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CLECO POWER LLC DOLET HILLS POWER STATION



WETLANDS ASSESSMENT

ASH BASIN NO. 1

Prepared By:

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Project Number 002-212



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1.0 INTRODUCTION

Providence was contracted by Cleco Power LLC (Cleco) to conduct a wetlands assessment of Ash Basin No. 1 at Cleco's Dolet Hills Power Station. Recent Coal Combustion Residual (CCR) regulations at 40 CFR 257.61 established requirements for owners and operators to conduct a wetlands assessment by a qualified professional engineer.

40 CFR 257.61 (a) states that *new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in Section 232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs below:*

- *Where applicable under Section 404 of the Clean Water Act or applicable state wetlands laws, a clear and objective rebuttal of the presumption that an alternative to the CCR unit is reasonably available that does not involve wetlands.*
- *The construction and operation of the CCR unit will not cause or contribute to any of the following:*
 - *A violation of any applicable state or federal water quality standard;*
 - *A violation of any applicable toxic effluent standard or prohibition under section 307 of the Clean Water Act;*
 - *Jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of a critical habitat, protected under the Endangered Species Act of 1973; and*
 - *A violation of any requirement under the Marine Protection, Research, and Sanctuaries Act of 1972 for the protection of marine sanctuary.*
- *The CCR unit will not cause or contribute to significant degradation of wetlands by addressing all of the following factors:*
 - *Erosion, stability, and migration potential of native wetland soils, muds, and deposits used to support the CCR unit;*
 - *Erosion, stability, and migration potential of dredged and fill materials used to support the CCR unit;*
 - *The volume and chemical nature of the CCR;*
 - *Impacts of fish, wildlife, and other aquatic resources and their habitat from release of CCR;*
 - *The potential effects of catastrophic release of CCR to the wetland and the resulting impacts on the environment; and*
 - *Any additional factors, as necessary, to demonstrate that ecological resources in the wetland are sufficiently protected.*
- *To the extent required under section 404 of the Clean Water Act or applicable state wetlands laws, steps have been taken to attempt to achieve no net loss of wetlands (as defined by acreage and function) by first avoiding impacts to wetlands to the maximum extent reasonable as required by paragraphs (a)(1) through (3) of this section, then minimizing unavoidable impacts to the maximum extent reasonable, and finally offsetting remaining unavoidable wetland impacts through all appropriate and reasonable compensatory mitigation actions (e.g., restoration of existing degraded wetlands or creation of man-made wetlands); and*
- *Sufficient information is available to make a reasoned determination with respect to the demonstrations in paragraphs (a)(1) through (4) of this section.*

The Cleco Dolet Hills Power Station is approximately eight miles southeast of Mansfield, DeSoto Parish, LA. A site location map showing the Dolet Hills Power Station is included as **Figure 1**.

This wetlands assessment pertains to Ash Basin No. 1 surface impoundment utilized for the Unit 1 coal-fired generation unit. A site map for Ash Basin No. 1 is included as **Figure 2**. For an existing CCR surface impoundment, the wetlands assessment must be completed no later than October 17, 2018.

2.0 WETLANDS AND ECOLOGICAL ASSESSMENT

Wetlands

According to documentation in the *Final Environmental Impact Statement (EIS) Dolet Hills Power Plant Project Northwestern Louisiana*, issued in April of 1982, South Western Electric Power Company/Cleco requested that the United States Army Corps of Engineers (USACE), New Orleans District determine the applicability of a Section 10/404 permit for the Dolet Hills Power Plant and associated transportive system on August 26, 1981. Supplemental information was provided to the USACE on September 9th and 18th. On September 22nd, the USACE determined that dredging activities in Bayou Pierre for the construction of the railroad trestle would require a permit but the trestle itself falls under the authority of the U.S. Coast Guard. In subsequent contact with the New Orleans District, it was determined that the construction of the railroad would require a Section 10 permit from the USACE and that no Section 404 permit would be necessary.

Therefore, it is apparent that there was no requirement for a Section 404 permit to construct Ash Basin No. 1 as the site was determined to be non-wetlands and not under the jurisdiction of the New Orleans District.

As part of the National Pollutant Discharge Elimination System (NPDES) permitting process, discharges from Ash Basin No. 1 were evaluated and assessed by the U.S. Environmental Protection Agency (EPA) prior to issuance of the facility's original NPDES permit which became effective on July 26, 1982. In this permit, EPA established limitations for discharges from Ash Basin No. 1 to ensure compliance with applicable water quality criteria. Compliance with the effluent limitations ensures that the discharges from Ash Basin No. 1 will not cause or contribute to an exceedance of a water quality criterion.

Furthermore, the effluent compliance history and supplemental application data on the quality of the effluent discharged from Ash Basin No. 1 has been evaluated during each permit renewal by the EPA and the Louisiana Department of Environmental Quality (LDEQ). Review of the data during every renewal term ensures that the continued discharge from Ash Basin No. 1 has not and will not cause or contribute to an exceedance of the applicable water quality criteria. In addition, the NPDES permit requires compliance with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants. At no time during evaluation and reissuance of each NPDES permit has LDEQ or EPA documented or demonstrated that effluent exceedances or the discharge of toxics has occurred which has resulted in the violation of any applicable water quality criteria. There has been no violation of any applicable water quality criteria associated with Ash Basin No. 1.

Endangered Species

Federally-listed threatened and/or endangered species in DeSoto Parish include:

- Northern long-eared bat (*Myotis septentrionalis*)
- Earth fruit (*Geocarpon minimum*)
- Red-cockaded woodpecker (*Picoides borealis*)

Habitat requirements for listed species is described in the following sections.

Northern long-eared bat. Wintering northern long-eared bats prefer caves and mines with large passages and entrances, constant temperatures, and high humidity with no air currents. During the summer months, the species prefer to roost underneath bark, in cavities, or in crevices of live and dead trees. Some males and non-reproductive females can also be found in caves and mines due to cooler temperatures. Breeding begins in late summer or early fall. The species can be found in the eastern and north central United States.

In Louisiana, **earth fruit** is found in saline-alkaline soils on the edge of highly localized, surficial concentrations of sodium and magnesium, locally known as 'slicks'. These nearly barren patches of mineral soil are nearly absent of woody plants and are scattered across savanna-like formations classified as saline soil prairies. The species grows predominantly on the Bonn, Brimstone, and Lafa soil series.

Suitable **red-cockaded woodpecker** (RCW) foraging habitat is defined as a contiguous 10-acre stand of pine or pine-hardwood forest in which 50% or more of the dominant trees are pines with a minimum age of 30 years. Suitable RCW nesting habitat was defined as foraging habitat containing any pines 60 years of age or older. The pines could be scattered or clumped within younger stands. Old age pines have thinner sapwood and a larger heartwood diameter and have a greater chance of being affected by a fungus which results in the heartwood decaying and makes excavation easier for drilling nesting and roosting cavities.

From the EIS, no plant communities or wildlife habitats within the power plant site or transportive corridors are unique to the area. Based on habitat requirements of the listed species, adverse impacts to those species as well as impacts to critical habitats are not likely to occur.

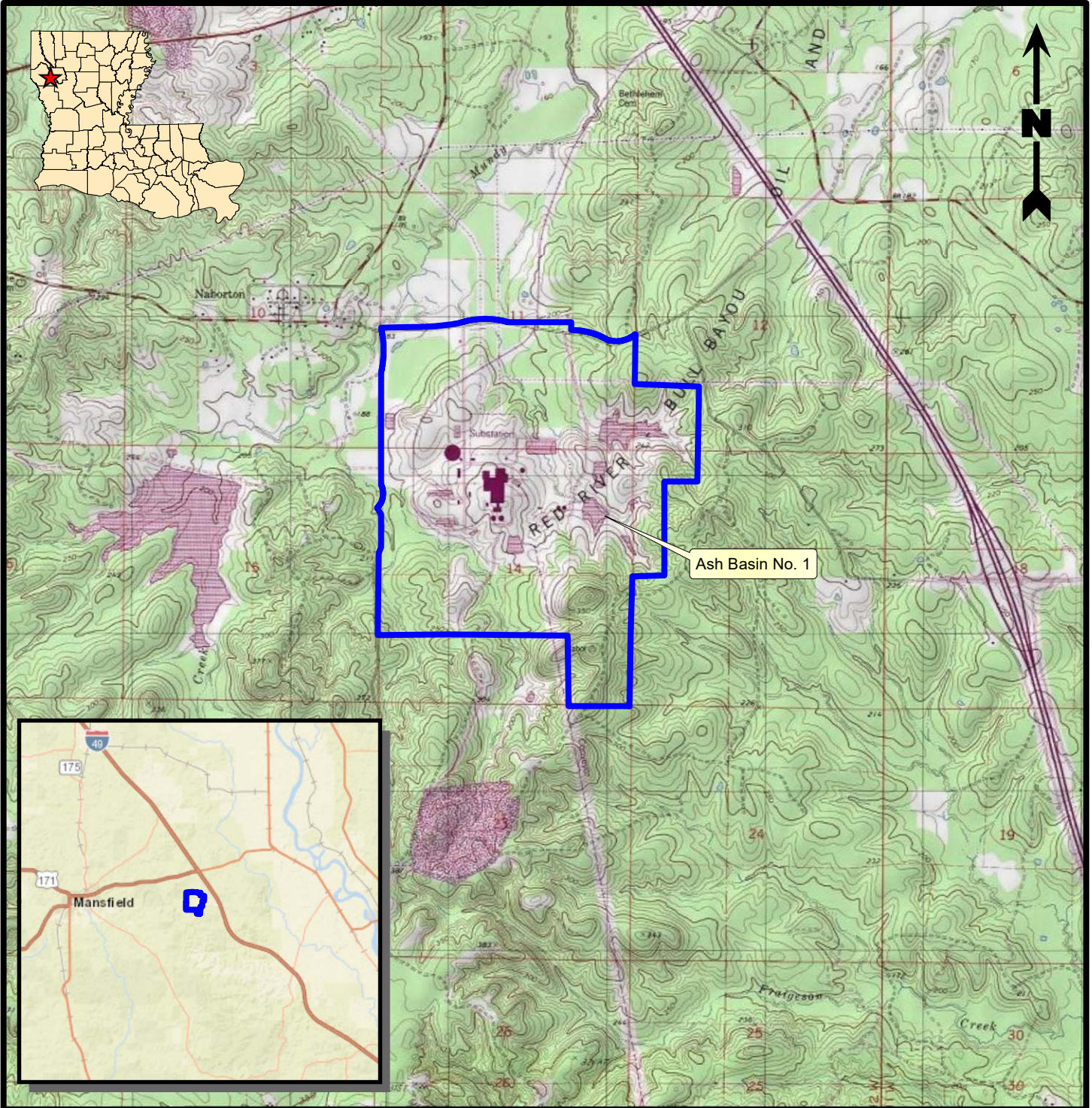
Marine Protection, Research, and Sanctuaries Act

The Marine Protection, Research, and Sanctuaries Act is not applicable at this site.

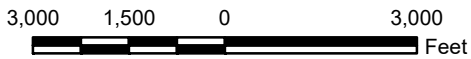
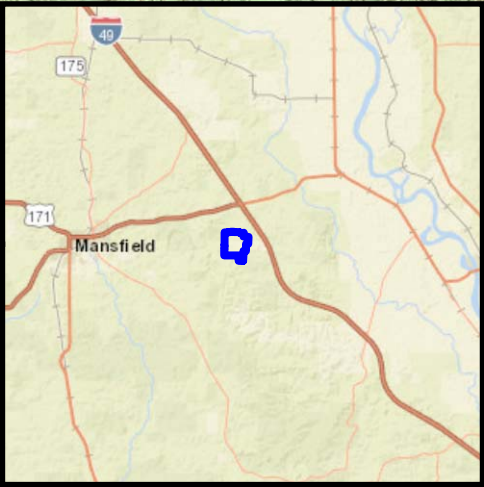
3.0 CONCLUSIONS

