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August 2, 2021

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Ohio Power Siting Board
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: Juliet Energy Project, LLC, Case No. 20-1760-EL-BGN

Dear Ms. Troupe:

Attached for filing in the above referenced case is Juliet Energy Project, LLC's Response to OPSB Staff's Third Data Request dated July 22, 2021.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Dylan F. Borchers

Attachment

Cc: Grant Zeto (w/Attachment)

**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 THIRD DATA REQUEST (Dated July 22, 2021)**

1. **The project is proposed in a somewhat densely populated area. Please describe the Applicant's best management practices regarding setbacks and aesthetic mitigation for non-participating residents.**

RESPONSE: Through collaboration with a group of 20+ neighbors (Weston Area Solar Farm Task Force), the Applicant has agreed to increase the non-participating residence setback to a requested minimum of 100 feet from the PV panel area fenceline to non-participating residential property lines.

The Applicant proposes to use vegetation to help screen views of the proposed solar facility, improve the aesthetics of the project, and provide ecological and wildlife habitat and mitigation of visual impacts. A Landscape Mitigation Plan (Appendix C of Exhibit P in the Application) was developed to suit the climate and match the existing natural and vernacular landscapes present in the area surrounding the Juliet Solar Site. The conceptual planting strategies, or "modules", included use native species and intentionally mimic the character of the adjacent landscape to minimize and mitigate the project's visual impact. These strategies have been developed to provide flexible solutions that fit both the scale of the Juliet Solar Facility and the visual character of specific settings. Locations of planting modules were selected for areas otherwise open or have uninterrupted views of the PV arrays and have the potential to result in substantial visual effects. These areas include open fields adjacent to roadsides, thin/partial hedgerows abutting neighboring residences, and areas adjacent to residences and/or resources throughout the Project Area.

If solar panels, fencing or other aboveground Project facilities are installed in an area within 500 feet of a residence located on a directly adjacent property, Juliet Solar will plant a vegetative buffer consisting of evergreen and native multi-stem trees and thick shrubs to help buffer the view of the solar panels in that area from the Neighbor Property. Juliet Solar shall maintain vegetative screening for the life of the facility and shall replace any failed plantings so that, after five years, at least 90 percent of the vegetation has survived. Additionally, in a modification to the simulation and schematic shared as "Module 3 – Adjacent house Hedgerow", an additional row of evergreen trees will be placed within the

diagramed module 3, doubling the density and number of evergreens within the vegetative buffer. Evergreen species under consideration include:

- Arborvitae
- Blue Spruce
- Eastern Red Cedar (dependent on proximity to fruit trees)
- Serbian Spruce
- Norway Spruce (dependent on proximity to solar panels. Due to this tree being a large, fast growing tree, potential locations are limited to locations near the project substation and on the south side of Sand Ridge Rd.)

2. **Other solar farm developers have proposed 300-foot setbacks from solar panels and related equipment from non-participating residences. Is the Applicant willing to commit to these setbacks? If not, what setback does the Applicant consider to be reasonable and why?**

RESPONSE: Through collaboration with a group of 20+ neighbors, the Applicant agreed to a minimum 100-foot setback from the PV panel area fenceline to non-participating residential property lines. With an additional 20 feet setback inside the panel area fenceline, this increased setback increases the setback between the PV panel area and non-participating residences above the 190 feet cited in the Application.

3. **Is the Applicant willing to commit to any of the following as mitigation for impacts to non-participating residences adjacent to the project (if no, please specify why)?**

a. **enhanced vegetative screening efforts (please specify)**

RESPONSE: At the request of a group of 20+ neighbors, the Applicant has committed to installing enhanced vegetative screening to mitigate impacts to adjacent non-participating residences. If solar panels, fencing or other aboveground Project facilities are installed in an area with an adjacent residence, Juliet Solar will plant a vegetative buffer consisting of evergreen and native multi-stem trees and thick shrubs to help buffer the view of the solar panels in that area from the Neighbor Property. Juliet Solar shall maintain vegetative screening for the life of the facility and shall replace any failed plantings so that, after five years, at least 90 percent of the vegetation has survived. Additionally, in a modification to the simulation and schematic shared as “Module 3 – Adjacent house Hedgerow,” Juliet Solar is committing in Good Neighbor Agreements to plant an additional row of evergreen trees within the diagramed module 3, doubling the density and number of evergreens within the vegetative buffer. Evergreen species under consideration include:

- Arborvitae
- Blue Spruce
- Eastern Red Cedar (dependent on proximity to fruit trees)

- Serbian Spruce
- Norway Spruce (dependent on proximity to solar panels. Due to this tree being a large, fast growing tree, potential locations are limited to locations near the project substation and on the south side of Sand Ridge Rd.)

b. enhanced setbacks for non-participating residences surrounded on multiple sides

RESPONSE: Please refer to the response to question #1. At the request of an organized neighbor group, the Applicant has committed to installing enhanced vegetative screening to mitigate impacts to adjacent non-participating residences. Additionally, the Applicant has entered into, or is in the process of negotiating, Good Neighbor Agreements with a majority of the members of the Weston Area Solar Farm Task Force to provide payments throughout the life of the project calculated based on the number of sides a residence has aboveground facilities installed within 500 ft.

c. property value guarantees or compensation

RESPONSE: There is no evidence that solar projects have a negative impact on property value. Examining property value in states across the United States demonstrates that large-scale solar arrays often have no measurable impact on the value of adjacent properties, and in some cases may even have positive effects. Proximity to solar farms does not deter the sales of agricultural or residential land. Large solar projects have similar characteristics to a greenhouse or single-story residence. Usually no more than 15 feet high, solar projects are often enclosed by fencing and/or landscaping to minimize visual impacts.

Nonetheless, Applicant has offered adjacent homeowners Good Neighbor Agreements, providing commitments on vegetative buffers and payments throughout the life of the project. The Applicant is expecting to enter into 15 or more Good Neighbor Agreements and has already received more than 10.

4. Is the Applicant willing to commit to any vegetative screening for Michael Merrill Park? The park is located 0.1 miles away from the Project Area and projected to be partially visible according to Exhibit P - Visual Resource Assessment and Mitigation Plan Part 2 of 2.

RESPONSE: Michael Merrill Park is located 0.1 mile east of the Project. This park is projected to have intermittent Project visibility mostly via Taylor Street, which runs east-west just north of the park. However, existing vegetation and residential and civic development will obscure most views of the Project. There are proposed mitigation plantings between Taylor Street and the Project, as indicated in VRA Appendix C Landscape Mitigation Plan. The proposed locations of the planting modules shown in the Landscape Mitigation Plan are expected to soften visible effects of the PV arrays from Michael Merrill Park. The Project will commit to utilizing planting modules to best accomplish this goal.

This foregoing document was electronically filed with the Public Utilities

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8/2/2021 2:18:08 PM

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

Summary: Response of Juliet Energy Project, LLC to Staff's Third Set of Data Requests dated July 22, 2021 electronically filed by Teresa Orahod on behalf of Dylan F. Borchers