

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

**LETTER OF NOTIFICATION**

**FULTON-NORTH STAR STEEL SYDNEY 345 KV AND  
MELBOURNE-SYDNEY 345 KV TRANSMISSION LINE  
RELOCATIONS PROJECT**

**OPSB CASE NO.: 25-0772-EL-BLN**

**November 17, 2025**

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

**LETTER OF NOTIFICATION**  
**FULTON-NORTH STAR STEEL SYDNEY 345 kV AND**  
**MELBOURNE-SYDNEY 345 kV TRANSMISSION LINE RELOCATIONS PROJECT**  
**OPSB CASE No. 25-0772-EL-BLN:**

The following information is being provided in accordance with the procedures in the Ohio Administrative Code (“Adm.Code”) Chapter 4906-6 for the submission and review of Accelerated Certificate Applications. Based upon the requirements found in Appendix A to Adm.Code 4906-1-01, this Project qualifies for submittal to the Ohio Power Siting Board (“OPSB”) as a Letter of Notification application (“Application”).

**4906-6-05: ACCELERATED APPLICATION REQUIREMENTS**

**4906-6-05: Name and Reference Number**

Name: Fulton-North Star Steel Sydney 345 kV and Melbourne-Sydney 345 kV Transmission Line Relocations Project (“Project”)

Reference Number: 3169

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

American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, is proposing to relocate the Fulton-North Star Steel 345 kV Transmission Line exit at the existing Fulton Substation, relocate the Fulton-North Star Steel Sydney 345 kV Transmission Line exit at Sydney Substation, and relocate the Melbourne-Sydney 345 kV Transmission Line Connections at Melbourne Substation. The general location of the Project is shown in Exhibit 1-1, a partial copy of the United States Geologic Survey, Fulton County OH, Quad Map. Exhibit 2-1 is a partial copy of ESRI aerial imagery. Exhibits 3-1 and 3-2 provide the general layout of the Project. The Project is in Fulton and York Townships, Fulton County, Ohio.

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Fulton-North Star Steel Sydney 345 kV and  
Melbourne-Sydney 345 kV Transmission Line  
Relocations Project

To construct the Fulton-North Star Steel Sydney 345 kV Transmission Line relocation at Fulton Substation, and as shown in Exhibit 3-1, ATSI is replacing existing structure No. NS69 with a new single steel monopole transmission structure on a concrete foundation approximately 50' to the east of its current location. The existing three-pole deadend steel Structure No. NS70 will be removed. In addition to the structure replacement, the Fulton-North Star Steel Sydney 345 kV Transmission Line will connect from new Structure No. NS69 to existing Structure No. AM70 and extend to Fulton Substation.

The existing Fulton-North Star Steel Sydney 345 kV Transmission Line that currently connects to the North Star Steel Sydney Substation will be disconnected and redirected to connect to the new Melbourne Substation. This transmission line connection was identified in OPSB Case No. 22-0248-EL-BTX as being part of a future filing. As shown in Exhibit 3-2, the existing Fulton-North Star Steel Sydney 345 kV Transmission Line will continue south from a new Structure No. 3, which will be located approximately 78 feet north of existing Structure No.3, which will be removed and proceed to Melbourne Substation. Two new single monopole transmission line structures on concrete foundations (Structures No. 2 and No. 3) and one new double circuit transmission line structure on a concrete foundation (Structure No. 1). As a result of the new transmission line termination to Melbourne Substation, the new transmission line connection will be known as the Fulton-Melbourne 345 kV Transmission Line. In addition, the existing transmission line conductor that extends between current Structure No. 3 and current Structure No. 2 (which will also be removed as part of this Project) on the Fulton-North Star Steel Sydney 345 kV Transmission Line will be removed.

As approved in OPSB Case No. 22-0248-EL-BTX, the Dowling-Melbourne 345 kV Transmission Line connects to the Melbourne Substation, a 4-breaker ring bus substation, on the north side of the substation. As a result of the need for the reconfiguration of the substation from a 4-breaker ring bus to a 6-breaker ring bus inside the approved fenceline, the Dowling-Melbourne 345 kV Transmission Line exit will shift to the east approximately

26 feet. From this exit location, the Dowling-Melbourne 345 kV Transmission Line will attach to Structure No. 1, a double circuit steel monopole structure on a concrete foundation. The aforementioned Fulton-Melbourne 345 kV Transmission Line will also attach to this structure to enter Melbourne Substation as shown in Exhibit 3-2.

The Melbourne-North Star Steel Sydney No. 1 and No. 2 345 kV Transmission Line Connections to Melbourne Substation, as approved in OPSB Case No. 22-0248-EL-BTX, will be relocated from the east side of the substation to the south side of the substation as a result of the substation reconfiguration. Subsequently, the alignment of the transmission line connections will be adjusted. As shown in Exhibit 3-2, both the Melbourne-North Star Steel Sydney No. 1 and No. 2 345 kV Transmission Lines will exit Melbourne Substation on the south and extend from Structure No.5 to Structure No.4 and then to Structure No. 3, all double circuit steel monopole structures on concrete foundations. From this point the Melbourne-North Star Steel Sydney No.1 and No.2 345 kV Transmission Lines separate and diverge towards the OPSB Approved alignments being supported on Structures No.2-1 and No. 2-2 that shift to the west of their approved locations.

The structures needed for these transmission line relocations were approved in OPSB Case No. 22-0248-EL-BTX, Opinion and Order (May 16, 2024).

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

The Project meets the requirements for a Letter of Notification because the Project is within the types of projects defined by Item (1)(b) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm. Code 4906-1-01. These item states:

*(1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*



*(b) Line(s) greater than 0.2 miles in length but not greater than two miles in length.*

The proposed Project is within the requirements of Item (1)(b) because it involves the relocation of single or multiple circuit transmission lines and structures and the addition of structures on existing transmission lines for a distance greater than 0.2-miles but not greater than two miles in length.

