

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

CONSTRUCTION NOTICE

**BROOKSIDE-HENRIETTA 138 KV TRANSMISSION LINE
SWITCH REPLACEMENT PROJECT
OPSB CASE NO.: 24-2381-EL-BNR**

June 10, 2024

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

CONSTRUCTION NOTICE
BROOKSIDE-HENRIETTA 138 kV TRANSMISSION LINE
SWITCH REPLACEMENT PROJECT

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

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05: Name and Reference Number

Name: Brookside-Henrietta 138 kV Transmission Line Switch Replacement Project (“Project”).

Reference Number: 2085

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

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, is proposing to replace the existing two-way switch tap structure, (structure #12685 and switch A-97), on the existing Brookside-Henrietta 138 kV Transmission Line with a new, single-circuit wood monopole 3-way tap structure. ATSI will also add two (2) new switches mounted on a steel pole on concrete foundation structure Nos. 848B and 848A, one to the north (new Switch A-97) and one to the south (new Switch A-88) of the tap. The Project is located in Troy Township, Ashland County, Ohio.

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

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

The Project meets the requirements for a Construction Notice application because the Project is within the types of projects defined by Item (2)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of OAC Rule 4906-1-01. This item states:

(2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing transmission line, or replacing structures with a different type of structure, for a distance of:

(a) two miles or less

The proposed Project is within the requirements of Item (2)(a) as it involves replacing one (1) structure with a different type of structure and adding two (2) new switch structures on an existing transmission line within existing right-of-way.

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

The Project is needed to replace an inoperable switch and update another switch on the existing Brookside-Henrietta 138 kV Transmission Line. Currently, existing KPF switches A-97 and A-88 are located on existing transmission line structure #12685. Switch A-97 is inoperable due to degradation of mechanical components, including the jaw blade assembly, operating rod, and standoffs. Maintenance and repairs on these KPF switches are impractical and expensive because replacement parts are unavailable. Additionally, this type of in-line switch no longer meets FirstEnergy's engineering standards for design or safety and has been identified as priority for replacement. Although Switch A-88 (from the same manufacturer as A-97) has not yet been deemed inoperable, it likewise does not meet FirstEnergy's engineering standard for design or safety. Because it shares structure #12685 with Switch A-97, replacing both switches as part of this Project is the most cost effective and least impactful solution. Deferring replacement of Switch A-88 would result in a subsequent project needed within 24 months.

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. This map shows ATSI's 345 kV and 138 kV transmission lines and transmission substations, including the Brookside-Henrietta 138 kV Transmission Line. 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. The general layout is shown in Exhibit 3.

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

- No action – One alternative to the proposed solution is for ATSI to continue to leave the existing equipment in its inoperable state. This is not the preferred course of action, as it could potentially prevent necessary switching on the transmission system and limit ATSI's ability to provide reliable transmission service to existing and future customers served from the Lorain Medina Rural Electric Cooperative, Inc. ("LMRC") owned Troy Substation.
- Replacing only the inoperable switch, A-97, and leaving A-88 for future work, was also considered and rejected because it would create an unbalanced weight load at Structure #12685. It would also require future mobilization, access, and expenses that could otherwise be avoided by replacing A-88 along with A-97.

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

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

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

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

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

The construction schedule for this Project is expected to begin as early as September 16, 2024, and to be completed by November 1, 2024.

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

Exhibit 1 and 2 depict the general location of the Project. Exhibit 1 provides a partial copy of the United States Geologic Survey, Ashland 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

The Project is located entirely within property (Parcel No. N39-007-0-0008-03) owned by LMRC within an existing easement. No new easements will be required for the 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:	336.4 kcmil 30/7 ACSR
Static Wire:	7#8 Alumoweld
Insulators:	Porcelain
ROW Width:	100'
Structure Types:	Exhibit 4: 3-Way Wood Pole Tap Structure, one (1) structure needed. Exhibit 5: Steel Pole Switch Structure on Concrete Foundation, two (2) structures needed.

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

There are no occupied residences or institutions within 100 feet from the proposed transmission line centerline. Therefore, no Electric and Magnetic Field (“EMF”) calculations are required by this subsection.

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

The estimated cost for the proposed Project is \$920,000. 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 located in Troy Township, Ashland County, Ohio. The main land use around the Project area is commercial (utility parking) and agricultural. No significant changes or impacts to the current or future land use are anticipated.

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

Agricultural land (primarily cultivated cropland) exists within the Project’s Area of Potential Effect (“APE”), though none of the parcels are designated as Agricultural Districts. Agricultural land surrounds the parcel, but there are no crops on the parcel where construction will take place. All of the work is limited to the substation parcel (zoned commercial).

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

As part of the investigation, a search of Ohio Historic Preservation Office (“OHPO”) online database was conducted on May 3, 2024, to identify the existence of any significant archeological or cultural resource sites within 1.0 mile of the Project’s Area of Potential Effect (“APE”). A map of the results of the search is shown in Exhibit 6.

The OHPO 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 no listed NRHP sites and no NRHP eligible sites were identified within 1.0 mile of the Project’s APE.

The OHPO database also includes listings from the Ohio Historic Inventory (“OHI”), the Ohio Archaeological Inventory (“OAI”), previous cultural resource surveys, and the Ohio Genealogical Society (“OGS”) cemetery inventory. The database review revealed no historic properties, no OHI resources, no OGS Cemeteries, and no OAI archaeological sites within 1.0 miles of the Project’s APE. One previous cultural resource survey was identified and encompasses the entire Project APE. No impacts to any culturally significant resources are expected.

The OHPO response dated May 30, 2024, attached as part of Exhibit 6, determined that 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 scope includes the installation of two (2) switch structures. All work will be placed in an area within the existing logistical footprint of the Troy Substation on property owned by Lorain Medina Rural Electric Cooperative. 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

TRC submitted a request to the Ohio Department of Natural Resources (“ODNR”) to conduct an Environmental Review of the Project area on July 18, 2023. As part of the Environmental Review, the ODNR conducted a search of the ODNR-Division of Wildlife’s (DOW) Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project’s area. The ODNR’s response on August 14, 2023, stated that the Natural Heritage Database indicates there are no records

of state or federally listed plants or animals within 1 mile of the Project area. Furthermore, the ODNR’s Division of Wildlife (“DOW”) commented that the Project is within the range of two (2) federally endangered species, five (5) state endangered species, and two (2) state threatened species. An on-site field assessment was performed by TRC. Field observations did not identify any suitable habitat for these species within the Project area. Therefore, due to the fact that suitable habitat for these listed species is not present within the Project area, this Project will not affect these species. A copy of ODNR’s response is included as Exhibit 7. TRC also submitted a request to the U.S. Fish and Wildlife Service (“USFWS”) for an Ecological Review to research the presence of any endangered, threatened, rare, or designated species within one (1) mile of the Project Area. A copy of USFWS response dated August 8, 2023, is included as Exhibit 8. Based on information received from USFWS for the Project Study Area, there are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project area. Due to the Project’s type, size, and location, USFWS does not anticipate any adverse effects upon federally endangered, threatened, proposed, or candidate species.

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

Table 1. List of Endangered, Threatened, and Rare Species

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Preferred Habitat	Suitable Habitat Present within Study Area
Indiana Bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees & Forest	No
Northern Long-Eared Bat	<i>Myotis septentrionalis</i>	Endangered	Threatened	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
Iowa darter	<i>Etheostoma exile</i>	NA	Endangered	Perennial Streams	No

Lake Chubsucker	<i>Erimyzon sucetta</i>	NA	Threatened	Perennial Streams	No
Greater Redhorse	<i>Moxostoma valenciennesi</i>	NA	Threatened	Perennial Streams	No
Eastern Hellbender	<i>Cryptobranchus alleganiensis alleganiensis</i>	NA	Endangered	Perennial Streams	No
Northern Harrier	<i>Circus hudsonis</i>	NA	Endangered	Wet Grassland, Fields, & Prairies	No

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

The ODNR and USFWS comments did not identify any areas of ecological concern. TRC conducted a wetland and stream delineation of the Project area. The TRC investigation focused on an approximately 0.40-acre Project Study Area at the existing Troy Substation and associated areas encompassing the existing and proposed switch structure locations. No potentially jurisdictional aquatic resources were identified within the immediate vicinity of the Project area.

