AMERICAN TRANSMISSION SYSTEMS, INCORPORATED
A FIRSTENERGY COMPANY

CONSTRUCTION NOTICE

BROADVIEW - TANGY 138 kV TRANSMISSION LINE SWITCH REPLACMENT PROJECT

OPSB CASE NO.: 23-0829-EL-BNR

September 19, 2023

American Transmission Systems, Incorporated
76 South Main Street
Akron, Ohio 44308

CONSTRUCTION NOTICE
BROADVIEW-TANGY 138 kV TRANSMISSION LINE
SWITCH REPLACMENT PROJECT

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

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05 (B)(1): Name and Reference Number

Name of Project:	Broadview-Tangy 138 kV Transmission Line Switch Replacement Project ("Project")
Reference Number:	2109-2

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

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, proposes to replace two existing transmission line switches with two auto-sectionalizing switches on the Broadview–Tangy 138 kV Transmission Line at the 138 kV transmission line tap to Bellepoint Substation. The following will be done to accomplish the replacement of the existing switches:

- Replace structure #5214 with a single circuit three-pole wood switch structure.
- Install a single circuit, laminate switch pole midspan (#5213A) between structures #5213 and #12349.
- Replace structure #12350 with a single circuit, single pole wood structure.

The general location of the Project is shown in Exhibit 1, a partial copy of the United States Geologic Survey, Delaware County OH, Quad Map. Exhibit 2 is a copy of ESRI aerial imagery of the Project area. The general layout is shown in Exhibit 3. The Project is located in Concord Township, Delaware County, Ohio.

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

The Project meets the requirements for a Construction Notice because the Project is within the types of projects defined by Item (2)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of OAC Rule 4906-1-01. This item states:

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

The proposed Project is within the requirements of Item (2)(a) as it involves adding structures to an existing line and replacing structures with a different type of structure for a distance of less than two miles.

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

The Project is needed to reduce the exposure to outages and to decrease the time needed to restore the line to service by upgrading the transmission line switches on the Broadview-Tangy 138 kV Transmission Line. This will improve reliability and operational flexibility to the existing and future customers served by the transmission line. The Broadview-Tangy 138 kV Transmission Line currently serves two delivery points, Mill Creek and Bellepoint substations, which, in turn, provide service to approximately 5,100 customers equaling approximately 31 MW of load. Two SCADA controlled transmission in-line switches are currently installed at the Mill Creek delivery point that can be remotely operated from the system operator to sectionalize the transmission system during an unplanned outage or maintenance event. The current switch configuration at the Bellepoint delivery point consists of manually operated air switches that need to be opened and/or/ closed in the field for any unplanned outage or maintenance event. The replacement of this type of switch is occurring under the

FirstEnergy Energizing the Future program to improve the reliability, operational flexibility, and resiliency of the transmission system.

This project proposes to replace the existing manual switches A-140 and A-152 at the Bellepoint delivery point with motor-operated switches to allow installation of an auto-sectionalizing scheme. Currently, structure #12349 is a 110 ft direct embedded, guyed steel tap pole supporting the manual two-way switch (A-140 and A-152) in a phase over phase orientation. The two-way switch will be removed from pole #12349 and new switches installed. The pole will remain to support the tap to Bellepointe.

As shown on Exhibit 3, a new switch (A-627) will be installed on a new single circuit laminate switch pole (#5213A) that will be located midspan between structures #5213 and #12349. The second switch (A-631) will be installed on a new single circuit three-pole wood structure that will be located, along the same centerline, immediately southwest of existing structure #5214 and the existing structure will be removed. Due to the physical condition of structure #12350 on the tap to Bellepointe, it will be replaced with ah one single circuit, single pole wood structure as part of this Project. The existing conductor and shield wire will be transferred to new structures along the main alignment.

These changes will minimize the outages to customers served from the Bellepoint Substation and allow automatic and prompt sectionalizing and restoration of the transmission line during both planned and unplanned outage events.

Since 2019, the Broadview–Tangy 138 kV Transmission Line has experienced two sustained outages and one momentary outage. In 2019, the Broadview–Tangy 138 kV Transmission Line experienced the longest sustained outage of approximately 26 hours. The transmission line was out of service until the necessary repairs were completed, and the transmission line was able to be restored to normal service. During the event, customers at both Bellepoint and Mill Creek substations experienced outages until the line was sectionalized using the existing switching scheme. Installing an auto-sectionalizing scheme as proposed under this Project will significantly limit the outages

experienced by the customers served from these substations under similar outage events which will improve overall reliability to the customers.

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

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2023 Long-Term Forecast Report ("LTFR"). This map was submitted to the PUCO in Case No. 23-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. This map shows ATSI's 345 kV and 138 kV transmission lines and transmission substations including the Broadview - Tangy 138 kV Transmission Line. The Project was included in ATSI's LTFR filed in 2023 on page 99. The general location and layout of the Project area are shown in Exhibits 1 through 3.

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

An alternative to the proposed project is for ATSI to continue operating with the existing manual switches. However, this does not provide the operational flexibility for system operators to remotely sectionalize the transmission system during an outage event and restore service to customers more quickly. This will impact the reliability and outage durations experienced by the customers served from the Bellepoint Substation. This is not the preferred course of action. As stated previously, because the switches are manually operated requiring a transmission line crew to be dispatched to the location to operate the switches, necessary operational switching on the transmission system is constrained, and the ability to provide more reliable transmission service to existing and future customers served from the Broadview-Tangy 138 kV Transmission Line is limited.

Another alternative considered was to build a new three-breaker ring bus at/near Bellepoint Substation. Though the ring bus alternative will provide more operational functionality than the auto-sectionalizing switches, it is considerably more expensive and would result in greater landowner and construction impact.

Another alternative considered was to replace the switches with motor-operated switches with SCADA control. This allows the system operators to remotely sectionalize the transmission system during an outage event but does require additional time for the system operator to troubleshoot and determine which switches need to be open and closed to restore the customers. While this is an improvement over the existing manual switches, this is not the preferred course of action either because it still requires manual intervention from the system operator to determine the location of the fault and take appropriate action to sectionalize the transmission line and restore service to the customers.

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

ATSI's manager of External Affairs will advise local officials of the features and status of the proposed Project as necessary. ATSI has also established a Project website, through which a copy of this Construction Notice application, along with other Project information, can be accessed:

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

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

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

Construction on this Project is expected to begin on November 13, 2023 and be completed by December 30, 2023.

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

Exhibit 1 and 2 depict the general location of the Project. Exhibit 1 provides a partial copy of the United States Geologic Survey, Richland 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 wholly within ATSI's existing right-of-way. No new easements will be required for the completion of this Project. Table 1 contains a list of properties impacted by the Project.

Table 1: Properties Impacted by the Project

Parcel Number	Easement Status
50031001004002	Existing
50031001006000	Existing
50031001004000	Existing
50031001007000	Fee Owned

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

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

The transmission line construction will have the following characteristics:

Voltage:	138 kV
Conductors:	336.4 kcmil 26/7 ACSR
Static Wire:	7#8 Alumoweld
Insulators:	Porcelain and Polymer
ROW Width:	150'
Structure Types:	Exhibit 4: 138 kV Single Circuit Single Pole Laminate Switch Structure 5213A.
	Exhibit 5: 138 kV Single Circuit Three Pole Wood Switch Structure 5214.
	Exhibit 6: 138 kV Single Circuit Single Pole Wood Deadend Structure 12350.

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

There are no occupied residences or institutions within 100 feet from the proposed transmission line 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 capital cost for the proposed project is approximately $863,000.

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

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

The Project is located in the Concord Township, Delaware County, Ohio. The main land use around the Project is industrial, institutional, and agricultural. The Project is located within existing right-of-way, so no changes or impacts to the current land use are anticipated.

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

The project does not impact any agricultural lands or agricultural land use.

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

As part of the investigation for this Construction Notice, ATSI performed a desktop review of the Ohio Historic Preservation Office ("OHPO") online database on February 28, 2023, to identify the existence of any significant archeological or cultural resource sites within 0.5 mile of the Project Area. A map of the results of the search is shown in Exhibit 7.

The OHPO database includes all Ohio listings on 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 indicate that no listed NRHP sites and no NRHP Districts were identified within the Project Area.

The OHPO database also includes listing of the Ohio Archaeological Inventory ("OAI"), the Ohio Historic Inventory ("OHI"), previous cultural resource surveys, and the Ohio Genealogical Society ("OGS") cemetery inventory. Five (5) previous cultural resource surveys were conducted within 0.5 miles of the Project Area and are identified in Table 3. There were 3 structural resources identified within the APE, listed in table 4. There are twenty-four (24) OAI located within the APE listed in table 5. There are zero (0) OGS cemeteries in the APE.

Table 3. List of Previous Cultural & Historic Resource Survey

Year	Name	County
1996	Phase I Archaeological Survey for Ohio Edison Company's Proposed Kirby-Tangy 138 kV Transmission Line in Union and Delaware Counties, Ohio	Delaware
2005	Report of Phase I Cultural Resources Survey for the Proposed City of Columbus Upground Reservoir Site 3, Pump Stations and Pipeline in Thompson, Scioto, Radnor, and Concord Townships, Delaware County, Ohio	Delaware
2006	Cultural Resource Survey Report for the Bellepoint RL Site # A6C0183 Proposed Cellular Tower, SR 257 and US 42, Bellepoint, Concord Township, Delaware County, Ohio	Delaware
2014	Addendum 2: Phase I Archaeological Survey for the London-Tangy 138 KV Electric Transmission Line Project, Delaware, Madison & Union Counties, Ohio.	Delaware
2020	Phase I Archaeological Investigations for the Approximately 26.7 km (16.59 mi) Preferred Route of the Northern Columbus Loop Pipeline Project (Phase VII) in Liberty/Concord Townships, Delaware County, and Mill Creek/ Jerome Townships, Union County, Ohio	Delaware

Table 4. OHI Structural Resources

OHI Number	Present Name	Historic Use	County	Municipality
DEL0017614	Bellepoint Road Bridge	N/A	Delaware	Concord Township
DEL0108914	Peirsol House	Single Dwelling	Delaware	Ostrander
DEL0108814	Peirsol House	Single Dwelling	Delaware	Ostrander

Table 5. OAI Archeological Resources

OAI Number	Affiliation	Description	County	Quad Name
DL0916	Prehistoric and Historic	Unassigned Prehistoric	Delaware	Ostrander
DL0917	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1875	Prehistoric and Historic	Unassigned Prehistoric	Delaware	Shawnee Hills
DL1878	Historic		Delaware	Shawnee Hills
DL1881	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1883	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1884	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1886	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1887	Prehistoric	Unassigned Woodland	Delaware	Ostrander
DL1889	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1891	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL2829	Prehistoric and Historic	Unassigned Prehistoric	Delaware	Ostrander
DL2831	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL0918	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander

DL1876	Prehistoric and Historic	Unassigned Prehistoric	Delaware	Shawnee Hills
DL1877	Prehistoric and Historic	Unassigned Woodland	Delaware	Shawnee Hills
DL1879	Prehistoric	Unassigned Prehistoric	Delaware	Shawnee Hills
DL1880	Historic		Delaware	Shawnee Hills
DL1882	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1885	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1888	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL1890	Prehistoric	Unassigned Prehistoric	Delaware	Ostrander
DL2828	Prehistoric	Paleolithic	Delaware	Shawnee Hills
DL2830	Prehistoric and Historic	Unassigned Prehistoric	Delaware	Ostrander

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

No additional government agency authorizations are expected to be needed for this Project.

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

As part of the investigation, ATSI retained AECOM to conduct the necessary environmental surveys. AECOM submitted a request to the Ohio Department of Natural Resources (ODNR) Office of Real Estate to conduct an Environmental Review on September 9, 2021. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife's Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. The ODNR's Office of Real Estate's response, dated October 8, 2021, indicates that this Project is within the range of twelve state and/or federally listed endangered species. A copy of ODNR's Office of Real Estate's response is included as Exhibit 8.

