

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE JOINT PETITION)
OF NORFOLK SOUTHERN RAILWAY)
COMPANY AND CSX TRANSPORTATION,)
INC., TO CLOSE THE FRANKLIN STREET) Case No. 19-180-RR-UNC
CROSSINGS (DOT NOS. 481482D AND)
518257V) IN ORANGE TOWNSHIP,)
DELAWARE COUNTY, OHIO)

**PREPARED DIRECT TESTIMONY OF PATRICK BRANDT ON BEHALF OF
INTERVENORS DELAWARE COUNTY BOARD OF COMMISSIONERS**

DELAWARE COUNTY
BOARD OF COMMISSIONERS

/s/ Aric I. Hochstettler

Aric I. Hochstettler (0081081)
Staff Attorney
91 North Sandusky Street, First Floor
P.O. Box 8006
Delaware, Ohio 43015
740.833.2118 – *Telephone*
740.833.2099 – *Facsimile*
AHochstettler@co.delaware.oh.us

*Counsel for Delaware County
Board of Commissioners*

**PREPARED DIRECT TESTIMONY
OF PATRICK BRANDT**

Q: Please state your name and business address.

A: My name is Patrick Brandt. My business address is 10 Court Street, Delaware, Ohio 43015.

Q: By whom are you employed?

A: I am employed by the Delaware County Board of Commissioners.

Q: What is your current position with the Delaware County Board of Commissioners?

A: I am currently the Director of Emergency Communications for Delaware County. This includes the county's 9-1-1 system and the countywide public safety communications system.

Q: How long have you held this position?

A: I started in my current position on December 7, 2015.

Q: What are your duties as Director of Emergency Communications?

A: My duties include general oversight of the day-to-day operation of the Delaware County 9-1-1 call center, dispatching for first responder organizations within Delaware County, and the public safety radio system utilized by those first responder organizations within Delaware County.

Q: Who are the current Delaware County Commissioners?

A: Jeff Benton, Barb Lewis, and Gary Merrell.

Q: Are you authorized to appear and testify on behalf of the Delaware County Board of Commissioners in this proceeding?

A: Yes.

Q: Are you familiar with the railroad crossings in the unincorporated village of Lewis Center that are the subject of this proceeding?

A: Yes. I understand a petition has been filed to close the existing railroad crossings for CSX and Norfolk Southern on Franklin Street in Lewis Center. I am personally familiar with the crossings in question and the impact closure would have on emergency response within Delaware County.

Q: What is your understanding of the Delaware County Board of Commissioners' interest in this proceeding from the perspective of emergency response?

A: Specifically, Delaware County operates an emergency medical services station at the intersection of Third Street and Franklin Street in Lewis Center, directly adjacent to the crossings in question. This is known as Delaware County EMS Medic Station 3 because the actual ambulance vehicle stationed there is Medic 3. Medic 3 is the primary responding emergency medical services ambulance for areas both east and west of the

1 railroads in Lewis Center, raising concerns about the impact closure of the Franklin Street
2 crossings would have on emergency response.
3

4 **Q: How are emergency services dispatch and response conducted in Delaware County?**

5 A: In the easiest to understand terms, a caller that dials 9-1-1 within our service area, which
6 includes all of Delaware County, except for the municipalities of Columbus, Westerville,
7 and Dublin, is connected to one of our dispatchers in the Delaware County 9-1-1 center.
8 We utilize what is referred to as a computer-aided dispatch system (or “CAD” system)
9 that allows our dispatchers to properly identify the primary fire and EMS agency to
10 dispatch the appropriate first responders. Our department handles dispatch for all fire,
11 EMS, and law enforcement within entities within our service area, except for the
12 Delaware County Sheriff’s Office, which has its own dispatchers in our call center.
13 Through the information provided by the caller, the CAD system identifies the
14 department and specific vehicles to respond to an incident, based on “run card” data that
15 is uploaded to the system. The “run cards” are submitted by local department chiefs and
16 indicate the order of response, the apparatus to respond, and backup priority in the event
17 of unavailability, coded by the specific type of event. The CAD system records the
18 precise time of the call, the time of dispatch, and the time the responding unit is on scene.
19

20 **Q: Focusing on the area pertinent to this matter, the location of the railroad grade**
21 **crossings in Lewis Center, what “run card” controls dispatch and response**
22 **protocols?**

23 A: First, I should clarify that law enforcement response is very different than fire and EMS
24 response, since fire and EMS are generally station-based and static. Exceptions are when
25 specific units are on active runs or returning to the station from active runs, which alters
26 their status in our system. Assuming the general static condition, however, Medic 3 is the
27 primary responding EMS unit in the run card areas identified as 361-M3-1, 362-M3-1,
28 362-M3-2, and 362-M3-3. The first part of those identifiers (361 and 362) are for the
29 primary fire response unit, which is Orange Township Fire Department. The second part
30 of those identifiers (M3) is for the primary EMS response unit, which is Delaware
31 County Medic 3. In Lewis Center, the railroad serves as the dividing line between area
32 361-M3-1 (west) and 362-M3-3 (east). These areas are shown in what has been identified
33 as Delaware County Exhibit 3, which is the run card map for Orange Township.
34

35 **Q: Who has authority over the run cards for fire and EMS?**

36 A: The local fire chief has authority over the run cards for fire and EMS. Even though
37 Delaware County EMS is an independent agency under the authority of the Board of
38 County Commissioners, it is the Orange Township Fire Chief that controls the order and
39 priority of dispatch within Orange Township, including Medic 3. In the case of Lewis
40 Center, the Orange Township Fire Chief has determined that Medic 3 is the primary EMS
41 responder for that area.
42

43 **Q: Are there times when Medic 3 is not the primary EMS responder for the Lewis**
44 **Center area?**

45 A: Yes. There have been times when both the Lewis Center Road crossings and Franklin
46 Street crossings are closed, which results in a temporary change to the run cards with

1 Orange Township Medic 361 taking over primary EMS response west of the railroad
2 tracks. The longest time period in recent years for this change was in 2019 when the
3 roundabout at the intersection North Road and Lewis Center Road was being constructed,
4 which resulted in closure of Lewis Center Road from April 8, 2019, to October 4, 2019.
5

6 **Q: What impact to EMS response times occur when Medic 3 is not able to serve the**
7 **Lewis Center area west of the railroad tracks?**

8 A: In preparation for this matter, I pulled a report from our CAD system with all responses
9 in this area, which is run card 361-M3-1, for 2018, 2019, 2020, and 2021 (through
10 August 23). This report is identified as Delaware County Exhibit 4. A review of this data
11 indicates that response times to some of our frequent run destinations in this area were
12 higher from Orange Township Medic 361 than Delaware County Medic 3, which
13 supports the Fire Chief's ongoing decision to designate Medic 3 as the primary EMS
14 responder for this area. This response time is even more important when taking into
15 consideration high priority calls, such as chest pain, difficulty breathing, unresponsive
16 persons, and stroke symptoms. As illustrations, I identified a few example properties as
17 frequent run destinations: (1) 6515 Pullman Drive, which is an OSU Wexner Medical
18 Center outpatient facility; (2) 675 Lewis Center Road, which is Olentangy High School;
19 (3) 1081 Lewis Center Road, which is Lewis Center United Methodist Church; and (4) a
20 home within the unincorporated village of Lewis Center, located at 1338 Franklin Street.
21 I then examined the times in our CAD system for the respective units to respond, based
22 on the units marking "en route" to the time they mark "on scene." The facility at 6515
23 Pullman Drive is the closest of the identified locations to Orange Township Station 361,
24 but in a review of the data Medic 3 still has a shorter response time on average to this
25 location. In addition, when Medic 3 and Orange Township Station 361 simultaneously
26 responded to 6515 Pullman Drive, Medic 3 arrived on scene earlier in all but two
27 occurrences. Medic 3 also has shorter response times, on average, to Olentangy High
28 School and Lewis Center United Methodist Church. As for the residences on Franklin
29 Street, Medic 3 has been able to respond to 1338 Franklin Street in less than two minutes
30 for all but one run during the report period. Responses from Orange Township Station
31 361 were approximately three times longer. While it would be easy to focus on national
32 response time standards, minutes and sometimes even seconds are the difference between
33 a positive and negative outcome in a medical emergency.
34

35 **Q: What impact would the closure of the railroad crossings at Franklin Street have on**
36 **emergency response in the Lewis Center area?**

37 A: Closing the railroad crossings at Franklin Street would negatively impact emergency
38 response to the area west of the railroad tracks, most notably within the unincorporated
39 village of Lewis Center itself but also in areas further to the west that generate a high
40 volume of EMS runs, such as the schools between Lewis Center Road and Shanahan
41 Road and the commercial development at the intersection of Lewis Center Road and US
42 Route 23. As indicated by an analysis of runs since 2018, response times from Orange
43 Township Station 361 to this area consistently take longer than from Medic 3. Franklin
44 Street serves as a vital alternative to Lewis Center Road, which is frequently congested,
45 especially at the railroad crossings. Medic 3 can respond to areas within the
46 unincorporated village of Lewis Center directly via the Franklin Street crossings.

1 Franklin Street also serves as an alternate in the event Lewis Center Road is blocked for
2 any reason. Our CAD system only allows for previously identified closures, which means
3 unexpected obstacles or delays in response cannot be factored into the CAD system.
4 Having alternate routes provides flexibility to the Medic 3 in responding west of the
5 railroad tracks. This will remain of vital importance until such time as the Home Road
6 grade separation is completed, which will be cause for a complete re-evaluation of
7 response times and run card construction.
8

9 **Q: In your professional opinion, is there a demonstrable need for the railroad grade**
10 **crossings at Franklin Street to remain open?**

11 A: Yes. In my opinion, the crossings should remain open to serve as the primary route for
12 emergency response within the unincorporated village of Lewis Center and areas west,
13 and as an alternate route to Lewis Center Road when it is otherwise unavailable or
14 unreasonable for use, such as times of blockage at the railroad or at peak traffic volume
15 times. In my opinion, this need will exist at least until such time as the Home Road
16 overpass is constructed.
17

18 **Q: Does this complete your prepared direct testimony?**

19 A: Yes. I reserve the right to file rebuttal testimony as warranted based upon further
20 developments in this case.

CERTIFICATE OF SERVICE

A copy of the foregoing document was filed electronically with the Commission this 5th day of October, 2021. Notice of this filing will be sent by operation of the Commission's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Commission's system.

R. Leland Evans, Esq. – revans@dmclaw.com

D. Casey Talbott, Esq. – dctalbott@eastmansmith.com

Julie Donnan, Esq. – jdonnan@bjglaw.net

Jennifer L. Huber, Esq. – jhuber@bjglaw.net

/s/ Aric I. Hochstettler

Aric I. Hochstettler (0081081)

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Summary: Testimony of Patrick Brandt electronically filed by Mr. Aric I. Hochstettler on behalf of Delaware County Board of Commissioners