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September 29, 2022

Ohio Power Siting Board
Chair Jenifer French
180 E. Broad Street
Columbus OH 43215

Re: OPSB Case Number 21-902-GE-BRO
IN THE MATTER OF THE OHIO POWER SITING BOARD'S REVIEW OF OHIO ADM.CODE CHAPTERS 4906-1, 4906-2, 4906-3, 4906-4, 4906-5, 4906-6, AND 4906-7

Dear Chair French,

I am a Cedarville Township resident, in Greene County, OH, who lives on a farm. I have spent the last 3 years asking questions, participating in, researching and trying to understand the Ohio Power Siting Board's siting process.

I am reaching out to you after reading through the comments posted to the OPSB rule review docket, case no. 21-902-GE-BRO. Many of the public comments are canned responses from Ohioans who live in cities. As I read through the docket, I wondered about which industries would profit from said comments. I also wondered if the commenters ever participated in the OPSB siting process. Have they spent tens of thousands of dollars, along with their townships and county, just to have their voice heard in a governmental process? Have they been subject to depositions, discovery and evidentiary hearings? Have they paid the price to participate in this process? It is a costly one.

Now that Senate Bill 52 has raised the voices of local citizens and officials, developers and organizations are demanding evidence and facts based arguments from citizens who oppose these projects. Our personal experience with agrarian culture, our land, our people, our water and past history with our communities doesn't seem to count as facts or evidence. What a shame. We live, work and worship in our communities. What does it take to be an expert?

It appears to take 7-10 acres to produce 1 MW of electricity. Being that the OPSB oversees solar projects that are 50 MW or greater. The question then becomes, does a township have 350 or more acres of contaminated land available for a solar or wind project? The only responsible sites for solar energy are rooftops, contaminated land, brownfields or the like. If a township does not have that amount of contaminated land available, then the township should be excluded and protected from such projects.

Agriculture is Ohio's #1 industry. We have some of the best farmland in the country and the world. American Farmland Trust's 2020 Farms Under Threat: The State of States Executive Summary report (AFT, 2020) stated, "The United States is home to 10 percent of the planet's arable soils—the most of any country on Earth. Yet even here, in what appears to be a vast agricultural landscape, only 18 percent of the continental U.S. is Nationally Significant land. As

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we face growing demand for high-quality food and environmental protection along with increasingly complex challenges from epidemics, extreme weather, and market disruptions, it is especially important to protect the land best suited to intensive food and crop production, including fruits, nuts, vegetables, and staple grains." (AFT, 2020, Pg.2)

Ohio is covered in Nationally Significant land, the 18% treasure noted above. We have been granted an irreplaceable gift. To do anything other than protect that gift would be absurd. It would not be in Ohio's best interest, putting our safety and health at risk.

The simple truth is that steel and glass are not crops and they do not belong on arable land. Unfortunately, in the midst of wanting to save the planet, create clean energy options and be green, people have been convinced that solar panels and wind turbines belong on agricultural land. They do not. I won't take the space to add the ORC's definition of agriculture here, but as you surely are aware, solar panels and wind turbines are not included in it.

American Farmland Trust recently released their Farms Under Threat 2040: Choosing An Abundant Future report (AFT, 2022). In it they state, "Without further policy intervention, 2.9 million acres of utility scale solar are expected to be built between 2022 and 2040. However, the Biden administration has called for eliminating all fossil fuels from the electricity sector. Estimates of the amount of utility scale solar needed to achieve this goal by 2040 range from 5.3 to 7.4 million acres." The report also states, "AFT projected that more than 80% of new solar built by 2040 will be sited on agricultural lands." "AFT modeling found that if standard modeling practices mirror historical patterns, 49% of new solar installations on agricultural land could go on Nationally Significant land, the nation's best land for long term production." (AFT, 2022, pg. 38).

No farmland is needed to meet the Biden Administration's goals. The EPA's Re-Powering America's Land Initiative offers responsible options for siting solar and wind. They have already screened five times the amount of acreage that would be needed to meet said goals. The EPA has screened 39,600,000 acres (enough to produce 581,000MW) of brownfields, contaminated lands, landfills, old mine sites and Superfund sites for solar and 32,600,000 acres (enough to produce 173,000MW) for wind power (EPA, 2022, Pg. 3). Their Re-Powering America's Land Initiative: Re-Powering Mapper Fact Sheet shows that the United States has 18,298 landfills screened positively for solar potential (EPA, 2022, Pg.4). There is no shortage of responsible siting options.

Why isn't the OPSB requiring all of those screened acres to be used up for solar and wind siting before they allow the conversion of Ohio's productive farmland to do so? Is the Department of Agriculture partnering with the Environmental Protection Agency to make this a priority? If they want to protect our farmland and are concerned with citizen's health & safety, climate change, food security, etc. then the collaboration of these two agencies on this matter should be natural.

The OPSB has already granted certificates for solar panels to be sited on 55,000 acres in Ohio (OPSB, 2022, Sept.). Not one additional acre of Ohio farmland needs to be granted for solar or

wind. It is not environmentally friendly, good stewardship, green or responsible to take farmland and put glass & steel or turbines on it. Especially when there are millions of acres of contaminated land that have already been screened for such sites.

Hardin I was the first utility scale solar project in Ohio to go operational in February 2021 (OPSB, 2022, Sept.). It has been operational for 17 months. Why is the OPSB placing their faith in immature and unproven projects instead of what has stood the test of time for 200+ years? Agriculture is a proven industry.

There seems to be some panic about economic development in Ohio by organizations demanding that the OPSB shoulder the burden of climate change. The most responsible answer the OPSB and Ohio can give to these demands is to refer solar and wind developers to the EPA.

The OPSB's mission is "...to support sound energy policies that provide for the installation of energy capacity and transmission infrastructure for the benefit of the Ohio citizens, promoting the state's economic interests, and protecting the environment and land use." Using contaminated lands for the siting of solar and wind energy is the most responsible way to protect the environment and land use. It may not be the cheapest or easiest option for developers, but it is the most responsible.

Thank you for all that you are doing. Keep up this good work. Rural Ohioans are counting on you to protect our communities and look out for our best interest.

With gratitude and respect,

Nicole Marvin

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References

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