



May 28, 2021

Re: Response to Pleasant Prairie Solar Township Board of Trustees public meeting

Via email

rpeters@prairietownship.org

Rob Peters
Administrator
Prairie Township
23 Maple Drive
Columbus, Ohio 43228

Dear Mr. Peters:

We are responding to Prairie Township's request for comments following the township's meeting of May 25 on the proposed Pleasant Prairie Solar facility, part of which would be in Prairie Township (<https://www.prairietownship.org/426/Pleasant-Prairie-Solar-Energy-Project>).

These comments address the need to adequately plan for stream restoration along Hamilton Run and McCoy Ditch, and especially for the transmission lines associated with Pleasant Prairie Solar to avoid limiting the potential for the highest quality stream restoration. As you know, these stream are tributaries to Hellbranch Run, itself a tributary of State and National Scenic River and the Big Darby Accord includes these reaches in the planned stream restoration area

We are submitting these comments on behalf of the Darby Creek Association, a nonprofit organization that has advocated for protection and improvement of Big Darby Creek and tributaries since 1972. The Big Darby is a State and National Scenic River because of its outstanding quality. However, stresses threaten this biodiversity, such as degraded tributary health and rare mussel species declines.

Please note that while Anthony Sasson of the DCA is not a resident of Prairie Township, when he worked for The Nature Conservancy in 2002 he was involved in the land acquisition when Prairie Township's parcel, known as the Phillips tract, was purchased by TNC and transferred to Prairie Township. The Phillips tract includes substantial reaches of McCoy Ditch and Hamilton Run. The tract is immediately downstream of the parcel that the Pleasant Prairie transmission lines might cross, and any stream restoration planning and implementation should be done coordinating among parcels and their owners. It is advantageous to maximize effectiveness (and limit costs) of any stream restoration on these two (and other) parcels by planning and implementing the stream restoration adequately and simultaneously across the entire reach from the railroad tracks to the north to US 40 and downstream.

Please see Anthony Sasson's email to you of March 9, 2021, about the potential Pleasant Prairie Solar transmission lines to the Cole Road substation and the Prairie Township conservation land along Hamilton Run and McCoy Ditch. These lines will affect the quality of any future stream restoration that

needs to be implemented along Hamilton Run and McCoy Ditch. Because habitat quality and aquatic life scores in these channelized streams as documented by Ohio EPA in 2014 denote low quality (<https://epa.ohio.gov/dsw/tmdl/SciotoRiver#122446489-biological--water-quality-reports-supplemental-information>), without stream restoration, these streams are likely to continue to have low scores as determined by Ohio EPA. Habitat quality is a major determinant of stream quality, as documented by Ohio EPA across Ohio. Stream restoration improves stream habitat quality and aquatic life scores.

We have attached the 1/26/2021 Darby Creek Association/Columbus Audubon letter to Josh Hreha of Invenergy/Pleasant Prairie Solar concerning environmental issues related to the proposed facility. Also attached is Invenergy's 3/19/21 response. In that document, on page 9 you'll see a reference to the proposed transmission lines that would connect to the Cole Road substation. It looks like, from the map seen in Invenergy's application to the Ohio Power Siting Board, that the transmission line might go to the north of the Prairie Township property. The line would then be on AEP Ohio Transmission property. Regardless, Prairie Township - and the Big Darby Accord and the general public - should have an interest because of the need to adequately plan and implement stream restoration along McCoy Ditch and Hamilton Run. Not doing so could mean permanently degraded sections of these streams because stream habitat quality and restoration is a major determinant of their condition.

