

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

CONSTRUCTION NOTICE

**CHRYSLER-DOWLING 138 KV TRANSMISSION LINE
SWITCH REPLACEMENT PROJECT
OPSB CASE NO.: 25-0515-EL-BNR**

June 18, 2025

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

CONSTRUCTION NOTICE
CHRYSLER-DOWLING 138 kV TRANSMISSION LINE SWITCH REPLACEMENT
PROJECT

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

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05 (B)(1): Name and Reference Number

Name of Project: Chrysler-Dowling 138 kV Transmission Line Switch Replacement (“Project”)

Reference Number: 3012-1

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

American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, is proposing to replace two existing switches on the existing Chrysler-Dowling 138 kV Transmission Line. The existing switches, Nos. A-13109 and A-13110 are currently mounted on the same structure, Structure No. 91-3, that serves as the transmission line tap structure to Lime City Substation. These switches will be replaced and installed on two (2) new single circuit steel monopole switch structures on concrete foundations, one on each side of Structure No. 91-3, which will be a modified tap structure. The new switch numbers will be A-747 and A-748. In addition to the new switches and switch structures, a midspan structure on a concrete foundation will be installed on the 138 kV transmission line tap to the Lime City Substation. The existing conductors and static wires will be transferred to the new structures.

The Project is in Perrysburg Township, Wood County, Ohio. The general location of the proposed Project is shown in Exhibits 1, a partial copy of a United States Geologic Survey

(“USGS”) Topographic Map, Wood County, Ohio Quad Map. Exhibit 2 provides a partial copy of ESRI aerial imagery. The general layout is shown in Exhibit 3.

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

The Project meets the requirements for a Construction Notice application because the Project is within the types of projects defined by Item (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 replacing structures with a different type of structure for a distance of less than 2 miles.

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

The existing Chrysler-Dowling 138 kV Transmission Line air switches, A-13109 and A-13110, are 2-way switches that are obsolete, of a design that no longer meets present standards and is no longer supported for repair parts. Switch A-13110 is presently inoperable, left in the closed position. This 2-way, phase-over-phase design is obsolete and no longer meets present standards because it is impractical to maintain or repair. The last cyclic maintenance for both switches occurred in 2020. However, several unscheduled maintenance visits have occurred since then to re-tune the jaw-blade assembly and operational linkage. These 2-way switches are mounted to a single steel pole, also serving as the tap point to Lime City Substation, further complicating maintenance without forcing an outage to customers. Consultation with Engineering and Regional Operations, the combination of unavailability of parts, operational history, and continued wear on critical

components in structural integrity, all indicate that attempts to repair the switch and to prolong service would be temporary in nature or unsuccessful. The proposed solution is to relocate and replace both switches and motor operators to new, mid-span structures, using an improved unitized design meeting present engineering standards. The existing switch pole will be reframed and continue service as the tap point.

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

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2025 Long-Term Forecast Report. This map was submitted to the PUCO in Case No. 25-0504-EL-FOR under Adm.Code 4901:5-5:04 (C)(2)(b). The map is incorporated by reference only. The Project is not included in ATSI's LTFR filed in 2025 because the Project does not entail any topology or rating change. The general location and layout of the Project area is shown in Exhibits 1 and 2.

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

Two alternatives were considered as part of this Project. The first alternative considered was to continue to maintain and repair the existing switches. This alternative was not chosen because the manufacturer no longer supplies repair parts for the switches, thus requiring any replacement parts for repair to be fabricated (leading to long lead time and vulnerability to failure). The second alternative considered was to remove the switches without replacing them. This option was rejected due to an unacceptable sectionalizing scheme that would result.

4906-6-05 (B)(5): Public Information Program

ATSI's manager of External Affairs will advise local officials of features and the status of the proposed Project as necessary. ATSI will maintain a Project website and will continue to work with property owners concerning the proposed Project. The website address is below:

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

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

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

The construction schedule for this Project is expected to begin as early as October 6, 2025, and to be completed by December 31, 2025.

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

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

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

The Project is located entirely within existing right-of-way on parcels P57-400-136403026000 and P57-400-136401007000 (owned by Toledo Edison), P57-400-136000920200 (owned by New York Central LLC) and P57-400-136402023000 (owned by Maumee Stone Company). No new Easements will be required for this Project.

