

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

CONSTRUCTION NOTICE

FIRESTONE SUBSTATION EXPANSION PROJECT

Case No.: 25-0278-EL-BNR

May 23, 2025

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

CONSTRUCTION NOTICE FIRESTONE SUBSTATION 138 kV EXPANSION PROJECT

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 (B)(1): Name and Reference Number

Name of Project:	Firestone Substation 138 kV Expansion (“Project”)
Reference Number:	3003

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, is proposing to expand the existing Firestone Substation to accommodate a new Package Control Enclosure (“PCE”). To facilitate this, the substation will expand from its existing square footage of approximately 31,481 square feet to approximately 35,625 square feet. This will result in an approximate 13 percent increase in square footage.

The Project is located in the city of Akron, Summit County, Ohio. The general location of the proposed Project is shown in Exhibits 1 and 2. Exhibit 1 is a partial copy of a United States Geologic Survey, Summit County, Ohio Quad Map. Exhibit 2 is a copy of ESRI aerial imagery of the Project area. The general layout of the Project is shown in Exhibit 3.

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

The Project meets the requirements for a Construction Notice application because the Project is within the types of projects defined by Item (4)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm. Code 4906-1-01. This item states:

(4) *Constructing additions to existing electric power transmission stations or converting distribution stations to transmission stations where:*

(a) There is a twenty percent or less expansion of the fenced area.

The proposed Project is within the requirements of Item (4)(a) as it involves expansion of the Firestone Substation by an amount less than 20 percent of the existing fenced area.

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

The Firestone Substation requires a 13 percent expansion to accommodate a new PCE. Currently, there are space constraints in the existing PCE as it houses both ATSI-owned control equipment and distribution equipment owned by Bridgestone. The result of this arrangement is very limited, tight clearances between the door and relay panels. Given this situation, there is little to no space to expand any of the existing relay panels. In addition, there is a need to physically separate the ATSI owned-control equipment and the Firestone Distribution Substation-owned control equipment for security reasons. Lastly, a physical separation allows for ATSI to safely work and maintain equipment away from the customer-owned station service voltage transformers (“SSVTs”).

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 Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. The Project is not included in ATSI's LTFR filed in 2025 because the Project does not entail any topology or rating change. 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 other alternative considered was taking no action. This was not a viable option as the safety and security concerns of the PCE limits the potential for ATSI to maintain, work on, and expand its control equipment. This alternative was not chosen because of the need for interruption of the service to the customer to perform any maintenance on the 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 Construction Notice, along with other Project information, on FirstEnergy's website:

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

During all phases of this Project, the public may contact ATSI through the transmission projects hotline at 1-888-311-4737 or via email at:

transmissionprojects@firstenergycorp.com.

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

The construction schedule for this Project is expected to begin as early as August 22, 2025, and to be completed by February 13, 2026.

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

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

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

The Project is located entirely within existing right-of-way on parcel 6763188. 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 equipment and facilities described below are associated with the substation component of the proposed Project:

Structures: One (1) 138 kV Package Control Enclosure

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

As this is a substation expansion project and there is no transmission line work, 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 \$8,051,000. Although not statutorily required for approval, at the request of OPSB Staff, ATSI confirms that ATSI’s costs will be captured and allocated via FERC formula rates for the ATSI Transmission Zone, Attachment H-21 in the PJM OATT.

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

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

The Project is in the City of Akron, Summit County, Ohio. The Project area is in commercial/industrial zoned land and is an expansion of an existing substation. No significant changes or impacts to the current or future land use are anticipated.

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

Agricultural land does not exist within the Project's Area.

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

As part of the investigation for this Construction Notice, TRC Companies, Inc. ("TRC") requested database information from the Ohio Historic Preservation Office's ("SHPO") on February 21, 2025, to identify the presence of previously recorded significant historic properties, including above-ground historic resources and/or archeological sites, mapped within one (1)-mile of the Project Study Area (Area of Potential Effect or APE). On March 21, 2025, SHPO replied to the request, attached as Exhibit 4.

The SHPO database includes a catalog of all historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. There is one (1) NRHP-listed resource, the Firestone Tire and Rubber Company (Ref No.: 14000338), located 0.24 mile north of the Project Study Area. There are 11 above-ground historic resources with SHPO determinations of eligibility within one (1)-mile. Of these, 10 have been recommended as potentially eligible, while one (1) resource has been recommended as not eligible. The nearest of the eligible resources is located 0.37 mile south of the Project Study Area. There are also 27 additional resources that have been recorded, but not yet assessed for NRHP eligibility located within one (1)-mile. The nearest of the unevaluated resources is located 0.18 mile east. In addition, there is one (1) Ohio Genealogical Society (OGS) cemetery recorded 0.26-mile northeast of the northern Project extent.

Two (2) archaeological surveys have been conducted within one (1)-mile of the proposed Project. There have been no archaeological sites recorded within one (1)-mile of the proposed Project. The nearest documented archaeological site is situated 1.75 mile to the northeast.

All work will be performed within the existing substation and immediate adjacent disturbed industrial land.. The proposed Project is not expected to have any adverse effects on known historic properties.

SHPO's findings state that there will be no effect on historic resources as a result of the project. No cultural resource studies are warranted for the project. 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.

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

If an overweight hauling permit is required for this Project, coordination with the City of Akron will be initiated to confirm the need for any special hauling permits and/or Road Use Maintenance Agreements ("RUMA"). Less than one (1) acre of earth disturbance is proposed based on review of the preliminary construction plans. Therefore, the submittal of a Notice of Intent application with the Ohio EPA is not required for coverage under the general construction stormwater permit (OHC000006). Likewise, a Storm Water Pollution Prevention Plan ("SWPPP") is also not required to be submitted for review by the City of Akron and Summit County Soil and Water Conservation District ("SWCD"). The Project as proposed is not located within a 100-year floodplain; therefore, coordination is not required with the local floodplain administrator. All permitting and/or coordination necessary to comply with local, state, and federal agencies with jurisdiction regarding this Project will be completed prior to the commencement of construction.

Table 1. List of Government Agency Requirements

City of Akron	Special Hauling Permit and Road Use Maintenance Agreement (RUMA) (Coordination)
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4906-6-05 (B)(10)(e): Endangered, Threatened, Rare and Designated Species Investigation

As part of the investigation, ATSI retained TRC to conduct the necessary surveys. TRC 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 (“DOW”) Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. The ODNR’s Office of Real Estate’s response on March 20, 2025, indicated that there are seven (7) records of state and/or federally listed species and/or unique ecological features located within a one-mile radius of the Project Study Area and is provided in Table 2. Additionally, the Project is within the range of seven (7) state and/or federally listed animal species. A list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in Table 3. A copy of ODNR’s Office of Real Estate’s response is included as Exhibit 5.

The response from ODNR, DOW indicated the Project is within the range of the federally and state endangered Indiana bat, the federally endangered and state endangered northern long-eared bat, the state endangered little brown bat, and the state endangered tricolored bat. These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, and cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost trees. Currently as proposed, no tree clearing is anticipated within the Project Study Area. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed for ATSI and submitted to ODNR for concurrence on March 28, 2025. ODNR responded on March 31, 2025 (Exhibit 6),

concurring that no caves, cliffs, or mine openings occur in the Project Area. Additionally, because the Project does not involve impacting the bedrock, ODNR stated the Project is not likely to impact hibernating bats that may be present in the nearby underground mines. Based on ODNR's concurrence and that no tree clearing is anticipated, the proposed Project is not likely to impact these species.

The response from ODNR, DOW also indicated that the Project is within the range of the smooth greensnake (*Opheodrys vernalis*), and the spotted turtle (*Clemmys guttata*). Due to the location, the type of habitat within the Project Study Area, and the type of work proposed, this Project is not likely to impact these species.

The response from ODNR, DOW also indicated that the Project is within the range of the western banded killifish (*Fundulus diaphanatus menona*), the Iowa darter (*Etheostoma exile*), the least darter (*Etheostoma microperca*), the pugnose minnow (*Opsopoeodus emiliae*), the lake chubsucker (*Erimyzon sucetta*), and the paddlefish (*Polyodon spathula*). Since no in-water work is proposed in a perennial stream, the Project will not impact these or other aquatic species.

