

**BEFORE THE OHIO POWER SITING BOARD**

|                                                    |   |                                |
|----------------------------------------------------|---|--------------------------------|
| <b>In the Matter of the Application of</b>         | ) |                                |
| <b>Sycamore Creek Solar, LLC for a Certificate</b> | ) | <b>Case No. 20-1762-EL-BGN</b> |
| <b>of Environmental Compatibility and</b>          | ) |                                |
| <b>Public Need.</b>                                | ) |                                |

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**DIRECT TESTIMONY OF MARK J. BONIFAS**

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

**A.1.** My name is Mark J. Bonifas. I am a Principal Engineer at Hull & Associates, Inc. (“Hull”). My business address is 6397 Emerald Parkway, Suite 200, Dublin, OH 43016.

**Q.2. What are your duties as a Principal Engineer?**

**A.2.** As a Principal Engineer, I manage civil engineering, renewable energy, and land development projects in multiple states providing creative strategies to secure funding, meet regulatory requirements, and streamline the due diligence, design, permitting, and construction phases of a project. I manage multi-disciplinary teams, interact with local and state agencies, and lead environmental assessments, remedial actions, and permitting and engineering design for infrastructure at large commercial and industrial sites. I am part of our business development team that focuses on the energy, environmental, and infrastructure markets. Our clients include public and private clients in the energy, healthcare, retail, office, recreational, ecological restoration, commercial, mixed-use, and industrial markets. I also provide technical engineering support for Hull’s Dublin, Ohio and other offices. I have managed multiple environmental and engineering studies that support Ohio Power Siting Board (“OPSB”) applications for wind and solar projects and have managed design and construction activities for wind and solar projects that have been approved by the OPSB.

1   **Q.3.   What is your educational and professional background?**

2       **A.3.**   I have a Bachelor of Science in Civil Engineering from the Ohio State University  
3       and have been practicing engineering as an engineering consultant for 33 years. I have  
4       been a registered Professional Engineer in Ohio for 28 years and I am also a registered  
5       Professional Engineer in 15 other states. I have been performing civil engineering services  
6       on renewable energy projects for over ten years.

7   **Q.4.   On whose behalf are you offering testimony?**

8       **A.4.**   I am testifying on behalf of the Applicant, Sycamore Creek Solar, LLC  
9       (“Applicant”), in support of its Application filed in Case No. 20-1762-EL-BGN.

10  **Q.5.   What is the purpose of your testimony?**

11       **A.5.**   The purpose of my testimony is to describe studies my firm undertook on behalf of  
12       the Applicant, to summarize the results of those studies, and to provide my assessment of  
13       traffic impacts of the Sycamore Creek Solar Project (“Project”). Additionally, I have  
14       reviewed and will address the Project Drain Tile Mitigation Plan which was attached to the  
15       Application as Exhibit E. I have also reviewed and will summarize the result of the  
16       decommissioning cost estimates submitted by the Applicant, which is summarized in  
17       Appendix A to Exhibit N of the Application (Decommissioning Plan), and provide my  
18       assessment of decommissioning activities with regard to the Project. Finally, I have also  
19       reviewed the Joint Stipulation filed on September 22, 2021 and will be providing testimony  
20       in support of Conditions 20 and 28.

21  **Q.6.   Please describe the studies that you and your firm undertook on behalf of the**  
22  **Applicant.**

1       **A.6.**   Hull undertook a Route Evaluation Study of the Project to evaluate the anticipated  
2       impact of the construction of the Project on roads and bridges and any needed  
3       improvements prior to construction or likely repairs needed following construction. The  
4       Route Evaluation Study also evaluated the need for any transportation-related permits and  
5       the potential impact on local traffic. A copy of that study is included in the Application as  
6       Exhibit M.

7       **Q.7.   What were the conclusions of the Route Evaluation Study?**

8       **A.7.**   It concluded that sufficient infrastructure exists via Interstate, State, and local roads  
9       to construct the Project. While a final delivery route has not been finalized, it is likely that  
10      delivery of Project components to the Project Area will be from the north by way of US 30  
11      to SR 98 to SR 602 that is adjacent to the east boundary of the majority of the Project Area.  
12      Within the Project Area, State, county, and township roads and new private gravel access  
13      roads will likely be used to deliver equipment and materials. The Route Evaluation Study  
14      concluded that all the roads reviewed can be utilized for equipment delivery and  
15      construction traffic.

16      The Route Evaluation Study also concluded that the vast majority of the vehicles  
17      transporting construction equipment, materials, and workers are expected to be of legal  
18      weight and dimensions. Some limited components such as switchgear or transformers for  
19      switchyards and substations may require the use of oversize/overweight vehicles. In the  
20      event oversize/overweight loads are necessary for construction, the Applicant will obtain  
21      special hauling permits for these oversize/overweight vehicles from the Ohio Department  
22      of Transportation or from the applicable local authority.

1 Finally, the Route Evaluation Study concluded that the traveling public is likely to  
2 experience, at most, minor delays and inconveniences during the construction of the  
3 Project. Because this is an agricultural area, heavier use of roadways by local farmers  
4 during planting and harvest seasons will occur. Additionally, a Traffic Control Plan that  
5 describes the procedures that will be used to manage traffic during construction was  
6 included as part of Exhibit M of the Application. Prior to construction, the Traffic Control  
7 Plan will be finalized and submitted to Ohio Power Siting Board Staff, and it will also be  
8 shared with local law enforcement, schools, and local landowners.

9 **Q.8. What is your overall assessment of the potential traffic impacts of the Project?**

10 **A.8.** Based on the results of the Route Evaluation Study and my experience, I would not  
11 expect the construction or operation of the Project to have a negative effect on the traveling  
12 public. I would also not expect the construction or operation of the Project to have a  
13 negative effect on the condition of the local roadways.

14 **Q.9. Will the Applicant be required to obtain any transportation permits?**

15 **A.9.** Yes. Although very few are anticipated, the Applicant will obtain all necessary  
16 transportation permits prior to commencing construction. The Applicant will also  
17 coordinate with appropriate authorities regarding necessary traffic control during  
18 construction.

19 **Q.10. How will the Applicant protect and, if necessary, repair drain tile in the Project Area?**

20 **A.10.** As further explained in Exhibit E of the Application (Drain Tile Mitigation Plan),  
21 the Applicant coordinated with the Crawford County Engineer, the Crawford County Soil  
22 and Conservation District, and private landowners to identify available data for drain tile  
23 systems and will continue to do so. Data obtained from these efforts was compiled and

provided to the Ohio Power Siting Board (“OPSB”) as Appendix A to Exhibit E of the Application (Drain Tile Map) as the First Supplement to the Application on April 8, 2021. Under the Drain Tile Mitigation Plan, drain tile mains will be considered in the development of the final Facility layout and will be avoided to the maximum extent practicable, and to the extent they cannot be avoided, the Applicant has committed in the Application that any drain tile mains damaged during construction will be identified, documented, and repaired. All repairs will be completed by a qualified contractor within 30 days of discovery of the damage. Further, the Drain Tile Mitigation Plan ensures that no adverse impacts to drain tile systems extend outside the Project Area. Any agreement between the Applicant and a landowner that does not necessitate the repair of damaged drain tile will only be given effect to damaged drain tile located entirely on the landowner’s land. Examples of drain tiles that may not be repaired are lateral drain tile lines that are entirely within the Facility boundary which function to remove water from existing fields to the drain tile mains. That function is not necessary for a solar facility as ground water can migrate naturally into the soil. That is why lateral drain tile lines that are damaged and contained within the Project Area may not be repaired, depending on the need to replace the lateral drain tile lines and subject to individual landowner agreements previously negotiated during the leasing process. Repairs will be performed in accordance with the guidance provided in Appendix B of the Drain Tile Mitigation Plan.

**Q.11. How will the Project be decommissioned?**

**A.11.** The Applicant included Exhibit M (Decommissioning Plan) as part of its Application. Exhibit M includes details on decommissioning activities, site restoration, cost estimates, and financial assurance. The Applicant will notify the OPSB Staff 30 days

1 prior to the commencement of decommissioning activities. In general, decommissioning  
2 activities will involve the removal of all system components such as panels, weather  
3 stations, inverters, electrical equipment, racking, scrap, foundation piles, access roads,  
4 electrical collection lines, fencing, and the substation. Depending on circumstances and  
5 landowner agreements, some components may remain in place, such as electrical collection  
6 lines buried at least 48 inches underground, the substation if other agreements necessitate  
7 its continued use, and access roads, if approved by the landowner. Equipment removed  
8 from the site will be salvaged or recycled to the greatest extent practicable. Otherwise, it  
9 will be disposed of via a licensed solid waste disposal facility.

10 Following the completion of decommissioning activities, the site will primarily be  
11 converted back to pre-construction land uses. Land will be graded and decompacted to  
12 allow for agricultural use. For areas not to be returned to agricultural use, soils will be  
13 decompacted and reseeded to establish adequate vegetative cover. Topsoil conditions will  
14 be assessed to identify necessary topsoil additions or redistribution across the site to ensure  
15 productivity. The Decommissioning Plan states that the decommissioning process,  
16 including the removal of materials and site restoration, will last approximately 12 to 18  
17 months.

18 **Q.12. What is the projected cost of decommissioning?**

19 **A.12.** The Applicant included a Decommissioning Estimate to the Decommissioning  
20 Report (Appendix A to Exhibit M) early in project design to provide a preliminary estimate  
21 of the cost of full decommissioning, restoration of the Project Area, and proper disposition  
22 of all Project components. The cost of decommissioning the Project, without regard to

1 salvage value, was estimated to be approximately \$10,141,950. The Applicant will prepare  
2 a revised estimate based on the final Project design prior to obtaining financial security.

3 **Q.13. Please explain the financial security that will be put into place for decommissioning.**

4 **A.13.** Per Condition 29, the Applicant will post a performance bond based on the total  
5 costs of decommissioning, without regard to salvage value, prior to the commencement of  
6 construction of the Project. The decommissioning financial assurance mechanism will be  
7 set up so that the Applicant is the principal, the insurance company is the surety, and the  
8 OPSB is the obligee.

9 **Q.14. Do you believe the decommissioning plan is acceptable?**

10 **A.14.** Yes. In my experience, the plan, as outlined in the Application and Exhibit M, will  
11 ensure appropriate decommissioning of the Project so that the Project Area can be returned  
12 to another use after the end of the Project's useful life. Given the relatively low impact of  
13 a solar farm compared to the impact of other forms of electricity generation,  
14 decommissioning of the Project should not be a significant impediment to future uses of  
15 the Project Area, including a potential return to agricultural use.

16 **Q.15. Do you support Condition 20 of the Joint Stipulation?**

17 **A.15.** Yes. The Applicant has committed in the Application that any main drain tiles  
18 damaged during construction will be identified, documented, and repaired (Drain Tile  
19 Mitigation Plan, Appendix A to Exhibit E of the Application). Additionally, Joint  
20 Stipulation Condition 20 imposes a similar requirement that the Applicant avoid or  
21 minimize damage to functioning field tile drainage systems and soils resulting from the  
22 construction, operation, and/or maintenance of the Project in agricultural areas and to  
23 promptly repair any damaged drain tile systems at the Applicant's expense. Further,

1 Condition 20 not only requires the Applicant to promptly repair any damage to drain tile  
2 in the Project Area, but to also promptly repair drain tile in the Project Area to protect the  
3 field tile system of an adjacent landowner if the adjacent landowner's drain tile system is  
4 affected by the drain tile system in the Project Area. As noted above, lateral drain tiles,  
5 which function to remove water from existing fields to the main tiles, may not be repaired  
6 because ground water in the Project Area would migrate naturally into the soil. That is  
7 why lateral drain tile lines that are damaged and contained within the Project Area may not  
8 be repaired, subject to Condition 20 and individual landowner agreements previously  
9 negotiated during the leasing process.

10 **Q.16. Do you support Condition 28 of the Joint Stipulation?**

11 **A.16.** Yes. This condition will ensure that the Applicant obtains all necessary  
12 transportation permits prior to commencing construction. The Applicant will also  
13 coordinate with related agencies, such as the county engineer, the Ohio Department of  
14 Transportation, local law enforcement, and health and safety officials, regarding the  
15 construction and operation of the Project. This coordination will be described in the final  
16 transportation management plan submitted to Staff prior to the preconstruction conference.  
17 The condition also directs the applicant to repair any damages to public roads, culverts and  
18 bridges to their previous or better condition and remove temporary improvements (unless  
19 requested otherwise by the appropriate regulatory authority). Overall, this condition will  
20 ensure minimal delays with regard to local traffic related to the construction and operation  
21 of the Project and safeguard roadways in the Project Area.

22 **Q.17. Does this conclude your direct testimony?**

23 **A.17.** Yes, it does.

### **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic on September 24, 2021.

/s/ Anna Sanyal  
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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/24/2021 1:46:09 PM**

**in**

**Case No(s). 20-1762-EL-BGN**

Summary: Testimony Direct Testimony of Mark Bonifas electronically filed by Ms. Anna Sanyal on behalf of Sycamore Creek Solar, LLC