MYSO, LLC
Response to Siting Board Staff's First Request for Information
Case No. 2025-00395

Request No. 1:

Submit a copy of the leases or purchase agreements, including options, separate agreements, or deeds which MYSO has entered into in connection with the proposed solar facility, including the agreements for each of the parcels of the project.

Response:

Please find Mayfield Solar's redacted site control agreements attached separately due to file size limits.

Responding Witness: Jacqui Kitchen

Request No. 2:

Detail any contracts by which MYSO has paid, has negotiated to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near the project. Include the terms of the agreements and which properties are involved, in terms of distance, to the project boundaries.

Response:

Mayfield Solar has entered into Good Neighbor Agreements with nine adjacent property owners. Redacted copies of those agreements are attached.

Responding Witness: Jacqui Kitchen

Request No. 3:

State whether a Cumulative Environmental Analysis (CEA) has been completed for the Project. If so, provide that document.

Response:

Please see attached.

Responding Witness: Bob Roy

Cumulative Environmental Assessment

Mayfield Solar Project

Graves County, Kentucky

February 2026

Prepared for

MYSO, LLC
515 N Flagler Dr. Suite 250
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Prepared by

TETRA TECH

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Acronyms and Abbreviations

Applicant	MYSO, LLC
BMP	Best management practice(s)
CAA	Clean Air Act
CEA	Cumulative Environmental Assessment
CFC	chlorofluorocarbons
CO	Carbon monoxide
EPA	U.S. Environmental Protection Agency
KDOW	Kentucky Division of Water
MWac	Megawatts, alternating current
NAAQS	National Ambient Air Quality Standards
NO_x	Nitrous oxides
O_3	Ozone
Pb	Lead
PJD	Preliminary Jurisdictional Determination
$PM_{2.5}$	Particulate matter less than 2.5 microns in diameter
Project	Mayfield Solar Project
PV	Photovoltaic
SO_2	Sulfur dioxide
SPCC	Spill Prevention, Containment, and Countermeasures Plan
SWPPP	Stormwater Pollution and Prevention Plan
Tetra Tech	Tetra Tech, Inc.
USACE	U.S. Army Corps of Engineers

1.0 INTRODUCTION

MYSO, LLC (Applicant) is proposing to build an up to a 200-megawatt AC (MWac) photovoltaic (PV) solar generation facility on an approximately 1,342-acre portion of prior agricultural land that was targeted for industrial development by the Purchase Area Regional Industrial Authority (Project) in Graves County, Kentucky.

This Cumulative Environmental Assessment (CEA) has been prepared on behalf of the Applicant by Tetra Tech, Inc. for submittal to the Kentucky Energy and Environment Cabinet. In compliance with KRS 224.10-280[1], this report evaluates the Project's potential to cause air pollutants, water pollutants, wastes, and water withdrawal.

2.0 AIR POLLUTANTS

The Clean Air Act (CAA) regulates the emission of air pollutants and enabled the U.S. Environmental Protection Agency (EPA) to establish the National Ambient Air Quality Standards (NAAQS). The criteria pollutants regulated by NAAQS include ozone (O_3), particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), carbon monoxide (CO), nitrous oxides (NO_x), sulfur dioxide (SO_2), and lead (Pb).

Geographic areas are designated as attainment, nonattainment, or unclassified[2] based on NAAQS. Areas with ambient concentrations of the aforementioned pollutants that exceed the NAAQS are designated as nonattainment areas, and emissions sources within these areas are typically subject to more stringent air permitting requirements.

Graves County, Kentucky is designated as within attainment for all criteria pollutants (EPA 2026).

Project site preparation and construction will produce temporary air pollutant emissions; these emissions would result from operation of construction equipment, ground-disturbing activities, and worker and delivery vehicles. The amount of increased air pollutant emissions will vary by weather conditions and occurring construction activities. Despite the anticipated increased air pollutant emissions due to site preparation and construction activities, Project emissions would remain well below the NAAQS. All contractors involved with Project site preparation and construction will be required to implement best management practices (BMPs) to reduce dust or air quality impacts to the greatest extent practicable. These include cleaning and properly maintaining construction equipment, re-vegetating disturbed areas, covering soil piles and truck loads, and wet dust suppression.

Vegetation and tree clearing associated with Project construction is expected to be minimal as majority of the site is open land that has been historically used for agricultural row crops. Any vegetative debris accumulated during construction and site preparation will be chipped, ground, and composted on site or will be managed at an offsite facility.

[1] https://apps.legislature.ky.gov/law/statutes/statute.aspx?id=10323

[2] Attainment: Any area that meets the national primary or secondary ambient air quality standard for a NAAQS.
Nonattainment: Any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for a NAAQS.
Unclassified: An area that cannot be designated based on available information as meeting or not meeting the NAAQS.

Once constructed, the Project will not produce any impactful emissions during operation. The only negligible emissions associated with the facility will be from use of maintenance vehicles and personal transportation vehicles by workers performing routine operations. Limited site visits are expected, and will be for the purposes of inspections, equipment maintenance, and vegetation management.

3.0 WATER POLLUTANTS

3.1 Surface Water

Surface water is any water found on the earth's surface. The Project is located within the Carney Creek-Mayfield Creek watershed (12-digit HUC: 080102010201) which drains to Mayfield Creek (KDOW 2026). No waterways within or adjacent to the Project are designated as Outstanding State Resource Waters or other Special Use Waters as defined by the Kentucky Division of Water (KDOW 2020). If Project activities or construction occur within surface waters, an Individual Water Quality Certification from KDOW will be obtained.

Bacon, Farmer, Workman Engineering and Testing, Inc. (BFW) conducted a delineation of Wetlands and Waters of the United States (U.S.) at the Project site on behalf of the Applicant. This investigation was performed with the goal of informing Project development and in support of a Preliminary Jurisdictional Determination (PJD). If any impacts to wetlands and waters are necessary and unavoidable, the Applicant will pursue the appropriate permits through the U.S. Army Corps of Engineers (USACE) and KDOW.

Floodplains were identified within the Project. All necessary floodplain development permits will be obtained by the Project prior to construction.

To minimize the potential of construction activities resulting in increased erosion and sedimentation impacting onsite streams and wetlands, the Project is designed with the existing topography being utilized to the greatest extent practicable, resulting in minimal grading and ground disturbance. The Project is expected to yield stormwater discharge during construction; the Applicant will comply with KDOW's Construction Storm Water Discharge General Permit for any construction activities that disturb an acre or more. A Notice of Intent will be submitted to KDOW before any work begins on the site, and the Project will submit a Notice of Termination to KDOW once work is complete.

Stormwater discharge will be mitigated utilizing measures such as silt fences, temporary sediment basins and traps, buffer zones around streams and wetlands, and other BMPs to minimize the impacts of stormwater runoff. The Applicant will prepare a Stormwater Pollution Prevention Plan (SWPPP) to be implemented throughout all ground-disturbing activities in compliance with KDOW requirements. These BMPs will be used from construction through final vegetative stabilization to prevent degradation and minimize sediment runoff from the Project into Waters of the United States and the Commonwealth.

All disturbed areas will be revegetated using a mixture of low growing, non-invasive grass and herbaceous plant seed mix that will be certified weed-free by a reputable dealer. All plantings and other erosion control measures will be inspected and maintained until they are deemed stable.

If necessary, only herbicides that are EPA-approved would be utilized for vegetation control on the site. Any herbicides used will be applied in accordance with label directions to limit any applications near Waters of the United States or the Commonwealth.

After completing construction activities, the Project will have little to no impact on surface waters during operations and maintenance. BMPs will be utilized during any activities that may cause runoff of sediments or pollutants. The reduction in chemical use and animal wastes related to the agricultural activities currently occurring on the site may have beneficial impacts to surface water resources in and adjacent to the Project.

3.2 Groundwater

Groundwater is any water found under the earth's surface. Groundwater is frequently used as a source of drinking water, and any pollution or contamination poses a potential risk to these waters and thus poses a potential health risk to nearby populations. The main source of these contaminants in the vicinity of the Project is agricultural activities.

Precipitation that runs off of the solar panels will not pose a risk to groundwater, as solar panels are sealed and do not leach contaminants. Hazardous materials used during construction that could potentially contaminate groundwater such as fuels, lubricants and other fluids will be stored on site. As an added precaution, contractors will utilize BMPs to minimize the risk of leaks and spills and implement plans and procedures to immediately address any spills and leaks that may occur. These practices will limit the risk of potential impacts to groundwater.

The development and operation of the Project is not anticipated to have negative impacts to groundwater.

4.0 WASTE

All waste generated during the construction and operation of the Project will be disposed of in accordance with all local, state, and federal regulations.

Waste generated during construction activities will include wooden crates, pallets, cardboard boxes, other packaging material, and general trash. Additionally, excess wiring and other random debris could be intermittently produced. No waste will be disposed of at the Project site. Where practicable, construction waste will be recycled, and any material that cannot be recycled will be disposed of offsite at a permitted facility. Construction contractors and subcontractors will be responsible for proper cleanup, disposal, and storage activities.

Primary construction materials stored on site will be liquids such as, used oil, diesel fuel, gasoline, hydraulic fluid, and other lubricants. Proper containers, specifically designed for management of such materials, will be located at onsite staging areas. The storage containers will have secondary containment in case of tank or vessel failure. Safety data sheets and any required training will be available to on-site personnel for all applicable materials.

Fueling of construction related machinery, such as tractors, trucks, and semi- trucks with petroleum-based fuels will take place on the Project site in specific designated areas. A Spill Prevention, Containment, and Countermeasures Plan (SPCC) will be developed and implemented to minimize the

potential for spills of hazardous materials and any resulting impacts. Additionally, spill control kits will be carried on all refueling vehicles.

Paint, degreasers, pesticides, herbicides, air conditioning fluids (chlorofluorocarbons [CFC]), gasoline, propane, hydraulic fluid, welding rods, and janitorial supplies may be stored on site in small quantities (less than 55 gallons, 500 pounds, or 200 cubic feet). No significant environmental impacts caused by a potential spill are anticipated due to the small quantity of materials and the containment and clean up procedures that will be implemented.

Additionally, portable chemical toilets will be placed on site for construction workers. Licensed contractors will be responsible for pumping sewage from the portable toilets. The sewage waste will be disposed of at a permitted location selected by the chemical toilet contractor. Permanent bathroom facilities are not anticipated.

Little to no waste is expected to be generated from the Project during the operations phase. Any waste generated during maintenance activities will be removed from the site and disposed of in accordance with state and federal regulations.

At the end of the Project's operational life, the Project will follow a decommissioning and site restoration plan to disconnect, remove, and recycle the solar array equipment and restore the site. Non-recyclable components will be disposed of in a suitable licensed facility. Once all equipment has been removed, the Site will be restored via topsoiling and seeding following the methodology set forth in the Project decommissioning plan.

No adverse effects from waste generation or disposal in relation to construction or operation of the Project are anticipated.

5.0 WATER WITHDRAWAL

At this time, it is anticipated that the Project's use of external water utility services would be limited to service to the Operations & Maintenance Building. If water service is required during construction or operations, the Project will use onsite well water or connect to the local water utility if services are available.

Water use related to construction activities will include site preparation such as dust control and grading activities. Proper BMPs outlined in the SWPPP will be followed during any equipment washing and potential dust control discharges. The volume of water required during the construction process is minimal and water resources are not anticipated to be adversely affected.

The Project will minimally and infrequently use water during normal operations and maintenance. Typical rainfall in the region is sufficient to remove dust and other debris from the PV panels. Otherwise, water may be used for vegetation management needs, including screening vegetation installation and during periods of drought.

6.0 CONCLUSION

Project construction and associated land disturbance associated with the proposed Project may result in temporary impacts to environmental resources. The Project will utilize BMPs to minimize

potential impacts, including dust minimization measures, erosion control measures, and stormwater control measures. The Project will comply with all KDOW and Kentucky Pollutant Discharge Elimination System (KPDES) requirements. Material containment will abide by the appropriate measures and safe storage requirements through a SPCC Plan. The Project will not generate wastewater during construction or operation. Material waste will be disposed of at appropriate disposal or recycling facilities. Water withdrawal necessary for construction of the Project will source from existing on-site wells or the local water utility if service is available to the area.

7.0 REFERENCES

Kentucky Administrative Regulations (KAR). 2020. 401 KAR 10:026 – Designation of uses of surface waters. Table C: Waters with Added Designated Uses. Available online at: https://apps.legislature.ky.gov/law/kar/titles/401/010/026/ .

Kentucky Division of Water (KDOW). 2026. KY Watershed Explorer. Available online at: https://experience.arcgis.com/experience/a8a017332225466b9f25a2ed11c21a7c/page/GW%2FSW-Explorer/

U.S. Environmental Protection Agency (EPA). 2026. AirData Air Quality Monitors Interactive Map. Retrieved from https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319

Request No. 4:

Referring to the Application, Description of Proposed Site, Item 3 stating that a separate application will be filed for the Project's unregulated transmission line. Provide an overview of the proposed unregulated transmission line to be constructed between the Project Substation and Point of Interconnect. Include in the response the anticipated route, length of the line, voltage, right-of-way setbacks, and other relevant details.

Response:

As provided in the Application, a separate application will be filed for the nonregulated transmission line which will provide the above-requested information in compliance with KRS 278.714. The proposed transmission line is anticipated to be 161 kV and approximately between 5 and 6 miles in length. The transmission line route is being finalized and will be provided in a separate application.

Responding Witness: Jacqui Kitchen

Request No. 5:

Provide a narrative description of the location for each of the following site features:

a. Each construction entrance.

b. Each entrance to be used in operations.

c. Operation & Maintenance (O&M) area.

d. Each laydown area.

Response:

a. Mayfield will utilize 32 Access Gate (AG) entrances for Project construction:

i. Fifteen entrances connect to E Baldree Road, which connects directly to KY 45 or KY 849 as follows:

1. AG-1 is located on the north side of Baldree Road, approximately 0.45 miles east of State Route 45.

2. AG-2 is located on the south side of E Baldree Road, approximately 0.2 miles east of KY 45.

3. AG-3 is located on the south side of E Baldree Road, approximately 0.5 miles east of KY 45.

4. AG-4 is located on the west side of E Baldree Road, approximately 0.8 miles east of KY 45.

5. AG-5 is located on the east side of E Baldree Road, approximately 0.7 miles east of KY 45.

6. AG-6 is located on the west side of E Baldree Road, approximately 1 mile east of KY 45.

7. AG-7 is located on the west side of E Baldree Road, approximately 0.95 miles east of KY 45.

8. AG-8 is located on the east side of E Baldree Road, approximately 1 mile east of KY 45.

9. AG-9 is located on the east side of E Baldree Road, approximately 0.95 miles east of KY 45.

10. AG-13 is located on the east side of E Baldree Road, approximately 0.75 miles east of KY 45.

11. AG-14 is located on the east side of E Baldree Road, approximately 0.9 miles east of KY 45.

12. AG-15 is located on the west side of E Baldree Road, approximately 0.45 miles east of KY 849.

13. AG-16 is located on the west side of E Baldree Road, approximately 0.3 miles east of KY 849.

14. AG-17 is located on the east side of E Baldree Road, approximately 0.4 miles east of KY 849.

15. AG-18 is located on the east side of E Baldree Road, approximately 0.25 miles east of KY 849.

ii. Three entrances connect to E Pittman Road, which connects directly to KY 45 as follows:

1. AG-10 is located on the north side of E Pittman Road, approximately 0.25 miles east of KY 45.

2. AG-11 is located on the north side of E Pittman Road, approximately 0.3 miles east of KY 45.

3. AG-12 is located on the south side of E Pittman Road, approximately 0.45 miles east of KY 45.

iii. Five entrances connect to Whittemore Road, which connects directly to KY 849 or KY 1241 as follows:

1. AG-20 is located on the east side of Whittemore Road, approximately 0.2 miles south of KY 849.

2. AG-21 is located on the east side of Whittemore Road, approximately 0.3 miles south of KY 849.

3. AG-22 is located on the west side of Whittemore Road, approximately 0.6 miles south of KY 849.

4. AG-23 is located on the east side of Whittemore Road, approximately 0.6 miles south of KY 849.

5. AG-29 is located on the west side of Whittemore Road, approximately 0.7 miles east of KY 1241;

iv. Two entrances connect to Old Plant Road, which connects directly to KY 1241 as follows:

1. AG-24 is located on the north side of Old Plant Road, approximately 0.8 miles east of KY 1241.

2. AG-25 is located on the south side of Old Plant Road, approximately 0.5 miles east of KY 1241.

v. Four entrances connect to an unnamed farm road directly east of Whittemore Road and south of Old Plant Road, which connects directly to KY 1241 as follows:

1. AG-26 is located on the west side of the unnamed farm road, approximately 0.9 miles east of KY 1241.

2. AG-27 is located on the east side of the unnamed farm road, approximately 0.9 miles east of KY 1241.

3. AG-30 is located on the west side of the unnamed farm road, approximately 1 mile east of KY 1241.

4. AG-31 is located on the east side of the unnamed farm road, approximately 0.9 miles east of KY 1241.

vi. One entrance, AG-19, is located on the north side of KY 849, approximately 0.8 miles east of KY 1241.

vii. One entrance, AG-28, is located on the south side of McGee Road, approximately 0.4 miles east of KY 1241.

viii. One entrance, AG-32, is located on the north side of Olden Road, approximately 0.45 miles east of KY 1241.

b. The Project anticipates reducing the total number of entrances used during construction for Project operations. Specific operational access points will be determined at a later date.

c. The Operations and Maintenance area will be located on the east side of E Baldree Road, north of E Pittman Road. The area will consist of a permanent single-story structure and graveled parking area, constructed per the requirements of Graves County.

d. Temporary laydown areas will be located at the Proposed Project Substation Area, and at several locations throughout the site, fully within the Project's fence line as depicted on the site layout (SAR Attachment A). Final locations will be identified by the Project's EPC contractor.

Responding Witness: Ryan Turner

Request No. 6:

Explain whether neighbors or adjacent landowners will be affected by noise levels during pile driving.

Response:

Please see the discussion of noise impacts provided in SAR Attachment D, Noise Assessment Study. As noted there, impacts are expected to be temporary and will be mitigated by construction hours, distance from areas where pile driving may occur, and other proposed mitigation measures as discussed in the report. Environmental conditions such as wind may also impact noise levels at any given time during the construction phase.

Responding Witness: Matthew Batdorf

Request No. 7:

Provide a detailed table listing all residential structures within 2,000 feet of the Project boundary line. Indicate whether the residential structures are owned by participating or non-participating landowners.

Response:

See attached.

Responding Witness: Matt Batdorf

Residential Structures Within 2,000 Feet						
Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
1	R-1	Non-Participating	1,907	2,030	3,288	14,285
2	R-2	Non-Participating	1,868	2,129	3,845	14,195
3	R-3	Non-Participating	1,915	2,302	3,864	14,095
4	R-4	Non-Participating	1,861	2,227	3,823	14,085
5	R-5	Non-Participating	1,733	1,849	3,249	14,093
6	R-6	Non-Participating	1,720	2,051	3,696	14,004
7	R-7	Non-Participating	1,871	2,287	3,795	13,985
8	R-8	Non-Participating	1,817	2,214	3,760	13,984
9	R-9	Non-Participating	1,935	2,369	3,836	13,984
10	R-10	Non-Participating	1,759	2,137	3,717	13,973
11	R-11	Non-Participating	1,786	1,936	3,157	14,502
12	R-12	Non-Participating	1,872	2,322	3,751	13,872
13	R-13	Non-Participating	1,722	2,135	3,655	13,868
14	R-14	Non-Participating	1,808	2,273	3,667	13,771
15	R-15	Non-Participating	1,457	1,752	3,436	13,780
16	R-16	Non-Participating	1,770	2,244	3,612	13,700
17	R-17	Non-Participating	1,884	2,382	3,656	13,652
18	R-18	Non-Participating	1,197	1,314	2,785	13,557
19	R-19	Non-Participating	1,851	2,371	3,533	13,446
20	R-20	Non-Participating	1,598	2,100	3,380	13,429
21	R-21	Non-Participating	1,612	2,126	3,348	13,354
22	R-22	Non-Participating	1,034	1,450	2,989	13,275
23	R-23	Non-Participating	1,779	2,316	3,344	13,173
24	R-24	Non-Participating	1,532	2,062	3,194	13,157
25	R-25	Non-Participating	1,759	2,300	3,258	13,036
26	R-26	Non-Participating	1,508	2,048	3,087	12,997
27	R-27	Non-Participating	1,496	1,991	2,865	12,660
28	R-28	Non-Participating	1,905	2,263	3,132	12,686
29	R-29	Non-Participating	316	741	2,288	12,631
30	R-30	Non-Participating	1,307	1,779	2,652	12,511
31	R-31	Non-Participating	1,793	2,070	2,936	12,493
33	R-33	Non-Participating	85	303	1,412	12,521
34	R-34	Non-Participating	481	1,007	2,026	12,243
35	R-35	Non-Participating	1,198	1,491	2,364	12,216
36	R-36	Non-Participating	1,712	1,913	2,765	12,220
37	R-37	Non-Participating	1,499	1,709	2,572	12,197
38	R-38	Non-Participating	1,746	1,940	2,778	12,135
39	R-39	Non-Participating	1,653	1,841	2,671	12,011
40	R-40	Non-Participating	1,336	1,535	2,386	11,958

Residential Structures Within 2,000 Feet						
Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
41	R-41	Non-Participating	1,481	1,636	2,331	11,598
42	R-42	Non-Participating	1,700	2,081	2,637	11,503
43	R-43	Non-Participating	1,858	2,265	2,850	11,554
44	R-44	Non-Participating	1,604	1,970	2,510	11,448
45	R-45	Non-Participating	1,444	1,715	2,187	11,360
46	R-46	Non-Participating	1,247	1,507	1,951	11,162
47	R-47	Non-Participating	1,446	1,863	2,466	11,153
48	R-48	Non-Participating	1,061	1,386	1,907	10,970
49	R-49	Non-Participating	780	1,093	1,618	10,695
50	R-50	Non-Participating	652	855	1,321	10,534
51	R-51	Non-Participating	582	890	1,442	10,497
52	R-52	Non-Participating	508	709	1,205	10,384
53	R-53	Non-Participating	452	779	1,359	10,368
54	R-54	Non-Participating	306	516	1,069	10,179
55	R-55	Non-Participating	355	787	1,430	10,211
56	R-56	Non-Participating	99	360	986	9,978
57	R-57	Non-Participating	32	311	615	9,306
58	R-58	Non-Participating	122	314	840	8,999
59	R-59	Non-Participating	186	475	914	8,767
60	R-60	Non-Participating	72	853	1,633	8,779
61	R-61	Non-Participating	68	587	1,377	8,708
62	R-62	Non-Participating	537	1,556	2,329	8,687
63	R-63	Non-Participating	90	322	1,021	8,404
64	R-64	Non-Participating	675	1,676	2,454	8,602
65	R-65	Non-Participating	1,197	2,164	2,950	8,305
67	R-67	Non-Participating	1,428	2,380	3,168	8,191
68	R-68	Non-Participating	1,930	2,942	3,723	8,371
69	R-69	Non-Participating	1,561	2,479	3,269	8,042
70	R-70	Non-Participating	1,468	2,311	3,100	7,898
71	R-71	Non-Participating	1,866	2,819	3,608	8,065
72	R-72	Non-Participating	1,943	2,840	3,630	7,824
73	R-73	Non-Participating	1,878	2,719	3,506	7,680
74	R-74	Non-Participating	1,720	1,878	2,891	6,345
75	R-75	Non-Participating	1,800	2,014	2,985	6,506
76	R-76	Non-Participating	1,582	1,801	2,805	6,334
77	R-77	Non-Participating	1,471	1,692	2,712	6,241
78	R-78	Non-Participating	1,360	1,577	2,574	6,103
79	R-79	Non-Participating	1,291	1,510	2,521	6,051
80	R-80	Non-Participating	1,356	1,577	2,610	6,132

Residential Structures Within 2,000 Feet						
Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
81	R-81	Non-Participating	1,248	1,469	2,494	6,021
83	R-83	Non-Participating	1,168	1,388	2,422	5,943
84	R-84	Non-Participating	924	1,125	2,073	5,594
86	R-86	Non-Participating	193	436	1,394	4,762
87	R-87	Non-Participating	1,069	1,288	2,326	5,839
88	R-88	Non-Participating	840	1,058	2,066	5,595
89	R-89	Non-Participating	759	964	1,933	5,460
90	R-90	Non-Participating	1,252	1,463	2,501	5,989
91	R-91	Non-Participating	792	1,005	1,995	5,524
92	R-92	Non-Participating	751	950	1,902	5,425
93	R-93	Non-Participating	919	1,140	2,168	5,693
94	R-94	Non-Participating	1,491	1,690	2,716	6,166
95	R-95	Non-Participating	678	855	1,786	5,294
96	R-96	Non-Participating	1,399	1,601	2,630	6,090
97	R-97	Non-Participating	1,912	2,098	3,097	6,481
98	R-98	Non-Participating	1,734	1,923	2,930	6,337
99	R-99	Non-Participating	1,554	1,748	2,766	6,200
100	R-100	Non-Participating	304	534	1,429	4,597
101	R-101	Non-Participating	1,216	1,415	2,442	5,902
102	R-102	Non-Participating	358	477	1,421	4,578
103	R-103	Non-Participating	778	996	2,035	5,547
104	R-104	Non-Participating	1,525	1,710	2,713	6,119
105	R-105	Non-Participating	1,605	1,787	2,784	6,178
106	R-106	Non-Participating	1,418	1,607	2,616	6,038
107	R-107	Non-Participating	123	333	1,298	4,473
108	R-108	Non-Participating	1,250	1,443	2,461	5,904
109	R-109	Non-Participating	293	448	1,472	4,920
110	R-110	Non-Participating	1,717	1,897	2,888	6,267
111	R-111	Non-Participating	634	855	1,887	5,409
112	R-112	Non-Participating	1,317	1,509	2,525	5,961
113	R-113	Non-Participating	241	400	1,446	4,676
114	R-114	Non-Participating	266	395	1,437	4,852
115	R-115	Non-Participating	1,174	1,351	2,347	5,759
116	R-116	Non-Participating	1,895	2,051	2,989	6,273
117	R-117	Non-Participating	1,553	1,713	2,663	5,985
118	R-118	Non-Participating	16	305	967	4,140
119	R-119	Non-Participating	124	758	1,563	4,815
120	R-120	Non-Participating	1,205	1,368	2,333	5,704
121	R-121	Non-Participating	1,380	1,539	2,491	5,830

Residential Structures Within 2,000 Feet						
Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
122	R-122	Non-Participating	1,012	1,181	2,157	5,550
123	R-123	Non-Participating	1,226	1,381	2,329	5,667
124	R-124	Non-Participating	1,667	1,808	2,719	5,971
126	R-126	Non-Participating	1,033	1,186	2,139	5,505
127	R-127	Non-Participating	1,534	1,672	2,579	5,842
128	R-128	Non-Participating	1,288	1,422	2,335	5,621
129	R-129	Non-Participating	1,100	1,231	2,149	5,464
130	R-130	Non-Participating	1,133	1,256	2,150	5,429
131	R-131	Non-Participating	1,236	1,351	2,197	5,421
132	R-132	Non-Participating	1,481	1,594	2,425	5,594
133	R-133	Non-Participating	1,571	1,676	2,471	5,566
134	R-134	Non-Participating	1,182	1,283	2,055	5,159
135	R-135	Non-Participating	1,443	1,546	2,309	5,343
136	R-136	Non-Participating	1,562	1,799	2,684	5,555
137	R-137	Non-Participating	1,714	1,898	2,500	5,656
138	R-138	Non-Participating	831	1,164	2,445	2,687
139	R-139	Non-Participating	1,834	1,994	2,478	5,703
140	R-140	Non-Participating	1,881	2,182	2,531	5,813
141	R-141	Non-Participating	1,950	2,293	2,659	5,971
142	R-142	Non-Participating	1,934	2,289	2,668	5,994
143	R-143	Non-Participating	1,894	2,260	2,651	5,980
144	R-144	Non-Participating	1,583	1,956	2,358	5,684
145	R-145	Non-Participating	1,596	1,974	2,384	5,701
147	R-147	Non-Participating	1,925	2,208	2,855	6,013
148	R-148	Non-Participating	1,830	2,056	2,882	5,971
149	R-149	Non-Participating	1,833	2,037	2,983	6,072
150	R-150	Non-Participating	1,779	1,968	2,899	6,050
151	R-151	Non-Participating	1,672	1,768	2,652	5,990
152	R-152	Non-Participating	1,954	2,029	2,878	6,322
153	R-153	Non-Participating	1,968	2,044	2,893	6,360
154	R-154	Non-Participating	1,976	2,046	2,909	6,394
155	R-155	Non-Participating	1,664	1,744	2,615	6,349
156	R-156	Participating Landowner	146	307	897	4,689
157	R-157	Participating Landowner (but parcel not part of Project)	258	371	816	6,187
158	R-158	Non-Participating	1,236	1,442	2,426	7,867
159	R-159	Non-Participating	1,040	1,414	2,285	12,232
160	R-160	Non-Participating	349	1,417	2,165	8,889

Residential Structures Within 2,000 Feet						
Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
162	R-162	Non-Participating	3	541	1,937	12,293
163	R-163	Non-Participating	1,170	1,712	2,611	12,549
164	R-164	Non-Participating	1,738	2,170	2,789	11,300
165	R-165	Non-Participating	1,612	2,450	3,238	7,799
167	R-167	Non-Participating	999	1,196	2,221	5,684
168	R-168	Non-Participating	1,151	1,270	2,141	5,396
169	R-169	Non-Participating	1,582	1,702	2,561	5,747
170	R-170	Non-Participating	1,885	2,045	2,481	5,727
171	R-171	Non-Participating	1,672	1,954	3,651	13,996
174	R-174	Non-Participating	45	355	1,197	11,529
175	R-175	Non-Participating	1,493	1,664	2,460	11,754
176	R-176	Non-Participating	1,429	1,609	2,124	11,344
177	R-177	Non-Participating	1,399	1,620	2,650	6,174
178	R-178	Non-Participating	1,185	1,372	2,383	5,816
180	R-180	Non-Participating	1,958	2,335	2,744	6,062
182	R-182	Non-Participating	452	628	1,591	5,083

Request No. 8:

Provide a detailed table listing all residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:

a. The distance to the boundary line.

b. The distance to the closest solar panel.

c. The distance to the nearest inverter.

d. The distance to the substation.

Response:

a. See the table attached to Response No. 7.

b. See Response No. 8(a) above.

c. See Response No. 8(a) above.

d. See Response No. 8(a) above.

Responding Witness: Matthew Batdorf

Request No. 9:

Provide a detailed table listing all non-residential structures located within 2,000 feet of the Project boundary line. For each structure, provide:

a. A description of any structure (barn, commercial building, warehouse, church, etc.).

b. The distance to the boundary line.

c. The distance to the closest solar panel.

d. The distance to the nearest inverter.

e. The distance to the substation.

Response:

a. See attached.

b. See Response 9(a).

c. See Response 9(a).

d. See Response 9(a).

e. See Response 9(a).

Responding Witness: Matthew Batdorf

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
1		Shed	1,092	1,241	2,554	13,832
2		Garage	1,815	1,933	3,342	14,172
3		Barn	1,711	1,837	3,359	14,058
4		Garage	1,850	2,001	3,229	14,572
5		Garage	1,816	2,262	3,707	13,850
6		Barn	1,668	2,054	3,623	13,876
7		Barn	1,476	1,900	3,405	13,629
8		Barn	1,452	1,869	3,389	13,627
9		Garage	1,234	1,353	2,910	13,586
10		Barn	1,429	1,594	2,891	14,187
11		Shed	1,230	1,357	2,968	13,579
12		Garage	1,640	2,136	3,435	13,491
13		Garage	1,131	1,542	3,086	13,367
14		Shed	1,881	2,415	3,470	13,293
15		Shed	1,517	2,042	3,213	13,205
16		Garage	1,840	2,383	3,278	12,995
17		Barn	1,919	2,428	3,302	12,952
18		Barn	1,331	1,872	2,909	12,867
19		Shed	1,951	2,378	3,249	12,830
20		Garage	1,560	2,097	2,970	12,763
21		Garage	371	715	2,342	12,712
22		Garage	1,975	2,343	3,211	12,742
23	F-1	Government Building	1,487	1,854	2,727	12,470
24		Garage	1,838	2,086	2,950	12,470
25		Commercial Building	1,747	1,954	2,813	12,318
26		Garage	Within Project Boundary	514	1,928	12,291
27		Garage	1,768	1,971	2,824	12,274
28		Shed	1,309	1,534	2,406	12,181
29		Shed	543	1,066	1,980	12,165
30		Garage	1,745	1,931	2,759	12,050
31		Shed	1,727	1,905	2,692	11,936
32	R-32	Shed	649	1,189	2,253	12,417
33		Barn	1,484	1,632	2,277	11,517
34		Shed	1,905	2,305	2,882	11,622
35		Garage	1,859	2,262	2,842	11,573
36		Garage	1,417	1,547	2,119	11,373
37		Shed	22	122	930	11,287

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
38		Barn	1,400	1,539	2,066	11,311
39		Barn	1,419	1,791	2,344	11,263
40		Barn	1,863	2,303	2,936	11,303
41		Garage	1,478	1,902	2,515	11,138
42		Barn	1,621	2,065	2,705	11,054
43		Barn	1,257	1,680	2,294	10,962
44		Shed	1,616	2,065	2,714	10,965
45		Garage	817	1,176	1,742	10,715
46		Garage	578	909	1,476	10,493
47		Garage	460	655	1,155	10,331
48		Barn	225	676	1,337	10,009
49		Shed	158	660	1,318	9,800
50		Barn	Within Project Boundary	274	714	9,172
51		Shed	500	1,554	2,314	8,834
52		Shed	108	658	1,418	8,458
53		Barn	144	308	1,009	8,388
54		Shed	137	392	1,146	8,295
55		Shed	1,213	2,241	3,015	8,597
56		Shed	1,200	2,202	2,983	8,461
57		Garage	1,306	2,276	3,063	8,312
58		Barn	1,262	2,197	2,985	8,227
59		Shed	1,552	2,512	3,300	8,213
60		Garage	1,417	2,257	3,046	7,944
61		Barn	1,961	2,903	3,693	8,013
62		Garage	1,578	2,378	3,163	7,715
63		Shed	1,781	2,567	3,349	7,579
64		Shed	1,838	1,985	3,017	6,426
65		Barn	1,842	1,996	3,017	6,454
66	R-66	Garage	1,861	2,898	3,670	8,567
67		Shed	1,633	1,770	2,810	6,186
68		Garage	1,814	2,029	3,011	6,536
69		Garage	1,480	1,701	2,726	6,253
70		Shed	1,436	1,657	2,688	6,212
71		Shed	1,481	1,701	2,736	6,255
72		Barn	400	635	1,497	4,965
73		Barn	343	578	1,472	4,907
74		Barn	1,182	1,403	2,431	5,956

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
75		Shed	972	1,189	2,193	5,723
76		Shed	1,122	1,343	2,376	5,898
77		Barn	222	424	1,156	4,724
78		Silo	193	404	1,291	4,727
79		Barn	220	416	1,076	4,706
80		Shed	798	974	1,914	5,421
81		Barn	863	1,076	2,067	5,596
82	R-82	Shed	1,384	1,603	2,640	6,156
83		Silo	116	317	1,099	4,617
84		Shed	97	303	1,135	4,609
85	R-85	Barn	1,348	1,564	2,603	6,105
86		Shed	1,543	1,742	2,766	6,213
87		Garage	225	380	1,423	4,668
88		Shed	234	381	1,411	4,851
89		Shed	944	1,146	2,178	5,654
90		Shed	207	356	1,393	4,683
91		Garage	213	349	1,386	4,815
92		Shed	1,686	1,856	2,828	6,176
93		Barn	248	425	1,396	4,879
94		Shed	110	236	1,279	4,697
95		Barn	135	330	1,106	4,280
96		Shed	42	188	1,225	4,530
97		Shed	41	168	1,209	4,570
98		Shed	43	183	1,217	4,547
99		Silo	150	869	1,762	4,927
100		Shed	180	865	1,726	4,855
101		Shed	178	832	1,666	4,798
102		Shed	Within Project Boundary	47	1,092	4,360
103		Shed	1,299	1,448	2,388	5,719
104		Silo	212	960	1,858	4,882
105		Barn	272	902	1,666	4,647
106		Barn	259	930	1,775	4,752
107		Barn	261	907	1,720	4,691
108		Government Building	1,064	1,204	2,139	5,482
109		Garage	1,641	1,773	2,661	5,891
110		Barn	346	1,073	1,949	4,691
111		Barn	468	1,152	1,980	4,619

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
112		Barn	1,321	1,443	2,322	5,576
113		Shed	1,640	1,749	2,557	5,655
114		Barn	1,143	1,248	2,048	5,219
115		Shed	947	1,178	2,076	4,950
116		Garage	1,790	1,971	2,556	5,723
117		Shed	643	1,012	2,337	2,585
118		Shed	1,820	1,993	2,525	5,727
119		Shed	972	1,277	2,554	2,755
120		Garage	1,593	1,969	2,375	5,697
121		Garage	1,567	1,945	2,354	5,672
122		Commercial Building	973	1,371	1,818	5,063
123		Commercial Building	1,362	1,761	2,205	5,452
124		Garage	1,883	2,117	2,838	5,966
125	R-125	Shed	1,942	2,079	2,971	6,177
126		Barn	1,808	2,043	2,766	5,889
127		Garage	1,778	2,011	2,781	5,885
128		Shed	424	674	1,394	4,145
129		Garage	1,787	1,990	2,938	6,023
130		Shed	1,660	1,850	2,783	5,935
131		Shed	1,565	1,744	2,666	5,853
132		Barn	1,267	1,384	2,275	5,578
133		Garage	1,701	1,786	2,662	6,026
134		Silo	23	295	845	4,758
135		Shed	224	427	998	4,831
136		Barn	276	519	1,074	4,931
137		Barn	110	385	949	4,858
138		Barn	89	297	1,056	4,761
139		Shed	186	378	1,115	4,856
140		Barn	275	467	1,117	4,921
141		Shed	269	375	1,028	5,107
142		Barn	213	346	1,033	5,298
143		Shed	714	921	1,906	7,386
144		Barn	730	931	1,921	7,394
145		Silo	1,084	1,295	2,269	7,693
146	R-146	Shed	1,706	2,088	2,504	5,803
147		Barn	1,150	1,350	2,339	7,796
148		Shed	1,086	1,299	2,251	7,630
149		Barn	1,072	1,287	2,247	7,647
150		Shed	1,111	1,318	2,300	7,737

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
151		Barn	1,078	1,282	2,234	7,590
152		Silo	1,189	1,402	2,355	7,732
153		Silo	1,208	1,422	2,379	7,766
154		Shed	756	1,145	2,007	12,074
155		Shed	1,766	1,957	2,793	12,121
156		Shed	1,793	1,977	2,798	12,041
157		Garage	1,511	1,686	2,499	11,810
158		Garage	423	844	1,477	10,287
159		Shed	425	788	1,388	10,338
160		Barn	462	851	1,463	10,359
161	R-161	Shed	1,492	1,974	3,338	13,463
162		Shed	63	344	984	9,943
163		Barn	217	737	1,390	9,792
164		Garage	717	1,757	2,525	8,736
165		Barn	1,730	2,765	3,538	8,569
166		Shed	1,850	2,893	3,663	8,645
167		Commercial Building	977	1,186	2,224	5,715
168		Commercial Building	884	1,093	2,131	5,622
169		Garage	1,223	1,415	2,433	5,876
170		Garage	1,342	1,531	2,543	5,972
171		Shed	1,446	1,629	2,630	6,037
172	R-172	Shed	1,986	2,457	3,822	13,874
173	R-173	Garage	421	946	1,993	12,232
174		Garage	1,655	1,832	2,819	6,193
175		Shed	1,771	1,949	2,937	6,306
176		Garage	1,694	1,872	2,860	6,235
177		Shed	1,552	1,718	2,683	6,029
178		Garage	1,346	1,513	2,483	5,849
179	R-179	Shed	1,627	1,747	2,603	5,788
180		Shed	1,257	1,422	2,394	5,769
181	R-181	Shed	1,884	1,963	2,835	6,569
182		Shed	1,644	1,767	2,636	5,843
183	R-183	Shed	762	1,300	2,304	12,424
184		Barn	1,570	1,675	2,471	5,568
185		Shed	1,426	1,531	2,289	5,321
186		Garage	1,228	1,333	2,136	5,299
187		Barn	1,982	2,230	2,613	5,884
188		Garage	1,969	2,326	2,709	6,036
189		Commercial Building	1,497	1,916	2,379	5,590

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
190		Shed	1,954	2,023	2,887	6,373
191		Garage	1,638	1,718	2,588	6,323
192		Barn	1,195	1,387	2,350	7,699
193		Shed	1,290	1,497	2,479	7,914
194		Shed	649	956	2,374	2,495
195		Shed	1,849	1,966	3,333	14,210
196		Garage	181	399	1,504	12,615
197		Shed	1,796	1,913	3,354	14,150
198		Shed	1,846	2,101	3,820	14,178
199		Barn	1,618	1,913	3,597	13,936
200		Garage	1,653	1,936	3,632	13,976
201		Shed	1,646	1,939	3,625	13,964
202		Shed	1,789	2,138	3,759	14,044
203		Shed	1,781	2,123	3,753	14,044
204		Barn	1,566	1,966	3,514	13,761
205		Barn	1,602	1,997	3,552	13,801
206		Barn	1,632	2,023	3,584	13,836
207		Barn	1,493	1,924	3,416	13,629
208		Shed	1,483	1,887	3,430	13,681
209		Shed	1,519	1,918	3,469	13,721
210		Shed	1,706	2,118	3,640	13,855
211		Shed	1,681	2,098	3,611	13,822
212		Garage	1,814	2,270	3,689	13,811
213		Shed	1,785	2,232	3,676	13,823
214		Shed	1,738	2,207	3,591	13,697
215		Shed	1,978	2,484	3,715	13,657
216		Garage	1,955	2,471	3,650	13,554
217		Garage	1,610	2,120	3,363	13,384
218		Shed	1,491	2,017	3,185	13,180
219		Garage	1,498	2,034	3,109	13,044
220		Shed	1,858	2,394	3,423	13,231
221		Shed	Within Project Boundary	506	1,892	12,255
222		Shed	82	357	1,190	11,516
223		Shed	88	330	1,160	11,492
224		Barn	55	155	976	11,318
225		Shed	132	340	1,181	11,489
226		Shed	43	154	1,017	11,389

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
227		Shed	143	296	1,135	11,452
228		Shed	1,317	1,586	2,459	12,246
229		Shed	1,312	1,606	2,479	12,276
230		Shed	1,895	2,078	2,875	12,089
231		Shed	1,831	2,019	2,850	12,121
232		Shed	1,841	2,030	2,861	12,136
233		Garage	1,739	1,930	2,767	12,111
234		Shed	1,584	1,744	2,445	11,689
235		Shed	1,584	1,741	2,422	11,660
236		Shed	1,548	1,859	2,341	11,454
237		Shed	1,493	1,823	2,329	11,387
238		Garage	1,692	2,065	2,611	11,514
239		Shed	607	939	1,503	10,522
240		Shed	626	954	1,514	10,541
241		Shed	381	572	1,091	10,247
242		Garage	349	556	1,094	10,223
243		Garage	68	331	966	9,944
244		Shed	119	408	777	9,196
245		Shed	134	417	717	9,271
246		Shed	84	243	802	9,099
247		Shed	186	348	908	9,084
248		Barn	27	198	909	8,552
249		Shed	1,745	2,770	3,547	8,514
250		Shed	1,645	2,563	3,353	8,046
251		Silo	194	408	1,291	4,731
252		Shed	1,427	1,647	2,679	6,202
253		Shed	1,446	1,667	2,700	6,222
254		Shed	1,470	1,691	2,720	6,245
255		Garage	1,255	1,474	2,485	6,014
256		Shed	1,410	1,630	2,664	6,185
257		Shed	1,132	1,352	2,387	5,907
258		Shed	1,063	1,282	2,319	5,837
259		Garage	926	1,137	2,114	5,642
260		Shed	933	1,145	2,129	5,657
261		Barn	736	912	1,847	5,355
262		Shed	728	903	1,855	5,356
263		Shed	1,377	1,593	2,633	6,137
264		Shed	1,418	1,624	2,658	6,130
265		Shed	1,242	1,427	2,434	5,859

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
266		Shed	1,603	1,802	2,827	6,273
267		Shed	1,482	1,660	2,651	6,040
268		Shed	1,770	1,960	2,970	6,381
269		Shed	1,763	1,938	2,920	6,280
270		Shed	1,980	2,168	3,170	6,559
271		Garage	1,235	1,381	2,318	5,648
272		Garage	954	1,114	2,085	5,479
273		Shed	968	1,122	2,086	5,470
274		Shed	1,076	1,199	2,100	5,406
275		Shed	1,145	1,259	2,106	5,352
276		Shed	1,528	1,649	2,516	5,735
277		Shed	1,495	1,616	2,483	5,702
278		Garage	1,655	1,798	2,713	5,977
279		Shed	1,189	1,301	2,131	5,354
280		Shed	1,134	1,236	2,010	5,130
281		Shed	1,555	1,663	2,472	5,602
282		Shed	1,569	1,675	2,477	5,592
283		Shed	1,695	1,802	2,602	5,693
284		Shed	1,905	2,043	2,940	6,156
285		Shed	736	955	1,993	5,508
286		Garage	799	1,014	2,054	5,560
287		Garage	656	876	1,913	5,430
288		Garage	615	829	1,869	5,375
289		Garage	1,948	2,317	2,713	6,042
290		Shed	1,556	1,932	2,338	5,660
291		Silo	155	432	1,020	4,938
292		Shed	217	436	999	4,845
293		Shed	223	411	989	4,808
294		Shed	1,139	1,342	2,328	7,779
295		Shed	737	944	1,926	7,408
296		Shed	267	957	1,818	4,795
297		Barn	76	352	931	4,857
298		Commercial Building	299	375	1,277	5,152
299	CH-2	Church	1,971	2,353	2,770	6,066
300	CH-1	Church	1,274	1,520	2,309	5,217
301		Garage	1,235	1,417	2,418	5,835
302		Barn	1,347	1,555	2,591	6,071
303		Barn	1,359	1,644	3,337	13,690
304		Shed	94	586	1,244	9,798

Non-Residential Structures Within 2,000 Feet						
Non-Residential Structure Number	Acoustics ID	Category	Distance to Project Boundary (Feet)	Distance to Panel (Feet)	Distance to Inverter (Feet)	Distance to Substation (Feet)
305		Shed	1,332	1,547	2,587	6,087
306		Garage	1,478	1,605	2,361	5,365
307	M-1	Masonic Lodge	1,261	1,483	2,307	5,263

Request No. 10:

Refer to the Application, Setback Requirements, Item 17, stating that the Applicant plans to file a Motion for Deviation. Provide the Motion for Deviation document.

Response:

The Motion for Deviation from Setback Requirements is being prepared and will be filed promptly.

Responding Witness: Jacqui Kitchen

Request No. 11:

Refer to the Application, Exhibit D, Public Notice, and Exhibit G, Economic Analysis, and the Project website. Explain the statements that the Project has been located on "land intended for industrial uses" (Public Notice) and "1800 acres former, undeveloped industrial site" (website). Reconcile those statements with the Economic Analysis's statement that the site's current use of 1,500 acres as agricultural farmland.

Response:

These statements focus on the land leased from the Purchase Area Regional Industrial Authority (PARIA), which is the industrial authority governed by the Purchase Area Development District (PADD). PARIA assembled and owns roughly 1,865 to 2,100 acres of land north of the City of Mayfield. The land was compiled as a single regional site that PADD leases on behalf of its member counties for long-term economic development. This site was historically earmarked for future manufacturing and logistics uses, and was branded as an industrial park. However, the promised industrial build-out never materialized and the land remained in row-crop farming. PADD/PARIA voted to lease this acreage for the Mayfield Solar which would turn the site into a revenue-generating, tax-producing clean-energy hub reflecting the region's original development goals while still keeping the land in productive, low-impact use for the long term.

Responding Witness: Jacqui Kitchen

Request No. 12:

Explain the difference between the 63 inverter skids stated in the Site Assessment Report and the 55 inverters assumed in the Decommissioning Plan (Exhibit I of the Application).

Response:

The amended Decommissioning Plan filed on March 9, 2026, correctly reflects the 63 inverter skids identified in the Site Assessment Report and site layout filed with the Application.

Responding Witness: Jessica Hodges

Request No. 13:

Confirm whether a battery energy storage energy system (BESS) will be a part of this project. If yes, provide the following:

a. Safety data sheets for the energy storage system.

b. The environmental impact of the batter storage system.

c. Expected life of the batteries.

d. Method to dispose of batteries at the end of the useful life.

e. How the battery storage system installation will comply with National Fire Protection Association Standard 855.

Response:

a. The current Project design incorporates a BESS facility; however, the PV generation project is not dependent on the BESS. If constructed, the BESS will use sealed lithium-ion modules or similar technology with a 15–20 year life, zero emissions in normal operation, and end-of-life recycling or licensed disposal. Safety data sheets will be provided for the chosen model once the vendor is selected, and the chosen system will comply with NFPA 855, UL 9540/9540A, Kentucky Building/Fire Codes, and the NEC.

b. See Response 13(a) above.

c. See Response 13(a) above.

d. See Response 13(a) above.

e. See Response 13(a) above.

Responding Witness: Jacqui Kitchen

Request No. 14:

Provide a physical description of the BESS area, including size of footprint, height of components, number of BESS units and PCS/inverters, fencing plans, and other physical details.

Response:

The BESS area is an approximately 7.5-10 acre fenced yard adjacent to the Project substation in the site interior, with enclosures at 8–10 feet and PCS/transformer equipment at 10–15 feet in height, enclosed by a 6–8 foot security fence with fire-apparatus access. A final unit count will be available once the vendor is selected.

Responding Witness: Jacqui Kitchen

Request No. 15:

Refer to Exhibit H, SAR, Attachment D, Acoustic Assessment. Provide the following:

a. Explain why the Project battery storage area and BESS units are omitted from the report.

b. Provide a revised acoustic assessment that incorporates noise generated by construction of the battery storage area and operation of the BESS units (including power conversion systems/inverters).

Response:

a. BESS was omitted from the Acoustic Assessment because vendor-specific sound power data were not available at the time of the assessment. Supplemental and vendor-specific noise data will be available once procurement is complete. The BESS will be located adjacent to the Project substation, with the nearest non-participating residences being over half a mile away, and a majority of the residences being over 1 mile away.

b. See Response 15(a) above.

Responding Witness: Jacqui Kitchen

Request No. 16:

Provide information on the specifications, model number, dimensions, useful life, and safety measures for the BESS that will be used.

Response:

See Response No. 13 above. Mayfield Solar has not yet executed a final supply agreement for a specific BESS model, so definitive specifications and model numbers are not currently available. However, Mayfield Solar will select a Tier-1, utility-scale, containerized lithium-ion BESS platform, which typically consists of outdoor steel enclosures on concrete pads with approximate dimensions of about 30–32 feet long, 8–10 feet wide, and 8–10 feet tall.

Responding Witness: Jacqui Kitchen

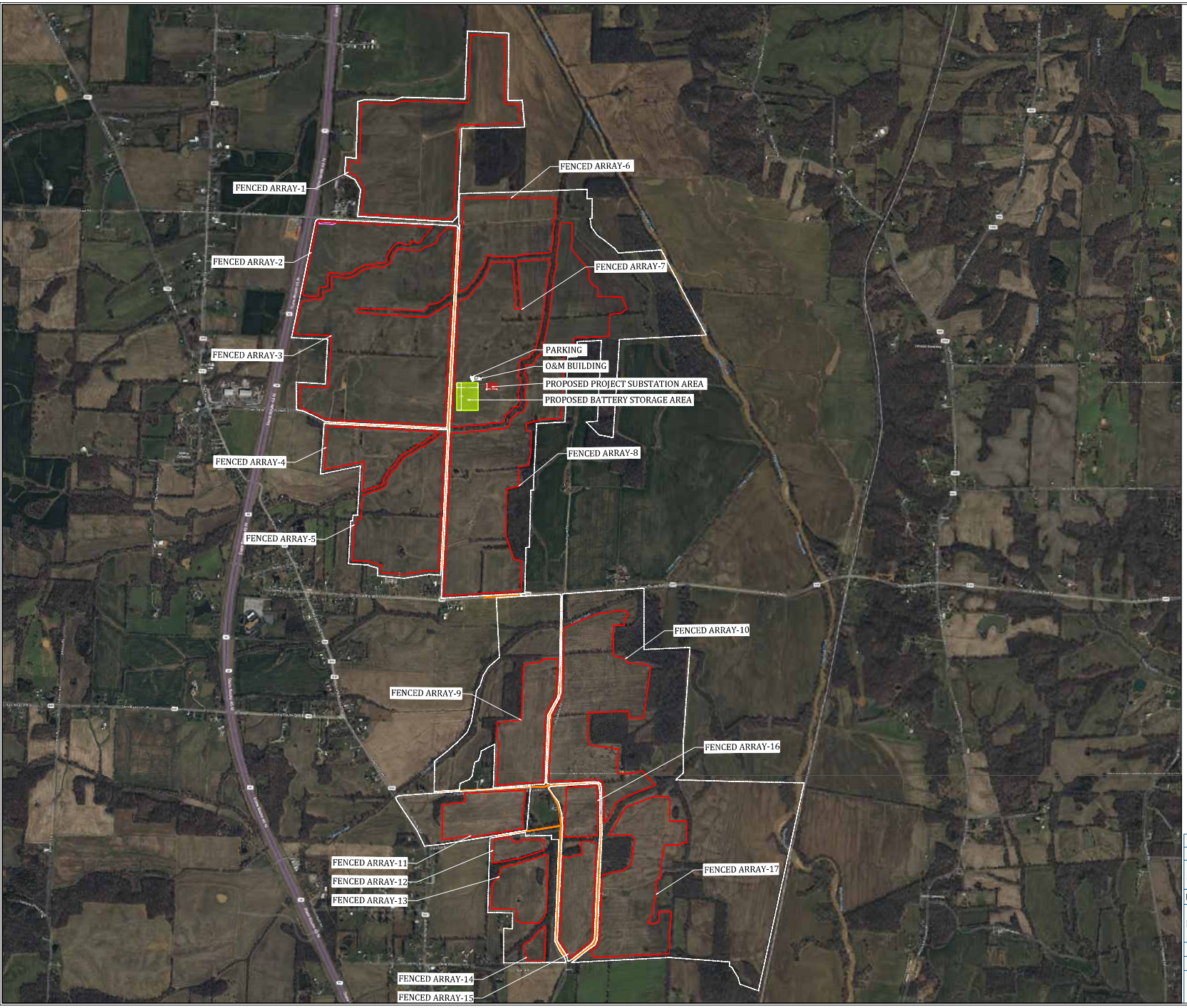
Request No. 17:

Refer to Exhibit H, Site Assessment Report (SAR), Attachment A (Site Plan), Plan Layout. Provide the total number of individually fenced parcels of solar arrays. Provide a version of the Plan Layout map that identifies each of the fenced parcels of arrays with a number.

Response:

See attached.

Responding Witness: Jacqui Kitchen



NOT FOR CONSTRUCTION

N

0' 900' 1800' 3600'

SCALE: 1"=900'

LEGEND:-	
SYMBOL	DESCRIPTION
	SITE BOUNDARY
	SITE FENCED
	COUNTY ROAD

NOTES:

- TOTAL FENCED ARRAY AREAS :17 EACH
- TOTAL LINEAR FOOTAGE OF FENCED LINE SECURING THE SITE ~161,281 LF

DATE	REV.	REVISION HISTORY	DRN. BY	CKD. BY	APPD. BY
2026-03-27	00	FIRST ISSUE	SP	YS	KP

BRIGHTNIGHT	BrightNight Power
PROJECT NAME	MAYFIELD SOLAR
DRAWING TITLE	FENCEDD ARRAY MAP

SCALE	PURPOSE CODE	SHEET SIZE	REV.	SHEET
1" = 900'	ISSUE FOR PERMIT	36" x 24"	00	1 OF 1

Request No. 18:

State whether there will be any weather stations located within the Project site. If so, indicate where those stations will be located narratively and on a revised Plant Layout map.

Response:

Approximately 6-8 weather stations will be placed throughout the Project site, and are typically located adjacent to PV arrays to measure weather conditions in the surrounding area. Weather stations are typically 10-15 feet in height. Locations of weather stations will be finalized prior to commencing construction.

Responding Witness: Jacqui Kitchen

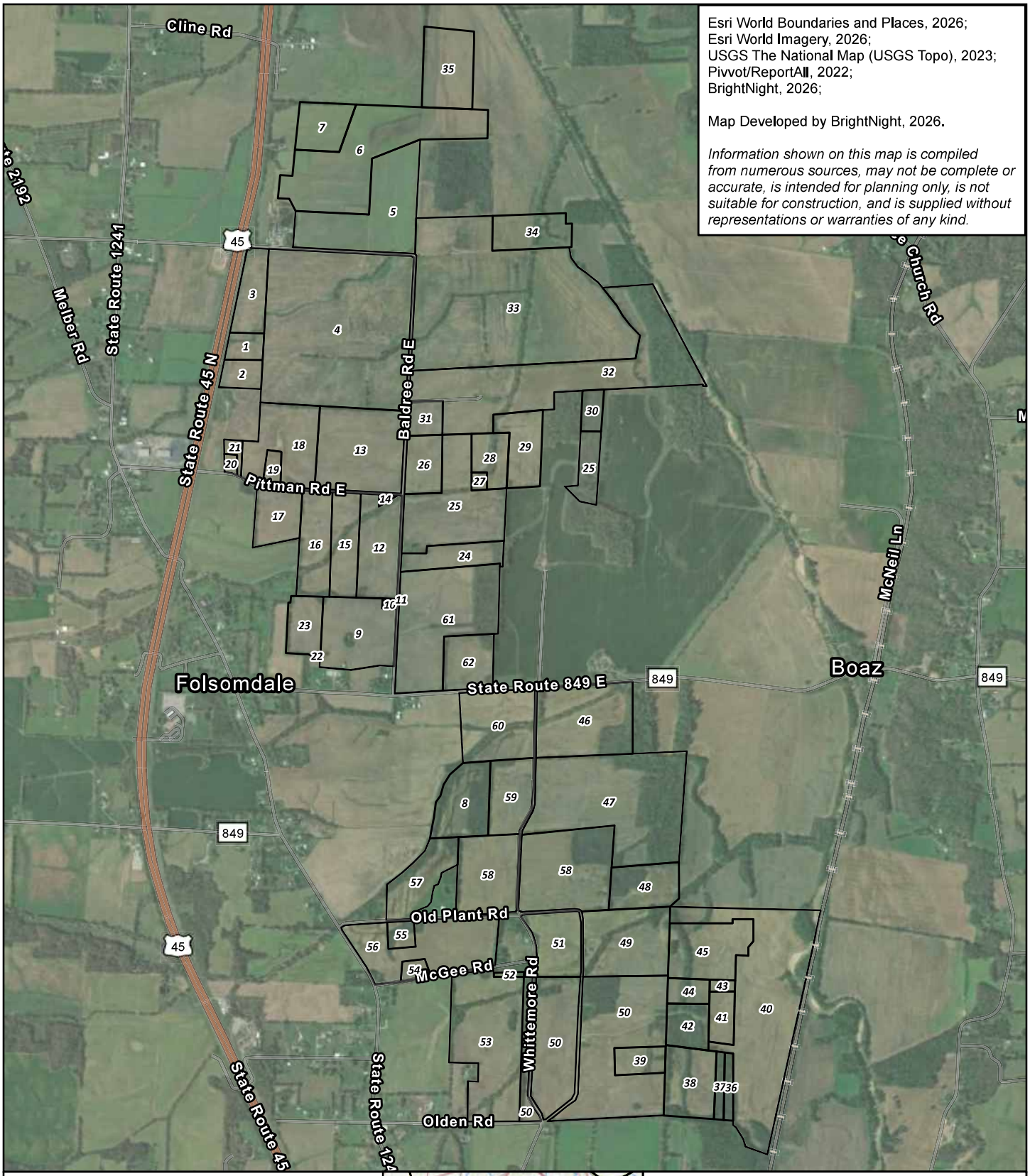
Request No. 19:

Refer to Exhibit H, SAR, Attachment C, Legal Boundaries. Provide a version of the Legal Description Inventory Overview. Include an aerial map with the parcels labeled from 1 to 62, according to the parcel descriptions in the attachment (i.e., "Parcel 1").

Response:

See attached.

Responding Witness: Jacqui Kitchen


Esri World Boundaries and Places, 2026;
Esri World Imagery, 2026;
USGS The National Map (USGS Topo), 2023;
Pivvot/ReportAll, 2022;
BrightNight, 2026;
Map Developed by BrightNight, 2026.
Information shown on this map is compiled from numerous sources, may not be complete or accurate, is intended for planning only, is not suitable for construction, and is supplied without representations or warranties of any kind.
Cline Rd
Melber Rd
State Route 1241
State Route 45 N
Baldree Rd E
Pittman Rd E
Church Rd
McNeil Ln
Folsomdale
Boaz
State Route 849 E
849
Old Plant Rd
McGee Rd
Whittemore Rd
Olden Rd
State Route 45
State Route 124
45
Parcel Boundary
1 inch = 2,500 feet
0 625 1,250 2,500 3,750 Feet
McCracken
Graves
GRAVES COUNTY
Legal Description Inventory
Overview - Aerial
MAYFIELD SOLAR
Graves Co., KY
Project: MYSO
Date: 3/26/2026
BRIGHTNIGHT
Figure: N/A
TAH Z:\Shared\GIS\Dev\Projects\America_North\US\MYSO\Pro\Mapbook-MYSO-KYSB-LegalDescriptionInventory-Overview-Aerial-v06-8x11-P.aprx

Request No. 20:

Refer to Exhibit H, SAR, Attachment A, Site Plan Layout.

a. Provide the total number of site access entrances in use during the construction phase.

b. Provide a narrative description of each construction entrance location.

c. Provide a revised Plant Layout map if these locations have changed.

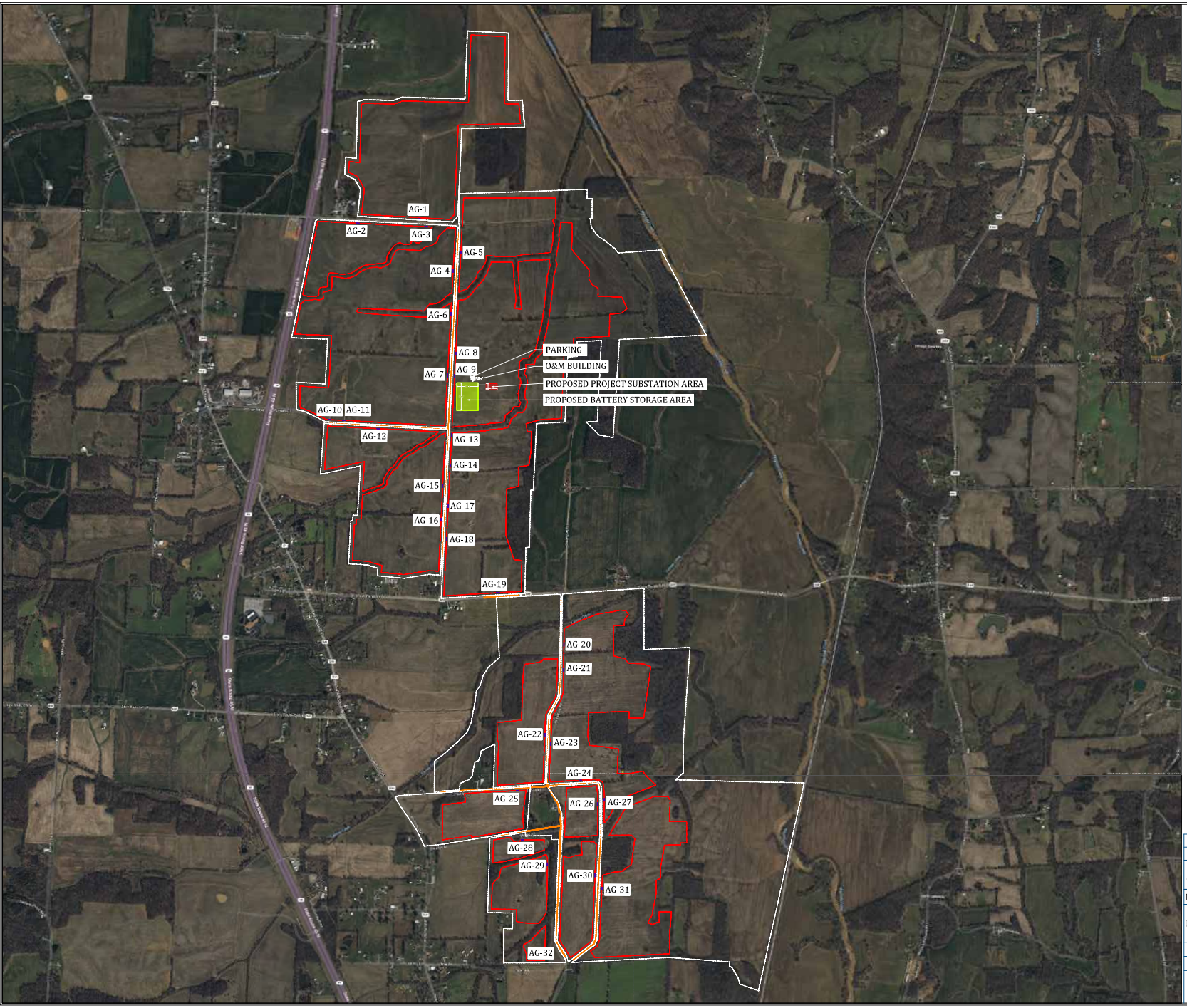
Response:

a. See Response No. 5(a) above.

b. See Response No. 5(a) above.

c. See attached.

Responding Witness: Jacqui Kitchen



NOT FOR CONSTRUCTION

N

0' 900' 1800' 3600'

SCALE: 1"=900'

LEGEND:-	
SYMBOL	DESCRIPTION
	SITE BOUNDARY
	SITE FENCE
	COUNTY ROAD
	ACCESS GATE (AG - X)

NOTES:

- TOTAL ACCESS GATES : 32 EACH

DATE	REV.	REVISION HISTORY	DRN. BY	CKD. BY	APPD. BY
2026-03-27	00	FIRST ISSUE	SP	YS	KP

BRIGHTNIGHT	**BrightNight Power**
PROJECT NAME	MAYFIELD SOLAR
DRAWING TITLE	ENTRANCE MAP

SCALE	PURPOSE CODE	SHEET SIZE	REV.	SHEET
1" = 900'	ISSUE FOR PERMIT	36" x 24"	00	1 OF 1

Request No. 21:

Refer to Exhibit H, SAR, Attachment A, Site Plan Layout.

a. Provide the total number of site access entrances in use during the operations phase.

b. Provide a narrative description of each operation's entrance location.

c. Provide a revised Plan Layout map if these locations have changed.

Response:

a. See Response No. 5(b) above.

b. See Response No. 5(a) above.

c. See Response No. 20(c) above.

Responding Witness: Jacqui Kitchen

Request No. 22:

Explain whether each entrance available during the construction period and during the operational period will have its own security gate.

Response:

Each entrance will have a locked security gate.

Responding Witness: Jacqui Kitchen

Request No. 23:

Explain whether and how MYSO will coordinate with local law enforcement regarding security and emergency protocols during construction and operations.

Response:

The Project's Engineering, Procurement, and Construction (EPC) contractor will coordinate with local law enforcement and emergency responders prior to start of construction to develop a Project-specific Emergency Response Plan based on the final site layout and components selected for the site.

Responding Witness: Jacqui Kitchen

Request No. 24:

Provide a detailed description of construction activities, including a construction timeline and schedule by activity, accounting for construction of all Project components. Explain any potential for deviation to that schedule.

Response:

The Project is anticipated to commence construction in 2027 and last approximately 18 to 24 months. Construction activities will occur sequentially and concurrently across the Project site. Construction will occur sequentially in a given area to complete any clearing and grading activities before commencing installation of Project components. Construction activities will occur concurrently in that multiple areas of the site will commence installation activities simultaneously. The particular construction activity or set of activities needed on a given portion of the Project depends on the area's existing natural features and the extent of work required to prepare the land for installation of Project components. Deviations from the schedule may occur due to weather conditions and supply chain disruptions but are not anticipated to substantially impede Project construction.

