AMERICAN TRANSMISSION SYSTEMS, INCORPORATED
A FIRSTENERGY COMPANY

CONSTRUCTION NOTICE

LALLENDORF-MONROE 345 kV TRANSMISSION LINE RECONDUCTOR PROJECT

OPSB CASE NO.: 19-1388-EL-BNR

July 22, 2019

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

CONSTRUCTION NOTICE
LALLENDORF-MONROE 345 kV TRANSMISSION LINE RECONDUCTOR PROJECT

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

4906-6-05 (B): CONSTRUCTION NOTICE REQUIREMENTS

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

Name of Project: Lallendorf-Monroe 345 kV Transmission Line Reconductor Project ("Project").

4906-11-02 (B) (2) (a): Brief Description of the Project

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, proposes to reconductor a segment of the Lallendorf-Monroe 345 kV Transmission Line by replacing the existing 2253.8 kcmil 84/19 AACSR conductor with 1926.9 kcmil ACSS/TW 42/19 high temperature conductor at the Maumee River crossing. The Project will start west of the Maumee River at Structure No.18 and continue for approximately 5,040-foot (0.95 mile) southeast to structure No.21.

The general location of the Project is shown in Exhibits 1 and 2. Exhibit 1 is a partial copy of the United States Geologic Survey, Lucas County, OH, Quad Map Lucas. Exhibit 2 provides a partial copy of ESRI aerial imagery. The general layout of the proposed Project is shown in Exhibit 3. The Project is located in the City of Toledo, Lucas County Ohio.

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 OAC Rule 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 transmission line, or replacing structures with a different type of structure, for a distance of:

(a) Two miles or less.

The proposed Project involves replacing the existing 2253.8 kcmil 84/19 AACSR conductor with 1926.9 kcmil ACSS/TW 42/19 high temperature conductor for a distance of 0.95 mile. This Project is located within existing right-of-way and no new right-of-way will be required for the Project.

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

This Project was identified by PJM in the Market-to-Market Study conducted on the Lallendorf-Monroe 345 kV Transmission Line. Based on the results of the Market-to-Market Study both PJM and MISO identified this Project as a Targeted Market Efficiency Project. A Targeted Market Efficiency Project is a Project that is identified as a market-to-market historic congestion reduction project that is generally small in scope with short lead times. TMEPs are reviewed and approved by both PJM and MISO.

The results for the TMEP analysis regarding this Project (identified by PJM as project b2972) were presented at the October '17 IPSAC meeting (see link below, slides 9, 10, 11 and 14).
https://www.pjm.com/-/media/committees-groups/stakeholder-meetings/ipsac/20171020-midwest/20171020-ipsac-presentation.ashx

This Project (project b2972) was approved by the PJM Board of Managers at the December 2017 meeting (see link below, slide 20).
https://www.pjm.com/-/media/committees-groups/committees/teac/20171214/20171214-teac-board-whitepaper-december-2017.ashx PJM has previously estimated that the less than million dollar cost of this Project will provide an estimated $11.3 million in congestion relief benefit in the first 4 years of operation.

ATSI is required to complete any baseline Project identified as a Targeted Market Efficient Project by PJM and MISO.

In addition to being required by PJM and MISO, the reconductoring of this line segment will help increase area reliability during peak load periods due to its increased rating. PJM has approved the Project and it is identified by PJM as project b2972. The Project is included in the FirstEnergy Corp 2019 Long Term Forecast Report ("LTFR").

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 LTFR. This map was submitted to the PUCO in Case No. 19-0806-EL-FOR under Rule 4901:5-5:04 (C) of the Ohio Administrative Code. This map is incorporated by reference only. This map shows ATSI's 345 kV and 138 kV transmission lines and transmission substations including the Lallendorf-Monroe 345 kV Transmission Line. The Project area is located approximately 3 $^{1}/_{2}$ inches (11" X 17" printed version) from the left edge of the map and 1 $^{1}/_{4}$ inches (11" X 17" printed version) from the bottom of the map. The general location of the Project is shown in Exhibits 1 and 2. The Project layout is shown in Exhibit 3.

This Project is identified in the FirstEnergy Corp 2019 LTFR Submitted to the Public Utility Commission of Ohio in Case Number 19-0806-EL-FOR as the Lallendorf-Monroe 345 kV Transmission Line.

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

The Project, as proposed, is within existing right-of-way and is limited to reconductoring the Maumee River spans. As such, no other alternatives with fewer impacts exist and therefore no other alternatives were considered.

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 the Project website and will continue to work with property owners concerning the proposed Project.

ATSI has also established a project website: https://www.firstenergycorp.com/about/transmission_projects/ohio.html .

Finally, during all phases of this Project, ATSI will maintain the transmission projects hotline at 1-800-589-2873 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 September 9, 2019 and completed by November 1, 2019.

