

Exhibit CS-BW-73

*Docket 8302
Third Supplemental Testimony
of Doris Barton*

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 8302

Petition of Chelsea Solar LLC, pursuant)
to 30 V.S.A. § 248, for a certificate of public)
good authorizing the installation and)
operation of a 2.0 MW solar electric generation)
facility located at 500 Apple Hill Road in)
Bennington, Vermont)

PREFILED SECOND SUPPLEMENTAL DIRECT TESTIMONY
AND EXHIBITS OF DORI BARTON

May 18, 2015

Summary: Ms. Barton's testimony addresses the proposed Chelsea Solar Project's compliance with environmental criteria that are considered in a Section 248 review in light of the Vermont Agency of Natural Resources' request for additional information related to the interconnection route for the proposed Project.

1 **Q. Please state your name, occupation and business address.**

2 Response: My name is Dori Barton. I am an owner and managing partner of
3 Arrowwood Environmental ("AE"), which is an ecological services and consulting firm
4 located at 950 Bert White Road in Huntington, Vermont 05462.

5 **Q. Have you previously testified in this proceeding?**

6 Response: Yes, I submitted pre-filed direct and supplemental testimony on behalf
7 of Chelsea Solar, LLC ("Chelsea Solar") concerning the Chelsea Solar Project.

8 **Q. What is the purpose of your testimony?**

9 Response: In the spring of 2015, Arrowwood Environmental (AE) conducted an
10 environmental assessment for the proposed interconnection route for the Project as related to a
11 suite of environmental resources including streams, shorelines, outstanding resource waters,
12 wetlands, rare and irreplaceable natural areas, necessary wildlife habitat and rare, threatened
13 and endangered animal and plant species.

14 **Q. What work have you conducted with respect to the proposed interconnection route?**

15 Response: AE was retained to conduct an environmental assessment for the proposed
16 interconnection route for the Chelsea Solar Farm solar electric generation facility on Apple Hill
17 Road in Bennington, Vermont. The results of our assessment are reflected in the attached report,
18 *Exhibit CS-DB-5* (the "Report").

Section 248(b)(5): Impact on Aesthetics, Air and Water Purity, Historic Sites, Use of Natural Resources, the Natural Environment and Green House Gas Emissions

Streams

Q. Is the proposed interconnection route located adjacent to or near a stream?

Response: Yes. The stream assessment involved both a remote review of the USGS topographic maps, the Vermont Hydrography Dataset (streams, rivers, waterbodies) and 2' contours derived from FEMA Bennington Lidar (2012) and a field investigation on May 11, 2015. There are a series of small tributaries to the Walloomsac River within the proposed interconnection route.

Q. Will the Project have an undue adverse impact on streams?

Response: No. As set forth in our Report, the proposed interconnection route will result in minimal clearing of trees along Hewitt and Willow Roads. Poles are to be installed within the existing road fill slope resulting in no new

1 disturbance to stream riparian zones. Top of bank stream resources within the
2 proposed route were surveyed on May 11, 2015.

3 **Shorelines**

4 Q. Is the proposed interconnection route located adjacent to or near a shoreline?

5 Response: No. There are no shorelines within the proposed route. The closest
6 shoreline is that of the Walloomsac River, approximately 0.8 miles to the west of
7 the proposed route.

8 Q. Will the interconnection route have an undue adverse impact on shorelines?

9 Response: No. There are no shorelines within the proposed route. The proposed
10 interconnection will have no undue adverse impact on shorelines.

11 **Outstanding Resource Waters**

12 Q. Is the proposed interconnection route located in any segment of waters of the
13 state that have been designated as outstanding resource waters by the Agency of
14 Natural Resources?

15 Response: No. There are no outstanding resource waters within the proposed
16 route.

17 Q. Will the proposed route have an undue adverse impact on outstanding resource
18 waters of the state?

1 Response: No. There are no outstanding resource waters on or near the
2 proposed interconnection route. The proposed interconnection will not have an
3 undue adverse impact on outstanding resource waters of the state.

4 **Wetlands**

5 Q. Is the proposed interconnection route located on or near wetlands?

6 Response: The wetland assessment involved both a remote review of available
7 maps (including Vermont Significant Wetland Inventory maps (VSWI 2010) and
8 the NRCS Soil Survey) and a field assessment on May 11, 2015. Five wetlands
9 were identified, delineated and mapped along the proposed route. There are no
10 vernal pools along the proposed route.

11
12 For the purposes of pole layout, each of the five wetlands is assumed to be Class
13 2 and has been provided a 50' buffer (as shown on the Resource Assessment Map
14 in the Report). The proposed placement results in three poles within wetland
15 buffer zones of three wetlands. The Vermont Wetland Rules (Section 6.22) allow
16 for the installation of a new overhead utility line that does not involve extensive
17 tree clearing, with three poles or fewer in the wetland or buffer zone. The project
18 has been designed to avoid direct wetland impacts. The poles are to be installed
19 within the existing road fill slope resulting in minimal disturbance to wetland
20 buffer areas. It is our opinion that the proposed interconnection will not involve

1 extensive tree clearing and we have requested that Green Mountain Power
2 provide us with confirmation that no wetlands permit will be required.

3 Q. Will the Project (including the proposed interconnection route) have an undue
4 adverse impact on wetlands?

5 Response: No. As set forth in my previously provided testimony, the Project
6 (without the proposed interconnection route) will not have an undue adverse
7 impact on wetlands. This conclusion does not change with the inclusion of the
8 proposed interconnection route in the analysis.

9
10 **Rare and Irreplaceable Natural Areas**

11 Q. Will the Project (including the proposed interconnection route) have an
12 undue adverse impact on rare and irreplaceable natural areas?

13 Response: No. As set forth in my previously provided testimony, the Project
14 (without the proposed interconnection route) will not have an undue adverse
15 impact on rare and irreplaceable natural areas. This conclusion does not change
16 with the inclusion of the proposed interconnection route in the analysis as in
17 reviewing the NNHP digital database, there are no records or occurrences of
18 significant natural communities in or near the interconnection route. Pole
19 placement for the proposed interconnection route will be approximately 10' from
20 the travelled edge of Willow and Hewitt Roads. This area is characterized as

1 mowed road shoulder and existing fill slope. No Rare or Irreplaceable Natural
2 Areas are present within the proposed route.

3
4 **Rare, Threatened and Endangered Species**

5 Q. Will the Project (including the proposed interconnection route) have an undue
6 adverse impact on rare, threatened or endangered species?

7 Response: AE identified very rare, rare and uncommon plant species within the
8 proposed project development area in the summer of 2014. Due to the early
9 season field conditions during the May 2015 field investigation, an RTE plant
10 survey has not yet been conducted along the proposed interconnect route. The
11 RTE survey will be conducted during the summer of 2015. Protocol for this RTE
12 survey are outlined in the RTE Plant Survey Approach for GMP Interconnection
13 Line Area as presented in the Appendix A to the Report.

14
15 Q. Does this conclude your testimony?

16 Response: Yes. This concludes my testimony at this time.