

COLUMBUS I CLEVELAND CINCINNATI-DAYTON MARIETTA

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Sally W. Bloomfield 614.227.2368 sbloomfield@bricker.com May 5, 2016

Via Electronic Filing

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

Re: Clean Energy Future-Lordstown, LLC, OPSB Case No. 14-2322-EL-BGN

Dear Ms. McNeal:

The September 17, 2015, Opinion, Order, and Certificate ("Certificate") approving Clean Energy Future-Lordstown, LLC ("CEFL") Certificate of Environmental Compatibility and Public Need to Construct the Lordstown Energy Center established a set of conditions as part of the Certificate.

Within this set of conditions, Condition No. 31 requires that:

The Applicant shall have a vegetation management plan that addresses the concerns outlined in the Staff Report. Prior to commencement of construction, the Applicant shall submit this plan to Staff, for review and confirmation that it complies with this condition.

Attached is a copy of the vegetation management plan for the transmission line and switchyard, which was provided to the OPSB Staff on April 25, 2016. Thus, this letter is to inform the OPSB Staff that CEFL is in compliance with **Condition No. 31** for the transmission line and switchyard.

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

Sincerely,

Sally N Bloomfuld

Sally W. Bloomfield

Attachment

cc: Jon Whitis (w/Attachment) Grant Zeto (w/Attachment)

CLEAN ENERGY FUTURE LORDSTOWN

Case No. 14-2322-EL-BGN

Vegetation Management Plan for Electric Transmission Line Right-of-Way Maintenance

I. <u>General</u>

This Vegetation Management Plan (the "Plan") was developed to implement Clean Energy Future – Lordstown's ("CEF-L") ongoing maintenance of its transmission line right-of-way. This proposed work will be limited to the cutting of trees and disposing of all of the debris generated in maintaining the transmission line right-of-way, more fully described in throughout the Plan. All of the initial tree clearing work in the transmission line right-of-way was completed by March 31, 2016. During this initial clearing, no herbicides were used. The Plan will take effect after the construction of the transmission line is completed.

II. <u>Location</u>

The project approved by the Ohio Power Siting Board ("OPSB") in Case No. 14-2322-EL-BGN includes a five-breaker ring bus and an electric transmission line to connect the generation facility to the ring bus. The locations of these facilities are presented in the Certificate application in Case No. 14-2322-EL-BGN and as amended in Case No. 16-01310EL-BGA.

III. <u>Vegetation Removal Process</u>

The contractor will cut all trees, brush, saplings, and vegetation within the locations described in Section II, above. All activities will be performed with conventional vegetation management 1 industry tools and equipment. Trees will be cut down, cut into smaller pieces, and then removed from the work area. Further, vegetation stumps will be cut and left at a height above the terrain as not to disturb the soil and or ground surface. Because the ROW is 100 feet or less, all incompatible vegetation will be controlled from edge to edge

IV. <u>Herbicide Use</u>

The project, or its contractors, may use herbicides to maintain the right-of-way. U.S. Environmental Protection Agency ("EPA")-approved herbicides for use on utility ROW provide the most effective means of controlling unwanted trees, shrubs and other incompatible plants. The EPA approves such products for use only after determining that they will not adversely affect people, animals or the environment when properly applied. Herbicide application is the preferred method to control immature trees or brush. Herbicide control options are determined by terrain, brush height, and density and are designed to control only incompatible vegetation. Any herbicide used by the project will be registered and approved for utility brush control purposes by the U.S. EPA.

All herbicides used on ROW will be applied by state-certified applicators or under the supervision of a certified applicator. A low-volume, low-pressure application method will be employed if herbicides are used, and application will be made to the individual stems of the

targeted plants. Herbicide use will not occur within 50 feet of any surface waters, including nonmitigated streams

V. <u>Debris Disposal</u>

To the extent necessary, large organic debris will either be 1) chipped, shredded, and dispersed over the proposed clearing areas; or 2) will be completely removed from the proposed clearing areas.

VI. <u>Property Owner Notification</u>

The property subject to this vegetation management plan is entirely owned by the project. As a result, no notification of property owners is necessary in order to conduct transmission line right-of-way activities.

VII. <u>Contractor</u>

The right-of-way maintenance activities described herein will be completed by retained contractor. The contractor will adhere to this plan and industry best practices.

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Case No(s). 14-2322-EL-BGN

Summary: Correspondence of Clean Energy Future-Lordstown, LLC in Compliance with Condition No. 31 electronically filed by Teresa Orahood on behalf of Sally Bloomfield