4609-6-05 (B)(7): Area Map

The general location of the Project is shown in Exhibits 1 and 2. Exhibit 1 is a partial copy of the United States Geologic Survey, Lucas County, OH, Quad Map Lucas. Exhibit 2 provides a partial copy of ESRI aerial imagery. The general layout of the proposed Project is shown in Exhibit 3. The Project is located in the City of Toledo, Lucas County Ohio.

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

All Project activities will take place within existing right-of-way. The property information for this Project is listed below in Table 1:

Table 1. List of Affected Property Owners

Property Owner(s) & Address	Parcel Number(s)	Status
City of Toledo, Public Department 3900 Summit Street, Toledo OH 43611	1877906; 1800013	Previously Obtained
New Harrison Marina, Inc. 3834 Lighthouse Drive, Toledo, OH 43611	1106944	Previously Obtained
Toledo Lucas County Port Authority 0 Sinclair Street, Toledo, OH 43605	1879739; 1879673; 1879775	Previously Obtained
Buckeye Terminals LLC 359 Sinclair Street, Toledo, OH 43605	1879737	Previously Obtained
Buckeye Pipeline Company, P.A. Delaware St. Lawrence Drive, Toledo, OH 43605	1879784	Previously Obtained
Buckeye Terminals LLC A Delaware LLC 235 Sinclair Street, Toledo, OH 43605	1879714	Previously Obtained

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:	345 kV
Conductors:	1926.9 kcmil 42/19 type 13 ACSS/TW (New)
Static Wire:	7#120 Alumoweld (Remaining)
Insulators:	Porcelain

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

The closest occupied residence or institution is approximately 510 feet from the transmission line centerline. As this distance is greater than the 100 feet, Electric and Magnetic Field ("EMF") calculations have not been estimated.

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

The estimated capital cost for the proposed Project is approximately: $ 550,000.

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

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

The Project is located in the City of Toledo in Lucas County, Ohio. The main land use in the Project area is mostly industrial, with some commercial and residential use within one mile from the Project location. Based on the U.S. Bureau of Census estimates, the 2017 population of the City of Toledo was 276,491. The 2017 population of Lucas County was 430,887. As the proposed Project involves replacing the existing conductor within the existing right-of-way, no changes or impacts to the current land use are anticipated.

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

Agricultural land use does not exist within the Project limits.

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

A search of Ohio Historic Preservation Office ("OHPO") National Register of Historic Places ("NRHP") online database was conducted to identify the existence of any significant archeological or cultural resource sites within 0.5 miles of the Project Area. A map of the results of the search is shown in Exhibit 4. The OHPO database includes all Ohio listings on the NRHP, including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The results of the search indicate that there is one Listed NRHP properties and no OHPO eligible properties identified within 0.5 miles of the Project's potential disturbance area. The Listed NRHP site is located approximately 0.49 miles away from the proposed Project. Table 2 lists the NRHP site. The Listed NRHP site will not be impacted by the proposed Project.

Table 2. List of National Historic Registered Places

Resource Name	Address	City	County	Applicable Criteria 1 and 2
Bay View Yacht Club	3902 Summit Street, Toledo OH 43611	Toledo	Lucas	1. Event 2. Architecture/ Engineering

The OHPO database also includes listing of the Ohio Archaeological Inventory ("OAI"), the Ohio Historic Inventory ("OHI"), previous cultural resource surveys, and the Ohio Genealogical Society ("OGS") cemetery inventory. Five (5) OAI listed archeological resources have been previously inventoried within 0.5 miles of the Project area and are shown in Table 3. Fourteen (14) OHI listed structural resources are located within 0.5 miles of the Project area and are shown in Table 4. Four (4) previous archaeological resource surveys were conducted within 0.5 miles of the Project area. The previous cultural resources surveys are identified in Table 5.

Table 3. List of OAI Listed Archeological Resources

OAI Number	Affiliation	Description	County	Quad Name
LU0603	Historic	Non-Aboriginal	Lucas	Oregon
LU0608	Historic	Non-Aboriginal	Lucas	Oregon
LU0628	Prehistoric		Lucas	Oregon
LU0629	Prehistoric and Historic	Non-Aboriginal	Lucas	Oregon
LU0662	Prehistoric		Lucas	Oregon