As part of the investigation, AECOM also submitted a request to the US Fish and Wildlife Service (USFWS) on September 9, 2021, 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 September 20, 2023, is included as Exhibit 9. The response indicated that the Project is within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the federally threatened and state-endangered northern long-eared bat (*Myotis septentrionalis*). A list of all endangered, threatened, and rare species, as identified by ODNR and USFWS, within the range of the Project is provided in Table 6, the USFWS does not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat.

Table 6. List of Endangered, Threatened, and Rare Species.

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Indiana bat	*Myotis sodalis*	Endangered	Endangered	Trees & Forest
Northern long-eared bat	*Myotis septentrionalis*	Threatened*	Endangered	Trees & Forest
Little brown bat	*Myotis lucifugus*	N/A	Endangered	Trees & Forest
Tricolored bat	*Perimyotis subflavus*	N/A	Endangered	Trees & Forest
Rayed Bean	*Villosa fabalis*	Endangered	Endangered	Perennial Stream
Snuffbox	*Epioblasma triquetra*	Endangered	Endangered	Perennial Stream
Rabbitsfoot	*Quadrula cylindrica cylindrica*	Threatened	Threatened	Perennial Stream
Black sandshell	*Ligumia recta*	N/A	Threatened	Perennial Stream
Pondhorn	*Uniomerus tetralasmus*	N/A	Threatened	Perennial Stream

American Bittern	*Botaurus lentiginosus*	N/A	Endangered	Wetlands
Black-crowned night-heron	*Nycticorax nycticorax*	N/A	Threatened	Trees & Wetlands
Lark sparrow	*Chondestes grammacus*	N/A	Endangered	Grasses & Shrubs

* The Northern Long-eared bat has been uplisted to Endangered as of March 31, 2023

The response from the ODNR DOW suggested that a desktop hibernaculum study be performed. AECOM performed this study, attached as Exhibit 11, in October 2021. As a result, no records of underground mines or mine openings were identified within 0.25-mile of the Project. However, one karst feature is located within the survey area and is associated with a vug/spring. Project activities are unlikely to significantly affect any potential hibernacula associated with this karst feature as the proposed clearing activities are associated with minor vegetation removal of saplings, shrubs, and/or minor trimming along the edge of the existing transmission line corridor without any trees being removed. As a result of the minor clearing activities that are anticipated for this proposed Project and the fact that it will take place between the recommended seasonal clearing timeframe of October 1 through March 31 to avoid potential impacts to listed bat species as per the recommendation of the ODNR and USFWS, no impacts to these species are anticipated.

Due to timing of construction, there are no impacts anticipated to the Lark sparrow as its nesting period is May 1 through July 31 and these summer residents normally migrate out of Ohio shortly after their young leave the nest.

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

The ODNR identified O'Shaughnessy Reservoir Park as being within a one mile radius of the Project area. No construction activities related to this Project will be inside the park boundary.

AECOM conducted a wetland and stream assessment of the Project area on October 19, 2021, June 8, 2022, and February 13, 2023. As outlined in Exhibit 10, the Wetland and

Stream Assessment Report dated February 2023, AECOM investigated the structure locations and construction access areas for this Project. No wetlands or streams were identified. Therefore, no impacts are anticipated to the listed reptiles, fish, or birds that inhabit this type of habitat.

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

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

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

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

This Construction Notice is being sent concurrently with docketing to the following officials in the township of Concord, Delaware County, Ohio. A copy will also be provided to the library for public review/reference.

Delaware County

Mr. Jeff Benton, President
Delaware County Commissioner
91 N. Sandusky St.
Delaware, OH 43015

Mr. Gary Merrell
Delaware County Commissioner
91 N. Sandusky St.
Delaware, OH 43015

Ms. Barb Lewis
Delaware County Commissioner
91 N. Sandusky St.
Delaware, OH 43015

Mr. Chris Bauserman
Delaware County Engineer
50 Channing St.
Delaware, OH 43015

Delaware Soil and Water
Conservation District
557 A Sunbury Rd,
Delaware, OH 43015

Township of Concord

Mr. Morgan McIntosh
Concord Township Trustee
7229 Ravenna Rd.
Concord Township, OH 44077

Mr. Jim Teknipp
Concord Township Fiscal Officer
7229 Ravenna Rd.
Concord Township, OH 44077

Mr. Carl Dondorfer
Concord Township Trustee
7229 Ravenna Rd.
Concord Township, OH 44077

Ms. Amy Lucci
Concord Township Trustee
7229 Ravenna Rd.
Concord Township, OH 44077

Library

Mr. Bryan Howard
Library Branch Director
Delaware County District Library
84 E. Winter St.
Delaware, OH 43015

Per OAC Rule 4906-6-07(B), an exemplar copy of notice letters sent to local government officials and to the library have been included with this application as proof of compliance with requirements of OAC Rules 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 Construction Notice application. The link to this website is being provided in accordance with OAC Rule 4906-6-07(B), which requires ATSI to provide the Board with proof of compliance for OAC Rule 4906-6-07(A)(3).

LEGEND:

Project Area

0 1,000 2,000 4,000

Feet

Reference:
USGS Topographical Overlay

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

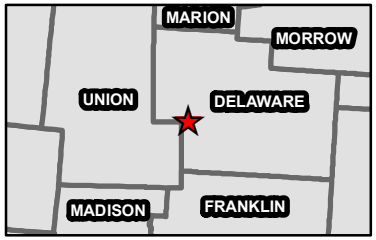

EXHIBIT 1

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

Broadview-Tangy 138 kV Transmission Line
Switch Replacement Project

LEGEND:

- Project Area
- Roads

0 1,000 2,000 4,000

Feet

Reference:
ESRI Aerial Imagery; ODOT

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

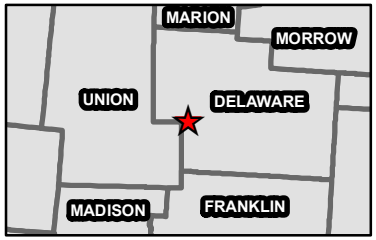

EXHIBIT 2

ATSI®
American Transmission Systems, Inc.
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Broadview-Tangy 138 kV Transmission Line
Switch Replacement Project

LEGEND

- PROPOSED TRANSMISSION STRUCTURE
- EXISTING TRANSMISSION STRUCTURE TO REMAIN
- EXISTING TRANSMISSION STRUCTURE TO BE REMOVED
- EXISTING TRANSMISSION STRUCTURE TO BE MODIFIED
- PROPOSED SWITCH
- SUBSTATION
- DISTRIBUTION POLE
- EXISTING TRANSMISSION LINE TO REMAIN
- TRANSMISSION LINE TO BE REPLACED
- FENCE
- ROADWAY
- UNPAVED ROADWAY
- BUILDING
- ELECTRICAL LINE

0' 80' 160'

HORIZONTAL SCALE IN FEET
1":80'

TANGY SUBSTATION

#280

#5213

SWITCH A-627

#5213A

#281

#12349

#12350

ROUTE 257

STATE

BELLEPOINT SUBSTATION

#282

SWITCH A-631

#5214

#1B

#1A

BROADVIEW-TANGY 138kV LINE

LONDON-TANGY 69kV LINE

#5215

BROADVIEW SUBSTATION

#1

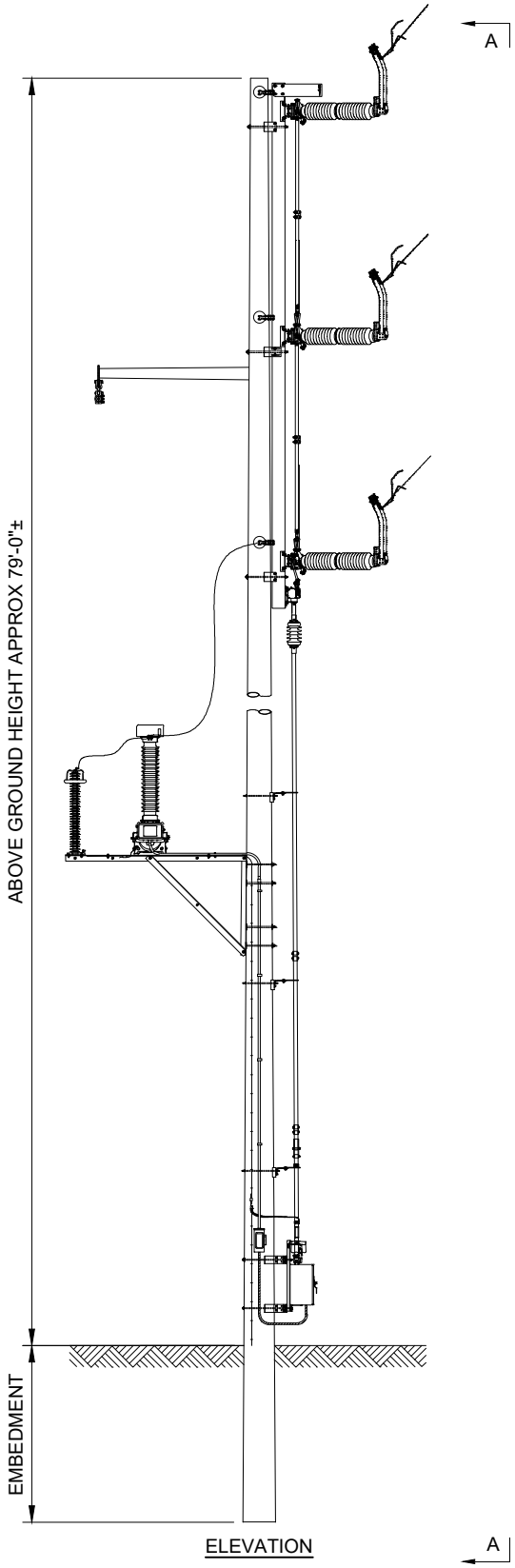
FINLEY-TANGY 138KV ADD AUTOSECTIONALIZING SWITCHES AT BELLEPOINT TAP EX 3

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

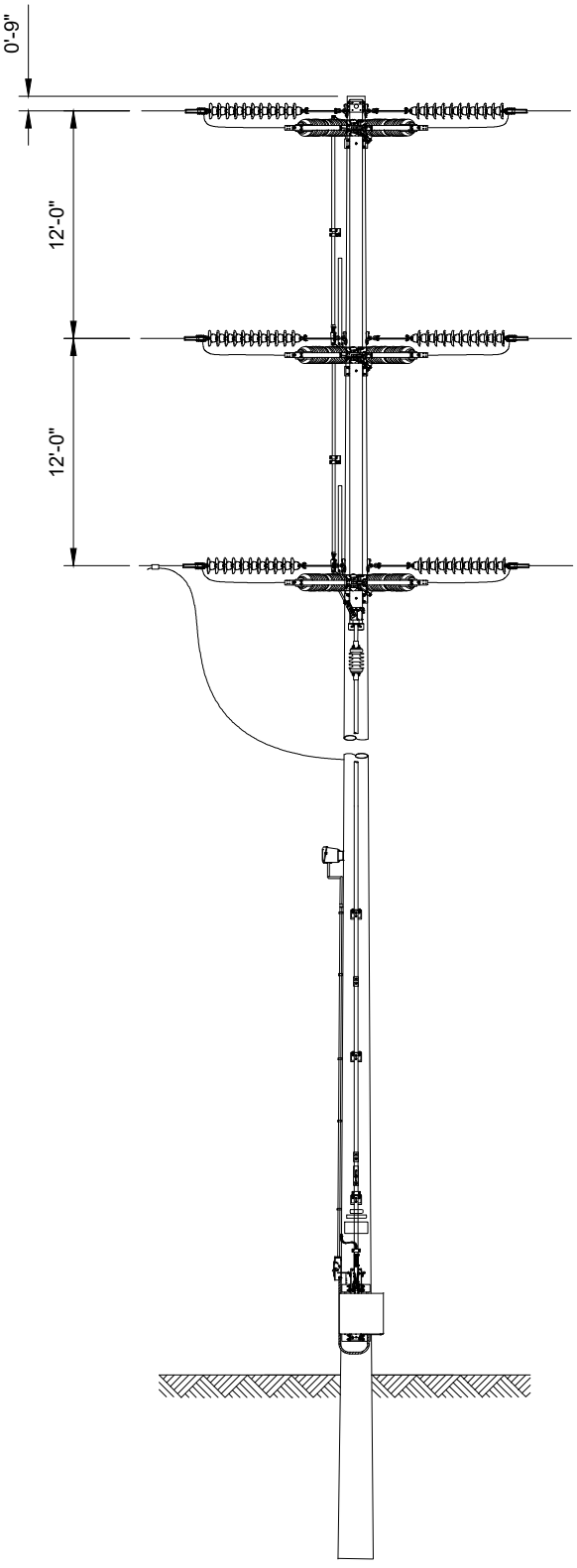
Broadview-Tangy 138 kV Transmission Line Switch Replacement Project

