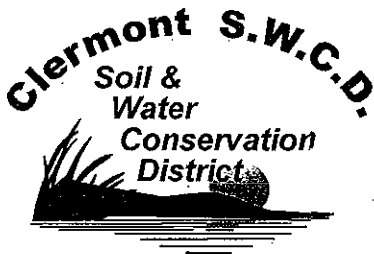


FILE



Clermont Soil & Water Conservation District

1000 Locust St., PO Box 549 Owensville, OH 45160

513-732-7075 • www.clermontswcd.org RECEIVED-DOCKETING DIV

2019 JUN -5 AM 10:45

April 26, 2019

PUCO

Michael. J Settineri
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008

18-1546-EL-BGN

The Clermont Soil and Water Conservation District (SWCD) appreciates the opportunity to review the Nestlewood Solar Application to the Ohio Power Siting Board. Clermont SWCD does not wish to intervene in the proceeding; however, we would like to make recommendations regarding storm water management for the site.

It is our recommendation that post-construction storm water management practice or practices (e.g., detention or retention basins) be provided for the site. Though the ground under the solar panels will remain open, the large number of panels (284,000), being installed in close proximity to one another and in linear arrays, will likely lead to concentrated flow paths following the drip lines of the panels. Additionally, the soils on site are poorly drained (Clermont soils, which cover 75% of the site, are considered hydric) and erode easily. Recognizing that some infiltration will occur under the panels, we don't believe it is necessary to treat the panels as 100% impervious, but their contribution should be taken into account when designing post-construction practices.

Clermont County's Building Inspection Department administers and enforces the "Water Management and Sediment Control" regulations for the county. In addition, Ohio EPA's Construction General Permit covers post-construction management requirements. We recommend that Nestlewood Solar I LLC work with these two agencies to determine appropriate post-construction storm water control measures for the site. Clermont SWCD would also be willing to provide assistance, if desired.

If you have any questions, please contact John McManus, Clermont SWCD Administrator, at jmcmanus@clermontcountyohio.gov, or at (513) 732-7075 ext. 3.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dave Anspach", is written over a horizontal line.

Dave Anspach, Chair
Clermont SWCD Board of Supervisors

CC: Clermont County Board of Commissioners
Clermont County Building Inspection Department

It is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
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"Promoting the wise use of our natural resources through service and education."