

**LETTER OF NOTIFICATION
FOR THE
BECKJORD SUBSTATION EXPANSION AND TRANSMISSION LINE
PROJECT**

**Duke Energy Ohio, Inc.
OPSB Case No. 22-452-EL-BLN**

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

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

June 2022



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Letter of Notification

This Letter of Notification has been prepared by Duke Energy Ohio, Inc. (hereafter “Duke Energy Ohio”) in accordance with Ohio Administrative Code (OAC) Section 4906-6-05 for the review of Accelerated Certificate Applications for the Beckjord 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 Ohio Beckjord Substation Expansion and Transmission Line Project (Project)

Reference Numbers:

<u>OPSB Filing Number:</u>	The Project has been assigned Ohio Power Siting Board (OPSB) Case Number 22-452-EL-BLN.
<u>PJM Number:</u>	PJM will assign a Supplemental project number when PJM completes its do-no-harm analysis.
<u>2022 LTFR:</u>	This Project was not included in the 2021 LTFR; however, it will be included in the 2022 LTFR for the expansion and the two new structures on the 138 kV transmission lines.
<u>Circuit Reference:</u>	This Project relates to Transmission Circuits 5988 and 1881, a 138-kV transmission lines.

Brief Description of the Project:

The Project involves expanding the substation on Duke Energy Ohio property or existing easements, and includes expanding the existing substation perimeter fencing to accommodate new and reconfigured equipment inside the substation for more efficient and reliable operations. The substation expansion will consist of an area approximately 34,600 square feet (sq. ft.) or a 20.4% increase in size. The existing chain link perimeter fence of the substation will be expanded to the southeast, within Duke Energy Ohio's property and easements. Two new above-ground steel monopoles will be installed on 138 kV circuits to raise the transmission line to allow relocation of a 69 kV line, outside of the substation. The 138-kV transmission line will be transferred to the new structures, but no new conductor will be installed.

The Project meets the requirements for a Letter of Notification, as set forth in Appendix A to OAC Rule 4906-1-01:

- (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.

The Beckjord Substation in the Village of New Richmond, Clermont County, Ohio, will undergo expansion and the installation of new equipment to improve the reliability of the local community's electricity. The expansion of the Beckjord Substation will increase security, improve reliability, and increase Duke Energy Ohio's ability to maintain and efficiently operate its substation. The proposed substation expansion will meet regulatory standards to serve electricity to homes, schools, hospitals, and businesses in the area. As part of the overall work at the substation, a 69 kV line will be relocated. To accommodate this relocation, two 138 kV circuits will be raised by installing two new transmission poles.

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 larger Beckjord 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 expansion of the Beckjord Substation is located adjacent to the existing substation. The Project will occur entirely within an area formerly occupied by a coal-fired power generation station, which has been decommissioned and demolished. No additional long-term impacts to adjacent properties are anticipated as a result of the Project. Therefore, the current configuration is the only reasonable alternative available and no other 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 can be found at the following website: www.duke-energy.com/beckjord.

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 September 1, 2022, pending approval of this Letter of Notification. The Project is anticipated to be completed and in service by June 1, 2023.

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.

Beckjord Substation is located on Parcels 272802E012 and 540926.845, which is owned by Duke Energy Ohio Inc. The proposed Project extends onto parcel 540926.004, which is owned by New Richmond Development Corporation LLC. Duke Energy Ohio will acquire the portion of the parcel that is owned by New Richmond Development Corporation LLC.

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

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

Duke Energy Ohio proposes to expand the existing substation by an area of approximately 34,600 sq. ft., which is approximately 20.4% of the existing substation size. The chain link perimeter fence of the substation will be extended 100 feet to the south of the existing fence; all the expansion will be within Duke Energy Ohio's property and easements. The Project also involves the installation of foundations, a 138-kV ring bus, and a new control building that will be located in the expanded substation. Two new 110-foot-tall monopoles will be constructed, with an above-ground height of approximately 95.0 feet and with approximately 15.0 feet buried. The two new above-ground steel monopoles will be installed on 138 kV circuits to raise the transmission lines to provide sufficient clearance for 69 kV circuits that will be relocated. The 138-kV transmission line will be transferred to the new structures, but no new conductor will be installed. The technical features are shown in Figure 2.

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 Beckjord Substation. This is the initial phase of improvements to be made at Beckjord Substation once the expansion has been completed.

