



Andy Beshear
Governor

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Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
**Kentucky State Board on
Electric Generation and
Transmission Siting**
211 Sower Blvd.
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August 12, 2024

PARTIES OF RECORD

Re: CASE NO. 2024-00105

Notice is given to all parties that the attached Pike County Solar site visit questions has been filed into the record of this proceeding.

If you have any comments you would like to make regarding the contents of the document, please do so within five days of receipt of this letter. If you have any questions, please contact Nicole Carr, at Nicole.Carr@ky.gov.

Sincerely,

A handwritten signature in blue ink that reads "Linda C. Bridwell".

Linda C. Bridwell, PE
Executive Director
On Behalf of the Siting Board

Attachment

Pike County KSB Site Visit – July 30, 2024

Pre-Site Visit Questions:

- How many parcels are within panel area?
 - There are currently 8 parcels within panel area
- Transmission Area Discussion:
 - The project has an Interconnection Service Agreement with PJM and AEP.
 - There are discussions in process to obtain easement agreements for the transmission line. Two easements have been secured, three are outstanding.
 - The transmission line was not included as part of this application as it will be required to obtain a Certificate of Public Convenience and Necessity due to the length and size of the line under separate application.
- Asked about last instance of mining activity on the site
 - Landowner noted it was 7 years ago in which the company walked away from the Site. The last mining in the area was in 2017, however the last mining on this property was in 2011. EEC has revoked the mining bonds.
- Traffic: Asked about average and peak number of workers at the site
 - Approximately 100 passenger vehicles per day associated with traffic is expected during construction.
- Traffic: Asked about average and peak number of trucks at the site
 - Peak number of tractor trailer trucks at the Site is estimated to be 10 per day with an average of 5-10 per day during construction
 - Carpooling?
 - Some carpooling may be expected but 100 passenger vehicles per day is estimated for the site during construction.
 - Ratio of trips to (more than TWICE what normally see – need documentation if that is correct. Do we need to modify? 100 trips to 328 workers suggests LOT carpooling)
 - From Traffic Report – During construction, the expected vehicle traffic is approximately 100 pickup trucks and passenger cars and 5 to 10 tractor trailer trucks per day. Therefore, this analysis will assume 10 tractor trailer trucks per day. The Economic Report estimates that there will be a total of 328 new jobs (240 direct plus 88 indirect jobs) in Pike County in year one. There will be 240 direct jobs on site over the 18 month construction period, and we expect 100 cars and workers per day.
 - Is the difference average versus peak?
 - See above comment.
 - Clarify ALL roads that may have heavy loads (inc module delivery – not just oversized).

We would expect all semi-trucks to utilize US 119 to access the site for both heavy and oversized loads. This is also based on the understanding that the site will have direct access to US 119.

- Do we have all closer residences, even if not in neighborhoods, in chart? Exhibit B to Motion for Deviation does NOT include residences not in neighborhood. Prep updated version that shows ALL residences in 2,000 foot radius even if not in neighborhood. SLS/Justin.
 - Added all structures within 2,000 feet to the updated figure calculations included in submission.
- Glare Study: Asked about screening and the use of existing vegetation
 - Existing vegetation will be used as screening to the extent possible. Additional vegetation will be used if necessary to minimize impacts from glare if existing grade and vegetation are not adequate.
- Viewshed: Wanted to add all residences within 2,000 feet
 - Added residences within 2,000 feet with the updated map. Additionally added a 2,000 foot buffer to the map as well.
- Viewshed: Color code the identified 14 residences with a view of the Project
 - Added color coded symbology for the 14 residences with a view of the project components with the updated map. 8 identified residences have a view of the proposed array and 6 have a view of the proposed fence, based on spatial review.
- How big an issue are mudslides or drainage issues on site?
 - Landowner stated mudslides have not historically been an issue. Stormwater management plans and reclamation typically improve site conditions and drainage on site.
- Coordination with FAA

- Communicate and coordinate with airport. Notice Criteria Tool requires to file, will coordinate with FAA as necessary.

