



Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
Office: 614.227.2300
Fax: 614.227.2390

Dylan F. Borchers
Direct Dial: 614.227.4914
dborchers@bricker.com
www.bricker.com
info@bricker.com

October 2, 2020

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793

**Re: Guernsey Power Station, LLC,
OPSB Case No. 17-1828-EL-BLN**

Dear Ms. Troupe:

On December 1, 2017, the Ohio Power Siting Board ("Board") Staff issued a Report of Investigation approving the Letter of Notification subject to a number of conditions. Within this set of conditions, Condition No. 7 requires that:

Prior to construction, the Applicant shall submit to Staff a streamside vegetation restoration plan, which incorporates the planting of native low-growing shrubs, as mitigation for the clearing of any riparian vegetation adjacent to Wills Creek.

On August 9, 2019 Guernsey Power Station LLC ("GPS") filed a streamside vegetation restoration plan in compliance with Staff Report Condition No. 7. Attached is a copy of GPS's updated streamside vegetation restoration plan, which replaces the plan filed on August 9, 2019.

If you have any questions please call at the number listed above.

Sincerely,

Dylan F. Borchers

Attachment

Cc: Robert Holderbaum (w/Attachment)

Guernsey Power Station Switchyard and Tie-Lines Updated Streamside Vegetation Restoration Plan

The following requirement is incorporated as a condition of the Ohio Power Siting Board (OPSB) Staff Report of Investigation, which forms the basis of OPSB approval of the Guernsey Power Station Electrical Interconnection Project (the Project).

(7) Prior to construction, the Applicant shall submit to Staff a streamside vegetation restoration plan, which incorporates the planting of native low-growing shrubs, as mitigation for the clearing of any riparian vegetation adjacent to Wills Creek.

Work within and near wetlands and the riparian areas adjacent to Wills Creek will be conducted using Best Management Practices (BMPs) as outlined in the Project's Stormwater Pollution Prevention Plan (SWPPP) and in accordance with the individual wetland permit issued by the U.S. Army Corps of Engineers (USACE) on February 21, 2018, and the water quality certification issued by the Ohio Environmental Protection Agency (Ohio EPA) on February 20, 2018. Clearing of existing vegetation along Wills Creek will be limited to the greatest extent possible.

Mechanized clearing is not permitted within 25-feet of the top of the streambanks; therefore, the stumps of the trees that are cut will remain in-situ. As such, the proposed low-growing shrub species will be planted as applicable within the affected areas as to not interfere with the root system of the remaining stumps. Currently, the streambanks within the vegetation clearing zones are nearly vertical so the remaining tree roots will continue to provide streambank stabilization. Revegetation from the growth of leftover root balls will occur over a long period of time.

The attached figure illustrates the six limited areas within the Project work area (totaling approximately 0.96 acre) where it is anticipated that existing vegetation along Wills Creek will be altered due to temporary construction activities and will be maintained as low-growth foliage to keep vegetation away from the overhead power lines. Existing trees in this area will be cut down and the stumps and root system will remain in place to provide streamside soil stabilization while natural undergrowth vegetation continues to grow. Potential restoration activities will be evaluated once the trees have been removed from the area during a season that is conducive to successful plant growth.

