AMERICAN TRANSMISSION SYSTEMS, INCORPORATED
A FIRSTENERGY COMPANY

CONSTRUCTION NOTICE

Bloomingville 345 kV Transmission Line Loop to Bloomingville Substation Project

Case No. 26-0705 -EL-BNR

August 6, 2026

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

CONSTRUCTION NOTICE
BLOOMINGVILLE 345 KV TRANSMISSION LINE LOOP TO BLOOMINGVILLE SUBSTATION PROJECT
CASE NO. 26-0705-EL-BNR

The following information is being provided in accordance with Chapter 4906-6 of the Ohio Administrative Code ("Adm.Code") for the application and review of Accelerated Certificate Applications. Based upon the requirements found in Appendix A to Adm.Code 4906-1-01, this Project qualifies for submittal to the Ohio Power Siting Board ("Board") as a Construction Notice. Pursuant to Adm.Code 4906-6-04, Applicant requests 21-day expedited review of this Application and will comply with the fee and service requirements of that rule.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name and Reference Number

Name of Project:	Bloomingville 345 kV Transmission Line Loop to Bloomingville Substation Project
Reference Number:	1028

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

American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, proposes to loop the Beaver-Davis Besse 345 KV S-26 Transmission Line into the new Bloomingville 345 kV Substation. The Bloomingville 345 kV Substation was approved by the Ohio Power Siting Board in Case No. 19-1073-EL-BTX.

To construct the transmission line loop, two new single steel monopole structures, 41800A and #41800B will be installed along the existing centerline of the Beaver-Davis Besse 345 kV Transmission Line. From the new transmission structures, one span of transmission line will be constructed into the new substation. The construction of the loop will create two new circuits designated as the Beaver-Bloomingville 345 kV Transmission Line and the Bloomingville-Davis Besse 345 kV Transmission Line.

The general location of the Project is shown in **Exhibit 1**, a partial copy of the United

States Geologic Survey, Kimball (OH) Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery of the Project area. The General Layout is attached as **Exhibit 3.** The Project is located in Oxford Township, Erie County, Ohio.

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

The Project meets the requirements for a Construction Notice because the Project is within the types of Projects defined by Items (1)(a), (1)(d)(i) and (2)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm.Code 4906-1-01. Item (2)(a) 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*
>
> *and*
>
> *(2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing transmission line, or replacing structures with a different type of structure, for a distance of:*
>
> *(a) Two miles or less*

The Project is within the requirements of Item (1)(a) as it involves the extension of a single circuit transmission line for a distance of less than 0.2 miles, and the requirements of Item (2)(a) because it involves adding two structures to an existing transmission line for a distance of less than two miles.

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

The proposed Project is needed to provide a 345 kV electrical interconnection for the 297.66 megawatt ("MW") solar photovoltaic ("PV") generation facility proposed by Firelands Wind, LLC (AC2-103) in Huron County, Ohio. ATSI will construct a transmission line-loop of the Beaver-Davis Besse 345 kV Transmission Line into the new

345 kV three-breaker ring bus interconnection station in alignment with FE's "Requirements for Transmission Connected Facilities" document[1] to facilitate the Firelands Wind, LLC (AC2-103) 297.66 MW interconnection. The line loop will be located approximately 31.8 miles from Davis Besse Substation and approximately 28.1 miles from Beaver Substation.

FE and PJM Transmission Planning evaluated the generation interconnection. Results of the FE and PJM analyses are documented on the PJM website[2] for queue Project AC2-103. This proposed Project was not submitted to the PJM Transmission Expansion Advisory Committee ("TEAC") because generation interconnection Projects and the associated network upgrade Projects are not submitted to the TEAC. PJM assigned the network upgrade identification numbers n6699 for the construction of the new 345 kV three-breaker ring bus interconnection station and installation of the revenue metering and n6700 for the 345 kV line loop into the new 345 kV station. ATSI will oversee the construction of the ring bus interconnection station and revenue meter installation as part of network upgrade number n6699 because AC2-103 has elected Option to Build. Additionally, network upgrade numbers n6701, n6702, and n6703 were assigned to replace 345 kV relaying at the Beaver and Davis Besse substations and install 2.0 miles of fiber from the new interconnection station to FE's fiber backbone.

The proposed Project does not impact benchmark reliability metrics. Load growth is not relevant to the proposed Project because load does not impact the need to construct the new 345 kV three-breaker ring bus interconnection station to serve AC2-103. The proposed Project meets the statutory definition of "advanced transmission technology" because it is "hardware technologies that increase the *** reliability or safety of an existing *** transmission system." R.C. 4906.01(M) (as amended by Substitute House Bill 15). By design, a line loop increases redundancy and provides alternate paths in the event of an isolated fault event reducing the overall downtime and also reduces downstream outages during maintenance events.

[1] TPP-REF-004
[2] https://pjm.com/planning/service-requests/services-request-status

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

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2025 Long-Term Forecast Report. This map was submitted to the Public Utility Commission of Ohio ("PUCO") in Case No. 26-0504-EL-FOR under Adm.Code 4901:5-5:04 (C)(2)(b). The map is incorporated by reference only. This Project is included on page 44 of the 2026 Long Term Forecast Report.

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

Due to the nature of the Project and the specific customer need, there are no reasonable or practical alternatives 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 will maintain a copy of this Construction Notice, along with other Project information, on FirstEnergy's website: https://www.firstenergycorp.com/about/transmission_Projects/ohio.html.

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

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

Construction on this Project is expected to begin as early as August 28, 2026, and be completed and placed in service by May 10, 2027. In light of the construction schedule, ATSI requests 21-day expedited review of this application pursuant to Adm.Code 4906-6-04.

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

Exhibit 1 provides a partial copy of the USGS Topographic Map, Kimball (OH) Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery.

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

The proposed Project is located on two parcels. The installation of the two new structures will take place within existing right-of-way ("ROW") partially on a separate parcel owned by Mary M Mathias Trustee, parcel number 25-00140.000, and partially within a parcel wholly owned by Firelands Wind LLC, 23-00030.002. The span of transmission line to the Bloomingville Substation is located on Firelands Wind LLC's parcel number 23-00030.002. The rest of the Project will take place within existing ROW partially on a separate parcel to the north (25-00140.000). No new easements will be required for the Project.

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:	345 kV
ROW Width:	225 ft
Conductors:	954.0 kcmil 48/7-strand ACS
Static Wire:	7#8 Alumoweld
Insulators:	Glass
Structure Type:	**Exhibit 4**: Single Circuit Vertical Deadend Steel Monopole Structure

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

There are no occupied residences or institutions within 100 feet from the existing transmission line centerline, Electric and Magnetic Field ("EMF") calculations are not required by this code provision.

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

The estimated cost for the proposed Project is $518,000. Although not statutorily required for approval, at the request of OPSB Staff, ATSI confirms that ATSI's costs will be

captured and allocated via FERC formula rates for the ATSI Transmission Zone, Attachment H-21 in the PJM OATT.

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

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

The Project is located in Oxford Township, Erie County, Ohio. The land use within the vicinity of the proposed Project is mostly agricultural use with sparse residential use. This Project will take place in existing ROW and on a parcel owned by Firelands Wind LLC.

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

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

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

As part of the investigation for this Construction Notice, a request was submitted to the Ohio Historic Preservation Office (SHPO) for the Emerson Creek Wind Project, which encompasses the area of ATSI's proposed Project, to review and provide comments for the Project Study Area (Area of Potential Effects or APE) with a one (1)-mile search radius. On August 27, 2025, SHPO replied to the request and the response is attached as **Exhibit 5**. SHPO concurred that the Project, as proposed, will not affect any historic properties or cultural resources. No further coordination is required unless the scope of work changes or new/additional archaeological deposits are discovered during construction.

The SHPO database includes a catalog of all historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The file review revealed there are no historic properties within one (1)-mi of the proposed Project.

The SHPO database also includes listings on the Ohio Historic Inventory (OHI), the Ohio Archaeological Inventory (OAI), previous cultural resource surveys, and the Ohio Genealogical Society (OGS) cemetery inventory. The file search revealed that there are no above-ground historic resources, or Ohio Genealogical Society (OGS) cemeteries recorded within one (1)-mi of the Study Area.

The Project area was surveyed as part of the larger archaeological investigation led by The Mannik & Smith Group, Inc., which covered multiple sectors and sites in a report dated July 18, 2025, with the information relevant to this Project included as **Exhibit 6**. The site pertaining to the Bloomingville Project, site 33ER0783 located as an "additional survey area" within Sector 1, produced six-hundred-forty-eight (648) artifacts consistent with "well-plowed over remains of a primary refuse deposit from the Hindley/Hiney farmstead, or—perhaps more likely—the use of household waste as agricultural fertilizer." The report goes on to state that "33ER0783 does not appear to be eligible for the NRHP, and no further investigation is recommended."

The Project Study Area is comprised of an existing, maintained, utility ROW and agricultural land use. The regional landscape is predominantly agricultural with sparse residential areas to the southeast and a wooded area to the east. The proposed Project is not expected to have any adverse effects on known historic properties. No further coordination is required for this Project unless the scope of work changes or archaeological remains are discovered during the Project completion.

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

No additional filings are required at the local, state, or federal level.

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

As part of the investigation, ATSI retained GAI to conduct necessary surveys. GAI submitted a request to the Ohio Department of Natural Resources ("ODNR") Office of

Real Estate to conduct an Environmental Review. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife's Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project Study Area. The ODNR's Office of Real Estate's response on June 15, 2026, indicated that there are nine (9) records of state and/or federally listed plants, animals, and/or communities located within a one-mile radius of the Project Study Area. However, the response noted that the species listed above are not recorded within the specific boundaries of the Project Study Area. Additionally, the Project is within the range of 21 state and/or federally listed animal species. A copy of ODNR's Office of Real Estate's response is included as **Exhibit 7**. A list of all endangered, threatened, and rare species, as identified by ODNR, within a one-mile radius of the Project is provided in **Table 1** and a list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in **Table 2**.

