

January 11, 2019

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

Letter of Notification
Chrysler-Maclean 138 kV Transmission Line
Tap to First Solar Project
Case No. 18-1681-EL-BLN

Dear Ms. McNeal,

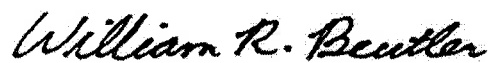
This letter provides supplemental information to the Board concerning the Chrysler-Maclean 138 kV Transmission Line Tap to First Solar Project, Case No. 18-1681-EL-BLN. The letter of notification application was filed with the Board on December 31, 2018 and is currently pending. Applicant request that the supplemental information included with this letter be considered as part of the review of application. The supplemental information is as follows:

1. ODNR has responded to ATSI's request for comments on this Project. The ODNR's letter is included as Attachment 1. ODNR did not identify any additional endangered and threatened species, and for the species previously identified ODNR found the Project not likely impact the species.
2. GAI Consultants Inc. completed a preliminary access plan for the Project. A copy of the access plan is provided in Attachment 2. FirstEnergy's Forestry Group has identified several areas where tree clearing is necessary, if the Project is approved. All tree clearing will be completed as described in the application.

No changes to the Project as described in the application are necessary as a result of this additional information.

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, P.E.
Engineer III
Energy Delivery Transmission and Substation Design
FirstEnergy Service Company

cc: J. O'Dell

**Chrysler-Maclean 138 kV Transmission Line Tap to First Solar Project
Case Number 18-1681-EL-BLN**

**Attachment 1
ODNR Comment Letter**



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldrige, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

January 9, 2019

William Beutler
FirstEnergy
76 South Main Street
Akron, Ohio 44308

Re: 18-1241; Chrysler-Maclean 138kV Line Tap to First Solar Substation

Project: The proposed project involves the construction of approximately 1.84 miles of a new transmission tap line to be located within an approximately 60-foot-wide corridor

Location: The proposed project is located in Lake and Perrysburg Townships, Wood 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: The Natural Heritage Database has no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. 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. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

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 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 project is within the range of the pondhorn (*Uniomerus tetralasmus*), a state threatened mussel. 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 this species.

The project is within the range of the western banded killifish (*Fundulus diaphanatus menona*), a state endangered fish. The DOW recommends no in-water work in perennial streams from April 15 to 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 this or other aquatic species.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the type of habitat at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus cyaneus*), 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 May 15 to August 1. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after

their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to June 30. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. 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 should 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, this project is not likely to impact this species.

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

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

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

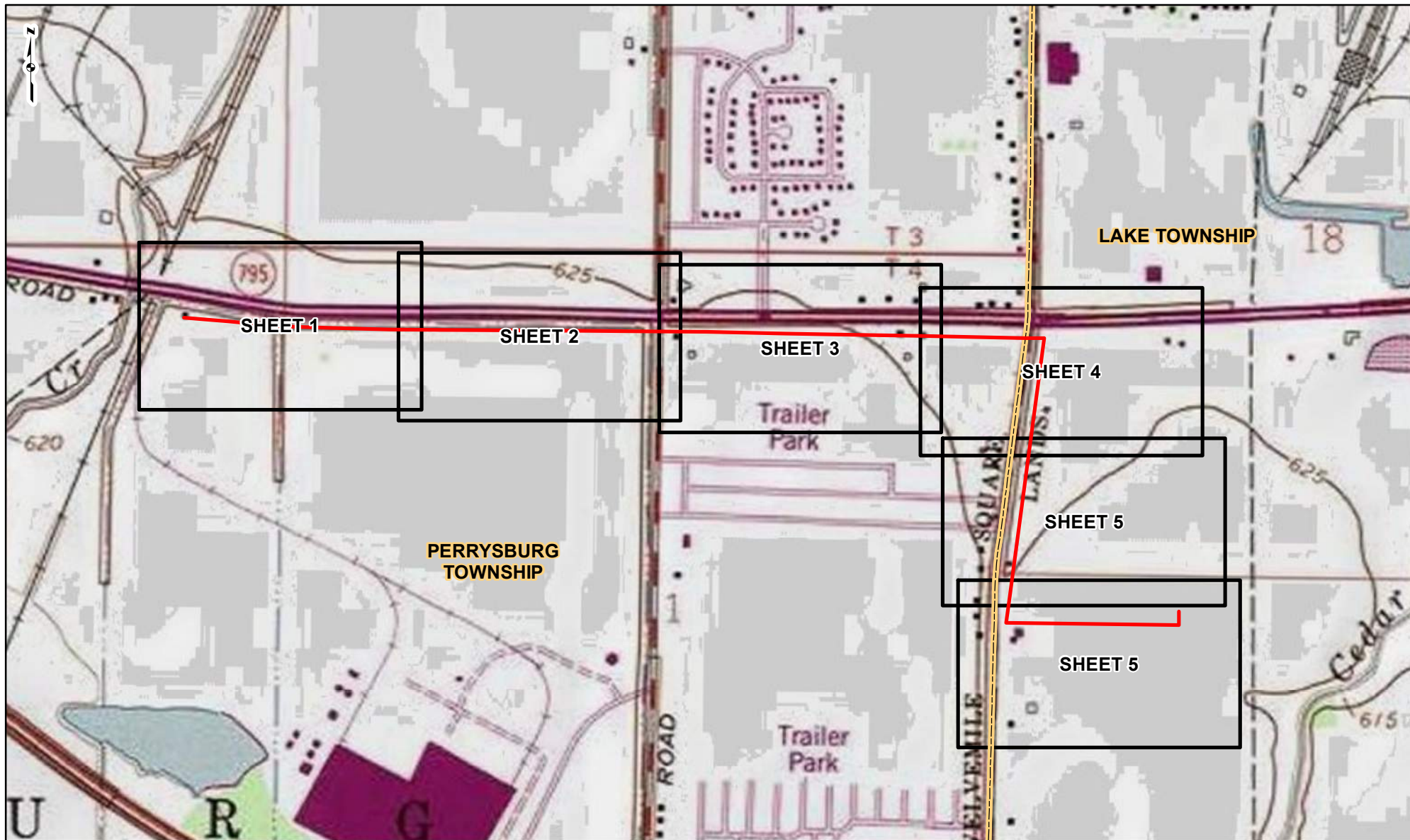
http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

John Kessler
Environmental Services Administrator

**Chrysler-Maclean 138 kV Transmission Line Tap to First Solar Project
Case Number 18-1681-EL-BLN**

**Attachment 2
Access Road Map**



PROJECT LOCATION

WOOD COUNTY, OHIO

REFERENCE: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ROSSFORD (1980) AND WALBRIDGE (1980), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 01/2019.

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LEGEND

- ROUTE ALIGNMENT
- SHEET INDEX
- MUNICIPAL BOUNDARY

0 500 1,000 2,000 Feet

ORTHO MAP SHEET INDEX

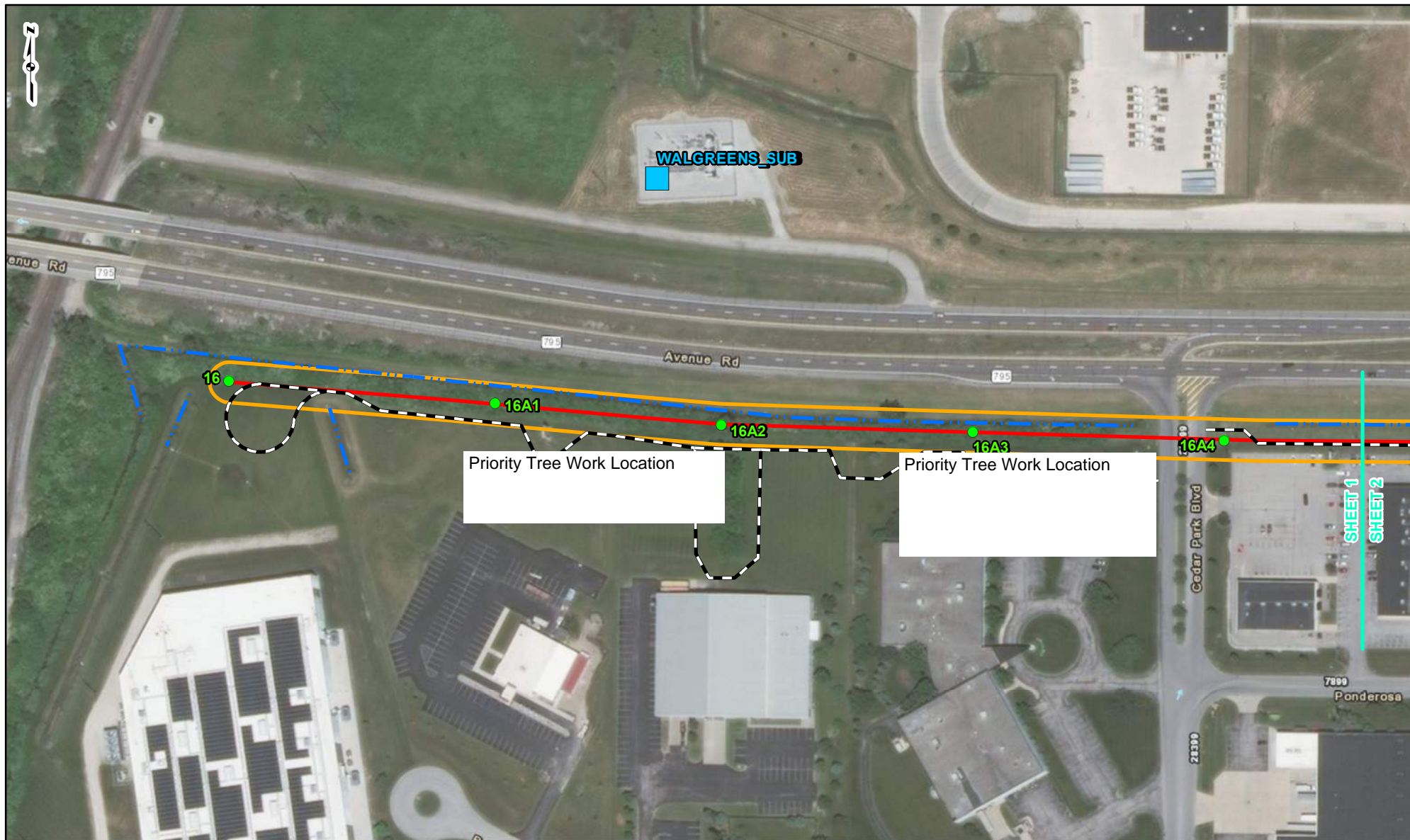
CHRYSLER-MACLEAN 138 kV LINE TAP TO FIRST SOLAR SUBSTATION
AMERICAN TRANSMISSION SYSTEMS INCORPORATED (ATSI)

gai consultants

DRAWN BY: AEK
CHECKED: TDB

DATE: 1/3/2019
APPROVED: LJP

ATSI
American Transmission Systems, Incorporated
a member of the AES family



PROJECT LOCATION



WOOD COUNTY, OHIO

REFERENCE: ESRI WORLD IMAGERY, DIGITALGLOBE, 2017, ACCESSED 01/2019. WORLD TRANSPORTATION, ESRI, DELORME, HERE, MAPMYINDIA, TOMTOM, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY, OBTAINED THROUGH ESRI ARCGIS ONLINE, ACCESSED 01/2019.

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LEGEND

- PROPOSED STRUCTURE
- SUBSTATION
- DRAINAGE FEATURE
- ROUTE ALIGNMENT
- PROPOSED ACCESS ROAD
- OPEN-ENDED BOUNDARY
- ▨ STORMWATER POND
- RIGHT-OF-WAY

0 100 200 400 Feet

ORTHO MAP SHEET 1 OF 6

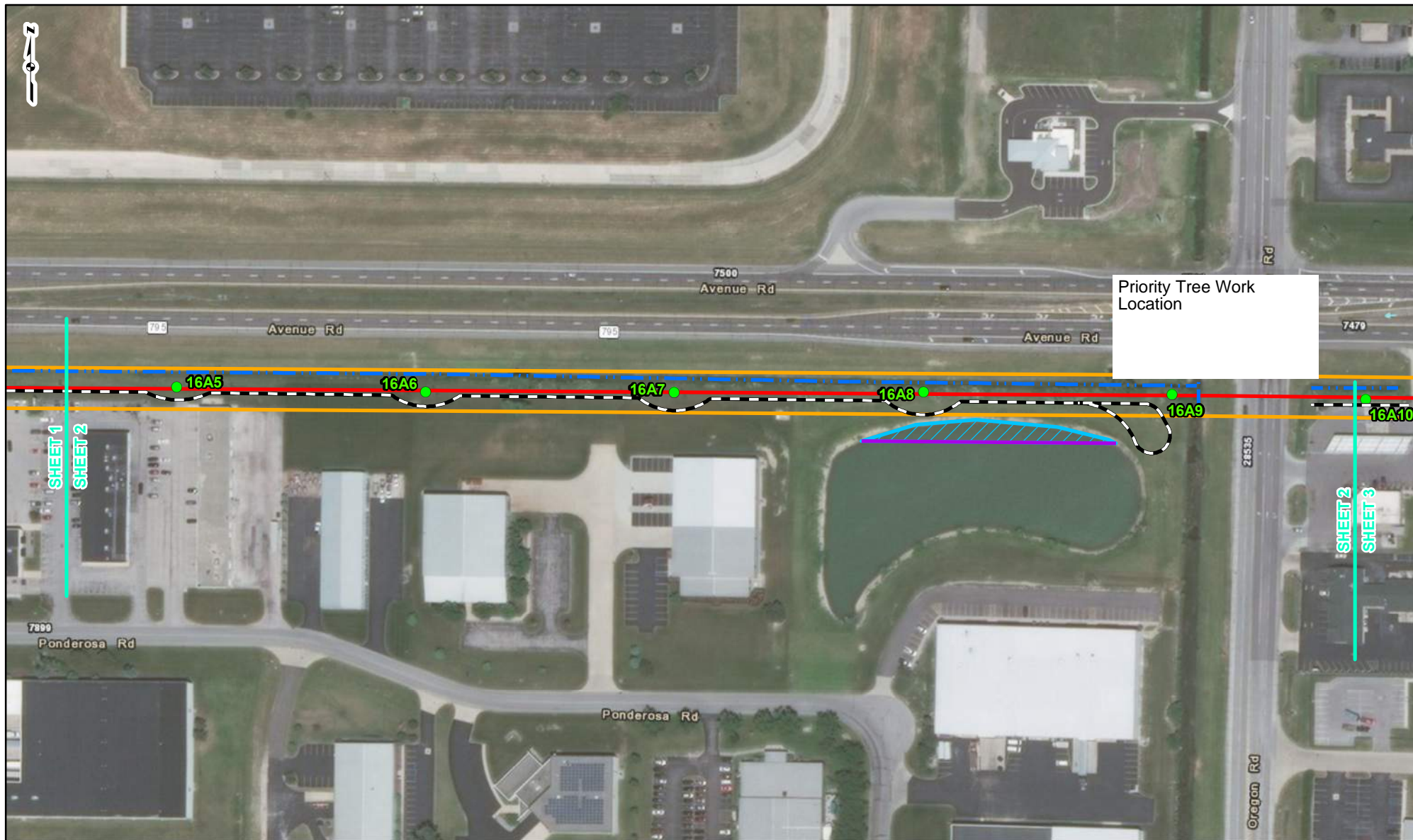


CHRYSLER-MACLEAN 138 KV LINE TAP
TO FIRST SOLAR SUBSTATION
AMERICAN TRANSMISSION SYSTEMS
INCORPORATED (ATSI)



DRAWN BY: AEK
CHECKED: TDB

DATE: 1/4/2019
APPROVED: LJP



PROJECT LOCATION



WOOD COUNTY, OHIO

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- ▭ RIGHT-OF-WAY

0 100 200 400 Feet

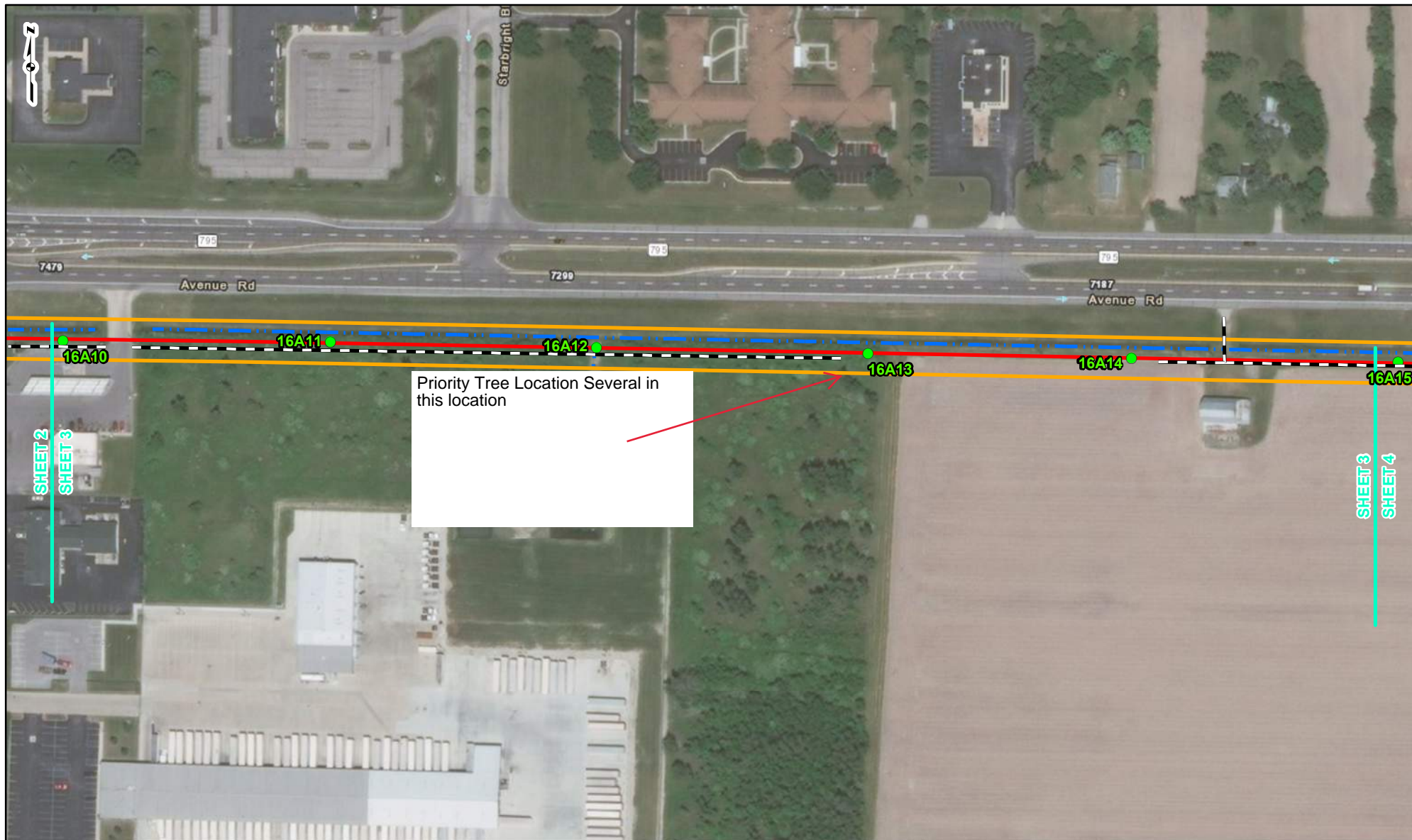
ORTHO MAP SHEET 2 OF 6

CHRYSLER-MACLEAN 138 KV LINE TAP
TO FIRST SOLAR SUBSTATION
AMERICAN TRANSMISSION SYSTEMS
INCORPORATED (ATSI)



gai consultants
DRAWN BY: AEK
CHECKED: TDB

DATE: 1/4/2019
APPROVED: LJP



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| SUBSTATION | OPEN-ENDED BOUNDARY |
| DRAINAGE FEATURE | STORMWATER POND |
| ROUTE ALIGNMENT | RIGHT-OF-WAY |

0 100 200 400 Feet

ORTHO MAP
SHEET 3 OF 6

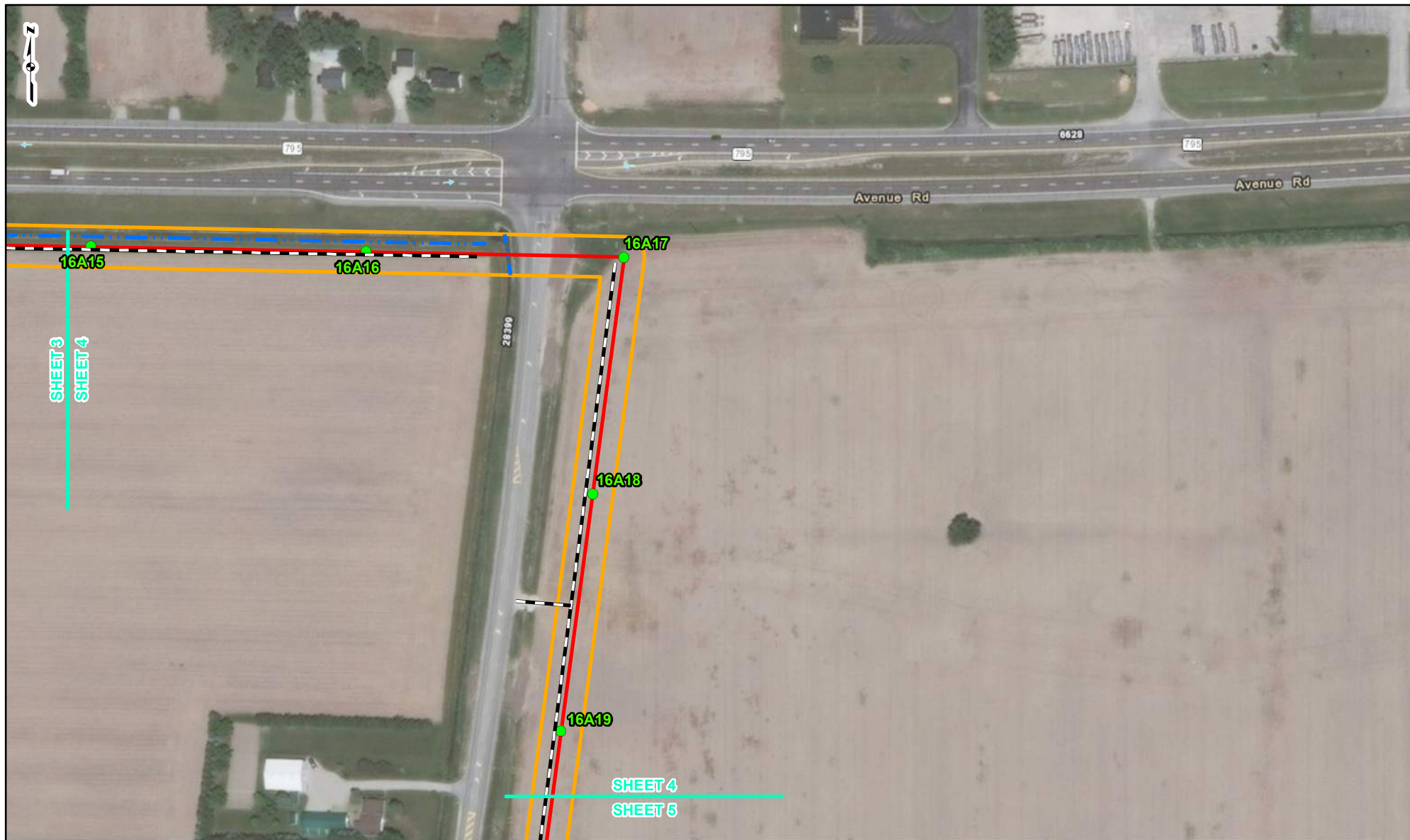


CHRYSLER-MACLEAN 138 KV LINE TAP
TO FIRST SOLAR SUBSTATION
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- ▭ RIGHT-OF-WAY

0 100 200 400 Feet

ORTHO MAP SHEET 4 OF 6



CHRYSLER-MACLEAN 138 KV LINE TAP
TO FIRST SOLAR SUBSTATION
AMERICAN TRANSMISSION SYSTEMS
INCORPORATED (ATSI)



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WOOD COUNTY, OHIO

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LEGEND

● PROPOSED STRUCTURE	— PROPOSED ACCESS ROAD
■ SUBSTATION	— OPEN-ENDED BOUNDARY
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— ROUTE ALIGNMENT	▭ RIGHT-OF-WAY

0 100 200 400 Feet

**ORTHO MAP
SHEET 5 OF 6**

CHRYSLER-MACLEAN 138 KV LINE TAP
TO FIRST SOLAR SUBSTATION
AMERICAN TRANSMISSION SYSTEMS
INCORPORATED (ATSI)

gai consultants **ATSI**

DRAWN BY: AEK DATE: 1/4/2019
CHECKED: TDB APPROVED: LJP



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0 100 200 400 Feet

ORTHO MAP SHEET 6 OF 6



CHRYSLER-MACLEAN 138 kV LINE TAP
TO FIRST SOLAR SUBSTATION
AMERICAN TRANSMISSION SYSTEMS
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DATE: 1/4/2019
APPROVED: LJP

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Case No(s). 18-1681-EL-BLN

Summary: Correspondence Submitting Supplemental Information to the Board electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc.