

To: Ohio Power Siting Board
Re: Madison Fields Solar Project, LLC
Case number 19-1881-EL-BGN
Date: December 3, 2020

Full testimony and this summary emailed 12/3/2020 to: contactOPSB@puco.ohio.gov, cc: MICAH.SCHMIDT@puco.ohio.gov, jftetzloff@aol.com (DCA)

Summary: Darby Creek Association testimony

My name is Anthony Sasson. I live at 8351 Patterson Road, Hilliard, Ohio, and do not live or work in the project area.

I am providing this testimony on behalf of the Darby Creek Association in the following areas concerning the proposed Madison Fields Solar Project. These are:

- Stormwater management and groundwater recharge;
- Encouraging native plant species establishment and management; and
- Invasive species management.

I am providing an abbreviated version of these comments. A longer version has been emailed to the Ohio Power Siting Board.

Thank you for your attention to these comments and recommendations. Please note they are subject to revision, and DCA is willing to advise further to provide additional recommendations and comments. The Darby Creek Association (DCA, <http://www.darbycreekassociation.org/>) was founded in 1972 as a nonprofit organization to protect the ecological integrity of the Big and Little Darby Creeks and tributaries and outstanding natural features of the watershed. We have the following preliminary recommendations we believe would make this a more environmentally sound and appropriate project for the area in which it is located, the Big Darby Creek watershed, and specifically within the Little Darby Creek watershed and the Darby Plains. Both the Big Darby Creek and Little Darby Creeks are National and State Scenic Rivers, and designated as Exceptional Warmwater Habitat and Outstanding State Waters by the State of Ohio. These streams support 37 rare and sensitive species of fish and mussels that are state and federally-listed, including federally-listed species downstream of this project in Little Darby Creek. It is recognized locally and statewide as an Ohio natural resource treasure. Efforts to protect the ecological integrity of the streams in this watershed are among the most extensive in Ohio.

The Big Darby Creek watershed, including Little Darby Creek, where this proposed project is located, includes some of the highest aquatic life scores ever recorded by Ohio EPA in addition to harboring the fish and mussels mentioned above. These species include five federally listed mussel species, two of which are found in Little Darby Creek near the proposed site.

Stormwater management and groundwater recharge:

In the DCA's written comments submitted to OPSB, we provide recommendations on enhancement of the stormwater management that will benefit the natural environment at and near the proposed

project. DCA requests that the site's stormwater permit application establish a groundwater recharge restoration goal for the entire site, significantly exceeding minimum requirements in the stormwater permit, and not just meeting the permit minimum, but reaching a goal, to the maximum extent possible, equivalent to that of the woods/forest, brush or meadow categories in this table. For any streams on the site, we strongly encourage the applicant to significantly exceed the minimum riparian setback requirements found in the stormwater permit, establish native vegetation in this riparian setback area and encourage groundwater recharge to help protect these streams.

Encouraging native plant species establishment and management:

While DCA generally agrees with the recent OPSB staff report for this proposed project, we find that many of the plant species described in reports and guidance (such as this staff report-referenced Ohio Pollinator Habitat Initiative) are not plants native to the Darby Plains, and some are not native to Ohio or the U.S. DCA strongly encourages that all areas at the proposed site should be planted in species native to the Darby Plains, and avoid plant species not native to this area. The DCA has a list of Darby Plains prairie plant species, including grasses, forbs, trees and shrubs, which we can provide to the applicant and others. These were determined from botanical survey references such as King (1981). We note that Ohio Department of Natural Resources Scenic Rivers Program staff recommend that seed mixes be limited to native species, and that they also incorporate native prairie grasses. The Madison Soil and Water Conservation District also has supported planting of native species. Species native to the Darby Plains, such as the prairie forbs and grasses, and are more adapted to the soil and climate of the area, helping to preserve the natural heritage of the area.

Invasive species management

We expect invasive plant species control to be problematic. For example, honeysuckle, autumn olive and callery pear grow readily in Madison County, and are found nearby along Little Darby Creek and threaten nearby nature preserves. DCA expects these will become problems at this site. We ask that the facility diligently manage invasive species and maintain the native vegetation, especially when invasive species are common and can dominate the vegetation in the general area.

We believe these recommendations would make this a better project if it is approved and proceeds. Attention to these recommendations would recognize the unusual but outstanding nature of the site and go beyond basic compliance with OPSB and other permit requirements. These should help to improve the protection of the natural heritage of the site, the area's native vegetation and the National Scenic River, Little Darby Creek.

Thank you for your attention to these comments and recommendations. Please note they are subject to revision, and DCA is willing to advise further to provide additional recommendations and comments.

Sincerely,

Anthony Sasson
8351 Patterson Road

Hilliard, Ohio 43026
Darby Creek Association
darbycreekassociation.org
614 519-9291
asasson@aol.com

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Summary: Exhibit Madison Fields DCA Pubic Hearing Testimony - Sasson Summary electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc. and Gibson, Karen Sue Mrs.