

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Birch Solar)
1, LLC for a Certificate of Environmental)
Compatibility and Public Need to Construct a) Case No. 20-1605-EL-BGN
Solar-Powered Electric Generation Facility in)
Allen and Auglaize Counties, Ohio.)

DIRECT TESTIMONY OF

**Courtney Dohoney
Senior Associate, Project Manager
Stantec Consulting Services, Inc.**

**on behalf of
Birch Solar 1, LLC**

May 4, 2022

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

Matthew C. McDonnell (0090164)

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

2 My name is Courtney Dohoney. I am a Senior Associate and project manager for Stantec
3 Consulting Services, Inc. (“Stantec”). My business address is 3001 Washington
4 Boulevard, Suite 500, Arlington VA, 22201.

5
6 **2. Please summarize your educational background and professional experience.**

7 I obtained a Bachelor of Science in Environmental Studies from Bucknell University and
8 a Master of Environmental Management from Duke University. I have been an
9 environmental consultant in the renewable energy sector for 16 years. A copy of my resume
10 is attached to my testimony as Attachment CD-1.

11
12 **3. On whose behalf are you offering testimony?**

13 I am testifying on behalf of Birch Solar 1, LLC (“Applicant” or “Birch Solar”), which is
14 seeking to develop the proposed Birch Solar facility (“Project”) in Allen and Auglaize
15 Counties, Ohio.

16
17 **4. What is the purpose of your testimony?**

18 The purpose of my testimony is to provide additional context, support, and clarification
19 regarding the following exhibits that are part of the Application for a Certificate of
20 Environmental Compatibility and Public Need (“Certificate”), filed by Birch Solar in Case
21 No. 20-1605-EL-BGN on February 12 and 17, 2021, as supplemented,¹ and further
22 supplemented by responses to data requests that were received from the Staff of the Ohio
23 Power Siting Board (“Board”) and filed in the docket (“Application”):

- 24
25 • Exhibit B – Preliminary Decommissioning Plan
26 • Exhibit G – Economic Impact Report
27 • Exhibit J – Construction Route Study and Road Condition Report
28 • Exhibit N – Glare Hazard Assessment
29 • Exhibit P – Wetland and Waterbody Delineation Report

¹ The Application was initially filed on February 12 and 17, 2021, and subsequently supplemented on: March 25, 2021; March 31, 2021; April 5, 2021; October 5, 2021; February 9, 2022; February 17, 2022; and May 4, 2022.

- 1 • Exhibit U – Visual Resources Technical Report (aka visual impact analysis “VIA”)
2 • Exhibit W – Preliminary Drain Tile Assessment
3 • Exhibit X – Sound Report
4

5 In addition, I support the outreach with the State Historic Preservation Office (“SHPO”)
6 and the Memorandum of Understanding (“MOU”) regarding the history/architecture and
7 archaeology information submitted in this docket, as well as the landscape plan for the
8 history/architecture mitigation plan. My testimony, together with the other witnesses for
9 Birch Solar testifying in this case, supports approval by the Board of Birch Solar’s
10 application for a Certificate to construct the Project.
11

12 **5. Please describe the history of your involvement with the Birch Solar Project?**

13 My responsibilities for the Birch Solar Project included overseeing Stantec’s preparation
14 of the Application and managing the associated surveys and assessments that were
15 provided as exhibits within the Application. Further, I have supported the consultation
16 efforts with SHPO regarding cultural resources survey methods and mitigation plans.
17

18 **6. Have you reviewed the Certificate conditions recommended by the Board’s Staff on
19 pages 50 through 58 of their Report of Investigation issued on October 20, 2021
20 (“Staff Report”)?**

21 Yes I have.
22

23 **7. Are you aware that the Applicant has accepted the Certificate conditions
24 recommended by the Board’s Staff in the Staff Report and has committed to comply
25 with those conditions as part of its Certificate issued in this case?**

26 Yes. That is my understanding.
27

28 **8. Does the Application enable the Board to determine that the facility will comply with
29 the requirements established by the state of Ohio to prepare and provide a
30 decommissioning plan and cost estimate for the Project?**

31 Yes, I believe it does.

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9. Please summarize the Preliminary Decommissioning Plan Contained in Exhibit B of the Application.

A Preliminary Decommissioning Plan was provided as Exhibit B in the Application. This plan outlines the equipment and infrastructure required for construction and operation of the Project, the process, activities, and equipment needed to decommission the Project, the land restoration process, and finally an estimate of the costs to decommission the facility.

10. Will the Preliminary Decommissioning Plan be updated prior to construction?

Yes. Birch Solar commits to updating the plan and recalculating the decommissioning costs, without regard to salvage value. Further, the Applicant commits to comply with Condition 41 set forth in the Staff Report by filing the plan in the docket at least 30 days prior to the preconstruction conference and including in the plan all components specified in recommended Condition 41.

11. Please summarize the findings in the Economic Impact Report found in Exhibit G of the Application.

The Economic Impact Report provided as Exhibit G of the Application, which was updated and replaced by the Applicant's Response to the Third Data Request from Staff filed on April 9, 2021, uses an input-output model approach to quantify the indirect and induced job creation and economic benefits that could result from the onsite construction of the Project and the ongoing operations and maintenance throughout the life of the Project. Based on the Applicant's estimate that construction will create between 400 and 500 construction jobs, the Jobs and Economic Development Impact Model ("JEDI") photovoltaics ("PV") model and IMPLAN Ohio multiplier data indicate that between 375 and 453 additional indirect and induced jobs could be created during construction. Additionally, JEDI/IMPLAN results indicate that the economic output could total between \$60 and \$85 million, based on the estimate of construction costs totaling between \$316 and \$360 million.

During the operational phase of the Project, JEDI/IMPLAN estimates that the Applicant's

1 estimate of 5 to 10 full-time onsite jobs could result in an additional 19 to 33 indirect and
2 induced jobs annually. The Applicant's estimated annual operations and maintenance
3 ("O&M") budget of between \$348,000 and \$697,000 will result in an annual estimated
4 economic output of between \$1.1 and \$1.3 million.

5
6 In addition to job creation and economic output, the Project is proposing to enter into a
7 payment in lieu of taxes ("PILOT") agreement with Allen and Auglaize Counties that
8 would contribute between \$2.1 and \$2.7 million annually to the counties. Over the life of
9 the Project this would total between \$73.5 and \$94.5 million.

10
11 **12. Please summarize the findings in the Construction Route Study and Road Condition**
12 **Report found in Exhibit J of the Application.**

13 The Construction Route Study and Road Condition Report provides a summary of the
14 visual inspection of roadways and infrastructure within and surrounding the Project Area
15 and then provides an assessment of the suitability of the current infrastructure to support
16 the expected construction traffic, as well as the O&M traffic throughout the life of the
17 Project. The report also documents interviews with the state, county, and township agencies
18 responsible for the assessed roadways. Conclusions from the report state that permanent
19 access drives can be constructed on the nearest roadways without creating significant safety
20 hazards and that construction access drives should be placed on township and county roads
21 where feasible. Consideration should be given to the weight-limited bridge on S. Kemp
22 Road. Neither culvert damage or road pavement damage is expected to be significant based
23 on the documented conditions and anticipated vehicle/equipment usage during
24 construction. Road Use Agreements are anticipated to be signed with Allen and Auglaize
25 counties and affected townships in order to specify any updates, repairs and transportation
26 routes, and the standards for repair for any roadways damaged during construction of the
27 Project.

28
29 **13. Please describe the methodology that was used to conduct the Glare Hazard**
30 **Assessment found in Exhibit N of the Application.**

31 The Glare Hazard Assessment relies on the ForgeSolar glare hazard analysis program to

1 analyze the potential for glare from the Project to affect pilots, drivers, and/or residents
2 near the Project. ForgeSolar is able to account for many variables that result in glare,
3 including Project specific design information such as the orientation, tilt, height, and
4 reflectance of the PV modules, and resting and maximum tracking angle of the trackers.
5 The program calculates glare throughout the course of a day as the trackers follow the sun
6 across the sky and considers the changing angle of the sun throughout the year. The model
7 was run to evaluate the potential for glare impacts at airports and heliports within a 10-mile
8 radius of the Project, drivers driving through the Project Area, train engineers using the
9 railroad tracks that cross through the Project Area, and residents adjacent to the Project.
10 All routes and homes were analyzed using 5-foot, 10-foot and 15-foot panel heights to
11 document a full range of potential panel heights to ensure the worst-case scenario is
12 captured.

13
14 **14. Please summarize the results of the Glare Hazard Assessment.**

15 The Glare Hazard Assessment, as supplemented with the Applicant's Response to the
16 Eleventh Data Request from Staff filed on October 14, 2021, found that the Project is not
17 expected to result in glare for pilots landing at two airports within 10 miles of the Project
18 Area or for helicopter pilots hovering at 500 feet over three heliports that are located within
19 10 miles. Further, the ForgeSolar analysis determined that glare from the Project is not
20 predicted to occur for drivers of vehicles on 14 roadways adjacent to the Project or for train
21 engineers on the railroad tracks crossing through the Project Area. Glare is also not
22 predicted for the 100 residences that were analyzed within proximity to the Project Area.

23
24 **15. Please summarize the findings in the Wetland and Waterbody Delineation Report
25 found in Exhibit P of the Application.**

26 The Wetland and Waterbody Delineation Report summarizes the results of a field survey
27 effort completed across the entire Project Area to delineate streams and wetlands so that
28 the site layout could be designed such that impacts to these important features are avoided.
29 Wetland boundaries were assessed using the "Routine On-site Determination Method" as
30 described in the U.S. Army Corps of Engineers ("USACE") Wetland Delineation Manual
31 (USACE Environmental Laboratory 1987) and the Regional Supplement to the Corps of

1 Engineers Wetland Delineation Manual: Midwest Region (Version 2.0). Streams were
2 documented per the protocols outlined in the USACE's Guidance on Ordinary High Water
3 Mark Identification (Regulatory Guidance Letter, No. 05-05; USACE 2005). Functional
4 assessments for all identified streams and wetlands were completed using Ohio
5 Environmental Protection Agency's ("OEPA") Headwater Habitat Evaluation Index and/or
6 Qualitative Habitat Evaluation Index ("HHEI/QHEI") and the Ohio Rapid Assessment
7 Method version 5.0 ("ORAM"), respectively.

8
9 Three wetlands, totaling 0.50 acres were identified within the Project Area. ORAM scores
10 ranged between 16 (poor quality) and 41 (fair-moderate quality) for the wetlands. Fourteen
11 streams were identified within the Project Area, totaling 27,007 linear feet. HHEI/QHEI
12 scores for the streams ranged from 34.75 (poor quality) to 59 (good quality).

13
14 As stated in the Application, the site design has avoided impacts to all identified stream
15 and wetland features within the Project Area.

