

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

LETTER OF NOTIFICATION

**ASHTABULA-PINNEY DOCK 138 KV TRANSMISSION
LINE PROJECT**

OPSB CASE NO.: 20-1432-EL-BLN

September 10, 2020

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

**LETTER OF NOTIFICATION
ASHTABULA-PINNEY DOCK 138 kV TRANSMISSION LINE 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 Letter of Notification application.

4906-6-05 (B): LETTER OF NOTIFICATION REQUIREMENTS

4906-6-05 (B)(1): Name

Name of Project: Ashtabula-Pinney Dock 138 kV Transmission Line Project
 (“Project”)

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to construct the Ashtabula-Pinney Dock 138 kV Transmission Line to connect a new interconnection customer, Petmin USA (“Petmin”). Petmin will be building a new Direct Reduced Iron Plant to be served by the ATSI 138 kV transmission system. The total length of the Project is approximately 1.7 miles.

The Project will be located in the City of Ashtabula and Ashtabula Township, Ashtabula County, Ohio. The new transmission line will be owned and operated by ATSI. Exhibits 1 and 2 show the General Location of the Project.

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

The Project meets the requirements for a Letter of Notification application because the Project is within the types of projects defined by Items (1)(b) and 1(d) (ii) of the

Application Requirement Matrix for Electric Power Transmission Lines. Appendix A of OAC Rule 4906-1-01. This items state:

- (1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*
 - (b) Lines greater than 0.2 miles in length but not greater than two miles in length.*
 - (d) Line(s) primarily needed to attract or meet the requirements of a specific customer or customers, as follows:*
 - (ii) Any portion of the line is on property owned by someone other than the specific customer or applicant.*

The proposed Project consists of approximately 1.7 miles of new 138kV transmission line which will be located in both new and existing right-of-way.

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

Petmin USA, a new interconnection customer, will be building a new Direct Reduced Iron (“DRI”) Plant to be served by the ATSI 138 kV transmission system in the City of Ashtabula, Ohio. The new facility will produce high quality pig-iron to be supplied to the region’s steel manufacturing facilities. The customer has selected a site approximately one (1) mile west of the existing ATSI Ashtabula South Substation. Per the customer’s request, the connection will require construction of a single 138 kV transmission line tap directly from the Ashtabula Substation to the customer’s Pinney Dock Substation.

The Project solution was presented at the PJM Subregional RTEP Committee-Western meeting on July 24, 2019 and assigned supplemental number s2064. The presentation slide is attached as Exhibit 4.

Please note that the installation of Structure #1, a take-off structure for the proposed new 138 kV transmission line, was part of a 2019 filing with the OPSB in Case No. 19-0580-EL-BNR, which was approved July 26, 2019. Construction on that project, including the take-off structure, was completed in October 2019.

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 transmission lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2020 Long-Term Forecast Report (“LTFR”). This map was submitted to the PUCO in Case No. 20-0657-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 location of the Ashtabula 138 kV Substation. The Project area is located approximately 2 1/2 inches (11” X 17” printed version) from the right edge of the map and 1/2 inches (11” X 17” printed version) from the top of the map. The general location and layout of the Project are shown in Exhibits 1, 2 and 3.

The Project is included in ATSI’s LTFR filed in 2020.

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

No alternatives were considered for this Project.

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

ATSI will issue a public notice in a newspaper of general circulation in the Project area within 7 days of filing this Letter of Notification application. The notice will comply with OAC Rules 4906-6-08(A) (1) through (6). In addition to the public notice, ATSI will mail letters explaining the Project to affected landowners and tenants within and contiguous to the planned Project area. ATSI has also established a Project website:

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

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

Finally, during all phases of this Project, ATSI will maintain the transmission projects hotline at 1-800-589-2837 and respond to questions submitted via email at: transmissionprojects@firstenergycorp.com. The public may use either the hotline or email to ask questions or leave comments on the Project for ATSI.

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

Construction on the Project is expected to begin as early as December 11, 2020 and be completed by June 30, 2021.

4906-6-05 (B)(6): 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, Ashtabula County, OH Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery.

4906-6-05 (B)(7): Property Owner List

The Project is located on new and existing right-of-way. The property information for this Project is listed below and was obtained through the Ashtabula County Auditor's website.

Table 1. List of Affected Property Owners

Parcel Number	Property Owner	Property Address	Easement Status
03-000-00-140-02	The Cleveland Electric & Illuminating Company	Lake Road East (SR 531) Ashtabula OH 44004	Owned in Fee
03-000-00-140-00	Energy Harbor	2133 Lake Road E. (SR 531) Ashtabula OH 44004	Will be Obtained
03-029-00-061-00	Coxon Investments LLC	Lake Road East (SR 531) Ashtabula OH 44004	Will be Obtained
03-014-00-031-00; 03-014-00-032-00	Roger L. & Victoria I. Frasure	1650 Lake SR 531 E Rd Ashtabula OH 44004	Will be Obtained
03-014-00-034-00; 05-502-90-014-00; 05-502-90-009-00;	Pinney Dock & Transport Company	Lake SR 531 E Rd Ashtabula OH 44004	Will be Obtained
03-014-00-036-03; 03-014-00-036-02	Lakeshore Pro-Realty LLC	Lake Rd SR 531 E Rd Ashtabula OH 44004	Will be Obtained

03-014-00-038-01	G. H. Oil Inc.	1540 Lake SR 531 E Rd Ashtabula OH 44004	Will be Obtained
03-024-00-020-00	Warner Realty & Inc.	Lake & Maruba Rd Ashtabula OH 44004	Will be Obtained
05-515-00-001-00; 05-515-00-027-00; 05-514-00-094-00 05-513-00-079-00; 05-513-00-077-00; 05-513-00-076-00	Ashtabula City	Lake Rd SR 531 Rd Ashtabula OH 44004	Will be Obtained
05-000-00-651-00	Pennsylvania Lines LLC	Penn RR, Bridge Street & Ore Storage Docks	Will be Obtained

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

4906-11-01 (C) (1): Operating Characteristics

The new Transmission Line will have the following characteristics:

Voltage: 138 kV

Conductor: 795 kcmil 26/7 ACSR

Static wire: 7#8 Alumoweld (Ashtabula Sub-Str 1, Str 30-Pinney Dock Sub)
SFPOC SFSJ-J-11393 - 48 Fiber OPGW (Structure 1-30)

Insulators: Polymer horizontal posts (wood tangent and light angle monopoles)
Polymer suspension (wood heavy angle monopoles)
Porcelain (Steel monopoles and wood deadend monopoles)

ROW Width: 65 feet

Structures: Exhibit 5: 138 kV Delta Single Wood Pole Structure
Exhibit 6: 138 kV Single Wood Pole Horizontal Post Structure
Exhibit 7: 138 kV Single Wood Pole Suspension Structure
Exhibit 8: 138 kV Single Wood Pole Strain Structure
Exhibit 9: 138 kV Single Wood Pole Deadend Structure
Exhibit 10: 138 kV Single Wood Pole Horizontal Post Structure
with Guying
Exhibit 11: 138 kV Steel Monopole Deadend Structure
Exhibit 12: 138 kV Steel Monopole Horizontal Post Structure
Exhibit 13: 138 kV Steel Monopole Suspension Structure

The proposed Project will be located on new and existing transmission line right-of-way.

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

There are ten (10) occupied residence or institution within 100 feet of the centerline of the proposed Project. The closest occupied residence or institution is approximately 50 feet from the proposed Project centerline. Therefore, Electric and Magnetic Field (“EMF”) calculations are provided below.

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

Table 2 itemizes the estimated line loading of the Ashtabula-Pinney Dock 138 kV Transmission Line. The normal line loading represents FirstEnergy’s peak system load for the transmission lines. 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 0 °C (32 °F), wind speed of 1.3 miles per hour, and a circuit design operating temperature of 100 °C (212 °F).

Table 2: Transmission Line Loading

Line Name	Normal Loading Amps	Emergency Loading Amps	Winter Rating Amps
Ashtabula-Pinney Dock 138 kV Transmission Line	338.4	338.4	1320

Tables 3 and 4 provide an approximation of the magnetic and electric fields strengths of the Ashtabula-Pinney Dock 138 kV Transmission Line for two different structural configurations found in the Project. The configurations are angle structure to tangent structure, and tangent structure to tangent structure. All configurations are calculated in an average 65-foot wide right-of-way. The calculations provide an approximation of the electric and magnetic fields 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. Also, a balanced, three-phase circuit loading is assumed for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission lines.

**Table 3: EMF Calculations for Ashtabula-Pinney Dock 138 kV Transmission Line:
Angle to Tangent**

Ashtabula-Pinney Dock 138 kV Transmission Line, Angle Structure to Tangent Structure		Electric Field (kV/m)	Magnetic Field (mG)
Normal Loading	Under Lowest Conductors	1.762	47.05
	At Right-of-Way Edges	0.255 / 0.325	17.59 / 19.55
Emergency Loading	Under Lowest Conductors	1.762	47.05
	At Right-of-Way Edges	0.255 / 0.325	17.59 / 19.55
Winter Rating	Under Lowest Conductors	1.762	183.51
	At Right-of-Way Edges	0.255 / 0.325	68.61 / 78.75

**Table 4: Calculations for Ashtabula-Pinney Dock 138 kV Transmission Line:
Tangent to Tangent**

Ashtabula-Petmin 138 kV Transmission Line, Tangent Structure to Tangent Structure		Electric Field (kV/m)	Magnetic Field (mG)
Normal Loading	Under Lowest Conductors	0.446	12.74
	At Right-of-Way Edges	0.259 / 0.317	8.56 / 9.38
Emergency Loading	Under Lowest Conductors	0.446	12.74
	At Right-of-Way Edges	0.259 / 0.317	8.56 / 9.38
Winter Rating	Under Lowest Conductors	0.446	49.70
	At Right-of-Way Edges	0.259 / 0.317	33.38 / 35.96

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, for multiple circuit transmission lines, 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 design a compact configuration of single circuit single pole tangent and angle structures 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 \$3,390,000 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 Ashtabula and Ashtabula Township in Ashtabula County, Ohio. There are various land uses along the route of the line, mainly include heavy manufacturing/heavy industrial although some low density residential and general business uses do exist along the route. Based on the U.S. Bureau of Census estimates, the 2018 population of Ashtabula Township was 19,894, the 2020 population of the City of Ashtabula is 17,845. Based on the U.S. Bureau of Census estimates, the 2019 population of Ashtabula County was 97,241. No significant changes or impacts to the current land use is anticipated.

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

Agricultural land use does not exist within the Project limits.

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

A search of Ohio Historic Preservation Office's ("OHPO") National Register of Historic Places ("NRHP") online database was conducted to identify the existence of any significant archaeological or cultural resource sites within 0.5 mile of the Project area. A map of the results of the search is shown in Exhibit 14. The OHPO database includes all Ohio listings on the National Register of Historic Places ("NRHP"), including districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

The results of the search indicate that three (3) listed NRHP site and two (2) listed eligible NRHP sites were identified within 0.5 mile of the Project's potential disturbance area. Table 5 lists the NRHP sites, Table 6 lists the eligible NRHP sites.

The nearest NRHP site is located approximately 0.20 mile away from the proposed Project. NRHP site will not be impacted by the proposed Project.

The OHPO database also includes listing of the Ohio Archaeological Inventory (“OAI”), the Ohio Historic Inventory (“OHI”), previous historical and cultural resource surveys, the Ohio Genealogical Society (“OGS”) cemetery inventory, and historic tax credit projects. There are no OAI listed archeological resource sites have been previously inventoried within 0.5 mile of the Project. Eleven (11) historical structural resources are located within 0.5 mile of the Project area and are listed in Table 7.

The closest historical structural resource is approximately 0.08 mile (425 feet) away from the proposed Project. Two (2) previous Phase I archaeological resource surveys were conducted and are listed in Table 8. One (1) NR boundaries district is located within 0.5 mile of the Project area and is listed in Table 9. The closest NR boundaries to the proposed Project is approximately 0.40 mile away. Two (2) historic tax credit projects were proposed within 0.5 mile of the Project area and are listed in Table 10. The closest historic tax credit project to the proposed Project is approximately 0.55 mile away. No OSG cemeteries are located within 0.5 mile of the Project area.

