

**LETTER OF NOTIFICATION
FOR THE
THE DAYTON POWER AND LIGHT COMPANY
D/B/A AES OHIO
CLINTON 345KV EXPANSION PROJECT
PUCO CASE No. 21-0679-EL-BLN**

**Submitted to:
The Ohio Power Siting Board
Pursuant to Ohio Administrative Code
Section 4906-6-05**

**Submitted by:
The Dayton Power and Light Company d/b/a AES Ohio
1900 Dryden Road
Moraine, Ohio 45439**



September 2021

4906-6-05: APPLICATION REQUIREMENTS

The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio") provides the following information to the Ohio Power Siting Board (OPSB) pursuant to Ohio Administrative Code (OAC) Section 4906-6-05.

4906-6-05: GENERAL INFORMATION**4906-6-05(B)(1): PROJECT NAME AND 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.

AES Ohio plans to install a second 345/69 kilovolt (kV) transformer at the Clinton Substation. This will also require the expansion of the existing Clinton Substation and addition of three 345kV breakers to establish a ring bus, 69kV circuit breakers, and associated equipment.

The proposed Clinton 345kv Expansion Project (the Project) will be located on a parcel entirely owned by AES Ohio.

The Project meets the requirements for a Letter of Notification (LON) because it is within the types of projects defined by OAC Rule 4906-1-01, Appendix A (Application Requirement Matrix for Electric Power Transmission Lines), Item (4)(b), which states the following:

- (4) Constructing additions to existing electric power transmission stations or converting distribution stations to transmission stations where:
 - (b) There is a greater than twenty percent expansion of the fenced area.

The Project has been assigned PUCO Case No. 21-0679-EL-BLN.

4906-6-05 (B)(2): NEED FOR THE PROJECT

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.

This Project is needed to relieve operational loading and reliability concerns on the 69kV system in the area for the loss of the Clinton source into the local area. Also, the Project will help improve operational flexibility through the addition of the second transformer and line allowing AES Ohio to take outages in the area for maintenance while keeping a source into the Wilmington area. Currently, there is only one 345/69kV transformer at Clinton Substation and it can be challenging to take outages in this part of the system due to the lack of local transmission or generation sources connected to the 69kV load centers. This Project is also needed to help ensure deliverability of the planned solar generation expansions along the Stuart-Clinton 345kV corridor. The AC1-085 solar generation project is currently under construction and will need to the extra transformer at Clinton to operate reliably and deliver generation into the transmission system.

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 Project is located at latitude 39.397674 °N, longitude 83.854788 °W in Union Township, Clinton County, Ohio. A site map of the proposed Project area is provided as Figure 1, included as part of the map are as follows:

- Aerial view of the proposed Project area showing the existing location of the Clinton Substation and the proposed expansion of the substation (Figure 1).

To reach the Project from the Columbus, Ohio area head south on I-71 S towards Cincinnati. After approximately 54 miles, take exit 50 for US-68 toward Wilmington. Turn left onto US-68 S and travel for 4.9 miles and turn right onto US-68 S / N South St. Proceed for 4.1 miles and turn left onto E Dalton Rd. After 230 feet, the Clinton Substation access road entrance is located on the right.

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 expands the existing substation where AES Ohio owns all the land required for substation expansion. As such, no additional alternatives were considered as the Project as planned represents the most suitable and least-impactful alternative. Assessments of impacts to existing socioeconomic, ecological, and land use conditions are further discussed in Section 4906-6-05 B (10).

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.

Construction of the substation expansion will be on existing AES Ohio property. AES Ohio will send a letter describing the proposed facility to each property owner adjacent to the Project area. A list of property owners contiguous to the Project area are included as Attachment A. AES Ohio maintains a website (<https://www.aes-ohio.com/transmission-improvements>) that provides the public information about the Project and how to request a copy of the LON. A copy of the LON will be served on the chief executive officer of the county and township, and the head of pertinent public agencies with the duty of protecting the environment or of planning land use in the area where the Project is located. A copy of the LON will also be served to the Wilmington Public Library of Clinton County Main Library and the Wilmington Public Library of Clinton County Clinton-Massie Library.

4906-6-05 (B)(6): CONSTRUCTION SCHEDULE

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

AES Ohio intends to commence construction activities on or around October 15, 2021, and anticipates that construction activities will be completed on or around May 31, 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.

An area map of the proposed Project is provided as Figure 2.

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.

The Project expands the existing substation where AES Ohio owns all the land required for substation expansion. No easements, options, or land use agreements are necessary to construct the Project or operate the facility.

4906-6-05 (B)(9): TECHNICAL FEATURES

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

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

The applicant shall provide operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The equipment and facilities to be installed within the Project will include the following:

- 345/69kV 250 megavolt amperes (MVA) Transformer
- Three 345kV circuit breakers
- Three 69kV circuit breakers
- Substation bus expansion
- Substation fence expansion by 3.8 acres (165,528 square-feet)

4906-6-05 (B)(9)(b): Electric 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.

There are no occupied residences or institutions within 100 feet of the proposed transmission line.

4906-6-05 (B)(9)(c): Estimated Costs

The estimated capital cost of the project.

The estimated transmission capital cost for the Project is \$6,100,000.

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 Uses

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 proposed Project is located in Union Township, Clinton County, Ohio. The proposed Project work is located on the same parcel of land where the existing Clinton substation is located. The land use at the Project area includes the existing substation and agricultural land. The proposed Project will impact existing land uses or future land uses at the proposed site in the Project area since 3 acres of agricultural land will no longer be farmed due to the substation expansion.

4906-6-05 (B)(10)(b): Agricultural Land

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 proposed Project will permanently impact approximately 3 acres of agricultural land. Once construction has been completed, it is anticipated that agricultural practices will not resume within the substation footprint. The Project does not affect any agricultural district land based on coordination with the Clinton County Auditor's Office on June 23, 2021.

4906-6-05 (B)(10)(c): Archaeological or 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.

Based on the current Project description, an Ohio Historic Preservation Office (OHPO) cultural resources consultation letter (Attachment B) for the Project was submitted by Arcadis, U.S., Inc. (Arcadis) on July 2, 2021. OHPO concurrence was received on July 21, 2021. The consultation

letter considered both direct and indirect effects when developing the Area of Potential Effect (APE) for the Project. The direct APE is limited to the Project impacts associated with the ground disturbance. The Project does involve the construction of new above ground facilities; however, it is not expected that the surrounding viewshed (indirect APE) will be visually impacted by the Project because of the generally rural setting and presence of existing modern infrastructure (i.e., Clinton Substation and electrical transmission towers) of similar height and construction. Therefore, the construction of the expansion is not likely to cause new visual impacts to the surrounding landscape. The viewshed (or indirect APE) was evaluated using a 500-foot buffer around the direct APE.

Background research was conducted using the OHPO online mapping database to locate previously recorded cultural resources and investigations within a one-mile radius of the Project APE. Information collected included archaeological sites, architectural and historical resources, Determination of Eligibility (DOE) files, National Register of Historic Places (NRHP) properties, National Historic Landmarks, historic cemeteries, historic bridges and previous cultural resources surveys. Historic-era mapping and aerial imagery available for the Project area was also reviewed.

Results of the background research identified one prehistoric archaeological site within one mile of the Project. The identified archaeological site (33CN0005) is a Woodland mound located approximately 0.5-mile southeast of the Project on a small terrace of Cowan Creek.

No known cultural resources or previous surveys were documented within the Project APE. A review of historic-era mapping indicates that Clinton County, especially Union Township, contained a high degree of prehistoric sites, most notably along floodplains and uplands surrounding established waterways that are similar to the Project APE. Historically, the Project area was rural farmland and there is no indication of historic structures present within the overall Project APE.

The Project APE is considered to contain a low probability of identifying historic properties based on the following:

- There are no known cultural resources within the overall Project APE;
- There are no historic-era above ground resources within the indirect APE;
- A large portion of the direct APE has been previously disturbed by the construction of existing facilities; and
- The soils within the direct APE not disturbed by existing facilities are documented as shallow Ap horizon soils underlain by subsoil. Fincastle silt loams (FnA) contain a shallow plowzone layer (approximately 10 inches) underlain by a thin E horizon (likely due to poorly drained soil) on top of subsoil. Treaty silty clay loams (TrA) contain a shallow plowzone layer (approximately 10 inches in depth) underlain by a thin A horizon on top of subsoil. These soils are frequently ponded.

Based on the results in the OHPO consultation letter, which was submitted on July 2, 2021, it is anticipated that the Project should not adversely affect historic properties within the direct or indirect APE. OHPO concurrence was received on July 21, 2021 stating that the Project will have no effect on historic properties and no further coordination is necessary (Attachment B).

4906-6-05 (B)(10)(d): Local, State, and Federal Requirements

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.

A summary of anticipated environmental permits and authorizations for the Project is provided in the table below. No other government agency requirements are known at the time of this filing.

Table 1. Clinton 345kV Expansion Project Anticipated Environmental Permits

Agency	Approval/Clearance/Authorization	Agency Review Time	Comments
USACE – Huntington District	Clean Water Act Section 404 Permit – Nationwide Permit (NWP) 57 - Electric Utility Line and Telecommunications Activities	N/A	Approximately 0.08 acres of wetland and 241 linear feet of streams are located within the Project area and will be impacted. Since impacts are less than or equal to 0.10 acres, and there are no Section 10 waterbodies, national/wild scenic rivers, or waters of special concern are in the Project area, nor is the Project located in a listed township, per NWP Regional General Condition 5, the Project is anticipated to be automatically authorized by USACE under NWP 57, without the submittal of a pre-construction notification (PCN). It should also be noted that one ephemeral stream, totaling 189 linear feet, was identified within the Project area. Under current regulatory guidance, ephemeral streams are not considered jurisdictional waters by the USACE.
U.S. Fish and Wildlife Service (USFWS)	Federally Listed Endangered Species Review	N/A	A USFWS Information, Planning and Conservation System (IPaC) database review for the Project was completed on November 2, 2020 (Attachment C).
Ohio Department of Natural Resources (ODNR) Office of Real Estate	Environmental Review (State T&E Species Consultation and Clearance)	60 days	An ODNR environmental review request was submitted on December 1, 2020. A response was received on February 8, 2021 (Attachment D).

