

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Duke Energy     )  
Ohio, Inc., for a Certificate of Environmental     )     Case No. 16-0253-GA-BTX  
Compatibility and Public Need for the C314V     )  
Central Corridor Pipeline Extension Project     )

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**DIRECT TESTIMONY OF GREG BICKFORD ON BEHALF OF SYCAMORE  
TOWNSHIP, HAMILTON COUNTY, OHIO**

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**Q. State your name and business address please?**

Greg Bickford. My business address is 8540 Kenwood Road, Sycamore Township, Hamilton County, Ohio.

**Q. How are you employed?**

I am employed as Township Administrator of Sycamore Township, Hamilton, County, Ohio.

**Q. How long have you been in that position?**

I have been Township Administrator approximately four years.

**Q. What was your position prior to that?**

Prior to that, I was the Planning and Zoning Administrator for Sycamore Township and Assistant Township Administrator.

**Q. When did you become the planning and zoning administrator for Sycamore Township?**

February 2000.

**Q. What is your educational and employment background?**

I have a bachelor's degree in urban planning from the University of Cincinnati. I graduated in 1995. The University of Cincinnati is an accredited planning school.

I am also certified by the American Planning Association, a designation called AICP, American Institute of Certified Planners, which is a recognition of your skills and past job

experience. It culminates with a written test to receive this AICP designation. I received that designation in 2007.

I worked for the Butler County Planning Department from 1996 to 2000, where I was a land planner. I dealt with land use issues, housing issues, subdivision issues, road construction issues, utility locations.

When I started working at Sycamore Township, I was hired as the Planning and Zoning Administrator, where I have dealt with any and all aspects of economic development and construction in Sycamore Township since the year 2000.

**Q. So you're responsible for overseeing economic development in Sycamore Township?**

That's correct.

**Q. Are you also in charge of overseeing the planning and zoning that goes on in Sycamore Township?**

That's correct. The current Planning and Zoning Administrator reports directly to me.

**Q. Would the Sycamore Township Fire Chief also report directly to you?**

Yes, Chief Rob Penny reports directly to me.

**Q. Please give a description of Sycamore Township, in terms of geography, boundaries, population, mix of residential commercial uses, those sorts of things?**

Sycamore Township is a township in Hamilton County, Ohio and has adopted the home rule form of township government in the State of Ohio. The Township contains approximately seven square miles, divided up into three distinct sections. The population of Sycamore Township is approximately 20,000, and it has a wide mix of persons, from age 100-plus, all the way down to infants. So our population runs the full gamut from young to the elderly.

Our housing stock ranges everything from large acre multi-million dollar single-family homes to multifamily condominiums and apartments.

**Q. You said the population of the township is approximately 20,000. That's Township residents?**

That's correct. That is Township residents who reside within the boundaries of Sycamore Township.

**Q. Do you have an estimate as to what the daytime population is for Sycamore Township?**

Based on our economic development activities over the past 20 years, we've been able to determine that the daytime population of Sycamore Township is approximately 50,000 people on any given day, given the large retail areas that are in the Kenwood area of Sycamore Township. That a mix of shoppers, office workers, medical patients, commuters, students, and residents, The Township has three different high schools and six different school districts. Approximately 150,000 vehicles pass in and through Sycamore Township on any given day.

We've determined this, basically, by the square footages of retail and office developments, the number of parking spaces, the number of offices that we have in the township, as well as the number of schools. We have about 9,000 housing units, and we know that we have approximately 2.4 people per household in Sycamore Township.

**Q. With regard to the proposed pipeline, can you describe how it is proposed to be routed through Sycamore Township? It actually starts in the Sycamore Township, does it not?**

That is correct. Both routes, both the preferred and alternate, start in Sycamore Township, and they head west, really, at the boundary between Sycamore Township and the City of Sharonville.

**Q. Okay. Where does it start in Sycamore Township?**

It starts in the Highpoint subdivision of Sycamore Township.

**Q. Which is located where?**

Just south of Fields-Ertel Road, and just north of School Road.

**Q. And where does it run from there?**

From there, it runs west toward Conrey Road. Then it runs south along Conrey Road --both the alternate and preferred routes run south along Conrey Road, where they go under East Kemper Road. Then it goes into what is known as the Kemper Commerce Park, which is a commercial development in Sycamore Township. From that point, the alternate route heads west under Interstate-275 into the City of Blue Ash.

**Q. Do you have a reference when you're describing this route?**

I am referring to Figure 7-2A, which is part of Duke Energy's application for the pipeline and which is attached to this testimony.

**Q. And the route also consists of Figure 7-2E?**

Correct.

**Q. And 7-2F?**

Correct. My description of the pipeline route as it runs through Sycamore Township is taken from the Duke submittals with its application.

**Q. When you're describing the pipeline route, you'll be referring to those particular diagrams that were in the Duke application?**

Yes.

**Q. Please continue.**

On Figure 7-2A, the alternate route and the preferred route come into the Kemper Commerce Park. The alternate route then travels under Interstate-275 through the City of Blue Ash and is no longer in Sycamore Township. The preferred route then routes through the Kemper Commerce Park where it comes to Deerfield Road. Again, it is still in

Sycamore Township. It then travels south along Deerfield Road in Sycamore Township, past the Robert Shuler Athletic Complex, where it then turns and goes under Interstate-275 through the City of Blue Ash. It travels through the City of Blue Ash several miles, and then re-enters Sycamore Township along Blue Ash Road, approximately where the township boundary is located, just north of Elizabeth Place.

