

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

**CONSTRUCTION NOTICE**

**BABB-EVANS 138 kV TRANSMISSION LINE  
LOOP TO AETNA SUBSTATION PROJECT  
OPSB CASE NO.: 20-1555-EL-BNR**

**October 16, 2020**

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

**CONSTRUCTION NOTICE  
BABB-EVANS 138 kV TRANSMISSION LINE LOOP TO  
AETNA SUBSTATION PROJECT**

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

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

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

Name of Project: Babb-Evans 138 kV Transmission Line Loop to Aetna Substation Project (“Project”).

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, is proposing to loop the Babb-Evans 138 kV Transmission Line into the Aetna Substation and to relocate the last span of the Aetna-West Akron 138 kV Transmission Line to accommodate the proposed transmission line loop. This will support the ongoing Aetna Substation upgrade project wherein ATSI is converting Aetna into a five (future six) breaker ring bus. The proposed Project will enhance system performance and improve reliability by introducing a second 138 kV source for the downtown Akron 22.86 kV network system, the downtown Akron 23 kV system, and the University of Akron. The Project will also allow for increased operational flexibility for FirstEnergy to perform necessary maintenance.

The general location of the Project is shown in Exhibit 1 on a United States Geological Survey (“USGS”) topographic map. Exhibit 2 shows the general Project layout superimposed on aerial imagery provided by ESRI, a geographic information system

company. The general layout of the Project is shown in Exhibit 3. The Project is located in the City of Akron, Summit County, Ohio.

Presently, the existing Aetna Substation has a 138 kV single bus configuration and is serviced by the radial Aetna-West Akron 138 kV Transmission Line. ATSI is converting the substation from a single bus configuration to a five (future six) breaker ring bus. This results in a more reliable configuration, as compared to the single bus configuration, because it allows faulted circuits to be easily isolated without interrupting service as well as because it provides FirstEnergy with greater operational flexibility to perform necessary maintenance.

This Project proposes to bring a second 138 kV source into Aetna Substation to improve reliably and enhance service. The existing single-circuit Babb-Evans 138 kV Transmission Line presently bypasses the Aetna Substation, as shown in Exhibit 3. The Babb-Evans 138 kV Transmission Line is located near the Aetna Substation and shares a common structure (existing lattice structure no. 694) with the Aetna-West Akron 138 kV Transmission Line, which is approximately 300 feet north of the substation. The Project proposes to loop the Babb-Evans 138 kV Transmission Line into the Aetna Substation and relocate the last span of the existing Aetna-West Akron 138 kV Transmission to accommodate the proposed transmission line loop.

As shown in Exhibit 3, the Project proposes to install approximately 393 feet (approximately 0.07 mile) of new 138 kV double circuit transmission line from existing lattice structure 694 to the Aetna Substation. This new double circuit construction will include the existing Aetna-West Akron 138 kV Transmission Line, which is being relocated to accommodate the proposed transmission line loop, and an extension of the Babb-Evans 138 kV Transmission Line into the Aetna Substation. The new double circuit 138 kV transmission line will be supported by two proposed steel poles (Structure Nos. 695 and 696) located outside the existing Aetna Substation on property owned by Ohio Edison. In addition, the Project proposes to install approximately 637 feet (approximately 0.12 mile) of new 138 kV single circuit transmission line from existing

wood pole structure no. 10893 to Aetna Substation. This new single circuit construction will include an extension of the Babb-Evans 138 kV Transmission Line to complete the proposed transmission line loop; two steel poles will support this proposed extension. One of the steel poles will be located approximately 120 feet west of existing wood pole structure no. 10894, on land owned by the Summit County Metro Parks. The other steel pole structure supporting the new single circuit 138 kV extension will be located outside the existing Aetna Substation, on property owned by Ohio Edison.

Conductor associated with the existing Babb-Evans 138 kV Transmission Line configuration located between wood pole structures 10893 and 10894 and lattice structure 694 will be removed. Existing wood pole structures 10893 and 10894 are proposed to be replaced with steel poles. Existing lattice structure 694 will remain.

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

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

*(a) Line(s) not greater than 0.2 miles in length.*

The proposed Project is within the requirements of Item (1)(a) as it involves the proposed construction of approximately 0.19 mile of new transmission line.

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

The proposed Project is needed to network the Aetna-West Akron 138 kV Transmission Line with the Babb-Evans 138 kV Transmission Line, for the purpose of creating a network of the Aetna-West Akron, Aetna-Babb and Aetna-Evans 138 kV Transmission Lines. The Project brings additional 138 kV lines to the Aetna 138 kV Substation, namely the Aetna-Babb and Aetna-Evans 138 kV Transmission Lines, adding operational security by preventing a complete loss of service in the event of an outage on the other 138 kV Line.

Presently, commercial and industrial customers in the City of Akron and the University of Akron are fed radially from the Aetna-West Akron 138 kV Transmission Line. Converting the Aetna 138 kV Substation into a five (future six) breaker ring bus and looping in the Babb-Evans 138 kV Transmission Line allows for the Aetna-West Akron 138 kV Transmission Line to be networked. This proposed updated configuration will result in more reliable service and mitigate the likelihood of service interruption for the University of Akron and City of Akron industrial and commercial customers.

The Aetna 138 kV Substation Upgrade Project has been proposed to improve operational flexibility during maintenance and restoration efforts. In addition, the Project will reduce the amount of local load loss (approximately 28 MW) under P1 contingency loss of the radial Aetna-West Akron 138 kV Transmission Line, and it provides additional load and voltage support for the 23 kV and 22.86 kV systems, which support the downtown City of Akron.

FirstEnergy submitted the Project need and justification in the PJM SRRTEP-West meeting held on August 31, 2018. FirstEnergy then submitted the proposed solution to PJM on September 28, 2018, for the proposed Aetna 138 kV Substation Upgrade Project. PJM issued supplemental number S1709 for the Project. The PJM SRRTEP-West slide is included as Exhibit 7.

#### **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. 2020 Long-Term Forecast Report. 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 Babb-Evans 138 kV Transmission Line Loop to Aetna Substation Project (shown as "Aetna 138 kV Ring Bus Project"). The project area is located approximately 12 inches (11" x 17" printed version) from the left edge of the map and 7 inches (11" x 17" printed version) from the top of the map. The general location and layout of the project area is shown in Exhibits 1 through 3.

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

One alternative to the proposed Project is to build approximately 2 miles of new 138 kV line from the Urban 138 kV Substation into the Aetna 138 kV Substation and then expand the Aetna 138 kV Substation into four breaker ring bus and the Urban 138 kV Substation into five (future six) ring bus. This option was not considered in depth because it would result in more impacts and require the acquisition of new right-of-way across or around downtown Akron, which would be more expensive and would not provide any significant operational advantage over the chosen Project plan. Further, this alternative would require the expansion of Urban Substation, which would result in additional impacts and increased cost compared to the proposed Project.

#### **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](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 January 18, 2021 and completed by December 31, 2021.

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

Exhibit 1 depicts the general location of the Project on a USGS topographic map overlay. Exhibit 2 shows the general Project layout superimposed on aerial imagery provided by ESRI. The Project is located in the City of Akron, Summit County, Ohio.

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

The Project is located completely within existing right-of-way; no new right-of-way is required. Table 1 contains a list of property owners affected by the project.

**Table 1: Property Owner List**

<b>Parcel Number</b>	<b>Property Owner</b>	<b>Property Address</b>	<b>Easement Status</b>
6763587	Akron Acquisitions LLC	20 E North Street, Akron, Ohio 44301	Existing
6761684	Metro Regional Transit Authority	27 Ridge Street, Akron, Ohio 44301	Existing
6824203	City of Akron	N Howard Street, Akron, Ohio 44301	Existing
6842548	City of Akron	N Howard Street, Akron, Ohio 44301	Existing
6840058	Troppe Fred G	N Howard Street, Akron, Ohio 44301	Existing
6753474	United States of America	N Howard Street, Akron, Ohio 44301	Existing

6852919	Metro Parks Serving Summit County Board of Commissioners	North Street, Akron, Ohio 44301	Existing
6735213	City of Akron	60 North Street, Akron, Ohio 44301	Existing
6861240	Ohio Edison Co	Walnut Street, Akron, Ohio 44301	Owned in Fee

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

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

The transmission line construction will have the following characteristics:

Voltage: 138 kV

Conductors: There is existing 605 kcmil 24/7 ACSR conductor on the Babb-Evans 138 kV Transmission Line and the same conductor is proposed to be used for the transmission line loop. There is existing 477 kcmil 26/7 ACSR conductor on the Aetna-West Akron 138 kV Transmission Line and the same conductor is proposed to be used for the transmission line relocation.

