

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

CONSTRUCTION NOTICE

**EAST FAYETTE-STRYKER 138 KV TRANSMISSION LINE
STRUCTURE REPLACEMENT PROJECT
OPSB CASE NO.: 25-0163-EL-BNR**

September 24, 2025

**American Transmission Systems, Incorporated
341 White Pond Drive
Akron, OH 44320-1119**

CONSTRUCTION NOTICE
EAST FAYETTE-STRYKER 138 kV TRANSMISSION LINE
STRUCTURE REPLACEMENT PROJECT
OPSB CASE No. 25-0163-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 (“OPSB”) as a Construction Notice application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name and Reference Number

Name: East Fayette-Stryker 138 kV Transmission Line
Structure Replacement Project (“Project”)

Reference Number: 3161

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to replace and relocate one wood pole structure on the East Fayette-Stryker 138 kV Transmission Line approximately 30 feet south of the existing structure location along the same centerline. The existing conductor and static wire will be transferred to the new structure. The structure supports both the East Fayette-Stryker 138 kV Transmission Line and the Snyder-Stryker 69 kV Transmission Line. The structure is being replaced as part of the Snyder-Stryker (West Unity) 69 kV Transmission Line Rebuild Project.

The Project is in Springfield Township, Williams County, Ohio. The general location of the Project is shown in Exhibit 1, a partial copy of the United States Geologic Survey, Williams County OH, Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery of the Project area. The general layout is shown in Exhibit 3.

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 (2)(b) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm.Code 4906-1-01. This item states:

(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 line or replacing structures with a different type of structure, for a distance of:

(a) Less than two miles.

The proposed Project is within the requirements of Item (2)(b) as it involves replacing one (1) structure with a different type of structure, on the same centerline as the existing transmission line within the existing right-of-way.

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

ATSI identified a need to rebuild the Snyder-Stryker (West Union) 69 kV Transmission Line due to condition as presented to PJM at its March 18, 2022 (Need) and June 14, 2024 (Solution) SRRTEP-Western Meetings. The presentation slides are included as Exhibit 4 and PJM assigned supplemental number s3496.1 for that Project.

Immediately outside of Stryker Substation, the Snyder-Stryker (West Union) 69 kV Transmission Line shares common structures with the East Fayette-Stryker 138 kV Transmission Line for approximately 0.5 mile from Structure 1380 to Structure 1369. Of the twelve common structures, only one structure, Structure 1377 is not being replaced “like-for-like.” Proposed Structure 1377 is a slightly taller wood structure that will be installed approximately 30 feet, along the centerline, south of its existing location. Existing Structure 1377 will be topped off and will continue to carry 12.47 and 7.2 kilovolt distribution lines.

As this is associated with a condition-based rebuild of a 69 kV transmission line and the existing conductor and static wire will be transferred to the new structures, advanced transmission technologies were not viable for this Project.

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 PUCO in Case No. 25-0504-EL-FOR under Adm.Code 4901:5-5:04(C)(2)(b). The map is incorporated by reference only. The Snyder-Stryker (West Unity) 69 kV Transmission Line Rebuild Project is included on Page 83 in the LTFR filed in 2025. The general location and layout of the Project area is shown in Exhibits 1 and 2.

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

The only alternative considered for this section was to reuse the existing poles to install new conductor, insulators and hardware on the 69 kV transmission line side. This is not preferred given the age and condition of the structures. Additionally, by rebuilding this section now, it will keep all facilities within this section on the same maintenance cycle. This will prevent future outages needed to maintain the adjacent circuit, given that both will be on the same cycle.

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

Finally, during all phases of this Project, ATSI will maintain the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com where the public may ask questions or leave comments on the Project for ATSI.

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

Construction on this Project is expected to begin as early as March 1, 2026, and be completed by December 31, 2026, at which time the Project will be placed in service. Permanent restoration will not conclude until after the Snyder-Stryker (West Unity) 69 kV Transmission Line Rebuild is complete, though the Project area will be temporarily restored as part of ATSI's Stormwater Pollution Prevention Plan ("SWPPP").

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

Exhibit 1 depicts the general location of the Project. This Exhibit provides a partial copy of the United States Geologic Survey, Williams County OH, Quad Map. Exhibit 2 is a copy of ESRI aerial imagery of the Project area.

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

The Project is located entirely within the existing right-of-way on parcel 064-050-03-005.000 owned by Ronnie A. Clair, *et al.*, and the road Right of Way of W. Railroad Street. No new Easements will be required for completion of this 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:	636 kcmil 37 Strand AAC (Existing)
Static Wire:	7#10 Alumoweld (Existing)
Insulators:	Polymer
ROW Width:	60'
Structure Types:	Exhibit 5: 138 kV Double-Circuit Wood Pole Tangent Structure (Qty. 1)

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

There are no occupied residences or institutions within 100 feet from the proposed transmission line centerline and therefore no Electric and Magnetic Field (“EMF”) calculations are required by this subsection.

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

The estimated cost for the proposed Project is \$197,500. 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 in Springfield Township, Williams County, Ohio. The main land use around the Project area is zoned as mixed. Because the proposed Project involves replacing one (1) structure within an existing transmission corridor, no significant changes or impacts to the current land use are anticipated.

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

Agricultural land (primarily cultivated cropland) exists within the Project’s Area of Potential Effect (“APE”), though none of the parcels are designated as Agricultural Districts. Agricultural land surrounds the parcel, but there are no crops on the parcel where construction will take place.

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

As part of the investigation for this Construction Notice, on April 22, 2025, AECOM Technical Services, Inc. (“AECOM”) submitted a request to the Ohio Historic Preservation Office (“SHPO”) on behalf of ATSI to review and provide comments for the Project Study Area (Area of Potential Effects or “APE”) with a one (1)-mile search radius.

On June 2, 2025, SHPO replied to the request and the response is attached as Exhibit 6. 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 also includes the Ohio Historic Inventory (“OHI”), the Ohio Archaeological Inventory (“OAI”), previous cultural resource surveys, and the Ohio Genealogical Society (“OGS”) cemetery inventory. The SHPO database includes all Ohio listings on the National Register of Historic Places (“NRHP”), including districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The results of the search indicate that within 1.0 mile of the Project Study Area there are no NRHP-listed above-ground resources and no OGS cemeteries.

According to the review, no historic properties, districts, previously recorded archaeological sites, or resources fifty years of age or older determined to be potentially eligible for the NRHP were identified within the APE.

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

No additional government agency authorizations or permits are required for this Project.

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

As part of the investigation, ATSI retained AECOM to conduct necessary surveys. AECOM 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 (“DOW”) 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 May 14, 2025, stated that the Project is within range of 25 listed 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 the range of the Project is provided in Table 1.

Table 1. List of Endangered and Threatened Species within range of Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Mammals				
Indiana bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees and forests
Northern long-eared bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees and forests
Tricolored bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Endangered	Trees and forests
Little brown bat	<i>Myotis lucifugus</i>	NA	Endangered	Trees and forests
Birds				
Northern Harrier	<i>Circus cyaneus</i>	NA	Endangered	Large marshes and grasslands
Sandhill Crane	<i>Antigone canadensis</i>	NA	Threatened	Large marshes
Reptiles and Amphibians				
Copperbelly water snake	<i>Nerodia erythrogaster neglecta</i>	Threatened	Endangered	Isolated and floodplain wetlands
Blanding's turtle	<i>Emydoidea blandingii</i>	NA	Threatened	Marshes, ponds, lakes, streams, and wet meadows
Spotted turtle	<i>Clemmys guttata</i>	NA	Threatened	Wet prairies, meadows, ponds, small streams/ditches
Blue-spotted salamander	<i>Ambystoma laterale</i>	NA	Endangered	Moist woods and small ponds
Fish				
Iowa darter	<i>Etheostoma exile</i>	NA	Endangered	Perennial Streams
Gilt darter	<i>Percina evides</i>	NA	Endangered	Perennial Streams
Pugnose minnow	<i>Opsopoeodus emiliae</i>	NA	Endangered	Perennial Streams
Western banded killfish	<i>Fundulus diaphanous menona</i>	NA	Endangered	Perennial Streams
Greater redhorse	<i>Moxostoma valenciennesi</i>	NA	Threatened	Perennial Streams
Lake chubsucker	<i>Erimyzon sucetta</i>	NA	Threatened	Perennial Streams
Mussels				
Clubshell	<i>Pleurobema clava</i>	Endangered	Endangered	Perennial Streams
Northern riffleshell	<i>Epioblasma rangiana</i>	Endangered	Endangered	Perennial Streams
Rayed bean	<i>Villosa fabalis</i>	Endangered	Endangered	Perennial Streams

