

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

CONSTRUCTION NOTICE

**ALLEN JUNCTION-WESTGATE 138 kV
TRANSMISSION LINE RELOCATION PROJECT**

OPSB CASE NO.: 21-1227-EL-BNR

December 22, 2021

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

CONSTRUCTION NOTICE
ALLEN JUNCTION-WESTGATE 138 kV
TRANSMISSION LINE RELOCATION 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 (“OPSB”) as a Construction Notice application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

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

Name of Project: Allen Junction-Westgate 138 kV Transmission Line Relocation Project (“Project”) (Line Code 3003).

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to relocate a portion of the existing Allen Junction-Westgate 138 kV Transmission Line to accommodate the Ohio Department of Transportation’s (“ODOT’s”) and the City of Sylvania’s expansion of Monroe Street in the City of Sylvania, Lucas County, Ohio. Because Monroe Street will be widened, ODOT and the City of Sylvania require ATSI to relocate six existing structures.

Additionally, ATSI will have to replace a portion of conductor and shield wire where the existing conductor and shield wire cannot be re-used after pole relocation.¹ Finally, a switch will be relocated two structures to the east to improve accessibility and increase operational efficiency after the road-widening project is complete. The total length of the Project is approximately 0.24 miles.

¹ Conductor must be lengthened to account for distances and angles attendant to pole relocation.

The general location of the proposed Project is shown in Exhibit 1 and Exhibit 2. Exhibit 1 is a partial copy of a USGS Topographic Map. Exhibit 2 provides a partial copy of ESRI aerial imagery. The general layout is shown in 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 Item (5) of the Application Requirement Matrix for Electric Power Transmission Lines. Appendix A of OAC Rule 4906-1-01. This item states:

- (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 involves relocating a portion of the existing Allen Junction-Westgate 138 kV Transmission Line at the request of ODOT and the City of Sylvania for the expansion of Monroe Street. The Project will be relocated in ODOT's expanded right-of-way ("ROW").

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

This project is needed to accommodate the expansion of Monroe Street in Sylvania Ohio, at the request of ODOT and the City of Sylvania. The Allen Junction-Westgate 138 kV Transmission Line is currently within the road ROW and will be relocated to the north, within expanded road ROW, for the proposed roadway project.

ATSI will relocate six structures (#313313, #313307, #313303, #313312, #313301, and #313217) ranging from approximately 4 feet to 22 feet north from their existing positions. In addition to moving north approximately 4 feet, Str. #313217 will be shifted approximately 16 feet east of its existing location to reduce the line angle and avoid additional guying.

As part of this relocation, two structures will require guying, #313301 and #313312. Str. #313207, located on the eastern end of the Project, will require modification to the shield wire hardware, but the structure will not be replaced or moved.

The switch currently located on Str. #313313 will be relocated to Str. #313303 in order to improve accessibility and increase operational efficiency once the road widening project is complete.

Because this Project is a relocation of existing facilities and does not change the topology of the transmission system, it was not presented to PJM.

The layout and structure numbers are shown in Exhibit 3.

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. 2021 Long-Term Forecast Report. This map was submitted to the Public Utilities Commission of Ohio (“PUCO”) in Case No. 21-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. This map shows ATSI’s 345 kV and 138 kV transmission lines and transmission substations including the Allen Junction-Westgate 138 kV Transmission Line. The Project is not included in ATSI’s LTFR filed in 2021. This type of relocation project is not included in the LTFR. The general location and layout of the Project area is shown in Exhibits 1 through 3.

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

No alternatives were considered because these specific pole relocations are necessary to accommodate the Monroe Street road-widening project; the road design thus dictated the area of the new transmission facilities.

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: https://www.firstenergycorp.com/about/transmission_projects/ohio.html. ATSI will maintain the Project website and will continue to work with property owners concerning the proposed Project. Finally, during all phases of this Project, ATSI will maintain the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com, where the public may ask questions or leave comments on the Project for ATSI.

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

The construction schedule for this Project is expected to begin as early as February 2022 and completed by March 2022.

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

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

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

The Project will be constructed within new road ROW, as ODOT will acquire to accommodate the road widening and the new transmission facilities. The additional road ROW in the area of this Project will be located on the Toledo Memorial Park Cemetery (Parcel Number 8200698) and secured by ODOT prior to Project construction. In addition, ATSI will obtain the necessary guying and vegetation rights needed for the Project from the Cemetery.

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

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

The construction will have the following characteristics:

Voltage:	138 kV
Conductors:	Existing: 954 kcmil 37 AAC from Str. #313303 to #313206
New:	954 kcmil 45/7 ACSR ² from Str. #313412 to #313303
Static Wire:	7#10 Alumoweld from Str. #313303 to #313206 3#6 Alumoweld from Str. #313412 to #313303
Insulators:	Polymer Horizontal Posts Porcelain (Switch structure)
ROW Width:	Road ROW - Priority tree rights and adjacent guying rights to be obtained.
Structure Types:	Exhibit 4: Single Circuit Wood Pole Structure (Five structures needed) Exhibit 5: Single Circuit Wood Unitized 1200A Switch Structure (One structure needed)

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

The closest occupied residence or institution is approximately 20 feet from the proposed transmission line centerline; therefore, Electric and Magnetic Field (“EMF”) calculations are required by this code provision.

4906-6-05 (B)(9)(b)(i): Calculated Electric and Magnetic Fields Strength Levels

Table 2 itemizes the line loading of the Allen Junction-Westgate 138 kV Transmission Line. The normal line loading represents FirstEnergy’s peak system load for the transmission line. The emergency line loading represents the maximum line loading under contingency operation. The winter rating is based on the continuous maximum conductor rating (“MCR”) of the circuits for the single conductors per phase and an ambient temperature of zero degrees centigrade (32 °F), wind speed of 1.3 miles per hour, and a circuit design operating temperature of 100 °C (212 °F).

² This conductor rating is equivalent to the existing, which is no longer in production.

Table 2: Transmission Line Loading

Line Name	Normal Loading Amps	Emergency Loading Amps	Winter Rating Amps
Allen Junction-Westgate 138 kV Transmission Line	233	1200	1200

Table 3 provides an approximation of the magnetic and electric fields strengths of the Allen Junction-Westgate 138kV Transmission Line calculated in a 65-foot wide ROW, which is the typical width for a single circuit 138 kV wood pole line. The calculations provide an approximation of the electric and magnetic field levels based on specific assumptions utilizing the EPRI EMF Workstation 2015 program software. This program software assumes the input transmission line configuration is located on flat terrain. In addition, a balanced, three-phase circuit loading is assumed for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission line.

Table 3: EMF Calculations for Allen Junction-Westgate 138 kV Transmission Line

Allen Junction-Westgate 138 kV Transmission Line – 65ft ROW		Electric Field kV/m	Magnetic Field mG
Normal Loading	Under Lowest Conductors	1.222	20.75
	At Right-of-Way Edges	0.328 / 0.44	9.59 / 11.2
Emergency Loading	Under Lowest Conductors	1.222	106.87
	At Right-of-Way Edges	0.328 / 0.44	49.41 / 57.5
Winter Rating	Under Lowest Conductors	1.222	106.87
	At Right-of-Way Edges	0.328 / 0.44	49.41 / 57.5

4906-6-05 (B)(9)(b)(ii): Alternative Design Consideration for Electric and Magnetic Fields

The strength of EMFs can potentially be reduced by installing the transmission line conductors in a compact configuration and by selecting conductor phasing that reduces the field strengths. ATSI designs its facilities according to the requirements of the National Electrical Safety Code (“NESC”). The pole heights and configuration were chosen based on NESC specifications, engineering parameters, and cost. ATSI’s typical practice, as proposed in this Project, is to install 138 kV transmission lines primarily on

wood tangent structures supported on horizontal post insulators, as this is a compact design that reduces EMF field strengths in comparison to other installations.

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

The estimated capital cost for the proposed Project is approximately \$751,000.00, to be paid by ATSI.

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 Sylvania, Lucas County, Ohio. The main land use in the vicinity of the Project area is a cemetery, on property zoned as Commercial. The Project will not impair this land use.

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

Agricultural land is not located within the Project area.

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

As part of the investigation, a search of the Ohio Historic Preservation Office (“OHPO”) online database was conducted 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 are within 0.5-miles of the Project area. One (1) NRHP-eligible site was identified within 0.5 mile of the Project area and is included in Table 4.

The OHPO database also includes listings of the Ohio Archaeological Inventory (“OAI”), the Ohio Historic Inventory (“OHI”), previous cultural resource surveys, and the Ohio

Genealogical Society (“OGS”) cemetery inventory. One (1) OAI resource has been previously inventoried within 0.5-miles of the Project area and has been excluded from the map but is listed in Table 5. None of the OAI-listed resources intersect with the Project area. Thirty-three (33) OHI structure are listed within 0.5-miles of the Project area and are listed in Table 6. There have been no previous cultural resource surveys conducted within 0.5-miles of the Project area. Three (3) OGS Cemeteries have been identified within 0.5-miles of the Project area and are listed in Table 7. The Project will be located within expanded road ROW adjacent to the Toledo Memorial Park Cemetery, OGS ID 7063 (“Cemetery”). ATSI will be acquiring the necessary rights needed for guying and vegetation maintenance; coordination for the Project is underway with the Cemetery to minimize impacts during construction. No long-term impact or adverse effects are anticipated.

Table 4. List of Eligible National Historic Registered Places

Resource Name	Address	County	Eligibility
The Lathrop House	5362 Main St Sylvania, OH 43560	Lucas	Yes

Table 5. List of OAI Listed Archeological Resources

OAI Number	Affiliation	Description	County	Quad Name
LU0323	Prehistoric	Unknown	Lucas	Sylvania

Table 6. List of OHI Listed Structural Resources

OHI Number	Present Name	Historic Use	County	Municipality
LUC0435802	J&G's Pizza, KOV Electronics, The Paper Cellar	Financial institution	Lucas	Sylvania
LUC0436402	Kermit Apt's	Single Dwelling	Lucas	Sylvania
LUC0438102	Riling House	Single Dwelling	Lucas	Sylvania
LUC0435502	Irv's Auto Parts	Mill/Processing/ Manufacturing Facility	Lucas	Sylvania
LUC0436102	Sylvania Heritage Museum	Single Dwelling	Lucas	Sylvania
LUC0149102	Conrail Bridge 307.16 (Old Road)	Rail Related	Lucas	Sylvania
LUC0437802	Sylvania Professional Building	Mill/Processing/ Manufacturing Facility	Lucas	Sylvania
LUC0434302	Eley House	Single Dwelling	Lucas	Sylvania
LUC0435202	Pro Music & Village Electronics	Retail store/shop	Lucas	Sylvania
LUC0437902	Bedee House	Single Dwelling	Lucas	Sylvania
LUC0432802	Lawrence L Watkins Property	Single Dwelling	Lucas	Sylvania
LUC0435302	Accents & Antiques	Retail store/shop	Lucas	Sylvania
LUC0434702	Country House	Retail store/shop	Lucas	Sylvania
LUC0438202	Smith House	Single Dwelling	Lucas	Sylvania
LUC0435902	The Liaros Building	Retail store/shop	Lucas	Sylvania

LUC0435002	Chandler Building, The Apple Tree	Retail store/shop	Lucas	Sylvania
LUC0435602	Bel-Main Upholstering	Retail store/shop	Lucas	Sylvania
LUC0436202	Garden Delights Gift Shop/Store	Single Dwelling	Lucas	Sylvania
LUC0435102	Sylvan Studio	Retail store/shop	Lucas	Sylvania
LUC0434402	Bush House	Single Dwelling	Lucas	Sylvania
LUC0436502	Keith's Hair Design	Single Dwelling	Lucas	Sylvania
LUC0434102	Packard House	Single Dwelling	Lucas	Sylvania
LUC0435402	Irv's Auto Parts	Market	Lucas	Sylvania
LUC0434802	Reve's Salon	Retail store/shop	Lucas	Sylvania
LUC0436002	Maplewood Marketplace	Retail store/shop	Lucas	Sylvania
LUC0434902	Un Ver Ferth Interiors	Retail store/shop	Lucas	Sylvania
LUC0434202	The Lathrop House	Single Dwelling	Lucas	Sylvania
LUC0157202	Post Office	Post Office	Lucas	Sylvania
LUC0436302	Cross Stitch Heaven	Single Dwelling	Lucas	Sylvania
LUC0435702	Monasmith State Farm Ins	Retail store/shop	Lucas	Sylvania
LUC0432902	Gindy Residence	Single Dwelling	Lucas	Sylvania
LUC0438002	Chany House	Single Dwelling	Lucas	Sylvania

LUC0434502	Berkley & Mary H Bush House	Single Dwelling	Lucas	Sylvania
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Table 7. List of OGS Cemeteries

OGS ID	Name	County	Location
7061	Ravine	Lucas	In Sylvania. On south side of Ravine Drive. Between Harroun Road and 0.1 mile from Main Street. Adjacent to SAINT JOSEPHS CATHOLIC
7062	Saint Josephs Catholic	Lucas	In Sylvania. On south side of Ravine Drive. Between Harroun Road and Main Street
7063	Toledo Memorial Park	Lucas	In Sylvania. 6382 Monroe Street. At US 223/23

This Project is being completed at the request of ODOT and the City of Sylvania to support the Monroe Street expansion. The current centerline of the Allen Junction-Westgate 138 kV Transmission Line is located within road ROW immediately south of Toledo Memorial Park Cemetery. Road limits will be expanding north towards the cemetery due to the road widening project. This expanded area does not include any gravesites and is primarily maintained lawn adjacent to Monroe Street. The Project will be located within the expanded road ROW, as close to Monroe Street as feasible to minimize impacts to Toledo Memorial Park Cemetery while also meeting the needs of the road project. No other cultural or archeological resources will be impacted due to this Project.

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

No Local, State, or Federal environmental permits are required for this Project.

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

As part of the investigation, ATSI hired TRC to conduct the necessary environmental surveys. TRC submitted a request to the Ohio Department of Natural Resources

(“ODNR”) Office of Real Estate to conduct an Environmental Review on October 18, 2021. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife’s Natural Heritage Database to research the presence of any endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest within one (1) mile of the Project area. The ODNR’s Office of Real Estate’s response on November 5, 2021, indicated that 19 state and/or federally listed endangered species are located within a one-mile radius of the Project area. A copy of ODNR’s Office of Real Estate’s response is included as Exhibit 7.

As part of the investigation, TRC also submitted a request to the US Fish and Wildlife Service (“USFWS”) for an Ecological Review on October 18, 2021, 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 November 2, 2021, is included as Exhibit 8. The response indicated that the Project is within the range of the federally listed endangered Indiana bat (*Myotis sodalis*) and threatened 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 8.

Table 8. List of Endangered, Threatened, and Rare Species.

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

Blue-spotted salamander	<i>Ambystoma laterale</i>	N/A	Endangered	Red Maple Swamps & Woodlands
American bittern	<i>Botaurus lentiginosus</i>	N/A	Threatened	Bogs, Wet Meadows & Dense Swamps
Kirtland's snake	<i>Clonophis kirtlandii</i>	N/A	Threatened	Wetlands / Wet Meadows
Blanding's turtle	<i>Emydoidea blandingii</i>	N/A	Threatened	Marshes, Ponds, Lakes & Streams
Spotted Turtle	<i>Clemmys guttata</i>	N/A	Threatened	Marshes, Ponds, Fens & Bogs
Lark sparrow	<i>Chondestes grammacus</i>	N/A	Endangered	Grasslands
Northern harrier	<i>Circus hudsonis</i>	N/A	Endangered	Marshes & Grasslands
Trumpeter swan	<i>Cygnus buccinator</i>	N/A	Threatened	Wetlands
Black-crowned night heron	<i>Nycticorax nycticorax</i>	N/A	Threatened	Wetlands
Black tern	<i>Chlidonias niger</i>	N/A	Endangered	Marshes
Common tern	<i>Sterna hirundo</i>	N/A	Endangered	Islands & Mainland Beaches
King rail	<i>Rallus elegans</i>	N/A	Endangered	Marshes
Least bittern	<i>Ixobrychus exilis</i>	N/A	Threatened	Dense Emergent Wetlands
Sandhill Crane	<i>Grus canadensis</i>	N/A	Threatened	Grasslands, Prairies & Wetlands
Upland sandpiper	<i>Bartramia longicauda</i>	N/A	Endangered	Grasslands & Pastures
Wild lupine	<i>Lupinus perennis</i>	N/A	Species of Concern	Natural Areas & Preserves
Rayed bean	<i>Villosa fabalis</i>	Endangered	Endangered	Creeks & Rivers

Snuffbox	<i>Epiblasma triquetra</i>	Endangered	Endangered	Creeks, Lake Erie & Rivers
Eastern pondmussel	<i>Ligumia nasuta</i>	N/A	Endangered	Ponds, Lakes & Rivers
Black sandshell	<i>Ligumia recta</i>	N/A	Threatened	Rivers, Lakes & Streams
Fawnsfoot	<i>Truncilla donaciformis</i>	N/A	Threatened	Rivers
Pondhorn	<i>Unio merus tetralasmus</i>	N/A	Threatened	Ponds, Creeks & Streams
Threehorn wartyback	<i>Obliquaria reflexa</i>	N/A	Threatened	Rivers
Cisco	<i>Coregonus artedi</i>	N/A	Endangered	Lakes
Lake sturgeon	<i>Acipenser fulvescens</i>	N/A	Endangered	Lakes & Rivers
Western banded killifish	<i>Fundulus diaphanous menona</i>	N/A	Endangered	Streams & Lakes
American eel	<i>Anguilla rostrata</i>	N/A	Threatened	Streams, Lakes & Ponds
Channel darter	<i>Percina copelandi</i>	N/A	Threatened	Rivers
Greater redhorse	<i>Moxostoma valenciennesi</i>	N/A	Threatened	Rivers & Lakes

The response from ODNR and USFWS indicated the Project is within the range of the federal and state endangered Indiana Bat, the federal threatened and state endangered Northern Long-Eared Bat, the state endangered Little Brown Bat, and the state endangered Tricolored Bat. Tree clearing or trimming will be associated with the proposed Project, but any clearing or trimming will occur before April 1, 2022. Therefore, no impacts to these species are anticipated.

The response from ODNR indicated that the Project area is within the range of the state threatened Prairie thimbleweed and Plains puccoon, as well as the state potentially endangered Southern hairy rock cress, Rough pennyroyal and Wild Lupine. No impacts

to these species are expected due to the Project's site characteristics and no work is proposed in wetlands or streams. ODNR consultation letter did suggest that a pre-construction survey may be needed for the presence of Wild Lupine. *See* Exhibit 7. TRC reached out to ODNR for further clarification on the need for an additional survey; upon further review, ODNR's Chief Botanist confirmed that, due to the site location and habitat characteristics, there isn't suitable habitat along the Project ROW for any of the plant species listed (including Wild Lupine) and that no additional surveys would be needed. The email concurrence correspondence, dated November 10, 2021, is attached as Exhibit 9.

ODNR also indicated that the Natural Heritage Database has records at or within a one-mile radius of the Project area of Kirtland's Snake, Spotted turtle, Black sandshell, Fawnsfoot, Pondhorn, Threehorn wartyback, American eel, Channel darter, Greater redhorse and Blanding's Turtle, all state-threatened species. Habitat for Kirtland's Snake, Spotted turtle, Black sandshell, Fawnsfoot, Pondhorn, Threehorn wartyback, American eel, Channel darter, Greater redhorse and Blanding's Turtle include wetlands, wet meadows, lakes and streams. No in-water work or wetland work is proposed as part of this Project, so impacts to these species are not expected.

ODNR also indicated that the Natural Heritage Database has records at or within a one-mile radius of the Project area of Eastern pondmussel, Cisco, Lake sturgeon and Western banded killifish, all state-endangered species, as well as the federally-endangered Rayed bean and Snuffbox. Habitat for Eastern pondmussel, Cisco, Lake sturgeon and Western banded killifish, Rayed bean and Snuffbox include ponds, lakes and streams. No in-water work or wetland work is proposed as part of this Project, so impacts to these species are not expected.

ODNR also indicated that the project is within range of the state-endangered Blue spotted salamander. The habitat for the Blue spotted salamander consists of swamps and marshes with weak water flow that are often connected to other waterbodies. No in-water work or

wetland work is proposed as part of this Project, so impacts to this species are not expected.

ODNR also indicated that the project is within range of the state-endangered Lark sparrow, Upland sandpiper, King Rail, Black tern, Common tern, Northern harrier, as well as the state-threatened Trumpeter swan, American bittern, Least bittern, Sandhill crane and Black-crowned night heron. These species can typically be found in grasslands, marshes, and wetlands. It is unlikely that this species is present within the Project area due to the existing site characteristics consisting of mowed-maintained grass areas with ornamental trees and shrubs.

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

ODNR Office of Real Estate researched the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. ODNR's Office of Real Estate's response on November 5, 2021, indicated that they have no records of the aforementioned areas within one (1) mile of the identified Project area, however they did indicate that the Camp Miakonda Conservation Site is within one (1) mile of the Project area. Camp Miakonda Conservation Site is approximately 0.5 mile from the Project area and there will be no impacts to the conservation site.

TRC conducted a wetland and stream assessment of the Project area. As part of the investigation, TRC conducted a wetland and waterways delineation for the Allen Junction-Westgate 138 kV Relocation Project in Lucas County, Ohio on October 14, 2021. The Project Study Area is approximately 3.08-acres in size. The Project Study Area included the corridor for the Allen Junction-Westgate 138 kV Transmission Line with a 50-foot buffer. Land use surrounding the Project Study Area was observed to be maintained utility ROW, roadway ROW and institutional land (Toledo Memorial Park-cemetery). No wetlands or streams were identified within the Project Study Area during

the field survey. See Exhibit 10 for further details and descriptions of delineated features located within the Project Study Area.

The Project work limits do not encroach on any regulated flood plains based on a review of online FEMA Flood Insurance Rate Mapping. This mapping is included on page 18 (Figure 2A) of the Wetland Delineation Report (WDR), which is included in Exhibit 10.

A review of the National Conservation Easement Database (www.conservationeasement.us) revealed no conservation easements in the Project Area.

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 NESC 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 to the following officials in the City of Sylvania, Lucas County, Ohio.

Lucas County

Ms. Tina Skeldon Wozniak, President
Board of Lucas County
Commissioners
1 Government Center, Ste 800
Toledo, OH 43604

Mr. Pete Gerken, Commissioner
Board of Lucas County
Commissioners
1 Government Center, Ste 800
Toledo, OH 43604

Mr. Gary L. Byers, Commissioner
Board of Lucas County
Commissioners
1 Government Center, Ste 800
Toledo, OH 43604

Mr. Mike Pniewski - P.E., P.S.
Lucas County Engineer's Office
1049 S. McCord Road
Holland, OH 43528

City of Sylvania

Mayor Craig A. Stough
City of Sylvania
6730 Monroe St., Suite 203
Sylvania OH 43560

Ms. Deb Raszka – Senior Account
Clerk
Cemeteries Section
6730 Monroe St.
Sylvania, OH 43560

Ms. Sharon Bucher
Clark of Council
6730 Monroe St., Suite 102
Sylvania OH 43560

Mr. David France – Utility Manager
Utilities Division
6730 Monroe St.
Sylvania, OH 43560

Mr. Pat O'Brien – Superintendent
Parks & Forestry Division
8425 Sylvania-Metamora Rd.
Sylvania, OH 43560

Mr. Joe Shaw – Deputy Director
Division of Engineering
6730 Monroe St. Suite 101
Sylvania OH 43560

Mr. Timothy Burns – Zoning
Administrator
Zoning Section & Planning
Commission
6730 Monroe St., Suite 102
Sylvania, OH 43560

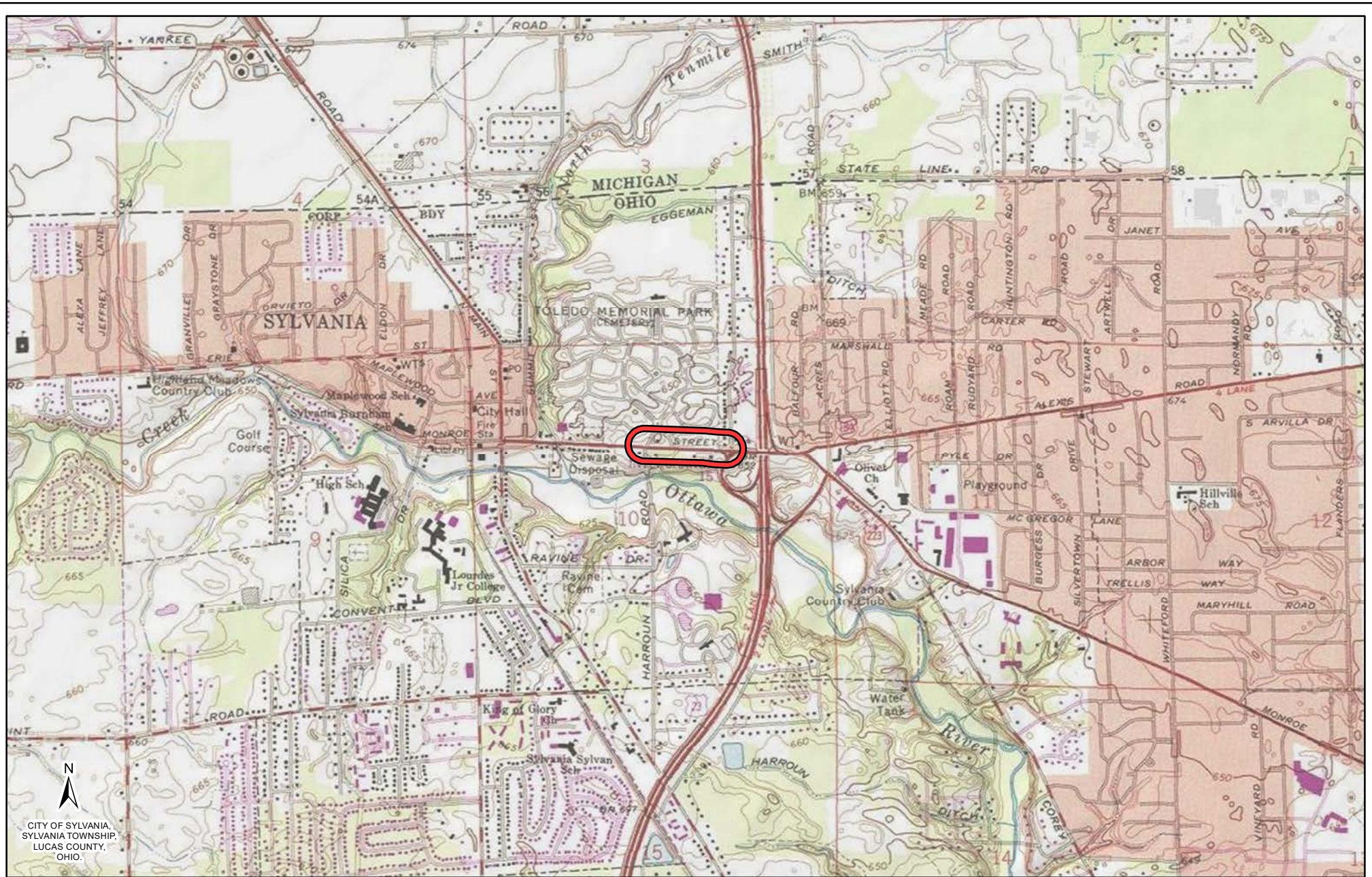
Library

Mr. Benjamin Malczewski
Branch Manager, Sylvania Branch Library
6749 Monroe Street
Sylvania, Ohio 43560


Copies of the transmittal letters to these officials have been included with the cover letter submitting this Construction Notice application to the OPSB and are being provided to meet the requirement of OAC Rule 4906-6-07(B) to provide the OPSB with proof of

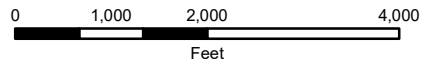
compliance with the notice requirement to local officials in OAC Rule 4906-6-07(A)(1) and to libraries in OAC Rule 4906-6-07(A)(2).

Information is posted on 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 website is being proved to meet the requirement of OAC Rule 4906-6-07(B) of providing the OPSB with proof of compliance for OAC Rule 4906-6-07(A)(3).



CITY OF SYLVANIA,
SYLVANIA TOWNSHIP,
LUCAS COUNTY,
OHIO.

LEGEND:
 Project Area



Reference:
USGS Topographical Overlay

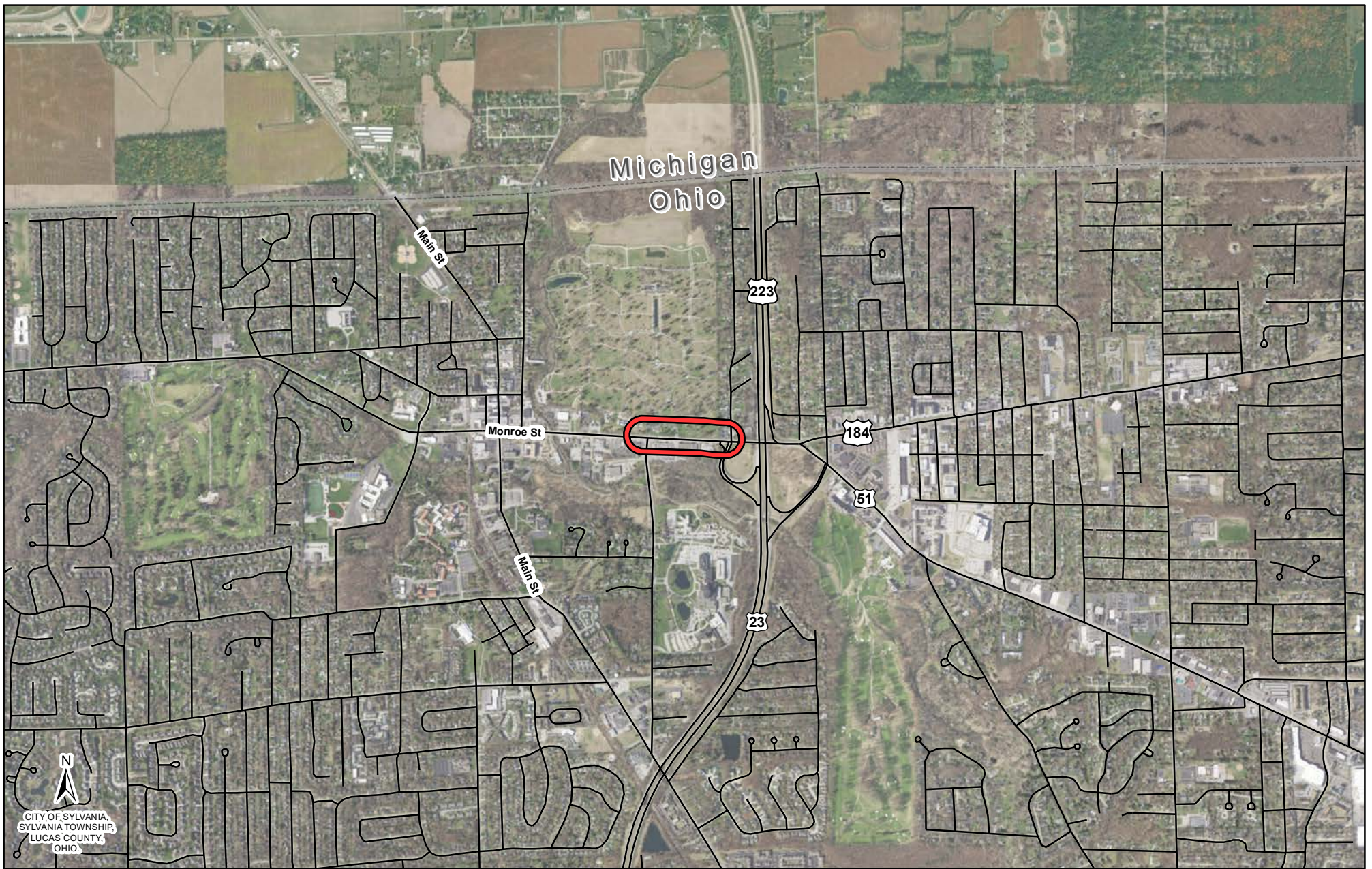
Coordinate System:
NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US



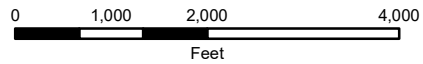
EXHIBIT 1

FirstEnergy

Allen Junction-Westgate 138 kV
Transmission Line Relocation Project



- LEGEND:**
- Project Area
 - Roads
 - State



Reference:
USGS Topographical Overlay; ODOT

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



EXHIBIT 2



Allen Junction-Westgate 138 kV
Transmission Line Relocation Project



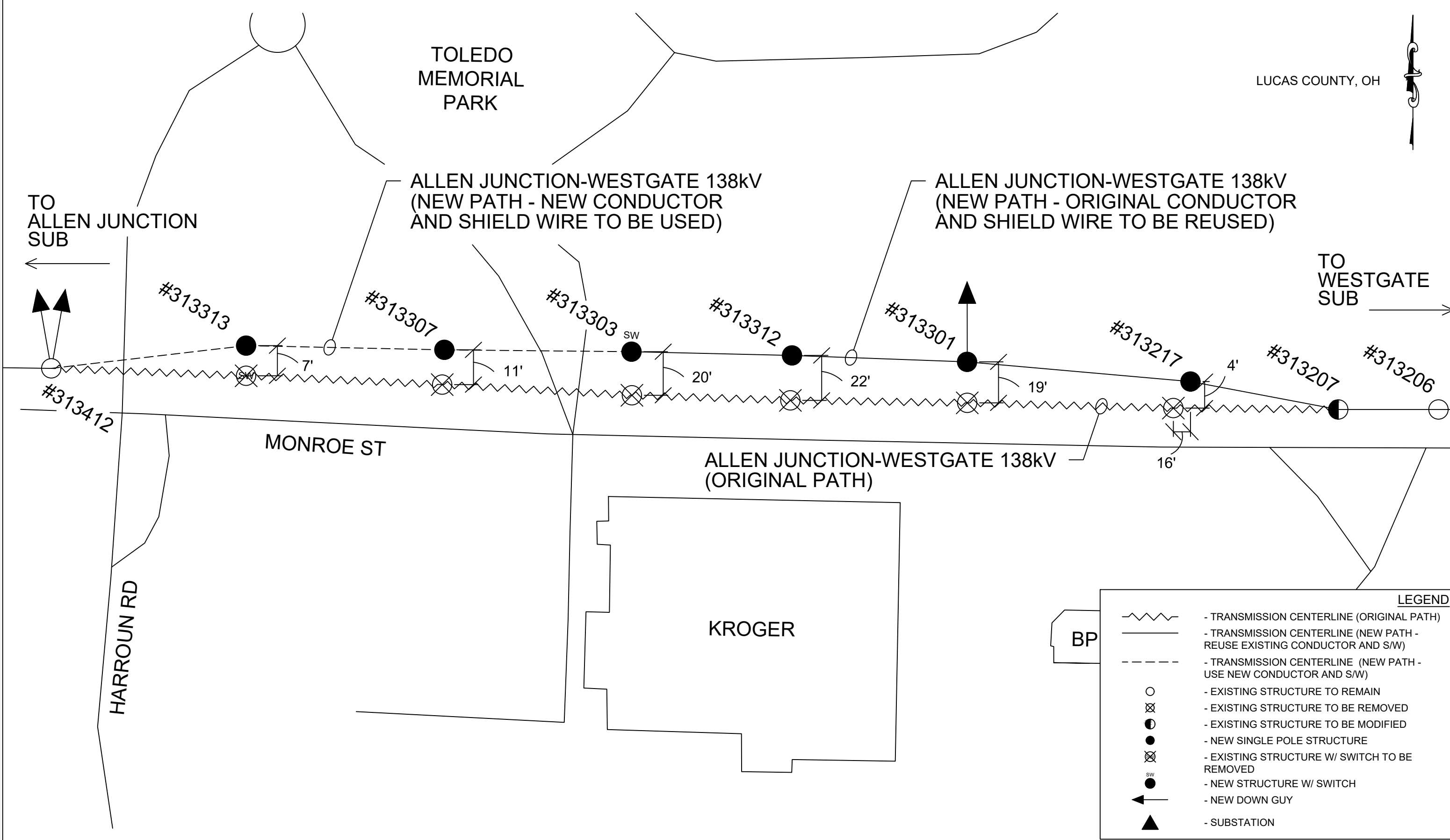
TOLEDO
MEMORIAL
PARK

ALLEN JUNCTION-WESTGATE 138kV
(NEW PATH - NEW CONDUCTOR
AND SHIELD WIRE TO BE USED)

ALLEN JUNCTION-WESTGATE 138kV
(NEW PATH - ORIGINAL CONDUCTOR
AND SHIELD WIRE TO BE REUSED)

TO
ALLEN JUNCTION
SUB
←

TO
WESTGATE
SUB →



LEGEND

- TRANSMISSION CENTERLINE (ORIGINAL PATH)
- TRANSMISSION CENTERLINE (NEW PATH - REUSE EXISTING CONDUCTOR AND S/W)
- TRANSMISSION CENTERLINE (NEW PATH - USE NEW CONDUCTOR AND S/W)
- EXISTING STRUCTURE TO REMAIN
- EXISTING STRUCTURE TO BE REMOVED
- EXISTING STRUCTURE TO BE MODIFIED
- NEW SINGLE POLE STRUCTURE
- EXISTING STRUCTURE W/ SWITCH TO BE REMOVED
- NEW STRUCTURE W/ SWITCH
- NEW DOWN GUY
- SUBSTATION

BP

ALLEN JUNCTION-WESTGATE 138kV
(ORIGINAL PATH)

KROGER

MONROE ST

HARROUN RD

SCALE: NTS

ALLEN JUNCTION-WESTGATE 138KV
TRANSMISSION LINE RELOCATION PROJECT

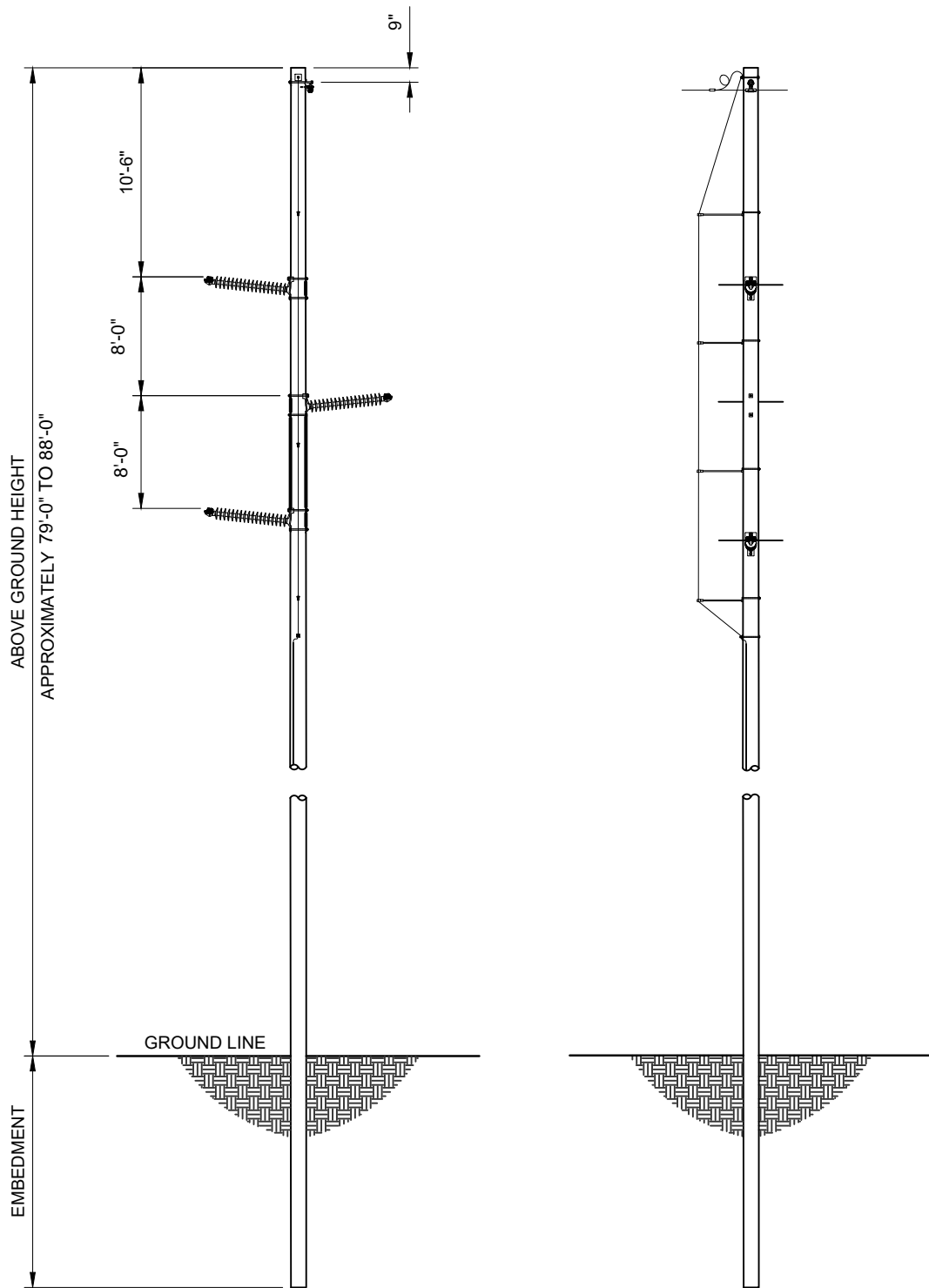
GENERAL LAYOUT



EXHIBIT 3

PAPER SIZE: 8.5X11

SCALE: NTS

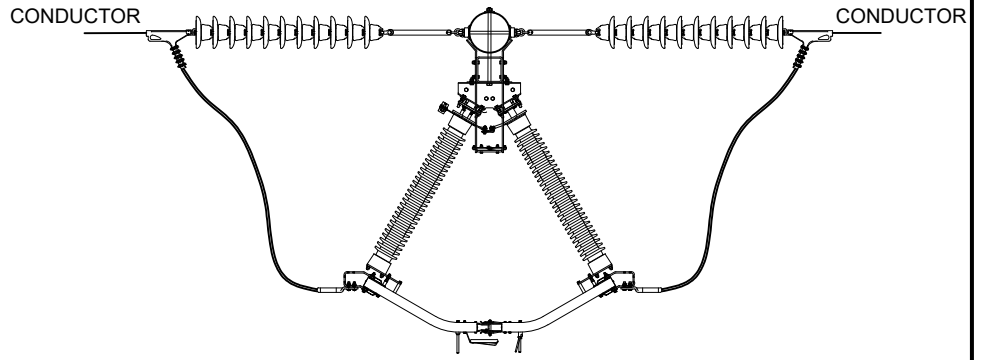


FirstEnergy
Transmission Design

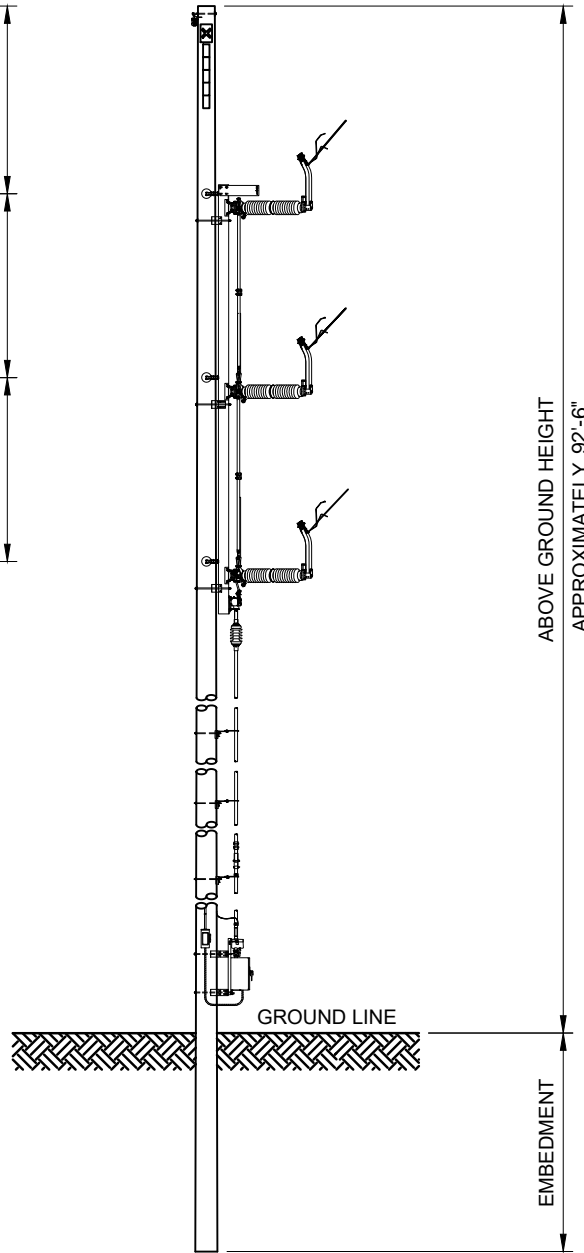
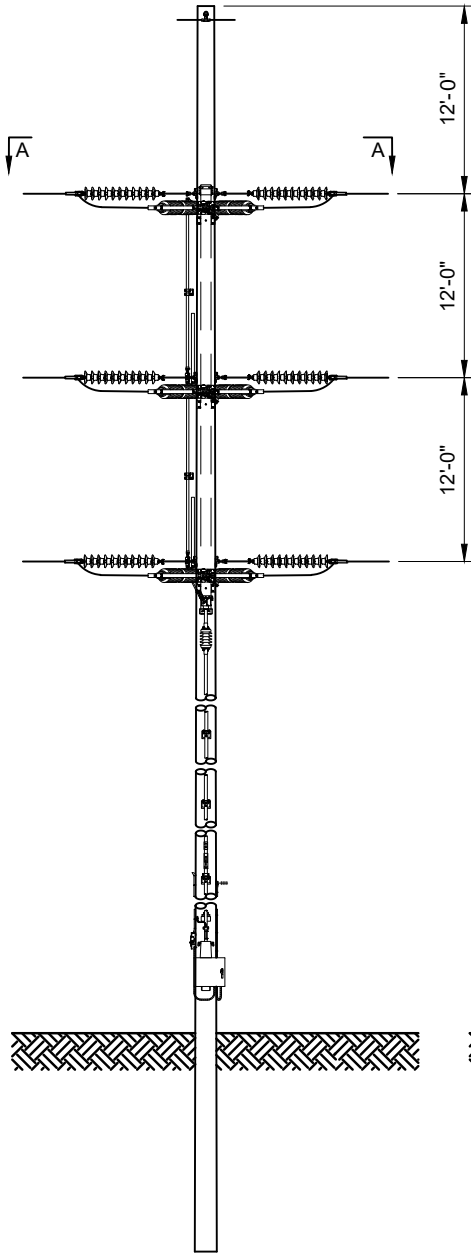
ALLEN JUNCTION-WESTGATE 138KV
TRANSMISSION LINE RELOCATION PROJECT

138KV SINGLE CIRCUIT WOOD POLE STRUCTURE
HORIZONTAL POST DELTA SINGLE POLE ANGLES 0° TO 2°

EXHIBIT 4



SECTION A-A



PAPER SIZE: 8.5X11

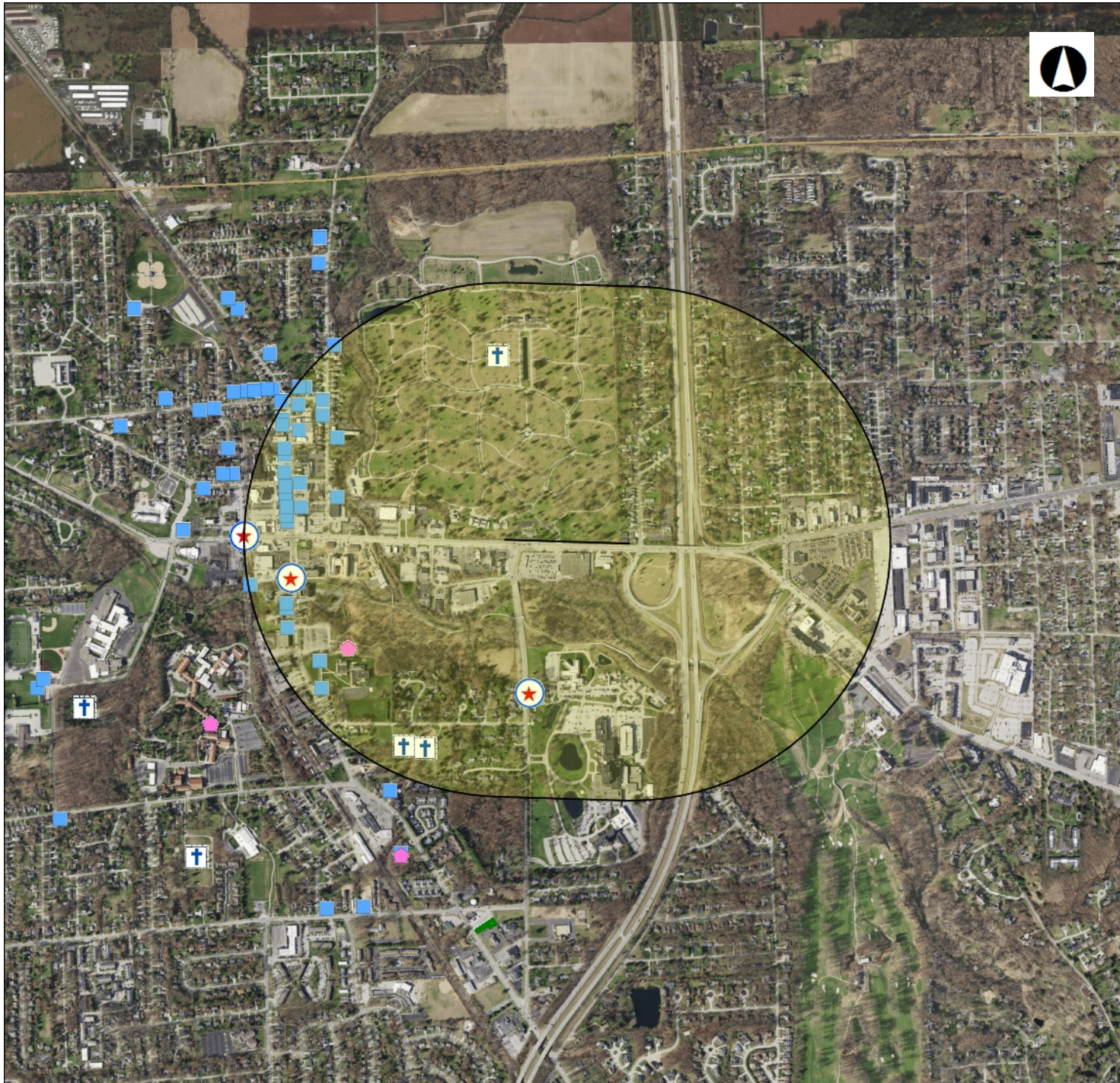
SCALE: NTS

FirstEnergy
Transmission Design

ALLEN JUNCTION-WESTGATE 138KV
TRANSMISSION LINE RELOCATION PROJECT

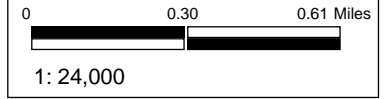
138KV SINGLE CIRCUIT-WOOD-UNITIZED 1200A SWITCH
STRUCTURE WITH WHIP OR SINGLE BOTTLE INTERRUPTER
VERTICAL SINGLE POLE ANGLES 0° TO 2°

EXHIBIT 5



Legend

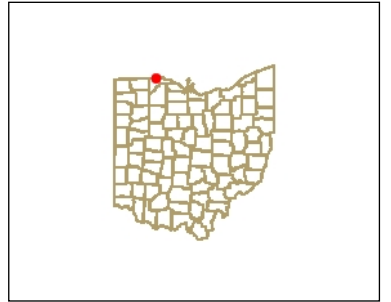
- NR Listings**
 - ★ Listed
 - ★ National Historic Landmark
 - ✘ Delisted
- Determinations of Eligibility**
 - ◆ DOE
 - ✘ Demolished
 - Historic Structures
 - Historic Bridges
 - Historic Tax Credit Projects
 - ◆ Local Designations
- OGS Cemeteries**
 - + Confident
 - + Not Confident
- Historic Markers**
 - ★ Historic Markers
- Dams
- UTM Zone Split
- NR Boundaries



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Datum: [Datum]
Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere





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

November 5, 2021

Maggie Molnar
TRC Companies
1382 W Ninth Street, Suite 400
Cleveland, Ohio 44113

Re: 21-0959; American Transmission Systems, Incorporated's Allen Junction-Westgate 138kV Relocation Project

Project: The proposed project involves the relocation of the Allen Junction-Westgate 138kV transmission line.

Location: The proposed project is located in the City of Sylvania, Lucas 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:

Prairie thimbleweed (*Anemone cylindrica*), T
Southern hairy rock cress (*Arabis pycnocarpa* var. *adpressipilis*), P
Rough pennyroyal (*Hedeoma hispida*), P
Plains puccoon (*Lithospermum carolinense*), T
Wild lupine (*Lupinus perennis*), P
Least darter (*Etheostoma microperca*), SC
Blanding's turtle (*Emydoidea blandingii*), T
Camp Miakonda Conservation Site

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.

A Conservation Site is an area deemed by the Natural Heritage Database to be a high quality natural area not currently under formal protection. It may, for example, harbor one or more rare

species, be an outstanding example of a plant community or have geologically significant features, etc. These sites may be in private ownership and our listing of them does not imply permission for access.

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

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

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

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

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH \geq 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

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

The project is within the range of the following listed mussel species.

Federally Endangered

rayed bean (*Villosa fabalis*)

snuffbox (*Epioblasma triquetra*)

State Endangered

eastern pondmussel (*Ligumia nasuta*)

State Threatened

black sandshell (*Ligumia recta*)

fawnsfoot (*Truncilla donaciformis*)

pondhorn (*Unio merus tetralasmus*)

threehorn wartyback (*Obliquaria reflexa*)

Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the of the following listed fish species.

State Endangered

cisco (*Coregonus artedi*)

lake sturgeon (*Acipenser fulvescens*)

western banded killifish (*Fundulus diaphanus menona*)

State Threatened

American eel (*Anguilla rostrata*)

channel darter (*Percina copelandi*)

greater redhorse (*Moxostoma valenciennesi*)

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 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 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 Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. 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 American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 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 black-crowned night-heron (*Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the black tern (*Chlidonias niger*), a state endangered bird. The black tern prefers large, undisturbed inland marshes with fairly dense vegetation and pockets of open water. They nest in various kinds of marsh vegetation but cattail marshes are generally favored. Nests are built on top of muskrat houses or on top of floating vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat from April 1 through June 30 to reduce impacts to this species. 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 common tern (*Sterna hirundo*), a state endangered bird. The preferred nesting sites of common terns are natural or man-made islands that are free of mammalian predators and human disturbance. They will also utilize mainland beaches and dredge disposal areas but only when islands are unavailable. The common tern nests in colonies. Their eggs are laid in a grass-lined depression in the sand. 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 king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should

be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

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 dense, tall growths of aquatic or semiaquatic vegetation (particularly cattail, sedge, rushes, arrowheads, or sawgrass) interspersed with clumps of woody vegetation and open water. Nests are made from dried vegetation suspended .5 to 2.5 feet above the 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 northern harrier (*Circus hudsonis*), 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 (*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.

