

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Application of MHG Solar LLC for a certificate)
of public good, pursuant to 30 V.S.A. §§ 8010)
and 248, to install and operate a 500 kW group)
net-metered solar electric generation facility) Case No. 20-1261-NMP
located off Richville Road in Manchester,)
Vermont, to be known as the “Richville Road)
Solar Project”)

PREFILED TESTIMONY OF LUCY THAYER

August 11, 2020

Summary: Ms. Thayer’s testimony addresses the concerns about the Project’s aesthetic impact.

1 **Q1. Please state your name, occupation, and business address.**

2 A1. My name is Lucy Thayer. I am a licensed landscape architect for Trudell Consulting
3 Engineers (“TCE”), an engineering, environmental, and consulting firm located at 478 Blair
4 Park Road, in Williston, Vermont.

5
6 **Q2. Have you previously submitted testimony in this proceeding?**

7 A2. Yes, I submitted an Aesthetics Report, Proposed Landscaping Plan, and Affidavit on behalf
8 of applicant MHG Solar LLC (“MHG”) that was included with the application for the
9 Richville Road Solar Project (“Project”) on May 19, 2020.

10
11 **Q3. What is the purpose of your supplemental testimony?**

12 A3. The purpose of my supplemental testimony is to address the concerns regarding the
13 aesthetic impact of the Project raised in the public comments filed in this case by Richard
14 Cody and Cynthia Bush and the comments included in the motions to intervene filed by
15 Mark Slade, Cosmo Penge, and Timothy and Dody Boucher.

16
17 **Q4. The Bouchers commented, “Summer months when leaves are on the trees, [the
18 Project] will be blocked but obviously winter months it will be in full site.” When
19 choosing the plantings for the Landscape Mitigation plan, did you take into
20 consideration the coverage provided by those plantings in the winter months?**

21 A4. Yes, as I stated in my Aesthetic Analysis, the plant selection was purposefully chosen to be
22 “densely branched to help buffer views to the Project throughout the year.” Exhibit
23 MHG-LT-1 at 14 (emphasis added). I specifically chose a mixture of native vegetation types

1 that already exist or likely exist in the surrounding area, including evergreens (arborvitae) and
2 fast-growing densely branched, deciduous shrubs (dogwoods and shrub willows) that have a
3 suckering habit, planted in a multiple rows and with densities and spacing that provide for
4 appropriate coverage along the eastern edge of the Project. In so doing, the Plan creates
5 year-round filtering of the Project even in leaf off conditions.
6

7 **Q5. The Bouchers expressed concerned about the ability of the plantings to “actually**
8 **grow and thrive on that piece of wet land.” Please explain whether you considered**
9 **the Project site’s environmental features when choosing the plantings.**

10 A5. I expect no growth problems with the selected species. In choosing these species I
11 considered the soil types, existing vegetation, moisture, aspect, exposure and other site
12 characteristics to ensure that the selected varieties were appropriate for the site and have a
13 high likelihood of growing and thriving. In providing this answer I also note that the subject
14 parcel is already forested on its western extend and is listed as containing prime agricultural
15 soils. The proposed plantings will be in close proximity to the existing trees along Richville
16 Road which is the subject parcel’s eastern boundary and thus I expect the new plantings will
17 also be able to grow and thrive.
18

19 **Q6. The Bouchers and Ms. Bush questioned what the Project site would look like from**
20 **the date of planting until the landscaping reached full maturity. Please respond to**
21 **their comments, and in particular, explain whether the size and growth rate of the**
22 **proposed trees and shrubs to be installed is appropriate for this site and**
23 **circumstances.**

1 A6. Taller and more mature specimens were not chosen due to the poorer survival rate of larger
2 transplanted trees, and the request of the Town to limit the height of the plantings to
3 preserve the view to Mount Equinox. The species chosen, as stated above, were selected for
4 their ability to grow and thrive in this location as well as to provide maximum coverage
5 throughout the year. The evergreen arborvitae will be installed at six to seven-foot height
6 and will provide year-round buffering of the Project. The dogwood and willow shrubs have
7 a fast growth rate and can have height increases of 24 inches annually. The Plan also meets
8 the requirements set forth in the Manchester Land Use & Development Ordinance Section
9 7.3.5 and the draft Manchester Energy Plan.

10

11 **Q7. In your opinion, does the proposed Landscape Mitigation Plan provide appropriate**
12 **screening from the neighborhood east of Richville Road?**

13 A7. Yes. MHG has taken generally available mitigating steps that a reasonable person would
14 take to improve the harmony of the Project with its surroundings. As discussed in the
15 Aesthetic Analysis Report, the array has been sited as far to the west as site and
16 environmental constraints allow to create distance from public while avoiding natural
17 resources on the site. The proposed Landscape Mitigation Plan, as discussed above, creates
18 an appropriate visual buffer between the Project site and Richville Road, including the
19 residential area to the east of the Project and Richville Road where some of the commenter's
20 live, while also preserving views to Mount Equinox.

21

1 **Q8. Several of the public comments and motions to intervene focused on the Project**
2 **changing the character of the area, pointing specifically to the residential**
3 **neighborhood and the bucolic scenery. In your determination that the Project would**
4 **not create an undue adverse aesthetic impact, did you consider and weigh these**
5 **concerns?**

6 A8. Yes, as described in the Aesthetic Assessment Report, Exhibit MHG-LT-1, Step 1 of the
7 Quechee Analysis requires a review of the nature of a project's surroundings. In my review,
8 I determined that the Project site is located in a Mixed Use 2 zoning district, and in the
9 immediate vicinity of the Project area a variety of structures in the area, including single
10 family residences, accessory structures, mixed-use developments, small businesses (including
11 a drive-thru bank, post office, self-storage facility), municipal facilities, and light
12 manufacturing/warehouse facilities. *Exhibit MHG-LT-1 at 6 - 8.* In my opinion, the
13 Project with its mitigated visibility through the Landscape Mitigation Plan proposed by
14 MHG, will not change the character of the area.

15
16 **Q9. Does that conclude your testimony at this time?**

17 A9. Yes, it does.