiF	Fiveblock, Fairpoint, and Kaymine soils, 30 to 80 percent slopes, stony	108.7	54.2	No
Raf	Rayne-Marrowbone-Dekalb complex, 20 to 80 percent slopes, very rocky	25.1	12.5	No
FiB	Fiveblock, Fairpoint, and Kaymine soils, 0 to 6 percent slopes, stony	18.6	9.3	No
uHfsF	Handshoe-Feds Creek-Shelockta complex, 30 to 80 percent slopes, very stony	17.0	8.5	No
uCskF	Cloverlick-Shelockta-Kimper complex, 20 to 80 percent slopes, very stony	12.0	6.0	No
FiD	Fiveblock, Fairpoint, and Kaymine soils, 6 to 30 percent slopes, stony	10.5	5.2	No
uDuty	Dumps, mine and tailings	5.8	2.9	No
uAdoC	Anthropotic Udorthents-Urban land complex, 0 to 15 percent slopes	1.7	0.90	No
SgC	Shelockta-Grigsby-Orrville complex, 2 to 15 percent slopes	1.1	0.60	Yes
Total Acreage		200.6	100%	

In anticipation of the collection of data during the site visit, climatic conditions for the Site were obtained utilizing the USACE and U.S. Environmental Protection Agency APT, which compares antecedent rainfall conditions for a given location to the range of normal rainfall conditions that occurred during the preceding 30 years to determine normal climatic conditions. The 2024 APT identifies August to be within the dry season and indicates that conditions were dryer than normal during the on-site assessment. Although daily rain showers and afternoon thunderstorms occurred during both on-site assessments, the APT identifies the July 2025 and July 2026 to be within the dry season and indicates that conditions were normal (EPA 2026). The results of the APTs are included in Appendix B.

Additionally, in accordance with the desktop and field analysis, no waterways are present within the Site that require a special use or cold-water habitat designation (e.g., Outstanding



State Resource Waters, Coldwater Aquatic Habitats, or other Special Use Waters) from the Kentucky Division of Water (KDOW; KDOW 2026b). Photographs of the delineated waterbodies are presented in Appendix C.

4.2 WETLANDS

During the onsite delineations, ERM identified four Palustrine Emergent (PEM) wetlands totaling 0.32 acre within the Site. Two of these wetlands (Wetland 5 and Wetland 7) were also observed during the August 9-11, 2024, July 14-18, 2025 field delineations previously conducted in support of the Lynn Bark photovoltaic arrays facility.

Based on ERM's professional opinion, these wetlands are not adjacent to relatively permanent waters (RPWs) and are potentially non-jurisdictional features. Preliminary jurisdictional opinion is based off the current definition of WOTUS for the Commonwealth of Kentucky at the completion of this report, 2023 Rule as amended by the decision of *Sackett v. U.S. Environmental Protection Agency*. Table 2 lists each wetland by a unique Feature ID, Cowardin classification, feature acreage, and preliminary jurisdictional opinion. The delineated wetland features are shown in Appendix A, Figures 6.1-6.6. A photographic log of representative wetland types is presented in Appendix C. Additional details and justifications for the classification of the wetlands can be found on the USACE Wetland Determination Data Forms, provided in Appendix D.

TABLE 2 WETLANDS IDENTIFIED WITHIN THE SITE

Feature	Cowardin Classification ¹	Area (Acres) ²	Preliminary Jurisdictional Opinion ³	Latitude	Longitude
AWET02	PEM	0.04	Non-Jurisdictional	37.790426	-82.548267
BWET01	PEM	0.05	Non-Jurisdictional	37.763604	-82.484636
Wetland 5	PEM	0.13	Non-Jurisdictional	37.79072	-82.547518
Wetland 17	PEM	0.11	Non-Jurisdictional	37.790278	-82.548445
	Total	0.32			

¹ Classifications are based on ERM's professional judgment of actual field conditions.

² Feature size within Site

³ Jurisdictional determinations and boundaries when presented are preliminary and subject to final verification by the USACE.

4.3 WATERBODIES

4.3.1 STREAMS

During the delineations, ERM identified five stream features which consist of 1,380 linear feet. Of the five features, three perennial stream features totaling 751 linear feet, one intermittent stream totaling 314 linear feet, and one ephemeral stream totaling 315 linear feet were identified within the Site. Photographs of the stream features are presented in Appendix C. Locations of these stream features are presented in Appendix A, Figures 6.1-6.6.



Perennial streams on Site are expected to flow throughout the year. These streams generally had moderate to strong geomorphology, strong bed and bank, moderate sinuosity, as well as moderate to strong in-stream features such as particle size, defined bed and bank, and aquatic habitat. Ephemeral streams on Site had weak to absent hydrological indicators including baseflow, sediment and organic debris piles, and leaf litter. Intermittent streams are expected to flow seasonally during portions of the year when supported by precipitation events and groundwater inputs. These streams typically exhibit moderate hydrologic indicators, including ordinary high water marks, sediment deposition, organic debris accumulations, and moderately defined bed and bank features, but lack continuous baseflow during drier periods.

Approximately 1,065 linear feet of perennial and intermittent streams are considered potential jurisdictional features, classified as RPWs. The remaining features, classified as ephemeral stream features, are not considered RPWs and would most likely not be considered jurisdictional. Table 3 lists each waterbody by a unique feature name, hydrologic flow regime, length in linear feet, and preliminary jurisdictional opinion.

TABLE 3 STREAMS IDENTIFIED WITHIN THE SITE

Feature ID	Flow Regime ¹	Length (Linear feet) ²	Preliminary Jurisdictional Opinion ³	Cowardin Class	Latitude	Longitude
STR01p_rjs (Coldwater Creek)	Perennial	250	Jurisdictional	R2UBH	37.784108	-82.853710
STR02i_rjs	Intermittent	314	Jurisdictional	R4SB3	37.764360	-82.481758
STR03e_rjs	Ephemeral	315	Non-Jurisdictional	R6	37.764330	-82.481870
STR04p_rjs (Wolf Creek)	Perennial	250	Jurisdictional	R2UBH	37.761159	-82.488765
BSTR01 (Walnut Fork)	Perennial	251	Jurisdictional	R2UBH	37.772128	-82.517118
	Total Ephemeral	315				
	Total Intermittent	314				
	Total Perennial	751				
	Total	1,380				

¹ Classifications are based on ERM's professional judgment of actual field conditions.

² Feature size within Site

³ Jurisdictional determinations and boundaries when presented are preliminary and subject to final verification by the USACE.

4.3.2 OPEN WATERBODIES

No open waterbodies were identified on the Site.



5. CONCLUSION

ERM performed onsite wetland and waterbody delineations on July 7-9, 2026, July 14-18, 2025, and August 9-11, 2024, within the proposed Lynn Bark Transmission Line in Martin County, Kentucky. Five stream features which consist of 1,380 linear feet and four PEM wetlands totaling 0.32 acres were identified. No open waterbodies were identified within the Site.

Although these findings are based upon a survey utilizing USACE-approved protocols and current regulatory guidance, the USACE must make the official determinations on the presence or absence of jurisdictional WOTUS on Site through the jurisdictional determination process.