As part of the investigation, TRC also submitted a request to the US 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 March 6, 2025, is included as Exhibit 7. The response indicated that due to the Project type, size, and location no adverse effects are anticipated to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat.

Table 2. List of Endangered and Threatened Species within a 1-mile radius of Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Fish				
Western Banded Killifish	<i>Fundulus diaphanatus menona</i>	N/A	Endangered	Perennial streams.
Iowa Darter	<i>Etheostoma exile</i>	N/A	Endangered	Perennial streams.
Lake Chubsucker	<i>Erimyzon sucetta</i>	N/A	Threatened	Perennial streams.
Least Darter	<i>Etheostoma microperca</i>	N/A	Species of Concern	Perennial streams.
Blackchin Shiner	<i>Notropis heterodon</i>	N/A	Presumed Extirpated	Perennial streams.
Blacknose Shiner	<i>Notropis heterolepis</i>	N/A	Endangered	Perennial streams.
Communities				
Great Blue Heron Rookery	N/A	N/A	N/A	Freshwater and brackish marshes near waterbodies, open fields or meadows.

Table 3. 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, forests, caves, and caverns.
Little Brown Bat	<i>Myotis lucifugus</i>	N/A	Endangered	Trees, forests, caves, and caverns.
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored Bat	<i>Perimyotis subflavus</i>	N/A	Endangered	Trees, forests, caves, and caverns.
Reptiles				
Smooth Greensnake	<i>Opheodrys vernalis</i>	N/A	Endangered	Prairie, marshy meadows and roadside ditches.
Spotted Turtle	<i>Clemmys guttata</i>	N/A	Threatened	Fens, bogs and marshes, wet prairies, meadows, wet woods and pond edges.
Fish				

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Western Banded Killifish	<i>Fundulus diaphanatus menona</i>	N/A	Endangered	Perennial streams.
Iowa Darter	<i>Etheostoma exile</i>	N/A	Endangered	Perennial streams.
Pugnose Minnow	<i>Opsopoeodus emiliae</i>	N/A	Endangered	Perennial streams.
Lake Chubsucker	<i>Erimyzon sucetta</i>	N/A	Threatened	Perennial streams.
Paddlefish	<i>Polyodon spathula</i>	N/A	Threatened	Perennial streams.

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

TRC conducted a wetland and stream delineation of the Project area on February 7, 2024, as a part of the recommended hibernaculum habitat assessment. During the field investigation, no streams or wetlands were identified in the Project area. Mapping and a photographic record can be found in Exhibit 8.

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 Application Transmittal and Availability for Public Review

This Construction Notice application is being provided concurrently with its docketing with the Board to the following officials:

Summit County

Rita Darrow
Council President
175 S. Main Street, Suite #700
Akron, OH 44308
rdarrow@summitoh.net

B. Alan Brubaker
Summit County Engineer
538 East South Street
Akron, OH 44311
abrubaker@summitengineer.net

Erin Dickinson
Council Vice President
175 S. Main Street, Suite #700
Akron, OH 44308
edickinson@summitoh.net

Brian Prunty
SWCD Administrator
1180 S. Main Street, Suite #230
Akron, OH 44301
bprunty@summitoh.net

Christine Wiedie Higham
Council Member - District 6
175 S. Main Street, Suite #700
Akron, OH 44308
chigham@summitoh.net

Dennis Tubbs
Assistant Director, Planning Commission
175 S. Main Street, Suite #103
Akron, OH 44308
dtubbs@summitoh.net

City of Akron

Shammas Malik
Mayor of Akron
166 S High Street, Suite #200
Akron, OH 44308
mayor@akronohio.gov

Jeff Fusco
Vice President, Akron City Council
166 S High Street, Room #301
Akron, OH 44308
atlargel@akronohio.gov

Margo Sommerville
President, Akron City Council
166 S High Street, Room #301
Akron, OH 44308
ward3@akronohio.gov

