STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Northland Solar LLC for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 4.999 MW solar electric generation facility off Route 100 in Lowell, Vermont to be known as the "Northland Solar Project"	Case No. 25-2346

PREFILED TESTIMONY OF JENNIFER BLAY
On behalf of the Town of Lowell

March 27, 2026

Exhibits:
TL-JB-1 Jennifer Blay's Resume
TL-JB-2 Bachelor Degrees and Master Degree in one transcript
TL-JB-3 Agency of Education Additional Endorsement Letter for Principal Endorsement
TL-JB-4 Northeast Regional Development Public Comment Letter by David Snedeker
TL-JB-5 07 2026-01-23 NS Responses to the Town of Lowell's R2 Discovery
TL-JB-6 Doug Mannings video 792
TL-JB-7 Image copy of 775 created by Doug Manning
TL-JB-8 Image copy of 776 created by Doug Manning
TL-JB-9 Screenshot of Natural Resources Map with Northland Solar Overlay
TL-JB-10 NVDA Supplemental Comments_Lowell Solar
TL-JB-11 Northeast Kingdom Genealogy
TL-JB-12 Old Stone House Museum Website
TL-JB-13 Saving Greene Citizens for Sensible Solar
TL-JB-14 2025-12-12 NS Responses to Town of Lowell and other Intervenors
TL-JB-15 Larry Lacross Affidavit
TL-JB-16 Evan Brasseur Affidavit
TL-JB-17 Conserved Land Screenshot

Summary:
Ms. Blay's testimony addresses orderly development under 30 VSA §248(b)(1); aesthetic impact under 30 VSA §248(b)(5) and 10 VSA §6086(a)(8); the natural environment and use of natural resources under 30 VSA §248(b)(5), particularly prime agricultural lands; public health and safety under 30 VSA §248(b)(5); and water quality under 30 VSA §248(b)(5) and 10 VSA §6086(a)(1). Her testimony also addresses the general good of the state.

Prefiled Testimony of Jennifer Blay

Q.1 Please identify yourself by full legal name, occupation, and business address.

A.1 My name is Jennifer Blay. I am the Middle School Science Teacher for the Lowell Graded School located at 52 Gelo Park Road, Lowell, Vermont. I am also the current Selectboard Chair for the Town of Lowell. The address of the Lowell Town Office is 2170 VT. Rte 100, Lowell, Vermont. I am representing the Town of Lowell as an Intervenor in the Northland Solar Case 25-2346-PET.

Q.2 Please describe your educational background and professional qualifications and experience.

A.2 I grew up in Newport, Vermont and graduated from North Country Union High School in Newport, Vermont. I attended Lyndon State College where I received two Bachelor's degrees; Bachelor of Science Majoring in Education with a concentration in Early Childhood Education, and a Bachelor of Arts Majoring in Liberal Studies. While earning my two undergraduate degrees, I earned Endorsements in Middle School Science and Language Arts grades 5-9, as well as a K-12 Reading Disabilities Endorsement to go with my Elementary Education and Early Childhood Education Endorsements. I earned a Master's Degree from Lyndon State College in May of 2014, Majoring in Curriculum and Instruction, and in June 2018 I received a Principal's Endorsement from Castleton University. As a middle school science teacher, I have taught Earth, Life and Physical sciences, including topics in environmental science and renewable energy for more than 11 years. In the last 20 years I have taught using all of my endorsements except for

the principal's endorsement. My Resume and Transcripts are attached as *Exhibit TL-JB-1* and *Exhibit TL-JB-2*.

Q.3 Have you previously provided testimony before the Vermont Public Utility Commission, or in other judicial or administrative proceedings?

A.3 No, I have not, which I feel has put me at a disadvantage since I am unfamiliar with the language and process.

Q.4 What is the purpose of your testimony?

A.4 My testimony addresses the impacts of the proposed solar project on the Town of Lowell, including impacts on orderly development, aesthetics, the natural environment and natural resources, prime agricultural lands, public health and safety, water quality, environmental justice concerns and the general public good. My testimony also reiterates the Town of Lowell's assertions regarding the project's interference with orderly development and noncompliance with the Town Plan, which have been previously conveyed by the Town in public comments. My testimony also addresses the project's noncompliance with the NVDA Regional Plan.

Q.5 Describe your familiarity with the project and the project parcel.

A.5 I have reviewed the project site plans and the testimony filed by the developer. I attended the site visit on December 12th, 2025 and observed how vastly out of character the proposed solar array will be with the surrounding landscape. I have looked at this field every day on my drive to work and on my walk into the school. It is the first thing I see every day when I leave. I

have visited each of the intervenors' properties and looked at the view from their homes. I have gone sledding with students every year for our school's winter carnival for the past 15 years.

--Orderly Development 30 VSA §248(b)(1)

Q.6 Is it the recommendation of the Town of Lowell that the PUC find that the project does not satisfy criteria 30 VSA §248(b)(5) because it interferes with orderly development of the region?

A.6 Yes

Q.7 Please explain in detail how the proposed project contravenes the Lowell Town Plan.

A.7 The proposed project contravenes specific provisions of the Lowell Town Plan as well as its overarching themes and intentions for the future development of our community. Please see Gordon Spencer's prefiled testimony and report on the Orderly Development of the Region. *Exhibit TL-GS-2.*

The Town of Lowell found several pages to reference where the Northland Solar project contravenes the Town Plan *Exhibit TL-GS-3*.

> Town Plan Page 7: *A comprehensive town plan and land use regulations allow Lowell to control growth and types of land use. Not only is a current town plan necessary should any amendments to the zoning be desired, but major projects that come under Vermont's Land Use and Development Act (Act 250) must conform to a current town plan.*

This statement led me, as a relatively new selectboard member, to believe this plan would be binding and would allow the town to control land development. I have now learned that energy

development subject to PUC regulation can disregard local land use regulations and town plan mandates, even when the Town contests the development.

> Town Plan Page 7: *Since communities exist primarily for the health and enjoyment of those who live in them, it follows that the nature, location and timing of community growth should be determined by the people of Lowell rather than left solely to chance or to the decisions of non-resident developers.*

This statement shows that communities are created by the people who enjoy living in that place. Our job as selectboard members is to ensure their health and enjoyment. This solar project does not fit any of those needs. We put this plan in place so that non-resident developers such as Thomas Hand would not take advantage of our community. Mr. Hand is here to develop this property only and will not be part of our community after the project is completed.

> Town Plan Page 7: *The intent of this plan is not to eliminate any existing land uses or to stop all future development, but rather to channel the desired growth to appropriate locations within the town.*

The Northland Solar project is not in an appropriate location. Being located close to substations does not make it an appropriate site when considering the adjoining land owners and the impact on views from their windows, especially Douglas and Deborah Manning's home since it sits above the solar panels and will have them aimed directly at his home as they face east in the morning. There is significant potential for solar glare. The site is directly across from the Lowell Graded School and sits on a portion of the school's Source water protection area for the drinking water. A water line is buried along the southern edge of the solar project site. This site is prime ag soil and has been farmed since 1902 and is next to deer wintering habitat and habitat corridor.

We understand that the site has been identified by Petitioner's experts as a grassland bird habitat, and as such, it should not be disturbed or diminished. The site is also adjacent to our village center and is the only viable location for housing in the future if the town should choose to pursue additional housing development.

Town Plan Vision Statement

Town Plan Page 8: *It is the primary and fundamental intention of Lowell to remain a rural, agricultural town that encourages farming and a town that encourages individual businesses and entrepreneurship of a scale that can integrate harmoniously into its residential areas.*

The Northland Solar project does not integrate harmoniously into its residential areas. If it did there would not be so much push back by public comments or intervenors. It directly goes against agriculture and farming since large solar projects are known to damage agricultural soil which is why it has to be removed, piled and retained for the life of the project, which has been shown to be ineffective for preserving the soil. The Northland Solar project degrades the Town's primary intention to remain rural since it fills an open green space at a key visual location in our community with industrial solar panels.

Goals & Objectives

Town Plan page 8. *The primary goal of this Town Plan is to provide for Lowell's residents: to further their opportunities to maintain an adequate and satisfying livelihood, to foster harmony among neighbors and to protect and maintain the rural lifestyle we all enjoy.*

The Northland Solar project does not foster harmony among neighbors.

I refer here to the Direct Prefiled Testimony of Gordon Spencer, our Lowell Town Zoning Administrator. On this particular point Mr. Spencer states, on page 3, "*The solar project infringes on the major town goal of maintaining a rural, agricultural town – with farmland in dwindling supply and the solar site actively farmed for more than 100 years. The location of a solar project proposed by non-resident developers in the village center minimizes the ability of the Town to enable future development that can integrate harmoniously into residential areas."*

First Objective

Town Plan Page 8: *Ensure all residents have their property rights both respected and protected."*

The Northland Solar project disrespected adjoining landowners' property rights. This site is unsuitable, and intensely impacts adjoining landowners, degrading their quality of life and enjoyment of their property. See, Direct Prefiled Testimony of Douglas and Deborah Manning. The "merchant generator" system of siting solar development favors sites selected on the basis of money to be made and ease of creating a project and tax credits, rather than impacts on adjoining property owners and town residents. The process affords scant attention to those who live nearby, whether they want solar panels as their main view and whether they will miss the wildlife that will be displaced and driven away.

Second Objective

Town Plan Page 8*: The growth of Lowell should occur in such a way as to enable residents to continue to live in town without undue tax burdens.*

Eighth Objective

Town Plan Page 9: *Maintain the Town's beautiful rural character as much as possible – eliminating junk yards and unsightly areas.*

The 14,000 solar panels are unsightly, shocking and offensive to our residents. This rural space is our home. We do not live in an industrialized area; our communal ideas and thoughts come from being one with nature, completely surrounded by it. That is part of what makes where we live beautiful. The view of open spaces surrounded by forest expanses provide a depth and beauty in layers of green with the mountains in the background adding to the beauty. This solar development would comprise an "unsightly area" degrading the quality of living in our Town.

Thirteenth Objective

Town Plan Page 9: *Encourage open farmland for agricultural purposes and find new ways to support career farmers and hobby farmers to ensure they can continue their appreciated endeavor.*

The Northland Solar project is in complete opposition to this objective as it destroys and removes the opportunity for farmers to use this land which has not only been active up to this point but farmed since at least 1902.

I would further like to acknowledge the alignment of Michael Tetreault's prefiled testimony and his expertise when discussing Prime ag land on page 2 *, "The site consists of prime and statewide important agricultural soils, which are essential to Lowell's working landscape and long-term food security. Once compacted, graded, or covered by solar infrastructure, these soils cannot be restored. Siting a nearly 5 MW industrial facility on this land contradicts Vermont's statutory protections for primary agricultural soils."*

Housing Demand

Town Plan Page 18: *According to the 10-year tax data, residential and seasonal uses are by far the most predominant and economically profitable use for the Town. The density of development should be dependent upon the availability of access and the ability of the soil to handle on site water and sewer systems without creating water quality problems. Residents will also have to adhere to state and federal regulations as to the placement of water wells and septic systems.*

When looking at our housing data and what was described for availability access we have to consider how well a site will handle water and sewer systems. The site proposed by Northland Solar is one of the best sites for housing development as it is great for sewer and water. It is not in the flood zone like many of the potential properties or building sites along route 100 or Rte 58 as they tend to follow the river. We have very few sites in Lowell for development or to meet housing needs and this is one of the best.

Gordon Spencer states in his Direct Prefiled Testimony on page 4 "Lowell identifies the Village area as the most efficient and easy location for future residential and business growth. The visual character, scale, and materials of an industrial solar array conflict with this view of the future growth of the area."

Village Character

Town Plan Page 20: *The Planning Commission is proud of the Town's historic village and wants to encourage the revival of some original aesthetics it once possessed. The Planning Commission aims to maintain the integrity of all public areas of the town to*

these standards to encourage residents to follow, bringing the town's core to its original charm.

We as a town are interested in preserving our original aesthetics and to foster the historic village. The Mountain View Cemetery is a historic location within the village and we wish to preserve its pastoral setting and beautiful views. See the Direct Prefiled Testimony and Exhibits of Byron Dolar. We as a Selectboard want to maintain the town's original charm, and 14,000 solar panels do not offer any charm.

Wet Meadow

Town Plan Page 25*: A wetland dominated by grasses, sedges, and other forbs with saturated soil near the surface but without standing water for most of the year.*

Screenshot of Natural Resources Map with Northland Solar Overlay, demonstrates that there is a wet meadow, deemed wetland in early spring, in the field Northland Solar proposes using for the site. *Exhibit TL-JB-9*

Wetlands are important for protecting our drinking water and in that specific area are resident water supplies and it is near the school water supply protection area. The Town plan states at page 24 that "Wetlands are also important for the maintenance of water quality. The biological activity of a wetland area enables the absorption and assimilation of nutrients and thus purifies to some extent the water which is discharged."

The Natural Resources Map identifies multiple Class 2 Wetlands in the vicinity of the Northland Solar project. *Exhibit TL-GS-3, p. 26*.

Economic Plan for the Future

Town Plan Page 42: *Although Lowell expects that there will be slow to no growth for the next 5 years, we would hope to see growth in the following areas:*

- *Small Industry- this could be a production type business or some service business that would support a regional need and bring financial support to the town and towns' people. These types of businesses are expected to be 20 employees or less but are not limited to 20.*
- *The other area is for Home Business growth potentially providing services or operating professional offices.*
- *There is also still opportunity to reestablish small scale agriculture utilizing the open and available lands. The main goal is to provide a mean livable wage for local and Townspeople as Industry Develops.*

The Northland Solar project does not bring benefits to our town as stated above or anything that fits with our town plan Any jobs related to construction are temporary, and most likely to involve firms hired in from out of the area. Going forward, financial benefit to the Town will be limited to modest property tax payments; no jobs will be created in our community. No economic vitality will arise from the project. Potential benefit to the electric grid, if any, is not of benefit to the local community. The local community, however, will forever bear the burden of the project's detrimental aesthetic and environmental impacts.

Recreational Planning

Town Plan Page 48*: The Planning Commission does not see the need currently to recommend any kind of an organized recreation program. However, because Lowell's*

recreational opportunities are dependent on the quality of Lowell's environment, it is necessary to protect and maintain Lowell's wonderful natural resources including the trails and streams, from development damage.

The Town Plan clearly states that it is important for Lowell to preserve our natural resources including trails and streams from development damage. Thomas Hand clearly states that he plans to ask for permits to make changes that will directly impact Le Clair Brook.

Gordon Spencer further explains how we as a community access agricultural spaces for recreation in different seasons by stating on page 5 of his Direct Prefiled Testimony "It is not only the views from the roads that impacts but the on-foot exploration of village and forests and fields. The existing open field farm land serves as a virtual nature contact park augmenting agricultural use."

Energy

Town Plan Page 52: *The land leased for the project has been an active logging operation for decades. Of the thousands of acres that comprise Lowell Mountain a total of 135 acres was used for the wind plant. Direct impact to bear habitat totaled 20 acres, impact to wetlands totaled half an acre, and for high level wetlands the impact was one-tenth of an acre. To mitigate these impacts and the habitat fragmentation caused by the road, GMP procured conservation easements on over 2,800 acres. The conserved area includes over 1,100 acres on Lowell Mountain, and over 1,600 acres in Eden connecting important wildlife corridors between Green River Reservoir and the Lowell wildlife habitat area.*

This Town Plan provision describing the ecological impacts of the Kingdom Community Wind project demonstrates what the Town of Lowell conceded in order to create green energy that supplies over 24,000 homes. Bear habitat was impacted. There were also impacts to wetlands. Forest habitat was fragmented by access road development. Yet, offsetting these impacts, GMP made a substantial impact on land conservation in our community. This demonstrates the difference between merchant-generator projects such as the present solar array, and utility projects, which have greater accountability to the public. The Northland Solar project would have substantial, immediate impacts on our community, degrading our landscape in a location in constant view of all residents at the school, neighbors, and anyone driving through our community. Yet there is not any concomitant "offset" of any type; no securing of open space elsewhere in the town for public use, no conservation easements, no securing of farmland to be available to start-up farmers. The lasting impact of Kingdom Community Wind on our Community is embedded in our Town Plan as well as our communal consciousness: The Town has given up enough already to the purpose of renewable energy. To burden us further not only violates our Town Plan, but is profoundly unjust.

Town Plan Page 53: *The Town has a total installed grid-connected solar capacity of 272 kW. For those who are unable to install solar panels on their own property, Vermont Electric Coop operates a community solar program that allows customers to sponsor a panel in return for a fixed monthly credit on their bill. Additional solar development in the area is limited, largely due to the massive amount of energy the Northeast Kingdom already generates.*

The Town Plan is clear that there is no need for a large solar project of this scale in our town. The community's solar energy needs are served by solar panels installed on residents' homes, and by VEC's solar panel sponsoring program. The Northland Solar project would not serve our community; it does not serve the present and future energy needs of our Town.

Town Plan Page 59: *Route 58 is perhaps the most scenic road in Lowell. This highway passes over some of the higher elevations in Lowell and offers some spectacular views. That section of Route 58 between Irasburg and Route 100 crosses an elevation of almost 1,700 feet above sea level.*

Our town plan highlights the beauty to be found when driving along Rte 58. The views along the drive as described above as one travels Rte 58 to the historic section of the road that the state deems as the scenic Bayley Hazen Road will be affected by the solar development. Sadly, this will impact tourists' desires to travel our roads and spend time in our community enjoying the natural beauty of our landscape.

Environment

Town Plan Page 61: *The average annual snowfall in Lowell is 97.5" with the record being set on March 7, 2011 for most snowfall in a 24 hour period when the town received 26" of snow.*

Lowell receives more snow than is typical in most Vermont towns. That snow can become very heavy and directly impact the solar panels and their ability to function for at least 6 months out of the year.

As I travel Vermont roads I have seen panels covered and have heard residents state that their solar panels do not produce electricity in the winter months. I have also seen Vermont solar panels collapse from the weight of snow even though those panels were not in what I would refer to as the snowbelt. The nearby ski resort Jay Peak, located within 20 minutes of Lowell, has received 347 inches of snow while Stowe Mountain Resort has 258 inches and Smuggler's Notch has 268 inches suggesting Lowell gets some of the most snowfall in Vermont. Skiers and snowmachiners travel to the Northeast Kingdom because we have snow, lots of it. There was over two feet of snow on the ground in early December, severely impeding the site visit to the proposed solar array location.

Agricultural Land Use and Goals

Town Plan Page 74. *Farming and agriculture will remain an important and viable sector of the regional economy. Contiguous tracts of prime agricultural soils will be preserved.* As Gordon Spencer reported in Exhibit TL-GS-3 Page 6: *"Contiguous tracts of prime farm land have added value and especially they are the central element or component of the historic and preferred identity and character."*

The Northland Solar project is located on prime agricultural soil and violates the mandate of our Town Plan that such soils will be preserved.

Lowell, VT Act 171 Map shows Habitat Blocks as of 2020 *Exhibit TL-GS-3, pg 76*

This map clearly shows that the proposed site is surrounded by a very large habitat block of 10,000 to 50,000 acres. This is the field that I mentioned in the NVDA testimony as being a small habitat corridor.

The proposed Northland Solar Project contravenes the Lowell Town Plan and would unduly interfere with the Orderly Development of the Region.

Q.8 Have you reviewed the public comment letter of the NVDA, and do you agree with your regional planning commission's position that the proposed project contravenes the Regional Plan?

A.8 Yes

Q.9 Please describe in detail how it contravenes the Regional Plan.

A.9 The Town concurs with the Executive Director David Snedeker that the Northland Solar project contravenes the Northeast Regional Development plan on several key factors that I would like to specifically highlight below after first addressing David Snedeker's public comment listed as evidence *Exhibit TL-JB-4.* David Snedeker, the Executive Director of the Northeastern Vermont Development Association (NVDA), submitted a Public Comment on November 10, 2025 in Case #25-2346-PET where he reiterates for the record key policies from the NVDA Regional Energy Plan 2023, pgs 20 and 21, regarding the development of renewable energy including: *"Any utility-scale energy generation project deemed acceptable by the Public Utility Commission shall include a plan for distributing benefits to the towns in the region proportional to the adverse effects experienced by that town."; "This plan aims to balance environmental quality and important natural resources with energy production, with special emphasis on the value of forest lands in sequestering and storing carbon."; and "Significant local and regional support and clearly demonstrated benefits, especially affordability and accessibility, should exist in any energy proposal."* Also of significance, Mr. Snedeker states the NVDA's Regional Land

Use Policy that *"Rural areas should receive very little commercial or industrial development unless it occurs in an established industrial park, or in an area specifically designated in the local bylaw or plan as being well suited to such uses."*

Next, I have separated specific parts of the Regional Plan *Exhibit TL-GS-4* with page numbers and direct quotes from the plan with my thoughts about how I see the proposed project is in direct violation of the orderly development described therein.

Land Use Section

Pg 11- I would like to point out where NVDA that directly works with our town and surrounding towns stands on Agricultural Land Use Goals: "*Farming and agriculture will remain an important and viable sector of the regional economy. • Contiguous tracts of agricultural soils will be preserved. • Development of residential and commercial uses will not significantly reduce the amount of open and productive farm land."* This particular project is indeed on active agricultural farm land in continuous use since 1902. The Town of Lowell has kept this tract of land labeled as rural agricultural land even though it is surrounded by village designation because of its active agricultural use. Also, as you can see from *Exhibit TL-JB-6,* this farm land is contiguous and would be fragmented if solar panels were installed. This solar project significantly reduces the amount of open and productive farmland if you look at the aforementioned video. It is one of the largest tracts of active farm land in its vicinity.