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

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

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

Voltage:	138 kV
Conductors:	954 kmil 37 Str. AAC (Existing conductors) 336 kmil 26/7 ACSR (Existing Tap conductor)
Static Wire:	7#10 Alumoweld (Existing static wire) 3#6 Alumoweld (Existing Tap static wire)
Insulators:	Porcelain
ROW Width:	60-100 feet
Structure Types:	Exhibit 4 – 138 kV SC Steel Pole 2000 Amp Switch Structure (Qty. 2) Exhibit 5 – 138 kV SC Steel Pole DE Structure (Qty. 1)

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

There is one (1) occupied residence or institution within 100 feet from the edge of right-of-way containing the single circuit Chrysler-Dowling 138 kV Transmission Line. The occupied residence or institution is approximately 40 feet from the edge of right-of-way containing the proposed Project. Therefore, Electric and Magnetic Field (“EMF”) calculations are provided below. It should be noted that there is no change expected in any EMF due to the construction of the Project as compared to existing conditions.

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

Table 1 itemizes the line loading of the Chrysler-Dowling 138 kV Transmission Line. The normal line loading represents FirstEnergy’s peak system load for the transmission lines. The emergency line loading represents the maximum line loading under contingency operation. The winter rating is based on the continuous maximum conductor rating (“MCR”) of the circuits for the single conductors per phase and an ambient temperature of 0 °C (32 °F), wind speed of 1.3 miles per hour, and a circuit design operating temperature of 100 °C (212 °F).

Table 1: Transmission Line Loading

Line Name	Normal Loading Amps	Emergency Loading Amps	Winter Rating Amps
Chrysler-Dowling 138 kV Transmission Line	161.8	161.8	1786.5

Table 2 provides an approximation of the magnetic and electric fields strengths within the right-of-way containing the Chrysler-Dowling 138 kV Transmission Line for the structural configuration found in the Project. The configuration is tangent structure to tangent structure. The configuration is calculated in a 60-foot-wide right-of-way. The calculations provide an approximation of the electric and magnetic fields levels based on specific assumptions utilizing the EPRI EMF Workstation 2015 program software. This program software assumes the input transmission line configuration is located on flat terrain. Also, a balanced, three-phase circuit loading is assumed for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission lines.

Table 2: EMF Calculations for Chrysler-Dowling 138 kV Transmission Line within 60-foot ROW:

Chrysler-Dowling 138 kV Transmission Line: Tangent Structure to Tangent Structure		Electric Field (kV/m)	Magnetic Field (mG)
Normal Loading	Under Lowest Conductors	3.026	31.94
	At Right-of-Way Edges	0.403 / 0.425	12.11 / 13.15
Emergency Loading	Under Lowest Conductors	3.026	31.94
	At Right-of-Way Edges	0.403 / 0.425	12.11 / 13.15
Winter Rating	Under Lowest Conductors	3.026	352.72
	At Right-of-Way Edges	0.403 / 0.425	133.72 / 141

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

ATSI designs its facilities according to the requirements of the National Electrical Safety Code (“NESC”). The pole heights and configuration were chosen based on NESC specifications, engineering parameters, and cost. ATSI’s typical practice, as proposed in this Project, is to maintain the existing configuration of the single circuit steel monopole tangent structures – a compact design that reduces EMF field strengths in comparison to other installations.

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

The estimated cost for the proposed Project is \$836,00. 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 Perrysburg Township, Wood County, Ohio. The Project area is in industrial/residential area. No significant changes or impacts to the current or future land use are anticipated.

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

Agricultural land does not exist within the Project's Area of Potential Effect ("APE").

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

As part of the investigation for this Construction Notice, on March 10, 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 April 7, 2025, SHPO replied to the request and the response is attached as Exhibit 6. SHPO concurred that the Project, as proposed, will not affect any historic properties or cultural resources. No further coordination is required unless the scope of work changes or new/additional archaeological deposits are discovered during construction.

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

There are 23 above-ground historic resources that have not yet been evaluated for NRHP eligibility located within one (1)-mile of the Project Study Area. The nearest of these structures is situated 85 feet (ft) to the southeast extent of the Project Study Area.

Three (3) archaeological surveys and one (1) archaeological literature review survey have been conducted within one (1) mile of the proposed Project. The literature review survey overlaps the majority of the Project Study Area. From these surveys, and the efforts of local informants, nine (9) archaeological sites are recorded within one (1)-mile. The sites include five (5) historic period open sites, two (2) pre-contact open sites, and two (2) pre-contact

isolated finds. The nearest of the nine (9) sites is located 340 ft to the west of the southern Project extent.

