

## BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of	)	
Paulding Wind Farm III LLC to Amend	)	
Phase II of the Certificate	)	Case No. 15-2030-EL-BGA
of Environmental Compatibility and	)	
Public Need Issued in	)	
Case No. 10-0369-EL-BGN	)	

In the Matter of the Joint Application	)	
of Paulding Wind Farm LLC and	)	
Paulding Wind Farm III LLC to Amend	)	Case No. 15-2031-EL-BGA
the Certificate of Environmental	)	
Compatibility and Public Need Issued	)	
in Case No. 09-0980-EL-BGN	)	

### Supplemental Information to the Applications to Amend the Timber Road II Phase II Wind Farm Certificate and the Timber Road I Wind Farm Certificate

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## TABLE OF CONTENTS

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4906-17-01	overview of supplemental information.....	1
(A)	APPLICATION FILING REQUIREMENTS .....	1
(B)	DEFINITIONS.....	1
4906-17-02	PROJECT SUMMARY .....	2
(A)	PROJECT SUMMARY AND FACILITY OVERVIEW.....	2
(B)	GENERAL OVERVIEW .....	3
(C)	ELECTRONIC COPY OF DATA.....	4
(D)	EXPLANATION OF WHY CERTAIN REQUIREMENTS ARE NOT APPLICABLE.....	4
4906-17-03	PROJECT DESCRIPTION AND SCHEDULE.....	4
(A)	DETAILED PROJECT DESCRIPTION.....	4
(B)	DETAILED PROJECT SCHEDULE.....	5
4906-17-04	PROJECT AREA ANALYSES.....	5
4906-17-05	TECHNICAL DATA .....	6
(A)	SITE .....	6
(B)	LAYOUT AND CONSTRUCTION.....	6
(C)	EQUIPMENT .....	10
(D)	REGIONAL ELECTRIC POWER SYSTEM.....	10
4906-17-06	FINANCIAL DATA.....	10
(A)	OWNERSHIP .....	10
(B)	CAPITAL AND INTANGIBLE COSTS .....	10
(C)	OPERATION AND MAINTENANCE EXPENSES .....	10
(D)	DELAYS .....	10
4906-17-07	ENVIRONMENTAL DATA.....	10
(A)	GENERAL .....	10
(B)	AIR .....	11
(C)	WATER .....	11
(D)	SOLID WASTE.....	11
4906-17-08	SOCIAL AND ECOLOGICAL DATA .....	12
(A)	HEALTH AND SAFETY.....	12
(B)	ECOLOGICAL IMPACT .....	12
(C)	ECONOMICS, LAND USE AND COMMUNITY DEVELOPMENT.....	17
(D)	CULTURAL IMPACT .....	20

(E)	PUBLIC RESPONSIBILITY .....	21
(F)	AGRICULTURAL DISTRICT IMPACT .....	21

**TABLES<sup>1</sup>**

Table 08-1.	Impacts to Ecological Communities .....	14
Table 08-2.	Delineated Stream and Wetland Features Associated with Modified Facility Components .....	16
Table 08-3.	Land Use Impacts .....	19
Table 08-4.	Impacts to Agricultural Land .....	22

**FIGURES<sup>1</sup>**

Figure 05-4.	Site Layout
Figure 08-1.	Ecological Features
Figure 08-3.	Agricultural Resources

<sup>1</sup> To maintain continuity, Table and Exhibit numbers were retained from the Original Application and only included herein where updates were needed.

## COMMONLY USED ACRONYMS and ABBREVIATIONS

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EDPR	EDP Renewables North America LLC
EDR	Environmental Design & Research, Landscape Architecture, Planning, Environmental Services, Engineering and Surveying, D.P.C.
HHEI	Primary Headwater Habitat Index
ODNR	Ohio Department of Natural Resources
OPSB	Ohio Power Siting Board
ORAM	Ohio Rapid Assessment Method

On December 9, 2015, Paulding Wind Farm LLC, a wholly-owned subsidiary of EDP Renewables North America LLC (EDPR) and Paulding Wind Farm III LLC submitted a joint application to amend the certificate of environmental compatibility and public need issued by the Ohio Power Siting Board (the "Board" or "OPSB") in Case No. 09-0980-EL-BGN (the "Timber Road I Certificate") for the Timber Road I Wind Farm. Also on December 9, 2015, Paulding Wind Farm III LLC submitted an application to amend the certificate of environmental compatibility and public need issued by the OPSB in Case No. 10-0369-EL-BGA for the second phase of the Timber Road III Wind Farm (designated as the "Timber Road II Wind Farm"). Both applications, hereinafter referred to collectively as the "Petition", remain pending before the OPSB.