Table 5: List of National Historic Registered Places				
Resource Name	Address	City	County	Applicable Criteria 1 and 2
West Fifth Street Bridge	SR 531 over Ashtabula River	Ashtabula	Ashtabula	Architecture/ Engineering
Cahill, Michael, House	1106 Walnut Blvd	Ashtabula	Ashtabula	Architecture/ Engineering
Ashtabula Harbour Commercial District	Both sides of W 5th St from 1200 block to Ashtabula River	Ashtabula	Ashtabula	Event/Architecture/ Engineering

Table 6: List of Eligible National Historic Registered Places				
Resource Name	Address	City	County	Eligibility
Woodland Wind LLC	1181 Harmon Rd	Ashtabula	Ashtabula	YC
N/A	Spans the Ashtabula River within the city limits	Ashtabula	Ashtabula	YES

Table 7: List of OHI Listed Structural Resources				
OHI Number	Name	Historic Use	County	Municipal ity
ATB0009203	ConRail Freight Office/JM Tower	Rail Related	Ashtabula	Ashtabula
ATB0025203	Ashtabula Generating Plant AB	Energy Facility	Ashtabula	Ashtabula
ATB0025303	Ashtabula C Generating Plant	Energy Facility	Ashtabula	Ashtabula
ATB0025503	Goodwill Building/ Christensens Soda Bar		Ashtabula	Ashtabula
ATB0026403	Lakeshore Park Pavillion		Ashtabula	Ashtabula
ATB0003803	Great Lakes/USCG Mem Marine Museum/Boys Club Home		Ashtabula	Ashtabula
ATB0007603	Leona Robertson House	Residential Domestic	Ashtabula	Ashtabula
ATB0007703	Paul Goode House/Captain Myers House	Single Dwelling	Ashtabula	Ashtabula
ATB0008103	St Nicholas Hall/ Hungarian Lodge		Ashtabula	Ashtabula
ATB0008203	Josephine Renzetti Estate	Retail Store/Shop	Ashtabula	Ashtabula
ATB0008303	Frank Campisano House	Single Dwelling/ Carriage House/Garage	Ashtabula	Ashtabula

Table 8: List of Previous Historic and Cultural Resource Surveys				
Type	Year	Name/Title	County	Municipality
Phase I	2005	Phase I Archaeological Survey for the Former United States Coast Guard Station Ashtabula, Ashtabula County, Ohio	Ashtabula	Ashtabula
Phase I	2005	A Phase I Archaeological Survey of Approximately 45 Acres for the Proposed Location of the Ashtabula Industrial Park in Ashtabula, Ashtabula Township, Ashtabula County, Ohio	Ashtabula	Ashtabula

Table 9: NR Boundaries			
District Name	Number of Properties	County	Municipality
Ashtabula Harbour Commercial District	25	Ashtabula	Ashtabula

Table 10: Historic Tax Credit Projects				
Control Number	Property Name	Address	County	Municipality
3469	N/A	1023 Bridge Street	Ashtabula	Ashtabula
34	Michael Cahill House	1106 Walnut Boulevard	Ashtabula	Ashtabula

In addition, a cultural resources literature review of the Project area was conducted in April 2020 by Jacobs Engineering Group, Inc. (Jacobs) of Cincinnati, Ohio, a qualified consultant. Based on the literature review, Jacobs recommended additional cultural resources investigations be conducted within the Project area. The Jacobs Cultural Resources Literature Review report is provided in Appendix A.

Following the recommendation of Jacobs, the Phase I archaeological reconnaissance and architectural and historical resources surveys were conducted from August 17 through 19, 2020. No new archaeological resources were identified. Twenty-three new historical resources were identified during the architectural and historical resources survey. None of the new historical resources are recommended eligible for the NRHP. No further cultural resources work is recommended. The Phase I archaeological report and architectural and historical resources reports will be submitted to OHPO for review and concurrence.

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

The Project will require the development of a Storm Water Pollution Prevention Plan (SWPPP), because planned earthwork will include the disturbance of more than 1 acre. This plan will be developed in accordance with the Ohio Environmental Protection Agency (OEPA) National Pollution Discharge Elimination System (NPDES) General Permit OCH000004 – Stormwater Discharges Associated with Construction Activity (General Permit). Submittal of a Notice of Intent (NOI) to the OEPA is required for coverage under the General Permit. Consultation with appropriate county officials will be conducted if warranted during the development of the SWPPP to ensure compliance with any county regulations.

Temporary impacts to wetlands and streams have been minimized to the maximum extent practicable. Permanent impacts to delineated wetlands as a result of structure placement will not exceed thresholds that would require pre-construction authorization from the U.S. Army Corps of Engineers. No delineated wetlands or streams will be

permanently impacted by construction activities. Therefore, the Project will not require pre-construction authorization pursuant to Section 404 of the Clean Water Act or a Section 401 Water Quality Certification from the OEPA. There are no additional known local, state, or federal requirements that must be met prior to commencement of construction on the Project.

Table 11 shows the list of government agency requirements and the application status at the time of filing.

Table 11. List of Government Agency Requirements to be Secured Prior to Construction

Agency	Permit Requirement	Status
Ohio Environmental Protection Agency (OEPA)	General NPDES Construction Storm Water Permit	Will be Filed
Ashtabula County, Ohio, Soil and Water Conservation District, City of Ashtabula and Ashtabula Township	Storm Water Pollution Prevention Plan (SWPPP) – Review Application	Will be Filed

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

As part of the investigation, a request was submitted to the Ohio Department of Natural Resources-Division of Wildlife (“ODNR”) to research the presence of any endangered, threatened, or rare species within the Project area. The ODNR response received on June 1, 2020, is attached as Exhibit 15.

The ODNR response indicated that the Project is within the range of the federally and state endangered Indiana Bat (*Myotis sodalis*).

The ODNR’s response also indicated records of the following aquatic species within one mile of the Project area:

- Great lakes crayfish (*Orconectes propinquus*) - state species of concern.
- Channel Darter (*Percina copelandi*) - state threatened fish.
- Longnose dace (*Rhinichthys cataractae*) - state species of concern.
- Clubshell (*Pleurobema clava*) – state endangered and federally endangered mussle.
- Snuffbox (*Epioblasma triquetra*) - state endangered and federally endangered mussle.

- Black sandshell (*Ligumia recta*) - state threatened mussle.
- Northern brook lamprey (*Ichthyomyzon fossor*) – state endangered fish
- Tiger beetle (*Cicndela hirticollis hirticollis*) - state threatened species.

The ODNR comments indicate that the Project is not likely to impact these species due to location, and that no in-water work is proposed in a perennial stream.

The ODNR’s response also indicated records of the following plant species within one mile of the Project area:

- American Beach Grass (*Ammophila breviligulata*) – state threatened species.
- Bearberry (*Arctostaphylos uva-ursi*) – state endangered species.
- Schweinitz’ umbrella sedge (*Cyperus schweinitzii*) - state threatened species.
- Seaside spurge (*Euphorbia polygonifolia*) – state potentially threatened species.
- Alpine rush (*Juncus alpinoarticulatus*) - state threatened species.
- Inland beach pea (*Lathyrus japonicas*) - state threatened species.
- Deer’s-tongue arrowhead (*Saggitaria rigida*) - state potentially threatened species.
- Beach Dune Plant Community

The ODNR’s response also indicated records of the following reptile species within one mile of the Project area:

- Eastern massasauga (*Sistrurus catinatus*) - state endangered species and a federally threatened snake species.
- Smooth greensnake (*Opheodrys vernalis*) - state endangered species.
- Spotted Turtle (*Clemmys guttata*) - state threatened species.

The ODNR comments indicate that this Project is not likely to impact any of these species due to location, the type of habitat in the Project area and its surroundings and the type of work proposed,

The ODNR’s response also indicated records of the following bird species within one mile of the Project area:

- Northern harrier (*Circus cyaneus*) - state endangered bird.
- Upland Sandpiper (*Bartramia longicauda*) - state endangered bird.

The ODNR's comments indicate that if the habitat will not be impacted, the Project is not likely to impact these species. The lack of expansive grasslands and given developed surroundings (i.e. within Ashtabula City limits, near residential and commercial properties, proximity to roadways and railway, and regular mowing occurring along the project route), it is unlikely that these species inhabit areas along the Project area. Concurrence in this regard is being sought from ODNR and will be provided to OPSB once received.

The ODNR's response also indicated that the Project area is within the range of the Kirtland's Warbler (*Setophaga kirtlandii*) state endangered bird¹ and the Piping Plover (*Charadrius melodus*), a state endangered and federally endangered bird. These species do not nest in the state but do utilize stopover habitat as they migrate through the region. ODNR indicated that since no tree removal was proposed, the Project is not likely to impact these species. However, it has since been determined that some tree clearing will be required to facilitate the Project. This tree clearing will occur in December 2020. As the Piping Plover migrates in March² and Kirtland's Warbler in early Spring³, the Project is not anticipated to negatively affect these species.

As part of the investigation, a request for comments was submitted to the United States Fish and Wildlife Services ("USFWS"). The USFWS's April 14, 2020 response is attached as Exhibit 16.

The USFWS response indicates that due to the Project type, size and location there are no adverse effects anticipated to federally endangered, threatened, proposed, or candidate species.

¹ Kirtland's Warbler federally delisted as of October 2019.

² <https://www.fws.gov/Midwest/endangered/birds/Kirtland/index.html>

³ <https://www.fws.gov/verobeach/MSRPPDFs/Kirtlandswarbler.pdf>

³ <https://www.fws.gov/verobeach/MSRPPDFs/Kirtlandswarbler.pdf>

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

As part of the investigation, a request was submitted to the ODNR to research the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. The ODNR's June 1, 2020 response, attached as Exhibit 15, indicated that there is one (1) conservation area and one (1) plant community within one (1) mile of the Project area. The conservation area is Walnut Beach Conservation Site and the plant community is Beach dune plant community. The Project area is approximately 0.7 mile away from the nearest part of Walnut Beach Conservation Site and there are no beach dunes located within the Project area. No impacts are expected to the either of these features as a result of the Project due to proximity and/or from the Project area.

As part of the investigation, a request was submitted to the United States Fish and Wildlife Services ("USFWS") to research the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. The USFWS's April 14, 2020 response, attached as Exhibit 16, indicated that there are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project area.

Additionally, the USFWS's response indicated that there are no records of any areas of ecological concern within one (1) mile of the proposed Project area.

As part of the investigation, ATSI hired Jacobs Engineering Group, Inc. ("Jacobs") to conduct a wetland and stream assessment of the Project area. The Jacobs investigation focused on an approximately 21-acre study area around the proposed Project centerline, access roads and additional workspace areas.

During the study, Jacobs identified 4 PEM Category 1 wetlands within the study area, Table 12 shows the list of delineated wetlands. No streams or ponds were identified

within the Project survey corridor. A map of the delineated wetland and streams is shown in Appendix B, the Ashtabula-Pinney Dock 138 kV Transmission Line Project Access Map.

Table 12. Detailed Delineated Wetland Table

Wetland ID	Location		Wetland Type ¹	Area (ac) ²	ORAM Score/Category
	Latitude	Longitude			
Wetland AP-01	41.90549	-80.77189	PEM	0.20	11.5/Category 1
Wetland AP-02	41.90426	-80.77462	PEM	0.19	19/Category 1
Wetland AP-03	41.90309	-80.77687	PEM	0.07	14.5/Category 1
Wetland AP-04	41.90182	-80.78871	PEM	0.13	20.5/Category 1
WETLAND ACREAGE WITHIN STUDY AREA				0.59	
¹ Cowardin et al. 1979.					
² This acreage only corresponds to the area delineated within the environmental survey area.					

Structure placement has been designed to avoid permanent wetland impacts. The few structures that will be placed in the delineated wetlands (Wetland AP-03) are wooden poles and are therefore, not considered fill material per Section 404 of the Clean Water Act. No fill material will be placed in a jurisdictional wetland or stream. A construction access plan has been developed to avoid or minimize the temporary disturbance of jurisdictional wetland and streams to the maximum extent practicable by utilizing existing access routes throughout the Project area. If any streams or wetlands must be crossed during construction, appropriate Best Management Practices (“BMPs”) such as temporary bridging with construction matting, will be implemented to avoid impacts. All construction activities will be implemented in accordance with all relevant construction storm water permit requirements. All applicable permits will be secured before construction.

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 edition of the National Electrical Safety Code as adopted by the PUCO and will meet all applicable safety standards established by the Occupational Safety and Health Administration.

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

4906-6-07: Documentation of Letter of Notification Transmittal and Availability for Public Review

This Letter of Notification application is being provided concurrently to the following officials of the City of Ashtabula, Ashtabula Township and Ashtabula County, Ohio.

Ashtabula County

Mr. Casey R. Kozlowski,
Board President
Ashtabula Co. Commissioners
25 West Jefferson Street
2nd Floor Old Courthouse
Jefferson, OH 44047

Ms. Janet Discher,
Ashtabula County Administrator
Ashtabula Co. Commissioners
25 West Jefferson Street
2nd Floor Old Courthouse
Jefferson, OH 44047

Ms. Kathryn L. Wittington,
Board Vice-President
Ashtabula Co. Commissioners
25 West Jefferson Street
2nd Floor Old Courthouse
Jefferson, OH 44047

Ms. Janice Switzer, Director
Ashtabula County Community
Services and Planning
25 West Jefferson Street
1st Floor Old Courthouse
Jefferson, OH 44047

Mr. J. P. Ducro IV,
Ashtabula County Commissioner
25 West Jefferson Street
2nd Floor Old Courthouse
Jefferson, OH 44047

Mr. Tim Martin, P.E., P.S.
Ashtabula County Engineer
186 East Satin Street
Jefferson, OH 44047

City of Ashtabula

Mr. John S. Roskovics,
President of Council
City of Ashtabula
2629 Arlington Ave.
Ashtabula, OH 44004

Mr. James M. Timonere
Ashtabula City Manager
4717 Main Avenue
Ashtabula, OH 44004

Mr. Michael D. Speelman
Vice President of Council
City of Ashtabula
4312 Valleyview Blvd.
Ashtabula, OH 44004

Ms. Traci Welch
Finance Director,
City of Ashtabula
4717 Main Avenue
Ashtabula, OH 44004

Ashtabula Township

Mr. Steve McClure, Chairman
Trustee, Ashtabula Township
2718 North Ridge Road East
Ashtabula, OH 44004

Mr. Joseph J. Pete
Trustee, Ashtabula Township
2718 North Ridge Road East
Ashtabula, OH 44004

Ms. Bambi Paulchel,
Vice-Chairman
Trustee, Ashtabula Township
2718 North Ridge Road East
Ashtabula, OH 44004

Mr. Robert S. Dille
Fiscal Officer,
Ashtabula Township
2718 North Ridge Road East
Ashtabula, OH 44004

Libraries

Mr. Joe Zappitello, Director
Harbor-Topky Memorial Library
1633 Walnut Boulevard
Ashtabula, OH 44004

Mr. William J. Tokarczyk,
Director
Ashtabula County District Library
4335 Park Avenue,
Ashtabula, OH 44004

Copies of the transmittal letters to these officials have been included with this Letter of Notification application to the Ohio Power Siting Board and are being provided to meet the requirement of OAC 4906-6-07 (B) to provide the OPSB with proof of compliance with the notice requirement to local officials in OAC 4906-6-07 (A)(1) and to libraries at OAC 4906-6-07 (A)(2).

