## AMERICAN TRANSMISSION SYSTEMS, INCORPORATED A FIRSTENERGY COMPANY

## **CONSTRUCTION NOTICE**

## Galion-Roberts South 138 kV Transmission Line Loop to Selma Project

**Case No. 24-0668 -EL-BNR** 

**October 2, 2024** 

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

**CONSTRUCTION NOTICE** 

Galion-Roberts South 138 kV Transmission Line

**Loop to Selma Project** 

The following information is being provided in accordance with Chapter 4906-6 of the Ohio

Administrative 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 ("Board") as a Construction Notice.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

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

Name of Project: Galion-Roberts South 138 kV Transmission Line

Loop to Selma Project ("Project")

Reference Number: 2102

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

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy

company, is proposing to construct an approximately 235-foot long 138 kV transmission

line loop from the existing Galion-Roberts South 138 kV Transmission Line to the new

Selma Substation. The Selma substation is currently under construction by Marion

County Solar Project, LLC, and was approved and certificated in OPSB Case No. 21-

0036-EL-BGN. Once the substation construction is complete, ownership of the substation

will be transferred to ATSI.

The proposed 138 kV loop will require the installation of one (1) new three-pole steel

strain/tap structure on concrete foundations (proposed Str. #3824B) and a 235-foot

extension of the existing transmission line directly to the substation take off structure. In

addition to the tap structure, the Project will require the replacement of two (2) existing

switches along the existing transmission line centerline. The switch replacements will

require the removal of one existing structure (Str. #12016) which currently supports both existing switches, SW A-100 and SW A-121, that are being replaced with two new switches, one each on single monopole steel pole structures on concrete foundations (proposed Str. #3831B and Str.#3833B).

The general location of the Project is shown in **Exhibit 1**, a partial copy of the United States Geologic Survey Topographic Map, Marion County, OH, Quad Map. **Exhibit 2** is a partial copy of ESRI aerial imagery showing the Project area. The general layout is shown in **Exhibit 3 and 3a**. The Project is located in Marion Township, Marion County, Ohio.

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

The Project meets the requirements for a Construction Notice because the Project is within the types of projects defined by Items (1)(d)(i) and (2)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of OAC 4906-101. Item (1)(d)(i) and (2)(a) states:

- (1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:
  - (d) Line(s) primarily needed to attract or meet the requirements of a specific customer or customers, as follows:
    - (i) The line is completely on property owned by the specific customer or the applicant.
- (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 (1)(d)(i) because the proposed 138 kV transmission line loop is wholly located on the property of the customer Marion County Solar Project, LLC. The Project also is within the requirements of Item (2)(a) because it requires the addition of new structures on an existing transmission line for two miles or less.

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

This Project is needed to accommodate the Marion County Solar Project, LLC., which was approved by the OPSB in Case No. 21-0036-EL-BGN on November 18, 2021.

PJM has assigned the network upgrade identification number n6708 for the proposed Galion-Roberts South 138 kV Transmission Line Loop into the new Selma Substation.

#### 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 ("LTFR"). This map was submitted to the Public Utilities Commission of Ohio ("PUCO") in Case No. 24-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. This map is incorporated by reference only. The Project is included on page 67 in the 2024 LTFR. The general location and layout of the project area is shown in **Exhibits 1 and 2**.

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

No alternatives were considered for this Project as there were no other viable transmission solutions. The Galion-Roberts South 138 kV Transmission Line offers the

most direct and economical solution with the least environmental impacts, for a transmission connection to Selma Substation.

## 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 copy of this Construction Notice, along with other Project information, on FirstEnergy's website:

https://www.firstenergycorp.com/about/transmission\_projects/ohio.html.

During all phases of this Project, the public may ask questions, submit comments or contact ATSI through the transmission projects hotline at 1-888-311-4737 or via email at: <a href="mailto:transmissionprojects@firstenergycorp.com">transmissionprojects@firstenergycorp.com</a>.

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

Construction for this Project is expected to begin as early as February 2025 and completed by May 2025.

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

**Exhibit 1** provides a partial copy of the United States Geologic Survey, Marion County, OH, Quad Map. **Exhibit 2** provides a partial copy of ESRI aerial imagery of the Project area.

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

The proposed loop portion of the Project is located wholly within property that was secured by Marion County Solar Project, LLC (parcel number 190040012100) per OPSB Case No. 21-0036-EL-BGN.

The proposed structure addition/ switch replacement portion of the Project is located wholly within ATSI's existing right of way on a single property (parcel ID 412270000500). No new easement will be needed for the completion of the project.

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

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

The transmission line construction will have the following characteristics:

Voltage: 138 kV

Conductors: 795 kcmil 26/7 ACSR

Static Wire: 7#8 Alumoweld Insulators: Porcelain and Glass

ROW Width: 100 ft

Structure Types: Exhibit 4: 138 kV Double Circuit Steel Pole

Strain, Three-Pole Tap Structure

Exhibit 5: 138 kV Single Circuit Steel Pole

Strain, Switch Structure

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

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

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

The estimated cost for the proposed Project is \$4,245,000. These costs are fully reimbursable from the customer.

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

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

The Project is located in Marion Township, Marion County, Ohio. The Project area is on existing right of way in an area of agricultural and industrial use.

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

A list of all agricultural land and acreage, including agricultural district land, is provided in Exhibit 6.

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

As part of the investigation for this Construction Notice, TRC Companies, Inc. (TRC) submitted a request to the Ohio Historic Preservation Office (OHPO) on behalf of ATSI to review and provide comments on May 22, 2024, for the Project Study Area (Area of Potential Effects or APE) with a one (1)-mile search radius. On July 10, 2024, SHPO replied to the request and the response is attached as **Exhibit 7**. 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 a catalog of all historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The data revealed one (1) NRHP-listed above-ground historic resource, the Marion Township Sub-District #8 School (Ref. No.: 07000027), which is located 0.97-mile northeast of the proposed Project. Additionally, there are three (3) above-ground historic resources (DOE ID 1217, 3050, and 83509) that have been recommended as potentially eligible recorded 0.75 mile north-northwest, 0.76-mile northeast, and 0.67 mile southeast, respectively, of the proposed Project. A map of the surveyed area and a summary of these sites are also listed in **Exhibit 7**.

The Study Area for the proposed Project measures approximately 5.45 acres in size. While there are several buildings in the area that are over 50 years of age, all repaired or replaced infrastructure will be at or below existing height, therefore, no new visual impacts are anticipated. A review of modern aerial imagery shows the Study Area within the existing overhead utility corridor that is composed of agricultural fields. The proposed Project will not have any adverse effects on known historic properties.

# 4906-6-05 (B)(10)(d): Construction Filings with Local, State and Federal Governmental Agencies

Table 1 shows the list of government agency requirements for the Project.

**Table 1. List of Government Agency Requirements.** 

Agency	Documents
ODOT	Temporary Access Permit

# 4906-6-05 (B)(10)(e): Endangered, Threatened, Rare and Designated 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 June 20, 2024, stated that there are no records of state or federally listed plants or animals within one mile of the specified Project area. A copy of ODNR's Office of Real Estate's response is included as **Exhibit 8**. A list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in Table 2.

Table 2. List of Endangered, Threatened, and Rare Species Within Range of Project Study Area

Common Name	Scientific Name	State Listed Status	Federal Listed Status	Affected Habitat			
	Bird						
Northern harrier	Circus hudsonius	Endangered	N/A	Large marshes and grasslands.			
		Mammals					
Indiana Bat	Myotis sodalis	Endangered	Endangered	Trees and forests.			
Little Brown Bat	Myotis lucifugus	Endangered	N/A	Trees and forests.			
Northern Long-eared Bat	Myotis septentrionalis	Endangered	Endangered	Trees and forests.			
Tricolored Bat	Perimyotis subflavus	Endangered	N/A	Trees and forests.			
		Mussels					
Clubshell	Pleurobema clava	N/A	Endangered	Freshwater perennial streams.			
Pondhorn	Uniomerus tetralasmus	Threatened	N/A	Freshwater perennial streams.			
Rabbitsfoot	Quadrula cylindrica cylindrica	N/A	Threatened	Freshwater perennial streams.			
Rayed bean	Villosa fabalis	N/A	Endangered	Freshwater perennial streams.			
Snuffbox	Epioblasma triquetra	N/A	Endangered	Freshwater perennial streams.			

As part of the investigation, TRC also submitted a request to the US Fish and Wildlife Service ("USFWS") for an Ecological Review to research the presence of any endangered, threatened, rare, or designated species within one (1) mile of the Project Area. A copy of USFWS's Ecological Review response, dated June 3, 2024, is included as **Exhibit 9.** The response states that due to the Project, type, size, and location, no adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat are anticipated.

