AMERICAN TRANSMISSION SYSTEMS, INCORPORATED A FIRSTENERGY COMPANY

CONSTRUCTION NOTICE

CHRYSLER-DOWLING 138 KV TRANSMISSION LINE SWITCH REPLACEMENT PROJECT OPSB CASE NO.: 24-0967-EL-BNR

December 4, 2024

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

CONSTRUCTION NOTICE CHRYSLER-DOWLING 138 kV TRANSMISSION LINE SWITCH REPLACEMENT PROJECT

The following information is being provided in accordance with Chapter 4906-6 of the Ohio

Administrative Code ("Adm.Code") for the application and review of Accelerated Certificate

Applications. Based upon the requirements found in Appendix A to Adm.Code 4906-1-01, this

Project qualifies for submittal to the Ohio Power Siting Board ("OPSB") as a Construction

Notice application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

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

Name of Project: Chrysler-Dowling 138 kV Transmission Line Switch

Replacement ("Project")

Reference Number: 3012-1

4906-6-05 (B)(1): Brief Description of Project and Reference Numbers

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy

company, is proposing to replace two existing air switches currently mounted on the same

existing structure on the Chrysler-Dowling 138 kV Transmission Line. The two existing

switches will be replaced with two (2) new switches on new, separate single-steel monopole

structures on concrete foundations. One new switch and structure (structure #12690A) will

be located approximately 105' north-northeast from existing structure #12690 on the same

centerline. The other new switch and structure will be located at approximately the same

location as existing structure #113, replacing existing structure #113 on the same centerline.

The conductor and shield wire will be transferred to new structures.

The general location of the proposed Project is shown in Exhibits 1 and 2. Exhibit 1 is a

partial copy of a United States Geologic Survey ("USGS") Topographic Map, Wood

County, Ohio Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery. The

general layout is shown in Exhibit 3. The Project is in Perrysburg Township, Wood County, Ohio.

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

The Project meets the requirements for a Construction Notice application 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 Adm. Code 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 replacing structures with a different type of structure for a distance of less than 2 miles.

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

The existing Chrysler-Dowling 138 kV Transmission Line switches A-13137 and A-13118 are of a design that is obsolete, no longer meets present standards, and are no longer supported for repair parts by the manufacturer. Although mounted to a laminate pole, deflection over time has subjected the phase-over-phase design of these switches to torsional and deflection stresses, resulting in diminished reliability. The last cyclic maintenance occurred in 2020, however the viability of continued maintenance is questionable. Coupled with the combination of unavailability of parts, operational history, and continued changes in structural integrity, attempts to prolong service would be temporary in nature or unsuccessful. The proposed solution is to relocate and replace

both switches and motor operators to new, mid-span structures, using an improved unitized design meeting present engineering standards.

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. 2024 Long-Term Forecast Report. This map was submitted to the PUCO in Case No. 24-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. The Project is not included in ATSI's LTFR filed in 2024 because the Project does not entail any topology or rating change. The general location and layout of the Project area is shown in Exhibits 1 and 2.

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

Two alternatives were considered as part of this Project. The first alternative considered was to continue to maintain and repair the existing switches. This was not chosen because the manufacturer no longer supports repair parts for the switches, thus requiring any replacement parts for repair to be fabricated. This leads to long lead time and vulnerability to failure. The second alternative considered was to remove the switches from the transmission line. This alternative was not chosen because removing the switches entirely would result in an unacceptable sectionalizing scheme.

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

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

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

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

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

The construction schedule for this Project is expected to begin as early as March 31, 2025, and to be completed by June 1, 2025.

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

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

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

The Project is located entirely within existing right-of-way on parcels P57-400-020000014001 and P57-400-020000017000. No new Easements will be required for completion of this Project.

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

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

The equipment and facilities described below are associated with the Project.

Voltage: 138 kV

Conductors: 954 kemil 37 Strand AAC

Static Wire: 7#10 Alumoweld

Insulators: Porcelain

ROW Width: 65 feet (no new ROW required)

Structure Types: Exhibit 4 – Steel Pole Deadend Switch Structure on concrete

foundation

(Two (2) Structures needed).

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

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

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

The estimated cost for the proposed Project is \$544,700. Although not statutorily required for approval, at the request of OPSB Staff, ATSI confirms that ATSI's costs will be captured and allocated via FERC formula rates for the ATSI Transmission Zone, Attachment H-21 in the PJM OATT.

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

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

The Project is in Perrysburg Township, Wood County, Ohio. The Project area is in commercial/agricultural zoned land. No significant changes or impacts to the current or future land use are anticipated.

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

Agricultural land (primarily cultivated cropland) exists within the Project's Area of Potential Effect ("APE"). Parcel No. P57-400-020000017000) is enrolled as an Agricultural District. This designation expires in 2029.

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

As part of the investigation for this Construction Notice, TRC Companies, Inc. ('TRC') submitted a request to the Ohio Historic Preservation Office ("SHPO") on behalf of ATSI to review and provide comments on July 22, 2024, for the Project Study Area (Area of Potential Effects or APE) with a one (1)-mile search radius. On August 23, 2024, SHPO replied to the request and the response is attached as Exhibit 5. SHPO concurred that the Project, as proposed, will not affect any historic properties or cultural resources. No

further coordination is required unless the scope of work changes or new/additional archaeological deposits are discovered during construction.

The SHPO database also includes the Ohio Historic Inventory ("OHI"), the Ohio Archaeological Inventory ("OAI"), previous cultural resource surveys, and the Ohio Genealogical Society ("OGS") cemetery inventory. The SHPO 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. No OGS cemeteries have been inventoried within one mile of the Project's APE. One OAI pre-contact site was identified approximately 0.7 miles west of the Project's APE. One OHI historic resource was identified approximately 0.8 miles north of the Project's APE. No impacts to any culturally significant resources are expected. No listed NRHP sites and no NRHP eligible sites were identified within one mile of the Project's APE. One above-ground resource that has not yet been evaluated for NHRP eligibility is located approximately 0.8 miles away from the Project's APE.

The Project will not impact the viewshed of any potential historic properties. Additionally, due to prior anthropogenic disturbances, the Project has a low potential to encounter intact, significant archaeological resources. The Project will have no adverse effect upon any cultural or archaeological resources.

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

No additional government agency authorizations or permits are required for this Project.

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

As part of the investigation, ATSI retained TRC to conduct necessary surveys. TRC submitted a request to the Ohio Department of Natural Resources ("ODNR") Office of Real Estate to conduct an Environmental Review. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife's

Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project Study Area. The ODNR's Office of Real Estate's response on July 23, 2024, stated that there are no records of state or federally listed plants and animals within one mile of the specified Project area. A copy of ODNR's Office of Real Estate's response is included as Exhibit 6.

A list of all endangered, threatened, and rare species, as identified by ODNR and USFWS, is provided in Table 1.

Table 1. List of Endangered, Threatened, and Rare Species

| Common Name | Scientific Name | Federal Listed Status | State Listed Status | Preferred Habitat | Suitable Habitat Present within Study Area |
|--------------------------------|-----------------------------------|-----------------------------|------------------------|-------------------------|--|
| Indiana Bat | Myotis sodalis | Endangered | Endangered | Trees & Forest | No |
| Northern Long-Eared Bat | Myotis septentrionalis | Endangered | Threatened | Trees & Forest | No |
| Little Brown Bat | Myotis lucifugus | NA | Endangered | Trees & Forest | No |
| Tricolored Bat | Perimyotis subflavus | Proposed Endangered | Endangered | Trees & Forest | No |
| Pondhorn | Uniomerus tetralasmus | NA | Threatened | Perennial Streams | No |
| Western Banded Killifish | Fundulus diaphananus menona | NA | Endangered | Ponds, rivers and lakes | No |
| Greater Redhorse | Moxostoma valenciennesi | NA | Threatened | Perennial Streams | No |

As part of the investigation, TRC also submitted a request to the US Fish and Wildlife Service ("USFWS") for an Ecological Review to research the presence of any endangered, threatened, rare, or designated species within one (1) mile of the Project Area. A copy of USFWS's Ecological Review response, dated June 16, 2024, is included as Exhibit 7. The response states that due to the Project, type, size, and location, no adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat are anticipated.

The response also indicated that the Project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species; the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species; the little brown bat (*Myotis lucifugus*), a state endangered species; and the tricolored bat (*Perimyotis subflavus*), a state endangered species. Currently as proposed, no tree clearing is anticipated within the Project Study Area; therefore, the Project will not impact these bat species.

At the request of the DOW, TRC conducted a desktop habitat assessment to determine if there are potential hibernaculum(a) present within 0.25-mile the Project area. TRC followed the current USFWS "Range-wide Indiana Bat Survey Guidelines" when conducting this assessment and utilized data obtained from the ODNR Mines of Ohio Viewer, ODNR geologic maps, topographic maps, and aerial photographs. During the field survey of the Project, no evidence of potential hibernacula consisting of caves, rock outcrops, mines, cliffs, or karst features were observed. In addition to the field survey, coordination with ODNR did not identify any known bat hibernacula within a one-mile radius of the Project. Based on the desktop habitat review and the results of the field survey, it does not appear likely that potential hibernacula exist within 0.25-mile of the Project area. Results of the desktop assessment was sent to ONDR for concurrence on August 19, 2024. Their concurrence can be found in Exhibit 6A.

The ODNR-DOW also identified the Project is within the range of the pondhorn (*Uniomerus tetralasmus*; State Threatened), western banded killifish (*Fundulus diaphananus menona*; State Endangered), and the greater redhorse (*Moxostoma valenciennesi*; State Threatened). An on-site field assessment was performed by TRC. Field observations did not identify suitable habitat for these species within the Project area. Therefore, due to the fact that suitable habitat for these listed species is not present within the Project area; this Project will not affect these species.

The Project work limits will be entirely within the maintained transmission line corridor. Additionally, no trees will be cleared as a result of the Project. As such, the Project is not anticipated to adversely impact any state or federally listed species.

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

TRC conducted a wetland and stream delineation for the Project on July 15, 2024, as shown in Exhibit 8. The Project Study Area is approximately 4.089-acres and is located in Perrysburg Township, Wood County, Ohio. No jurisdictional wetlands or streams were identified or delineated within the Project Study Area. Two non-jurisdictional agricultural ditches were identified.

As part of the Environmental Review, the ODNR Office of Real Estate researched the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. No protected sites or public properties were identified.

The new switch structures and foundations will be placed along developed ROW associated with the Chrysler-Dowling 138 kV Transmission Line. Notification to the U.S. Army Corps of Engineers (USACE) is not required as no impacts to any Waters of the United States are proposed. Reasonable best management practices will be used to ensure debris or sediment does not leave the project site that could potentially impact nearby waterways.

The Project work limits do not include any in-stream activities or encroach on any regulated flood plains based on a review of online FEMA Flood Insurance Rate Mapping.

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 Application Transmittal and Availability for Public Review

This Construction Notice application is being provided concurrently to the following public officials from Perrysburg Township and Wood County.

Wood County

Mr. Craig LaHote
Wood County Commissioner
5th Floor, County Office Building
One Courthouse Square
Bowling Green, OH 43402
commissioners@woodcountyohio.gov

Dr. Theodore H. Bowlus
Wood County Commissioner
5th Floor, County Office Building
One Courthouse Square
Bowling Green, OH 43402
commissioners@woodcountyohio.gov

Ms. Doris I. Herringshaw, Ed.D. Wood County Commissioner 5th Floor, County Office Building One Courthouse Square Bowling Green, OH 43402 *commissioners@woodcountyohio.gov*

Mr. John M. Musteric P.E, P.S., Wood County Engineer County Office Building One Courthouse Square Bowling Green, OH 43402 engineer@woodcountyohio.gov

Mr. Dave Steiner, Director
Wood County
Planning Commission
5th Floor, County Office Building
One Courthouse Square
Bowling Green, OH 43402
PlanComm@woodcountyohio.gov

Mr. Jim Carter,
District Administrator,
Wood County Soil & Water
Conservation District
1616 E. Wooster St. Suite 32
Bowling Green, OH 43402
wcswcd@woodswcd.com

Perrysburg Township

Mr. Gary Britten, Trustee
Perrysburg Township
10960 Rochton Road,
Perrysburg, OH 43551
Brittencattlesource@hotmail.com

Mr. Robert Mack, Trustee Perrysburg Township 30195 Morningside Drive Perrysburg, OH 43551 RPMack@buckeye-express.com Mr. Joseph Schaller, Trustee Perrysburg Township 27840 Glenwood Perrysburg, OH 43551 jschaller@perrysburgtownship.us

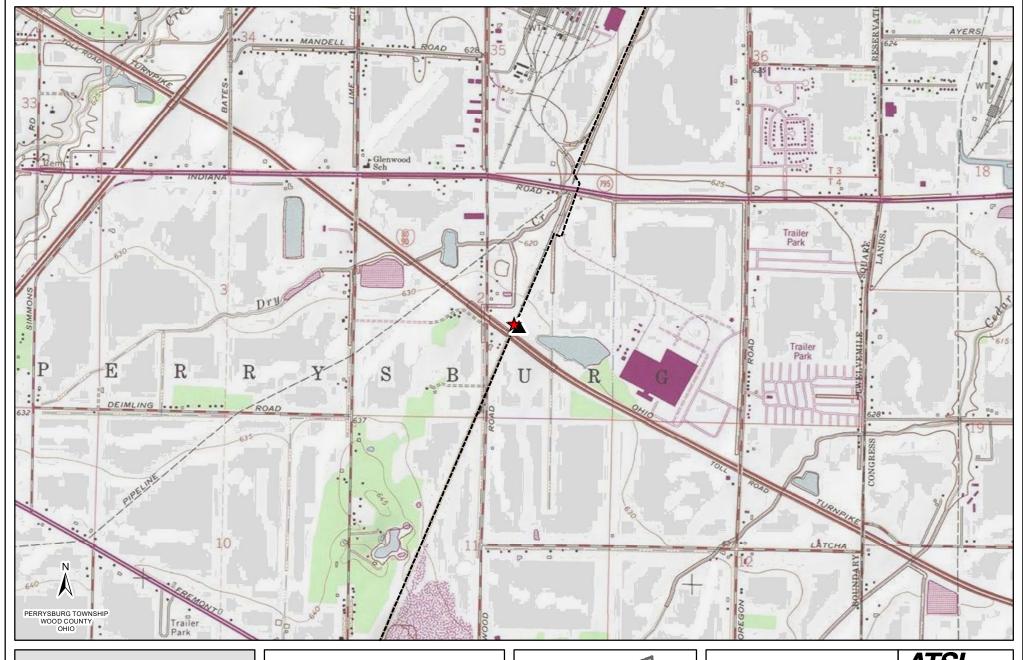
Mr. Jon Eckel, Township Administrator 26609 Lime City Road Perrysburg, OH 43551 jeckel@perrysburgtownship.us

Library

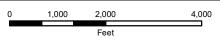
Ms. Janel Haas, Director Way Public Library 101 E Indiana Avenue, Perrysburg, OH 43551 janel.haas@waylibrary.info

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

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







Reference: USGS Topographical Overlay

Coordinate System:

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



EXHIBIT 1

American Transmission Systems, Inc.

Chrysler-Dowling 138 kV Transmission Line Switch Replacement Project



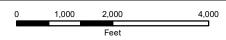






--- Roads

- - 138 kV Transmission Line



Reference: ESRI Imagery; ODOT

Coordinate System:

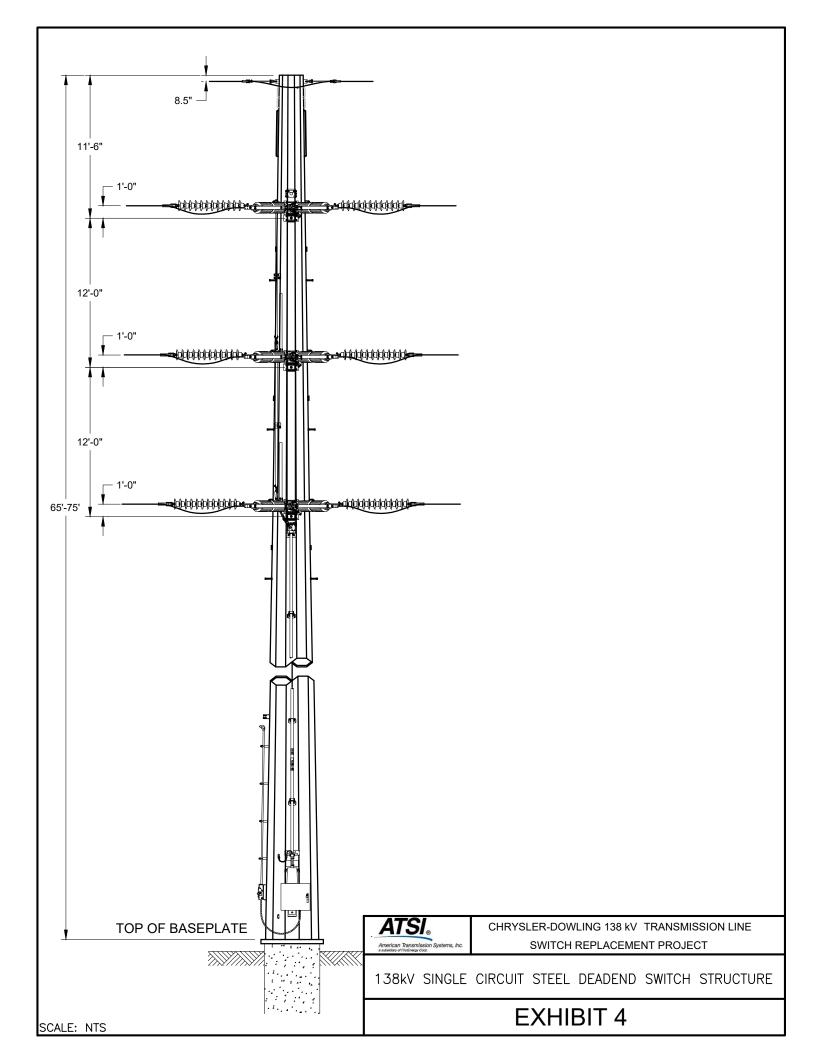
NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US



EXHIBIT 2



Chrysler-Dowling 138 kV Transmission Line Switch Replacement Project





In reply refer to: 2024-WOO-61940

August 23, 2024

Justin McKissick, MA, RPA Project Archaeologist/Field Director TRC Environmental Corporation 317 E Carson Street, Suite 113 Pittsburgh, PA 15219

Email: JMcKissick@trccompanies.com

RE: Section 106 Review: Chrysler-Dowling 138 kV Switch Replacement Project, Perrysburg Township, Wood County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on July 26, 2024, regarding the above reference project in Wood County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code (O.R.C.) and the Ohio Power Siting Board rules for siting this project. The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The proposed project involves the replacement of switches A-13137 and A-13118 on Structure 12690 along the Chrysler-Dowling 138kV transmission line. Based on information submitted by you, which included a Project Summary Form, no historic properties, districts, or archaeological sites are located within the direct Area of Potential Effect (APE), as defined by you. However, several resources fifty years of age or older were identified within the proposed indirect APE. The new infrastructure will not exceed the existing infrastructure heights, and no new visual impacts are anticipated. Therefore, it is our opinion that there will be no effect on historic resources as a result of the project. No cultural resource studies are warranted for the project. No further coordination is required for this project unless the scope of work changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted. If you have any questions concerning this review, please contact either myself via email at sbiehl@ohiohistory.org or Ms. Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Stephen M. Biehl, Project Reviews Manager (archaeology)

Resource Protection and Review State Historic Preservation Office

Stephen M. Biell

RPR Serial No. 1104169



OHIO HISTORIC PRESERVATION OFFICE: RESOURCE PROTECTION AND REVIEW

Section 106 Review - Project Summary Form

For projects requiring a license from the Federal Communications Commission, please use FCC Forms 620 or 621. DO NOT USE THIS FORM.

SECTION 1: GENERAL PROJECT INFORMATION

All contact information provided must include the name, address and phone number of the person listed. Email addresses should also be included, if available. Please refer to the Instructions or contact an OHPO reviewer (mailto:Section106@ohiohistory.org) if you need help completing this Form. Unless otherwise requested, we will contact the person submitting this Form with questions or comments about this project.

Date: 07/22/2024

Name/Affiliation of person submitting form: Justin McKissick, MA, RPA

Mailing Address: 317 E. Carson Street, Suite 113, Pittsburgh, PA 15219

Phone/Fax/Email: 412.660.7937/jmckissick@trccompanies.com

A. Project Info:

1. This Form provides information about:

New Project Submittal:

YES

Additional information relating to previously submitted project:

NO

OHPO/RPR Serial Number from previous submission:

- 2. Project Name (if applicable): **Chrysler-Dowling 138 kV Switch Replacement Project**
- 3. Internal tracking or reference number used by Federal Agency, consultant, and/or applicant to identify this project (if applicable): **429847.0022.0043**

- B. Project Address or vicinity: The Study Area is situated west of Glenwood Road with a northern terminus (41.557336, -83.555061) approximately 0.12 miles (mi) east of the road and extends for 0.33 mi south-southwest within an existing overhead utility corridor (41.552975, -83.557514) (Figure 1).
- C. City/Township: Perrysburg Township
- D. County: Wood County
- E. Federal Agency and Agency Contact. If you do not know the federal agency involved in your project, please contact the party asking you to apply for Section 106 Review, not OHPO, for this information. HUD Entitlement Communities acting under delegated environmental review authority should list their own contact information. N/A
- F. Type of Federal Assistance. List all known federal sources of federal funding, approvals, and permits to avoid repeated reviews. **N/A**
- G. State Agency and Contact Person (if applicable): **Ohio Power Siting Board** (**OPSB**)
- H. Type of State Assistance: N/A
- I. Is this project being submitted at the direction of a state agency **solely** under Ohio Revised Code 149.53 or at the direction of a State Agency? *Answering yes to this question means that you are sure that <u>no</u> federal funding, permits or approvals will be used for any part of your project, and that you are seeking comments only under ORC 149.53.*

NO

- J. Public Involvement- Describe how the public has been/will be informed about this project and its potential to affect historic properties. Please summarize how they will have an opportunity to provide comments about any effects to historic properties. (This step is required for all projects under 36 CFR § 800.2):
- K. Please list other consulting parties that you have contacted/will contact about this project, such as Indian Tribes, Certified Local Governments, local officials, property owners, or preservation groups. (See 36 CFR § 800.2 for more information about involving other consulting parties). Please summarize how they will have an opportunity to provide comments:

SECTION 2: PROJECT DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

Provide a description of your project, its site, and geographical information. You will also describe your project's Area of Potential Effects (APE). Please refer to the Instructions or contact an OHPO reviewer if you need help with developing the APE or completing this form.

For challenging projects, provide as much information as possible in all sections, and then check the box in Section 5.A. to ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties or if there may be challenging procedural issues related to your project. Please note that providing information to complete all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

- A. Does this project involve any Ground-Disturbing activity: **YES** (If **Yes**, you must complete all of Section 2.A. If **No**, proceed directly to Section 2. B.)
 - 1. General description of width, length and depth of proposed ground disturbing activity:

The proposed Study Area measures approximately 4.09 acres (ac) in size, approximately 0.33 mi long (northeast to southwest) and approximately 90 ft wide (east-west) at its widest extents with an access road extending 0.12 mi from the northern terminus to Glenwood Road (Figure 2). The Study Area also includes an area surrounding an existing substation that measures approximately 280 ft long (E-W) and 240 ft wide (N-S). The Limits of Disturbance (LOD), which corresponds to the Area of Potential Effects (APE) will be completely within the Study Area.

- 2. Narrative description of previous land use and past ground disturbances, if known: Historically, the landscape was likely agricultural fields or wooded landscapes until the nineteenth century as the region became settled. By the mid-nineteenth century, project area was part of three (3) residential properties. Between 1875 and 1886, the extent railroad line was constructed through the area and the Study Area was situated on two (2) parcels.
 - 3. Narrative description of current land use and conditions:

The modern aerial imagery shows the Study Area within an existing, maintained utility right-of-way comprised of grass areas, overgrown areas, and agricultural fields on residential properties (Figure 2). Overview photographs are provided as Attachment 1.

- 4. Does the landowner know of any archaeological resources found on the property? YES NO If yes, please describe: **Unknown**
- B. Submit the exact project site location on a USGS 7.5-minute topographic quadrangle map for all projects. Map sections, photocopies of map sections, and online versions of USGS maps are acceptable as long as the location is clearly marked. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:
 - 1. USGS Quad Map Name: Rossford, OH
 - 2. Township/City/Village Name: Perrysburg Township, Wood County
- C. Provide a street-level map indicating the location of the project site; road names must be identified and legible. Your map must show the exact location of the boundaries for the project site. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map: **See Figure 2**
- D. Provide a verbal description of the APE, including a discussion of how the APE will include areas with the potential for direct and indirect effects from the project. Explain the steps taken to identify the project's APE, and your justification for the specific boundaries chosen: The direct APE will include all areas in which construction activities associated with the proposed Project, which involves the replacement of switches A-13137 and A-13118 on Structure 12690, on the existing Chrysler-Dowling 138kV transmission line. The indirect APE will be within a viewshed that will be based on LIDAR data, vegetation, topography, and buildings, which will reduce the indirect APE to areas with positive visibility of the Project infrastructure. While there are several buildings in the area over 50 years of age, the new infrastructure will not exceed the current

infrastructure heights and no new visual impacts are anticipated.

E. Provide a detailed description of the project. This is a critical part of your submission. Your description should be prepared for a cold reader who may not be an expert in this type of project. The information provided must help support your analysis of effects to historic properties, not other types of project impacts. Do not simply include copies of environmental documents or other types of specialized project reports. If there are multiple project alternatives, you should include information about all alternatives that are still under active consideration:

This Project involves the involves the replacement of switches A-13137 and A-13118 on Structure 12690, on the existing Chrysler-Dowling 138kV transmission line, utilizing the existing maintained access roads. The Study Area for the proposed project measures approximately 4.09 ac in size (Figure 2).

SECTION 3: IDENTIFICATION OF HISTORIC PROPERTIES

Describe whether there are historic properties located within your project APE. To make that determination, use information generated from your own Background Research and Field Survey. Then choose one of the following options to report your findings. Please refer to the Instructions and/or contact an OHPO reviewer if you are unsure about how to identify historic properties for your project.

The file review revealed no NRHP-listed or -eligible historic properties recorded within one (1)-mi of the proposed Project. There is one (1) above-ground historic resource that has not yet been evaluated for NRHP eligibility recorded 0.82 mi north of the Study Area. There are no Ohio Genealogical Society (OGS) Cemeteries recorded within one (1)-mi of the proposed Project.

There have been three (3) formal archaeological surveys conducted within one (1)-mi of the proposed Project. None of the surveys overlap the Study Area with the nearest situated 0.72 mi to the southwest. There has been one (1) pre-contact open site of unknown temporal affiliation recorded 0.74 mi west of the proposed Project.

A review of available historic maps was conducted to determine the presence of historic structures (50 years of age or older) and other possible historic features within or adjacent to the Study Area that may be impacted by the proposed Project. By 1875, the region had been settled with residential buildings denoted primarily along the established transportation routes (Attachment 2, Image 1), Glenwood Road had been established and the Study Area is situated on three (3) parcels attributed to H. Holt, H.E. Peck, and Jos. Perkins. Buildings are situated adjacent to the Study Area on the H. Holt and H.E. Peck parcels. Perrysburg, to the west, was the most-populated town in the vicinity of the proposed Project. In 1886, the C&S Railroad line had been constructed along the Study Area, which is situated on parcels attributed to Henry Hold and Jos. Perkins (Attachment 2, Image 2). Overall, the region remained rural with a small number of new residential buildings denoted along the existing roadways. Through the turn of the century, the overall region remained rural (Attachment 2, Image 3). The town of Lime City appears to have grown slightly, likely due to the presence of the railroad line at the intersection with the roadway that would become the Ohio Turnpike. Two (2) buildings are mapped west and northwest of the Study Area. The 1965 USGS map shows a similar landscape, with buildings mapped along the established transportation routes (Attachment 2, Image 4). The regional population appears to have increased moderately as only a few new buildings are denoted. A large railroad distribution yard was constructed north of the proposed Project. Overall, the majority of development appears to have occurred in the existing towns of Perrysburg and Lime City. Modern aerial photography shows an existing, maintained utility right-of-way comprised of grass areas, overgrown areas, and agricultural fields on residential properties.

If you read the Instructions and you're still confused as to which reporting option best fits your project, or you are not sure if your project needs a survey, you may choose to skip this section, but provide as much supporting documentation as possible in all other Sections, then check the box in Section 5.A. to request preliminary comments from OHPO. After reviewing the information provided, OHPO will then offer comments as to which reporting option is best suited to document historic properties for your project. Please note that providing information to complete this Section will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

Recording the Results of Background Research and Field Survey:

- A. **Summary of discussions and/or consultation with OHPO** about this project that demonstrates how the Agency Official and OHPO have agreed that no Field Survey was necessary for this project (typically due to extreme ground disturbance or other special circumstances). Please <u>attach copies</u> of emails/correspondence that document this agreement. You must explain how the project's potential to affect both archaeological and historic resources were considered. **N/A**
- B. A table that includes the minimum information listed in the OHPO Section 106
 Documentation Table (which is generally equivalent to the information found on an
 inventory form). This information must be printed and mailed with the Project Summary
 Form. To provide sufficient information to complete this Section, you must also include
 summary observations from your field survey, background research and eligibility
 determinations for each property that was evaluated in the project APE. **N/A**
- C. OHI (Ohio Historic Inventory) or OAI (Ohio Archaeological Inventory) forms- New or updated inventory forms may be prepared using the OHI pdf form with data population capabilities, the Internet IForm, or typed on archival quality inventory forms. To provide sufficient information to complete this Section, you must include summary observations from your field survey and background research. You must also include eligibility determinations for each property that was evaluated in the project APE. N/A
- D. A historic or archaeological survey report prepared by a qualified consultant that meets professional standards. The survey report should meet the Secretary of the Interior's Standards and Guidelines for Identification and OHPO Archaeological Guidelines. You may also include new inventory forms with your survey or update previous inventory forms. To complete this section, your survey report must include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated within the APE. **N/A**
- E. **Project Findings**. Based on the conclusions you reached in completing Section 3, please choose one finding for your project. There are (mark one):

 Historic Properties Present in the APE:

No Historic Properties Present in the APE:

SECTION 4: SUPPORTING DOCUMENTATION

This information must be provided for all projects.

A. Photographs must be keyed to a street-level map and should be included as attachments to this application. Please label all forms, tables and CDs with the date of your submission and project name, as identified in Section 1. You must present enough documentation to clearly show existing conditions at your project site and convey details about the buildings, structures or sites that are described in your submission. Faxed or photocopied photographs are not acceptable. See

Instructions for more info about photo submissions or 36 CFR § 800.11 for federal documentation standards.

- Provide photos of the entire project site and take photos to/from historic properties from/towards your project site to support your determination of effect in Section 5. See Attachment 1 - Photographs
- 2. Provide current photos of all buildings/structures/sites described.
- B. Project plan, specifications, site drawings and any other media presentation that conveys detailed information about your project and its potential to affect historic properties.
- C. Copies or summaries of any comments provided by consulting parties or the public.

SECTION 5: DETERMINATION OF EFFECT

- A. Request Preliminary Comments. For challenging projects, provide as much information as possible in previous sections and ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties, if the public has concerns about your project's potential to affect historic properties, or if there may be challenging procedural issues related to your project. Please be aware that providing information in all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.
 - 1. We request preliminary comments from OHPO about this project:
 - 2. Please specify as clearly as possible the particular issues that you would like OHPO to examine for your project (for example- help with developing an APE, addressing the concerns of consulting parties, survey methodology, etc.):

Please review the provided information and respond with your determination relative to the potential effects to cultural resources, if any.

- B. **Determination of Effect.** If you believe that you have gathered enough information to conclude the Section 106 process, you may be ready to make a determination of effect and ask OHPO for concurrence, while considering public comments. Please select and mark one of the following determinations, then explain the basis for your decision on an attached sheet of paper:
 - **No historic properties will be affected** based on 36 CFR § 800.4(d) (1). Please explain how you made this determination:
 - **No Adverse Effect** [36 CFR § 800.5(b)] on historic properties. This finding cannot be used if there are no historic properties present in your project APE. Please explain why the Criteria of Adverse Effect, [36 CFR Part 800.5(a) (1)], were found not to be applicable for your project:
 - Adverse Effect [36 CFR § 800.5(d) (2)] on historic properties. Please explain why the criteria of adverse effect, [36 CFR Part 800.5(a) (1)], were found to be applicable to your project. You may also include an explanation of how these adverse effects might be avoided, reduced or mitigated:

Please send completed form and supporting documentation to our office through the section106@ohiohistory.org e-mail address. Note that file size is limited to 30 MB. The Ohio SHPO has a federally mandated review time of 30 calendar day. To check your submission was received and logged in for our review, please visit https://www.ohiohistory.org/preserve/state-historic-preservation-office/hpreviews/section-106-project-status.

REFERENCES

Durant, S.W., P.A. Durant, R.P. Hinkley, D.P. Kayner, F.N. Wheeler, and George Rossiter

"Map of Perrysburg Township" in An Illustrated Atlas of Lucas and Part of
Wood Counties, Ohio. Published by Andreas and Baskin, Chicago, Illinois.

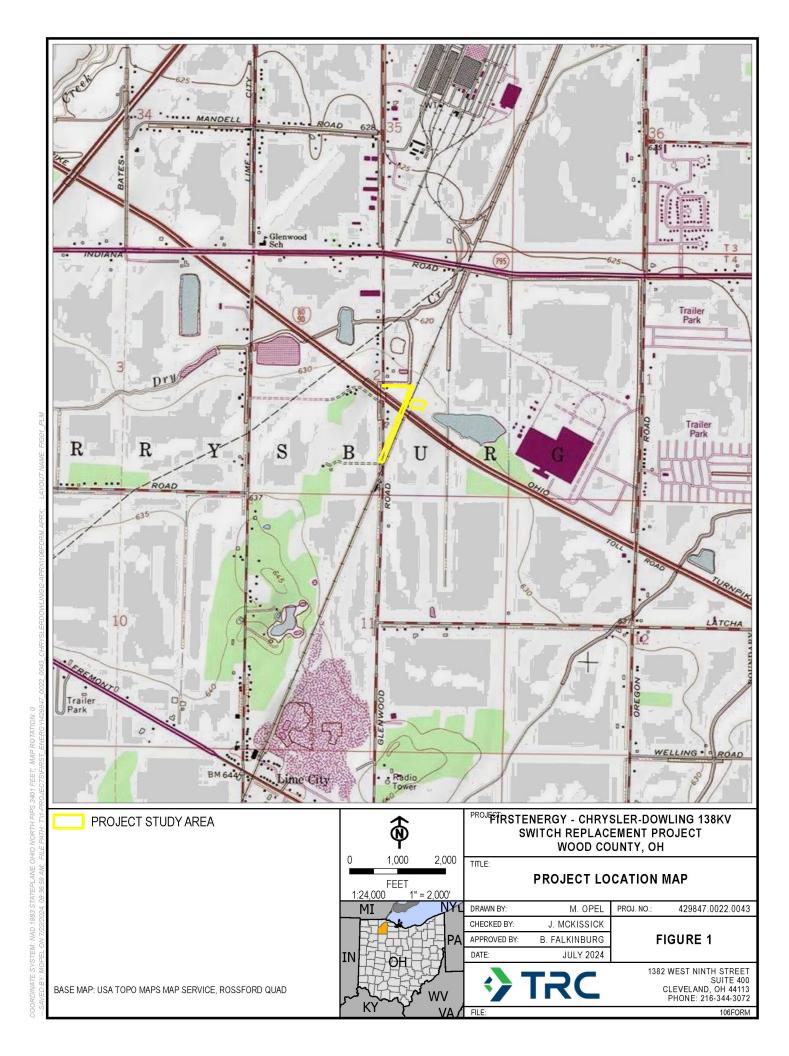
Electronic document, https://ohiomemory.org/digital/collection/p16007coll33/id/88946/, accessed July 22, 2024.

