

1 BEFORE  
2 THE OHIO POWER SITING BOARD

3  
4 In the Matter of the Application of  
5 Border Basin I, LLC, for a Certificate of Environmental  
6 Compatibility and Public Need to Construct a Solar-  
7 Powered Electric Generation Facility in Hancock County

Case No.: 21-0669-EL-BGN

LIST OF ISSUES FOR CROSS-EXAMINATION  
SUBMITTED BY AUDRA DEUBLE

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10 The above-named Intervenor hereby submit their list of issues about which they may pursue cross-  
11 examination at the hearing. Intervenor may ask questions about the following issues:

- 12  
13 1. The Loss of farmland and food production on the acreage occupied by the Project.
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15 2. The visual impacts of the South Branch Solar Project (“project”).
- 16  
17 3. The project’s potential harm to eagles, birds, and bats colliding with the project’s components, and South  
18 Branch failure to provide for mortality monitoring for birds and bats.
- 19  
20 4. South Branch Solar’s failure to provide a fence design adequate to allow wildlife movement.
- 21  
22 5. South Branch’s failure to adequately protect motorist from glare from solar panels, and that the setbacks  
23 are adequate enough to not impose the road view on the road the panels are to be put nearby.
- 24  
25 6. South Branch Solar’s failure to identify the Projects adverse impacts on the local economy such as  
26 reduced property values and adverse economic impacts on local farming.
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LIST OF ISSUES FOR CROSS-EXAMINATION SUBMITTED BY AUDRA DEUBLE - 1

1 7. The failure of South Branch Solar to evaluate and prevent potential damage to drainage tiles and surface  
2 waterways from the project's construction and operation.

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4 8. South Branch Solar's failure to protect intervenors and nonparticipating neighbors from flooding and  
5 increases in runoff from the project area during construction and operation.

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7 9. The production of air pollution emissions from the manufacturing and transportation of solar equipment  
8 and the mining and production of raw materials and solar components.

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10 10. The disposal method of the projects s solar panels and other solar equipment and structures upon  
11 replacement or during decommissioning.

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13 11. South Branch Solar's failure to provide setbacks that are adequate in size to protect intervenors and  
14 adjacent property owners.

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16 12. South Branch Solar's project failure to state an adequate emergency plan to protect intervenors and  
17 adjacent residences in the event of a fire or explosion.

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19 13. The suitability of the project's location for solar production and its proximity to nonparticipating  
20 neighbors.

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22 14. The projects impairment of the quality of life for intervenors, adjacent landowners, and surrounding  
23 communities.

1 15. Communications and interactions between South Branch Solar and local officials, participating  
2 landowners, and the community, including South Branch Solar's concealment from the public of its intent to build  
3 the project.

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5 16. The Projects effects on property losses to nonparticipating properties.

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7 17. South Branch Solar's guarantee that the money promised to Arcadia school district is actually paid.

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9 18. The conditions proposed in the Staff report and the conditions or revisions to conditions proposed by  
10 South Branch Solar or other parties.

11  
12 19. South Branch Solar's plans for traffic, road repairs, well issues along with other problems caused from  
13 the project.

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15 20. The recommendations by staff and other parties for submitting plans after issuance instead of including  
16 the plains in the application.

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18 21. Vegetation management plan, including types of seeds planted in the project area, livestock/grazers in  
19 the project area, mowing and all other prevention of noxious weeds.

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22 22. Lightning

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24 23. All issues listed in intervenors' Petition to intervene.

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26 24. The issues for cross-examination included in any other party's list of issues.

1 25. The issues discussed in the testimony of any other parties' witnesses.

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3 26. The impact of the solar field on neighbors who have pacemakers or defibrillators.

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5 27. Failure to protect aquatic life

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7 28. South Branch Solar's failure to adequately address the concern regarding the VOR directional radio  
8 signal, just north of Arcadia, pertaining to the approach to Fostoria Airport and the cause of possible delay to Life  
9 flight.

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14 Respectfully submitted,

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17 Audra Deuble  
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Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 21-0669-EL-BGN**

Summary: Motion motion to intervene electronically filed by Mrs. Audra Deuble on  
behalf of Audra Deuble