

April 16, 2021

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3797

Re: Case No. 20-1679-EL-BGN - In the Matter of the Application of Pleasant Prairie Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Franklin County, Ohio.

Response to Third Data Request from Staff of the Ohio Power Siting Board

Dear Ms. Troupe:

Attached please find Pleasant Prairie Solar Energy LLC's ("Applicant") Response to the Third Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on April 16, 2021.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik

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The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 16th day of April, 2021.

/s/ Christine M.T. Pirik

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Administrative Law Judge:

Jay.agranoff@puco.ohio.gov

4825-2021-2710 v1 [39579-53]

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Pleasant Prairie)
Solar Energy LLC for a Certificate of Environmental)
Compatibility and Public Need to Construct a Solar-) Case No: 20-1679-EL-BGN
Powered Electric Generation Facility in Franklin)
County, Ohio.)

**PLEASANT PRAIRIE SOLAR ENERGY LLC 'S
RESPONSE TO THE THIRD DATA REQUEST
FROM THE STAFF OF THE OHIO POWER SITING BOARD**

On February 19, 2021, Pleasant Prairie Solar Energy LLC (“Applicant”) filed an application (“Application”) with the Ohio Power Siting Board (“OPSB”) proposing to construct a solar-powered electric generation facility in Franklin County, Ohio.

On April 15, 2021, the Staff of the OPSB (“OPSB Staff”) provided the Applicant with OPSB Staff’s Third Data Request. Now comes the Applicant providing the following response to the Third Data Request from the OPSB Staff.

1. **As provided in Ohio Adm.Code 4906-4-08(C)(1)(c) and (C)(4)(c)-(d) and based upon current land use trends, and any applicable land use plans, whether published or prepared by a consultant, is the project expected to inhibit or enhance future development of planned shopping centers, commercial/industrial development, and proposed residential subdivisions? Provide any supporting analysis and sources that were considered.**

Response: From the Applicant’s review of the Big Darby Accord Advisory Panel’s General Land Use Plan and the applicable Township Zoning Maps, which are provided as an Attachment 1 to this response, the Applicant has understood and discussed the desired future intended land uses for the Project Area with multiple stakeholders. The General Land Use Plan and current Township Zoning Map shows that well over half of the Project Area would take place on ‘rural’ zoned land that also has a Conservation Development Overlay to require 50% open space in such future developments.

In speaking with various area stakeholders such as Metro Park and Big Darby Advisory Accord Panel members and personnel, it is understood that the intent of this rural density

designation, along with the 50% open space requirement is meant to direct a future development to provide a buffer or transition from the Darby Creek Park area to the west.

The proposed use of the Project, with its minimal ground disturbance of little to no imperviousness (as noted in Application Exhibit R), incorporation of diverse native plantings with pollinators (as noted in Application Exhibit E), the use of aesthetically rural ‘Deer Fencing’, and the notion that this Project will exclude this area from other forms of denser development, the General Land Use Plan intent of a transition from the conservation nature area to the west to more population density to the East would be met.

2. **Referencing the Applicant’s Property Value Study (Exhibit P of the application), characterizations and comparisons are based upon land use types (ex: suburban, urban, agricultural). For the referenced study, was population density specifically addressed or weighed as part of the analysis?**

Response: Yes. Population density was reviewed and briefly spoken to on page 74 of the Applicant’s Property Value Study, Application Exhibit P. Population Density was reviewed as how it might correspond to study findings from a University of Rhode Island study published in September 2020. The Applicant’s consultant found that within Prairie Township, there is a population density level that is below the “rural” density threshold spoken to within the Rhode Island study in relation to property value findings of that study.

3. **Has the Applicant studied for any potential impacts as they are related to adjacent population centers with higher population densities (i.e. greater than the state average of 282 persons per square mile)? For example, expected increases or decreases in traffic volume and congestion, aesthetic impacts, or public safety concerns?**

Response: Yes. The Applicant has prepared the following project area and density specific studies: a Property Value Study (Application Exhibit P), a Traffic and Road Impact and Analysis Report (Application Exhibit M), a Sound Survey (Application Exhibit N), and a Viewshed Analysis (Application Exhibit J).

In addition to these site-specific studies that show the appropriateness of the proposed project, with regard to viewshed and as referenced in the responses to the ODR 2, the Applicant has heard from various stakeholders with regard to a concern over the project fencing originally proposed as chain link. The project team has reviewed an alternative ‘Deer Fencing’

configuration, and is committing to using this fence configuration around the solar array fields to alleviate perceived wildlife access and viewshed concerns.

4. **Does Applicant have any experience in an area with similar or greater population density than now exists in this project area? Please provide examples, if any, along with corresponding regulatory dockets, if available.**

Response: Yes. Based on 2016 US census block groups and GIS analysis, the Pleasant Prairie Solar project area has a rough population density of 279 people per square mile for both of the project Townships. The Applicant has experience developing another project, the Shoreham Solar Project in Suffolk County, New York which is now owned by Duke Energy and is operational. The population density for the project area of Shoreham is roughly 1,417 people per square mile.

5. **Provide a large-scale aerial map that depicts all inhabited residential dwellings adjacent to the project area that have a direct, unobstructed line-of-sight view to the project boundaries. Identify on the map which receptors are participating and non-participating, as well as any nearby roads and highways.**

Response: Attachment 2 to this response identifies that number of inhabited residential dwellings within 500 feet of the Project Area that have a potential line-of-sight view of the Project. As stated in Application, as part of the Vegetation Management Plan, Application Exhibit J, the Applicant plans to use module 3 (most dense vegetative buffer) vegetation screening around all adjacent landowners to create natural obstruction of view to the Project.

Respectfully submitted,

/s/ Christine M.T. Pirik

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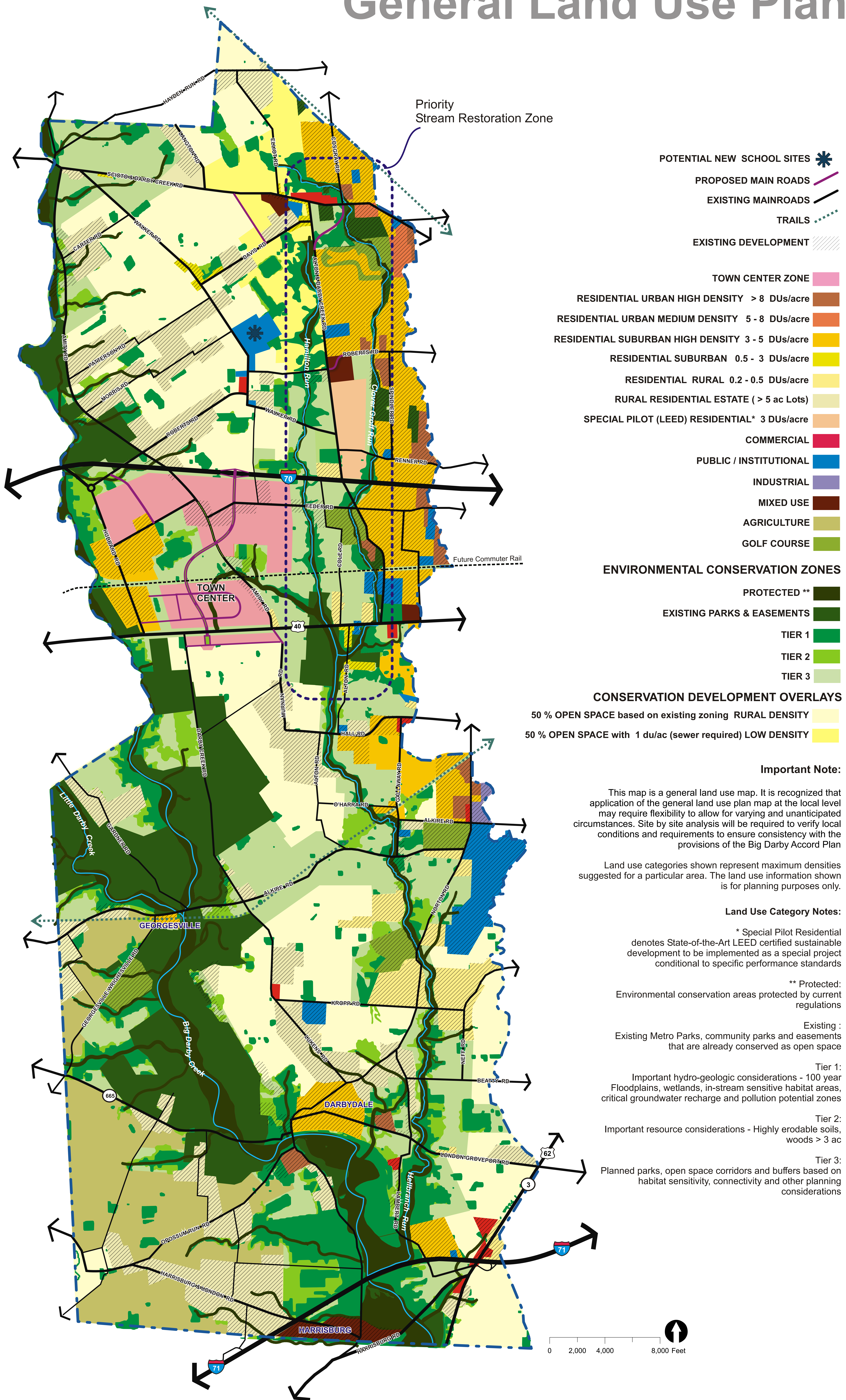
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Attorneys for Pleasant Prairie Solar Energy LLC

