

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
Blossom Solar, LLC for a Certificate of)	Case No. 22-151-EL-BGN
Environmental Compatibility and Public)	
Need)	

DIRECT TESTIMONY OF BROOKE HARRISON

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

A.1. My name is Brooke Harrison. I am a Project Manager for Burns & McDonnell.
My business address is 530 West Spring Street, Suite 200, Columbus, OH 43215.

Q.2. What are your duties as a Project Manager?

A.2. I am responsible for overseeing completion of environmental tasks including environmental field surveys, reporting and permitting to support a variety of different types of projects. I also delegate and oversee completion of environmental work out to other environmental staff located in the Columbus, Ohio office. For the Blossom Solar Project, I assisted with the completion of a wetland delineation report (Exhibit O to the Application) and wildlife report (Exhibit P to the Application) to support documentation of findings from the ecological field survey. I also assisted with completion of the ecology impact assessment report (Exhibit Q to the Application) and the vegetation management plan (Exhibit C to the Application).

Q.3. What is your education and professional background?

A.3. I graduated from The Ohio State University in 2002 with a Bachelor of Science. I hold a Wetland Delineation Certification from The Ohio State University and an Occupational Safety and Health Administration 40-hour Hazardous Waste Operation certification. I have over 21 years of experience performing field surveys and managing a

1 variety of natural resource projects including stream and wetland identification and
2 delineation, terrestrial habitat surveys, threatened and endangered species habitat surveys,
3 avian surveys, mitigation planning and monitoring, and project permitting. I also have
4 extensive experience with developing natural resource approaches to meet client and
5 project needs as well as assisting with navigating the regulatory landscape. I have
6 conducted ecological-related work throughout Ohio as well as in Kentucky, Michigan,
7 Pennsylvania, Illinois, Indiana, New York, Massachusetts, Minnesota, Washington,
8 Nebraska, Alabama, and Texas. Aside from my Blossom Solar Project work experience, I
9 am also working with another renewables client on two solar projects and one wind project
10 in Ohio to provide environmental construction compliance monitoring.

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

12 **A.4.** I am testifying on behalf of the Applicant, Blossom Solar, LLC (“Blossom Solar”
13 or “Applicant”) in support of its application filed in Case No. 22-151-EL-BGN.

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

15 **A.5.** The purpose of my testimony is to describe the various studies I was involved in
16 preparing for the Project. I will also provide my overall assessment of the potential
17 environmental and ecological impacts of the Project.

18 **Q.6. Please describe and summarize the study of wetland, streams, and other waters within**
19 **the Project Area as presented in the Application.**

20 **A.6.** Burns & McDonnell conducted a detailed study, including a field delineation, to
21 determine the boundaries of wetlands and other aquatic resources for the Project Area. The
22 Project is bounded to the south by State Route 309 (SR-309) and SR-288, extending west
23 to Iberia Bucyrus Road/SR-100 and north to Crawford-Morrow Line Road/CR-8 just south

1 of Galion, Ohio (“Survey Area”). The Survey Area is approximately 1,653 acres in size.
2 The completed wetland study was attached as Exhibit O to the Application filed on May
3 27, 2022.

4 Prior to the field investigations, Burns & McDonnell reviewed available background
5 information for the Survey Area. These included secondary literature sources (such as
6 topographic and aerial maps as well as National Wetland Inventory (“NWI”) wetland and
7 stream mapping) to evaluate the presence of mapped wetlands and streams within the
8 Project area.

9 The field work for this study was performed on April 26-30, 2021. Wetland areas and
10 other waters, including streams and agricultural ditches, were delineated on site using the
11 methodology enumerated in the 1987 United States Army Corps of Engineers (“USACE”)
12 Wetland Delineation Manual; the 2010 Regional Supplement to the Corps of Engineers
13 Wetland Delineation Manual: Midwest Region (Version 2.0); and relevant vegetation and
14 hydric soil sources. Wetlands and other waters were surveyed using a global positioning
15 system (“GPS”) unit. Wetland classification was completed in accordance with the
16 commonly-used Cowardin classification system as well as the Ohio Rapid Assessment
17 Method for Wetlands (Version 5.0). Streams were characterized using the Ohio EPA’s
18 Headwater Habitat Evaluation Index or the Ohio EPA’s Qualitative Habitat Evaluation
19 Index, as appropriate to the particular stream. These completed forms are included in
20 Appendix E to Exhibit O. Note that delineated wetlands and streams were generally in
21 agreement with what is shown on NWI mapping, topographic mapping, and aerial imagery.
22 Within the Project Area, we identified 26 wetlands, 19 surface waters, and five constructed
23 ponds. Category 1 wetlands accounted for 35.85 acres of wetland and Category 2 wetlands

1 accounted for 15.89 acres of wetland. Relatively few wetlands were identified given the
2 size of the Survey Area, and no high-quality Category 3 wetlands (the highest quality
3 classification for wetlands) were documented within the Survey Area. A large portion of
4 the wetlands identified are either located within forest habitat or along field edges.

5 A total of 17 ephemeral streams, totaling approximately 16,619 feet in length, were
6 delineated within the Survey Area. Ephemeral streams typically have a defined bed and
7 bank and surface water flowing or pooling only in direct response to precipitation, such as
8 rain or snow fall. Ephemeral streams are not identified on USGS topographic maps.

9 One intermittent stream, totaling approximately 2,744 feet in length, was delineated within
10 the Survey Area. An intermittent stream has flowing water during certain times of the year
11 when groundwater provides water for stream flow; during dry periods, intermittent streams
12 may not have flowing water. Intermittent streams are generally identified as dashed blue
13 lines on the USGS topographic maps.

14 Finally, one perennial stream, totaling approximately 1,862 feet in length, was delineated
15 within the Survey Area. Perennial streams are generally identified as solid blue lines on
16 the U.S. Geological Survey (USGS) topographic maps and typically have water flowing
17 year round. As noted in the Ecological Impact Assessment (Exhibit Q to the Application),
18 while some temporary impacts are expected with regard to four streams during
19 construction, the remaining fifteen streams identified within the Survey Area should
20 remain unimpacted. These temporary impacts will occur to ephemeral streams, which are
21 typically dry outside times of precipitation.

22 As noted in the Ecological Impact Assessment (Exhibit Q to the Application), no
23 permanent impacts to streams or wetlands are expected from the installation of collection

1 lines. The preliminary design anticipates there will be four crossings of delineated streams
2 and/or wetlands (approximately 0.14 acres of impacts to wetlands and 0.06 acres of impacts
3 to streams) during construction. It is anticipated that there will be zero permanent impacts
4 associated from the installation of collection lines to streams or wetlands within the project
5 area due to the utilization of Horizontal Directional Drilling (“HDD”). It is anticipated
6 that 2,550 square feet of delineated streams would be permanently impacted due to
7 installation of access roads. Such permanent impacts from the installation of access roads
8 would be a result of installing permanent crossings for each access road, which are
9 constructed with a culvert or low water crossing to allow for equipment to safely cross over
10 and minimize impacts to the streams.

11 A total of five constructed ponds were identified within the Survey Area during the site
12 investigation for a total of 1.51 acres. These ponds are used as either a water source for
13 agricultural crops or livestock and have a defined bed and bank and surface water. These
14 ponds appear to be manmade and constructed in upland soils, and therefore, are not
15 considered wetlands. An USACE preliminary jurisdictional determination was received
16 on January 14, 2022, indicating that the five ponds are not considered waters of the U.S.
17 and not regulated by the USACE (Appendix D). The Ohio EPA may regulate these
18 features; however, the current Project layout causes no impacts to construction ponds.

19 **Q.7. Please describe and summarize the study of wildlife in the Project Area.**

20 **A.7.** Burns & McDonnell also assessed the site for the presence of potential habitat that
21 could support listed mussels, birds, fish, and plants. No evidence of bat activity was
22 observed during the site investigation; however, field observations were completed during
23 daylight hours when bats are generally not active. Although suitable bat habitat was

1 observed within the Survey Area at the time of the site visit, no publicly available records
2 of known bat habitat are within the Survey Area or its 0.25-mile buffer.

3 One perennial stream (S-18, Mud Run) was identified within the Survey Area that exhibits
4 free-flowing water with stable banks and could serve as potential fish and mussel habitat.
5 No mussel or fish populations were observed in this stream at the time of the site visit.
6 Further, no impacts or no in-water work from project construction or construction impacts
7 will occur within this perennial stream (S-18 Mud Run).

8 Multiple wetlands (W-1, W-12, W-13, W-14, W-16, W-17, W-18, and W-22) identified
9 within the Survey Area consisted of larger portions of emergent wetland area that could
10 provide habitat for listed bird species. However, these wetlands are designated as Category
11 1 lower quality wetlands and are surrounded by active agriculture and minimal buffers to
12 protect from disturbance. As such, it is very unlikely these wetlands would provide
13 potential habitat for state-listed bird species.

14 State-listed plant species for the Project Area would be expected to occur within wetlands,
15 streams, and woodlands. Given the constant disturbance of active agriculture, surrounding
16 grasslands and existing habitat fragmentation, it is unlikely such plant species would
17 inhabit areas within the Project. Furthermore, if listed plant species are present within
18 wetland and forest habitats, it is unlikely any impacts would occur as the Project proposes
19 to minimize impacts to wetlands and forest habitat. Impacts to wetlands and streams will
20 be minimized to the maximum extent practicable.

21 **Q.8. What is your overall opinion regarding the environmental and ecological impact of**
22 **the Project?**

23 **A.8.** In my opinion, based on my experience and involvement with this Project (which

1 has involved scoping and overseeing the natural resource review activities, as well as
2 reviewing resulting reports relative to Project details), the environmental and ecological
3 impact of the Project will be minimal. The Project has been intentionally sited to avoid
4 and/or minimize impacts to wildlife by locating the majority of infrastructure within active
5 agricultural land, which is lower quality habitat that does not support a diversity of species.
6 The Applicant has also designed the Project to avoid and minimize impacts to wetlands,
7 waterbodies, woodlots, and aquatic and terrestrial wildlife species. On a landscape scale,
8 there is abundant availability of similar agricultural fields within the surrounding area that
9 can be used as similar habitat. After construction, the Project Area will be stabilized with
10 permanent vegetation, an improvement from row crops that will provide potential foraging
11 habitat for area birds and wildlife.

12 Additionally, Blossom Solar has entered into a Joint Stipulation with Board Staff and other
13 parties on February 3, 2023. Conditions 26, 27, 29, and 30 in the Joint Stipulation will
14 further minimize the environmental and ecological impact of the Project as they direct
15 Blossom Solar to coordinate with Board Staff, ODNR, and/or USFWS with regard to any
16 encounter with state or federally-listed threatened or endangered species.

17 **Q.9. Does this conclude your direct testimony?**

18 **A.9.** Yes, it does.

CERTIFICATE OF SERVICE

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Summary: Testimony Direct Testimony of Brooke Harrison electronically filed by
Ms. Anna Sanyal on behalf of Blossom Solar, LLC