

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

**CONSTRUCTION NOTICE**

**REPUBLIC ARC-REPUBLIC VINE 138 KV  
TRANSMISSION LINE  
SWITCH STRUCTURE INSTALLATION PROJECT  
OPSB CASE NO.: 25-0072-EL-BNR**

**April 28, 2025**

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

**CONSTRUCTION NOTICE**  
**REPUBLIC ARC-REPUBLIC VINE 138 kV TRANSMISSION LINE**  
**SWITCH STRUCTURE INSTALLATION 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. Pursuant to Adm.Code 4906-6-03(B), for good cause shown, ATSI requests expedited approval of the Project.

**4906-6-05: ACCELERATED APPLICATION REQUIREMENTS**

**4906-6-05: Name and Reference Number**

Name of Project: Republic Arc-Republic Vine 138 kV Transmission Line  
Switch Structure Installation Project (“Project”)

Reference Number: 3213

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

American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to install a new 1200A Quick Break Whips with SCADA Control switch and new mid-span switch Structure No. 13277 on the existing Republic Arc-Republic Vine 138 kV Transmission Line. The new structure is an approximately 69’ tall steel monopole switch structure on a concrete foundation. The Project is located in the city of Lorain, Lorain County, Ohio.

The general location of the proposed Project is shown in Exhibit 1, a partial copy of a United States Geologic Survey (“USGS”) Topographic Map, Lorain County, Ohio Quad Map. Exhibit 2 is a partial copy of ESRI aerial imagery. 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)(a) 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) two miles or less*

The proposed Project is within the requirements of Item (2)(a) as it involves installing a new mid-span switch structure.

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

The Project is proposed to cut open the Republic Arc-Republic Vine 138 kV Transmission Line and install a normally open 1200A Quick Break Whips with SCADA Control switch. The existing Black River-Republic Arc 138 kV Transmission Line and Black River-Republic Vine 138 kV Transmission Line are networked through Republic Vine and Republic Arc Substations, which are customer owned substations located in Lorain County, Ohio. Since the customer substations are currently in the transmission network path, transmission flow through customer owned equipment is possible. In addition, Republic Arc Substation has minimal load, and the plant is not operational due to previous fire damage. Republic Vine Substation is operational, but loads are lower than historical levels. The existing configuration introduces risks to the transmission system due to network flows through both customer substations.

ATSI has proposed that the normally open switch on the Republic Arc-Republic Vine 138 kV Transmission Line is warranted to reconfigure Republic Vine and Republic Arc

Substations to radial lines from FirstEnergy's Black River Substation. The proposed configuration is designed to enhance system reliability and performance and reduce risks to the transmission system and customers. The switch and switch structure will be owned and operated by ATSI.

The Project need was presented as a Supplemental Project at the PJM Subregional RTEP-Western Committee meeting on March 15, 2024. The proposed solution was presented at the Subregional RTEP-Western Committee meeting on April 19, 2024. PJM evaluated the proposed Project and did not identify any ATSI or PJM Planning Criteria violations caused by the Project. Upon completion of the Attachment M-3 process, PJM assigned the Project supplemental upgrade identification number s3455.1. The PJM SSRTEP-Western meeting presentation slides are included as Exhibit 4.

**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 included in ATSI's LTFR filed in 2025 on Page 93. The general location and layout of the Project area is shown in Exhibits 1 and 2.

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

The alternative to the proposed solution is to continue operating the system with the existing configuration and risk to the transmission system and customers.

**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](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](mailto:transmissionprojects@firstenergycorp.com) where the public may ask questions or leave comments on the Project for ATSI.

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

The construction schedule for this Project is expected to begin as early as June 23, 2025, and to be completed by October 30, 2025.

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

Exhibit 1 provides a partial copy of the USGS Topographic Map, Lorain County, Ohio Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery of the Project area.

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

The Project is located entirely within existing right-of-way on Parcel No. 0300088101015 owned by Republic Engineered Products, Inc., within an existing easement. 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:	795 kcmil 26/7 ACSR (Existing) and 605 kcmil 24/7 ACSR (Existing)
Static Wire:	7#8 Alumoweld (Existing) and 136.4 kcmil 12/7 (Existing)
Insulators:	Porcelain/Glass
ROW Width:	100'
Structure Types:	Exhibit 5: Steel Pole Switch Structure on Concrete Foundation (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 \$467,000. 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 Lorain, Lorain County, Ohio. The Project area is in industrial zoned land. No significant changes or impacts to the current or future land use are anticipated.

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

Agricultural land doesn’t exist within the Project’s Area of Potential Effect (“APE”).

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

As part of the investigation for this Construction Notice, on February 18, 2025, TRC Companies, Inc. (‘TRC’) 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 March 18, 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 three NRHP- listed above-ground resources, one NRHP listed historic district, and 20 NRHP-eligible above-ground historic resources. There are 300 above-ground historic resources that have not been formally evaluated for NRHP eligibility within 1.0 mile of the APE.

No OGS Cemeteries were identified within 1.0 miles of the Project’s APE. Within 1.0 mile of the Project’s APE, two previously archaeological surveys have been conducted, there are eight OAI sites, seven of these sites are pre-contact and one site is twentieth century historic, and three sites are multi-component pre-contact and historic archaeological sites. No impacts to any culturally significant resources are expected.

The Project will not impact the viewshed of any potential historic properties. Additionally, due to prior anthropogenic disturbances, the Project has a low potential to encounter intact, significant archaeological resources. The Project will have no adverse effect upon any cultural or archaeological resources. The Project ground disturbance is limited to a single structure installation.

#### **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 TRC to conduct 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

Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project Study Area. The ODNR's Office of Real Estate's response on February 21, 2025, stated that within one mile of the Project area there is a Great Blue Heron Rookery. This feature is outside of the Project Area and will not be affected by the switch installation. A copy of ODNR's Office of Real Estate's response is included as Exhibit 7.

In addition, the ODNR-DOW stated that the Project is within the vicinity of records for the Indiana bat (*Myotis sodalis*; State Endangered and Federally Endangered), the Northern long-eared bat (*Myotis septentrionalis*; State Endangered and Federally Endangered), and the tri-colored bat (*Perimyotis subflavus*; State Endangered). The entire state of Ohio is also within the range of the little brown bat (*Myotis lucifugus*; State Endangered). An on-site field assessment was performed by TRC on February 14, 2025. Field observations did not identify suitable habitat for these species identified in the immediate vicinity of the Project 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 February 28, 2025. ODNR responded on March 4, 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.

No tree removal is necessary to complete this Project; therefore, this Project will not impact any tree-dwelling species.

The ODNR-DOW also identified the Project is within the range of the following aquatic species; pondhorn (*Uniomerus tetralasmus*; State Threatened), lake sturgeon (*Acipenser fulvescens*; State Endangered), Ohio lamprey (*Ichthyomyzon bdellium*; State Endangered), spotted gar (*Lepisosteus oculatus*; State Endangered), American eel (*Anguilla rostrata*, State Threatened), bigmouth shiner (*Notropis dorsalis*, State Threatened), and the channel darter (*Percina copelandi*, State Threatened). The Project is also in the range of the Blanding's turtle (*Emydoidea blandingii*, State Threatened),

spotted turtle (*Clemmys guttata*, State Threatened), and sandhill crane (*Antigone canadensis*, State Threatened). The ODNR does not believe the project will impact any listed species.

As part of the investigation, TRC also submitted a request to the U.S. Fish and Wildlife Service (“USFWS”) for an Ecological Review within one (1) mile of the Project area on January 24, 2025. A response was received from USFWS on January 27, 2025, and is included as Exhibit 8. The response states that due to the Project, type, size, and location, no adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat are anticipated.

The Project work limits will be entirely within the maintained transmission line corridor. Moreover, no trees will be cleared as a result of the Project. As such, the Project is not anticipated to adversely impact any state or federally listed species.

A list of all endangered, threatened, and rare species, as identified by ODNR and USFWS, is provided in Table 1.

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

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Preferred Habitat	Suitable Habitat Present within Study Area
Indiana Bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees & Forest	No
Northern Long-Eared Bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees & Forest	No
Little Brown Bat	<i>Myotis lucifugus</i>	NA	Endangered	Trees & Forest	No
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Endangered	Trees & Forest	No
Pondhorn	<i>Uniomerus tetralasmus</i>	NA	Threatened	Perennial Streams	No
Lake Sturgeon	<i>Acipenser fulvescens</i>	NA	Endangered	Rivers and Lakes	No

Ohio Lamprey	<i>Ichthyomyzon bdellium</i>	NA	Endangered	Rivers and Lakes	No
Spotted Gar	<i>Lepisosteus occultus</i>	NA	Endangered	Rivers and Lakes	No
American Eel	<i>Anguilla rostrata</i>	NA	Threatened	Rivers and Lakes	No
Bigmouth Shiner	<i>Notropis dorsalis</i>	NA	Threatened	Perennial Streams	No
Channel Darter	<i>Epiplatys triquetra</i>	NA	Threatened	Perennial Streams	No
Blanding's Turtle	<i>Emydoidea blandingii</i>	NA	Threatened	Wetlands	No
Spotted Turtle	<i>Clemmys guttata</i>	NA	Threatened	Wetlands	No
Sandmill Crane	<i>Antigone canadensis</i>	NA	Threatened	Wetlands	No

The Project work limits do not include any in-stream activities or encroach on any regulated flood plains based on a review of online FEMA Flood Insurance Rate Mapping.

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

TRC conducted a wetland and stream delineation for the Project, as shown in Exhibit 9. The Project Study Area is approximately 1.7-acres located in the city of Lorain, Lorain County, Ohio. No aquatic resources were identified within or adjacent to the Project area during the wetland delineation.

As part of the Environmental Review, the ODNR Office of Real Estate researched the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. No protected sites or public properties were identified.



The switch structure and foundation will be placed along developed ROW associated with the Republic Arc-Republic Vine 138 kV Transmission Line. Notification to the U.S. Army Corps of Engineers (USACE) is not required as no impacts to any Waters of the United States are proposed. Reasonable best-management practices will be used to ensure debris or sediment does not leave the Project site that could potentially impact nearby waterways.

The Project work limits do not include any in-stream activities or encroach on any regulated flood plains based on a review of online FEMA Flood Insurance Rate Mapping.

**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 the city of Lorain, Lorain County, Ohio:

**Lorain County**

Mr. Jeff Riddell, President  
Lorain County Board of  
Commissioners  
226 Middle Avenue 4th Floor  
Elyria, OH 44035  
[jriddell@loraincounty.us](mailto:jriddell@loraincounty.us)

Mr. David J. Moore, Vice President  
Lorain County Board of  
Commissioners  
226 Middle Avenue 4th Floor  
Elyria, OH 44035  
[dmoore@loraincounty.us](mailto:dmoore@loraincounty.us)

Ms. Michelle Hung, Member  
Lorain County Board of  
Commissioners  
226 Middle Avenue 4th Floor  
Elyria, OH 44035  
[mhung@loraincounty.us](mailto:mhung@loraincounty.us)

Ms. Christin Brandon, Coordinator  
Lorain County Planning Commission  
Lorain County Administration Bldg.  
226 Middle Avenue, Fourth Floor  
Elyria, OH 44035  
[cbrandon@loraincounty.us](mailto:cbrandon@loraincounty.us)

Mr. Ken Carney, P.E., P.S.,  
Lorain County Engineer  
247 Hadaway St.  
Elyria, OH 44035  
[kcarney@loraincountyengineer.com](mailto:kcarney@loraincountyengineer.com)

### **City of Lorain**

Mr. Jack Bradley  
Mayor, City of Lorain  
Lorain City Hall  
200 West Erie Avenue - 7th Floor  
Lorain, OH 44052  
[Jack\\_Bradley@CityofLorain.org](mailto:Jack_Bradley@CityofLorain.org)

Mr. Dale Vandersommen, P.E.  
Engineer, City of Lorain  
Lorain City Hall  
200 West Erie Avenue - 4th Floor  
Lorain, OH 44052  
[dale\\_vandersommen@cityoflorain.org](mailto:dale_vandersommen@cityoflorain.org)

Mr. Joel Arredondo  
President of Council, City of Lorain  
Lorain City Hall  
200 West Erie Avenue  
Lorain, OH 44052  
[Joel.arredondo47@gmail.com](mailto:Joel.arredondo47@gmail.com)

Ms. Terri Soto, Treasurer  
City of Lorain  
605 W 4th Street  
Lorain, OH 44052  
[terri\\_soto@cityoflorain.org](mailto:terri_soto@cityoflorain.org)

### **Library**

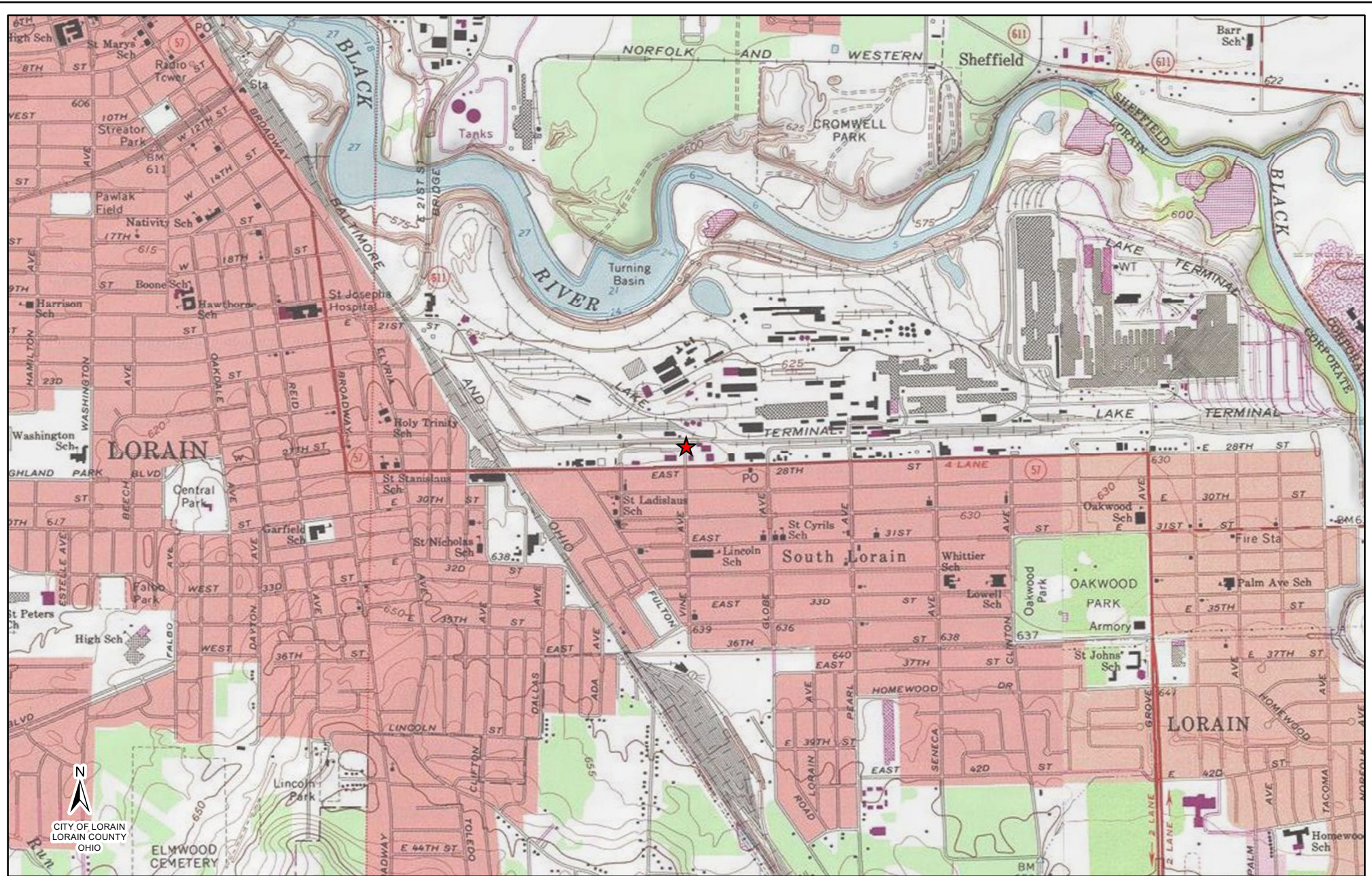
Ms. Anastasia Diamond-Ortiz, Director  
Lorain County Main Library  
351 West 6th Street  
Lorain, OH 44052  
[notifications.lpls@gmail.com](mailto:notifications.lpls@gmail.com)