Brad McKittrick
Ward 6 Council Representative
166 S High Street, Room #301
Akron, OH 44308
ward6@akronohio.gov

Kyle Julien
Planning Director
166 S High Street
Akron, OH 44308
kjulien@akron.gov

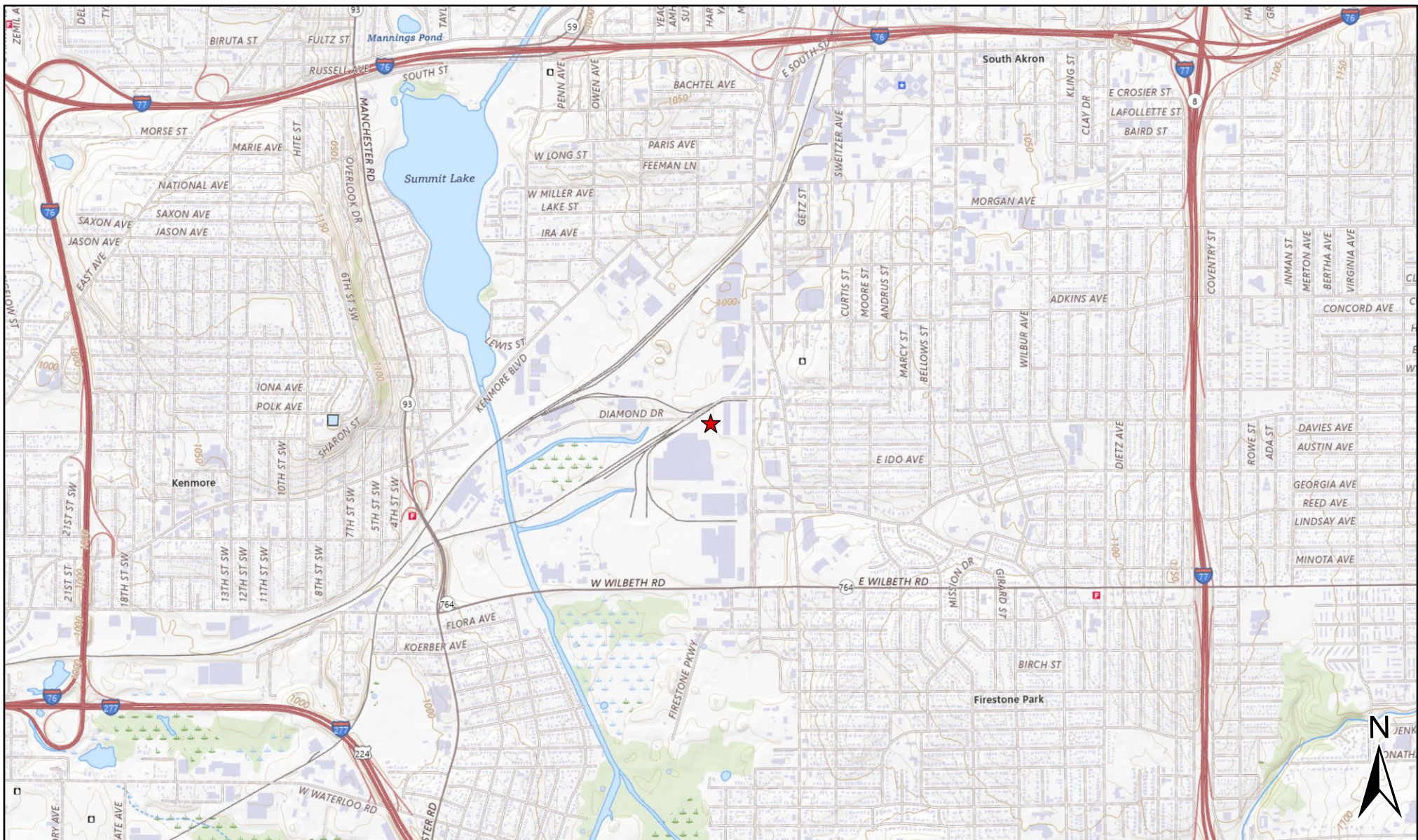
Travis L. Capper
City Engineer
166 S. High Street, Room #701
Akron, OH 44308
AkronEngineering@akronohio.gov