Agency	Approval/Clearance/Authorization	Agency Review Time	Comments
Ohio Historic Preservation Office (OHPO)	Cultural and Architectural Resources Review	30 days	A cultural resources consultation letter was submitted to the OHPO on July 2, 2021. An OHPO response was received on July 21, 2021, stating that the Project will have no effect on historic properties and no further coordination is necessary (Attachment B).
Ohio Environmental Protection Agency (OEPA)	Clean Water Act Section 401 Review	45 days	At this time the USACE has unilaterally determined that the OEPA waived 401 certifications therefore, the USACE is proceeding without requiring any 401 water quality certifications for the sixteen NWP's in question in Ohio, including NWP 57.
	Isolated Wetlands Permit	N/A	Approximately 189 linear feet of ephemeral stream will be impacted. Less than 300 feet of filling of or dredging in ephemeral (non-jurisdictional) stream impacts would not require the submittal of an OEPA Isolated Stream/Wetlands Permit.
	Stormwater General Permit for Discharges of Storm Water Associated with Construction Activity (OHC000005) Notice of Intent (NOI)	NOI should be submitted 21 days prior to the start of construction	The total area of disturbance for the proposed Project is greater than one acre. Therefore, coverage under OHC000005 is required.
Clinton County Soil and Water Conservation District	Erosion and Sediment Control Plan review	14-21 days	The total area of disturbance for the proposed Project is anticipated to exceed 20,000 square feet. Therefore, submittal of ESCP and SWPPP documents for review by the Clinton County Soil and Water Conservation District review is required.
Clinton County Building and Zoning	Engineering Drawing Review	14-21 days	A building and zoning permit is required for the proposed Project.

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

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.

The USFWS IPaC tool was completed on November 2, 2020, to determine if known occurrences of rare, threatened, or endangered species (T&E species) or their critical habitats are present within the Project area or its vicinity (Attachment C). The results of the IPaC are included as Table 2. An on-site habitat assessment was conducted during the wetland delineation survey on October 13-14, 2020, and on June 22, 2021. Documented site conditions were used to evaluate the Project area for the occurrence of potential habitat for the T&E species identified by the IPaC. Suitable habitat for these species is not located within the Project area.

An ODNR environmental review request was submitted on December 1, 2020 (Attachment D). A response from the ODNR received on February 8, 2021, indicated no records of State listed species were present within one-mile of the Project area but noted that Cowan Lake State Park is located within one-mile radius of the Project area. The Project was also noted by ODNR as being within the range of several other state and/or federally listed species, including the Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), little brown bat (*Myotis lucifugus*), tricolored bat (*Perimyotis subflavus*), club shell (*Pleurobema clava*), rayed bean (*Villosa fabalis*), snuffbox (*Epioblasma triquetra*), and the Iowa darter (*Etheostoma exile*). However, ODNR indicated that the species were not likely be impacted due to lack of habitat and type of work proposed.

Table 2, below, also includes the state-listed endangered or threatened species provided by ODNR. Based on proposed Project impacts and the lack of suitable habitat, state and federally listed species are not anticipated to be affected by the Project.

Table 2. Rare, Threatened and Endangered Species Occurrence

Common Name	Species Name	Federal Status	State Status	Potential Impacts
Indiana bat	<i>Myotis sodalis</i>	Endangered	Endangered	No caves or mines are located within the Project area. Limited tree clearing is proposed for the Project, however suitable habitat is not present. Therefore, no effects to the Indiana bat are anticipated Therefore, no effects to the Indiana bat, Northern long-eared bat, little brown bat, and tricolored bat are anticipated.
Northern long-eared bat	<i>Myotis septentrionalis</i>	Threatened	Endangered	
Little brown bat	<i>Myotis lucifugus</i>	—	Endangered	
Tricolored bat	<i>Perimyotis subflavus</i>	—	Endangered	
Club shell (mussel)	<i>Pleurobema clava</i>	Endangered	Endangered	There are no perennial stream impacts associated with the Project. Therefore, no effects to the Club Shell are anticipated.
Rayed Bean (mussel)	<i>Villosa fabalis</i>	Endangered	Endangered	There are no perennial stream impacts associated with the Project. Therefore, no effects to the Rayed Bean are anticipated.
Snuffbox (mussel)	<i>Epioblasma triquetra</i>	Endangered	Endangered	There are no perennial stream impacts associated with the Project. Therefore, no effects to the Snuffbox are anticipated.
Iowa darter (fish)	<i>Etheostoma exile</i>	—	Endangered	There are no perennial stream impacts associated with the Project. Therefore, no effects to the Iowa darter are anticipated.

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.

Environmental and ecological site assessments were conducted on October 13-14, 2020 and June 22, 2021. The land use at the Project area is a mix of industrial (utility ROW, substation, and associated facilities) with agricultural land. The Project area is surrounded by rural residential areas and agricultural fields. Vegetative communities at the Project area consist of agricultural field, upland scrub shrub, palustrine emergent (PEM) wetland, palustrine scrub shrub (PSS) wetland, and palustrine forested (PFO) wetland.

There are no national, state, or local parks or forests, designated or proposed wilderness areas, national or state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, or wildlife sanctuaries located within the Project area. There are also no Federal Emergency Management Agency (FEMA) designated floodplains.

Wetland and waterbody delineation surveys were conducted on October 13-14, 2020 and June 22, 2021 (see Attachment E). Arcadis identified two PEM wetlands (W-1 and W-2), totaling 0.02-acres; one 0.08-acre PEM/PSS/PFO wetland (W-3); and four streams (S-1, S-2, S-3, and S-4), totaling 475 linear feet within the environmental survey area (ESA). Of these features, approximately 0.08 acres of wetland and 241 linear feet of streams are located within the Project area and will be impacted. Based on the township the Project is in, acreage of the proposed impacts, as well as lack of waters of special concern, Section 10 waters, and national scenic/wild rivers in the Project area, PCN submittal to the USACE is not required. Additionally, at this time USACE has unilaterally determined that the OEPA waived certification therefore, the USACE is proceeding without requiring any 401 water quality certifications for the sixteen NWP in question in Ohio, including NWP 57. Therefore, no PCN submittal to the OEPA is required. It should also be noted that one ephemeral stream, having a total length of 189 linear feet, was identified within the Project area. Under current regulatory guidance, ephemeral streams are not considered jurisdictional waters by the USACE. Less than 300 feet of ephemeral (non-jurisdictional) stream impacts does not require the submittal of an OEPA Isolated Stream/Wetlands Permit.

4906-6-05 (B)(10)(g): Other Information/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 AES Ohio's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

**4906-6-07: DOCUMENTATION OF LETTER OF NOTIFICATION APPLICATION
TRANSMITTAL AND AVAILABILITY FOR PUBLIC REVIEW**

A copy of this LON has been provided, concurrently with this OPSB filing, to the departments and officials of Clinton County and Union Township listed below. A copy of this LON has been provided to the libraries listed below for public viewing.

Clinton County

Mr. Mike McCarty
Clinton County Board of Commissioners
46 S. South Street
Wilmington, OH 45177

Mr. Kerry R. Steed
Clinton County Board of Commissioners
46 S. South Street
Wilmington, OH 45177

Ms. Brenda K. Woods
Clinton County Board of Commissioners
46 S. South Street
Wilmington, OH 45177

Mr. Jeffrey B. Linkous, P.E., P.S.
Clinton County Engineer
1326 Fife Avenue
Wilmington, OH 45177

Clinton County Building and Zoning Department
111 S Nelson Avenue Suite 8 Entrance D
Wilmington, OH 45177

Clinton Soil and Water Conservation District
111 S. Nelson Avenue Suite 5
Wilmington, OH 45177

Union Township

Mr. Fred Stern
Township Trustee
311 N. Curry Road
Wilmington, OH 45177

Mr. Chad Custis
Township Trustee
2529 SR 134 N.
Wilmington, OH 45177

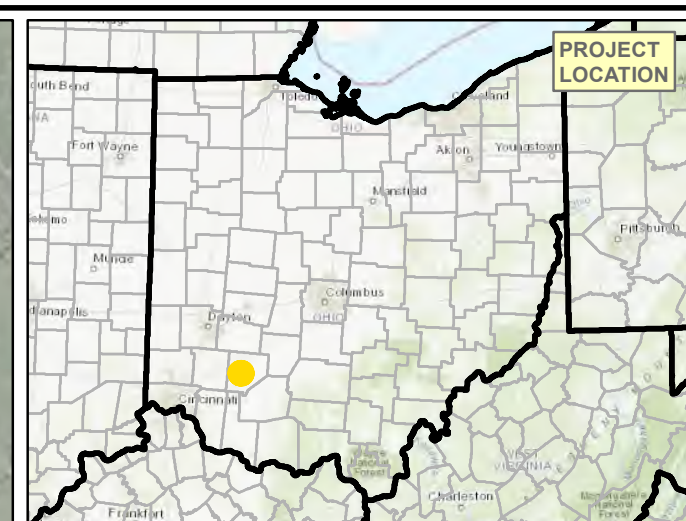
Mr. James Fife
Township Trustee
1099 E Ventura Drive
Wilmington, OH 45177

Libraries

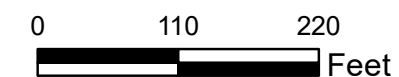
Wilmington Public Library of Clinton County (Main Library)
268 N South Street
Wilmington, OH 45177

Wilmington Public Library of Clinton County
Clinton-Massie Library
2556 Lebanon Road
Clarksville, OH 45113

Figures



- Legend**
- Existing 69kV Transmission Line
 - Existing 69kV Transmission Line
 - Township Boundary
 - Parcel Boundary
 - Proposed Fence Line Expansion



GRAPHIC SCALE

NOTE:
1. 2020 AERIAL IMAGERY PROVIDED BY ESRI STREAMING IMAGERY SERVICE.