GENERAL LAYOUT

EXHIBIT 3



ELEVATION



SECTION A-A

FINLEY-TANGY 138KV ADD AUTOSECTIONALIZING SWITCHES AT BELLEPOINT TAP EX 4

ATSI®
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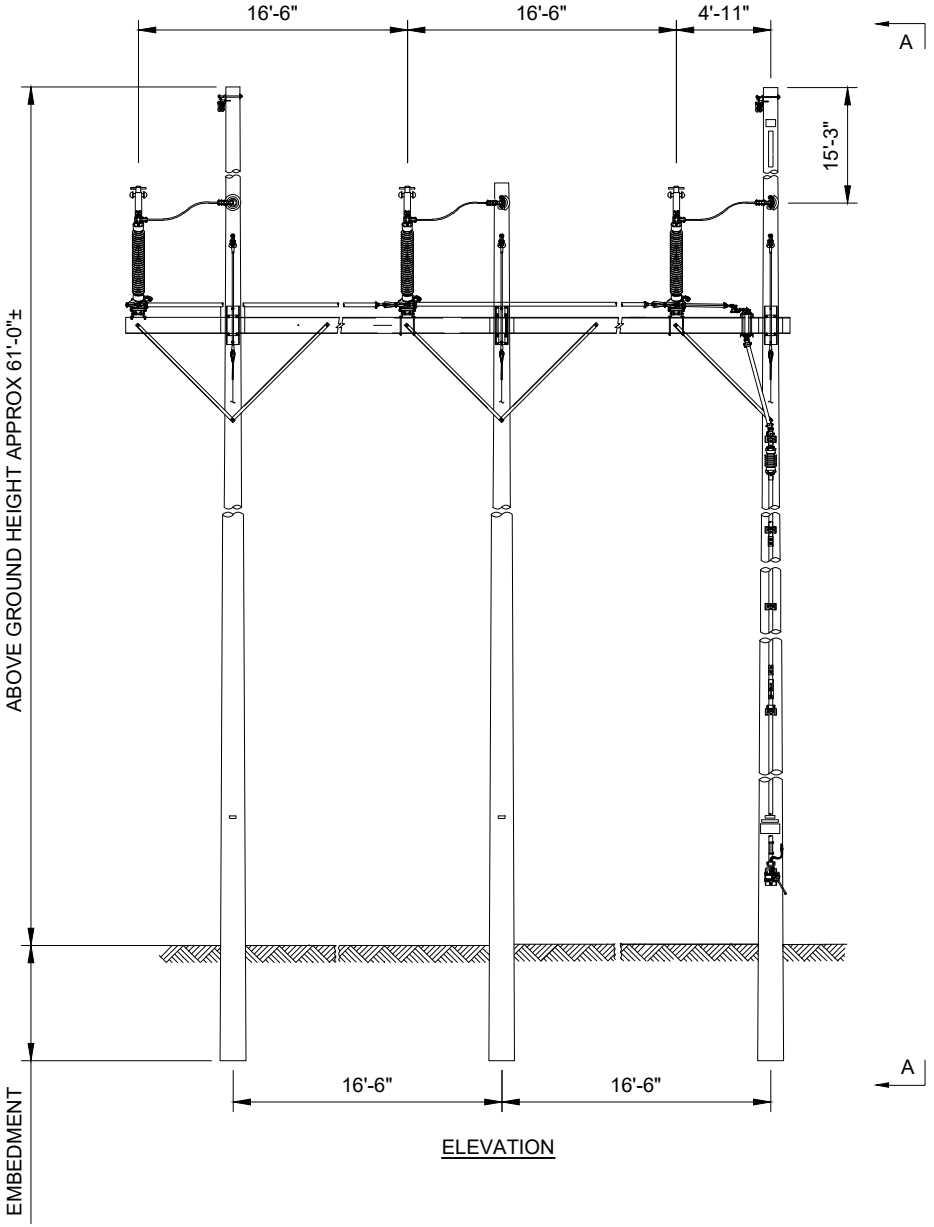
Broadview-Tangy 138 kV Transmission Line
Switch Replacement Project

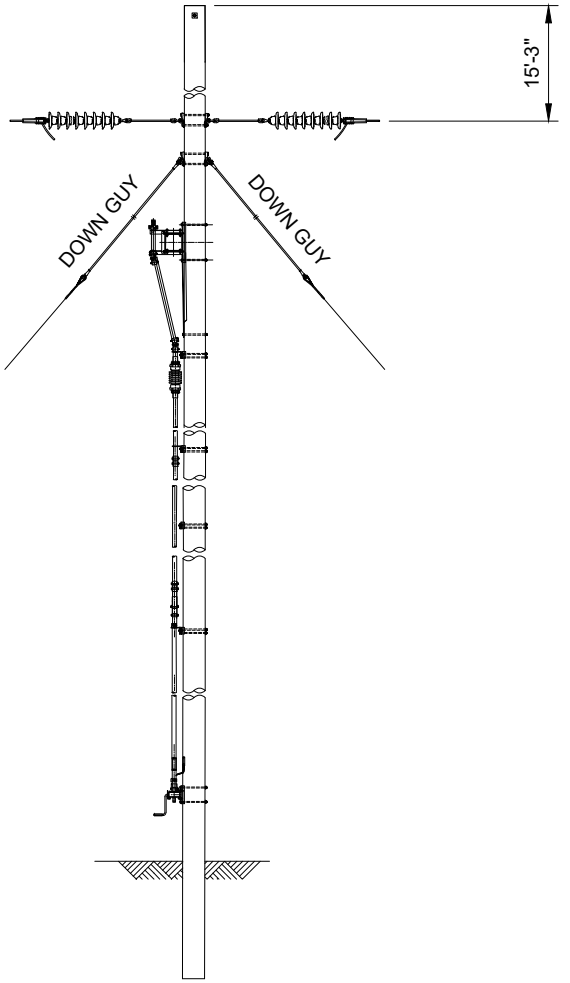
138KV SINGLE CIRCUIT SINGLE POLE LAMINATE
SWITCH STRUCTURE 5213A

EXHIBIT 4

FINLEY-TANGY 138KV ADD AUTOSECTIONALIZING SWITCHES AT BELLEPOINT TAP EX 5



ELEVATION



SECTION A-A

ATSI®
American Transmission Systems, Inc
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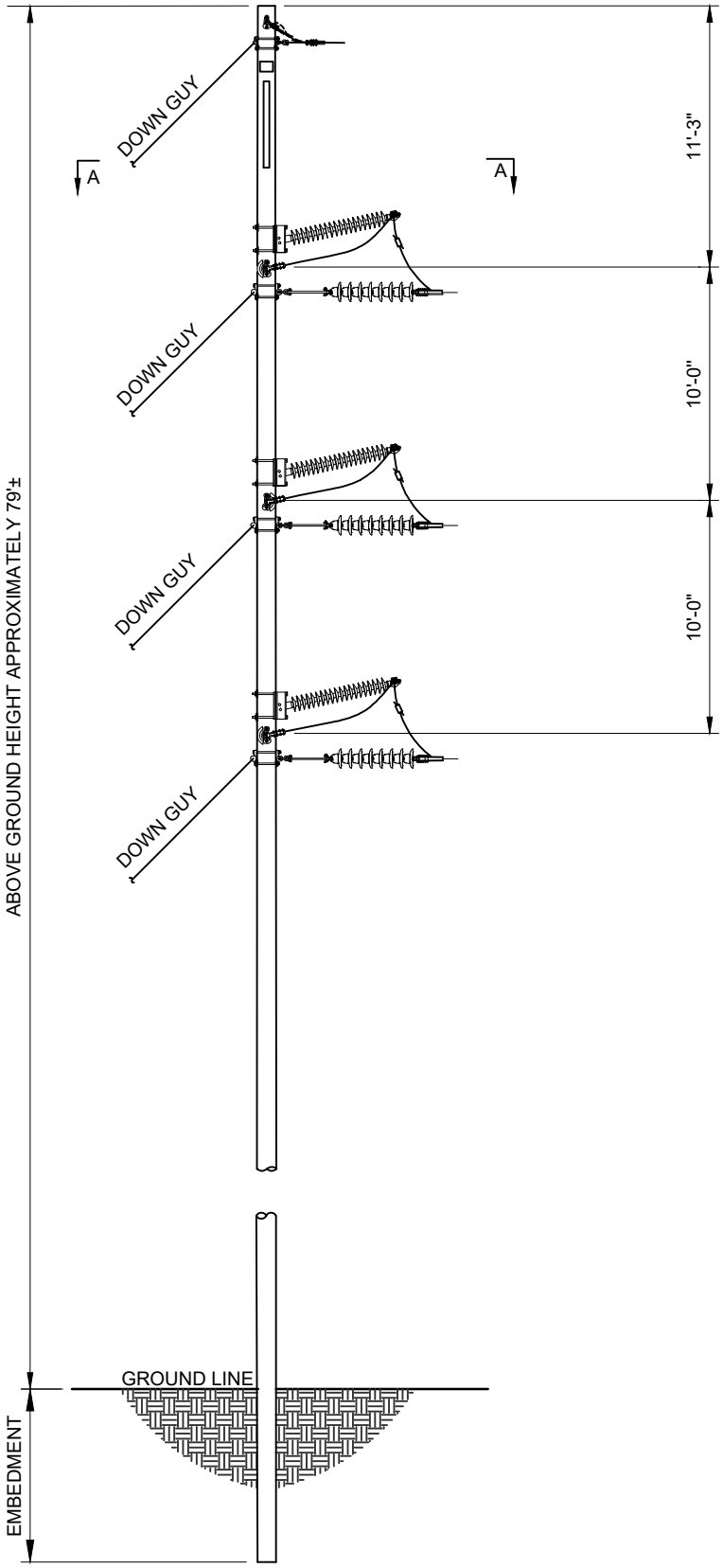
Broadview-Tangy 138 kV Transmission Line
Switch Replacement Project

138KV SINGLE CIRCUIT THREE POLE WOOD SWITCH
STRUCTURE 5214

EXHIBIT 5



ELEVATION

FINLEY-TANGY 138KV ADD AUTOSECTIONALIZING SWITCHES AT BELLEPOINT TAP EX6

SCALE: N.T.S

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

Broadview-Tangy 138 kV Transmission Line
Switch Replacement Project

138kV SINGLE CIRCUIT WOOD POLE STRUCTURE
DEADEND VERTICAL SINGLE POLE

EXHIBIT 6

Exhibit 7

OHIO HISTORY CONNECTION
State Historic Preservation Office

Legend

- NR Listings
  - Listed
  - National Historic Landmark
  - Delisted
- Determinations of Eligibility
  - DOE
  - Demolished
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- Local Designations
- OGS Cemeteries
  - Confident
  - Not Confident
- Historic Markers
- Dams
- UTM Zone Split
- NR Boundaries
- Local Districts
- Previously Surveyed Areas
  - Phase 1
  - Phase 2
  - Phase 3
- Historic Previously Surveyed
- Highways
- Counties
- NPS Parks
- Wayne National Forest

0 0.13 0.3 Miles

1: 10,000

Copyright/Disclaimer

Datum:	[Datum]
Projection:	WGS_1984_Web_Mercator_Auxiliary_Sphere

Exhibit 8

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR MARY MERTZ, DIRECTOR

Office of Real Estate
John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
Fax: (614) 267-4764

October 8, 2021

Brian Miller
AECOM
Foster Plaza 6
681 Andersen Drive, Suite 120
Pittsburgh, Pennsylvania 15220

Re: 21-0832; FirstEnergy - ATSI - Bellepoint Tap 138kV Project

Project: The proposed project has 2 alternatives including installation of a new structure/switch location located between the existing Structure 5214 and State Route 257 or replacing the existing Structure 5213 to accommodate the new switch located east of Structure 5213.

Location: The proposed project is located in Concord Township, Delaware 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: The Natural Heritage Database has the following records at or within a one-mile radius of the project area:

Arbor vitae (*Thuja occidentalis*), P
Elktoe (*Alasmidonta marginata*), SC
Wavy-rayed lampmussel (*Lampsilis fasciola*), SC
Round pigtoe (*Pleurobema sintoxia*), SC
Kidneyshell (*Ptychobranchus fasciolaris*), SC
Sinkhole
O'Shaughnessy Reservoir Park – Columbus Recreation & Parks

The review was performed on the project area specified in the request as well as an additional one mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

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. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federal endangered, and FT = federal threatened.

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 threatened 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 the leaves. 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 cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH $\geq$ 20 if possible. If trees are present within the project area, and trees must be cut 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 cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "*OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING*". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

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

This project is within the range of the following listed mussel species.
Federally Endangered
rayed bean (*Villosa fabalis*)
snuffbox (*Epioblasma triquetra*)

Federally Threatened
rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Threatened
black sandshell (*Ligumia recta*)
pondhorn (*Uniomerus tetralasmus*)
Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact aquatic species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black-crowned night-heron *(Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

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

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

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

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

Mike Pettegrew
Environmental Services Administrator (Acting)

Exhibit 9

Miller, Brian

From: Ohio, FW3 <ohio@fws.gov>
Sent: Thursday, September 16, 2021 1:00 PM
To: Miller, Brian
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate
Subject: [EXTERNAL] ATSI Bellepoint Tap 138kV Project, Delaware County Ohio

Follow Up Flag: Follow up
Flag Status: Flagged

UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994

TAILS# 03E15000-2021-TA-2341

Dear Mr. Miller,

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, we recommend removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see http://www.fws.gov/midwest/endangered/mammals/nleb/index.html), incidental take of Indiana bats is still

prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present. If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

The endangered **rayed bean mussel** (Villosa fabalis) occurs in Mill Creek. The rayed bean is generally known from smaller, headwater creeks, but records exist in larger rivers. They are usually found in or near shoal or riffle areas, and in the shallow, wave-washed areas of lakes. Substrates typically include gravel and sand, and they are often associated with, and buried under the roots of, vegetation, including water willow (Justicia americana) and water milfoil (Myriophyllum sp.). Should the proposed project directly or indirectly impact any of the habitat types described above, we recommend that a survey be conducted to determine the presence or probable absence of rayed bean mussels in the vicinity of the proposed site. Any survey should be designed and conducted in coordination with the Ohio Field Office. Surveyors must have valid Federal and State permits to survey for federally listed mussels in Ohio.

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

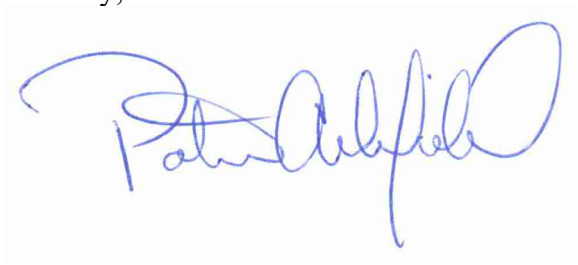
Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing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

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

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

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,



Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW

Exhibit 10

BELLEPOINT TAP PROJECT

WETLAND DELINEATION AND STREAM ASSESSMENT REPORT

Prepared for:
American Transmission Systems, Incorporated
a FirstEnergy Company
76 South Main Street
Akron, Ohio 44308

681 Andersen Drive, Suite 120
Pittsburgh, Pennsylvania 15220, USA

February 2023

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APPENDICES

1.0 INTRODUCTION

American Transmission Systems, Incorporated (ATSI), a FirstEnergy Company (FirstEnergy), is proposing to rebuild the existing 138kV electric transmission line as part of the Bellepoint Tap Project in Delaware County, Ohio. The Project includes the installation of a new structure/switch located between the existing Structure 5214 and State Route 257 and modifications to the existing Structures 5213, 5214, 5215, 12349, and 12350. The approximate coordinates for the start and termination points are West to East, Pole 5215 (40.248269, -83.154718) and Pole 5213 (40.249825, -83.150959) respectively as displayed on **Figure 1.**

AECOM Technical Services, Inc. (AECOM) was retained by ATSI to complete the initial wetland delineation and stream assessment within a 5.51-acre survey area as further defined in **Section 2.0**, which encompasses the Project extent. The purpose of the field survey was to assess for the presence of wetlands, streams, and other waterbodies that may occur within the Project's survey area. Additionally, this report has been prepared to preliminary identify the aquatic features that would likely be considered as either jurisdictional and/or non-jurisdictional "Waters of the United States". However, determination of jurisdictional status of any aquatic features is solely the opinion of AECOM and only the United States Army Corps of Engineers (USACE) is authorized to determine any jurisdiction over WOTUS.

2.0 METHODOLOGY

The wetland delineation and stream assessment was completed within a 5.51-acre survey area, which includes a 150-foot survey corridor centered along the transmission line route, 50-ft survey corridors centered along proposed temporary access roads, and the extent of all pull sites, laydown yards, and other ancillary sites.

On October 18, 2021, AECOM ecologists walked the survey area, access roads, and work areas to conduct the wetland delineation and stream assessment. During the field survey, the physical boundaries of observed water features, if identified, were recorded using sub-meter capable Trimble Global Positioning System (GPS) units or equivalent sub-meter capable GPS unit. The GPS data was imported into ArcMap Geographic Information System (GIS) software, where the data was then reviewed, edited for accuracy, and compiled in a format suitable for inclusion on figures within this report.

2.1 BACKROUND AND EXISTING DATA REVIEW

Prior to conducting field surveys, digital and available published information were reviewed to identify the potential occurrence and location of wetlands and other WOTUS, general land use,

stream classifications, and watershed characteristics within the Project's survey area. The digital and available published information includes:

- Natural Resources Conservation Service (NRCS) soil surveys,
- Aerial Imagery (Past and Present)
- U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps,
- U.S. Geological Survey (USGS) 7.5-minute topographic maps,
- Aquatic Life Habitat Use Designation under Ohio Administrative Code (OAC) Chapter 3745-1,
- Section 401 Water Quality Certification (WQC) for Nationwide Permit and Stream Eligibility Web Map,
- USACE Antecedent Precipitation Tool V1.019, and
- WETS Climatic Data

2.2 WETLAND DELINEATION

AECOM completed the wetland delineation in accordance with USACE *1987 Wetland Delineation Manual (1987 Manual)* (Environmental Laboratory, 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) (Regional Supplement) (USACE, 2010)*. Wetlands were identified due to the presence of three environmental criteria: wetland hydrology, hydrophytic vegetation, and hydric soils. If a wetland was identified, AECOM completed a USACE Wetland Determination Data form (USACE Data form) within each unique wetland habitat to serve as a representative of the wetland hydrology, vegetative community, and soil characteristics. The unique wetland habitats were classified as palustrine emergent (PEM), palustrine forested (PFO), palustrine unconsolidated bottom (PUB), palustrine scrub-shrub (PSS), or other classifications as defined by adhering to the methodology within the Wetlands and Deepwater Habitats of the United States (Cowardin et al. 1979). Adjacent to each wetland complex, AECOM completed an additional USACE Data form as a representative of the upland community. At each wetland data point, AECOM collected photographs in each cardinal direction and of the soil profile. Additionally, USACE Data forms and representative photographs were also taken to represent upland communities only where either areas indicated the potential presence of an aquatic feature based on aerial imagery, two or less wetland criteria were observed, and/or upland characteristics were observed in areas mapped by United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) and/or National Hydrology Dataset (NHD). The representative photographs that display upland communities utilized for comparison of identified wetland complexes can be provided upon request.

In accordance with Ohio Environmental Protection Agency (OEPA), all wetlands were also classified during the wetland delineation utilizing the *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) and associated 10-page ORAM forms were completed for each wetland community. Wetlands scored from 0 to 29.9 are grouped into "Category 1", 30 to 59.9 are "Category 2" and 60 to 100 are "Category 3". Transitional zones exist between “Categories 1 and 2” from 30 to 34.9 and between “Categories 2 and 3” from 60 to 64.9. However, according to the OEPA, if the wetland score falls into the transitional range, it must be given the higher Category unless scientific data can prove it should be in a lower Category (Mack 2001). The ORAM scoring boundaries of the assessed wetlands were identified during the site assessment and separate wetlands scored together in accordance with the ORAM manual. The limits of these ORAM scoring boundaries are included within this report on the 10-page ORAM forms.

Additionally, AECOM completed the initial coordination with the USFWS and Ohio Division of Natural Resources (ODNR) to identify the potential of any state and/or federal listed endangered and/or threatened species “known” to occur within the wetland habitats. Upon receipt of these agencies’ technical assistance, AECOM reviewed the agencies responses with the delineated resources and updated the ORAM forms regarding known presence of listed species. The formal coordination letters from the USFWS and ODNR can be provided upon request.

2.3 STREAM CROSSINGS

Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high-water mark (OHWM). The USACE defines OHWM as “that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas” (USACE 2005). Upon identification of a stream, AECOM assessed the streams using the methods described in the OEPA’s Methods for Assessing Habitat in Flowing Waters: Using OEPA’s *Qualitative Habitat Evaluation Index* (Rankin 2006) and *Field Evaluation Manual for Ohio’s Primary Headwater Habitat Streams, Version 4.1* (Ohio EPA, 2020). Streams associated with watershed area less than or equal to 1.0 mi^2 (259ha), ***and*** a maximum depth of water pools equal to or less than 15.75 inches were evaluated utilizing the HHEI methodology and all other streams assessed as QHEI (Ohio EPA 2018).

2.4 UPLAND DRAINAGE FEATURES

An upland drainage feature (UDF) is a non-jurisdictional drainage that does not meet the criteria of either a jurisdictional stream and/or wetland community. A UDF generally lacks an OHWM

(USACE, 2005) and is equivalent to a swale or an erosional feature as described by the USACE as a generally shallow feature in a landscape that may convey water across upland areas during and/or following storm events. A roadside ditch may also be documented as a UDF if it meets the "not potentially jurisdictional" characterization as described in the Office of Environmental Services Roadway Ditch Characterization Flowchart (Ohio Department of Transportation, 2014). Areas identified during the wetland delineation and stream assessments as UDFs were photographed and documented utilizing a GPS unit and discussed within this report, if observed.

3.0 RESULTS

3.1 BACKGROUND AND EXISTING DATA REVIEW

3.1.1 Description of Project Area's Land Use, Watershed, and Existing Use Classifications

Land uses of the Project area were assigned a general classification based upon the principal land characteristics as observed through aerial photography review and observations during the field surveys. General land use types in the vicinity of the proposed Project include maintained transmission line ROW, agricultural fields, grassy area, and stone lots.

The Project area drains directly into the Scioto River, which eventually flows into the Ohio River. The watersheds identified in the Project area are the Lower Mill Creek Watershed [Hydrologic Unit Code (HUC: 050600010604)] and Moors Run-Scioto River [Hydrologic Unit Code (HUC: 050600010704)]. As per the Section 401 Water Quality Certification (WQC) for Nationwide Permit and Stream Eligibility Web Map website (Ohio Environmental Protection Agency (OEPA)), the Project is located within an Eligible area and impacts to streams, if required, could be authorized by the United States Army Corps of Engineers (USACE) under the Nationwide Permit Conditions. Scioto River has an Ohio Administrative Code (OAC) Chapter 3745-1 aquatic life habitat use designation of Exceptional Water Habitat (EWH) (State of Ohio, 2018).

3.1.2 USFWS National Wetland Inventory and National Hydrology Dataset Review

According to the NWI mapped wetlands and NHD streams located within Shawnee Hills and Ostrander quadrangles, no NWI mapped or NHD streams were identified within the Project Survey Area.

3.1.3 Growing Season and USACE Antecedent Precipitation Tool

The Regional Supplement states that if onsite data gathering is not practical, the growing season can be approximated by the number of days between the average (five years out of ten, or 50 percent probability) date of the last and first 28°F air temperature in the spring and fall,

respectively. The National Weather Service WETS data obtained from the NRCS National Water and Climate Center reveals for Delaware County did not have sufficient data to determine the average growing season. Therefore, AECOM utilized data from the Union County's Marysville Ohio Service Station to identify the growing season in an average year. The growing season in an average year, last from as between April 4 to November 9, or about 219 days. In the Project area, five percent of the growing season equates to approximately eleven days (NRCS 2021b).

In accordance with the Executive Order 13788 on January 23, 2020 and the adjustment of the Navigable Waters Protection Rule by the U.S. Environmental Protection Agency (EPA) and Department of Army (Army), AECOM evaluated the "Typical Year" or normal periodic range of precipitation occurring during the site assessment utilizing the USACE Antecedent Precipitation Tool on October 18, 2021for the area located within the Project area. The results of the tool indicated that the field assessment was completed during normal conditions under the typical climatic conditions for the extent of the survey period (See Appendix C).

3.1.4 Preliminary Soils Evaluation

According to the United States Department of Agricultural (USDA) Natural Resource Conservation (NRCS) Web Soil Surveys, a total of two soil map units are identified and none of the soil map units are identified as hydric soils within the Project Survey Area. During the field assessment of the survey area, AECOM evaluated the locations of hydric soils and inclusions to document the potential of wetlands, waterbodies, and streams. The results of the delineation of these resources are presented in **Section 3.2**. Additionally, a table that provides a detailed overview of all soil series and soil map units is provide in **Table 1** and boundaries of soil map units are displayed on **Figure 2**.

TABLE 1
SOIL MAP UNITS AND DESCRIPTIONS WITHIN PROJECT SURVEY AREA

Soil Series[1]	Symbol[1]	Map Unit Description[1]	Topographic Setting	Hydric[2]	Hydric Component (%)
Milton	MoB	Milton silt loam, 2 to 6 percent slopes	-	No	0%
Milton	MpD2	Milton-Lybrand complex, 12 to 18 percent slopes, eroded	-	No	0%

NOTES:
(1) Data sources include: Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at the following link: http://websoilsurvey.sc.egov.usda.gov/. Accessed [10/18/2021].
(2) Soils that are identified as hydric with an asterisk represent soils with hydric inclusions within the identified topographic settings.

3.2 WETLAND DELINEATION AND STREAM ASSESSMENT

3.2.1 Delineated Wetlands

No wetlands were identified within the Project Survey Area; however, two upland samples were collected to characterize the Project site. Data forms for the upland samples can be found in **Appendix A** and locations of them can be found in **Figure 3**.

3.3 STREAM CROSSINGS

3.3.1 Delineated Streams

No streams were identified in the Project Survey Area.

3.4 UPLAND DRAINAGE FEATURES

No UDFs were surveyed within the Project Survey Area.

3.5 PONDS

No ponds were surveyed within the Project Survey Area.

4.0 SUMMARY

The wetland delineation and stream assessment was completed on October 18, 2021 within the 5.51-acre survey area associated with the Bellepoint Tap Project. During the survey there were no wetlands, streams, or ponds identified within the project area. The USFWS and ODNR provided their responses regarding “known” occurrences of state and/or federal listed endangered and/or threatened species on September 16 and October 8, 2021, respectively. Copies of the agencies’ responses are provided can be provided upon request.

The information contained in this wetland delineation report is for a study area that may be much larger than the actual Project limits-of-disturbance; therefore, lengths and acreages listed in this report may not constitute the actual impacts of the Project defined in subsequent permit applications. If necessary, a separate report that identifies the actual Project impacts will be provided with agency submittals.

The field survey results presented herein apply to the existing and reasonably foreseeable site conditions at the time of our assessment. They cannot apply to site changes of which AECOM is

unaware and has not had the opportunity to review. Changes in the condition of a property may occur with time due to natural processes or human impacts at the Project site or on adjacent properties. Changes in applicable standards may also occur because of legislation or the expansion of knowledge over time. Accordingly, the findings of this report may be invalidated, wholly or in part, by changes beyond the control of AECOM.

5.0 REFERENCES

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FIGURES

Date Saved: 2/16/2023 Document Path: L:\DCS\Projects\IMS\FIRSTENERGY\OHIO_Projects\60663812_FE_BELLTAP\Maps\WDR\BelleTap_WDR_Fig1_Overview.mxd

DELAWARE COUNTY

UNION COUNTY

Pole 5213A
40.24944
-83.151909

Pole 5214
40.249098
-83.152745

Bellepoint

Klondike

Mill Creek Cem

Gaging Sta

Scioto Valley Ch

Oller Cem

Basic Cem

RIVER

SCIOTO

MILL CREEK

CONCORD

LEGEND

- Proposed Bellepoint Tap Transmission Line
- AECOM Survey Area
- County Boundary

0 0.5 1
Miles

BASE MAP SOURCE:
ArcGIS Online, USA Topo Maps

ATSI

Bellepoint Tap Project

FIGURE 1
OVERVIEW MAP

JOB NO. 60663812

AECOM

Gwg1B1
Gwg5C2
LyD2
MoB
MpD2
ScB
LoA
MoC2
PFO1A
PFO1C
R2UBH
W
Scioto River
Mill Creek
257
Turnaround 1
Approx 50' x 50'
5213
5213A
BEL-02
BEL-03
12349
12350
5214
5215
5216
Laydown Yard 1
0.32 acres
Substa
Bellepoint

LEGEND

- Existing Structure
- Existing to be Modified
- Proposed New Switch
- Access Entrance
- Existing Access Road
- Proposed Tempoary Access Road
- Existing Transmission Line
- Proposed Bellepoint Tap
- NHD Streams
- Turn Around
- Laydown Yard
- National Wetland Inventory (NWI)
- Soils Map Unit
- Bellepoint Tap Project Corridor
- AECOM Survey Area

0 200 400
Feet

BASE MAP SOURCE:
ArcGIS Online, ESRI World Imagery (Clarity)

ATSI
Bellepoint Tap Project

FIGURE 2
SOIL MAP UNIT AND NATIONAL WETLANDS INVENTORY MAP

JOB NO. 60663812

AECOM

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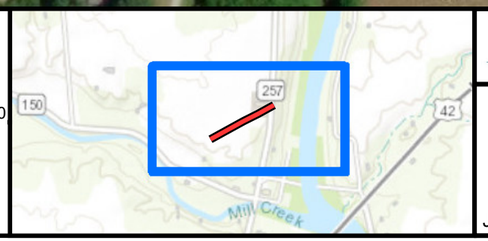
UPL-MRK-001
BEL-02
12349
5213A
5214
BEL-03
12350
UPL-MRK-002

LEGEND

- Access Entrance
- Existing Substation
- Existing Structures
- Upland Data Point
- Proposed Bellepoint Tap 138 kV Transmission Line
- Existing Transmission Line
- Existing Access Road
- Proposed Tempoary Access Road
- Laydown Yard
- Turn Around
- Industrual (Brookside) 69kV 50ft Project Corridor
- AECOM Survey Area

0 200 400
Feet

BASE MAP SOURCE:
ArcGIS Online, ESRI World Imagery (Clarity)



ATSI

Bellepoint Tap Project

FIGURE 3
WETLAND DELINEATION AND STREAM ASSESSMENT MAP

JOB NO. 60662474

AECOM

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APPENDIX A

U.S. ARMY CORPS OF ENGINEERS UPLAND FORMS

WETLAND DETERMINATION DATA FORM - Midwest Region

Project/Site: Bellepoint Tap 138 kV Line Rebuild Project City/County: Delaware Sampling Date: 18-Oct-21

Applicant/Owner: FirstEnergy State: OH Sampling Point: UPL-MRK-001

Investigator(s): M.R.Kline, C.Wyse Section, Township, Range: S T R

Landform (hillslope, terrace, etc.): Hillside Local relief (concave, convex, none): convex

Slope: 2.0% / 1.1 ° Lat.: 40.24975067 Long.: -83.15072805 Datum: WGS84

Soil Map Unit Name: MpD2: Milton-Lybrand complex, 12 to 18 percent slopes, eroded NWI classification: NA

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

Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ◉ No ○

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

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

Hydrophytic Vegetation Present?	Yes ○ No ◉	Is the Sampled Area within a Wetland? Yes ○ No ◉
Hydric Soil Present?	Yes ○ No ◉	
Wetland Hydrology Present?	Yes ○ No ◉	

Remarks:
Upland data point collected within the existing transmission line right-of-way. The right-of-way is dominated by shrubs. The area is surrounded by forest land.

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: None)	Absolute % Cover	Dominant Species?	Rel.Strat. Cover	Indicator Status
1.	0	☐	0.0%	
2.	0	☐	0.0%	
3.	0	☐	0.0%	
4.	0	☐	0.0%	
5.	0	☐	0.0%	0
	0	= Total Cover		
Sapling/Shrub Stratum (Plot size: 15' radius)				
1. Lonicera morrowii	70	☑	77.8%	FACU
2. Rhus typhina	20	☑	22.2%	UPL
3.	0	☐	0.0%	
4.	0	☐	0.0%	
5.	0	☐	0.0%	
	90	= Total Cover		
Herb Stratum (Plot size: 5' radius)				
1. Dactylis glomerata	75	☑	57.7%	FACU
2. Solidago canadensis	25	☐	19.2%	FACU
3. Cirsium arvense	10	☐	7.7%	FACU
4. Daucus carota	10	☐	7.7%	UPL
5. Taraxacum officinale	10	☐	7.7%	FACU
6.	0	☐	0.0%	
7.	0	☐	0.0%	
8.	0	☐	0.0%	
9.	0	☐	0.0%	
10.	0	☐	0.0%	
	130	= Total Cover		
Woody Vine Stratum (Plot size: None)				
1.	0	☐	0.0%	
2.	0	☐	0.0%	
	0	= Total Cover		

Dominance Test worksheet:

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

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

Percent of dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	190	x 4 =	760
UPL species	30	x 5 =	150
Column Totals:	220 (A)		910 (B)

Prevalence Index = B/A = 4.136

Hydrophytic Vegetation Indicators:

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

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

Hydrophytic Vegetation Present? Yes ○ No ◉

Remarks: (Include photo numbers here or on a separate sheet.)
Vegetation does not meet hydrophytic conditions.

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

SOIL

Sampling Point: **UPL-MRK-001**

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

Depth (inches)	Matrix Color (moist)		%	Redox Features Color (moist)		%	Type[1]	Loc[2]	Texture	Remarks
0-16	10YR	3/3	100						Silt Loam	25% mixed rock

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

Hydric Soil Indicators:

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

Indicators for Problematic Hydric Soils [3]:

- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7)
- ☐ Iron Manganese Masses (F12)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

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

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? **Yes** ○ **No** ◉

Remarks:

Due to the absence of hydrology, hydrophytic vegetation, and hydric soils, it was determined the area does not meet the federal definition of a wetland.

HYDROLOGY

Wetland Hydrology Indicators:

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

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

Secondary Indicators (minimum of two required)

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

Field Observations:

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

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

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

Wetland Hydrology Present? **Yes** ○ **No** ◉

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

NA

Remarks:

No source of hydrology was observed.

WETLAND DETERMINATION DATA FORM - Midwest Region

Project/Site: Bellepoint Tap 138 kV Line Rebuild Project City/County: Delaware Sampling Date: 18-Oct-21

Applicant/Owner: FirstEnergy State: OH Sampling Point: UPL-MRK-002

Investigator(s): M.R.Kline, C.Wyse Section, Township, Range: S T R

Landform (hillslope, terrace, etc.): Ridgetop Local relief (concave, convex, none): convex

Slope: 1.0% / 0.6 ° Lat.: 40.24868638 Long.: -83.15371845 Datum: WGS84

Soil Map Unit Name: MoB: Milton silt loam, 2 to 6 percent slopes NWI classification: NA

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

Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ◉ No ○

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

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

Hydrophytic Vegetation Present?	Yes ○ No ◉	Is the Sampled Area within a Wetland? Yes ○ No ◉
Hydric Soil Present?	Yes ○ No ◉	
Wetland Hydrology Present?	Yes ○ No ◉	

Remarks:
Upland data point collected within the existing transmission line right-of-way. The right-of-way is dominated by grasses and herbaceous vegetation, and is surrounded by active hay fields.

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: None)	Absolute % Cover	Dominant Species?	Rel.Strat. Cover	Indicator Status
1.	0	☐	0.0%	
2.	0	☐	0.0%	
3.	0	☐	0.0%	
4.	0	☐	0.0%	
5.	0	☐	0.0%	0
	0		= Total Cover	
Sapling/Shrub Stratum (Plot size: None)				
1.	0	☐	0.0%	
2.	0	☐	0.0%	
3.	0	☐	0.0%	
4.	0	☐	0.0%	
5.	0	☐	0.0%	
	0		= Total Cover	
Herb Stratum (Plot size: 5' radius)				
1. Trifolium pratense	75	☑	45.5%	FACU
2. Taraxacum officinale	25	☑	15.2%	FACU
3. Dactylis glomerata	20	☐	12.1%	FACU
4. Setaria pumila	20	☐	12.1%	FAC
5. Daucus carota	10	☐	6.1%	UPL
6. Solidago canadensis	10	☐	6.1%	FACU
7. Cirsium arvense	5	☐	3.0%	FACU
8.	0	☐	0.0%	
9.	0	☐	0.0%	
10.	0	☐	0.0%	
	165		= Total Cover	
Woody Vine Stratum (Plot size: None)				
1.	0	☐	0.0%	
2.	0	☐	0.0%	
	0		= Total Cover	

Dominance Test worksheet:

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

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

Percent of dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	20	x 3 =	60
FACU species	135	x 4 =	540
UPL species	10	x 5 =	50
Column Totals:	165 (A)		650 (B)

Prevalence Index = B/A = 3.939

Hydrophytic Vegetation Indicators:

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

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

Hydrophytic Vegetation Present? Yes ○ No ◉

Remarks: (Include photo numbers here or on a separate sheet.)
Vegetation does not meet hydrophytic conditions.

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

SOIL

Sampling Point: **UPL-MRK-002**

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

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Redox Features Type[1]	Redox Features Loc[2]	Texture	Remarks
0-16	10YR 3/3	100					Silt Loam	25% mixed rock

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

Hydric Soil Indicators:

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

Indicators for Problematic Hydric Soils [3]:

- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7)
- ☐ Iron Manganese Masses (F12)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

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

Restrictive Layer (if observed):

Type:

Depth (inches):

Hydric Soil Present? **Yes** ○ **No** ◉

Remarks:

Due to the absence of hydrology, hydrophytic vegetation, and hydric soils, it was determined the area does not meet the federal definition of a wetland.

HYDROLOGY

Wetland Hydrology Indicators:

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

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

Secondary Indicators (minimum of two required)

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

Field Observations:

Surface Water Present? Yes ○ No ◉ Depth (inches):

Water Table Present? Yes ○ No ◉ Depth (inches):

Saturation Present? (includes capillary fringe) Yes ○ No ◉ Depth (inches):

Wetland Hydrology Present? **Yes** ○ **No** ◉

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

NA

Remarks:

No source of hydrology was observed.

APPENDIX B

REPRESENTATIVE UPLAND PHOTOGRAPHS

AECOM

PHOTOGRAPHIC RECORD
Upland

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:

October 18, 2021

Description:

UPL-MRK-001

North

Date:

October 18, 2021

Description:

UPL-MRK-001

South

AECOM

PHOTOGRAPHIC RECORD
Upland

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:

October 18, 2021

Description:

UPL-MRK-001

East

Date:

October 18, 2021

Description:

UPL-MRK-001

West

AECOM

PHOTOGRAPHIC RECORD
Upland

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

UPL-MRK-001

Soil

Date:

October 18, 2021

Description:

UPL-MRK-002

North

AECOM

PHOTOGRAPHIC RECORD
Upland

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

UPL-MRK-002

South

Date:

October 18, 2021

Description:

UPL-MRK-002

East

AECOM

PHOTOGRAPHIC RECORD
Upland

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

UPL-MRK-002

West

Date:

October 18, 2021

Description:

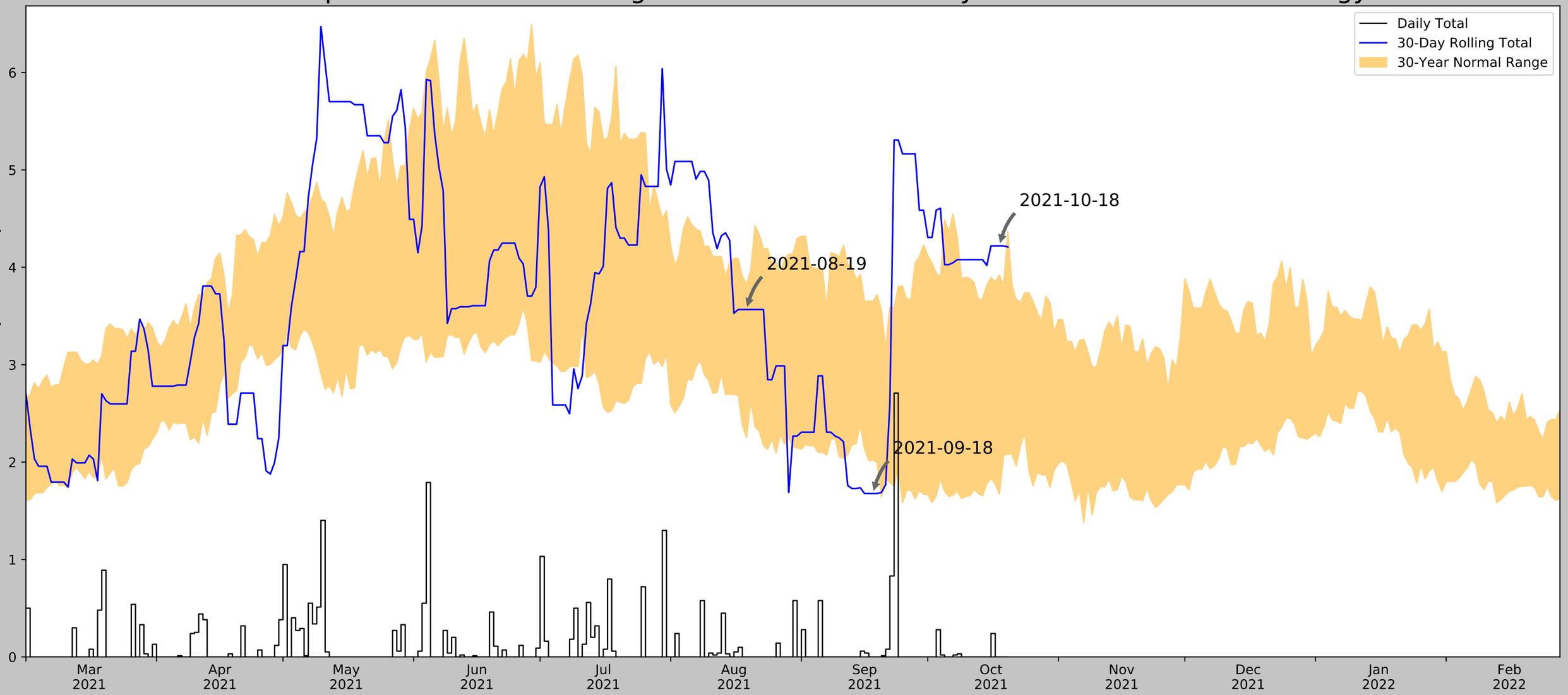
UPL-MRK-002

Soil

APPENDIX C

ANTECEDENT PRECIPITATION TOOL

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



Coordinates	40.24975067, -83.15072805
Observation Date	2021-10-18
Elevation (ft)	888.84
Drought Index (PDSI)	Incipient wetness (2021-09)
WebWIMP H_2O Balance	Wet Season

30 Days Ending	30^{th} %ile (in)	70^{th} %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2021-10-18	1.670472	3.921654	4.220473	Wet	3	3	9
2021-09-18	2.022835	3.651969	1.677165	Dry	1	2	2
2021-08-19	2.252756	3.829528	3.566929	Normal	2	1	2
Result							Normal Conditions - 13

Figure and tables made by the **Antecedent Precipitation Tool** Version 1.0

Written by Jason Deters
U.S. Army Corps of Engineers

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days (Normal)	Days (Antecedent)
MARYSVILLE	40.1939, -83.2675	970.144	7.269	81.304	3.862	11173	89
DELAWARE 1.9 ESE	40.2886, -83.0485	923.885	6.021	35.045	2.92	3	1
DELAWARE	40.3175, -83.0739	919.948	6.19	31.108	2.978	59	0
DUBLIN 0.7 WNW	40.122, -83.1447	902.887	8.832	14.047	4.099	102	0
DELAWARE LAKE	40.3583, -83.0703	923.885	8.615	35.045	4.178	6	0
DUBLIN 3.2 ENE	40.1299, -83.0742	895.997	9.214	7.157	4.212	7	0
WESTERVILLE	40.1267, -82.9442	801.837	13.824	87.003	7.424	3	0

Exhibit 11

BELLEPOINT TAP PROJECT

DESKTOP ASSESSMENT FOR WINTER BAT HABITAT

Prepared for:
American Transmission Systems, Inc.
a FirstEnergy Company
76 South Main Street
Akron, Ohio 44308

525 Vine Street, Suite 1800
Cincinnati, Ohio 45202

November 2021

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF ATTACHMENTS

1.0 INTRODUCTION

American Transmission Systems, Incorporated (ATSI), a FirstEnergy Company (FirstEnergy), is proposing to rebuild the existing 138kV electric transmission line as part of the Bellepoint Tap Project in Delaware County, Ohio. The Project includes the installation of a new structure/switch located between the existing Structure 5214 and State Route 257 and modifications to the existing Structures 5213A, 5214, 5215, 12349, and 12350.The Project is located on Shawnee Hills and Ostrander, U.S. Geologic Survey 7.5" topographic quadrangle (Appendix A, Figure 1 – Agency Overview Map).

The Project is designed to be predominately within the former maintained communication line ROW located mostly within agricultural fields, grassy area, and stone lots. ATSI plans to utilize existing access roads and travel lanes along the transmission line ROW to the extent practicable. The Project is not expected to require substantial clearing of forested habitat, although minor tree trimming along the edge of the Project Corridor may occur. ATSI intends for tree clearing activities to occur between October 1st and March 31st to avoid adverse effects to state and/or federally listed bat species.

On behalf of ATSI, AECOM completed the wetland delineation and stream assessment on October 18th, 2021. The extent of the wetland delineation and stream assessment conducted by AECOM is defined throughout this Wetland Delineation and Stream Assessment Report as the AECOM survey area. The survey area completed by AECOM includes a 100-ft offset of the proposed transmission lines and 50-ft corridor centered along proposed temporary access roads.

The Project area drains directly into the Scioto River, which eventually flows into the Ohio River. The watersheds identified in the Project area are the Lower Mill Creek Watershed (Hydrologic Unit Code [HUC] 050600010604). Under the Ohio Administrative Code (OAC) Chapter 3745-1 aquatic life habitat use designation lists Scioto River as an Exceptional Water Habitat (EWH).

2.0 METHODS

AECOM reviewed publicly available data to identify underground voids which could be potential hibernation sites for overwintering bats (hibernacula). Typical hibernation sites for the *Myotis* bats native to Ohio include natural karst caves/sinkholes, underground mines with exposed entrances/air vents, and other underground voids which maintain suitable temperatures, humidity, and air circulation throughout the winter months. To identify such features, AECOM reviewed the following desktop resources:

- USGS topographical maps (U.S. Geological Survey, 2019)
- Aerial photography (ESRI, 2020)
- USFWS Technical Assistance (Attachment B)
- ODNR Division of Mineral Resources and Geological Survey data for:

- Known mining activity (ODNR, 2020a)
- Karst geology and sinkholes (ODNR, 2020b)

AECOM compared the Project area and ¼-mile buffer to the information provided by each of these resources and reviewed them for indications of likely underground voids. Figure 2 – USGS Topographical Map shows the Project and it's ¼-mile buffer on a USGS background. Figure 3 – Known Mining Activity Map depicts the Project and it's ¼-mile buffer in relation to known records of mining activity as recorded by the ODNR. Figure 4 – Karst Geology and Sinkholes Map depicts the Project and it's ¼-mile buffer with known locations of karst geology and sinkholes. Aerial photography is shown as the background in Figure 3 and Figure 4.

