

CCRPC Long Range Planning Energy Sub -Committee AGENDA

*=attached to agenda in the meeting packet

DATE: Tuesday, July 18, 2017 TIME: 5:00 p.m. to 7:00 pm

Attendees:

- Catherine McMains, Jericho (Chair)
- Matt Burke, Charlotte
- Will Dodge, Essex
- Keith Epstein, South Burlington
- Jeff Forward, Richmond

Staff:

- Melanie Needle, Senior Planner
- Emily Nosse-Leirer, Planner
- Regina Mahony, Planning Program Manager
- Charlie Baker, Executive Director
- Marshall Distel, Transportation Planner

1. <u>Welcome + Introductions</u>

The meeting began at 5:00 pm.

2. Review May 16, 2017 Minutes

The minutes were unanimously approved, with minor edits for clarity.

3. Discussion of Targets, Review Local Known Constraints, and Siting Policy Statement

Melanie presented the PowerPoint that has been created for the CCRPC Board meeting on 7/19/2017 (attached). The presentation covers the latest thinking on establishing electric generation targets for 2050 in Chittenden County. The committee expressed that the latest way of breaking down the electricity generation targets for Chittenden County and establishing high and low generation targets is much easier to understand than previous method.

Matt wondered if there is a benefit to breaking the targets out into generation targets per capita, to look at the amount of generation that would be needed for each municipality based on municipal population.

The committee wondered if it would be possible to represent all energy generation and consumption in MWh instead of BTU in the future.

The committee expressed concern about the analysis of solar and wind generation breakdowns that could meet the generation targets, and staff found a mistake and corrected it in the analysis which alleviated the concern.

Jeff expressed concern that the wind generation per acre factor is off, and that 25 acres per 1 MW of wind is too large, because wind turbines have a much more limited footprint and even ancillary development doesn't take that much acreage. Keith wondered if there would be a benefit of looking at the capacity of recently built projects and the acreage impacted by those projects.

Matt asked for an analysis of how much energy could be generated on preferred sites as identified by towns. Melanie indicated that this may be possible in the future, and that we currently have a rough analysis of generation potential for rooftops in the county.

CCRPC has received feedback from DPS on draft policy language. The committee discussed the feedback that development prohibitions must be equally restrictive between different types of development.

Catherine expressed her belief that towns will need to lean on the regional plan to get substantial deference in PUC proceedings. Charlie discussed the feedback received from Sharon Murray on behalf of the Bolton Planning Commission and Selectboard (attached), and expressed his concern that due to the nature of the regional plan, it will never be able to capture the subtleties of regulation and zoning at the local level. Regina reiterated this, saying that CCRPC staff's interpretation of zoning bylaws and plans represents that nothing is black and white.

Will said that the Essex energy committee is thinking that they may benefit more from the writing and enforcement of town-specific solar siting standards instead of broad prohibitions, and that this would be allowed best by "should" language at the regional level, rather than "shall."

The committee discussed the fact that there is still the option for a joint letter of support from the RPC and a municipality to define a preferred site, per the 7/1/2017 net metering rules. Melanie clarified that we would look for the town to initiate this process.

Regina reviewed a sheet of pros and cons that she developed to help the Board determine whether to say "shall," "should" or neither in the ECOS Plan (attached). The Board will review and take action on this at the meeting on 7/19/17. She explained that Option C contains language that will be in the ECOS Plan no matter what, and Options A and B are options for additional language.

Keith expressed some concerns, saying that the RPC shouldn't necessarily be regulating state defined constraints.

Regina stated that having a "shall" statement will lead to more staff work to review Act 250 projects as well, and Jeff asked why these standards would influence Act 250 review. Regina explained that since this policy would prohibit all development, not just energy, it would influence our Act 250 review as well.

Charlie clarified that the board is looking to give general policy guidance right now, and that a "shall" or "should" statement can still be wordsmith-ed later.

