

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

CONSTRUCTION NOTICE

**CHAMBERLIN SUBSTATION 138 KV STRAIN BUS
STRUCTURE ADDITION PROJECT
OPSB CASE NO.: 20-1710-EL-BNR**

December 8, 2020

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

**CONSTRUCTION NOTICE
CHAMBERLIN SUBSTATION 138 KV STRAIN BUS STRUCTURE ADDITION
PROJECT**

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

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name

Name of Project: Chamberlin Substation 138 kV Strain Bus Structure Addition Project (“Project”).

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to construct a 138 kV strain bus tie at the Chamberlin Substation to connect the existing 138 kV substation yard to the new 345/138 kV transformer installed within the existing 345 kV substation yard. To construct the 138 kV strain bus, one (1) new single steel monopole on concrete foundation will be installed outside the existing substation fence. Approximately 550 feet of new 1590 kcmil 45/7 ACSR bundle conductor will be installed between 138 kV and 345 kV yards of Chamberlin Substation.

The general location of the Project is shown in Exhibit 1, a partial copy of the United States Geologic Survey, Summit County OH, Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery and Exhibit 3 shows the general layout of the Project. The Project is

located in Twinsburg Township, Summit County, at 8530 Chamberlin Road, Twinsburg OH 44056.

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 operation 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 installation of one (1) structure of a transmission line strain bus over a distance of approximately 0.1 mile.

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

The proposed Project is a mandatory PJM RTEP baseline project (b2778) at Chamberlin Substation to resolve NERC, PJM, and FE planning criteria violations identified by PJM. Completion of the PJM baseline project will enhance the reliability, resiliency, efficiency, and operational flexibility of the transmission system in the Project area. The selected solution for the PJM baseline project is to install an additional 345/138 kV transformer at Chamberlin Substation. Construction of the Project and completion of the PJM baseline project will directly improve electric service for approximately 25,445 customers representing approximately 88 MW of load served by the transmission system in the

Project area and provide additional capacity for economic development and load growth in the area.

As shown on Exhibit 3, the Project consists of two components of planned upgrades necessary to achieve the system improvements identified by the PJM baseline project. The two components are:

1. Construct a 138 kV strain bus by installing one (1) new single steel monopole on concrete foundation outside the existing substation fence.
2. Install approximately 550 feet of new 1590 kcmil 45/7 ACSR bundle conductor between the 138 kV and 345 kV yards

Implementation of these two upgrades is required to fully address the system reinforcements identified by the PJM baseline project. More specifically, the PJM baseline project is needed to reinforce ATSI's 138 kV transmission system in the Project area to continue to provide safe and reliable electric service.

The Valley and Theiss 138 kV substations serve a significant number of customers and have two 138 kV sources, the Babb-Valley 138 kV Transmission Line and the Chamberlin-Theiss 138 kV Transmission Line. The Valley 138 kV Substation has four (4) 138/23 kV transformers and the Theiss 138 kV Substation has two (2) 138/23 kV transformers. PJM identified a low voltage criteria violation at both the Valley and Theiss 138 kV substations in the 2016 RTEP 2021 N-1-1 Thermal and Voltage study for a double contingency outage of the Babb-Valley 138 kV line and the Chamberlin 345-138 kV transformer. The contingency will result in a low voltage condition at the substations below the PJM and FE transmission emergency minimum voltage operating requirement resulting in a power outage to approximately 25,445 customers and 88 MW of load served from the substations.

The Project to add a second 345/138 kV transformer at Chamberlin Substation was submitted as a baseline upgrade project to the PJM Regional Transmission Expansion Plan

(RTEP) at the Transmission Expansion Advisory Committee (TEAC) meeting on November 3, 2016. The Project solution will improve operational flexibility and efficiency; reduce the amount of local load loss and strengthen the 138 kV system voltage under Planning Event P6 (loss of the Babb-Valley 138 kV Line and the Chamberlin 345/138 kV transformer) contingency conditions. PJM evaluated the proposed Project and did not identify any additional FirstEnergy or PJM Planning Criteria violations caused by the Project. As such, there is no additional need for other network system upgrades as a result of the project. PJM assigned the Project baseline upgrade identification number b2778. The PJM TEAC presentation slide is included as Exhibit 4 and includes additional details of the project drivers.

The proposed Project is necessary to add a 138 kV bus tie to connect the existing 138 kV substation to the new 345/138 kV transformer to be installed within the existing 345 kV substation yard at Chamberlin.

If the contingency scenarios described above were to take place with the existing transmission system configuration, there is a negative impact to the reliability metrics System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI), and Customer Average Interruption Duration (CAIDI) across the Ohio Edison service region. This negative impact is summarized in Table 1 below. This table assumes a three-hour outage duration. This outage duration was determined based on historic off-hours outage restoration times necessary to assemble a crew, dispatch the crew to the scene, allow the crew time to determine the issue, and then perform switching to restore customers. The impact values provided are for the Ohio Edison region of FirstEnergy.

$$SAIDI = \frac{\sum \text{Customer Minutes Interrupted}}{\sum \text{Customers Served}}$$

$$SAIFI = \frac{\sum \text{Customer Interrupted}}{\sum \text{Customers Served}}$$

$$CAIDI = \frac{\sum \text{Customer Minutes Interrupted}}{\sum \text{Customers Interrupted}}$$

Table 1: Impact to Reliability Metrics

SAIDI Impact	SAIFI Impact	CAIDI Impact	System CAIDI Increase
4.395	0.02442	180	1.4

The Project will mitigate the low voltage condition identified by PJM and improve overall reliability and operational flexibility in the Project area.

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 Chamberlin Substation. The Project area is located approximately 5 inches (11” x 17” printed version) from the right edge of the map and 2 3/4 inches (11” x 17” printed version) from the top of the map. The general location and layout of the Project area are shown in Exhibits 1, 2 and 3.

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

The other alternative that could meet Project objectives include the construction of a new 50 MVAR 138 kV capacitor bank substation at a different location on the Valley-Theiss 138 kV Line, which would require additional land acquisition and increased land-use impacts. Construction of a new 138 kV capacitor bank substation would also require

construction of additional transmission line extensions, which will further increase impacts and costs. In addition, the 138 kV capacitor bank provides limited operational flexibility benefit.

The proposed Project location is best suited for the proposed reinforcement because the Project will occur entirely on ATSI-owned property. Also, ATSI has already purchased the spare transformer which is currently available at the Chamberlin Substation. In addition, the Project increases operational flexibility by allowing transformer and breaker maintenance scheduled outages and provides increased reliability improvements for the broader area by providing an additional source for the area. Last, the substation layout was revised to eliminate the need to reconfigure and relocate the Chamberlin-Hanna 345 kV Transmission Line at Chamberlin Substation, which was referenced in the 2020 Long-Term Forecast Report for the Project (as identified as the PJM Baseline Project). Overall, the 138 kV strain-bus installation proposed in this Project is the most cost effective and least impactful solution to the criteria violations that form the basis for the Project and the mandatory solution approved by PJM in Baseline Project (b2778).

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 Project website and will continue to work with property owners concerning the proposed Project. The website address is below:

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

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

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

The construction schedule for this Project is expected to begin no earlier than March 9, 2021 and be completed by June 1, 2021.

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

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

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

The Project is located entirely within property (Parcel No. 6201323) owned by Ohio Edison Company, a FirstEnergy company. No additional property easements, options, or land use agreements will be necessary to construct or operate 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: 138 kV
- Conductors: 1590 kcmil 45/7 ACSR (bundle)
- Static Wire: 7#8 Alumoweld
- Insulators: Porcelain/Glass
- ROW: Varies
- Structure Types: Exhibit 5: Steel Monopole

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

The closest occupied residence or institution is approximately 335 feet from the proposed transmission line centerline therefore 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 \$517,450 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 Twinsburg Township, Summit County, Ohio. The main land use around the Project is industrial. No significant changes or impacts to the current land use are anticipated.

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

Agricultural land does not exist within the Project area.

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

As part of the investigation for this application, 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 6.

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

The results of the search indicate that no listed NRHP sites and no NRHP eligible sites were identified within 0.5 mile of the Project potential disturbance area.

The OHPO database also includes listings on the Ohio Archaeological Inventory (“OAI”), the Ohio Historic Inventory (“OHI”), previous cultural resource surveys, and the Ohio Genealogical Society (“OGS”) cemetery inventory. The results of the search indicate that one (1) listed structural resource (listed in Table 2) and no OAI archaeological resource were identified within 0.5 mile of the Project potential disturbance area. No OAI site boundary and no historic area that was previously surveyed are located within 0.5 mile of the Project area. Three (3) previous cultural resource surveys were conducted within 0.5 mile of the Project area and are identified in Table 3. One (1) OSG cemetery is located within 0.5 mile of the Project area (listed in Table 4). One National Registry (“NR”) Boundary is located within 0.5 mile of the Project area (listed in Table 5).

Table 2. List of OHI Listed Structural Resources

OHI Number	Name	Historic Use	County	Municipality
SUM0162402	Jackson Comfort System/Maxam William House	Single Dwelling	Summit, Ohio	Twinsburg

Table 3. List of Previous Cultural & Historic Resource Survey

Year	Name	County	Municipality
2014	Phase I Archaeological Survey for the Twinsburg West Wireless Cellular Tower in the City of Twinsburg, Summit County, Ohio	Summit, Ohio	Twinsburg
2004	Phase I Archaeological Survey for the Proposed Twinsburg USARC Facility, Twinsburg Township, Summit County, Ohio	Summit, Ohio	Twinsburg
1989	A Phase I and Phase II Archaeological Survey of the Proposed Chamberlin Substation, Twinsburg Township, Summit County, Ohio	Summit, Ohio	Twinsburg

Table 4. List of Ohio Genealogical Society Cemeteries

OGS ID	Name	County	Municipality
11517	Burroughs	Summit, Ohio	Macedonia

Table 5. List of NR Boundaries

District Name	Number of Properties	County	Municipality
Longwood Manor	4	Summit, Ohio	Macedonia

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

No additional government agency authorizations are expected to be needed for this Project.

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

The Project work limits associated with the structure addition are within the existing maintained transmission line corridor. The construction site will be accessible via existing roads. There is no in-stream work or wetland encroachment proposed with this Project. Some tree clearing will be required to facilitate the Project. This tree clearing will occur prior to March 15, 2021.

As part of the investigation, a request was submitted to the Ohio Department of Natural Resources-Division of Wildlife (“ODNR) to research the presence of any endangered, threatened, or rare species within the Project area. To date, a response from ODNR has not been received.