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](http://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  
CITY OF LORAIN  
LORAIN COUNTY  
OHIO

0 1,000 2,000 4,000  
Feet

**Reference:**

USGS Topographical Overlay

**Coordinate System:**

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



**EXHIBIT 1**

**ATSI**<sup>®</sup>

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

**Republic Arc-Republic Vine138 kV  
Transmission Line  
Switch Structure Installation Project**

**LEGEND:**

★ Project Location

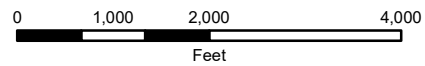




N  
CITY OF LORAIN  
LORAIN COUNTY  
OHIO

**LEGEND:**

★ Project Location



**Reference:**

ESRI Aerial Imagery, ODOT

**Coordinate System:**

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



**EXHIBIT 2**

**ATSI**<sup>®</sup>

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

**Republic Arc-Republic Vine138 kV  
Transmission Line  
Switch Structure Installation Project**





LORAIN COUNTY,  
STATE OF OHIO

BLACK RIVER-REPUBLIC ARC  
138KV LINE - FOREIGN OWNED

REPUBLIC ARC-REPUBLIC VINE  
138KV LINE - FOREIGN OWNED

#13278

#13277  
N.O. SWITCH

#1845

REPUBLIC VINE  
SUBSTATION

TO BLACK RIVER  
SUBSTATION

VINE AVE

### LEGEND

	PROPOSED STEEL POLE WITH CONCRETE FOUNDATION
	EXISTING LATTICE TOWER TO REMAIN
	EXISTING STEEL POLE STRUCTURE TO REMAIN
	EXISTING DISTRIBUTION POLE TO REMAIN
	SUBSTATION FENCE
	EXISTING 138kV TRANSMISSION LINE/FE OWNED
	EXISTING 138kV TRANSMISSION LINE/FOREIGN OWNED
	ROAD
	PROPERTY LINE
	RIGHT-OF-WAY LINE
	RAILROAD



REPUBLIC ARC – REPUBLIC VINE 138KV LINE  
N.O. SWITCH INSTALLATION PROJECT

GENERAL LAYOUT

EXHIBIT 3

SCALE: NTS

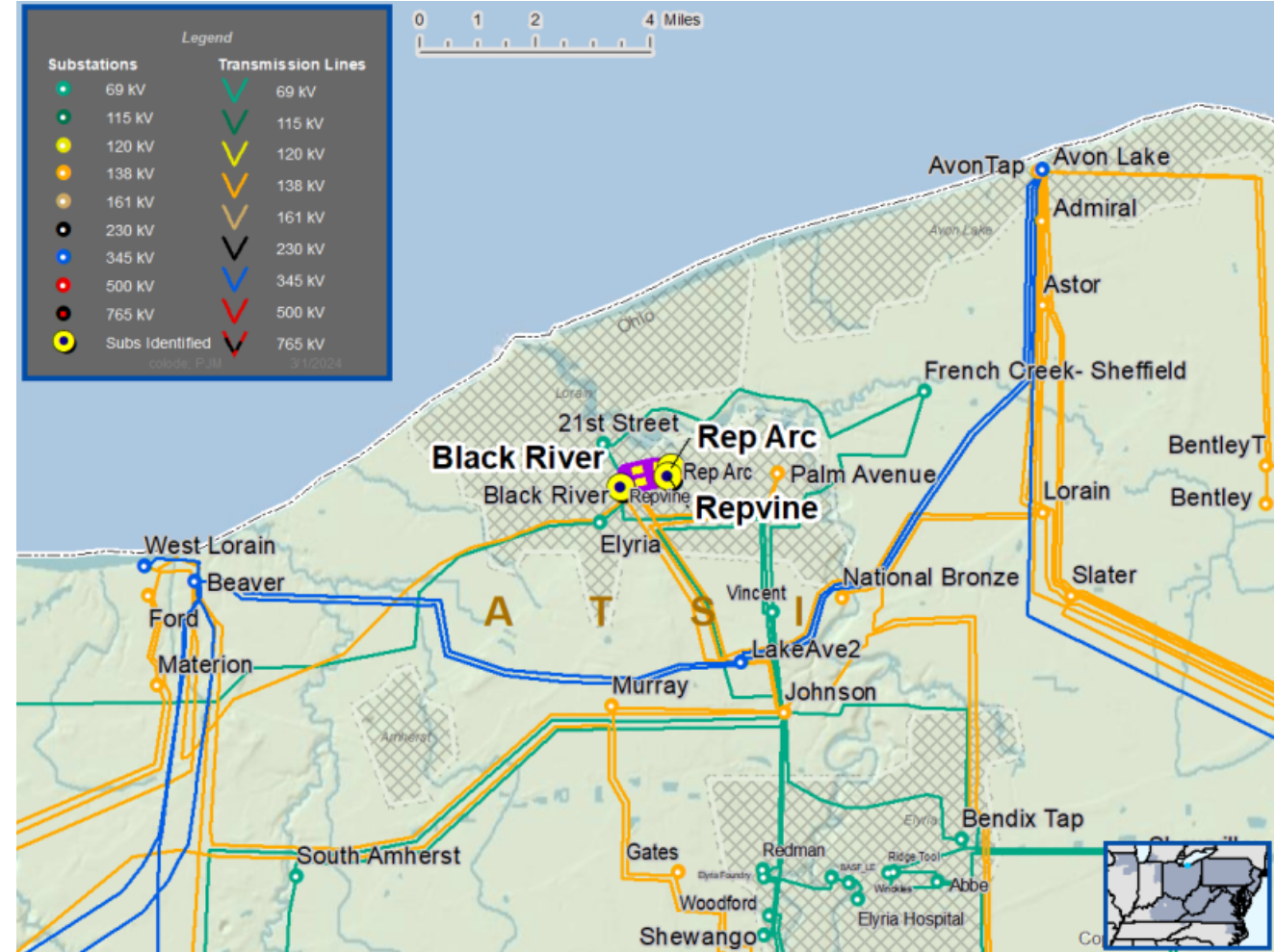
**Need Number:** ATSI-2024-029  
**Process Stage:** Solution Meeting – 04/19/2024  
**Previously Presented:** Need Meeting – 03/15/2024

**Supplemental Project Driver(s):**  
*Operational Flexibility and Efficiency*

**Specific Assumption Reference(s):**  
 System Performance Global Factors  
 ■ System reliability and performance

**Problem Statement:**

- The existing Black River - Republic Arc 138 kV Line and Black River - Republic Vine 138 kV Line are networked through customer owned substations.
- Since the customer substations are in the transmission network path, transmission flow through customer owned equipment is possible.
- The existing customer substation, Republic Arc, has minimal load.
- The existing customer substation, Republic Vine, is operational but loads are lower than historical levels.





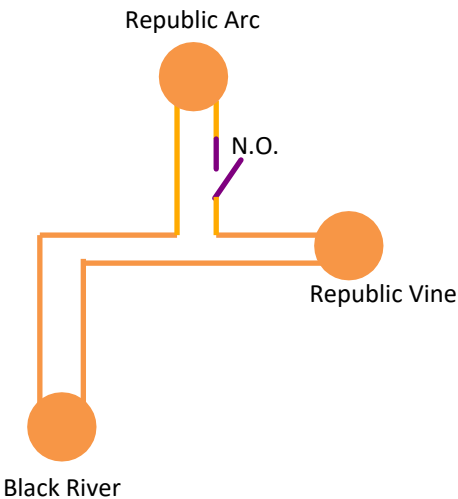
# ATSI Transmission Zone M-3 Process Lorain, Ohio

**Need Number:** ATSI-2024-029  
**Process Stage:** Solution Meeting – 04/19/2024

- Proposed Solution:**
- Cut open the Republic Arc - Republic Vine 138 kV Line and install a normally open switch.
  - Adjust protection setting at Black River, Republic Arc, and Republic Vine substations.

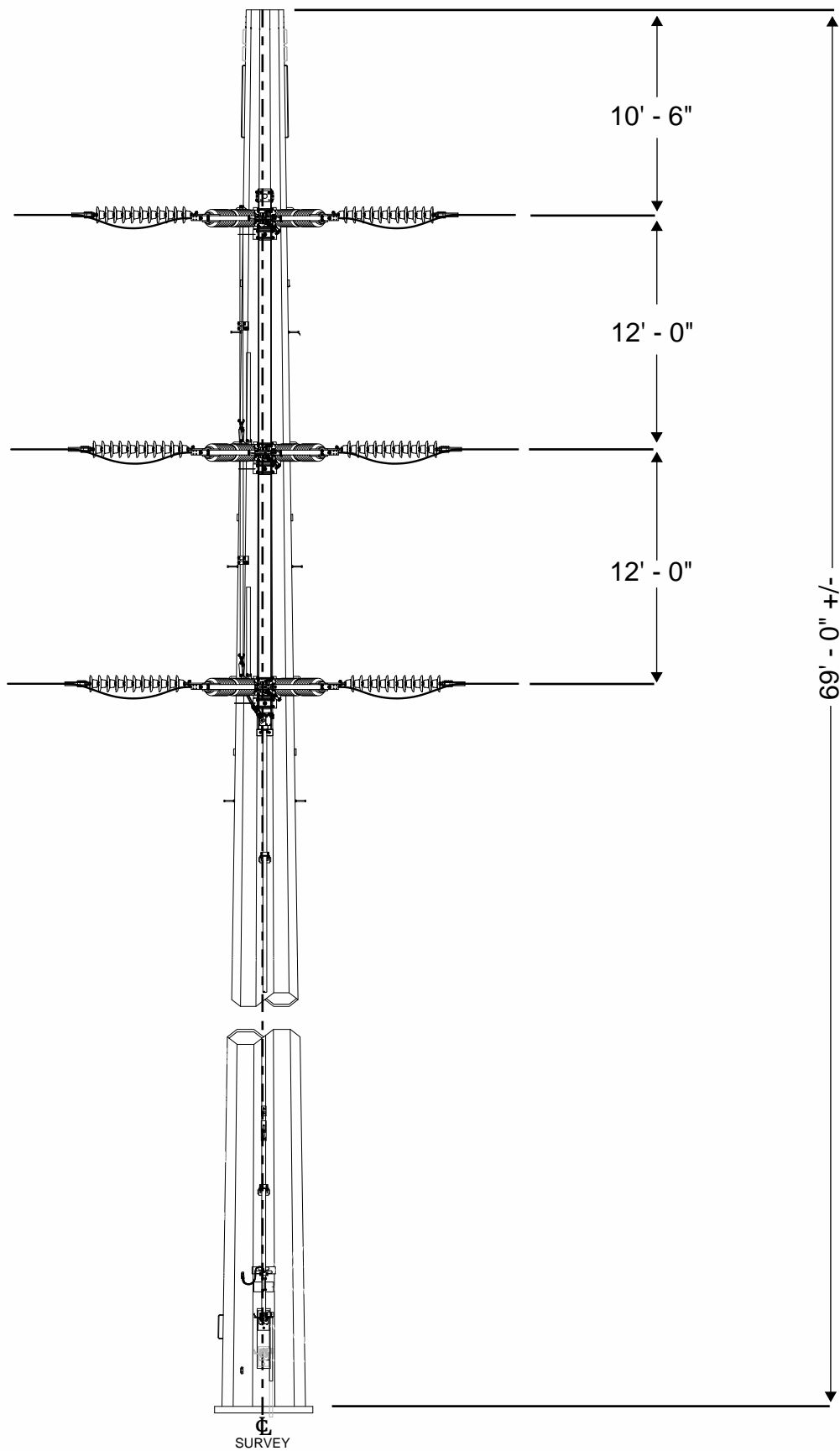
- Alternatives Considered:**
- Maintain existing condition and risk of transmission flow through customer owned equipment.

**Estimated Project Cost:** \$0.40 M  
**Project In-Service Date:** 6/2/2025  
**Status:** Engineering  
**Model:** 2023 RTEP model for 2028 Summer (50/50)



Legend	
500 kV	<div></div>
345 kV	<div></div>
138 kV	<div></div>
69 kV	<div></div>
34.5 kV	<div></div>
23 kV	<div></div>
New	<div></div>





PAPER SIZE: 8.5X11

SCALE: NTS



REPUBLIC ARC-REPUBLIC VINE 138 kV TRANSMISSION LINE  
SWITCH STRUCTURE INSTALLATION PROJECT

SINGLE CIRCUIT TUBULAR STEEL UNITIZED  
SWITCH STRUCTURE WITH CONCRETE  
FOUNDATION

EXHIBIT 5



## EXHIBIT 6

In reply refer to:  
2025-LOR-64114

March 18, 2025

Justin McKissick, MA, RPA  
Senior Archaeologist/Project Manager  
TRC Environmental Corporation  
317 E Carson Street, Suite 113  
Pittsburgh, PA 15219  
Email: [JMcKissick@trccompanies.com](mailto:JMcKissick@trccompanies.com)

RE: Section 106 Review: Republic Arc-Republic Vinline 138kV Switch Replacement Project,  
Sheffield Township, Lorain County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on February 18, 2025, regarding the above-referenced project in Lorain 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 (O.R.C.) and the Ohio Power Siting Board rules for siting this project. 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 proposed project involves the installation of a new switch along the Republic Arc-Republic Vinline 138kV transmission line. All proposed work activities will be within the existing right-of-way. No ground disturbance is anticipated while access will utilize existing lanes. 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. While there are resources fifty years of age or older within the Study Area, installation of a new switch will not create new visual impacts. Therefore, it is our opinion 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. In such a situation, this office should be contacted. If you have any questions concerning this review, please contact either myself via email at [sbiehl@ohiohistory.org](mailto:sbiehl@ohiohistory.org) or Ms. Abigail Rosenow at [arosenow@ohiohistory.org](mailto:arosenow@ohiohistory.org). Thank you for your cooperation.

Sincerely,

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

RPR Serial No. 1107498

*"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."*

## PROJECT SUMMARY FORM OHIO STATE HISTORIC PRESERVATION OFFICE

### Section 106 Review and Ohio Revised Code 149.53

This is a two-tiered form. Sections 1 to 3 must be completed by everyone submitting a Project Summary Form (PSF) to the Ohio State Historic Preservation Office (SHPO). Sections 4 to 6 are reserved for agencies, consultants, or applicants that have defined an Area of Potential Effects (APE), identified consulting parties and historic properties, and have made a determination of effect.

For projects requiring a license from the Federal Communications Commission, DO NOT USE THIS FORM. Please submit the FCC Forms 620 or 621.

### SECTION 1: PROJECT CONTACT INFORMATION

All contact information provided must include the name, address and phone number of the person listed. Email addresses should also be included, if available. Questions can be directed to [section106@ohiohistory.org](mailto:section106@ohiohistory.org).

A. Applicant Contact Information:

- a. Name: **Justin D. McKissick, MA, RPA**
- b. Agency/Company: **TRC Environmental Corporation**
- c. Mailing Address: **317 E. Carson Street, Suite 113, Pittsburgh, PA 15219**
- d. Phone Number: **412-660-7937**
- e. Email Address: **jmckissick@trccompanies.com**

B. Project Name and Basic Information

- a. Project Name: **Republic Arc-Republic Vineline 138 kV Switch Replacement Project**

- b. Is this a new project submittal to SHPO? **YES** ~~or NO~~

If NO, please provide the SHPO/RPR Reference Number from previous submission.

- c. Reference number used by Federal/State Agency to identify this project.

C. Project Address or vicinity: **The proposed Project is situated north of Highway 57, approximately 0.24 miles (mi) west of its intersection with Globe Avenue (approximate centroid coordinates 41.446094, -82.146594) (Figure 1).**

D. City/Township: **Sheffield Township**

E. County: **Lorain County**

F. Federal Agency/Agency Contact. (HUD Entitlement Communities acting under delegated environmental review authority should list their own contact information). **N/A**

G. Type of Federal Assistance. List all known sources of federal funding, approvals, and permits. **N/A**

H. State Agency and Contact Person (if applicable): **OPSB**

I. Type of State Assistance (if applicable)

## SECTION 2: PROJECT DESCRIPTION AND LOCATION

- A. Provide a detailed description of the proposed work associated with the project.