Based on the results of the wetlands assessment, Ash Basin No. 1 was not constructed in wetlands under the jurisdiction of the USACE and that significant degradation of wetlands is not occurring. The NPDES permit requires compliance with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants. At no time during evaluation and reissuance of each NPDES permit has LDEQ or EPA documented or demonstrated that effluent exceedances or the discharge of toxics has occurred which has resulted in the violation of any applicable water quality criteria. Based on the habitat requirements for the species listed as threatened and/or endangered under the Endangered Species Act of 1973, the continued existence of listed species and/or their critical habitat is not jeopardized. **Appendix A** contains a P.E. Certification that attests to this assessment.


FIGURE 1
SITE LOCATION MAP



Ash Basin No. 1



Legend

 Facility Boundary

Reference

Base map comprised of United States Geological Survey (USGS) 7.5-minute topographic maps, "Lena, LA", "Boyce, LA", "Jericho, LA", and "Gardner, LA".

Site Location Map

Wetlands Assessment - Ash Basin No. 1
Mansfield, DeSoto Parish, Louisiana

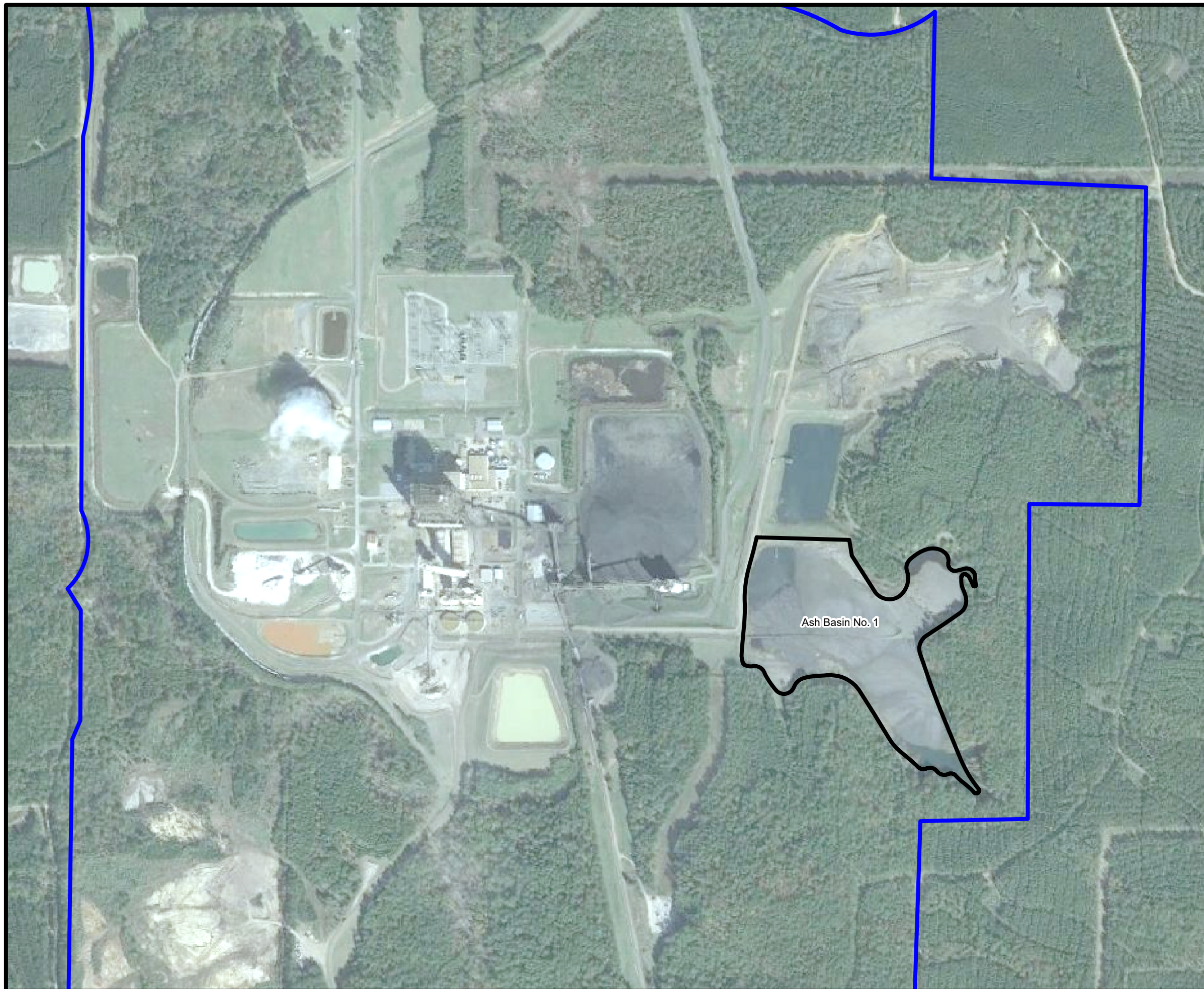
Cleco Power LLC
Dolet Hills Power Station



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| Checked By | LMH | 07/03/17 |
| Approved By | CVH | 07/03/17 |

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FIGURE 2
SITE MAP

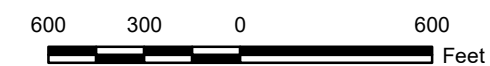


Legend

- Facility Boundary
- Ash Basin No. 1

Reference

Base map comprised of Google Earth aerial imagery from 11/06/12.



Site Map

Wetlands Assessment - Ash Basin No. 1
Mansfield, DeSoto Parish, Louisiana

Cleco Power LLC
Dolet Hills Power Station



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APPENDIX A
P.E. CERTIFICATION

**CLECO DOLET HILLS POWER STATION
ASH BASIN NO. 1
CCR WETLANDS ASSESSMENT**

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I have performed a wetlands assessment for Cleco's Dolet Hills Power Station Ash Basin No. 1 in accordance with the 40 CFR 257.61 CCR requirements. Based on the results from the wetlands assessment it appears that Ash Basin No. 1 was not constructed in wetlands under the jurisdiction of the USACE and that significant degradation of wetlands is not occurring. The NPDES permit requires compliance with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants. At no time during evaluation and reissuance of each NPDES permit has LDEQ or EPA documented or demonstrated that effluent exceedances or the discharge of toxics has occurred which has resulted in the violation of any applicable water quality criteria. Based on the habitat requirements for the species listed as threatened and/or endangered under the Endangered Species Act of 1973, the continued existence of listed species and/or their critical habitat is not jeopardized.

James C. Van Hoof

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Registration No.

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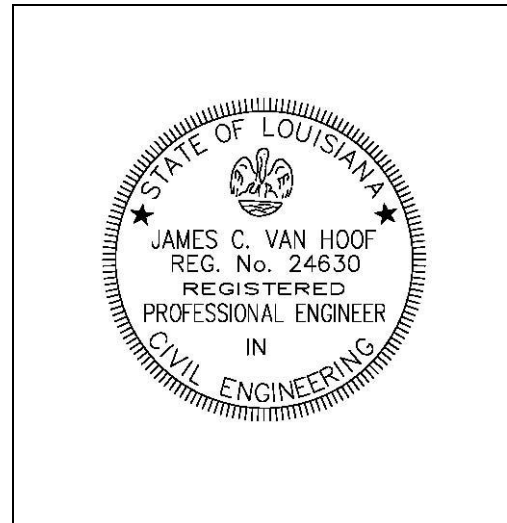
State

James C. Van Hoof, P.E.

Signature

9/25/2018

Date



(Seal)