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 any intact, significant archaeological resources. The Project will have no adverse effect upon any cultural or archaeological resources. The Project ground disturbance is limited to mid-span structure installation. To date, TRC has not conducted any on-site cultural resources surveys.

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

In case overweight hauling is required for this Project, coordination with Wood County and Perrysburg Township will be initiated to confirm the need for any special hauling permits and/or Road Use Maintenance Agreements (RUMA). Less than 1-acre of earth disturbance is proposed for the Project, therefore submittal of a Notice of Intent (NOI) application with the Ohio EPA is not required for coverage under the general construction stormwater permit (OHC000006). A Storm Water Pollution Prevention Plan (SWPPP) is also not required to be submitted for review by Wood County Soil & Water Conservation District unless future changes to the Project scope require over 1 acre of earth disturbance. The Project, as proposed, is not located within a 100-year floodplain; therefore, coordination is not required with the local floodplain administrator. The Project Study Area crosses a CSX railroad and will require coordination with the railroad company, if access is deemed necessary. All permitting and/or coordination necessary to comply with local, state, and federal agencies with jurisdiction regarding this Project will be completed prior to the commencement of construction.

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 March 20, 2025, stated that there are no records of state and/or federally listed plants or animals located within one (1) mile of the Project Study Area. However, the Project is within the range of nine (9) state and/or federally listed animal species. 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 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. These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, and cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost trees. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed for ATSI and submitted to ODNR for concurrence on March 31, 2025. ODNR responded on April 1, 2025, attached as Exhibit 7A, concurring that no caves, cliffs, or mine openings occur in the Project Area, therefore, the Project is not likely to impact hibernating bats. In assessing compliance with NWP General Condition 18, TRC determined that tree clearing is not 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); therefore, no impacts to bat species are anticipated as a result of the construction of this Project.

The Project is within the range of the pondhorn (*Uniomerus tetralasmus*), a state threatened mussel species. Due to the location, and that there is no in-water work proposed in a perennial stream, this Project will not impact this species.

The Project is within the range of the western banded killifish (*Fundulus diaphanatus menona*), a state endangered fish, and the greater redhorse (*Moxostoma valenciennesi*), a state threatened fish. Due to the location, and that there is no in-water work proposed in a perennial stream, this Project will not impact these species.

The Project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet meadows and other wetlands. Due to the location, the type of habitat within the Project Study Area, and the type of work proposed, the Project will not 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 Study Area, and the type of work proposed, this Project will not impact this species.

As part of the investigation, TRC submitted a request to the US Fish and Wildlife Service (USFWS) for an Ecological Review to research the presence of any endangered, threatened, rare, or designated species within the Project Study Area. A copy of USFWS' Ecological Review response, dated March 3, 2025, is included as Exhibit 8. The response states that due to the Project, type, size, location and the proposed implementation of seasonal tree cutting, USFWS does not anticipate adverse effects to any federally endangered, threatened, or proposed species or proposed or designated critical habitat.

A list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in Table 3.

Table 3. List of Endangered and Threatened Species within range of Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Mammals				
Indiana Bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Little Brown Bat	<i>Myotis lucifugus</i>	N/A	Endangered	Trees, forests, caves, and caverns.
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Endangered	Trees, forests, caves, and caverns.
Mussels				
Pondhorn	<i>Unio merus tetralasmus</i>	N/A	Threatened	Perennial streams.

Fish				
Western Banded Killifish	<i>Fundulus diaphanatus menona</i>	N/A	Endangered	Perennial streams.
Greater Redhorse	<i>Moxostoma valenciennesi</i>	N/A	Threatened	Perennial streams.
Reptiles				
Kirtland's snake	<i>Clonophis kirtlandii</i>	N/A	Threatened	Wet meadows and other wetlands.
Spotted Turtle	<i>Clemmys guttata</i>	N/A	Threatened	Fens, bogs and marshes, wet prairies, meadows, wet woods and pond edges.

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. The Project Study Area is 1.812 acres, located in Perrysburg Township, Wood County, Ohio. No features were identified and delineated within the Project Study Area, as shown in Exhibit 9. To verify the absence of wetlands within the Project Study Area, an upland data point (U-EVN-1) was collected.

The Project Study Area consists mainly of an existing, maintained utility and railroad ROW and substation facility. TRC did not observe the presence of any of the ODNR or federally listed species during the field investigation due to the highly maintained nature of the utility ROW and existing facility.

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

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

Construction and operation of the proposed Project will be in accordance with the requirements specified in the latest revision of the National Electrical Safety Code as

adopted by the PUCO and will meet all applicable safety standards established by the Occupational Safety and Health Administration.

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

4906-6-07: Documentation of Construction Notice Application Transmittal and Availability for Public Review

This Construction Notice application is being provided concurrently to the following public officials from Perrysburg Township and Wood County.

Wood County

Mr. Craig LaHote, President
Board of County Commissioners
One Courthouse Square, 5th Floor
Bowling Green, OH 43402

Commissioners@woodcountyohio.gov

Dr. Theodore Bowlus,
Vice President
Board of County Commissioners
One Courthouse Square, 5th Floor
Bowling Green, OH 43402

Commissioners@woodcountyohio.gov

Doris I. Herringshaw, Ed.D.,
Board of County Commissioners
One Courthouse Square, 5th Floor
Bowling Green, OH 43402

Commissioners@woodcountyohio.gov

John M. Musteric, P.E., P.S.
Wood County Engineer's Office
One Courthouse Square, 5th Floor
Bowling Green, OH 43402

engineer@woodcountyohio.gov

Mr. Dave Steiner, Director
Wood County Planning Commission
One Courthouse Square, 5th Floor
Bowling Green, OH 43402

wsteiner@woodcountyohio.gov

Mr. Jim Carter, District Admin.
Wood County Soil & Water District
1616 E. Wooster Street, Suite 32
Bowling Green, OH 43402

jimcarter@woodswcd.com

Perrysburg Township

Mr. Gary Britten, Trustee
Perrysburg Township
10960 Roachton Road
Perrysburg, OH 43551

Brittencattlesource@hotmail.com

Mr. Robert Mack, Trustee
Perrysburg Township
30195 Morningside Drive
Perrysburg, OH 43551

RPMack@buckeye-express.com

Mr. Joseph Schaller, Trustee
Perrysburg Township
27840 Glenwood
Perrysburg, OH 43551
jschaller@perrysburgtownship.us

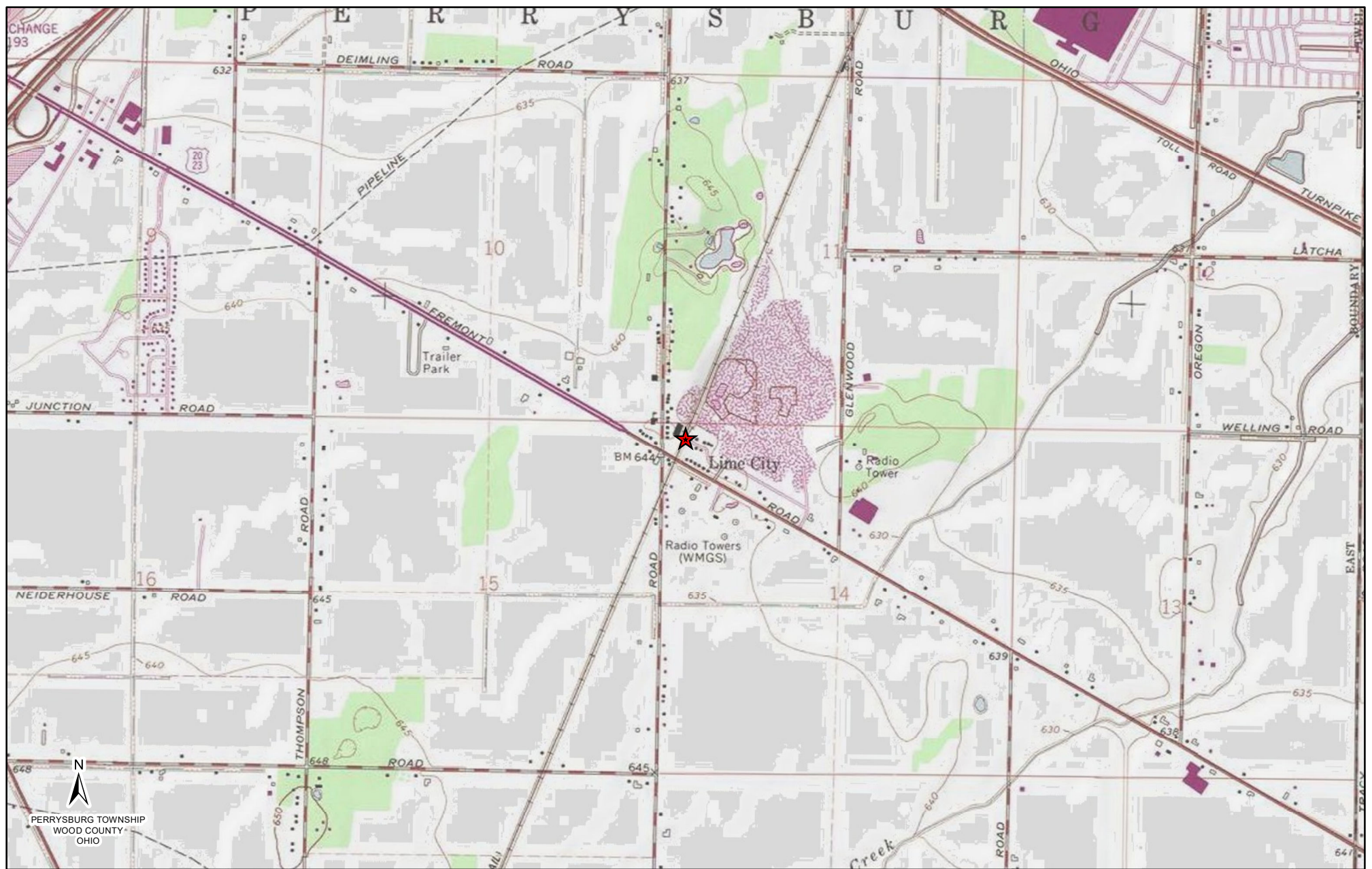
Ms. Gretchen Welch,
Fiscal Officer
Perrysburg Township
29096 Belmont Farm Road
Perrysburg, OH 43551
gwelch@perrysburgtownship.us

Library

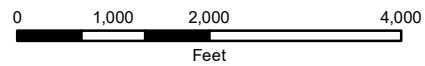
Ms. Janel Haas, Director
Way Public Library
101 E Indiana Avenue,
Perrysburg, OH 43551
Janel.Haas@waylibrary.info

Per Adm.Code 4906-6-07(B), exemplar copies of the notice letters sent to local government officials and to the library have been included with this application as proof of compliance with requirements of Adm.Code 4906-6-07(A)(1) and 4906-6-07(A)(2).

Information is posted at www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Construction Notice application. The link to this website is being provided in accordance with Adm.Code 4906-6-07(B), which requires ATSI to provide the OPSB with proof of compliance with Adm.Code 4906-6-07(A)(3).



N
PERRY TOWNSHIP
WOOD COUNTY
OHIO



Reference:

USGS Topographical Overlay

Coordinate System:

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



EXHIBIT 1

ATSI[®]

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

Chrysler-Dowling 138 kV Transmission Line Switch Replacement Project

LEGEND:

★ Project Location



N
PERRYSBURG TOWNSHIP
WOOD COUNTY
OHIO

LEGEND:

★ Project Location

0 1,000 2,000 4,000
Feet

Reference:

ESRI Image, ODOT

Coordinate System:

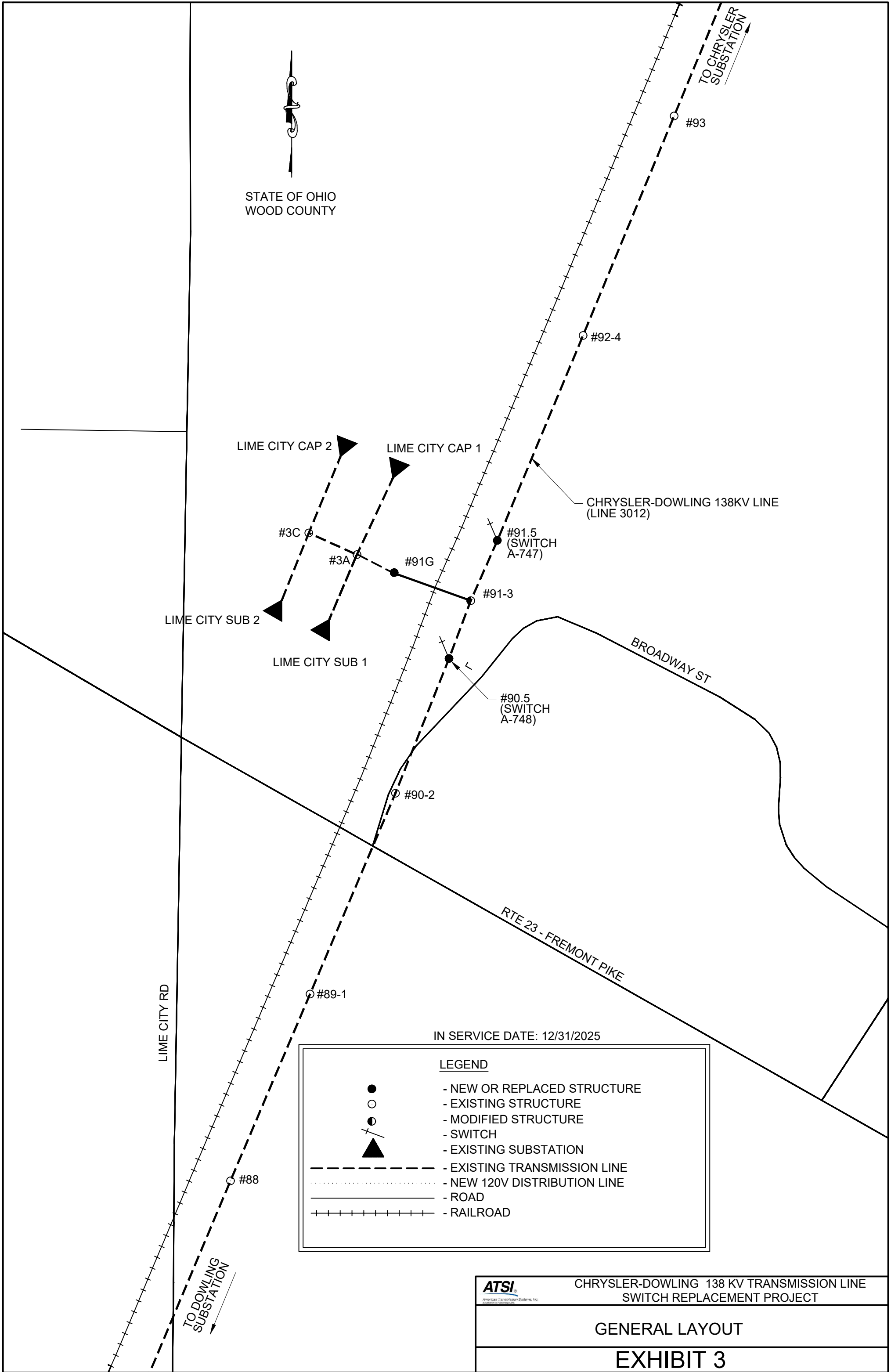
NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US



EXHIBIT 2

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

**Chrysler-Dowling 138 kV Transmission Line
Switch Replacement Project**



PAPER SIZE: 8.5X11

96'-4-1/2"

22'-6"

16'-0"

16'-0"

GROUND LINE

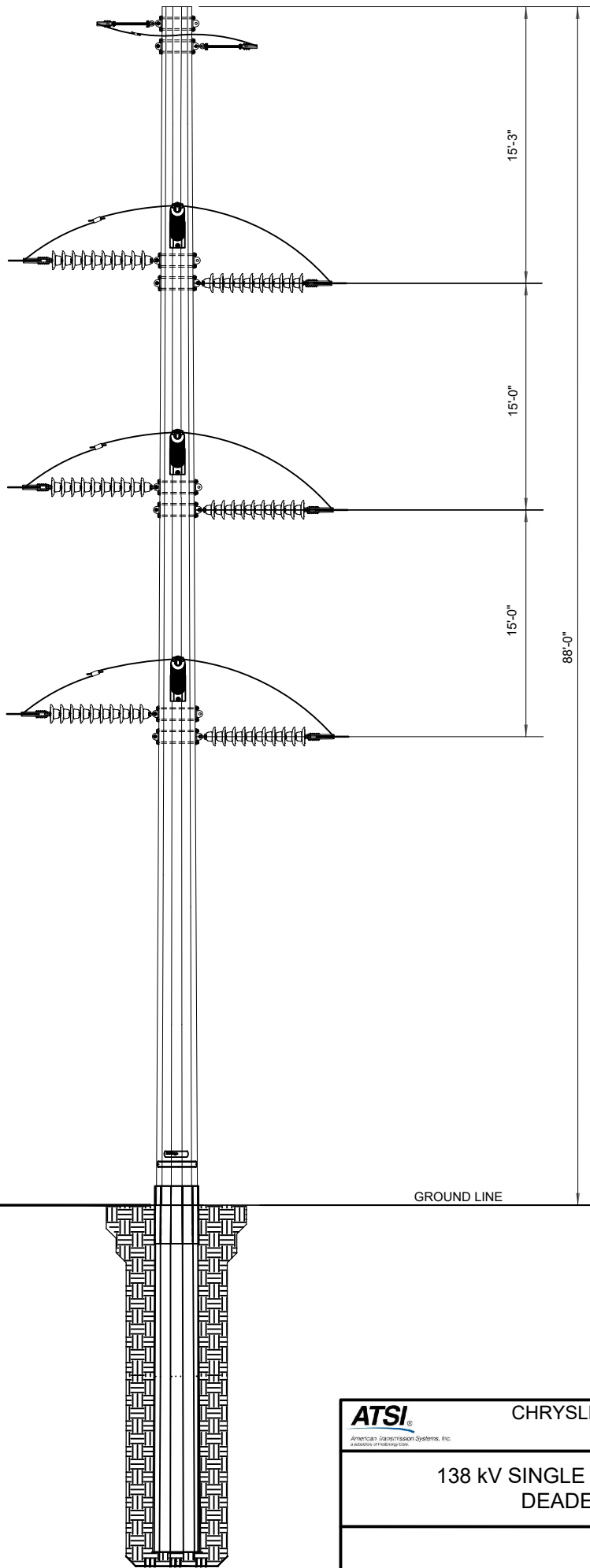
ATSI
American Transmission Systems, Inc.
a subsidiary of Westinghouse

CHRYSLER-DOWLING 138 KV TRANSMISSION LINE
SWITCH REPLACEMENT PROJECT

138 KV SINGLE CIRCUIT TUBULAR STEEL STRUCTURE
2000A UNITIZED SWITCH, SINGLE POLE

EXHIBIT 4

PAPER SIZE: 8.5X11



ATSI

American Transmission Systems, Inc.
a division of Westinghouse

CHRYSLER-DOWLING 138 KV TRANSMISSION LINE
SWITCH REPLACEMENT PROJECT

138 KV SINGLE CIRCUIT TUBULAR STEEL STRUCTURE
DEADEND ANGLE (35°), SINGLE POLE

EXHIBIT 5



In reply refer to:
2024-WOO-61940

April 7, 2025

Justin McKissick, MA, RPA
Project Archaeologist/Field Director
TRC Environmental Corporation
317 E Carson Street, Suite 113
Pittsburgh, PA 15219
Email: JMcKissick@trccompanies.com

RE: Section 106 Review: Chrysler-Dowling 138 kV Switch Replacement Project, Perrysburg Township, Wood County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on March 10, 2025, regarding the above-referenced project in Wood 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 replacement of switches A-13109 and A-13110 along the Chrysler-Dowling 138kV transmission line. 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. However, several resources fifty years of age or older were identified within the proposed indirect APE. The new infrastructure will not exceed the existing infrastructure heights, and no new visual impacts are anticipated. 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 me via email at sbiehl@ohiohistory.org. Thank you for your cooperation.

Sincerely,

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

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

RPR Serial No. 1107856



Office of Real Estate & Land Management

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

March 20, 2025

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

Re: 25-0309 - Chrysler-Dowling A-13110 & A-13109 Switch

Project: The proposed project involves the replacement of two switches onto nearby existing poles along the Chrysler-Dowling 138kV transmission line.

Location: The proposed project is located in Perrysburg Township, Wood County, Ohio.

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

Natural Heritage Database: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

Please note that Ohio has not been completely surveyed, and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

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

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

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer

(April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "[OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING](#)". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the 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 western banded killifish (*Fundulus diaphanatus menona*), a state endangered fish, and the greater redhorse (*Moxostoma valenciennesi*), a state threatened fish. 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 Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet meadows and other wetlands. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

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

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

If the subject project is in a floodplain regulated by the Federal Emergency Management Agency (FEMA), the [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals. The FEMA National Flood Hazard Layer (NHFL) Viewer [website](#) can be utilized to see if the project is in a FEMA regulated floodplain. If the project is not in a FEMA regulated floodplain, then no further action is required.

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

Expiration: ODNR Environmental Reviews are typically valid for 2 years from the issuance date. If the scope of work, project area, construction limits, and/or anticipated impacts to natural resources have changed significantly from the original project submittal, then a new Environmental Review request should be submitted.

