Exhibit E to Application

Blair Wade Testimony

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STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
Docket No. 2022-____-E
Docket No. 2022-____-E

In the Matter of: Application of SR Lambert I, LLC for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 100 MW Solar Facility in Georgetown County, South Carolina Pursuant to S.C. Code Ann. § 58-33-10 et. seq., and Request to Proceed with Initial Construction Work, S.C. Code Ann. § 58-33-110(7).	)
In the Matter of: Application of SR Lambert II, LLC for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 100 MW Solar Facility in Georgetown County, South Carolina Pursuant to S.C. Code Ann. § 58-33-10 et. seq., and Request to Proceed with Initial Construction Work, S.C. Code Ann. § 58-33-110(7).	)

PRE-FILED DIRECT TESTIMONY OF BLAIR WADE ON BEHALF OF SR LAMBERT I, LLC AND LAMBERT II, LLC

March 2, 2022

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Introduction and Qualifications

Q. Please state your name, your position and your business address.

A. My name is Blair Wade. My business address is 4400 Leeds Avenue, Suite 450, North Charleston, South Carolina. I am the Southeast Regional Renewables Lead and a Senior Environmental Project Manager for HDR Engineering, Inc. ("HDR"). I and HDR have been engaged to provide environmental services for the proposed SR Lambert I, LLC ("Lambert I") and SR Lambert II, LLC ("Lambert II") solar projects (collectively, the "Projects") being planned and proposed for Georgetown County, South Carolina.

Q. Have you previously provided testimony to the South Carolina Public Service Commission?

A. No, I have not.

Q. On whose behalf are you providing testimony?

A. I am providing testimony on behalf of applicants Lambert I and Lambert II (together, the "Applicants") and their parent company Silicon Ranch Corporation ("Silicon Ranch").

Q. Please describe your educational background and professional experience?

A. I have a Bachelor of Science degree from James Madison University and a Master of Environmental Management degree from Duke University, and 18 years of experience in environmental permitting and natural resources planning. In particular, my environmental planning practice has an emphasis on working with renewable energy projects throughout the Southeast.

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A copy of my *curriculum vitae* will be provided as a supplement my testimony and labeled as **Exhibit 1**.

Q. What is the purpose of your testimony in this Proceeding?

A. Lambert I and Lambert II are applying for certificates of environmental compatibility and public convenience and necessity ("CECPCN") for two solar photovoltaic ("PV") energy projects. Pursuant to the requirements of the CECPCN statute, my testimony will summarize what studies have been undertaken by the applicants for the Projects, describe the nature of expected environmental impacts, and provide an update on the status of required consultation or permits with environmental agencies. Based on that information, my testimony will show that, in my opinion, the applications for environmental permits are complete and agency coordination is ongoing to promote timely issuance of permits for the Projects.

Q. As it relates to your testimony, please describe the Projects and their location.

A. The Lambert I and Lambert II sites (the "Project Area") encompass 2,082 acres in unincorporated Georgetown County, South Carolina, located south of the town of Andrews and east of the unincorporated Lambert area. The proposal is to develop two 100 MW PV solar power generating facilities. The Project sites are currently owned by Resource Management Service Timber Company, with which Silicon Ranch has an option agreement to explore and develop the solar facilities. Based on historic aerial imagery and US Geological Survey topographic maps, the Project Area has been in silviculture for over fifty years. Vegetation, hydrology, and soil have been previously and significantly

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disturbed. The Project Area is predominantly planted in loblolly pine; however, the site is under active silviculture and large portions of the site have been timbered. A network of ditches is present on the site that have altered hydrology. Soils have been disturbed by bedding.

Q. Please identify and describe any studies that have been conducted to understand what if any environmental impacts of the Projects.

A. To date, the Applicants, with the assistance of HDR, have performed the environmental assessments, studies, or analyses set forth in the Projects' Permit Matrix, attached hereto to the Applications as **Exhibit H** and, for ease of reference, to my testimony as **Exhibit 2**. Among the environmental analyses and documents prepared, they include:

- Critical Issues Analysis (August 2019)(**Exhibit 3**)
- Phase I Environmental Assessment (July 27, 2020)(**Exhibit 4**)
- Cultural Resources Assessment (August 31, 2021)(**Exhibit 5**)
- US Fish & Wildlife - Federal Listed Species Effect Letter (December 9, 2021)(**Exhibit 6**)
- Federal Listed Species Effects Memorandum (December 8, 2021)(**Exhibit 7**)
- SC Dept. of Natural Resources – Species Effects (correspondence of January 4, 2022)(**Exhibit 8)**
- Pre-Filing Request (September 21, 2021)
- Wetlands Delineation

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- Clean Water Act Section 404 Joint Permit Application and Section 401 Water Quality Certification Request (December 20, 2021)
- Coastal Zone Consistency Certification Request (December 20, 2021)

Q. Please identify the environmental permits and approvals you anticipate will be necessary for the Projects.

A. All required federal and state environmental permits have been identified for the Projects as indicated in the Permit Matrix, **Exhibit 2** to my testimony. Required permits, consultations, and certifications needed include:

- Clean Water Act ("CWA") Section 404 Individual Permit ("404 Permit") (U.S. Army Corps of Engineers) ("USACE")
- CWA Section 401 Water Quality Certification ("401 WQC") South Carolina Department of Health and Environmental Control ("SC DHEC")
- Coastal Zone Consistency Certification (SC DHEC, Office of Ocean & Coastal Resource Management ("OCRM"))
- National Historic Preservation Act ("NHPA") Section 106 Consultation (SC Department of Archives and History)
- Endangered Species Act ("ESA") Section 7 Consultation (US Fish & Wildlife, SC Department of Natural Resources)

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- CWA National Pollutant Discharge Elimination System ("NPDES") General Permit for Stormwater Discharges from Construction Activities (Coverage under SC DHEC-OCRM, via Georgetown County Stormwater Division as Municipal Separate Storm Sewer System operator)

Q. What is the status of the cultural and historical analysis and consultation for the Project Area, and what does it show?

A. The Applicant engaged HDR to conduct a cultural resources assessment for the proposed Project Area (**Exhibit 5**). The assessment was carried out pursuant to Section 106 of the NHPA. The assessment was submitted to the SC Department of Archives and History, as the designated State Historic Preservation Office ("SHPO") for Section 106 consultation. SHPO consultation ensures the review is performed in cooperation with federal and state agencies, local governments, and private organizations and individuals.

From the assessment, no potential historic architectural resources or archaeological sites eligible for the National Register of Historic Places ("NHRP") were identified as being located in the Project Area. While one NRHP-potentially eligible archaeological site was identified within the 0.5-mile buffer surrounding the Project Area, it was confirmed that none are located in the Project Area itself. The assessment identified no archaeological resources in the Project Area. There are no historic architectural resources within or near the Project Area. HDR recommended that no additional cultural resources survey of the Project Area was necessary. In a letter responding to the assessment, the South Carolina

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SHPO accepts the assessment as being final subject to being provided a final copy with all underlying data (**Exhibit 5**). HDR provided printed copies of the final assessment to South Carolina SHPO on September 22, 2021, and SHPO confirmed receipt on October 18, 2021. Based on the assessment, there appears to be no cultural resources impact that would prevent archaeological and historic architectural resource clearance for the Projects.

Q. What is the status of the CWA Section 404 wetlands permit and what does the wetlands analysis show?

A. As required under Section 404 of the CWA, the applicants have completed a wetland delineation for the Project Area which has been submitted to the USACE as part of the Joint Permit Application. While wetlands and waters as delineated have not been verified or finally agreed as of yet by USACE, we do not anticipate revisions or material changes. Permit drawings have been submitted to USACE as a part of the Applicants Section 404 permit application, as well as for other permit applications under the CWA. We submitted the 404 Permit application to USACE, 401 WQC application to SCDHEC, and Coastal Zone Consistency certification request to OCRM on December 20, 2021.

