

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

**CONSTRUCTION NOTICE**

**NILES-NILES CENTRAL 138 KV  
TRANSMISSION LINE SWITCH REPLACEMENT  
PROJECT  
OPSB CASE NO.: 25-0034-EL-BNR**

**February 26, 2025**

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

**CONSTRUCTION NOTICE  
NILES-NILES CENTRAL 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. 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: Niles-Niles Central 138 kV Transmission Line  
Switch Replacement Project (“Project”)

Reference Number: 2012

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

American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, proposes to replace two existing switches on the existing Niles-Niles Central 138 kV Transmission Line. The existing switches, Nos. A-296 and A-9030, and the respective wood pole switch structures (Str. Nos. 7400 and 7350) will be replaced with new, single-circuit steel monopole switch structures on concrete foundations. Switch No. A-296 (Str. 7400) is shifting 44’ to the south along the centerline, and Switch No. A-9030 (Str. 7350) is shifting 15’ to the east along the centerline. The Project is located in the city of Niles, Trumbull 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, Trumbull County, Ohio Quad Map. Exhibit 2 is a partial copy of ESRI aerial imagery. The general layout is shown in Exhibits 3 and 3A.

**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 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 Niles-Niles Central 138 kV Transmission Line's manually operated switches, A-296 and A-9030, need replacement to remedy emerging condition concerns and preserve operational reliability. Replacement is recommended because the switches are obsolete, and the design no longer meets present standards. The switches were installed on single wood poles installed in 1954. The obsolete design and assembly of these switches is subject to dimensional changes caused by warping, shrinking and deflection. This impacts both the supporting single wood-pole structures and the operating rod linkage. These changes can compromise operations with the potential for unintended arcing, thereby increasing the risk exposure for switchmen. Consultation with Engineering and Regional Operations, the combination of unavailability of parts, operational history, and continued changes in structure integrity, all indicate that attempts to repair the switch would be temporary in

nature or unsuccessful. The proposed solution is to replace both the switches and the structures, using an improved unitized design<sup>1</sup> meeting present engineering standards, while adding a motor capable of remote operation for enhanced system flexibility and personal safety.

#### **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. 2024 Long-Term Forecast Report. This map was submitted to the PUCO in Case No. 24-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. The Project is not included in ATSI's LTFR filed in 2024 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 switch. 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 install only motor operators and supporting equipment while reutilizing existing structures. This alternative was not chosen because the existing structure strength is not able to support the equipment and does not meet design standards.

#### **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

---

<sup>1</sup> A "unitized" design is one in which all three phases of the operating mechanism are factory mounted to a single ridged rail and lifted to the structure as a unit. This is an improvement over the "phase-over-phase" design in which each phase is individually built onto a platform in the field from a box of parts. Factory assembly and testing removes field errors and mitigates deflection-caused binding because the switch on the frame moves as a single unit.

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 April 15, 2025, and to be completed by July 1, 2025.

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

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

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

Switch Structure A-9030 is located within property (Parcel No. 25-901162) owned by the City of Niles, and Switch Structure A-296 will be located within property (Parcel No. 25-561210) owned by Macali J. Palmer, Jr et al, within existing right-of-way. No additional 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:	477 kcmil 26/7 ACSR (Existing)
Static Wire:	3#7 Alumoweld (Existing for Switch A-296) 134.6 kcmil 12/7ACSR (Existing for Switch A-9030)
Insulators:	Porcelain
ROW Width:	100'-180'
Structure Types:	Exhibit 4: Steel Pole Switch Structure on Concrete Foundation (Qty. 2)

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

There is one (1) occupied residence or institution within 100 feet from the edge of right-of-way containing the single circuit Niles-Niles Central 138 kV Transmission Line. However, as this is not a new facility, 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 \$ 1,486,000. 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 Niles, Trumbull County, Ohio. The main land use around the Project area is zoned residential and heavy industrial. 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 December 2, 2024, TRC Companies, Inc. (“TRC”) submitted requests 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 for both switch locations. On December 31, 2024, and January 2, 2025, SHPO replied to the request and the responses are attached as Exhibits 5 and 5A, respectively. 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 for both switches there are no NRHP-listed above-ground resources and no OGS cemeteries. There are 78 above-ground historic resources that have not been formally evaluated for NRHP eligibility within 1.0 mile of the APE of Switch A-296, and 57 above-ground historic resources within 1.0 mile of Switch A-9030. Within 1.0 mile of the Project’s APE, there are 2 OAI sites. One of these sites is a pre-contact site, and the other site is a historic twentieth-century homestead. 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.

**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 October 4, 2024, stated that there are no records of state or federally listed plants and animals within one mile of the specified Project area. Copies of ODNR's Office of Real Estate's responses are included as Exhibits 6 and 6A.

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 June 20, 2024. 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 both switch locations, which TRC completed for ATSI and submitted to ODNR for concurrence on October 10, 2024, for A-296 and October 14, 2024, for A-9030. ODNR responded on October 15 for Switch A-296 and on October 22, 2024, for Switch A-9030, attached as Exhibits 7 and 7A, respectively, 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 species.

The ODNR-DOW also identified the Project as within the range of the northern brook lamprey (*Ichthyomyzon fossor*, State Endangered), mountain brook lamprey (*Ichthyomyzon greeleyi*, State Endangered). The Project is also in the range of the eastern massasauga (*Sistrurus catenatus*, State Endangered and Federally Threatened), spotted turtle (*Clemmys guttata*, State Threatened), and the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*, State Endangered and Federally Proposed Endangered). Due to the type, size, and location, the proposed Project is not likely to impact these species.



As part of the investigation, TRC also submitted requests to the U.S. Fish and Wildlife Service (“USFWS”) for an Ecological Review within one (1) mile of the Project areas on September 9, 2024. Responses were received from USFWS on September 18, 2024, and are included as Exhibit 8 and 8A. The responses state 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**

<b>Common Name</b>	<b>Scientific Name</b>	<b>Federal Listed Status</b>	<b>State Listed Status</b>	<b>Preferred Habitat</b>	<b>Suitable Habitat Present within Study Area</b>
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
Northern Brook Lamprey	<i>Ichthyomyzon fossor</i>	NA	Endangered	Perennial Streams	No
Mountain Brook Lamprey	<i>Ichthyomyzon greeleyi</i>	NA	Endangered	Perennial Streams	No
Eastern Massasauga	<i>Sistrurus catenatus</i>	Threatened	Endangered	Wetlands and Forests	No
Spotted Turtle	<i>Clemmys guttata</i>	NA	Threatened	Wetlands	No

Eastern Hellbender	<i>Cryptobranchus alleganiensis alleganiensis</i>	Species of Concern	Endangered	Perennial Streams	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 Exhibits 9 and 9A. The Project Study Area is approximately 3.36-acres between the two switch locations located in the city of Niles, Trumbull County, Ohio. No wetlands or streams were identified within the Project area.

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 structures and foundations will be placed along developed ROW associated with the Niles-Niles Central 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 Niles, Trumbull County, Ohio:

**Trumbull County**

Commissioner Tony Bernard  
Trumbull County Board of  
Commissioners  
160 High Street NW  
Warren, Ohio 44481  
[Tony.Bernard@co.trumbull.oh.us](mailto:Tony.Bernard@co.trumbull.oh.us)

Mr. David DeChristofaro, P.E., P.S.,  
Trumbull County Engineer  
650 North River Road N.W.  
Warren, Ohio 44483-2255  
[david.dechristofaro@co.trumbull.oh.us](mailto:david.dechristofaro@co.trumbull.oh.us)

Commissioner Rick Hernandez  
Trumbull County Board of  
Commissioners  
160 High Street NW  
Warren, Ohio 44481  
[Rick.Hernandez@co.trumbull.oh.us](mailto:Rick.Hernandez@co.trumbull.oh.us)

Mr. James Davies, Chairman  
Trumbull County Planning Commission  
185 E. Market Street NE, Suite A  
Warren, Ohio 44481  
[tcplanning@co.trumbull.oh.us](mailto:tcplanning@co.trumbull.oh.us)

Commissioner Denny Malloy  
Trumbull County Board of  
Commissioners  
160 High Street NW  
Warren, Ohio 44481  
[Denny.Malloy@co.trumbull.oh.us](mailto:Denny.Malloy@co.trumbull.oh.us)

**City of Niles**

Mr. Steven Mientkiewicz  
Mayor, City of Niles  
City Building  
34 West State Street  
Niles, Ohio 44446  
[smientkiewicz@thecityofniles.com](mailto:smientkiewicz@thecityofniles.com)

Mr. Robert Marino Jr.  
President of Council, City of Niles  
City Building  
34 West State Street  
Niles, Ohio 44446  
[rmarino@thecityofniles.com](mailto:rmarino@thecityofniles.com)

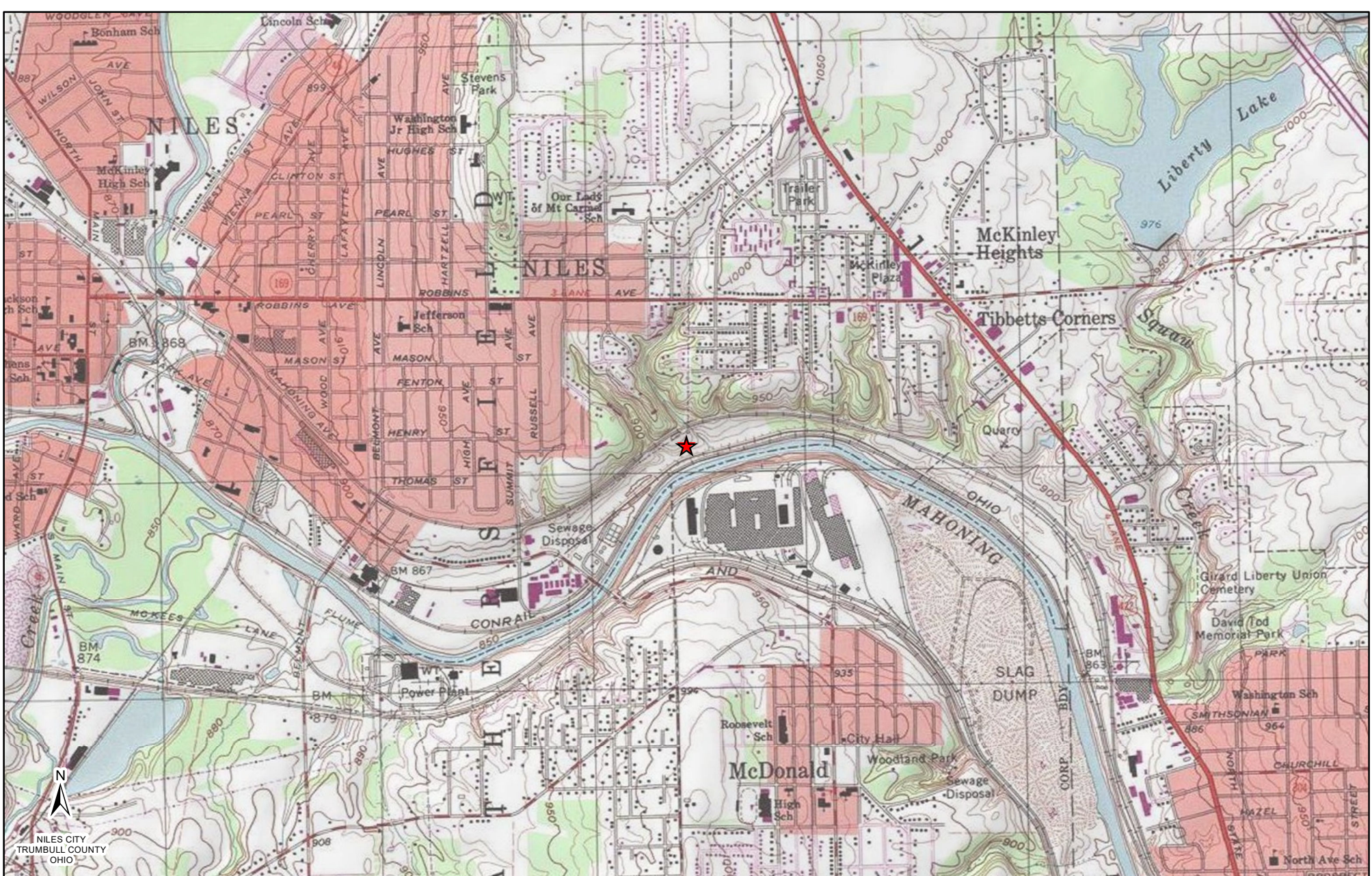
Mr. Stephen A. Telego Sr.  
Treasurer, City of Niles  
City Building  
34 West State Street  
Niles, Ohio 44446  
[stelego@thecityofniles.com](mailto:stelego@thecityofniles.com)

**Library**

Ms. Carrie Kibby, Director  
McKinley Memorial Library  
40 North Main Street  
Niles, OH 44446  
[ckibby@mcklib.org](mailto:ckibby@mcklib.org)

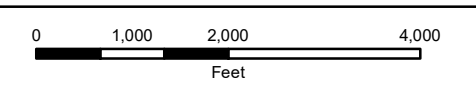
Per Adm.Code 4906-6-07(B), exemplar copies of the notice letters sent to local government officials and to the library have been included with this application as proof of compliance with requirements of Adm.Code 4906-6-07(A)(1) and 4906-6-07(A)(2).

Information is posted at [www.firstenergycorp.com/about/transmission\\_project/ohio.html](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).

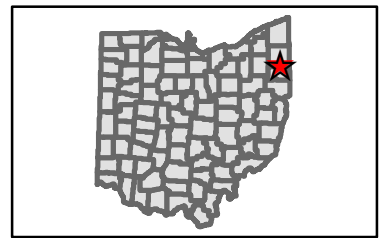


N  
 NILES CITY  
 TRUMBULL COUNTY  
 OHIO

**LEGEND:**  
 ★ Project Location



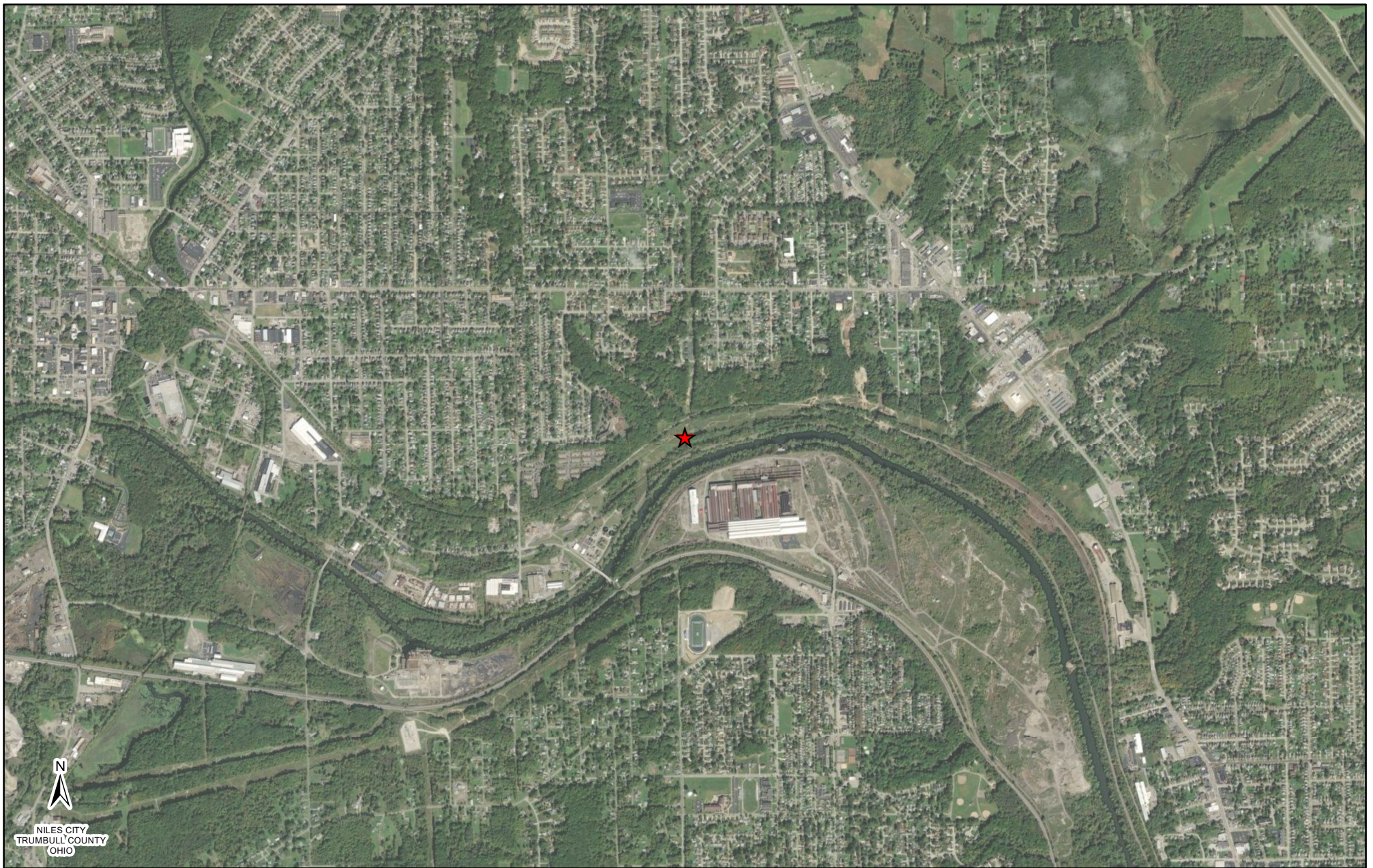
**Reference:**  
 USGS Topographical Overlay  
**Coordinate System:**  
 NAD 1983 StatePlane Ohio North FIPS 3401 Feet  
 Projection: Lambert Conformal Conic; Units: Foot US



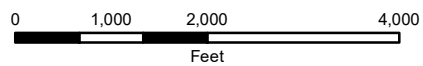
**EXHIBIT 1**

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

**Niles-Niles Central 138 kV Transmission Line  
 Switch Replacement Project**

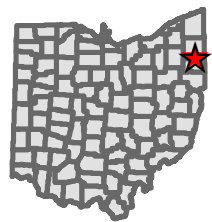


N  
NILES CITY  
TRUMBULL COUNTY  
OHIO



**Reference:**  
ESRI Imagery; ODOT

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



## EXHIBIT 2



### Niles-Niles Central 138 kV Transmission Line Switch Replacement Project

**LEGEND:**  
★ Project Location



ARLINGTON ARMS APARTMENTS

HAZEL AVE

HIRAM AVE

TO NILES CENTRAL MUNI SUB

CARNEGIE AVE

STATE HWY 169

YOULL ST

TO NILES SUB

#3909

#3910

TBR

#3911

#3912

TO MCDONALD STEEL SUB

E

TIMBERS CT

#7400 SWITCH A-296

STEPNEY ST

KEARNEY ST

CLARK ST

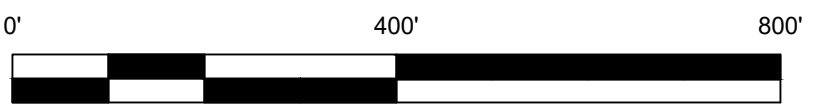
JAMES ST

CARDIGAN ST

STEPNEY ST

**LEGEND**

- TRANSMISSION CENTERLINE
- ROAD CENTERLINE
- OTHER TRANSMISSION CENTERLINE
- DISTRIBUTION CENTERLINE
- EXISTING TRANSMISSION TOWER (TO REMAIN)
- EXISTING WOOD POLE (TO BE REMOVED)
- PROPOSED STEEL SWITCH POLE



HORIZONTAL SCALE IN FEET



NILES-NILES CENTRAL 138kV SWITCH REPLACEMENT PROJECT

GENERAL LAYOUT (SWITCH A-296)

EXHIBIT 3

PAPER SIZE: 17X11

SCALE: NTS

TRUMBULL COUNTY  
STATE OF OHIO

#7350  
SWITCH A-9030

TBR

#3908

#3909

TO NILES CENTRAL MUNI SUB

TO MCDONALD STEEL SUB

NILES-SHENANGO 345KV LINE

#3907

TO NILES SUB

#3906

OLIVE ST

NORFOLK SOUTHERN RAILROAD

MAHONING RIVER

LEGEND

- TRANSMISSION CENTERLINE
- ROAD CENTERLINE
- + + + RAILROAD CENTERLINE
- E - OTHER TRANSMISSION CENTERLINE
- - - DISTRIBUTION CENTERLINE
- ... WATERS EDGE
- ..... RIVER
- TBR [Symbol] EXISTING TRANSMISSION TOWER (TO REMAIN)
- [Symbol] EXISTING WOOD POLE (TO BE REMOVED)
- [Symbol] PROPOSED STEEL SWITCH POLE

0' 400' 800'



HORIZONTAL SCALE IN FEET



NILES-NILES CENTRAL 138KV  
SWITCH REPLACEMENT PROJECT

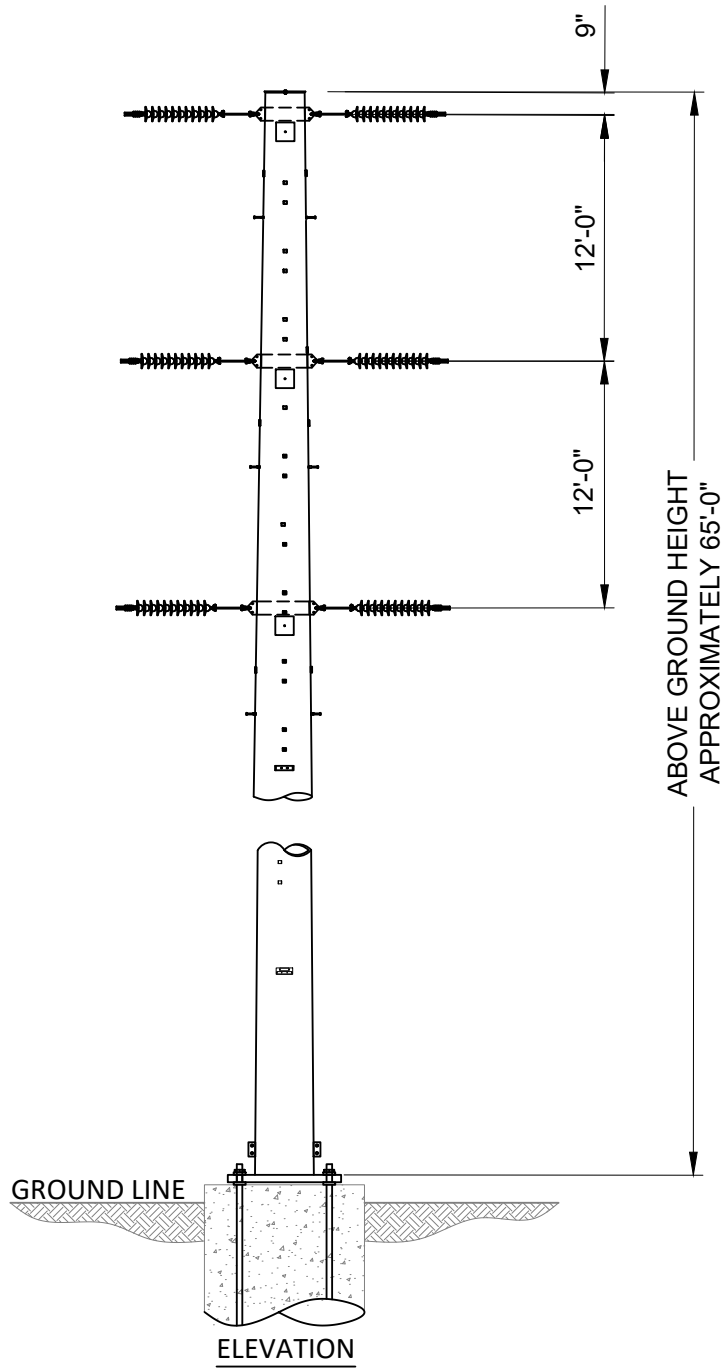
GENERAL LAYOUT (SWITCH A-9030)

EXHIBIT 3A

PAPER SIZE: 17X11

SCALE: NTS





**PRELIMINARY - NOT  
FOR CONSTRUCTION**

PAPER SIZE: 8.5X11

SCALE: NTS

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

NILES-NILES CENTRAL 138 kV TRANSMISSION LINE  
SWITCH REPLACEMENT PROJECT

138kV SINGLE CIRCUIT TUBULAR  
STEEL UNITIZED 2000A SWITCH STRUCTURE

**EXHIBIT 4**



# EXHIBIT 5

In reply refer to:  
2024-TRU-63182

December 31, 2024

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

RE: Section 106 Review: Niles-Niles Central 138kV A-9030 Switch Replacement Project, Niles,  
Trumbull County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on December 2, 2024, regarding the above-referenced project in Trumbull 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 the existing A-9030 switch along the Niles-Niles Central 138kV transmission line. All proposed work activities will be within the existing right-of-way and will utilize existing access roads. 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, removal and replacement of the existing 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. Joy Williams at [jwilliams@ohiohistory.org](mailto:jwilliams@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. 1106011



**OHIO HISTORIC PRESERVATION OFFICE:  
RESOURCE PROTECTION AND REVIEW**

**Section 106 Review - Project Summary Form**

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

**SECTION 1: GENERAL PROJECT 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. Please refer to the Instructions or contact an OHPO reviewer (mailto:Section106@ohiohistory.org) if you need help completing this Form. Unless otherwise requested, we will contact the person submitting this Form with questions or comments about this project.

Date: 12/02/2024
Name/Affiliation of person submitting form: Justin McKissick, MA, RPA
Mailing Address: 317 E. Carson Street, Suite 113, Pittsburgh, PA 15219
Phone/Fax/Email: 412.660.7937/jmckissick@trccompanies.com

**A. Project Info:**

1. This Form provides information about:

New Project Submittal:

**YES**

Additional information relating to previously submitted project:

**NO**

OHPO/RPR Serial Number from previous submission:

2. Project Name (if applicable): **Niles-Niles Central 138kV A-9030 Project**

3. Internal tracking or reference number used by Federal Agency, consultant, and/or applicant to identify this project (if applicable): **429847.0022.0048**

- B. Project Address or vicinity: **The proposed Study Area has approximate centroid 0.17 miles (mi) northeast of the intersection of Olive Road and Summit Avenue (41.172942, -80.738931). In addition, there are three (3) access points, located 0.02 and 0.13 mi east and 0.1 mi north of the same intersection (41.171601, -80.741149; 41.171559, -80.739106; and 41.172939, -80.741513).**
- C. City/Township: **City of Niles**
- D. County: **Trumbull County**
- E. Federal Agency and Agency Contact. *If you do not know the federal agency involved in your project, please contact the party asking you to apply for Section 106 Review, not OHPO, for this information. HUD Entitlement Communities acting under delegated environmental review authority should list their own contact information. **N/A***
- F. Type of Federal Assistance. *List all known federal sources of federal funding, approvals, and permits to avoid repeated reviews. **N/A***
- G. State Agency and Contact Person (if applicable): **Ohio Power Siting Board (OPSB)**
- H. Type of State Assistance: **N/A**
- I. Is this project being submitted at the direction of a state agency **solely** under Ohio Revised Code 149.53 or at the direction of a State Agency? *Answering yes to this question means that you are sure that no federal funding, permits or approvals will be used for any part of your project, and that you are seeking comments only under ORC 149.53.*  
**NO**
- J. Public Involvement- Describe how the public has been/will be informed about this project and its potential to affect historic properties. Please summarize how they will have an opportunity to provide comments about any effects to historic properties. (This step is required for all projects under 36 CFR § 800.2):
- K. Please list other consulting parties that you have contacted/will contact about this project, such as Indian Tribes, Certified Local Governments, local officials, property owners, or preservation groups. (See 36 CFR § 800.2 for more information about involving other consulting parties). Please summarize how they will have an opportunity to provide comments: **N/A**

## **SECTION 2: PROJECT DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)**

Provide a description of your project, its site, and geographical information. You will also describe your project's Area of Potential Effects (APE). Please refer to the Instructions or contact an OHPO reviewer if you need help with developing the APE or completing this form.