According to the ODNR online species distribution lists¹, twenty-nine (29) animal species and 64 plant species designated by the State of Ohio as threatened or endangered are listed as potentially occurring in Summit County. The U.S. Fish and Wildlife Service website² lists the federally endangered Indiana bat (*Myotis sodalis*), the federally threatened Northern long-eared bat (*Myotis septentrionalis*), the federally threatened eastern massasauga (*Sistrurus catenatus*), and the federally threatened Northern monkshood (*Aconitum noveboracense*) as potentially occurring in Summit County. The Project work

¹ <https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-odnr/wildlife/documents-publications/wildlife-plants-county>

² <https://www.fws.gov/midwest/endangered/lists/ohio-cty.html>

limits will be entirely within the maintained area located adjacent to the existing substation. This area consists entirely of gravel or grass that is routinely mowed. One or two trees may be cut as a result of the Project due to potential clearance issues but will be cut prior to March 15, 2021 to avoid any adverse impacts to listed bat species. As such, the Project is not anticipated to adversely impact any listed species.

As part of the investigation, a request for comments was submitted to the United States Fish and Wildlife Services (“USFWS”). The USFWS’s November 23, 2020 response is attached as Exhibit 7.

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

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

No national or state forests or parks, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, or wildlife sanctuaries were identified within the potential disturbance area of the Project.

The Project area is located within maintained mowed lawn and gravel substation yard. No wetlands, streams, or ponds are located within 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 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 Twinsburg Township, Summit County, Ohio.

Summit County

Ms. Ilene Shapiro
Summit County Executive
175 South Main Street, 7th Floor
Akron, OH 44308

Deputy Director,
Summit County
Planning/GIS Division,
175 South Main Street, 7th Floor
Akron, OH 44308

Mr. Jeff Wilhite
President of Council,
Summit County
175 South Main Street, Ste.700
Akron, OH 44308

Mr. Alan Brubaker, P.E., P.S.
Summit County Engineer
538 East South Street
Akron, Ohio, 44311-1843

Ms. Elizabeth Walters
Vice-President of Council,
Summit County
175 South Main Street, Ste.700
Akron, OH 44308
Mr. Dennis Tubbs, GISP,

Ms. Kristen Scalise, CPA, CFE
Fiscal Officer, Summit County
175 S. Main Street 4th Floor
Akron, OH 44308

Twinsburg Township

Mr. James Balogh
Twinsburg Township Trustee
1790 Enterprise Parkway
Twinsburg, OH 44087

Mr. Rob Kagler
Twinsburg Township Manager
1790 Enterprise Parkway
Twinsburg, OH 44087

Mr. Jamey DeFabio
Twinsburg Township Trustee
1790 Enterprise Parkway
Twinsburg, OH 44087

Ms. Tania L. Johnson
Twinsburg Township Fiscal Officer
1790 Enterprise Parkway
Twinsburg, OH 44087

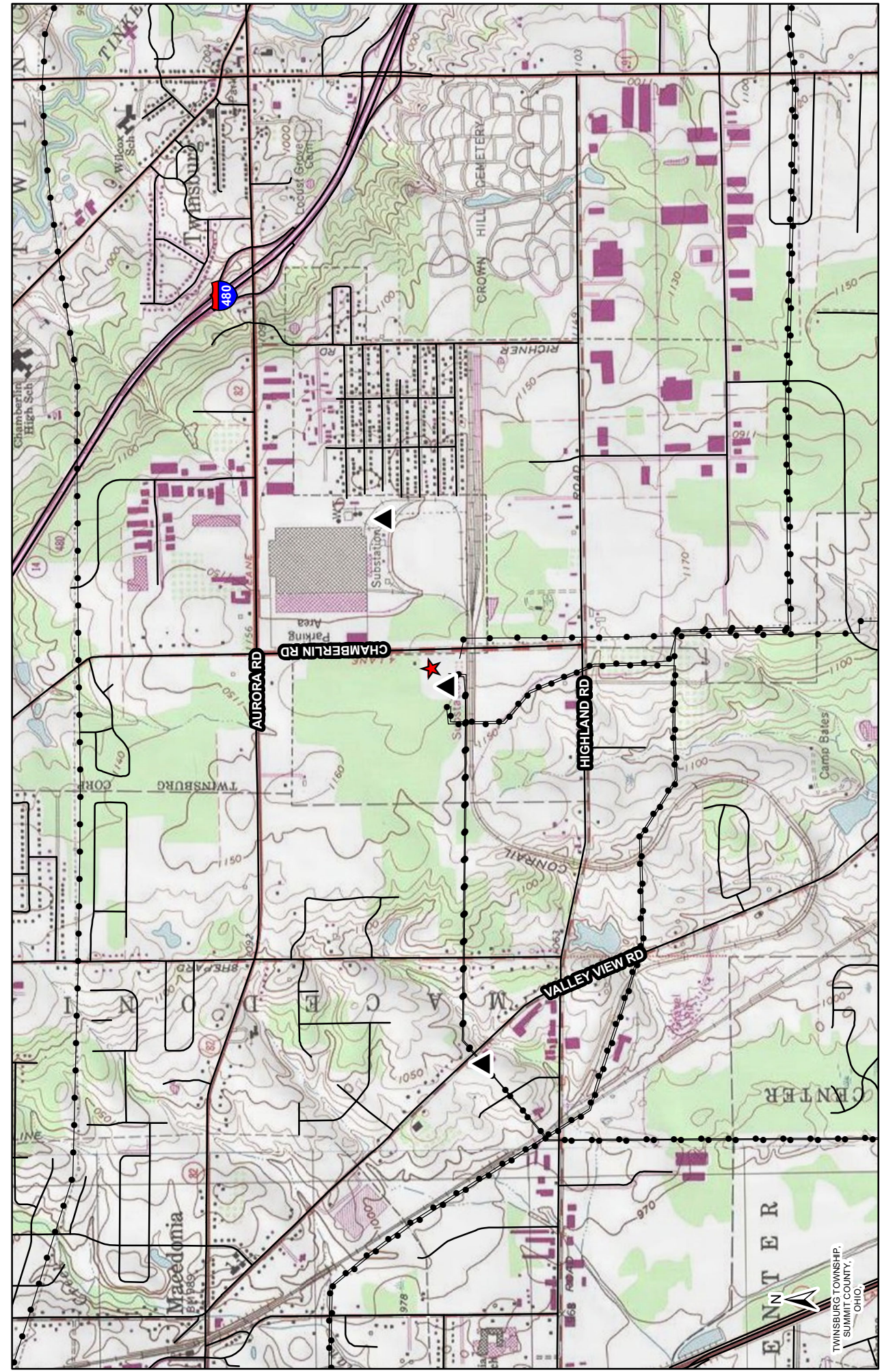
Mr. Thomas Schmidt
Twinsburg Township Trustee
1790 Enterprise Parkway
Twinsburg, OH 44087

