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

LETTER OF NOTIFICATION

**GALION-LEASIDE AND GALION TO ONTARIO
SEGMENT OF GALION-LONGVIEW
138 kV TRANSMISSION LINE RECONDUCTORING
PROJECT**

OPSB CASE NO.: 13-1247-EL-BLN

May 31, 2013

PUCO

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**American Transmission Systems, Incorporated
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Akron, Ohio 44308**

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LETTER OF NOTIFICATION
**GALION-LEASIDE AND GALION TO ONTARIO SEGMENT OF GALION-
LONGVIEW 138 kV TRANSMISSION LINE RECONDUCTORING PROJECT**

The following information is being provided in accordance with the procedures delineated in Ohio Administrative Code Section 4906-11-01: Letter of Notification Requirements of the Rules and Regulations of the Ohio Power Siting Board.

4906-11-01 (B): LETTER OF NOTIFICATION REQUIREMENTS

4906-11-01 (B) (1) a: Name and Reference Number

Name of Project: Galion-Leaside and Galion to Ontario Segment of Galion-Longview 138 kV Transmission Line Reconductoring Project ("Project")

2013 LTFR Reference: This Project is identified on page 119 and 120 in FirstEnergy Corp.'s 2013 Electric Long-Term Forecast Report ("LTFR") submitted to the Public Utility Commission of Ohio in Case Number 13-925-EL-FOR.

4906-11-01 (B) (1) b: Brief Description of Project

In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, is proposing to remove and upgrade the current conductors along the existing Galion-Leaside 138 kV Transmission Line and the Galion to Ontario Segment of Galion-Longview 138 kV Transmission Lines. The Project also includes reinforcing 61 existing tower structures, installing approximately 10 wood pole intermediate structures, and replacing approximately 10 wooden poles along the existing transmission lines. The Project originates at ATSI's existing Galion Substation in Morrow County and extends east and then northeast along the existing transmission line structures and right-of-way into Crawford County, and continues northeast before turning southeast and south to the existing ATSI Ontario Substation in Richland County. The total length of the Project is approximately 16.5 miles. Exhibit 1 shows the General Location of the Project.

The overall Galion-Longview 138 kV Transmission Line Reconductor Project is being proposed in two stages. The first stage, which is the subject of this Letter of

Notification, is identified as the Galion-Leaside and Galion to Ontario Segment of the Galion-Longview 138kV Transmission Line Reconductoring Project. The second stage of the overall Galion-Longview 138 kV Transmission Line Reconductor Project is identified as the Ontario to Longview Segment of the Galion-Longview 138 kV Transmission Line Reconductoring Project and is the subject of the letter of notification filed in Case No. 13-1248-EL-BLN.

The first eight miles of the Galion to Ontario Segment of Galion-Longview 138 kV Transmission Line are on the same structures as the Galion-Leaside 138 kV Transmission Line that extends from the Galion Substation in Morrow County, Ohio to the Leaside Substation, in Richland County, Ohio. The Galion-Leaside 138 kV Transmission Line and the Galion to Ontario Segment of Galion-Longview 138 kV Transmission Line will share the proposed intermediate structures where these lines share existing structures for the first eight miles of this Project.

The reconductoring work on the Galion to Ontario Segment of the Galion-Longview 138 kV Transmission Line will involve replacing approximately 16.5 miles of 477 kmil 26/7 ACSR conductor with 477 ACSS/TW Type 23 HS conductor. The reconductoring work on the Galion-Leaside 138 kV Transmission Line will involve replacing approximately 8.5 miles of 336.4 kmil 26/7 ACSR conductor with 336.4 ACSS/TW Type 23 HS conductor. The intermediate structures will be approximately 80 to 100 feet tall. The proposed intermediate structures are shown in Exhibit 3 and the approximate locations of the structures are shown in Exhibit 2 and Exhibit 2A. The proposed H-frame replacement structures are shown in Exhibit 4 and the proposed 3 pole replacement structures is shown in Exhibit 5. The approximate locations of the structures are shown in Exhibits 2 & 2A.

The Project area is located in an existing transmission corridor in North Bloomfield Township in Morrow County, Polk Township in Crawford County, and Sandusky and Springfield Townships and the City of Ontario in Richland County, Ohio. The existing and reconducted transmission line will be owned and operated by ATSI.

4906-11-01 (B) (1) c: Why the Project Meets the Requirements for a Letter of Notification

The Project meets the requirements for a Letter of Notification because the Project is within the types of projects defined by Items (3) and (4)(a) of the Interim Application Requirement Matrix for Electric Power Transmission Lines in Attachment A of Case Number 12-1981-GE-BRO. Attachment A provides:

- (3) Replacing conductors on existing structures with larger or bundled conductors.*

And

- (4) Replacing electric power transmission line structure(s) with a different type of structure(s) or adding structure(s) within an existing electric power transmission line and:*

- (a) Two miles or less of new right-of-way is required.*

The proposed Project replaces approximately 16.5 miles of conductor on the Galion to Ontario Segment of Galion-Longview 138 kV Transmission Line and approximately 8.5 miles of conductor on the Galion-Leaside 138 kV Transmission Line. The proposed intermediate structures are within the existing transmission right of way.

4906-11-01 (B) (2): Need for the Project

The PJM Generator Deliverability Analysis and also the Generation Retirement Analysis determined that for the loss of the Brookside – Howard & the Brookside – Leaside 138 kV lines, the Galion – Longview 138 kV line loads to 107% of its summer emergency rating. Once the Project is complete, the Galion - Longview 138 kV line will be at approximately 67.8% of its summer emergency rating under this same outage condition.

The PJM Generator Deliverability Analysis and also the Generation Retirement Analysis determined that for the Galion Breaker B-54 Failure to Trip (an outage of the Galion – Longview 138 kV line & the Galion 138/69 kV Transformer #1), the

Galion – Leaside 138 kV line loads to 116% of its summer emergency rating. Once the Project is complete, the Galion – Leaside 138 kV line will be 76.9% of its summer emergency rating under this outage condition.

4906-11-01 (B) (3): Location Relative to Existing or Proposed Lines

The location of the Project relative to existing or proposed transmission lines is shown in the FirstEnergy System Facilities map, included as the last page of Chapter 3 of the confidential portion of the FirstEnergy Corp. 2013 Long-Term Forecast Report. This map was submitted to the PUCO in Case No. 13-925-EL-FOR under Rule 4901:5-5:04 (C) 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 location of the Galion-Longview 138 kV transmission line. The project area is located approximately 8 ½ inches (11 by 17 inch printed version) from the left edge of the map and 5 ½ inches (11 by 17 inch printed version) from the top of the map. The general location and layout of the Project is shown on Exhibit 1.

4906-11-01 (B) (4): Alternatives Considered

The alternatives considered for the Galion to Ontario Segment of Galion-Longview 138 kV Transmission Line were: to build a new Galion – Longview 138 kV line, to build the new Galion – Ashland – Star 345 kV line, or to rebuild the Galion – Alta 69 kV and the Alta – Longview 69 kV lines as double circuit 138 kV and 69 kV lines. These alternatives were not chosen because they could not be completed by the needed June 1, 2014 in-service date.