*For challenging projects, provide as much information as possible in all sections, and then check the box in Section 5.A. to ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties or if there may be challenging procedural issues related to your project. Please note that providing information to complete all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.*

A. Does this project involve any Ground-Disturbing activity: **Yes – minimal**

(If **Yes**, you must complete all of Section 2.A. If **No**, proceed directly to Section 2. B.)

1. General description of width, length and depth of proposed ground disturbing activity:

**The Limits of Disturbance (LOD) which corresponds to the Area of Potential Effects (APE) for direct effects, will be completely within the Study Area, which measures 2.45 acres (ac) in size (Figure 2). The 100-foot (ft) long (N-S) by 115-ft wide (E-W) Study Area surrounds the A-9030 switch location. Three (3) proposed access road locations are of various lengths and measure 30-ft wide. Timber matting will be utilized at the surface for any necessary wetland crossings. Tree clearing and grubbing is not anticipated within the Study Area.**

2. Narrative description of previous land use and past ground disturbances, if known: **Historically, the landscape was likely agricultural fields or wooded landscapes with development occurring predominately throughout the twentieth and into the twenty-first centuries. Buildings are mapped in the region as early as 1856 with a railroad line overlapping the northern portion of the Study Area.**

3. Narrative description of current land use and conditions:

**The modern aerial imagery shows a developed suburban and industrial landscape with the Study Area composed of consists of an existing utility right-of-way (ROW) and gravel access roads within industrial and forested habitats. General overview photographs are provided as Attachment 1.**

4. Does the landowner know of any archaeological resources found on the property?  
YES NO If yes, please describe: **Unknown**

B. Submit the exact project site location on a USGS 7.5-minute topographic quadrangle map for all projects. Map sections, photocopies of map sections, and online versions of USGS maps are acceptable as long as the location is clearly marked. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:

1. USGS Quad Map Name: **Girard, OH**

2. Township/City/Village Name: **City of Niles**

C. Provide a street-level map indicating the location of the project site; road names must be identified and legible. Your map must show the exact location of the boundaries for the project site. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map: **See Figure 2**

D. Provide a verbal description of the APE, including a discussion of how the APE will include areas with the potential for direct and indirect effects from the project. Explain the steps taken to identify the project's APE, and your justification for the specific boundaries chosen:

**The APE will include all areas in which construction activities associated with the proposed Project will take place. The surficial ground disturbances will primarily be associated with vehicle access within the disturbed ROW to complete the switch replacements. 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 miles (mi) of the undertaking. While there are buildings adjacent to the Study Area that are over 50**

**years of age, removal and replacement of the existing switches will not create new visual impacts. No tree clearing is anticipated. Existing access and former railroad grades will be utilized for access/egress.**

- E. Provide a detailed description of the project. This is a critical part of your submission. Your description should be prepared for a cold reader who may not be an expert in this type of project. The information provided must help support your analysis of effects to historic properties, not other types of project impacts. Do not simply include copies of environmental documents or other types of specialized project reports. If there are multiple project alternatives, you should include information about all alternatives that are still under active consideration:

**The proposed Project will involve the replacement of an existing A-9030 switch on the Niles-Niles Central 138kV transmission line. All work will be contained within existing ROW and utilized existing access roads.**

### **SECTION 3: IDENTIFICATION OF HISTORIC PROPERTIES**

Describe whether there are historic properties located within your project APE. To make that determination, use information generated from your own Background Research and Field Survey. Then choose one of the following options to report your findings. Please refer to the Instructions and/or contact an OHPO reviewer if you are unsure about how to identify historic properties for your project.

**TRC performed a desktop review based on data received from the Ohio History Connection (OHC) on November 29, 2024, 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 no NRHP-listed above-ground historic resources or Ohio Genealogical Society (OGS) Cemeteries recorded within one (1)-mi of the Study Area. There are 57 above-ground historic resources that have not yet been evaluated for NRHP eligibility recorded within one (1)-mi. The nearest of these resources is situated 0.37 mi to the north-northwest.**

**Three (3) formal archaeological surveys have been completed within one (1)-mi of the Study Area; however, none overlap with proposed Project. From these surveys, as well as local informants, two (2) previously recorded archaeological sites were identified within one (1)-mi of the Study Area. The sites include one (1) pre-contact open site with unknown temporal affiliation and one (1) twentieth century historic site; neither have been assessed for NRHP eligibility.**

**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 1856, the region had been settled with widely spaced buildings along established roadways outside the City of Niles, which had been established to the northwest and contained the densest population. A railroad line had been constructed along the northern portion of the Study Area. A single building attributed to *E. Baldwin* was recorded just south of the Study Area (Attachment 2, Image 1) (Browne 1856).**

**In 1874, the overall landscape remained similar. The City of Niles expanded in size as the suburbs reached just west of the Study Area. Several new railroad lines were constructed throughout the area, one (1) of which was situated just south of the Study Area, entirely located within a parcel attributed to the *H & M Baldwin Estate*. The City of Niles remained the most populated area in the vicinity of the Study Area (Attachment 2, Image 2) (Everts 1874).**

The 1899 historic map displays a similar landscape, with widely spaced buildings along the established roadways. The Study Area was located entirely within the limits of the City of Niles on a parcel attributed to *J.N. Baldwin*. The railroad lines continued to dominate the landscape through Niles City. Three (3) smaller parcels had been subdivided on the *Baldwin* parcel to the south and north (Attachment 2, Image 3) (American Atlas Company 1899).

The 1954/1959 historic USGS maps display a rural landscape with development centered around the City of Niles. Buildings were mapped in the vicinity of the western Study Area extent. The existing utility line corridor was not yet constructed, and a single building was documented at the western Study Area extent (Attachment 2, Image 4) (USGS 1954/1959).

From the mid-twentieth to late-twentieth and into the twenty-first century, the regional landscape surrounding the Study Area continued to grow as new residential developments and industrial areas were constructed in association with an increase in the regional population. The railroad lines were removed, and the current utility corridor was constructed. The waste-water facility was built to the southeast. The overall landscape within the Study Area has been disturbed.

*If you read the Instructions and you're still confused as to which reporting option best fits your project, or you are not sure if your project needs a survey, you may choose to skip this section, but provide as much supporting documentation as possible in all other Sections, then check the box in Section 5.A. to request preliminary comments from OHPO. After reviewing the information provided, OHPO will then offer comments as to which reporting option is best suited to document historic properties for your project. Please note that providing information to complete this Section will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.*

#### **Recording the Results of Background Research and Field Survey:**

- A. **Summary of discussions and/or consultation with OHPO** about this project that demonstrates how the Agency Official and OHPO have agreed that no Field Survey was necessary for this project (typically due to extreme ground disturbance or other special circumstances). Please **attach copies** of emails/correspondence that document this agreement. You must explain how the project's potential to affect both archaeological and historic resources were considered. **N/A**
- B. **A table that includes the minimum information** listed in the OHPO Section 106 Documentation Table (which is generally equivalent to the information found on an inventory form). This information must be printed and mailed with the Project Summary Form. To provide sufficient information to complete this Section, you must also include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated in the project APE. **N/A**
- C. **OHI (Ohio Historic Inventory) or OAI (Ohio Archaeological Inventory) forms-** New or updated inventory forms may be prepared using the OHI pdf form with data population capabilities, the Internet IForm, or typed on archival quality inventory forms. To provide sufficient information to complete this Section, you must include summary observations from your field survey and background research. You must also include eligibility determinations for each property that was evaluated in the project APE. **N/A**
- D. **A historic or archaeological survey report** prepared by a qualified consultant that meets professional standards. The survey report should meet the Secretary of the Interior's Standards and Guidelines for Identification and OHPO Archaeological Guidelines. You

may also include new inventory forms with your survey or update previous inventory forms. To complete this section, your survey report must include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated within the APE. **N/A**

E. **Project Findings.** Based on the conclusions you reached in completing Section 3, please choose one finding for your project. There are (mark one):

Historic Properties Present in the APE: **N/A**

No Historic Properties Present in the APE: **N/A**

#### **SECTION 4: SUPPORTING DOCUMENTATION**

This information must be provided for all projects.

A. Photographs must be keyed to a street-level map and should be included as attachments to this application. Please label all forms, tables, and CDs with the date of your submission and project name, as identified in Section 1. You must present enough documentation to clearly show existing conditions at your project site and convey details about the buildings, structures or sites that are described in your submission. Faxed or photocopied photographs are not acceptable. See Instructions for more info about photo submissions or 36 CFR § 800.11 for federal documentation standards.

1. Provide photos of the entire project site and take photos to/from historic properties from/towards your project site to support your determination of effect in Section 5. **See Attachment 1 - Photographs**

2. Provide current photos of all buildings/structures/sites described.

B. Project plan, specifications, site drawings and any other media presentation that conveys detailed information about your project and its potential to affect historic properties.

C. Copies or summaries of any comments provided by consulting parties or the public.

#### **SECTION 5: DETERMINATION OF EFFECT**

A. **Request Preliminary Comments.** For challenging projects, provide as much information as possible in previous sections and ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties, if the public has concerns about your project's potential to affect historic properties, or if there may be challenging procedural issues related to your project. Please be aware that providing information in all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.

1. We request preliminary comments from OHPO about this project:

**YES**

2. Please specify as clearly as possible the particular issues that you would like OHPO to examine for your project (for example- help with developing an APE, addressing the concerns of consulting parties, survey methodology, etc.):

**Please review the provided information and respond with your determination relative to the potential effects to cultural resources, if any.**



- B. **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 OHPO for concurrence, while considering public comments. Please select and mark one of the following determinations, then explain the basis for your decision on an attached sheet of paper:

**No historic properties will be affected** based on 36 CFR § 800.4(d) (1).  
Please explain how you made this determination:

**No Adverse Effect** [36 CFR § 800.5(b)] on historic properties. This finding cannot be used if there are no historic properties present in your project APE. Please explain why the Criteria of Adverse Effect, [36 CFR Part 800.5(a) (1)], were found not to be applicable for your project:

**Adverse Effect** [36 CFR § 800.5(d) (2)] on historic properties. Please explain why the criteria of adverse effect, [36 CFR Part 800.5(a) (1)], were found to be applicable to your project. You may also include an explanation of how these adverse effects might be avoided, reduced or mitigated:

*Please send completed form and supporting documentation to our office through the [section106@ohiohistory.org](mailto:section106@ohiohistory.org) e-mail address. Note that file size is limited to 30 MB. The Ohio SHPO has a federally mandated review time of 30 calendar day. To check your submission was received and logged in for our review, please visit <https://www.ohiohistory.org/preserve/state-historic-preservation-office/hpreviews/section-106-project-status>.*

## REFERENCES

### American Atlas Company

1899 "Map of Weathersfield Township" in *Atlas of Trumbull County, Ohio*. Published by American Atlas Company. Electronic document, <https://historicmapworks.com/Map/US/63801/Weathersfield++Niles+City/Trumbull+County+1899/Ohio/> accessed December 2, 2024.

### Browne, P.J.

1856 Map of Trumbull County, Ohio. Published by Gillette Matthews and Company, Philadelphia, Pennsylvania. Electronic document, <https://www.loc.gov/resource/g4083t.la000680/?r=0.733,0.23,0.335,0.209,0>, accessed December 2, 2024.

### Everts, L.H.

1874 "Map of Weathersfield Township" in *Combination Atlas Map of Trumbull County, Ohio*. Published by L.H. Everts, Chicago, Illinois. Electronic document, <https://historicmapworks.com/Map/US/20160/Weathersfield+Township/Trumbull+County+1874/Ohio/>, accessed December 2, 2024.

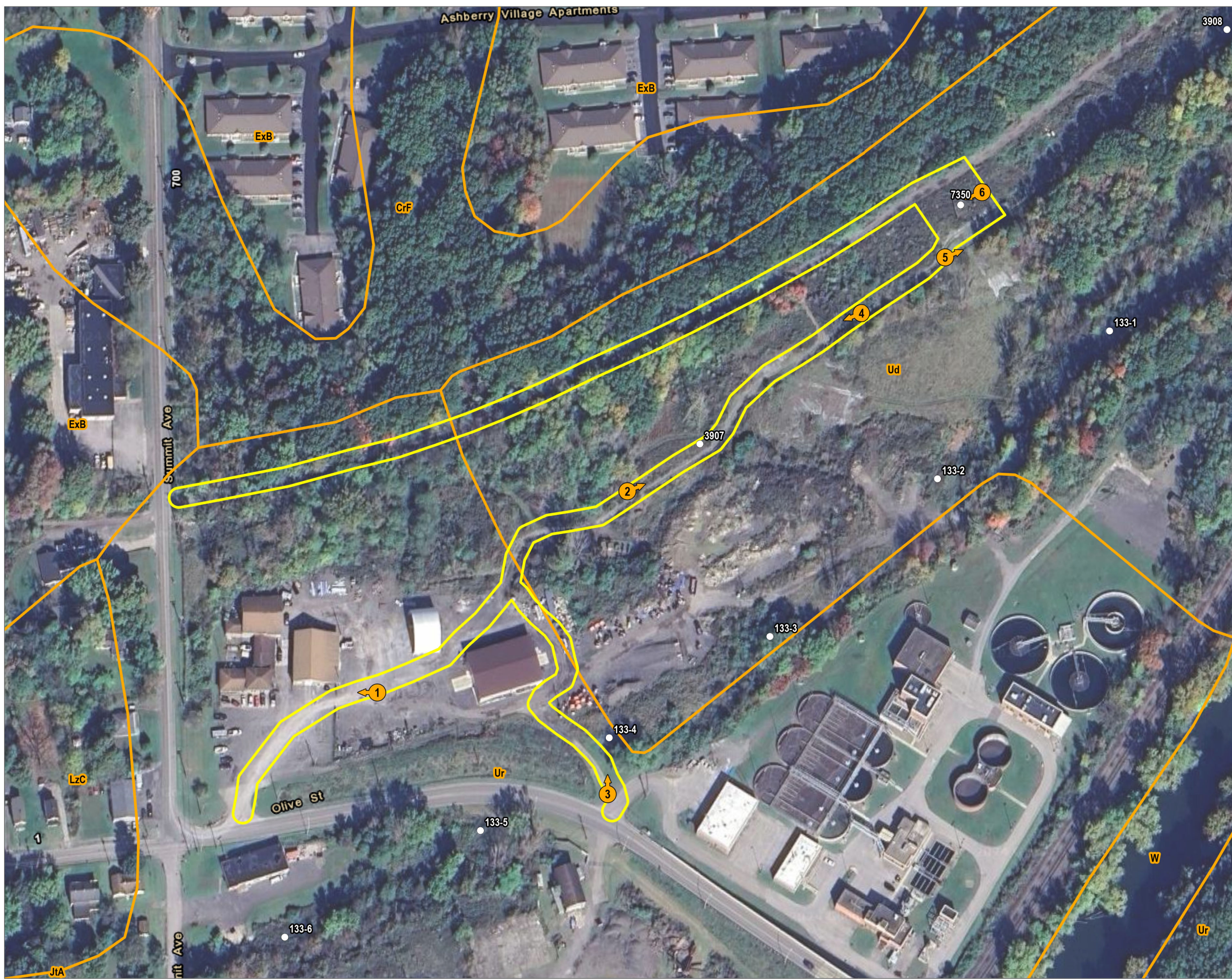
### United States Geographical Survey

1954 Girard, OH, 7.5-minute series topographic series. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#15/41.1729/-80.7394>, accessed December 2, 2024.

1959 Warren, OH, 7.5-minute series topographic series. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#15/41.1729/-80.7394>, accessed December 2, 2024.



Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 - Saved By: MOPEL on 12/2/2024, 11:30:56 AM; File Path: T:\PROJECTS\First\_Energy\429847\_0022\_0048\_NilesCentral\A9030\A-9030-APR\106Form.aprx; Layout Name: Fig02\_Aerial



- PROJECT STUDY AREA
- EXISTING STRUCTURE
- MAPPED SOIL UNITS
- ① PHOTO LOCATION



1:1,800  
 1" = 150'



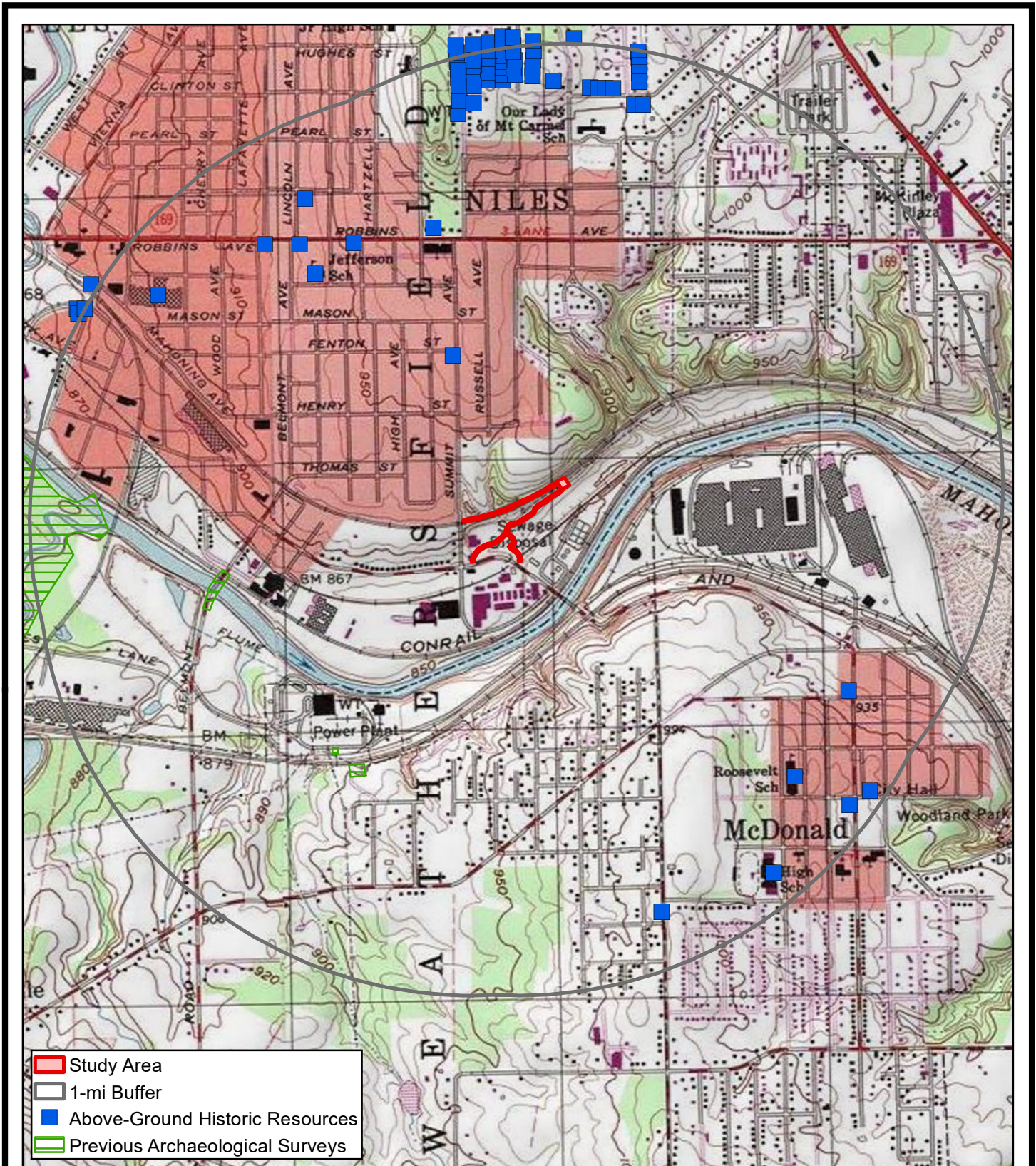
PROJECT: **FIRSTENERGY  
 NILES-NILES CENTRAL 138KV A-9030 PROJECT  
 TRUMBULL COUNTY, OH**

TITLE: **AERIAL BASEMAP WITH PHOTO LOCATIONS**

DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: J. MCKISSICK	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: DECEMBER 2024	

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

FILE: 106Form.aprx



BASEMAP FROM 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLE

N  
 1" = 1,667'  
 1:20,000  
  
 0 0.2  
 Miles  
  
 317 E. Carson Street  
 Suite 113  
 Pittsburgh, PA 15219  
 TRC - GIS

PROJECT:  
**Niles-Niles Central 138kV  
 A-9030 Project**  
 TITLE:  
**OHPO Database Search Results Map**

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0048
FILE:	Niles_A9030.mxd

**FIGURE 3**



**ATTACHMENT 1**  
**Photographs**

<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.</b> 429847.0022.0048
--	---	--

<b>Photo No. 1.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b>  Facing west, viewing the landscape at the western extent of the Study Area.	

<b>Photo No. 2.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b>  Facing east-northeast, viewing the landscape at the central portion of the Study Area.	

<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.</b> 429847.0022.0048
--	---	--

<b>Photo No. 3.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b>  Facing north, viewing the landscape within the southern portion of the Study Area.	

<b>Photo No. 4.</b>	
<b>Date:</b> 06/20/20204	
<b>Description:</b>  Facing west-southwest, viewing the landscape within the east-central portion of the Study Area.	

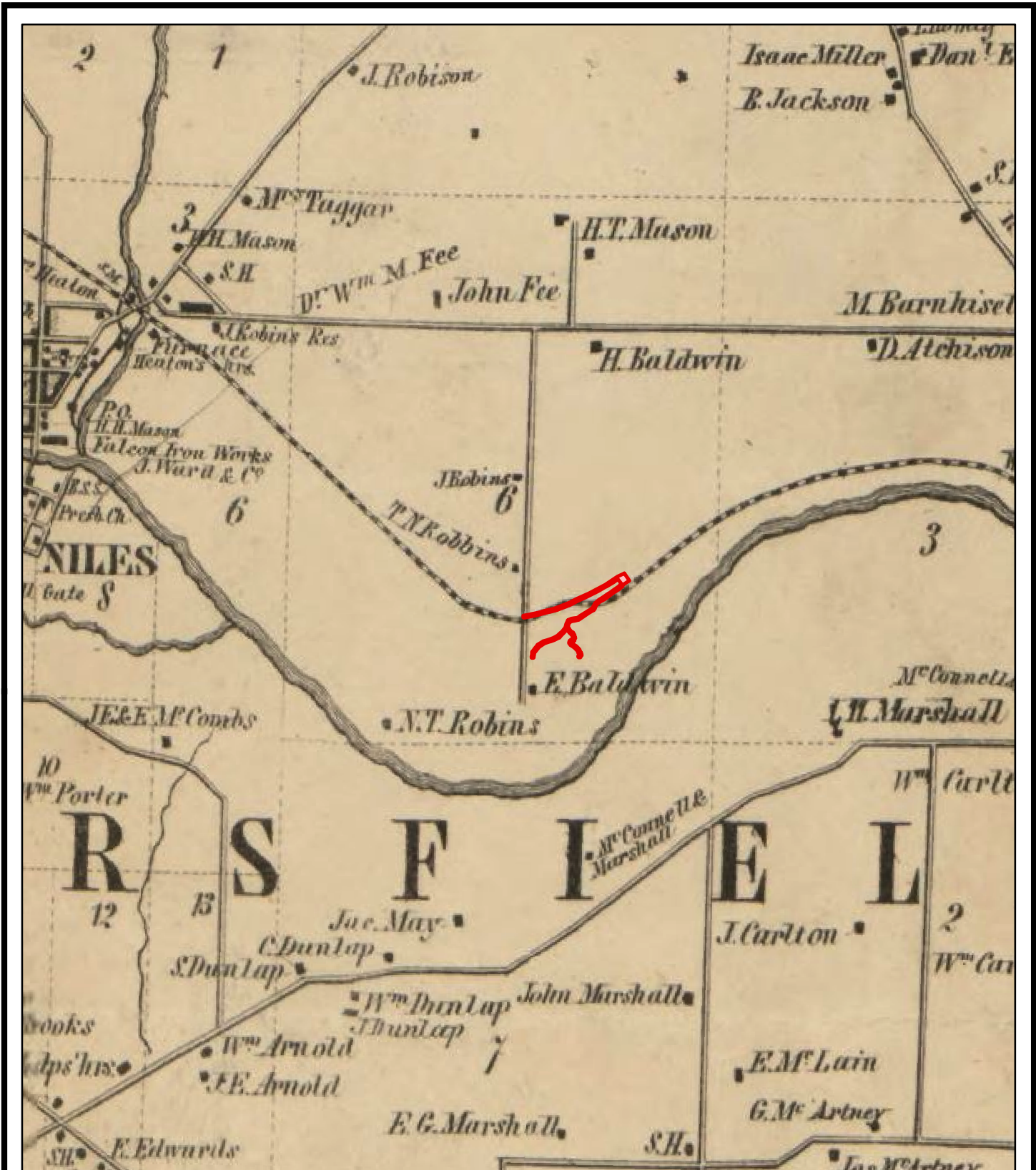
<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.</b> 429847.0022.0048
--	---	--

<b>Photo No. 5.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b>  Facing east-northeast viewing the landscape within the eastern portion of the Study Area.	

<b>Photo No. 6.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b>  Facing west-southwest, viewing the landscape at the eastern extent of the Study Area.	