In his April 9, 2021, email to you, Anthony Sasson attached some of the maps that were done in the early 2000s regarding the Phillips tract (now owned by Prairie Township) and the general area of Hellbranch Run and tributaries. The idea, along with the rest of the upper Hellbranch Run sub-watershed, was to restore stream habitat along these tributaries. Much of this has been done at places like Franks Park and Spindler Park in west Columbus, as well as along Clover Groff Run south of Broad Street. There are, we believe, at least 6 other stream segments that have been restored (stream channel and riparian habitat improvements) as part of the Big Darby Accord Watershed Master Plan. Hamilton Run and McCoy Run in the area of the Phillips tract were not restored. NRCS/USDA did add some constructed wetlands on the Phillips tract. Please note that these might complicate stream restoration because of limits created by the Wetland Reserve Program and wetland establishment that NRCS did. However, in the best interest of improving stream quality, hopefully NRCS would cooperate and allow the optimum stream restoration in that area.

Also, please note there is an environmental covenant recorded 7/13/2017 related to the Cole Road Station between Ohio Power Company and Ohio EPA. This covenant establishes areas for groundwater recharge mitigation and riparian setback requirements related to the stormwater permit for the Cole Road station. Contact Ms. Marshall Cooper of Ohio EPA for more information on this covenant. Please note that having a covenant or Wetland Reserve Program easement on a parcel does not constitute stream restoration, and might perpetuate stream habitat problems unless stream restoration is implemented, especially one that improves stream channel habitat conditions.

Part of McCoy Ditch downstream of Amity Road and upstream of the Prairie Township Philips tract also needs to be restored. The Franklin County Auditor lists adjacent properties for this section as as owned by New Frontier Real Estate and Ecological Resource Partners LLC.

Regardless of the precise route, this route and transmission line are especially important related to one of the main intents of the Big Darby Accord (<https://bigdarbyaccord.org/>) and acquisition of the Prairie Township parcel in 2002, to protect the riparian area along these streams and allow for well-planned and implemented stream restoration along each stream. The habitat along each stream now is in fair to

poor condition., and has not been improved since the 2002 acquisition. They are still channelized and entrenched, i.e., "ditch-like," which is a legacy of former agricultural use of the land. This is a degraded condition and limits and water quality scores these stream can achieve. This problem is also seen on the AEP Ohio Transmission land and along McCoy Ditch upstream to Amity Road. If this Pleasant Prairie Solar project is approved by the Ohio Power Siting Board, it is important that the transmission line minimize any impact to McCoy Ditch and Hamilton Run, and maximize the potential for stream restoration. For example, where transmission lines are overhead of a "restored" channel, trees are not allowed and the stream cannot be shaded. This is a significant degradation of the stream and hindrance to potential restoration, which means that these streams could be stuck in a perpetually low-scoring ecological condition. They also would be impacted by thermal effects of the lack of shade, a significant problem since recorded temperatures are rising. You can see this problem of the overhead transmission lines and lack of trees and shade downstream of US 40 along Hamilton Run at the Hellbranch Meadows parcel owned by the Franklin Soil and Water Conservation District. This leads to warmer stream temperatures and algal blooms, which stress fish and other aquatic life.

Transmission lines can limit stream restoration design and important components such as the route and tree shading over these streams. In short, the transmission line route needs to, including but not limited to:

- 1) minimize the transmission line crossing distance over any streams;
- 2) maximize the ability of the streams to meander when restored, on these parcels and near the transmission lines (This is best established with planning of the transmission lines in conjunction with stream restoration planning);
- 3) minimize restrictions that might be created by placement of the transmission line towers or other structures;
- 4) maximize tree shade over these streams, including an adequate distance in the riparian area along these streams (as wide as possible);
- 5) maximize infiltration of precipitation to groundwater through establishment of native vegetation in these parcels, which probably is forest in this area (and might include some wetlands), especially within the floodplain;
- 6) demonstrate coordination for maximizing stream restoration among parcels; and
- 7) confirmation of the above by a qualified and experienced stream restoration consultant/contractor, and review by the public.

The potential to restore these streams is an important part of the Big Darby Accord's intent and Ohio EPA and others' Total Maximum Daily Load (TMDL) efforts, and helps improve Hellbranch Run, McCoy Ditch and the Big Darby Creek. The DCA is very concerned about current and potential adverse and cumulative impact to Big Darby and tributaries. We encourage Prairie Township to intervene and ask the Ohio Power Siting Board to ensure transmission line planning that adequately protects Hamilton Run and McCoy Ditch concerning potential future stream restoration and assuring its highest quality.