The alternative considered for the Galion-Leaside 138 kV Transmission Line was to rebuild the existing line to accommodate a larger conductor (795 ACSR). This alternative was not chosen because it could not be completed by the needed June 1, 2014 in-service date.

4906-11-01 (B) (5): Construction Schedule

Construction on the project is expected to begin as early as August 1, 2013 and be completed by May 31, 2014.

4906-11-01 (B) (6): Area Map

Exhibit 1 depicts the general location of the Project. This exhibit provides a partial copy of the United States Geologic Survey, Galion, Blooming Grove, Crestline, and Mansfield North topographic quadrangle maps. To locate and view the project site from Columbus, Ohio, travel north on I-71 approximately 32 miles and take exit 140 to merge onto OH-61 N toward Mount Gilead/Cardington for approximately 12.6 miles. At the traffic circle, continue straight onto OH-61 N (North Main Street), and continue for an additional 9.3 miles. Turn right onto OH-309 E / OH-61 N, and continue for approximately 1 mile. Turn right onto County Road 31 (Hunter Road) and travel approximately 0.8 mile. Turn right onto Edison Drive, and continue for approximately 0.1 mile. The Galion Substation will be on the left. The Project's transmission line extends to the east of the Galion Substation, following the existing transmission line corridor for approximately 8.5 miles, crossing Alderson Road, County Road 40, Ohio Route 19, Clase Road, Bloomington-New Winchester Road, Jackson Road, Ohio Route 97, Millsboro West Road, Crestline-Bloomington Grove Road, Lime Road, and State Route 309 before passing to the east of the Leaside Substation. The Project continues generally east for an additional five miles, crossing Ohio Route 181, Eckstein Road, Mansfield-Crestline Road, Snodgrass Road, Walcrest Drive, Ohio Route 314, Cookton Grange Road, Rock Road North, Springmill West Road, Walker Lake Road, State Route 30, Ferguson Road, Deerfield Lane, and West 4th Street, before coming to the Ontario Substation.

4906-11-01 (B) (7): Property Owner List

The Project is located on existing right-of-way. No new easements or right-of-way for the transmission structures will need to be acquired.

4906-11-01 (C): TECHNICAL FEATURES OF THE PROJECT

4906-11-01 (C) (1): Operating Characteristics

The reconductored transmission lines will have the following characteristics:

Galion to Ontario Segment of Galion-Longview 138 kV Transmission Line:

Voltage:	138 kV
Conductors:	
Existing –	477 kcmil 26/7 ACSR
New –	477 ACSS/TW Type 23 HS

Galion-Leaside 138 kV Transmission Line:

Voltage:	138 kV
Conductors:	
Existing –	336.4 kcmil 26/7 ACSR
New –	336.4 ACSS/TW Type 23 HS

Static wire:

Existing – to remain	101.8 kcmil 12/7 ACSR
Insulators:	138 kV polymer horizontal post, suspension and strain insulators

New Intermediate Structures: Exhibit 3 – Wood Pole Transmission Structure

Replacement Structures: Exhibit 4 – H- Frame Wood Pole Transmission Structure

Exhibit 5 – 3 Pole Wood Transmission Structure

The proposed Project will be located on the existing transmission line right-of-way.

4906-11-01 (C) (2) a: Calculated Electric and Magnetic Fields

The following table itemizes the line loading of the Galion – Longview and the Galion – Leaside 138 kV Transmission Lines. The normal line loading represents FirstEnergy's peak system load for the transmission lines. The emergency line loading represents the maximum line loading under contingency operation. The winter rating is based on the continuous maximum conductor ratings (MCR) of the circuits with an ambient temperature of zero degrees centigrade (32 deg. F), wind speed of 1.3 miles per hour, and a circuit design operating temperature of 100 degrees centigrade (212 deg. F).

Line Name	Normal Loading Amps	Emergency Loading Amps	Winter Rating Amps
Galion-Longview 138 kV Transmission Line	551	667	1566
Galion-Leaside 138 kV Transmission Line	425	648	1283

The following calculations provide an approximation of the magnetic and electric fields strengths of the Galion – Longview and the Galion – Leaside 138 kV Transmission Lines in the right-of-way. The calculations provide an approximation of the electric and magnetic field levels based on specific assumptions utilizing the EPRI EMF Workstation 2009 program software. This program software assumes the input transmission line configuration is located on flat terrain. Also, a balanced, three-phase circuit loading is assumed for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission lines.

EMF CALCULATIONS		Electric Field kV/meter	Magnet Field mGauss
Normal Loading	Under Lowest Conductors	0.877	54.36
	At Right-of-Way Edges	0.014 / 0.015	6.5 / 2.5
Emergency Loading	Under Lowest Conductors	0.877	71.11
	At Right-of-Way Edges	0.014 / 0.015	7.3 / 5.5
Winter Rating	Under Lowest Conductors	0.877	156.95
	At Right-of-Way Edges	0.014 / 0.015	17.5 / 8.4

4906-11-01 (C) (2) b: EMF Discussion

Background Information

Electric and magnetic fields (EMFs) are naturally occurring in the environment and can be found in the Earth's interior and in the human body. EMFs are generated essentially anywhere where there is a flow of electricity, including electrical appliances and power equipment. Electric fields are associated with the voltage of the source; magnetic fields are associated with the flow of current in a wire. The strength of these fields decreases rapidly with distance from the source. EMFs

associated with electricity use are not disruptive to cells like x-rays or ultraviolet rays from the sun. EMF fields are thought to be too weak to break molecules or chemical bonds in cells. Scientists have conducted extensive research over the past two decades to determine whether EMFs are associated with adverse health effects, and although the research and debate of this issue continues, at this time there is no firm basis to conclude that EMFs cause adverse health effects. A number of independent scientific panels have reviewed the research and have stated that there is no basis to conclude that EMFs cause adverse health effects nor has it been shown that levels in everyday life are harmful.

Recent Developments

As a part of the National Energy Policy Act of 1992, the Electric and Magnetic Fields Research and Public Information Dissemination (EMF RAPID) program was initiated within the five-year effort under the National EMF Research Program. The culmination of this five-year effort resulted in a final RAPID Working Group report, which was released for public review in August 1998. The Director of the National Institute of Environmental Health Sciences (NIEHS) then prepared a final report to Congress after receiving public comments. The NIEHS' Director's final report, released to Congress on May 4, 1999, concluded that extremely low frequency electric and magnetic fields (ELF-EMF) exposure cannot be recognized at this time as entirely safe because of weak scientific evidence that exposure may pose a leukemia hazard. The Director further stated that the conclusion of this report is insufficient to warrant aggressive regulatory concern.

