

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

21-3587-NMP

Petition of Norwich Upper Loveland Road Solar LLC For a certificate of public good pursuant to 30 V.S.A. §§ 248 and 810, authorizing installation And operation of a 500 kW (AC) photovoltaic Group net-metering system in Norwich, Vermont	
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**PREFILED TESTIMONY OF JENNIFER GOULET ON BEHALF OF
STEVE GORMAN; JAY & HEATHER BENSON; JOY KENSETH;
JENNIFER & DANIEL GOULET; SAMIN KIM & JAYOUNG JOO;
LARRY UFFORD**

December 1, 2022

Ms. Goulet's testimony addresses statutory criteria 30 V.S.A. §248(b)(5)); (aesthetics, historic sites, air and water purity, the natural environment, use of natural resources, and public health and safety, 10 V.S.A. §6086(a)(1) (noise, air & water purity and greenhouse gas impacts), 10 V.S.A. §6086(a)(1)(A)(headwaters), (10 V.S.A. §6086(a)(1)(E) (streams), 10 V.S.A. §6086(a)(1)(G) (wetlands), 10V.S.A. §6086(a)(8)(A) (necessary wildlife habitat and endangered species), and introduces natural resources information that was overlooked or misidentified in the Arrowwood Environmental report Exhibit NUL DB-2.

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EXHIBITS

Exhibit NN-JG-1 Curriculum Vitae of Jennifer Goulet

Exhibit NN-JG-2 Environmental Impacts Report

1. Introduction

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

2 A1. My name is Jennifer Goulet. I am a self-employed small business owner. My business address is
3 185 Upper Loveland Road in Norwich, Vermont.

4
5 Q2. Please describe your professional background, qualifications and experience.

6 A2. A copy of my curriculum vitae is included as Exhibit NN-JG-1.

7
8 Q3. What is the purpose of your testimony?

9 A3. My testimony concerns the application of the Norwich Upper Loveland Solar LLC to construct
10 and operate a 500 kW ground mounted, photovoltaic solar array (“the proposed project”) in
11 Norwich, Vermont. My purpose is to correct inaccuracies and erroneous conclusions presented in
12 the Natural Resources Assessment Report prepared by Arrowwood Environmental (“AE”) and
13 submitted to the PUC on August 30 as Exhibit NUL-DB-2. This report was prepared based on my
14 own field work and observations of neighbors and local hunters. The first section describes natural
15 resources in the project area that were overlooked in the AE report. These include surface waters,
16 necessary wildlife habitat, and endangered species. The second section describes impacts that the
17 proposed project would have on on certain environmental criteria incorporated by reference under
18 30 V.S.A. §248(b)(5)); specifically, headwaters (10 V.S.A. §6086(a)(1)(A)), streams (10 V.S.A.
19 §6086(a)(1)(E)), wetlands (10 V.S.A. §6086(a)(1)(G)), necessary wildlife habitat and endangered
20 species (10V.S.A. §6086(a)(8)(A)).

2. Summary of Natural Resource Findings

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25 Q4. In your opinion, will the proposed project result in an undue, adverse impact upon the statutory
26 criteria you evaluated under 30 V.S.A. §248(b)(5))?
27

28 A4. Yes. I assessed the potential effects of the proposed project on the natural environment
29 according to the above mentioned criteria and scientific literature. As part of my review, site
30 investigations
31 were conducted in January and March of 2022. Lindsey Putnum, director of the Learning
32 Environment Education Program at Marion Cross School, shared a photo and field observations.
33 The report also reviews data provided by the Vermont Center for Geographic Information (VCGI
34 2022).

35
36 With regard to water resources, the AE report misidentified the location of the headwaters of the
37 small watershed in which the proposed project would be located. A second channel that drains the
38 project area was overlooked entirely. This report provides a map of the actual headwater stream
39 and surface waters in the project area. Evidence of physical hydrologic connections between these
40 channels and mapped downstream waters is presented. The downstream waters include a wetland,
41 two ponds, the Connecticut River and a stream designated “Highest Priority Surface Waters and
42 Riparian Areas” by the Vermont Agency of Natural Resources (“ANR”). By filling and building
43 upon two stream channels, the proposed project would create a flooding hazard with the potential
44 to wash out Upper Loveland Road. Clearcutting the forest and filling the only channel that drains
45 the steeply sloped project basin will also cause runoff and erosion. Potential effects on downstream
46 waters are described.

47
48 In addition, the report provides evidence that the proposed project would have an undue, adverse
49 impact on Jefferson salamanders (rare S2) and their habitat, bear habitat, and a white-tailed deer
50 wintering area. It also documents the impact of clearcutting the red oak and beech that grow in the
51 project area with regard to mast produced for wildlife and the carbon footprint of the proposed
52 solar array.

53

54 **3. Conclusion**

55 Q5. Does this conclude your testimony?

56

57 A5. Yes.