Responding Witness: Jacqui Kitchen

Request No. 25:

State when the peak construction phases will occur (which month(s) of the full construction period), accounting for construction of all Project components.

Response:

Applicant anticipates that peak construction activities will begin at approximately the fourth month of construction and last approximately seven to nine months thereafter.

Responding Witness: Jacqui Kitchen

Request No. 26:

Provide the average number of construction workers on-site each day over the course of the construction period, accounting for construction of all Project components.

Response:

Over its entire construction duration, the Project is anticipated to experience an average construction workforce of 100 to 125 workers or approximately 40% to 50% of its peak construction workforce.

Responding Witness: Jacqui Kitchen

Request No. 27:

Refer to Exhibit H, SAR, Attachment B, Property Value Impact Report, Adjoining Use Breakdown table. Describe the industrial uses adjoining the Project site.

Response:

According to publicly available information, the lone industrial use adjoining the Project site is Alcrete (https://alcrete.com/), a precast concrete manufacturer.

Responding Witness: Jacqui Kitchen

Request No. 28:

Explain the purpose of the Purchase Area Regional Industrial Authority.

a. State whether the Project site is a subset of the properties owned by the Authority.

b. Explain whether, in the absence of the Project, the Authority would take the acreage within the Project site out of agricultural production for some other commercial or industrial development.

Response:

a. The Purchase Area Regional Industrial Authority is a multi-county economic development entity formed to assemble, hold, and market large sites—like the Mayfield site—for future industrial and commercial projects that create jobs and tax base in the region. The Mayfield Solar project site is a subset of the acreage owned by PARIA at this industrial park.

b. In the absence of the Project, based on PARIA's stated goals, the area would still be slated for industrial or commercial uses.

Responding Witness: Jacqui Kitchen

Request No. 29:

Provide details of any communications to date with the Graves County Road Department.

Response:

Project representatives met with the Graves County Road Department (GCRD) in June 2024 to provide information regarding the Project, including site location, potential local road use, connectivity to Kentucky State Routes, and general construction timelines. Project representatives will continue to meet with GCRD prior to commencement of construction.

Responding Witness: Jacqui Kitchen

Request No. 30:

Provide the method and route for delivery of the Project Transformer.

Response:

Viable haul routes for the Project Transformer have been identified and verified for Project delivery, beginning at US Highway 45, then heading east on E. Pittman Road, then heading north on E. Baldree Road, to finally enter the Project Substation area east of E. Baldree Road.

Responding Witness: Jacqui Kitchen

Request No. 31:

Refer to Exhibit H, SAR, Attachment F, Traffic Assessment. Explain how the bridge closure on Whittemore Road (over Carney Creek) may impact Project traffic and deliveries.

Response:

A bridge closure on Whittemore Road is not expected to impact Project traffic or deliveries because closure will not prevent site access due to presence of multiple routes available to Project access points.

Responding Witness: Jacqui Kitchen

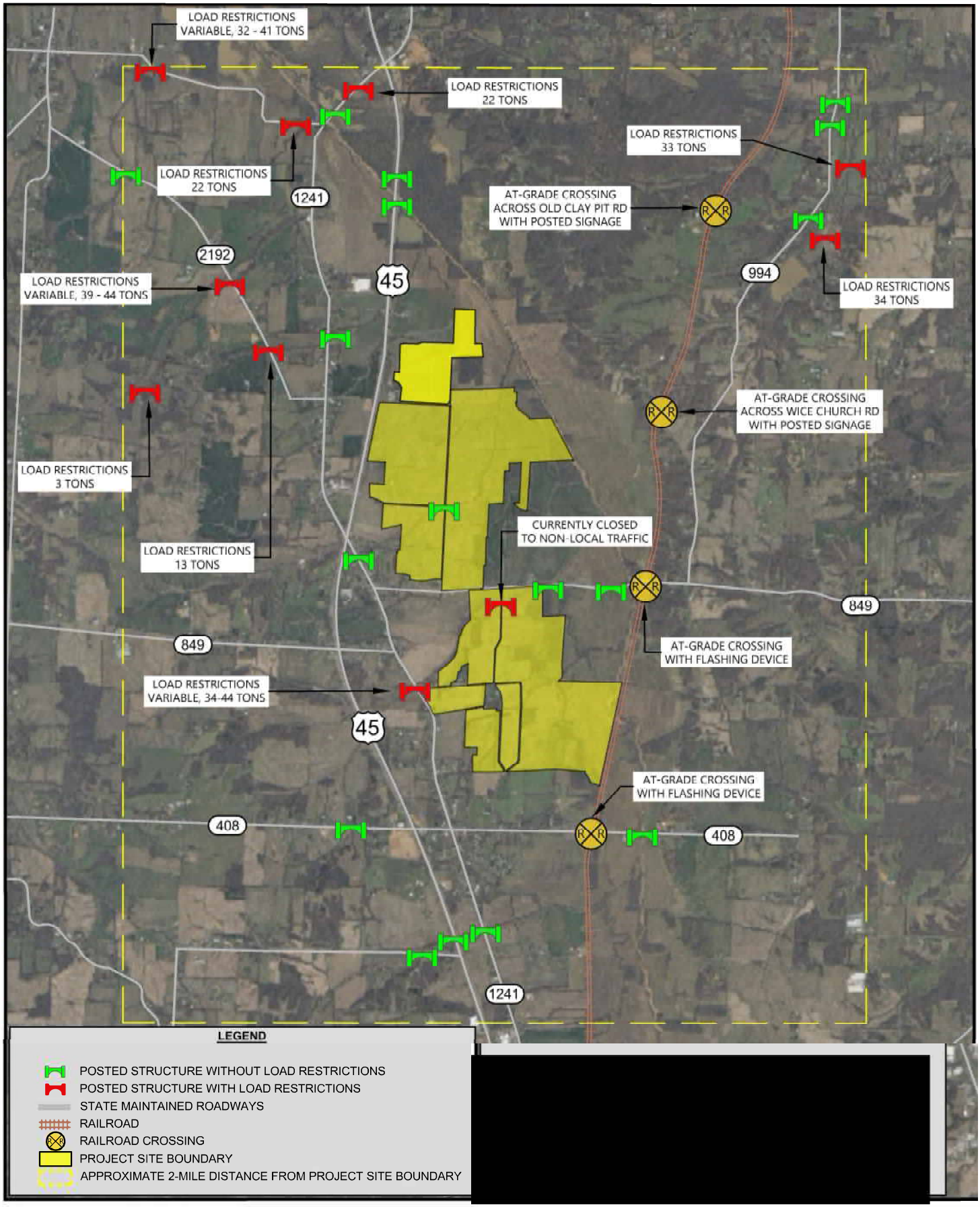
Request No. 32:

Provide a map of all railroad crossings within two miles of the Project area including details for each crossing (type of crossing, weight limit, warning/control devices, etc.).

Response:

See attached.

Responding Witness: Jacqui Kitchen



TETRA TECH

N

Mayfield Solar
Graves County, KY

REQUEST 32 & 34

Request No. 33:

Provide any communications the Project has had with the P&L Railway regarding the Project, including discussions of rail schedules, road crossings, safety measures, etc.

Response:

Applicant has had preliminary verbal discussions with P&L Railroad regarding the Project, and will continue to meet with railroad representatives to coordinate construction activities with applicable rail schedules and safety measures.

Responding Witness: Jacqui Kitchen

Request No. 34:

Refer to Exhibit H, SAR, Attachment F, Traffic Assessment. Provide the location and weight limit ratings for all bridges within two miles of the Project area. Indicate which bridges will or may be used by Project construction traffic and deliveries.

Response:

Please see the map attached to Response No. 32. The Project will comply with all roadway permits and posted weight limits on bridges along delivery routes.

Responding Witness: Matthew Batdorf

Request No. 35:

Provide the average daily number of construction vehicles accessing the site by vehicle type, i.e., worker vehicles, delivery trucks, cement trucks, water trucks, etc.

Response:

The Project's anticipated daily number of vehicles is as follows: 110 construction worker vehicles per day; 10 mid-size delivery trucks per day; and 10 semi-tractor trailer size delivery trucks per day.

Responding Witness: Matthew Batdorf

Request No. 36:

Provide the peak daily number of construction vehicles accessing the site, by vehicle type, i.e., worker vehicles, delivery trucks, cement trucks, water trucks, etc.

Response:

During peak construction, the Project's anticipated daily number of vehicles is as follows: 238 construction worker vehicles per day; 10 mid-size delivery trucks per day; and 10 semi-tractor trailer size delivery trucks per day.

Responding Witness: Matthew Batdorf

Request No. 37:

Provide the maximum expected weights for each type of delivery truck, including cement and water trucks.

Response:

Maximum expected load weights for delivery trucks will vary depending on the type of material or equipment being transported. All deliveries will comply with state and local roadway regulations and coordinate with state and local roadway authorities as appropriate, including obtaining any necessary permits. At this time, anticipated truck types and weight loads are as follows:

- Cement and water trucks with anticipated weight limits up to 80,000 lbs. (fully loaded);
- Weight limits for heavy equipment transport vary based on the specific equipment being transported, but the Project will coordinate with Kentucky Transportation Cabinet (KYTC) District 1 for appropriate permitting if loads exceed 80,000 lbs.;
- Gravel for access roads will be delivered via standard dump trucks with anticipated weight limits up to 80,000 lbs.; and,
- Solar panels and inverters will be delivered via standard flatbed or semi-truck with anticipated weight limits up to 80,000 lbs.
- At this time, the anticipated transformer weight is approximately 300,000 lbs. Per best practices and following KYTC heavy haul requirements, Mayfield Solar plans to deliver the transformer using an engineered trailer solution that minimizes per axle weight to less than 40,000 lbs. Class 8 truck is anticipated to be used for delivery.

Responding Witness: Matthew Batdorf

Request No. 38:

Provide the maximum expected load weights for each type of delivery, including cement and water, heavy equipment, gravel for access roads, panels, inverters, BESS units, and the transformer.

Response:

See Response No. 37 above.

Responding Witness: Matthew Batdorf

Request No. 39:

Explain whether any oversize or overweight deliveries will require special permits.

Response:

Mayfield Solar anticipates the Project's substation to require on Overweight/Over-dimensional permit from KYTC.

Responding Witness: Jacqui Kitchen

Request No. 40:

Explain whether any improvements to bridges or roadways in the Project area will be necessary prior to construction.

Response:

A majority of the Project delivery routes will use state roads. It is anticipated that upgrades may be necessary for the un-maintained roadway east of Whittemore Road and south of Old Plant Road. No upgrades to bridges have been identified at this time; however, upon selection of an EPC, the Project route will be evaluated by a structural engineer to determine if any improvements are necessary.

Responding Witness: Matthew Batdorf

Request No. 41:

Refer to Exhibit H, SAR, Attachment F, Traffic Assessment. Provide the plan for repairing Project-related damage to any roadways, railway crossings, or bridges.

Response:

Project representatives will communicate with local and state officials regarding road conditions throughout the construction phase to identify and repair any road damage specifically caused by the Project.

Responding Witness: Matthew Batdorf

Request No. 42:

Explain any specific traffic management strategies to be employed during construction.

Response:

For its specific traffic management strategy, the Project will identify Transportation Demand Management (TDM) strategies prior to construction to utilize during this phase of the Project. The TDM program is anticipated to include the following elements to the extent feasible:

- Prioritizing use of designated truck routes for deliveries;
- Placing temporary traffic control signage at key locations leading to the site;
- Staggering worker start times or multiple shifts;
- Utilizing metered delivery arrival times;
- Scheduling worker start times that are outside of the peak commuting hours of the adjacent street traffic;
- Designating construction staff to serve as flaggers to direct traffic into and/or through temporary traffic control zones as needed; and
- Ensuring emergency vehicle access to the site at all times.

Responding Witness: Matthew Batdorf

Request No. 43:

Explain whether any traffic stoppages will be necessary to accommodate large truck deliveries. If yes, provide the expected location(s), frequency and length of those stoppages.

Response:

Traffic stoppages may be necessary to accommodate large or oversized truck deliveries. Mayfield Solar will coordinate with local and state officials to ensure that ensure that traffic stoppages resulting from the Project will be minimized and appropriately permitted where necessary.

Responding Witness: Matthew Batdorf

Request No. 44:

Explain whether access to Nall Cemetery will be restricted in any way during construction.

Response:

Access to Nall Cemetery will not be restricted during construction.

Responding Witness: Jacqui Kitchen

Request No. 45:

If applicable, describe odor impacts from diesel fumes or other sources from construction vehicles that may be noticeable to nearby residents.

Response:

Odor impacts associated with construction activities, if any, are expected to be minimal and temporary. Any odors will dissipate quickly due to outdoor air circulation. Construction activities will comply with applicable fugitive emissions standards, and equipment will be maintained in good working condition to minimize exhaust-related odors.

Responding Witness: Jacqui Kitchen

Request No. 46:

Indicate whether the Project site will be irrigated to promote vegetation growth and reduce potential erosion.

Response:

The Project does not intend to employ supplemental irrigation.

Responding Witness: Jacqui Kitchen

Request No. 47:

Refer to Exhibit H, SAR, Attachment D, Acoustic Assessment and Exhibit H, SAR, Attachment C, Legal Boundaries. State whether any of the residential structures located within 2,000 feet of the Project boundary are owned by participating landowners. If so, identify those homes owned by participating landowners on the contour maps and acoustic modeling tables.

Response:

See tables provided in Response Nos. 7 and 8 above. One participating landowner owns two residential structures within 2,000 feet of the Project boundary, located north of E. Baldree Road. These structures are labeled as R-156 and R-157 in the Project's Acoustic Assessment.

Responding Witness: Matthew Batdorf

Request No. 48:

Refer to Exhibit H, SAR, Attachment D, Acoustic Assessment. Provide noise contour maps similar to Figure 1 for the modeled peak construction sound levels A, Lmax) as provided under "Site Preparation, Grading, and Excavation (With Piledriving)" in Table A-1.

Response:

The analysis provides estimates of construction noise, as identified in Table A-1 of the Acoustic Assessment; however, because models are static, they cannot account for factors such as the location and use of all machinery at a given time, humidity, wind, and other factors that influence how sound travels. In addition to the many variables that could affect noise at any single receptor during construction, noise impacts would be temporary and variable as construction equipment and vehicles move through the Project Area. As a result of these limitations, a "maximum" construction sound level cannot be reliably produced, and a noise contour map would not accurately display true construction sound levels at receptors.

Responding Witness: Matthew Batdorf

Request No. 49:

Provide the existing daytime ambient sound level(s) for the Project site.

Response:

Existing ambient noise levels in the area can be estimated by evaluating the land uses in the area. General ambient noise levels by land use have been estimated in American National Standards Institute (ANSI) standard 12.9-2013/Part 3. According to this standard, daytime ambient sound levels for the Project site may range from 50 – 55 dBA.

Responding Witness: Jessica Hodges

Request No. 50:

Explain whether a plan to coordinate construction activities around the schedules of local churches has been or will be developed. Provide that plan, if developed.

Response:

Project representatives have not engaged with churches at this point, but plan to reach out to nearby local churches prior to construction. The planned construction schedule is for Monday through Saturday, so will not interfere with any Sunday church activities.

Responding Witness: Jacqui Kitchen

Request No. 51:

Refer to the Application, Description of Proposed Site, Item 12, specifically stating that "the site is likely visible from some existing surrounding residences". Provide a Visual Impact Analysis, detailing the visibility of Project infrastructure from various locations around the Project site, including roadways, residences and the cemetery.

Response:

A formal Visual Impact Analysis has not been prepared for the Project at this time. The screening plan provided in Response No. 52 below shows how screening will minimize and, where feasible, eliminate views of Project infrastructure from adjacent roadways, nearby residences, and the cemetery.

Responding Witness: Matthew Batdorf

Request No. 52:

Refer to the Application, Description of Proposed Site, Item 12, specifically stating that the Project plans to install vegetative screening in key locations. Provide a detailed landscaping and screening plan. Include the following:

a. Identifying the location of proposed screening,

b. The basis for screening locations,

c. The length of different segments of screening,

d. The types of vegetation to be installed,

e. Their height at maturity, length of time to maturity,

f. Plans for on-going maintenance, and

g. Other details related to the proposed screening.

Response:

Please see attached.

Responding Witness: Bob Roy

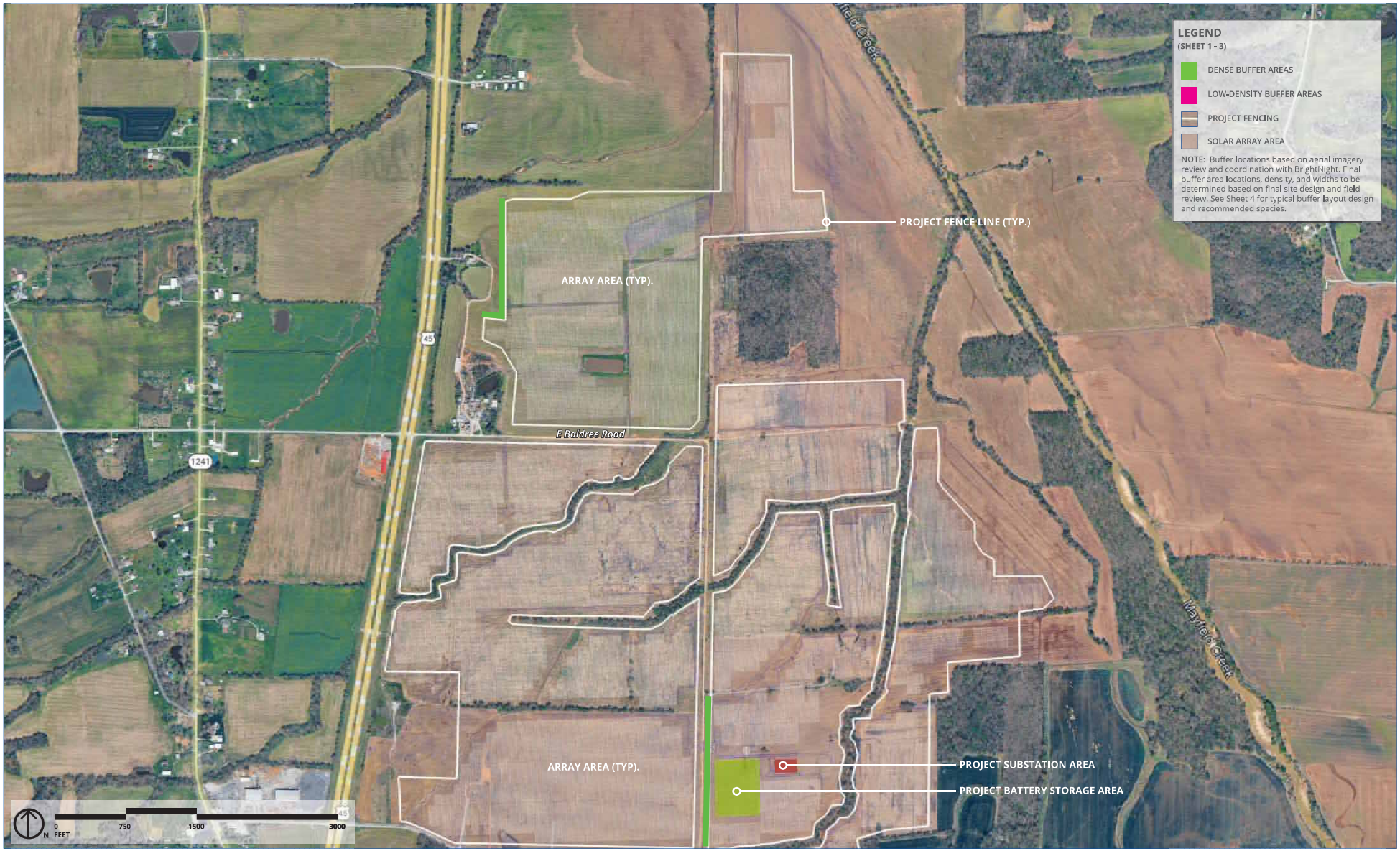
MAYFIELD SOLAR PROJECT

GRAVES COUNTY, KY

CONCEPTUAL LANDSCAPE BUFFER PLAN

NOT FOR CONSTRUCTION

LANDSCAPE BUFFER LOCATIONS



TETRA TECH BRIGHTNIGHT

March 2026 SHEET 1 of 4

Conceptual Landscape Buffer Plan

MAYFIELD SOLAR PROJECT

GRAVES COUNTY, KY

CONCEPTUAL LANDSCAPE BUFFER PLAN

NOT FOR CONSTRUCTION

LANDSCAPE BUFFER LOCATIONS

MAYFIELD SOLAR PROJECT

GRAVES COUNTY, KY

CONCEPTUAL LANDSCAPE BUFFER PLAN

NOT FOR CONSTRUCTION

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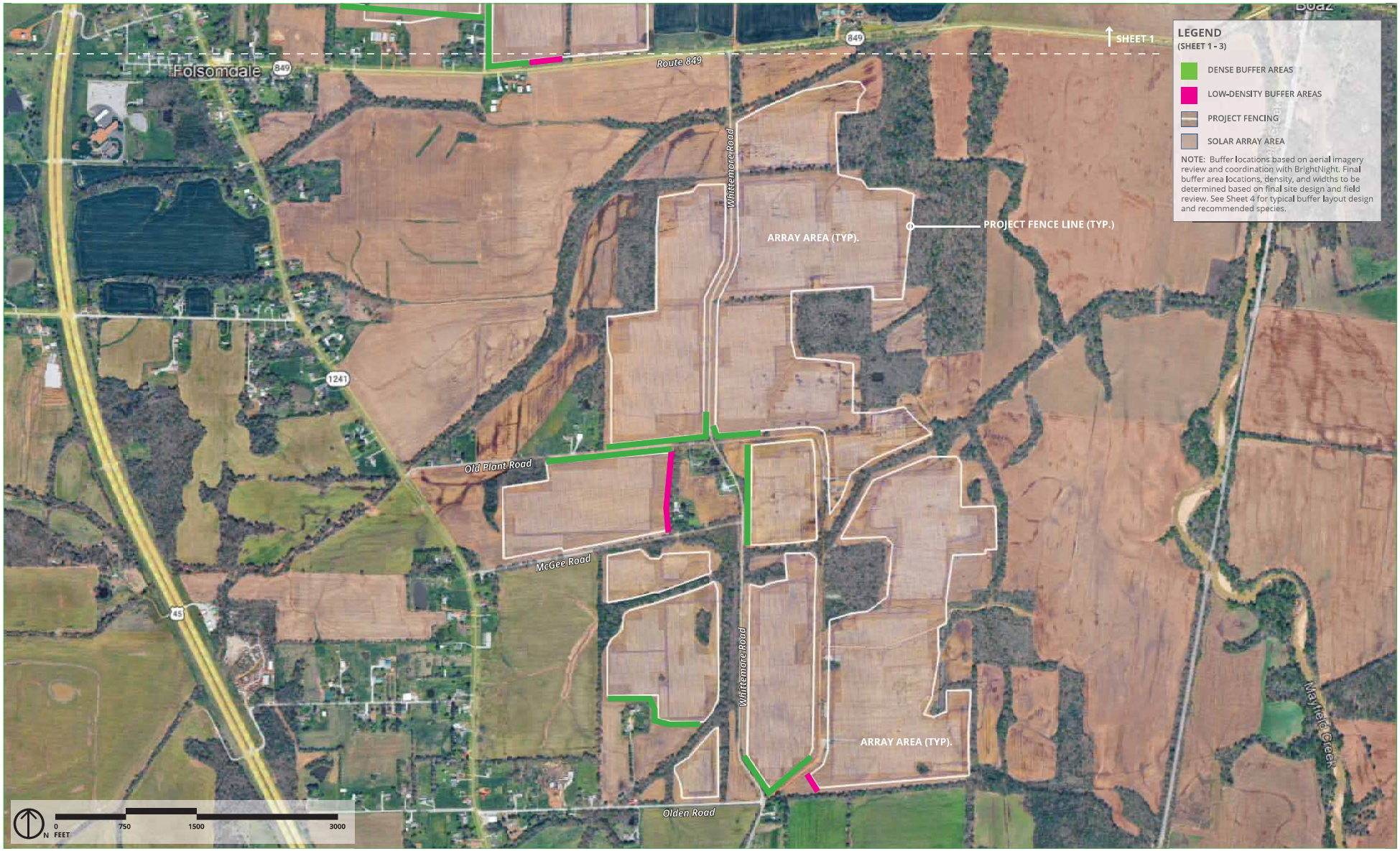
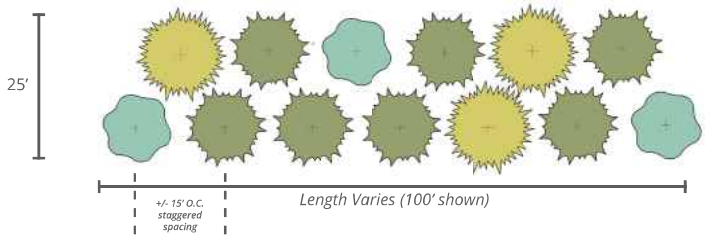
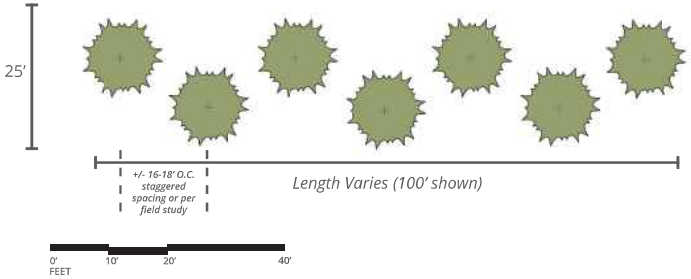


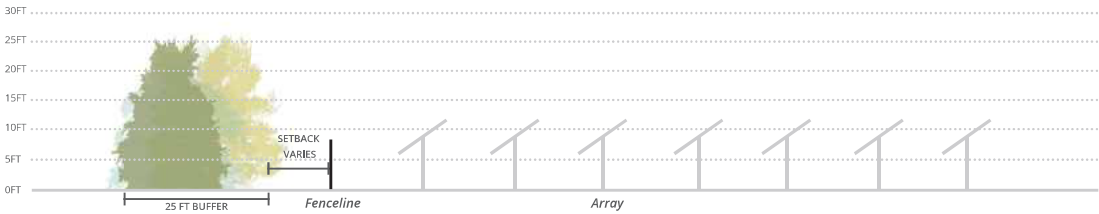
TYPICAL LAYOUT 1: ***DENSE***



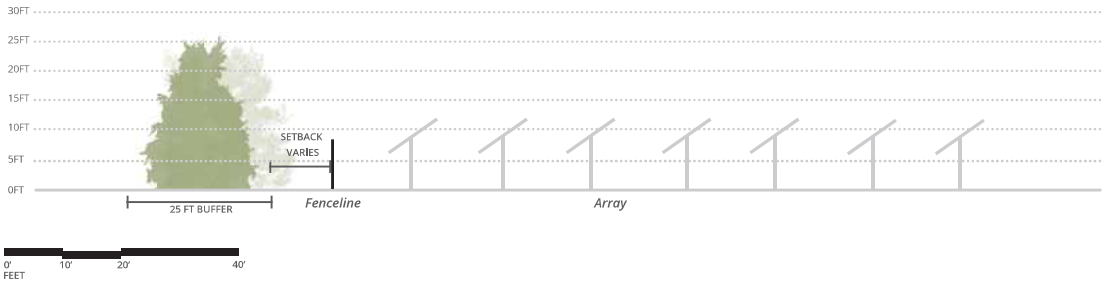
TYPICAL LAYOUT 2: ***LOW-DENSITY/COMPLEMENTARY***



TYPICAL CROSS SECTION - ***DENSE***



TYPICAL CROSS SECTION - ***LOW-DENSITY/COMPLEMENTARY***



RECOMMENDED SPECIES LIST

Key	Scientific Name	Common Name	Foliage	Typical Height	Typical Spread	Spacing	Install Height	Typical Growth Rate	Quantity Per 100 Linear Feet
NATIVE AND NATURALIZED EVERGREEN TREES									
	Pinus virginiana	Virginia Pine	Evergreen	20-40 Feet	20-25 Feet	15-18 Feet (See Typical Layouts)	3-5 Feet	1-2 Feet/Year	Dense - 3 Low Dense - N/A
	Juniperus virginiana	Eastern Red Cedar		25-35 Feet	10-20 Feet		4-6 Feet	1.5 Feet/Year	7 Per Layout (Mix Species)
	Thuja plicata x standishii 'Green Giant'	Green Giant Arborvitae		40-50 Feet	10-20 Feet			2-3 Feet/Year	
	Ilex opaca	American Holly		20-40 Feet	15-25 Feet		3-5 Feet	1 Foot/Year	Dense - 3 Low Dense - N/A
GROUNDCOVER SEED MIXES									
ROUNDSTONE SEED: Mix SS-D1 • *Southern Pollinator Conservation Mix*									
ROUNDSTONE SEED: KY Pollinator Mix 4									

PLAN NOTES AND INTENT

Intent:

This conceptual landscape buffer plan has been prepared as a guide for visual mitigation of the Mayfield Solar Project. Layout 1 provides a typical layout for a dense buffer applicable to Project view corridors where no existing intervening vegetation is present. Layout 2 provides a typical layout for a low-density, complementary buffer to enhance areas where some existing vegetation exists that may only partially screen the Project.. Both layouts include evergreen species native or naturalized to Kentucky and have been selected to provide a more natural, varied appearance.

Notes:
This plan is meant to guide Project-wide visual mitigation decisions for buffer areas identified in coordination with BrightNight, and is not meant to address views from one single viewpoint. Final planting locations, quantities, and buffer area widths are subject to final site plan layout, field verification and all applicable local, county, and state guidelines and requirements.

To provide for maximum variation and chance of success, planted areas should use a mix of species listed. However, the variety of recommended species in the list provides for a suitable number of options/alternatives in cases where certain species may be regionally in short supply.

Planting at sizes greater than those listed is not recommended in order to prevent shock, increase growth, and increase chances of successful establishment.

Plant species shown in the typical layouts and elevations are shown at 50 to 75 percent of anticipated height and spread.

All new planting to adhere to appropriate setback distances from roads and overhead and underground utilities.

RECOMMENDED SPECIES IMAGERY


Eastern Red Cedar


American Holly


Green Giant Arborvitae


Virginia Pine

TYPICAL AGRICULTURAL STYLE PROPOSED PROJECT FENCING

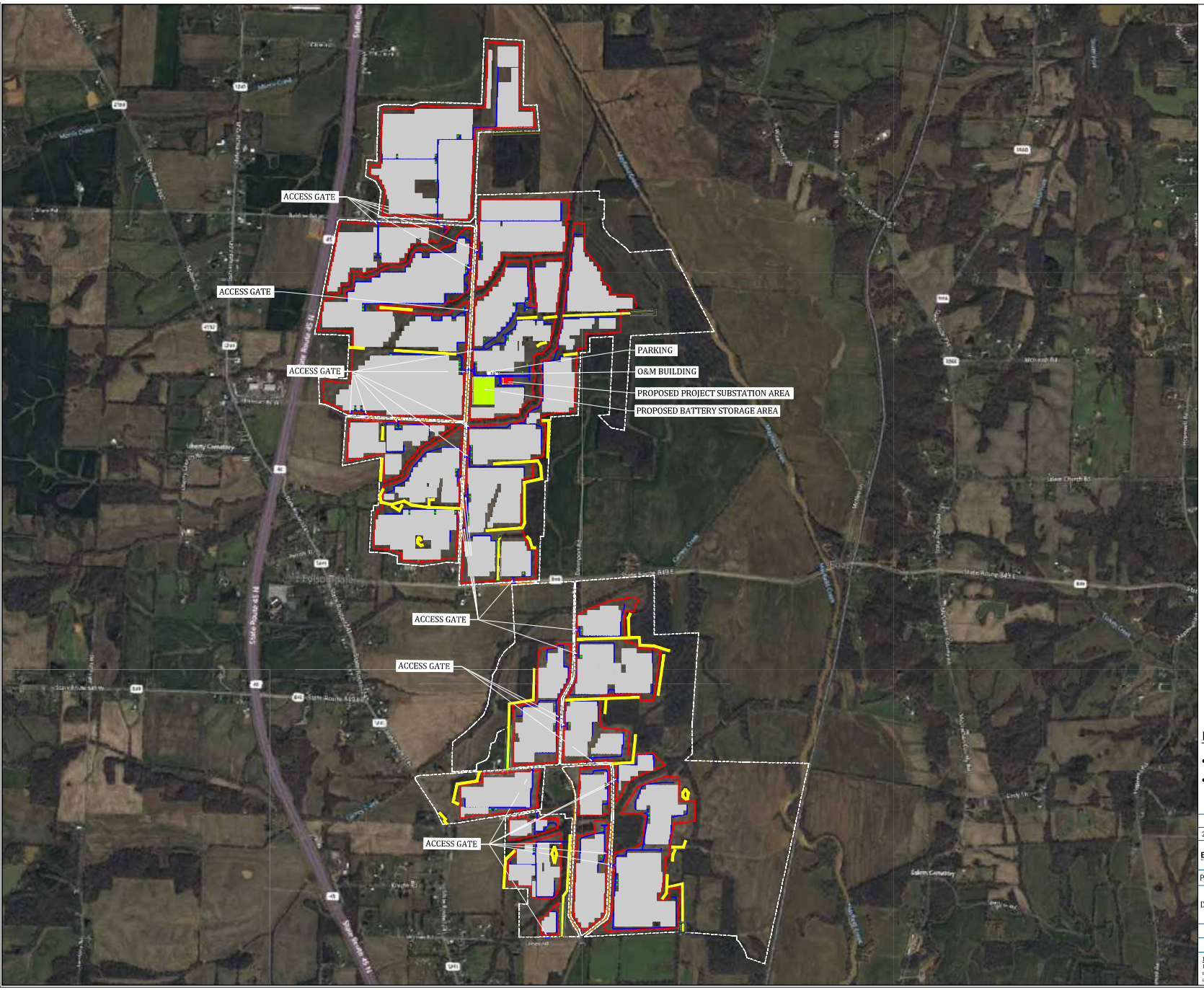
Request No. 53:

Refer to Exhibit H, SAR, Attachment A, Site Plan, listing a "tree trimming area" of about 81 acres. Explain the planned tree trimming activity and identify the areas of tree trimming on a map of the site.

Response:

The planned tree trimming activity is for areas where tree shading may require trimming, topping, or removal of trees. Please see attached.

Responding Witness: Bob Roy



NOT FOR CONSTRUCTION

N

W E

S

0' 2000' 4000' 8000'

SCALE: 1"=2000'

LEGEND:-	
SYMBOL	DESCRIPTION
	SITE BOUNDARY
	SITE FENCE
	SETBACK LINE FROM FENCE
	TREE TRIMMING AREA
	COUNTY ROAD

NOTES:

- TOTAL TREE TRIMMING CONSIDERED ~81 ACRES
- THERE IS NO TREE REMOVAL WITHIN ANY JURISDICTIONAL FEATURES (STREAMS/WETLANDS ETC)

DATE	REV.	REVISION HISTORY	DRN. BY	CKD. BY	APPD. BY
2026-03-27	00	FIRST ISSUE	SP	YS	KP

BRIGHTNIGHT	BrightNight Power
PROJECT NAME	MAYFIELD SOLAR
DRAWING TITLE	TREE EXHIBIT

SCALE	PURPOSE CODE	SHEET SIZE	REV.	SHEET
1" = 2000'	ISSUE FOR PERMIT	17" x 11"	00	1 OF 1

Request No. 54:

Explain whether there will be vegetation clearing for construction. Provide the number of acres that will be cleared and any permits that will be required.

Response:

The Project anticipates clearing a maximum of 81 acres of vegetation. Permit needs for tree clearing activities will be determined in consultation with applicable state and federal agencies, but the Project does not anticipate the need for clearing-related permits at this time.

Responding Witness: Bob Roy

Request No. 55:

Provide a map showing all proposed areas of vegetative clearing within the Project site.

Response:

Please see attachment produced with Response No. 53.

Responding Witness: Jacqui Kitchen

Request No. 56:

Provide a photo or visual rendering of the perimeter fencing. Provide visual renderings of Project facilities with and without vegetative screening at highly visible locations around the Project site.

Response:

A photo of perimeter fencing is provided within the attachment to Response No. 53. See also the Response to Request No. 51. Visual renderings have not been prepared for the Project at this time.

Responding Witness: Matthew Batdorf

Request No. 57:

Refer to Exhibit H, SAR, Attachment E, Glare Analysis Results. The narrative description of results provided under the heading "North Arrays Analyses 4- 2 nd Story" is the same text as provided for "North Arrays Analyses 3- 1 st Story". Provide the correct summary of results for the "North Arrays Analyses 4- 2 nd Story" analysis.

Response:

After reviewing section "North Arrays Analyses 4- 2nd Story", Applicant updated from Analysis 3 to 4 and first-story to second-story in the text. The rest of the information is correct and no glare was predicted.

Responding Witness: Matthew Batdorf

Request No. 58:

Refer to the Exhibit H, SAR, Section 2, Item 14. Describe the glare anticipated to be generated on local roadways, including type of glare, number of minutes of glare, months of the year, and specific location of glare.

Response:

Based on the result of the glare analysis, there is no glare predicted to the surrounding road or receptors.

Responding Witness: Matthew Batdorf

Request No. 59:

State any concerns or comments provided by representatives of local churches.

Response:

To date, no representatives of local churches have expressed any concerns or provided comments to Project representatives regarding impacts to local churches.

Responding Witness: Jacqui Kitchen

Request No. 60:

Provide any available transcripts of the public meetings.

Response:

To best of Applicant's knowledge, no transcripts are available.

Responding Witness: Jacqui Kitchen

Request No. 61:

Provide any written or oral comments offered by the public or government agencies, from public meetings or through other communication methods, including the Project website.

Response:

Applicant received the following comments from the public and government agencies. At its public information meeting held on August 12, 2025, attendees discussed views, vegetative screening, property values, drainage, traffic, and construction activities with Project representatives. Several attendees expressing support for the jobs and tax base the Project would bring to Graves County. Through adjacent neighbor outreach conducted over the past year, in-person meetings with non-participating neighbors included discussions on trees, buffers, distance from infrastructure, construction noise, dust and traffic, and preservation of existing forested areas. Of note, the Project website has generated no inquiries to date.

Over the last two years, Applicant met with the Graves County Fiscal Court and Economic Development Department regarding project layout, schedule, neighbor outreach, job impacts, and tax revenues. Questions addressed during these meetings focused on construction durations, timing of Siting Board filings, use of the PARIA site for solar instead of heavy industry, and impact of proposed community benefits. To date, no formal written comments have been received from the Graves County Fiscal Court or Economic Development Department.

Collectively, this public feedback allowed for Project design to be refined to include 300-foot setbacks from non-participating residences, minimize tree clearing to the extent possible, and add landscape screening to various areas throughout the project layout as demonstrated in Response No. 52.

Responding Witness: Jacqui Kitchen

Request No. 62:

Explain whether a Complaint Resolution plan has been developed for the Project. If so, provide that document. If not, explain how MYSO will coordinate with local landowners or others in case of complaints or other issues that might arise during the course of construction or operations.

Response:

A formal Complaint Resolution plan has not been developed at this time but will be developed prior to commencing construction. The Applicant anticipates creating a program similar to those created in Starfire and Frontier solar projects.

Responding Witness: Jacqui Kitchen

Request No. 63:

Refer to Application, Exhibit G, Economic Analysis, Table 1 and Table 2 (which reflect a 12-month construction period). Provide revised tables, reflecting the 18- 24-month construction period (as stated in Attachment F of the SAR (Traffic Assessment)).

Response:

The IMPLAN model is a software tool that is based on annualized industry expenditure, jobs, and labor income data. The inputs for the model have to be annual data to allow for accurate modeling, resulting in the outputs being annual data.

Responding Witness: Fletcher Mangum

Request No. 64:

Refer to Application, Exhibit G, Economic Analysis, Table 2. Explain how the 101 total estimated construction FTEs were calculated, addressing footnote 27 which refers to data provided by Bright Night. Include in the response the information provided from Bright Night.

Response:

Project representatives provided the preliminary modeling assumption of 225 full time equivalent (FTE) jobs over 18 months, with an assumed 30 percent in-state construction labor.

Responding Witness: Fletcher Mangum

Request No. 65:

Refer to Application, Exhibit G, Economic Analysis at 14, which states 340 FTE local and non-local construction jobs. Explain the inconsistency with the data in Table 2, which shows 101 construction jobs.

Response:

340 local and non-local FTE construction jobs is the total number of construction FTEs associated with the project. The 101 construction FTEs are the assumed in-state construction FTEs that were modeled to estimate the statewide impact.

Responding Witness: Fletcher Mangum

Request No. 66:

Refer to Application, Exhibit G, Economic Analysis. Table 2. Confirm the number of construction workers, given that the Traffic Assessment (Attachment F of the SAR) assumes a workforce of up to 250 workers at one time during a 7–9-month peak construction period.

Response:

The economic impact analysis was based on the assumption of 225 FTEs over an 18-month period, which was annualized to allow consistency with the IMPLAN model resulting, in approximately 340 FTEs over a 12-month period.

Responding Witness: Fletcher Mangum

Request No. 67:

Refer to Application, Exhibit G, Economic Analysis, Table 1. Confirm and provide a source for the employment multiplier for Graves County is 3.9. If correct, explain why that multiplier is unusually large. If incorrect, provide a revised table.

Response:

The analysis of the construction impact is based on a proprietary IMPLAN model developed by Fletcher Mangum. The model incorporates numerous industries to estimate the direct impact of local construction labor and sourcing, as well as the indirect and induced impact of per diem spending of non-local construction labor. The employment multiplier is therefore different from basic analyses based on one industry.

Responding Witness: Fletcher Mangum

Request No. 68:

Refer to Application, Exhibit G, Economic Analysis, Table 1. State the sector name and number used to determine the employment multiplier for Graves County.

Response:

Please see Response No. 67.

Responding Witness: Fletcher Mangum

Request No. 69:

Refer to Application, Exhibit G, Economic Analysis, Table 2. Confirm and provide a source for the employment multiplier of 3.02. If correct, explain why that multiplier is unusually large. If incorrect, provide a revised table.

Response:

Please see Response No. 67.

Responding Witness: Fletcher Mangum

Request No. 70:

Refer to Application, Exhibit G, Economic Analysis, Table 3 and Table 4. Confirm the employment multipliers. If correct, explain why those multipliers are so large. If not confirmed, provide revised tables.

Response:

The analysis of the ongoing operational impact is based on a proprietary IMPLAN model developed by Fletcher Mangum. The model incorporates numerous industries to estimate the direct impact of local maintenance operations, as well as the indirect and induced impact of additional locally sourced services in support of operations. The employment multiplier is therefore different from basic analyses based on one industry.

Responding Witness: Fletcher Mangum

Request No. 71:

Refer to Application, Exhibit G, Economic Analysis, Table 5. Explain why the Graves County employment multiplier used for decommissioning is lower than that applied for construction.

Response:

The analysis of the decommissioning impact is based on a proprietary IMPLAN model developed by Fletcher Mangum. The model incorporates numerous industries to estimate the direct impact of the decommissioning labor and sourcing, as well as the indirect and induced impact of per diem spending of non-local construction labor and additional locally sourced services. The employment multiplier is different from the construction analysis because the analysis is based on different industries.

Responding Witness: Fletcher Mangum

Request No. 72:

Refer to Application, Exhibit G, Economic Analysis, Table 12. Confirm that agricultural wages and benefits of $132,000 per full time job reflect current agricultural wages in Graves County and provide a source. If not confirm, explain the basis for that amount.

Response:

Employment in the agricultural sector in the IMPLAN model consists of "employees" and "proprietors". The average employee wages and benefits in the sectors modeled in Graves County are $37,150 while the average proprietor income for the industries modeled in Graves County is $159,950 based on IMPLAN 2023 data (the latest available at the time of the analysis). The calculated average of $132,000 (in 2025 dollars) consists of 3.1 proprietors and 0.6 employees (rounded to a total of 4 in Table 12 of the analysis).

Responding Witness: Fletcher Mangum

Request No. 73:

Refer to Application, Exhibit G, Economic Analysis, Table 12. Explain whether the calculation of economic output reflects the acreage and value of corn and soybean production on the Project site.

Response:

The analysis is based on a 1,500-acre tract of land. The calculations of the economic output are based on data from the U.S. Department of Agriculture and the IMPLAN Group, LLC for Graves County.

Responding Witness: Fletcher Mangum

Request No. 74:

Refer to Application, Exhibit G, Economic Analysis. Provide information, assumptions and calculations reflecting the economic benefits of lease payments to local landowners.

Response:

The analysis models the estimated local economic benefits associated with additional local household income from the portion of the total lease payments that would be local. The value of the local lease payments is confidential.

Responding Witness: Fletcher Mangum

Request No. 75:

Refer to Application, Exhibit G, Economic Analysis. Provide a table presenting net economic benefits of the Project over the life of the Project, accounting for construction and operational benefits, loss of agricultural activity and lease payment spending.

Response:

The attached table shows the local economic benefit from construction, ongoing operations, and decommissioning over the life of project, as well as the economic benefit of the current agricultural use over the life of the project, and the resulting net economic benefit. The net economic benefit is estimated at approximately 185 jobs, minus $4.0 million in wages and benefits, and $39.2 million in economic output.

The net wages and benefits are negative because the direct wages and benefits for the agricultural use were based on the IMPLAN model's average wages and benefits and the average employment assumptions for the industry, which resulted in 3.1 proprietors and 0.6 direct employees (please refer to Response No. 72 for additional details). In contrast, the direct wages and benefits in the solar operations analysis were only based on the employee wages provided by BrightNight.

Responding Witness: Fletcher Mangum

Graves County Net Impact	Employment	Wages and Benefits	Output
Construction	125	$5,507,300	$22,485,200
Operations	276	$13,671,100	$62,445,200
Decommissioning	63	$4,834,200	$18,346,100
Total Mayfield Solar Economic Benefit	**464**	**$24,012,600**	**$103,276,500**
Current Agricultural Use	279	$28,048,500	$64,070,900
Total Current Use Economic Benefit	**279**	**$28,048,500**	**$64,070,900**
Net Economic Benefit	**185**	**-$4,035,900**	**$39,205,600**

Request No. 76:

Refer to Application, Exhibit G, Economic Analysis and Exhibit I Decommissioning Plan. Explain whether the life of the Project is 30 years or 40 years. Revise fiscal impact calculations, if necessary.

Response:

The life of the Project is 40 years. The Decommissioning Plan stated 30 years in error and should be 40 years; but the typographical error does not change the substance or findings therein.

Responding Witness: Matthew Batdorf

Request No. 77:

Explain whether MYSO has had any conversations with Graves County officials regarding the potential for an Industrial Revenue Bond (IRB).

Response:

Mayfield Solar has not had any conversations with Graves County officials regarding a potential IRB to date.

Responding Witness: Jacqui Kitchen

Request No. 78:

Refer to Application, Exhibit I, Decommissioning Plan. Explain whether the plan for decommissioning includes decommissioning of the battery storage area.

Response:

When the BESS is decommissioned, BESS infrastructure will be removed, battery modules transported to the manufacturer or a licensed recycler per federal/state regulations, and the area restored to a condition substantially similar to pre-construction conditions.

Responding Witness: Jacqui Kitchen

Request No. 79:

Refer to Application, Exhibit I Decommissioning Plan. Provide the decommissioning costs for the battery storage area and BESS units/PCSs. Revise net decommissioning costs, if necessary.

Response:

The Project's BESS-specific cost estimate is currently unknown, pending vendor selection. If BESS is included, the Decommissioning Plan will be updated to include these costs.

Responding Witness: Matt Batdorf

Request No. 80:

Provide a list of all permits required from other local, state or federal agencies for the construction and operation of the Project, indicating the specific agency, permit type and applicability to the Project.

Response:

Please see attached.

Responding Witness: Jacqui Kitchen

Mayfield Solar				
Permit/Approval	**Permitting Authority**	**Activities**	**Likelihood to Obtain**	**Permit Submittal Status**
Federal				
Clean Water Act Sec. 404 and/or Section 10 Permit(s)	U.S. Army Corps of Engineers (USACE)	Placement of Dredge or Fill Material in a Waters of the U.S.	To be Determined	Not yet submitted.
Endangered Species Act Section 7 Consultation	U.S. Fish and Wildlife Service (USFWS)	Federal Endangered Species Act-Listed Species and/or Critical Habitat presence; Section 7 Consultation is required if a federal permit or other federal action is required, or the project involves federal funding.	To be Determined	Not yet submitted.
National Historic Preservation Act (NHPA) Section 106	Kentucky Heritage Council — State Historic Preservation Office (KHC-SHPO)	Required if federal permit is required or the project involves federal funding. May require cultural site surveys and historic properties analysis.	To be Determined	Not yet submitted.
Pre-Screening Tool and Determination	Federal Aviation Administration (FAA)	Filing with the FAA must occur prior to construction if certain height, location, frequency, or slope criteria are met or if filing has been requested by the FAA.	Low	Not yet submitted.
Spill Prevention, Control, and Countermeasures (SPCC) Plan	U.S. Environmental Protection Agency (EPA)	Before a facility is subject to the SPCC Rule, it must meet three criteria: 1) it must be nontransportationrelated; 2) it must have an aggregate aboveground storage capacity greater than 1,320 gallons or a completely buried storage capacity greater than 42,000 gallons; and 3) there must be a reasonable expectation of a discharge into or upon navigable waters of the United States or adjoining shorelines.	Low	Not yet submitted.
State				
Kentucky Endangered Species Protection	Kentucky Department of Fish and Wildlife Resources (KDFWR)	Incidental take of a Kentucky-listed endangered or threatened species.	To be Determined	Not yet submitted.
Construction Certificate	Kentucky State Siting Board	Construction of electric generating facilities and transmission lines that are not regulated by the Kentucky Public Service Commission.	Required	Application submitted; case in progress with KSB.
Plan Review	Kentucky Dept. of Housing, Buildings and Construction	New construction or renovations - Plan review needed to obtain a building permit.	Required	Not yet submitted.
Certificate of Occupancy	Kentucky Dept. of Housing, Buildings and Construction	Issued when construction is found to be in compliance with all applicable building codes and regulations.	Required	Not yet submitted.
Federal Water Pollution Control Act/Kentucky Pollutant Discharge Elimination System (KPDES)	Kentucky Energy & Environment Cabinet (EEC), Division of Water (DOW)	All discharges to waters of the Commonwealth of Kentucky	Required	Not yet submitted.
Kentucky KYR100000 Construction General Permit for Discharges from Construction Activities	Kentucky EEC, DOW	Stormwater runoff from construction areas greater than 1 acre.	Required	Not yet submitted.
Section 401 Water Quality Certification	Kentucky EEC, DOW	Any work or deposit/placement of dredged or fill material in streams or wetlands. Required if Section 404 permitting is required.	To be Determined	Not yet submitted.
State Floodplain Construction General Permit	Kentucky EEC, DOW	All construction across, along, or adjacent to a stream (i.e., the base floodplain) or in the floodway of a stream for which a constrauction permit is required pursuant to KRS 151.250, 44 C.F.R. Part 6, and 44 C.F.R. 64.3.	High	Not yet submitted.
Overweight/Over-dimensional permit(s)	Kentucky Transportation Cabinet (KYTC)	Transportation and use of oversize and/or overweight vehicles on KYTC roads.	High	Not yet submitted.
Encroachment/Driveway Permit(s)	KYTC	Construction of a driveway within a KYTC right-of-way	To be Determined	Not yet submitted.
Utility Crossings	KYTC	Utility work within a KYTC right-of-way.	To be Determined	Not yet submitted.
Zoning permit	Kentucky Airport Zoning Commission (KAZC)	All structures built on or near an airport must be approved/permitted by the KAZC. This includes but is not limited to buildings, antenna towers, water towers, electrical power lines (above ground), runway and taxiway extensions, apron expansion, parking lots and construction cranes.	Low	Not yet submitted.
Local				
No local permits required.				

Request No. 81:

Provide any materials submitted to other permitting agencies related to this Project.

Response:

None have been submitted to other permitting agencies for this Project to date.

Responding Witness: Bob Roy

Request No. 82:

Provide a copy of the stormwater management plan for the project.

Response:

The Project's selected EPC Contractor will develop this plan and obtain the appropriate permits regarding stormwater and groundwater. Therefore, no plan is currently available. When developed, the plan will comply with all applicable regulations.

Responding Witness: Bob Roy

Request No. 83:

Provide any environmental studies that have been completed for the project including Phase I Environmental Site Assessment for the Project.

Response:

Please find the Project's environmental studies attached separately due to file size limits.

Responding Witness: Bob Roy

Request No. 84:

Provide any historic or archeologic studies that have been planned or completed for the project site.

Response:

Please see attached.

Responding Witness: Bob Roy

Technical Memorandum

Cultural Resource Survey

Mayfield Solar Project – MYSO, LLC – Graves County, Kentucky
Project Registration Number: FY24-12604

Prepared for: Internal Review

Prepared by: Bacon Farmer Workman Engineering & Testing, Inc.

Date: March 17, 2025

1 Introduction

Bacon Farmer Workman Engineering & Testing, Inc. (BFW) was contracted by MYSO, LLC to assess the Mayfield Solar site as part of a desktop review for this project. The study area encompasses 70 parcels totaling approximately 2,080 acres within Graves County, Kentucky. It consists mainly of agricultural fields with some scattered woodlots, fencerows, and channelized wooded stream corridors. The study area is surrounded mainly by agricultural land, with the eastern edge of the property bordering a railroad and Mayfield Creek. U.S. Highway 45 runs north-to-south on the western side of the study area and some rural residential, commercial, light industrial, and institutional development is present around US 45 and KY 1241, a smaller road which runs in a roughly parallel direction. The study area is relatively flat, and the eastern section of the study area lies in the floodplain of Mayfield Creek. Two perennial tributaries to Mayfield Creek also have floodplain in low lying areas along their channels.

No occupied structures are currently present within the site. A few outbuildings such as barns are scattered through the study area, and a cell phone tower is present in the northwestern part of the study area near US 45. Historical mapping depicts many buildings within the study area in the past, but these structures have been largely removed. Some foundations are still present. According to historical aerials, much of the area has been farmed for many years but was populated with residential housing. In previous years, the property was purchased by the Purchase Area Regional Industrial Authority, Inc. to pursue industrial development for the area. Many of the previous residential homes on the property were demolished as a part of that effort.

The Mayfield Solar Project will involve the construction of solar panels along with associated on-site power lines, access roads, a substation, battery storage, and other required infrastructure. The overall project will include a gen-tie line to connect to electric infrastructure owned by other entities, but the gen-tie line is not included in the scope of this study. Final designs for the Mayfield Solar project are not complete, but the project requires a review to identify any resources that may be present.

2 Archaeological Resources Consultation

BFW submitted a request to the Kentucky Office of State Archaeology on November 11, 2023, for archaeological site and survey data. Based on this request, research indicates that there were four Archaeological Surveys performed within the property boundary mapped by the Property Valuation Administrator (PVA). The surveys are identified in **Table 2-1** and the associated map can be found in **Attachment A**. Based on the desktop review, the following surveys and sites were identified within the project boundary and given survey numbers by the Kentucky Heritage Council (KHC).

Table 2-1 – Archaeological Surveys

Survey #	Year Completed	Survey Type
042-003	1976	An Archaeological Survey of the Proposed Realignment of U.S. 45, Graves and McCracken Counties, Kentucky
004-027	1992	Cultural Resource Survey Mayfield Ditch, Ballard, Carlisle, McCracken and Graves Counties, Kentucky
042-017	1993	A Phase I Investigation of Archaeological Resources at the Proposed Location of a TVA Customer Service Center at Folsomdale in Graves County, Kentucky
042-053	2010	Archaeological Survey of Selected Tracts in Purchase Regional Industrial Park and NRHP Evaluation of 15Gv37 in Graves County, Kentucky

Of these surveys, #042-003 was conducted in 1976 along several miles of the U.S. Highway 45 corridor and this survey overlaps the northwestern edge of the study area. Survey #004-027 was conducted in 1992 along several miles of Mayfield Creek (Mayfield Ditch) and overlaps part of the northeastern and southeastern study area. Survey #042-017 was conducted in 1993 on one parcel on the east side of U.S. Highway 45 near its intersection with KY 849E and is located entirely outside of the study area.

Survey 042-053 was conducted in 2010 on several parcels throughout the project area. It covered several large areas on a Phase I level and several additional smaller areas at a more detailed Phase II or III level. It included a National Register of Historic Places (NRHP) evaluation of site 15Gv37. The list of archaeological surveys associated with Survey 042-053 presented in the KyOSA tabular data appears to be truncated and may be incomplete. However, the survey reports archived at the Kentucky Heritage Council (KHC) include data on all of the archaeological sites investigated for this survey.

The Kentucky Office of State Archaeology database request returned 18 records for known archaeology sites within the site boundary, and this site is summarized in **Table 2-2.**

Table 2-2 – Archaeological Sites

SITE #	SITE TYPE	NRHP Status
15Gv37	Military	Eligible for National Register
15Gv39	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv40	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv41	Open Habitation w/o Mounds	Inventory site (does not presently meet NR criteria)
15Gv42	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv43	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv44	Open Habitation w/o Mounds	Inventory site (does not presently meet NR criteria)
15Gv45	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv46	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv47	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv48	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv49	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv50	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv51	Open Habitation w/o Mounds	Inventory site (does not presently meet NR criteria)
15Gv52	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv53	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv54	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)
15Gv55	Historic Farm / Residence	Inventory site (does not presently meet NR criteria)

Archaeological site 15Gv37, classified as a military site, measures approximately 34 acres and is located east of Whittemore Road near its intersection with Old Plant Road. This site was evaluated for NRHP eligibility during Survey #042-053, “Survey of Selected Tracts in Purchase Regional Industrial Park and NRHP Evaluation.” The evaluation recommended that Site 15Gv37 was eligible to be placed on the NRHP. Other archaeological site types

identified within the project boundary included “Open habitation without mounds” and “Historic farm / Residence.” Of the remaining 17 archaeological sites within the project boundary, none have been recommended as being eligible for the NRHP at this time.

Although parts of the Mayfield Solar study area have been covered by previous archaeological surveys, the surveys date from 1976 to 2010. The KHC / State Historic Preservation Office (SHPO) has issued revisions to its *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports* in 2001 and 2006 (with minor additional revisions in 2017) since the initial publication of the guidelines in 1991. Some of the revisions involve the establishment of more stringent standards for shovel testing of archaeological sites. **Therefore, some of the archaeological survey areas within the property boundary may not meet current standards and may require new archaeological surveys.** The new surveys could identify new archaeological sites or areas that were assessed under survey methods that do not meet the current standards. In addition, since Site 15Gv37 was previously determined to be NRHP eligible, further review of the previous report and an evaluation of the current project layout will need to be performed to determine if the project has the potential to impact this site.

3 Cultural Resources Consultation

BFW performed a search from the KHC Cultural Resource Portal Web Service to determine the number, nature, and location of known “above ground” cultural resources in the project area.

The database results showed 13 “coded properties” within the project boundary. These resources were surveyed as part of an informal survey in 2004. Table 3-1 provides a list of these properties.

Table 3-1 – KHC Coded Properties

SITE #	SITE TYPE	Site Status
GV 63	248 Pittman Road – Single Dwelling – 1925-1949	Non-Extant
GV 64	150 Pittman Road – Single Dwelling – 1950-1974	Non-Extant
GV 65	1094 East Baldree Road – Single Dwelling – 1900-1924	Non-Extant
GV 66	1620 East Baldree – Single Dwelling – 1925-1949	Non-Extant
GV 67	1678 East Baldree – Single Dwelling – 1925-1949	Non-Extant
GV 68	1678 East Baldree – Single Dwelling – 1900-1924	Non-Extant
GV 69	415 Pittman Road – Single Dwelling – 1925-1949	Non-Extant

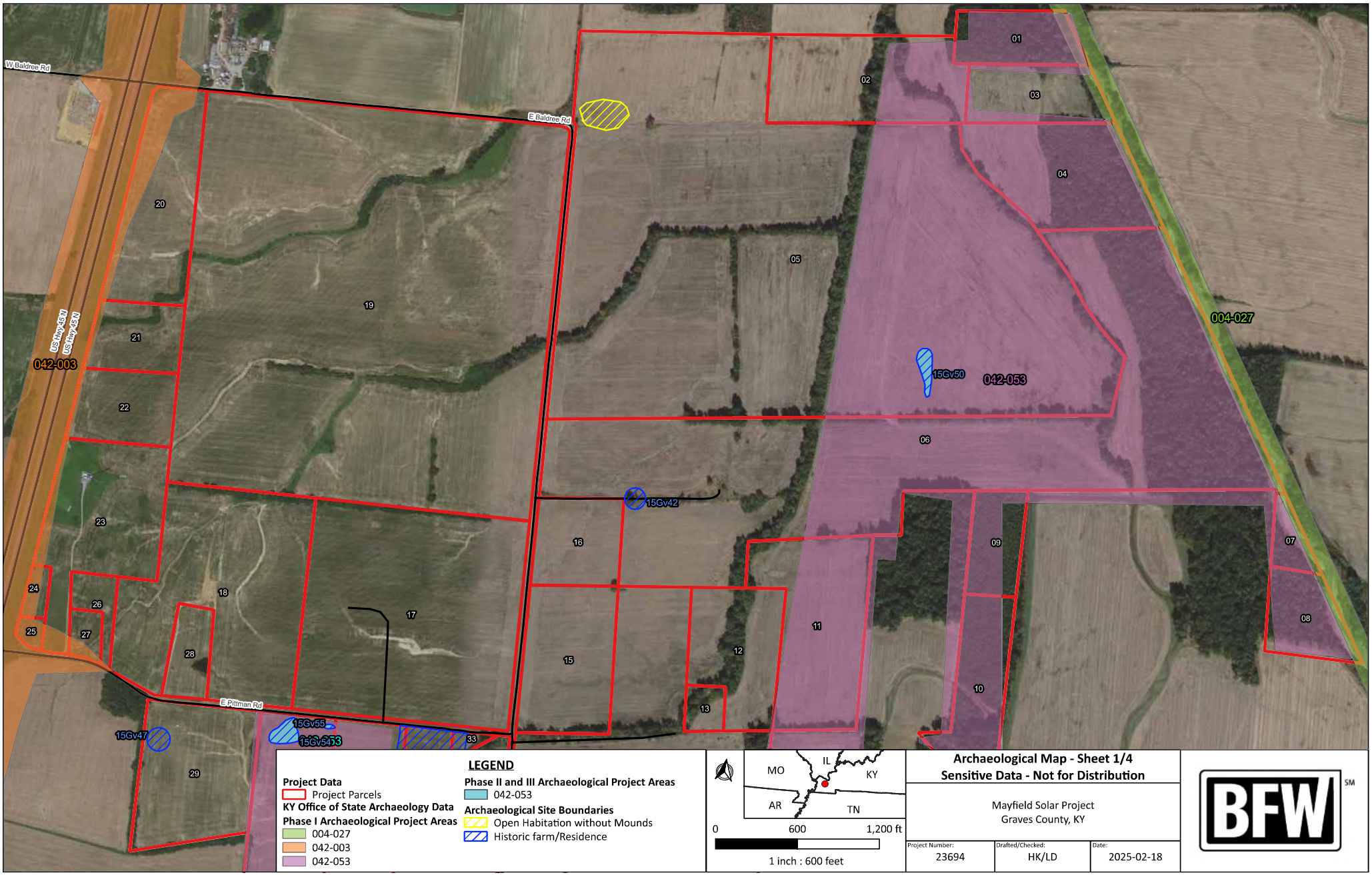
SITE #	SITE TYPE	Site Status
GV 70	104 Pittman Road – Single Dwelling – 1900-1925	Non-Extant
GV 59	Viola Ammunition Plant Building #1 – Military – 1925-1949	Non-Extant
GV 60	Viola Ammunition Plant Building #2 – Military – 1925-1949	Non-Extant
GV 61	Viola Ammunition Plant Building #3 – Military – 1925-1949	Non-Extant
GV 62	Viola Ammunition Plant Building #4 – Military – 1925-1949	Non-Extant
GV 229	Old Railroad Bridge	Non-Extant

In 2024, a Phase I ESA survey was performed which included field verification of the above listed sites. All of the sites are no longer extant, and a new railroad bridge has been constructed at the location of GV 229. Based on these findings, the Mayfield Solar project will not impact any aboveground cultural resources.

The area of potential effect (APE) of this project should take into consideration all areas subject to potential direct impacts from the proposed undertaking, including temporary easements, staging, existing right of way and new right of way (if applicable). For this project, only parcels directly associated with the project were reviewed. A larger APE will need to be established once the final project scope has been determined. The APE should include a one-mile buffer to each parcel boundary to also account for potential direct and indirect effects in the viewshed.

No detailed analysis of aboveground resources within the one-mile buffer has been conducted at this time. However, the initial review of the KHC Cultural Resource Portal Web Service indicated that there are no above ground resources within the project boundary that will be affected by the project.

Attachment A
Maps



LEGEND

Project Data
- Project Parcels

KY Office of State Archaeology Data

Phase I Archaeological Project Areas
- 004-027
- 042-003
- 042-053

Phase II and III Archaeological Project Areas
- 042-053

Archaeological Site Boundaries
- Open Habitation without Mounds
- Historic farm/Residence

0 600 1,200 ft

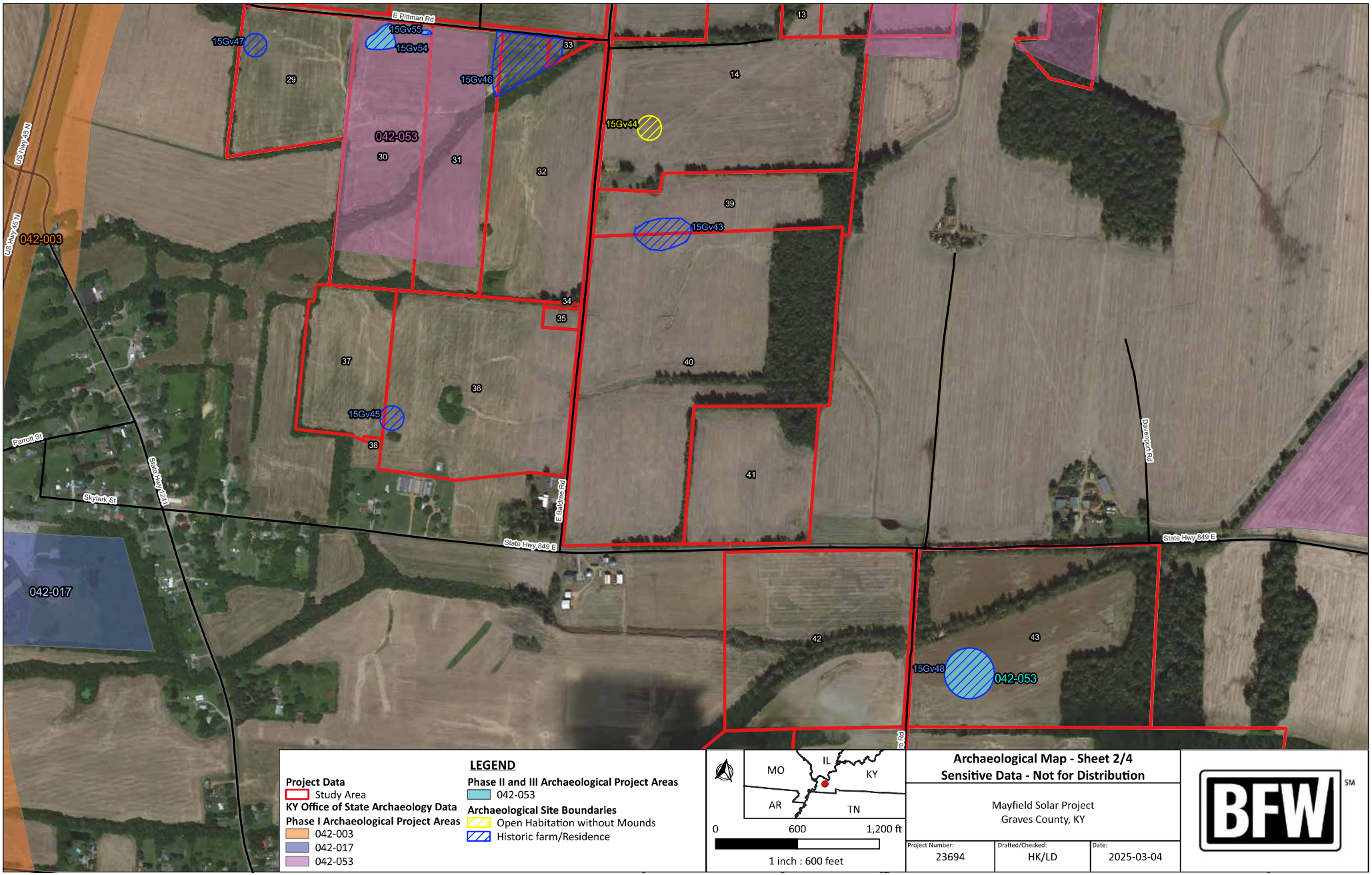
1 inch : 600 feet

Archaeological Map - Sheet 1/4
Sensitive Data - Not for Distribution

Mayfield Solar Project
Graves County, KY

Project Number:	Drafted/Checked:	Date:
23694	HK/LD	2025-02-18

BFW SM



LEGEND

Project Data
- Study Area

KY Office of State Archaeology Data

Phase I Archaeological Project Areas
- 042-003
- 042-017
- 042-053

Phase II and III Archaeological Project Areas
- 042-053

Archaeological Site Boundaries
- Open Habitation without Mounds
- Historic farm/Residence

0 600 1,200 ft

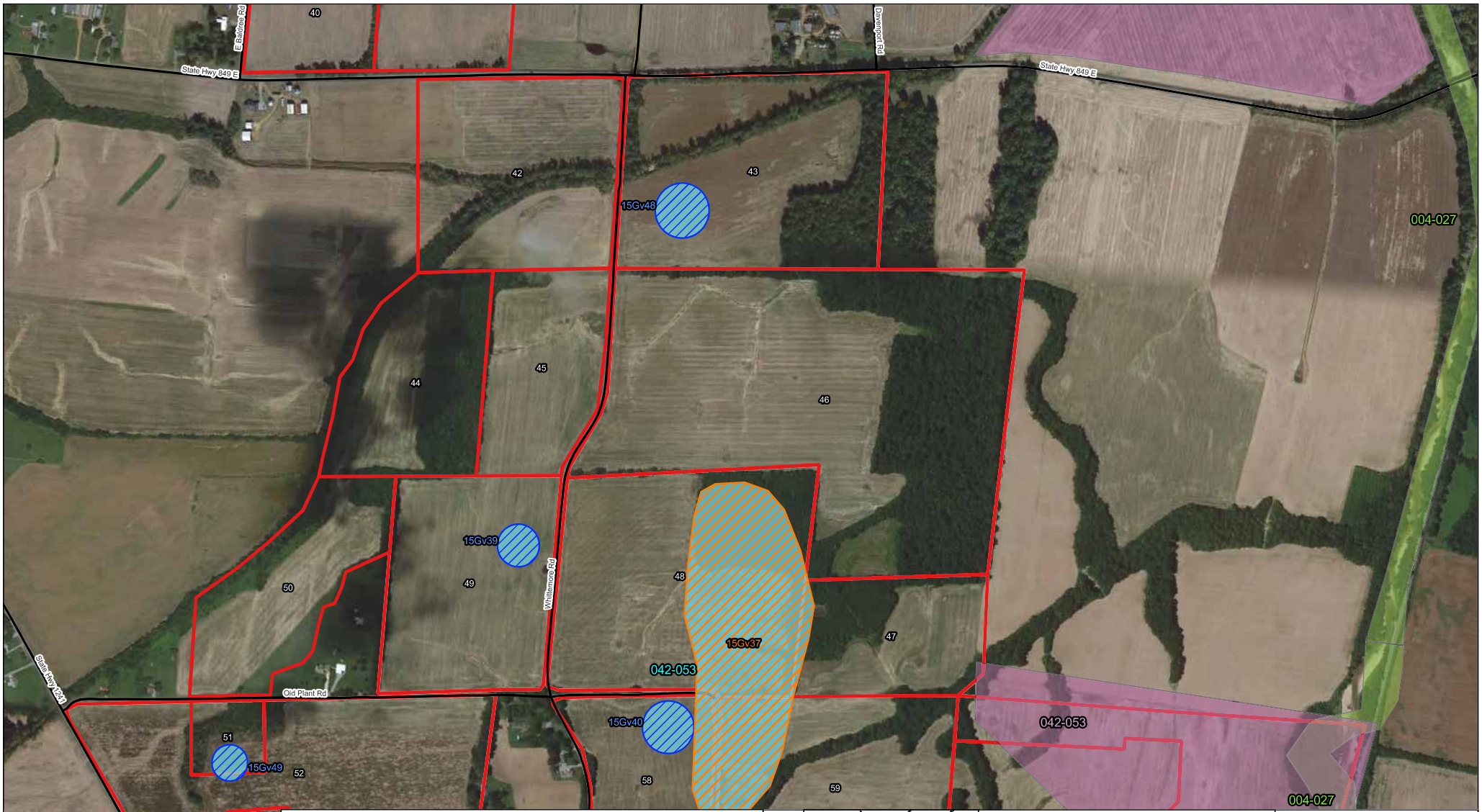
1 inch : 600 feet

Archaeological Map - Sheet 2/4
Sensitive Data - Not for Distribution

Mayfield Solar Project
Graves County, KY

Project Number:	Drafted/Checked:	Date:
23694	HK/LD	2025-03-04

BFW SM



LEGEND

Project Data
- Study Area

KY Office of State Archaeology Data

Phase I Archaeological Project Areas
- 004-027
- 042-053

Phase II and III Archaeological Project Areas
- 042-053

Archaeological Site Boundaries
- Open Habitation without Mounds
- Historic farm/Residence
- Military

0 600 1,200 ft

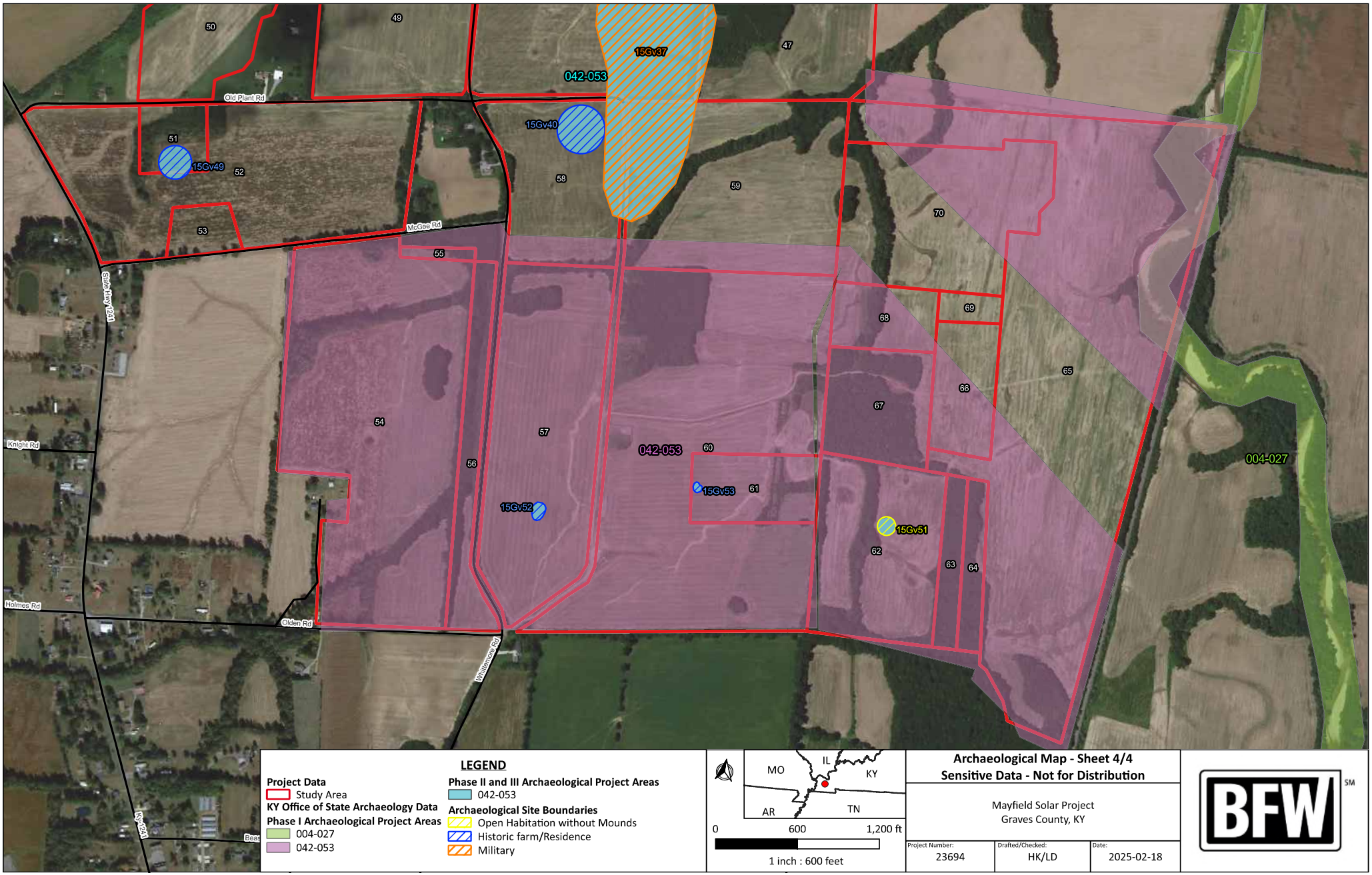
1 inch : 600 feet

Archaeological Map - Sheet 3/4
Sensitive Data - Not for Distribution

Mayfield Solar Project
Graves County, KY

Project Number:	Drafted/Checked:	Date:
23694	HK/LD	2025-02-18

BFW SM


50
49
47
15Gv37
042-053
Old Plant Rd
15Gv40
51
15Gv49
52
58
59
70
53
McGee Rd
55
State Hwy 1241
69
68
65
66
67
54
57
042-053
60
Knight Rd
56
004-027
15Gv53
61
15Gv52
15Gv51
62
63
64
Holmes Rd
Olden Rd
Whitemore Rd
Ky-1241
Bea
LEGEND
Project Data
Study Area
KY Office of State Archaeology Data
Phase I Archaeological Project Areas
004-027
042-053
Phase II and III Archaeological Project Areas
042-053
Archaeological Site Boundaries
Open Habitation without Mounds
Historic farm/Residence
Military
MO
IL
KY
AR
TN
0
600
1,200 ft
1 inch : 600 feet
Archaeological Map - Sheet 4/4
Sensitive Data - Not for Distribution
Mayfield Solar Project
Graves County, KY
Project Number:
23694
Drafted/Checked:
HK/LD
Date:
2025-02-18
BFW
SM

Additional Archaeological Records Review

Previous Archaeological Investigations

As previously stated, archaeological records on file at the Kentucky Office of State Archaeology (OSA) in Lexington were researched on April 1, 2025 (OSA Registration #FY24-12604). A total of seven previous professional archaeological investigations have been conducted within a 2 km radius of the Study Area. Of these, five investigations (Bosworth 2003, Foster and Schock 1976, Johnson 2004, Oates 1992, and Ross et al. 2009) overlap with the Study Area parcels (Table 1). The previous investigations that overlap with the Study Area were mainly conducted for development associated with the industrial park, but, a minor amount of prior survey associated with the realignment of US 45 and proposed work along Mayfield Creek also overlaps with the Study Area. The previous surveys overlap with almost all the current Study Area, with only approximately 15 acres of land not having been previously surveyed (see Figure 1).

Table 1. Previous archaeological investigations within the Study Area.

SHPO ID	Reference	Purpose	Results	Recommendations
N/A	Bosworth 2003	Proposed railroad spur development for Paducah Regional Industrial Park in Graves County, Kentucky.	15Gv37-15Gv41	Eligible: 15Gv37. No Further Work: 15Gv38-15Gv41
042-003	Foster and Schock 1976	Proposed realignment of U.S. 45 in Graves and McCracken Counties, Kentucky	1 revisited site (15Gv2), 20 new sites (15Gv300-15Gv312, 15McN300-15McN306) and 34 "spot finds" that did not warrant state site numbers	Further Work: 15Gv306, 15Gv311 (both these sites are outside current Study Area parcels) No Further Work: 15Gv2, 15Gv300-15Gv305, 15Gv306-15Gv310, 15Gv312, 15McN300-15McN306
004-027	Oates 1992	Proposed cleaning, snagging, and re-excavation of the Mayfield Ditch in Ballard, Carlisle, McCracken, and Graves Counties, Kentucky	1 site (15Ba149), 2 previously recorded sites (15Ba104 and 15Ba105)	Avoidance/Testing of certain Ballard County sites - no further work for portion of survey that overlaps with current Study Area parcels.
N/A	Johnson 2004	Proposed Stage 2 Development of Paducah Regional Industrial Park in Graves County, Kentucky.	15Gv42 - 15Gv47	No Further Work
042-053	Ross et al 2009	A phase I archaeological survey of selected portions of the Purchase Regional Industrial Park in northern Graves County, Kentucky.	15Gv50-15Gv55 Revisits: 15Gv39, 15Gv40, 15Gv48, 15Gv49 NRHP Evaluation: 15Gv37 revisit	No Further Work

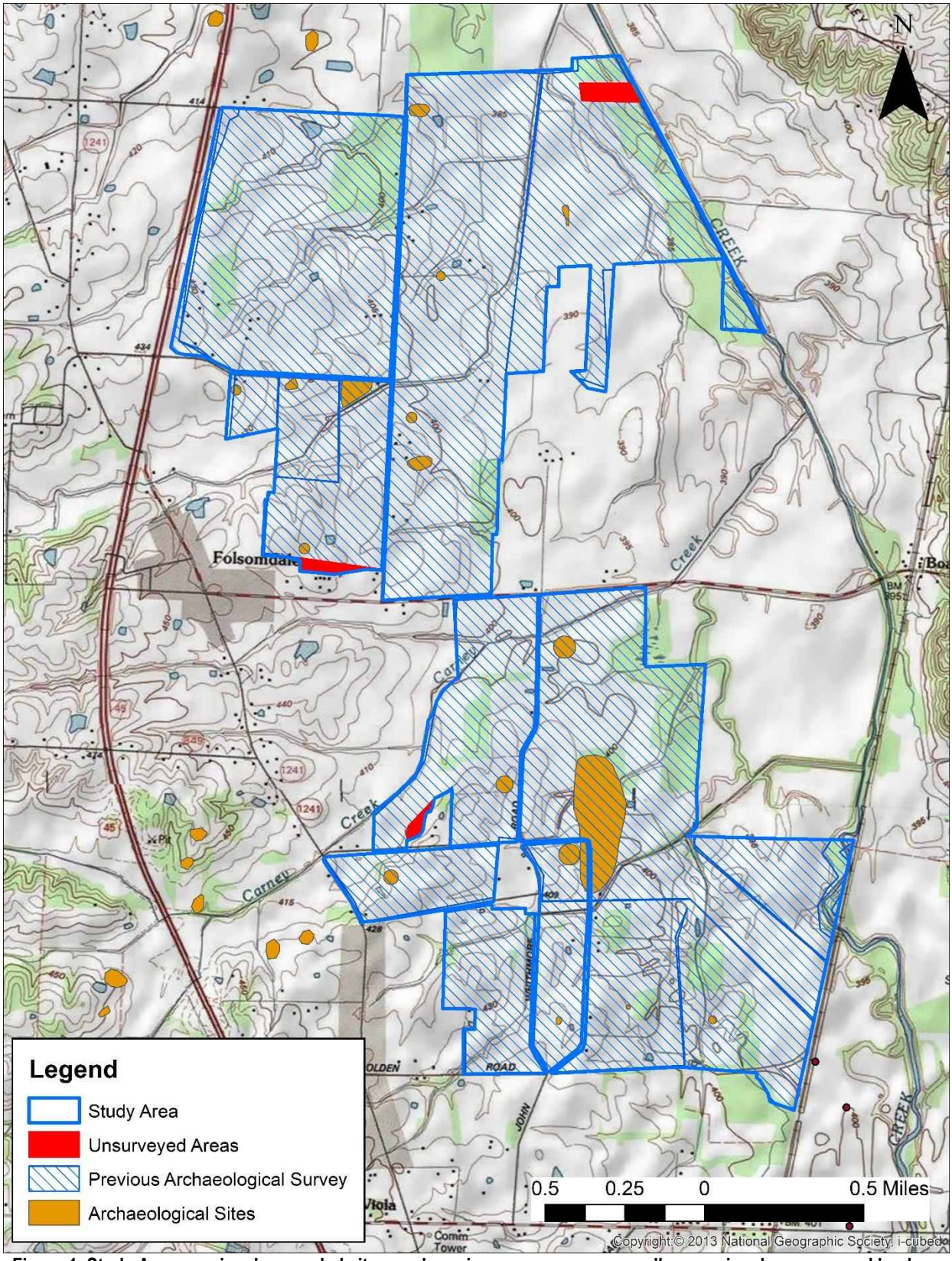


Figure 1. Study Area, previously recorded sites, and previous survey area, as well as previously unsurveyed land within the Study Area on the topographic quadrangle.

Previously Recorded Archaeological Sites

A total of 32 archaeological sites have been recorded in the 2-km radius of the Study Area. And, of these sites, 18 are within the Study Area (Table 2). A majority of these sites (n=12) were documented during the 2003 and 2004 surveys for the industrial park development. The remaining six sites were documented during the subsequent 2009 survey of the area. Also, previously recorded sites 15Gv39, 15Gv40, 15Gv48, and 15Gv49 were reinvestigated in 2009 to verify their locations and reassess their National Register of Historic Places (NRHP) eligibility. The NRHP eligibility of Site 15Gv37 was also assessed more thoroughly, specifically through archival research and some additional fieldwork. This site represents the remnants of the World War II era Viola Shell Loading Factory. The site does have significant historical associations with the war efforts but was determined to not contain sufficient integrity to be eligible for the NRHP.

Table 2. Previously recorded archaeological sites within the Study Area.

Site #	References	Site Type	Cultural Affiliation	NRHP Status
15Gv37	Bosworth 2003; Ross et al 2009	Military	Historic (1901 - 1950)	Not Eligible
15Gv39	Bosworth 2003; Ross et al 2009	Historic farm/residence	Unspecified Historic	Not Eligible
15Gv40	Bosworth 2003; Ross et al 2009	Historic farm/residence	Unspecified Historic	Not Eligible
15Gv41	Bosworth 2003	Multicomponent: open habitation w/o mounds, historic farm/residence	Unspecified precontact and historic (1901 - 1950)	Not Eligible
15Gv42	Johnson 2004	Historic farm/residence	Historic (1851 - 1950)	Not Eligible
15Gv43	Johnson 2004	Historic farm/residence	Historic (1851 - 1950)	Not Eligible
15Gv44	Johnson 2004	Open habitation w/o mounds	Precontact, Early Archaic	Not Eligible
15Gv45	Johnson 2004	Historic farm/residence	Historic (1851 - 1950)	Not Eligible
15Gv46	Johnson 2004	Historic farm/residence	Historic (1801 - 1950)	Not Eligible
15Gv47	Johnson 2004	Historic farm/residence	Historic (1851 - 1900)	Not Eligible
15Gv48	Bosworth 2003; Ross et al 2009	Historic farm/residence	Historic (1851 - 1950)	Not Eligible
15Gv49	Bosworth 2003; Ross et al 2009	Open habitation w/o mounds	Historic (1851 - 1950)	Not Eligible
15Gv50	Ross et al 2009	Historic farm/residence	Historic (1901 - 1950)	Not Eligible
15Gv51	Ross et al 2009	Open habitation w/o mounds	Precontact, indeterminate age/affiliation	Not Eligible
15Gv52	Ross et al 2009	Historic farm/residence	Historic (1901 - 1950)	Not Eligible
15Gv53	Ross et al 2009	Historic farm/residence	Historic (1901 - 1950)	Not Eligible
15Gv54	Ross et al 2009	Historic farm/residence	Historic (1901 - 1950)	Not Eligible
15Gv55	Ross et al 2009	Historic farm/residence	Historic (1901 - 1950)	Not Eligible

Summary and Recommendations

As a result of the review of the OSA records, most of the Study Area has been previously surveyed for archaeological sites. A total of 17 archaeological sites were previously recorded within the Study Area but no further archaeological work was recommended for any of the sites. About 15 acres of the Study Area has not been previously investigated and would require a phase I archaeological survey if it would be affected by any ground disturbing activities associated with a federal undertaking.

References Cited

Bosworth, Matthew. 2003. Phase I Archaeological Investigations for Proposed Railroad Spur Development for Paducah Regional Industrial Park in Graves Co., KY. Du Vall and Associates, Franklin 1N, 2003. Manuscript on File, Office of State Archaeology, University of Kentucky, Lexington.

Foster, Gary S., and Jack M. Schock. 1976. An Archaeological Survey of the Proposed Realignment of U.S 45, Graves and McCracken Counties, Kentucky. Western Kentucky University, Bowling Green, Kentucky. Manuscript on file, Office of State Archaeology, University of Kentucky, Lexington.

Johnson, Jodi. 2004. Phase I Cultural Resources Investigation for Proposed Stage 2 Development, Paducah Regional Industrial Park, Graves County, Kentucky. DuVall & Associates, Inc., Franklin, Tennessee. Manuscript Not on File, Office of State Archaeology, University of Kentucky, Lexington.

Oates, M. Tracy. 1992. Cultural Resource Survey Mayfield Ditch, Ballard, Carlisle, McCracken and Graves Counties, Kentucky. Mid-Continental Research Associates, Inc., Lowell, Arkansas. Manuscript on file, Office of State Archaeology, University of Kentucky, Lexington.

Ross, Jason T., Christopher L. Gunn, Steven R. Ahler, and Henry W. Goodman. 2009. Archaeological Survey of Selected Tracts in Purchased Reional Industrial Park and NRHP Evaluation of 15Gv37 in Graves County, Kentucky. UK-PAR Project No 10-19. University of Kentucky Program for Archaeological Research Department of Anthropology, Lexington. Manuscript on File, Office of State Archaeology, University of Kentucky, Lexington.

Cultural Resource Desktop Review

Mayfield Solar Project

Graves County, Kentucky

July 2025

Prepared for

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Prepared by

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1.0 INTRODUCTION

The purpose of this report is to describe the results of a site file search and literature review for the proposed Mayfield Solar Project (Project) in Graves County, Kentucky. A Tetra Tech archaeologist conducted a site file search and literature review of the Project Area of Potential Effects (APE) and a 1-mile buffer, which is referred to as the Research Area. The Research Area includes portions of the Melber (1995), Symsonia (1982), Hickory (1986) and Westplains (1996) quadrangles.

2.0 CULTURAL RESOURCES REGULATIONS AND POTENTIAL APPLICABILITY

A number of State and Federal laws intended to protect cultural resources may apply to the proposed Project. The following laws may apply to actions on Federal, State, or private land on which Federal actions (e.g., Federal permitting or funding) are required, or where state and local statutes apply:

Federal: Section 106 requires Federal agencies to take into account the effects of their undertakings on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. In addition, Federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), Indian Tribes (to include Alaska Natives) [Tribes], and Native Hawaiian Organizations (NHO).

State: Kentucky Antiquities Act: KRS 164.705 – KRS 164.735; KRS 164.990: The Kentucky Antiquities Act was created in 1962 and makes it public policy to preserve archaeological sites and objects of antiquity and to limit archaeological work (exploration, excavation, and collection) to qualified persons and institutions. It prohibits the willful damage or destruction of archaeological sites on lands owned or leased by the state, state agencies, counties, or municipalities, and requires a permit from the University of Kentucky's Department of Anthropology to explore or excavate archaeological sites on these lands. It requires anyone who discovers a site to report it to the Department. It is a felony to violate the sections of the Kentucky Antiquities Act prohibiting the willful destruction of archaeological sites and requiring permits to excavate.

Kentucky Cave Protection Act: KRS 433.871 – 433.885: The Kentucky Cave Protection Act makes it illegal, among other things, to disturb or damage cave surfaces or materials found inside caves, including archaeological remains. Archaeological investigations inside caves cannot be conducted without a permit from the State Archaeologist and must be carried out under the supervision of the State Archaeologist and the Kentucky Heritage Council. It is a misdemeanor to violate sections of this Act.

Notification of Discovery of Human Remains: KRS 72.020: Discovery of human remains require notification of appropriate law enforcement officials and the county coroner. Ostensibly this is intended to verify that the remains are not associated with a recent murder. The law applies to any individual, hospital, or institution that finds human remains.

Local: No county or municipal statues pertaining to the Project have been identified at this time.

3.0 METHODS

The site file search was conducted by requesting and reviewing data (Review Number P187844) provided by the Kentucky Office of State Archaeology (KOSA) Department of Anthropology at the University of Kentucky and Kentucky Heritage Council's Kentucky Historic Resources map database within the Research Area on June 18, 2025. The KOSA data includes records of all archaeological investigations that have been previously conducted, as well as all previously recorded archaeological sites and properties listed on the National Register of Historic Places (NRHP).

4.0 RESULTS

4.1 Previous Cultural Resource Investigations

Based on the shapefiles received from KOSA, three prior investigations have been undertaken within the Research Area (Table 1; Figures 1 and 2). The prior investigations include surveys for highway realignment, ditch repair, industrial park development and archaeological site evaluation projects. All three investigations intersect the Project Area.

Table 1 Previously Conducted Cultural Resource Investigations within the Research Area

SHPO ID Number	Author(s)	Title	Year
042-003	Gary S Foster, and Jack M. Schock	An Archaeological Survey of the Proposed Realignment of U.S. 45, Graves and McCracken Counties, Kentucky	1976
004-027	M. Tracy Oates	Cultural Resource Survey Mayfield Ditch, Ballard, Carlisle, McCracken and Graves Counties, Kentucky	1992
042-053	Jason Ross, Christopher Gunn and Steven Ahler	Archaeological Survey of Selected Tracts in Purchase Regional Industrial Park and NRHP Evaluation of 15Gv37 in Graves County, Kentucky	2010

4.2 Previously Identified Archaeological Resources

Based on the shapefiles received from the KOSA, 28 archaeological resources have been previously documented within the Research Area (Table 2; Figures 1 and 2). These resources consist of 19 historic sites, five prehistoric sites and four sites of undetermined cultural affiliation. Of the 28 archaeological resources, 19 are not eligible for the NRHP. The remaining nine resources have yet to be evaluated for their NRHP significance. All but two sites (15Gv306 and 15Gv309) are located within the Project Area. Site 15Gv37 was initially recorded in 2003 as eligible for the NRHP, however additional research and subsurface testing in 2010 revealed the site lacked the criteria necessary for inclusion onto the NRHP. A conversation with the Kentucky SHPO reviewer Dr. Brian Mabelitini on May 14, 2025, confirmed that the site is not eligible for the NRHP and no further management is necessary.

Table 2 Previously Recorded Archaeological Resources within the Research Area

Trinomial	Time Period	Site Type	NRHP Eligibility
15Gv37	Historic	Viola Shell Loading Factory	Not Eligible
15Gv38	Historic	Farmstead	Not Eligible
15Gv39	Historic	Farmstead	Not Eligible
15Gv40	Historic	Farmstead	Not Eligible
15Gv41	Historic	Habitation	Not Eligible

Trinomial	Time Period	Site Type	NRHP Eligibility
15Gv42	Historic	Farmstead	Not Eligible
15Gv43	Historic	Farmstead	Not Eligible
15Gv44	Prehistoric	Open Camp	Not Eligible
15Gv45	Historic	Farmstead	Not Eligible
15Gv46	Historic	Farmstead	Not Eligible
15Gv47	Historic	Farmstead	Not Eligible
15Gv48	Historic	Farmstead	Not Eligible
15Gv49	Historic	Farmstead	Not Eligible
15Gv50	Historic	Farmstead	Not Eligible
15Gv51	Historic	Habitation	Not Eligible
15Gv52	Historic	Farmstead	Not Eligible
15Gv53	Historic	Farmstead	Not Eligible
15Gv54	Historic	Farmstead	Not Eligible
15Gv55	Historic	Farmstead	Not Eligible
15Gv72	Undetermined	Undetermined	Unevaluated
15Gv73	Undetermined	Undetermined	Unevaluated
15Gv74	Undetermined	Undetermined	Unevaluated
15Gv75	Undetermined	Undetermined	Unevaluated
15Gv300	Prehistoric	Open Camp	Unevaluated
15Gv301	Historic	Unspecified	Unevaluated
15Gv306	Prehistoric	Open Camp	Unevaluated
15Gv307	Prehistoric	Open Camp	Unevaluated
15Gv309	Prehistoric	Open Camp	Unevaluated

4.3 Previously Identified Architectural Resources

Fourteen architectural resources were identified from the review of the Kentucky Heritage Council's Kentucky Historic Resources map database (Table 3; Figures 1 and 2). All of the architectural resources sans GV-229 and GV-231 are located within the Project Area. The existence and condition of these resources is undetermined. On Wednesday July 1, 20205, Tetra Tech engaged in a conversation with Nicole Konkol, Site Protection Manager at the Kentucky Heritage Council, who confirmed that architectural resources associated with an ineligible archaeological site would themselves also be considered ineligible. To that end, GV-59, GV-60, and GV-61 associated with the Viola site would not be considered eligible resources by KY SHPO.

Table 3 Previously Recorded Architectural Resources within the Research Area

Site Number	Name	Location	Site Status
GV-59	Viola Ammunition Plant Building #1	North Side Old Plant	Existence is Undetermined
GV-60	Viola Ammunition Plant Building #2	North Side Old Plant	Existence is Undetermined
GV-61	Viola Ammunition Plant Building #3	North Side Old Plant	Existence is Undetermined
GV-62	Viola Ammunition Plant Building #4	East Side Old Plant	Existence is Undetermined
GV-63	Charlie Allcock House #2	248 Pittman Road, Boaz, KY	Existence is Undetermined

Site Number	Name	Location	Site Status
GV-64	Charlie Allcock House #2	150 Pittman Road, Boaz, KY	Existence is Undetermined
GV-65	House	1094 East Baldree Road, Boaz, KY	Existence is Undetermined
GV-66	Charlie Thurston House	1620 East Baldree Road, Boaz, KY	Existence is Undetermined
GV-67	William Hendon House	1678 East Baldree Road, Boaz, KY	Existence is Undetermined
GV-68	House	1678 East Baldree Road, Boaz, KY	Existence is Undetermined
GV-69	Ira Garrett House	415 Pittman Road, Boaz, KY	Existence is Undetermined
GV-70	Reeves House	104 Pittman Road, Boaz, KY	Existence is Undetermined
GV-229	Railroad Bridge	Illinois Central Gulf Rail Line	Existence is Undetermined
GV-231	Railroad Bridge	Illinois Central Gulf Rail Line	Existence is Undetermined

4.4 Cemetery Properties

Nine cemeteries were identified from the quadrangle maps within the Research Area (Figures 1 and 2). Three of the cemeteries are located within the Project Area.

4.5 National Register of Historic Places Properties and Districts

No NRHP properties or districts are located within the Research Area.

5.0 SUMMARY

Twenty-eight archaeological resources were identified in the Research Area during this desktop study. Nine of these resources have yet to be evaluated for their NRHP significance and should be avoided by ground disturbing activity. The remaining 19 resources have been recommended as not eligible for the NRHP, and no further management is required.

Nine known cemeteries are located within the Research Area. However, all unmarked historic family cemeteries and known cemeteries or burials are to be avoided and protected as per KRS 72.020 which prohibits the disturbance of human burials.

Site 15Gv37 (Viola Shell Loading Factory) was initially recorded in 2003 as eligible for the NRHP, however additional research and subsurface testing in 2010 revealed the site lacked the criteria necessary for inclusion onto the NRHP. A conversation with Dr. Brian Mabelitini of the Kentucky Office of State Archaeology on May 14, 2025, confirmed that the site is not eligible for the NRHP and no further management is necessary. On Wednesday July 1, 20205, Tetra Tech engaged in a conversation with Nicole Konkol, Site Protection Manager at the Kentucky Heritage Council, who confirmed that architectural resources associated with an ineligible archaeological site would themselves also be considered ineligible. To that end, GV-59, GV-60, and GV-61 associated with the Viola site would not be considered eligible resources by KY SHPO. Based on the background research, Tetra Tech concludes that these structures would not be considered a constraint on development of the proposed solar facility.

The majority of the Project appears to have been impacted by historic and modern agricultural activities. Tetra Tech anticipates that there is moderate probability that unrecorded sites (such as historic farmsteads and prehistoric artifacts scatters and camps) could be located within the Project Area in proximity to Morris, Mayfield, Carney and Gilbert Creeks. Provided a federal or state nexus does

not exist, a cultural resource survey is not required for the Project. However, a reconnaissance level pedestrian survey Project areas in proximity of the creeks may help in identifying potential cultural resource constraints.

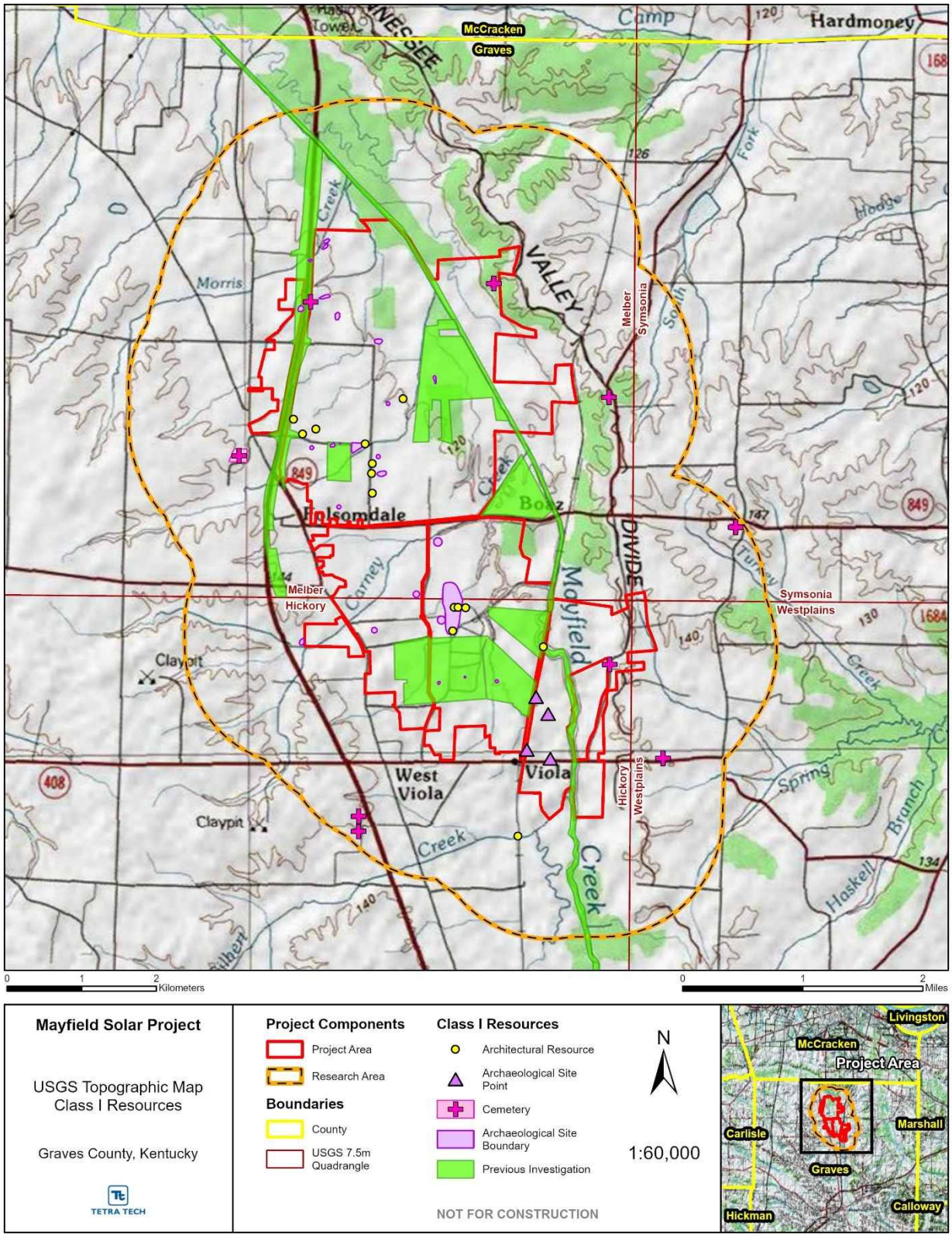

Figure 1 USGS Topographic Map of Results of Desktop Study.

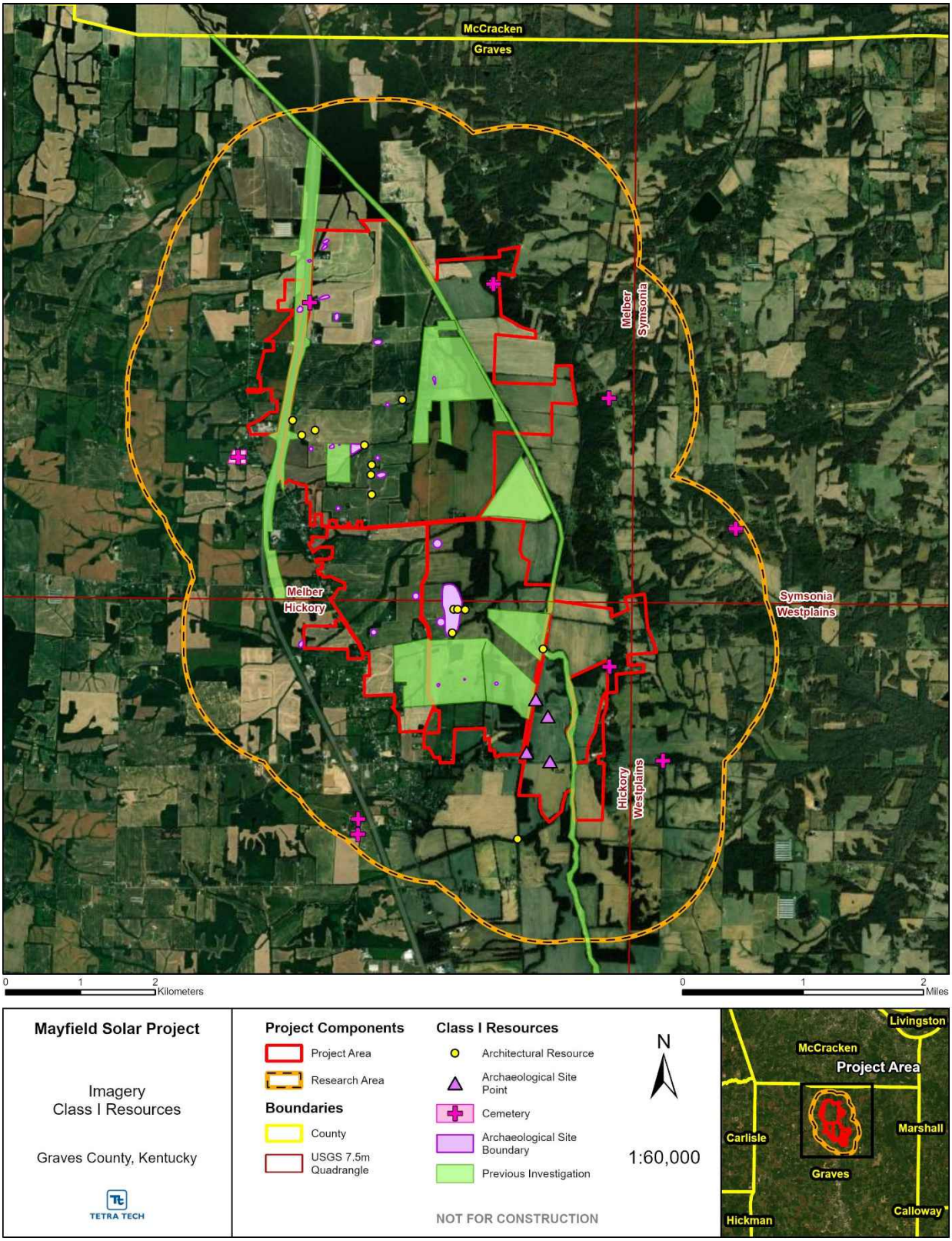

Figure 2 USGS Aerial Imagery Map of Results of Desktop Study.

Request No. 85:

Provide a copy of the Groundwater Protection Plan.

Response:

Please see Response No. 82.

Responding Witness: Bob Roy

Request No. 86:

Provide the Construction Dust Control Plan for the project.

Response:

A Construction Dust Control Plan will be prepared prior to construction by the EPC.

Responding Witness: Jacqui Kitchen

Request No. 87:

Provide any communication representatives of MYSO have had with any of the property owners surrounding the project. Explain whether any changes have been made to the project based upon those concerns.

Response:

Please see Response No. 61.

Responding Witness: Jacqui Kitchen

Request No. 88:

State the number of residential structures that may have a view of any portion of the Project, including fencing, solar arrays, substation or other infrastructure.

Response:

Based on available viewshed tools and best professional judgment, approximately 60-80 residences may have a limited view of some portion of the Project.

Responding Witness: Matthew Batdorf

Request No. 89:

Refer to Exhibit H, SAR, Attachment A, Plant Layout: Large areas of proposed solar arrays as well as part of the BESS facility sit within a FEMA floodplain. Explain:

a. Whether the applicant considered floodplains in its site selection process.

b. How the project will setback from and avoid floodplains.

c. Any changes in the site layout due to the existence of a floodplain (include in the response a revised site plan if applicable).

Response:

a. Floodplains were considered in site design.

b. The BESS and substation are sited on higher ground in the site interior, outside modeled scour/inundation areas, with pads elevated above the 100-year flood event.

c. See Response No. 89(b) above.

Responding Witness: Ryan Turner

Request No. 90:

Provide how many residential neighborhoods exist within 2000 ft of the Project.

Response:

There are seven residential neighborhoods located within 2,000 feet of the Project.

Responding Witness: Ryan Turner

Request No. 91:

Describe the hazard detection systems, such as smoke and heat detectors, as well as gas meters, that will be used within the BESS facility.

Response:

Ultimately, the features and systems for BESS facilities will be vendor-specific and contained within the BESS model's specification sheets. However, any BESS facility will be designed per NFPA 855, UL 9540/9540A, IEEE 1578, and the Kentucky Building/Fire Codes. Each anticipated enclosure is designed in adherence to these regulations and manufacturer specifications, and typically includes: BMS monitoring, gas detection with automatic shutdown, HVAC, fire control, electrolyte containment, and an SPCC plan, all monitored 24/7 via SCADA with remote annunciation to offsite Operations & Maintenance (O&M) personnel.

Responding Witness: Jacqui Kitchen

Request No. 92:

Describe alert systems that will be in place at the BESS facility and who will monitor and maintain those systems. Include in the explanation whether the systems provide remote alerts and annunciation to offsite personnel and the fire department.

Response:

See Response No. 91 above.

Responding Witness: Jacqui Kitchen

Request No. 93:

Describe how the BESS facility will be designed to prevent thermal runaway. Include ventilation and air conditioning (HVAC) systems that will be used.

Response:

See Response No. 91 above.

Responding Witness: Jacqui Kitchen

Request No. 94:

Describe the fire suppression systems that will be installed at the BESS facility. Include in the response the standards those systems will have to meet, who will monitor and maintain those systems.

Response:

See Response No. 91.

Responding Witness: Jacqui Kitchen

Request No. 95:

Explain how the BESS facility will comply with IEEE 1578 standards in relation to electrolyte spills.

Response:

See Response No. 91.

Responding Witness: Jacqui Kitchen

Request No. 96:

Explain whether the BESS facility be designed to withstand environmental hazards that may arise within the area.

Response:

See Response No. 91.

Responding Witness: Jacqui Kitchen

Request No. 97:

Provide a photo or visual rendering of the perimeter fencing.

Response:

See Response No. 52.

Responding Witness: Jacqui Kitchen

Request No. 98:

Provide the total linear footage of fence line that will secure the site.

Response:

Approximately 161,278 linear feet of fencing will secure the site.

Responding Witness: Ryan Turner

Request No. 99:

Provide how many linear feet of collection system cables will be installed throughout the project.

Response:

The Project currently estimates 111,361 linear feet of MV cable, and the final number of linear feet will be determined upon final site design.

Responding Witness: Ryan Turner

Request No. 100:

Provide any interconnection studies for the project.

Response:

Please refer to Application Exhibit F.

Responding Witness: Jacqui Kitchen

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Request No. 101:

Provide a Fire Prevention and Management Plan for the project.

Response:

This will be prepared by the Project's EPC prior to the commencement of construction.

Responding Witness: Jacqui Kitchen

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Request No. 102:

Provide any geotechnical desktop studies for the project.

Response:

Please find the requested study attached separately due to file size limits.

Responding Witness: Ryan Turner

Request No. 103:

Provide a stream and wetland delineation study for the project.

Response:

The requested study is attached to Response No. 83.

Responding Witness: Bob Roy

Request No. 104:

Explain whether the site layout plan will be modified based on the Wetland Delineations Study.

Response:

The current site layout plan is already designed based on the Wetland Delineations Study.

Responding Witness: Bob Roy

Request No. 105:

Provide a Phase I Environmental Site Assessment for the project.

Response:

The requested study is attached to Response No. 83.

Responding Witness: Bob Roy

MYSO, LLC
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Request No. 106:

Provide a Wildlife Concerns Analysis for the project.

Response:

Please find the requested document attached separately due to file size limits.

Responding Witness: Bob Roy

Request No. 107:

Provide any Bat Mist Net Surveys for the project.

Response:

None have been completed at this time.

Responding Witness: Bob Roy