

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of Ross County Solar, LLC for a Certificate of Environmental Compatibility and Public Need.)))))	Case No. 20-1380-EL-BGN
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SUPPLEMENTAL TESTIMONY OF MATTHEW ROBINSON

Q.1. Please state your name, title and business address.

A.1. My name is Matthew Robinson. I am a Visualization Project Manager at Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (“EDR”). My business address is 217 Montgomery Street, Suite 1000, Syracuse, New York 13202.

Q.2. On whose behalf are you offering testimony?

A.2. I am testifying on behalf of the Applicant, Ross County Solar, LLC (“Applicant”), in support of its Application filed in Case No. 20-1380-EL-BGN.

Q.3. Did you previously provide testimony on behalf of Applicant?

A.3. Yes, on April 14, 2021.

Q.4. What is the purpose of your supplemental testimony?

A.4. The purpose of my supplemental testimony is to address Condition 14 in the Joint Stipulation filed on May 18, 2021.

Q.5. Do you support Condition 14 in the Joint Stipulation?

A.5. Yes. The condition ensures that the Applicant will implement the landscape mitigation planting modules it submitted as part of the Visual Resource Assessment and Landscape Mitigation Plan (Exhibit V to the Application). The condition also takes into account that the Landscape Mitigation Plan may be updated as a result of the Project’s final

1 engineered design as well as through communications with non-participating property
2 owners. To ensure these changes are communicated to Staff, the condition requires the
3 Applicant to provide any updates to the plan to Staff at least 30 days prior to
4 implementation.

5 There are two important prongs to Condition 14 that will benefit adjacent, non-participating
6 landowners. First, the Applicant will replace any failed plantings during the first five years
7 after construction to ensure that at least 90% of the vegetation has survived as of the five-
8 year point. The purpose of the five-year period is to allow plantings to become established.
9 Second, Condition 14 requires the Applicant to maintain vegetative screening for the life
10 of the Project. As shown in the Landscape Mitigation Plan (Appendix C to Exhibit V of
11 the Application), screening for the Project will consist of various landscape screening
12 modules. To ensure screening modules are functioning as designed, the second prong
13 requires the Applicant to replace failed plantings within a screening module if necessary to
14 ensure the screening module remains effective at that location. The requirement in
15 Condition 14 to maintain vegetative screening for the life of the Project will also ensure
16 that any plant die-off during the life of the Project will not result in gaps in screening
17 modules.

18 Additionally, the condition also ensures Applicant will implement the Lighting Plan it
19 submitted (Exhibit F to the Application). Again, because there may be changes in the
20 Lighting Plan as a result of the Project's final engineered design as well as through
21 communication with non-participating property owners, the condition requires the
22 Applicant to provide any updates to Staff at least 30 days prior to implementation. I expect
23 that final plan to be very similar to the Lighting Plan attached to the Application as Exhibit

1 F, which addresses construction lighting, equipment illumination, security lighting, and
2 lighting during Project operations.

3 **Q.6. Is Condition 14 in the Joint Stipulation in the public interest?**

4 **A.6.** Yes. The requirements in Condition 14 will ensure that the visual impact of the
5 Project is minimized through proper siting combined with well-developed landscape and
6 lighting plans.

7 **Q.7. Does this conclude your supplemental direct testimony?**

8 **A.7.** Yes, it does.

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5/21/2021 4:48:20 PM

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Case No(s). 20-1380-EL-BGN

Summary: Testimony Supplemental Testimony of Matthew Robinson electronically filed by Ms. Anna Sanyal on behalf of Ross County Solar, LLC