This submittal presents additional information regarding additional design changes to access roads and collection lines for both projects that with the Petition, are offered for consideration and approval by the OPSB. As a result of opportunities to improve both projects' designs, Paulding Wind Farm LLC and Paulding Wind Farm III LLC (the "Joint Applicants") are proposing to reconfigure four collection lines in the Timber Road I Facility, resulting in a net decrease of approximately 370 feet of collection line compared to the layout presented in the Petition. In addition, Paulding Wind Farm III LLC is proposing to modify the access road system at the Timber Road III Facility, adding two access roads and reconfiguring another. Collectively, these changes will result in a net decrease of approximately 1,009 feet of access road. Proposed changes to the Timber Road III Facility also include adding a new approximately 10,717-foot buried collection line and reconfiguring seven additional buried collection lines, which collectively represent a net increase of approximately 11,828 feet (2.2 miles) compared to the layout presented in the Petition. When combined with the decrease proposed in the Petition, this represents a total decrease of approximately 11,392 feet (2.1 miles) compared to the certified layout for the Timber Road III Wind Farm.

#### (A) APPLICATION FILING REQUIREMENTS

Not applicable to this Supplement.

#### (B) DEFINITIONS

As used in this Supplement, specific terms will have the meanings set forth below.

##### (1) Facility

A "facility" or "wind-powered electric generation facility" or "wind-energy facility" includes all the turbines, collections lines, any associated substations, and all other associated equipment.

(2) Supplement

"Supplement" means collectively, the supplemental information to the Petition presented in this document.

(3) Joint Applicants

"Joint Applicants" means collectively, Paulding Wind Farm LLC and Paulding Wind Farm III LLC.

(4) Timber Road I Facility

The "Timber Road I Facility" means the Timber Road I Wind Farm.

(5) Timber Road III Facility

The "Timber Road III Facility" means the Timber Road III Wind Farm (Phase II of the Timber Road II Wind Farm).

## **4906-17-02 PROJECT SUMMARY**

### **(A) PROJECT SUMMARY AND FACILITY OVERVIEW**

(1) General Purpose of the Facility

Not applicable to this Supplement.

(2) Description of the Facility

The description of both the Timber Road I Facility and the Timber Road III Facility remain as presented in the Petition with the exception of the changes presented in this Supplement. Through this Supplement, the Joint Applicants are proposing to reconfigure four collection lines in the Timber Road I Facility, resulting in a net decrease of approximately 370 feet of collection line compared to the layout presented in the Petition. In addition, Paulding Wind Farm III LLC is proposing to modify the access road system at the Timber Road III Facility, adding two access roads and reconfiguring another. Collectively, these changes will result in a net decrease of approximately 1,009 feet of access road. Proposed changes to the Timber Road III Facility also include adding a new approximately 10,717-foot buried collection line and reconfiguring seven additional buried collection lines, which collectively represent a net increase of approximately 11,828 feet (2.2 miles) compared to the layout presented in the Petition. When combined with the decrease proposed in the Petition, this represents a total decrease of approximately 11,392 feet (2.1 miles) compared to the certified layout for the Timber Road III Wind Farm. See Section 4906-17-05(B)(1) of this Supplement for specific information about the locations of each new and/or modified access road and collection line.

The collection lines and access road will be installed in the same manner described in 4906-17-05(B)(1) of the Petition, and will have the same footprint of disturbance as presented in Table 03-2 of the Petition. All new and reconfigured components remain in active agricultural land. Figure 05-4 has been updated for this Supplement to show the revised collection lines for the Facilities and the new access road. All other Facility components remain as described in the Petition.

(3) Site Selection for Proposed Amendments to Collector Substation and Associated Access Road

The locations of the re-configured collection lines proposed for the Timber Road I Facility and Timber Road III Facility were selected based on advancements to the Facility designs, to accommodate landowner preferences, and to reduce temporary soil and agricultural impacts. The new segment of collection line at the Timber Road III Facility was added because another circuit is required to deliver electricity to the substation; the proposed location was selected to minimize temporary soil and agricultural impacts by co-locating with a buried collection line submitted in the Petition. The access road changes at the Timber Road III Facility were selected to provide access to a meteorological tower, improve accessibility to a string of turbines, and accommodate landowner preferences.

(4) Environmental and Socioeconomic Considerations

The modifications proposed in this Supplement will not result in any increased impact to environmentally sensitive resources. The new and reconfigured access roads and collection lines are located entirely in active agricultural land. As described in Section 4906-17-08(B)(2)(a), there are some instances where a re-configured collection line crosses a delineated stream or wetland at a different spot than contemplated in the Petition. However, due to the linear nature of the regional ditch and agricultural drainage system in this area, impacts remain comparable.

(5) Current Project Schedule

Not applicable to this Supplement.

(B) GENERAL OVERVIEW

This Supplement presents minor changes in the facilities' layout, as described herein, consisting of the addition of two access roads and one buried collection line, and the reconfiguration of one access road and eleven buried collection lines.

(C) ELECTRONIC COPY OF DATA

The Joint Applicants have prepared updated hard copy maps illustrating the proposed changes to the facility layouts using digital, geographically referenced data. An electronic copy of all such data will be provided to Board staff (excluding data obtained under a licensing agreement which prohibits distribution).

(D) EXPLANATION OF WHY CERTAIN REQUIREMENTS ARE NOT APPLICABLE

As indicated above, information previously presented in the Petition that remains unchanged as a result of this Supplement is denoted as such or noted as "not applicable" under the corresponding rule throughout this document.

**4906-17-03 PROJECT DESCRIPTION AND SCHEDULE**

(A) DETAILED PROJECT DESCRIPTION

The information presented in the Petition remains unchanged subject to this Supplement which describes further minor changes to the access roads and collection lines as a result of advancements in project design. Figure 05-4 has been updated to show the revised layout for the Facility.

(1) Description Details for the Project

(a) *Type of Turbine*

Not applicable to this Supplement.

(b) *Land Area Requirements*

No changes to the Impact Assumptions are proposed as part of this Supplement. Table 03-2 of the Petition presents the estimated footprint for the Facility's access roads and buried collection lines (components addressed in this Supplement).

(2) Description of Major Equipment

The permitted Timber Road I Facility included approximately 16.9 miles of underground collection lines. The Petition sought to eliminate seven segments of collection line, add two segments of collection line, and reconfigure six segments of collection line, which would result in a net decrease of approximately 13,019 feet (2.5 miles) of underground collection lines. This Supplement seeks to modify four additional segments of collection line for a net decrease of approximately 370 feet. When combined with the decrease proposed in the Petition, this represents a total decrease of approximately 13,389 feet compared to the certified layout for the Timber Road I Wind Farm. All disturbance associated with the collection lines will be temporary in nature.



No new permanent impacts will occur as a result of the revised collection line system, and this Supplement does not propose any changes to access roads, turbines, or any other Timber Road I Facility components.

The permitted Timber Road III Facility included approximately 28.0 miles of underground collection lines and approximately 11.3 miles of access road. The Petition sought to eliminate four segments of collection line, add five segments of collection line, and reconfigure ten segments of collection line, which would result in a net decrease of approximately 23,220 feet (4.4 miles) of underground collection lines. This Supplement seeks to add one new segment of collection line and modify seven additional segments of collection line, for a net increase of approximately 11,828 feet (2.2 miles). When combined with the decrease proposed in the Petition, this represents a total decrease of approximately 11,392 feet (2.1 miles) compared to the certified layout for the Timber Road III Wind Farm. With respect to access roads, the Petition sought to eliminate three segments of access road, add three segments of access road, and reconfigure four segments of access road, which would result in a net increase of approximately 4,517 feet (0.9 mile). This Supplement seeks to add two new access roads and reconfigure one access road, which will collectively result in a net decrease of approximately 1,009 feet (0.2 mile) of access road. When combined with the increase proposed in the Petition, this represents a total increase of approximately 3,508 feet (0.7 mile) compared to the certified layout for the Timber Road III Wind Farm.

All other major equipment remains as described in the original Applications and Amendments.

- (3) Need for New Transmission Lines  
Not applicable to this Supplement.

#### (B) DETAILED PROJECT SCHEDULE

- (1) Schedule  
Not applicable to this Supplement.
- (2) Impact of Critical Delays  
Not applicable to this Supplement.

## **4906-17-04 PROJECT AREA ANALYSES**

Figure 05-1 remains as presented in the Petition. None of the features depicted in the figure have been modified in this Supplement.

## 4906-17-05 TECHNICAL DATA

### (A) SITE

#### (1) Geography and Topography

Not applicable to this Supplement.

#### (2) Aerial Photographs

Not applicable to this Supplement.

#### (3) Existing Features Map

Not applicable to this Supplement.

#### (4) Geology and Seismology

Not applicable to this Supplement.

#### (5) Hydrology and Wind

Not applicable to this Supplement.

### (B) LAYOUT AND CONSTRUCTION

#### (1) Project Area Site Activities

Sub-sections required under 4906-17-05(B)(1) for which nothing has changed since the Petition are not included (e.g., turbines, collector substation, etc.).

##### (a) *Access Roads*

This section describes each of the three changes to the Timber Road III access road system proposed in this Supplement. No changes are proposed for the access roads at the Timber Road I Facility.

Paulding Wind Farm III LLC, in addition to the changes in the Petition, proposes to modify the access road system at the Timber Road III Facility, adding two access roads and reconfiguring another. Collectively, these changes will result in a net decrease of approximately 1,009 feet of access road.

- The access road to turbine 12, originally permitted as turbine 107, has been reconfigured to approach the turbine from the east rather than from the north. This will result in a decrease of approximately 2,069 feet of access road compared to the layout in the Petition.
- Turbine 20 was permitted as turbine 90 in the Timber Road III Facility, and its access road spurred into a much longer access road running both north and south. The permitted section of access road south of turbine 20 that connected to County Road (CR) 124 was proposed for removal in Petition, which would have eliminated approximately 887 feet of access road. This segment is being restored in this Supplement, resulting in an increase of approximately 887 feet compared to the layout submitted in the Petition.
- There is a meteorological tower located north of Town Road (TR) 124 and south of turbine 5, originally permitted as turbine 89. This Supplement seeks to add a new 173-foot access road spur to service the meteorological tower.

See Figure 05-4, which has been updated for this Supplement to show the modified access roads.

(b) *Buried Collection System Installation*

This Supplement seeks to modify four collection lines in the Timber Road I Facility and eight collection lines in the Timber Road III Facility. This section describes each of the proposed changes to the collection line system.

The locations of four underground collection lines for the Timber Road I Facility will be shifted, which will collectively result in a net decrease of approximately 370 feet.

- The collection line between turbines 39 and 41, originally permitted as turbines D2 and D4, has been reconfigured. This will result in net decrease of approximately 190 feet of collection line compared to the layout submitted in the Petition.
- The collection line between turbines 42 and 44, originally permitted as turbines D5 and D7, has been reconfigured. This will result in net decrease of approximately 107 feet of collection line compared to the layout submitted in the Petition.
- The collection line between of turbines 58 and 59, permitted as turbines E8 and E9, has been reconfigured. This will result in net decrease of approximately 204 feet of collection line compared to the layout submitted in the Petition.
- The collection line between turbine 47, permitted as turbine D10, and the collection substation has been reconfigured. This will result in net increase of approximately 131 feet of collection line compared to the layout submitted in the Petition.

Paulding Wind Farm III LLC, in addition to the changes in the Petition, proposes to add one underground collection line to the Timber Road III Facility and shift the location of seven additional underground collection lines, which will collectively result in a net increase of approximately 2.2 miles (11,828 feet). When combined with the decrease proposed in the Petition, this represents a total decrease of approximately 11,392 feet (2.1 miles) compared to the certified layout for the Timber Road III Wind Farm.

- A new 10,717-foot collection line has been added between turbine 17, originally permitted as turbine 93, and the collection substation. This represents a doubling of circuits, since it will be co-located with a collection line in the layout submitted in the Petition.
- The collection line between turbines 2 and 14, originally permitted as turbines 101 and 98, has been reconfigured. This will result in net increase of approximately 85 feet of collection line compared to the layout submitted in the Petition.
- The collection line between turbines 13 and 14, originally permitted as turbines 20 and 98, has been reconfigured. This will result in net decrease of approximately 67 feet of collection line compared to the layout submitted in the Petition.
- The collection line between turbines 10 and 11, originally permitted as turbines 78 and 19, and turbines 24 and 25, originally permitted as turbines 18 and 17, has been reconfigured. This will result in net decrease of approximately 497 feet of collection line compared to the layout submitted in the Petition.
- The collection line between turbines 24 and 34, originally permitted as turbines 18 and 16, has been reconfigured. This will result in a net decrease of approximately 105 feet compared to the layout submitted in the Petition.
- The collection line between turbines 33 and 34, originally permitted as turbines 83 and 16, has been reconfigured. This will result in a net decrease of approximately 158 feet compared to the layout submitted in the Petition.
- The collection line between turbines 32 and 48, originally permitted as turbines 82 and D11, has been reconfigured. This will result in a net decrease of approximately 745 feet compared to the layout submitted in the Petition.
- The collection line between turbines 18 and 20, originally permitted as turbines 92 and 90, has been reconfigured. This will result in net increase of approximately 2,598 feet of collection line compared to the layout submitted in the Petition.

See Figure 05-4, which has been updated for this Supplement to show the reconfigured collection lines.

(2) Layout

The proposed layout of the revised Facility components is illustrated on the updated Figure 05-4, which was prepared at a 1:12,000 scale using ESRI ArcGIS Online "World Imagery" as the base mapping. The remainder of the Facility components are as depicted in Figure 05-4 of the Petition.

(3) Structures

(a) *Dimensions*

Not applicable to this Supplement.

(b) *Construction Materials*

Not applicable to this Supplement.

(c) *Color and Texture*

Not applicable to this Supplement.

(d) *Photographic Interpretation or Pictorial Sketches*

This Supplement does not propose any changes to turbines or other visually prominent project components. From a visual impact perspective, the change proposed in this Supplement are relatively minor (i.e., adding/modifying twelve segments of buried collection line and three access roads). The collection lines will be buried underground and have no permanent visual impacts. The new and reconfigured access roads will be visible from the immediate surrounding areas, including limited portions of local public roads (i.e., CR 124 and CR 21), but do not represent a significant change to the visual landscape compared to the permitted layouts. Therefore the overall appearance of both the Timber Road I Wind Farm and the Timber Road III Wind Farm remain as described in the original applications. .

(e) *Unusual Features*

Not applicable to this Supplement.

(4) Plans for Construction

Not applicable to this Supplement.

(5) Future Plans

Not applicable to this Supplement.

(C) EQUIPMENT

(1) Wind Powered Electric Generation Equipment

Not applicable to this Supplement.

(2) Safety Equipment

Not applicable to this Supplement.

(3) Other Major Equipment

Not applicable to this Supplement.

(D) REGIONAL ELECTRIC POWER SYSTEM

Not applicable to this Supplement.

**4906-17-06 FINANCIAL DATA**

(A) OWNERSHIP

No further land rights are required to support the changes described in this Supplement to the Amendment to the Certificate.

(B) CAPITAL AND INTANGIBLE COSTS

Not applicable to this Supplement.

(C) OPERATION AND MAINTENANCE EXPENSES

Not applicable to this Supplement.

(D) DELAYS

Not applicable to this Supplement.

**4906-17-07 ENVIRONMENTAL DATA**

(A) GENERAL

Not applicable to this Supplement.

(B) AIR

Not applicable to this Supplement.

(1) Preconstruction

Not applicable to this Supplement.

(2) Construction

Not applicable to this Supplement.

(C) WATER

Not applicable to this Supplement.

(1) Preconstruction

Not applicable to this Supplement.

(2) Construction

Not applicable to this Supplement.

(3) Operation

Not applicable to this Supplement.

(D) SOLID WASTE

Not applicable to this Supplement.

(1) Preconstruction

Not applicable to this Supplement.

(2) Construction

Not applicable to this Supplement.

(3) Operation

Not applicable to this Supplement.

- (4) License and Permits

Not applicable to this Supplement.

## **4906-17-08            SOCIAL AND ECOLOGICAL DATA**

### **(A) HEALTH AND SAFETY**

- (1) Demographic

Not applicable to this Supplement.

- (2) Noise

Not applicable to this Supplement.

- (3) Water

Not applicable to this Supplement.

- (4) Ice Throw

Not applicable to this Supplement.

- (5) Blade Shear

Not applicable to this Supplement.

- (6) Shadow Flicker

Not applicable to this Supplement.

### **(B) ECOLOGICAL IMPACT**

- (1) Project Area Site Information

In support of the original applications, environmental consultants from various firms made numerous site visits to the Project Area, with extensive on-site ecological surveys conducted during multiple growing seasons. Then, in support of the preparation of the Petition, Environmental Design & Research, Landscape Architecture, Planning, Environmental Services, Engineering and Surveying, D.P.C. ("EDR") and the Mannik and Smith Group, Inc. ("MSG") conducted on-site ecological investigations focused on wetlands and streams in the previously un-surveyed portions of the area affected by layout changes. These surveys remain accurate



and are discussed in detail in the original applications and the Petition, and appended in full as Exhibits to those filings.

(a) *Open Spaces and Facility Map*

Figure 08-1 has been updated for this Supplement to show the revised Timber Road I Facility and Timber Road III Facility layouts. The remainder of the Facility layout, and lands within a 0.5-mile radius of the proposed Facility, are depicted on Figure 08-1 of the Petition. This mapping was developed at a 1:24,000 scale using ESRI ArcGIS Online "World Imagery" aerial imagery.

(b) *Vegetation Survey*

The vegetative communities found in the vicinity of the Timber Road I Facility and Timber Road III Facility components modified in this Supplement are consistent with that described in the original applications. Because the layout shifts associated with this Supplement are so minor, the sites for the new and modified access roads and collection lines were included in the mapping submitted with the original applications and with the Petition. All new and relocated collection lines and access roads are located in agricultural lands.

(c) *Animal Life Survey*

The wildlife habitat found in the vicinity of the Timber Road I Facility and Timber Road III Facility components modified in this Supplement is consistent with that described in the original applications. As indicated above, all new and relocated collection lines and access roads are located in agricultural lands; no additional habitats will be impacted. Since the available wildlife habitat types have not changed, the description of animal life presented in the original applications remains accurate.

(d) *Summary of Ecological Impact Studies*

The summary of ecological impact studies presented in the original applications and Petition remains accurate.

(e) *List of Major Species*

Information on major species remains as described in the original applications and Petition.

(2) Construction

(a) *Estimation of Impact of Construction on Undeveloped and Recreational Areas*

The Facility as proposed in this Supplement is located entirely on private land. Therefore, no construction-related impacts will occur at recreational areas, parks, wildlife areas, nature preserves, or other conservation areas as identified in rule 4906-17-08(B)(1)(a)(iii).

Upland Habitats

Table 08-1 updates impacts to ecological communities, based on the revised collection lines and access roads presented in this Supplement and the typical area of vegetation clearing column presented in Table 03-2 of the Petition.

**Table 08-1. Impacts to Ecological Communities**

Community <sup>1</sup>	Total Disturbance (acres)		Temporary Disturbance (acres)		Permanent Loss (acres)	
	Amendment	Supplement	Amendment	Supplement	Amendment	Supplement
<b>Timber Road I Facility</b>						
Agricultural Lands	419.8	419.5	357.0	356.7	62.8	62.8
Shrub and Brush Rangeland	0.7	0.7	0.7	0.7	0.0	0.0
<b>Total<sup>2</sup></b>	<b>420.5</b>	<b>420.2</b>	<b>357.7</b>	<b>357.4</b>	<b>62.8</b>	<b>62.8</b>
<b>Timber Road III Facility</b>						
Agricultural Lands	504.4	509.9	434.0	440.4	70.5	69.5
Shrub and Brush Rangeland	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>504.4</b>	<b>509.9</b>	<b>434.0</b>	<b>440.4</b>	<b>70.5</b>	<b>69.5</b>
<b>Combined Facility<sup>3</sup></b>	<b>809.0</b>	<b>814.1</b>	<b>678.6</b>	<b>684.7</b>	<b>130.3</b>	<b>129.4</b>

<sup>1</sup> Ecological community types were obtained from Ohio Department of Natural Resources (ODNR) Land Use/Land Cover shapefiles for Paulding County, and verified/updated using ESRI ArcGIS aerial imagery.

<sup>2</sup> Impact acreages presented here differ by 0.7 acre from impacts presented in Table 08-4, because the 0.7 acre of temporary impact that will occur in shrub and brush rangeland was not included in Table 08-4.

<sup>3</sup> The total impacts for the both the Timber Road I and Timber Road III Facilities are not simply the sum of the impacts for the Timber Road I and Timber Road III Facilities, because the collector substation and laydown areas are shared. As a result, simply adding the separate impacts would overstate the impacts of both projects.

As shown in Table 08-1, the design changes proposed in this Supplement will result in additional temporary impacts to agricultural land at the Timber Road III Facility compared to the layout presented in the Petition, although permanent impacts will actually decrease, due to the decrease in total length of access road. There are no changes to permanent impacts at the Timber Road I Facility, and temporary impacts will decrease slightly compared to the layout presented in the Petition.

Impacts to natural communities have been avoided to the extent possible, and no additional impacts to shrub and brush rangeland communities will occur due to the changes proposed in this Supplement. Of the 814.1 acres of total disturbance, 813.4 acres occur within agricultural lands and 0.7 acres occur within scrub-shrub habitats. One hundred percent of permanent impacts occur within agricultural lands.

Please note that agricultural lands have been included in the Table 08-4 above to fully account for all anticipated impacts. See Table 08-4 for a more detailed breakdown of impacts to various types of agricultural lands (i.e., pasture vs. cultivated croplands, etc.).

#### Wetland & Surface Water Habitats

The design changes proposed in this Supplement will result in some segments of collection lines crossing delineated wetlands and streams in different places than reported in the Petition and original applications. Table 08-2 presents, by modified Timber Road I Facility and Timber Road III Facility components, the changes to wetland and stream crossings as a result of the layout changes proposed in this Supplement.

Table 08-2. Delineated Stream and Wetland Features Associated with Modified Facility Components

Modified Component <sup>1</sup>	Feature ID	Change Compared to Petition	Feature Type	ORAM Score <sup>1</sup>	HHEI Score <sup>1</sup>	Qualitative Classification
<b>Timber Road I Facility</b>						
CL T39 to T41	B-4	shifted to the east	Wetland	17		Category 1 Wetland
CL T42 to T44	No stream or wetland crossings					
CL T58 to T59	A-22	shifted to the west	Wetland	16	-	Category 1 Wetland
	B-16	shifted to the west	Wetland	20	-	Category 1 Wetland
	A-26	new crossing	Wetland	23	-	Category 1 Wetland
CL T47 to Sub	B-16	shifted to the east	Wetland	20	-	Category 1 Wetland
<b>Timber Road III Facility</b>						
CL T17 to Sub (doubles existing circuit)	EEE	uses same crossing	Stream	-	50	Modified Class II PHWH
	A-30	uses same crossing	Stream	-	54	Modified Class II PHWH
CL T2 to T14	No stream or wetland crossings					
CL T13 to T14	CCC <sup>3</sup>	shifted to the east	Stream	-	25	Modified Class I PHWH
	H-5-C	existing crossing eliminated	Stream	-	36	Modified Class II PHWH
CL T10 to T11	H-31-A <sup>3</sup>	shifted to the north	Wetland	20	-	Category 1 Wetland
CL T24 to T34	H-32-C	shifted to the south <sup>4</sup>	Wetland	19	-	Category 1 Wetland
CL T33 to T34	No change to existing crossings associated with Petition layout					
CL T32 to T48	H-21-B	shifted to the south	Stream	-	11	Modified Class I PHWH
	B-6	shifted to the south	Wetland	12	-	Category 1 Wetland
CL T18 to T20	No stream or wetland crossings					
AR to T12	No stream or wetland crossings					
AR to T20	No stream or wetland crossings					
AR to MT	No stream or wetland crossings					

<sup>1</sup> AR = Access Road, CL = Collection Line, T = Turbine, MT = Meteorological Tower, Sub = Collection Substation. See Section 4906-17-05(B)(1) for more information about each modified section of access road and collection line.

<sup>2</sup> ORAM = Ohio Rapid Assessment Method, HHEI = Primary Headwater Habitat Evaluation Index, Subject to verification by Ohio EPA.

<sup>3</sup> The boundaries of this feature need to be extended.

<sup>4</sup> The layout presented in the Petition crossed this same roadside ditch further north, where the ditch was delineated as Stream DDD.

For both facilities, permanent stream and wetland impacts will be associated with access roads, while temporary impacts will be associated with collection lines and access roads. As described in the Petition, it is anticipated that permanent wetland impacts for both the Timber Road I and Timber Road III Facilities will total less than 0.1 acre, which will be confirmed during final engineering. This has not changed based on the layout changes proposed in this Supplement. A supplemental site-specific wetland and stream delineation will be conducted during the growing season for the features with approximated boundaries.

(b) *Estimation of Impact of Construction on Major Species*

The impact of construction on major species remains as described in the original Application and Petition.

(c) *Description of Short-term and Long-term Mitigation Procedures*

Not applicable to this Supplement.

(3) Operation

(a) *Estimation of Impact of Operation on Undeveloped and Recreational Areas*

Not applicable to this Supplement.

(b) *Estimation of Impact of Operation on Major Species*

Not applicable to this Supplement.

(c) *Procedures to Avoid/Minimize/Mitigate Short-term and Long-term Operational Impacts*

Not applicable to this Supplement.

(d) *Post-Construction Monitoring Plans*

Not applicable to this Supplement.

(C) ECONOMICS, LAND USE AND COMMUNITY DEVELOPMENT

(1) Land Use

(a) *Land Use Map*

Not applicable to this Supplement.

(b) *Residential Structures in Relation to the Boundary of the Proposed Facility*

There are a total of two residences within 100 feet of the boundary of the Timber Road I Facility, as proposed in this Supplement. Both are located within 100 feet of an access road. There are a total of 52 residences within 1,000 feet of the Timber Road I Facility, as proposed in this Supplement. These residences are primarily located within 1,000 feet of an access road or buried electrical collection line, although some are within 1,000 feet of the collector substation, meteorological tower, or laydown yard. There are no turbines located within 1,000 feet of a residential structure.

There are no residences within 100 feet of the boundary of the Timber Road III Facility, as proposed in this Supplement. There are a total of 52 residences within 1,000 feet of the Timber Road III Facility, as proposed in this Supplement. These residences are primarily located within 1,000 feet of an access road or buried electrical collection line, although some are within 1,000 feet of the collector substation or laydown yard. There are no turbines located within 1,000 feet of a residential structure.

Residential structures are depicted on Figure 05-3 of the original applications.

(c) *Locations of Turbines in Relation to Property Lines and Habitable Residential Structures*

Not applicable to this Supplement.

(d) *Land Use Impacts within 1 Mile of Facility*

The description of land use provided in the original application remains valid and accurate. Agriculture is the predominant land use in the vicinity of the Project Area. Table 08-3 updates land use impacts, based on the revised layout presented in this Supplement and the typical area of vegetation clearing column presented in Table 03-2 of the Petition. As measured by percent of total area, agricultural land (i.e., pasture, cropland, and farmstead land) comprises over 99% of the total impacts.

Table 08-3. Land Use Impacts

Land Use Type <sup>1</sup>	Total Disturbance (acres)		Temporary Disturbance (acres)		Permanent Loss (acres)	
	Amendment	Supplement	Amendment	Supplement	Amendment	Supplement
<b>Timber Road I Facility</b>						
Agricultural Lands	419.8	419.5	357.0	356.7	62.8	62.8
Shrub and Brush Rangeland	0.7	0.7	0.7	0.7	0.0	0.0
<b>Total<sup>2</sup></b>	<b>420.5</b>	<b>420.2</b>	<b>357.7</b>	<b>357.4</b>	<b>62.8</b>	<b>62.8</b>
<b>Timber Road III Facility</b>						
Agricultural Lands	504.4	509.9	434.0	440.4	70.5	69.5
Shrub and Brush Rangeland	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>504.4</b>	<b>509.9</b>	<b>434.0</b>	<b>440.4</b>	<b>70.5</b>	<b>69.5</b>
<b>Combined Facility<sup>3</sup></b>	<b>809.0</b>	<b>814.1</b>	<b>678.6</b>	<b>684.7</b>	<b>130.3</b>	<b>129.4</b>

<sup>1</sup> Land use types were obtained from ODNR Land Use/Land Cover shapefiles for Paulding County, and verified/updated using ESRI ArcGIS aerial imagery.

<sup>2</sup> Impact acreages presented here differ by 0.7 acre from impacts presented in Table 08-4, because the 0.7 acre of temporary impact that will occur in shrub and brush rangeland was not included in Table 08-4.

<sup>3</sup> The total impacts for the both the Timber Road I and Timber Road III Facilities are not simply the sum of the impacts for the Timber Road I and Timber Road III Facilities, because the collector substation and laydown areas are shared. As a result, simply adding the separate impacts would overstate the impacts of both projects.

As shown in Table 08-3, the design changes proposed in this Supplement will result in a small increase in temporary impacts to agricultural land (i.e., land will return to agricultural production following completion of construction activities). Permanent impacts will decrease compared to the layout presented in the Petition. There will be no additional impacts to forested, scrub-shrub, or farmstead land uses as a result of the changes proposed in this Supplement.

(e) *Structures That Will Be Removed or Relocated*

Not applicable to this Supplement.

(f) *Formally Adopted Plans for Future Use of Site and Surrounding Lands*

Not applicable to this Supplement.

