

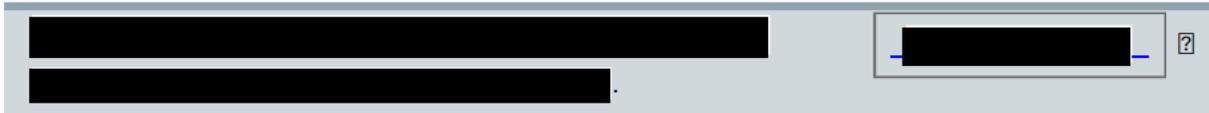
From: [PSC Public Comment](#)
To: [Kassidy from History for the Ages](#); [PSC Public Comment](#); [PSC Consumer Inquiry](#); [PSC Public Information Officer](#); [EEC PSC IT](#)
Subject: RE: Public Comment for Case Number: 2024-00406 - Lost City Renewables LLC
Date: Wednesday, June 25, 2025 12:07:00 PM

Case No. 2024-00406

Thank you for your comments on the application of Lost City Renewables LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2024-00406 in any further correspondence. The documents in this case are available at [View Case Filings for: 2024-00406 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Kassidy from History for the Ages [REDACTED]
Sent: Monday, June 23, 2025 2:56 PM
To: PSC Public Comment <PSC.Comment@ky.gov>; PSC Consumer Inquiry <PSC.Consumer.Inquiry@ky.gov>; PSC Public Information Officer <PSC.Info@ky.gov>; EEC PSC IT [REDACTED]
Subject: Public Comment for Case Number: 2024-00406 - Lost City Renewables LLC



Hello,

I had sent an email on June 11, 2025, that has never been uploaded to a case file. I re-emailed the PSC on June 19 with my public comment, which was also never uploaded. As such, I am resharing it here with multiple email addresses and have also sent a note online about this email (in case these emails are not frequently monitored). Attached, please find my letter regarding Lost City Renewables' proposed solar project for the Dunmor and Penrod communities (case number 2024-00406).

Additionally, please find my C.V. attached to this email. However, if possible, please do not include this with my comment that is publicly visible or at least mark out the information. While I am happy to provide my C.V. to members of the PSC, I would prefer for it not to be accessible to the general public online.

Thank you so much!

Best,

Kassidy

Kassidy Cobb

Founder & Presenter | History for the Ages

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June 7, 2025 (Case #:2024-00406)

Dear Kentucky Public Service Commission:

Pioneers. Soldiers. Doctors. Farmers. Students. Nurses. Teachers. In Dunmor and Penrod, these are just a few faces of residents, past and present. The heritage of Dunmor and Penrod has been celebrated by area residents since the first settlers came here back in the 1700s. Today, that heritage—our unique history—is under fire.

The 1,413-acre solar facility proposed for Dunmor and Penrod is located on quality farmland in forested and residential areas. Because of the area's location and topographical features, a solar complex on this proposed site would be detrimental. I am writing today to share my analyses of three separate studies.

For your convenience and enhanced readability, I have given each section headings and subheadings (where needed), all of which can be found below. As a degreed historian (*summa cum laude* B.S. in History, '24; M.A. in History, '27), I particularly lend my expertise in the historical field to my analysis of the Cultural and Archaeological Reviews. I have been recognized by the Kentucky House of Representatives, Congress, DAR, SAR, DUVCW, and others for my preservation efforts and dedication to the historical field. Because I am trained in historical ethics, I have employed as many unbiases as possible to all of my examinations.

Cemeteries

First, I would like to address the Cultural Resources Analysts, Inc. (CRA) cemetery survey. As a cemetery preservationist for the past eight years, I have ample experience in visiting historic cemeteries around the county and working on preserving these burial grounds through various means (such as maintenance and beautification projects, like placing signs). I would like to point out the Appendix D Cultural Review is grossly insufficient all around because it was simply a windshield study, not a "boots on the ground" survey, and it completely omitted a large burial ground.

Hughes Cemetery

Since the Cultural Review was completed on March 26, 2024, the study in its current form is irrelevant. In late 2024 (months after the Cultural Review was completed), Lost City Renewables added approximately 113 acres to their proposed site, bringing the total project acreage to 1,413 acres. Based on the provided Cultural Review, these additional 113 acres were in no way studied or otherwise surveyed. As such, the cemetery that is located approximately 700 (+/-) feet from 113-acre addition was completely left off of studies: Hughes Cemetery on Forge Mill Road in Dunmor. Hughes

Cemetery boasts pioneer burials dating back to the nineteenth century (the cemetery's sign notes it was established in 1833), as well as veterans' graves (including Union Civil War veterans). According to Find A Grave, the cemetery has over 150 burials, which also makes it significantly larger than many smaller cemeteries dotting the countryside of Muhlenberg County.¹ What is more, the cemetery is more than a walkable outdoor history museum, as it also has burials that are as recent as 2024, with two veteran burials (Walson A. Tooley and Adrian L. DeArmond) in 2021 alone.² During a June 8, 2025, in-the-field survey of Hughes Cemetery, I took numerous photos of the burial grounds and noted unique grave markers, which can be found at the end of this letter (see Fig. 1 to 2.3).

Considering Hughes Cemetery's incredibly close proximity to the proposed solar site—and the fact that it was left off of reviews and the solar company failed to complete a follow-up study—a new Cultural Review that examines Hughes Cemetery is sorely needed. In fact, Lost City Renewables should not be allowed to continue with the application process in any form until such a study has been provided. Both the historical and modern-day individuals who are buried at Hughes Cemetery selected that burial spot for its peace and serenity. Those interred therein—as well as the descendants of pioneers and grieving families of the newly-deceased—deserve to be included in the Cultural Review, with their quiet resting place preserved and maintained against noisy, destructive development.

Welborn Cemetery

What is more, I am perplexed by the statement that both the Welborn and the Wood Cemeteries are “not unique in its age or design compared to other rural cemeteries in Muhlenberg County.”³ While I understand that there are various rules and regulations regarding placing cemeteries on the National Register of Historic Places (NRHP), these cemeteries are nevertheless significant for the area. Specifically, Welborn cemetery is unique because of the prevalence of large sandstone slab markers. While many cemeteries in the area feature a sandstone slab marker or two, few cemeteries of this size have so many sandstone slab markers represented. And—as noted in the report—one of these markers was even fashioned into the shape of a coffin.⁴ This lends both artistic and historical significance, giving visitors a peek into the social views and

¹ Find A Grave lists 159 burials at Hughes Cemetery. That number could be slightly elevated or decreased, given the presence of pioneer burials that may feature unchiseled sandstone. Many cemeteries (Hughes Cemetery could be among them) surrounded by trees have also experienced overgrowth, which means some of the most historic burials are actually hidden among the trees.

² Hughes Cemetery, Find A Grave, <https://www.findagrave.com/cemetery/1963120/hughes-cemetery>.

³ Lost City Renewables, Appendix D Cultural Review, [https://psc.ky.gov/pscecf/2024-00406/tosterloh%40sturgillturner.com/03212025051535/63D Appendix D Cultural Review.pdf](https://psc.ky.gov/pscecf/2024-00406/tosterloh%40sturgillturner.com/03212025051535/63D%20Appendix%20D%20Cultural%20Review.pdf), 2.

⁴ Ibid.

design elements prevalent in the nineteenth and early twentieth centuries. What is more, the Archaeological and Cultural Reviews contradict themselves on both the numbers and ages of graves at Welborn Cemetery.⁵ A new analysis should be required that gives a definite answer to how many graves exist and which ones are the oldest.

Wood Cemetery

Regarding the Wood Cemetery, the survey concludes that the oldest burial belongs to Elias Baker and dates back to 1833. While I would like to point out that this may be the oldest *known* burial (many cemeteries feature unmarked sandstone graves that can be older than those which are inscribed), I must also note that the survey fails to mention Jacob Studebaker, or “Jacob.S.Baker,” as his stone notes. Born in 1766—before America ever even declared independence from British rule—Studebaker shows up in Muhlenberg County tax lists as early as 1800, just two years after the county was formed.⁶ Besides being an early pioneer, Studebaker was also “sworn a Grand Jury for a body of this [Muhlenberg’s] Circuit [court]” sometime around 1803.⁷

The survey posted by Lost City Renewables notes that the Wood Cemetery rests on “a grassy ridge overlooking the proposed project area,” with the most recent burial dating all the way up to 2020.⁸ The fact that Wood Cemetery is “overlooking” the proposed solar project is troubling. Given the cemetery’s significance and its ties to pioneers who were involved with the county courts so soon after the county was established, altering the viewshed of the cemetery would be detrimental to its historical value. Although the current view has almost certainly changed since the early 1800s, the viewshed still features woods and the same rolling terrain that these early pioneers would have known and trod on. Removing the timber and grading the hills would result in complete and utter destruction of the view that likely inspired these pioneers to make the lush ridge their final resting place.

KRS 525.115 points out that violating graves is a Class D felony, and violations include when anyone “Mutilates the graves, monuments, fences, shrubbery, ornaments, grounds, or buildings in or enclosing any cemetery or place of sepulture...”⁹ As a historian who truly believes that cemeteries are pieces of history—literally an outdoor museum—I am thankful that these laws are set in place to offer a form of protection.

⁵ Page 6 of the Archaeological Review notes the presence of 37 grave markers, while the Cultural Review (p. 19) states there are “approximately 20 burials.” The Archaeological Review lists A.E. Welborn’s January 14, 1860, grave as the oldest (p. 6), but the Cultural Review says Milton M. Welborn’s June 11, 1887, marker is the oldest (p. 19).

⁶ Studebaker’s tax list was found among historical records published on Ancestry.com.

⁷ Otto Rothert, *A History of Muhlenberg County*, (Louisville KY: J.P. Morton, 1913), 52.

⁸ Lost City Renewables, Appendix D, 2.

⁹ Kentucky Laws, <https://anthropology.as.uky.edu/sites/default/files/KY-Laws.pdf>, 14.

However, I would argue that altering the viewshed of historic burial grounds, surrounding them in black solar panels (as would be the case for Welborn and possibly Hughes Cemetery), creating increased disturbances (both installation crews and noise of inverters when the project would be operational), or leaving a cemetery off of a site survey entirely is another, more dangerous, form of violations. Unfortunately, these violations are not the removal of flowers or flags on one's graves. While those violations are abominable, the previously mentioned construction proposed by Lost City Renewables would create permanent damage to cemeteries' viewsheds and a loss of peacefulness that is irreversible.

Archaeology

Just like the Cultural Review, the Archaeological Review is inadequate because it only studied 1,300 acres, which means the approximately 113 acres that were later added to the project were left off of the review. Considering the findings within the Archaeological Review (as noted in the forthcoming paragraphs), the 113 acres that were not surveyed should be examined in order for Lost City Renewables to meet all rules/regulations, as well as the ethics and practices of the archaeological/historical communities as a whole.

Methodologies & Native American Evidence

Interestingly, the Archaeological Review provided by CRA details just how insufficient all previous studies—with which the new study was largely based upon—are. In fact, the only archaeological survey that “falls within the boundaries of the current study area” took place in 2004, which means that it “may not have employed methods that meet the current State Historic Preservation Office (SHPO) specifications.”¹⁰ Because the only previous survey was completed over 10 years ago (well before GPR, LiDAR, and space archaeology were widely used in the field), it is imperative that the PSC demand for—as CRA put it—these areas to “be revisited and surveyed using presently accepted methods.”¹¹

Even while only walking some parts of the area—without the use of GPR, LiDAR, or digging test pits—archaeologists found compelling evidence of the land's historical significance. Apparently, three prehistoric flakes were found, which means it is “possible more artifacts are present in this area, and if a survey were to be conducted, a site would

¹⁰ Lost City Renewables, Appendix E Archaeological Review, https://psc.ky.gov/pscecf/2024-00406/tosterloh%40sturgillturner.com/03212025051535/63E_Appendix_E_Archaeological_Review.pdf, 3.

¹¹ Ibid.

likely be encountered here and in other areas of similar topographic setting.”¹² The review’s conclusion reiterates the prevalence of ancient artifacts, noting: “It is likely that more artifacts are present in this area, and if a survey were to be conducted, a site would likely be documented here and possibly in other areas of similar topographic setting.”¹³ The soil data, too, indicates that the area potentially contains “deeply buried archaeological deposits.”¹⁴ Based on these statements from trained archaeologists, further examination would certainly be warranted before any type of development ever moved forward, as the area may very well contain a slew of Native American and prehistoric artifacts.

Even a study completed in 1982 (again, well before modern methodologies enhanced what archaeologists could find), local Site 15Mu133 was “recorded as a multicomponent rockshelter containing Late Archaic and Early Woodland components, along with a historic pine tar kiln base dating from 1851 to 1950.” Although no report by researchers and archaeologists was ultimately produced, it was determined that Site 15Mu133 was “eligible for NRHP inclusion, but was not nominated by SHPO.”¹⁵ Because other area excavations have determined that ancient and more modern sites alike are prevalent and eligible for NRHP recognition, I do not doubt that sections of the 1,413 acre proposed solar site could also be eligible for NRHP inclusion, if proper and detailed studies were conducted.

As a Dunmor resident from c. 2004-present and now a degreed/trained historian, I can vouch first-hand that the area is culturally significant. I know people who live on properties adjoining the proposed site have unearthed flint, arrowheads, and rock-based Native American tools—all from tilling up part of their land to plant a garden. Given the widespread Native American artifacts that have already been found by farmers and landowners, I have no doubt that a team of archaeologists—with the proper equipment, training, and ability to dig deeper—could unearth ancient arrowheads, tools, effigies, religious items, or other artifacts that offer insight into the tribes who once called the region home.

Because the Native American Graves Protection and Repatriation Act demands that “Federal agencies and museums, universities, state agencies, local governments, or any institution that receives Federal funds...comply with NAGPRA,” it is important to ensure that an out-of-state and out-of-country company is not allowed to destroy Native American artifacts or potential burial sites.¹⁶ Since the proposed solar site features hills

¹² Lost City Renewables, Appendix E, 6.

¹³ Ibid.

¹⁴ Ibid., 3.

¹⁵ Ibid.

¹⁶ National Park Service, Native American Graves Protection and Repatriation Act, <https://www.nps.gov/subjects/nagpra/compliance.htm>.

and rolling terrain, I would be completely unsurprised if some of these so-called hills are actually remnants of Native American burial mounds.

As early as 1913, Muhlenberg County historian Otto Rothert took note in his history book of prehistoric structures in the county, sharing a picture of a Native American-built mound outside of Greenville that—even in photos—resembles a small hill.¹⁷ If there is even a chance (which there certainly is) that mounds hand-crafted by Native Americans or housing burials of their people would be slated for grading, swift action must be taken. While it is impossible to reverse the damages caused to Native Americans and their tribal land, all actions possible should be taken to ensure additional, irreparable damage to Native Americans' heritage is halted.

Railroad Culvert

The Cultural Review notes that a railroad grade and cut limestone culvert is “located within the proposed project area on an approximately 260.3-acre parcel that includes forested areas and agricultural fields.”¹⁸ Per the review, the grade and culvert are at least 150 years old, which is representative of the boom in industry (and the railroad itself) at the close of the American Civil War in 1865. Although CRA notes the “evaluation of the entire line of the abandoned railroad is beyond the scope of the current overview survey,” they do mention that the “stone culvert and railroad grade at CRA 3 is considered potentially significant for its association with the Elizabethtown & Paducah Railroad and later the Louisville and Nashville Railroad.”¹⁹ What is more, CRA goes on to note: “The culvert is also potentially significant as an excellent example of a stone railroad culvert.”²⁰

CRA's admittance that the railroad's historical significance is two-fold should certainly be taken into account, with steps taken to ensure that this piece of history is not forgotten. Since the railroad was also connected to the Elizabethtown and Paducah Railroad, as well as the Louisville and Nashville Railroad, this historical feature's significance stretches well beyond Muhlenberg County. Additionally, CRA's statement that the culvert is an *excellent* example of a stone railroad culvert gives testament to the importance of the culvert within the greater historical context of Muhlenberg County, the region, and travel history as a whole.

Based on historical records, Dunmor was a bustling town when the railroad came through, with the depot becoming “a shipping and receiving point” with two trains that

¹⁷ Rothert, *A History of Muhlenberg*, 427.

¹⁸ Lost City Renewables, Appendix D, 22.

¹⁹ *Ibid.*, 24.

²⁰ *Ibid.*

“passed through daily.”²¹ Because of the railroad’s presence, Dunmor became a bustling railroad town around the turn of the century, boasting tobacco factories, a saw mill, grist mill, livery stable, jail, whiskey distillery, newspaper, post office, and physician.²² Even coal trains were going through Dunmor daily, and a “new spur track was built for the ten or so miles from Penrod to Mud River Mines as the coal market improved” at the century’s turn.²³ The railroad also offered ease of travel in the days before automobiles and planes—“It was a great arrangement for travelers and shippers.”²⁴

To remove this railroad culvert for a solar complex is to eliminate an important piece of Dunmor’s and Penrod’s history. In an era where the old stores along Dunmor’s main street are long-gone, railroad culverts and other similar pieces of history are all residents have left to remember those who lived on the same lands we now do. When a piece of history is gone, it cannot be brought back. As a historian who has mourned the loss of historic structures locally, state-wide, nationally, and globally, I do not wish for present and future Dunmor/Penrod citizens or other Kentuckians to feel the same way. Protecting both ancient and modern sites from development—no matter the development type or scope—is important for keeping our shared heritage intact.

Property Impacts

Kirkland’s Studies

As a historian, a large part of my everyday life—from work to graduate school assignments—encompasses researching. As I’ve been researching Kirkland Appraisals, LLC, I’ve found that the company appears to lack the reputability needed to provide trustworthy, reliable appraisals. First, on the list of services Kirkland shares on his website, he notes that he appraises for residential subdivisions, industrial buildings, office buildings, shopping centers, retail buildings, solar farms, and a slew of other development-related industries.²⁵ The common denominator for all of these property types is the need for positive property value studies (specifically ones that show no negative impacts) in order for planning and zoning or state commissions—such as the PSC, in Lost City Renewables’ case—to approve the project. This, coupled with the fact that Kirkland is paid by these development companies for his studies, works to lower Kirkland’s ability to be fully unbiased in his reviews. Of course, the simple, uninspiring language used within the report (like “Very similar solar farms in very similar areas”)

²¹ Paul Camplin, *A New History of Muhlenberg County*, (Greenville, KY: Caney Station Books, 1984), 48.

²² *Ibid.*

²³ *Ibid.*

²⁴ *Ibid.*

²⁵ You can find Kirkland’s full list of services here: https://kirklandappraisals.com/?page_id=380.

and outrageously absurd statements (such as the conclusion’s mention of reduced traffic and dust, both of which a simple visit to another solar facility—like Robards in Henderson County—can verify as an untrue statement) also lower Kirkland’s trustworthiness.

What is more, Richard Kirkland employs four individuals, three of which also bear the last name Kirkland. Nick Kirkland holds a B.A. in Communication (2018), but he has been a Kirkland Appraisals employee since 2015—three years before he ever received his degree. Researcher Connor Kirkland’s only work experience is at Kirkland Appraisals. Per his brief biography, Connor “gathers public documents and makes maps” and is a full-time college student.²⁶ Meanwhile, Courtney Kirkland is listed as a part time researcher since 2023 who “gathers public documents and maps and helps to maintain the database.” Swarna Chandrashekar, the only employee listed on the Kirkland Appraisals’ website without the same last name as the company, is a trainee appraiser with an MBA from India.

Although I am certainly a proponent of supporting family-run businesses, Kirkland Appraisals is crafting reports that can forever alter entire communities, which is vastly different from a mom-and-pop ice cream shop or rural country store. Additionally, I think it’s wonderful when young people—even those who have not yet graduated from high school or college—are members of the work force. However, Kirkland Appraisals (as previously illustrated) has a proven track record of hiring uncredentialed young people to research and/or help build reports. Although I have been active in the historical field for a decade, I waited until obtaining a B.S. in History before I began giving historical presentations to libraries and genealogical/historical societies across the country. Essentially, I recognized how important credibility is within certain roles, and I knew that I did not always bear the credentials needed to garner respectability in my field. I would hope that larger businesses like Kirkland Appraisals would feel the same. Unfortunately, based on the information shared online, it seems that Kirkland Appraisals is staffed by young people who have not yet gained the experience and credentials that should be needed to build reports for multi-million-dollar development companies.

Most startling, however, are the “studies” provided by Kirkland Appraisals. As I’ve been investigating different appraisals that Kirkland completed, it only took me about five minutes and a quick Google search to find four conclusions that—save for slight variations in the first paragraph—are identical. In fact, Lost City Renewables’ 1,413-acre solar project bears the same conclusion as Volcano Energy (153 acres), Wheelhouse Solar (602 acres), and Enon Road Solar (32 acres). This begs the question: how can a reputable, trustworthy study yield the same conclusion for three projects of

²⁶ You can review all of Kirkland’s employees here: https://kirklandappraisals.com/?page_id=25.

varying sizes that are in different locations? What is more, how is it possible that “The adjoining properties are well set back from the proposed solar panels,” regardless of whether the setbacks are unstated (Fig. 2.3, 2.4, 2.6) or the setbacks are 1,156 feet from the nearest panel (Fig. 2.5). Essentially, if the exact same conclusion is reached each time, it does not matter if a study is 10 pages or 1,010...the final presumptions are unchanging.

Quite frankly, while there are various pieces of evidence indicating that Kirkland Appraisals is not offering reliable, transparent appraisals, the conclusions’ exactness raises questions and additional concerns. Even when I am crafting papers for school or work that are on somewhat similar topics, my conclusion is ever-changing based on the primary sources and evidentiary documents I find. Indeed, I cannot imagine how a company offering appraisals—or any service, for that matter—would be able to reach the same conclusion for multiple projects when the variables are changing. (Please find comparisons of the conclusions in Figures 2.4 to 2.7 at the bottom of this letter.)

Negative Property Value Impacts

Although Richard Kirkland assures four different solar facilities—using the same language and verbiage—that solar sites have no negative impacts on property values, reputable studies suggest the opposite is the case. In fact, Louisiana’s House Committee on Agriculture, Forestry, Aquaculture, and Rural Development and their House Committee on Natural Resources and Environment tasked Louisiana State University’s (LSU) Center for Energy Studies to “conduct a literature search on the potential effect of utility-scale solar development on adjacent property values.”²⁷ The review, conducted in August 2024, used other recent property value assessments of solar facilities’ impacts on housing in other regions.

A study that took place in Central Florida concluded there is a “6.9% reduction in housing values within 750 meters (~1/2 mile) of solar.”²⁸ Meanwhile, a Massachusetts and Rhode Island review found a “2.5-5.8% reduction in housing values within 0.6 miles of solar. (Rural estimate).”²⁹ A review conducted in 2023 that included six states (California, Connecticut, Massachusetts, Minnesota, North Carolina, and New Jersey) found that homes in rural areas—such as the homes in both Dunmor and Penrod—saw a 4.2% reduction in property values within 0.5 miles of the project, a sum that’s

²⁷ Greg Upton and Sarang Talpur, “Literature Review on the Impact of Utility-Scale Solar on Housing Prices,” August 2024, https://www.lsu.edu/ces/publications/2024/solar_energy_and_housing_prices_lit_review_aug_30_2024.pdf, 1.

²⁸ Ibid., 2.

²⁹ Ibid.

significantly larger than the 1.5% reduction in non-rural areas.³⁰ Other studies in England and Wales and the Netherlands noted a 5.4% and 2.6% reduction, respectively.³¹

While a 2023 study of solar facilities in North Carolina (carried out by Abashidze and Taylor) found “no direct positive or negative spillover effects of utility-scale solar farms on agricultural land value,” LSU noted that the analysis “does not consider residential houses.”³² **As such, to use this study to determine that large-scale solar complexes have no impact on residential home values is not accurate.** Interestingly, Kirkland cites Abashidze’s study on page 24 of his property value assessment, using the study (which apparently is not intended to evaluate residential home values) to assert a “finding of no impact on adjoining agricultural property values.”³³ Manipulating the findings of Abashidze’s study further, Kirkland goes so far as to note, “in some cases [solar facilities] could support a modest increase in value.”³⁴

Louisiana State University—based on their findings—state in their conclusion: “Empirical estimates suggest a reduction of 1.5% - 6.9% in housing values.”³⁵ It is important to note that the various studies LSU analyzed typically noted that property value reduction in rural regions is higher. For one study, property reduction “is particularly significant in rural areas, where the installation of solar arrays on farm and forest lands impacts the open space and rural character that contribute to the desirability of these locations.”³⁶ Meanwhile, another survey LSU examined found that property reduction “is particularly evident in rural regions, on agricultural land, and near larger solar developments.”³⁷ What is more, another study “estimate[s] a 5.4% reduction in properties located within 750 meters south of an operational solar farm greater than 5 megawatts in capacity.”³⁸

Considering the 1,413-acre solar facility proposed for the rural communities of Dunmor and Penrod is 250 MW (much larger than 5 MW), located in a rural region (on forested lands/agricultural fields), and would be a large-scale solar development, all of the previously cited studies indicate that substantial decreases in nearby landowners’ property values could be expected.

³⁰ Upton and Talpur, “Literature Review,” 2.

³¹ Ibid.

³² Ibid.

³³ Kirkland and Lost City Renewables, Appendix A Property Value Study, https://psc.ky.gov/pscecf/2024-00406/tosterloh%40sturgillturner.com/01292025030138/3A_Lost_City_Appendix_A_Property_Value_Study.pdf, 24.

³⁴ Ibid.

³⁵ Upton and Talpur, “Literature Review,” 3.

³⁶ Ibid., 1.

³⁷ Ibid., 1-2.

³⁸ Ibid., 2.

Conclusion

As I consider all of the potential ramifications of a 1,413-acre industrial solar complex installed in the rural communities of Dunmor and Penrod, the possible negative outcomes are overwhelming. From increased traffic on small, one-lane winding roads (like Mason Poyner and Forgy Mill Roads) and amplified noise levels during construction and operation (which is particularly harmful for the many essential workers—like nightshift nurses—who would be trying to sleep during the construction hours) to the fact that our area has already endured multiple severe weather events (flooding, tornadoes, hail, etc.), this project stands to be highly detrimental to the area.

Beyond these issues, Lost City Renewables has repeatedly proven that they are untrustworthy and unreliable. Although KRS 278.704(6)-(8)³⁹ details the requirements of public meetings upon request, developer Sean Joshi apparently told 14 News: “they [Lost City] didn’t even have to hold a meeting, but they did to collect feedback to do what they can to be a good neighbor.”⁴⁰ Repeatedly, Lost City Renewables’ team is unable to sufficiently answer questions (the most recent May 5 meeting was held in a highly controlled environment) and is dismissive of area residents’ concerns (a local project representative even asked one Dunmor resident why they care if the solar facility is installed anyway). Over and over again, Lost City Renewables has proven that being a “good neighbor” is merely a marketing gimmick—not a lived-by mission statement or legitimate priority.

Based on all of these issues, the lack of Hughes’ Cemetery’s inclusion in the Cultural Review, the 113 acres that were not surveyed in the Archaeological Review, and the impact to property values as revealed in multiple property value assessments, I strongly encourage the Public Service Commission to deny Lost City Renewables’ request to install a destructive 1,413 acre solar energy complex in the forested, agricultural, and residential communities of Dunmor and Penrod. After all, as juris doctorate candidate Layton Coker said: “Decades ago, Mr. Peabody’s coal train ‘hailed away’ the town of Paradise; now, TVA must ensure that clean energy does not haul away what is left.”⁴¹

³⁹ Kentucky Revised Statutes, 278.704,

<https://apps.legislature.ky.gov/law/statutes/statute.aspx?id=54023>.

⁴⁰ Liz DeSantis, “Public hearing held to talk over proposed solar farm in Muhlenberg Co.,” <https://www.14news.com/2024/10/29/public-hearing-being-held-talk-over-proposed-solar-farm-muhlenberg-co/>.

⁴¹ Layton Coker, “Paradise Lost: Environmental Justice Gaps in TVA’s Clean Energy Transition,” <https://www.tba.org/?pg=Hastings2025FirstPlace>.

Evidentiary Pictures & Documentation



Figure 1: A view of Hughes Cemetery, featuring the sign that notes the cemetery's establishment in 1833.



Figure 1.1: A unique grave marker containing a message from a parent to their son on the grave marker's reverse.



Figure 1.2: A picture of Josie Boatwright's grave that dates to 2024, complete with an image of Josie and her husband.



Figure 1.3: A view of the cemetery that shows a mix of modern and historic grave markers, as well as serenity of the current surroundings.



Figure 1.4: An image of two grave markers that are culturally significant for the images depicted upon the stones. The marker at left features a guitar and a cowboy hat atop boots, while the figure at right shows a guitar pick with music notes, a guitar, and the deceased's name within the pick. These markers are indicative of the unique musical heritage Muhlenberg County boasts, with musical greats like Merle Travis and the Everly Brothers having strong Muhlenberg roots.



Figure 1.5: Another view of Hughes Cemetery, showing additional modern and historic grave markers (as well as the rural, quiet, and unindustrialized setting).



Figure 1.6: The Hughes Cemetery includes many veteran burials, such as World War II veteran Melvin Ray Arnold.



*Figure 1.7: A photo of James Wood's (1841-1940) grave marker. Wood is significant because he fought for the Union during the Civil War and was an older surviving Civil War veteran, living all the way up to 1940. Historian Otto Rothert said of James Wood: "One of the sons of Zillman Wood is James Willis Wood, a Federal soldier, who was born in 1841 and **who all his life did much for the good of the county.** Among the sons of J. W. Wood is Ed S. Wood, who was county clerk from 1898 to 1906."*

(<https://archive.org/details/historyofmuhlenbooroth/page/18/mode/2up?q=%22James+Wood%22>, page 18)



Figure 1.8: In keeping with the tradition of many veteran burials (that span multiple times/eras of conflict and peace), Walter McPherson, a World War I veteran, is also interred at Hughes Cemetery.



Figure 1.9: A simple hand-carved and hand-chiseled marker that dates back to the 1850s. Headstones like these are significant because they offer a glimpse into the socioeconomic culture of the region. Although the deceased's family was likely economically disadvantaged—and thus unable to purchase a professionally-crafted and ornately decorated marker—their connection to the deceased and dedication to remembering them inspired the creation of these types of stones.



Figure 2: James Tooley's marker is important because it was provided by the "Modern Woodman of the World" and is designed to resemble a log.



Figure 2.1: A view of the woods that are partially surrounding Hughes Cemetery, which is set back off the road to provide maximum peace and a rural/country atmosphere.



Figure 2.2: A portion of the cemetery overlooks a pasture and rolling hills that are covered in trees. Since Hughes Cemetery was not included in the Cultural Review or Archaeological Review, a new survey should be conducted on the additional 113 acres of the proposed solar site to ascertain how the viewshed and cemetery's serenity would be impacted.



Figure 2.3: This map illustrates the approximate proximity (721.5 feet, +/-) of the Hughes Cemetery to the additional 113-acre tract of land leased by Lost City Renewables (Harold Gardner’s farm, as highlighted). Based on this map, it is reasonable to presume that Hughes Cemetery’s viewshed would be impacted by the solar facility’s installation and that construction and operational noise would be audible from Hughes Cemetery. The grove of trees circled in red on the map (and within the cemetery’s view) may also be slated for removal, which would further alter the cemetery’s viewshed and serenity.

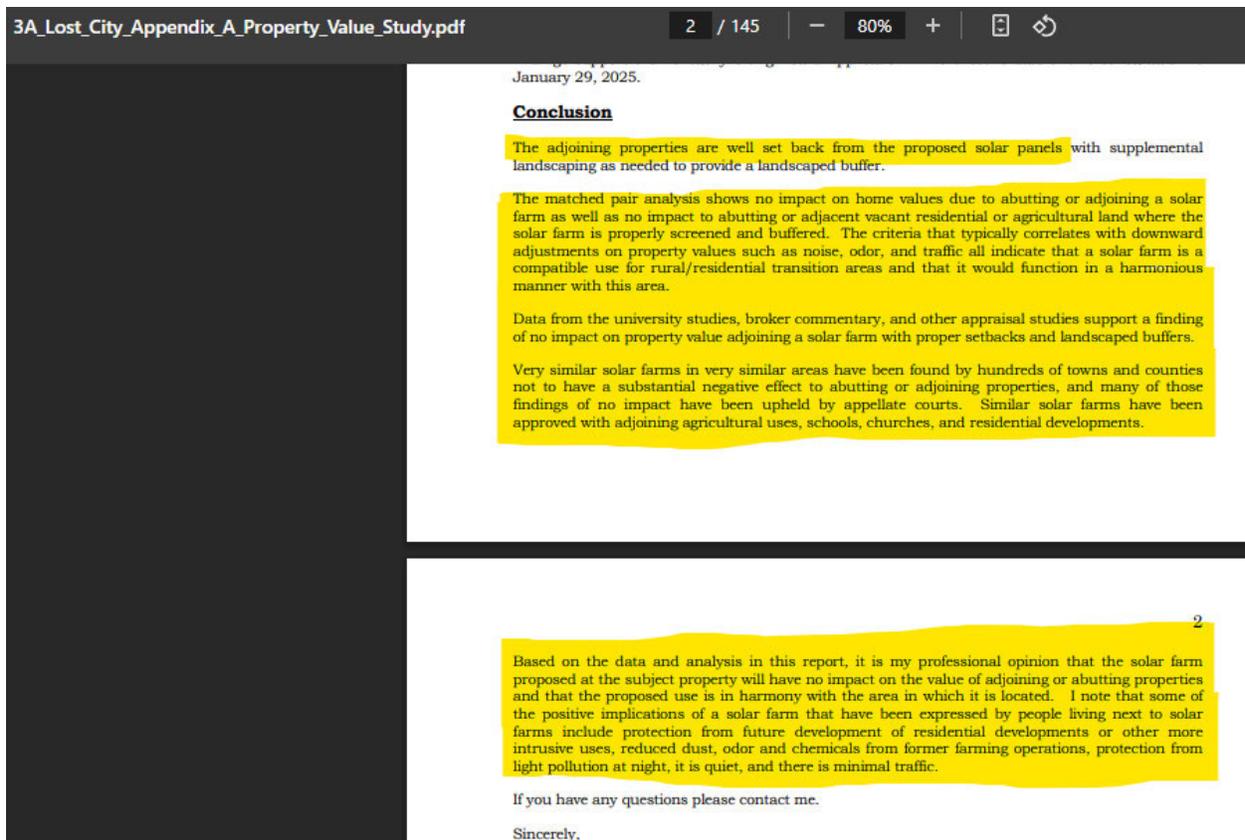


Figure 2.4: Lost City Renewables' Property Value Study, as provided by Kirkland, features a conclusion that—save for slight variances in the first paragraph (unhighlighted)—is the same as three other studies completed by Kirkland.

([https://psc.ky.gov/pscecf/2024-00406/tosterloh%40sturgillturner.com/01292025030138/3A_Lost_City_Appendix A_Property_Value_Study.pdf](https://psc.ky.gov/pscecf/2024-00406/tosterloh%40sturgillturner.com/01292025030138/3A_Lost_City_Appendix_A_Property_Value_Study.pdf))

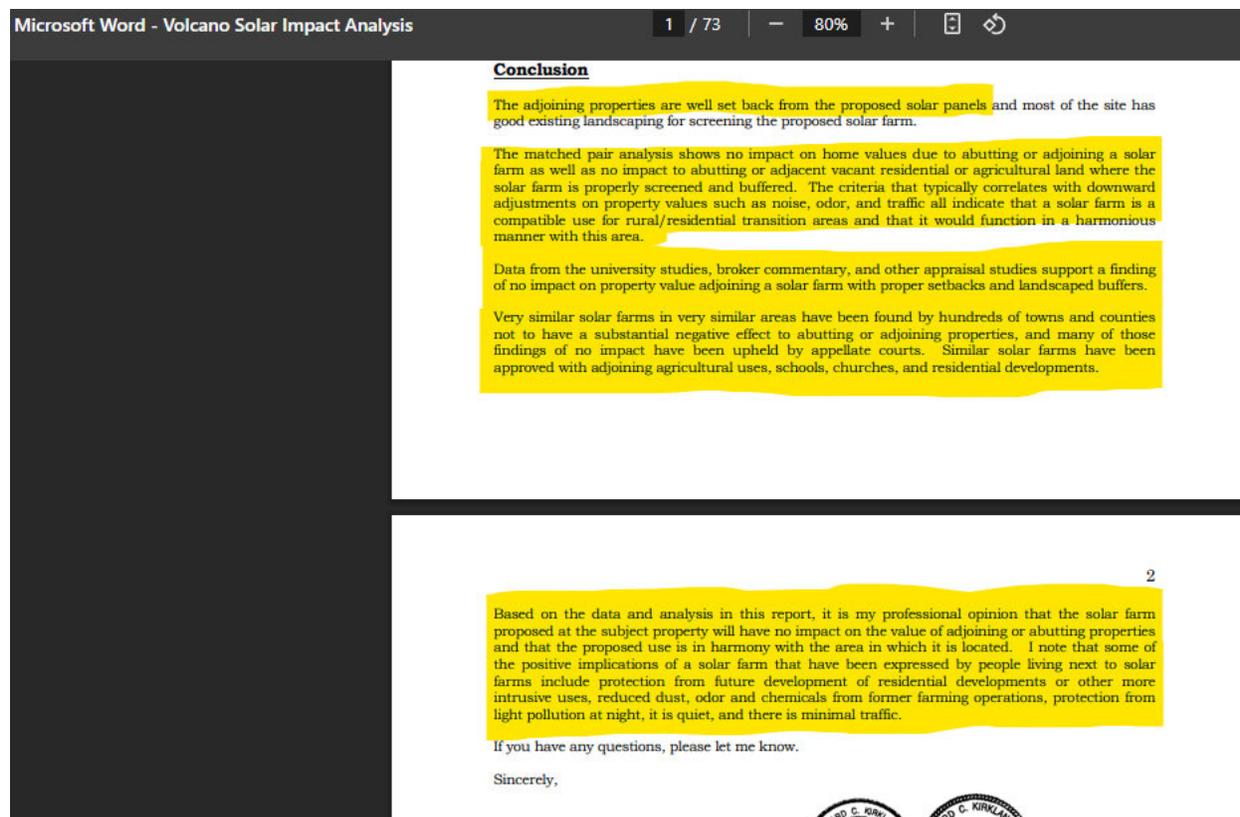


Figure 2.5: Volcano Energy (who proposed to install a 153.22 acre solar facility in Rockbridge County, Virginia) received a property value impact study from Kirkland bearing a conclusion that—besides a slight variance in the first paragraph (unhighlighted)—is identical to the review provided to Lost City Renewables. (<https://aspenpower.com/wp-content/uploads/2024/01/Volcano-Solar-Impact-Analysis.pdf>)

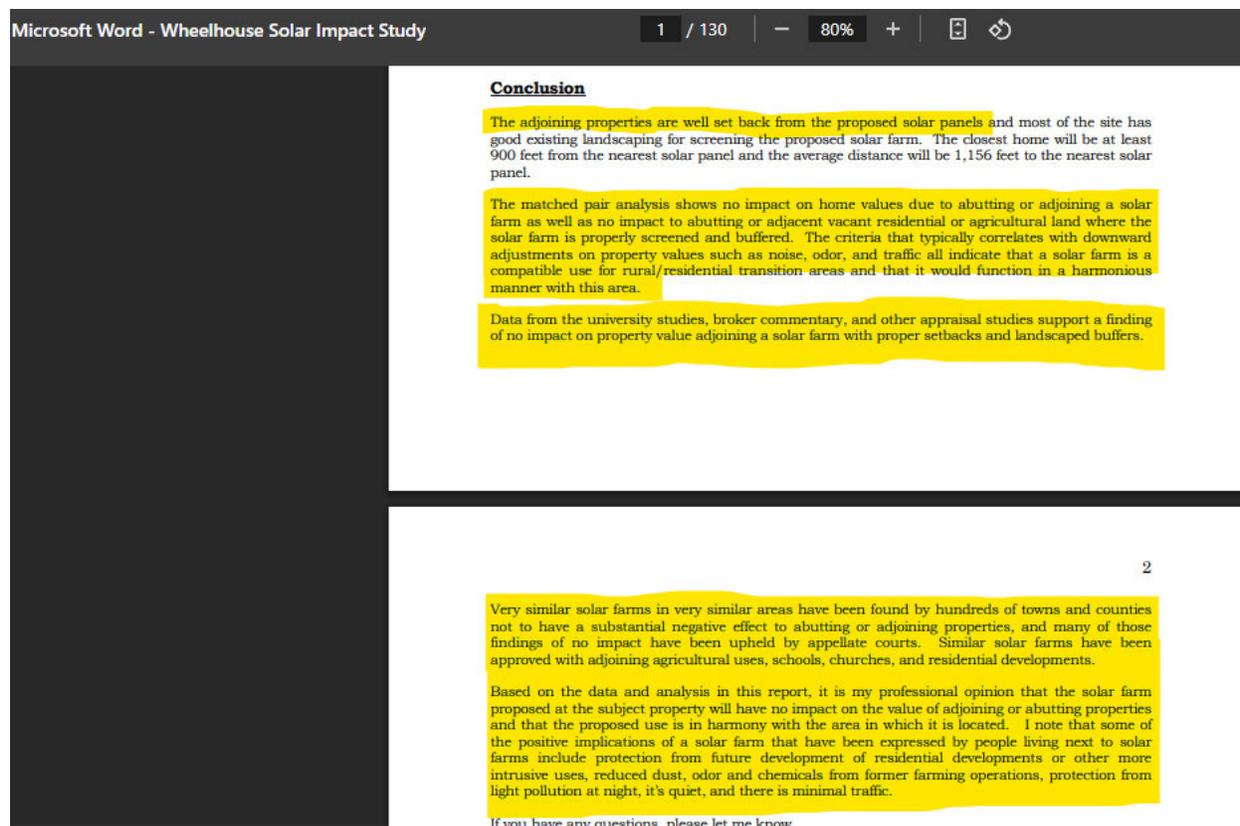


Figure 2.6: Wheelhouse Solar (who proposed to install a 602.88 acre solar facility in Lunenburg County, Virginia) received a property value impact study from Kirkland with a conclusion that—besides a slight variance in the first paragraph (unhighlighted)—is identical to the review given to Lost City Renewables and Volcano Energy. (<https://www.pd46energy.com/wp-content/uploads/2022/09/Wheelhouse-Solar-Impact-Study-7-25-22.pdf>)

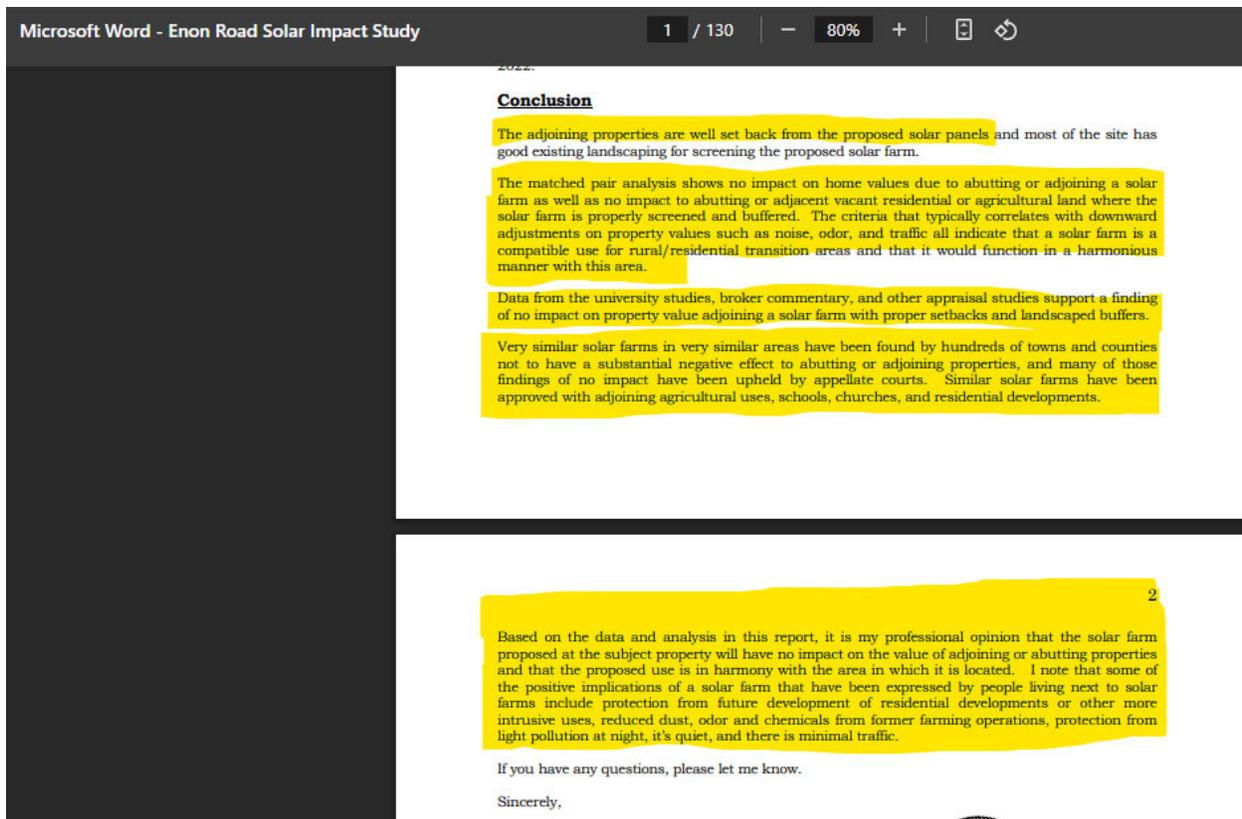


Figure 2.7: Enon Road Solar (who proposed to install a 36.76 acre solar facility in Stafford County, Virginia) received a property value impact study from Kirkland featuring a conclusion that—besides a slight variance in the first paragraph (unhighlighted)—is identical to the review given to Lost City Renewables, Volcano Energy, and Wheelhouse Solar.

(<https://cdn.staffordcountyva.gov/planning%20and%20zoning/development%20review%20meetings-applications/september%202022/5%20property%20value%20impact%20study%20enon%20road%20solar.pdf>)

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