STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 26-___-PET

Petition of Green Mountain Power for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the rebuild of the Georgia Substation located at 2066 Ballard Road in the Town of Georgia, Vermont	

DIRECT TESTIMONY OF WITNESS
ADAM CRARY
ON BEHALF OF GREEN MOUNTAIN POWER

April 8, 2026

In his testimony Mr. Crary discusses the potential environmental and land-use impacts of the Project and the associated criteria under 30 V.S.A. § 248.

EXHIBIT LIST

Exhibit GMP-AC-1	Resume of Adam Crary
Exhibit GMP-AC-2	Section 248 Natural Resources Assessment memorandum
Exhibit GMP-AC-3	Summary of Archaeology Studies memorandum
Exhibit GMP-AC-4	Section 248 Sound Assessment memorandum
Exhibit GMP-AC-5	Aesthetics Assessment

DIRECT TESTIMONY OF ADAM CRARY

1. Q. Please state your name, occupation, and business address.

A. My name is Adam Crary, I am employed at Vanasse Hangen Brustlin, Inc. (VHB), and my business address is 20 Winooski Falls Way, Suite 400B, Winooski, Vermont. I am a practicing senior ecologist currently serving as VHB's Regulatory Team Leader, Renewables in Vermont.

2. Q. Please describe your background and experience.

A. I have a B.S. in Natural Resources (Natural History and Ecology concentration) from the University of Maine in 2000. I have been a Senior Ecologist and then Director of Natural Sciences at VHB since 2009, where I am responsible in part for managing projects, technical staff, and technical work to conduct various ecological surveys and reporting, typically under the requirements of federal, state, and local environmental regulatory programs. I also manage and coordinate the work of various other VHB services (historical, visual, sound, civil, survey, etc.) with a particular focus on energy-related projects. I have been a professional environmental consultant since 2001, specializing in natural resources identification and assessments and integrated services delivery. In addition to assessments conducted for numerous projects under 30 V.S.A. Section 248(b)(5) review, I have prepared and coordinated applications for the acquisition of numerous federal and state environmental impact permits, which involve application of expert ecological and natural resource assessment disciplines. My resume is attached as **Exhibit GMP-AC-1**.

3. Q. Have you previously testified before the Vermont Public Utility Commission ("Commission")?

A. I have testified (through prefiled testimony and/or live hearings) for numerous projects located across Vermont, particularly those related to electric infrastructure upgrades or replacement, or new energy generation and storage, particularly renewables. I have also provided technical support to expert witnesses providing testimony for other projects under Commission review, including utility-scale projects, a sample of which are listed on my resume.

4. Q. What is the purpose of your testimony in this case?

A. My testimony will discuss the relationship of the proposed upgrades at the GMP Georgia Substation, located at 2066 Ballard Road in the Town of Georgia, Vermont (the "Project"), to the orderly development of the region and its possible effects on aesthetics, historic sites, air and water purity, the natural environment, and the public health and safety. My understanding of the Project comes from design planning coordination with GMP project management, GMP's design engineer, and from my review of GMP testimony describing this Project.

5. Q. Please summarize your testimony.

A. My testimony involves the potential land-use and environmental impacts of the Project. Specifically, I conclude that the Project will:

- Not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the municipal and regional planning commissions, the recommendations of the municipal legislative

bodies and the land conservation measures contained in the plan of any affected municipality as required under 30 V.S.A. § 248(b)(1);

- Not have an undue adverse effect on aesthetics, historic sites, air and water purity, the natural environment, and the public health and safety, with due consideration having been given to the criteria specified in 10 V.S.A. § 1424a(d) and § 6086(a)(1) through (8) and (9)(K) as required under 30 V.S.A. § 248(b)(5); and
- Not involve a facility affecting or located on any segment of the waters of the state that has been designated as outstanding resource waters by the Secretary of Natural Resources consistent with the policy set forth in 30 V.S.A. § 248(b)(8).

6. Q. Will construction of the Project interfere with the orderly development of the region, giving due consideration to recommendations from municipal and regional planning commissions and municipal legislative bodies, and land conservation measures included in the municipal plan (30 V.S.A. § 248(b)(1))?

