

**CASE No. 2020-00190**  
**HORSESHOE BEND SOLAR, LLC**  
**SUPPLEMENTAL RESPONSE TO SITING BOARD'S POST-HEARING REQUEST FOR INFORMATION**

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4. Identify any product(s) or means of construction that would be able to reduce or limit noise during the construction process, particularly during the pile driving portion of the construction process, and provide the approximate cost of each such product or means of construction.

ORIGINAL RESPONSE: We reviewed this question with construction companies that work on solar projects, and the companies we talked with have not had this specific requirement for projects to date. Typically, if there has been a noise restriction, it has been to limit pile driving to specific hours during the day (for example, pile driving only between 7AM – 7PM).

Horseshoe Bend is aware of testimony in a recent hearing in Case No. 2020-00280 involving Ashwood Solar I, indicating that at least one contractor has used either a semi-tractor-trailer truck with canvas over the trailer, or sound blankets draped over the perimeter fencing of the site. The witness in that case indicated that these methods were used when the project was at a much closer distance than what was proposed in that case.

Our initial assessment of the first of these two potential technical solutions is that parking trucks at the perimeter of the site does not seem feasible at Horseshoe Bend because there are no roads that could carry a large truck located in the right places around the perimeter of the site. As described in the Application, there are two homes as close as 150 feet to Horseshoe Bend, and our assessment is that neither home has a road located between the home and the Project where a large truck could park.

We are investigating the possibility of using sound blankets draped over the perimeter fence during pile driving, to buffer noise from the two homes that are closest to

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the site. We will file a supplemental response regarding that potential solution by May 21, 2021.

**SUPPLEMENTAL RESPONSE:** After discussing the proposed technical solution of sound blankets draped over the perimeter fence with additional construction companies that work extensively in the solar industry, Horseshoe Bend did not encounter companies with experience using this technology. Therefore, Horseshoe Bend respectfully submits that the use of sound blankets is not a standard practice in the utility scale solar industry in the United States.

In lieu of a recommendation on a sound mitigation technology, Horseshoe Bend proposes the following revised mitigation measure for working hours, as described in Section 4 of the Site Assessment Report, and referenced in Section 6 of the Site Assessment Report:

*Horseshoe Bend's construction activity, process, and deliveries shall be limited to the hours of 7 a.m. and 9 p.m. daily.*

*Within 500 feet of a neighboring non-participating residential home, construction hours for the pile driver shall be limited to the hours of 8 a.m. and 6 p.m. daily.*

*Within 500 feet of a neighboring place of worship, construction hours for the pile driver shall be limited to the hours of 8 a.m. and 6 p.m. Monday through Saturday, and 1pm and 6pm on Sunday.*

Horseshoe Bend's other mitigation measures proposed in Section 4 and Section 6 remain unchanged by this modification, including advance notification of neighbors of the construction and operation periods.

Because construction noise is temporary and because the pile drivers move around the site and do not stay in one area or close to individual neighboring homes for

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significant periods of time, Horseshoe Bend respectfully suggests that limiting the working hours for the pile driver to hours when most neighbors will be at work will effectively provide the neighbors of the Project with reduced noise impacts during the short period of time that the pile driver will be nearest their home.

Horseshoe Bend also notes that there are only two non-participating landowners that live within 300 feet of the Horseshoe Bend Project and therefore, the number of days that pile driving will be close to neighboring residential homes is very limited.

Horseshoe Bend has also recently received communications regarding construction noise from an adjacent neighbor of a 50MWac solar project called "Bluestone" that was originally developed by Horseshoe Bend's parent company, Carolina Solar Energy, in Virginia. Bluestone has recently been built by ENGIE North America, the company that will build and operate Horseshoe Bend. The communication is from a neighbor who lives adjacent to the site and who experienced the construction noise first-hand. The individual is not a Bluestone project landowner, but experienced some benefit from the Bluestone project because she received access to fiber optic cable for broadband internet when Bluestone installed a new communications line in the area.

The note is filed confidentially to protect personal information, and reads:

Note: My husband and I live very close to the recently constructed solar farm known as the Bluestone Project in Chase city VA. You might say it sits in our back yard. When we were in the house we couldn't hear any noise and when we went outside it was no more than any other construction.