Table 4. List of OHI Listed Structural Resources

OHI Number	Present Name	Historic Use	County	Municipality
LUC0328709	Marilyn Suder House	Single Dwelling	Lucas	City of Toledo
LUC0328809	Marilyn Ruffier House	Single Dwelling Carriage House/Garage	Lucas	City of Toledo
LUC0331309	Toledo L & L Realty Co House	Single Dwelling	Lucas	City of Toledo
LUC0331409	Summit Properties	Unknown Use	Lucas	City of Toledo
LUC0331509	Block Laundry Machine	Mill/Processing/ Manufacturing Facility	Lucas	City of Toledo
LUC0334709	CSX Railroad Bridge	Rail Related	Lucas	City of Toledo
LUC0188410	Harborside	Warehouse/Mill/Processing/ Manufacturing Facility	Lucas	City of Toledo
LUC0188510		Sewage Treatment Plant Water Works	Lucas	City of Toledo
LUC0233304		Single Dwelling	Lucas	City of Toledo
LUC0043709		Social/Civic Parking Lot	Lucas	City of Toledo
LUC0294709	S Nadeau House	Single Dwelling Carriage House/Garage	Lucas	City of Toledo
LUC0294809		Single Dwelling	Lucas	City of Toledo
LUC0294909	Jason Ruffler House	Single Dwelling	Lucas	City of Toledo
LUC0295009	Marilyn Ruffier House	Single Dwelling Carriage House/Garage	Lucas	City of Toledo

Table 5. Previous Cultural Resource Surveys

Year	Name	County	Municipality
1994	A Cultural Resources Reconnaissance Survey of the Maumee River Crossing in Lucas and Wood Counties, Ohio (PID 10718)	Lucas, Ohio	City of Toledo
1997	Phase I Archaeological Reconnaissance of the Feasible Alternative Access Improvements Tiffin Avenue Bridge Project, Toledo-Lucas County Port Authority, Toledo, Lucas County, Ohio	Lucas, Ohio	City of Toledo
1978	An Assessment of the Prehistoric and Historic Archaeological Resources of the Ten Mile Creek Sewer Area (in the City of) Toledo, Lucas County, Ohio	Lucas, Ohio	City of Toledo

1978	An Assessment of the Prehistoric and Historic Archaeological Resources of the Willowbrook Subdivision, Toledo, Lucas County, Ohio	Lucas, Ohio	City of Toledo

There are no OAI sites located within 0.5 miles of the Project's potential disturbance area. No OSG cemeteries are located within 0.5 miles of the Project area.

As the proposed Project involves replacing conductor on three (3) transmission line spans within previously disturbed area, no changes or impacts to archaeological and cultural resources are anticipated.

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

Table 6 shows the list of government agency requirements and the filing status at the time of filing.

Table 6. List of Government Agency Requirements to be Secured Prior to Construction

Agency	Permit Requirement	Status
USACE	Section 10 Permit, Section 12 Permit	Will be Filed

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

TRC Companies, Inc. ("TRC") on behalf of ATSI submitted a request to the Ohio Department of Natural Resources ("ODNR") Division of Wildlife to conduct an Environmental Review. As part of the Environmental Review, a search of the ODNR Division of Wildlife's Natural Heritage Database was conducted to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. A copy of the ODNR response received on February 5, 2019, is included as Exhibit 5.

The ODNR response indicates that the Project is within the range of the federal and state endangered species, Indiana Bat *(Myotis sodalis)*. There is no tree removal in the Project area and no impacts to these species are expected.

The ODNR response also indicates that the Project is within the range of the federal and state endangered mussels, Snuffbox *(Epioblasma triquetra)* and Rayed Bean *(Villosa fabalis)*. 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 ODNR response also indicates that the Project is within the range of the state endangered mussel, Eastern Pondmussel *(Ligumia nasuta)*. Due to the location, and that there is no in-water work proposed in a perennial stream, this Project is not likely to impactthese species.

The ODNR response also indicates that the Project is within the range of the state threatened mussels, Pondhorn *(Uniomerus tetralasmus)*, Black Sandshell *(Ligumia recta)*, Fawnsfoot *(Truncilla donaciformis)* and Threehorn Wartyback *(Obliquaria reflexa)*. 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 ODNR response also indicates that the Project is within the range of the state endangered fish, Western Banded Killifish *(Fundulus diaphanous menona)* and Lake Sturgeon *(Acipenser fulvescens)*. 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 ODNR response also indicates that the Project is within the range of the state threatened fish, Channel Darter *(Percina copelandi)*, American Eel *(Anguilla rostrata)* and Greater Redhorse *(Moxostoma valenciennesi)*. 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 ODNR response also indicates that the Project is within the range of the state threatened species, Blanding's Turtle *(Emydoidea blandingii)*, Spotted Turtle *(Clemmis guttata)*, Kirtland's Snake *(Clonophis kirtlandii)* and a state endangered species Blue-Spotted Salamander *(Ambystoma laterale)*. Due to the location, the type of habitat at the Project site and within the vicinity of the Project area, and the type of work proposed, this Project is not likely to impact these species.

The ODNR response also indicates that the Project is within the range of the state and federally endangered birds the Piping Plover *(Charadrius melodus)* and Kirtland's Warbler *(Setophaga kirtlandii)*. Due to the type of work proposed, this Project is not likely to impact these species.