Table 1. List of Endangered, Threatened, and Rare Species within a One-mile Radius of the Project Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Bird				
Upland Sandpiper	*Bartramia longicauda*	N/A	Endangered	Native grasslands, hayfields, pasture, CRP fields
Plants and Plant Community				
Prairie False Indigo	*Baptisia lactea*	N/A	Potentially Threatened	Wet prairies, moist meadows
Broad-winged Sedge	*Carex alata*	N/A	Potentially Threatened	Wet meadows, marshes, sedge wetlands
Carolina Flat-topped Goldenrod	*Euthamia caroliniana*	N/A	Threatened	Wet prairies, fens, marsh margins
Least St. John's-wort	*Hypericum gymnanthum*	N/A	Endangered	Wet sandy soils, marshes, wet depressions
American Water-milfoil	*Myriophyllum sibiricum*	N/A	Endangered	Shallow lakes, ponds, slow-moving waters

Virginia Meadow-beauty	*Rhexia virginica*	N/A	Potentially Threatened	Wet meadows, bogs, marsh edges
Showy Goldenrod	*Solidago speciosa*	N/A	Threatened	Dry prairies, grasslands, savannas
Lance-leaved Violet	*Viola lanceolata*	N/A	Potentially Threatened	Sandy wetlands, bogs, wet meadows

Table 2. List of Endangered and Threatened Species within Range of the Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Bird				
Upland Sandpiper	*Bartramia longicauda*	N/A	Endangered	Native grasslands, pastures, hayfields, CRP fields
Northern Harrier	*Circus hudsonius*	N/A	Endangered	Marshes, grasslands, agricultural fields, open landscapes
Fish				
Brook Trout	*Salvelinus fontinalis*	N/A	Endangered	Cold, clear streams with high dissolved oxygen
Longnose Sucker	*Catostomus catostomus*	N/A	Endangered	Cold rivers and lakes
Lake Sturgeon	*Acipenser fulvescens*	N/A	Endangered	Large rivers, Lake Erie tributaries, nearshore lake habitats
Pugnose Minnow	*Opsopoeodus emiliae*	N/A	Endangered	Vegetated wetlands, backwaters, oxbows
Bigeye Shiner	*Notropis boops*	N/A	Endangered	Small and medium clear streams
Western Banded Killifish	*Fundulus diaphanus menona*	N/A	Endangered	Marshes, shallow lakes, vegetated aquatic habitat
Channel Darter	*Percina copelandi*	N/A	Threatened	Clean streams with sand and gravel substrates
Mammal				
Indiana Bat	*Myotis sodalis*	Endangered	Endangered	Trees, forests, caves, and caverns.

Little Brown Bat	*Myotis lucifugus*	N/A	Endangered	Trees, forests, caves, and caverns.
Northern Long-Eared Bat	*Myotis septentrionalis*	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored Bat	*Perimyotis subflavus*	Proposed Endangered	Endangered	Trees, forests, caves, and caverns.
Reptile & Amphibian				
Eastern Massasauga	*Sistrurus catenatus*	Federally Threatened	Endangered	Wet prairies, fens, marshes, wetlands, adjacent uplands
Smooth Greensnake	*Opheodrys vernalis*	N/A	Endangered	Prairies, meadows, grassy wetlands, roadside habitats
Kirtland's Snake	*Clonophis kirtlandii*	N/A	Threatened	Wet fields, wet meadows, marsh edges, moist grasslands
Lake Erie Water Snake	*Nerodia sipedon insularum*	Federal Species of Concern	Threatened	Lake Erie shorelines, islands, riprap, rocky shores, hibernation sites
Blanding's Turtle	*Emydoidea blandingii*	N/A	Threatened	Marshes, ponds, lakes, streams, swamp forests, wet meadows
Spotted Turtle	*Clemmys guttata*	N/A	Threatened	Fens, bogs, marshes, wet prairies, shallow wetlands
Mussel				
Eastern Pondmussel	*Ligumia nasuta*	N/A	Threatened	Lakes, ponds, wetlands, slow-moving rivers

based on the information received from correspondence with ODNR, the Project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, and

cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost trees.

The Project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project is not likely to impact this species.

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

The Project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project is not likely to impact this species.

The Project is within the range of the Lake Erie water snake (*Nerodia sipedon insularum*), a state threatened species and federal species of concern. Hibernation habitat for this species includes suitable tree roots or hollow tree bases and human-made structures such as walls. If Project construction is within 226 feet of the shoreline, excavation activity should not occur during the hibernation season of October 15 to April 15 or when the air temperature is below 60˚ Fahrenheit. As this Project is not within 226 feet of a shoreline, this Project will not impact this species.

The Project is within the range of the Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as

it moves from one wetland to the next. Due to the location, the type of habitat within the Project area, and the type of work proposed, this Project 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 northern harrier (*Circus hudsonius*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. Because 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 upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. Because this type of habitat will not be impacted, the Project is not likely to impact this species.

The Project is within the range of the eastern pondmussel *(Ligumia nasuta*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this Project will not impact this species.

In addition, GAI submitted a Technical Assistance request to USFWS on February 9, 2026, to research the presence of any endangered, threatened, rare, or designated species within the Project Study Area. A copy of the USFWS' response, dated April 15, 2026, is included in **Exhibit 8**. USFWS' response indicated that due to the Project, type, size, and location, no adverse effects are anticipated to federally endangered, threatened, or proposed species or proposed or designated critical habitat. GAI determined that tree clearing is not anticipated within the Project Study Area; therefore, no impacts to bat species are anticipated as a result of the construction of this Project.

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

GAI performed field investigations to identify and delineate wetlands and waterbodies for the Project Area on July 23, 2025, as shown in the field memo report in **Exhibit 9**. No wetlands or streams were identified and delineated within the Project Study Area.

The Project Study Area encompasses approximately 4.5 acres, located in Oxford Township, Erie County, Ohio. The Project Study Area consists of an existing, maintained utility ROW within agricultural land use. GAI did not observe the presence of any of the ODNR or federally listed species during the field investigations due to the highly maintained nature of the utility ROW and agricultural land use; therefore, no impacts are anticipated to any of the listed species detailed in the ODNR correspondence.

The Limits of Disturbance (LOD) will be completely within the Project Study Area and will predominantly include use of the existing utility ROW for access for the proposed construction. Wetland permits are not required because no wetlands were identified in the Project study area.

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

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

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

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

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

This Construction Notice application is being provided concurrently with its docketing with the Board to the following officials in Oxford Township and Erie County, Ohio. A copy will also be provided to the Milan Public Library for public review/reference.

Erie County

Patrick J. Shenigo
Erie County Commissioners
2900 Columbus Avenue
Sandusky, OH 44870
PShenigo@eriecounty.oh.gov

Mathew R. Old
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Stephen L. Shoffner
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Eric Dodrill, P.E., P.S.
Erie County Engineer's Office
2700 Columbus Avenue
Sandusky, OH 44870
ECEO@eriecounty.oh.gov

Mr. David Foster, President
Erie County Planning Commission
3rd Floor, County Services Center
2900 Columbus Avenue
Sandusky, OH 44870
Planning@eriecounty.oh.gov

Mr. Jim Neill, District Admin.
Erie County Soil & Water District
2900 Columbus Avenue, Room 131
Sandusky, OH 44870
erieconserves@eriecounty.oh.gov

Oxford Township

Scott Leber
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Melissa Pelletier

Oxford Township Fiscal Officer
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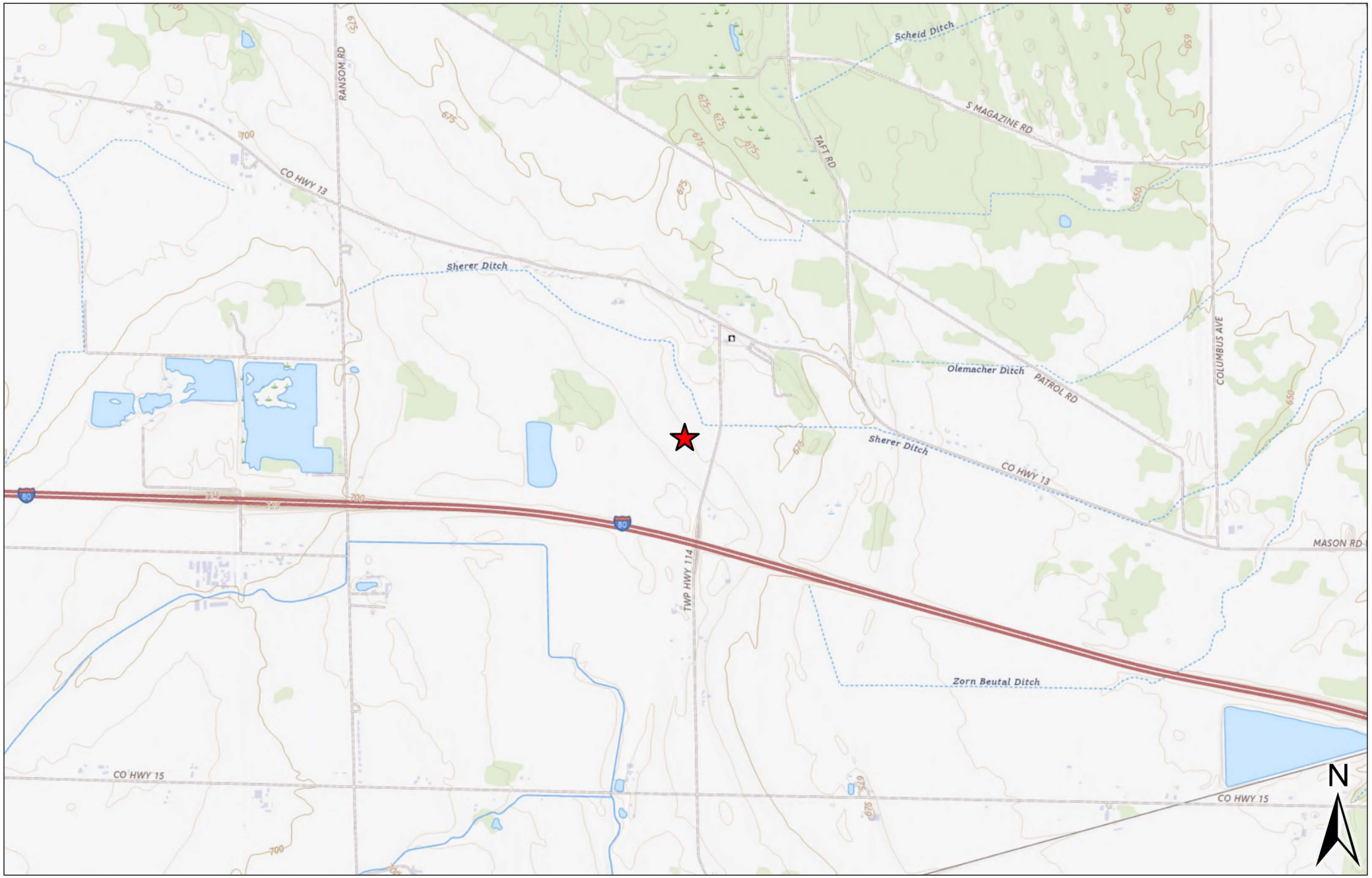
erieoxfordfo@gmail.com

Library

James Tolbert, Director
Milan Public Library
19 Church Street
Milan, OH 44846
james.tolbert@milan-berlin.lib.oh.us

Copies of the transmittal letters to these officials have been included with this application as proof of compliance under Adm.Code 4906-6-07 (B) to provide the Board with proof of notice to local officials as required by Adm.Code 4906-6-07 (A)(1) and to the library per Adm.Code 4906-6-07 (A)(2).

Information is posted at www.firstenergycorp.com/about/transmission_Projects/ohio.html on how to request an electronic or paper copy of this Construction Notice application. The link to this website is being provided to meet the requirements of Adm.Code 4906-6-07 (B) and to provide the Board with proof of compliance with the notice requirements in Adm.Code 4906-6-07 (A)(3).



Legend:

Project Location

0 1,000 2,000 4,000

Feet

Reference Scale: 1:24,000

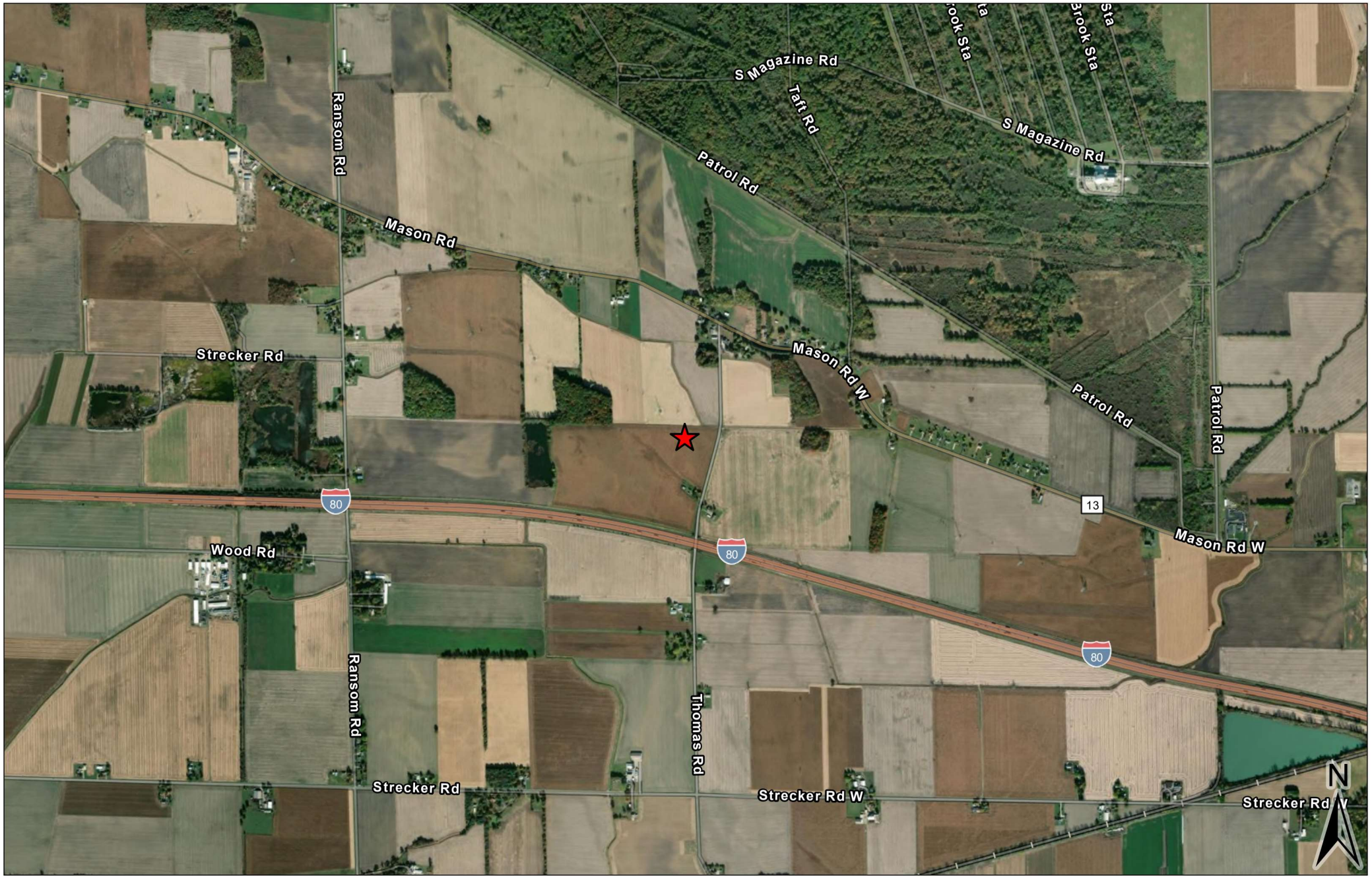
References:
ESRI Aerial Imagery, USGS National Map, ODOT

Coordinate System:
NAD 1983 StatePlane Ohio North FIPS 3401 Feet

Exhibit 1

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

Bloomingville 345 kV Transmission Line Loop to Bloomingville Substation Project



Legend:

Project Location

0 1,000 2,000 4,000

Feet

Reference Scale: 1:24,000

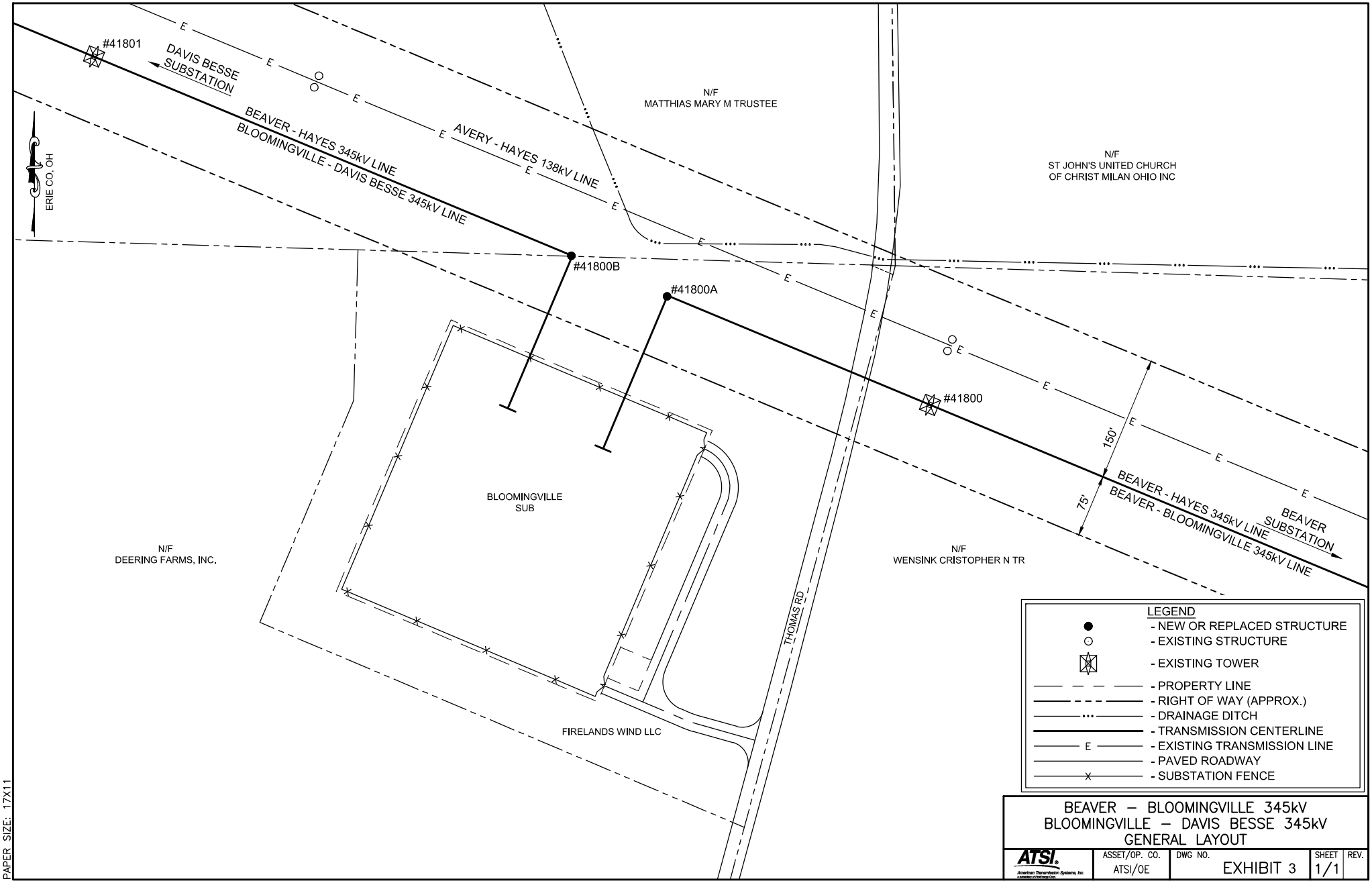
References:
ESRI Aerial Imagery, USGS National Map, ODOT

