## SANDUSKY COUNTY REGIONAL PLANNING COMMISSION

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Woodville Township Zoning Commission 321 E. Main St. Woodville, OH 43469 26 July, 2022

Members of the Zoning Commission,

The Sandusky County Regional Planning Commission reviewed the proposed zoning regarding Large Wind Energy Systems at our July meeting. We had a robust discussion about the proposal, and I have been directed to share our comments and recommendation.

On the fundamental question of whether these types of structures are an appropriate use in Woodville Township, we must defer to the local elected officials. Wind turbines are an expanding use in our area, and opinions vary widely. Your board and your Trustees are best suited to decide this matter. I personally believe we are going to see more demand for these installations and other renewable power sources in the near future.

With that, we believe that should you choose to allow larger wind turbines in Woodville Township, this proposal is a reasonable starting point. We have found a few concerns and issues.

First, the proposed definition of a <u>Large Wind Energy System</u> includes language allowing turbines larger than a <u>Small Wind Energy System</u> but only "intended primarily to reduce the on-site consumption of ... power..." We question why this qualification is necessary. A larger wind turbine of up to 5 Megawatts will have the same impact on the Township whether the electricity generated is used on site or sold to the grid. For utilities, once they pass this 5MW output they are the domain of the Power Siting Board (PSB). We should consider on-site generation for up to 20 MW with this amendment, but see no need to limit utility generation up to 5MW.

In proposed Section 1.b the proposal allows only "three-blade horizontal axis wind turbine(s)." Though these are the most common type, there are other form factors in use. We recommend striking this line.

Section 1.c allows Large Wind Energy Systems as a permitted use in M-1, M-2, and Q-1 districts only. We recommend making these larger turbines a conditional use in these districts, and devising an appropriate set of criteria for reviewing proposed installations.

Section 2 states that towers "shall not exceed the maximum height in the zoning district." Your resolution currently restricts all structures or buildings to 35', except in M-2 which has no limit. Q-1 makes no mention of maximum heights. We recommend setting a maximum height or standardizing the language between M-2 and Q-1 at the least.

Section 3 details setback requirements. The section states that "turbines shall be set back 1,500 feet from the property line from any parcel zoned as agricultural, residential or commercial..." It goes on to say that turbines "must be setback 200 feet from the property lines of any parcels zoned in any other manner." While 1,500 feet is sufficient for the districts listed, we feel that 200 feet is not far enough in all cases, even in industrial districts. We recommend increasing the setback for the "other" districts to at least 110% of the total height of a tower, this total height to include the blades at their highest point of rotation. You may also want to consider what is an appropriate setback for the S-1 district. While you don't allow residential construction, you do allow parks in this district, and the 1,500 foot setback would not apply to those uses in an S-1 district.

Section 5 states that a "Large Wind Energy System shall comply with all applicable sections of Chapter 3781 of the...[ORC]." This section refers to building departments and other codes, and it is unclear how exactly it might apply to a proposed project. We should perhaps consider language stating that all towers must comply with State or Local building codes without specifying which section of the ORC.

Section 6.a deals with noise levels for systems. This language is the same as that currently in the book and my comments are the same for these. I would leave this language in place, with the understanding that measuring sound levels is a complicated technical process, and enforcement of this rule may require the hiring of an expert to make the measurements.

Section 6.c mentions logos on the turbine nacelle, and other aesthetic issues. We recommend discussion of this, while noting that a reasonable logo on the turbine nacelle is not uncommon in other locations.

With these concerns in mind, we would endorse the approval of this revised amendment if the Township chooses to adopt Large Wind Energy System zoning.

Thank you for your continued support of our Commission, and please call me if you have any questions or need additional comments.

Respectfully,

John Willey

**Executive Director**