

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: public comment for 20-1679-EL-BGN
Date: Tuesday, July 20, 2021 8:03:52 AM
Attachments: [DCA Public Hearing Full Statement Pleasant Prairie 20210719.docx](#)
[Darby Creek Association Public Hearing Statement Summary 20210719.docx](#)

Attached is the written testimony I will provide this evening at the public hearing for Pleasant Prairie Solar, Case Number 20-1679-EL-BGN. (file name: Darby Creek Association Public Hearing Statement Summary 20210719.docx)

Also attached is an attachment, which you might refer to as an exhibit, to accompany the public hearing testimony I am providing on behalf of the Darby Creek Association. (file name: DCA Public Hearing Full Statement Pleasant Prairie 20210719.docx)

Thank you for your attention, and please contact me if there are any questions.

Sincerely,

Anthony Sasson
Darby Creek Association
8351 Patterson Road
Hilliard, Ohio 43026
614 519-9291



Darby Creek Association
Public Hearing Statement to the Ohio Power Siting Board
Regarding Pleasant Prairie Solar Energy Project, Case Number 20-1679-EL-BGN
Summary statement –
see full version provided to the OPSB by email
July 19, 2021
Copy to: contactOPSB@puco.ohio.gov

My name is Anthony Sasson. Along with Charlie Staudt, also in attendance, I am representing the Darby Creek Association (DCA). The DCA is a volunteer organization that has existed since 1972 with the purpose of protecting the National Scenic River Big Darby Creek and the outstanding natural environment in the watershed.

This proposed Pleasant Prairie Solar facility represents a significant threat to that environment and the quality of Battelle Darby Creek Metro Park, one of central Ohio's best attractions, with 1.3 million visits in 2020. While we like solar energy and abhor climate change, Ohio can do two things at once. We must protect - and improve - the local environment while reducing emissions, and we must also mitigate locally. We hope environmental advocates will agree. Also, we are not asking for a facility that is just better than agriculture. We are asking for a commitment to a "greener" solar facility that is appropriate and adequate for the setting. That effort should go significantly beyond compliance and recognize the public support for the Metro Parks and the 50-year+ effort that has gone into protecting and enhancing this outstanding natural environment. Battelle Darby Creek Metro Park is the revered center of that protection effort.

The proposed facility has a significant footprint immediately adjacent to Battelle Darby Metro Park or within sight of the park, including from busy roads such as US 40 and Darby Creek Drive leading to and near park entrances, and from the Darby Creek Greenway trail. Negative impacts from the proposed facility need to be reduced and this park must be protected well beyond compliance with minimum requirements.

It is DCA's position that this facility's application to the Ohio Power Siting Board and the "Recommended Conditions of Certificate" in the staff report of July 1, 2021, are not adequate to protect Battelle Darby Metro Park, such as, but not limited to, its aesthetics and visitor experience, wildlife and vegetation. We ask that the comments provided in the full version of DCA's statement dated today, and DCA's previous comments to the Ohio Power Siting Board, including those of July 1, and others, be fully addressed before certification is granted.

Importantly, we request that all of the issues in Metro Parks' Petition for Leave to Intervene be fully addressed to the satisfaction of Metro Parks.

A summary of specific comments includes:

Inadequate communication with Metro Parks and use of Metro Parks information

The application and staff report lack written documentation, to our knowledge, that the applicant has had substantive, significant communication and coordination with Metro Parks. This communication is greatly needed.

Aesthetic impacts and setbacks

We agree with Metro Parks' Petition that the "Proposed setbacks between the Project and the Park ... are too short to protect the Park."

Fencing

It is unclear what is meant in the OPSB staff report. To be clear, a wildlife-friendly or wildlife-permeable fence must have openings large enough near the ground to be passable by mammalian predators.

Inadequate attention to invasive species management

The Recommended Conditions of the staff report and application need much more attention to invasive species management, which threatens the integrity of adjacent habitats at Battelle Darby Metro Park.

Loss of Metro Parks' ability to conduct controlled burns

The application and staff report should address any requirements related to a solar facility that might threaten to limit or eliminate controlled burns at Battelle Darby Metro Park adjacent to the facility. A setback of several hundred feet between the property line and the solar panels might help alleviate such issues.

Loss of Darby Plains prairie species genotype through use of seedstock from elsewhere (outside of the Darby Plains)

If the proposed facility plants non-Darby Plains genotype vegetation, the Darby Plains prairie genotype will be lost in adjacent Battelle Darby Metro Park. Since at least 1976, Metro Parks has very carefully collected local prairie seed and managed prairie plantings with only local genotype seeds as source.

Need to include only planting Darby Plains species

The staff report and application imply that plant species not native to the Darby Plains could be planted. Instead, only species native to the Darby Plains should be planted and maintained.

Unidentified wetlands and “Anticipated Tree Clearing” of potential wetland areas

The application and report have not addressed certain wetlands that should be protected. The application proposes tree clearing for at least two wetland areas the National Wetland Inventory identified.

Wetland buffers

The proposed facility’s proposed wetland buffers are not adequate.

Inadequate consideration and accommodation of trail connection to conservation areas to the east, and for the Ohio to Erie/Camp Chase Trail (east from Battelle Darby Metro Park, near and along Alkire Road between Kropp Road and Galloway)

The proposed facility should ensure, to Metro Parks’ satisfaction, a trail connection to conservation land to the east.

Stream buffers

The project should maximize the width and vegetation quality of stream buffers, and avoid mowing.

Hydrology

The proposed facility could considerably improve hydrology related to stream health in the Big Darby Creek watershed by maximizing groundwater recharge.

Monitoring

The applicant should establish an adequate fund for continuous monitoring of biological conditions within the facility, on adjacent Metro Parks land, and other sites.

Summary

In summary, the siting of this facility in the Big Darby Creek watershed deserves greater protection of the local environment than proposed. We ask for conditions and a commitment to a “greener” solar facility that is appropriate for the setting, significantly beyond compliance and meets the concerns of the Metro Parks Petition for Leave to Intervene. Those conditions must protect Battelle Darby Creek Metro Park; DCA is not satisfied that they do so.



Darby Creek Association
Public Hearing Statement to the Ohio Power Siting Board
Regarding Pleasant Prairie Solar Energy Project, Case Number 20-1679-EL-BGN
Exhibit; Full version of statement - see summary statement delivered at July 19, 2021, public hearing
July 19, 2021

My name is Anthony Sasson. Along with Charlie Staudt, also in attendance, I am representing the Darby Creek Association (DCA). The DCA is a volunteer organization that has existed since 1972 with the purpose of protecting the National Scenic River Big Darby Creek and the outstanding natural environment in the watershed.

