AMERICAN TRANSMISSION SYSTEMS, INCORPORATED
A FIRSTENERGY COMPANY

CONSTRUCTION NOTICE

LONGVIEW-ONTARIO 138 kV TRANSMISSION LINE SWITCH REPLACEMENT

OPSB CASE NO.: 23-0203-EL-BNR

May 5, 2023

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

CONSTRUCTION NOTICE
LONGVIEW-ONTARIO 138 kV TRANSMISSION LINE
SWITCH REPLACMENT PROJECT

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

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

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

Longview-Ontario 138 kV Transmission Line Switch Replacement Project ("Project")

(Reference Number: 3205-2).

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

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, proposes to replace two existing transmission line manual switches with two auto-sectionalizing switches on the Longview-Ontario 138 kV Transmission Line at the 138 kV transmission line tap to Cairns Substation.

The project is located in the City of Mansfield and Madison Township in Richland County, Ohio. The general location of the Project is shown in Exhibit 1, a partial copy of the United States Geologic Survey, Richland County, OH, Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery showing the Project area.

As shown on Exhibit 3, the following will be completed to accomplish the replacement of the existing switches:

- The two-way switch on existing structure #1924 will be removed and new dead-end hardware installed.

- Structure #1924A will be added as a single circuit, single-pole steel switch structure on a concrete foundation.

- Structure #1923 will be replaced with a single circuit, three-pole wood switch structure.

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 Item (2)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of OAC Rule 4906-1-01. This item states:

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

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

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

The Project is needed to reduce the exposure to outages and to decrease the time needed to restore the line to service by upgrading the transmission line switches on the Longview-Ontario 138 kV Transmission Line. The current switch configuration consists of manually operated air switches that need to be opened/closed in the field for any unplanned outage or maintenance event.

The Project proposes to replace the existing manual switches, A48 and A50, with motor-operated switches to allow installation of an auto-sectionalizing scheme. This will minimize the outages to the 129 customers served from the Cairns Substation and allow

automatic and prompt sectionalizing and restoration of the transmission line during both planned and unplanned outage events. This will improve operational flexibility and enhance reliability for existing and future customers served by the Longview-Ontario 138kV transmission line.

In 2022, the Longview-Ontario 138 kV Transmission Line experienced a sustained outage lasting over nine hours until repairs were completed and the transmission line restored to service. During that outage event, the customers at Cairns Substation experienced an extended outage of approximately one hour and 12 minutes before linemen could be dispatched to manually operate the switch in order to isolate the faulted transmission line section. Once switching was complete, system operators were able to restore service to Cairns Substation. Installing an auto-sectionalizing scheme as proposed under this Project will significantly limit the outages experienced by the customers served from Cairns Substation in the event of a similar outage event and will improve overall reliability.

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

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2023 Long-Term Forecast Report. This map was submitted to the Public Utilities Commission of Ohio ("PUCO") in Case No. 23-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. This map is incorporated by reference only. The general location of the Project area is shown in Exhibits 1 and 2. The general layout is shown in Exhibit 3.

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

ATSI considered the alternative of replacing the manual switches with motor-operated switches and SCADA control only. This would allow the system operators to remotely sectionalize the transmission system during an outage event, but would still require additional time for the system operator to troubleshoot and determine which switch could be closed to restore service to the customers. While this would be an improvement over

the existing manual switches, it is not the preferred course of action because it still requires manual intervention from the system operator to determine the location of the fault and take appropriate action to sectionalize the transmission line in order to restore service to the customers.

If no action is taken, ATSI will not be able to remotely sectionalize the Longview-Ontario 138 kV line and tap to the Cairns Substation during an outage event. Manual switching reduces reliability and increases outage durations experienced by the customers served from Cairns Substation. This is not the preferred course of action because manually operated switches require a transmission line crew to be dispatched to the location in order to operate the switches, which constrains ATSI's ability to perform critical switching expediently.

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

ATSI's manager of External Affairs will advise local officials of the features and the status of the proposed Project, as necessary. ATSI has also established a Project website, through which a copy of this Construction Notice application can be accessed: https://www.firstenergycorp.com/about/transmission_projects/ohio.html. During all phases of this Project, the public may ask questions, submit comments or contact ATSI through the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com.

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

Construction on this Project is expected to begin on August 7, 2023, and be completed in October 2023.

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

Exhibit 1 and 2 depict the general location of the Project. Exhibit 1 provides a partial copy of the United States Geologic Survey, Richland County, OH, Quad Map. Exhibit 2 is a copy of ESRI aerial imagery of the Project area.

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

The Project is located wholly within ATSI's existing right-of-way. No new easements will be required for the completion of this Project. Table 1 contains a list of properties impacted by the Project.

