

**From:** [Puco ContactOPSB](#)  
**To:** [Puco Docketing](#)  
**Subject:** public comment for Case Number 20-1405-EL-BGN  
**Date:** Monday, May 3, 2021 8:37:03 AM

---

**Subject:** Request For Application Narrative Investigation In Regards To Case Number 20-1405-EL-BGN

Hello,

My name is Stephanie Ross, my family and I live at 32342 State Route 31, West Mansfield, OH 43358. I am a home/landowner who is directly affected by the Union Solar/Acciona project. I have spent time dissecting Union Solars Application Narrative, conversing with union solar, and other public entities. Below I have discovered information that I believe is vital to review in the application process and should require remedies prior to certification approval.

1.) The solar company attempted to identify my home as a non impacted residence due to three sides of my home not being in direct sight of the solar arrays, collector lines, or construction entrances. Acciona states that because there are thin tree lines on all three sides of my property, I am not directly impacted and am not considered in direct LOS. This concludes the reason they did not identify my home in the most recent map that was provided to OPSB displaying the homes that are in direct LOS. Acciona also states this is the reason my family has not received any notification/information about this project. However, I would like to bring to your attention multiple Appendix submitted by Acciona, identifying my home as being directly impacted. This information shows importance for many reasons, as I am not the only resident experiencing misinformation by Acciona. This prompted me to further investigate and identify negligent data reporting for the convenience of Acciona's project.

A.) **Appendix Q - Structures near the project area:** Identifies my home as one of the 206 homes/structures **directly** impacted by the project. With a distance of 1425ft measured from my front door to Accionas fence line

B.) **Appendix O - Habitat Assessment:** A community meeting was held including Accionas business Manager Acciona on March 28th, for the purpose of discussing resident request and neighborhood agreements ( recorded meeting can be shared with OPSB at request) it was brought to the attention of Acciona two weeks prior to this meeting date that the community would like an updated map that had more viable labeling of roads and construction entrances as well as identification of the *37 acres of woodlands that Acciona states that they intend to clear*. This information is important to many residents including myself, we need to know how close construction entrances will be to my home. My family has a livestock farm and if this large number of woodlands is cleared then it takes away the natural screening of the solar project. In which case, if tree lines were removed, I would be even more considered to be within the LOS of the project. Acciona would not provide this map, however, it appears they did provide a more clearly labeled map to OPSB when prompted, as documented uploaded to the case record on 4/28. They also referred to my home within Appendix O for tree clearing. However, this appendix does not clearly identify what will be cleared It simply identifies existing woodlands.

Upon further review of Appendix O section 4.2 page 14 the clearing of 37 acres of woodland is inconsistent to what Acciona states there additional general avoidance measures will be.

C.) In the most recent case document published on 4/28 Acciona identified my home along with 382 additional homes that are impacted by the construction noise from Accionas project.

**\*\* The information above proves that Acciona was able at many different times to accurately identify hundreds of homes impacted by this project, yet strategically only identified certain homes during certain times that would benefited the current narrative and did not accurately notify all those truly impacted by the project.\*\***

2.) I would now like to bring to your attention to page 64 & 65 of the application narrative:

A.) " ***A desktop review of the ODNR groundwater well information (ODNR 2020) did not reveal any groundwater wells within the Project Area or a 1- mile buffer surrounding the Project Area.***"

1.) It is public information accessible on the ODNR's website to perform the same desktop review. I was able to identify hundreds of groundwater wells within the project area and 1 mile buffer of the project area. Therefore, I now question if Acciona even performed a desktop review due to the false data reporting.

2.) I consulted with James Rabb the Geology Program Supervisor with ODNR Division of Geological Survey because I noticed that the two wells located on my property were not documented within the ODNR desktop review. James informed me that any wells drilled prior to 1946 would not be documented. Therefore he went on to say that ODNR is aware that they only have about 65% of Ohio's wells documented. He then advised that there may be up to 35% more wells in any given area of Ohio than what is currently documented.

3.) James Rabb was then able to provide me with the hydrology report that was provided to Acciona clearly stating there are ***393 wells located within the project area ( 12-285ft deep) and up to 1 miles buffer of the project area.*** Many homes in this area (including mine) had wells drilled prior to 1946. This concludes this area has a high percentage undocumented wells containing potable water that could be impacted by the project.

4.) Upon further review of Appendix O I was able to find the hydrology report that James provided to me that has the information stating the number of wells within the project.

5.) Acciona restated to me recently in an email on 4/22 referencing page 64, they were not aware of any groundwater wells in the project area or 1 mile buffer of the project area and requested that neighbors please let Acciona know where their wells are located for site development purposes.

**\* Due to the following information above, it is clear that Acciona did not review the report from ODNR and did not perform the appropriate risk assessments. Confirmed by the large number of groundwater wells identified in the area. The dramatic difference between the number zero and over 400 is the reason to be requesting OPSB Investigators look further into this information and require a correct risk assessment be completed by Acciona prior to project certification.**

B.) " Further, no Surface Water Protection Areas or Surface Water Emergency Management Zones are located within the Project Area or the 1-mile buffer, and therefore, no impacts are proposed to these areas."

1.) Upon review of the US EPA DWMAPS the information can be found that brings attention to the above statement. This information shows that the entire project area is located

within a source water protection area (surface) and wellhead protection area (ground). This suggests that in reference to page 65(d) **Compliance with water source protection plan** Acciona has determined they do not need to comply. Acciona has stated in their application narrative, their O&M building will require well water supply.

( will this be a new well drilled or is this to be tapping into an already existing well?) After noting this information further investigation is needed by OPSB and Acciona.

\* Due to providing the following information above you will now be able to see the continuous inconsistency of information throughout pages 64 & 65 in multiple areas.

3.) I would like to turn your attention to Appendix U- Drainage Tile Assessment And Impact Report.

A.) **Figure 3 of Appendix U** shows a map of the project area, land owner provided field tile, and possible field tile. It is obvious by review that Acciona is not aware of the location of the majority of the field tile within the project area. Therefore how could Acciona possibly safely instal 111,000 poles by method of pile driving and not jeopardize the integrity of existing water tile. With Accionas current method of pile driving 7-10 feet they would not be able to see if they hit an existing drain tile. The ramifications of this could possibly not be seen until years down the road. At which time there would be no means for remedy due to solar fields already installed. Repair would mean possibly thousands of solar arrays being dug up to repair. Acciona needs to provide a thorough drain assessment with exact resolution of how to prevent this from occurring. For example, in the event an adjacent landowner had a field tile that ran from the construction zone into their property. Acciona has pile driven multiple poles in that area, broken multiple tiles that they were unable to see due to pile driving. This area is naturally prone to flooding, and the possibility of an adjacent landowners property experiencing water damage due to a damaged water tile within the project area caused by Acciona is extremely likely. I understand that Acciona will have a complaint line for this however that does not solve emergent irreparable damage to someone's home or land caused by the location of the solar array negligent construction practices.

**\* After further research I discovered that the only way Acciona would be able to identify unknown tile placement, identify damage, or need to repair would be to auger each hole intended for pole installation to a minimum of 5 feet. Due to lack of Ohio revised codes, zoning regulations, and accountability measures it would be best practice and best interest of the affected community if a onsite inspector housed in union soil and water paid for by Acciona was present on site for any augering or pile driving to confirm that tile is identified in that moment, rerouted, or repaired as needed. OPSB needs to investigate the lack of identification of water tile and request a revision of the plan to better identify, water drainage tile, supply appropriate oversight, and resolve any damage.**

**In conclusion, a request for further investigation for the above mentioned concerns is required by the OPSB.**

**Thank you,**  
Stephanie Ross

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

**Commission of Ohio Docketing Information System on**

**5/3/2021 9:57:02 AM**

**in**

**Case No(s). 20-1405-EL-BGN**

Summary: Public Comment Public Comment of Stephanie Ross, via website, electronically  
filed by Docketing Staff on behalf of Docketing