

**LETTER OF NOTIFICATION  
FOR THE  
  
PIERCE SUBSTATION  
TRANSMISSION LINE F4502  
RELOCATION PROJECT**

**Duke Energy Ohio, Inc.  
PUCO Case No. 20-1778-EL-BLN**

**Submitted to:**

**The Ohio Power Siting Board**

**Pursuant to OAC 4906-06-05**

**Submitted by:**

**Duke Energy Ohio, Inc.**

**December 2020**



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**LETTER OF NOTIFICATION**

This Letter of Notification has been prepared by Duke Energy Ohio, Inc. (hereafter "Duke Energy Ohio") in accordance with Ohio Administrative Code (OAC) Section 4906-6-05 for the review of Accelerated Certificate Applications for the Pierce Substation Transmission Line F4502 Relocation (Project). The following sections correspond to the administrative code sections for the requirements of a Letter of Notification.

**4906-6-05(B) GENERAL INFORMATION****4906-6-05(B)(1) Project Description**

**The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Letter of Notification application.**

**Name of Project:**

Duke Energy Pierce Substation Transmission Line F4502 Relocation

**Reference Numbers:**

PUCO Filing Number:	The Project has been assigned Ohio Power Siting Board (OPSB) Case Number 20-1778-EL-BLN.
PJM Number:	This Project is a PJM Baseline Project and was assigned project number b2977.
2020 LTFR:	This project was included in the 2020 LTFR. The FE-T9 form is presented on page 91.
Circuit Reference:	This is assigned a Transmission Circuit F4502 Pierce-Foster, a 345kV transmission line.

**Brief Description of the Project:**

Duke Energy Ohio proposes the relocation of approximately 0.23-mile of Circuit F4502 Pierce-Foster, a 345kV transmission line, in support of the Pierce Substation Expansion Project (OPSB Case # 20-262-EL-BLN). The proposed relocation will require the installation of two (2) steel monopole structures on foundations in order to terminate the line on a new position on the existing Pierce Substation take-off structure. The installation of the structures is the second phase of necessary transmission line upgrades at the Pierce Substation to connect the reconfigured equipment within the expanded substation. The Project is in Pierce Township near New Richmond, within Clermont County, Ohio, adjacent to the existing Pierce Substation site.

The proposed relocation of Circuit F4502 Pierce-Foster 345-kilovolt (kV) at Duke Energy Ohio Pierce Substation is part of the substation expansion project that will allow for the installation of additional equipment to improve reliability, improve service to existing and future utility customers in the service area and addresses NERC criteria violations found for certain contingencies at the existing Pierce Substation.

Letter of Notification Requirement:

This Project qualifies as a Letter of Notification filing because it meets the requirements of OAC 4906-1-01, Appendix A, item (1)(b), *Application Requirement Matrix for Electric Power Transmission Lines*:

1. *New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*

(b) *Line(s) greater than 0.2 miles in length but not greater than two miles in length.*

**4906-6-05(B)(2) Statement of Need**

**If the proposed project is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.**

The proposed Duke Energy Ohio Pierce Substation Transmission Line is the second phase of the substation expansion project that will allow for the installation of additional equipment to improve reliability, improve service to existing and future utility customers in the service area, and address NERC criteria violations found for certain contingencies at Pierce substation.

This project is part of Duke Energy's long-range planning to identify and carry out enhancements to the electrical framework that will address reliability for our communities now and in the years ahead. This substation expansion project will provide the additional space required to reconfigure equipment within the Pierce Substation and install new equipment to modernize the substation. The expanded substation and subsequent transmission line installation will help increase the reliability of the energy network, as well as meet regulatory standards to serve electricity to homes, schools, hospitals and businesses in the area.

**4906-6-05(B)(3) Project Location**

**The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the Project area.**

The location of the Project is depicted in Attachment A – Project Details. Figure 1 shows the general project vicinity depicted on a USGS quadrangle topographic map. Figure 2 depicts the planned transmission line location, compared to existing transmission lines in the Project vicinity and additional details depicted on an aerial imagery map.

**4906-6-05(B)(4) Alternatives Considered**

**The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.**

The proposed Project will occur entirely within Duke Energy property and existing Duke Energy Ohio right-of-way (ROW) within Ohio Valley Electric Corporation (OVEC) property. No additional long-term impacts to adjacent properties are anticipated as a result of the Pierce Substation Expansion Project. Therefore, the current alignment is the only reasonable alternative available

#### **4906-6-05(B)(5) Public Information Program**

**The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.**

Information on the ongoing status of this Project and other Duke Energy Ohio projects can be found at the following website: <https://www.duke-energy.com/our-company/about-us/electrictransmission-projects>. Duke Energy Ohio is working with OVEC on the Project details and will provide written notice prior to beginning construction activities.

#### **4906-6-05(B)(6) Construction Schedule**

**The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.**

The previously proposed expansion of the substation, required prior to installation of the two (2) proposed structures (1A and 1B), began in August 2020 (PUCO Case #: 20-262-EL-BNR). Vegetation clearing for the current phase of the project will be required prior to structure installation and is tentatively planned for February 2021. Construction activities associated with this Project will include the installation of two structures for the transmission line relocation on the F4502 transmission line, tentatively planned to begin in March 2021 and anticipated to be completed by July 2022.

#### **4906-6-05(B)(7) Area Map**

**The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.**

Attachment A – Project Details depicts the general location of the Project. Figure 1 shows the general Project vicinity depicted on a USGS quadrangle topographic map. Figure 2 shows the planned transmission line location and additional details depicted on an aerial imagery map.

#### **4906-6-05(B)(8) Property Agreements**

**The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.**

This Project is located north of the existing Pierce Substation, which is located on Duke Energy Ohio property and property owned by OVEC. Duke Energy Ohio has existing agreements in place with OVEC to complete this Project and continue operating from this substation on Parcel IDs 272802C018 and 272802C019.

#### **4906-6-05(B)(9) Technical Features**

**The applicant shall describe the following information regarding the technical features of the project:**

Duke Energy Ohio proposes to install two (2) steel monopole structures (1A and 1B) and associated overhead work near the existing Pierce Substation expansion, planned for March 2021 in order to reconfigure of equipment within the substation. Construction will consist of the

realignment of an approximate 0.23-mile span of the existing 4502 line in support of the Pierce Substation Expansion Project.

**4906-6-05(B)(9)(a) Operating Characteristics**

**Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.**

This project consists of a realignment of the existing 345kV F4502 Pierce-Foster at Pierce Substation.

Voltage:	345 kilovolt (kV)
Structure Type:	Two (2) Steel monopole Structures (1A and 1B) with concrete foundations.
Conductors:	Bundled 954 ACSS/TW "Cardinal" [6 conductors; 2 conductors per phase]
Static Wire:	One (1) 7#8 Alumoweld
Insulators:	345 kV Glass insulators
Height:	STR 1A: 130' / STR 1B: 145'
ROW:	Within existing Duke Energy Ohio and OVEC property.

**4906-6-05(B)(9)(b) Electric and Magnetic Fields**

**For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line.**

No occupied residences or institutions are located within 100 feet of the proposed Project; therefore, no Electric and Magnetic Field (EMF) calculations are required by this code provision

**4906-6-05(B)(9)(b)(i) Calculated Electric and Magnetic Field Levels**

**Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way.**

No occupied residences or institutions are located within 100 feet of the proposed Project; therefore, no Electric and Magnetic Field (EMF) calculations are required by this code provision.

**4906-6-05(B)(9)(b)(ii) Design Alternatives for EMF**

**A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.**

No occupied residences or institutions are located within 100 feet of the proposed Project; therefore, no design alternatives were considered for the Project.

**4906-6-05(B)(9)(c) Project Cost**

**The estimated capital cost of the project.**

The estimated capital cost of the Project is \$2,000,000. This estimate includes vegetation clearing, grading, installation of the two new structures and associated linework to realign the Circuit 4502 (345 kV) transmission line into the existing Pierce Substation.

**4906-6-05(B)(10) Social and Ecological Impacts**

**The applicant shall describe the social and ecological impacts of the project:**

**4906-6-05(B)(10)(a) Land Use Characteristics**

**Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.**

The Project is located within Pierce Township within Clermont County. Pierce Township does not currently have a land use plan, but the Project is located adjacent to the existing Pierce Substation. New Richmond is to the south and west of the existing substation. On the other side (west) of State Route 52 is Duke Energy's Beckjord Generation Substation, which is located adjacent to the Beckjord generation station that is no longer owned or operated by Duke Energy.

**4906-6-05(B)(10)(b) Agricultural Land Information**

**Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.**

The project is located directly north of the existing substation, on the existing OVEC property and Duke Energy Ohio property. None of this area has been used for agricultural purposes. There will be no anticipated impacts to agricultural land as a result of the Project.

**4906-6-05(B)(10)(c) Archaeological and Cultural Resources**

**Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

A Cultural Resources Desktop Review was completed on October 26, 2020 for the area within a 0.5-mile radius of the Project Study Area. The OHPO records check indicated that one historic structure (CLE0069910) and one Phase I archaeological and historical survey (Pond Run Landfill Re-Permitting Project at Beckjord Station) were identified within a 0.5-mile radius of the Project Study Area. The identified historic structure is not within the Project Area footprint and is not listed on the National Register of Historic Places (NRHP) and no archeological resources were discovered or recorded during the identified Phase 1 survey. Since no cultural or historic resources were identified within the limits of the Project Study Area, no cultural or historic resources are anticipated to be impacted from project activities. The minimal impacts associated with the Project do not warrant additional cultural resource surveys based on the proposed scope of work. Refer to Attachment D – Cultural Resources Desktop Review.

**4906-6-05(B)(10)(d) Local, State, and Federal Agency Correspondence**

**Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.**

As the Project is expected to disturb greater than one acre, a National Pollutant Discharge Elimination System (NPDES) Construction Site General Permit from the Ohio Environmental Protection Agency (Ohio EPA) for the relocation is required. In addition to the Ohio EPA permit,

a Clermont County Building Permit may be required due to the proposed disturbance area.

**4906-6-05(B)(10)(e) Threatened, Endangered, and Rare Species**

**Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

Coordination with the U.S. Fish and Wildlife Service (USFWS) was initiated on October 20, 2020, in an effort to identify the Project's potential effect on any federally listed threatened or endangered species or critical habitat within a one-mile radius of the Study Area. A response from USFWS was received on December 8, 2020. The response from the USFWS indicated the federally listed endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) are found within the Project vicinity. Due to the project type, size, location, and the proposed implementation of seasonal tree cutting (clearing of trees  $\geq 3$  inches diameter at breast height between October 1 and March 31) to avoid impacts to the federally listed bat species, no adverse effects to any federally endangered, threatened, proposed or candidate species are expected to occur. A copy of the initial consultation letter to USFWS can be found in Attachment B – Rare, Threatened, and Endangered Species Correspondence.

**4906-6-05(B)(10)(f) Areas of Ecological Concern**

**Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

As a part of the investigation, GAI also conducted an investigation for areas of ecological concern. As a part of GAI's investigation, a request was submitted to the ODNR Natural Heritage Program on October 20, 2020, to research the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected areas within one mile of the Project area, using the ODNR Natural Heritage Database. A response from the ODNR – Office of Real Estate is currently pending.

As a part of the field investigation and ecological assessment, GAI conducted a Regulated Waters Assessment of the Project Area. GAI's investigation included approximately 0.23-mile by 200-foot wide Study Area around the proposed centerline, encompassing access roads, and additional workspace areas. During the investigation, GAI identified one (1) likely jurisdictional wetland within the Project's Study Area. Additionally, two (2) PEM wetlands were delineated by another firm, one within and one outside the Project Area, within Duke Energy Pierce Substation property. The locations of these two wetlands were within areas that are routinely maintained (mowed) and were not considered wetlands on the October 14, 2020 field review. Results from GAI's field investigation can be found in Attachment C – Regulated Waters Assessment (RWA). A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) revealed that no portion of the Project Area lies within a 100-year floodplain and/or floodway.



**4906-6-05(B)(10)(g) Unusual Conditions**

**Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.**

To the best of Duke Energy Ohio's knowledge, no unusual conditions exist that would result in environmental, social, health, or safety impacts. Construction and operation of the proposed Project will meet all applicable safety standards established by the Occupational Safety and Health Administration and will be in accordance with the requirements specified in the latest revision of the National Electric Code as adopted by the PUCO.

**4906-6-08 (A) Public Notice for Letter of Notification Applications**

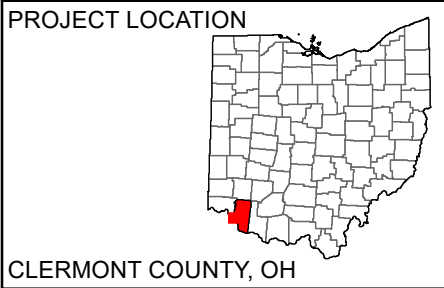
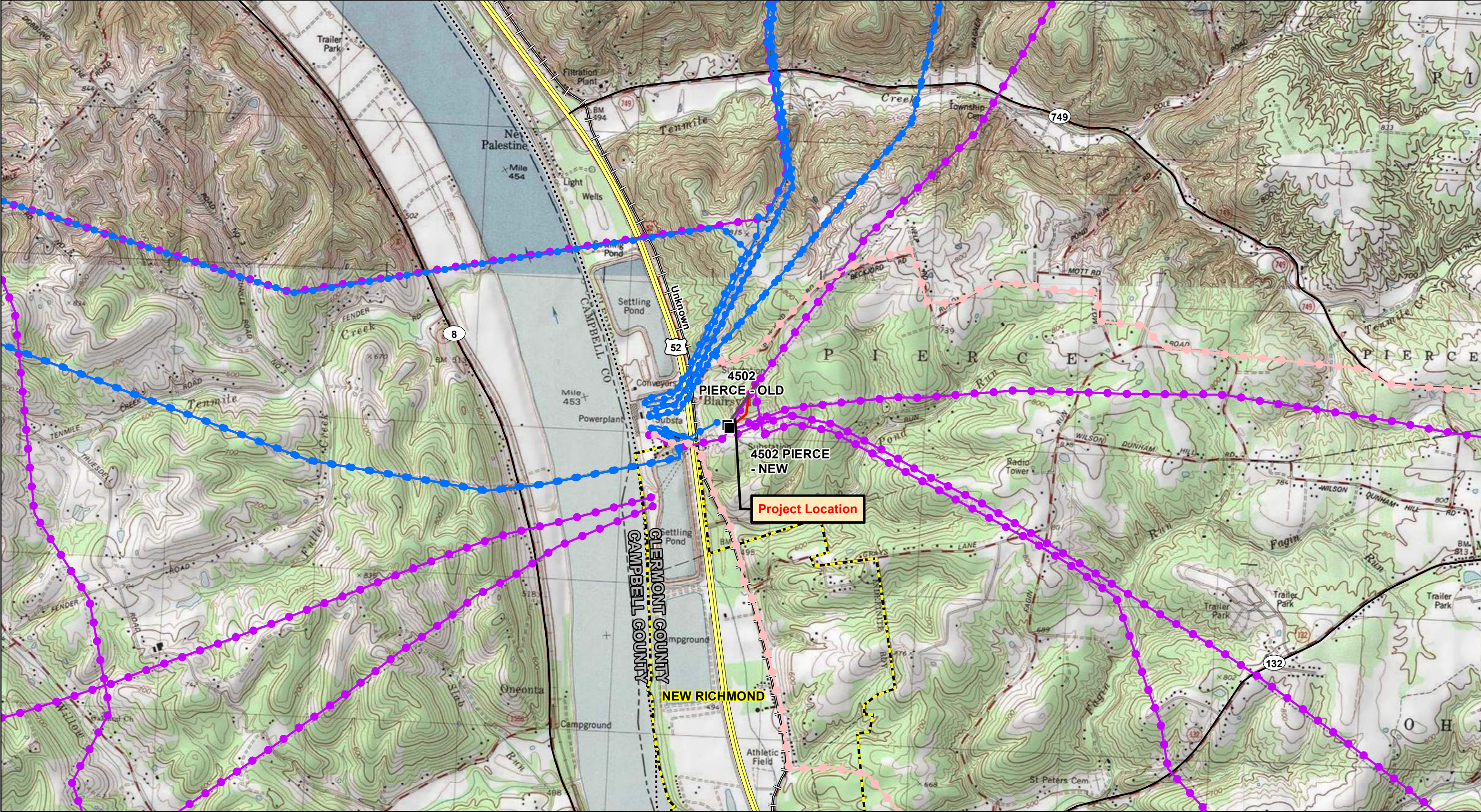
**Provide public notice in newspapers of general circulation in the project area and shall supply the board with proof of such publication no later than thirty days from the date of publication.**