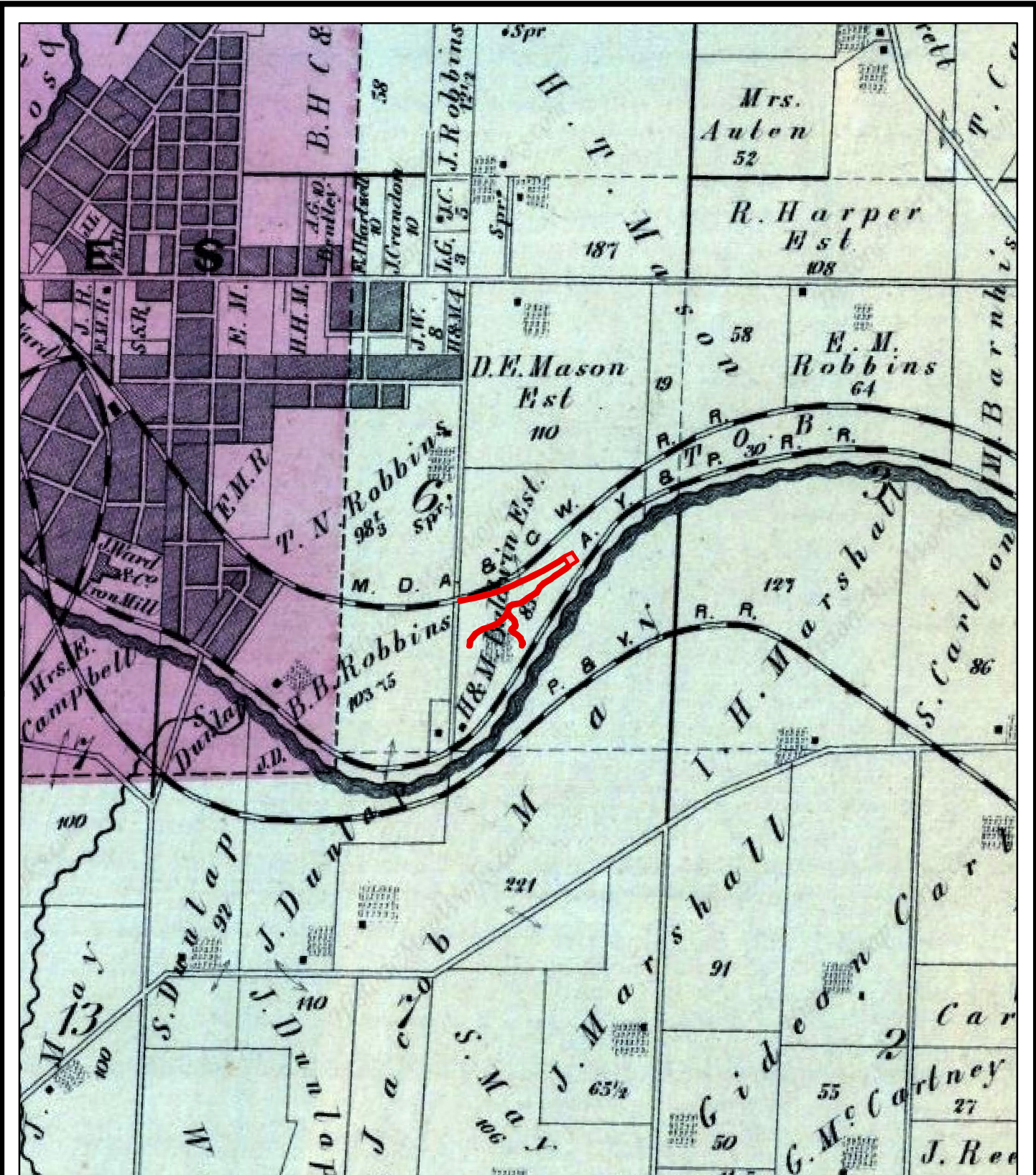
**ATTACHMENT 2**  
**Historic Map Images**



BASEMAP FROM MAP of TRUMBULL COUNTY, OHIO


\*Image overlay is approximate

	<p>PROJECT:</p> <p align="center"><b>Niles-Niles Central 138kV A-9030 Project</b></p>	<p>DRAWN BY: JUSTIN MCKISSICK</p>
	<p>TITLE:</p> <p align="center"><b>Study Area circa 1856 (Browne)</b></p>	<p>CHECKED BY: CURTIS BIONDICH</p> <p>APPROVED BY: CURTIS BIONDICH</p> <p>DATE: DECEMBER 2024</p> <p>PROJ. NO.: 429847.0022.0048</p> <p>FILE: Niles_A9030.mxd</p>
<p>317 E. Carson Street Suite 113 Pittsburgh, PA 15219</p> <p>TRC - GIS</p>		<p><b>Attachment 2 - Image 1</b></p>



BASEMAP FROM COMBINATION ATLAS MAP of TRUMBULL 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:

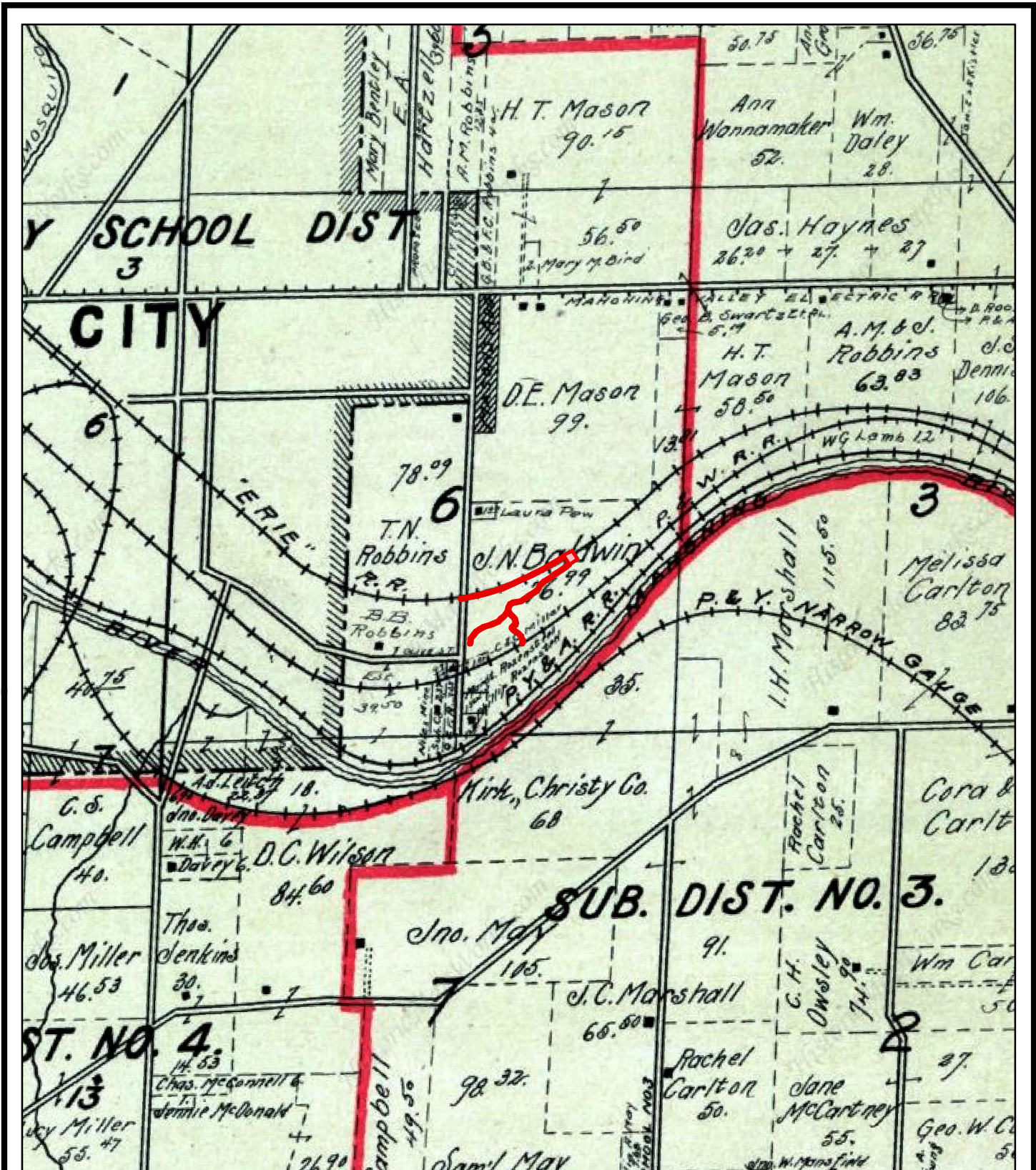
**Niles-Niles Central 138kV  
A-9030 Project**

TITLE:

**Study Area circa 1874 (Everts)**


DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0048
FILE:	Niles_A9030.mxd

**Attachment 2 - Image 2**



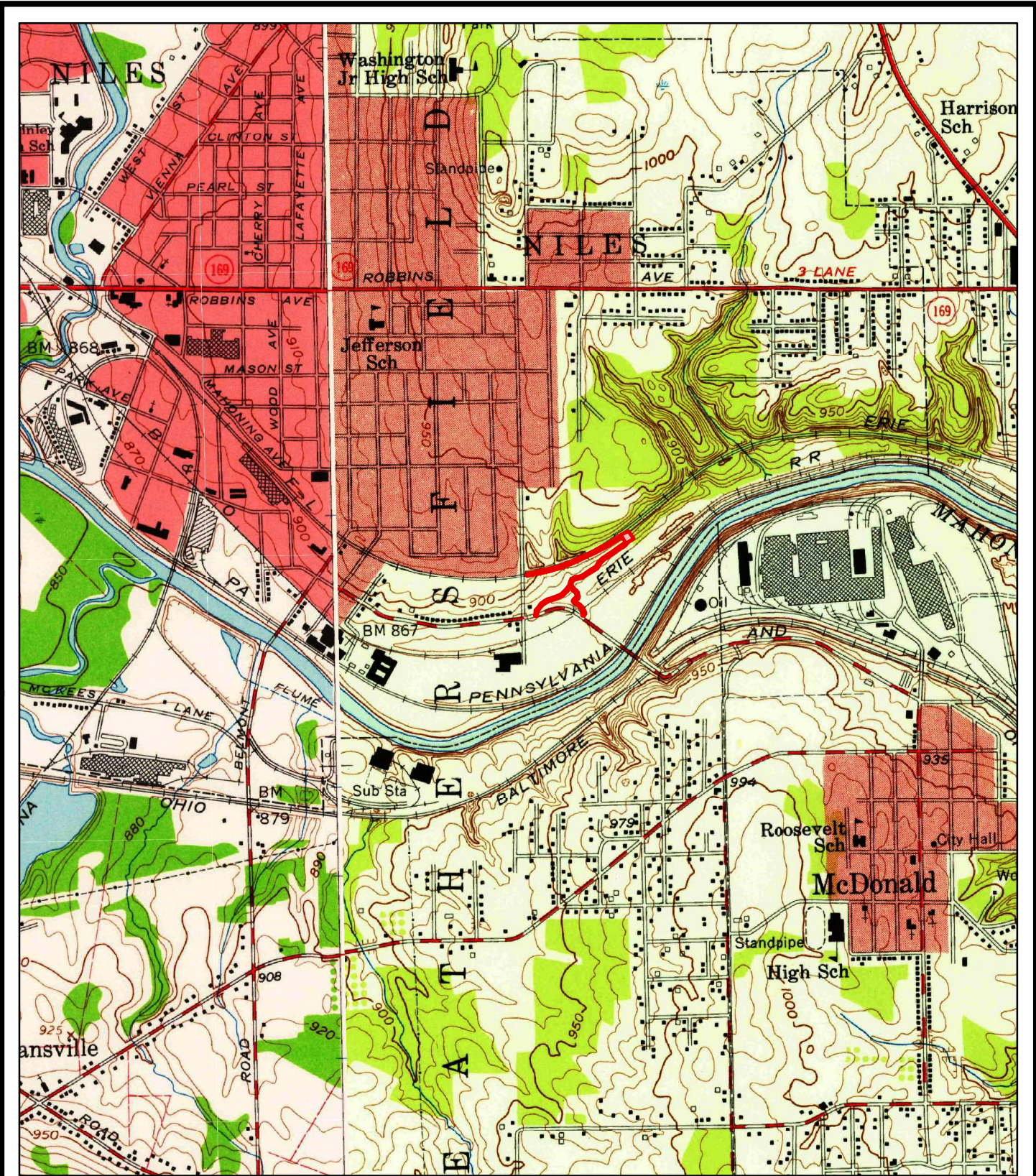
BASEMAP FROM ATLAS of TRUMBULL COUNTY, OHIO

\*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:	<b>Niles-Niles Central 138kV A-9030 Project</b>
TITLE:	<b>Study Area circa 1899 (American Atlas Company)</b>

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0048
FILE:	Niles_A9030.mxd
<b>Attachment 2 - Image 3</b>	



BASEMAP FROM 7.5 MINUTE SERIES TOPOGRAPHIC QUADRANGLES

\*Image overlay is approximate

N 1" = 1,667'  
 1:20,000  
 0 0.2  
 Miles  
  
 317 E. Carson Street  
 Suite 113  
 Pittsburgh, PA 15219  
 TRC - GIS

PROJECT:	<b>Niles-Niles Central 138kV A-9030 Project</b>
TITLE:	<b>Study Area circa 1954/1959 (USGS)</b>

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0048
FILE:	Niles_A9030.mxd
<b>Attachment 2 - Image 4</b>	



In reply refer to:  
2024-TRU-63234

January 2, 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](mailto:JMcKissick@trccompanies.com)

RE: Section 106 Review: Niles-Niles Central 138kV A-296 Switch Replacement Project, Niles,  
Trumbull County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on December 6, 2024, regarding the above-referenced project in Trumbull 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 the existing A-296 switch along the Niles-Niles Central 138kV transmission line. All proposed work activities will be within the existing right-of-way and will utilize an existing asphalt parking lot. 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, removal and replacement of the existing 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. Joy Williams at [jwilliams@ohiohistory.org](mailto:jwilliams@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. 1106088



**OHIO HISTORIC PRESERVATION OFFICE:  
RESOURCE PROTECTION AND REVIEW**

**Section 106 Review - Project Summary Form**

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

**SECTION 1: GENERAL PROJECT 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. Please refer to the Instructions or contact an OHPO reviewer (mailto:Section106@ohiohistory.org) if you need help completing this Form. Unless otherwise requested, we will contact the person submitting this Form with questions or comments about this project.

Date: 12/02/2024
Name/Affiliation of person submitting form: Justin McKissick, MA, RPA
Mailing Address: 317 E. Carson Street, Suite 113, Pittsburgh, PA 15219
Phone/Fax/Email: 412.660.7937/jmckissick@trccompanies.com

**A. Project Info:**

1. This Form provides information about:

New Project Submittal:

**YES**

Additional information relating to previously submitted project:

**NO**

OHPO/RPR Serial Number from previous submission:

2. Project Name (if applicable): **Niles-Niles Central 138kV A-296 Project**

3. Internal tracking or reference number used by Federal Agency, consultant, and/or applicant to identify this project (if applicable): **429847.0022.0047**

- B. Project Address or vicinity: **The proposed Study Area has approximate centroid 140 feet (ft) east of the intersection of Timber Court and James Street (41.179666, -80.731833).**
- C.
- D. City/Township: **City of Niles**
- E. County: **Trumbull County**
- F. Federal Agency and Agency Contact. *If you do not know the federal agency involved in your project, please contact the party asking you to apply for Section 106 Review, not OHPO, for this information. 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 federal sources of federal funding, approvals, and permits to avoid repeated reviews.* **N/A**
- H. State Agency and Contact Person (if applicable): **Ohio Power Siting Board (OPSB)**
- I. Type of State Assistance: **N/A**
- J. Is this project being submitted at the direction of a state agency **solely** under Ohio Revised Code 149.53 or at the direction of a State Agency? *Answering yes to this question means that you are sure that no federal funding, permits or approvals will be used for any part of your project, and that you are seeking comments only under ORC 149.53.*  
**NO**
- K. Public Involvement- Describe how the public has been/will be informed about this project and its potential to affect historic properties. Please summarize how they will have an opportunity to provide comments about any effects to historic properties. (This step is required for all projects under 36 CFR § 800.2):
- L. Please list other consulting parties that you have contacted/will contact about this project, such as Indian Tribes, Certified Local Governments, local officials, property owners, or preservation groups. (See 36 CFR § 800.2 for more information about involving other consulting parties). Please summarize how they will have an opportunity to provide comments: **N/A**

## **SECTION 2: PROJECT DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)**

Provide a description of your project, its site, and geographical information. You will also describe your project's Area of Potential Effects (APE). Please refer to the Instructions or contact an OHPO reviewer if you need help with developing the APE or completing this form.

*For challenging projects, provide as much information as possible in all sections, and then check the box in Section 5.A. to ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties or if there may be challenging procedural issues related to your project. Please note that providing information to complete all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.*

- A. Does this project involve any Ground-Disturbing activity: **Yes – minimal**



(If **Yes**, you must complete all of Section 2.A. If **No**, proceed directly to Section 2. B.)

1. General description of width, length and depth of proposed ground disturbing activity:

**The Limits of Disturbance (LOD) which corresponds to the Area of Potential Effects (APE) for direct effects, will be completely within the Study Area, which measures 0.91 acres (ac) in size (Figure 2). The 430-ft long (N-S) by 90-ft wide (E-W) Study Area surrounds the A-296 switch location. Timber matting will be utilized at the surface for any necessary wetland crossings. Tree clearing and grubbing is not anticipated within the Study Area.**

2. Narrative description of previous land use and past ground disturbances, if known:  
**Historically, the landscape was likely agricultural fields or wooded landscapes with development occurring predominately throughout the twentieth and into the twenty-first centuries. Buildings are mapped in the region as early as 1856.**

3. Narrative description of current land use and conditions:  
**The modern aerial imagery shows a developed suburban landscape with the Study Area composed of an existing utility right-of-way (ROW) over asphalt parking lot and manicured lawns. General overview photographs are provided as Attachment 1.**

4. Does the landowner know of any archaeological resources found on the property?  
YES NO If yes, please describe: **Unknown**

- B. Submit the exact project site location on a USGS 7.5-minute topographic quadrangle map for all projects. Map sections, photocopies of map sections, and online versions of USGS maps are acceptable as long as the location is clearly marked. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map:

1. USGS Quad Map Name: **Girard, OH**
2. Township/City/Village Name: **City of Niles**

- C. Provide a street-level map indicating the location of the project site; road names must be identified and legible. Your map must show the exact location of the boundaries for the project site. Show the project's Area of Potential Effects (APE). It should be clearly distinguished from other features shown on the map: **See Figure 2**

- D. Provide a verbal description of the APE, including a discussion of how the APE will include areas with the potential for direct and indirect effects from the project. Explain the steps taken to identify the project's APE, and your justification for the specific boundaries chosen:

**The APE will include all areas in which construction activities associated with the proposed Project will take place. The surficial ground disturbances will primarily be associated with vehicle access within the disturbed ROW to complete the switch replacement. 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 miles (mi) of the undertaking. While there are buildings adjacent to the Study Area that are over 50 years of age, removal and replacement of the existing switches will not create new visual impacts. No tree clearing is anticipated.**

- E. Provide a detailed description of the project. This is a critical part of your submission. Your description should be prepared for a cold reader who may not be an expert in this type of project. The information provided must help support your analysis of effects to historic properties, not other types of project impacts. Do not simply include copies of environmental documents or other types of specialized project reports. If there are multiple project alternatives, you should include information about all alternatives that are still under active consideration:

**The proposed Project will involve the replacement of an existing A-296 switch on the Niles-Niles Central 138kV transmission line. All work will be contained within existing ROW and utilized existing asphalt parking areas.**

### **SECTION 3: IDENTIFICATION OF HISTORIC PROPERTIES**

Describe whether there are historic properties located within your project APE. To make that determination, use information generated from your own Background Research and Field Survey. Then choose one of the following options to report your findings. Please refer to the Instructions and/or contact an OHPO reviewer if you are unsure about how to identify historic properties for your project.

**TRC performed a desktop review based on data received from the Ohio History Connection (OHC) on November 29, 2024, 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 no NRHP-listed above-ground historic resources, Ohio Genealogical Society (OGS) Cemeteries, archaeological surveys, or archaeological sites recorded within one (1)-mi of the Study Area. There are 78 above-ground historic resources that have not yet been evaluated for NRHP eligibility recorded within one (1)-mi. The nearest of these resources is situated 0.52 mi to the west.**

**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 1856, the region had been settled with widely spaced buildings along established roadways outside the City of Niles, which had been established to the west and contained the densest population. A railroad line had been constructed south of the Study Area. A single building attributed to *H. Baldwin* was recorded to the northwest of the Study Area (Attachment 2, Image 1) (Browne 1856).**

**In 1874, the overall landscape remained similar. The City of Niles expanded in size as the suburbs expanded in response to an increasing population. Several new railroad lines were constructed throughout the region. The Study Area was entirely on a parcel attributed to the *H.T. Mason*. No buildings were mapped in the vicinity of the Study Area. The City of Niles remained the most populated area in the region (Attachment 2, Image 2) (Everts 1874).**

**The 1899 historic map displays a similar landscape with widely spaced buildings along the established roadways. The Study Area was located just outside the limits of the City of Niles on a parcel that remained attributed to *H.T. Mason*. No buildings were mapped in the Study Area; however, several were recorded in the vicinity along the roadway to the north. The railroad lines continued to dominate the landscape through Niles City. Three (3) smaller parcels had been subdivided on the *Baldwin* property to the south and north (Attachment 2, Image 3) (American Atlas Company 1899).**

**The 1954/1959 historic USGS maps display a rural landscape with development**

centered around the City of Niles. Housing developments were constructed to the north and east of the Study Area through the early to middle twentieth century. The existing utility line corridor was not yet constructed (Attachment 2, Image 4) (USGS 1954/1959).

From the mid-twentieth to late-twentieth and into the twenty-first century, the regional landscape surrounding the Study Area continued to grow as new residential developments and industrial areas were constructed in association with an increase in the regional population. The residential developments to the east and north continued to expand overlapping the Study Area. The railroad lines were removed, and the current utility corridor was constructed. The overall landscape within the Study Area has been disturbed.

*If you read the Instructions and you're still confused as to which reporting option best fits your project, or you are not sure if your project needs a survey, you may choose to skip this section, but provide as much supporting documentation as possible in all other Sections, then check the box in Section 5.A. to request preliminary comments from OHPO. After reviewing the information provided, OHPO will then offer comments as to which reporting option is best suited to document historic properties for your project. Please note that providing information to complete this Section will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.*

#### **Recording the Results of Background Research and Field Survey:**

- A. **Summary of discussions and/or consultation with OHPO** about this project that demonstrates how the Agency Official and OHPO have agreed that no Field Survey was necessary for this project (typically due to extreme ground disturbance or other special circumstances). Please **attach copies** of emails/correspondence that document this agreement. You must explain how the project's potential to affect both archaeological and historic resources were considered. **N/A**
- B. **A table that includes the minimum information** listed in the OHPO Section 106 Documentation Table (which is generally equivalent to the information found on an inventory form). This information must be printed and mailed with the Project Summary Form. To provide sufficient information to complete this Section, you must also include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated in the project APE. **N/A**
- C. **OHI (Ohio Historic Inventory) or OAI (Ohio Archaeological Inventory) forms-** New or updated inventory forms may be prepared using the OHI pdf form with data population capabilities, the Internet IForm, or typed on archival quality inventory forms. To provide sufficient information to complete this Section, you must include summary observations from your field survey and background research. You must also include eligibility determinations for each property that was evaluated in the project APE. **N/A**
- D. **A historic or archaeological survey report** prepared by a qualified consultant that meets professional standards. The survey report should meet the Secretary of the Interior's Standards and Guidelines for Identification and OHPO Archaeological Guidelines. You may also include new inventory forms with your survey or update previous inventory forms. To complete this section, your survey report must include summary observations from your field survey, background research and eligibility determinations for each property that was evaluated within the APE. **N/A**
- E. **Project Findings.** Based on the conclusions you reached in completing Section 3, please choose one finding for your project. There are (mark one):  
Historic Properties Present in the APE: **N/A**

No Historic Properties Present in the APE: **N/A**

#### **SECTION 4: SUPPORTING DOCUMENTATION**

This information must be provided for all projects.

- A. Photographs must be keyed to a street-level map and should be included as attachments to this application. Please label all forms, tables, and CDs with the date of your submission and project name, as identified in Section 1. You must present enough documentation to clearly show existing conditions at your project site and convey details about the buildings, structures or sites that are described in your submission. Faxed or photocopied photographs are not acceptable. See Instructions for more info about photo submissions or 36 CFR § 800.11 for federal documentation standards.
  - 1. Provide photos of the entire project site and take photos to/from historic properties from/towards your project site to support your determination of effect in Section 5. **See Attachment 1 - Photographs**
  - 2. Provide current photos of all buildings/structures/sites described.
- B. Project plan, specifications, site drawings and any other media presentation that conveys detailed information about your project and its potential to affect historic properties.
- C. Copies or summaries of any comments provided by consulting parties or the public.

#### **SECTION 5: DETERMINATION OF EFFECT**

- A. **Request Preliminary Comments.** For challenging projects, provide as much information as possible in previous sections and ask OHPO to offer preliminary comments or make recommendations about how to proceed with your project consultation. This is recommended if your project involves effects to significant historic properties, if the public has concerns about your project's potential to affect historic properties, or if there may be challenging procedural issues related to your project. Please be aware that providing information in all Sections will still be required and that asking OHPO for preliminary comments may tend to delay completion of the review process for some projects.
  - 1. We request preliminary comments from OHPO about this project:  
**YES**
  - 2. Please specify as clearly as possible the particular issues that you would like OHPO to examine for your project (for example- help with developing an APE, addressing the concerns of consulting parties, survey methodology, etc.):

**Please review the provided information and respond with your determination relative to the potential effects to cultural resources, if any.**

- B. **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 OHPO for concurrence, while considering public comments. Please select and mark one of the following determinations, then explain the basis for your decision on an attached sheet of paper:

**No historic properties will be affected** based on 36 CFR § 800.4(d) (1).

Please explain how you made this determination:

**No Adverse Effect** [36 CFR § 800.5(b)] on historic properties. This finding cannot be used if there are no historic properties present in your project APE. Please explain why the Criteria of Adverse Effect, [36 CFR Part 800.5(a) (1)], were found not to be applicable for your project:

**Adverse Effect** [36 CFR § 800.5(d) (2)] on historic properties. Please explain why the criteria of adverse effect, [36 CFR Part 800.5(a) (1)], were found to be applicable to your project. You may also include an explanation of how these adverse effects might be avoided, reduced or mitigated:

*Please send completed form and supporting documentation to our office through the [section106@ohiohistory.org](mailto:section106@ohiohistory.org) e-mail address. Note that file size is limited to 30 MB. The Ohio SHPO has a federally mandated review time of 30 calendar day. To check your submission was received and logged in for our review, please visit <https://www.ohiohistory.org/preserve/state-historic-preservation-office/hpreviews/section-106-project-status>.*

## REFERENCES

### American Atlas Company

1899 "Map of Weathersfield Township" in *Atlas of Trumbull County, Ohio*. Published by American Atlas Company. Electronic document, <https://historicmapworks.com/Map/US/63801/Weathersfield++Niles+City/Trumbull+County+1899/Ohio/> accessed December 2, 2024.

