Energy Planning Standards for Regional Plans

Instructions

Before proceeding, please review the requirements of Parts I and II below, as well as the Overview document. Submitting a Regional Plan for review under the standards below is entirely voluntary, as enabled under Act 174, the Energy Development Improvement Act of 2016. If a Regional Plan meets the standards, it will be given an affirmative "determination of energy compliance," and will be given "substantial deference" in the Public Service Board's review of whether an energy project meets the orderly development criterion in the Section 248 process. Specifically, with respect to an in-state electric generation facility, the Board:

> *[S]hall give substantial deference to the land conservation measures and specific policies contained in a duly adopted regional and municipal plan that has received an affirmative determination of energy compliance under 24 V.S.A. § 4352. In this subdivision (C), "substantial deference" means that a land conservation measure or specific policy shall be applied in accordance with its terms unless there is a clear and convincing demonstration that other factors affecting the general good of the State outweigh the application of the measure or policy. The term shall not include consideration of whether the determination of energy compliance should or should not have been affirmative under 24 V.S.A. § 4352*

Regional Plans may be submitted to the Department of Public Service (DPS) for a determination of energy compliance (determination), along with the completed checklist below. After a Regional Plan and completed checklist have been submitted to DPS, DPS will schedule a public hearing noticed at least 15 days in advance by direct mail to the requesting regional planning commission, on the DPS website, and in a newspaper of general publication in the region. The Commissioner of DPS shall issue a determination in writing within two months of the receipt of a request. If the determination is negative, the Commissioner shall state the reasons for the denial in writing and, if appropriate, suggest acceptable modifications. Submissions for a new determination following a negative determination shall receive a new determination within 45 days.

The plans that Regions submit must:

- Be adopted
- Include the energy element as described in 24 V.S.A. § 4348a(a)(3)
- Be consistent with state energy policy (described below), in the manner described in 24 V.S.A. § 4302(f)(1)
- Meet all standards for issuing a determination of energy compliance (see below)

Regions are encouraged to consult with DPS before undertaking the process of plan adoption, which may help in identifying any deficiencies or inconsistencies with the standards or other requirements that would be more difficult to remedy after a plan has gone through the formal adoption process.

The state's Comprehensive Energy Plan (CEP) is revised on a 6-year basis. When the next CEP is published in 2022, it will include a revised set of standards, as well as Recommendations that are customized to regions and municipalities. The Recommendations that accompany this initial set of Standards represent a subset of recommendations from the 2016 CEP, which were not written with regions and municipalities specifically in mind. A Guidance document – which is expected to evolve as best practices from regions and municipalities emerge – will be published shortly after the Standards are issued. It will serve as the

warehouse for relevant recommendations from the 2016 CEP, links to data sources, instructions on conducting analysis and mapping, and sample language/best practices. Once issued and until the 2022 CEP is published, this Guidance document will supplant the Recommendations document.

Affirmative determinations last for the life cycle of a revision of the Regional Plan, and Regional Plans that are submitted after the 2022 CEP is issued will be expected to meet the Standards that are issued at that time. Regions are encouraged to consult with DPS regarding interim amendments that might affect any of the standards below, to discuss whether a new review is triggered.

If you wish to submit your Regional Plan to DPS for a determination, please read closely the specific instructions at the start of each section below, and attach your Regional Plan to this checklist.

Determination requests and any other questions should be submitted to: PSD.PlanningStandards@vermont.gov.

Part I: Applicant Information

Applicant:	Addison County Regional Planning Commission
Contact person:	Adam Lougee
Contact information:	alougee@acrpc.org
Received by:	**Date:**

Part II: Determination Standards Checklist

The checklist below will be used to evaluate your plan's consistency with statutory requirements under Act 174, including the requirement to be adopted, contain an enhanced energy element, be consistent with state energy policy, and meet a set of standards designed to ensure consistency with state energy goals and policies.

Please review and attach your plan (or adopted energy element/plan, along with supporting documentation) and self-evaluate whether it contains the following components. Use the Notes column to briefly describe how your plan is consistent with the standard, including relevant page references (you may include additional pages to expand upon Notes). If you feel a standard is not relevant or attainable, please check N/A where it is available and use the Notes column to describe the situation, explaining why the standard is not relevant or attainable, and indicate what measures your region is taking instead to mitigate any adverse effects of not making substantial progress toward this standard. If N/A is not made available, the standard must be met (unless the instructions for that standard indicate otherwise) and checked "Yes" in order to receive an affirmative determination. There is no penalty for checking (or limit on the number of times you may check) N/A where it is available, as long as a reasonable justification is provided in the Notes column.

Plan Adoption Requirement

Act 174 requires that regional plans be adopted in order to qualify for a determination of energy compliance. In the near term, it is likely regions will revise and submit isolated energy plans or elements, particularly due to long planning cycles. Therefore, the plan adoption requirement can be met through an amendment to an existing plan in the form of an energy element or energy plan, as long as the amendment or plan itself is duly adopted as part of the regional plan and incorporated by reference or appended to the underlying, full plan (i.e., is officially "in" the regional plan). If this route is chosen, regions should also provide a memo that discusses the internal consistency of the energy plan/element with other related elements of the underlying plan (particularly Transportation and Land Use), and/or whether the energy plan/element supersedes language in those other elements. Standards 1 and 2 below must be answered in the affirmative in order for a plan to receive an affirmative determination of energy compliance.

1. Has your plan been duly adopted?	☒ Yes Adoption: July 17, 2018	☐ No	ACRPC adopted its new Energy Plan on July 17, 2018. The plan became final 35 days after adoption on August 23, 2018.
2. Is a copy of the plan (or adopted energy element/plan, along with underlying plan and memo addressing consistency of energy element/plan with other elements of underlying plan) attached to this checklist?	☒ Yes	☐ No	

Energy Element Requirement

To obtain a determination of energy compliance, Act 174 requires regions to include an "energy element," revised through Act 174 to explicitly address energy across all sectors and to identify potential and unsuitable areas for siting renewable energy resources, as described in 24 V.S.A. § 4348a(a)(3):

> *An energy element, which may include an analysis of resources, needs, scarcities, costs, and problems within the region across all energy sectors, including electric, thermal, and transportation; a statement of policy on the conservation and efficient use*

of energy and the development and siting of renewable energy resources; a statement of policy on patterns and densities of land use likely to result in conservation of energy; and an identification of potential areas for the development and siting of renewable energy resources and areas that are unsuitable for siting those resources or particular categories or sizes of those resources.

The standards below are generally organized to integrate each component of the enhanced energy element with related determination standards that evaluate the plan's consistency with state goals and policies. **Energy element components are identified in bolded text.**

While regions may choose to primarily address energy used for heating, transportation, and electricity in the required energy element, they may also choose to address some of these components in related plan elements (e.g., Transportation and Land Use) and should indicate as much in the Notes column. To the extent an energy element is designed to comprehensively address energy, it should be complementary to and reference other relevant plan elements.

3. **Does the plan contain an energy element, as described in 24 V.S.A. § 4348a(a)(3)?** *Individual components of the energy element will be evaluated through the standards below.*	■ Yes	☐ No	Page: The Energy Element is Sub-Section 7.2 of the Regional Plan. The Energy Element meets the description written above.

Consistency with State Goals and Policies Requirement

Act 174 states that regional and municipal plans must be consistent with the following state goals and policies:

- Greenhouse gas reduction goals under 10 V.S.A. § 578(a) (50% from 1990 levels by 2028; 75% by 2050)
- The 25 x 25 goal for renewable energy under 10 V.S.A. § 580 (25% in-state renewables supply for all energy uses by 2025)
- Building efficiency goals under 10 V.S.A. § 581 (25% of homes – or 80,000 units – made efficient by 2020)
- State energy policy under 30 V.S.A. § 202a and the recommendations for regional and municipal planning pertaining to the efficient use of energy and the siting and development of renewable energy resources contained in the State energy plans adopted pursuant to 30 V.S.A. §§ 202 and 202b
- The distributed renewable generation and energy transformation categories of resources to meet the requirements of the Renewable Energy Standard under 30 V.S.A. §§ 8004 and 8005

The standards in the checklist below will be used to determine whether a plan is consistent with these goals and policies. The standards are broken out by category. *Analysis and Targets* standards address how energy analyses are done within plans, and whether targets are established for energy conservation, efficiency, fuel switching, and use of renewable energy across sectors. *Pathways (Implementation Actions)* standards address the identification of actions to achieve the targets. *Mapping* standards address the identification of suitable and unsuitable areas for the development of renewable energy.

Regions may choose to incorporate the information necessary to meet the standards in their energy elements, and/or in other sections of their plans (many transportation items may fit best in the Transportation chapters of plans, for instance). However, plans must be internally consistent, and applicants should cross-reference wherever possible.

Analysis and Targets Standards

For the analysis determination standards below, regions are expected to develop their own analysis (already underway through support being provided to regions by DPS), and to then break out the analysis for their municipalities, who can use their region-provided analysis to meet the municipal *Analysis & Targets* standards (such "municipalization" work is being supported through a contract between DPS and regions, and all regions must supply completed analyses to their municipalities by April 30, 2017, though many are expected to do so much sooner).

DPS is providing a guidance document to explain the expected level of detail in and data sources and methodologies available for meeting the *Analysis & Targets* standards below. Note that standards 4A-4E are all derived directly from requirements in Act 174 (with minor modifications to make them feasible) and must be met affirmatively in order for a regional plan to receive an affirmative determination of energy compliance. Standard 5 is also required and addresses "municipalization" of analysis and targets; regions should check "Yes" if they have or if they have a plan to supply this information to their municipalities.

Targets set by regions should be aligned with state energy policy (see the goals and policies listed above). Where targets (and efforts to reach them) depart significantly from state energy goals and policies, an explanation for how the plan otherwise achieves the intent of the state goal or policy should be provided. The guidance document also offers additional clarification on alignment with state goals and policies.

The analysis items below are intended to provide regions with an overview of their current energy use, and with a sense of the trajectories and pace of change needed to meet targets, which can be translated into concrete actions in the *Pathways* standards below. Targets provide regions with milestones or checkpoints along the way toward a path of meeting 90% of their total energy needs with renewable energy, and can be compared with the potential renewable energy generation from areas identified as potentially suitable in the *Mapping* standards exercise below to give regions a sense of their ability to accommodate renewable energy that would meet their needs.

4. **Does your plan's energy element contain an analysis of resources, needs, scarcities, costs, and problems within the region across all energy sectors (electric, thermal, transportation)?**	■ Yes	□ No	Page: An analysis of resources, needs, scarcities, costs, and problems within the region are described in each of the energy sectors (sections B, C, D and E)
A. Does the plan estimate current energy use across transportation, heating, and electric sectors?	■ Yes	□ No	Pages: The Plan estimates current energy use on pages 41, 44, 53 and 61 in Tables 5, 6, 8 and 11. Paragraph #:
B. Does the plan establish 2025, 2035, and 2050 targets for thermal and electric efficiency improvements, and use of renewable energy for transportation, heating, and electricity?	■ Yes	□ No	Pages: The Plan establishes targets on pages 45, 54 and 62 in Tables 7, 9 and 12 Paragraph #:
C. Does the plan evaluate the amount of thermal-sector conservation, efficiency, and conversion to alternative heating fuels needed to achieve these targets?	■ Yes	□ No	Pages: The Plan addresses thermal sector conservation, efficiency and conversion on pages 45

			– 47 in tables 7A- 7D. Paragraph #:
D. Does the plan evaluate transportation system changes and land use strategies needed to achieve these targets?	■ Yes	□ No	Pages: The plan evaluates transportation system changes on pages 62-65, Tables 12A-12C. Transportation strategies are discussed further in Section 4, the Transportation Section of the Plan. Section E beginning on page 66 covers land use strategies. Specific strategies are listed on page 100-101 and in Section 8 of the Plan governing Future Land Use. Paragraph #:_____
E. Does the plan evaluate electric-sector conservation and efficiency needed to achieve these targets?	■ Yes	□ No	Pages: The Plan addresses electric Section Conservation and efficiency on pages 54-59 and in Table 9 Paragraph #:_

5. Has your region provided (or do you have a plan to provide) a breakout of the analyses and targets above to your municipalities? *Please explain your timeline for completing this task in the Notes column.*	■ Yes	□ No	Pages 70 and 91, Tables 14 and 19 breakout analyses and targets for each municipality in the Region. Additionally, all municipal planning commissions were given complete breakout data for their municipality.

Pathways (Implementation Actions) Standards

This section examines whether plans meet the Act 174 expectation that they include pathways and recommended actions to achieve the targets identified through the *Analysis and Targets* section of the Standards (above). Plans are expected to include or otherwise address all of the pathways (implementation actions) below, unless N/A is provided as an option. There is no penalty for choosing N/A one or more times, as long as a reasonable justification is provided in the Notes column, preferably including an explanation of how the plan alternatively achieves attainment of the targets should be included. If N/A is not provided as an option, the plan must meet the standard, and "Yes" must be checked, in order for the plan to meet the requirements for a determination (unless the instructions particular to that standard indicate otherwise).

DPS will be issuing a guidance document in the near term providing potential implementation actions derived from the Comprehensive Energy Plan (relevant formal Recommendations as well as opportunities not specifically called out as Recommendations), from recent regional plans, and from other sources. For the time being, we offer potential starting points for consideration as italicized text under each standard. Plans are encouraged to promote as diverse a portfolio of approaches as possible in each sector, or if not, to explain why they take a more targeted approach. Implementation actions may fit best in a holistic discussion contained within a plan's energy element, though cross-referencing to other relevant plan elements is also acceptable.

Regions must demonstrate a commitment to achieving each standard in both policies and implementation measures in clear, action-oriented language.

6. **Does your plan's energy element contain a statement of policy on the conservation and efficient use of energy?**	■ Yes	□ No	Page: Policies regarding conservation and efficient use of energy are highlighted throughout the entirety of the element.
A. Does the plan encourage conservation by individuals and organizations? *(Actions could include educational activities and events such as convening or sponsoring weatherization workshops, supporting local energy committees, encouraging the use of existing utility and other efficiency and conservation programs and funding sources, etc.)*	■ Yes	□ No	Pages: Pages 45 and 46 discuss specific conservation and efficiency actions for individuals/organizations

B. Does the plan promote efficient buildings? *(Actions could include education on and promotion of residential and commercial building energy standards for new construction and existing buildings, including additions, alterations, renovations and repairs; promoting the implementation of residential and commercial building efficiency ratings and labeling; assistance to municipalities considering adopting stretch codes, etc.)*	■ Yes	□ No	Page: Sections B and C of the Plan address the Region's support of efficient buildings; specifically pages 45-46 and 55-58 list actions
C. Does the plan promote decreased use of fossil fuels for heating? *(Actions and policies could promote switching to wood, liquid biofuels, biogas, geothermal, and/or electricity. Suitable devices include advanced*	■ Yes	□ No	Page: Pages 45 and 46 promote the decreased use of fossil fuels.

wood heating systems and cold-climate heat pumps, as well as use of more energy efficient heating systems; and identifying potential locations for, and barriers to, deployment of biomass district heating and/or thermal-led combined heat and power systems in the region)			
D. Other (please use the notes section to describe additional approaches that your region is taking)	□ Yes	■ No □ N/A	Page: Approaches were outlined by standards
7. Does your plan's energy element contain a statement of policy on reducing transportation energy demand and single-occupancy vehicle use, and encouraging use of renewable or lower-emission energy sources for transportation?	■ Yes	□ No	Page: Page 63, Goal B contains these statements. Paragraph #: 3,
A. Does the plan encourage increased use of public transit? *(Actions could include working with public transit providers and other stakeholders to identify and develop new public transit routes, promote full utilization of existing routes, integrate park-and-rides with transit routes, etc.)*	■ Yes	□ No	Page: Page 64, Policy 2, addresses public transit Paragraph #:
B. Does the plan promote a shift away from single-occupancy vehicle trips through strategies appropriate to the region? *(Actions could include facilitation of rideshare, vanpool, car-sharing initiatives; efforts to develop or increase park-and-rides; enhancement of options such as rail and telecommuting; education; intergovernmental cooperation; or assistance with grants related to any of the above, etc.)*	■ Yes	□ No	Page: Pages 63-64 Goal B, Policies 1 and 2 promote a shift away from single occupancy vehicles. Paragraph #:
C. Does the plan promote a shift away from gas/diesel vehicles to electric or other non-fossil fuel transportation options through strategies appropriate to the region? *(Actions could include installing or promoting the installation of electric vehicle charging infrastructure, providing education and outreach to potential users, supporting electric and non-fossil fuel vehicle availability through outreach to vehicle dealers, etc.)*	■ Yes	□ No	Page: Page 63, Goal A promotes a shift away from gas vehicles. Paragraph #:
D. Does the plan facilitate the development of walking and biking infrastructure through strategies appropriate to the region? *(Actions could include studying, planning for, seeking funding for, or implementing improvements that encourage safe and convenient walking and biking; adopting a "Complete Streets" policy, etc.)*	■ Yes	□ No	Page: Page 63, Goal B facilitates the development of walking and biking infrastructure. Paragraph #:
E. Other (please use the notes section to describe additional approaches that your region is taking)	■ Yes	□ No □ N/A	Page: Page 64, Goal C Freight and Rail; and Goal D goal to support agricultural industry for biodiesel production Paragraph #:

8. **Does your plan's energy element contain a statement of policy on patterns and densities of land use likely to result in conservation of energy?**	■ Yes	□ No	Page: Page 101, Goal B contains statements of policy on land use patterns. Paragraph #:_____

A. Does the plan include land use policies (and descriptions of current and future land use categories) that demonstrate a commitment to reducing sprawl and minimizing low-density development? *(Actions could include promoting limited sewer service areas, maximum building sizes along highways, policies or zoning that require design features that minimize the characteristics of strip development [multiple stories, parking lot to the side or back of the store], requirements that development in those areas be connected by means other than roads and cars, etc.)*	■ Yes	□ No	Page: Page 101 describes specific policies and actions for reducing sprawl and promoting compact development.
B. Does the plan strongly prioritize development in compact, mixed-use centers when physically feasible and appropriate to the use of the development, or identify steps to make such compact development more feasible? *(Actions could include promoting and assisting with municipal participation in the state designation programs; facilitating the exploration of water or sewage solutions that enable compact development; etc.)*	■ Yes	□ No	Page: Page 101 prioritizes development in compact developments. Please also see the Future Land Use section of the Plan, Section 8
C. Other (please use the notes section to describe additional approaches that your region is taking)	□ Yes	■ No ■ N/A	Page: Approaches described by standards Paragraph #:
9. **Does your plan's energy element contain a statement of policy on the development and siting of renewable energy resources?**	■ Yes	□ No	
A. Does the plan evaluate (estimates of or actual) generation from existing renewable energy generation in the region, and break this information out by municipality?	■ Yes	□ No	Page: Table 14, page 70, addresses current renewable generation in the region and breaks out the information by municipality.
B. Does the plan analyze generation potential, through the mapping exercise (see *Mapping* standards, below), to determine potential from preferred and potentially suitable areas in the region, and break this information down by municipality?	■ Yes	□ No	Page: Starting on page 72-92, this section identifies generation potential and specifically breaks out potential by municipality in Table 19 on page 91.
C. Does the plan identify sufficient land in the region for renewable energy development to reasonably reach 2050 targets for renewable electric generation, based on population and energy resource potential (from potential resources identified in the *Mapping* exercise, below), accounting for the fact that land may not be available due to private property constraints, site-specific constraints, or grid-related constraints?	■ Yes	□ No	Page: Pages 82-92 describe land in the region available for renewable energy development. Each type of generation identifies

			land in the region needed for the generation targets.
D. Does the plan ensure that any regional or local constraints (regionally or locally designated resources or critical resources, from 11B and 11C under *Mapping*, below) do not prohibit or have the effect of prohibiting the provision of sufficient renewable energy to meet state, regional, or municipal targets?	■ Yes	□ No	Page: Pages 82-92 discusses constraints and maps. Table 17 on page 90 and the text on page 91 discuss the total number of potential renewable resource generation given available land. The theoretical amount of power that could be generated from available land dwarfs state, regional and municipal targets.

E. Does the plan include statements of policy to accompany maps (could include general siting guidelines), including statements of policy to accompany any preferred, potential, and unsuitable areas for siting generation (see 11 and 12 under *Mapping*, below)?	■ Yes	□ No	Page: Pages 93-99 describe policies regarding areas for new generation siting
F. Does the plan maximize the potential for renewable generation on preferred locations (such as the categories outlined under 11E in the *Mapping* standards, below)?	■ Yes	□ No □ N/A	Page: The Siting Standards on Pages 93 and 95 identify preferred areas as good sites for generation.
G. Other (please use the notes section to describe additional approaches that your region is taking)	□ Yes	□ No □ N/A	Approaches identified were specified in standards

Mapping Standards

Act 174 requires plans to identify potential areas for the development and siting of renewable energy resources and areas that are unsuitable for siting those resources or particular categories or sizes of those resources. It furthermore requires that the standards address the potential generation from the potential siting areas. Lastly, it requires that – in order to receive an affirmative determination – regional plans allow for the siting in the region of all types of renewable generation technologies.