Attachment 1

General Land Use Plan and Prairie Township Zoning Districts

General Land Use Plan



BIG DARBY ACCORD

FRANKLIN COUNTY, OHIO

Prepared by:

EDAW

In Association with:

EMHT

MSI

Trans

Schottenstein

Johnson

Wright

The map displays the Big Darby Accord area, which is outlined in a thick green dashed line. Within this area, various zoning districts are color-coded: EU (blue), GB (red), LB (brown), M-1 (purple), M-2 (dark purple), MFR-12 (dark blue), OS (light green), PR-6 (teal), and Columbus (tan). Surrounding the accord area are other zoning districts: R-2 (yellow), R-4 (light yellow), R-6 (orange), R-8 (pink), RURAL (white), SCPD (yellow with diagonal lines), SER (green), and SO (light pink). Floodplains are also indicated: the Floodway (light blue with diagonal lines), the 100 year floodplain (light blue with a grid pattern), and the 500 year floodplain (light pink with a grid pattern). The map includes a north arrow in the top right corner and a scale bar in the bottom right corner, showing distances from 0 to 1 mile.

Zoning District

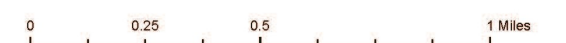
EU	R-2
GB	R-4
LB	R-6
M-1	R-8
M-2	RURAL
MFR-12	SCPD
OS	SER
PR-6	SO
Columbus	

Floodplain

- Floodway
- 100 year floodplain
- 500 year floodplain

Big Darby Accord

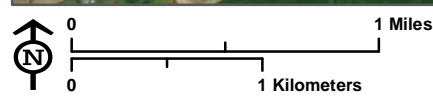
- Town Center
- Accord Planning Area

[illegible]

A map of the Washington, D.C. area showing the following counties: Washington, Shadon, Braddon, Plain, Perry, Brown, Norwich, Clinin, Miffle, Jefferson, Franklin, Trumb, Pleasant, Jackson, Hamilton, and Madison. Major roads are shown with route numbers: 45, 66, 301, 267, 29, 28, 202, 201, 200, 193, 192, 191, 190, 189, 188, 187, 186, 185, 184, 183, 182, 181, 180, 179, 178, 177, 176, 175, 174, 173, 172, 171, 170, 169, 168, 167, 166, 165, 164, 163, 162, 161, 160, 159, 158, 157, 156, 155, 154, 153, 152, 151, 150, 149, 148, 147, 146, 145, 144, 143, 142, 141, 140, 139, 138, 137, 136, 135, 134, 133, 132, 131, 130, 129, 128, 127, 126, 125, 124, 123, 122, 121, 120, 119, 118, 117, 116, 115, 114, 113, 112, 111, 110, 109, 108, 107, 106, 105, 104, 103, 102, 101, 100, 99, 98, 97, 96, 95, 94, 93, 92, 91, 90, 89, 88, 87, 86, 85, 84, 83, 82, 81, 80, 79, 78, 77, 76, 75, 74, 73, 72, 71, 70, 69, 68, 67, 66, 65, 64, 63, 62, 61, 60, 59, 58, 57, 56, 55, 54, 53, 52, 51, 50, 49, 48, 47, 46, 45, 44, 43, 42, 41, 40, 39, 38, 37, 36, 35, 34, 33, 32, 31, 30, 29, 28, 27, 26, 25, 24, 23, 22, 21, 20, 19, 18, 17, 16, 15, 14, 13, 12, 11, 10, 9, 8, 7, 6, 5, 4, 3, 2, 1. The map also shows the Potomac River and the Chesapeake Bay.

Attachment 2

Map Dwellings within 500 feet of Project Area



Project Area
 Adjacent Roadways (12)
 ● Non-Participating Adjacent Residences (152)

7.5' Quadrangles:
 Galloway, OH (1982)
 Harrisburg, OH (1976)

 PLSS: unsectioned

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Adjacent Roadways and Residences with Project Visibility

Visual Resource Assessment for the Pleasant Prairie Solar Energy Project Pleasant Prairie Solar Energy, LLC Franklin County, Ohio

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Case No(s). 20-1679-EL-BGN

Summary: Response to Third Data Request from Staff of the Ohio Power Siting Board
electronically filed by Christine M.T. Pirik on behalf of Pleasant Prairie Solar Energy LLC