A newspaper notice will be provided in the Cincinnati Enquirer within 7 days of filing this application, consisting of no less than a fourth of a standard page. Similarly, proof of publication within 30 days of the date of publication will be provided. Within seven days of filing this Letter of Notification (LON), notice will be sent to each property owner affected by the Project, with a description of the project, a map showing the location and layout of the Project, the location of where accessible copies of this LON are available, and a statement including the assigned docket number that this LON is now pending before the board. This letter will also describe how to participate and comment in the board's proceedings.

Copies of the Letter of Notification have been sent to the appropriate public officials for Clermont County and Pierce Township, as well as to the Clermont County Public Library.

## Attachment A – Figures





REFERENCE:  
TOPOGRAPHIC MAP:  
- Esri's USA Topo Map, Accessed: 12/16/2020.  
INCORPORATED AREA:  
- Ohio Department of Transportation's Cities, 9/11/2018.  
HIGHWAY:  
- Esri's U.S. Major Roads, 5/10/2018.  
RAILWAY:  
- Ohio Department of Transportation's Railroads, 9/11/2018.  
PROJECT DETAILS:  
- Duke Energy.

- |                   |                     |                                   |
|-------------------|---------------------|-----------------------------------|
| US Highway        | Existing Facility   | Existing 69 kV Transmission Line  |
| State Highway     | Existing Centerline |                                   |
| Railway           | Proposed Centerline | Existing 138 kV Transmission Line |
| Incorporated Area |                     | Existing 345 kV Transmission Line |
| County Boundary   |                     |                                   |

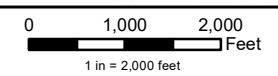


FIGURE 1  
PROJECT LOCATION

Ohio Power Siting Board Letter of Notification

Pierce Transmission Line Relocation Project

DRAWN BY: PPD  
CHECKED: TDB

DATE: 12/16/2020  
APPROVED: MRW







Attachment B – Rare, Threatened, and Endangered  
Species Correspondence

## Bradley Rolfes

---

**From:** Ohio, FW3 <ohio@fws.gov>  
**Sent:** Monday, December 7, 2020 5:36 PM  
**To:** Bradley Rolfes; Tyler Rankin; Anthony T. Glenn  
**Cc:** Parsons, Kate; nathan.reardon@dnr.state.oh.us  
**Subject:** Duke Energy Pierce Substation 4502 Line Relocation Project located in Clermont County, Ohio

**EXERCISE CAUTION: This is an External Email Message!**

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UNITED STATES DEPARTMENT OF THE INTERIOR  
U.S. Fish and Wildlife Service  
Ecological Services Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2021-TA-0422

Dear Mr. Rolfes,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees  $\geq 3$  inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, we recommend removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule

(see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio ([https://epa.ohio.gov/portals/47/facts/ohio\\_wetlands.pdf](https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf)). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at [mike.pettegrew@dnr.state.oh.us](mailto:mike.pettegrew@dnr.state.oh.us).

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or [ohio@fws.gov](mailto:ohio@fws.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice Ashfield", is positioned in the top left corner of the page.

Patrice Ashfield  
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW  
Kate Parsons, ODNR-DOW



## Tyler Rankin

---

**From:** Bradley Rolfes  
**Sent:** Tuesday, October 20, 2020 11:11 AM  
**To:** environmentalreviewrequest (environmentalreviewrequest@dnr.state.oh.us)  
**Cc:** Tyler Rankin; Anthony T. Glenn  
**Subject:** Environmental Review Request - Duke Energy Pierce Substation 4502 Line Relocation Project  
**Attachments:** Pierce\_Phase\_3\_0.5mi\_buffer.zip; M200162-Pierce\_4502-Relocate-20200911.kmz

Dear Staff,

On behalf of Duke Energy, I am submitting this email as an Environmental Review Request concerning any endangered, threatened, or candidate species and their critical habitat in the vicinity of the Duke Energy Pierce Substation 4502 Line Relocation Project located in Clermont County, Ohio. Attached to this email is a shapefile of a 0.5-mile buffer and a Google Earth KMZ of the proposed structures and project centerline area for your reference.

The proposed Project involves the re-alignment of an approximate 0.19-miles of the existing 4502 line in support of the Pierce Substation Expansion Project. Two (2) steel monopole structures (1A and 1B) will be installed north of the existing Pierce Substation. This project is the third phase of the previous two Pierce Substation expansion projects (sub expansion and T-line Relocation).

The habitat within the Project area consists of existing Duke Energy (OVEC) Substation Property, Existing Transmission line ROW, and upland forested land uses. Proposed forested clearing for the new transmission line ROW is planned to occur within the seasonal Bat Tree Clearing window (October 1 and March 31).

At your earliest convenience, please provide a formal response on the formal ODNR letterhead of results of the Environmental Review within the Project area so this information can be included with other required materials specific to Ohio Power Siting Board requirements.

Please do not hesitate to contact me if you have any questions or concerns.

Thank you,  
Brad Rolfes

**Bradley J. Rolfes, CNRP**  
Environmental Specialist

**GAI Consultants**, 11 Spiral Drive, Suite 8, Florence, KY 41042  
**T** 859.647.6647 **D** 859.795.2979 **M** 859.321.1058

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**GAI Consultants**

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## Attachment C – Regulated Waters Assessment



Northern Kentucky Office  
11 Spiral Drive  
Suite #8  
Florence, Kentucky 41042

T 859.795.2550  
F 859.647.6685

December 3, 2020

GAI Project No. R200879.00

Mr. Dane Vandewater  
Senior Permitting Specialist  
Duke Energy  
139 East 4<sup>th</sup> Street  
Cincinnati, OH 45202

**Regulated Waters Assessment  
Duke Energy Pierce Substation Transmission Line Relocation Phase 2 - F4502 (345kV)  
Project  
Duke Energy Project No. M20016203  
Clermont County, Ohio**

Dear Mr. Vandewater:

This report presents the findings of the regulated waters assessment and identifies the resulting anticipated regulatory permitting compliance requirements for the Pierce Substation Transmission Line Relocation Phase 2 - F4502 (345kV) Project (Project), located in Clermont County, Ohio (**Appendix A, Figure 1**). This field survey effort was done in support of due diligence as required for a Letter of Notification (LON), submitted to The Ohio Power Sitting Board (OPSB). Results from the regulated waters field survey are summarized below:

## **Project Summary**

The Project will require the relocation of an approximate 0.23-mile (~1,200 feet) span of 345kV line in support of the Pierce 4502 T-Line Relocation Project. The re-alignment will include the installation of two (2) steel monopole structures (1A and 1B) with concrete foundations (**Appendix A, Figure 2**). Photos of the Project Area can be found in **Appendix B**.

## **Work Summary**

A remote environmental screening review followed by an on-site field survey was completed by GAI Consultants Inc. (GAI) on October 14, 2020 in order to evaluate potential regulated waters impacts associated with the Project. These investigations were limited to an approximate 200-foot-wide corridor along the proposed realignment north of the existing Pierce Substation.

During the field survey, it was determined that all areas of the existing right-of-way (ROW) are accessible by construction equipment without significant grade improvements and are all located within routinely maintained existing ROW and Duke Energy Property.

## **Environmental Survey Results**

### **National Wetland Inventory (NWI)**

The United States Fish and Wildlife Service's (USFWS) National Wetland Inventory (NWI) maps were reviewed for potential wetland locations within the Project Area. The NWI maps were prepared from high altitude photography and, in most cases, were not field verified. As a result, wetlands are sometimes erroneously identified, missed, or misidentified within this data set. The presence of an NWI wetland

does not necessarily constitute the presence of a wetland meeting USACE criteria. The NWI map of the area identified one (1) NWI feature within the study area. The identified NWI feature crossed by the Project Study Area is PUBGh (Palustrine Unconsolidated Bottom Intermittently Exposed Diked/ Impounded) (See Figure 2).

### 100-Year Floodplain and Floodway

A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) revealed that the Project Area is not located within a mapped 100-year floodplain or floodway (see Figure 2).

### Wetlands

One (1) likely jurisdictional Palustrine Emergent (PEM) wetland was identified within the Project Area, totaling 0.10 acres. Additionally, two (2) PEM wetlands were delineated by another firm, one within and one outside the Project Area, within Duke Energy Pierce Substation property. The locations of these two wetlands were within areas that are routinely maintained (mowed) and were not considered wetlands on the October 14, 2020 field review and therefore no wetland data sheets were collected. Locations of the identified wetlands can be found in Appendix B - Figure 2, Resource Location. The identified wetland features are summarized in Table 1. Photos of the identified wetlands can be found in Appendix C.

### Waterbodies

To evaluate potential streams within the study area, GAI reviewed existing United States Geological Survey (USGS) topographic maps, aerial photography, National Hydrography Dataset (NHD) stream data, and site contour data.

No likely jurisdictional waterbodies were identified within the Project Area. However, multiple non-jurisdictional drainages were documented within and adjacent to the Project Area. These upland drainage features do not have an ordinary highwater mark (OHWM), lack hydrophytic vegetation, hydric soils, or other characteristics of a potentially regulated water. These documented drainages lie primarily within the existing, routinely maintained 4502 transmission line ROW. No permanent impacts to these drainage features are anticipated to occur as a result of construction activities.

It is GAI's opinion that construction activities as a result of this project will not affect and regulated waters and no additional permitting will be required.

**Sincerely,**  
**GAI Consultants, Inc.**



Tyler E. Rankin, MS, CNRP  
Senior Project Environmental Specialist

Attachments: Appendix A - Tables  
Appendix B - Figures  
Appendix C - Photographs

## **APPENDIX A**

### **Tables**

**Table 1.**

**Wetlands and Waterbodies Identified Within the Project Study Area**

<b>Feature Designation<sup>1</sup></b>	<b>Latitude<sup>2</sup></b>	<b>Longitude<sup>2</sup></b>	<b>Cowardin Classification<sup>3</sup></b>	<b>NWI Wetland Classification<sup>4</sup></b>	<b>Size of Wetland within Study Area (Acres)<sup>5</sup></b>	<b>Waters of the U.S.<sup>7</sup></b>
Wetland A	38.991127	-84.289223	PUBGh	PEM	0.10	Yes
Wetland B*	38.990742	-84.28904	N/A	PEM	0.00	Yes
Wetland C*	38.991285	-84.289803	N/A	PEM	0.03	Yes
<b>Total Wetland Acreage within Study Area</b>					<b>0.13</b>	

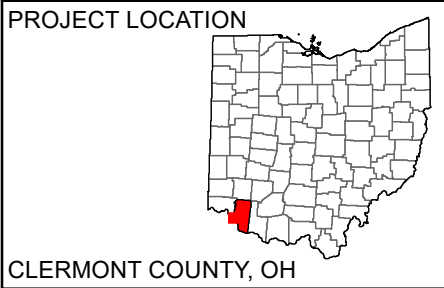
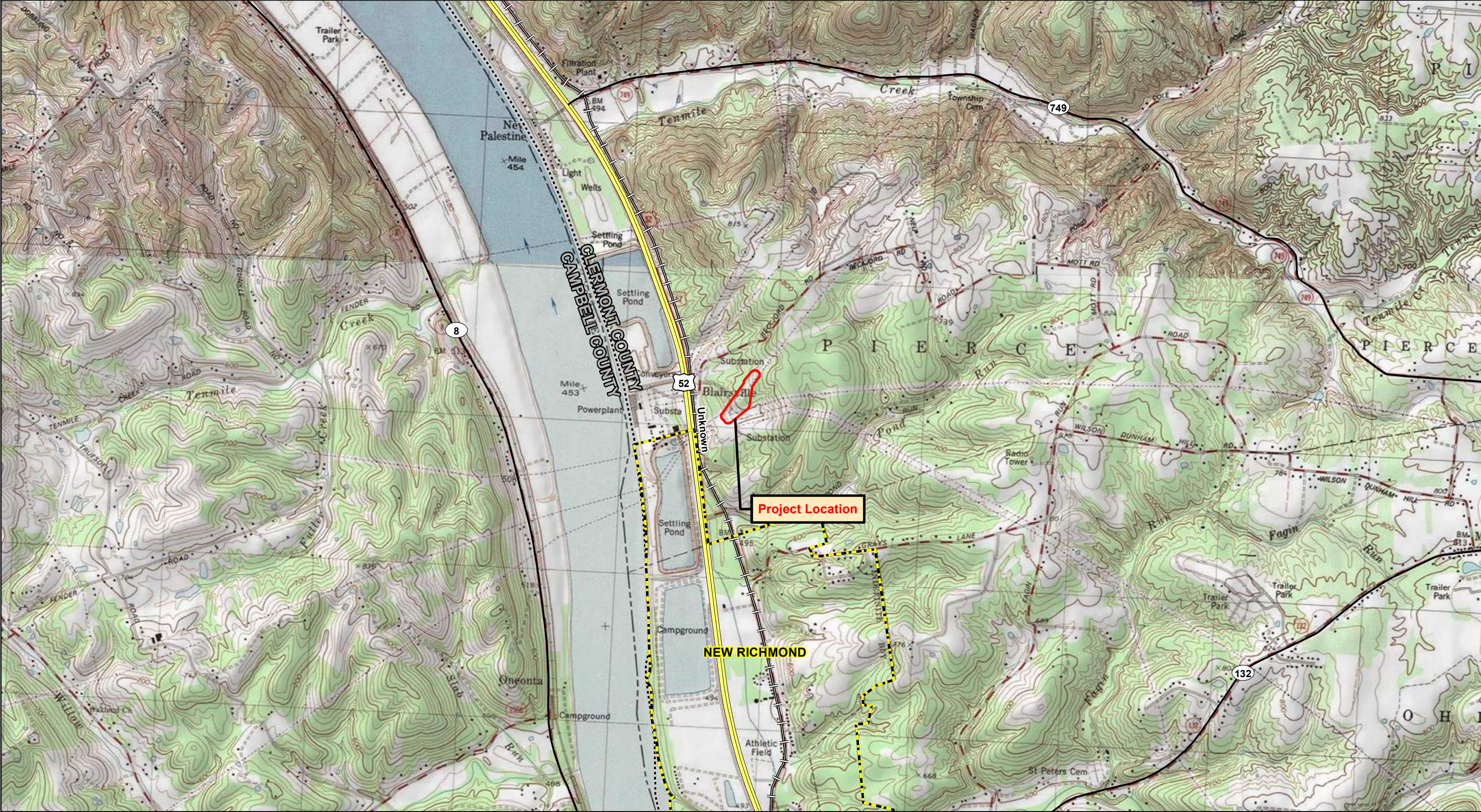
Notes:

1. GAI map designation.
2. Decimal degrees; Coordinates provided in NAD 83.
3. Palustrine system wetlands were classified as Emergent (PEM).
4. National Wetlands Inventory (NWI) wetland as mapped by the United States Fish and Wildlife Service.
5. Extent of wetland within study area. Wetland may extend beyond these limits if noted as open ended. An acreage of zero indicates a wetland was delineated but existed entirely outside the study area.
6. Wetlands residing within the limits of a Federal Emergency Management Agency (FEMA) designated 100-year floodplain or floodway.
7. Waters of the United States (U.S.) include the following: All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; all interstate waters including interstate wetlands; all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters: which are or could be used by interstate or foreign travelers for recreational or other purposes, from which fish or shellfish are or could be taken and sold in interstate or foreign commerce, or which are used or could be used for industrial purpose by industries in interstate commerce (33 CFR 328 and Supplementary Information).
8. \* Wetland delineated by another firm. No wetland datasheets collected.

## **APPENDIX B**

### **Figures**





REFERENCE:  
TOPOGRAPHIC MAP:  
Esri's USA Topo Map, Accessed: 12/16/2020.  
INCORPORATED AREA:  
Ohio Department of Transportation's Cities, 9/11/2018.  
HIGHWAY:  
Esri's U.S. Major Roads, 5/10/2018.  
RAILWAY:  
Ohio Department of Transportation's Railroads, 9/11/2018.  
PROJECT DETAILS:  
Duke Energy.

	US Highway		Study Area
	State Highway		
	Railway		
	Incorporated Area		
	County Boundary		

