



Energy Generation Siting Policy Commission Remarks

**Gil Livingston, President
Vermont Land Trust
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VLТ background and role:

35 year old, membership organization that has protected 0.5 M acres in 1,600 parcels

Working forest, working farms, community lands focus with lens around habitat and water quality.

Important to know we are not an advocacy organization and have not actively participated in Act 248 proceedings.

VLТ's board is very concerned about Global Climate Change. Our organizational objectives include an explicit focus on Global Climate Change.

With specific reference to Community Conservation, our Board directs staff to:
"Support renewable energy production that meets community needs."

Our conservation work has carbon mitigation outcomes:

Perhaps 300,000 acres of conserved forest with easements that require long-rotation management.

Conserving rural lands compliments support smart growth principles.

Many conserved farms have renewable energy production. Examples include:

The Lazors' Butterworks Farm in Westfield has wind generation.

There are methane digesters on a few farms, including the large Montagne family dairy in St. Albans.

And the Kingsbury Farm in Waitsfield now owned by Vermont Food Bank has solar trackers.

VLT is regularly pressed by its members to oppose solar and wind facilities, and to support such facilities. Many feel conserved land should be opened to renewable development and others think they should be off limits for even small scale energy to serve farm energy needs.

Much divisiveness accompanies renewable energy siting because of case-by-case analysis, a lack of clear criteria, the lack of a comprehensive siting plan and the dichotomy between financial winners and losers.

Four recommendations:

(1) With our friends at The Nature Conservancy and the Trust for Public Land, landscape scale and smaller, natural community scale protection has been underway for decades. Protection of Vermont's natural legacy is very important, so a rigorous evaluation process is important.

Building on intensive natural resource mapping from the Vermont Biodiversity Project, ANR has recently completed updated and comprehensive resource mapping. This compilation should be the starting point for analyzing the natural resource impacts of energy siting.

But templates for natural and cultural resource impact analysis exist:

US Fish & Wildlife Service, Wind Turbine Guidelines Advisory Committee recommended guidelines:

http://www.fws.gov/habitatconservation/windpower/Wind_Turbine_Guidelines_Advisory_Committee_Recommendations_Secretary.pdf

The American Wind Wildlife Institute (Vermont's Jan Blittersdorf is the AWWI board chair): <http://www.awwi.org/resources.aspx>

Sierra Club: http://www.sierraclub.org/policy/conservation/wind_siting.aspx

Conservation Law Foundation and the Massachusetts Clean Energy Center (see appendix): http://www.clfventures.org/wp-content/uploads/Wind_Guide.pdf

State Guidelines:

South Dakota:

<http://gfp.sd.gov/wildlife/docs/wind-power-siting-guidelines.pdf>

Kansas:

http://kec.kansas.gov/wptf/Kansas_Siting_Guidelines.PDF

So my first recommendation is to implement a thorough, rigorous natural resource impact system, starting with the ANR mapping system.

(2) A corollary to the first point: Siting should evaluate cumulative impacts on a landscape scale, beyond site-specific impacts.

(3) Act 248 should encourage and not erect barriers for new community renewable energy generation: those that are owned by Vermont communities or directly serving citizens in our communities. Group net metered projects, community energy facilities, municipal utility projects and farm-based energy generation deserve special support.

(4) Concentrating the financial benefits of energy facilities exclusively in host towns is not equitable. Mapping and other tools could help measure how impacts are geographically distributed. Financial benefits should align with impacts.

Thank you for your willingness to take on the difficult challenges of improving the siting process.