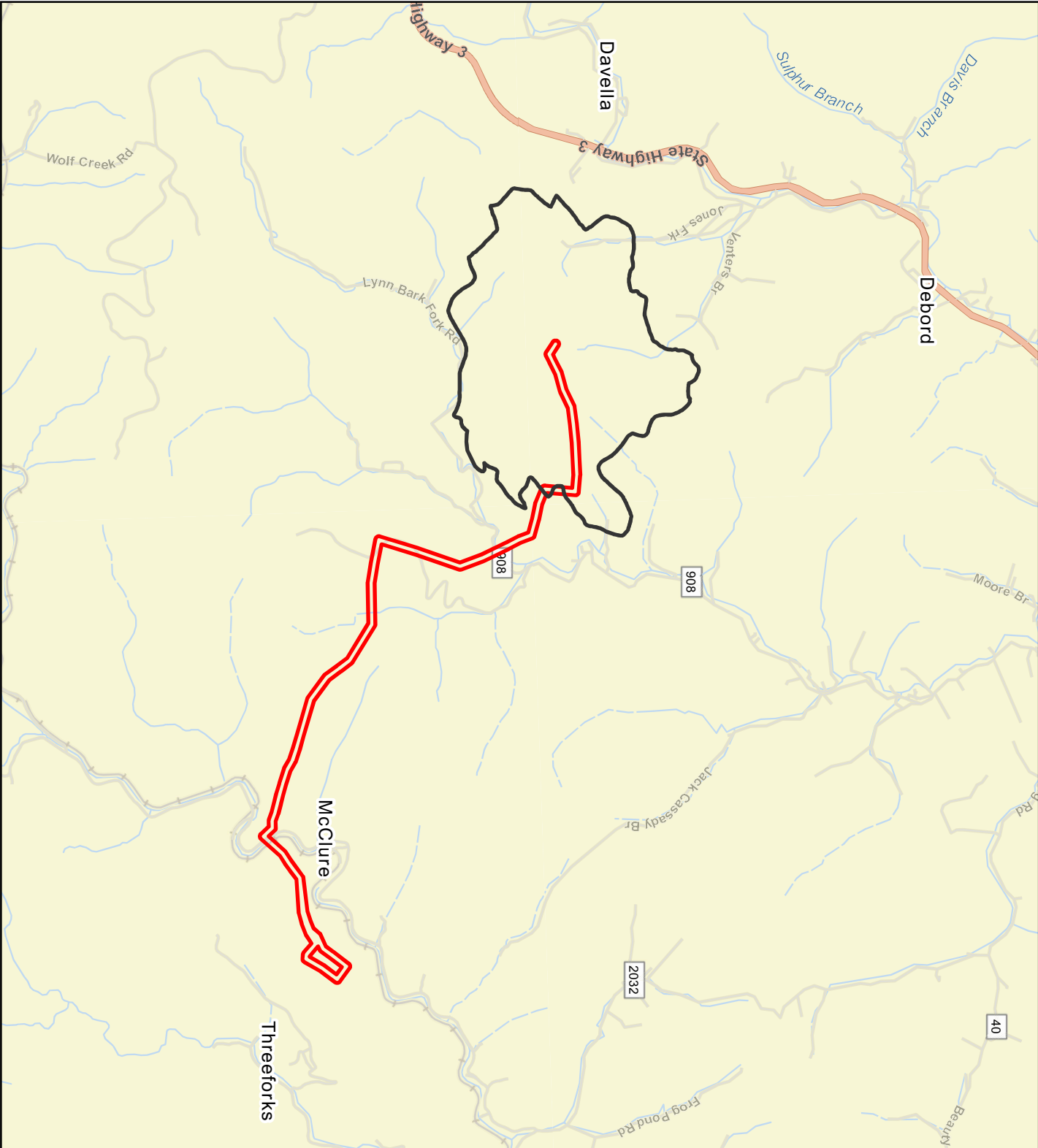
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APPENDIX A FIGURES





Legend

-  Transmission Line
-  Boundary
-  Solar Farm Boundary

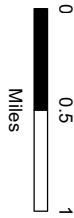
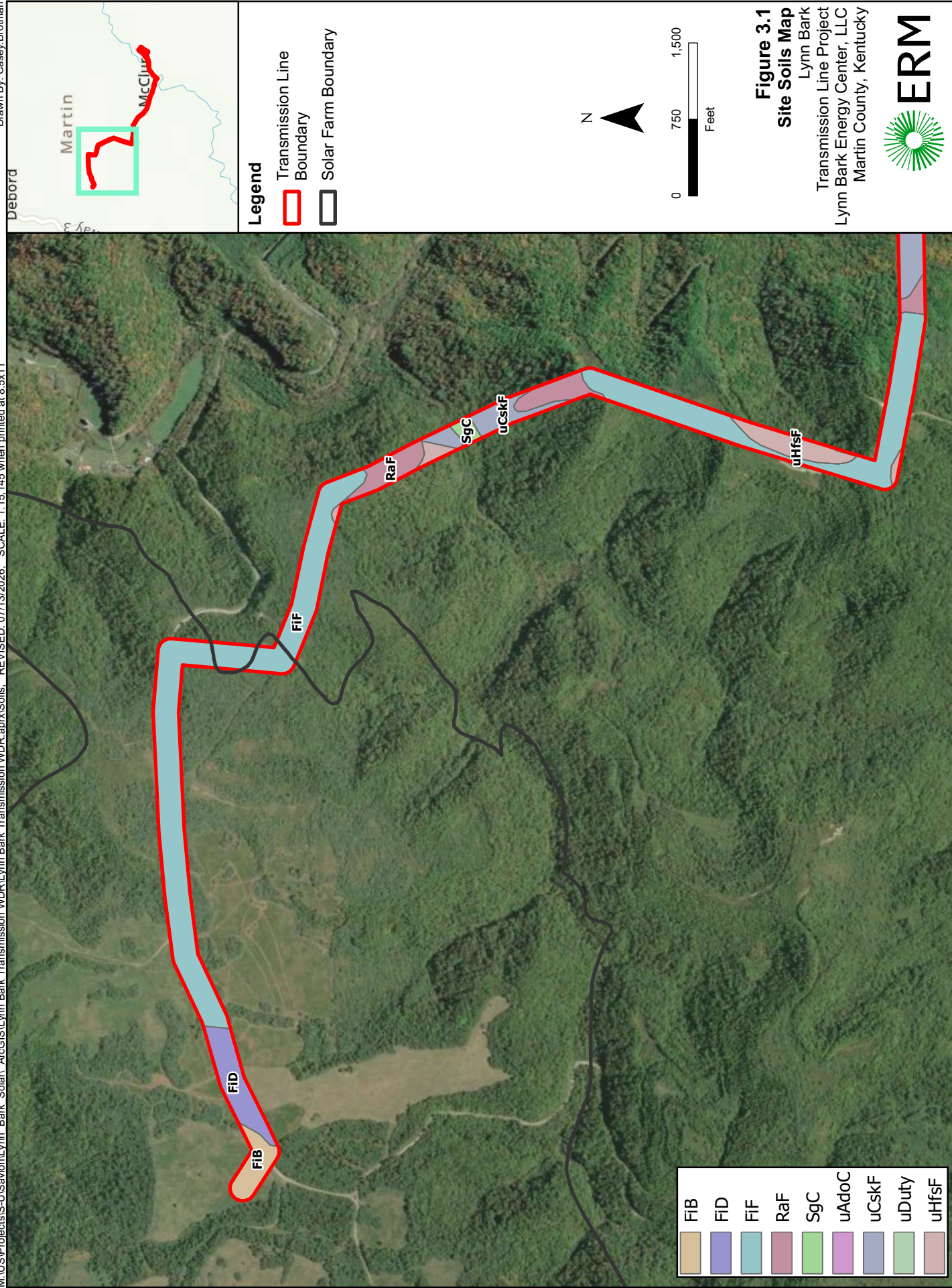
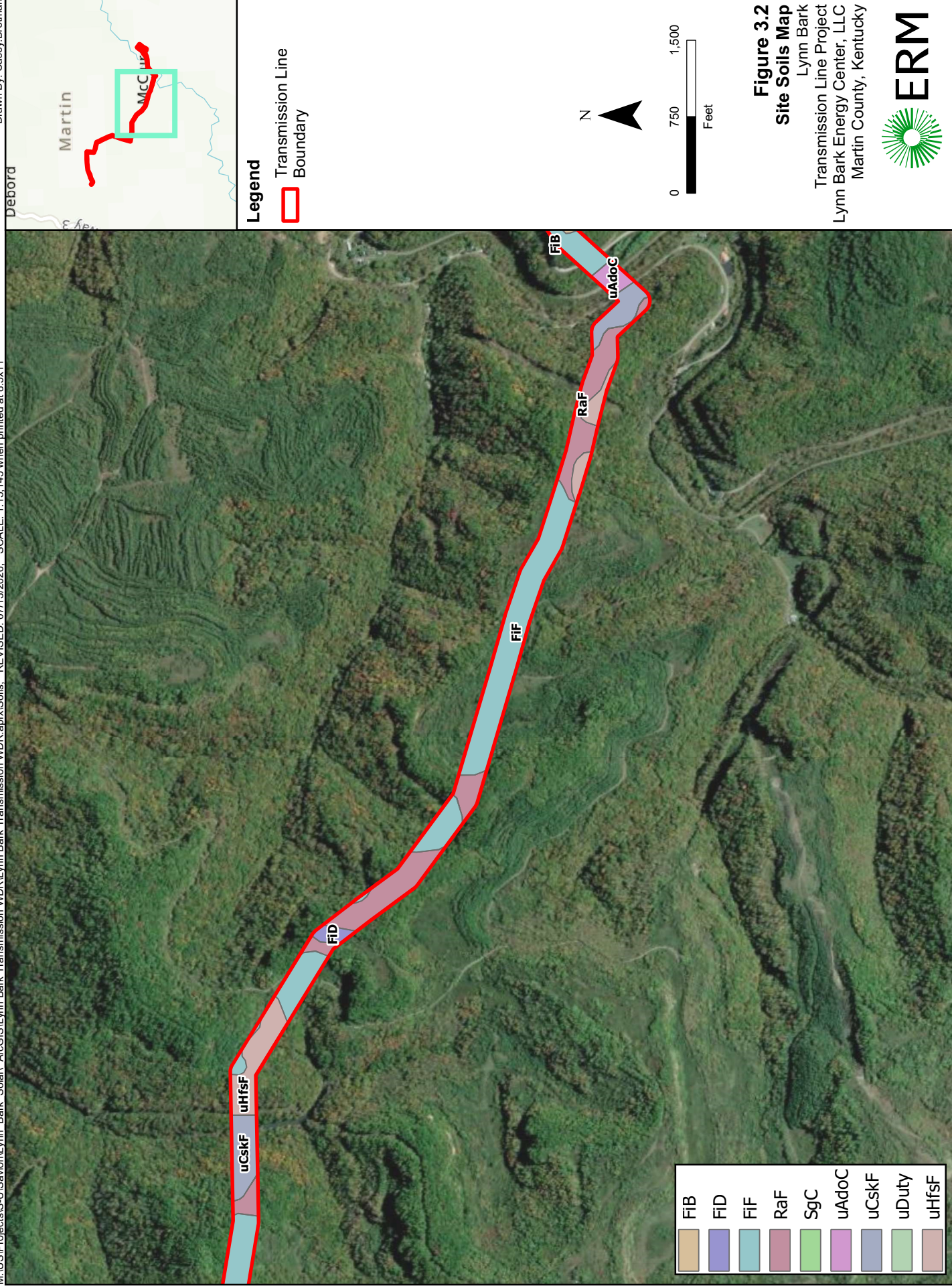


