

**LOST CITY RENEWABLES LLC
APPLICATION**

LOST CITY RENEWABLES LLC
CIP Projects
412 W 15th Street, 15th Floor
New York, NY 10011

January 2025

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1. Applicant Information

REQUIREMENT: per KRS 278.706(2)(a); *The name, address, and telephone number of the person proposing to construct and own the merchant electric generating facility*

COMPLIANCE: Lost City Renewables LLC (Lost City) is a Delaware limited liability company formed on June 21, 2022. Lost City is authorized to do business in Kentucky as of December 5, 2024. Further information about Lost City and its corporate ownership are included in Attachment A. The principal contact person, name, address, and telephone number for this application are provided below.

- Name: Lost City Renewables LLC
 Attn: Sean Joshi, Developer
 CI V Sunrise Renewables LLC
- Address: 412 W 15th Street, 15th Floor
 New York, NY 10011
- Phone: (843) 510-5254

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

2. Description of Proposed Site

REQUIREMENT: per KRS 278.706(2)(b); *A full description of the proposed site, including a map showing the distance of the proposed site from residential neighborhoods, the nearest residential structures, schools, and public and private parks that are located within a two (2) mile radius of the proposed facility*

COMPLIANCE:

Lost City is a proposed approximately 250-megawatt (MW) alternating current (AC) solar facility (“Project”) that would be located in southeastern Muhlenberg County approximately 0.4 miles east of Penrod and 1.25 miles northeast of Dunmor. The Project Area is bordered by US 431, KY 949, Free Lane (CR 1603), Mason-Poyner Road (CR 1162), and Forgy Mill Road (CR 1149). The Project would be constructed on a portion of a 1,413-acre area. The proposed project site is currently a mix of agricultural fields, grassed fields, and forest/wooded areas. The proposed Project Site is currently used as agricultural land, including for corn, soybeans, hay, poultry, cattle, sheep, and goats as well as forested areas.

Lost City plans to develop, construct, and operate the Project over its entire operating life. The Project would generate electricity through the use of photovoltaic solar panels. The Project includes approximately 400,000 photovoltaic solar panels, associated racking, inverters, overhead and underground electrical conveyance lines, and a utility substation transformer that will interconnect via an overhead gen tie line, approximately 10.8 miles to a Tennessee Valley Authority (TVA) substation.

Perimeter fencing will enclose the modules and associated infrastructure and a separate fence will enclose the substation. The Project will comply with the National Electric Safety Code (“NESC”) and American National Standards Institute (“ANSI”) Z535 Safety Sign Standards for Electric Utility Power Plants and Substations to guide the placement of safety signage around the facility. In addition, Lost City, or its contractor, will control access to the site during construction and operation. All construction entrances will be gated and locked when not in use.

A map showing the location of residential structures, schools, and public and private parks in relation to the Project is submitted as Attachment B. There are no schools or healthcare facilities within two miles of the Project’s radius. Lost City identified land adjacent to the Project site as a former park owned by Muhlenberg County Parks and Recreation but the area is not listed as a park on their website. There are no residential neighborhoods, per KRS 278.700(6), within 2,000 feet of the Project’s radius.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

3. Public Notice Evidence

REQUIREMENT: per KRS 278.706(2)(c); *Evidence of public notice that shall include the location of the proposed site and a general description of the project, state that the proposed construction is subject to approval by the board, and provide the telephone number and address of the Public Service Commission. Public notice shall be given within thirty (30) days immediately preceding the application filing to:*

- 1. Landowners whose property borders the proposed site; and*
- 2. The general public in a newspaper of general circulation in the county or municipality in which the facility is proposed to be located*

COMPLIANCE: A sample letter that was sent to landowners whose property borders the proposed site, followed by the list of addresses and names of those landowners who were sent notices on January 28, 2025, is contained in Attachment C. A copy of this notice were mailed to each landowner via USPS Certified Mail. Please see Attachment C for certified mail receipts.