**The proposed Project will involve the installation of a new switch at existing structure 13278 within an existing overhead utility right-of-way (ROW). The proposed Project Study Area measures 1.7 acres (ac).**

- B. If the project involves ground-disturbing construction activities, provide a description of the construction activity and the horizontal and vertical dimensions of the expected ground disturbance.

**No ground disturbance activities are anticipated. The entire Project area is within former urban area and is comprised of concrete, asphalt, and gravel. Access/egress will utilize an existing access and gravel drives. All work will be within the existing, disturbed right-of-way (ROW) (Figure 2).**

- a. Provide photographs of the area expected to have ground disturbance. See **Attachment 1.**

- b. Provide a narrative description of current land use and conditions.

**Presently, the landscape is comprised of existing, maintained, utility ROW located within ODOT's ROW in an urban roadway setting. Ground cover is concrete, asphalt, and gravel (Figure 2).**

- c. If known, please provide a description of previous land use and past ground disturbance activities. Include historic aerials and maps if useful.

**Historically, the Study Area was likely wooded or open fields. As settlement expanded westward, the wooded areas were likely removed and the landscape converted to agricultural fields or pastures through the nineteenth century. Urban sprawl and industrial development altered the landscape to its current condition.**

**A review of available historic maps was conducted to determine the presence of potential historic structures and buildings (50 years of age or older) and other possible historic features within or adjacent to the Study Area that may be impacted by the proposed Project.**

**By 1874, the region had been settled with widely spaced buildings along the established roadways throughout the region. Several buildings were denoted along a single road to the north of the Study Area and include a *Sawmill* and several residential structures. The Study Area is on two (2) parcels attributed to *Edison and Co.* (Attachment 2, Image 1). The *L.S. and T.V Railroad* had been constructed to the west.**

**The 1896 historic map displayed a changed landscape. The city of Lorain had expanded to the Project area as a new residential grid had**

been laid out south of the Study Area. North of the Study Area, the *Johnson Cos Steel Plant* was in operation. The steel plant included a main office, several buildings, and railroad lines that connected to the now *Cleveland, Lorain, and Wheeling Railroad*. The Study Area was situated on several parcels associated with the steel plant. No buildings were mapped in the vicinity (Attachment 2, Image 2).

The 1901 historic USGS map displayed a similar, developed landscape. The steel plant had increased in size, with several new railroad lines and additional buildings (Attachment 2, Image 3). The city of Lorain also increased as new roads and developments were denoted to the south and west

The 1960 USGS map also displayed a continued altered landscape. Several new residential developments were constructed throughout the region and the city of Lorain expanded to the south and west of the Study Area. The steel plant was still in operation throughout the middle twentieth century (Attachment 2, Image 4).

Between 1960 and present day, the general landscape has remained heavily developed with industrial and residential facilities. The landscape has been heavily disturbed.

- C. Provide a map depicting the location of the project; road names must be identified and legible. The use of Google maps is acceptable but any legible aerial, topographic, or county map will work. Please outline the work limits of your project or if it is a single house, a dot on the house will suffice. **See Figure 2**
- D. Current color photographs of all buildings or structures that are directly or indirectly affected by the project. Include an approximate age of the buildings/structures. **N/A**

### **SECTION 3: ASSOCIATED DOCUMENTATION**

If available, provide any additional information such as plan or schematic sheets, renderings of the proposed building/structure/development, and/or agency correspondences. If a Phase I archaeology or reconnaissance level history architecture survey was completed, please provide the report. **N/A**

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Email the completed PSF form and supporting documentation to our office via [section106@ohiohistory.org](mailto:section106@ohiohistory.org). Submission of the form does not constitute completion of the consultation process. Once the SHPO has received the information they will provide within 30 days one of the following recommendations in writing:

- A finding of *No Historic Properties Affected* [36 CFR § 800.4(d) (1)].
- Request additional information or clarification.
- Request a Phase I archaeology and/or reconnaissance level history architecture survey if not previously provided.
- A finding of *No Adverse Effect* on historic properties [36 CFR § 800.5(b)].
- A finding of *Adverse Effect* on historic properties [36 CFR § 800.5(d) (2)].

Note that the file size is limited to 20 MB. If your file sizes are larger, SHPO will be unable to receive your submission. To check your submission was received and logged in for our review, please visit <https://www.ohiohistory.org/preserving-ohio/federal-state-reviews/project-status-check-for-106/>

## PLEASE READ BEFORE SUBMITTING YOUR PSF

If you are an agency or consultant working on behalf of an agency continue to SECTION 4:  
AREA OF POTENTIAL EFFECTS

### SECTION 4: AREA OF POTENTIAL EFFECT

The Area of Potential Effect (APE) means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking [36 CFR Part 800.16(d)].

- A. Provide an aerial map depicting the project's APE (**See Figure 2**).
- B. Provide a description of the horizontal and vertical extent of the APE that accounts for direct and indirect effects. Explain the steps taken to identify the APE, and your justification for the boundaries chosen.

**The APE will include all areas in which construction activities associated with the proposed Project will take place. There are no anticipated ground disturbances associated with the proposed Project. All vehicle access/egress will utilize an existing access drive. The APE will also include a viewshed that will be based on LIDAR data, vegetation, topography, and buildings, which will reduce the APE to areas with positive visibility of the Project infrastructure within 0.25 mi of the undertaking. While there are structures in the vicinity of the Study Area that are over 50 years of age, the installation of the infrastructure will not create new visual impacts.**

### SECTION 5: IDENTIFICATION OF HISTORIC PROPERTIES

Describe the cultural resources and properties listed in or eligible for listing in the National Register of Historic Places located within your APE and how they were identified. Identification efforts must be carried out by a qualified individual or individuals who meet the Secretary of the Interior's Professional Qualification Standards and have demonstrated familiarity with the range of potentially historic properties that may be encountered, and their characteristics.

- A. Include a SHPO GIS map depicting known resources within the APE. (**See Figure 3**).
- B. Provide a clear description of the steps taken to determine the presence or absence of historic properties within the APE.

**TRC performed a desktop review based on data received from the Ohio History Connection (OHC) on January 22, 2025, to identify the presence of previously recorded significant historic properties, including above-ground historic resources and/or archeological sites, mapped within one (1)-mi of the Study Area.**

**The file review revealed there are three (3) NRHP-listed recorded within one (1)-**

mi of the proposed Project. Table 1 contains a list of these historic properties, along with their distance and direction from the proposed Project.

**Table 1: NRHP-listed resources within one (1)-mi of the Project.**

Ref. No.	Resource Name	NRHP Status	Distance (mi)	Direction
82003607	St. Ladislaus Roman Catholic Church	Listed	0.17	SW
92000886	Lorain YMCA Building	Listed	0.41	E
82000887	Johnson Steel Street Railway Company General Offices Building	Listed	0.5	E

There are 20 above-ground historic resources that have had SHPO determinations of eligibility (DOE) for various projects. The nearest of these DOE properties is located 0.2 mi to the east. In addition, there are 300 above-ground historic resources recorded within one (1)-mi of the proposed Project. The nearest recorded above-ground historic resource is located 179 feet (ft) south-southwest of the Study Area. No Ohio Genealogical Society (OGS) cemeteries are recorded within one (1)-mi.

Two (2) archaeological surveys have been conducted within one (1)-mi of the proposed Project. From these surveys, and the efforts of local informants, eight (8) archaeological sites are recorded within one (1)-mi. The sites include one (1) early twentieth century historic site and seven (7) pre-contact open sites that date to the Paleolithic, Woodland, and Late Prehistoric Periods. All eight (8) sites are situated a minimum of 0.59 mi to the north.

- C. Provide a description of how you consulted with others (including the Indian tribes) who may have knowledge of historic properties in the APE. Please provide any written responses that you may have received from the public and consulting parties. **N/A**
- D. If applicable, include a pdf copy of your Phase I archaeology and/or reconnaissance level history architecture reports. **N/A**
  - a. Provide shapefiles for the area surveyed for archaeological and history architecture properties.

## **SECTION 6: DETERMINATION OF EFFECT**

If you believe that you have gathered enough information to conclude the Section 106 process, you may be ready to make a determination of effect and ask the SHPO for concurrence. Please select one of the following determinations, then explain the basis for your decision:

- **No Historic Properties Affected [36 CFR § 800.4(d) (1)].**
  - **Based on the information provided above, it is TRC's opinion that no Historic Properties will be affected by the proposed undertaking. As there will be no**



**subsurface disturbances, there is no potential to impact archaeological resources, if present. Additionally, the landscape has been heavily disturbed from past industrial development. For above-ground historic resources, the new switch will be installed on an existing infrastructure within an existing overhead utility ROW; therefore, no new visual impacts. Please review the proposed project and provide SHPO's opinion on the project's potential for impact on cultural resources, if any.**

- No Adverse Effect [36 CFR § 800.5(b)] on historic properties.
- Adverse Effect [36 CFR § 800.5(d) (2)] on historic properties. You may also include an explanation of how these adverse effects might be avoided, reduced, or mitigated.

Please email the completed form and supporting documentation to our office via [section106@ohiohistory.org](mailto:section106@ohiohistory.org). Submission of the form does not constitute completion of the consultation process. Once the SHPO has received the information they will provide within 30 days one of the following recommendations in writing:

- Agree with your determination of effect
- Suggest a different determination of effect
- Request additional information or clarification.
- Require additional information gathering efforts such as a Phase II archaeology or history architecture evaluation.

Note that the file size is limited to 20 MB. If your file sizes are larger, SHPO will be unable to receive your submission. To check your submission was received and logged in for our review, please visit <https://www.ohiohistory.org/preserving-ohio/federal-state-reviews/project-status-check-for-106/>

## References

### The American Atlas Company

- 1896      “Sheffield Township” in *Atlas and Directory of Lorain County, Ohio*. Published by The American Atlas Company, Cleveland, Ohio. Electronic document, Amherst Township, Atlas: Lorain County 1896, Ohio Historical Map ([historicmapworks.com](http://historicmapworks.com)), accessed January 27, 2025.

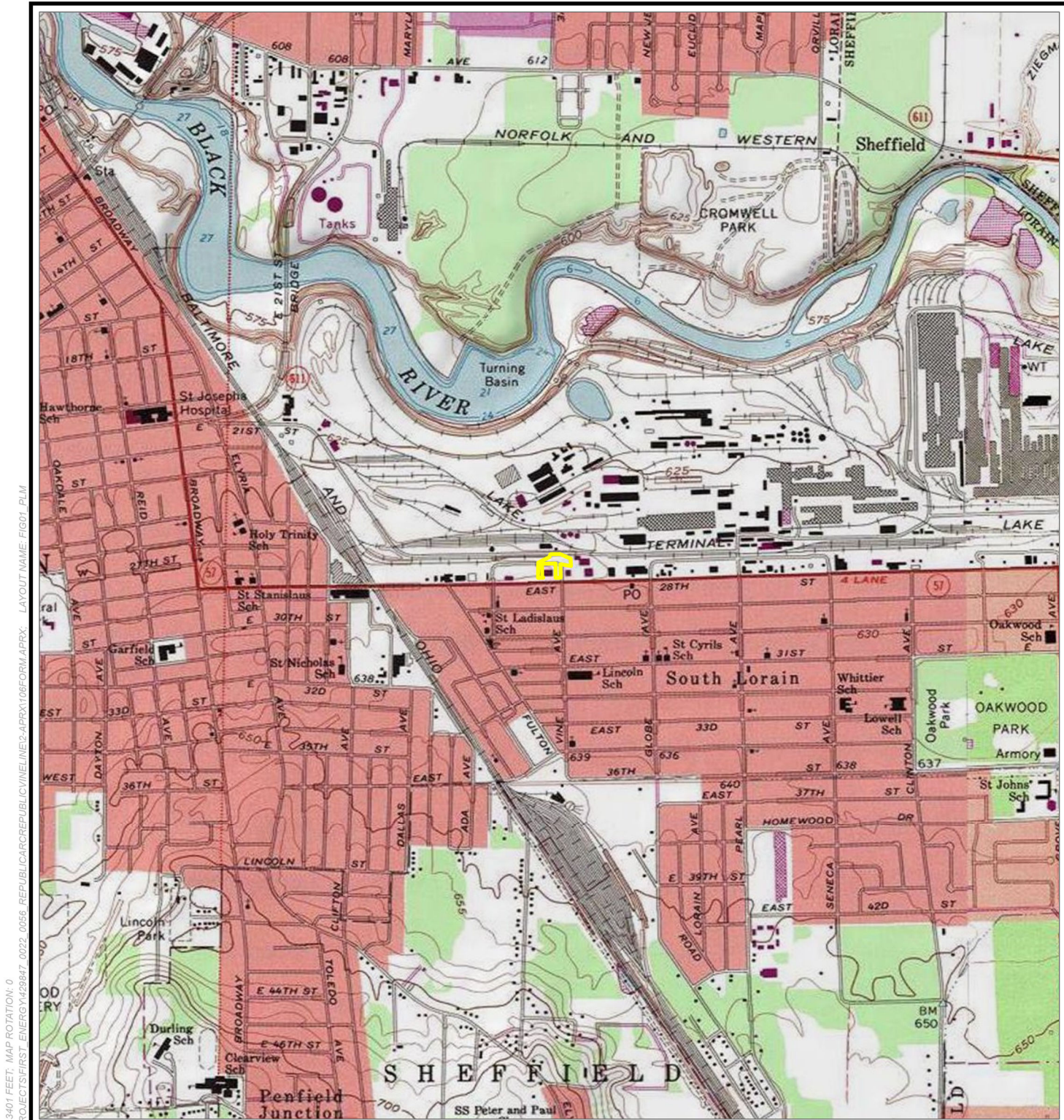
### Lake, D.J., C.E.

- 1874      “Sheffield” in *An Atlas of Lorain County, Ohio*. Published by Titus, Simmons, and Titus, Philadelphia, Pennsylvania. Electronic document, <https://historicmap-works.com/Map/US/57172/Amherst/Lorain+County+1874/Ohio/>, accessed January 27, 2025.

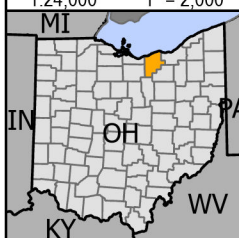
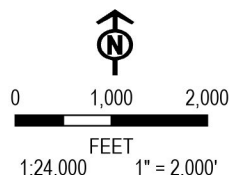
### United States Geographical Survey

- 1901      Oberlin, OH 15-minute series topographic series. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#15/41.4460/-82.1465>, accessed January 27, 2025.
- 1960      Lorain, OH 7.5-minute series topographic series. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#15/41.4460/-82.1465>, accessed January 27, 2025.





