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January 21, 2008

Mr. Paul Centolella, Commissioner
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, Ohio 43215

Dear Paul:

I recently wrote to you stating my objection to the American Transmission Systems, Inc. Geauga County - 138KV Transmission Line Supply Project (Case No. 07-171-131-BTX). Since then, I have had the opportunity to meet with a representative of First Energy, Mark Fowler. In that meeting, it could not be explained to me why the Preferred Route of this transmission line has been chosen as such.

The Preferred Route is not a straight line and has a significantly higher environmental impact. After reading information on the Ohio Power Sitting Board website, I have found the following from the Wetland Delineation Reports provided.

Preferred Route

Alternate Route

100	Number of Different Wetlands	30
55	Acres of Wetlands	14
11	Effected Habitat Types	9
23	Category I Wetlands	9
77	Category II Wetlands	20
0	Category III Wetlands	1
58	Number of Streams Identified	26
6	Number with Drainage Basis Greater than 1 mile	7

Basically every category above is lower for the Alternate Route, but yet the Preferred Route has been chosen? I have attached the executive summary of the reports for your review.

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Also, the Alternate Route is a straight line that follows an existing street, which as explained to me is less expensive to construct. The Preferred Route zig zags thru the pristine wooded environment of many property owners. So again, I do not understand why the Preferred Route has been chosen.

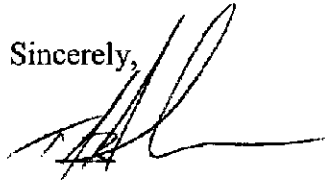
As indicated above, if there is a lower environmental impact and a lower cost to construct, why would First Energy not use the existing pathway, the Alternate Route, the route that is already paved, cleared and prepped for a transmission line?

As this project moves forward and public concern is raised, please keep the above in mind. I believe it to be very important to have these questions answered before this moves forward any further.

I understand power must be provided, but in this case, I do not understand why it must make such an environmental disturbance.

I would appreciate any answers you may be able to help obtain.

Sincerely,

A handwritten signature in black ink, appearing to read 'T.J. Asher', with a long horizontal flourish extending to the right.

T.J. Asher

TJA/kgc
Enclosure

APPENDIX 07-1

**Wetland Delineation, Stream Assessment, and Threatened and Endangered
Species Habitat Survey, Preferred Route Geauga County 138 kV Electric
Transmission Line, Geauga County, Ohio**

CONTENTS

SECTION	PAGE
EXECUTIVE SUMMARY	iii
1.0 INTRODUCTION	7
2.0 METHODS	1
3.0 RESULTS	2
3.1 U.S. ARMY CORPS OF ENGINEERS WETLAND DELINEATION PROCEDURE	2
3.1.1 Preliminary Soils Evaluation	3
3.1.2 National Wetland Inventory (NWI) Map Review	15
3.1.3 Delineated Wetlands	17
3.1.4 Wetland Habitat Description	18
3.1.5 U.S. Army Corps of Engineers Section 404 Requirements	22
3.2 OEPA ORAM V5.0 WETLAND EVALUATION	22
3.3 STREAM EVALUATIONS	23
3.4 NON-JURISDICTIONAL ROADSIDE DITCHES	25
3.5 THREATENED AND ENDANGERED SPECIES HABITAT SURVEY	25
3.5.1 Plants	26
3.5.2 Aquatic species	26
3.5.3 Amphibians	27
3.5.4 Reptiles	27
3.5.5 Birds	27
3.5.6 Mammals	27
3.5.7 Insects	28
4.0 SUMMARY	28
5.0 REFERENCES	29

TABLES (follows text)

Number

- 1 ANIMAL SPECIES IDENTIFIED OR LIKELY TO OCCUR IN THE STUDY AREA
- 2 MAJOR PLANT SPECIES OBSERVED OR EXPECTED TO OCCUR IN THE STUDY AREA
- 3 DETAILED WETLAND DESCRIPTIONS

CONTENTS

(Continued)

FIGURES

(follow tables)

Number

- 1A-C ROUTE VICINITY MAP
- 2A-C NATIONAL WETLAND INVENTORY MAP
- 3A-C OHIO WETLAND INVENTORY MAP
- 4A-Y WETLAND DELINEATION AND STREAM ASSESSMENT MAP
- 5A-C SOILS MAP

APPENDICES

(follow figures)

Appendix

- A U.S. ARMY CORPS OF ENGINEERS WETLAND DELINEATION FORMS
- B OHIO EPA OHIO RAPID ASSESSMENT METHOD (ORAM) FOR WETLANDS V5.0 FORMS AND GRAPH
- C OHIO EPA QUALITATIVE HABITAT EVALUATION INDEX (QHEI) FORMS AND TABLE
- D SELECTED PHOTOGRAPHS
- E AGENCY CORRESPONDENCE

EXECUTIVE SUMMARY

American Transmission Systems, Inc. (ATSI) and The Cleveland Electric Illuminating Company (CEI), subsidiaries of FirstEnergy Corp., are proposing construction of a 138 kV electric transmission line from a proposed distribution substation in Huntsburg Township along US Route 322 in Geauga County, Ohio to an existing 138 kV transmission line located along the border of Geauga and Lake Counties in northeast Ohio. This jurisdictional wetland delineation, stream assessment, and threatened and endangered species survey was conducted along the 14.71-mile long, 200-foot wide corridor for the Preferred Route, and an approximately one-acre proposed distribution substation located in Geauga County, Ohio. Delineation and assessment work was conducted in May, June, July, and August 2007. A separate report has been prepared for the proposed alternate route corridor.

One hundred wetlands, totaling 55.1 acres, of 11 different wetland habitat types were identified along the corridor, including 18 palustrine emergent wetlands, four palustrine emergent/forested wetlands, 15 palustrine emergent/scrub-shrub wetlands, two palustrine emergent/scrub-shrub/forested wetlands, 15 palustrine forested wetlands, three palustrine forested/emergent wetlands, ten palustrine forested/scrub-shrub wetlands, three pond natural vernal-woodland wetlands, 13 palustrine scrub-shrub wetlands, 12 palustrine scrub-shrub/emergent wetlands, and five palustrine scrub-shrub/forested wetlands (Cowardin et al. 1979, Heber 2007). These wetlands are summarized in Table ES-1.

Identified wetlands were evaluated utilizing the Ohio Rapid Assessment Method (ORAM) v5.0 for categorizing wetlands. Wetland ORAM scores indicated the following: 23 Category I wetlands and 77 Category II palustrine wetlands. All of the wetlands are considered non-isolated and jurisdictional. No Category III wetlands were identified during the field investigations.

Fifty-eight streams were identified, six with a drainage basin area greater than one square mile, and 52 streams with a drainage basin area less than one square mile. The streams with a drainage basin greater than one square mile were scored using qualitative habitat evaluations (QHEI). Using the QHEI method, the survey rated one "fair" warmwater habitat stream and five "good" warmwater habitat streams. There were eight ephemeral streams, four intermittent streams, and 40 perennial streams identified with a drainage basin less than one square mile. These streams are summarized in Tables ES-2 and ES-3.

The USFWS literature review indicated that the proposed project is located within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the once threatened Bald eagle (*Haliaeetus leucocephalus*). No species of concern were identified during field investigations. However, potential habitat for the Indiana bat was identified during the field investigation.

TABLE ES-1

EXECUTIVE SUMMARY TABLE OF WETLANDS LOCATED IN THE GEAUGA COUNTY
PREFERRED ROUTE ELECTRIC TRANSMISSION LINE CORRIDOR

Wetland ID	Wetland Type	Area (Acres)	Area (Hectares)	Area (M ²)	Area (M ²)	Area (M ²)
Pr-w001	PSS	0.0	16	1	0	0.0
Pr-w002	PEM/PSS	0.1	31	2	39	0.1
Pr-w003	PEM/PSS	0.3	31	2	54	0.1
Pr-w004	PEM/PSS/PFO	1.0	54	2	251	0.3
Pr-w005	PEM	0.0	28	1	0	0.0
Pr-w006	PEM	0.0	10	1	0	0.0
Pr-w007	PEM/PSS	0.4	52	2	116	0.2
Pr-w008	PFO	0.0	27	1	0	0.0
Pr-w009	PSS	0.0	24	1	0	0.0
Pr-w010	PSS	0.0	22	1	0	0.0
Pr-w011	PEM/PSS	0.3	51	2	88	0.1
Pr-w012	PEM/PSS	0.4	51	2	98	0.1
Pr-w013	PSS/PEM	0.1	38.5	2	0	0.0
Pr-w014	PEM	0.0	31	2	0	0.0
Pr-w015	PEM/PFO	0.0	45	2	0	0.0
Pr-w016	PSS/PEM	0.0	44.5	2	8	0.0
Pr-w017	PSS/PEM	0.0	44.5	2	0	0.0
Pr-w018	PEM/PSS	0.1	36.5	2	0	0.0
Pr-w019	PSS/PEM	0.2	33.5	2	101	0.1
Pr-w020	PSS/PFO	0.1	39.5	2	0	0.0
Pr-w021	PSS/PSO	0.2	39.5	2	36	0.1
Pr-w022	PSS/PFO	0.4	39.5	2	112	0.2
Pr-w023	PSS	0.3	34.5	2	94	0.1
Pr-w024	PFO/PSS	0.4	45.5	2	101	0.1
Pr-w025	PFO/PSS	1.3	45.5	2	108	0.2
Pr-w026	PFO	0.3	52	2	0	0.0
Pr-w027	PEM	0.1	20	1	0	0.0
Pr-w028	PFO	0.9	41	2	170	0.2
Pr-w029	PFO	1.2	39.5	2	313	0.4
Pr-w030	PEM/PSS	2.6	39.5	2	564	0.8
Pr-w031	PSS/PEM	0.4	38	2	84	0.1
Pr-w032	PEM/PFO	1.1	44	2	332	0.5
Pr-w033	PD1m	0.1	47	2	4	0.0
Pr-w034	PEM/PSS	1.5	54	2	422	0.6
Pr-w035	PSS/PFO	2.1	55	2	583	0.8

numerous tree cavities or hollow portions of tree boles and limbs, a generally open subcanopy, and close proximity to several mapped streams.

There are several areas along the study corridor not suitable as habitats for Indiana bats due to either no forest cover or a thick subcanopy. Specific Indiana Bat surveys were not performed during the field reconnaissance.

Snoeshoe hare (*Lepus americanus*): The snowshoe hare is considered to be a state endangered species. ODNR-DOW has asked that the snowshoe hare biologist from the DOW be contacted if scrub/shrub or forested wetland habitat or scrub/shrub field habitat is located in the project area.

3.5.7 Insects

ODNR-DNAP had no previous records of threatened or endangered insects within 1,000 feet of the project centerline.

4.0 SUMMARY

One hundred wetlands, totaling 55.1 acres, of 12 different Cowardin wetland types were identified within the project study area. Identified wetlands were evaluated utilizing ORAM v5.0 qualitative evaluation method for categorizing wetlands. The ORAM scores for the wetlands indicated that 23 wetlands are Category I, and 77 wetlands are classified as Category II wetlands. All of the wetlands are considered non-isolated and jurisdictional.

Fifty-eight streams were identified along the project corridor, six with a drainage basin greater than one square mile, and 52 with a drainage basin less than one square mile. Streams with a drainage basin greater than one square mile were assessed using the QHEI methodology, resulting in one fair warmwater habitat stream and five good warmwater habitat stream. There were eight ephemeral streams, four intermittent streams, and 40 perennial streams identified with a drainage basin less than one square mile.

**Addendum Wetland Delineation, Stream Assessment, and Threatened and
Endangered Species Habitat Survey, Alternate Route Geauga County 138 kV
Electric Transmission Line, Geauga County, Ohio**

CONTENTS

SECTION	PAGE
EXECUTIVE SUMMARY	i
1.0 INTRODUCTION.....	1
2.0 METHODS	1
3.0 RESULTS	2
3.1 U.S. ARMY CORPS OF ENGINEERS WETLAND DELINEATION PROCEDURE.....	2
3.1.1 Preliminary Soils Evaluation	2
3.1.2 National Wetland Inventory (NWI) Map Review	4
3.1.3 Ohio Wetland Inventory (OWI) Map Review	5
3.1.4 Delineated Wetlands.....	5
3.1.5 Wetland Habitat Description	5
3.1.6 U.S. Army Corps of Engineers Section 404 Requirements	8
3.2 OEPA ORAM V5.0 WETLAND EVALUATION.....	8
3.3 STREAM EVALUATIONS	9
3.4 NON-JURISDICTIONAL ROADSIDE DITCHES	11
3.5 THREATENED AND ENDANGERED SPECIES HABITAT SURVEY.....	11
3.5.1 Plants	12
3.5.2 Aquatic species	12
3.5.3 Amphibians.....	12
3.5.4 Reptiles	12
3.5.5 Birds	12
3.5.6 Mammals	13
3.5.7 Insects	13
4.0 SUMMARY	13
5.0 REFERENCES	15

FIGURES (follow text)

Number

- 1A - C ROUTE VICINITY MAP
- 2A - C NATIONAL WETLAND INVENTORY MAP
- 3A - C OHIO WETLAND INVENTORY MAP
- 4A - V WETLAND DELINEATION AND STREAM ASSESSMENT MAP
- 5A - C ALTERNATE ROUTE SOILS MAP

CONTENTS
(Continued)

APPENDICES
(follow figures)

Appendix

- A U.S. ARMY CORPS OF ENGINEERS WETLAND DELINEATION FORMS
- B OHIO EPA OHIO RAPID ASSESSMENT METHOD (ORAM) FOR WETLANDS V5.0 FORMS
AND GRAPH
- C OHIO EPA QUALITATIVE HABITAT EVALUATION INDEX (QHEI) FORMS AND TABLE
- D SELECTED PHOTOGRAPHS

EXECUTIVE SUMMARY

American Transmission Systems, Inc. (ATSI) and The Cleveland Electric Illuminating Company (CEI), subsidiaries of FirstEnergy Corp, are evaluating an Alternate Route for construction of a 138 kV electric transmission line from a proposed distribution substation in Huntsburg Township along the south side of Mayfield Road (US 322) to the existing Mayfield-Ashtabula 138 kV transmission line, approximately 12.05 miles to the north, in northern Geauga County, Ohio. A project vicinity map is provided as Figures 1A through C. The Alternate Route evaluated in this report follows Clay Street (TR 53) from its intersection with Mayfield Road until it reaches the existing Mayfield-Ashtabula 138 kV transmission line. This report is an addendum to the *Wetland Delineation, Stream Assessment, and Threatened and Endangered Species Habitat Survey, Preferred Route Geauga County 138 kV Electric Transmission Line, Geauga County, Ohio* (URS, 2007) (Preferred Route Report). Delineation and assessment work was conducted in April and May, 2007.

Thirty wetlands (30), totaling 14.35 acres, of nine different wetland habitat types were identified along the corridor, including palustrine emergent wetland, palustrine emergent/forested wetland, palustrine forested wetland, palustrine forested/scrub-shrub wetland, palustrine scrub-shrub wetland, palustrine scrub-shrub/emergent wetland, palustrine scrub-shrub/emergent/forested, palustrine scrub-shrub/forested wetland, and palustrine scrub-shrub/forested/emergent wetland. These wetlands are summarized in Table ES-4.

Identified wetlands were evaluated utilizing the Ohio Rapid Assessment Method (ORAM) v5.0 for categorizing wetlands. Wetland ORAM scores indicated the following: 9 Category I wetlands, 20 Category II wetlands, and 1 Category III wetland. All of the wetlands are considered non-isolated and jurisdictional.

Twenty-six streams (26) were identified, seven with a drainage basin area greater than one square mile, and 19 streams with a drainage basin area less than one square mile. The streams with a drainage basin greater than one square mile were scored using qualitative

habitat evaluations (QHEI). Using the QHEI method, the survey rated one "poor" warmwater habitat stream, four "good" warmwater habitat streams, and two "excellent" warmwater habitat streams. There were seven ephemeral streams, two perennial/ephemeral streams, and ten perennial streams identified with a drainage basin less than one square mile. These streams are summarized in Tables ES-5 and ES-6.

The US Fish and Wildlife Service (USFWS) literature review indicated that the proposed project is located within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the once threatened bald eagle (*Haliaeetus leucocephalus*). No species of concern were identified during field investigations. However, potential roosting and foraging habitat for the Indiana bat was identified during the field investigation.

TABLE ES-4
EXECUTIVE SUMMARY TABLE OF WETLANDS LOCATED IN THE
GEAUGA COUNTY ALTERNATE ROUTE ELECTRIC TRANSMISSION LINE
CORRIDOR

Wetland Identifier	Wetland Type	QHEI Score	QHEI Rating	QHEI Category	Area (Acres)	Area (Hectares)
Alt-w001	PEM/PFO	0.48	26	I	175	0.20
Alt-w002	PEM	0.09	12	I	102	0.08
Alt-w003	PFO/PSS	0.49	34	II	11	0.10
Alt-w004	PEM	0.53	16	I	0	0.01
Alt-w005	PEM	0.07	34	II	58	0.05
Alt-w006	PSS/PEM	0.49	16	I	305	0.29
Alt-w007	PSS	0.18	23	I	85	0.08
Alt-w008	PSS	0.11	26	I	0	0.02
Alt-w009	PFO	1.13	44	II	50	0.37
Alt-w010	PFO/PSS	1.02	50	II	0	0.12
Alt-w011	PSS/PFO	0.29	38	II	10	0.05
Alt-w012	PFO/PSS	0.15	52	II	0	0.04
Alt-w013	PSS/PFO/PEM	0.15	52	II	0	<0.01
Alt-w014	PSS/PFO	0.32	52	II	105	0.11
Alt-w015	PFO/PSS	1.36	55	II	539	0.49
Alt-w016	PSS	0.04	19	I	44	0.04
Alt-w017	PFO	0.66	38	II	78	0.17
Alt-w018	PSS	0.29	30	II	82	0.09
Alt-w019	PSS	0.26	57	II	83	0.08