### Browne, P.J.

1856 Map of Trumbull County, Ohio. Published by Gillette Matthews and Company, Philadelphia, Pennsylvania. Electronic document, <https://www.loc.gov/resource/g4083t.la000680/?r=0.733,0.23,0.335,0.209,0>, accessed December 2, 2024.

### Everts, L.H.

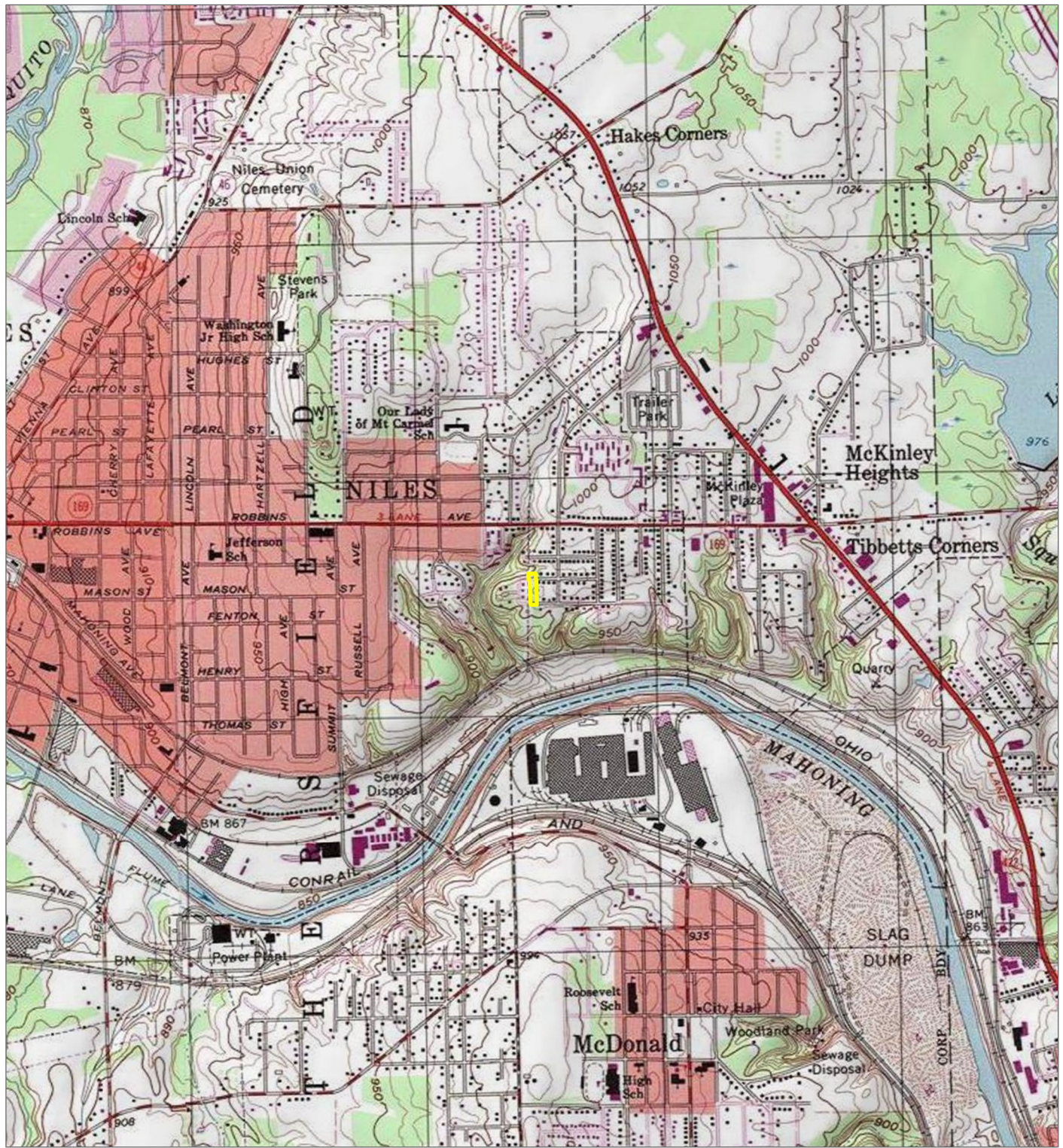
1874 "Map of Weathersfield Township" in *Combination Atlas Map of Trumbull County, Ohio*. Published by L.H. Everts, Chicago, Illinois. Electronic document, <https://historicmapworks.com/Map/US/20160/Weathersfield+Township/Trumbull+County+1874/Ohio/>, accessed December 2, 2024.


### United States Geographical Survey

1954 Girard, OH, 7.5-minute series topographic series. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#15/41.1729/-80.7394>, accessed December 2, 2024.



1959 Warren, OH, 7.5-minute series topographic series. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#15/41.1729/-80.7394>, accessed December 2, 2024.


COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH FIPS 3401 FEET, MAP ROTATION: 0  
 -- SAVED BY: MOPEL ON 12/22/2024, 13:23:12 PM. FILE PATH: T:\1-PROJECTS\FIRST\_ENERGY\429847\_0022\_0047\_NILES\CENTRAL\A-296\2-APR\106FORM.APRX. LAYOUT NAME: FIG01\_PLM



 PROJECT STUDY AREA

BASE MAP: USA TOPO MAPS MAP SERVICE , GIRARD QUAD

  
 0 1,000 2,000  
 FEET  
 1:24,000 1" = 2,000'  


PROJECT: <b>FIRSTENERGY</b> <b>NILES-NILES CENTRAL 138KV A-296 PROJECT</b> <b>TRUMBULL COUNTY, OH</b>	
TITLE: <b>PROJECT LOCATION MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: J. MCKISSICK	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: DECEMBER 2024	
	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	106FORM

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 -- Saved By: MOPEL on 12/2/2024, 13:30:26 PM. File Path: T:\1-PROJ\ECTS\First\_Energy\429847\_0022\_0047\_NilesCentral\A296\2-APRX\106Form.aprx. Layout Name: Fig02\_Aerial



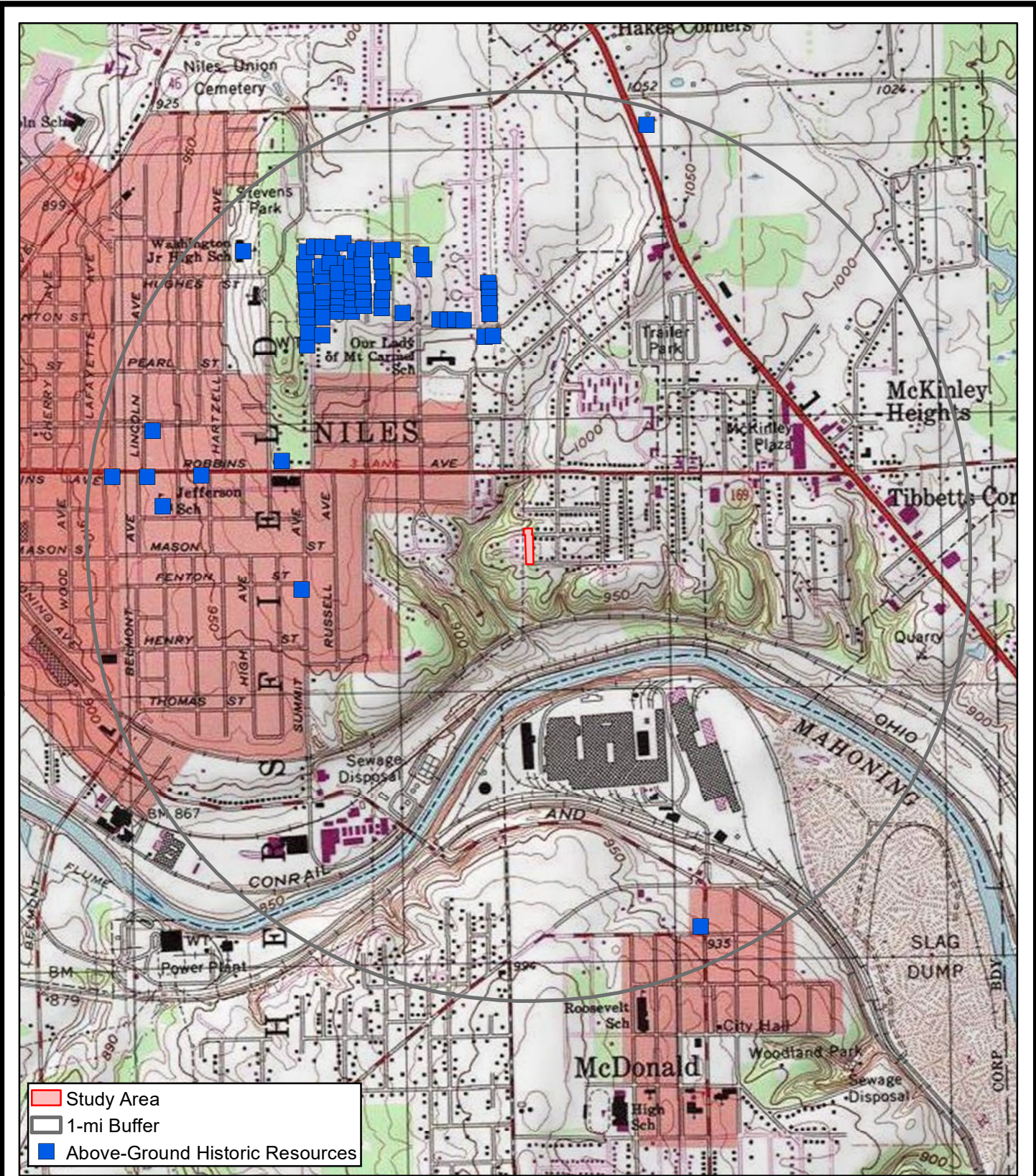
- PROJECT STUDY AREA
- EXISTING STRUCTURE
- MAPPED SOIL UNITS
- 1 PHOTO LOCATION



1:1,200  
 1" = 100'





PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>AERIAL BASEMAP WITH PHOTO LOCATIONS</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: J. MCKISSICK	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: DECEMBER 2024	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	106Form.aprx



- Study Area
- 1-mi Buffer
- Above-Ground Historic Resources

BASEMAP FROM 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLE

N  
 1" = 1,667'  
 1:20,000  
  
 0 0.2  
 Miles  
  
 317 E. Carson Street  
 Suite 113  
 Pittsburgh, PA 15219  
 TRC - GIS

PROJECT:  
**Niles-Niles Central 138kV  
 A-296 Project**  
 TITLE:  
**OHPO Database Search Results Map**

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0047
FILE:	Niles_A296.mxd

**FIGURE 3**





**ATTACHMENT 1**  
**Photographs**

<b>Client Name:</b> FirstEnergy Corporation	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.</b> 429847.0022.0047
--	---	--

<b>Photo No. 1.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b> Facing south, viewing the Study Area.	

<b>Photo No. 2.</b>	
<b>Date:</b> 06/20/2024	
<b>Description:</b> Facing north, viewing the Study Area.	

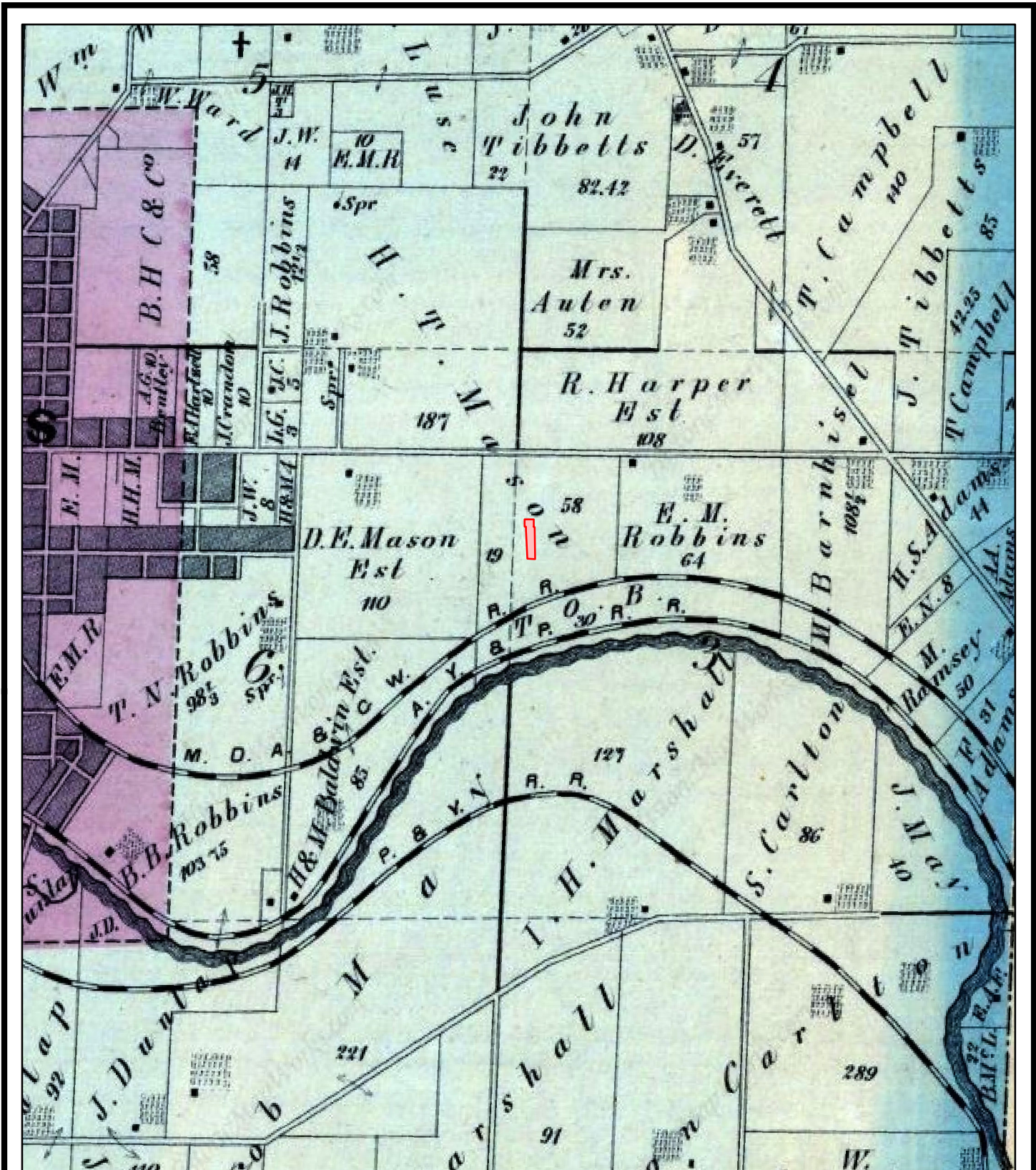
**ATTACHMENT 2**  
**Historic Map Images**



BASEMAP FROM MAP of TRUMBULL COUNTY, OHIO



\*Image overlay is approximate

<p>1" = 1,500' 1:18,000</p> <p>0 0.18 Miles</p> <p>317 E. Carson Street Suite 113 Pittsburgh, PA 15219</p> <p>TRC - GIS</p>	<p>PROJECT:</p> <p><b>Niles-Niles Central 138kV A-296 Project</b></p>	<p>DRAWN BY: JUSTIN MCKISSICK</p> <p>CHECKED BY: CURTIS BIONDICH</p> <p>APPROVED BY: CURTIS BIONDICH</p>
	<p>TITLE:</p> <p><b>Study Area circa 1856 (Browne)</b></p>	<p>DATE: DECEMBER 2024</p> <p>PROJ. NO.: 429847.0022.0047</p> <p>FILE: Niles_A296.mxd</p> <p><b>Attachment 2 - Image 1</b></p>



BASEMAP FROM COMBINATION ATLAS MAP of TRUMBULL 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:

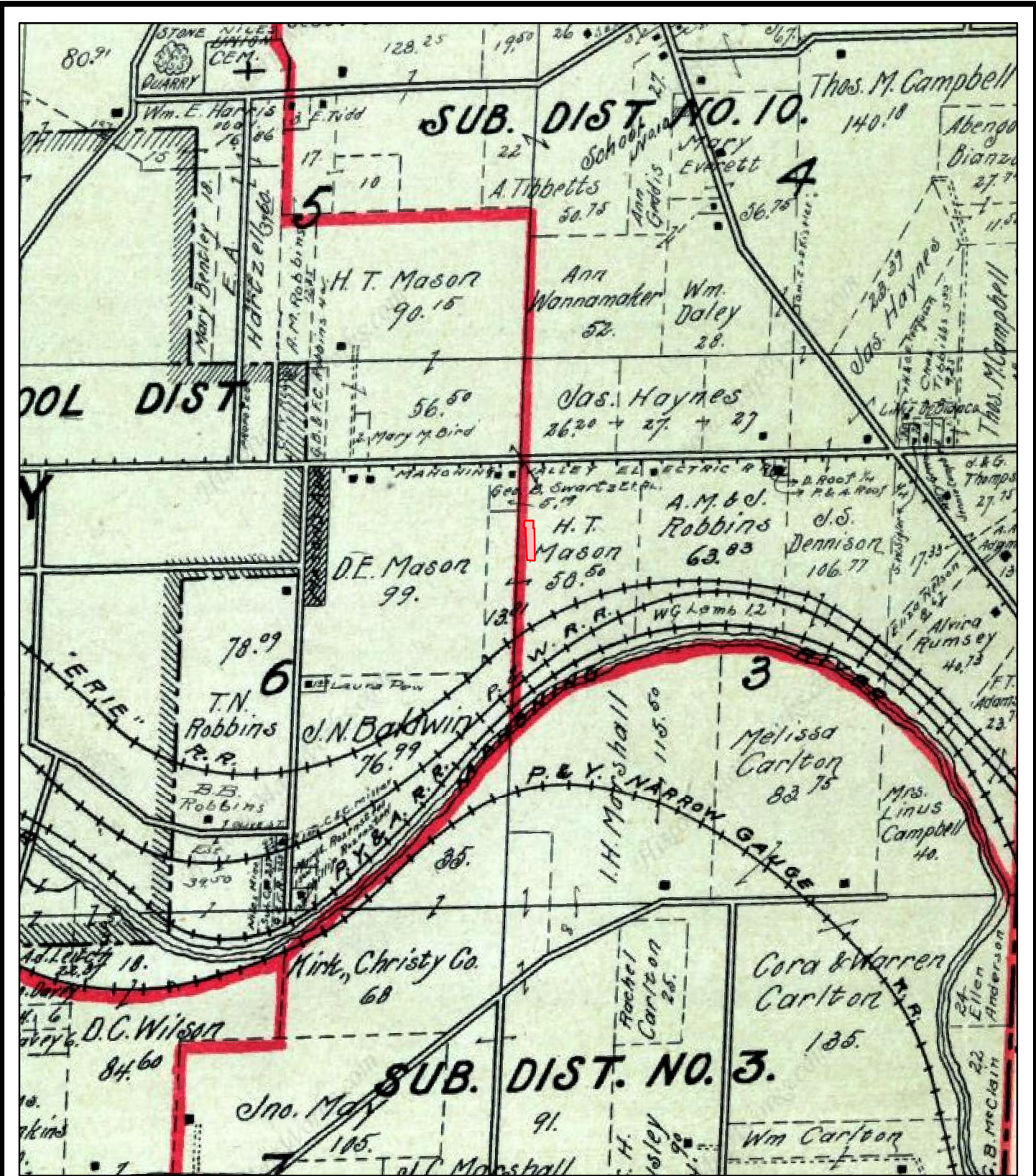
**Niles-Niles Central 138kV  
A-296 Project**

TITLE:

**Study Area circa 1874 (Everts)**

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0047
FILE:	Niles_A296.mxd

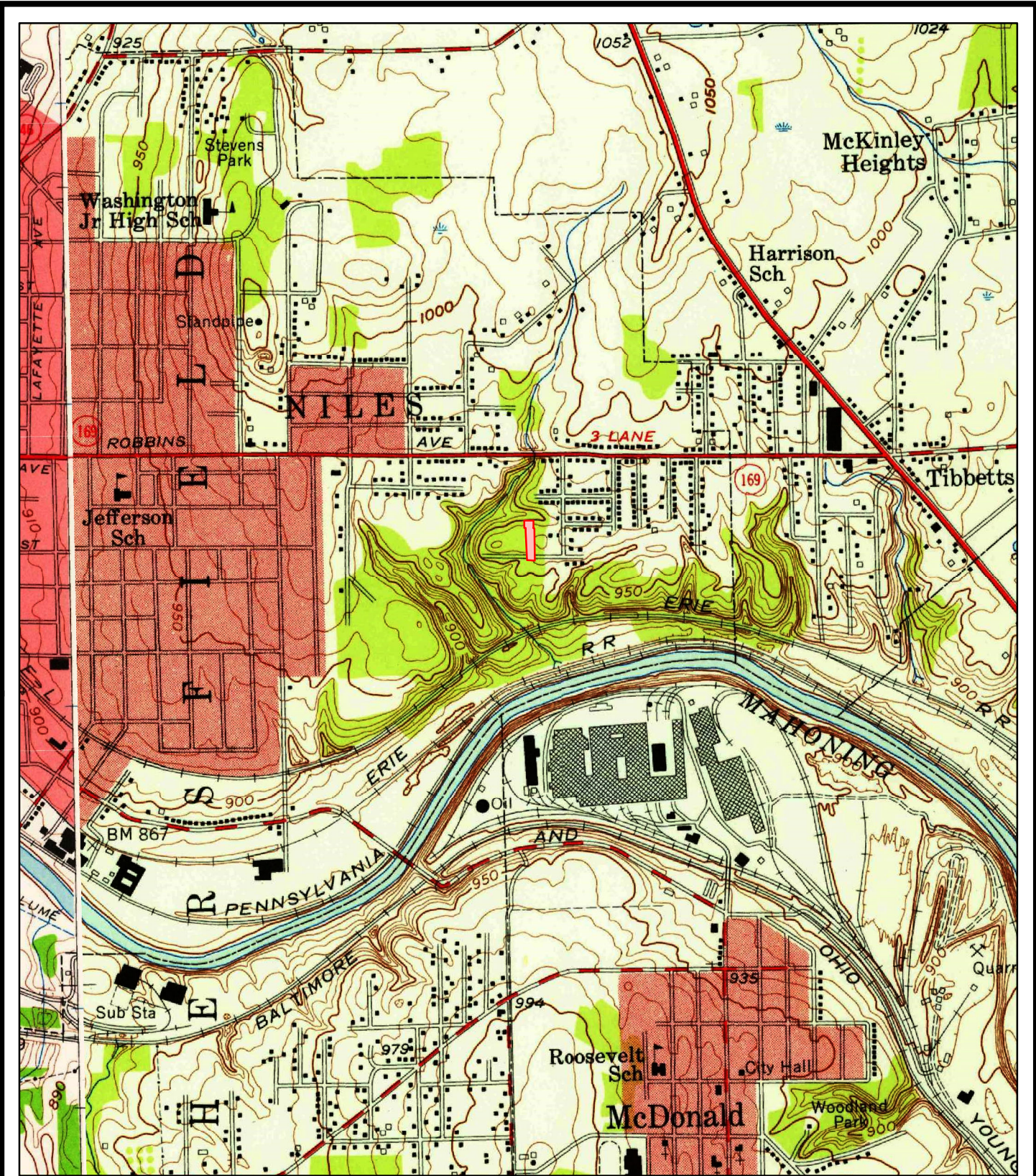
**Attachment 2 - Image 2**



BASEMAP FROM ATLAS of TRUMBULL COUNTY, OHIO



\*Image overlay is approximate

	PROJECT:	<b>Niles-Niles Central 138kV A-296 Project</b>	DRAWN BY:	JUSTIN MCKISSICK
	TITLE:	<b>Study Area circa 1899 (American Atlas Company)</b>	CHECKED BY:	CURTIS BIONDICH
317 E. Carson Street Suite 113 Pittsburgh, PA 15219			APPROVED BY:	CURTIS BIONDICH
TRC - GIS			DATE:	DECEMBER 2024
			PROJ. NO.:	429847.0022.0047
			FILE:	Niles_A296.mxd
			<b>Attachment 2 - Image 3</b>	



BASEMAP FROM 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLE

\*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:  
**Niles-Niles Central 138kV  
 A-296 Project**  
 TITLE:  
**Study Area circa 1954/1959 (USGS)**

DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	DECEMBER 2024
PROJ. NO.:	429847.0022.0047
FILE:	Niles_A296.mxd
<b>Attachment 2 - Image 4</b>	



**Office of Real Estate & Land Management**

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

October 4, 2024

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

**Re:** 24-1402 - Niles-Niles Central 138kV A-296

**Project:** The proposed project involves the replacement of switch A-296 on the existing Niles-Niles Central 138kV transmission line.

**Location:** The proposed project is located in Weathersfield Township, Trumbull 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  $\geq$  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 northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, and the mountain brook lamprey (*Ichthyomyzon greeleyi*), a state endangered fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. 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 eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects

that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. 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.

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.

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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.*



September 9, 2024

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 Niles-Niles Central 138kV A-296 Project located in the City of Niles, Trumbull County, Ohio.  
(TRC Project No. 429847.0022.0047)**

To Whom It May Concern,

On behalf of the FirstEnergy Corporation, TRC Environmental Corporation (TRC) is requesting an Environmental Review of the proposed Niles-Niles Central 138kV A-296 Project (Project) located in the City of Niles, Trumbull County, Ohio (**Figure 1: Site Location Map**).

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

Centroid: 41.179666, -80.731833

**County:** Trumbull County

**Project Description:** The proposed Project involves the replacement of switch A-296 on the existing Niles-Niles Central 138kV transmission line. The proposed Project Study Area is 0.914 acres, located in the City of Niles, Trumbull County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (**Figure 2: Aerial Map**) consists of an existing utility right-of-way (ROW) within residential land use and a paved parking lot. Currently as proposed, 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 utility ROW within residential land use and a paved parking lot.

Wetlands: The proposed Project Study Area does not include any National Wetlands Inventory features. A surface water delineation will be performed to determine the presence/absence of wetlands. Avoidance and minimization will be utilized during construction. If wetlands cannot be avoided, timber matting will be utilized during construction for avoidance.

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

Forested Area: The proposed Project Study Area contains minor forested habitat along the eastern edge of the existing utility ROW and residential land use. Currently as proposed, no tree clearing is anticipated within the Project Study Area.

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

Floodplains: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel (39155C0411D (eff. 6/18/2010)), 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 proposed 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) 998-0481 or via email at [JSlabe@TRCCompanies.com](mailto:JSlabe@TRCCompanies.com) if you have any questions or require additional information.

