

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of Novus 242 Solar LLC for a )  
Certificate of Public Good, pursuant to 30 )  
V.S.A. § 248, authorizing the installation and )  
operation for a 3.75 MW ground-mounted ) Case No. 26-\_\_\_\_-PET  
solar array in Jay, Vermont to be known as the )  
“Novus 242 Solar Project” )

**PREFILED TESTIMONY OF SETH GODDARD**

February 6, 2026

**Summary:** Mr. Goddard addresses the Project’s compliance with certain Section 248 criteria including: air and water purity, waste disposal, soil erosion, sound, and primary agricultural soils.

**EXHIBIT LIST**

***N2S-SG-1:*** Resume of Seth Goddard  
***N2S-SG-2:*** Sound Study

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

2 A1. My name is Seth Goddard. I am Vice President of Krebs and Lansing Consulting  
3 Engineers, Inc. (“K&L”), State of Vermont Professional Engineer #55582. My business  
4 address is 164 Main Street, Suite 201, Colchester, VT 05446.

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

7 A2. My testimony supports the application of Novus 242 Solar LLC (“Novus 242 Solar” or  
8 “Petitioner”) for a Certificate of Public Good to construct and operate a 3.75 megawatt  
9 solar electric generation project (“Project”) located off Vermont Route 242 in Jay,  
10 Vermont. Specifically, my testimony addresses the Project’s compatibility with a number  
11 of criteria applied by the Vermont Public Utility Commission under Section 248, including  
12 air and water purity, waste disposal, soil erosion, sound, and primary agricultural soils.

13  
14 **Q3. Please describe your professional background, qualifications, and experience.**

15 A3. After receiving my BS in Civil Engineering from the University of Vermont in 2005, I  
16 joined Krebs and Lansing Consulting Engineers, Inc. where I have worked as an engineer.  
17 In 2014, I became an owner of the firm. In my present position, I continue to perform  
18 extensive work in civil engineering design, permitting and construction services for  
19 commercial, industrial, institutional, and residential construction projects. I have  
20 performed civil site design and related work for utility projects and several other

1 photovoltaic electric generation systems located in Vermont. A more detailed description  
2 of my experience is provided in *Exhibit N2S-SG-1*.

3 **Q4. Have you previously testified before the Public Utility Commission?**

4 A4. Yes, I have provided prefiled testimony on behalf of a number of solar facility projects.

5  
6 **Q5. Please describe the work you have done for this Project.**

7 A5. My review of this Project involved the civil/site engineering design. I have performed the  
8 following tasks and evaluations:

- 9 1. Survey of site features.
- 10 2. Design of the site plans, which included: shading analysis, array layout, access  
11 road, erosion prevention and sediment control measures, and fencing.
- 12 3. Review of operational and construction stormwater permitting needs.
- 13 4. Study of Project-related sound impacts during operation.
- 14 5. Review of primary agricultural soil mapping.

15 **SECTION 248 CRITERIA**

16 **Air Pollution – 10 V.S.A. § 6086(a)(1)**

17  
18 **Q6. Will the Project cause undue air pollution?**

19 A6. No. Construction of the Project will result in some temporary emissions of minimal levels  
20 of air pollutants from construction vehicles on site, similar to any construction project.  
21 These emissions will be limited to the times that vehicles are on the site and running and  
22 only for the construction period. As this site was previously used as a gravel extraction

1 site, the level of emissions will not be inconsistent with the type of activity on this site  
2 previously. During operation of the Project, there will be no emission of air pollutants  
3 other than from occasional maintenance vehicles (e.g. mowers). These temporary and  
4 infrequent emissions will not result in any undue adverse impact on air pollution.

5  
6 **Q7. Will the Project have an undue adverse effect with respect to sound?**

7 A7. No, it will not. The sound generated by Project construction will be of limited duration,  
8 will largely take place during daytime hours, and will be comparable to the sound  
9 generated by light construction equipment. Construction activities for the Project will be  
10 limited to the hours between 7:00 A.M. and 7:00 P.M., Monday through Friday, and  
11 between 8:00 A.M. and 5:00 P.M. on Saturdays, as needed. Construction will not occur  
12 on state or federal holidays or Sundays unless authorized by the Commission upon  
13 request.

14 With respect to potential noise impacts during operations, the Project components  
15 that will generate sound that may be audible from off-site locations (i.e., beyond the  
16 Project parcel) are the two 2,000 kVA transformers, fifteen (15) CPS inverters and the  
17 motors to power the single axis trackers. The transformers will be located near the center  
18 of the array. The string inverters will be mounted on three (3) equipment racks located  
19 adjacent to the transformers and surrounded by an eight-foot tall fence that is wrapped in  
20 sound attenuation blankets that will reduce the sound levels from this equipment by  
21 approximately 29 decibels. The eight (8) tracker motors are located throughout the array  
22 at the ends of the rows. *See Exhibit N2S-AB-2.*

1           Estimates of the expected sound levels from the Project's inverters and  
2 transformer were developed using the distance damping equation shown on *Exhibit N2S-*  
3 *SG-2*. These estimates are conservative in that I have assumed, for purposes of the  
4 daytime sound estimates, that all of the electrical equipment is operating simultaneously  
5 and continuously at its maximum sound levels. I have also conservatively assumed the  
6 reduction in the estimated sound levels of the inverters from the use of the sound  
7 attenuation blankets to be 14.5 decibels instead of the maximum 29 decibels, which is  
8 half of the estimated reduction impact. Likewise, I have not accounted for any ambient  
9 background noise or the attenuating effect of any vegetation, buildings, or topography  
10 located between the sound source and off-site receptors, in particular proposed vegetation  
11 between the Project and closest residence.

12           Even with these conservative assumptions, the estimated sound levels from the  
13 Project will be low. The estimated daytime and nighttime Project-related sound levels at  
14 the nearest residence are estimated to be approximately 32.5 dBA (daytime), and 18.2  
15 dBA (nighttime). The nighttime sound level was modeled using the transformer only as  
16 the inverters and tracker motors do not operate in the absence of sunshine on the panels  
17 and will therefore not produce any sound. The calculations and supporting information  
18 are provided as *Exhibit N2S-SG-2*.

19           These sound levels are generally low and are in the quiet to very quiet range  
20 compared to everyday noises in the sound chart in the report. It is my understanding that  
21 these sound levels are comparable to other solar projects previously approved by the

1 Commission in that they are below 45 dBA at the nearest residence. Therefore, the  
2 Project will not have an undue adverse effect with respect to sound.

3  
4 **Water Pollution – 10 V.S.A. § 6086(a)(1)**

5 **Q8. Will the Project result in undue water pollution?**

6 A8. No, for the reasons enumerated under the specific water-related sub-criteria below and  
7 those set forth in *Exhibit N2S-DB-2*.

8  
9 **Waste Disposal – 10 V.S.A. § 6086(a)(1)(B)**

10 **Q9. What are the Project's plans for waste disposal?**

11 A9. As there will be no buildings associated with the Project, no on-site wastewater disposal  
12 system is required for the Project and thus a Wastewater System and Potable Water  
13 Supply Permit is not required.

14 Any metal or cardboard generated from the Project construction will be recycled.  
15 All construction waste that cannot be recycled will be disposed of in an approved sanitary  
16 landfill. During operation of the Project, there are no anticipated activities that will  
17 generate waste materials requiring disposal.

18 Project operations will not generate solid wastes, will not involve the injection of  
19 waste materials into groundwater or wells, and will not generate sanitary waste or  
20 stormwater runoff from new impervious surfaces that would require treatment pursuant to  
21 a Vermont Department of Environmental Conservation permit. With respect to  
22 stormwater runoff from Project construction or operation, see my testimony below under  
23 Soil Erosion.

1           Within the limits of disturbance for the Project (approximately 17.39 acres), there  
2 are approximately 0.65 acres of soil disturbance that will result from grading and  
3 earthwork, primarily necessary to construct the access road and equipment pads. The  
4 finish grades are portrayed on the Project Site Plan in *Exhibit N2S-AB-2*. The site will be  
5 graded to the approximate finish grades shown prior to the Project construction by the  
6 landowner as part of the existing Act 250 permit #7R0644 (and subsequent amendments)  
7 reclamation requirements for the gravel pit operation. These reclamation activities would  
8 occur regardless of whether the Project moves forward. There is no overall change to the  
9 drainage pattern within the site.

10           Approximately 0.19 acres of vegetative clearing are proposed. These areas are  
11 inside the perimeter fence and will be stumped and grubbed. Approximately 1.89 acres  
12 of vegetative management is proposed for areas immediately outside of the perimeter  
13 fence, which will involve trees taller than 10 feet cut flush with the existing ground with  
14 all underbrush and stumps remaining. All areas of vegetative clearing and management  
15 are shown on the Project's Site Plan and EPSC Plan (Sheet C-100 and C-103) provided in  
16 *Exhibit N2S-AB-2*. Tree trunks and large limbs will be removed from the site and  
17 utilized for firewood. Smaller debris and limbs will be ground into chips and used in  
18 temporary and final stabilization practices around the site. All stumps that are removed  
19 from the site will be disposed of in an approved stump dump facility. As mentioned  
20 above, stumping is only proposed for clearing areas within the perimeter fence.

21  
22 **Q10. Will the Project meet any applicable health and environmental regulations**  
23 **regarding the disposal of wastes?**

1 A10. Yes, the Project will comply with any applicable health and environmental conservation  
2 department regulations that may apply to the waste disposal activities for the Project  
3 described above.

4

5 **Water Conservation, Sufficiency of Water Supply, and**  
6 **Burden on Existing Water Supply – 10 V.S.A. §§ 6068 (a)(1)(C), (a)(2), (a)(3)**

7 **Q11. Please describe any use of water during construction and operation of the Project.**

8 A11. The Project may use a small amount of water during the construction phase if required  
9 for dust control and for occasional cleaning of panels during the operational phase. In  
10 both instances, any small amount of water needed will be brought to the site. Otherwise,  
11 the Project will not utilize any water supplies (on-site or off-site) during construction or  
12 operations and will not require connection to a well or municipal water supply.

13

14 **Q12. Will the Project result in any undue adverse impact on water conservation or**  
15 **sufficiency, or place an undue burden on any existing water supplies?**

16 A12. No. As described above, the Project will not require the use of any water supply and  
17 therefore will not have any impact on water conservation, sufficiency, or existing supply.

18

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

20 **Q13. Please discuss whether a construction stormwater permit is needed for the Project.**

21 A13. The Project will include potential soil disturbance of approximately 17.39 acres. The  
22 Project will be subject to an Agency of Natural Resources (“ANR”) Moderate Risk  
23 Construction Stormwater General Permit or Individual Construction Stormwater Permit

1 (“INDC”). If the Project elects to concurrently disturb more than five acres, then an  
2 INDC permit will be required. Alternatively, if less than 5 acres of concurrent  
3 disturbance will occur, then a Moderate Risk permit will be required. The Project will be  
4 constructed in accordance with the Vermont Standards & Specifications for Erosion  
5 Prevention and Sediment Control, June 19, 2025. No work shall commence until the  
6 Project receives its Moderate Risk or INDC permit.

7 The majority of the total potential earth disturbance within the limits of  
8 disturbance will be from construction traffic. Specific potential earth disturbances from  
9 installation of Project infrastructure and equipment will include installation of the at  
10 grade access road ( $\pm 12,777$  sf), installation of electrical equipment skid and associated  
11 secondary oil containment ( $\pm 880$  sf), underground trenching of the electrical conduit  
12 ( $\pm 4,000$  sf), construction staging areas, concentrated work areas, fencing, and  
13 miscellaneous other disturbances for construction vehicle travel and post installation. All  
14 areas of construction disturbance, as well as the existing and proposed topography, are  
15 shown on the Project’s Site Plan and EPSC Plan (Sheet C-100 & C-103), ***Exhibit N2S-***  
16 ***AB-2.***

17 Stormwater runoff and erosion control methods that will be used during  
18 construction include: temporary soil stabilization with mulch within 14 days of initial site  
19 disturbance, a temporary stabilized construction entrance, and silt fence downslope of all  
20 proposed disturbances and when work is proposed within 100’ of a downslope wetland.  
21 See Sheets C-103 through C-105 ***Exhibit N2S-AB-2.*** Construction will also be phased so  
22 that no more than five acres of concurrent disturbance will occur if the Project applies for

1 a Moderate Risk Construction Stormwater Permit. No more than 10 acres of concurrent  
2 disturbance shall occur if the Project applies for an INDC permit. These are established  
3 and proven measures accepted by ANR to prevent soil erosion from occurring and  
4 address any potential construction-related stormwater runoff effectively before it reaches  
5 receiving waters. Implementation of these measures will prevent undue soil erosion and  
6 protect water quality.

7  
8 **Q14. Will the Project require an operational stormwater permit?**

9 A14. No. The Project will create approximately 0.31 acres of added impervious surfaces due to  
10 the 12' wide access road and concrete equipment pads for the transformers and  
11 miscellaneous electrical equipment. There are approximately 0.63 acres of existing  
12 impervious surface on the Project parcel. Following construction, there will be 0.94  
13 acres of total impervious surface on the parcel. As there is less than half an acre of new  
14 impervious surface added to the parcel and the total impervious on the parcel post  
15 construction will be less than 1 acre, no operational stormwater permit will be required.

16 ***Exhibit N2S-AB-2.***

17  
18 **Q15. Will the Project cause unreasonable soil erosion or the reduction in the capacity of  
19 the land to hold water so that a dangerous or unhealthy condition may result?**

20 A15. No. The implementation of erosion prevention and sediment control measures outlined  
21 above during construction and consistent with the EPSC Plan and in compliance with the  
22 stormwater permit that the Project will obtain will ensure that sediment is appropriately

1 contained and managed on the site during construction. The Project will be constructed  
2 in accordance with the Vermont Standards & Specifications for Erosion Prevention and  
3 Sediment Control (2025). With these measures, the Project will not cause unreasonable  
4 soil erosion or reduction in the capacity of the land to hold water so that a dangerous or  
5 unhealthy condition could result.

6  
7 **Q16. Will the Project increase stormwater flows to any residence in the Project vicinity?**

8 A16. No. The Project proposes minimal change to the flow of existing stormwater and no  
9 stormwater will be directed towards any of the nearby residences. The soil below the  
10 Project is defined as “well drained to excessively drained” Colton-Duxbury complex so  
11 groundwater from the Project area will be expected to infiltrate back into the soil.

12  
13 **Primary Agricultural Soils – 10 V.S.A. § 6086(a)(9)(B)**

14 **Q17. Will the Project have an undue adverse impact on any Primary Agricultural Soils,**  
15 **as defined by 10 V.S.A. § 6001(15)?**

16 A17. No, the Project will not have an undue adverse impact on primary agricultural soils  
17 (“PAS”). Petitioner reviewed whether there was any mitigation of PAS as part of the Act  
18 250 permit for the extraction operation and did not identify any mitigated soils; rather,  
19 PAS were stockpiled on site to be restored as part of the reclamation process for the pit  
20 operation. As a result, Petitioner is assuming that all mapped PAS soils on the site are  
21 PAS, regardless of the gravel pit operation. There are ±18.60 acres of mapped PAS on  
22 the Project parcel, with ±13.22 acres of mapped PAS within the limits of disturbance

1 (“LOD”) that are potentially subject to disturbance as a result of the Project.

2 Approximately 0.4 acres of PAS will be disturbed to create the access road, install the  
3 equipment pads and conduit trenching. Soils disturbed for trenching will be separated by  
4 their horizons and re-laid in the same order following installation of the buried  
5 lines/conduit. If sand bedding is used, then the PAS shall be removed by horizon and  
6 stored in a PAS stockpile area as shown on the site plan. All other PAS removed during  
7 construction will be stockpiled within the Project fence line and preserved on site in  
8 accordance with the AAFM guidelines for the life of the Project. See proposed stockpile  
9 locations in *Exhibit N2S-AB-2*. At Project decommissioning, these soils will be restored  
10 to the site in accordance with the Vermont AAFM guidelines. As the soils will be  
11 maintained on site and returned at the end of the Project lifetime, there will be no  
12 permanent impacts to PAS soils and no undue adverse impacts to these soils.

13  
14 **Q18. Does that conclude your testimony at this time?**

15 A18. Yes, it does.