STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Reservoir Road Solar, LLC, for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, to construct, own, and operate a 2.375 MW ground-mounted solar electric generation facility in Berkshire, Vermont	)	Case No. 24-____-PET

PREFILED TESTIMONY OF STEPHANIE WYMAN

December 4, 2024

Summary: Ms. Wyman's testimony addresses the Project's compliance with Section 248(b)(5) with respect to Waste Disposal, Soil Erosion, Water Quality, and Primary Agricultural Soils.

EXHIBIT LIST

RRS-SW-1:	Resume
RRS-SW-2:	Waste Disposal/Soil Erosion Assessment
RRS-SW-3:	Primary Agricultural Soils Assessment

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

A1. My name is Stephanie Wyman. I am a civil engineer at Vanasse Hangen Brustlin, Inc. ("VHB"), State of Vermont Professional Engineer #134215. My business address is 40 IDX Drive, Building 100, Suite 200, South Burlington, Vermont.

Q2. What is the purpose of your testimony?

A2. My testimony supports the petition of Reservoir Road Solar, LLC for Section 248 approval of a 2.375 MW solar electric generation facility ("Project") to be located off Reservoir Road in Berkshire, Vermont. Specifically, my testimony provides an overview of the Project, describes my work developing the site plan, and addresses the Project's compliance with Section 248(b)(5) with respect to Waste Disposal, Soil Erosion, Water Quality, and Primary Agricultural Soils.

Q3. Please describe your professional background, qualifications, and experience.

A3. I hold a B.S. degree in Environmental Engineering (2011) from the University of Vermont. My education and professional experience include transportation engineering, civil/environmental engineering, and commercial and residential project design. I have over 10 years of experience planning, permitting, and monitoring erosion prevention and sediment control ("EPSC"), and designing, permitting, and inspecting stormwater management systems. A more detailed description of my experience is provided in ***Exhibit RRS-SW-1***.

Q4. Have you previously testified before the Public Utility Commission ("PUC")?

A4. Yes, I have testified before the Vermont Public Utility Commission in the Petition of Shaftsbury Solar, Case No. 23-1447-PET. I have also provided testimony for the following projects currently under review by the PUC, Williston F Mountain View Solar, LLC (Case No. 24-1689-PET), Williston E Chip Alley Solar, LLC (Case No. 24-1024-PET), Essex A North Lot Solar, LLC (Case No. 24-1898-PET), and Mill River Solar, LLC (Case No. 24-0606-PET). In addition, I have provided technical design support and expertise on over twenty projects that were reviewed and approved or are under review by the PUC.

Q5. Please describe the work you conducted with respect to the Project.

A5. My involvement with this Project includes the civil/site engineering design. I prepared the site plans for the Project, which are sponsored by overview witness Sam Carlson (***Exhibit RRS-SC-2***) and reviewed the plans with respect to potential impacts under certain Section 248 criteria. In preparing the site plans VHB staff performed the following tasks and evaluations:

1. Design of the site plans, including: access road grading, drainage, erosion prevention and sediment control measures, stormwater management, fencing, and secondary oil containment design;
2. Review of construction stormwater permitting needs;
3. Review of operational stormwater permitting needs; and
4. Review of presence and proposed measures for protection of primary agricultural soils.

SECTION 248 CRITERIA

Waste Disposal – 10 V.S.A. § 6086(a)(1)(B)

Q6. What are the Project's plans for waste disposal?

A6. VHB has reviewed the Petitioner's plan for disposal of waste under this criterion as it relates to sanitary wastewater, operational stormwater runoff, and general construction waste including tree and brush debris. Although not a "waste", VHB also reviewed the Project's plans for transformers and transformer coolant, including oil containment and applicability of a Spill Prevention Control and Countermeasure ("SPCC") Plan.

The Project as designed will meet applicable regulations or current guidance regarding the disposal of waste and does not involve the injection of waste materials or toxic substances into ground or surface waters. The Project operation will not generate sanitary waste. Because the Project is spanning two Parcels with existing impervious surface totaling over one-acre and the Project is generating a minimal amount of new impervious surface, the Project will require approval under Vermont's operational phase stormwater discharge permit program. The Project will therefore seek and obtain an operational stormwater permit before beginning site preparation or construction. Additional details of VHB's assessment under the Waste Disposal criterion are included in a memorandum attached as ***Exhibit RRS-SW-2***.

As described in ***Exhibit RRS-SW-2***, the Project will generate minor amounts of scrap and waste material during installation, and this waste will be disposed of or recycled at an approved disposal facility in accordance with Vermont Solid Waste Management Rules. The Project is not anticipated to generate any waste during operation.

Woody debris generated by any shrub and tree clearing will be either offered to the landowners for use as firewood, or will be chipped, piled, or transported off site.

The 2,500 kVA pad-mounted transformer will contain organic FR3 oil and will be housed within a secondary oil containment system, sized to contain 110 percent of the largest anticipated volume of a potential release of transformer dielectric fluid, plus a 5-inch rainwater event. See containment detail, ***Exhibit RRS-SC-2.*** Based on the volume of oil contained in the transformer (500 gallons), SPCC regulations do not apply and the Project will not require a SPCC Plan.

Q7. Have you evaluated the Project's potential for impacts on groundwater source protection areas?

A7. Yes. There are two mapped groundwater source protection areas ("SPAs") to the south of the Project site, which are shown on the Site Plan (***Exhibit RRS-SC-2***). The fenced Project area has been designed to avoid the SPAs and is not within 200 feet of either wellhead. However, some minimal construction and improvements will occur within the SPA areas. First, the existing access road is within 200 feet of one of the wellheads. The Project will need to temporarily widen and upgrade portions of this road for construction of the Project and will replace the existing culvert crossing at Trout Brook with one aluminum box culvert which spans the bankfull width of the stream channel. As part of this replacement, the existing road grade in the vicinity of Trout Brook will be raised as necessary to meet appropriate design criteria. Within the second SPA buffer to the south-east of the Project, minimal off-grading from the temporary turn-around area for construction vehicles will occur. No delivery vehicles or construction equipment, other

than those being utilized for grading, will encroach into the area. The Petitioner has coordinated with ANR regarding these SPAs and the Project design, and agrees to implement the Best Management Practices ("BMPs") outlined in ***Exhibit RRS-SW-2*** for work occurring within the SPAs. These BMPs will help ensure that the construction work that takes place within the SPAs is controlled and closely monitored and avoid any undue adverse impacts.

With respect to Project infrastructure, the Project's transformer will be located approximately 140 feet away from an SPA at the closest point, and as described above will have a secondary containment system in the unlikely event of an oil leak. The transformer is not located within wetlands, wetland buffers, streams, or stream buffers. The distance from sensitive receptors and proposed secondary containment structures will prevent the unlikely release of oil to waters of the U.S. or other sensitive receptors. For these reasons, the Project will not result in undue adverse impacts to the SPAs. ***See also Exhibit RRS-SW-2.***

Soil Erosion – 10 V.S.A. § 6086(a)(4)

Q8. Will the Project cause unreasonable soil erosion or a reduction in the capacity of the land to hold water so that a dangerous or unhealthy condition may result?

A8. No. Because the Project will involve more than one acre of earth disturbance, it will require authorization by the Department of Environmental Conservation under Construction General Permit 3-9020. The permit will require implementation of Erosion Prevention and Sediment Control ("EPSC") BMPs to control erosion and discharge of

sediment from the construction site through a site-specific EPSC Plan as determined by the Project's risk category.

Additionally, as noted above, because the Project is spanning two Parcels with existing impervious surface totaling over one-acre and the Project is generating a minimal amount of new impervious surface, the Project will also require approval under Vermont's operational phase stormwater discharge permit program. The Project design includes simple disconnection stormwater treatment practices along the turnaround area at the entrance of the Project site that will treat stormwater runoff from new impervious surfaces. See ***Exhibit RRS-SC-2*** (Site Plan) and ***Exhibit RRS-SW-2*** for more details. With these measures, the Project will not result in unreasonable soil erosion or a reduction in the capacity of the land to hold water so that a dangerous or unhealthy condition may result.

Water Purity – 30 V.S.A. § 248(b)(5)

Q9. Will the Project result in an undue adverse impact on water purity?

A9. No. As described above, I have assessed the waste disposal and soil erosion factors under Section 248(b)(5), including the Project's potential for adverse impacts on sensitive receptors, and concluded that the Project will not cause an undue adverse impact on water quality or the environment due to those factors.

Primary Agricultural Soils – 10 V.S.A. § 6086(a)(9)(B)

Q10. Will the Project result in undue adverse impacts to Primary Agricultural Soils, as defined by 10 V.S.A. § 6001(15)?

A10. No. As explained in more detail in ***Exhibit RRS-SW-3*****,** the Project will involve direct impacts to Primary Agricultural Soils ("PAS") as mapped by the NRCS and per the definition in 10 V.S.A § 6001(15). As proposed, the Project will have approximately 5.6 acres of direct permanent impacts (during the life of the project) and 1.1 acres of temporary direct impacts, for a total of 6.7 acres of direct impacts. Additionally, the Project may have up to 7.8 acres of indirect impacts – for a total of 14.5 acres of potential impacts to PAS within the limits of work.

The Project proposes to mitigate temporary disturbance from trenching by temporarily stockpiling PAS on site and within the same NRCS soil map unit per horizon, and then replacing soil at the end of construction in the reverse order of excavation. The Project further proposes to stockpile soils excavated for permanent (Project-lifespan) impacts by stockpiling soil segregated per horizon. The stockpile would be stabilized and vegetated and located within the Project perimeter fence. See ***Exhibit RRS-SC-2***. Upon Project decommissioning, the Project will be returned to its current condition to the degree reasonably possible and stockpiled soils would be replaced in the reverse order of excavation within each soil map unit. In addition, if deemed necessary by the Agency of Agriculture, Food & Markets ("AAFM") the Project would mitigate for any compaction which may result during construction or decommissioning, which would potentially include soil bulk density testing prior to construction and again at the end of decommissioning.

Q11. Does that conclude your testimony at this time?

A11. Yes, it does.