The ODNR response also indicates that the Project is within the range of the following state endangered birds: American Bittern *(Botaurus lentiginosus),* Black Tern *(Chlidonias niger),* Common Tern *(Sterna hirundo),* King Rail *(Rallus elegans),* Cattle Egret *(Bubulcus ibis),* Lark Sparrow *(Chondestes grammacus) and* Upland Sandpiper *(Bartramia longicaudo).* Habitat for these birds vary from marsh areas to open fields. Nesting periods range from as early as April 1 to as late as August 15. The Project area is located in areas that are mostly developed for industrial uses. Further, the listed species nesting period ranges from April 1st to August 15th. The access roads to the Project area will be constructed after August 15th, therefore, even if these species are present in the Project area, no impacts to these species are anticipated.

TRC on behalf of ATSI also submitted a request to the US Fish and Wildlife Service ("USFWS") for an Ecological Review on January 3, 2019, to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. The USFWS's response on February 8, 2019 indicated that based on the Project type and limited impacts, they do not anticipate any impacts to federally protected species. A copy of the response is included as Exhibit 6.

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

TRC on behalf of ATSI submitted a request to the ODNR Division of Wildlife to conduct an Environmental Review. As part of the Environmental Review, a search of the ODNR Division of Wildlife's Natural Heritage Database was conducted to research the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. The ODNR response received on February 5, 2019 and included as Exhibit 5 does not indicate presence of any sensitive areas within one (1) mile of the Project area.

TRC on behalf of ATSI also submitted a request to the USFWS for an Ecological Review on January 3, 2019, to research the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected natural areas within one (1) mile of the

Project area. The USFWS's response on February 8, 2019 indicated that there are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project area. A copy of the response is included as Exhibit 6.

TRC biologists also conducted a waterways determination for the proposed Project area on December 19, 2018, for possible jurisdictional wetlands and streams. One jurisdictional wetland (Wetland 1) was identified within the study area. A map of the results of the survey is shown in Exhibit 7. Wetland 1 is a PEM wetland (approximately 0.09 acres within the study area) that is located on the southern side of the Maumee River and has direct connectivity to the river. This wetland extends beyond the study area boundaries to the east and west. It is dominated by *Phragmites australis*, an invasive plant. Wetland 1 follows a swale pattern and presumably obtains water from stormwater drains from the nearby industrial sites. This assumption is due to the location of culverts within the study area. The wetland is also within the FEMA 100 Year Floodplain and influenced by fluctuations in river levels. Best management practices will be utilized to protect the identified wetlands, including, if necessary, the use of construction matting and the implementation of erosion and sediment controls.

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 Toledo and Lucas County, Ohio.

Lucas County

Commissioner Pete Gerken,
President
Lucas County Commissioners
One Government Center, Suite 800
Toledo, OH 43604

Commissioner Carol Contrada,
Lucas County Commissioners
One Government Center, Suite 800
Toledo, OH 43604

Commissioner Tina Skeldon-
Wozniak
Lucas County Commissioners
One Government Center, Suite 800
Toledo, OH 43604

Ms. Megan Vahey Casiere
Lucas County Administrator
One Government Center, Suite 800
Toledo, OH 43604

Mr. Keith G. Earley P.E., P.S.
Lucas County Engineer
1049 S. McCord Road
Holland, OH 43528

Mr. Douglas J. Parrish, P.E., S.I.
Lucas County Planning Department
1049 S. McCord Road
Holland, OH 43528

City of Toledo

Mayor Wade Kapszukiewicz
City of Toledo
One Government Center
Toledo, OH 43604

Mr. Matt Cherry, President
City of Toledo Council
One Government Center
Toledo, OH 43604

Mr. Thomas C. Gibbons, Director
Toledo-Lucas County
Planning Commission
One Government Center, Suite 1620
Toledo, OH 43604

Ms. Melanie Campbell
Finance Director, City of Toledo
One Government Center
Toledo, OH 43604

Mr. Steven Shrake,
City of Toledo
Chief Building Official
One Government Center Suite 1600
Toledo, OH 43604

