

## Introduction

FirstEnergy is a forward-thinking electric utility powered by a diverse team of employees committed to making customers' lives brighter, the environment better and our communities stronger. Preserving and protecting the environment is a key part of our mission and business strategy. We conduct sustainable operations that comply with all applicable federal, state and local laws, and we continually work to reduce our impact on the environment.

As a premier electric utility, our priority is to deliver safe and reliable electric service to our customers. Our electric transmission service spans 24,500 miles of lines connecting the Midwest and Mid-Atlantic regions and includes more than 13,000 miles of rights-of-way corridors. As part of our commitment to environmental stewardship, our Vegetation Management group employs an [Integrated Vegetation Management](#) (IVM) program across the rights-of-way that we manage. IVM enables managers to selectively remove incompatible vegetation that would threaten the integrity of our electric service, while cultivating compatible, low-growing, biodiverse vegetation that provides food and cover for insects, pollinators and wildlife. By managing both incompatible and compatible plant communities, we achieve our primary goal of delivering safe and reliable electricity to our customers while conserving and enhancing wildlife habitat.

## Biologically Important Areas

Part of our commitment to biodiversity involves coordinating vegetation management within protected areas and biologically important areas that fall outside of protected areas. To understand the extent and locations of biologically important areas, we conducted a biodiversity exposure assessment of our fee-owned lands and rights-of-way. FirstEnergy does not operate within [World Heritage](#) sites.<sup>1</sup> We do, however, maintain limited critical infrastructure within classified protected areas designated by the [International Union for the Conservation of Nature \(IUCN\)](#) and [Key Biodiversity Areas](#).

## Mitigation Hierarchy

When operating within biologically important areas, we employ a mitigation hierarchy to avoid, minimize, restore and offset any unavoidable disturbance due to construction and maintenance operations. Our mitigation hierarchy seeks to avoid operating in areas of global and national biodiversity, to minimize potential adverse impacts and restore ecological function, and to offset any remaining loss to biodiversity. While we employ a mitigation hierarchy in areas of high biodiversity, our commitment to biodiversity does not end there.

## Targeted Biodiversity Management

Our electric transmission rights-of-way provide abundant opportunities to manage plant communities sustainably through our integrated approach. Our landscape is diverse, spanning from the south-central Great Lakes in northwestern Ohio to the upper Atlantic coastal plains of New Jersey. Diverse topography and vegetation compositions require that our team consider safety, economic and environmental limitations when implementing IVM. Where feasible on the landscape, our skilled employees and contractors prescribe increasingly selective IVM best-management practices to establish and maintain a mosaic of compatible, early successional grass and shrubland habitats.

<sup>1</sup>FirstEnergy's most recent Biodiversity Evaluation was conducted in 2020.

Conservation targets for No Net Loss or Net Improvement are developed in coordination with national, state and municipal agencies, as well as private organizations and landowners. These typically include transitioning incompatible plant communities to a biodiverse mixture of grasses, low-growing shrubs and other compatible vegetation that provides a thriving wildlife habitat and increasingly high conservation value.

## Empowering Partnerships

Natural resource conservation extends well beyond regulatory compliance and even beyond the lands that we manage directly. Caring for the lands under our responsibility means working collaboratively with our stakeholders. We partner with collaborative industry groups and research institutes to improve utility and vegetation management best practices. For example, together with Penn State University, FirstEnergy maintains the electric utility industry's longest running IVM research location at [State Game Lands 33](#) in Pennsylvania.

FirstEnergy is also proud to be one of 30 initial organizations participating in the Monarch Butterfly Candidate Conservation Agreement with Assurances (CCAA). The CCAA is a voluntary collaborative conservation agreement between energy and transportation entities and the U.S. Fish and Wildlife Service (USFWS) that commits resources toward butterfly-friendly management practices on utility and transportation lands. Collectively, the participating organizations manage over 2.5 million acres of rights-of-way and other associated lands across the lower 48 states and are implementing conservation efforts to reduce the rapid decline in monarch butterfly populations.

Additionally, FirstEnergy is actively engaged with the Electric Power Research Institute (EPRI). This includes participating in programs like EPRI's Power and Pollinators Initiative, where we work with 20 other electric companies to implement innovative conservation efforts that attract pollinators to our rights-of-way. We also conducted a five-year study with EPRI and the Cuyahoga Valley National Park to better understand invasive exotic plant ecology and how different vegetation management approaches affect plant community composition and structure.

Our commitment to making our communities stronger is demonstrated by our efforts to reach out to communities directly through information booths and educational literature presented at environmental events. We retain extensive environmental information at our numerous office locations throughout our service area that we gladly offer to any member of the public upon request. We administer a Tree-Based Energy Conservation Program, coordinate tree planting volunteers during Arbor Day and Earth Day activities, and have even created pollinator gardens at several company facilities and provided wildflower seeds directly to our employees.

## Working Towards a Brighter Future

As a premier, customer-focused electric utility, FirstEnergy is actively minimizing the environmental impact of our operations as we continue to build, strengthen and modernize our vast transmission and distribution system. We believe that our transmission rights-of-way provide a unique opportunity to promote diverse plant communities and pollinator-friendly habitats that sustain a healthy environment that benefits wildlife and our communities. Through our commitment to preserving and protecting the natural environment—air, water, land and other natural resources—we can continue to provide safe and reliable electric service while fostering a sustainable environment for future generations.