Natural Areas and Preserves: The Division of Natural Areas and Preserves has the following comment.

One rare plant species, the wild lupine (*Lupinus perennis*, species of concern) has been previously found within close proximity to the project footprint. Due to the possible disruption of this species, a pre-construction survey of the proposed project site should be conducted to ensure that

the plant and any other rare species within the proposed construction limits are not impacted. If there are any questions about Ohio flora or if survey assistance is required, please contact the Division of Natural Areas and Preserves' Chief Botanist, Rick Gardner. Mr. Gardner can be contacted directly at richard.gardner@dnr.ohio.gov or 614/265-6419.

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)

[EXTERNAL] FW: Allen Junction-Westgate 138kV Relocation Project, Sylvania, Lucas County, Ohio

Bagato, Steven <sbagato@burnsmcd.com>

Wed 11/3/2021 9:15 AM

To: Latina, Alex (Humphrys, Scott M) <alatina@firstenergycorp.com>

FYI, see below.

Thank you,

Steve Bagato Jr | Burns & McDonnell

Staff Environmental Scientist / Permitting Coordinator

Environmental Services

M 760-799-3166 | O 330-315-6966

sbagato@burnsmcd.com | burnsmcd.com

341 White Pond Dr | Akron, OH 44320



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From: Falkinburg, Brad <BFalkinburg@trccompanies.com>

Sent: Wednesday, November 3, 2021 9:13 AM

To: Bagato, Steven <sbagato@burnsmcd.com>

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

Subject: FW: Allen Junc. on-Westgate 138kV Reloca on Project, Sylvania, Lucas County, Ohio

Steve, see below correspondence from USFWS for your records, no issues noted.

Regards,

Brad M. Falkinburg, PWS

Planning Permitting and Licensing

Office Practice Leader – Ecological Services



1382 West Ninth Street, Suite 400, Cleveland, OH 44113

D 216.352.6216 | O 216.344.3072 | C 440.666.2890

[LinkedIn](#) | [Twitter](#) | [Blog](#) | TRCcompanies.com

Please note that our domain name and email addresses have changed

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

Sent: Wednesday, November 3, 2021 8:11 AM

To: Falkinburg, Brad <BFalkinburg@trccompanies.com>

Subject: FW: [EXTERNAL] Allen Junc on-Westgate 138kV Reloca on Project, Sylvania, Lucas County, Ohio

FYI. I have saved in the project folder.

Thanks,

Maggie Molnar, PWS

Ecologist



781 Science Boulevard, Suite 200, Gahanna, Ohio 43230

D 614.423-6342 | C 614.949.2437

[LinkedIn](#) | [Twitter](#) | [Blog](#) | TRCcompanies.com

Please note that our address has changed.

From: Ohio, FW3 <ohio@fws.gov>

Sent: Tuesday, November 2, 2021 2:18 PM

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

Subject: [EXTERNAL] Allen Junc on-Westgate 138kV Reloca on Project, Sylvania, Lucas County, Ohio

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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# 03E15000-2022-TA-0179

Dear Ms. Molnar,

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 it is 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,

A handwritten signature in blue ink, appearing to read "Patrice Ashfield". The signature is fluid and cursive, with a large initial "P" and "A".

Patrice Ashfield
Field Office Supervisor

[EXTERNAL] FW: Wild Lupine Survey - First Energy Allen Junction-Westgate 138kV Relocation Project

Bagato, Steven <sbagato@burnsmcd.com>

Wed 11/10/2021 4:42 PM

To: Latina, Alex (Humphrys, Scott M) <alatin@firstenergycorp.com>

Hi Alex,

See the ODNR response to a species they noted in their correspondence letter. I believe this chain of emails should be included in the application.

Thank you,

Steve Bagato Jr | Burns & McDonnell
Staff Environmental Scientist / Permitting Coordinator
Environmental Services
M 760-799-3166 | O 330-315-6966
sbagato@burnsmcd.com | burnsmcd.com
341 White Pond Dr | Akron, OH 44320



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From: Richard.Gardner@dnr.ohio.gov <Richard.Gardner@dnr.ohio.gov>

Sent: Wednesday, November 10, 2021 4:04 PM

To: Falkinburg, Brad <BFalkinburg@trccompanies.com>

Cc: Mike.Pegrew@dnr.ohio.gov; Molnar, Maggie <MMolnar@trccompanies.com>; Bagato, Steven <sbagato@burnsmcd.com>

Subject: RE: Wild Lupine Survey - First Energy Allen Junction-Westgate 138kV Relocation Project

Hi Brad,

I concur that the project does not impact any suitable habitat for wild lupine or other state listed plants in that region. I do not see a need for further surveys.

Thank you.

Rick Gardner, Chief Botanist
Ohio Department of Natural Resources
Division of Natural Areas and Preserves
2045 Morse Road, H-3
Columbus, OH 43229
614-265-6419 (Office)
614-745-6781 (Cell)



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From: Falkinburg, Brad <BFalkinburg@trccompanies.com>
Sent: Wednesday, November 10, 2021 3:58 PM
To: Gardner, Richard <Richard.Gardner@dnr.ohio.gov>
Cc: Pe egrew, Mike <Mike.Pe_egrew@dnr.ohio.gov>; Molnar, Maggie <MMolnar@trccompanies.com>; Bagato, Steven <sbagato@burnsmcd.com>
Subject: Wild Lupine Survey - First Energy Allen Junction-Westgate 138kV Relocation Project

Hello Mr. Gardner,

TRC is working for FirstEnergy on their Allen Junction-Westgate 138kV Relocation Project in the City of Sylvania, Lucas County, Ohio. FirstEnergy is proposing to relocate 6 poles that parallel the roadway next to an actively maintained cemetery. The poles will be relocated further away from the road and on cemetery property that is actively maintained lawn. TRC conducted a surface water delineation and documented only ornamental shrubs, trees, and common lawn plant species throughout the study area. Attached is the ODNR letter for your reference. Also attached is a photo log of the project study area showing mowed lawn habitat throughout, a USACE datasheet showing the existing vegetation of the site, and a study area map. Would you concur that a Wild Lupine Survey for this project is unnecessary due to the lack of habitat and confirmation that the entire project area is mowed lawn habitat.

Regards,

Brad M. Falkinburg, PWS
Planning Permitting and Licensing
Office Practice Leader – Ecological Services



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Surface Water Delineation Report

Allen Junction-Westgate 138kV
Relocation Project

October 29, 2021

City of Sylvania,
Lucas County, Ohio

Prepared For:



FirstEnergy Corporation
341 White Pond Drive, Building B3
Akron, Ohio 44320

Prepared By:
TRC Companies, Inc.
1382 West Ninth Street, Suite 400
Cleveland, Ohio 44113

TRC Project Number: 429847.0017



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APPENDICES

- Appendix A Figures
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- Appendix C Data Forms

ACRONYMS

ATSI	American Transmission Systems, Incorporated
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
FAC	Facultative
FACU	Facultative Upland
FACW	Facultative Wetland
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FirstEnergy	FirstEnergy Corporation
GIS	Geographic Information Systems
GPS	Global Positioning System
HHEI	Headwater Habitat Evaluation Index
HUC	Hydrologic Unit Code
LRR-R	Northeastern Forests Subregion
NHD	National Hydrography Dataset
NWI	National Wetlands Inventory
OAC	Ohio Administrative Code
OBL	Obligate Wetland
OEPA	Ohio Environmental Protection Agency
OHWM	Ordinary High Water Mark
ORAM	Ohio Rapid Assessment Method
PCN	Pre-Construction Notification
Project	Allen Junction-Westgate 138kV Relocation Project
Project Study Area	3.08-acres, that follows an approximately 0.25-mile-long corridor, adjacent and to the north of Monroe Street located in the City of Sylvania, Lucas County, Ohio
QHEI	Qualitative Habitat Evaluation Index
Redox	Redoximorphic
<i>Regional Supplement</i>	<i>Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (Version 2.0)</i>
Report	Surface Water Delineation Report for the Allen Junction-Westgate 138kV Relocation Project
ROP	Rule Out Point
TNM	The National Map
TRC	TRC Companies, Inc.
UPL	Obligate Upland
U.S.	United States
USACE	United States Army Corps of Engineers
USDA-NRCS	United States Department of Agriculture – Natural Resources Conservation Service
USFWS	United States Fish and Wildlife Service

USGS
WQC
1987 Manual

United States Geological Survey
Water Quality Certification
*United States Army Corps of Engineers 1987 Wetland Delineation
Manual*

1.0 Introduction

On behalf of American Transmission Systems, Incorporated (ATSI), a FirstEnergy Corporation (FirstEnergy) company, TRC Companies, Inc. (TRC) performed a surface water delineation for the Allen Junction-Westgate 138kV Relocation Project (Project). The proposed Project Study Area is approximately 3.08-acres, that follows an approximately 0.25-mile-long corridor, adjacent and to the north of Monroe Street located in the City of Sylvania, Lucas County, Ohio. On behalf of ATSI, TRC has prepared this Surface Water Delineation Report (Report) for the Project. A location map of the Project Study Area can be found in **Appendix A, Figure 1**.

On October 14th, 2021, TRC personnel performed field investigations to evaluate and delineate surface water resources (i.e., wetlands and streams) located within the Project Study Area. The delineations were conducted by qualified wetland scientists in accordance with the United States (U.S.) 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. This Report describes the surface water delineation methodology implemented and the existing surface water resources identified within the Project Study Area during field investigations.

The Project Study Area is located between the approximate coordinates: 41.71550, -83.69549 (western terminus) and 41.71542, -83.69045 (eastern terminus); located in the City of Sylvania, Lucas County, Ohio. The land within the Project Study Area consists of maintained utility right-of-way (ROW), roadway ROW, and institutional land (Toledo Memorial Park—cemetery) uses, totaling 3.08-acres. **Appendix A, Figure 1 and Figure 2**, provides further information on the location of the proposed Project Study Area.

2.0 Methodology

To complete the surface water delineation and evaluation of the Project Study Area, TRC followed the guidelines and methods outlined by the USACE and Ohio Environmental Protection Agency (OEPA), as described within this section.

2.1 Wetland Parameters

The *USACE 1987 Wetland Delineation Manual (1987 Manual)* (USACE, 1987) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (Version 2.0) (Regional Supplement)* (USACE, 2012), and the March 6, 1992 guidance memorandum (Williams, 1992) emphasize a three parameter approach to wetland boundary determination in the field. This approach involves the following:

- i. Evidence of wetland hydrology;
- ii. Presence of hydric soils; and
- iii. Predominance of hydrophytic vegetation as defined by *The National Wetland Plant List: 2018 Wetland Ratings* (Lichvar, 2018).

Positive indicators of all three parameters are normally present in wetlands and serve to distinguish between both dry land and transitional plant communities.

2.1.1 Hydrology

The *1987 Manual* and *Regional Supplement* provide guidelines for determining the presence of wetland hydrology. Criteria for wetland hydrology are met if the area is inundated or saturated at the soil surface during the growing season for a time sufficient to develop hydric soils and to support hydrophytic vegetation.

2.1.2 Hydric Soils

Hydric soils are defined as soils “that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil” (Federal Register, 1994). Hydric soil indicators described in the *Field Indicators of Hydric Soils in the United States: A Guide for Identifying and Delineating Hydric Soils Version 8.2* (USDA, NRCS, 2018) were used to identify and document hydric soils as described in the *Regional Supplement*.

2.1.3 Hydrophytic Vegetation

To determine the presence of hydrophytic vegetation, the dominant and non-dominant species in each major vegetative stratum (e.g., tree, shrub/sapling, herbaceous, and woody vine) were identified and recorded.

Plants are placed into indicator status categories depending on their probability of occurring in a wetland in accordance with the USACE’s *The National Wetland Plant List: 2018 wetland ratings* (Lichvar, 2018). There are five indicator status categories for plants:

1. Obligate wetland plants (OBL): plants that occur almost always (>99%) in wetlands in natural conditions, but which may also occur rarely (<1%) in non-wetlands;
2. Facultative wetland plants (FACW): plants that occur usually (>67-99%) in wetlands but also occur (1-33%) in non-wetlands;
3. Facultative plants (FAC): plants with a similar likelihood (33-67%) of occurring in both wetlands and non-wetlands;
4. Facultative upland plants (FACU): plants that occur sometimes (1-<33%) in wetlands, but occur more often (>67-99%) in non-wetlands; and
5. Obligate upland plants (UPL): plants that occur rarely (<1%) in wetlands but occur almost always (>99%) in non-wetlands under natural conditions.

A prevalence of dominant species that are FAC, FACW, and/or OBL indicates the presence of hydrophytic vegetation.

2.2 USACE Wetland Delineation

Qualified wetland scientists from TRC conducted surface water field investigations on October 14th, 2021. The surface water field investigations were conducted within the predetermined Project Study Area (**Appendix A, Figure 1**) that was developed in accordance with the Project location information provided by FirstEnergy. Surface water delineations were conducted using the Federal Routine Determination Method presented in the *1987 Manual* and *Regional Supplement*, including clarifications and interpretations provided in the March 6, 1992 guidance memorandum, and the USACE and Environmental Protection Agency (EPA) guidance on jurisdictional forms (EPA and USACE, 2007 and USACE, 2008).

Hydrology was determined based on a number of indicators that are divided into two categories, primary and secondary. The *1987 Manual* defines hydrology as present when at least one primary indicator (i.e. surface water, saturation, etc.) or two secondary indicators (i.e. geomorphic position, stunted or stressed plants, etc.) are identified. One primary indicator is sufficient to determine if hydrology is present; however, if these are absent then two or more of the secondary indicators are required to determine hydrology. If other probable hydrologic evidence was found, then this was subsequently documented on the data form.

Soils were examined in the field by using a tile spade, generally to a depth of at least 22 inches below the soil surface or until refusal, whichever was shallower. Soil coloration was identified using a *Munsell Soil Color Chart* (Munsell Color Company, 2009). Other characteristics, such as the presence of redoximorphic (Redox) concentrations and depletions and soil texture were also recorded. Redox concentrations and depletions are created when the soil is saturated and has anaerobic conditions (without oxygen gas) which leads to changes in the chemical processes in the soil that produce visible color changes in the soil. Hydric characteristics such as organic soil layers, depleted matrix, gleying, and hydrogen sulfide odor, were noted when observed. Soils at both wetland (if present) and dry land data plot locations were characterized and recorded on the data form.

The presence of hydrophytic vegetation was determined using the procedures described in the *Regional Supplement* and recorded on the data form. Vegetation in both dry land and wetland communities was characterized using a real dominance method, with a radius of 30-feet around the soil sample location for trees and woody vines, 15-foot radius for saplings and shrubs, and a 5-foot radius for herbaceous plants. Plant communities meeting the “50/20” Rule or meeting one of the other indicators set forth in the *1987 Manual, Regional Supplement*, and guidance memorandums are considered hydrophytic for the purposes of the wetland classification criteria. In areas where the vegetation was disturbed or not identifiable due to seasonal conditions, soil and hydrology characteristics, and professional judgment/experience were utilized in assessing the primary determining factors for classification as wetlands.

If the soils, hydrology, and vegetation characteristics at a survey point indicated that it was within a wetland, the boundary of the wetland was determined, and the approximate boundary was

flagged using wetland flagging and recorded using a handheld Trimble R1 Receiver with sub-meter accuracy. Areas observed to have problematic or difficult situations were delineated utilizing the procedures identified in the *Regional Supplement*, Section 5 – “Difficult Wetland Situations in the Northcentral and Northeast Region.” Data from the Global Positioning System (GPS) survey was downloaded and integrated into a Geographical Information Systems (GIS) database for the proposed work areas and used to make the accompanying figures. Identified wetlands were classified according to Cowardin et al. (1979). Photographs are included in **Appendix B**.

2.3 OEPA Ohio Rapid Assessment Method

According to the Ohio Wetland Water Quality Standards, a wetland quality category (Category 1, Category 2, or Category 3) must be assigned for each wetland if a project will require discharge of dredged or fill material into jurisdictional wetlands. In general, Category 1 wetlands are considered to be of “low quality”, Category 2 wetlands are considered to be of “moderate quality” and Category 3 wetlands are considered to be of “high quality.”

The OEPA has developed the Ohio Rapid Assessment Method (ORAM), which can be utilized to evaluate wetland habitat quality based on the apparent functions and values of the wetland resource. The two primary components of the ORAM are the Narrative Rating and the Quantitative Rating. TRC completed ORAM (Version 5.0) Quantitative Rating forms for all the wetland resources identified within the Project Study Area. Each delineated wetland resource received a provisional category designation based on the results of the ORAM Narrative and Quantitative Ratings and review of narrative criteria in the Ohio Administrative Code (OAC) 3745-1-54(C) (Mack, 2000).

2.4 USACE Waterbody Identification

During field investigations, other waterbody features including streams, ponds, lakes, etc. were investigated. Streams within the Project Study Area were identified by the presence of an ordinary high water mark (OHWM) and scoured channel or defined bed and banks. All streams identified in the Project Study Area that were wider than five feet were demarcated via GPS from bank-to-bank. Streams that were less than five feet wide had the centerline demarcated.

Identified streams were evaluated utilizing OEPA approved methods for stream habitat assessment which include the Qualitative Habitat Evaluation Index (QHEI) (Ohio EPA, 2006) and/or the Headwater Habitat Evaluation Index (HHEI) (Ohio EPA, 2020) assessment method. These approved assessment methods provide an empirical, quantified evaluation of streams as required by the State of Ohio for permitting and mitigation purposes. These methods assess stream habitat to provide a qualitative index (score) to determine the level of compensatory mitigation that may be needed for impacts to waters of the U.S (i.e., streams).

Use of the QHEI or HHEI assessment method is determined based on the size of the stream’s drainage area and/or the stream’s pool depths. Where coverage was available, the drainage area

was calculated using automated basin characteristics from StreamStats v 4.5.2: Ohio (USGS, 2018a).

Following OEPA guidance, streams with a drainage area of greater than 1.0 square mile (2.6 square kilometers) or which have pools with maximum depths over 15.8 inches (40.0 centimeters), as determined by measuring pool depth within the stream, were evaluated using the QHEI. Data on these streams were collected on the QHEI form provided by the OEPA. The QHEI is composed of six principal metrics: substrate, instream cover, channel morphology, riparian zone and bank erosion, pool/glide and riffle-run quality, and map gradient. Each metric is scored separately and summed to obtain the total QHEI score. Using the scoring methods associated with these forms, the stream is placed into the following general narrative ranges, dependent on stream size; for smaller streams (≤ 20 sq. mi): Excellent >70 , Good 55-69, Fair 43-54, Poor 30-42, and Very Poor <30 ; for larger streams (>20 sq. mi): Excellent >75 , Good 60-74, Fair 45-59, Poor 30-44, and Very Poor <30 .

The HHEI was utilized to score streams with a drainage area of <1.0 square mile (2.6 square kilometers). Data on these streams were collected on the HHEI forms, provided by the OEPA. Observational data regarding the physical nature of the stream corridor including stream flow, riparian zone land use and buffer width, and channel modification were recorded. Measurements included bankfull width, maximum pool depth and substrate composition.

Streams identified during the course of the investigation were classified as perennial, intermittent, or ephemeral waterways in accordance with the rationale defined by the USACE Buffalo District.

The Project Study Area was also investigated for areas that were considered “open water” by the USACE. According to the USACE an open water is any area that in a year with normal patterns of precipitation has water flowing or standing above ground to the extent that an ordinary high water mark can be determined. Aquatic vegetation within the area of flowing or standing water is either non-emergent, sparse, or absent. Vegetated shallows are considered to be open waters. Examples of “open waters” may include rivers, lakes, and ponds. Artificial “open water” features may include stormwater retention basins, fish hatchery ponds, drainage tile pump stations, etc.

3.0 Results

3.1 Site Description

The Project Study Area is an approximately 3.08-acre corridor located in the City of Sylvania, Lucas County, Ohio; within the North Tenmile Creek watershed (12-Digit Hydrologic Unit Code [HUC]: 041000010305) and Heldman Ditch-Ottawa River watershed (12-Digit HUC: 041000010307) (USGS, 2021).

Based on the review of the Sylvania, Ohio (1980) United States Geological Service (USGS) 7.5-minute series topographic quadrangles, the Project Study Area does not contain any streams or wetlands (USGS, 1980) (**Appendix A, Figure 1**).

There are no U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) riverine or wetland features mapped within the Project Study Area (**Appendix A, Figure 2A**) (USFWS, 2011).

The USGS National Hydrography Dataset (NHD) (USGS, 2018) Downloadable Data Collection from The National Map (TNM) is a comprehensive set of digital spatial data that encodes information about naturally occurring and constructed bodies of surface water (lakes, ponds, and reservoirs), paths through which water flows (canals, ditches, streams, and rivers), and related entities such as point features (springs, wells, stream gages, and dams). There are no NHD streams mapped within the Project Study Area (**Appendix A, Figure 2A**).

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panels 39095C0054E (eff. date 8/16/2011) the proposed Project is not located within a mapped 100-year floodplain (**Appendix A, Figure 2A**) (FEMA, 2021).

The United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS) Web Soil Survey (USDA-NRCS, 2016) was used to identify the soil types contained within the Project Study Area (**Appendix A, Figure 2B**). **Table 1** provides a summary of the soils identified within proposed Project Study Area.

Table 1. Soils Type Summary

Map Unit Symbol	Map Unit Name	Hydric Status	Acres Within Study Area	Percent Cover in Study Area
OtB	Ottokee fine sand, 0 to 6 percent slopes	Non-Hydric with Hydric Inclusions	2.50	81.2%
OuB	Ottokee-Urban land complex, 0 to 6 percent slopes	Non-Hydric with Hydric Inclusions	0.06	1.8%
Uo	Udorthents, loamy	Non-Hydric	0.52	17.0%
TOTAL			3.08	100%

Notes:

Accessed online October 13, 2021 at: <http://websoilsurvey.sc.egov.usda.gov>.

3.2 Surface Water Resource Field Delineations

TRC performed the field investigation on October 14th, 2021. Weather conditions were warm for the season, ranging between 65 degrees to 82 degrees Fahrenheit, and mostly sunny skies. Native and non-native herbaceous vegetation was observed within the Project Study Area. The USACE maintains the final authority that determines jurisdiction; therefore, statements about jurisdiction within this Report are preliminary and subject to final determination by the USACE and OEPA.

3.2.1 Wetlands

During the field investigation, no wetlands were delineated within the Project Study Area. While on-site, TRC completed a rule out point (ROP) to document existing conditions at the time of the survey. Associated wetland determination forms are located in **Appendix C** and additional information on the location of this ROP (Upland 1) can be found on **Figure 3** in **Appendix A**.

3.2.2 Waterbodies

During the field investigations, no streams were delineated within the Project Study Area.

4.0 Permitting Considerations

The proposed Project is located within the USACE Buffalo District. As proposed, jurisdictional wetlands and streams will not be temporarily or permanently impacted by the proposed Project activities. This Project is not located in a township listed in Appendix 1 to Regional General Condition 5(a) (Endangered Species and Threatened Species). Based on TRC's understanding of the Project, a Section 404 PCN is not required as no surface water features are proposed for impact or located within the Project Study Area.

The Project is located within an "Eligible" area according to OEPA's Stream Eligibility for Nationwide Permit Program (OEPA, 2017) and therefore is eligible for coverage under the OEPA 401 Water Quality Certification (WQC) for Nationwide Permits (**Appendix A, Figure 4**).

4.1 USACE Verification

The USACE has the authority to determine and/or verify the geographical boundaries of Waters of the U.S. in accordance with 33 Code of Federal Regulations (CFR) 328 and 33 CFR 329; therefore, the results of this Report are termed "preliminary" until verified and accepted by the USACE. This verification is part of the Jurisdictional Determination process, which is required for approval under Section 404 Clean Water Act, Section 401 WQC, and/or isolated wetland permitting process through OEPA. It is the responsibility of any party that intends to discharge dredge or fill material into Waters of the U.S. to comply with all applicable regulations.

5.0 Limitations

This Report is limited in scope to the specific terms of the Agreement previously entered into between TRC and FirstEnergy. This Report represents the conditions within the Project Study Area identified herein, as of the inspection dates.

Should the Project change from the scope described herein, TRC should be immediately notified such that additional investigations may be conducted to amend the content of the Report herein. Human-induced and/or natural changes within the Project Study Area may occur after the date of this investigation and may result in changes to the presence, extent, and classification of the surface water resources identified within this Report.

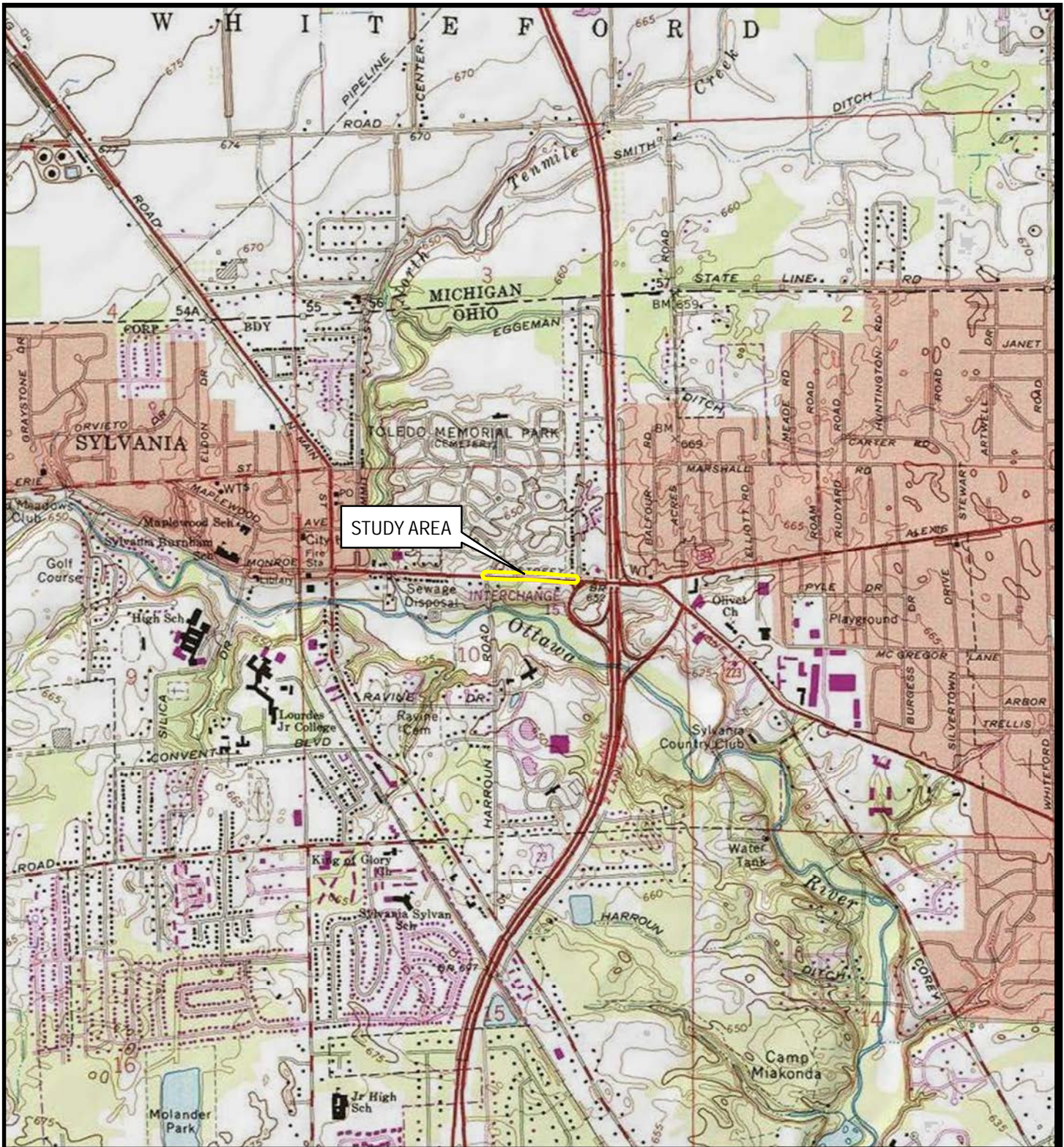
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Appendix A

Figures



BASE MAP FROM USGS TOPOGRAPHIC MAP WEB SERVICE. QUAD: SYLVANIA (1980)



1382 West Ninth Street
Suite 400
Cleveland, OH 44113
Phone: 216-344-3072

TRC - GIS

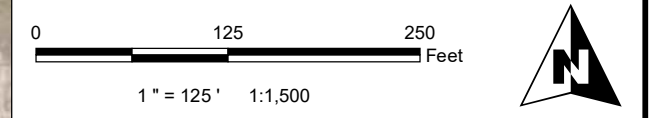
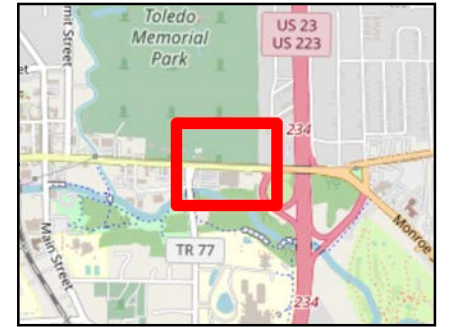
PROJECT:
**FIRSTENERGY
ALLEN JUNCTION-WESTGATE 138KV RELOCATION**

TITLE:
**FIGURE 1
SITE LOCATION MAP**



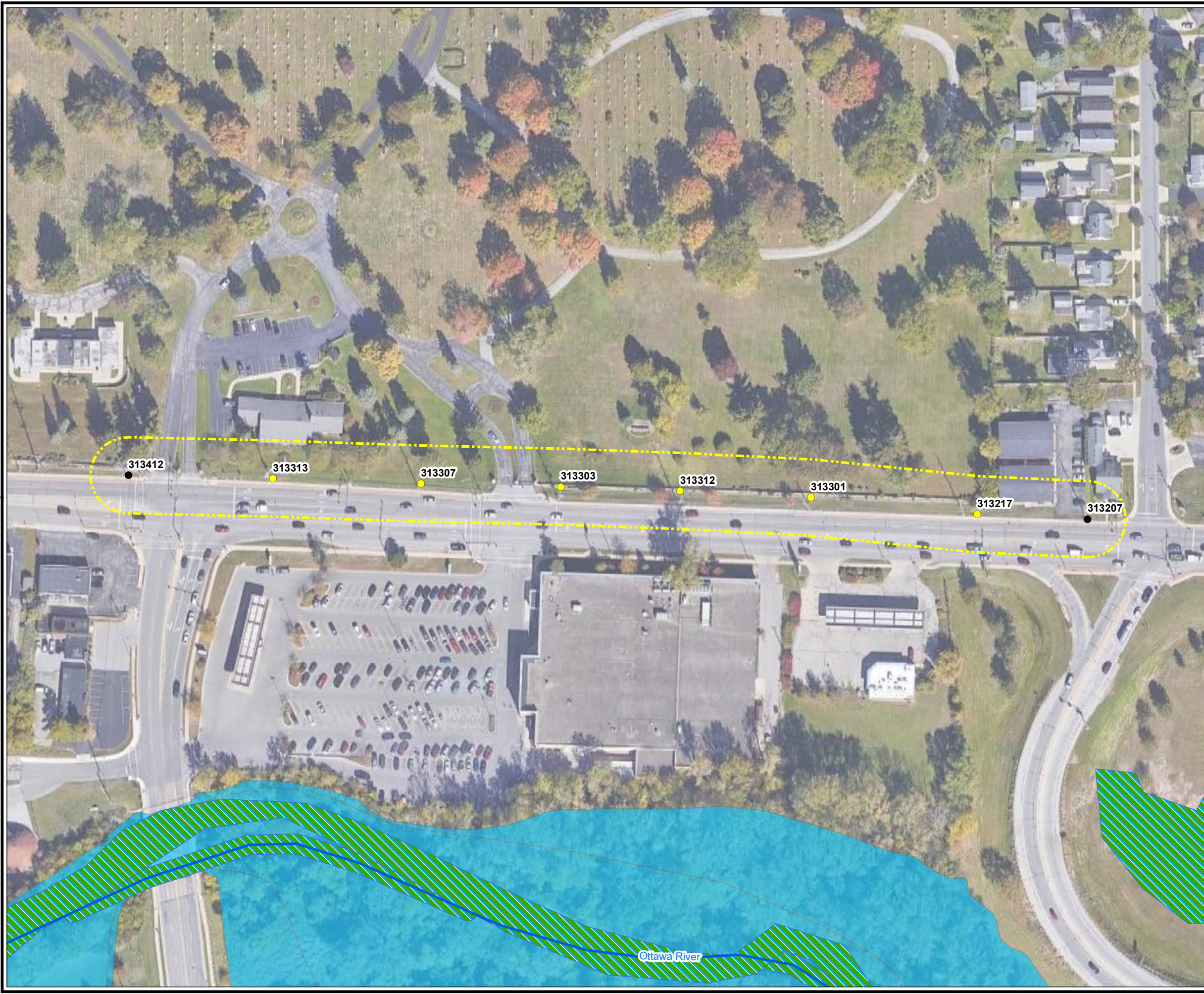








- STUDY AREA
- REPLACE AND RELOCATE STRUCTURE
- EXISTING STRUCTURE (TO BE MODIFIED)

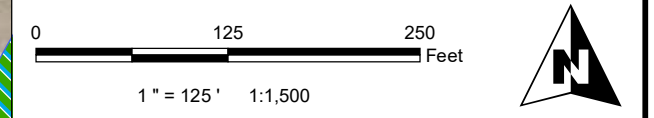
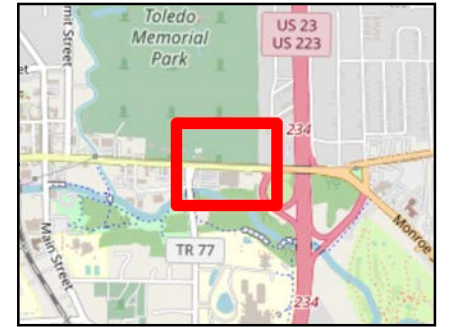


**FIRSTENERGY
ALLEN JUNCTION-WESTGATE 138KV RELOCATION**

**FIGURE 2
AERIAL MAP**

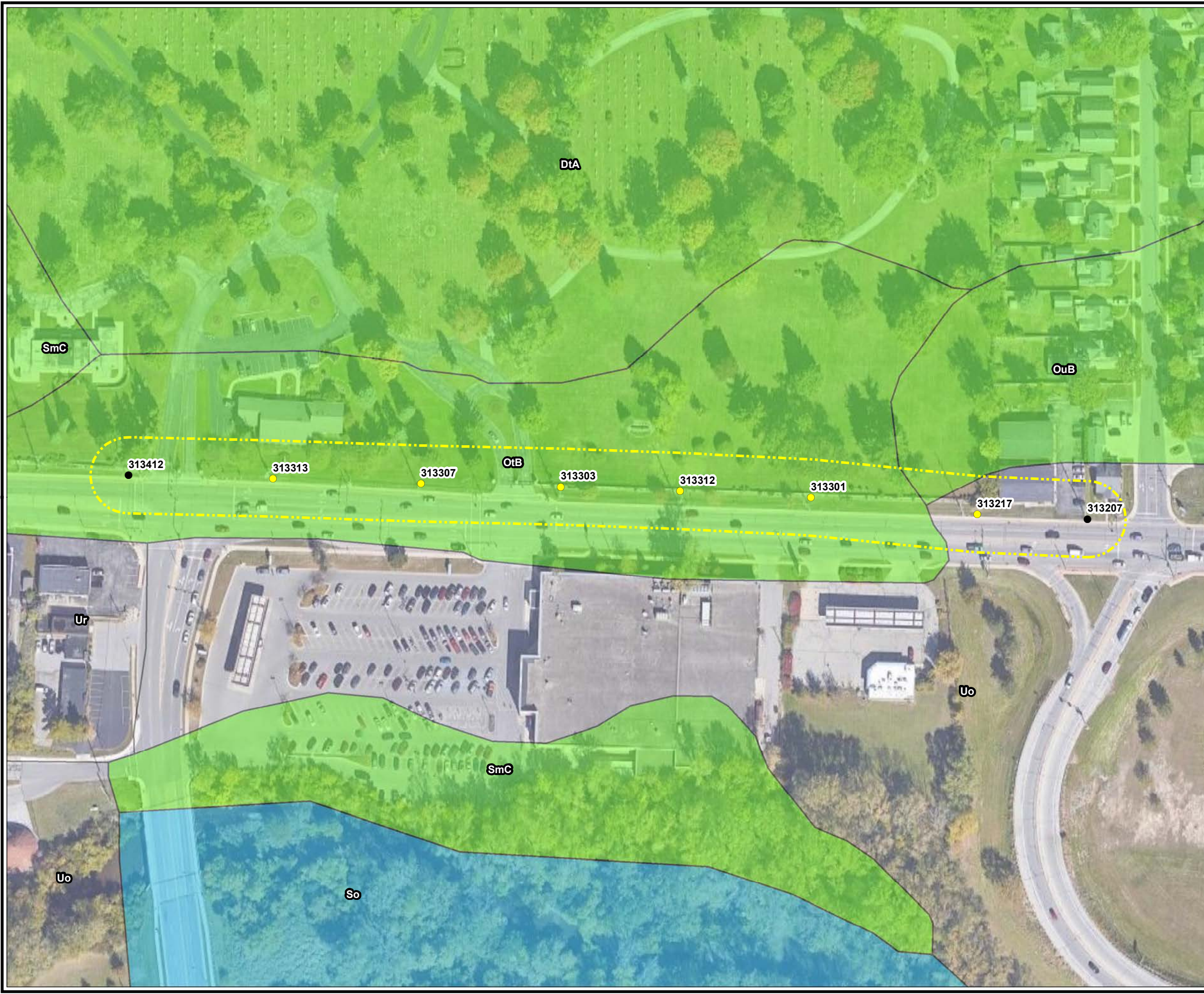


-  STUDY AREA
-  REPLACE AND RELOCATE STRUCTURE
-  EXISTING STRUCTURE (TO BE MODIFIED)
-  NATIONAL HYDROGRAPHY DATASET (NHD) STREAM
-  NATIONAL WETLANDS INVENTORY (NWI)
-  FEMA 100-YEAR FLOODPLAIN (PANEL NO.:39095C0054E, EFFECTIVE 8/16/2011)



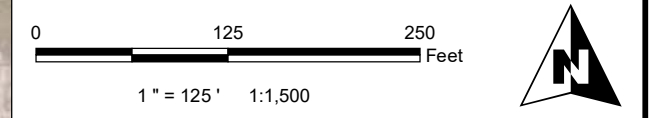
**FIRSTENERGY
ALLEN JUNCTION-WESTGATE 138KV RELOCATION**

**FIGURE 2A
NWI, NHD & FEMA FLOODPLAIN MAP**



- STUDY AREA
- REPLACE AND RELOCATE STRUCTURE
- EXISTING STRUCTURE (TO BE MODIFIED)
- HYDRIC SOIL
- NON-HYDRIC W/ HYDRIC INCLUSIONS SOIL
- NON-HYDRIC SOIL

Soil Map Unit	Soil Name
OtB	Ottokee fine sand, 0-6% slopes
OuB	Ottokee-Urban land complex, 0-6% slopes
Uo	Udorthents, loamy



