

FILE

January 17, 2019

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

**Application for a Certificate of Environmental Compatibility and Public Need  
Wood County 138-kV Reinforcement Project  
Case No. 18-1335-EL-BTX**

Dear Ms. McNeal,

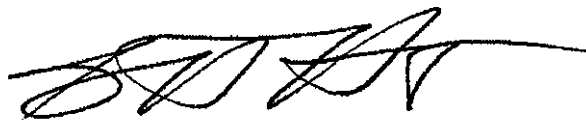
This letter provides supplemental information to the Board for inclusion in the application filed with the Board for the Wood County 138 kV Reinforcement Project, Case No. 18-1335-EL-BTX.

As stated in the application, ATSI requested comments from the Ohio Department of Natural Resources ("ODNR") on this Project. ODNR has responded to ATSI's request for comments by letter which is included as Attachment 1. ODNR did not identify any additional threatened or endangered species other than those already included in the application. ODNR has concluded that the Project is not likely to impact any threatened or endangered species.

Consequently, no changes to the Project result from this additional information.

Should the Ohio Power Siting Board desire further information or discussion of this submittal, please contact me at 330-384-2526.

Sincerely,



Scott M. Humphrys  
Transmission Siting Supervisor  
Energy Delivery Transmission and Substation Design  
FirstEnergy Service Company

RECEIVED-DOCKETING DIV  
2019 JAN 22 PM 2:40  
PUCO  
cc: J. O'Dell

This is to certify that the figures appearing are as  
accurate and complete as possible and that the  
documents delivered to the Public Utilities Commission  
Technician A Date 1/22/19



# Ohio Department of Natural Resources

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JOHN R. KASICH, GOVERNOR

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JAMES ZEHRINGER, DIRECTOR

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**Office of Real Estate**

*Paul R. Baldridge, Chief*

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January 7, 2019

Ann Schweitzer  
GPD Group  
1801 Watermark Drive, Suite 210  
Columbus, Ohio 43215

**Re:** 18-1222; Wood County 138kv Reinforcement Project

**Project:** The proposed project involves the construction of the Wood County 138kV Reinforcement Project to enhance electrical service within the county.

**Location:** The proposed project is located in Middleton Township, 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 the following record at or within a one-mile radius of the project area:

Bushy horseweed (*Conyza ramosissima*), State potentially threatened

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. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

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 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 laciniata*), 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 (*Unio merus 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, this project is not likely to impact these 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. Due to the location, the type of habitat at the project site, and the type of work proposed, 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 leaves the nest. Due to the location, the type of habitat at the project site, and the type of work proposed, 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). Due to the location, the type of habitat at the project site, and the type of work proposed, 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](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](mailto:Sarah.Tebbe@dnr.state.oh.us) if you have questions about these comments or need additional information.

John Kessler  
Environmental Services Administrator