



110 West Canal Street, Suite 202  
 Winooski, VT 05404-2109  
 802-846-4490  
[www.ccrpcvt.org](http://www.ccrpcvt.org)

May 7, 2025

Holly R. Anderson  
 Clerk of the Public Utility Commission  
 112 State Street  
 Montpelier, VT 05620-2701

Re: Milton Advanced Power Flow Controllers (VELCO) Advanced Notice for the installation of 12 APFC's to the existing Sand Bar Station on 586 Bear Trap Road, Milton (case #25-0603-AN)

Dear Ms. Anderson,

The Chittenden County Regional Planning Commission ("CCRPC") has received the 45-day notice of the above-named application submitted by the Vermont Transco, LLC and Vermont Electric Power Company, Inc (together VELCO) to install 12 Advanced Power Flow Controllers to the Sand Bar Station in Milton. The intent of the APFC's is to maintain power reliability in the region. The installation will require extension of the existing fence 187 feet to the east, making the new total fenced in area 41,240 square feet. The project will also require the relocation of a few transmission lines and the construction of a new access road.

CCRPC has reviewed this project's conformance with CCRPC's *2018 Chittenden County ECOS Plan* ("the Plan"), which gained a Determination of Energy Compliance from the Vermont Department of Public Service on August 9, 2018.

#### ECOS Energy Goal

CCRPC finds that this project meets the intent of the Energy Goal (Goal #17) of the Plan: "Move Chittenden County's energy system toward a cleaner, more efficient and renewable system that benefits health, economic development, and the local/global climate by working towards the State's Comprehensive Energy Plan goals."

The project is intended to increase the efficiency and reliability of power from the Sand Bar Station; therefore, it meets the goal by benefiting economic development.

#### Constraints Policies

The *2018 ECOS Plan* states that energy facility development should be located to avoid state and local known constraints that have been field verified, and to minimize impacts to state and local possible constraints that have been field verified (Strategy 3, Action 1.f and Strategy 4, Action 1.f and Action 2.e). Our review indicates that the following constraints are located on the subject property:

#### State Known Constraints

- **FEMA Floodways.** FEMA Floodways are mapped onsite. The proposed project is proposed in a location that impacts to this resource will be avoided.
- **DEC River Corridors.** DEC river corridors are mapped onsite. The proposed project is proposed in a location that impacts to this resource will be avoided.
- **State-significant natural communities and rare, threatened, and endangered species.** The desktop analysis showed an area onsite mapped with a rare, threatened, or endangered plant and a state-significant natural community. The proposed project is in the mapped area. CCRPC requests more information about whether this constraint will be impacted by the proposed project in the full petition.

If there are impacts, CCRPC requests that the applicant works with the Agency of Natural Resources to ensure that impact to this resource are avoided.

- **Class 1 and 2 Wetlands.** Wetlands are mapped onsite. The proposed project is in a location that impacts to this resource will be avoided.

#### State Possible Constraints

- **Agricultural Soils.** Primary Agricultural Soils underlie a majority of the site, some of which may be considered previously impacted by the development of the substation. CCRPC requests that further impacts to the agricultural soils be minimized in accordance with the recommendations of the Vermont Agency of Agriculture, Food, and Markets.
- **FEMA Special Flood Hazard Areas.** FEMA Special Flood Hazard Areas are mapped onsite. The proposed project is proposed in a location that impacts to this resource will be avoided.
- **Vermont Conservation Design Highest Priority Forest Blocks.** The desktop analysis showed both the highest priority connectivity forest blocks and highest priority interior forest blocks mapped on a large portion of parcel. The proposed project is located in the mapped area. CCRPC requests more information about whether this constraint will be impacted by the proposed project. The resource was likely already impacted by the existing substation. If there are new impacts, CCRPC requests that the applicant works with the Agency of Natural Resources to ensure that impacts to this resource are minimized.

This review is based on the information currently available. CCRPC will review and comment on materials submitted as the Section 248 review process continues.

Thank you for your time and attention.

Sincerely,



Charlie Baker  
Executive Director

CC: CCRPC Board  
Cymone Bedford, Milton Planning & Development Review Director