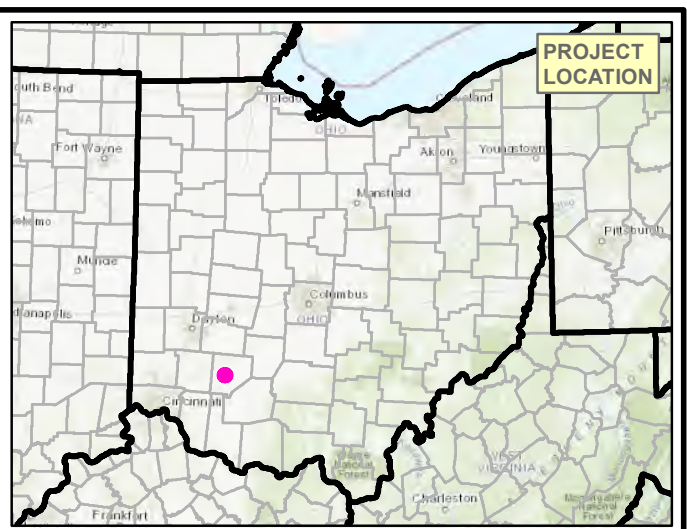
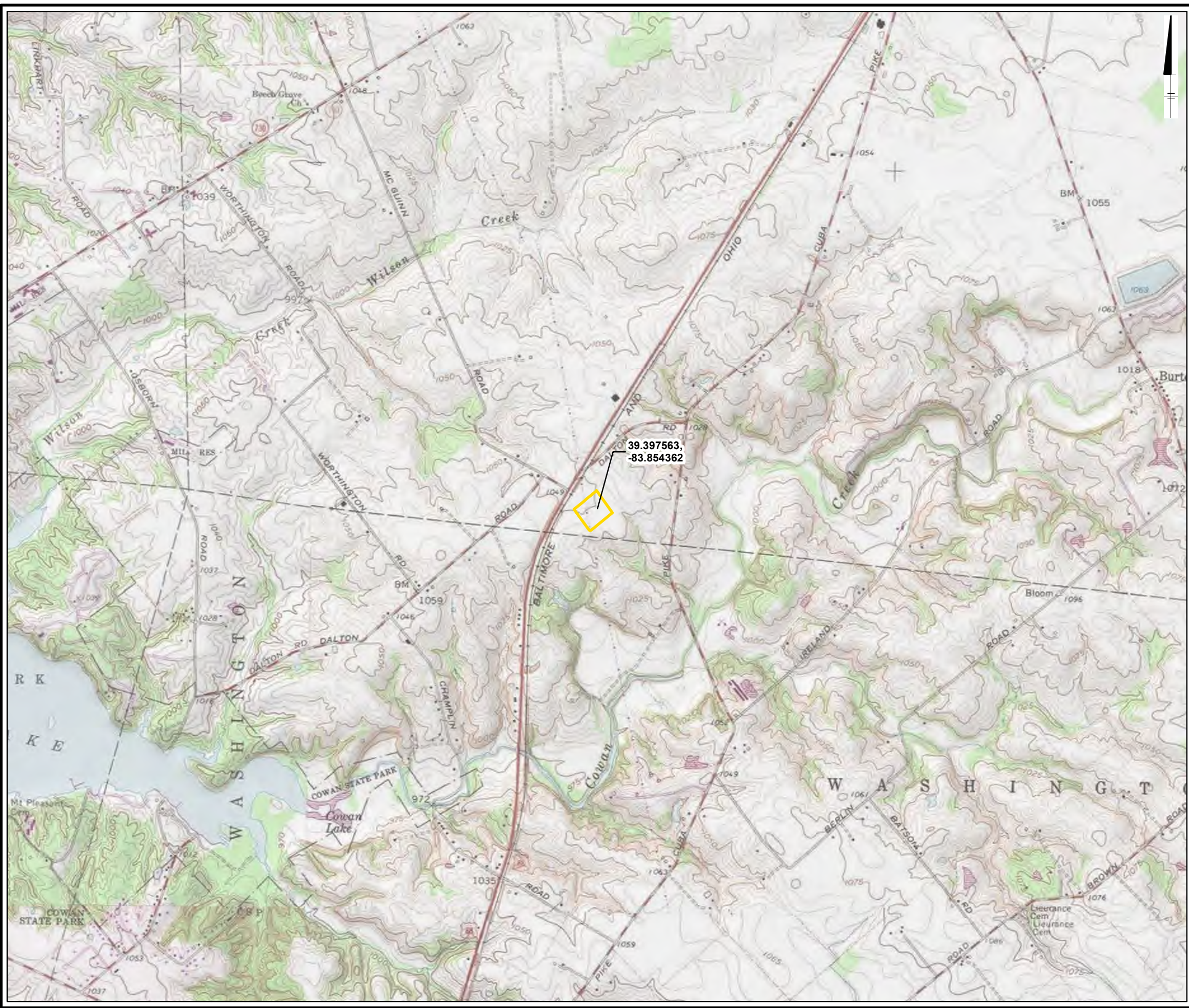
AES CORPORATION
CLINTON 345KV EXPANSION PROJECT
CLINTON COUNTY, OHIO

AERIAL MAP

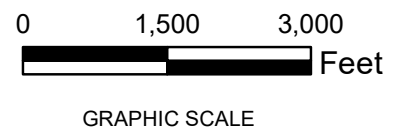


FIGURE
1

City: CIN Div/Group: EPP Created By: MVazquez Last Saved By: THahn
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Legend
Limits of Disturbance (LOD)



NOTE:
1. USGS TOPOGRAPHIC QUADRANGLE WILMINGTON, OHIO
OBTAINED FROM ESRI IMAGE SERVICE. PHOTO REVISED NOVEMBER, 1979.

AES CORPORATION CLINTON 345KV EXPANSION PROJECT CLINTON COUNTY, OHIO	
TOPOGRAPHIC MAP	
 AES	 ARCADIS
FIGURE 2	

Attachment A
Public Notification to Contiguous Landowners

Property Owners Contiguous to the Project

Parcel ID	Parcel Address	Owner Name	Owner Address
330020101000100	Worthington Rd Wilmington OH 45177	Jack L. Webb	P.O. Box 13828 Fort Pierce FL 34979-3828
270121028000000	124 E Dalton Rd Wilmington OH 45177	Michael T Smith & Thomas M Smith	124 E Dalton Rd Wilmington OH 45177
270121014000000	80 E Dalton Rd Wilmington OH 45177	Steven R & Annette Crampton	80 E Dalton Rd Wilmington OH 45177

Attachment B
Cultural Resources OHPO Consultation



In reply, refer to
2021-CLI-51974

July 21, 2021

Crista Haag
Arcadis
4665 Cornell Road, Suite 200
Cincinnati, OH 45241
Crista.haag@arcadis.com

RE: Dayton Power and Light Company, Clinton Substation Project, Union Township, Clinton County, Ohio

Dear Ms. Haag:

This is in response to the correspondence received July 2, 2021 regarding the proposed Dayton Power and Light Company's Clinton Substation Project in Union Township, Clinton County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The proposed undertaking involves the expansion of the Clinton Substation which will encompass 8.6 acres, including the current 5.1 acres of the existing substation and access. No previously identified cultural resources are located within the project area and there is a low potential significant cultural resources will be affected by the proposed project.

Based on the information submitted, it is our office's opinion the proposed project will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs.

If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorricks@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No. 1089182

Diana Welling
Department Head
Resource Protection and Review
Ohio Historic Preservation
Office Ohio History Connection
800 E. 17th Avenue
Columbus, Ohio 43211

Arcadis U.S., Inc.
4665 Cornell Road
Suite 200
Cincinnati Ohio 45241
Tel 513 860 8700
Fax 513 860 8701
www.arcadis.com

Subject:
Dayton Power and Light Company
Clinton Substation Project
Union Township, Clinton County, Ohio

Date:
July 2, 2021

Contact:
Crista Haag

Dear Ms. Welling:

Arcadis U.S., Inc. (Arcadis) is submitting this letter on behalf of Dayton Power and Light Company (DP&L), an AES Corporation company, for the Clinton Substation Project (Project) located in Union Township, Clinton County, Ohio (Figure 1). The Project involves the expansion of the existing Clinton Substation to install a second 345/69 kiloVolt (kV) transformer, three new 345kV breakers, and associated hardware. This expansion will encompass 8.6 acres; included within this total is 5.1 acres of the existing substation and access. The Project falls under jurisdiction of the Ohio Power Siting Board (OPSB) and subsequently, Ohio Revised Code, Sections 149.52-149.54.

Phone:
(513) 985-8012

Email:
crista.haag@arcadis.com

AREA OF POTENTIAL EFFECT

Arcadis considered both direct and indirect effects when developing the Area of Potential Effect (APE) for the Project (Figure 2). The direct APE is limited to the Project impacts associated with the ground disturbance totaling 8.6 acres. The Project does involve the construction of new above ground facilities; however, it is not expected that the surrounding viewshed (indirect APE) will be visually impacted by the Project because of the generally rural setting and presence of existing modern infrastructure (i.e. Clinton Substation and electrical transmission towers) of similar height and construction. Therefore, the construction of the expansion is not likely to cause new visual impacts to the surrounding landscape.

The viewshed (or indirect APE) was evaluated using a 500-foot buffer around the direct APE.

PREVIOUSLY RECORDED CULTURAL RESOURCES AND SURVEYS

Arcadis conducted background research for the Project using the OHPO online mapping database to locate previously recorded cultural resources and investigations within a one-mile radius of the Project. Information collected included archaeological sites, architectural and historical resources, Determination of Eligibility files, National Register of Historic Places (NRHP) properties, National Historic Landmarks, historic cemeteries, historic bridges, and previous cultural resources surveys.

Results of the background research identified one prehistoric archaeological site within one mile of the Project (Figure 3). The identified archaeological site (33CN0005) is a Woodland mound located approximately 0.5-mile southeast of the Project on a small terrace of Cowan Creek.

In addition to the OHPO records check, Arcadis also reviewed historic-era mapping available for the Project area. The table below (Table 1) lists the resources that were examined.

Table 1. List of Historic-Era Mapping Reviewed for the Project

Date	Publisher	Historic Map Title
1858	Walling, Rice & Moon	<i>Map of Clinton County</i>
1876	Lake, Griffing, & Stevenson	<i>Historical Atlas of Clinton County, Ohio</i>
1914	William C. Mills, Fred J. Heer	<i>Archeological Atlas of Ohio</i>
1931-2016	Unites States Geographical Survey	<i>Topographic Maps</i>

The Mills (1914) atlas documents prehistoric sites within Ohio, especially the location of no longer extant mounds, village sites, and earthworks. According to Mills (1914), Clinton County contains 112 archaeological sites including 93 mounds, one village site, and 10 earthwork enclosures. Union Township contains an overwhelming majority of the sites, including 46 mounds and one earthwork enclosure. The Project is located along the southern edge of a large concentration of mound sites, with several examples scattered across the floodplain and uplands around Cowan Creek (Figure 4).

The earliest historic-era mapping from 1858 depicts a primarily rural landscape with localized settlements in nearby Wilmington and Burtonsville (Figure 5). No structures were depicted within the Project APE. In 1876, the Project area remains the same and the Project APE appears to be under cultivation on large agricultural tracts (Figure 6). From the topographic mapping, the Project area remains relatively rural throughout the early 20th century. By this time, infrastructure development in the area is evident through the construction of the Baltimore and Ohio Southwestern Railroad. Around 1961, Route 68 has been constructed adjacent to the Project, following the Baltimore and Ohio Railroad and Cowan Lake had been dammed approximately 1.75 miles to the southwest. There is a transmission line constructed through the Project APE between 1973 and 1976, and by 1994 the existing substation is constructed (Figure 7). The buildings within the indirect APE appear to also be constructed at this time, with the ones closer to the

road appearing sometime after 1994. There is an expansion of this substation to the south sometime in early 2000. Present land use within the Project APE is divided between the existing substation and agricultural land.

CONCLUSIONS AND RECOMMENDATIONS

The Project involves the expansion of the existing Clinton Substation through the construction of a second 345/69 kV transformer, three new 345kV breakers, and associated hardware. The Project footprint totaling 8.6 acres is defined as the direct APE. The direct APE is level and situated within an existing substation, an existing access road, an existing railroad spur, brush and a wheat field (Photographs 1 to 7). The construction of the existing facilities has caused previous disturbance to approximately 5.8 acres of the direct APE (see Figure 7). The indirect APE includes a 500-foot buffer around the direct APE.

The background records check identified one previously recorded prehistoric mound within one mile of the Project. No known cultural resources or previous surveys were documented within the Project APE. A review of historic-era mapping indicates that Clinton County, especially Union Township, contained a high degree of prehistoric sites, most notably along floodplains and uplands surrounding established waterways that are similar to the Project APE. Historically, the Project area was rural farmland and there is no indication of historic structures present within the overall Project APE.

Based on the following:

- That there are no known cultural resources within the overall Project APE.
- There are no historic-era above ground resources within the indirect APE;
- That a large portion of the direct APE (5.8 acres or 67 percent) has been previously disturbed by the construction of existing facilities; and
- That soils within the direct APE not disturbed by existing facilities are documented as shallow Ap soils underlain by subsoil (Web Soil Survey 2021). Fincastle silt loams (FnA) contain a shallow plowzone layer (approximately 10 inches) underlain by a thin E horizon (likely due to poorly drained soil) on top of subsoil. Treaty silty clay loams (TrA) contain a shallow plowzone layer (approximately 10 inches in depth) underlain by a thin A horizon on top of subsoil. These soils are frequently ponded.

The Project APE is considered to contain a low probability of identifying historic properties.

Based on the results in this letter, the Project should not adversely affect historic properties within the direct or indirect APE. Arcadis respectfully requests that your office review the information provided and respond with your written concurrence that the proposed Project will not adversely affect historic properties. If you have any questions concerning this Project, please feel free to contact me at (513) 985-8012 or crista.haag@arcadis.com.

Diana Welling
July 2, 2021

Sincerely,

Arcadis U.S., Inc.

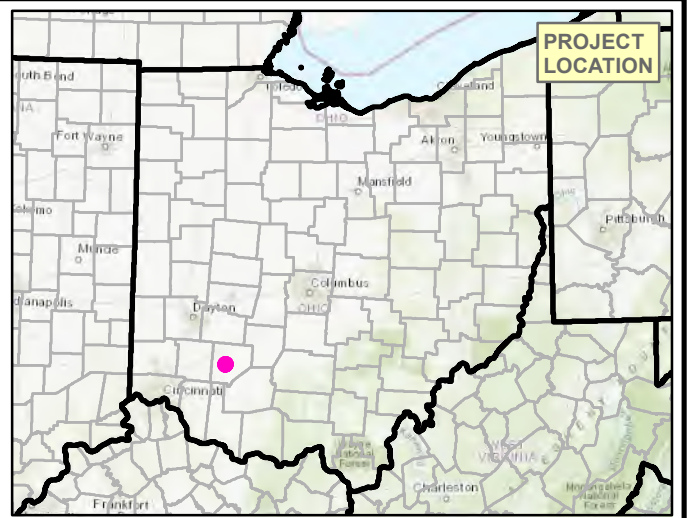
A handwritten signature in black ink, reading "Crista Haag". The signature is fluid and cursive, with the first name "Crista" and last name "Haag" clearly distinguishable.

Crista M. Haag, MA
Principal Investigator

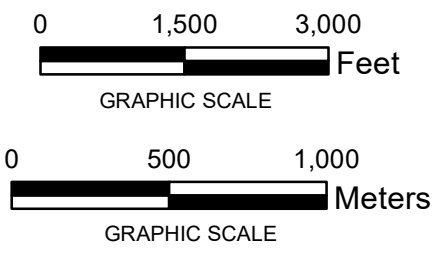
REFERENCES

Web Soil Survey, Natural Resources Conservation Service, United States Department of Agriculture.
Web Soil Survey. Available online at the following link: <http://websoilsurvey.sc.egov.usda.gov/>. Accessed [07/01/2021].

City: CIN Div/Group: EPP Created By: M Vazquez Last Saved By: KKeifer
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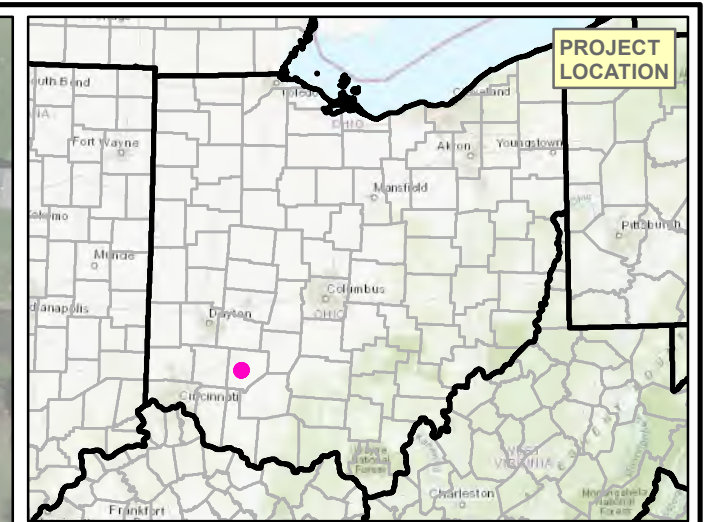
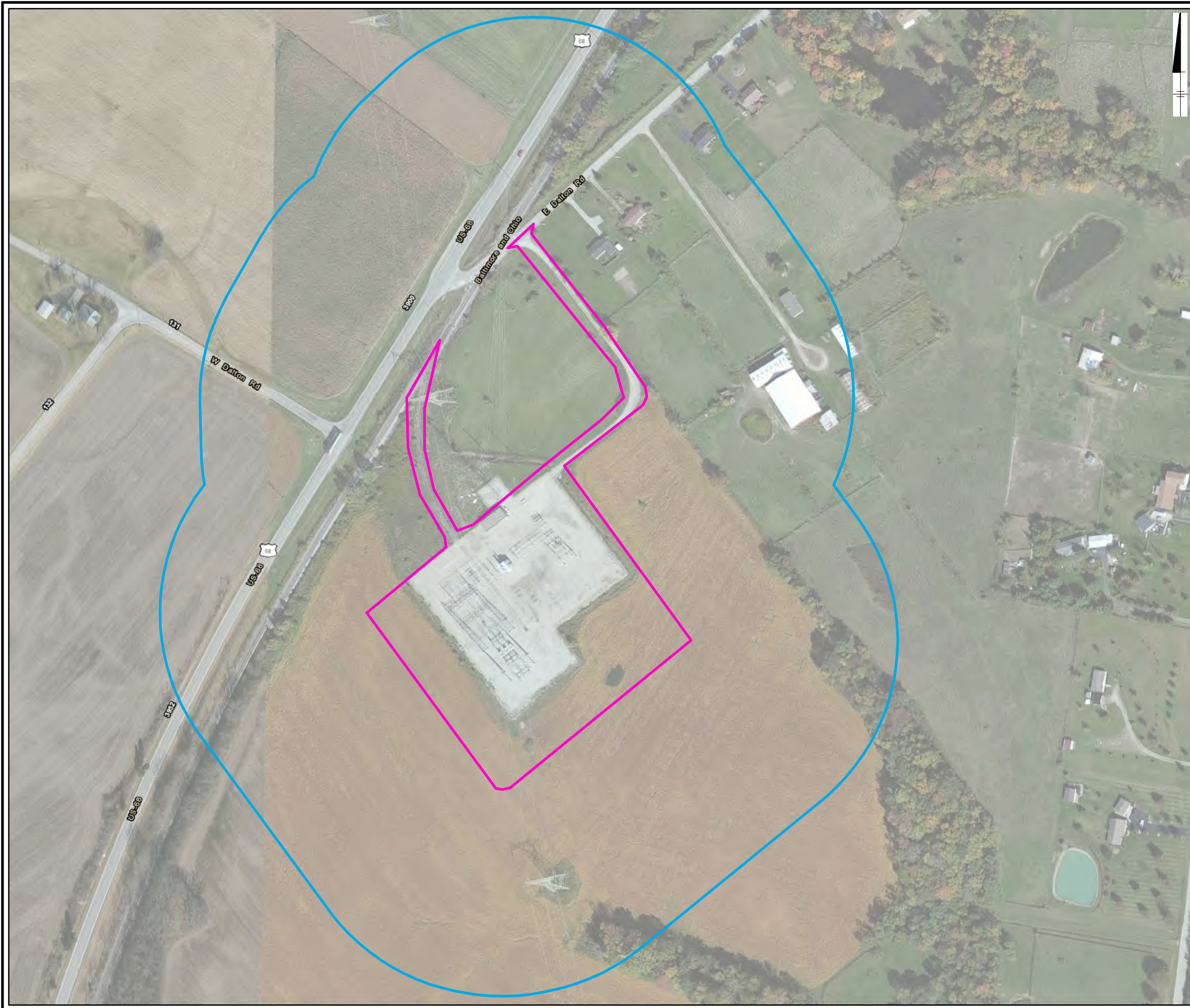