3.0 RESULTS

Based on the available desktop resources, no documented underground mines or mine entrances/openings are within ¼-mile of the Project. ODNR mining records indicate that Industrial Minerals, historic and active mines are present around the Project to the North; however, those features are approximately 1.0 to 1.3 miles away (Figure 3 – Known Mining Activity Map).

Review of the ODNR Karst Interactive Map identified one karst feature within 0.25-mile of the Project area (Figure 4 – Karst Geology and Sinkholes Map). This karst (ID: 340419044842) was field verified by the ODNR as a vug or spring cut into limestone of a house foundation.

4.0 CONCLUSION AND DISCUSSION

AECOM completed the due diligence winter bat habitat desktop in October 2021. As result, no records of underground mines or mine openings were identified within 0.25-mile of the Project. Additionally, one karst feature is located within the survey area and is associated with a vug/spring. Project activities are unlikely to significantly affect any potential hibernacula associated with this karst feature as the proposed clearing activities are associated with minor vegetation removal of saplings, shrubs, and/or minor trimming along the edge of the existing transmission line corridor without any trees being removed. Therefore, representative photographs of the habitat within the Project area are provided as Attachment C and locations of photographs are displayed on Appendix A, Figure 5: Photograph Location Map. As per ODNR DOW coordination, AECOM recommends submittal of the desktop assessment to Erin Hazelton for confirmation of Project recommendations.

Brian Cooper, Senior Environmental Scientist, USFWS Qualified Bat Surveyor

5.0 LITERATURE CITED

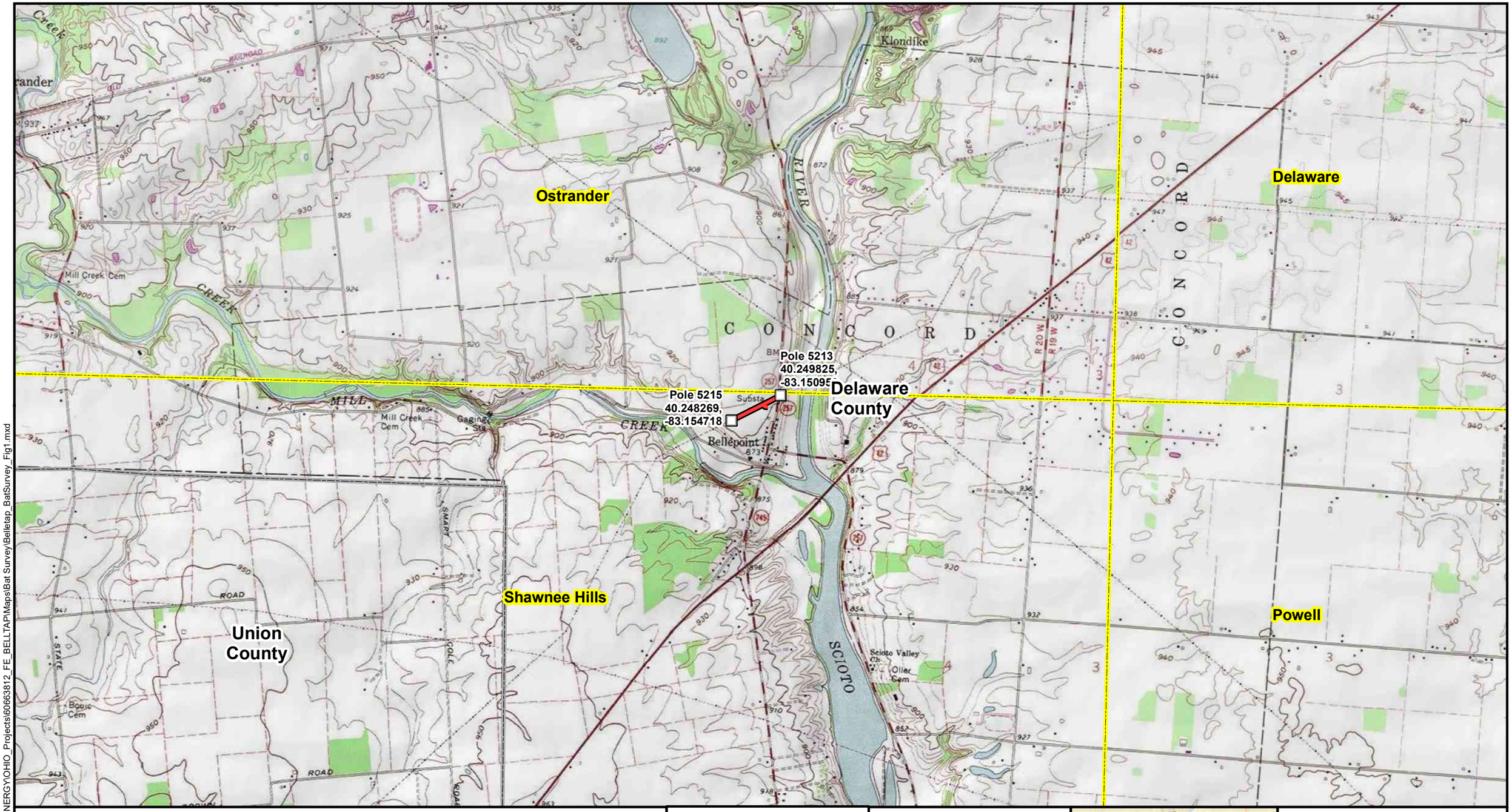
ESRI, 2020. World Imagery obtained from Earthstar Geographics (TerraColor NextGen) imagery.

Ohio Department of Natural Resources. 2020a. Division of Mineral Resources and Geological Survey, Mines of Ohio Interactive Map access at https://gis.ohiodnr.gov/MapViewer/?config=OhioMines on October 28, 2021.

Ohio Department of Natural Resources. 2020b. Division of Geological Survey, Karst Interactive Map access at https://gis.ohiodnr.gov/website/dgs/karst_interactivemap/ on October 28, 2021.

U.S. Geological Survey, 2019. USGS US Topo 7.5-minute maps for Shawnee Hills and Ostrander, OH 2019: USGS - National Geospatial Technical Operations Center (NGTOC).

FIGURES



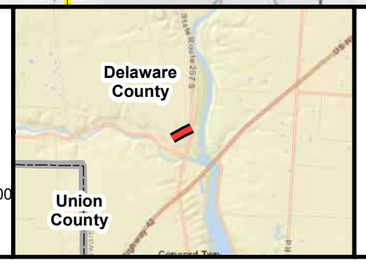
Legend

- Existing Structure
- Proposed Bellepoint Tap Transmission Line
- Ohio USGS 7.5" Topographical Quandrangle
- County Boundary

NOTES
- USGS Shawnee Hills & Ostrander Quadrangles

N

0 2,000 4,000
Feet



ATSI

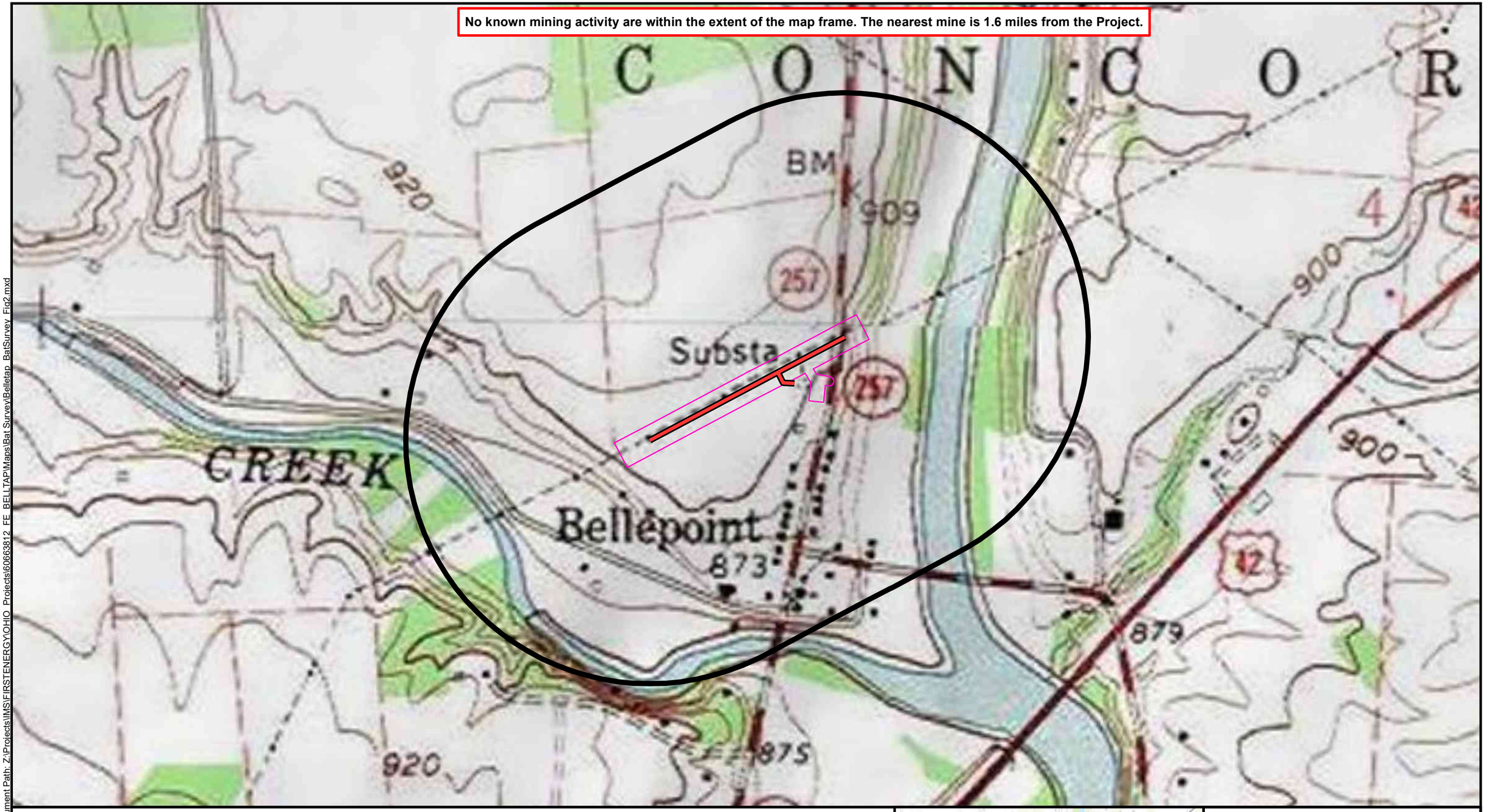
Bellepoint Tap Project

URS Path: Z:\Projects\MS\FIRSTENERGY\OHIO_Projects\60663812_FE_BELLTAP\Maps\Bat Survey\Belletap_BatSurvey_Fig1.mxd

Source: BMCD, ESRI, FEMA, NWI, NHD, Bing Map Hybrid

Issued: November 12, 2021

No known mining activity are within the extent of the map frame. The nearest mine is 1.6 miles from the Project.

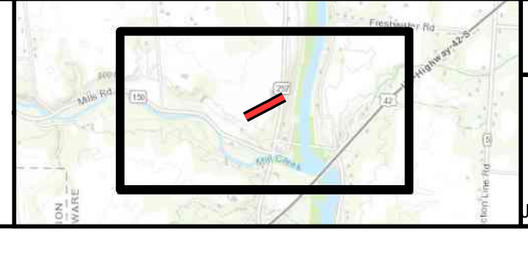


LEGEND

- Proposed Bellepoint Tap Transmission Line
- Survey Area Quarter Mile Buffer
- Survey Boundary

0 500 1,000
Feet

BASE MAP SOURCE:
ArcGIS Online, USA Topo Maps



ATSI *Bellepoint Tap Project*

FIGURE 2
USGS TOPOGRAPHICAL MAP

JOB NO. 60663812

AECOM

Date Saved: 11/12/2021 Document Path: Z:\Projects\IMS\FIRSTENERGY\OHIO_Projects\60663812_FE_BELLTAP\Maps\Bat Survey\Belletap_BatSurvey_Fig2.mxd

No known mining activity are within the extent of the map frame. The nearest mine is 1.6 miles from the Project.

