

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 17-5024-PET

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

PREFILED TESTIMONY AND EXHIBITS OF DAVID RAPHAEL

ON BEHALF OF THE DEPARTMENT OF PUBLIC SERVICE

June 22, 2018

Mr. Raphael’s testimony outlines his assessment of the potential impacts of the proposed Chelsea Solar Project with respect to aesthetics and orderly development of the region under 30 V.S.A. § 248(b)(5) and 30 V.S.A. § 248(b)(1).

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Exhibits:

Exhibit PSD-DR-1 Resume of David Raphael

Exhibit PSD-DR-2 Assessment and Review of Aesthetics and Orderly Development
for the Proposed Chelsea Solar Project

1 Q1. Please state your name and business address.

2 A1. My name is David Raphael and I am a Professional Landscape Architect and
3 Planner as well as a Lecturer in the School of Natural Resources at the University
4 of Vermont. I am the Principal and owner of LandWorks, a multidisciplinary
5 planning, design and communications firm based in Middlebury, Vermont. My
6 business address is 228 Maple Street, Suite 32, Middlebury, Vermont 05753.

7 Q2. Please describe your educational background and professional experience.

8 A2. I began my career as landscape architect and planner working for the State of
9 Massachusetts Department of Environmental Management. I have been
10 associated with LandWorks since its inception in 1986. LandWorks serves both
11 public and private sector clients in Vermont and the Northeast. Our areas of
12 expertise include visual, aesthetic and environmental assessments, site and
13 master planning, graphic communications and GIS mapping, permit planning,
14 participatory and community planning, downtown revitalization, open space
15 and conservation planning, zoning ordinance and design review development,
16 landscape architecture and environmental design. At LandWorks, we have
17 worked as advocates and consultants for communities, appellants, the State of
18 Vermont (notably the Department of Public Service) and private corporations.

1 LandWorks has evaluated the aesthetic and environmental impact of
2 transmission lines and corridors; transmission structures; telecommunication
3 facilities; solar projects; biomass facilities; hydropower; and wind energy
4 development. We have prepared feasibility studies for wind energy facility siting
5 for the Lamoille Economic Development Corporation. We have provided peer
6 review for a wind energy siting manual developed by the Clean Energy States
7 Alliance (CESA). We have presented programs on renewable energy siting,
8 community planning and aesthetics before regional and national audiences such
9 as Northern New England Chapter of the American Planning Association
10 (NNECAPA) and as part of the educational program of the Annual Meeting of
11 the American Society of Landscape Architects (ASLA). We have provided
12 testimony before legislative task forces on renewable energy siting - most
13 recently for the Solar Siting Task force here in Vermont, and are currently
14 serving as consultants in wind energy review and standards for the State of
15 Maine Department of Environmental Protection. Also of note is the fact that
16 LandWorks has provided visual assessments for a number of utility scale solar
17 and wind power projects, as well as energy transmission projects now in
18 operation in Vermont, New Hampshire and Maine, and continues to work on
19 these types of projects for a range of clients.

1 Additional detail regarding my own education and experience is contained in
2 my resume, which is provided as Exhibit PSD-DR-1.

3 Q3. Have you testified before the Vermont Public Service Board?

4 A3. Yes, on numerous occasions.

5 Q4. What is the purpose of your testimony?

6 A4. I introduce LandWorks' Aesthetic Assessment and Review of Orderly
7 development for the Chelsea Solar Project, which is provided as Exhibit PSD-DR-
8 2

9 Q5. Please summarize the analysis you performed for the Project.

10 A5. Our analyses is an aesthetic assessment review of the Project's visibility and
11 potential for visual and aesthetic impacts with a focus on 1) vantage points from
12 major federal, state or local roads, 2) relationships to nearby public lands and
13 areas of public interest, 3) tourism destinations with scenic resources, 4) the
14 immediate project environs, adjacent neighborhood and the Rural Conservation
15 District, and 5) areas with high scenic value and/or official designation as a
16 cultural, aesthetic, or recreational facility or resource. We review the project
17 within the parameters of the Quechee Analysis, and address, in particular, the
18 components of the second step of that analysis. In addition, our review of orderly
19 development assesses land use and landscape dynamics within the parameters of

1 the respective municipal and regional plans, as guided by statute. Our analyses
2 include visual and cartographic analysis, field study, and document research and
3 review. More detailed information on our methodology is contained within the
4 report.

5 Q6. Will the Project have an undue adverse impact on the aesthetics and the scenic
6 and natural beauty of the surrounding area?

7 A6 Yes, the Project, as currently proposed, in my view, will result in an undue
8 adverse impact on aesthetics unless the Applicant adopts revised and
9 recommended mitigation recommendations and addresses a number of
10 additional concerns identified in the report. As described in the Conclusion there
11 is a background and history for this site that includes the precedent decision by
12 the Public Utilities Commission on the previous application (Docket 8302). In
13 addition, the report outlines various other concerns including the Project fit with
14 the site itself, its impact to neighbors, the intent and actions of the host
15 community, community standards established by the town, and insufficient
16 mitigation methods. The Project is not in character with the landscape conditions
17 and aesthetic qualities present on the site and in the district.

18 Q6. Will the Project unduly interfere with the orderly development of the region?

1 A7. Yes, as explained in my report, the Project is 1) incompatible with the rural
2 character of its district, 2) is inconsistent with the land use goals as set forth in
3 the Town Plan, 3) does not reflect the existing and desired land use pattern of the
4 area, and 4) has to significantly alter the site to make it more amendable for the
5 proposed development.

6 Q8. Does this conclude your testimony?

7 A8. Yes.