The response also indicated that the Project is within the range of the Indiana bat (Myotis sodalis), a state endangered and federally endangered species; the northern long-eared bat (Myotis septentrionalis), a state endangered and federally endangered species; the little brown bat (Myotis lucifugus), a state endangered species; and the tricolored bat (Perimyotis subflavus), a state endangered species. Currently as proposed, no tree clearing is anticipated within the Project Study Area; therefore, the Project will not impact these bat species. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed for ATSI and submitted

to ODNR for concurrence on June 28, 2024. ODNR responded on July 2, 2024, attached as **Exhibit 10**, concurring that no caves, cliffs, or mine openings occur in the Project Area. Therefore, the Project is not likely to impact hibernating bats. No tree cutting or subsurface impacts to a hibernaculum are proposed, therefore this Project will not impact these species.

The Project is within the range of the following federally listed mussel species: clubshell (*Pleurobema clava*), rayed bean (*Villosa fabalis*), snuffbox (*Epioblasma triquetra*), rabbitsfoot (*Quadrula cylindrica cylindrica*), and the state threatened pondhorn (*Uniomerus tetralasmus*). 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. Due to the Project location, and that there is no in-water work proposed in a perennial stream of sufficient size, this Project will not impact these species.

The Project is also within the range of the northern harrier (*Circus hudsonius*), a state endangered bird. Northern harriers often nest in loose colonies and hunt over grasslands. Due to the extensive surrounding agricultural land use and a lack of suitable habitat within the Project Study Area, this species is not likely present, and impacts are not anticipated.

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

TRC conducted a wetland and stream delineation for this Project on May 1, 2023, as shown in Exhibit 11. The Project Study Area is approximately 5.45 acres, located in Marion Township, Marion County, Ohio. No wetland or waterbody resources were identified or delineated within the Project Study Area. The Project Study Area consists of an existing, transmission line right-of-way (ROW) and active row cropping within agricultural land use. TRC did not observe the presence of any of the threatened and/or endangered species or habitat during the field investigation due to the highly maintained nature of the utility ROW and agricultural land use.

The Limits of Disturbance (LOD) will be completely within the Study Area and will predominantly include an access road measuring approximately 20-ft wide, along with a

50-ft by 50-ft work and staging area surrounding the structure replacements. NWP 57 (effective March 15, 2021, valid through March 14, 2026), authorizes the construction of access roads for the construction and maintenance of electric utility lines or telecommunication lines, including overhead lines and substations, in nontidal waters of the United States, provided the activity does not cause the loss of greater than 0.5-acre of waters of the United States. Nationwide Permit Regional General Conditions were reviewed regarding this Project. This Project is located in Marion Township, Marion County, Ohio, which is within the US Army Corps of Engineers (USACE) Huntington Regulatory District. The Project location is not listed in Appendix 1 to Regional General Condition 5(a) (Endangered Species and Threatened Species). Since there will not be any wetland impacts and NWP 57 conditions are met and not exceeded, there is no potential trigger for a Section 404 Pre-Construction Notification to USACE.

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

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

Construction and operation of the proposed Project will be in accordance with the requirements specified in the latest revision of the National Electrical Safety Code as adopted by the PUCO and will meet all applicable safety standards established by the Occupational Safety and Health Administration.

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

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

This Construction Notice is being sent concurrently with docketing to the following officials in the Marion Township, Marion County, Ohio. A copy will also be provided to the Marion Public Library for public review/reference.

## **Marion County**

Kerr Murray Marion County Commissioner 222 West Center Street Marion, OH 43302 kmurray@co.marion.oh.us

Andy Appelfeller Marion County Commissioner 222 West Center Street Marion, OH 43302 aappelfeller@co.marion.oh.us Mark Davis Marion County Commissioner 222 West Center Street Marion, OH 43302 mdavis@co.marion.oh.us

Bradley Irons P.E. P.S. Marion County Engineer 222 West Center Street Marion, OH 43302 birons@co.marion.oh.us

Marion Soil and Water Conservation District 1100 East Center Street Marion, Ohio 43302 aeno@landcan.org

## **Marion Township**

Larry Ballinger
Marion Township
Trustee
1228 E Fairground St.
Marion, OH 43302
lballinger@mariontwp.org

Karen McCleary Marion Township Trustee 1228 E Fairground St. Marion, OH 43302 karen.mccleary09@gmail.com Ben Creasap Marion Township Trustee 1228 E Fairground St. Marion, OH 43302 midnightlynx@hotmail.com Sheila Perin Marion Township Fiscal Officer 1228 E Fairground St. Marion, OH 43302 sperin@mariontwp.org

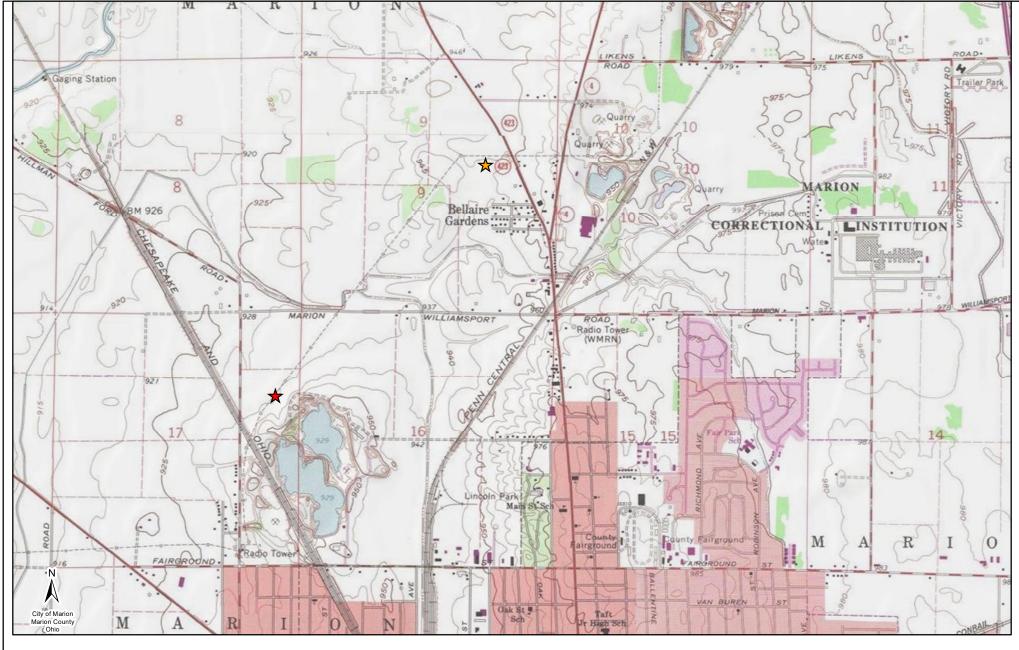
## **Library**

Gary Branson
Director
Marion Public Library
445 E. Church Street
Marion, OH 43302
director@marionlibrary.org

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

Information is posted at <a href="www.firstenergycorp.com/about/transmission\_project/ohio.html">www.firstenergycorp.com/about/transmission\_project/ohio.html</a> 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 Board with proof of compliance for OAC Rule 4906-6-07(A)(3).

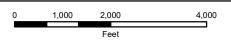
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★ Loop Project Area



#### Reference:

USGS Topographical Overlay

#### Coordinate System:

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

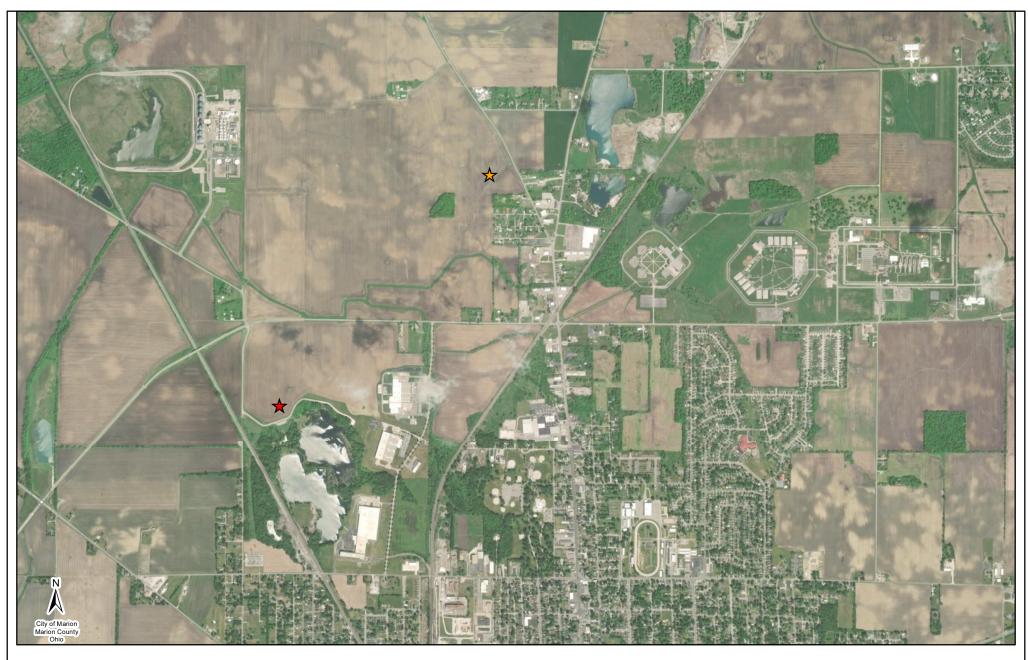


## **EXHIBIT 1**

ATSI &

American Transmission Systems, Inc.