Regards,



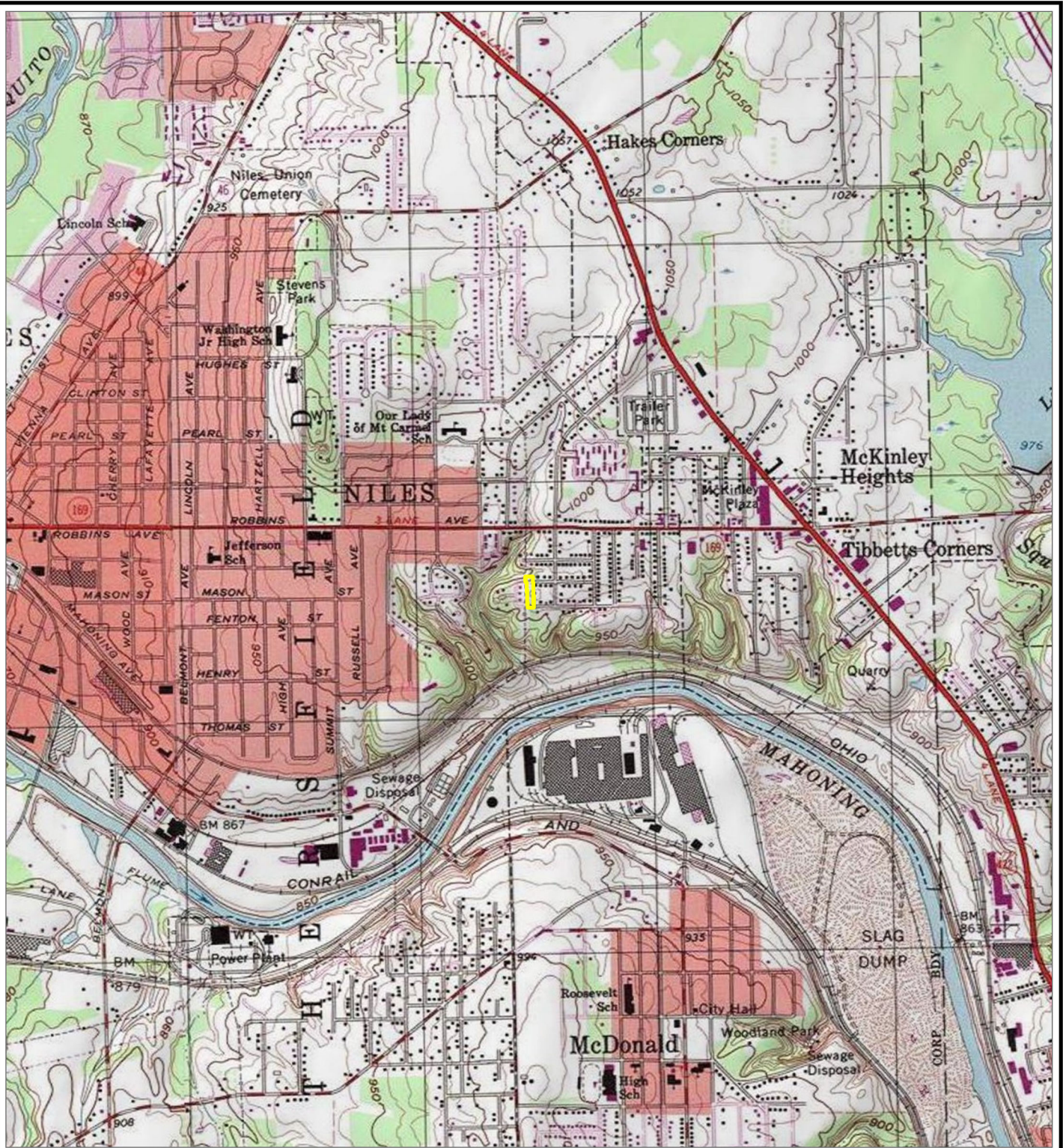
Jenna Slabe  
Ecologist

Attachments:

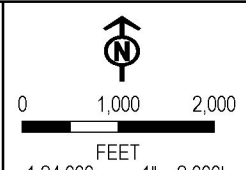
Figure 1: Site Location Map

Figure 2: Aerial Map

COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH RIPS 3401 FEET; MAP ROTATION: 0  
 -- SAVED BY: MOPEL ON 6/24/2024, 09:27:45 AM; FILE PATH: T:\1-PROJECTS\FIRST\_ENERGY\429847\_0022\_0047\_NILES\CENTRAL\A296\2-APPROX\WDR APPR; LAYOUT NAME: FIG01\_SLM



 PROJECT STUDY AREA



PROJECT: **FIRSTENERGY  
 NILES-NILES CENTRAL 138KV A-296 PROJECT  
 TRUMBULL COUNTY, OH**

TITLE: **SITE LOCATION MAP**

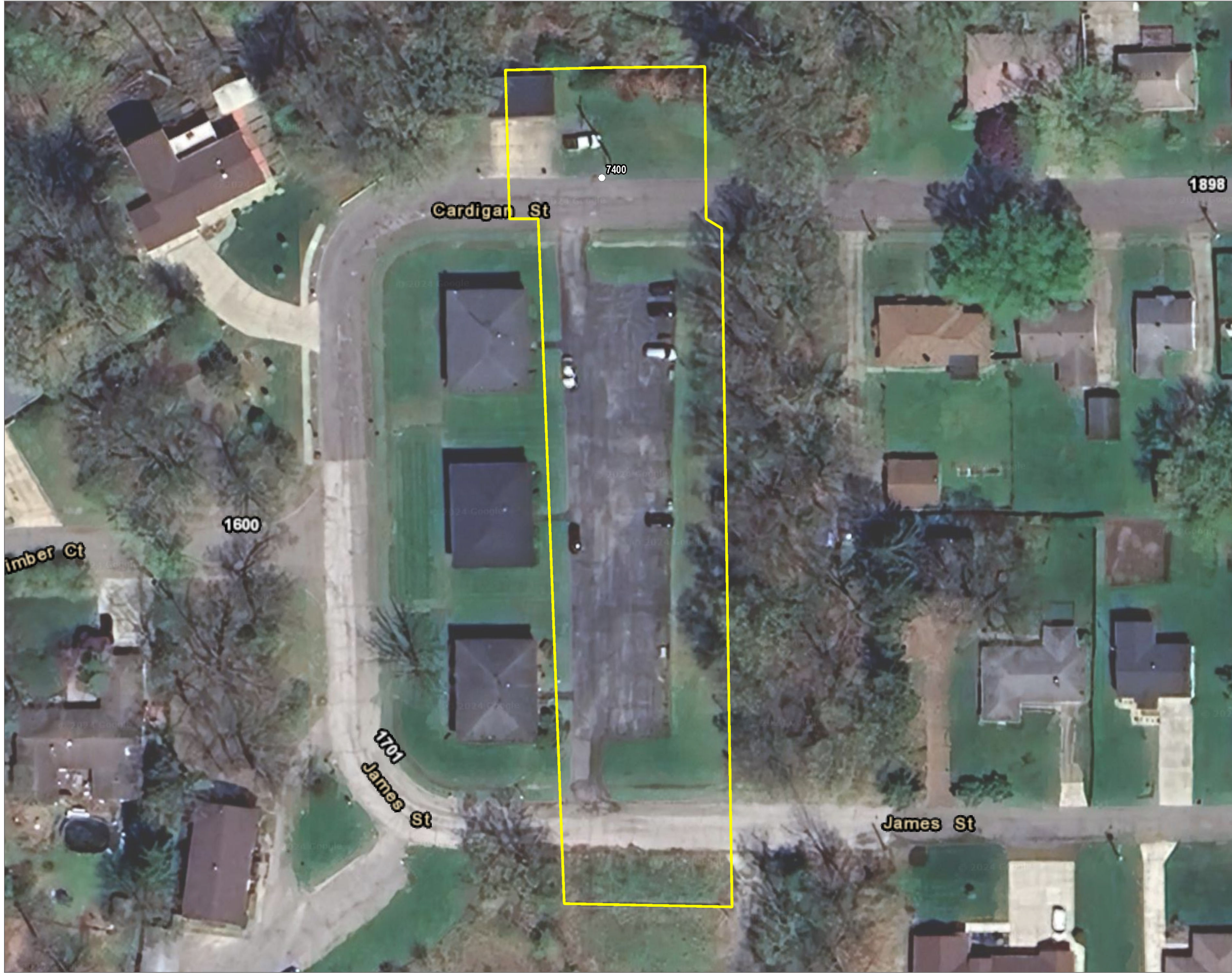
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: JUNE 2024	

BASE MAP: USA TOPO MAPS MAP SERVICE, GIRARD QUAD



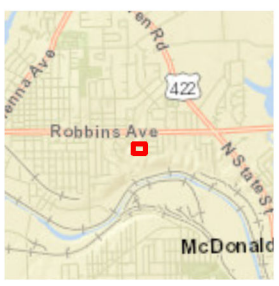
1382 WEST NINTH STREET  
 SUITE 400  
 CLEVELAND, OH 44113  
 PHONE: 216-344-3072

FILE: WDR



- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



1:600  
1" = 50'



PROJECT:		<b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE:		<b>AERIAL MAP</b>	
DRAWN BY:	M. OPEL	PROJ. NO.:	429847.0022.0047
CHECKED BY:	M. MOLNAR	<b>FIGURE 2</b>	
APPROVED BY:	B. FALKINBURG		
DATE:	JUNE 2024		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:			WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
-- Saved By: MOPEL on 6/24/2024, 09:27:45 AM; File Path: T:\1-PROJECTS\First\_Energy\429847\_0022\_0047\_NilesCentralA296\2-APRX\WDR.aprx; Layout Name: Fig02\_Aerial



**Department of  
Natural Resources**  
ohiodnr.gov

# EXHIBIT 6A

Mike DeWine, *Governor*  
Jon Husted, *Lt. Governor*  
Mary Mertz, *Director*

## Office of Real Estate & Land Management

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

October 4, 2024

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

**Re:** 24-1401 - Niles-Niles Central 138kV A-9030

**Project:** The proposed project involves the replacement of switch A-9030 on the existing Niles-Niles Central 138kV transmission line.

**Location:** The proposed project is located in Weathersfield Township, Trumbull County, Ohio.

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

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

Tower Mustard (*Turritis glabra*), P

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

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

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

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

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these 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 northern brook lamprey (*Ichthyomyzon fossor*), a state endangered fish, and the mountain brook lamprey (*Ichthyomyzon greeleyi*), a state endangered fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. 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 eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. 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.

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.

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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.*



September 9, 2024

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 Niles-Niles Central 138kV A-9030 Project located in the City of Niles, Trumbull County, Ohio.  
(TRC Project No. 429847.0022.0048)**

To Whom It May Concern,

On behalf of the FirstEnergy Corporation, TRC Environmental Corporation (TRC) is requesting an Environmental Review of the proposed Niles-Niles Central 138kV A-9030 Project (Project) located in the City of Niles, Trumbull County, Ohio (**Figure 1: Site Location Map**).

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

Centroid: 41.172942, -80.738931

**County:** Trumbull County

**Project Description:** The proposed Project involves the replacement of switch A-9030 on the existing Niles-Niles Central 138kV transmission line. The proposed Project Study Area is 2.453 acres, located in the City of Niles, Trumbull County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (**Figure 2: Aerial Map**) consists of an existing utility right-of-way (ROW) and gravel access roads within industrial land use and forested habitat. Currently as proposed, 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 utility ROW and gravel access roads within industrial land use and forested habitat.

Wetlands: The proposed Project Study Area does not include any National Wetlands Inventory features. A surface water delineation will be performed to determine the presence/absence of wetlands. Avoidance and minimization will be utilized during construction. If wetlands cannot be avoided, timber matting will be utilized during construction for avoidance.

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

Forested Area: The proposed Project Study Area contains forested habitat along the edges of the existing utility ROW and industrial-use gravel access roads. Currently as proposed, no tree clearing is anticipated within the Project Study Area.

Uplands: The proposed Project Study Area includes upland habitat within the existing utility ROW and gravel access roads within industrial land use and forested habitat.

Floodplains: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel (39155C0411D (eff. 6/18/2010)), a small portion of the southeastern end of the proposed Project is located within a FEMA-mapped 100-Year Flood Zone. No groundwork is proposed within the 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 proposed 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) 998-0481 or via email at [JSlabe@TRCCompanies.com](mailto:JSlabe@TRCCompanies.com) if you have any questions or require additional information.

Regards,

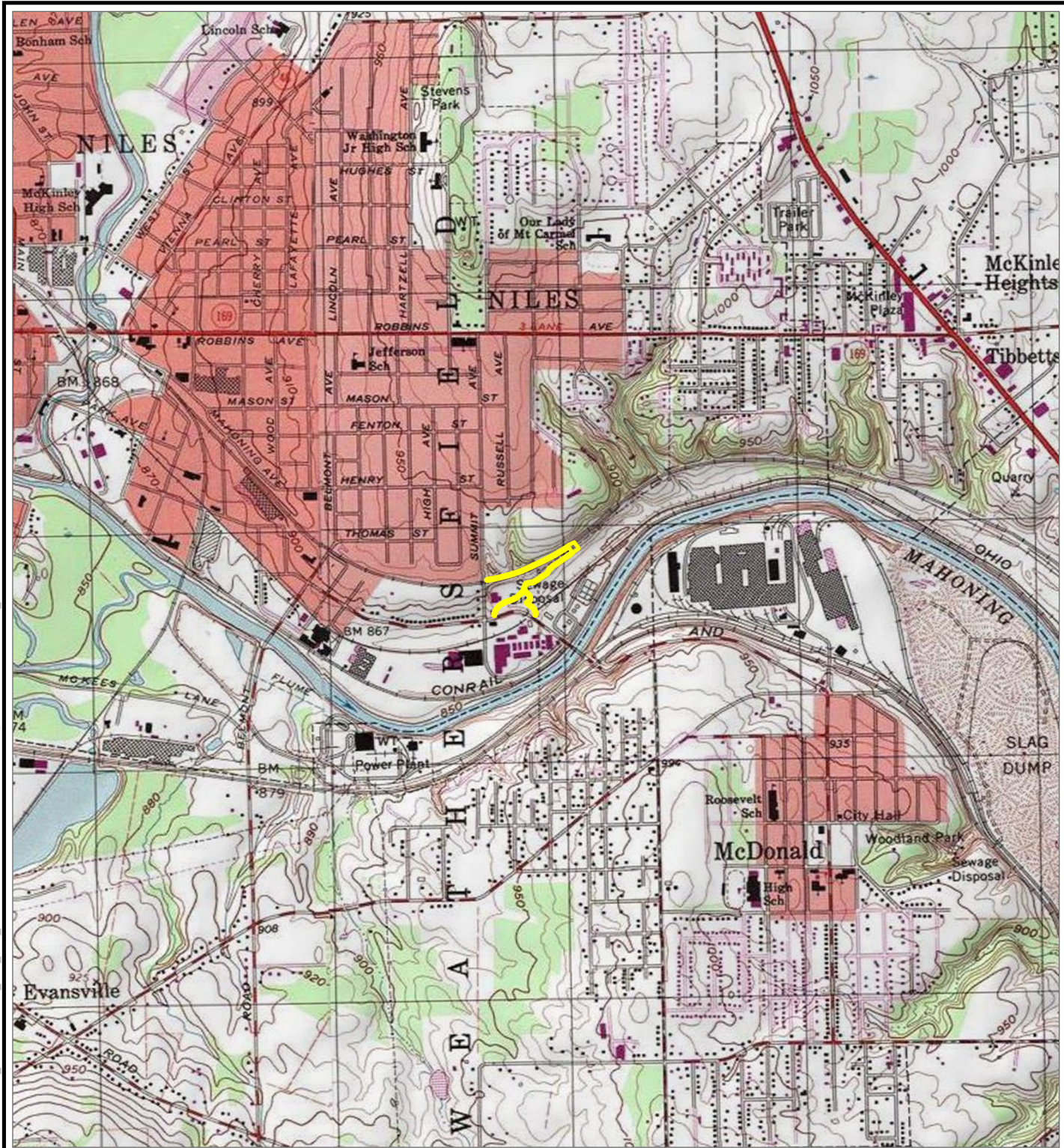


Jenna Slabe  
Ecologist

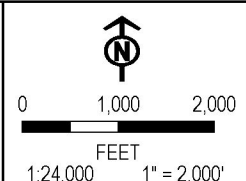
Attachments:

Figure 1: Site Location Map

Figure 2: Aerial Map



 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, GIRARD QUAD

PROJECT: **FIRSTENERGY**  
**NILES-NILES CENTRAL 138KV A-9030 PROJECT**  
**TRUMBULL COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: AUGUST 2024	

	1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072
	FILE: <span style="float: right;">WDR</span>

COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH RIPS 3401 FEET, MAP ROTATION: 0  
 -- SAVED BY: MOPEL ON 8/27/2024, 13:32:28 PM. FILE PATH: T:\1-PROJECTS\FIRST\_ENERGY\429847\_0022\_0048\_NILES\CENTRAL\A9030\2-APR\XWD\R\_APPX. LAYOUT NAME: FIG01\_SLM

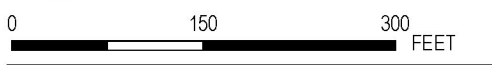


- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



1:1,800  
1" = 150'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: AUGUST 2024	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 - Saved By: MOPEL on 8/27/2024, 13:32:28 PM. File Path: T:\1-PROJECTS\FIRST\_Energy\429847\_0022\_0048\_NilesCentral\A9030\138KV\WDR.aprx. Layout Name: Fig02\_Aerial

**Stolarski, Adrianna**

---

**From:** Eileen.Wyza@dnr.ohio.gov  
**Sent:** Tuesday, October 15, 2024 12:12 PM  
**To:** Van Nort, Erin  
**Cc:** Molnar, Maggie; Stolarski, Adrianna  
**Subject:** RE: [EXTERNAL] RE: Desktop Hibernacula Assessment - FirstEnergy Niles-Niles Central 138kV A-296 Switch

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

Hello Erin,

Per review of the desktop survey provided for the FirstEnergy Niles-Niles Central 138kV A-296 Switch Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Therefore, any necessary tree removal is not likely to impact hibernating bats. Because there is an abandoned underground mine within 5 miles of the project area, DOW recommends that subsurface disturbance that may impact the bedrock occur between April 1 and September 30 to minimize potential disturbance of bats that could be present in the underground mine.

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 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.*

<EVanNort@trccompanies.com>

**Sent:** Tuesday, October 15, 2024 11:56 AM

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

---

**From:** Van Nort, Erin

**Cc:** Molnar, Maggie <MMolnar@trccompanies.com>; Stolarski, Adrianna <astolarski@firstenergycorp.com>  
**Subject:** RE: [EXTERNAL] RE: Desktop Hibernacula Assessment - FirstEnergy Niles-Niles Central 138kV A-296 Switch

Hello Eileen,

We do not currently have any Geotech data. Would you be able to send us the recommendations on the subsurface disturbance assuming bedrock is within 15 ft of the surface.

Thank you,  
Erin

**Erin Van Nort, PWS**

Senior Wetland Scientist  
Planning, Permitting, and Licensing



1382 W 9<sup>th</sup> St, Suite 400, Cleveland, OH 44113  
C 216.347.3342  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** [Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov) <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>  
**Sent:** Tuesday, October 15, 2024 8:16 AM  
**To:** Van Nort, Erin <[EVanNort@trccompanies.com](mailto:EVanNort@trccompanies.com)>  
**Cc:** Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>; Stolarski, Adrianna <[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)>  
**Subject:** RE: [EXTERNAL] RE: Desktop Hibernacula Assessment - FirstEnergy Niles-Niles Central 138kV A-296 Switch

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 Erin,

Thank you for the info! It would be great to know where the bedrock is in this area if anyone on the project has that information. If not, I can provide recommendations on the subsurface disturbance assuming bedrock is within 15 ft of the surface.

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 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:** Van Nort, Erin <[EVanNort@trccompanies.com](mailto:EVanNort@trccompanies.com)>  
**Sent:** Monday, October 14, 2024 3:25 PM  
**To:** Wyza, Eileen <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>  
**Cc:** Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>; Stolarski, Adrianna <[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)>  
**Subject:** RE: [EXTERNAL] RE: Desktop Hibernacula Assessment - FirstEnergy Niles-Niles Central 138kV A-296 Switch

Hello Eileen,

Yes, there will be ground disturbance as the new structure in the area will be replaced with a steel pole that will have a foundation. The foundation is still in design but shouldn't be more than 15 feet deep. If you need more design information we can see about getting more details for you.

Thank you,  
ERin

**Erin Van Nort, PWS**  
Senior Wetland Scientist  
Planning, Permitting, and Licensing



1382 W 9<sup>th</sup> St, Suite 400, Cleveland, OH 44113  
C 216.347.3342  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](http://TRCcompanies.com)

---

**From:** [Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov) <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>  
**Sent:** Friday, October 11, 2024 8:12 AM  
**To:** Van Nort, Erin <[EVanNort@trccompanies.com](mailto:EVanNort@trccompanies.com)>  
**Cc:** Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>  
**Subject:** [EXTERNAL] RE: Desktop Hibernacula Assessment - FirstEnergy Niles-Niles Central 138kV A-296 Switch



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.

Hello Erin,

Thank you for the report. Is any subsurface disturbance planned for this project? If so, could you please detail it for me?

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 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.*

**From:** Van Nort, Erin

*Please consider the environment before printing this email.*

<[EVanNort@trccompanies.com](mailto:EVanNort@trccompanies.com)>

**Sent:** Thursday, October 10, 2024 3:18 PM

**To:** Wyza, Eileen <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>

**Cc:** Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>

**Subject:** Desktop Hibernacula Assessment - FirstEnergy Niles-Niles Central 138kV A-296 Switch

Eileen,

Please find attached a Desktop Hibernacula Assessment, including mapping and a photographic record (PDF). This assessment was completed for a FirstEnergy project known as Niles-Niles Central 138kV A-296 Switch Project located in the city of Niles, Trumbull County Ohio.

If you need any additional information to complete this review, please feel free to contact us.

Thank you,  
Erin

**Erin Van Nort, PWS**  
Senior Wetland Scientist



1382 W 9<sup>th</sup> St, Suite 400, Cleveland, OH 44113

C 216.347.3342

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [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.

October 10, 2024

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 Niles-Niles Central 138kV A-296 Switch Project located in the city of Niles, Trumbull County, Ohio.  
(TRC Project No. 429847.0022.0047)**

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 Niles-Niles Central 138kV A-296 Switch Project (Project) Study Area. The proposed Project is located in the city of Niles, Trumbull County, Ohio (**Appendix A, Figure 1, and Figure 2**). The Project involves the replacement of switch A-296 on the existing Niles-Niles Central 138kV transmission line. The Project Study Area is approximately 0.914-acre in size, consisting of an existing utility right-of-way within residential land use, including both single and multi-family (**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, 2024), karst topography mapping (ODNR, Karst Interactive Map, ODNR Division of Geological Survey, 2024a), mine data mapping (ODNR, Mines of Ohio, ODNR Division of Mineral Resources, 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, Figures 4A and 4B**). The nearest historic surface mine is located approximately 15-miles southeast of the Project Study Area; the nearest surface industrial mine is located approximately 3-miles west of the Project Study Area; the nearest underground industrial mine is located 19-miles southeast of the Project Study Area; the nearest surface coal mine is located 14-miles south of the Project Study Area; and the nearest abandoned underground coal mine is located 2.5-miles south of the Project Study Area. The Project Study Area is not located within a karst region and is located approximately 99-miles east of the nearest mapped karst topographic region.

In addition, a surface water delineation was conducted by TRC on June 20, 2024, at which time summer and winter bat habitat was concurrently assessed. Based on the field investigations, no summer or winter bat habitat, or caves were identified within the Project Study Area. During field

investigations, photographs of the Project Study Area were taken, which depict the site conditions (**Appendix B**).

Due to the surrounding residential land use, and that no summer or winter bat habitat, or caves or caverns were observed within the Project Study Area during field surveys, it is TRC's opinion that federally- or state- listed bat species are not likely to be impacted by this proposed Project. In addition, if minor tree clearing is needed because of the Project, it will take place within the United States Fish and Wildlife Service's 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 directly at (216) 347-3342 or electronically at [evannort@trccompanies.com](mailto:evannort@trccompanies.com) if you have any questions or require additional information.

