

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: Public comment: OPSB Case # 18-1607-EL-BGN
Date: Friday, August 28, 2020 11:28:50 AM
Attachments: [What is the criteria that determines the project area of a wind farm project.pdf](#)
[Scan0006.pdf](#)
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From: Gail & Keith Moyer <kglmoyer@bright.net>
Sent: Friday, August 28, 2020 10:44 AM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
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Matt,
Please place this in the public comments for OPSB case #18-1607-EL-BGN, Firelands Wind LLC (Emerson Creek Wind Farm).
I am attaching 1 PDF which is the written document, and three scans. The 3 scans are supporting documents. If you have any questions, feel free to respond to this e-mail and I will get back to you as quickly as possible.
Thank you for your time.

Keith L. Moyer
3040 South State Route 67
Tiffin, OH 44883

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What criteria determines the footprint of a wind farm project? Is it determined by the applicant or is the Ohio Power Siting Board responsible to judge the merit of the area of the wind farm footprint?

This question seems appropriate after reviewing the proposed Emerson Creek Wind Farm project map. The project map, as seen in **Diagram 1**, has areas in the footprint that are completely surrounded by the proposed project yet are not included in the project footprint. **(Points A, B, C and D)** These areas would be encompassed by turbines, but are not included in the actual wind farm footprint. Residents in these areas are affected by the wind farm as much or more than residents inside the wind farm footprint, but have no legal recourse for intervention in the OPSB process, as they are not in the wind farm footprint.

The city of Bellevue (**Diagram1: as noted**) is projected to have wind turbines on three sides of its perimeter, but is also not included in the wind farm footprint.

There are also sections of this proposed project connected to the rest of the project by strips of land only a couple of hundred feet wide. (**Diagram 1: Points E, F, G, H, and I**)

Figure 08-5: Land Use shows two of these points (**A and E**) in greater detail.

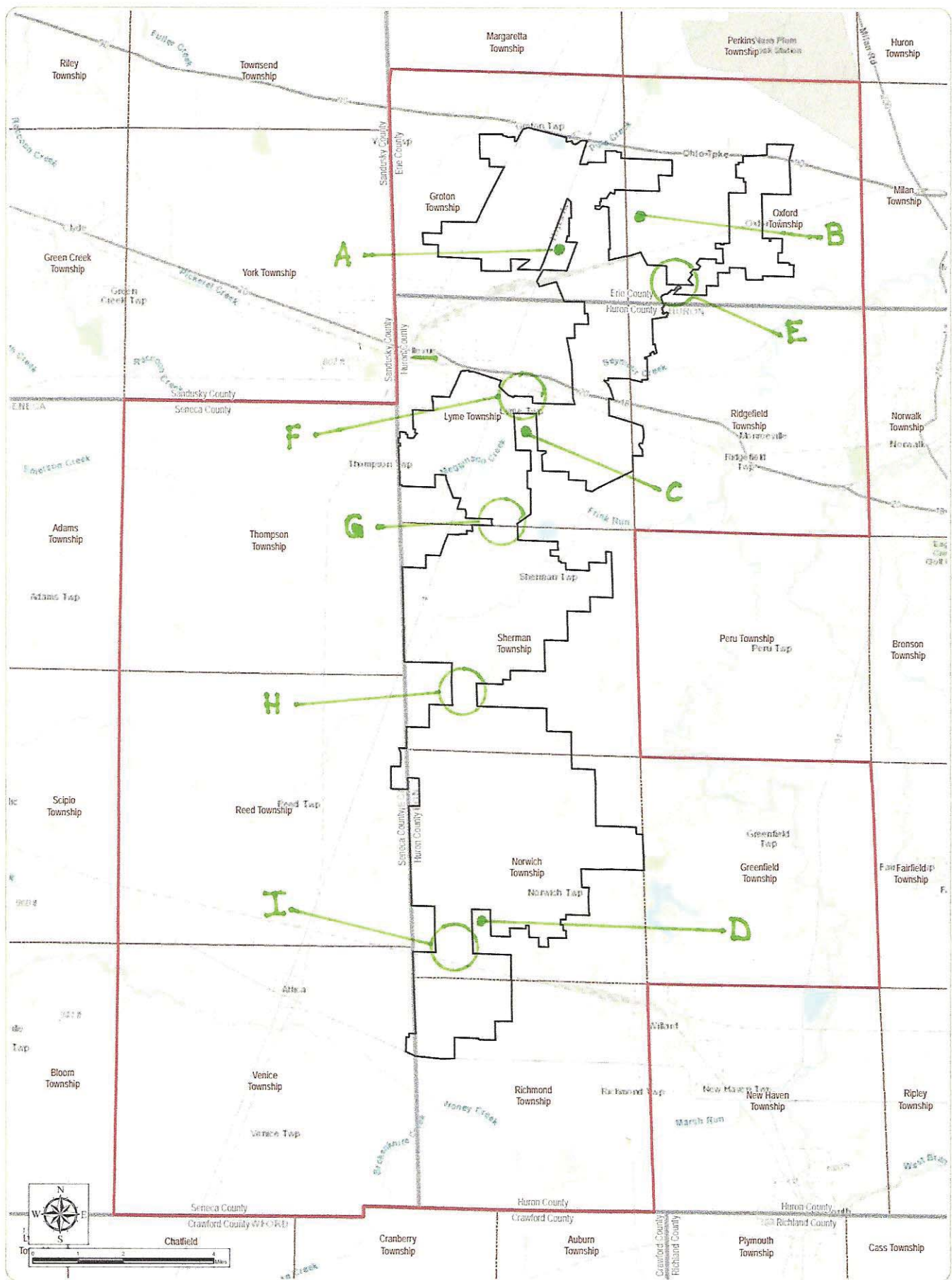
The present proposed Emerson Creek Wind Farm project is 9 miles east to west and 20 miles north to south. Applying simple math to a rectangle this size would create a project encompassing 80 square miles or 115,200 acres. In contrast, the present proposed footprint includes only 32,000 acres.

A logical project footprint would have straight line borders connecting the outermost points to one another. With respect to the proposed Emerson Creek Wind Farm, it would look like the representation shown in **Diagram 2**. It would include the present proposed footprint and the area in red.

The total area of this suggested logical project footprint is about 80,000 acres, considerably more than the present proposed project footprint.

The present configuration of the proposed Emerson Creek Wind Farm appears to be multiple pieces of a jigsaw puzzle. At least when all the pieces of a jigsaw puzzle are in place, a whole picture is evident and the borders are straight. This work-around method is common to Apex wind farm projects, and is also evident in the Republic Wind Farm. It is not unlike Blitzkrieg warfare where soft targets in areas are taken first and then when resistance lessens the whole area is taken.

Due to the unscrupulous methodology for determining the footprint of the proposed Emerson Creek Wind Farm project, the application for a certificate should be denied.



Emerson Creek Wind Farm

Erie, Huron, and Seneca Counties, Ohio

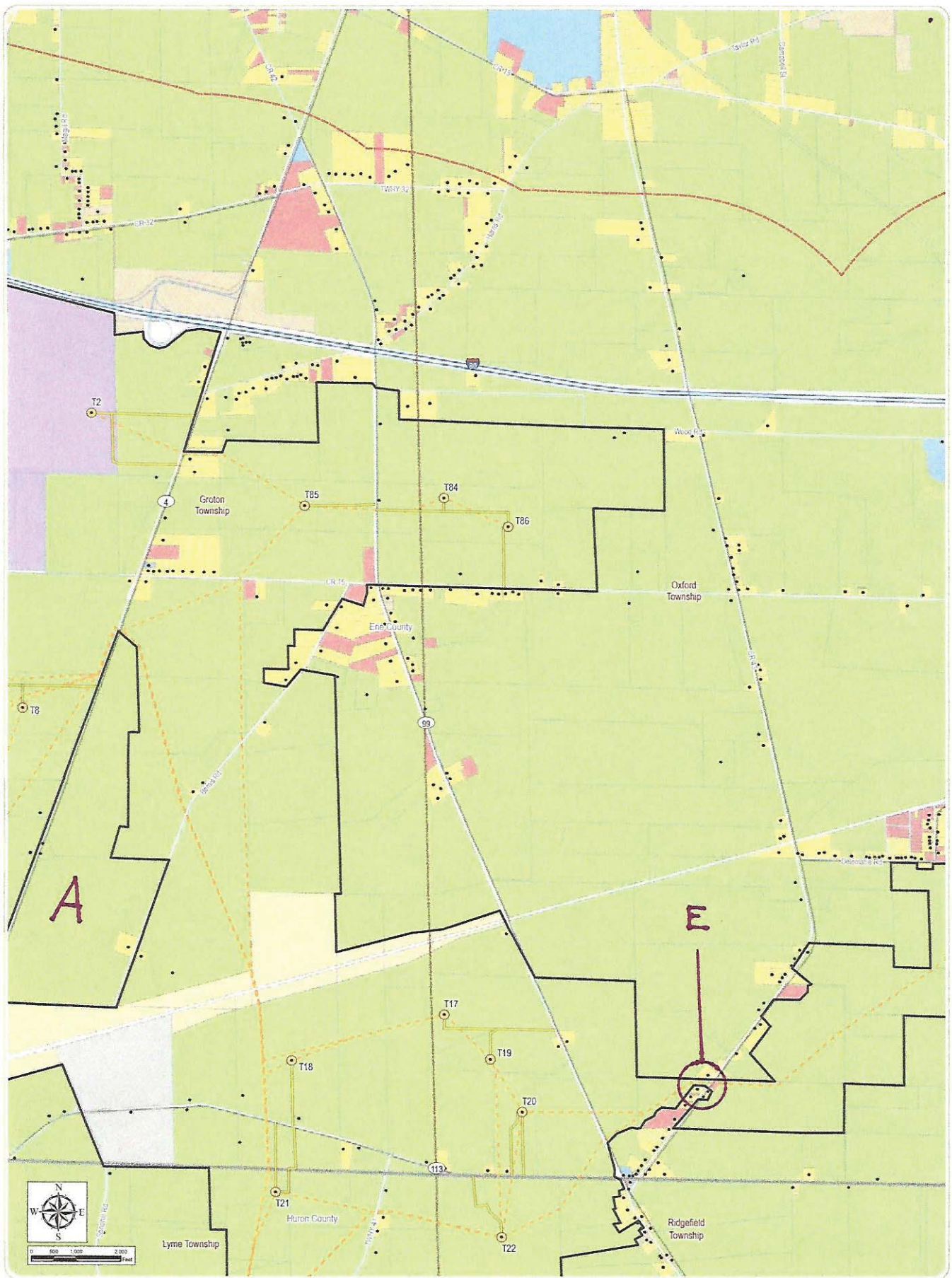
Figure 04-1: Study Areas Evaluated

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service. 2. This map was generated in ArcMap on January 16, 2019. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data. 4. Project Boundary provided by Apex. 5. Map Scale 1:125,000.

- Project Boundary
- Study Area Evaluated
- Township Boundary
- County Boundary

DIAGRAM 1





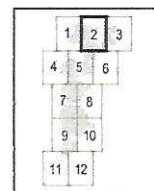
Emerson Creek Wind Farm

Erie, Huron, and Seneca Counties, Ohio

Figure 08-5: Land Use

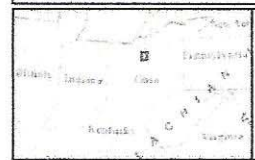
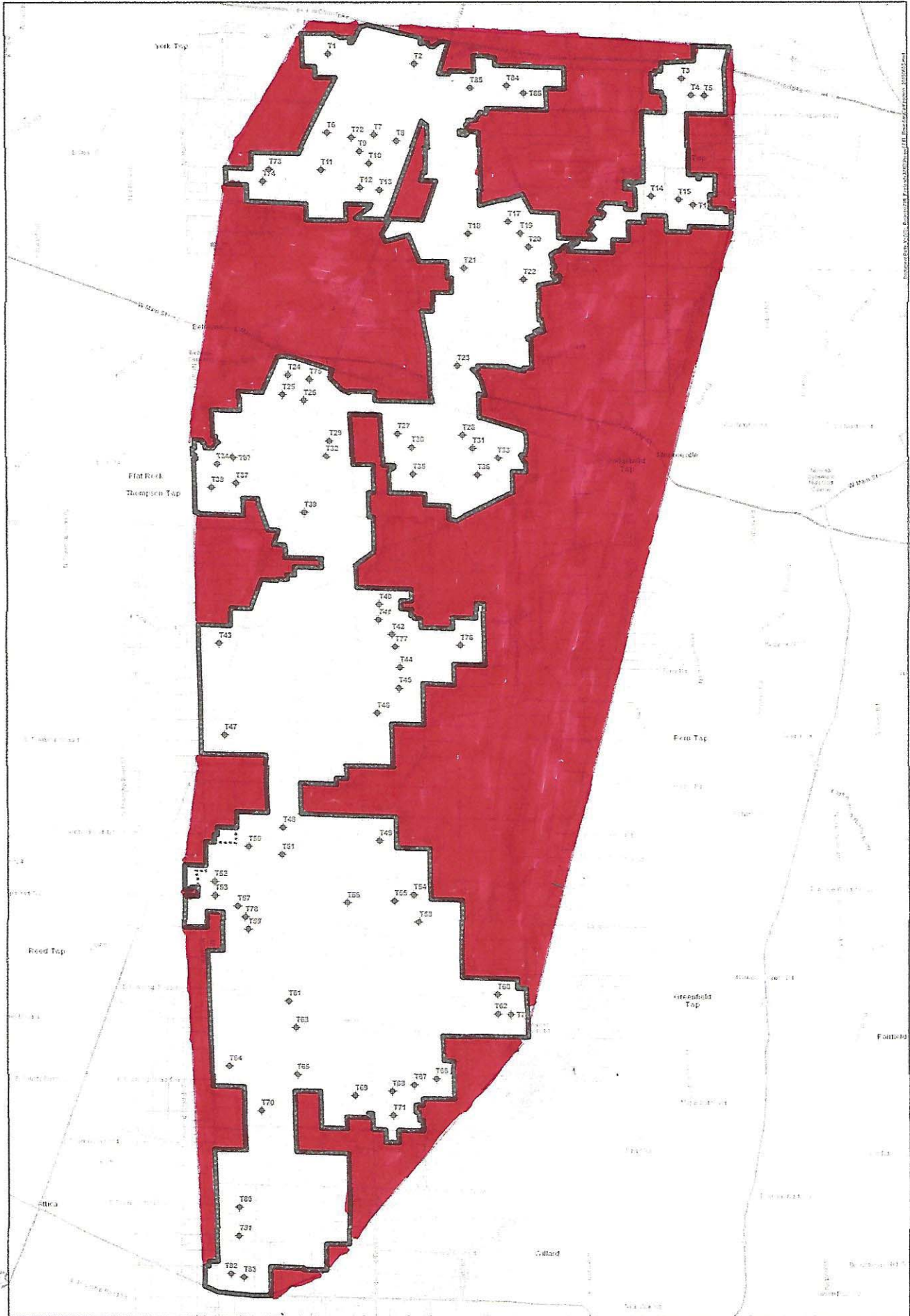
Notes: 1. Basemap: ESRI StreetMap North America, 2008. 2. This map was generated in ArcMap on January 16, 2019. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data. 4. Facility components, parcel and receptor data provided by Apex. 5. Map Scale 1:24,000.

- Wind Turbine
- Receptor
- Access Road
- Collection Line
- Project Boundary
- 1 Mile Study Area
- Township Boundary
- County Boundary
- Land Use
 - Agricultural
 - Commercial
 - Exempt Property
 - Industrial
 - Public Utility
 - Residential
 - Unknown
 - Vacant



Sheet 2 of 12





Emerson Creek Wind

- ◆ Proposed Turbine Location
- ▬ Parcel Boundary
- ▬ Current Project Boundary
- ▬ Old Project Boundary

**DIAGRAM
2**

0 0.25 0.5 1 1.5 2 Kilometers
0 0.25 0.5 1 1.5 2 Miles

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APEX
ELECTRIC SERVICES

Date: 6/5/2019
Author: JF

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

Summary: Public Comment of Keith L. Moyer, via website, electronically filed by Docketing Staff on behalf of Docketing