The committee discussed state constraints further, and wondered who would advise for the protection of state identified constraints if they weren't in the regional plan. Regina and Charlie confirmed that ANR, DEC and AAFM would all be able to provide comments.

The committee decided to advise the board that options B and C make the most sense. This guidance is the opinion of the committee members individually, not the position of their municipalities.Matt expressed that he is not comfortable taking a strong stance on this right now and does not represent the position of Charlotte, but personally would favor C and B combined.

Jeff mentioned that even though wetlands are a state known constraint, ANR sometimes allows development in them, and "shall" language may lead to the plan disallowing this kind of mitigation. Jeff prefers Option C as an example, and thinks we should look at where we want development, not where we don't want it. He's strongly against the shall and thinks it would be problematic for CCRPC to play a regulatory role. He motions that the energy committee recommend that the board adopt Option C.

Catherine reiterated that local constraints need to be considered because that's the purpose behind Act 174 and this whole process, so we can't ignore local constraints. She expressed that she previously thought "shall" was the right

option, but now she isn't based our discussion. She thinks that B combined with C is the correct option. This is the correct "first step" down this road, and it's a good cautious first step.

Keith is in agreement with Jeff, but wonders if there is a way to say that building on local constraints should only be allowed if there is a significant positive impact. Charlie thinks that this would be a bit of a warning to developers.

Will's opinion is that he personally prefers C because renewable energy development is key for economic development. He says that he would feel better about B if statute stated that preferred sites could be identified by a joint RPC and municipal letter, instead of having this just in the net metering rules. He thinks there are already sufficient regulatory options for challenging projects and shall is not necessary.



Energy Planning Action Item

CCRPC Board Meeting 7/19/2017

Purpose

 Should the regional plan (ECOS Plan) prohibit development in state and local constraint areas, or act in a more advisory role?



Overview

- Renewable Energy Target
- Acreage Needed to Meet Targets
- Siting Policy Action



Background Information

Electricity Generation Targets

Renewable Electricity Generation Target	MWh	
State Projected Electricity Demand (2050)	10,000,000	
In-State Electricity Generation Target (2050)	5,000,000	
State Imported Electricity Generation (2050)	50%	
Low Target for Renewable Electricity Generation in Chittenden County: 15% of State		
Total Target	756,250	
Existing Renewable Electricity Generation	556,623	
New Generation Needed	199,627	
High Target for Renewable Electricity Generation in Chittenden County: 25% of State		
Total Target	1,265,134	
Existing Renewable Electricity Generation	556,623	
New Generation Needed	708,511	



Area to Achieve Target

Possible Scenario for Achieving the Targets					
	MWh	MW	Acres Needed		
Low Target: New Generation					
75% of Renewable Energy is Land-based Solar	149,720	<mark>122</mark>	<mark>977</mark>		
25% of Renewable Energy is Wind	49,907	<mark>16</mark>	<mark>407</mark>		
Total	199,627	138	1,384		
High Target: New Generation					
75% of Renewable Energy is Land-based Solar	531,383	433	3,466		
25% of Renewable Energy is Wind	177,128	58	1,444		
Total	708,511	491	4,911		

	Acres	Percent
Total Acreage in County (without	342,307 acres	100%
lakes and ponds)		
State Known Constraints	- 86,859 acres	25%
Local Known Constraints	- 26,426 acres (only additional	8%
	acreage over above)	
Acreage Remaining	229,022 acres	67%
Prime Solar Acreage*	11,848 acres	5% of remaining
		acreage
Prime Wind Acreage*	48,238 acres	21% of remaining
		acreage



Analysis Conclusion

- We can meet the solar and wind generation targets with the example provided.
- Chittenden County has over <u>3 times</u> the amount of prime solar acreage and over <u>33 times</u> the amount of prime wind acreage to meet the high target example.



DPS Feedback

- Clear standard is best for the Public Utilities Commission.
- Outline specific areas in your map with supporting text to identify what is and what is not appropriate there and why
- Need to be equally restrictive for all types of development
- General policy guidance is ok







Do you want your regional plan to prohibit energy generation in areas with state and local known constraints?

While not a definitive read on municipal perspective, feedback from mostly Planning Commission/Energy Committees/ Conservation Committees so far:

- 6 yes
- 1 maybe
- 7 no response

Preferred Sites

- New or existing structure whose primary use is not the generation of electricity
- Parking lot canopy or paved parking lot
- A tract previously developed for a use other than siting a plant on which a structure or impervious surface was lawfully in existence
- Brownfield site, Superfund site
- Landfill
- Disturbed portion of a gravel pit, quarry or other mineral resource extraction use
- Site identified in a town plan or in a joint letter of support of the town and RPC.

Action

 Should the regional plan (ECOS Plan) prohibit development in state and local constraint areas, or act in a more advisory role?



Overview of 3 options

Option C: A more general siting policy that supports appropriately scaled renewable energy generation on developed sites so long as it does not preclude infill development. Additionally, utility scale generation is encouraged where distribution and transmission infrastructure has adequate capacity; and impacts to state/local known and possible constraints are minimized. This Plan also strongly encourages energy generation on preferred sites. + A or B?

Option A: All development (note - not just renewable energy generation) **SHALL** not take place in areas with field-verified state or local known constraints, unless located on preferred sites. **Option B:** All development (note - not just renewable energy generation) **SHOULD** not take place in areas with field-verified state or local known constraints, unless located on preferred sites.



Extra Slides



Renewable Energy Target

Energy Demand Final Units

CCRPC 90 x 2050 Scenario Avoided vs. REF2 CCRPC Reference, Chittenden, All Tags



Electricity 1.8 mil MWh (2016) to 2.5 mil MWh (2050)



I.

Emily Nosse-Leirer

From:	front porch <frontporch@gmavt.net></frontporch@gmavt.net>
Sent:	Tuesday, July 18, 2017 12:26 PM
То:	Melanie Needle; 'Will Dodge'; 'Irene Wrenner'; 'Catherine McMains'; 'Jeff Forward'; 'Keith
	Epstein'; 'Jim Donovan'; 'Robin Pierce'; 'mburke'; 'Karen Purinton'
Cc:	Regina Mahony; Emily Nosse-Leirer; Marshall Distel; Charles Baker; Jen Dudley-Gaillard;
	Linda Baker; 'Amy Ludwin'; Amy Grover; Joss Besse
Subject:	RE: Energy Subcommittee Meeting Feedback re Known Local Constraints, Siting Policy
	Statement (Bolton)

I'm still not sure I'll be able to make this evening's meeting (depends on how late a project meeting runs). I'm submitting the following, more extensive comments re the meeting materials forwarded for review (known constraints and siting policy statements), in the event that I can't make it. I'll also be sure to raise some of these concerns (at least with respect to Bolton) at tomorrow's commission meeting ...

Known Local Siting Constraints

Why are we second guessing requested municipal input and guidance? As a member of the siting subcommittee, I have to object to the current listing of "known" local siting constraints as amended by RPC staff based on a cursory review of local regulations (particularly for Bolton) -- especially in the absence of any follow-up discussion or feedback from member municipalities. This is especially a concern if regional (and related municipal) targets can be met, while incorporating known constraints as initially defined by municipalities, given that:

- Known constraints, as intended to be defined locally under Act 174, were given due consideration at the municipal level in relation to current resource protection or other priorities which may or may not yet be reflected under current bylaws. Given this is a new area for everyone, current documents may not adequately identify local priorities or constraints specific to renewable energy development.
- While plans are considered by the PUC in 248 proceedings; bylaws are not (under related PUC rulings), given that municipalities do not have the authority to regulate generation and transmission facilities as forms of land development. As such any review of known constraints should be based on municipal plan policies (land conservation, resource protection, siting policies) rather than or in addition to municipal bylaws. At least in Bolton's case, there is no reference to related town plan policies—and given recent discussions locally regarding use of the plan in 248 and 250, I assume that stated land and resource conservation policies support the town's submitted list of known constraints...?
- Not all forms of development have equal magnitude or impact, and cannot be considered the same. As defined by staff, at least in Bolton's case, the exceptions have become the rule in determining what areas are off limits (or not) to *all* forms of development. For example, allowed encroachments associated with functionally dependent facilities and/or that are intended to address nonconformities or potential takings should not be extended to apply to all forms of development. Just because a bridge may be an allowed encroachment within a required stream setback, it doesn't mean that a solar collector should also then be allowed within required setbacks. Note too that the PUC previously defined logging roads as a form of development (even though exempt from local regulation) that they then used to justify/allow renewable energy facility siting within areas locally identified for protection. As a member of the Siting Task Force, this was the type of land use/siting conflict we were trying to avoid, by recommending that more weight be given to enhanced local and regional energy plans under A.174.

• This assumes that, other than bylaw provisions, no other restrictions (easements, deeds, etc.) apply.

With regard to Bolton, given our mountainous topography, we've intentionally defined uses, and listed noted exceptions under our regs specifically to avoid (rather than support) this type of conflation regarding allowed uses. As such, the regs should be applied in their entirety (full context) as intended and subsequently interpreted by the DRB, our town attorney and the courts. <u>We therefore once again ask that you include and map the following as "known" (rather than "possible") constraints</u>:

Wetland *Setback and Buffer Areas.* Not only "buffers" as noted, which we define and regulate separately from required setbacks. No development (structures, etc.) is allowed within these setback areas, which extend beyond required buffer areas.

Surface Water Setback and Buffer Areas. No new structures are allowed within defined surface water setbacks (which also overlay and, per consultation w/ANR, incorporate previously mapped FEHAs) and associated buffer areas. Allowed exceptions/encroachments include only functionally dependent facilities (e.g., stream crossings/bridges, boat accesses, stream stabilization projects)—as also allowed (if not as specifically stated) under other municipal bylaws and Act 250. Again, it should not be presumed from the list of specified exceptions/encroachments (subject to conditional use review) that other forms of development, including energy generation facilities, are also allowed.

Very Steep Slopes (> 25%). Per our cited regulations (and stated town plan policies), the DRB consistently <u>prohibits</u> new development –including land subdivisions resulting in new building lots-- on very steep slopes (>25%)—including any development that requires new roads or driveways (as included under the definition of "land development"). The stated exceptions to this include non-motorized ski, hiking and climbing trails, and a few grandfathered building lots in town (as recommended by our attorney to avoid takings claims, when first enacted). We do not allow any new building lots, access roads, driveways or new structures on very steep slopes (>25%), including telecom towers and ski lifts/towers. These (pads) have been allowed only on steep slopes (15-25%), as accessed by helicopter (Robbins Mt) or the one grandfathered existing service road/tower at BV (allowing for co-location). Similarly, under our regs, energy facilities (pads) could be sited on slopes of 15-25%, but not on slopes >25%--particularly if they require access via a new service road or driveway. Steep slopes, especially as they relate to road and driveway cuts (which conduct runoff), are a critical issue for us, particularly for stormwater management—one that we've taken very seriously since the regs were first enacted in 2005, successfully supported in a related, mediated court appeal, and in the context of several more recent and expensive road washouts.

Conservation District (*at minimum land above 2500', if not all public lands as defined under the regs***)**. See purpose statement, definitions for allowed uses, supplemental district standards, and related requirements (e.g., w/re to very steep slopes). Again listed uses include only existing, low impact or grandfathered uses as defined (ski trails at BV, co-located telecom facilities, hiking trails and primitive camping/GMC tent platforms, lean-tos) that may be accessed only on foot, by lift or by the existing service road at BV. These restrictions are intended to be applied in conjunction with steep slope provisions (no new roads, driveways), colocation requirements for telecom facilities, related land subdivision requirements, etc. They are also intended to protect headwaters and forest blocks (especially in the absence of associated Act 250 protections/state rules—see 4x4 Act 250 decisions) as well as significant natural communities (e.g., montane forest habitat) as recognized and protected by both the town and ANR under Act 250 (and presumably Section 248). A proposed commercial ridgeline wind project on Ricker Mountain has since been abandoned given early objections/concerns from the town and ANR re impacts to protected resources above 2500'.