The concrete foundations, steel pole switch structures, and ground mats associated with the installation of the switch structures will be placed in an area within the existing logistical footprint of the Troy Substation on property owned by LMRC. Therefore, notification to the U.S. Army Corps of Engineers (USACE) is not required because 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 scope does not include any in-stream activities or encroach on any regulated flood plains based on a review of FEMA’s online 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 Troy Township and Ashland County, Ohio:

Ashland County

Commissioner Michael E. Welch,
President
Ashland County Commissioners
110 Cottage Street
Ashland, OH 44805

Mr. Edward J. Meixner, P.E., P.S.
Ashland County Engineer
1511 Cleveland Avenue
Ashland, OH 44805

Commissioner Denny D. Bittle,
Vice President
Ashland County Commissioners
110 Cottage Street
Ashland, OH 44805

Ms. Jane Houin, Director
Ashland County Planning
Department
110 Cottage Street
Ashland, OH 44805

Commissioner James Emmett Justice
Ashland County Commissioners
110 Cottage Street
Ashland, OH 44805

Troy Township

Mr. Rusty Callihan, Chairman
Troy Township Trustee
872 CR 40
Nova, OH 44859

Mr. Chase Galloway,
Troy Township Trustee,
978 TR 350
Nova, OH 44859

Mr. Tim Roth, Vice-Chairman
Troy Township Trustee
904 TR 350
Nova, OH 44859

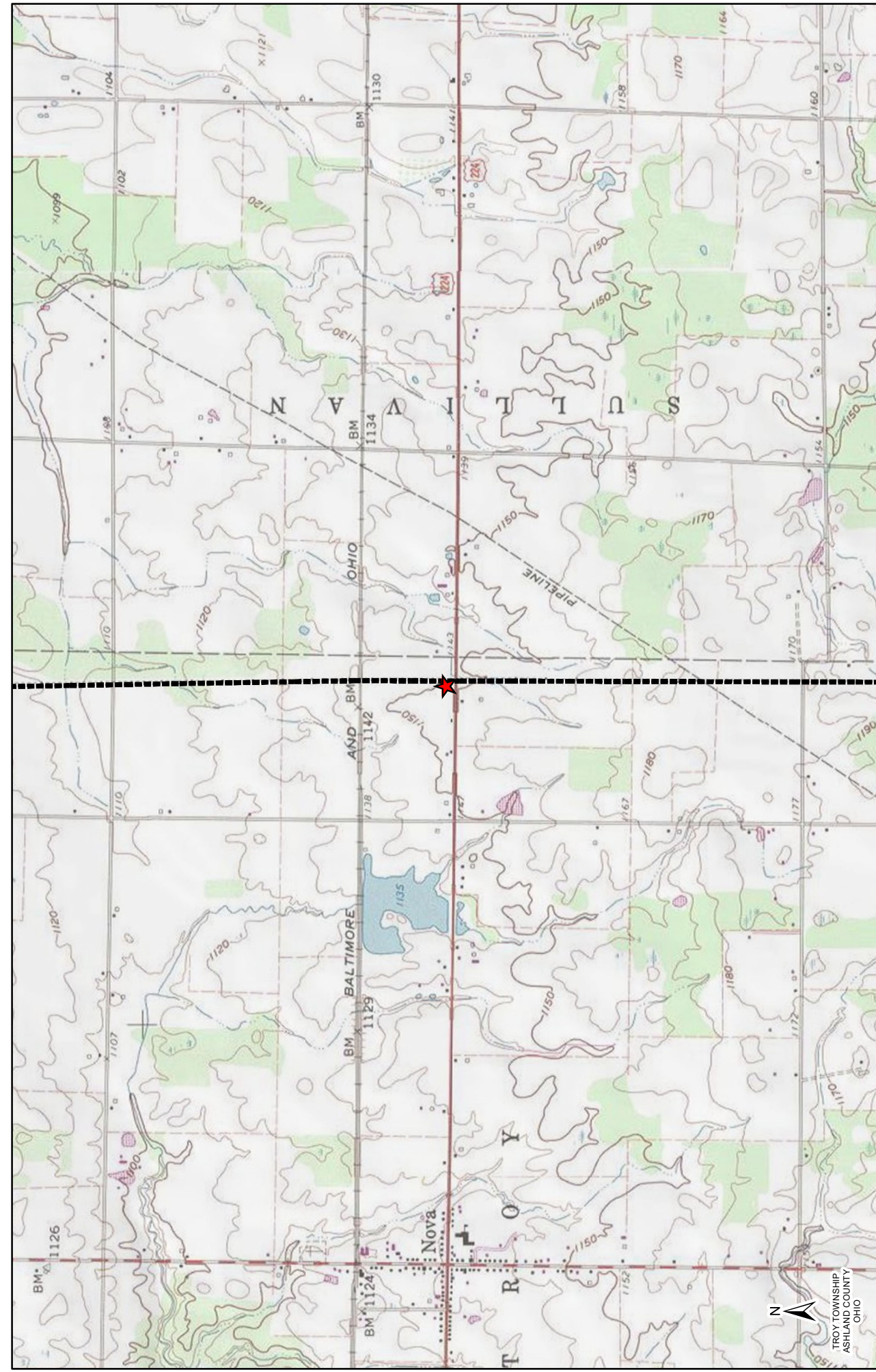
Mr. Fred Lowery, Fiscal Officer
Troy Township
973 US 224
Nova, OH 44859

Library

Ms. Anne M. Lowery, MLIS, Director
New London Public Library
67 S Main St,
New London, OH 44851

Per OAC Rule 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 OAC Rules 4906-6-07(A)(1) and 4906-6-07(A)(2).

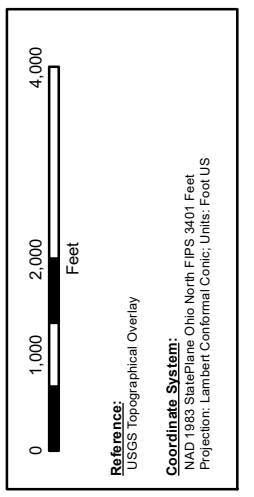
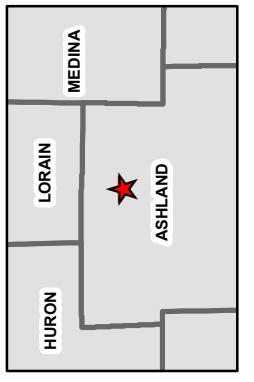
Information is posted at www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Construction Notice application. The link to this website is being provided in accordance with OAC Rule 4906-6-07(B), which requires ATSI to provide the OPSB with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



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EXHIBIT 1

**Brookside-Henrietta 138 kV
 Transmission Line Switch Replacement**



LEGEND:

★ Project Location

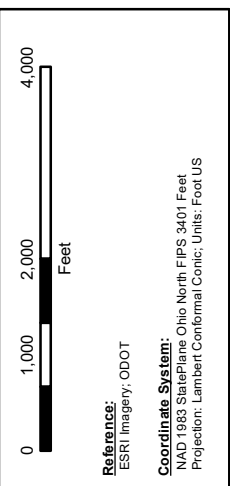
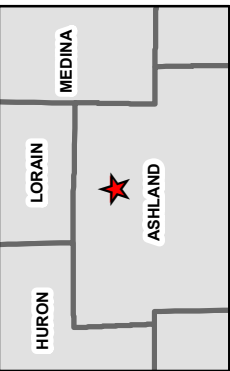
--- Brookside-Henrietta 138
 kV Transmission Line



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EXHIBIT 2

**Brookside-Henrietta 138 kV
 Transmission Line Switch Replacement**



LEGEND:

- ★ Project Location
- Brookside-Henrietta 138 kV Transmission Line
- Roads



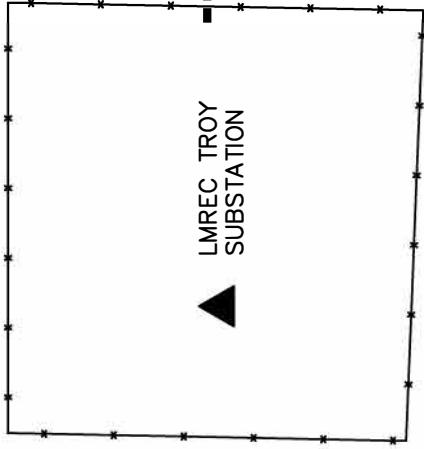
TROY TOWNSHIP
ASHLAND COUNTY
OHIO

*NOT TO SCALE

A-97

STR. 12685

A-88



LMREC TROY
SUBSTATION

US HIGHWAY 224

224

BROOKSIDE-HENRIETTA 138 kV

STR. 848

LEGEND

- EXISTING 138 kV CONDUCTOR
- PROPOSED 138 kV CONDUCTOR
- SUBSTATION FENCE LINE
- EXISTING STEEL LATTICE STRUCTURE
- NEW 3-WAY TAP WOOD POLE STRUCTURE
- NEW STEEL POLE SWITCH STRUCTURE
- EXISTING ROADS
- SUBSTATION

