

**CONSTRUCTION NOTICE
FOR THE
F7481 WOOD POLE REPLACEMENT
(NORTHERN HAMILTON COUNTY)**

**Duke Energy Ohio, Inc.
OPSB Case No. 22-801-EL-BNR**

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

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

September 2022



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Construction Notice

This Construction Notice 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 F7481 Wood Pole Replacements Project (Project). The following sections correspond to the administrative code sections for the requirements of a Construction Notice.

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 Construction Notice.

Name of Project:

Duke Energy Ohio F7481 Wood Pole Replacements Project (Project)

Reference Numbers:

<u>OPSB Filing Number:</u>	The Project has been assigned Ohio Power Siting Board (OPSB) Case Number 22-801-EL-BNR.
<u>PJM Number:</u>	This Project is not a PJM supplemental project.
<u>2022 LTFR:</u>	This Project was not included in the 2021 or 2022 LTFRs due to the project being maintenance and inspection based.
<u>Circuit Reference:</u>	This Project relates to Transmission Circuit F7481, a 138-kV transmission line.

Brief Description of the Project:

The Project involves replacing four wood pole structures, including one stub pole for guy wires to the main structure, with new steel poles on the F7481 138 kV circuit in the City of Blue Ash, Hamilton County, Ohio. A fifth structure will have transmission attachments removed but remain in place for distribution purposes. The structures will be replaced at two locations. One of the wood pole structures, and its associated stub pole for guy wires, is located at the intersection of Pfeiffer Road/Glendale-Milford Road and Kenwood Road. The remaining two structures, and the structure that will have transmission attachments removed, are located along Malsbury Road approximately 200 feet northwest of Carver Road. The Project is within existing right-of-way and will involve structure height changes due to transmission and distribution clearance issues.

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

- (2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing transmission line, or replacing structures with a different type of structure, for a distance of:*
(a) Two miles or less.

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.

Duke Energy Ohio performs routine and consistent inspections of existing transmission line assets within its system. Four wood pole structures, including a stub pole for guy wires, along the F7481 138 kV circuit in the City of Blue Ash, Hamilton County, Ohio were identified for replacement due to failed inspections, uplift, and/or clearance issues. Replacing these wood pole structures with new steel pole structures will improve the reliability of the local community's electricity. The Project will increase Duke Energy Ohio's ability to maintain and efficiently operate its system in the area. The proposed Project will 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. Figures 2A and 2B depict the planned location of the proposed structure replacements along the F7481 138 kV transmission circuit.

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 Project is located along an existing transmission circuit where distribution equipment is required. The Project will occur entirely within existing right-of-way. 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.

The Project is located entirely within Duke Energy Ohio right-of-way. Any impacted property owner(s) will be notified prior to construction activities. Further information on the ongoing status of this Project can be found at the following website:

www.duke-energy.com/GLT7481Phase1.

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 October 2022, pending approval of this Construction Notice. The Project is anticipated to be completed and in service by November 2022.

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

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

Attachment A – Figures depicts the general location of the Project. Figure 1 depicts the general Project vicinity on a USGS quadrangle topographic map. Figures 2A and 2B depict the planned new transmission pole location on an aerial photograph.

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 wood pole structure located at Pfieffer Road and Kenwood Road is on Parcel 061201400201. Its associated stub pole for guy wires is located across Kenwood Road on Parcel 061201500033. The three wood poles along Malsbary Road are located on Parcel 061201200100. The entire Project is within existing right-of-way. No new right-of-way is necessary for the Project.

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 the addition of a transmission pole between two existing structures on the F7481 138 kV circuit. The structure will allow for the installation of distribution equipment. The technical features are shown in Figures 2A and 2B.

4906-6-05(B)(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

Voltage:	138-kV
Structure Type:	Wood direct embed structures being replaced with steel direct embed structures increasing between 2.25 and 15ft due to distribution clearances.
Conductors:	Transfer of existing 795 AAC 37 STR conductor
Static Wire:	1/0 AAAC static
Insulators:	138 kV polymer 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.

No residences or institutions are located within 100 feet of the Project. 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 approximately \$530,000. This estimate includes installation of the new transmission structure and necessary equipment.

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 City of Blue Ash, Hamilton County, Ohio. The proposed structure installations will occur entirely within existing easements adjacent to commercial properties. 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 Project is in an urban area immediately adjacent to local streets and commercial properties. None of this area has been used for agricultural purposes. No Agricultural District Land parcels were identified at or adjacent to the Project. 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

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 August 9, 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) Information for Planning and Consultation (IPaC) website lists the Project area within the range of the Indiana bat (*Myotis sodalis*; federally endangered), northern long-eared bat (*Myotis septentrionalis*; federally threatened) and Monarch butterfly (*Danaus plexippus*; federal candidate). Coordination with the Ohio Department of Natural Resources (ODNR) was initiated in an effort to identify the Project's potential effect on any federally or state listed Endangered, Threatened and Rare (ETR) species or critical habitat. A response from ODNR was provided on August 15, 2022. No records of state or federally listed plants or animals were reported within one mile of the Project. ODNR identified two additional bats, 13 mussels, 12 fishes, three bird, and Kirtland's snake, and cave salamander with ranges within the Project area. However, no potential bat habitat trees are located within the Project work areas. No streams were observed within the Project work areas; therefore, no aquatic species would be present. Habitat for the other species was also not observed. No impacts to ETR species are anticipated. The agency correspondence is included in Attachment C – ODNR Comments.