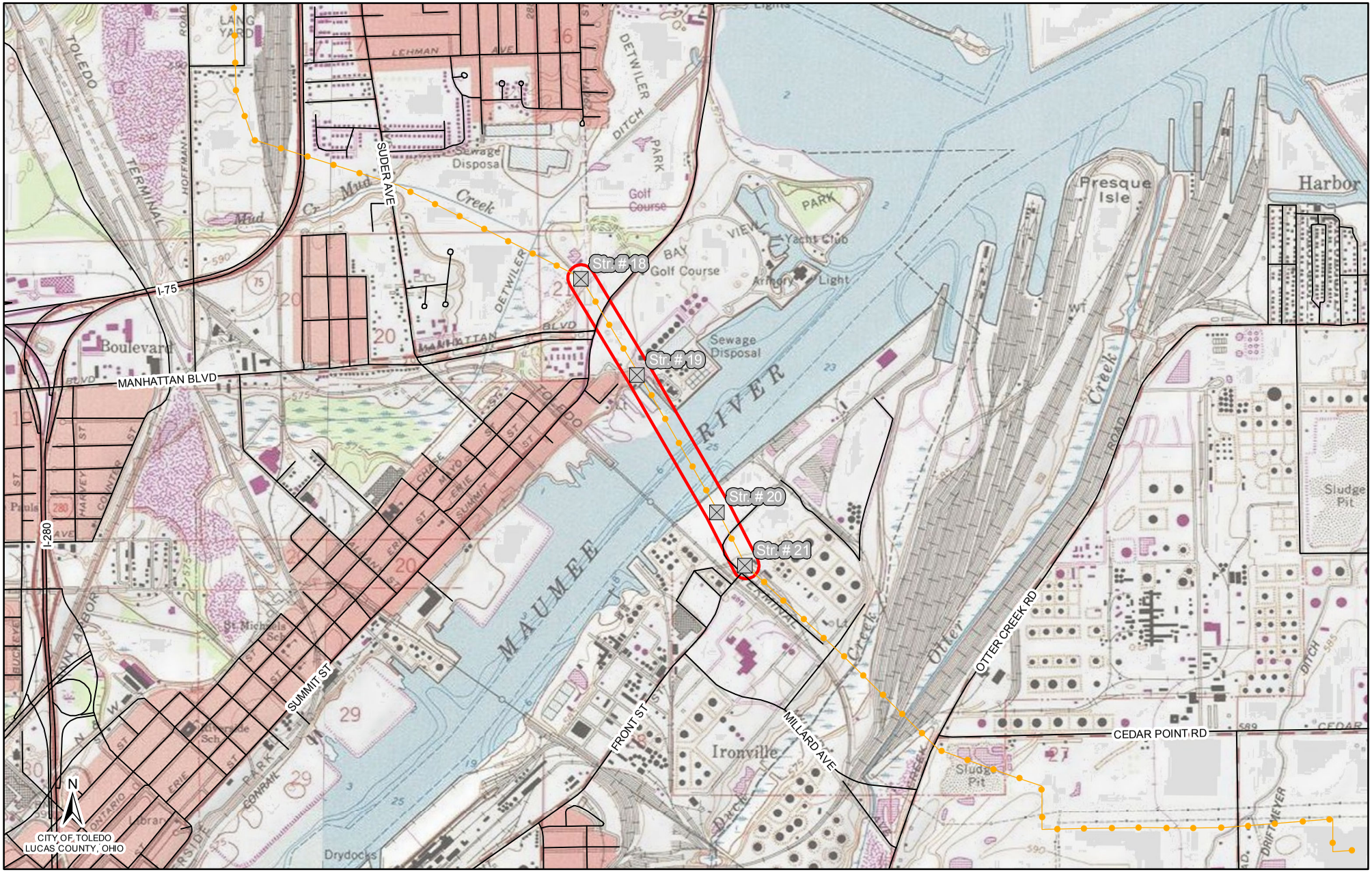
Libraries

Ms. Meg Delaney, Manager
Toledo-Lucas Co. Public Library
Main Branch
325 Michigan St.
Toledo, OH 43604

Ms. Andrea Hudak, Manager
Toledo-Lucas Co. Public Library
West Toledo Branch
1320 Sylvania Ave.
Toledo, OH 43612

Copies of the transmittal letters to these officials have been included with this Construction Notice application to the Ohio Power Sitting Board and are being provided to meet the requirement of OAC 4906-6-07 (B) as proof of compliance with the notice requirement to local officials in OAC 4906-6-07 (A)(1) and to libraries at OAC 4906-6-07 (A)(2).

Information is posted on 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 the website is being provided to meet the requirement of OAC 4906-6-07 (B) and to provide the Board with proof of compliance with the notice requirements in OAC 4906-6-07 (A)(3).



LEGEND:

- Project Area
- Lallendorf-Monroe 345kV
- Structure
- Road

0 1,000 2,000 4,000

Feet

Reference:
USGS; ODOT TIMS

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

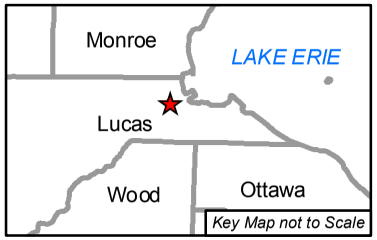


EXHIBIT 1

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

Lallendorf-Monroe 345 kV Transmission Line Reconductor Project

LEGEND:

- Project Area
- Lallendorf-Monroe 345kV
- Structure
- Road

0 1,000 2,000 4,000

Feet

Reference:
ESRI; ODOT TIMS

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

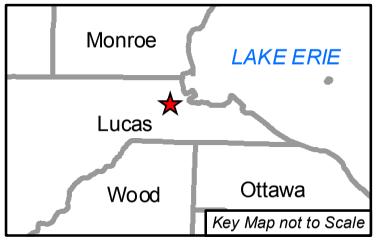
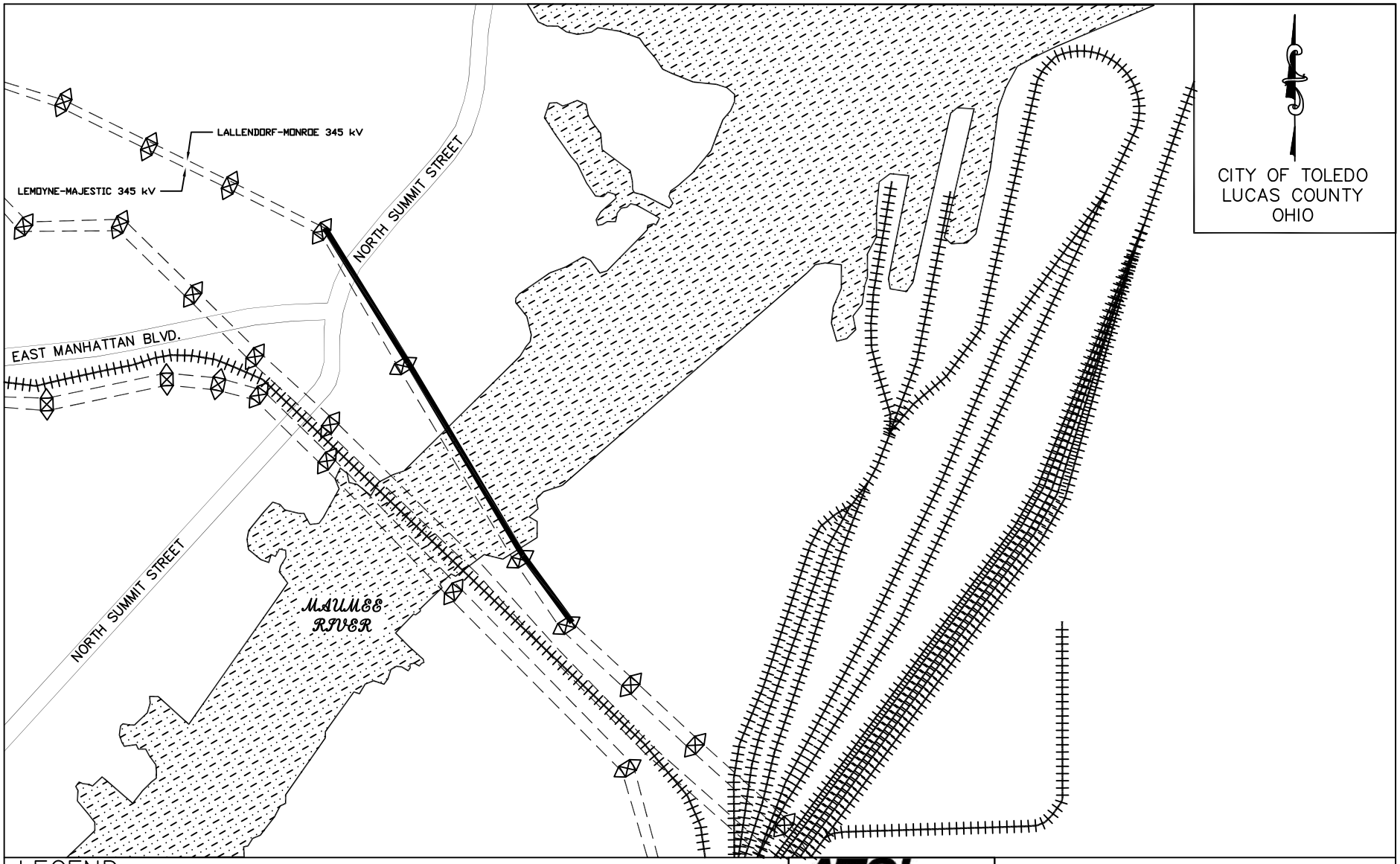


EXHIBIT 2

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

Lallendorf-Monroe 345 kV Transmission Line Reconductor Project



LEGEND

- EXISTING CONDUCTOR
- NEW CONDUCTOR
- STEEL LATTICE TOWER STRUCTURE TO REMAIN
- EXISTING ROADS
- RAILROAD
- EXISTING POND/LAKE/RIVER

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

LALLENDORF–MONROE 345 kV
TRANSMISSION LINE RECONDUCTOR
PROJECT

GENERAL LAYOUT

EXHIBIT 3

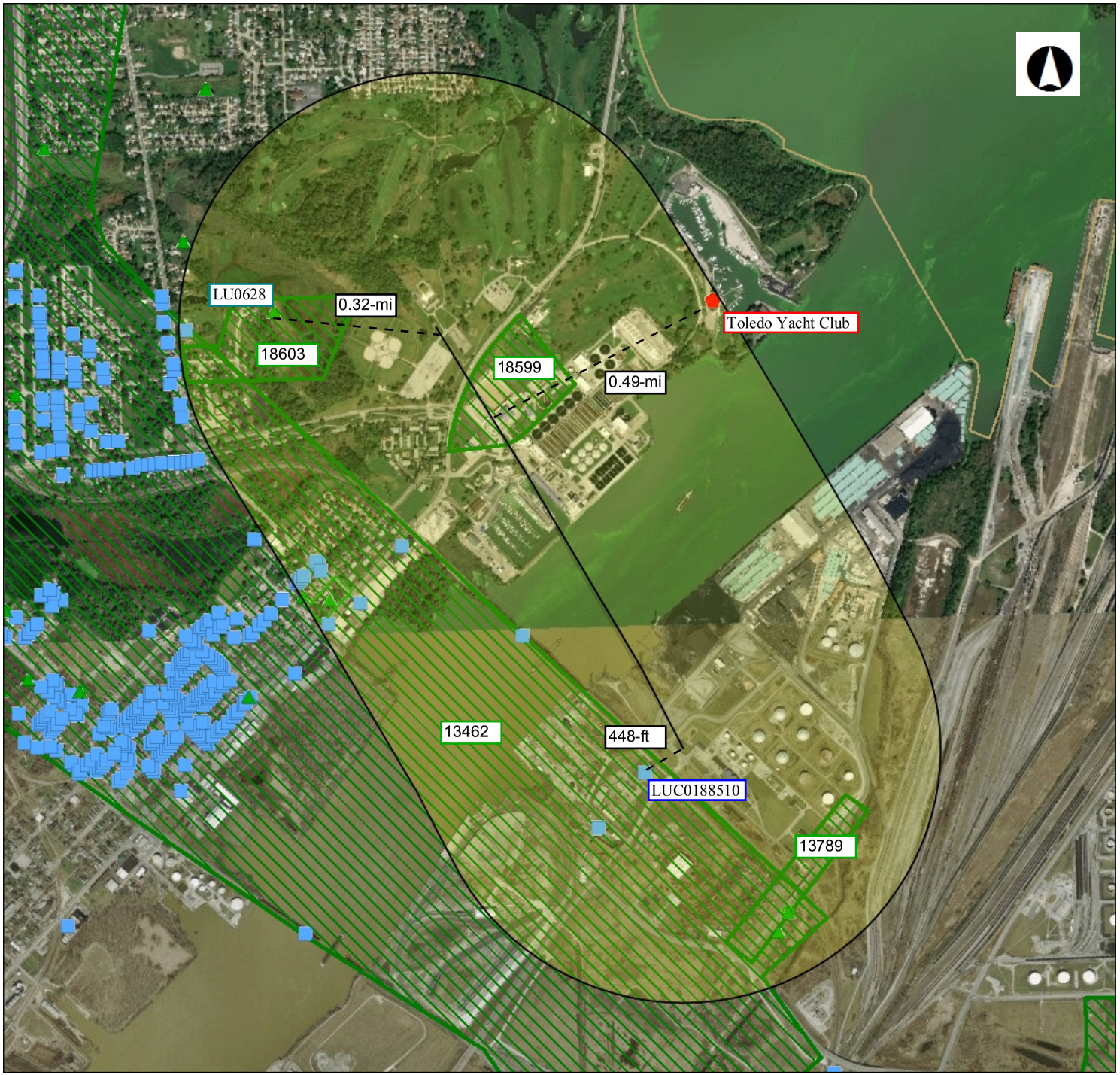


EXHIBIT 4

Ohio Historic Preservation Office

Legend

- NR Listings
  - Listed
  - National Historic Landmark
  - Delisted
- NR Determinations of Eligibi
- Archaeological Sites
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- OGS Cemeteries
  - Confident
  - Not Confident
- Dams
- UTM Zone Split
- NR Boundaries
- OAI Site Boundaries
- Phase1
- Phase2

0 0.30 0.61 Miles

1: 24,000

Copyright/Disclaimer

Datum: [Datum]

Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere

EXHIBIT 5

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR — MARY MERTZ, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

February 5, 2019

Jason Whittle
TRC
1382 West Ninth Street, Suite 400
Cleveland, Ohio 44113

Re: 19-012; Lallendorf-Monroe 345kV Restringing Project

Project: The proposed project includes providing upgrades to existing infrastructure.

Location: The proposed project is located in the City of Toledo, Lucas County, Ohio.