FIGURE 1  
PROJECT LOCATION

Regulated Waters Assessment Report

Pierce Transmission Line Relocation Project

DRAWN BY: PPD  
CHECKED: TDB

DATE: 12/16/2020  
APPROVED: MRW







## **APPENDIX C**

### **Photographs**

## Photographs



**Photograph 1. Wetland A. PEM. Looking North.  
(October 14, 2020)**



**Photograph 2. Wetland A. PEM. Looking East.  
(October 14, 2020)**



**Photograph 3. Wetland A. PEM. Looking Southeast.  
(October 14, 2020)**



**Photograph 4. Wetland A. PEM. Looking Northeast.  
(October 14, 2020)**



**Photograph 5. Approximate locations of Wetland B  
(Delineated by other). Facing South.  
(October 30, 2020)**



**Photograph 6. Approximate locations of Wetland C  
(Delineated by other). Facing East.  
(October 30, 2020)**





**Photograph 7. 4502 Line Existing ROW. Facing North.  
(October 14, 2020)**



**Photograph 8. 4502 Line Existing ROW. Facing South.  
(October 14, 2020)**

## Attachment D – Cultural Resources Desktop Review

## Duke Energy Pierce 4502 Line Project

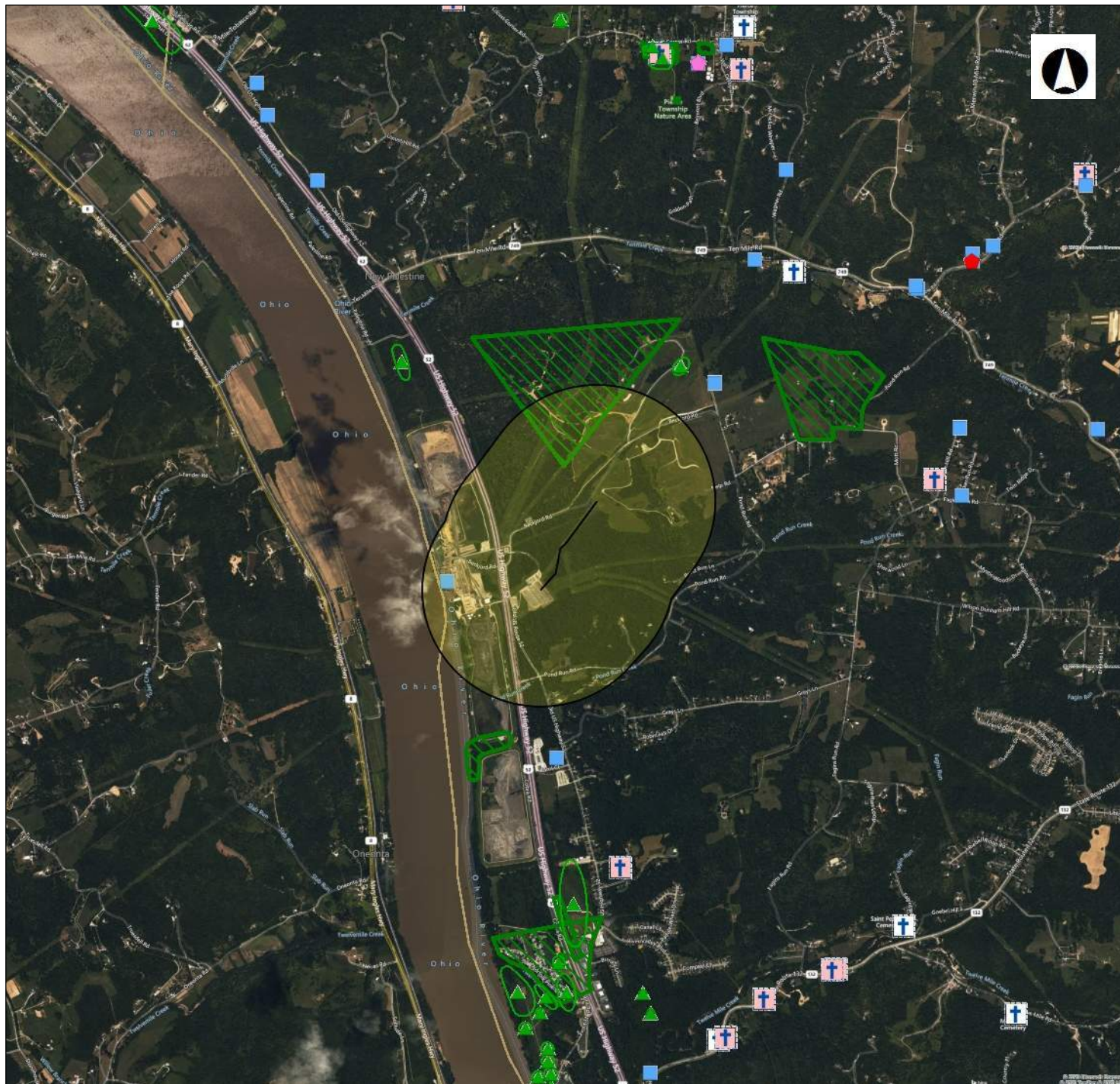
The Ohio History Connection, Ohio's Historic Preservation Office (OHPO) online mapping system, was consulted to identify previously recorded cultural resources within 0.8 kilometer (0.5 mile) of the Project Area (the Study Area). The OHPO records check indicates that one historic structure (CLE0069910) was previously recorded in the Study Area. The structure is not within the Project Area footprint and is not listed on the National Register of Historic Places (NRHP). No previously recorded archaeological sites are recorded in the 0.8-kilometer (0.5-mile) buffer.

In addition, a portion of a previous Phase I archaeological and historical survey falls within the 0.8 kilometer (0.5 mile) of the Project Area. This survey was done for the Pond Run Landfill Re-Permitting Project at Beckjord Station and intersects approximately 0.4 kilometer (0.25 mile) at the Northern boundary of the proposed Project Area. No resources were discovered or recorded during this survey.

It does not appear that a Federal Nexus, requiring further coordination with the OPHO, will occur for the Project, as there are likely no impacts to wetlands or streams that would require Federal permitting.

It does not appear that impacts to significant cultural resources will occur as a result of the Project. The minimal impacts associated with the Project do not warrant additional cultural resource surveys based on the proposed scope of work.





State Historic  
Preservation Office

### Legend

#### NR Listings

- Listed
- National Historic Landmark
- Delisted

#### Determinations of Eligibility

- DOE
- Demolished
- Archaeological Sites
- Historic Structures
- Historic Bridges

#### OGS Cemeteries

- Confident
- Not Confident

#### Historic Markers

- Dams

#### UTM Zone Split

- NR Boundaries

- OAI Site Boundaries

0 0.64 1.28 Miles

1: 50,851

### Copyright/Disclaimer

This map is a user generated static output from an Internet mapping site and is for general reference only. This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

Datum: [Datum]

Projection: WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/18/2020 11:02:14 AM**

**in**

**Case No(s). 20-1778-EL-BLN**

Summary: Application Duke Energy Ohio, Inc. submits its Application electronically filed by Mrs. Debbie L Gates on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco O. Mr. and Kingery, Jeanne W