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 within 100 feet surrounding the proposed pole location. No wetlands, streams, or other areas of ecological concern were identified. V3 Companies' field investigation can be found in Attachment D – 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.

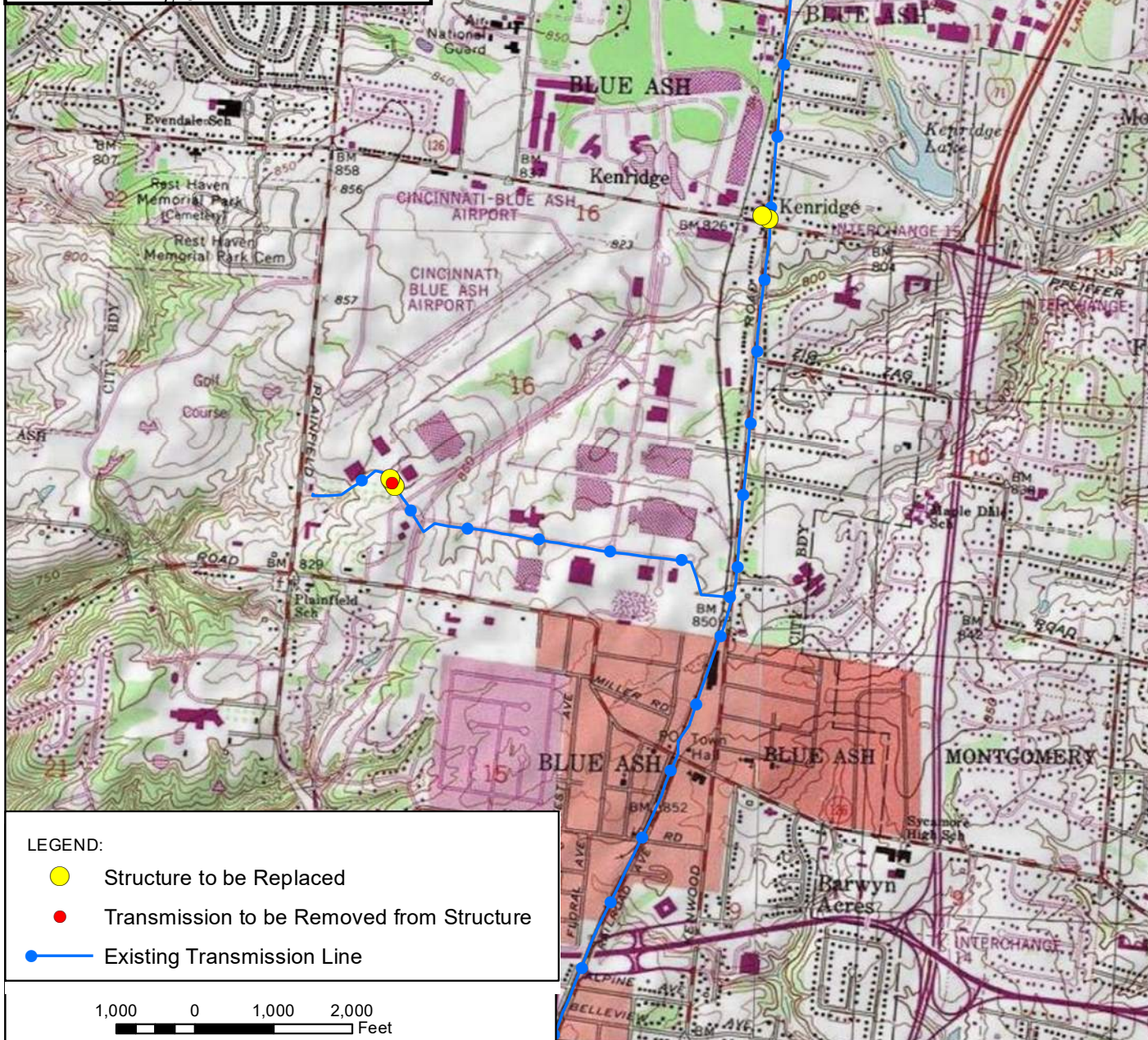
Maintain on its website information as to how to request an electronic or paper copy of the application. Upon request for a paper copy of the application, the applicant shall supply the copy within five business days and at no more than cost.

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 Construction Notice has been sent to the appropriate public officials for Hamilton County and the City of Blue Ash. Additionally, a link has been sent to the City of Cincinnati & Hamilton County Public Library – Blue Ash Branch.

Duke Energy Ohio will maintain a copy of this Application on its website at: www.duke-energy.com/GLT7481Phase1.