**4906-6-05 (B)(2): Need For the Project<sup>1</sup>**

The need for the Dowling-Fulton 345 kV Transmission Line Tap to Melbourne Substation Project was addressed and considered in the previous application filing and the subsequent OPSB Opinion, Order and Certificate approving the original Application (OPSB Case No. 22-0248-EL-BTX, Opinion and Order (May 16, 2024)) and can be found in Section 2 of the Application docketed in that proceeding (Application, (March 7, 2023)). The adjustments to the OPSB Approved Route proposed in this Amendment Application are necessary based upon more detailed engineering and accommodation of the proposed substation reconfiguration.

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

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2025 Long-Term Forecast Report (“LTFR”). This map was submitted to the PUCO in Case No. 25-0504-EL-FOR under Adm.Code 4901:5-5:04 (C)(2)(b). The map is incorporated by reference only. This map shows ATSI’s 345 kV and 138 kV transmission

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<sup>1</sup> The Project need was presented as a Supplemental Project to the PJM Regional Transmission Expansion Plan (“RTEP”) at the Transmission Expansion Advisory Committee on November 22, 2019, and the solution was presented November 4, 2020. The Project was assigned a supplemental number s2576.

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Fulton-North Star Steel Sydney 345 kV and  
Melbourne-Sydney 345 kV Transmission Line  
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lines and transmission substations including the Fulton-North Star Steel Sydney 345 kV Transmission Line. The Project is included on page 77 of the Long-Term Forecast Report.

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

Consideration of the proposed adjustments is based on further engineering analysis. At each proposed relocation, the area was carefully reviewed to identify potential ecological and social impacts associated with various potential alignments. The proposed adjusted routes represent the best engineering solution to the requests made by the impacted property owners and customer while minimizing other impacts.

**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 has also established a project website, through which a copy of this Letter of Notification Application can be accessed: [https://www.firstenergycorp.com/about/transmission\\_projects/ohio.html](https://www.firstenergycorp.com/about/transmission_projects/ohio.html).

ATSI will publish notice of the Project in The Northwest Signal, and the Toledo Blade, within 7 days of filing this Letter of Notification Application. The notice will comply with Adm.Code 4906-6-08(A)(1)-(6).

During all phases of this Project, 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](mailto:transmissionprojects@firstenergycorp.com).

ATSI's manager of External Affairs will advise local officials of the status of the proposed Transmission Line Project as necessary.

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

The Applicant is prepared to begin construction as early as February 20, 2026, and the Project is expected to be completed and placed in-service by December 2026.

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

A map of the overall Project area was included in original approved Application (OSPB Case No. 22-0248-EL-BTX) and can be found in Figures 2-1 and 2-2. The locations of the proposed adjustments to the Approved Project are provided in Exhibits 1 and 2 to this Application.

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

The Project is located entirely within the right-of-way approved in the original Application (OSPB Case No. 22-0248-EL-BTX), on Parcel No. 13-022508-00.000, owned by Gombash Farms, LLC, Parcel No. 29-056376-00.000, owned by North Star Bluescope Steel, LLC, and Parcel No. 29-056472-00.000, owned by Worthington Steel Company c/o Clarus Partners. No additional 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 change of the OPSB Approved Route will not change the 345 kV transmission line operating characteristics that were considered in the Application filing and the subsequent OPSB Opinion, Order and Certificate of the Application (OSPB Case No. 22-0248-EL-BTX) and can be found on page 5-5 of the original Application.

The Project includes the construction of the proposed Melbourne Substation considered in the Application filing and the subsequent OPSB Opinion, Order and Certificate of the Application (22-0248-EL-BTX) and can be found on page 05-7 of the original Application. The change of the Melbourne Substation equipment as a result of the substation reconfiguration is listed below.

The following equipment will be part of the substation reconfiguration:

- 345 kV Circuit Breakers – ~~(4)~~ (6)

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- 345 kV Breaker Disconnect Switches – ~~(40)~~ (12) Sets of 3
- 345 kV Line Exit GOAB – (4) Sets of 3
- 345 kV Capacitive Voltage Transformer “CCVT” – ~~(4)~~ (6) Sets of 3
- 345 kV Wave Trap – (4)
- Control Enclosure ~~(23’x37’)~~ (28’x58’) – (1)

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

The change to the OPSB Approved Route will not significantly change the electro-magnetic field (EMF) calculations that were considered in the Application filing and the subsequent OPSB Opinion, Order and Certificate of the Application (OPSB Case No. 22-0248-EL-BTX) and can be found on pages 07-1 through 07-6 of the original Application.

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

The change to the OPSB Approved Route will not significantly affect the estimated capital costs for the Project that were considered in the Application filing and the subsequent OPSB Opinion, Order and Certificate of the Application (OPSB Case No. 22-0248-EL-BTX), however, the cost of the two additional breakers increases the costs recorded in FERC Account Number 353 for both the Preferred and Alternate Route in Table 6-1 of the Application by approximately \$770,000.

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

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

The proposed change to the OPSB Approved Route crosses land use that was considered in the Application filing and the subsequent OPSB Opinion, Order and Certificate of the Application (OPSB Case No. 22-0248-EL-BTX) and can be found on page 07-8 of the original Application. No changes to the impacted land use are anticipated as a result of the shifts from the Approved Route to the adjusted route.

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

The change to the OPSB Approved Route crosses a similar percentage of agricultural land that was considered in the original Application filing and the May 16, 2024, OPSB Opinion, Order and Certificate for the Application (OPSB Case No. 22-0248-EL-BTX) and can be found on page 07-14 of the original Application.

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

An investigation and report of cultural resources were considered in the supplemental filing and the May 16, 2024, OPSB Opinion, Order and Certificate for the Application (OPSB Case No. 22-0248-EL-BTX) and can be found in the Supplemental filing in that docket dated March 20, 2023, and OHPO concurrence letter filed on April 10, 2023. OHPO's response dated April 4, 2023, included as Exhibit 6 to this Application, concurred that the Project will have no effect on historic properties. No further coordination regarding architectural resources is warranted.

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

There are no known additional local, state, or federal requirements that must be met prior to commencement of construction of the changes proposed to the OPSB Approved Route.

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

An investigation of endangered or threatened species was considered in the original Application filing and the May 16, 2024, OPSB Opinion, Order and Certificate for the Application (OPSB Case No. 22-0248-EL-BTX) and can be found on pages 8-21 through 8-28 of the original Application.