The transmission line planning needs to take place first and optimize the potential for any future stream restoration. There is the potential for the transmission line to limit, and therefore negatively affect, future stream restoration.

The health of Big Darby and tributaries depends on foresight and in part well-planned stream restoration in this area, concurrent with any transmission line planning. Thank you for the consideration of these comments.

Sincerely,

AS/CS

Anthony Sasson
Charlie Staudt (Prairie Township resident)
on behalf of the Darby Creek Association
8351 Patterson Road
Hilliard, Ohio 43016
asasson@aol.com
614 519-9291

cc:

John Tetzloff, DCA
Charlie Staudt, DCA
Marshall Cooper, Ohio EPA
Kyle Wilson, Franklin SWCD
Matt Butler, OPSB
Josh Hreha, Invenergy

Attachments (2)



Darby Creek Association
Mr. John Tetzloff
President, Darby Creek Association

Columbus Audubon
Mrs. Allison Boehler

Mr. Tetzloff and Mrs. Boehler-

Thank you again for your letter regarding the proposed Pleasant Prairie Solar Project sited within/adjacent to the Big Darby Creek Watershed and MetroPark land. From an early development stage, the significance of this area from the perspective of core environmental stewardship and conservation tenets has been clear to Invenergy. Invenergy has positioned its initial project due diligence studies in a manner that allows for further coordination and alignment of the project with these tenets and the project team is looking forward to more coordination, collaboration, and input from the Darby Creek Association, Big Darby Creek Accord Advisory Panel, Columbus Audubon, and MetroParks.

One upcoming milestone for continued dialogue, would be Invenergy's Open House Event scheduled for April 9th, that Invenergy is working to finalize logistics for and send notice out to local stakeholders.

Please find the below initial responses to your letter, and we look forward to discussing further.

- 1) Wetlands: The facility should ensure adequate protection of wetlands, starting with a complete and proper Inventory and delineation of all wetlands, including temporary wetlands (Category I), and adequately protective buffers, adequate protection of wetland hydrology, preservation and enhancement of wetland wildlife, and connection to conservation land. We understand that as part of Clean Water Act obligations the facility will need to produce wetland identification, delineations and wetland scoring for the Army Corps of Engineers and Ohio EPA. We expect to have other protection points to follow. We expect that wetland impacts will be avoided to the greatest extent practicable, and that significant wetland enhancement might be possible, especially given the proximity to Battelle-Darby Metro Park.

Invenergy Response:

As part of our site evaluation, the Project team conducted a detailed survey of surface waters (wetland and waterbody delineations) within the Project Area in fall of 2020. This Report was provided as part of our Application to OPSB, see Exhibit C - part 5 of 25.

This report provides details on delineated features including their scoring on the ORAM or HHEI/QHEI assessment forms. A total of 15 wetlands and one pond were delineated during field surveys, for a total of 8.15 acres of wetlands within the Project Area. Eleven of these wetlands were categorized as emergent, three were categorized as forested, and one was categorized as shrub-scrub. One wetland (W-002) was categorized as potentially jurisdictional and scored as lower quality wetlands on the ORAM. No wetland crossings are proposed, and we anticipate no impacts to wetlands from the construction or operation of the Project based on our current design.

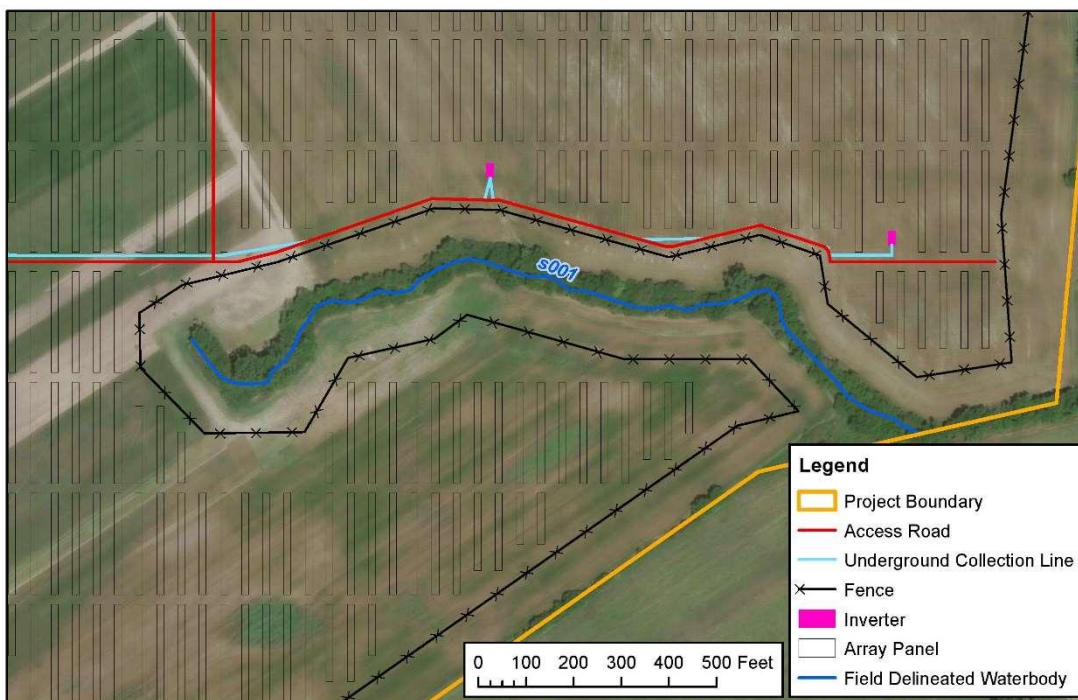
The Project has also developed a Landscape and Vegetation Management Plan (Exhibit E to the Certificate Application), that provides details on stabilization, and the planting of native, low-growing, herbaceous vegetation. This land cover will provide a greater diversity of species and will be maintained year-round, as opposed to seasonal disturbance of crop harvest, providing continuous ground covering and stabilization. This maintained ground cover will reduce runoff and sedimentation to local waterbodies in comparison to an agricultural field. As well as act as a vegetated buffer around the existing wetlands.

- Wetland Delineation:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B14842A02576.pdf>
- Landscape, Vegetation Management, and Lighting Plan:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B23047H02591.pdf>

- 2) Stream buffers: Protection of streams, including adequate buffers for both these and wetland habitats. We know that temperatures are increasing in Ohio, and we need to mitigate for this and ongoing climate changes impacts. For Foley Ditch, any other streams, and tributaries, we strongly encourage exceeding Ohio EPA general stormwater permit requirements for the Big Darby Creek watershed.

Invenergy Response:

As part of the surface water delineation, streams and ditches were identified and delineated within the Project Area. Only one stream was delineated (an unnamed tributary of Hellbranch) in the central west portion of the Project. The Project team anticipates no impacts to this stream from the construction or operation of the Project. The Project was sited to exclude this stream, keeping it and the vegetated buffer outside the project fence line with a setback of at least 100'. Project design does not extend beyond the current agricultural field, and the stream currently has a vegetated buffer that will not be disturbed.



During post-construction the Project will revegetate the entire area with native grasses and, in select areas (to be determined) a pollinator mix; this vegetative cover will be permanently maintained for the life of the Project (approximately 30 yrs) further reducing run off from the surrounding lands, in comparison to the current agricultural use.

These practices are used to reduce sediment movement and sedimentation during the construction phase. The Project SWPPP will incorporate the Big Darby Creek Total Maximum Daily Limit (TMDL) recommendations and

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appropriate stream buffers to reduce sediment runoff. The Storm-water system will also be maintained for the life of the Project.

- 3) Hydrology: Protecting and improving stream hydrology, including encouraging and restoring the site's infiltration to groundwater to help mitigate climate change and restore downstream stream quality, significantly exceeding the required Ohio EPA stormwater permit and enhancement and preservation of the adjacent parkland's natural conditions. Encourage groundwater recharge to the maximum extent possible and avoid lowering the water table.

Invenergy Response:

The Project will maintain the current site hydrology including existing drain tile, surface features, and ground water infiltration. The Project is obligated to not increase but maintain or improve site hydrology. As mentioned above, during construction and operation the Project will follow the State General NPDES permit requirements including Appendix A: Big Darby Creek Watershed requirements; the County Engineer approved storm-water management plan; and sediment erosion control plan. Post-construction, per the NPDES permit requirements, the Project will continue to maintain the site stormwater features within the Project Area controlling site hydrology for the life of the Project. See Sections 2.3.2 and 4.5 in the Ecological Assessment (Exhibit R) of the OPSB Application for additional details on permits and hydrology.

Also as mentioned above the site will be stabilized with native vegetation. With permanent maintained vegetation within the site, we anticipate potential for greater ground water infiltration and less runoff in comparison to the current agricultural use. A reduction in runoff will likely support improved local water quality.

- Ecological Assessment Report:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B30336F02627.pdf>

- 4) Native vegetation: Rather than the species list in the Ohio Pollinator Habitat Initiative, we encourage propagation of appropriate native vegetation, including the maximum use of local, appropriate, native plant species and avoidance of nonnative and/or Invasive species. We encourage acquiring plants first from Ohio

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native plant sources, with local genotypes, to the maximum extent practicable. On a related issue, please explain how the facility will use the MetroParks' Vegetation Management Plan, and identify deviations.

Invenergy Response:

The Project has crafted a detailed, preliminary vegetation management strategy (Exhibit E to the Certificate Application) which considered the OPHI scorecard information, MetroParks' Vegetation Management Plan, and early feedback from USFWS and ODNR. The plan relies on regionally appropriate plant species which will be compatible to those species present at MetroParks and establishes a plan to actively manage for invasive/undesirable plant species. The strategy will be refined to align with final Project design and seed availability, among other factors, and the Project will continue to coordinate with MetroParks and other appropriate stakeholders on the plan to ensure compatibility and value added to the project and surrounding area. Please let the Pleasant Prairie Solar Farm Project team know if there are specific personnel at MetroParks we can follow up on this item with further.

- Landscape, Vegetation Management, and Lighting Plan:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B23047H02591.pdf>

- 5) Bird impacts: We understand the facility will have to address Endangered Species Act and Migratory Bird Treaty Act requirements. Beyond these, we expect the facility to address how it will avoid bird impacts, including at Battelle-Darby Metro Park and adjacent and nearby stopover/resting areas.

Invenergy Response:

The Project has coordinated with the U.S. Fish and Wildlife Service (USFWS) and Ohio Department of Natural Resources (ODNR) as part of the site evaluation and design; see Appendix B & C in the Ecological Assessment in our OPSB Application (Exhibit R – parts 2 and 3). Both agencies determined the Project would not have an adverse impact on Endangered species or Migratory Birds. The Project is sited entirely within active agricultural land generally adjacent to park land, and will not encroach on habitats associated with the park. The Project fencing will not affect bird access to the Project area and the permanent

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vegetation within the Project will provide greater diversity of plant species and provide year-round forage area for birds and other wildlife. Additionally, Project operation and maintenance activities will primarily be limited to the Project access roads further limiting the disturbance as compared to the current agricultural use. There is additional information on wildlife including birds in Section 4.1 of the Ecological Assessment in our Application (see Exhibit R).

- Ecological Assessment Report:

<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B30336F02627.pdf>

- 6) Minimizing encroachment on Battelle-Darby MetroPark, including adequate setbacks (exceeding minimum setbacks required by the Ohio Power Siting Board) and parcel crossings.

Invenergy Response:

The Project fence line is set back a minimum of 100 feet from the property boundary and is in the active agricultural area, the Project does not encroach outside the active agricultural fields, and there will be a vegetated buffer between the fence line and the property boundary. Therefore the Project will reduce the current encroachment on Battelle-Darby MetroPark. Further, the Project team is open and ready to discuss setbacks and landscape screening schemes or components with Metroparks and other adjacent neighbors to work to incorporate appropriate design input into the project. Please let the Pleasant Prairie Solar Farm Project team know if there are specific personnel at MetroParks we can follow up on this item with further.

- 7) Aesthetic impacts, Including those to the park and other neighbors through practices like adequate setbacks (and beyond those required by Ohio solar facility rules) and native plant perimeters and buffers (especially native species "hedgerows" as buffers). We encourage avoiding conifers that will conflict with the aesthetic of the region.

Invenergy Response:

The Project conducted a detailed Viewshed Analysis as part of the OPSB Application (See Exhibit J). This analysis, using the maximum height of the

panels and the current setbacks, determined where the Project is visible and potentially visually sensitive resources in and around the Project Area (up to 10 miles), as well as potential visual impacts resulting from the construction and operation of the Project. This report also included renderings of the Project, showing existing conditions, project components post-construction and Project 5-7 years post construction showing the vegetative screening. The Landscape and Vegetation Management Plan (Exhibit E of the OPSB Application) shows details on the proposed vegetation that will be utilized for perimeter and buffers. The Project is committed to using native plantings throughout the Project. Please let the Pleasant Prairie Solar Farm Project team know if there are specific adjacent or nearby stakeholders we can follow up on this item with further to coordinate on items such as, but not limited to: setbacks, and landscape screening, and other design input.

In addition to the Viewshed analysis, prior to starting Cultural Resource Surveys- which involve historic structures and architecture, a work plan was submitted to the Ohio SHPO for review and approval. The approved work plan was then followed for archaeological and architectural investigations. The Architectural report was submitted to both the OPSB and OH SHPO for review as part of our application (Exhibit H of the OPSB Application).

Prior to construction and based on results from SHPO's review, a Memorandum of Understanding (MOU) will be developed that will further codify commitments to avoid or screen resources as appropriate.

- Viewshed Report
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B23945D02603.pdf>
- Historic Cultural Resources Report
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B23325A02595.pdf>

- 8) Parkland conservation planning and trail connections: Include planning with local parkland administrators concerning protected conservation land and corridors to present and future adjacent and nearby conservation areas. Assure public trails and trail connections from Battelle-Darby Metro Park to public conservation land to the east are included in facility planning. Work with Metro Parks and other stakeholders and consider future conservation land needs.

Invenergy Response:

The proposed Project is being developed exclusively on private property and will not impact any existing public trails. The Project is setback a minimum 100 feet from project property boundaries and would not encroach or bisect any existing public trails or access to the Metropark. Please let the Pleasant Prairie Solar Farm Project team know if there are specific personnel at MetroParks we can follow up on this item with further.

- 9) Wildlife: We request that fencing be wildlife-friendly and aesthetically appealing. The facility should avoid and/or minimize wildlife impacts from facility lighting.

Invenergy Response:

The fence is a safety and security feature and since there is energized equipment within the fence the NEC code requires the Project use and maintain such safety fencing around the perimeter to prevent unauthorized access. The Project team will evaluate different types of fencing options including 'deer fence' for use around applicable Project infrastructure.

Additionally, the Project fenced area is broken down into smaller groups and only encompasses project infrastructure not wooded areas or other areas outside the predominantly agricultural fields being utilized. We anticipate minor to no impacts to wildlife, as any wildlife displaced from the fenced area (currently predominately agricultural fields) are not habitat limited in the area as there are adequate equivalent habitat adjacent to the Project Area. Additionally, permanent ground vegetation within the fenced areas will potentially increase forage habitat for certain species including small mammals, insects, and certain bird species.

Per the Project's conceptual lighting plans found within Exhibit E of the Application, lighting is proposed to be limited to access and safety areas near the project substation and will be motion activated and downlit.

- Landscape, Vegetation Management, and Lighting Plan:
<http://dis.puc.state.oh.us/TiffToPDF/A1001001A21B19B23047H02591.pdf>

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10) Transmission lines: We request minimizing impacts of transmission lines on the proposed crossing of conservation land protected through the Clean Ohio Fund north of US 40. This land is owned by Prairie Township. Any lines should minimize stream crossings, the prevention of forest growth, the loss of protected conservation land and the potential for reducing potential stream restorations of Hamilton Run and McCoy Ditch.

Invenergy Response:

The Project has not finalized the conceptual transmission line design, and is still evaluating structure placement and spans within various transmission routes. However, the Project team had a meeting with the Ohio EPA on this topic on 12/29/2020 to discuss conservation easements in the area. The Project is committed to avoiding placing structures in FEMA flood zones and within conservation easements to avoid impacts in and around these sensitive areas. As mentioned previously, the Project will be required to abide by the State NPDES general permit including Appendix A additional Big Darby Creek Watershed requirements. Once the transmission line design is completed Pleasant Prairie will share this information with Metroparks and other Project stakeholders and would be happy to discuss any concerns.

Invenergy is looking forward further engaging on these topics, the environmental and economic benefits of the proposed project, and other design elements with you and other local stakeholders. Please contact me directly with any further questions.

Regards,
The Invenergy Pleasant Prairie Solar Energy Team
Josh Hreha- Lead Developer
jhreha@invenergy.com
773-808-2145



To: Josh Hreha, Project manager, Invenergy
From: Darby Creek Association and Columbus Audubon
Subject: Communication regarding proposed Pleasant Prairie Solar Project
Date: January 26, 2021

Dear Mr. Hreha:

During the conference calls of December 8 for the Big Darby Accord Advisory Panel and December 14 public meeting, you responded affirmatively to a request for an Invenergy commitment to working with local environmental organizations to address environmental concerns related to the proposed Pleasant Prairie Solar Project in Franklin County, adjacent to Battelle-Darby Metro Park and in the Big Darby Creek National and State Scenic River watershed. The Darby Creek Association (DCA) and Columbus Audubon are following up on that and requesting regular communications, meetings and a commitment to work through at least the following preliminary list of those concerns, with additions and follow-up as needed to address these concerns and others that might arise. Please note this is not a complete list.

Please note that we would like to have a continuing dialogue.

Our overarching concerns are the protection and enhancement of Big Darby Creek and tributaries; protection and enhancement of wildlife and native vegetation within and adjacent to the proposed facility; and avoiding and minimizing impacts to Battelle-Darby Metro Park.

DCA and Columbus Audubon concerns include the following:

- 1) Wetlands: The facility should ensure adequate protection of wetlands, starting with a complete and proper inventory and delineation of all wetlands, including temporary wetlands (Category I), and adequately protective buffers, adequate protection of wetland hydrology, preservation and enhancement of wetland wildlife, and connection to conservation land. We understand that as part of Clean Water Act obligations the facility will need to produce wetland identification, delineations and wetland scoring for the Army Corps of Engineers and Ohio EPA. We expect to have other protection points to follow. We expect that wetland impacts will be avoided to the greatest extent practicable, and that significant wetland enhancement might be possible, especially given the proximity to Battelle-Darby Metro Park.
- 2) Stream buffers: Protection of streams, including adequate buffers for both these and wetland habitats. We know that temperatures are increasing in Ohio, and we need to

mitigate for this and ongoing climate changes impacts. For Foley Ditch, any other streams, and tributaries, we strongly encourage exceeding Ohio EPA general stormwater permit requirements for the Big Darby Creek watershed.

- 3) Hydrology: Protecting and improving stream hydrology, including encouraging and restoring the site's infiltration to groundwater to help mitigate climate change and restore downstream stream quality, significantly exceeding the required Ohio EPA stormwater permit and enhancement and preservation of the adjacent parkland's natural conditions. Encourage groundwater recharge to the maximum extent possible and avoid lowering the water table.
- 4) Native vegetation: Rather than the species list in the Ohio Pollinator Habitat Initiative, we encourage propagation of appropriate native vegetation, including the maximum use of local, appropriate, native plant species and avoidance of nonnative and/or invasive species. We encourage acquiring plants first from Ohio native plant sources, with local genotypes, to the maximum extent practicable. On a related issue, please explain how the facility will use the MetroParks' Vegetation Management Plan, and identify deviations.
- 5) Bird impacts: We understand the facility will have to address Endangered Species Act and Migratory Bird Treaty Act requirements. Beyond these, we expect the facility to address how it will avoid bird impacts, including at Battelle-Darby Metro Park and adjacent and nearby stopover/resting areas.
- 6) Minimizing encroachment on Battelle-Darby Metro Park, including adequate setbacks (exceeding minimum setbacks required by the Ohio Power Siting Board) and parcel crossings.
- 7) Aesthetic impacts, including those to the park and other neighbors through practices like adequate setbacks (and beyond those required by Ohio solar facility rules) and native plant perimeters and buffers (especially native species "hedgerows" as buffers). We encourage avoiding conifers that will conflict with the aesthetic of the region.
- 8) Parkland conservation planning and trail connections: Include planning with local parkland administrators concerning protected conservation land and corridors to present and future adjacent and nearby conservation areas. Assure public trails and trail connections from Battelle-Darby Metro Park to public conservation land to the east are included in facility planning. Work with Metro Parks and other stakeholders and consider future conservation land needs.
- 9) Wildlife: We request that fencing be wildlife-friendly and aesthetically appealing. The facility should avoid and/or minimize wildlife impacts from facility lighting.
- 10) Transmission lines: We request minimizing impacts of transmission lines on the proposed crossing of conservation land protected through the Clean Ohio Fund north of US 40. This land is owned by Prairie Township. Any lines should minimize stream crossings, the prevention of forest growth, the loss of protected conservation land and the potential for reducing potential stream restorations of Hamilton Run and McCoy Ditch.

We know there are many OPSB, Clean Water Act, etc., requirements related to the above, although we are asking for additional efforts beyond minimum requirements. DCA and Columbus Audubon asks for continuous public engagement with Invenergy, in order to adequately address these concerns. This would include regular communication and working meetings and be beyond that required by the Ohio Power Siting Board.

Thank you for your time and consideration. Please contact Anthony Sasson at 614-519-9291 to set up a meeting to discuss the above in more detail.

Sincerely,

John Tetzloff, President Darby Creek Association
614-288-0313
jtetzloff@aol.com

Allison Boehler, Columbus Audubon

From: jftetzloff@aol.com,

To: info@pleasantprairiesolar.com, aboehler67@gmail.com, palusjim@gmail.com, shumar.3@osu.edu, jgordon2211@gmail.com, darterland@yahoo.com, terrys744@gmail.com, moloney@metroparks.net, kasnyik@metroparks.net, boose@metroparks.net, morrow@metroparks.net, asasson@aol.com, ashleyhoye@hotmail.com,

Subject: Comments regarding Pleasant Prairie Solar Farm

Date: Fri, Jan 29, 2021 3:49 pm

Attachments: DCA Audubon letter.pdf (104K)

Mr. Hreha,

The Darby Creek Association and the Columbus Audubon Society would like to jointly submit the attached comments regarding the proposed Pleasant Prairie Solar Farm for your consideration.

Please contact Anthony Sasson (DCA) or Allison Boehler (CAS) for questions or further discussion. I believe you have their contact information, but if not it is contained in the letter.

Thank you for your time and consideration.

John Tetzloff
President, Darby Creek Association
614-288-0313

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 20-1679-EL-BGN

Summary: Public Comment of Concerned citizens, via website, electronically filed by
Docketing Staff on behalf of Docketing