Legend
Project

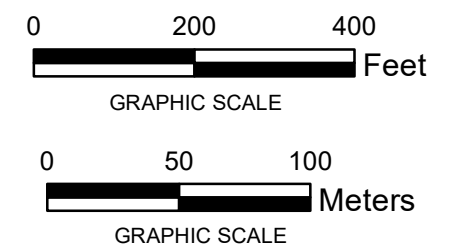


NOTE:
1. USGS TOPOGRAPHIC QUADRANGLE WILMINGTON, OHIO
OBTAINED FROM ESRI IMAGE SERVICE. PHOTO REVISED NOVEMBER, 1979.

THE DAYTON POWER AND LIGHT COMPANY CLINTON SUBSTATION PROJECT CLINTON COUNTY, OHIO	
PROJECT AREA	
	FIGURE 1



Legend
Direct APE
Indirect APE



NOTE:
1. 2017 AERIAL IMAGERY OBTAINED FROM ESRI IMAGE SERVICE.

THE DAYTON POWER AND LIGHT COMPANY
CLINTON SUBSTATION PROJECT
CLINTON COUNTY, OHIO

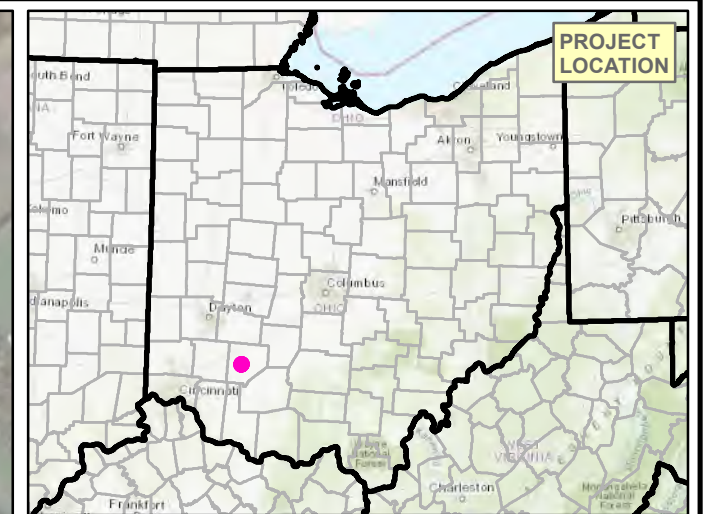
PROJECT APE



ARCADIS

**FIGURE
2**

City: CIN Div/Group: EPP Created By: M Vazquez Last Saved By: K Keifer
T:_EPP\DP\Clinton_Substation\MXD\Cultural\Tech_Memo\Figure3_Clinton_PrevResources.mxd 11/6/2020 9:02:52 AM



- Legend**
- Archaeological Sites
 - Direct APE
 - Indirect APE
 - 1 Mile Study Area
 - OAI Site Boundaries

0 1,000 2,000
Feet

GRAPHIC SCALE

0 300 600
Meters

GRAPHIC SCALE

NOTE:
1. 2017 AERIAL IMAGERY OBTAINED FROM ESRI IMAGE SERVICE.

THE DAYTON POWER AND LIGHT COMPANY
CLINTON SUBSTATION PROJECT
CLINTON COUNTY, OHIO

PREVIOUS CULTURAL RESOURCES



FIGURE
3

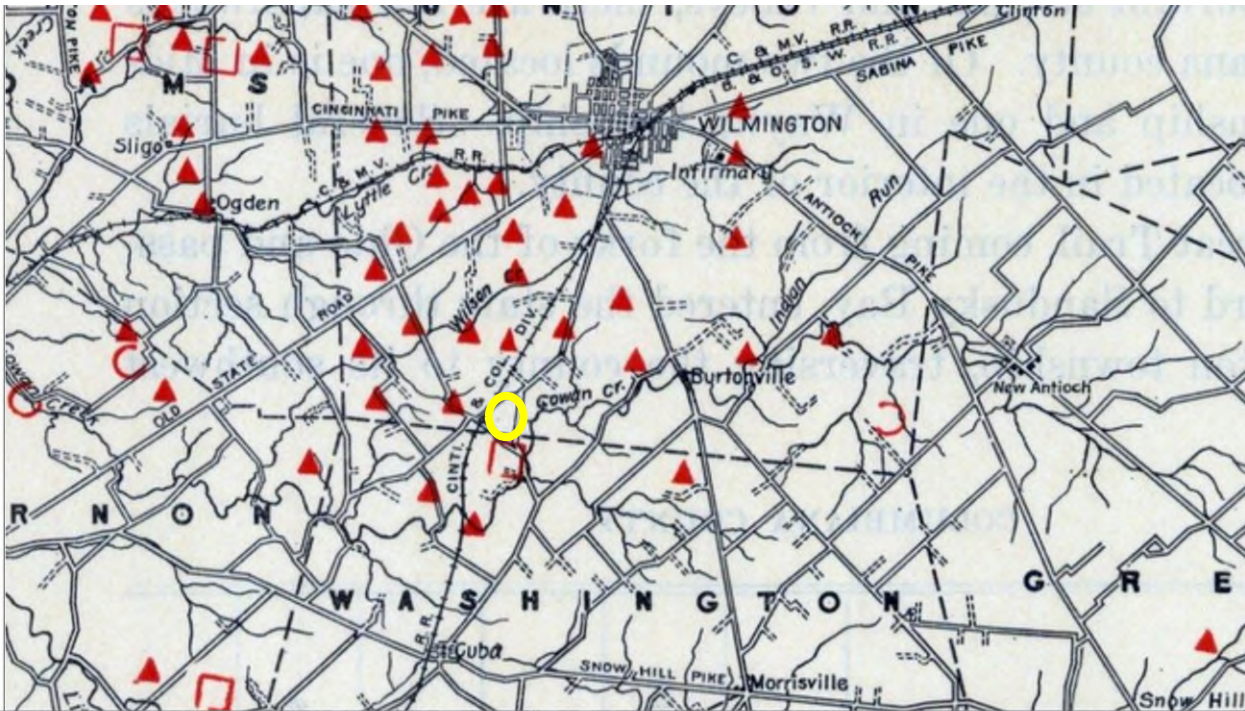


Figure 4. Mills (1914) atlas depicting Project Area (in yellow).



Figure 5. Clinton County 1859 Mapping depicting Project Area (in yellow).

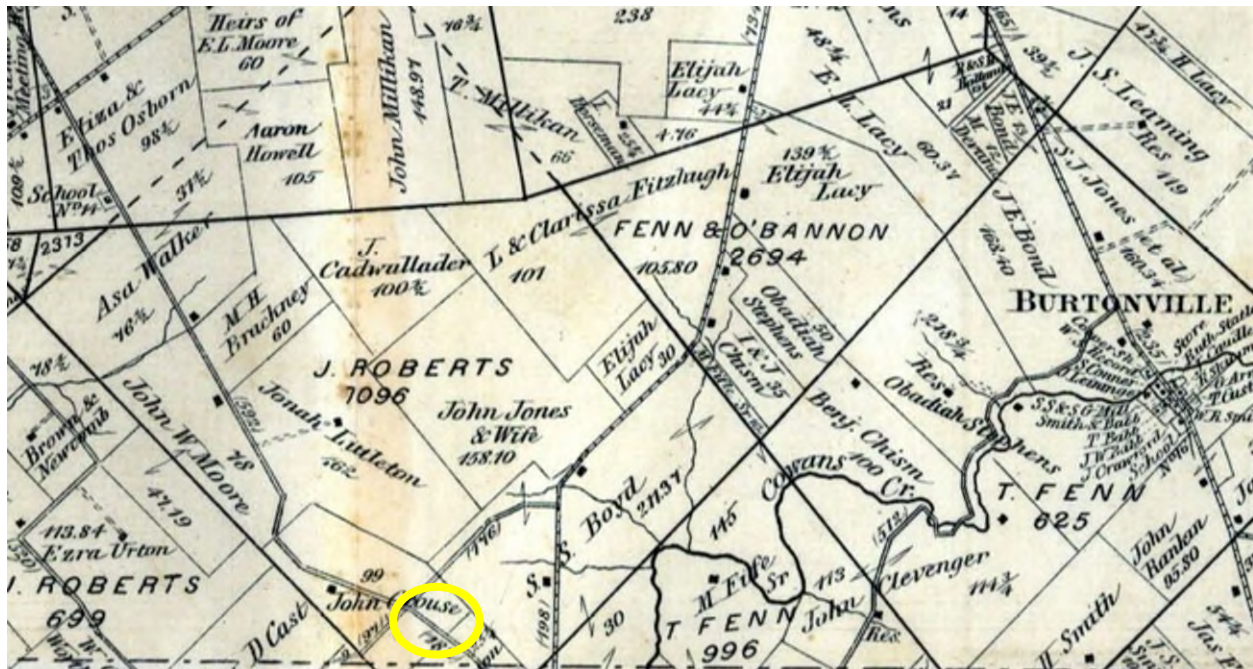


Figure 6. Clinton County 1876 Atlas depicting Project Area (in yellow).

Figure 7. 1994 Aerial Photograph

Legend



Photographs



Photograph 1. Overview of Existing Substation in Direct APE, from northeast corner facing southwest (June 22, 2021).



Photograph 2. Overview of Existing Substation in Direct APE, from southeast corner facing northwest (June 22, 2021).



Photograph 3. Overview of Existing Access in Direct APE, facing northeast (October 13, 2020).



Photograph 4. Overview of Railroad Spur in Direct APE (October 13, 2020).



Photograph 5. Overview of Direct APE, facing west (October 13, 2020).



Photograph 6. Overview of Direct APE, facing northwest (October 13, 2020).



Photograph 7. Overview of Direct APE, facing southeast (October 13, 2020).



In reply, refer to
2021-CLI-51974

July 21, 2021

Crista Haag
Arcadis
4665 Cornell Road, Suite 200
Cincinnati, OH 45241
Crista.haag@arcadis.com

RE: Dayton Power and Light Company, Clinton Substation Project, Union Township, Clinton County, Ohio

Dear Ms. Haag:

This is in response to the correspondence received July 2, 2021 regarding the proposed Dayton Power and Light Company's Clinton Substation Project in Union Township, Clinton County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are made pursuant to Section 149.53 of the Ohio Revised Code and the Ohio Power Siting Board rules for siting this project (OAC 4906-5). The comments of the Ohio SHPO are also submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

The proposed undertaking involves the expansion of the Clinton Substation which will encompass 8.6 acres, including the current 5.1 acres of the existing substation and access. No previously identified cultural resources are located within the project area and there is a low potential significant cultural resources will be affected by the proposed project.

Based on the information submitted, it is our office's opinion the proposed project will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs.

If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Krista Horrocks".

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No. 1089182

Attachment C
USFWS IPaC Report



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

Phone: (614) 416-8993 Fax: (614) 416-8994



In Reply Refer To:

November 02, 2020

Consultation Code: 03E15000-2021-SLI-0209

Event Code: 03E15000-2021-E-00284

Project Name: Clinton Substation

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <http://www.fws.gov/migratorybirds/RegulationsandPolicies.html>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/BirdHazards.html>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <http://www.fws.gov/migratorybirds/AboutUS.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

(614) 416-8993

Project Summary

Consultation Code: 03E15000-2021-SLI-0209

Event Code: 03E15000-2021-E-00284

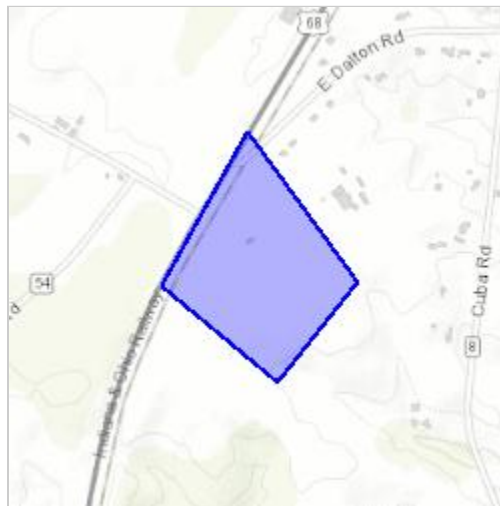
Project Name: Clinton Substation

Project Type: TRANSMISSION LINE

Project Description: Project involves the expansion of the existing Clinton Substation for installation of a new transformer, breakers, and associated hardware.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/39.39778398650299N83.85475055739212W>



Counties: Clinton, OH

Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none">▪ Incidental take of the northern long-eared bat is not prohibited at this location. Federal action agencies may conclude consultation using the streamlined process described at https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Attachment D
ODNR Environmental Review Request and
ODNR Environmental Review Response



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief

2045 Morse Road – Bldg. E-2

Columbus, OH 43229

Phone: (614) 265-6621

Fax: (614) 267-4764

February 8, 2021

Jason Steckel
Arcadis U.S., Inc.
4665 Cornell Road, Suite 200
Cincinnati, Ohio 45241

Re: 21-0016; Dayton Power and Light - Clinton Substation

Project: The proposed project consists of the expansion of the existing Clinton Substation for installation of a second 345/69 kilovolt (kV) transformer, three new 345kV breakers, and associated hardware.

Location: The proposed project is located in Wilmington and Washington Townships, Clinton County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following record at or within a one-mile radius of the project area:

Cowan Lake State Park – ODNR Division of Parks & Watercraft

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the “OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING”. <https://ohiodnr.gov/static/documents/wildlife/wildlife-management/Bat+Survey+Guidelines.pdf>

If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31, however, limited summer tree cutting may be acceptable after consultation with DOW (contact Sarah Stankavich, sarah.stankavich@dnr.state.oh.us).

The DOW also recommends that a desktop habitat assessment, followed by a field assessment if needed, is conducted to determine if there are potential hibernaculum(a) present within the project area. Information about how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that potential hibernacula are present within 0.25 miles of the project area, please send this information to Sarah Stankavich, sarah.stankavich@dnr.state.oh.us for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the following listed mussel species:

Federally Endangered

club shell (*Pleurobema clava*)

rayed bean (*Villosa fabalis*)

snuffbox (*Epioblasma triquetra*)

Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the Iowa darter (*Etheostoma exile*), a state endangered fish. The DOW recommends no in-water work in perennial streams from April 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact this or other aquatic species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at Sarah.Tebbe@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

Ms. Sarah Tebbe
Ohio Department of Natural Resources – Office of Real Estate
2045 Morse Road, Building E-2
Columbus, OH 43229-6693
Tel 614-265-6397
Sarah.Tebbe@dnr.state.oh.us

Arcadis U.S., Inc.
4665 Cornell Road
Suite 200
Indianapolis
Indiana 46204
Tel 513 860 8700
Fax 513 860 8701
www.arcadis.com

Subject:

**Environmental Review Request
Dayton Power & Light Company
Clinton Substation Project
Clinton County, Ohio**

Date:

December 1, 2020

Contact:

Jason Steckel

Phone:

317.236.2842

Email:

jason.steckel@arcadis.com

Ms. Tebbe:

On behalf of Dayton Power & Light Company (DP&L), Arcadis U.S., Inc. (Arcadis) requests an Environmental Review by the Ohio Department of Natural Resources Office of Real Estate regarding the potential impacts of the proposed Clinton Substation Project (the Project) on state-listed species.

BACKGROUND

The Project is located in Wilmington and Washington Townships, Clinton County, Ohio (39.397704°N, 83.854698°W) and consists of the expansion of the existing Clinton Substation for installation of a second 345/69 kilovolt (kV) transformer, three new 345kV breakers, and associated hardware (Attachment 1).

DP&L anticipates beginning construction in September 2021 and that the Project will be in service on June 1, 2022. Limits of Disturbance (LOD) for the Project will consist of the area proposed for expansion of the substation. During construction, stormwater runoff will be managed using the best management practices (BMPs) specified in the Stormwater Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plan (ESCP).

EXISTING CONDITIONS

Arcadis investigated the Project area during a site visit completed on October 13-14, 2020, to document existing vegetation communities and hydrologic conditions. Aerial mapping depicting aquatic features delineated within the ESA are provided

as Attachment 2 and representative photographs of the Project area are provided as Attachment 3. During the site investigation three wetlands and four ephemeral streams were identified within the ESA (Attachment 2).

Vegetative communities observed within the ESA consisted of agricultural field, upland scrub shrub, palustrine emergent (PEM) wetland, palustrine scrub/shrub (PSS) wetland, and palustrine forested (PFO) wetland. Site photographs are included as Attachment 3.

- Agricultural fields contained soybeans (*Glycine max*).
- Dominant vegetation in the upland scrub shrub areas included autumn olive (*Eleagnus umbellata*) and bush honeysuckle (*Lonicera maackii*).
- Dominant vegetation in the PEM portion of wetland consisted of curly dock (*Rumex crispus*), large barnyard grass (*Echinochloa crus-galli*), shallow sedge (*Carex lurida*), rice cutgrass (*Leersia oryzoides*), reed canary grass (*Phalaris arundinacea*), sycamore (*Populus deltoides*), and narrow-leaf cat-tail (*Typha angustifolia*).
- Dominant vegetation within the PSS wetland included shallow sedge, black willow (*Salix nigra*), and chufa (*Cyperus esculentus*).
- Dominant vegetation in the PFO portion of wetland consisted of black willow, narrow leaf cattail, and chufa.

No eagles or their nests were observed during field survey of the ESA.

PROPOSED IMPACTS

Proposed impacts resulting from the Project consist of the placement of fill material within 0.08 acre of PEM wetland, 0.01 acre of PSS wetland, and 0.01 acre of PFO wetland. Additionally, the Project will result in impacts to approximately 60 linear feet of ephemeral stream and 434 linear feet of intermittent stream. Proposed impacts will be permitted under Nationwide Permit (NWP) 12 - Utility Line Activities and a Pre-Construction Notification (PCN) will be submitted to the United States Army Corps of Engineers (USACE) Huntington District and the Ohio Environmental Protection Agency (OEPA).

FEDERAL CONSULTATION

In addition to this request for Environmental Review, Arcadis consulted the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online tool to determine the likelihood for threatened and endangered (T&E) species or T&E species habitat to occur within the Project area.

