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March 31, 2022

Ms. Tanowa M. Troupe, Secretary Public Utilities Commission of Ohio 180 E. Broad Street, 11th Floor Columbus, Ohio 43215

Re: Yellowbud Solar, LLC (Case No. 20-972-EL-BGN)

Stormwater Controls and Drainage

Dear Ms. Troupe:

Please find attached correspondence from Yellowbud Solar, LLC regarding stormwater controls and drainage.

Please call me if you have any questions.

Very truly yours,

/s/ Anna Sanyal

Anna Sanyal Attorney for Yellowbud Solar, LLC

AS/jaw

cc: Robert Holderbaum, OPSB Staff William Risse, Permitting Specialist March 31, 2022

Ohio Power Siting Board Docketing Division 180 E Broad St. Columbus, OH 43215

RE: Yellowbud Solar, LLC (Case 20-972-EL BGN) - Request by Ohio Power Siting Board Staff for Additional Information Regarding Stormwater Controls and Drainage

To Whom It May Concern,

At the request of the Ohio Power Siting Board staff, Yellowbud Solar, LLC (Yellowbud) is providing updates regarding stormwater control measures at the 274 MW Yellowbud Solar Construction site as well as addressing questions regarding ponding within the Project Area. Yellowbud remains committed to addressing questions, concerns, or complaints from the public, and seeks to be a good neighbor. Greg Courter, Yellowbud's Construction Manager, remains available at 715-450-1788 at any time to address questions regarding the construction of the Project. Greg works with the Yellowbud team to input and address questions and complaints received from the public as part of Yellowbud's complaint resolution process.

## **Stormwater Erosion Control Measures**

Maintenance of best management practices (BMPs), pursuant to condition 20 of the Certificate issued in Case No. 20-972-EL-BGN, will be ongoing throughout construction of the Project. Both weekly inspections and inspections following rain events are ongoing to ensure continued maintenance of all erosion control measures implemented across the site. Yellowbud's third party environmental specialist is also completing additional checks of erosion control measures.

Kiewit, the primary contractor who holds the construction stormwater permit for the Yellowbud Solar Site, walked the site on the morning of March 14<sup>th</sup> with the Ohio EPA (OEPA). They reviewed BMPs with the OEPA representative. The discussion was productive, and as a result, at a select few culvert locations, and following the site visit, Kiewit installed rock ditch checks to further slow water flows and prevent potential offsite sedimentation. Additional permanent solutions have also been coordinated and will be maintained for the duration of construction. Below is a picture of one of the rock ditch checks that was implemented following the site visit. Yellowbud and Kiewit understand the important of a well-kept site and will continue to utilize best practices for the duration of construction.

**Image 1: Rock Ditch Check Feature at the Yellowbud Site** 



## **Temporary Onsite Ponding and Drainage**

Regarding hydrology and ponding, the Ross County Engineer recently placed a low water crossing sign on Lutz Road adjacent to the Project Area to address localized ponding on the roadway. The water has since receded and is no longer covering the roadway. Based on discussions between Kiewit, Yellowbud, and the County Engineer, this is something that has occurred at this location in the past, prior to any construction. Yellowbud also has evidence of this same ponding via the hydrology modelling that was submitted as part of the site permit application. Springtime is traditionally the time of year where temporary ponding would be most likely to occur. Image 2 below shows ponding potential in this area in shades of blue based on hydrologic modelling. At the Lutz Road location specifically, Yellowbud is in the process of implementing post construction stormwater controls via the development of two basin features to help reduce flooding potential of the roadway, but also to assist in the long-term operation of the facility. These will be within the fenced area of the Project, and these features will be incorporated into Yellowbud's Storm Water Pollution Prevention Plan as they shall assist long-term management of runoff quality and quantity at the location.





Image 3 shows a drone image collected on January 12, 2022 in an area where only BMPs have been implemented, but no other construction activities were yet underway. This was collected following a rain event within the Project Area. As the image shows, there are areas of temporary ponding across the Project Area, and it is the nature of this site for some temporary ponding to occur, with or without construction activities. Yellowbud must meet strict tolerances for flooding or temporary ponding to accommodate the operations of the solar facility. Drainage solutions such as drain tile improvements, ongoing drain tile maintenance, and basins are actively being implemented to ensure proper drainage in non-wetland areas. To be clear, and as noted in Image 3, temporary ponding across the site has traditionally occurred. All site preparation has followed existing contours, and no major changes to drainages or hydrology have occurred because of construction activities.

Image 3: Drone Image from January 12, 2022



## **Public Questions, Concerns, or Complaints**

As noted earlier in this memo, Yellowbud remains committed to addressing questions, concerns, or complaints from the public, and seeks to be a good neighbor. Greg Courter, Yellowbud Construction Manager, remains available at 715-450-1788 at any time to address questions regarding the construction of the Project.

Sincerely,

William Risse

Yellowbud Solar, LLC

Senior Permitting Specialist

952-300-9476

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## This foregoing document was electronically filed with the Public Utilities Commission of Ohio Docketing Information System on

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Case No(s). 20-0972-EL-BGN

Summary: Correspondence Correspondence Regarding Stormwater Controls and Drainage electronically filed by Ms. Anna Sanyal on behalf of Yellowbud Solar, LLC