

COMMONWEALTH OF KENTUCKY

BEFORE THE ELECTRIC GENERATION AND SITING BOARD

In the Matter of:

ELECTRONIC APPLICATION OF FLAT)
RUN SOLAR, LLC FOR A CERTIFICATE OF)
CONSTRUCTION FOR AN APPROXIMATELY)
55 MEGAWATT MERCHANT ELECTRIC) Case No. 2020-00272
SOLAR GENERATING FACILITY IN TAYLOR)
COUNTY, KENTUCKY PURSUANT TO KRS)
278.700 AND 807 KAR 5:110.)

FLAT RUN SOLAR LLC RESPONSE TO CONSULTANT’S REPORT

Flat Run Solar, LLC (“Flat Run Solar”) provides the following response to the BBC Research and Consulting’s Review and Evaluation of Flat Run Solar, LLC Siting Assessment Report (“Report”). Flat Run Solar appreciates the thorough review and analysis of the proposed Flat Run Project and proposed location. The Report’s recommendations are generally agreed to with minor recommended clarifications as are described below.

Description of Proposed Facility/ Site Development Plan

Recommended Mitigation:

Flat Run Solar should provide a final site layout plan to the Siting Board upon completion of the final site design. Any change in project boundaries from the information reviewed during this evaluation should be submitted to the Siting Board for review.

Response:

Because site layout has not been finalized and contractors have not been selected, the possibility exists that minor changes to project boundaries can occur. Flat Run recommends that minor alterations of site boundary, i.e., no additional properties added to the project and compliance with

setbacks are maintained, be considered immaterial changes that will not require Siting Board review.

Compatibility with Scenic Surroundings

Recommended Mitigation:

If requested by any of the five non-participating residences within 350 feet of the proposed project along segments of the project boundary not currently proposed to have vegetative buffers, Flat Run Solar should provide additional vegetative screening in these areas.

Response:

Flat Run is happy to discuss concerns and potential mitigation measures with any project neighbors harboring concerns. Flat Run will offer additional vegetative screening where logistically feasible and not in conflict with construction and operational requirements. Vegetative screening can not necessarily be added in all project locations.

Expected Noise from Construction and Operation

Recommended Mitigation:

Similar to other recent solar facility applications reviewed by the Siting Board, construction activity at the Flat Run Solar site should be limited to the hours of 8 AM to 6 PM, Monday through Saturday, to reduce impacts from construction noise on nearby residents.

Response:

Flat Run believes it has proposed reasonable construction hours with sufficient accommodations and mitigating efforts to ensure minimal disruptions to the surrounding community. Flat Run respects that the Siting Board has recently established precedent requiring construction only

between the hours of 8 AM to 6 PM, Monday through Saturday. Flat Run can accept this restriction on construction hours, but the viability of the project would be jeopardized by further restrictions on construction hours.

Recommended Mitigation:

While pile driving will occur within 1,500 feet of any nearby home or business, Flat Run Solar should implement a construction method to suppress the noise from the pile driving process – i.e., semi-tractor and canvass method, sound blankets on the permanent fencing surrounding the site or temporary fencing surrounding the immediate pile driving area, or other comparable methods.

Response:

Flat Run’s assessment is that parking trucks at the perimeter of the site does not seem feasible because there are no roads that could carry a large truck located in the right places around the perimeter of the site. Additionally, the well-established installation companies we contacted had no experience using sound blankets and generally believed it to be an impractical approach to mitigating sound. Flat Run believes the proposed setback requirements and restriction on construction hours provides sufficient mitigation to pile driving noise.

Impacts on Transportation

Recommended Mitigation:

Flat Run Solar should develop and implement a traffic management plan for the construction phase of the project to minimize impacts on traffic flow and keep traffic safe. As part of this plan, Flat Run Solar should implement ridesharing between construction workers, use appropriate

traffic controls or allow flexible working hours outside of peak hours to minimize any potential delays during AM and PM peak hours.

Response:

Flat Run can encourage ridesharing but will be unable to require ridesharing measures for construction workers coming from different locations. Construction will need to be carefully scheduled and coordinated, so flexible work hours will be infeasible.

Recommended Mitigation:

Flat Run Solar should commit to rectify any damage to public roads by fixing or fully compensating the appropriate transportation authorities for any damage or degradation to the existing road network that it causes or to which it materially contributes to.

Response:

Flat Run Solar commits to working with local officials to address any concerns regarding damage to existing road networks and to repairing damage substantially caused by traffic related to Flat Run Solar.

Respectfully submitted,



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