

March 17, 2021

Cheryl Newton, Acting Regional Administrator
US EPA Region 5
Office of the Regional Administrator
77 W. Jackson Blvd.
Chicago, IL 60604-3590

RE: Request for Comments on Posey Solar Project in Posey County, Indiana

Dear Cheryl Newton:

Tetra Tech Inc., on behalf of Posey Solar LLC (Posey Solar), is gathering information and requesting agency comments for the proposed Posey Solar Project (Project) in southeast Posey County, Indiana. The purpose of this letter is to inform your organization of the proposed Project as required by Posey County ordinance Development Plan Application, seek your input regarding any permits or approvals that may be required, and identify known resources under your agency's jurisdiction that may be in the study area (herein described) or surrounding vicinity that could be materially affected.

The Project has a proposed nameplate energy generation capacity of up to 300 megawatts (MW) alternating current (AC). An area of approximately 8,300 acres is being evaluated for siting the Project (Study Area). The design of the Project is still being finalized, and the cumulative footprint of the Project is estimated to be approximately 2,400 acres (Project Area) within the Study Area. The Project is located east of the city of Mt. Vernon and west of the city of Evansville. A map of the Study Area location and boundary is enclosed for your reference (**Figure 1**).

Land use within the Project Area is currently row-crop agriculture.

The Project's facilities may include:

- Solar modules, inverters, and racking;
- Fencing;
- Access roads;
- Operations and Maintenance (O&M) building;
- Project substation;
- Power transformer;
- Transmission line;
- On-site electrical collection lines; and
- Ancillary equipment or buildings as necessary.

The proposed Project solar array layout and other facilities' locations have not been finalized at this time. Foundations for the solar arrays will be driven steel piles. Fencing will consist of an appropriately sized fence and material. Gates will be secured with lock boxes. Access will be controlled by the Project owner with access provided to local emergency response officials as needed. Access roads will be installed as necessary to allow access to Project facilities for O&M of the Project. Road design includes stripping the surface vegetation root

zone for the width of the road and placing compacted aggregate over the stabilized subgrade. Mechanical stabilization, such as geotextile reinforcement, may also be employed on top of compacted subgrade before aggregate placement. The electrical collection lines between the solar arrays, inverters and Project's substation will be 34.5 kilovolt (kV) and may be installed aboveground or direct buried at a reasonable and standard industry practice depth. Directional boring may be used to install collectors at some portions of the Project. The Point of Interconnection (POI) will be a new switching station that connects to the existing AB Brown-Gibson 345kV transmission line. The new switching station is planned to be located on the east side of the Project Area approximately 1.5 miles north of the AB Brown 345kV substation, and approximately 36.5 miles south of the Gibson 345kV substation.

We respectfully request your response comments within 30 days of receipt of this letter. Where applicable, written agency comments provided in response to this letter will be incorporated into the Development Plan Application materials that will be submitted to officials in Posey County.

If you require further information or have questions regarding this matter, please contact me at 612-643-2237 or at adam.holven@tetrattech.com.

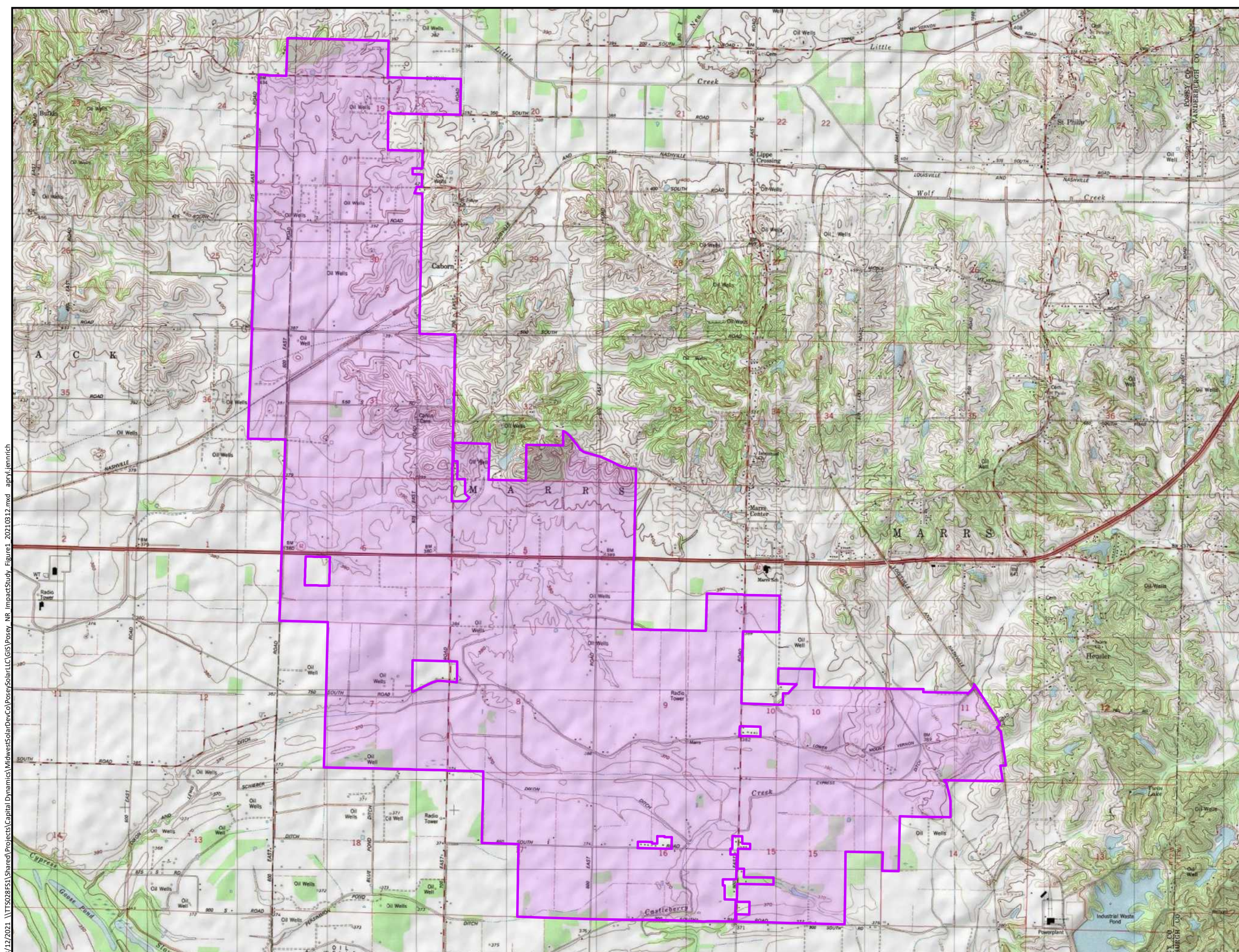
Sincerely,




Adam Holven
Project Manager
Tetra Tech Inc.
2001 Killebrew Drive, Suite 141
Bloomington, Minnesota 55425

Enclosure: Figure 1 - Posey Solar Project Location

3/12/2021 \\TTS028FS1\Shared\Projects\Capital Dynamics\MidwestSolar\DevCo\PoseySolar\LCG\GIS\Posey_NR_ImpactStudy_Figure1_20210312.mxd apryl.jennrich



 Study Area (8,274 acres)

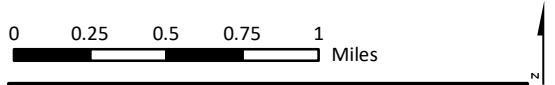


Figure 1: Project Location
Posey Solar LLC
Posey County, Indiana

Source: Map adapted from ArcGIS USA Topo Map Server; Study Area data provided by Posey Solar LLC (03/9/2021); Scale Scale: 1:40,000.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

March 23, 2021

REPLY TO THE ATTENTION OF:

Mail Code RM-19J

Adam Holven
Project Manager
Tetra Tech, Inc.
2001 Killebrew Drive, Suite 141
Bloomington, Minnesota 55425

Dear Mr. Holven:

Thank you for your March 17, 2021 letter to Acting Regional Administrator Cheryl Newton. In your letter, you requested information and comments from the Environmental Protection Agency on the proposed Posey Solar Project in Posey County, Indiana.

