BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of Republic Wind, LLC for a Certificate to Site Wind Powered Electric Generating Facilities in Seneca and Sandusky Counties, Ohio	))))	Case No. 17-2295-EL-BGN

DIRECT TESTIMONY OF ROBERT CHAPPELL ON BEHALF OF THE LOCAL RESIDENT INTERVENORS

Q.1. Please state your name and home address.

A.1. My name is Robert Chappell. I reside with my wife and two sons at 8475 East County Road 38, Republic, Ohio 44867. Our home is located in Adams Township, Seneca County and is surrounded by the footprint of the Republic Wind project.

Q.2. What is your educational background?

A.2. I graduated from the University of Toledo with my Bachelor's of Business Administration in 1999. I continued my education at local vocational schools and attained certifications in Ohio as a Paramedic and Level II Firefighter, Fire & Life Safety Inspector, EMS Instructor, Fire Instructor, and Live Fire Instructor.

Q.3. What is your occupation?

A.3. I serve as the Deputy Fire Chief of the Tiffin Fire/Rescue Division located in Tiffin, Seneca County, Ohio. In this role, I utilize each of my previously listed state certifications.

Q.4. Please provide an overview of your occupational experience.

A.4. I have been the Deputy Fire Chief for 4 years and have been a member of the Tiffin Fire/Rescue Division more than 15 years. My division provides EMS and fire coverage

to the City of Tiffin, are contracted by two townships to provide EMS services, and participate in the Seneca County Auto Aid agreement providing manpower and apparatus as needed to the neighboring fire departments. I became an EMT-Basic in 2000 and volunteered in the Seneca County EMS system in both Green Springs and Republic. This agency is currently comprised of six volunteer staffed ambulances and maintains a single paid ECHO unit (one paramedic responding from a central location to assist with Advanced Life Support capabilities or staffing). Wanting to increase my knowledge, skills, and abilities to enhance patient care, I began working for MedCorps Ambulance, a private ambulance company, and also returned to school and became an Advanced EMT. Seeing that most municipal EMS systems are run in conjunction with fire departments, I completed the 240 hour program to obtain my Level II, aka Professional, Firefighter certification in 2002. I began volunteering with the Scipio-Republic Fire Department immediately. In an effort to increase my likelihood of being hired at a fire department, I also attended the 16-month paramedic program while working for a small, rural municipal ambulance district in Hancock County. In April, 2004 I received my state certification after passing the National Registry of Emergency Medical Technicians exam. To increase the number of patient encounters I would experience, I took a position with Sandusky County EMS as a paramedic working there until I accomplished my goal of working as a full-time firefighter/paramedic in August 2004 at Tiffin Fire/Rescue Division. From 2006-2018, I have worked to obtain the remaining certifications which I currently maintain. I was promoted to Deputy Fire Chief in 2015. In the last 19 1/2 years, I have attained experience as a volunteer EMT and firefighter (including service in the

area that is now in the Republic Wind project), worked in private and municipal EMS systems, and am now a chief officer of a full-time fire department.

Q.5. On whose behalf are you offering testimony in this case?

A.5. I am offering testimony on behalf of Intervenors Joseph & Diane Anderson, Denise Bell, Aaron & Carrie Boes, Richard & Linda Bollenbacher, Rob & Mary Chappell, Thomas & Kathleen Fries, Leslie & Dennis Hackenburg, Jeffrey & DeeAnne Hamilton, Allen & Mary Hassellbach, Duane & Deb Hay, Ethan & Crystal Hoepf, Gary & Dawn Hoepf, Jason & Michelle Hoepf, Taylor Hoepf, David P. Hoover, Jeffrey A. Hoover, Kenneth & Debra Hossler, Greg & Laura Jess, Mike & Tiffany Kessler, Leonard & Beverly Kubitz, Gary & Michelle Miller, Steven & Kelley Miller, Kim Mitchell, Charles & Linda Morsher, Patricia Motry, Steven & Linda Mulligan, Doug & Jennifer Myers, Linda Niederkohr, Kevin & Jennifer Oney, Nicholas & Michelle Reiter, Tom & Lori Scheele, Elaine Schultz, James & Victoria Seliga, Eugene & JoAnn Smith, James & Elaine Steinmetz, Herman & Patricia Studer, Christine Vogt, Mark Weber & Cindra Riley, Charles & Rhonda Weyer, Ann Wright, and Chris & Danielle Zeman (together, the "Local Residents").