One inference from this note is that the Project's proposed mitigation measure related to noise is measured outside the home, whereas the Project's neighbors will

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generally be inside their homes. Depending on the amount of insulation and building materials used in the homes, construction sound levels may be buffered substantially by the homes themselves.

Exhibit A attached hereto includes a map of the Bluestone project area, as well as maps showing the location of the neighboring property owner who wrote the note regarding construction noise. The map shows that the neighbor's home is approximately 250 feet away from the Bluestone parcel boundary.

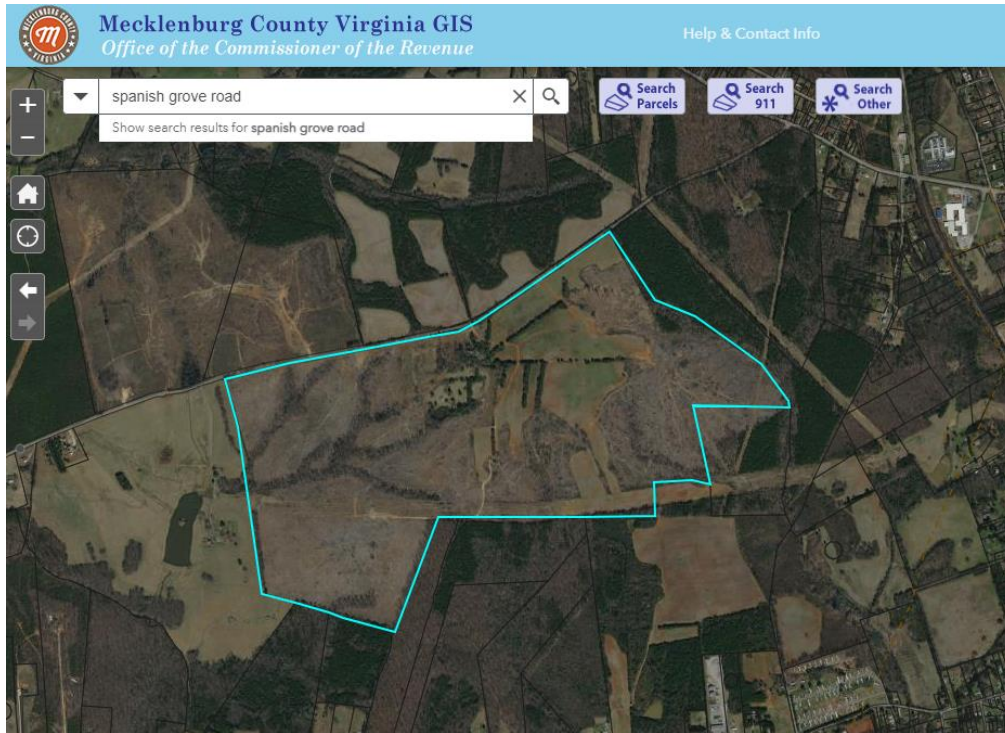
WITNESS:            Carson Harkrader

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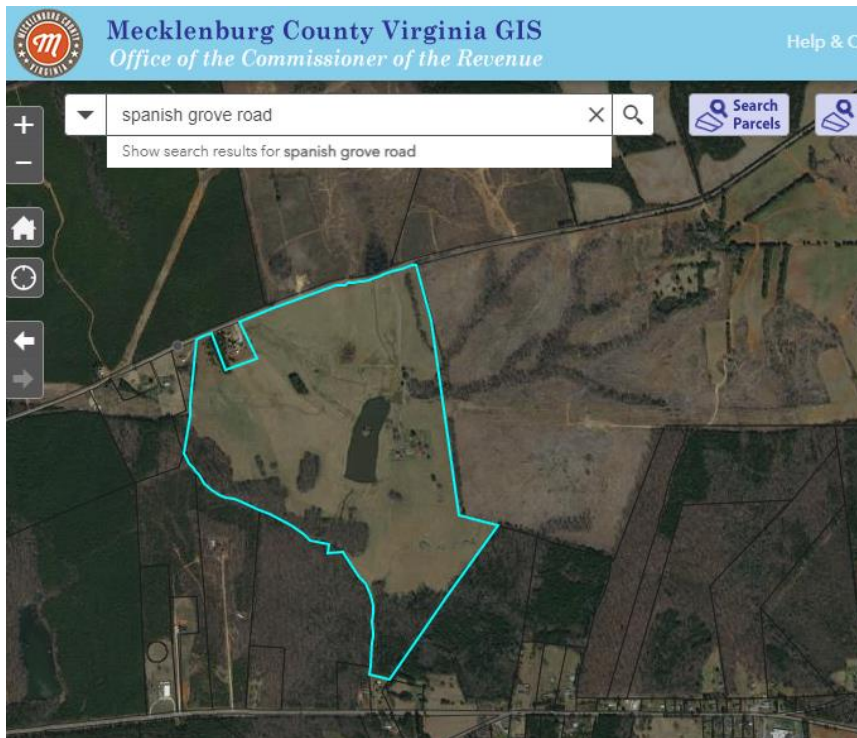
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Exhibit A