From there, it travels in proximity to Blue Ash Road -- and I'm referring to Figure 7-2E -- it's unclear whether it is in the road right-of-way or if it's outside of the right-of-way, but it travels south along Blue Ash Road in front of several single-family homes, where it will go in and out of businesses properties that are located along Blue Ash Road. Again, I can't tell exactly where it is because we don't have the detailed information. From there, it goes south into the City of Deer Park and then reenters Sycamore Township along East Galbraith Road, where it travels along East Galbraith Road to Frolic Avenue, where it passes in front of The Jewish Hospital. And again, we cannot determine if it is in the roadway, in the right-of-way or on private property.

From there, it travels eastbound -- and again, I'm still on Figure 7-2E -- along Happiness Way. I don't know if it's in the roadway right-of-way or on private property. From there it goes to Kenwood Road, where it is located on Figure 7-2F. And it shows the pipeline starting to head south on Kenwood Road. Again, I don't know if it's in the roadway, in the right-of-way or on private property.

It then continues south onto the Kenwood Towne Center property, along Kenwood Road, crosses under Montgomery Road, and comes out at the Sycamore Plaza, same situation, where it is on private property for Sycamore Plaza. Then it turns kind of in an easterly direction, on to the Sycamore Plaza site, behind the strip center owned by Nisbet Brower. That is a small strip shopping center that has approximately 35,000 square feet.

The proposed route then travels around that shopping center, and then again crosses to the other side of Kenwood Road through American Way. From there, it goes in a generally west or south direction onto St. Vincent Ferrer's property. St. Vincent Ferrer is a roman catholic church in Sycamore Township and has a grade school on the property.

The proposed pipeline then heads towards the Interstate-71. It looks as though they are going to bore under Interstate -71 and under Euclid Avenue in Sycamore Township, and then it comes up on the Kenwood Country Club property, which is in the City of Madeira, outside of Sycamore Township. And that is the last that the preferred route is in Sycamore Township.

**Q. So both the preferred route and the alternate route have portions of the pipeline proposed to be in Sycamore Township?**

Correct.

**Q. It appears that there's a significant amount of the pipeline that is in Sycamore Township on the preferred route; is that correct?**

That is correct.

**Q. And that pipeline is traveling past residential, commercial and retail properties in Sycamore Township?**

Correct, and institutional and public service properties as well.

**Q. The public service property, you mentioned Robert Shuler Athletic Complex?**

Correct.

**Q. And there's also a fire station there?**

Correct, Station 93 is our north fire station. It is staffed 24 hours a day, seven days a week. It contains a paramedic unit and the Hamilton County Urban Search & Rescue Unit that is used region wide, in addition to two fire engines. It serves a large area in the northern part of Sycamore Township. We have mutual aid with the City of Sharonville and the City of Blue Ash as well as Deerfield Township in Warren County. All of those territories are served from that particular station.

**Q. Does Sycamore Township own both the north fire station and the Shuler Athletic Complex?**

Correct.

**Q. You mentioned that the preferred route runs along Jewish Hospital in the Kenwood area?**

That is correct. It actually passes along two sides of the hospital.

**Q. You mentioned it also runs past St. Vincent Ferrer Church in Sycamore Township?**

Correct.

**Q. Does the church have a school?**

They do. They have an elementary school, grades one through eight. I believe their current enrollment is 180 students. And it actually runs through their property, not just near it.

**Q. Was the township consulted at all in the selection of the pipeline route?**

No.

**Q. Has Duke had any meetings with Sycamore Township with regard to the location, construction and operation of the pipeline in Sycamore Township?**

In August of 2016, Tom Weidman and myself met with Jim Henning, vice-president of Duke, and James Olberding, who is, I guess, chief engineer of the project. And the discussion was -- again, this was after the initial routes had been presented. The application had not yet been filed. The original proposal was for a 30-inch pipe. The discussion focused on if the township support a smaller pipe.

In that conversation they discussed running the pipe through Kenwood Road, and they discussed, briefly, construction techniques as to boring or open cutting the road. Beyond that, we did not have any other discussions about the construction of the pipe, nor did we have conversation about the location of the pipe. It was always presented as "this is where the pipe is going to go", and we talked briefly about how they were going to get it down Kenwood Road.

We did discuss in that meeting if they had looked at Interstate-71, and their response was they had not asked ODOT about running the Pipe down Interstate-71.

**Q. You mentioned that the pipeline, the proposed route, would run through residential areas?**

Correct.

**Q. What are the problems that the township sees with routing the pipeline through the residential areas?**

The first problem is, aside from the safety issue which we can get into later, these pipelines require a wide area to be cut out. There's typically, as Duke has explained, a 50-foot easement that's required.

**Q. That's what Duke has told you?**

Correct. In a lot of the areas in Sycamore Township, they are mature neighborhoods that have mature landscaping and mature tree growth, and people buy these houses for several reasons. Number one, it's in Sycamore Township. But number two, it is a densely -- I don't want to say forested, but it's a densely landscaped area, where trees provide a lot of shade and a lot of cover, and that's certainly a selling point for these houses. The pipeline, as they propose it, will take out a lot of landscaping, and potentially ruin the character of these neighborhoods that attract people to them in the first place. That's the first problem with it.

The second problem is this easement is going to be, obviously, recorded, but I see all the time, I've seen this in seventeen years here, through planning and zoning -- people will build things without permits. Oftentimes they will start digging in the ground without realizing what's down there. We've had gas lines; we've had water lines; we've had sewer lines; we've had conduits hit by people who start digging without knowing what is underground.

Any time in Sycamore Township, if you want to build something properly, it has to be put on a foundation. The foundation must be a minimum of 36 inches. They are talking about the potential depth of this pipeline being 36 inches. I have a serious concern about people not realizing there's a pipeline in their yard, and they start digging. And the next thing you know, they're on top of a pipeline, without realizing it. That is definitely a concern of ours.

The other problem we have with putting a pipeline through residential neighborhoods is the disclosure that's required. Oftentimes, people don't realize what's there and they don't disclose what's in their own property, and that causes issues as the property moves forward, is transferred, and whatnot. So those are the main issues I see with the safety aspect of a pipeline in residential neighborhoods, as well as the economic impact of what happens to that pipeline put through a residential neighborhood.

In addition, several of the neighborhoods are small lot homes that are over 50 years old. This pipeline will eliminate their ability to add onto their house. Because of the location of the pipeline easement is, if they want to construct an addition, they may not have the room to do it because the easement is taking up whatever buildable areas they had left. That's a very relevant thing, especially along Blue Ash Road, where the pipeline is going to go.

Those folks that have property on Blue Ash Road are going to have a pipeline that takes up the entire front yard, via easement, and they will not have the ability to improve their property.

- Q. In your experience as a land planner, urban planner, do you have an opinion as to how the pipeline could affect property values in a residential area?**

Especially in neighborhoods where the amenities of the neighborhood such as the mature trees and existing landscaping, it has the effect of being very detrimental on the choice to locate there. This pipeline, as I can tell from what they've shown us, will probably do a lot of damage to those mature trees, the landscaping, and it will totally change the nature of the neighborhoods.

- Q. What are the plans for traffic control during construction?**

I have not seen any from Duke.

- Q. So you don't know how they're proposing to route traffic during the construction of the pipeline?**

No.

- Q. How does the township control traffic, typically, when the township has a road construction project going on?**

We have to understand the design of the project first, and then we work to have the safety of the workers in mind. We look at, how are we going to restrict traffic; are we going to restrict lanes; how are we going to move traffic in and out of the construction zone. We have to be able to have this set up 24 hours. It has to go on constantly. You can't just set up a work zone, open up a hole in the ground, and then hope that cars are going to navigate through it in the middle of the night. You have to have a 24-hour protection zone. We have to have flaggers, where needed, to control traffic. We have to adjust traffic patterns throughout Kenwood to accommodate -- if we're closing a certain road, we're going to push more traffic another way. We've got to be able to accommodate traffic on other roads that are going to receive more traffic as a result of the construction.

So it's a process that begins almost when the project is being designed. You can't just decide that you're going to do a good road project or utility project, whatever it may be, and then have safety and traffic maintenance be an afterthought. You have to coordinate your construction with how you're going to move traffic around. You cannot just close a road. There is too much traffic to be able to shut down an entire section of four, five, or six lane road, and hope to do work on it over an extended period of time.

- Q. You mentioned, in particular on the preferred route as proposed by Duke, that it goes past Jewish Hospital?**

That's correct.

**Q. Kenwood Towne Center?**

Correct.

**Q. Sycamore Plaza. In the Kenwood Towne Centre is also the Kenwood Collection building, which is a large retail and office mix-use development?**

Correct.

**Q. The Kenwood Towne center is a large regional shopping mall?**

Correct. 1.7 million square feet.

**Q. And do you know what the square footage is on the Sycamore Plaza?**

Sycamore Plaza is approximately 350,000 square feet.

**Q. Okay. What type of road projects -- what has the township done in the area for traffic purposes because of those particular, and I'm going to call them traffic generators, problems, for the township?**

So the township, in the past ten years, has widened every road leading to those developments; that includes Galbraith Road, Montgomery Road, Kenwood Road, Hosbrook Road, Kugler Mill Road. They all have had some type of work done. Specifically, Montgomery Road was widened from originally a three-lane road, to a four-lane road, to now a seven-lane road. The bridge over Interstate-71 was widened to accommodate all of that. Kenwood Road was widened to four lanes to accommodate that. We've added turn lanes at Kenwood and Montgomery. We've improved the off ramp on 71. We've added dedicated turn lanes from the interstate directly into the Kenwood Towne Centre. We've added a turn lane from Galbraith Road to Montgomery Road, to handle the traffic from the Kenwood Collection.

We've placed utilities underground to, number one, improve utility service delivery, but also improve the aesthetics of the area. We've spent countless hours studying the traffic, and, in conjunction with ODOT, the Ohio Department of Transportation we've designed a computerized coordinated traffic system, where the traffic lights learn from the traffic patterns, and adjust themselves accordingly to deal with demand. We've also invested countless number of hours in safety service enhancements. We've added an additional EMS squad to service the Kenwood area and we've added additional police to serve the area.

So we've done everything we can to move those 150,000 people, in the peak times, in and out of the area as quickly and efficiently as possible.

**Q. What is the daytime population?**

During the Christmas shopping season, it's approximately 100,000 to 150,000. On a normal day, approximately 50,000.



- Q. Does the township have any policies for its road construction during the Christmas shopping season?**

With any public project the township performs in this particular area, the contractors are required to be out of the roadway from November 1<sup>st</sup> to Thanksgiving Day. They cannot work within the road at all. It means all lanes have to be open. There cannot be any temporary pavement; there cannot be any steel plates covering holes in the road. They must be completely out of the roadway surface and fully operational.

Then from Thanksgiving Day to January 1<sup>st</sup>, they are not permitted to work anywhere in the right-of-way. They must pull all the equipment out and they must completely leave the area for that six to seven week period.

- Q. All of those roads you mentioned are either state highways or county roads?**

Correct.

- Q. When you say the Township has widened them, the Township has directed those widening projects and improvement projects in conjunction with either Hamilton County or the Ohio Department of Transportation?**

Correct. Sycamore Township has worked with those various agencies to coordinate these processes. However, it's important to note that the Township has led the engineering efforts, and most of, if not all, of the construction costs for the projects have been borne by Sycamore Township. I think Hamilton County has maybe supplied maybe less than five percent of the construction costs of work done on county roads, and the Ohio Department of Transportation probably has supplied around thirty percent of the cost.

So the bulk of the cost and legwork has been done by Sycamore Township, in conjunction with the other agencies, but had Sycamore Township not decided to push the projects, they would not have occurred.

- Q. Do you have an estimate as to what those total costs would be for all of those improvements?**

If we go back to 2003, when the first major widening has taken place, we are over \$45 million.

- Q. And just to reiterate, Duke has not been in touch with the township regarding any type of construction plans that might occur through the Kenwood area on the preferred route?**

That is correct.

- Q. Has Duke been in touch with the township with regard to any type of safety plan, either for construction or operation of the pipeline?**

No.

**Q. Now, the proposed preferred pipeline route would transit both in the northern area of the township and the southern area, which we're referring to as Kenwood?**

Correct.

**Q. Can you describe some of the problems that would occur were the pipeline to be routed through the commercial areas? You talked about the residential areas before. How about the commercial, the retail areas?**

The commercial area provides a couple of challenges. I'll start with Jewish Hospital. Jewish Hospital has highly specialized medical equipment. They have a piece of equipment called a gamma knife. Their gamma knife is one of only a handful in the county. It is used with cancer treatment and it is located in Jewish Hospital, probably within, based on the map of figure 7-2. 500 feet of this pipeline. In discussions with Jewish Hospital, they are very concerned about the location of this pipeline with respect to that particular piece of equipment because it is very sensitive to vibration. So the concern is the effect, particularly during the construction phase.

As to the Kenwood Towne Center, according to Figure 7-2F, the pipeline is proposed to be on their private property in the Kenwood Towne Centre's parking lot. The problem with that is, this would be a permanent easement and the pipeline will be in the ground permanently. Because of that, they will not be able to build on top of it.

So the Kenwood Towne Centre -- and we have worked on plans with them to expand -- is going to lose approximately the first 50 to 100 feet of what is now parking lot. So if they ever wanted to expand the parking by building a parking garage, if they would ever wanted to develop an outlot or outlots, if they ever wanted to do anything that was going to involve permanent construction, this easement would prevent that.

The problem with that is, the Towne Centre has remained successful even through the economic downturns, because it is unique to Cincinnati. It has stores that you cannot get anywhere else. In Hamilton County, you will not find another Cheesecake Factory, you will not find another Apple Store, you will not find several stores that exist only here, and that has helped Kenwood deal with tough economic times.

If they are unable to expand, that would prove to be a major blow, not only to the Towne Centre, but Sycamore Township as well. The Kenwood Towne Centre, alone, pays over two-and-a-half million dollars a year in property taxes, and that is directly correlated with the associated land value.

The Kenwood Towne Centre is one of only a handful of malls in the country that produce over \$500 a square foot in sales. And in shopping mall terms, in real estate terms, that is an outstanding amount of sales. Very few malls in the country, or retail establishments in the country, or retail establishments in the country can say that their sales, per square foot, exceed that. As a result of all this, land values in the Kenwood area typically hover around one million dollars an acre, which is some of the highest land values in Southwestern Ohio. The pipeline, if it is constructed where the plans indicate, would severely limit their ability

to take advantage of what is offered to them. Their expansion footprint is severely limited. And because of that, it could be detrimental to their future growth and development.

The same goes for Sycamore Plaza, located across Montgomery Road from the Kenwood Towne Center. Again, the pipeline preferred route is proposed to be located on their private property. It goes behind a strip center that is in front of Sycamore Plaza, but again, the same thing applies. They are giving up their ability to expand their site because of where this pipeline is located. They have been in discussions for many years about acquiring that strip center. If that were to happen, then a new building could not be constructed that takes advantage of the plaza's current site layout. So again, the pipeline would severely limit the ability of those two key businesses to expand.

Moving on to the safety concerns, there are so many utilities underground right now in Kenwood, whether their in the right-of-way or in the roadway itself. All the buildings in Kenwood receive their utilities from underground delivery. There's no overhead lines. The number of times that somebody cuts a hole in the road or digs a hole to do exploratory engineering, a lot of times they don't call 811, which they're required to do.

You have a pipeline of this diameter, this close to the surface, as they are saying, that could spell disaster, because of the number of times that the roads are poked and prodded quite literally. So that's definitely a concern no matter where that pipeline is, but specifically in this area.

**Q. Have there been instances when, even if the utility control people were consulted, there still have been utility lines cut?**

Yes.

**Q. When and where was that?**

I can give you an example that happened about three to four months ago on our Galbraith Road project, which is ongoing right now, and which is on the northern side of the Kenwood Towne Centre. There were several utilities that were not properly marked, and the construction crew's backhoe took out a 3,000 volt power line that was in the right-of-way, but not marked. That's just a prime example.

In addition, they've hit several storm sewers that have been in the ground for maybe 100 years. Again, they were not marked; they were not documented. So these are the kind of issues we face

**Q. So even with following the proper procedure, mistakes still happen?**

Absolutely. And it's impossible -- because the way recordkeeping was done years ago, it's impossible to know what's under the ground. You try as best you can to get what's called an as-built drawing after the job is done, but oftentimes, they're not 100 percent accurate. And you have activity that was done without proper permitting or engineering that exists, that you have to deal with, too, as you find that in the field. And that's a problem in any type of construction, but it's extremely prevalent here, because you have what was a

residential neighborhood 60 to 70 years ago that is now this commercial entity. There are so many things that were put in the ground, that nobody knows about, that you don't find until you start to dig.

**Q. Let's go back to the northern area, and we were discussing the firehouse and the Schuler Athletic Complex on Deerfield Road. How many firehouses does Sycamore Township have?**

We have two firehouses.

**Q. And one is located in Kenwood?**

Correct.

**Q. And one is the facility on Deerfield Road?**

Correct.

**Q. This facility on Deerfield Road serves the northern area of the township?**

Correct, but it also serves as a backup to the southern area of the township. So, for example, if we have our fire crews and our squads out on runs, and another call comes in in Kenwood, the backup is Station 93. They will come down here to assist.

**Q. And I believe you said it also serves as a mutual aid backup for Sharonville, Blue Ash, Deerfield Township?**

Correct.

**Q. Deerfield being in Warren County?**

Correct.

**Q. This part of the township, the northern area, is located in the northeast corner of Hamilton County?**

Correct.

**Q. Just south of both Butler County and Warren County?**

Correct. Within a mile of this station is where the three counties come together, Hamilton, Butler, and Warren.

**Q. The proposed pipeline, as shown on drawing 7-2A, goes past that northern fire station?**

That's correct.

- Q. And, in fact, it that it is supposed to cross Deerfield Road, right in front of the station?**

That's correct.

- Q. Have you had any contact from Duke Energy, as far as how the emergency vehicles in that station would be able to access -- to get out for a run during construction?**

I have not.

- Q. referring to Figure 7-2A, just south on the same property is the Schuler Athletic Complex?**

Correct.

- Q. Which is a township park?**

Correct.

- Q. What type of facilities are there?**

We like to call it a first-class athletic facility with a lighted baseball field, with a scoreboard and grass infield, as well as a first-class soccer field with a scoreboard and lights.

These facilities -- the baseball field is home to Moeller High School's varsity baseball team. The soccer field is home to Mt. Notre Dame's varsity soccer team. But the fields are also available for public use. Those are some of the larger events that take place on those fields. In addition, there's a walking trail, a playground and restrooms.

- Q. And Figure 7-2A indicates that the pipeline is to run through the parking lot and along the athletic fields in the Schuler Athletic Complex?**

That is correct. It travels south along Deerfield, and then as it gets toward Interstate-275, it follows the park's boundary along the walking trail for the park, as well as two of the soccer fields, and then goes under the interstate highway. On Figure 7-2A you can see the fields, as well as the lighting structures, and you can tell that they irrigated are fields.

- Q. And that's actually indicated as, I believe, Lot 23 or No. 23?**

Correct.

**Q. Which appears to be indicating the firehouse?**

Correct. They call building 23 a commercial building footprint, although I don't know if that's an accurate statement, because it is not a commercial building, it is rather a civic building, but that's beside the point.

**Q. Is there not also a township meeting hall in that building?**

Correct. There is a 2500 square foot meeting room that is able to be used by residents and members of the business community of Sycamore Township.

They're also showing a temporary work space which, although we have not seen direct construction plans, this part of the construction is shown to be dig and place, where they will dig a hole and put the pipeline in. They will not bore in this particular area. One of my concerns is how are we going to get fire trucks out for an emergency run. You can't just park a fire truck anywhere it has to be kept in a building where the systems can be constantly maintained. So we definitely have a serious safety concern during construction as to how we going to get these vehicles out for emergency runs. On a typical day, these vehicles will average three to seven runs.

**Q. So you could not locate the emergency vehicles outside or in another location; they have to be housed in the firehouse?**

Yes. Based on what this drawing shows, even if we could park them outside, we still would have no way to get out of the driveway, because our vehicles will be prevented from crossing the ditch, or whatever the construction method is, while it's under construction.

**Q. But you could not keep them down the street or in a totally different location?**

No, because then your response time would go beyond the recommended ten minutes. By the time firefighters and paramedics left the firehouse to get to their emergency vehicles, several minutes will have passed, and that's an issue of life and death at that point.

**Q. The drawing on Figure 2-2A7- also shows a temporary easement that's going back into two or three soccer fields?**

Correct.

**Q. Do you know what the purpose of that is?**

In the application, it talks about construction methods, and they are planning to put spoils and other materials in these areas during construction.

**Q. And what affect would that have on the playing fields?**

That would render the playing fields useless for anywhere from two to four years, simply because you cannot do that type of damage to that ground. It would kill the grass. And you cannot expect to have those fields repaired and operational again within the next playing season. It takes anywhere from two to four years to establish a soccer field. These particular fields took two years to establish, and then in the past six years they have been constantly rehabilitated, to maintain their playing ability. So effectively, you would have to start over on two of the irrigated fields.

**Q. Has the township been provided with any safety plans, evacuation plans or protocols, should there be a pipeline failure in either the residential or commercial areas?**

No.

**Q. Is there any plan for how either Jewish Hospital or the Kenwood Towne Centre, Kenwood Collection, or Sycamore Plaza would be evacuated in the event of a leak or failure of the pipeline?**

There are no plans, and that's another point to this. There will be gridlock if you try to evacuate 100,000 people at the same time. Our traffic system is designed to orderly move cars through a four-hour period through our peak times. If you say you have to evacuate that number of people in an instant, you will create gridlock, and nobody will go anywhere.

**Q. Are there any other concerns that you would want to add or would like to make the Ohio Power Siting Board aware of, with regard to the pipeline as it's proposed to be routed through Sycamore Township?**

I think as the pipeline's proposed, it will severely damage property values because of what will occur with pipeline construction, whether it's taking trees down, whether it's locating in someone's front yard, or denying them their ability to expand their property in the future.

You are also going to run several risks of where the pipeline is located. With the commercial activity that goes on and the constant construction activity that always goes on, you always run the risk of pipeline damage.

But most importantly, you have the potential to damage the economic health of Sycamore Township because it could hamper its ability for economic development. It is a problem because it constrains the amount of development that can occur in its vicinity.

Respectfully submitted,

**/s/ R. Douglas Miller**

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Telephone: (513) 891-7087

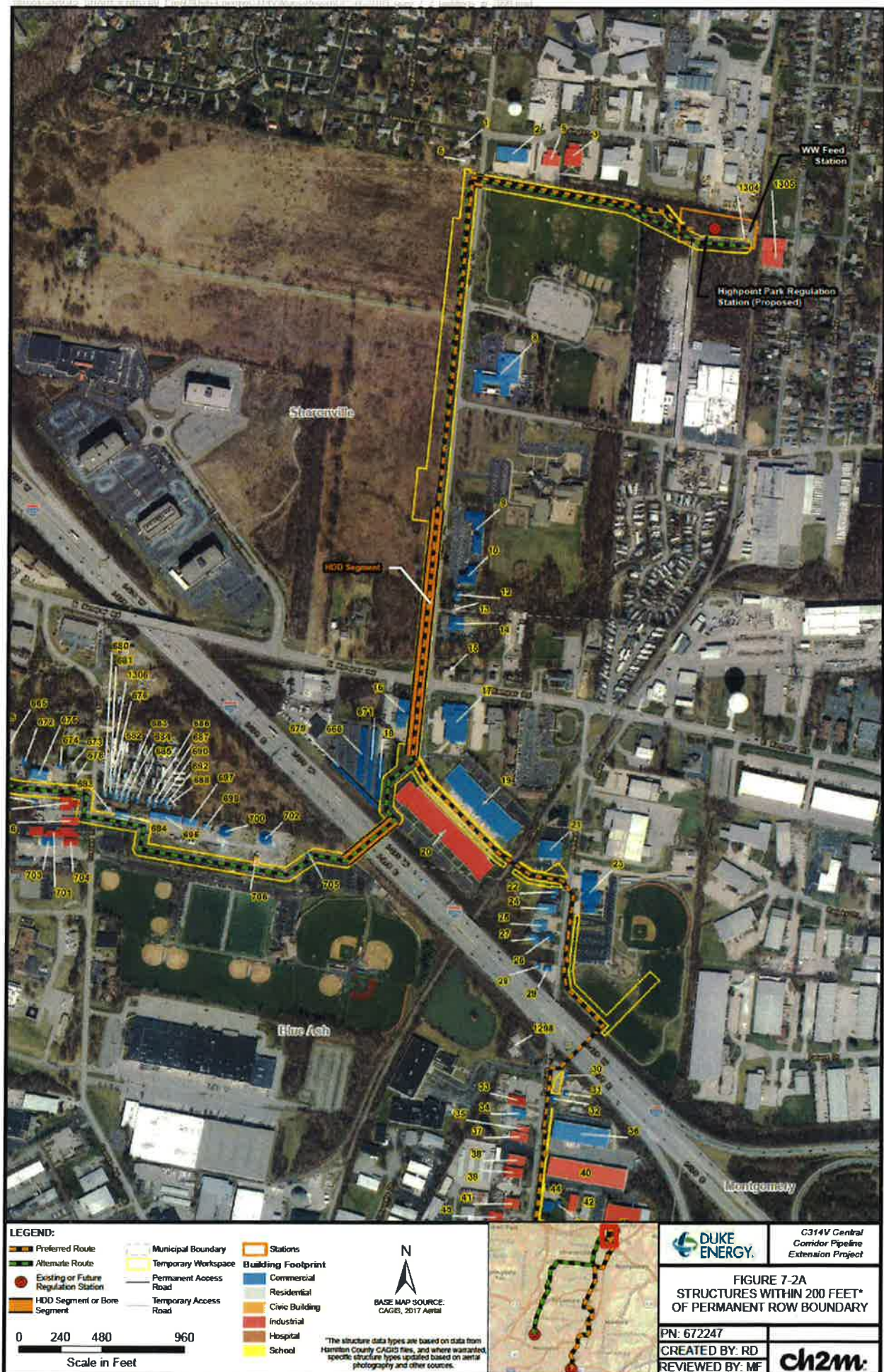
Facsimile: (513) 891-7125

E-mail: [miller@donnellonlaw.com](mailto:miller@donnellonlaw.com)

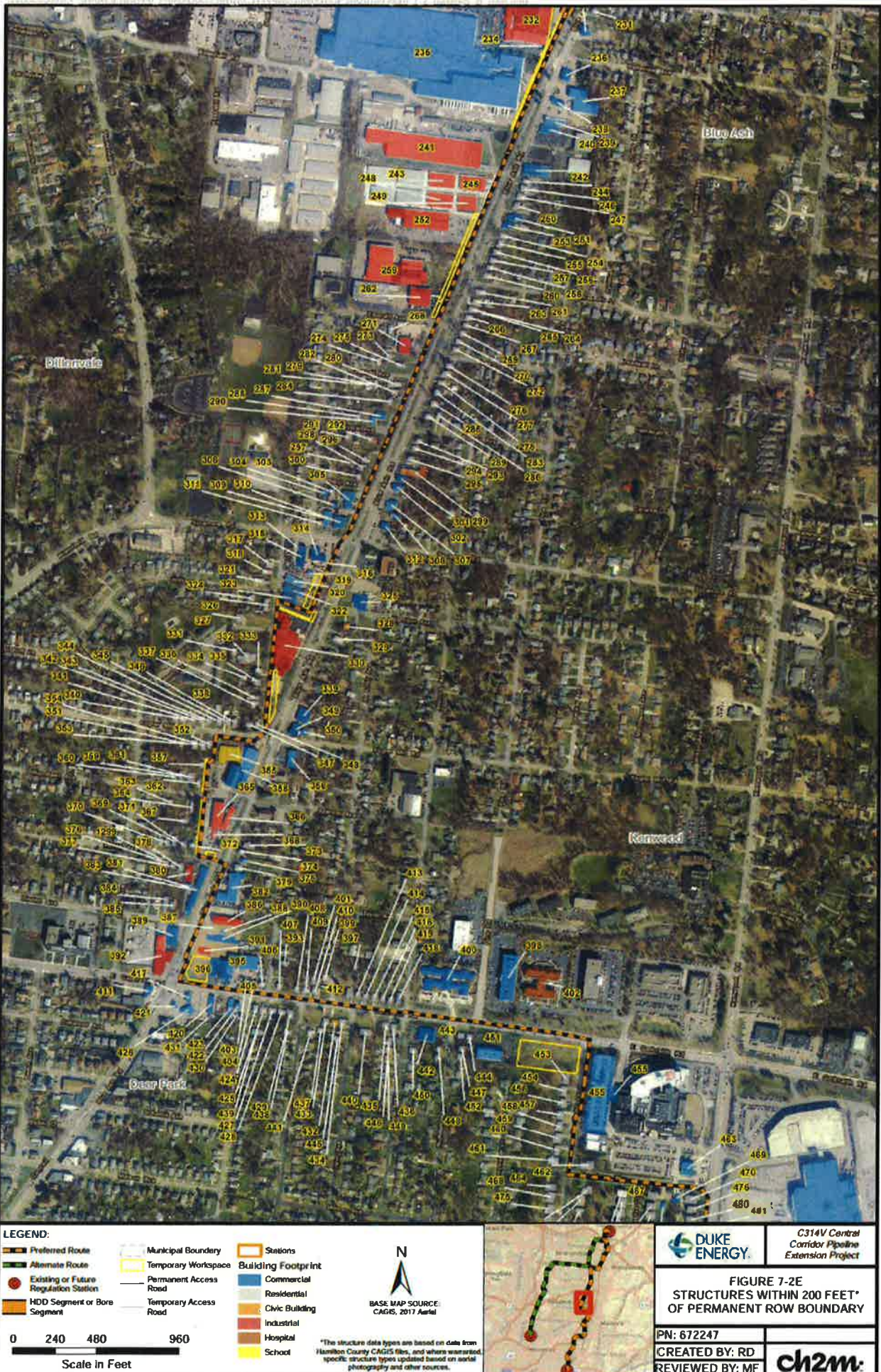
*Attorneys for Thomas J. Weidman, President*

*Board of Township Trustees of Sycamore Township,  
Ohio and Sycamore Township*

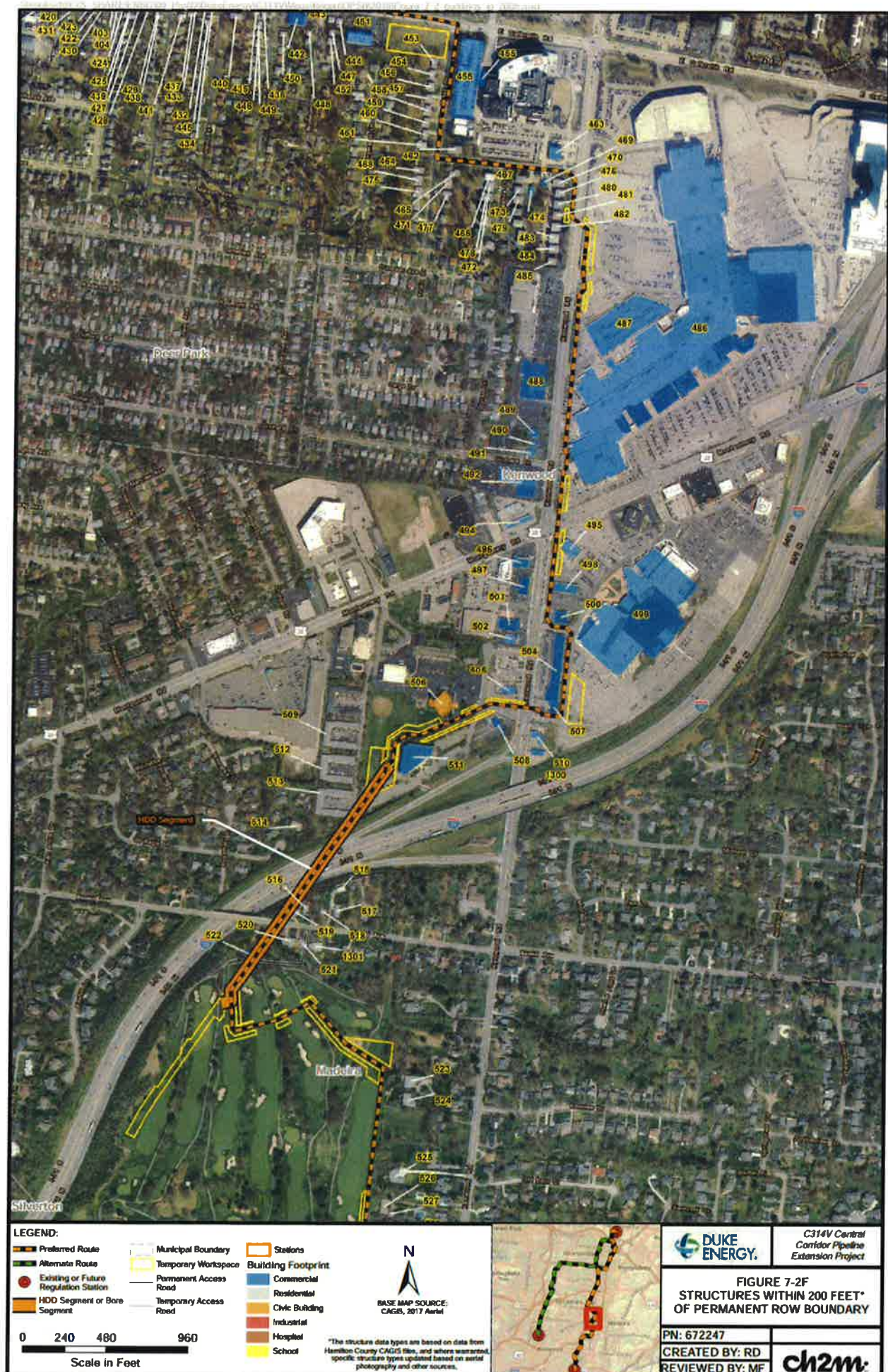














## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties who have electronically subscribed to this case through the Docketing Information System of the Public Utilities Commission of Ohio and the OPSB on this 2<sup>nd</sup> day of April, 2019. The docketing division's e-filing system will electronically serve notice of the filing of this document on the following parties:

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The following parties have not been served via the email notice and have been served by regular U.S. Mail on the same date indicated above:

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9528 Bluewing Terrace  
Blue Ash, OH 45241

Thomas A. and Patricia H. Kreitinger  
6150 St. Regis Dr.  
Cincinnati, OH 45236

/s/ R. Douglas Miller  
R. Douglas Miller (0033343)  
Counsel for Sycamore Township

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/2/2019 11:12:46 AM**

**in**

**Case No(s). 16-0253-GA-BTX**

Summary: Testimony of Greg Bickford on Behalf of Sycamore Township, Hamilton County, Ohio electronically filed by Mr. R. Douglas Miller on behalf of Sycamore Township, Hamilton County, Ohio and Weidman, Thomas J. Mr.