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
White cat's paw	<i>Epioblasma perobliqua</i>	Endangered	Endangered	Perennial Streams
Purple lilliput	<i>Toxolasma lividus</i>	Endangered	Endangered	Perennial Streams
Rabbitsfoot	<i>Theliderma cylindrica</i>	Endangered	Endangered	Perennial Streams
Long-solid	<i>Fusconaia maculata</i>	NA	Endangered	Perennial Streams
Sharp-ridged pocketbook	<i>Lampsilis ovata</i>	NA	Endangered	Perennial Streams
Salamander mussel	<i>Simpsonaias ambigua</i>	NA	Threatened	Perennial Streams

Based on the information received from correspondence with ODNR, the Project is within range of the federally and state endangered Indiana bat (*Myotis sodalis*), the federally threatened and state endangered northern long-eared bat (*Myotis septentrionalis*), the state endangered little brown bat (*Myotis lucifugus*), and the state endangered tricolored bat (*Perimyotis subflavus*). These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost trees. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which AECOM completed for ATSI and submitted to ODNR for concurrence on June 19, 2025. ODNR responded on June 30, 2025, attached as Exhibit 7A, concurring that no caves, cliffs, or mine openings occur in the Project Area. In addition, due to the type, size, and location, the proposed Project is not likely to impact these species.

The ODNR determined that the Project is within range of four state listed reptiles and amphibians. The type of habitat that these species prefer, as denoted by ODNR, is not present within the Project Study Area. Therefore, ODNR concluded that, “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 [these] species.”

The ODNR DOW indicated the Project is within range of the Northern Harrier (*Circus cyaneus*). For Northern Harrier, the ODNR DOW commented that impacts to large marshes and grasslands should be avoided during the nesting period of May 15 to August 1. AECOM, on behalf of ATSI, completed a habitat assessment for the Northern Harrier on June 17, 2025. The habitat assessment determined no nesting habitat to be present given there were no grasslands of sufficient size and proximity to human habitation. No further action was requested by DOW in their response (Exhibit 7B). Therefore, no seasonal restrictions are required for the Project.

The ODNR DOW indicated the Project is within range of the Sandhill Crane (*Antigone canadensis*). For Sandhill Crane, the ODNR DOW commented that impacts to large tracts of wet meadows, shallow marshes, and bogs should be avoided during the nesting period of April 1 to August 31. AECOM, on behalf of ATSI, completed a habitat assessment for the Sandhill Crane on June 17, 2025. The habitat assessment determined no nesting or foraging habitat to be present given a lack of suitable wetland. No further action was requested by DOW in their response (Exhibit 7B). Therefore, no seasonal restrictions are required for the Project.

The ODNR DOW requested no in-water work in perennial streams to avoid impacts to native mussels, as all species of mussel are protected in Ohio. In addition, ODNR DOW requested no in-water work in perennial streams between March 15 and June 30 to reduce impacts to fish species (Table 1). No streams or wetlands were observed in the Study Area; all streams and wetlands were determined to be outside of the Project impact area. Given no in-water work is proposed for this Project, nor any perennial streams being identified, the Project aligns with ODNR DOW's conclusion that the "project is not likely to impact these or other aquatic species."

As part of the investigation, AECOM submitted a request to the U.S. Fish and Wildlife Service ("USFWS") for an Ecological Review to research the presence of any endangered, threatened, rare, or designated species within one (1) mile of the Project Area. A copy of USFWS's Ecological Review response, dated April 29, 2025, included in Exhibit 8. The

USFWS determined that the Project is within range of the federal endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*M. septentrionalis*), as well as the proposed federal endangered tri-colored bat (*Perimyotis subflavus*) and instructed ATSI to implement seasonal tree cutting restrictions. Aside from the potential bat impacts, the response indicated that due to the Project, type, size, and location, USFWS does not anticipate adverse effects to any other federally endangered, threatened, or proposed species or proposed or designated critical habitat.

The Project work limits do not include any in-stream activities but do encroach on a regulated flood plain (Tiffin River) based on a review of online FEMA Flood Insurance Rate Mapping.

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

On August 7-9, 2023, AECOM biologists conducted wetland and stream delineation with the Project area. The Project Study Area is approximately 0.18 acres, located in Springfield Township, Williams County, Ohio. No wetlands were found within the Project Study Area. The wetland and stream delineation report and photographic record are included in Exhibit 9.

A review of the National Conservation Easement Database (www.conservationeasement.us) revealed no conservation easements in the Project Study 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 to the following officials in Springfield Township and Williams County, Ohio.

Williams County

Mr. Terry N. Rummel, President
Williams County Commissioner
One Courthouse Square, 4th Floor
Bryan, OH 43506
trummel@wmsco.org

Mr. Todd J. Roth P.E., P.S.
Williams County Engineer's Office
12953 County Road G
Bryan, OH 43506
troth@wmscoengineer.com

Mr. Scott A. Lirot, Vice-President
Williams County Commissioner
One Courthouse Square, 4th Floor
Bryan, OH 43506
слиrot@wmsco.org

Mr. Dennis Miller, Director
Williams County
Regional Planning Commission
12953 County Road G
Bryan, OH 43506
dmiller@mvpо.org

Mr. Bartley E. Westfall,
Commissioner
Williams County Commissioner
One Courthouse Square, 4th Floor
Bryan, OH 43506
bwestfall@wmsco.org

Mr. Chris Dancer, District Admin.
Williams County
Soil & Water District
1120 West High Street
Bryan, OH 43506
cdancer@williamsswcd.org

Springfield Township

Mr. Rusty Goebel, Trustee
Springfield Township
05870 County Road
Stryker, OH 43557
hogfarm@williams-net.com

Patti L. Rosebrock, Trustee
Springfield Township
304 East Curtis Street
Stryker, OH 43557
patrosebrock@yahoo.com

Mr. Steve Planson, Trustee
Springfield Township
22199 County Road F
Stryker, OH 43557
steveplanson@gmail.com

