

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Firelands Wind,	}	Case No. 18-1607-EL-BGN
LLC for a Certificate of Environmental Compatibility	}	
and Public Need to Construct a Wind Powered Electric	}	
Generation Facility in Huron and Erie Counties	}	

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**ISSUE LIST OF THE BOARD OF TRUSTEES OF  
RICHMOND TOWNSHIP, HURON COUNTY, OHIO**

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Now comes The Board of Trustees of Richmond Township, Huron County, Ohio, by and through its undersigned counsel, submits its issue list identifying specific concerns it may be interested in pursuing during cross-examination of witnesses at the adjudicatory hearing in this matter pursuant to the Administrative Law Judge's entry in this docket of July 13, 2020.

As noted in its petition for leave to intervene, filed October 4, 2019, the Board of Trustees of Richmond Township, Huron County, Ohio intervened on the grounds that it has an extensive interest in the proceedings as the elected representatives of the citizens of Richmond Township, Huron County, Ohio; that said Township's interest is not and cannot be represented by another party, existing or otherwise, that its contribution of presenting to the Board the costs and benefits of the project to the citizens of Richmond Township, Huron County, Ohio is essential to a just and expeditious resolution of the issues involved in the proceeding and that it would not unduly delay the proceeding or unjustly prejudice an existing party.

By submitting this issue list, the Board of Trustees of Richmond Township, Huron, Ohio does not waive its right to explore other issues during cross-examination based upon responses to discovery or prefiled testimony.

The issue list of Board of Trustees of Richmond Township, Huron County, Ohio is as follows:

1. Whether, and to what extent, will activities during the construction, operation, and possible future decommission if the project is approved, interfere, harm, damage, or otherwise affect the public roadways, bridges, and/or culverts of Richmond Township, Huron County, Ohio and to the extent the applicant will be required to repair and/or restore these public roadways, bridges, and/or culverts to their prior state.
2. Whether, and to what extent, will activities during the construction, operation, and possible future decommission if the project is approved, affect the wildlife and other ecology within the project and surrounding areas.
3. Whether, and to what extent, will activities during the construction, operation, and possible future decommission if the project is approved, cause the need for additional safety, rescue, and other emergency response training, as well as create the need for new and/or addition equipment necessary to accomplish the required response to any emergency situation with may arise concerning the project.
4. Whether, and to what extent, will the applicant be responsible to assure that the fire and other emergency response facilities and personnel are properly trained and equipped to enable said emergency responders to respond to any such emergencies, should they so arise, during the construction, operation, and possible future decommission of the project.
5. Whether, and to what extent, will activities during the construction, operation, and possible future decommission if the project is approved, cause unreasonable adverse shadow flicker and sound levels in excess of the prescribed levels by the Ohio Administrative Code Section 4906-04-09.

Respectfully submitted,  
JAMES JOEL SITTERLY  
Huron County Prosecutor

/s/Jacob S. Stephens

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## **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 on the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a copy of the foregoing document has also been served upon the persons below this 27th day of August, 2020.

/s/Jacob J. Stephens

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**Case No(s). 18-1607-EL-BGN**

Summary: Notice Issue List for the Board of Trustees of Richmond Township, Huron County, Ohio electronically filed by Mr. Jacob J Stephens on behalf of Board of Trustees of Richmond Township, Huron County, Ohio