

**LETTER OF NOTIFICATION  
FOR THE  
GREENDALE SUBSTATION EXPANSION PROJECT**

**Duke Energy Ohio, Inc.  
OPSB Case No. 21-229-EL-BLN**

**Submitted to:  
The Ohio Power Siting Board  
Pursuant to OAC 4906-06-05**

**Submitted by:  
Duke Energy Ohio, Inc.**

**April 2021**



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ATTACHMENT C – NATURAL RESOURCES ASSESSMENT

## 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 Greendale Substation Expansion (Project). The following sections correspond to the administrative code sections for the requirements of a Letter of Notification.

### **4906-6-5(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.**

#### **Name of Project:**

Duke Energy Greendale Substation Expansion (Project)

Reference Numbers:

<u>OPSB Filing Number:</u>	The Project has been assigned Ohio Power Siting Board (OPSB) Case Number 21-229-EL-BLN.
<u>PJM Number:</u>	This Project has no transmission elements changing ratings or impedance, so this does not qualify as a PJM supplemental project. There is no ‘PJM Number’.
<u>2020 LTFR:</u>	Due to an unintentional oversight, this project was not included in the 2020 LTFR.
<u>Circuit Reference:</u>	This is not assigned as a transmission circuit within Duke Energy Ohio as this work is associated with the expansion of a substation asset without any associated transmission line scope. No circuit number or name is available.

#### **Brief Description of the Project:**

The proposed Project is located in Cincinnati, Hamilton County, Ohio, at the existing Greendale Termination Substation (Greendale Substation) site. Duke Energy Ohio proposes to expand the existing 138-kV Greendale Substation by approximately 300 square feet (approximately 21 percent) to install approximately 50 feet of new fencing around a secondary oil containment berm. The substation expansion will expand the existing 138-kV Greendale Substation to improve onsite oil containment from potential Underground Transmission Systems and add flood protection within Duke Energy Ohio’s Greendale Substation.

The Greendale Substation Expansion Project is part of a mitigation plan to lower the overall risk of Underground Transmission Systems (aka Pipe Type Cable; – Risk ID 588). The design for this Project will allow for full containment of oil in the transmission line (18,475 gallons) plus added flood protection at

this substation to mitigate up to 4.5 inches of rainfall. The work requires the expansion of the Greendale Substation site/fence approximately 12 feet north of the existing northern fence line on existing Duke Energy Ohio property. Approximately 150 feet of a 4-foot tall Strongwell brand wall containment system will be installed within the extended fence to contain the entire volume of oil in the circuit (~20,000 gallons). Approximately 60 feet of 6-inch perforated pipe, for a French drain, will be installed inside the western and northern sides of the oil containment area. This scope will be completed within the existing Duke Energy Ohio Greendale Substation property.

The Project meets the requirements for a LON as defined by item 1(d) (ii) and 3 of OAC Section 4906-1-01 Appendix A of the Application Requirement Matrix for Electric Power Transmission Lines:

*(4) Constructing additions to existing electric power transmission stations or converting distribution station to transmission stations where:*

*(b) There is a greater than twenty percent expansion of the fenced area.*

#### **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.**

This project is part of a mitigation plan to lower the overall risk of Duke Energy Ohio's underground transmission systems. The substation expansion Project will provide secondary containment for oil contained within the substation fenced area and drainage improvements to mitigate flooding potential. The expanded substation 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 – Figures. Figure 1 depicts the general Project vicinity on a USGS quadrangle topographic map. Figure 2 depicts the planned substation expansion in relation to the existing substation fence and property boundary.

#### **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 existing Greendale Substation fence is not adequate in size to install the oil containment system necessary to reduce risk from the underground transmission system. The proposed Project will occur entirely within Duke Energy property. No long-term impacts to adjacent properties are anticipated as a result of the Greendale Substation Expansion. Therefore, the current proposed expanded substation fence is the only reasonable solution available and no alternatives were considered.

**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/electric-transmission-projects>. Duke Energy Ohio will provide written notice to adjacent property owners prior to beginning construction activity.

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

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

Construction is scheduled to begin in June 2021 pending approval of this Letter of Notification. The Project is anticipated to be completed by August 15, 2021.