This proposed Pleasant Prairie Solar facility represents a significant threat to the quality of Battelle Darby Creek Metro Park, one of central Ohio's best attractions, with 1.3 million visits per year. We are asking for a commitment to a "greener" solar facility that is appropriate for the setting, significantly beyond compliance and recognizes the Metro Parks, local government and State of Ohio 50-year+ effort that has gone into protecting and enhancing this outstanding natural environment. Other major local and State efforts in the Big Darby Creek watershed have paralleled that of Metro Parks. The Big Darby is a State and National Scenic River, Exceptional Warmwater Habitat and home to 37 rare aquatic species.

The proposed Pleasant Prairie Solar facility has a significant portion of its footprint immediately adjacent to Battelle Darby Metro Park or within sight of the park, including from busy roads such as US 40 and Darby Creek Drive leading to and near park entrances and from the Darby Greenway trail, the main trail in the park. Battelle Darby Metro Park is a significant and special place for central Ohio and the State of Ohio and a popular public resource and destination, with 1.3 million visitors in 2020. Negative impacts from the proposed facility need to be reduced and this park must be protected well beyond compliance with minimum Ohio Power Siting Board requirements.

It is the position of the DCA that this facility's application to the Ohio Power Siting Board and the "Recommended Condition of Certificate" in the Ohio Power Siting Board staff report of July 1, 2021, are not adequate to protect Battelle Darby Metro Park, such as, but not limited to, its aesthetics, wildlife and Darby Plains vegetation. We ask that these issues below and in DCA's previous comments to the OPSB be fully addressed before certification is granted.

Importantly, we request that all of the issues in Metro Parks' Petition for Leave to Intervene be fully addressed to the satisfaction of Metro Parks.

Please see previous comments submitted to the Ohio Power Siting Board on July 1, 2021, via email. The Darby Creek Association's additional specific comments include the following:

Inadequate communication with Metro Parks and use of Metro Parks information

Based on the lack of written documentation in the application, to our knowledge, the applicant has had very little communication and coordination with Metro Parks, even though they are a neighbor with significant land bordering the proposed facility and provide a major public asset to over a million central Ohioans. Metro Parks supports the Franklin County and central Ohio park users and are excellent long-time stewards of this outstanding natural feature. The application lacks significant and relevant Metro Parks information about the local environment, even though Metro Parks has extensive important information regarding protecting the park's vegetation and wildlife, and obviously has a major stake in protecting the natural environment and aesthetic experience of these 1.3 million annual visitors. Please see the DCA comments to OPSB on this proposed facility of July 1, 2021, on Battelle Darby Metro Park's major importance to Ohio.

We note that Metro Parks filed a Petition for Leave to Intervene on May 2, 2021. We ask that these complaints be fully addressed to the satisfaction of Metro Parks. We do not believe that Metro Parks' concerns in this petition or DCA's concerns are adequately addressed in the application or July 1 OPSB staff report (for example, the lack of adequate setbacks to prevent aesthetic damage to the park, the limited evidence of attention to Darby Plains native plant species, and the risk of invasive species from the facility). This facility must go significantly beyond minimum OPSB requirements and the conditions in the staff report to protect this resource. Please ensure that the biological integrity and visitor experience of Battelle Darby Metro Park is fully protected.

Conditions required for this facility need to be adequately addressed to the full satisfaction of Metro Parks and agreed to, in detailed legally binding documents, by Metro Parks. To our knowledge, this has not been done to date.

DCA's position is that the applicant's consultation with Metro Parks has not been adequate to date. There is a lack of documented written evidence of consultation with Metro Parks in the application. Any conditions from OPSB must ensure that the applicant uses Metro Parks information and meets Metro Parks' concerns, with written approval by Metro Parks. This includes the concerns in the Petition for Leave to Intervene, such as that on Darby Plains vegetation, birds and other park wildlife. OPSB should require the applicant to engage in legally binding negotiations resulting in resolution satisfactory to Metro Parks.

An example of failure to adequately consult Metro Parks is Exhibit B, Site Characterization Report, Cardno, January 2021, section 3.6.5 Wildlife Observations, only reports "During field reconnaissance surveys, the following plant and animal species were observed within the Project Area (Table 3-6)." This table and other biological information in the application are far short of the number of potentially affected species recorded by Metro Parks across the property line from the proposed facility and highly likely to be affected by the project and within the project area. Other evidence of shortcomings includes a lack of reference to and adequate attention to Darby Plains plant species.

Aesthetic impacts and setbacks

Among other issues, Metro Parks' Petition for Leave to Intervene lists: "Proposed setbacks between the Project and the Park that are too short to protect the Park." We agree. DCA supports the Petition for Leave to Intervene of Metro Parks and other neighbors concerning the point of inadequate setback distances from the park and residences. These setbacks need to be significantly increased, especially because of the park setting they are in, given the 1.3 million visitors to this park in 2021.

The OPSB standard setbacks and the application's proposed setbacks from roads and parkland and those in the staff report are not adequate to avoid degradation of views and the overall experience of a natural setting for park visitors. The facility's panels are proposed at an inadequate setback distance and the panel arrays will be easily visible to park visitors, as well as the 12,000-15,000 daily travelers on US 40¹. Any setback should exceed the OPSB minimum be a minimum of several hundred feet from the park boundary and from US 40 and Darby Creek Drive, among other roads, and from trails.

In the Project Overview map of the facility dated April 2, 2021, significant lengths of the project area, including adjacent to the Park and Darby Greenway trail, appear to have no "vegetative screening." This would constitute significant negative aesthetic and recreational impacts and is not acceptable or appropriate for the site. This lack of screening also includes areas along US 40, Darby Creek Drive, Kuhlwein Road, Murnan Road and the Ohio to Erie/Camp Chase Trail (near Alkire Road).

Exhibit J, Viewshed Analysis, Aesthetic Resources Inventory, and Glare Analysis, Cardno, January 2021, Appendix D, Visually Sensitive Resource Analysis, page 78, of the application lists Battelle Darby Creek Metro Park as 2.13 miles from the "Nearest PV Array." Instead, a considerable distance (miles) of the proposed facility boundary is adjacent to the park. The Ohio to Erie Trail (Camp Chase Trail in this area) is not listed, although it does pass through the proposed solar facility near Alkire Road.

Fencing

It is unclear what is meant by OPSB staff report of July 1, 2021, or committed to by the applicant, specifically whether fencing will be permeable to mammalian predators. The applicant has referred to a "deer fence" and the staff report refers to "small mammal permeable" on page 31 of the staff report. Recommendation 15, Page 45, in the staff report states "small-wildlife permeable," but this does not ensure that the fence is permeable for predators as large as foxes or coyotes.

To be clear, a wildlife-friendly or wildlife permeable fence must be woven wire with openings large enough near the ground to be passable by mammalian predators, such as the adjacent parks' red foxes and coyotes.