Additional ODNr and USFWS consultations were conducted by Jacobs, on behalf of ATSI, in September 2025, to address the changes from the original Application. The ODNr's response dated October 9, 2025, included as Exhibit 4 to this Application, indicated the

presence of one (1) additional state threatened (Kirtland's Snake (*Clonophis kirtlandii*)) and one (1) additional state species of concern (Creek Heelsplitter (*Lasmigona compressa*)) within one (1) mile of the Project area, but none recorded in the Project boundary.

ODNR recommended that if a habitat assessment for projects involving subsurface disturbance finds that a potential hibernaculum is present within 5 miles of the project area, consultation should be made with ODNR for project recommendations. ODNR also noted that if no tree clearing or subsurface impacts to a hibernaculum are proposed, this Project is not likely to impact these species. ODNR concluded that due to the potential for impacts to federally listed species, as well as to state-listed species, this Project be coordinated with the US Fish & Wildlife Service.

The USFWS's response dated September 19, 2025, indicated that due to the Project type, size, location, and the proposed implementation of seasonal tree cutting, they do not anticipate adverse effects to any federally endangered, threatened, or proposed species, or proposed or designated critical habitat. A copy of USFWS's Ecological Review response is included as Exhibit 5.

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

Consultations with the ODNR and the USFWS for 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 were considered in the original Application filing and the May 16, 2024 OPSB Opinion, Order and Certificate for that Application (OPSB Case No. 22-0248-EL-BTX) and can be found on pages 8A-1 through 8A-5 of the original Application.

Additional ODNR and USFWS consultations were conducted by Jacobs, on behalf of ATSI, in September 2025. ODNR's response dated October 9, 2025, included as Exhibit 4 to this Application, did not indicate the presence of any areas of ecological concern within the

vicinity of the Project area. The USFWS's response on September 19, 2025, did not indicate any federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area. A copy of USFWS's Ecological Review response is included as Exhibit 5 to this Application.

**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 Letter of Notification Transmittal and Availability for Public Review**

This Letter of Notification Application is being provided concurrently with its docketing with the Board to the following officials in Fulton and York Townships, Fulton County Ohio.

**Fulton County**

Commissioner Jon Rupp,  
President  
Fulton County Commissioners  
152 S. Fulton Street, Suite 270  
Wauseon, OH 43567  
[jonrupp@fultoncountyoh.com](mailto:jonrupp@fultoncountyoh.com)

Commissioner Jeff Rupp,  
Vice President  
Fulton County Commissioners  
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Commissioner Joe Short,  
Fulton County Commissioners  
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Wauseon, OH 43567  
[joeshort@fultoncountyoh.com](mailto:joeshort@fultoncountyoh.com)

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Fulton County Engineer  
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Wauseon, OH 43567  
[fonweller@fultoncountyoh.com](mailto:fonweller@fultoncountyoh.com)

Dannis Kennedy,  
Fulton County Administrator  
152 S. Fulton St., Suite 270  
Wauseon, OH 43567  
[denniskennedy@fultoncountyoh.com](mailto:denniskennedy@fultoncountyoh.com)

### **Fulton Township**

Scott Gillens, Trustee  
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10555 County Road 4  
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[scott.gillens@plantpioneer.com](mailto:scott.gillens@plantpioneer.com)

Joe Gombash, Trustee  
Fulton Township  
10555 County Road 4  
Swanton, OH 43558  
[jlgumby@gmail.com](mailto:jlgumby@gmail.com)

### **York Township**

Mark Jones, Trustee  
York Township  
PO Box 248  
Delta, OH 43515  
[lamppjones@windstream.net](mailto:lamppjones@windstream.net)

Joseph Howard, Trustee  
York Township  
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Delta, OH 43515  
[jphoward@yahoo.com](mailto:jphoward@yahoo.com)

### **Libraries**

Candy Baird, Director  
Delta Public Library  
402 Main Street  
Delta, OH 43515  
[bairdca@deltapubliclibrary.org](mailto:bairdca@deltapubliclibrary.org)

Christy Shadbolt, Director  
Fulton County Regional Planning  
Commission  
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[christyshadbolt@fultoncountyoh.com](mailto:christyshadbolt@fultoncountyoh.com)

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Julie Szabo, Fiscal Officer  
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Jeffrey Mazurowski, Trustee  
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[jeffmazurowski@pdys.org](mailto:jeffmazurowski@pdys.org)

Janelle DeBacker, Fiscal Officer  
York Township  
PO Box 248  
Delta, OH 43515  
[yorktownshipoh@gmail.com](mailto:yorktownshipoh@gmail.com)

