

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Williston G Katie Lane Solar, LLC's
Petition for a Certificate of Public Good in
accordance with 30 V.S.A. § 248 regarding
a proposed 2.9 MW ground-mounted solar
array located off Mountain View Road in
Williston, Vermont.

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) Case No. 25-____-PET
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**PREFILED TESTIMONY AND DECLARATION OF STEPHANIE WYMAN
ON BEHALF OF WILLISTON G KATIE LANE SOLAR, LLC**

This document has been filed via ePUC

Summary: Ms. Wyman's testimony addresses the Project's compliance with Section 248(b)(5) with respect to Waste Disposal, Soil Erosion, and Primary Agricultural Soils. Ms. Wyman's Testimony also summarizes and addresses certain comments Petitioner received in response to its 45-Day Notice

EXHIBIT LIST

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

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

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

6 **Q2. What is the purpose of your testimony?**

7 A2. My testimony supports the application of Williston G Katie Lane Solar for Section 248
8 approval of a 2.9 MW solar electric generation facility ("Project") to be located off of
9 Mountain View Road in Williston, Vermont.

10 Specifically, my testimony describes my work developing the site plan and
11 addresses the Project's compliance with Section 248(b)(5) with respect to Waste
12 Disposal, Soil Erosion, and Primary Agricultural Soils.

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

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

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

1 A4. Yes. I have provided prefiled testimony to the PUC previously. Recently, I testified in
2 Case No. 24-1024-PET, which resulted in the issuance of a Certificate of Public Good to
3 Williston E Chip Alley Solar, LLC for a ground-mounted solar array portion of the same
4 440-acre parcel where the Petitioner in this case seeks to construct and operate a similar
5 solar array. I have also recently testified in Case No. 24-1898-PET, which resulted in the
6 issuance of a Certificate of Public Good to Essex A North Lot Solar, LLC, for
7 construction and operation of a ground-mounted solar array. Additionally, I have
8 provided technical design support and expertise on over twenty projects that were
9 reviewed and approved or are under review by the PUC.

10
11 **Q5. Please describe the work you conducted with respect to the Project.**

12 A5. My involvement with this Project includes the civil/site engineering design. I prepared
13 the site plans for the Project, which is sponsored by Project Manager Jake Clark (***Exhibit***
14 ***WGKL-JC-2***) and reviewed the plans with respect to potential impacts under certain
15 Section 248 criteria. In preparing the site plans I, and others working with me, have
16 performed the following tasks and evaluations:

- 17 • Design of the site plans, including access road grading, drainage, erosion
18 prevention and sediment control measures, fencing, and secondary oil
19 containment design;
- 20 • Construction phase and operational phase stormwater permitting needs; and
- 21 • Presence and protection of primary agricultural soils.

22 In undertaking the tasks above, I have relied on information about the Project provided
23 by Petitioner and the professionals working with Petitioner to develop the Project,

1 including Project Manager, Jake Clark. For a complete Project description, please refer to
2 the prefiled testimony of Mr. Clark and *Exhibit WGKL-JC-2*.

3
4 **SECTION 248 CRITERIA**

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

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

7 A6. VHB has reviewed the Petitioner’s plan for disposal of wastes under this criterion as it
8 relates to sanitary wastewater, operational stormwater runoff, general construction waste
9 including tree and brush debris, and potential historical site contamination. Although not
10 a “waste”, VHB also reviewed the Project’s plans for transformers and transformer
11 coolant, including oil containment and applicability of a Spill Prevention Control and
12 Countermeasure (“SPCC”) Plan. As detailed further in *Exhibit WGKL-SW-2* the Project
13 on its own does not require an SPCC Plan. Global Foundries maintains an SPCC Plan
14 covering oil storage at its facilities. If it were determined that Project-related oil-filled
15 equipment were subject to regulation under the Global Foundries Plan, Petitioner will
16 work with Global Foundries to update that Plan accordingly.

17 The Project as designed will meet applicable regulations or current guidance
18 regarding the disposal of waste and does not involve the injection of waste materials or
19 toxic substances into ground or surface waters. The Project operation will not generate
20 sanitary waste. The majority of the GlobalFoundries campus has coverage under a
21 National Pollutant Discharge Elimination System (NPDES) Permit 3-1295; however, the
22 portion of the parcel where the Project is located is not currently included within the
23 permitted area. Therefore, a Vermont General Permit 3-9050 will be required to treat

1 stormwater runoff from the new impervious surfaces. Details of VHB's assessment under
2 the Waste Disposal §6086(a)(1)(B) criterion is included in a memorandum attached as
3 ***Exhibit WGKL-SW-2***.

4 As described in ***Exhibit WGKL-SW-2***, the Project will generate minor amounts of
5 scrap and waste material during installation, and this waste will be disposed of or
6 recycled at an approved disposal facility in accordance with Vermont Solid Waste
7 Management Rules and applicable regulations. The Project is not anticipated to generate
8 any waste during operation. Woody debris generated by any shrub and tree clearing or
9 trimming will be either offered to the landowners for use as firewood, or will be chipped,
10 piled, or transported off site.

11 The two 1,400 and 1,600 kVA pad-mounted transformers will be housed within
12 secondary oil containment, sized to contain 110 percent of their total volume of
13 transformer dielectric fluid, plus a 5-inch rainwater event. See containment detail,
14 ***Exhibit WGKL-JC-2***. Based on the volume of oil contained in the transformers, SPCC
15 regulations do not apply. The transformer considerations are described in more detail in
16 ***Exhibit WGKL-SW-2***.

17
18 **Soil Erosion – 10 V.S.A. § 6086(a)(4)**

19 **Q7. Will the Project cause unreasonable soil erosion or a reduction in the capacity of the**
20 **land to hold water so that a dangerous or unhealthy condition may result?**

21 A7. No. Because the Project will involve more than one acre of earth disturbance, it will
22 require authorization by the Department of Environmental Conservation under
23 Construction General Permit 3-9020. The permit will require implementation of Best

1 Management Practices (“BMPs”) to control erosion and discharge of sediment from the
2 construction site through a site-specific Erosion Prevention and Sediment Control Plan as
3 determined by the Project’s risk category. Because of the amount of existing and
4 proposed impervious surfaces, which total more than the 1-acre threshold, the Project will
5 be required to treat all new impervious areas. The Petitioner will obtain coverage for that
6 impervious area under Vermont General Permit 3-9050. See *Exhibit WGKL-SW-2* for
7 more details.

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

9 **Q8. Will the Project result in undue adverse impacts to Primary Agricultural Soils, as**
10 **defined by 10 V.S.A. § 6001(15)?**

11 A8. No. As explained in more detail in *Exhibit WGKL-SW-3*, the Project will involve direct
12 impacts to Primary Agricultural Soils (“PAS”) as mapped by the NRCS and per the
13 definition in §6001(15). As proposed, the Project will have approximately 1.5 acres of
14 direct operational phase impacts and 0.3 acres of temporary direct impacts for a total of
15 1.8 acres of direct impacts. Additionally, the Project may have up to 11.7 acres of
16 indirect impacts for a total of 13.5 acres of potential impacts to PAS within the limits of
17 disturbance.

18 The Project proposes to mitigate temporary disturbance from trenching by
19 temporarily stockpiling PAS on site and within the same NRCS soil map unit per
20 horizon, and then replacing soil at the end of construction in the reverse order of
21 excavation. The Project further proposes to stockpile soils excavated for operational-
22 phase (Project-lifespan) impacts by stockpiling soil segregated per horizon. The
23 stockpile will be stabilized and vegetated and located within the Project perimeter fence.

1 See ***Exhibit WGKL-JC-2***. Upon Project decommissioning, soil will be replaced in the
2 reverse order of excavation within each soil map unit. In addition, if deemed necessary
3 by the Agency of Agriculture, Food & Markets (“AAFM”) the Project will mitigate for
4 any compaction which may result during construction or decommissioning, which would
5 potentially include soil bulk density testing prior to construction and again at the end of
6 decommissioning. If bulk density testing performed at the end of decommissioning
7 reveals material soil compaction (*i.e.*, ten percent or higher increase in bulk density), then
8 the Project may be required to perform agricultural subsoiling and/or other strategies to
9 remediate compaction until soil bulk density testing reveals that density is materially the
10 same as it was prior to construction.

11 **Q9. Have you reviewed the February 4, 2025 comments of the Agency of Agriculture**
12 **Food and Markets (AAFM) and March 5, 2025 comments of the Chittenden County**
13 **Regional Planning Commission in response to the Project’s Advanced Notice?**

14 A9. Yes.
15

16 **Q10. What is your response to those?**

17 A10. The February 4, 2025 AAFM comments (see ***Exhibit WGKL-JC-4***) largely restate the
18 requirements of Section 248 relative to primary agricultural soils and/or the requirements
19 of Rule 5.400 regarding the contents of the Petition filing. Petitioner has addressed those
20 filing requirements in ***Exhibits-WGKL-JC-2, and WGKL-SW-3***. In addition, the
21 comments propose several CPG conditions, most of which are also addressed either in
22 my testimony or in ***Exhibit WGKL-SW-3*** and/or will be the subject of negotiation
23 between Petitioner and AAFM during the Section 248 proceeding. Comment number 4

1 states the Project shall not include any grading of PAS, unless required to manage
2 stormwater associated with construction of the access road. Grading will also be required
3 for the construction and installation of the transformer pads and secondary oil
4 containment.

5
6 **Q11. Does this conclude your testimony at this time?**

7 A11. Yes.

WITNESS DECLARATION

I, Stephanie Wyman, being over 18 years of age, and competent to testify on these matters declare that on behalf of Petitioner, I prepared my prefiled testimony and exhibits in the above captioned matter and I have the necessary expertise to testify to the same information. I declare that my testimony and exhibits are true and accurate to the best of my knowledge and belief. I understand that if such responses are false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at South Burlington, Vermont, this 30th day of September 2025.

/s/ Stephanie Wyman

Stephanie Wyman