Please see DCA's comments to OPSB of July 1, 2021, for more details on wildlife-permeable fence design.

We also encourage that a fence be no higher than six feet to limit the negative aesthetic impact.

Inadequate attention to invasive species management

¹ Estimate provided by Anthony Stevens, Anthony.Stevens@dot.ohio.gov, Ohio Department of Transportation, July 6, 2021.

The Recommended Conditions of the OPSB staff report and application need much more attention to invasive species management, particularly among the panels and in the perimeter and screening plantings. Invasive plant species will threaten the integrity of the prairie and wetland habitats at adjacent Battelle Darby Metro Park. Because controlled burns are not possible among the solar panels, but is a standard Metro Parks practice for control of invasives in prairie habitats, there appears to be a significant shortcoming for invasive species control, even though the applicant refers to Metro Parks' Vegetation Management Plan. This shortcoming constitutes a real threat to the integrity of the managed prairie and restored wetland at adjacent Battelle Darby Metro Park. Because the solar panels are a fundamentally different condition than the parkland, certain invasives species control measures, such as controlled burns, are unlikely to be an option within a solar facility. Therefore, invasive species control is problematic and we do not believe the issue is adequately addressed in the application. Reference to the Vegetation Management Plan that Metro Parks uses is not adequate because of the different situation near and among the solar panels.

Loss of Metro Parks' ability to conduct controlled burns

With many years of experience, Metro Parks conducts controlled burns within prairie areas in the parks annually, and regularly for each prairie section (example photo below). This includes areas in Battelle Darby Metro Park and immediately adjacent to the proposed facility perimeter and solar panels. Therefore, the application should address any requirements related to a solar facility that might threaten to limit or eliminate controlled burns at Battelle Darby Metro Park adjacent to the facility.

These controlled burns are essential for the health of the prairie. They help maintain the site as prairie, controlling nonnative and invasive species and encouraging plant reproduction, diversity and growth. The burns can only be conducted with Ohio EPA and ODNR approval. The burns require careful planning and preparation, and very specific meteorological conditions before and during implementation.

However, solar panels in close proximity to prairie areas in need of controlled burns could present a significant restraint for these burns. If the panels are subject to any issues related to controlled burns, this could severely restrict Metro Parks' ability to conduct them. Inability to conduct controlled burns would limit or eliminate Metro Parks' ability to maintain the prairie plant community, effectively degrading the prairie because of factors such as invasive species. This prairie is a fundamental feature of Battelle Darby Metro Park. Therefore, this issue must be addressed to the satisfaction of Metro Parks before the facility is certified. One option that might help is a significantly larger buffer (several hundred feet) between the parkland and the facility's fence and panels.

A setback of several hundred feet between the property line and the solar panels might help alleviate issues related to Metro Parks' ability to conduct controlled burns.

The OPSB Staff Report of Investigation does not address this issue.



Figure 1 Controlled burn of prairie at Prairie Oaks Metro Park, 11/3/2020

Loss of Darby Plains prairie plant species genotype through use of seedstock from elsewhere (outside of the Darby Plains)

The Recommended Conditions and application should ensure that the facility's perimeter plantings are Darby Plains native prairie species composed solely of local Darby Plains genotypes. Metro Parks has spent 45 years very carefully collecting seed locally and managing these prairie plantings with only these local genotype seeds as sources of their prairie plantings. If this facility plants non-Darby Plains genotype vegetation of the same species, this will contaminate the Battelle Darby Metro Parks Darby Plains genotype, and the Darby Plains genotype will be lost as a prairie plant community in adjacent Battelle Darby Metro Park.

Since at least 1976, Metro Parks has worked diligently to establish and expand prairie species plantings native to the Darby Plains using only species grown from carefully collected seed derived only from the Darby Plains. These seeds represent the native genotype from thousands of years of local reproduction within the Darby Plains and were not imported from outside of the Darby Plains area. Therefore, they represent genetic material unique to the Darby Plains. This is a highly unusual ecological condition that should be maintained and not degraded by this facility.

Please see the DCA comments to OPSB on this proposed facility of July 1, 2021, for more on this problem and shortcoming of the application:

<http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=9c74827b-dd3d-4909-aab9-35f12c67380a>.

The applicant should use Darby Plains genotype prairie vegetation seed in any vegetation plantings. (For prairie species, see <https://ohioplants.org/darby-plains-prairie-plants/>.)

Need to include only Darby Plains species in plantings

The July 1, 2021, staff report's Recommended Conditions and the application imply that plant species not native to the Darby Plains could be used in the plantings in the perimeter area and landscape screenings. For example, there are references to the "Selected Ohio Native Plants" list in Exhibit E, Landscape Vegetation Management, and Lighting Plan, HGS, LLC, January 2021, Appendix B/Ohio Native tree and Shrub Species List. Instead, see DCA's comments of July 1, 2021, to OPSB concerning the list of species that Metro Parks has compiled for Battelle Darby Metro Park and the list compiled for Darby Plains plant species (for prairie species, see <https://ohioplants.org/darby-plains-prairie-plants/>).

Species not from the above park and Darby Plains plant lists should not be planted at this facility; only species native to the Darby Plains should be planted and maintained. Staff report Condition 14 refers, for example, "vegetation screening designed to ... be in harmony with the existing vegetation ... in the area." This statement does not ensure that local plant species are used, and that the Darby Plains genotype is used for prairie species. Again, only Darby Plains species should be used. See DCA's July 1, 2021, comments for more on Darby Plains plant species.

Wetland buffers

The proposed facility's proposed wetland buffers are not adequate if they are based on the Ohio Rainwater and Land Development Manual, and therefore need expansion. Adequate hydrology needed for wetland protection needs to be addressed so that these wetlands survive and flourish. In addition, all wetlands need to be protected in place, with adequate buffers, exceeding those in the Ohio Rainwater and Land Development Manual (<https://epa.ohio.gov/dsw/storm/rainwater>).

While the application and staff report claim "no impacts are proposed to wetlands," the buffers proposed are not adequate. In addition, wetland hydrology is not adequately addressed.

Wetlands within and adjacent to the facility need to have greater wetland buffers than proposed in the application. The staff report of July 1, 2021, does not address wetland buffers. Wetland buffer distances recommended in Ohio EPA's Rainwater and Land Development Manual are based on arbitrary distances and are not scientifically-demonstrated distances needed for support of healthy wetland vegetation, wildlife or hydrology. Therefore, wetland buffers should be based on scientifically justified distances. Some relevant references which provide a more scientifically-based argument for wetland buffer distances are provided in "Appendix I, Wetland buffer recommendations."

Unidentified wetlands and "Anticipated Tree Clearing" of potential wetland areas

The "Anticipated Tree Clearing" on page 54 of Exhibit B, Site Characterization Report, Cardno, January 2021 appears to include at least two areas that might be wetlands. This Exhibit's Figure A-1 - Land Use also does not show these as wetlands. These appear to be glacial depressions, and likely are still there as treed areas because they are wetlands. They appear to be glacial depressions that are relatively deep, and deep enough to have persisted regardless of extensive agricultural drainage around them. These areas are marked in Exhibit B as "Anticipated Tree Clearing" areas in yellow with areas of 3.06

acres (39.940559, -83.212043; see the National Wetland Inventory (NWI) (Figure 2 below), PSS1C, 2.29 acre Freshwater Forested/Shrub Wetland at (<https://www.fws.gov/wetlands/data/mapper.html>) and 0.66 acres (39.940415 -83.206091 (PFO1C, 0.70 acre Freshwater Forested/Shrub Wetland at <https://www.fws.gov/wetlands/data/mapper.html>)). They are west and north, respectively of wetland W012, south of the Darby Dan airstrip and east of Darby Creek Drive. This is not a complete list of potential wetlands that are not identified in the application. Please see the Darby Creek Association's comments of April 7, 2021, for more on wetland identification.

If these are wetlands, clearing of these trees, and failure to protect such wetlands and buffers is not acceptable. All isolated wetlands in Ohio are protected under ORC 6111. Within the Big Darby Accord area, all wetlands are subject to protection. To our knowledge, all wetlands in the Accord area have been protected in place to date. Assuming these are wetlands, they need to be delineated and protected, if that has not been done through another part of the application.

Maps for the locations of the solar panels, such as in Figure 03-1, Project Area Map, Invenergy, January 12, 2021, and Figure 03-2, Project Area Aerial Map, Invenergy, January 11, 2021,² appear to show the solar panels would be built over these wetlands. Does that mean these NWI wetlands are proposed to be filled or otherwise eliminated? Because they are wetlands and unusual glacial features, they should remain in place, with adequate buffers.

A native vegetation corridor would provide an excellent link from these wetlands to the Metro Parks land near the Darby Greenway trail east of Darby Creek Drive to the south. This could serve as a buffer as visitors approach the park entrance along Darby Creek Drive.

Further, these potential wetlands are not marked on Wetland and Waterbody Maps (Sheet 9 of 34) or Wetland and Waterbody Maps (Sheet 10 of 34), Exhibit C, Wetland and Waterbody Delineation Report, Cardno, January 2021. The National Wetland Inventory identifies more than this in the northern portion of the study area, within ~0.2 miles south of the Darby Dan Farm airstrip and within ~0.7 miles of Darby Creek Drive. This area has about 18 acres identified in the National Wetlands Inventory (<https://www.fws.gov/wetlands/data/mapper.html>).

[Exhibit B](#): Application - 4 of 25 (Exhibit B - Site Characterization Report) electronically filed by Christine M.T. Pirik on behalf of Pleasant Prairie Solar Energy LLC

[Exhibit C](#): Application - 5 of 25 (Exhibit C - Wetland and Waterbody Delineation Report) electronically filed by Christine M.T. Pirik on behalf of Pleasant Prairie Solar Energy LLC.

² <http://dis.puc.state.oh.us/TiffToPdf/A1001001A21B19B13946F02570.pdf> A1001001A21B19B13946F02570
Application Part 2; Project Area Maps



Figure 2 Some of the National Wetlands Inventory-identified wetlands in the project area

Natural corridor connection from facility wetland to Metro Parks land

The DCA strongly encourages a natural corridor connection from the facility's wetlands to Metro Parks land near the Darby Greenway trail east of Darby Creek Drive. This could be incorporated into setbacks from Metro Parks land and Darby Creek Drive. This could provide an excellent natural corridor link and migration corridor for wetland animals such as amphibians, enhancing the facility's wildlife protection and groundwater recharge. This corridor should be protected by a conservation easement held by a conservation organization such as Franklin Soil and Water Conservation District or Ohio EPA.

Inadequate consideration and accommodation of trail connection to conservation areas to the east, and for the Ohio to Erie/Camp Chase Trail (east from Battelle Darby Metro Park, near and along Alkire Road between Kropp Road and Galloway)

About four hundred acres of conservation land (e.g., Franklin SWCD's Hellbranch Meadows land) suitable for trails and other recreation are found to the east side of the proposed facility. Discussions

among conservation and recreation organizations such as Metro Parks have emphasized this potential trail connection in the past. However, the facility might preclude the establishment of a recreational trail connecting Battelle Darby Metro Park and Hellbranch Meadows (Franklin Soil and Water Conservation District land). A trail route suitable to Metro Parks and the Franklin SWCD should be established.

The application and staff report do not address the Ohio to Erie/Camp Chase Trail, which runs through the project area and is managed in this area by Metro Parks. The panels would be readily visible from the Ohio to Erie Trail, which is the major recreational trail running from Cincinnati to Cleveland and passing through Battelle Darby Metro Park and east near and along Alkire Road, and near that road's intersection with Johnson Road. Based on the Invenergy Project Overview map of April 2 2021, it appears that there is no vegetative screening or significant setback (greater than the 100 foot minimum) near this trail on its north or south side. The application's Exhibit J, Viewshed Analysis, Aesthetic Resources Inventory, and Glare Analysis, Cardno, January 2021, does not mention this trail.

Monitoring

Remarkably little information is available on the impacts of solar facilities on the nearby environment, especially in Ohio, and none in the ecologically sensitive Big Darby Creek watershed. Therefore, we recommend that the applicant establish an adequate fund for continued monitoring of biological conditions within the facility and on adjacent Metro Parks land, and other sites as deemed appropriate by Metro Parks and other conservation organizations such as the Ohio Department of Natural Resources (including the Scenic Rivers Program), Ohio EPA and the Franklin Soil and Water Conservation District. We recommend that Metro Parks have full management responsibility for this fund.

Topics that might be covered could include, but not be limited to, biological conditions and trends in wildlife and vegetation, such as, but not limited to, the insect, bird, amphibian, reptile, mammal, fish, mussel and macroinvertebrate species and communities and native and alien plant species and communities. So that a baseline can be established, such monitoring should start immediately if this facility is approved and before construction commences. Stream and wetland monitoring must at least meet Ohio EPA standard procedures for credible data (<https://www.epa.state.oh.us/dsw/credibledata/index>). The data would be maintained in an organized database available to the public. The monitoring should continue until Metro Parks agrees that it may cease.

Other suggested mitigation for the impacts to Battelle Darby Metro Park include contributions for conservation land acquisition.

Stream buffers

The project should maximize the width and vegetation quality of stream buffers, and avoid mowing.

While stream buffers will need to meet the Big Darby Creek Watershed general permit for stormwater, the application refers to a condition for stream buffers that might not meet those requirements. Trees and shrubs are the natural condition along local streams including in the Big Darby Creek watershed, and any stream buffer must allow shrubs and trees to constitute the riparian area. The riparian area

should be Ohio native trees and shrubs (and other appropriate native vegetation) and not be mowed or otherwise disturbed other than to control invasive species.

We encourage this facility to significantly exceed the minimum distance for stream setbacks in the Big Darby Creek Watershed general permit for stormwater.

The stream labelled as “S001 (I)” (39.922982, -83.190695) on Wetland and Waterbody Maps (Sheet 17 of 34), Exhibit C, Wetland and Waterbody Delineation Report, Cardno, January 2021, must at least meet the riparian setback requirements of the Big Darby Creek Watershed General Permit for stormwater. We strongly encourage the applicant to do better and maximize the width and quality (especially trees along streams) of stream buffers.

Hamilton Run (39.9581 -83.1840) is the other stream documented in the Exhibit C report. This is in the area of the proposed transmission line to the Cole Road substation.

DCA has commented twice on the stream restoration needed not just on land managed by Invenergy or partners, but also on land owned by Prairie Township along Hamilton Run and McCoy Ditch upstream and downstream of US 40. DCA has provided two sets of related comments that were provided to the OPSB:

- June 15, 2021, to Josh Hreha, Invenergy:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21F16B13514D02040.pdf>
- May 28, 2021, to Rob Peters, Prairie Township:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21F01B10205D00047.pdf>

Please see these comments for specifics on the need to avoid limiting the restoration potential of these streams on any section of these stream, including from the upper reaches at the railroad tracks to south of US 40 where the Prairie Township parcel joins the Franklin SWCD parcel (Hellbranch Meadows).

These comments address the need to adequately plan for and design stream restoration along Hamilton Run and McCoy Ditch, and especially for the transmission lines associated with Pleasant Prairie Solar to avoid limiting the potential for the highest quality stream restoration. While we recognize the transmission line is a separate application, it is imperative that this project be designed with Prairie Township, the Franklin County Soil and Water Conservation District, Ohio EPA and others, as appropriate, in order to avoid limiting the restoration potential of this stream, including the riparian corridor and the growth of native trees and shrubs along the stream. This is essential to maximize the stream habitat scores, and consequently stream quality scores, resulting from any stream restoration projects.

Hydrology

While the application refers to hydrology and associated issues such as drainage tile underlying the site and encountered during construction, this facility could considerably improve hydrology related to stream health in the Big Darby Creek watershed by maximizing groundwater recharge and far exceeding the minimum requirements of the Big Darby Creek watershed stormwater permit (Appendix A of Permit OHC00005). Tile drainage constitutes sub-surface drainage, effectively hydromodification, or flow

alteration, resulting in negative disruption to the natural hydrology of a stream system. Combined with surface runoff, this is one of the most common causes of aquatic life impairment in Ohio³ and in the Hellbranch Run and Big Darby Creek watersheds.⁴ This is a potential cause of degradation of Hellbranch Run and tributaries, which includes the area of this facility.

Protecting and improving stream hydrology, including encouraging and restoring much more of the site's infiltration to groundwater, would help mitigate climate change and restore downstream stream quality. This facility and any other in the Big Darby Creek watershed, need to significantly exceed the required Ohio EPA stormwater permit to help improve local stream health. Meeting the minimum requirements of the stormwater permit only maintains the status quo of altered hydrology. Attention to this hydrology that maximizes groundwater recharge and enhancement and preservation of the adjacent parkland's natural conditions. Encourage groundwater recharge to the maximum extent possible and avoid lowering the water table.

Summary

In summary, the siting of this facility in the Big Darby Creek watershed deserves greater protection of the local environment than proposed. We ask for staff report conditions and a commitment to a "greener" solar facility that is appropriate for the setting, significantly beyond compliance and meets the concerns of the Metro Parks Petition for Leave to Intervene. They must protect and enhance this outstanding adjacent natural environment that is Battelle Darby Metro Park; DCA is not satisfied that they do so.

³ Ohio EPA. 2020. 2020 Integrated Water Quality Monitoring and Assessment Report, page A-10.

⁴ Ohio EPA. 2018. Biological and Water Quality Study of the Big Darby Creek Watershed 2014. Logan, Champaign, Union, Madison, Franklin, and Pickaway Counties, OH, page 140: "Due to storm water runoff (suburban and agricultural), Hellbranch Run hydrology has become flashy with resultant erosion, increasing siltation, and embedding substrates, all to the detriment of mussels (Ohio EPA 2004; Haag 2012)."

Appendix I

Wetland buffer recommendations

Submitted by the Darby Creek Association

7/16/2021

Purpose

This document supplements comments of the Darby Creek Association to the Ohio Power Siting Board concerning wetland buffers for solar facilities applying for certification to the Board. This document offers some of the buffers widths recommended and/or used by others as examples for comparison.

Recommendations

- All wetlands on the facility's site should remain in place (i.e., not be mitigated off-site).
- The facility should include wetland buffers, which, at a minimum, exceed the buffer distances and meet adequate hydrology protection as stated in the "Ohio Rainwater and Land Development Manual" (<https://epa.ohio.gov/dsw/storm/rainwater>); see references below.
- At a minimum, these buffers should exceed those in Ohio's Rainwater and Land Development Manual and ensure that a minimum level of biological, physical, and/or chemical integrity is maintained to any preserved wetland under the post-construction condition. The buffers in the manual are^{5,6}:
 - Category 1 wetlands: minimum 25 feet
 - Category 2 wetlands: minimum 75 feet
 - Category 3 wetlands: minimum 120 feet
- Each buffer should be protected in its natural state, with native species predominant and with minimal disturbance (such as removal of invasive, nonnative species).
- Each buffer shall have its boundaries permanently recorded and demarcated with appropriate signage. Each wetland and buffer shall be protected by a legal mechanism, such as coverage by a protective covenant⁷ held by the Franklin County Soil and Water Conservation District, Ohio

⁵ A buffer can help with maintaining some hydrology, but it would likely be a small part of a wetland's overall drainage area. These buffers do not necessarily ensure that hydrology is maintained, which is a separate issue from buffer establishment.

⁶ Also see the buffers included in the Ohio Rapid Assessment Method (ORAM). Note that the buffer widths in this paragraph are less than that provided in ORAM.

⁷ An example of a protective covenant from Ohio EPA is at "401 Environmental Covenant Template". <https://www.epa.ohio.gov/Portals/35/401/401-Environmental-Covenant-Template-FILLABLE.docx> (Accessed December 2020).

EPA or other government conservation entity, as conservation land to protect these natural resources in perpetuity.

- For all preserved wetlands provide documentation of how the hydrology will be maintained (water budget) and how that hydrology will not be negatively impacted by the proposed project.

References to wetland buffers in the Big Darby Accord Master Plan

While we recognize that the Big Darby Accord Master Plan does not apply in this case, the proposed solar facility is within the boundaries of the Big Darby Accord Watershed Master Plan (<https://bigdarbyaccord.org/the-plan> , 2006). These excerpts from the Plan are provided for reference. This plan has the following content relevant to wetland buffers:

4.0 Land Use and Development Policies

Page 4-2

“Key Recommendations”

“Protect the integrity of wetlands and diminish their loss within the planning area.”

Page 4-6:

Site development design should ensure that adequate hydrology is maintained to any preserved wetland under the post-construction condition; however, the wetland cannot be used as part of the stormwater management scheme for a development. Preserved wetlands should be adequately delineated in the field and protected from stormwater runoff during construction.

5.0 Implementation

Page 5-6:

“For wetlands to be preserved within the site, delineate the buffer area in accordance with the criteria within ODNR’s Rainwater and Land Development (draft) document.”

“For wetlands proposed to be filled, provide information regarding mitigation alternatives to be considered during the antidegradation process.”

Defining a “wetland buffer”

Several relevant Ohio sources define a wetland buffer. Ohio Administrative Code 3745-1-50 “Wetland definitions and availability of documents” provides the following definition of an upland buffer, pertaining to wetlands:

“(TT) “Upland buffer” means land surrounding the jurisdictional edge of a wetland that consists of upland prairie, old field, shrub, or forest vegetation that is maintained in a natural state through passive or active management. This does not include lawns, mowed roadsides, fields where crops are grown or animals pastured, and other similar land uses.”

The Ohio Rapid Assessment Method manual (Mack 2001), Page 39, states:

“For the purposes of this question, “buffer” means non-anthropogenic landscape features which have the capability of protecting the biological, physical, and/or chemical integrity of the

wetland from effects of human activity. Typically, a buffer could be forested or shrubby margin, prairie, streams or lakes, old fields, and in certain instances more managed landscapes like meadows or hay fields. Intensive human land uses should not be counted as buffers. These include active agricultural row cropping, fenced or unfenced pastures, paved areas, housing developments, golf courses, mowed or highly managed parkland, mining or construction sites, etc. A comprehensive list is not proposed in this manual. The key concept is whether the buffer area, whatever it is, functions to protect the wetland from degradation.”

This excerpt from OAC 3745-1-54 (F)(7)(c) is applicable for the desired state of the wetland buffer:

“The upland buffer consists of native vegetation which is not maintained through mowing, application of herbicide or other means which would result in deleterious effects to either the upland buffer or the adjacent wetland.”

The Ohio Interagency Review Team for wetland banking in its Guidelines for Wetland Mitigation Banking and In-Lieu Fee Programs in Ohio v2.0 defines buffers as:

“An upland, wetland, and/or riparian area that protects and/or enhances aquatic resource functions associated with wetlands, rivers, streams, lakes, marine, and estuarine systems from disturbances associated with adjacent land uses.” (Page 4)

And adds:

“Sites with adjacent land uses that will adversely impact mitigation success are discouraged unless there are means to offset these impacts. Buffers of adequate size (i.e. minimum 100 feet, measured from the boundaries of existing or proposed wetlands) and composition should be included to reduce impacts of adjacent land uses.” (Page 16)

A wetland buffer also includes the area necessary to “ensure that adequate hydrology is maintained to any preserved wetland under the post-construction condition” (Big Darby Accord Master Plan, 2006, 4.0 Land Use and Development Policies, Page 4-6). Typically, such determinations are site-specific and are based on factors such as topography/slopes, soil types and determining surface and groundwater sources of water reaching the wetland. For more information, see the ORAM manual and U.S. EPA (2008). The quality of a wetland without adequate hydrology is degraded and is not a protected wetland:

“Hydrology is probably the single most important determinant for the establishment and maintenance of specific types of wetlands and wetland processes.” (Mitsch and Gosselink, 1996, p.55).

In order to prevent wetland degradation after wetland delineation and buffer establishment, each buffer needs to have its boundaries permanently recorded and marked. Each wetland and buffer needs to be protected by a legal mechanism, such as coverage by a protective covenant held by Franklin County Soil and Water Conservation District, Ohio EPA or other government conservation entity, as protected conservation land to protect these natural resources in perpetuity.

References

Several sources were the key documents consulted for these recommendations. References used and listed in “Attachments include, but are not limited to:

- Big Darby Accord Watershed Master Plan
- Rainwater and Land Development: Ohio’s Standards for Stormwater Management Land Development and Urban Stream Protection
- Ohio EPA: Storm Water Discharges from Small and Large Construction Activities - General Permit
- Ohio Administrative Code 3745-1-54
- Ohio Rapid Assessment Method manual
- Franklin County Zoning Resolution

Omissions or shortcomings

These recommendations do not consider all other sources covering wetland buffer widths, their protection and hydrology. These sources are extensive. This document is limited to the buffer reference in the 2006 Accord Plan. These recommendations do not address, or do not fully address, such points as:

1. If buffer averaging is allowed (allowing an average wetland buffer width in place of a minimum – see the ORAM as an example):
2. The set of factors to include for when “adequate hydrology is maintained” (as stated in the Accord Plan on page 4-6); and
3. The adequacy of the buffer widths included in the Rainwater and Land Development Manual.
4. The specific legal instrument to protect wetlands and their buffers, e.g., Ohio Environmental Covenant template (See <https://www.epa.ohio.gov/Portals/35/401/401-Environmental-Covenant-Template-FILLABLE.docx>)

Attachments

Attachment 1

References

Big Darby Accord Watershed Master Plan

<https://bigdarbyaccord.org/the-plan> (Accessed December 2020)

Castelle, A. J., et al. 1994. Wetland and Stream Buffer Size Requirements – A Review. *Journal of Environmental Quality*, 23:878-882 pp

Franklin County Zoning Resolution

https://development.franklincountyohio.gov/EDP-website/media/Documents/Planning_Zoning/Zoning/zoning-code.pdf (Accessed December 2020)

Mack, John J. 2001. Ohio Rapid Assessment Method for Wetlands v. 5.0, User's Manual and Scoring Forms. Ohio EPA Technical Report WET/2001-1. Ohio Environmental Protection Agency, Division of Surface Water, 401/Wetland Ecology Unit, Columbus, Ohio.

<https://epa.ohio.gov/Portals/35/401/ORAM%20Manual%205.0.pdf> (Accessed December 2020)

Mitsch, W.J. and J.G. Gosselink. 1986. *Wetlands*, 2nd Edition. Van Nostrand Reinhold Company, New York, New York.

Ohio EPA. 2014. Rainwater and Land Development: Ohio's Standards for Stormwater Management Land Development and Urban Stream Protection (Accessed December 2020)

Specifically, see:

Chapter 2: Post-Construction Storm Water Practices (Adapted for 4/23/18 CGP Update)

https://epa.ohio.gov/Portals/35/storm/technical_assistance/Ch2_Adapted%20for%20CGP%20changes.pdf

Ohio Administrative Code 3745-1-54 (Includes definitions of wetland categories) (Accessed December 2020)

Ohio Administrative Code 3745-1-54 Wetland antidegradation

https://epa.ohio.gov/Portals/35/rules/01-54_july18.pdf

Includes (excerpts):

(B) Wetland antidegradation requirements.

(C) Wetland categories. (*i.e., Categories 1, 2 and 3*)

(D) Wetland avoidance, minimization, and compensatory mitigation.

Ohio EPA: Storm Water Discharges from Small and Large Construction Activities - General Permit

https://epa.ohio.gov/dsw/permits/GP_ConstructionSiteStormWater (Accessed December 2020)

Specifically, see Appendix A Big Darby Creek Watershed

Ohio EPA. 2014. Rainwater and Land Development: Ohio's Standards for Stormwater Management Land Development and Urban Stream Protection <https://epa.ohio.gov/dsw/storm/rainwater> (Accessed December 2020)

Specifically, see:

Chapter 2: Post-Construction Storm Water Practices (Adapted for 4/23/18 CGP Update)

https://epa.ohio.gov/Portals/35/storm/technical_assistance/Ch2_Adapted%20for%20CGP%20changes.pdf

Ohio Interagency Review Team. 2016. Guidelines for Stream Mitigation Banking and In-Lieu Fee Programs in Ohio Version 1.1 March 2016. 43 pp.

U.S. EPA. 2008. Methods for Evaluating Wetland Condition #20 Wetland Hydrology. Office of Water/Office of Science and Technology, Washington, DC 20460. EPA-822-R-08-024
https://www.epa.gov/sites/production/files/documents/wetlands_20hydrology.pdf (Accessed December 2020)

Additional wetland buffer references:

Chagrin River Watershed Partners, Inc. 2013. Summary of Riparian and Wetland Setback Regulations in Ohio. http://crwp.org/files/Riparian_Wetland_Regulation_summary_November2013.pdf (Accessed December 2020)

Environmental Law Institute. 2008. Planner's Guide to Wetland Buffers for Local Governments. <https://www.eli.org/research-report/planners-guide-wetland-buffers-local-governments> (Accessed December 2020)

Hruby, T. 2013. Update on Wetland Buffers: The State of the Science, Final Report, October 2013. Washington State Department of Ecology Publication #13-06-11.
<https://apps.ecology.wa.gov/publications/SummaryPages/1306011.html> (Accessed December 2020)

Semlitsch, R.D. and J.R. Bodie. 2003. Biological Criteria for Buffer Zones around Wetlands and Riparian Habitats for Amphibians and Reptiles. Conservation Biology 17(5): 1219-1228.
https://www.jstor.org/stable/3588947?seq=1#page_scan_tab_contents (Accessed December 2020)

Below is the Semlitsch and Bodie reference above, and often cited regarding wetland buffer zones. Note their distances for "core terrestrial habitat" surrounding a wetland, necessary to support the reptiles and amphibians, "ranged from 159 to 290 m for amphibians and from 127 to 289 m for reptiles from the edge of the aquatic site."

Abstract:

Terrestrial habitats surrounding wetlands are critical to the management of natural resources. Although the protection of water resources from human activities such as agriculture, silviculture, and urban development is obvious, it is also apparent that terrestrial areas surrounding wetlands are core habitats for many semiaquatic species that depend on mesic ecotones to complete their life cycle. For purposes of conservation and management, it is important to define core habitats used by local breeding populations surrounding wetlands. Our objective was to provide an estimate of the biologically relevant size of core habitats surrounding wetlands for amphibians and reptiles. We summarize data from the literature on

the use of terrestrial habitats by amphibians and reptiles associated with wetlands (19 frog and 13 salamander species representing 1363 individuals; 5 snake and 28 turtle species representing more than 2245 individuals). Core terrestrial habitat ranged from 159 to 290 m for amphibians and from 127 to 289 m for reptiles from the edge of the aquatic site. Data from these studies also indicated the importance of terrestrial habitats for feeding, overwintering, and nesting, and, thus, the biological interdependence between aquatic and terrestrial habitats that is essential for the persistence of populations. The minimum and maximum values for core habitats, depending on the level of protection needed, can be used to set biologically meaningful buffers for wetland and riparian habitats. These results indicate that large areas of terrestrial habitat surrounding wetlands are critical for maintaining biodiversity.

Attachment 2

Background: Importance of wetland buffers

Source for the following quote: Nieber, J.L., C. Arika, C. Lenhart, M. Titov and K. Brooks. 2011. Evaluation of Buffer Width on Hydrologic Function, Water Quality, and Ecological Integrity of Wetlands: Final Report. Minnesota Department of Transportation, St. Paul, Minnesota. 182 pp. <http://www.dot.state.mn.us/research/documents/2011-06.pdf> Accessed 6/3/2019.

“Human activities including agricultural cultivation, forest harvesting, land development for residential housing, and development for manufacturing and industrial activities can impair the quality of water entering the wetland, thereby detrimentally affecting the natural ecological functions of the wetlands. This can lead to degradation of biota health and biodiversity within the wetland, reduced water quality in the wetland, and increased release of water quality degrading chemicals to receiving waters. Under natural conditions wetlands develop buffer areas that provide some protection from the natural processes occurring on adjacent areas of the landscape. Buffers serve the function of enhancing infiltration of surface runoff generated on adjacent areas, thereby promoting the retention of nutrients in the soil, and retention of sediment suspended in the runoff water, while still allowing runoff water to reach the wetland through subsurface flow routes. To protect wetlands and receiving waters downstream from the wetlands it is important that wetlands in areas disturbed by human activities be provided with sufficient buffer to prevent degradation of wetland biotic integrity as well as degradation of wetland water quality.” (emphasis added)

“Runoff generated on areas contributing to wetlands help to sustain the hydrology, nutrient balances and plant life/wildlife of the wetlands. When the runoff generated is affected by human activity it can have a detrimental effect on the natural hydrologic balance of a wetland, and also adversely affect the quality of the wetland water as well as adversely affect the wetland plant and animal ecosystem. Buffers surrounding wetlands have the potential to protect the water quality and ecological quality of the wetlands from the stresses of human activities. Buffers serve to infiltrate excess water, excess nutrients and toxic substances, and also help to provide some shelter to wetland associated plants and animals from direct contact with adjacent human activities.”

“Wetlands are an ecosystem formed by the intermittent presence or persistence of water in a depression, flat or low topographic area. They are distinguished by the low velocity flow of water through them, their water tolerant (hydric) soils, and vegetation that is specifically adapted to grow in water (hydrophytes.) They are also notable for the types of wildlife that depend on these unique habitat characteristics.

“While wetlands are known to play an important hydrologic role in the remediation of sediment runoff and chemicals, they also have a limit to which they can do so effectively. If a wetland is subjected to excessive sedimentation, nutrient input or modification of the hydroperiod, its quality may become compromised and its ability to maintain crucial ecological diversity could be impaired. The upland area immediately adjacent to a wetland, referred to here as a buffer or riparian zone, is critical to wetland health. The dimensions, vegetative characteristics and soil composition, slope of these buffers, and their

surrounding land use all determine how well they might assist in mitigation of the various types of runoff or deposition to the wetland.”

Attachment 3

ORAM (Ohio Rapid Assessment Method) excerpt

The excerpt below⁸ is from the standard reference for determining the quality, or “Category”, of a wetland in Ohio under the Clean Water Act. It is the standard used for rating and mitigating wetlands.

7.2 Metric 2: Upland Buffers and Surrounding Land Use.

Wetlands are areas transitional between upland and aquatic environments. Like many natural systems, both terrestrial and aquatic, they are sensitive to human disturbances, both direct and indirect. Nutrient enrichment or eutrophication from stormwater inputs, urban runoff, or agricultural runoff can degrade wetlands just as these disturbances can degrade streams and lakes.

The questions in Metric 2 reflect the fact that wetlands with “buffer” zones between the wetland and human land uses are often less disturbed than wetlands without such buffers. Conversely, wetlands that are located in places where human land use is more intensive are often subject to greater degrees of disturbance. However, it is important to stress that merely because a wetland is located in an area with intensive human land uses does not mean that it is or will become degraded.

Metric 2 is very similar to earlier versions of the ORAM with the exception that the point values have been adjusted. See e.g., Questions 11 and 12 in ORAM v. 4.1.

7.2.1 Question 2a: Average Buffer Width. (emphasis added)

For the purposes of this question, “buffer” means non-anthropogenic landscape features which have the capability of protecting the biological, physical, and/or chemical integrity of the wetland from effects of human activity. Typically, a buffer could be forested or shrubby margin, prairie, streams or lakes, old fields, and in certain instances more managed landscapes like meadows or hay fields. Intensive human land uses should not be counted as buffers. These include active agricultural row cropping, fenced or unfenced pastures, paved areas, housing developments, golf courses, mowed or highly managed parkland, mining or construction sites, etc. A comprehensive list is not proposed in this manual. The key concept is whether the buffer area, whatever it is, functions to protect the wetland from degradation.

In order to calculate the average buffer width, estimate the width of buffer on each side of the wetland to a maximum of 50m and divide by the number of sides, e.g. the average buffer width of a wetland with buffers of 100m, 50m, 0m and 0m would be calculated as follows: $abw = (50 + 50 + 0 + 0)/4 = 25$. See Figure 6. The wetland in Figure 6 would score 4 points for Question 2a. A wetland with buffers greater than 50m on all sides would have an $abw > 50m$ and would score 7 points.

This procedure works well with smaller wetlands. For very large wetlands or wetlands with unusual shapes there may be multiple “sides” and it may be difficult to measure, determine, or obtain access to all of the sides of the wetland. In this situation, the Rater may consider this question to provide a buffer

⁸ Mack, J. 2001. Ohio Rapid Assessment Method for Wetlands v. 5.0, User’s Manual and Scoring Forms. Ohio EPA Technical Report WET/2001-1. Ohio Environmental Protection Agency, Division of Surface Water, 401/Wetland Ecology Unit, Columbus, Ohio. www.epa.state.oh.us/portals/35/401/oram50um_s.pdf

continuum from very narrow to wide and assign the points associated with the most appropriate category.

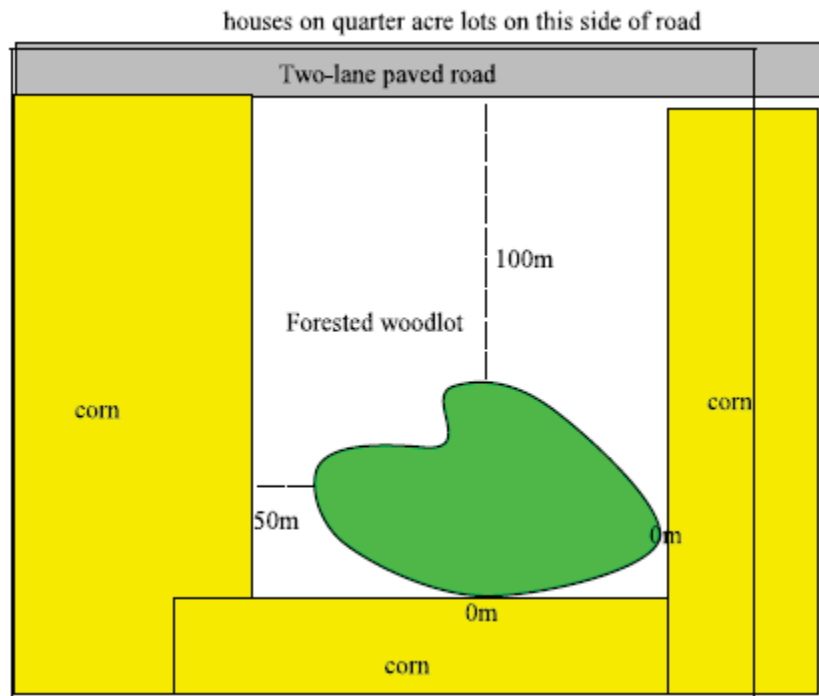


Figure 6 Hypothetical wetland example for estimating average buffer width

ORAM, Metric 2a

Metric 2a. Average Buffer Width. Calculate the buffer width and select only one score. DO NOT DOUBLE CHECK.

7 pts WIDE = >50 meters (>164 ft) around perimeter

4 pts MEDIUM = 25 to < 50 meters (82 – <164 ft) around perimeter

1 pts NARROW = 10 to <25 meters (32 – <82 ft) around perimeter

0 pts VERY NARROW = <10 meters (<32 ft) around perimeter

Note: These ORAM Average Buffer Width distances are mostly based on scoring wetlands for vegetation quality, with some recognition of protecting water quality (personal communication, Mick Micacchion, The Nature Conservancy in Ohio, 6/6/2019). While these buffers might be beneficial to wetland hydrology, factors such as hydrology are not the basis that was considered, and a wetland's hydrology might be dependent on a different width, often wider than proposed above.

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