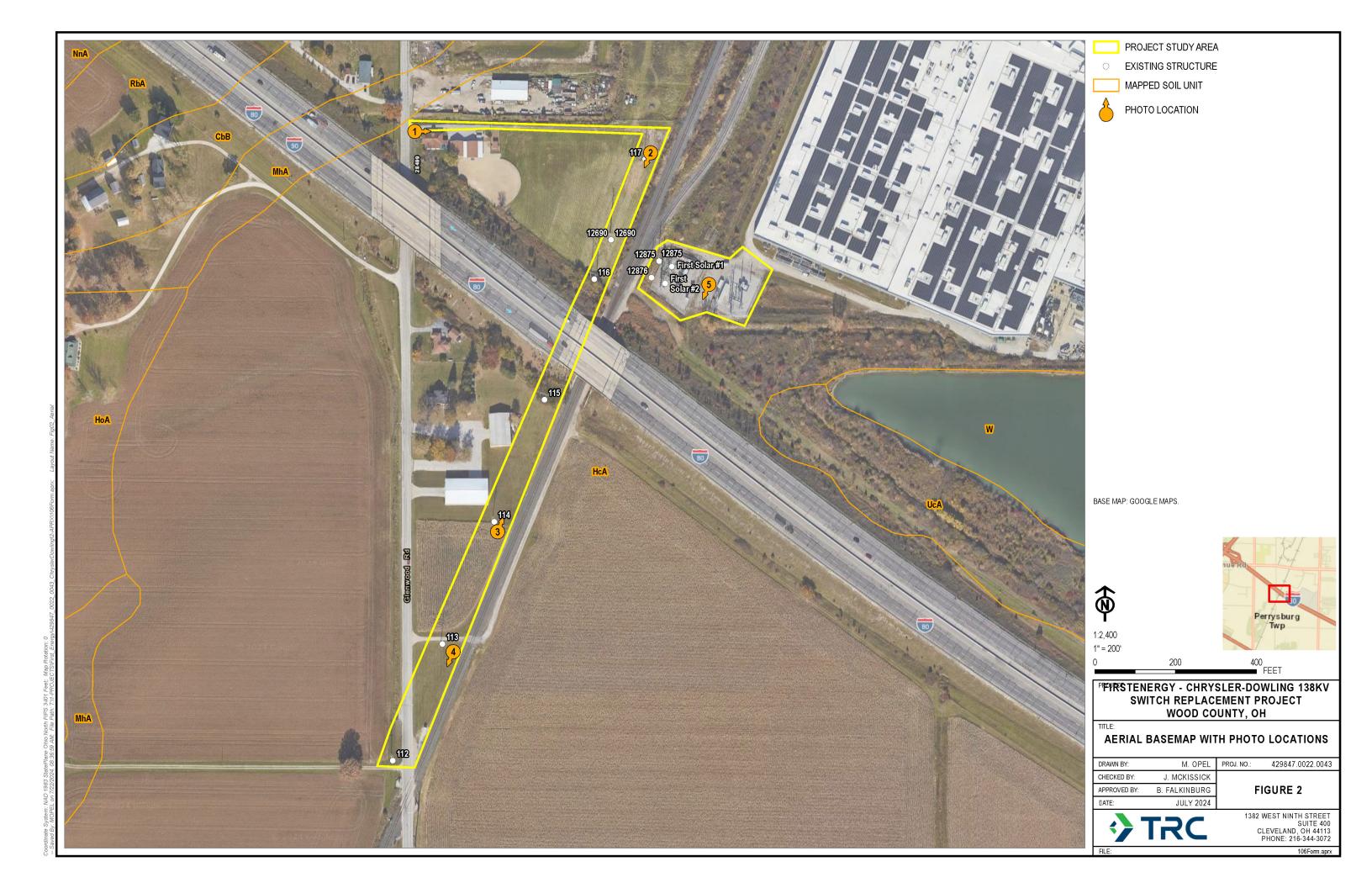
Griffing, B.N., C.E.

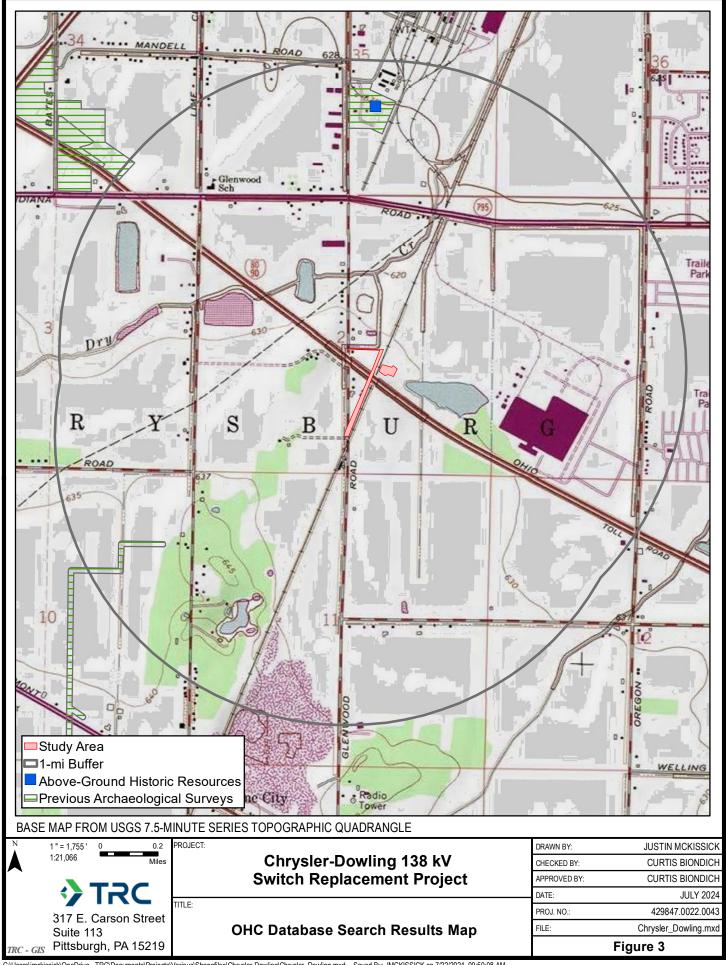
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- 1886b "Perrysburg" in An Atlas of Wood County, Ohio. Published by Griffing, Gordon, & Co., Philadelphia, Pennsylvania. Electronic document, https://historicmapworks.com/Map/US/174901/Perrysburg+Township++Dowling+P+O++++Below/Wood+County+1886/Ohio/, accessed July 22, 2024.

United States Geographical Survey

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- 1965 Rossford, OH 7.5-minute series topographic series. Electronic document, https://ngmdb.usgs.gov/topoview/viewer/#14/41.5446/-83.5718, accessed July 22, 2024.









ATTACHMENT 1

Photographs



PHOTOGRAPHIC RECORD

Chrysler-Dowling 138 kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy Corporation

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 1.

Date:

07/25/2024

Description:

Facing east, showing maintained utility right-of-way at the northern extent of the Study Area.



Photo No. 2.

Date:

07/25/2024

Description:

Facing southsouthwest, showing the maintained utility right-of-way at the northern extent of the Study Area.





PHOTOGRAPHIC RECORD

Chrysler-Dowling 138 kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy Corporation

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 3.

Date:

07/25/2024

Description:

Facing northnortheast, showing the maintained utility right-of-way at the southern extent of the Study Area.



Photo No. 4.

Date:

07/25/2024

Description:

Facing southsouthwest, showing the maintained utility right-of-way at the southern extent of the Study Area.





PHOTOGRAPHIC RECORD

Chrysler-Dowling 138 kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy Corporation

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 3.

Date:

07/25/2024

Description:

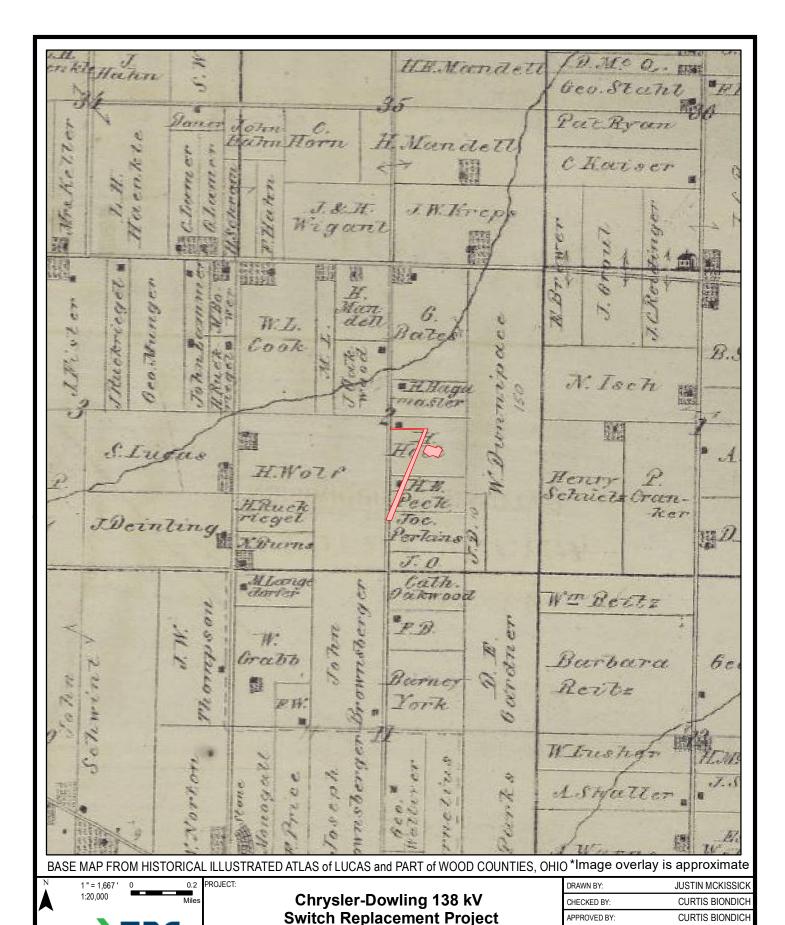
Facing southsouthwest, showing the gravel access drive and area surrounding the existing substation.





ATTACHMENT 2

Historic Map Images



317 E. Carson Street Suite 113
Pittsburgh, PA 15219

Switch Replacement Project

DATE:

DATE:

JULY 2024

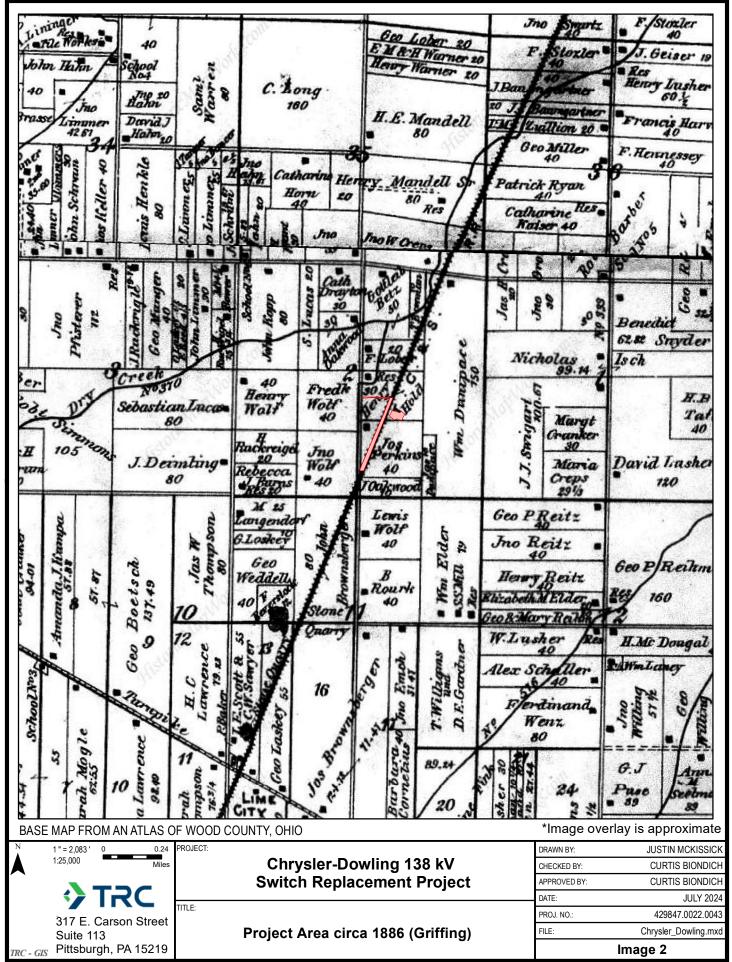
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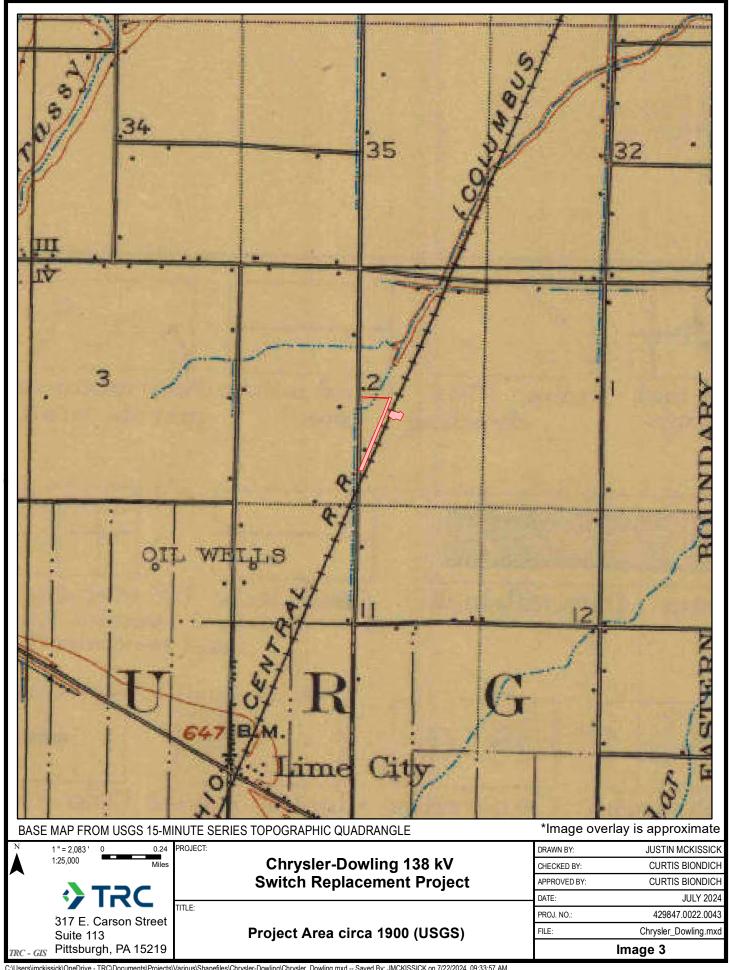
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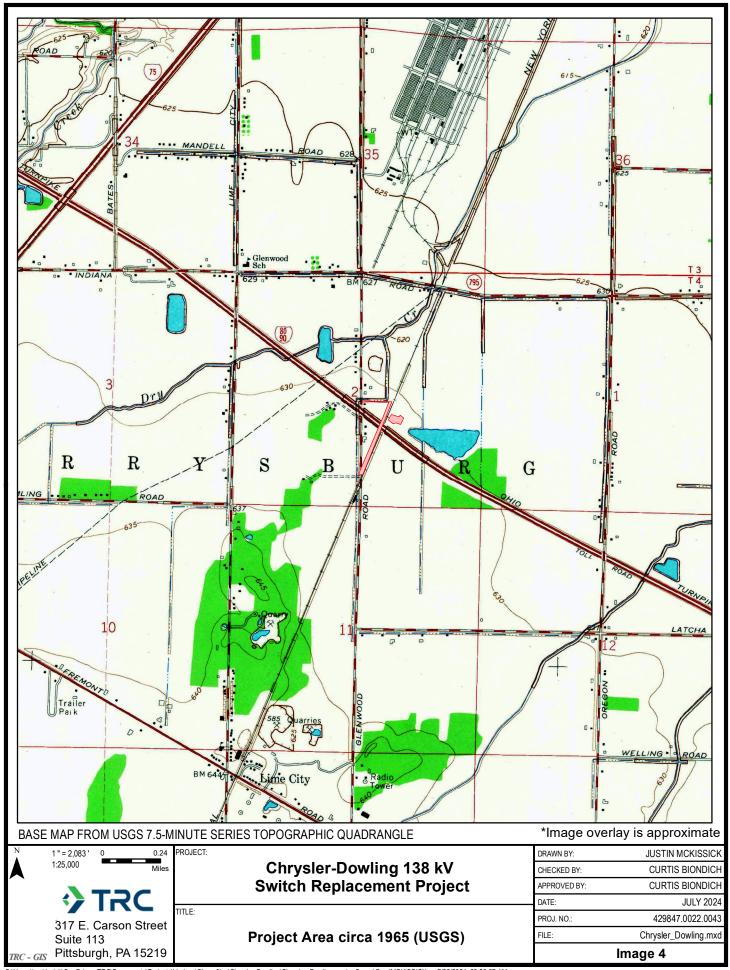
FILE:

Chrysler_Dowling.mxd

Image 1









Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate
Tara Paciorek, Chief
2045 Morse Road – Bldg. E-2
Columbus, Ohio 43229
Phone: (614) 265-6661

Fax: (614) 267-4764

July 23, 2024

Emma Given TRC Companies, Inc. 1382 West 9th Street, Suite 400 Cleveland, Ohio 44113

Re: 24-0934_Chrysler-Dowling 138kV Switch Replacement

Project: The proposed project involves the replacement of switches A-13137 and A-13118 on Structure 12690, on the existing Chrysler-Dowling 138kV transmission line.

Location: The proposed project is located in Perrysburg Township, Wood County, Ohio.

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

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

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

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

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

The entire state of Ohio is within the range of the Indiana bat (Myotis sodalis), a state endangered and federally endangered species, the northern long-eared bat (Myotis septentrionalis), a state endangered and federally endangered species, the little brown bat (Myotis lucifugus), a state endangered species, and the tricolored bat (Perimyotis subflavus), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in 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 ≥ 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 Eileen Wyza at Eileen. Wyza@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 & NORTHERN LONG-EARED BAT SURVEY GUIDELINES." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the pondhorn (Uniomerus tetralasmus), a state threatened mussel. 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 this species.

The project is within the range of the western banded killifish (Fundulus diaphananus menona), a state endangered fish, and the greater redhorse (Moxostoma valenciennesi), a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

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.

Thank you for affording us the opportunity to comment.

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

The <u>local floodplain administrator</u> should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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



August 19, 2024

Ohio Department of Natural Resources Office of Real Estate & Land Management 2045 Morse Road, Building E-2 Columbus, OH 43229-6693

Re: Desktop Assessment for potential hibernaculum for the Chrysler-Dowling 138kV Switch Replacement Project located in Perrysburg Township, Wood County, Ohio.

(TRC Project No. 429847.0022.0043)

To Whom It May Concern,

In response to the Ohio Department of Natural Resources (ODNR), Division of Wildlife's (DOW) recommendations, TRC Companies, Inc. (TRC) completed a desktop habitat assessment, on behalf of the FirstEnergy Corporation, to determine if potential hibernaculum is present within the proposed Chrysler-Dowling 138kV Switch Replacement Project (Project) Study Area. The proposed Project is located in Perrysburg Township, Wood County, Ohio (**Appendix A, Figure 1** and **Figure 2**). The proposed Project involves the replacement of switches A-13137 and A-13118 on Structure 12690, on the existing Chrysler-Dowling 138kV transmission line. The Project Study Area occurs within an existing, maintained utility right-of-way on residential, commercial and agricultural land use, surrounded by railroad ROW and industrial land use, totaling 4.09 acres in size (**Appendix A, Figure 3**).

During the recommended desktop habitat assessment, secondary source information was utilized to determine if past or present underground resources were present within 0.25-mile of the Project Study Area. The secondary source information utilized included but was not limited to aerial imagery mapping (GoogleEarth, 2024), karst topography mapping (ODNR, 2023a), mine data mapping (ODNR, 2023b), and land cover dataset mapping (USGS, 2019).

Based on the mapping, a surface industrial mine was identified within 0.25-mile of the Project Study Area (**Appendix A, Figure 4**). The nearest historic surface mine is located approximately 0.6-mile south of the Project Study Area; the nearest surface industrial mine is located approximately 0.1-mile south of the Project Study Area; the nearest underground industrial mine is located 93 miles east of the Project Study Area; the nearest surface coal mine is located 104 miles southeast of the Project Study Area; and the nearest abandoned underground coal mine is located 34 miles east of the Project Study Area. The Project Study Area is located within a karst region, however no karst features such as sinkholes, caves, springs, or disappearing streams were observed during field investigation of the Project Study Area.

In addition, a surface water delineation was conducted by TRC on July 15, 2024, at which time summer and winter bat habitat was concurrently assessed. Based on the field investigations, no summer or winter bat habitat, or caves were identified within the Project Study Area. During field



investigations, photographs of the Project Study Area were taken, which depict the site conditions (**Appendix B**).

Due to the extensive surrounding agricultural land use, that the project is located within a maintained utility right-of-way, and that no summer or winter bat habitat were observed within the Project Study Area during field investigations, it is TRC's opinion that federally- or state- listed bats species are not likely to be impacted by this proposed Project. In addition, if minor tree clearing is needed as a result of this Project, it will take place within the USFWS recommended tree clearing dates (October 1 – March 31). We kindly request your concurrence that potential bat hibernaculum is not likely present within 0.25 mile of the Project Study Area.

Please do not hesitate to contact me at (330) 998-0481 or via email at JSlabe@TRCcompanies.com if you have any questions or require additional information.

Regards,

Jenna Slabe Ecologist

Appendices:

Appendix A: Figures

Figure 1: Site Location Map

Figure 2: Aerial Map

Figure 3: National Land Cover Database Map

Figure 4A: Karst Map Figure 4B: Mine Map

Appendix B: Photographic Record



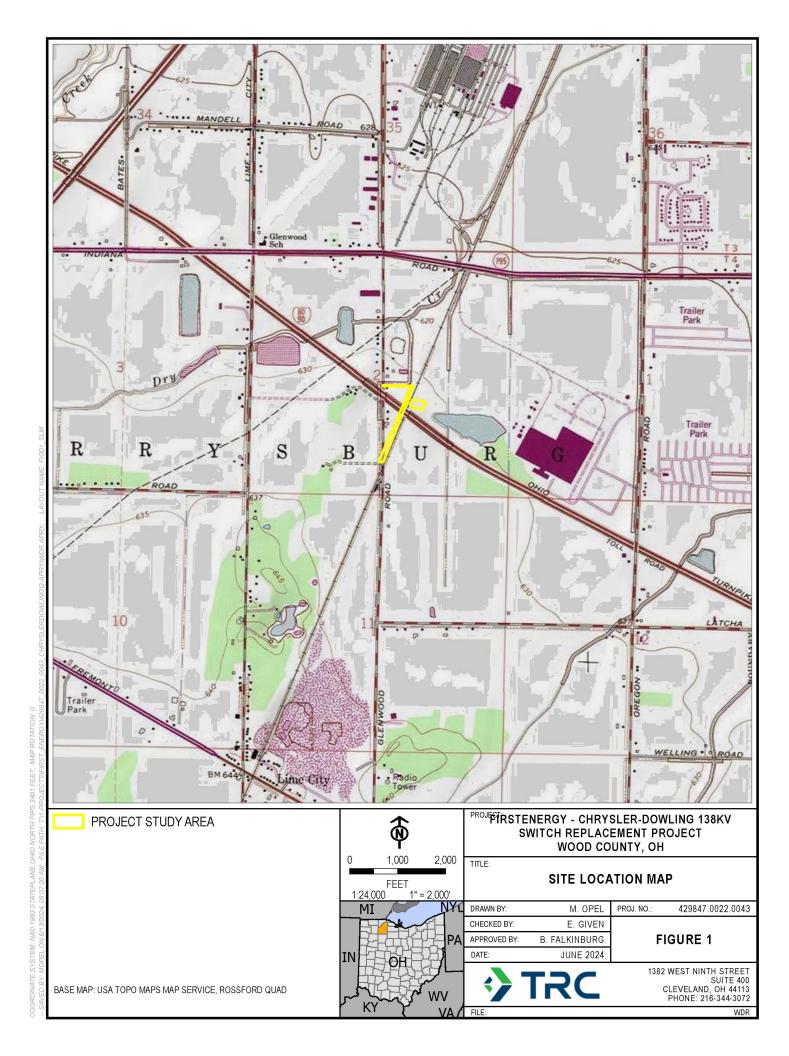
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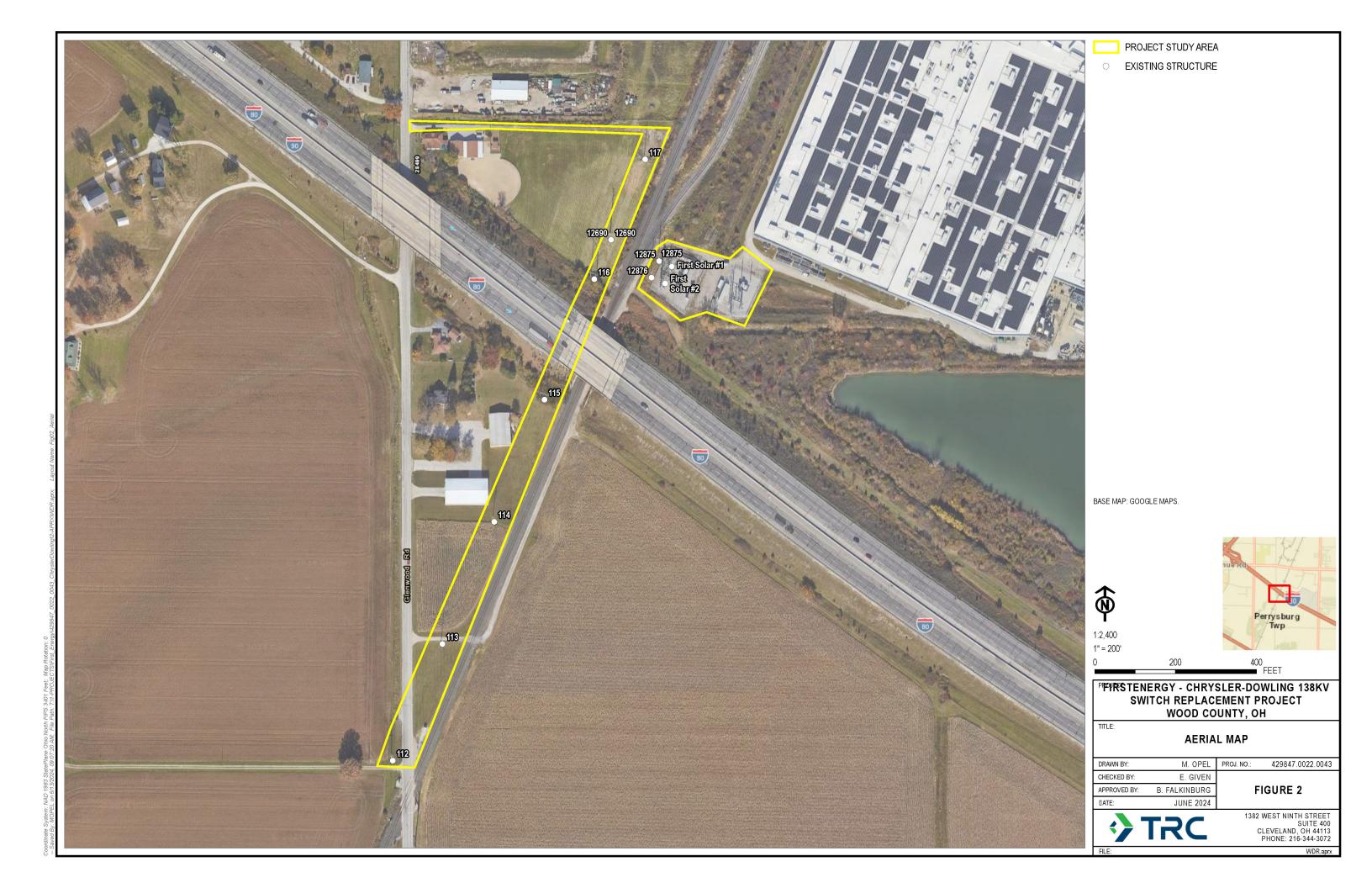
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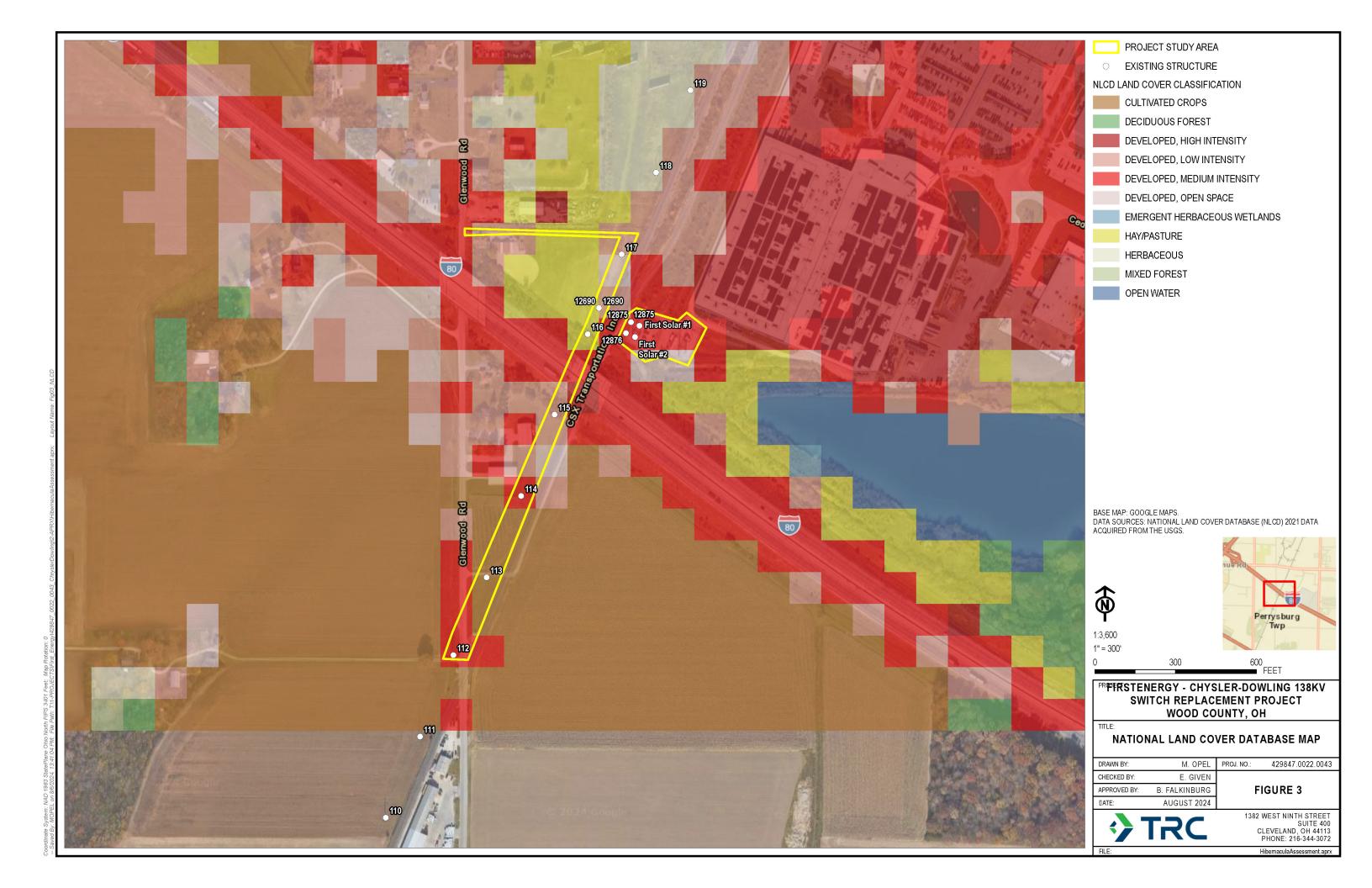