Also contained in Attachment C is the affidavit of the notice published in the *Leader-News* on January 8, 2025, which is the newspaper of general circulation in Muhlenberg County.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

4. Compliance with Local Ordinances and Regulations

REQUIREMENT: per KRS 278.706(2)(d); *A statement certifying that the proposed plant will be in compliance with all local ordinances and regulations concerning noise control and with any local planning and zoning ordinances. The statement shall also disclose setback requirements established by the planning and zoning commission as provided under KRS 278.704(3).*

COMPLIANCE: The Project is located in Muhlenberg County, which has not enacted any planning and zoning regulations for the Project location. Muhlenberg County is a member of a Joint Planning Commission. There are no setback requirements established by a planning and zoning commission for the Project location and no noise control ordinance applicable to the project.

Lost City Renewables LLC certifies that the Project will follow all local ordinances and regulations concerning noise control, and with any applicable local planning and zoning ordinances in existence at the time of filing of the application. A statement certifying these facts is submitted as Attachment D.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

5. Setback Requirements

REQUIREMENT: per KRS 278.706(2)(e); *If the facility is not proposed to be located on a site of a former coal processing plant and the facility will use on-site waste coal as a fuel source or in an area where a planning and zoning commission has established a setback requirement pursuant to KRS 278.704(3), a statement that the exhaust stack of the proposed facility and any wind turbine is at least one thousand (1,000) feet from the property boundary of any adjoining property owner and all proposed structures or facilities used for generation of electricity are two thousand (2,000) feet from any residential neighborhood, school, hospital, or nursing home facility, unless facilities capable of generating ten megawatts (10MW) or more currently exist on the site. If the facility is proposed to be located on a site of a former coal processing plant and the facility will use on-site waste coal as a fuel source, a statement that the proposed site is compatible with the setback requirements provided under KRS 278.704(5). If the facility is proposed to be located in a jurisdiction that has established setback requirements pursuant to KRS 278.704(3), a statement that the proposed site is in compliance with those established setback requirements:*

COMPLIANCE: The Project is not proposed to be located on the site of a former coal processing plant, nor will it use any waste coal as a fuel source. No existing electricity generating facilities are on-site at the Project location.

The Project will not include any exhaust stacks or wind turbines as part of the facility, and therefore there is no established 1,000-foot setback requirements from the property boundary of any adjoining property owner to the energy generating facilities.

In addition, the Project does not have any residential neighborhood, school, hospital, or nursing home facility within 2,000 feet from facilities to be used for generation of electricity (Attachment B). Specifically, there are no populated areas within 2,000 feet of five (5) or more acres in relevant parcels containing at least one (1) residential structure per acre. Therefore, no deviation from the statutory setbacks is required to be obtained.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

6. Public Notice Report

REQUIREMENT: per KRS 278.706(2)(f); *A complete report of the applicant's public involvement program activities undertaken prior to the filing of the application, including:*

- 1. The scheduling and conducting of a public meeting in the county or counties in which the proposed facility will be constructed at least ninety (90) days prior to the filing of an application, for the purpose of informing the public of the project being considered and receiving comment on it;*
- 2. Evidence that notice of the time, subject, and location of the meeting was published in the newspaper of general circulation in the county, and that individual notice was mailed to all owners of property adjoining the proposed project at least two (2) weeks prior to the meeting; and*
- 3. Any use of media coverage, direct mailing, fliers, newsletters, additional public meetings, establishment of a community advisory group, and any other efforts to obtain local involvement in the siting process*

COMPLIANCE: Lost City Renewables has made efforts to engage the public and local officials in multiple ways regarding the Project. An account of those efforts is provided below.

A public meeting was held on October 29, 2024 at 6:00 pm CDT to inform the public about the Project (Attachment E). This meeting was held at the Penrod Baptist Church, which is located near the Project in Penrod, Muhlenberg County, Kentucky. A notice announcing the public meeting was published in the News-Leader, the local newspaper, on Tuesday, October 15, 2024; on the same day, letters were mailed to adjacent and nearby owners (not just adjoining property owners), and proof of the newspaper notice advertisement is contained in Attachment E. A Project website was also developed providing information about the Project and the public meeting (<https://lostcitysolar.com/>).

