#### **BEFORE THE OHIO POWER SITING BOARD**

)

)

)

)

In the Matter of the Application of Kingwood Solar I LLC for a Certificate of Environmental Compatibility and Public Need

Case No. 21-117-EL-BGN

#### SUPPLEMENTAL TESTIMONY OF ANDREW ENGLISH

1	Q.1.	Please state your name, title and business address.		
2		A.1. My name is Andrew English and I am an owner and principal landscape architect		
3		at PLANIT Studios ("PLANIT"). My business address is 500 W. Wilson Bridge Rd., Suite		
4		314, Worthington, Ohio 43085.		
5	Q.2.	On whose behalf are you offering testimony?		
6		A.2. I am testifying on behalf of the Applicant, Kingwood Solar I LLC ("Applicant"),		
7		in support of the Joint Stipulation and Recommendation as to certificate conditions ("Joint		
8		Stipulation"), which was filed on March 4, 2022.		
9	Q.3.	Did you previously provide testimony on behalf of the Applicant?		
10		<b>A.3.</b> Yes, I provided direct testimony that was filed on February 23, 2022.		
11	Q.4.	Did you review the Joint Stipulation?		
12		A.4. Yes. I reviewed the Joint Stipulation, with particular focus on Condition 16 and		
13		the enhanced screening plan incorporated into and attached to the Joint Stipulation through		
14		that condition.		
15	Q.5.	Did you prepare the enhanced screening plan for the Project?		
16		A.5. Yes. At the request of the Applicant, I prepared the enhanced screening plan for		
17		the Project. That screening plan is referenced in Condition 16 and is attached to the Joint		
18		Stipulation. It is also attached to this testimony as Attachment A.		

1

2

**Q.6**.

# How does the screening plan you prepared for the Joint Stipulation compare to the screening plan that was included in the Application?

3 A.6. The screening plan prepared by Haley & Aldrich in April of 2021 (the "2021 Plan") 4 does a good job identifying visual screening areas. Our screening plan expands on that 5 plan and also identifies the existing vegetative buffers located throughout the project. 6 Identifying these areas shows that a large portion of this project will be screened either by 7 natural buffers or by newly created visual buffers. In some areas, we also extended the 8 buffers proposed on the 2021 Plan, such as to reduce views from Wilberforce Clifton Road 9 and OH-72. In total, an additional 4,000 linear feet of vegetative screening has been added 10 since the 2021 Plan was submitted.

# Q.7. In your opinion, do you think the screening plan referenced in and attached to the Joint Stipulation is an improvement over the screening plan that was included in the Application?

A.7. Yes. The new screening plan that is part of the Joint Stipulation is an improvement because, as described above, additional screening has been added to the original plan submitted. The additional 4,000 linear feet of buffering will significantly add to the visual screening throughout the project. Also, it was critical to identify the existing vegetative buffers, as many of these buffers will provide an immediate impact in visually screening the project from adjacent properties.

#### 20 Q.8. Do you support Condition 16 in the Joint Stipulation?

A.8. Yes. The commitments made in the Application, coupled with this condition, will
adequately reduce or minimize the potential visual impacts associated with the Project.
The condition ensures that at a minimum the Applicant will implement the screening

1 modules proposed in the locations identified in Attachment A to my testimony. The 2 condition also takes into account that the landscaping plan will be updated prior to 3 construction as a result of communications with non-participating property owners with a 4 direct line of sight to the Project Area at any time of year. The plan will be developed in 5 consultation with an Ohio-licensed landscape architect prior to commencement of any 6 construction.

7 As I explained in my direct testimony, there are two important prongs to proposed 8 Condition 16 that will insure the effectiveness of mitigation for adjacent, non-participating 9 landowners. First, the Applicant will replace and/or substitute any failed plantings during 10 the first five years after construction to ensure that at least 90% of the vegetation has 11 survived as of the five-year point. The purpose of the five-year period is to allow plantings 12 to become established, after which time plant survival is likely to increase. Second, 13 Condition 16 requires the Applicant to maintain vegetative screening for the life of the 14 Project. As shown in the landscape mitigation plan, screening for the Project will consist 15 of various landscape screening modules. To ensure that screening modules are functioning 16 as designed for the life of the Project, the second prong requires the Applicant to replace and/or substitute failed plantings within a screening module if necessary to ensure the 17 18 screening module remains effective at that location. The requirement in Condition 16 to 19 maintain vegetative screening for the life of the Project will ensure that any plant die-off 20 during the life of the Project will not result in gaps in screening modules.

Additionally, the condition also directs the Applicant to implement a lighting plan. Specifically, to minimize impacts, the Applicant must utilize motion-activated lights that will be downward facing (or fitted with side shields) to narrowly focus light inward towards

3

the facility. Again, because there may be changes in the lighting plan as a result of
communication with non-participating property owners, the condition requires the plan to
be updated prior to construction.

4

#### Q.9. Is Joint Stipulation Condition 16 in the public interest?

5 Yes. The addition of the revised screening plan as a minimum level of screening A.9. 6 for the Project provides an additional 4,000 linear feet of vegetative screening. The 7 requirements in Condition 16 will ensure that the three planting modules proposed in the Application will provide visual screening, soften the horizontal line created by the 8 9 installation of the solar panels, and aid in blending the Project into the surrounding 10 landscape. Additionally, the use of native plant species will also provide environmental 11 benefits to native wildlife and pollinator species. Based on my prior experience in Ohio, 12 mitigation strategies of this type have been successful in reducing and minimizing visual 13 impact. Finally, the condition also ensures that the Project lighting incorporates mitigating 14 designs to reduce impacts from the Project.

#### 15 Q.10. Does this conclude your supplemental testimony?

16 **A.10.** Yes, it does.

#### **CERTIFICATE OF SERVICE**

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served (via electronic mail) on the 4th day of March 2021 upon the persons listed below.

Jodi J. Bair Werner L. Margard Attorneys for Ohio Power Siting Board Staff	Jodi.bair@ohioattorneygeneral.gov Werner.margard@ohioattorneygeneral.gov
Daniel A. Brown Attorney for Cedarville Township Trustees	dbrown@brownlawdayton.com
David Watkins Kevin Dunn Attorneys for Xenia Township Trustees	dw@planklaw.com kdd@planklaw.com
Lee A. Slone Attorney for Miami Township Board of Trustees	lee.slone@dinsmore.com
John E. Hart Attorney for In Progress LLC	jehartlaw@gmail.com
Charles D. Swaney Attorney for Tecumseh Land Preservation Assoc	cswaney@woh.rr.com iation
Jack A. Van Kley Attorney for Citizens for Greene Acres, Inc.	jvankley@vankleywalker.com
Thaddeus M. Boggs Attorney for the Greene County Commissioners	tboggs@fbtlaw.com
Chad A. Endsley Leah F. Curtis Amy M. Milam <i>Attorneys for Ohio Farm Bureau Federation</i>	cendsley@ofbf.org lcurtis@ofbf.org amilam@ofbf.org
/s/ N	lichael J. Settineri

Michael J. Settineri



# This foregoing document was electronically filed with the Public Utilities

# Commission of Ohio Docketing Information System on

3/4/2022 11:50:56 AM

in

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

Summary: Testimony Supplemental Testimony of Andrew English electronically filed by Mr. Michael J. Settineri on behalf of Kingwood Solar I LLC