Table 1: Property Owner List

Parcel Number	Easement Status
0250902818000	Existing
0289003701002	Existing
0289003617001	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
Conductors:	477.0 kcmil Type 23 ACSS/TW (Longview-Ontario Main Line) & 336.4 kcmil 26/7 ACSR (Cairns Tap Line)
Static Wire:	(1) 101.8 kcmil 12/7 ACSR and (1) ALCOA 24/48 MM2/504-12 OPGW (Longview-Ontario Main Line) & (2) 7#8 Alumoweld (Cairns Tap Line)
Insulators:	Porcelain (switch structures 1923 and 1924A), Polymer (existing Tap structure #1924)
ROW Width:	100'
Structure Types:	Exhibit 4: 138 kV Three Pole Wood Switch Structure (Str. 1923)
	Exhibit 5: 138kV Single Pole Steel Switch Structure (Str. 1924A)

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

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

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

The estimated capital cost for the proposed project is approximately $1,386,277.

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

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

A list of all agricultural land and acreage including agricultural district land is provided below in Table 2. The project does not impair agricultural land use.

Table 2: Agricultural Land List

Parcel Number	Acreage	Easement Status	Agricultural District (Yes/No)	Agricultural District Expiration Year
0250902818000	70.0	Existing	Yes	2026

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

As part of the investigation for this Construction Notice, ATSI performed a desktop review of the Ohio Historic Preservation Office ("OHPO") online database on February 28, 2023, to identify the existence of any significant archeological or cultural resource sites within 0.5 miles of the Project Area. A map of the results of the search is shown in Exhibit 6.

The OHPO database includes all Ohio listings on the National Register of Historic Places ("NRHP"), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The results of

the search indicate that no listed NRHP sites and no NRHP Districts were identified within the Area of Potential Effect ("APE").

The OHPO database also includes listings on the Ohio Archaeological Inventory ("OAI"), the Ohio Historic Inventory ("OHI"), previous cultural resource surveys, and the Ohio Genealogical Society ("OGS") cemetery inventory. The results of the search indicate that there are no OAI archaeological resources or structures previously inventoried within the APE. Two (2) previous cultural resource surveys were conducted within 0.5 miles of the Project Area and are identified in Table 2. No OAI, OHI, or cemetery sites are in the disturbance area of the Project.

Table 2. List of Previous Cultural & Historic Resource Survey

Year	Name	County
2014	Phase I Archaeological Survey of the Ontario to Longview Segment of the Galion-Longview 138kV Reconducting Project, Springfield and Madison Townships, Richland County, Ohio	Richland
2021	Summary of Phase I Cultural Resource Investigations for the Viasat Satellite Earth Station Project, City of Mansfield, Richland County, Ohio	Richland

Because no archaeological or cultural resources were identified in search results, the proposed Project is not expected to have any adverse effects on any archaeological or cultural resources.

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

Table 5.

Governmental Agency	Documents
Ohio Environmental Protection Agency (OEPA)	General NPDES Construction Storm Water Permit OHC000006

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

On September 9, 2021, AECOM, ATSI's consultant for this Project, sent a request to the Ohio Department of Natural Resources ("ODNR") Office of Real Estate to conduct an Environmental Review. As part of that Environmental Review, the ODNR Office of Real Estate searched the ODNR Division of Wildlife's Natural Heritage Database in order to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project Area. The ODNR's Office of Real Estate's response, dated October 8, 2021, indicates that there is one (1) state endangered species, the upland sandpiper (*Bartramia longicauda)*, located within one mile of this Project. The response also noted that this Project is within the range of twelve state and/or federally listed endangered species. A copy of ODNR's Office of Real Estate's response is included as Exhibit 7.

In addition, AECOM, submitted a request to the US Fish and Wildlife Service ("USFWS") for an Ecological Review to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project Area. A copy of USFWS's Ecological Review response, dated September 20, 2023, is included as Exhibit 8. The response indicated that the Project is within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the federally threatened and state-endangered northern long-eared bat (*Myotis septentrionalis*). A list of all endangered, threatened, and rare species, as identified by ODNR and USFWS, within the range of the Project is provided in Table 6.