16
17 **16. What is the Visual Resources Technical Report contained in Application Exhibit U?**

18 The Visual Resources Technical Report or VIA is intended to support the Application in
19 addressing Ohio Administrative Code ("O.A.C.") Rule 4906-4-08(D)(4), which states that
20 project applicants shall evaluate the potential visual impacts of proposed facilities to
21 recreational, scenic, and historic resources within at least a 10-mile radius from the project
22 area. Specifically, the document describes the visibility of the Project based on a viewshed
23 analysis, the existing landscape and its scenic quality, the alterations to the landscape
24 caused by construction and operation of the Project, visual impacts to landmarks and
25 recreation and scenic areas within 10 miles of the Project, photosimulations of the proposed
26 Project, and measures taken to avoid or minimize adverse visual impacts resulting from the
27 Project.

28
29 **17. How was the existing character of the landscape evaluated in the VIA?**

30 The existing character of the landscape was evaluated using publicly available aerial
31 imagery, databases of public lands, churches, schools, National Register of Historic Places

1 (“NRHP”) locations, and recreation areas, and applicable comprehensive plans from the
2 counties and townships. Photographs taken for the photosimulation effort were also used
3 to support discussions of existing visual conditions surrounding the Project Area.
4

5 Agricultural activity was determined to be the dominant feature in the Project Area. The
6 Project Area’s visual character is defined by the contrast between the predominantly flat
7 farmlands and clusters of vegetation that abut suburban development.
8

9 **18. Please describe the VIA methodology contained in Exhibit U of the Application and**
10 **describe how the Project’s visual impact was assessed.**

11 The Project’s visual impact methodology was a three-step process: 1) preparation of a
12 viewshed analysis, which shows the areas of potential Project visibility within a 10-mile
13 radius based on topography and the height of Project infrastructure; 2) a visual resources
14 inventory, which identifies resources within 10 miles of the Project area that are valued
15 specifically for their scenic quality; and 3) production of visual simulations based on
16 selected photographs of the Project site and which, as a set, provide a basis by which
17 existing visual conditions can be compared to the conditions with the Project in place.
18 Specifically, we consider the location, scale, and visual appearance of the features affected
19 by and associated with the Project.
20

21 **19. Please describe the Photographic Simulation Analysis of Existing and Proposed Views**
22 **completed.**

23 A representative set of viewpoints were selected in and around the Project Area and
24 photographs were taken looking towards the proposed Project. A subset of the viewpoints
25 were selected for creation of photosimulations and identified as key observation points
26 (“KOPs”), which collectively served as the basis for this analysis. This selection reflected
27 results of the viewshed analysis and was done in coordination with the Applicant.
28 Assessments of existing visual conditions were made based on professional judgment that
29 took into consideration sensitive receptors and sensitive viewing areas in the vicinity of the
30 Project Area. The visual simulations of views illustrate the location, scale, and conceptual
31 appearance of the Project, as seen from each KOP; they allow for comparison of pre-Project

1 and post-Project conditions for each location reflected in the KOP.

2
3 **20. Please summarize the findings of the Visual Resources Technical Report contained in**
4 **Exhibit U of the Application.**

5 The Visual Resources Technical Report concluded that the Project would be visually
6 unique to the local landscape and would alter the existing visual character, which is defined
7 by the transition from flat agricultural lands to suburban development. The solar modules
8 would be highly visible and identifiable to viewers in the areas immediately adjacent to the
9 Project. However, views of mechanical structures, such as those associated with the Lima
10 Substation, are already prevalent throughout the Project Area, particularly in the eastern
11 portion of the Project Area near the residential subdivisions. Visibility of the Project would
12 decrease over relatively short distances as the photosimulations show that the Project
13 would be barely detectable from about 0.4 mile away. The Applicant's commitment to
14 plant vegetation along the main roadways in the Project Area to screen the Project from
15 nearby residences and drivers will also limit views of the Project.

16
17 **21. Please summarize the findings of the Drain Tile Assessment contained in Exhibit W**
18 **of the Application.**

19 The Drain Tile Assessment provides the results of an effort to document the approximate
20 location of agricultural drain tiles in the agricultural fields to be used for the Project. By
21 identifying the location of the drain tiles, the site layout can be developed to minimize the
22 potential for drain tiles to be broken during construction. Information about the location of
23 drain tiles within their fields was requested from Project landowners to support this
24 mapping effort. For fields where landowners did not have mapping, aerial imagery from
25 multiple years was reviewed and drain tile lines were manually digitized when drain tile
26 signatures were identified. The last method employed to identify main drain tile lines was
27 documentation of the outfall locations by survey crews. If during construction drain tiles
28 are damaged, the Applicant will have in place a procedure to document the location and
29 notification process to ensure that a contractor is engaged to repair the damaged drainage
30 tiles as part of construction and site restoration efforts consistent with Condition 30 in the
31 Staff Report. The stormwater and erosion controls in place for the Project during

1 construction will also serve to mitigate any offsite water flow that may result from broken
2 drain tiles.

3
4 **22. Please discuss the Board’s construction and operational sound requirements that**
5 **apply to the Project.**

6 Although there are no applicable noise limits, an appropriate benchmark that frequently
7 has been used to assess solar energy projects in Ohio is that the facility’s daytime noise
8 contribution during operation does not result in noise levels at any non-participating
9 sensitive receptor within one mile of the project boundary that exceeds the ambient daytime
10 Leq sound level by more than five A-weighted decibels (“dBA”).

11
12 The Board requires applicants to submit certain information regarding potential noise
13 impacts of proposed solar facilities. This information includes:

- 14 • O.A.C. Rule 4906-4-08(A)(3)(a) - An analysis of construction noise levels
15 expected at the nearest property boundary;
- 16 • O.A.C. Rule 4906-4-08(A)(3)(b) - An analysis of operational noise levels expected
17 at the nearest property boundary;
- 18 • O.A.C. Rule 4906-4-08(A)(3)(c) - The location of any noise-sensitive areas within
19 one mile of the facility;
- 20 • O.A.C. Rule 4906-4-08(A)(3)(d) - A description of the equipment and procedures
21 that will be used to mitigate the effects of noise emissions during construction and
22 operation; and
- 23 • O.A.C. Rule 4906-4-08(A)(3)(e) - Preparation of a preconstruction background
24 noise study of the project area that includes measurements taken under both day
25 and nighttime conditions.

26
27 **23. Please generally describe the work that was done to prepare the Sound Report found**
28 **in Exhibit X to the Application.**

29 The Sound Report provided in Exhibit X and the Third Supplement to the Application
30 provided on April 5, 2021, summarize the ambient sound monitoring that was conducted
31 at five locations across the Project Area to characterize existing sound levels in the Project

1 Area. Sound measurements were continuously recorded at each monitoring location for a
2 period of seven days. An onsite weather station was also deployed at one of the monitoring
3 locations to record wind speeds during the ambient survey period. The resulting sound level
4 and weather data was analyzed and sound measurements were filtered out if they were
5 found to be anomalous such as during periods of high wind or rain. After filtering, an
6 average ambient sound level for each monitoring location and a Project-wide average was
7 calculated, as well as average ambient sound levels for daytime and nighttime periods.

8
9 Operational sound was calculated using ISO 9613-2 algorithms to estimate sound
10 propagation and atmospheric absorption. The manufacturer's specifications for sound
11 pressure levels for the proposed inverter model were used to model operational sound
12 resulting from each of the 95 inverter locations. Additionally, the operational sound from
13 the transformer at the Project substation location was modeled using an industry standard
14 assumption for sound pressure levels.

15
16 The ambient data measured in the Project Area was utilized, along with the predicted
17 operational sound, to then determine the total sound expected at all sensitive receptors
18 within 1 mile of the Project.

19
20 **24. Please summarize the findings of the Sound Report with respect to construction of**
21 **the Project.**

22 Heavy construction equipment including, but not limited to, backhoes, bulldozers, and haul
23 trucks may be present and operational at different points during the first phase of the
24 construction period. The second phase of construction at each array site will include impact
25 drivers to set piles for the tracking system. Noise levels from equipment will vary by type,
26 age of equipment, and overall condition. Sound levels associated with the type of
27 equipment expected to be used will vary from approximately 79 to 90 dBA at 50 feet, but
28 at a distance of 300 feet will range from approximately 65 to 74 dBA and will be reduced
29 to between 54 and 64 dBA at a distance of 1,000 feet. At times, construction activities will
30 be audible to nearby sensitive receptors; however, not all equipment will be operating at
31 the same time, and activities will be spread throughout the Project Area and temporary in

1 duration. To limit construction impact sound, consistent with Condition 28 of the Staff
2 Report, construction activity will be limited to the hours of 7 a.m. to 7 p.m., or dusk if
3 sunset occurs after 7 p.m. While noise from construction activities may be heard at off-site
4 locations, the sound will vary over time and be temporary in nature. Construction will occur
5 mostly in the daytime hours and will generate sounds that are familiar to residents due to
6 other construction, industrial, and agricultural activities in the area. The overall noise
7 impact on nearby sensitive receptors during construction of the Project is not expected to
8 be significant.

9
10 **25. Please summarize the findings of the Sound Report with respect to operation of the**
11 **Project.**

12 The average ambient nighttime sound level recorded at the Project, after filtering out
13 anomalous data points, was 45.1 dBA. The operational sound level at the two residences
14 nearest to the Project was modeled to be 45.9 and 44.0 dBA, combined with the average
15 ambient nighttime sound level, resulted in a total expected sound of 48.5 and 47.6 dBA.
16 The total expected sound at the two nearest residences is less than the average ambient
17 nighttime sound level plus 5.0 dBA of 50.1 dBA. Nighttime noise from the Project will be
18 substantially less, as all equipment will be operating in stand-by mode, as the sun is not
19 shining and power is not being produced.

20
21 **26. Are you familiar with the requirements set forth in Condition 32 of the Staff Report**
22 **regarding execution of a Memorandum of Understanding?**

23 Yes.

24
25 **27. Please explain the purpose of a Memorandum of Understanding with SHPO and the**
26 **requirements therein.**

27 The MOU with SHPO is intended to memorialize the results of the History/Architecture
28 Reconnaissance Survey and Report that was completed for the Project, which was filed on
29 March 25, 2021, as a Supplement to the Application and is supported by the testimony of
30 Ryan Weller. This report concludes that three architectural resources and one potential
31 historic district that were recommended eligible for the NRHP have the potential for

1 indirect adverse effects due to visual impacts from the Project. Additionally, one historic
2 resource that could not be surveyed was recommended as having an adverse effect due to
3 visual impacts. Within the MOU, the Applicant will commit to implementing a Visual
4 Impact Mitigation Plan which consists of vegetative screening planted on Project land to
5 limit views of the Project from the five potentially impacted resources, thereby mitigating
6 the Project's impact. Also, consistent with Condition 15 of the Staff Report, the Applicant
7 will memorialize in the MOU that is will use wildlife friendly, agricultural fencing along
8 the perimeter rather than chain-link fencing to further limit the Project's visual impact.
9

10 **28. Based upon the commitments Birch Solar has made through the Preliminary**
11 **Decommissioning Plan, Economic Impact Report, Construction Route Study and**
12 **Road Condition Report, Glare Hazard Assessment, Wetland and Waterbody**
13 **Delineation Report, Visual Resources Technical Report, Preliminary Drain Tile**
14 **Assessment, and the Sound Report together with the conditions in the Staff Report,**
15 **is it possible to determine the nature of the probable environmental impact of the**
16 **facility?**

17 Yes.

18
19 **29. Based upon the commitments Birch Solar has made through the Preliminary**
20 **Decommissioning Plan, Economic Impact Report, Construction Route Study and**
21 **Road Condition Report, Glare Hazard Assessment, Wetland and Waterbody**
22 **Delineation Report, Visual Resources Technical Report, Preliminary Drain Tile**
23 **Assessment, and the Sound Report together with the conditions in the Staff Report,**
24 **does the facility represent the minimum adverse environmental impact on those**
25 **resources?**

26 Yes.

27
28 **30. Are your opinions and conclusions in your testimony made with a reasonable degree**
29 **of professional certainty?**

30 Yes.

31

1 **31. Does this conclude your testimony?**

2 Yes. However, I reserve the right to update my testimony to respond to any further
3 testimony, reports, and/or evidence submitted in this case.

CERTIFICATE OF SERVICE

The Ohio Power Siting Board'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 these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 4th day of May, 2022.

/s/ Christine M.T. Pirik _____

Christine M.T. Pirik (0029759)

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Birch Solar 1, LLC
Case No. 20-1605-EL-BGN

Attachment CD-1
Courtney Dohoney
Resume

Courtney Dohoney PMP

Senior Associate, Project Manager
16 years of experience · Arlington, Virginia

Ms. Dohoney specializes in agency consultation and permitting for large-scale renewable energy and electric transmission line projects across the Midwest and Mid-Atlantic. Regular project management activities include conducting and managing preparation of biological survey work plans and reports, Habitat Conservation Plans, Eagle Conservation Plans, EAs, EISs, state siting board applications, and county use permits for proposed transmission, solar, and wind energy facilities. She also provides expert testimony as part of state and local application hearings. Ms. Dohoney excels at working collaboratively with diverse groups of stakeholders to develop minimization and mitigation strategies for natural resource impacts, identifying critical issues and pathways to successful project development.

EDUCATION

Bachelor of Science, Environmental Studies, Bucknell University, Lewisburg, Pennsylvania, 2004

Masters of Environmental Management, Duke University, Nicholas School of the Environment, Durham, North Carolina, 2006

CERTIFICATIONS & TRAINING

PMP, Project Management Institute, Project Management Professional, Newtown Square, Pennsylvania, 2016

PROJECT EXPERIENCE

RENEWABLE ENERGY, SOLAR

Madison Fields Solar Project | Savion | Rosedale, Ohio | Project Manager

As project manager for the Madison County Solar Project, Ms. Dohoney was responsible for coordinating the preparation of the Certificate of Environmental Compatibility and Public Need (CECPN) that was submitted to the Ohio Power Siting Board (OPSB). She managed Stantec's preparation of supporting studies and plans such as the visual impact assessment, vegetation management plan, site plans, etc. She also oversaw the work completed by the cultural resources subconsultant and coordinated with other resource consultants to ensure a complete, comprehensive document was prepared. She also supported the project in public involvement meetings.

Marion Solar Project | Savion, LLC | Marion, Ohio | Project Manager

Ms. Dohoney managed the Stantec team and coordinated the development of an application to OPSB for a CECPN for a 100 MW solar project located in Marion County, Ohio. In addition to preparation of the application and supporting the public outreach effort, Ms. Dohoney managed the Stantec team completing Waters of the U.S. and habitat surveys of the project area, initiated

consultation with USFWS and ODNR, and provided comprehensive resource support for all other environmental aspects of the Project such as a visual impact assessment, glare hazard analysis, and a vegetation management plan.

Scioto Farms Solar Project | Candela Renewables | Circleville, Ohio | Project Manager

On behalf of Candela Renewables, Ms. Dohoney coordinated the development of an application to the OPSB for a CECPN for a 110 MW solar project located in Pickaway County, Ohio. In addition to preparation of the application and supporting the public outreach effort, she led the Stantec team completing WOTUS and habitat surveys of the project area, initiated consultation with USFWS and ODNR, and provided comprehensive resource support for all other environmental aspects of the Project such as a visual impact assessment, glare hazard analysis, sound modeling, construction route and roadway study, drainage tile assessment, vegetation management plan, economic benefits, and a decommissioning plan.

Mark Center Solar Project | Savion, LLC | Mark Center, Ohio | Project Manager

Ms. Dohoney managed the Stantec team and coordinated the development of an application to OPSB for a CECPN for a 110 MW solar project located in Defiance County, Ohio. In addition to preparation of the application and supporting the public outreach effort, Ms. Dohoney managed the Stantec team completing Waters of the U.S. (WOTUS) and habitat surveys of the project area, initiated consultation with USFWS and ODNR, and provided comprehensive resource support for all other environmental aspects of the Project such as a visual impact assessment, glare hazard analysis, and a vegetation management plan.

Border Basin Solar Project | Galehead Development | Findlay, Ohio | Project Manager

Ms. Dohoney led the Stantec team that was responsible for the preparation of the CECPN that

was submitted to the OPSB for the 120 MW solar project. Stantec prepared the CECPN application and supported the public information meeting efforts. She has also managed the team addressing historic oil and gas wells located within the Project area, working with the ODNR Orphan Well Program to develop a survey method and prepare an unanticipated discovery plan should additional wells be discovered.

Kensington Solar Project | Liberty Power | Summitville, Ohio | Project Manager

Ms. Dohoney led the Stantec team that was responsible for coordinating the preparation of the CECPN that was submitted to the OPSB for the up to 145 MW project. She led the Stantec teams preparing reports for supporting studies and plans such as the visual impact assessment, noise study, road condition report, vegetation management plan, site plans, etc. She is also overseeing the work to be completed by the cultural resources subconsultant and has led coordination with other resource consultants to ensure a complete, comprehensive application document.

Birch Solar Project | Lightsource bp | Lima, Ohio | Project Manager

On behalf of Lightsource bp, Ms. Dohoney coordinated the development of an application to the Ohio Power Siting Board for a CECPN for the Birch Solar Project located in Allen and Auglaize Counties, Ohio. In addition to preparation of the application and supporting the public outreach effort, Ms. Dohoney has led the Stantec team and other subcontractors in completing WOTUS and habitat surveys of the project area, consultation with USFWS and ODNR, archaeology and history/architecture surveys, and SHPO consultation. She has also managed Stantec's evaluation and assessments for all other environmental aspects of the Project, including a visual impact assessment, glare hazard analysis, sound modeling, construction route and roadway study, drainage tile assessment, vegetation management plan, economic benefits, and a decommissioning plan.

Rockfish Solar Project | juwi Americas | Waldorf, Maryland | Project Manager

Ms. Dohoney served as the project manager, providing all environmental support services for juwi Solar, Inc.'s Rockfish Solar project. She led the team in conducting an initial critical issues analysis (CIA) for the site that identified permitting requirements and significant environmental constraints. Using the information obtained in the CIA, She managed the preparation of the environmental review document (ERD) to support the Certificate of Public Convenience and necessity (CPCN) application. As part of the ERD and to support agency consultation, under her management, the project team also conducted a habitat assessment and detailed wetland delineation survey, supported the project during the Public Service Commission hearing, and led agency consultation with the Maryland Department of the Environment (MDE) and Maryland Department of Natural Resources (MDNR). Through this

coordination effort and collaborative revisions to the project layout, the client was able to avoid the need to obtain a non-tidal wetlands permit, which can take up to four months to obtain and requires wetland mitigation efforts (creation, restoration, or enhancement), keeping the project on schedule and saving additional permitting costs.

Confidential Solar Energy Developer | Iowa, Wisconsin, Minnesota, Michigan, Illinois, Indiana, Ohio, Kentucky | Project Director

For a confidential solar energy developer, Ms. Dohoney served as the program manager, overseeing the project teams supporting numerous solar energy facilities in several states across the Midwest and mid-Atlantic. The scopes of work for this client included preliminary studies of critical site issues and baseline environmental conditions, wetland delineations, habitat mapping and assessments, as well as permitting support and agency consultation.

Due Diligence Acquisition Support | Ohio, Maryland, Maine, New Hampshire, Vermont, Delaware, Connecticut | Project Manager

As project manager, Ms. Dohoney managed a team of environmental professionals completing a due diligence evaluation of a portfolio of 28 solar energy projects across seven states in the northeast and Midwest for environmental liabilities prior to the potential portfolio acquisition. The project team reviewed and assessed all environmental studies and assessments completed for each project to date, evaluated studies and permits that would likely be needed for successful development, and used a comprehensive matrix to compare and rank the projects in terms of ease and cost of development. In addition to the due diligence evaluation, she also oversaw and coordinated project teams who completed Phase I Environmental Site Assessments in compliance with the applicable ANSI standard for all 28 projects.

Bellflower Solar Project | Lightsource bp | Project Manager

Ms. Dohoney managed the Stantec team that supported Lightsource bp through the local permitting processes in Henry and Rush Counties, and prepared an economic impact report, photosimulations, a decommissioning plan, and a sound assessment for the proposed Project.

White Trillium Solar Project | Lightsource bp | Van Wert, Ohio | Project Manager

Ms. Dohoney led the Stantec team providing comprehensive support for the White Trillium Solar Project, located in Van Wert County, Ohio. She managed the preparation of a critical issues analysis, Phase I ESA, desktop cultural resources assessment, decommissioning plan, economic benefit report, and photosimulations. Stantec also completed wetland and stream delineations, habitat assessment, and led consultation with USFWS and ODNR.

RENEWABLE ENERGY WIND

Black Fork Wind Project | Capital Power | Ohio | Project Manager

For the proposed 200-MW facility, Ms. Dohoney managed the preparation of the successful application for a certificate of environmental compatibility from the Ohio Power Siting Board (OPSB), making it one of the first wind energy projects in the state to successfully navigate the stringent OPSB application process. The permitting process involved comprehensive assessment of the ecological, agricultural, land use, human health, visual, and historical impacts. Ms. Dohoney oversaw the completion of avian and bat surveys in accordance with Ohio Department of Natural Resources (ODNR) guidance. She also led meetings and follow-up consultation with representatives of the ODNR and USFWS. In support of the OPSB application and future wetland permitting requirements, she managed wetland and stream delineation surveys and a habitat assessment survey. In addition to the ODNR-required biological surveys, Ms. Dohoney led consultation with USFWS to develop a bald eagle survey methodology to comply with USFWS Eagle Conservation Plan Guidance. She also presented the project at public meetings and testified at the adjudicatory hearing. Ms. Dohoney continued to manage the project after issuance of the certificate to help the new project owner, Capital Power, satisfy the certificate conditions.

Radford's Run Wind Farm | E.ON Climate and Renewables | Maroa, Illinois | Project Manager

For E.ON's approximately 306 MW wind farm, Ms. Dohoney was the project manager, having supported the project from development through operation. She completed an initial desktop CIA to identify potential environmental constraints and permits necessary for project development. Following completion of the CIA and consultation with USFWS and Illinois Department of Natural Resources, she coordinated development and implementation of pre-construction avian and bat field surveys to determine the presence and distribution of avian and bat resources within the project area. In addition to conducting migratory bird and raptor surveys, bat acoustic monitoring, and bat mist-netting surveys, the team also completed habitat mapping of the project area in order to determine whether the site contains suitable habitat for federally or state-listed threatened and endangered species. Ms. Dohoney also led the team that helped the client prepare a county Special Use Permit, including providing support at the County hearing. She also prepared a bird and bat conservation strategy (BBCS) document that was developed in order to minimize impacts to bird and bat resources from the construction and operation of the project and support issuance of a Technical Assistance Letter from USFWS. Per the TAL requirements, she managed the completion of spring and fall bat post-construction mortality monitoring surveys for the project.

Confidential Wind Project | Indiana | Project Manager

For a major wind energy developer, Ms. Dohoney is

leading a project team that completed an initial CIA to identify any fatal flaws and subsequently is providing turn-key environmental support for a proposed wind project in Clinton County, Indiana. As project manager, she is leading the team completing comprehensive bird, bat, cultural resources, and wetland pre-construction surveys. Specifically, she managed the completion of migratory bird, eagle point-count, aerial raptor nest, bat mist-net, and acoustic monitoring surveys. She facilitated agency consultation with USFWS and Indiana Department of Natural Resources.

Confidential Wind Project, Iowa | Iowa | Project Manager

For a major wind energy developer, Ms. Dohoney is leading a project team that completed an initial CIA to identify any fatal flaws and subsequently is providing turn-key environmental support for a proposed wind project in Cerro Gordo County, Iowa. As project manager, she is leading the team completing comprehensive bird, bat, cultural resources, and wetland pre-construction surveys. Specifically, she managed the completion of migratory bird, eagle point-count, aerial raptor nest, bat mist-net, and acoustic monitoring surveys. She facilitated agency consultation with USFWS and Iowa Department of Natural Resources.

Goodwell Wind Farm | Confidential Client | Goodwell, Oklahoma | Project Manager

As project manager for the 200-MW wind project and associated transmission line located in Oklahoma and Texas, Ms. Dohoney managed pre-construction migratory bird and raptor surveys, bald eagle point count surveys, aerial raptor nest surveys, and habitat mapping. She also led agency consultation with USFWS, Oklahoma Department of Wildlife Conservation, and Texas Parks and Wildlife to identify agency concerns.

Alta Farms Wind Project | Tradewind Energy, Inc. | Clinton, Illinois | Project Manager

Ms. Dohoney has served as project manager for the Alta Farms project since 2009. During that time she has overseen and managed numerous pre-construction avian, eagle, and bat surveys, habitat mapping, and led agency consultation efforts with USFWS and IDNR. She has also supported the DeWitt County Special Use Permit application process, providing expert testimony at the County Hearing.

Confidential Wind Project | Missouri | Project Manager

For a 300-MW wind project in Missouri, she managed the preparation of a habitat conservation plan to support the acquisition of a Section 10 Incidental Take Permit (ITP) from USFWS for the federally endangered Indiana bat. As part of this effort, she led extensive consultation with USFWS regarding siting of the project away from areas with high bat activity, development of curtailment scenarios, post-construction monitoring, and additional mitigation efforts. She also participated in the greater prairie-chicken surveys, habitat mapping, and wetland

delineation. Because the greater prairie-chicken is a state-listed endangered species, Ms. Dohoney led consultation with the Missouri Department of Conservation regarding mitigation and minimization options.

Criterion Wind Project | USFWS | Maryland | Deputy Project Manager

For the USFWS Chesapeake Bay Field Office and Constellation Holdings (now Exelon Corporation), Ms. Dohoney was co-lead author of a third-party EA being prepared in accordance with NEPA for this wind energy site located on Backbone Mountain. The EA addressed the environmental effects of the proposed issuance of an ITP and approval of a habitat conservation plan for Indiana bat under Section 10(a)(1)(B) of the Endangered Species Act. Because this potentially would be the first ITP for the Indiana bat issued by USFWS for an operating wind energy facility, the lack of precedent required the project team and USFWS to work collaboratively to develop a method to assess resource impacts from four potential alternatives, including the operating project, over the 20-year operational life of the project. The draft EA was one of the first NEPA documents to evaluate cumulative impacts of the wind industry on birds and bats.

Confidential Wind Energy Developer | Illinois, Iowa, Indiana, Michigan, Missouri, Pennsylvania, Nebraska, Oklahoma, Colorado | Project Manager

For a major wind energy developer, Ms. Dohoney was the project manager for 20+ projects located in eight states throughout the Midwest. As many Midwestern states do not have defined pre-construction monitoring protocol, Ms. Dohoney worked closely with the federal and state resource agencies to identify site-specific concerns and subsequently develop field surveys to address them while satisfying the needs of both the agencies and the wind energy developer.

Greenwich Wind Project | Windlab Developments | Ohio | Project Manager

In 2013, for Windlab Developments, Ms. Dohoney managed the preparation of the wetland and waterbodies and ecological communities sections of the Ohio Power Siting Board certificate of environmental compatibility application for the 25-turbine wind park.