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

Natural Heritage Database: The Natural Heritage Database has the following records at or within a one-mile radius of the project area:

Blanding's turtle (*Emydoidea blandingii*), T, FSC
Bald eagle (*Haliaeetus leucocephalus*), FSC
Channel darter (*Percina copelandi*), T

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

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

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; A = species recently added

to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

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 project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, the eastern pondmussel *(Ligumia nasuta*), a state endangered mussel, the range of the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel, the pondhorn (*Uniomerus tetralasmus*), a state threatened mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, the fawnsfoot (*Truncilla donaciformis*), a state threatened mussel, and the threehorn wartyback (*Obliquaria reflexa*), 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 these species.

The project is within the range of the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, the lake sturgeon (*Acipenser fulvescens*), a state endangered fish, the channel darter (*Percina copelandi*), a state threatened fish, the American eel (*Anguilla rostrata*), a state threatened 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 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 at the project site and within the vicinity of 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 at the project site and within the vicinity of 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 Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. Due to the location, the type of habitat at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the blue-spotted salamander (*Ambystoma laterale)*, a state endangered species. Due to the location, the type of habitat at the project site and within the vicinity of 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 piping plover (*Charadrius melodus*), a state endangered, and federally endangered bird, and the Kirtland's warbler (*Setophaga kirtlandii*), a state endangered and federally endangered bird. These species do not nest in the state but only utilize stopover habitat as they migrate through the region. Due to the type of work proposed, this project is not likely to impact these species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the black tern (*Chlidonias niger*), a state endangered bird. The black tern prefers large, undisturbed inland marshes with fairly dense vegetation and pockets of open water. They nest in various kinds of marsh vegetation but cattail marshes are generally favored. Nests are built on top of muskrat houses or on top of floating vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat from April 1 to June 30 to reduce impacts to this species. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the common tern (*Sterna hirundo*), a state endangered bird. The preferred nesting sites of common terns are natural or man-made islands that are free of mammalian predators and human disturbance. They will also utilize mainland beaches and dredge disposal areas but only when islands are unavailable. The common tern nests in colonies. Their eggs are laid in a grass-lined depression in the sand. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to August 1. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat

during the species' nesting period of May 1 to August 1. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 15 to August 15. If no wetland habitat will be impacted, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to June 30. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 to July 31. If this type of habitat will not be impacted, 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 U.S. Fish & Wildlife Service.

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

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

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

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

John Kessler
Environmental Services Administrator

EXHIBIT 6

Bryksenkova, Nataliya

Subject: FW: Lallendorf-Monroe 345kV Rewiring Project, Lucas Co.

From: Whittle, Jason <JWhittle@trcsolutions.com>
Sent: Friday, February 08, 2019 1:34 PM
To: Ruggiero, Augustine (Henslee, Dianna L) <aruggiero@firstenergycorp.com>
Subject: [EXTERNAL] FW: Lallendorf-Monroe 345kV Rewiring Project, Lucas Co.

Jason Whittle
330-472-8210

From: susan_zimmermann@fws.gov <susan_zimmermann@fws.gov> **On Behalf Of** Ohio, FW3
Sent: Friday, February 8, 2019 1:29 PM
To: Whittle, Jason <JWhittle@trcsolutions.com>
Subject: Lallendorf-Monroe 345kV Rewiring Project, Lucas Co.

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

TAILS# 03E15000-2019-TA-0621

Dear Mr. Whittle,

We have received your recent correspondence requesting information about the subject proposal. There are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area.

FEDERALLY LISTED, PROPOSED, AND CANDIDATE SPECIES COMMENTS: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, 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, consultation with the U.S. Fish and Wildlife Service should be initiated to assess any potential impacts.

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

Sincerely,

Patrice Ashfield,
Ohio Field Office Supervisor

LEGEND

Study Area (approx. 21 ac.)

Wetlands (approx. 0.09 ac.)

Notes:
1) Study Area Boundaries provided by FirstEnergy on 10/3/2018 with instructions to survey a 150' corridor centered on the existing ROW.

WORKING COPY

N

1 " = 450 '
1:5,400
0 450 900 Feet

PROJECT:	**FIRSTENERGY CORPORATION** **341 WHITE POND DRIVE, BUILDING B3** **AKRON, OHIO 44320**
TITLE:	**LALLENDORF-MONROE** **345 KV TRANSMISSION LINE** **RECONDUCTOR PROJECT**
DRAWN BY: JBW	PROJ NO.: 286577.0005
CHECKED BY: N/A	**EXHIBIT**
APPROVED BY: N/A	**WETLAND DELINEATION**
DATE: JANUARY 2019	
TRC	EXHIBIT 7
FILE NO.:	LallandorfFig2.mxd

Plot Date: 1/2/2019, 10:37:10 AM by JWHITTLE -- LAYOUT: ANSI B(11"x17")

Path: C:\Users\jwhittle\Desktop\FE Substations\ETF\286577.0005_Lallandorf-Monroe\LallandorfFig

Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet (Foot US) 0

Map Rotation:

TRC - GIS