

February 17, 2022

Subject: Opposition to proposed Harvey Solar 1 project (#21-0164-EL-BGN) in Hartford and Bennington Townships in Licking County, OH

Primary Opposition- Negative impact of the proposed project on wildlife species and biological diversity

Dear OPSP Appointees,

The proposed Harvey Solar 1 project (#21-0164-EL-BGN) in Hartford and Bennington Townships in Licking County will not be beneficial for our community. It will cause harm to the residents, flora and fauna located here, and negatively impact our economic and ecological systems. Below are some of the reasons I am **OPPOSED** to the Harvey Solar project: Soon you will be ruling about approving an approximately 2800 acre solar project proposed by Open Road Renewables through Harvey Solar in Parts of Hartford and Bennington Townships in Licking County Ohio. This project is on your docket as Harvey Solar I Project (#22-0164-EL-BGN), and is currently one of the largest proposed projects in Ohio. It is also the largest proposed in Licking County. Thus your ruling on this project has serious implications for the quality of life for people and properties that will be surrounded by, immediately adjacent to or even in the immediate vicinity. While I can appreciate the need for sustainable power sources, the approach taken by HS/ ORR will be a major disruption in an area primarily zoned as agricultural and residential, and has been zoned as such for many years. Please consider how a major change of this magnitude would impact your community in many ways. Also, please consider the frustration if you would learn that local zoning had absolutely no control, and your Township Trustees were of no use whatsoever, could not protect the value of your home or your quality of life, and in some cases were involved with the project, or could economically receive substantial positive economic benefit from it.

First, please allow me to establish credibility for the information regarding wildlife in the project area.

As a graduate from Ohio State University with a Bachelors of Science degree in Wildlife Management, it has been privilege and honor to work for multiple agencies including municipal, state and NGO entities for over 56 years. I have also served as a professional consultant for both Federal agencies including National Park Service and the state of Ohio. In my professional it has been a requirement to not only identify but to

also know the natural history of a broad spectrum of wildlife species. Some of this experience has ranged over multiple countries in Europe, also Canada, the Caribbean and Costa Rica. Graduate work further broadened the spectrum of expertise in identification and interpretation of wildlife species and phenomenon which I have put to use in both paid and volunteer positions leading educational interpretive experiences for tens of thousands of people from preschool to senior ages, and all age classes.

This information is included not to boast of experience and knowledge in the field, but again to establish credentials for the information I am humbly submitting to OPSB.

The primary topic of opposition to this project is the potential impact on wildlife and biological diversity. This impact will be most severe in the thousands of acres converted from current agricultural use, and also the remaining natural areas of wildlife habitat remaining in the project area. However, the magnitude of conversion of agricultural and natural areas to high density, industrial scale usage will impact species far beyond the immediate project area.

Contrary to how HS/ORR portrays wildlife populations and wildlife diversity as insignificant in the project area as stated in their project application to OPSB, we have observed and documented both on our property and within and around the proposed project area a significant representation of both species and biodiversity.

Directly within the 6 acres of our property we have observed and documented significant wildlife and diversity over the 44 years of habitation. These records include 2 reptile species –Garter and Black Rat Snakes; 6 amphibians – Chorus Frogs, Tree Frogs, Spring peepers Leopard Frogs, Chorus Frogs, American Toads and Small-Mouthed Salamanders breed there. Additionally Fowlers, Toads were known to call during breeding season along sections of Otter Creek. the primary tributary stream that drains the entire watershed of the project area, and that will be in close proximity to many of the solar panel installations and their runoff and residue.

Several mammal species including one species of concern, The Meadow Jumping Mouse have been both observed and breed there. They include Chipmunks, Fox Squirrels, Marmota monax, 13 lined Spermophile, Deer Mice, White-Footed Mice, Least Weasel Also documented have been over 35 species of birds including bald eagle, osprey and several

species of warblers. Predatory bird species including screech owls and Great horned owls have been observed on territory. Bald eagles and ospreys have been there, and we have one record of red-tailed hawks nesting there.

Redheaded Woodpeckers, an Ohio Species Of Concern, have nested and raised a brood of young on this property.

Seasonal bird species have included snow buntings, Lapland Longspurs, Nighthawks, Kestrels, Marsh Hawk Harriers and Short-eared owls.

These are known as Grassland and open Land species. The group is also represented by two species of horned lark that nest along roadsides and in the very fields proposed for this project, as do killdeer and Eastern Meadowlark. It should be noted here that Open land and grassland species group of nesting birds in North such as these are listed as among the most impacted species of birds in North America primarily due to habitat loss. Will they be impacted, possibly eliminated from the lands of the project area.? It is most likely

The Columbus Dispatch documented and wrote an article about a rare Northern Shrike observed by hundreds of bird watchers along Clover Valley Road just south of School Lane during nesting season.

Gallinaceous birds known to the area include Ring-Necked pheasant and Bob White Quail (historically nesting). And wild turkey, the largest and most popular game bird in Ohio has nested and proliferated in many areas proposed for the project.

Monarch butterflies mate, lay eggs and have formed migrating resting clusters on the property, and Giant Swallowtail Butterflies propagate there. Fall migrations bring thousands of ??? Dragonflies

And all of these species listed above have been documented on just 6 acres within and near the project area.

Within a few miles of this property Mink, and New York weasel have been observed. Whitetail Deer are numerous, and muskrat are common in the entire watershed.

According to a HS/ORR spokesman, there are plans to remove fencerows, which represent some habitat islands for wildlife.

While the negative impact is most profound when in close proximity as proposed, the negative impact of replacing open space environment, as it now essentially exists, and replacing it with man made construction materials and industrial use can negatively impact Wildlife populations or biological diversity on adjacent properties. This is particularly pertinent for the landowners whose properties are slated to have massive and extensive solar panel installation within 100 feet of their property. That said, the impact of the proposed project would extend for multiple miles beyond the immediate site since many of

the discussed species are migratory, particularly most birds. In the case of Monarch butterflies, their breeding feeding and wintering ranges extend over three countries.

Thus I am requesting that the OPSB deny the application in this case as proposed for this community. A recent Columbus Dispatch news article referred to PUCO and OPSB as a “rubber stamp” agency and process. Please consider indicating to the people of Ohio that you do have their best interest in mind when reviewing projects of this magnitude and impact on local communities. Thank you for your consideration and listing of this opposition.

Gary R. Moore

Gary R. Moore

Licking County and Hartford Township Resident for 44 years

**This foregoing document was electronically filed with the Public Utilities
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Summary: Public Comment of Gary R. Moore, via website, electronically filed by
Docketing Staff on behalf of Docketing