Regards,

**TRC Environmental Corporation**



Erin Van Nort  
Senior Wetland Scientist

**Appendices:**

Appendix A: Figures

- Figure 1: Site Location Map
- Figure 2: Aerial Map
- Figure 3: National Land Cover Database Map
- Figure 4A: Karst Map
- Figure 4B: Mine Map

Appendix B: Photographic Record

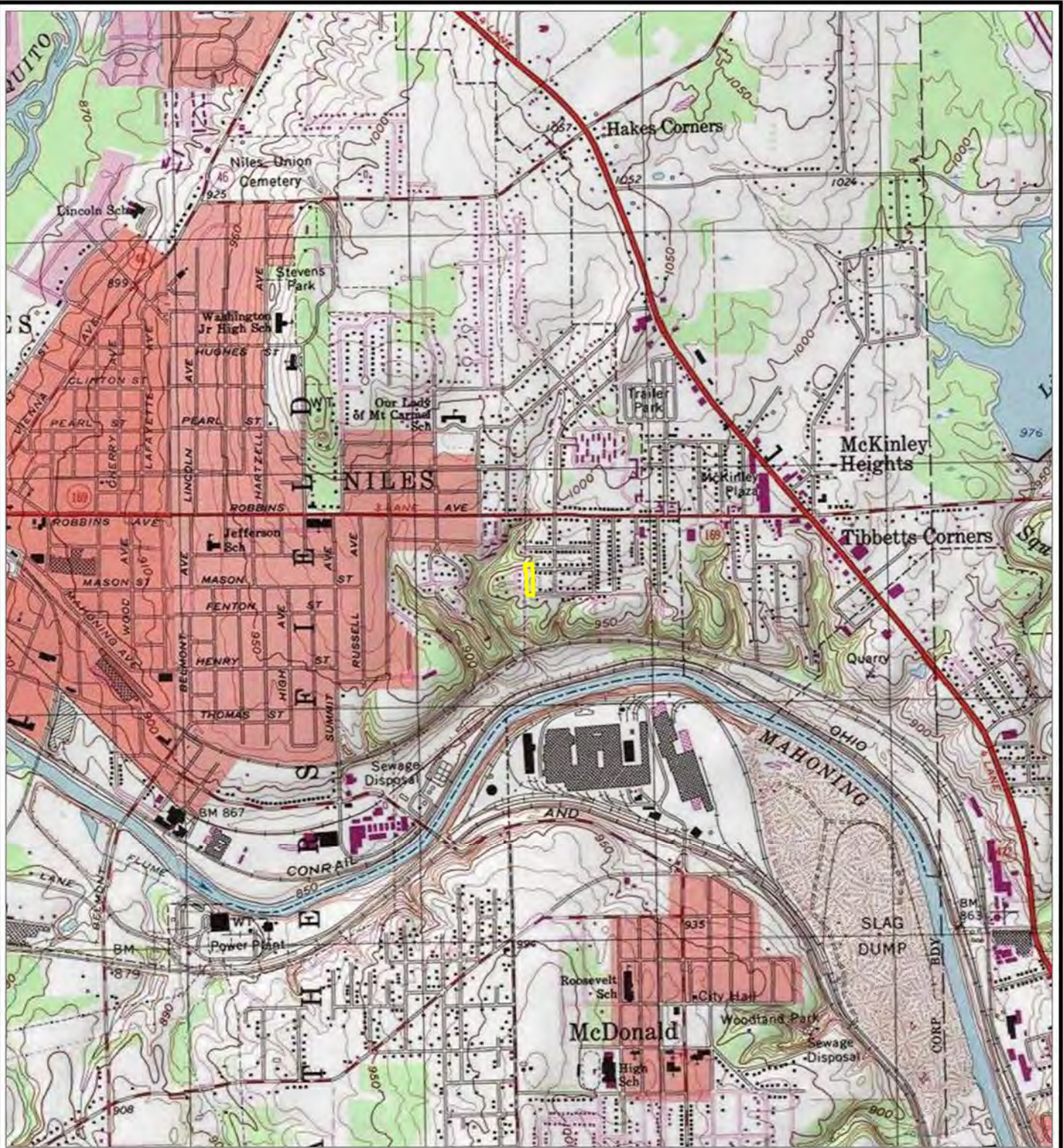
## References


- Google Earth. (2024). Google Earth Images of Project Area. *Date accessed October, 2024.*
- ODNR. (2024a). *Karst Interactive Map, ODNR Division of Geological Survey.* Retrieved from [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 <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**


COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH FIPS 3401 FEET MAP ROTATION: 0  
 - SAVED BY: MOPEL ON: 10/27/2024, 16:40:11 PM: FILE PATH: T:\PROJECTS\FIRST ENERGY\429847\24-APPROX\HIBERNACULA\ASSESSMENT\APRXY\_LAYOUT\NAME\_FIG01\_SLM



 PROJECT STUDY AREA

BASE MAP: USA TOPO MAPS MAP SERVICE, GIRARD QUAD

  
 0 1,000 2,000  
 FEET  
 1:24,000 1" = 2,000'  


PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>SITE LOCATION MAP</b>	
DRAWN BY: M. OPEL	PROJ NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
	
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  
- Saved By: MOPEL on 10/27/2024, 16:40:11 PM, File Path: T:\L-PROJECTS\Final\_Energy\429847\_0022\_0047\_NilesCentral\Assessment.aprx, Layout Name: Fig02\_Aerial

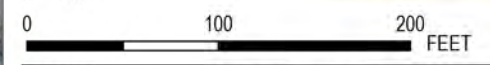



- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



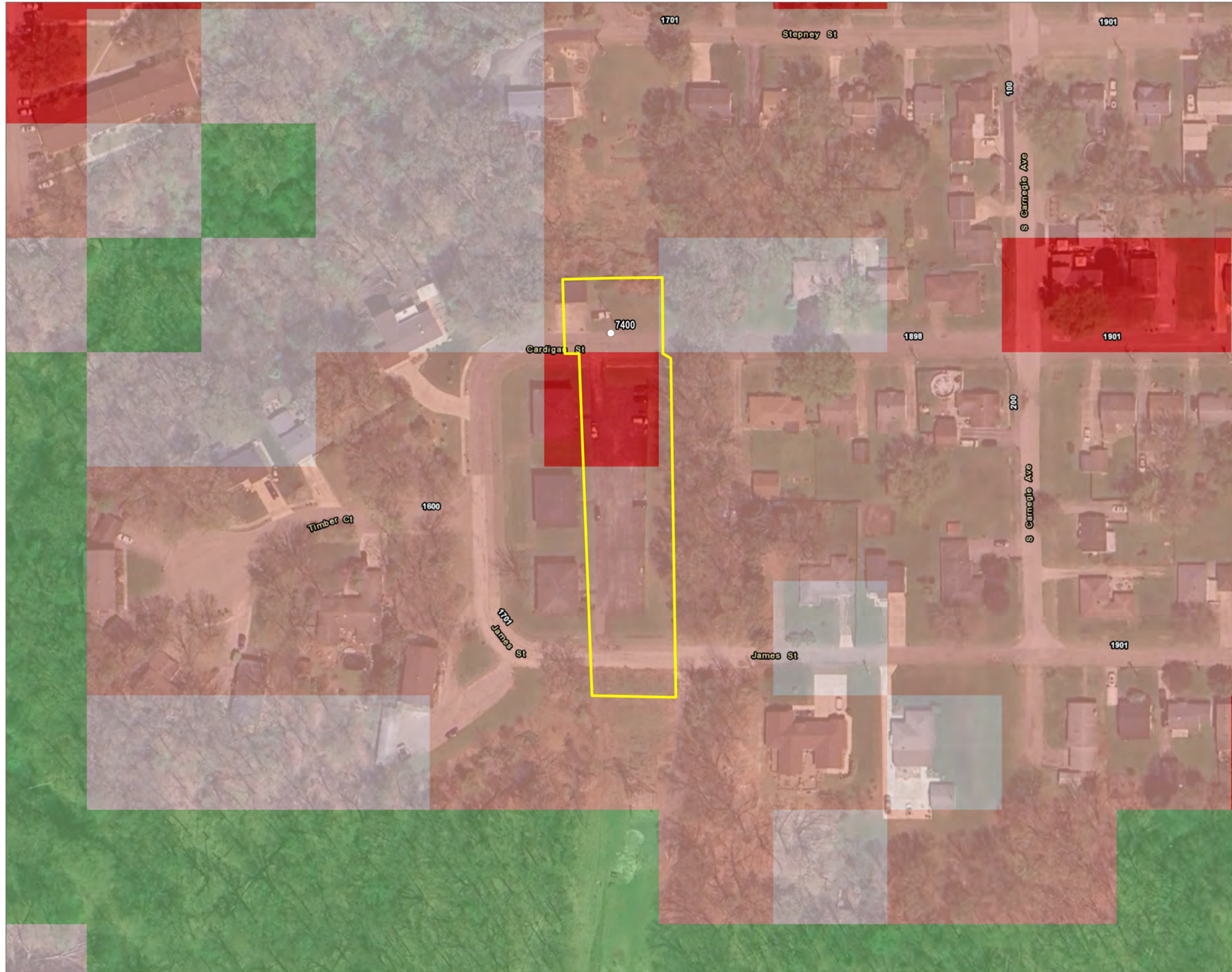
1:1,200  
1" = 100'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
	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  
 Saved By: MOPEL on 10/27/2024, 16:40:11 PM; File Path: T:\L-PROJECTS\Final\_Energy\429847\_0022\_0047\_NilesCentralA296A-296A\HibemaculaAssessment.aprx; Layout Name: Fig03\_NLCD



- PROJECT STUDY AREA
- EXISTING STRUCTURE
- NLCD LAND COVER CLASSIFICATION
- DECIDUOUS FOREST
- DEVELOPED, LOW INTENSITY
- DEVELOPED, MEDIUM INTENSITY
- DEVELOPED, OPEN SPACE

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

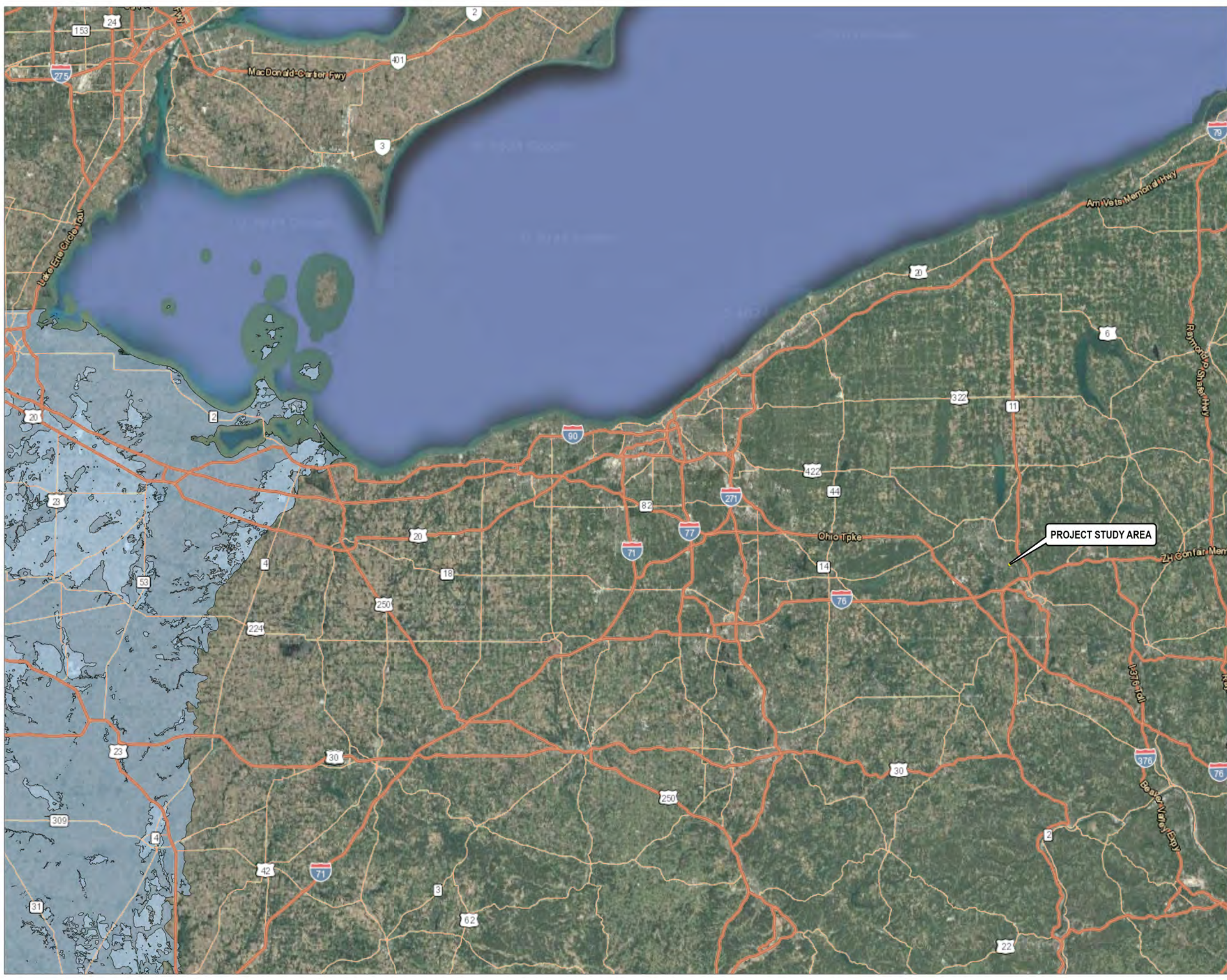


1:1,200  
 1" = 100'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>NATIONAL LAND COVER DATABASE MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 3</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
<span style="font-size: small; vertical-align: middle;">1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072</span>	
FILE:	HibemaculaAssessment.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 Saved By: MOPEL on 10/27/2024, 16:40:11 PM; File Path: T:\L-PROJECTS\Final\_Energy\429847\_0022\_0047\_NilesCentral\Assessment.aprx; Layout Name: Fig04A\_Karst

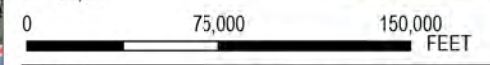


- PROJECT STUDY AREA
- KARST GEOLOGY**
- SILURIAN- AND DEVONIAN-AGE CARBONATE BEDROCK OVERLAIN BY LESS THAN 20 FEET OF GLACIAL DRIFT AND/OR ALLUVIUM
- SILURIAN- AND DEVONIAN-AGE CARBONATE BEDROCK OVERLAIN BY MORE THAN 20 FEET OF GLACIAL DRIFT AND/OR ALLUVIUM

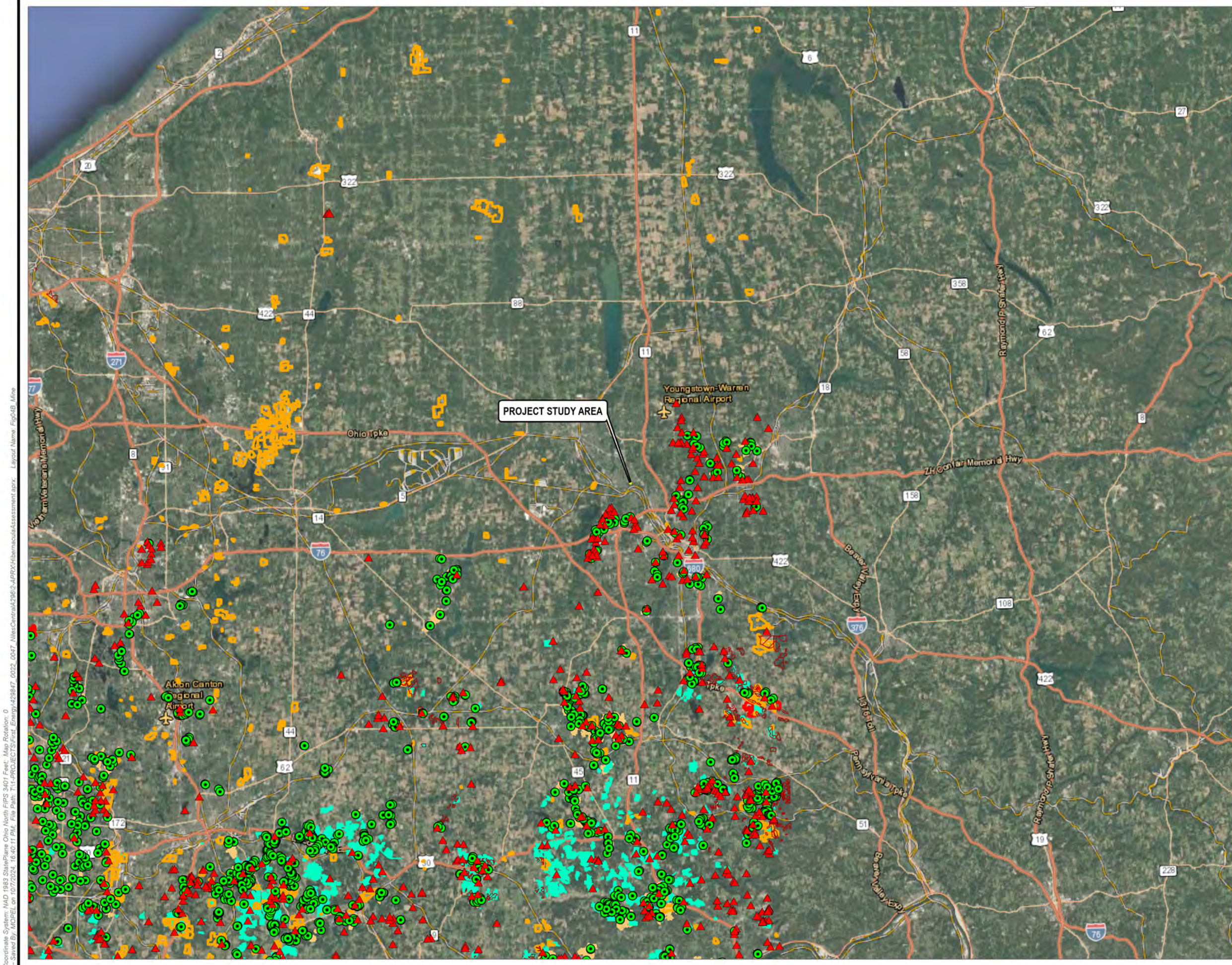
BASE MAP: GOOGLE MAPS.  
 DATA SOURCES: KARST DATA ACQUIRED FROM THE OHIO DEPARTMENT OF NATURAL RESOURCES-DIVISION OF GEOLOGICAL SURVEY, MAY 2024.



1:900,000  
 1" = 75,000'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>KARST MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 4A</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
<span style="font-size: small; vertical-align: middle;">1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072</span>	
FILE: HibernaculaAssessment.aprx	

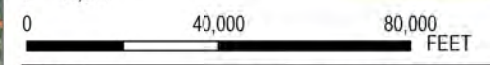


- PROJECT STUDY AREA
- ABANDONED MINE OPENING
- ABANDONED MINE - MINE POINT EXTENT UNKNOWN
- SURFACE COAL MINE
- HISTORIC SURFACE MINE
- ABANDONED UNDERGROUND COAL MINE
- SURFACE INDUSTRIAL MINE
- UNDERGROUND INDUSTRIAL MINE

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



1:480,000  
 1" = 40,000'



<b>PROJECT:</b>		<b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
<b>TITLE:</b>		<b>MINE MAP</b>	
<b>DRAWN BY:</b>	M. OPEL	<b>PROJ. NO.:</b>	429847.0022.0047
<b>CHECKED BY:</b>	M. MOLNAR	<b>FIGURE 4B</b>	
<b>APPROVED BY:</b>	B. FALKINBURG		
<b>DATE:</b>	OCTOBER 2024		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
<b>FILE:</b>		HibemaculaAssessment.aprx	

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 - Saved By: MDEP on 10/7/2024, 16:40:11 PM; File Path: T:\PROJECTS\First\_Energy\429847\_0022\_0047\_NilesCentral\Assessment.aprx; Layout Name: Fig04B\_Mine

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

<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0047
------------------------------------	---	---

**Photo No. 1.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the southeast extent of Project Study Area, facing north.



**Photo No. 2.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the southwest extent of Project Study Area, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0047
------------------------------------	---	---

**Photo No. 3.**

**Photo Date:**  
6/20/2024

**Description:**

Representative photo from the northwest extent of Project Study Area, facing south.



**Photo No. 4.**

**Photo Date:**  
6/20/2024

**Description:**

Representative photo from the northeast extent of the Project Study Area, facing south.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0047
------------------------------------	---	---

**Photo No. 5.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the southwest extent of the Project Study Area, facing north.



**Photo No. 6.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the southwestern extent of the Project Study Area, facing west.



**Stolarski, Adrianna**

---

**From:** Eileen.Wyza@dnr.ohio.gov  
**Sent:** Tuesday, October 22, 2024 8:42 AM  
**To:** Stolarski, Adrianna; Slabe, Jenna  
**Cc:** Falkinburg, Brad M (Ruszala, Amy M); Molnar, Maggie  
**Subject:** [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Niles-Niles Central 138kV A-9030 Project

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

Hello Adrianna,

Thank you for the information. Per review of the desktop survey provided for the FirstEnergy Niles-Niles Central 138kV A-9030 Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Therefore, any necessary tree removal is not likely to impact hibernating bats. Because there is an abandoned underground mine within 5 miles of the project area, DOW recommends that subsurface disturbance that may impact the bedrock occur between April 1 and September 30 to minimize potential disturbance of bats that could be present in the underground mine.

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 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:**  
 Stolarski,  
 Adrianna

<astolarski@firstenergycorp.com>  
**Sent:** Monday, October 21, 2024 11:17 AM  
**To:** Wyza, Eileen <Eileen.Wyza@dnr.ohio.gov>; Slabe, Jenna <JSlabe@trccompanies.com>  
**Cc:** Falkinburg, Brad M (Ruszala, Amy M) <bfalkinburg@trccompanies.com>; Molnar, Maggie



<MMolnar@trccompanies.com>

**Subject:** RE: Desktop Hibernacula Assessment: FirstEnergy's Niles-Niles Central 138kV A-9030 Project

Good morning,

The geotechnical report has not been finalized yet, so I do not know the bedrock depth. Due to the collocation with other utilities, blasting is not proposed for foundation work.

Thanks,



**Adrianna Stolarski**

Adv Scientist

cell: 304-816-1875 | office: 304-534-7525

[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)

5001 Nasa Boulevard, Fairmont, WV 26554 | mailstop: WV-MP / Fairmont MonPower-Transmission

---

**From:** [Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov) <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>

**Sent:** Monday, October 21, 2024 9:29 AM

**To:** Stolarski, Adrianna <[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)>; Slabe, Jenna <[JSlabe@trccompanies.com](mailto:JSlabe@trccompanies.com)>

**Cc:** Falkinburg, Brad M (Ruszala, Amy M) <[bfalkinburg@trccompanies.com](mailto:bfalkinburg@trccompanies.com)>; Molnar, Maggie

<[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>

**Subject:** [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Niles-Niles Central 138kV A-9030 Project

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

Hi Adrianna,

Thank you for that information. You don't happen to know where the bedrock starts in this area, do you? Will blasting be the method used for the foundation work?

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 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:**  
Stolarski,  
Adrianna

<[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)>

**Sent:** Tuesday, October 15, 2024 8:56 AM

**To:** Wyza, Eileen <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>; Slabe, Jenna <[JSlabe@trccompanies.com](mailto:JSlabe@trccompanies.com)>

**Cc:** Falkinburg, Brad M (Ruszala, Amy M) <[bfalkinburg@trccompanies.com](mailto:bfalkinburg@trccompanies.com)>; Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>

**Subject:** RE: Desktop Hibernacula Assessment: FirstEnergy's Niles-Niles Central 138kV A-9030 Project

Good morning Eileen,

I just checked with our design team. Access to the sites will be completed using existing roads. Subsurface disturbance will encompass a foundation for the new structure that is not to exceed 17 feet deep for Switch A-9030.

Let us know if you need anything else.

Thanks,



**Adrianna Stolarski**

Adv Scientist

cell: 304-816-1875 | office: 304-534-7525

[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)

5001 Nasa Boulevard, Fairmont, WV 26554 | mailstop: WV-MP / Fairmont MonPower-Transmission

---

**From:** [Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov) <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>

**Sent:** Tuesday, October 15, 2024 8:18 AM

**To:** Slabe, Jenna <[JSlabe@trccompanies.com](mailto:JSlabe@trccompanies.com)>

**Cc:** Falkinburg, Brad M (Ruszala, Amy M) <[bfalkinburg@trccompanies.com](mailto:bfalkinburg@trccompanies.com)>; Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>; Stolarski, Adrianna <[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)>

**Subject:** [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy's Niles-Niles Central 138kV A-9030 Project

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

Hello Jenna,

Thank you for the report. Is any subsurface disturbance planned for this project? If so, could you please detail it for me?

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 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](mailto:JSlabe@trccompanies.com)>  
**Sent:** Monday, October 14, 2024 4:55 PM  
**To:** Wyza, Eileen <[Eileen.Wyza@dnr.ohio.gov](mailto:Eileen.Wyza@dnr.ohio.gov)>  
**Cc:** Falkinburg, Brad <[BFalkinburg@trccompanies.com](mailto:BFalkinburg@trccompanies.com)>; Molnar, Maggie <[MMolnar@trccompanies.com](mailto:MMolnar@trccompanies.com)>; Stolarski, Adrianna <[astolarski@firstenergycorp.com](mailto:astolarski@firstenergycorp.com)>  
**Subject:** Desktop Hibernacula Assessment: FirstEnergy's Niles-Niles Central 138kV A-9030 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 Niles-Niles Central 138kV A-9030 Project located in the city of Niles, Trumbull 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.

---

**The information contained in this message is intended only for the personal and confidential use of the recipient(s) named above. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately, and delete the original message.**

---

**The information contained in this message is intended only for the personal and confidential use of the recipient(s) named above. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately, and delete the original message.**

October 14, 2024

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 Niles-Niles Central 138kV A-9030 Project located in the city of Niles, Trumbull County, Ohio. (TRC Project No. 429847.0022.0048)**

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 Niles-Niles Central 138kV A-9030 Switch Project (Project) Study Area. The proposed Project is located in the city of Niles, Trumbull County, Ohio (**Appendix A, Figure 1, and Figure 2**). The Project involves the replacement of switch A-9030 on the existing Niles-Niles Central 138kV transmission line. The Project Study Area is 2.453 acres in size, consisting of an existing utility right-of-way and gravel access roads within industrial land use and forested habitat (**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, 2024), karst topography mapping (ODNR, Karst Interactive Map, ODNR Division of Geological Survey, 2024a), mine data mapping (ODNR, Mines of Ohio, ODNR Division of Mineral Resources, 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, Figures 4A and 4B**). The nearest historic surface mine is located approximately 15 miles southeast of the Project Study Area; the nearest surface industrial mine is located approximately 2 miles west of the Project Study Area; the nearest underground industrial mine is located 19 miles southeast of the Project Study Area; the nearest surface coal mine is located 13 miles south of the Project Study Area; and the nearest abandoned underground coal mine is located 2 miles south of the Project Study Area. The Project is also not located within a mapped karst region; the nearest karst region is located 98 miles west of the Project Study Area.

In addition, a surface water delineation was conducted by TRC on June 20, 2024, at which time winter bat habitat was concurrently assessed. Based on the field investigations, no winter bat habitat, or caves were identified within the Project Study Area. During field investigations, photographs of the Project Study Area were taken, which depict the site conditions (**Appendix B**).

Due to the use of existing gravel access roads during the proposed Project, and that no winter bat habitat, or caves or caverns were observed within the Project Study Area during field surveys, it is TRC's opinion that federally- or state- listed bat species are not likely to be impacted by the proposed Project. In addition, if minor tree clearing is needed because of the Project, it will take place within the United States Fish and Wildlife Service's 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 directly at (330) 998-0481 or electronically at [JSlabe@TRCCompanies.com](mailto:JSlabe@TRCCompanies.com) if you have any questions or require additional information.

Regards,

**TRC Environmental Corporation**



Jenna Slabe  
Ecologist

**Appendices:**

Appendix A: Figures

- Figure 1: Site Location Map
- Figure 2: Aerial Map
- Figure 3: National Land Cover Database Map
- Figure 4A: Karst Map
- Figure 4B: Mine Map

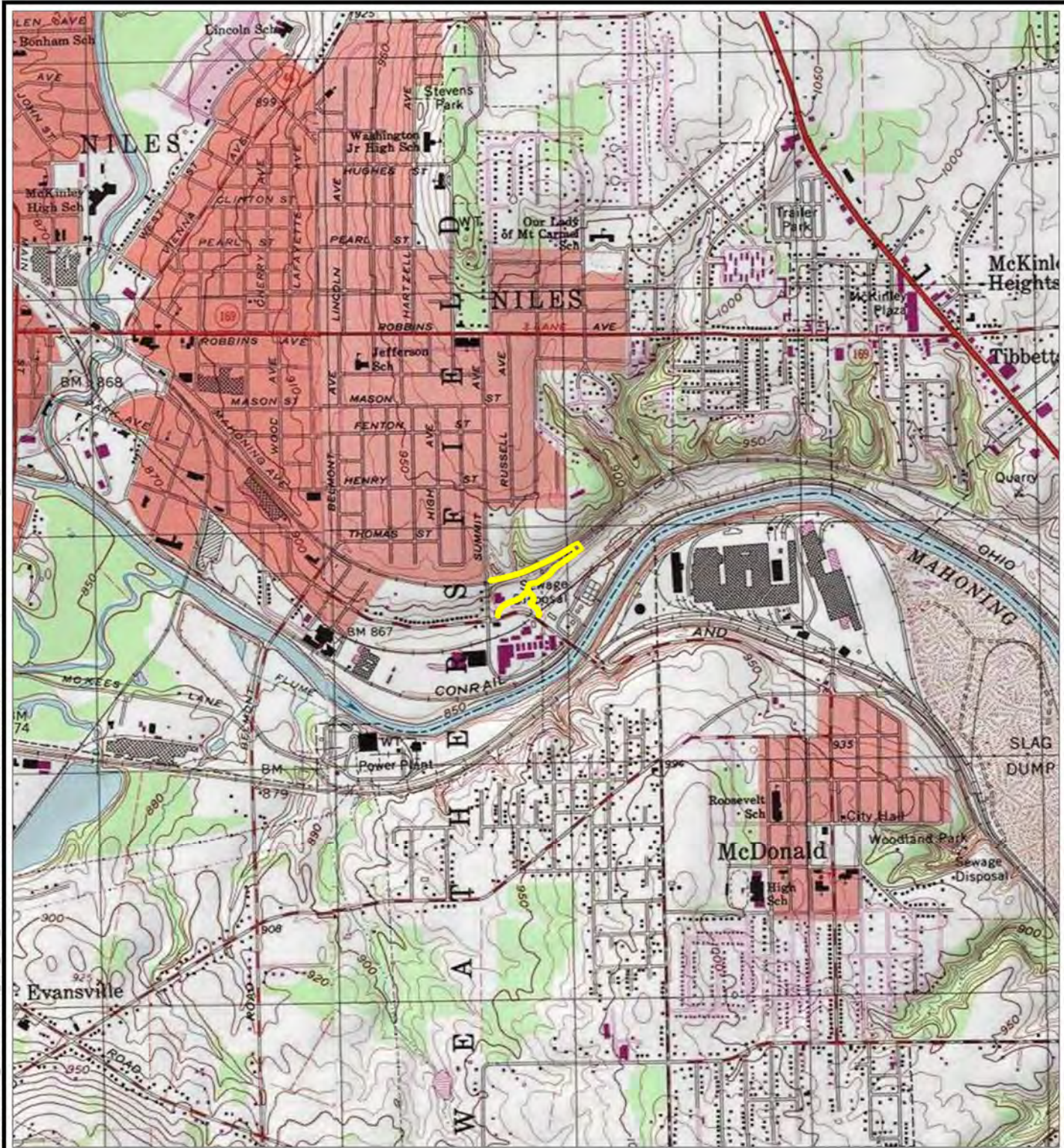
Appendix B: Photographic Record

## References

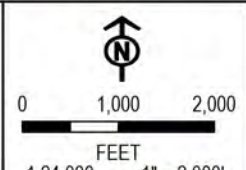
- Google Earth. (2024). Google Earth Images of Project Area. *Date accessed October, 2024.*
- ODNR. (2024a). *Karst Interactive Map, ODNR Division of Geological Survey.* Retrieved from [https://gis.ohiodnr.gov/website/dgs/karst\\_interactivemap/](https://gis.ohiodnr.gov/website/dgs/karst_interactivemap/)
- ODNR. (2024b). *Mines of Ohio, ODNR Division of Mineral Resources.* Retrieved from <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**





PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, GIRARD QUAD

PROJECT: **FIRSTENERGY  
NILES-NILES CENTRAL 138KV A-9030 PROJECT  
TRUMBULL COUNTY, OH**

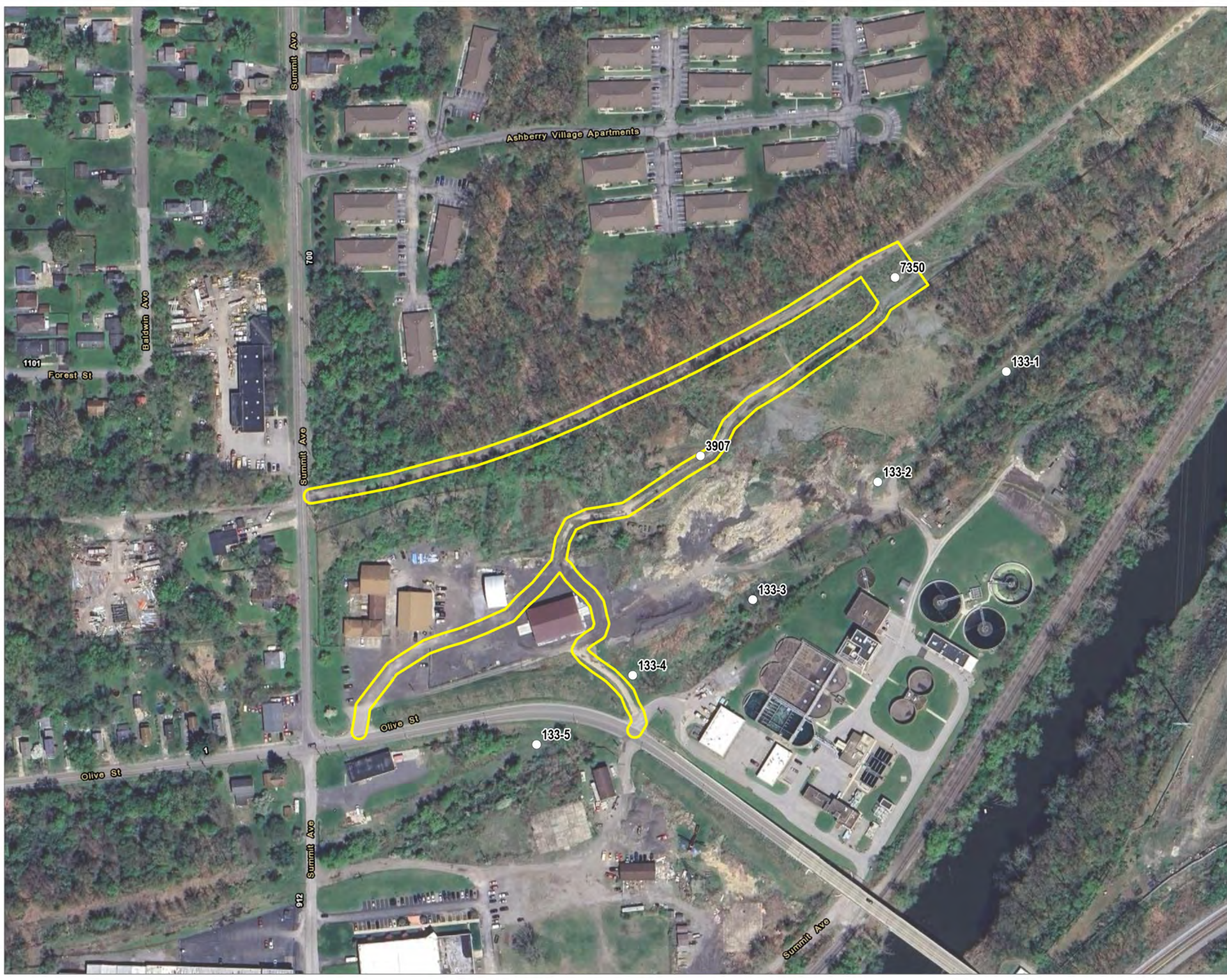
TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL	PROJ NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	

	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  
 - SAVED BY: MOPEL ON 10/9/2024, 11:29:46 AM. FILE PATH: T:\PROJECTS\FIRST\_ENERGY\429847\_0022\_0048\_NILES\CENTRAL\A9030\2-APPX\HIBERNACULAASSESSMENT.APRX LAYOUT NAME: FIG01\_SLM

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 Saved By: MOPEL on 10/8/2024, 11:22:46 AM; File Path: T:\L-PROJECTS\First\_Energy\429847\_0022\_0048\_NilesCentral\A9030\A-9030\HibemaculaAssessment.aprx; Layout Name: Fig02\_Aerial



- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.

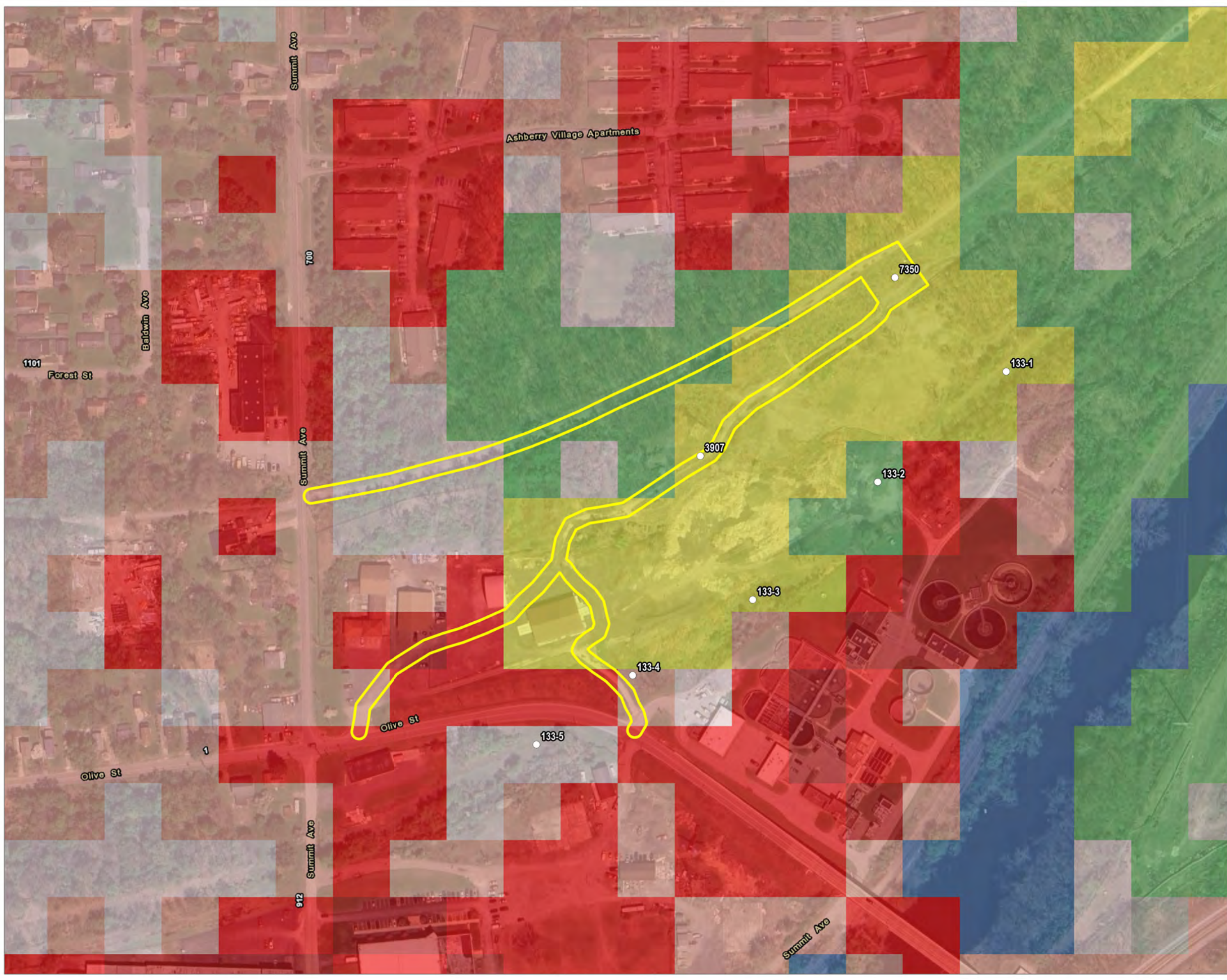


1:2,400  
 1" = 200'



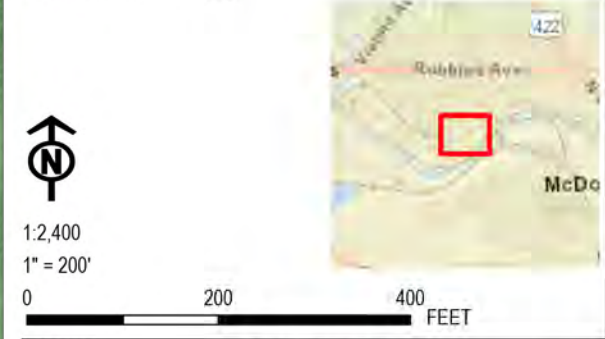
PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	HibemaculaAssessment.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 Saved By: MOPEL on 10/8/2024, 11:22:46 AM; File Path: T:\L-PROJECTS\First\_Energy\429847\_0022\_0048\_NilesCentralA9030\2-A\PROX\HibermaculaAssessment.aprx; Layout Name: Fig03\_NLCD



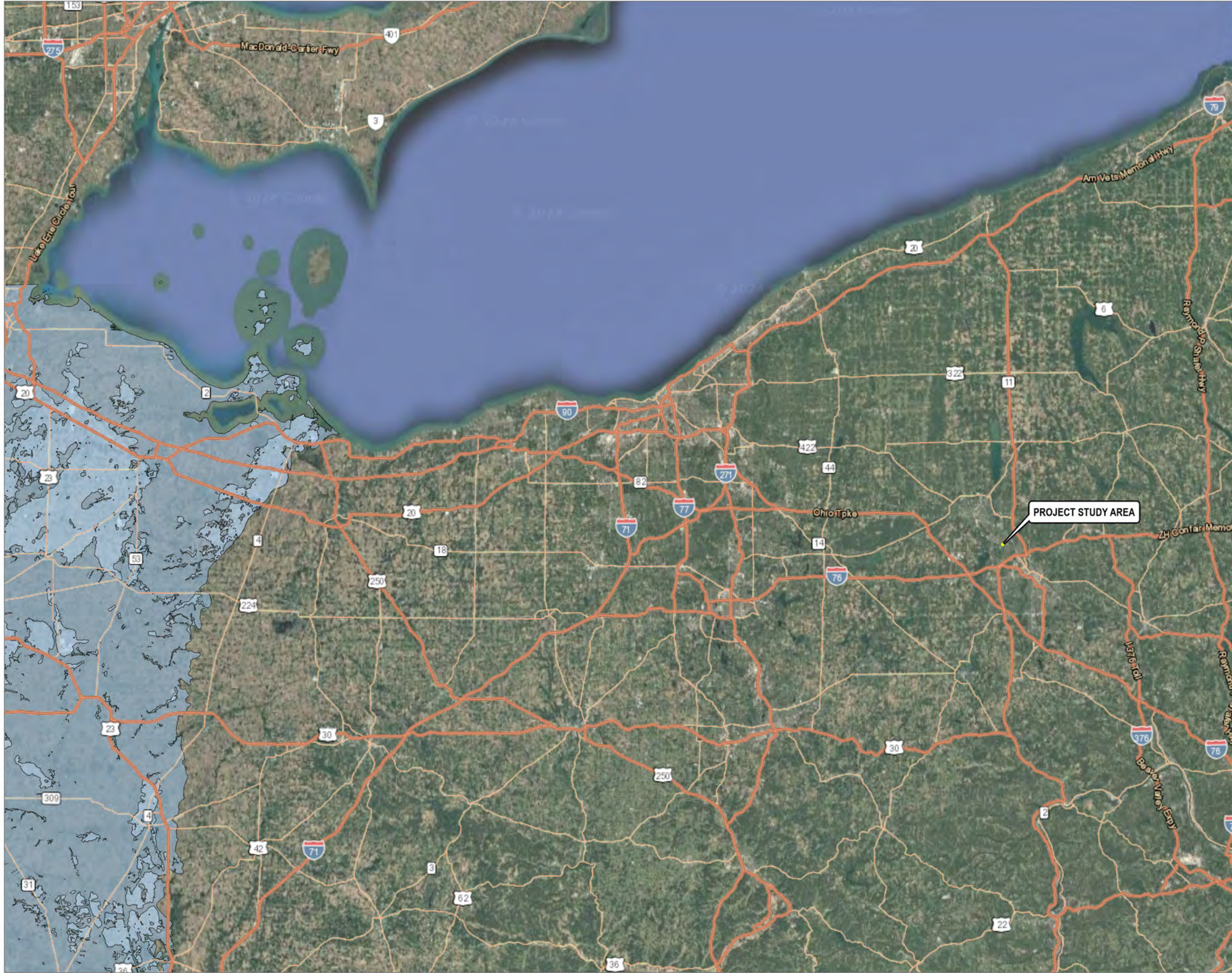
- PROJECT STUDY AREA
- EXISTING STRUCTURE
- NLCD LAND COVER CLASSIFICATION
- BARREN LAND
- DECIDUOUS FOREST
- DEVELOPED, HIGH INTENSITY
- DEVELOPED, LOW INTENSITY
- DEVELOPED, MEDIUM INTENSITY
- DEVELOPED, OPEN SPACE
- HAY/PASTURE
- OPEN WATER

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



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>NATIONAL LAND COVER DATABASE MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 3</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
<span style="float: right; font-size: small;">1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072</span>	
FILE:	HibermaculaAssessment.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 - Saved By: MOPEL on 10/8/2024, 11:22:46 AM. File Path: T:\L-PROJECTS\First\_Energy\429847\_0022\_0048\_NilesCentral\A9030\A-9030-Hibemaculassessmnet.aprx; Layout Name: Fig04A\_Karst

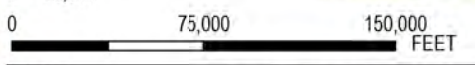


- PROJECT STUDY AREA
- KARST GEOLOGY**
- SILURIAN- AND DEVONIAN-AGE CARBONATE BEDROCK OVERLAIN BY LESS THAN 20 FEET OF GLACIAL DRIFT AND/OR ALLUVIUM
- SILURIAN- AND DEVONIAN-AGE CARBONATE BEDROCK OVERLAIN BY MORE THAN 20 FEET OF GLACIAL DRIFT AND/OR ALLUVIUM

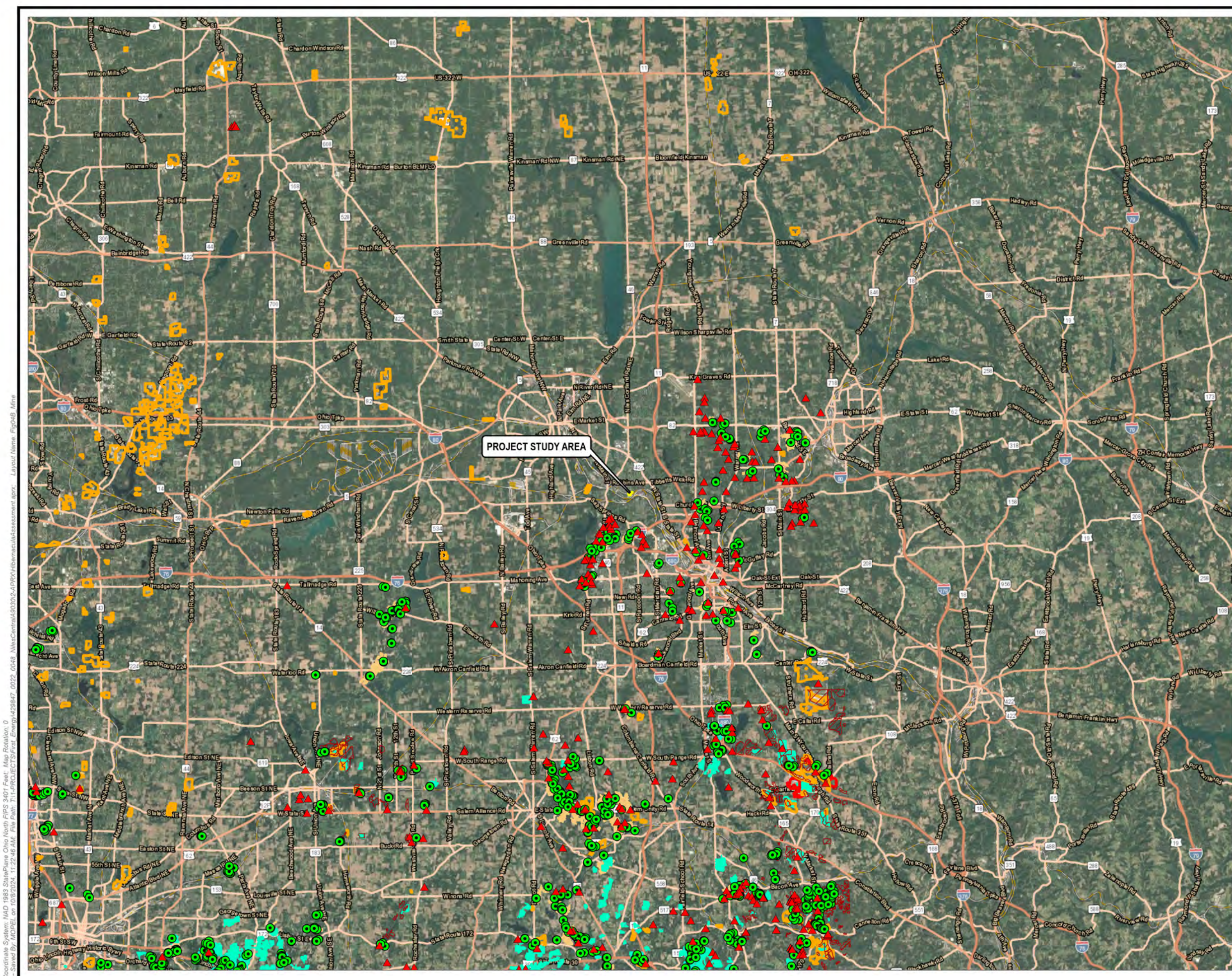
BASE MAP: GOOGLE MAPS.  
 DATA SOURCES: KARST DATA ACQUIRED FROM THE OHIO DEPARTMENT OF NATURAL RESOURCES-DIVISION OF GEOLOGICAL SURVEY, MAY 2024.



1:900,000  
 1" = 75,000'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>KARST MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 4A</b>
APPROVED BY: B. FALKINBURG	
DATE: OCTOBER 2024	
<span style="font-size: small; vertical-align: middle;">1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072</span>	
FILE: HibemaculaAssessment.aprx	



- PROJECT STUDY AREA
- ABANDONED MINE OPENING
- ABANDONED MINE - MINE POINT EXTENT UNKNOWN
- SURFACE COAL MINE
- HISTORIC SURFACE MINE
- ABANDONED UNDERGROUND COAL MINE
- SURFACE INDUSTRIAL MINE
- UNDERGROUND INDUSTRIAL MINE

PROJECT STUDY AREA

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



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

<b>PROJECT:</b>		<b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
<b>TITLE:</b>			
<b>MINE MAP</b>			
DRAWN BY:	M. OPEL	PROJ. NO.:	429847.0022.0048
CHECKED BY:	M. MOLNAR	<b>FIGURE 4B</b>	
APPROVED BY:	B. FALKINBURG		
DATE:	OCTOBER 2024		
		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  
 Saved By: MOPEL on 10/28/2024 11:22:46 AM. File Path: T:\PROJECTS\Final\_Energy\429847\_0022\_0048\_NilesCentral\A9030\A-9030\Final\HibemaculaAssessment.aprx; Layout Name: Fig04B\_Mine

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

<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 1.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing north.



**Photo No. 2.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 3.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing south.



**Photo No. 4.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing west.





<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 5.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo of the existing, gravel access drive within the Project Study Area, facing west.



**Photo No. 6.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo of flooded portion of existing, gravel access drive and location of U-EKG-2 within the Project Study Area, facing west.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 7.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing north.



**Photo No. 8.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 9.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing south.



**Photo No. 10.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing west.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 11.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing north.



**Photo No. 12.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 13.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing south.



**Photo No. 14.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing west.



## 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



September 18, 2024

Project Code: 2024-0138229

Dear Jenna Slabe:

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

Federally Threatened and Endangered Species: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact us for additional project review.

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

Sincerely,



Erin Knoll  
Field Office Supervisor



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

T 216.344.3072  
TRCcompanies.com

September 9, 2024

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: 2024-0138229) regarding the Niles-Niles Central 138kV A-296 Project located in the City of Niles, Trumbull County, Ohio.  
(TRC Project No. 429847.0022.0047)**

Dear Ms. Ashfield,

On behalf of the FirstEnergy Corporation, TRC Environmental Corporation (TRC) is requesting Technical Assistance regarding the proposed Niles-Niles Central 138kV A-296 Project (Project) located in the City of Niles, Trumbull 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: 41.179666, -80.731833

**County:** Trumbull County

**Project Description:** The proposed Project involves the replacement of switch A-296 on the existing Niles-Niles Central 138kV transmission line. The proposed Project Study Area is 0.914 acres, located in the City of Niles, Trumbull County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (**Figure 2: Aerial Map**) consists of an existing utility right-of-way (ROW) within residential land use and a paved parking lot. Currently as proposed, 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 utility ROW within residential land use and a paved parking lot.

Wetlands: The proposed Project Study Area does not include any National Wetlands Inventory features. A surface water delineation will be performed to determine the presence/absence of wetlands. Avoidance and minimization will be utilized during construction. If wetlands cannot be avoided, timber matting will be utilized during construction for avoidance.

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

Forested Area: The proposed Project Study Area contains minor forested habitat along the eastern edge of the existing utility ROW and residential land use. Currently as proposed, no tree clearing is anticipated within the Project Study Area.

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

Floodplains: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel (39155C0411D (eff. 6/18/2010), 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 proposed 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) 998-0481 or via email at [JSlabe@TRCCompanies.com](mailto:JSlabe@TRCCompanies.com) if you have any questions or require additional information.