A. No. The Project involves substation equipment upgrades needed to improve system reliability and safety of electricity service provided for customers in the towns of Georgia and Milton. The substation is in Georgia, and the Town of Georgia, Vermont 2024 Town Plan ("Town Plan") suggests that public utilities (in which I include electric substations) should be enhanced to improve economic development and quality of life without jeopardizing public health, the environment, or scenic resources. It further suggests that utilities should be located in appropriate areas respecting the integrity of residential areas, aesthetic concerns, and natural resources issues.

GMP hired VHB to perform an inventory of natural resource features in the Project area, and assess the Project as designed for potential impacts. VHB also assessed potential noise-related impacts of the facility, and T.J. Boyle Associates ("TJBA") assessed potential aesthetic

impacts from the substation upgrades; each assessment resulted in findings that the Project as proposed will not have undue adverse impacts. GMP also hired Northeast Archaeological Research Center ("NEARC") to assess potential impacts on below-ground historic cultural resources, and VHB has reviewed above-ground historic sites. As described in greater detail below, the Project as designed will avoid and minimize impacts to natural and cultural resources. The purpose of the Project meets the intent of the Town Plan, and the siting of the Project raises no issues or conflict with the Town Plan's three criteria for utilities. Excerpts from the Town Plan regarding these criteria are included in **Exhibit GMP-AC-5** (TJBA Aesthetics Report), Appendix E.

Although the Northwest Regional Planning Commission's ("NRPC") 2024 regional energy plan does not specifically mention substation rebuilds, the purpose of that plan is to lay out goals that support progress toward Vermont's statewide energy goals. The purpose of this Project, specifically the rebuild and modernization of the existing substation in its current footprint, meets that intent by improving the electric infrastructure in this region of Vermont. Excerpts from the intent of the Regional Plan are also included in Exhibit GMP-AC-5, Appendix E.

7. Q. Has GMP received any substantive comments from the municipal or regional commissions related to the criteria of 30 V.S.A. § 248(b)? And if so, how has GMP addressed them?

A. I am not aware that GMP has received any substantive written comments from either the Town of Georgia or the NRPC. As detailed further by GMP witness Kamran Hassan,

a GMP representative attended the NRPC's March 11, 2026 meeting where the Project was discussed.

8. Q. 30 V.S.A. § 248(b)(5) - Will construction have any undue adverse impacts on aesthetics, historic sites, air and water purity, the natural environment, use of natural resources, or public health and safety? More specifically, please address criteria listed in 10 V.S.A. §§ 1424(d) and 6086(a)(1) through (8) and 9(K), impacts to primary agricultural soils, and greenhouse gas impacts, as numbered sequentially below.

A. No. GMP hired VHB to perform an inventory of natural resource features in the Project area, and assess the Project as designed for potential impacts. VHB also assessed potential noise-related impacts of the facility and TJBA assessed potential aesthetic impacts from the substation upgrades. GMP hired NEARC to assess potential impacts on below ground historic cultural resources, and VHB has reviewed the Project for impacts on above-ground historic sites. The Project as designed will avoid and minimize impacts to environmental and cultural resources as described below and in **Exhibits GMP-AC-2** (VHB Natural Resources Memo); **GMP-AC-3** (VHB Archaeology Summary of NEARC Studies Memo); **GMP-AC-4** (VHB Sound Memo), and GMP-AC-5 (TJBA Aesthetics Report).

9. Q. 10 V.S.A. § 6086(a)(1) – Pollution: Will any Project components result in undue water or air pollution?

A. No. With respect to air pollution, any dust from construction activities will be suppressed in accordance with the Vermont Department of Environmental Conservation

("DEC") Standards and Specifications for Erosion Prevention and Sediment Control. The Project does not involve any burning.

As depicted on Exhibit GMP-JRF-9, the substation upgrades include installation of an oil containment berm for all oil-filled equipment at the facility. Along with GMP's existing substation monitoring systems and comprehensive spill reporting/response program, this upgrade will further enhance containment of potential releases of oil from substation equipment into underlying soils and groundwater. Failures of substation equipment that may result in releases of dielectric fluid are immediately detected, investigated, and remediated by GMP, and routine monthly inspections include condition assessments of oil-filled equipment, along with identification and remediation of any small leaks not resulting in detectable equipment failure. The facility has been designed to hold any significant volume of leaked or spilled oil within the fenced yard, with the capacity to contain the entire volume of oil from all on-site equipment. The contours of the bermed yard prevent liquids from flowing out of the facility, and the engineered drainage system includes containment structures that block the flow of petroleum-based liquids while allowing the flow of water out of the yard. Mineral oil dielectric fluid spills are remediated through removal of impacted stone and soil, along with simple soap-and-water washing of impacted solid surfaces.

The Project requires a spill prevention control and countermeasure ("SPCC") plan due to the volume contained in the oil-filled equipment needed to operate the substation. The purpose of the SPCC Plan is to minimize the chances that a spill of oil or hazardous material onsite will occur; and, to prepare for a proper response in case a spill was to occur. GMP will update its SPCC plan with the required site-specific information for the rebuilt Georgia Substation within

six months following the commencement of operation.

As described in the water-related criteria in more detail below, the Project has been designed to avoid or minimize impacts to soils and water resources and runoff that could cause water pollution.

10. Q. Will the Project result in undue noise?

A. No. GMP hired VHB to assess potential noise impacts from the upgraded facility. VHB's modeling concludes that the maximum predicted sound levels of the proposed Project will be approximately 15.9 dBA at the closest residential building, which is a contribution less than the sound level limit of 40 dBA used as the sound level limit for the Project. The Project sound levels are greater than 10 dBA below the ambient sound levels at the closest residence, and therefore, the Project as proposed will not result in undue noise. See Exhibit GMP-AC-4.

11. Q. 10 V.S.A. § 6086(a)(1)(A) – Headwaters: Is the Project located on lands located in headwaters of watersheds; drainage area of 20 square miles or less; above 1,500 foot elevation; watersheds of public water supplies; or areas supplying significant recharge waters to aquifers?

A. No. As described in Exhibit GMP-AC-2, the Project is not located in a headwaters area. Though the Project area technically does meet subcategory (ii) of the headwaters criteria with a drainage area of less than twenty square miles, it occurs within the much larger St. Albans Bay-Lake Champlain watershed, and the remaining subcategories of the criterion related to elevation, slope, water protection and ground water recharge are not met. Given the physical

characteristics of the Project area as they relate to headwater subcategories, and the Project's location in the Lake Champlain watershed, it is not located in a Headwaters area. Regardless, the Project will comply with all applicable regulations regarding the protection of ground and surface water, as described in Exhibit GMP-AC-2, at 3-4.

12. Q. 10 V.S.A. § 6086(a)(1)(B) – Waste Disposal: Will the Project be in compliance with applicable regulations regarding the disposal of wastes?

A. Yes. The Project's plans for waste disposal, specifically as it relates to sanitary waste, solid waste, woody debris, as well as stormwater runoff is described here, along with a description of any known contamination at the site. The Project operation will not generate sanitary waste nor create more than one-half acre of impervious surface (about 8,600 square feet or 0.20-acre), or more than three acres in combination with existing impervious surfaces and will not require an operational stormwater permit for operational phase stormwater discharges from the Vermont Department of Environmental Conservation ("DEC").

Project construction waste would include the equipment from the deconstructed substation and the poles/conductor material removed as part of the transmission and distribution line work. Retired materials and other construction waste, such as existing oil-filled operational equipment, existing substation structures and concrete pads/foundations, removed wooden poles, fiber and electric conductor line material will be disposed of or recycled as appropriate and in accordance with all applicable regulations.

GMP hired VHB to assess the existing substation soils for potential contamination, including collection and analysis of soil samples. Due to accessibility limitations, concrete

supporting the transformer was not sampled, but VHB recommends visual inspections for staining prior to disposal. There are no underlying soils that were found to exceed DEC soil standards. The Project's waste concrete will be visually inspected and disposed of in accordance with DEC's 2019 policy on concrete disposal. The Project will generate waste soil, particularly from access road upgrades and construction, which does not require DEC's Division of Waste Management regulation. GMP will coordinate with VHB regarding the appropriate offsite location for disposal of this waste soil.

Woody debris generated from the Project will be disposed by the contractor at an approved disposal facility. Stumps grubbed from the site will be chipped onsite prior to hauling to a landfill or other approved disposal facility, or by a licensed hauler to transport solid waste.

13. Q. 10 V.S.A. § 6086(a)(1)(C) – Water Conservation: Will the Project require any significant use of water?

A. No. The Project will not utilize water during operation. The Petitioner's contractor may use an insignificant quantity of water for the cleaning of equipment and for potential dust control during construction, if necessary.

14. Q. 10 V.S.A. § 6086(a)(1)(D) – Floodways: Is the Project located in a floodway?

A. No. The Project is not located within a Floodway, Floodway Fringe, or mapped River Corridor, all of which are reviewed under this criterion. See Exhibit GMP-AC-2, Attachment 2.

15. Q. 10 V.S.A. § 6086(a)(1)(E) – Streams: Will the Project maintain the natural condition of streams?

A. Yes. As described in GMP-AC-2, at 4, there are no streams that occur within the natural resources study area, and the Project therefore does not involve any work within streams. There is an intermittent stream system located beyond the Project property to the south, that was delineated by VHB as part of a separate project and is an unnamed tributary to Stone Bridge Brook. This stream, located approximately 250-feet south from the rebuilt substation, is afforded a 50-foot riparian buffer, including from its riparian wetlands, which do occur within the Project property and are shown as wetland buffer on Project plans (Exh. GMP-JRF-3). According to calculations provided by GMP, the Project involves minor grading and tree clearing (approximately 360 square feet) along the outer fringe of the buffer in one location in order to accommodate the expanded substation, which is minimized by utilizing the existing substation footprint and angling the grading on that corner of the yard. The impacts are minor and will not result in a change in riparian buffer condition or function that would impact the natural condition of the offsite stream.

The Project also involves upgrades to a segment of overhead distribution line from Ballard Road to the rebuilt substation. This upgrade will not involve new poles in the riparian buffer nor new tree clearing beyond normal maintenance for the existing overhead line, which is conducted by GMP in accordance with its integrated vegetation management plan.

The Project will involve approximately 1,570 square feet of tree clearing (no stump grubbing) in the riparian buffer for improving access road site visibility between the driveway and the overhead distribution line. As noted above, this work is on the outer fringe of the buffer,

is a minor area, and will not impact the buffer's function to protect the riparian wetland and offsite stream.

16. Q. 10 V.S.A. § 6086(a)(1)(F) – Shorelines: Is the Project located on a Shoreline?

A. No. The Project is not located on a Shoreline. See Exhibit GMP-AC-2, Attachment 2.

17. Q. 10 V.S.A. § 6086(a)(1)(G) – Wetlands: Is the Project in compliance with the rules of the Secretary of Natural Resources relating to significant wetlands?

A. Yes. As described in more detail in Exhibit GMP-AC-2, at 4-5, VHB delineated one Class II wetland area within the Project's natural resources study area, which would have a 50-foot buffer and is regulated under the Secretary's Vermont Wetland Rules ("VWR"). The ANR-DEC wetland program (Brock Freyer) field-reviewed and confirmed a portion of this wetland complex as part of review of the adjacent battery energy storage project on September 11, 2020. VHB's delineation in 2023 for this Project's Study Area is an extension of the complex's delineation, it is topographically defined wetland, and another site visit should not be necessary, but can be accommodated if the ANR requests another visit. The Project's substation design has been configured to avoid activities within Class II wetlands and buffers with exception of the minor grading and tree clearing necessary to expand the southwest corner of the substation. Project work in this area will involve approximately 360 square feet of wetland buffer impact, and requirements to be permitted under the VWR. As noted above, there will also be approximately 1,570-sf of tree clearing in wetland buffer and 150-sf in wetland to improve the

site access visibility. Access and work required to upgrade the segment of existing overhead distribution line within this wetland and buffer (including some danger tree removals) will be completed in accordance with best management practices pursuant to VWR Allowed Use 6.8, and GMP's integrated vegetation management protocols. Therefore, the Project will require a permit pursuant to the VWR. VHB expects this Project to qualify for the Vermont Wetland General Permit 3-9025 and with permit coverage, it will comply with the VWRs and not create an adverse effect on significant or non-significant wetlands.

18. Q. 10 V.S.A. § 6086(a)(2) – Sufficient Water Availability: Is there sufficient water available for the needs of the Project?

A. Yes. Operation of the substation facility will not involve the use of water.

19. Q. 10 V.S.A. § 6086(a)(3) – Existing Water Supply: Will the Project cause an unreasonable burden on an existing water supply?

A. No. The Project will not require a permanent water supply.

20. Q. 10 V.S.A. § 6086(a)(4) – Erosion: Will the Project cause unreasonable soil erosion or reduction in the capacity of the land to hold water?

A. No. The Project will involve less than one acre of earth disturbance (approximately 41,900 sf or 0.96-acre) and will therefore not require authorization under DEC's construction stormwater permit 3-9020. GMP will ensure that Project construction is performed in accordance with DEC's Low Risk Site Handbook for Erosion and Sediment Control in

Vermont. The Project is a rebuild on an existing substation site and there will not be any significant change in the landform and runoff characteristics, and the design is in accordance with applicable Vermont construction stormwater discharge regulatory parameters, so there will not be unreasonable erosion or reduction in the land's water holding capacity. See Exhibit GMP-JRF-3 as well as the elevation views in Exhibits GMP-JRF-5 through 8.

21. Q. 10 V.S.A. § 6086(a)(5) – Transportation: Will the Project cause unreasonable congestion or unsafe conditions with respect to use of the highways, waterways, railways, airports or airways, and other means of transportation existing or proposed?

A. No. Access to the Project site from Ballard Road will be unchanged. When construction is complete, trips to the facility will be infrequent, consisting of routine inspections and planned or necessary maintenance.

22. Q. 10 V.S.A. § 6086(a)(6) – Education: Will the Project cause an unreasonable burden on the ability of any municipality to provide educational services?

A. No. The Project will not require any educational services.

23. Q. 10 V.S.A. § 6086(a)(7) – Government: Will the Project place an unreasonable burden on the ability of local governments to provide municipal or governmental services?

A. No. The Project will not create the need for any additional municipal or governmental services.

24. Q. 10 V.S.A. § 6086(a)(8) – Aesthetics: Will the Project components have an undue adverse effect on the scenic or natural beauty of the area, or aesthetics?

A. No. GMP hired TJBA to assess potential impacts of the Project on aesthetics and natural beauty. In its resulting report, Senior Landscape Architect Jeremy Owens concluded that the Project will result in a adverse visual impact, that will not be undue. Mr. Owens concluded that the Project will not violate any clear, written community standards; that GMP has proposed reasonable mitigation including reuse of an existing facility and implementation of a landscape mitigation plan consisting of mainly evergreen plantings; that the Project will not be shocking or offensive; and that any adverse impacts associated with the Project will not be undue. See Exhibit GMP-AC-5. The proposed landscape mitigation plan is Appendix C to Exhibit GMP-AC-5.

25. Q. 10 V.S.A. § 6086(a)(8) – Historic Sites: Will the Project have an undue adverse effect on historic sites?

A. No. With respect to above-ground historic sites, from review of available records and the proposed Project by VHB's Director of Cultural Resources, Vermont and senior historian Britta Tonn, there are two state-register listed above-ground historic sites within the indirect Area of Potential Effects ("APE") for the Project: the Ballard Farm (#0608-27) at 1900 Ballard Road adjacent to the south of the Project parcel, and the house at 2382 Ballard Road (#0608-28) located north of the Project parcel. No direct effects to either will occur. Potential indirect effects of the Project on both properties are included in the Project's aesthetic assessment (Exhibit GMP-AC-5). Based on TJBA's review of the Projects viewshed and aesthetic impacts, due to

the retention of existing vegetation, there will be no potential impacts to the listed historic properties to the south. There would be views of the proposed Project to the listed property to the north due to the proposed vegetation removal north of the substation, which will be mitigated by the replacement evergreen screening. The TJBA report in Exhibit GMP-AC-5 includes more details on Project views and screening, as well as a review of the proposed substation upgrade height, which will not be significantly higher than the existing substation (see the Cross Sections in Appendix D of GMP-AC-5). From this, Britta Tonn reviewed the TJBA aesthetic assessment and concludes that there will be no undue adverse effect on above-ground historic sites within the APE. As such, the Project will not result in an adverse effect on above-ground historic sites.

With respect to below-ground cultural (archaeological) resources, GMP hired NEARC to assess the Project area for potential archaeological resources. NEARC performed an Archaeological Resource Assessment ("ARA") for the Project Area, which identified areas within the Project that would be considered Archaeologically Sensitive Area ("ASA") and warrant further study. NEARC then completed a subsequent Phase I investigation of the ASA within the Project area, including a follow up review of the results against a revised site plan version. NEARC's Phase I study did not find any archaeological sites and concluded that the Project will not have any adverse effect on below-ground historic sites. See Exhibit GMP-AC-3 for a compiled summary of NEARC's studies and subsequent reports.