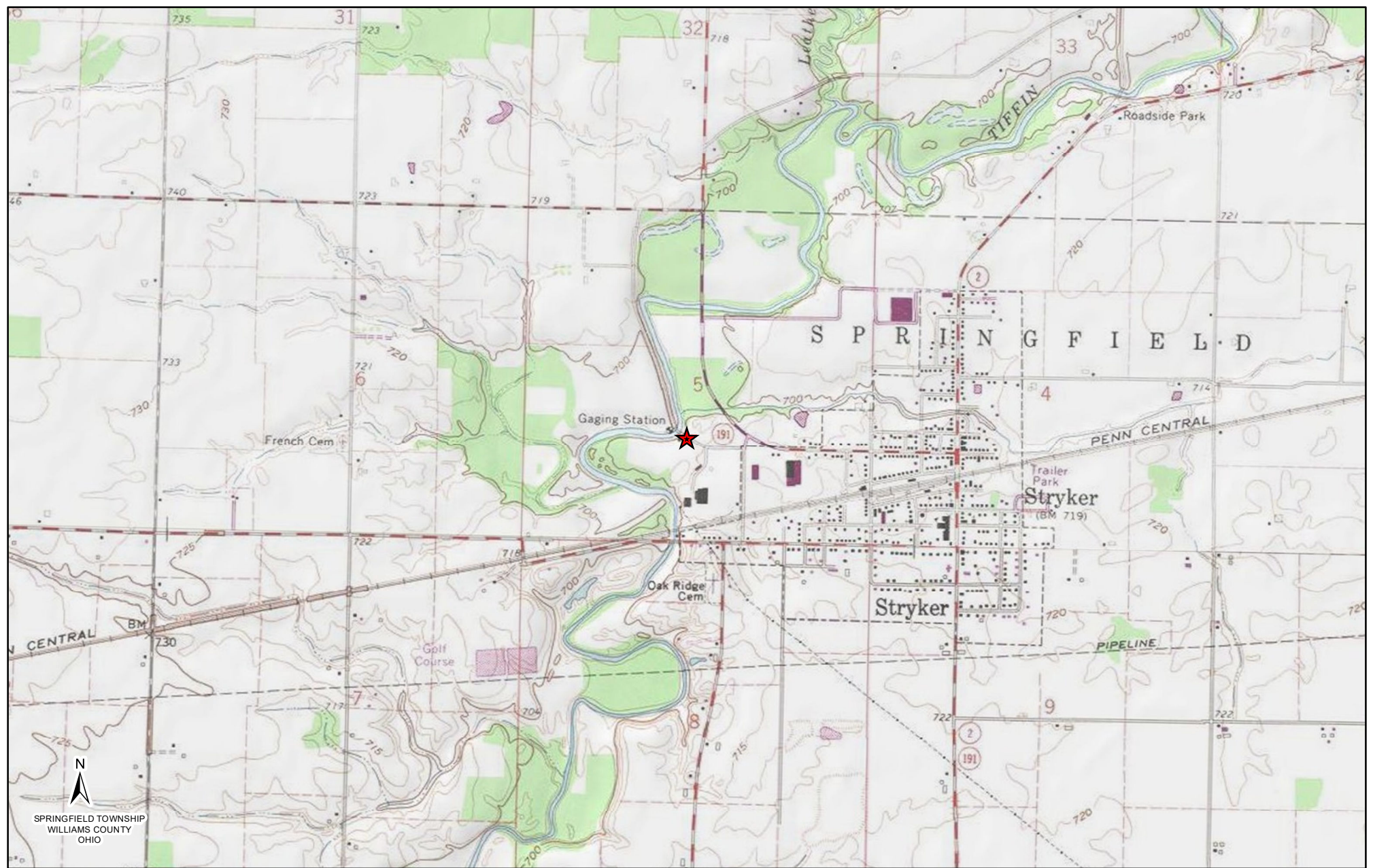
Mr. Ed Ruffer, Fiscal Officer
Springfield Township
03075 County Road
Stryker, OH 43557
edruffer@yahoo.com

Library

Connie Aeschliman, Branch Manager
Stryker Branch Library
304 South Defiance Street
Stryker, OH 43557
connie@mywcpl.org

Per Adm.Code 4906-6-07(B), exemplar copies of the notice letters sent to local government officials and to the library have been included with this application as proof of compliance with requirements of Adm.Code 4906-6-07(A)(1) and 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 in accordance with Adm.Code 4906-6-07(B), which requires ATSI to provide the OPSB with proof of compliance with Adm.Code 4906-6-07(A)(3).





N
SPRINGFIELD TOWNSHIP
WILLIAMS COUNTY
OHIO

LEGEND:

★ Project Location

0 1,000 2,000 4,000
Feet

Reference:

ESRI Image, ODOT

Coordinate System:

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



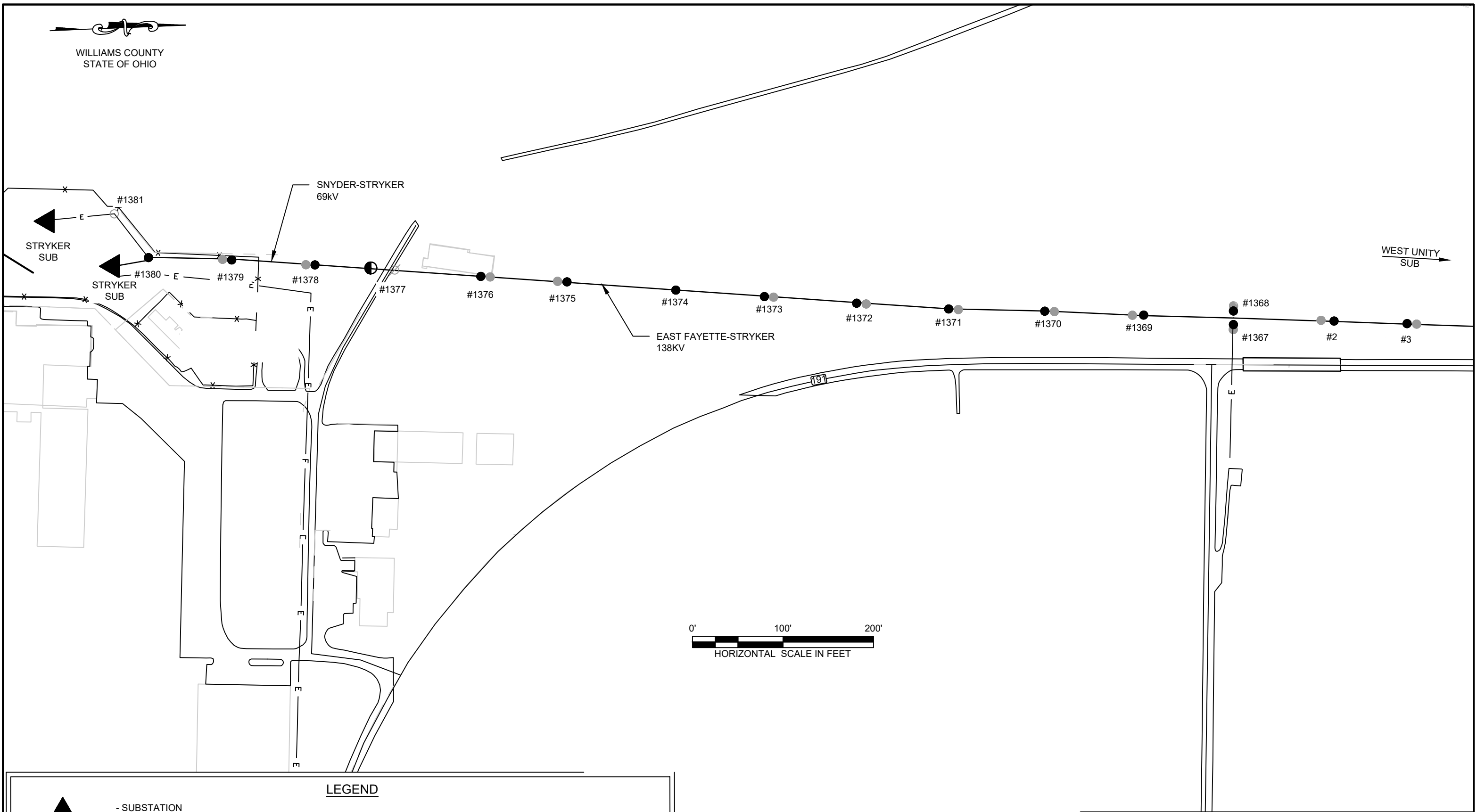
EXHIBIT 2

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

**East Fayette-Stryker 138 kV Transmission Line
Structure Replacement Project**



WILLIAMS COUNTY
STATE OF OHIO



LEGEND

- | | | | |
|--|---|--|---------------------------|
| | - SUBSTATION | | - CONDUCTOR |
| | - STRUCTURE TO BE REPLACED/RELOCATED | | - CONDUCTOR TO BE REMOVED |
| | - EXISTING TRANSMISSION STRUCTURE TO REMAIN | | - EXISTING LINE |
| | - STRUCTURE TO BE REMOVED | | - FENCE |
| | - LIKE-FOR-LIKE STRUCTURE REPLACEMENT | | - EDGE OF PAVED ROAD |



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

EAST FAYETTE-STRYKER 138 kV
TRANSMISSION LINE
STRUCTURE REPLACEMENT PROJECT

GENERAL LAYOUT

EXHIBIT 3

Need Number: ATSI-2022-006
Process Stage: Need Meeting – 03/18/2022

Supplemental Project Driver(s):
Equipment Material Condition, Performance, and Risk
Infrastructure Resilience