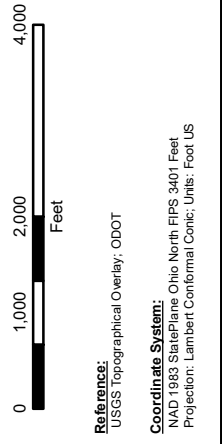
Information is posted on www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Letter of Notification application. The link to website is being provided to meet the requirement of OAC 4906-6-07 (B) and to provide the OPSB with proof of compliance with the notice requirements in OAC 4906-6-07 (A)(3).



FirstEnergy

EXHIBIT 1

Ashtabula-Pinney Dock 138 kV Transmission Line Project



- LEGEND:**
- ▲ Substation
 - Proposed Ashtabula-Petmin 138 kV Transmission Line
 - Other 138 & 345 kV Transmission Lines
 - Roads

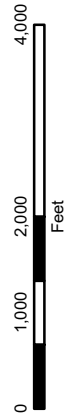


FirstEnergy

EXHIBIT 2

Ashtabula-Pinney Dock 138 kV Transmission Line Project

LAKE ERIE

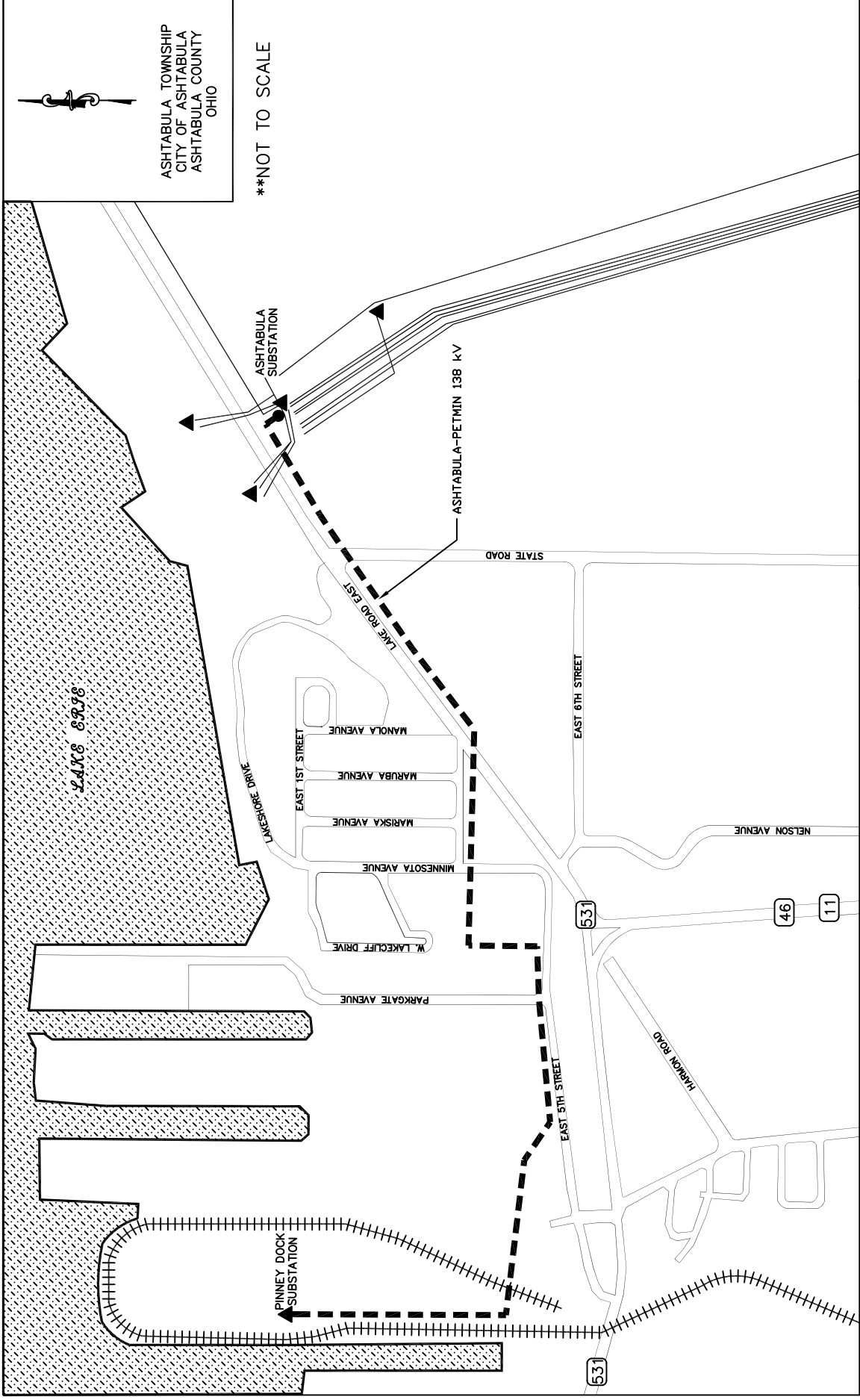


Reference:
ESRI Imagery; ODOT

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

LEGEND:

- ▲ Substation
- Proposed Ashtabula-Petmin 138 kV Transmission Line
- Other 138 & 345 kV Transmission Lines
- Roads



LEGEND

- | | | | |
|-------|--|-------|--------------------|
| — | EXISTING CONDUCTOR | +++++ | RAILROAD |
| - - - | NEW CONDUCTOR | — | EXISTING ROADS |
| ● | EXISTING SINGLE STEEL MONOPOLE STRUCTURE | | EXISTING POND/LAKE |
| ▲ | SUBSTATION | | |



ASHTABULA—PINNEY DOCK 138 kV
TRANSMISSION LINE PROJECT

GENERAL LAYOUT

EXHIBIT 3

ASHTABULA TOWNSHIP
CITY OF ASHTABULA
ASHTABULA COUNTY
OHIO

**NOT TO SCALE



ATSI Transmission Zone M-3 Process
New 138 kV Service Connection - Solution

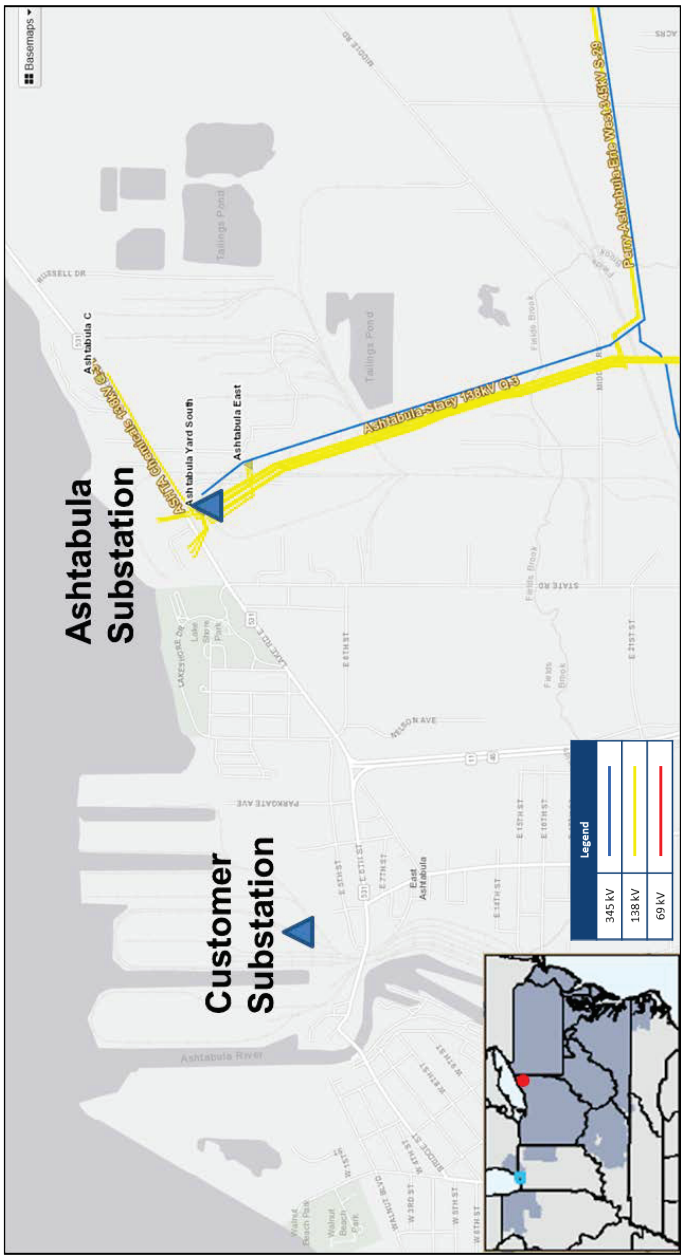
Need Number: ATSI-2019-057
Process Stage: Solutions Meeting – 07/24/2019
Previously Presented: Need Meeting – 05/20/2019

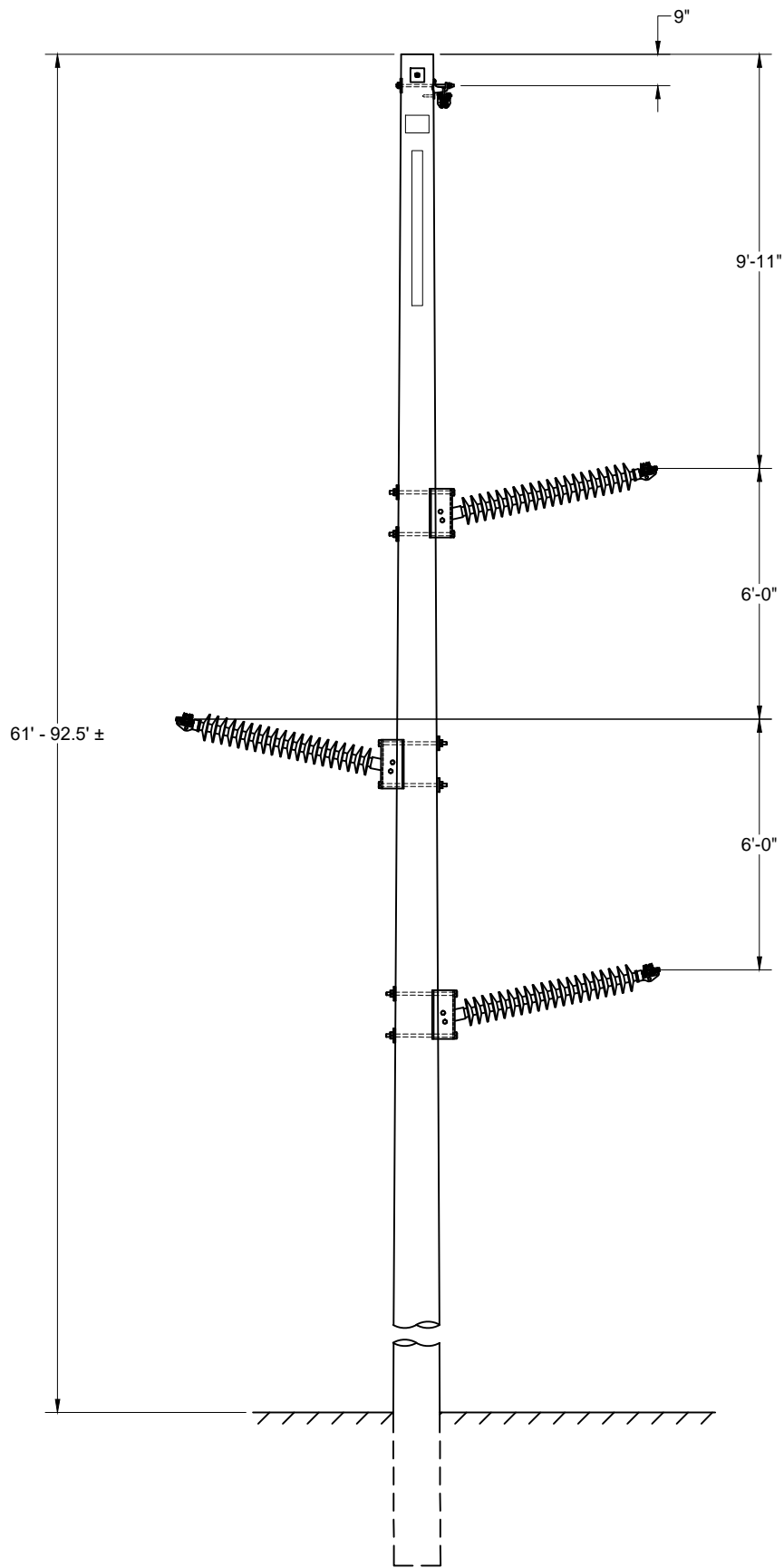
Supplemental Project Driver(s):
Customer Service

Specific Assumption Reference(s)
New customer connection request evaluated per FirstEnergy’s “Requirements for Transmission Connected Facilities” document and “Transmission Planning Criteria” document.

Problem Statement
New Customer Connection - A customer requested 138 kV transmission service approximately 75 MVA of load be connected to the Ashtabula 138 kV substation, approximately 1.7 miles from the customer substation.

Requested In-Service Date: 06/01/2020



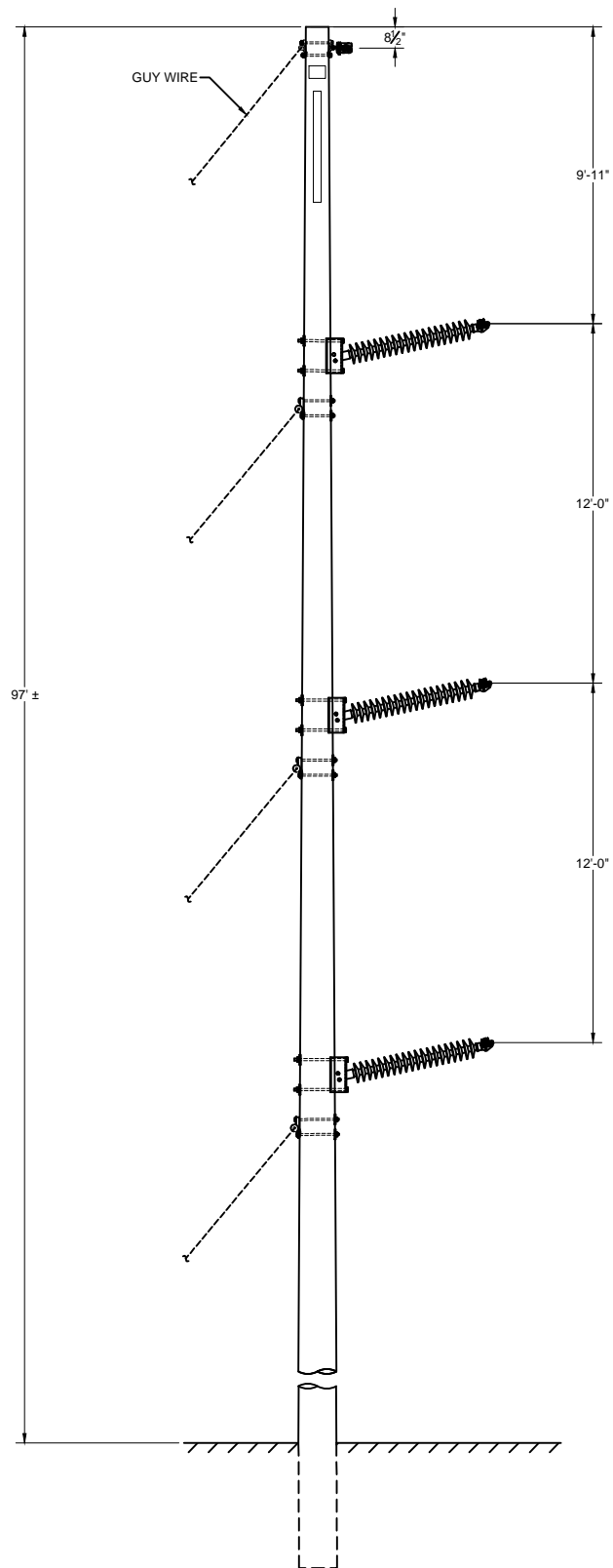


ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

WOOD HORIZONTAL POST DELTA
TYPICAL 138kV STRUCTURE

EXHIBIT 5

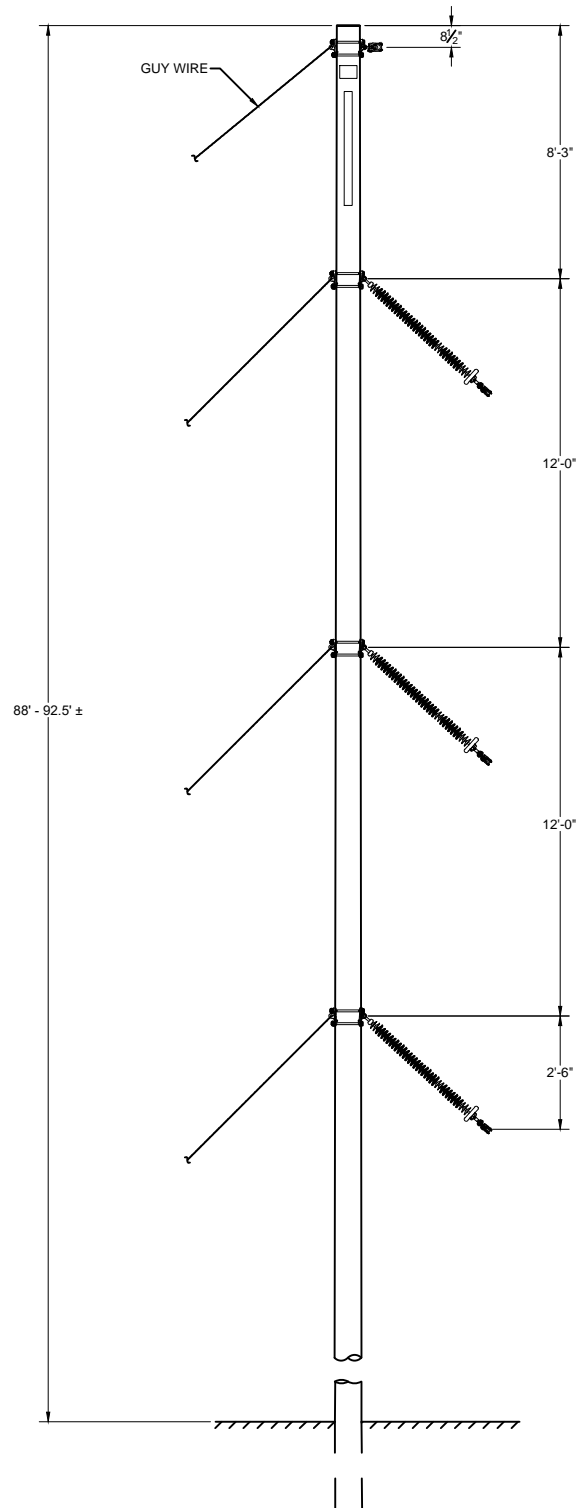
SCALE: N.T.S.



SCALE: N.T.S.

ASHTABULA-PINNEY DOCK 138kV TRANSMISSION LINE PROJECT
WOOD HORIZONTAL POST VERTICAL TYPICAL 138kV STRUCTURE

EXHIBIT 6

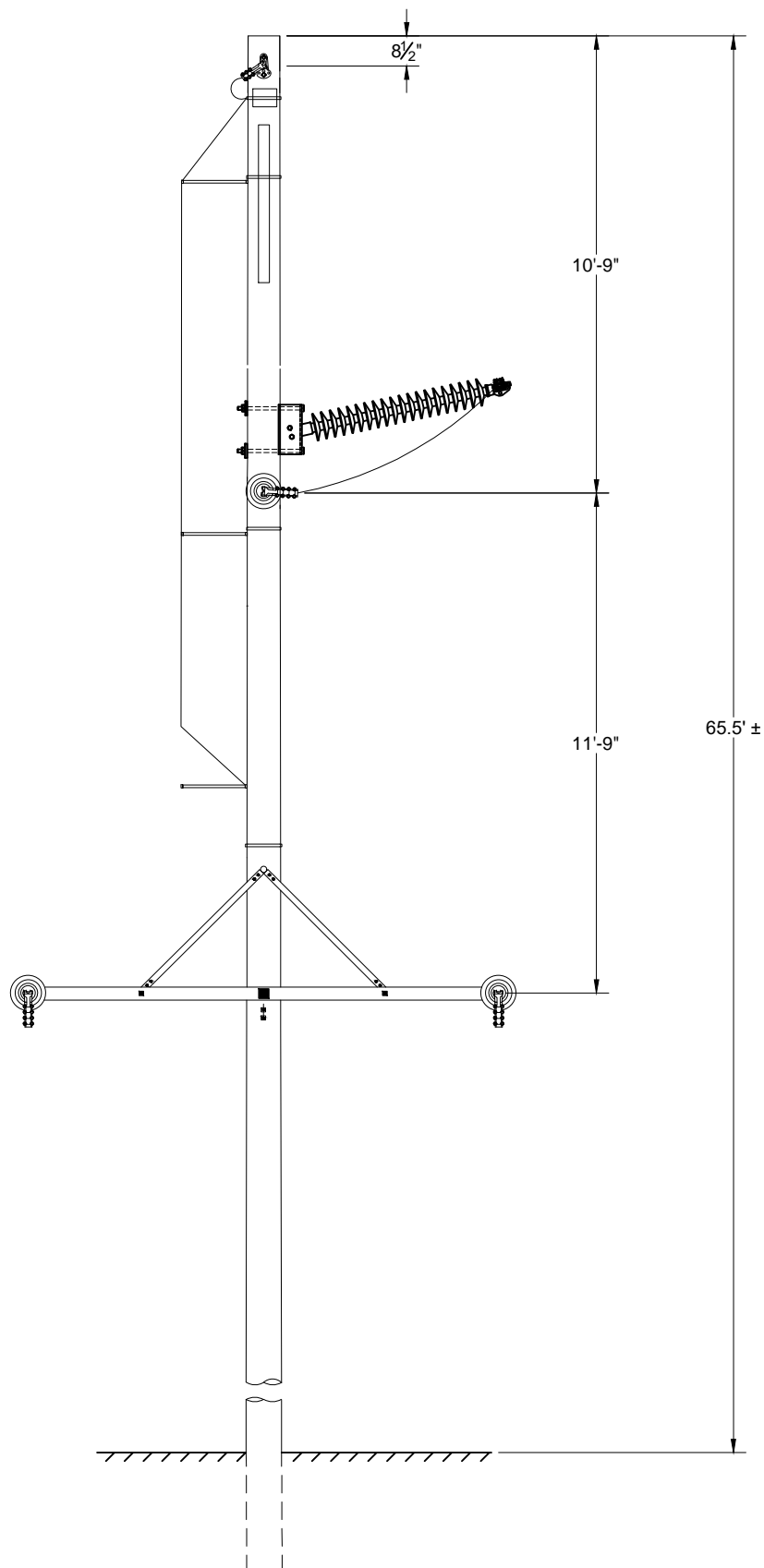


SCALE: N.T.S.

ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

WOOD SUSPENSION VERTICAL
TYPICAL 138kV STRUCTURE

EXHIBIT 7

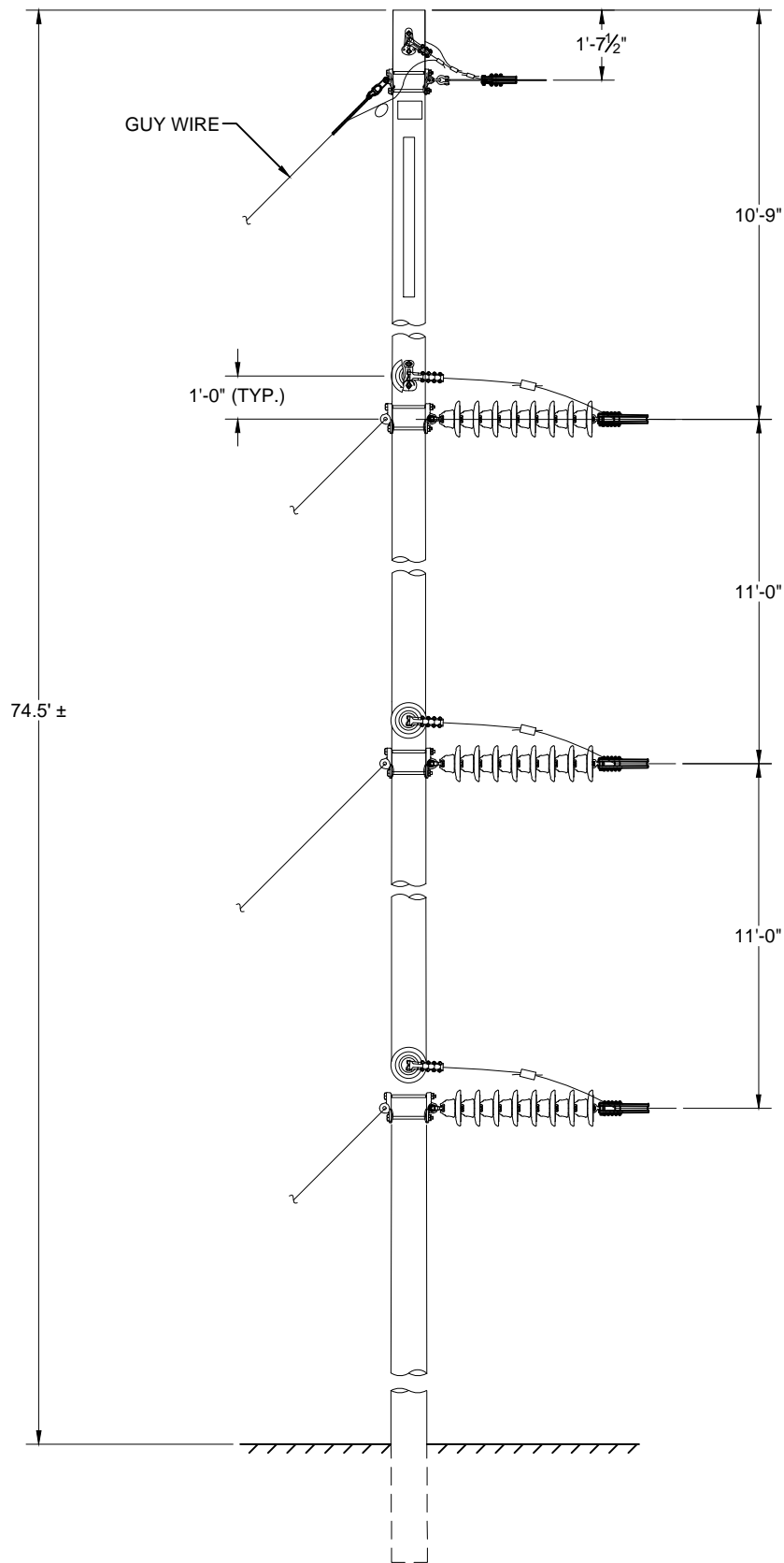


ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

WOOD DELTA INLINE STRAIN
TYPICAL 138kV STRUCTURE

EXHIBIT 8

SCALE: N.T.S.