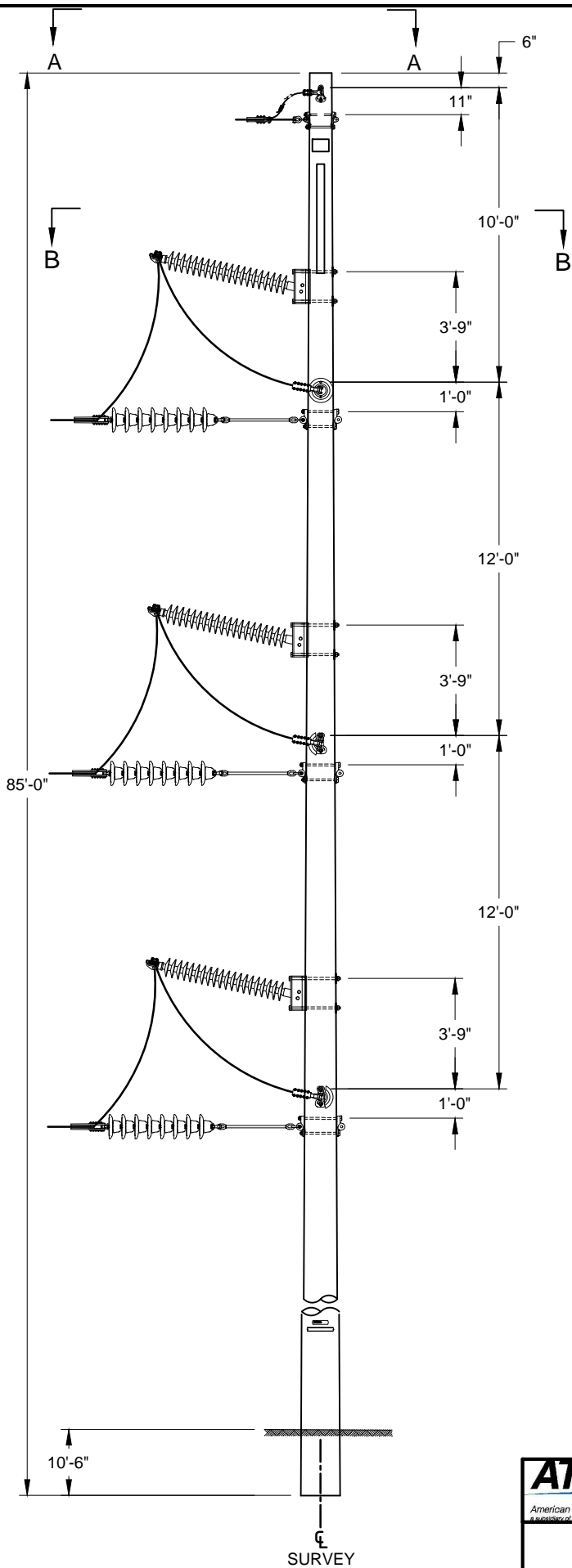


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BROOKSIDE-HENRIETTA 138 kV
TRANSMISSION LINE
SWITCH REPLACEMENT PROJECT

GENERAL LAYOUT

EXHIBIT 3



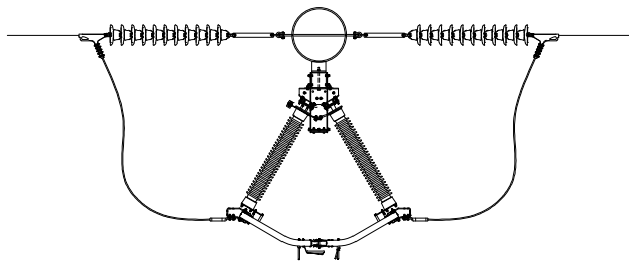
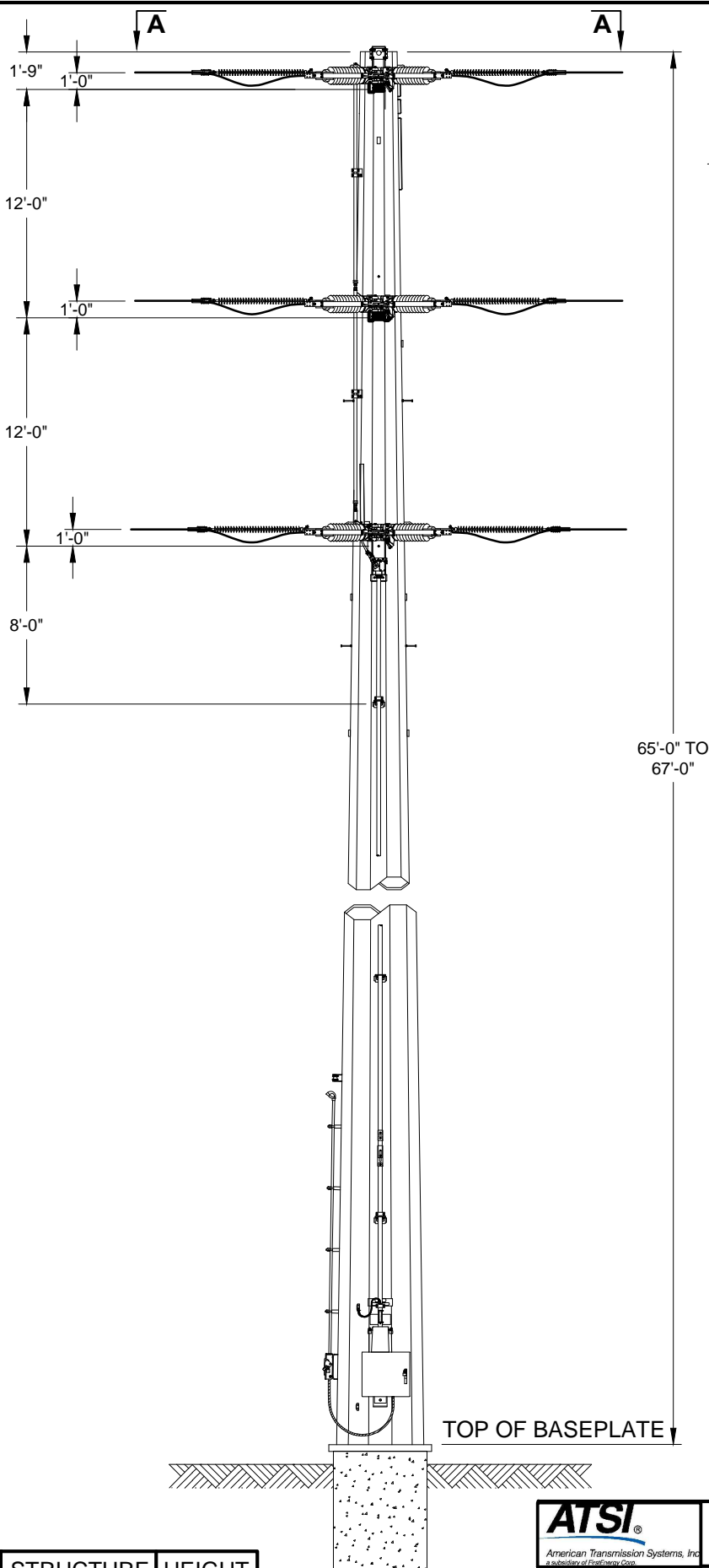
STRUCTURE	HEIGHT
A-97	85'-0"

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BROOKSIDE-HENRIETTA 138kV
 SWITCH A-88 & A-97 REPLACEMENT

138kV SINGLE CIRCUIT 3-WAY TAP WOOD STRUCTURE

EXHIBIT 4



SECTION A-A

STRUCTURE	HEIGHT
848A	67'-0"
848B	65'-0"



BROOKSIDE-HENRIETTA 138KV
SWITCH A-88 & A-97 REPLACEMENT

138KV SINGLE CIRCUIT STEEL POLE SWITCH STRUCTURE ON
CONCRETE FOUNDATION

EXHIBIT 5

SCALE: NTS



EXHIBIT 6

In reply refer to:
2024-ASD-61213

May 30, 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

RE: Section 106 Review: Brookside-Henrietta 138kV Transmission Line Switch Replacement Project,
Troy Township, Ashland County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on May 3, 2024, regarding the above reference project in Ashland 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 a switch replacement on the existing A-88 structure along the Brookside-Henrietta 138kV transmission line. No new infrastructure is planned, and the switch replacement will be at a similar height to an existing structure. Therefore, no new visual impacts are anticipated. An existing substation will be utilized for staging and access. 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. The entire APE is within a previously surveyed area. Therefore, based on this, it is the SHPO's opinion that no cultural resource studies are warranted for the project. Furthermore, as proposed, the project will have no effect on historic properties. 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 as required by 36 CFR § 800.13. If you have any questions concerning this review, please contact either myself via email at sbiehl@ohiohistory.org or Ms. Joy Williams at 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 Coordinator (archaeology)
Resource Protection and Review
State Historic Preservation Office

RPR Serial No. 1103036



**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: 05/03/2024
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): **Brookside-Henrietta 138kV Transmission Line Switch Replacement Project**

3. Internal tracking or reference number used by Federal Agency, consultant, and/or applicant to identify this project (if applicable): **429847.0022.0035**

- B. Project Address or vicinity: **Study Area is situated 0.41 miles (mi) west of the intersection of US-224 and Township Road 791 in Nova, Ohio (41.028772, - 82.272580) (Figure 1).**
- C. City/Township: **Troy Township**
- D. County: **Ashland 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:

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: **No**
(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 proposed Study Area measures approximately 0.14 acres (ac) in size, approximately 160 feet (ft) long (north-south) and approximately 50 ft wide (east-west) at its widest extents (Figure 2). The Limits of Disturbance (LOD), which corresponds to the Area of Potential Effects (APE) will be completely within the Study Area and will predominately include an 81-ft by 55-ft stone pad that will be constructed over the wetland to allow for work activities.

