

From: [Puco Docketing](#)
To: [Puco ContactOPSB](#); [Puco Docketing](#); asasson@aol.com
Subject: RE: public comment: Proposed OPSB rule changes OAC 4906, Case No.: 21-902-GE-BRO
Date: Friday, August 5, 2022 4:56:32 PM
Attachments: [image001.png](#)
[image002.png](#)

We have accepted and will process your filing as public comments.

If you would like to have your comments filed in the case documents, you will need to file them as "Comments" via e-file or fax.

Below is a link to instructions for setting up an account/profile in order to e-file if you do not already have an account. You will also need to submit a participation agreement before your account is activated. Please return the participation agreement (and have already set up your account and created your profile) to docketing@puco.ohio.gov and we will get your account activated. There is a link to the participation agreement also in the link below.

<https://puco.ohio.gov/documents-and-rules/resources/how-to-register-in-dis>

In the alternative, you may also file your comments via fax at 614-466-0313.

Thank you.

Debbie Ryan

Public Utilities Commission of Ohio
Business Resources - Administration Division
Administrative Officer 2
(614) 387-1011
PUCO.ohio.gov



This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

From: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Sent: Friday, August 5, 2022 4:52 PM
To: Puco Docketing <docketing@puco.ohio.gov>
Subject: public comment: Proposed OPSB rule changes OAC 4906, Case No.: 21-902-GE-BRO

From: asasson@aol.com <asasson@aol.com>
Sent: Friday, August 5, 2022 4:30 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Cc: jftetzloff@aol.com; darterland@yahoo.com; asasson@aol.com

Subject: Proposed OPSB rule changes OAC 4906, Case No.: 21-902-GE-BRO

Re: Case No. 21-902-GE-BRO. Ohio Power siting Board Review of Ohio Administrative Code Chapters 4906-1, 4906-2, 4906-3, 4906-4, 4906-5, 4906-6, AND 4906-7

Ohio Adm. Code 4906-1

Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

Via email to:

contactOPSB@puco.ohio.gov

August 5, 2022

Dear Ohio Power Siting Board:

The DCA is a volunteer organization that has existed since 1972 with the purpose of protecting the National Scenic River Big Darby Creek and the outstanding natural environment in the watershed. Multiple solar energy facilities and transmission lines are proposed in the Big Darby Creek watershed, a National Scenic River due to its outstanding biological diversity. Such siting affects the ecological integrity of the Big Darby Creek and tributaries, and many other Ohio streams, among other natural features.

On October 1, 2021, the Darby Creek Association (DCA) submitted comments on Case No. 21-902-GE-BRO, Ohio Power siting Board Review of Ohio Administrative Code Chapters 4906-1, 4906-2, 4906-3, 4906-4, 4906-5, 4906-6, AND 4906-7, in response to the OPSB's announcement at <https://opsb.ohio.gov/wps/portal/gov/opsb/events/case-no-21-902-ge-bro-wksp2>. The present set of comments is in response to the OPSB's "proposed changes to Ohio Adm. Code Chapters 4906-01 through 4906-7 (Attachment A) and the BIAs (Attachment B), which are also posted on the Public Utilities Commission of Ohio's Docketing Information System website at <http://dis.puc.state.oh.us/>" and specifically at <https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A22F16B40150J01285>.

The comments below apply to the draft June 16, 2022, OAC 4906 rules for utility scale solar facilities and associated transmission lines. Because Ohio's natural features, such as vegetation communities, wetlands and stream are stressed and often degraded and/or sensitive to perturbation, siting, design and operation of solar facilities and transmission lines must do a better job of protecting Ohio's biological integrity. Multiple utility scale solar facilities are either certified or proposed within or adjacent to the Big Darby Creek watershed, potentially affecting around 10,000 acres in this National and State Scenic River watershed known for its outstanding biological diversity, including rare aquatic species and a unique prairie vegetation genotype. For comparison, this solar facility land area is close to the total amount of conservation land set aside for parks and natural areas in the Big Darby Creek watershed in the past 60 or so years.

We also provide our comments in the interest of preserving and improving other Scenic Rivers in Ohio and their outstanding biological features, as well as other areas proposed for the siting of solar facilities where the natural environment can be protected, including beyond compliance with present OPSB rules, and rules and recommendations of other state agencies. Other streams and associated natural features in those watersheds that are not Scenic Rivers also need improvement and deserve protection. Many streams in Ohio are not attaining even basic compliance with the Clean Water Act (See Ohio EPA's 2022 Integrated Report), and even in Ohio's outstanding streams, like the Little Miami River, mussel species are declining rapidly (Hoggarth 2020).

The following comments related to these draft rules that DCA feels need improvement to protect the

natural features of Ohio's outstanding rivers and their watersheds. This is followed by our resubmittal of comments resubmit our October 1, 2021, comments as an attachment for your consideration and convenience. We believe these deserve additional consideration.

Thank you for the opportunity to comment.

Sincerely,

/Signed/

John Tetzloff, President
Anthony Sasson
Charlie Staudt

Darby Creek Association
2726 Camden Road
Upper Arlington, Ohio 43221
darbycreeks@aol.com
614 288-0313

Attachments

CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

8/5/2022 5:03:21 PM

in

Case No(s). 21-0902-GE-BRO

Summary: Public Comment of John Tetzloff, President, Anthony Sasson, Charlie Staudt, via website, electronically filed by Docketing Staff on behalf of Docketing