Static Wire: OPGW is present on the existing Aetna-West Akron 138 kV Transmission Line and is shared with the Babb-Evans 138 kV Transmission Line on the double circuit transmission line from lattice structure 694 north to Babb Substation. The proposed double circuit construction will utilize OPGW into the Aetna Substation. There is existing 7#8 Alumoweld present on the single circuit Babb-Evans 138 kV Transmission Line from lattice structure 694 east to Evans Substation. The proposed single circuit construction will utilize 7#8 Alumoweld into the Aetna Substation.

Insulators: The existing insulators on lattice structure 694 are porcelain, and the insulators will remain. The existing insulators on wood



structures 10893 and 10894 are polymer. New insulators to be installed on the proposed double and single circuit transmission lines will be porcelain.

ROW Width: 100 feet

Structure Types: Exhibit 4: Single circuit, steel pole deadend structure 0-60 degrees; Two (2) structures needed (structures.10894 & no.10895).  
Exhibit 5: Double circuit, steel pole deadend structure 50-90 degrees; Two (2) structures needed (structures 695 & 696).  
Exhibit 6: Single circuit, wood pole deadend structure 45-60 degrees; One (1) structure needed. (structure 10893)

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

The closest occupied residence or institution is approximately 400 feet from the proposed transmission line centerline; as this distance is greater than 100 feet, no Electric and Magnetic Field (“EMF”) calculations are required by this code provision.

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

The estimated capital cost for the proposed project is approximately \$2,461,438 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 Akron, Summit County, Ohio. The main land use around the Project is parks, industrial, and urban. The Project is located in existing right-of-way and no changes or impacts to the current land use are anticipated.

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

No agricultural land is present within the Project area.

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

As part of the investigation, a search of Ohio Historic Preservation Office (“OHPO”) online database was conducted to identify the existence of any significant archeological or cultural resource sites within 0.5 mile of the Project area. The results of the search are shown in Exhibit 8. The specific location of any archeological resources are redacted from the map. No historic or archaeological resources were identified in the Project area of direct effect.

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 six listed NRHP sites (Table 2), five NRHP districts (Table 3), and five NRHP eligible sites (Table 4) were identified within 0.5 mile of the Project area.

**Table 2. List of National Historic Registered Place (“NRHP”) Sites**

Reference Number	Resource Name	Address	Applicable Criteria	Function
92001627	Cascade Locks Historic District	Roughly bounded by North, Howard, Innerbelt SR 59 & the canal from Locks 10 to 16, including discontinuous parts to the North in Akron, Ohio	Event	Industry/ Processing/ Extraction
94000243	Wesley Temple AME Church	104 N. Prospect Street, Akron, Ohio	Event	Religion
83002060	Akron Public Library	69 E. Market Street, Akron, Ohio	Event	Vacant/ Not in Use
03000719	Main-Market Historic District	15-47 N. Main St., 1-39 S. Main St., 39-168 E. Market St., 18-42 N. High St., 70 Broadway St. in Akron, Ohio	Event	Commerce/ Trade
76001531	Miller, Lewis, House	142 King Drive, Akron, Ohio	Person	Domestic
05001146	Werner, Edward P, House	258 W Market Street, Akron, Ohio	Architecture/ Engineering	Vacant/ Not in Use

**Table 3. List of National Historic Registered Place (“NRHP”) Districts**

<b>Reference Number</b>	<b>District Name</b>	<b>Number of Properties</b>	<b>County</b>
85001123	Valley Railway Historic District	0	Summit
85001123	Valley Railway Historic District	0	Cuyahoga
92001627	Cascade Locks Historic District	9	Summit
01001063	Glendale Cemetery	39	Summit
03000719	Main-Market Historic District	17	Summit

**Table 4. List of Eligible National Historic Registered Place (“NRHP”) Sites**

<b>Reference Number</b>	<b>Resource Name</b>	<b>Address</b>	<b>County</b>
65005030	United Way of Summit County	90 N. Prospect Street, Akron, Ohio	Summit
65004955	Frederick Mustill House	234 Ferndale Street, Akron, Ohio	Summit
65004956	Mustill Store	248 Ferndale Street, Akron, Ohio	Summit
65004973	Ohio Canal Lock 12	On Ohio Canal between W. Market St. & W. North St. in Akron, Ohio	Summit
65004974	Ohio Canal Lock 15	On Ohio Canal, 250 ft. n. of W. North St. in Akron, Ohio	Summit

The OHPO database also includes listing of the Ohio Archaeological Inventory (“OAI”), the Ohio Historic Inventory (“OHI”), previous cultural resource surveys, and the Ohio Genealogical Society (“OGS”) cemetery inventory. Twenty-eight OAI listed archeological resources (Table 5) and one-hundred and twenty historic inventory sites (Table 6) have been previously inventoried within 0.5 mile of the Project area.

**Table 5. List of OAI Listed Archeological Resources**

<b>OAI Number</b>			
SU0549	SU0557	SU0568	SU0279
SU0550	SU0559	SU0569	SU0280
SU0551	SU0560	SU0388	SU0607
SU0552	SU0561	SU0554	SU0565
SU0553	SU0562	SU0258	SU0570
SU0555	SU0566	SU0274	SU0601

SU0556	SU0567	SU0278	SU0564
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**Table 6. List of OHI Listed Structural Resources**

OHI Number				
SUM0017712	SUM0362612	SUM0363812	SUM0235712	SUM0047216
SUM0019412	SUM0362712	SUM0364112	SUM0236012	SUM0047311
SUM0019512	SUM0362812	SUM0364212	SUM0236112	SUM0047511
SUM0020212	SUM0362912	SUM0364412	SUM0236212	SUM0047611
SUM0022212	SUM0363012	SUM0365912	SUM0236312	SUM0171812
SUM0022312	SUM0363112	SUM0366012	SUM0236412	SUM0171912
SUM0022612	SUM0363212	SUM0366112	SUM0236512	SUM0172012
SUM0022712	SUM0363312	SUM0237012	SUM0236612	SUM0172112
SUM0022812	SUM0028211	SUM0237112	SUM0236712	SUM0172612
SUM0022913	SUM0029211	SUM0237412	SUM0236812	SUM0172712
SUM0023013	SUM0029311	SUM0237512	SUM0236912	SUM0172812
SUM0023813	SUM0031411	SUM0237612	SUM0299913	SUM0172912
SUM0024213	SUM0032911	SUM0237712	SUM0300013	SUM0173012
SUM0024313	SUM0033011	SUM0237812	SUM0301913	SUM0173112
SUM0026511	SUM0039611	SUM0340211	SUM0302411	SUM0173212
SUM0337811	SUM0040716	SUM0234812	SUM0306811	SUM0173312
SUM0338711	SUM0043412	SUM0234912	SUM0363912	SUM0173412
SUM0361912	SUM0045412	SUM0235012	SUM0364012	SUM0173512
SUM0362012	SUM0045512	SUM0235112	SUM0327312	SUM0173612
SUM0362112	SUM0045612	SUM0235212	SUM0327412	SUM0173712
SUM0362212	SUM0363412	SUM0235312	SUM0327512	SUM0012912
SUM0362312	SUM0363512	SUM0235412	SUM0171512	SUM0013012
SUM0362412	SUM0363612	SUM0235512	SUM0171612	SUM0013712
SUM0362512	SUM0363712	SUM0235612	SUM0045712	SUM0013812

The OHPO database also indicated several historical and archaeological surveys have taken place within 0.5 mile of the Project area. Four historic resource surveys (Table 7), four Phase I Archaeological Assessments (Table 8), and one Phase II Archaeological Assessment (Table 9) were identified.

**Table 7. List of Historic Resource Surveys**

Year	Name	County	Municipality
1996	An Addendum to the Phase I Literature Review and Reconnaissance Survey for the Proposed Valley View Bicycle and Pedestrian Trail in the City of Akron, Portage Township, Summit County, OH	Summit	Akron/ Portage Township

<b>Year</b>	<b>Name</b>	<b>County</b>	<b>Municipality</b>
1998	Akron. A Survey of Canal-Era Historic Resources Ohio & Erie Canal Corridor in Akron, Ohio	Summit	Akron
1995	Akron. Phase I Literature Review and Reconnaissance Survey for the Proposed Valley View Bicycle and Pedestrian Trail in the City of Akron, Portage Twp. Summit Co, Ohio	Summit	Akron/ Portage Township
1997	Akron Twp. Architectural Survey of the Proposed Howard/Cuyahoga Street Bridge Replacement Akron Township, Summit County, Ohio	Summit	Akron Township

**Table 8. List of Phase I Archaeological Assessments**

<b>Year</b>	<b>Name</b>	<b>County</b>	<b>Municipality</b>
1994	Phase II Cultural Resource Investigations of the Proposed Howard/Cuyahoga Street Bridge Replacement, in Akron, Summit County, Ohio	Summit	Akron
2007	The Cascade Locks/Schumacher Mill Canal Project - Science & Service in an Urban Community at Cascade Locks Park, Akron, Summit County, Ohio	Summit	Akron
2002	Archaeological Test Excavations at the Mustill House and Store, Site 33 SU 274, at Lock 15 of the Ohio and Erie Canal, (City of Akron) Summit County, Ohio, 1998 and 1999	Summit	Akron
2013	Phase I Archaeological Survey (with Addenda 1 & 2) for Parts 1-5 of the Ohio Canal Interceptor Tunnel in the City of Akron, Summit County, Ohio	Summit	Akron

**Table 9. List of Phase II Archaeological Assessments**

<b>Year</b>	<b>Name</b>	<b>County</b>	<b>Municipality</b>
2008	Report of the Archaeological Testing of the Geophysical Survey Results at the Schumacher Cascade Mill Site (33 SU 388) in the City of Akron, Summit County, Ohio	Summit	Akron

Based upon the results of the OHPO online database, along with a letter from the Ohio History Connection Office, no impacts to any cultural or historic resources are expected.

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

This Project's scope falls under the minimum land impact requirements to meet either a Pre-Construction Notice (PCN) or a Stormwater Pollution Prevention Plan (SWPPP). No additional permits are required for this Project.

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

As part of the investigation, ATSI retained GPD Group to conduct the necessary environmental surveys, as well as prepare and obtain the required environmental permits. GPD submitted a request to the Ohio Department of Natural Resources ("ODNR") Office of Real Estate to conduct an Environmental Review on August 15, 2020. 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, threatened, or rare species within one (1) mile of the Project area. The ODNR's Office of Real Estate's response on August 15, 2020 indicated that the project is within the range of two (2) state and federally listed species and sixteen (16) state listed species. A copy of ODNR's Office of Real Estate's response is included as Exhibit 9.

As part of the investigation, GPD also submitted a request to the US Fish and Wildlife Service ("USFWS") for an Ecological Review on July 7, 2020, 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 is included as Exhibit 10. The USFWS's response on August 21, 2020 indicated that there are no designated critical habitat within the vicinity of the Project area. 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 10.

**Table 10. List of Endangered, Threatened, and Rare Species.**

<b>Common Name</b>	<b>Scientific Name</b>	<b>Federal Listed Status</b>	<b>State Listed Status</b>	<b>Affected Habitat</b>
Indiana bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees & Forest
Northern long-eared bat	<i>Myotis septentrionalis</i>	Threatened	Threatened	Trees & Forest
Little brown bat	<i>Myotis lucifugus</i>	N/A	Threatened	Trees & Forest
Tricolored bat	<i>Perimyotis subflavus</i>	N/A	Threatened	Trees & Forest
Smooth greensnake	<i>Opheodrys vernalis</i>	N/A	Endangered	Prairie/Wetlands
Spotted turtle	<i>Clemmys guttata</i>	N/A	Threatened	Streams/Wetlands
Iowa darter	<i>Etheostoma exile</i>	N/A	Endangered	Streams/Rivers
Pugnose minnow	<i>Opsopoeodus emiliae</i>	N/A	Endangered	Streams/Rivers
Western banded killifish	<i>Fundulus diaphanus menona</i>	N/A	Endangered	Streams/Rivers
Lake chubsucker	<i>Erimyzon sucetta</i>	N/A	Threatened	Streams/Rivers
Paddlefish	<i>Polyodon spathula</i>	N/A	Threatened	Streams/Rivers
American bittern	<i>Botaurus lentiginosus</i>	N/A	Endangered	Wetlands
Black tern	<i>Chlidonias niger</i>	N/A	Endangered	Wetlands
King rail	<i>Rallus elegans</i>	N/A	Endangered	Wetlands
Northern harrier	<i>Circus cyaneus</i>	N/A	Endangered	Grasslands/Marshlands
Sandhill crane	<i>Grus canadensis</i>	N/A	Threatened	Wetlands

Least bittern	<i>Ixobrychus exilis</i>	N/A	Threatened	Wetlands
Upland sandpiper	<i>Bartramia longicauda</i>	N/A	Endangered	Grassland

The response from ODNR and USFWS indicated the Project is within the range of the federal and state endangered Indiana bat and the federal and state threatened Northern long-eared bat. The Project is not anticipated to begin until January 2021 and any tree clearing associated with the Project will be conducted before April 1, 2021. Therefore, no impacts to these species are anticipated.

Since no impacts to prairie habitat, grasslands, wetlands or streams will occur as result of the Project, no impacts to the species that would inhabit these areas are anticipated.

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

The ODNR Office of Real Estate researched 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 Office of Real Estate's response on August 15, 2020 indicated that they have records of the Cuyahoga Valley National Park and Towpath Trail within one (1) mile of the Project area. Access through both these features will be required for construction of the Project. Coordination with both the National Park Service and Summit County Metro Parks will occur prior to construction activities. No permanent impacts to either area is anticipated.

GPD conducted a wetland and stream assessment of the Project area. On June 9, 2020, the GPD investigation focused on an approximately 5.6-acre study area around the proposed Project centerline, access roads, and additional workspace areas. The results yielded one intermittent stream and one perennial stream. The perennial stream corresponds to the Ohio-Erie Canal which traverses a portion of the Project area. No



wetlands were identified within the Project area. Both streams will be avoided during construction activities.

This Project will not encroach on regulated floodplains. Exhibit 11 depicts the location of regulated floodplains in relation to the Project area.

A review of the National Conservation Easement Database ([www.conservationeasement.us](http://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 National Electrical Safety Code (“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 Letter of Notification Transmittal and Availability for Public Review**

This Construction Notice is being provided concurrently with its docketing with the Board to the following officials in the City of Akron in Summit County, Ohio.

### **Summit County**

Mr. Jeff Wilhite  
Council President  
Summit County Council  
175 S. Main Street, Floor 7  
Akron, OH 44308

Ms. Veronica Sims  
Council Member District 5  
Summit County Council  
175 S. Main Street, Floor 7  
Akron, OH 44308

Mr. Dennis Tubbs  
Assistant Director  
Summit County Planning  
Commission  
175 South Main Street  
Akron, OH 44308

Mr. Alan Brubaker, P.E., P.S.  
Summit County Engineer's Office  
538 East South Street  
Akron, OH 44311

Mr. Brian Prunty  
District Administrator  
Summit Soil & Water Conservation  
District  
1180 S. Main Street, #241  
Akron, OH 44301

### **City of Akron**

Major Dan Horrigan  
City of Akron  
Suite 200 Municipal Building  
166 S. High Street  
Akron, OH 44308

Mr. Rich Swirsky  
Akron City Council, Ward 1  
183 North Highland Avenue  
Akron, OH 44303

Ms. Tara Samples  
Akron City Council, Ward 5  
243 Elizabeth Parkway  
Akron, OH 44304

Mr. Jason Segedy, Director  
Planning and Urban Development  
166 S. High Street  
Akron, OH 44308

### **Library**

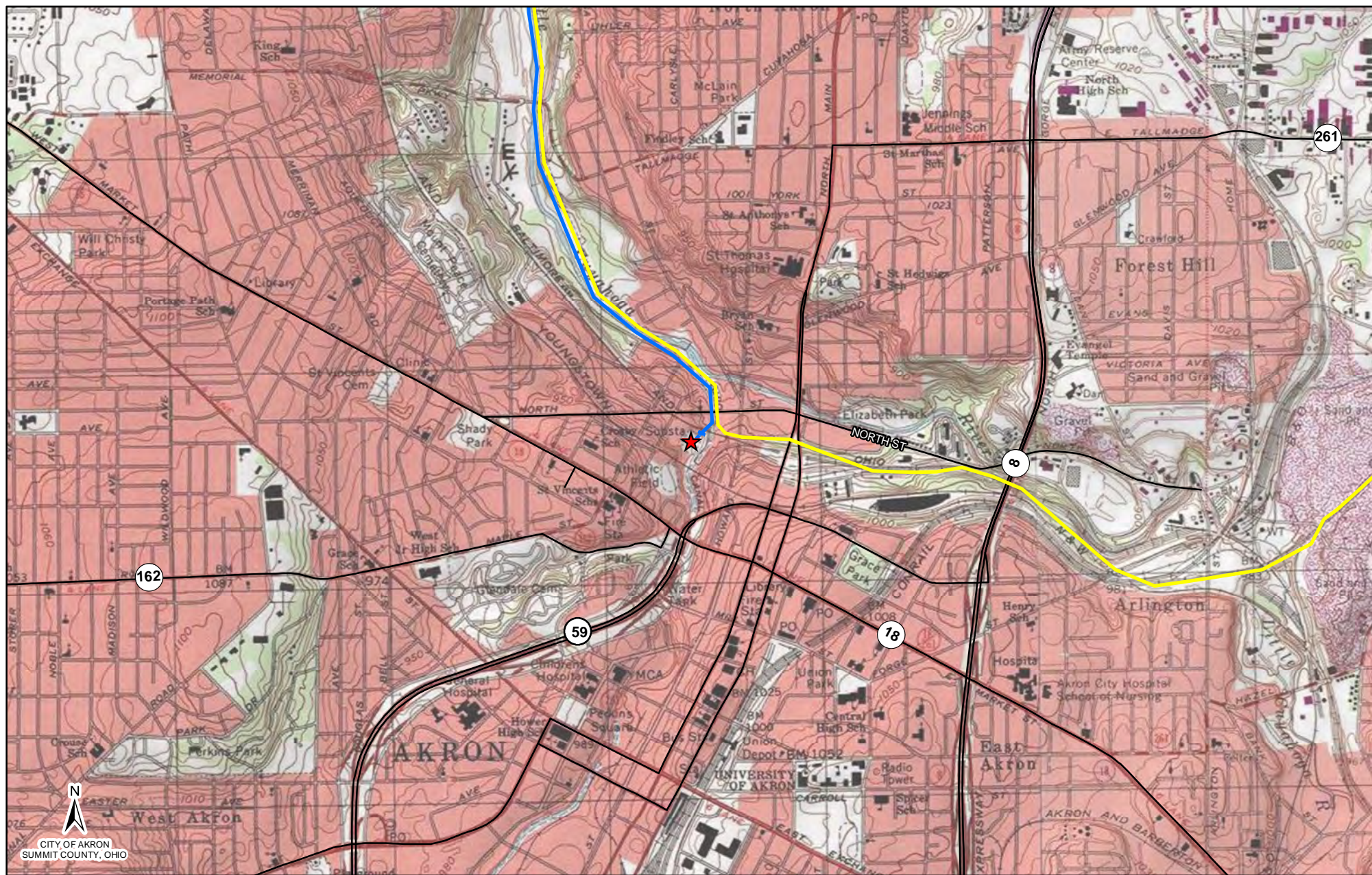
Ms. Pamela Hickson-Stevenson  
Library Director  
Akron-Summit County Public Library  
60 S High Street  
Akron, OH 44326

Copies of the transmittal letters to these officials have been included with this application and are being provided in accordance with OAC Rule 4906-6-07 (B) as proof of

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

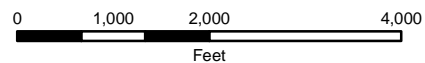
Information is posted at [www.firstenergycorp.com/about/transmission\\_project/ohio.html](http://www.firstenergycorp.com/about/transmission_project/ohio.html) on how to request an electronic or paper copy of this Construction Notice application. The link to this website is being provided to meet the requirements of OAC Rule 4906-6-07 (B) and to provide the Board with proof of compliance with the notice requirements in OAC Rule 4906-6-07 (A)(3).





**LEGEND:**

- ★ Project Location
- Aetna-West Akron 138 kV
- Babb-Evans 138 kV
- Road

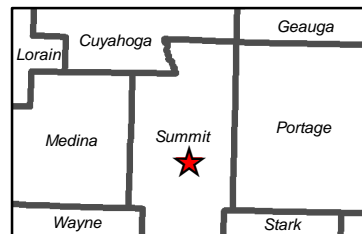


**Reference:**

USGS Topographical Overlay; ODOT

**Coordinate System:**

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

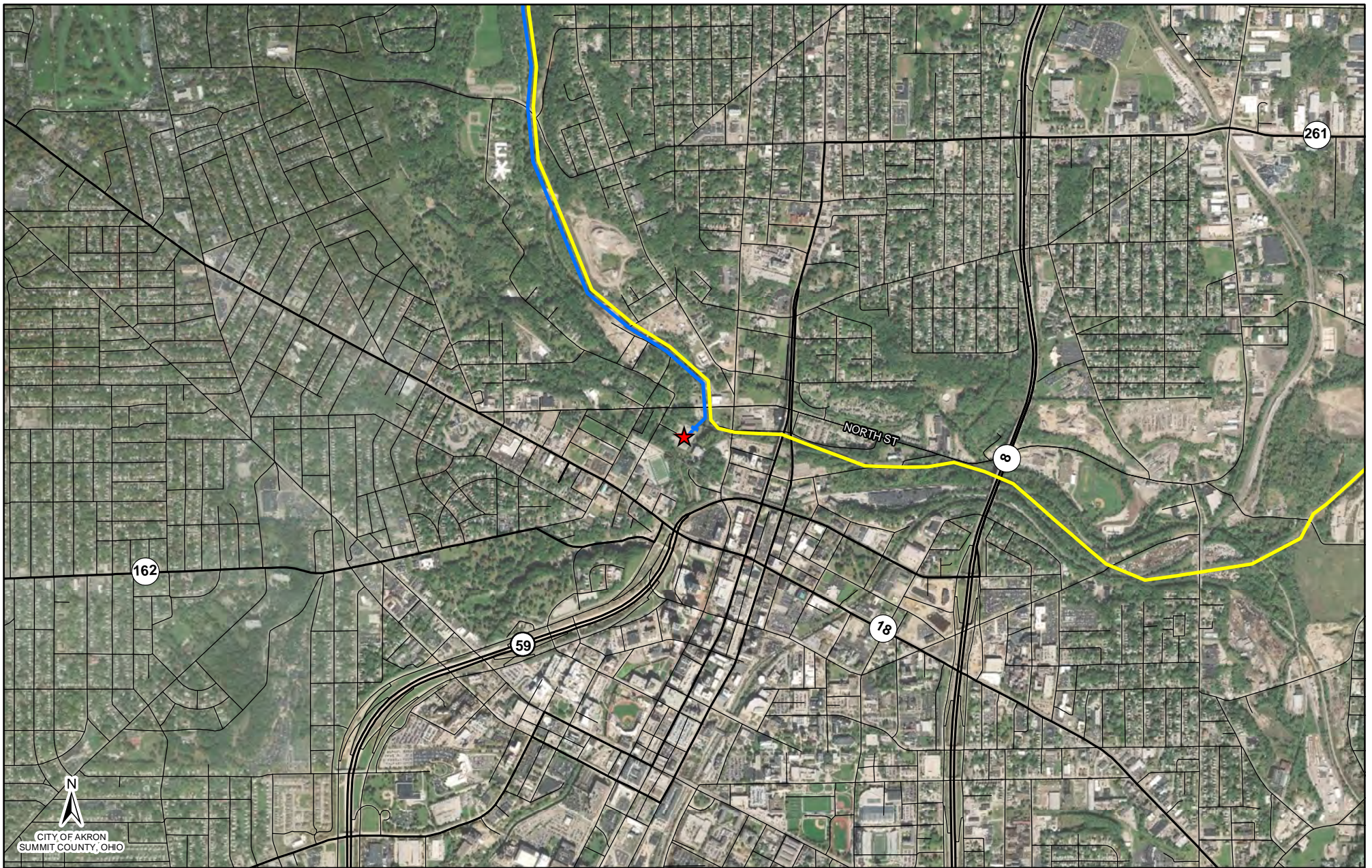


**EXHIBIT 1**

**FirstEnergy**

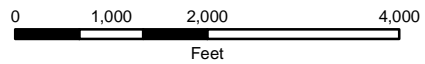
**Aetna 138 kV Substation  
Upgrade Project**