 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, LORAIN QUAD

PROJECT: **FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT**  
**LORAIN COUNTY, OH**

TITLE: **PROJECT LOCATION MAP**

DRAWN BY: M. OPEL PROJ. NO.: 429847.0022.0056

CHECKED BY: J. MCKISSICK

APPROVED BY: B. FALKINBURG

DATE: JANUARY 2025

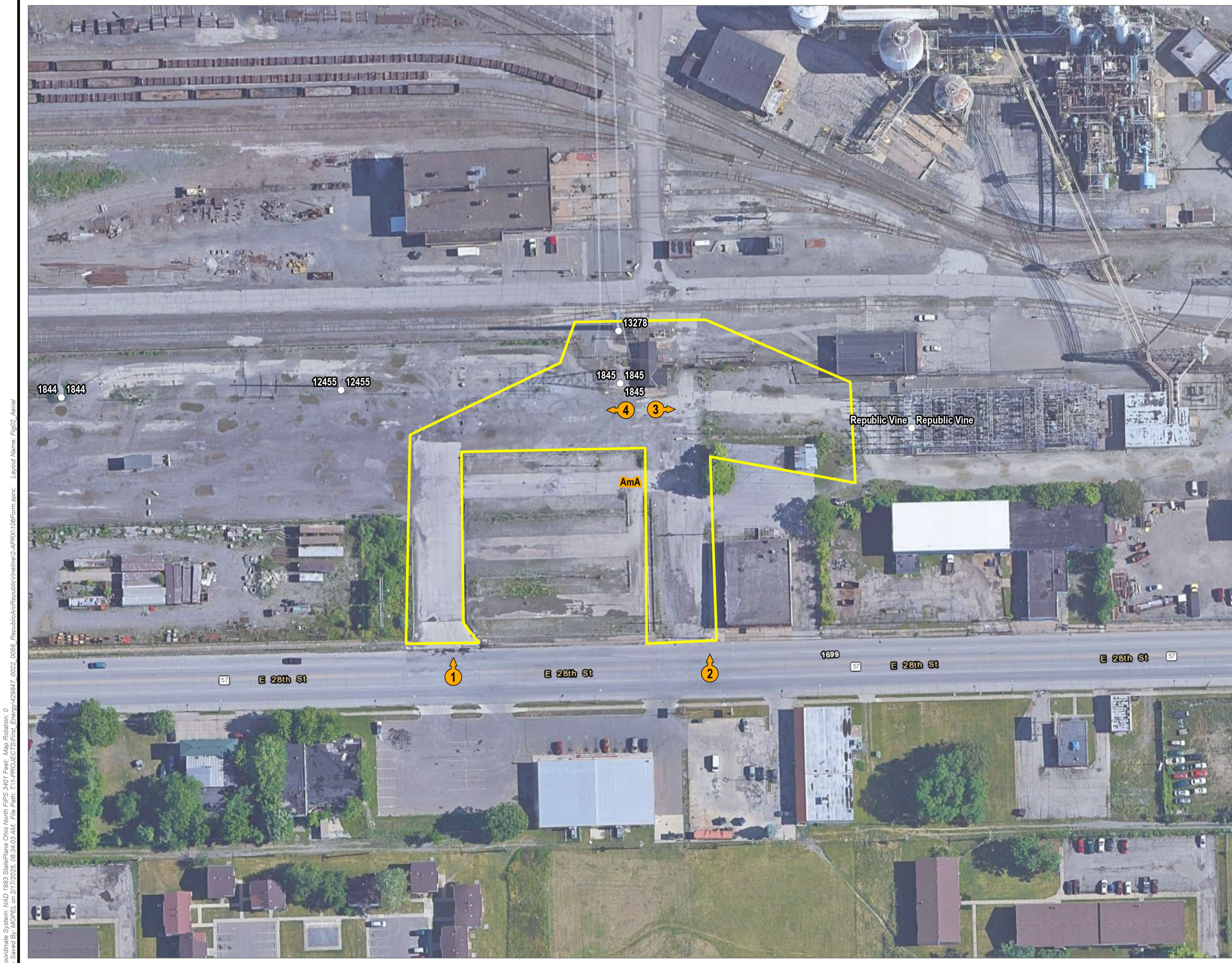
**FIGURE 1**



1382 WEST NINTH STREET  
SUITE 400  
CLEVELAND, OH 44113  
PHONE: 216-344-3072

FILE: 106FORM





PROJECT STUDY AREA

EXISTING STRUCTURE

MAPPED SOIL UNITS

PHOTO LOCATION

BASE MAP: GOOGLE MAPS.

1:1,200

1" = 100'

0

100

200

FEET

PROJECT

FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT  
LORAIN COUNTY, OH

TITLE:

AERIAL BASEMAP WITH PHOTOGRAPHS

DRAWN BY: M. OPEL

PROJ. NO.: 429847.0022.0056

CHECKED BY: J. MCKISSICK

APPROVED BY: B. FALKINBURG

DATE: FEBRUARY 2025

FIGURE 2

TRC

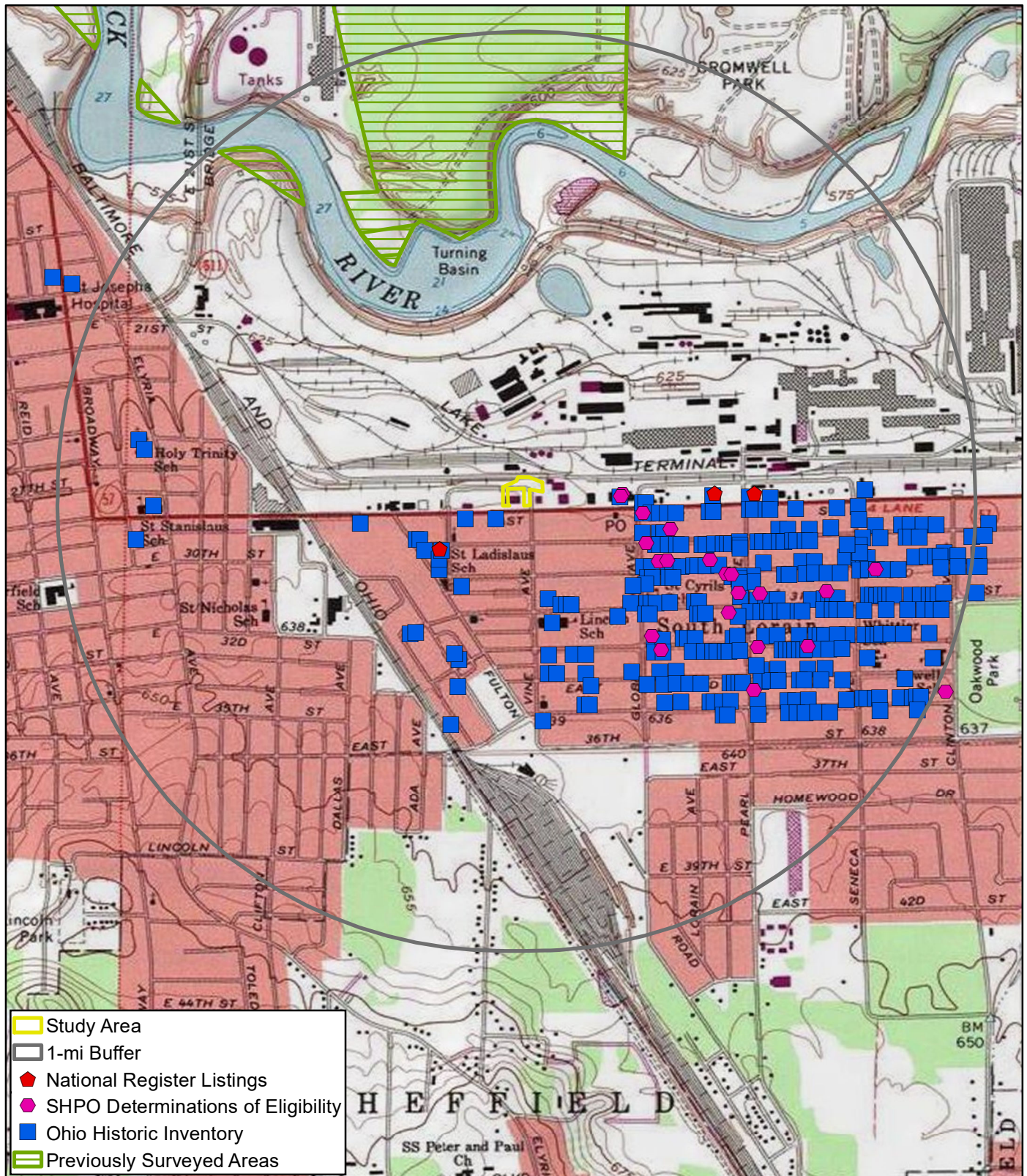
1382 WEST NINTH STREET  
SUITE 400  
CLEVELAND, OH 44113  
PHONE: 216-344-3072

FILE:

106Form.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
-- Saved By: MOPEL on 2/17/2025 08:34:03 AM. File Path: T:\1-PROJECTS\First\_Energy\429847\_0022\_0056\_RepublicArcRepublicVine\106Form.aprx. Layout Name: Fig02\_Aerial





BASEMAP FROM 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLE

N 1" = 1,667' 0 0.2  
1:20,000 Miles

**TRC**

317 E. Carson Street  
Suite 113  
Pittsburgh, PA 15219

TRC - GIS

PROJECT: **Republic Arc-Republic Vinline 138 kV  
Switch Replacement Project**

TITLE: **OHPO Database Search  
Results Map**

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	FEBRUARY 2025
PROJ. NO.:	429847.0022.0056
FILE:	Republic.mxd

**Figure 3**




## **ATTACHMENT 1**

### **Photographs**



<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> Sheffield Township, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 1.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing north, viewing the Study Area from Highway 57. Note the existing overhead utility line infrastructure and asphalt ground cover.	

<b>Photo No. 2.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing north, viewing the Study Area from Highway 57. Note the existing overhead utility line infrastructure and asphalt ground cover.	





**PHOTOGRAPHIC RECORD**  
**Republic Arc-Republic Vineline 138 kV Switch Replacement Project**

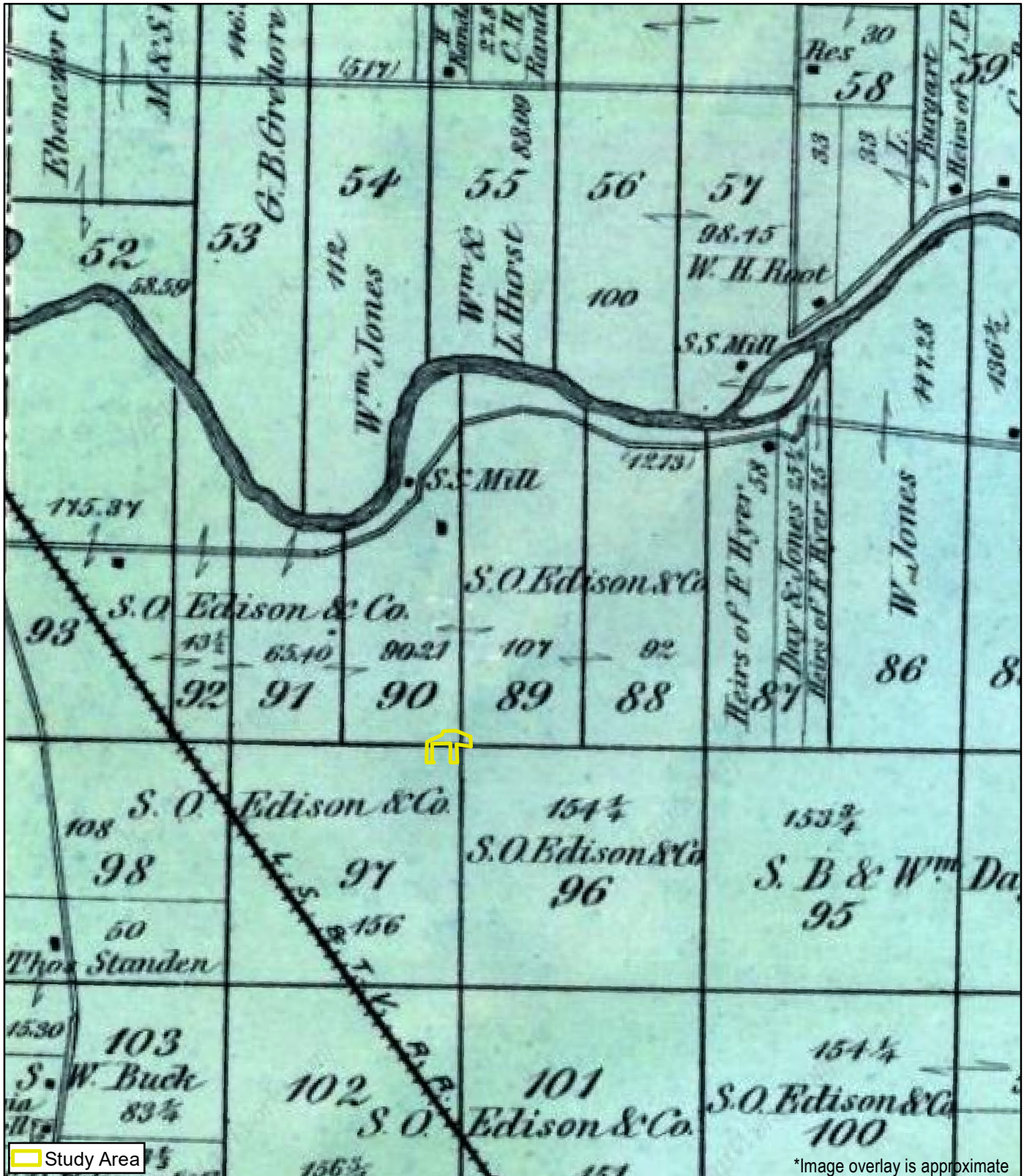
<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> Sheffield Township, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 3.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing east, viewing the Study Area. Note the disturbed landscape.	

<b>Photo No. 4.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing west, viewing the Study Area. Note the disturbed landscape.	



**ATTACHMENT 2**  
**Historic Map Images**



BASEMAP FROM MAP of LORAIN COUNTY, OHIO

\*Image overlay is approximate

N  
1" = 1,500'  
1:18,000  
0 0.18  
Miles



317 E. Carson Street  
Suite 113  
Pittsburgh, PA 15219

TRC - GIS

PROJECT:

**Republic Arc-Republic Vineline 138 kV  
Switch Replacement Project**

TITLE:

**Study Area circa 1874 (Lake)**

DRAWN BY:

JUSTIN MCKISSICK

CHECKED BY:

CURTIS BIONDICH

APPROVED BY:

CURTIS BIONDICH

DATE:

FEBRUARY 2025

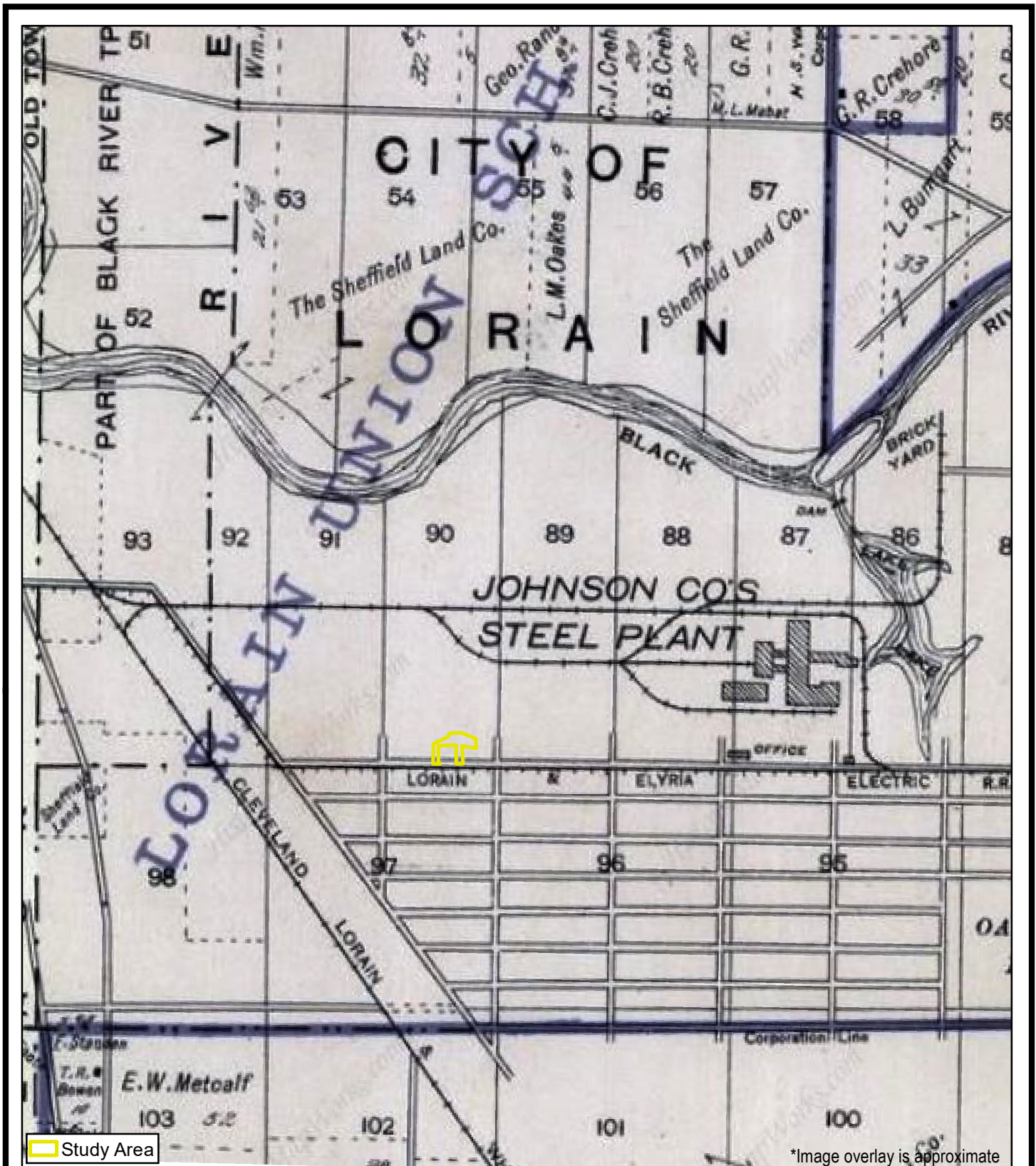
PROJ. NO.:

429847.0022.0056

FILE:

Republic.mxd

**Attachment 2 - Image 1**



BASEMAP FROM ATLAS of LORAIN COUNTY, OHIO

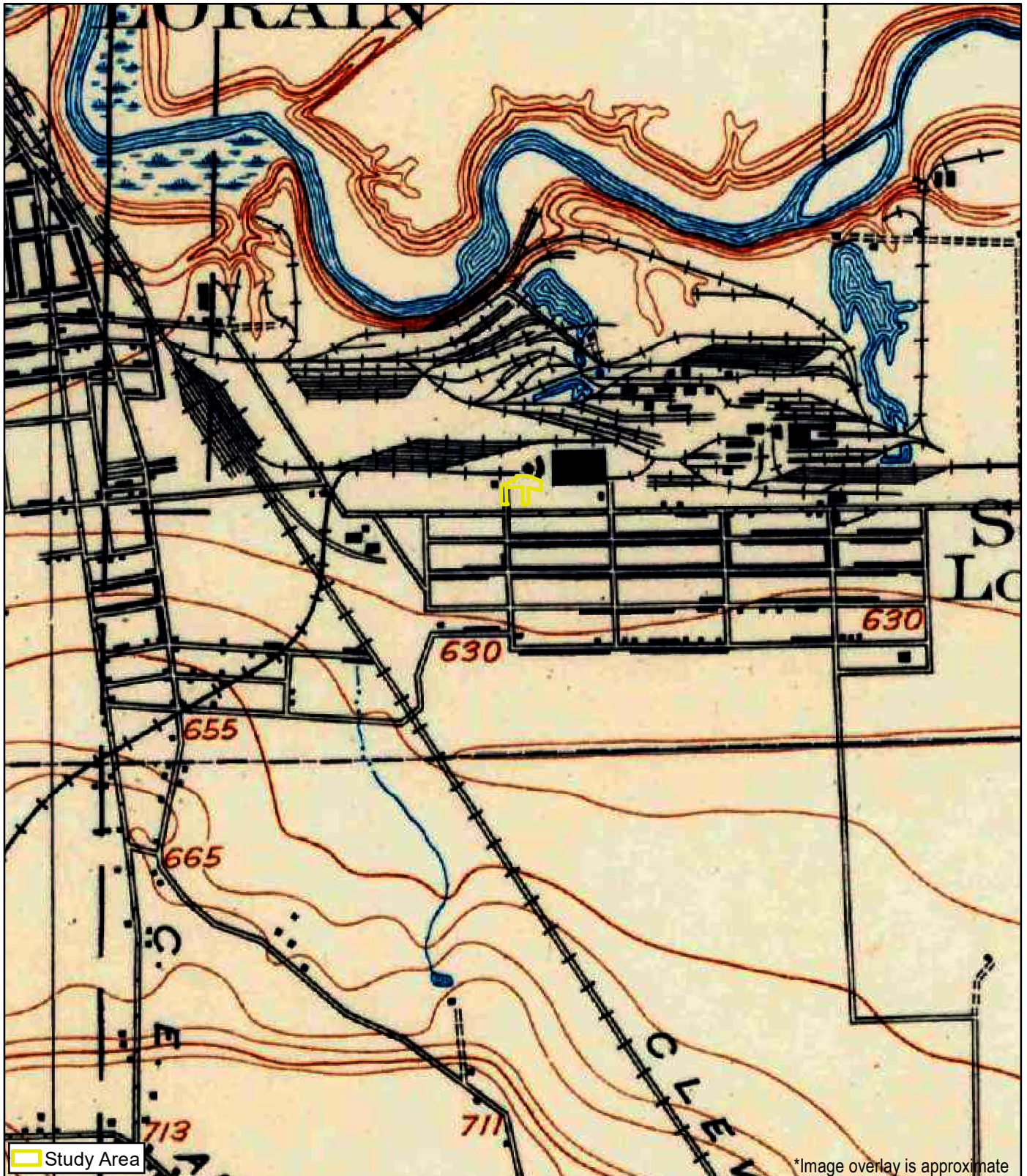
N  
 1" = 1,500'  
 1:18,000  
 0 0.18  
 Miles  
  
 317 E. Carson Street  
 Suite 113  
 Pittsburgh, PA 15219  
 TRC - GIS

PROJECT:	<b>Republic Arc-Republic Vineline 138 kV Switch Replacement Project</b>
TITLE:	<b>Study Area circa 1896 (American Atlas Company)</b>

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	FEBRUARY 2025
PROJ. NO.:	429847.0022.0056
FILE:	Republic.mxd

**Attachment 2 - Image 2**





BASEMAP FROM 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLE

N 1" = 1,667' 0 0.2  
1:20,000 Miles

**TRC**

317 E. Carson Street  
Suite 113  
Pittsburgh, PA 15219

TRC - GIS

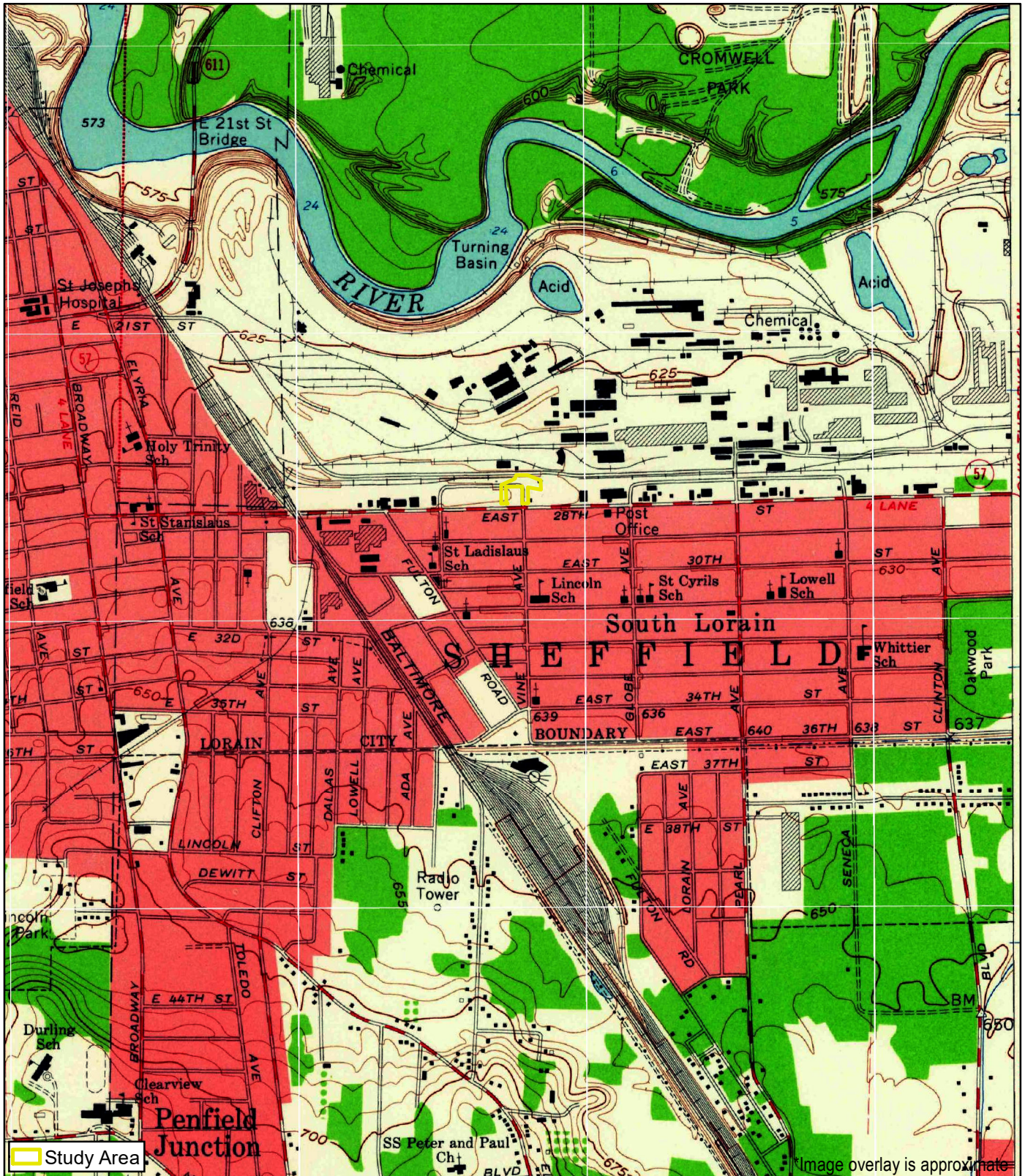
PROJECT: **Republic Arc-Republic Vineline 138 kV  
Switch Replacement Project**

TITLE: **Study Area circa 1901 (USGS)**

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	FEBRUARY 2025
PROJ. NO.:	429847.0022.0056
FILE:	Republic.mxd

**Attachment 2 - Image 3**





BASEMAP FROM 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLE

1" = 1,667'  
1:20,000

0 0.2  
Miles

**TRC**

317 E. Carson Street  
Suite 113  
Pittsburgh, PA 15219

TRC - GIS

PROJECT:  
**Republic Arc-Republic Vineline 138 kV  
Switch Replacement Project**

TITLE:  
**Study Area circa 1960 (USGS)**

DRAWN BY: JUSTIN MCKISSICK  
CHECKED BY: CURTIS BIONDICH  
APPROVED BY: CURTIS BIONDICH  
DATE: FEBRUARY 2025  
PROJ. NO.: 429847.0022.0056  
FILE: Republic.mxd

**Attachment 2 - Image 4**





**Department of  
Natural Resources**  
ohiodnr.gov

## EXHIBIT 7

**Mike DeWine, Governor**  
**Mary Mertz, Director**

### Office of Real Estate & Land Management

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

February 21, 2025

Emma Given  
TRC Companies, Inc.  
781 Science Boulevard, Suite 200  
Gahanna, Ohio 43230

**Re:** 25-0179\_Arc-Republic Vineline 138 kV Switch Replacement

**Project:** The proposed project involves the construction of a new switch at Structure 13278.

**Location:** The proposed project is located in Sheffield Township, Lorain 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 project area. Records for other unique ecological features within a mile of the project are as follows:

Great Blue Heron Rookery

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 feature listed above is not recorded within the boundaries of the specified project area. 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 species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH  $\geq$  20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "[OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING](#)". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Eileen Wyza at [Eileen.Wyza@dnr.ohio.gov](mailto: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 pondhorn (*Unio merus tetralasmus*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact this species.

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

State Endangered

lake sturgeon (*Acipenser fulvescens*)

Ohio lamprey (*Ichthyomyzon bdellium*)

spotted gar (*Lepisosteus oculatus*)

### State Threatened

American eel (*Anguilla rostrata*)  
bigmouth shiner (*Notropis dorsalis*)  
channel darter (*Percina copelandi*)

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

The project is within the range of the 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 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](mailto: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.





1382 W Ninth St., Suite 400  
Cleveland, OH 44113

T 216.344.3072  
TRCcompanies.com

January 24, 2025

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

**Project Submittal for an Environmental Review of the Republic Arc-Republic Vineline 138 kV Switch Replacement Project located in Sheffield Township, Lorain County, Ohio.  
(TRC Project No. 429847.0022.0056)**

To Whom It May Concern,

On behalf of the FirstEnergy Corporation (FirstEnergy), TRC Environmental Corporation (TRC) is requesting an Environmental Review of the proposed Republic Arc-Republic Vineline 138 kV Switch Replacement Project (Project) located in Sheffield Township, Lorain County, Ohio (**Figure 1: Site Location Map**).

**Project Location (latitude/longitude):**

Centroid: 41.446094, -82.146594

**County:** Lorain

**Project Description:** The proposed Project involves the construction of a new switch at Structure 13278. The proposed Project Study Area is approximately 1.70 acres, located in Sheffield Township, Lorain County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (Figure 2: Aerial Map) is comprised of an existing, maintained, utility right-of-way (ROW) located within ODOT's ROW in an urban roadway setting. Currently as proposed, tree clearing is anticipated within the Project Study Area. No tree clearing is anticipated within the Project Study Area

**On-site Habitat Description:** Based on available desktop resources, TRC has identified the following habitats within the Project Study Area:

Land Use: Existing, maintained utility ROW located within an urban roadway corridor.

Wetlands: The proposed Project Study Area does not include any National Wetlands Inventory (NWI) wetlands within the proposed project limits. A surface water delineation will be performed prior to construction of the proposed Project to determine the presence/absence of wetlands.

Streams: The proposed Project Study Area does not include any National Hydrography Dataset (NHD) streams. A surface water delineation will be performed prior to construction of the proposed Project. In-stream work is not anticipated as a result of this Project.

Forested Area: The proposed Project Study Area contains no forested habitat. No tree clearing is anticipated within the Project Study Area.

Uplands: The proposed Project Study Area includes upland habitat within the existing utility ROW located on industrial land.

Floodplains: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panel 39093C0109E (eff. 3/9/2021), the proposed Project is not located within a FEMA-mapped 100-Year Flood Zone.

**Potential Disturbance:** It is anticipated that due to the nature of the Project, jurisdictional resources will not be impacted by the proposed Project activities. Avoidance and minimization will be utilized during construction. If wetlands and streams cannot be avoided, timber matting will be utilized during construction for any temporary impacts. The most current Best Management Practices will be followed during construction and disturbed areas will be restored to pre-construction conditions as much as applicable. No tree-clearing is anticipated within the Project Study Area. However, if minor tree clearing is needed as a result of this Project; it will take place within the USFWS recommended tree clearing dates (October 1 – March 31).

Please do not hesitate to contact me at (330) 446-0265 or via email at [EGiven@TRCCompanies.com](mailto:EGiven@TRCCompanies.com) if you have any questions or require additional information.

Regards,



Emma Given, PhD  
Ecologist

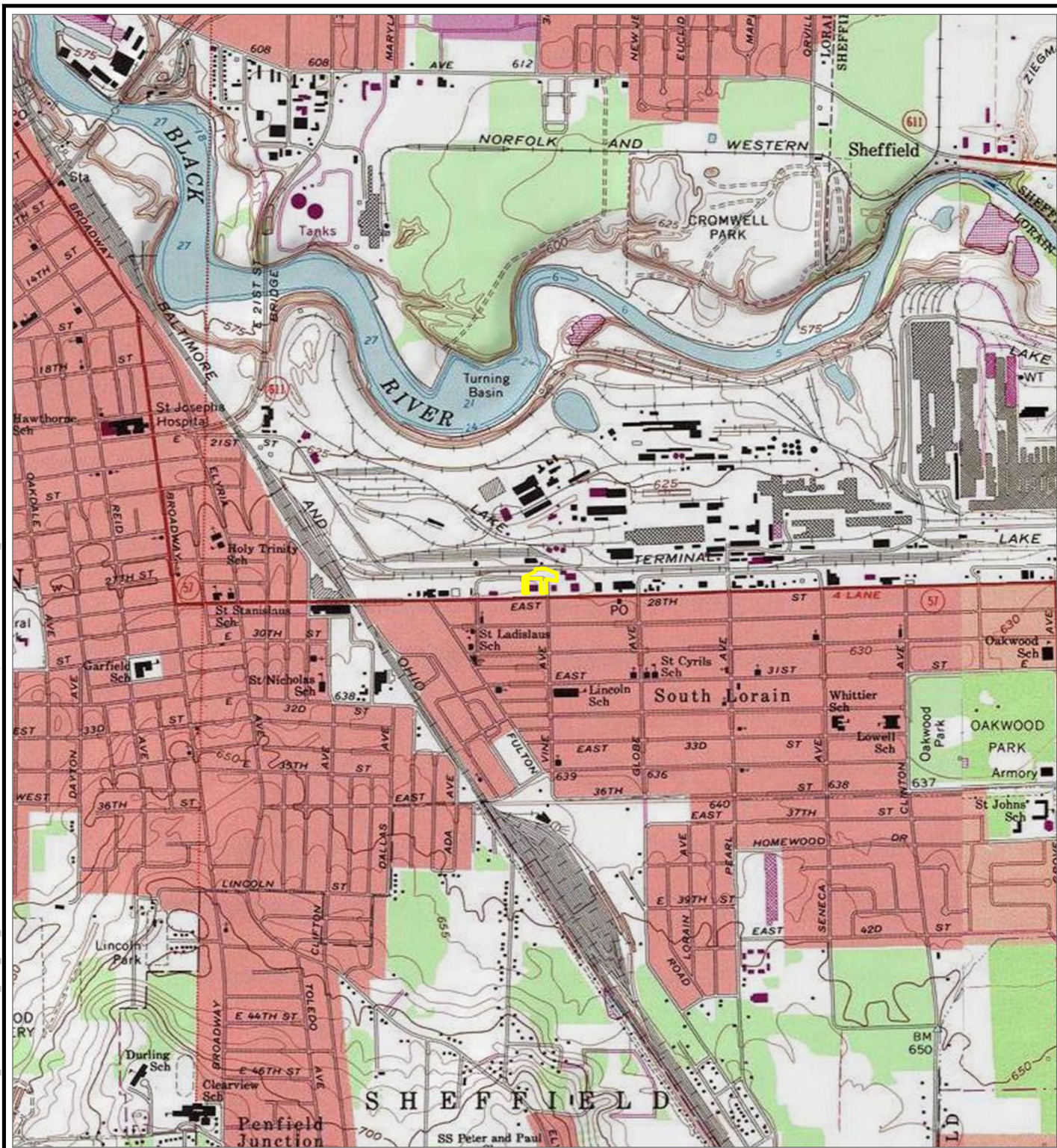
Attachments:

Figure 1: Site Location Map

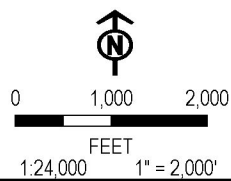
Figure 2: Aerial Map



COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH RIPS 3401 FEET, MAP ROTATION: 0  
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 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, LORAIN QUAD

PROJECT: **FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT**  
**LORAIN COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL PROJ. NO.: 429847.0022.0056

CHECKED BY: M. MOLNAR

APPROVED BY: B. FALKINBURG

DATE: JANUARY 2025

**FIGURE 1**



1382 WEST NINTH STREET  
SUITE 400  
CLEVELAND, OH 44113  
PHONE: 216-344-3072

FILE: WDR



Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
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PROJECT STUDY AREA

EXISTING STRUCTURE


BASE MAP: GOOGLE MAPS.



1:1,200  
1" = 100'

0 100 200 FEET



PROJECT: <b>FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT</b> <b>LORAIN COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0056
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: JANUARY 2025	
<div><div>1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072</div></div>	
FILE:	WDR.aprx

WDR.aprx



**Stolarski, Adrianna**

---

**From:** Eileen.Wyza@dnr.ohio.gov  
**Sent:** Tuesday, March 4, 2025 8:20 AM  
**To:** Slabe, Jenna  
**Cc:** Falkinburg, Brad M (Ruszala, Amy M); Molnar, Maggie; Stolarski, Adrianna  
**Subject:** [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Republic Arc-Republic Vaseline 138kV Switch Replacement Project

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

Hello Jenna,

Per review of the desktop survey provided for FirstEnergy's Republic Arc-Republic Vaseline 138kV Switch Replacement Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Therefore, 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](mailto:Eileen.Wyza@dnr.ohio.gov)



Support Ohio's wildlife. Buy a license or stamp at [wildohio.gov](http://wildohio.gov).

*This message is intended solely for the addressee(s). Should you receive this message by mistake, we would be grateful if you informed us that the message has been sent to you in error. In this case, we also ask that you delete this message and any attachments from your mailbox, and do not forward it or any part of it to anyone else. Thank you for your cooperation and understanding.*

*Please consider the environment before printing this email.*

---

**From:**  
Slabe,  
Jenna

<JSlabe@trccompanies.com>

**Sent:** Monday, March 3, 2025 1:47 PM

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

**Cc:** Falkinburg, Brad <BFalkinburg@trccompanies.com>; Molnar, Maggie <MMolnar@trccompanies.com>; Stolarski, Adrianna <astolarski@firstenergycorp.com>

**Subject:** Desktop Hibernacula Assessment: FirstEnergy's Republic Arc-Republic Vineline 138kV Switch Replacement 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 Republic Arc-Republic Vineline 138kV Switch Replacement Project located in the City of Lorain, Lorain 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 9<sup>th</sup> St, Suite 400, Cleveland, OH 44113

C 330.998.0481

[LinkedIn](#) | [TRCcompanies.com](http://TRCcompanies.com)

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.

February 28, 2025

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

**Re: Desktop Assessment for potential hibernaculum for the Republic Arc-Republic Vineline 138kV Switch Replacement Project located in the City of Lorain, Lorain County, Ohio.  
(TRC Project No. 429847.0022.0056)**

To Whom It May Concern,

In response to the Ohio Department of Natural Resources (ODNR), Division of Wildlife's recommendations, TRC Environmental Corporation (TRC) completed a desktop habitat assessment, on behalf of FirstEnergy Corporation, to determine if potential hibernaculum is present within the proposed Republic Arc-Republic Vineline 138kV Switch Replacement (Project) Study Area. The proposed Project is located in the City of Lorain, Lorain County, Ohio (**Appendix A, Figure 1** and **Figure 2**). The proposed Project involves the construction of a new switch at Structure 13278. The proposed Project Study Area occurs within existing, maintained, utility right-of-way (ROW) located within the Ohio Department of Transportation's ROW, in an urban roadway setting (**Appendix A, Figure 3**).

During the recommended desktop habitat assessment, secondary source information was utilized to determine if past or present underground resources were present within 0.25-mile of the Project Study Area. The secondary source information utilized included but was not limited to aerial imagery mapping (Google Earth, 2025), karst topography mapping (ODNR, 2024a) mine data mapping (ODNR, 2024b), and land cover dataset mapping (USGS, 2021).

No historic surface mine, surface industrial mine, underground industrial mine, surface coal mine, and/or abandoned underground coal mine were identified within 0.25 mile of the Project Study Area (**Appendix A, Figure 4a** and **4b**). The nearest historic surface mine is located approximately 1.5 miles southwest of the Project Study Area; the nearest surface industrial mine is 6 miles southwest of the Project Study Area; the nearest underground industrial mine is located approximately 20 miles east of the Project Study Area; the nearest surface coal mine is located 47 miles south of the Project Study Area; and the nearest abandoned underground coal mine is located 33 mile southeast of the Project Study Area. The Project Study Area is not located within a karst region. The nearest karst topographic region is located 24 miles west of the Project Study Area.

In addition, a wetland delineation was conducted by TRC on February 14th, 2025, at which time winter and summer bat habitat was concurrently assessed. Based on the field investigations, no winter or summer bat habitat was identified within the Project Study Area. During the field investigation, photographs of the Project Study Area were taken, which depict the site conditions (**Appendix B**).

No winter or summer bat habitat was identified within the Project Study Area and potential bat hibernaculum is not likely present within 0.25-mile of the Project Study Area; therefore, it is TRC's opinion that federally- or state- listed bats species are not likely to be impacted by this proposed Project. No subsurface disturbance is anticipated as a result of this Project. In addition, no tree clearing is anticipated within the Project Study Area. If minor tree clearing is needed as a result of this Project, it will take place within the USFWS recommended tree clearing dates (October 1-March 31). We kindly request your concurrence that potential bat hibernaculum is not likely present within 0.25-mile of the Project Study Area.

Please do not hesitate to contact me at (330) 998-0481 or via email at [JSlabe@TRCCompanies.com](mailto:JSlabe@TRCCompanies.com) if you have any questions or require additional information.

Regards,

A handwritten signature in black ink, appearing to read "JSlabe", written in a cursive style.

Jenna Slabe  
Ecologist

**Appendices:**

Appendix A: Figures

Figure 1: Site Location Map

Figure 2: Aerial Map

Figure 3: National Land Cover Database Map

Figure 4: Mine/Karst Map

Appendix B: Photographic Record



## References

Google Earth. (2025). Google Earth Images of Project Area. *Date accessed February, 2025.*

ODNR. (2024a). *Karst Interactive Map, ODNR Division of Geological Survey*. Retrieved from ODNR: [https://gis.ohiodnr.gov/website/dgs/karst\\_interactivemap/](https://gis.ohiodnr.gov/website/dgs/karst_interactivemap/)

ODNR. (2024b). *Mines of Ohio, ODNR Division of Mineral Resources*. Retrieved from ODNR: <https://gis.ohiodnr.gov/MapView/?config=OhioMines>

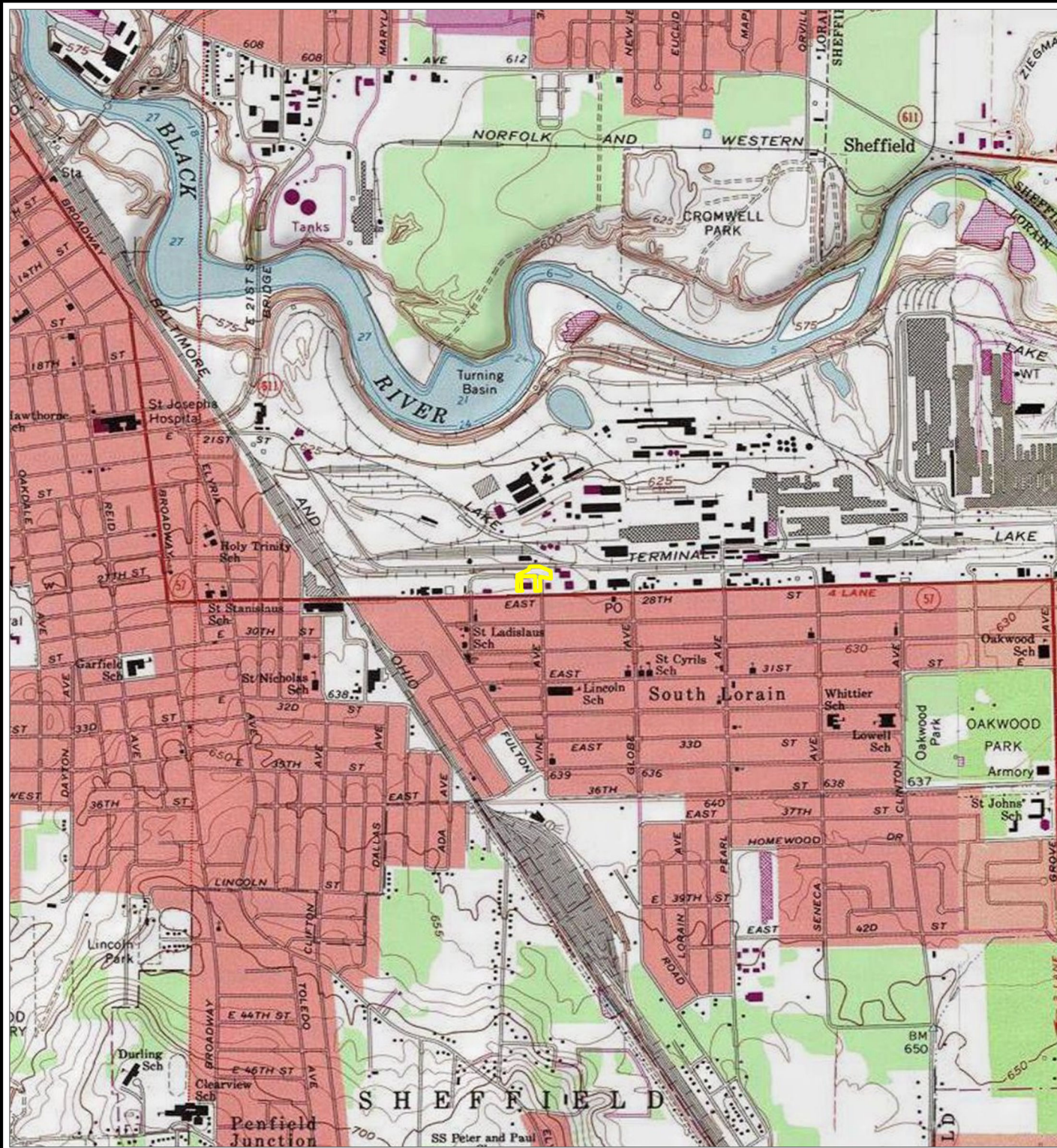
USGS. (2021). *National Land Cover Database*. Retrieved from [https://www.usgs.gov/centers/eros/science/national-land-cover-database?qt-science\\_center\\_objects=0#qt-science\\_center\\_objects](https://www.usgs.gov/centers/eros/science/national-land-cover-database?qt-science_center_objects=0#qt-science_center_objects)

## **APPENDIX A**

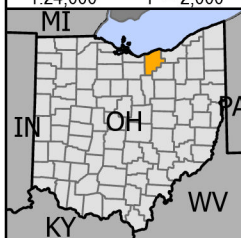
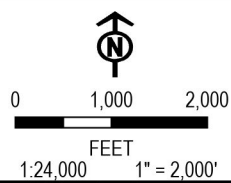
### **Figures**



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 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, LORAIN QUAD

PROJECT: **FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT LORAIN COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL PROJ. NO.: 429847.0022.0056

CHECKED BY: M. MOLNAR

APPROVED BY: B. FALKINBURG

DATE: FEBRUARY 2025

**FIGURE 1**



1382 WEST NINTH STREET  
SUITE 400  
CLEVELAND, OH 44113  
PHONE: 216-344-3072

FILE: HIBERNACULAASSESSMENT



Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
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 PROJECT STUDY AREA

BASE MAP: GOOGLE MAPS.



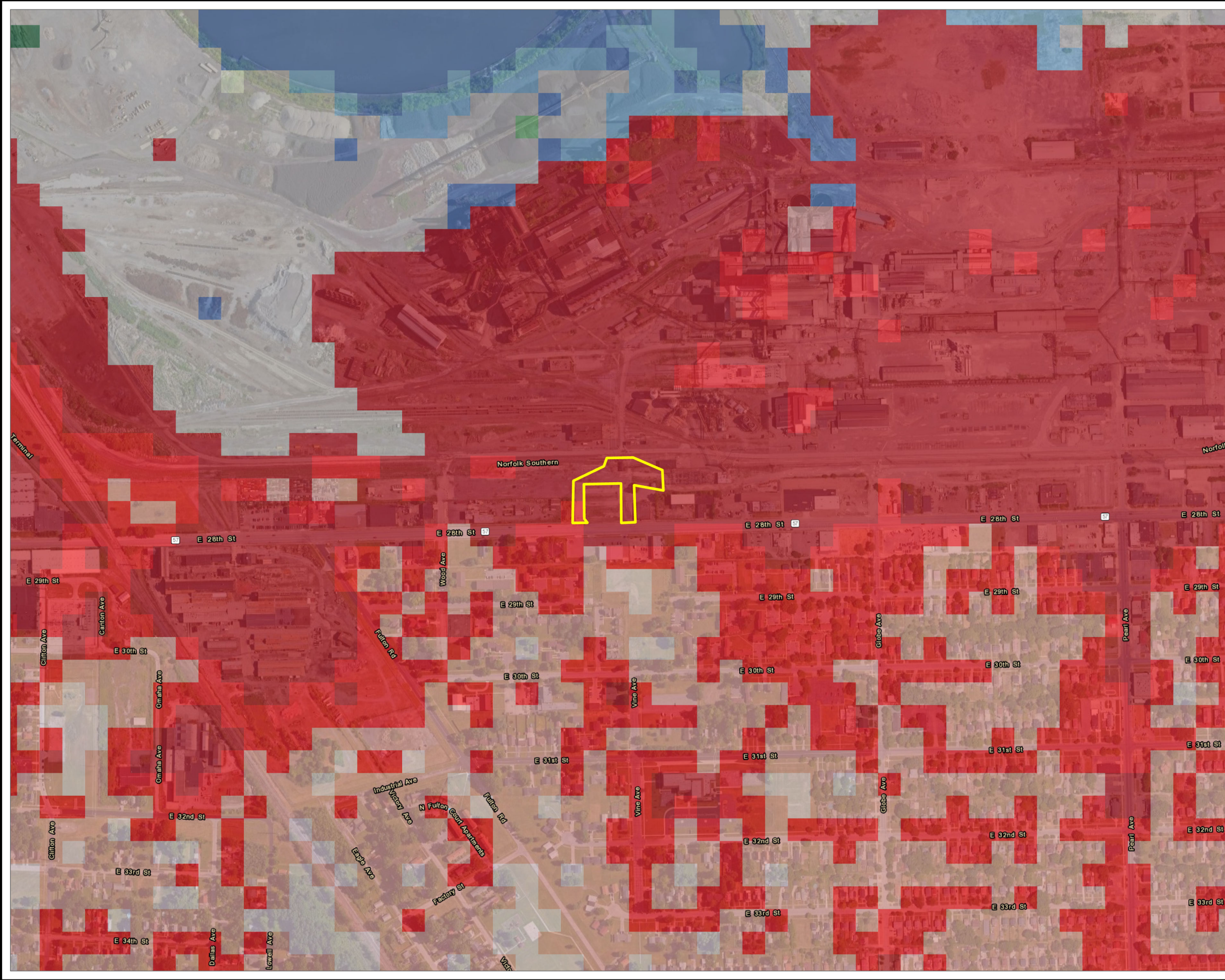
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1" = 100'



PROJECT: <b>FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT</b> <b>LORAIN COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0056
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: FEBRUARY 2025	
 1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	HibemaculaAssessment.aprx

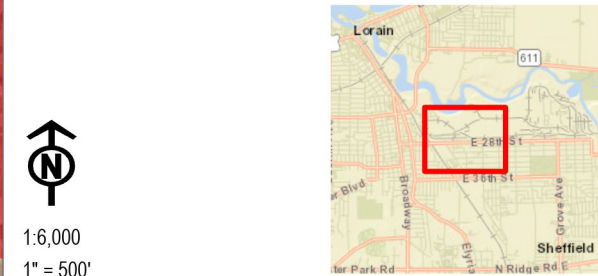


Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
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- PROJECT STUDY AREA
- NLCD LAND COVER CLASSIFICATION
  - BARREN LAND
  - DECIDUOUS FOREST
  - DEVELOPED, HIGH INTENSITY
  - DEVELOPED, LOW INTENSITY
  - DEVELOPED, MEDIUM INTENSITY
  - DEVELOPED, OPEN SPACE
  - EMERGENT HERBACEOUS WETLANDS
  - EVERGREEN FOREST
  - HERBACEOUS
  - OPEN WATER

BASE MAP: GOOGLE MAPS.  
DATA SOURCES: NATIONAL LAND COVER DATABASE (NLCD) 2021 DATA  
ACQUIRED FROM THE USGS.

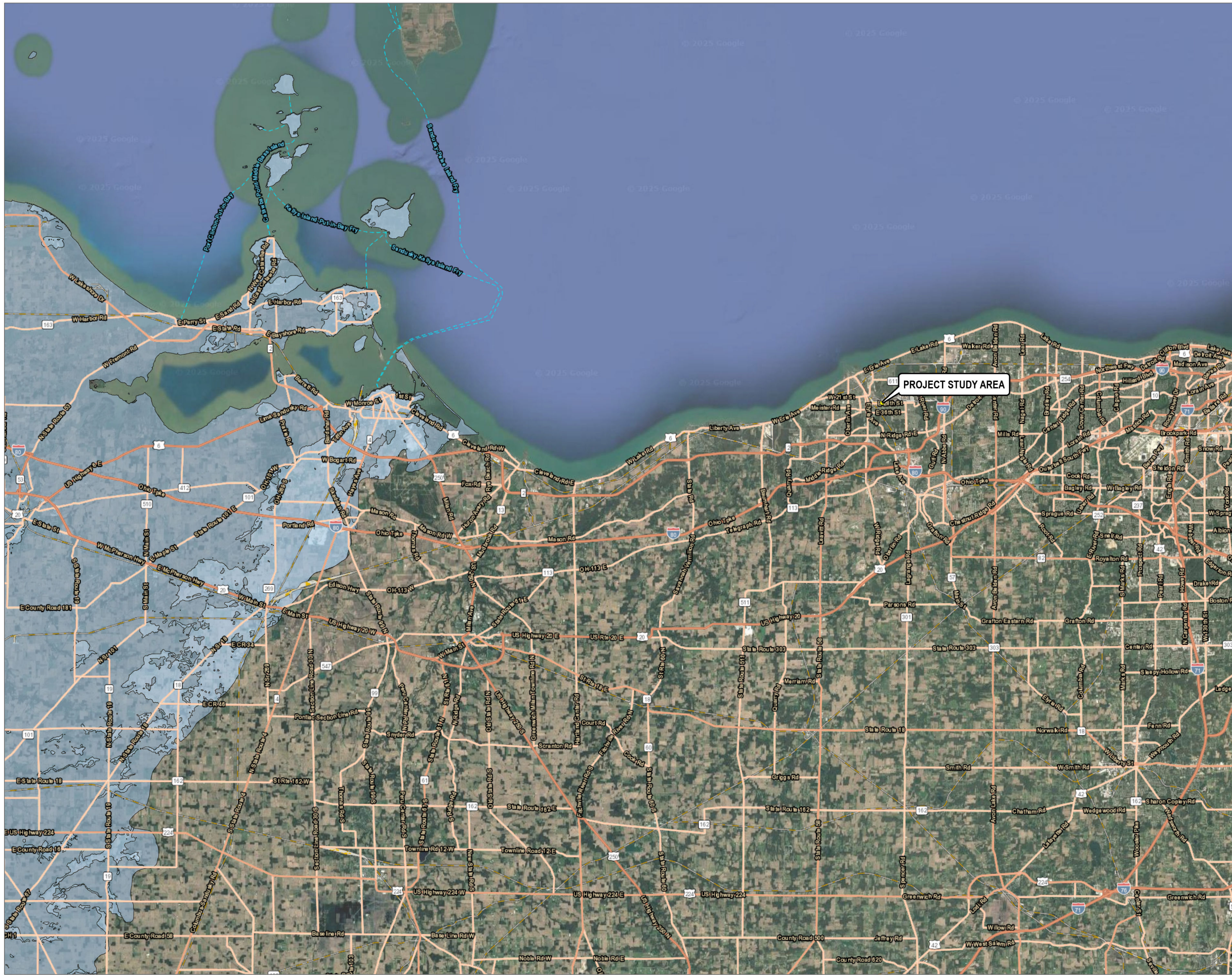


1:6,000  
1" = 500'  
0 500 1,000 FEET

PROJECT: <b>FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT</b> <b>LORAIN COUNTY, OH</b>	
TITLE: <b>NATIONAL LAND COVER DATABASE MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0056
CHECKED BY: M. MOLNAR	<b>FIGURE 3</b>
APPROVED BY: B. FALKINBURG	
DATE: FEBRUARY 2025	
	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	HibermaculaAssessment.aprx

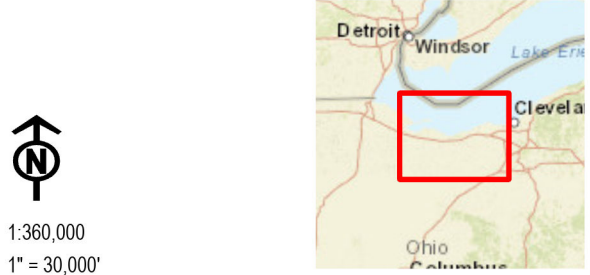


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- PROJECT STUDY AREA
- KARST GEOLOGY
- SILURIAN- AND DEVONIAN-AGE CARBONATE BEDROCK OVERLAIN BY LESS THAN 20 FEET OF GLACIAL DRIFT AND/OR ALLUVIUM
  - SILURIAN- AND DEVONIAN-AGE CARBONATE BEDROCK OVERLAIN BY MORE THAN 20 FEET OF GLACIAL DRIFT AND/OR ALLUVIUM

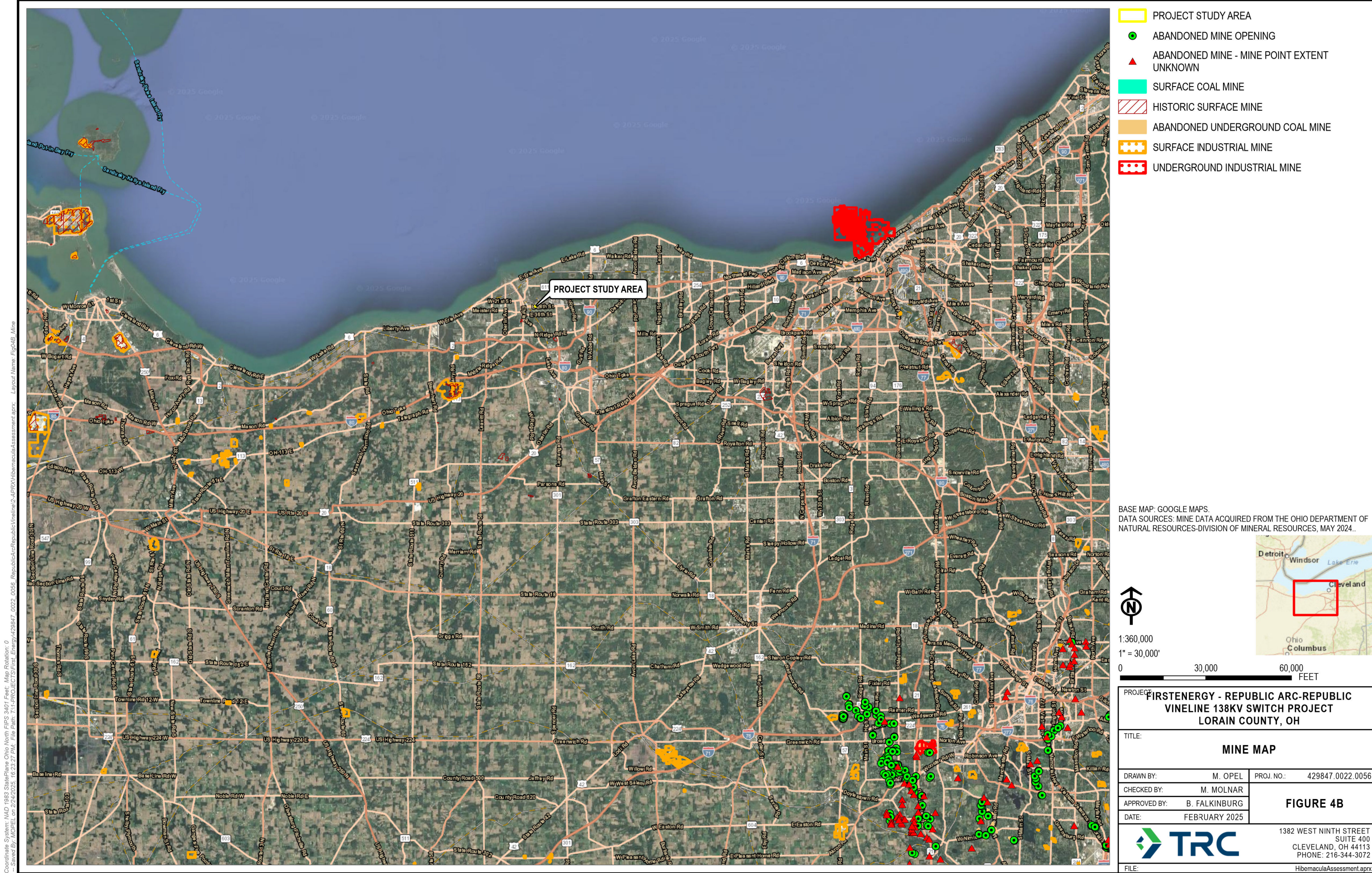
BASE MAP: GOOGLE MAPS.  
DATA SOURCES: KARST DATA ACQUIRED FROM THE OHIO DEPARTMENT OF NATURAL RESOURCES-DIVISION OF GEOLOGICAL SURVEY, MAY 2024.



1:360,000  
1" = 30,000'  
0 30,000 60,000 FEET

PROJECT: <b>FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT</b> <b>LORAIN COUNTY, OH</b>	
TITLE: <b>KARST MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0056
CHECKED BY: M. MOLNAR	<b>FIGURE 4A</b>
APPROVED BY: B. FALKINBURG	
DATE: FEBRUARY 2025	
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FILE:	HibemaculaAssessment.aprx




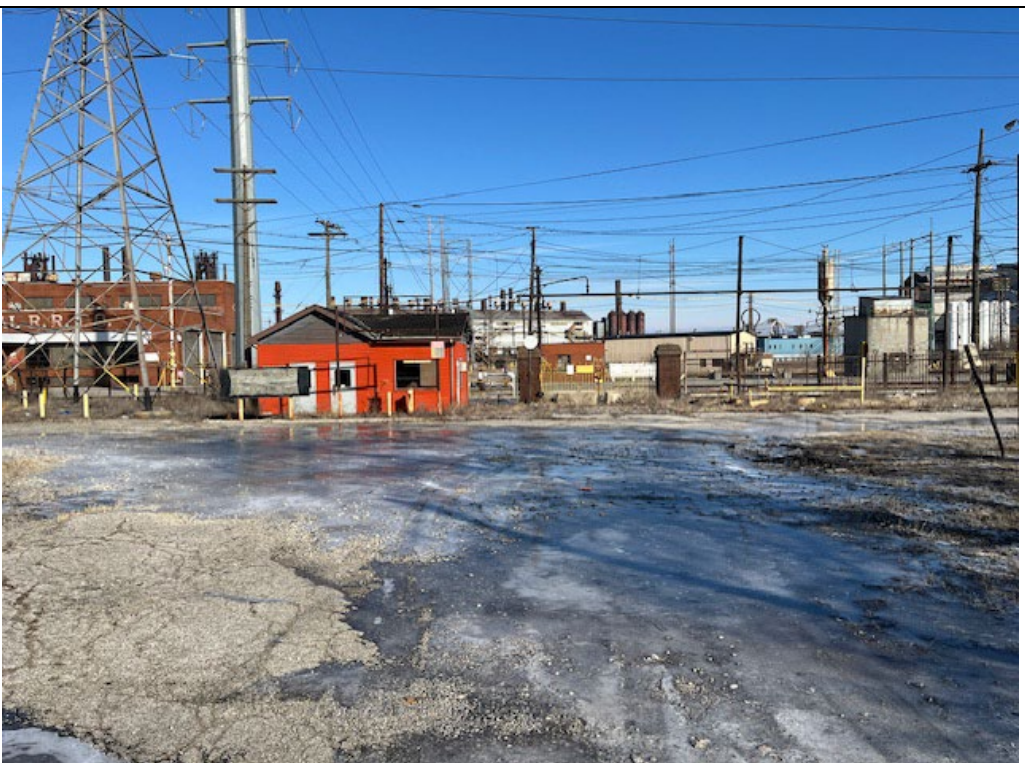




**APPENDIX B**  
**Photographic Record**

<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 1.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing north, viewing the eastern access from East 28 <sup>th</sup> Street.	

<b>Photo No. 2.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing north, viewing the eastern access route.	



<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 3.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing east, viewing eastern portion of the Study Area.	

<b>Photo No. 4.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing west, viewing the existing gravel drive to be used for access/egress.	




