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Garrett P. Lent

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File #: 214876

November 14, 2025

***VIA ELECTRONIC FILING***

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**Re: Letter of Notification of Mid-Atlantic Interstate Transmission, LLC for Approval of the Hilltop–Krayn–Rachel Hill 115 Kilovolt Transmission Line Reconfiguration Project in Richland Township, Cambria County, Pennsylvania  
Docket No. A-2025-\_\_\_\_\_**

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Dear Secretary Homsher:

Enclosed for filing on behalf of Mid-Atlantic Interstate Transmission, LLC (“MAIT”) is a Letter of Notification (“LON”), requesting approval for the Hilltop–Krayn–Rachel Hill 115 Kilovolt (“kV”) Transmission Line Reconfiguration Project (“Project”). This LON is being filed pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 57.72(d). Copies of this LON have been served upon the parties as required by 52 Pa. Code § 57.74 and noted on the attached Certificate of Service.

Subject to the Commission’s approval, the Project has a scheduled construction date of April 6, 2026, to meet an in-service date of May 22, 2026. To support this construction timeline, MAIT respectfully requests the Commission’s review and approval of the LON on or before the March 26, 2026, Public Meeting in order to allow construction to commence immediately thereafter.

If you have any questions pertaining to this matter, please do not hesitate to contact me.

Respectfully submitted,



Garrett P. Lent

GPL/dmc

Matthew Homsher, Secretary  
November 14, 2025  
Page 2

Enclosure

cc: Deb Backer Bureau of Technical Utilities (*via email; w/attachment*)  
Jordan Van Order Bureau of Technical Utilities (*via email; w/attachment*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Notification has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 57.72(d)(3).

### VIA CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101-1923

Ms. Andrea Lowery, Executive Director  
Pennsylvania Historical & Museum  
Commission  
300 North Street  
Harrisburg, PA 17120-0024

Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor Forum Place  
Harrisburg, PA 17101

Scott Hunt, Chair  
Cambria County Commissioner  
200 south Center St.  
Ebensburg, PA 15931

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Thomas C. Chemisky  
Cambria County Commissioner  
200 south Center St.  
Ebensburg, PA 15931

PA Department of Environmental Protection  
ATTN: Office of Chief Counsel  
400 Market St., 9th Floor  
Harrisburg, PA 17105  
CC: Secretary to PADEP Chief Counsel

Robert Heffelfinger  
Richland Township President  
322 Schoolhouse Rd  
Johnstown, PA 15904

PA Department of Environmental Protection  
ATTN: Bureau of Waterways Engineering  
and Wetlands  
400 Market Street  
Harrisburg, PA 17101

Keith Rager  
Cambria County Commissioner  
200 south Center St.  
Ebensburg, PA 15931

Office of Chief Counsel Real Property  
Division  
Pennsylvania Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 9th Floor  
Harrisburg, PA 17120

Mark Lazzari, Director  
Cambria County Planning  
401 Candlelight Dr., Suite 215  
Ebensburg, PA 15931

Gary Paul  
Richland Township Supervisor  
322 Schoolhouse Rd  
Johnstown, PA 15904

Jeffrey Wingard  
Richland Township Supervisor  
322 Schoolhouse Rd  
Johnstown, PA 15904

Keith Saylor  
Richland Township Supervisor  
322 Schoolhouse Rd  
Johnstown, PA 15904

Brian Lehman  
Richland Township Supervisor  
322 Schoolhouse Rd  
Johnstown, PA 15904

John Dryzal, District Manager  
Cambria County Conservation District  
401 Candlelight Dr. Suite 229  
Ebensburg, PA 15931

Johnstown Cambria Co Airport Authority  
479 Airport Rd  
Johnstown, Pa 15904

Richland Township Fire Department  
1321 Scalp Ave  
Johnstown, Pa 15904

Donald Mattis  
179 Mount Airy Drive  
Johnstown, Pa 15904

Berwind Corp.  
509 15<sup>th</sup> St.  
Windber, Pa 15963

Pennsylvania Department of Conservation  
and Natural Resources  
400 Market St.  
Harrisburg, PA 17105

Pennsylvania Game Commission  
2001 Elmerton Ave.  
Harrisburg, PA 17110-9797

Pennsylvania Fish and Boat Commission  
1601 Elmerton Ave.  
Harrisburg, PA 17110

US Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, Pennsylvania 16801-4850

Date: November 14, 2025



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Garrett P. Lent

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LETTER OF NOTIFICATION OF :  
MID-ATLANTIC INTERSTATE :  
TRANSMISSION, LLC FOR :  
APPROVAL OF THE HILLTOP- :  
KRAYN-RACHEL HILL 115 : Docket No. \_\_\_\_\_  
KILOVOLT TRANSMISSION LINE :  
RECONFIGURATION PROJECT IN :  
RICHLAND TOWNSHIP, CAMBRIA :  
COUNTY, PENNSYLVANIA :**

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**LETTER OF NOTIFICATION**

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To the Pennsylvania Public Utility Commission:

Pursuant to 52 Pa. Code §§ 57.72(d)(1)(i) and (vi), Mid-Atlantic Interstate Transmission, LLC (“MAIT” or “Company”) submits this Letter of Notification (“LON”) requesting that the Pennsylvania Public Utility Commission (“Commission”) approve the Hilltop–Krayn–Rachel Hill 115 Kilovolt (“kV”) Transmission Line Reconfiguration Project (“Project”) as described herein.

The proposed Project was developed to address an aging existing air switch by replacing the existing switch with a new Supervisory Control and Data Acquisition (“SCADA”) operated switch. The Project will also require the replacement of two existing H-frame structures and the addition of one H-frame structure on the Hilltop–Krayn–Rachel Hill 115 kV Transmission Line in existing MAIT right-of-way (“ROW”).

The Project will be constructed in Richland Township, Cambria County, Pennsylvania. MAIT has provided information regarding this Project to all identified political subdivisions, and none of them have objected to the Project. Subject to the Commission’s approval, construction on

the Project is scheduled to begin on or about April 6, 2026, to meet an in-service date of May 22, 2026. To support the construction timeline, MAIT respectfully requests that the Commission issue its final ruling by the Public Meeting scheduled for March 26, 2026.

In support thereof, MAIT submits as follows:

**I. INTRODUCTION**

1. MAIT is a public utility subject to the jurisdiction of the Commission over the siting and construction of transmission lines pursuant to Chapter 57, Subchapter G, of the Commission's regulations.

2. The address of MAIT's principal business office is:

Mid-Atlantic Interstate Transmission, LLC  
341 White Pond Drive  
Akron, OH 44320

3. The attorneys representing MAIT in this matter authorized to receive notices and communications on its behalf are:

Tori Giesler  
Attorney ID #207742  
FirstEnergy Service Company  
341 White Pond Drive  
Akron, OH 44320  
(610) 921-6658  
Email: [tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

David B. MacGregor (ID #28804)  
Garrett P. Lent (ID #321566)  
Megan Rulli (ID # 331981)  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
(717) 731-1970  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

mrulli@postschell.com

MAIT agrees to accept electronic service in this proceeding.

4. MAIT also requests that a copy of all notices and communications regarding this matter be sent to:

Michael DeSarro  
Transmission Specialist II  
FirstEnergy Service Company  
341 White Pond Drive  
Akron, OH 44320  
(330)384-3721  
madesarro@firstenergycorp.com

5. MAIT provides the following attached exhibits in support of this LON:
- **Exhibit 1:** A topographic map depicting the location of the proposed Project;
  - **Exhibit 2:** An overview depicting the general layout of the Project;
  - **Exhibit 3:** A depiction of the general configuration for a 115 kV single circuit tubular steel unitized 2000A Switch Structure;
  - **Exhibit 4:** A depiction of the general configuration for a 115 kV single circuit light duty steel/ductile iron pole structure suspension horizontal two pole H-Frame Structure;
  - **Exhibit 5:** A copy of the Wetland and Stream Delineation Report prepared by Civil and Environmental Consultants, dated March 2025;
  - **Exhibit 6:** A copy of the Pennsylvania Natural Diversity Inventory review, dated December 31, 2024, and related agency clearance correspondence; and
  - **Exhibit 7:** Copies of the Pennsylvania State Historic Preservation Office clearance letters, dated January 21, 2025.

6. This Letter of Notification and accompanying Exhibits, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

## **II. THE PROJECT**

### **A. NEED FOR THE PROJECT**

7. As explained in further detail below, the proposed Project is needed to address an aging existing switch on the existing Hilltop–Krayn–Rachel Hill 115 kV Transmission Line.

## 1. Existing System

8. The existing Hilltop–Krayn–Rachel Hill 115 kV Transmission Line consists of 636 kcmil 24/7 ACSR<sup>1</sup> “Rook” conductor and 3/8-7 strand EHS<sup>2</sup> steel static wire. The existing structures in the area of the Project range from approximately 50 to 70 feet tall and are direct imbedded, wood H-frame structures.

9. A map of the existing system configuration is provided as **Exhibit 2**.

## 2. Identification of Need

10. The proposed Project is needed because an air switch on the Hilltop–Krayn–Rachel Hill 115 kV Transmission Line has an obsolete design that no longer meets present standards and is no longer supported for repair parts. The last attempted maintenance on the switch occurred in 2023, but was unsuccessful due to the switch’s age and current condition. This attempt followed a failure and previous repair in 2021. In addition, the H-frame wood pole structure housing the air switch will continue to subject this non-unitized switch to shrinkage and deflection over time, resulting in diminished reliability. In consultation with the Company’s Engineering and Regional Operations, the combination of unavailability of parts, operational history, and continued changes in structure integrity all indicate that attempts to prolong service would be temporary at best, or unsuccessful. The expected cost of future maintenance and reliability implications do not justify repairs, and the switch should be retired. MAIT therefore proposes replacing both the structure and the switch, using an improved unitized design that meets present engineering standards, while adding a remotely controlled motor operator for enhanced system flexibility and personal safety.