Town-Owned <u>Conservation</u> Land (Preston Pond, Sarah Holbrook). As noted in our previous filing—not all town land/facilities should be included in this category (we support, and may pursue solar on town facilities), but conserved town lands should be included in known constraints—especially if the full Conservation District (all public land) is excluded. No new structures are allowed on conserved town land –per VLT and GMC easements, and associated access and deed restrictions. This is not solely at the Select Board's discretion, as stated.

Flood Hazard Overlay II – As noted, the only new development (structures) allowed in this district are functionally dependent (e.g., stream crossings/bridges) and small accessory structures (buildings) to existing principal structures per the NFIP definition and associated NFIP standards for small accessory structures— which do not, as defined (or intended), include or apply to renewable energy facilities. This district specifically excludes other forms of development regulated by the municipality.

Note too that the list of known and possible constraints provided by the town **has been reviewed by the Planning Commission and Select Board** (not just me) prior to submission, and will most likely be incorporated in our future enhanced municipal energy planning and mapping--consistent with our existing (and to be updated) regs and town plan policies--regardless of whether these are recognized at the regional level as local siting constraints. Given that, we'd prefer to avoid potential inconsistencies in the municipal and regional plan at this stage if possible.... I suspect this may also be true regarding known constraints initially identified by other municipalities, that were deleted from the list by RPC staff.

Plan Language

At the local level, Bolton's recommendation re "shall" language was reviewed by representatives of the Planning Commission and Select Board in a separate meeting – I should not be given sole credit (or responsibility) for this – as forwarded it included input from PC and SB reps.

Siting policies could also be crafted to avoid the issue of "shall" v. "should" v. "encourage"—to instead clearly identify and recognize known siting constraints (e.g., mapped exclusion areas), preferred locations, and best practices for facility siting and impact mitigation, specific to the type and location of the facility. Policy interpretation should also be informed/supported by the narrative (context) and associated maps.

Siting Policy Options

As stated, the three options presented seem overly simplistic. As a member of the Siting Task Force that helped develop A.174 recommendations, I'm disappointed that there's been no attempt to define regional siting constraints, preferred locations or substantial regional impacts (as anticipated in statute) beyond the collection of state and locally defined constraints (even more reason to keep those intact?), but I also understand that this reflects current regional planning policies and politics. It does call into question the whole purpose of this exercise, with regard to the intended use of and weight given to the regional plan in 248 proceedings. Should the regional plan simply adopt a siting policy that defers to the municipal plan (w/ re to constraints, preferred locations, etc.)? It seems, in effect, that this is the intent, especially under Options B and C. Given previous PUC findings and orders, these types of policy statements would likely be given no weight or consideration by the PUC in Section 248, undermining the intent of the planning process.

Also, given that municipalities are allowed to do their own energy planning, and may be granted separate party status, variation at the local level in meeting state (and regional) energy targets—including identifying local known constraints and preferred locations--was anticipated, specifically enabled, and should be

embraced, especially in the absence of any overriding regional siting policy. The same targets and plan compatibility requirements (as defined in Chapter 117, and under A.174 re certifications) still apply. In the absence of regional policy, there may well be some inconsistencies for projects that straddle or have impacts across town borders.

Option A, in some expanded form, seems more consistent with the intent of A.174, but as stated extends well beyond the scope of enhanced energy planning, as potentially also applied in Act 250 to other forms of development. This is also confusing at best, given the reference to locating facilities on preferred sites in areas of known constraint. At minimum some clarification is needed (e.g., for roof-mounted solar on existing buildings in floodplains?).

Re "not just renewable energy generation"... This takes the concept of "equal treatment" to the extreme --Renewable energy facility siting policies should not reference or necessarily apply to "all development" as stated—but should be consistent with related land and resource conservation policies that apply to other similar forms of development. Limitations/constraints that apply to renewable energy facility siting cannot and should not be assumed to apply to all forms of development- rather only to those forms of development of similar magnitude and impact, with similar locational requirements. Again, exceptions should not be used to define the rule, as noted above. In reality there are few (if any) 100% no build areas, even if these are stated as such—particularly under the statutory definition of land development that controls local development regulation. Limitations/constraints (and policies and regulations) typically also vary in relation to the type of renewable energy development proposed (wind v. solar) given differing technical and locational requirements and associated impacts. And I'm not sure that preferred sites for renewable energy generation also constitute preferred sites for dollar stores or shopping malls... Suggest, if taking this approach, instead (or in addition) developing regional resource protection, land conservation and development policies (as referenced in 248) that will inform both orderly development and facility siting in 248 and Act 250-which from a planning standpoint will likely also include considerations and/or constraints beyond those identified only with regard to energy facility siting.

Field verification of mapped information is typically required as a matter of course, as part of the development review process, and it's appropriate to clearly state this in the plan and on associated maps, but I would not embed this directly in a facility siting policy statement—rather include in a series of policy statements specific to the type of facility and/or location, once the overall approach/option is defined?

Hope to participate in the discussion this evening...would certainly help my understanding of the materials forwarded for review. If not I'll see you tomorrow!

Sharon

Sharon Murray Bolton Select Board 802.434.4118 frontporch@gmavt.net

From: Melanie Needle [mailto:mneedle@ccrpcvt.org]
Sent: Friday, July 14, 2017 4:43 PM
To: Will Dodge; Irene Wrenner; Catherine McMains; Jeff Forward; Keith Epstein; Jim Donovan (jdonovan@gmavt.net);
Robin Pierce; mburke; front porch; Karen Purinton

Cc: Regina Mahony; Emily Nosse-Leirer; Marshall Distel; Charles Baker **Subject:** RE: Energy Subcommittee Meeting July 18

Energy Sub-Committee Members,

The meeting packet can be downloaded at the following link: <u>http://www.ccrpcvt.org/wp-content/uploads/2016/09/EnergySubCommitteePacket_20170718.pdf</u>

See you Tuesday at 5 pm.

Best, Melanie

Melanie Needle Senior Planner Chittenden County Regional Planning Commission 110 West Canal Street, Suite 202 Winooski, VT 05404 (802) 846-4490 ext. *27



CHITTENDEN COUNTY RPC Communities Planning Together

From: Melanie Needle

Sent: Tuesday, July 11, 2017 3:34 PM To: 'Will Dodge' <<u>wdodge@drm.com</u>>; Irene Wrenner <<u>imwren@aol.com</u>>; 'Catherine McMains' <<u>catherine.mcmains@gmail.com</u>>; Jeff Forward <<u>jeffrey.w.forward@gmail.com</u>>; Keith Epstein <<u>keithepstein@gmail.com</u>>; Jim Donovan (<u>jdonovan@gmavt.net</u>) <<u>jdonovan@gmavt.net</u>>; 'Robin Pierce' <<u>robin@essexjunction.org</u>>; mburke <<u>burke00@yahoo.com</u>>; 'front porch' <<u>frontporch@gmavt.net</u>>; 'Karen Purinton' <<u>KPurinton@colchestervt.gov</u>> Cc: Regina Mahony <<u>rmahony@ccrpcvt.org</u>>; Emily Nosse-Leirer <<u>enosse-leirer@ccrpcvt.org</u>>; Marshall Distel <<u>mdistel@ccrpcvt.org</u>>; 'Charles Baker' <<u>cbaker@ccrpcvt.org</u>> Subject: Energy Subcommittee Meeting July 18

To Energy Sub-Committee Members,

Friendly reminder that we are schedule to meet next Tuesday July 18th at 5 pm. I will send the meeting packet by the end of the week. Please let me know if you are not able to attend next week's meeting.

Best, Melanie

Melanie Needle Senior Planner Chittenden County Regional Planning Commission 110 West Canal Street, Suite 202 Winooski, VT 05404 (802) 846-4490 ext. *27



Siting Policy Options	Pros	Cons	Quest/Points (not necessarily a pro/con):
Option A: All development (note - not just renewable energy generation) <u>SHALL</u> not take place in areas with field-verified state or local known constraints, unless located on preferred sites.	Support specific local resource protections already in place (a.k.a. "known constraints") while meeting our renewable energy generation targets. For example, Essex's zoning regulations strictly prohibit development on slopes over 20%. By including that protected resource in our Plan, we would support Essex's efforts to protect that resource at the Public Utilities Commission for energy generation facilities.	We would have inconsistent "rules" from one municipality to the next.	These constraint areas would become "no build" areas for all development, not just renewable energy facility areas.
	This would only include resources strictly protected in existing municipal regulations, for that municipality. We would not impose these resource protection measures that exist in some municipalities on the rest of the municipalities.	While we can meet our target, it does create a road block for energy facility generation.	We'd protect the state's list of known constraints as well?
	We have approximately 7 municipalities with strict resource protection regulations that are truly identifying 100% no build areas.	It would make the ECOS Plan more of a regulatory document than it's been in the past; and Act 250 is at the 11 th hour for some developments so our input is coming late and we run the risk of being inconsistent with what has already been approved by the Town because there are a lot of nuances that get worked out through zoning and development review.	As the municipal plans get updated, and they change their "no build" areas we'd have to amend our Plan or state in the ECOS Plan that we will defer to the local plans as approved by CCRPC.
	By supporting these municipalities we would provide the service of protecting these resources at the Public Utilities Commission before the municipalities have a chance to update their Plans and gain the certification necessary to participate on their own. This would provide (a few) municipalities with the substantial deference without having to write their own plans. We'd testify on a case by case basis to the policy language that exists at the municipal level and our regional plan.	We'd have to dedicate more time to Act 250 and Section 248 reviews to support the policies in place; however, we do not anticipate that we would need to become experts on the resources.	
	Clear directive to the Public Utilities Commission		
Option B : All development (note - not just renewable energy generation) <u>SHOULD</u> not take place in areas with field-verified state or local known constraints, unless located on preferred sites.	Similar to our current non-regulatory role, and keeps the ECOS Plan a plan.	More pressure on the municipalities to do this planning work, if they want substantial deference in the Public Utilities Commission for energy generation developments.	Would we still play a bigger role in Act 250 and Section 248?
	Identifies constraints as red flags, but not a 100% no build road block for renewable energy generation facilities (or any development for that matter).	Less clear directive for the Public Utilities Commission.	
	Still inconsistent between the municipalities, but since it isn't a rule it will be easier to implement.		
	Likely easier to maintain local plan compatibility with the ECOS Plan as the local plans get updated for energy planning purposes.		
Option C: A more general siting policy that supports appropriately scaled renewable energy generation on developed sites so long as it does not preclude infill development. Additionally, utility scale generation is encouraged where distribution and transmission infrastructure has adequate capacity; and impacts to state/local known and possible constraints are minimized. This Plan also strongly encourages energy generation on preferred sites.	Similar to our current non-regulatory role, and keeps the ECOS Plan a plan.	More pressure on the municipalities to do this planning work, if they want substantial deference in the Public Utilities Commission for energy generation developments.	In practice is this any different than Option B?
	Likely easier to maintain local plan compatibility with the ECOS Plan as the local plans get updated for energy planning purposes.	Less clear directive for the Public Utilities Commission.	Do we still have to include the state known and possible constraints?