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March 19, 2001

Dr. Leon Winget Power Siting Coordinator Ohio Power Siting Board Public Utilities Commission of Ohio Borden Building 180 East Broad Street Columbus, Ohio 43266-0573

Subject:

General Motors-Longview 138 kV Tap to Cairns Substation

OPSB Case No. 41-2463-EL-BLN

Proposed Revegetation Plan & Status of Mitigation Activities

Dear Dr. Winget,

Enclosed for the OPSB Staff's review and comment is ATSI's Revegetation Plan on the General Motors-Longview 138 kV Tap to Cairns Substation project. I believe the Revegetation Plan compliments the anticipated natural regrowth of vegetation in the project area and includes the appropriate check and commitment for additional plantings at the end of the growing season if the anticipated regrowth does not occur. Additional vegetation will be planted in the spring in those areas along the two intermittent streams that previously had limited vegetative cover. In the fall, the vegetation will be inspected and a report submitted to the OPSB, which will include recommendations as appropriate for additional plantings. Please let me know if the Revegetation Plan meets the Staff's expectations.

I also wanted to take this opportunity to provide an up to date summary of the mitigation activities on the project that we have discussed in several phone conversations over the past several weeks.

1. Wetland delineation:

URS Corporation was retained to perform the Wetland Delineation of the project area. They were at the project site on March 12, 2001 and conducted a Phase I Preliminary Wetlands Evaluation. They found no jurisdictional wetlands in the right-of-way, and indicated that they believe it is not necessary to conduct a formal wetland delineation. I anticipate providing a copy of their final report to the OPSB Staff by March 23, 2001.

2. Silt fences:

Installation of the silt fences adjacent and parallel to both sides of the two intermittent streams in the right-of-way was completed on March 2, 2001.

3. Seeding and Mulching:

The seeding and mulching was delayed due to snowfall at the project site. The installation of the seeding and mulch was completed on March 16, 2001.

4. Revegetation Plan:

The proposed Revegetation Plan is attached and calls for additional plants to be made along the streams prior to May 15, 2001.

Please contact me at (330) 761-4268 if you have any questions regarding this information.

Sincerely,

Ted Krauss, Staff Engineer

Transmission Regulatory Affairs

General Motors-Longview 138 kV
Tap to Cairns Substation
OPSB Case No. 01-2463-EL-BLN
Revegetation Plan
March 19, 2001

00-2463-86-BLN

Purpose

This Revegetation Plan provides the detailed plan for revegetation of areas on the right-of-way of the General Motors-Longview 138 kV Tap to Cairns Substation described in the March 1, 2001 Memorandum of Commitment Regarding Mitigation Activities on the project. The plan is being submitted to the Ohio Power Siting Board Staff for their review and comment prior to implementing the plan.

Background

The Memorandum of Commitment provided the following description of the revegetation activities:

4. A vegetative cover shall be planted covering not less than a 25-foot zone on each side of the two intermittent streams. The planting shall consist of shrubs and trees that are compatible with both a riparian corridor and the overhead electric transmission line. The plantings shall be made after the transmission line is installed, preferably in the spring but no later than the fall of 2001, based on weather conditions and stock availability. Applicant shall provide a detailed plan for revegetation of the affected areas on each side of the two intermittent streams as well as for any delineated wetlands in the previously cleared portion of the right-of-way for Staff review and comment prior to implementation of such plan.

URS Corporation conducted a Phase I Preliminary Wetlands Evaluation of the right-of-way of the General Motors-Longview 138 kV Tap to Cairns Substation on March 12, 2001. Jurisdictional wetlands were not found within the right-of-way, and therefore the revegetation plan does not call for revegetating any wetland areas.

Scope of Work

Based on the experience of FirstEnergy's forestry staff on right-of-way construction and maintenance activities in the region, we anticipate that the existing vegetation will quickly resprout in the spring. This should quickly reestablish vegetation along both sides of the two intermittent streams in the right-of-way. The Revegetation Plan has been developed to

compliment this anticipated natural growth. However, the Revegetation Plan also includes provisions to evaluate the natural growth process and to propose and plant additional plants if necessary. Revegetation Plan activities are divided into Phase I and Phase II tasks. Phase I tasks will take place during the spring of 2001 and Phase II activities will take place during the fall of 2001. In addition to the work described here, the area along each stream is being seeded and mulched to control erosion during construction activities.

Phase I Activities:

In areas where we think that the existing vegetation was light to begin with along the two streams, we will install bare-root Kousa Dogwood seedlings. The seedlings will be planted at a random spacing within the 25-foot wide zone on both sides of the two intermittent streams within the right-of-way. We anticipate that a total of approximately 50 seedlings will be planted, with at least 10 seedlings being planted on each side of the two streams. The Phase I planting activities will be completed by May 15, 2001.

Phase II Activities:

In September 2001, the vegetation within 25-foot zone on each side of the two intermittent streams will be inspected and a report developed which describe the status of the vegetation. If the vegetation within the 25-foot zone is not similar to vegetation along similar streams in the region or otherwise deficient, the report will include a proposal for additional plantings. Any additional plantings will be installed no later than November 2001. The report will be submitted to the Ohio Power Siting Board for their review and comment.