Library

Ms. Laura Leonard, Director
Twinsburg Public Library
10050 Ravenna Rd.
Twinsburg, OH 44087

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

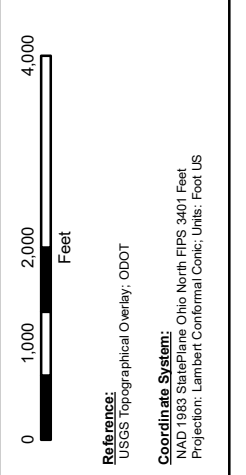
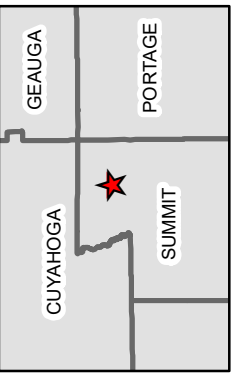
Information is posted at www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Construction Notice application. The link to this website is being provided to meet the requirements of OAC Rule 4906-6-07 (B) and to provide the Board with proof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



FirstEnergy

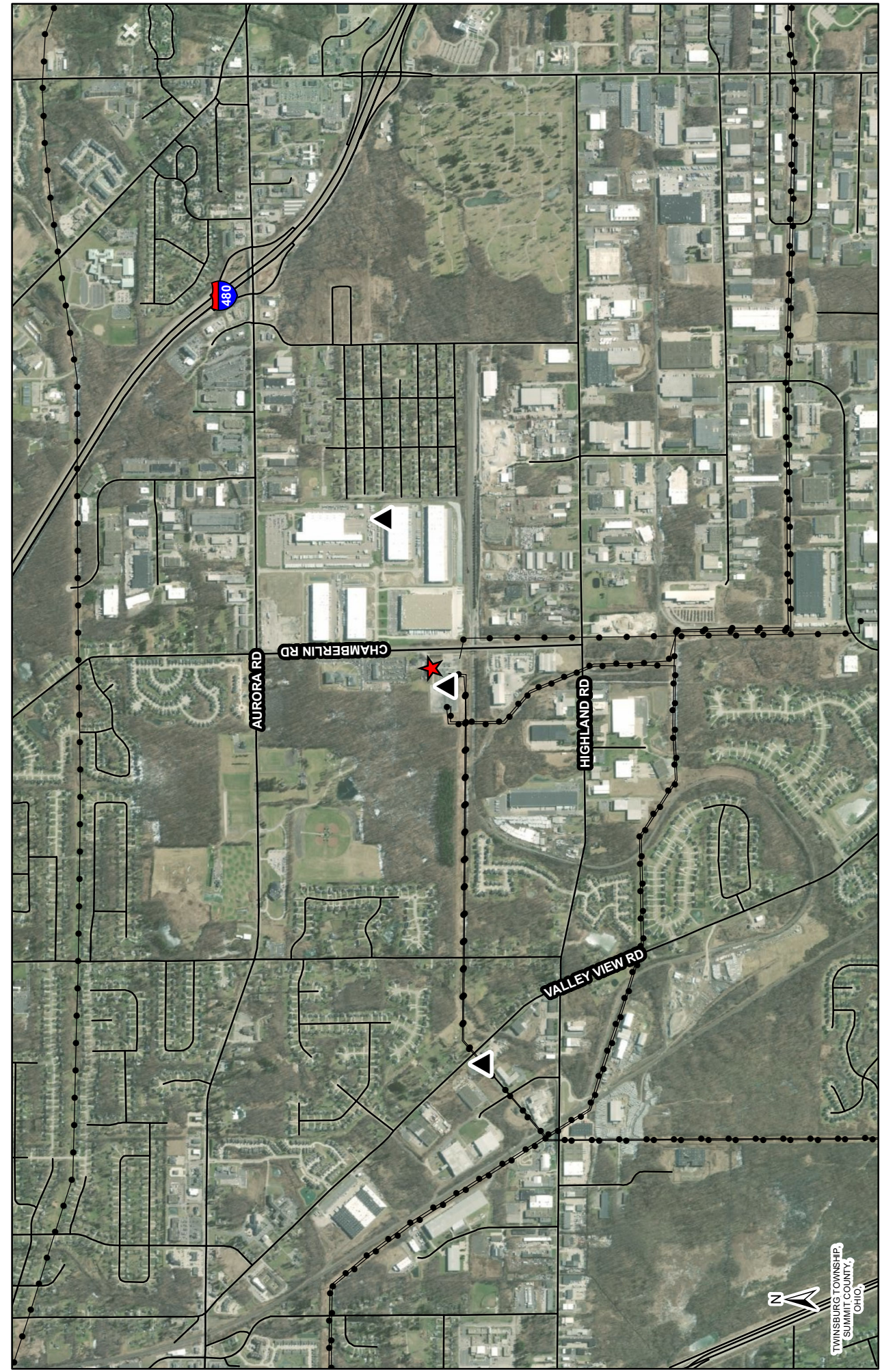
EXHIBIT 1

Chamberlain Substation 138 kV Strain Bus
Structure Addition Project



- LEGEND:**
- ★ Project Location
 - ▲ Substation
 - — 138 kV & 345 kV Transmission Lines
 - Roads

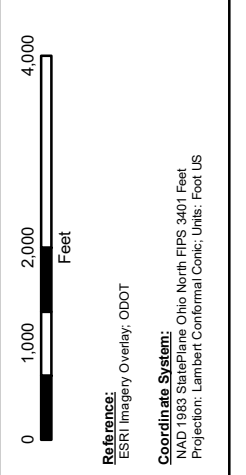
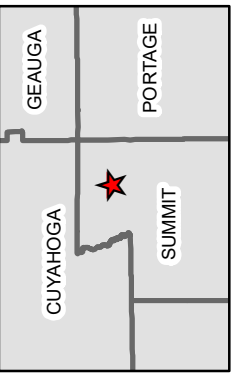
TWINSBURG TOWNSHIP,
SUMMIT COUNTY,
OHIO



TWINSBURG TOWNSHIP,
SUMMIT COUNTY,
OHIO

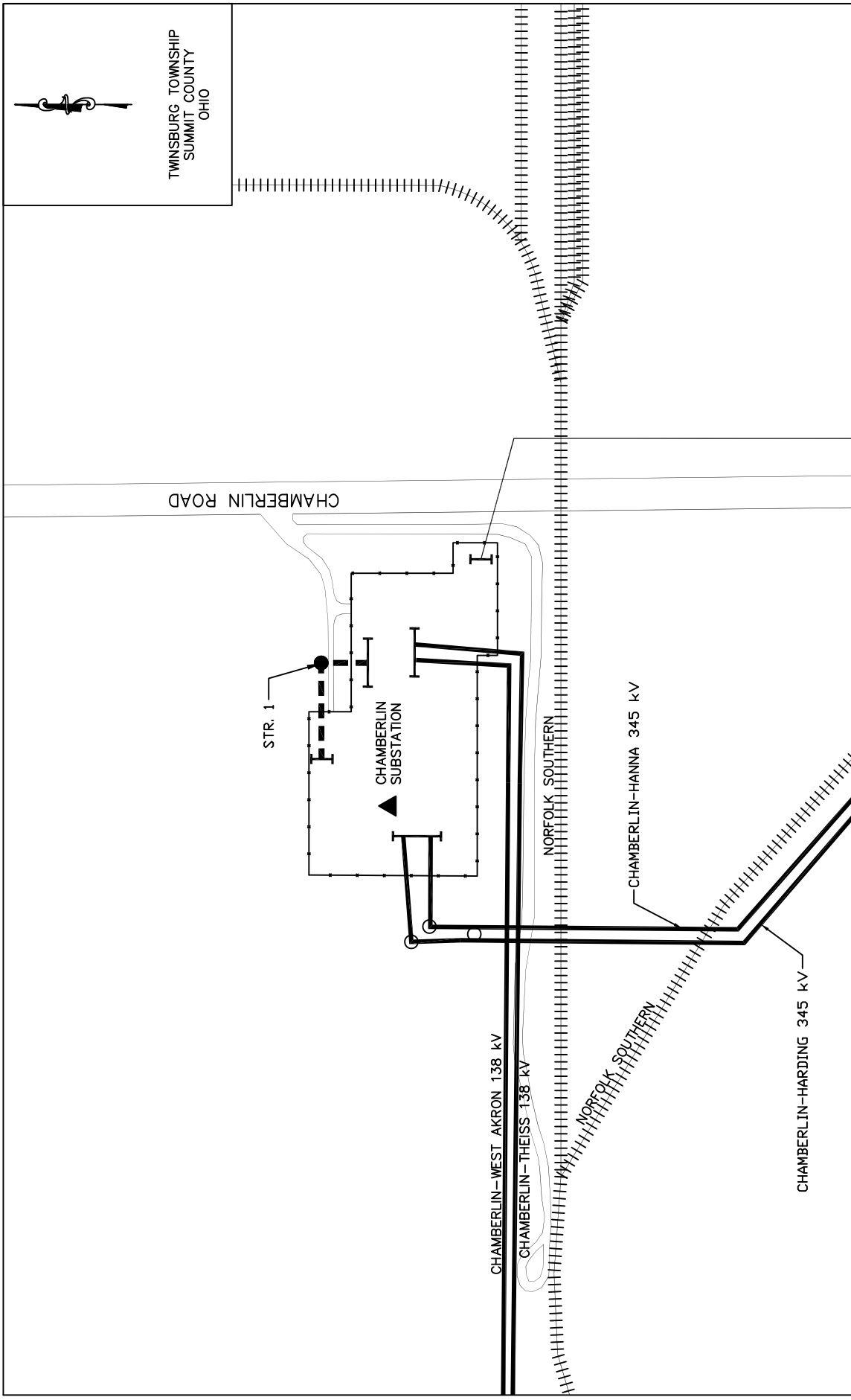
EXHIBIT 2


Chamberlin Substation 138 kV Strain Bus
Structure Addition Project



LEGEND:


- Project Location
- Substation
- 138 kV & 345 kV Transmission Lines
- Roads





TWINSBURG TOWNSHIP
SUMMIT COUNTY
OHIO

CHAMBERLIN SUBSTATION 138 kV
STRAIN BUS STRUCTURE ADDITION
PROJECT



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

GENERAL LAYOUT

LEGEND

- ▲ EXISTING SUBSTATION
- EXISTING SUBSTATION FENCE LINE
- EXISTING STEEL MONOPOLE STRUCTURE
- NEW STEEL MONOPOLE STRUCTURE
- EXISTING CONDUCTOR
- - - NEW CONDUCTOR
- EXISTING ROADS
- ||||| RAILROAD

EXHIBIT 3



Reliability Analysis Update

Transmission Expansion Advisory
Committee
November 3, 2016

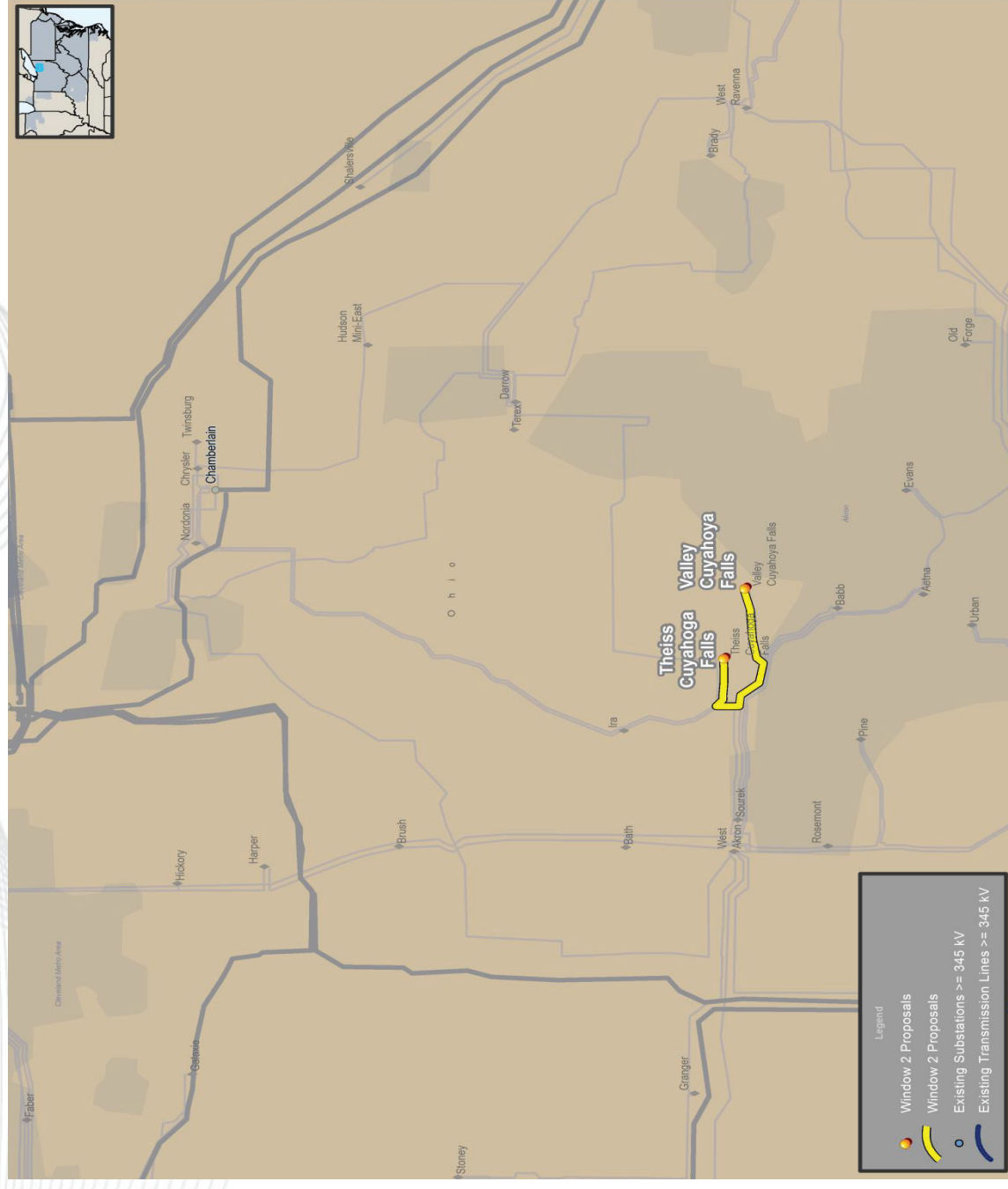


2016 RTEP Proposal Window #2 Updates and Recommendations

- N-1-1 Voltage (FG# N2-VM5, N2-VM6) :
- Low voltage violation at Valley and Theiss Road 138 kV stations for the N-1-1 contingency loss of the Chamberlain 345/138 kV transformer and the Valley – Babb 138 kV circuit .

- **Alternatives considered:**

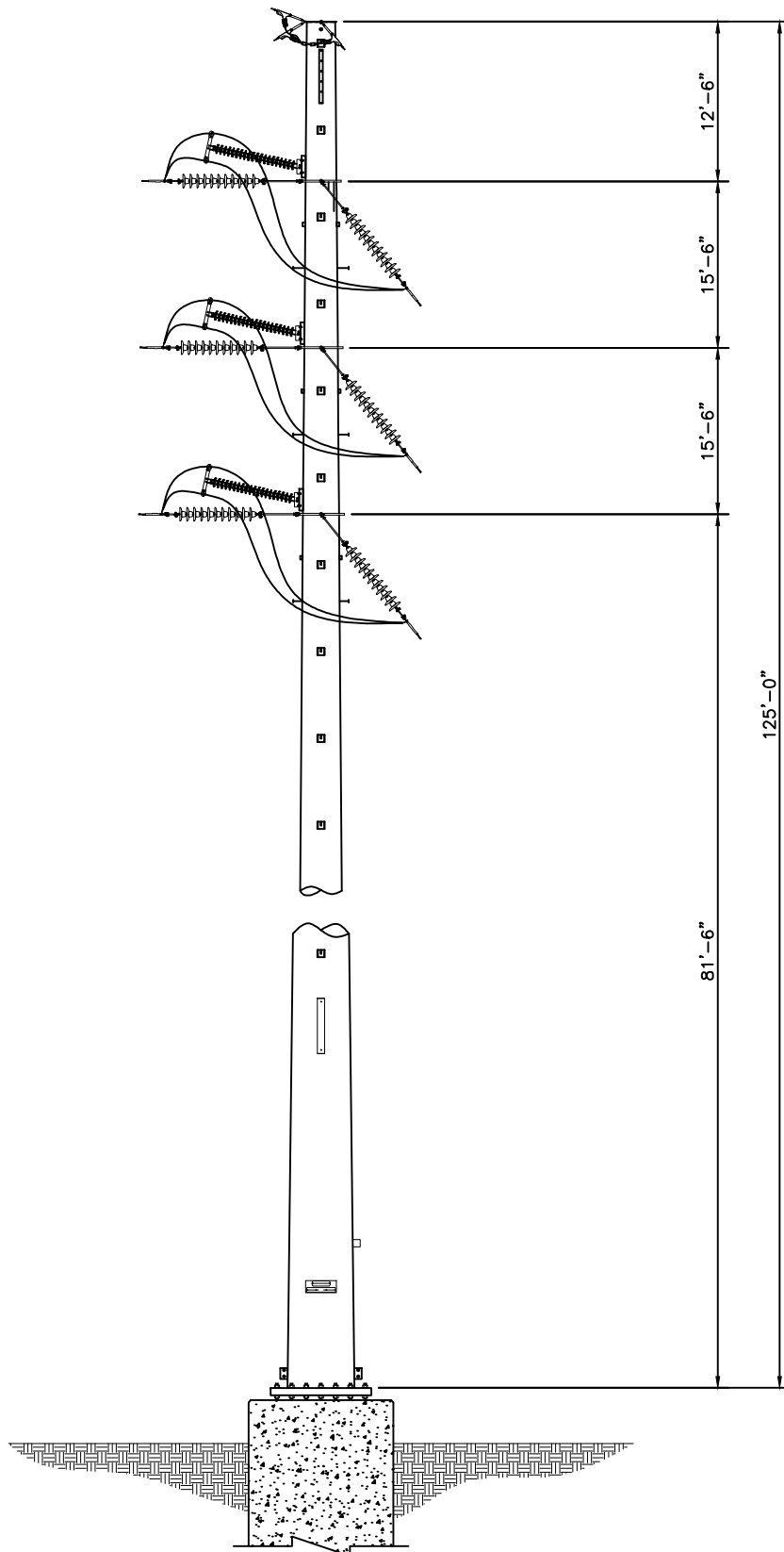
- 2016_2-8B: Install one 138kV 50MVAR Capacitor Bank, one Capacitor switcher, one MOAB's, three CCVT, one Standard Relay panel, tap on Valley-Theiss 138 kV Line, fiber communication and associated relay revisions at Valley & Theiss Substations.
- 2016_2-8C: Add 2nd 345/138kV transformer at Chamberlain substation



- **Comparison of two Options**

	Estimated Cost (M)	Solved the issue?	Equipment availability	New site	Operational Flexibility Benefit	Reliability Improvement for the boarder area
2016_2-8B	\$ 1.8	Y	Purchase new	Yes	No	No
2016_2-8C	\$3.8	Y	A previously purchased system spare transformer already has been placed at the Chamberlin site at the open bay position.	No; Brownfield site; no additional land purchase required	Increased Operational Flexibility including transformer and breaker maintenance.	Yes; Provide additional source for the area

- **Recommended Solution: Add 2nd 345/138kV transformer at Chamberlin substation (2016_2-8C) (B2778)**
- **Estimate Cost: \$3.8M**
- **Required IS Date: 6/1/2021**



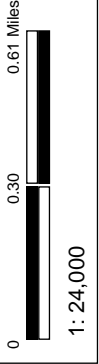
PROPOSED STRUCTURE
STR #1
QTY = 1 REQ'D

**PRELIMINARY - NOT
FOR CONSTRUCTION**

ISSUE DATE: <input type="checkbox"/> CONSTRUCTION <input type="checkbox"/> AS BUILT <input type="checkbox"/> RECORD	DR. TMG/BMcD 10/20	C.E. -	CHAMBERLIN SUBSTATION 138 kV STRAIN BUS STRUCTURE ADDITION PROJECT		
	CHK. TMG/BMcD 10/20	ORDER NO. -			
	INS. JPB/BMcD 10/20	WBS - R/W			
	APP. JPB/BMcD 10/20	SCALE N.T.S.			
		OPERATING CO. ATSI/OE	DWG NO. EXHIBIT 4	SHEET 1	REV.