The Applicant conducted a public information meeting in the form of an open house. Project representatives and subject matter experts provided information in the development, permitting, construction, and operation of the proposed Project. Attendees were able to view Project maps, ask questions, and take home Project materials. Please see Attachment E for copies of the materials provided at the public information meeting. In the public meeting, attendees were invited to examine various posterboard stations on topics including Applicant company information, a Project map and design overview, permitting process and timeline, environmental studies, Project equipment, local economic benefits, and visual renderings. The public information meeting was well attended by landowners, neighbors, public officials, and others (over 100 people attended).

The meeting also afforded attendees an opportunity for conversations with representatives of Lost City about questions and concerns.

The following is a brief list of various outreach activities/meetings with local government representatives, stakeholders, and other interested parties undertaken prior to the submission of this Application:

Local Officials and Agencies

Mack McGehee, Judge Executive

Malcolm West, Magistrate

Darrin Benton, Magistrate

Jeff Vincent, Magistrate

Keith Phillips, Magistrate

Andrew Bullock, Magistrate

State Representative Melinda Prunty (retired)

Judge Executive Curtis McGehee (retired)

Ryan Rice, County Attorney

Belinda McKinney, Property Valuation Administrator

William Ward, Muhlenberg County Sheriff

Ray Hagerman, Executive Director, Muhlenberg Economic Growth Alliance (MEGA)

Muhlenberg County Tourism

Muhlenberg County Fire and EMS Department

Central City Fire Department

Greenville Fire Department

Dunmor Fire Department

Interested Parties and Nearby Landowners

Clifton King

Brad Reed

Aaron Cobb

Clarence Bivins

Harold Gardner

Michael Saye

Penrod Baptist Church

Kentucky Laborers District Council

Lost City also provided copies of support letters (Attachment E).

Lost City will continue these efforts and will participate in any public notice, comment and hearings which may be initiated as part of ongoing permitting activities.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

7. Efforts to locate near Existing Electric Generation

REQUIREMENT: per KRS 278.706(2)(g); *A summary of the efforts made by the applicant to locate the proposed facility on a site where existing electric generating facilities are located;*

COMPLIANCE: It is rare for utility-scale solar projects to be co-located with existing electricity generating infrastructure, such as a coal or natural gas fired power plant. Efforts were made to site the Project where there is existing electricity transmission infrastructure.

The project will interconnect to an existing substation and transmission line owned by TVA.

Sean Joshi

Developer

Lost City Renewables LLC

8. Proof of Service to County and Municipality Officials

REQUIREMENT: per KRS 278.706(2)(h); *Proof of service of a copy of the application upon the chief executive officer of each county and municipal corporation in which the proposed facility is to be located, and upon the chief officer of each public agency charged with the duty of planning land use in the jurisdiction in which the facility is proposed to be located;*

COMPLIANCE: A copy of the Siting Board application for Lost City Renewables LLC will be electronically transmitted to the Muhlenberg County Judge/Executive and Joint Planning Commission Chair on the date of electronic filing of this application.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

9. Effect on Kentucky Electricity Generation System

REQUIREMENT: per KRS 278.706(2)(i); *An analysis of the proposed facility's projected effect on the electricity transmission system in Kentucky;*

COMPLIANCE: To interconnect new generation facilities to the electric transmission grid in the Project area, a facility owner must obtain approval from the TVA to accept additional electricity generation.

The interconnection process includes completion of studies by TVA that determine the transmission upgrades required for a project to reliably interconnect to the TVA substation and grid. These studies are completed in a series. The Feasibility Study, the System Impact Study, and the Facilities Study are designed to provide developers with increasingly refined information regarding the scope of required upgrades, completion deadlines, and implementation costs. The Project will be capable of generating up to 250 MW of renewable energy and will interconnect with the TVA transmission system.

Interconnection Details:

The Project plans to connect to TVA's Lost City substation located at 2557 Lost City Road, Lewisburg, KY 42256. The Project will need approximately 10.8 miles of private 161 kilovolt (kV) transmission line generation interconnection (gen-tie) to connect to the Lost City substation from the Project site. The Project is completing necessary easement agreements to authorize the gen-tie.