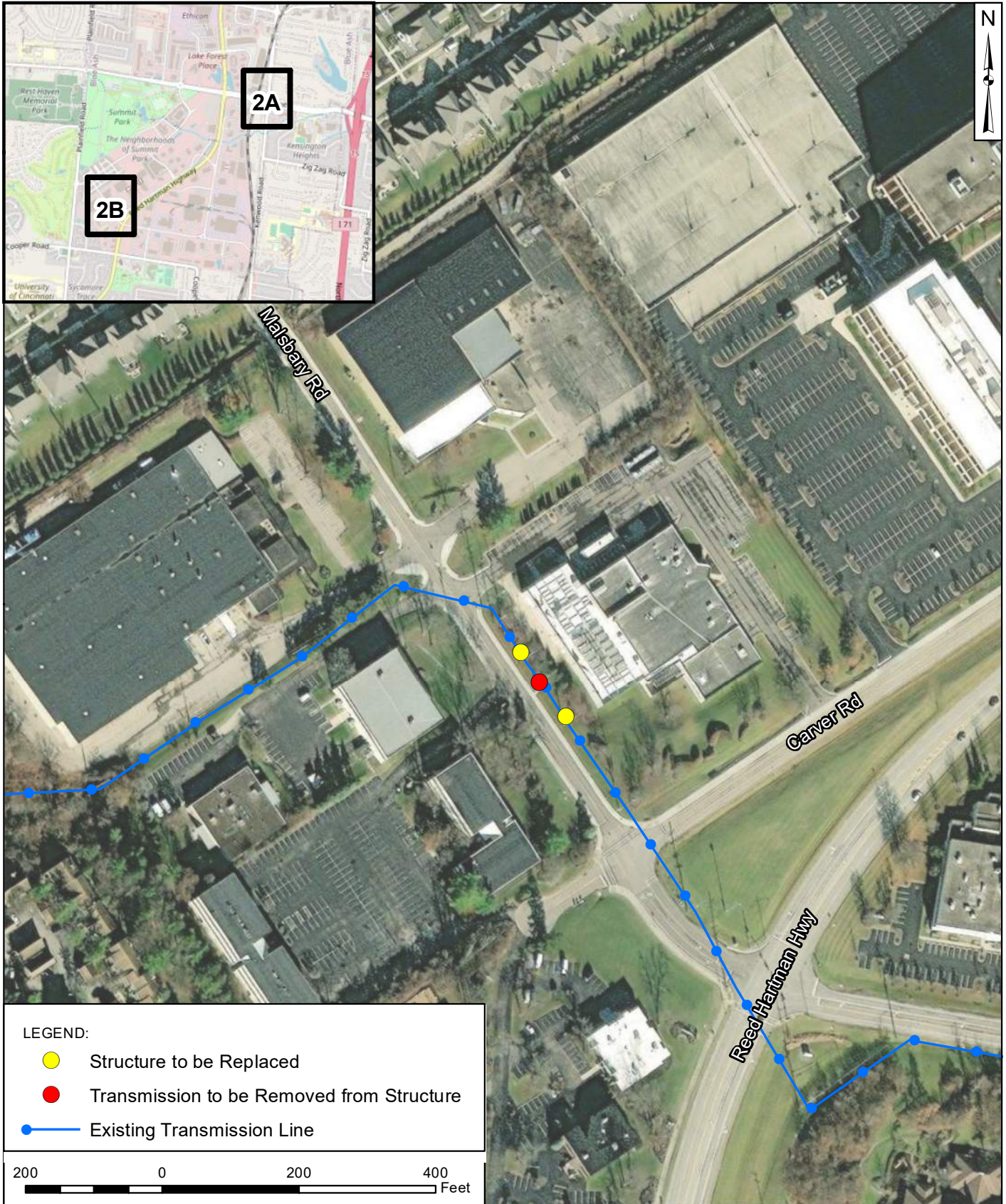
ATTACHMENT A – FIGURES



 <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.: 20568.035</p>	 <p>CLIENT: DUKE ENERGY</p>	<p>TITLE: PROJECT LOCATION</p>	
	<p>CREATED BY: ARG</p>			
	<p>DATE: 08/25/2022</p>	<p>BASE LAYER: ESRI USA Topo Maps 2013</p>	<p>SITE: F7481 Wood Pole Replacement Project Hamilton County, Ohio</p>	<p>FIGURE: 1</p>
	<p>SCALE: See Scale Bar</p>			



 <p>312 Walnut Street Suite 1600 Cincinnati, Ohio 45202 513-800-3622 phone www.v3co.com</p>	PROJECT NO.: 20568.035		<p>PROJECT LAYOUT</p>	
	CREATED BY: ARG			
<p>Visio, Vertere, Virtute... "The Vision To Transform with Excellence"</p>	DATE: 08/25/2022	<p>BASE LAYER: ESRI World Imagery 2020</p>	<p>SITE: F7481 Wood Pole Replacement Project Hamilton County, Ohio</p>	<p>FIGURE: 2A</p>
	SCALE: See Scale Bar			



 <p>312 Walnut Street Suite 1600 Cincinnati, Ohio 45202 513-800-3622 phone www.v3co.com</p>	PROJECT NO.: 20568.035		PROJECT LAYOUT	
	CREATED BY: ARG			
Visio, Vertere, Virtute... "The Vision To Transform with Excellence"	DATE: 08/25/2022	BASE LAYER: ESRI World Imagery 2020	SITE: F7481 Wood Pole Replacement Project Hamilton County, Ohio	FIGURE: 2B
	SCALE: See Scale Bar			

ATTACHMENT B – CULTURAL RESOURCES CONCURRENCE



In reply refer to
2022-HAM-55453

August 9, 2022

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

Dear Mr. Geckle:

RE: Duke Energy F7481 Wood Pole Replacement, Blue Ash, Hamilton County, Ohio

This is in response to the receipt of correspondence, on July 29, 2022, regarding the proposed transmission pole replacements 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

ATTACHMENT C – ODNR COMMENTS



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

August 15, 2022

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

Re: 22-0727; Duke Energy GLT F7481 Wood Pole Replacements Project (M200304)

Project: The proposed project involves the replacement of up to 16 existing structures due to failed inspections, uplift, or clearance issues. The project will require Ohio Power Siting Board (OPSB) approval.

