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287 Orchard St.  
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Holly R. Anderson  
Clerk of the Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620

Dear Commissioners,

I would like to express my support for draft changes to the PUC Rule 5.103 definition of "Preferred Site", in particular the addition of the phrase "provided that the site does not require significant forest clearing" and, under section 7 of that definition, that "[t]he letters must include a written determination that the plant is consistent with the applicable town or regional plan."

I was concerned last year to learn that a 500kW solar net-metered project in Brattleboro, at Exit 1, was to be granted a Certificate of Public Good based upon letters of support under section 7 that failed to include such a written determination and that have further resulted in the clearing of eight acres of a forest block. That flawed process ultimately led to the chartering by the Brattleboro Planning Commission of a Preferred Solar Siting Subcommittee, upon which I served, that generated more rigorous standards for the evaluation of applications for Preferred Site letters.

While the latter process did generate a useful discussion of how to weigh the need for renewable energy supply against the carbon storage and sequestration of Vermont's landscape in our efforts to mitigate climate change, the considerable time and energy devoted to that process could have been obviated had the present draft changes to Rule 5.103 been in place at the time. More importantly, the clearing of eight acres of a forest block could have been avoided (in particular a Dry Oak Forest community type that will be important for the adaptation of Vermont's forests to a warming climate).

Thank you for your work drafting these rule changes that go a great distance toward addressing these concerns, and I encourage you to integrate them into the final rules.

Signed,  
Art "Fhar" Miess  
Chair  
Brattleboro Conservation Commission  
(for identification purposes only)

P.S.: due to a warning error, the Brattleboro Conservation Commission was unable to address the issue as a body before the close of public comments.