Document Path: Z:\Projects\IMS\FIRSTENERGY\OHIO Projects\60663812_FE_BELLTAP\Maps\Bat Survey\Belletap_BatSurvey_Fig3.mxd

Date Saved: 11/12/2021

LEGEND

- Proposed Bellepoint Tap Transmission Line
- Survey Area Quarter Mile Buffer
- Survey Boundary

0 1,000 2,000
Feet

BASE MAP SOURCE:
ArcGIS Online, USA Topo Maps

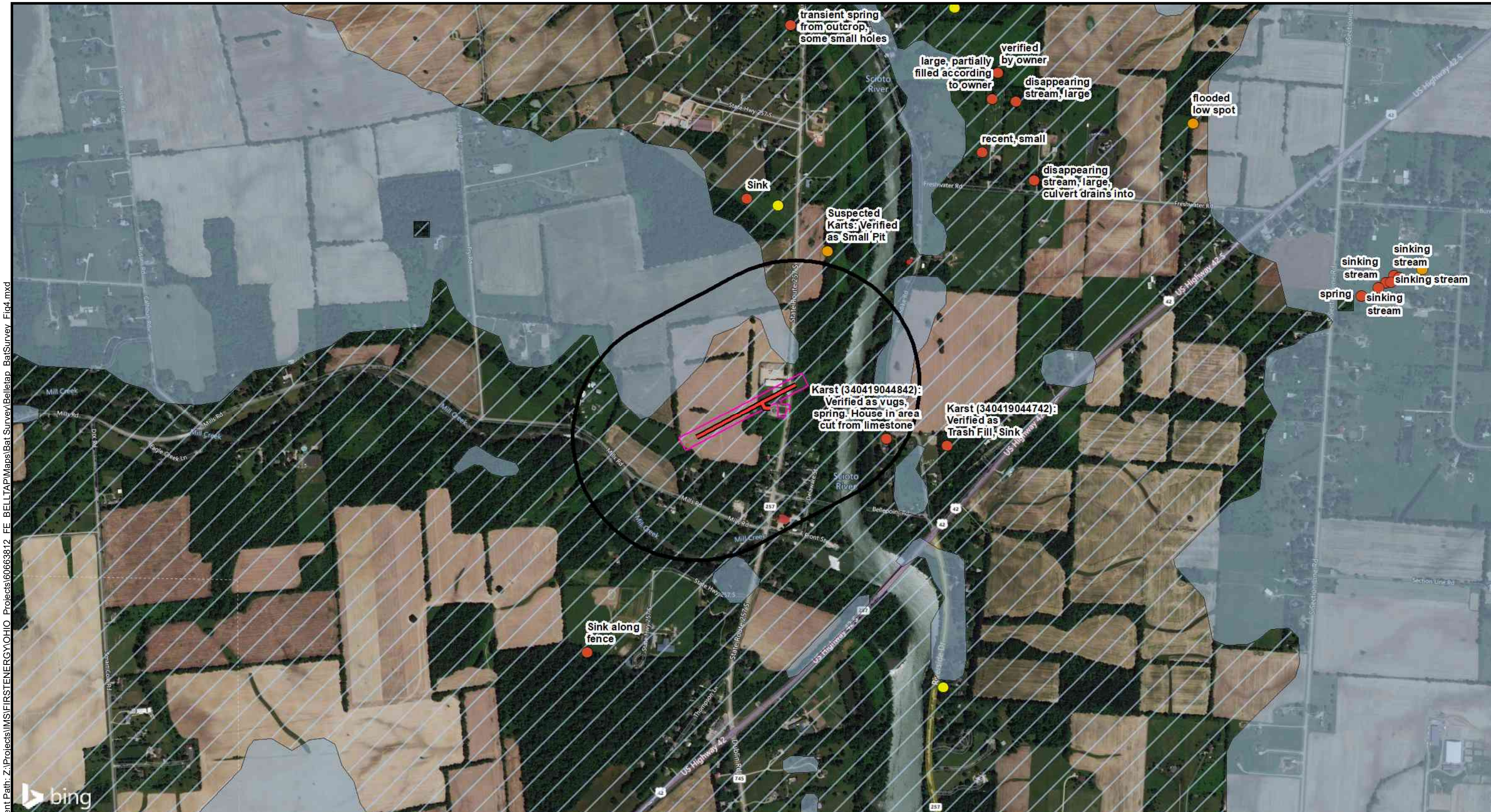
ATSI

Bellepoint Tap Project

FIGURE 3
KNOWN MINING ACTIVITY MAP

JOB NO. 60663812

AECOM



LEGEND

- Proposed Bellepoint Tap Transmission Line
- Survey Area Quarter Mile
- Karst - Field Verified
- Karst - Suspect - Field Visited
- Karst - Suspect - Not Visited

Karst Geology

- Silurian- and Devonian-age carbonate bedrock overlain by less than 20 feet of glacial drift and/or alluvium
- Silurian- and Devonian-age carbonate bedrock overlain by more than 20 feet of glacial drift and/or alluvium

0 1,000 2,000
Feet

BASE MAP SOURCE:
ArcGIS Online, USA Topo Maps

ATSI

Bellepoint Tap Project

FIGURE 4
KARST GEOLOGY AND SINKHOLES MAP

JOB NO. 60663812

AECOM

Document Path: Z:\Projects\IMS\FIRSTENERGY\OHIO_Projects\60663812_FE_BELLTAP\Maps\Bat Survey\Belletap_BatSurvey_Fig4.mxd

Date Saved: 11/12/2021

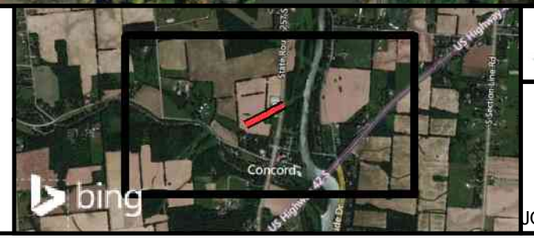
PH-02
PH-01
PH-05
PH-04
PH-06
PH-03

LEGEND

- Photo Location
- Proposed Bellepoint Tap Transmission Line
- Survey Area Quarter Mile

0 500 1,000
Feet

BASE MAP SOURCE:
ArcGIS Online, USA Topo Maps



ATSI

Bellepoint Tap Project

FIGURE 5
PHOTOGRAPH LOCATION MAP

JOB NO. 60663812

AECOM

Date Saved: 11/12/2021 Document Path: Z:\Projects\IMS\FIRSTENERGY\OHIO Projects\60663812 FE BELLTAP\Maps\Bat Survey\Belletap_BatSurvey_Fig5.mxd

ATTACHMENT A:

ODNR ENVIRONMENTAL REVIEW - 21-0832; FIRSTENERGY - ATSI - BELLEPOINT TAP PROJECT

DATED OCTOBER 8, 2021

Office of Real Estate
John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
Fax: (614) 267-4764

October 8, 2021

Brian Miller
AECOM
Foster Plaza 6
681 Andersen Drive, Suite 120
Pittsburgh, Pennsylvania 15220

Re: 21-0832; FirstEnergy - ATSI - Bellepoint Tap 138kV Project

Project: The proposed project has 2 alternatives including installation of a new structure/switch location located between the existing Structure 5214 and State Route 257 or replacing the existing Structure 5213 to accommodate the new switch located east of Structure 5213.

Location: The proposed project is located in Concord Township, Delaware 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: The Natural Heritage Database has the following records at or within a one-mile radius of the project area:

Arbor vitae (*Thuja occidentalis*), P
Elktoe (*Alasmidonta marginata*), SC
Wavy-rayed lampmussel (*Lampsilis fasciola*), SC
Round pigtoe (*Pleurobema sintoxia*), SC
Kidneyshell (*Ptychobranchus fasciolaris*), SC
Sinkhole
O'Shaughnessy Reservoir Park – Columbus Recreation & Parks

The review was performed on the project area specified in the request as well as an additional one mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

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. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federal endangered, and FT = federal threatened.

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 threatened 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 the leaves. 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 cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH $\geq$ 20 if possible. If trees are present within the project area, and trees must be cut 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 cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "*OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING*". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

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

This project is within the range of the following listed mussel species.
Federally Endangered
rayed bean (*Villosa fabalis*)
snuffbox (*Epioblasma triquetra*)

Federally Threatened
rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Threatened
black sandshell (*Ligumia recta*)
pondhorn (*Uniomerus tetralasmus*)
Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact aquatic species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black-crowned night-heron *(Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

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

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

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

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

Mike Pettegrew
Environmental Services Administrator (Acting)

ATTACHMENT B:

USFWS TECHNICAL ASSISTANCE (03E15000-2021-TA-2341); FIRSTENERGY - ATSI - BELLEPOINT TAP PROJECT

DATED OCTOBER 8, 2021

Miller, Brian

From: Ohio, FW3 <ohio@fws.gov>
Sent: Thursday, September 16, 2021 1:00 PM
To: Miller, Brian
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate
Subject: [EXTERNAL] ATSI Bellepoint Tap 138kV Project, Delaware County Ohio

Follow Up Flag: Follow up
Flag Status: Flagged

UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994

TAILS# 03E15000-2021-TA-2341

Dear Mr. Miller,

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

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

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, we recommend removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see http://www.fws.gov/midwest/endangered/mammals/nleb/index.html), incidental take of Indiana bats is still

prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present. If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

The endangered **rayed bean mussel** (Villosa fabalis) occurs in Mill Creek. The rayed bean is generally known from smaller, headwater creeks, but records exist in larger rivers. They are usually found in or near shoal or riffle areas, and in the shallow, wave-washed areas of lakes. Substrates typically include gravel and sand, and they are often associated with, and buried under the roots of, vegetation, including water willow (Justicia americana) and water milfoil (Myriophyllum sp.). Should the proposed project directly or indirectly impact any of the habitat types described above, we recommend that a survey be conducted to determine the presence or probable absence of rayed bean mussels in the vicinity of the proposed site. Any survey should be designed and conducted in coordination with the Ohio Field Office. Surveyors must have valid Federal and State permits to survey for federally listed mussels in Ohio.

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

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

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

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

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,

Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW

ATTACHMENT C:

REPRESENTATIVE PHOTOGRAPHS OF HABITAT WITHIN PROJECT SURVEY AREA

AECOM

PHOTOGRAPHIC RECORD
Bat Report

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:

October 18, 2021

Description:

PH-01

Photo taken on mowed path within shrubland ROW

East

Date:

October 18, 2021

Description:

PH-01

Photo taken on mowed path within shrubland ROW

West

AECOM

PHOTOGRAPHIC RECORD
Bat Report

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:

October 18, 2021

Description:

PH-02

Photo taken on gravel road inside shrubland ROW

South

Date:

October 18, 2021

Description:

PH-02

Photo taken on gravel road inside shrubland ROW

West

AECOM

PHOTOGRAPHIC RECORD
Bat Report

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

PH-03

Photo taken in open field in SW side of project

East

Date:

October 18, 2021

Description:

PH-03

Photo taken in open field in SW side of Project

West

AECOM

PHOTOGRAPHIC RECORD
Bat Report

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

PH-04

Photo taken in open field in center of project

East

Date:

October 18, 2021

Description:

PH-04

Photo taken in open field in center of Project

West

AECOM

PHOTOGRAPHIC RECORD
Bat Report

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

PH-05

Photo taken in shrubland area North of Sub-station

East

Date:

October 18, 2021

Description:

PH-05

Photo taken in shrubland North of Sub-station

West

AECOM

PHOTOGRAPHIC RECORD
Bat Report

Client Name:	Site Location:	Project No.
American Transmission Systems, Inc, a FirstEnergy Company	Bellepoint Tap Project	60663812

Date:
October 18, 2021

Description:

PH-06

Photo taken in maintained lawn west of State Road.

East

Date:

October 18, 2021

Description:

PH-06

Photo taken in maintained lawn west of State Road.

West