Library

Sylvia Chris
Manager Firestone Park Branch Library
1486 Aster Avenue
Akron, Ohio 44301

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

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



Legend

★ Project Location



0 1,000 2,000 4,000
Feet

Reference Scale: 1:24,000

References:

ESRI Aerial Imagery, USGS National Map, ODOT

Coordinate System:

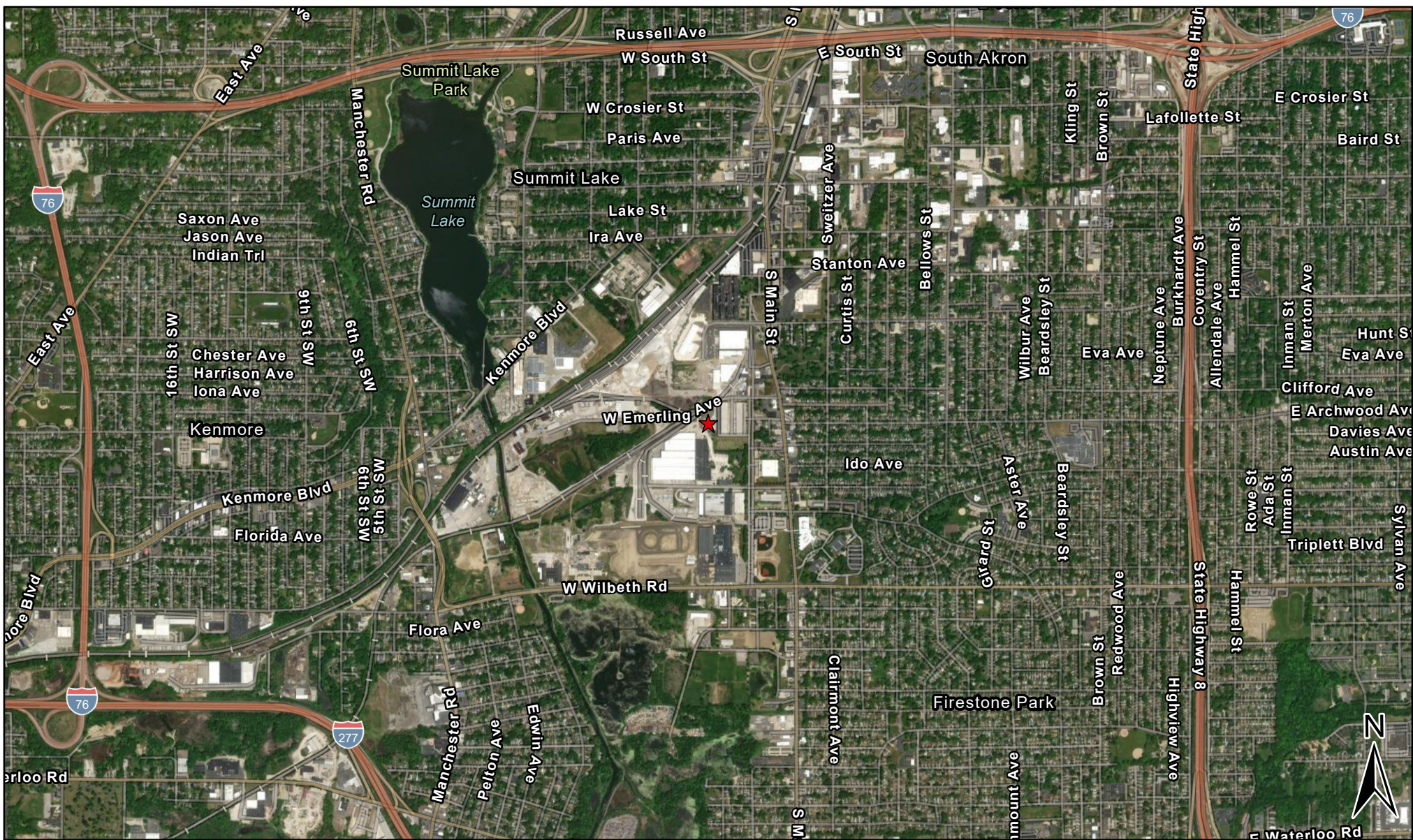
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ATSI®