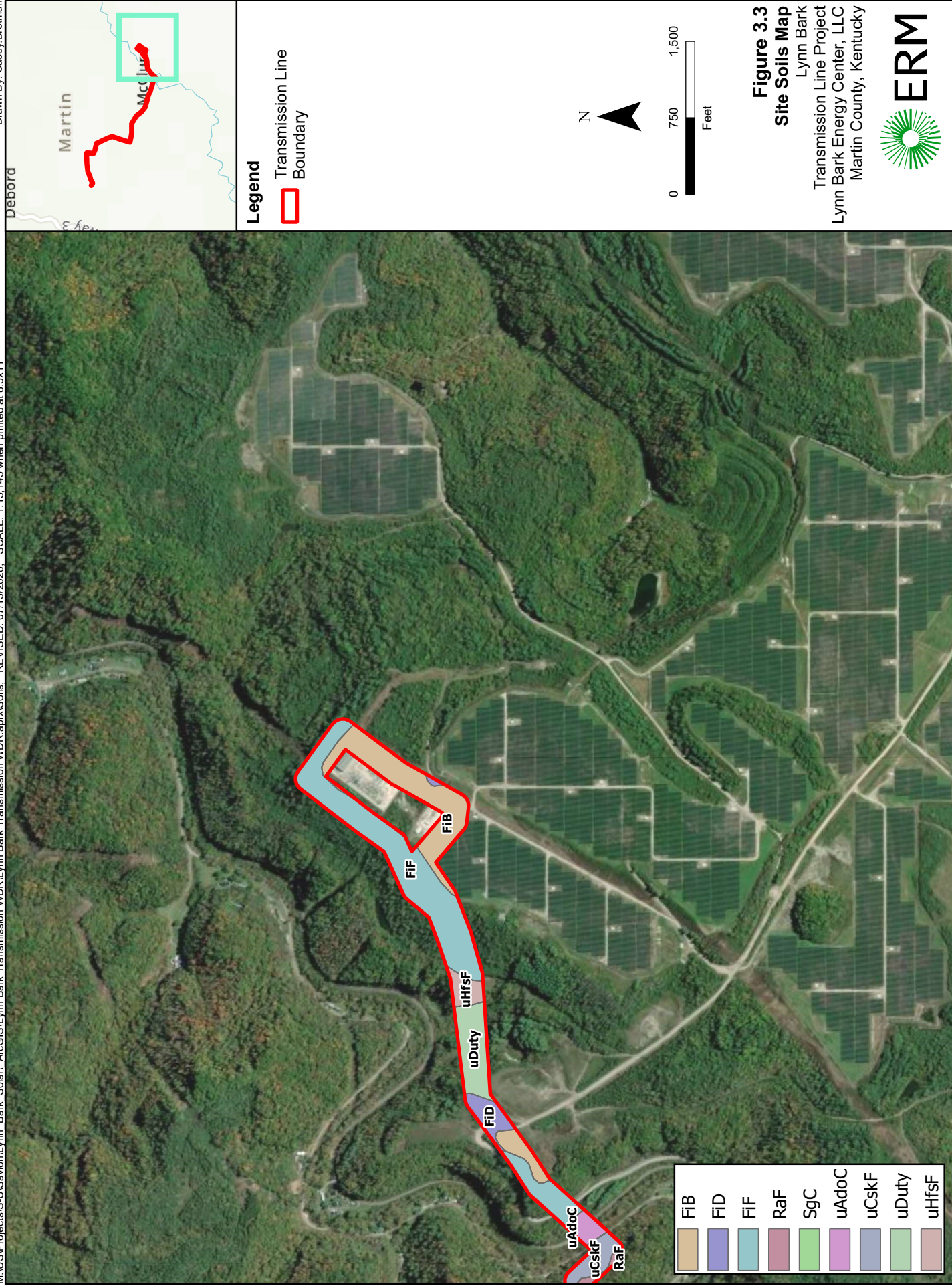
Figure 1
Site Map
Lynn Bark
Transmission Line Project
Lynn Bark Energy Center, LLC
Martin County, Kentucky