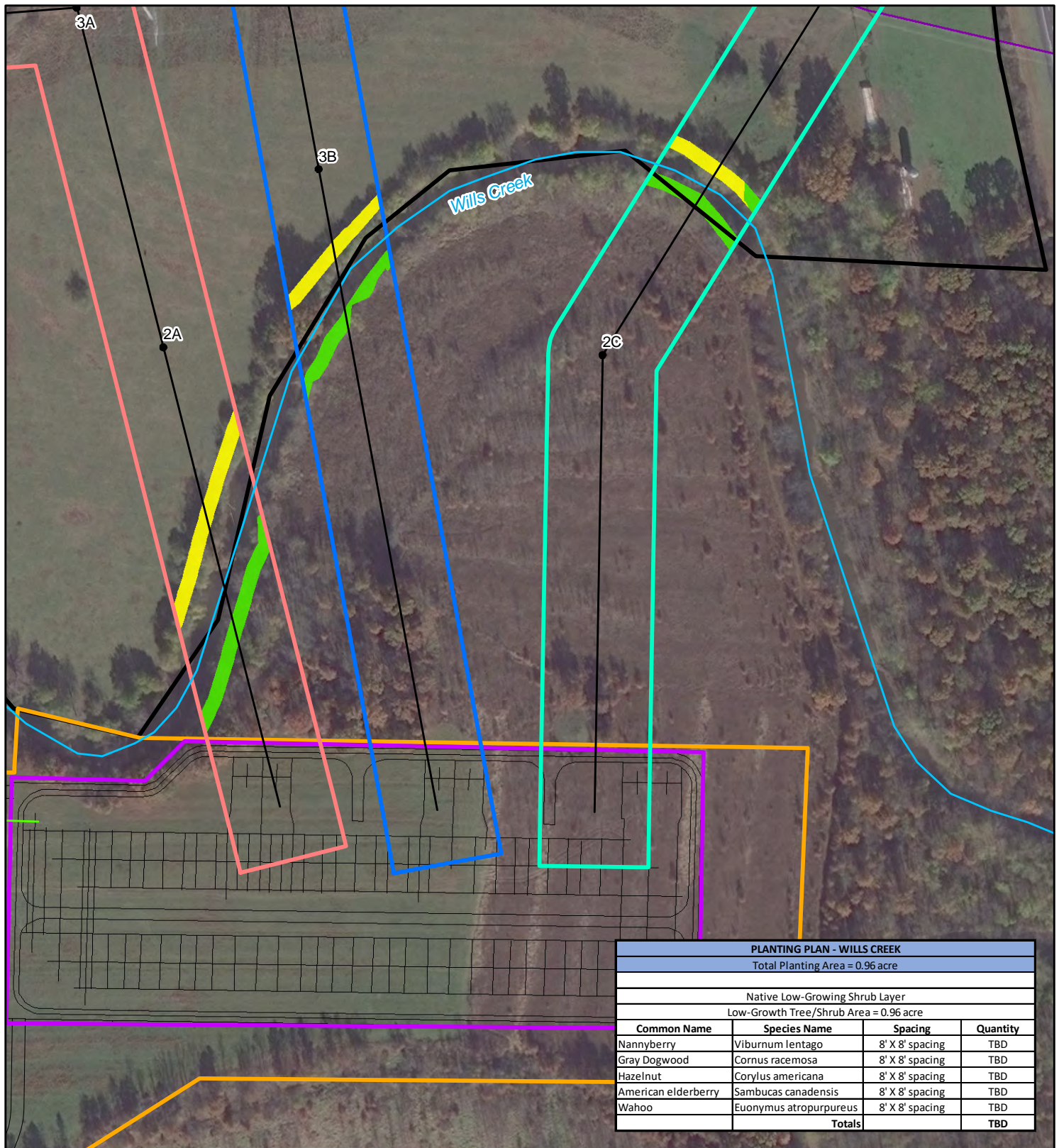
The proposed shrub plantings, if required, will consist of native species as specified on the Planting Plan Table shown on the attached figure. Low-growing species will be used to minimize the need for vegetation maintenance relative to the proximity of the Project. Upon evaluation of the remaining tree stumps and prior to planting, a detailed planting plan will be established for each area. In rocky areas or areas considered unsatisfactory for planting, the planting spacing will be adapted to best suit the conditions. Once planting is completed, including herbaceous seeding to further stabilize the ground surface in the riparian area, appropriate watering and care will be implemented to promote successful growth and establishment. BMPs will not be removed until the ground surface has been stabilized.

The vegetation clearing zones within the wetland areas (green shaded areas on attached figure) will be included in the annual vegetation monitoring and reporting, required under the Ohio EPA 401 water quality certification, for up to a 2-year period. The reporting will include:

- The status of all restoration required for the Project;
- A list of the specific native vegetation species planted in each area;
- Percent coverage of invasive species in the revegetation area and comparison to pre-impact conditions; and
- Photographs of the restored areas to accurately depict the condition of each area.

The cleared wooded non-wetland areas (yellow shaded areas on attached figure) will also be inspected during the same monitoring period to verify vegetative growth. Should vegetation fail to thrive, replanting will occur. Invasive species control, as necessary, will be implemented.

Following the monitoring period, no further monitoring or vegetation management is anticipated.



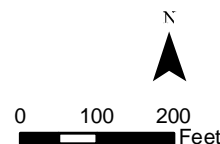
Legend

- Generating Facility Site
- Interconnection Property
- Utility Switchyard
- Existing Transmission/ Subtransmission Lines

- Interconnection ROW
- Western Line Tap ROW
- Eastern Line Tap ROW
- Proposed Transmission Line
- Proposed 69kV Line
- Proposed Pole Location

- Wooded Riparian Area (wetland)
- Wooded Riparian Area (non-wetland)

Imagery Source: NAIP 2015



Stream Restoration Plan



Guernsey County, Ohio

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/2/2020 3:54:24 PM

in

Case No(s). 17-1828-EL-BLN

Summary: Correspondence of Guernsey Power Station, LLC in Compliance with Staff Report Condition No. 7 - Updated Streamside Vegetation Restoration Plan electronically filed by Teresa Orahod on behalf of Dylan F. Borchers