

**BEFORE
THE OHIO POWER SITING BOARD**

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

REBUTTAL TESTIMONY OF LYNN GRESOCK

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

A.1. My name is Lynn Gresock. I am a Principal Consultant with Haley & Aldrich, Inc. ("Haley & Aldrich"). My business address is 3 Bedford Farms Drive, Suite 301, Bedford, NH 03110.

Q.2. Did you previously present direct testimony in this proceeding?

A.2. Yes, my direct testimony was filed on February 23, 2022.

Q.3. What is the purpose of your rebuttal testimony?

A.3. I am filing rebuttal testimony on behalf of the Applicant, Kingwood Solar I LLC, in response to testimony by Jenifer Adams and Susan Jennings.

Q.4. Have you reviewed Ms. Adams's testimony?

A.4. Yes. I reviewed Ms. Adams's testimony marked as Citizens Exhibit 1.

Q.5. What portion of Ms. Adams testimony will you address?

A.5. I will address Ms. Adams' testimony about the birds she has observed on and near her property.

Q.6. Do you believe these and similar species are present on or near the Project Area?

A.6. Ms. Adams' original direct testimony addressed four general bird species. She noted that red-tailed and other hawks can be observed in the area. This is consistent

1 with our observations as reflected in Table 08-5 of the Application, where Cooper's
2 hawk and red-tailed hawk were listed as observed. Such hawks are very common
3 throughout Ohio, and tend to circle an area as they forage. Ms. Adams also noted that
4 she sees great blue herons. Although this species was not observed during the field visit
5 when species were logged, the presence of the Little Miami River on the opposite side
6 of Clifton Road makes it unsurprising that this wading bird would be seen in the vicinity.
7 Ms. Adams also notes that she has heard sand hill cranes flying overhead above the
8 property. This wetland dependent species has become more prevalent and could be
9 noted migrating through the area. Finally, Ms. Adam's direct testimony noted that bald
10 eagles have been observed in the area. Bald eagle nesting is on the rise in Ohio, and the
11 presence of the Little Miami River on the opposite side of Clifton Road from the Project
12 Area could provide the type of open water habitat this species prefers.

13 During the hearing, Ms. Adams incorporated additional bird species to her direct
14 testimony, listing 14 common birds she sees near her residence. Of these, the field
15 sparrow, European starling, the blue jay, the Northern cardinal, the American robin, the
16 mourning dove, the American crow, the Eastern bluebird, the Canada goose, and the
17 wood duck appear in Table 08-5 of the Application, as field-observed. While red-
18 winged blackbirds, finches, and mockingbirds were not observed at the time, they would
19 be expected to be common visitors to bird feeders for seed and/or suet, and would be
20 unsurprising to see in the area. Vultures are also common throughout Ohio, and would
21 be expected to be observed seeking carrion in fields or along roadways.

22 **Q.7. Do you believe the Project will have an adverse impact on the types of species**
23 **referenced in Ms. Adam's testimony?**

1 **A.7.** No, I do not. Ms. Adam’s testimony implies that the Project may impact the
2 types of species she identified as seeing near her property. The Project Area, however,
3 consists of private land that is predominantly used for active agricultural purposes, with
4 only a very small area of pasture. While the common birds noted above as well as other
5 species of birds may use such land for hunting prey or eating corn and other crops, a
6 monocultural crop that is supported by the use of pesticides typically provides for low
7 habitat diversity. As noted in other testimony, the Project would remove only 1 percent
8 of the similar agricultural land otherwise available in Greene County, and therefore,
9 abundant similar habitat for these species and other common species would remain.

10 That said, the Project will enhance habitat diversity within the Project Area by
11 replacing the monocultural crops with a variety of low-growing plants, including
12 pollinator-friendly species, that can be used as species habitat not only to support a more
13 diverse community, but continue to support those species seeking seeds, grubs, or
14 various insects. Small mammals will continue to be allowed to move through the Project
15 Area, with the use of wildlife permeable fencing, continuing to provide opportunities for
16 raptors to seize prey. This change in habitat may actually increase the opportunity for
17 Ms. Adams to view birds and other species near her property.

18 **Q.8. Have you reviewed Ms. Jennings’s testimony?**

19 **A.8.** Yes. I reviewed Ms. Jennings’s testimony marked as Citizens Exhibit 7.

20 **Q.9. What portion of Ms. Jennings’s testimony will you address?**

21 **A.9.** I will address Ms. Jennings’s testimony about the Project’s impact on wildlife.

22 **Q.10. Ms. Jennings states at page 7 of her direct testimony that “[o]ther ecosystem**
23 **challenges include the loss of habitat for birds, insects, and other wildlife.” Do you**

1 **agree with this statement?**

2 **A.10.** No, I do not agree. In fact, I think the Project could actually result in an increase
3 in wildlife habitat.

4 **Q.11. Why do you think that the Project could actually result in an increase in wildlife**
5 **habitat?**

6 **A.11.** In addition to the renewable energy benefits, which are recognized as beneficial to
7 wildlife in a more global sense, the conversion of the Project Area from active agricultural
8 use to the Project will support wildlife use. As noted above, the current habitat for the
9 majority of the Project Area, although used by various species, is based on a monocultural
10 crop that is exposed to pesticides, harvest, and the resulting changing conditions. Because
11 the panels are raised above the ground, a significant portion of the Project Area will be
12 available for plant growth and improved habitat that will support greater species diversity.

13 The Project will involve plantings with a more diverse character, including
14 pollinator-friendly species that will remain in place for use as habitat. The Project will
15 involve only limited areas of ground disturbance or grading (as noted in the Vegetation
16 Management Plan, Appendix O of the Application). Where such limited activities are
17 necessary, the existing topsoil will be removed, stockpiled, inspected for noxious weeds,
18 and the stockpiled soil will be replaced where needed for reseeded. Joint Stipulation
19 Condition 22 provides additional commitments for limiting the propagation of noxious
20 weeds within the Project Area.

21 Wildlife will continue to use the land encompassed by the Project Area. As noted
22 in Joint Stipulation Condition 15, the security fencing will incorporate frequent openings
23 in the bottom to allow for small mammal and other species passage. The design of the

1 Project also allows for ongoing movement of larger species through the Project Area and
2 surroundings, as it consists of 16 individually fenced areas of solar arrays, rather than
3 encompassing the entire Project Area within a fence.

4 **Q.12. Does this conclude your rebuttal testimony?**

5 **A.12.** Yes.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following via email on
this 14th day of April, 2022.

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 Association

cswaney@woh.rr.com

Jack A. Van Kley
Attorney for Citizens for Greene Acres, Inc.

jvankley@vankleywalker.com

Thaddeus M. Boggs
Jesse J. Shamp
Attorney for the Greene County Commissioners

tboggs@fbtlaw.com
jshamp@fbtlaw.com

Chad A. Endsley
Leah F. Curtis
Amy M. Milam
Attorneys for Ohio Farm Bureau Federation

cendsley@ofbf.org
lcurtis@ofbf.org
amilam@ofbf.org

/s/ Michael J. Settineri

Michael J. Settineri

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Summary: Testimony Rebuttal Testimony of Lynn Gresock electronically filed by Mr.
Michael J. Settineri on behalf of Kingwood Solar I LLC