

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-

Petition of Vermont Transco LLC and Vermont Electric Power Company, Inc. (“VELCO”) for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, for approval to install an Advanced Power Flow Controller at the VELCO Sandbar Station in Milton, Vermont	
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PREFILED TESTIMONY OF WITNESS
JACOB REED
ON BEHALF OF VELCO

June 30, 2025

Jacob Reed’s testimony demonstrates that this Project will not have an undue adverse effect on historic sites, air and water purity, or the natural environment as described under 30 V.S.A. §§ 248(b)(5) & (b)(8).

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EXHIBITS

Exhibit Petitioner JTR-1	Résumé of Jacob T. Reed
Exhibit Petitioner JTR-2	Cultural Resources Review
Exhibit Petitioner JTR-3	Natural Resource Memorandum with Attachments
Exhibit Petitioner JTR-4	NNIS Monitoring and Control Plan
Exhibit Petitioner JTR-5	VELCO Environmental Guidance Manual (VEGM)

PREFILED TESTIMONY OF JACOB T. REED
ON BEHALF OF VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC

Introduction

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

3 **A1.** My name is Jacob T. Reed. I serve as Senior Environmental Specialist for
4 Vermont Electric Power Company, Inc. and Vermont Transco LLC (together “VELCO”) My
5 business address is 366 Pinnacle Ridge, Rutland, Vermont.

6
7 **Q2. Please describe your education and employment background.**

8 **A2.** I received a Bachelor of Science degree in Architectural Engineering Technology
9 from Vermont Technical College, and a Master of Science in Environmental Studies and
10 Sustainability from Unity College. I have been employed full-time by VELCO since November
11 2012. I have worked on a variety of environmental projects at VELCO. In my current role as
12 Environmental Permitting Lead for the Sandbar Project, I am responsible for scheduling and
13 managing any necessary natural resource and above- and below-ground historic site assessments;
14 agency coordination and correspondence, environmental permitting, and construction and
15 restoration oversight to ensure compliance with the Project’s environmental permits and
16 commitments.

17 My resume is attached as **Exhibit Petitioner JTR-1**.

1 **Q3. Do you hold any professional licenses or certifications?**

2 **A3.** Yes. I am a Certified Professional in Erosion and Sediment Control (CPESC
3 #7669), I am a Certified Erosion, Sediment and Stormwater Inspector (CESSWI- #12719). I also
4 hold OSHA 40-hour certification for Hazardous Waste Operations and Emergency Response
5 (HAZWOPER) (29 CFR 1910.120).

6

7 **Q4. Have you previously provided testimony before the Vermont Public Utility**
8 **Commission (the “Commission” or “PUC”)?**

9 **A4.** Yes. I offered testimony at the PUC in support of VELCO’s Windsor Substation
10 Project in case 24-3717-PET, Middlebury Substation Project in Case 23-0132-PET, VELCO’s
11 Florence Substation Project in Case 21-3732-PET, VELCO’s New Haven Operations Facility in
12 Case 19-4582-PET, and VELCO’s East Avenue and Queen City Substation Improvement Project
13 in Case 18-5029-PET. I have also led several permitting efforts for VELCO and supported other
14 VELCO staff in the development of their prefiled testimony and exhibits for other projects
15 brought before the PUC, including several associated with the Statewide Radio Project. As well,
16 I have prepared several Act 250 land use permit applications for VELCO that include addressing
17 the criteria contained in 10 V.S.A. Section 6086.

18

19

Testimony Overview

20 **Q5. What is the purpose of your testimony?**

21 **A5.** My testimony supports the Petition filed by VELCO requesting a Certificate of
22 Public Good (“CPG”), pursuant to 30 V.S.A. § 248, for the installation of an Advanced Power

