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October 24, 2012

Executive Office of Governor Peter Shumlin
109 State Street, Pavilion
Montpelier, VT 05609

Commissioner Elizabeth Miller
VT Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

RE: Governor's Energy Generation Siting Policy Commission

Dear Governor Shumlin and Commissioner Miller;

As one who supports your administration's policies with regard to renewable energy, I was heartened to see that you have appointed a commission to further study the state of renewable energy development in Vermont as well as the Public Service Board's role in the permitting of grid scale projects and related energy development and transmission infrastructure. This is a recommendation I actually forwarded to the Commissioner during the outreach process for the development of the state's energy plan; I am also on record before the PSB as stating that I did not believe the Quechee Analysis, as currently employed, anticipated these types of projects and therefore provides an imperfect platform for their review.

As Principal of LandWorks I have been professionally involved in a wide range of energy related projects throughout New England. We were the aesthetic consultants working for the Department in the successful effort to bury the PV20 line adjacent to the Route 2 Causeway in Milton/South Hero (In a meeting with Governor Dean in his office during that time he looked me straight in the eye and said "you will see that the line is buried, right David?". Needless to say I was relieved that the PSB affirmed our arguments!) We were also the Department of Public Service's consultants in the review and permitting of projects such as the Searsburg Wind Farm and the Northwest Reliability Project. Currently we have been working for the State of Maine in developing protocols for the review of cumulative impacts from wind energy projects and in the review and permitting of individual wind projects. We have and are working for state utilities (Green Mountain Power - Kingdom Community Wind) and regional utilities (Northeast Utilities - ongoing projects) in visual and environmental impact assessment. We recently assisted the Town of Shelburne in developing protocols for the review and protection of scenic and historic resources, in anticipation of energy and utility projects, and the Town of Charlotte in their review of a proposed solar farm on Charlotte-Hinesburg Road. As such, we have extensive experience studying the inter-relationships of energy development, community character, visual and aesthetic impacts and the costs and benefits associated with these types of proj-



ects.

A number of key considerations that I would forward to you and the Commission include:

- The testimony of the Conservation Law Foundation's expert on the viability of grid scale wind energy is as cogent an argument for this form of renewable energy that I have heard. I will email a copy to the Commissioner;
- Concerns with regard to the requirement of town approval for an energy project to go forward - it strikes me that this is the very reason these decisions are rightfully in the province of a state regulatory body - most towns, when given the opportunity, will listen to the vocal and passionate opposition that exists for almost every proposed project - and will not support the implementation of such projects. I would wager that the NRP would never have been built for example, if individual towns had veto power. There does need to be, however, a viable and meaningful participation opportunity for towns;
- The need to take a long distance view of where grid scale wind energy can be built with minimal aesthetic impact - a statewide viewshed and land use analysis might be a starting point for addressing this overarching question of where?;
- The need to strengthen town plans and documents to address where energy projects can and where energy projects cannot be suitably developed. This will require a concerted and defensible basis by which to identify and protect valued scenic and cultural resources from potential impacts. Town plan prohibition of renewable energy types is a dangerous precedent - there is a reason why towns cannot prohibit telecommunications facilities, although they can and should provide standards and guidance as to siting and mitigation;
- The value of an impartial presentation and understanding of the actual impacts of wind, solar biomass, hydro and transmission projects - there is so much hyperbole and unsubstantiated information about impacts that we truly need to establish an objective baseline- with regard to effects on tourism, property values, health and recreation - and these should be based on actual studies and evaluations - perhaps of the projects already built in Vermont;
- A robust examination of mitigation options, examples and their application and efficacy - to include everything from purchase of conservation lands and private homes - to education - to landscape plantings and restoration; and
- It will be important to consider an advisory group to the Commission - the Commission is comprised primarily of former public sector officials - a broader perspective is necessary, one that includes the input of utility representatives, developers, local officials, environmental organizations, experts, and perhaps even, in the parlance of the Quechee Test, the "average person".



Finally, I would welcome an opportunity to share with the Commission our experiences in Vermont, Maine, Massachusetts, New York and New Hampshire with regard to energy, aesthetics and community character. I believe I can provide a unique perspective that will help to advance both the discussions and the solutions. I do hope I will have that opportunity.

Respectfully,



David Raphael MLA, ASLA
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Planner

Lecturer
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Chair
Planning Commission and Development Review Board
Town of Panton

cc: Ms. Sarah Hofmann, Deputy Commissioner