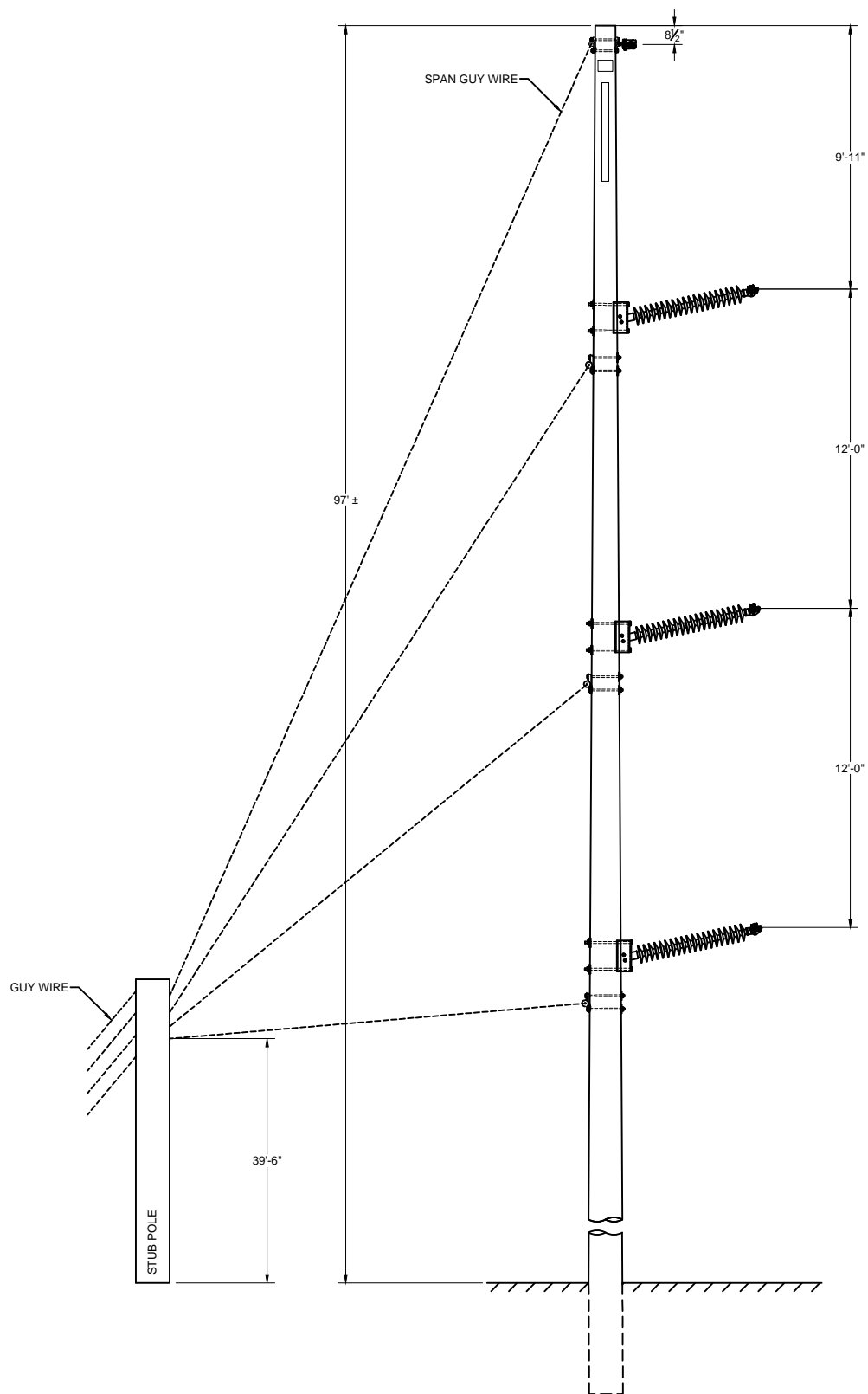


ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

WOOD DEADEND VERTICAL
TYPICAL 138kV STRUCTURE

EXHIBIT 9

SCALE: N.T.S.

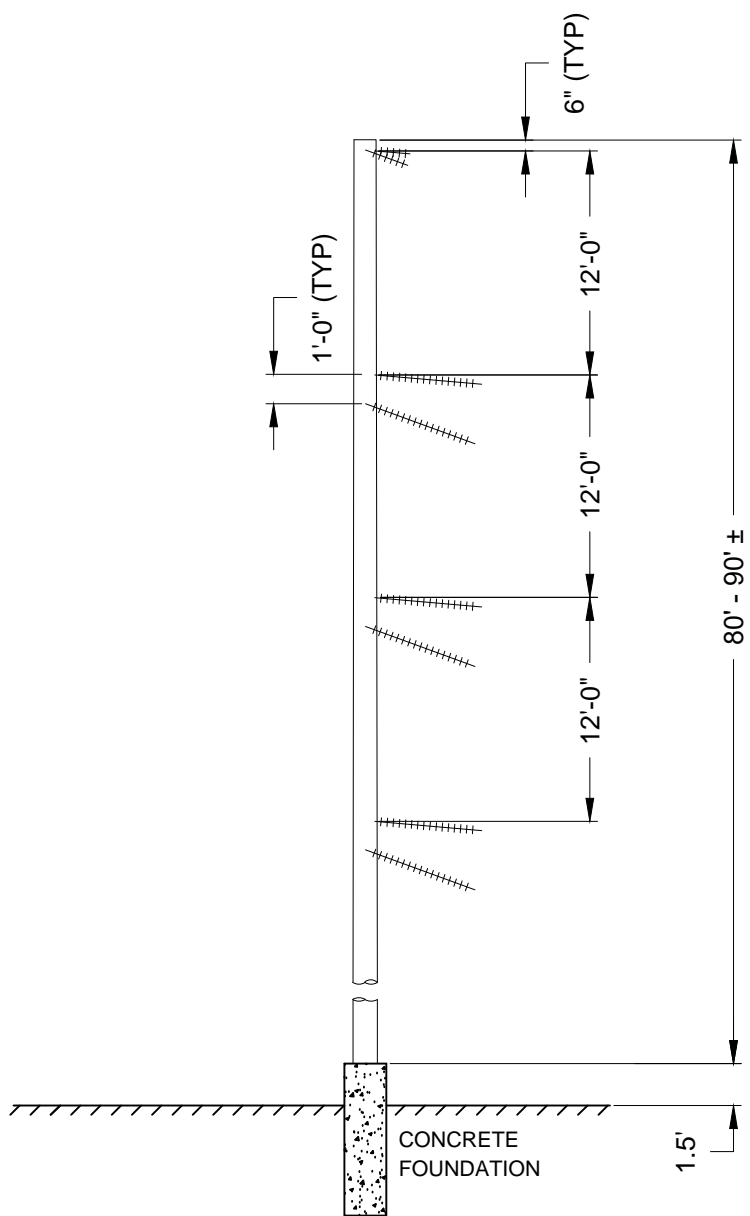


SCALE: N.T.S.

ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

WOOD HORIZONTAL POST VERTICAL
TYPICAL 138kV STRUCTURE

EXHIBIT 10

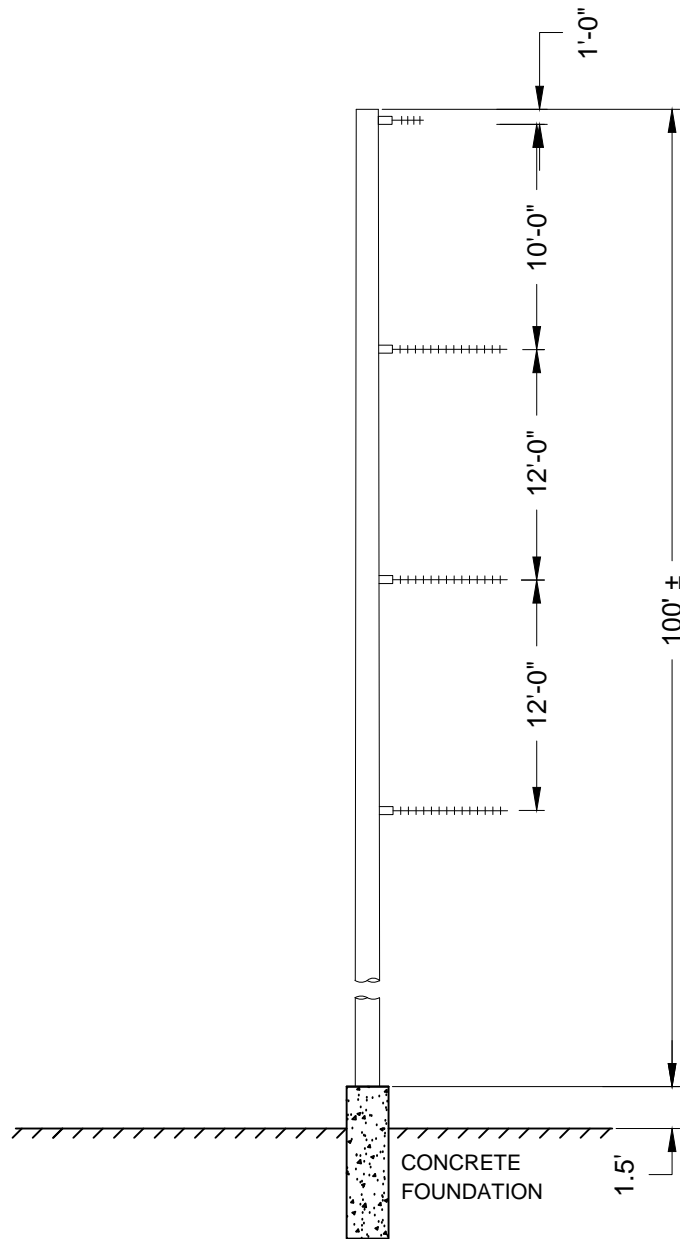


ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

STEEL DEADEND
TYPICAL 138kV STRUCTURE

EXHIBIT 11

SCALE: N.T.S.

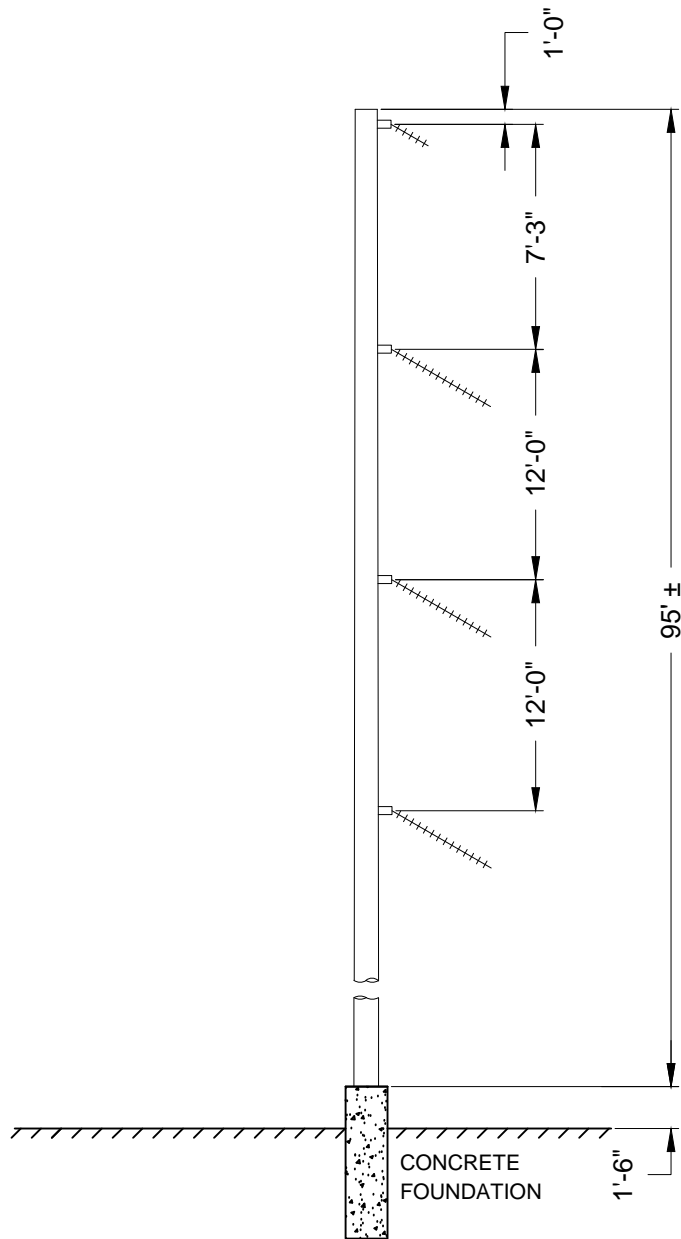


SCALE: N.T.S.

ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

STEEL HORIZONTAL POST
TYPICAL 138kV STRUCTURE

EXHIBIT 12



ASHTABULA-PINNEY DOCK
138kV TRANSMISSION LINE PROJECT

STEEL SUSPENSION
TYPICAL 138kV STRUCTURE

EXHIBIT 13

SCALE: N.T.S.

Legend

- NR Listings**
- Listed
 - National Historic Landmark
 - Delisted
- NR Determinations of Eligibility**
- Historic Structures
 - Historic Bridges
 - Historic Tax Credit Projects
 - OGS Cemeteries
- Confident**
- Not Confident
- Historic Markers**
- Dams
 - UTM Zone Split
 - NR Boundaries
 - Phase1
 - Phase2
 - Phase3

0 0.32 0.63 Miles

1: 25,000

Copyright/Disclaimer

This map is a user generated static output from an Internet mapping site and is for general use. This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

Datum: [Datum]
Projection: WGS_1984_Web_Mercator_Auxiliary
_Sphere





Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief

2045 Morse Road – Bldg. E-2

Columbus, OH 43229

Phone: (614) 265-6621

Fax: (614) 267-4764

June 1, 2020

Brian Robertson
Jacobs
400 E. Business Way, Suite 400
Cincinnati, Ohio 45241

Re: 20-385; ATSI -Ashtabula-Petmin 138 kV Transmission Line Project

Project: The proposed project involves the construction of approximately 1.75 miles of new double circuit line and establishment of a new 100-foot-wide right-of-way.