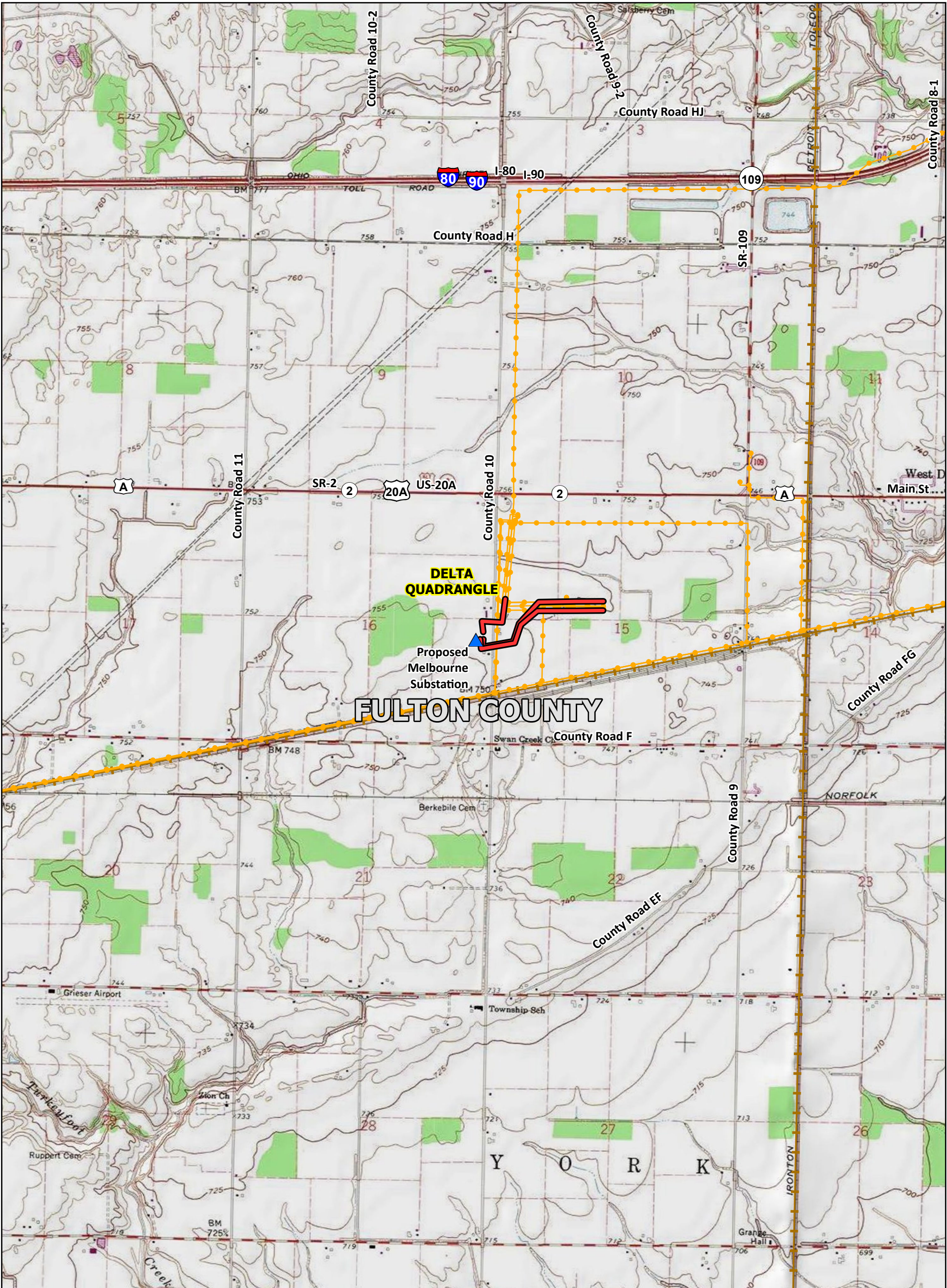
Staci Treece, Director  
Swanton Public Library  
305 Chestnut Street  
Swanton, OH 43558  
[swantonpl@gmail.com](mailto:swantonpl@gmail.com)



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).

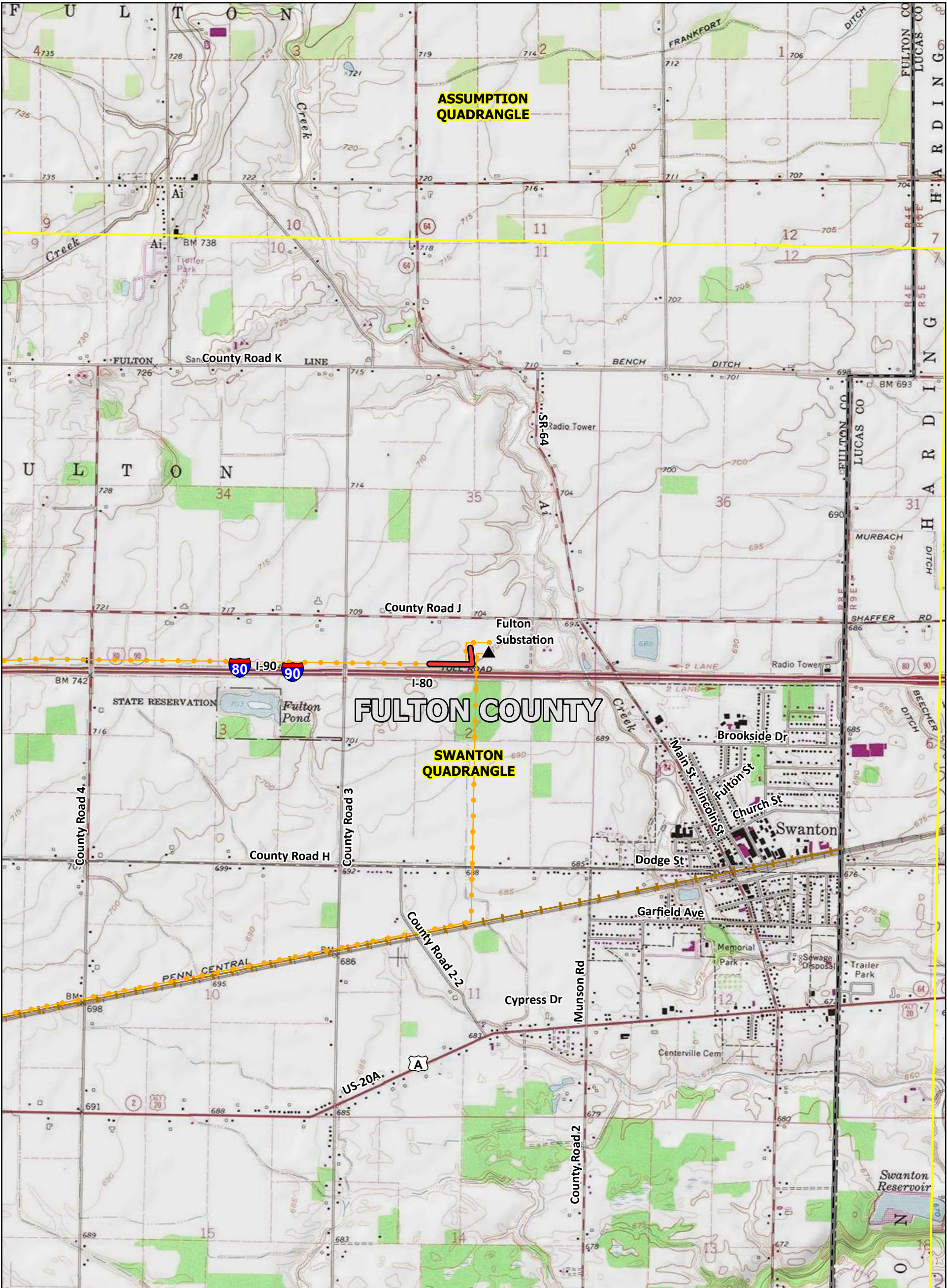
Information is posted at [www.firstenergycorp.com/about/transmission\\_project/ohio.html](http://www.firstenergycorp.com/about/transmission_project/ohio.html) on how to request an electronic or paper copy of this Letter of Notification Application. The link to this website is being provided in accordance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





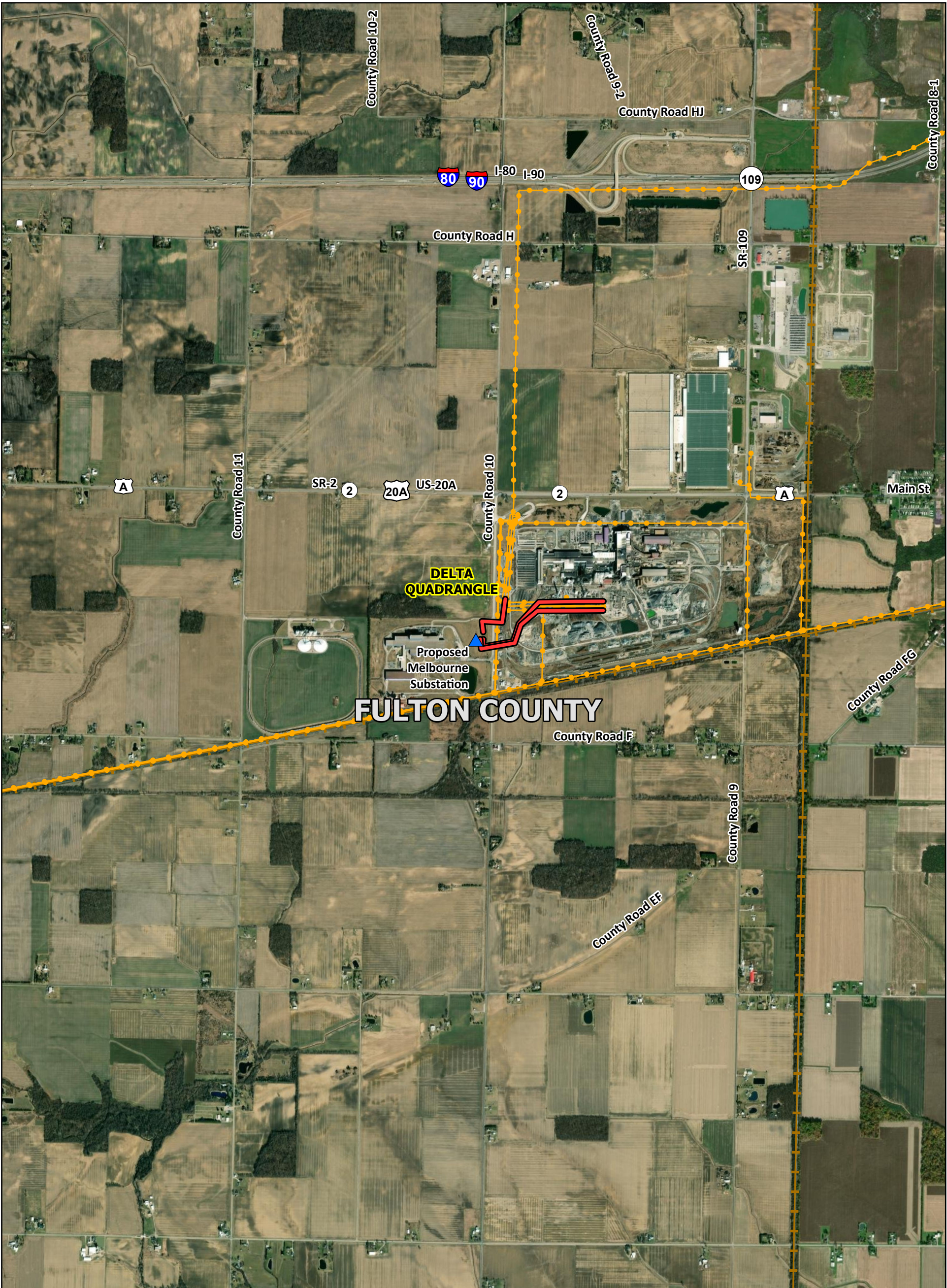
<b>Legend</b> <ul style="list-style-type: none"><li>Proposed Project Alignment</li><li>Substation</li><li>Proposed Substation</li><li>Existing Transmission Line</li><li>Railroad</li><li>County Boundary</li><li>Topographical Quadrangle Boundary</li></ul> USA Topo Maps	<b>Locator Map</b>	<b>BASE MAP SOURCE:</b> USGS topo Map		<b>ATSI</b> <small>American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.</small>		345 kV Transmission Line Connections to Melbourne Substation Project	
				<b>Exhibit 1-1</b> <b>TOPOGRAPHIC OVERVIEW MAP</b>			
				PN: D3500900		DATE: 9/25/2025	
				CREATED BY: CM		<b>Jacobs</b>	
REVIEWED BY: BO							



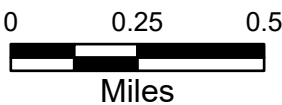


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				<b>Exhibit 1-2</b> <b>TOPOGRAPHIC OVERVIEW MAP</b>			
				PN: D3500900		DATE: 9/25/2025	
				CREATED BY: CM		<b>Jacobs</b>	
REVIEWED BY: BO							

