

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

1 **Q. 1. Please state your name, title, and address.**

4 **Q. 2. What is your education and professional background?**

9 My education, licensure and experience provide a unique understanding of the natural
10 environment and how development affects that environment along with how human impacts such
11 as land use planning and zoning affect the preservation or development of the landscape.

MIAMI TOWNSHIP EXHIBIT

1 Code Update. I also participated as the Chair of the Land Team of the Partners for the Environment,
2 which facilitated land use maps and data collection for the Miami Valley Regional Planning
3 Commission open space plan - Going Places Land Use Plan.

4 My site design experience spans both public and private sectors and is formed upon a
5 foundation in sustainability. I have practiced in the private sector for over 20 years including
6 owning two design firms. This practice area has provided me with a deep understanding of
7 planning and development and the impacts that development has on surrounding land uses and the
8 natural environment. I have presented at numerous conferences including the Miami Valley
9 Planning and Zoning Conference on topics of sustainable site design, stormwater management and
10 zoning impacts on site design. My career in the private sector has resulted in the completion of a
11 wide range of project types including residential, commercial, institutional, and municipal.

12 My most recent practice area has been in public service for Five Rivers MetroParks as the
13 planning manager with responsibilities for site design, site planning and master planning. This
14 written testimony is my own and does not represent the views of my employer. With Five Rivers
15 MetroParks, I continue to develop my experience with native plant communities, soil protection
16 and restoration, and site and regional planning. Working with other degreed professionals such as
17 wildlife management and biologists have increased my experience with habitat management in all
18 aspects of my design and planning work.

19 The basis for creating low impact design and development relies on a comprehensive
20 understanding of the interrelationship of soil, water, plants and living organisms including humans.
21 The basis of my practice of Landscape Architecture has always been to understand this complex
22 relationship and translate that knowledge to create designs that produce environmentally
23 sustainable solutions for my clients. This has included developing projects in the Miami Valley

1 that include low impact solutions such as rain gardens, bioswales, and permeable pavements,
2 creating sustainable learning environments in multiple school districts that incorporate sustainable
3 design to demonstrate to students the importance of low impact design on the environment. Most
4 recently, I have been involved in developing planning and design guidelines that require the use
5 of sustainable practices for the park district where I am employed as well as developing
6 comprehensive master plans that include multi-disciplined perspectives for each of the 18 parks
7 and 16,000 acres in the park district.

8 **Q. 3. On whose behalf are you offering testimony?**

9 **A. 3.** I am offering testimony on behalf of intervenors Miami, Cedarville, and Xenia Townships.

10 **Q. 4. What is the purpose of your testimony?**

11 **A. 4.** My purpose for this testimony is twofold. First, I want to address the impacts that
12 Kingwood's proposed solar facility can have on the project area, including soils, vegetation,
13 runoff, and water resources. Second, my testimony will demonstrate that the proper location of
14 these types of installations must be well-planned to be profitable but must also fit into the natural
15 and built environment. The importance of regional and land use plans to guide the proper
16 placement of these utility solar facilities cannot be understated in order to protect critical land uses
17 as well as surrounding landowners.

18 **Q. 5. Are you familiar with the location the applicant proposed for the Kingwood Solar**
19 **Project?**

20 **A. 5.** Yes, I am familiar with the proposed location in Miami, Cedarville and Xenia Townships
21 in Greene County Ohio.

22 **Q. 6. What studies did you undertake in support of your testimony?**

1 **A. 6.** In addition to my education, continuing education, and over 30 years of experience as a
2 registered professional, I read and studied the Kingwood’s application and other submitted
3 documents. I also studied the local topography and aerial photographs, utilized Google Street view
4 and in-person site driving visits to understand the proposed site, reviewed the USGS soil survey
5 to understand the soils in the project area, reviewed the zoning codes for the affected townships,
6 and reviewed Greene County’s regional land use plan and agricultural preservation plan.

7 **Q. 7. How will the Project impact soil resources within the project area?**

8 **A. 7.** Soils are a critical component for all projects involving land use. Healthy soil sustains life
9 by sequestering carbon, filtering water, and providing nutrients and structure for plants and
10 millions of life-sustaining organisms to live and grow. Soils are a living system with structure and
11 an entire ecosystem of nutrients and living fungi and bacteria that all work together to provide the
12 many benefits we need to survive. Damaging and thereby destroying soil creates “dirt” that has
13 very limited benefit.

