

May 16, 2022

RECEIVED

MAY 18 2022

PUBLIC SERVICE
COMMISSION

Kentucky State Sitting Board on Electric Generation and Transmission Sitting

P.O. Box 615

211 Sower Boulevard

Frankfort, Kentucky 40602-0615

Notice of Filing of Draft Environmental Assessment

Case Number 2021-00235

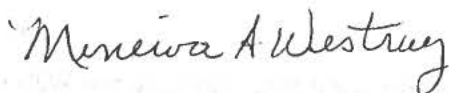
Please find the following in response to a Notice of Filing of a Draft Environmental Assessment posted to the case file dated 05/12/2022, from Russellville Solar regarding the above referenced Case File Number 2021-00235. This response is from the Vick Family Trust.

It is with great regret that with no public hearing has taken place on this project and with no approvals for this project in Logan County that work is well underway on this very dangerous project. It is even more disturbing that with such a talent of workforce in Logan County and Kentucky to complete the current services under construction presently on the project, that Russellville Solar has chosen to employ out of state contractors to effectively destroy prime farm cropland in Logan County, Kentucky.

Please find attached the response from the Vick Family Trust as dated April 06, 2022, and submitted to the Tennessee Valley Authority regarding this Environmental Assessment for the project.

We truly thank you for your time, attention, and for giving us a voice in this very risky proposed project.

Respectfully Submitted,



Minerva A. Westray

Vick Family Trust

April 06, 2022

Elizabeth Smith

NEPA Specialist

Tennessee Valley Authority

400 Summit Hill Drive, WT 11B

Knoxville, Tennessee 37902

Regard: Logan County Solar Project-Russellville Solar Environment Assessment and Appendices

Please find the following in response to a request from the Tennessee Valley Authority requesting public input concerning the proposed construction of a solar facility in Logan County, Kentucky. The following concerns and comments are from the Vick Family Trust. The Vick Family Trust owns and operates a 120 acre tract directly adjacent to and completely bound on the western and southern sides of the property by the proposed solar development. The Vick Family Trust includes nine Logan County residence families directly affected by this proposed facility. The Vick Family Trust will strongly employ the Tennessee Valley Authority to issue a No Action Alternative to all sections of this project and to the project in whole as outlined in Chapter 2.1 of the Environmental Assessment. Below we will begin to describe our comments and concerns of this proposed project.

We will begin by saying that several of our concerns are unique to the effects on the current and successful farm cropping operations of the Vick Family Trust property and move into our concerns and comments for this farming community Logan County, Kentucky, and indeed the United States of America requesting a No Action Alternative to this proposed project.

In Chapter 1.3 of the Environmental Assessment, Russellville Solar asserts that it held two public meetings concerning this project. We do not believe that this is the case, and if indeed public meetings were held, why were not the minutes, comments, and concerns of these public meetings placed in the submitted Environmental Assessment report. Russellville Solar did hold two promotional informational meetings by invitation. The first by a Russellville Solar represented that shortly afterwards left Russellville Solar with the second meeting conducted by a different new representative of Russellville Solar. The Logan County Fiscal Court County Judge Executive also acknowledged that at this point in the process that had not been any public meeting in Logan County on this project.

Only recently has the Kentucky Public Service Commission opened a formal public comment and question format concerning this proposed project. As outlined by the Order Issued by the Kentucky State Board on Electric Generation and Transmission siting in Case Number 2021-00235 Dated March 17, 2022, we are currently in the First Request for Information to Russellville Solar, LLC, phase of this comment period. The first public hearing on this proposed project is scheduled for June 30, 2022, before the Kentucky Public Service Commission in Frankfort, Kentucky. As to date, Russellville Solar has

not responded to any question from the Vick Family Trust concerning this proposed project as per a written and filed letter to the Kentucky Public Service Commission dated March 19, 2022. In addition, with several Logan County Fiscal Court members announcing that this project is a 100 percent go with no oversight or public comment period, the Vick Family Trust truly thanks the Kentucky Public Service Commission and the Tennessee Valley Authority for this voice of our comments and concerns in this very destructive project to the health and economy of Logan County, Kentucky. With the Logan County Fiscal Court now authorizing private out of court meetings with Russellville Solar and the continued closed door executive sessions occurring, the tax paying citizens of Logan County truly appreciated this public comment and concern format to allow the long-standing prime cropland farming community in Logan County to have a voice in this very risky project. With this lack of community balance to this proposed project, we would request the Tennessee Valley Authority to issue a No Action Alternative to this proposed project.

As per Chapter 2.4 of the Environmental Assessment addressing Analysis of Impact based on the potential future conditions of the properties and the surrounding project area, the Vick Family Trust would like to address the current and future access easement to the crop farming operations of the Trust. The only access to the crop farming operations of the Vick Family Trust is along the one-way county roadway of A.P. Miller Road and onto the current access roadway easement. Another crop farming property is also in use of this same access roadway to successfully farm their property. The current access easement goes completely across the proposed solar development area landlocking the Vick Family Trust from access by farming equipment to our property. Indeed, the other property owner becomes landlocked by this proposed project also. The Vick Family Trust has requested that Russellville Solar provide a specific and detailed plan on how it proposes to allow at least a fifty-foot full time access easement to the Vick Family Trust property to insure our continued successful crop farming operation. Russellville Solar has not responded to our request concerning this access easement. The Vick Family Trust property is bound completely on the western and southern side by this proposed development and is directly impacted by this solar operation. Because of this potential ability to landlock current farming operation cropland, the Vick Family Trust would request the Tennessee Valley Authority issue a No Action Alternative to this proposed project. Landlocking or even temporarily denying access to this successful crop farming operation would put an end to the revenue generated from this farming operation directly and greatly affecting the economic conditions of the members of the Vick Family Trust.

Remaining on the Analysis of Impact based on the potential future conditions of the properties and the surrounding area, the Vick Family Trust would like to express our concerns and comments of taking thousands of acres of prime crop farmland out of production now and potentially forever. An easy argument could be made that current crop grain farming operations are as important to the fuel and energy needs of our nation as the proposed solar panels not even mentioning the life sustaining food grown on this prime farmland every year. Grains produced on this prime farmland in America are used daily in fuel production fueling our cars and equipment energy needs. More and more the life sustaining food produced on this prime rich farmland in Logan County and America is feeding the nation and world. There are many alternative locations throughout Logan County to facilitate constructing this proposed solar farm. To take thousands of prime farmlands used for food and energy sources out of production now and potentially forever seems very wrong for Logan County and the future needs of the United States of America. The economic loss to Logan County by taking this prime cropland out of production is

huge. The loss of payroll to work the land, the purchase of equipment to farm the land, the purchase of fertilizer to enrich the land, the purchase of fuels to run the equipment, the trucks to take the grain to market, the storage facilities to process the grain, and the loss of tax base to Logan County from the Industrial Revenue Tax Exempt Bonds to name a few creates a major economic loss to Logan County from the direct construction of this project on prime farmland. With many other viable locations for this solar farm construction in Logan County, this proposed project simply creates too much of an economic loss to Logan County and a loss to our nation to allow this construction on prime farmland in Logan County, Kentucky. We would again ask for an issue of No Action Alternative.

Concerning Chapter 1 of the Environmental Assessment involving need for action, no power generated from this proposed solar project would affect Logan County in any way. The farmland put out of production would generate power to be used in other counties and other states. On several public occasions Russellville Solar has announced the power generated from this proposed project would be used to help publicly traded companies of General Motors and Facebook with no power being given to Logan County. General Motors is in Warren County, Kentucky, north of Bowling Green and Facebook is located in Sumner County, Tennessee. Given this fact, we see no need for action of this project in Logan County to take prime farmland out of production when there are thousands of viable solar farm sites near these out of county and out of state publicly traded companies. We feel the Tennessee Valley Authority should request sites much closer to the user point of the generated energy to create a need for action.

Along the entire western boundary of the Vick Family Trust property there is an existing berm and wooded tree line protecting our property and insuring a successful cropping operation. As the Environmental Assessment notes from the map on page 55, Figure 3-6, there are numerous identified Wet Land Areas, Ponds, and Streams directly along this western property line boundary of the Vick Family Trust on the proposed solar farm property. The Vick Family Trust has requested from Russellville Solar a specific and detail plan on how Russellville Solar will both protect this existing and critical berm and tree line area during and after construction; and how will Russellville Solar contain, monitor, and control the surface and ground water runoff both during and after construction of this proposed solar farm facility. Russellville Solar has not provided either a specific or detail plan concerning these issues in a Best Management Practices Plan outlining the steps to address these issues.