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

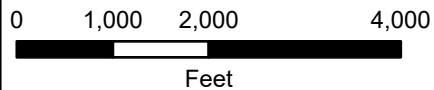
Firestone 138kV Substation
Expansion Project

EXHIBIT 1



Legend

★ Project Location



Reference Scale: 1:24,000

References:

ESRI Aerial Imagery, USGS National Map, ODOT

Coordinate System:

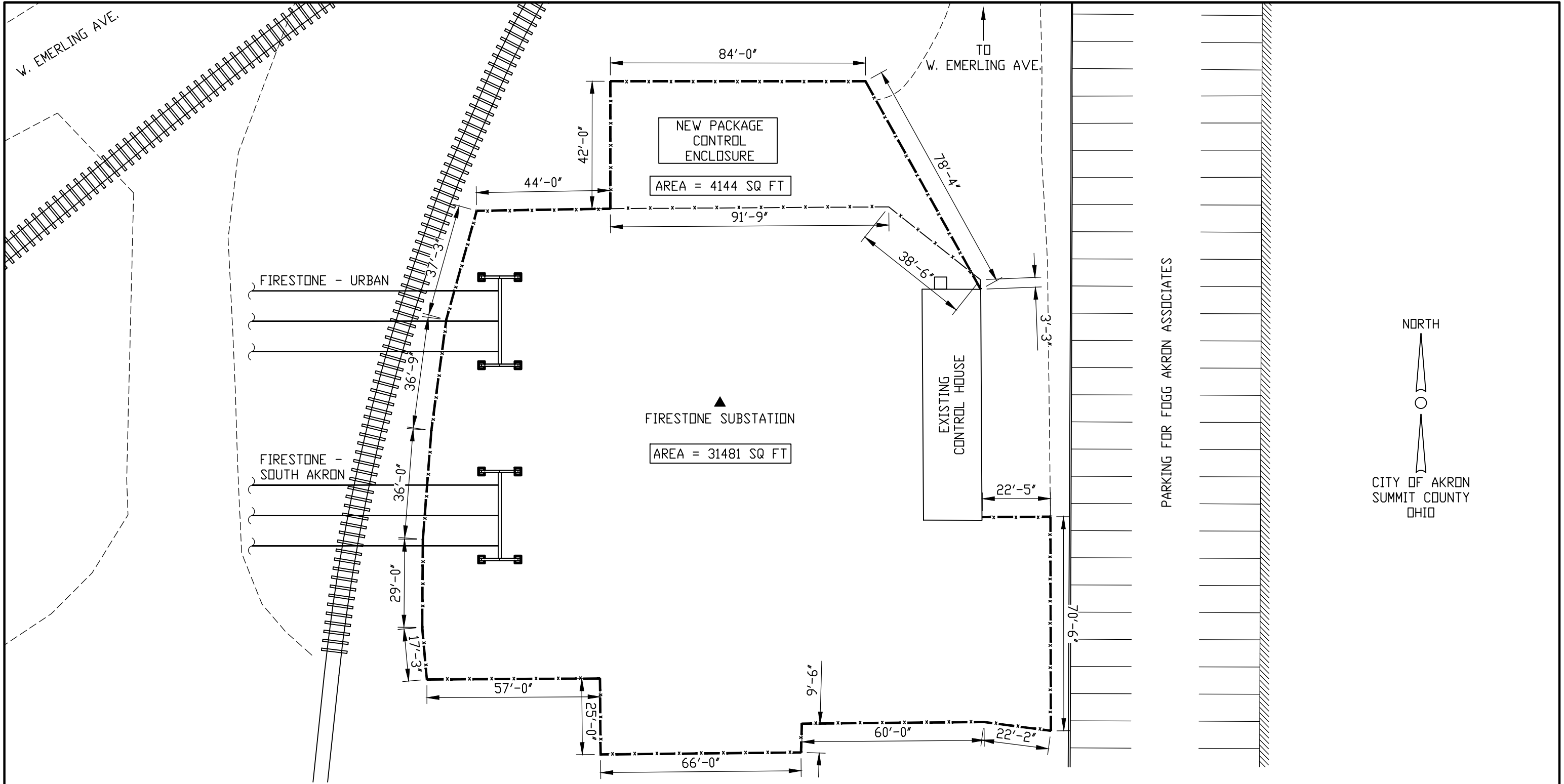
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American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

Firestone 138kV Substation
Expansion Project

EXHIBIT 2



LEGEND			
▲	EXISTING SUBSTATION	————	EXISTING CONDUCTOR
-x-x-x-x-	EXISTING SUBSTATION FENCE LINE	////	EXISTING NEARBY BUSINESS
-x-x-x-x-	PROPOSED SUBSTATION EXPANSION AND REPLACEMENT FENCE LINE		RAILROAD
- - - - -	EXISTING ROADWAY		

BY: JJB	 <i>American Transmission Systems, Inc.</i> <small>a subsidiary of FirstEnergy Corp.</small>	DIST. CODE:	OPERATING COMPANY	REGION	AREA
APP: PJG			OHIO EDISON [OE]	OH-CE	AKRON
DATE: 04-02-2025		SCALE: 1/16"=1'-0"	FACILITY		
ISSUE: CONSTRUCTION		SIZE: 17x11	FIRESTONE		
(GPD)			TITLE		
			GENERAL LAYOUT		
			SAP NO.	EXHIBIT 3	DOC. ID
RevisionNote			17756073	SK-1	-

RevisionNote



In reply, refer to
2025-SUM-64148

March 21, 2025

Justin D. McKissick
TRC Environmental Corporation
317 E. Carson Street, Ste. 113
Pittsburgh, PA 15219
jmckissick@trccompanies.com

RE: Firestone Project, City of Akron, Summit County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received February 21, 2025, regarding the proposed Firestone Project located in the City of Akron, Summit County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The project proposes to expand the existing Firestone Substation, which is located near the intersection of Diamond Drive and Firestone Parkway. Per the submission, the existing substation was built in the mid- to late twentieth century and the proposed changes include the installation of a new control building and substation equipment. The Area of Potential Effect (APE) is the 0.53-acre area shown in yellow on Figure 1 of the submission. A review of our records indicates that the area has not been previously professionally surveyed and there are no documented archaeological sites located within or adjacent to the APE. A review of historic aerials showed extensive disturbance within the APE since the mid-twentieth century due to several periods of construction and demolition. It is unlikely that intact archaeological sites will be impacted by the project and no archaeological survey is necessary. The submission's desktop review identified eleven (11) above-ground SHPO determinations of eligibility, one (1) National Register of Historic Places (NRHP)-listed property, twenty-seven (27) Ohio Historic Resource properties, and one (1) Ohio Genealogical Society (OGS) Cemetery in the study area. It is TRC's recommendation that there will be no effect to historic properties due the proposed infrastructure's similar height and design to the existing substation to the south. The SHPO agrees with this finding.

Based on the information provided, it is our office's opinion that the project, as proposed, will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during the implementation of this project. In such a situation, this office should be contacted. If you have any questions, please contact me by e-mail at cgullett@ohiohistory.org, or Ms. Abigail Rosenow at arosenow@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Gullett".

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

RPR Serial No. 1107563



Office of Real Estate & Land Management

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

March 20, 2025

Jenna Slabe
TRC Companies, Inc.
1382 West 9th Street, Suite 400
Cleveland, Ohio 44113

Re: 25-0320 - Firestone Substation Expansion

Project: The proposed project involves the expansion of the existing Firestone Substation to allow for the installation of a new control building and substation equipment.

Location: The proposed project is located in Coventry, Summit County, Ohio.

