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BEFORE
THE OHIO POWER SITING BOARD

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RECEIVED-PROCEEDING DIV

In the Matter of the Application)
of South Branch Solar, LLC for a)
Certificate of Environmental) Case No. 21-0669-EL-BGN
Compatibility and Public Need for)
a Solar Facility Located in Hancock)
County, Ohio)

PETITION FOR LEAVE TO INTERVENE OF TRAVIS BOHN

Pursuant to R.C. 4906.08(A)(3) and Ohio Administrative Code ("OAC") § 4906-2-12,
Travis Bohn submits this Petition to Intervene in this proceeding. A memorandum in support of
this petition is provided below.

**MEMORANDUM IN SUPPORT OF
PETITION FOR LEAVE TO INTERVENE**

OAC 4906-2-12(B) provides that the Ohio Power Siting Board ("Board") or
administrative law judge may consider the following criteria when considering petitions to
intervene:

- (a) The nature and extent of the person's interest;
- (b) The extent to which the person's interest is represented by existing parties;
- (c) The person's potential contribution to a just and expeditious resolution of the
issues involved in the proceeding; and
- (d) Whether granting the requested intervention would unduly delay the proceeding
or unjustly prejudice an existing party.

For the following reasons, there is good cause under these criteria to grant me intervenor status
in this proceeding.

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Technician AN Date Processed OCT 22 2021

Nature and extent of interest:

I will be directly and adversely affected by the South Branch Solar Project ("Project"), which South Branch Solar, LLC ("South Branch Solar") plans to construct and operate. I live on my property at 3260 Township Road 254 in Arcadia, Ohio that is directly across the street from and adjacent to the project area ("Project Area") for the Project.

The Project will have a serious adverse impact on my home and property that will spoil the enjoyment of living there. In that regard, I will present evidence about the issues described below, among others, with respect to which the application ("Application") for the Project fails to protect my property and my enjoyment of living there.

1. Unsightly views of solar panels and other solar equipment from my home and yard, which are within a direct line of sight of the Project;
2. Unsightly views of solar areas resulting from lack of maintenance and inadequate weed control;
3. Dirt tracked on the public roads, airborne dust, and traffic near and/or on my property during the Project's construction;
4. Damage to my drainage tiles and surface waterways, including the tile draining the septic system from my home, during the Project's construction and operation;
5. Drawdown of the aquifer in which my water well is drilled if the Project uses groundwater in the vicinity of my home to clean solar panels, water vegetation, or control dust;
6. Potential for increased surface water from runoff from the Project that may flood my property;
7. Lighting that may illuminate my home and yard at night;
8. Inadequate distances between the Project and my home and yard;

9. Noise impacts from Project construction, including noise from heavy machinery and pile pounding;

10. Noise impacts from Project operation, including noise from inverters, transformers, and tracker motors;

11. The spread of uncontrolled noxious and invasive weeds from the Project to my land;

12. The reduction of food production for decades by converting prime farmland into an industrial facility, with the potential that the land may never be returned to agriculture;

13. Harm to deer and other wildlife from habitat loss inside the Project, including overcrowding in areas outside the solar fences due to the animals' exclusion from their prior forage areas inside the Project Area;

14. Infestation in my yard and home from rodents that may move from solar arrays where they multiply while being protected from predators by the solar fences; and

15. Loss of my property's value due to impacts from the Project;

I should be granted intervention so that I can address these and other problems with the Project.

Extent to which interests are represented by existing parties and potential contribution to the just and expeditious resolution of these proceedings:

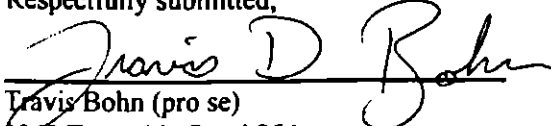
No other party represents, or can represent, my interests in protecting myself and my home from the Project's impacts. As an affected landowner and resident adjacent to the Project Area, my participation in the case is necessary to the just and expeditious resolution of this proceeding.

Potential for undue delay or unjust prejudice:

Granting intervenor status to me will not unduly delay the proceedings or cause unjust prejudice to the Applicant. I will comply with whatever case management schedule that the Board establishes.

For the foregoing reasons, I request that the Board to grant this Petition for Leave to Intervene.

Respectfully submitted,


Travis Bohn (pro se)

6260 Township Road 254

Arcadia, Ohio 44804

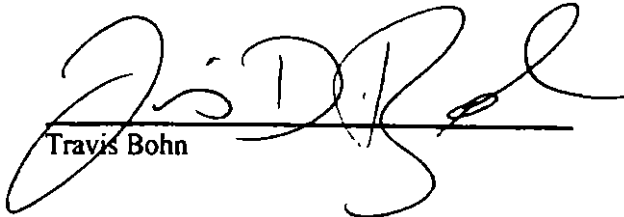
419-889-8483 (telephone)

Email: bohnt398@gmail.com

(Willing to accept service by email)

CERTIFICATE OF SERVICE

I hereby certify that, on October 21, 2021, a copy of the foregoing document has been served by electronic mail on the following: Dylan Borchers at dborchers@bricker.com, Sommer Sheely at ssheeley@bricker.com, Anthony Core at tony.core@squirepb.com, and Jack Van Kley at jvankley@vankleywalker.com.


Travis Bohn