1 Flow Controller at the VELCO Sandbar Station in Milton, Vermont (the “Project”). My
2 testimony summarizes how the Project will comply with the environmental and historic sites
3 criteria applicable to electric transmission projects under 30 V.S.A. § 248. Specifically, I discuss
4 the following statutory criteria: outstanding resource waters (10 V.S.A. § 1424a(d)), air and
5 water pollution (10 V.S.A. § 6086(a)(1)), headwaters, (10 V.S.A. § 6086(a)(1)(A)), waste
6 disposal (10 V.S.A. § 6086(a)(1)(B)), water conservation (10 V.S.A. § 6086(a)(1)(C)),
7 floodways (10 V.S.A. § 6086(a)(1)(D)), shorelines (10 V.S.A. § 6086 (a)(1)(F)), streams (10
8 V.S.A. § 6086(a)(1)(E)), wetlands (10 V.S.A. § 6086(a)(1)(G)), water supply (10 V.S.A. §
9 6086(a)(2) and (3)), soil erosion (10 V.S.A. § 6086 (a)(4)), and rare, threatened and endangered
10 species (RTE), rare and irreplaceable natural areas and necessary wildlife habitat (10 V.S.A. §
11 6086(a)(8)). My testimony also addresses additional criteria under 30 V.S.A. § 248(b)(5):
12 historic sites, greenhouse gas impacts, use of natural resources, and primary agricultural soils.

13

14

Historic Sites [30 V.S.A. § 248(b)(5)]

15

Q6. Will this Project have an undue adverse effect on historic sites?

16

A6. No. A “historic site” is a site that has been officially included in the National

17

Register of Historic Places and/or the state register of historic places. There are no registered

18

historic sites within or adjacent to the Project.

19

In addition, VELCO retained Gray &Pape, Inc. (GP) to perform an Archaeological

20

Resource Assessment (ARA) to determine the proposed Project area’s sensitivity for

21

archaeological and historic resources. GP reviewed past archeological investigations completed

22

by WSP in 2015-2016 in support of VELCO’s Sandbar Station upgrades (20-0444-PET). GP

1 also conducted a comprehensive review of the Sandbar Station property in 2024 and in 2025
2 returned to the site to review the adjacent residential property recently purchased by VELCO.
3 GP concluded that there were no additional areas of archeological sensitivity that would require
4 further testing. **Exhibit Petitioner JTR-2** (Cultural Resources Review).

5 With respect to Historical Architectural Resources, GP reviewed past investigations
6 conducted by WSP (formerly Louis Berger Group) which concluded there are no historic sites or
7 properties that meet the eligibility criteria for listing within 0.25-mile radius of the Sandbar
8 Station Property. The Vermont Division for Historic Preservation concurred with the findings of
9 the WSP Historical Architectural Resource Investigation in 2020. GP has further concluded that
10 the residence associated with the 1-acre in-holding parcel, recently purchased by VELCO, is not
11 recommended for listing. Therefore, the proposed removal of the residence and any associated
12 structures would not impact historic architectural resources. See Exhibit Petitioner JTR-2.
13 Therefore, the Project will have no undue adverse effect on Historic Sites.

14

15 **Natural Environment [30 V.S.A. § 248(b)(5)]**

16 **Q7. Will the proposed Project have an undue adverse effect on the applicable**
17 **Section 248 environmental criteria?**

18 **A7.** No. VELCO develops and refines its project designs as natural and cultural
19 resource information is collected and analyzed during project planning. Site-specific substation
20 upgrades and facility layout are finalized after the collected information is considered. This
21 iterative process allows VELCO to give due consideration to natural and cultural resource
22 impacts and to develop avoidance and minimization strategies where necessary to ensure

1 compliance with the applicable environmental review criteria. VELCO retained VHB to conduct
2 comprehensive natural resource assessments in a defined Study Area that included the right-of-
3 way (ROW) and Project area, including Project access routes, staging areas, and habitat
4 mitigation areas. VHB's Natural Resource Memorandum and Supporting Attachments are
5 provided in **Exhibit Petitioner JTR-3** (VHB NR Report). As detailed further below, VHB
6 assessed the entire 136 acre property owned by VELCO as well as subsequently assessing the 1-
7 acre residential in-holding property recently purchased by VELCO, collectively referred to as the
8 Project Assessment Area (PAA) or "Study Area". VELCO has avoided and minimized impacts
9 to the surrounding natural resources in the siting and design of the proposed Project to the
10 greatest extent possible. There will be unavoidable impacts to RTE species and mapped Primary
11 Agricultural Soils (PAS), which is further defined in the NR Report, as well as subsequent
12 sections of my testimony.

13 The PAA encompasses approximately 137 acres, however, the Project's footprint, based
14 on the current site design layout, constitutes a much smaller land area of approximately 8.52 total
15 acres. The majority of the Project work will occur within areas of previous disturbance, directly
16 adjacent to the existing station footprint. VELCO will need to create an access road, staging
17 areas and expand a portion of the fence on the northeastern side of the station to accommodate
18 the installation of the proposed electrical equipment. In order to allow for the fence expansion,
19 VELCO will need to realign a small section of transmission line to the north. This relocation was
20 designed to minimize the amount of expanded corridor required.

21 The Project will require approximately 2.66 acres of tree clearing to create access,
22 staging areas, expand the station yard and fence and allow for the transmission line realignment;

1 additional tree clearing will be required in two areas to develop and enhance RTE habitat
2 mitigation areas. These locations are shown in the vegetation clearing plans within Exhibit
3 Petitioner EJM-3.

4 VELCO will follow its Non-native and Invasive Species (NNIS) Monitoring and Control
5 Plan, which is included as **Exhibit Petitioner JTR-4**. In addition, VELCO will perform all
6 Project work in accordance with the VELCO Environmental Guidance Manual (VEGM),
7 provided as **Exhibit Petitioner JTR-5**. As such, the Project will not result in any undue,
8 adverse effects on the natural environment.

9

10 **Water and Air Pollution [10 V.S.A. § 6086(a)(1)]**

11 **Q8. Will the Project result in air pollution or undue adverse impacts on air**
12 **purity?**

13 **A8.** No. Work during the Project's construction phase will result in minor air
14 emissions. There will be vehicle emissions at the sites from the use of diesel and gasoline
15 powered vehicles and equipment. There may also be brief releases of dust generated during
16 equipment and material transport, earthmoving, and general construction activities; however,
17 VELCO will manage dust resulting from construction activities in accordance with the Vermont
18 Standards and Specification for Erosion Prevention and Sediment Control (EPSC) and the
19 VEGM. Furthermore, Project operation, upon completion of the construction phase, will not
20 produce any regulated air emissions. Therefore, the Project will not have an undue, adverse
21 effect on air quality.

22

1 **Q9. Will the Project result in water pollution or undue adverse impacts on water**
2 **purity?**

3 **A9.** No. The proposed Project activities will involve more than one acre of earth
4 disturbance; therefore, the Project will require and VELCO will obtain a Vermont Department of
5 Environmental Conservation (VT DEC) Construction Stormwater Discharge Permit. VELCO
6 will perform all earth disturbing activities in accordance with the Construction Stormwater
7 Discharge Permit, the Vermont Standards and Specifications for EPSC, and the VEGM.

8 The Sandbar Station is included in VELCO's Spill Prevention, Control, and
9 Countermeasure (SPCC) Plan, which addresses the operational oil-filled equipment at the
10 substation to prevent a discharge of oil into navigable waters. VELCO will adhere to its SPCC
11 Plan, which includes site-specific drainage pathways and detailed information on spill response
12 measures to ensure protection of waters adjacent to the station in the event of a release of oil or
13 hazardous material to the environment. Implementation and adherence to the EPSC Plan,
14 VEGM, SPCC Plan, and environmental compliance inspections throughout the Project's
15 construction activities will ensure the protection of water quality.

16 If a release of a hazardous material were to occur during the Project's construction phase,
17 VELCO would take appropriate steps to contain it; report the release to the DEC (as necessary);
18 remove the contaminated material from the site for proper disposal; and restore the area in
19 accordance with the VEGM and applicable State and Federal Regulations. Obtaining and
20 complying with the Construction Stormwater Discharge Permit, the VEGM, and applicable
21 regulations will maintain existing water quality at the Project site. As such, there will be no
22 undue adverse effect to water quality.

1 surface waters in the area or have an undue, adverse impact on headwater areas. Please also refer
2 to Exhibit Petitioner JTR-3, at 11-12.

3

4

Waste Disposal [10 V.S.A. § 6086(a)(1)(B)]

5

Q11. Please discuss VELCO's plans regarding waste disposal.

6

A11. The Project will meet applicable VT DEC regulations for the disposal of wastes

7

and not involve injection of waste materials or any harmful or toxic substances into ground water

8

or wells. As outlined in more detail in Exhibit Petitioner JTR-3, waste generated during

9

construction and decommissioning of existing substation components as well as demolition of

10

the existing residential property will be disposed of or recycled in accordance with all applicable

11

Vermont Department of Health and VT DEC regulations. Metal equipment such as structure

12

steel, chain link fence, and the like will be recycled as scrap metal. Any small oil-filled

13

equipment will be handled by a licensed commercial entity, which will test and recycle oil

14

according to federal regulations and will recycle metal components such as scrap metal. The

15

Project will involve limited hazardous material storage for equipment refueling during

16

construction and will comply with all state and federal regulations regarding the handling and

17

disposal of hazardous materials.

18

Clean wood products like pallets that are brought onsite during Project construction as

19

part of material deliveries will be stockpiled and disposed of in accordance with Act 148, the

20

Universal Recycling and Composting Law. VELCO will perform utility pole removal and

21

replacement activities in accordance with the Penta BMPs identified in Docket 8310, which will

22

be a component of onsite training for any personnel that handle penta-treated poles.

1 The Project includes decommissioning of a wastewater and water supply system
2 currently servicing the residential home adjacent to the station. Decommissioning of these
3 sanitary facilities, will be completed in accordance with applicable federal, state and local
4 regulations. During construction, VELCO will dispose of sanitary waste by utilizing portable
5 toilets and the on-site facilities within the Sandbar Station control building.

6 VELCO intends to demolish the recently purchased existing residence located west of the
7 station. Prior to demolition, the buildings will be evaluated for the presence of hazardous
8 building materials, and if encountered, demolition and disposal will be in accordance with
9 applicable regulations. All non-hazardous building materials that cannot be reasonably recycled
10 will be disposed of in accordance with DEC waste management rules and BMPs, as well as any
11 other applicable state and federal regulations.

12 The Project does not require an operational stormwater permit because of the limited
13 expansion and the total resulting impervious area associated with the Project is less than one
14 acre. Additionally, the Project does not involve the construction or redevelopment of more than
15 one-half acre of impervious area.

16 By following state and federal regulations regarding the disposal of waste, obtaining all
17 necessary permits, and by following BMPs with respect to waste disposal, the Project will not
18 have an undue adverse impact on the natural environment.

1 **Water Conservation & Supply [10 V.S.A. § 6086(a)(1)(C) & (a)(2)&(3)]**

2 **Q12. Please describe water conservation measures associated with the Project.**

3 **A12.** Water use associated with the overall Project is expected to be minimal.

4 Construction may involve the use of water for dust control and for vegetation establishment.

5 There are no new water connections proposed as part of the Project, and no water is required for
6 the operation of the Project. See Exhibit Petitioner JTR-3, at 12-13, 16. As such, the Project will
7 not have an undue adverse impact on the natural environment, use excessive water, or unduly
8 impact existing water supplies.

9
10 **Floodways [10 V.S.A. § 6086(a)(1)(D)]**

11 **Q13. Will the Project restrict or divert the flow of floodwaters; cause or contribute**
12 **to fluvial erosion; or endanger the health, safety, and welfare of the public or of riparian**
13 **owners during flooding?**

14 **A13.** No. The PAA includes areas that are within the Flood Hazard Area of the
15 Lamoille River, however, the Project is located well outside of this zone. The proposed site
16 drainage improvements that are planned for the Project will not significantly alter existing
17 drainage characteristics with respect to drainage area contributions and flows. The Project will
18 not have any undue, adverse impacts on floodways or river corridors, nor will the Project
19 endanger the health, safety, or welfare of the public or riparian owners as it relates to flood
20 events or fluvial erosion. Please also refer to Exhibit Petitioner JTR-3, at 13.