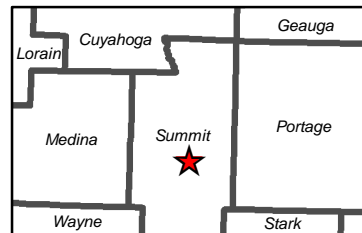
**LEGEND:**

- ★ Project Location
- Aetna-West Akron 138 kV
- Babb-Evans 138 kV
- Road



**Reference:**  
ESRI Aerial Overlay; ODOT

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

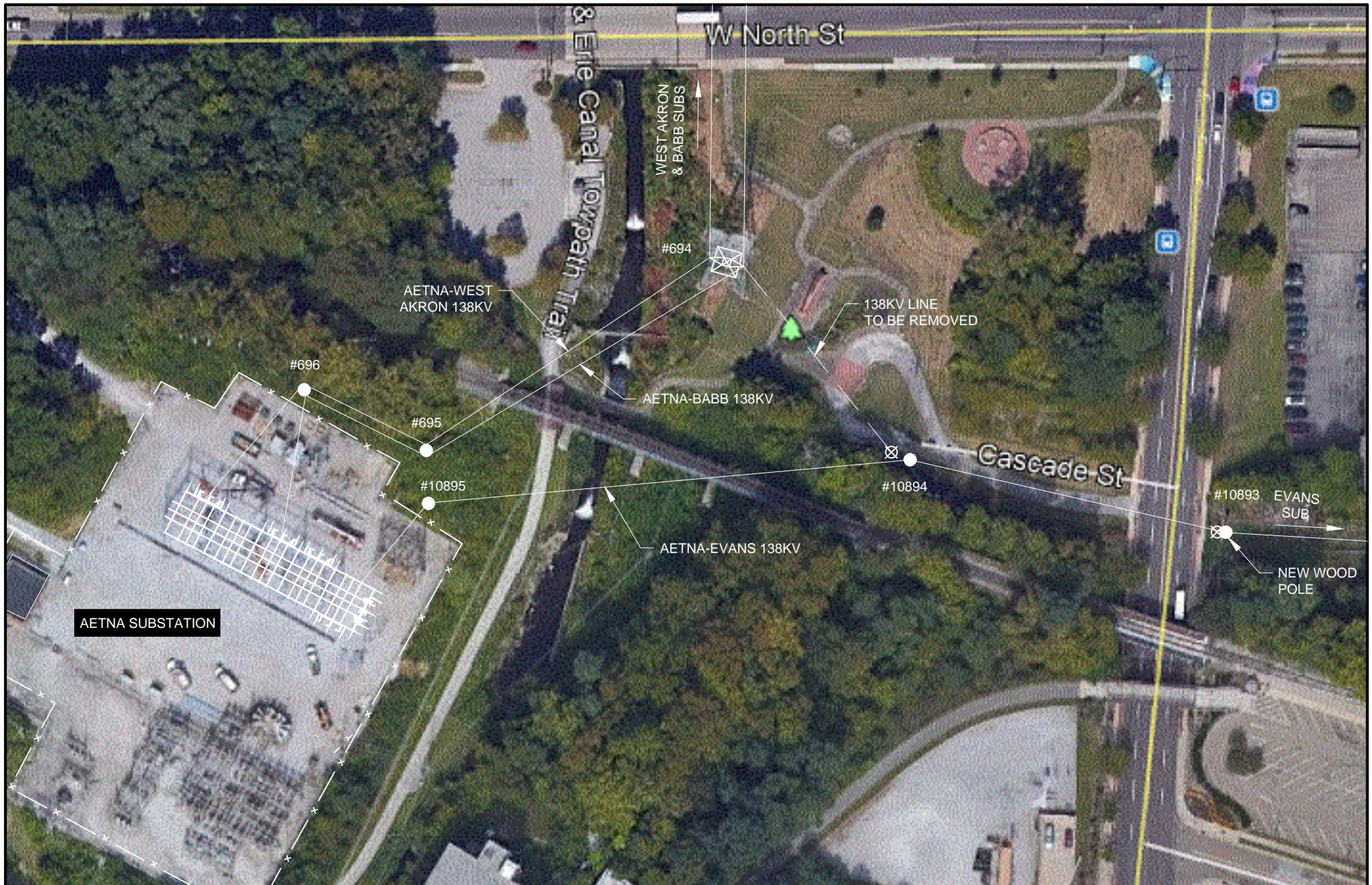


**EXHIBIT 2**






**Aetna 138 kV Substation  
Upgrade Project**





# LEGEND

-  EXISTING POLE TO BE REMOVED
-  NEW POLE (STEEL UNLESS NOTED OTHERWISE)
-  EXISTING LATTICE TOWER

DR. <i>ARL/GPD</i>	08/20	C.E. 18-126-OE
CHK. <i>DLS/GPD</i>	08/20	ORDER NO. 15815068 & 15815069
INS. <i>RDM/GPD</i>	08/20	WBS OE-002843
APP. <i>JWP/GPD</i>	08/20	R/W
		SCALE 1"=100'

## BABB-EVANS 138KV TRANSMISSION LINE LOOP TO AETNA SUBSTATION PROJECT EXHIBIT 3

**FirstEnergy**  
Transmission Design

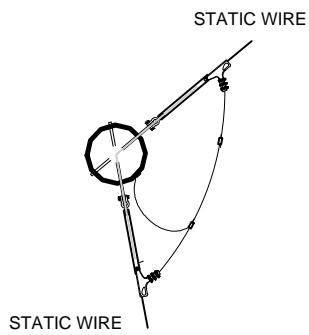
OPERATING CO.  
ATSI/OE

DWG NO.