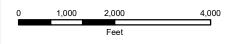
Galion-Roberts South 138 kV Transmission Line Loop to Selma Project







★ Loop Project Area



## Reference: ESRI Aerial Imagery

Coordinate System:

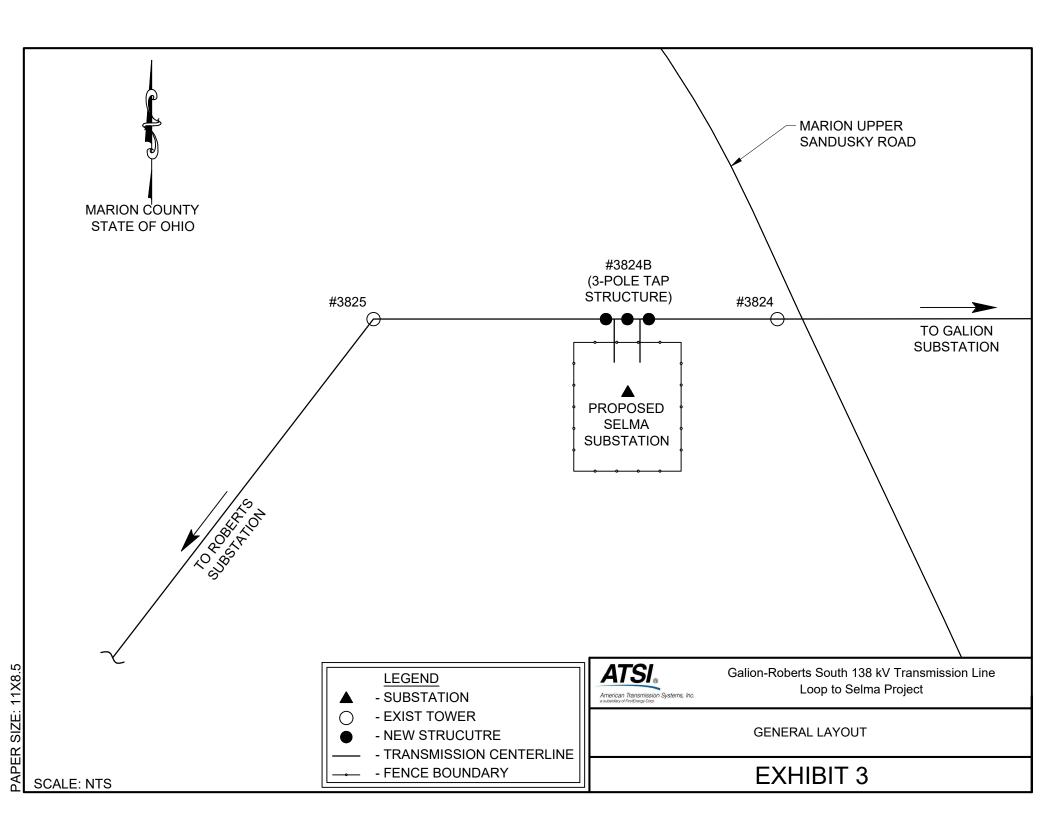
NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US

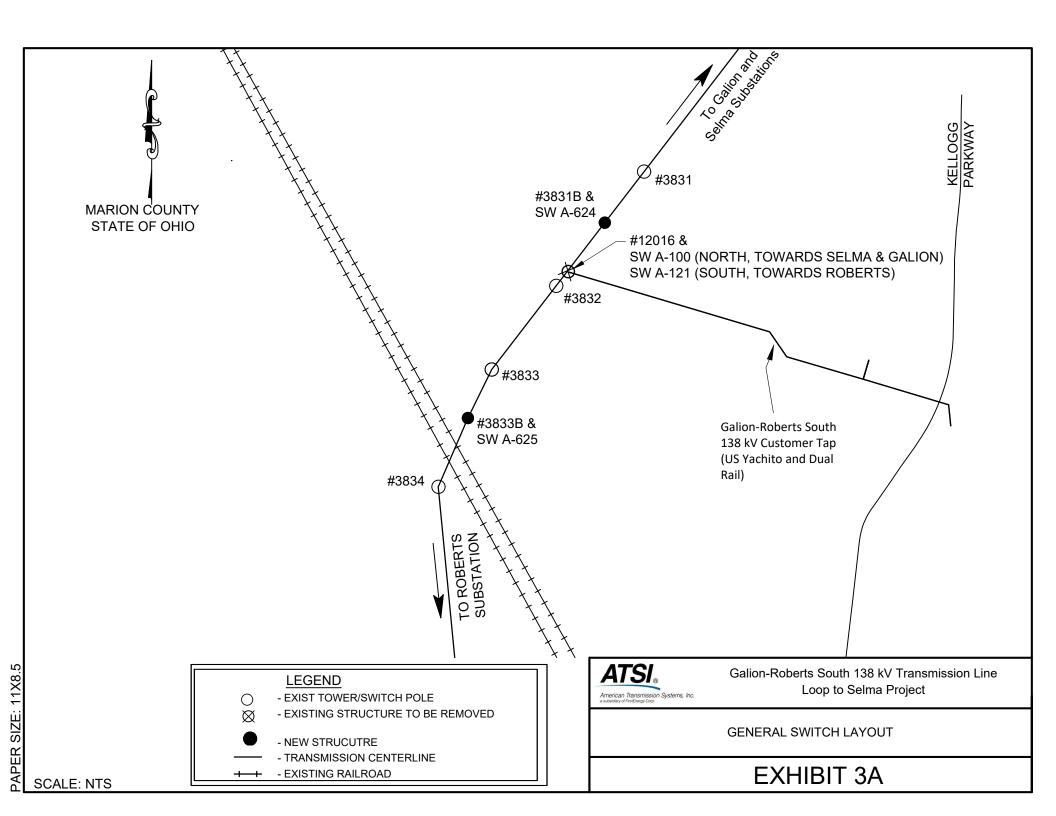


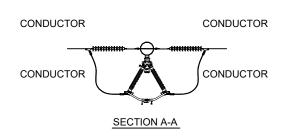
## **EXHIBIT 2**

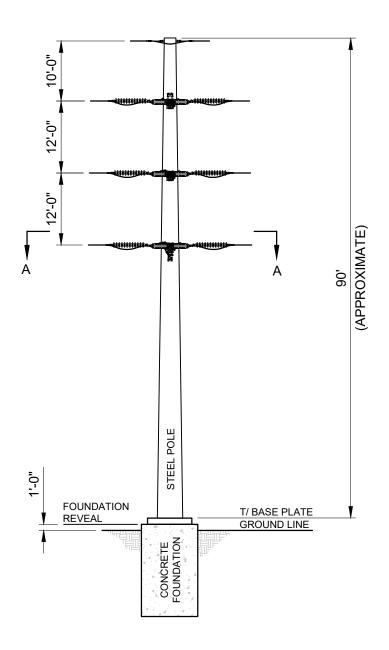
American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.

Galion-Roberts South 138 kV Transmission Line Loop to Selma Project









NOTES: EXHIBIT DEPICTION CAN BE APPLIED TO ANY TYPE OF SINGLE CIRCUIT SWITCH STEEL POLE WITH STRAIN CONFIGURATION.



Galion-Roberts South 138 kV Transmission Line Loop to Selma Project

138kV SINGLE CIRCUIT STEEL POLE STRAIN, SWITCH

**EXHIBIT 5** 

APN	Acreage	Easement Status	Agricultural District (Yes/No)	Agricultural District Expiration Year
190040012100	756.111	Existing	Yes	2027
412270000500	76.002	Existing	No	N/A

<sup>\*</sup>Note: This list of affected landowners is for "impacted" parcels only and the subject list is NOT for mailing purposes.

Exhibit 6



In reply refer to: 2024-MAR-61567

July 10, 2024

Justin McKissick, MA, RPA Project Archaeologist/Field Director TRC Environmental Corporation 317 E Carson Street, Suite 113 Pittsburgh, PA 15219

Email: <u>JMcKissick@trccompanies.com</u>

RE: Section 106 Review: Galion-Roberts South 138kV Loop to Selma Substation Project, Marion Township, Marion County, Ohio

Dear Mr. McKissick:

This letter is in response to the correspondence received on June 12, 2024, regarding the above-referenced project in Marion 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 construction of a new substation loop that will connect the existing Galion-Roberts South 138kV transmission line with the proposed Selma Substation. Based on information submitted by you, which included a Project Summary Form, no historic properties or districts are located within the direct Area of Potential Effect (APE), as defined by you. However, our records indicate the one previously recorded archaeological site, 33MN243, is within the APE. Furthermore, the entire APE is within a previous cultural resource survey. This survey determined that site 33MN243 is not eligible for the National Register of Historic Places. Based on this and the fact that new infrastructure is anticipated to be at or below the surrounding, existing utility corridor infrastructure, 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 new/additional 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 me via email at <a href="mailto:sbiehl@ohiohistory.org">sbiehl@ohiohistory.org</a>. Thank you for your cooperation.