11. MAIT considered two alternatives in addition to the recommended switch replacement solution. The first alternative solution was to continue operating the obsolete switch

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<sup>1</sup> Aluminum Conductor Steel Reinforced.

<sup>2</sup> Extra high strength.

and perform regular maintenance and repair. This solution was not chosen due to the implied risk of future operational failure. The second alternative solution was to remove the switch from the existing transmission line without replacement. This alternative solution was not chosen as it would create an unacceptable sectionalizing scheme that would put system load at risk. The transmission line serves 8,500 customers with 25 megawatts (“MW”) of load. Not replacing the switch would limit the Company's operational switching in the area during outage scenarios.

12. MAIT considered one alternative to the replacement of existing Structure #3 and installation of Structure #3A. The alternative considered was to take no action. This alternative solution was not chosen due to the issue of Phase-Raised structures. Existing Structure #3 is being replaced as part of the effort to eliminate existing “Phase-Raised” structures. Phase-Raised structures exhibit increased pole rot and decay because of the exposure from the process of cutting the pole to install the phase-raise materials. Also, Phase-Raised poles induce uneven loading on the structures and create an additional vulnerable interface on the structure. These issues will continue to worsen with time. Failing to install Structure #3A would create a conductor-to-ground criteria violation between Structure #3 and Structure #4.

## **B. THE PROPOSED PROJECT**

13. The proposed Project will replace the existing switch, located on existing Structure #2, with a new SCADA-operated 2000A switch.

14. The proposed Project will be located entirely within the existing MAIT 100-foot-wide ROW. The existing easements allow for installation of the proposed structure replacements and additions. No new ROW or easements are required to complete the Project.

15. A depiction of the general location of the Project is provided in **Exhibit 1**. A depiction of the general layout for the Project is provided in **Exhibit 2**.

16. To facilitate the proposed switch replacement, existing Structure #2, which is approximately 70 feet tall, will be replaced. The proposed new Structure #2 will be installed approximately 183 feet to the north on property owned by FirstEnergy Pennsylvania Electric Company (“FE PA”), formerly Pennsylvania Electric Company.<sup>3</sup> The new structure will be a single circuit tubular steel switch structure on a concrete foundation, with an above-ground height of approximately 76 feet, as shown in **Exhibit 3**.

17. Existing Structure #3, which is approximately 70 feet tall, will be replaced with a suspension H-frame direct embedded steel pole structure approximately 75 feet north of its current location on the same property. In addition, a new midspan suspension H-frame direct embed steel pole structure, Structure #3A, will be installed on the same property, approximately 363 feet south of existing Structure #3. Structures #3 and #3A will have above-ground heights between 64 and 84 feet, as shown in **Exhibit 4**.

18. The existing conductor will be transferred to the new structures. Approximately 183 feet of new 636 kcmil 24/7 ACSR “Rook” conductor 3/8-7 strand EHS steel static wire will be needed to splice new Structure #2 to the existing transmission line.

19. All transmission lines will be owned, operated, and maintained by MAIT. The estimated transmission line cost is approximately \$608,300.

20. Advanced transmission technologies are being implemented as a part of this Project to address the identified needs. Specifically, a SCADA switch will replace the existing, obsolete, air switch. SCADA switches offer significant advantages over traditional air switches, primarily due to their enhanced remote control, monitoring, and automation capabilities. SCADA systems

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<sup>3</sup> On December 7, 2023, the Commission approved, among other things, the merger of FirstEnergy’s Pennsylvania operating companies, including Metropolitan Edison Company (“Met Ed”), into FirstEnergy Pennsylvania Electric Company (“FE PA”). The merger transaction closed January 1, 2024. FE PA is now the successor in interest to Pennsylvania Electric Company.

allow for real-time data collection and analysis, enabling remote monitoring of multiple devices, troubleshooting problems, and controlling equipment from anywhere. Air switches, while simple, lack these advanced features and are typically manually operated.

### **III. HEALTH AND SAFETY**

21. The proposed lines will not create any unreasonable risk of danger to public health or safety. The Project will be designed to meet or exceed all requirements of the latest revision of the National Electrical Safety Code (“NESC”) under all operating conditions as well as FirstEnergy’s current design criteria.

22. FirstEnergy’s design criteria require that 115 kV transmission lines have a designed vertical conductor-to-ground clearance of 26 feet. This design value exceeds the NESC minimum of 20.2 feet by a margin of 5.8 feet. In general, FirstEnergy’s clearance criteria exceed the NESC minimums by various margins ranging from two feet to seven feet, depending on the voltage and specific clearance measurement. The transmission line’s maximum operating temperature will be 212 degrees Fahrenheit.

23. The design, construction, and operation of the Project will meet or exceed all applicable safety standards established by the Occupational Safety and Health Administration (“OSHA”). Moreover, the Project will be constructed in accordance with the Company’s standard construction practices to perform all work safely. All work will be performed in accordance with NESC, OSHA, and all other applicable state and federal requirements.

#### **IV. DESCRIPTION OF RIGHT OF WAY**

24. The proposed Project will be located entirely within existing MAIT ROW. The Project will maintain the existing centerline in the ROW.

25. The proposed structures will be placed along the centerline of the existing Hilltop-Krayn-Rachel Hill 115 kV Transmission Line.

26. Existing MAIT easements allow for the proposed structure replacements and the proposed additional structure. No new structures are proposed to be located on properties that do not currently have a structure. One additional structure will be added to parcel number 50-004-162.000, as shown in **Exhibit 2**. MAIT has discussed this additional structure with the affected landowner, Berwind Corp. The customer has no objections or concerns with the additional structure. No new ROW or easements are required to complete the Project. MAIT will coordinate with all affected landowners for temporary access to support construction, as needed.

#### **V. LAND USE AND ENVIRONMENTAL EVALUATION**

27. As explained above, construction of the proposed Project will take place entirely within the existing ROW.

28. A field review for wetlands and streams in the Project Area was conducted by Civil and Environmental Consultants, Inc (“CEC”). **Exhibit 5** is a copy of the wetland and stream delineation report for the Project, dated March 2025. No streams, wetlands, or other waters were identified within the delineation boundary.

29. A site-specific Erosion and Sediment (“E&S”) Plan will need to be approved for the Project. The E&S Plan requires approval from the Cambria County Conservation District. The pole construction, workspaces, and access roads are included in the E&S Plan. No Pennsylvania Chapter 105 permits will be required to complete the Project. The U.S. Fish and Wildlife Service

(“USFWS”), the PA Game Commission (“PGC”), PA Department of Conservation and Natural Resources (“PADCNR”), and the PA Fish and Boat Commission (“PFBC”) have concluded that no impacts to protected resources are anticipated from construction of the Project, based on the PNDI review, dated December 31, 2024. A copy of the PNDI review is attached as **Exhibit 6**.

30. In addition, the Project Area was submitted to the Pennsylvania Historical Society Office (“SHPO”) for review. In a response letter dated January 21, 2025, SHPO recommended “no effect” concerning both above ground and archaeological resources. A copy of this correspondence is included as **Exhibit 7**.

## **VI. NOTICE**

31. MAIT has provided information regarding the Project to representatives of Richland Township and Cambria County. These entities have not objected to the proposed Project. Copies of the Letter of Notification will be served upon all state agencies, federal agencies, county agencies, municipalities, and landowners in accordance with 52 Pa. Code § 57.72(d)(3).

## **VII. LETTER OF NOTIFICATION**

32. MAIT is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission’s regulations at 52 Pa. Code § 57.72(d)(1)(i).

33. The proposed Project involves the replacement of two transmission line structures and the addition of one transmission line structure on an existing transmission line within an existing transmission line ROW. As such, the proposed Project qualifies for use of a Letter of Notification because it will be an HV line which is proposed to be located entirely within the applicant’s existing transmission line ROW. *See* 52 Pa. Code § 57.72(d)(1)(i). In addition, the

Project qualifies for a Letter of Notification because it consists of an HV line with a proposed route of 2 miles or less. *See* 52 Pa. Code § 57.72(d)(1)(vi).

34. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, et seq.

WHEREFORE, Mid-Atlantic Interstate Transmission, LLC respectfully requests that the Commission review and approve the proposed Hilltop–Krayn–Rachel Hill 115 Kilovolt Transmission Line Reconfiguration Project in Richland Township, Cambria County, Pennsylvania, which is explained above and in the Exhibits attached hereto, on or before March 26, 2026.