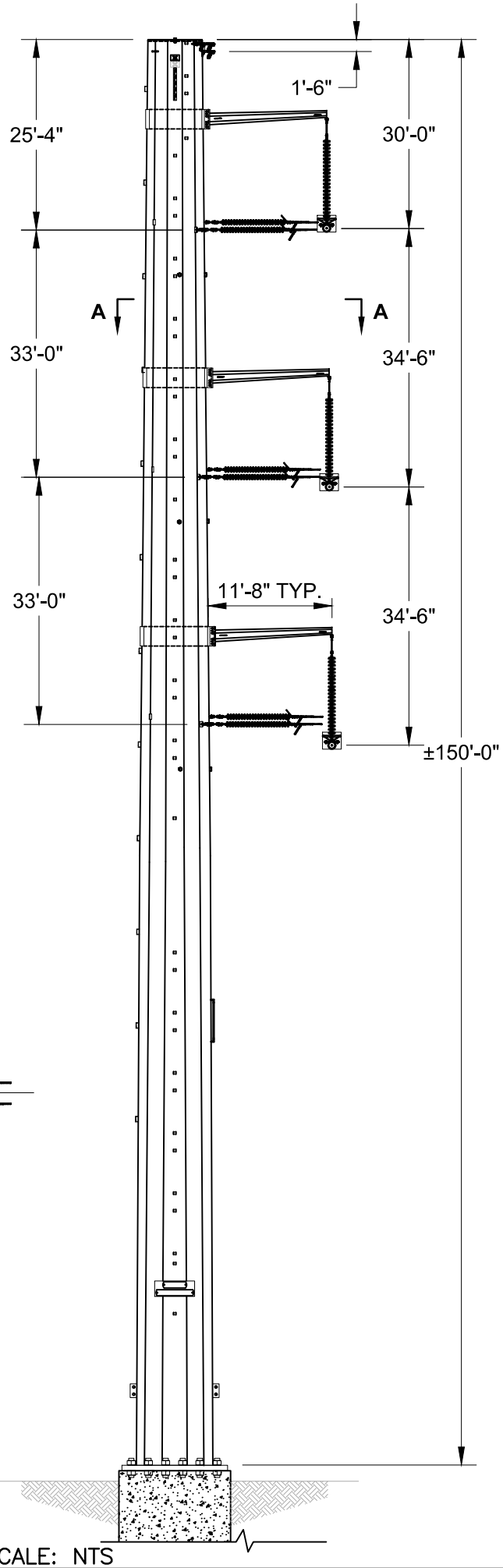
Coordinate System:
NAD 1983 StatePlane Ohio North FIPS 3401 Feet

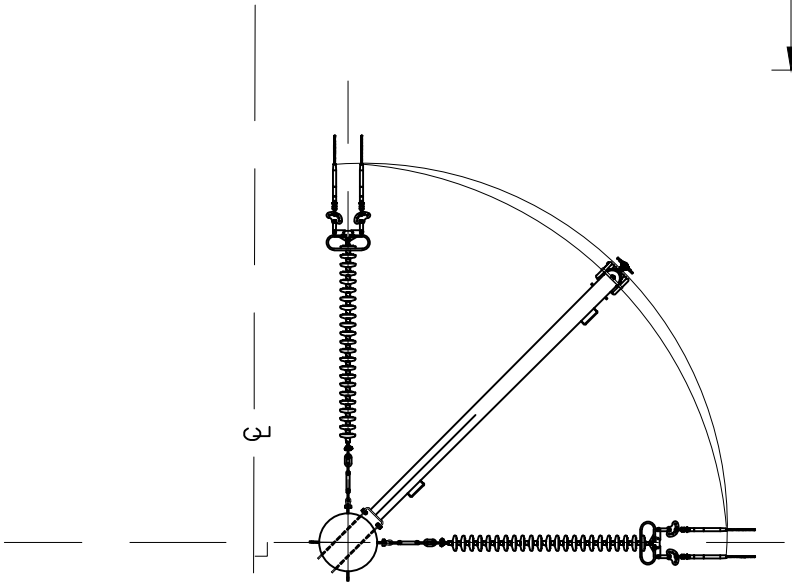
Exhibit 2

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

Bloomingville 345 kV Transmission Line Loop to Bloomingville Substation Project


#41801
DAVIS BESSE SUBSTATION
BEAVER - HAYES 345kV LINE
BLOOMINGVILLE - DAVIS BESSE 345kV LINE
AVERY - HAYES 138kV LINE
ERIE CO, OH
N/F
MATTHIAS MARY M TRUSTEE
N/F
ST JOHN'S UNITED CHURCH
OF CHRIST MILAN OHIO INC
#41800B
#41800A
#41800
150'
75'
BEAVER - HAYES 345kV LINE
BEAVER - BLOOMINGVILLE 345kV LINE
BEAVER SUBSTATION
BLOOMINGVILLE SUB
N/F
DEERING FARMS, INC.
N/F
WENSINK CRISTOPHER N TR
THOMAS RD
FIRELANDS WIND LLC
LEGEND
- NEW OR REPLACED STRUCTURE
- EXISTING STRUCTURE
- EXISTING TOWER
- PROPERTY LINE
- RIGHT OF WAY (APPROX.)
- DRAINAGE DITCH
- TRANSMISSION CENTERLINE
- EXISTING TRANSMISSION LINE
- PAVED ROADWAY
- SUBSTATION FENCE
BEAVER – BLOOMINGVILLE 345kV
BLOOMINGVILLE – DAVIS BESSE 345kV
GENERAL LAYOUT
ATSI
ASSET/OP. CO.
ATSI/OE
DWG NO.
EXHIBIT 3
SHEET
1/1
REV.
PAPER SIZE: 17X11





SECTION A-A

ATSI American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.	BLOOMINGVILLE SUBSTATION 345KV TRANSMISSION LINE PROJECT
SINGLE CIRCUIT VERTICAL DEADEND STEEL MONOPOLE STRUCTURE	
EXHIBIT 4	SCALE: NTS

PAPER SIZE: 8.5X11

EXHIBIT 5

In reply, refer to
2019-HUR-43954

August 27, 2025

Robert Chidester, Ph.D.
Mannik & Smith Group
1800 Indian Wood Circle
Maumee, OH 43537
rchidester@manniksmithgroup.com

RE: Emerson Creek Wind Project, Groton Township, Erie County, and Lyme, Norwich, and Sherman Townships, Huron County, Ohio – Sixth Addendum Report

Dear Dr., Chidester:

This letter is in response to the correspondence received on July 9, July 18, and August 18, 2025, regarding the proposed Emerson Creek Wind Project located in Erie and Huron Counties, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-4 & 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The following comments pertain to the *Sixth Addendum Report: Additional Phase I Archaeological Survey for the Emerson Creek Wind Project in Groton and Oxford Townships, Erie County, and Lyme, Norwich, and Sherman Townships, Huron County, Ohio* (Chidester et al. 2025). A literature review, visual inspection, surface collection, and shovel test unit excavations were conducted for these addendum investigations. There were twelve (12) previously documented archaeological sites located within the sixth addendum project area (33HU0012, 33HU0223, 33HU0626, 33HU0658, 33HU659, 33HU0847, 33HU0849, 33HU0851, 33HU0688, 33HU0689, 33HU0800, 33HU0865). Sites 33HU0012, 33HU0223, 33HU0659, and 33HU0849 were previously recommended for avoidance; however, no additional artifacts associated with these sites were encountered during the current investigations. An avoidance plan has been submitted to our office regarding these sites and will be reviewed separately. The current survey identified nine (9) new Ohio Archaeological Inventory (OAI) sites (33ER0783, 33ER0784, and 33HU0914-33HU0920). These sites were largely small lithic scatters and isolated finds. 33HU0847 was also re-identified during these investigations; however, none of the other previously documented sites were encountered. It is MSG's recommendation that these ten (10) sites are not eligible for the National Register of Historic Places (NRHP). Our office agrees with these recommendations.

The following comments pertain to the *Seventh Addendum Report: Additional Phase I Archaeological Survey for the Emerson Creek Wind Project in Groton and Oxford Townships, Erie County, and Lyme, Norwich, and Sherman Townships, Huron County, Ohio* (Chidester et al. 2025). A literature review, visual inspection, surface collection, and shovel test unit excavations were conducted for these addendum investigations. There were eight (8) previously documented archaeological sites located within the addendum project areas (33HU0038, 33HU0270, 33HU0274, 33HU0804, 33HU0349, 33HU0622, 33HU0641, 33HU0725,). The current survey identified thirteen (13) new archaeological sites (33HU0910-33HU0913, 33HU0921-33HU0926, and 33SE1031-33SE1033), as well as two (2) previously documented archaeological sites (33HU0270 and 33HU0274). The remaining previously documented archaeological sites were not re-identified during the current survey. It is MSG's recommendation that these fifteen (15) sites are not eligible for the NRHP. Our office agrees with these recommendations for 33HU0910-33HU0911, 33HU0913, 33HU0921-33HU0926, and 33SE1031-33SE1033. No additional work is recommended for these twelve (12) sites.

Site 33HU0270 is a large, pre-contact lithic scatter originally documented as a Pipe Creek chert workshop by Randy Yingling, a local avocational archaeologist. The current survey expanded the site's boundaries into Survey Area 6WW, as

well as the intervening area between Survey Area 6WW and the site's previously delineated boundaries. This survey investigated a small portion of the site's overall boundaries; therefore, its eligibility cannot be assessed at this time. At present, the proposed construction within Survey Area 6WW consists of a temporary turn lane. Because construction is limited to a small portion of 33HU270, it is MSG's opinion that the temporary turn lane will have no adverse effect on this site. Our office agrees with this recommendation; however, additional investigations would be recommended if the construction is modified.

Site 33HU0274 is a multi-component site consisting of a large pre-contact lithic scatter and a small post-contact isolated find. Randy Yingling also originally documented this site based on landowner reports and collections, but the current survey better defined its boundaries. It is MSG's recommendation that this site is not eligible for the NRHP; however, our office does not possess enough information at this time to agree. We recommend avoidance or additional investigations for the impacted portions of 33HU0274.

Site 33HU0912 is a moderate prehistoric lithic scatter (N=37) that likely represents a short-term occupation for stone tool manufacture and/or maintenance. It is located approximately 15 m north of 33HU0844, a similarly sized lithic scatter identified during previous investigations for this project (Hickle et al. 2021). Our office previously agreed that 33HU0844 was not eligible for the NRHP in a letter dated November 19, 2021; however, we are curious about the potential relationship between 33HU0912 and 33HU0844 and recommend avoidance or additional investigations for 33HU0912. The additional investigations may follow a tiered approach, in which the first tier involves a geophysical survey (fluxgate gradiometer or equivalent instrument) of 33HU0912 and the intervening area between it and 33HU0844 to locate potential subsurface features. If anomalies are encountered, additional testing would be warranted to determine whether the anomalies are cultural features; however, if no anomalies are identified during the geophysical survey, our office would consider those results sufficient to comment on the site's eligibility. The survey results will allow for a more informed decision concerning the effects the project may have on historic properties. The survey must be conducted by a qualified consultant and a copy of the results of the survey must be submitted to the SHPO for review following our submission standards.

Our office looks forward to additional coordination regarding the Emerson Creek Wind Project. If you have any questions, please contact me at cgullett@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Catherine Gullett, Project Reviews Coordinator
Resource Protection and Review
State Historic Preservation Office

RPR Serial Nos. 1109862 and 1110002

EXHIBIT 6

DICKINSON WRIGHT PLLC

180 E. Broad Street, Suite 3400
Columbus, OH 43215-3192
Telephone: (614) 744-2570
Facsimile: (844) 670-6009
http://www.dickinsonwright.com

July 18, 2025

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, OH 43215

Re: **Case Nos. 18-1607-EL-BGN, 21-1055-EL-BGA, 24-845-EL-BGA, 25-495-EL-BGA, 25-527-EL-BGA, 19-1073-EL-BTX, and 23-650-EL-BTA -** In the Matter of the Application of Firelands Wind, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Wind-Powered Electric Generation Facility and Transmission Facility in Huron and Erie Counties, Ohio.

Condition Compliance – Archaeological Survey Report for Third Amendment

Dear Ms. Troupe:

Firelands Wind, LLC ("Firelands") is certified to construct a wind-powered electric generation facility and a transmission facility in Huron and Erie Counties, Ohio, in accordance with the orders issued by the Ohio Power Siting Board ("OPSB") in the above-referenced cases.

At this time, in compliance with the commitments in the Application filed on April 28, 2025 and the OPSB order issued on June 26, 2025, in Case No. 25-495-EL-BGA, Firelands is filing a copy of the attached Phase I Archaeological Survey Report. This information was provided to OPSB Staff on July 18, 2025.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)
Terrence O'Donnell (0074213)
Matthew C. McDonnell (0090164)
Dickinson Wright PLLC
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todonnell@dickinsonwright.com
mmcdonnell@dickinsonwright.com
Attorneys for Firelands Wind, LLC

cc: Jim O'Dell
Michael Williams
Chris Douglass
Jon Pawley
Grant Zeto

PHASE I ARCHAEOLOGICAL SURVEY

SIXTH ADDENDUM REPORT
EMERSON CREEK WIND PROJECT
ERIE AND HURON COUNTIES, OHIO

JULY 2025

PREPARED FOR:
FIRELANDS WIND, LLC
120 GARRETT ST., SUITE 700
CHARLOTTESVILLE, VIRGINIA 22902

PREPARED BY:
THE MANNIK & SMITH GROUP, INC.
1800 INDIAN WOOD CIRCLE
MAUMEE, OHIO 43537

Sixth Addendum Report: Additional Phase I Archaeological Survey for the Emerson Creek Wind Project in Groton and Oxford Townships, Erie County, and Lyme, Norwich and Sherman Townships, Huron County, Ohio

Submitted by:

Dr. Robert C. Chidester, RPA
Project Manager

Prepared by:

Robert C. Chidester, Ph.D., Principal Investigator
Adam R. Darkow, B.A.
Kate J. Hayfield, B.S.
Meagan N. Bell, M.P.S., RPA
Julia R. Joblinski, B.A.

The Mannik & Smith Group, Inc.
1800 Indian Wood Circle
Maumee, Ohio 43537

Prepared for:

Firelands Wind, LLC
120 Garrett St., Suite 700
Charlottesville, Virginia 22902

Lead Agency:

Ohio Power Siting Board

July 2025

EXECUTIVE SUMMARY

From April 29 – July 8, 2025, MSG completed additional Phase I archaeological reconnaissance survey of approximately 78 ac (31.6 ha) for the proposed Emerson Creek Wind Project (Project) in Groton and Oxford townships, Erie County, and Lyme, Norwich and Sherman townships, Huron County, Ohio. The siting and construction of the proposed wind energy generation facilities will be permitted by the Ohio Power Siting Board (OPSB) under Chapter 4906 of the Ohio Revised Code. The survey strategy used was the same as was used for the original survey of approximately 3,139 ac (1,270 ha) for the Project.

For the purposes of the Phase I archaeological survey, additional 7.5-m (25-ft) buffers were surveyed where proposed access roads and underground collection lines came within this distance of the edge of previously surveyed corridors. In additional, several new LiDAR and meteorological tower locations and several locations of proposed road widening (within existing public right-of-way) were surveyed. As a result of the additional survey efforts, MSG recorded nine new archaeological sites (designated as sites 33ER0783, 33ER0784, and 33HU0914 – 33HU0920) and additional data regarding one previously documented site (33HU0847). Twelve previously documented sites overlapping the current survey areas were not re-located.

MSG evaluated all 10 sites encountered within the current survey areas against the criteria for listing on the National Register of Historic Places (NRHP) (36 CFR 60.4). Based on the results of the additional survey efforts, the archaeological sites documented in this report do not appear to be eligible for the NRHP. No further investigations of these sites are recommended. MSG's previous evaluations and recommendations for the 12 sites that were not re-located remain the same as presented in previous reports.

TABLE OF CONTENTS

FIGURES

TABLE OF CONTENTS (Continued)

SECTION: **PAGE NO.:**

TABLE OF CONTENTS (Continued)

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TABLES

APPENDICES

1.0 INTRODUCTION

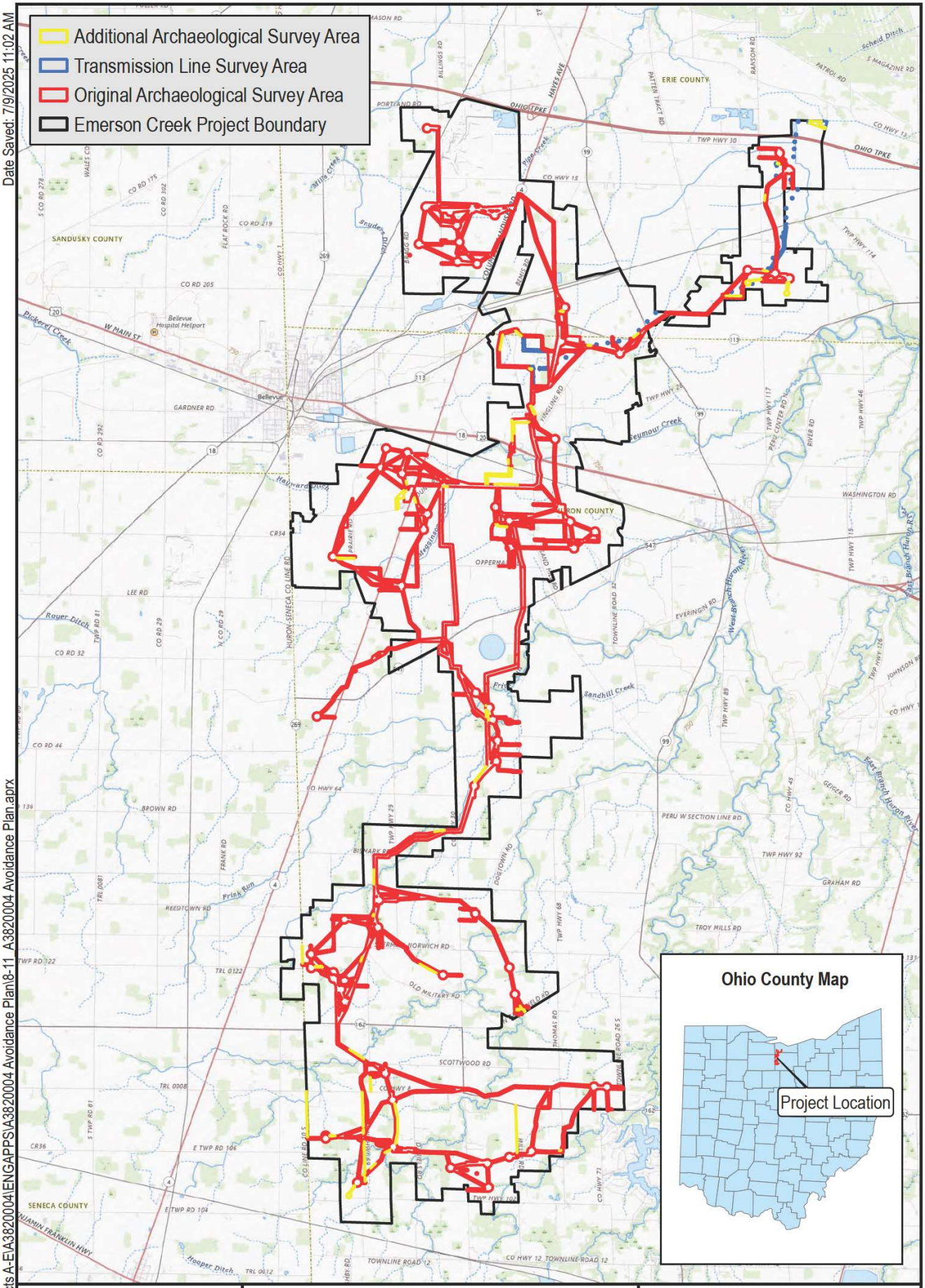
In October 2019, Firelands Wind, LLC (Firelands Wind) contracted The Mannik & Smith Group, Inc. (MSG) to complete a Phase I archaeological survey of the proposed Emerson Creek Wind Project (Project) in Groton and Oxford townships, Erie County, and Lyme, Norwich, Ridgefield and Sherman townships, Huron County, Ohio (Figure 1.1). The siting and construction of the proposed wind energy generation facilities will be permitted by the Ohio Power Siting Board (OPSB) under Chapter 4906 of the Ohio Revised Code, which requires the OPSB to take cultural resources into consideration as part of the application filing requirements for wind energy generation projects.

MSG completed an initial survey of the Project from December 2019 – July 2020 (Chidester, Hayfield et al. 2021). As a result of this survey, MSG recorded 271 archaeological sites within the survey area (including 11 previously recorded sites). An additional 13 previously recorded archaeological sites mapped within the survey area could not be re-located by MSG. Subsequent revisions to the Project design resulted in the addition of approximately 679 ac (275 ha) outside of the original 3,139 ac (1,270 ha) survey area that may be impacted by Project construction. MSG surveyed this additional acreage from March 2021 – June 2024, recording an additional 66 new archaeological sites and additional information regarding 21 previously recorded sites. These results were reported in five separate addendum reports (Chidester, Hickle et al. 2021; Hickle et al. 2021; Hickle et al. 2023; Chidester et al. 2023; Hickle et al. 2024).

This report presents the results of a sixth round of additional survey efforts for the Emerson Creek Wind Project, covering revised facility design in 66 locations in Groton, Oxford, Lyme, Norwich, and Sherman townships (Figure 1.2). The total acreage surveyed during this round of survey is 78 ac (31.6 ha). Previous surveys for the Emerson Creek Wind Project have divided the Project Area into 12 smaller Survey Sectors; the additional survey efforts reported here occurred in Sectors 1, 2, 5, 6, 7, 8, 9, 10, 11, and 12 (Figure 1.2). For the purposes of the Phase I archaeological survey, additional 7.5-m (25-ft) buffers were surveyed where proposed access roads and underground collection lines came within this distance of the edge of previously surveyed corridors. In additional, several new LiDAR and meteorological tower locations and several locations of proposed road widening (within existing public right-of-way) were surveyed.

Section 2 of this report presents the results of the additional survey efforts, while Section 3 provides a summary of the survey results and National Register of Historic Places (NRHP) eligibility evaluations. Appendices include a photograph log, an artifact catalog, and Ohio Archaeological Inventory (OAI) forms for each site recorded during the additional survey efforts. Since the background research, field and laboratory methodology, and approach to NRHP eligibility evaluation were all presented in the original survey report (Chidester, Hayfield et al. 2021), these sections will not be reproduced here.

Dr. Robert Chidester, RPA, served as MSG's Project Manager and Principal Investigator for this survey. Elizabeth Hickle, B.S., and Adam Darkow, B.A., served as the Field Directors, and were assisted during fieldwork by field technician Austin Forgash. Meagan Bell, M.P.S., RPA, served as the Laboratory Director, and was assisted in artifact processing by laboratory technician Timothy McCauley. Bell and Project Archaeologist Julia Joblinski, B.A., cataloged the recovered artifacts. Bryan Agosti, M.A., served as the GIS coordinator for the project, with assistance from Bell. Chidester and Darkow are the primary authors of this report. Graphics and appendices were prepared by Darkow, Bell, Joblinski, and Project Archaeologist Kate Hayfield, B.S. Darkow prepared the OAI forms in Appendix C.



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Mannik Smith GROUP
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www.MannikSmithGroup.com

Figure 1.1
Project Location
Emerson Creek Wind Project
Erie and Huron Counties, Ohio

0 1 2 mi
0 2 4 km

Map Credits:
30' North-Central, OH US Topographic Map provided by ESRI, accessed July 2025.

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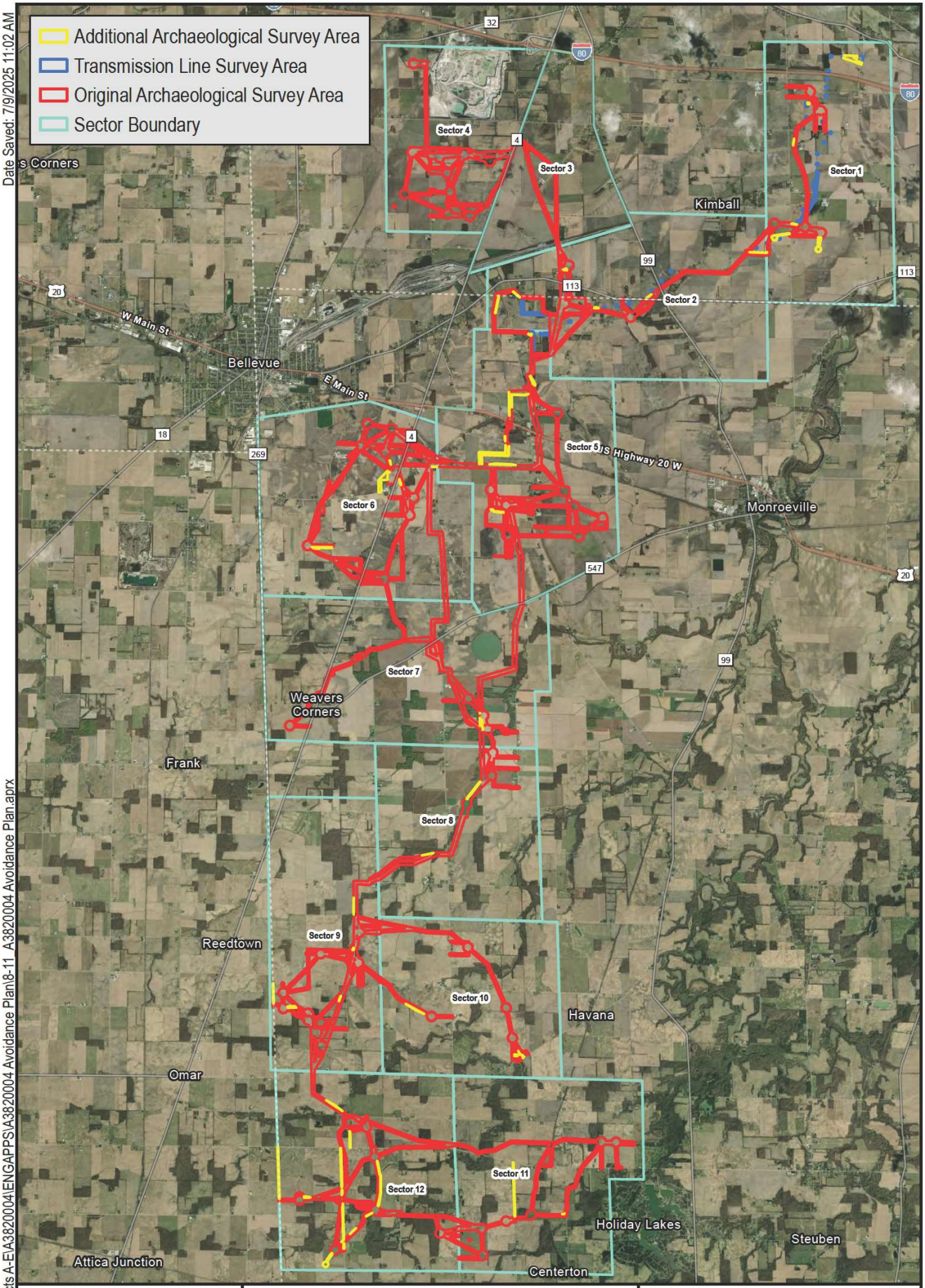

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Figure 1.2
Archaeological Survey Areas
Emerson Creek Wind Project
Erie and Huron Counties, Ohio

0 1 2 mi
0 2 4 km

Map Credits:
North-Central, OH aerial imagery provided by ESRI, accessed July 2025.

N

2.0 SURVEY RESULTS

The sixth round of Phase I archaeological survey was completed from April 29 – July 8, 2025. As a result of these efforts, MSG recorded nine new archaeological sites and recorded additional data regarding one previously recorded archaeological site. The results of the survey within individual survey sectors are described below, along with summary descriptions of each recorded archaeological site. Sites that appear to be potentially eligible for the NRHP are described in more detail. OAI forms have been completed for each site recorded during the survey. For the purpose of summary description, the following definitions apply to site descriptions used in this section of the report:

- An isolated find is a site consisting of a single artifact (either pre-contact or post-contact) with no accompanying cultural features.
- A small lithic scatter is a pre-contact site at which fewer than 20 artifacts were collected.
- A moderate lithic scatter is a pre-contact site at which between 20 and 100 artifacts were collected.
- A large lithic scatter is a pre-contact site at which more than 100 artifacts were collected.
- A small post-contact scatter is a post-contact site at which fewer than 50 artifacts were collected.
- A moderate post-contact scatter is a post-contact site at which between 50 and 200 artifacts were collected.
- A large post-contact scatter is a post-contact site at which more than 200 artifacts were collected.

2.1 Sector 1

Six additional survey areas were examined in Sector 1 (Appendix A, Photos 1-13). Alphanumeric Survey Area designations for Sector 1 are indicated on Figure 2.1, while survey methods and results are depicted on Figures 2.2-2.5. One additional archaeological site was identified in Sector 1 during the additional survey for the Emerson Creek Wind generation facilities.

2.1.1 33ER0783 (Field Site ELH111)

33HU0783 (Field Site ELH111) is a large post-contact artifact scatter that was identified in Survey Area 1RR A total of 648 artifacts were collected from this site, including ceramic, glass, masonry, metal, plastic, and "other" objects. Glass container fragments of various colors are the most common artifact type (n=465, 72%). Temporally diagnostic artifacts include whiteware sherds with transfer-print patterns in various colors (mid-19th century), a ground-rim glass jar fragment (1858-1910), stoneware crock sherds with Albany slip on both sides (1880s-1890s), stoneware crock sherds with Bristol slip (1890-1920), machine-made, solarized glass container fragments (1903-1914), machine-made, aqua-tinted glass container fragments (1903 – ca. 1930), a straw-tinted glass container fragment with stippling on the base (1940s-1950s), and colorless "Duraglas" container fragments (1940-1964). Other notable artifacts include a rubber shoe sole, a porcelain drawer knob, and a dry-cell battery (Appendix B, Table B2; see also Appendix A, Photos 152-157).

No structures are shown in the location of 33ER0783 on any of the historic maps consulted for this project (Stewart & Page 1874; Atlas Publishing Company 1896; U.S. Geological Survey [USGS] 2019). An initial shovel test pit (STP) excavated in the approximate center of the site revealed a soil profile with the Ap horizon extending to a depth of 30 cm (11.8 in) (Appendix A, Photo 6). Thirty-three artifacts were recovered from this STP, all from the Ap horizon. Due to the density of the surface artifact scatter, a transect of four additional STPs was excavated along the long axis of the site (see Figure 2.3); only 10 additional artifacts were recovered from the Ap horizon of one of these STPs.

Site 33ER0783 may represent the well plowed-over remains of a primary refuse deposit from the Hindley/Hinley farmstead, or – perhaps more likely – the use of household waste as agricultural fertilizer (see Roberts and Barrett 1984; Gibb 2020). While other archaeological resources associated with the historic farmstead may exist outside of the Survey Area, sites such as 33ER0783 in and of themselves rarely meet the criteria for NRHP eligibility. While additional investigation of this site would undoubtedly result in the recovery of additional artifacts, the data represented by these artifacts would be redundant with the data already collected. Therefore, this site does not meet Criterion D for NRHP eligibility. Furthermore, it does not appear to be associated with important persons or events in local or regional history, and it does not provide new or important information regarding architecture or the use of space on Erie County farmsteads. Therefore, 33ER0783 does not appear to be eligible for the NRHP, and no further investigation is recommended.

2.2 Sector 2

Six additional survey areas were examined in Sector 2 (Appendix A, Photos 14-27). Alphanumeric Survey Area designations for Sector 2 are indicated on Figure 2.6, while survey methods and results are depicted on Figures 2.7-2.12. One additional archaeological site was identified in Sector 2 during the additional survey for the Emerson Creek Wind generation facilities. Previously documented site 33HU0851, located in Survey Area 2NN, was not re-located during the current survey and will be briefly addressed below.

2.2.1 33ER0784 (Field Site ELH116)

33ER0784 (Field Site ELH116) is small prehistoric lithic scatter identified in Survey Area 2RR. Just two pieces of lithic debitage made of Pipe Creek chert were recovered from this site (Appendix B, Table B1). Neither of these artifacts are temporally diagnostic. An STP excavated within the site exhibited a typical Ap/B stratigraphic soil profile, with the plow zone extending to a depth of 23 cm (9.1 in); the STP did not produce any artifacts (Appendix A, Photo 20). No evidence indicative of the presence of subsurface features (e.g., soil staining, fire-cracked rock) was observed at this site. 33ER0784 appears to represent a short-term occupation of the locale for stone tool maintenance. It is unlikely that significant additional deposits are present at this site. Therefore, 33ER0784 does not appear to be eligible for listing on the NRHP. No further investigation of this site is recommended.

EXHIBIT 7

Department of Natural Resources
ohiodnr.gov

Mike DeWine, *Governor*
Jim Tressel, *Lt. Governor*
Mary Mertz, *Director*

Office of Real Estate & Land Management
Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

June 15, 2026

Brendan Rick
GAI Consultants
385 E. Waterfront Drive
Homestead, Pennsylvania 15120-5005

Re: 26-0813_FE-AC2-103 Loop Line

Project: The proposed project involves installing a transmission line loop between the proposed Bloomingville Substation and an existing 345 kilovolt transmission line, within an approximately 150-foot-wide existing right-of-way.

Location: The proposed project is located in Oxford Township, Erie County, Ohio.

Center Coordinates: (41.3388, -82.6737)

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state, or federal agency nor relieve the applicant of the obligation to comply with any local, state, or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following data within one mile of the project area:

Prairie False Indigo (*Baptisia lactea*), P
Broad-winged Sedge (*Carex alata*), P
Carolina Flat-topped Goldenrod (*Euthamia caroliniana*), T
Least St. John's-wort (*Hypericum gymnanthum*), E
American Water-milfoil (*Myriophyllum sibiricum*), E
Virginia Meadow-beauty (*Rhexia virginica*), P
Showy Goldenrod (*Solidago speciosa*), T
Lance-leaved Violet (*Viola lanceolata*), P
Upland Sandpiper (*Bartramia longicauda*), E

Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened. The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Features searched include locations of rare and endangered plants and animals determined to be of value to the conservation of their species, high quality plant communities, animal breeding assemblages, and outstanding geological features.

The species listed above are not recorded within the boundaries of the specified project area. However, please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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

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

The project is within the vicinity of records for the little brown bat (*Myotis lucifugus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree clearing is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree clearing inside this buffer may be acceptable after further consultation with DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in clusters of dead leaves on tree limbs. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree and/or tree limb clearing only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with a Diameter Breast Height (DBH) ≥ 20” if possible.

For every project, the DOW also recommends that a winter bat habitat assessment is conducted to determine if potential hibernacula are present within the project area. This is to limit possible disturbances that seasonal tree clearing and/or subsurface work (e.g., trenching, blasting, etc.) may cause to hibernating bats. Potential hibernacula include rocky outcroppings, caves, and underground mines. Direction on how to conduct winter habitat assessments can be found in the joint guidance OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE (OH-FIELD OFFICE) JOINT GUIDANCE FOR BAT SURVEYS. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile permanent tree clearing buffer around the hibernaculum entrance. Limited summer or winter tree clearing may be acceptable after consultation with the DOW. If a habitat assessment for projects involving subsurface disturbance finds that a potential hibernaculum is present within 5 miles of the project area, please consult with Eileen Wyza for project recommendations. If no tree clearing or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the eastern pondmussel *(Ligumia nasuta*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

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

State Endangered
brook trout (*Salvelinus fontinalis*)
longnose sucker (*Catostomus catostomus*)
lake sturgeon (*Acipenser fulvescens*)
pugnose minnow (*Opsopoeodus emiliae*)
bigeye shiner (*Notropis boops*)
western banded killifish (*Fundulus diaphanus menona*)

State Threatened
channel darter (*Percina copelandi*)

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

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the Lake Erie water snake (*Nerodia sipedon insularum*), a state threatened species and federal species of concern. Hibernation habitat for this species includes suitable tree roots or hollow tree bases and human-made structures such as walls. If project construction is within 226 feet of the shoreline, excavation activity should not occur during the hibernation season of October 15 to April 15 or when the air temperature is below 60˚ Fahrenheit. Excavation of any kind should be completed only when both air and ground temperatures are above 60˚ Fahrenheit on the day of work and for five consecutive days prior to the day of work. Construction activities including shoreline rip-rap placement should also occur between mid-April and mid-October when the water and air temperatures are above 60˚ Fahrenheit on the day of work and for five consecutive days prior to the day of work. Heavy machinery should be limited to existing roads, ramps, or areas with little or no likelihood of supporting snakes. If the project requires removal of trees >6" dbh that are within the 226 feet zone, only the above-ground portion of the tree should be removed. The root mass should be left

underground so as not to disturb hibernation locations. Rock-filled timber or steel crib docks and rip-rap shoreline protection should be used rather than sheet steel.

Any holes or trenches that are dug should be filled in as soon as possible to prevent water snakes from inadvertently falling into them and becoming trapped. Holes or trenches should be inspected for Lake Erie water snakes prior to being filled. Monitoring should be conducted before and during construction by an individual trained to identify Lake Erie water snakes. The site should be walked daily prior to any earthmoving activity to ensure no water snakes are within the work area. If Lake Erie water snakes are encountered during winter excavation, operations should cease immediately and the monitoring individual should contact Matt Stooksbury, DOW Compliance Coordinator at 614-265-7017, and the U. S. Fish and Wildlife Service's Columbus, Ohio, Field Office at (614-416-8993). If the project does not contain suitable hibernation habitat (e.g., locations composed purely of topsoil covered by short grasses and forbs with no cracks or crevices present), ground disturbing activities during the hibernation period (October 15 to April 15) are not likely to impact the species.

The project is within the range of the Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as it moves from one wetland to the next. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

The project is within the range of the northern harrier (*Circus hudsonius*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

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

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

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

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

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

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

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

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

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

EXHIBIT 8

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
Phone: (614) 416-8993 Fax: (614) 416-8994

In Reply Refer To: 04/15/2026 20:51:24 UTC
Project Code: 2026-0077150
Project Name: AC2-103 Interconnect loop line

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Requests for additional technical assistance or consultation from the Ohio Field Office should be submitted following guidance on the following page https://www.fws.gov/office/ohio-ecological-services/request-project-review. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

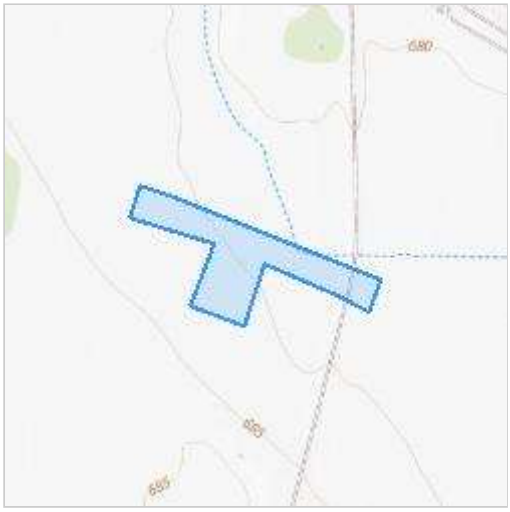
This species list is provided by:

Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
(614) 416-8993

PROJECT SUMMARY

Project Code: 2026-0077150
Project Name: AC2-103 Interconnect loop line
Project Type: Distribution Line - New Construction - Above Ground
Project Description: The project involves installing a loop line to and existing transmission line from a proposed substation
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@41.33906,-82.67384134814733,14z



Counties: Erie County, Ohio

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered

BIRDS

NAME	STATUS
Rufa Red Knot *Calidris canutus rufa* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened
Whooping Crane *Grus americana* Population: Eastern Migratory NEP - U.S.A. (AL, AR, FL, GA, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, OH, SC, TN, VA, WI, WV) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: GAI Consultants, Inc.
Name: Brendan Rick
Address: 385 E. Waterfront Dr.
City: Homestead
State: PA
Zip: 15120
Email b.rick@gaiconsultants.com
Phone: 4124762000

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
Phone: (614) 416-8993 Fax: (614) 416-8994

In Reply Refer To: 04/15/2026 20:53:47 UTC
Project code: 2026-0077150
Project Name: AC2-103 Interconnect loop line

Subject: Technical Assistance letter for the project named 'AC2-103 Interconnect loop line' for specified threatened and endangered species that may occur in your proposed project location consistent with the All Ohio Determination Key (DKey)

Thank you for using the assisted determination keys in IPaC. This letter is provided pursuant to the U.S. Fish and Wildlife Service's (Service's) authority under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA). On April 15, 2026, Brendan Rick used the All Ohio Bat DKey; dated February 09, 2026, in the Service's online IPaC application to evaluate potential impacts to federally listed bat species, from a project named 'AC2-103 Interconnect loop line'.