We recommend accessing the following websites to obtain pertinent information on the existing project environment and potential project impacts.

- NEPAAssist is a free EPA web-based analytical tool that allows users to access geospatial environmental data for user-defined locations (<https://www.epa.gov/nepa/nepassist>).
- The Watershed Assessment, Tracking & Environmental Results System provides additional information about the quality of the nation's surface water (<https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>).
- The U.S. Global Change Research Program's National Climate Assessment has information on potential impacts to infrastructure in the Midwest caused by the increasing severity and frequency of major storm events. Future changes to the integrity of infrastructure could alter the environmental impacts of the proposed project over the life of the license. Information on adaptation is available at EPA's Climate Adaption Resource Center (<https://www.globalchange.gov/browse/reports> and <https://www.epa.gov/arc-x>).

Should this project involve actions, such as processing an application for federal funding, by a federal agency that would trigger that the need to comply with the National Environmental Policy Act (NEPA), my office would appreciate notice of availability of any NEPA documents that may be produced by the federal agency to inform its decision.

If this project will involve the dredging or filling of Waters of the United States, such as jurisdiction wetlands and/or streams, it may require a permit from the US Army Corps of Engineers Louisville District under Section 404 of the Clean Water Act. For additional information on the CWA Section 404 or to apply for a permit, you may contact the Louisville District Regulatory Office at 502-315-6733 or visit their website (<https://www.lrl.usace.army.mil/Missions/Regulatory/>).

If you have further questions about NEPA, please contact me at westlake.kenneth@epa.gov and 312-886-2910. Questions regarding Section 404 of the Clean Water Act should be directed to Melanie Burdick at burdick.melanie@epa.gov and 312-886-2255.

Sincerely,

Kenneth A. Westlake
Deputy Director, Office of Tribal and Multimedia Programs
Office of the Regional Administrator

From: Westlake, Kenneth <westlake.kenneth@epa.gov>
Sent on: Tuesday, March 23, 2021 10:11:22 PM
To: Holven, Adam <adam.holven@tetrattech.com>
CC: Burdick, Melanie <Burdick.Melanie@epa.gov>
Subject: Posey Solar Project Request for Comments
Attachments: Posey Solar Introduction Letter_EPA.pdf (765.02 KB), Posey Solar Project response to Tetra Tech 3-23-21.pdf (237.35 KB)

⚠ **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. ⚠

Mr. Holven, attached is EPA's reply to your recent letter. Thanks.
Ken Westlake

Kenneth A. Westlake
Deputy Director, Tribal and Multimedia Programs Office
Office of the Regional Administrator
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604
westlake.kenneth@epa.gov
312-886-2910

From: Holven, Adam <adam.holven@tetrattech.com>
Sent: Wednesday, March 17, 2021 4:05 PM
To: Newton, Cheryl <Newton.Cheryl@epa.gov>
Cc: Joshua Chavez <JChavez@arevonenergy.com>; Finocchiaro, Joseph <jfinocchiaro@TENASKA.com>
Subject: Posey Solar Project Request for Comments

Dear Cheryl Newton,

Tetra Tech Inc., on behalf of Posey Solar LLC, is gathering information and requesting comments for the proposed Posey Solar Project in Posey County, Indiana. Please see the attached letter and map for additional information. Please direct all questions and comments to:

Adam Holven, Project Manager

Tetra Tech Inc.
2001 Killebrew Drive, Suite 141
Bloomington, MN 55425
adam.holven@tetrattech.com
612-643-2237

Thank you!

Adam C. Holven | Senior Archaeologist/Project Manager
Direct: 612.643.2237 | Main: 612.643.2200 | Fax: 612.643.2201
adam.holven@tetrattech.com