Tori L. Giesler (ID #207742)  
FirstEnergy Service Company  
341 White Pond Drive  
Akron, OH 44320  
Phone: (610) 921-6658  
Email: [tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

David B. MacGregor (ID #28804)  
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E-mail: [glent@postschell.com](mailto:glent@postschell.com)  
Email: [mrulli@postschell.com](mailto:mrulli@postschell.com)

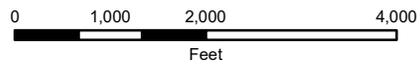
Date: November 14, 2025

Attorneys for Mid-Atlantic Interstate  
Transmission, LLC

# **EXHIBIT 1**

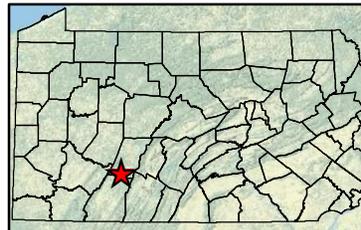


LEGEND:  
 Project Area



**Reference:**  
 USGS Topographical Overlay; PennDOT, PADCNR PAMAP

**Coordinate System:**  
 NAD\_1983\_StatePlane\_Pennsylvania\_North\_FIPS\_3701\_Feet  
 WKID: 2271 Authority: EPSG



## EXHIBIT 1

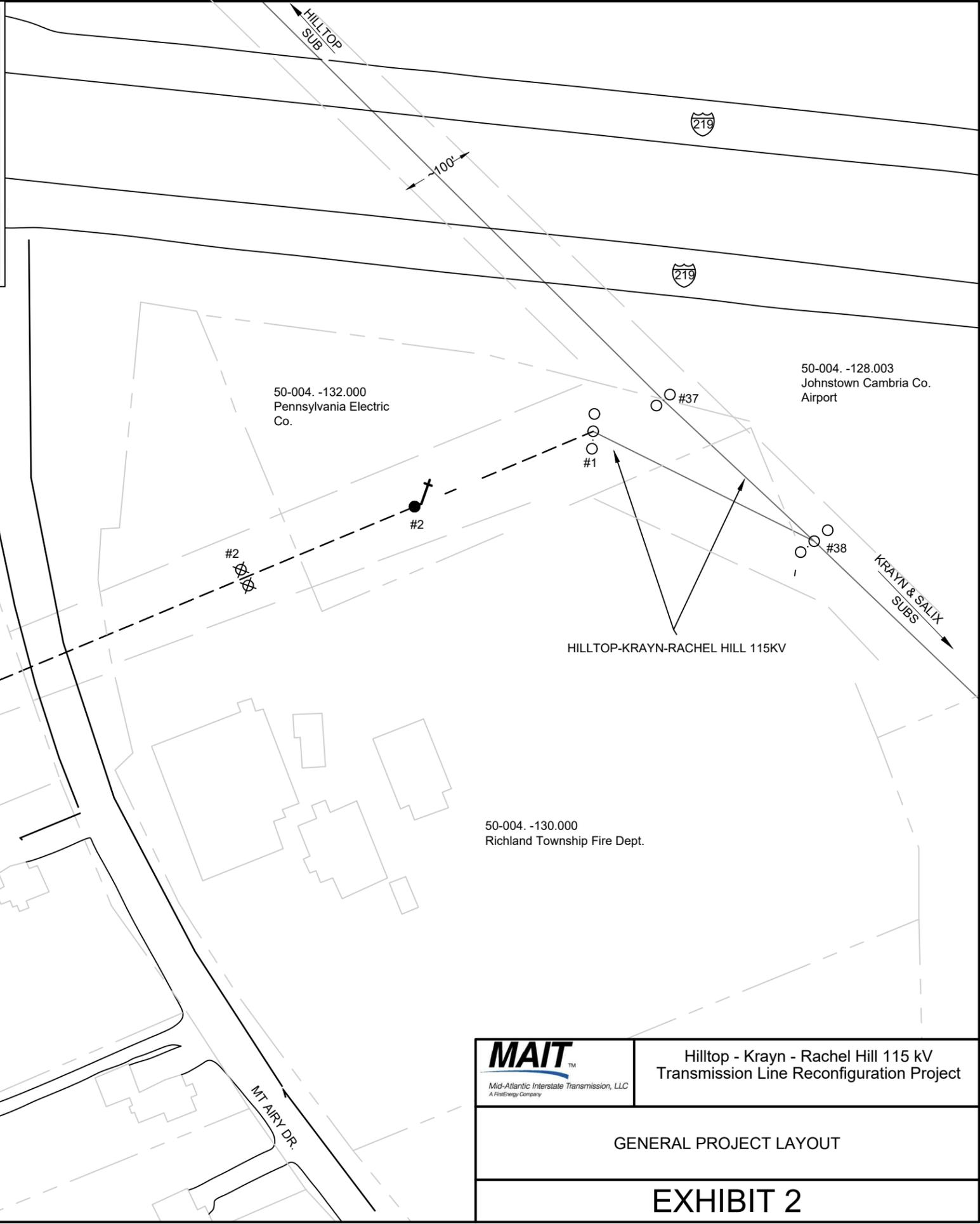
**MAIT**  
 Mid-Atlantic Interstate Transmission, LLC  
 a Redwood Group

Hilltop - Krayn - Rachel Hill 115 kV Transmission Line  
 Reconfiguration Project

# **EXHIBIT 2**

**LEGEND**

	- SWITCH		- PAVED ROADWAY
	- EXISTING STRUCTURE		- PROPERTY LINE
	- PROPOSED STRUCTURE		- EXISTING TRANSMISSION LINE
	- POLE TO BE REMOVED		- EXISTING TRANSMISSION LINE TO BE TRANSFERRED
	- ROW EDGE		



  
 CAMBRIA COUNTY  
 COMMONWEALTH OF PENNSYLVANIA

50-004.-162.000  
Berwind Corp.

50-004.-132.000  
Pennsylvania Electric  
Co.

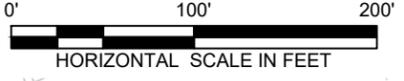
50-004.-128.003  
Johnstown Cambria Co.  
Airport

50-004.-130.000  
Richland Township Fire Dept.

HILLTOP-KRAYN-RACHEL HILL 115KV

MT AIRY DR

HILLTOP-KRAYN-RACHEL HILL 115KV REPLACE LINE SWITCH HILLCLAY JCT 115 EX. 3

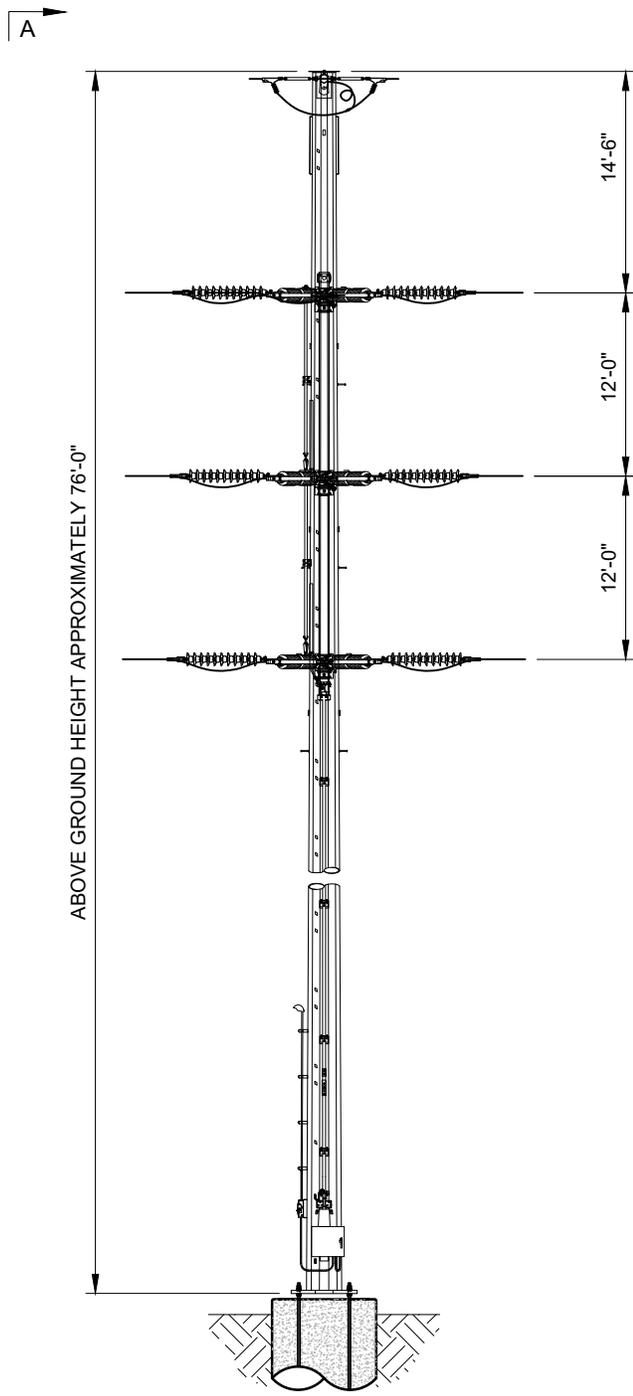


Hilltop - Kraysn - Rachel Hill 115 kV  
Transmission Line Reconfiguration Project

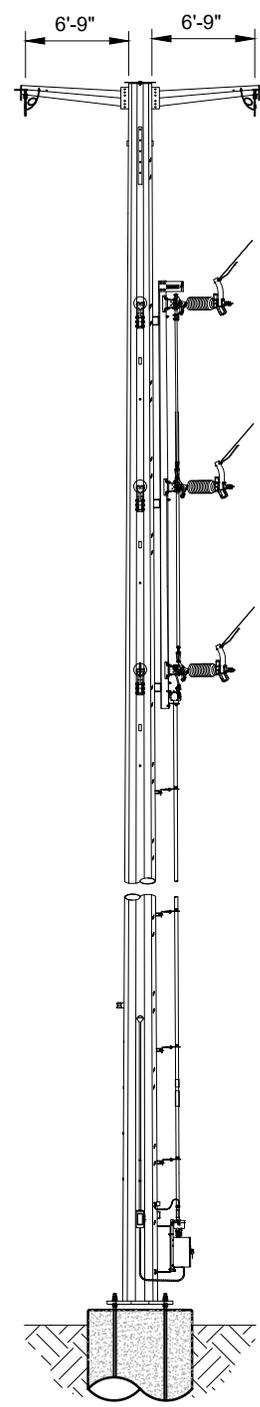
GENERAL PROJECT LAYOUT

**EXHIBIT 2**

# **EXHIBIT 3**



ABOVE GROUND HEIGHT APPROXIMATELY 76'-0"



SECTION A-A

 <p>Mid-Atlantic Interstate Transmission, LLC A FirstEnergy Company</p>	<p>Hilltop - Krayn - Rachel Hill 115 kV Transmission Line Reconfiguration Project</p>
<p>115KV SINGLE CIRCUIT TUBULAR STEEL UNITIZED 2000A SWITCH STRUCTURE WITH WHIP INTERRUPTER VERTICAL SINGLE POLE WITH SHIELD WIRE</p>	
<p><b>EXHIBIT 3</b></p>	

# **EXHIBIT 4**



# **EXHIBIT 5**

**WATERS DELINEATION REPORT**  
**HILLTOP - KRAYN - RACHEL HILL 115 kV TRANSMISSION LINE**  
**STRUCTURES AND ADDITION PROJECT**  
**IN RICHLAND TOWNSHIP**  
**CAMBRIA COUNTY, PENNSYLVANIA**

**Prepared For:**

**MAIT,**  
**A FIRSTENERGY COMPANY**  
**341 WHITE POND DRIVE,**  
**AKRON, OHIO 44320**

**Prepared By:**

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.**  
**700 CHERRINGTON PARKWAY,**  
**MOON TOWNSHIP, PA 15108**

**CEC Project 326-630.0049**

**MARCH 2025**



**Civil & Environmental Consultants, Inc.**

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## FIGURES

Figure 1 Site Location Map

Figure 2 Environmental Data Review Map

Figure 3 Waters Delineation Map

## APPENDICES

Appendix A Soils Information

Appendix B Photographic Summary

Appendix C Wetland Determination Data Sheets

## 1.0 INTRODUCTION

Civil & Environmental Consultants, Inc. (CEC) conducted a waters delineation of the Hilltop-Krayn-Rachel Hill Pole Replacement project located in Cambria County, Pennsylvania (40.3027, -78.8278; Figure 1). The proposed project includes pole replacements in an existing ROW and relocation of an existing switch. This report includes the findings of a desktop data review and field delineation of current site conditions. The purpose was to identify, characterize, and delineate wetlands, streams, and other waters located within the area of interest (AOI). This report presents the methodology and findings.

The U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the United States (WOTUS) under Section 404 of the federal Clean Water Act (CWA), and the placement of structures in or over navigable waters under Sections 9 and 10 of the Rivers and Harbors Act of 1899. Navigable waters are those waters subject to the ebb and flow of the tide shoreward to the mean high water mark and/or are presently used, or have been used in the past, or may be susceptible to use in interstate or foreign commerce, as defined in 33 Code of Federal Regulations (CFR) 329.4. Federally jurisdictional WOTUS are defined in 33 CFR Part 328 as traditional navigable waters, their relatively permanent tributaries, wetlands adjacent with a continuous surface connection to jurisdictional waters, and certain other waterbodies (lakes, ponds, impoundments, and captured streams) if not isolated or otherwise categorically excluded. Wetlands, streams, and other waters that meet the guidelines contained in the Corps Manual, Regional Supplement, and/or exhibit ordinary high water marks (OHWM) might be subject to regulation by USACE as WOTUS as defined by 33 CFR 328.3(a).

This report is intended to document potentially jurisdictional waters using regulatory guidelines. The status and extent of waters is subject to jurisdictional determination by the USACE and state agencies. Under the current federal WOTUS rule, ephemeral streams may not be considered WOTUS since they may not be Relatively Permanent Waterbodies (RPWs). The relatively permanent standard is flowing or standing water year-round or continuously during certain times of year. “Certain times of the year” is intended to include extended periods of standing or continuously flowing water occurring in the same geographic feature year after year, except in

times of drought. RPWs do not include tributaries with flowing or standing water for only a short duration in direct response to precipitation. No minimum flow duration for RPWs has been established because flow duration qualifying as “continuously during certain times of year” varies extensively by regional climate. The flow regimes ascribed to the delineated streams is a preliminary opinion based on channel conditions at the time of the field delineation and may require supplemental data for jurisdictional determination purposes. Similarly, isolated streams or wetlands that lack a continuous surface connection to RPWs may also not qualify as WOTUS, but downstream connectivity of the delineated waters may require further investigation to sufficiently determine jurisdictional status according to the adjacency test.

## **2.0 METHODOLOGY**

### **2.1 ENVIRONMENTAL DATA REVIEW**

Prior to the field delineation, the following data sources were consulted to aid in the identification of potential wetlands, streams, and other waters within the AOI:

- U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle maps;
- U.S. Department of Agriculture, Natural Resource Conservation Service (USDA-NRCS) Soil Survey Geographic (SSURGO) Database;
- Federal Emergency Management Agency (FEMA) flood hazard data;
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI);
- National Hydrography Dataset (NHD);
- Aerial imagery from various sources; and
- Antecedent Precipitation Tool (APT).

These publicly available data sources aided in overall habitat characterizations and facilitated potential water resource identification within the AOI; topographic depressions, mapped hydric soils, mapped NWI and NHD features, and FEMA floodplains have higher potential to contain wetlands, streams, and other surface water features.

### **2.2 FIELD METHODS**

CEC performed a waters delineation to identify and delineate wetlands, streams, and other waters within the AOI. The following sections outline the field methods used to delineate these waters.

#### **2.2.1 Wetland Delineation**

CEC ecologists identified, characterized, and delineated wetlands in accordance with the routine, on-site determination methodology described in the U.S. Army Corps of Engineers' (USACE)

*Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987); referred to hereafter as Corps Manual), supplemented by the following technical guidance documents:

- *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0)* (USACE 2012); (referred to hereafter as Regional Supplement);
- *National Wetland Plant List* (USACE 2022); and
- *Field Indicators of Hydric Soils in the United States Version 8.2* (USDA-NRCS 2018).

CEC ecologists walked the AOI and collected data at representative locations within each plant community cover type and areas with potential water features characteristics (e.g. localized depressions, converging slopes, evident hydrology, etc.). Data collected at each sampling point were recorded on USACE Wetland Determination Data Sheets. The sampling plan was modified as necessary if additional plant community cover types or potential water features characteristics were encountered.

At each sampling point, the following parameters were assessed: vegetation, soils, and hydrology. First, visual estimates of percent absolute cover of plant species were recorded for each of the following strata, when present: tree, sapling/shrub, herb, and woody vine. A determination of whether the plant community was dominated by hydrophytic (wetland) plants was then made using the Rapid Test or Dominance Test indicators. Next, soils were sampled to determine if soils met hydric soil indicators. Lastly, wetland hydrology indicators (e.g., surface water, high water table, saturation, etc.) were recorded, if present.

The sampling point data were used to determine whether that point was located in a wetland or non-wetland (i.e. upland). If a wetland was identified, further sampling was performed to delineate the wetland/non-wetland boundary. Each wetland was also classified according to the NWI classification system developed by the Federal Geographic Data Committee (2013) and Cowardin et al. (1979).

- **Palustrine emergent wetland (PEM):** rooted herbaceous and grass like plants which stand erect above the water or ground surface characterize this wetland class (excluding

mosses or lichens). Vegetation is present for most of the growing season in most years. Emergent wetlands include marshes, meadows, and fens.

- **Palustrine scrub-shrub wetland (PSS):** woody vegetation less than 20 feet tall dominate this wetland class. Plant species include true shrubs, young trees, and trees or shrubs that are small or stunted because of environmental conditions. Scrub-shrub wetlands include shrub swamps and bogs.
- **Palustrine forested wetland (PFO):** woody vegetation 20 feet or taller dominate this wetland class. Forested wetlands generally include an overstory of trees, an understory of young trees and shrubs, and an herbaceous layer.
- **Palustrine unconsolidated bottom (PUB):** nontidal wetland lacking vegetation but is less than 8 hectare (20 acres) in size with a water depth in the deepest part of basin less than 2.5 meters (8.2 feet) at low water. Includes all wetlands and deepwater habitats with at least 25 percent cover of particles smaller than stones (less than 6-7 centimeter), and a vegetative cover less than 30 percent.

If more than one Cowardin classification type was identified within a wetland, the boundary between the types was delineated. Wetland boundaries were recorded using a mapping-grade handheld Global Navigational Satellite System (GNSS) receiver capable of sub-meter accuracy.

Upland habitats were also recorded on USACE Wetland Determination Data Sheets. Upland sampling points were documented adjacent to wetland delineation boundaries, as well as at representative upland habitats throughout the AOI.

### **2.2.2 Stream and Other Waters Delineation**

Concurrent with the wetland delineation, CEC ecologists walked the AOI to identify streams and other waters. These waters were evaluated for the presence of an ordinary high water mark (OHWM) in accordance with USACE Regulatory Guidance Letter (RGL) No. 05-05: Ordinary High Water Mark Identification (USACE 2005), USACE *Interim National Ordinary High Water Mark Field Delineation Manual for Rivers and Streams* (USACE 2022), and definitions under 33 CFR 328. As described in these OHWM guidance materials and 33 CFR 328.3(c)(4), an OHWM is established by a clear, natural line impressed upon the bank, shelving, changes in the character

of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas. Potential jurisdiction limits are delineated using OHWM indicators as weight of evidence including geomorphic (e.g. breaks in slope), transition of vegetation types, changes in sediment type, and other indicators demarcating the regular high flow surface water elevation (e.g. observed flow event, wrack, of leaf litter disturbed or washed away). The uppermost limit of an ephemeral stream was established where the stream loses its defined bed and bank or OHWM.

In addition, all watercourses, which include streams, are defined in Pennsylvania as [“a channel or conveyance of surface water having defined bed and banks” (P.A. Code § 106.1)]. The federal and state guidance were applied to determine the extents of streams.

For streams, physical and biological data were used to infer the stream’s hydrologic flow regime, using a weight-of-evidence approach. CEC used field indicators such as flow, substrate composition, presence of defined bed and bank, origin of hydrologic sources, presence/absence of vegetation within the stream channel, and presence/absence benthic macroinvertebrates, fish, and other aquatic biota to classify onsite stream segments into one of three stream types:

- **Ephemeral:** surface water flows or pools only in direct response to precipitation (e.g., rain or snow fall);
- **Intermittent:** surface water flows continuously during certain times of the year and more than in direct response to precipitation (e.g., seasonally when the groundwater table is elevated or when snowpack melts); and
- **Perennial:** surface water flows continuously year-round during normal rainfall. Ground water provides the primary hydrology.

The uppermost limit of an ephemeral stream was established where the stream loses its defined bed and bank or OHWM. Stream boundaries were located using GNSS receivers capable of sub-meter accuracy. The physical characteristics of the streams and field observations were summarized on field data forms.

## **3.0 RESULTS**

### **3.1 ENVIRONMENTAL DATA REVIEW**

The USGS 7.5-minute topographic quadrangle and NHD stream layer identified no streams within the AOI (Figures 1 and 2). The NWI data also identified no wetlands within the AOI (Figure 2). The SSURGO data identified three soil mapping units within the AOI, none of which were predominantly hydric (Appendix A and Figure 2).

### **3.2 FIELD RESULTS**

CEC staff conducted a field delineation on October 8, 2024, to identify, delineate, and classify wetlands, streams, and other waters within the AOI. The AOI consisted of a grass yard, existing right-of-way, and contains a parking lot. No wetlands or streams were found within the AOI (Figure 3). A photographic summary is included in Appendix B. Wetland Determination Data Sheets are provided in Appendices C, respectively.

#### **3.2.1 Wetland Delineation**

No wetlands were identified within the AOI. Three (3) sampling points were taken to document upland habitats within the AOI.

#### **3.2.2 Stream and Other Waters Delineation**

No streams were identified within the AOI.

## 4.0 CONCLUSIONS

CEC conducted a waters delineation within the AOI on October 8, 2024, and identified no streams or wetlands within the AOI.

## 5.0 REGULATORY CONSIDERATIONS

The USACE has authority to permit the discharge of dredged or fill material into WOTUS under Section 404 of the federal Clean Water Act, and to permit work and the placement of structures in navigable waters under Sections 9 and 10 of the Rivers and Harbors Act of 1899. Wetlands, streams, and other waters that meet the guidelines contained in the Corps Manual, Regional Supplement, and Regulatory Guidance Letter No. 05-05 are subject to regulation by USACE as WOTUS as defined by 33 CFR 328.3(a), and the currently in effect regulatory definition (SCOTUS 2023).

As a result of ongoing litigation with the January 2023 Revised Definition of ‘Waters of the United States’ Rule (2023 WOTUS Rule), federal agencies will implement the 2023 WOTUS Rule, as amended by the conforming rule, in 23 states, the District of Columbia, and the U.S. Territories. In the other 27 states and for certain parties, the agencies are interpreting "WOTUS" consistent with the pre-2015 regulatory regime and the Supreme Court's decision in *Sackett v. Environmental Protection Agency* (May 24, 2023) until further notice.

If CWA Section 404 authorization and/or other federal permits are required for the proposed project, consultation with the USFWS will likely be required pursuant to Section 7 of the Endangered Species Act. Furthermore, consultation with the State Historic Preservation Office may also be required relative to potential effects to resources listed on or eligible for listing on the National Register of Historic Places. The PADEP has coinciding jurisdiction over “waters of the Commonwealth” as established by the Dam Safety and Encroachments Act (P.L. 1375, No. 325) and the Clean Streams Law (P.L. 1987, No. 3941). The PA Code of State Regulations, in Title 25, Chapter 105 Dam Safety and Waterway Management, defines “waters of the Commonwealth” as any watercourse, stream, waterbody, or wetland, including their floodways. Like the USACE, the PADEP generally considers channels to be potentially jurisdictional if they exhibit defined bed and banks, whether natural or artificial, with perennial or intermittent flow. The PADEP regulates encroachments, defined as “any structure or activity which changes, expands or diminishes the course, current or cross section of a watercourse, floodway, or body of water” through the Chapter

105 permit process. The floodway is defined as extending 50 feet from the top of bank of watercourses if not delineated by a Federal Emergency Management Agency (FEMA) study.

In Pennsylvania, the USACE has delegated authority to the PADEP to authorize minor qualifying activities through the state-wide Section 404 permit titled PA State Programmatic General Permit 6 (PASPGP-6), with concurrent review by USACE for certain categories of impacts. A Joint Permit Application to PADEP and USACE is typically required for activities with more significant impacts that exceed the thresholds of PA Chapter 105 General Permits and PASPGP-6. In addition to encroachments, permits for discharges to waters, including from construction stormwater runoff or erosion, may be required by National Pollutant Discharge Elimination System (NPDES) and PA Chapter 102 regulations.

Waters within the AOI were delineated using guidelines set forth by the Pennsylvania DEP and USACE, which have final regulatory authority on the jurisdiction and extents of wetlands, streams, and other waters.

**It is the responsibility of any party that intends to discharge dredge or fill material into WOTUS and/or isolated waters to comply with all applicable regulations.**

## 6.0 LEVEL OF CARE

This waters delineation has been prepared based on the best available information, interpreted in the light of the investigator's training, experience, and professional judgement in conformance with USACE and other applicable agency guidelines, and with the level of care and skill ordinarily exercised by members of the environmental consulting profession practicing contemporaneously under similar conditions in the locality of the site. The waters boundaries described in this report may change subsequent to CEC's delineation based on changes in the regulatory criteria, seasonal variations in hydrology, alterations to drainage patterns, and other human activities and/or land disturbances.

Report Prepared By:



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Sara Keddie

3/7/2025

Assistant Project Manager  
Civil & Environmental Consultants, Inc.

Report Reviewed By:



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Gretchen Addington

3/7/2025

Project Manager  
Civil & Environmental Consultants, Inc.

## 7.0 REFERENCES

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USFWS. National Wetlands Inventory. Available online at:

<https://www.fws.gov/program/national-wetlands-inventory>

USGS. 3D Hydrography Program (3DHP). Available online at:

[https://hydro.nationalmap.gov/arcgis/rest/services/3DHP\\_all/MapServer](https://hydro.nationalmap.gov/arcgis/rest/services/3DHP_all/MapServer)

Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at: <https://websoilsurvey.nrcs.usda.gov/>.

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## **FIGURES**

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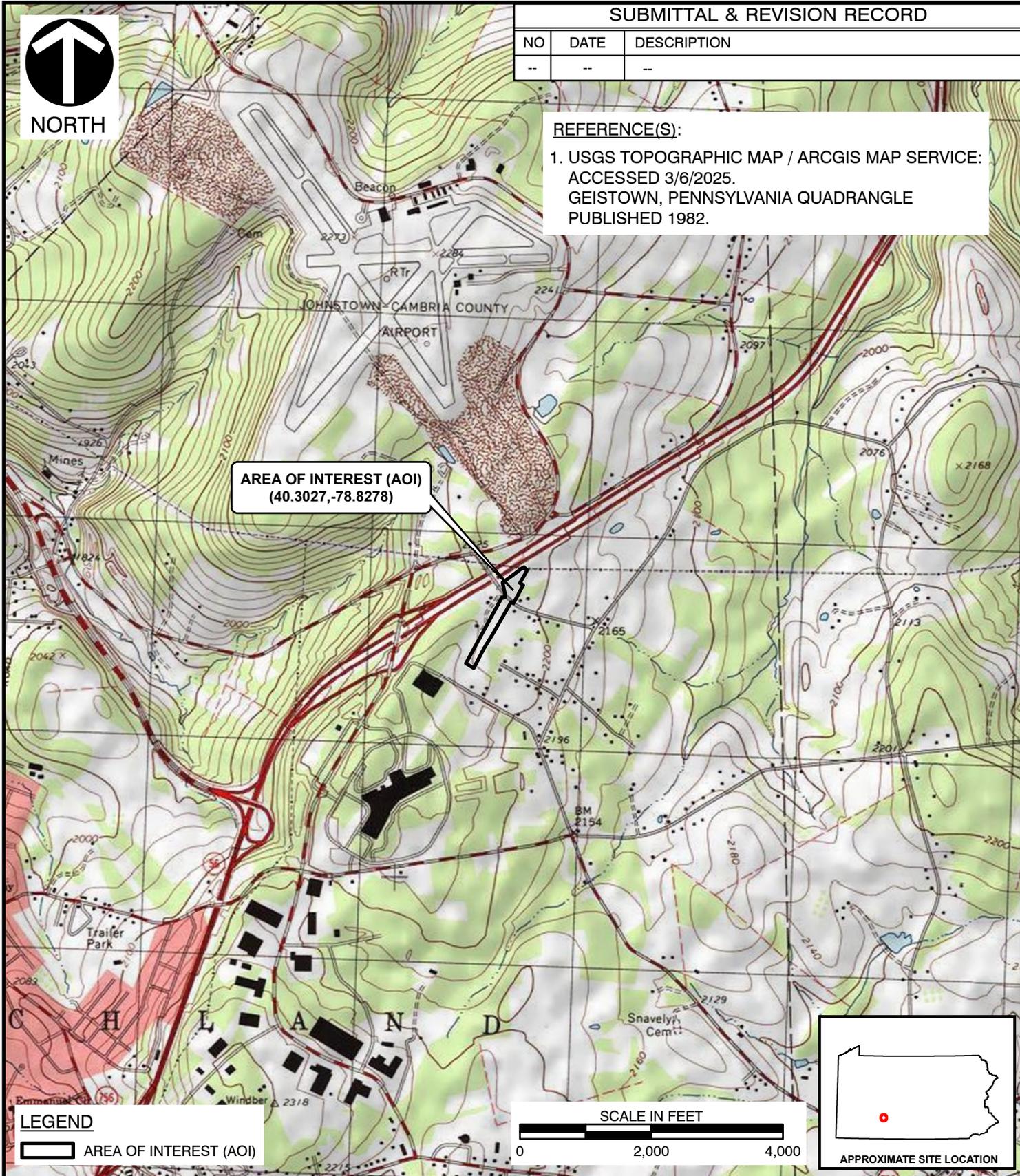
SUBMITTAL & REVISION RECORD

NO	DATE	DESCRIPTION
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REFERENCE(S):

- USGS TOPOGRAPHIC MAP / ARCGIS MAP SERVICE:  
 ACCESSED 3/6/2025.  
 GEISTOWN, PENNSYLVANIA QUADRANGLE  
 PUBLISHED 1982.



AREA OF INTEREST (AOI)  
(40.3027,-78.8278)

LEGEND

AREA OF INTEREST (AOI)

SCALE IN FEET

0 2,000 4,000

APPROXIMATE SITE LOCATION



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700 Cherrington Parkway  
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PEN ELEC, A FIRSTENERGY COMPANY  
HILLTOP-KRAYN-RACHEL HILL POLE REPLACEMENT PROJECT  
CAMBRIA COUNTY, PENNSYLVANIA

SITE LOCATION MAP

DRAWN BY:	CLC	CHECKED BY:	MRM	APPROVED BY:	GAA*	FIGURE NO:	1
DATE:	11/14/2024	SCALE:	1"=2,000'	PROJECT NO:	326-630		

\*Hand Signature on file



**SUBMITTAL & REVISION RECORD**

NO	DATE	DESCRIPTION
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- REFERENCES**
1. ESRI WORLD IMAGERY / ARCGIS MAP SERVICE:  
[HTTP://GOTO.ARCGISONLINE.COM/MAPS/WORLD\\_IMAGERY](http://GOTO.ARCGISONLINE.COM/MAPS/WORLD_IMAGERY),  
ACCESSED 3/6/2025.
  2. USFWS NATIONAL WETLANDS INVENTORY (NWI)  
DATA BY STATE, ACCESSED 3/6/2025.
  3. USGS NATIONAL HYDROGRAPHY DATASET (NHD)  
FRAMEWORK WEB SERVICE:  
[HTTP://FRAMEWORKWFS.USGS.GOV/FRAMEWORK/WMS/WMS.CGI](http://FRAMEWORKWFS.USGS.GOV/FRAMEWORK/WMS/WMS.CGI),  
ACCESSED 3/6/2025.
  4. FEMA D-FIRM NATIONAL FLOOD HAZARD LAYER  
ACCESSED 3/6/2025.
  5. USDA, NRCS SOIL SURVEY GEOGRAPHIC (SSURGO)  
DATABASE, ACCESSED 3/6/2025.

**LEGEND**

	AREA OF INTEREST (AOI)
	RIVER
	LAKE
	FRESHWATER POND
	RIVERINE
	1% ANNUAL CHANCE FLOOD HAZARD
	MAPPED NON-HYDRIC SOIL
	MAPPED HYDRIC SOIL



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HILLTOP-KRAYN-RACHEL HILL POLE REPLACEMENT PROJECT  
CAMBRIA COUNTY, PENNSYLVANIA

**ENVIRONMENTAL DATA REVIEW MAP**

DRAWN BY:	CLC	CHECKED BY:	MRM	APPROVED BY:	GAA*	FIGURE NO:	<b>2</b>
DATE:	3/6/2025	SCALE:	1"=200'	PROJECT NO:	326-630		

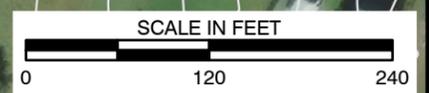
\*Hand signature on file

**SUBMITTAL & REVISION RECORD**

NO	DATE	DESCRIPTION
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REFERENCES  
 1. ESRI WORLD IMAGERY / ARCGIS MAP SERVICE:  
[HTTP://GOTO.ARCGISONLINE.COM/MAPS/WORLD\\_IMAGERY](http://GOTO.ARCGISONLINE.COM/MAPS/WORLD_IMAGERY),  
 ACCESSED 3/6/2025.  
 2. PAMAP PROGRAM LIDAR DATA, 2' INTERVAL, 2006.



**LEGEND**

- AREA OF INTEREST (AOI)
- SAMPLING POINT
- CONTOUR (2FT. INTERVAL)

700 Cherrington Parkway  
 Moon Township, PA 15108  
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DRAWN BY:	CLC	CHECKED BY:	MRM
DATE:	3/6/2025	SCALE:	1" = 120'

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 HILLTOP-KRAYN-RACHEL HILL POLE REPLACEMENT PROJECT  
 CAMBRIA COUNTY, PENNSYLVANIA

WATERS DELINEATION MAP

APPROVED BY:	GAA*	FIGURE NO:	<b>3</b>
PROJECT NO:	326-630		

\*Hand signature on file

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**APPENDIX A**

**SOIL INFORMATION**

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**Table 1. SSURGO Soil Mapping Units within the Study Area<sup>(1)</sup>**

Soil Map Unit Symbol	Soil Map Unit Name	Drainage Class	Hydric Rating
CeB	Cookport and Ernest soils, 3 to 8 percent slopes	Moderately well drained	Predominantly non-hydric
LaB	Laidig loam, 3 to 8 percent slopes	Well drained	Non-hydric
HaB	Hazleton channery loam, 3 to 8 percent slopes	Well drained	Non-hydric

<sup>(1)</sup>Web Soil Survey (<http://websoilsurvey.nrcs.usda.gov>), accessed 11/18/2024.

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**APPENDIX B**

**PHOTOGRAPHIC SUMMARY**

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**1. Upland Sample Point SP-01  
Facing Northeast**



**2. Upland Sample Point SP-02  
Facing South**



**3. Upland Sample Point SP-03  
Facing West**



**4. Site Overview  
Facing Northeast**



**5. Site Overview  
Facing Southwest**



**6. Site Overview  
Facing Northeast**



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**PENELEC, A FirstEnergy Company  
Hilltop-Krayn-Rachel Hill Switch Project  
326-630.0049**

**Photographs Taken: October 8, 2024**

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**APPENDIX C**

**WETLAND DETERMINATION DATA SHEETS**

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## WETLAND DETERMINATION DATA FORM - Eastern Mountains and Piedmont

Project/Site: 326-630.0049 Hilltop City/County: Cambria County Sampling Date: October 8, 2024  
 Applicant/Owner: FirstEnergy State: PA Sampling Point: SP-01  
 Investigator(s): MRM Section, Township, Range: NA  
 Landform (hillslope, terrace, etc.): Flat Local Relief (concave, convex, none): None Slope (%): 0-2  
 Subregion (LRR or MLRA): LRR N Lat: 40.30066232 Long: -78.82920221 Datum: NAD83  
 Soil Map Unit Name: Cookport and Ernest soils, 3 to 8 percent slopes NWI classification: None  
 Are climatic/hydrologic conditions on the site typical for this time of year? Yes X No      (If no, explain in Remarks.)  
 Are Vegetation No, Soil No, or Hydrology No significantly disturbed? Are "Normal Circumstances" present?  
 Yes X No       
 Are Vegetation No, Soil No, or Hydrology No naturally problematic? (If needed, explain any answers in Remarks.)

**SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.**

Hydrophytic Vegetation Present?	Yes <u>    </u> No <u>X</u>	Is the Sampled Area within a Wetland?	Yes <u>    </u> No <u>X</u>
Hydric Soil Present?	Yes <u>    </u> No <u>X</u>	UPL	
Wetland Hydrology Present?	Yes <u>    </u> No <u>X</u>		
Remarks:  Upland sample point located in a mowed, maintained field in an existing ROW adjacent to a baseball field and paved parking lot.			

**HYDROLOGY**

Wetland Hydrology Indicators:	Secondary Indicators (minimum of two required)
Primary Indicators (minimum of one is required; check all that apply)	
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Surface Soil Cracks (B6)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Moss Trim Lines (B16)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Stunted or Stressed Plants (D1)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Aquatic Fauna (B13)	<input type="checkbox"/> Microtopographic Relief (D4)
	<input type="checkbox"/> FAC-Neutral Test (D5)
<b>Field Observations:</b>	
Surface Water Present? Yes <u>    </u> No <u>X</u> Depth (inches): <u>    </u>	<b>Wetland Hydrology Present?</b> Yes <u>    </u> No <u>X</u>
Water Table Present? Yes <u>    </u> No <u>X</u> Depth (inches): <u>    </u>	
Saturation Present? Yes <u>    </u> No <u>X</u> Depth (inches): <u>    </u> (includes capillary fringe)	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:	
Remarks:	

**VEGETATION (Four Strata) - Use scientific names of plants.**

Sampling Point: SP-01

Tree Stratum (Plot size: <u>30</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
	<u>0</u>	= Total Cover	

Sapling/Shrub Stratum (Plot Size: <u>15</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
	<u>0</u>	= Total Cover	

Herb Stratum (Plot size: <u>5</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Festuca rubra</i>	15	Y	FACU
2. <i>Poa pratensis</i>	20	Y	FACU
3. <i>Trifolium repens</i>	15	Y	FACU
4. <i>Achillia millefolium</i>	10	N	FACU
5. <i>Taraxacum officinale</i>	10	N	FACU
6. <i>Dactylis glomerata</i>	20	Y	FACU
7. <i>Potentilla simplex</i>	5	N	FACU
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
12. _____	_____	_____	_____
	<u>95</u>	= Total Cover	

Woody Vine Stratum (Plot size: <u>15</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
	<u>0</u>	= Total Cover	

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 4 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0% (A/B)

**Prevalence Index worksheet:**

Total % Cover of: \_\_\_\_\_ Multiply by: \_\_\_\_\_

OBL species \_\_\_\_\_ x 1 = \_\_\_\_\_

FACW species \_\_\_\_\_ x 2 = \_\_\_\_\_

FAC species \_\_\_\_\_ x 3 = \_\_\_\_\_

FACU species \_\_\_\_\_ x 4 = \_\_\_\_\_

UPL species \_\_\_\_\_ x 5 = \_\_\_\_\_

Column Totals: \_\_\_\_\_ (A) \_\_\_\_\_ (B)

Prevalence Index = B/A = \_\_\_\_\_

- Hydrophytic Vegetation Indicators:**
- \_\_\_\_\_ 1 - Rapid Test for Hydrophytic Vegetation
  - \_\_\_\_\_ 2 - Dominance Test is >50%
  - \_\_\_\_\_ 3 - Prevalence Index is ≤3.0<sup>1</sup>
  - \_\_\_\_\_ 4 - Morphological Adaptations<sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
- \_\_\_\_\_ Problematic Hydrophytic Vegetation<sup>1</sup> (Explain)
- <sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Four Vegetation Strata:**

**Tree** - Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

**Sapling** - Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.

**Shrub** - Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.

**Herb** - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

**Woody Vines** - All woody vines greater than 3.28 ft in height.

**Hydrophytic Vegetation Present?** Yes \_\_\_\_\_ No X

Remarks: (Include photo numbers here or on a separate sheet.)



**WETLAND DETERMINATION DATA FORM - Eastern Mountains and Piedmont**

Project/Site: 326-630.0049 Hilltop City/County: Cambria County Sampling Date: October 8, 2024  
 Applicant/Owner: FirstEnergy State: PA Sampling Point: SP-02  
 Investigator(s): MRM Section, Township, Range: NA  
 Landform (hillslope, terrace, etc.): Flat Local Relief (concave, convex, none): None Slope (%): 0-2  
 Subregion (LRR or MLRA): LRR N Lat: 40.30274481 Long: -78.82773584 Datum: NAD83  
 Soil Map Unit Name: Hazleton channery loam, 3 to 8 percent slopes NWI classification: None  
 Are climatic/hydrologic conditions on the site typical for this time of year? Yes X No      (If no, explain in Remarks.)  
 Are Vegetation No, Soil No, or Hydrology No significantly disturbed? Are "Normal Circumstances" present?  
 Yes X No       
 Are Vegetation No, Soil No, or Hydrology No naturally problematic? (If needed, explain any answers in Remarks.)

**SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.**

Hydrophytic Vegetation Present? Yes <u>    </u> No <u>X</u> Hydric Soil Present? Yes <u>    </u> No <u>X</u> Wetland Hydrology Present? Yes <u>    </u> No <u>X</u>	Is the Sampled Area within a Wetland? Yes <u>    </u> No <u>X</u> UPL
Remarks:  Upland sample point located in an overgrown ROW in between residential yards.	

**HYDROLOGY**

<b>Wetland Hydrology Indicators:</b> Primary Indicators (minimum of one is required; check all that apply)	<b>Secondary Indicators (minimum of two required)</b>
<input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> True Aquatic Plants (B14) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> Aquatic Fauna (B13)	<input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)
<b>Field Observations:</b> Surface Water Present? Yes <u>    </u> No <u>X</u> Depth (inches): <u>    </u> Water Table Present? Yes <u>    </u> No <u>X</u> Depth (inches): <u>    </u> Saturation Present? Yes <u>    </u> No <u>X</u> Depth (inches): <u>    </u> (includes capillary fringe)	<b>Wetland Hydrology Present?</b> Yes <u>    </u> No <u>X</u>
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:  Remarks:	

**VEGETATION (Four Strata) - Use scientific names of plants.**

Sampling Point: SP-02

Tree Stratum (Plot size: <u>30</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			
8. _____			
9. _____			
10. _____			
	<u>0</u>	= Total Cover	

Sapling/Shrub Stratum: (Plot Size: <u>15</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Rubus allegheniensis</u>	10	Y	FACU
2. <u>Elaeagnus umbellata</u>	5	Y	UPL
3. _____			
4. _____			
5. _____			
6. _____			
7. _____			
8. _____			
9. _____			
10. _____			
	<u>15</u>	= Total Cover	

Herb Stratum: (Plot size: <u>5</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Solidago altissima</u>	25	Y	FACU
2. <u>Solidago rugosa</u>	5	N	FAC
3. <u>Achillea millefolium</u>	5	N	FACU
4. <u>Festuca rubra</u>	20	Y	FACU
5. <u>Potentilla simplex</u>	10	N	FACU
6. <u>Dactylis glomerata</u>	20	Y	FACU
7. _____			
8. _____			
9. _____			
10. _____			
11. _____			
12. _____			
	<u>85</u>	= Total Cover	

Woody Vine Stratum: (Plot size: <u>15</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____			
2. _____			
3. _____			
4. _____			
5. _____			
	<u>0</u>	= Total Cover	

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 5 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0% (A/B)

**Prevalence Index worksheet:**

Total % Cover of:		Multiply by:	
OBL species	<u>0</u> x 1 =		<u>0</u>
FACW species	<u>5</u> x 2 =		<u>10</u>
FAC species	<u>0</u> x 3 =		<u>0</u>
FACU species	<u>5</u> x 4 =		<u>20</u>
UPL species	<u>0</u> x 5 =		<u>0</u>
Column Totals:	<u>10</u> (A)		<u>30</u> (B)

Prevalence Index = B/A = 3.0

- Hydrophytic Vegetation Indicators:**
- 1 - Rapid Test for Hydrophytic Vegetation
  - 2 - Dominance Test is >50%
  - 3 - Prevalence Index is ≤3.0<sup>1</sup>
  - 4 - Morphological Adaptations<sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
- Problematic Hydrophytic Vegetation<sup>1</sup> (Explain)
- <sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Four Vegetation Strata:**

**Tree** - Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

**Sapling** - Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.

**Shrub** - Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.

**Herb** - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

**Woody Vines** - All woody vines greater than 3.28 ft in height.

**Hydrophytic Vegetation Present?**      Yes         No   X  

Remarks: (Include photo numbers here or on a separate sheet.)





**VEGETATION (Four Strata) - Use scientific names of plants.**

Sampling Point: SP-03

Tree Stratum (Plot size: <u>30</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
	<u>0</u>	= Total Cover	

Sapling/Shrub Stratum: (Plot Size: <u>15</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Rubus allegheniensis</u>	20	Y	FACU
2. <u>Acer rubra</u>	5	Y	FAC
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
	<u>25</u>	= Total Cover	

Herb Stratum: (Plot size: <u>5</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Solidago altissima</u>	15	Y	FACU
2. <u>Solidago rugosa</u>	15	Y	FAC
3. <u>Euthamia graminifolia</u>	5	N	FAC
4. <u>Phleum pratense</u>	15	Y	FACU
5. <u>Dactylis glomerata</u>	15	Y	FACU
6. <u>Schizachyrium scoparium</u>	5	N	FACU
7. <u>Dennstaedtia punctilobula</u>	5	N	FACU
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
12. _____	_____	_____	_____
	<u>75</u>	= Total Cover	

Woody Vine Stratum: (Plot size: <u>15</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
	<u>0</u>	= Total Cover	

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 2 (A)

Total Number of Dominant Species Across All Strata: 6 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 33% (A/B)

**Prevalence Index worksheet:**

Total % Cover of:		Multiply by:	
OBL species	_____ x 1 =		_____
FACW species	_____ x 2 =		_____
FAC species	_____ x 3 =		_____
FACU species	_____ x 4 =		_____
UPL species	_____ x 5 =		_____
Column Totals:	_____ (A)		_____ (B)

Prevalence Index = B/A = \_\_\_\_\_

- Hydrophytic Vegetation Indicators:**
- \_\_\_\_\_ 1 - Rapid Test for Hydrophytic Vegetation
  - \_\_\_\_\_ 2 - Dominance Test is >50%
  - \_\_\_\_\_ 3 - Prevalence Index is ≤3.0<sup>1</sup>
  - \_\_\_\_\_ 4 - Morphological Adaptations<sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
- \_\_\_\_\_ Problematic Hydrophytic Vegetation<sup>1</sup> (Explain)
- <sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Four Vegetation Strata:**

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**Shrub** - Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.

**Herb** - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

**Woody Vines** - All woody vines greater than 3.28 ft in height.

**Hydrophytic Vegetation Present?** Yes \_\_\_\_\_ No X

Remarks: (Include photo numbers here or on a separate sheet.)



# **EXHIBIT 6**

## 1. PROJECT INFORMATION

Project Name: **Hilltop-Krayn-Rachel Hill Switch Replacement Project**

Date of Review: **12/31/2024 01:36:16 PM**

Project Category: **Energy Storage, Production, and Transfer, Energy Transfer, Power/electric line - service, replace existing above/under-ground line**

Project Area: **3.59 acres**

County(s): **Cambria**

Township/Municipality(s): **Richland Township**

ZIP Code:

Quadrangle Name(s): **GEISTOWN**

Watersheds HUC 8: **Conemaugh**

Watersheds HUC 12: **South Fork Little Conemaugh-Little Conemaugh River**

Decimal Degrees: **40.302575, -78.827992**

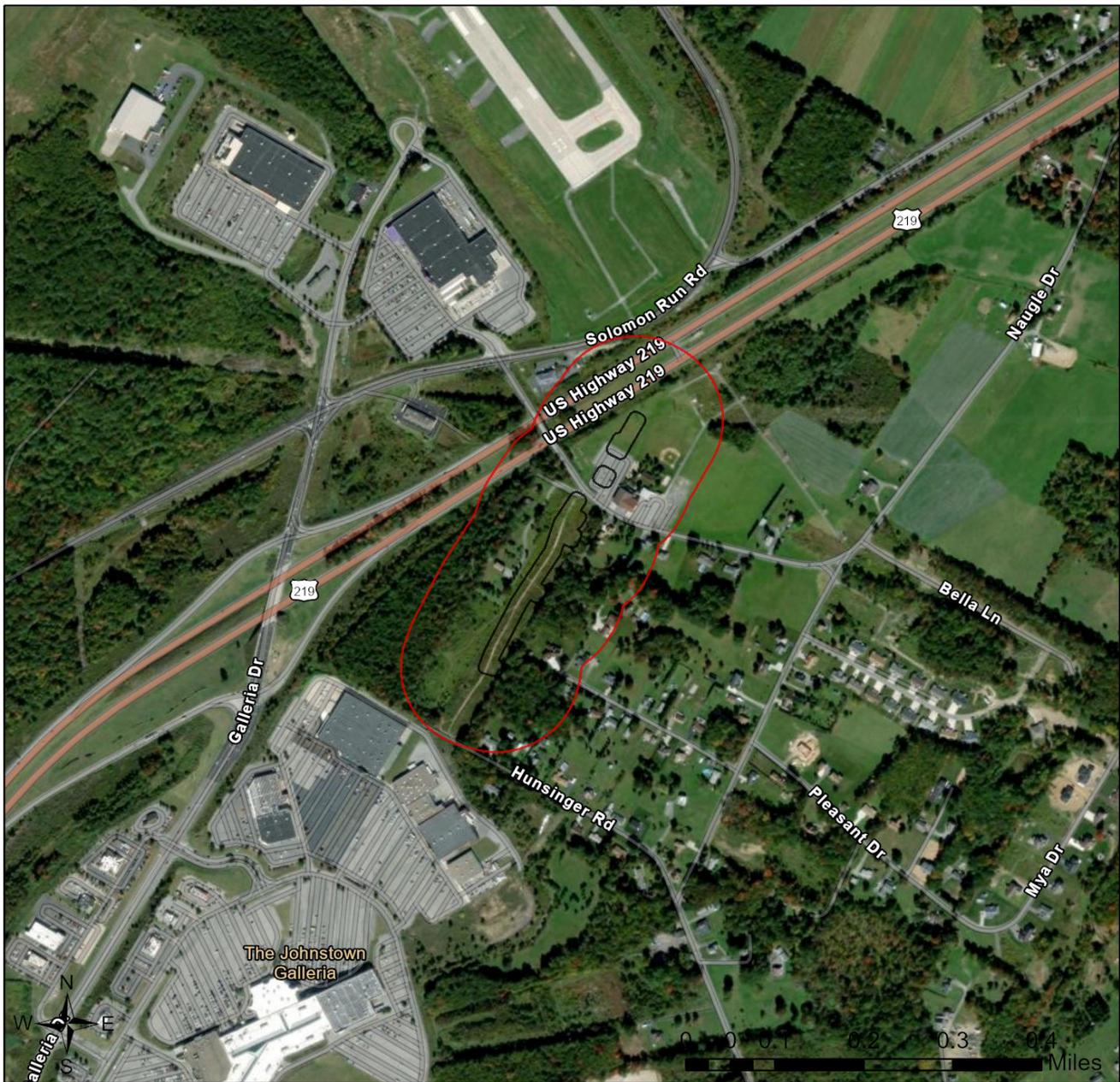
Degrees Minutes Seconds: **40° 18' 9.2706" N, 78° 49' 40.7718" W**

## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

## Hilltop-Krayn-Rachel Hill Switch Replacement Project

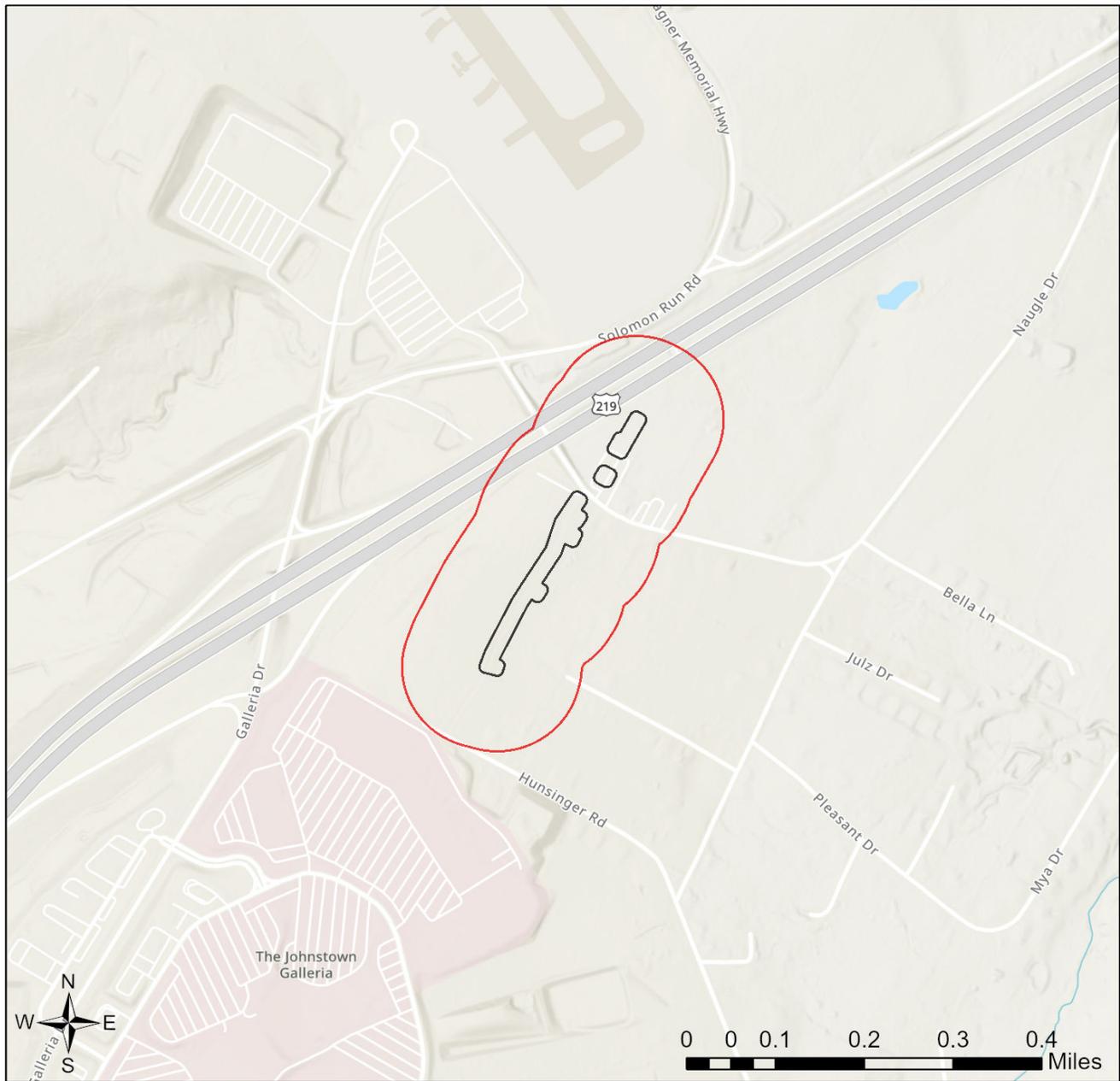


-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

## Hilltop-Krayn-Rachel Hill Switch Replacement Project



-  Buffered Project Boundary
-  Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

## RESPONSE TO QUESTION(S) ASKED

**Q1:** Is tree removal, tree cutting or forest clearing necessary to implement all aspects of this project?

**Your answer is:** No

**Q2:** How many acres of woodland, forest, forested fencerows and trees will be cut, cleared, removed, disturbed or flooded (inundated) as a result of carrying out all aspects or phases of this project? [Round acreages UP to the nearest acre (e.g., 0.2 acres = 1 acre).]

**Your answer is:** zero acres

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

##### RESPONSE:

No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

##### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

## 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.



## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Management  
Division of Environmental Review  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: McKenzie McKeon  
Company/Business Name: Civil & Environmental Consultants, Inc.  
Address: 700 Cherrington Parkway  
City, State, Zip: Moon Township, PA 15108  
Phone: (412 ) 429-2324 Fax: ( )  
Email: mmckeon@cecinc.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

  
applicant/project proponent signature

12/31/2024  
date

# **EXHIBIT 7**



Pennsylvania State Historic Preservation Office  
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

January 21, 2025

*Sent Via PA-SHARE*

RE: ER Project # 2025PR00305.001, Hilltop-Krayan- Rachel Hill Pole Replacement ,  
Department of Environmental Protection, Richland Township, Cambria County

Dear Submitter,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

**Above Ground Resources**

*No Above Ground Concerns - Environmental Review - No Effect - Above Ground*

Based on the information received and available within our files, it is our opinion that the proposed project will have No Effect on above ground historic properties, including historic buildings, districts, structures, and/or objects, should they exist. Should the scope of the project change and/or should you be made aware of historic property concerns, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning above ground resources, please contact Sara-Ladd Manley at [samanley@pa.gov](mailto:samanley@pa.gov).

**Archaeological Resources**

*No Archaeological Concerns - Environmental Review - No Effect - Archaeological*

Based on the information received and available in our files, in our opinion, the proposed project should have No Effect on archaeological resources. Should the scope of the project be amended to include additional ground-disturbing activity and/or should you be made aware of historic property concerns regarding archaeological resources, you will need to reinitiate consultation with our office using PA-SHARE.

For questions concerning archaeological resources, please contact Sara-Ladd Manley at [samanley@pa.gov](mailto:samanley@pa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "B. Frederick". The signature is written in a cursive style with a large initial "B" and a distinct "F".

Barbara Frederick

Environmental Review Division Manager

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LETTER OF NOTIFICATION OF** :  
**MID-ATLANTIC INTERSTATE** :  
**TRANSMISSION, LLC FOR** :  
**APPROVAL OF THE HILLTOP-** :  
**KRAYN-RACHEL HILL 115** : **Docket No. \_\_\_\_\_**  
**KILOVOLT TRANSMISSION LINE** :  
**RECONFIGURATION PROJECT IN** :  
**RICHLAND TOWNSHIP, CAMBRIA** :  
**COUNTY, PENNSYLVANIA** :

**VERIFICATION**

I, Michael DeSarro, state that I am a Transmission Specialist for FirstEnergy Service Company; that I am authorized to make this Verification on behalf of Mid-Atlantic Interstate Transmission, LLC; and that the facts set forth in the Letter of Notification are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Date: November 14, 2025

\_\_\_\_\_  
Michael DeSarro