

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-____-PET

Petition of Williston H Solar, LLC for a
certificate of public good pursuant to 30
V.S.A. § 248 for a 2.75 MW ground-
mounted solar array located off Redmond
Road in Williston, Vermont.

**PREFILED TESTIMONY AND DECLARATION OF
STEPHANIE WYMAN
ON BEHALF OF
WILLISTON H SOLAR, LLC**
This has been filed EPUC

Summary of Testimony

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.

EXHIBIT LIST

WHS-SW-1: Resume

WHS-SW-2: Waste Disposal/Soil Erosion Assessment

WHS-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 20
4 Winooski Falls Way, Suite 400B, Winooski, Vermont.

5
6 Q2. What is the purpose of your testimony?

7 A2. My testimony supports the application of Williston H Solar for Section 248 approval of a
8 2.75 MW solar electric generation facility (Project) to be located off Redmond Road
9 northeast of Chip Aly in Williston, Vermont.

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

13
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 Vermont.
16 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 Exhibit
21 WHS-SW-1.

22
23 Q4. Have you previously testified before the Public Utility Commission (Commission)?

1 A4. Yes. I have provided prefiled testimony to the Commission previously. Recently, I testified
2 in Case No. 24-1024-PET, which resulted in the issuance of a Certificate of Public Good
3 to 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 construction
7 and operation of a ground-mounted solar array. Additionally, I have provided technical
8 design support and expertise on over twenty projects that were reviewed and approved or
9 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 the
13 site plans for the Project, which is sponsored by Petitioner's Project Manager Jake Clark
14 (Exhibit WHS-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 containment design;
19 Construction and Operational phase stormwater permitting needs; and
20 Presence and protection of primary agricultural soils.

21 In undertaking the tasks above, I have relied on information about the
22 Project provided by Petitioner and the professionals working with Petitioner to
23 develop the Project, including Project Manager, Jake Clark. For a complete

1 Project description, please refer to the prefiled testimony of Mr. Clark and Exhibit
2 WHS-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 and potential historical site contamination. VHB also reviewed the Project's plans for
10 transformer and transformer coolant, including oil containment and applicability of a Spill
11 Prevention Control and Countermeasure (SPCC) Plan. As detailed further in Exhibit WHS-
12 SW-2, the Project on its own does not require an SPCC Plan. GlobalFoundries maintains
13 an SPCC Plan covering oil storage at its facilities. If it were determined that Project-related
14 oil-filled equipment were subject to regulation under the GlobalFoundries Plan, Petitioner
15 will work with GlobalFoundries to update that Plan accordingly.

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

1 assessment under the Waste Disposal § 6086(a)(1)(B) criterion are included in a
2 memorandum attached as Exhibit WHS-SW-2.

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

9 The pad-mounted transformer will be housed within secondary oil containment,
10 sized to contain 110 percent of their total volume of transformer dielectric fluid, plus a 5-
11 inch rainwater event. See containment detail, Exhibit WHS-JC-2. The transformer
12 considerations are described in more detail in Exhibit WHS-SW-2.

13
14 **Soil Erosion – 10 V.S.A. § 6086(a)(4)**

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

17 A7. No. Because the Project will involve more than one acre of earth disturbance, it will
18 require authorization by the Department of Environmental Conservation under
19 Construction General Permit 3-9020. The permit will require implementation of Best
20 Management Practices (“BMPs”) to control erosion and discharge of sediment from the
21 construction site through a site-specific Erosion Prevention and Sediment Control Plan.
22 The majority of the GlobalFoundries site has coverage under a National Pollutant
23 Discharge Elimination System (NPDES) Permit 3-1295; however, the location the

1 Project as proposed is not within the coverage area. The Project will be required to treat
2 all new impervious areas. The Petitioner will obtain coverage for that impervious area
3 under Vermont General Permit 4-9050. See Exhibit WHS-SW-2 for more details.

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

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

7 A8. No. As explained in more detail in Exhibit WHS-SW-3, the Project will be constructed in
8 an area mapped as Primary Agricultural Soils (PAS) by the NRCS and per the definition
9 in § 6001(15). As proposed, the Project will have approximately 2.3-acres of direction
10 operational phase impacts and 0.2-acres of temporary direct impacts for a total of 2.5-acres
11 of direct impacts. Additionally, the Project may have up to 7.6-acres of indirect impacts
12 for a total of 10.1-acres of potential impacts to PAS within the limits of disturbance.

13 The Project proposes to mitigate temporary disturbance from trenching by
14 temporarily stockpiling PAS on-site and within the same NRCS soil map unit per horizon
15 and then replacing soil at the end of construction in the reverse order of excavation. The
16 Project further proposes stockpiling soils excavated for operational-phase (Project-
17 lifespan) impacts by stockpiling soil segregated per horizon. The stockpiles will be
18 stabilized and vegetated. See Exhibit WHS-JC-2. Upon Project decommissioning, soil
19 will be replaced in the reverse order of excavation within each soil map unit. In addition,
20 if deemed necessary by the Agency of Agriculture, Food & Markets (“AAFM”) the
21 Project will mitigate for any compaction which may result during construction or
22 decommissioning, which would potentially include soil bulk density testing prior to
23 construction and again at the end of decommissioning. If soil bulk density testing

1 performed at the end of decommissioning reveals material soil compaction (i.e., ten
2 percent or higher increase in bulk density), then the Project may be required to perform
3 agricultural subsoiling and/or other strategies to remediate compaction until soil bulk
4 density testing reveals that density is materially the same as it was prior to construction.
5

6 Q9. Have you reviewed the February 4, 2025 comments of the Agency of Agricultural Food
7 and Markets (AAFM)?

8 A9. Yes.
9

10 Q10. What is your response to those?

11 A10. The February 4, 2025 AAFM comments (see Exhibits WHS-JC-4) largely restate
12 requirements of Commission Section 248 precedent relative to primary agricultural soils
13 and/or the requirements of Rule 5.400 regarding the contents of the Petition filing.
14 Petitioner has addressed those filing requirements in Exhibits-WHS-JC-2, and WHS-SW-
15 3. In addition, the comments propose several CPG conditions, most of which are also
16 addressed either in my testimony or in Exhibit WHS-SW-3 and/or will be subject to
17 negotiation between Petitioner and AAFM during the Section 248 proceeding. Comment
18 number 4 states the Project shall not include any grading of PAS, unless required to
19 manage stormwater associated with construction of the access road. Grading will also be
20 required for the construction and installation of the transformer pad and secondary oil
21 containment.
22

1 Q11. Does that conclude your testimony at this time?

2 A11. Yes, it does.

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 the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Burlington, Vermont, this 4th day of November, 2025.

/s/ Stephanie Wyman

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