

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of VT Real Estate Holdings 1 LLC)
for a Certificate of Public Good, pursuant to)
30 V.S.A. § 248, authorizing the installation)
and operation of a 20 MW solar electric)
generation facility off Holy Smoke Road in)
Shaftsbury, Vermont to be known as the)
“Shaftsbury Solar Project”)

Case No. 23-____-PET

**PREFILED DIRECT TESTIMONY OF BRITTA TONN
ON BEHALF OF VT REAL ESTATE HOLDINGS 1 LLC (“SHAFTSBURY SOLAR”)**

May 3, 2023

Summary: Ms. Tonn’s testimony addresses the proposed Shaftsbury Solar Project’s compliance with the Section 248(b)(5) criterion for historic resources.

EXHIBIT LIST

Exhibit SS-BT-1
Exhibit SS-BT-2

Resume
Historic Resources Assessment

1 **Introduction**

2 **Q1. Please state your name, current employer, business address, and position.**

3 A1. My name is Britta Tonn. I am a Director of Cultural Resources at Vanasse Hangen Brustlin,
4 Inc. (“VHB”). My business address is 40 IDX Drive, Building 100, Suite 200, South
5 Burlington, Vermont.

6

7 **Q2. Please describe your professional background, qualifications, and experience.**

8 A2. I am a Secretary of the Interior (“SOI”)-qualified (36 CFR Part 61) Architectural Historian,
9 meeting the education and experience required to perform identification, evaluation,
10 registration, and treatment activities related to historic properties. I hold an M.S. in Historic
11 Preservation from the University of Vermont (“UVM”), Burlington, VT (2010) and a B.A. in
12 the History of Art and Architecture from Middlebury College, Middlebury, VT (2002). I
13 have worked as an architectural historian and preservation planner in the field of historic
14 preservation since 2010. Over the past twelve years, I have completed historic resources
15 assessments for a variety of projects requiring review under Section 248(b)(5) including solar
16 installations and telecommunications facilities. My resume is attached as ***Exhibit SS-BT-1***.

17

18 **Q3. Have you testified previously before the Public Utility Commission (“Commission”
19 or “PUC”)?**

20 A3. Yes, I have provided prefiled testimony in the following cases: Bromley Solar Project (Case
21 No. 19-2680-NMP), Gaskill Road / VT-VT-0023A (Case No. 21-3127-PET), and AT&T
22 SR# VT-104 (Case No. 20-3260-PET). I have also provided technical support and expertise
23 for solar installations in the form of historic resources assessment reports for the following

1 cases: Outback Acres Solar Project (Case No. 22-2423-AN), Adams Road Solar Project
2 (Case No. 21-4787-PET), and Ethan Allen Solar Project (Case No. 21-1051-PET).

3
4 **Q4. What is the purpose of your testimony?**

5 A4. My testimony addresses Shaftsbury Solar Project’s compliance with the Section 248(b)(5)
6 criterion for historic resources.

7
8 **Q1. Please describe the work you conducted with respect to the Project.**

9 A1. I completed a Historic Resources Assessment to evaluate the effects of the Project on both
10 above-ground and below-ground (archaeological) resources. I followed the Vermont
11 Division for Historic Preservation (“DHP”) guidelines for review under the Section
12 248(b)(5) criterion for historic resources, which rely on Rule 4 (Historic Sites and the Act
13 250 Process) of the Vermont Historic Preservation Rules. I conducted the above-ground
14 assessment for this Project, which included both desktop and field research. The UVM
15 Consulting Archaeology Program (“UVM CAP”) and Crown Consulting Archaeology, LLC
16 (“CCA”) conducted the on-site archaeological assessments in 2018 and 2023, respectively.
17 The Historic Resources Assessment involved a field survey to establish the Area of Potential
18 Effect (“APE”) and identify potential Historic Sites. The written report includes a
19 description and justification of the APE, an evaluation of the potential State Register
20 eligibility of properties within the APE, and an assessment of the project’s effects on historic
21 resources. I summarized the findings of UVM CAP’s and CCA’s archaeological
22 investigations in my Historic Resources Assessment. See *Exhibit SS-BT-2*.

23

1 **Historic Sites (30 V.S.A. § 248(b)(5))**

2 **Q5. Will the Project result in any undue adverse impacts to below-ground historic**
3 **resources located on the Project site?**

4 A5. As described in my report, the UVM CAP and CCA Archaeological Resource Assessments
5 both concluded “no areas of archaeological sensitivity were identified, and no additional
6 archaeological study is recommended.” I included these archaeology assessments in my
7 report as attachments.

8 As a result, there will be no impacts to any on-site archaeological resources as a result
9 of the Project, let alone undue adverse impacts. See *Exhibit SS-BT-2*.

10

11 **Q6. Are there any above-ground historic resources on the site, and if so, will the Project**
12 **cause any undue adverse impacts to such resources?**

13 A6. There are no above-ground historic resources on the Project site. The only building on the
14 Project property is 1004 Holy Smoke Road (constructed in 1996) which is ineligible for
15 listing in the State Register of Historic Places because it is not yet 50 years old. Therefore,
16 the Project will not cause any impacts to such resources, let alone undue adverse impacts.

17 See *Exhibit SS-BT-2*.

18

19 **Q7. Are there any above-ground historic resources located off-site that could be impacted**
20 **by the Project?**

21 A7. As outlined in my report, there are no above-ground historic resources located off-site that
22 could be impacted by the Project. The four buildings located off-site but within the Area of
23 Potential Effect (“APE”) are all less than 50 years old and therefore they are not eligible for
24 listing in the State Register.

1 As a result, the Project will not cause any impacts to off-site historic sites, let alone
2 undue adverse impacts. See *Exhibit SS-BT-2*.

3

4 **Q8. Does this conclude your testimony at this time?**

5 A8. Yes.