

**COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD
ON ELECTRIC GENERATION AND TRANSMISSION SITING**

In the Matter of:

ELECTRONIC APPLICATION OF MARTIN)	
COUNTY SOLAR PROJECT, LLC, FOR A)	
CONSTRUCTION CERTIFICATE TO)	
CONSTRUCT A MERCHANT ELECTRIC)	Case No. 2021-00029
GENERATING FACILITY IN MARTIN)	
COUNTY, KENTUCKY PURSUANT TO KRS)	
278.700 AND 807 KAR 5:110)	

**MARTIN COUNTY SOLAR LLC
RESPONSE TO CONSULTANT’S REPORT**

Martin County Solar Project, LLC (“Martin County Solar”) provides the following response to the Harvey Economics’ Review and Evaluation of the Martin County Solar Site Assessment Report (“Report”). Martin County Solar appreciates the thorough review and analysis of the proposed project and proposed location. The Report’s recommendations are generally agreed to with minor recommended clarifications as described below.

Compatibility with scenic surroundings:

Recommendation:

Martin County Solar should retain existing vegetation around the site’s perimeter to the extent possible and ensure the long-term health of the existing vegetation for the operation life of the project.

Response:

Martin County Solar will retain vegetation to the extent feasible and without conflicting with construction and operational requirements. Martin County Solar cannot control the long-term

health of existing vegetation due to the many variables impacting the existing vegetation, but Martin County Solar will endeavor to protect existing vegetation where feasible.

Recommendation:

While it is not expected, if any components of the facility are visible to neighboring homes after construction, Martin County Solar should assess whether a screening plan is appropriate by consulting with neighbors to determine if there are adverse impacts to their viewshed.

Response:

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

Potential Change in Property Values:

Recommendation:

BBC also recommends that the Property Value Impact Study by Kirkland Appraisals be updated to correct several inaccuracies. In lieu of an updated report, Martin County Solar should, at a minimum, supply a written statement from Kirkland Appraisals summarizing the conclusions of the original report and their continued applicability to the proposed project in spite of the substantial expansion of the project footprint.

Response:

An updated study is being prepared and will be provided once complete.

Expected Noise from Construction:

Recommendation:

Similar to other recent solar facility applications reviewed by the Siting Board, construction activity at the Martin County 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:

Martin County Solar believes it has proposed reasonable construction hours with sufficient accommodations and mitigating efforts to ensure minimal disruptions to the surrounding community. Martin County Solar respects that the Siting Board has recently established precedent requiring construction only between the hours of 8 AM to 6 PM, Monday through Saturday. Martin County Solar is proposed for a location that presents considerable natural visual and sound barriers. As such, Martin County Solar respectfully requests permission to construct the project between the hours of 8 AM to 8 PM, Monday through Saturday.

Recommendation:

Martin County Solar should implement a Customer Resolution Program to address any complaints from surrounding landowners. Martin County Solar should submit an annual status report on the Customer Resolution Program to the Siting Board, identifying any complaints, the steps taken to resolve those complaints, and whether the complaint was resolved to the satisfaction of the affected landowner.

Response:

Martin County Solar will strive to address any concerns raised by surrounding landowners. However, if an annual status report is required, Martin County Solar should only need to file such a report in years where complaints were received.

Impacts on Transportation:

Recommendation:

Martin County 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, Martin County Solar should implement ridesharing between construction workers as appropriate and feasible due to the COVID-19 pandemic, 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:

Martin County 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.

Respectfully submitted,



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