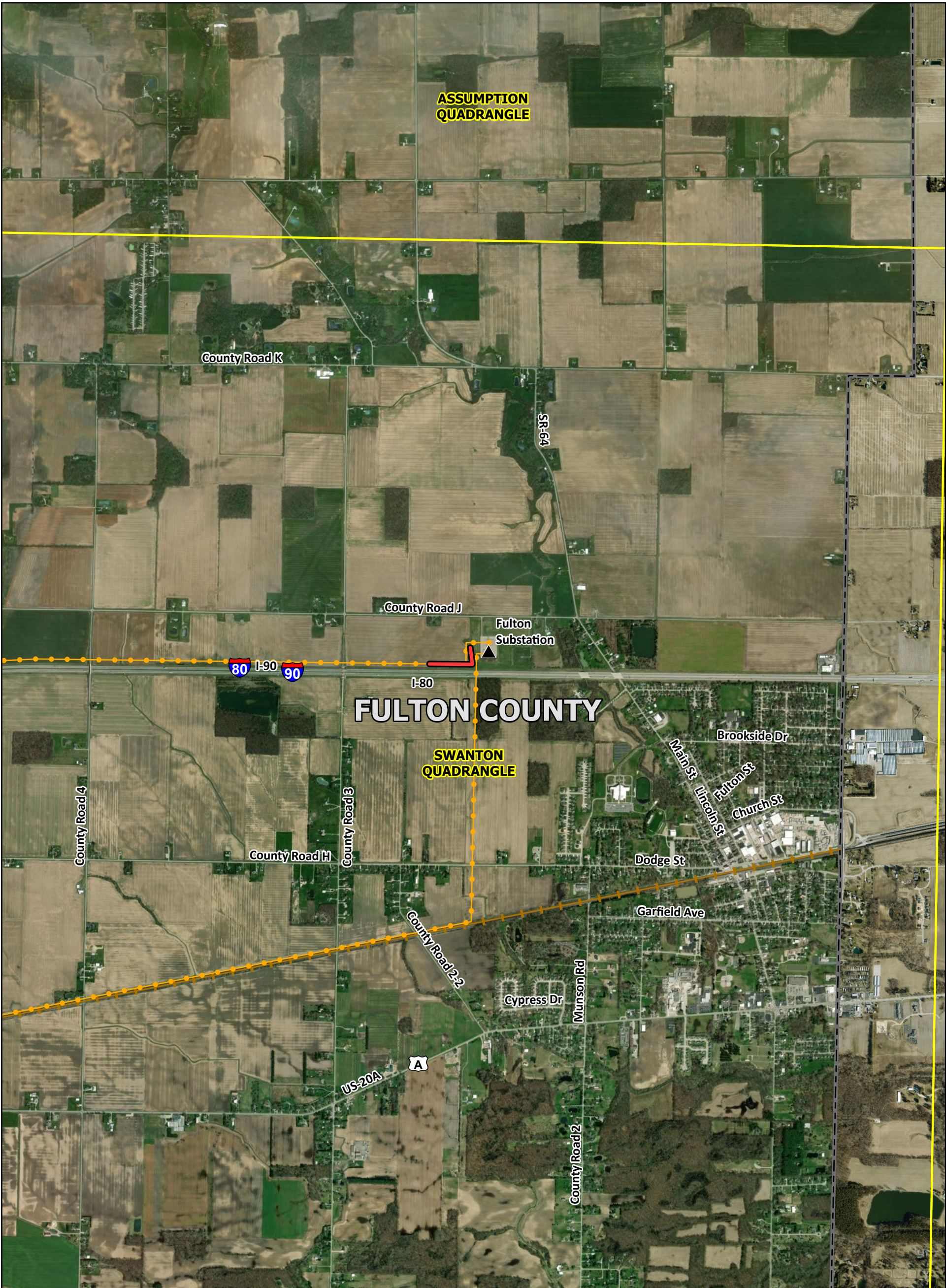




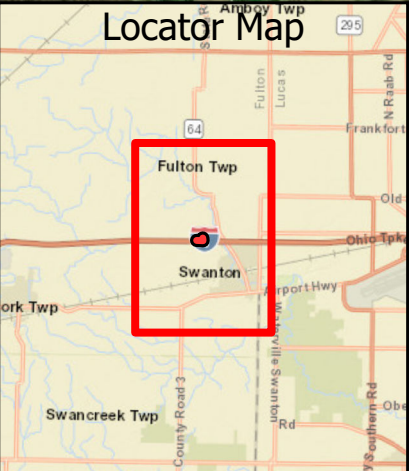
<b>Legend</b> <ul style="list-style-type: none"><li>Proposed Substation</li><li>Substation</li><li>Proposed Project Alignment</li><li>Existing Transmission Line</li><li>Railroad</li><li>County Boundary</li><li>Topographical Quadrangle Boundary</li></ul>	<b>Locator Map</b>	<b>BASE MAP SOURCE:</b> ESRI World Imagery		<b>ATSI</b> <small>American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.</small>		345 kV Transmission Line Connections to Melbourne Substation Project	
				<b>EXHIBIT 2 - 1</b> AERIAL OVERVIEW MAP			
				PN: D3500900		DATE: 9/25/2025	
				CREATED BY: CM		<b>Jacobs</b>	
REVIEWED BY: BO							



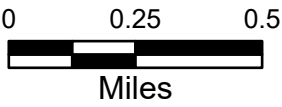




- Legend**
- Proposed Substation
  - Substation
  - Proposed Project Alignment
  - Existing Transmission Line
  - Railroad
  - County Boundary
  - Topographical Quadrangle Boundary



BASE MAP SOURCE:  
ESRI World Imagery



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

345 kV Transmission Line  
Connections to Fulton  
Substation Project

EXHIBIT 2 - 2  
AERIAL OVERVIEW MAP

PN: D3500900

DATE: 9/25/2025

CREATED BY: CM

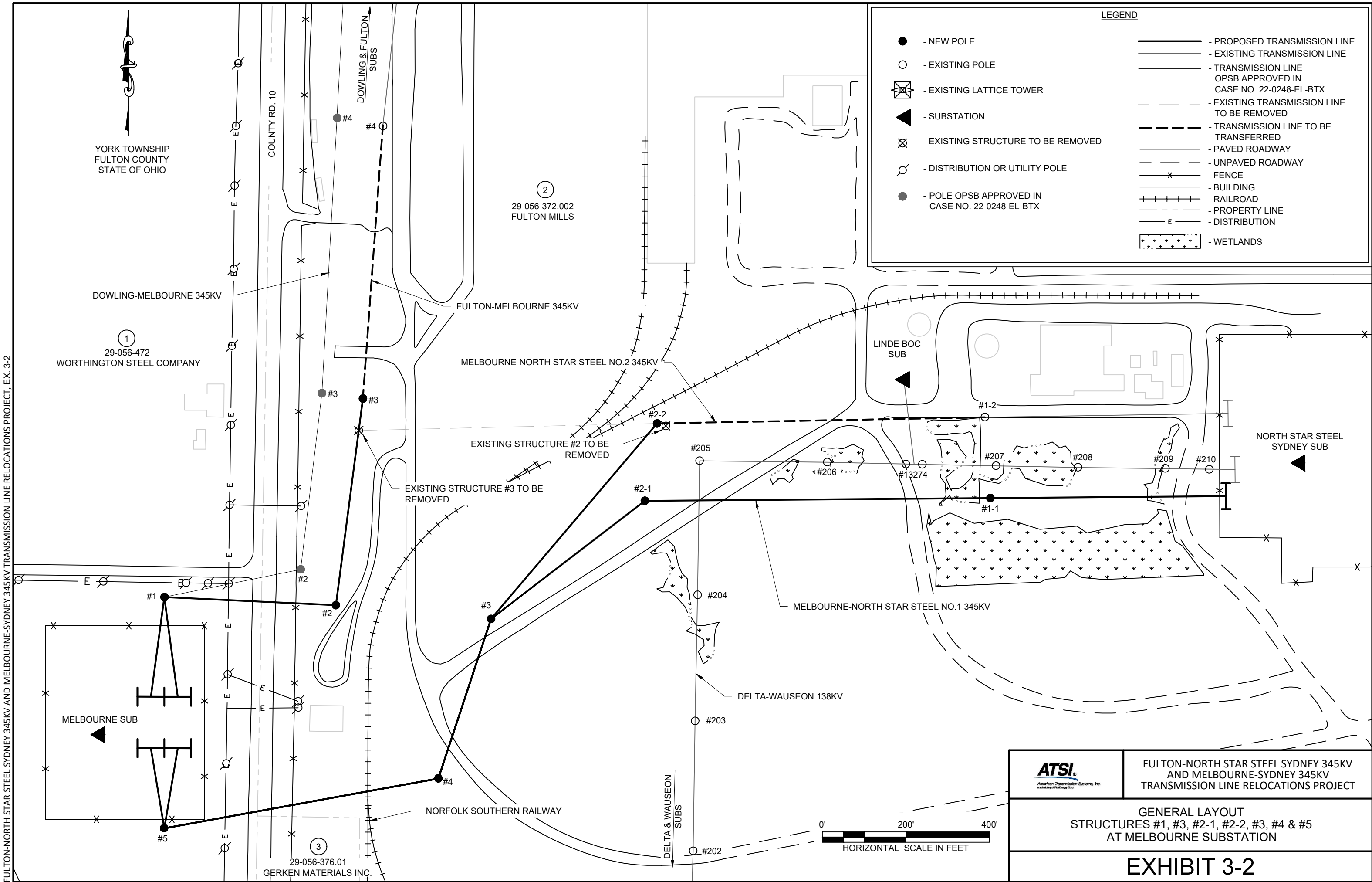
REVIEWED BY: BO

**Jacobs**





FULTON-NORTH STAR STEEL SYDNEY 345KV AND MELBOURNE-SYDNEY 345KV TRANSMISSION LINE RELOCATIONS PROJECT, EX. 3-2



FULTON-NORTH STAR STEEL SYDNEY 345KV  
AND MELBOURNE-SYDNEY 345KV  
TRANSMISSION LINE RELOCATIONS PROJECT

GENERAL LAYOUT  
STRUCTURES #1, #3, #2-1, #2-2, #3, #4 & #5  
AT MELBOURNE SUBSTATION

EXHIBIT 3-2



Department of  
Natural Resources  
ohiodnr.gov

# EXHIBIT 4

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

## Office of Real Estate & Land Management

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

October 9, 2025

Jake Lubbers  
Jacobs Engineering Group, Inc.  
2 Crowne Point Court, Suite 100  
Cincinnati, Ohio 45241

**Re:** 25-1371\_Fulton-Sydney Extension and Melbourne Substations

**Project:** The proposed project involves the adjustment of the Fulton-North Star Steel 345 kV transmission line to Melbourne Substation, the connection of 345kV Tie-Lines from Melbourne Substation to Sydney Substation, and the relocation of structure NS-69 adjacent to Fulton Substation.

**Location:** The proposed project is located in Fulton and York townships, Fulton 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 data within one mile of the project area:

Kirtland's Snake (*Clonophis kirtlandii*), T  
Creek Heelsplitter (*Lasmigona compressa*), SC

Conservation status abbreviations are as follows: 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 = federally endangered, and FT = federally threatened. The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Features searched include locations of rare and endangered plants and animals determined to be of value to the conservation of their species, high quality plant communities, animal breeding assemblages, and outstanding geological features.

The species listed above are not recorded within the boundaries of the specified project area. However, please note that Ohio has not been completely surveyed and we rely on receiving information from



many sources. Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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

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

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in clusters of dead leaves on tree limbs. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cleared, the DOW recommends tree and/or tree limb clearing only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with a Diameter Breast Height (DBH)  $\geq 20''$  if possible. If trees are present within the project area, and trees and/or tree limbs must be cleared during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any clearing. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the [OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE \(OH-FIELD OFFICE\) JOINT GUIDANCE FOR BAT SURVEYS](#). If state-listed bats are documented, DOW recommends tree clearing only occur from October 1 through March 31. However, limited summer tree clearing may be acceptable after consultation with the DOW (contact Eileen Wyza at [Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)).

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

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

The project is within the range of the greater redhorse (*Moxostoma valenciennesi*), a state threatened fish. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

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

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

The project is within the range of the blue-spotted salamander (*Ambystoma laterale*), a state endangered species. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the 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. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges. 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 type of habitat will not be impacted, this project is not likely to impact this species.

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

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

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

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

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

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

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

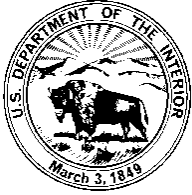
- New or increased consumptive use of water averaging 2 million gallons per day (mgd) within 30 days within the Ohio River basin.
- New or increased withdrawal and consumptive water use in the Lake Erie watershed averaging 1 million gallons per day (mgd) or more in 90 days.
- New or increased water withdrawal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

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

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

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

## 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



September 19, 2025

Project Code: 2025-0142812

Dear Mr. Lubbers:

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

Federally Threatened and Endangered Species: Due to the project type, size, location, and the proposed implementation of seasonal tree cutting (clearing of trees  $\geq 3$  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](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](mailto:mike.pettegrew@dnr.ohio.gov).

