AMERICAN TRANSMISSION SYSTEMS, INCORPORATED A FIRSTENERGY COMPANY

LETTER OF NOTIFICATION

DELTA-WAUSEON 138 kV TRANSMISSION LINE TAP TO WINAMEG AREA SUBSTATION PROEJCT

OPSB CASE NO.: 21-1012-EL-BLN

November 12, 2021

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

LETTER OF NOTIFICATION **DELTA-WAUSEON 138 kV TRANSMISSION LINE**

TAP TO WINAMEG AREA SUBSTATION PROJECT

The following information is being provided in accordance with the requirements of Ohio

Administrative Code (OAC) Chapter 4906-6 for Accelerated Certificate Applications. Per

Appendix A to OAC Rule 4906-1-01, this Project qualifies for submittal to the Ohio Power Siting

Board ("OPSB") as a Letter of Notification application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

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

Name of Project: Delta-Wauseon 138 kV Transmission Line Tap to Winameg

Area Substation ("Project")

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

American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company,

proposes to construct a new 0.84-mile transmission line tap to a new customer substation.

The transmission line tap will extend from the Delta-Wauseon 138 kV Transmission Line

to the customer-owned Winameg Area Substation.

The transmission line tap will begin near MetalX Substation at existing structure 16105—

to be modified into a new switch structure—on the Delta-Wauseon 138 kV Transmission

Line and extend north approximately 300 feet to a new switch structure, 16107. From this

point, the transmission line tap will continue north, overbuilding distribution circuits along

the east side of State Route 109 for approximately 4,100 feet and will be supported on

approximately 19 wood pole tangent structures. The transmission line tap will then cross

to the west side of State Route 109 and continue north for approximately 315 feet towards

County Road H, utilizing 2 wood pole deadend structures before terminating into the

Winameg Area Substation.

American Transmission Systems, Incorporated A FirstEnergy company

The general location of the proposed Project is shown in Exhibit 1 and Exhibit 2. Exhibit 1 is a partial copy of a USGS Topographic Map. Exhibit 2 provides a partial copy of ESRI aerial imagery. The project is located in York Township, Fulton County, Ohio. The general layout is shown in Exhibit 3.

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

The Project meets the requirements for a Letter of Notification because the Project fits within the definition of Item (1)(b) of the Application Requirement Matrix for Electric Power Transmission Lines, in Appendix A of OAC Rule 4906-1-01 which states:

- (1) New construction, extension, or relocation of a single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a high transmission voltage, as follows:
 - (b) Line(s) greater than 0.2 miles in length but not greater than two miles in length.

This Project meets requirement (1)(b) because the proposed transmission line tap from the existing Delta-Wauseon 138kV Transmission Line to the Winameg Area Substation is approximately 0.84 mile in length.

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

The Project is needed to connect and serve a new customer on the ATSI Transmission system. The customer, Tricounty Rural Electric Cooperative ("TCREC") requested service from ATSI. In order to fulfill the request for service, ATSI will build a new tap connection from the existing Delta-Wauseon 138 kV Transmission Line to TCREC's Winameg Area Substation.

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

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp 2021 Long-Term Forecast Report ("LTFR"). This map was submitted to the PUCO in Case No. 21-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. This map shows ATSI's 345 kV and 138 kV transmission lines, including the Delta-Wauseon 138kV Transmission Line, and transmission substations. The general location of the Project area is shown in Exhibits 1 and 2. The Project layout is shown in Exhibit 3. The Project is not included in ATSI's LTFR filed in 2021 because the agreement was finalized in March 2021, after the 2021 LTFR had already been released.

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

No alternatives were considered for this project because no other existing transmission lines are located in close proximity to TCREC's Winameg Area Substation. Therefore, the Delta-Wauseon 138 kV Transmission Line offers the most direct and economical, as well as the least environmentally impactful, solution for a transmission connection to Winameg Area Substation.

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 Letter of Notification, along with other Project information, on its project website.

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

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

Finally, during all phases of this Project, ATSI may be contacted with questions/comments about this Project through ATSI's transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com. ATSI remains committed to working with property owners and area residents concerning the proposed Project.

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

Construction for the Project is anticipated to begin on January 4, 2022. The proposed inservice date for the Project is February 15, 2022.

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

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

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

The Project will require new right-of-way. As of the date of this Application, ATSI has not yet obtained easements, options, and/or land use agreements necessary to construct and operate the facility. Table 1 contains a list of properties for which ATSI needs to obtain such agreements.

Table 1: Properties List

Parcel Number	Easement Status	
29-056056-01.000	Negotiations Ongoing	
29-056056-00.000	Negotiations Ongoing	
31-056064-00.000	Negotiations Ongoing	

29-056108-04.000	Negotiations Ongoing
29-056108-02.002	Negotiations Ongoing
29-056108-02.001	Negotiations Ongoing
29-056108-02.000	Negotiations Ongoing
29-056000-00.000	Negotiations Ongoing
29-056000-02.000	Negotiations Ongoing

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

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

The equipment and facilities described below are associated with the Project.

Voltage: 138 kV

Conductors: 954 kcmil 45/7 ACSR

Static Wire: 7#8 Alumoweld

Insulators: Deadend (Porcelain); Tangent (Polymer)

ROW Width: 60 feet

Land Requirements: New ROW required

Structure Types: Twenty-two (22) new structures will be installed:

Exhibit 4 - Nineteen (19) Wood Pole Tangent Structures

Exhibit 5 – Two (2) Wood Pole Dead-End Structures

Exhibit 6 – One (1) Wood Pole Switch Structure

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

Because the closest occupied residence is approximately 40 feet from the proposed transmission line centerline, Electric and Magnetic Field ("EMF") calculations are required for this Project.

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

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

Table 2: Transmission Line Loading

Line Name	Normal	Emergency	Winter Rating
	Loading Amps	Loading Amps	Amps
Delta-Wauseon 138kV Transmission Line Tap to Winameg Area Substation	85.5	1758	2152

Table 3 provides an approximation of the magnetic and electric fields strengths of the Delta-Wauseon 138kV Transmission Line Tap to Winameg Area Substation calculated in a 60-foot right-of-way. The calculations provide an approximation of the electric and magnetic field levels based on specific assumptions utilizing the EPRI EMF Workstation 2015 program software. This program software assumes the input transmission line configuration is located on flat terrain. Also, a balanced, three-phase circuit loading is assumed for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission line.