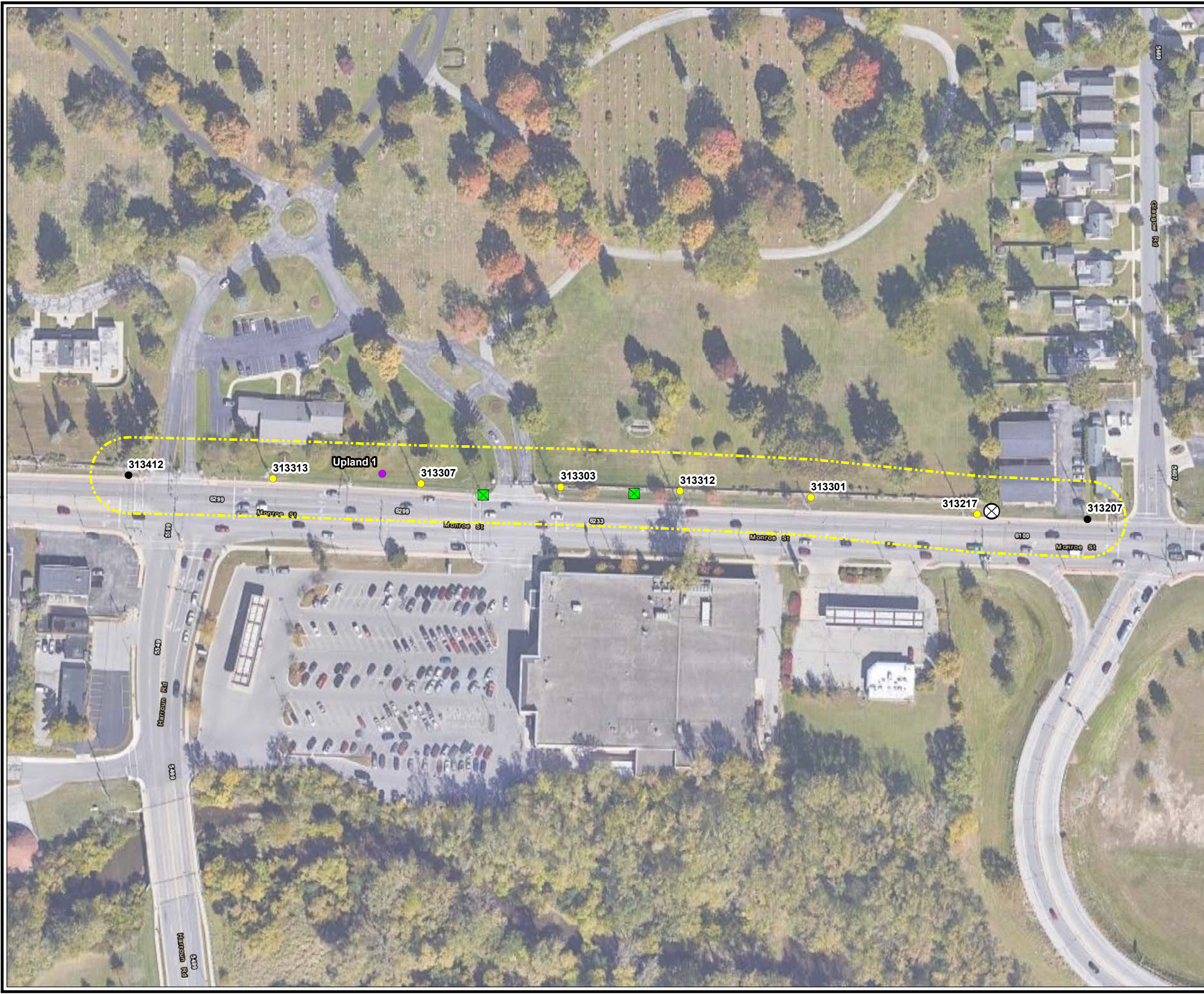
**FIRSTENERGY
ALLEN JUNCTION-WESTGATE 138KV RELOCATION**

**FIGURE 2B
SOIL MAP**

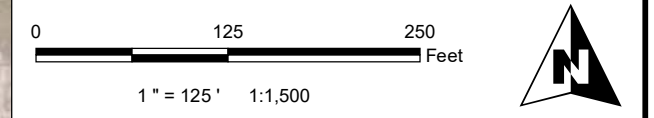


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OCTOBER 2021 Fig02b_Soils.mxd



- STUDY AREA
- REPLACE AND RELOCATE
- EXISTING STRUCTURE (TO BE MODIFIED)
- RULE OUT POINT
- ⊗ CULVERT
- CATCH BASIN



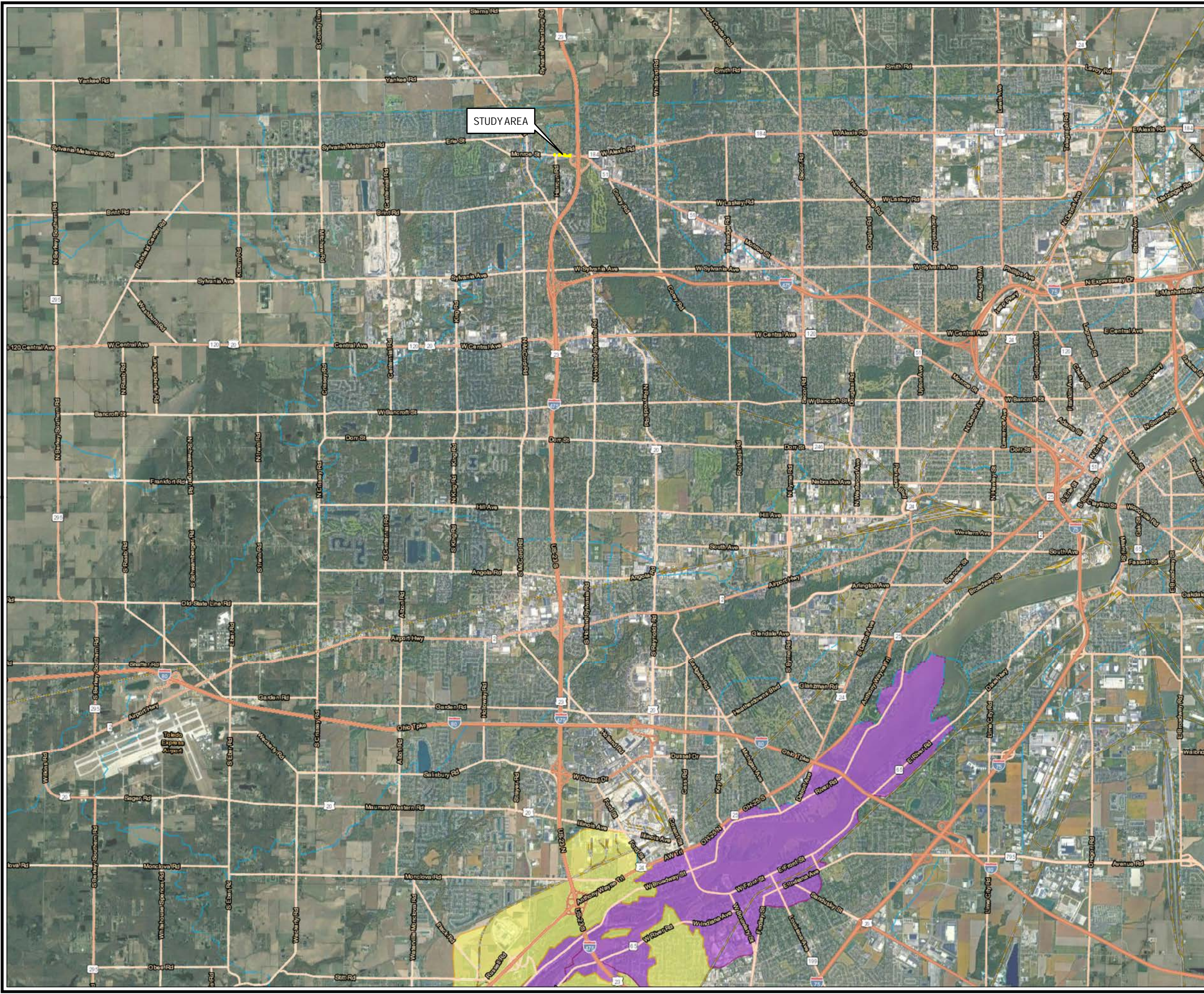
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**FIGURE 3
DELINEATED RESOURCES MAP**



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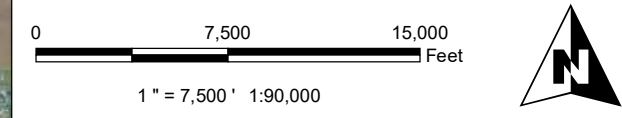
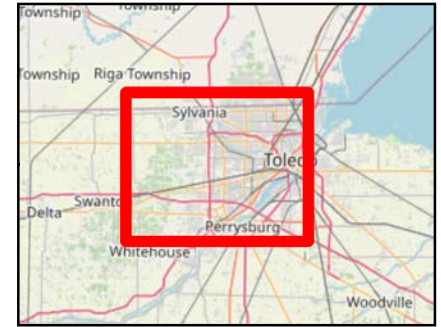
OCTOBER 2021
Fig03_Resources.mxd



STUDY AREA


OHIO EPA 401 WATER QUALITY CERTIFICATION FOR NATIONWIDE PERMIT ELIGIBILITY

- INELIGIBLE
- POSSIBLY ELIGIBLE
- ELIGIBLE



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**FIGURE 4
NATIONWIDE PERMITS
STREAM ELIGIBILITY MAP**



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Appendix B

Photographic Record

Client Name: ATSI, A First Energy Corporation	Site Location: City of Sylvania, Lucas County, Ohio	Project No. 429847.0017
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Photo No. 1.

Date:
10/14/2021

Description:
Photo facing east from western terminus of the Project Study Area.



Photo No. 2.

Date:
10/14/2021

Description:
Photo facing west toward western terminus of the Project Study Area.



Client Name: ATSI, A First Energy Company	Site Location: City of Sylvania, Lucas County, Ohio	Project No. 429847.0017.0000
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Photo No. 3.

Date:
10/14/2021

Description:
Photo facing west of Rule Out Point (ROP) Upland 1.



Photo No. 4.

Date:
10/14/2021

Description:
Photo facing west from middle of Project Study Area.



Client Name: ATSI, A First Energy Company	Site Location: City of Sylvania, Lucas County, Ohio	Project No.: 429847.0017.0000
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Photo No. 5.

Date:
10/14/2021

Description:
Photo of the Project Study Area facing east, north of the Toledo Memorial Park—cemetery’s wall. This photo shows the location of the pole relocation area.



Photo No. 6.

Date:
10/14/2021

Description:
Photo facing east toward eastern terminus of the Project Study Area.



Client Name: ATSI, A First Energy Company	Site Location: City of Sylvania, Lucas County, Ohio	Project No. 429847.0017.0000
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Photo No. 7.

Date:
10/14/2021

Description:
Photo facing west from eastern terminus of the Project Study Area.



Appendix C

Data Forms

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: Allen Junction-Westgate 138kV Relocation Project City/County: Sylvania/Lucas Sampling Date: October 14, 2021
 Applicant/Owner: ATSI, a FirstEnergy Corporation State: OH Sampling Point: Upland 1
 Investigator(s): Stacy Schimmoeller Section, Township, Range: S10 T9S R6E
 Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): Convex Slope (%): 3
 Subregion (LRR or MLRA): _____ Lat: 41.71544 Long: -83.69362 Datum: WGS84
 Soil Map Unit Name: Ottokee fine sand, 0-6% (OtB) NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

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

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, optional Wetland Site ID: _____
Remarks: (Explain alternative procedures here or in a separate report.) Community type: Select from list	
<p align="center">0 of 3 wetland criteria have been met. Area is not a wetland.</p>	

HYDROLOGY

Wetland Hydrology Indicators: Primary Indicators (minimum of one is required; check all that apply)	Secondary Indicators (minimum of two required)
<input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Aquatic Fauna (B13) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Marl Deposits (B15) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)
Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>N/A</u> Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>N/A</u> Saturation Present? (includes capillary fringe) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>N/A</u>	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available: <p>N/A</p>	
Remarks: <p>Wetland hydrology criterion has not been met.</p>	

VEGETATION – Use scientific names of plants.

Sampling Point: Upland 1

	Absolute % Cover	Dominant Species?	Indicator Status		
Tree Stratum (Plot size: <u>30 feet</u>)					
1. <u>Malus sylvestris</u>	<u>30</u>	<u>X</u>	<u>UPL</u>	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)	
2. <u>Picea abies</u>	<u>20</u>	<u>X</u>	<u>UPL</u>		
3. _____					
4. _____					
5. _____					
6. _____					
7. _____					
_____ = Total Cover				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = <u>1</u> FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species <u>97</u> x 4 = <u>388</u> UPL species <u>50</u> x 5 = <u>250</u> Column Totals: <u>147</u> (A) <u>638</u> (B) Prevalence Index = B/A = <u>4.34</u>	
Sapling/Shrub Stratum (Plot size: <u>15 feet</u>)					
1. _____					
2. _____					
3. _____					
4. _____					
5. _____					
6. _____					
7. _____					
_____ = Total Cover					
Herb Stratum (Plot size: <u>5 feet</u>)					
1. <u>Plantago lanceolata</u>	<u>2</u>		<u>FACU</u>	Hydrophytic Vegetation Indicators: <input type="checkbox"/> Rapid Test for Hydrophytic Vegetation <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.	
2. <u>Festuca rubra</u>	<u>15</u>		<u>FACU</u>		
3. <u>Poa pratensis</u>	<u>80</u>	<u>X</u>	<u>FACU</u>		
4. _____					
5. _____					
6. _____					
7. _____					
8. _____					
9. _____					
10. _____					
11. _____					
12. _____					
<u>97</u> = Total Cover					
Woody Vine Stratum (Plot size: <u>30 feet</u>)					
1. _____				Definitions of Vegetation Strata: Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height. Sapling/shrub – Woody plants less than 3 in. DBH and greater than 3.28 ft (1 m) tall. Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall. Woody vines – All woody vines greater than 3.28 ft in height.	
2. _____					
3. _____					
4. _____					
_____ = Total Cover				Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Remarks: (Include photo numbers here or on a separate sheet.)					
Hydrophytic vegetation criterion has not been met.					

SOIL

Sampling Point: Upland 1

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

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-9	10 YR 3/3	100					sandy loam	
9-18	10 YR 4/3	100					sandy loam	

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

Hydric Soil Indicators:

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)
- Dark Surface (S7) (LRR R, MLRA 149B)

- Polyvalue Below Surface (S8) (LRR R, MLRA 149B)
- Thin Dark Surface (S9) (LRR R, MLRA 149B)
- Loamy Mucky Mineral (F1) (LRR K, L)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)

Indicators for Problematic Hydric Soils³:

- 2 cm Muck (A10) (LRR K, L, MLRA 149B)
- Coast Prairie Redox (A16) (LRR K, L, R)
- 5 cm Mucky Peat or Peat (S3) (LRR K, L, R)
- Dark Surface (S7) (LRR K, L)
- Polyvalue Below Surface (S8) (LRR K, L)
- Thin Dark Surface (S9) (LRR K, L)
- Iron-Manganese Masses (F12) (LRR K, L, R)
- Piedmont Floodplain Soils (F19) (MLRA 149B)
- Mesic Spodic (TA6) (MLRA 144A, 145, 149B)
- Red Parent Material (F21)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

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

Restrictive Layer (if observed):

Type: None
 Depth (inches): N/A

Hydric Soil Present? Yes No

Remarks:
 Hydric soil criterion has not been met.