

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of ER Dunsmore, LLC for a
Certificate of Public Good pursuant to 30
V.S.A. § 248, authorizing the installation
and operation of a 4.95 MW solar electric
generation facility off Dunsmore Road in
the Town of St. Albans, Vermont

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Case No. 25-____-PET

PREFILED DIRECT TESTIMONY OF STEPHANIE WYMAN

May 5, 2025

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

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

Introduction

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

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 your education background, qualifications, and work experience?

A2. 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 DRS-SW-1*.

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

A3. 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 that were recently reviewed and approved or are 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), Mill River Solar, LLC (Case No. 24-0606-PET), and Reservoir Road Solar,

1 LLC (Case No. 24-3571-PET). In addition, I have provided technical design support and
2 expertise on over twenty projects that were reviewed and approved or are under review
3 by the PUC.
4

5 **Q4. What is the purpose of your testimony?**

6 A4. My testimony supports the petition of ER Dunsmore, LLC for Section 248 approval of a
7 4.95 MW solar electric generation facility (“Project”) to be located off Dunsmore Road in
8 St. Albans Vermont. Specifically, my testimony provides an overview of the Project,
9 describes my work developing the site plan, and addresses the Project’s compliance with
10 Section 248(b)(5) with respect to Waste Disposal, Soil Erosion, Water Quality, and
11 Primary Agricultural Soils.
12

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

14 A5. My involvement with this Project includes the civil/site engineering design. I prepared
15 the site plans for the Project, which are sponsored by overview witness Taegen Kopfler
16 (*Exhibit DRS-TK-2*) and reviewed the plans with respect to potential impacts under
17 certain Section 248 criteria. In preparing the site plans VHB staff performed the
18 following tasks and evaluations:

- 19 a. Design of the site plans, including: access road grading, drainage, erosion
20 prevention and sediment control measures, stormwater management, fencing, and
21 secondary oil containment design;
22 b. Review of construction stormwater permitting needs;

- 1 c. Review of operational stormwater permitting needs; and
2 d. Review of presence and proposed measures for protection of primary agricultural
3 soils.
4

5 **SECTION 248 CRITERIA**

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

7 **Q6. What are the Project’s plans for waste disposal?**

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

13 The Project as designed will meet applicable regulations or current guidance
14 regarding the disposal of waste and does not involve the injection of waste materials or
15 toxic substances into ground or surface waters. The Project operation will not generate
16 sanitary waste. The Project parcel currently has 0.43 acres of existing impervious
17 surfaces. The Project will generate less than an acre of new impervious surface, and
18 redevelop and remove some existing impervious surfaces. The total impervious surface
19 on the parcel after the Project is constructed will total 1.08 acres. As such, the Project
20 will require approval under Vermont’s operational phase stormwater discharge permit
21 program, which Petitioner will obtain before beginning site preparation or construction.
22 Additional details of VHB’s assessment under the Waste Disposal criterion are included
23 in a memorandum attached as *Exhibit DRS-SW-2*.

1 As described in *Exhibit DRS-SW-2*, the Project will generate minor amounts of
2 scrap and waste material during installation, and this waste will be disposed of or
3 recycled at an approved disposal facility in accordance with Vermont Solid Waste
4 Management Rules. The Project is not anticipated to generate any waste during operation.
5 Woody debris generated by any shrub and tree clearing will be sold for lumber if
6 merchantable, offered as firewood to nearby landowners, or chipped and hauled to an
7 approved disposal site.

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

14
15 **Q7. Have you evaluated the Project’s potential for impacts on groundwater source**
16 **protection areas?**

17 A7. Yes. There are no mapped groundwater source protection areas or surface water source
18 protection areas (“SPAs”) within the vicinity of the Project site. Mapped private water
19 supply wells in the vicinity of the Project area are located greater than 1,000 feet from the
20 transformers and are reported to be bedrock wells, as further discussed in *Exhibit DRS-*
21 *SW-2*. The distance from sensitive receptors and proposed secondary containment

1 structures will prevent the unlikely release of oil to waters of the U.S. or other sensitive
2 receptors. *See also Exhibit DRS-SW-2.*

3
4 **Soil Erosion – 10 V.S.A. § 6086(a)(4)**

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

7 A8. No. Because the Project will involve more than one acre of earth disturbance, it will
8 require authorization by the Department of Environmental Conservation under
9 Construction General Permit 3-9020. The permit will require implementation of Erosion
10 Prevention and Sediment Control (“EPSC”) BMPs to control erosion and discharge of
11 sediment from the construction site through a site-specific EPSC Plan as determined by
12 the Project’s risk category.

13 Additionally, as noted above, the Project will also require approval under
14 Vermont’s operational phase stormwater discharge permit program. The Project design
15 includes infrastructure to treat stormwater on site, including gravel wetland and simple
16 disconnection stormwater treatment practices. See *Exhibit DRS-TK-2* (Site Plan) and
17 *Exhibit DRS-SW-2* for more details. With these measures, the Project will not result in
18 unreasonable soil erosion or a reduction in the capacity of the land to hold water such
19 that a dangerous or unhealthy condition may result.

20

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 DRS-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 2.1 acres of direct permanent impacts (during the life of the project) and 2.6 acres of temporary direct impacts, for a total of 4.7 acres of direct impacts. Additionally, the Project may have up to 33.0 acres of indirect impacts – for a total of 37.7 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 use the soil excavated for permanent (Project-lifespan) impacts as fill for the access road improvements to alleviate the need for foreign structural fill to be brought in. Any remaining excavated soil will be

1 stockpiled and segregated per horizon. The stockpile would be stabilized and vegetated
2 and located within the Project perimeter fence. See ***Exhibit DRS-TK-2***. Upon Project
3 decommissioning, the Project site will be returned to its current condition to the degree
4 reasonably possible and stockpiled soils would be replaced in the reverse order of
5 excavation within each soil map unit. In addition, if deemed necessary by the Agency of
6 Agriculture, Food & Markets (“AAFM”) the Project would mitigate for any compaction
7 which may result during construction or decommissioning, which would potentially
8 include soil bulk density testing prior to construction and again at the end of
9 decommissioning.

10
11 **Q11. Does that conclude your testimony at this time?**

12 A11. Yes, it does.

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