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

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Indiana bat	*Myotis sodalis*	Endangered	Endangered	Trees & Forest
Northern long-eared bat	*Myotis septentrionalis*	Endangered*	Endangered	Trees & Forest
Little brown bat	*Myotis lucifugus*	N/A	Endangered	Trees & Forest
Tricolored bat	*Perimyotis subflavus*	N/A	Endangered	Trees & Forest

Upland Sandpiper	*Bartramia longicauda*	N/A	Endangered	Grasslands & Pastures
Iowa darter	*Etheostoma exile*	N/A	Endangered	Streams & Rivers
Greater redhorse	*Moxostoma valenciennesi*	N/A	Threatened	Streams & Rivers
Eastern hellbender	*Cryptobranchus alleganiensis*	N/A	Endangered	Streams & Rivers
Eastern massasauga	*Sistrurus catenatus*	N/A	Threatened	Wetlands, Fens, & Prairies
Least bittern	*Ixobrychus exilis*	N/A	Threatened	Wetlands & Marshes,
Sandhill crane	*Grus canadensis*	N/A	Threatened	Wetlands, Marshes, & Ponds
Trumpeter swan	*Cygnus buccinator*	N/A	Threatened	Marshes & Lakes

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

The response from ODNR indicated that the Project is within the range of the state endangered upland sandpiper (*Bartramia longicauda*). This species prefers dry grasslands, pasture, and hayfields. Due to the maintained ROW and the type of work proposed, this Project is not likely to impact this species.

Minor tree clearing is anticipated for this proposed Project, to allow for permanent access and will take place between the recommended seasonal clearing timeframe of October 1 through March 31 to avoid potential impacts to listed bat species as per the recommendations of the ODNR and USFWS. Therefore, no impacts to these species are anticipated.

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

The USFWS comments did not identify any areas of ecological concern. AECOM conducted a wetland and stream assessment of the Project area. On October 19, 2021, June 8, 2022, and February 13, 2023, AECOM investigated the structure locations and

construction access areas for this Project. No wetlands or streams were identified. Therefore, no impacts are anticipated to the listed reptiles, fish, or birds.

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 Construction Notice is being sent concurrently with docketing to the following officials for the City of Mansfield, Madison Township, and Richland County. A copy will also be provided to the library for public review/reference.

Richland County

Mr. Darrell Banks
Richland County Commissioner
50 Park Ave. East
Mansfield, OH 44902

Mr. Cliff Mears
Richland County Commissioner
50 Park Ave. East
Mansfield, OH 44902

Mr. Tony Vero
Richland County Commissioner
50 Park Ave. East
Mansfield, OH 44902

Ms. Jotika Shetty
Executive Director
Richland County Regional Planning
19 North Main Street
Mansfield, OH 44902

Mr. Adam Gove, P.E.P.S.
Richland County Engineer
77 North Mulberry Street
Mansfield, OH 44902

Ms. Erica Thomas, Director
Soil and Water Conservation District
1495 W. Longview Ave., Suite 205B
Mansfield, OH 4490

City of Mansfield

Mayor Tim Theaker
City of Mansfield
30 North Diamond St.
Mansfield, OH 44902

Ms. Adrian Ackerman
Mansfield City Permitting & Development
30 North Diamond St.
Mansfield, OH 44902

Mr. Aurelio Diaz
Mansfield City Council, Ward 5
30 North Diamond St.
Mansfield, OH 44902

Mr. Robert Bianchi
City of Mansfield Engineer
30 North Diamond St.
Mansfield, OH 44902

Madison Township

Mr. Tom Craft
Madison Township Trustee.
P.O. Box 2206
Mansfield, OH 44905

Madison Township Trustee
P.O. Box 2206
Mansfield, OH 44905

Mr. Jim Houser
Madison Township Trustee
P.O. Box 2206
Mansfield, OH 44905

Ms. Leanna Rhodes
Madison Township Fiscal Officer
P.O. Box 2206
Mansfield, OH 44905

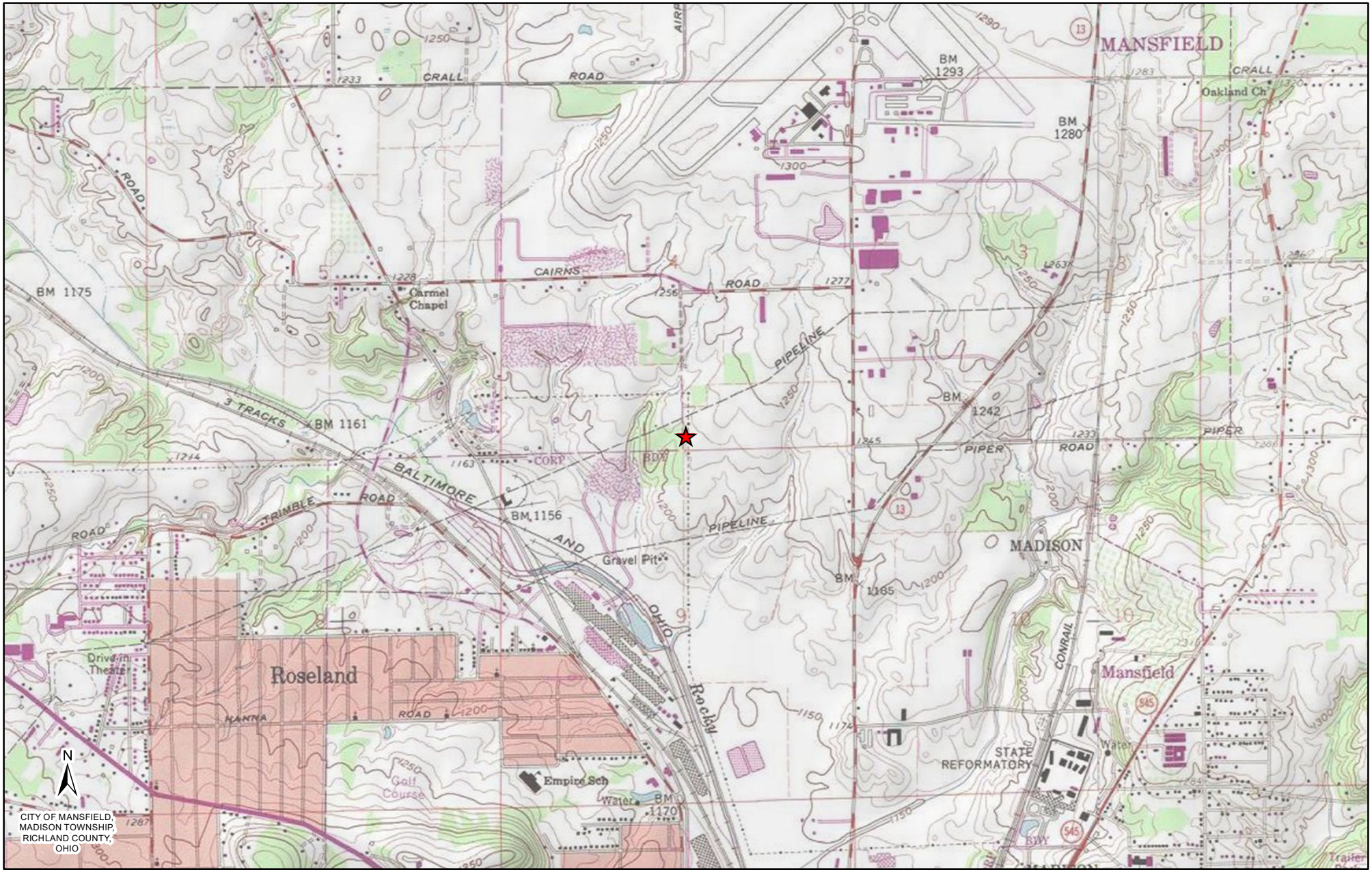
Ms. Catherine Swank

Library

Mr. Chris May
Library Branch Manager
Mansfield Richland County Public Library
43 West Third Street
Mansfield, OH 44902

Per OAC Rule 4906-6-07(B), an exemplar copy 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 OAC Rules 4906-6-07(A)(1) and 4906-6-07(A)(2).

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



LEGEND:

★ Project Location

0 1,000 2,000 4,000

Feet

Reference:
USGS Topographical Overlay

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

EXHIBIT 1

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

Longview-Ontario 138 kV Transmission Line Switch Replacement Project

LEGEND:

★ Project Location

— Roads

0 1,000 2,000 4,000

Feet

Reference:
ESRI Aerial Imagery; ODOT

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

EXHIBIT 2

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

Longview-Ontario 138 kV Transmission Line
Switch Replacement Project

LEGEND

- PROPOSED TRANSMISSION STRUCTURE
- EXISTING TRANSMISSION STRUCTURE TO REMAIN
- EXISTING TRANSMISSION STRUCTURE TO BE REMOVED
- EXISTING TRANSMISSION STRUCTURE TO BE MODIFIED
- PROPOSED SWITCH
- EXISTING TRANSMISSION LINE TO REMAIN
- FENCE
- ROADWAY
- UNPAVED ROADWAY
- PROPERTY LINE

0' 300' 600'
HORIZONTAL SCALE IN FEET
1":300'

CITY OF MANSFIELD
RICHLAND COUNTY
STATE OF OHIO

ONTARIO SUBSTATION

#1928 #1927 #1926 #1925 #1924A #1924 #12340 #12341 #12342

NEW SINGLE CIRCUIT SWITCH STRUCTURE #1924A SWITCH #A-617

REMOVE EXISTING TWO WAY SWITCH TRANSFER TAP CONDUCTOR TO NEW POLE BANDS

CAIRNS SUBSTATION

MCCARRICK PKWY

SAWYER PKWY

LONGVIEW SUBSTATION

NEW SINGLE CIRCUIT SWITCH STRUCTURE #1923 SWITCH #A-616

#1923

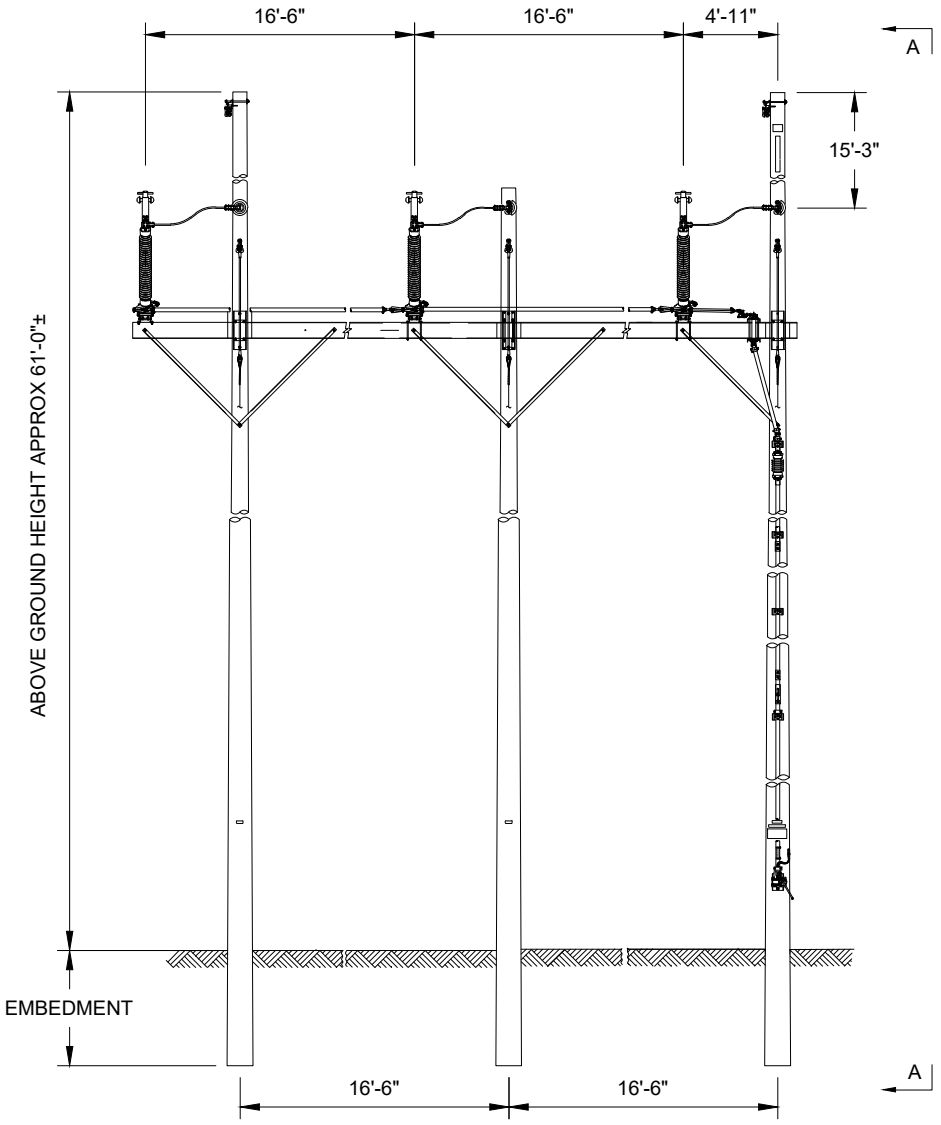
LONGVIEW-ONTARIO 138KV INSTALL AUTOSECTIONALIZING SWITCHES AT CAIRNS TAP PROJECT EX 3

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

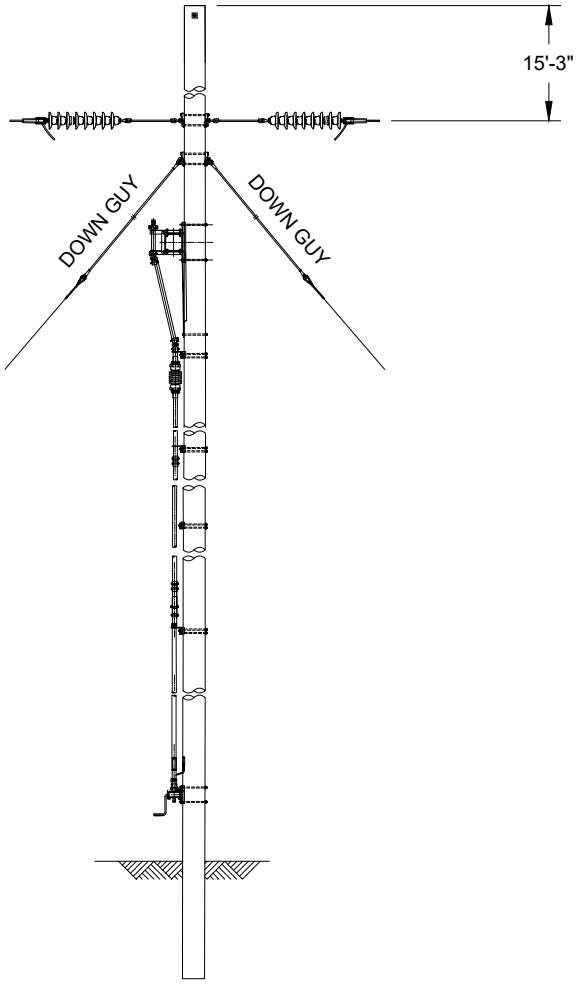
LONGVIEW-ONTARIO 138KV
INSTALL AUTOSECTIONALIZING SWITCHES
AT CAIRNS TAP PROJECT

LINE GENERAL LAYOUT

EXHIBIT 3



ELEVATION



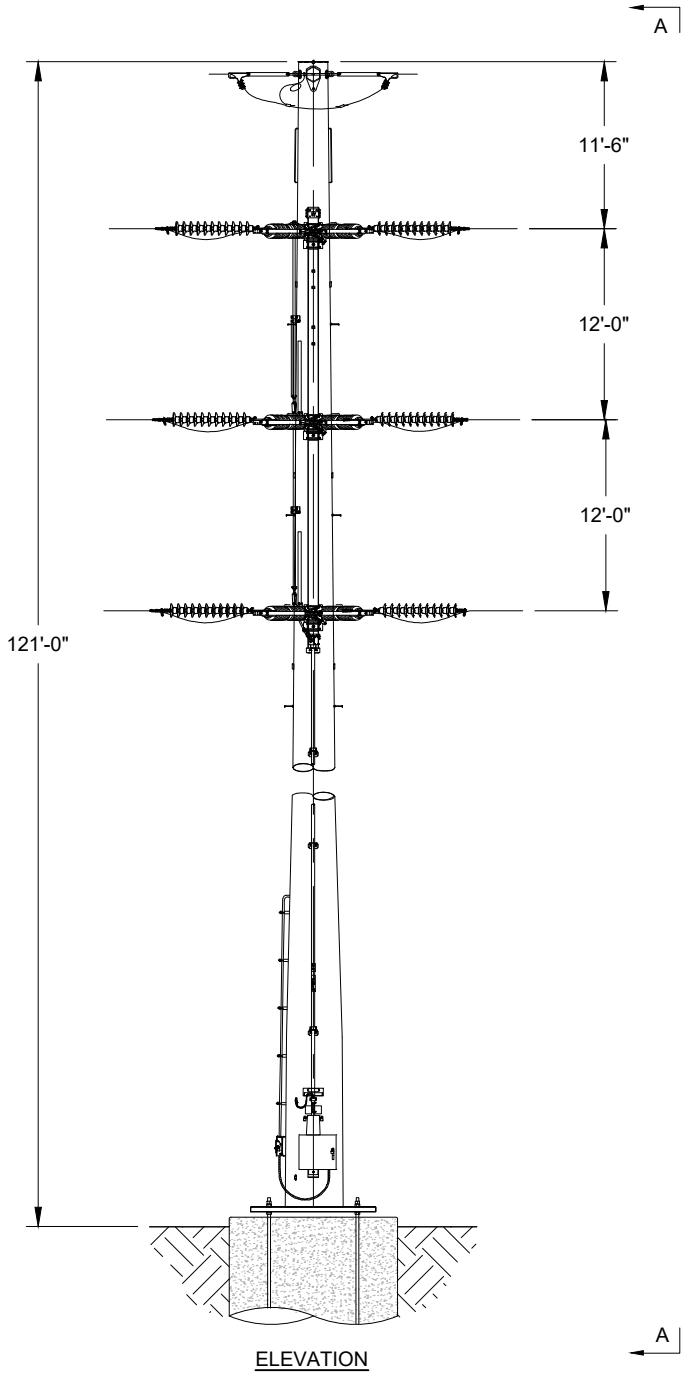
SECTION A-A

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

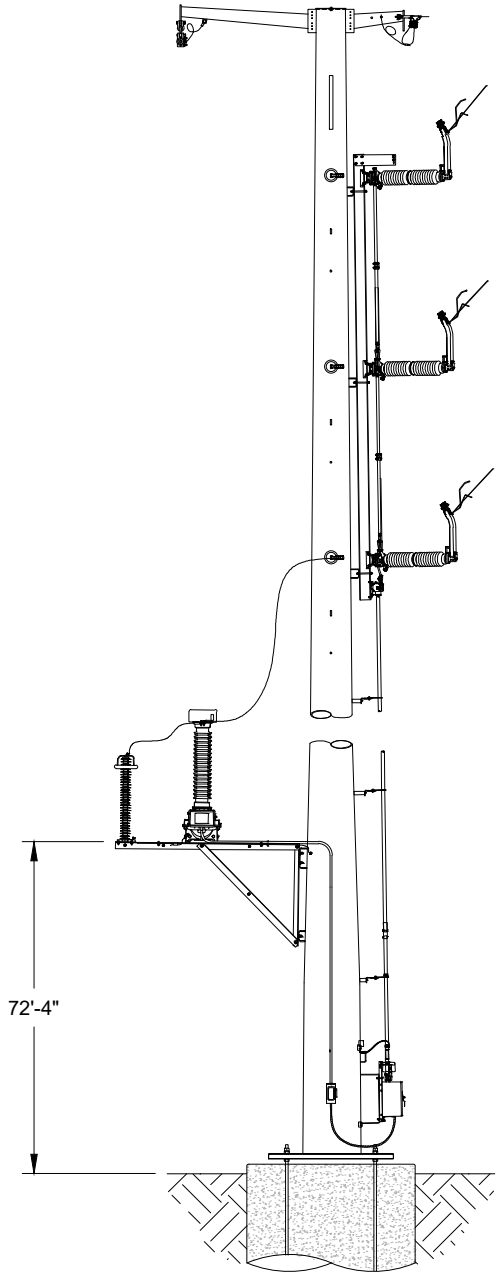
LONGVIEW-ONTARIO 138 KV
INSTALL AUTOSECTIONALIZING SWITCHES AT
CAIRNS TAP PROJECT

138KV THREE POLE WOOD SWITCH STRUCTURE

EXHIBIT 4



ELEVATION



SECTION A-A

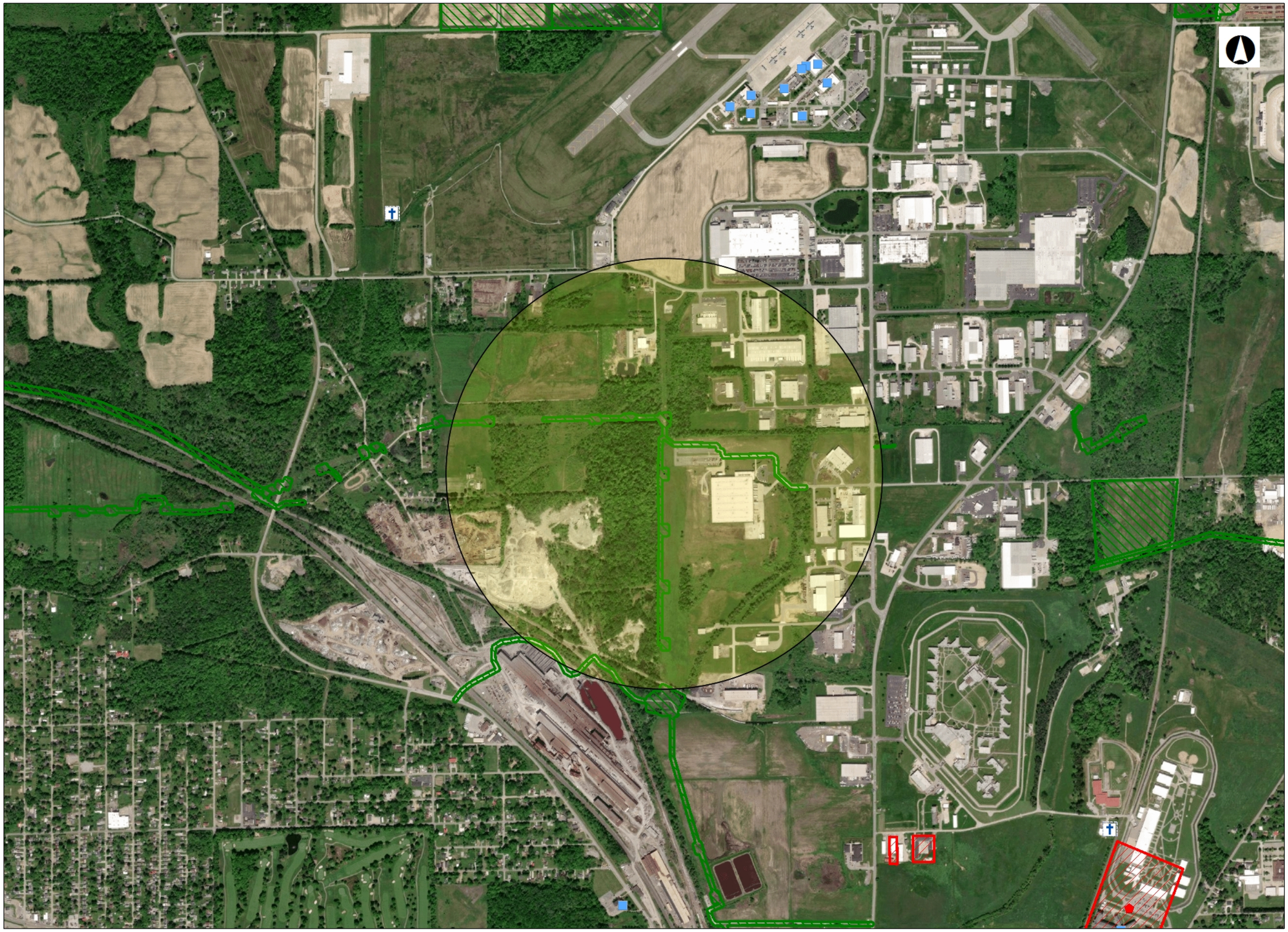
ATSI®
American Transmission Systems, Inc
a subsidiary of FirstEnergy Corp.

LONGVIEW-ONTARIO 138 KV
INSTALL AUTOSECTIONALIZING SWITCHES
AT CAIRNS TAP PROJECT

138KV SINGLE POLE STEEL SWITCH STRUCTURE

EXHIBIT 5

LONGVIEW-ONTARIO 138KV INSTALL AUTOSECTIONALIZING SWITCHES AT CAIRNS TAP PROJECT EX 5



State Historic Preservation Office

Legend

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

0 0.23 0.5 Miles

1: 18,056

Copyright/Disclaimer

EXHIBIT 6

Datum:	[Datum]
Projection:	WGS_1984_Web_Mercator_Auxiliary_Sphere

EXHIBIT 7

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR MARY MERTZ, DIRECTOR

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

October 8, 2021

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

Re: 21-0834; ATSI - Longview-Ontario 138kV Switch Replacement Project

Project: The proposed project involves replacement of two existing structures (1923 and 1925) with new steel structures as well as adding a new switch to the existing Structure 1924.

Location: The proposed project is located in the City of Mansfield and Madison Township, Richland 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 at or within a one mile radius of the project area:

Upland sandpiper (*Bartramia longicauda*), E

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

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

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

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

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

The project is within the vicinity of records for the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. Because presence of state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree cutting inside this buffer may be acceptable after further consultation with DOW (contact Erin Hazelton at Erin.hazelton@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 threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH $\geq$ 20 if possible.

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

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

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. 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 least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. 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 sandhill crane (*Grus 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.

The project is within the range of the trumpeter swan (*Cygnus buccinator*), a state threatened bird. Trumpeter swans prefer large marshes and lakes ranging in size from 40 to 150 acres. They like shallow wetlands one to three feet deep with a diverse mix of plenty of emergent and submergent vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through June 15. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). 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 type of habitat will not be impacted, this project is not likely to impact this species.

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

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

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

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

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

Mike Pettegrew
Environmental Services Administrator (Acting)

EXHIBIT 8

Miller, Brian

From: Ohio, FW3 <ohio@fws.gov>
Sent: Monday, September 20, 2021 3:55 PM
To: Miller, Brian
Cc: Foster, Eric R
Subject: [EXTERNAL] AECOM Longview-Ontario 138kV Switch Replacement Project Richland County, Ohio

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

TAILS# 03E15000-2021-TA-2344

Dear Mr. Miller,

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

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

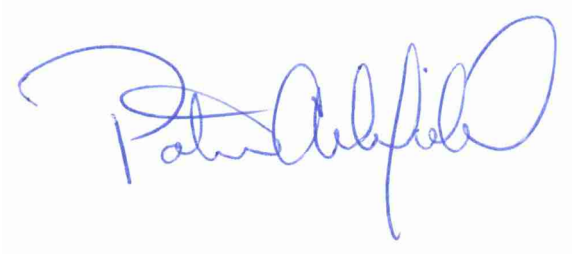
Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action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

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

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

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

Sincerely,



Patrice M. Ashfield
Field Office Supervisor