**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 – Figures depicts the general location of the Project. Figure 1 depicts the general Project vicinity on a USGS quadrangle topographic map. Figure 2 depicts the planned substation expansion in relation to the existing substation fence and property boundary.

**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 is located north of the existing Greendale Substation, which is located on Duke Energy Ohio property. No easements, options, or land use agreements are necessary to construct and 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, estimated number and types of structures required, and right-of-way and/or land requirements.**

This Project consists of a physical expansion of the existing Greendale Substation for the purpose of adding oil containment features. No changes to the electrical equipment are proposed.

Voltage: Not Applicable

Structure Type: Not Applicable

Conductors:	Not Applicable
Insulators:	Not Applicable
ROW:	The project scope will be completed on Duke Energy Ohio property. No new easement or property is necessary to complete this project.

**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.**

The Project involves expansion of a substation fence with no new electrical equipment proposed. This section is not applicable.

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

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

The estimated capital cost of the Project is \$431,579; this estimate includes the grading, containment wall, stormwater infrastructure, and new perimeter fencing.

**4906-6-05(B)(10) Social and Economic 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 the City of Cincinnati, Hamilton County, Ohio. The existing Greendale Substation is located in an urban area surrounded by residential and commercial land uses. The proposed substation expansion will occur entirely within the 0.07-acre property owned by Duke Energy Ohio. No changes in land use are proposed.

**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 expansion area of the Greendale Substation is immediately adjacent to the north of the existing substation fence on Duke Energy Ohio-owned property. None of this area has been used for agricultural purposes. No Agricultural District Land parcels were identified at or adjacent to the substation property. 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 review of the Ohio Historic Preservation Office (OHPO) Online Mapping System was completed on February 9, 2021. A map showing the results of the review is provided in Attachment B – Cultural Resources Desktop Review. No known archaeological resources were identified. While multiple historic resources were identified within 0.5 mile of the Project, including National Register of Historic Places (NRHP) building and historic districts, none of these resources are immediately adjacent. The Project involves expansion of the existing substation fence to accommodate oil containment infrastructure. Stormwater infrastructure will also be installed on the substation property. No increase to the station height is proposed. Therefore, impacts to these historic aboveground resources are not anticipated. Furthermore, as documented in the natural resource assessment report (Attachment C – Natural Resources Assessment), the Project site has been previously disturbed limiting the potential for archaeological resources. The Project does not appear to warrant additional cultural resources surveys based on the proposed scope of work and nature of the property.

**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 a development affecting less than 0.1 acre of land, no federal or state agencies are anticipated to have jurisdiction over the Project. Duke Energy Ohio has been granted exemptions from City of Cincinnati building and zoning permits. No local permits are expected to be necessary.

**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.**

The United States Fish and Wildlife Service (USFWS) Ohio County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species (available at <https://www.fws.gov/midwest/Endangered/lists/ohio-cty.html>) was reviewed to identify the threatened and endangered species known to occur in Hamilton County. This USFWS publication lists the Indiana bat (*Myotis sodalis*; federally endangered), northern long-eared bat (*Myotis septentrionalis*; federally threatened), running buffalo clover (*Trifolium stoloniferum*; federally endangered), and several endangered mussel species. Coordination with the USFWS and Ohio Department of Natural Resources (ODNR) was initiated on February 12, 2021, in an effort to identify the Project's potential effect on any federally listed threatened or endangered species or critical habitat. A response from USFWS was received reiterating the bat species of concern on March 2, 2021. A response from ODNR has not been received to date. However, no potential bat habitat trees are proposed for clearing as a result of the Project. Conditions

supporting running buffalo clover are not present. No streams were identified on site. The correspondence letters sent to these agencies are included in Attachment C – Natural Resource Assessment.

#### **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, V3 Companies conducted an investigation for areas of ecological concern on the Greendale Substation property. No wetlands, streams, or other areas of ecological concern were identified. V3 Companies' field investigation can be found in Attachment C – Natural Resource Assessment. 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. The Public Areas Database of the United States (PADUS) was also reviewed to locate potentially ecologically sensitive properties in the Project vicinity. Three local parks, the Mill Creek Conservancy, a state recreation area, and Rawson Woods, a state conservation area, were identified between 0.5 mile and 1.0 mile of the substation property. Based on the field investigation and review of publicly available data, impacts to areas of ecological concern are not anticipated.

#### **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.

#### **4906-6-07 SERVICE AND PUBLIC DISTRIBUTION OF ACCELERATED CERTIFICATE APPLICATIONS**

**Serve a copy of the application on the chief executive officer of each municipal corporation, county, township, and the head of each public agency charged with the duty of protecting the environment or of planning land use in the area in which any portion of such facility is to be located. Hard copies shall be made available upon request.**

**Place a copy of the application or place a notice of the availability of such application in the main public library of each political subdivision as referenced in division (B) of section 4906.06 of the Revised Code. If a notice is provided, that notice shall state that an electronic or paper copy of the application is available from the applicant (with instructions as to how to obtain an electronic or paper copy), available for inspection at the applicant's main office, available for inspection at the board's main office, and available at any other sites at which the applicant will maintain a copy of the application.**

**Maintain on its website information as to how to request an electronic or paper copy of the application. Upon request for a paper copy of the application, the applicant shall supply the copy within five business days and at no more than cost.**

**Proof of compliance with this rule shall be filed with the board within seven days of filing the accelerated application.**

Copies of the Letter of Notification have been sent to the appropriate public officials for Hamilton County and the City of Cincinnati, as well as to the Cincinnati and Hamilton County Public Library.

Duke Energy Ohio will maintain a copy of this Application on its website at: [duke-energy.com/Greendale](http://duke-energy.com/Greendale).

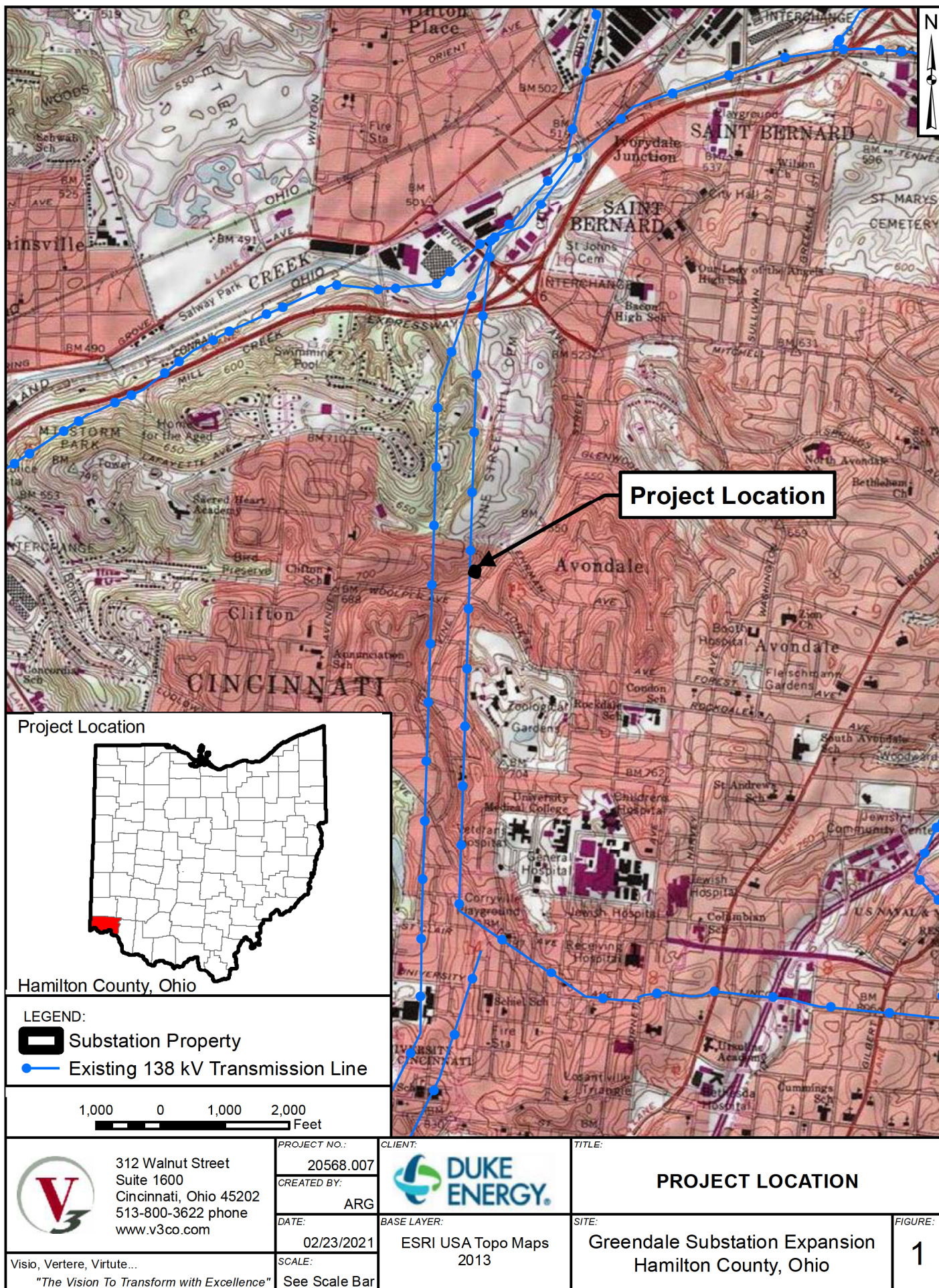
Duke Energy Ohio will file proof of compliance on the docket within 7 days of filing this application.

#### **4906-6-08 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.

## **ATTACHMENT A – FIGURES**







LEGEND:

- Substation Property
- Existing Substation Fence
- Proposed Substation Fence Expansion Area
- Proposed Substation Drainage Installation

25      0      25      50  
 Feet

 <p>312 Walnut Street          Suite 1600          Cincinnati, Ohio 45202          513-800-3622 phone          www.v3co.com</p> <p>Visio, Vertere, Virtute...          "The Vision To Transform with Excellence"</p>	PROJECT NO.: 20568.007	 <p>CLIENT:</p>	TITLE: <p style="text-align: center;"><b>PROJECT LAYOUT</b></p>	
	CREATED BY: ARG			
	DATE: 02/23/2021	BASE LAYER: OSIP 2014	SITE: Greendale Substation Expansion Hamilton County, Ohio	FIGURE: <p style="text-align: center; font-size: 2em;">2</p>

## ATTACHMENT B – CULTURAL RESOURCES DESKTOP REVIEW



State Historic  
Preservation Office

### Legend

#### NR Listings

- Listed
- National Historic Landmark
- Delisted

#### Determinations of Eligibility

- DOE
- Demolished

#### Historic Structures

#### OGS Cemeteries

- Confident
- Not Confident

#### Historic Markers

#### NR Boundaries

#### Historic Previously Surveyed

0 0.19 0.38 Miles

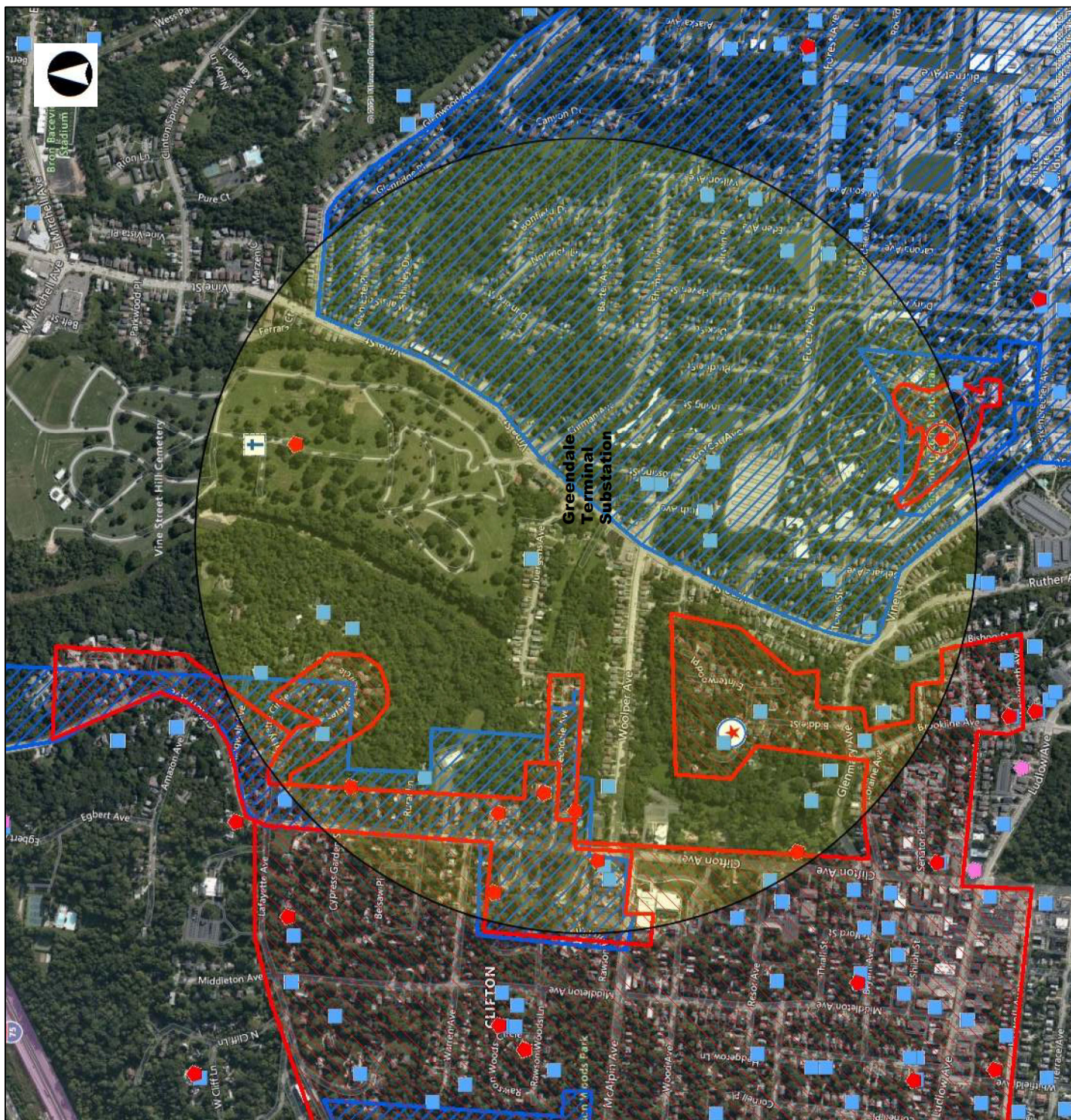
1: 15,000

### Copyright/Disclaimer

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



## ATTACHMENT C – NATURAL RESOURCES ASSESSMENT



3 March 2021

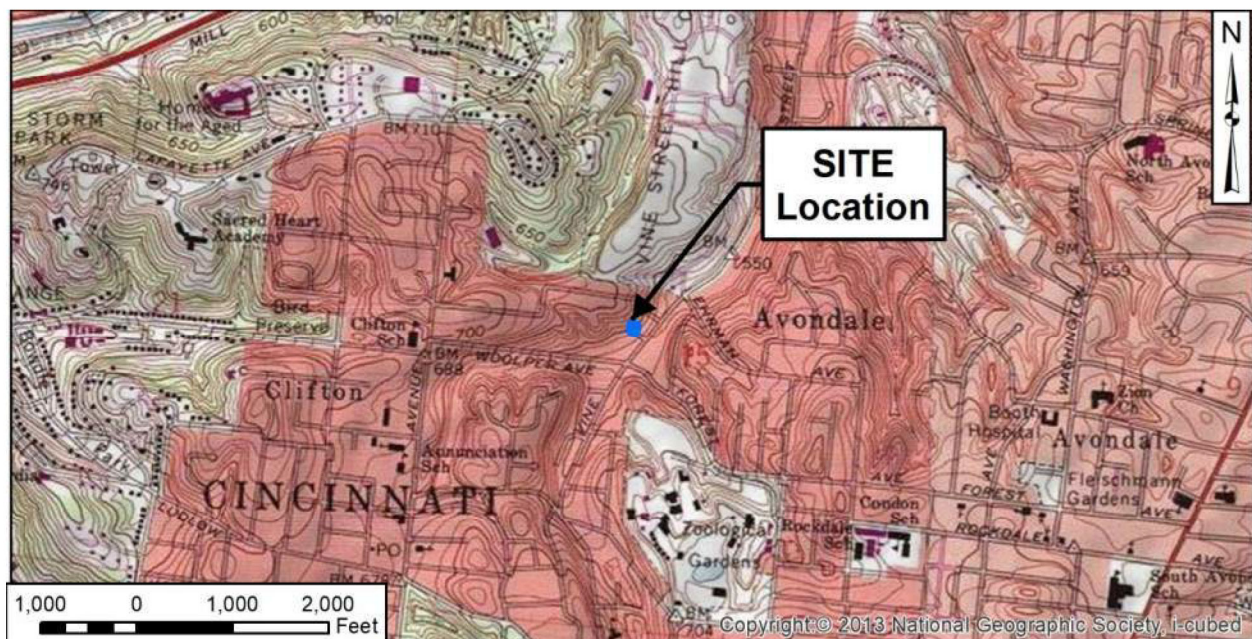
Mr. Dane Vandewater  
Duke Energy  
315 Main Street  
Mail Code EX 0446-06  
Cincinnati, Ohio 45202-4161

**RE: Greendale Substation Expansion Project | Natural Resource Assessment Letter Greendale Avenue, Cincinnati, Hamilton County, Ohio**

Dear Mr. Vandewater,

The purpose of this report is to describe the findings of an assessment of the existing Greendale Substation property located northwest of the intersection of Greendale Avenue and Vine Street, Cincinnati, Hamilton County, Ohio (SITE) for evidence of wetlands and/or other jurisdictional “Waters of the U.S.” The SITE is situated in the Cincinnati West, Ohio USGS 7.5 Minute Quadrangle Map (**Figure 1**). The existing substation is proposed for expansion to the north of the existing footprint.

**Figure 1: USGS Topographic Map Cincinnati West Quadrangle**



The scope of work included determination of the presence of wetlands and/or other jurisdictional “Waters of the U.S.” within the SITE area, using the U.S. Army Corps of Engineers (USACE) methodology described in the *Corps of Engineers Wetland Delineation Manual, 1987* (1987 Manual) and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (2012 Supplement). The purpose of the desktop review and SITE investigation was to identify areas that may qualify as wetlands or “Waters of the U.S.” by the USACE.

## Desktop Review

### National Wetland Inventory

V3 reviewed the applicable National Wetland Inventory (NWI) map to determine the presence or absence or potential wetland areas at the SITE. No NWI features appear on-SITE.

### Natural Resource Conservation Service Soil Survey

V3 reviewed the Natural Resources Conservation Service (NRCS) Web Soil Survey data of Hamilton County, Ohio in order to identify distinct soil unit boundaries in the SITE. Review of the map indicates that the SITE is situated within two soil units. Neither of these soils were identified as hydric.

Table 1: Soils Units On-SITE

Soil Map Unit	Description	Hydric within Hamilton County
UABXF	Urban land-Alfic Udarents-Bonnell complex, 25 to 60 percent slopes	No
UwAXC	Urban land-Alfic Udarents complex, loamy substratum over outwash, 0 to 12 percent slopes	No

### Flood Insurance Rate Map

V3 also reviewed Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) data for the local area of the SITE. The FIRM indicates that the SITE is not located within a regulated floodway and flood zone.

### Endangered, Threatened, and Rare Species Evaluation

The United States Fish and Wildlife Service (USFWS) *Ohio County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species* (available at <https://www.fws.gov/midwest/Endangered/lists/ohio-cty.html>) was reviewed to identify the threatened and endangered species known to occur in Hamilton County, Ohio. This USFWS publication lists the Indiana bat (*Myotis sodalist*; federally endangered), northern long-eared bat (*Myotis septentrionalis*; federally threatened), running buffalo clover (*Trifolium stoloniferum*; federally endangered), and several endangered mussel species. Coordination with the USFWS and Ohio Department of Natural Resources (ODNR) was initiated in an effort to identify the Project's potential effect on any federally or state listed threatened or endangered species or critical habitat. A response from USFWS was received reiterating the bat species of concern on 2 March 2021 (**Attachment A**). A response from ODNR has not been received to date. However, no potential bat habitat trees are located within the SITE Boundary. No conditions are present that could support running buffalo clover. No streams were observed on-SITE, therefore no mussel species would be present.

### Current Site Description

The majority of the SITE consisted of fill from past land disturbance and gravel for the substation pad and access drive. Remaining areas surrounding the substation fence are predominantly grass-covered with limited honeysuckle and other scrub at the SITE boundaries. Adjacent land use is business complexes and residential homes.

Wetlands, Streams, Drainage Features, and Other Potential “Waters of the U.S.”

No wetlands, streams, or drainage features were identified on-SITE. Figure 2 depicts the Delineation Area Map and photo locations.

Figure 2: Delineation Area Map



**SITE Photos**

During the field reconnaissance of the SITE completed on 10 February 2021, V3 took digital photographs to document existing conditions and areas of interest.



**Photo 1: Looking Northeast from access drive**



**Photo 2: Station Expansion Area, Looking East**



**Photo 3: Northern property line with honeysuckle**



**Photo 4: Existing substation, Looking SE**



**Photo 5: Eastern site boundary, Looking North**



**Photo 6: Southern boundary, Looking East**

### **Conclusions**

Based on the criteria established by the USACE 1987 manual and the 2012 Eastern Mountains and Piedmont Supplement, no wetlands, streams, or other drainage features were identified within the SITE boundary. According to the NRCS Web Soil Survey, the SITE is located within soils identified as urban complexes. They are not considered hydric soils. Disturbed soils were confirmed during the SITE reconnaissance.

V3 appreciates the opportunity to be of service to Duke Energy and looks forward to working together in the future. If you have any questions or comments concerning the preliminary natural resource assessment, please contact us at your earliest convenience.

Best regards,  
V3 Companies. Ltd

A handwritten signature in blue ink, appearing to read 'Aaron Geckle'.

Aaron Geckle  
Senior Project Manager

A handwritten signature in blue ink, appearing to read 'Jeffrey S. Moody'.

Jeffrey S. Moody  
Regulatory Services Group Leader

Attachment A

*ETR Species Correspondence*



## Aaron Geckle

---

**From:** Ohio, FW3 <ohio@fws.gov>  
**Sent:** Tuesday, March 2, 2021 11:02 AM  
**To:** Aaron Geckle  
**Cc:** nathan.reardon@dnr.state.oh.us; Parsons, Kate  
**Subject:** Duke Energy Greendale Substation, Hamilton County, Ohio

**CAUTION:** This email originated from outside of V3. Do not click links or open attachments unless you trust the sender.



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-0922

Dear Mr. Geckle,

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/nleeb/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.

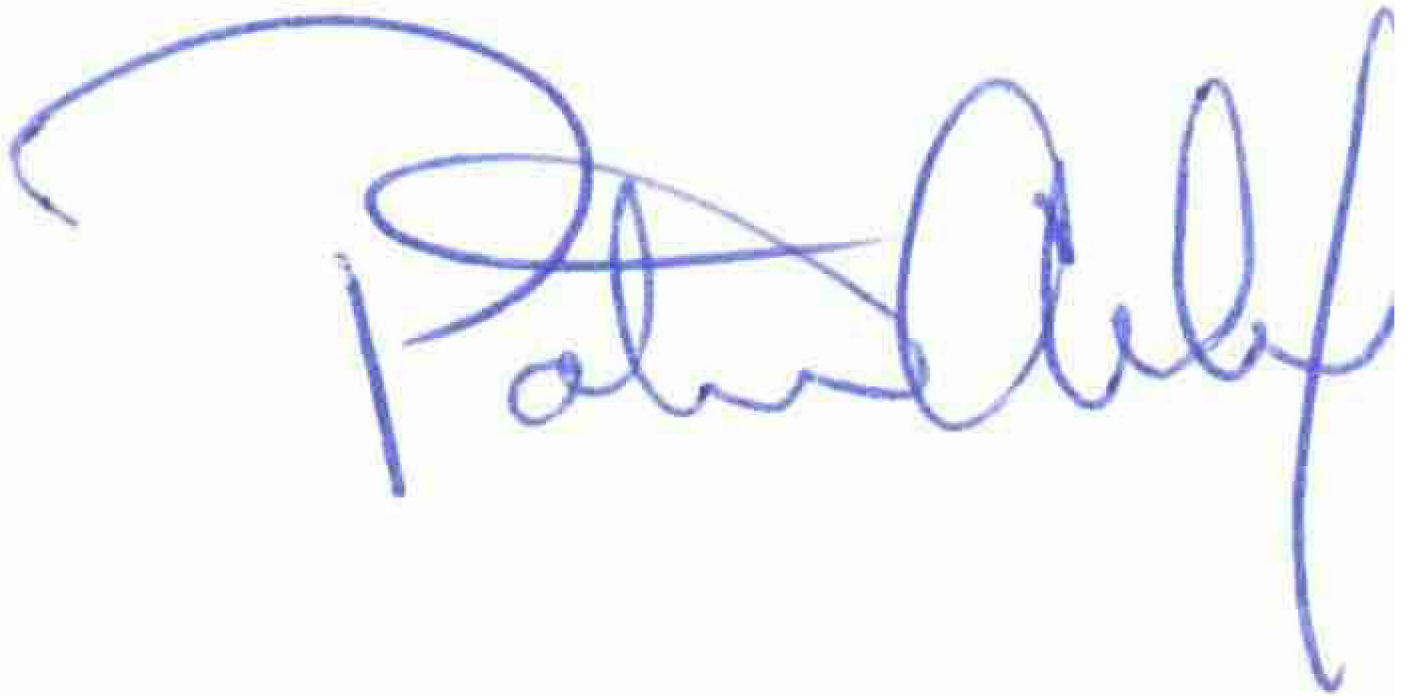
Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio ([https://epa.ohio.gov/portals/47/facts/ohio\\_wetlands.pdf](https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf)). 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". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Patrice Ashfield  
Field Office Supervisor

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

## Aaron Geckle

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**From:** Aaron Geckle  
**Sent:** Wednesday, February 17, 2021 3:35 PM  
**To:** 'environmentalreviewrequest@dnr.state.oh.us'  
**Subject:** Duke Energy Greendale Substation, Hamilton County, Ohio  
**Attachments:** DukeGreendaleMap.pdf; DukeGreendale\_Buffer.zip; DukeGreendale\_Property.kmz

Dear ODNR Staff,

On behalf of Duke Energy, V3 Companies is submitting this Environmental Review Request concerning any rare, threatened, endangered, or candidate species and their critical habitat in the vicinity of the Duke Energy Greendale Substation Expansion Project in Hamilton County, Ohio. A map of the Project location, a GIS shapefile of a 0.5-mile buffer of the Project Site, and a GoogleEarth kmz file of the substation property are attached.

The proposed Project involves the expansion of the existing substation fence by approximately 300 square feet, an approximately 21% increase, in order to improve on-site oil containment from potential underground transmission systems and add flood protection. The Project is subject to Ohio Power Siting Board (OPSB) approval. The expansion of the substation fence will occur entirely within the Duke Energy property. No potential bat habitat trees are located within the property boundary. No streams, wetlands, or other waterbodies have been identified on site.

Please provide a formal response regarding the results of your environmental review of the Project at your earliest convenience. The response will be included in the OPSB Letter of Notification filing.

Please contact me if you have any questions or concerns.

**Aaron Geckle** | Senior Project Manager

**V3 Companies** | 312 Walnut Street, Suite 1600 | Cincinnati, OH 45202  
C 513.800.3622 | E ageckle@v3co.com

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

**Commission of Ohio Docketing Information System on**

**4/7/2021 10:36:42 AM**

**in**

**Case No(s). 21-0229-EL-BLN**

Summary: Application Letter of Notification for the Greendale Substation Expansion Project electronically filed by Carys Cochern on behalf of Duke Energy Ohio, Inc.