

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No. 21-3587-NMP

Petition of Norwich Upper Loveland Solar, LLC, for a certificate of public good, pursuant to 30 V.S.A. §§ 248 and 8010, authorizing the installation and operation of a 500 kW (AC) group net-metering solar electric generation system in Norwich, Vermont

PREFILED DIRECT TESTIMONY OF
LUCY THAYER
ON BEHALF OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE

December 1, 2022

1 **Q1. Please state your name, occupation, and affiliation.**

2 A1. My name is Lucy Thayer. I am a professional Landscape Architect at TCE (Trudell
3 Consulting Engineers). TCE has two office locations, one in Williston and the other in
4 Saint Albans Vermont; I work out of the Williston office. My business address is 478
5 Blair Park Road, Williston, Vermont 05495.

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

7 A2. The purpose of my testimony is to present the findings of my review of the proposed
8 500 kW solar generation facility on Upper Loveland Road, in Norwich, Vermont (the
9 “Project”), and its impacts to the aesthetics and scenic beauty to the surrounding area
10 and the orderly development of the region as a result of the proposed Project.

11 **Q3. Have you ever testified before the Commission?**

12 A3. Yes. I have testified before the Public Utility Commission (PUC) previously for a
13 number of projects, see my resume, Exhibit PSD-LT-1 for a partial list.

14 **Q4. Are you the preparer of Exhibit PSD-LT-2-?**

15 A4. Yes, I am.

16 **Q5. Please summarize Exhibit PSD-LT-2.**

17 A5. The Report presents findings and conclusions of my investigation as to whether
18 alterations to the proposed project area’s visual character are adverse, and if so, whether
19 the changes are unduly adverse as defined by the Quechee Analysis. Additionally, I
20 reviewed the most recent version of the Norwich Town Plan and Regional Plan by the
21 Two Rivers-Ottauquechee Regional Commission (“TRORC”) to understand the
22 Project’s impacts on the Orderly Development of the region. Appendices to the Report,
23 including a photo inventory from my site visit, viewshed map, excerpts of the Norwich

1 Town Plan, and excerpts of the Norwich Zoning Regulations, are provided as exhibits
2 PSD-LT-3 through PSD-LT-6 respectively. Project documents submitted by Norwich
3 Upper Loveland Solar, LLC (the “Petitioner” or “Applicant”), as record for PUC Case
4 No. 21-3587-NMP were analyzed and reviewed.

5 As documented fully in my Report, I found the Project will not have an adverse
6 impact on the visual resources or natural beauty of the area. The Project location is not
7 out of character with its surroundings - it is adjacent to a cellular communications tower
8 and a large, 150-foot wide cleared transmission corridor. The Project proposes to use
9 existing access roads and utility infrastructure to reduce new impacts to the site. The
10 Project does propose ±8.2 acres of clearing, however trees along the adjacent slope to
11 the east that will continue to screen the Project from view and tree clearing is not
12 prohibited. No grading is proposed that would alter the landform and/or greater visual
13 landscape. No adverse impact on open space will result from the Project.

14 There is not expected to be Project visibility because of several factors that most
15 notably include intervening topography and vegetation. The Project is located above/at
16 a higher elevation than the nearby area roads so that views of or from the surrounding
17 area will not be adversely impacted.

18 This conclusion is also based on the town and regional plans where I found no
19 indications that the Project or its surroundings have any identified scenic resources in
20 the area or that the Project will have any effect on scenic resources, include the village
21 area and Route 5 which is part of a recognized scenic byway.

22 Based on my review of the Town and Region Plans with regard to orderly
23 development of the region, I found that the Project does not violate any clear, written

1 standards. While the Project location is part of the Ridgeline District, it meets the
2 development criteria in the Town Plan and Town Zoning Regulations. The site is not
3 identified as a mapped forest block, cultural, historic, or scenic resource. The town and
4 regional plans speak generally to the goal of concentrating growth in designated centers
5 and village growth areas, with sensitivity to environmental and aesthetic impacts. The
6 specifics of the Project are such that it does not create impacts to or otherwise require
7 the extension of new infrastructure (municipal roads, water, sewer), does not increase
8 population or place burdens on the local community, and does not impact areas
9 designated for conservation or agricultural use. Based on my review of these plans, I
10 do not believe the Project will interfere with these objectives or the orderly
11 development of the area as outlined in the Town and Regional Plans.

12 Together through a joint letter, the Town Planning Commission and Selectboard,
13 and the Regional Planning Commission, have confirmed the designation of the Project
14 site as a 'preferred site' per PUC Rule 5.100. The preferred site letter can be found in
15 the Petitioner's filing in Exhibit NUL MS-5.

16 **Q6. Does this conclude your testimony?**

17 A6. Yes, it does.