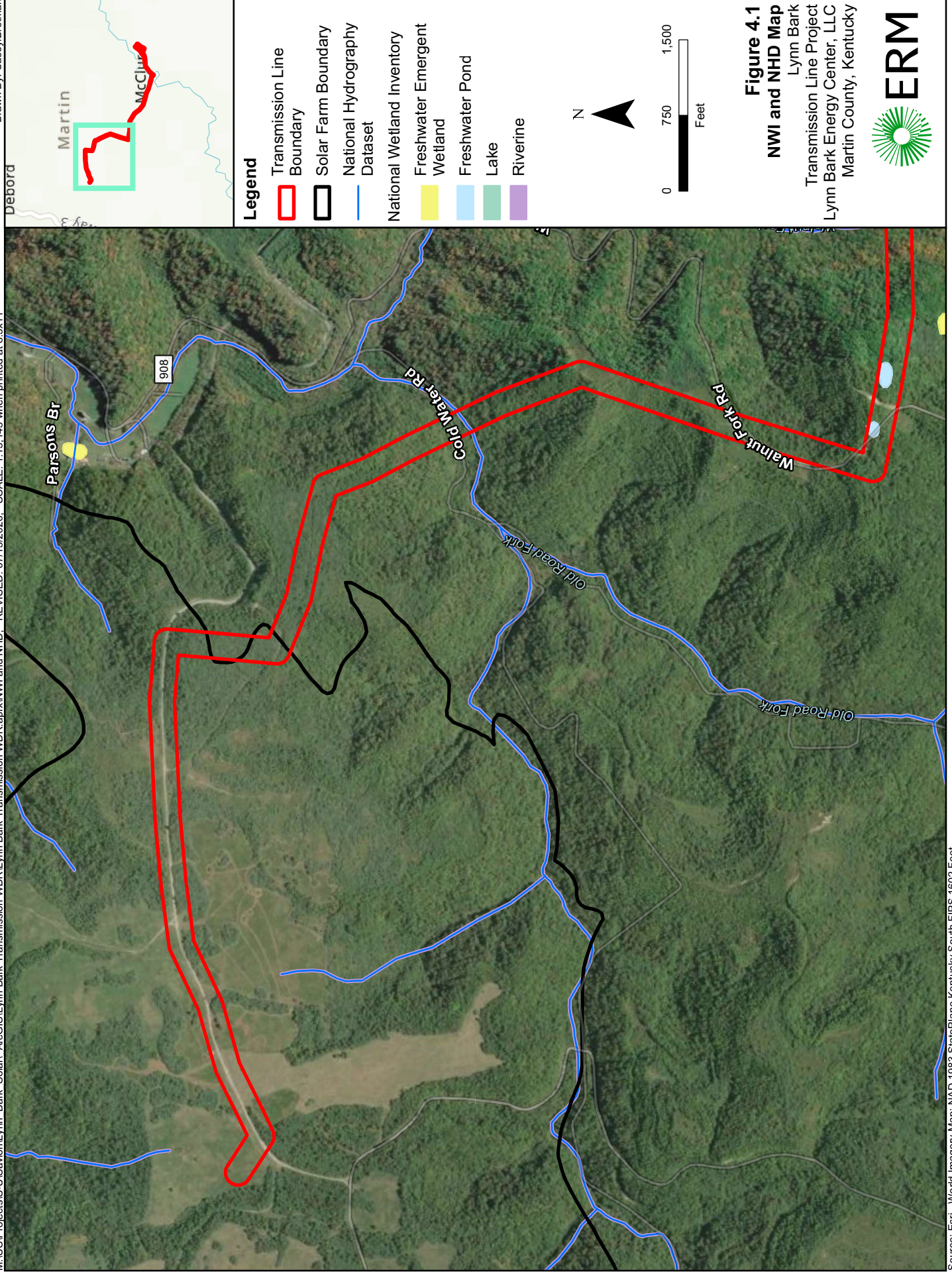


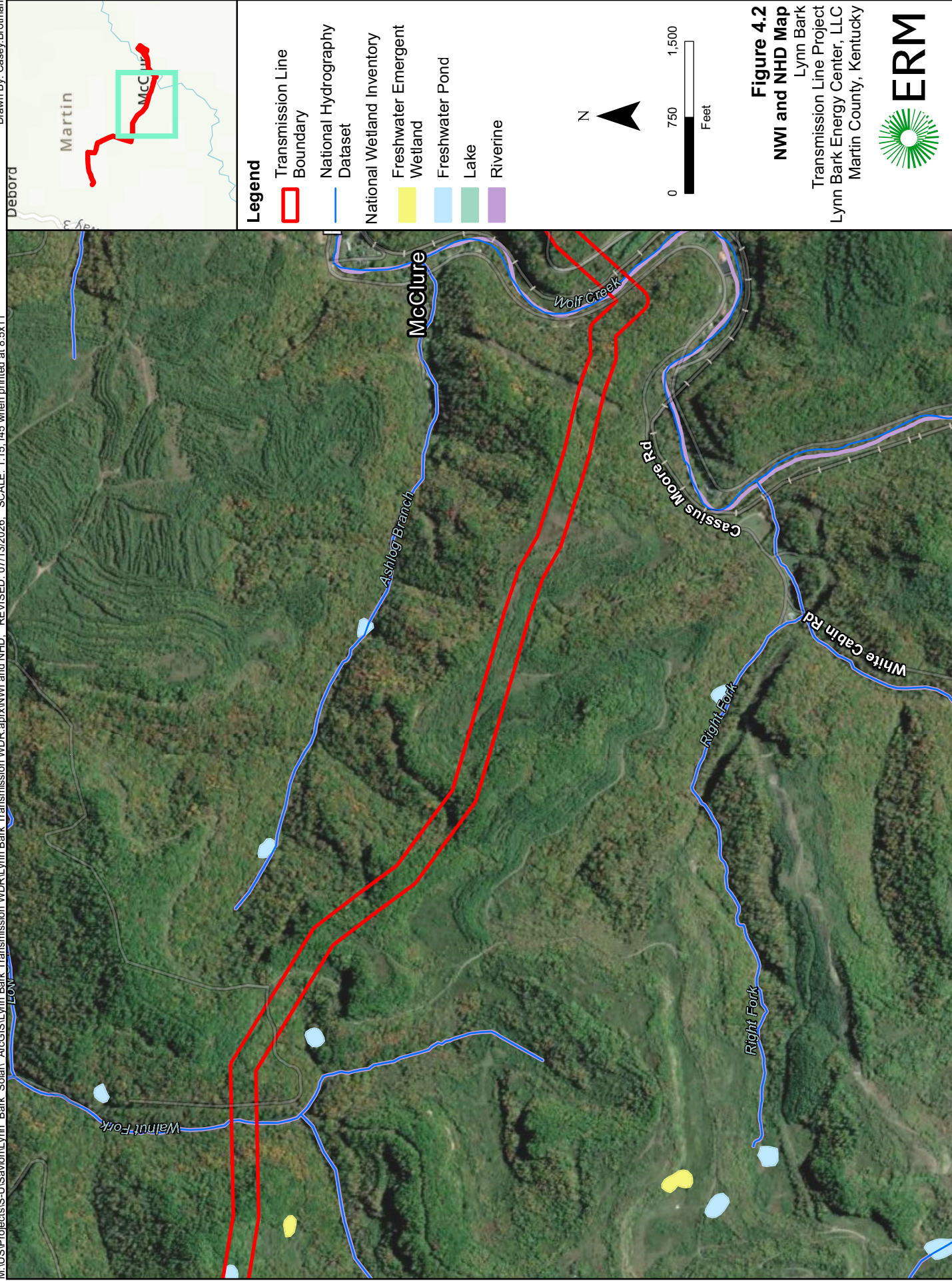


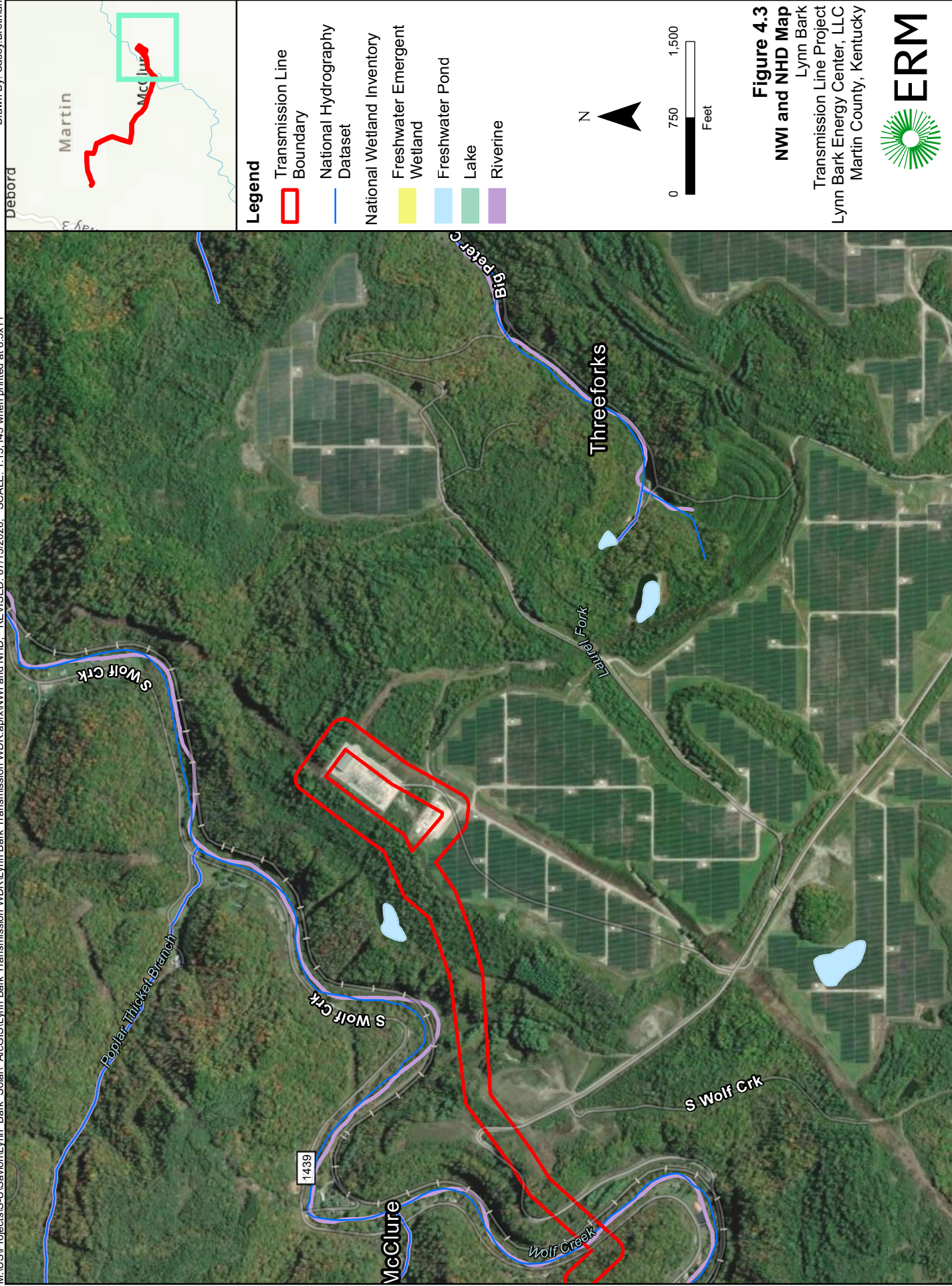


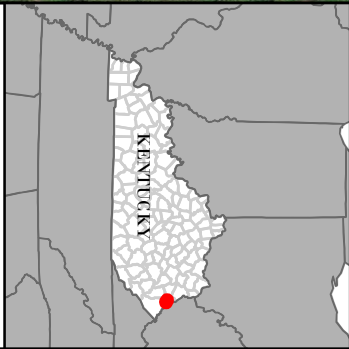
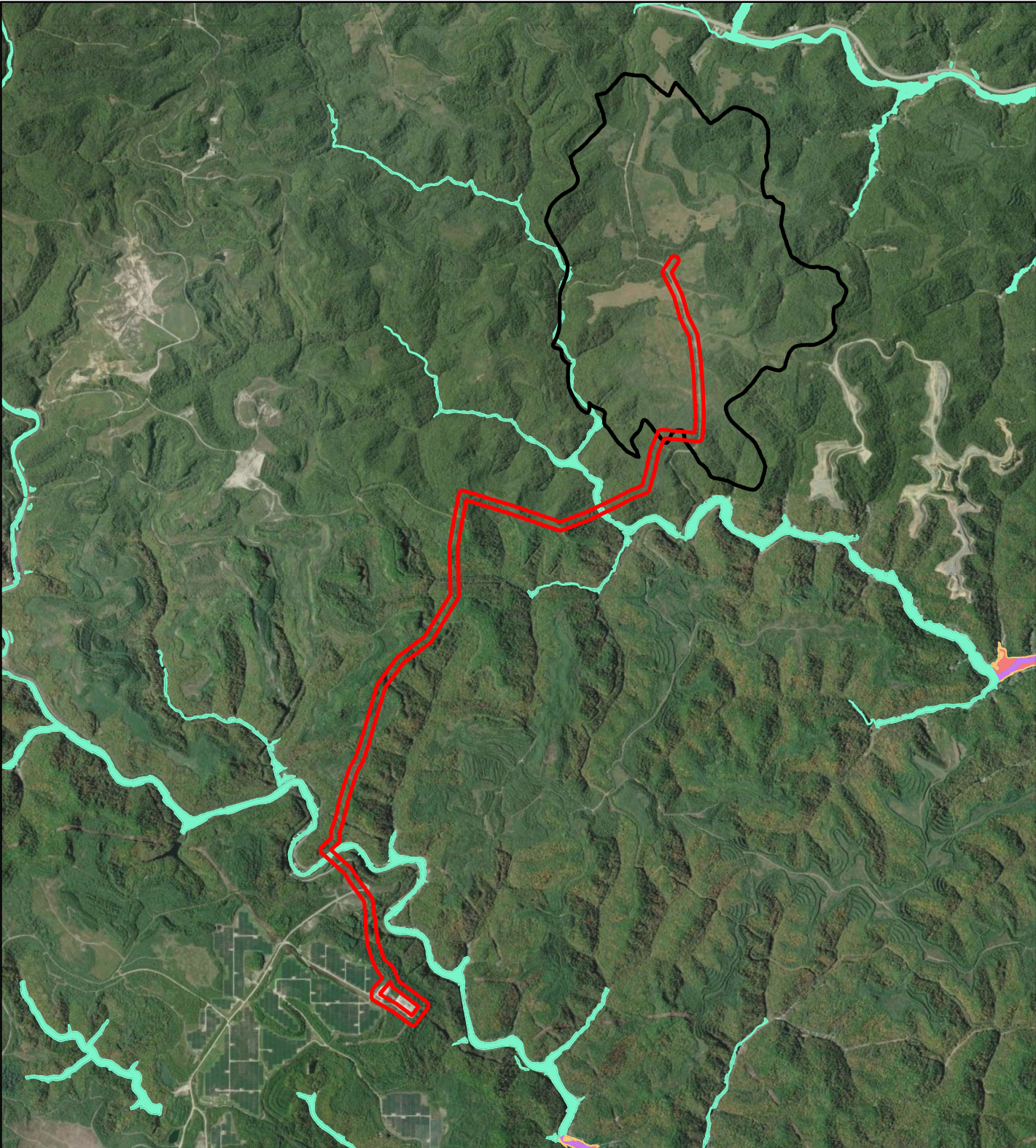












Legend

- Transmission Line Boundary
- Solar Farm Boundary
- Zone A (1% Annual Chance of Flood)
- Zone AE (1% Annual Chance of Flood)
- Zone AE, Floodway (1% Annual Chance of Flood)
- Zone X (0.2% Annual Chance of Flood)
- Zone X (1% Annual Chance of Flood)