1 Area and associated access are proximate to MI-3 which is a Class II Wetland. Exhibit
2 Petitioner JTR-3, at 15-16.

3

4 **Q17. Will the Project impact the identified wetlands or their 50-foot buffers?**

5 **A17.** No, the Project has been specifically designed to avoid impacts to identified
6 wetlands and any associated 50-foot buffers. In areas where Project activities are proximate to
7 wetlands, VELCO will implement signage and flagging to maintain avoidance. In addition,
8 VELCO will employ project-specific EPSC measures, follow the BMPs laid out in the VEGM,
9 and will comply with the conditions in the Project's Construction Stormwater Discharge Permit.
10 By designing the Project to avoid direct wetland impacts and following permit conditions and
11 best practices, the Project will not have an undue adverse impact on wetlands or the natural
12 environment.

13

Soil Erosion [10 V.S.A. § 6086(a)(4)]

14 **Q18. Will the Project cause unreasonable soil erosion or reduce the capacity of the**
15 **land to hold water so that a dangerous or unhealthy condition may result?**

16 **A18.** No, it will not. VELCO will perform all earth-disturbing activities in accordance
17 with the site-specific EPSC Plan, the Construction Stormwater Discharge Permit conditions, the
18 Vermont Standards and Specifications for EPSC, and the VEGM. With the adherence to these
19 conditions and BMPs, the proposed construction activities will not cause undue soil erosion or
20 cause a reduction in the capacity of the land to hold water.

1 **Rare and Irreplaceable Natural Areas, Necessary Wildlife Habitat, Endangered Species [10**

2 **V.S.A. § 6086(a)(8)**

3 **Q19. Will the Project impact rare and irreplaceable natural areas?**

4 **A19.** No. VHB performed an assessment for Rare and Irreplaceable Natural Areas
5 (RINA). Based on a desktop review and a field assessment, VHB identified two potentially
6 Significant Natural Communities within the PAA, a Dry Oak-Hickory-Hophornbeam Forest (S3)
7 and a Dry Oak-Maple Limestone Forest (S3). These State uncommon (S3) ranked communities
8 would not constitute a RINA, and moreover neither of the communities are proposed to be
9 impacted by the Project. See Exhibit Petitioner JTR-3, at 17-18. As such, there will be no undue
10 adverse effect on RINA.

11
12 **Q20. Will the Project impact necessary wildlife habitat?**

13 **A20.** No. Necessary Wildlife Habitat is generally defined as deer wintering habitat,
14 black bear forage habitat or travel corridors, moose overwintering area, amphibian breeding
15 habitat, or grassland bird habitat. There is no Black Bear Habitat, moose overwintering area, or
16 grassland bird habitat within the PAA. VHB identified two ANR-Mapped deer wintering areas
17 (DWA) on the north side of Bear Trap Rd, with the closest occurrence being approximately 190-
18 feet from the project entrance. Additionally, VHB identified a potential DWA during the 2024
19 field assessments, which occurs in the eastern corner of the PAA more than 500 feet away from
20 the Project. Exhibit Petitioner JTR-3, at 18-19.

21 The Project will not have any direct impacts on the ANR mapped DWA, or the potential
22 DWA identified by VHB. As part of the NR Assessment, VHB opined: “Though proposed

1 work, including road building, construction traffic, and project staging will occur within 190 feet
2 of the state-mapped occurrence it is not likely to indirectly impact wintering deer due to its
3 proximity to U.S. Route 2, Bear Trap Road, and the existing Station facility.” Exhibit Petitioner
4 JTR-3, at 18-19.

5 VHB identified six potential vernal pools (PVP) within the PAA, none of which are
6 proximate to the Project work areas. There are no proposed impacts to PVPs as part of this
7 Project, the nearest PVP occurrence is over 750 feet away from proposed work to the Northeast
8 and therefore there will be no direct or indirect impacts to PVPs or amphibian breeding habitat.
9 Exhibit Petitioner JTR-3, at 19. As such, there will be no undue adverse impact on necessary
10 wildlife habitat.

