

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application)
of Kingwood Solar I LLC, for a)
Certificate of Environmental) Case No. 21-0117-EL-BGN
Compatibility and Public Need)

**DIRECT TESTIMONY OF NICHOLAS PITSTICK ON BEHALF OF CITIZENS
FOR GREENE ACRES, INC., JENIFER ADAMS, P. CHANCE BALDWIN,
JACOB CHURCH, VERITY DIGEL, JED HANNA, KRAJICEK FAMILY
TRUST, JAMES JOSEPH KRAJICEK, KAREN LANDON, NICOLE MARVIN,
CHAD MOSSING, KAREN MOSSING, NICHOLAS PITSTICK, KYLE SHELTON,
MARLIN VANGSNESS, JEAN WEYANDT, AND JERALD WEYANDT**

Q.1. Please state your name and home address.

A.1. Nicholas Pitstick. I live at 951 Clifton Road, Xenia, OH 45385 with my wife Natalie
Pitstick.

Q.2. On whose behalf are you offering testimony in this case?

A.2. I am offering testimony on behalf of Intervenor Citizens of Greene Acres, Inc., Jenifer
Adams, P. Chance Baldwin, Jacob Church, Verity Digel, Jed Hanna, Krajicek Family
Trust, James Joseph Krajicek, Karen Landon, Nicole Marvin, Chad Mossing, Karen
Mossing, Nicholas Pitstick, Kyle Shelton, Marlin Vangsness, Jean Weyandt, and Jerald
Weyandt. My testimony will refer to the Citizens for Greene Acres, Inc. as "CGA."

Q.3. Are you an intervenor in this case?

A.3. Yes.

Q.4. Are you or any members of your immediate family a member of CGA?

A.4. Yes, Natalie Pitstick and I are members of CGA.

Q.5. What is your occupation?

A.5. I am a mechanical engineer.

1 **Q.6. Are you familiar with the location that has been proposed for the Kingwood Solar**
2 **project?**

3 A.6. Yes. I have become familiar with the proposed project area by reviewing maps of the
4 project area in the application filed with the Ohio Power Siting Board. In my testimony, I
5 will refer to the Kingwood Solar project as the “Project” and the land proposed for the
6 site of the Project as the “Project Area.”

7 **Q.7. Do you or any members of your immediate family own property adjacent to the**
8 **Project Area?**

9 A.7. Yes, Natalie Pitstick and I own and live on property consisting of five acres of land and a
10 house at 951 Clifton Road in Xenia, Ohio, which is adjacent to the Project Area. The
11 Project Area is adjacent to the entire north side and the entire east side of our yard.

12 **Q.8. How long have you owned your property at 951 Clifton Road?**

13 A.8. We have owned our property for 37 years.

14 **Q.9. What is the proximity of your yard and the Project Area?**

15 A.9. The Project Area borders our backyard and the northeast side of our yard, so there is no
16 space between our yard and the Project Area on those sides.

17 **Q.10. What is the distances between your house and the Project Area?**

18 A.10. The Project Area is about 140 feet in a perpendicular direction from the back wall of our
19 house.

20 **Q.11. Describe your yard.**

21 A.11. The backyard contains a lawn, picnic shelter, grill, and swing set. The backyard and
22 northeast side yard have some trees whose lowest branches are high enough to allow an
23 unobstructed view of the land behind them, as well as some young deciduous and

1 evergreen trees. The swing set is located about 75 from the Project Area. A barn is
2 located in the side yard on the southwest side of the house.

3 **Q.12. Describe your views of the Project Area from your house and yard.**

4 A.12. We can see the Project Area from most of the backyard and side yards and from the
5 kitchen and living room windows of the house. These views are shown in Exhibits A
6 through H, which are true and accurate copies of photographs that I took. The following
7 is additional information about the views in these photographs:

8 Exhibits A, B, and C are photographs of parts of the backyard that I took while
9 standing in the backyard. Exhibits A and B were taken while I stood about 10 to 15 feet
10 from the house and Exhibit C was taken while I stood about 40 to 45 feet from the house.
11 The standing cornstalks are in the Project Area. I took these photographs in the fall of
12 2021.

13 Exhibits D through H are photographs of parts of the backyard that I took while
14 standing about 10 to 15 feet from the house. Exhibits D, F, G, and H were taken while I
15 stood about 10 to 15 feet from the house and Exhibit E was taken while I stood about 40
16 to 45 feet from the house. The harvested cornstalks are in the Project Area. I took these
17 photographs on February 20, 2022.

18 **Q.13. What if any recreational activities are conducted in your yard?**

19 A.13. Natalie and I relax, grill food, eat, and socialize in the backyard at the picnic shelter.
20 Natalie has a hobby craft room in the barn, and I have a wood shop in the barn. Our
21 grandchildren play in our yard.

22 **Q.14. Have you seen any wildlife in your yard or in the Project Area adjacent to this**
23 **yard?**

1 A.14. We commonly see birds in our yard such as goldfinches, woodpeckers, and red-tailed
2 hawks. We see coyotes, raccoons, and opossums. Deer walk through our backyard
3 during most evenings.

4 **Q.15. Have you visited any solar projects constructed in Ohio?**

5 A.15. Yes, I have visited the Hillcrest Solar Farm.

6 **Q.16. What were some of your observations about the conditions at the Hillcrest Solar**
7 **Farm?**

8 A.16. The solar project outside of the fence was overrun with weeds such as foxtail, mare's
9 tail, tall grasses, and thistles. Many of the weeds were taller than the taxus evergreen
10 trees and bushes along the fence. The taxus were only two to three feet tall. About half
11 of the taxus and bushes in the screening outside of the fence were dead or dying.

12 **Q.17. Based on your visit to the Hillcrest Solar Farm, do you have any concerns about**
13 **siting a solar project along your yard?**

14 A.17. Yes, I am concerned that weeds from the solar project could spread to my yard and that
15 the solar project could be an eyesore when viewed from my yard and house.

16 **Q.18. Does this conclude your direct testimony?**

17 A.18. Yes.

18

19

EXHIBIT A



EXHIBIT B



EXHIBIT C



EXHIBIT D



EXHIBIT E



EXHIBIT F



EXHIBIT G



EXHIBIT H



1 **CERTIFICATE OF SERVICE**

2
3 I hereby certify that, on February 28, 2022, a copy of the foregoing written direct
4 testimony was served by electronic mail on the following: Jodi Bair at
5 Jodi.Bair@ohioattorneygeneral.gov; Daniel A. Brown at dbrown@brownlawdayton.com; Kevin
6 Dunn at kdd@planklaw.com; John Hart at jehartlaw@gmail.com; Werner Margard III at
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12 amilam@ofbf.org; and Leah F. [Curtis at lecurtis@ofbf.com](mailto:Curtis@lecurtis@ofbf.com).

13 /s/ Jack A. Van Kley
14 Jack A. Van Kley
15

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in

Case No(s). 21-0117-EL-BGN

Summary: Testimony of Nicholas Pitstick electronically filed by Mr. Jack A. Van Kley on behalf of Citizens for Greene Acres, Inc. and Adams, Jenifer and Baldwin, P.Chance and Church, Jacob and Digel, Verity and Hanna, Jed and Krajicek, James Joseph and Krajicek Family Trust and Landon, Karen and Marvin, Nicole and Mossing, Chad and Mossing, Karen and Pitstick, Nicholas and Shelton, Kyle and Vangsness, Marlin and Weyandt, Jean and Weyandt, Jerald