Nationwide Wind Energy Facility Environmental Compliance Audits | Washington, Oregon, Oklahoma, Kansas | Auditor

Ms. Dohoney was a member of the team that helped a confidential client with permit compliance for over 20 wind energy facilities in Washington, Oregon, Texas, Oklahoma, Kansas, Minnesota, Iowa, Illinois, Indiana, and New York. To support the client's environmental management system, she contributed to the development of an annual assessment and evaluation process that each facility could use to facilitate its day-to-day compliance. She also participated in the regulatory and management gap analysis and provided guidance regarding identified

corrective actions.

Confidential Wind Farm | Indiana | Project Manager

For a confidential wind energy developer, Ms. Dohoney was the PM for a team that conducted extensive biological surveys for a proposed 100-MW wind energy project in Delaware and Randolph counties, Indiana. Ms. Dohoney and team initiated agency consultation with USFWS and the IDNR to identify known T/E species occurrences within the project area and/or surrounding area. After identifying potential agency concerns, she worked with the project team and resource agencies to develop and implement pre-construction avian and bat field surveys, including four season bird and raptor surveys, a raptor stick-nest survey, bat acoustic monitoring, and bat mist-netting surveys. In order to address potential Indiana bat issues for the Project, the project team worked with USFWS to complete habitat mapping of the project area in order to determine the extent and quality of habitat for the federally listed endangered Indiana bat and prepared a BBCS to support a Technical Assistance Letter for the project.

Critical Issues Analyses | Indiana, Missouri, Iowa, Illinois, Wisconsin, Ohio | Project Director

For a confidential client, Ms. Dohoney has served as project director, overseeing the completion of numerous critical issues analyses (CIAs) for potential wind farms across the Midwest. Each CIA contains a desktop evaluation of the environmental and biological resources present in the project area and surrounding vicinity (environmental setting, birds, bats, T/E species, water resources, parks/natural areas), as well as an assessment of potentially applicable environmental permits. The objective of the CIA is to identify any fatal flaws that could prevent development of the project or cause significant time or monetary commitments if development and construction were to proceed.

Confidential Wind Project | Virginia | Project Manager

Ms. Dohoney led a team of biologists to complete bat acoustic monitoring surveys and consultation with the Virginia Department of Conservation and Recreation for a proposed wind energy project.

Confidential West Virginia Wind Project | Mount Storm, West Virginia | Project Manager

Ms. Dohoney led a team of resource experts to prepare an Environmental Assessment, compliant with the National Environmental Policy Act for a proposed wind energy project near Mt. Storm, West Virginia. In addition to evaluating proposed impacts from the construction and operation of the project, Ms. Dohoney's team led consultation on behalf of the lead federal agency with the U.S. Fish and Wildlife Service and the State Historic Preservation Office.

ENVIRONMENTAL ASSESSMENTS – ELECTRICAL TRANSMISSION

Great Northern Transmission Line EIS | U.S. Department of Energy | Minnesota | Project Manager

Ms. Dohoney was the project manager for the third-party EIS for the high-profile Minnesota Power project, delivering low carbon hydropower from Manitoba to the Iron range of Minnesota. This proposed 220-mile, 500 kV project had national importance because the U.S. Department of Energy (DOE) used it to demonstrate how a joint state/federal EIS can be completed in an expedited manner. As project manager for the effort to analyze resources related to cultural, visual, land use and recreation, air quality, transportation, socioeconomic, and human health and safety-related resources, Ms. Dohoney coordinated resource experts and reviewed all project materials. Despite the evaluation of more than 30 different route variations or alignment modifications, the project was still able to maintain an aggressive schedule, producing a Final EIS in 13 months from the Notice of Intent. She also managed E & E's support of DOE's Section 106 consultation and extensive government consultation with Native American tribes in the region.

Northern Pass Transmission Line EIS | U.S. Department of Energy | New Hampshire | Deputy Project Manager

Ms. Dohoney was the deputy project manager for a third-party EIS for the DOE for this proposed \$1.4 billion, 192-mile, 345-kV transmission line extending from Quebec, Canada into New Hampshire. She coordinated all biological field survey analyses including Canada lynx, dwarf wedgemussel, wetland delineations, habitat assessments, acoustic bat surveys, breeding bird surveys, and aerial raptor nest surveys. The work involved consultation with EPA Region 1, the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), the USDA Forest Service (White Mountain National Forest), and New Hampshire Fish and Game Department. As part of the field coordination effort Ms. Dohoney also oversaw all consultation with cooperating agencies and other resource agencies and is managing the production of all project documentation.

WETLAND AND NATURAL RESOURCE SERVICES

Sabine National Wildlife Refuge Hurricane Clean-up | USCG, USFWS, and USEPA | Hackberry, Louisiana | Field Monitor

Ms. Dohoney was a member of the a team that worked with representatives of the United States Coast Guard (USCG), USFWS, and EPA to help guide the cleanup and repair of Sabine National Wildlife Refuge, which had been extensively damaged by Hurricanes Katrina and Rita. She provided written and photodocumentation of impacts on the surrounding wetland as a result of clearing debris from the levee. She used a Trimble GPS handheld unit to document hazardous material-related items such as drums, cylinders, tanks, and totes; white goods such as refrigerators and ice machines; electronic goods such as televisions and microwaves; and munitions found during the clearing operations.

PRESENTATIONS

Applicability of Indiana Bat Habitat Conservation Plans to Protect the Northern Long-eared Bat . *AWEA WindPower*, 2015.

Comparison of Three Indiana Bat Habitat Conservation Plans: A Framework for Success . *AWEA WindPower*, 2013.

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5/4/2022 3:30:15 PM

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Case No(s). 20-1605-EL-BGN

Summary: Testimony - Direct Testimony of Courtney Dohoney electronically filed by
Christine M.T. Pirik on behalf of Birch Solar 1, LLC