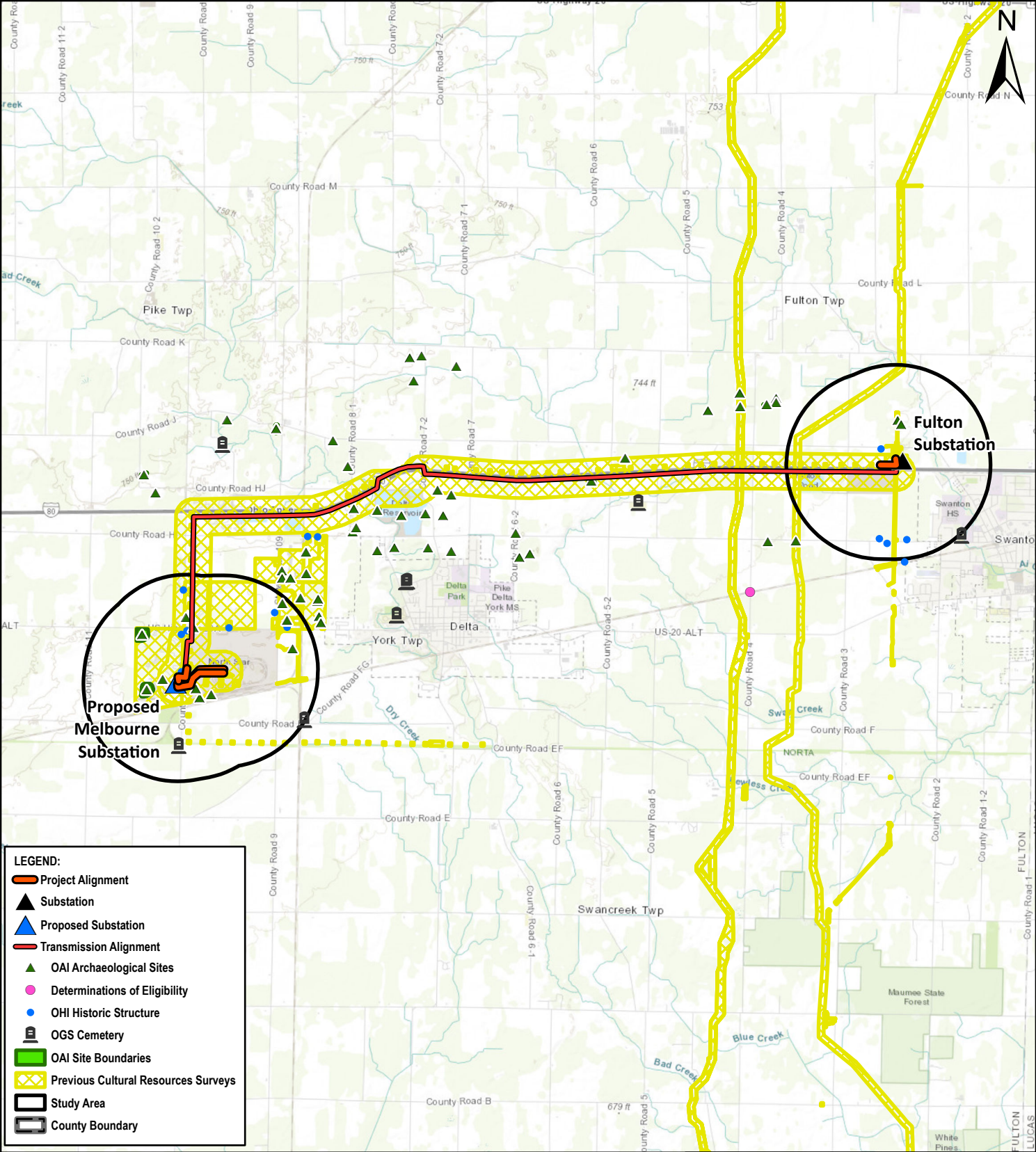
If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or [ohio@fws.gov](mailto:ohio@fws.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Knoll".

Erin Knoll  
Field Office Supervisor





Fulton-North Star Steel 345 kV and Melbourne-Sydney 345 kV  
Transmission Line Connections to Melbourne Substation Project  
Fulton County, Ohio

<b>Exhibit 6</b> <b>Cultural Resources Map</b>	
1 inch = 1.4 miles	<b>Jacobs</b>
Date: 10/6/2025	



April 4, 2023

In reply, please refer to:  
2023-FUL-57272

Jessica R. Wobig  
Jacobs Engineering Group, Inc.  
2 Crown Point Court, Suite 100  
Cincinnati, Ohio 45241

RE: Dowling-North Star 345 kV Transmission Line Project  
Fulton County, Ohio

Dear Ms. Wobig:

This letter is in response to correspondence received on March 7, 2023. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of Ohio's SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The proposed undertaking involves the construction of a new greenfield 345 kV transmission line approximately 9.5 miles in length and with an expected right-of-way (ROW) width of 150 feet. The following review and comments pertain only to the *Dowling-North Star 345 kV Transmission Line Project Draft Architectural and Historical Resources Report* by Jacobs Engineering Group, Inc. (Jacobs) (2023). The archaeological component has been submitted in a stand-alone report, therefore the review will be under a separate cover.

A literature review and field survey were completed as part of the investigations. A total of 16 resources fifty years of age or older were identified within the Area of Potential Effects. Jacobs recommends that none of the identified resources are eligible for listing in the National Register of Historic Places. Our office agrees with Jacobs' recommendations of eligibility.

Based on the information provided, it is our opinion that the project will have no effect on historic properties. No further coordination regarding architectural resources are warranted, unless the project changes. If you have any questions, please contact me at [jwilliams@ohiohistory.org](mailto:jwilliams@ohiohistory.org). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Joy Williams".

Joy Williams, Project Reviews Manager  
Resource Protection and Review

*"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."*

RPR Serial No: 1097246