Results from the USFWS IPaC inquiry indicated that the site is located within the range of the federally threatened northern long-eared bat (*Myotis septentrionalis*) and federally endangered Indiana bat (*Myotis sodalis*). The results also indicate that the Project area contains no critical habitat for the identified species. No tree clearing is proposed for the planned substation expansion. Therefore, no impacts to bats are anticipated. The IPaC species list is included as Attachment 4.

CONCLUSIONS

Arcadis, on behalf of DP&L, is requesting comments from your office on potential effects of the proposed Project on state-listed species. If you have any questions or require additional information, please contact Jason Steckel at 317-236-2842 or via email at jason.steckel@arcadis.com.

Sincerely,
Arcadis U.S., Inc.



Jason Steckel
Project Ecologist

Copies:
Amanda Foti, Dayton Power & Light Company

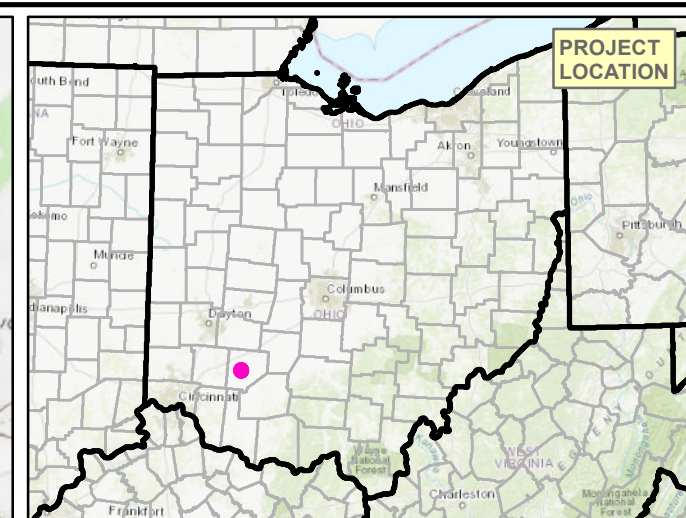
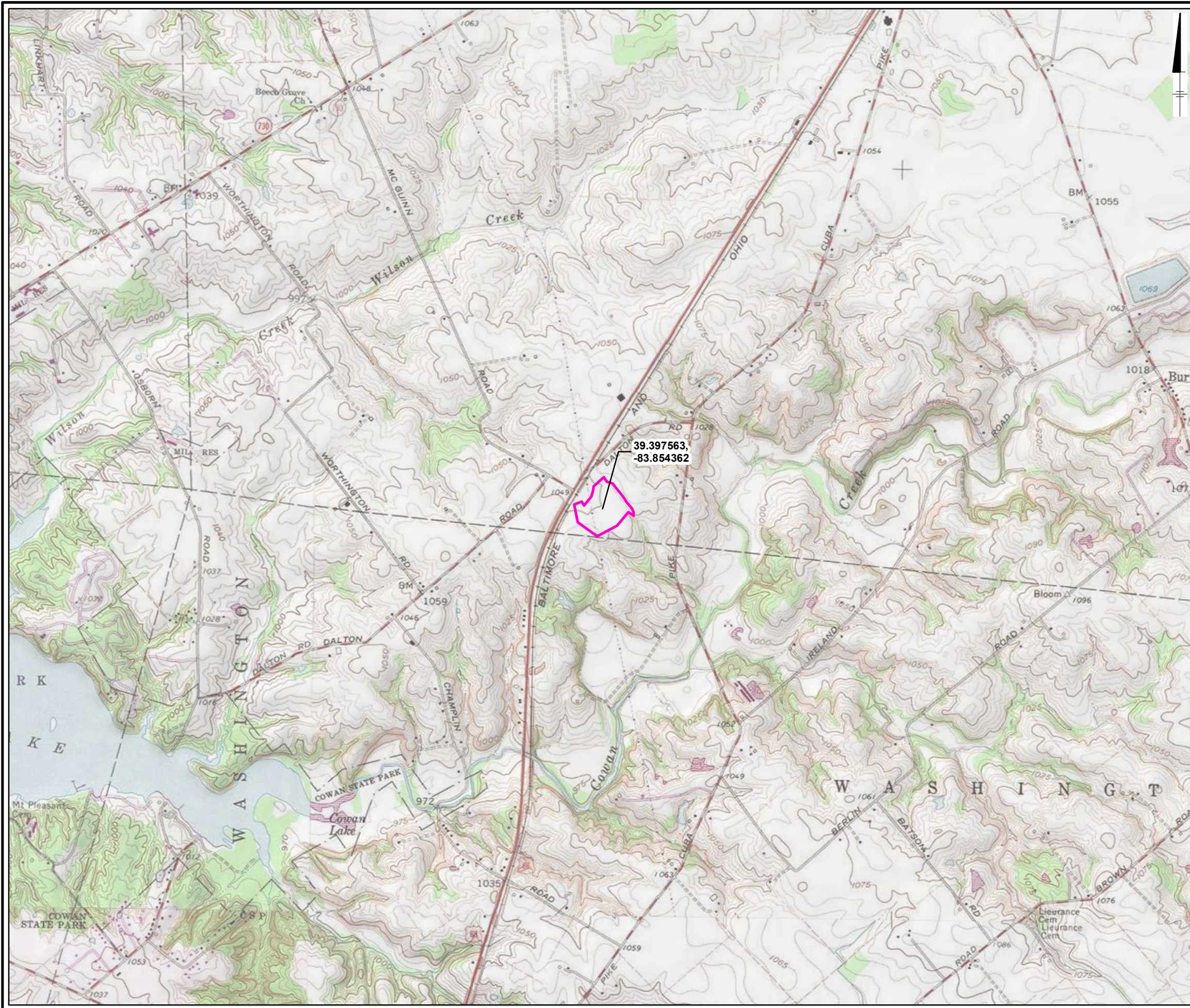
Enclosures:

Attachments

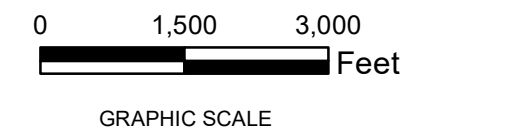
- 1 Site Location Map
- 2 Delineated Streams and Wetlands Map
- 3 Photographic Log
- 4 IPaC Species List
- 5 Project Shapefiles (attached to email)

Attachment 1
Site Location Map

City: CIN Div/Group: EPP Created By: MVazquez Last Saved By: MVazquez
T:\EPP\PL\Clinton_Substation\MXD\WDR\Figure1_Clinton_Topo.mxd 11/4/2020 3:30:37 PM



Legend
Environmental Survey Area (ESA)



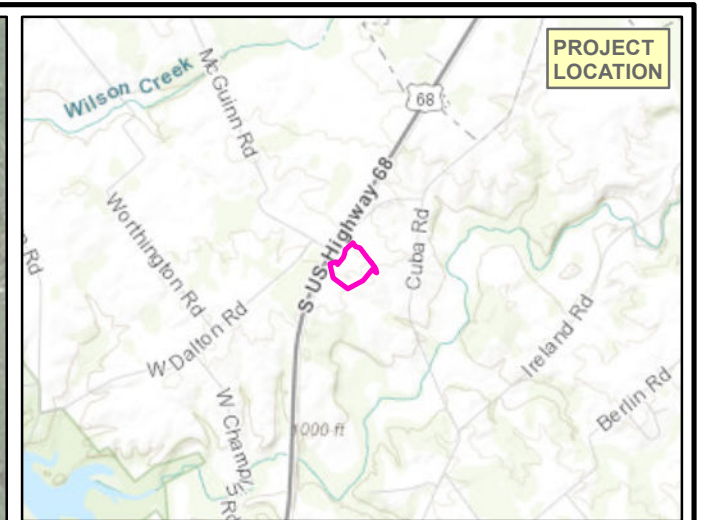
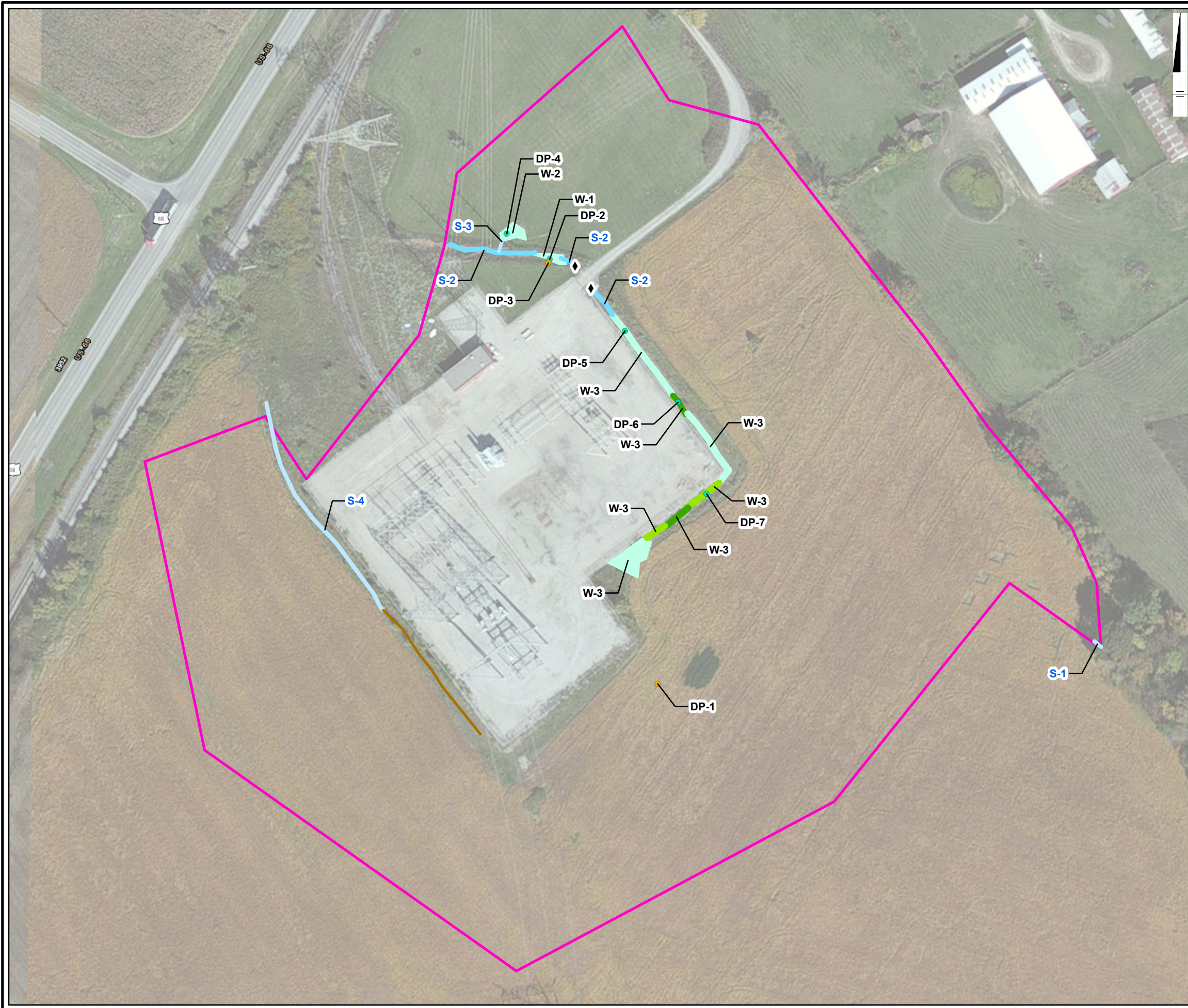
NOTE:
1. USGS TOPOGRAPHIC QUADRANGLE WILMINGTON, OHIO
OBTAINED FROM ESRI IMAGE SERVICE. PHOTO REVISED NOVEMBER, 1979.

AES CORPORATION
CLINTON SUBSTATION PROJECT
CLINTON COUNTY, OHIO

SITE LOCATION MAP

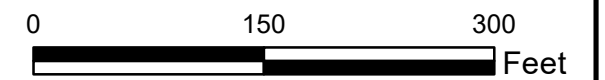
  | 1

Attachment 2
Delineated Streams and Wetlands Map



Legend

- ◆ Culvert
- Upland Data Point
- Wetland Data Point
- Upland Ditch
- Delineated Stream (Ephemeral)
- Delineated Stream (Intermittent)
- Delineated Wetland (PEM)
- Delineated Wetland (PSS)
- Delineated Wetland (PFO)
- Environmental Survey Area (ESA)



GRAPHIC SCALE

NOTE:
1. 2017 IMAGERY OBTAINED FROM ESRI IMAGE SERVICE.

AES CORPORATION
CLINTON SUBSTATION PROJECT
CLINTON COUNTY, OHIO

DELINEATED WETLANDS AND STREAMS MAP



Attachment 3
Photographic Log

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 1

Date:

October 13, 2020

Description:

View of access road to
Clinton Substation

Direction:

Northeast



Photo: 2

Date:

October 13, 2020

Description:

View of Clinton Substation

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 3

Date:

October 13, 2020

Description:

View of Clinton Substation
ESA

Direction:

South



Photo: 4

Date:

October 13, 2020

Description:

View of Clinton Substation

Direction:

South

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 5

Date:

October 13, 2020

Description:

View of Clinton Substation

Direction:

Southwest



Photo: 6

Date:

October 13, 2020

Description:

View of Clinton Substation

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 7

Date:

October 14, 2020

Description:

View of Clinton Substation
ESA

Direction:

Southwest



Photo: 8

Date:

October 13, 2020

Description:

View of stream S-1; facing
upstream

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 9

Date:

October 13, 2020

Description:

View of stream S-1; facing
downstream

Direction:

East



Photo: 10

Date:

October 13, 2020

Description:

View of stream S-1;
substrate

Direction:

N/A

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 11

Date:

October 13, 2020

Description:

View of stream S-2; facing
upstream

Direction:

Northeast



Photo: 12

Date:

October 13, 2020

Description:

View of stream S-2; facing
downstream

Direction:

Southwest

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 13

Date:

October 13, 2020

Description:

View of stream S-2;
substrate

Direction:

N/A



Photo: 14

Date:

October 14, 2020

Description:

View of stream S-3; facing
upstream

Direction:

North

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 15

Date:

October 14, 2020

Description:

View of stream S-3; facing
upstream (outside of ESA)

Direction:

North



Photo: 16

Date:

October 14, 2020

Description:

View of stream S-3; facing
downstream

Direction:

South

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 17

Date:

October 14, 2020

Description:

View of stream S-3; culvert inflow outside of ESA

Direction:

North



Photo: 18

Date:

October 14, 2020

Description:

View of stream S-3;
substrate

Direction:

N/A

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 19

Date:

October 14, 2020

Description:

View of stream S-4; facing
upstream

Direction:

Southeast



Photo: 20

Date:

October 14, 2020

Description:

View of stream S-4; facing
downstream

Direction:

Northwest

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 21

Date:

October 14, 2020

Description:

View of stream S-4;
substrate

Direction:

N/A



Photo: 22

Date:

October 14, 2020

Description:

View of stream S-4; culvert
outlet outside of ESA

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 23

Date:

October 14, 2020

Description:

View of Clinton Substation

Direction:

Northwest



Photo: 24

Date:

October 14, 2020

Description:

View of Clinton Substation

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 25

Date:

October 14, 2020

Description:

View of upland ditch

Direction:

Northwest



Photo: 26

Date:

October 14, 2020

Description:

View of upland ditch

Direction:

Northwest

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 27

Date:

October 14, 2020

Description:

View of upland ditch

Direction:

Southeast



Photo: 28

Date:

October 14, 2020

Description:

View of wetland W-1

Direction:

North

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 29

Date:

October 14, 2020

Description:

View of wetland W-1

Direction:

East



Photo: 30

Date:

October 14, 2020

Description:

View of wetland W-1

Direction:

South

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 31

Date:

October 14, 2020

Description:

View of wetland W-1

Direction:

West



Photo: 32

Date:

October 14, 2020

Description:

View of upland area; data
point DP-1

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 33

Date:

October 14, 2020

Description:

View of wetland W-2

Direction:

North



Photo: 34

Date:

October 14, 2020

Description:

View of wetland W-2

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 35

Date:

October 14, 2020

Description:

View of wetland W-2

Direction:

South



Photo: 36

Date:

October 14, 2020

Description:

View of wetland W-2

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 37

Date:

October 14, 2020

Description:

View of wetland W-3; PEM
portion

Direction:

North



Photo: 38

Date:

October 14, 2020

Description:

View of wetland W-3; PEM
portion

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 39

Date:

October 14, 2020

Description:

View of wetland W-3; PEM
portion

Direction:

South



Photo: 40

Date:

October 14, 2020

Description:

View of wetland W-3; PEM
portion

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 41

Date:

October 14, 2020

Description:

View of wetland W-3; PSS
portion

Direction:

North



Photo: 42

Date:

October 14, 2020

Description:

View of wetland W-3; PSS
portion

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 43

Date:

October 14, 2020

Description:

View of wetland W-3; PSS
portion

Direction:

South



Photo: 44

Date:

October 14, 2020

Description:

View of wetland W-3; PSS
portion

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 45

Date:

October 14, 2020

Description:

View of wetland W-3; PFO
portion

Direction:

North



Photo: 46

Date:

October 14, 2020

Description:

View of wetland W-3; PFO
portion

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 47

Date:

October 14, 2020

Description:

View of wetland W-3; PFO
portion

Direction:

South



Photo: 48

Date:

October 14, 2020

Description:

View of wetland W-3; PFO
portion

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 49

Date:

October 14, 2020

Description:

View of wetland W-3

Direction:

North



Photo: 50

Date:

October 14, 2020

Description:

View of wetland W-3

Direction:

East

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 51

Date:

October 14, 2020

Description:

View of wetland W-3

Direction:

South



Photo: 52

Date:

October 14, 2020

Description:

View of wetland W-3

Direction:

West

Project Photographs

Dayton Power and Light Company, AES Corporation
Clinton Substation Expansion Project
Clinton County, Ohio



Photo: 53

Date:

October 14, 2020

Description:

View of wetland W-3

Direction:

West



Photo: 54

Date:

October 14, 2020

Description:

View of wetland W-3

Direction:

Northwest

Project Summary

Consultation Code: 03E15000-2021-SLI-0209

Event Code: 03E15000-2021-E-00284

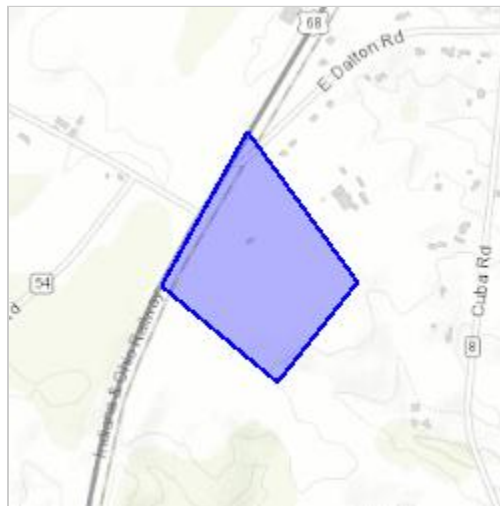
Project Name: Clinton Substation

Project Type: TRANSMISSION LINE

Project Description: Project involves the expansion of the existing Clinton Substation for installation of a new transformer, breakers, and associated hardware.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/39.39778398650299N83.85475055739212W>



Counties: Clinton, OH

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/9/2021 4:51:51 PM

in

Case No(s). 21-0679-EL-BLN

Summary: Notice of Construction of Clinton 345kV Expansion Part 1 electronically filed by Mr. Michael F Russ on behalf of The Dayton Power and Light Company