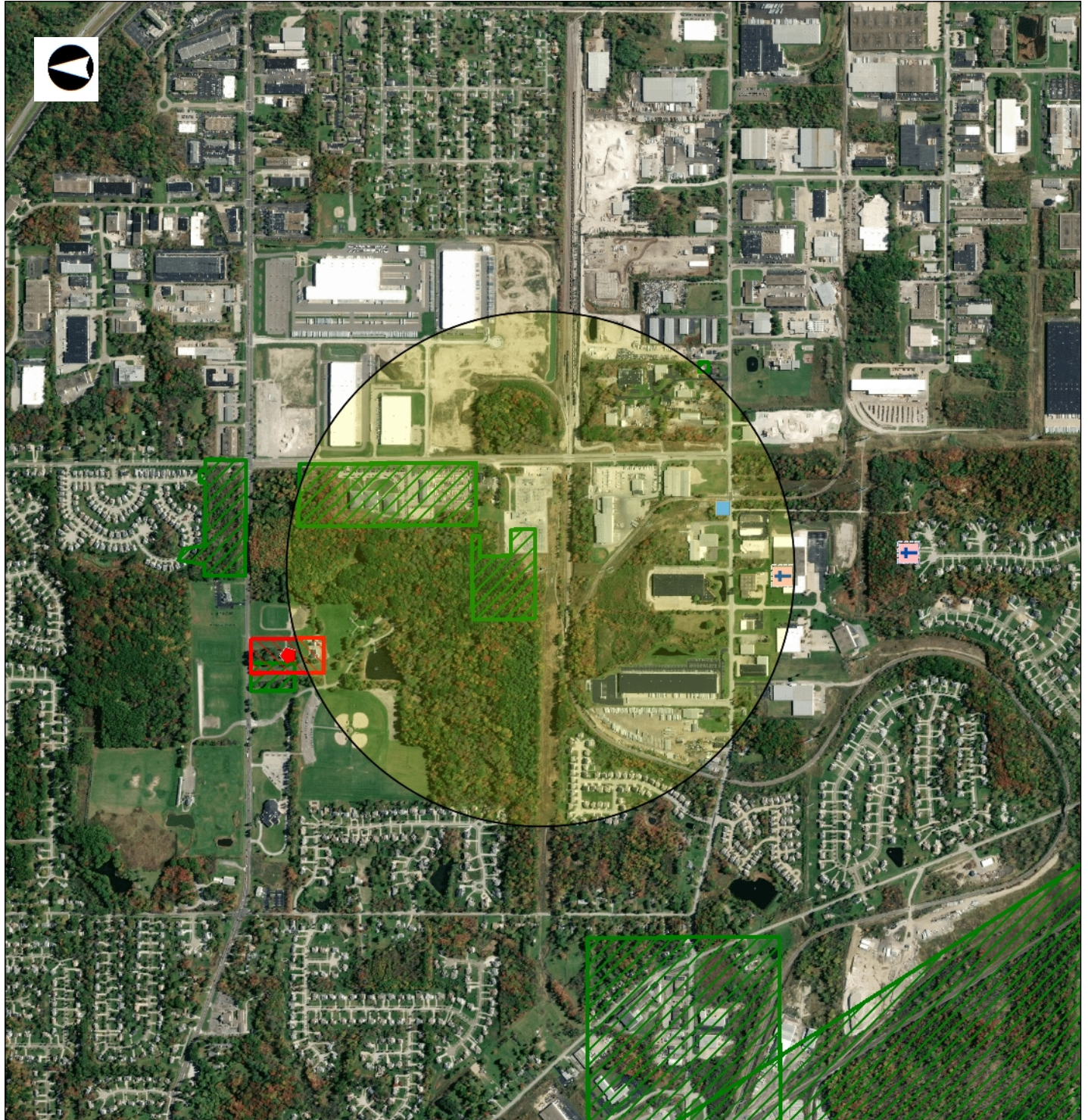
Legend

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



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Datum: [Datum]
 Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere



From: Ohio, FW3 <ohio@fws.gov>
Sent: Monday, November 23, 2020 2:37 PM
To: Philip.Renner@wsp.com
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate; Thomayer, Matthew; Ruggiero, Augustine (Henslee, Dianna L)
Subject: [EXTERNAL] First Energy, Chamberlin Substation 138kV Strain Bus Addition, Twinsburg Twp., Summit County Ohio



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



TAILS# 03E15000-2021-TA-0351

Dear Mr. Renner,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the 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. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed 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 travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) 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

and abandoned mines.

The proposed project is in the vicinity of one or more confirmed records of Indiana bats. Therefore, we recommend that trees ≥ 3 inches dbh be saved wherever possible. Because the project will result in a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to these species. Since Indiana bat presence in the vicinity of the project has been confirmed, clearing of trees ≥ 3 inches dbh during the summer roosting season may result in direct take of individuals. 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 tree removal is unavoidable, we recommend that removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Following this seasonal tree clearing recommendation should ensure that any effects to Indiana bats and northern long-eared bats are insignificant or discountable. **Please note that, because Indiana bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for this species.**

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

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 ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

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

Sincerely,



Patrice M. Ashfield
Ohio Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW