

VT Energy Generation Siting Process Strengths & Weaknesses

(Participant) perspective

Presented to:

***VT Energy Generation
Siting Policy Commission***

Meeting #4 – Perspectives from Participants in
the 248 Process

(Dec. 6, 2012)

Intro to the Green Mountain Club

- Founder of the Long Trail, Manager of 500 Miles of Vermont Hiking Trails
- 10,000 Members, Established 1910
- Responsible “for the leadership in the development of policies” relating to the Long Trail (Vt. General Assembly, 1971)
- Headquarters 100% Powered by On-Site, Renewable Energy
- Party Status in Lowell PSB Hearings; Appellant to U.S. Forest Service re: Deerfield

Public Service Board Process (Sec. 248)

Strengths & Weaknesses

- Responsive to Green Mtn. Club Testimony
- Professional and Structured
- Expensive for a Non-Profit
- Requires Formal Counsel and Experts
- Parties Restricted to Specific Topics

Process re: Protection of Lands, Environmental & Cultural Resources

Concerns:

- Energy Projects Over 2,500 ft. Treated Differently Than Any Other Type of High-Elevation Proposal
- Sec. 248 Does Not Consider Cumulative Impacts of Multiple Projects (“Orderly Development” Standard Is Insufficient)
- Act 250 Criteria Optional Under Sec. 248

Process re: Protection of Lands, Environmental & Cultural Resources

Concerns (cont.):

- Conserved Lands Must Remain Protected
- No Agency Is Tasked With Supporting the ‘Public Good’ Regarding Aesthetic Impacts and Historic/Cultural Impacts
- PSB Is Expected to Promote Energy Development, Not Protect Our Environment

Policy & Process Recommendations

- Cumulative Impacts Must Be Considered
- Energy Projects Should Live Up to Act 250-Level Protections – Including Closing the 2,500 Ft. Loophole for Energy Projects
- Public Lands Should Remain Protected
- An Intervener Fund Should Be Established
- The State Should Establish Aesthetic and Cultural Criteria for Project Impacts and Advocate for that Part of the ‘Public Good’