

VERMONT PUBLIC SERVICE BOARD

Case name Lazar Solar
Docket # _____
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Date prepared: 12/31/15

IN RE:)
BDE East Montpelier) NO:
Lazar Solar, LLC 500 kw Group)
Net Metered Solar Array)
Located off of Route 2)
East Montpelier, VT)
)
)
)
)
)
)

MOTION TO INTERVENE AND OBJECTION TO PROJECT

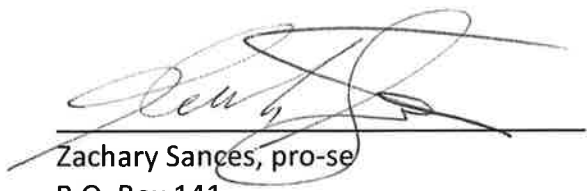
NOW COMES Zachary Sances , appearing pro-se and hereby moves this board for an entry of an Order permitting him to become a party to this action and being permitted to intervene in the above captioned matter pursuant to Board Rule 2.209 A) and (B) and further objects to the proposed project and in support thereof states as follows:

1. That I am both an adjoining landowner and a lot owner at 2537 US Route 2, in a subdivision in which Lazar Solar plans to build a solar array.
2. That there are 7 lots that are part of the subdivision and Lazar Solar plans to develop the solar array on 6 of the lots behind the historic home that I currently reside in.
3. That all 7 lots are currently governed by covenants which restrict the development on the lots to residential and the plan that is proposed is clearly nonresidential and is in violation of this part of the covenants.
4. That the covenants also restrict all utility lines to be buried underground and the plan that is proposed violates this tenet as set forth in the covenants.
5. That the access road to be built runs through my property and is a limited right of way for the purpose of access to residential property and was neither designed nor anticipated for a solar project. (see Appendix A- Subdivision Map)
6. That using this access road for other purposes would interfere with my property rights.
7. That building any power lines on or over my property would also interfere with my property rights.

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8. That the home I live in is historic and is included in the book Across the Onion , a history of East Montpelier, Vermont 1781-1981.
9. That the field behind the house which is the proposed site for the solar array contains a rare field of lupines which is well known in the community and is currently a site visited by deer, wild turkeys and other animals.
10. That the development of this field would have an adverse effect on the natural beauty, aesthetic and the historic nature of my property and in addition, would destroy the habitat for the deer and other wildlife contrary to 10 V.S.A Sec. 6086 (a) (8) and 30 V.S.A 248 (b) (5).
11. The proposed project will undermine the historic nature of the village of East Montpelier as a whole due to the prominent location of the proposed array and the clear visibility of the project from various points in the Village.
12. That the proposed project is contrary to the Public Good.
13. That as a part of the same subdivision, my property is adversely affected by the outcome of the Lazar Solar array and my interest is not adequately protected by any existing party in this action.
14. That this proceeding addresses several historic and aesthetic issues that are relevant to the jurisdiction of this Board.
15. That my intervention will not unduly prejudice any party to this action.

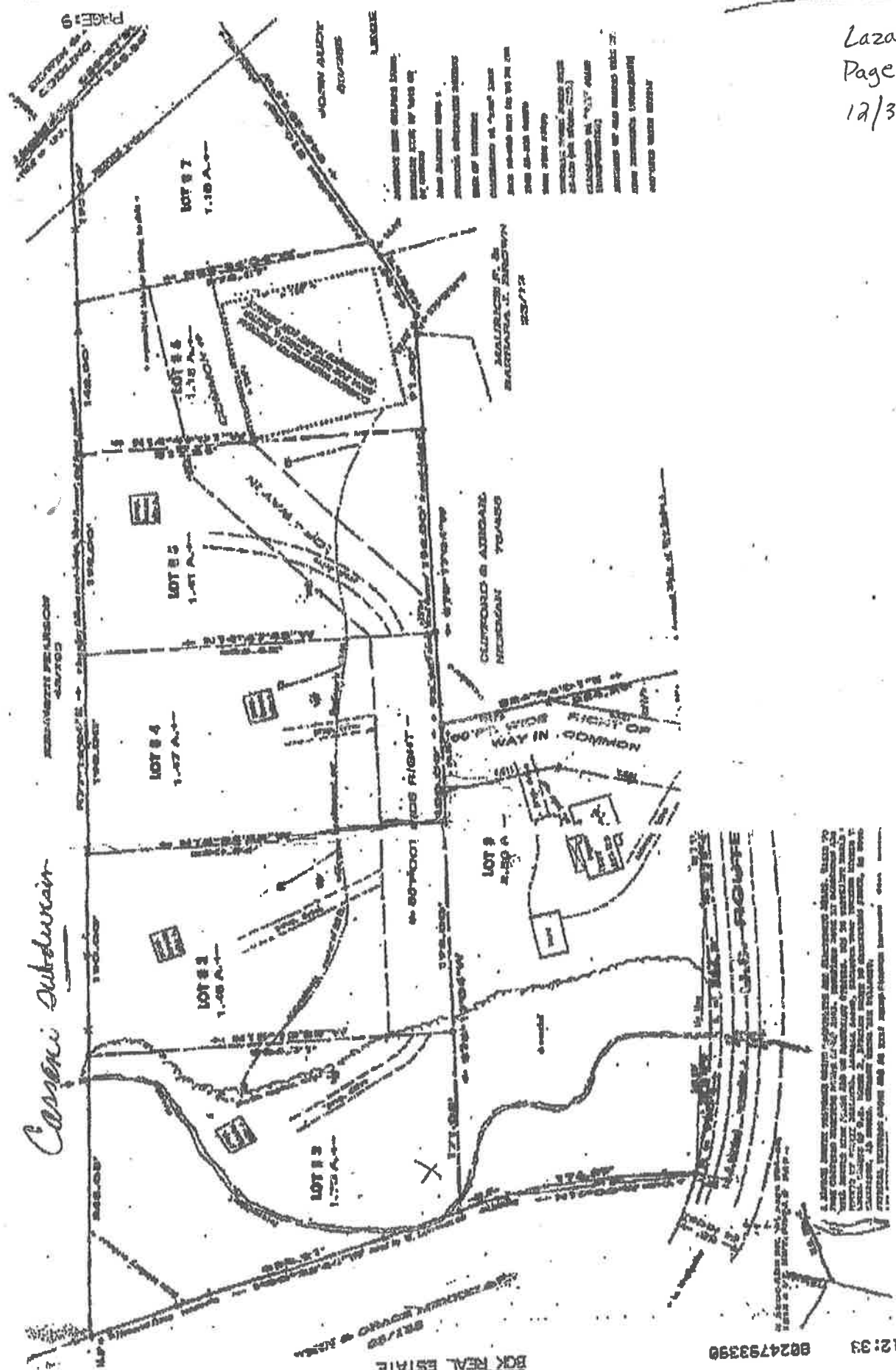
That based on the foregoing, I hereby respectfully request permission to intervene in this action and further request a hearing date in order to have my above objections to the Lazar Solar project addressed.



Zachary Sances, pro-se
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dated 12-31-15

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Cassini Subdivision