Based on the conceptual designs prepared to date, potential wetlands impacts and proposed mitigation can be reasonably understood. Currently, the Projects are expected to result in approximately 1.34 acres of permanent wetland impact associated with the construction of gravel access roads and inverter pads . During conceptual design, the proposed gravel access roads were realigned with the existing logging roads to minimize

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impacts to wetlands. Access roads were also shortened or shifted to avoid further permanent impacts to wetlands. Temporary sediment basins and the proposed substations were shifted to upland areas of the site. The Projects, as currently planned, would result in approximately 122 acres of temporary wetland impacts, as minor grubbing and site preparation would occur in the cleared wetlands to drive piles to support the solar panels. Discharge of fill is not anticipated in the temporary impact areas and wetlands would remain underneath the solar panels. Pre-construction contours will remain, and native wetland seed mixes will be used to re-establish an herbaceous wetland. After an agency site visit on February 16, 2022, HDR is reviewing the conceptual plans and considering adjustments to the solar array configuration in an effort to avoid additional wetlands. If design changes occur, updated permit drawings and impact calculations will be provided to the USACE, SCDHEC, and OCRM.

The waterflows identified in the Project Area have been channelized and/or are roadside ditches. No impacts to streams are anticipated based on conceptual design; however, approximately 30 linear feet of stream impact may be needed to install an access road to the proposed substation. Interior site access to the substation is needed for security and operations and maintenance purposes. A pipe or culvert would be placed in the stream to maintain existing hydrology. Solar panels may be placed on either side of streams or ditches but are unlikely to result in any impacts.

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When considering these impacts, it is important to recall the past and current use of the Project Area. In the case, the Project Area and wetlands within have been heavily utilized for silviculture for many years. The Project Area has been managed for timber production for over fifty years and various portions of the Project Area are either currently undergoing active silviculture management or have been recently cleared. As a result of these uses, wetland hydrology, soils, and vegetation have previously been altered and already have very impaired functions.

Q. Of the other environmental permits required for the Projects, what are their status?

A. HDR will submit a Notice of Intent, including an erosion and sediment control plan and stormwater pollution prevention plan, to obtain NPDES coverage under SC DHEC's Construction General Permit for Stormwater Discharges from Large and Small Construction Activities to SC DHEC and Georgetown County in or around April 2022. HDR anticipates concurrent review of the Notice of Intent and associated plans, with SC DHEC issuing approval first followed by Georgetown County.

The Applicants have completed consultation with the USFWS and SCDNR. No threatened or endangered species were found in the Project Area and no further consultation or wildlife permitting is necessary.

Q. What are the overall environmental impacts expected from the Projects?

A. As demonstrated in the attached environmental analyses and permit applications, the Projects will result in no significant impacts. For each of the Projects, the Applicants will

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comply with permits and their conditions, once received by the agencies, including mitigation.

Apart from permitting, the Projects by their nature provide valuable environmental benefits. The Projects will provide clean renewable power with minimal environmental impacts. Non-invasive, wetland vegetation will be planted beneath a portion of the solar panels. Vegetation and land management practices will be used to increase the overall biodiversity of the site and conditions of the soils. While minor, short-term noise and air quality impacts may occur during construction, they will be comparable to the noise and air emissions generated by timber activities currently being conducted on the Site. Once the facility is operational, there will be no permanent noise or air impacts to the surrounding area.

Q. Do you expect that the Applicants will be able to timely obtain all environmental permits?

Based on the detailed site due diligence and environmental studies to date, I believe that there are no conditions which should adversely affect the Projects' ability to obtain all permits needed to maintain environmental compliance.

Q. Will you update your testimony based on information that becomes available?

A. Yes. I will revise and add to my testimony on behalf of Lambert I and Lambert II via supplemental or amended testimony if new information becomes available or known. If

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there are design changes or new regulations which impact permitting, the Applicants will submit timely amendments and I will update my testimony as appropriate.

Q. Does this conclude your testimony?

A. Yes. Thank you for the opportunity to provide my sworn testimony in this important matter, and I further look forward to providing live testimony if needed.