26. Q. 10 V.S.A. § 6086(a)(8) – Will the Project have an undue adverse effect on rare and irreplaceable natural areas?

A. No. There are no known significant natural communities at the Project site, and VHB confirmed through the natural resources field studies that the Study Area does not contain any areas that could be. Therefore, there are no rare or irreplaceable natural areas associated with the Project. See Exhibit GMP-AC-2, Attachment 2.

27. Q. 10 V.S.A. § 6086(a)(8)(A) – Wildlife and Endangered Species: Will the Project destroy or significantly imperil necessary wildlife habitat or any endangered species?

A. No. As described in Exhibit GMP-AC-2, at 5-6, from database and field review, there are no areas that VHB would consider necessary wildlife habitat within the Study Area. There are also no known threatened or endangered species within the Study Area. The Project is located within the known range of the federal and state-protected northern long-eared bat and the federal proposed threatened monarch butterfly. There are no documented occurrences of this bat within one mile of the Study Area, and the Project will involve only 0.16-acre of tree clearing due to the Project. Therefore, no additional conservation measures are required. There are no proposed critical habitats for monarch butterfly, and the Project will not result in any large-scale habitat or land use change that would warrant any further conservation measures.

There is one 30-year old record of a state protected bird (upland sandpiper) mapped nearly 1-mile away from the Project, but given the unsuitable field and edge characteristics at the Project site, the existing infrastructure and activity in the Project vicinity, and the availability of

more suitable grassland habitat elsewhere, the Project will not impact this species, even in the unlikely scenario individuals still inhabit the area. See Exhibit GMP-AC-2, at 4-5.

VHB performed a database review of known rare, threatened or endangered ("RTE") species from which no plants are known in the Project's 1-mile vicinity and there are also no unique habitats onsite, suggesting that detailed RTE plant surveys are not warranted. However, VHB did collect a list of plants in the Study Area and no threatened or endangered species, or otherwise rare species were documented.

28. Q. 10 V.S.A. § 6086(9)(k) – Public Investments: Will the Project unnecessarily or unreasonably endanger any public or quasi-public investment in the facility, service, or lands, or materially jeopardize or interfere with the function, efficiency, or safety of, or the public's use or enjoyment of or access to the facility, service, or lands?

A. No. The access from the town's Ballard Road will be in the same location. However, it will be widened, including removal of some roadside vegetation, both of which will improve safe access to and from Ballard Road.

29. Q. 30 V.S.A. § 248(b)(5) - Will there be any significant Project impacts related to the use of natural resources or greenhouse gases?

A. No. The Project will not utilize natural resources beyond those required as elemental construction materials. The Project does not involve the use of any equipment containing sulfur hexafluoride gas and the substation operation will not emit greenhouse gases. Emissions from construction vehicles will be small in scale and temporary.

30. Q. 30 V.S.A. § 248(b)(5) - Will the Project affect any "primary agricultural soils" as defined by 10 V.S.A. § 6001?

A. Yes. All of the mapped soils underlying the Project site are considered Primary agricultural soil (PAS). As depicted on Attachment 8 of GMP-AC-2, there are 0.44-acre of PAS within the Project Study Area that are already impacted. Of non-impacted PAS, 0.37-acre would be permanently impacted by construction of permanent elements of the rebuild, including access and substation footprint. Also of the non-impacted PAS, the Project will involve temporary impacts that will be restored to pre-construction condition, including the footprint of the temporary substation area, where 6" topsoil will be stripped to install a ground grid and gravel surface, stockpiled, then replaced when the ground grid and gravel are removed to maintain agricultural farming potential of the soils. The Project's impacts to PAS are considered *de minimis* and do not require compensatory mitigation per AAFM procedure. See Exhibit GMP-AC-2, Attachment 8.

31. Q. Could you discuss the Project's impacts relative to Outstanding Resource Waters, 10 V.S.A. § 1424a(d), 30 V.S.A. § 248(b)(8)?

A. The Project is not located on or near any Outstanding Resource Waters. See Exhibit GMP-AC-2, Attachment 2.

32. Q. Does this conclude your testimony?

A. Yes.

DECLARATION OF ADAM CRARY

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

04/08/26
Date

/s/ Adam Crary
Adam Crary
VHB