Location: The proposed project is located in Ashtabula Township, and crosses into the City of Ashtabula, Ashtabula 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 records at or within a one-mile radius of the project area:

American beach grass (*Ammophila breviligulata*), T
Bearberry (*Arctostaphylos uva-ursi*), E
Schweinitz' umbrella-sedge (*Cyperus schweinitzii*), T
Seaside spurge (*Euphorbia polygonifolia*), P
Alpine rush (*Juncus alpinoarticulatus*), T
Inland beach pea (*Lathyrus japonicas*), T
Deer's-tongue arrowhead (*Sagittaria rigida*), P
Beach dune plant community
Great lakes crayfish (*Orconectes propinquus*), SC
Channel darter (*Percina copelandi*), T
Longnose dace (*Rhinichthys cataractae*), SC
Tiger beetle (*Cicindela hirticollis hirticollis*), T
Walnut Beach Conservation Site

The review was performed on the project area you specified in your 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.

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; A = species recently added to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

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

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

The project is within the vicinity of records for the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. Presence of the Indiana bat has been established in the area, and therefore additional summer surveys would not constitute presence/absence in the area. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, and the black sandshell (*Ligumia recta*), a state threatened mussel. The DOW understands that there is no in-water work proposed for this project. Therefore, this project is not likely to impact these or other mussel species.

The project is within the range of the northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, and the channel darter (*Percina copelandi*), a state threatened fish. The DOW understands that there is no in-water work proposed for this project. Therefore, this project is not likely to impact these or other aquatic species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of

habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat present at the project site and within the vicinity of 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 smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant, but also found in marshy meadows and roadside ditches. Due to the location, the type of habitat at the project site and within the vicinity of 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 present at the project site and within the vicinity of 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 northern harrier (*Circus cyaneus*), 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 May 15 to August 1. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the Kirtland's warbler (*Setophaga kirtlandii*), a state endangered bird. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its wintering grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the Lake Erie shoreline. Migrating birds usually forage in forested or shrub/scrub habitat and may stay in one area for several days. Because so much of the southern Lake Erie shoreline is already developed, and stopover habitat is already so fragmented, the DOW recommends that this stopover habitat, (i.e. forested or shrub/scrub area), within three miles of the shoreline be preserved whenever possible. If clearing of suitable habitat cannot be avoided, to preclude adverse effects to Kirtland's warblers, clearing within 3 miles of the Lake Erie shoreline should be avoided from April 22nd through June 1st, and from August 15th through October 15th.

The project is within the range of the piping plover (*Charadrius melodus*), a state endangered and federally endangered bird. This species does not nest in the state but does utilize stopover habitat as it migrates through the region. Due to the location, and the type of work proposed, this project is not likely to impact 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 to 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 U.S. Fish & Wildlife Service.

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

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

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

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

From: Ohio, FW3 <ohio@fws.gov>
Sent: Tuesday, April 14, 2020 2:56 PM
To: Robertson, Brian/CIN
Subject: [EXTERNAL] Proposed Ashtabula-Petmin 138 kV Transmission Line Project

EXHIBIT 16



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# 03E15000-2020-TA-1150

Dear Mr. Robertson,

We have received your recent correspondence regarding potential impacts to federally listed species in the vicinity of the above referenced project. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. We recommend that proposed activities minimize water quality impacts, including fill in streams and wetlands. Best management practices should be utilized to minimize erosion and sedimentation.


FEDERALLY LISTED, PROPOSED, AND CANDIDATE SPECIES COMMENTS: 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 federally listed endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*), we do not anticipate adverse effects to any federally endangered, threatened, proposed or candidate species. Should the project design change, or during the term of this action, 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, consultation with the U.S. Fish and Wildlife Service (Service) should be initiated to assess any potential impacts.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the Endangered Species Act (ESA), between the Service and the federal action agency, is completed. We recommend that 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.

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.), ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the 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 the first name "Patrice" and last name "Ashfield" clearly distinguishable.

Patrice Ashfield
Ohio Field Office Supervisor



Ashtabula-Petmin 138 kV Transmission Line Project Ashtabula County, Ohio

Cultural Resources Literature Review

April 9, 2020

FirstEnergy Service Company



Ashtabula-Petmin 138 kV Transmission Line Project

Project No: D3362000
Document Title: Cultural Resources Literature Review
Date: April 9, 2020
Client Name: FirstEnergy Service Company
Project Manager: Brian Robertson
Author: Jared N. Tuk, M.A. and Amy C. Favret, M.A., RPA

Jacobs Engineering Group Inc.

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United States
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2.2	OHI Architectural and Historical Resources	4
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2.4	Determination of Eligibility Resources	5
2.5	Historic Bridges.....	5
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4.	References Cited	7

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1. Introduction

On behalf of FirstEnergy Service Company (FirstEnergy), Jacobs Engineering Group, Inc. (Jacobs) of Cincinnati, Ohio, conducted a cultural resources literature review for the proposed Ashtabula-Petmin 138 kV Transmission Line Project (Project) in Ashtabula County, Ohio. The Project consists of a new 1.75-mile (2.8-kilometer) long, 138 kV transmission line, between the existing Ashtabula substation and the proposed Petmin substation, along the shore of Lake Erie (Figure 1).

The Project area corresponds to the 1.75-mile (2.8-kilometer) transmission line alignment and is defined as the vertical and horizontal space that will be impacted by Project activities (Figure 2). This also constitutes the direct Area of Potential Effects (APE). Additionally, areas within a maximum 1,000-foot (305-meter) limit from the centerline, refined, as appropriate, based on vegetation, topography, and intervening modern infrastructure, will be considered within the indirect APE. Based on information provided by FirstEnergy, construction activities related to the development of the new transmission line include the installation of steel monopole structures that will be directly embedded in the ground at each location. The permanent ROW for the Project measures 100 feet (30.5 meters) wide.

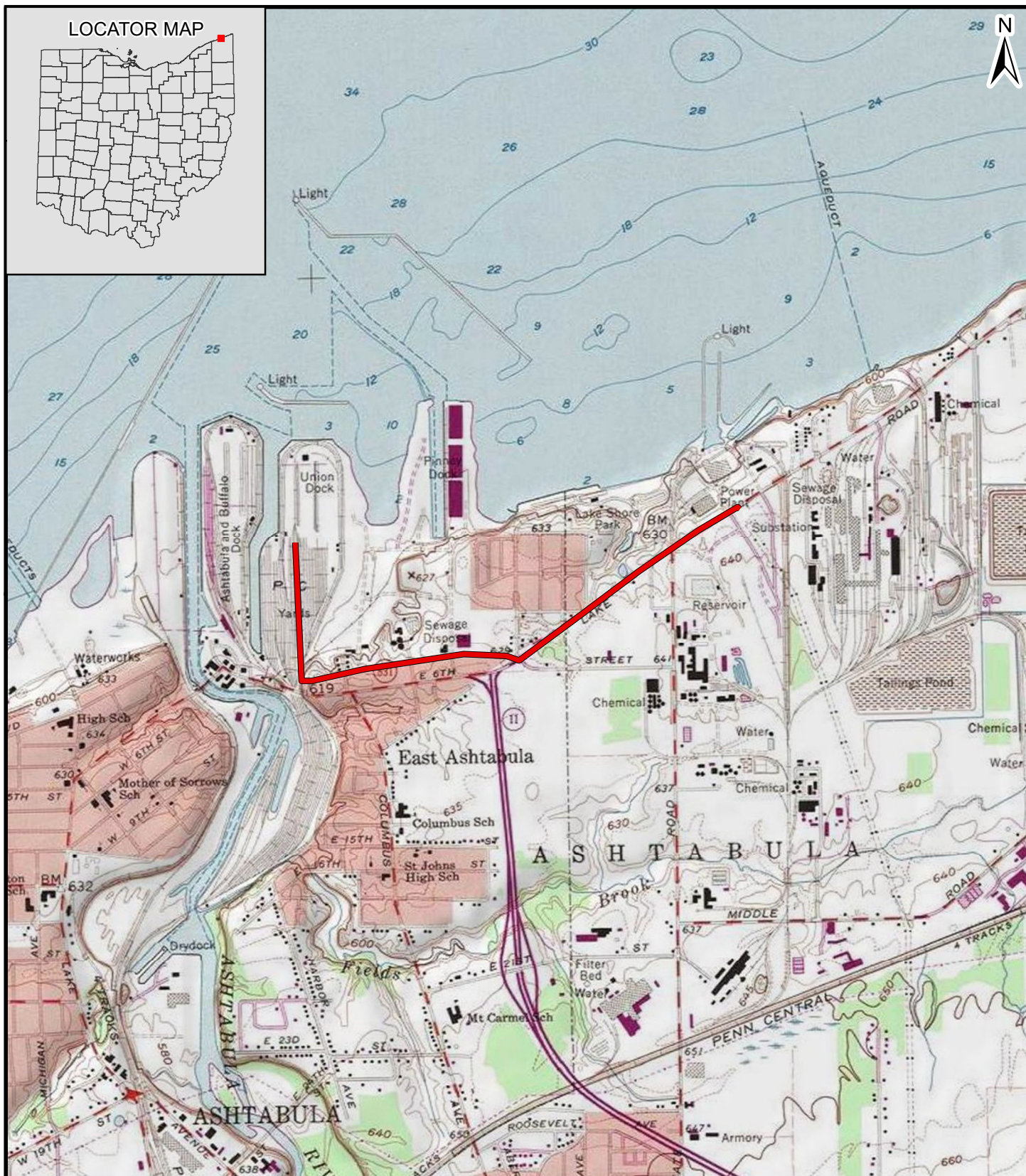
2. Literature Review

Jacobs conducted a literature review for the Project on March 23, 2020 using the Ohio Historic Preservation Office (OHPO) online mapping database, which includes the Ohio Archaeological Inventory (OAI), Ohio Historic Inventory (OHI), National Register of Historic Places (NRHP), NRHP Determination of Eligibility (DOE) files, Ohio Genealogical Society (OGS)-recorded cemeteries, and previously conducted cultural resources surveys. The dual purpose of the review was to locate previously recorded cultural resources within and near the APE, and to provide information on the expected types and locations of resources within the Project vicinity. Research focused on the Project area, as well as a one-mile (1.6-kilometer) radius centered on the Project (Study Area).

Based a review of the records available through the OHPO online mapping database, five OAI-listed archaeological sites, 24 OHI-listed resources, six NRHP-listed resources, four DOE resources, and one historic bridge have been inventoried within the Study Area (Figure 2). No cemeteries or NHLs were identified during the review. Additionally, four previous cultural resources investigations have been documented within the Study Area. Of the cultural resources inventoried within the Study Area, none is within or adjacent to the project area.

2.1 OAI Archaeological Resources

Five previously identified OAI archaeological sites have been documented are within the Study Area (Table 1). These include a prehistoric and historic-period terrestrial site, and three underwater shipwreck sites in Lake Erie. Given their locations far removed from the Project, they do not maintain any potential to be impacted. Site 33AB0070 (the Joseph Street Site), which is located west of the Ashtabula River and far removed from the Project, was identified as a prehistoric burial of unknown temporal affiliation. Site 33AB0112 (Hubbard House), well outside of the Project area, is a historic-period site associated with the NRHP-listed Hubbard House (which is not significant under NRHP Criterion D). Sites 33AB0197, 33AB0198, and 33AB0211 are all underwater shipwreck sites in Lake Erie, located near the East Breakwater, over 0.5 mile (0.8 kilometer) from the Project.



LEGEND:

— Ashtabula-Petmin 138kV
Proposed Route

BASE MAP SOURCE:
USGS 7.5-minute Topographic Quadrangles:
Ashtabula North, Ohio (published 1970) and
North Kingsville, Ohio (published 1980)