EXHIBIT 7A

Stolarski, Adrianna

From: Eileen.Wyza@dnr.ohio.gov
Sent: Tuesday, April 1, 2025 8:27 AM
To: Slabe, Jenna
Cc: Falkinburg, Brad M (Ruszala, Amy M); Molnar, Maggie; Stolarski, Adrianna
Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Chrysler-Dowling A-13110 and A-13109 Switch 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 Chrysler-Dowling A-13110 and A-13109 Switch 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



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Please consider the environment before printing this email.

From:
Slabe,
Jenna

<JSlabe@trccompanies.com>

Sent: Monday, March 31, 2025 5:31 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 Chrysler-Dowling A-13110 and A-13109 Switch 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 Chrysler-Dowling A-13110 and A-13109 Switch Project located in Perrysburg Township, Wood County, Ohio. We have noted in the assessment that no ground disturbance, specifically to bedrock, will occur due to the Project.

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

Jenna Slabe

Ecologist



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

C 330.998.0481 | JSlabe@TRCcompanies.com

TRCcompanies.com

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United States Department of the Interior



FISH AND WILDLIFE SERVICE

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



March 3, 2025

Project Code: 2025-0058168

Dear Ms. Slabe:

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 ≥ 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). 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.

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

Sincerely,

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

Erin Knoll
Field Office Supervisor

Client Name: FirstEnergy	Site Location: Perrysburg Township, Wood County, Ohio	Project No. 429847.0022.0055
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Photo No. 1.	
Photo Date: 1/29/2025	
Description: Representative photo from the southeast extent of Project Study Area, facing north.	

Photo No. 2.	
Photo Date: 1/29/2025	
Description: Representative photo from the southwest extent of Project Study Area, facing south.	

Client Name: FirstEnergy	Site Location: Perrysburg Township, Wood County, Ohio	Project No. 429847.0022.0055
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Photo No. 3.	
Photo Date: 1/29/2025	
Description: Representative photo from the southeast extent of Project Study Area, facing west.	

Photo No. 4.	
Photo Date: 1/29/2025	
Description: Representative photo from the southwest extent of the Project Study Area, facing east.	

Client Name: FirstEnergy	Site Location: Perrysburg Township, Wood County, Ohio	Project No. 429847.0022.0055
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Photo No. 5.	
Photo Date: 1/29/2025	
Description: Representative photo from the northern extent of the Project Study Area, facing north.	

Photo No. 6.	
Photo Date: 1/29/2025	
Description: Representative photo from the northern extent of the Project Study Area, facing south.	

Client Name: FirstEnergy	Site Location: Perrysburg Township, Wood County, Ohio	Project No. 429847.0022.0055
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Photo No. 7.	
Photo Date: 1/29/2025	
Description: Representative photo of the Project Study Area, facing east.	

Photo No. 8.	
Photo Date: 1/29/2025	
Description: Representative photo of the Project Study Area, facing west.	

Client Name: FirstEnergy	Site Location: Perrysburg Township, Wood County, Ohio	Project No. 429847.0022.0055
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Photo No. 9.	
Photo Date: 1/29/2025	
Description: Representative photo of the Project Study Area, facing north.	

Photo No. 10.	
Photo Date: 1/29/2025	
Description: Representative photo of the Project Study Area, facing south.	

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
-- Saved By: MOPEL on 1/30/2025 14:58:16 PM; File Path: T:\1-PROJECTS\First_Energy\429847_0022_0055_ChryslerDowlingSwitch2-APRX\WDR.aprx; Layout Name: Fig03_Delineation



- PROJECT STUDY AREA
- UPLAND DATA POINT


BASE MAP: GOOGLE MAPS.
DATA SOURCES: TRC WETLAND DELINEATION COMPLETED JANUARY 29, 2025.



1:1,200
1" = 100'

0 100 200 FEET



PROJECT: FIRSTENERGY - CHRYSLER-DOWLING SWITCH A-13110 & A-13109 REPLACEMENT PROJECT WOOD COUNTY, OH			
TITLE: DELINEATED RESOURCES MAP			
DRAWN BY:	M. OPEL	PROJ. NO.:	429847.0022.0055
CHECKED BY:	M. MOLNAR	FIGURE 3	
APPROVED BY:	B. FALKINBURG		
DATE:	JANUARY 2025		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:		WDR.aprx	