2. Narrative description of previous land use and past ground disturbances, if known:

Historically, the landscape was agricultural fields with development occurring predominately during the early twenty-first century. Modern aerials show initial development of the substation occurring around the Study Area between 2004 and 2006. US-224 was established as early as 1860 along with several of the nearby residential properties.

3. Narrative description of current land use and conditions:

The modern aerial imagery shows the entire Study Area is within the existing maintained utility right-of-way (ROW) within the existing access area for a substation (Figure 2). 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: **Nova, OH**

2. Township/City/Village Name: **Troy Township, Ashland County**

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 direct APE will include all areas in which construction activities associated with a switch replacement on existing structure A-88 on the Brookside-Henrietta 138kV transmission line. The indirect APE will be within a viewshed that will be based on LIDAR data, vegetation, topography, and buildings, which will reduce the indirect APE to areas with positive visibility of the Project infrastructure. No new infrastructure is planned as the Project will involve only a switch replacement at a similar height on the existing structure. While there are a few buildings in the area that are over 50 years of age, no new visual impacts are 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:

This Project involves a switch replacement on existing structure A-88 on the Brookside-Henrietta 138kV transmission line. An existing substation will be utilized for access. The Study Area for the proposed project measures approximately 0.14 ac in size (Figure 2).

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.

The file review revealed no historic properties, above-ground historic resources, Ohio Genealogical Society (OGS) Cemeteries, or archaeological sites are mapped within one (1)-mi of the proposed Project (Figure 3). The entire Study Area is mapped within the one (1) archaeological survey that has been conducted within one (1)-mi of the proposed Project.

A review of available historic maps was conducted to determine the presence of historic structures (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 1861, the region had been settled with residential buildings denoted primarily along the established transportation routes (Attachment 2, Image 1). US-224 was present with a number of widely spaced farmsteads mapped along its location. Overall, the region was rural widely spaced buildings. Nova, to the west, had the densest population at this time. The Study Area is mapped on a parcel attributed to *G.W. Hull* and adjacent to a parcel attributed to *G.G. Hull* with dwellings mapped to the east and west. Additionally, a dwelling is denoted south of the road on a parcel attributed to *A. Smith*. In 1874, the region continued to have a predominantly rural character, with widely spaced buildings on established roadways (Attachment 2, Image 2). The Study Area is mapped on a parcel attributed to *Bailey* and adjacent to a parcel with buildings attributed to *N. Biddinger*. The parcel to the south was still owned by *A. Smith* and had two (2) buildings mapped. By 1897, residential buildings were still prevalent with the Study Area on a parcel that changed ownership and was then attributed to *A. Smith*. A dwelling was still mapped to the west (Attachment 2, Image 3). Additionally, the dwelling remains denoted south of US-224 on a parcel attributed to *Joseph Smith*. The 1908 USGS map shows a landscape with buildings along the roadway (Attachment 2, Image 4). A building is mapped just north of the Study Area. The 1960 USGS has similar landscape features (Attachment 2, Image 5). The existing transmission line is first mapped with no substation noted. No buildings are mapped in the Study Area; however, several are mapped to the west and south. Modern aerial photography shows an existing substation and access area that was constructed between 2004 and 2006. The surrounding landscape is rural, predominately agricultural fields with residential properties comprising the majority of the development.

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:

 - No Historic Properties Present in the APE:

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 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

Caldwell, J.A.

1874 *Atlas of Ashland County, Ohio*. Published by J. A. Caldwell, C.E., Condit, Ohio, https://www.ohiohistory.org/wp-content/uploads/2022/01/Caldwells_Atlas_of_Ashland_County_Ohio_1874.pdf, accessed May 2, 2024.

McDonnell, John

1860 *Map of Ashland County, Ohio*. Published by John McDonnell, Philadelphia, Pennsylvania. Electronic document, <https://www.loc.gov/resource/g4083a.la000596/?r=0.563,0.827,0.506,0.316,0>, accessed May 2, 2024.

Niederheiser, F.L.

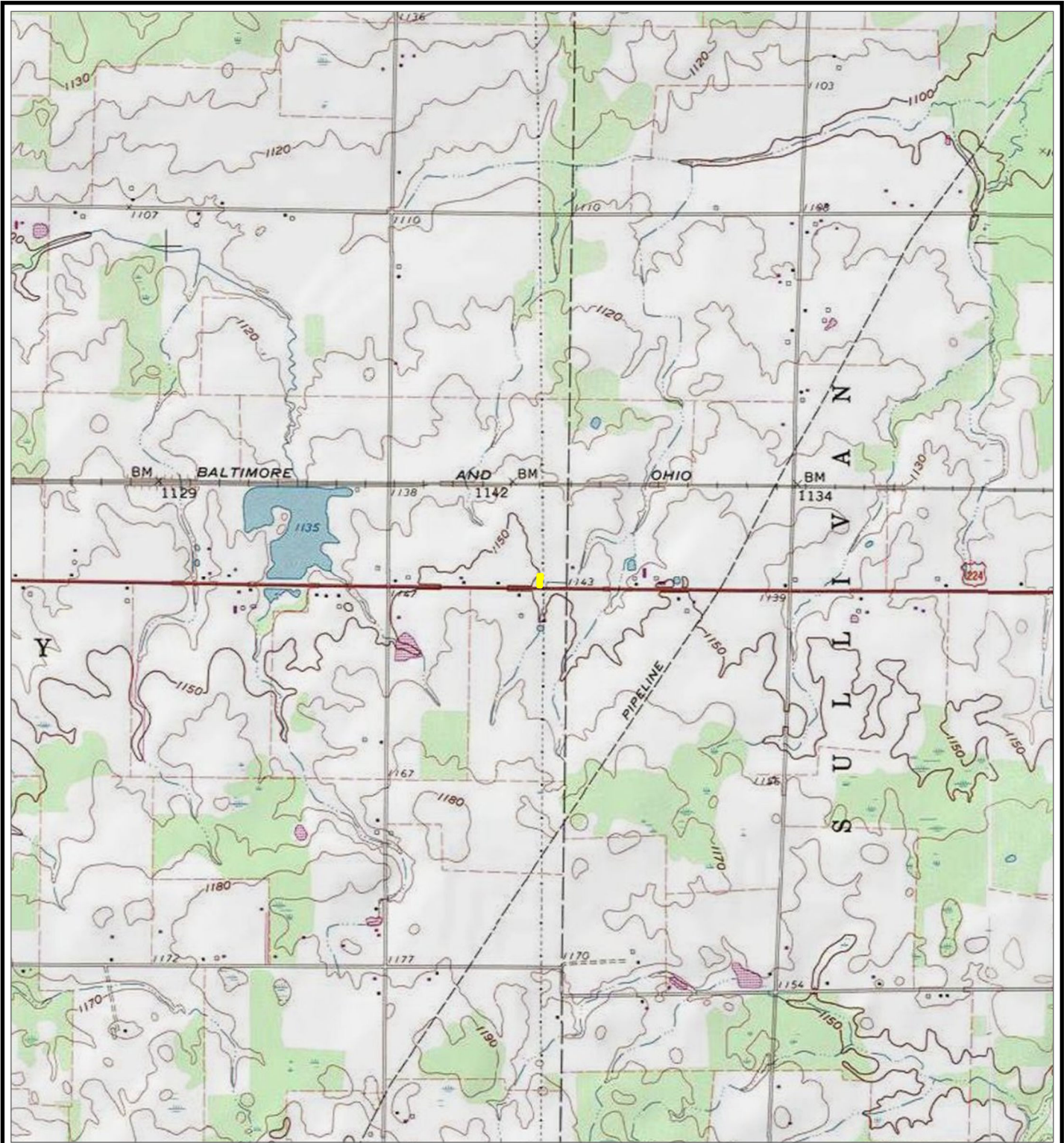
1897 *Map of Ashland County, Ohio*. Published by Wertman and Niederheiser, <https://www.loc.gov/resource/g4083a.la000598/?r=0.268,0.117,0.082,0.064,0>, accessed May 2, 2024.

United States Geographical Survey

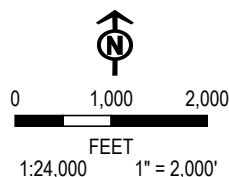
1908 *New London, OH 15-minute series topographic series*. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#14/41.0289/-82.2749>, accessed May 1, 2024.

1960 *Nova, OH 7.5-minute series topographic series*. Electronic document, <https://ngmdb.usgs.gov/topoview/viewer/#14/41.0289/-82.2749>, accessed May 1, 2024.

