

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

In the Matter of:)
) **Case No. 2021-00235**
APPLICATION OF RUSSELLVILLE SOLAR LLC)
FOR CERTIFICATE OF CONSTRUCTION FOR: AN)
APPROXIMATELY 173-MEGAWATT MERCHANT)
ELECTRIC SOLAR GENERATING FACILITY IN)
LOGAN COUNTY, KENTUCKY PURSUANT TO)
KRS 278.700, ET SEQ., AND 807 KAR 5:110)

RESPONSE TO THE CONSULTANT’S REPORT

Russellville Solar LLC (“Russellville Solar”), by counsel, provides the following response to BBC Research and Consulting’s (“BBC”) report filed with the Siting Board on June 9, 2022.

Russellville Solar appreciates the time and effort BBC has spent on reviewing information related to this project, as well as its recommendation that the Siting Board approve a construction certificate for the generating facility and transmission line subject to complying with certain mitigation measures. Although Russellville Solar may disagree with some of the statements contained in the report, it has focused on the proposed mitigation measures identified on pages B-8 to B-12 of the BBC report because BBC indicated the mitigation measures would appropriately address any concerns BBC raised elsewhere in its report.

Generally, Russellville Solar finds the mitigation measures proposed by BBC to be reasonable, but clarification on at least one measure is necessary. BBC proposed its fourteenth measure to be as follows:

Russellville Solar should prioritize vegetative screen planting before commencing construction activity. This will not only mitigate noise but also allow for the growth of the tree screens during the construction phase, providing an established visual screen to protect

the viewshed before the facility begins operation. It may also help mitigate against impacts to the property values of the smaller residential properties adjacent to the proposed facility.

Russellville Solar agrees that it is reasonable and logical to plant vegetation buffers at the early stages of construction, with timing priority given to those areas that are most visible along public right of way but there are two reasons why there should not be a rigid and absolute requirement that all vegetation buffers be installed prior to any construction activity. First, planting of vegetation buffers is reliant on seasonal weather, and vegetation must be planted at the appropriate time in order to promote viability of the plants. Accordingly, there must be some flexibility as to when the vegetation buffers are planted. Second, BBC made the same suggestion in its Report in Rhudes Creek Solar LLC (2021-00127) and the Siting Board did not include the requirement of planting vegetation buffers prior to construction activity as part of its Mitigation Measures.

For these reasons, Russellville Solar would request any mitigation measure flexibly consider the timing of planting of vegetation buffers to provide enhanced viability of the vegetation.

Respectfully submitted,



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