Pg 11- Under Recreational Land Use Goals it is stated that *"Sufficient open space will be available for current and future outdoor recreational pursuits."* Among other recreational uses, this field is currently used for the VAST Trail System and sledding by Lowell Graded School students each year for their Winter Carnival, and although Thomas Hand has stated these activities may continue, how can the Town of Lowell be assured of that when his company has only kept 4 of their 20 plus projects?

Pg 14 Current Land Use Map- When looking closely by zooming in on the provided Lowell portion of this map you can see there are very few open agricultural land areas, indicated by the light green shading. Note that the connected green areas closer to the Westfield border are mostly in a flood zone making them less viable for long-term crop use. The field proposed for solar is a great opportunity for agriculture based on its long standing use of 124 years and the type of soil being sandy, it is not likely to be wetland and it is not located in the flood zone.

Pg 15 Brownfields- The Town of Lowell would not be opposed to this solar project if the proposed location was a local brownfield such as the asbestos mine. Even considering the views, the asbestos mine is already visible. The NVDA states *"Questionable or contaminated sites in the region are commonly located in or near urban areas with existing industrial infrastructure. Often, the responsible parties are no longer owners of the property; others are businesses that are now defunct; and though local governments are often aware of such problems, they have no money for clean-up. The remediation of contaminated properties faces several obstacles. The potential for hidden, open-ended costs associated with cleanup is often enough to keep*

developers away. Current liability issues and low prices of prime developable land ("greenfields") make the reuse of some sites unlikely without incentives. Unfortunately, what is left is frequently a vacant or abandoned eyesore and potential health hazard. Abandoned sites do not contribute significantly to the property tax base and contaminated sites lower the property values of surrounding lots. Reasons to reuse or redevelop brownfield sites include bringing unused properties back onto the tax rolls, maintaining local property values, and alleviating the need to build new sewer, energy, and transportation infrastructure. Reuse also reinforces efforts to maintain traditional development patterns by encouraging compact development and reducing pressures on undeveloped land." This is a very good summary of the problems our town faces and a way that this solar development company could have a positive impact in our community.

Pg 22, lines 9-15 Rural Areas - From the following quote the Town of Lowell is considered rural and the current proposed solar site by Northland Solar is not well suited for its location. *"Rural Areas Most of the region's land lies outside of the town and village centers. It consists mainly of the farms and forestlands of the traditional Vermont landscape. These land uses are supported by the regional urban centers, service centers, and rural villages, where most of the people and commerce are located. These rural areas should receive very little commercial or industrial development unless it occurs in an established industrial park, or in an area specifically designated in the local zoning bylaw or identified in the Town Plan as being well suited to such uses."*

Pg 24, lines 1-13- From the NVDA Plan concerning developing rural areas, the Town of Lowell meets several of the cited conservation attributes: the lands surrounding the proposed project are deemed Forested Coverage of more than 25 acres; headwaters are recognized as there are water pipes crossing this land; and wells are located just to the east of the property. Finally, it is surrounded by a forest habitat block for deer wintering. *"Nevertheless, rural lands containing one or more of the following conservation attributes, shall be considered exceptionally sensitive and shall therefore not be designated as appropriate for commercial or industrial development that is not directly related to the region's lands-based economy (i.e. forestry, agriculture, and recreation):*

- *State natural areas and fragile areas: The region has two such areas, which are both designated as National Natural Landmarks, the Willoughby Cliffs area and the Barton River Marsh.*
- *Lands managed by the Department of Forest Parks and Recreation*
- *Highest priority forest habitat blocks*
- *Forested coverage of Site Class 1, 2, and 3 soils of 25 acres or more*
- *Headwaters*
- *Upland areas of 2,000 or higher Lands containing one or more of these attributes shall not be developed, as their best uses are a combination of forest and conservation purposes."*

Pg 26, lines 29-32- Concerning the development of the Town of Lowell, the proposed solar site is directly across from our village center and although our town would prefer to maintain its agricultural land and green spaces, this solar project would severely limit the potential for future

housing in the center of our village as recommended since there would be very little land left suitable for building. *"Established centers will be an economically vital mix of commercial and residential uses, and will offer a variety of housing types available at different price points to support long-term sustainability. • Towns will be supported in identifying and implementing strategies that reverses the current trend of new residential development occurring primarily outside of centers."*

Line 34 states *"New development will be compatible with existing land uses, and consistent with local plans."* The Northland Solar project does neither. It is not compatible with the existing land use of active farm land and it is not consistent with our Town Plan as identified and stated in earlier testimony.

Energy Section

NVDA Executive Director David Snedeker submitted Supplemental Comments on March 2, 2026 that are of critical importance to the PUC's review of the Northland Solar Project. *Exhibit TL-JB-10*. My testimony here reviews the Northeast Regional Development Plan provisions relating to how this project impacts our town regarding energy.

Mr. Snedecker's comments speak to our region being a net exporter. The Town of Lowell has experience with being a net exporter of energy. The Town and its residents are not against renewable energy; many residents have solar at their homes to help with the renewable energy goals of the state. Our town hosts The Kingdom Community Wind Project that generates enough

energy for 26,000 homes and for which Green Mountain Energy compensated our town for the loss of the view by paying down our municipal tax rate. We have sustained jobs for locals throughout that time period as well. However, the Town of Lowell finds the Northland Solar project unnecessary, as we already generate power for the state of Vermont far exceeding our use.

Natural Resources

> Regional Plan Page 172: *The Northeast Kingdom is recognized for its diverse wildlife, large undeveloped areas, and vast woodlands. The region's natural resources (depicted in Figure 7.1 on the following page) provide residents and others a variety of benefits. The largest source of revenue in the region is from outdoor recreation, and much of the tourism industry relies on the healthy and scenic environment to remain viable. Therefore, the natural resources in the Northeast Kingdom have intrinsic scenic and economic values that require careful consideration when making planning decisions. The overarching goal for the region is to balance local economic needs with the protection of the resources that so many of the region's residents enjoy and depend upon.*

This quote very well summarizes and captures how I feel about where I live in Lowell. I interact with the wildlife on a regular basis since you can't live here without their daily shenanigans. Part of living here is watching wildlife in their habitat which is also my backyard: viewing their habits through game cameras; seeing their presence when snowshoeing; chance encounters when hiking. You have to love the animals when you choose to live here or they would certainly annoy you. It was their home first. Another critical factor to consider is that the largest source

of revenue in our region is outdoor recreation, which directly relates to the health and beauty of the environment. I will be submitting further evidence through aesthetics as to how the solar panels impact the scenic environment and further have a negative impact on the health of the environment adversely impacting both the residents, tourists and animals that live here.

Soils pg 180. As I read the lengthy document created by the NVDA and the various aspects of the Northeast Kingdom I found adverse effects for the Northland Solar project to be located in the proposed location. The Northland Solar project site location is completely wrong for our community. This next part discusses the soil of the site location which is prime agricultural farm land. This particular property has been farm land since 1902 as seen in the provided deed. As a middle school science teacher who teaches Earth, Life and Physical Sciences to students I can clearly see the connection between the soil and our water being safe and clean from the following statement in the Regional Plan, *"Soil is influenced by the organic matter that is deposited on the surface and by the organisms that exist within it, in combination with parent materials. Within soils, organisms and fungi provide food for animals and create organic matter for more efficient vegetative production. This vegetative layer, in turn, helps to purify surface water."* In order to preserve this agricultural soil for future use in 25 to 30 years, Thomas Hand states that the soil will be moved into piles so it will no longer protect the groundwater by helping to purify the contaminants coming from the solar panels.

Soil Compaction pg 181

The importance of the soil explained on pg 180 leads me to further be concerned by what I read about the impacts of soil compaction. *"Compacted soil, which occurs naturally, as well as through land development and industrial processes, makes it more difficult for water to be absorbed. This creates two changes to the soil formation process. First, water cannot flow through the soils in order to leach contaminated particles. Second, it creates erosion and carries away soil. As discussed under water resources, erosion contributes to flooding, removal of productive topsoil, distribution of chemicals on the soil, and sedimentation of surface water."* This leads me to understand as a science educator that the installation of solar panels on this site would result in soil compaction making it harder for the soil to absorb water, leading to runoff possibly impacting surface water and Le Clair Brook, which the developer would like to alter, a subject that has not yet been discussed, or the impact to the wetland that is supposedly not close enough. I would like to also draw your attention to the "leaching of contaminated particles." Another piece of evidence for why this project should not be on this site in Lowell.

Habitat Connectors pg 182

> *"Habitat connectors refers to land or water that links larger patches of habitat within a landscape to allow for the movement, migration, and dispersal of animals and plants. They can be a forest block, riparian area, or a specific road crossing that wildlife repeatedly use. Examples include small habitat blocks that serve as stepping stones between core forest, riparian habitat along streams and rivers, strips of forest cover between developed areas, hedgerows, or fencerows. Sizes can range from a fraction of an*

acre to one or two hundred acres. Movement of animals from one habitat patch to another is the most common function attributed to habitat connectors. This is true for both wide and small ranged animals. Bobcats and black bears might use connections quite frequently, whereas spotted salamanders might use them only a few nights each spring to move from hibernation sites to breeding pools."

This particular field is habitat for grassland birds, specifically Bobolinks which were present on both visits as captured by Arrowwood Environmental in their report *Exhibit NS-MLS-2*.

Looking closer at the Habitat Blocks listed on the map on pg 186 on a scale of 1 to 10 the field in question is a minimum of a 5 in importance and I dare say up to an 8. It is difficult to judge precisely from the map. The map includes many unimportant habitat blocks suitable for a solar field, but Lowell does not include such blocks. That our town is of significance and deserves to be protected as habitat is something we pride ourselves on and can be seen in this map as being important.

Open Space pg 187

"The Northeast Kingdom is composed of rolling hills, farmlands, lakes and rivers, forests, country roads, and compact village centers. These areas combined create an open, picturesque landscape unlike any other. Open space provides not only scenic beauty and wildlife habitat, but is necessary for the numerous outdoor activities enjoyed by the region's residents and visitors, and is key to the agricultural and forestry traditions of the region." This particular field in question demonstrates the kind of open space described in this quote from NVDA's Regional Plan. It is picturesque even in winter as shown in *Exhibit TL-JB-6* and provides scenic beauty in

its connection to its surroundings. When I look at the beauty in the pictures and videos from Doug, I would certainly find 14,000 solar panels offensive and shocking to this view. We have already documented the wildlife habitat. Yet, there are many outdoor activities which use this field including sledding by Lowell Graded School children, the VAST trail for snowmachiners, snowshoeing, the Catamount Trail which passes very nearby and the Long Trail that is the entire Mountain range to the west of the project with some visibility expected.

Conserved Lands Map Pg 188

This map shows that to the South and East of this field it is surrounded by conserved land which further supports the habitat block mentioned above. Once again I have provided a screen shot to look more closely at this with the full map view. *Exhibit TL-JB-17.*

Natural Resources Goals Pg 189

Several of the goals listed show that the goals of the NVDA Regional plan are in direct conflict with the Northland Solar project. Specifically, the following bulleted Goals pertain to this case:

- *The overarching goal for the region is to balance local economic needs with the protection of the natural resource that so many of the region's residents enjoy and depend upon.*
- *The quality and quantity of the region's surface waters should be protected, maintained, and restored.*
- *The quality and quantity of existing and potential groundwater resources should be protected and improved.*

• Significant wetlands within the region should be protected. The region's mineral and soil resources should be used in a manner that will support the sustainable growth and development of the region.

• Private, public and community interests should be considered in matters affecting local recreation and open space.

David Snedeker, the NVDA Executive Director, addresses in his **Public Comment and additional Supplemental Comments** *Exhibit TL-JB-10,* stating in conclusion *"The Northeast Kingdom is already a net renewable energy exporter contributing disproportionately to Vermont's clean energy portfolio. Further concentration of utility-scale generation in non-preferred, rural locations — absent direct and measurable local benefits —raises both regional planning conflicts and environmental justice concerns. For these reasons, we urge the Commission to carefully weigh the substantial deference owed to the NVDA Regional Plan and determine that the proposed project does not align with duly adopted regional energy and land use policies."*

On these grounds the Town of Lowell is compelled to ask the Public Utility Commission to deny the Northland Solar Project a Certificate of Public Good for the many ways that this project contravenes with the Orderly Development of our Northeast Regional Development Plan.

--Aesthetic Impact, 30 VSA §248(b)(5) and 10 VSA §6086(a)(8)
will not have an undue adverse effect on the scenic or natural beauty of the area, aesthetics, historic sites, or rare and irreplaceable natural areas.

Q.10 How and why will the proposed solar installation affect the many who appreciate Mountain View Cemetery's historic and cultural significance?

A.10 The Mountain View Cemetery is of historic and cultural significance to our town. Cemetery President and generational resident Byron Dolan also discusses undue adverse effects in his Prefiled Direct Testimony that I would like to acknowledge here, before moving on to my own comments about the relevance of this cemetery with its documented history dating back to the origination of our town founding fathers.

The Mountain View Cemetery in Lowell, Vermont has burials dating back to 1813, specifically Isaac Woods was interred that year in section 5 of the cemetery. The town was first established March 5, 1787 as a charter by the title Kelleyvale. I took some time to read what the Old Stone House Museum *Exhibit TL-JB-12* has written about Lowell on its website which is also stated on page 9 in the Lowell Town Plan. I learned about the early settlers of Lowell and found that two individuals who were the first settlers and creators of our town are buried in the Mountain View Cemetery. The first is Major William Caldwell about whom the Old Stone House Museum site *Exhibit TL-JB-12* stated "The first settler was Major Wm. Caldwell, from Barre, Mass, who began to make improvements on his land in the year 1803, but did not move his family into town until April, 1806." He is buried at the Mountain View Cemetery in Row 6 along with his wife. Then there was John Harding and his wife who are buried in row 4. He is the son of the original John Harding. The *Exhibit TL-JB-12* states *"In the Spring of 1807, came John Harding, assisted by four others, drawing his family and goods into town on hand-sleds; others soon followed."* The Lowell Town Plan *Exhibit TL-GS-3* on page 9 states something very similar for both of these men *"The first settlement was commenced by Major Caldwell from Barre, Massachusetts*

in 1803. He moved his family here in April, 1806. In 1807 John Harding came to town, drawing with the assistance of four others his family and goods on three hand sleds. He settled on what became the Philip Geoffroy farm, it is believed." I share this information and evidence as a basis for the cultural significance of the Mountain View Cemetery and the history that is the very beginnings and roots of our established town and how the views of the Northland Solar project shown in Byron Dolan's testimony would be shocking and offensive and that the Northland Solar project would have undue adverse effect on our views from this culturally and most historic site.

Both of these images *Exhibit TL-JB-7*, *Exhibit TL-JB-8* provided by Douglas Manning show the Cemetery and the hedgerow which Northland Solar has deemed sufficient to block views from the cemetery of the field covered by 14,000 solar panels. It will be shocking and offensive to all who visit this cemetery, to all who have family buried there, and to all who live in our town. As requested for the Site Visit, the Petitioner had marked the boundaries of the array with flags, which covered the entire field from edge to edge, north to south, and to the east all the way to adjoining property owner and Intervenor Douglas and Deborah Manning's treeline. Since it was winter it was easy to see that the hedgerows discussed in the development plan are inadequate and provide little visibility cover when defoliated from October to April.

I, as a resident who lives and works in Lowell, also view the site daily as I walk from my car in the Lowell Graded School parking lot into school. It is a wondrous sight as the sun rises over the field and trees that surround it. On mornings with fog it is hard to describe its beauty. I love it

being sheer white in the winter, as much as I do in the summer being so many shades of green. I have been told that in order for it to pass the Quechee test it has to be unduly shocking and offensive. The solar panels littering this field will be just that, and to mitigate its adverse effect, the developers and their landscape architect suggest the entire view be blocked with trees so you won't be able to watch the sunrise over the mountain, see the fog rise from the field in the early morning, and or listen to the grassland birds singing as it all unfolds. This view is also the first thing I see when I leave school, and no matter what my day has been like, it sustains me, and I find a sense of peace just knowing I live and work in one of the most beautiful places in the world. I do not say that lightly. I have had the privilege to visit many state and national parks and have traveled to Europe. I also had the amazing opportunity to visit the Amazon Rainforest with the Morpho Institute in July 2024. I was on the Amazon River for hours and stayed at the Amazon Conservatory of Tropical Studies (ACTS) Field Station, which hosts the longest canopy walk in the world where I could see the Amazon Rainforest from above the Canopy. I was surrounded by a view that covered over a million acres of connected rainforest, and yet I find the Town of Lowell to be as beautiful, if not more so. I remember the conversations about conservation and sustainability, along with the abundance of green that surrounded us during that trip. Just knowing that this field in Lowell could be developed even though we as the Town Selectboard identify this as a poor site to put industrial solar for all the reasons already written in this testimony on behalf of the town, makes me as a resident and Selectboard member feel that our voices are as unheard as those of the indigenous Maijuna people of the Amazon rainforest and Guardians of the Trees, confronting the Peruvian Government, who in the name of progress wants to cut down the forest. The leader of their group asked me to come back and tell their

story, and never in a million years did I think I would wish I had someone to tell my story or help me preserve my own sacred spaces.

The town shares the concerns of its residents most profoundly affected by the views Douglas and Deborah Manning, Madonna Sullivan, Michael and Pam Tetreault, the Lowell Graded School, and the Mountain View Cemetery.

Madonna Sullivan's Home

As I stood in the back of her home on a beautiful winter day it was clear to me that there is no way the Northland Solar Project could be deemed acceptable. Her entire backyard has no blockage from the array and her second story windows would have views of the array no matter the size of the tree plantings. She stated in her testimony that she uses a portion of her home as an art studio, shared with the public, and that would have a commanding view of the solar array. The view would be shocking and offensive to every artist and person who looks upon what was formerly a beautiful mountainside and vast green open space, but would become a stark, unwelcoming, inharmonious space as the solar panels would occupy the entire focal point. The view would be the opposite of what it currently is, which is majestic.

Douglas and Deborah Manning's Home

During a visit to Douglas and Deborah Manning's home they spoke of its location and design. They purposely designed their home to take advantage of the impressive views. From each of their home's three stories the field in question is prominently visible with beautiful uninterrupted

views of the Green Mountains beyond. Douglas grew up in Lowell and loves the land he had the pleasure of working when he was young. He built here and has planned to retire here enjoying the view that has been a connection to his youth and many memories over the years. He and Deborah have encountered many experiences with wildlife and have enjoyed watching the children from the Lowell Graded School sledding during their annual Winter Carnival. Deborah has shared that she cross country skis and accesses trails from this field. Douglas accesses the snowmobile VAST trail as well from this field. When I look at the devastation the Northland solar array would have on his home my heart breaks for their loss which goes beyond shocking and offensive, leading to emotions of anger and upset. This makes me sad on so many levels because of the devastating loss that is deeper than aesthetics. It is attached to the heart and love, and dare I say a level of reverence that comes from investing your work and finances into a home where you plan to spend the rest of your life with your favorite person, your partner, to enjoy and hold dear.

Please refer to Douglas and Deborah Manning's testimony.

To go further and think more deliberately about the impacts of this project on local residents and adjoining town owners, we need to speak to the glare that will have definite impacts, noting that Thomas Hand has not done his due diligence to be certain that there will be none. In the first round of discovery to the following question about **Reflection and Glare** in *Exhibit TL-JB_14* Q.TOL.NS.1-16 *"Admit that the solar panels could cause a reflection of sunlight affecting homes and/or buildings on the eastern and western side of the project."* Thomas Hand

specifically states *"Response: Admitted that some sunlight reflection is possible on any surface, including solar panels, but denied that the reflection is likely to be of a level to affect homes or buildings near the project. The panels are designed to absorb sunlight and anti reflective coatings are standard on modern modules to improve their light capturing and power production."* He speaks about it without actual knowledge of what the solar panels will do, but rather what they should do. This is not a good enough answer when thinking about direct impacts to someone's home. What if this was your home? 14,000 solar panels receiving light directed and facing your home every day for the rest of your life. That is not okay and is definitely shocking and offensive, even traumatic and devastating, impacting one's health over time with the anxiety, anger, and sadness felt on a recurring daily basis.

I would like to draw attention to Michael Tetreault's concerns about the potential for the glare to impact drivers on page 2 A7 of his prefiled testimony.

Douglas Manning further discusses in his prefiled testimony which I rely on as expert town testimony because he has first hand knowledge and skill in being project manager for several solar projects of this scale and bigger. He firmly states that he has never had a developer put a project in a location surrounded by homes, and further argues and shows through several images that these projects were not in eye sight of neighbors and the one time it was the developer purchased the home knowing full well that it would be deemed shocking and offensive. Douglas's expertise in understanding what makes a location a good site and how he has sited and worked with projects in the past supports the Town of Lowell's stance that this is not just a poor

site but the complete wrong site for our town. Further supporting why this CPG should be denied.

I would like to ask the PUC to heavily consider the report submitted by Walt Cudnohufsky and his colleagues as it directly speaks to the views from each intervenor's property, it considers the impacts in winter as well as what is missing from the aesthetic expert testimony done by Jeremy Owens. This encompassing, thoughtful report addresses all aspects of the Quechee Analysis. For the evidence cited in their prefiled testimony and report the Town of Lowell would ask that the CPG be denied.

--Natural Environment and Use of Natural Resources, 30 VSA §248(b)(5) particularly prime agricultural lands

Q.11 Will the Northland Solar Project have adverse impacts on the Natural Environment and Natural Resources for this property?

A.11 I speak to the Natural Environment and Use of Natural Resources area in both the Town plan A7 and in the NVDA A8.

Jeffrey Koch wrote prefiled testimony directly referencing significant resources about the impacts the Northland Solar project will have on our Grassland birds, more specifically the Bobolinks found there. He states on page 8 "*I do not believe mitigation is the right process as it is payment to a boblink's fund to be used to protect grassland bird habitat somewhere else. That does not help this population of nesting bobolinks, nor does it benefit the Town of Lowell, the project neighbors, or the Orleans County region. This petition should be denied or more studies*

should be allowed to be done this spring and the hearing postponed until after lengthier more substantial findings can be put together."

He also states on page 7 "*I believe it is in the best interest of the Agency of Natural Resources and the Public Utility Commission to find this property to be of significance for the grassland birds and for it to remain undeveloped, denying the petition.*" and *"In closing, this habitat should be deemed an RC2 grassland bird habitat and not a photovoltaic solar panel field."*

Jeffrey Koch in his prefiled testimony about water quality speaks very specifically to impacts on soil as well starting in question 16. The Town of Lowell is deeply concerned about the location of the Northland Solar project as it is sited for Prime Agricultural land that has been framed as previously stated since 1902. Jeff Koch clearly states the hazardous contaminants that will end up in the soil making this property ruined for future farming and the very real health concerns. Michael Tetreault is an expert witness for the town with his years of experience with farming and agriculture. He speaks directly to the impacts of this project in his prefiled testimony stating on page 2 "The proposed site is prime agricultural land" and further states *"The site consists of prime and statewide important agricultural soils, which are essential to Lowell's working landscape and long-term food security. Once compacted, graded, or covered by solar infrastructure, these soils cannot be restored. Siting a nearly 5 MW industrial facility on this land contradicts Vermont's statutory protections for primary agricultural soils."* He further states on page 3 *"They are not long-term land stewards, nor do they have any ongoing commitment to the agricultural community in Lowell. This is significant because the party*

selecting the site is not the party who will live with the long-term consequences of converting prime agricultural land into an industrial facility. Northland Solar's decision to target productive farmland—rather than commercial rooftops, brownfields, gravel pits, or other disturbed lands—reflects a siting approach that does not account for the economic, cultural, or environmental importance of agricultural soils in Lowell. Agriculture and agritourism are central to the town's identity and economy. The proposed site sits within one of Lowell's most visible scenic corridors, directly across from the school and surrounded by working farms. Converting this land into a nearly 5 MW industrial array undermines the agricultural character that draws visitors, supports local businesses, and sustains the community's long-term viability. Because MHG–Northland Solar does not intend to own or operate the facility long-term, they have little incentive to avoid harm to the agricultural community, the scenic corridor, or the tourism economy that depends on Lowell's working landscape. This disconnect between short-term development objectives and the community's long-term interests is inconsistent with responsible siting and with Vermont's statutory protections for primary agricultural soils. It also raises concerns under §248's orderly development and aesthetics criteria, as the developer's approach does not reflect a commitment to minimizing impacts or aligning with local values."

Lastly on behalf of the town as an agricultural expert Michael Tetreault's prefiled testimony states on the bottom of page 3 and into page 4 *"The proposed $165,000 decommissioning fund is not supported by any detailed cost analysis, and it is not sufficient to ensure that the site can be restored to its pre-project condition as prime agricultural land. Decommissioning a nearly 5 MW industrial solar facility requires removal of thousands of posts, anchors, underground conduit, transformers, fencing, access roads, and compacted areas. It also requires soil*

decompaction, regrading, and restoration of agricultural productivity—tasks that are significantly more complex and costly than simply removing panels. The developer has not provided evidence that $165,000 is adequate to perform these activities. In similar Vermont cases, decommissioning estimates for projects of comparable size have exceeded this amount, even without the added requirement of restoring prime soils to agricultural use. The cost of heavy equipment, labor, trucking, disposal, and soil remediation has increased substantially in recent years, and no inflation factor or contingency is included in the developer's estimate. Most importantly, the developer has not demonstrated that the site can be returned to prime agricultural condition at any cost. Once soils are compacted, graded, or disturbed by trenching and infrastructure, their structure and productivity cannot be fully restored. The decommissioning plan does not address this reality, nor does it include any agronomic assessment of what would be required to rehabilitate the soils. Because the decommissioning fund is unsupported, underestimated, and does not guarantee restoration of agricultural function, it fails to meet §248's requirement that the project not unduly interfere with the orderly development of the region or harm primary agricultural soils. A decommissioning estimate that does not reflect the true cost of restoring the land is effectively a cost shift onto the community and future landowners."

These concerns are very real for our town as this restoration would be very burdensome to our town years from now.

I reference *Exhibit TL-JB-13* below in the water quality section. It is important to make the same statements when discussing the impacts of PFAS on soil and with significant impacts to prime

agricultural soils. It is further important to state that this document discusses the burden on a community for when these contaminants happen down the road as it could be years before the real significant problems develop.

--Public health and safety, 30 VSA §248(b)(5)

Q.12 Do you have concerns about the impact of the proposed project on public health and safety in Lowell?

A.12 Yes. In addition to concerns regarding water quality as set out below and in testimony provided by Jeffrey Koch on behalf of the Town of Lowell and Lowell Graded School regarding the Lowell Graded School well source protection area, and residents regarding residential water lines, I am concerned about issues pertaining to fire and emergency responders.

When the Town inquired of the developer regarding training for emergency personnel who might respond to fires or other emergencies at their project with the following listed Questions and Responses, Mr. Hand responded that since we'd already had training regarding the substation, we didn't need training regarding the solar array. See, *Exhibit TL-JB-5*, Mr. Hand's discovery responses in relation.

However, Lowell fire department personnel have not had training regarding response at the substation. Please refer to Prefiled Testimony of Gerry Nick and *Exhibit TL-GN-1.* Moreover, we as the Town of Lowell are concerned that there are unique issues pertaining to the solar array, including access (the array will be fenced – how will emergency and fire personnel have access?), the ability to shut off electrical power flow when responding to an emergency, and the

issue of emergency responder lighting initiating power flows even at night, subjecting firefighters and responders to potential safety hazards. The Lowell Fire Department has recently submitted two letters that I am using as evidence in my testimony. The testimony by our Fire Chief Gerry Nick is a direct response to the questions and responses from Thomas Hand asked in Discovery. Please refer to Prefiled Testimony of Gerry Nick and *Exhibit TL-GN-1*. The Lowell Fire Department expresses their concerns about needing access to the solar array and a risk assessment plan which would require direct contact with the solar developer and anyone purchasing or owning the land in the future as well as specific training as solar arrays are very different from substations. There are also Radio interference concerns mentioned in this first letter that with more research Trip Wileman, a Lowell Fire Department Member was able to seek some initial information about the direct impacts the Northland Solar project would have on our volunteer fire department and first responders. This is crucial and pertinent information that requires responses from the developer before considering a CPG. Please refer to *Exhibit TL-GN-1 LVFD Solar Summary Attachment* for details and attached evidence that the Fire Department directly submitted to the Town of Lowell about these very negative impacts on our already burdened small rural town.

The Town is requesting that the CPG for this project be denied.

--Water quality under 30 VSA §248(b)(5) and 10 VSA §6086(a)(1)

Q.13 Do you have concerns about the water quality of surrounding wells, source protection areas and springs being impacted?

A.13 Yes

At this time the Town of Lowell would like to bring it to the attention of the PUC that there is a resident's spring that crosses the field to be used and we have established about where the pipe runs underground in reference to the Northland Solar project as stated in the *Exhibit TL-JB-15* who ran the line. It is still in use by Evan Brasseur's family as stated in *Exhibit TL-JB-16*. This family would need to have these pipes replaced if broken and are concerned about their water being impacted during the project.

Exhibit TL-GS-4 Regional Plan Page 178:

> *Groundwater*
>
> *Ground water is a critical resource for the rural areas of Vermont… According to the state Water Quality Division, in many rural communities nearly 100 percent of the public and private drinking water sources are from ground water.*

This statement is true for the Town of Lowell since all residents have private wells or springs. Yet as further stated *"However, toxic substances can stay with ground water for very long distances. Although groundwater quality is generally good, the resource is nonetheless fragile. Contaminated wells destroy property value."* With documented peer reviewed articles the findings are that solar panels create PFAS in the groundwater and those chemicals are considered forever as there has been no way as of yet to eliminate them. Lastly, it is clearly said *"One way to avoid costly groundwater contamination cleanup is to begin a Well Head Protection Program (WHPP). This is addressed in the Water Supply section of the Utilities and Facilities chapter of this document."* This is further reasoning and evidence that this very large solar array should not

be placed in an area completely surrounded by homes and on the Lowell Graded School Well Source Protection Area.

Water Supply Goals

Regional Plan Page 112: *Discourage development in Source Protection Areas, identified groundwater recharge areas, or other areas where water supplies are likely to be adversely impacted.*

The proposed Northland Solar project is located in part within the Source Protection Area for the Lowell Graded School Well System ID 6650, in contravention of the regional plan. The project creates concern regarding the protection of the school's sole drinking water source.

Jeffrey Koch, a local resident and Biology Adjunct professor, stated in his prefiled testimony the different harmful chemicals that could be leached over time into the soil and the water and what CDC has to say about said chemicals. This testimony heightens the Town's concern for the nearby wells such as the Lowell Graded School.

I teach about water quality as a science teacher. I read an article *Exhibit TL-JB-13* that was closer to home being written in New York. This article discusses PFAS and other compounds found in solar panels. I cannot specifically speak to the type of panels Thomas Hand will be using because even he does not know yet or so he states in his responses to discovery.

"According to the National Institute of Environmental Health Sciences, perfluoroalkyl and polyfluoroalkyl substances (PFAS) are toxic, persistent, and bioaccumulative." pg 2

"The Green Science Policy Institute details that these manmade chemicals are widely used in building materials such as paints, cleaning products, non-stick coatings, sealants, tapes, wire coverings, glass, solar panels, and batteries." pg 2

"These "forever chemicals" have been linked to cancer and other health issues. Certain PFAS do not break down easily, causing them to remain indefinitely in the soil and water. Their potential hazard and persistence in the environment may pose a cumulative danger to public health." pg 2

These 3 quotes explain what PFAS are and that solar panels create them and why they are a concern to our soil and water quality.

"Of particular concern is the use of PFAS in anti-reflective coatings (ARC) and anti-soil coatings (ASC) that are used to increase solar panel productivity. Material and Data Safety Sheets detail the contents of products manufactured in the United States. However, at this time, China is the major supplier of polysilicon24 solar panels and batteries. Accountability and transparency for materials and products made outside of the United States is questionable." pg 5

This causes the Town of Lowell to have grave concerns when thinking about the Lowell Graded School Drinking Water well. Especially the source protection area that is within proximity to the solar panels.

"The cumulative effect of tens of thousands of solar panels for 35 or more years would most likely permanently contaminate the site's groundwater, soil, and stormwater runoff. If coatings are reapplied during the projects lifetime then additional concerns are raised.

How is the ground protected during reapplication? How often is the coating reapplied to the panels on site? Improper disposal of broken and decommissioned solar panels may permanently contaminate landfills and any nearby aquifers." pg 8

This statement very clearly shows there would most likely be permanent contamination to both groundwater and soil.

"Renewable energy developers are responsible to their investors. Not the town. Not the neighbors. And not the environment. Solar projects are held by individual LLCs whose only asset may be an aging infrastructure built on leased ground. At time of decommissioning—or evidence of contaminants—it is unlikely that there will be a deep-pocketed corporation to bring the site into compliance with current or future EPA and DEC Standards." pg 10

This particular quote sums up why we the Town of Lowell argue about water quality and soil at all. We have no idea what solar products Mr. Hand will use which means we cannot intelligently argue if they will harm any of our Town residents' drinking water or prime agricultural soils making them large problems in the future when Thomas Hand is no longer the owner. The Town of Lowell and its residents will be left to clean up the problem that was described here would be very costly.

"When reviewing this Application, the Siting Board must not rely on good intentions. As has been noted throughout this proceeding, multiple solar projects will be constructed in the watershed of Sleepy Hollow Lake. Measures should be taken to determine that panels, electrical infrastructure, and wiring for these projects is PFAS-free. What we are discussing here is a matter of public health and safety, we encourage the Board to

require developers to provide specification sheets, and to describe preventive measures, testing policies, and Material and Data Safety Sheets…Preventative measures—not after-the-fact remediation—are the answer to avoiding PFAS contamination of soil, stormwater runoff, drinking water, and aquifers surrounding the project." pg 11

Ground water monitoring systems for the school and all homes adjoining the property should be installed, operated and regularly checked by the developer.

However, under these very real water quality concerns the CPG should be denied.

--General Good of the State

Q.14 Do you have any concerns in regards to the General Good of the State?

A.14 Yes specifically in regards to Disproportionate Burden and Environmental Justice Concerns.

Disproportionate Burden

I think it is very important to go back to David Snedeker's Supplemental Comments *Exhibit TL-JB-10* and reiterate *"In 2023, the Northeast Kingdom (NEK) generated approximately 1.76 million MWh of renewable electricity. Despite hosting only 8% of Vermont's population, the NEK already produces about one-third of the renewable electricity Vermont aspires to generate in-state by 2050. The NEK is not energy deficient. It is a clean-energy exporter region bearing a disproportionate share of Vermont's generation infrastructure relative to its population and load."*

This raises an important policy question:

When a region is already exporting substantial renewable energy and experiencing transmission congestion constraints (including within the Sheffield-Highgate Export Interface-SHEI), does additional utility-scale generation in non-preferred, rural locations meaningfully advance the State's planning goals — or does it further concentrate impacts in a region already carrying an outsized burden?"

Environmental Justice

The Town of Lowell is a vulnerable community as identified by David Snedeker and already generates enough power for 26,000 homes and the Northeast Kingdom of Vermont produces about ⅓ of the energy for the entire state while making up only 8% of the state population. Taking away important prime agricultural fields and wildlife that is the very foundation of our economics for tourism.

I as the Selectboard Chair implore you to consider the entire testimony and the many ways evidence has been provided to demonstrate on every level the many reasons the Northland Solar Project should be denied this location.

Q.15 Do you have other concerns about project impacts?

A.15 Not currently, as I am not aware of other concerns at this time but reserve the right to address any additional issues that come to light as more information develops.

Q.16 Does this complete your testimony?

A.16 Together with the attached Exhibits, yes.

AFFIDAVIT OF JENNIFER BLAY

1. I have provided pre-filed testimony and exhibits in the above-captioned matter.
2. I have personal knowledge of the information provided in my pre-filed testimony.
3. I am able to testify as to the validity of the information contained in my pre-filed testimony and exhibits.
4. I declare that the foregoing statements are true and accurate to the best of my knowledge and belief. 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 2170 VT Rte. 100, Lowell, Vermont this 27th day of MARCH 2026.

Jennifer Blay

Name: Jennifer Blay