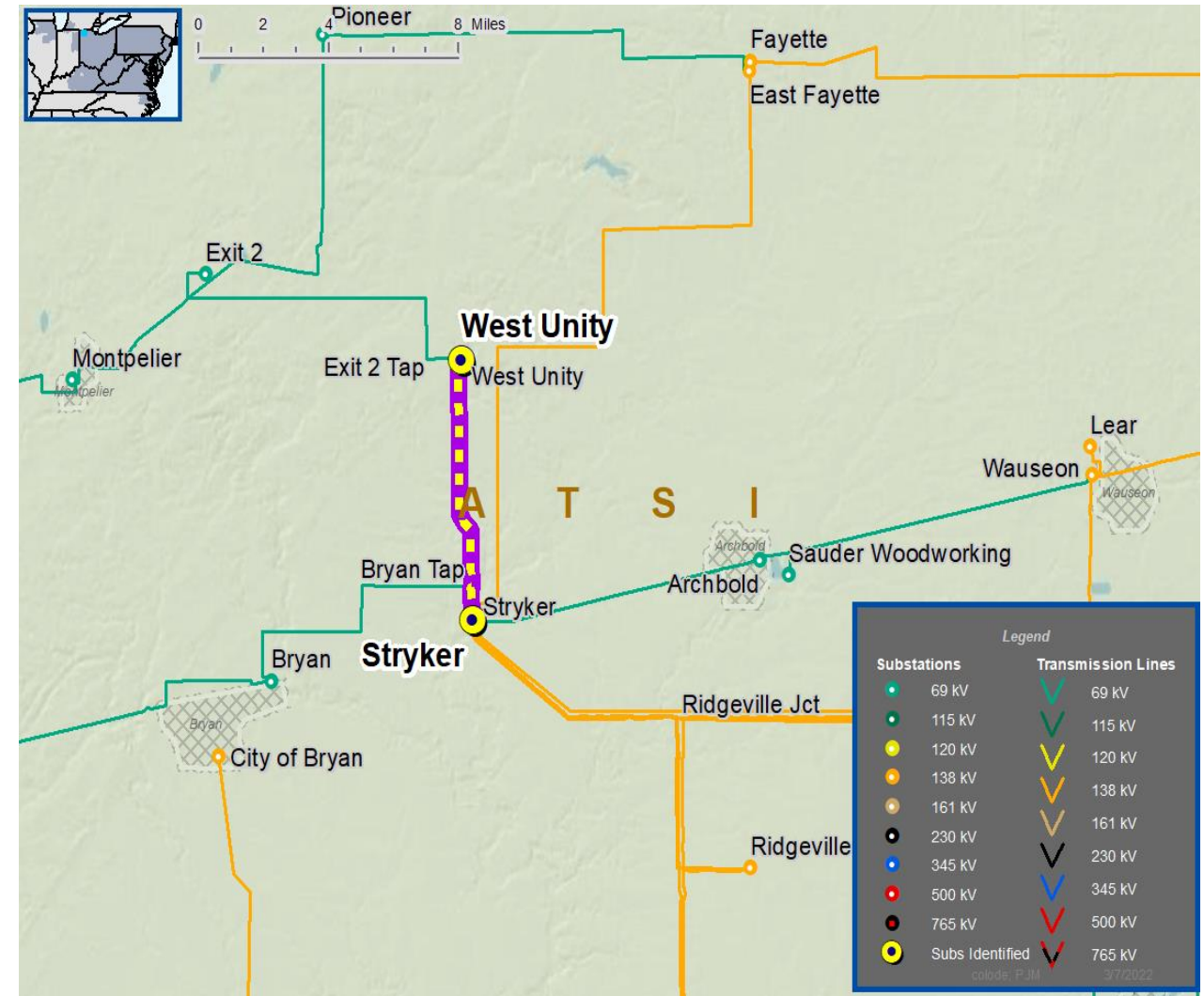
Specific Assumption Reference(s):

Global Factors

- System Reliability and Performance
- Increasing negative trend in maintenance findings
- Age/condition of transmission line conductor, hardware and structures
- Negatively impact customer outage frequency and/or duration

Problem Statement

- The West Unity (Stryker) 69 kV Line (~11.2 miles) is wood pole construction that is aged and experiencing degradation:
 - 53 of 258 structures had defects noted that could negatively impact reliability, with the most common defect noted being structure decay.
 - 235 of 258 structures are aged and reaching the end of their useful life, with average date of installation of 1967.
- A stretch of double circuit structures were replaced in the 1990's (~1.5 miles) and found to be in fair condition.



ATSI Transmission Zone M-3 Process West Unity (Stryker) 69 kV Line

Need Number: ATSI-2022-006
Process Stage: Solutions Meeting – 06/14/2024
Previously Presented: Need Meeting – 03/18/2022

Supplemental Project Driver(s):

*Equipment Material Condition, Performance, and Risk
 Infrastructure Resilience*

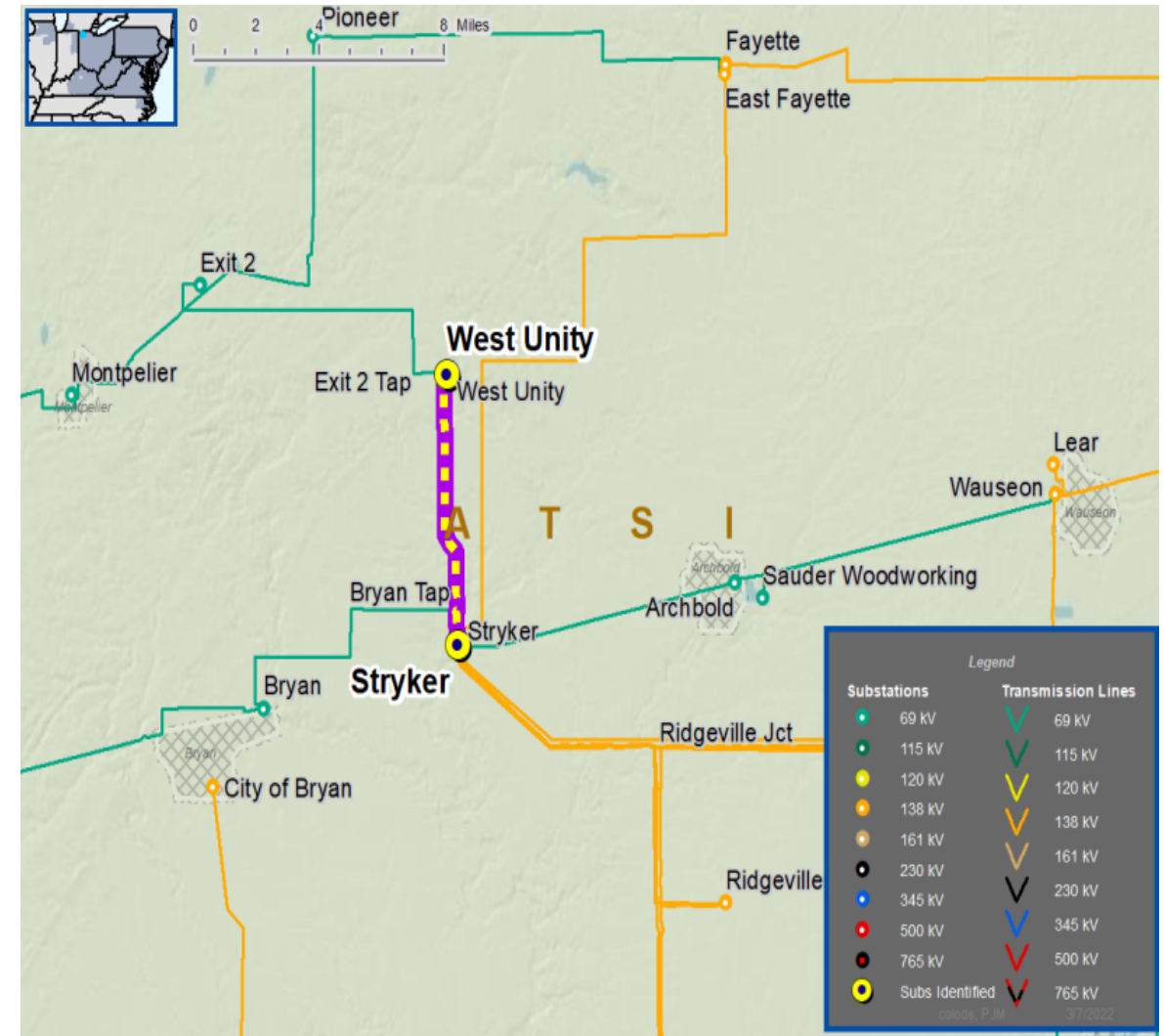
Specific Assumption Reference(s):

System Performance Projects Global Factors

- System Reliability and Performance
- Increasing negative trend in maintenance findings
- Age/condition of transmission line conductor, hardware and structures
- Negatively impact customer outage frequency and/or duration

Problem Statement

- The West Unity (Stryker) 69 kV Line (~11.2 miles) is wood pole construction that is aged and experiencing degradation:
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 - 235 of 258 structures are aged and reaching the end of their useful life, with average date of installation of 1967.
- A stretch of double circuit structures were replaced in the 1990's (~1.5 miles) and found to be in fair condition.





Need Number: ATSI-2022-006
Process Stage: Solutions Meeting – 06/14/2024

Proposed Solution:

West Unity (Stryker) 69 kV Line Rebuild

- Rebuild the West Unity (Stryker) 69 kV Line (total rebuild length approximately 11.6 miles).

Transmission Line Ratings:

▪ **Snyder – West Unity 69 kV Line**

- Before Proposed Solution: 72 / 87 / 84 / 107 MVA (SN/SE/WN/WE)
- After Proposed Solution: 111 / 135 / 126 / 159 MVA (SN/SE/WN/WE)

Stryker – West Unity 69 kV Line

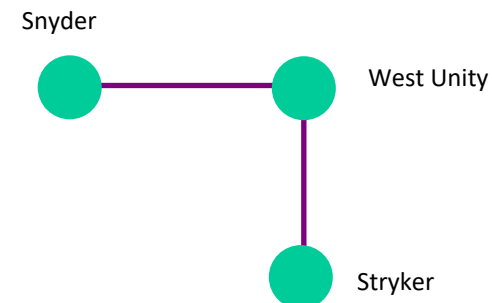
- Before Proposed Solution: 72 / 87 / 84 / 107 MVA (SN/SE/WN/WE)
- After Proposed Solution: 111 / 135 / 126 / 159 MVA (SN/SE/WN/WE)

Alternatives Considered:

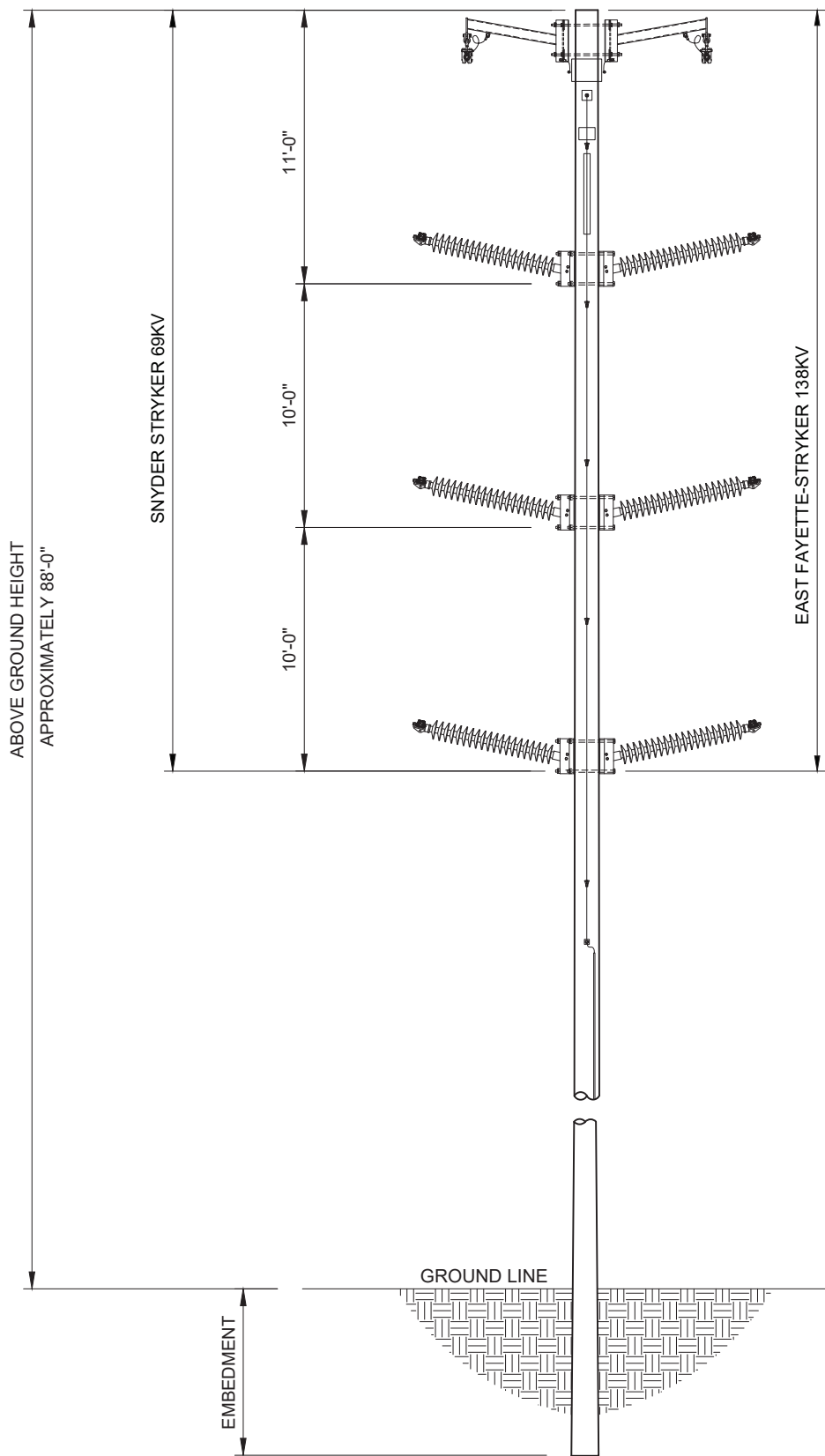
- Maintain existing condition and elevated risk of failure due to aging infrastructure.

Estimated Project Cost: \$18.1M
Projected In-Service: 12/31/2025
Status: Conceptual
Model: 2023 RTEP model for 2028 Summer (50/50)

ATSI Transmission Zone M-3 Process West Unity (Stryker) 69 kV Line



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



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

EAST FAYETTE-STRYKER 138 kV TRANSMISSION LINE
STRUCTURE REPLACEMENT PROJECT

138KV DOUBLE CIRCUIT WOOD POLE
STRUCTURE HORIZONTAL POST VERTICAL SINGLE POLE
ANGLES 0° TO 2°

EXHIBIT 5



EXHIBIT 6

In reply refer to:
2025-WIL-64876

June 2, 2025

Justin Warrenfeltz, M.A., RPA
Senior Project Archaeologist
AECOM
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876
Email: justin.warrenfeltz@aecom.com

RE: Section 106 Review: West Unity 138kV-Structure 1377 Project, Stryker, Williams County, Ohio

Dear Mr. Warrenfeltz:

This letter is in response to the correspondence received on April 25, 2025, regarding the above-referenced project in Williams County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are 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 Federal Energy Regulatory Commission (FERC) is the lead agency for the undertaking.

The proposed project consists of the replacement of one wooden pole and support anchor. The pole is located adjacent to a paved roadway. Ground disturbance will be restricted to the pole and anchor location. The new pole will be similar in height to the existing one; therefore, no new visual impacts are anticipated. Based on information submitted by you, which included a Project Summary Form, no historic properties, districts, or archaeological sites are located within the direct Area of Potential Effect (APE), as defined by you. Based on this information, it is the SHPO's opinion that no cultural resource studies are warranted for the project. Furthermore, as proposed, the project will have no effect on historic properties. No further coordination is required for this project unless the scope of work changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as required by 36 CFR § 800.13. If you have any questions concerning this review, please contact me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Stephen M. Biehl".

Stephen M. Biehl, Project Reviews Manager-Archaeology
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1108668



Office of Real Estate & Land Management

Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

May 14, 2025

Brian Bielfelt
AECOM
525 Vine Street, Suite 1900
Cincinnati, OH 45202

Re: 25-0586 - West Unity 138 kV Pole Replacement

Project: The proposed project involves the replacement of an existing structure located along the existing West Unity 138 kV Transmission line.

Location: The proposed project is located in Springfield Township, Williams 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. 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.

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 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 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 ≥ 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 Eileen Wyza at Eileen.Wyza@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 "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED 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 Eileen Wyza 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 following listed mussel species.

Federally Endangered

clubshell (*Pleurobema clava*)

northern riffleshell (*Epioblasma rangiana*)

rayed bean (*Villosa fabalis*)

white cat's paw (*Epioblasma perobliqua*)

purple lilliput (*Toxolasma lividus*)

rabbitsfoot (*Theliderma cylindrica*)

State Endangered

sharp-ridged pocketbook (*Lampsilis ovata*)

long-solid (*Fusconaia Subrotunda*)

State Threatened

Salamander Mussel (*Simpsonaias ambigua*)

This project must not have an impact on native mussels. This applies to both listed and non-listed species, as all species of mussel are protected in Ohio. Per the Ohio Mussel Survey Protocol (2024), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 5 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not

possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the [Ohio Mussel Survey Protocol](#). If there is no in-water work proposed, impacts to mussels are not likely.

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

State Endangered

gilt darter (*Percina evides*)

Iowa darter (*Etheostoma exile*)

pugnose minnow (*Opsopoeodus emiliae*)

western banded killifish (*Fundulus diaphanous menona*)

State Threatened

greater redhorse (*Moxostoma valenciennesi*)

lake chubsucker (*Erimyzon sucetta*)

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 these or other aquatic species.

The project is within the range of the copperbelly water snake (*Nerodia erythrogaster neglecta*), a state endangered and federally threatened species. 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 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 blue-spotted salamander (*Ambystoma laterale*), a state endangered species. 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 sandhill crane (*Antigone canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. 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.

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.

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.*

Stolarski, Adrianna

From: Eileen.Wyza@dnr.ohio.gov
Sent: Monday, June 30, 2025 9:30 AM
To: Stolarski, Adrianna; Bielfelt, Brian
Cc: Miller, Brian J (Ruszala, Amy M); Mike.Pettegrew@dnr.ohio.gov
Subject: [EXTERNAL] RE: 25-0586_AECOM - West Unity 138 kV Pole Replacement - ODNR Comments

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Hello Adrianna,

Thank you for the information. Given the lack of bedrock at that depth nearby, I do not think it will be necessary to expand the search radius as bedrock will not be impacted. Per review of the desktop survey provided for the West Unity 138 kV Pole Replacement Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Additionally, because the project does not involve blasting or impacting the bedrock, the project is not likely to impact hibernating bats.

Should any reported conditions change before or during construction, please contact me for additional guidance.

Thank you,

Eileen Wyza, Ph.D.
(she/her/hers)
Wildlife Biologist
Ohio Division of Wildlife
Phone: 614-265-6764
Email: Eileen.Wyza@dnr.ohio.gov



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Please consider the environment before printing this email.

From:

Stolarski, Adrianna <astolarski@firstenergycorp.com>

Sent: Thursday, June 19, 2025 8:46 AM

To: Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>; Bielfelt, Brian <Brian.Bielfelt@aecom.com>

Ohio Department of Natural Resources
Environmental Review Services
2015 Morse Road
Columbus, Ohio 43229

June 17, 2025

**Re: 25-0586 West Unity 138 kV Pole Replacement
American Transmission Systems, Inc., a FirstEnergy Company
Williams County, Ohio**

Dear ODNR Staff,

AECOM Technical Services, Inc. (AECOM), on behalf of American Transmission Systems, Inc. (ATSI), a FirstEnergy Company, submitted an Ohio Natural Heritage Database (NHD) and Environmental Review request for the West Unity (Stryker) 138 kV Transmission Pole Replacement Project (Project) in the Springfield Township, Williams County, Ohio on April 15, 2025 to determine potential impacts to state threatened or endangered species. The Project includes the repair, replacement, and/or modification of one 138 kV transmission pole. ATSI anticipates that work activities will be completed within the existing right-of-way (ROW). A response was received from the Ohio Department of Natural Resources (ODNR) on May 14, 2025. AECOM has prepared this memo to address recommendations made in the NHD for bat and bird species (**Table 1**).

Table 1: Responses to ODNR Comments

ODNR Recommendation / Requirement	AECOM Response	Conclusion
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 "RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED 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 [ODNR].	AECOM completed a desktop review of publicly available data and aerial imagery to identify the potential for known bat winter hibernacula within 0.25 miles of the Project area. The data sources utilized include USGS topographical maps and ODNR's Division of Mineral Resources and Geological Survey Data for Known Mining Activity and Karst Geology/Sinkholes. Based on the available desktop resources, there are no karst features located within 0.25-mile of the Project (Attachment 2). No mine openings or karst features are located within the Project or within the 0.25-mile buffer.	Hibernaculum are not known in the Project vicinity.
If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species	No tree cutting is planned for this project. Any tree trimming that may occur will be between October 1 and March 31.	No effect; project not impacting trees.

<p>If this type of [northern harrier] 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.</p>	<p>No open field or marshes of any sort are present within or near the Project area. The work associated with the Project will be located within a previously disturbed and cleared ROW with various developments and small, unsuitable for harrier.</p>	<p>No habitat present.</p>
<p>If this type of [sandhill crane] habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to impact this species.</p>	<p>No wet meadows, marshes, bogs were found within the Project area that are suitable for nesting. The work associated with the Project will be located within a previously disturbed and cleared ROW.</p>	<p>No habitat present.</p>

Based on the desktop assessment and lack of habitat within the Project area, the project is unlikely to result in adverse impacts to bat species, the Northern Harrier, or Sandhill Crane. Therefore, no further coordination with ODNR is required.

Sincerely,



Brian Bielfelt
Environmental Project Manager
AECOM

Enclosures:

Attachment 1: Photos of Project Site
Attachment 2: Bat Hibernacula Map

Attachment 1: Photos of Project Site

Client Name:

ATSI

Site Location:

West Unity 138kV Pole Replacement Project

Project No.

60696205

PH-1**Date:**

July 2024

Description:

Representative photo
within the Project area
facing Northeast

**PH-2****Date:**

July 2024

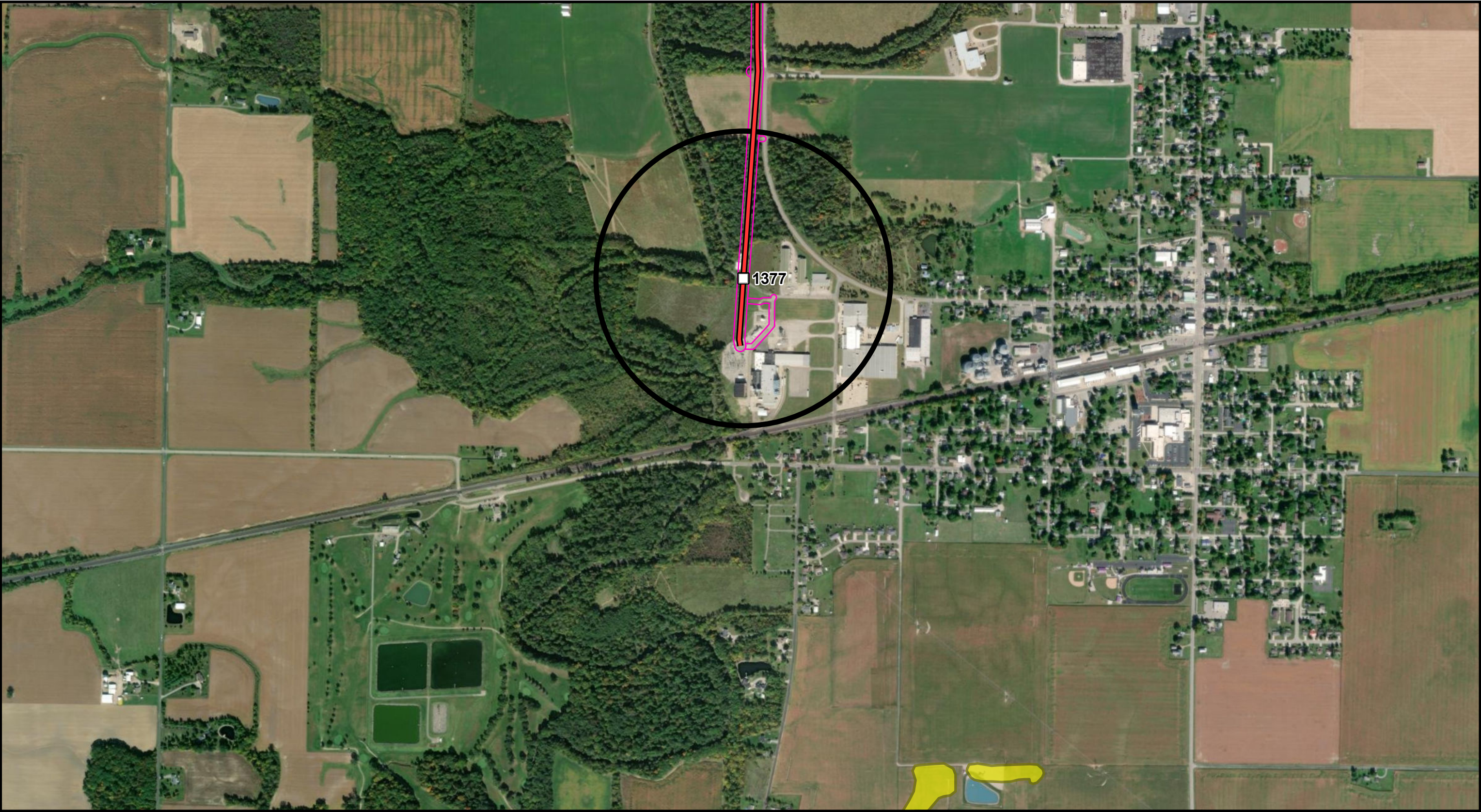
Description:

Representative photo
within the Project area
facing South

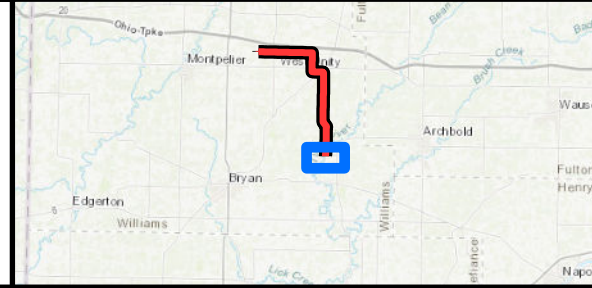
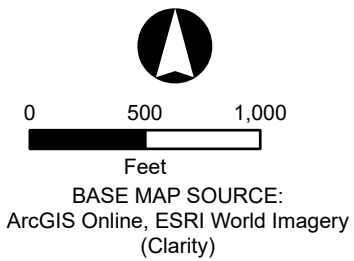



Attachment 2: Bat Hibernacula Map

Date Saved: 6/9/2025
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- LEGEND
- Existing Structure
 - Proposed West Unity 69 kV Rebuild Transmission Line
 - Survey Area
 - Surface Mine
 - Quarter Mile Buffer

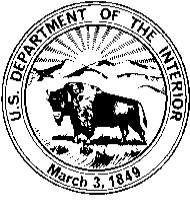




West Unity 69kV
Transmission Line Rebuild Project

BAT HIBERNACULA
ASSESSMENT MAP

JOB NO. 60696205



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994



April 29, 2025

Project Code: 2025-0083561

Dear Mr. Bielfelt:

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

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

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

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

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

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

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Knoll".

Erin Knoll
Field Office Supervisor

cc: Matthew.Stooksbury@dnr.ohio.gov
Eileen.Wyza@dnr.ohio.gov

April 15, 2025

Angela Boyer
Endangered Species Coordinator
U.S. Fish & Wildlife Service
Ohio Ecological Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

**West Unity (Stryker) 138 kV Transmission Pole Replacement Project
(IPaC # 2025-0083561)
Williams County, Ohio**

Dear Ms. Boyer,

AECOM Technical Services, Inc. (AECOM), on behalf of American Transmission Systems, Inc. (ATSI), a FirstEnergy Company, is submitting is requesting your technical assistance regarding federal listed species located within proximity to the First Energy West Unity (Stryker) 138 kV Transmission Pole Replacement Project (Project) in Springfield Township, Williams County, Ohio. The Project includes the replacement of one existing structure located along the existing West Unity 138 kV Transmission line. ATSI anticipates that work activities will only be completed within the existing right-of-way (ROW) for the structures proposed as modification/replacement. AECOM is requesting your review for the study area in the West Unity, U.S. Geologic Survey 7.5" topographic quadrangle (Figure 1).

AECOM reviewed the results of the Information for Planning and Consultation (IPaC) [#2025-0083561] has been completed for this Project and indicates the Project is within the range of Indiana bat (*Myotis sodalis*), copperbelly water snake (*Nerodia erythrogaster neglecta*), monarch butterfly (*Danas plexippus*), and Whooping Crane (*Grus americana*).

Due to the location of the Project activities being contained within existing maintained areas (i.e., existing ROWs and/or mowed areas) and surrounding ecosystem, habitat is not anticipated to be present for monarch butterfly, copperbelly water snake and/or Whooping Crane within the Project area. Furthermore, ATSI does not plan to require substantial clearing of forested habitat for the Project and if tree clearing is required, ATSI intends to clear trees between October 1st and March 31st to avoid adverse effects to state and/or federally listed bat species.

ATSI and AECOM are requesting technical assistance based on the Project summary provided above. For ease of your review, AECOM has attached Project overview figure, an ArcGIS shapefile of the study boundary and a copy of the completed IPaC. Additionally, ATSI and AECOM are also coordinating with the Ohio Department of Natural Resources Environmental Review Services regarding the Project.



ATSI and AECOM would appreciate an expedited review and response, as it will assist with ATSI's permit and construction teams in development of the Project that avoids and minimizes impacts to sensitive areas and species identified by your agency. Please feel free to contact Brian Bielfelt at 850.559.2871 or brian.bielfelt@aecom.com if you need any additional information.

Sincerely,

A handwritten signature in grey ink that reads "Brian Bielfelt".

Brian J. Bielfelt
Senior Ecologist
AECOM





brian.bielfelt@aecom.com

Enclosures: Figure 1 - Overview Map
IPaC
ArcGIS Shapefile of Study Boundary

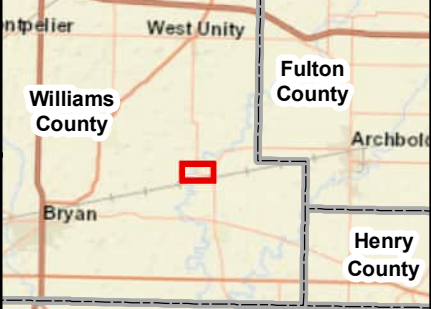
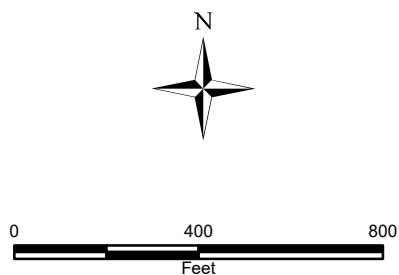
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Legend

-  Existing Structure
-  Proposed West Unity 69 kV Rebuild Transmission Line
-  Ohio USGS 7.5" Topographical Quadrangle
-  County Boundary

NOTES
- USGS Montpelier and West Unity
Quadrangles



American Transmission Systems, Inc.
West Unity 69kV
Transmission Line Rebuild Project
Agency Overview Map



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:

04/15/2025 16:45:11 UTC

Project Code: 2025-0083561

Project Name: West Unity (Stryker) 138 kV Transmission Line Rebuild Project

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, intentional or unintentional, 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>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. 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. 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

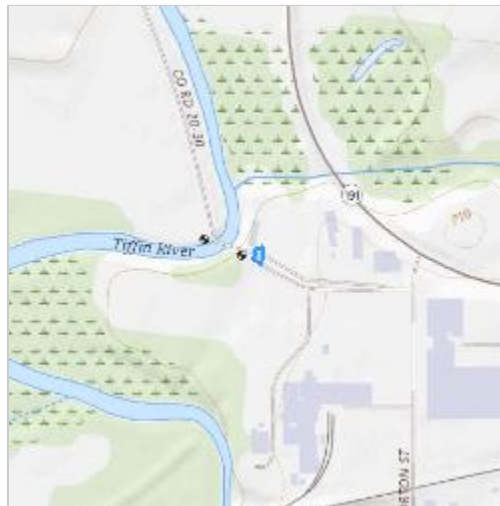
(614) 416-8993

PROJECT SUMMARY

Project Code: 2025-0083561
Project Name: West Unity (Stryker) 138 kV Transmission Line Rebuild Project
Project Type: Transmission Line - Maintenance/Modification - Above Ground
Project Description: The Project includes the replacement of one existing structure located along the existing West Unity 138 kV Transmission line. ATSI anticipates that work activities will only be completed within the existing right-of-way (ROW) for the structures proposed as modification/replacement.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@41.50451315,-84.42932597309664,14z>



Counties: Williams 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 Fisheries¹, 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.