The *Mapping* standards lay out a sequence of steps for planners to examine existing renewable resources and to identify potential (and preferred) areas for renewable energy development, and to identify likely unsuitable areas for development, by layering constraint map layers on to raw energy resource potential map layers. The maps should help regions visualize and calculate the potential generation from potential areas, and compare it with the 2025, 2035, and 2050 targets from the *Analysis and Targets* standards to get a sense of the scale and scope of generation that could be produced within the region to meet the region's needs. DPS will provide additional guidance to accompany the standards that fleshes out the steps, layers, and standards more fully.

Plans must include maps that address all of the standards below, unless N/A is provided as an option, in which case a compelling reason why the standard is not applicable or relevant should be provided in the Notes column. Regions must develop their own maps (already underway through support being provided to regions by DPS), and to then break out the maps for their municipalities, who can use their region-provided maps to meet the municipal *Mapping* standards (such "municipalization" work is being supported through a contract between DPS and regions, and all regions must supply completed maps to their municipalities by April 30, 2017, though many are expected to do so much sooner).

The map and the text describing the policies or rules used to construct the map, as well as the text describing specific policies applicable to map features, should be complementary. That should help ensure that any "land conservation measures and specific policies" that might be given substantial deference in the context of a particular project review under 30 V.S.A. § 248 are clearly identifiable in the text, should a map lack sufficient clarity or granularity regarding the area in which a project is proposed.

10. Does the plan identify and map existing electric generation sources? *Maps may depict generators of all sizes or just those larger than 15 kW, as long as information on generators smaller than 15 kW is summarized and provided or*	■ Yes	□ No	Page: Map 2 on Page 71 identifies existing generation resources.

referenced elsewhere. It is expected that the best available information at the time of plan creation will be used. This information is available from the DPS.			
11. **Does the plan identify potential areas for the development and siting of renewable energy resources** and the potential generation from such generators in the identified areas, taking into account factors including resource availability, environmental constraints, and the location and capacity of electric grid infrastructure? *Maps should include the following (available from VCGI and ANR), and the resulting Prime and Secondary Resource Maps will together comprise "potential areas":*	■ Yes	□ No	Page: Maps 6, 7 and 8 on pages 87-89 respectively identify potential areas for the development and siting of renewable energy resources
A. Raw renewable potential analysis (wind and solar), using best available data layers (including LiDAR as appropriate).	■ Yes	□ No	Page: Maps 3, 6 and 8 on pages 78, 87 and 89 respectively identify solar and wind resources.
B. Known constraints (signals likely, though not absolute, unsuitability for development based on statewide or local regulations or designated critical resources) to include: • Vernal Pools (confirmed and unconfirmed layers) • DEC River Corridors • FEMA Floodways • State-significant Natural Communities and Rare, Threatened, and Endangered Species • National Wilderness Areas • Class 1 and Class 2 Wetlands (VSWI and advisory layers) • Regionally or Locally Identified Critical Resources *If areas are constrained for the development of renewable energy due to the desire to protect a locally designated critical resource (whether a natural resource or a community-identified resource), then the land use policies applicable to other forms of development in this area must be similarly restrictive; for this category, policies must prohibit all permanent development (and should be listed in the Notes column).* *These areas should be subtracted from raw renewable energy resource potential maps to form Secondary Resource Maps*	■ Yes	□ No	Page: Table 15 on page 83 outlines the known constraints
C. Possible constraints (signals conditions that would likely require mitigation, and which may prove a site unsuitable after site-specific study, based on statewide or regional/local policies that are currently adopted or in effect), including but not limited to: • Agricultural Soils	■ Yes	□ No	Page: Table 16 on gage 85 outlines the possible constraints.

• FEMA Special Flood Hazard Areas • Protected Lands (State fee lands and private conservation lands) • Act 250 Agricultural Soil Mitigation areas • Deer Wintering Areas • ANR's Vermont Conservation Design Highest Priority Forest Blocks (or Habitat Blocks 9 & 10, for plans that will be submitted for adoption at the regional level by March 1, 2017) • Hydric Soils • