

**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	)	Case No. 25-0895-PET
and operation of a 4.95 MW solar electric	)	
generation facility off Dunsmore Road in	)	
the Town of St. Albans, Vermont	)	

**SUPPLEMENTAL TESTIMONY OF ADAM CRARY
ON BEHALF OF ER DUNSMORE, LLC**

August 15, 2025

Summary of Testimony

Mr. Crary addresses updates to the status of the grassland bird habitat that was identified as necessary wildlife habitat on the site.

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

2 A1. My name is Adam Crary, employed at Vanasse Hangen Brustlin, Inc. (“VHB”), and my
3 business address is 20 Winooski Falls Way, Suite 400 Winooski VT 05406. I am
4 currently the Renewable Energy Regulatory Team Leader for VHB in Vermont.

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

6 A2. Yes, I previously provided direct prefiled testimony and exhibits dated May 5, 2025.

7 **Q3. What is the purpose of your testimony?**

8 A3. I provide an update regarding the status of the portion of the Project site that was
9 previously determined by VHB to qualify as potential grassland bird habitat (“GBH”) and
10 was assumed to be necessary wildlife habitat under criterion 8(A). Because site
11 conditions have changed, this area no longer qualifies as potential GBH.

12 **Q4. Please describe the changes to the conditions of the area previously identified as**
13 **potential GBH.**

14 A4. Since VHB conducted the natural resources assessment of the Project site between 2017
15 and 2023, the tenant farmer that farms the Project area has since planted corn in the
16 approximately 2.5 acres of the site that was formerly hayfield and identified as potential
17 grassland bird habitat in the Natural Resource Memo (*Exhibit DRS-AC-2*). Because the
18 area no longer contains hayfield cover, it will not attract grassland birds looking to build
19 nests during the breeding season. As a result of this non-Project related activity, the
20 conditions of this area no longer provide suitable grassland habitat, and the Project will
21 not occur within any potential grassland bird habitat. This finding was reviewed with the

1 Fish & Wildlife Department (N. Dodge) as well. Therefore, mitigation payments to offset
2 potential impacts from the Project within this 2.5-acre area are no longer required, as I
3 had originally testified would be required.
4

5 **Q5. Does this update change any of your prior conclusions regarding the Project's**
6 **compliance with the environmental criteria in Section 248(b)? If so, how?**

7 A5. No. The change in crop conditions of the former hayfield means that the Project will
8 have no assumed impact on necessary wildlife habitat because suitable grassland bird
9 habitat is no longer present. As a result, my conclusions that the Project will not have an
10 undue adverse impact on natural resources or any of the environmental sub criteria in
11 Section 248(b)(5) has not changed.

12 **Q6. Does this conclude your testimony?**

13 A6. Yes.