

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Republic)	
Wind, LLC for a Certificate to Site Wind-)	Case No. 17-2295-EL-BGN
Powered Electric Generation in Republic and)	
Sandusky Counties.)	

**SENECA COUNTY COMMISSIONERS, ADAMS TOWNSHIP, REED TOWNSHIP,
SCIPIO TOWNSHIP, AND SENECA COUNTY PARK DISTRICT’S LIST OF ISSUES
FOR CROSS-EXAMINATION OF WITNESSES AT EVIDENTIARY HEARING**

Pursuant to the August 19, 2019 Entry by the Ohio Power Siting Board and Administrative Law Judge Intervenor Seneca County Commissioners, Adams Township, Reed Township, Scipio Township and Seneca County Park District respectfully provide the following list of issues that these Intervenor may be interested in pursuing cross examination of witnesses at the evidentiary hearing:

- Noise. Specifically Intervenor will cross-examine witnesses on the calculation of the preexisting background noise level; the methodology in calculating the day and nighttime average ambient noise levels; the impact of the noise generated by this project on the community;
- Birds and bats. Specifically Intervenor will cross-examine the methodology for calculating the mortality rate for birds and bats from the operational turbines.
- Ground water pollution. Specifically Intervenor will cross-examine witnesses on the construction of turbines on areas that have Karst features including, but not limited to the structural issues related to Karst and the potential outwash from Karst areas.

- Public safety—life flight. Intervenor will cross-examine the methodology that determined that a predesignated landing zone and access to an emergency operations phone center will not be a detriment to the public interest.
- Road use and repair. Intervenor will cross-examine the planned use of Seneca County and Township Roads and how those roads will be maintained during the construction process and remedied upon the conclusion of the project.
- AEZ compliance. Intervenor will cross-examine applicant's compliance with Ohio Revised Code Section 5727.75(F)(5), (6), and (7).
- Shadow flicker. Specifically Intervenor will cross-examine the methodology for calculating the shadow flicker created by these turbines and the impact that shadow flicker may cause to persons in the vicinity of the turbines.
- Airport. Specifically Intervenor will cross-examine the methodology that determined that this project is in the public interest when the location and height of at least one turbine impacts runway access at the Seneca County Airport.

The Seneca County Commissioners, Adams Township, Scipio Township, Reed Township, and the Seneca County Park District reserve the right to supplement this pleading as allowed by law.

Respectfully submitted,

/s/Derek W. DeVine
DEREK W. DeVINE
SENECA COUNTY PROSECUTING
ATTORNEY
Registration #0062488 (counsel of record)
79 S. Washington Street
Tiffin, Ohio 44883
(419) 448-4444
(419) 443-7911 (fax)
dwd@senecapros.org

/s/Joshua D. Clark

Joshua D. Clark

Assistant Seneca County Prosecuting
Attorney

Attorneys for Seneca County
Commissioners, Adams Township, Scipio
Township, Reed Township, and Seneca
County Park District

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 in the service list of the docket card who have electronically subscribed to this case.

The following unrepresented parties were served by email on September 5, 2019: Leslie & Dennis Hackenburg at Dennyh7@frontier.com; Allen Hassellbach at marybozanne@gmail.com; and Mike & Tiffany Kessler at mkessler7@gmail.com.

/s/Derek W. DeVine

Derek W. DeVine #0062488

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in

Case No(s). 17-2295-EL-BGN

Summary: Notice of Seneca County Commissioners, Adams Township, Reed Township, Scipio Township and Seneca County Park District's List of Issues for Cross-Examination of Witnesses at Evidentiary Hearing electronically filed by Mr. Derek W. DeVine on behalf of Board of Seneca County Commissioners and Board of Trustees of Adams Township, Seneca County, Ohio and Board of Trustees of Scipio Township, Seneca County, Ohio and Board of Trustees of Reed Township, Seneca County, Ohio and Board of Park Commissioners of the Seneca County Park District, Seneca County, Ohio