

## Planning Commission Comments to Public Service Board

Many of you are aware that the Planning Commission spent much of its summer grappling with VELCO/CVPS's proposal to locate a new electrical substation and connector line in Dummerston. The proposal, the town's negative response to it, and the resulting amended proposal from VELCO/CVPS received full coverage in *The Reformer*. On September 14, the Planning Commission filed its comments on both the original proposal and the amendment with the Vermont Public Service Board, the regulatory body responsible for approving VELCO/CVPS's plan. Attached to these official comments were individual comments from affected land owners, members of the Conservation Commission, concerned residents, and a legislative representative.

In the interest of full public process and involvement, the Planning Commission is taking this opportunity to share with you the comments it filed with the Public Service Board.

*The following are the comments of the Dummerston Planning Commission on the VELCO/CVPS Petition for Certificate of Public Good for the Southern Loop Transmission Upgrade Project, to be filed September 26, 2007.*

### **BACKGROUND**

*The Dummerston Planning Commission (DPC) first learned about the petition for the Upgrade Project in late June, from the 45-day notice filed by VELCO and CVPS in early June. The DPC was not involved in any of the community working groups organized by VELCO/CVPS that led up to the petition, and was unaware of the extent of the petition's impact on Dummerston until it received the filing.*

*The DPC determined it necessary to submit comments to the petition by the filing deadline of July 25, 2007. In particular, the DPC was concerned that the route of the proposed Dummerston Loop cut through an ecologically sensitive, unfragmented tract of forested wildlife habitat known as Camp Arden. The Camp Arden property borders on the West River and has been identified by the town as a cultural resource. Based on its concerns and the negative reaction of town residents to the petition, the DPC convened a public hearing on July 11, 2007. The hearing included representatives from VELCO and CVPS, and representatives from the Vermont Department of Public Service were in attendance. At the hearing, the DPC asked clarifying questions of these representatives, and suggested that VELCO/CVPS delay its filing until the numerous issues raised by both the DPC and the public could be addressed. VELCO agreed the next day to delay its filing until September 26, 2007.*

*Subsequently, a DPC subcommittee met with VELCO representatives to discuss alternatives to the proposed Dummerston Loop and substation locations. The DPC subcommittee suggested four alternative routes/locations within Dummerston, all of which seemed to cause less adverse impact than the original VELCO proposal.*

*As a result of these meetings, VELCO identified its own alternative route. In a letter to the DPC dated August 24, 2007, VELCO stated "as a result of our investigation and a number of meetings with local officials, we will propose to locate the substation at a former gravel pit . . . located off of Route 30 in the Town of Newfane. In order to tie in with the substation, we would need to extend two new 345 kV lines (to form the "loop")*

*for approximately one mile from Dummerston into the Newfane substation site, utilizing the existing CVPS 46 kV transmission line corridor.”*

### **DPC COMMENTS ON THE ORIGINAL PETITION**

*VELCO/CVPS’s original petition for the Dummerston Loop and expansion of the West Dummerston substation conflicted substantially with Town Goals and Policies as set forth in the Dummerston Town Plan adopted August 11, 2004. Specifically:*

- 1. Dummerston Goal #15 is “to protect significant natural areas and locations of special educational, scientific, historical, architectural, archeological and scenic significance.” The Camp Arden property meets these criteria.*
- 2. Dummerston Goal #16 is “to encourage and support the continued use of lands for agricultural, forestry, wildlife habitat and diversified recreation.” The Camp Arden property is a large parcel of unfragmented forest that supports a wide range of wildlife. It is also used for educational and recreational purposes by town residents.*
- 3. Energy Element, Policy #6 is to “[l]ocate energy generation facilities and transmission corridors to minimize impact on the environment and on historic, recreational and scenic facilities and sites.” The proposed Dummerston Loop corridor would have a significant adverse impact on unfragmented forest land that supports a rich array of wildlife. The Camp Arden property is an historic, recreational and scenic site.*
- 4. Wildlife Resources Element, Policy # 1 is “[w]hen development is being carried out, fragmentation of forest blocks should be minimized, connecting links between such blocks should be maintained, and existing road systems should be used.” The proposed Dummerston Loop would fragment one of the town’s larger forest blocks.*
- 5. Wildlife Resources Element, Policy # 2 is that “[d]eer wintering areas should be protected from development and other uses that threaten the ability of this habitat to support deer.” The Camp Arden property is an established deer wintering area.*
- 6. Wildlife Resources Element, Policy # 3 is that “[r]are and endangered plants and animals, and natural communities, should be protected and preserved.” Several state-listed threatened and endangered plants are found along the stretch of the West River crossed by the proposed Loop. Populations of two endangered invertebrates are also found in that part of the river. Three species of birds ranked “special concern” have been recorded by the Vermont Breeding Bird Atlas on the Camp Arden property. These are species that require unfragmented forest habitat.*

7. *Forestry Element, Policy # 3 is that “[f]ragmentation of Dummerston forests should be minimized when new development is planned.” The proposed Dummerston Loop would fragment one of the town’s larger forest blocks.*
8. *The Cultural Resources Element lists Camp Arden as a Cultural Resource. Cultural Resources Policy # 1 is that “Cultural Resources shall be used and treated in a manner that will enhance, and not depreciate, the value of the site or area. “*
9. *Cultural Resources Element, Policy # 3 is that “[d]evelopment or actions that would adversely affect historic structures and sites, including their destruction or alteration, or the introduction of non-harmonious elements, is discouraged.”*
10. *Surface Waters Element, Policy # 2 is that “[c]ontinuous areas of undisturbed vegetation along rivers and streams should be encouraged, thereby protecting shorelines, wildlife habitat, and scenic quality.” The proposed Loop would impact the shoreline of the West River and would remove tree cover from the banks of a stream running through the Camp Arden property.*
11. *Surface Waters Element, Policy # 3 is that “[n]ew development within or adjacent to shoreland areas must be designed to stabilize river and stream banks and cause minimal damage to the stream environment. Any such development should be so conducted that surface waters do not become silted, contaminated, or otherwise degraded.” The stream crossed by the proposed Loop has high sloping banks and flows through relatively soft sediments. Erosion of these banks would cause siltation in the stream and impact the West River as well.*

**DPC COMMENTS ON THE AMENDED PROPOSAL**

*The DPC agrees with VELCO, based on the information provided to date, that the amended substation location (Newfane) and connector route, as proposed, is a better alternative than the original petition, and does not present significant conflicts with the Dummerston Town Plan.*

*It is important to note that the DPC’s support of the amended proposal is not due to the relocation to another town, but rather due to the fact that there are clearly fewer adverse impacts from the proposed Newfane location than from any other location that has been discussed.*

**DPC COMMENTS ON THE VY-COOLIDGE 345 kV TRANSMISSION LINE**

*The DPC supports the demand-side measures outlined in VELCO’s filing to manage the energy load concerns and encourages energy conservation efforts that reduce the need for system expansion.*

*The DPC appreciates the opportunity to comment to the Public Service Board on this petition. The DPC also commends VELCO/CVPS for their willingness to work closely with the Town to lessen the adverse impacts of their original petition.*