Table 3: EMF Calculations for Delta-Wauseon 138kV Transmission Line Tap to Winameg Area Substation

Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation– 60ft ROW		Electric Field kV/m	Magnetic Field mG
Normal	Under Lowest Conductors	0.655	4.16
Loading	At Right-of-Way Edges	0.294 / 0.38	2.54 / 2.79
Emergency	Under Lowest Conductors	0.655	85.47
Loading	At Right-of-Way Edges	0.294 / 0.38	52.24 / 56.9
Winter	Under Lowest Conductors	0.655	104.63
Rating	At Right-of-Way Edges	0.294 / 0.38	63.95 / 70.15

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

The strength of EMFs can potentially be reduced by installing the transmission line conductors in a compact configuration and by selecting conductor phasing that reduces the field strengths. ATSI designs its facilities according to the requirements of the NESC. The pole heights and configuration were chosen based on NESC specifications, engineering parameters, and cost. ATSI's typical practice, as proposed in this Project, is to install 138 kV transmission lines primarily on wood tangent structures supported on horizontal post insulators, as this is a compact design that reduces EMF field strengths in comparison to other installations.

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

The estimated capital cost for Project is approximately \$2,600,000.

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

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

The Project is located in York Township, Fulton County, Ohio. Based on the US Bureau of Census estimates, the 2010 population of York Township was 4,041. The 2020 population estimate of Fulton County was 42,713. The Project area is in

agricultural/industrial zoned land. No significant changes or impacts to the current land use are anticipated.

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

One agricultural property, but no agricultural district, exists within the Project's disturbance area and is shown in Table 4. This parcel is 34.297-acres, consists of active farmland and silos. The Project route was chosen along the north edge of the equipment buildings & silos on the property to minimize impacts to the farmable land.

Table 4: Agricultural Lands within the Project's Disturbance Area

Parcel Number	Agricultural District	
29-056000-00.000	No	

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

As part of the investigation, a search of Ohio Historic Preservation Office ("OHPO") online database was conducted to identify the existence of any significant archeological or cultural resource sites within a 0.5 mile Area of Potential Effect ("APE"). The results of the search are shown in Exhibit 7. The specific location of any archeological resources are excluded from the map and are instead listed in Table 5.

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 the APE.

The OHPO database also includes listing of the Ohio Archaeological Inventory ("OAI"), the Ohio Historic Inventory ("OHI"), previous cultural resource surveys, and the Ohio Genealogical Society ("OGS") cemetery inventory. Nine (9) OAI listed archeological

resource have been previously inventoried within the APE and are shown in Table 5. Four (4) listed structural resource are located within the APE and are shown in Table 6. Eight (8) previous cultural resource surveys were conducted within the APE and is provided in Table 7.

Table 5. List of OAI Listed Archeological Resources and Sites

OAI Number	Affiliation	Description	County	Quad Name
FU0239	Prehistoric	Unknown	Fulton	Delta
FU0156	Prehistoric	Unknown	Fulton	Delta
FU0154	Prehistoric	Unknown	Fulton	Delta
FU0240	Prehistoric	Unknown	Fulton	Delta
FU0237	Prehistoric	Unknown	Fulton	Delta
FU0226	Prehistoric	Unknown	Fulton	Delta
FU0155	Prehistoric	Unknown	Fulton	Delta
FU0238	Prehistoric	Unknown	Fulton	Delta
FU0180	Prehistoric	Unknown	Fulton	Delta

Table 6. List of OHI Listed Structural Resources

OHI Number	Present Name	Historic Use	County	Municipality
FUL0045911	Woodring Property	Single Dwelling	Fulton	York Township
FUL0046011	House	Single Dwelling	Fulton	Delta
FUL0044911	Nature Fresh Farms	Single Dwelling	Fulton	Delta
FUL0045711	House, 8900 US 20A	Single Dwelling	Fulton	York Township

Table 7. List of Previous Cultural & Historic Resource Survey

Year	Name	County	Municipality
2016	Phase I Archaeological Investigation American Transmission Systems, Inc. & Toledo Edison Company (FirstEnergy Companies) Delta- Wauseon 138 kV Transmission Line Tap to Nature Fresh Farms Project, Fulton County, Ohio	Fulton	York Township
2017	Phase I Cultural Resource Management Survey of the Proposed 20.5ha (50.72a.) MetalX Scrap Processing Facility in York Township, Fulton County, Ohio	Fulton	York Township
2001	Phase I Cultural Resources Reconnaissance Survey for the Proposed Fulton County Processing Facility, York Township Section 11, Fulton County, Ohio	Fulton	York Township
1996	North Star Steel 345 Kv Transmission Line Project Archeological Investigation, Fulton County, Ohio	Fulton	York Township
2013	Phase I Archaeological Survey of a Proposed 7.08ha (17.5a) Fulton County Processing, Ltd. Expansion in York Township, Fulton County, Ohio	Fulton	York Township
2017	Phase I Cultural Resource Management Survey of a Proposed 12.4ha (30.7a.) ALPO Development in York Township, Fulton County, Ohio	Fulton	York Township
2016	Phase I Cultural Resource Management Survey of the Proposed 64.7ha (160a.) Nature Fresh Farm Development, York Township, Fulton County, Ohio	Fulton	York Township
2006	Phase I Archaeology Survey for the Proposed Delta Steel Products Development in Section 11, York Township, Fulton County, Ohio	Fulton	York Township

Based upon the results of the OHPO online database, there are neither historical nor cultural resources within the Project's right-of-way; therefore, no impacts to any historical or cultural resources are anticipated as a result of this Project.

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

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

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

As part of the investigation, ATSI hired TRC to conduct the necessary environmental surveys, as well as to prepare applications for the required environmental permits. TRC submitted a request to the Ohio Department of Natural Resources ("ODNR") Office of Real Estate to conduct an Environmental Review on September 7, 2021. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife's Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. The ODNR's Office of Real Estate's response, dated September 17, 2021, indicates that eleven state and/or federally-listed endangered species are located within a one-mile radius of the Project Area. A copy of ODNR's Office of Real Estate's response is included as Exhibit 8.

As part of the investigation, TRC also submitted a request to the U.S. Fish and Wildlife Service ("USFWS") for an Ecological Review, to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. A copy of USFWS's Ecological Review response, dated September 20, 2021, is included as Exhibit 9. A list of all endangered, threatened, and rare species, as identified by ODNR and USFWS, within the range of the Project is provided in Table 8 on the next page.

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

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Indiana bat	Myotis sodalis	Endangered	Endangered	Trees & Forest
Northern long-eared bat	Myotis septentrionalis	Threatened	Endangered	Trees & Forest
Little brown bat	Myotis lucifugus	N/A	Endangered	Trees & Forest
Tricolored bat	Perimyotis subflavus	N/A	Endangered	Trees & Forest
Rayed bean	Villosa fabalis	Endangered	Endangered	Streams/Rivers
Greater redhorse	Moxostoma valenciennesi	N/A	Threatened	Streams/Rivers
Kirtland's snake	Clonophis kirtlandii	N/A	Threatened	Wetlands / Wet Meadows
Blanding's turtle	Emydoidea blandingii	N/A	Threatened	Marshes, Ponds, Lakes & Streams
Lark sparrow	Chondestes grammacus	N/A	Endangered	Grasslands
Northern harrier	Circus hudsonis	N/A	Endangered	Marshes & Grasslands
Trumpeter swan	Cygnus buccinator	N/A	Threatened	Wetlands

The responses from ODNR and USFWS indicate that the Project area is within the range of the federal and state endangered Indiana Bat, the federal threatened and state endangered Northern Long-Eared Bat, the state endangered Little Brown Bat, and the state endangered Tricolored Bat. Field and desktop assessments yielded no evidence of hibernacula suited for these bat species within the project area, and ODNR concurs with this assessment. No tree clearing will be associated with the proposed Project. Therefore,

no impacts to these species are anticipated. (See attached Exhibits 11 (Desktop Hibernacula Assessment) and 12 (ODNR concurrence letter as Exhibit 12).)

The response from ODNR indicates that the Project area is within the range of the Rayed Bean and Greater redhorse. No impacts to these species are expected because no work is proposed in streams. The ODNR also found that the Natural Heritage Database has records of Kirtland's Snake and Blanding's Turtle at or within a one-mile radius of the Project area (both state threatened species). Habitat for Kirtland's Snake and Blanding's Turtle include wetlands, wet meadows, lakes and streams. No in-water work or wetland work is proposed as part of this Project, so impacts to these species are not expected. The ODNR also determined that the Project area is within range of the state-endangered Lark sparrow, Northern harrier, and the state-threatened Trumpeter swan. These species can typically be found in grasslands, marshes, and wetlands. It is unlikely that this species are present within the Project area due to the existing site characteristics consisting of mower-maintained roadside grass areas and agricultural land.

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

The ODNR Office of Real Estate researched the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the project area. The ODNR's Office of Real Estate's response on September 17th, 2021 indicated that they have no records of the aforementioned areas within one (1) mile of the identified Project area. The USFWS's response on September 20, 2021 indicated that there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area.

TRC conducted a wetland and stream assessment of the Project area on September 10, 2021. The Project Study Area for this assessment was approximately 10.35-acres in size. The Project Study Area included the corridor for the Delta-Wauseon 138kV Transmission Line Tap with a 50-foot buffer. Land use surrounding the Project Study Area was observed

to be agricultural, residential, commercial, and industrial. One (1) perennial stream (S-MRR-1) was identified within the Project Study Area during the field survey. No wetlands or other streams were identified within the Project Study Area. See Exhibit 10 for further details and descriptions of delineated features located within the Project Study Area. Due to location of the transmission structures associated with this Project, construction matting will be used as temporary access, as needed, to perform the necessary work. The perennial stream located within the Project Area will be avoided during construction.

The Project work limits do not encroach on any regulated flood plains based on a review of online FEMA Flood Insurance Rate Mapping. Exhibit 10 depicts the location of the regulated flood plains in relation to the Project Area (no floodplains shown in map extent).

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

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

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

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

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

This Letter of Notification application is being provided concurrently to the following public officials from York Township and Fulton County.

Fulton County

Mr. Joe Short Fulton County Commissioner 152 S. Fulton Street Wauseon, OH 43567

Mr. Jeff Rupp Fulton County Commissioner 152 S. Fulton Street Wauseon, OH 43567

Mr. John Rupp Fulton County Commissioner 152 S. Fulton Street Wauseon, OH 43567 Mr. Frank T. Onweller Fulton County Engineer 9120 Co. Road 14 Wauseon, OH 43567-9669

Ms. Alexis Luttrell, Planner Fulton County Regional Planning Commission 152 S. Futon Street, Suite 100 Wauseon, OH 43567

Ms. Jackie Savage, District Admin. Fulton County Soil & Water Conservation District 8770 State Route 108, Suite B Wauseon, OH 43567

York Township

Mr. Mark Jones York Township Trustee P.O. Box 248 Delta, OH 43515

Mr. Robert W. Trowbridge York Township Trustee P.O. Box 248 Delta, OH 43515 Mr. Jeffrey Mazurowsi York Township Trustee P.O. Box 248 Delta, OH 43515

Ms. Karen S. Miller York Township Fiscal Officer 7614 Co Rd E. Delta, OH 43515

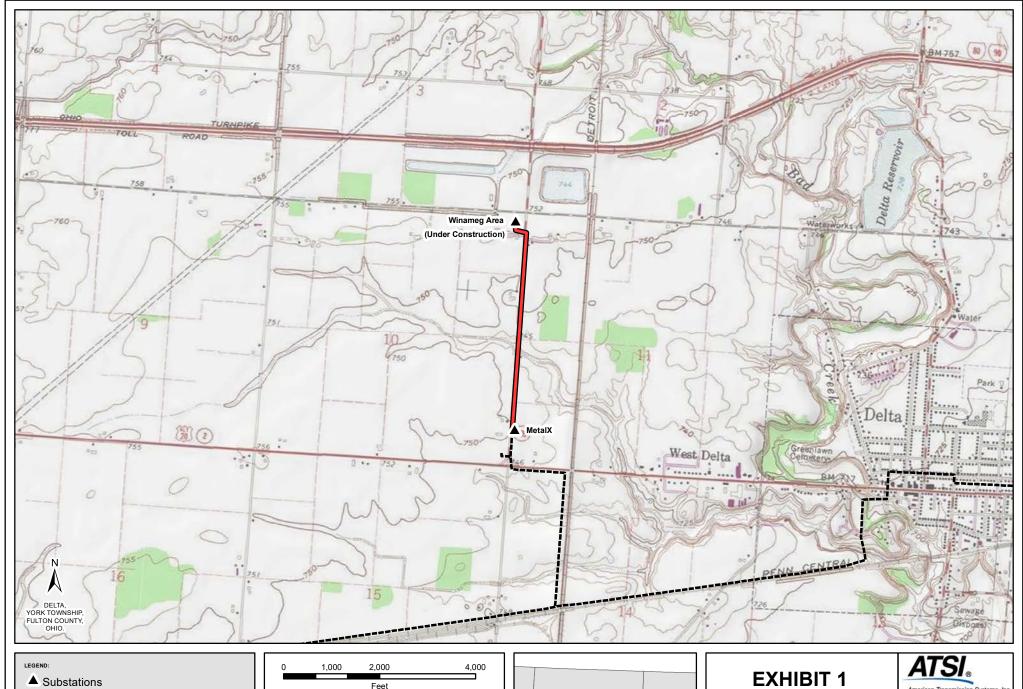
Libraries

Ms. Candy Baird, Director Delta Public Library 402 Main Street Delta, OH 43515

Copies of the transmittal letters to these officials have been included with the package submitting this Letter of Notification application to the Ohio Power Siting Board and are being provided to meet the requirement of OAC Rule 4906-6-07 (B) to submit proof of

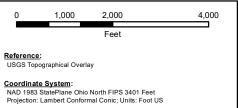
compliance with the notice requirement to local officials found in OAC Rule 4906-6-07 (A)(1).

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



= 138 kV Tap to Winameg Area Substation

-- Delta-Wauseon 138kV





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

Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation





▲ Substations

= 138 kV Tap to Winameg Area Substation

- -- Delta-Wauseon 138kV
- -Roads

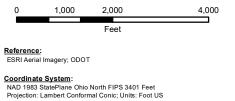
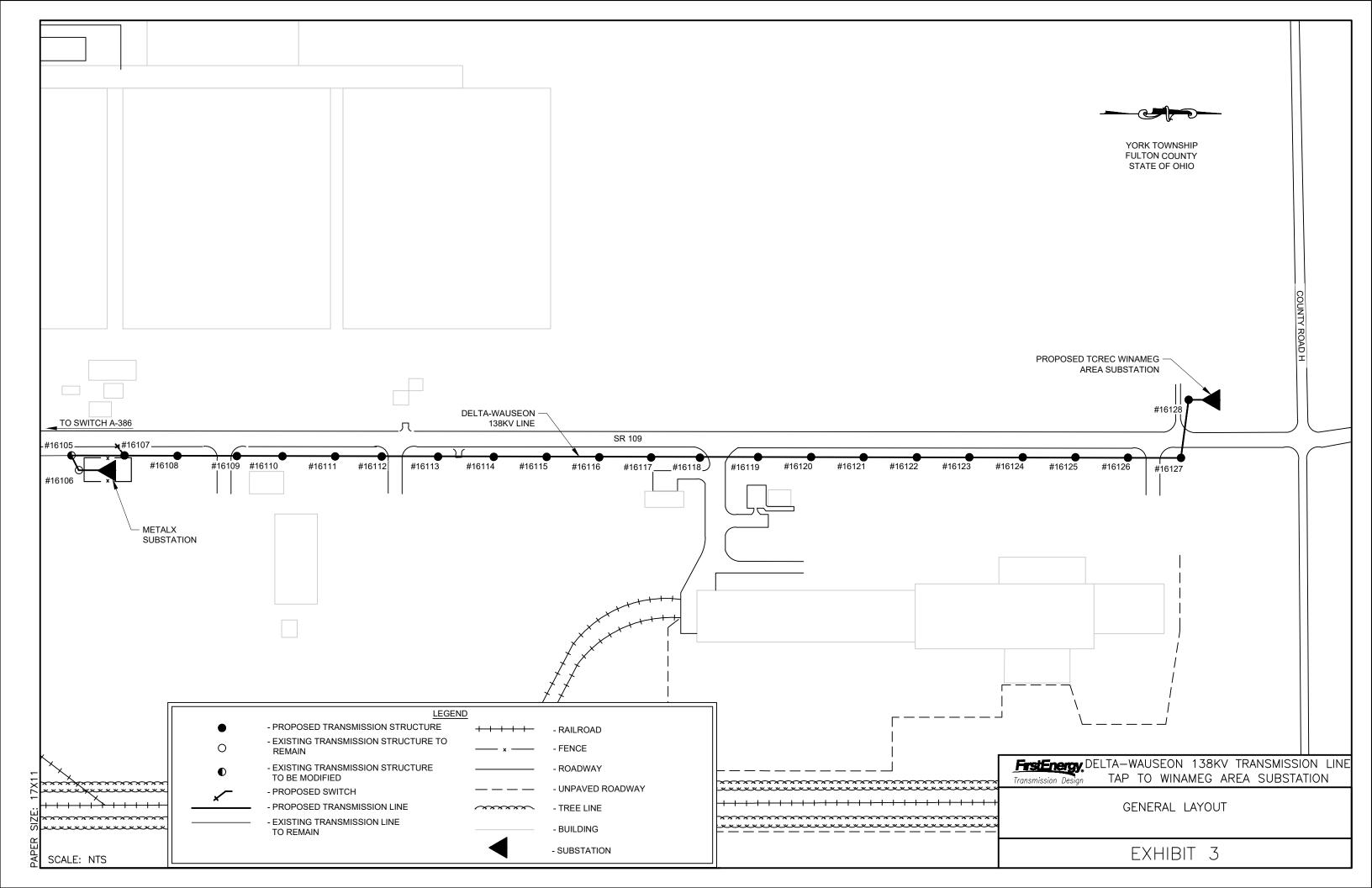


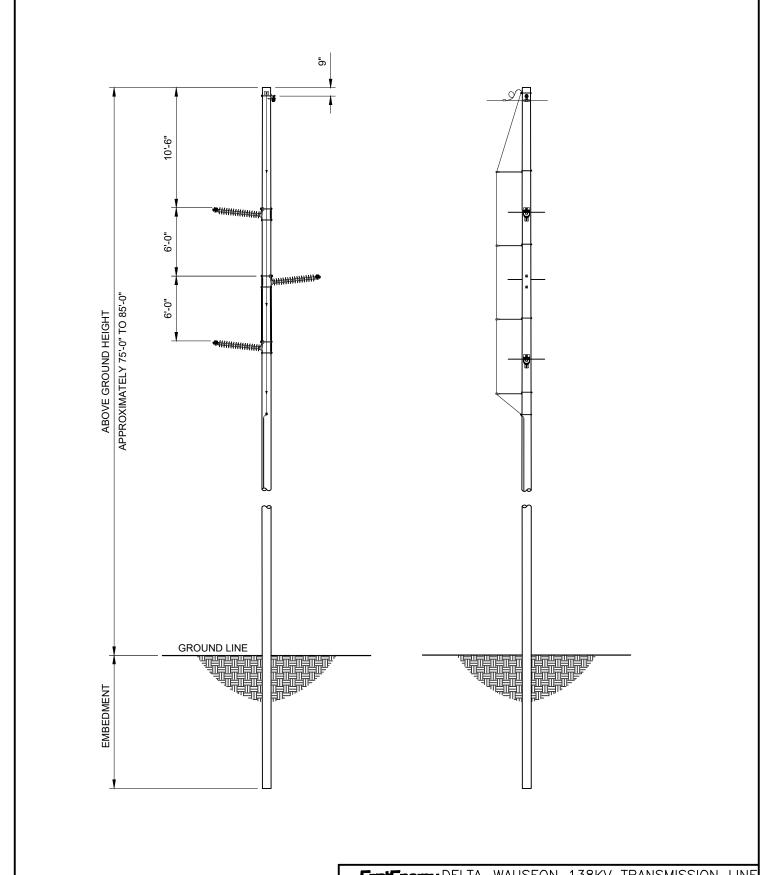


EXHIBIT 2



Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation

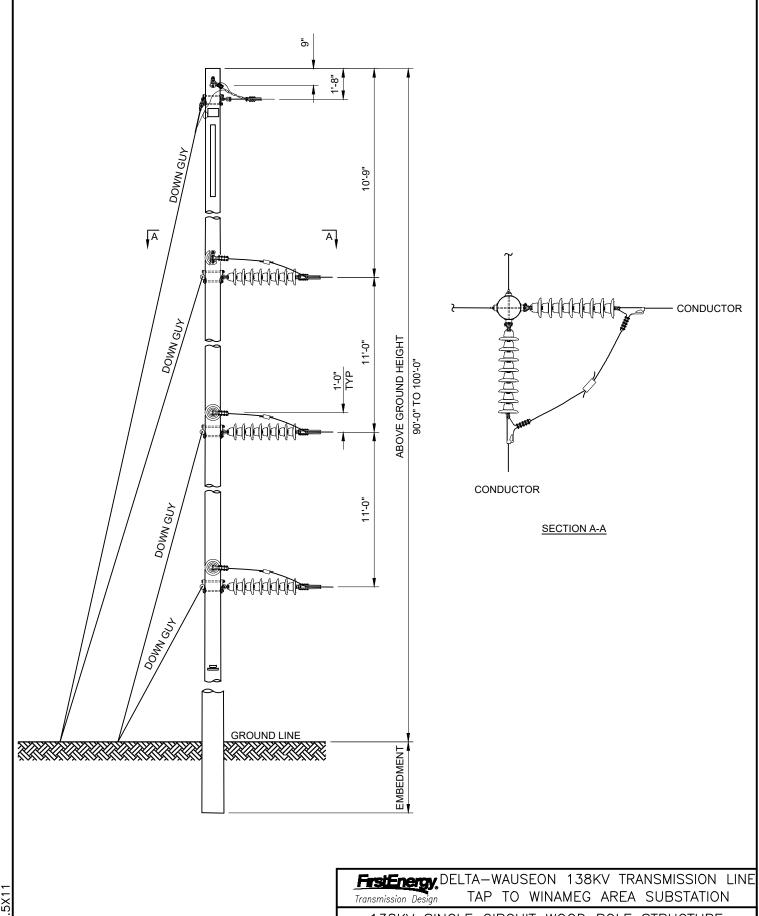




FISHEREY DELTA-WAUSEON 138KV TRANSMISSION LINE
Transmission Design TAP TO WINAMEG AREA SUBSTATION

138KV SINGLE CIRCUIT WOOD POLE STRUCTURE HORIZONTAL POST DELTA SINGLE POLE ANGLES 0° TO 2° STRUCTURES #16108 TO #16126

EXHIBIT 4

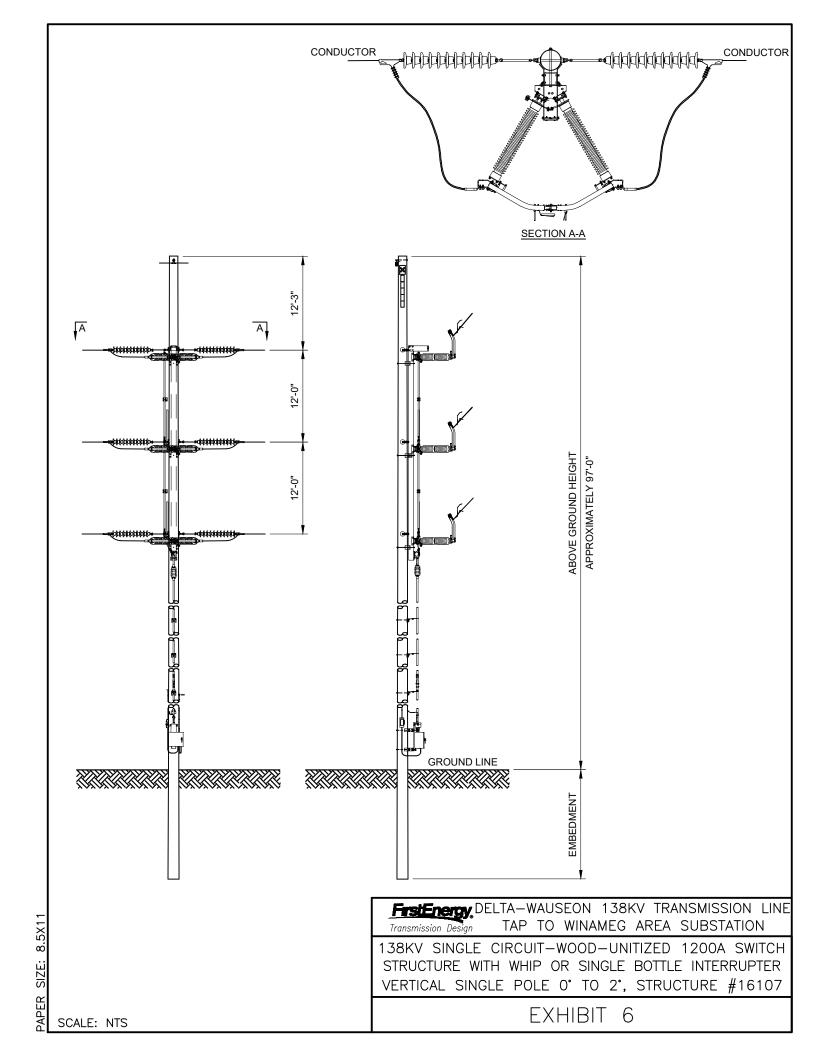


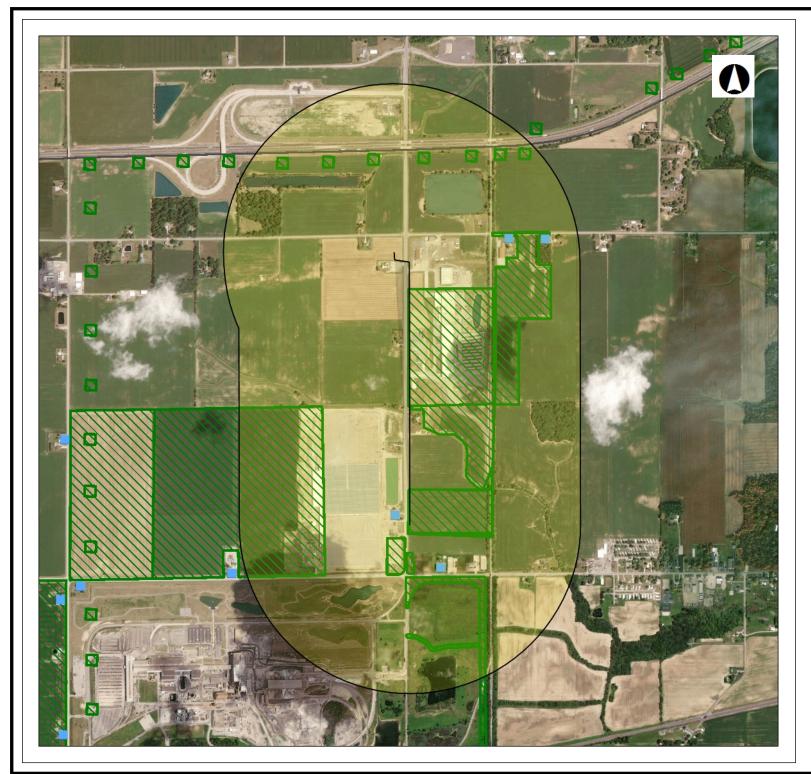
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SCALE: NTS

138KV SINGLE CIRCUIT WOOD POLE STRUCTURE
DEADEND VERTICAL SINGLE POLE ANGLES 60° TO 120°
STRUCTURES #16127 & #16128

EXHIBIT 5







Legend

NR Listings

Listed

National Historic Landmark



Delisted

Determinations of Eligibility

- Demolished
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- Local Designations **OGS** Cemeteries

Confident



Historic Markers

- Dams
- **UTM Zone Split**

NR Boundaries

0.30

0.61 Miles

1: 24,000

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Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

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

September 17, 2021

Maggie Molnar TRC Companies 781 Science Boulevard, Suite 200 Gahanna, Ohio 43230

Re: 21-0828; Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Project: The project proposes to construct a transmission line tap from the Delta-Wauseon 138kV transmission line to the Winameg area substation.

Location: The proposed project is located in the City of Delta, York Township, Fulton County, Ohio.

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

Natural Heritage Database: The Natural Heritage Database has no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

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

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

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

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

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

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact this species.

The project is within the range of the greater redhorse (*Moxostoma valenciennesi*), a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact this or other aquatic species.

The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet meadows and other wetlands. 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 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 lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

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

The project is within the range of the trumpeter swan (*Cygnus buccinator*), a state threatened bird. Trumpeter swans prefer large marshes and lakes ranging in size from 40 to 150 acres. They like shallow wetlands one to three feet deep with a diverse mix of plenty of emergent and submergent vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through June 15. If this habitat will not be impacted, this project is not likely to have an impact on this species.

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

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

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

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

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

Mike Pettegrew Environmental Services Administrator (Acting)



FW: [EXTERNAL] Delta-Wauseon 138 kV Trans line to Winameg Area Substation Project, Fulton Co.

Ruggiero, Augustine <aruggiero@firstenergycorp.com>

Mon 9/20/2021 12:50 PM

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

USFWS response



Auggie Ruggiero

Transmission Permitting

office: 330-315-6781 (8506781) | cell: 330-803-4304

aruggiero@firstenergycorp.com

341 White Pond Drive, Akron, OH 44320 | mailstop: AK-West Akron Campus

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

Sent: Monday, September 20, 2021 12:47 PM

To: Ruggiero, Augus. ne <aruggiero@firstenergycorp.com> **Cc:** Molnar, Maggie <MMolnar@trccompanies.com>

Subject: FW: [EXTERNAL] Delta-Wauseon 138 kV Trans line to Winameg Area Substa on Project, Fulton Co.

Auggie, for your records.

Regards,

Brad M. Falkinburg, PWS

Planning Permitting and Licensing
Office Practice Leader – Ecological Services



1382 West Ninth Street, Suite 400, Cleveland, OH 44113 **D** 216.352.6216 | **O** 216.344.3072 | **C** 440.666.2890

<u>LinkedIn | Twitter | Blog | TRCcompanies.com</u>

Please note that our domain name and email addresses have changed

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

Sent: Monday, September 20, 2021 11:07 AM

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

Cc: Falkinburg, Brad < <u>BFalkinburg@trccompanies.com</u>>; Ray, Ma hew < <u>MRay@trccompanies.com</u>> **Subject:** [EXTERNAL] Delta-Wauseon 138 kV Trans line to Winameg Area Substa on Project, Fulton Co.

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



TAILS# 03E15000-2021-TA-2310

Dear Ms. Molnar,

The U.S. Fish and Wildlife Service (Service) received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse effects to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

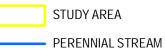
Federally Threatened and Endangered Species: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or 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, then 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.

Sincerely,

Patrice M. Ashfield Field Office Supervisor

Exhibit 10

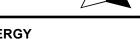


CULVERT

UPLAND DATA POINT



1,000 Feet 1 " = 500 ' 1:6,000



FIRSTENERGY DELTA-WAUSEON LINE TAP TO SS 16933922

FIGURE 3 DELINEATED RESOURCES MAP



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

Fig03_DelinResources.mxd



Exhibit 11

October 21, 2021

Ohio Department of Natural Resources Office of Real Estate & Land Management 2045 Morse Road, Building E-2 Columbus, OH 43229-6693

Re: Desktop Assessment for potential hibernaculum for the Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project located in the City of Delta, York Township, Fulton County, Ohio. (TRC Project No. 429847.0015)

To Whom It May Concern,

In response to the Ohio Department of Natural Resources (ODNR), Division of Wildlife's (DOW) recommendations, TRC Companies, Inc. (TRC) completed a desktop habitat assessment, on behalf the Toledo Edison, a FirstEnergy Company, to determine if potential hibernaculum is present within the proposed Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project (Project) Study Area. The proposed Project is located in the City of Delta and York Township, Fulton County, Ohio (**Appendix A, Figure 1** and **Figure 2**). The land within the Project Study Area consists of existing maintained utility right-of-way located in industrial, commercial, and residential areas, totaling 10.35 acres (**Appendix A, Figure 3**).

During the recommended desktop habitat assessment, secondary source information was utilized to determine if past or present underground resources were present within 0.25-mile of the Project Study Area. The secondary source information utilized included but was not limited to: aerial imagery mapping (GoogleEarth, 2021), karst topography mapping (ODNR, 2021), mine data mapping (ODNR, 2021), and land cover dataset mapping (USGS, 2016).

The desktop habitat assessment indicated that no potential bat hibernaculum present within 0.25-miles of the Project Study Area (**Appendix A, Figure 4**). No mining activities or karst topography was identified within 0.25-mile of the Project Study Area. The closest active mining operation is located approximately 15 miles east of the Project Study Area. In addition, the Project Study Area is not located within a karst region that could be used as a natural hibernaculum. The Project Study Area is located approximately 10 miles to the west of a karst topographic region (**Appendix A, Figure 4**).

In addition, a surface water delineation was completed on September 10, 2021, at which time summer and winter bat habitat was concurrently assessed. Based on the field investigations, no summer or winter bat habitat was identified within the Project Study Area. During field investigations, photographs of the Project Study Area were taken, which depict the latest site conditions (**Appendix B**).

Furthermore, no summer or winter bat habitat was identified within the Project Study Area and potential bat hibernaculum is not likely present within 0.25-mile of the Project Study Area;



therefore, it is TRC's opinion that federally- or state- listed bats species are not likely to be impacted by this proposed Project. We request your concurrence or recommendations in order for the Project to proceed.

Please do not hesitate to contact me at 614-423-6342 or via email at mmolnar@trccompanies.com if you have any questions or require additional information.

Regards,

Maggie M. Molnar, PWS

Ecologist

Appendices:

Maggie M. Mhar

Appendix A: Figures

Figure 1: Site Location Map

Figure 2: Aerial Map

Figure 3: National Land Cover Database Map

Figure 4: Mine/Karst Map

Appendix B: Photographic Record



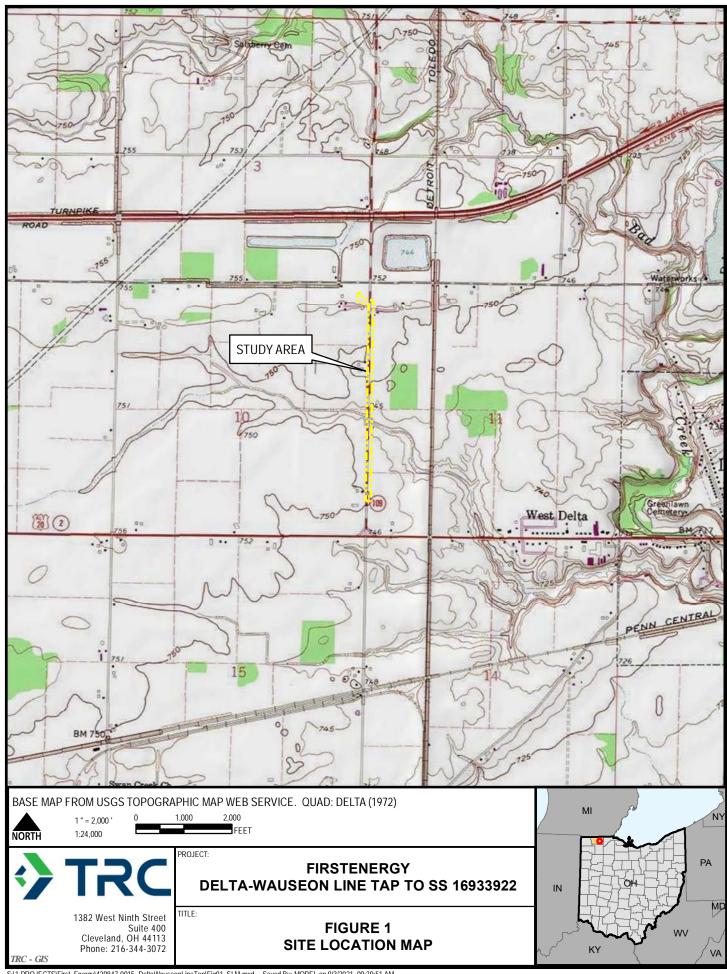
References

- Google Earth. (2021). Google Earth Images of Project Area. Date accessed October 15, 2021.
- ODNR. (2021). *Karst Interactive Map, ODNR Division of Geological Survey*. Retrieved from OhioDNR: https://gis.ohiodnr.gov/website/dgs/karst_interactivemap/
- ODNR. (2021). *Mines of Ohio, ODNR Division of Mineral Resources*. Retrieved from OhioDNR: https://gis.ohiodnr.gov/MapViewer/?config=OhioMines
- USGS. (2016). *National Land Cover Database*. Retrieved from https://www.usgs.gov/centers/eros/science/national-land-cover-database?qt-science_center_objects=0#qt-science_center_objects



Appendix A

Figures





0 500 1,000 Feet 1 " = 500 ' 1:6,000



FIRSTENERGY DELTA-WAUSEON LINE TAP TO SS 16933922

FIGURE 2 AERIAL MAP



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

PTEMBER 2021

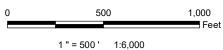
Fig02_Aerial.mxd



STUDY AREA

NLCD Land Cover Classification Legend 11 Open Water 12 Perennial Ice/ Snow 21 Developed, Open Space 22 Developed, Low Intensity 23 Developed, Medium Intensity 24 Developed, High Intensity 31 Barren Land (Rock/Sand/Clay) 41 Deciduous Forest 42 Evergreen Forest 43 Mixed Forest 51 Dwarf Scrub* 52 Shrub/Scrub 71 Grassland/Herbaceous 72 Sedge/Herbaceous* 73 Lichens* 74 Moss* 81 Pasture/Hay 82 Cultivated Crops 90 Woody Wetlands







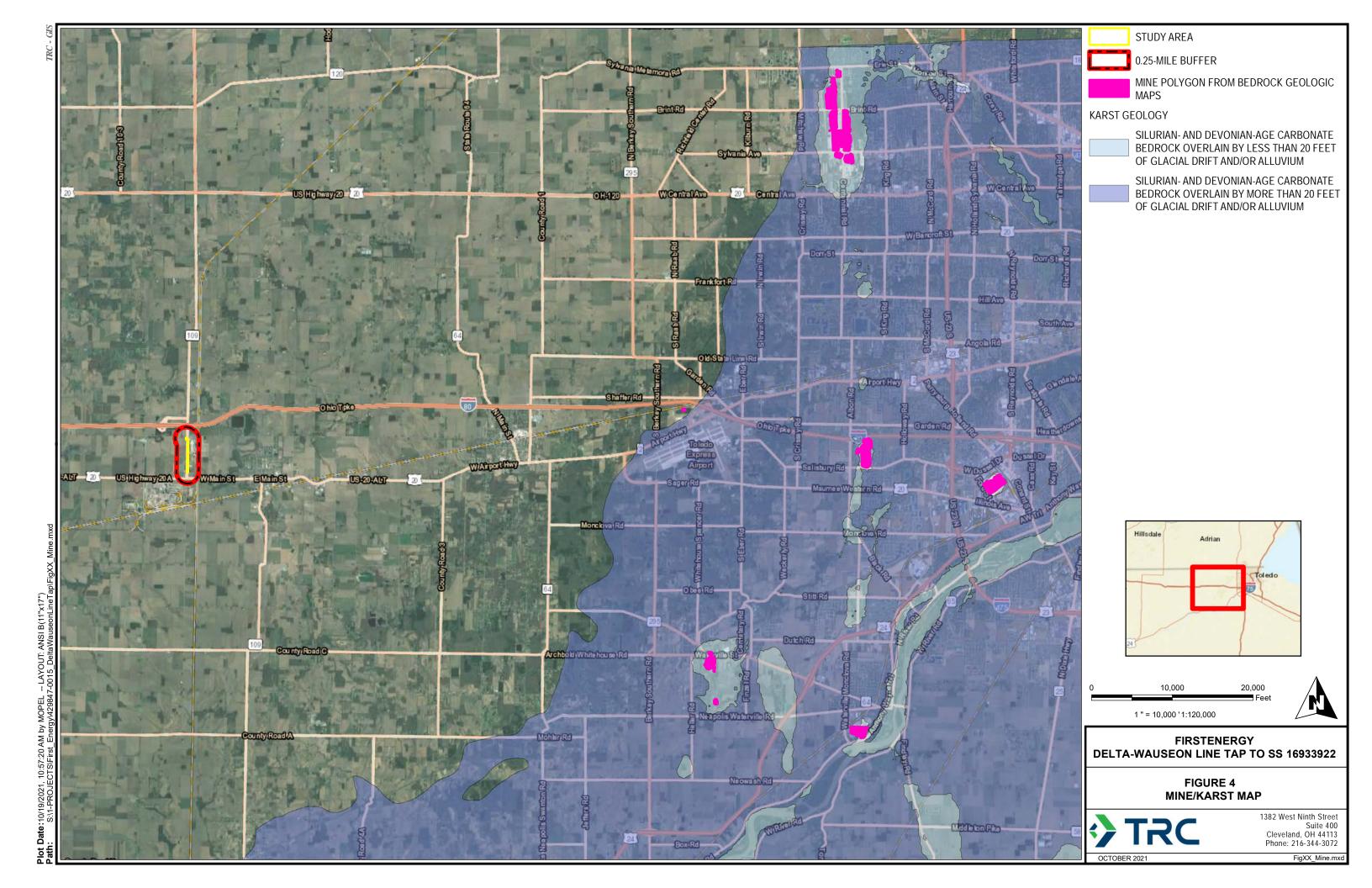
FIRSTENERGY DELTA-WAUSEON LINE TAP TO SS 16933922

FIGURE 3 NATIONAL LAND COVER DATABASE MAP



Suite 400 Cleveland, OH 44113 Phone: 216-344-3072

Fig03_NLCD.mxd





Appendix B

Photographic Record



Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Client Name:

Toledo Edison, A FirstEnergy Company

Site Location:

City of Delta and York Township, Fulton County, Ohio

Project No.

429847.0015.0000

Photo No. 1.

Date:

09/10/2021

Description:

Stream S-MRR-1 looking upstream, facing northwest.



Photo No. 2.

Date:

09/10/2021

Description:

Stream S-MRR-1 looking downstream, facing southeast.





Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Client Name:

Toledo Edison, A FirstEnergy Company

Site Location:

City of Delta and York Township, Fulton County, Ohio

Project No.

429847.0015.0000

Photo No. 3.

Date:

09/10/2021

Description:

Photo of the substrate within S-MRR-1.

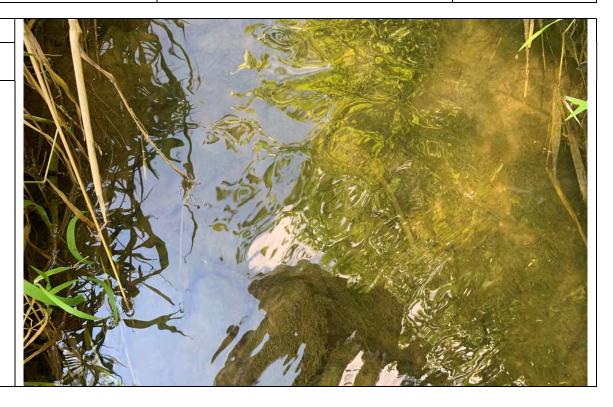


Photo No. 4.

Date:

09/10/2021

Description:

Wetland rule out point, ROP-MRR-1, facing north.





Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Client Name:

Toledo Edison, A FirstEnergy Company

Site Location:

City of Delta and York Township, Fulton County, Ohio

Project No.

429847.0015.0000

Photo No. 5.

Date:

09/10/2021

Description:

Wetland rule out point, ROP-MRR-1, facing south.



Photo No. 6.

Date:

09/10/2021

Description:

Looking towards northern portion of Project Study Area west of State Route (SR) 109, facing west.





Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Client Name:

Toledo Edison, A FirstEnergy Company

Site Location:

City of Delta and York Township, Fulton County, Ohio

Project No.

429847.0015.0000

Photo No. 7.

Date:

09/10/2021

Description:

Looking towards northern portion of the Project Study Area from the west side of SR 109, facing east.



Photo No. 8.

Date:

09/10/2021

Description:

Looking towards northern portion of the Project Study Area from the east side of SR 109, facing north.





Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Client Name:

Toledo Edison, A FirstEnergy Company

Site Location:

City of Delta and York Township, Fulton County, Ohio

Project No.

429847.0015.0000

Photo No. 9.

Date:

09/10/2021

Description:

Looking towards central portion of the Project Study Area from the east side of SR 109, facing north.



Photo No. 10.

Date:

09/10/2021

Description:

Looking towards southern portion of the Project Study Area from the east side of SR 109, facing south.





Delta-Wauseon 138 kV Transmission Line Tap to Winameg Area Substation Project

Client Name:

Toledo Edison, A FirstEnergy Company

Site Location:

City of Delta and York Township, Fulton County, Ohio

Project No.

429847.0015.0000

Photo No. 11.

Date:

09/10/2021

Description:

Looking towards southern portion of the Project Study Area from the east side of SR 109, facing south.



Photo No. 12.

Date:

09/10/2021

Description:

Looking north towards the southern portion of the Project Study Area from east of SR 109.



Exhibit 12

FW: Desktop Hibernacula Assessment: Delta-Wauseon 138kV Transmission Line Tap to Winameg Area Substation Project

Ruggiero, Augustine <aruggiero@firstenergycorp.com>

Wed 11/10/2021 1:33 PM

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

From: Erin.Hazelton@dnr.ohio.gov < Erin.Hazelton@dnr.ohio.gov >

Sent: Wednesday, November 10, 2021 10:12 AM **To:** Molnar, Maggie < MMolnar@trccompanies.com **Cc:** Falkinburg, Brad < BFalkinburg@trccompanies.com

Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: Delta-Wauseon 138kV Transmission Line Tap to

Winameg Area Substa on Project

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Hi Maggie,

Per review of the desktop survey provided for the Delta-Wauseon Transmission Line project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area and impacts to hiberna ng bats is not likely to occur.

Should any condi ons of the project change before or during construc on, please contact me for addi onal guidance.

Sincerely, Erin



Erin Hazelton (she/her/hers) Wind Energy Administrator ODNR Division of Wildlife 2045 Morse Rd. Bldg G-3 Columbus, OH 43229 1-800-WILDLIFE

Office: 614-265-6349

Email: erin.hazelton@dnr.ohio.gov

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