-
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 <i>Myotis sodalis</i> 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
Whooping Crane <i>Grus americana</i> Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non- Essential

REPTILES

NAME	STATUS
Copperbelly Water Snake <i>Nerodia erythrogaster neglecta</i> Population: Indiana north of 40 degrees north latitude, Michigan, Ohio No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7253	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> 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: Private Entity
Name: Brian Bielfelt
Address: 525 Vine Street
Address Line 2: Suite 1800
City: Cincinnati
State: OH
Zip: 45202
Email: brian.bielfelt@aecom.com
Phone: 8505592871

June 18, 2025

Ms. Amy Ruzala
FirstEnergy Corporation
341 White Pond Drive
Akron, OH 44320**Re: Wetland and Waterway Memo
West Unity (Stryker) 138 kV Pole Replacement**

Dear Ms. Ruzala,

AECOM Technical Services, Inc. (AECOM), on behalf of American Transmission Systems, Inc. (ATSI), conduct a wetland and stream delineation within the Project area from August 7-9, 2023. Delineations were conducted within the right-of-way ("ROW"), specifically around of existing structure 1377, a 138 kV wooden pole being replaced within the Springfield Township, Williams County, Ohio as part of the West Unity (Stryker) Project. The approximate coordinates for the structure are 41.504428, -84.429318, respectively. The survey boundary included a 50-foot survey corridor centered along the existing ROW. The proposed study area is approximately 0.18 acres.

During the delineation, AECOM did not identify any wetlands within the study area for the 138 kV pole. Wetlands were found farther north, about 400 feet from the study area (Attachment 2). The work limits do encroach on a regulated flood plain (Tiffin River) based on a review of online FEMA Flood Insurance Rate Mapping.

See the attached delineated resources map and photographic record for further details.

Sincerely,

Brian Bielfelt
Environmental Project Manager
AECOM**Enclosures:**Attachment 1: Photos of Project Site
Attachment 2: Overview Map

Attachment 1: Photos of Project Site

Client Name:

ATSI

Site Location:

West Unity 138kV Pole Replacement Project

Project No.

60696205

PH-1**Date:**

July 2024

Description:

Representative photo
within the Project area
facing Northeast

**PH-2****Date:**

July 2024

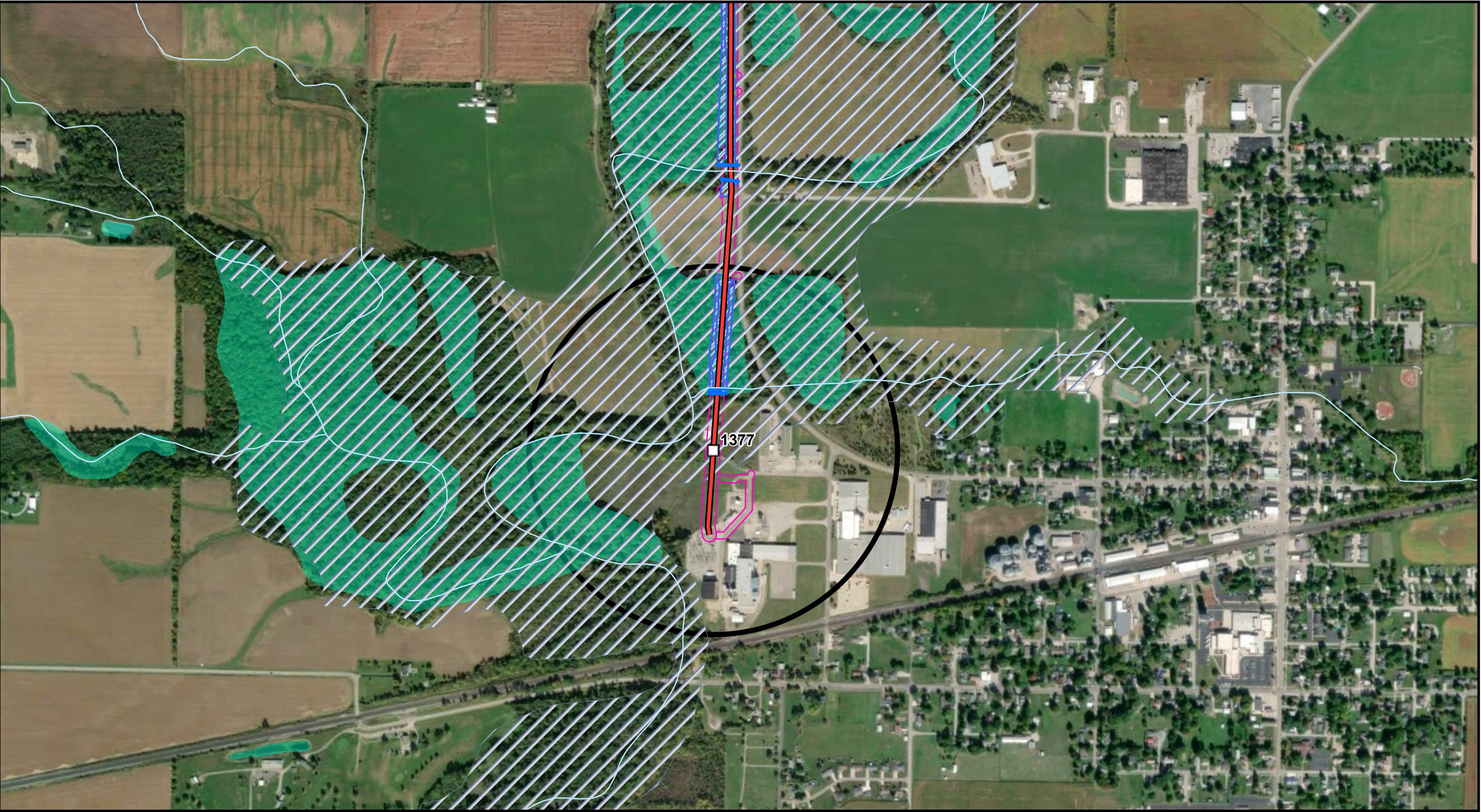
Description:

Representative photo
within the Project area
facing South



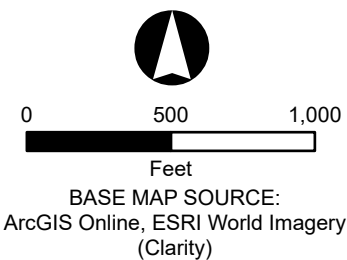
Attachment 2: Overview Map


Date Saved: 6/16/2025
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- LEGEND
- Existing Structure
 - Proposed West Unity 69 kV Rebuild Transmission Line
 - Delineated HHEI Stream
 - Delineated QHEI Stream
 - NWI Wetland

- Upland Drainage Feature
- Delineated Wetlands
- Delineated Pond
- NWI Wetland
- Survey Area
- Quarter Mile Buffer





West Unity 69kV
Transmission Line Rebuild Project

WETLAND AND STREAM RESOURCES
ASSESSMENT MAP

JOB NO. 60696205