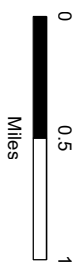
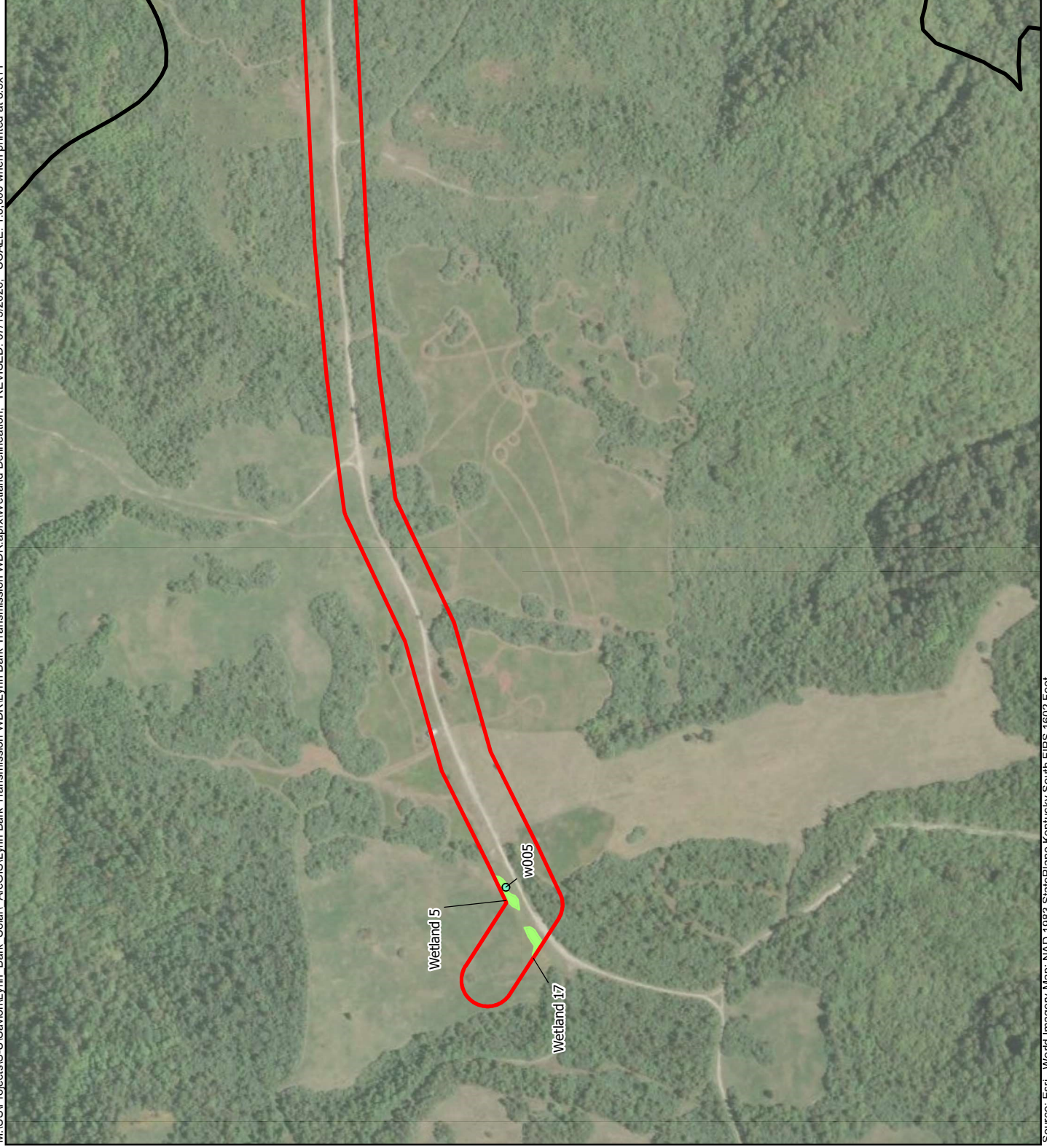


Figure 5
FEMA Flood Hazard Map
Lynn Bark
Transmission Line Project
Lynn Bark Energy Center, LLC
Martin County, Kentucky





Legend

- Transmission Line Boundary
- Solar Farm Boundary
- PEM Wetland (0.32 acres)
- Wetland Datapoint

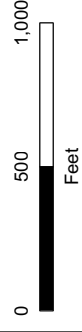


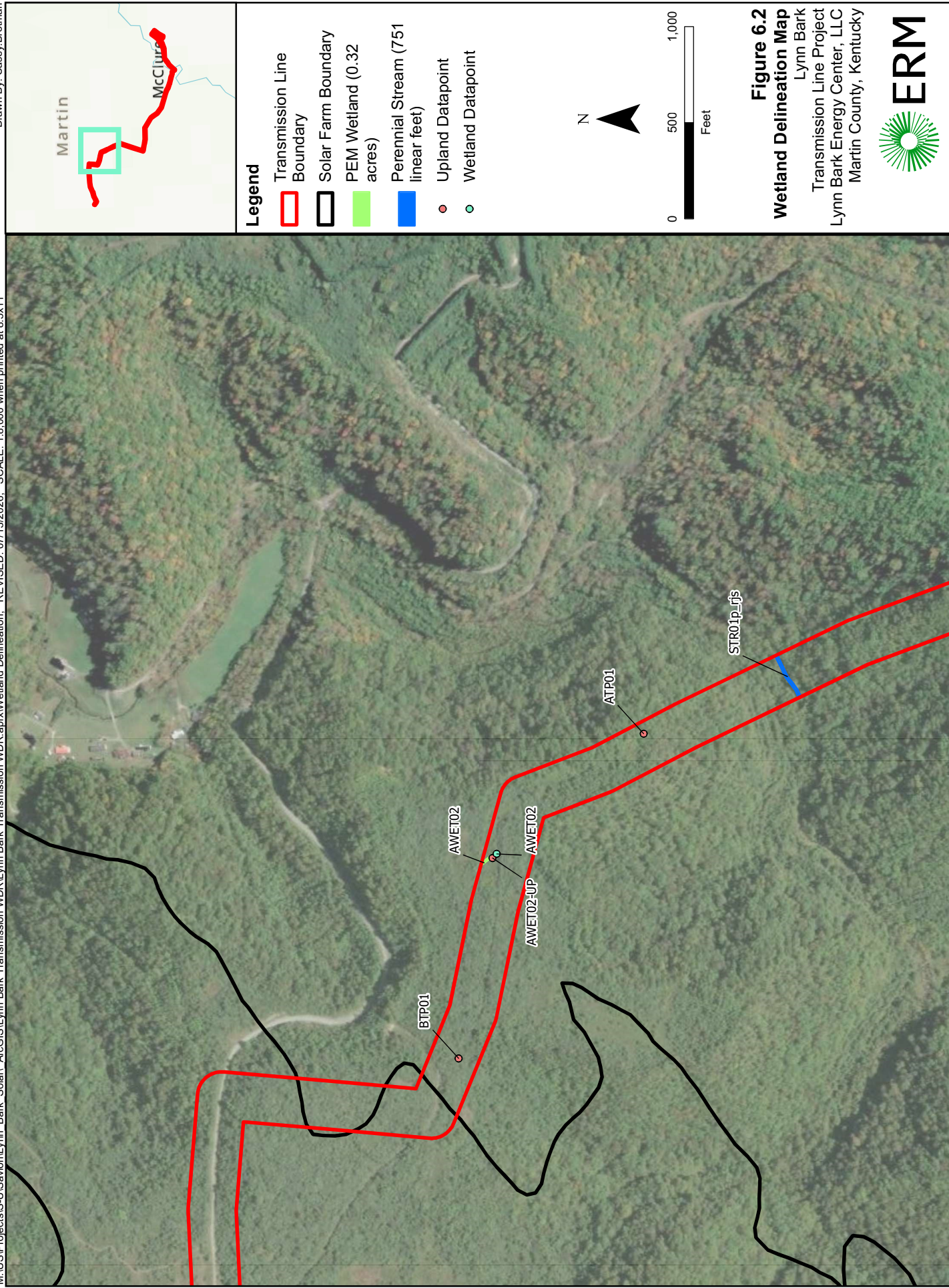
Figure 6.1

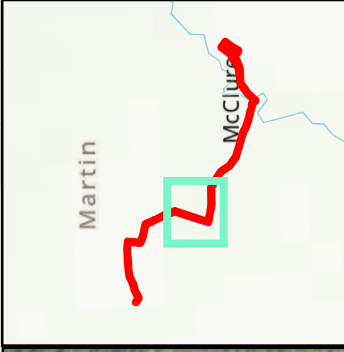
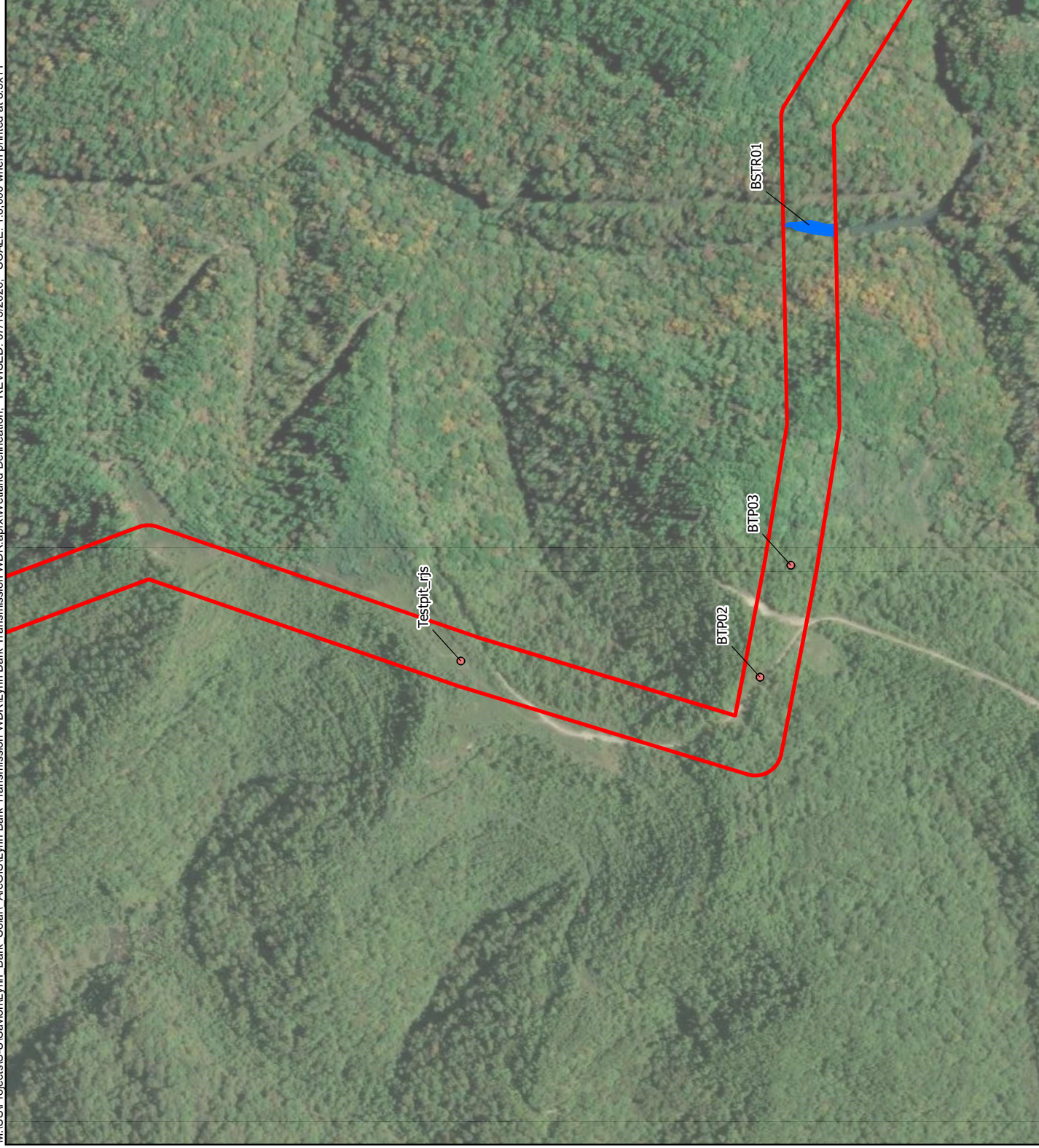
Wetland Delineation Map

Lynn Bark
Transmission Line Project
Lynn Bark Energy Center, LLC
Martin County, Kentucky



ERM





Legend

- Transmission Line Boundary
- Perennial Stream (751 linear feet)
- Upland Datapoint

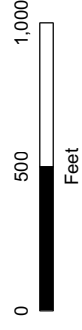


Figure 6.3

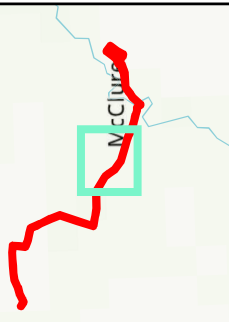
Wetland Delineation Map

Lynn Bark
Transmission Line Project
Lynn Bark Energy Center, LLC
Martin County, Kentucky





Martin



Legend

- Transmission Line Boundary
- Upland Datapoint

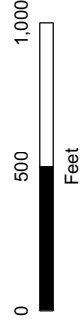
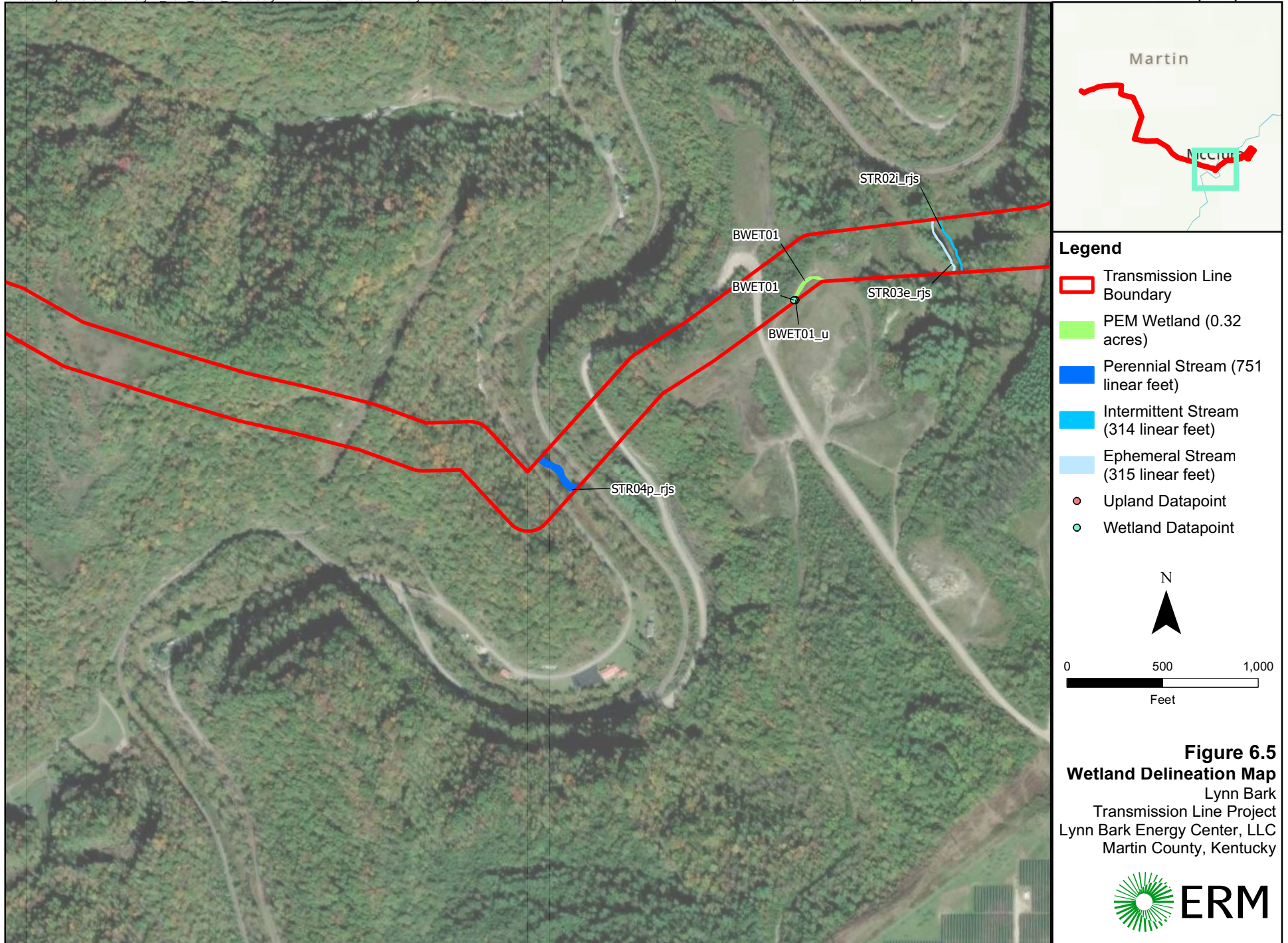


Figure 6.4
Wetland Delineation Map

Lynn Bark
Transmission Line Project
Lynn Bark Energy Center, LLC
Martin County, Kentucky







Martin



Legend

- Transmission Line
- Boundary

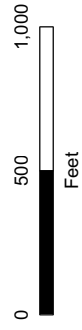


Figure 6.6

Wetland Delineation Map

Lynn Bark

Transmission Line Project

Lynn Bark Energy Center, LLC

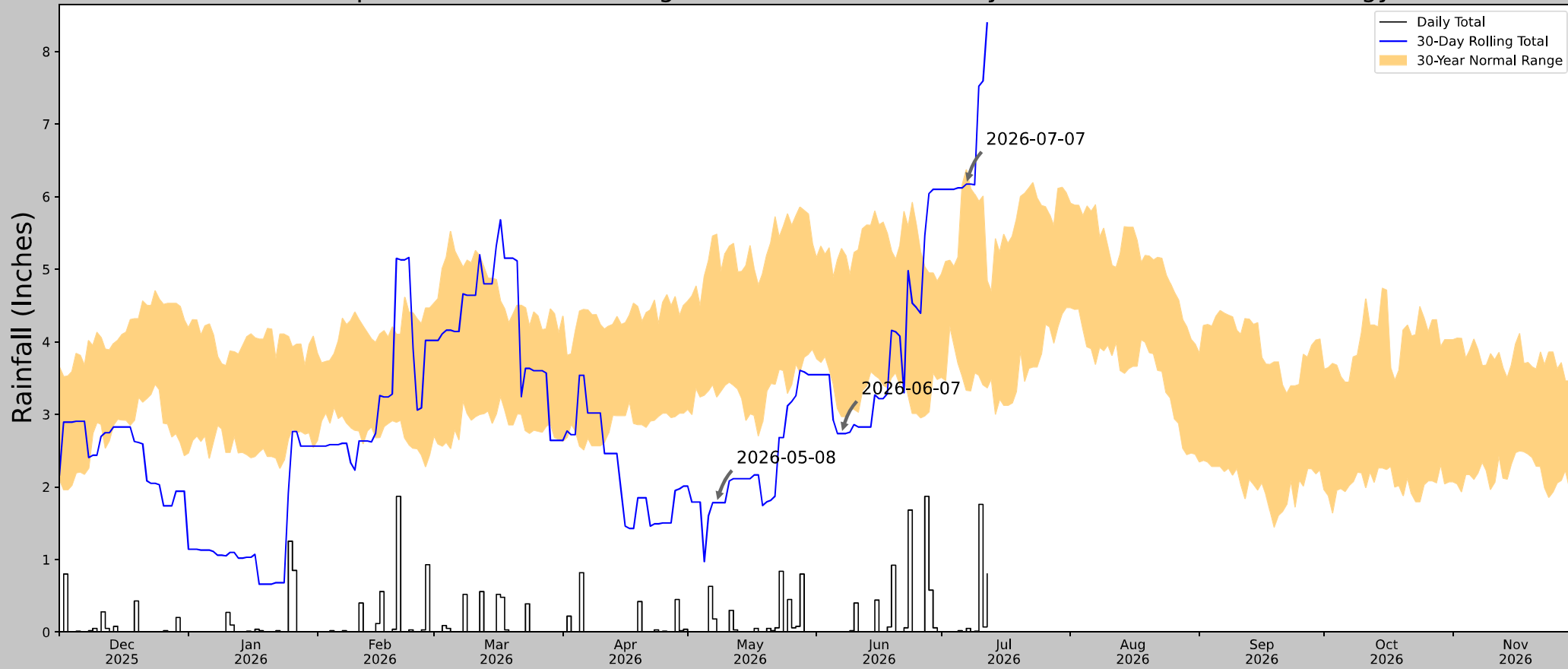
Martin County, Kentucky



ERM

APPENDIX B ANTECEDENT PRECIPITATION TOOL

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



Coordinates	37.76601, -82.50637
Observation Date	2026-07-07
Elevation (ft)	1112.435
Drought Index (PDSI)	Mild drought (2026-06)
WebWIMP H ₂ O Balance	Dry Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-07-07	3.333465	6.367717	6.173229	Normal	2	3	6
2026-06-07	2.971654	5.283465	2.736221	Dry	1	2	2
2026-05-08	3.242126	5.483071	1.783465	Dry	1	1	1
Result							Drier than Normal - 9

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
INEZ 2 E	37.8725, -82.5194	709.974	7.392	402.461	6.301	6518	82
PILGRIM 4.5 WSW	37.7628, -82.4904	691.929	7.743	18.045	3.624	11	0
FORT GAY 9.1 SE	38.0168, -82.4883	582.021	10.113	127.953	5.845	0	8
VAN LEAR 4.4 E	37.7753, -82.6753	816.929	10.84	106.955	6.037	1	0
CHARLEY 2 SW	37.9589, -82.7464	740.158	13.738	30.184	6.597	2326	0
DUNLOW 1 SW	37.9494, -82.4047	1112.861	8.205	402.887	6.998	2478	0
PAINTSVILLE 1E	37.8175, -82.7883	629.921	15.156	80.053	8.033	14	0
E LYNN LAKE	38.1436, -82.3825	747.047	20.159	37.073	9.819	4	0
LOUISA 5W	38.125, -82.6933	767.06	19.85	57.086	10.066	1	0

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



Coordinates	37.76601, -82.50637
Observation Date	2026-07-08
Elevation (ft)	1112.435
Drought Index (PDSI)	Mild drought (2026-06)
WebWIMP H ₂ O Balance	Dry Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-07-08	3.325197	6.108662	6.173229	Wet	3	3	9
2026-06-08	2.971654	5.190158	2.736221	Dry	1	2	2
2026-05-09	3.32441	4.961811	1.783465	Dry	1	1	1
Result							Normal Conditions - 12

Figures and tables made by the
Antecedent Precipitation Tool
Version 3.0



US Army Corps
of Engineers



Developed by:
U.S. Army Corps of Engineers and
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Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
INEZ 2 E	37.8725, -82.5194	709.974	7.392	402.461	6.301	6518	81
PILGRIM 4.5 WSW	37.7628, -82.4904	691.929	7.743	18.045	3.624	11	1
FORT GAY 9.1 SE	38.0168, -82.4883	582.021	10.113	127.953	5.845	0	8
VAN LEAR 4.4 E	37.7753, -82.6753	816.929	10.84	106.955	6.037	1	0
CHARLEY 2 SW	37.9589, -82.7464	740.158	13.738	30.184	6.597	2326	0
DUNLOW 1 SW	37.9494, -82.4047	1112.861	8.205	402.887	6.998	2478	0
PAINTSVILLE 1E	37.8175, -82.7883	629.921	15.156	80.053	8.033	14	0
E LYNN LAKE	38.1436, -82.3825	747.047	20.159	37.073	9.819	4	0
LOUISA 5W	38.125, -82.6933	767.06	19.85	57.086	10.066	1	0