Sincerely,

Stephen M. Biehl, Project Reviews Manager (archaeology)

Resource Protection and Review State Historic Preservation Office

Stephen M. Biell

RPR Serial No. 1103574

## **EXHIBIT 7**

# Ohio archaeological Inventory (OAI), The Ohio Historic Inventory (OHI), previous cultural resource surveys, and the Ohio Genealogical Society (OGS) cemetery inventory

National Historic Registered Places - Listed

Resource Name	Address	City	County
Marion Township Sub-	2473 SR 4 N	Marion	Marion
District #8 School			

National Historic Registered Places – Eligible

Resource Name	Address	Municipality	County
Sr 423: Marion Upper Sandusky Rd	2347 SR 423	Marion	Marion
Marion North	2319 SR 4	Marion	Marion
Marion County Solar Project	1330 N Main St - WMRN	Marion	Marion
	Radio Broadcasting Bldg		

#### **Above Ground Historic Resources**

OHI Number	Name	Address	Municipality	County
MAR0003709	Dr Kantzer House	1265 N Main St (SR 423)	Marion	Marion
MAR0034609	Marion Township Dist #8 School	2473 SR 4 N	Marion (Township of)	Marion
MAR0034709	Residence	2347 SR 423	Marion (Township of)	Marion
MAR0037409	Residence	2319 SR 4	Marion (Township of)	Marion
MAR0050909	WMRN Radio	1330 North Main	Marion	Marion
	Broadcasting Building	Street		

List of OAI Listed Archaeological Sites

OAINUMBER	Affiliation	County	Quad Name
MN0079	Prehistoric	Marion	Marion West
MN0080	Prehistoric and Historic	Marion	Marion West
MN0126	Prehistoric and Historic	Marion	Marion West
MN0127	Prehistoric	Marion	Marion West
MN0128	Prehistoric	Marion	Marion West
MN0129	Prehistoric	Marion	Marion West
MN0130	Prehistoric	Marion	Marion West
MN0131	Prehistoric	Marion	Marion West
MN0132	Prehistoric	Marion	Marion West
MN0133	Prehistoric	Marion	Marion West
MN0134	Prehistoric	Marion	Marion West
MN0135	Prehistoric	Marion	Marion West
MN0138	Prehistoric	Marion	Marion West
MN0142	Prehistoric	Marion	Marion West
MN0189	Prehistoric and Historic	Marion	Marion West
MN0190	Prehistoric and Historic	Marion	Marion West
MN0191	Prehistoric	Marion	Marion West
MN0192	Prehistoric	Marion	Marion West
MN0193	Prehistoric	Marion	Marion West
MN0194	Prehistoric	Marion	Marion West
MN0195	Historic	Marion	Marion West

MN0196	Prehistoric and Historic	Marion	Marion West
MN0197	Prehistoric	Marion	Morral
MN0198	Prehistoric and Historic	Marion	Marion West
MN0199	Prehistoric	Marion	Marion West
MN0200	Prehistoric	Marion	Marion West
MN0201	Historic	Marion	Marion West
MN0202	Prehistoric and Historic	Marion	Marion West
MN0203	Prehistoric Prehistoric	Marion	Morral
MN0204	Prehistoric and Historic	Marion	Marion West
MN0205	Prehistoric	Marion	Marion West
MN0206	Prehistoric	Marion	Marion West
MN0207	Prehistoric	Marion	Marion West
MN0208	Prehistoric	Marion	Marion West
MN0209	Prehistoric	Marion	Marion West
MN0210	Prehistoric	Marion	Marion West
MN0211	Prehistoric	Marion	Marion West
MN0212	Prehistoric	Marion	Marion West
MN0213	Prehistoric and Historic	Marion	Marion West
MN0214	Prehistoric Prehistoric	Marion	Marion West
MN0215	110111000110	Marion	171011111111111111111111111111111111111
MN0216	Prehistoric	Marion	Marion West
MN0217	Prehistoric	Marion	Marion West
MN0218	Prehistoric	Marion	Marion West
MN0219	Prehistoric	Marion	Morral
MN0220	Prehistoric and Historic	Marion	Marion West
MN0221	Prehistoric and Historic	Marion	Marion West
MN0222	Prehistoric and Historic	Marion	Marion West
MN0223	Prehistoric Prehistoric	Marion	Marion West
MN0224	Prehistoric and Historic	Marion	Morral
MN0225	Prehistoric	Marion	Marion West
MN0226	Prehistoric	Marion	Marion West
MN0227	Prehistoric	Marion	Marion West
MN0228	Prehistoric	Marion	Marion West
MN0229	Historic	Marion	Morral
MN0230	Prehistoric	Marion	Marion West
MN0231	Prehistoric and Historic	Marion	Morral
MN0232	Prehistoric and Historic	Marion	Morral
MN0233	Historic	Marion	Morral
MN0234	Historic	Marion	Morral
MN0235	Prehistoric	Marion	Marion West
MN0236	Prehistoric and Historic	Marion	Marion West
MN0237	Prehistoric	Marion	Morral
MN0238	Historic	Marion	Morral
MN0239	Prehistoric	Marion	Morral
MN0240	Prehistoric and Historic	Marion	Morral
MN0241	Prehistoric	Marion	Marion West
MN0242	Prehistoric	Marion	Marion West
MN0243	Prehistoric	Marion	Marion West
MN0244	Prehistoric and Historic	Marion	Marion West
MN0245	Prehistoric and Historic	Marion	Marion West
MN0246	Prehistoric and Historic	Marion	Marion West
MN0247	Prehistoric and Historic	Marion	Marion West
MN0248	Prehistoric	Marion	Marion West
MN0249	Prehistoric and Historic	Marion	Marion West
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MN0250	Prehistoric	Marion	Marion West
MN0256	Prehistoric	Marion	Morral
MN0257	Prehistoric and Historic	Marion	Morral
MN0259		Marion	Morral
MN0260	Prehistoric and Historic	Marion	Morral
MN0263	Prehistoric and Historic	Marion	Morral
MN0264	Prehistoric	Marion	Morral
MN0265	Prehistoric and Historic	Marion	Morral
MN0266	Prehistoric	Marion	Morral
MN0267	Historic	Marion	Morral
MN0268	Prehistoric	Marion	Morral

## **List of OHI Listed Structural Resources**

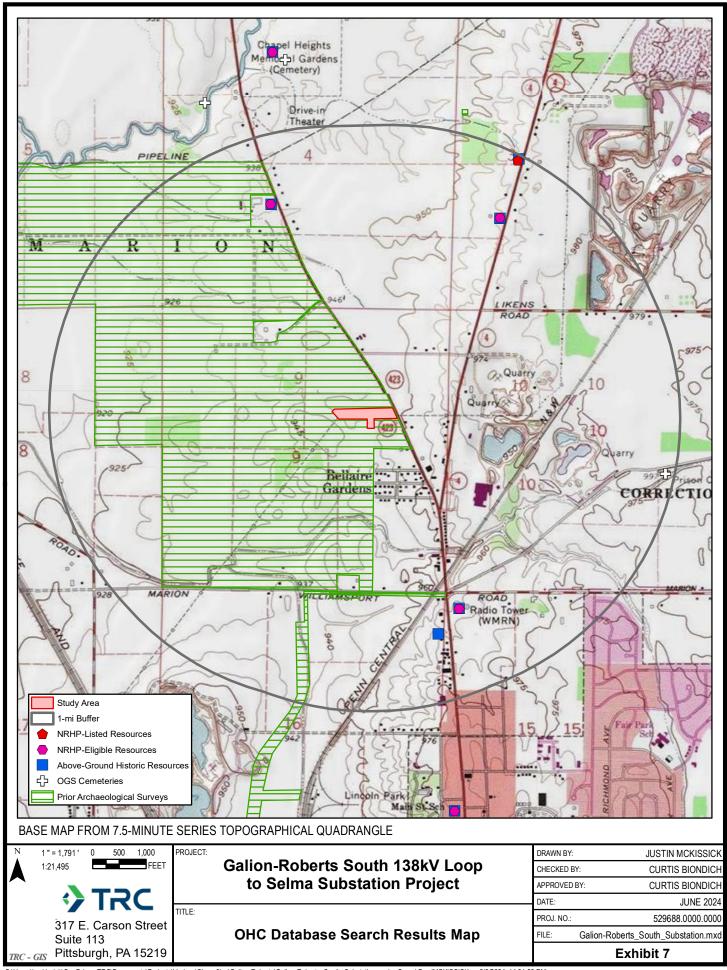
OHI Number	Present Name	Historical Use	County	Municipality
MAR0003709	Dr Kantzer House	Single Dwelling	Marion	Marion
MAR0034609	Marion Township Dist. #8 School	One Room Schoolhouse	Marion	Marion (Township of)
MAR0034709	Residence	Single Dwelling	Marion	Marion (Township of)
MAR0037409	Residence	Single Dwelling	Marion	Marion (Township of)
MAR0050909	WMRN Radio	OTHER USE	Marion	Marion
	Broadcasting Building			

**List of OGS Cemetery Inventory** 

OGS ID	Name	County	Municipality
15582	MARION	Marion	Marion
	CORRECTIONAL		
	INSTITUTION-(PR	ISON)	

**List of Previous Cultural & Historic Resource Surveys** 

YEAR	Title	COUNTY	Municipality
1998	Phase I Literature Review and Reconnaissance Survey for the Proposed Marion Dual Rail Industrial Park Access Road and Improvements To Marion- Williamsport Road, Marion Township, Marion County, Ohio	Marion	Marion Township
2003	Phase II Evaluative Testing for MAR-Dual Road Rail Industrial Park, of 33-MN-80, to be Impacted by the Proposed Improvements to Marion-Williamsport Road, Marion Township, Marion County, Ohio	Marion	Marion Township
2021	Phase I Archaeology Survey for the Marion County Solar Project, Marion Township, Marion County, Ohio	Marion	Marion Township





## 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, Ohio 43229
Phone: (614) 265-6661

Fax: (614) 267-4764

June 20, 2024

Erin Van Nort TRC Companies, Inc. 1382 West 9th Street, Suite 400 Cleveland, Ohio 44113

Re: 24-0783 #529688 FirstEnergy Galion-Roberts South

**Project:** The proposed project involves the installation of a loop connection between the Galion-Roberts South 138kV transmission line and the proposed Selma Substation.

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

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

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

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

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

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

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure

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

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

This project is within the range of the following listed mussel species.

Federally Endangered

clubshell (*Pleurobema clava*) rayed bean (*Villosa fabalis*) snuffbox (*Epioblasma triquetra*)

#### Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

#### State Threatened

pondhorn (*Uniomerus tetralasmus*)

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

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 aquatic 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, the 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.

Thank you for affording us the opportunity to comment.

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

The <u>local floodplain administrator</u> 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 <a href="mike.pettegrew@dnr.ohio.gov">mike.pettegrew@dnr.ohio.gov</a> 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



June 3, 2024

Project Code: 2024-0089041

#### Dear Erin Van Nort:

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).

<u>Federally Threatened and Endangered Species</u>: 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 <a href="mailto:ohio@fws.gov">ohio@fws.gov</a>.

Sincerely,

Erin Knoll

Field Office Supervisor

Exhibit 10

From: <u>Eileen.Wyza@dnr.ohio.gov</u>

To: Molnar, Maggie

Cc: Falkinburg, Brad; Slabe, Jenna

Subject: [EXTERNAL] RE: Desktop Hibernacula Assessment: FirstEnergy"s Galion-Roberts South 138kV Loop to Selma Substation

Project (24-0783\_#529688)

**Date:** Tuesday, July 2, 2024 1:27:08 PM

Attachments: image001.png image004.png

image005.png image006.png image007.png image008.png image002.png

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

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

Hi Maggie,

Per review of the desktop survey provided for the Galion-Roberts South 138kV Loop to Selma Substation Project, the Ohio Division of Wildlife concurs with your assessment that no caves, cliffs, or mine openings occur in the project area. Therefore, the project is not likely to impact hibernating bats.

Should any reported conditions change before or during construction, please contact me for additional guidance.

Thank you,

Eileen Wyza, Ph.D.

(she/her/hers) Wildlife Biologist Ohio Division of Wildlife Phone: 614-265-6764

Email: Eileen.Wyza@dnr.ohio.gov

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Please consider the environment before printing this email.

From: Molnar, Maggie < MMolnar@trccompanies.com>

Sent: Friday, June 28, 2024 2:26 PM

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

Cc: Falkinburg, Brad <BFalkinburg@trccompanies.com>; Slabe, Jenna <JSlabe@trccompanies.com> Subject: Desktop Hibernacula Assessment: FirstEnergy's Galion-Roberts South 138kV Loop to Selma

Substation Project (24-0783\_#529688)

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 Galion-Roberts South 138kV Loop to Selma Substation Project located in Marion Township, Marion County, Ohio.

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

Thank you,

Maggie Molnar, PWS

**Ecologist** 



781 Science Boulevard, Suite 200, Gahanna, Ohio 43230

D 614.423.6342 C 614.949.2437

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 <a href="mailto:csc@ohio.gov">csc@ohio.gov</a> or click the Phish Alert Button if available.



1382 West Ninth St. Suite 400 Cleveland, OH 44113 T 216.344.3072 TRCcompanies.com

May 20, 2024

Mr. Auggie Ruggiero FirstEnergy Corporation 341 White Pond Drive Akron, OH 44320

Reference: Technical Memorandum for the Surface Water Delineation of the Galion-Roberts South

138kV Loop to Selma Substation Project located in Marion Township, Marion County,

Ohio.

(TRC Project No. 529688.0000.0000)

Dear Mr. Ruggiero:

On behalf of FirstEnergy Corporation, TRC Companies, Inc. (TRC) conducted a surface water delineation for the Galion-Roberts South 138kV Loop to Selma Substation Project (Project). The Project is in Marion Township, Marion County, Ohio and is approximately 5.45-acres in size (**Attachment A, Figure 1 and 2**). The Project Study Area is located at the following approximate centroid coordinates: 40.623952, -83.134985. This Project involves the installation of a loop connection between the Galion-Roberts South 138kV transmission line and the proposed Selma Substation.

The delineation was conducted by qualified wetland scientists on May 1, 2023, in accordance with the United States Army Corps of Engineers (USACE) parameters. The objective was to evaluate and delineate potential surface water resources within the Project Study Area, such that the resources could be considered during each phase of the Project. Prior to the site visit, TRC reviewed available secondary source information such as the National Wetlands Inventory (NWI), National Hydrography Dataset (NHD), United States Geological Survey (USGS) topographic maps, County Soil Survey maps, and aerial imagery of the Project Study Area to use in addition to field investigations.

The Project Study Area is shown on the attached map (Attachment A, Figure 1), which was derived from the USGS Marion West, Ohio 7.5-minute quadrangle topographic map. The proposed Project Study Area does not include any mapped NHD or NWI features (Attachment A, Figure 4). According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel, 39101C0210E (eff. 12/21/2023) the proposed Project is not located within a FEMA mapped 100-Year Flood Zone. During the field investigation, land use within the Project Study Area was observed to be an existing agricultural field surrounded by agricultural land. See attached mapping in Attachment A and the Photographic Record in Attachment B for further details of the Project Study Area.

During the field investigation, no wetlands or surface waters were delineated or identified within the Project Study Area. To verify the absence of wetlands within the Project Study Area an upland data point (U-EVN-1) was collected and is shown on **Figure 5** in **Attachment A.** Data for U-EVN-1 was recorded on the USACE Wetland Determination Data Form – Midwest Region. The Wetland Determination Data Form is provided in **Attachment C.** 

This Technical Memorandum represents the conditions within the Project Study Area identified herein, as of the inspection dates. Should you require any additional information or have any questions concerning this letter, please feel free to contact me at (440) 666-2890 or by email at <a href="mailto:BFalkinburg@TRCCompanies.com">BFalkinburg@TRCCompanies.com</a>.

# Galion-Roberts South 138kV Loop to Selma Substation Project Surface Water Delineation – Technical Memorandum



Kind Regards,

Brown Falkily

Brad M. Falkinburg, PWS Ecological Office Practice Leader

cc: Maggie Molnar, PWS - TRC

**Attachments** 

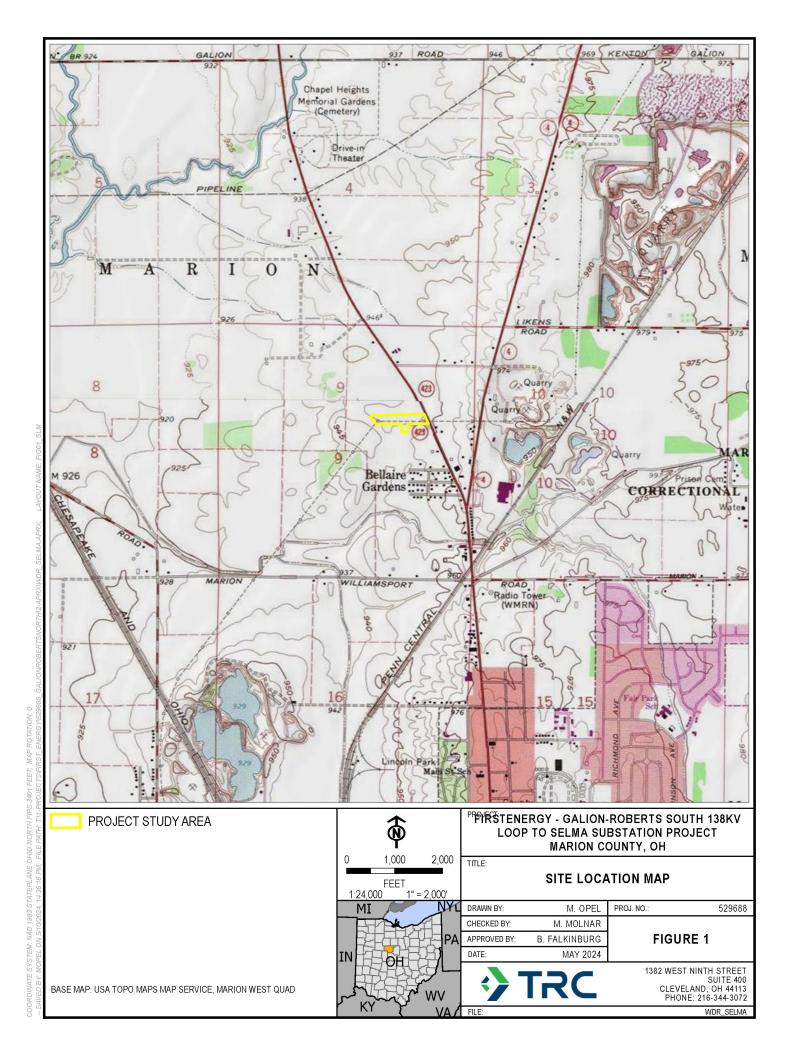
Attachment A: Figures

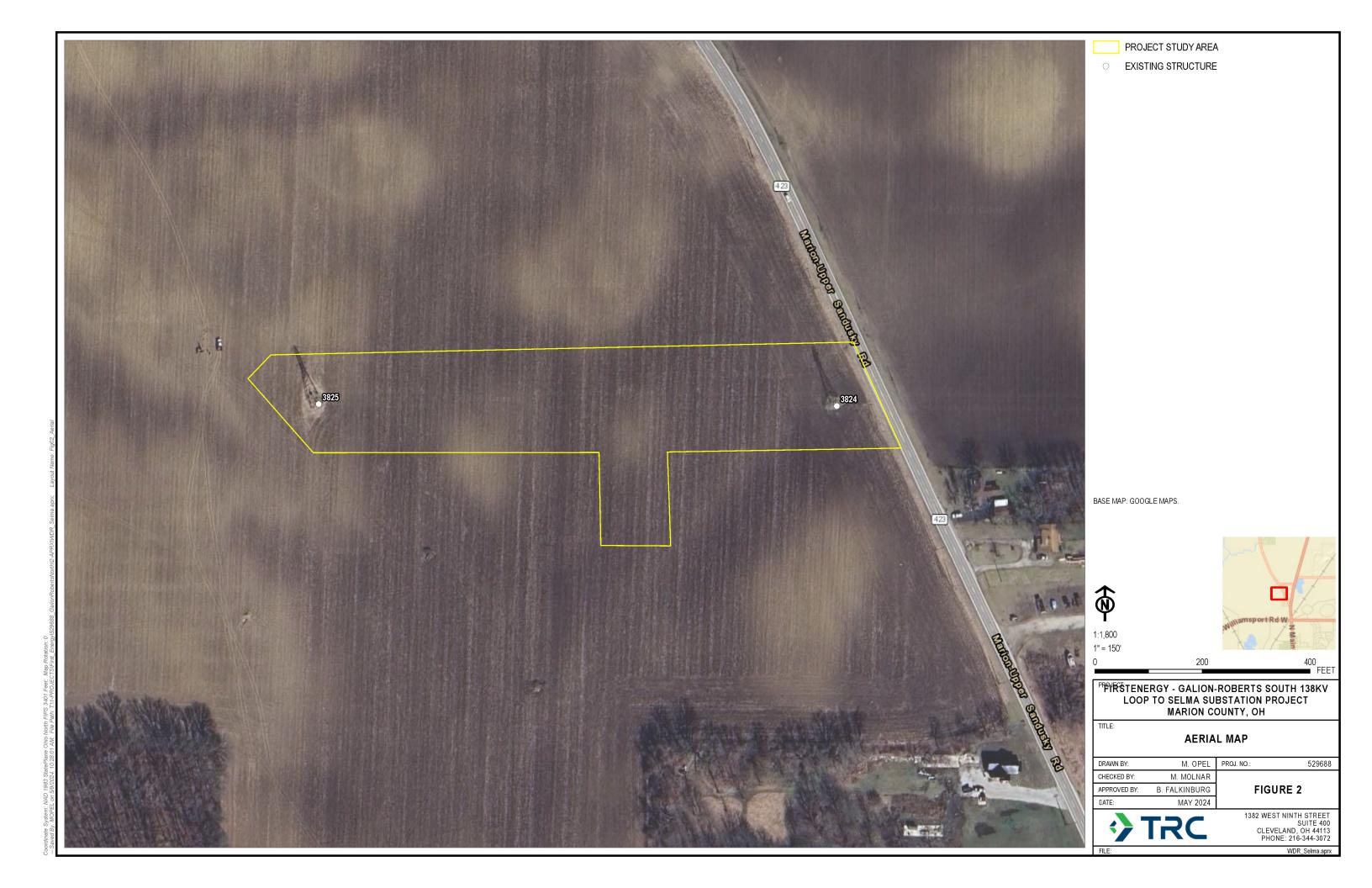
Attachment B: Photographic Record

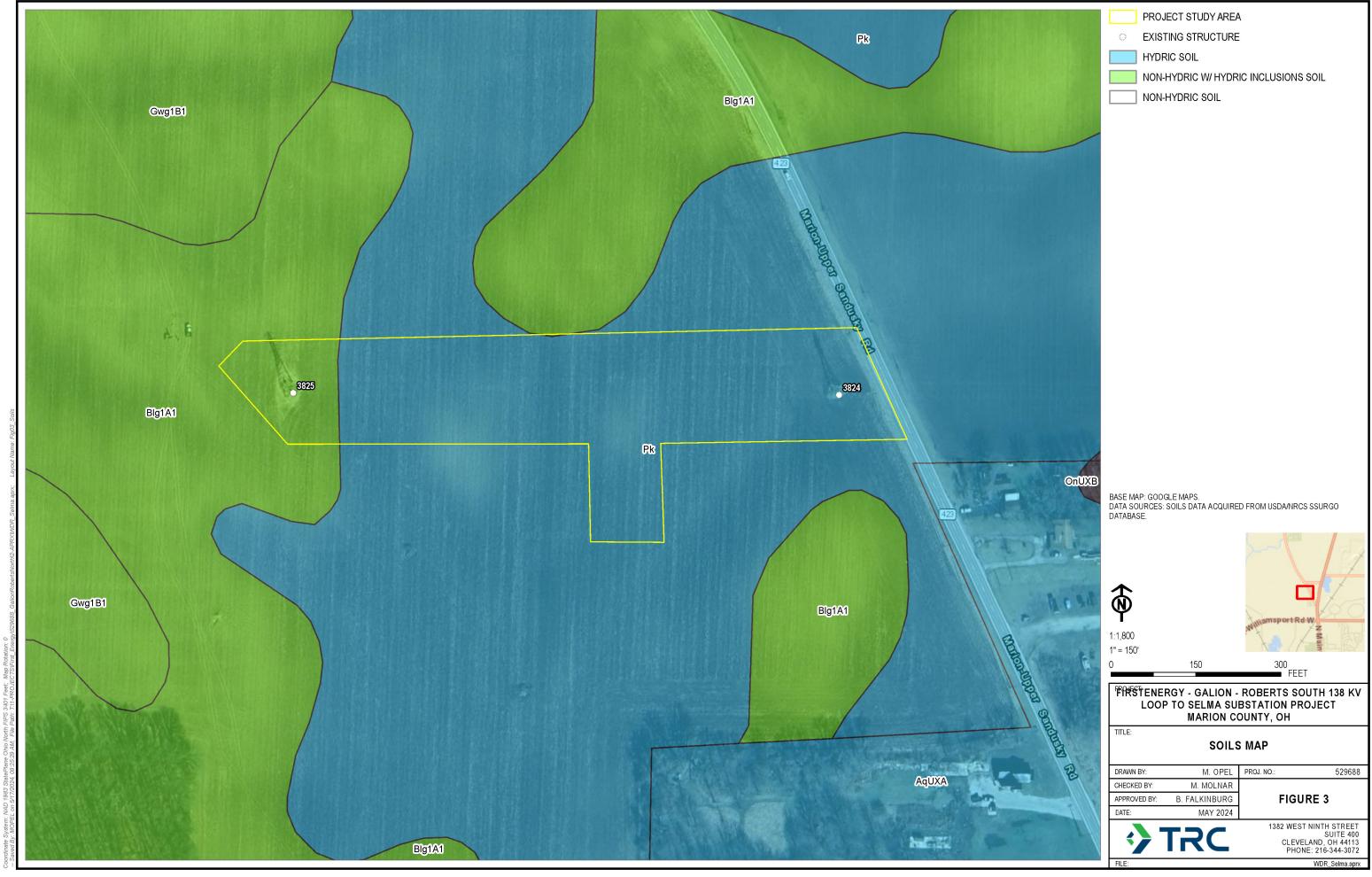
Attachment C: Data Sheet

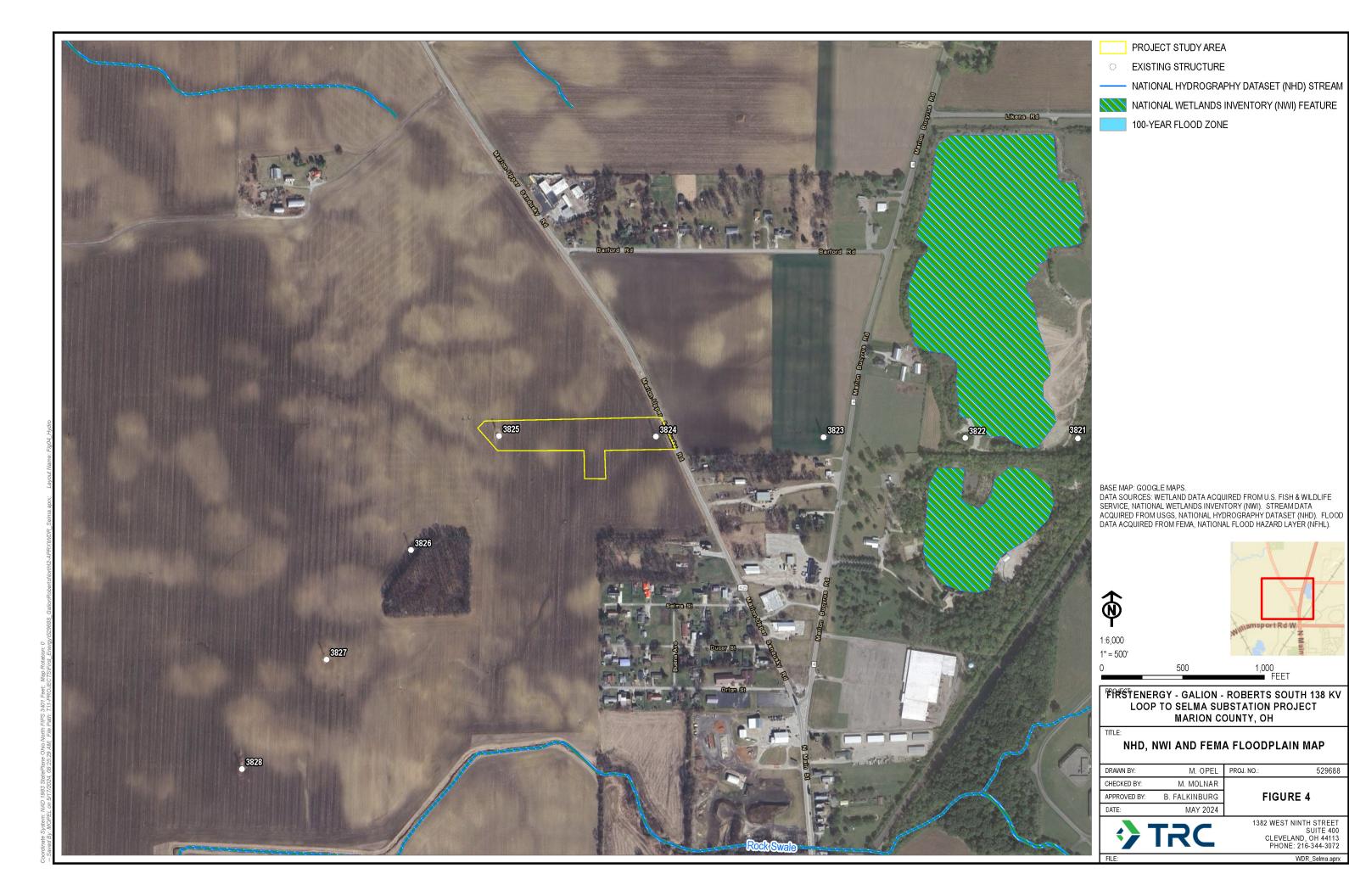


# **ATTACHMENT A – Figures**



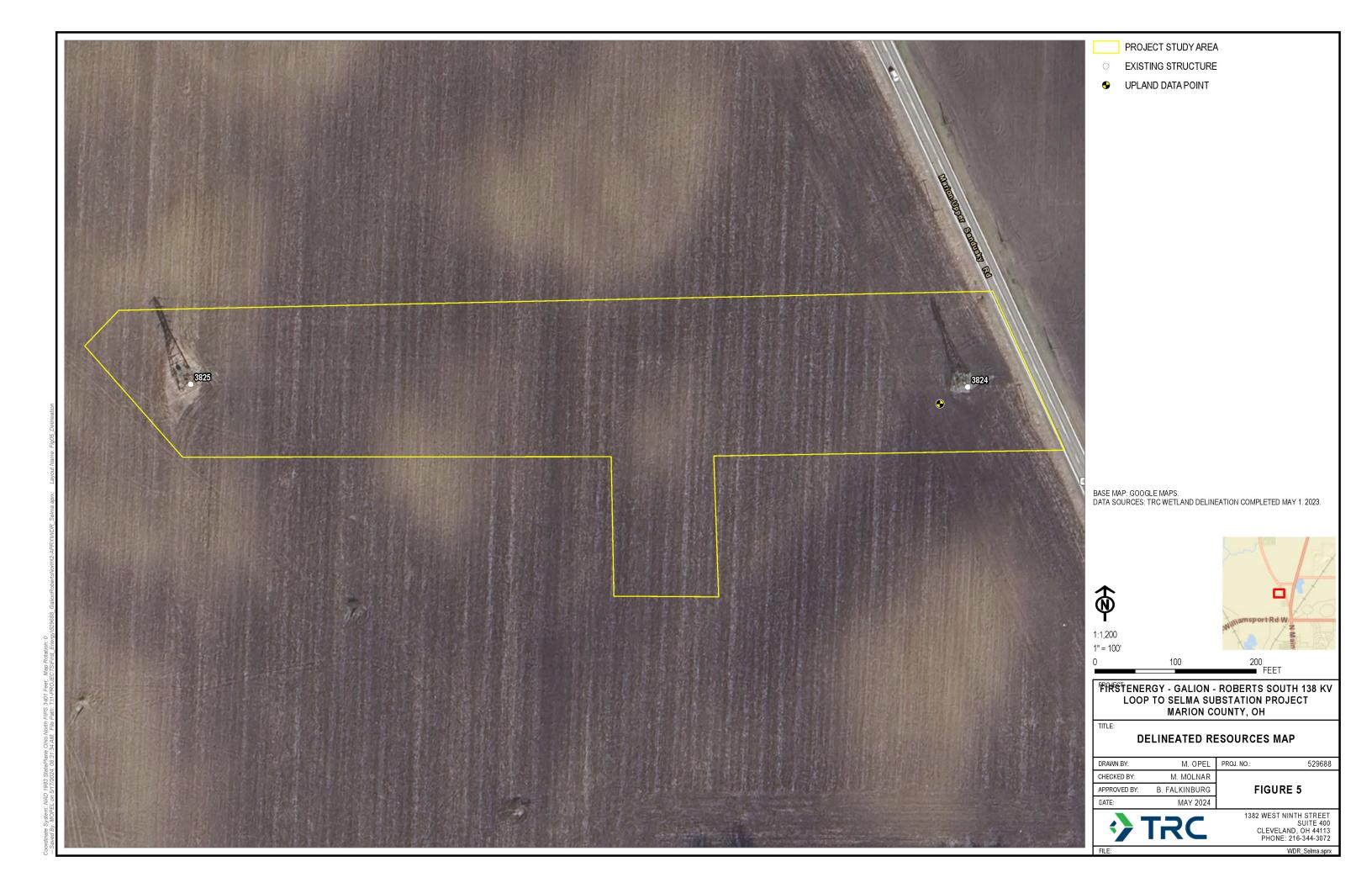






529688

WDR Selma.aprx





# **ATTACHMENT B – Photographic Record**



## PHOTOGRAPHIC RECORD

Galion-Roberts South 138 kV Loop to Selma Substation Project

Client Name:

Site Location:

Project No.

FirstEnergy

Marion Township, Marion County, Ohio

529688.0000.0000

## Photo No. 1.

Photo Date: 5/1/2023

## Description:

Photo within upland, agricultural field (existing right-of-way), facing north.



## Photo No. 2.

Photo Date: 5/1/2023

## **Description:**

Photo within upland, agricultural field (existing right-of-way), facing east.





## PHOTOGRAPHIC RECORD

Galion-Roberts South 138 kV Loop to Selma Substation Project

Client Name:

Site Location:

Project No.

FirstEnergy

Marion Township, Marion County, Ohio

529688.0000.0000

## Photo No. 3.

Photo Date: 5/1/2023

## Description:

Photo within upland, agricultural field (existing right-of-way), facing south.



## Photo No. 4.

Photo Date: 5/1/2023

## Description:

Photo within upland, agricultural field (existing right-ofway), facing west.