Q.6. Where do you and your family live in relation to the turbine sites planned for the Republic Wind facility?

A.6. My wife Mary Chappell, our children, and I live along County Road 38 east of State Route 19 in Adams Township, Seneca County. According to Republic Wind's application, our home and property are located near a number of turbine sites. The attached Exhibit A is a map showing the location of our property within the rose-colored rectangular lines, with yellow lines drawn between our property and proposed Republic

Wind turbine sites. The five nearest proposed turbine sites are shown as "+" symbols in red circles. The distance in feet between each of these turbines and our property is shown next to each of these turbine sites. The locations for the five turbine sites are based on the latitudes and longitudes for Turbine Sites with FAA turbine numbers T4, T7, T9, T10, and T11 provided by the Supplement to the Staff Report of Investigation. Page 7 of this report is attached as Exhibit B.

Q.7. Have you assisted with any other exhibits sponsored in the written direct testimony of other witnesses for the Local Residents?

A.7. Yes. I assisted with Exhibit A of Aaron Boes' testimony, Exhibit A of Crystal Hoepf's testimony, Exhibit A of Dawn Hoepf's testimony, Exhibits A and C of Ann Wright's testimony, and Exhibit A of Chris Zeman's testimony.

Q.8. How did you assist with those exhibits?

A.8. The maps had been created by Deb Hay. My role was to verify the maps for accuracy. Using the Seneca County Auditor's website, I was able to determine the property lines for these specific listed property owners. Using the latitude and longitude coordinates from page 7 of the Supplement to the Staff Report of Investigation (Exh. B hereto), I was then able to plot the turbines into Google Maps. This website also provides a distance measuring feature which produced a specific point to point measurement. The measurement from the turbine to the nearest point to the affected property was used in each case. My findings were very similar to the original mapped distances, which provide a fair representation as to the locations and distances of the proposed turbines and property lines of the six property owners. That is, my distance measurements and Deb Hay's distance measurements varied by no more than 10 feet for any of the distances.

Q.9. What recreational activities, if any, do you and your family enjoy in your yard?

A.9. My wife, who is a Registered Nurse, and I use the outdoors to decompress from the cumulative stresses we encounter at work. We built our home in 2004 to raise our family and have invested heavily into it to make as many lasting memories as we can. We were so excited to be able to buy the portion of land for our home from my wife's family who has farmed it for generations. When we built the house we also contracted to have a pond dug near the back of the property. I have watched my sons grow up fishing in this pond but have also been fortunate to enjoy watching nature, including many types of birds by day and bats in the evenings commonly flying around our pond to feed on insects. I have seen as many as approximately 20 bats at the same time near the pond.

Q.10. Have you seen any Bald Eagles in or near the Project Area for the Republic Wind project?

A.10. Yes.

Q.11. When and where did you see these Bald Eagles?

A.11. On March 19, 2019, my wife video recorded two eagles which had been seen on a couple of occasions flying above our home. I was present at this time and personally witnessed the two eagles. On July 11, 2019, I saw and videotaped a Bald Eagle sitting on the ground next to the pond in our yard. A copy of a frame of that video is attached as Exhibit C. On the evening of September 23, 2019, I saw one Bald Eagle on the ground next to my pond and another Bald Eagle simultaneously sitting in a tree on the south side of the woods behind our property. This is approximately 1,175 feet from the base of the proposed T13 turbine site. On the morning of October 12, 2019, I saw a Bald Eagle sitting on the ground along County Road 38 near the Republic Wind Project Area. On

about a dozen occasions in 2019, I have seen one or more Bald Eagles flying over or near my property towards the proposed turbine sites north of my property. Some of these eagles have circled above my property before heading north. On two occasions in around June of 2019, I saw a Bald Eagle in a tree along County Road 38 east of my home. Some time in 2018, I saw two Bald Eagles flying above a field east of State Route 18 and north of County Road 46. All of the Bald Eagles mentioned in this answer were mature adults, *i.e.*, they had white heads, except that one of the eagles seen on March 19, 2019 was an immature eagle with a brown head. On Exhibit D attached hereto, I have marked the locations of these eagle sightings on a copy of Figure 2 of Exhibit E of Republic Wind's application dated December 26, 2018. My handwritten circle shows the area where I saw the eagles on my property and flying above and near my property. The locations of the other eagle sightings are marked with handwritten "X"s.

Q.12. Have you seen any eagle nests near the Republic Wind's Project Area?

A.12. Yes, I have seen one Bald Eagle nest in that area.

Q.13. Where is this Bald Eagle nest located?

A.13. The nest is located to the south of East Township Road 180. On Exhibit E attached hereto, I have marked the nest's location on a copy of Figure 2 of Exhibit E of Republic Wind's application dated December 26, 2018.

Q.14. Have you seen any Bald Eagles at that nest?

A.14. Yes, in 2015 I saw a mature Bald Eagle fly out of the nest. I looked at nest on October 25, 2019 to confirm that the nest is still there and found that it is.

Q.15. Do you and your family engage in other activities in which you watch birds?

A.15. Yes, we like to walk through several wildlife areas and observe the birds. My wife and I do this about five times per year at the Miller Conservation Farm, about three to four times per year at the Garlo Nature Preserve, and about once per year at Magee Marsh. Miller Conservation Farm is located in or near the Republic Wind Project Area. Garlo Nature Preserve and Magee Marsh are located in the Mississippi Flyway for migrating birds.

Q.16. Do you have any experience with emergency aviation evacuation services?

A.16. Yes. Life Flight or other air ambulances services are used throughout Seneca County. There is only one hospital, Mercy Hospital of Tiffin, located in the county. It is not accredited as a trauma center, nor does it have the capability of performing emergency heart catheterizations. When a patient is identified in the pre-hospital setting as needing a trauma center or if they would be experiencing a ST elevation myocardial infarction (STEMI), our protocols call for the activation of an air ambulance.

Q.17. Do you have any concern about the potential impact of the Republic Wind project on emergency aviation evacuation services?

A.17. Yes, I have a number of concerns.

Q.18. What are those concerns?

A.18. The Republic Wind Project Area receives EMS services currently from two providers. A private ambulance company, North Central EMS, staffs one ambulance from a station in Green Springs. The remainder of the Project Area is covered by Seneca County EMS. Seneca County EMS has a fully volunteer staffed ambulance in each of the six villages throughout the county. Unfortunately, there are many occasions when one or more ambulances may be out of service simultaneously due to staffing issues. The result is that

the next closest ambulance would respond on the emergency call, increasing the amount of time until care may be initiated at the accident scene. Many of the roadways in the Project Area are two-lane, non-divided highways with 55 mph speed limits, and traffic accidents in and near the Project Area are not uncommon occurrences on these roads. For example, there have been several severe accidents at the corner of County Road 38 and State Route 19, which is located next to the border of the Project Area, and which required the use of one or more air ambulance helicopters to transport victims to definitive care in Toledo. The inability to use this type of rapid transport may have resulted in great detriment to these trauma victims. However, the Republic wind project will slow down the helicopter response to some accidents in the Project Area. Apex has offered to construct a single pre-determined landing zone within the Project Area. A major problem with this plan is that it fails to address a situation in which there are multiple patients and limited EMS resources, such as a two car accident with more than one injured patient. The EMTs in the first ambulance arriving at the accident scene will determine upon arriving at the scene whether any of the patients are in critical condition and requires transport by air ambulance helicopter. In this event, the two EMTs in that ambulance would triage the patients according to protocol and request a helicopter to transport the critical patient or patients to a medical facility that is qualified to treat their injuries. Ordinarily, this helicopter would land next to the accident scene, so that the critical patients could be loaded directly onto the helicopter. However, if the helicopter cannot land next to the accident scene due to the presence of a nearby wind turbine, the EMTs would have to transport the critical patient or patients to the pre-determined landing zone. Ohio law requires both of the EMTs to accompany that patient in the

ambulance. If any other persons have sustained critical or minor injuries, the EMTs are not allowed to leave the other patients at the accident scene without EMT care in order to transport the first critical patient to the pre-determined landing zone. This means that they cannot transport the first critical patient to the helicopter until another ambulance with EMTs arrives from a more distant village. If the ambulance from the next closest village is available, waiting for this ambulance to arrive would result in a 10 to 15 minute delay in transporting the first critical patient(s) to the pre-determined landing zone, or any other landing area that is not next to the accident scene. If the ambulance from the next closest village is not available, the delay would be even longer. The critical patient(s) would be treated but EMT's would be required by law to remain at the scene until additional EMT's arrive to transfer patient care. Time is the most valuable asset to a trauma victim or person having a heart attack. Any added delay in their care may decrease their ability to recover.

Q.19. What, if any, interaction have you had with any Apex Clean Energy representatives about participating in the Republic Wind project?

A.19. Three persons identifying themselves as Apex Clean Energy representatives have been to my home on separate occasions. Two of them came to my home without appointments and the third left a business card requesting to speak with me. I later spoke with him by telephone. Each one asked me to sign a "Good Neighbor Agreement" to waive my rights to oppose the project and to waive setback requirements in exchange for payments of $500 per year.

Q.20. Did you sign the agreement?

A.20. No.

Q.21. Did you inform Apex's representatives as to your reason for not signing the agreement?

A.21. I informed each Apex representative that I would not sign it because of the harm the project would cause.

Q.22. How did the Apex representatives react after you informed each of them that you would not sign the agreement?

A.22. The first representative expressed disbelief that I was unwilling to be a part of what he characterized as such a "great thing" for the area. The second representative, with whom I spoke by phone, discussed how property values would not be negatively affected by the project. He gave up trying to convince me to sign when I asked him if he knew of anyone who ever sought out a home to buy situated in the center of four to five turbines as my home will likely be. On the final occasion, the representative, upon being told there was no way I would sign, became belligerent and accused me of not caring about what she referred to as "our" children or community. I found her reference to "our" children and community to be odd, since she was driving a car with Florida license plates. To have a stranger stand on my front porch and make such accusations still upsets me to this day. My entire adult life has been spent in service of this community and her actions solidified my belief that this company is not one with whom I would ever do business.

Q.23. Does this conclude your direct testimony?

A.23. Yes.

CERTIFICATE OF SERVICE

On October 28, 2019, the docketing division's e-filing system will electronically serve notice of the filing of this document on the following counsel for the parties: Sally W. Bloomfield (sbloomfield@bricker.com), Dylan Borchers (dborchers@bricker.com), Joshua D. Clark (jclark@senecapros.org), Leah F. Curtis (lcurtis@ofbf.org), Chad A. Endsley (cendsley@ofbf.org), Miranda Leppla (mleppla@theoec.org), Amy M. Milam (amilam@ofbf.org), Mark Mulligan (mulligan_mark@co.sandusky.oh.us), Devin D. Parram (dparram@bricker.com), Chris Tavenor (ctavenor@theoec.org), Trent Dougherty (theoec.org), Dane Stinson (dstinson@bricker.com), Derek Devine (dwd@senecapros.org), and Jodi Bair (jodi.bair@ohioattorneygeneral.gov). On the same date, I served a copy of this filing by electronic mail on the above-listed counsel, Dennis Hackenburg at Dennyh7@frontier.com, and Mike and Tiffany Kessler at mkessler7@gmail.com.

/s/ Jack A. Van Kley
Jack A. Van Kley

EXHIBIT A

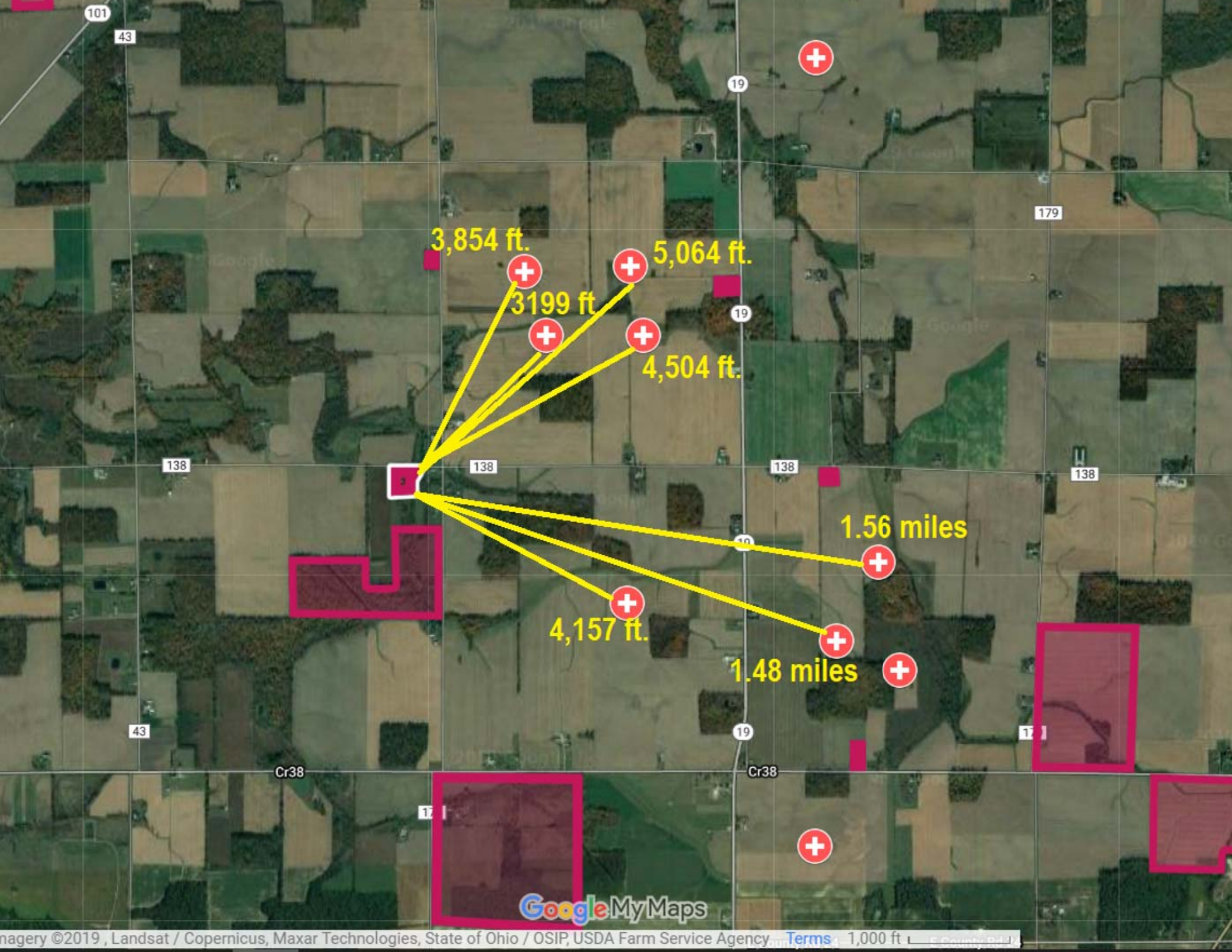

3,854 ft.
5,064 ft.
3199 ft
4,504 ft.
1.56 miles
4,157 ft.
1.48 miles
Cr38
Cr38
101
43
19
179
138
Google My Maps
magery ©2019 , Landsat / Copernicus, Maxar Technologies, State of Ohio / OSIP, USDA Farm Service Agency
Terms
1,000 ft

EXHIBIT B

EXHIBIT C

EXHIBIT D

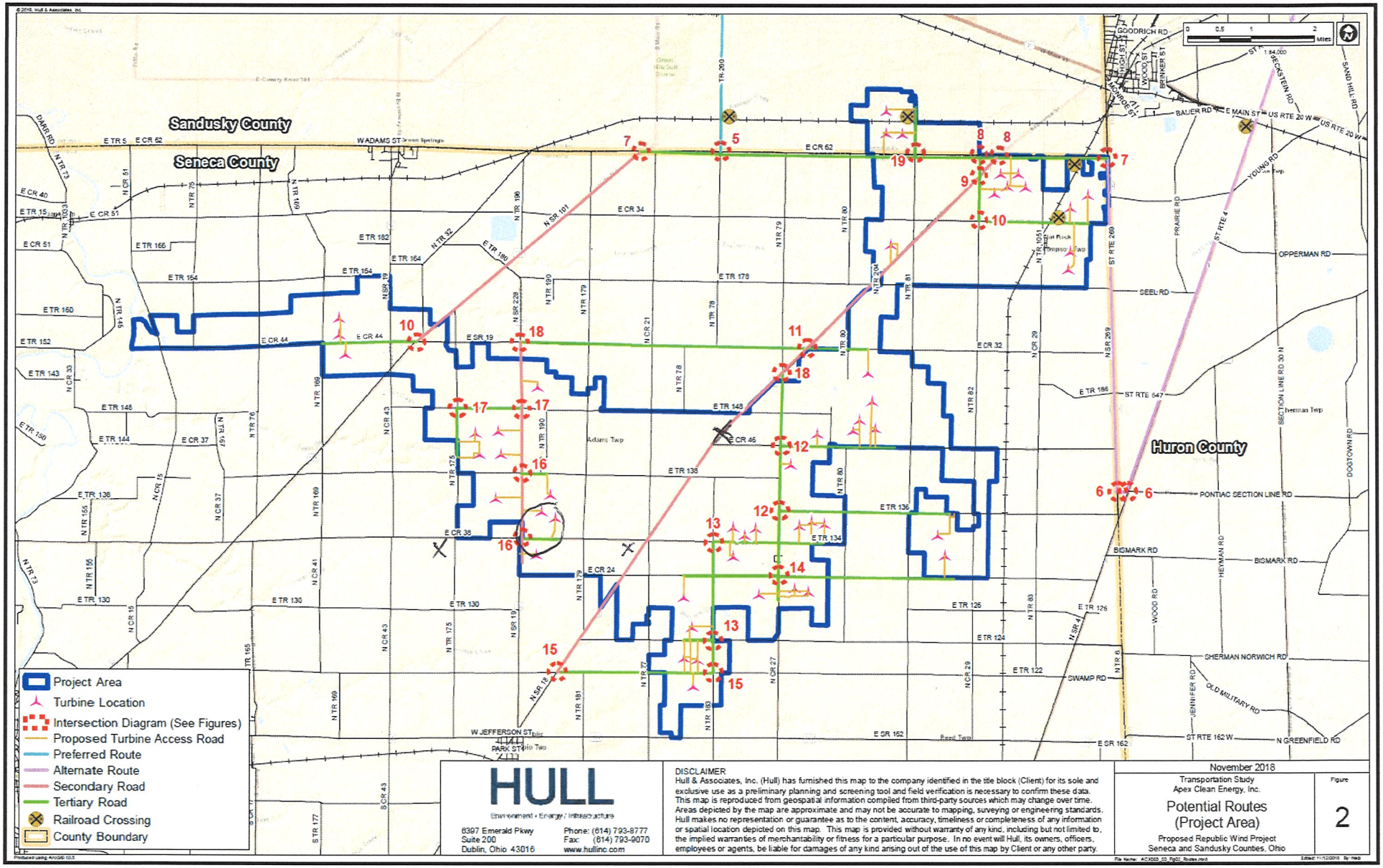

Sandusky County
Seneca County
Huron County
Project Area
Turbine Location
Intersection Diagram (See Figures)
Proposed Turbine Access Road
Preferred Route
Alternate Route
Secondary Road
Tertiary Road
Railroad Crossing
County Boundary
HULL
Environment • Energy / Infrastructure
6397 Emerald Pkwy
Suite 200
Dublin, Ohio 43016
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November 2018
Transportation Study
Apex Clean Energy, Inc.
Potential Routes
(Project Area)
Proposed Republic Wind Project
Seneca and Sandusky Counties, Ohio
Figure
2

EXHIBIT E

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 17-2295-EL-BGN

Summary: Testimony of Rob Chappell electronically filed by Mr. Jack A Van Kley on behalf of Local Resident Intervenors