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 PROJECT STUDY AREA



BASE MAP: USA TOPO MAPS MAP SERVICE , NOVA QUAD

PROJECT: **FIRSTENERGY - BROOKSIDE-HENRIETTA 138 KV TRANSMISSION LINE SWITCH REPLACEMENT PROJECT**
 ASHLAND COUNTY, OH

TITLE: **PROJECT LOCATION MAP**

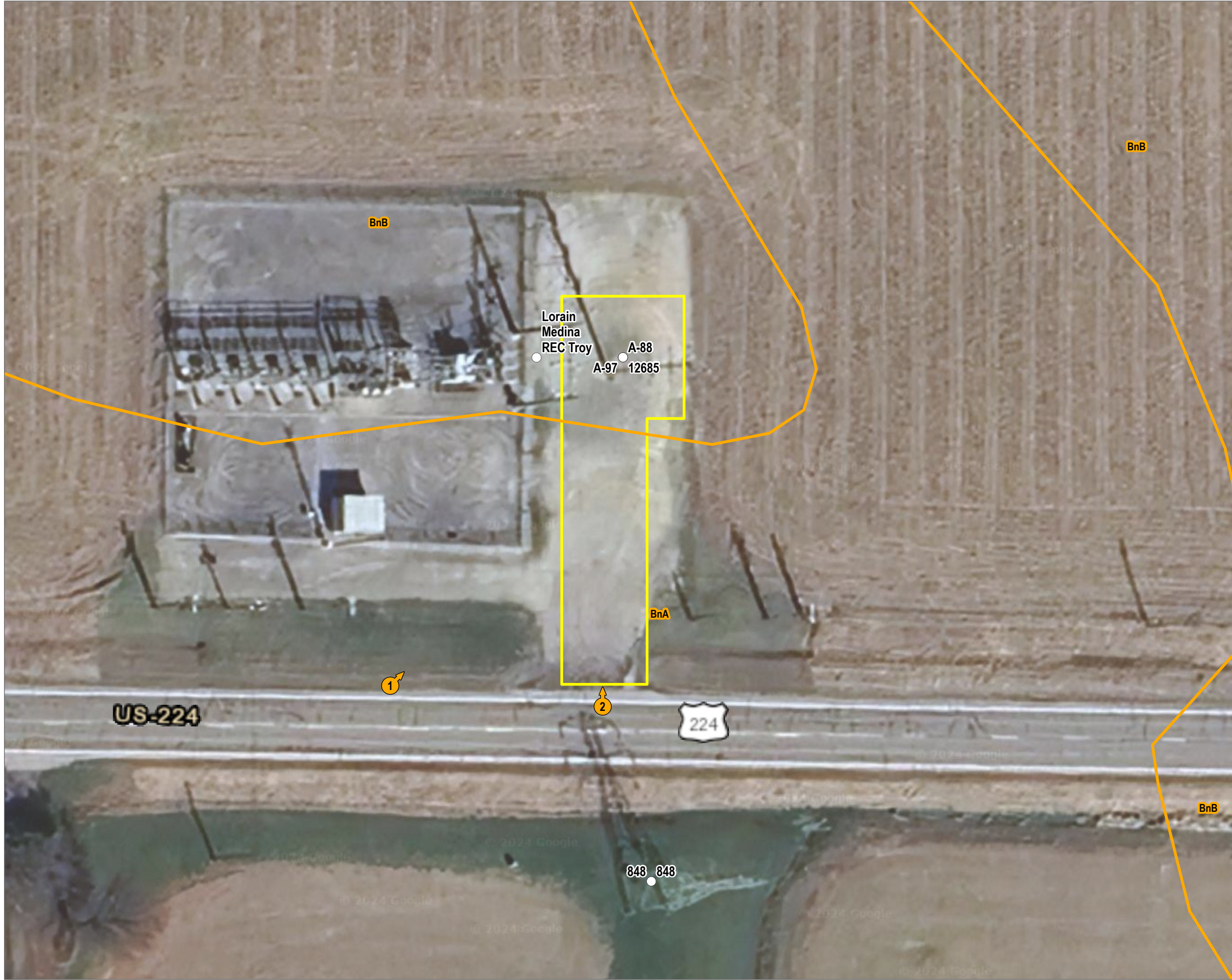
DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0035
CHECKED BY: J. MCKISSICK	FIGURE 1
APPROVED BY: B. FALKINBURG	
DATE: MAY 2024	



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

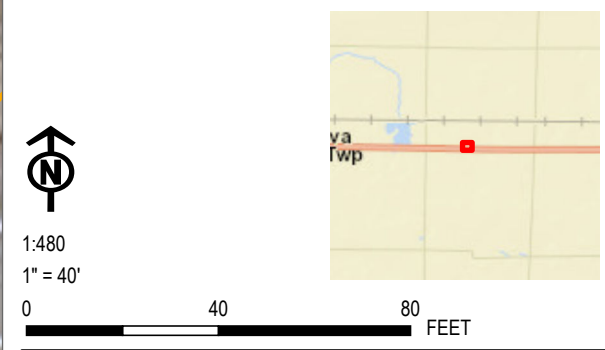
FILE: 106FORM

Coordinate System: NAD 1983 StatePlane Ohio North FIPS 3401 Feet; Map Rotation: 0
- Saved By: MOPEL on 5/1/2024, 1:53:25 PM; File Path: T:\1-PROJECTS\FirstEnergy\429847_0022_0035_BrooksideHenrietta\A88\A-APRX\106Form.aprx; Layout Name: Fig02_Aerial



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

BASE MAP: GOOGLE MAPS.



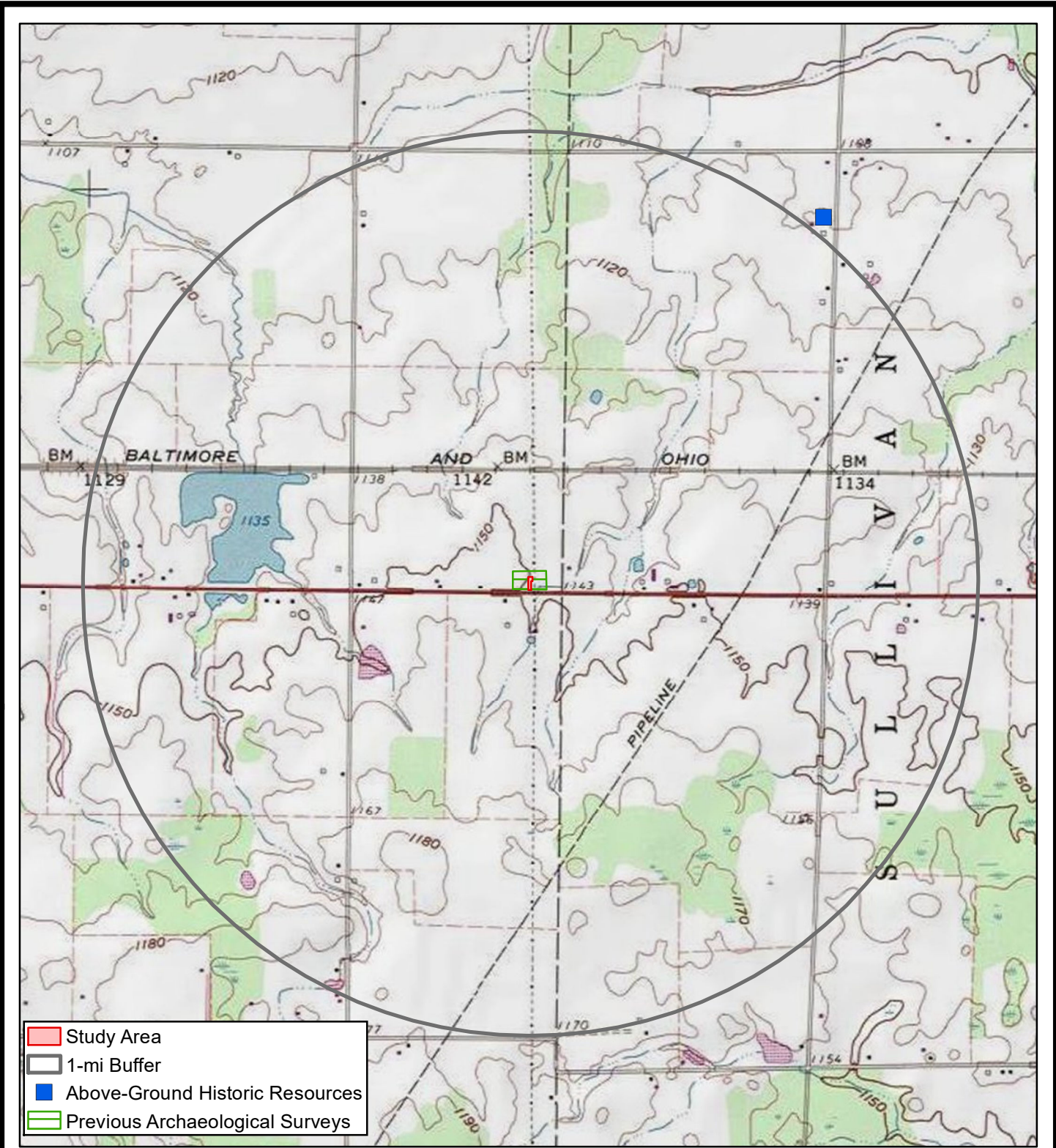
PROJECT: **FIRSTENERGY - BROOKSIDE-HENRIETTA 138 KV TRANSMISSION LINE SWITCH REPLACEMENT PROJECT**
ASHLAND COUNTY, OH

TITLE: **AERIAL BASEMAP WITH PHOTO LOCATIONS**

DRAWN BY: M. OPEL	PROJ. NO.: 429847.0022.0035
CHECKED BY: J. MCKISSICK	FIGURE 2
APPROVED BY: B. FALKINBURG	
DATE: MAY 2024	

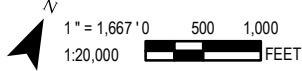
TRC 1382 WEST NINTH STREET
SUITE 400
CLEVELAND, OH 44113
PHONE: 216-344-3072

FILE: 106Form.aprx



BASE MAP FROM USGS 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLES

*Image overlay is approximate




 317 E. Carson Street Suite 113 Pittsburgh, PA 15219 <small>TRC - GIS</small>	PROJECT: Brookside-Henrietta 138 kV Transmission Line Switch Replacement Project	DRAWN BY: JUSTIN MCKISSICK CHECKED BY: CURTIS BIONDICH APPROVED BY: CURTIS BIONDICH
	TITLE: OHC DATABASE SEARCH RESULTS MAP	DATE: MAY 2024 PROJ. NO.: 429847.0022.0035 FILE: Brookside.mxd

FIGURE 3



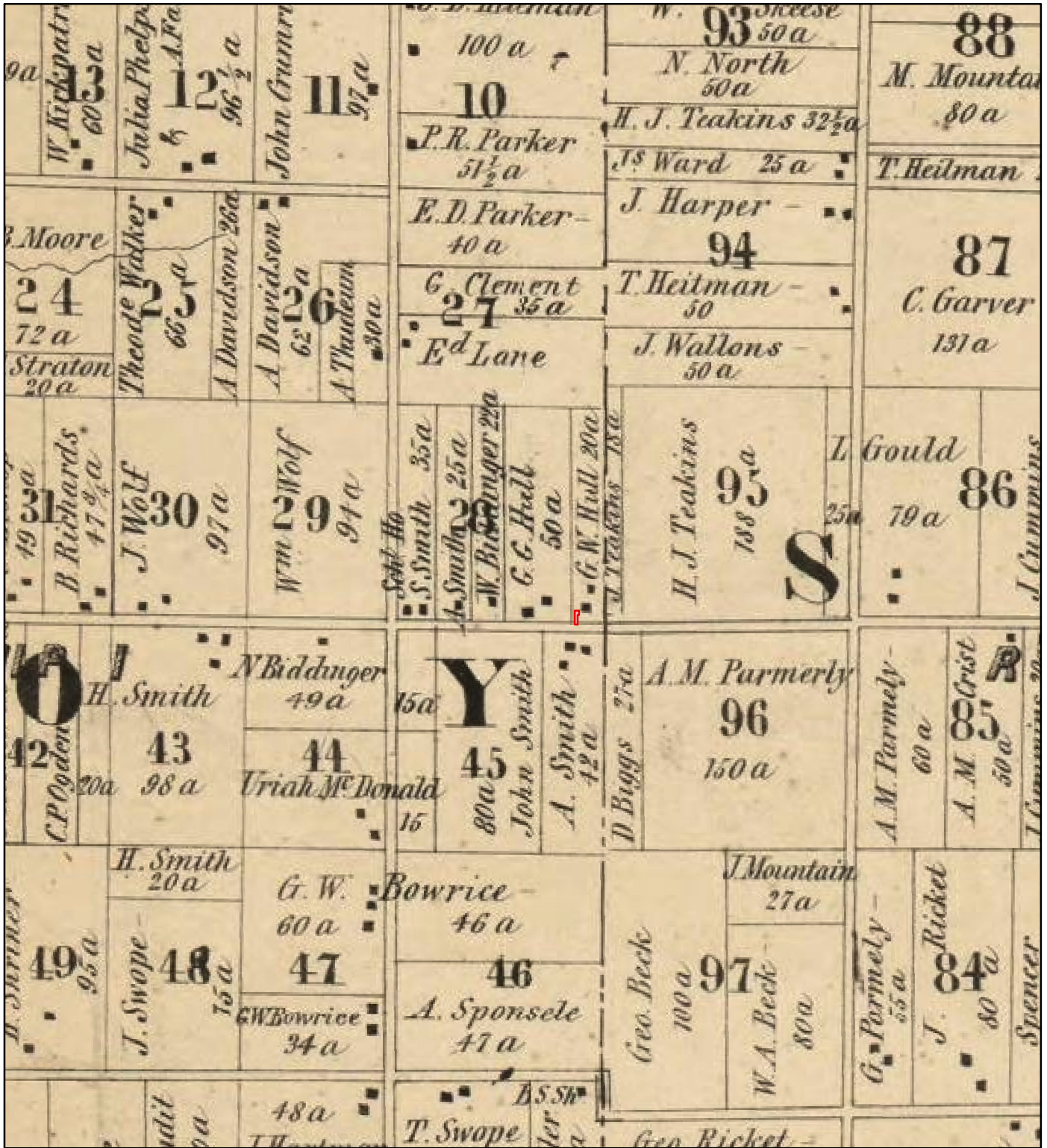
ATTACHMENT 1
Photographs

Client Name: FirstEnergy Corporation	Site Location: Troy Township, Ashland County, Ohio	Project No. 429847.0022.0035
--	--	--

Photo No. 1.	
Date: July 2022 (GoogleEarth)	
Description: Facing northeast, viewing the proposed Study Area.	

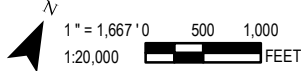
Photo No. 2.	
Date: 7/18/2023	
Description: Facing north, viewing the Study Area and existing substation from US-224.	