* Structure Type: SOLAR | Solar Panel

Please select structure type and complete location point information.

Latitude: 37 Deg 34 M 40.17 S N

Longitude: 82 Deg 25 M 44.91 S W

Horizontal Datum: NAD83

Site Elevation (SE): 27473 (nearest foot)

Structure Height : 10 (nearest foot)

Is structure on airport: No Yes

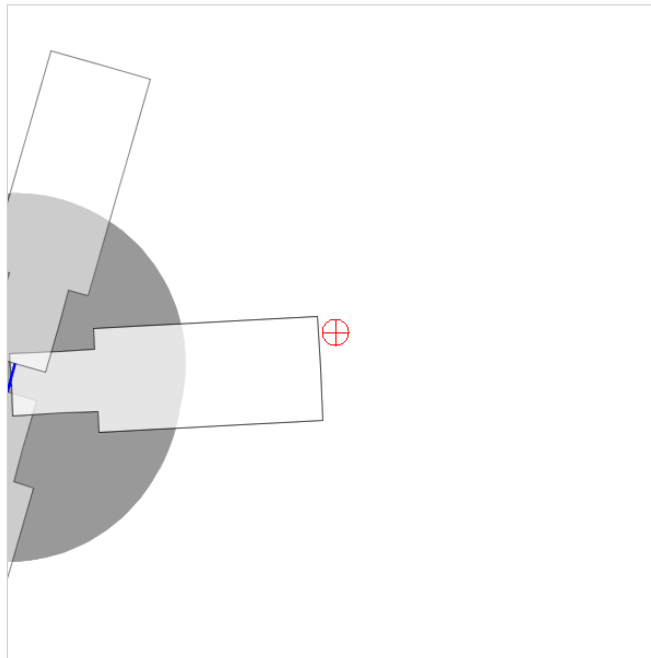
Submit

Results

You exceed the following Notice Criteria:

Your proposed structure is in proximity to a navigation facility and may impact the assurance of navigation signal reception. The FAA, in accordance with 77.9, requests that you file.

The FAA requests that you file



- Asked about the 387 acres of vegetation removal noted in application
 - Site Studies have note been completed. The acreage is aerial based, which includes scrub trees and grasses, no hardwoods. Most appear to be invasive species including autumn olive trees and sericea lespedeza, which were historically planted on reclamation sites because they establish and re-seed quickly.
- Will there be road / bridge improvements?
 - We do not anticipate the need to update public roads. Private will likely need some improvements, however a haul route study will be completed to confirm any necessary improvements.
- What is peak truck delivery?
 - Peak truck delivery will be during module delivery. We anticipate the delivery of First solar panels and estimate 10 pallets per truck, and 41 modules per pallet which equates to 19 trucks a day for approximately a 6 week period. During this time additional deliveries may be made resulting in peek truck delivery to be approximately 20-30 truck per day for that short period.

Site Visit:

