

March 4, 2016

Ms. Barcy F. McNeal
Docketing Division
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Supplemental Information
138 kV Transmission Line
Loops to Yager Substation Project
Case No. 16-0257-EL-BLN

Dear Ms. McNeal,

This letter provides supplemental information to the Ohio Power Siting Board ("Board") concerning two aspects of the construction of the 138 kV Transmission Line Loops to Yager Substation Project ("Project"), Case No. 16-0257-EL-BLN. In this Project, American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, is proposing to loop the existing Harmon-Holloway No. 1 & Cloverdale-Holloway No. 2 138 kV Transmission Lines into AEP Ohio Transmission Company, Inc.'s ("AEP") Yager Substation. In particular, this submittal provides information obtained from the Ohio Department of Natural Resources ("ODNR") Real Estate Office and US Fish and Wildlife ("USFW") concerning the Project area, and a Phase I cultural resource survey.

This Project is being proposed in conjunction with AEP submittal to the Board for the Yager Transmission Station Project, Case No. 15-1666-EL-BLN. AEP filed the application in that case on October 6, 2015 and the filing was approved on November 4, 2015. Because the AEP Yager Transmission Substation Project and this Project are interrelated, this Project's footprint falls entirely within the area previously studied for the AEP's Yager Transmission Station Project. As part of AEP's submittal in Case no. 15-1666-EL-BLN, AEP included responses from ODNR's Real Estate Office and USFWS applicable to the Project Area. As these evaluations cover the entirety of the Project's footprint, they should be considered in this Project.

ODNR's Real Estate Office provided a letter response for information on sensitive species on May 26, 2015 to AEP. ODNR indicated that there are potentially eight threatened or endangered species within the Project area. This letter indicated that ODNR did not believe that the AEP Yager Transmission Substation Project, would not impact seven of the eight identified species. The lone exception was the Indiana Bat, the letter describes the exception as follows:

"The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: 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 roost trees consists of 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. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.”

The ODNR letter concluded with the following recommendation:

“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.”

Although the ODNR letter to AEP was dated May 26, 2015, AEP had already at that time conducted the recommended coordination with USFWS, as evidenced by USFWS’s letter to AEP dated April 22, 2015. In this letter, USFWS stated that:

“There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. We recommend that proposed activities minimize water quality impacts, including fill in streams and wetlands. Best management practices should be utilized to minimize erosion and sedimentation.”

The USFW also commented on that anticipated lack of impacts on federally listed, proposed, and candidate species within the project area:

“Due to the project type, size, location, and the proposed implementation of seasonal tree cutting (only clearing between October 1 and March 31) to avoid impacts to Indiana bats and northern longeared bats, we do not anticipate adverse effects to any 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.”

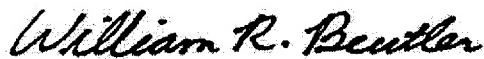
Consequently, ATSI believes that not only have both USFWS and ODNR been consulted regarding transmission related construction in the Project area, but that since tree clearing on the Project is proposed to be completed by March 31, 2016, no impacts are expected to any threatened, endangered or sensitive species. As such, the current construction plan for the Project is consistent with the ODNR & USFW’s recommendation of seasonal tree clearing and no further consultation or coordination is needed.

Finally, please find attached the recently completed Phase I culture resource survey completed by AECOM on the Project area. A copy of AECOM Cultural Resource Summary has been provided to the Board’s staff. The focus of this study was to evaluate the potential location of a cemetery within the Project’s footprint. AECOM’s summary concludes:

“Based on the summary and conclusions of this archival study and field reconnaissance, no further investigations appear to be warranted in relation to the McMillan Cemetery for the Project. There is no conclusive evidence that a cemetery was ever located within or near the Study Area, and the OHPO point-feature for the McMillan Cemetery is almost certainly associated with the cemetery situated on the former McMillan/Patterson land-tract near the intersection of Patterson Road and Baldwin Road, between 1500 and 2000 feet to the west of the proposed pole locations. Should any extant historic-era features or materials associated with a cemetery (such as headstones) be encountered during construction of the Project, however, construction should be temporarily suspended in the immediate vicinity of the unanticipated discovery, to allow for further evaluation.”

Should the Ohio Power Siting Board desire further information or discussion of this submittal, please contact me at (330) 384-2740.

Sincerely,



William R. Beutler

Engineer II

Energy Delivery Transmission and Substation Design

FirstEnergy Service Company

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Case No(s). 16-0257-EL-BLN

Summary: Notice of Filing of Supplemental Information electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc.