

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: comment for 21-0277
Date: Monday, July 12, 2021 8:16:33 AM

Good afternoon. I have reviewed the studies submitted with case #21-0277 regarding the solar installation proposal in Cass Township, Hancock County, Ohio. I have several concerns.

Drainage Tile Assessment:

Hancock County has so many issues with flooding already. When we receive a heavy rain, the creek near the corner of Township Road 238 and County Road 109 always floods and often times floods across the road. If you change any of the water runoff from the project land to be rerouted to neighboring land, you will be making the issue worse. I believe our previous mayor is a member of the Ohio Power Siting Board. She is well aware of the major flooding issues we have in our area.

Visual Impact Analysis:

This study is biased and contains flaws. In section 2.2 of this study, it states that the two collector stations, collector lines, and an operations and maintenance building are not considered the focus of the visual impact analysis. These items are new additional items to the visual landscape of Cass Township and will impact the residents and passersby. This appears to be a gap in their analysis. This study breaks the residents up into viewer groups. One of the viewer groups is "Local Residents". The study basically says in section 3.3 that rural residents will be more sensitive to changes since they are accustomed to views of the natural surroundings. This is absolutely true. I purchased a home in the country because I wanted unobstructed views of nature and plants. I am very upset that the view will be changed from nature to industrial. This study doesn't take into account any of the residences that are the first in the "line of sight" of the new installations. I live at 16319 County Road 109 and I will have a direct line of sight to the panels. No consideration was taken in this study for the changes in the view from my property. The study location site referred to as VP-10 County Road/Residence is the house at the corner of County Road 109 and Township Road 247. This is 1.1 miles from the project. I'm located on County Road 109 but I'm 5 houses closer to County Road 238 or the project site. By not choosing the closest residence, it appears the results are being skewed to be bias towards the project. This is a gap in the analysis. It should be redone or considered invalid. The outcome of the study was that the visual impact would be "weak – the contract can be seen but does not attract attention." This simply is not true when you consider the number of homes that will be impacted. This project will definitely draw the attention of anyone living or driving by.

History/Architecture Survey:

As stated in the Abstract "the solar panels will not exceed 12-feet in height" but in section 2.2 of the Visual Impact Analysis study it says "At their maximum height (when tilted vertically) the panels are expected to be approximately 15 feet tall." The historical study was given incorrect specifications and is therefore not valid. Also the Abstract portion of the History/Architecture Survey states that there will be a substation with lighting that may be 50-feet in height. That's over 4 stories high. That structure is not considered in the Visual Impact Analysis document either.

US Wildlife Service and ODNR:

Although we don't have endangered fish or birds in the area, we do have a significant deer population. This project is required by electrical code to be enclosed in a 6' high fence. Based on the question and answer session held on the 5/13/21 public meeting virtual call, this fencing will be a chain link fence with potential barbed wire across the top. Because this project will take up 1,356 of the total 15,360 acres in Cass Township, all those deer will be forced to live in a substantially smaller area. This will mean an increase in the amount of crop damage to the remaining farmers. This is also a huge loss of habitat for all of our medium to large size wildlife.

Acoustic Assessment:

We have no industrial or motorized items in our neighborhood. We have no factories close by. We have traffic and a few trains. Introducing motorized tracking solar panels will be noticeable and unwanted noise to the residents of Cass Township.

Glare Hazard Analysis:

This is one of my biggest concerns. Being within approximately 150 yards of the panels, I am worried that I won't be able to enjoy the outdoors on my property during certain times of the day or certain times of the year based on sun movement. The study only used the observation point listed as County Road 109. Without taking into account the effects of glint and glare on individual properties, how can it be determined for sure that we don't fall into the category of yellow or red glare (level associated with retinal damage)? My family's ocular health matters. Please turn down this project or have the study use all homes in close proximity to the project.

Horizontal Directional Drilling Release:

In addition to the destruction of farmland and the negative visual impacts to the natural landscape, this project will also use Horizontal Directional Drilling or HDD. As stated in section 2.0, "The conduit crossings for wetlands, streams, and roadways may need to utilize the HDD method during installation. Ideally, the HDD method involves no disturbance of the bed or bank of the water body being crossed. However, if a natural fracture or unconsolidated area in the ground is encountered, an inadvertent release of drilling mud or surface fluid discharge ("SFD") to the environment could occur." It was not mentioned on the informational call with the public that HDD methods would be used. The effects of a release of drilling mud would mean the potential for pollution to "waters of the state." This project will have access to and cross several streams, ditches, and tiles. This would mean a release of bentonite-based drilling fluid. If the streams are contaminated, this would harm wildlife such as deer. This could also lead to the pollution of our personal wells. The potential for contamination is not worth the risk. This risk was not fully disclosed to the public.

Vegetation Management:

On the public informational call on 5/13/21, it was stated that the facility would be maintained and mowed. In section 3.2 of this study it states "Mowing activities generally occur one or two times during the growing season to ensure the vegetation does not pose a risk to the Project equipment." This poses a major concern. What type of risk is there if the plants get too high? Are dry grasses within the project fence a fire hazard? Besides changing our views to chain link fence and barbwire, we will also have to look at tall weeds and grasses. If maintenance of vegetation is done to lower risk, why is it only twice a growing season? They clearly state in this document that they don't intend to monitor the vegetation closely. Plant growth rates change drastically based on weather. If

these are only monitored twice a growing season, it seems like something that they know is a risk, isn't going to be monitored in a manner that protects the public.

Manufacturer Specifications:

This study shows four different types of solar tracking systems that they are considering. They include NX Horizon, NexTracker, FTC Solar and Array Technologies. Each of the first three only have a 10-year structural, and a 5-year drive and control component warranty. The last system, Array Technologies, has no warranty listed. This project is set to be in place for 30 years yet the main equipment has a fraction of that timeframe as their warranty. This is not a viable 30 year project.

Preliminary Decommissioning Plan:

Section 2.2 states that "all infrastructure will be removed down to 36 inches below the ground surface." What happens to the remaining infrastructure below that depth? These panels will be installed on pile driven concrete pillars. Sooner or later the remainder of those piles that are below 36" will rise with the freeze/thaw cycles. Returning the land to farm use with the potential for excessive number of concrete chunks would make it difficult for any farmer to make this farmland again. It would damage their equipment. Also, since this project will be using HDD methods, will the conduits installed with HDD methods be removed? This poses a risk of future leftover drilling mud to leak into the environment. It also says that not all items will be removed. This is concerning. It states "Structures not owned by Galehead Development at the time of decommissioning (e.g., interconnection facilities and other similar utility facilities) shall remain in place as agreed upon between the structure's owner and the property owner." It also states that removed material will be taken off site for recycling. Solar projects of this scale have only been installed for 20-30 years. We are just starting to see large solar projects come to the end of their project life. We don't have recycling facilities that can adequately handle the recycling of solar panels. If recycling isn't nearby, these items will end up in our landfills thus furthering our concerns.

Economic and Fiscal Impact Assessment:

As stated in section 2.1, "Hancock County encompasses 531 square miles, with land in farms accounting for approximately 71 percent of the total area (U.S. Census Bureau 2021a, U.S. Department of Agriculture 2019)." I would argue that a good portion of Hancock County is covered by the city of Findlay therefore Cass Township which is rural has a higher percentage of land in farming use. Cass Township is 24 square miles or 15,360 acres. If 71% of the total acres is farmland, that would be 10,906 acres. For a conservative estimate, that means that Cass Township will be losing 12% of the available farmland at a minimum (1356 project acres/10,906 total farm acres). This is not a viable option. When population numbers and global incomes continue to rise, the demand for food production rises. This study also states "The state of Ohio had a total estimated population of 11.69 million in 2019. The statewide population has been slowly growing since the turn of the millennium, increasing by about 1.6 percent from 2000 to 2010, and by a further 1.3 percent from 2010 to 2019 (U.S. Census Bureau 2020a, 2021b)." This land will be in solar use for 30 years. If we use a conservative 1.3% growth rate for the state of Ohio, that means that in 2028 we will have 11,401,070 residents. By 2037, we will have 11,743,102 residents or an increase of 342,032 people just in the state of Ohio. We need to leave our farmland as farmland for our future

food production needs.

Tourism: Lastly, we are located near the Van Buren State Park. The main reason people choose to camp and visit this park is because it's quiet and located in a completely rural setting. This project will undoubtedly have a negative change on the amount of tourists that visit our area.

Renewable Energy Credits (RINs):

The reason that this project is financially viable is that they can sell their kilowatts to companies that need the renewable energy credits. This allows the electricity to be sold for a premium. We have no need for a solar plant to create RINs. Poet Ethanol LLC has a strong presence in our area already. They are a large purchaser of corn from the area. When we leave the land as farmland, the corn can still be used in a green energy solution. To exchange one renewable credit (ethanol) for another (solar) doesn't make sense. We don't need this solar facility.

Conclusion: Please consider the gaps in the analysis and reject their application. I don't want to see this facility installed. Thank you for your time in reading and considering my objections to this project.

Thank you,
Jennifer Schroeder

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Summary: Public Comment of Jennifer Schroeder , via website. electronically filed by
Docketing Staff on behalf of Docketing