

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Icebreaker)	
Windpower Inc., for a Certificate to Construct a)	Case No: 16-1871-EL-BGN
Wind-Powered Electric Generation Facility in)	
Cuyahoga County, Ohio.)	

TESTIMONY OF

Benjamin R. Brazell

**Principal, Director of Environmental Services
Environmental Design & Research, Landscape, Architecture,
Engineering & Environmental Services, D.P.C.**

**on behalf of
Icebreaker Windpower Inc.**

September 6, 2018

1. Please state your name.

Benjamin R. Brazell.

2. Please state your business address.

217 Montgomery Street, Suite 1000, Syracuse, NY 13202.

3. Please summarize your educational background and professional experience.

I received a Bachelor of Science Degree in Natural Resources Ecosystem Assessment from North Carolina State University in Raleigh, North Carolina in 2001. I have been employed by EDR since February 2004. Since that time, I have worked in the capacity as Ecologist, Project Manager, Senior Project Manager, and Director of the Environmental Division before becoming Principal of Environmental Services in 2014. I have over 15 years of experience performing and/or supervising projects involving wetlands delineations, state and federal wetland permitting, habitat and ecosystem analysis, environmental impact assessments, and preparation of numerous state siting board applications and environmental impact statements. My resume is attached as Attachment BRB-1.

4. By whom are you employed?

Since early 2004, I have been employed by Environmental Design & Research, Landscape, Architecture, Engineering & Environmental Services, D.P.C. ("EDR").

5. What is your position with EDR and what are your current responsibilities?

I am a Principal, Director of Environmental Services with EDR and I oversee all aspects of EDR's environmental assessment projects.

6. On whose behalf are you offering testimony in this case?

Icebreaker Windpower, Inc. ("Icebreaker" or "Applicant").

1 **7. Have you previously testified before the Ohio Power Siting Board?**

2 Yes. I provided direct testimony in the applications of Paulding Wind Farm LLC Wind
3 Farm (Case No. 15-2030-EL-BGA), Paulding Wind Farm III LLC Wind Farm (Case No.
4 15-2031-EL-BGA), Paulding Wind III LLC Transmission Line (Case No. 15-1737-EL-
5 BTX), and Hillcrest Solar I, LLC Solar Facility (Case No. 17-1152-EL-BGN).

6
7 **8. Have you been involved in other cases subject to review by the Ohio Power Siting**
8 **Board?**

9 Yes. In addition to those cases for which I provided direct testimony, I was responsible for
10 the preparation of numerous other applications for a certificate of environmental
11 compatibility and public need submitted to the Ohio Power Siting Board (“Board”),
12 including the Buckeye Wind Farm (Case No. 08-0666-EL-BGN), Timber Road Wind Farm
13 (Case No. 09-0980-EL-BGN), Timber Road II Wind Farm (Case No. 10-0369-EL-BGN),
14 Buckeye II Wind Farm (Case No. 12-0160-EL-BGN), Scioto Ridge Wind Farm (Case No.
15 13-1177-EL-BGN), Scioto Ridge Transmission Line and Point of Interconnect Substation
16 (Case No. 13-1767-EL-BSB), Buckeye Amended Application (Case No. 17-2516-EL-
17 BGA), Buckeye II Amended Application (Case No. 17-2517-EL-BGA), the Republic
18 Wind Farm (Case No. 17-2295-EL-BGN), and the Timber Road IV Wind Farm (Case No.
19 18-0091-EL-BGN).

20
21 **9. Have you previously provided testimony or served as an expert witness before any**
22 **other court, agency, or other body in relation to your expertise?**

23 Yes. I have provided testimony and served as an expert witness before the New York State
24 Public Service Commission and the New York State Board on Electric Generation Siting
25 and the Environment. I sponsored testimony in National Grid’s petition to amend the
26 Article VII Certificate of Environmental Compatibility and Public Need for the 115 kV
27 Fenner to Cortland #3 Transmission Line (Case No. 70346), sponsored testimony in the
28 Baron Winds LLC Application for a Certificate of Environmental Compatibility and Public
29 Need for the Baron Winds Project (Case No. 15-F-0122), and provided written rebuttal and
30 sur-rebuttal testimony, and as an expert witness I was subject to cross examination under

oath, in Cassadaga Wind LLC's Application for a Certificate of Environmental Compatibility and Public Need for the Cassadaga Wind Farm (Case No. 14-F-0490).

10. What is your role in this Application before the Board?

My role was to oversee the preparation Icebreaker's Application for a Certificate of Environmental Compatibility and Public Need, which was filed with the Board by Icebreaker on February 1, 2017 ("Application"). I was ultimately responsible for content, organization, and compilation of the Application to ensure it was prepared in accordance with the content requirements set forth at Rule 4906-4 of the Ohio Administrative Code.

11. Have you served this role on other applications submitted to the Board?

Yes. I served an identical role and assumed the same responsibility for all applications identified above in response to questions #6 and #7, which includes a total of 15 applications before the Board (including Icebreaker).

12. How would you describe your ability to adequately manage/prepare applications submitted to the Board?

With respect to my primary responsibility, which is ensuring a given application has been prepared in accordance with the content requirements set forth in the Ohio Administrative Code, I believe I have been very successful.

13. Please state the purpose of your testimony.

The purpose of my testimony is to address the overall compilation of the Application itself, land use/community development, and communications and navigation. I am sponsoring the following exhibits that are attached to Icebreaker's February 1, 2017 application ("Application") in this case:

- Exhibit R - the Navigational Risk Assessment ("NRA");
- Exhibit V - National Telecommunications and Information Administration ("NTIA") Response; and
- Exhibit W - the Microwave Study.

1 My testimony, together with the other Icebreaker witnesses testifying this this case, will
2 confirm that the joint stipulation and recommendation (“Stipulation”), which was filed in
3 the docket on September 4, 2018, and is being offered in this proceeding as Joint Exhibit
4 1, supports a finding by the Board that the Stipulation represents the is in the public
5 interest.
6

7 **14. Please provide a summary of how the Application in this matter was compiled.**

8 I worked with various EDR technical experts and staff to ultimately prepare/compile all
9 necessary text, figures, and exhibits needed to support the Application. This required
10 continuous internal collaboration and work sessions to ensure EDR personnel had all
11 information needed to complete a given production task, and ongoing external
12 consultation with Icebreaker personnel, project legal counsel, and other consulting firms.
13 Generally, once all information necessary to complete a given section of the Application
14 text was available, EDR staff then prepared the initial draft of the respective section for
15 client/legal counsel review. For example, Section 4906-4-03 (Project Description and
16 Schedule) required a significant amount of information from the Applicant, including a
17 description of all areas owned and leased for the project, a description of all proposed
18 project components (e.g., turbines, towers, foundations, electrical collection, point of
19 interconnect substation, meteorological towers, construction laydown areas, operations
20 and maintenance facilities), and a description of the project schedule. Essentially all of
21 this information was provided to EDR by the Applicant, at which point EDR staff
22 prepared an initial draft of this section of the Application. The initial draft was then
23 subject to multiple rounds of internal review and editing, and subsequently sent to the
24 Applicant and project legal counsel for their review. Once all comments were
25 incorporated into the respective section, it was essentially considered complete from a
26 content perspective and awaits final formatting. This process was repeated for all other
27 Application Sections.
28
29
30

1 **15. Above you indicate that you are also sponsoring Application Exhibit R, the NRA.**

2 **Can you explain why you are sponsoring this exhibit?**

3 The NRA was prepared by EDR in general accordance with the United States Coast
4 Guard (“USCG”) guidance for Offshore Renewable Energy Installations contained in the
5 *Navigation and Vessel Inspection Circular No. 02-07* and the *Risk-Based Decision-*
6 *Making Guidelines for Preliminary Hazard Analysis* from the USCG. An initial draft of
7 the NRA was provided to the USCG for review, and the draft was subsequently updated
8 based on the USCG comments and then included with the Application.

9
10 **16. Above you indicate that you are also sponsoring Application Exhibit V (NTIA**
11 **response) and Exhibit W (Microwave Study). Can you explain why you are**
12 **sponsoring these exhibits?**

13 Both Exhibit V and Exhibit W represent information provided to the Applicant by
14 Comsearch, and EDR has been working with Comsearch in this capacity for over 10
15 years. Therefore, I reviewed the information provided by Comsearch to determine if it
16 was consistent with industry standards and if it provided the data needed to comply with
17 the requirements of the O.A.C.

18
19 **17. Does this conclude your testimony?**

20 Yes.

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. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons listed below via electronic mail this 6th day of September, 2018.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

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Icebreaker Windpower, Inc.
Case No. 16-1871-EL-BGN
Testimony
September 6, 2018

Attachment BRB-1

CV/Resume

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Benjamin R. Brazell, Principal Director of Environmental Services



education

North Carolina State University, Raleigh, NC,
Bachelor of Science,
2001..

professional affiliations

Member, New York State
Wetlands Forum

Member, American Wind
Energy Association

Member, Town of Dewitt

Parks & Recreation Commission

Member, American Wind Energy Association Siting &
Environmental Compliance Committee

employment history

Principal, Environmental Design & Research, Landscape
Architecture, Engineering & Environmental Services, D.P.C.,
Syracuse, NY, 2011 - Present.

Associate, EDR Environmental Services, LLC, Syracuse, NY,
2010 - Present.

Division Manager, EDR Environmental Services, LLC,
Syracuse, NY, 2009 - Present.

Project Manager, Environmental Design & Research,
Syracuse, NY, 2004 - 2008.

Project Scientist, EcoScience Corporation, Raleigh, NC, 2001 -
2003.

representative project experience

Cassadaga Wind Project – Managing EDR responsibilities for project review of a proposed new 58-turbine, 126 MW wind power project. under Article 10 of the Public Service Law in the Towns of Cherry Creek, Charlotte, Arkwright, and Stockton, Chautauqua County, NY. *First Article 10 Application submitted in the State of New York*. Managed preparation of the Public Involvement Program Plan, the Preliminary Scoping Statement, Stipulations document, and multiple support studies.

Baron Winds Project – Managing EDR's responsibilities associated with this 120 turbine, 300 MW project located in the Towns of Avoca, Cohocton, Dansville, Fremont, Howard, and Wayland, Steuben County, New York. This project is being reviewed under Article 10 of the Public Service Law and to date, EDR has prepared the Public

Involvement Program Plan and the Preliminary Scoping Statement.

Galloo Island Wind Project – Principal-in-Charge overseeing EDR's responsibilities associated with this 32 turbine, 110 MW project located in the Town of Hounsfield, Jefferson County, New York. This project is being reviewed under Article 10 of the Public Service Law and to date, EDR has prepared the Public Involvement Program Plan, the Preliminary Scoping Statement, and the draft Stipulations document.

Jericho Rise Wind Farm – Principal-in-Charge for the SEQRA review for this 37-turbine, 78 MW project, located in the Towns of Belmont and Chateaugay, Franklin County, New York. EDR prepared a Supplemental EIS, a Final EIS, and multiple support studies including a Visual Impact Assessment, Shadow Flicker Analysis, Cultural Resources Reports (Archaeology and Historic Resources), a Wetland Delineation Report, and a Rare Plant Survey. EDR also obtained wetland/stream permits from the U.S. Army Corps of Engineers and the NYS Department of Environmental Conservation.

Arkwright Summit Wind Farm – Principal-in-Charge for the SEQRA review for this 36-turbine, 78 MW project, located in the Town of Arkwright, Chautauqua County, New York. EDR prepared a Supplemental EIS, a Final EIS, and multiple support studies including a Visual Impact Assessment and Shadow Flicker Analysis. EDR is also responsible for obtaining wetland/stream permits from the U.S. Army Corps of Engineers and the NYS Department of Environmental Conservation.

Scioto Ridge Wind Farm – Managed the preparation of a Certificate Application submitted to the Ohio Power Siting Board for this 176-turbine, 300 MW project located in Hardin and Logan Counties, Ohio. EDR's responsibilities included attending work sessions with OPSB staff, directing other subconsultants, coordinating internal staff resources, and assuring a complete application was prepared/submitted in accordance with the Ohio Administrative Code. Also managed the preparation of a separate Certificate Application for the associated 4.8-mile 345 kilovolt transmission line, which was submitted subsequent to the wind farm application and also accepted as complete following its first submittal.

Copenhagen Wind Project – Directing EDR's responsibilities as a third-party consultant to the USFWS. As a result of potential impacts to federally- listed species, the developer is applying for an Incidental Take Permit. EDR is responsible for preparing all NEPA documentation associated with this action.

Crown City Wind Energy Project – Directed EDR's SEQRA review for this 44-turbine, 71 MW project, located in the Towns of Cortlandville, Homer, Solon, and Truxton, Cortland County, New York. EDR prepared a Draft EIS, and throughout this process worked closely with the Lead Agency's consultant. In support of the Draft EIS, EDR also prepared a Visual Impact Assessment, Shadow Flicker Analysis, Addendum Cultural Resources Report, and a Socioeconomic Report.

Buckeye II Wind Power Project – Managed the preparation of a comprehensive Application for a Certificate of Environmental Compatibility and Public Need submitted to the Ohio Power Siting Board for this 56-turbine, 140 MW project located in Champaign County, Ohio. EDR's responsibilities included conducting initial site reconnaissance to define the project layout, attending various work sessions with OPSB review staff, directing other subconsultants, coordinating internal staff resources, and assuring a complete application was prepared/submitted in accordance with the Ohio Administrative Code.



Benjamin R. Brazell, Principal Director of Environmental Services

Allegany Wind Power Project – Directed EDR's SEQRA review for this 29-turbine, 72.5 MW project, located in the Town of Allegany, Cattaraugus County, New York. EDR prepared a Draft and a Final EIS, which resulted in successful issuance of SEQRA findings statement and local discretionary approvals in July 2011. Through these efforts, EDR has worked closely with the Lead Agency Special Counsel and consultant throughout the SEQRA review process, coordinated with interested state and federal regulatory agencies, and managed numerous subconsultants. EDR was also responsible for preparation of the SWPPP in accordance with the SPDES General Permit, which was approved by the NYSDEC in September 2011.

Hardscrabble Wind Power Project (Compliance Monitoring) – Initially managed EDR's role as Environmental Monitor for the construction and restoration of this 37-turbine project located in the Towns of Fairfield, Norway, and Little Falls, Herkimer County, New York. In addition to preparing an Environmental Compliance Manual and providing compliance training to the project contractors, EDR's responsibilities included overseeing construction activities, monitoring the environmental, agricultural, and archeological conditions on the construction site, reporting on compliance with environmental permits and conditions (including federal, state, and local permits and approvals), conducting bi-weekly SWPPP inspections in accordance with the SPDES General Permit, and serving as a liaison between agency representatives and the project contractor/developer.

Timber Road II Wind Farm – Managed the preparation of a comprehensive Application for a Certificate of Environmental Compatibility and Public Need submitted to the Ohio Power Siting Board for this 109-turbine, 150 MW project located in Paulding County, Ohio. EDR's responsibilities included attending various work sessions with OPSB review staff, directing other subconsultants, coordinating internal staff resources, and assuring a complete application was prepared/submitted in accordance with the Ohio Administrative Code. Irrespective of the project's aggressive schedule, EDR played a critical role in meeting the permitting deadline.

Timber Road I Wind Farm – Managed the preparation of a comprehensive Application for a Certificate of Environmental Compatibility and Public Need submitted to the Ohio Power Siting Board for this 35-turbine, 49 MW project located in Paulding County, Ohio. EDR's responsibilities included attending various work sessions with OPSB review staff, directing other subconsultants, coordinating internal staff resources, and assuring a complete application was prepared/submitted in accordance with the Ohio Administrative Code (the application was accepted as complete following its first submittal).

Buckeye Wind Power Project – Managed the preparation of the first ever Application for a Certificate of Environmental Compatibility and Public Need submitted to the Ohio Power Siting Board for a wind power project in Ohio. This 70-turbine, approximately 130 MW project is located in Champaign County, Ohio. EDR's experience in the wind industry proved invaluable when working OPSB staff, interpreting the State of Ohio's new wind law, directing the efforts of local consulting firms, and coordinating with the project sponsor and legal counsel. The Application was accepted as complete after the first submission.

Howard Wind Power Project – Led EDR's SEQRA review for this 25-turbine, 62 MW project, located in the Town of Howard, Steuben County, New York. EDR prepared a Draft and Final EIS, and worked closely with the Lead Agency (SCIDA) Special Counsel and consultant throughout the SEQRA review process. EDR also assisted the Town of Howard (SEQRA Involved Agency) in their issuance of a Findings Statement, and obtained a local Special Use Permit. In addition, EDR obtained NYSDEC authorization under Section 401 of the Clean Water Act, and Corps authorization under Section 404 of the Clean Water Act. This project is currently under construction, and EDR's continued involvement includes obtaining authorization for various project modifications, preparing a Draft and Final EIS for a two-turbine project expansion, which is expected to be approved in August 2011, and assisting the project contractor/developer with regulatory compliance during construction.

Hardscrabble Wind Power Project (Permitting) – Coordinated EDR's SEQRA review for this 37-turbine, 74 MW project, located in the Towns of Fairfield, Norway, and Little Falls, Herkimer County, New York. EDR prepared a Draft, Supplemental, and Final EIS, and worked closely with the Lead Agency's Special Counsel and consultant through the preparation of SEQRA Findings and local Special Use Permits. EDR also obtained regulatory authorization from the Corps of Engineers and NYSDEC, designed the compensatory wetland mitigation area, obtained permit amendments necessitated by construction-driven project changes, and we are currently responsible for monitoring/reporting on the success of the wetland mitigation in accordance with Corp of Engineers/NYSDEC permit conditions. Construction was completed in early 2011, and restoration is anticipated to conclude in the summer/fall of 2011.

WindFarm Prattsburgh - Managed the preparation of a Draft and Final EIS for a 44-turbine, 75 MW project in the Towns of Prattsburgh and Italy, Steuben and Yates Counties, New York. By working closely with the Lead Agency (Steuben County Industrial Development Agency [SCIDA]) and the Lead Agency's Special Counsel and consultant, EDR successfully navigated WindFarm Prattsburgh through the SEQRA review process.

Jordanville Wind Power Project – Managed EDR's preparation of a Draft, Supplemental, and Final EIS for a 67-turbine, 136 MW project in the Towns of Warren and Stark, Herkimer County, New York. In support of this project, EDR prepared the local special use permit applications, which initiated the SEQRA review of the subject action, assisted in Lead Agency determination, and prepared three EIS's to guide the SEQRA review. EDR worked closely with the Lead Agency (Town of Warren) Special Counsel and consultant during the SEQRA review process. Subsequently, EDR prepared a fourth EIS, which addressed the reduced 40-turbine, 80 MW project.

Citizens Airtricity Wind Power Project - Coordinated EDR's SEQRA review for the 40 MW Citizens Airtricity Wind Power Project located in the Towns of Stockbridge, Eaton, Madison, and Augusta, Madison and Oneida Counties, New York. The Town of Stockbridge Planning Board assumed the role of Lead Agency for this project, which became operational in 2007.

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Summary: Testimony of Benjamin R. Brazell electronically filed by Christine M.T. Pirik on behalf of Icebreaker Windpower Inc.