Due to the project, type, size, and location, the Service does not have any concerns regarding federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, please contact us for additional project review.

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

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

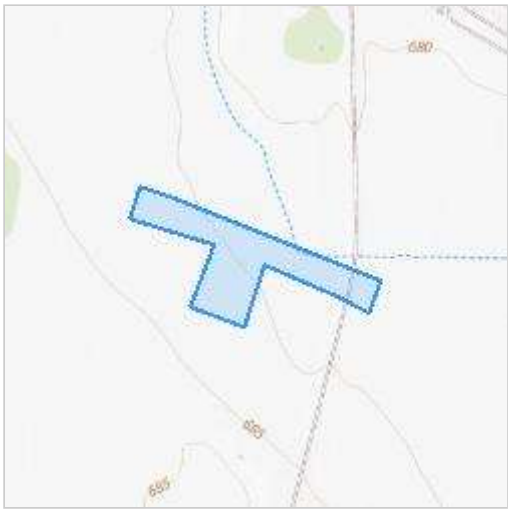
AC2-103 Interconnect loop line

2. Description

The following description was provided for the project 'AC2-103 Interconnect loop line':

> The project involves installing a loop line to and existing transmission line from a proposed substation

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@41.33906,-82.67384134814733,14z



QUALIFICATION INTERVIEW

1. Does the project involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) known or suspected to contain roosting bats?

   No

2. Does the project involve **building, maintaining or repairing** a communications tower?

   No

3. Is this an Ohio Department of Transportation (ODOT) project with an assigned ODOT PID?

   No

4. Does the project fall under the "FHWA, FRA, FTA Programmatic Consultation for Transportation Project affecting IBAT, NLEB, or TCB"?

   No

5. Does the project involve the modification, replacement or removal of an existing bridge or culvert?

   No

6. Does the project involve purposeful take of listed bats (including for scientific purposes, or to enhance the survival of a species)?

   No

7. Will the project involve blasting?

   No

8. Does the project involve the installation or operation of wind turbines and/or solar panels?

   No

9. Does the project involve aerial or other large-scale application of any chemical (including insecticide, herbicide, biopesticide, etc.)?

   No

10. Is this project part of a larger phased project?

    No

11. Does the project involve prescribed fire?

    No

12. Does the Project Area contain any known or potential hibernacula (natural caves, mines, rocky outcroppings, tunnels, or underground quarries)?

    No

13. Does the project involve clearing or trimming trees ≥5" dbh?

    No

IPAC USER CONTACT INFORMATION

Agency: GAI Consultants, Inc.
Name: Brendan Rick
Address: 385 E. Waterfront Dr.
City: Homestead
State: PA
Zip: 15120
Email b.rick@gaiconsultants.com
Phone: 4124762000

EXHIBIT 9

Field Report Memo

Date:	May 20, 2026
Project No.	R210514.08, Task 001
Project Name:	AC2-103 Interconnect Project, Erie County, Ohio

Summary of Events

On July 23, 2025, GAI Consultants, Inc. (GAI), on behalf of American Transmission Systems, Inc. (ATSI), conducted an environmental resource survey for wetlands and streams within the approximately 4.5-acre study area for the AC2-103 Interconnect Project (Project) in Erie County, Ohio (OH). The Project involves installing a proposed tap line to an existing transmission line from the proposed AC2-103 interconnect switch yard.

Review of existing data indicates the Project area is within the Sawmill Creek Hydrologic Unit Code 12 (041000110101) Watersheds. Land use surrounding the Project study area primarily consists of agricultural fields surrounded by fragmented forest and transmission line right of way. Attachment 1 depicts the Project area.

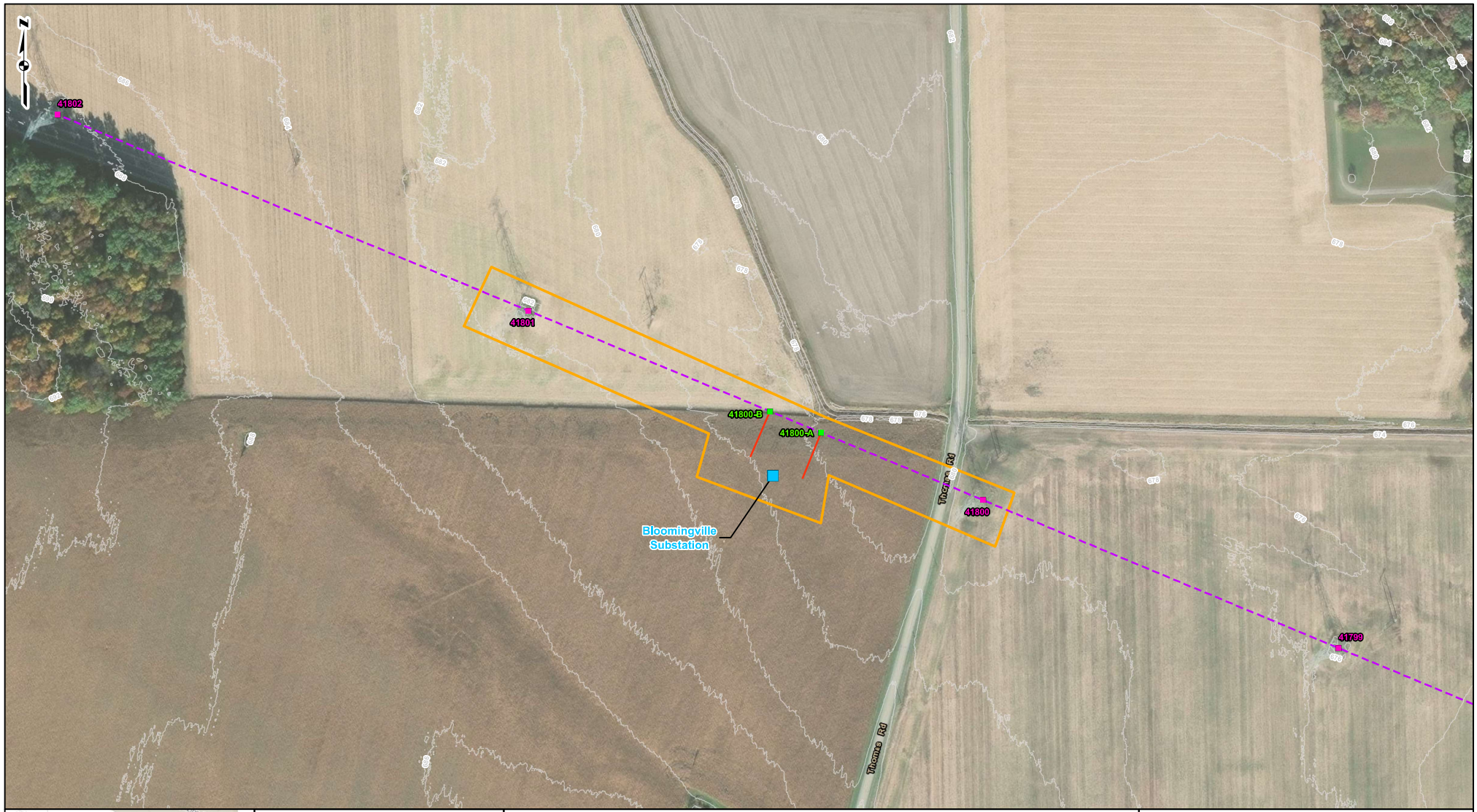
Wetland and Stream Field Survey Results

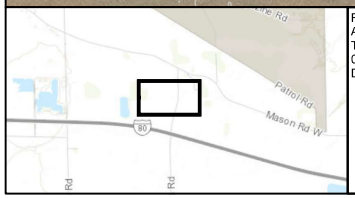
The study area was reviewed for wetlands according to the 1987 United States Army Corps of Engineers (USACE) *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region* (Version 2.0). Prior to the environmental field review, GAI obtained and reviewed United States Geological Survey topographic mapping, National Wetlands Inventory database, National Hydrography Dataset (NHD), and the United States Department of Agriculture-Natural Resources Conservation Service's soil mapping to supplement the field data. No NHD streams or National Wetlands Inventory wetlands were identified within the Project area.

No streams or wetlands were identified during the environmental resource study. The results of the wetland and stream survey are displayed on the Feature Overview Map in Attachment 1and representative photographs of the identified features are provided in Attachment 2.

ATTACHMENT 1

PROJECT OVERVIEW MAP





REFERENCE: WORLD IMAGERY, MAXAR (2025), ESRI, ARCGIS ONLINE, ACCESSED 05/2026. WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 05/2026. CONTOUR DATA, DERIVED FROM OGRIP DEM, DOWNLOADED 2026.

LEGEND

- Proposed Substation
- Existing Structure
- Proposed Structure
- Proposed Tap
- Existing Transmission
- Envrionmental Study Area
- 2-Ft Contour

0 100 200 400 Feet

FEATURE OVERVIEW MAP

AC2-103 TRANSMISSION LINE LOOP PROJECT
AMERICAN TRANSMISSION SYSTEMS, INC
(A FIRSTENERGY COMPANY)

DRAWN BY: MD
CHECKED: KJT
DATE: 5/20/2026
APPROVED: BMR

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ATTACHMENT 2

PHOTOGRAPHS

Photograph 1. Project Area, Facing West (07/23/25)

Photograph 2. Project Area, Facing Southwest (07/23/25)

Photograph 3. Project Area, Facing Northwest (07/23/25)

Photograph 4. Project Area, Facing North (07/23/25)

Photograph 5. Project Area, Facing Northeast (07/23/25)

Photograph 6. Project Area, Facing South (07/23/25)