Map of the Bluestone project area (blue outline shows the solar project area.)



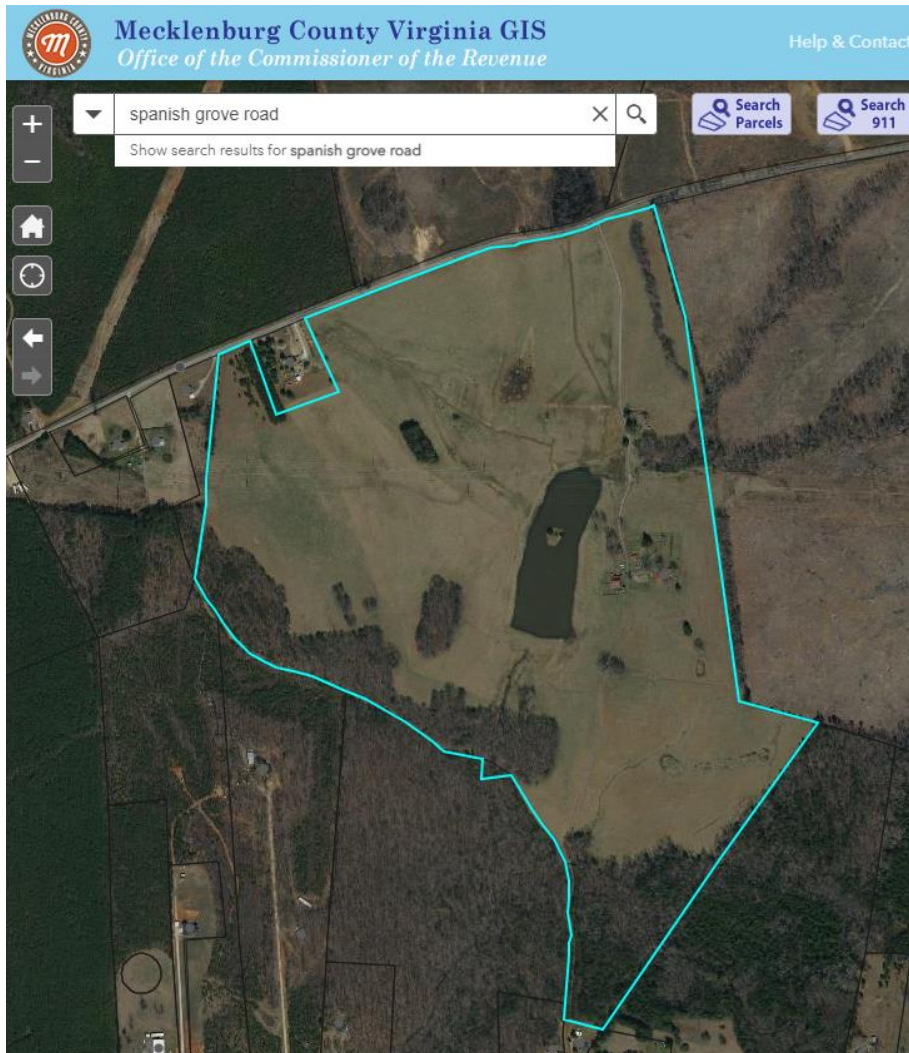
Map showing the location of the adjacent neighboring parcel owned by the author of the note.



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Mid-close up map showing the location of the home of the author of the note.



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Close up map showing the location of the home of the author of the note, approximately 250 feet away from the property line of the Bluestone solar project.