11

12 **Q21. Will the Project destroy or significantly imperil any rare, threatened, or**
13 **endangered species?**

14 **A21.** No. Several populations of Rare, Threatened, and Endangered (RTE) plant
15 species are mapped and known to occur within the PAA. As such, targeted RTE plant Surveys
16 were conducted by VHB in 2024 in order to confirm the presence, location and extent of any
17 RTE individuals or populations that occur proximate to the Project that would be subject to a
18 Threatened and Endangered Species Takings Permit (Takings Permit) from the Vermont Fish
19 and Wildlife Department (VT FWD). VHB identified a number of RTE species that occurred
20 within the PAA, see Exhibit Petitioner JTR-3 at 19 -21, the majority of which will be avoided by
21 the Project.

1 VHB identified populations of *Cyperus houghtonii* (Houghton's flatsedge) that occurs in
2 several areas around the existing station. Due to the proximity of the Houghton's flatsedge to the
3 existing station, engineering requirements for interconnection within the existing station, site
4 topology, as well as the presence of other RTE species on the property, impacts to the
5 Houghton's flatsedge are unavoidable. Additionally, unavoidable impacts to *Crocanthemum*
6 *canadense* (Canada frostweed) and *Eutrochium purpureum* var. *purpureum* (Sweet Joe-pye
7 weed) are also proposed as part of the Project, however neither of these two species are listed as
8 Threatened or Endangered, so impacts to those species do not require a Takings Permit. Exhibit
9 Petitioner JTR-3, at 19-21.

10 VELCO has designed the Project to minimize impacts to RTE species, specifically
11 Houghton's flatsedge by limiting Project activities to the northern side of the station, accessing
12 the Project from the west, which has allowed the Project to completely avoid a separate area of
13 Houghton's flatsedge as well as other species including a historic occurrence of *Botrychium*
14 *rugulosum* and an area where a potential occurrence of *Corallorhiza odontorhiza* (autumn coral-
15 root) was identified during a site visit with VT FWD.

16 For unavoidable impacts to Houghton's flatsedge, the Project will obtain a Takings
17 Permit from VT FWD and all Project activities will be conducted in accordance with all
18 conditions including the mitigation and monitoring requirements. In order to mitigate impacts to
19 Houghton's flatsedge, VELCO has collaborated with FWD and the Flora Advisory Group, to
20 develop a plan to create a habitat mitigation area away from the station to support future
21 populations of the species. Exhibit Petitioner JTR-3, at 21.

1 VELCO will re-survey proposed RTE impact areas, the existing and proposed mitigation
2 area, and the location of potential autumn coral-root, as well as survey the approximately one-
3 acre residential property located west of the existing station as the Project component was added
4 after the 2024 growing season. There are no mapped occurrences of RTE species within this 1-
5 acre property, and the majority of the property is maintained lawn, driveway, residential structure
6 or outbuildings.

7 The Project will utilize the updated survey information in its Takings Permit application,
8 and associated mitigation and monitoring plan. If any new occurrences of Threatened or
9 Endangered species are identified during the follow-up surveys the Project will either avoid
10 them, or obtain a Takings Permit for unavoidable impacts.

11 With respect to animal RTE species, VHB conducted queries of the USFWS IPaC
12 database as well as a review of the NHI database, and identified RTE animal species that occur
13 within one-mile of the PAA. The PAA is within the potential summer range of the Northern
14 Long-eared Bat, as well as potential occurrences of the tricolored bat. The Project plans to avoid
15 impacts to these species by implementing time-of-year restrictions on tree clearing. VHB also
16 identified four species for which Elemental Occurrences (EO) intersect the PAA. Three of the
17 four species are aquatic in nature and occur within the Lamoille River, away from Project
18 activities. The fourth occurrence is the little brown bat, which is often found in structures. The
19 Project will perform a presence/absence survey of the residential structure prior to demolition if
20 the structure cannot be removed during the hibernation period. Exhibit Petitioner JTR-3, at 21-
21 22.

1 By implementing the aforementioned avoidance, minimization and mitigation measures,
2 the Project will have no undue adverse effect on RTE species.

3

4 **Greenhouse Gas Impacts and Use of Natural Resources [30 V.S.A. § 248(b)(5)]**

5 **Q22. Will the proposed VELCO Project construction or operation of the Project**
6 **have any significant impacts on greenhouse gas or the use of natural resources?**

7 **A22.** No. Construction will require the use of vehicles and equipment that are powered
8 by fossil fuels and create greenhouse gas emissions, but those emissions will be limited in nature
9 and duration. Construction will not involve sustained or undue greenhouse gas emissions.