ATTACHMENT 2
Historic Map Images

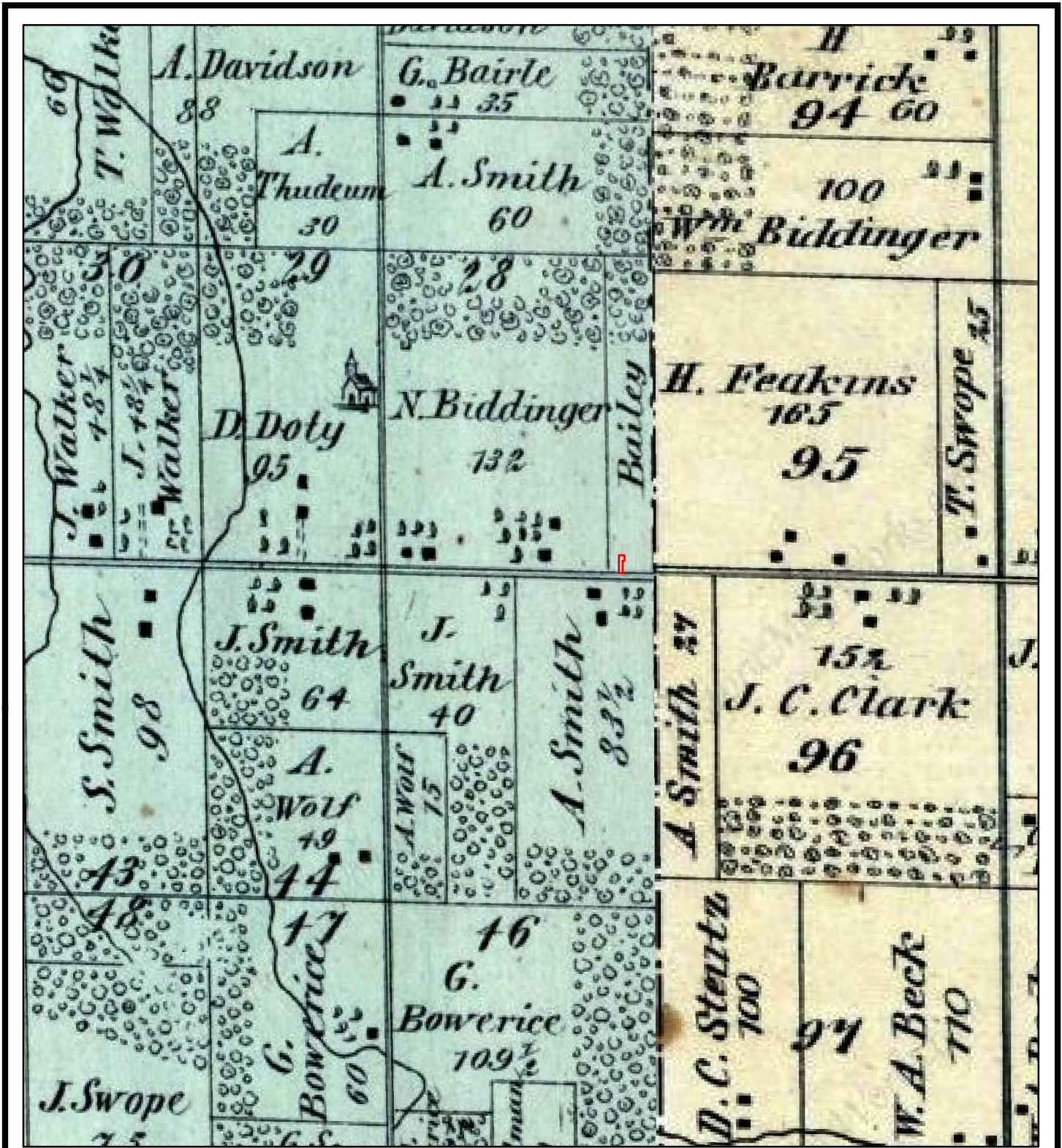


BASE MAP FROM MAP of ASHLAND COUNTY, OHIO

*Image overlay is approximate

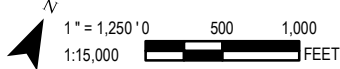


 317 E. Carson Street Suite 113 Pittsburgh, PA 15219 <small>TRC - GIS</small>	PROJECT: Brookside-Henrietta 138 kV Transmission Line Switch Replacement Project	DRAWN BY: JUSTIN MCKISSICK CHECKED BY: CURTIS BIONDICH APPROVED BY: CURTIS BIONDICH
	TITLE: Project Area circa 1861 (McDonnell)	DATE: MAY 2024 PROJ. NO.: 429847.0022.0035 FILE: Brookside.mxd



BASE MAP FROM MAP of ASHLAND COUNTY, OHIO

*Image overlay is approximate



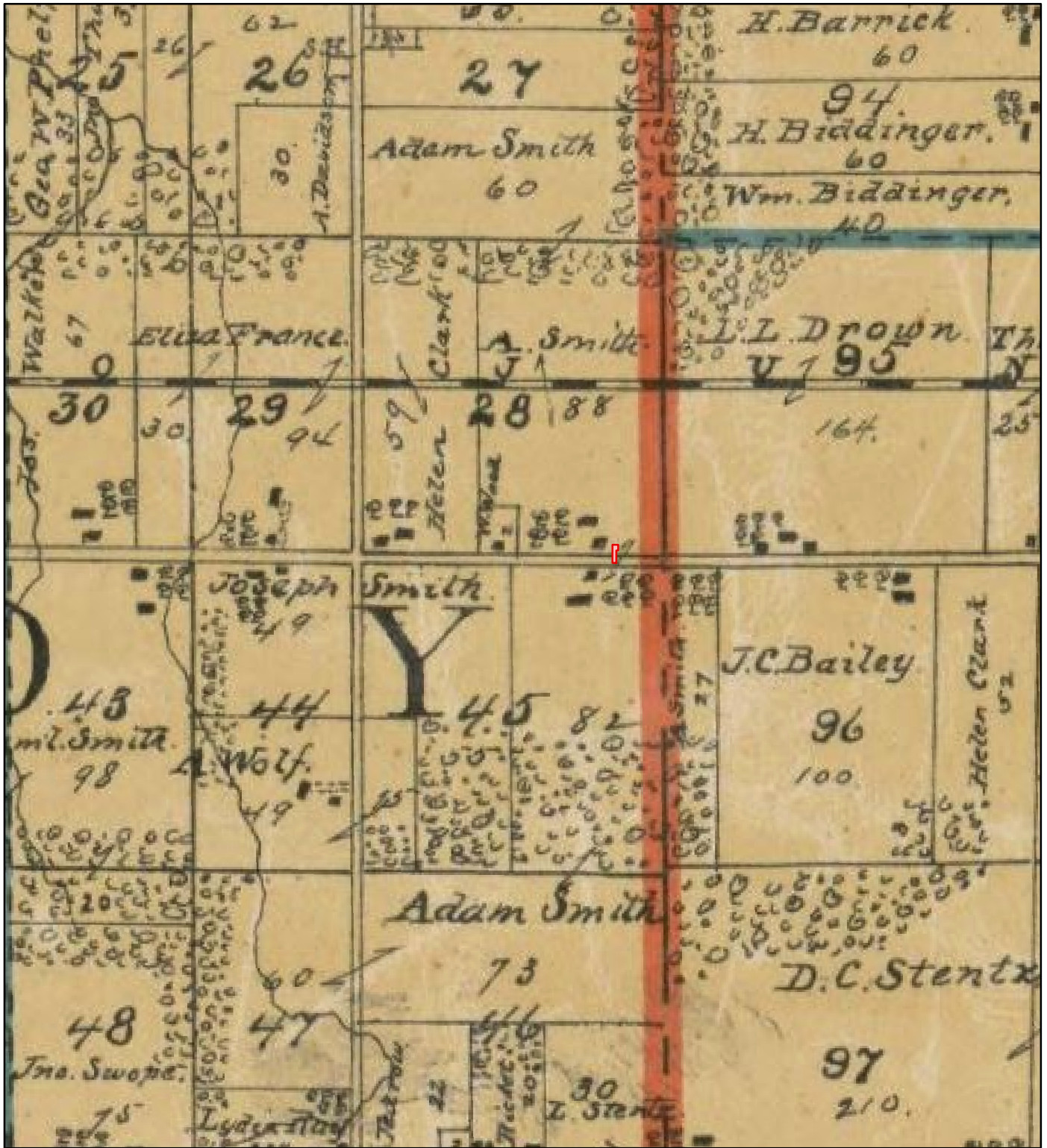
317 E. Carson Street
Suite 113
Pittsburgh, PA 15219

PROJECT:
**Brookside-Henrietta 138 kV Transmission Line
Switch Replacement Project**

TITLE:
Study Area circa 1874 (Caldwell)

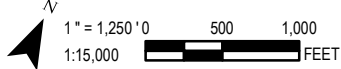
DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	MAY 2024
PROJ. NO.:	429847.0022.0035
FILE:	Brookside.mxd

Attachment 2 - Image 2



BASE MAP FROM MAP of ASHLAND COUNTY, OHIO

*Image overlay is approximate



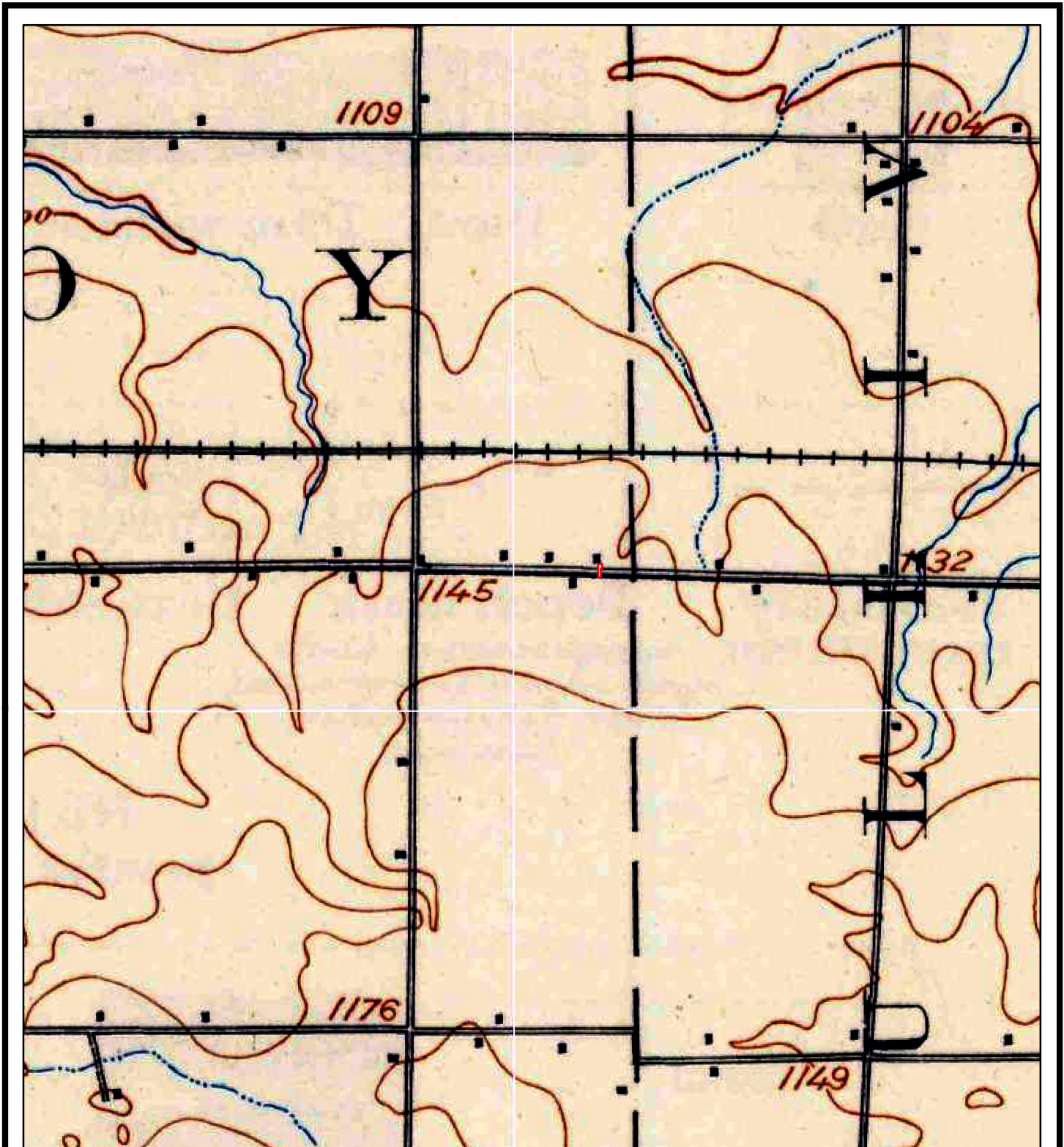
317 E. Carson Street
Suite 113
Pittsburgh, PA 15219