Location: The proposed project is located in Sycamore and Columbia Townships, Hamilton 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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.

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 Eileen Wyza at Eileen.Wyza@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 & NORTHERN LONG-EARED 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 Eileen Wyza 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

fanshell (*Cyprogenia stegaria*)
pink mucket (*Lampsilis orbiculata*)
rayed bean (*Villosa fabalis*)
sheepnose (*Plethobasus cyphus*)
snuffbox (*Epioblasma triquetra*)

State Endangered

butterfly (*Ellipsaria lineolata*)
ebonyshell (*Fusconaia ebena*)
elephant-ear (*Elliptio crassidens crassidens*)
long-solid (*Fusconaia maculata maculata*)
monkeyface (*Quadrula metanevra*)
Ohio pigtoe (*Pleurobema cordatum*)
wartyback (*Quadrula nodulata*)
washboard (*Megaloniaias nervosa*)

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 following listed fish species.

State Endangered

bigeye shiner (*Notropis boops*)
lake sturgeon (*Acipenser fulvescens*)
northern madtom (*Noturus stigmosus*)

popeye shiner (*Notropis ariommus*)
shoal chub (*Macrhybopsis hyostoma*)
shortnose gar (*Lepisosteus platostomus*)
shovelnose sturgeon (*Scaphirhynchus platyrhynchus*)

State Threatened

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

The DOW recommends no in-water work in perennial streams from March 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 these or other aquatic species.

The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet meadows and other wetlands. 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 cave salamander (*Eurycea lucifuga*), a state endangered species. 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 American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. 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 least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. 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 trumpeter swan (*Cygnus buccinator*), a state threatened bird. Trumpeter swans prefer large marshes and lakes ranging in size from 40 to 150 acres. They like shallow wetlands one to three feet deep with a diverse mix of plenty of emergent and submergent vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through June 15. If this habitat will not be impacted, this project is not likely to have an impact on 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 Sycamore and Columbia Townships, Hamilton County. This area is in the Illinoian Till Plain physiographic region. This region is characterized by rolling ground moraine composed of older till. This area typically lacks ice-constructional features such as moraines, kames, and eskers. Many buried valleys are associated with this area. Modern valleys alternate between broad floodplains and bedrock gorges. A silt-loam, high-lime Illinoian-age till covers Ordovician-age bedrock. This till is frequently capped by loess (Ohio Department of Natural Resources, Division of Geological Survey, 1998).

Surficial/Glacial Geology

The project area lies within the glaciated margin of the state and includes several Illinoian-age glacial features. Most of the project area is covered by silty, loess covered, loam till of the flat continuous Illinoian ground moraine. Shale and limestone bedrock may be at the surface in deep, stream-cut ravines (Pavey et al, 1999). Glacial drift throughout most of the study area is absent to 104 feet thick. Drift is thinnest in ravines (Powers and Swinford, 2004).

Bedrock Geology

The uppermost bedrock unit in the project area is the Waynesville Formation and Arnheim Formations Undivided. This unit is Ordovician-age and consists of interbedded shale and limestone. The formation is bluish gray and contains planar and irregular bedding. The Waynesville and Arnheim Formations can be found in the central uplands. Underlying the Waynesville Formation and Arnheim Formations Undivided is the Ordovician-age Grant Lake Formation. This unit is characterized by interbedded gray to bluish gray limestone and shale. Bedding may be planar, wavy, irregular, or nodular. Underlying the Grant Lake Formation is the Ordovician-age Miami Shale-Fairview Formation Undivided. This unit is characterized by blueish gray interbedded limestone and shale with planar to nodular bedding. Bedrock may be exposed in outcrops and roadcuts within the boundary of the project area (Slucher et al, 2006).

Oil, Gas and Mining

ODNR has record of one oil and gas well within one mile of the proposed project area. This well is listed as plugged and abandoned (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 the former Carlisle Equipment Group's shale, limestone, and clay quarry located adjacent to I-75. This mine is 3.1 miles from the project area (Ohio Department of Natural Resources, Division of Mineral Resources, Mines of Ohio).

Seismic Activity

Several small earthquakes have historically been recorded near the site. 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
October 8, 1936	3.3	3.6 miles	Butler	West Chester
April 4, 1925	2.5	6.2 miles	Campbell, KY	Fort Thomas
October 17, 1937	2.9	7.2 miles	Hamilton	Cincinnati

Karst

Karst features usually form in areas that are covered by thin or no glacial drift and the bedrock is limestone or dolomite. Sinkholes are common in Hamilton County and the project area is surrounded by active, field-verified sinkholes. Although the nearest sinkhole is 1.3 miles away, the underlying limestone is susceptible to the formation of sinkholes, especially where drift is thin. Engineers and project managers should be aware of voids and sinkholes in the bedrock when setting footings and take the necessary engineering precautions if encountered (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Karst).

Soils

According to the USDA Web Soil Survey, the project area consists primarily of soils derived from Urban land and Udorthents (USDA Web Soil Survey). There is a moderate risk of shrink-swell potential in these soils. Slope is variable and exceeds a 6% grade (Lerch et al, 1982 and USDA Web Soil Survey).

Groundwater

Groundwater resources are limited throughout the project area. Wells developed in bedrock are likely to yield up to five gallons per minute. The interbedded sedimentary rocks beneath the project area are a poor aquifer (Walker, 1986 and Ohio Department of Natural Resources, Division of Water, Bedrock Aquifer Map, 2000). Wells developed in glacial material are likely to yield up to 25 gallons per minute. Yields are greatest in the northern portion of the project area where drift is thickest, in the Mason Ground Moraine Aquifer (Ohio Department of Natural Resources, Division of Water, Statewide Unconsolidated Aquifer Map, 2000).

