

Holly R. Anderson
Clerk of the Commission
Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620

Dear Ms. Anderson,

The Two Rivers-Ottauquechee Regional Commission ("TRORC") appreciates the opportunity to comment on the potential changes to Rule 5.100 announced by the Vermont Public Utility Commission ("Commission"). The following letter is in response to the Commission's interest in developing standards to address forest clearing associated with net-metering systems, and in particular to the August 24, 2021 presentation from the Agency of Natural Resources (ANR) titled, "*Forest Conversion for Net-Metering: Trends & Options to Reduce*".

TRORC appreciates the PUC's concern about forest clearing associated with net-metering systems, and finds that ANR's proposal for addressing the issue is generally aligned with TRORC's policy around forest conversion for renewable energy development. TRORC's enhanced energy plan classifies Wilderness Areas as unsuitable, or prohibited locations, for development. Additionally, TRORC considers forests that are in forest blocks (further defined in TRORC's Regional Plan) to be constraints for development, requiring detailed mapping at the site level and an evaluation of the impacts on the particular resources in order to make a determination on whether development should be permitted.

TRORC also recognizes the need, however, to balance the importance of preserving trees with the mandate to increase in-state renewable energy generation under Vermont's renewable energy standard and the Vermont Global Warming Solutions Act. The PUC should strive to protect forest blocks from conversion without putting unnecessary restrictions on much-needed solar development. As such, TRORC supports the proposal identified as "Option 2: Prohibit Excessive Forest Conversion at Forested Sites" in ANR's presentation referenced above, with the condition that "excessive forest conversion" be clearly and objectively defined, and not left to a subjective, case-by-case review. TRORC recommends the following definition for "Excessive Forest Conversion":

"Forest clearing for the project (including roads and staging areas) in excess of 1 acre of any deer yards or significant wildlife habitat; of an amount greater than 0.2 acre per 100 kW nameplate generation capacity of the proposed facility (including existing generation on site); any interior clearing further than 300 feet from an existing forest edge in a priority forest block, and; any clearing in a future land use area in any municipal or regional plan that has a policy prohibiting development in forested areas."

TRORC strongly opposes Option 3 in ANR's proposal. Repealing the Joint Letter of Support for preferred sites, particularly without phasing in this repeal, would substantially limit solar development and hamper progress towards municipal and state energy and climate goals.

Sincerely,



Peter G. Gregory, AICP
Executive Director
TRORC

Gerald Fredrickson, Chair ~ Peter G. Gregory, AICP, Executive Director
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