PROJECT:
**Brookside-Henrietta 138 kV Transmission Line
Switch Replacement Project**

TITLE:
Study Area circa 1897 (Niederheiser)

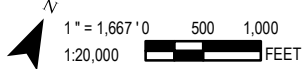
DRAWN BY:	JUSTIN MCKISSICK
CHECKED BY:	CURTIS BIONDICH
APPROVED BY:	CURTIS BIONDICH
DATE:	MAY 2024
PROJ. NO.:	429847.0022.0035
FILE:	Brookside.mxd

Attachment 2 - Image 3



BASE MAP FROM USGS 15-MINUTE SERIES TOPOGRAPHIC QUADRANGLES

*Image overlay is approximate



317 E. Carson Street
Suite 113
Pittsburgh, PA 15219

PROJECT:

**Brookside-Henrietta 138 kV Transmission Line
Switch Replacement Project**

TITLE:

Study Area circa 1908 (USGS)

DRAWN BY: JUSTIN MCKISSICK

CHECKED BY: CURTIS BIONDICH

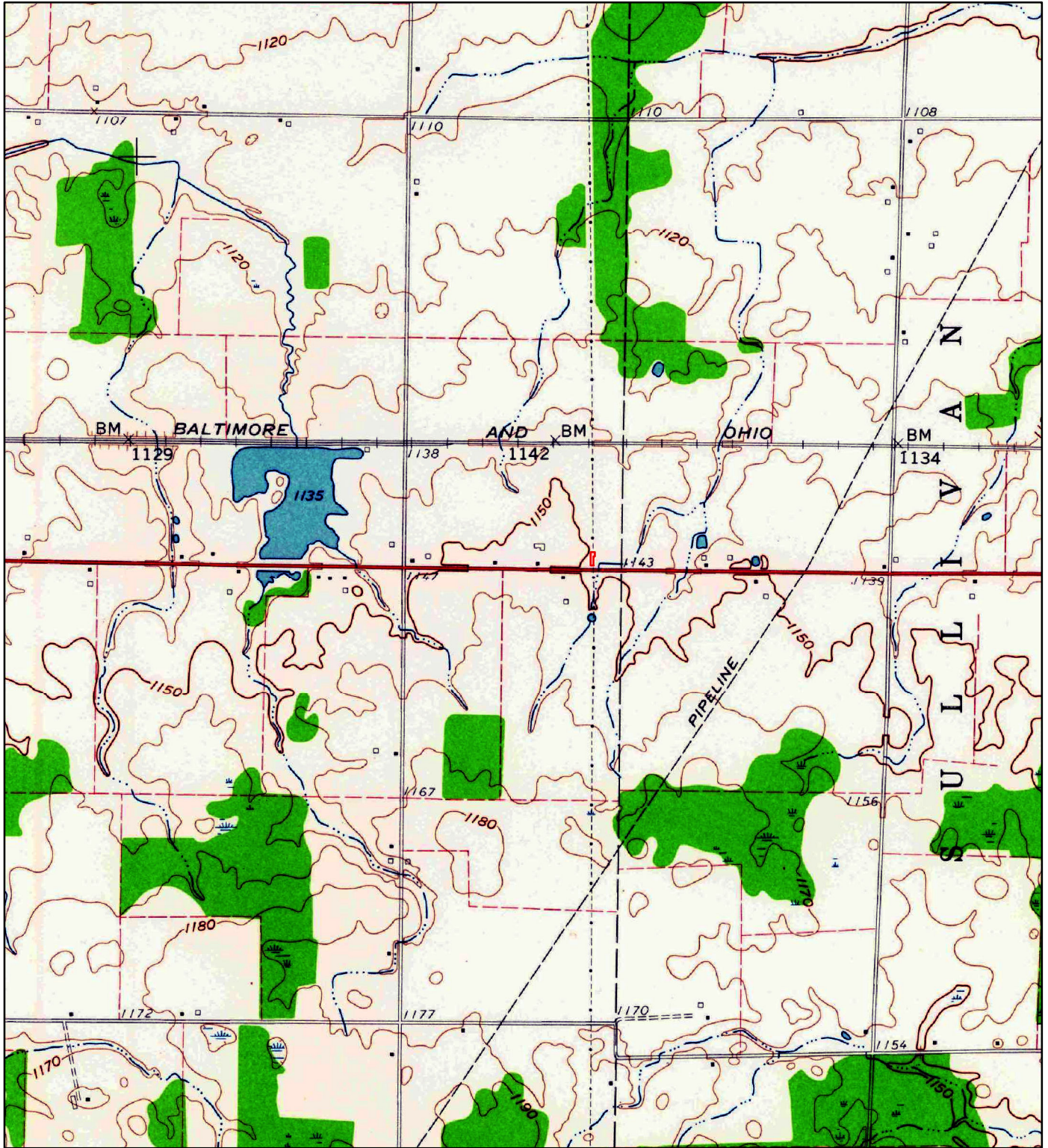
APPROVED BY: CURTIS BIONDICH

DATE: MAY 2024

PROJ. NO.: 429847.0022.0035

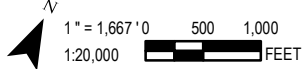
FILE: Brookside.mxd

Attachment 2 - Image 4



BASE MAP FROM USGS 7.5-MINUTE SERIES TOPOGRAPHIC QUADRANGLES

*Image overlay is approximate



317 E. Carson Street
Suite 113
Pittsburgh, PA 15219

TRC - GIS

PROJECT:

**Brookside-Henrietta 138 kV Transmission Line
Switch Replacement Project**

TITLE:

Study Area circa 1960 (USGS)

DRAWN BY: JUSTIN MCKISSICK

CHECKED BY: CURTIS BIONDICH

APPROVED BY: CURTIS BIONDICH

DATE: MAY 2024

PROJ. NO.: 429847.0022.0035

FILE: Brookside.mxd

Attachment 2 - Image 5



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate
Tara Paciorek, Chief
 2045 Morse Road – Bldg. E-2
 Columbus, OH 43229
 Phone: (614) 265-6661
 Fax: (614) 267-4764

August 14, 2023

Jenna Slabe
 TRC Companies, Inc.
 1382 W 9th St, Suite 400
 Cleveland, Ohio 44113

Re: 23-0836; Brookside-Henrietta 138 kV Transmission Line Switch Replacement

Project: The proposed project involves a switch replacement on existing structure A-88 on the Brookside-Henrietta 138kV transmission line.

Location: The proposed project is located in Troy Township, Ashland 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).

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

The project is within the range of the Iowa darter (*Etheostoma exile*), a state endangered fish, the lake chubsucker (*Erimyzon sucetta*), a state threatened fish, and the greater redhorse (*Moxostoma valenciennesi*), a state threatened 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 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 of sufficient size to provide suitable habitat, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonius*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

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

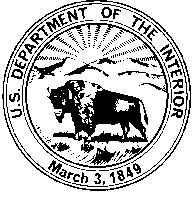
Water Resources: The Division of Water Resources has the following comment.

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 at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator

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



August 8, 2023

Project Code: 2023-0104324

Dear Ms. Jenna Slabe:

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

Federally Threatened and Endangered Species: Due to the project type, size, location, and the proposed implementation of seasonal tree cutting (clearing of trees ≥ 3 inches diameter at breast height between October 1 and March 31) to avoid impacts to the endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*), and the proposed endangered tri-colored bat (*Perimyotis subflavus*) we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant

species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

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

Sincerely,



Patrice Ashfield
Field Office Supervisor