

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)	
Paulding Wind Farm III LLC for a)	
Certificate of Environmental)	Case No. 15-1737-EL-BTX
Compatibility and Public Need for the)	
Timber Road III Transmission Line)	
)	

DIRECT TESTIMONY OF BENJAMIN BRAZELL

Q.1. Please state your name, title and business address.

A.1. My name is Benjamin Brazell. I am Principal and Director of Environmental Services for Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C ("EDR"). My business address is 217 Montgomery Street, Suite 1000, Syracuse, New York 13202.

Q.2. What are your duties as Director of Environmental Services?

A.2. As Director of Environmental Services, I am responsible for overseeing EDR's environmental projects, which include those associated with the construction of wind electric generating and transmission facilities.

Q.3. What is your educational and professional background?

A.3. I earned my BS in Natural Resources from North Carolina State University in 2001. After graduating from North Carolina State, I was environmental scientist for EcoScience Corporation from 2001-2004. I joined EDR in 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 approximately 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. A statement of my educational background and professional qualifications is attached as Exhibit 1 to my direct testimony. EDR has over 25 years of experience with siting, impact analysis, and permitting associated with electric transmission facilities.

Q.4. On whose behalf are you offering testimony?

A.4. I am testifying on behalf of the Applicant, Paulding Wind Farm III LLC.

Q.5. What is the purpose of your testimony?

A.5. The purpose of my testimony is to summarize the studies completed in connection with the application and address any environmental concerns related to the project.

Q.6. Did you review the December 8, 2015 application for the Timber Road III Transmission line and the February 5, 2016 supplement to the application, including the studies that were completed in connection with the application and the supplement?

A.6. Yes. In addition to reviewing the application, the supplement, and the related studies, EDR supported the preparation of the application and was directly involved with the cultural resources records review, which is attached as Exhibit E to the application, and the ecological investigations including the stream and wetland delineation, which is attached as Exhibit F to the application.

Q.7. Based upon your knowledge of the proposed Timber Road III Transmission Line and experience in the industry, are there any cultural or socioeconomic concerns associated with the construction and operation of the Timber Road III Transmission Line?

A.7. No. Land use in the vicinity of both the Primary and Alternate Facilities is predominantly agricultural, accounting for 94% and 95% of the 1,000-foot Study Areas, respectively. Developed open space (rural residences and associated lawns) and scattered woodlots also occur in the area. There are no residential structures within 100 feet of either the Primary or Alternate Facilities, and no sensitive land uses were identified along either route. Temporary impacts to land use during Facility construction could include damage to crops, fences, gates, subsurface drainage systems (tile lines), and/or temporarily block farmers' access to agricultural fields. However, construction impacts will be temporary in nature, followed by site restoration, and confined to the properties of participating landowners. Only very minor changes in land use are anticipated within the easement for the Primary Transmission Route as a result of facility operation.

The purpose of the cultural records review conducted by EDR was to identify known cultural resources in the vicinity of the facility so that impacts to such resources can be minimized. The records review revealed that no NRHP-listed properties, OAI properties, or NHL properties have been recorded within 1,000 feet of the Primary or Alternate Transmission Routes and POI Substation Locations. Two OGS cemeteries and two OHI properties have been recorded within 1,000 of the Primary or Alternate Transmission Routes. There will be no direct impacts to above ground cultural resources, and because construction and operation of the facility will not physically alter any known cultural resources, potential impacts are limited to indirect visual effects. Although the Primary and Alternative Transmission Routes have not been systematically surveyed for archaeological resources, an archaeological survey for those portions of the proposed

Facility where direct ground disturbance is proposed may be conducted, if required, after the final route has been selected and all land rights procured.

Q.8. Based upon your knowledge of the proposed Timber Road III Transmission Line and experience in the industry, are there any ecological concerns associated with the construction and operation of the Timber Road III Transmission Line?

A.8. No. In support of the application for the Timber Road III Transmission Line, EDR conducted and coordinated ecological investigations within the transmission line study areas – within 1,000 feet of either side of the centerline of the primary transmission route and the alternative transmission route. These investigations included wetland and stream delineations within the ROWs. Nine intermittent streams were identified, including Wildcat Creek and Flatrock Creek, with approximately 2,855 feet of linear stream within the construction corridor, 1650 feet of which are agricultural drainage ditches. Three wetlands were delineated, totaling 3.63 acres within the primary ROW. Although these ecological features have been identified in the primary study area, the Applicant has committed to avoidance measures during construction to minimize impacts to streams and wetlands, including environmental training, limited tree clearing and, where necessary, tree clearing by hand within 25 feet of any stream channel, monitoring, and site restoration. Furthermore, the construction and operation of the transmission line will not require any in-water work; clearing of the forested riparian corridor along Flatrock Creek will be limited to 0.45 acres; and all tree clearing will be completed during the seasonal tree cutting season to avoid possible impacts to the Indiana Bat and Northern Long Eared Bat.

Q.9. Does the primary transmission route provide any benefit over the alternate route?

A.9. Yes. The primary transmission route provides social and environmental benefits over the alternate route. Notably, the primary transmission route is a shorter more direct route, traversing approximately 8.5 miles of land comprised of 27 separate parcels compared to the alternate route being approximately 11.6 miles long and comprising 41 separate parcels, which equates to less land disturbance. In addition, the primary route is sited on parcel owned by landowners willing to participate in the project, and on parcels that primarily flat, dominated by agricultural use, have existing access through established farm lanes and roads, and have essentially no environmental constraints with the exception of the crossing of Flatrock Creek.

Q.10. Does this conclude your direct testimony?

A.10. Yes, it does.

CERTIFICATE OF SERVICE

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Summary: Testimony Direct testimony of Benjamin Brazell electronically filed by Mr. Ryan D. Elliott on behalf of Paulding Wind Farm III LLC