14 Non-agricultural development in the project area should be limited because of the soil’s
15 quality and ability to support ongoing agricultural use. The USGS Soil Survey (United States
16 Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey
17 <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>) indicates that a vast majority of the
18 soils in Kingwood’s project area are classified as prime agricultural. This means that suitability to
19 produce agricultural products in the project area is quite high. Because the long-term intent for the
20 project area is to be agricultural, these prime agricultural soils should be maintained for agricultural
21 uses and not disturbed, damaged, or destroyed by this project or any other non-agricultural land
22 use.

1 The USGS Soil Survey provides suitability rankings for various land uses such as
2 construction, road building and for solar arrays. According to the Survey, the project area soils
3 also rank mostly “very limited” on the ability to support Solar Arrays and Soil-Based Anchor
4 Systems. This means that the soil and underlying subsoils and bedrock have characteristics which
5 will require additional engineering to ensure that solar panels are able to withstand environmental
6 factors such as wind loads and corrosion resistance to remain in place. This would also indicate
7 that a higher level of soil disturbance will be required to properly anchor the arrays, creating
8 another possibility for soil damage.

9 Construction activities can compact soils due to equipment usage, but it can also loosen
10 soils due to the installation of the support systems. Loose soils are susceptible to erosion. If the
11 agricultural fields are simply transitioned from their open soil condition to construction, there is a
12 serious risk of damaging erosion that can destroy the soils permanently. Without an established,
13 mature vegetation cover, soil is easily disturbed by vehicular movements, grading and construction
14 activities which will result in soil erosion. Once soils become eroded and disturbed, the beneficial
15 characteristics of prime agricultural soil is lost.

16 In addition, regrading of large sites such as the one proposed will highly degrade the rich,
17 prime agricultural soils found on the site. Despite Kingwood’s promise that minimal ground
18 disturbance and/or grading is required for the Project, it is unlikely that Kingwood will adequately
19 work to utilize existing grades to ensure that soils are not destroyed. Moving soil using earth
20 moving equipment damages the existing soil structure and the millions of living organisms needed
21 to maintain it as actual, living soil. Additionally, Kingwood’s plan to strip and stockpile topsoil
22 during grading activity will destroy existing soil structure along with the living components found
23 in healthy soils. *See Appendix O* (“...before any grading occurs, topsoil will be stripped and

1 stockpiled for future use. All stockpiled soil will be inspected for noxious weeds. Topsoil will be
2 reestablished for areas where grading was necessary”). It can take tens or hundreds of thousands
3 of years to create living, healthy soil, (Boggs, Joe “Soil Basics.” April 27, 2016
4 <https://hamilton.osu.edu/sites/hamilton/files/imce/Soils%20General%20Ver%204-27-2016.pdf>),
5 but a single pass of an earthmoving excavator, let alone stripping and stockpiling, will turn that
6 same soil into dirt with reduced or no ability to grow plants. Simply respreading the stockpiled dirt
7 and expecting it to have the same structure and living components as the soil it once was, is
8 impossible.

9 Of critical importance, work must never occur when soils are wet or saturated. This is
10 critical not only during construction but also during routine maintenance such as cleaning,
11 mowing, inspections, or removal processes. Work occurring on wet soils with equipment can result
12 in the destruction of the vegetative cover by rutting, but also severely compact soils and possibly
13 result in soil damage and serious erosion.

14 In this case, there are so many variables (i.e., multiple contractors, weather conditions, and
15 simple human error) that any one mistake can result in the permanent destruction of this prime
16 agricultural soil—destruction that may take many generations to restore. In my 30 years of
17 practice, it has been incredibly rare, despite the best intentions of an owner or contractor, to not
18 have something go wrong during the project implementation or its ongoing management. When
19 unpredictable weather conditions, project deadlines and human activity are combined, there are
20 many possibilities for mistakes and damage to occur. It is simply unrealistic to assume that all
21 needed conditions will be in place on a project scale of this size, and for 40 years of its existence
22 that nothing will go wrong to damage the underlying prime agricultural soils.

23 **Q. 8. How will the Project impact vegetation within the project area?**

1 **A. 8.** The establishment and maintenance of vegetation is a critical component to ensuring that
2 the site can be reverted to agricultural use after the lease expires. Kingwood has provided few
3 details about the seed mix and plant species it intends to use to mitigate harmful effects of the
4 Project on the existing agricultural land. Indeed, Kingwood's application as a whole provides scant
5 detail about the steps it will take to protect and preserve the project area's agricultural land, and in
6 addition does not recognize the significant impact this installation will have on the local landscape.
7 The proposal is therefore insufficient to determine whether the area will be appropriately
8 developed, managed and restored.

9 The existing vegetation inside and surrounding the project area consists of a traditionally-
10 agricultural character including wood lots, vegetated fence lines, and open agricultural fields.
11 Kingwood proposes to alter these existing, environmentally beneficial features. First, Kingwood
12 proposes the removal of approximately 25.5 acres of wood lots to make room for additional solar
13 array installations. In my professional experience, these wood lots exist for a particular reason, but
14 also provide significant ecosystem services and should not be removed for this relatively short
15 lease period compared to the time it took for the wood lot to mature. Wood lots, typically consisting
16 of mature trees well over 20 years of age, provide stormwater control, critical habitat for a wide
17 variety of beneficial insects and animals as well as a visual break in the landscape. *See Bringing*
18 *Nature Home*, Doug Tallamy, 2009. The conversion of these wood lots will result in an increase
19 in stormwater runoff simply by changing the runoff coefficient or curve number of this portion of
20 the site.

21 In addition, a landowner for some reason allowed these wood lots to develop in lieu of
22 using that land for agricultural practices. In my past observations of isolated wood lots, I have

1 regularly encountered drainage issues, high water tables, or shallow bedrock that may negatively
2 affect development suitability.

3 Kingwood's proposed removal of wood lots should be prevented due to the small benefit
4 to the Project and the high negative impact to the natural ecosystem. These wood lots cannot be
5 replaced in a short period of time and should be protected. They provide high value to the natural
6 environment and should remain.

7 Second, Kingwood also proposes to remove established vegetated fence rows. These are a
8 part of the visual agricultural character of the region but also provide ecosystem services.
9 Ecosystem services include providing wind breaks to prevent erosion, providing a break to
10 overland water flows, providing wildlife habitat and movement corridors, and providing a
11 diversification of species in the overall landscape. *See* The Benefits of Healthy Hedgerows,
12 People's Trust for Endangered Species, [https://ptes.org/wp-content/uploads/2020/05/Healthy-](https://ptes.org/wp-content/uploads/2020/05/Healthy-hedgerows-and-key.pdf)
13 [hedgerows-and-key.pdf](https://ptes.org/wp-content/uploads/2020/05/Healthy-hedgerows-and-key.pdf). As with the wood lots, these landscape features provide many ecological
14 benefits and should remain.

15 Finally, Kingwood proposes to rapidly alter the existing agricultural fields with potentially
16 devastating effects. Protection of the fields during construction, for the life of the lease and during
17 decommissioning will require the proper selection of plant species and a slow transition from open
18 agricultural fields to prairie. Ideally, transition plantings should be utilized to help the agricultural
19 ground convert to a long-lasting prairie or meadow condition and utilizes species that can support
20 the construction process. This interim planting begins to restore needed soil structure and natural
21 beneficial organisms that native prairies and meadows need to thrive. My experience shows that
22 the final native plantings establish more rapidly in an interim planting area than if planted directly
23 on agricultural ground. Once construction is completed, a permanent matrix of desirable native

species must be installed that will provide soil protection, soil building and support for native insects and wildlife populations while helping to ensure that the underlying soils can be reverted to agriculture once the lease ends. The design of the plantings, installation and ongoing management requires the expertise of a professional or firm that specializes in this type of landscape. This is a highly managed landscape that requires not only the proper installation techniques, but also years of oversight to ensure that the desired landscape establishes properly without the establishment of invasive species. After establishment, routine management of the landscape is required that includes mowing and management of invasive species. This routine landscape management work must be performed by a qualified professional that specializes in this style of landscape and has demonstrated continued success of establishment and management in Ohio.

Kingwood's approach, in contrast, may allow a variety of non-desirable or invasive species to establish on the site and eventually spread to surrounding properties and potentially to the neighboring fields, John Bryan State Park, and/or Glen Helen Reserve. On page 90 of its application, Kingwood states, "As an initial step in the construction process, the existing ground vegetation will be preserved and/or enhanced. Only minimal ground disturbance is associated with construction; existing vegetation will continue to provide benefits for ground stabilization and habitat throughout the construction process." Yet this statement makes no sense in the agricultural field setting. Except for the fence rows and wood lots that the applicant plans to remove, there is no "existing vegetation." The agricultural fields have no established vegetation that will protect the soil during construction. Certainly, re-grading the site, adding acres of roadway, and installing solar arrays will have a higher level of disturbance than "minimal." This statement alone indicates

Kingwood’s significant lack of awareness as to what protective vegetation is and what is required to protect these prime soils.

Additionally, Appendix “O” to the application states, “The seeding mix will be a pollinator-friendly, native blend designed to prevent the establishment and/or further propagation of noxious weeds. Seeded areas will be uniform, free of ruts, erosion and/or bare and dead spots, free of weeds, and have a minimum 80% cover of germinated perennial seed.” Native seed to be pollinator friendly must be from a local regional ecotype and not a generic seed mix designed for general use. The application and Appendix give little information about the seed mix Kingwood plans to use. But most importantly, Kingwood’s threshold of 80% minimum cover of germinated seed may allow 20 acres of bare ground for every 100 acres seeded, which is an unacceptably high level of bare ground and erosion potential in a project that spans approximately 1,500 acres. Following Kingwood plan, around 300 acres could remain bare ground during the project, unprotected from erosion and noxious weeds.

Q. 9. How will the Project affect drainage and runoff?

A. 9. Anytime land is modified, the drainage and runoff on the land will change in some manner. The level of change can be subtle or significant depending on the modifications. Kingwood proposes to modify the land by installing roads and solar panels, removing trees and vegetation, and regrading. In addition, Kingwood’s construction activities are likely to cause damage to existing subsurface drainage tile and will compact soils. These area-wide changes will significantly affect drainage and runoff patterns of the project area. The simple addition of 35 acres of impervious roadways and the removal of over 25.5 acres of wood lots alone will have a significant impact on the runoff occurring on the site. These two elements alone (approximately 60 acres total)

1 are about 4% of the project area. Kingwood has dismissed the impact these activities will have on
2 the site.

3 As discussed above, healthy soils can filter and absorb a certain percentage of storm water
4 flow before the rest runs off as over-land sheet flow. Soil modification due to compaction from
5 construction means less water can infiltrate or be absorbed by the soils and more will run off.
6 Removal of trees and vegetation will likewise result in more runoff because those structures will
7 not be present to slow surface flow, and their root systems will no longer be present to take up
8 water from already-saturated soil.

9 The Project may also impact offsite water resources such as perennial streams, ephemeral
10 streams, and other drainage structures. All construction sites over one acre fall under the
11 requirements of the National Pollutant Discharge Elimination System (NPDES). *See*
12 <https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/stormwater-program>. The
13 applicant is acknowledging that disturbance will happen and will require a permit to control the
14 disturbed land. This includes temporary or permanent erosion and stormwater control devices
15 which are legally required to be constructed and will further alter soils and drainage patterns, at
16 least in the short term. The application also indicates that the installation will not discharge into
17 streams or water bodies (Application, Pg. 43). Yet all land drains to a stream or water body. Any
18 discharges coming off the site must be managed and not affect a neighboring property and the
19 eventual receiving stream. In addition, Kingwood indicates that the Project will not result in
20 significant changes in flow patterns despite adding acres of impervious surface—i.e., roads and
21 solar panels—to the project area (Application, Pg. 44). Adding impervious surface in any drainage
22 area will have a significant impact on the existing drainage patterns. Kingwood has failed to
23 account for these changes in drainage and runoff and their effect on surface water resources.

1 The solar panels themselves will impact how rainfall interacts with the site. Kingwood
2 proposes to install 410,000 solar panels. The panels will catch and direct stormwater (like a roof),
3 causing concentrated flows off of the low side before falling into the ground below. This
4 concentrated flow will cause a change to the drainage patterns at each of the panels. Moreover,
5 because the soil is being disturbed during installation there is a good chance that the concentrated
6 flows will erode the already disturbed ground.

7 Kingwood proposes to build 11.3 miles of gravel roadway within the project area—which,
8 if the road is 20' wide as described, is approximately 27 acres of impervious road surface. These
9 surfaces will have a significant impact on the drainage of the site. These road surfaces are made of
10 compacted gravel and are very similar to a paved roadway in terms of their water-runoff behavior.
11 These gravel roadways will affect the drainage patterns on the site and cause concentrated flows
12 along their edges causing erosion and runoff.

13 On any development project site, water quality is always an issue. There are significant
14 requirements for erosion and sediment controls required by the EPA for sites disturbing over 1
15 acre, because significant damage can occur to soils and receiving water bodies. If quality
16 vegetation is not maintained during construction and ongoing management activities, soil erosion
17 can occur causing significant water quality issues that can damage offsite properties. Erosion
18 control is critical for the Project to prevent loss of soil and reduction in runoff water quality.

19 Kingwood's application proposes a process to locate drainage tile within the project area
20 to avoid damaging this existing subsurface drainage system. Having worked on many properties
21 with drain tiles, I find it highly unlikely that the location of all field tile is well documented or even
22 known at all. Heavy equipment and drilling can easily damage the tile, and considering the number

1 of holes being drilled to install this system, damage is likely to occur further altering drainage of
2 the site.

3 **Q. 10. Are you concerned about the general planning and zoning impacts of the Project?**

4 **A. 10.** Yes. Land use planning and zoning is a balance between landowner rights and the rights
5 of the community as a whole. Long range land use plans are an effective way to help guide
6 decisions being made by both local planning and zoning boards and should also be heavily
7 considered by the OPSB as well. There are appropriate places for utility level solar arrays that can
8 be implemented properly and be a benefit to the environment as a whole. It needs to be properly
9 planned! Landowners should have assurance that what is happening around them will not
10 significantly change their living environment, or will change it based on a general plan that has
11 been developed through a public process that is adopted by the citizens of a particular jurisdiction.
12 These plans help to ensure that communities can develop (or be conserved) in a planned manner
13 so that when development (or conservation) is completed, it results in a sustainable and positive
14 outcome. If these plans are not implemented, incompatible uses and costly results may occur.

15 There needs to be a variety of land uses in our communities for places to live, play, work
16 and do business. There are many examples of how these various uses have been combined, both
17 successfully and poorly across this country. Successful communities are those where property
18 values continue to rise, where people wish to move to, and employers wish to start businesses.
19 These places simply did not happen—they were planned. These places have long range land use
20 plans and zoning documents that work together to help ensure that the rights of landowners are
21 respected but also the good of the community as a whole is achieved to ensure overall success.

22 Greene County is no different. The County has developed a long-range land use plan that
23 shows where agriculture should be located, and where residential, commercial, and industrial uses

1 should happen. This plan was adopted in 2001 and involved many individuals and the public to
2 determine, as a community, what the future of Greene County should look like. This land use plan
3 groups compatible uses together, it suggests limiting development outside of urbanized areas to
4 keep costs to local government and utilities lower by not building as much infrastructure. The
5 County also developed a Farmland Preservation Plan in 2000 to identify and protect one of its
6 greatest assets- Prime Farmland. Agriculture is one of Ohio's largest industries because of the
7 great soils and land that is available to produce food for the world. There is no indication in either
8 of these plans that development of large scale utilities should occur on prime agricultural ground.

9 To reinforce the importance of the Green County Farmland Preservation Plan, recent
10 modifications made in 2019 to the State of Oregon's Land Conservation and Development
11 Department Chapter 660 in response to large scale power generation facilities limit such
12 installations to only 12 acres on high quality agricultural lands.
13 <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3083>. The
14 purpose of Oregon's new set of rules is to "preserve and maintain agricultural lands". So Greene
15 County is not alone in recognizing the importance and value of protecting high quality agricultural
16 soils.

17 There are suggested locations for commercial and industrial uses indicated on the plan.
18 One might argue that utility scale solar was not considered in 2001. However, protecting
19 agricultural ground was considered along with the understanding that commercial and industrial
20 uses bring jobs and income to a community. In addition, the Current Agricultural Use Value
21 (CAUV) program, which many of the leased farms claim the benefits of, was also originally
22 created to protect these large tracts of farmland from development, primarily residential, but also
23 other development that reduces the effectiveness of large tracts of farmland.

1 There are many long-range plans that exist in the Miami Valley that involve agriculture
2 land that is planned for future industrial or commercial land uses. One example is the Northwest
3 Industrial Park in the City of Dayton. This is an area of about seven to eight thousand acres on the
4 northwest side of the City that is currently used for agriculture but is waiting for future
5 development. That area is a great example where a lease could be put into place to generate
6 sustainable solar power and once it is done, the land can be used to develop new commercial or
7 industrial uses or the next sustainable energy system that has yet to be invented. This is an example
8 where plans call for installations like a utility scale solar array with needed infrastructure and the
9 zoning in place to allow it to happen.