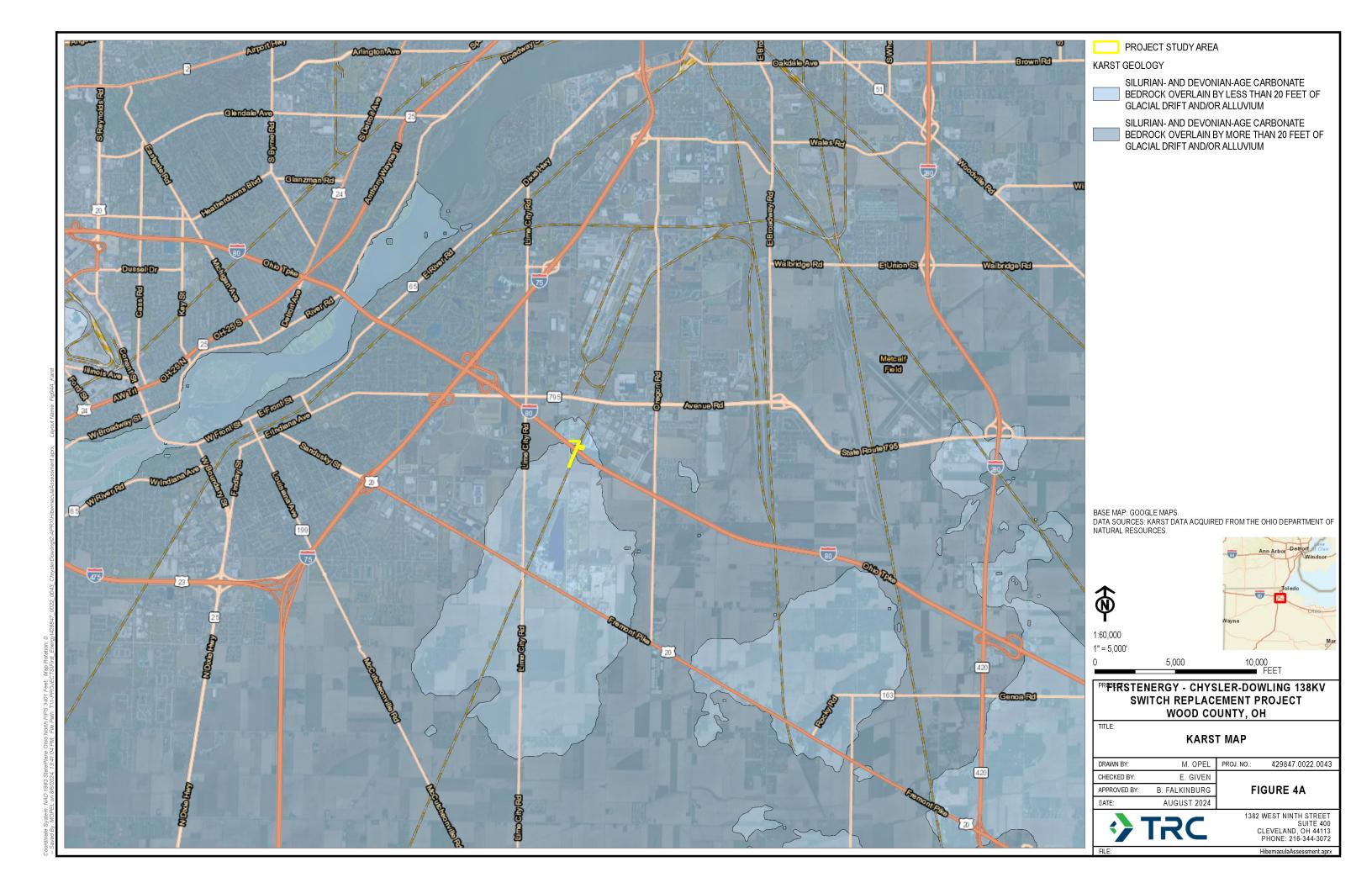
APPENDIX A

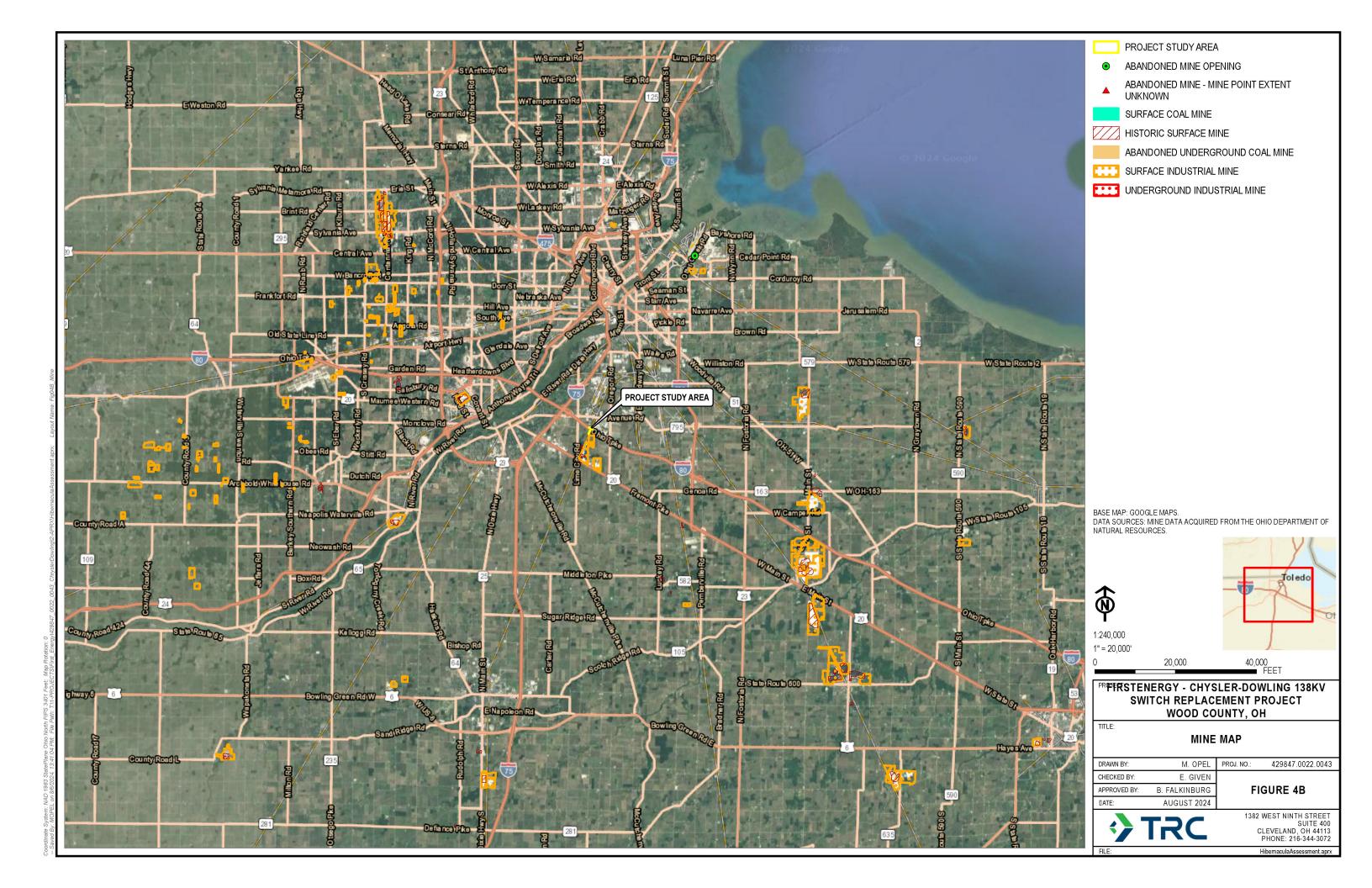
Figures













APPENDIX B

Photographic Record



Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 1.

Photo Date: July 15, 2024

Description:

Photo of the northern extent of the Project Study Area, facing east, showing maintained utility right-of-way.



Photo No. 2.

Photo Date:

July 15, 2024

Description:

Photo of the northern extent of the Project Study Area, facing south, showing maintained utility right-of-way.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 3.

Photo Date:

July 15, 2024

Description:

Photo of the southern extent of the Project Study Area, facing north, showing maintained utility and railroad right-of-way.



Photo No. 4.

Photo Date:

July 15, 2024

Description:

Photo of the southern extent of the Project Study Area, facing south, showing maintained utility and railroad right-of-way.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name: Site

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 5.

Photo Date: July 15, 2024

Description:

Representative photo of the Project Study Area, facing south, showing upland habitat.



Photo No. 6.

Photo Date:

July 15, 2024

Description:

Representative photo of the Project Study Area, facing north, showing upland habitat.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 7.

Photo Date: July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing north, showing the location of U-EVN-1.

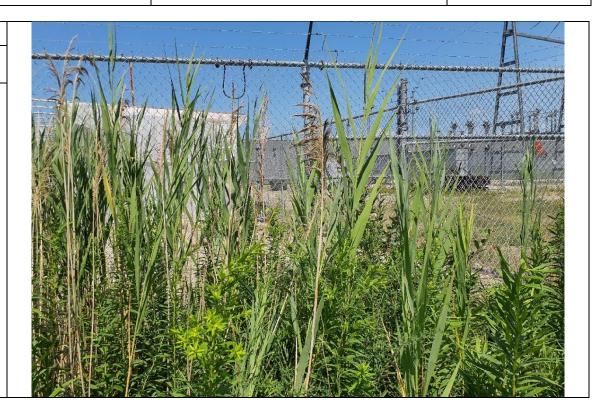


Photo No. 8.

Photo Date:

July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing east, showing the location of U-EVN-1.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 9.

Photo Date: July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing west, showing the location of U-EVN-1.



Photo No. 10.

Photo Date:

July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing south, showing gravel access drive.



EXHIBIT 6A

Stolarski, Adrianna

From: Eileen.Wyza@dnr.ohio.gov

Sent: Monday, August 26, 2024 1:06 PM

To: Slabe, Jenna

Cc: Falkinburg, Brad M (Ruszala, Amy M); Molnar, Maggie; Stolarski, Adrianna

Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Chrysler-Dowling 138kV

Switch Replacement Project

Follow Up Flag: Flag for follow up

Flag Status: Flagged

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Hello Jenna,

Per review of the desktop survey provided for FirstEnergy's Chrysler-Dowling 138kV Switch Replacement Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Therefore, the project is not likely to impact hibernating bats.

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

Thank you,

Eileen Wyza, Ph.D.

(she/her/hers) Wildlife Biologist Ohio Division of Wildlife Phone: 614-265-6764

Email: Eileen.Wyza@dnr.ohio.gov



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From: Slabe. Jenna

Please consider the environment before printing this email.

<JSlabe@trccompanies.com>

Sent: Monday, August 19, 2024 6:23 PM

To: Wyza, Eileen < Eileen. Wyza@dnr.ohio.gov>

Cc: Falkinburg, Brad <BFalkinburg@trccompanies.com>; Molnar, Maggie <MMolnar@trccompanies.com>; Stolarski,

Adrianna <astolarski@firstenergycorp.com>

Subject: Desktop Hibernacula Assessment: FirstEnergy's Chrysler-Dowling 138kV Switch Replacement Project

Eileen,

In response to ODNR's DOW recommendations (attached), TRC completed a desktop hibernacula assessment to determine if potential hibernaculum is present within FirstEnergy's proposed Chrysler-Dowling 138kV Switch Replacement Project located in Perrysburg Township, Wood County, Ohio.

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

Jenna Slabe

Ecologist
Planning, Permitting, and Licensing



CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



June 26, 2024

Project Code: 2024-0050957

Dear Emma Given:

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

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

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

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

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

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

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

Sincerely,

Erin Knoll

Field Office Supervisor

Ein Hell



June 24, 2024

Patrice Ashfield Field Office Supervisor U.S. Fish and Wildlife Service 4625 Morse Road, Suite 104 Columbus, OH, 43230

Request for Submittal Review (IPaC Project Code: 2024-0050957) regarding the Chrysler-Dowling 138kV Switch Replacement Project located in Perrysburg Township in Wood County, Ohio. (TRC Project No. 429847.0022.0043)

Dear Ms. Ashfield,

On behalf of the FirstEnergy Corporation, TRC Companies, Inc. (TRC) is requesting additional Technical Assistance regarding the proposed Chrysler-Dowling 138kV Switch Replacement Project (Project) due to a scope of work change that increased the Project Study Area. The initial request for Technical Assistance of the Project was sent on February 21, 2024, and correspondence was received from U.S. Fish and Wildlife Service on February 28, 2024. The Project is located in Perrysburg Township in Wood County, Ohio (**Figure 1**: Site Location Map). We are requesting updated information regarding Threatened and Endangered species, or their habitats that may be impacted by the proposed Project, as well as information regarding known locations of any known bald eagle nests, bat capture records, and bat hibernacula within a 5-mile radius of the proposed Project.

Project Location (latitude/longitude):

Northern Terminus: 41.557336, -83.555061 Eastern Terminus: 41.556306, -83.554767 Southern Terminus: 41.552975, -83.557514 Western Terminus: 41.557354, -83.557415

County: Wood County

Project Description: This Project involves the replacement of switches A-13137 and A-13118 on Structure 12690, on the existing Chrysler-Dowling 138kV transmission line. The original proposed Project Study Area was approximately 0.74-acre, and the updated proposed Project Study Area is 4.09 acres, located in Perrysburg Township in Wood County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (**Figure 2**: Aerial Map) occurs within an existing utility right-of-way (ROW) and substation, on residential and commercial land use, surrounded by railroad ROW, agricultural, and industrial land use. Currently as proposed, no tree clearing is anticipated within the Project Study Area.

On-site Habitat Description: Based on available desktop resources, TRC has identified the following habitats within the Project Study Area:

<u>Land Use:</u> Existing utility ROW and substation on residential and commercial land use, surrounded by railroad ROW, agricultural, and industrial land use.

<u>Wetlands:</u> The proposed Project Study Area does not include any National Wetlands Inventory features. A surface water delineation will be performed to determine the presence/absence of wetlands. Avoidance and minimization will be utilized during construction. If wetlands cannot be avoided, timber matting will be utilized during construction for avoidance.

<u>Streams:</u> The proposed Project Study Area does not include any National Hydrography Dataset streams. A surface water delineation will be performed to determine the presence/absence of streams. In-stream work is not anticipated as a result of this Project.

<u>Forested Area:</u> The proposed Project Study Area contains a minor amount of trees along the edges of residential and commercial land use. Currently as proposed, no tree clearing is anticipated within the Project Study Area.

<u>Uplands:</u> The proposed Project Study Area includes upland habitat within existing utility ROW on residential and commercial land use.

<u>Floodplains:</u> According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panel, 39173C0045D (eff. 9/2/2011), the proposed Project is not located within a FEMA-mapped 100-Year Flood Zone.

Potential Disturbance: It is anticipated that due to the nature of the Project, jurisdictional resources will not be impacted by the proposed Project activities. Avoidance and minimization will be utilized during construction. If wetlands and streams cannot be avoided, timber matting will be utilized during construction for any temporary impacts. The most current Best Management Practices will be followed during construction and disturbed areas will be restored to pre-construction conditions as much as applicable. No tree-clearing is anticipated within the Project Study Area. However, if minor tree clearing is needed as a result of this Project, it will take place within the USFWS recommended tree clearing dates (October 1 – March 31).

Please do not hesitate to contact me at (330) 446-2065 or via email at EGiven@TRCCompanies.com if you have any questions or require additional information.

Regards,

Emma Given, PhD

Emma Given

Ecologist

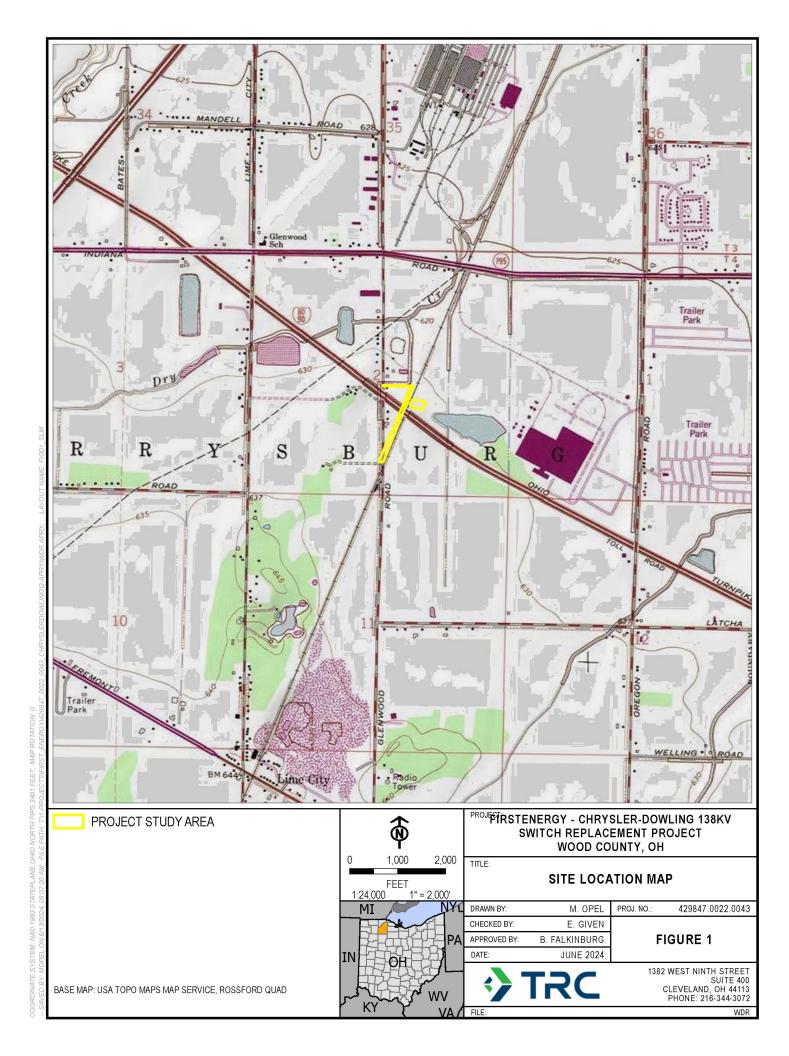
Attachments:

Figure 1: Site Location Map

Figure 2: Aerial Map

USFWS IPaC Official Species List





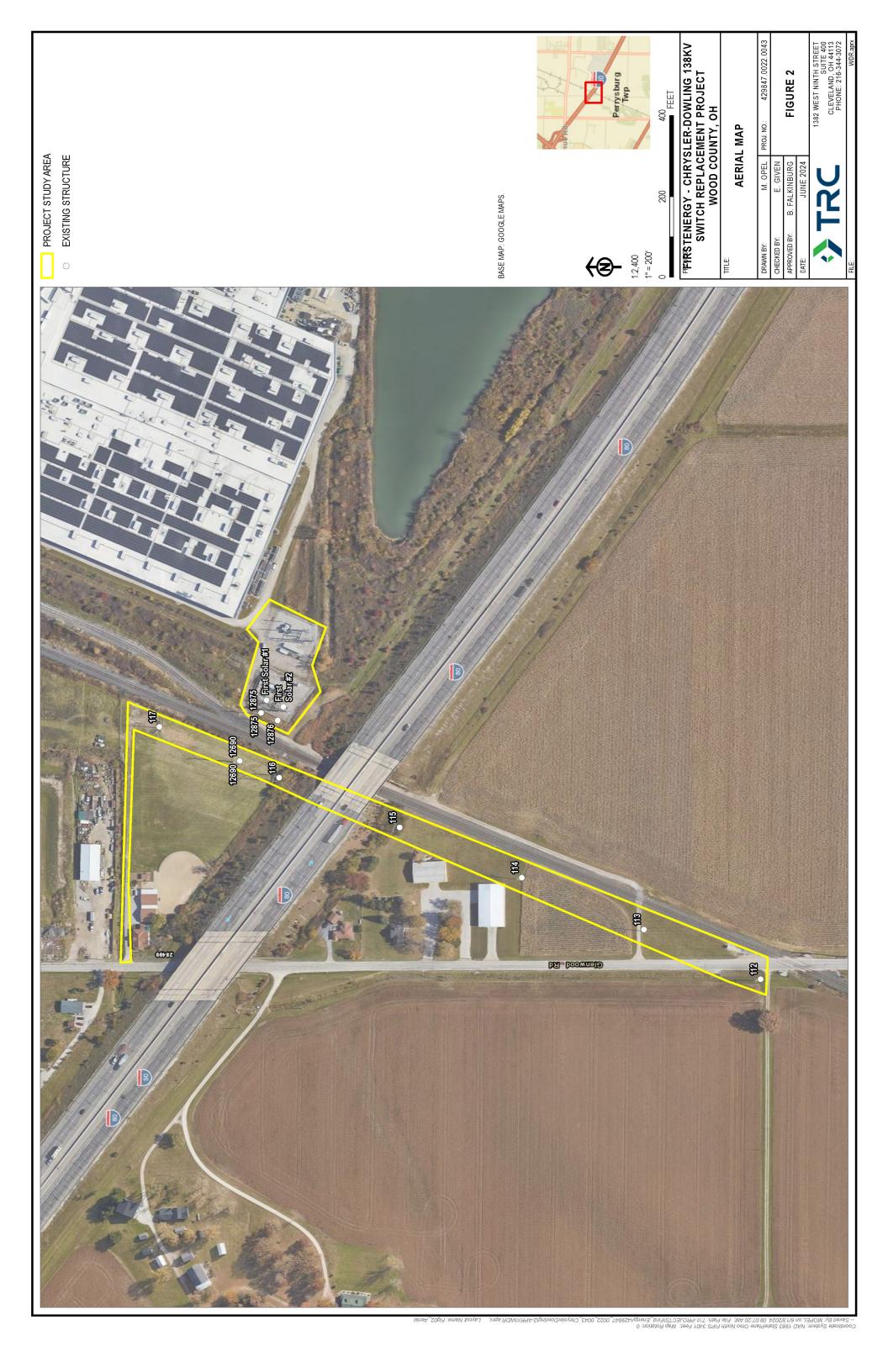


EXHIBIT 8

Stolarski, Adrianna

From: Molnar, Maggie < MMolnar@trccompanies.com>

Sent: Wednesday, July 17, 2024 9:03 AM

To: Stolarski, Adrianna

Cc: Falkinburg, Brad M (Ruszala, Amy M)

Subject: RE: [EXTERNAL] Survey Clearances- Chrysler Dowling and Dale Hartville

Attachments: Fig03_Delineation Chrysler-Dowling 138kV.pdf; Chrysler-Dowling Switch Project

Photographic Record.pdf

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Adrianna,

Please see the below field summary for FirstEnergy's Chrysler-Dowling 138kV Switch Replacement Project.

Field Summary:

On Monday, July 15, 2024, TRC biologists conducted a wetland and waterways delineation for the Chrysler-Dowling 138kV Switch Replacement Project located in Perrysburg Township, Wood County, Ohio. The Project Study Area is approximately 4.089-acres in total extent. This project involves the replacement of a switch on the existing Chrysler-Dowling 138kV line. Land use surrounding the Project Study Area was observed to be residential, commercial, agricultural, and industrial land use. No wetlands or streams were identified within the Project Study Area during the field survey and no other ecological resources were observed within the Project Study Area. To verify the absence of wetlands within the Project Study Area, two upland data points (U-EVN-1 and U-EVN-2) were collected and are shown on the attached delineated resources map. A total of two (2) non-jurisdictional ditches (NJDs) were identified within the Project Study Area during the field survey. See the attached delineated resources map, photographic record, and below for further details and description of the NJDs located within the Project Study Area.

NJDs:

Non-jurisdictional ditch NJD-EVN-1 is 69 linear feet within the Project Study Area. Non-jurisdictional ditch NJD-EVN-2 is 17 linear feet within the Project Study Area.

See the Delineated Resources Map and Photographic Record for more details.

Thank you,

Maggie Molnar, PWS

Ecologist



781 Science Boulevard, Suite 200, Gahanna, Ohio 43230 D 614.423.6342 C 614.949.2437

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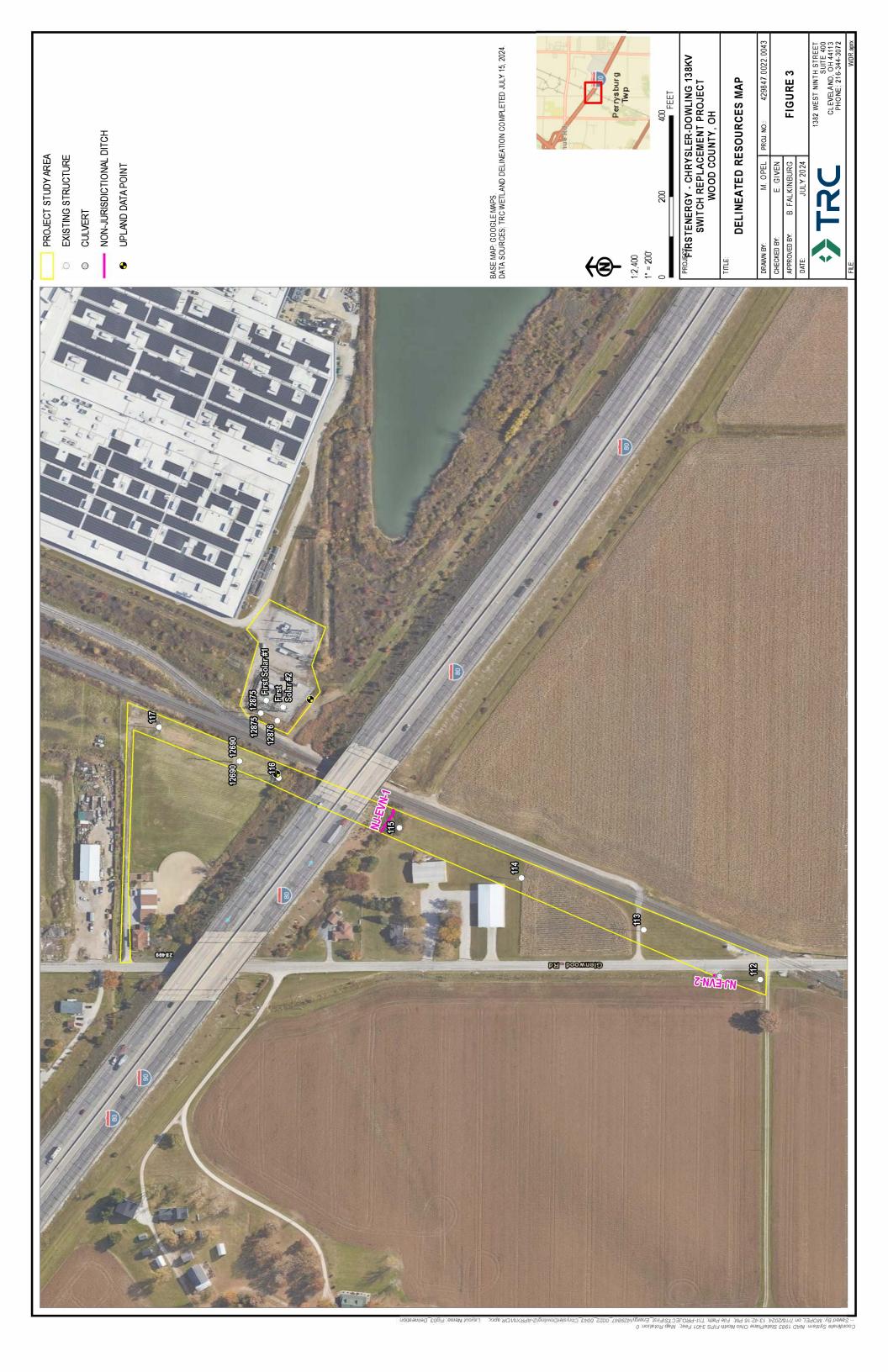
Please note that our address has changed.

From: Stolarski, Adrianna <astolarski@firstenergycorp.com>

Sent: Friday, July 12, 2024 10:59 AM

To: Molnar, Maggie < MMolnar@trccompanies.com>

Subject: RE: [EXTERNAL] Survey Clearances- Chrysler Dowling and Dale Hartville





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 1.

Photo Date: July 15, 2024

Description:

Photo of the northern extent of the Project Study Area, facing east, showing maintained utility right-of-way.



Photo No. 2.

Photo Date:

July 15, 2024

Description:

Photo of the northern extent of the Project Study Area, facing south, showing maintained utility right-of-way.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 3.

Photo Date:

July 15, 2024

Description:

Photo of the southern extent of the Project Study Area, facing north, showing maintained utility and railroad right-of-way.



Photo No. 4.

Photo Date:

July 15, 2024

Description:

Photo of the southern extent of the Project Study Area, facing south, showing maintained utility and railroad right-of-way.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name: Site

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 5.

Photo Date: July 15, 2024

Description:

Representative photo of the Project Study Area, facing south, showing upland habitat.



Photo No. 6.

Photo Date:

July 15, 2024

Description:

Representative photo of the Project Study Area, facing north, showing upland habitat.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 7.

Photo Date: July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing north, showing the location of U-EVN-1.

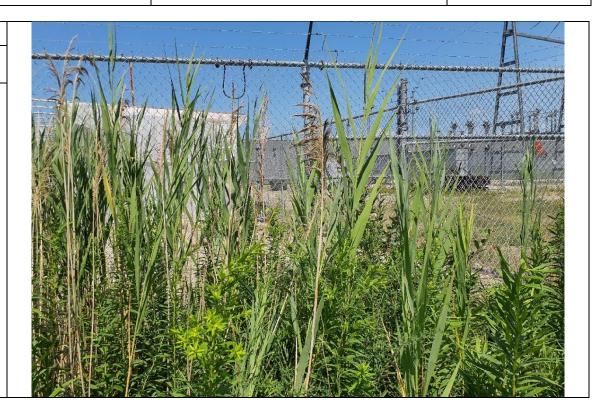


Photo No. 8.

Photo Date:

July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing east, showing the location of U-EVN-1.





Chrysler-Dowling 138kV Switch Replacement Project

Client Name:

Site Location:

Project No.

FirstEnergy

Perrysburg Township, Wood County, Ohio

429847.0022.0043

Photo No. 9.

Photo Date: July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing west, showing the location of U-EVN-1.



Photo No. 10.

Photo Date:

July 15, 2024

Description:

Representative photo of the Project Study Area surrounding the existing substation, facing south, showing gravel access drive.