## **ATTACHMENT C – Data Sheet**

## WETLAND DETERMINATION DATA FORM - Midwest Region

Project/Site: Galion-Roberts South 138kV Loop to Selma	Substa City/	County: Marion Tw	p/ Marion Sampling Date: 2023-5-1
Applicant/Owner: FirstEnergy		State: (	
Investigator(s): Erin Van Nort, Will Smith Jr, Michael Whi	tacre		Section, Township, Range: 09 5S 15E
Landform (hillslope, terrace, etc): Flat		Local relief (con	ncave, convex, none): None
Slope (%): <u>0 to 1</u> Lat: <u>40.6239311091</u>		Long: <u>-83.13509</u>	68605 Datum: WGS84
Soil Map Unit Name: Pewamo silty clay loam, 0 to 1 perce			NWI Classification: None
Are climatic / hydrologic conditions on the site typical for this ti			
Are Vegetation X , Soil , or Hydrology sig			"Normal Circumstances" present? Yes No
Are Vegetation, Soil, or Hydrology nat			eeded, explain any answers in Remarks.)
SUMMARY OF FINDINGS — Attach site map sh		mpling point loc	cations, transects, important features, etc.
Hydrophytic Vegetation Present? Yes No X		Is the Sampled A	urea
Hydric Soil Present?  Wetland Hydrology Present?  Yes  No  No  X	<del></del>	within a Wetland	
Remarks:  Covertype is UPL. Based on the absence of all three parameter	e this area is	an unland Circumstanc	res are not normal due to agricultural activities
Covertype is OFL. Dased on the absence of an three parameter	5, 11115 atea 15	an upianu. Circumstanc	es are not normal due to agricultural activities.
<b>VEGETATION</b> — Use scientific names of plants			
20.6		Dominant Indicator	Dominance Test worksheet:
Tree Stratum (Plot size: 30 ft radius )	% Cover	Species? Status	Number of Dominant Species
1. 2.		<del></del>	That Are OBL, FACW, or FAC: $0$ (A)
			Total Number of Dominant
4.			Species Across All Strata: $\underline{1}$ (B)
5.			Percent of Dominant Species
	0	= Total Cover	That Are OBL, FACW, or FAC: 0% (A/B)
Sapling/Shrub Stratum (Plot size: 15 ft radius )			Prevalence Index worksheet:
1.			Total % Cover of: Multiply by:
2			OBL species $0 \times 1 = 0$
3			FACW species 0 x 2 = 0
4			FAC species $0 \times 3 = 0$
5			FACU species 0 x 4 = 0
	0	= Total Cover	UPL species 100 x 5 = 500
Herb Stratum (Plot size: 5 ft radius )	100		
1. Zea mays	100	Yes UPL	Column Totals:100 (A)500 (B)
2.	· · ·	<del></del>	Prevalence Index = B/A = _5
4.	· · · · · · · · · · · · · · · · · · ·		Frevalence index – D/A –
5.			Hydrophytic Vegetation Indicators:
6.			1 - Rapid Test for Hydrophytic Vegetation
7.			2 - Dominance Test is >50%
8.			3 - Prevalence Index is ≤3.0 <sup>1</sup>
9			4 - Morphological Adaptations <sup>1</sup> (Provide supporting
10			data in Remarks or on a separate sheet)
	100	= Total Cover	Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
Woody Vine Stratum (Plot size: 30 ft radius )			
1	·		<sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2			be present, unless disturbed of problematic.
	0	= Total Cover	Hydrophytic
			Vegetation
			Present? Yes No _X
Remarks:			
The criterion for hydrophytic vegetation is not met.			

SOIL Sampling Point: U-EVN-01

Depth	cription: (Describe t Matrix			x Feature				
inches)	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks
0 to 12	10YR 5/2	100					Clay Loam	
12 to 20	10Y 4/1	80	7.5YR 5/6	20	D	M	Clay Loam	
	<u> </u>							
•	ncentration, D=Deple	tion, RM=	Reduced Matrix, C	S=Cover	ed or Co	ated Sa		<sup>2</sup> Location: PL=Pore Lining, M=Matrix.
Histosol ( Histic Epi Black His Hydroger Stratified 2 cm Muc Depleted Thick Dar Sandy Mu	A1) pedon (A2) tic (A3) n Sulfide (A4) Layers (A5)	(A11)	Sandy Gle Sandy Rec Stripped M Loamy Mu Loamy Gle Depleted N Redox Dar Depleted E	dox (S5) latrix (S6) cky Mine eyed Matr Matrix (F3 k Surface	) ral (F1) rix (F2) 8) e (F6) ace (F7)		- - - -	dicators for Problematic Hydric Soils <sup>3</sup> :  Coast Prairie Redox (A16)  Dark Surface (S7)  Iron-Manganese Masses (F12)  Very Shallow Dark Surface (TF12)  Other (Explain in Remarks)  Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
strictive L Type: Depth (inc	_ayer (if present):							hudvia Cail Duaganta Vas
emarks:	ion for hydric soil is no	t met.					<u> </u>	Hydric Soil Present? Yes No _ 🤻
marks: The criter	ion for hydric soil is no	t met.					<b>'</b>	nyuric soil Present? res No
marks: The criteri	ion for hydric soil is no	t met.					P	nyunc son Present? res No
marks: The criterion	ion for hydric soil is no		'ed; check all that a	pply)				Secondary Indicators (minimum of two requi
DROLO etland Hydimary Indic Surface N	GY drology Indicators: eators (minimum of or		Water-Stain	ed Leave	` ,			Secondary Indicators (minimum of two requi
DROLO etland Hyd mary Indic Surface V High Wat	GY drology Indicators: eators (minimum of or Water (A1) er Table (A2)		Water-Stain Aquatic Fau	ed Leave Ina (B13)	, ,			Secondary Indicators (minimum of two requ Surface Soil Cracks (B6) Drainage Patterns (B10)
DROLO etland Hyd mary Indic Surface V High Wat Saturatio	GY  drology Indicators: eators (minimum of or Water (A1) er Table (A2) n (A3)		Water-Stain Aquatic Fau True Aquati	ned Leave Ina (B13) c Plants (	(B14)			Secondary Indicators (minimum of two requ Surface Soil Cracks (B6) Drainage Patterns (B10) Dry-Season Water Table (C2)
DROLO etland Hydimary Indic Surface V High Wat Saturatio Water Ma	GY  drology Indicators: eators (minimum of or Water (A1) er Table (A2) n (A3)		Water-Stain Aquatic Fau True Aquati Hydrogen S	ned Leave Ina (B13) c Plants ( Sulfide Oc	(B14) dor (C1)	Living I		Secondary Indicators (minimum of two requ Surface Soil Cracks (B6) Drainage Patterns (B10) Dry-Season Water Table (C2) Crayfish Burrows (C8)
DROLO etland Hydimary Indic Surface V High Wat Saturatio Water Ma	GY drology Indicators: eators (minimum of or Water (A1) eer Table (A2) n (A3) arks (B1) t Deposits (B2)		Water-Stain Aquatic Fau True Aquati	ned Leave Ina (B13) c Plants ( Gulfide Oc nizosphei	(B14) dor (C1) res along			Secondary Indicators (minimum of two requ Surface Soil Cracks (B6) Drainage Patterns (B10) Dry-Season Water Table (C2) Crayfish Burrows (C8)
The criterion  Surface Valuation  Figure 1  Saturation  Water Mater Mate	GY drology Indicators: eators (minimum of or Water (A1) eer Table (A2) n (A3) arks (B1) t Deposits (B2) osits (B3) er Crust (B4)		Water-Stain Aquatic Fau True Aquati Hydrogen S Oxidized RI Presence o	ned Leave Ina (B13) c Plants ( Gulfide Oc nizosphei f Reduce I Reductio	(B14) dor (C1) res along d Iron (C on in Tille	4)	Roots (C3)	Secondary Indicators (minimum of two requ Surface Soil Cracks (B6) Drainage Patterns (B10) Dry-Season Water Table (C2) Crayfish Burrows (C8) Saturation Visible on Aerial Imagery (C9 Stunted or Stressed Plants (D1) Geomorphic Position (D2)
DROLO etland Hyd mary Indic Surface V High Wat Saturatio Water Ma Sediment Drift Depo	GY drology Indicators: eators (minimum of or Water (A1) er Table (A2) en (A3) arks (B1) t Deposits (B2) osits (B3) er Crust (B4) osits (B5)	ne is requii	Water-Stain Aquatic Fau True Aquatic Hydrogen S Oxidized RI Presence o Recent Iron Thin Muck S	ned Leave Ina (B13) c Plants ( Gulfide Oc nizospher f Reduce I Reductio Surface (	(B14) dor (C1) res along d Iron (C on in Tille C7)	4)	Roots (C3)	Secondary Indicators (minimum of two requ Surface Soil Cracks (B6) Drainage Patterns (B10) Dry-Season Water Table (C2) Crayfish Burrows (C8) Saturation Visible on Aerial Imagery (C9 Stunted or Stressed Plants (D1)
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