Sources for Additional Information

The following websites sponsored by federal agencies or other organizations provide additional information on EMF:

- Centers for Disease Control/National Institute for Occupational Safety and Health: <http://www.cdc.gov/niosh/topics/emf/>
- National Institute of Environmental Health Sciences (NIEHS) EMF Rapid Program: <http://www.niehs.nih.gov/health/topics/agents/emf/>

4906-11-01 (C) (3): Estimated Costs

The following are the estimated capital costs by FERC Accounts for the proposed project:

<u>Account</u>	<u>Cost</u>
350 Land Rights	\$ 125,000
355 Poles and Fixtures	\$ 1,220,000
356 Overhead Conductors & Devices	\$ 1,378,000
Total	\$ 2,723,000

4906-11-01 D: SOCIOECONOMIC DATA

4906-11-01 (D) (1): Land Use

The Project is located in North Bloomfield Township, in Morrow County, Ohio; Polk Township, in Crawford County, Ohio; and Sandusky and Springfield Townships in Richland County Ohio. The Project also passes through a portion of the City of Ontario, in Richland County. There are various land uses along the route of the line, and mainly include agricultural and residential uses, with commercial and industrial uses to a lesser extent. Based on the U.S. Bureau of Census estimates, the 2010 population of North Bloomfield Township was 1,863, Polk Township was 2,132, Sandusky Township was 993, and Springfield Township was 10,685. The 2010 population of Morrow County was 34,827, Crawford County was 43,784, and Richland County was 124,475. The 2010 population of the City of Ontario, Ohio was 6,225. As the proposed Project involves replacing the existing conductors of the transmission line, no significant changes or impacts to the current land use is anticipated.

4906-11-01 (D) (2): Agricultural Land

URS Corporation contacted the Morrow, Crawford, and Richland County auditors to determine if any agricultural district land parcels are crossed by the Project on April 12, 2013. Responses were received from both the Morrow and Crawford County auditors on April 18, 2013. The Richland County auditor responded on April 30, 2013. No agricultural district land parcels are crossed by the Project in Crawford County. One agricultural district land parcel is crossed by the Project in

Morrow County, for approximately 0.48 mile. Twenty-six agricultural district land parcels are crossed by the Project in Richland County, for a total of approximately 4.07 miles. Agricultural district land parcels are shown on Exhibits 2A-2N. Because overhead electric transmission lines pass above agricultural land, they are generally compatible with agricultural land use. Given the nature of the Project, and its close proximity to existing similar transmission facilities, , it is anticipated that impacts will be minimal to agricultural land from the Project. .

4906-11-01 (D) (3): Archaeological or Cultural Resources

URS Corporation consulted the Ohio Historic Preservation Office (OHPO) online mapping system in April 2013, in an effort to locate cultural resources inventoried within one mile (1.6 kilometers) of the Project, a buffer referred to hereafter as the Archival Study Area. The archival study included a review of the Ohio Archaeological Inventory (OAI), Ohio Historic Inventory (OHI), cemeteries inventory, and the National Register of Historic Places (NRHP). The background research conducted by URS produced the following data relative to the Project:

- A total of 176 OAI-listed archaeological resources have previously been inventoried within the Archival Study Area for the Project. Of these, 158 are exclusively prehistoric in character, 17 contain historic-era archaeological deposits only, and one site contains both prehistoric and historic-era components;
- A total of 24 OHI-listed aboveground structural resource have been inventoried within one mile of the Project;
- Six historic-era cemeteries have been catalogued by the OHPO within one mile of the Project; and,
- Six CRM-related reports have been filed with the OHPO for archaeological/architectural history work conducted within one mile of the Project.

None of the inventoried resources referenced above have been recorded directly within the alignment for the Project. The incidence of archaeological activity within one mile of the Project is considered to be high, due to the location of an extensive inventory of prehistoric and historic-era archaeological sites documented primarily as a result of a 1990s survey. The overwhelming majority of these resources

(n=161, or 91 percent) represent undifferentiated, ephemeral prehistoric archaeological resources which lack integrity or context. With regard to historic-era resources, very few archaeological sites within one mile of the Project contained historic-era materials. A total of 24 aboveground resources have been listed in the OHI, and six cemeteries have been catalogued by the OHPO, within one mile of the Project. The examination of the extant historic mapping available for this portion of Ohio suggests that the majority of the proposed alignment would have been situated within agricultural fields and wooded lots during the late 19th and 20th centuries, with sustained occupations present in the vicinity of the Project at major road crossings.

Based on the parameters of the Project, the reconductoring of the transmission line will not involve the construction and/or installation of any new infrastructure. Therefore, ATSI and URS recommend that no further archaeological or historic architecture research is necessary for the Project, unless areas of ground disturbance, or permanent infrastructure, are considered for the Project. In the event that the Project is modified to involve permanent construction or areas of ground disturbance, ATSI and URS recommend a standard Phase I-level archaeological field reconnaissance of these areas, conforming to the OHPO guidelines (15-meter shovel test interval). In the absence of any new transmission corridor infrastructure, apart from the new line strung onto existing towers/poles, the Project is considered to pose no impacts to the surrounding viewshed, and no historic architecture survey is therefore recommended.

4906-11-01 (D) (4) a: Documentation of Letter of Notification Transmittal

This Letter of Notification is being provided concurrently to the following officials of Morrow, Crawford, and Richland Counties, Ohio.

Morrow County

The Honorable Richard J. Miller
Morrow County Commissioner
80 North Walnut Street, Suite A
Mount Gilead, Ohio 43338

The Honorable Tom Harden
Morrow County Commissioner
80 North Walnut Street, Suite A
Mount Gilead, Ohio 43338

The Honorable Thomas E. Whiston
Morrow County Commissioner
80 North Walnut Street, Suite A
Mount Gilead, Ohio 43338

Mr. L. Randy Bush, P.E., P.S.
Morrow County Engineer
109 East High Street
Mount Gilead, Ohio 43338

North Bloomfield Township

Mr. Cory Miley
Trustee, North Bloomfield Township
4815 County Road 31
Galion, Ohio 44833

Mr. Warren Davis
Trustee, North Bloomfield Township
7955 Crawford Morrow County Line
Rd.
Galion, Ohio 44833

Mr. Stanley Stoney
Trustee, North Bloomfield Township
8499 Twp. Road 56
Mansfield, Ohio 44904

Ms. Barbara Miley
Fiscal Officer, North Bloomfield
Township
4825 County Road 31
Galion, Ohio 44833

Crawford County

The Honorable Steve Reinhard
Crawford County Commissioner
112 East Mansfield Street, Suite 304
Bucyrus, Ohio 44820

The Honorable Jenny Vermillion
Crawford County Commissioner
112 East Mansfield Street, Suite 304
Bucyrus, Ohio 44820

The Honorable Douglas Weisenauer
Crawford County Commissioner
112 East Mansfield Street, Suite 304
Bucyrus, Ohio 44820

Mr. Mark E. Baker, P.E., P.S.
Crawford County Engineer
815 Whetstone Street
Bucyrus, Ohio 44820

Polk Township

Mr. Glenn E. Cheesman
Trustee, Polk Township
1270 Biddle Rd.
Galion, Ohio 44833

Mr. Jim Grogg, Jr.
Trustee, Polk Township
365 E. Brandt Road
Galion, Ohio 44833

Mr. Tom Ray
Trustee, Polk Township
5959 W. Brandt Rd.
Galion, Ohio 44833

Ms. Patricia L. Rondon
Fiscal Officer, Polk Township
5827 Monnett New Winchester Rd.
Galion, Ohio 44833

Richland County

The Honorable Edward W. Olson
Richland County Commissioner
50 Park Avenue East
Mansfield, Ohio 44902
The Honorable Tim Wert
Richland County Commissioner
50 Park Avenue East
Mansfield, Ohio 44902

The Honorable Gary Utt
Richland County Commissioner
50 Park Avenue East
Mansfield, Ohio 44902

Mr. Thomas E. Beck, P.E., P.S.
Richland County Engineer
77 North Mulberry Street
Mansfield, Ohio 44902

Sandusky Township

Mr. Daniel G. Gorbett
Trustee, Sandusky Township
5094 Lime Road
Galion, Ohio 44833

Mr. Thomas E. Glauer
Trustee, Sandusky Township
5201 Hook Road
Crestline, Ohio 44827

Mr. Phil Jackson
Trustee, Sandusky Township
177 South Horning Road
Mansfield, Ohio 44903

Ms. Sally A. Glauer
Fiscal Officer, Sandusky Township
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Crestline, Ohio 44827

Springfield Township

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Trustee, Springfield Township
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Michael Frye
Trustee, Springfield Township
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Robert W. Currens
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Sharon Willcox
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City of Mansfield

The Honorable Timothy Theaker
Mayor, City of Mansfield
30 N Diamond St
9th Floor
Mansfield, OH 44902

Ms Amy Yockey
Clerk of Council, City of Mansfield
30 N Diamond St
Mansfield, OH 44902

Mr. Phillip Scott
President, City of Mansfield Council
30 N Diamond St
Mansfield, OH 44902

Mr. Robert Bianchi, P.E.
Mansfield City Engineer
30 N Diamond St
Mansfield, OH 44902

City of Ontario

The Honorable Larry C. Collins
Mayor, City of Ontario
Ontario Municipal Building
555 Stumbo Road
Ontario, Ohio 44906

Mr. Daniel Zeiter
President, City of Ontario City Council
Ontario Municipal Building
555 Stumbo Road
Ontario, Ohio 44906

Ms. Cathy Van Auker
Clerk of Council, City of Ontario
City Council
Ontario Municipal Building
555 Stumbo Road
Ontario, Ohio 44906

Ms. Linda Timmer
Ontario City Engineer
3375 Milligan Road
Ontario, Ohio 44906

Copies of the transmittal letters to these officials have been included with the transmittal letter submitting this Letter of Notification to the Ohio Power Siting Board.

4906-11-01 (D) (4) b: Public Information Program

ATSI's manager of External Affairs will advise local officials of features and the status of the proposed Transmission Line Project as necessary.

4906-11-01 (D) 5: Current or Pending Litigation

There is no known current or pending litigation involving this project.

4906-11-01 (D) 6: Local, State, and Federal Requirements

There are no other known local, state, or federal requirements that must be met prior to commencement of construction on the proposed transmission line project.

4906-11-01 (E): ENVIRONMENTAL DATA

4906-11-01 (E) (1): Endangered, Threatened, and Rare Species Investigation

As part of the investigation, a request was submitted to the Ohio Department of Natural Resources-Division of Wildlife (ODNR-DOW), Ohio Natural Heritage Database (OBD), and U.S. Fish and Wildlife Service (USFWS) to provide initial comments regarding the Project. Copies of agency letters are attached as Exhibits 6-9.

Ohio Natural Heritage Database provided a letter and ArcGIS shapefiles; however no listed species were identified near the Project area.

On May 15, 2013, ODNR-DOW provided comments on seven state protected species; Indiana bat (*Myotis sodalis*), rayed bean (*Villosa fabalis*), purplish copper (*Lycaena helloides*), eastern massassauga (*Sistrurus catenatus*), black bear (*Ursus americanus*), eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), and upland sandpiper (*Bartramia longicauda*). ODNR-DOW identified that three species are likely to not be impacted by the Project due to the Project area and type of work. ODNR-DOW recommended that if suitable habitat trees must be cut, cutting should occur between October 1st and March 31st to avoid impacts to Indiana bats. If suitable habitat tree cutting must occur during the summer months, a mist net survey must be conducted between June 15th and July 31st. ODNR-DOW said that if there is a history of mussels near the proposed Project area, it may be necessary for a professional malacologist approved by ODNR-DOW to conduct a mussel survey in the project area. To minimize potential impacts to the eastern hellbender, ODNR-DOW recommended that the Project be developed to minimize indirect stream impacts. ODNR-DOW indicated that their records do not indicate that the upland sandpiper is absent from the project area, so if dry grasslands (including native grasslands), seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP) must be impacted, construction must be avoided in this habitat during the species' nesting period of April 15th to July 31st. If the described habitats are not being impacted, then the Project is not likely to impact the upland sandpiper.

On May 1, 2013, USFWS provided a letter response that identified only one species of concern, the Indiana bat. USFWS recommended that if present, suitable habitat should be left in place, however if the trees cannot be avoided, they should be cut between October 1st and March 31st. If implementation of the seasonal tree cutting restriction is not possible, summer surveys (between May 15th and August 15th) should

be conducted following coordination with USFWS. USFWS said that due to the project type, size and location, they do not anticipate adverse effect to any other federally endangered, threatened, proposed, or candidate species.

4906-11-01 (E) (2): Areas of Ecological Concern

The existing transmission line structures which are to be reconductored in the proposed Project are located within an existing transmission line corridor. The structures to be replaced and the proposed intermediate structures will also be located within the existing transmission line corridor. The summary of impacts discussed below generally pertains only to the existing ROW for the Project.

A total of 43 wetlands, 40 streams, and five ponds were identified within the existing and maintained 100-175 foot wide ROW during the field surveys. These wetlands and other water features are discussed in detail in the following sections.

Wetlands - The delineation identified 43 wetlands (the first 21 wetlands are located where the Galion-Leaside Transmission Line and the Galion to Ontario Segment of the Galion Longview Transmission Line share structures), totaling 8.06 acres, within the 100-175 foot existing and maintained ROW. These wetlands are of four different wetland habitat types: 34 are palustrine emergent (PEM) wetlands, four are palustrine scrub-shrub (PSS) wetlands, four are palustrine scrub-shrub/emergent (PSS/PEM) wetlands, and one is a palustrine forested (PFO) wetland. Twenty-nine of the wetlands are Category 1 wetlands, and 14 are Category 2 wetlands. No Category 3 wetlands were delineated within the ROW.

Streams - The delineation identified 40 streams, totaling 6,573 linear feet, within the 100-175 foot wide existing and maintained ROW. Fifteen of the streams were perennial, 22 were intermittent, and three were ephemeral. Thirty-two of the streams were assessed using the HHEI methodology (drainage area less than 1 mi²), and the remaining eight streams were assessed using the QHEI methodology (drainage area greater than 1 mi²). Four of the HHEI streams were classified as Class I streams,

three were classified as Modified Class I streams, eight were classified as Class II streams, and 17 were classified as Modified Class II streams. Two of the QHEI streams were classified as poor warmwater streams, three were classified as fair warmwater streams, and three were classified as good warmwater streams.

Ponds – Five ponds totaling approximately 0.38 acres were also identified within the 100-175 foot wide ROW. The ponds appear to be man-made and used for stormwater retention, recreation or livestock uses.

A copy of the wetland delineation report will be provided separately to the Board's staff.

4906-11-01 (E) (3): Additional Information

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



LEGEND

- Substation
- Gallon-Leaside & Gallon-Ontario 138 kV Transmission Lines
- City Boundary
- 7.5 Topographic Quadrangle Boundary

Scale in Feet

0 5,500 11,000

BASE MAP SOURCE:
USGS Online
USA Topo Maps
North Robinson, OH; Crestline, OH; Mansfield North, OH;
Gallon, OH; Blooming Grove, OH; Mansfield South, OH;
7.5 Topographic quadrangles

ATSI

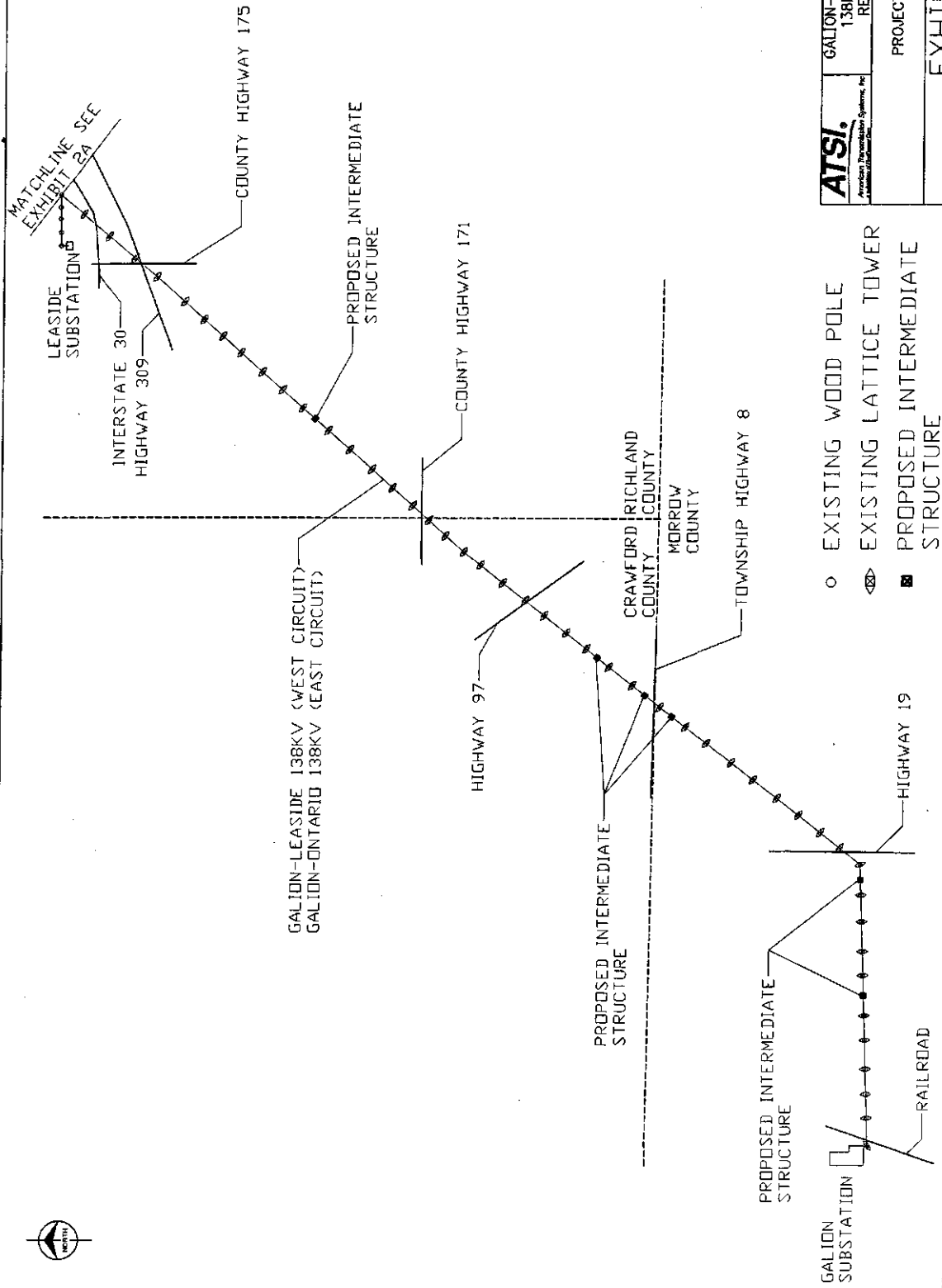
Gallon-Leaside and Gallon to Ontario
Segment of Gallon-Longview 138 kV
Transmission Line Reconducting Project

EXHIBIT 1

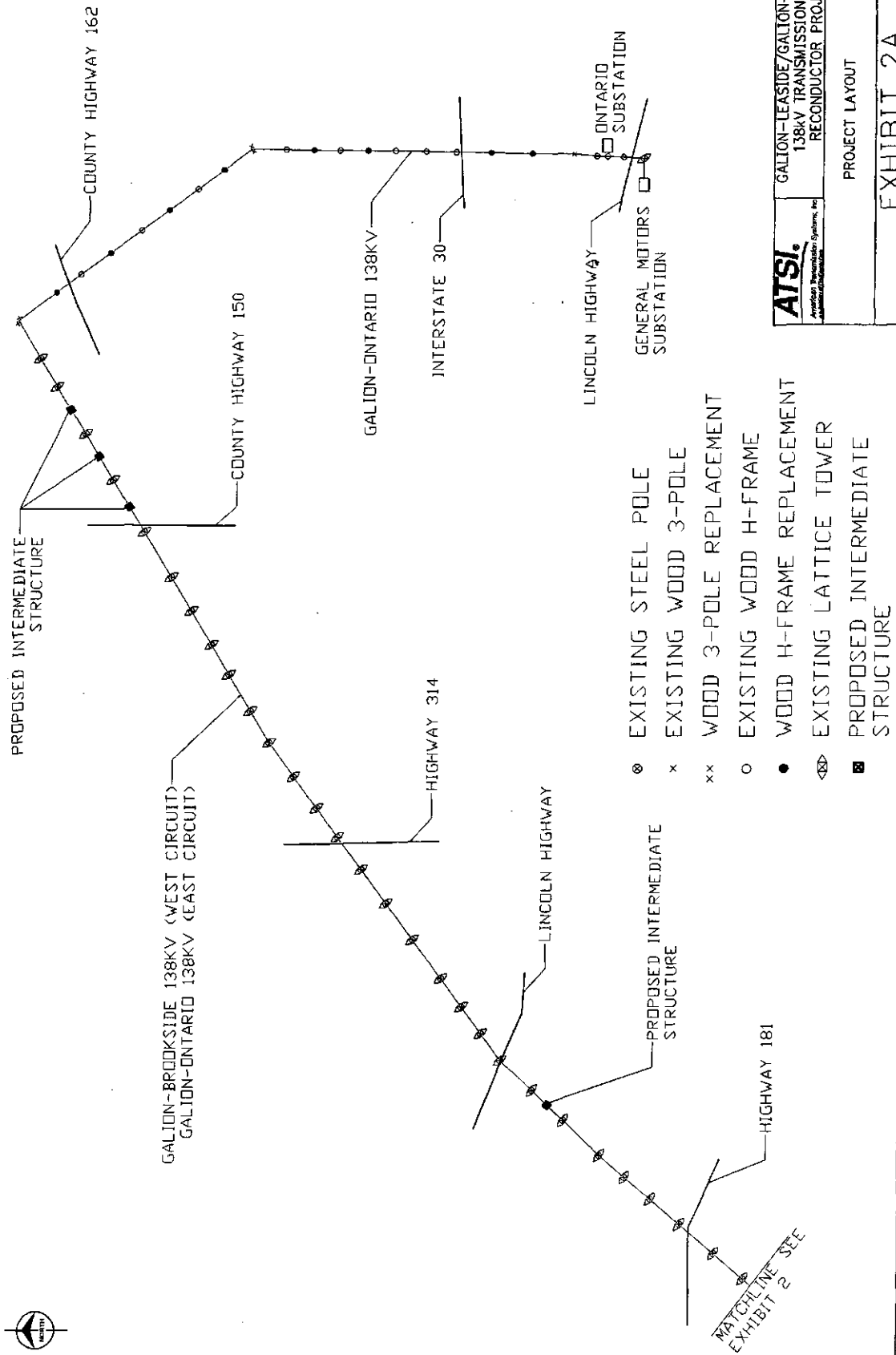
OVERVIEW MAP

URS

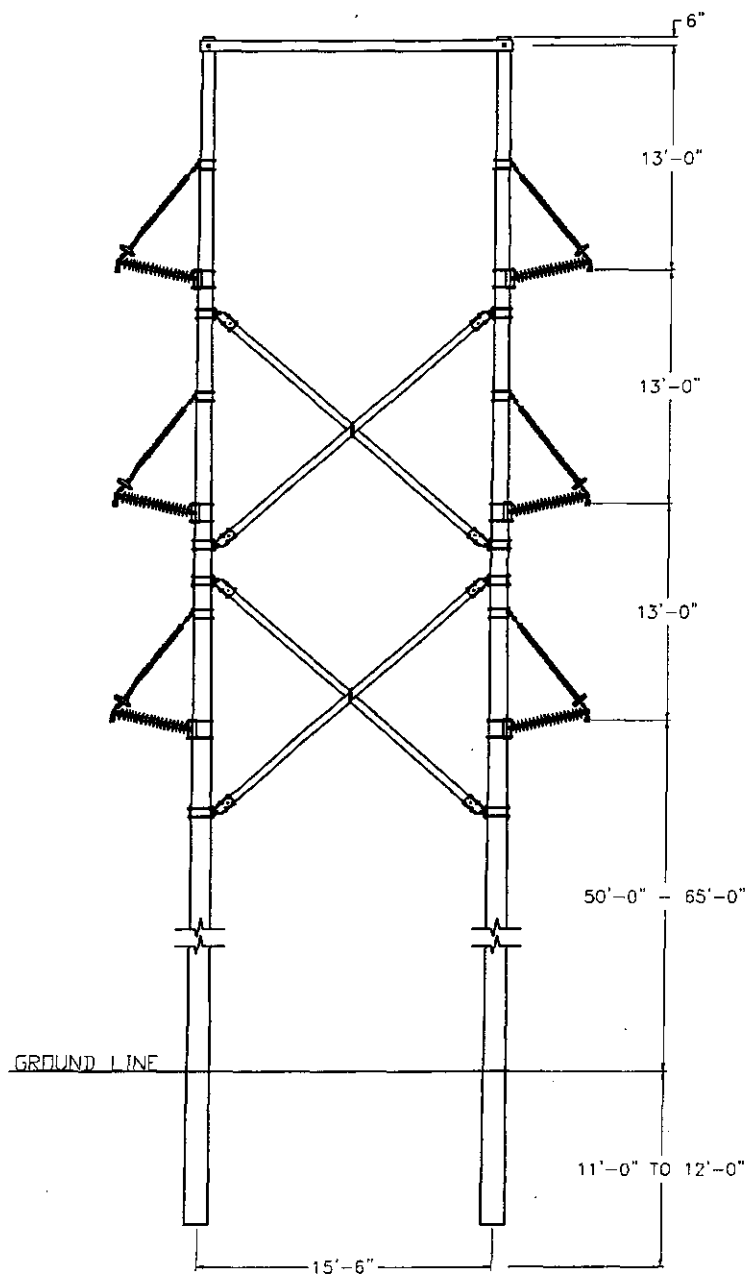
JOB NO. 14851182



ATSI. American Transmission Systems, Inc.	GALION-LEASIDE/GALION-ONTARIO 138KV TRANSMISSION LINE RECONDUCTOR PROJECT
	PROJECT LAYOUT
EXHIBIT 2	



ATSI. Advanced Transmission Systems, Inc. 10000 Highway 100, Suite 100 Galion, Ohio 44827	GALION-LEASIDE/GALION-ONTARIO 138KV TRANSMISSION LINE RECONDUCTOR PROJECT
	PROJECT LAYOUT
EXHIBIT 2A	



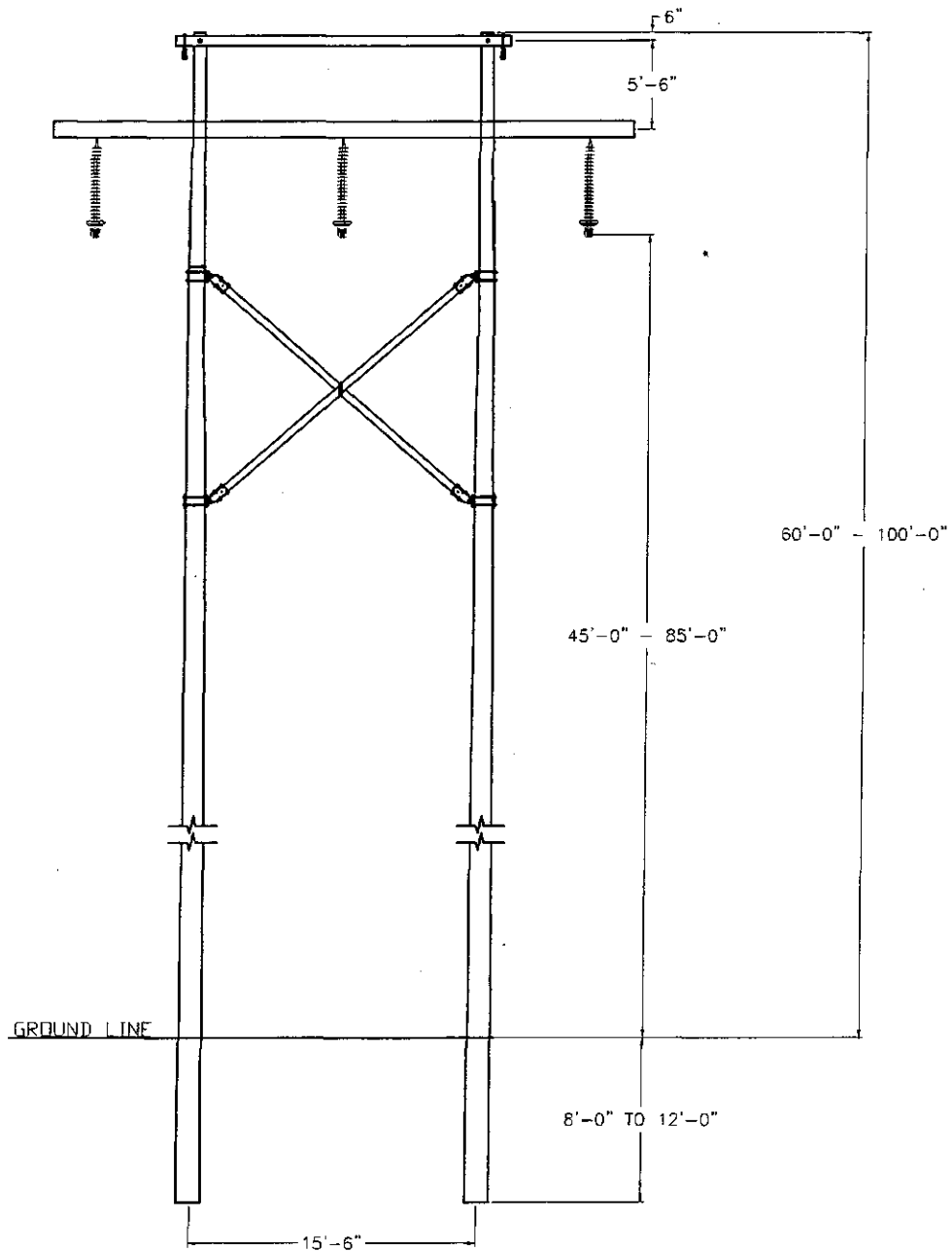
ATSI[®]

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

GALION-LEASIDE/GALION-ONTARIO
138kV TRANSMISSION LINE
RECONDUCTOR PROJECT

PROPOSED INTERMEDIATE
STRUCTURE

EXHIBIT 3



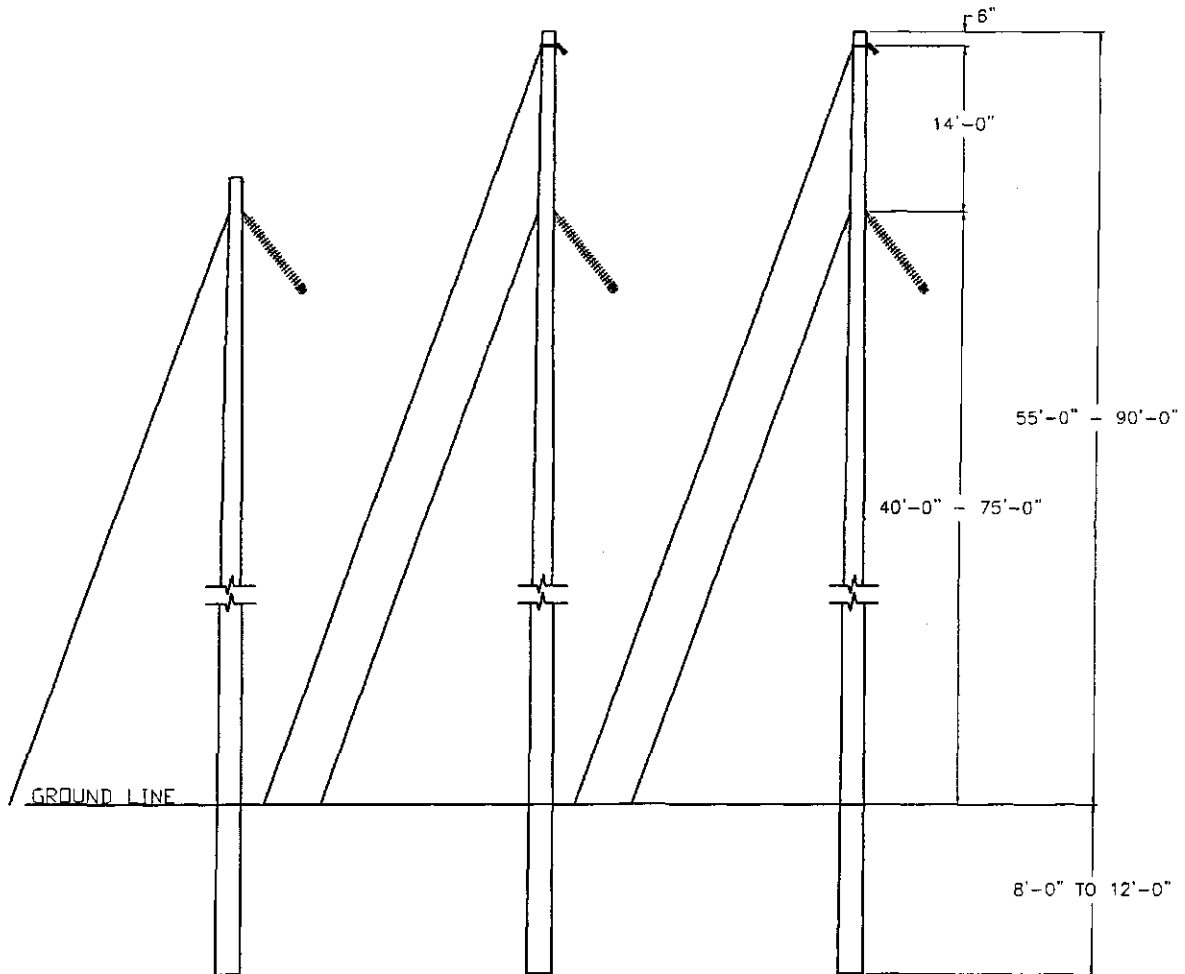
ATSI[®]

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

GALION-LEASIDE/GALION-ONTARIO
138kV TRANSMISSION LINE
RECONDUCTOR PROJECT

PROPOSED REPLACEMENT
STRUCTURE

EXHIBIT 4



ATSI[®]

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

GALION-LEASIDE/GALION-ONTARIO
138kV TRANSMISSION LINE
RECONDUCTOR PROJECT

PROPOSED REPLACEMENT
STRUCTURE

EXHIBIT 5

Thomayer, Matt

From: Kessler, John <John.Kessler@dnr.state.oh.us>
Sent: Wednesday, May 15, 2013 3:43 PM
To: Thomayer, Matt
Cc: Tebbe, Sarah
Subject: FW: 13-206 Comments Galion-Longview 138 kV Transmisison line - URS
Attachments: Ohio Mussel Survey Protocols.pdf



ODNR COMMENTS TO: URS; Matt Thomayer, matt.thomayer@urs.com

Project: Galion-Longview 138 kV Transmission Line - URS

Location: Morrow, Crawford, and Richland Counties, 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.

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

All Counties

The project is within the range of the Indiana bat (*Myotis sodalis*), a state and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: Shagbark hickory (*Carya ovata*), Shellbark hickory (*Carya laciniosa*), Bitternut hickory (*Carya cordiformis*), Black ash (*Fraxinus nigra*), Green ash (*Fraxinus pennsylvanica*), White ash (*Fraxinus americana*), Shingle oak (*Quercus imbricaria*), Northern red oak (*Quercus rubra*), Slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), Eastern cottonwood (*Populus deltoides*), Silver maple (*Acer saccharinum*), Sassafras (*Sassafras albidum*), Post oak (*Quercus stellata*), and White oak (*Quercus alba*). Indiana bat habitat consists of suitable trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. If suitable trees occur within the project area, these trees should be conserved. If suitable habitat occurs on the project area and trees must be cut, cutting must occur between October 1 and March 31. If suitable trees must be cut during the summer months, a net survey must be conducted between June 15 and July 31, prior to cutting. Net surveys shall incorporate either two net sites per square kilometer of project area with each net site containing a minimum of two nets used for two consecutive nights, or one net site per kilometer of stream within the project limits with each net site containing a minimum of two nets used for two consecutive nights. If no tree removal is proposed, the project is not likely to impact this species.

If there is a history of mussels near the proposed project area, it may be necessary for a professional malacologist approved by the DOW to conduct a mussel survey in the project area. Please refer to the Ohio Mussel Protocol for guidance on conducting mussel surveys in Ohio.

Morrow County

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federal endangered mussel species.

The project is within the range of the purplish copper (*Lycaena helloides*), a state endangered butterfly. Due to the habitat used by this species and the type of work proposed, the project is not likely to impact this species.

Crawford County

The project is within the range of the Eastern massasauga (*Sistrurus catenatus*), a state endangered and a federal candidate snake species. Due to the lack of records in the project area for this species and the land use of the project area, the project is not likely to impact this species.

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federal endangered mussel species.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, the project is not likely to have an impact on this species.

Richland County

The project is within the range of the Eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered amphibian currently being evaluated for Federal Candidate status. We recommend that the proposed project be developed to minimize indirect stream impacts (e.g., preserve wide riparian buffers, maximize erosion control, maximize permeable surfaces and storm-water retention).

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, the project is not likely to impact this species.

The project is within the range of the Eastern massasauga (*Sistrurus catenatus*), a state endangered and a federal candidate snake species. Due to the lack of records in the project area for this species and the land use of the project area, the project is not likely to impact this species.

The project is within the range of the Upland Sandpiper (*Bartramia longicauda*), a state endangered bird. A statewide survey has not been completed for this species. A lack of records does not indicate the species is absent from the area. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction must be avoided in this habitat during the species' nesting period of April 15 to July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The ODNR Natural Heritage Database has no records for rare or endangered species at this project site. We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges or other protected natural areas within the project area. Our inventory program does not provide a complete survey of Ohio wildlife, and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

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ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler, P.E.
Environmental Services Administrator
Office of Real Estate
Ohio Department of Natural Resources
2045 Morse Rd., Columbus, OH 43229-6605
phone: 614-265-6621
email: john.kessler@dnr.state.oh.us

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
May 1, 2013

URS Corporation
Attn: Matthew Thomayer
525 Vine Street, Suite 1800
Cincinnati, OH 45202

TAILS: 03E15000-2013-TA-0853

Re: Part 1: Galion-Longview 138 kV Transmission Line – Morrow, Crawford and Richland Counties,

Dear Mr. Thomayer,

We have received your recent correspondence requesting information about the subject proposal. There are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under Section 7 of the Endangered Species Act of 1973, as amended (ESA).

The Service recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the 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. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

ENDANGERED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the **Indiana bat** (*Myotis sodalis*), a federally listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees. Fragmentation of forest habitat may also contribute to declines. During winter, Indiana bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;
- (2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;
- (3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

Should habitat exhibiting the characteristics described above be present at the proposed project site, we recommend that they, as well as surrounding trees, be saved wherever possible. However, if these trees

cannot be avoided, they should only be cut between October 1 and March 31. If implementation of the seasonal tree cutting restriction is not possible, summer surveys should be conducted to document the presence or likely absence of the Indiana bat within the project area during the summer. The survey must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Summer surveys must be conducted between May 15 and August 15, when the presence of maternity colonies of Indiana bats could be detected.

If there is a Federal nexus for the project (e.g., Federal funding provided, Federal permits required to construct), no tree clearing on any portion of the parcel should occur until consultation under section 7 of the ESA, between the Service and the Federal action agency, is completed. We recommend that the Federal action agency submit a determination of effects to this office, relative to the Indiana bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

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 Endangered Species Act of 1973 (ESA), as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U. S. Fish and Wildlife Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Sincerely,

A handwritten signature in cursive script that reads "Mary Knapp".

Mary Knapp, Ph.D.
Field Supervisor

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
May 1, 2013

URS Corporation
Attn: Matthew Thomayer
525 Vine Street, Suite 1800
Cincinnati, OH 45202

TAILS: 03E15000-2013-TA-0809

Re: Galion-Leaside 138kV Line – Morrow, Crawford and Richland Counties, Ohio

Dear Mr. Thomayer,

We have received your recent correspondence requesting information about the subject proposal. There are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under Section 7 of the Endangered Species Act of 1973, as amended (ESA).

The Service recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the 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. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

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Sincerely,

A handwritten signature in cursive script that reads "Mary Knapp".

Mary Knapp, Ph.D.
Field Supervisor

Thomayer, Matt

From: Kessler, John <John.Kessler@dnr.state.oh.us>
Sent: Wednesday, May 15, 2013 3:49 PM
To: Thomayer, Matt
Cc: Tebbe, Sarah
Subject: FW: 13-208 Comments Galion- Leaside 138 kV Reconductor Project- URS
Attachments: Ohio Mussel Survey Protocols.pdf



ODNR COMMENTS TO: URS; Matt Thomayer, matt.thomayer@urs.com

Project: Galion-Leaside 138 kV Reconductor Project - URS

Location: Morrow, Crawford, and Richland Counties, 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.

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Environmental Services Administrator
Office of Real Estate
Ohio Department of Natural Resources

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phone: 614-265-6621
email: john.kessler@dnr.state.oh.us