

David L. Hawkins

190 Cane Run Cemetery Road

Munfordville, Ky 42765

RECEIVED

SEP 05 2025

PUBLIC SERVICE
COMMISSION

September 1, 2025

Kentucky State Board on Electric Generation and Transmission Siting

211 Sower Boulevard

P.O. Box 615

Frankfort, Ky 40602

Re: Opposition to Wood Duck Solar, LLC Project (Case No. 2024-00337)

Dear Members of the Siting Board,

I am writing to ask you to address deficiencies in Wood Duck's **Responses to Siting Board Staff's Second Request for Information**. Specifically, more attention should be given to their responses to Request No. 8 and Request No. 16.

Item c. of Request No. 8 asks Wood Duck to "Explain what permits Wood Duck Solar will need to acquire in relation to endangered species". Their response was "No permits from USFWS are anticipated". Item d. of Request No. 8 asks Wood Duck to "Explain if the site layout will be revised in any way as a result of the location of the endangered species". Wood Duck replies that "There is no documentation of endangered species within the Project area". I am enclosing a map published by USFWS that shows known Indiana bat habitat in Kentucky. The Project area clearly is in Known Summer and Swarming habitat. Shouldn't Wood Duck be required to address the danger to the Indiana Bat with USFWS? Could it be that Wood Duck says there is no documentation of endangered species because they have chosen not to look for it? Wood Duck should be required to comprehensively address dangers to the Indiana Bat and other endangered species impacted by their proposed project.

Item b. of Request No. 16 asks that Wood Duck "Provide a response to the commentor's concerns regarding impacts to property values as related to the referenced University of Wyoming Study". I was the commentor at the July 15, 2025 hearing and on August 18, 2025 included a complete copy of the study in my letter of opposition addressed to the siting board. Apparently, Wood Duck is not reading

the public comments or their response would have been different from stating "The referenced public comment does not include a copy of the research or publication. Despite the efforts of Wood Duck and its counsel, the referenced research is not publicly available". A simple Google search provides the entire document authored by Nino Abushidze. Wood Duck has obfuscated and tried to artfully dodge addressing the request of Siting Board Staff. This should not be allowed and is another example of how Wood Duck is trying to bypass critical issues and questions concerning the glaring deficiencies that exist in their project. It should also be pointed out that Kirkland's work has not been peer reviewed.

So, as an adjacent landowner, I implore you to deny Wood Duck Solar's application based on its myriad deficiencies and negative impact on Barren County and its citizens. Thank you for your consideration.

A handwritten signature in blue ink, appearing to read "David L. Hawkins", with a stylized, flowing script.

David L. Hawkins

enclosures



U.S. Fish & Wildlife Service

Known Indiana bat habitat in Kentucky and within 20 miles (August 2019)

LEGEND*

Sensitive Areas – work in these areas requires site-specific coordination with the KFO

Known Summer 1 + Swarming 1 habitat

Known Summer 1 + Swarming 2 habitat

Known Summer 2 + Swarming 1 habitat

Known Summer 2 + Swarming 2 habitat

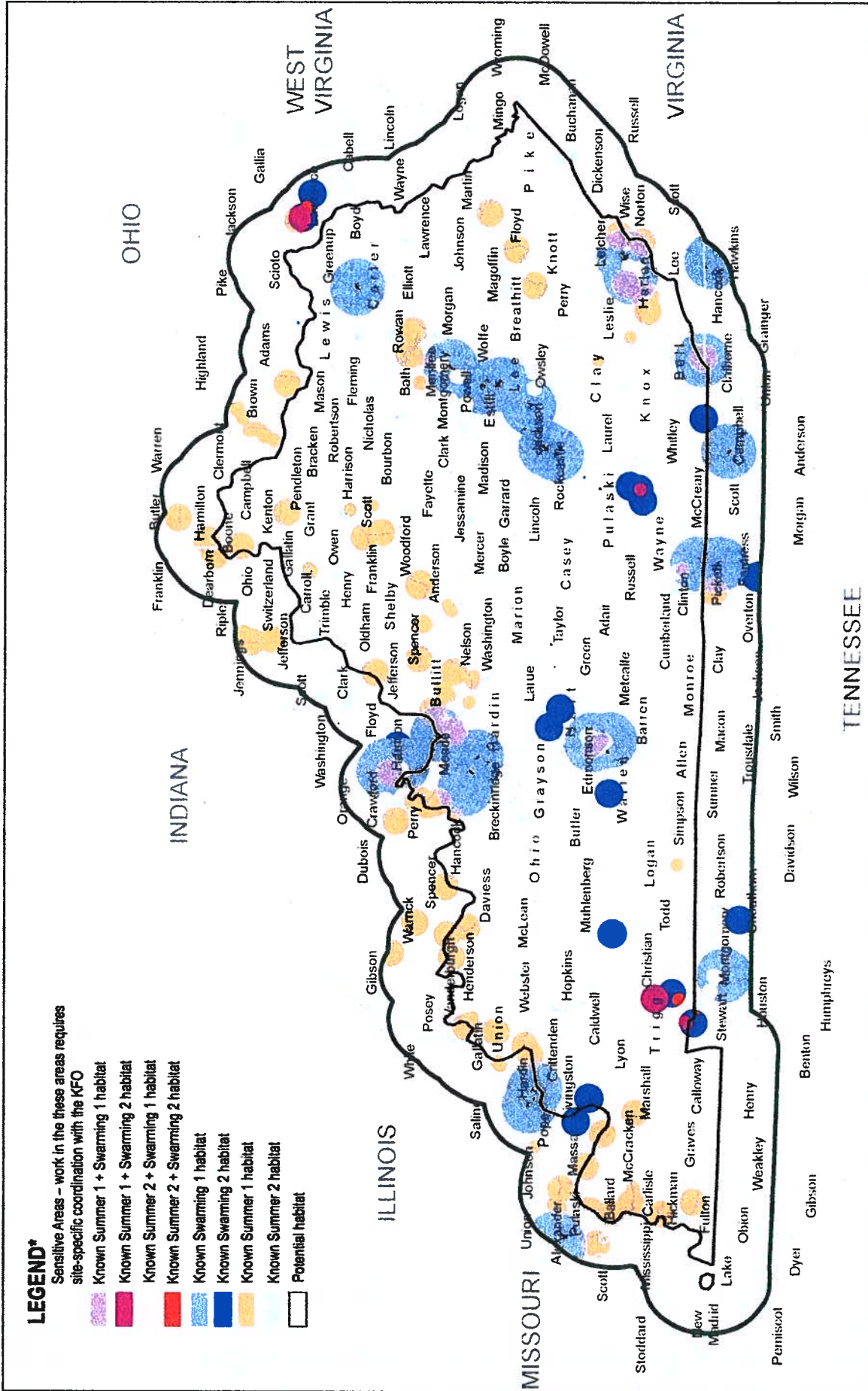
Known Swarming 1 habitat

Known Swarming 2 habitat

Known Summer 1 habitat

Known Summer 2 habitat

Potential habitat



NOTE: This map is based on species occurrence information and is subject to change as new data becomes available. Please contact our office at 502-695-0468 to ensure you are working with the most current version.

*For an explanation of terms, please see the Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky.

The USFWS makes no warranty for use of this map and cannot be held liable for actions or decisions based on map content. This map was produced as an appendix to the Conservation Strategy for Forest-Dwelling Bats in the Commonwealth of Kentucky and should only be used in the context of this Strategy.



Datum: NAD 83

Wood Duck Solar LLC
Responses to Siting Board Staff's Second Request for Information
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Request No. 8:

Refer to Wood Duck Solar's response to Staff's First Request, Item 33, Attachment Part 3, page 541. The Critical Issues Analysis report states there are "two (2) federally endangered species, seventeen (17) state-endangered species, twenty (20) state-threatened species, and one (1) federal candidate species that have the potential to occur within the Project area. Additionally, the Project area is within two critical habitat units for the Indiana bat." Provide the following::

- a. Describe the mitigation measures Wood Duck Solar will adopt to protect these endangered species.
- b. Explain what communication has occurred with United States Fish and Wildlife Service (USFWS). Provide summaries or documentation to support the response.
- c. Explain what permits Wood Duck Solar will need to acquire in relation to endangered species.
- d. Explain if the site layout will be revised in any way as a result of the location of the endangered species.

Response:

- a. The Project will participate in the Imperiled Bat Conservation Fund program for loss of forested habitat and will restore the land with native grass and pollinator species.
- b. Please refer to the response to RFI 1-42. Project representatives met with National Parks Service (NPS) staff at Mammoth Cave National Park in June 2025 to discuss the potential impacts from the Project on Mammoth Cave and the Kentucky Cave Shrimp. NPS staff opined that development of the proposed Project would not negatively impact the Mammoth Cave watershed or the Kentucky Cave Shrimp. Additionally, a formal IPAC request was submitted and a review letter was received stating the Project would have no

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effect to listed species. The USFWS only consults on federally listed threatened or endangered species.

c. No permits from USFWS are anticipated.

d. There is no documentation of endangered species within the Project area.

Responding Witness: Chad Martin

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Request No. 16:

Refer to the public comment titled 20250721_Multiple Public Comments.pdf filed on July 21, 2025, pages 7–15.

- a. Provide a response to the commentor's interpretation that glare will be greater at specific residences than stated in the conclusion of the Applicant's Glare Hazard Analysis.
- b. Provide a response to the commentor's concerns regarding impacts to property values as related to the referenced University of Wyoming Study.
- c. Provide the addresses for the four residences on Oak Grove Church Road that will experience green glare during Project operations.
 1. Indicate whether each residence is participating or non-participating.
 2. Explain whether the removal or adjustment of some solar panels could reduce the glare experienced by those residences.

Response:

- a. Stantec modeled the glare using ForgeSolar glare hazard analysis software. The results are the best available information and interpretation available. Green glare is only predicted for a small amount of time during October to February.
- b. The referenced public comment does not include a copy of the research or publication. Despite the efforts of Wood Duck and its counsel, the referenced research is not publicly available. The Social Science Research Network (SSRN) website notes this research paper (SSRN #5280613) is under review or has been removed from SSRN at the request of the author, SSRN, or the rights holder. Because the source and accuracy of the comment could not be verified, Wood Duck refers the Board to the extensive research and discussion provided by Rich Kirkland.