Site Transformer Station:

The Lost City Solar project will construct an on-site transformer station that will step up the voltage of the power generated by the solar facility to 161 kV.

TVA Interconnection Status:

The Project has filed an application as a part of the TVA Large Generator Interconnection Procedures requirements. Accordingly, the Project is currently placed in the TVA's Interconnection queue. At the time of filing this application, the project has entered the TVA Transitional Serial Cluster Facilities Study process. The executed Transitional Serial Cluster Facilities Study Agreement is enclosed in Attachment F. Additional TVA studies will be provided when they are completed.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

10. Effect on Local and Regional Economies

REQUIREMENT: per KRS 278.706(2)(j); *An analysis of the proposed facility's economic impact on the affected region and the state;*

COMPLIANCE: See Attachment G for an economic analysis on the projected impact of the Project on local and regional economies, written by Paul A. Coomes, Ph.D., an Emeritus Professor of Economics from the University of Louisville.

On page 1 of the report, it states:

There are two primary impacts expected from the project. First, there will be a spike in construction and linked jobs as the site is built out over approximately one year. Using estimates of the construction payroll, Dr. Coomes estimates that there will be a total (direct and spinoff) of approximately 739 new construction and spinoff jobs in Muhlenberg County in year one, with new labor income around \$41.0 million.

Looking out over four decades, and including the impacts of construction, Dr. Coomes estimate there is a net gain of approximately 839 job-years and around \$44.9 million in labor income to Muhlenberg County.

Second, Lost City is pursuing an Industrial Revenue Bond (IRB) with the County Fiscal Court. According to the 2023 property tax bills for the five land parcels at the site, the total real estate property tax payments were \$14,500. Lost City anticipates that the IRB and Payment in Lieu of Taxes (PILOT) agreement would generate payments to the County of approximately \$250,000 - \$300,000 annually over the life of the Project.

Person Responsible:

Dr. Paul Coomes

Consulting Economist

11. Record of Environmental Violations

REQUIREMENT: per KRS 278.706(2)(k); *A detailed listing of all violations by it, or any person with an ownership interest, of federal or state environmental laws, rules, or administrative regulations, whether judicial or administrative, where violations have resulted in criminal convictions or civil or administrative fines exceeding five thousand dollars (\$5,000). The status of any pending action, whether judicial or administrative, shall also be submitted;*

COMPLIANCE: Neither Lost City Renewables LLC nor any entity with direct ownership interest in the Project, has violated any state or federal environmental laws or regulations. There are no pending actions against Lost City Renewables LLC nor any entity with ownership interest in the Project.

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

12. Site Assessment Report

REQUIREMENT: per KRS 278.706(2)(1); *A site assessment report as specified in KRS 278.708. The applicant may submit and the board may accept documentation of compliance with the National Environmental Policy Act (NEPA) rather than a site assessment report*

COMPLIANCE: The Site Assessment report is being contemporaneously filed herewith; please see the separately filed document titled “Lost City Renewables LLC: Site Assessment Report.”

Person Responsible:

Marty Marchaterre

Senior Environmental Planner

Copperhead Environmental Consulting, Inc.

13. Decommissioning Plan

REQUIREMENT: *A decommissioning plan that shall describe how the merchant electric generating facility will be decommissioned and dismantled following the end of its useful life. The decommissioning plan shall, at a minimum, include plans to:*

