

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Juliet)
Energy Project, LLC for a Certificate of)
Environmental Compatibility and Public) Case No. 20-1760-EL-BGN
Need for a Solar Facility Located in Wood)
County, Ohio.)

**JULIET ENERGY PROJECT, LLC'S
RESPONSE TO OPSB STAFF'S SECOND DATA REQUEST**

1. The application states that the planned project fencing would be of a chain-link type construction. Other projects have stated that National Electrical Safety Code (Article 110) and the National Electric Code (Article 110.31 Enclosure of Electrical Installations) shows that utilization of a 'Deer Fence' fence is acceptable. The openings in such a woven metal fencing can be potentially bigger than traditional chain link and can also incorporate various ground tunnel attachments to reportedly aid in the small animal crossings like turtles, coyotes, etc. Further, other projects have proposed wooden rail-type fences. Is the Applicant willing to commit to incorporating an alternate fence that aids in resolving wildlife access/crossing and viewshed concerns for the project? If not, please explain, quantify and qualify any rationale for not employing fencing that is less aesthetically intrusive and more wildlife friendly.

ANSWER: The Applicant is willing to evaluate alternate types of fencing for the Project. Final fence design will be determined through an analysis of a number of factors, including cost, engineering considerations, and long term operations and maintenance considerations. The fence design will be provided to OPSB Staff with the final engineering drawings.

2. In addition to the visual planting modules map included in the application, 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.

ANSWER: See attached map. Direct, unobstructed line-of-sight views were determined through a combination of viewshed analysis, review of updated aerial imagery, and site visits.

3. Page 97 of the application states, "Drainage tiles were identified through consultations with participating landowners and the Fulton County Engineer." The project is in Wood County. Was the Wood County Engineer consulted?

ANSWER: The reference to the Fulton County Engineer on page 97 of the Application is an error. As mentioned in the Drain Tile Maintenance Plan (Exhibit Q), the Wood County Engineer was consulted.

4. 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.

ANSWER: Anticipated land use impacts from the Facility as they relate to land use planning goals as well as commercial, industrial, and residential development within five miles from the Project Area are discussed within the Socioeconomic Report. As noted in Part II, Section 4 of the Socioeconomic Report, the Facility is compatible with all land use planning goals as outlined by the 2017 Wood County Land Use Plan and the 2003 Henry County Comprehensive Plan. The Facility is located in a Rural Management Area designated by the 2017 Wood County Land Use Plan (p. 28). Rural Management Areas are intended to discourage subdivision of properties (e.g., residential subdivision) and encourage development that maintains land in agricultural production, natural habitat, or rural-based businesses or industries (p. 33). The Facility is also compatible with the housing market trends described in the Socioeconomic Report; it is not expected that the development of the Facility will have a significant impact on the regional housing market, and the Facility should not have a destabilizing effect on the current rental market. Finally, the Facility is expected to provide some supply-chain and additional economic benefits to the regional economy, as outlined in the Socioeconomic Report, but is not anticipated to have any other long-term impact on commercial or industrial development.

Additionally, the Applicant has engaged local leaders including the Mayor of the Village of Weston (Jeremy R. Schroeder), and the President of the Village Council (Shad Kendall). Those conversations included clear expressions of support for the Project.

5. 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?

ANSWER: The village of Weston is the only adjacent population center with a population density greater than the state average. Potential impacts to the village of Weston are discussed in the Application and associated exhibits.

The Route Evaluation Study (Exhibit B) outlines probable routes for construction traffic. The routes include the use of Taylor Street on the southern edge of the village, and Weston Road on the western edge of the village. None of the probable routes go through the center of the village. In addition, construction traffic is expected to be minimal. The only delays that would occur is where delivery vehicles may need to travel on roadways less than two lanes, similar to delays that occur when large agricultural machinery is on a public road. Construction traffic will be managed as outlined in a Traffic Control Plan that will be

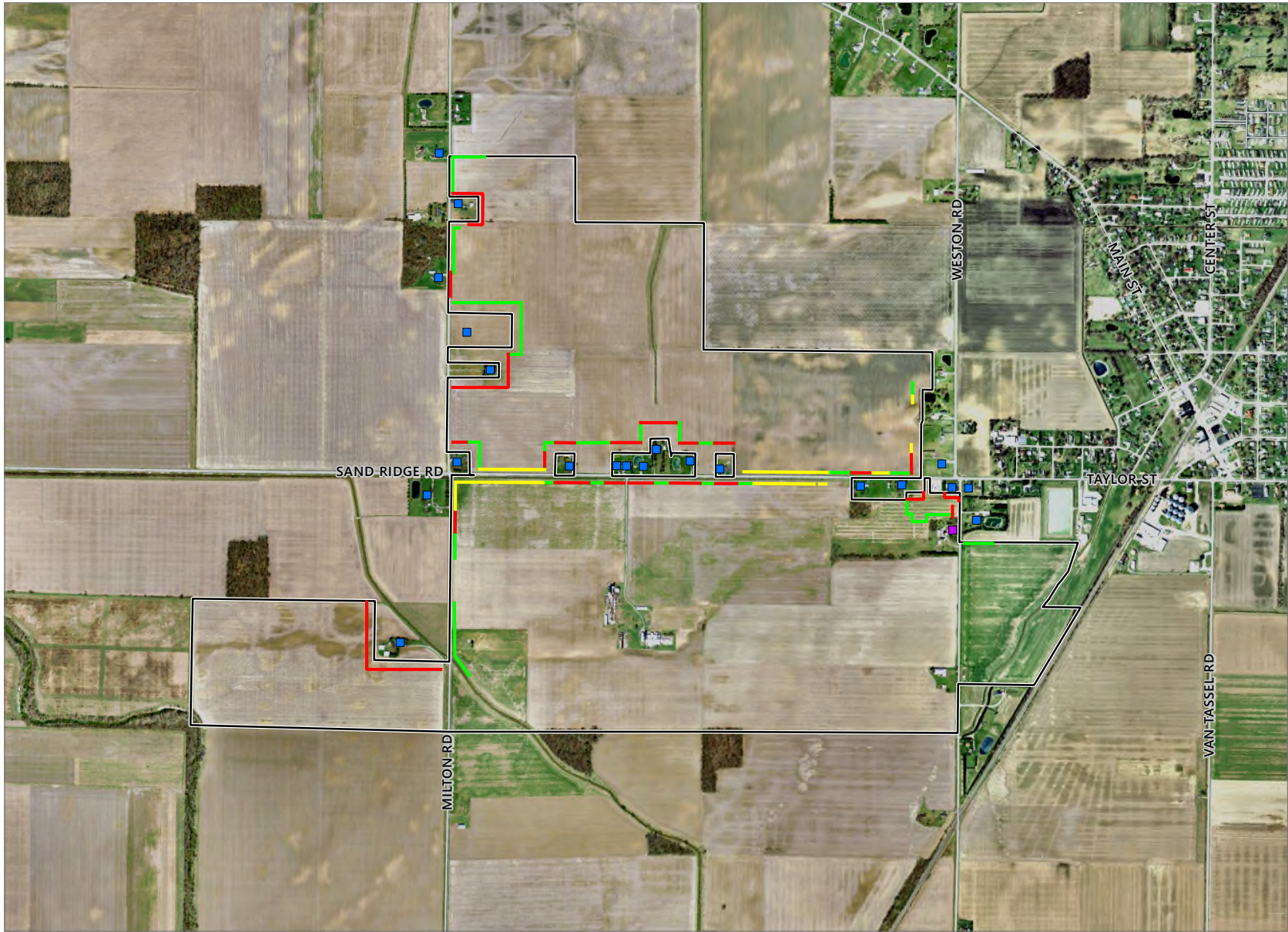
provided prior to construction. Facility-related traffic during operations would be limited to travel by operation and maintenance staff, estimated to be no more than six employees.

Aesthetic impacts to the village of Weston are addressed on page 28 of the Visual Resource Assessment (Exhibit P). Based on the viewshed analysis, visibility of the Facility will be limited to the southern and western perimeters of the village, and a small part of the northwestern corner. The Applicant has proposed landscape mitigation that would further block views of the Facility from those areas of the village. Due to the low profile of the Facility and intervening vegetation and structures that are typical of higher density areas, the Facility is not expected to be visible from the business district or more densely populated portions of the village.

As discussed in the Socioeconomic Report (Exhibit D), construction and operation of the Project will create a demand for new jobs. These workers may choose to patronize businesses within the village, which would provide an economic benefit. Most workers will be temporary, and are not expected to increase demands on local services.

Safety measures will be employed during construction and operation to prevent unauthorized access to the site. An Emergency Action Plan will be finalized based on coordination with Wood County Emergency Services, and will be submitted to the OPSB prior to Facility construction. On-site construction, operation, and maintenance personnel will be available to address any safety concerns. The Facility location adjacent to the village of Weston does not create any additional public safety concerns.

Juliet Solar Project - Landscape Mitigation and Adjacent Residences with a Direct, Unobstructed Line of Sight



Juliet Solar Project

Milton and Weston Townships
and the Village of Weston
Wood County, Ohio

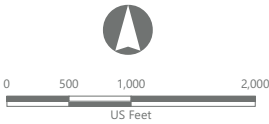
Case No. 20-1760-EL-BGN

Adjacent Residences with
Direct Line of Sight

- Participating
- Non-Participating

Landscape Mitigation

- Module 1
- Module 2
- Module 3
- Project Area



Prepared May 11, 2021
Basemap: OSIP Imagery

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/14/2021 1:29:27 PM

in

Case No(s). 20-1760-EL-BGN

Summary: Response of Juliet Energy Project, LLC to Staff's Second Set of Data Requests
electronically filed by Teresa Orahoud on behalf of Dylan F. Borchers