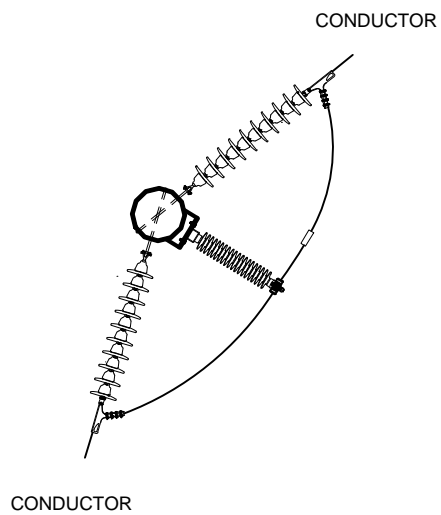
TZ-6861-A

SHEET	REV.
1/1	

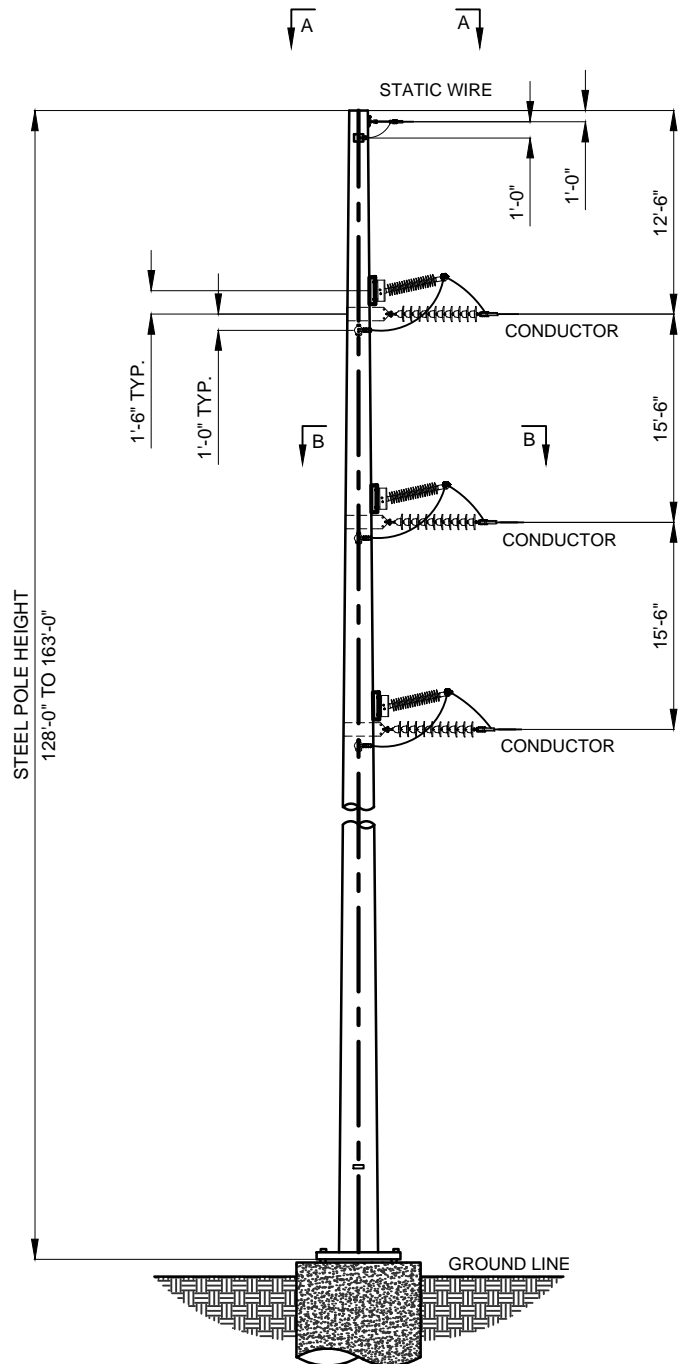




SECTION A-A



SECTION B-B



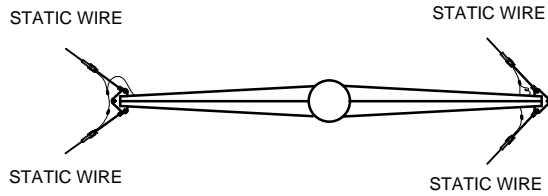
\*\*NOT TO SCALE



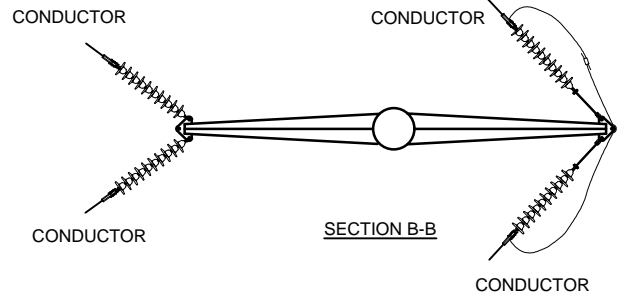
BABB-EVANS 138KV TRANSMISSION LINE  
LOOP TO AETNA SUBSTATION PROJECT

SINGLE CIRCUIT, STEEL POLE  
DEADEND ANGLES 0-60 DEGREES

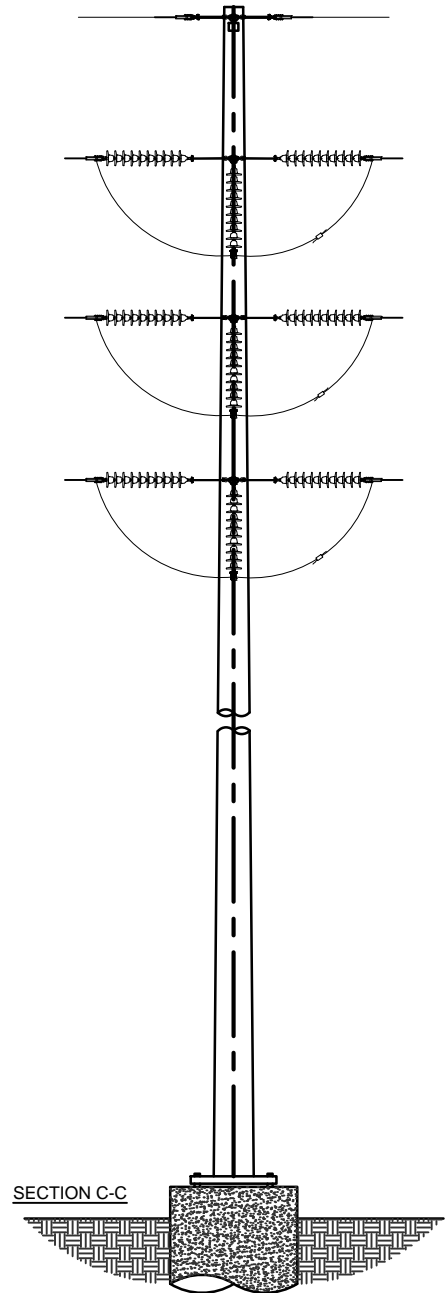
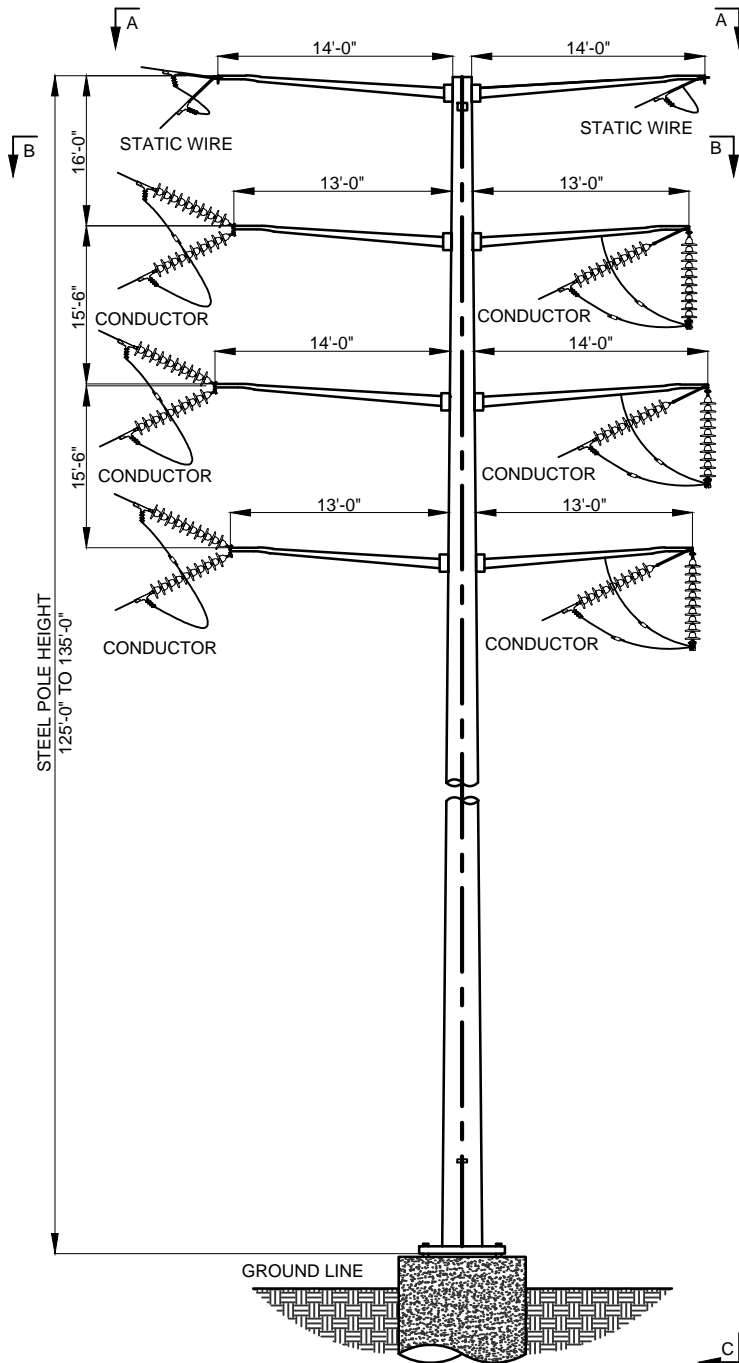
EXHIBIT 4



SECTION A-A



SECTION B-B



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

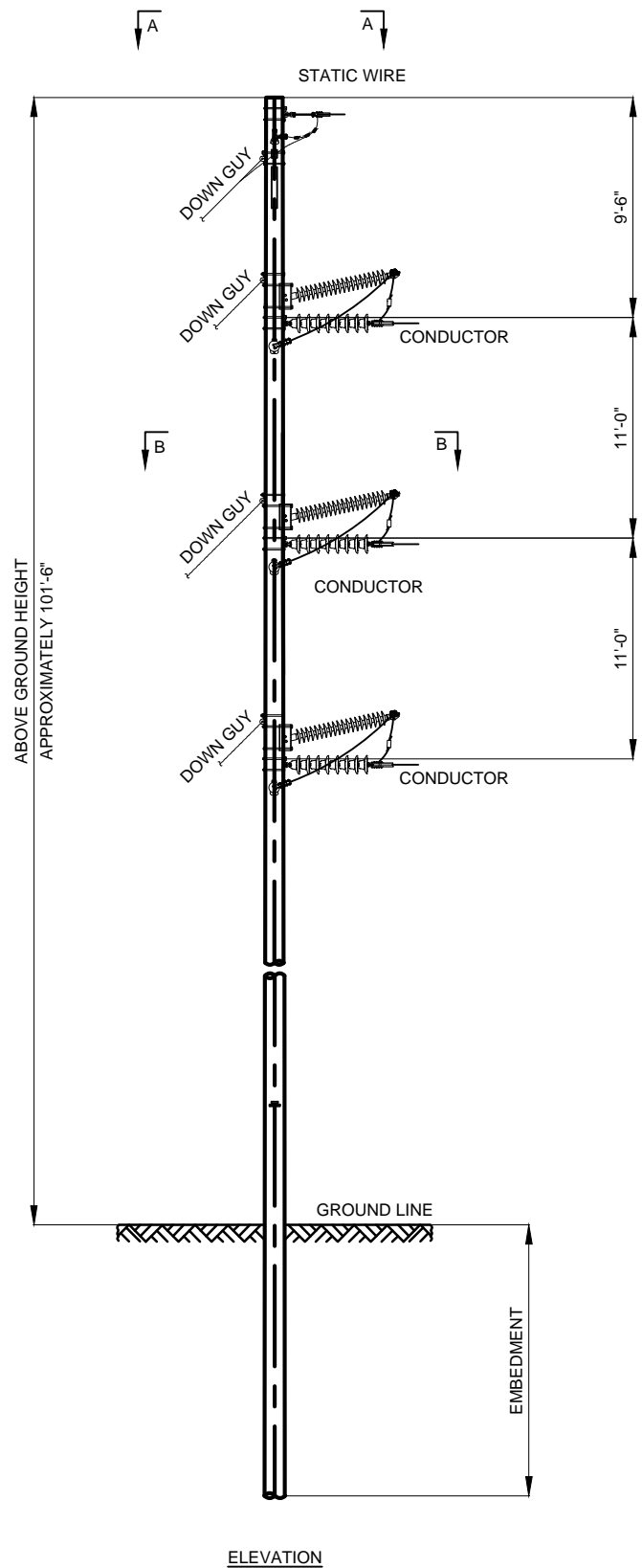
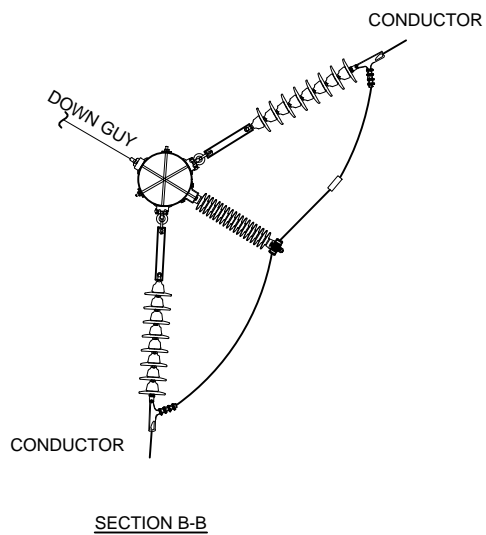
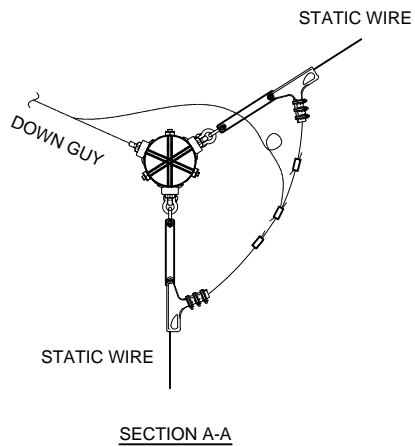
BABB-EVANS 138KV TRANSMISSION LINE  
LOOP TO AETNA SUBSTATION PROJECT

DOUBLE CIRCUIT, STEEL POLE  
DEADEND ANGLES 50-90 DEGREES

\*\*NOT TO SCALE

EXHIBIT 5





\*\*NOT TO SCALE



BABB-EVANS 138KV TRANSMISSION LINE  
LOOP TO AETNA SUBSTATION PROJECT

SINGLE CIRCUIT, WOOD POLE  
DEADEND ANGLES 45-60 DEGREES

EXHIBIT 6

## Exhibit 7



Previously Presented: 8/31/2018 SRRTEP

### Problem Statement (Scope and Need/Drivers):

#### Operational Flexibility and Efficiency

- Improve operational flexibility during maintenance and restoration efforts.
- Reduce the amount of local load loss (Approximately 28 MWs) under P1 contingency loss of the radial West Akron-Aetna 138kV line; provide additional load and voltage support for the Akron downtown 23 kV system.

### Selected Solution:

#### Aetna 138 kV Ring Bus Project (\$1709)

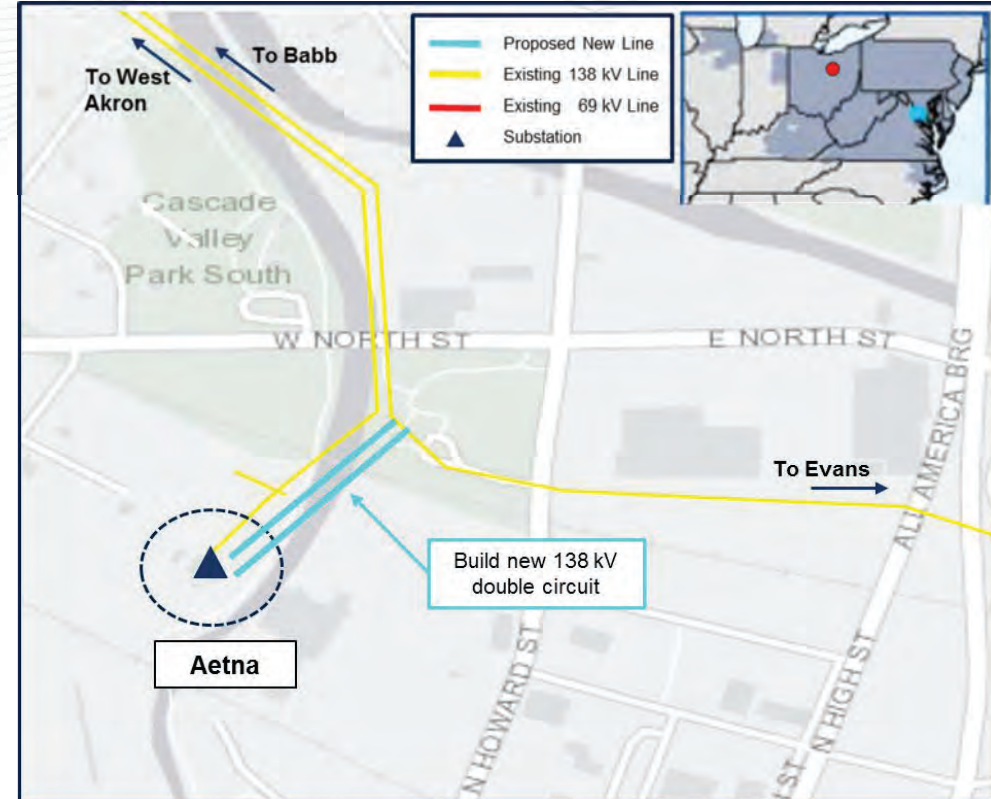
- Network radial 138 kV line feed into planning area.
- Expand the existing 138 kV substation at Aetna to a 5-breaker (future 6 breaker) ring bus; extend the Babb-Evans 138 kV line approximately 0.1 miles as a double circuit in/out of Aetna substation.
- Reconfigure Aetna substation to include terminals for:
  - Aetna-West Akron 138 kV line
  - Aetna-Babb 138 kV line
  - Aetna-Evans 138 kV line
  - One (1) 138-23 kV transformer and one (1) 138/22.86 kV transformer.

**Estimated Project Cost:** \$6.5 M

**Projected IS Date:** 12/31/2021

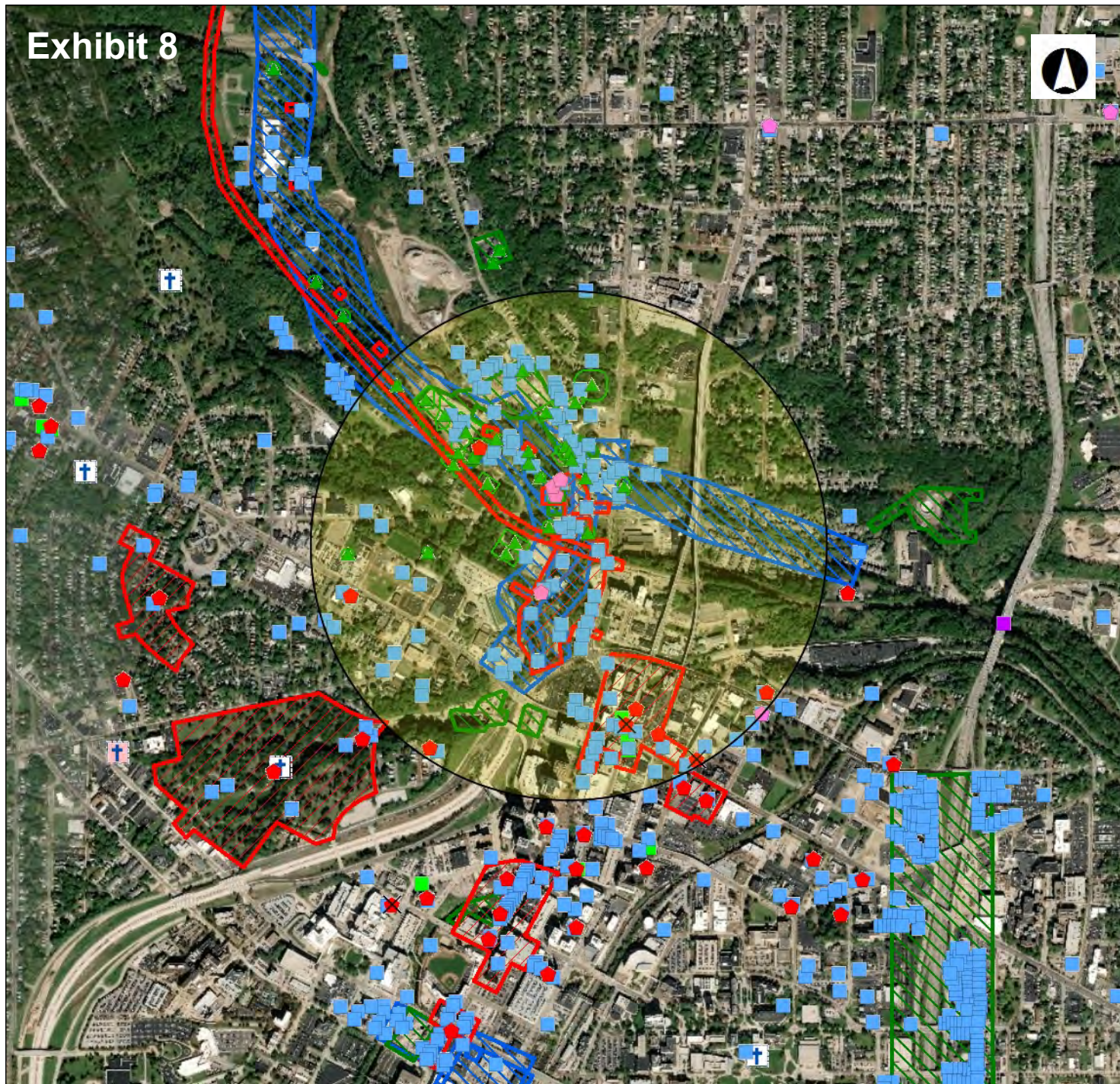
**Status:** Conceptual

## ATSI Transmission Zone: Supplemental Aetna 138 kV Ring Bus Project





# Exhibit 8



State Historic  
Preservation Office

## Legend

### NR Listings

- Listed
- ⊙ National Historic Landmark
- ✕ Delisted

### NR Determinations of Eligibi

- ◆ Archaeological Sites
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects

### OGS Cemeteries

- ⛦ Confident
- ⛦ Not Confident

### Dams

### UTM Zone Split

### NR Boundaries

### OAI Site Boundaries

### Phase1

### Phase2

0 0.30 0.61 Miles

1: 24,000

## Copyright/Disclaimer

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

August 15, 2020

Cassandra Austin  
GPD Group  
1801 Watermark Drive, Suite 210  
Columbus, Ohio 43215

**Re:** 20-618; 5 Bkr 138kV Ring Bus Project

**Project:** The proposed project involves converting the existing Aetna 138 kV Substation to a five (future six) circuit breaker ring bus. ATSI is proposing to loop the Babb-Evans 138 kV Transmission Line into the Aetna Substation, and relocate the last span of the Aetna-West Akron 138 kV line.

**Location:** The proposed project is located in the City of Akron, Summit 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:

Cuyahoga Valley National Park – National Park Service  
Towpath Trail – Portage Parks District

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.

**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 little brown bat (*Myotis lucifugus*), a state endangered species. Presence of listed bats has been established in the area, and therefore additional summer surveys would not constitute presence/absence in the area. 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. However, limited summer tree cutting may be acceptable after further consultation with the DOW (contact Sarah Stankavich, [sarah.stankavich@dnr.state.oh.us](mailto:sarah.stankavich@dnr.state.oh.us)).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees.

The DOW also recommends that a desktop or field-based habitat assessment is conducted to determine if there are potential hibernaculum(a) present within the project area. Habitat assessments should be conducted in accordance with the current USFWS “Range-wide Indiana Bat Survey Guidelines” and submitted to Sarah Stankavich, [sarah.stankavich@dnr.state.oh.us](mailto:sarah.stankavich@dnr.state.oh.us) if potential hibernacula are present within .25 miles of the project area. If a potential 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 DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the Iowa darter (*Etheostoma exile*), a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, the lake chubsucker (*Erimyzon sucetta*), a state threatened fish, and the paddlefish (*Polyodon spathula*) a state threatened fish. The DOW understands that there is no in-water work proposed. Therefore, this project is not likely to impact these or other aquatic species.

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

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

The project is within the range of the 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 to 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 to 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 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 to August 1. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to 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 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 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 to September 1. 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 to July 31. If this type of habitat will not be impacted, the 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](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](mailto: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](#)  
**To:** [Austin, Cassandra](#)  
**Subject:** Fw: Aetna 5 Bkr 138kV Ring Bus  
**Date:** Friday, August 21, 2020 8:47:15 AM  
**Attachments:** [Patrice Sign Small.jpg](#)  
[Outlook-dr0iiwy2.png](#)

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## Exhibit 10

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**From:** Ohio, FW3  
**Sent:** Tuesday, July 7, 2020 11:32 AM  
**To:** [caustin@gpdgroup.com](mailto:caustin@gpdgroup.com) <[caustin@gpdgroup.com](mailto:caustin@gpdgroup.com)>  
**Cc:** [nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us) <[nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us)>; Parsons, Kate <[kate.parsons@dnr.state.oh.us](mailto:kate.parsons@dnr.state.oh.us)>  
**Subject:** Aetna 5 Bkr 138kV Ring Bus



TAILS #03E15000-2020-TA-1781

Dear Ms. Austin,

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: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees =3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and



northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

*Seasonal Tree Clearing for Federally Listed Bat Species:* Should the proposed project site contain trees  $\geq 3$  inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, we recommend removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

**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](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.

Due to the project type, size, and location, 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.

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](mailto: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](mailto:ohio@fws.gov).

Sincerely,



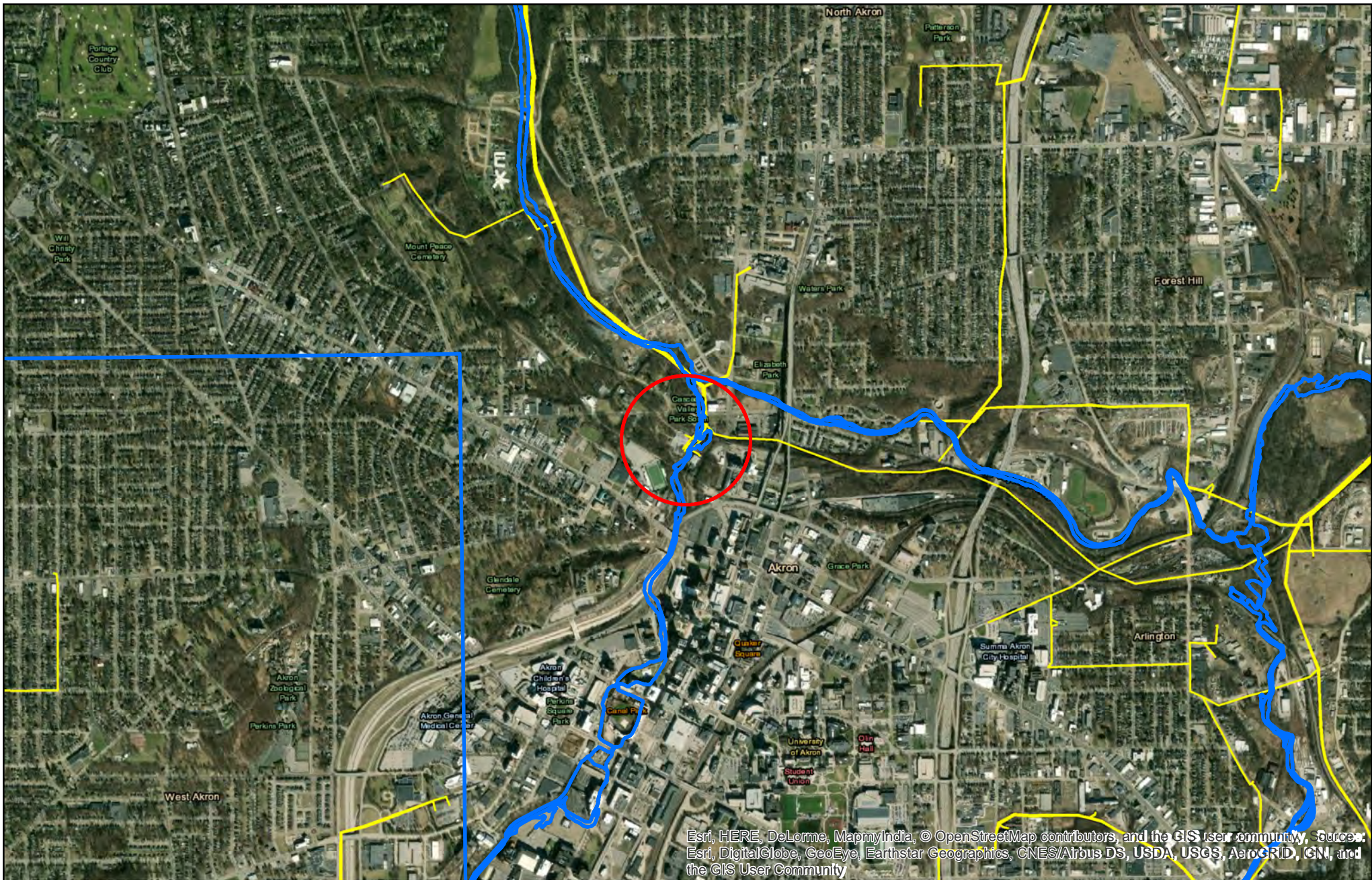
Patrice M. Ashfield

Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW

Kate Parsons, ODNR-DOW





0 0.35 0.7 Miles

1:24,000

- Project Area
- FEMA Flood Zones
- TransmissionLine

## Babb-Evans 138 kV Transmission Line Loop to Aetna Substation Project Exhibit 11

Contains Privileged and Confidential Information and/or Critical Infrastructure Information  
Do Not Release Pursuant to 18 C.F.R. § 388.112



**FirstEnergy**

Created on 10/14/2020