Regards,



Jenna Slabe  
Ecologist

Attachments:

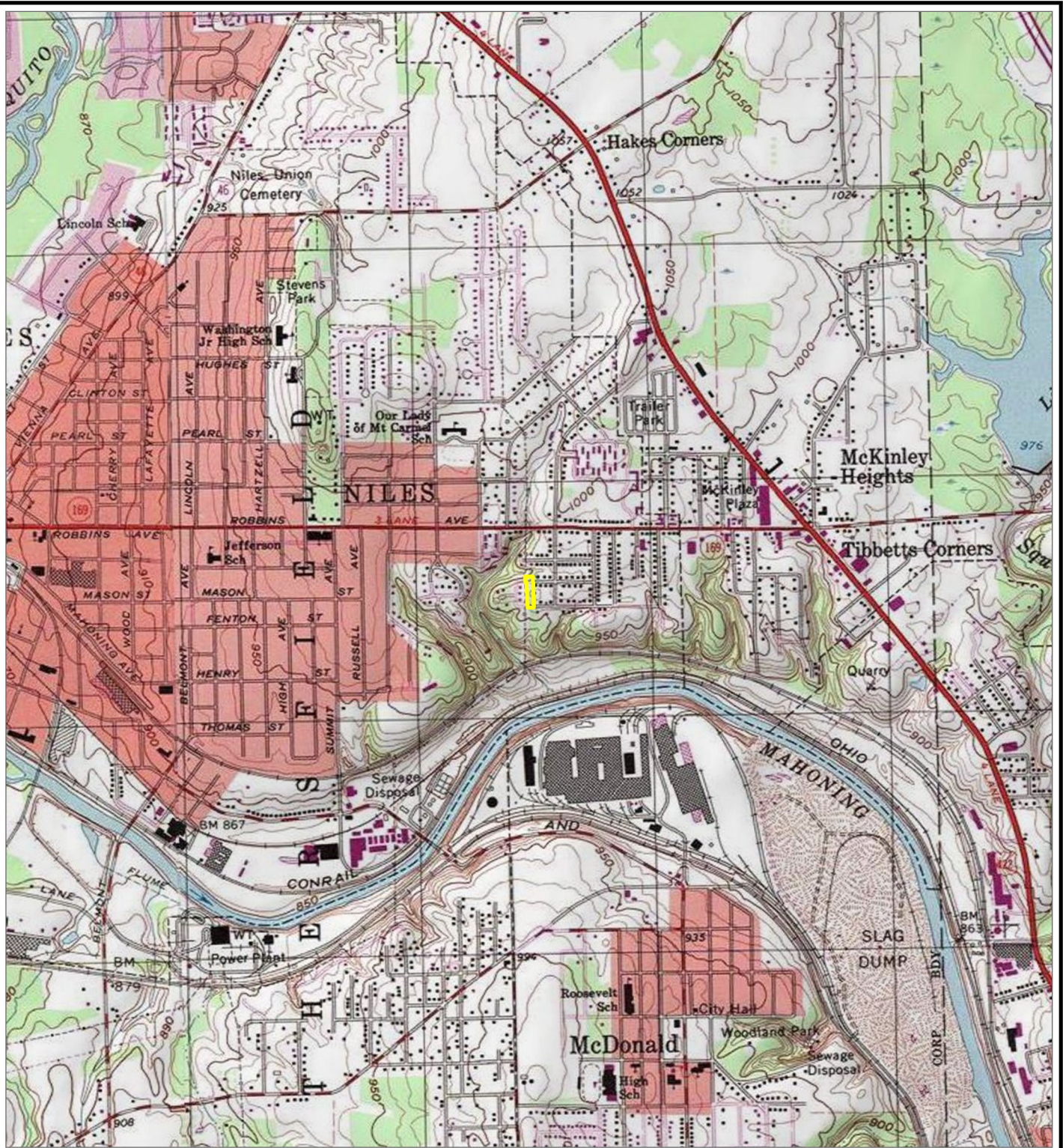
Figure 1: Site Location Map

Figure 2: Aerial Map

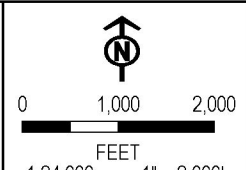
USFWS IPaC Official Species List



COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH RIPS 3401 FEET; MAP ROTATION: 0  
 -- SAVED BY: MOPEL ON 6/24/2024, 09:27:45 AM; FILE PATH: T:\1-PROJECTS\FIRST\_ENERGY\429847\_0022\_0047\_NILES\CENTRAL\A296\2-APPROX\WDR APPR; LAYOUT NAME: FIG01\_SLM



 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, GIRARD QUAD

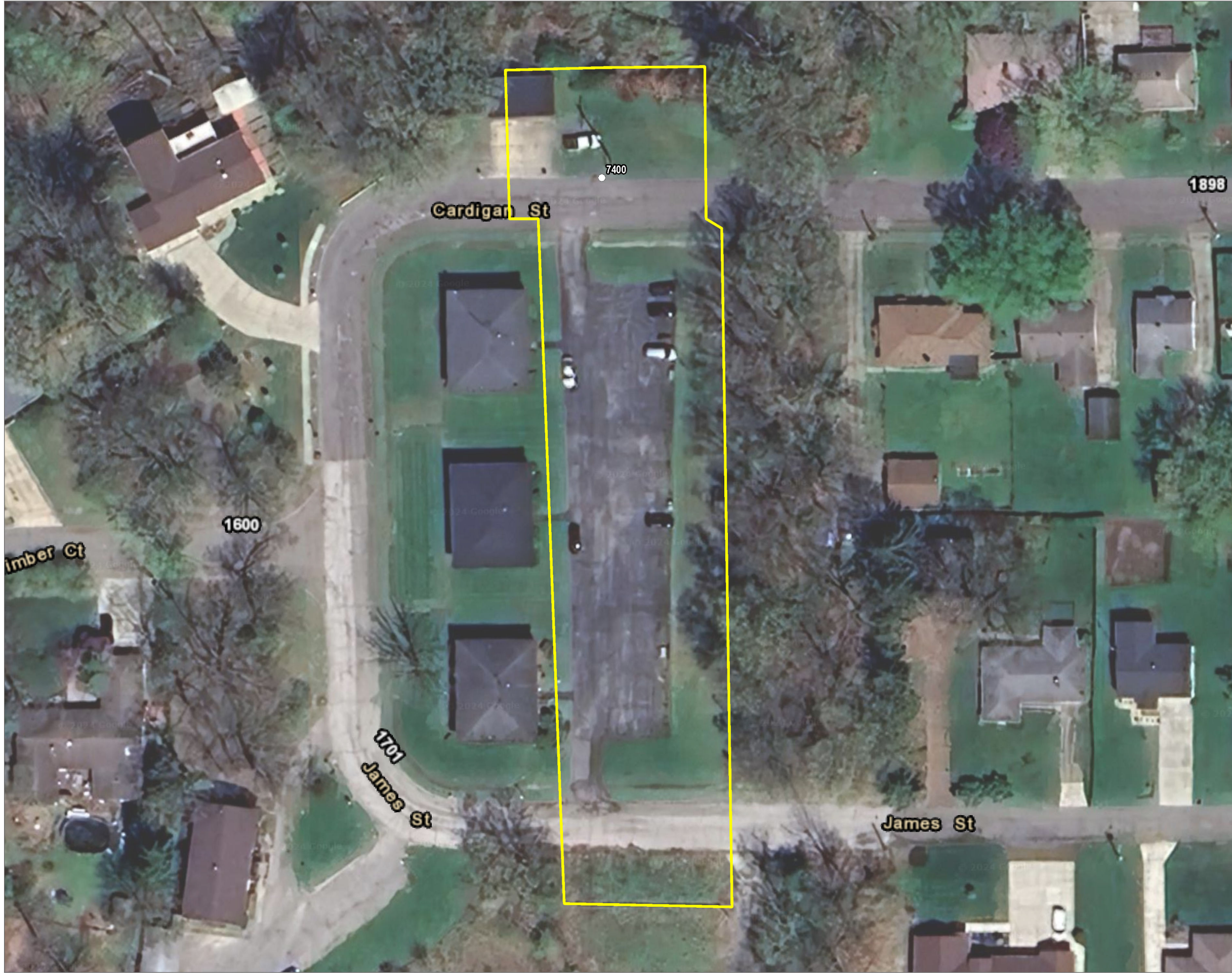
PROJECT: **FIRSTENERGY  
 NILES-NILES CENTRAL 138KV A-296 PROJECT  
 TRUMBULL COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: JUNE 2024	

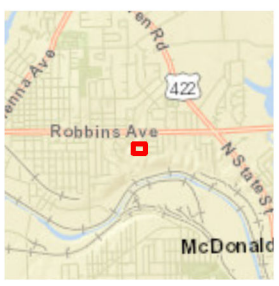
 1382 WEST NINTH STREET  
 SUITE 400  
 CLEVELAND, OH 44113  
 PHONE: 216-344-3072

FILE: WDR

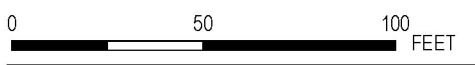


- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



1:600  
1" = 50'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0047
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: JUNE 2024	
<span style="font-size: small; vertical-align: middle;">1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072</span>	
FILE:	WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
-- Saved By: MOPEL on 6/24/2024, 09:27:45 AM; File Path: T:\1-PROJECTS\Final\_Energy\429847\_0022\_0047\_NilesCentralA29612-APRX\WDR.aprx; Layout Name: Fig02\_Aerial



## 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:

08/31/2024 00:37:14 UTC

Project Code: 2024-0138229

Project Name: Niles-Niles Central 138kV A-296 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 IPaC 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 [Migratory Bird Permit | What We Do | U.S. Fish & Wildlife Service \(fws.gov\)](#).

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

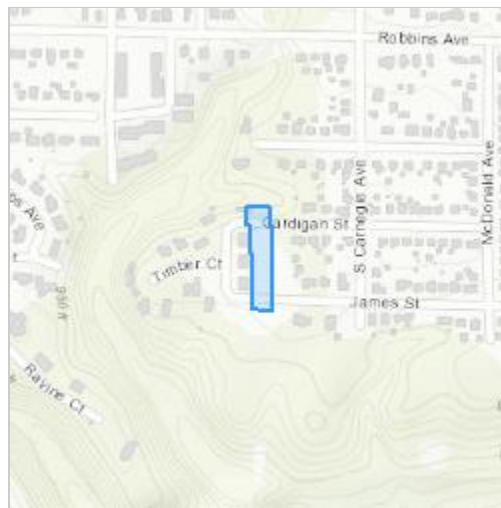
(614) 416-8993

## PROJECT SUMMARY

Project Code: 2024-0138229  
Project Name: Niles-Niles Central 138kV A-296 Project  
Project Type: Transmission Line - Maintenance/Modification - Above Ground  
Project Description: The proposed Project involves the replacement of switch A-296 on the existing Niles-Niles Central 138kV transmission line. The proposed Project Study Area is 0.914 acres, located in the City of Niles, Trumbull County, Ohio.

### Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@41.17957715,-80.73181111440753,14z>



Counties: Trumbull County, Ohio

## ENDANGERED SPECIES ACT SPECIES

There is a total of 2 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

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## 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: Jenna Slabe  
Address: 1382 West 9th Street Suite 400  
City: Cleveland  
State: OH  
Zip: 44113  
Email: jslabe@trccompanies.com  
Phone: 3309980481

## 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



September 18, 2024

Project Code: 2024-0138486

Dear Jenna Slabe:

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

Federally Threatened and Endangered Species: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact us for additional project review.

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

Sincerely,



Erin Knoll  
Field Office Supervisor



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

T 216.344.3072  
TRCcompanies.com

September 9, 2024

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: 2024-0138486) regarding the Niles-Niles Central 138kV A-9030 Project located in the City of Niles, Trumbull County, Ohio.  
(TRC Project No. 429847.0022.0048)**

Dear Ms. Ashfield,

On behalf of the FirstEnergy Corporation, TRC Environmental Corporation (TRC) is requesting Technical Assistance regarding the proposed Niles-Niles Central 138kV A-9030 Project (Project) located in the City of Niles, Trumbull 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: 41.172942, -80.738931

**County:** Trumbull County

**Project Description:** The proposed Project involves the replacement of switch A-9030 on the existing Niles-Niles Central 138kV transmission line. The proposed Project Study Area is 2.453 acres, located in the City of Niles, Trumbull County, Ohio. As depicted in the attached mapping, the proposed Project Study Area (**Figure 2: Aerial Map**) consists of an existing utility right-of-way (ROW) and gravel access roads within industrial land use and forested habitat. Currently as proposed, 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 utility ROW and gravel access roads within industrial land use and forested habitat.

Wetlands: The proposed Project Study Area does not include any National Wetlands Inventory features. A surface water delineation will be performed to determine the presence/absence of wetlands. Avoidance and minimization will be utilized during construction. If wetlands cannot be avoided, timber matting will be utilized during construction for avoidance.

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

Forested Area: The proposed Project Study Area contains forested habitat along the edges of the existing utility ROW and industrial-use gravel access roads. Currently as proposed, no tree clearing is anticipated within the Project Study Area.

Uplands: The proposed Project Study Area includes upland habitat within the existing utility ROW and gravel access roads within industrial land use and forested habitat.

Floodplains: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel (39155C0411D (eff. 6/18/2010)), a small portion of the southeastern end of the proposed Project is located within a FEMA-mapped 100-Year Flood Zone. No groundwork is proposed within the 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 proposed 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) 998-0481 or via email at [JSlabe@TRCCompanies.com](mailto:JSlabe@TRCCompanies.com) if you have any questions or require additional information.

Regards,



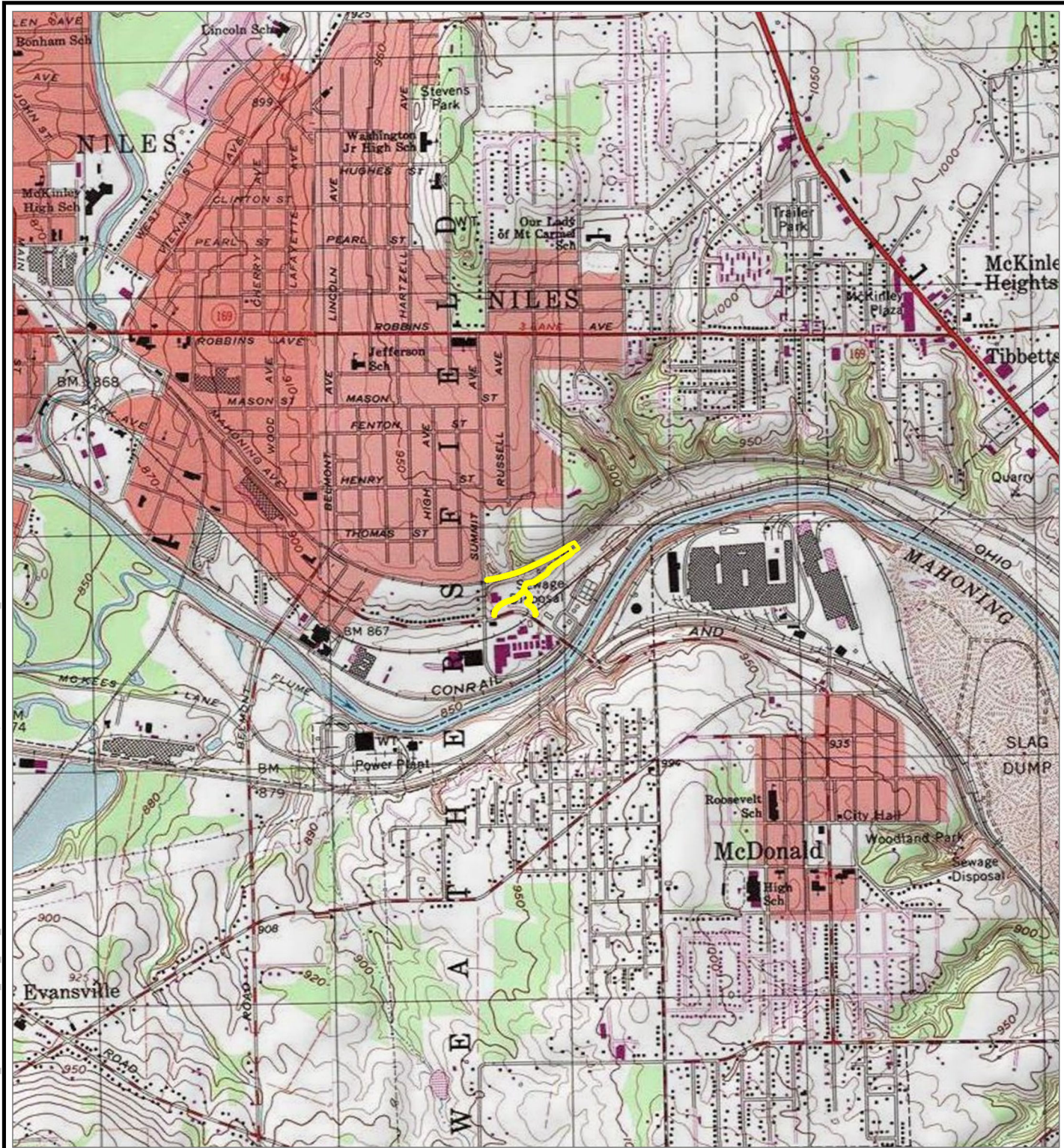
Jenna Slabe  
Ecologist

Attachments:

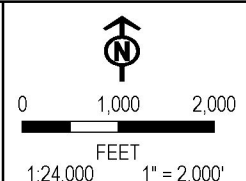
Figure 1: Site Location Map

Figure 2: Aerial Map

USFWS IPaC Official Species List



 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE, GIRARD QUAD

PROJECT: **FIRSTENERGY**  
**NILES-NILES CENTRAL 138KV A-9030 PROJECT**  
**TRUMBULL COUNTY, OH**

TITLE: **SITE LOCATION MAP**

DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 1</b>
APPROVED BY: B. FALKINBURG	
DATE: AUGUST 2024	



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

FILE: WDR

COORDINATE SYSTEM: NAD 1983 STATEPLANE OHIO NORTH RIPS 3401 FEET, MAP ROTATION: 0  
 -- SAVED BY: MOPEL ON 8/27/2024, 13:32:28 PM. FILE PATH: T:\1-PROJECTS\FIRST\_ENERGY\429847\_0022\_0048\_NILES\CENTRAL\A9030\2-APR\XWD\R\_APPX. LAYOUT NAME: FIG01\_SLM



- PROJECT STUDY AREA
- EXISTING STRUCTURE

BASE MAP: GOOGLE MAPS.



1:1,800  
1" = 150'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>AERIAL MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 2</b>
APPROVED BY: B. FALKINBURG	
DATE: AUGUST 2024	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 - Saved By: MOPEL on 8/27/2024, 13:32:28 PM. File Path: T:\1-PROJECTS\FIRST\_Energy\429847\_0022\_0048\_NilesCentral\A9030\138KV\WDR.aprx. Layout Name: Fig02\_Aerial



## 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:

09/03/2024 14:36:50 UTC

Project Code: 2024-0138486

Project Name: Niles-Niles Central 138kV A-9030 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 IPaC 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 [Migratory Bird Permit | What We Do | U.S. Fish & Wildlife Service \(fws.gov\)](#).

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: 2024-0138486  
Project Name: Niles-Niles Central 138kV A-9030 Project  
Project Type: Transmission Line - Maintenance/Modification - Above Ground  
Project Description: The proposed Project involves the replacement of switch A-9030 on the existing Niles-Niles Central 138kV transmission line. The proposed Project Study Area is 2.453 acres, located in the City of Niles, Trumbull County, Ohio.

### Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@41.17293185,-80.74138985987545,14z>



Counties: Trumbull County, Ohio

## ENDANGERED SPECIES ACT SPECIES

There is a total of 2 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>	Endangered
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>	

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i>	Candidate
No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	

## 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: Jenna Slabe  
Address: 1382 West 9th Street Suite 400  
City: Cleveland  
State: OH  
Zip: 44113  
Email: jslabe@trccompanies.com  
Phone: 3309980481

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
- Saved By: MOPEL on 6/24/2024, 09:25:01 AM; File Path: T:\1-PROJECTS\First\_Energy\429847\_0022\_0047\_NilesCentral\29612-APRX\WDR.aprx; Layout Name: Fig03\_Delineation



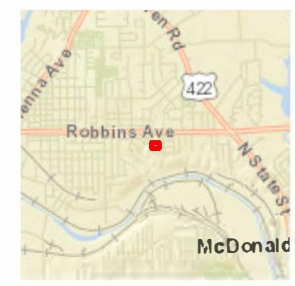
- PROJECT STUDY AREA
- EXISTING STRUCTURE
- UPLAND DATA POINT

# EXHIBIT 9

BASE MAP: GOOGLE MAPS  
DATA SOURCES: TRC WETLAND DELINEATION COMPLETED JUNE 20, 2024.



1:360  
1" = 30'



PROJECT:		<b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-296 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE:		<b>DELINEATED RESOURCES MAP</b>	
DRAWN BY:	M. OPEL	PROJ. NO.:	429847.0022.0047
CHECKED BY:	M. MOLNAR	<b>FIGURE 3</b>	
APPROVED BY:	B. FALKINBURG		
DATE:	JUNE 2024		
		1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:		WDR.aprx	

<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0047
------------------------------------	---	---

**Photo No. 1.**

**Photo Date:**  
 6/20/2024

**Description:**

Representative photo from the southeast extent of Project Study Area, facing north.



**Photo No. 2.**

**Photo Date:**  
 6/20/2024

**Description:**

Representative photo from the southwest extent of Project Study Area, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0047
------------------------------------	---	---

**Photo No. 3.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the northwest extent of Project Study Area, facing south.



**Photo No. 4.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the northeast extent of the Project Study Area, facing south.





<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0047
------------------------------------	---	---

**Photo No. 5.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the southwest extent of the Project Study Area, facing north.



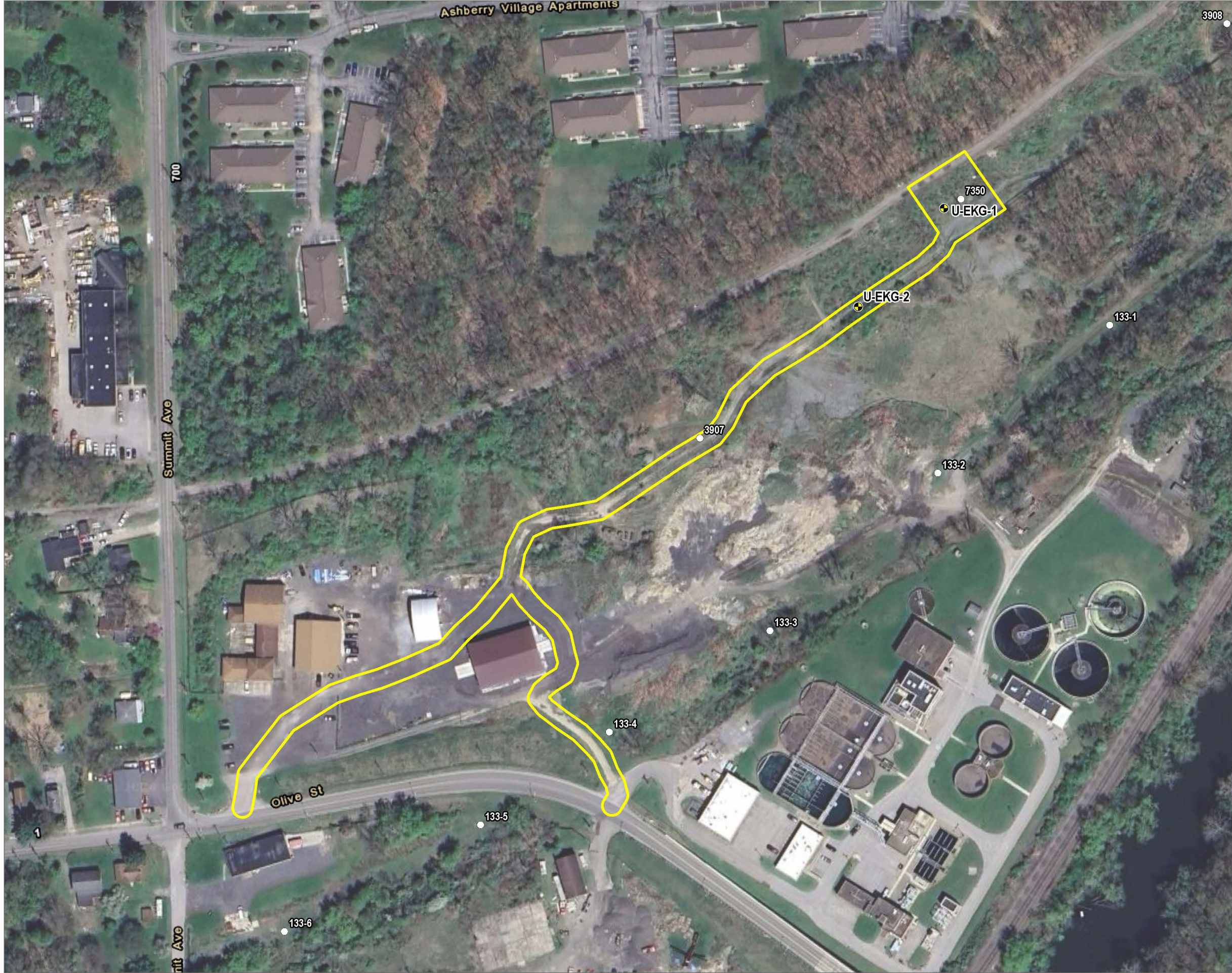
**Photo No. 6.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo from the southwestern extent of the Project Study Area, facing west.



Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0  
 - Saved By: MOPEL on 6/24/2024, 09:45:52 AM; File Path: T:\PROJECTS\Trumbull\_Energy\429847\_0022\_0048\_NilesCentralA9030A-APR\WDR.aprx; Layout Name: Fig03\_Delineation



- PROJECT STUDY AREA
- EXISTING STRUCTURE
- UPLAND DATA POINT

# EXHIBIT 9A

BASE MAP: GOOGLE MAPS  
 DATA SOURCES: TRC WETLAND DELINEATION COMPLETED JUNE 20, 2024.



1:1,800  
 1" = 150'



PROJECT: <b>FIRSTENERGY NILES-NILES CENTRAL 138KV A-9030 PROJECT TRUMBULL COUNTY, OH</b>	
TITLE: <b>DELINEATED RESOURCES MAP</b>	
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0048
CHECKED BY: M. MOLNAR	<b>FIGURE 3</b>
APPROVED BY: B. FALKINBURG	
DATE: JUNE 2024	
1382 WEST NINTH STREET SUITE 400 CLEVELAND, OH 44113 PHONE: 216-344-3072	
FILE:	WDR.aprx

<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 1.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing north.



**Photo No. 2.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 3.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing south.



**Photo No. 4.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southwest access point to the Project Study Area near Olive Street, facing west.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 5.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo of the existing, gravel access drive within the Project Study Area, facing west.



**Photo No. 6.**

**Photo Date:**  
6/20/2024

**Description:**  
Representative photo of flooded portion of existing, gravel access drive and location of U-EKG-2 within the Project Study Area, facing west.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 7.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing north.



**Photo No. 8.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing east.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 9.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing south.



**Photo No. 10.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the site conditions at Structure 7350 within the Project Study Area, facing west.



<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 11.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing north.



**Photo No. 12.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing east.





<b>Client Name:</b> FirstEnergy	<b>Site Location:</b> City of Niles, Trumbull County, Ohio	<b>Project No.:</b> 429847.0022.0048
------------------------------------	---	---

**Photo No. 13.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing south.



**Photo No. 14.**

**Photo Date:**  
6/20/2024

**Description:**

Photo of the southeast access point to the Project Study Area near Olive Street, facing west.

