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February 1, 2023

Kentucky Electricity Generation and Transmission Siting Board

P.O. Box 615, 211 Sower Blvd

Frankfort, KY 40602-0615

RE CASE# 2022-00115

Please include the documents included with this mailing in the public comments for this case.

Greetings,

The USDA and State of Kentucky agreed to a Conservation Reserve Enhancement Program to restore thousands of acres in South Central Kentucky's Green River Watershed. The revitalization of this area was done to help protect Mammoth Cave National Park and the ecologically rich Green River.

Local land owners and farm producers enrolled in the CREP program and agreed to plant native grasses, trees and other vegetation to improve water quality and wildlife habitat. There were paid considerable lease payments per acre per year to participate in the program.

Over a 15 year period the federal government originally offered to spend \$88 million dollars and the state was to spend \$17 million dollars to implement this program. This does not include the costs borne by the producers. According to an Annual Program Accomplishment Report for fiscal year 2012 the federal government has spent well over \$260 million dollars for this program.

One of the three landowners leasing land to Thoroughbred Solar on this project received thousands of dollars from the USDA and Kentucky over the past 15 years to protect the Green River Watershed. If this project gains approval the

investment made by USDA and Kentucky will be forever wasted. Not to mention the damage to Green River and its ecology.

Please consider the damage that will be done by locating this project in this karst area so close to Green River and Mammoth Cave National Park. Why would our federal and state governments spend millions of dollars to protect this area for you to come behind them and destroy it.

Sincerely,

A handwritten signature in black ink that reads "Paul C. Hawkins". The signature is written in a cursive style with a large, prominent initial "P".

Paul C. Hawkins

7925 Cub Run Highway

Munfordville, KY 42765



Farm Service Agency

Fact Sheet

January 2007

Conservation Reserve Program – Kentucky Green River Conservation Reserve Enhancement Program

Overview

USDA and the state of Kentucky have agreed to implement a Conservation Reserve Enhancement Program (CREP) to restore up to 99,500 acres in south central Kentucky's Green River Watershed. Revitalizing this area will help protect Mammoth Cave National Park and the ecologically rich Green River.

CREP uses federal and state resources to safeguard environmentally sensitive land through the Conservation Reserve Program (CRP). CREP provides financial incentives to encourage producers to voluntarily enroll in 10 to 15-year CRP contracts. Producers enrolled in CRP remove lands from agricultural production and plant grasses, trees, and other vegetation to improve water quality, soil, and wildlife habitat. CRP is authorized by the Food Security Act of 1985, as amended.

Benefits

The Green River is one of North America's most diverse ecosystems and the most biologically abundant branch of the Ohio River System. The river flows unhindered for more than 100 miles through 8 counties and through Mammoth Cave National Park, the world's largest and most diverse cave system. The Kentucky CREP will ensure the long-term protection of water quality and habitat for a wide array of wildlife, including threatened and endangered species.

Goals

The goals of the Kentucky CREP are to:

Reduce by 10 percent the amount of sediment, pesticides, and nutrients entering the Green River and Mammoth Cave system by growing strips of grass and trees around streams and sinkholes;

- Protect wildlife habitat and populations, including threatened and endangered species;
- Restore riparian habitat along the Green River;
- Restore the subterranean ecosystem by targeting 1,000 high priority sinkholes.

Program Cost

The expected federal, state, and private cost over 15 years is more than \$105 million. Of that amount, \$88 million will come from the federal government and \$17 million from Kentucky. This does not include costs that may be borne by producers. Kentucky will also provide financial incentives and will seek to buy permanent conservation easements.

Eligible Areas

Producers can offer land in the watershed below the Green River Lake Dam. This includes areas adjacent to streams, rivers, and sinkholes and other land that meet CREP eligibility requirements. All or portions of the following Kentucky counties are included:

Adair
Green
Taylor

Allen
Hart
Warren

Barren
Logan

Butler
Metcalfe

Edmonson
Russell

Grayson
Simpson

Approved Conservation Practices

The CRP conservation practices approved for this program are:

- CP1 Introduced Grasses
- CP2 Native Grasses
- CP3 Tree Planting
- CP3A Hardwood Tree Planting

- CP4B Permanent Wildlife Habitat (corridors)
- CP4D Permanent Wildlife Habitat
- CP8A Grassed Waterways
- CP9 Shallow Water Areas for Wildlife
- CP10 Grass Cover - Already Established
- CP11 Tree Cover - Already Established
- CP21 Filter Strips
- CP22 Riparian Buffer
- CP23 Wetland Restoration
- CP23A Wetland Restoration, Non-Floodplain
- CP29 Marginal Pastureland Wildlife Habitat Buffer

Signup and Eligibility Requirements

Eligible producers can enroll in CREP through 10 to 15-year CRP contracts. Producers may extend the benefits of CREP through separate contracts with the state. Applicants must be able to offer eligible acreage and must satisfy the basic eligibility criteria for CRP. Eligible cropland is land that has been cropped 4 out of 6 years (1996-2001) and is currently physically and legally capable of being cropped. Marginal pastureland is also eligible when specific eligibility criteria is met for riparian buffers or wildlife habitat buffers. Applicants must generally have owned or operated the land for at least one year prior to enrollment. Persons with an existing CRP contract or an approved offer with a contract pending are not eligible for CREP until that contract expires.

CREP Payments

Kentucky CREP participants are eligible for four types of USDA payments:

- Signing Incentive Payment - a one-time payment of \$100 per acre for land enrolled in a riparian buffer practice, filter strip, grassed waterway, or wildlife habitat buffer. USDA makes this payment soon after the contract has been signed.
- Practice Incentive Payment - payment equal to about 40 percent of the total eligible cost for establishing the riparian buffer practice, filterstrip, grassed waterway practice, shallow water areas for wildlife, or wildlife habitat buffers. This payment is in addition to the 50 percent cost share assistance that USDA provides.
- Annual rental payment of 150 percent to 200 percent of the dryland cash rental rate, depending on the practice that is selected.
- Cost share assistance for installing the conservation practices on land that is retired.

In addition, Kentucky will offer one time lump sum incentive payments for permanent easements and will provide additional cost-share assistance on eligible practices.

Enrollment in Other Programs

Applicants may still enroll in general or continuous signup CRP. However, CREP provides additional benefits not available through the general and/or continuous signup. For instance, the CREP enrollment process is on a continuous basis and payments are at a higher effective rate.

Haying and Grazing

Haying and grazing is not allowed during the CRP contract period unless USDA permits it for emergency purposes under normal CRP rules.

For More Information

For more information on the Kentucky CREP, contact your local USDA Service Center, Farm Service Agency (FSA) office, or Soil and Water Conservation District office.

Additional information is also available on FSA's web site at : www.fsa.usda.gov

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To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C., 20250-9410, or call (202) 720-5964 (voice or TDD).

USDA is an equal opportunity provider and employer.

III. Monitoring and Evaluation



Western Kentucky University is responsible for the organization and implementation of a comprehensive monitoring and evaluation plan to determine the success of program goals. This effort is funded through various grant sources and is being implemented within the watershed.

A monitoring report was submitted by Dr. Ouida Meier, WKU Biology Department. It is available online by clicking the following link

http://bioweb.wku.edu/faculty/omeier/crep/NRCS_CREP_Nov12_report-summaryfinal.doc

IV. Conclusion

General Financial Overview: The Green River CREP was approved as a 100,000 acre and \$110,000,000 program which was divided among USDA (\$88,000,000 commitment), the Commonwealth of Kentucky state government (\$17,000,000 commitment), and The Nature Conservancy (\$5,000,000 commitment). These funds were those that were to be paid to landowners for conservation practices. Any expenses involved in the working and management of the program were not included in this total.

State Partners: The Commonwealth of Kentucky's state government agencies have paid just under \$11,000,000 to landowners in the forms of cost share assistance, practice incentives, and practice maintenance assistance. Some limited state cost share and incentive payments will continue be made in the coming year due to regulatory annual limitations and assistance to KDFWR on mid contract management assistance, but these payments will not have a significant impact on the overall total. After review of previous TNC monies paid to landowners and knowledge that some limited activity on easements has occurred, an estimate would be that their contribution should approach \$1,000,000.

Federal Partners: Federal expenditures have far exceeded the originally pledged \$88,000,000. Federal payouts will easily exceed \$260,000,000 over the lifetime of these contracts. There are a few obvious reasons for these numbers to be larger than originally thought. The Farm Safety Administration (FSA) office reviewed soil rental rates across the Commonwealth. Many rental rates were increased in the CREP counties. At nearly the same time, the expansion amendment, which added counties to the southwest was approved. The expansion encroached into a more "high-end" agricultural area, encompassing some of the more productive agricultural counties in the Commonwealth. Soil rental rates are much higher in these counties, thus increasing cost on payments. A detailed statistical analysis would be needed to fully identify the scope of the economics

of this program. This is also a primary reason that the state contributions have not been as high as the federal. State contributions are based on cost share amounts only and are unrelated to soil rental rate incentives.

The following charts represent a simple comparison of acreage enrolled into the program. It is related to the above conversation, as it shows how much of the enrolled land is in the expanded program area. Also, note the one added practice from the addendum (CP29), and how much of the acreage was enrolled after this addendum took effect. This information is a very important component of this program's success.