0 600 1,200
Scale in Meters

0 2,000 4,000
Scale in Feet

FirstEnergy

Ashtabula-Petmin 138kV
Transmission Line Project

FIGURE 1
PROJECT LOCATION

PN: D3362000

DATE: 4/1/2020

Jacobs

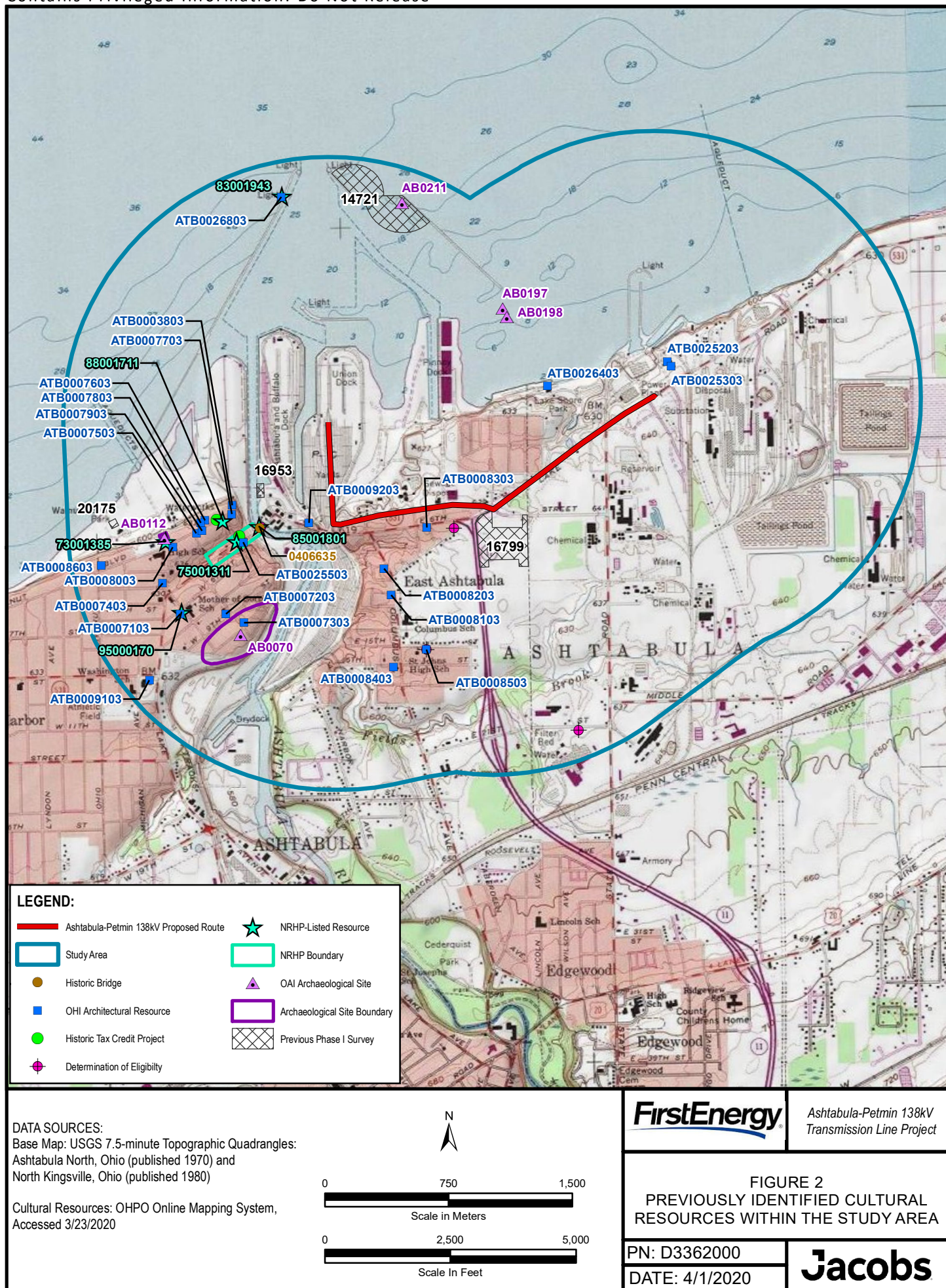


Table 1: Previously Inventoried OAI Resources within the Study Area.

OAI Number	Name	Cultural Affiliation	Site Type
33AB0070	Joseph Street Site	Prehistoric: Unknown Affiliation	Burial
33AB0112	Hubbard House (NRHP)	Historic: Domestic	Domestic
33AB0197	Wonder (shipwreck)	Historic: Shipwreck	Shipwreck
33AB0198	James F. Joy (shipwreck)	Historic: Shipwreck	Shipwreck
33AB0211	Ashtabula East Breakwater Wreck	Historic: Shipwreck	Shipwreck

2.2 OHI Architectural and Historical Resources

There are 24 OHI-listed resources within the study area (Table 2). The plurality of these resources are single residential resources, although resource types vary widely, including churches, a lodge, a school, a social hall, a museum, offices, energy/industrial facilities, recreational resources, and a harbor light. None of the previously inventoried OHI-listed resources is located within or adjacent to the current Project area (see Figure 2).

Table 2: Previously Inventoried OHI Resources within the Study Area.

OHI Number	Resource Name	Location	Resource Type	Date
ATB0007103	Mother of Sorrows Church	1500 W 6th St	Church/Religious Structure	1900
ATB0007203	Grace Christian Assembly	906 Joseph Ave	Church/Religious Structure	1910
ATB0007303	Arvi Paananen House	934 Joseph Ave	Single Dwelling	1900
ATB0007403	Kavela Lodge	NWC Lake & 4th	Lodge	1890
ATB0007503	Robert White House	1236 Walnut Blvd	Single Dwelling	1885
ATB0007603	Leona Robertson House	1205 Walnut Blvd	Single Dwelling	1890
ATB0007703	Paul Goode House	1084 Walnut Blvd	Single Dwelling	1890
ATB0007803	Ende House	1211 Walnut Blvd	Single Dwelling	1920
ATB0007903	Towers House	1218 Walnut Blvd	Single Dwelling	1890
ATB0008003	Ridell House	SEC Lake & Walnut	Single Dwelling	1855
ATB0008103	St Nicholas Hall	1211 Columbus Ave	Social Hall	1919
ATB0008203	Josephine Renzetti Estate	903 Columbus Ave	Retail Store/Shop	1890
ATB0008303	Frank Campisano House	1126 E 6th St	Single Dwelling	1912
ATB0008403	Our Lady of Mt Carmel RC Church	1611 Columbus Ave	Church/Religious Structure	1902
ATB0008503	St Nicholas Byzantine Church	1104 E 15th St	Church/Religious Structure	1906
ATB0008603	AL Prentice House	1845 Walnut Blvd	Single Dwelling	1900
ATB0009103	Washington School	SWC Lake & W 9th	School	1901
ATB0009203	ConRail Freight Office	6th St in Harbor	Rail-Related	1910
ATB0003803	Great Lakes/USCG Mem. Marine Museum	1071 Walnut Blvd	Museum	1871
ATB0025203	Ashtabula Generating Plant AB	2133 Lake Rd	Energy Facility	1930
ATB0025303	Ashtabula C Generating Plant	2715 Lake Rd	Energy Facility	1949

OHI Number	Resource Name	Location	Resource Type	Date
ATB0025503	Goodwill Building	1008-1010 W 5th St	Retail/Office	1900
ATB0026403	Lakeshore Park Pavilion	E 1st and Minola St	Recreational	1919
ATB0026803	Ashtabula Harbor Light	600 ft from N end of W Breakwater	Water-Related	1905

2.3 National Register of Historic Places

Six NRHP-listed historic properties are located within the Study Area (Table 3). These include two residences, a church, a bridge, a navigation light, and a historic district. Each of these historic properties, with the exception of the Ashtabula Harbor Light, is located west of the Ashtabula River, far removed from the Project. Each of the resources is listed for architectural and/or engineering significance, in part or in whole, with the exception of the Colonel William Hubbard House, which is significant for its association with the productive life of a significant person. The nearest NRHP-listed property is the West 5th Street Bridge (NRHP # 85001801), which is approximately 1,350 feet (411.5 meters) west of the Project.

Table 3: NRHP-Listed Historic Properties within the Study Area.

NRHP Number	Resource Name	Location	Resource Type	NRHP Criteria
95000170	Mother of Sorrows Church	1500 W 6th St	Church/Religious	C
85001801	West 5th Street Bridge	SR 531 over Ashtabula River	Transportation	C
73001385	Hubbard, Col. William, House	Corner of Lake Ave & Walnut Blvd	Residence (Vacant/Not in Use)	B
83001943	Ashtabula Harbor Light	Ashtabula Harbor	Defense/Transportation	A and C
88001711	Cahill, Michael, House	1106 Walnut Blvd	Domestic	C
75001311	Ashtabula Harbour Commercial District	Both sides of W 5th St from 1200 block to Ashtabula River	Commerce/Trade	A and C

2.4 Determination of Eligibility Resources

Four resources have been formally determined eligible for NRHP listing as a result of previous survey efforts. These include the St. Nicholas Byzantine Church (OHI #ATB0008503), the West 5th Street Bridge (NRHP #85001801), a residence located at 1181 Harmon Road, and an industrial facility located at 1800 East 21st Street, at the one-mile Study Area extent. The nearest of these resources to the Project is the residence at 1181 Harmon Road, which is approximately 460 feet (140.2 meters) south of the Project, opposite SR 531 (East 6th Street) and behind a stand of mature trees.

2.5 Historic Bridges

The aforementioned West 5th Street Bridge has been recorded in OHPO historic bridge records. Built by the Fort Pitt Bridge Works, this three-span, steel, bascule bridge was built in 1925 and reconstructed in 1986. It was listed on the NRHP in 1985, significant for its engineering design.

2.6 Cultural Resources Investigations

Four previous cultural resources investigations were completed within the Project Study Area. Three of the four previous investigations have occurred north and west of the Project area, along or within Lake Erie and the Ashtabula River; however, one previous investigation was conducted in an area south of Harmon Road and east of SR 11, near the Project's alignment at Harmon Road and East 5th Street (Soldo 2005). In addition, one combined Phase I/II investigation was conducted for the U.S. Army Corps of Engineers (USACE) – Buffalo District of three potential facility sites for a proposed Confined Disposal Facility in Lake Erie (Clifford 1993).

In 1993, a combined Phase I/II investigation was conducted on behalf of the USACE – Buffalo District for a proposed Combined Disposal Facility within Lake Erie (Clifford 1993). The investigation studied three separate project areas, identified as Project Area D, Project Area E, and Project Area P. Of these, Project Areas D and E are located within the current Project Study Area. The underwater archaeological survey of these areas consisted of side scan sonar and marine magnetometer and identified a submerged vessel measuring approximately 25 to 30 meters in length in Project Area E. This target, recorded as archaeological site 33AB0211, was confirmed by a diver, and it was determined that the vessel was 95 percent buried in lake bottom sediments. The report recommended that no further work occur in Project Area E until additional NRHP evaluations of the shipwreck could be conducted.

In 2005, Mannik & Smith Group, Inc. conducted a Phase I archaeological survey at the site of a former U.S. Coast Guard station on the east bank of the Ashtabula River, near its mouth (Cameron and Duddleson 2005). The Phase I survey did not identify any archaeological materials or sites within the 0.88-acre project area, and no further work was recommended.

Also in 2005 American Archaeological Services conducted a Phase I survey of a 45-acre parcel for the proposed Ashtabula Industrial Park, located on the southeast quadrant of the intersection of Harmon Road and SR 11 (Soldo 2005). This survey involved the excavation of 742 shovel tests throughout the parcel, and no cultural material or sites were discovered. No further work was recommended.

Finally, in 2016, Weller & Associates, Inc. conducted a Phase I cultural resources survey of a 1.5-acre area associated with proposed improvements to Walnut Beach Park (Engle and Nelson 2016). The survey did not identify any cultural material or archaeological sites, nor were any above-ground architectural and historical resources present. As a result, no further cultural resources investigations were recommended.

3. Summary and Conclusions

This document has presented the results of the literature review for the Ashtabula-Petmin 138 kV Transmission Line Project. The Project consists of a new 1.75-mile (2.8-kilometer) long, 138 kV transmission line, between the existing Ashtabula substation and the proposed Petmin substation, along the shore of Lake Erie in Ashtabula County, Ohio.

The literature review identified 40 previously surveyed resources, including five OAI-listed archaeological sites, 24 OHI-listed resources, six NRHP-listed resources, four DOE resources, and one historic bridge within the Project's one-mile (1.6-kilometer) radius Study Area. None of the previously recorded resources is within or adjacent to the proposed Project area. In addition, four previous investigations have been conducted within the Study Area, but none has occurred within the Project footprint.

The literature review indicated that a number of historic and prehistoric resources have been identified surrounding the Project area, and that due to the Project's location near large water sources (including Lake Erie and the Ashtabula River), there is a moderate likelihood that cultural resources could be located within the

Project area. Therefore, Jacobs recommends that additional cultural resources investigations be conducted within the Project area.

4. References Cited

Cameron, Erica L. and J. Ryan Duddleson

2005 *Phase I Archaeological Survey for the Former United States Coast Guard Station Ashtabula, Ashtabula County, Ohio*. Prepared by Mannik & Smith Group, Inc. Copy on file at the Ohio Historic Preservation Office.

Clifford, Laura

1993 *Phase I/II Cultural Resources (Underwater Survey) Report for the Proposed Confined Disposal Facility in Lake Erie, (Ashtabula County) Ohio*. Prepared by KEMRON Environmental Services. Copy on file at the Ohio Historic Preservation Office.

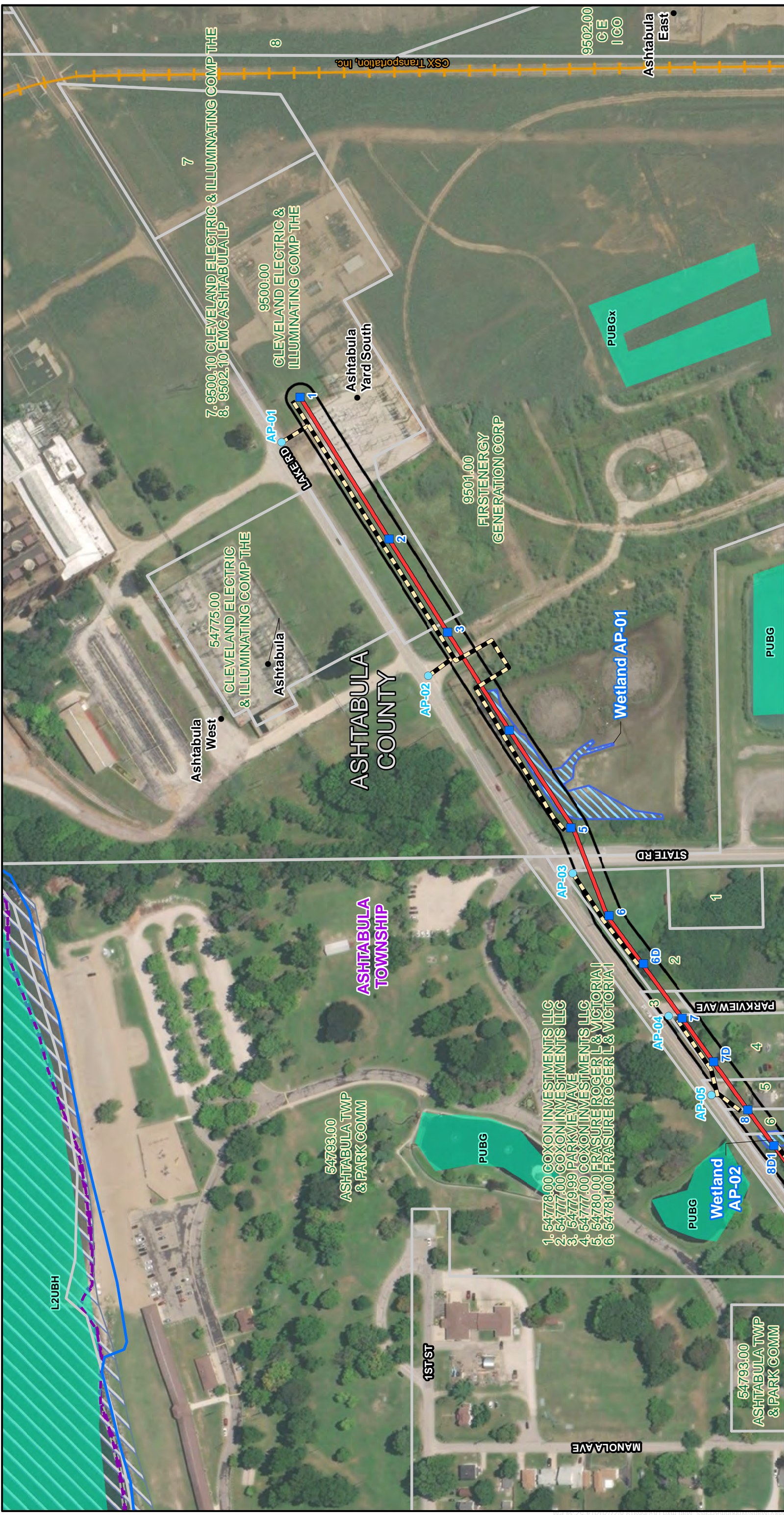
Engle, Josh and Christopher Nelson

2016 *Phase I Cultural Resource Management Investigations for the Proposed 0.6 ha (1.5 ac) Improvements to Walnut Beach Park in the City of Ashtabula, Ashtabula County, Ohio*. Prepared by Weller & Associates, Inc. Report on file at the Ohio Historic Preservation Office.

Soldo, David J.

2005 *A Phase I Archaeological Survey of Approximately 45 Acres for the Proposed Location of the Ashtabula Industrial Park in Ashtabula, Ashtabula Township, Ashtabula County, Ohio*. Prepared by American Archaeological Services. Report on file at the Ohio Historic Preservation Office.

APPENDIX B



LEGEND:

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|---|--------------------------|---|--------------|---|-----------------|
| ● | Substation | ● | Access Point | + | Railroad |
| ■ | Proposed Structure | ▬ | Access Road | ▬ | Impacted Parcel |
| ▬ | Ashtabula - Petmin 138kV | ▬ | NHD Flowline | ▬ | Township |
| ▬ | 60ft ROW Corridor | ■ | NHD Wetland | ▬ | City/Village |
| ▬ | Delineated Wetland | ▬ | Floodplain | ▬ | County |

LOCATOR MAP



BASE MAP SOURCE:
ESRI World Imagery

Ashtabula-Petmin 138kV
Transmission Line Project

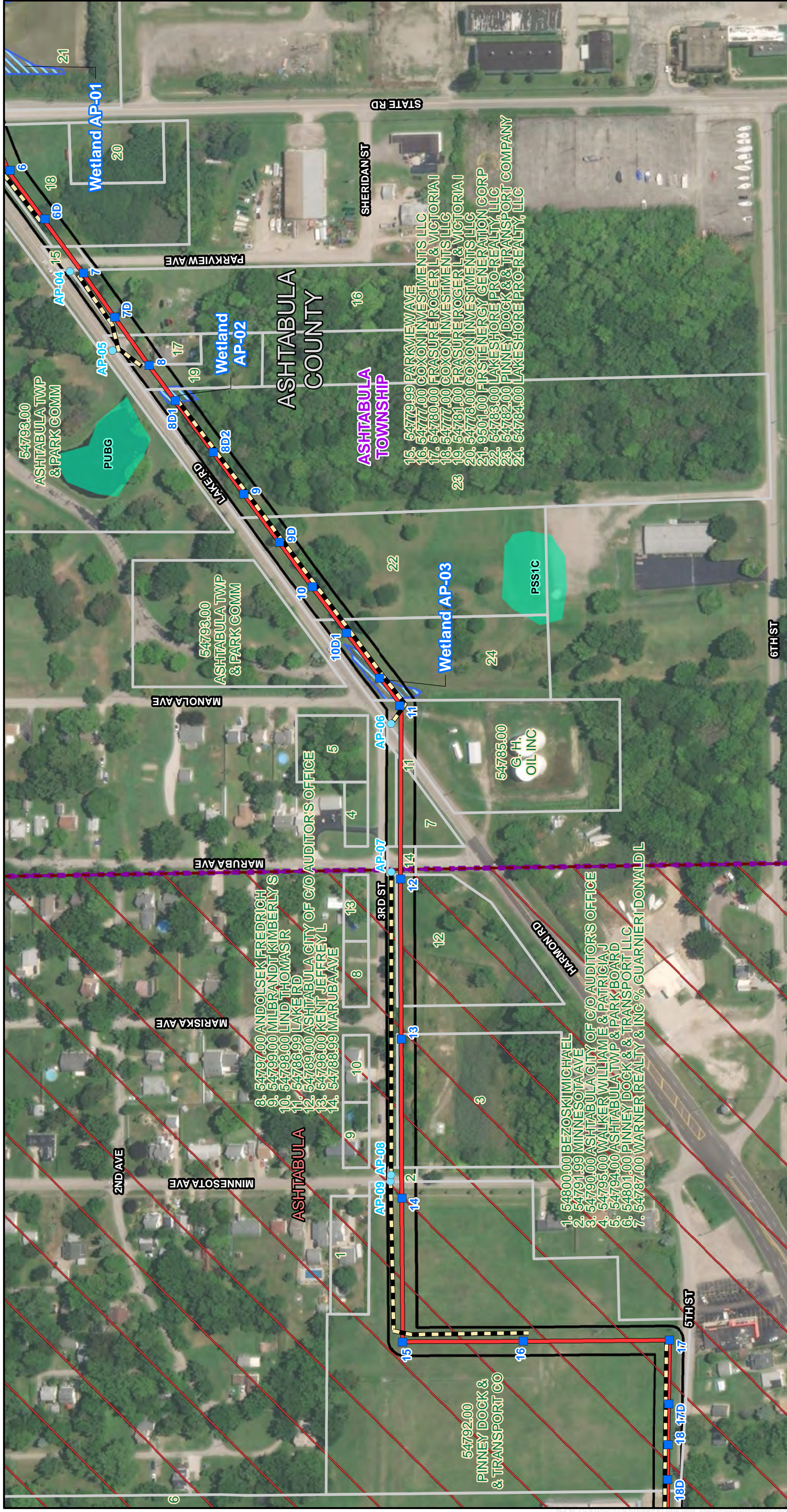
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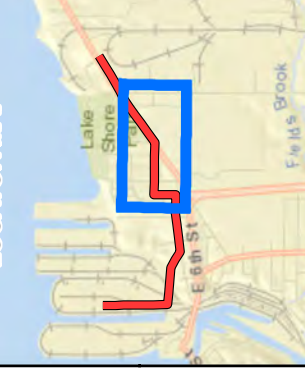
Jacobs



LEGEND:

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|----------------------------|----------------|-------------------|
| ● Substation | ● Access Point | ⚡ Railroad |
| ■ Proposed Structure | ▬ Access Road | ▭ Impacted Parcel |
| ▬ Ashtabula - Petmin 138kV | ▬ NHD Flowline | ▭ Township |
| ▬ 60ft ROW Corridor | ▭ NHD Wetland | ▭ City/Village |
| ▭ Delineated Wetland | ▭ Floodplain | ▭ County |

LOCATOR MAP



BASE MAP SOURCE:
ESRI World Imagery

Ashtabula-Petmin 138kV
Transmission Line Project

Access Map

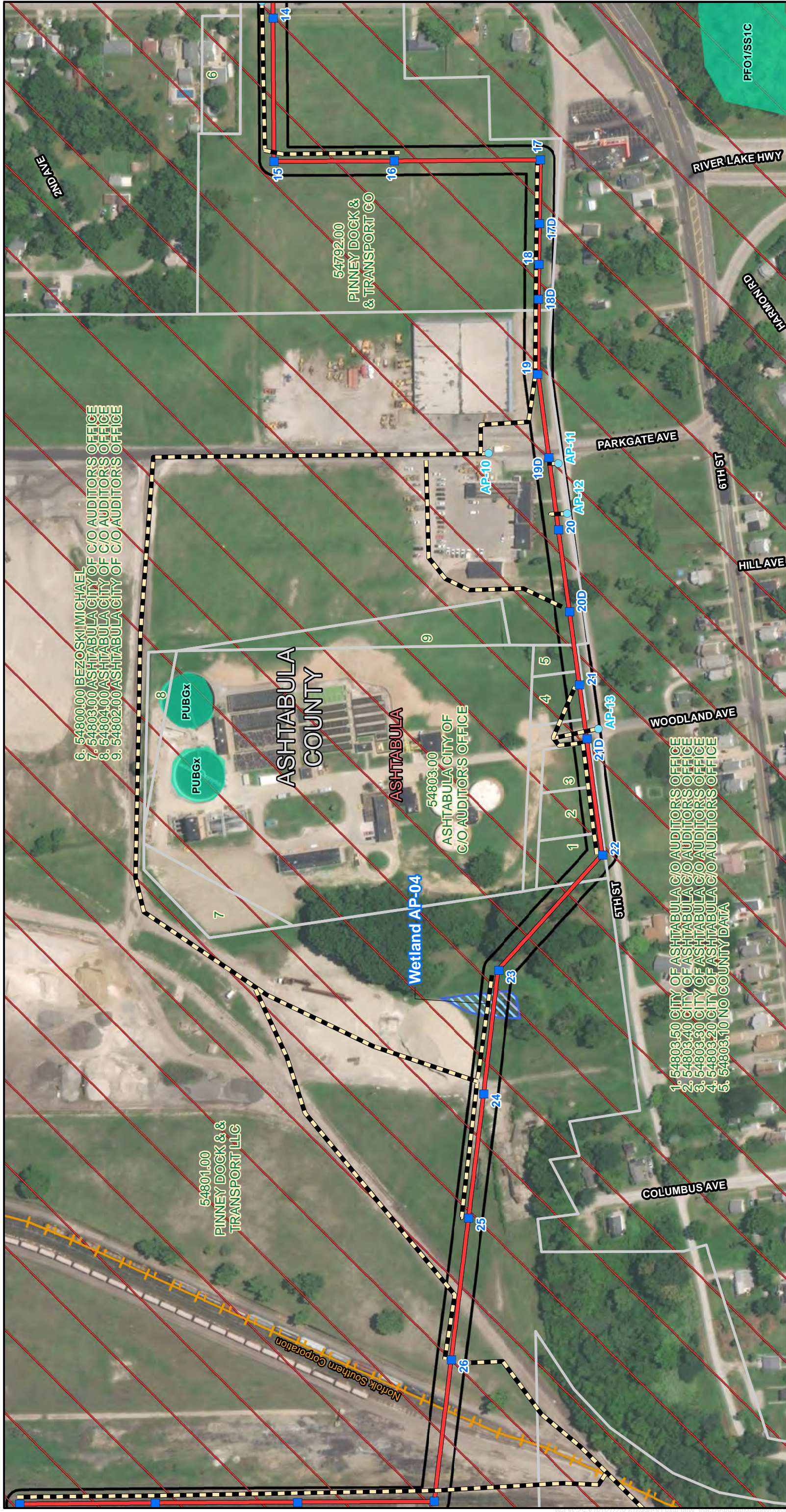
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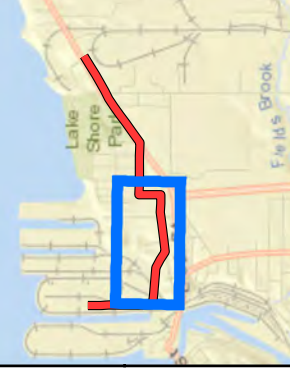
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| ● | Substation | ● | Access Point | + | Railroad |
| ■ | Proposed Structure | ■ | Access Road | □ | Impacted Parcel |
| — | Ashtabula - Petmin 138kV | — | NHD Flowline | ■ | Township |
| ■ | 60ft ROW Corridor | ■ | NHD Wetland | ■ | City/Village |
| ■ | Delineated Wetland | ■ | Floodplain | ■ | County |

LOCATOR MAP



BASE MAP SOURCE:
ESRI World Imagery



FirstEnergy

Ashtabula-Petmin 138kV
Transmission Line Project

Access Map

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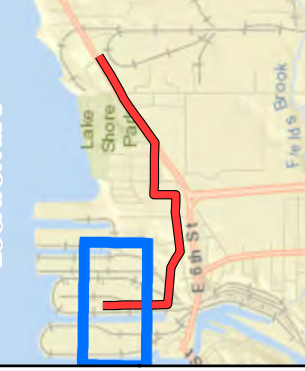
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LEGEND:

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|---|--------------------------|---|--------------|---|-----------------|
| ● | Substation | ● | Access Point | + | Railroad |
| ■ | Proposed Structure | ▬ | Access Road | □ | Impacted Parcel |
| ▬ | Ashtabula - Petmin 138kV | ▬ | NHD Flowline | ■ | Township |
| ▬ | 60ft ROW Corridor | ■ | NHD Wetland | ▬ | City/Village |
| ▬ | Delineated Wetland | ▬ | Floodplain | ▬ | County |

LOCATOR MAP



BASE MAP SOURCE:
ESRI World Imagery



Ashtabula-Petmin 138kV
Transmission Line Project

Access Map

PN: D3362000	Date: 8/28/2020
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Date: 8/28/2020

Jacobs