- 1. Unless otherwise requested by the landowner, remove all above-ground facilities;*
- 2. Unless otherwise requested by the landowner, remove any underground components and foundations of above-ground facilities. Facilities removed under this subparagraph shall be removed to a depth of three (3) feet below the surface grade of the land in or on which the component was installed, unless the landowner and the applicant otherwise agree to a different depth;*
- 3. Return the land to a substantially similar state as it was prior to the commencement of construction;*
- 4. Unless otherwise requested by the landowner, leave any interconnection or other facilities in place for future use at the completion of the decommissioning process;*
- 5. Secure a bond or other similar security for the project to assure financial performance of the decommissioning obligation, provided that:*
 - a. The amount of the proposed bond or similar security shall be determined by an independent, licensed engineer who is experienced in the decommissioning of solar electric generating facilities and has no financial interest in either the merchant electric generating facility or any parcel of land upon which the merchant electric generating facility is located. The proposed amount of the bond or similar security shall be either:*
 - i. The net present value of the total estimated cost of completing the decommissioning plan, less the current net salvage value of the merchant electric generating facility's components; or*
 - ii. The bond amount required by a county or municipal government that has established a decommissioning bond requirement or similar security obligation in the county or municipality where the merchant electric generating facility will be located. If the facility will be located in more than one (1) county or municipality that has established a decommissioning bond or similar security obligation, then the higher amount shall be required for the facility;*
 - b. The bond or other similar security names:*
 - i. For property that is leased by the applicant, each landowner from whom the applicant leases land and the Energy and Environment Cabinet as the primary co-beneficiaries; or*
 - ii. For property that is owned by the applicant, the Energy and Environment Cabinet as the primary beneficiary;*

c. If the merchant electric generating facility is to be located in a county or municipality that has not established a decommissioning bond or other similar security obligation, the bond or other similar security shall name the county or municipality as a secondary beneficiary with the county's or municipality's consent;

d. The bond or other similar security shall be provided by an insurance company or surety that shall at all times maintain at least an "Excellent" rating as measured by the AM Best rating agency or an investment grade credit rating by any national credit rating agency and, if available, shall be noncancelable by the provider or the customer until completion of the decommissioning plan or until a replacement bond is secured; and

e. The bond or other similar security shall provide that at least thirty (30) days prior to its cancellation or lapse, the surety shall notify the applicant, its successor or assign, each landowner, the Energy and Environment Cabinet, and the county or city in which the facility is located of the impending cancellation or lapse. The notice shall specify the reason for the cancellation or lapse and provide any of the parties, either jointly or separately, the opportunity to cure the cancellation or lapse prior to it becoming effective. The applicant, its successor, or its assign, shall be responsible for all costs incurred by all parties to cure the cancellation or lapse of the bond. Each landowner, or the Energy and Environment Cabinet with the prior approval of each landowner, may make a demand on the bond and initiate and complete the decommissioning plan.

6. Communicate with each affected landowner at the end of the merchant electric generating facility's useful life so that any requests of the landowner that are in addition to the minimum requirements set forth in this paragraph and in addition to any other requirements specified in the lease with the landowner may, in the sole discretion of the applicant or its successor or assign, be accommodated; and

7. Incorporate the requirements of paragraphs (m)1. to 6. of this subsection into the applicant's leases with landowners.

COMPLIANCE: Lost City Renewables LLC has prepared a decommissioning plan that is consistent with these requirements, see Attachment H

Person Responsible:

Sean Joshi

Developer

Lost City Renewables LLC

14. Cumulative Environmental Assessment Summary

REQUIREMENT: per KRS 224.10-280; *Cumulative environmental assessment and fee required before construction of facility for generating electricity -- Conditions imposed by cabinet -- Administrative regulations.*

(1) Except for a person that commenced construction of a facility prior to April 15, 2002, or that has received a certificate of public convenience and necessity from the Public Service Commission prior to April 15, 2002, no person shall commence to construct a facility to be used for the generation of electricity unless the person:

(a) Submits a cumulative environmental assessment to the cabinet with the permit application; and

(b) Remits a fee set pursuant to KRS 224.10-100(20) by the cabinet to defray the cost of processing the cumulative environmental assessment.

(2) The person may submit and the cabinet may accept documentation of compliance with the National Environmental Policy Act (NEPA) as satisfying the requirements to file a cumulative environmental assessment under subsection (1) of this section.

(3) The cumulative environmental assessment shall contain a description, with appropriate analytical support, of:

(a) For air pollutants:

1. Types and quantities of air pollutants that will be emitted from the facility; and

2. A description of the methods to be used to control those emissions;

(b) For water pollutants:

1. Types and quantities of water pollutants that will be discharged from the facility into the waters of the Commonwealth; and

2. A description of the methods to be used to control those discharges;

(c) For wastes:

1. Types and quantities of wastes that will be generated by the facility; and

2. A description of the methods to be used to manage and dispose of such wastes; and

(d) For water withdrawal:

1. Identification of the source and volume of anticipated water withdrawal needed to support facility construction and operations; and

2. A description of the methods to be used for managing water usage and withdrawal.

(4) The cabinet may impose such conditions regarding the timing, volume, duration, or type of pollutants on a permit, registration, general permit, or permit-by-rule for a facility subject to this section as are necessary to comply with applicable standards.

(5) The cabinet may promulgate administrative regulations to implement the provisions of this section.

COMPLIANCE: Lost City's Cumulative Environmental Assessment (CEA) is attached as Attachment I.

a) Air Pollutants

The Project will generate transient air pollutant emissions during construction and operation activities. Air quality impacts will primarily result from the staging and operation of construction vehicles, equipment, supply deliveries, and worker personnel vehicles. The daily workforce for the Project during construction will vary depending on specific construction activities occurring on individual days. It is estimated that the work force will comprise up to 300 to 400 construction workers onsite at any time during the 12- to 18-month construction period. Construction and operation equipment will include, but not be limited to, bulldozers, backhoes, forklifts, bobcats, generators, pile drivers, semi-trucks, and flatbed trucks. Weather conditions may also affect air pollutant emissions. No air quality permit is required for construction or operation activities.

Construction activities will result in temporary fugitive air pollutant emissions (e.g., small particles suspended in the air or dust). Vehicles and construction equipment traveling over unpaved roads and the construction site will result in the emission of fugitive dust. Most fugitive emissions from vehicle traffic in unpaved areas will be deposited near the unpaved areas. To minimize fugitive dust impacts, the Project will require all contractors to keep construction equipment properly maintained and to use BMPs, such as covered loads and wet dust suppression if needed, which can reduce fugitive dust emissions by as much as 95 percent. Re-vegetation of disturbed areas in compliance with Kentucky Division of Water (KDOW) Construction Storm Water Discharge General Permit will also help minimize emission of fugitive dust.

Air quality impacts from construction activities will be temporary and will depend on both man-made factors (intensity of activity, control measures, etc.) and natural factors such as wind speed and direction, soil moisture, and other factors. However, even under unusually adverse conditions, emissions will have, at most, a minor transient impact on off-site air quality and will be well below the applicable NAAQS. Overall, the potential impacts to air quality from construction activities for the Project will be minor.

Once constructed, the solar panels will produce zero emissions during operation. Therefore, the solar facility is not expected to emit any of the following criteria pollutants: PM, CO, SO₂, NO_x, VOCs, or lead. Similarly, the facility is also not expected to emit Hazardous Air Pollutants (HAPs).

During operation, the solar facility will only generate air emissions from worker vehicles and

equipment for maintenance activities, such as mowers to control growth of vegetation. Project operations are expected to require 2 to 3 workers on site intermittently. These workers primarily will drive in and out, Monday through Friday during business hours. Employees are anticipated to use mid- or full-sized trucks. The Project will be monitored offsite 24/7, and maintenance workers will be sent to the site if any changes in production or equipment errors are detected remotely. Inspections will include identifying any physical damage to panels, wiring, inverters, pad mount transformers, interconnection equipment, and security fencing that would need repairs or replacement.

Additionally, grounds maintenance will be performed through an integrated land management approach, to include biological (sheep for regenerative agriculture) and mechanical control of vegetation, with herbicide applications as appropriate to control regulated noxious weeds per local, state, and federal regulations. It is anticipated that using sheep grazing to control vegetation and/or trimming and mowing will likely be performed periodically, approximately 20-30 times per year depending on growth rate, to maintain a maximum height of 10 inches to avoid shading the panels and comply with county regulations.