<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 5.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing east, viewing the northern portion of the Study Area from the western edge.	

<b>Photo No. 6.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing south, viewing the western extent of the Study Area showing concrete assess drive, looking towards East 28 <sup>th</sup> Street.	



<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 7.</b>		
<b>Date:</b> 02/14/2025		
<b>Description:</b>  Facing north, viewing the western portion of the Study Area from East 28 <sup>th</sup> Street.		

<b>Photo No. 8.</b>		
<b>Date:</b> 02/14/2025		
<b>Description:</b>  Facing northeast, viewing the structures within the Study Area.		



## 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



January 27, 2025

Project Code: 2025-0040967

Dear Ms. Given:

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 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, location, and the proposed implementation of seasonal tree cutting (clearing of trees  $\geq 3$  inches diameter at breast height between October 1 and March 31) to avoid impacts to the endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*), and the proposed endangered tricolored bat (*Perimyotis subflavus*) 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.

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](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.

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](mailto: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](mailto:ohio@fws.gov).

Sincerely,

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

Erin Knoll  
Field Office Supervisor





1382 W Ninth St., Suite 400  
Cleveland, OH 44113

T 216.344.3072  
TRCcompanies.com

January 24, 2025

Patrice Ashfield  
Field Office Supervisor  
U.S. Fish and Wildlife Service  
4625 Morse Road, Suite 104  
Columbus, OH, 43230

**Request for Submittal Review (IPaC Project Code: 2025-0040967) regarding the Republic Arc-Republic Vineline 138 kV Switch Replacement Project located in Sheffield Township, Lorain County, Ohio. (TRC Project No. 429847.0022.0056)**

Dear Ms. Ashfield,

On behalf of the FirstEnergy Corporation (FirstEnergy), TRC Environmental Corporation (TRC) is requesting Technical Assistance regarding the proposed Republic Arc-Republic Vineline 138 kV Switch Replacement Project (Project) located in Sheffield Township, Lorain County, Ohio (**Figure 1: Site Location Map**). We are requesting information regarding Threatened and Endangered (T&E) species, or their habitats that may be impacted by the proposed Project, as well as information regarding, known locations of any known bald eagle nests, bat capture records, and bat hibernacula within a 5-mile radius of the proposed Project.

**Project Location (latitude/longitude):**

Centroid: 41.446094, -82.146594

**County:** Lorain

**Project Description:** The proposed Project involves the construction of a new switch at Structure 13278. The proposed Project Study Area is approximately 1.70 acres, located in Sheffield Township, Lorain County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (**Figure 2: Aerial Map**) is comprised of an existing, maintained, utility right-of-way (ROW) located within ODOT's ROW in an urban roadway setting. Currently as proposed, tree clearing is anticipated within the Project Study Area. No tree clearing is anticipated within the Project Study Area.

**On-site Habitat Description:** Based on available desktop resources, TRC has identified the following habitats within the Project Study Area:

Land Use: Existing, maintained utility ROW located within an urban roadway corridor.

Wetlands: The proposed Project Study Area does not include any National Wetlands Inventory (NWI) wetlands within the proposed project limits. A surface water delineation will be performed prior to construction of the proposed Project to determine the presence/absence of wetlands.

Streams: The proposed Project Study Area does not include any National Hydrography Dataset (NHD) streams. A surface water delineation will be performed prior to construction of the proposed Project. In-stream work is not anticipated as a result of this Project.

Forested Area: The proposed Project Study Area contains no forested habitat. No tree clearing is anticipated within the Project Study Area.

Uplands: The proposed Project Study Area includes upland habitat within the existing utility ROW located on industrial land.

Floodplains: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panel 39093C0109E (eff. 3/9/2021), the proposed Project is not located within a FEMA-mapped 100-Year Flood Zone.

**Potential Disturbance:** It is anticipated that due to the nature of the Project, jurisdictional resources will not be impacted by the proposed Project activities. Avoidance and minimization will be utilized during construction. If wetlands and streams cannot be avoided, timber matting will be utilized during construction for any temporary impacts. The most current Best Management Practices will be followed during construction and disturbed areas will be restored to pre-construction

conditions as much as applicable. No tree-clearing is anticipated within the Project Study Area. However, if minor tree clearing is needed as a result of this Project; it will take place within the USFWS recommended tree clearing dates (October 1 – March 31).

Please do not hesitate to contact me at (330) 446-0265 or via email at [EGiven@TRCCompanies.com](mailto:EGiven@TRCCompanies.com) if you have any questions or require additional information.

Regards,



Emma Given, PhD  
Ecologist

Attachments:

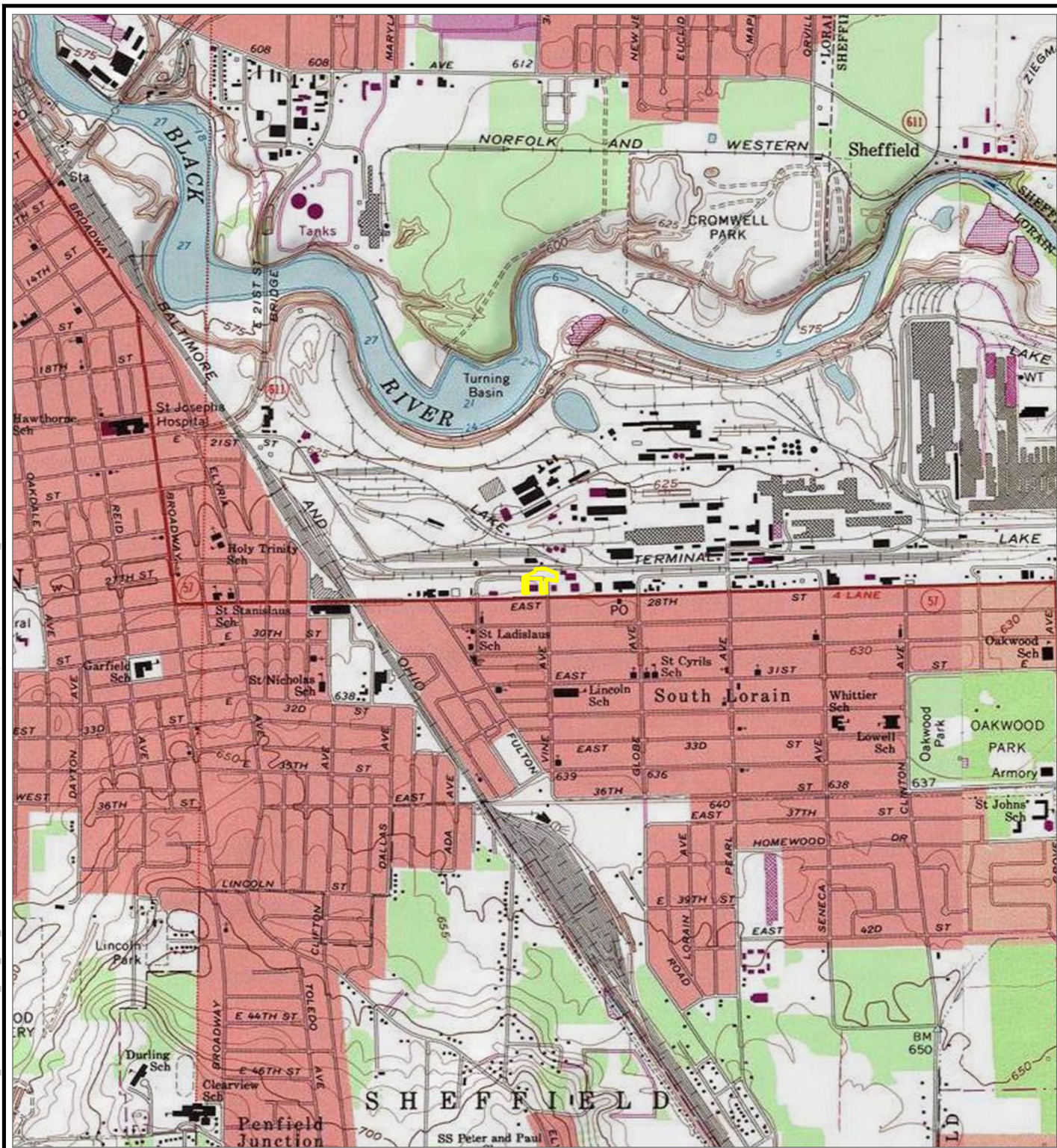
Figure 1: Site Location Map

Figure 2: Aerial Map

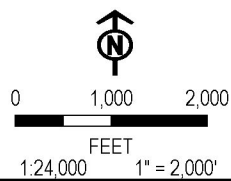
USFWS IPaC Official Species List



COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH FIPS 3401 FEET, MAP ROTATION: 0  
-- SAVED BY: MOPEL ON 1/10/2025, 11:46:20 AM, FILE PATH: T:\N-PROJECTS\FIRST ENERGY\429847\_0022\_0056, REPUBLICARC\REPUBLIC VINELINE\2-APR\XWD\R APPX, LAYOUT NAME: FIG01\_SLM



 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, LORAIN QUAD

PROJECT: **FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT**  
**LORAIN COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL PROJ. NO.: 429847.0022.0056

CHECKED BY: M. MOLNAR

APPROVED BY: B. FALKINBURG

DATE: JANUARY 2025

**FIGURE 1**



1382 WEST NINTH STREET  
SUITE 400  
CLEVELAND, OH 44113  
PHONE: 216-344-3072

FILE: WDR



Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
-- Saved By: MOPEL on 1/23/2025, 14:17:10 PM. File Path: T:\1-PROJECTS\First\_Energy\429847\_0022\_0056\_RepublicArcRepublicVineline12-APRX\WDR.aprx. Layout Name: Fig02\_Aerial



PROJECT STUDY AREA

EXISTING STRUCTURE


BASE MAP: GOOGLE MAPS.



1:1,200  
1" = 100'

0 100 200 FEET



PROJECT: <b>FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT</b> LORAIN COUNTY, OH			
TITLE: <b>AERIAL MAP</b>			
DRAWN BY:	M. OPEL	PROJ. NO.:	429847.0022.0056
CHECKED BY:	M. MOLNAR	<b>FIGURE 2</b>	
APPROVED BY:	B. FALKINBURG		
DATE:	JANUARY 2025		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:		WDR.aprx	





## 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:

01/24/2025 13:37:32 UTC

Project Code: 2025-0040967

Project Name: Republic Arc-Republic Vineline 138 kV Switch Replacement 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

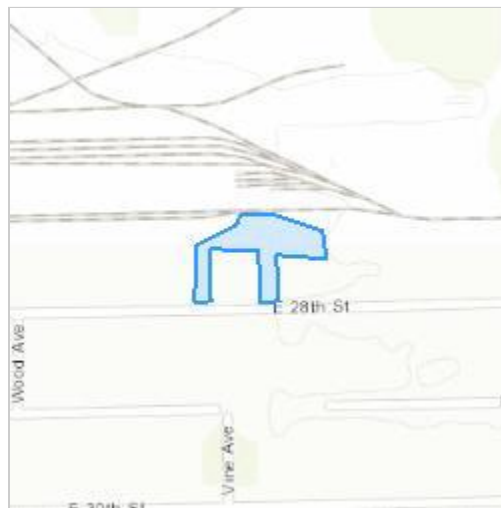
(614) 416-8993

## PROJECT SUMMARY

Project Code: 2025-0040967  
Project Name: Republic Arc-Republic Vineline 138 kV Switch Replacement Project  
Project Type: Transmission Line - Maintenance/Modification - Above Ground  
Project Description: Republic Arc-Republic Vineline 138 kV Switch Replacement Project (Project) is located in Sheffield Township, Lorain County, Ohio. The Project Study Area is 1.70 acres in size. The proposed Project involves the construction of a new switch at Structure 13278.

### Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@41.44588255,-82.14611216136711,14z>



Counties: Lorain County, Ohio



## ENDANGERED SPECIES ACT SPECIES

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

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, 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 <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered

## BIRDS

NAME	STATUS
Rufa Red Knot <i>Calidris canutus rufa</i> There is <b>proposed</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/1864">https://ecos.fws.gov/ecp/species/1864</a>	Threatened

## CLAMS

NAME	STATUS
Round Hickorynut <i>Obovaria subrotunda</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/9879">https://ecos.fws.gov/ecp/species/9879</a>	Threatened

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is <b>proposed</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	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: William Haas  
Address: 1382 W 9th St  
Address Line 2: Suite 400  
City: Cleveland  
State: OH  
Zip: 44113  
Email: [whaas@trccompanies.com](mailto:whaas@trccompanies.com)  
Phone: 3308147538

**Stolarski, Adrianna**

**From:** Falkinburg, Brad <BFalkinburg@trccompanies.com>  
**Sent:** Friday, February 14, 2025 4:28 PM  
**To:** Stolarski, Adrianna; Molnar, Maggie  
**Subject:** [EXTERNAL] RE: Republic Arc-Republic Vineline - Field Summary  
**Attachments:** Photolog\_Republic Arc-Republic Vineline 138kV.pdf; Fig02\_Aerial\_Republic Arc-Republic Vineline 138kV.pdf

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

Hello Adrianna,

On February 14, 2025, TRC biologists conducted a wetland and waterways delineation for the Republic Arc-Republic Vineline 138 kV Switch Replacement Project (Project) located in the City of Lorain, Lorain County, Ohio. The Project Study Area is 1.70 acres in size. The proposed Project involves the construction of a new switch at Structure 13278. Land use within the Project Study Area was observed to be an existing, maintained, utility right-of-way (ROW) located within an urban/industrial setting. No wetlands or streams were observed within the Project Study Area during the field survey and no other ecological resources were observed within the Project Study Area. See the attached Aerial Map and photographic record documenting the Project Study Area.

Regards,

**Brad Falkinburg, PWS**

Ecological Office Practice Leader  
Ohio and West Virginia Area Manager



1382 W 9<sup>th</sup> St, Suite 400, Cleveland, OH 44113  
C 440.666.2890 | [BFalkinburg@trccompanies.com](mailto:BFalkinburg@trccompanies.com)  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](http://TRCcompanies.com)

---

**From:** Stolarski, Adrianna <astolarski@firstenergycorp.com>  
**Sent:** Thursday, February 13, 2025 3:26 PM  
**To:** Molnar, Maggie <MMolnar@trccompanies.com>  
**Cc:** Falkinburg, Brad <BFalkinburg@trccompanies.com>  
**Subject:** RE: [EXTERNAL] Republic Vine


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


**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Hi Maggie,



<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 1.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing north, viewing the eastern access from East 28 <sup>th</sup> Street.	

<b>Photo No. 2.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing north, viewing the eastern access route.	



<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 3.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing east, viewing eastern portion of the Study Area.	

<b>Photo No. 4.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing west, viewing the existing gravel drive to be used for access/egress.	




<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 5.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing east, viewing the northern portion of the Study Area from the western edge.	

<b>Photo No. 6.</b>	
<b>Date:</b> 02/14/2025	
<b>Description:</b>  Facing south, viewing the western extent of the Study Area showing concrete assess drive, looking towards East 28 <sup>th</sup> Street.	



<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Lorain, Lorain County, Ohio	<b>Project No.</b> 429847.0022.0056
--	--	--

<b>Photo No. 7.</b>		
<b>Date:</b> 02/14/2025		
<b>Description:</b>  Facing north, viewing the western portion of the Study Area from East 28 <sup>th</sup> Street.		

<b>Photo No. 8.</b>		
<b>Date:</b> 02/14/2025		
<b>Description:</b>  Facing northeast, viewing the structures within the Study Area.		



Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
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PROJECT STUDY AREA

EXISTING STRUCTURE


BASE MAP: GOOGLE MAPS.



1:1,200  
1" = 100'

0 100 200 FEET



PROJECT: <b>FIRSTENERGY - REPUBLIC ARC-REPUBLIC VINELINE 138KV SWITCH PROJECT</b> LORAIN COUNTY, OH			
TITLE: <b>AERIAL MAP</b>			
DRAWN BY:	M. OPEL	PROJ. NO.:	429847.0022.0056
CHECKED BY:	M. MOLNAR	<b>FIGURE 2</b>	
APPROVED BY:	B. FALKINBURG		
DATE:	JANUARY 2025		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:		WDR.aprx	