- Concerns about road (Bent Branch Road, Brushy Road) to haul transformers; concerns about its curvy nature
 - Savion is still determining alternative routes, haul route study to be completed before finalization of access roads.
- Asked about improving the road off of Brushy Road near the existing water tower
 - Savion will improve if necessary to the extent practicable.
- Asked about alternative construction entrance off of Ford Mountain Road
 - Savion noted this was more favorable, haul route study will be completed to finalize access and delivery roads. Ford Mountain Road will be the main delivery and access point to the site.
- Asked about substation location and had concerns regarding the slope of proposed location
 - Savion noted that the location could be moved due to slope and that a 4-5 acre area is the general area subject to alteration. A small area near the substation of about an acre is reserved for an Operations and Maintenance building (typical building size 30'Wx40'Lx15'H) and associated parking.
- Asked about the instillation of a weather station
 - Savion noted they plan to install approximately four across the site. Location to be determined once design is finalized.
- Asked about plans for leftover mining equipment on site
 - Savion noted that landowner and/or contractor will haul it away. It will likely be a requirement of the state to remove and dispose of leftover mining equipment, however, if not, Savion will work with landowner to develop a plan to remove from the site.
- Asked about grading/steep slopes and the Project plans to accommodate
 - The site has yet to be restored, and some grading might happen during site restoration, which is outside the scope of this permit. Savion plans to utilize racking technology to accommodate the steeper slopes and only minor areas will be graded for project construction.
- Asked about piling plans
 - Savion plans to utilize a special procedure, previously utilized on the Martin project, which involves drilling and backfilling with sand, prior to driving piles.
- Asked about location of water/laydown area
 - The plan is to be located in the central Project Area but will be determined after field studies. Typical to have one larger laydown area (central to the site) with smaller staging areas across the site near individual panel areas.
- Asked about mining decommissioning plan and plans for reclamation

- Noted that they plan on utilizing a conversion plan of the land use and the mining decommissioning is included with the 90 day timeframe. KSB noted that this method is favorable for former mines across the state.
 - Current Post Mining Land Use Reclamation Plan: Before the site was mined a post mining land use was submitted and approved to the state. This would include re-constructing the original contours to the site, and re-planting the site with appropriate vegetation. This process can take from 12-18 months to complete.
 - PMLU Amendment to C&I: In partnership with the landowner and the surety company, the project intends to submit a new Post Mining Land Use Plan to the state as a request to change the post mining land use to Commercial & Industrial Use. This will allow for solar to be built as a post-mining land use. Any changes to the plan are required to be approved by the state. This process could take as little as 90 days to complete.
 - Project decommissioning plan: Decommissioning of a solar project and it's equipment after its operational life is anticipated to take up to 18 months. (KRS) 278.706(2)(m) requires that decommissioning activities be completed within 18 months of the Project ceasing to produce electricity for sale unless the deadline has been extended by the Secretary of the Kentucky Energy and Environment Cabinet ("EEC"). Monitoring and site restoration may extend beyond this period to ensure successful revegetation and rehabilitation.
- Asked about mapped streams and their location
 - Observed as non-existent. Savion and ERM noted that the site will be ground-truthed for aquatic features.
- Asked about land access/negotiations
 - Savion has access and control of all land within the Project area and will negotiate if land outside of the Project area is necessary.
- Asked about flat areas without plans for panels
 - Savion noted that they would potentially considered updating the site plans to locate panels on these areas based on forthcoming studies. Site plan continues to be updated.
- Asked about the type of landfill near Ford Mountain Road
 - Savion noted it contains municipal waste, non-hazardous
- Asked about biggest concerns for the public meeting
 - Savion noted it was regarding parcel boundary disputes
- Asked about plans for glare along Ford Mountain Road identified in Glare Study; asked about the use of a vegetative buffer.
 - Savion and ERM noted that glare study does not account for elevation or existing vegetation and may have skewed results based on this. Vegetative buffer will be incorporated if necessary.

- Asked about traffic plans by the school
 - Savion will utilize flaggers and escort vehicles. Will coordinate with school regarding schedule
- Asked ERM regarding elevation/neighborhood map; wants more reference elevation points and key areas called out
 - ERM has provided an updated map with additional reference elevations, elevations on all transformers/inverters, substation area, and key locations and also included additional residences within 2,000 feet.
- Asked about cemeteries southern adjacent to project area and viewshed issues
 - Savion noted that elevation difference should create natural viewshed buffer.
- How many panels would there be (PSC)?
 - There will be approximately 191,436 ground-mounted photovoltaic (PV) modules.
- Do we have a PPA sign yet (PSC)?
 - There is no PPA for this project.
- Project COD (PSC)?
 - Project COD is Q4 2027

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