

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

CONSTRUCTION NOTICE

**HARDING-LEROY CENTER S-6, GLENWILLOW-
INLAND S-5 345 KV TRANSMISSION LINES STRUCTURE
REPLACEMENT PROJECT
OPSB CASE NO.: 26-0016-EL-BNR**

March 16, 2026

**American Transmission Systems, Incorporated
341 White Pond Dr.
Akron, Ohio 44320**

OPSB CASE NO. 26-0016-EL-BNR
CONSTRUCTION NOTICE
HARDING-LEROY CENTER S-6, GLENWILLOW-INLAND S-5 345 KV
TRANSMISSION LINES STRUCTURE 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 (“Board”) as a Construction Notice. Pursuant to Adm.Code 4906-6-04, Applicant requests expedited, 21-day review of this application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name and Reference Number

Name of Project: Harding-Leroy Center S-6, Glenwillow-Inland S-5 345 kV
Transmission Lines Structure Replacement Project

Reference Number: 1045-1 and 1044-1

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to replace four (4) double circuit structures that currently support the existing Harding-Leroy Center S-6 and Glenwillow-Inland S-5 345 kV Transmission Lines. The proposed project was requested by the Ohio Department of Transportation to increase the height of the affected structures to accommodate a bridge replacement. Specifically, the project will require the replacement of existing structures 16056, 16057, 16058 and 16059. The structures will be replaced with new 345 kV tubular single steel monopole double circuit dead end structures. The existing conductors and shield wire will be transferred to the new structures except for the span between structures 16057 to 16058. New matching 2-bundled 954 kcmil (45/7) "towhee" ACSR and (2) 7#8 Alumoweld shield wire will be strung between structure 16057 and 16058.

The Project is located in the city of Garfield Heights, Cuyahoga County, Ohio. The general location of the Project is shown in **Exhibit 1**, a partial copy of the United States Geologic Survey, Cuyahoga County OH, Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery of the Project area. The general layout of the Project is attached as **Exhibit 3**.

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

The Project meets the requirements for a Construction Notice application because the Project is within the types of projects defined by Items (2)(a) and (5) 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 transmission line, or replacing structures with a different type of structure, for a distance of:

(a) Two miles or less:

(5) Replacement or relocation of an electric power transmission line and associated facilities where the project is required by publicly funded entities and is located on or adjacent to right-of-way or land owned by the public entity requiring the project.

The proposed Project is within the requirements of Item (2)(a) as it involves the replacement of structures with a different type of structure for a distance of less than 2 miles and Item (5) because the project is required by a publicly funded entity and is located on or adjacent to right-of-way or land owned by the public entity requiring the project.

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

The Project was requested by The Ohio Department of Transportation (“ODOT”). ODOT is replacing the Whitehouse Crossing (SR 14) Bridge over the Norfolk Southern Railroad in Garfield Heights, Cuyahoga County, Ohio (project PID 104132). The replacement of the bridge conflicts with the Harding-Leroy Center 345kV S-6 and Glenwillow-Inland 345kV S-5 transmission lines in their existing configuration and elevation. To allow for safe construction of the bridge and to maintain required clearances above the newly constructed bridge elevation, ATSI must replace structures 16057 and 16058 with taller structures to gain the additional height required. Due to the height increase of structures 16057 and 16058, the adjacent structures 16056 and 16059 will also need to be replaced. Due to the nature of the Project, advanced transmission technologies were not considered.

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. This map was submitted to the Public Utility Commission of Ohio (“PUCO”) in Case No. 25-0504-EL-FOR under Adm.Code 4901:5-5:04 (C)(2)(b). This project was not included in the 2025 Long Term Forecast Report because it was not identified at the time of filing. The Project was also not presented to PJM due to no topology or ratings change.

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

No alternatives were considered for this project because of the specific needs and schedule of ODOT.

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 copy of this Construction Notice, along with other Project information, on FirstEnergy’s website:

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

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

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

Construction on this Project is expected to begin as early as July 2026, and be completed by October 2026, at which time the Project will be placed in service.

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

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

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

The project is located within existing right-of-way (“ROW”) and will not require any easement modifications. Impacted parcels are shown in Table 1.

Table 1. Property List

Parcel Number	Easement Status
54629005	Existing
54601004	Existing
54601006	Existing
54421001	Existing

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

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

The transmission line construction will have the following characteristics:

Voltage:	138 kV
ROW Width:	100 ft
Conductors:	954 kcmil (45/7) "Towhee" ACSR
Static Wire:	7#8 Alumoweld
Insulators:	Porcelain
Structure Type:	Exhibit 4: 345 kV Double Circuit Tubular Steel Single Pole Deadend Structure

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

There are no occupied residences or institutions within 100 feet of the proposed transmission line. 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 \$ 6,800,000.00 and will be fully reimbursed by ODOT.

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

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

The Project is located in the city of Garfield Heights, Cuyahoga County, Ohio. The land use within the vicinity of the proposed Project is industrial use. This project will take place in existing ROW.

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

There are no parcels within the Project Area designated as Agricultural District property, therefore there will be no impact to any agricultural land.

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 for the project study area (Area of Potential Effects or APE) within a one (1)-mile search radius. On November 21, 2025, SHPO replied to the request and the response is attached as **Exhibit 5**. SHPO concurred that as proposed, the Project will have no effect on historic properties and no cultural resource studies are warranted. No further coordination is required for this Project unless the scope of work changes or archaeological remains are discovered during the course of the Project’s completion.

The SHPO database also includes listings on the Ohio Historic Inventory (“OHI”), the Ohio Archaeological Inventory (“OAI”), previous cultural resource surveys, and the Ohio Genealogical Society (“OGS”) cemetery inventory. The SHPO database includes a catalog of all historic properties listed in or eligible for listing in the National Register of Historic Places (“NRHP”), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The file review revealed there are two (2) NRHP-listed above-ground historic resources and an additional ten (10) OHC Determination of Eligibility (“DOE”) points recorded within one (1)-mi of the proposed Project. Of the two (2) NRHP-listed resource, one (1) has been recorded as being DELISTED; however, it currently remains mapped. The nearest of the resources, Garfield Park Bridge (OHI No.: CUY0187419), is located 0.14 mi south of the proposed Project and has been recommended eligible under Criteria A and C.

There are twenty (20) additional above-ground historic resources that have not yet been formally evaluated for NRHP eligibility recorded within one (1)-mi. The nearest of these is located 0.12 mi to the south. The majority of the unevaluated resources are located to the

north. There is one (1) OGS cemetery recorded 0.29 mi north of the proposed Study Area. One (1) above-ground historic resources survey, Historic and Archaeological Resources of the Urban County Block Grant Communities in Cuyahoga County (2006), has been completed in the area and includes the entire Study Area.

Three (3) archaeological surveys have been conducted within one (1)-mi of the proposed Project. One (1) survey borders the entire Study Area to the southeast. No archaeological sites have been recorded within one (1)-mi.

Per the SHPO concurrence, the Project as proposed will have no effect on archeological or historical properties and no further studies are required unless the scope of work changes or archaeological remains are discovered during the course of the Project.

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

Coordination with the Garfield Heights City Engineer will be completed to obtain ROW permits necessary for work along C.& P. Railroad and Norfolk & Western Railroad. Note, no construction permit is required for routine maintenance and new service orders that do not include excavation in a public street. If more than one (1) acre of earth disturbance is proposed in the Project scope, then submittal of a Notice of Intent (“NOI”) application to the Ohio EPA will be required for coverage under the general construction stormwater permit (OHC000006), and a Storm Water Pollution Prevention Plan (“SWPPP”) will be submitted to the Garfield Heights City Engineer and/or Stormwater Program Manager. The City of Garfield Heights may require a SWPPP for sites disturbing less than one (1) acre. Sediment controls shall be required on all construction sites as deemed necessary by the City based on upstream and downstream flows in and out of the site. Proposed structures within the 100-year floodplain will require coordination with the City of Garfield Heights Floodplain Administrator to confirm exemption as a major utility facility (over 100kV).

All permitting and/or coordination necessary to comply with local, state, and federal agencies with jurisdiction regarding this Project will be completed prior to the commencement of construction. A list of government agency requirements is provided in Table 2.

Table 2. List of Government Agency Requirements

Agency	Requirement
Ohio EPA	General National Pollutant Discharge Elimination System (NPDES) Construction Storm Water Permit OHC000006
Garfield Heights City Engineer and/or Stormwater Program Manager	SWPPP Review
Garfield Heights City Engineer’s Office	ROW Permit(s)
Ohio Department of Transportation	Construction Agreement

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

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 (“DOW”)’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 November 3, 2025, indicated that there are no records of state and/or federally listed plants or animals within a one (1) mile radius of the Project Study Area. However, the Project is within the range of ten (10) state and/or federally listed animal species. A copy of ODNR’s Office of Real Estate’s response is included as **Exhibit 6**.

In addition, the DOW stated 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. These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, and cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost trees. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed for ATSI and submitted to ODNR for concurrence on November 6, 2025. ODNR responded on November 7, 2025, attached as **Exhibit 7**, concurring that no caves, cliffs, or mine openings occur in the Project Study Area; therefore, the Project is not likely to impact hibernating bats. In assessing compliance with NWP General Condition 18, TRC determined that tree clearing is not anticipated within the Project Study Area. 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); therefore, no impacts to bat species are anticipated as a result of the construction of this Project.

The Project is within the range of the lake sturgeon (*Acipenser fulvescens*), a state endangered fish and a federal species of concern, the channel darter (*Percina copelandi*), a state threatened fish, and the bigmouth shiner (*Notropis dorsalis*), 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. Since no in-water work is proposed in a perennial stream, this Project will not impact these or other aquatic species.

The Project is within the range of the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant but can also be found in marshy meadows and roadside ditches. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project will not impact this species.

The Project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs, and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project will not 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 will not impact this species.

As part of the investigation, TRC submitted a Technical Assistance request to USFWS on October 2, 2025, to research the presence of any endangered, threatened, rare, or designated species within the Project Study Area. A copy of the USFWS' response, dated November 19, 2025, is included as **Exhibit 8**. The response indicated that due to the Project type, size, and location, they do not anticipate any effect to federally endangered, threatened, or proposed species or proposed or designated critical habitat. USFWS requests that if there are any Project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact them for an additional Project review.

A list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in Table 3.

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

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Mammals				
Indiana Bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Little Brown Bat	<i>Myotis lucifugus</i>	N/A	Endangered	Trees, forests, caves, and caverns.

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Endangered	Trees, forests, caves, and caverns.
Fish				
Bigmouth shiner	<i>Notropis dorsalis</i>	N/A	Threatened	Perennial streams.
Channel darter	<i>Percina copelandi</i>	N/A	Threatened	Perennial streams.
Lake sturgeon	<i>Acipenser fulvescens</i>	Species of Concern	Endangered	Large bodies of water with connections to much smaller streams for spawning.
Reptiles				
Blanding's turtle	<i>Emydoidea blandingii</i>	N/A	Threatened	Marshes, ponds, lakes, streams, wet meadows, and swampy forests.
Smooth greensnake	<i>Opheodrys vernalis</i>	N/A	Endangered	Prairies, marshy meadows, and roadside ditches.
Spotted turtle	<i>Clemmys guttata</i>	N/A	Threatened	Fens, bogs and marshes, wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches.

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

TRC performed field investigations to identify and delineate wetlands and waterbodies for the Project, as shown in **Exhibit 9**. The Project Study Area is 5.39 acres located in Garfield Heights, Cuyahoga County, Ohio. One (1) perennial stream was identified and delineated within the Project Study Area.

The Project Study Area consists of an existing, maintained utility ROW, road ROW, and railroad ROW, surrounded by industrial land use. TRC did not observe the presence of any of the ODNR or federally listed species during the field investigation due to the highly maintained nature of the utility and railroad ROW and surrounding industrial land use.

Therefore, no impacts are anticipated to any of the listed species detailed in the ODNR correspondence.

The Limits of Disturbance (LOD) will be completely within the Project Study Area and will predominantly include using the existing utility ROW for access to the existing structures. It is anticipated that due to the nature of the Project, no jurisdictional resources will be impacted by the Project.

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

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

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

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

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

This Construction Notice application is being provided concurrently with its docketing with the Board to the following officials in the City of Garfield Heights, Cuyahoga County, Ohio. A copy will also be provided to the Cuyahoga County Public Library Garfield Heights Branch for public review/reference.

Cuyahoga County

Chris Ronayne
Cuyahoga County Executive
cronayne@cuyahogacounty.gov
2079 East 9th Street, 8th floor
Cleveland, OH 44115

David Ray
Cuyahoga County Engineer
publicworks@cuyahogacounty.gov
2079 East Ninth St.
Cleveland, OH 44115

Dale Miller
Cuyahoga County Council District 2
dmiller@cuyahogacounty.gov
2079 East 9th Street, 8th floor
Cleveland, OH 44115

Cuyahoga SWCD
info@cuyahogawcd.org
3311 Perkins Ave #100,
Cleveland, OH 44114

Michael Chambers
Cuyahoga County Fiscal Officer
mchambers@cuyahogacounty.gov
226 Middle Avenue, 4th Floor
Elyria, Ohio 44035

Garfield Heights

Matthew Burke
Garfield Heights Mayor
mburke@garfieldhts.org
5407 Turney Road
Garfield Heights, Ohio 44125

Stacey Collier
Garfield Heights City Council Ward 1
scollier@garfieldhts.org
5407 Turney Road
Garfield Heights, Ohio 44125

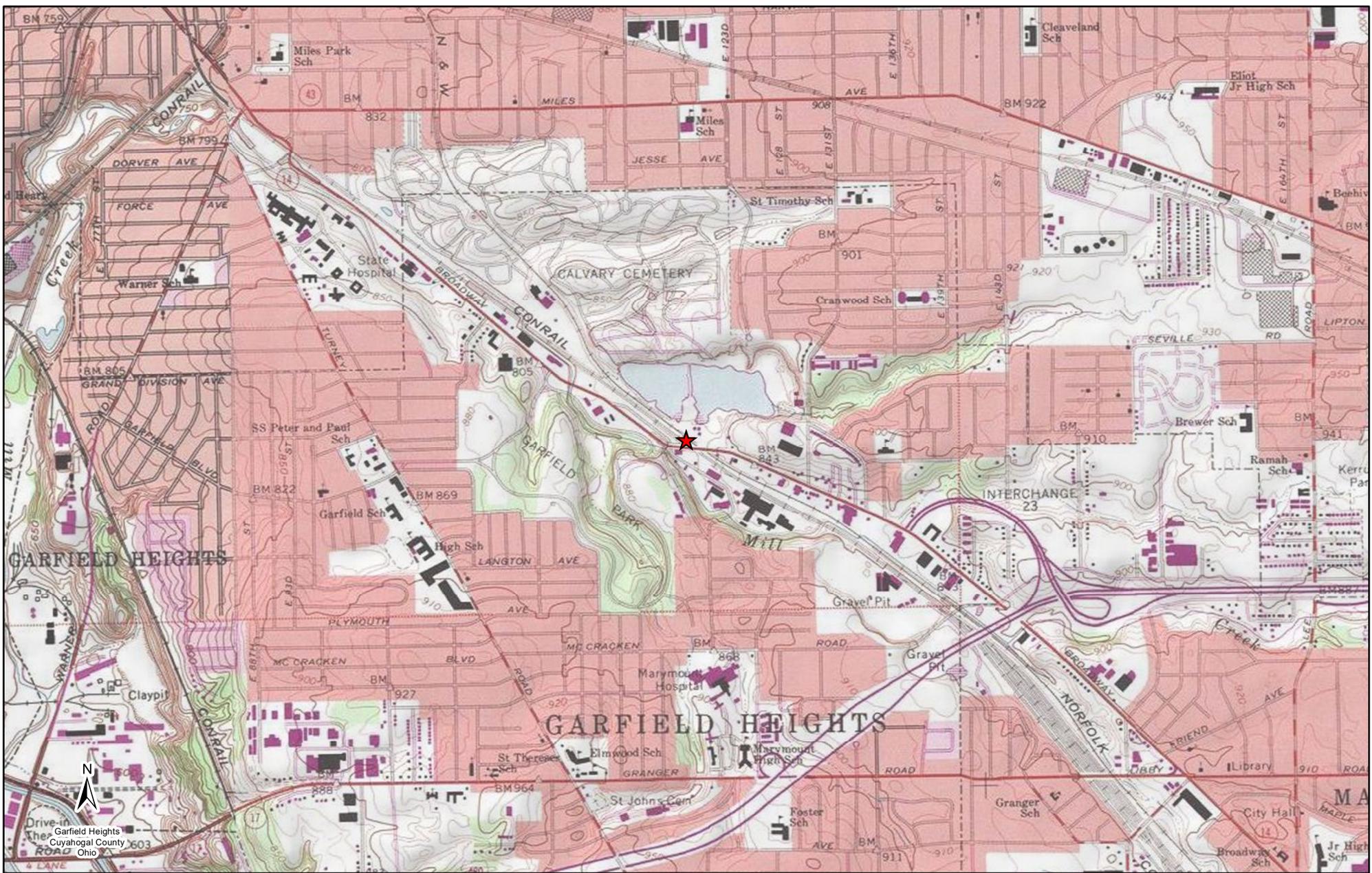
Barbara Biro
Garfield Heights Finance Director
bbiro@garfieldhts.org
6161 Engle Rd.
Brook Park, OH 44142

Library

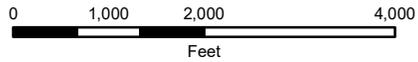
Anthony Furino, Branch Manager
Cuyahoga County Public Library, Garfield Heights Branch
5409 Turney Rd
Garfield Heights, OH 44125
afurino@cuyahogalibrary.org

Copies of the transmittal letters to these officials have been included with this application as proof of compliance under Adm.Code 4906-6-07 (B) to provide the Board with proof of notice to local officials as required by Adm.Code 4906-6-07 (A)(1) and to the library per Adm.Code 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 to meet the requirements of Adm.Code 4906-6-07 (B) and to provide the Board with proof of compliance with the notice requirements in Adm.Code 4906-6-07 (A)(3).



LEGEND:
 ★ Project Area



Reference:
 USGS Topographical Overlay

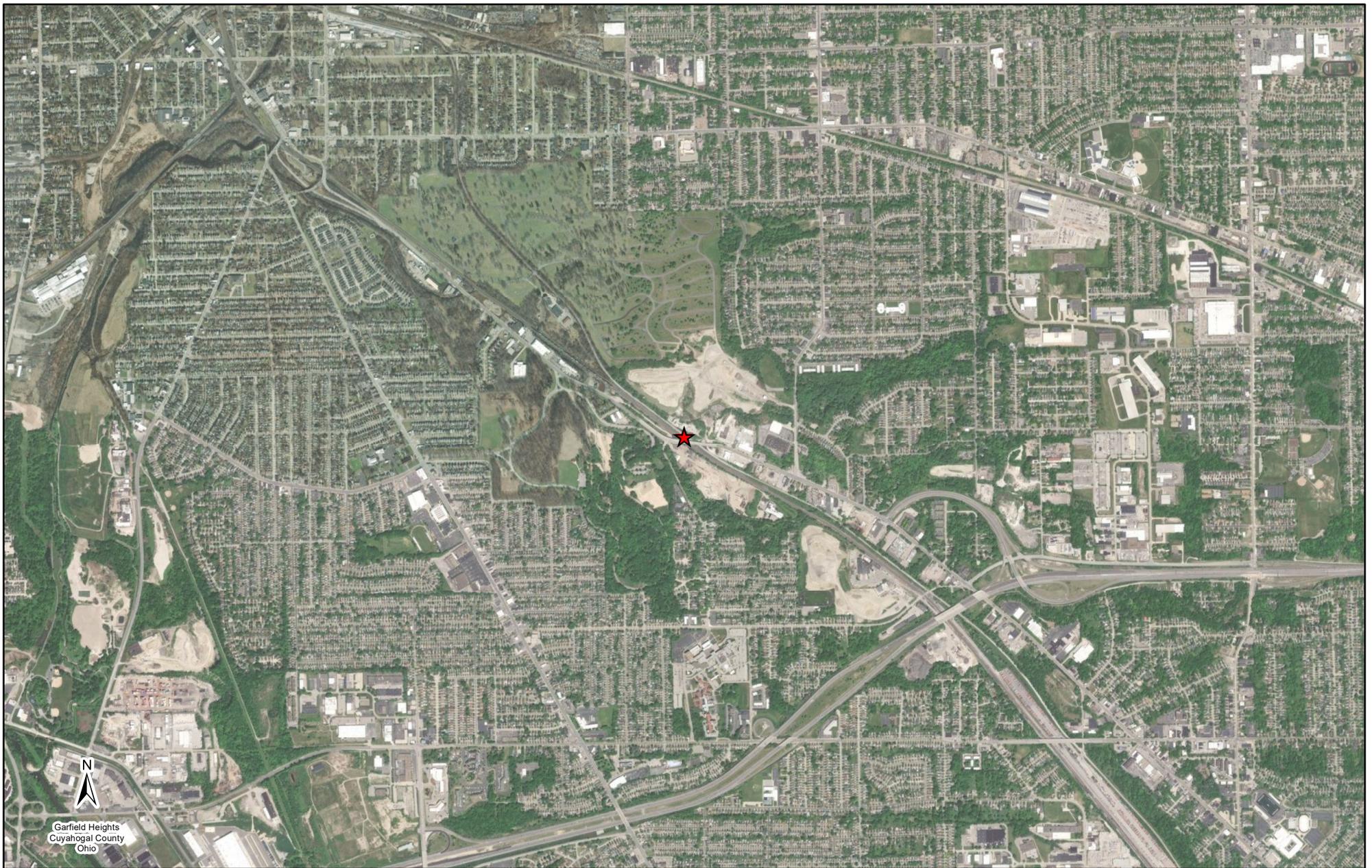
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 WKID: 3734 Authority: EPSG



EXHIBIT 1



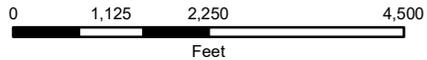
**HARDING-LEROY CENTER S-6, GLENWILLOW-INLAND
 S-5 345 KV TRANSMISSION LINES STRUCTURE
 REPLACEMENT PROJECT**



Garfield Heights
Cuyahoga County
Ohio

LEGEND:

★ Project Area



Reference:
USGS Topographical Overlay

Coordinate System:
NAD_1983_StatePlane_Ohio_North_FIPS_3401_Feet
WKID: 3734 Authority: EPSG

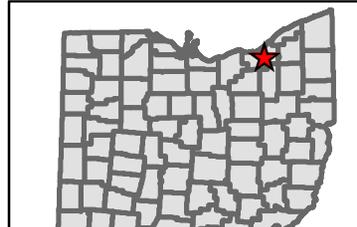
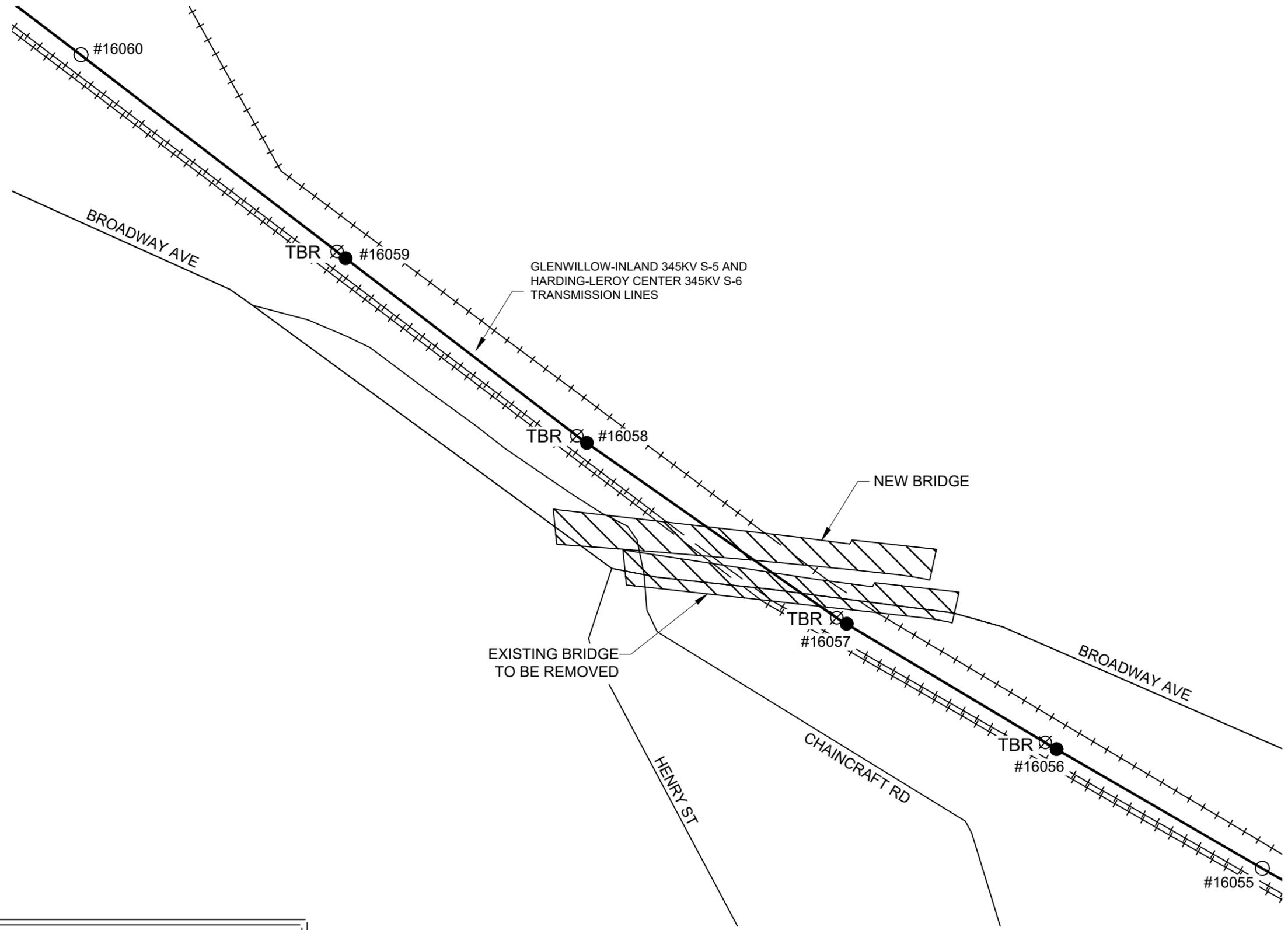


EXHIBIT 2



**HARDING-LEROY CENTER S-6, GLENWILLOW-INLAND
S-5 345 KV TRANSMISSION LINES STRUCTURE
REPLACEMENT PROJECT**

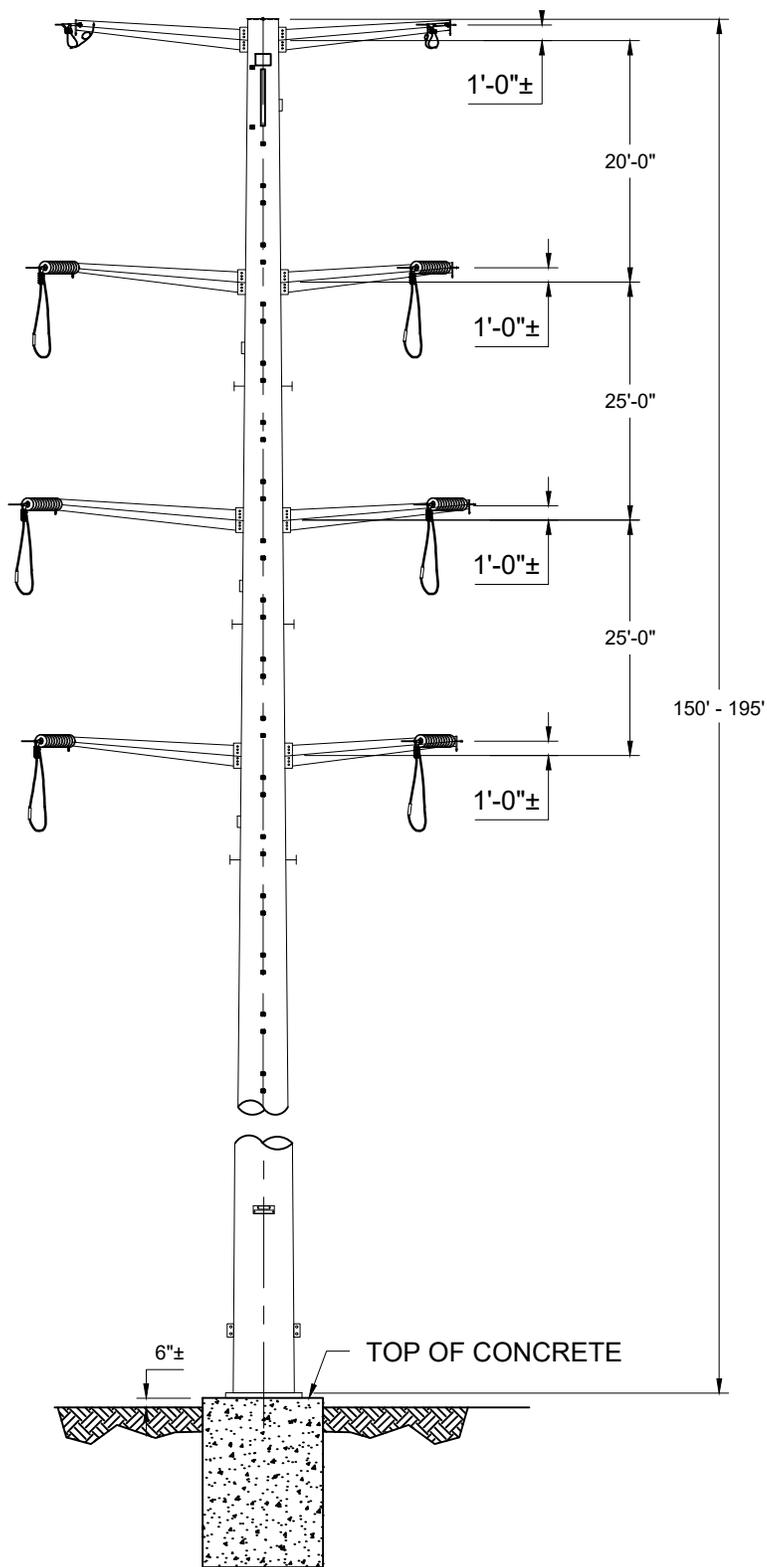


CUYAHOGA COUNTY,
STATE OF OHIO

LEGEND	
●	- NEW STRUCTURE
○	- EXISTING STRUCTURE TO REMAIN
⊗	- EXISTING STRUCTURE TO BE REMOVED
—	- CENTERLINE OF TRANSMISSION
+ + + + +	- RAILROAD
— ··· —	- WATER'S EDGE

	GLENWILLOW-INLAND 345KV S-5 AND HARDING-LEROY CENTER 345KV S-6 TRANSMISSION LINES STRUCTURE REPLACEMENT PROJECT
	GENERAL LAYOUT
	Exhibit 3

PAPER SIZE: 17X11



PAPER SIZE: 8.5X11

SCALE: NTS

ATSI

American Transmission Systems, Inc.
A subsidiary of FirstEnergy Corp.

GLENWILLOW-INLAND 345KV S-5 AND HARDING-LEROY CENTER 345KV
S-6 TRANSMISSION LINES STRUCTURE REPLACEMENT PROJECT

345KV DOUBLE CIRCUIT TUBULAR STEEL
SINGLE POLE DEADEND STRUCTURE

Exhibit 4



In reply refer to:
2025-CUY-66802

November 21, 2025

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

RE: Section 106 Review: Harding-Leroy Center Structure Replacement Project, Garfield Heights,
Cuyahoga County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on October 23, 2025, regarding the above-referenced project in Cuyahoga 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 consists of replacing four structures (16056, 16057, 16058, 16059) along the Harding-Leroy 345kV transmission line. Access to the structure locations will utilize the existing utility corridor. Three of the new structures will be higher than the existing ones but will not have a visual impact on cultural resources. Based on information submitted, 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. Therefore, based on this, it is the SHPO's opinion that no cultural resource studies are warranted for the project. Furthermore, as proposed, the project will have no effect on historic properties. 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 as required by 36 CFR § 800.13. If you have any questions concerning this review, please contact me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

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

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

RPR Serial No. 1111467



Office of Real Estate & Land Management

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

November 3, 2025

Jenna Slabe
TRC Companies, Inc.
1382 West 9th Street, Suite 400
Cleveland, Ohio 44113

Re: 25-1488_Harding-Leroy Center Structure Replacement

Project: The proposed project involves the replacement of structures to raise the span over Ohio Department of Transportation's Whitehouse Crossing Bridge on State Route 14.

Location: The proposed project is located in Garfield Heights, Cuyahoga 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 project is within the vicinity of records for the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species. Because presence of state endangered bat species has been established in the area, summer tree clearing is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree clearing

inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

In addition, 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 bat species 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. 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.

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 [OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE \(OH-FIELD OFFICE\) JOINT GUIDANCE FOR BAT SURVEYS](#). 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 lake sturgeon (*Acipenser fulvescens*), a state endangered fish and a federal species of concern, the channel darter (*Percina copelandi*), a state threatened fish, and the bigmouth shiner (*Notropis dorsalis*), 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.

The project is within the range of the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant but can also be found in marshy meadows and roadside ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the 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.

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

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

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

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

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

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

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

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

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

From: Eileen.Wyza@dnr.ohio.gov
To: [Slabe, Jenna](#)
Cc: [Falkinburg, Brad](#); [Molnar, Maggie](#); [Adolph, Kayla A](#)
Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Harding-Leroy Center Structure Replacement Project
Date: Friday, November 7, 2025 8:42:14 AM
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image001.png](#)

Exhibit 7

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

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

Hello Jenna,

Per review of the desktop survey provided for FirstEnergy's Harding-Leroy Center Structure 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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*This message is intended solely for the addressee(s). Should you receive this message by mistake, we would be grateful if you informed us that the message has been sent to you in error. In this case, we also ask that you delete this message and any attachments from your mailbox, and do not forward it or any part of it to anyone else. Thank you for your cooperation and understanding.
Please consider the environment before printing this email.*

From: Slabe, Jenna <JSlabe@trccompanies.com>
Sent: Thursday, November 6, 2025 4:01 PM
To: Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>
Cc: Falkinburg, Brad <BFalkinburg@trccompanies.com>; Molnar, Maggie <MMolnar@trccompanies.com>; Adolph, Kayla A <kaadolph@burnsmcd.com>
Subject: Desktop Hibernacula Assessment: FirstEnergy's Harding-Leroy Center Structure 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 Harding-Leroy Center Structure Replacement Project located in city of Garfield Heights, Cuyahoga 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, PWS
Ecologist



1382 W 9th St, Suite 400, Cleveland, OH 44113
C 330.998.0481 | JSlabe@trccompanies.com
TRCcompanies.com

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United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



November 19, 2025

Project Code: 2025-0156052

Dear Ms. Slabe:

The U.S. Fish and Wildlife Service (Service) 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 effects 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, and location, we do not anticipate any effect to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact us for additional project review.

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

Sincerely,

A handwritten signature in blue ink that reads "Erin Knoll".

Erin Knoll
Field Office Supervisor



1382 West Ninth St.
Suite 400
Cleveland, OH 44113

T 216.344.3072
TRCcompanies.com

October 13, 2025

Mr. Auggie Ruggiero
FirstEnergy Corporation
341 White Pond Drive
Akron, OH 44320

Reference: Technical Memorandum for the Surface Water Delineation of the Harding-Leroy Center Structure Replacement Project located in the City of Garfield Heights, Cuyahoga County, Ohio.
(TRC Project No. 664675 Phase 40)

Dear Mr. Ruggiero:

On behalf of FirstEnergy Corporation (FirstEnergy), TRC Environmental Corporation (TRC) conducted a surface water delineation for Harding-Leroy Center Structure Replacement Project (Project). The Project is in the city of Garfield Heights, Cuyahoga County, Ohio and the Study Area is 5.39 acres in size (**Attachment A, Figures 1 and 2**). The Project Study Area is located at the following approximate coordinates: 41.434722, -81.605946 (northwestern terminus) and 41.429666, -81.596789 (southeastern terminus). This Project involves the replacement of structures to raise the span over Ohio Department of Transportation's Whitehouse Crossing Bridge (SFN# 1801805) on State Route 14 (SR-14).

The delineation was conducted by qualified wetland scientists on October 3, 2025, in accordance with the United States Army Corps of Engineers (USACE) parameters. The objective was to evaluate and delineate potential surface water resources within the Project Study Area, such that the resources could be considered during each phase of the Project. Prior to the site visit, TRC reviewed available secondary source information such as the National Wetlands Inventory (NWI), National Hydrography Dataset (NHD), United States Geological Survey (USGS) topographic maps, County Soil Survey maps, and aerial imagery of the Project Study Area to use in addition to field investigations.

The Project Study Area is shown on the attached map (**Attachment A, Figure 1**), which was derived from the USGS Youngstown, Ohio 7.5-minute quadrangle topographic map. All soils mapped within the Project Study Area are non-hydric (**Attachment A, Figure 3**). The proposed Project Study Area does not include any mapped NHD or NWI features (**Attachment A, Figure 4**). According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel, 39035C0211E (eff. 12/3/2010), a minor portion of the proposed Project is located within a FEMA mapped 100-Year Flood Zone. During the field investigation, land use within the Project Study Area was observed to be existing, maintained utility right-of-way (ROW), road ROW, and railroad ROW, surrounded by industrial land use. See the attached mapping in **Attachment A** and the Photographic Record in **Attachment B** for additional Project Study Area details.

During the field investigation, one (1) perennial stream (S-EVN-1) was identified and delineated within the Project Study Area. No other ecological resources were observed within the Project Study Area. See **Table 1** on the following page for a summary of the observed resource. To verify the absence of wetlands within the Project Study Area, one (1) upland data point (UPL-EVN-1) was collected and is shown on **Figure 5** in **Attachment A**. Data was collected and recorded on the USACE Wetland Determination Data Sheet – Northcentral and Northeast Region and the Ohio Environmental Protection Agency (EPA) Headwater Habitat Evaluation Index (HHEI) data form. The USACE Wetland Determination Data Sheet and the Ohio EPA HHEI are provided in **Attachment C**.

Table 1. Stream

Stream ID	Resource Name ¹	Flow Regime	HHEI Score ²	Classification ³	Delineated Length within Project Study Area (Linear Feet)
S-EVN-1	UNT to Mill Creek	Perennial	37	Modified Class II PHW	16 ft

¹ UNT= Unnamed Tributary.

² HHEI is used for streams with drainage areas of less than 1.0 square mile and a maximum pool depth of less than 40 centimeters.

³ PHW= Primary Headwater.

This Technical Memorandum represents the conditions within the Project Study Area identified herein, as of the inspection dates. Should you require any additional information or have any questions concerning this letter, please feel free to contact me at (440) 666-2890 or by email at BFalkinburg@TRCCompanies.com.

Kind Regards,

TRC



Brad M. Falkinburg, PWS
Ecological Office Practice Leader

cc: Maggie Molnar, PWS – TRC Environmental Corporation

Attachments

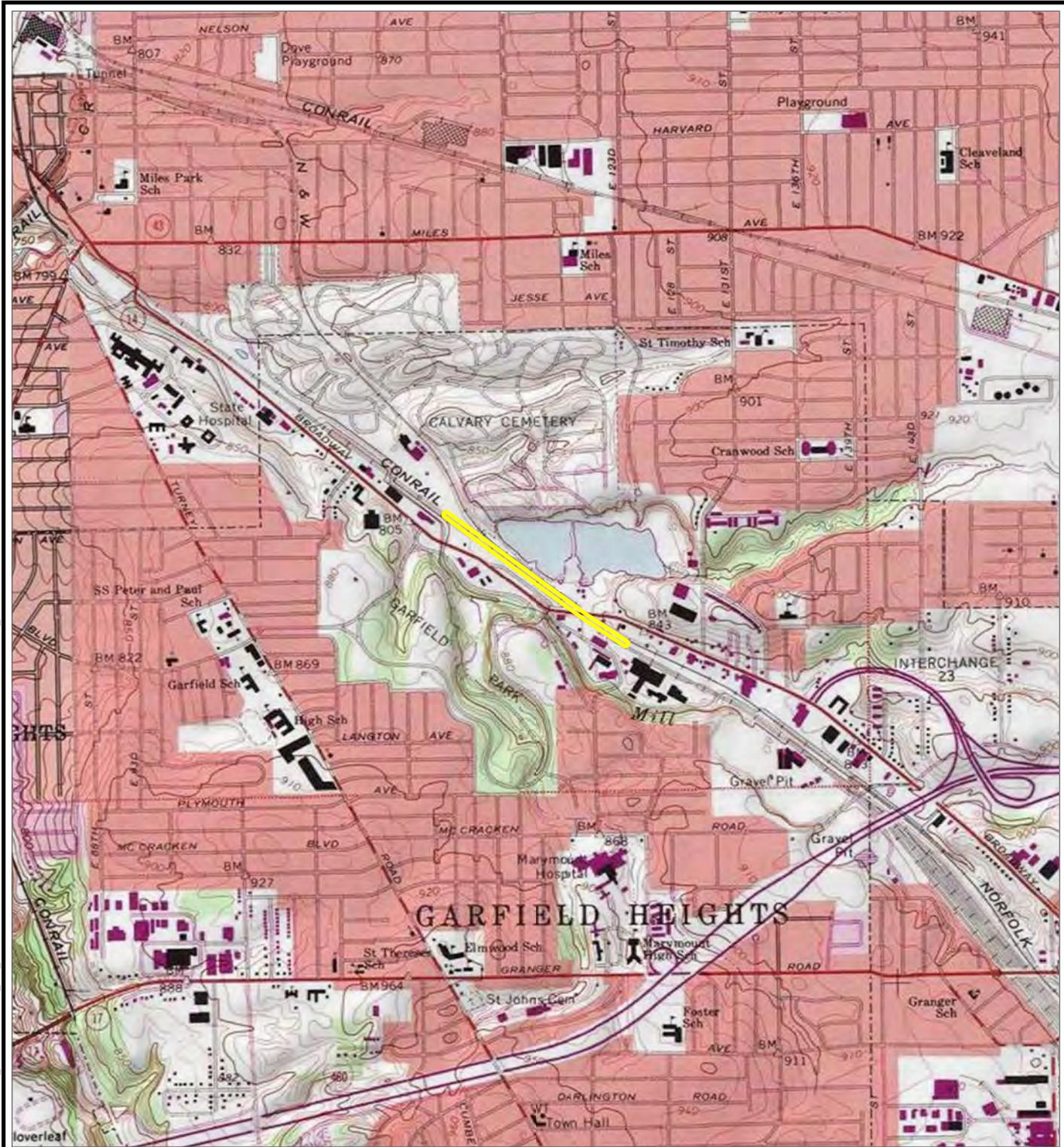
Attachment A: Figures

Attachment B: Photographic Record

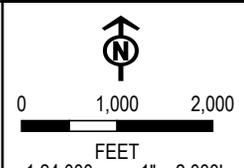
Attachment C: Data Sheets

ATTACHMENT A – Figures

COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH FIPS 3401 FEET; MAP ROTATION: 0
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 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, YOUNGSTOWN QUAD

PROJECT: **FIRSTENERGY - HARDING-LEROY CENTER
 STRUCTURE REPLACEMENT PROJECT
 CUYAHOGA COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL	PROJ. NO.: 664675 P40
CHECKED BY: M. MOLNAR	FIGURE 1
APPROVED BY: B. FALKINBURG	
DATE: SEPTEMBER 2025	



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

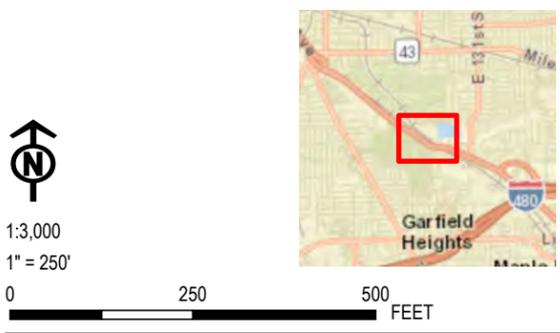
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- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



PROJECT: FIRSTENERGY - HARDING-LEROY CENTER STRUCTURE REPLACEMENT PROJECT CUYAHOGA COUNTY, OH	
TITLE: AERIAL MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P40
CHECKED BY: M. MOLNAR	FIGURE 2
APPROVED BY: B. FALKINBURG	
DATE: SEPTEMBER 2025	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx



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

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

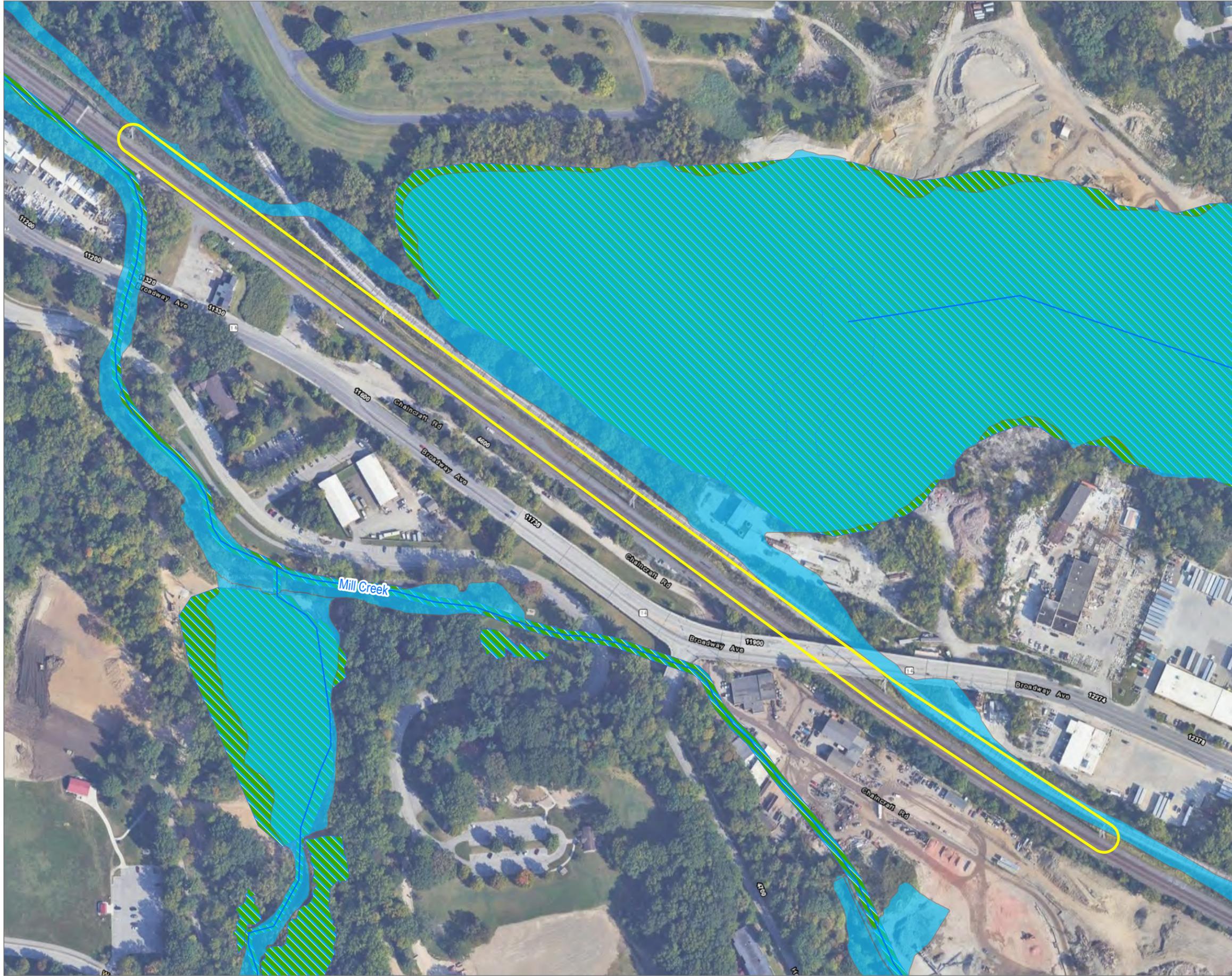


1:3,000
 1" = 250'



PROJECT: FIRSTENERGY - HARDING-LEROY CENTER STRUCTURE REPLACEMENT PROJECT CUYAHOGA COUNTY, OH	
TITLE: SOILS MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P40
CHECKED BY: M. MOLNAR	FIGURE 3
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2025	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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- PROJECT STUDY AREA
- NATIONAL HYDROGRAPHY DATASET (NHD) STREAM
- NATIONAL WETLANDS INVENTORY (NWI) FEATURE
- 100-YEAR FLOOD ZONE

BASE MAP: GOOGLE MAPS.
 DATA SOURCES: WETLAND DATA ACQUIRED FROM U.S. FISH & WILDLIFE SERVICE, NATIONAL WETLANDS INVENTORY (NWI); STREAM DATA ACQUIRED FROM USGS, NATIONAL HYDROGRAPHY DATASET (NHD); FLOOD DATA ACQUIRED FROM FEMA, NATIONAL FLOOD HAZARD LAYER (NFHL).



1:3,000
 1" = 250'



PROJECT: **FIRSTENERGY - HARDING-LEROY CENTER
 STRUCTURE REPLACEMENT PROJECT
 CUYAHOGA COUNTY, OH**

TITLE: **NHD, NWI AND FEMA FLOODPLAIN MAP**

DRAWN BY: M. OPEL	PROJ. NO.: 664675 P40
CHECKED BY: M. MOLNAR	FIGURE 4
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2025	

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

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0; Saved By: MOJEL on 10/09/2025 15:31:52 PM; File Path: T:\I-PROJ\EC\First_Energy\664675_040_HardingLeroyCenter\A-PRX\WDR.aprx; Layout Name: Fig04_Hydro

FILE: WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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- PROJECT STUDY AREA
- EXISTING STRUCTURE
- ▲ CULVERT
- PERENNIAL STREAM
- UPLAND DATA POINT

BASE MAP: GOOGLE MAPS.
 DATA SOURCES: TRC WETLAND DELINEATION COMPLETED OCTOBER 3, 2025.

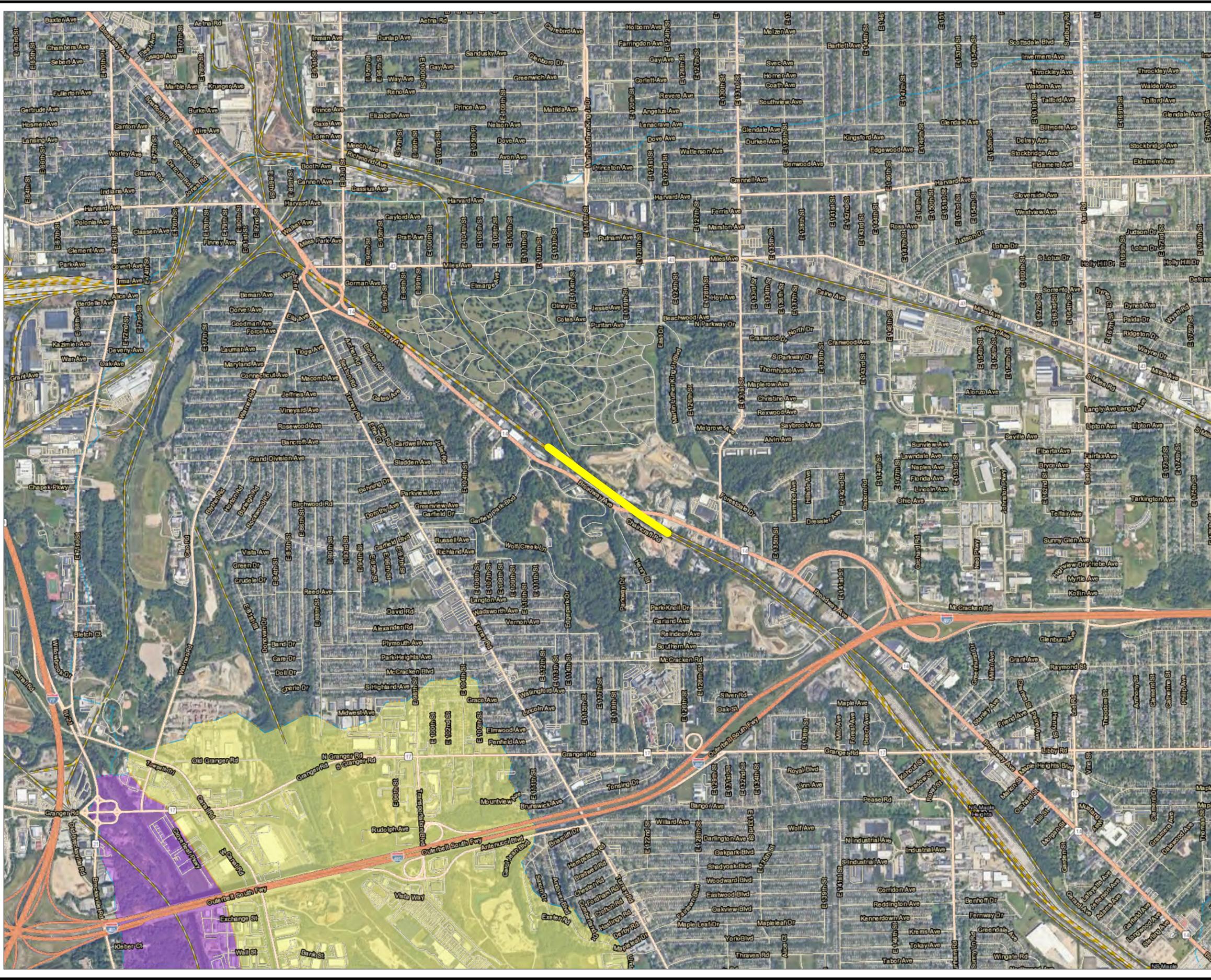


1:3,000
 1" = 250'



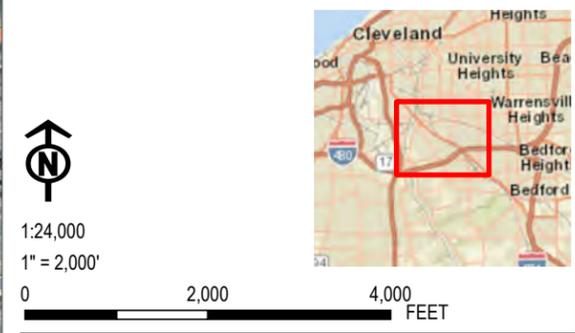
PROJECT: FIRSTENERGY - HARDING-LEROY CENTER STRUCTURE REPLACEMENT PROJECT CUYAHOGA COUNTY, OH	
TITLE: DELINEATED RESOURCES MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P40
CHECKED BY: M. MOLNAR	FIGURE 5
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2025	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
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- PROJECT STUDY AREA
- OHIO EPA 401 WATER QUALITY CERTIFICATION FOR NATIONWIDE PERMIT ELIGIBILITY
- INELIGIBLE
- POSSIBLY ELIGIBLE
- ELIGIBLE

BASE MAP: GOOGLE MAPS.
 DATA SOURCES: NATIONWIDE PERMITS STREAM DATA ACQUIRED FROM THE OHIO EPA.



PROJECT: FIRSTENERGY - HARDING-LEROY CENTER STRUCTURE REPLACEMENT PROJECT CUYAHOGA COUNTY, OH	
TITLE: NATIONWIDE PERMITS STREAM ELIGIBILITY MAP	
DRAWN BY: M. OPEL	PROJ. NO.: 664675 P40
CHECKED BY: M. MOLNAR	FIGURE 6
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2025	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx

ATTACHMENT B – Photographic Record

Client Name: FirstEnergy Corporation	Site Location: City of Garfield Heights, in Cuyahoga County, Ohio	Project No.: 664675 Phase 40
--	---	--

Photo No. 1.
Photo Date: 10/3/2025
Description: Photo of Stream S-EVN-1 (perennial) looking upstream, facing east.



Photo No. 2.
Photo Date: 10/3/2025
Description: Photo of Stream S-EVN-1 looking downstream, facing west.



Client Name: FirstEnergy Corporation	Site Location: City of Garfield Heights, in Cuyahoga County, Ohio	Project No.: 664675 Phase 40
--	---	--

Photo No. 3.

Photo Date:
10/3/2025

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



Photo No. 4.

Photo Date:
10/3/2025

Description:
Representative photo of the northern extent of the Project Study Area, facing north.



Client Name: FirstEnergy Corporation	Site Location: City of Garfield Heights, in Cuyahoga County, Ohio	Project No. 664675 Phase 40
--	---	---------------------------------------

Photo No. 5.

Photo Date:
 10/3/2025

Description:

Representative photo of the northern extent of the Project Study Area, facing east.



Photo No. 6.

Photo Date:
 10/3/2025

Description:

Representative photo of the northern extent of the Project Study Area, facing south.