10 The Project does not involve the installation, removal or modification of any sulfur
11 hexafluoride (SF6) electrical equipment.

12 With respect to the use of natural resources, the Project's construction will use fossil
13 fuels for certain equipment and vehicles; stone/gravel for the access drive, construction staging,
14 and the fence expansion; and mulch and seed on disturbed areas in accordance with ANR's
15 Standards and Specifications for Erosion Prevention and Sediment Control and the VEGM. The
16 use of these natural resources will not be undue and are typical of construction projects of this
17 type.

1 **Primary Agricultural Soils [30 V.S.A. § 248(b)(5)]**

2 **Q23. How were impacts to primary agricultural soils as defined by 10 V.S.A. §**
3 **6001(15) given due consideration in developing plans for the Project?**

4 **A23.** The Project is an expansion of an existing facility, parts of which were
5 constructed on soils that are currently mapped as Statewide agricultural soils. The Project has
6 been designed to minimize impacts on Primary Agricultural Soils (PAS), by expanding existing
7 development, redeveloping areas such as the existing residence and utilizing areas that have been
8 subject to past disturbance, where PAS are no longer intact. Past land use of this area consists of
9 earth extraction, residential development, development of transportation infrastructure (namely
10 the relocation of US Route 2) and the development of utility infrastructure, including the
11 construction of the transmission line, historic access routes, development of the original Sandbar
12 station, and the subsequent upgrades and expansions since the initial construction.

13 The Project overlaps 3.52 acres of PAS that is currently developed including access
14 drives, station footprint, residential home, and associated driveway. The Project overlaps
15 approximately 2.43 acres of mapped PAS that is not currently developed, however the majority
16 of this area consists of areas that have been previously impacted by past disturbance and
17 development. Exhibit Petitioner JTR-3, at 9.

18 A portion of the 2.43 Acres of mapped PAS contains the presence of a state-listed
19 Endangered Plant which is proposed to be impacted by the Project. As part of the development
20 of the VT FWD takings permit, VELCO has committed to mitigating impacts to this species. As
21 part of this mitigation, VELCO is developing plans in close consultation of the VT FWD, to
22 conduct a soil relocation effort on the property with the goal of relocating the entire seedbank of

1 the population of endangered species, rather than transplanting individuals. The area proposed
2 for the mitigation area is outside of mapped PAS. For more information on VELCO’s plans for
3 RTE Mitigation, please see Exhibit Petitioner JTR-3, at 19-21.

4 The past land use, current development present at the site, coupled with the physical and
5 geographic barriers such as rock outcrops, adjacent steep slopes and sandy soils also diminish the
6 ability of any remaining intact PAS to be utilized for the production of food, feed, fiber, forage,
7 and oil seed crops. *“While these areas are mapped as PAS, VHB opines they have lost their
8 agricultural value based on surrounding land use consisting of electrical and adjacent
9 transportation infrastructure, steep topography, and soils largely consisting of sand.”* Exhibit
10 Petitioner JTR-3, at 9.

11 As such, VELCO has given due consideration to the mapped PAS in the design and
12 development of the Project, and there will be no significant impacts to farming, farming
13 potential, or PAS as a result of the Project.

14

15 **Outstanding Resource Waters [10 V.S.A. § 1424a(d) & 30 V.S.A. § 248(b)(8)]**

16 **Q24. Will the Project result in an undue adverse effect on any Outstanding**
17 **Resource Waters?**

18 **A24.** No. There are no Outstanding Resource Waters within or in the vicinity of the
19 Project Area. Exhibit Petitioner JTR-3, at 8. Therefore, the proposed Project will have no undue,
20 adverse effect on Outstanding Resource Waters.

1 **Q25. Does this conclude your testimony at this time?**

2 **A25. Yes.**

DECLARATION OF JACOB T. REED

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.

June 30, 2025
Date

/s/ Jacob T. Reed
Jacob T. Reed