ODNR has record of 106 water wells drilled within one mile of the project area. Ninety-five of these wells are monitoring wells with an average depth of 16 feet. There are ten domestic water wells within one mile of the project area. These wells range in depth from 30 to 132 feet, with an average depth of 61 feet. The most common aquifer listed for domestic wells is rock (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.

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

ATTACHMENT D – NATURAL RESOURCES ASSESSMENT



16 August 2022

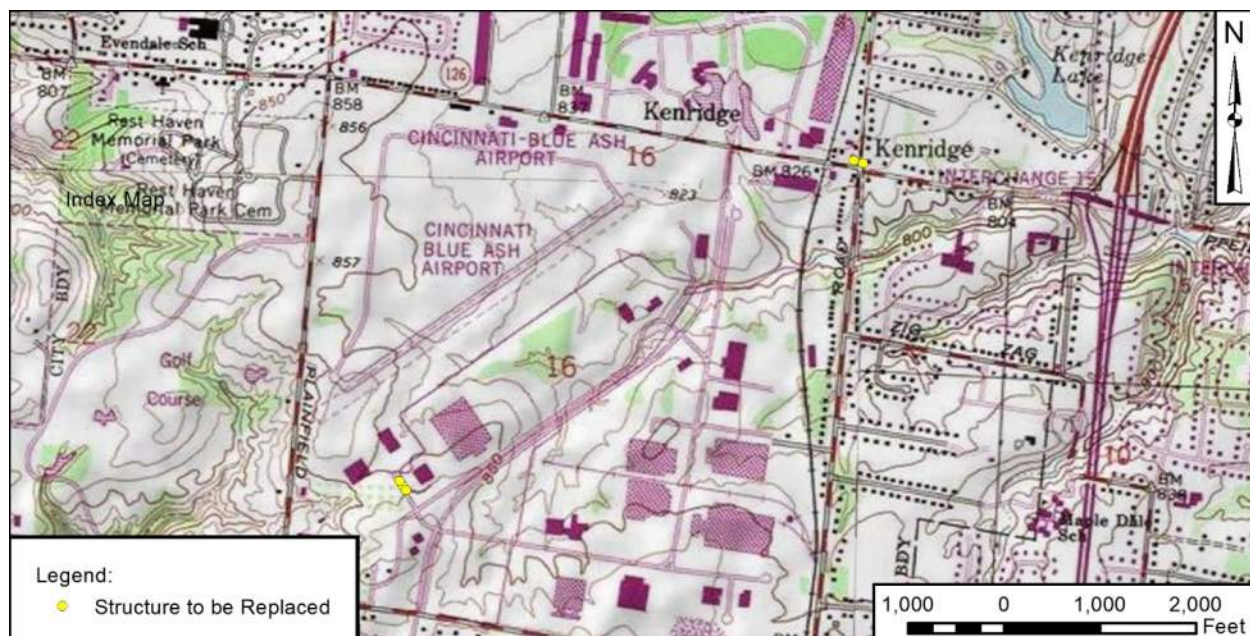
Mr. Dustin Giesler
Duke Energy
315 Main Street
Mail Code EX 0446-06
Cincinnati, Ohio 45202-4161

RE: F7481 Circuit Wood Pole Replacements Project
Natural Resources Assessment Letter Report
City of Blue Ash, Hamilton County, Ohio

Dear Mr. Giesler,

The purpose of this report is to describe the findings of a natural resource assessment of the proposed the F7481 Circuit Wood Pole Replacements Project (Project) located in the City of Blue Ash, Hamilton County, Ohio (SITE) for evidence of wetlands and/or other jurisdictional "Waters of the U.S." Duke Energy Ohio proposes to replace four wood pole structures along the F7481 Circuit, including one stub pole for guy wires, due to failed inspections, uplift, or clearance issues. These four wood poles will be replaced with new steel poles. One wood pole structure will have transmission attachments removed but the wood pole will remain in place for distribution purposes. New poles will be within 10 feet of their current locations with a height increase of no more than 15 feet, although most shifts and height increases will be substantially less than the maximums. The poles to be replaced are situated in the Cincinnati East and Glendale, Ohio U.S. Geological Survey (USGS) 7.5 Minute Quadrangle Maps (**Figure 1**). A conservative 100-foot buffer of each pole to be replaced was established as the study area to account for access to the pole location and adjacent work areas.

Figure 1: USGS Topographic Map Cincinnati East, Glendale, Madeira, and Mason Quadrangles



Desktop Review

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.

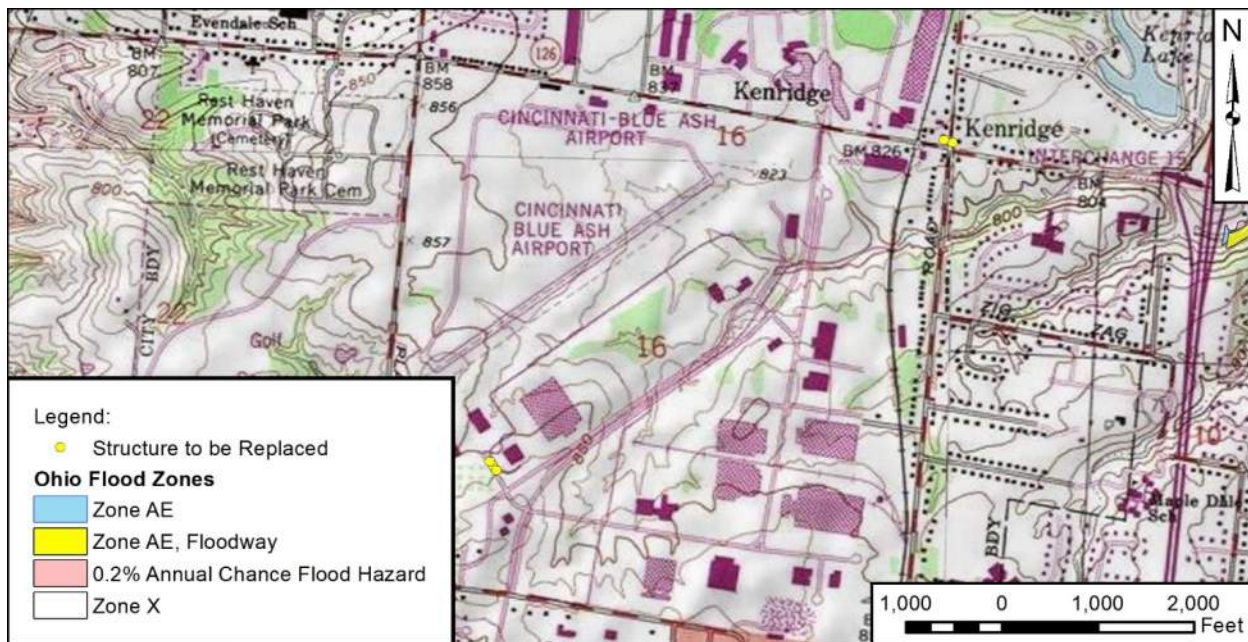
V3 reviewed the Natural Resources Conservation Service (NRCS) Web Soil Survey data of Hamilton County, Ohio in order to identify distinct soil unit boundaries in the SITE. Review of the map indicates that the SITE is situated within the Urban land-Udorthents complex, smoothed, 0 to 50 percent slopes (UsUXF) and Urban land-Udorthents complex, 0 to 12 percent slopes (UrUXC) soil units. These soil units indicate previously disturbed soils consistent with urban development. These soils were not identified as hydric. **Figure 2** provides a map of the soil series crossed by the Project.

This map shows the Cincinnati Blue Ash Airport area, including the airport itself and surrounding residential and commercial zones. The map is overlaid with various land use codes (e.g., UfAXC, UrUXC, UAGXC, UcAXD, JoR1A1, WsS1A1, UcAXF, JoR1B2, UaVXC, UaEXD, UaUXF, UaUXC, UaUXD, UaUXE, UaUXF, UaUXG, UaUXH, UaUXI, UaUXJ, UaUXK, UaUXL, UaUXM, UaUXN, UaUXO, UaUXP, UaUXQ, UaUXR, UaUXS, UaUXT, UaUXU, UaUXV, UaUXW, UaUXX, UaUXY, UaUXZ) and structures to be replaced (indicated by yellow dots). The map also shows the Cincinnati Blue Ash Airport, the Cincinnati Blue Ash Airport Runway, and the Cincinnati Blue Ash Airport Taxiway. A legend in the bottom left corner indicates that yellow dots represent structures to be replaced. A scale bar in the bottom right corner shows distances in feet (0, 1,000, 2,000). A north arrow is located in the top right corner.

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 SITE is not located within a regulated floodway or flood zone. No flood permitting is required. **Figure 3** provides a map showing the flood zones in the project area.

Figure 3: Flood Zones in the Project Area



Endangered, Threatened, and Rare Species Evaluation

The United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website lists the Project area within the range of the Indiana bat (*Myotis sodalis*; federally endangered), northern long-eared bat (*Myotis septentrionalis*; federally threatened) and Monarch butterfly (*Danaus plexippus*; federal candidate). Coordination with the Ohio Department of Natural Resources (ODNR) was initiated in an effort to identify the Project's potential effect on any federally or state Endangered, Threatened and Rare (ETR) species or critical habitat. A response from ODNR was provided on 15 August 2022. No records of state or federally listed plants or animals were reported within one mile of the SITE. ODNR identified two additional bats, 13 mussels, 12 fishes, three bird, and Kirtland's snake, and cave salamander with ranges within the Project area. 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 proposed pole replacement areas consisted of an existing right-of-way covered by turf grass or pavement adjacent to local streets (**Figures 4A and 4B**). Evidence of fill from past land disturbance was observed. Adjacent land use included residential and commercial properties as well as transportation corridors.

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

No wetlands, streams, or drainage features were identified on-SITE. **Figures 4A and 4B** depict the Delineation Area Map and photo locations.

Figure 4A: Delineation Area Map

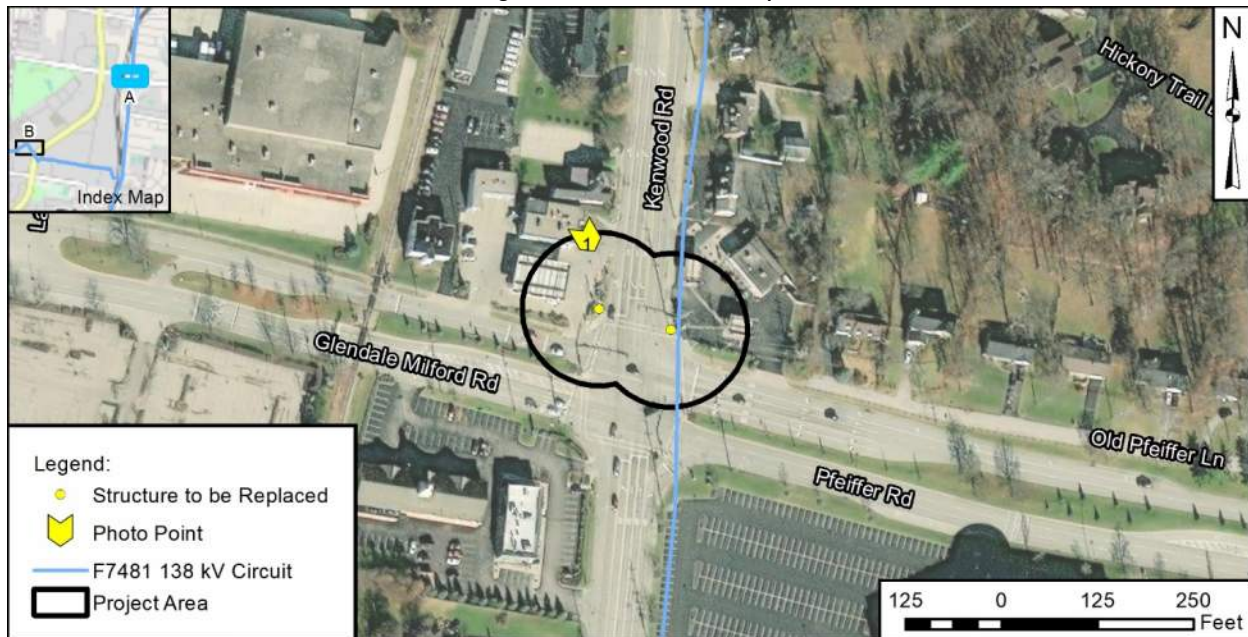
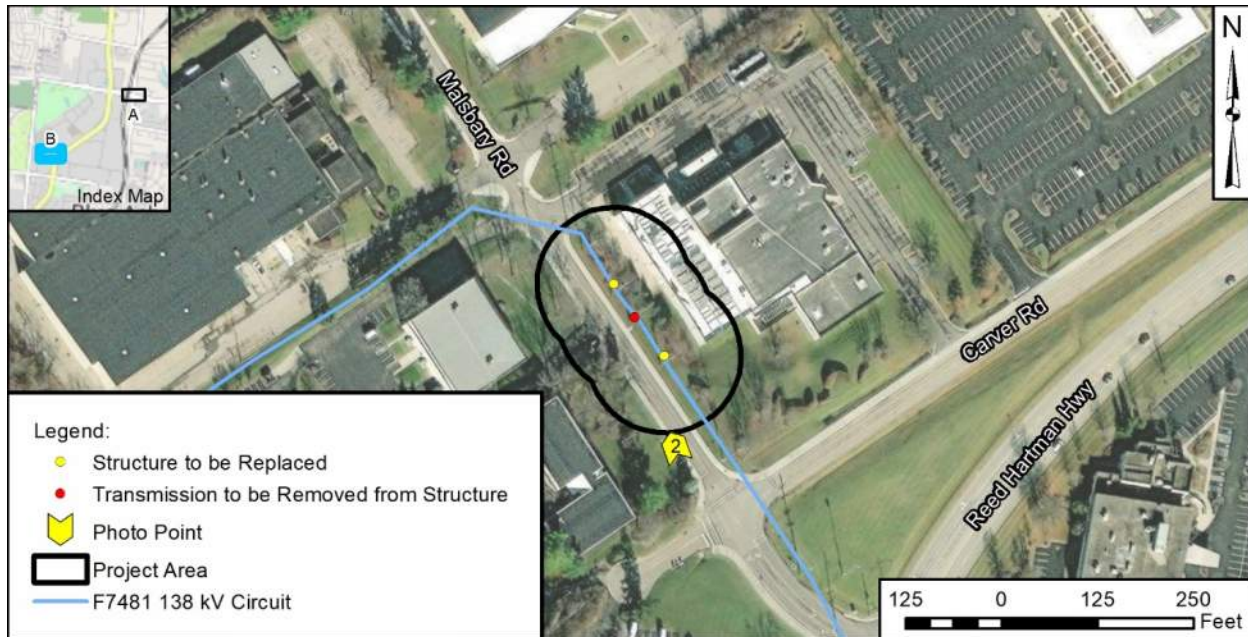


Figure 4B: Delineation Area Map



SITE Photos

During the field reconnaissance of the SITE completed on 25 July 2022, V3 took digital photographs to document existing conditions and areas of interest.



Photo 1: Looking SE at North Project area



Photo 2: Looking NW view of North Project area

Conclusions

Based on the criteria established by the USACE 1987 manual and the 2010 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 Urban land-Udorthents complex, smoothed, 0 to 50 percent slopes (UsUXF) and Urban land-Udorthents complex, 0 to 12 percent slopes (UrUXC) soil units. These soil units indicate previously disturbed soils consistent with urban development. These soils were not identified as hydric. No ETR species habitat was observed on-SITE.

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



Aaron Geckle
Senior Project Manager



Jeffrey S. Moody
Regulatory Services Group Leader

Attachment A

ETR Species Correspondence





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

August 15, 2022

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

Re: 22-0727; Duke Energy GLT F7481 Wood Pole Replacements Project (M200304)

Project: The proposed project involves the replacement of up to 16 existing structures due to failed inspections, uplift, or clearance issues. The project will require Ohio Power Siting Board (OPSB) approval.

Location: The proposed project is located in Sycamore and Columbia Townships, Hamilton 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

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.

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 Eileen Wyza at Eileen.Wyza@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 & NORTHERN LONG-EARED 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 Eileen Wyza 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

fanshell (*Cyprogenia stegaria*)
pink mucket (*Lampsilis orbiculata*)
rayed bean (*Villosa fabalis*)
sheepnose (*Plethobasus cyphus*)
snuffbox (*Epioblasma triquetra*)

State Endangered

butterfly (*Ellipsaria lineolata*)
ebonyshell (*Fusconaia ebena*)
elephant-ear (*Elliptio crassidens crassidens*)
long-solid (*Fusconaia maculata maculata*)
monkeyface (*Quadrula metanevra*)
Ohio pigtoe (*Pleurobema cordatum*)
wartyback (*Quadrula nodulata*)
washboard (*Megaloniaias nervosa*)

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 following listed fish species.

State Endangered

bigeye shiner (*Notropis boops*)
lake sturgeon (*Acipenser fulvescens*)
northern madtom (*Noturus stigmosus*)

popeye shiner (*Notropis ariommus*)
shoal chub (*Macrhybopsis hyostoma*)
shortnose gar (*Lepisosteus platostomus*)
shovelnose sturgeon (*Scaphirhynchus platyrhynchus*)

State Threatened

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

The DOW recommends no in-water work in perennial streams from March 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 these or other aquatic species.

The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet meadows and other wetlands. 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 cave salamander (*Eurycea lucifuga*), a state endangered species. 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 American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. 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 least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. 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 trumpeter swan (*Cygnus buccinator*), a state threatened bird. Trumpeter swans prefer large marshes and lakes ranging in size from 40 to 150 acres. They like shallow wetlands one to three feet deep with a diverse mix of plenty of emergent and submergent vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through June 15. If this habitat will not be impacted, this project is not likely to have an impact on 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 Sycamore and Columbia Townships, Hamilton County. This area is in the Illinoian Till Plain physiographic region. This region is characterized by rolling ground moraine composed of older till. This area typically lacks ice-constructional features such as moraines, kames, and eskers. Many buried valleys are associated with this area. Modern valleys alternate between broad floodplains and bedrock gorges. A silt-loam, high-lime Illinoian-age till covers Ordovician-age bedrock. This till is frequently capped by loess (Ohio Department of Natural Resources, Division of Geological Survey, 1998).

Surficial/Glacial Geology

The project area lies within the glaciated margin of the state and includes several Illinoian-age glacial features. Most of the project area is covered by silty, loess covered, loam till of the flat continuous Illinoian ground moraine. Shale and limestone bedrock may be at the surface in deep, stream-cut ravines (Pavey et al, 1999). Glacial drift throughout most of the study area is absent to 104 feet thick. Drift is thinnest in ravines (Powers and Swinford, 2004).

Bedrock Geology

The uppermost bedrock unit in the project area is the Waynesville Formation and Arnheim Formations Undivided. This unit is Ordovician-age and consists of interbedded shale and limestone. The formation is bluish gray and contains planar and irregular bedding. The Waynesville and Arnheim Formations can be found in the central uplands. Underlying the Waynesville Formation and Arnheim Formations Undivided is the Ordovician-age Grant Lake Formation. This unit is characterized by interbedded gray to bluish gray limestone and shale. Bedding may be planar, wavy, irregular, or nodular. Underlying the Grant Lake Formation is the Ordovician-age Miami Shale-Fairview Formation Undivided. This unit is characterized by blueish gray interbedded limestone and shale with planar to nodular bedding. Bedrock may be exposed in outcrops and roadcuts within the boundary of the project area (Slucher et al, 2006).

Oil, Gas and Mining

ODNR has record of one oil and gas well within one mile of the proposed project area. This well is listed as plugged and abandoned (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 the former Carlisle Equipment Group's shale, limestone, and clay quarry located adjacent to I-75. This mine is 3.1 miles from the project area (Ohio Department of Natural Resources, Division of Mineral Resources, Mines of Ohio).

Seismic Activity

Several small earthquakes have historically been recorded near the site. 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
October 8, 1936	3.3	3.6 miles	Butler	West Chester
April 4, 1925	2.5	6.2 miles	Campbell, KY	Fort Thomas
October 17, 1937	2.9	7.2 miles	Hamilton	Cincinnati

Karst

Karst features usually form in areas that are covered by thin or no glacial drift and the bedrock is limestone or dolomite. Sinkholes are common in Hamilton County and the project area is surrounded by active, field-verified sinkholes. Although the nearest sinkhole is 1.3 miles away, the underlying limestone is susceptible to the formation of sinkholes, especially where drift is thin. Engineers and project managers should be aware of voids and sinkholes in the bedrock when setting footings and take the necessary engineering precautions if encountered (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Karst).

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The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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

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9/8/2022 1:26:30 PM

in

Case No(s). 22-0801-EL-BNR

Summary: Notice Construction Notice For The F7481 Wood Pole Replacement (Northern Hamilton County) electronically filed by Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Kingery, Jeanne and Akhbari, Elyse Hanson and Vaysman, Larisa