10 In terms of zoning, it is my opinion that this utility scale solar array should be classified as
11 light industrial from a zoning perspective. The installation will have a significant effect on the
12 visual character of the agricultural landscape, will be fenced and will produce an industrial grade
13 product. The solar field is not a place of business where the community will come to purchase
14 goods or services which would allow it to fall in a category outlined by the various affected
15 township's zoning codes as commercial.

16 Light industrial land use, even though it is temporary, should be subject to zoning
17 requirements of this type of land use. I have reviewed the zoning codes for the three affected
18 townships related to this type of land use.

19 A primary zoning issue that must be resolved is the setback and screening requirements.
20 The application indicates a minimum of a 25' setback, and based on the layout of the arrays, the
21 setback can be 25' or larger in some places. Of the three townships affected, only Cedarville
22 Township zoning requires screening between residential and light industrial land uses, however
23 there are provisions to reduce the setback requirements when screening is present. In numerous

1 other zoning codes, including Warren County Rural Zoning and the City of Dayton Zoning, it is
2 very common to require extensive screening between residential and industrial zoning land uses.
3 A front yard setback of 25' is present in the Miami Township zoning code, however there are 40'
4 and 50' setbacks in Cedarville and Xenia Townships. Side and rear yard setbacks expand
5 significantly (to 100' in Xenia Township and 200' in Cedarville and Miami Townships) when
6 abutting residential land uses. This significant increase in setbacks is common in other area zoning
7 codes as well.

8 Regardless of the setback distances, this installation will have a significant visual impact
9 to surrounding landowners in the area. There is little difference that a 25' setback versus a 200'
10 setback will make on the changes to views and agricultural character in this project involving 1500
11 acres of 14' tall solar arrays. Current landowners can expect views to be blocked certain times of
12 the year by mature corn plantings. This is part of the agricultural character. However, landowners
13 currently do not have a constant, 14' impeded view, as is proposed by this solar installation. That
14 view will be with them every day for the next 40 years. Increasing the setbacks will not sufficiently
15 mitigate the Project's visual and aesthetic impact in the area.

16 In summary, there is language in both the Greene County Land Use Plan and the Farmland
17 Preservation Plan to maintain the agricultural flavor of the County in agricultural districts, such as
18 where the Project is proposed. A large-scale solar array simply does not fit with this aesthetic
19 character of the area. The applicant has proposed screening at various locations. This planting
20 screen is designed as a traditional industrial development style screen utilizing many non-native
21 plant materials, not trying to blend into the rural character. These proposed planting screens will
22 also provide no long-term benefits to the preservation of the agricultural soils as the existing fence

rows currently do, they would only exist to attempt to soften the views of the installation to surrounding landowners.

The long-range land use plans are designed to protect neighboring landowners from poorly-planned and undesired land uses. Individuals who purchased farms or rural residential homes expected to live in a rural or agricultural setting. Having an industrial use move into this setting is not an acceptable land use and needs to be rejected.

Q. 11. What is your assessment of the overall environmental impact of the Project?

A. 11. Kingwood's proposed use of agricultural land for industrial purposes will cause an unacceptably negative effect on the local natural area and community.

As noted previously, land grading, removal of fencerows and wood lots, other changes to vegetation, and installation of impervious surfaces, will have a significant impact on existing soils, current drainage pathways, flora and fauna of the area and on the potential of restoring this land to productive agriculture in the future.

The location selected for the Project also has a great negative effect on the rural environment in which it is proposed. The visual character is out of scale and aesthetic with what Greene County has long been working to maintain and has included in its long-range plans for over twenty years.

Although a minority of landowners will receive a financial benefit for the next 40 years, taking the longer view and considering the many negative effects on non-lease holders, the proposed location is not appropriate. Will we have the next generation owning a farm that cannot produce food because Kingwood damaged the area's soil for some short-term gain? What will be done with 1500 acres of bad farmland in Greene County 40 years from now that we decided to not protect today? Certainly, we should develop sustainable energy from utility scale solar, but we

1 must do it in a manner that does not destroy natural systems. We are facing many critical decisions
2 about the future of this planet, including a switch from fossil fuels to renewable energy sources.
3 But are we asking the right questions and thinking broadly enough to avoid trading one bad
4 environmental outcome for another?

5 **Q. 12. Does this conclude your testimony?**

6 **A. 12.** Yes, but I reserve the right to offer additional testimony as may be necessary. Thank you.

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in

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

Summary: Testimony Direct Testimony of Eric Sauer electronically filed by Mr. Lee
A Slone on behalf of Miami Township, Greene County, Ohio, Board of Trustees