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

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

Lake Chubsucker (*Erimyzon sucetta*), T
Iowa Darter (*Etheostoma exile*), E
Least Darter (*Etheostoma microperca*), SC
Western Banded Killifish (*Fundulus diaphanus menona*), E
Blackchin Shiner (*Notropis heterodon*), X
Blacknose Shiner (*Notropis heterolepis*), E
Great Blue Heron Rookery

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

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

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

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

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

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 Iowa darter (*Etheostoma exile*), a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, the lake chubsucker (*Erimyzon sucetta*), a state threatened fish, and the paddlefish (*Polyodon spathula*) a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 to 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 smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant but also found in marshy meadows and roadside ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type

of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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.*

From: Eileen.Wyza@dnr.ohio.gov
To: [Slabe, Jenna](#)
Cc: [Molnar, Maggie](#); [Falkinburg, Brad](#)
Subject: RE: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Firestone Substation Expansion Project
Date: Monday, March 31, 2025 9:24:02 AM
Attachments: [image002.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image001.png](#)
[image003.png](#)

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Hello Jenna,

Per review of the desktop survey provided for FirstEnergy's Firestone Substation Expansion 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 impacting the bedrock, the project is not likely to impact hibernating bats that may be present in the nearby underground mines.

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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From: Slabe, Jenna <JSlabe@trccompanies.com>
Sent: Monday, March 31, 2025 9:19 AM
To: Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>
Cc: Molnar, Maggie <MMolnar@trccompanies.com>; Falkinburg, Brad <BFalkinburg@trccompanies.com>
Subject: RE: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Firestone Substation Expansion Project

Good morning Eileen,

Subsurface disturbance may be required during the construction of the Project; however, bedrock will not be impacted. If bedrock is met, no disturbance to the bedrock will be required.

Let us know if you have any other questions, thank you!

Jenna Slabe
Ecologist
Planning, Permitting, and Licensing



1382 W 9th St, Suite 400, Cleveland, OH 44113
C 330.998.0481
[LinkedIn](#) | [TRCcompanies.com](https://www.trccompanies.com)

From: Eileen.Wyza@dnr.ohio.gov <Eileen.Wyza@dnr.ohio.gov>
Sent: Monday, March 31, 2025 8:28 AM
To: Slabe, Jenna <JSlabe@trccompanies.com>
Cc: Molnar, Maggie <MMolnar@trccompanies.com>; Falkinburg, Brad <BFalkinburg@trccompanies.com>
Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Firestone Substation Expansion Project

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Hi Jenna,

Is there subsurface disturbance planned for this project? Particularly any that may impact bedrock?

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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From: Slabe, Jenna <JSlabe@trccompanies.com>

Sent: Friday, March 28, 2025 5:56 PM

To: Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>

Cc: Molnar, Maggie <MMolnar@trccompanies.com>; Falkinburg, Brad <BFalkinburg@trccompanies.com>

Subject: Desktop Hibernacula Assessment: FirstEnergy's Firestone Substation Expansion Project

Eileen,

In response to ODNR's DOW recommendations (attached), TRC completed a desktop hibernacula assessment to determine if potential hibernaculum is present within FirstEnergy's proposed Firestone Substation Expansion Project located in the City of Akron, Summit County, Ohio.

Please let us know if you have any questions on the provided desktop assessment or require any additional information, thank you!

Jenna Slabe

Ecologist

Planning, Permitting, and Licensing



1382 W 9th St, Suite 400, Cleveland, OH 44113

☎ 330.998.0481

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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



March 6, 2025

Project Code: 2025-0057511

Dear Ms. Slabe:

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,

Erin Knoll
Field Office Supervisor

Client Name: FirstEnergy Corporation	Site Location: City of Akron, Summit County, Ohio	Project No. 429847.0121.0000
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Photo No. 1.

Photo Date:
2/7/2024

Description:

Representative photo of the Project Study Area, facing southeast.



Photo No. 2.

Photo Date:
2/7/2024

Description:

Representative photo of the Project Study Area, facing east.



Client Name: FirstEnergy Corporation	Site Location: City of Akron, Summit County, Ohio	Project No. 429847.0121.0000
--	---	--

Photo No. 3.
Photo Date: 2/7/2024
Description: Representative photo of the Project Study Area, facing south.



Photo No. 4.
Photo Date: 2/7/2024
Description: Representative photo of the Project Study Area, facing west.