While reviewing Table 2-1 of the Environmental Assessment, it can clearly be seen that all criteria for these categories of Land Use, Geology, Soil, and Prime Farmland, Water Resources, Biological Resources, Visual Resources, Noise, Air Quality and GHS Emissions, Culture Resources, Utilities, Waste Management, Public and Occupational Health and Safety, Transportation, Socioeconomics, and Environmental Justice all fall into the category of Impacts from No Action Alternative. We would hereby request the Tennessee Valley Authority issue a No Action Alternative for the entire project based on these criteria.

The Environmental Assessment list in Table 1-1, the Permits and Approvals List needed on this project; however, the permits themselves or the approval of these requested permits do not appear in this Environmental Assessment. There is no mention in this Environment Assessment of how this construction on solar farm operation will affect the numerous homes and people living in those homes for the next 20 years from all the dangers surrounding a solar farm operation. There is no mention in this Environmental Assessment of how severely adjacent property land values will decrease from this

proposed project and what compensation will be given to the adjacent property owners from this loss due to this direct solar farm facility. There is no mention in the Environment Assessment of the dangerous elements and chemicals located in these solar panels and their direct impact on the people and wildlife living very close to this proposed solar farm facility. There is simply no mention of the dangers this facility poses to the prime farmland in Logan County from this proposed solar farm operation in the Environmental Assessment.

Regarding page 149 of the Environmental Assessment, there is contained a report prepared for Community Energy Solar, LLC, three years ago on July 21, 2019. The request for the Logan County Solar Project is from Russellville Solar, LLC. This report should be removed from the Environmental Assessment on this proposed project. These numerous shell changes, name changes, personnel changes, and address changes all show that Russellville Solar, LLC, does not have the ability or understanding to construct a successful project on this sensitive and very delicate prime Pembroke crop farmland in Logan County. In addition, the Environmental Assessment does not address the protection and access to the existing and functioning modern cemetery in the middle of this proposed solar farm development. These factors show a No Action Alternative is required for this proposed dangerous project.

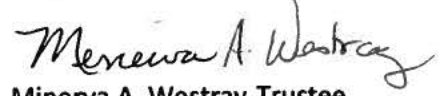
Everyone in Logan County knows this proposed solar farm site is one of the richest archaeological areas in Logan County. Some land has been taken out of the proposed site area due to archaeological evidence and some adjacent land has been rejected due to archaeological concerns and evidence. On page 202 of the Environmental Assessment the Cherokee Nation addresses this issue noting "Tennessee Valley Authority halt all project activities immediately", if further archaeological cultural artifacts are uncovered during this proposed construction. The archaeological risk coupled with the existing functioning cemetery in the middle of this proposed site should give pause to the construction of this project. Simply this is the wrong site in Logan County for this proposed project. The inhabited residence occupied home on the Vick Family Trust property is not even listed in Table 3-16 of the Environmental Assessment. These issues show a No Action Alternative is in order.

The Environmental Assessment completely ignores the health, safety, and management of the huge sheep flock required for maintenance of this proposed solar site. The direct affect to the protection and management of the huge wildlife population is not properly addressed in this Environmental Assessment. The protection of this proposed massive solar farm facility from numerous wildlife hunting activities in this area is not addressed in the Environmental Assessment. The general maintenance and liability resulting from wind, storm, or any damages from these solar panel to adjacent landowners is not addressed in the Environmental Assessment. The absence of these general issues clearly show that Russellville Solar is not aware or capable of properly constructing and maintaining for 20 years or more this proposed \$ 200 million dollar solar operation on the most valuable prime farmland in the United States of America and on one of the most sensitive environments in this country. If there has ever been a site for a No Action Alternative, this is the property and the submission of this Environmental Assessment bears this out.

We truly appreciate the services of the Tennessee Valley Authority to our community and this country. We thank you for the ability to publicly voice our concerns and comments on this proposed project. Given these conditions, we employ the Tennessee Valley Authority to issue a No Action Alternative to

this entire project and protect the value to our nation created by this sensitive and rich crop prime farmland in Logan County, Kentucky.

Respectfully Submitted,

A handwritten signature in black ink that reads "Minerva A. Westray". The signature is written in a cursive style with a large, prominent initial "M".

Minerva A. Westray-Trustee

Vick Family Trust