It is anticipated that there will also be benefits to air quality because, compared to fossil fuel sources that produce emissions, the solar panels produce zero emissions while generating electricity. This benefit to local and regional air quality will occur over the life of the Project.

b) Water Pollutants

Lost City Renewables expects the Project to result in the discharge of stormwater during construction. Lost City Renewables intends to comply with the KDOW's Construction Storm Water Discharge General Permit for those construction activities that disturb one acre or more. Lost City Renewables will submit a Notice of Intent to KDOW at least seven days prior to the commencement of construction and KDOW will review the notice of intent and provide notification of authorization to discharge. When construction is completed, Lost City Renewables will provide a notice of termination upon completion.

To manage stormwater, use of BMPs, including silt fences, on-site temporary sediment basins, sediment traps, and/or buffer zones (e.g., 25 feet) surrounding jurisdictional streams and wetlands will be implemented. A site-specific stormwater pollution prevention plan (SWPPP) will be prepared and a copy will be kept on site. These stormwater BMPs will minimize sediment from entering Waters of the Commonwealth and sediment migration off site during construction, prior to achievement of final vegetative stabilization.

Disturbed areas will be seeded after construction using a mixture of low-growing grass and herbaceous plant seed per the project planting plan. Erosion control measures will be inspected and maintained until vegetation in the disturbed areas has returned to the preconstruction conditions or the Project Site is stable. Water may be used for soil compaction and dust control during construction.

Additionally, the Project will not generate wastewater during construction or operation. The primary sources of waste during Project operation are expected to be the maintenance of

equipment, vehicles, and machinery and the replacement of damaged materials and materials that have reached the end of their serviceable life. Maintenance machinery and vehicles will include semi-trucks, work trucks, and other equipment that uses gasoline, diesel, engine oil, and other petroleum-based products. The risk of spills will be limited through the use of safe refueling practices and in the event of spill the appropriate measures will be taken to remediate. The use of a spill prevention, control and countermeasure (SPCC) plan will reduce leaks and spills and minimize the potential for adverse impacts to surface and groundwater.

Following the establishment of vegetation on disturbed areas and to minimize potential for water impacts, most vegetation control will be performed biologically (i.e., sheep) with mechanically (i.e., mowing) as appropriate; however, limited amounts of herbicides will be used around posts or in areas that are not able to be grazed or mowed. Only EPA-registered and approved herbicides will be used in accordance with label directions designed in part to restrict applications near receiving waters and to prevent unacceptable aquatic impacts. All herbicides will be applied by Kentucky licensed and certified commercial pesticide applicators.

Approximately 20-25 acres of the Project Site will be used as construction assembly areas (also called staging or laydown areas) for worker assembly, vehicle parking, and material storage during construction. Some of these areas will be staged within the areas proposed for the solar arrays. The laydown areas will be on site for the duration of construction. Temporary construction trailers intended for material storage and office space will be parked on site. Following completion of construction activities, trailers, unused materials, and construction debris will be removed from the Project Site.

Once construction is complete, the operations and maintenance of the solar facility will have little to no impacts on surface water, and BMPs will be used during any maintenance activities that have the potential to cause runoff of sediment and pollutants. Beneficial indirect impacts to surface water are anticipated due to reduction in fertilizer and pesticide use compared with current agricultural use.

No direct adverse impacts to groundwater are anticipated. The solar panels will have a relatively minor effect on groundwater infiltration and surface water runoff because the panels will not include a runoff collection system. Rainwater will drain off the panels to the adjacent vegetated ground.

Portable chemical toilets will be provided on site for construction workers during Project development. Sewage will be pumped out by a licensed contractor and the sewage waste will be disposed of at the Central City Wastewater Treatment Plant or other regulated wastewater treatment plant. No adverse effects are anticipated from wastewater treatment and disposal.

c) Wastes

Waste will be generated during Project construction and operation and will be handled and disposed of in accordance with local, state, and federal regulations. Construction activities will generate solid waste consisting of construction debris and general trash, including wooden crates, pallets, flattened cardboard module boxes, plastic packaging, and excess electrical wiring. To the

extent feasible and practicable, construction waste will be recycled and material that cannot be recycled will be disposed of offsite at a permitted facility to be determined by the designated contractor(s). No waste will be disposed of on the Project Site. Designated construction contractor and subcontractor personnel will be responsible for daily inspection, cleanup, and proper labeling, storage, and disposal of all refuse and debris produced. Disposal containers such as dumpsters or roll-off containers will be obtained from a proper waste disposal contractor and will be located in the on-site staging area or other areas, as appropriate. Records of the amounts generated will be maintained by Lost City Renewables.