(g) *Applicant's Plans for Concurrent or Secondary Uses of the Site*

Not applicable to this Supplement.

(2) Economics

Not applicable to this Supplement.

(3) Impact on Public Services and Facilities

Not applicable to this Supplement.

(4) Impact on Regional Development

Not applicable to this Supplement.

(D) CULTURAL IMPACT

Data on cultural and archaeological resources were collected by JFNew for both the Timber Road I and Timber Road II Wind Farms (which at that time included the Facility components re-assigned to the Timber Road III Wind Farm). These data were compiled into reports on the cultural impact of the projects, which were attached to both the original applications as Exhibit O. That information remains valid and accurate.

(1) Landmarks of Cultural Significance

Not applicable to this Supplement.

(2) Impact to Landmarks

Not applicable to this Supplement.

(3) Definition of Landmarks

Not applicable to this Supplement.

(4) Recreational Areas within Five Miles

Not applicable to this Supplement.

(5) Impact on Recreational Areas within One Mile

Not applicable to this Supplement.

(6) Visual Impact and Mitigation Measures

Not applicable to this Supplement.



(E) PUBLIC RESPONSIBILITY

(1) Public Interaction

Not applicable to this Supplement.

(2) Liability Insurance

Not applicable to this Supplement.

(3) Radio and Television Reception

Not applicable to this Supplement.

(4) Military Radar Systems

Not applicable to this Supplement.

(5) Roads and Bridges

Not applicable to this Supplement.

(6) Decommissioning

Not applicable to this Supplement.

(F) AGRICULTURAL DISTRICT IMPACT

(1) Agricultural Land Map

Figure 08-3 has been updated for this Supplement with the revised layout, and depicts agricultural land and agricultural district land in the vicinity of the Timber Road I Facility and the Timber Road III Facility.

(2) Potential Impacts and Proposed Mitigation

(a) *Evaluation of Impact from Construction, Operation, and Maintenance of the Proposed Facility on Agricultural Practices*

Table 08-04 updates impacts to agricultural land uses, based on the revised layout presented in this Supplement and the typical area of vegetation clearing column as presented in Table 03-2 of the Petition.

Table 08-4. Impacts to Agricultural Land

Agricultural Land <sup>1</sup>	Total Disturbance (acres)		Temporary Disturbance (acres)		Permanent Loss (acres)	
	Amendment	Supplement	Amendment	Supplement	Amendment	Supplement
<b>Timber Road I Facility</b>						
Cultivated Lands	418.0	418.2	355.9	356.0	62.2	62.2
Farmsteads	1.3	0.9	0.9	0.4	0.4	0.4
Pasturelands	0.5	0.5	0.2	0.2	0.2	0.2
<b>Total<sup>2</sup></b>	<b>419.8</b>	<b>419.5</b>	<b>357.0</b>	<b>356.7</b>	<b>62.8</b>	<b>62.8</b>
<b>Timber Road III Facility</b>						
Cultivated Lands	503.3	509.4	433.1	440.1	70.2	69.3
Farmsteads	1.1	0.5	0.9	0.2	0.3	0.3
Pasturelands	0.0	0.0	0.0	0	0.0	0.0
<b>Total</b>	<b>504.4</b>	<b>509.9</b>	<b>434.0</b>	<b>440.4</b>	<b>70.5</b>	<b>69.5</b>
<b>Combined Facility<sup>3</sup></b>	<b>808.3</b>	<b>813.4</b>	<b>130.3</b>	<b>129.4</b>	<b>677.9</b>	<b>684.0</b>

<sup>1</sup> Agricultural land use types were obtained from ODNR Land Use/Land Cover shapefiles for Paulding County, and verified/updated using ESRI ArcGIS aerial imagery.

<sup>2</sup> Impact acreages presented here differ by 0.7 acre from impacts presented elsewhere in the document (e.g., in Tables 08-1 and 08-3). This is because 0.7 acre of temporary impact will occur in shrub and brush rangeland. Since this is not an agricultural land use, these impacts are not included herein.

<sup>3</sup> The total impacts for the Timber Road I Facility and the Timber Road III Facility are not simply the sum of the impacts for the Timber Road I and Timber Road III Facilities, because the collector substation and laydown areas are shared. As a result, simply adding the separate impacts would overstate the impacts of the two projects.

Construction and operation of the Timber Road I Facility and Timber Road III Facility as proposed in this Supplement will not result in any impacts to confined feeding operations, managed woodlots, orchards, nurseries, or agriculturally related structures. Impacts to field operations, irrigation, and field drainage systems are as described in the original applications.

(b) *Proposed Mitigation Procedures*

Not applicable to this Supplement.

(3) *Impact on the Viability of Agricultural Land*

The impact of the Timber Road I Facility and Timber Road III Facility on the viability of agricultural land remains as described in the Petition and original applications.

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

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Summary: Application Supplement to Application to Amend - Narrative electronically filed by Mr. Ryan D. Elliott on behalf of Paulding Wind Farm LLC and Paulding Wind Farm III LLC