Voltage: 138-kV

Structure Type:	Two 110' steel poles that are directly embedded 15.0 feet in the ground.
Conductors:	853 ACAR 30x7
Static Wire:	159 ACSR 12x7 "GUINEA"
Insulators:	138-kV glass insulators
ROW:	No new easements are required for 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 and installation of two new transmission structures along an existing centerline with no residences or institutions within 100 feet. 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 \$9,192,176. This estimate includes grading, installation of the new perimeter fencing, transmission structures, and necessary upgrades.

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 in the Village of New Richmond, Clermont County, Ohio. The existing Beckjord Substation is in an industrial area adjacent to the former Walter C. Beckjord Power Plant. The proposed substation expansion and structures installation will occur entirely within Duke Energy Ohio property, areas to be acquired by Duke Energy Ohio, or existing easements. 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 Beckjord Substation is immediately adjacent to the existing substation fence. 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 indicated no known archaeological resources within the area of proposed ground disturbance. No structures listed on the national Register of Historic Places (NRHP) were identified within 0.5 mile of the Project. The mapped soil unit within the proposed work areas suggest cut and fill or other construction activity. Disturbed soils, gravel, and pavement were confirmed during site reconnaissance. A Project Summary Form and corresponding report were submitted to OHPO requesting concurrence that no historic properties will be affected. OHPO provided concurrence on April 19, 2022. A copy of the concurrence is provided in Attachment B.

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.

No federal or state agencies are anticipated to have jurisdiction over the Project. 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 Clermont 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 4, 2022, to identify the Project's potential effect on any federally listed threatened or endangered species or critical habitat. A response from USFWS was received on February 18, 2022 indicating that no adverse effects to federal Endangered, Threatened and Rare (ETR) species are anticipated. A response from ODNR was provided on March 4, 2022. ODNR identified several mussels, fish, birds, and Kirtland's snake, as well as the bat species listed above. However, no potential bat habitat trees are located within the project boundary. No streams were observed within the project area of

disturbance; therefore, no aquatic species would be present. Habitat for the other species was not observed. No impacts to state-listed species are anticipated. The agency correspondence is 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 Beckjord 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. No such properties were identified within one mile from the Project. 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 Public Utilities Commission of Ohio.

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.

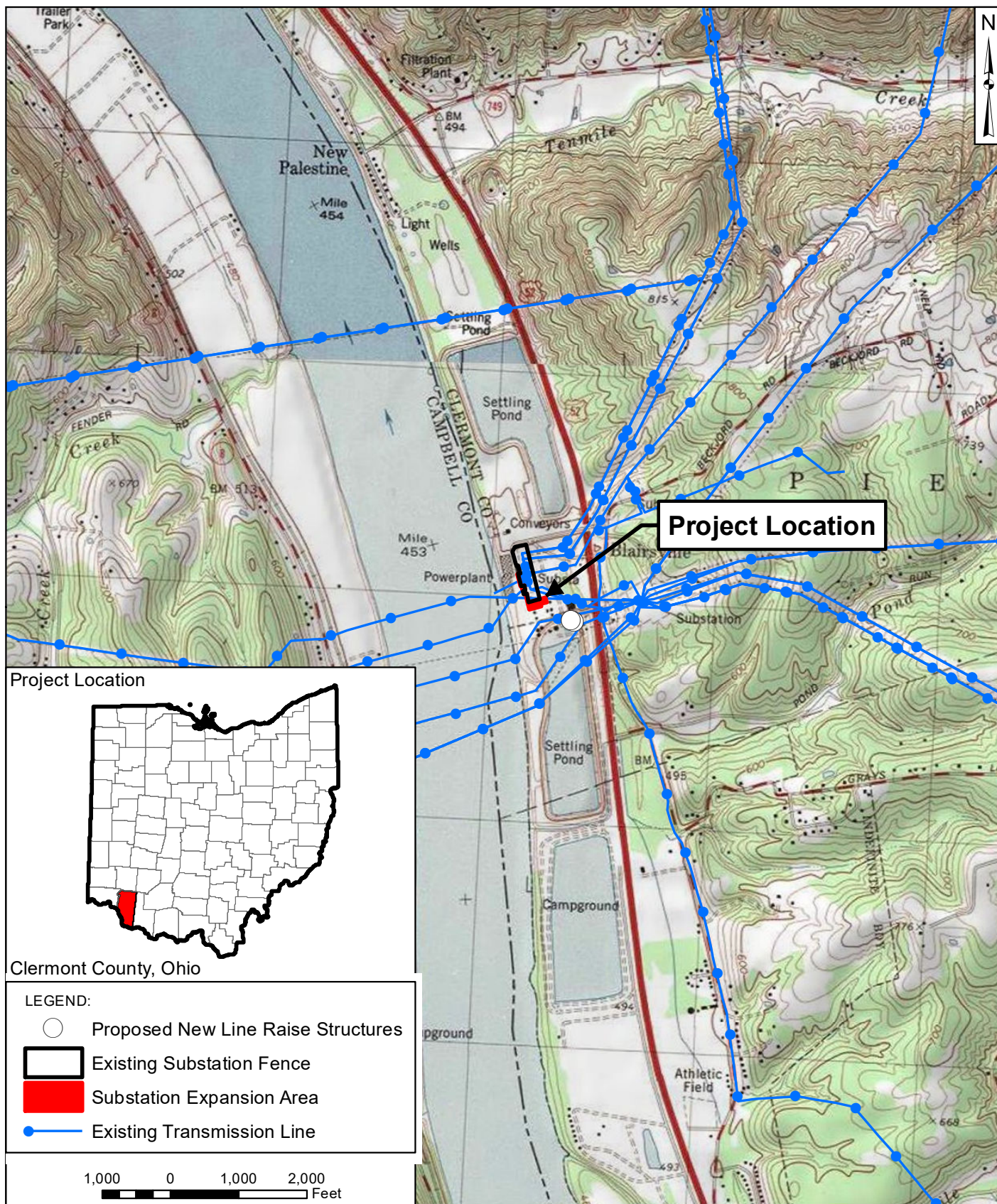
A link to a copy of the Letter of Notification has been sent to the appropriate public officials for Clermont County and the Village of New Richmond. Additionally, a link has been sent to the Clermont County Public Library – New Richmond Branch.



Duke Energy Ohio will maintain a copy of this Application on its website at: www.duke-energy.com/beckjord.

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

Duke Energy Ohio will also publish a notification of this application in the Clermont Sun within 7 days of filing.

ATTACHMENT A – FIGURES





 <div>312 Walnut Street Suite 1600 Cincinnati, Ohio 45202 513-800-3622 phone www.v3co.com</div>	PROJECT NO.: 20568.025		 <div>CLIENT: DUKE ENERGY.</div>	TITLE: PROJECT LOCATION		
	CREATED BY: ARG					
	DATE: 05/10/2022			BASE LAYER: ESRI USA Topo Maps 2013	SITE: Beckjord Substation Expansion and Transmission Line Project Clermont County, Ohio	FIGURE: 1
	SCALE: See Scale Bar					
Visio, Vertere, Virtute... "The Vision To Transform with Excellence"						



LEGEND:

- Existing Substation Fence
- Substation Expansion Area
- Proposed New Line Raise Structure
- Existing Transmission Line
- Proposed 69 kV Line Relocation

75 0 75 150
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>	<p>PROJECT NO.: 20568.025</p>	<p>CLIENT:</p>  <p>BASE LAYER:</p> <p>Clermont County, 2020</p>	<p>TITLE:</p> <p>PROJECT LAYOUT</p>	
	<p>CREATED BY: ARG</p> <p>DATE: 05/10/2022</p> <p>SCALE: See Scale Bar</p>		<p>SITE:</p> <p>Beckjord Substation Expansion and Transmission Line Project Clermont County, Ohio</p>	<p>FIGURE:</p> <p>2</p>

ATTACHMENT B – CULTURAL RESOURCES CONCURRENCE



In reply refer to
2022-CLE-54582

April 19, 2022

Aaron Geckle
V3 Companies
312 Walnut Street, Suite 1600
Cincinnati, Ohio 45202

Dear Mr. Geckle:

RE: Duke Energy Beckjord Substation Expansion Project, New Richmond, Hamilton County, Ohio

This is in response to the receipt of correspondence, on April 14, 2022, regarding the proposed substation expansion in Hamilton County, Ohio. The comments of the Ohio Historic Preservation Office are submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended.

Based on the information submitted, it is my opinion that the proposed undertaking will have no effect on properties listed in or eligible for listing in the National Register of Historic Places. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

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) 298-2000, or by email at nyoung@ohiohistory.org. Please note the Ohio SHPO now accepts electronic-only submissions for state and/or federal review under Section 106 and ORC 149.53. Please send your submissions to section106@ohiohistory.org. We have also updated our [Survey Report Submission Standards](#).

Sincerely,

A handwritten signature in blue ink that reads "Nathan J. Young".

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • ohiohistory.org

ATTACHMENT C – NATURAL RESOURCES ASSESSMENT



6 May 2022

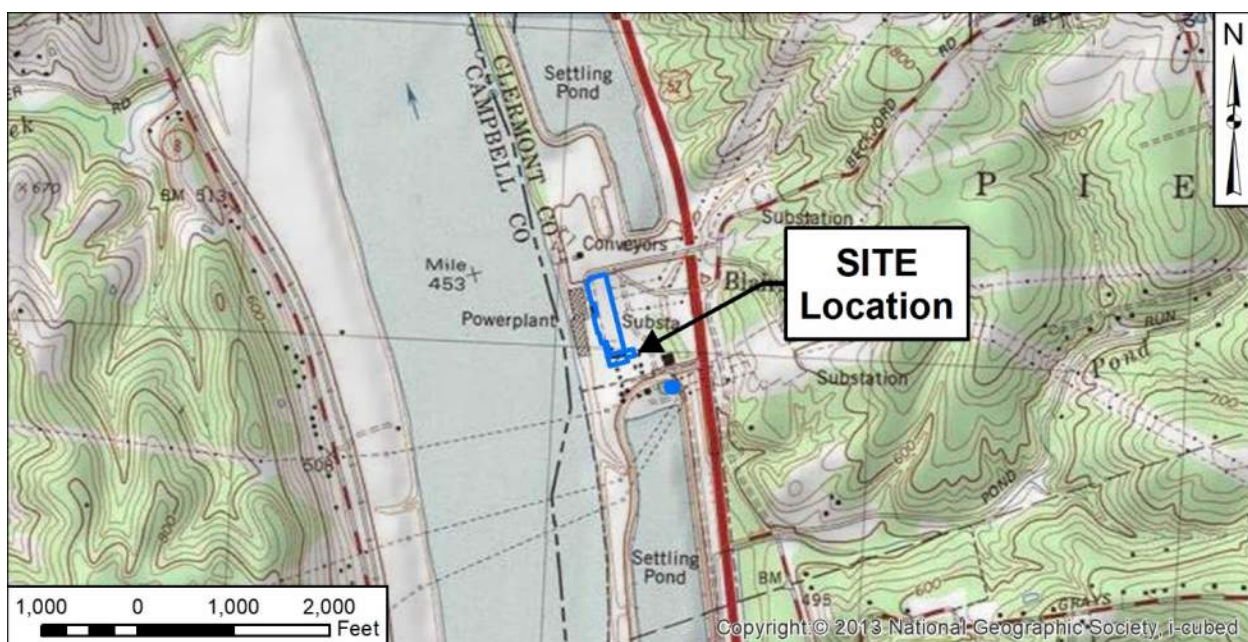
Mr. Dane Vandewater
Duke Energy
315 Main Street
Mail Code EX 0446-06
Cincinnati, Ohio 45202-4161

RE: Beckjord Substation Expansion and Transmission Line Relocation
Natural Resources Assessment Letter Report
Village of New Richmond, Clermont County, Ohio

Dear Mr. Vandewater,

The purpose of this report is to describe the findings of a natural resource assessment of the existing Beckjord Substation property located southwest of the intersection of U.S. 52 and Beckjord Road, Village of New Richmond, Clermont County, Ohio (SITE) for evidence of wetlands and/or other jurisdictional "Waters of the U.S." The SITE is situated in the New Richmond, Kentucky-Ohio USGS 7.5 Minute Quadrangle Map (**Figure 1**). Duke Energy Ohio proposes to expand the substation southward by approximately 0.7 acre across portion of the former Walter C. Beckjord Generating Station. Two new steel poles along an existing 138 kV transmission line are also proposed approximately 650 feet southeast of the substation expansion area in a turfgrass-covered area. This scope will be completed within areas of the former Beckjord Generating station, which has been demolished.

Figure 1: USGS Topographic Map New Richmond 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 Clermont County, Ohio in order to identify distinct soil unit boundaries in the SITE. Review of the map indicates that the SITE is situated within the Cut and fill land soil unit. This soil unit indicates an area of previous ground disturbance which is consistent with the existing substation and surrounding Walter C. Beckjord Generating Station. This soil was not identified as hydric.

Flood Insurance Rate Map

V3 also reviewed Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL) data for the local area of the SITE. The FIRM indicates that the substation expansion portion of the SITE is not located within a regulated floodway or flood zone. The two new pole locations are mapped within Zone AE, a 100-year flood zone with base flood elevations established. However, The Clermont County Special Flood Damage Reduction Regulations, Section 3.9 (C), states that major utility projects subject to Ohio Power Siting Board (OPSB) approval are exempt from these regulations, which matches the state regulations for OPSB jurisdictional projects. No flood permitting is required.

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 Clermont County, Ohio. 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 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 on 18 February 2022 indicating that no adverse effects to federal Endangered, Threatened and Rare (ETR) species are anticipated (**Attachment A**). A response from ODNR was provided on 4 March 2022. ODNR identified several mussel, fish, bird species, and Kirtland’s snake, as well as the bat species listed above. However, no potential bat habitat trees are located within the SITE Boundary. No streams were observed on-SITE, therefore no aquatic species would be present. Habitat for the other species was also not observed. No impacts to ETR species are anticipated. The ODNR response is provided in **Attachment A**.

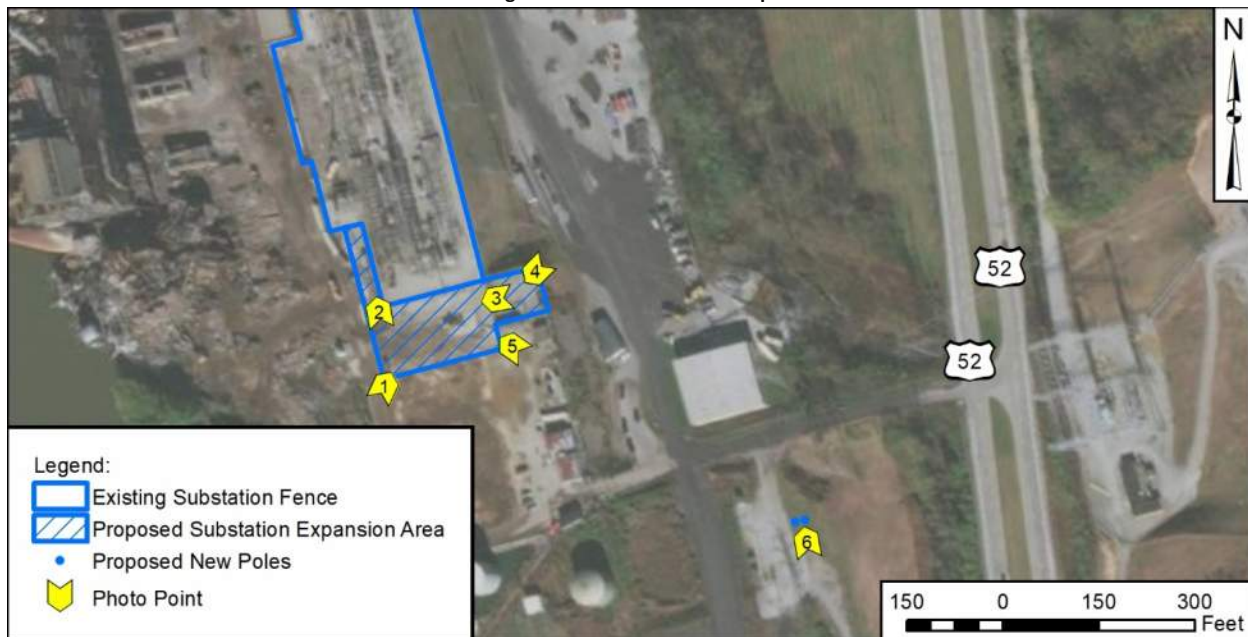
Current Site Description

The substation expansion area of the SITE consisted of fill from past land disturbance, with gravel and paved surfaces. The two new pole locations are along the existing 138 kV centerline and within a small turfgrass-covered area adjacent to a parking lot. Remaining areas surrounding the substation fence are predominantly paved or graveled. Adjacent land use includes other areas of the former Walter C. Beckjord Generating Station.

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 5 April 2022, V3 took digital photographs to document existing conditions and areas of interest.



Photo 1: Looking NE at expansion area



Photo 2: N view of northwestern expansion area



Photo 3: Looking W at expansion area



Photo 4: Proposed expansion area looking SW



Photo 5: Proposed expansion area looking NW

Photo 6: Looking N at are of two new poles

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 situated within the Cut and fill land soil unit. This soil unit indicates an area of previous ground disturbance which is consistent with the existing substation and surrounding Walter C. Beckjord Generating Station. This soil was not identified as hydric. 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 natural resource assessment, please contact us at your earliest convenience.

Best regards,
V3 Companies. Ltd

A handwritten signature in blue ink.

Aaron Geckle
Senior Project Manager

A handwritten signature in blue ink.

Jeffrey S. Moody
Regulatory Services Group Leader

Attachment A

ETR Species Correspondence



Aaron Geckle

From: Ohio, FW3 <ohio@fws.gov>
Sent: Friday, February 18, 2022 9:57 AM
To: Aaron Geckle
Subject: V3, Duke Energy, Ohio Beckjord Substation Expansion, Clermont 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



Project Code: 2022-0004387

Dear Mr. Geckle,

The U.S. Fish and Wildlife Service (Service) 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 effects 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: Due to the project, type, size, and location, we do not anticipate adverse effects to federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, then please contact us for additional project review.

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.

Sincerely,

Patrice Ashfield
Field Office Supervisor



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

March 4, 2022

Aaron Geckle
V3 Companies
312 Walnut Street, Suite 1600
Cincinnati, OH 45202

Re: 22-0110; Duke Energy Beckjord Substation Expansion

Project: The proposed Project involves the expansion of the existing substation fence by approximately 0.7 acres, a less than 20% increase. Two new structures along an existing 138 kV transmission line southeast of the substation will be part of the Project.

Location: The proposed project is located in Blairsville Township, Clermont 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 data at or within one mile of the project area:

Virginia-mallow (*Ripariosida hermaphrodita*), P
Blue Catfish (*Ictalurus furcatus*), SC
Shoal chub (*Macrhybopsis hyostoma*), E
Channel Darter (*Percina copelandi*), T
Wartyback (*Cyclonaias nodulata*), E
Purple Wartyback (*Cyclonaias tuberculata*), SC
Butterfly (*Ellipsaria lineolata*), E
Elephant-ear (*Elliptio crassidens*), E
Black Sandshell (*Ligumia recta*), T
Washboard (*Megalania nervosa*), E
Threehorn Wartyback (*Obliquaria reflexa*), T
Sheepnose (*Plethobasus cyphus*), E, **FE**
Ohio Pigtoe (*Pleurobema cordatum*), E
Round Pigtoe (*Pleurobema sintoxia*), SC
Ebonyshell (*Reginaia ebenus*), E
Monkeyface (*Theliderma metanevra*), E
Deertoe (*Truncilla truncata*), SC

The review was performed on the project area specified in the request as well as an additional one-mile radius. Records searched date from 1980. Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federal endangered, and FT = federal threatened.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for an area is not a statement that rare species or unique features are absent from that area.

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”. 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 the DOW (contact Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Erin Hazelton 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 the 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

rayed bean (*Villosa fabalis*)

sheepnose (*Plethobasus cyphus*)

fanshell (*Cyprogenia stegaria*)

pink mucket (*Lampsilis orbiculata*)
snuffbox (*Epioblasma triquetra*)

State Endangered

butterfly (*Ellipsaria lineolata*)
ebonyshell (*Fusconaia ebena*)
elephant-ear (*Elliptio crassidens crassidens*)
little spectaclecase (*Villosa lienosa*)
monkey face (*Quadrula metanevra*)
Ohio pigtoe (*Pleurobema cordatum*)
wartback (*Quadrula nodulata*)
washboard (*Megalania nervosa*)

State Threatened

fawnsfoot (*Truncilla donaciformis*)
threehorn wartback (*Obliquaria reflexa*)

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

The project is within the range of the following listed fish species.

State Endangered

bigeye shiner (*Notropis boops*)
goldeye (*Hiodon alosoides*)
northern madtom (*Noturus stigmosus*)
shoal chub (*Macrhybopsis hyostoma*)
shortnose gar (*Lepisosteus platostomus*)
shovelnose sturgeon (*Scaphirhynchus platyrhynchus*)

State Threatened

American eel (*Anguilla rostrata*)
blue sucker (*Cycleptus elongatus*)
channel darter (*Percina copelandi*)
mountain madtom (*Noturus eleutherus*)
paddlefish (*Polyodon spathula*)
river darter (*Percina shumardi*)

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

The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. Due to the location, the type of habitat within the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the black-crowned night-heron (*Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and

roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this 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 US Fish & Wildlife Service.

Geological Survey: The Division of Geological Survey has the following comments.

Physiographic Region

The proposed project area is in Pierce Township, Clermont County. This area is in the Outer Bluegrass physiographic region. This region is characterized by a high relief, dissected plateau of Ordovician- and Silurian-age dolomites, limestones, and calcareous shales. Caves and other karst features are relatively common. Thin drift capped ridges are common in the western portion of the region (Ohio Department of Natural Resources, Division of Geological Survey, 1998).

Surficial/Glacial Geology

The project area lies inside the glaciated margin of the state. Glacial deposits within the project area contain alluvium and alluvial terraces consisting of silty clay to coarse sand and gravels. Glacial drift throughout the study area is between 82 to 110 feet thick with the thickest drift occurring in the northern portion of the project area and thinning to the south (Ohio Department of Natural Resources, Division of Geological Survey, Statewide Surficial Geology Map).

Bedrock Geology

The Ordovician-age Point Pleasant Formation underlies the entire project area. This bedrock unit is characterized by gray to bluish gray limestone and shale. It should be noted that bedrock is not exposed at the surface within the boundaries of the project area due to glacial drift (Slucher et al, 2006).

Oil, Gas and Mining

ODNR has no record of oil and gas wells within one mile of the proposed project area. (Ohio Department of Natural Resources, Division of Oil and Gas, Ohio Oil and Gas Wells Locator).

ODNR does not have record of any mining operations within the project area. The nearest mine to the project area is an inactive gravel quarry owned by The Brewer Company. This quarry is located 7.2 miles to the northwest (Ohio Department of Natural Resources, Division of Mineral Resources, Mines of Ohio).

Seismic Activity

Several small earthquakes have historically been recorded in the region. The three events closest to the site are listed in the chart below (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Earthquake Epicenters):

Date	Magnitude	Distance to Site Boundary	County	Township
September, 1859	2.5	9.0 miles	Clermont	Batavia
1864	2.5	9.1 miles	Clermont	Batavia
May 5, 1804	2.9	10.2 miles	Clermont	Stonelick

Karst

Karst features usually form in areas that are covered by thin or no glacial drift and the bedrock is limestone or dolomite. The nearest verified sinkhole is located 2.9 miles to the northeast. Although there are no sinkholes in the project area, the underlying interbedded limestone and shale formations are susceptible to the formation of sinkholes. Substantial glacial deposits within the project area makes sinkhole formation unlikely (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Karst).

Soils

According to the USDA Web Soil Survey, the project area soil consists of heavily modified cut and fill land material.

Groundwater

Groundwater resources are plentiful from the sand and gravel aquifers throughout the project area. Wells developed in bedrock are likely to only yield up to 5 gallons per minute (Walker, 1986 and Ohio Department of Natural Resources, Division of Water, Bedrock Aquifer Map, 2000). Wells developed in alluvial material are likely to yield over 500 gallons per minute, depending on thickness, and coarseness of the deposits. (Ohio Department of Natural Resources, Division of Water, Statewide Unconsolidated Aquifer Map, 2000).

ODNR has record of 12 water wells drilled within one mile of the project area. These wells range in depth from 69 to 100 feet, with an average depth of 88.8 feet. The most common aquifer listed is sand and gravel. Eight of the wells are completed in sand and gravel and four wells are completed in shale and limestone bedrock. Sustainable yields of 1 to 900 gallons per minute have been reported for four wells within one mile of the project area, with the average sustainable yield being 454 gallons per minute (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Water Wells).

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 Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator

**This foregoing document was electronically filed with the Public Utilities
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Case No(s). 22-0452-EL-BLN

Summary: Letter of Notification Letter of Notification For The Beckjord Substation
Expansion and Transmission Line Project electronically filed by Mrs. Tammy M.
Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Vaysman,
Larisa and Kingery, Jeanne W. and Akhbari, Elyse Hanson