During Project construction, materials will be stored on site in storage tanks, vessels, or other appropriate containers specifically designed for the characteristics of these materials. The storage facilities will include secondary containment in case of tank or vessel failure. Construction-related materials stored on site will primarily be liquids such as used oil, diesel fuel, gasoline, hydraulic fluid, and other lubricants associated with construction equipment. Safety Data Sheets for all applicable materials present on site will be made readily available to on-site personnel.

Construction activities will involve the use of machinery (e.g., backhoes, generators, pile drivers, and flatbed trucks) fueled by petroleum products. Fueling of construction-related equipment and vehicles will occur in designated areas. Other mobile equipment will return to the on-site laydown areas for refueling. Construction contractors will be responsible for preventing spills by implementing the SPCC including proper storage and handling procedures. The SPCC will include special procedures to minimize the potential for fuel spills, and spill control kits will be carried on all refueling vehicles for activities such as refueling, vehicle or equipment maintenance, waste removal, and tank clean-out.

Small quantities (less than 55 gallons, 500 pounds or 200 cubic feet) of janitorial supplies, paint, degreasers, herbicides, pesticides, air conditioning fluids (chlorofluorocarbons [CFCs]), gasoline, hydraulic fluid, propane, and welding rods typical of those purchased from retail outlets may also be stored and used at the facility. Due to the small quantities involved, the controlled environment, and implementation of proper cleanup procedures, significant environmental impacts caused by a potential spill are not anticipated.

Facility personnel will be supplied with appropriate personal protective equipment (PPE) and will be properly trained in the use of PPE as well as the handling, use, and cleanup of hazardous materials used at the facility and the procedures to be followed in the event of a leak or spill. Adequate supplies of appropriate cleanup materials will be stored on site.

Waste generation during operation will be minimal and will mainly result from the maintenance and/or replacement of worn or broken equipment and defective or broken electrical materials. All wastes will be managed by a licensed waste management company(ies) and disposed of in accordance with applicable federal and state requirements to minimize health and safety effects.

Based on a review of potential waste generation activities, no adverse effects from general waste management are anticipated.

d) Water Withdrawal

Water supply wells were identified on the Project Site. Aquifers beneath the Project have sufficient permeability to conduct groundwater and to allow economically significant quantities of water to be produced by man-made water wells. Water needed for construction and operation will be brought in, obtained from nearby existing wells, or provided by developing a new water supply well.

Construction-related water use will support site preparation (including dust control) and grading activities. During earthwork for the grading of access roads, foundations, equipment pads, and other components, the primary use of water will be for compaction and dust control. Smaller quantities will be required for preparation of the equipment pads, equipment washing, and other minor uses. BMPs outlined in the SWPPP will be followed for using water to clean equipment and appropriately disposing of this wastewater. The expected water volume needed for construction activities is not expected to adversely affect local or regional water resources.

The internal access roads will not be heavily traveled during normal operation, and consequently, water use for dust control is not expected. Equipment washing and any potential dust control discharges will be handled in accordance with BMPs described in the SWPPP for water-only cleaning.

Operation of solar electricity generating facilities is not water-intensive. Precipitation in the region is typically adequate to remove dust and other debris from the solar panels while maintaining energy production; therefore, manual panel washing with water or any other substance is likely not part of regular maintenance. Additionally, rain will contribute to ongoing vegetation management. Some water may be needed for vegetation management, including during screening vegetation installation and during prolonged times of drought.

The CEA itself is being submitted separately to the Kentucky Energy and Environment Cabinet.

Person Responsible:

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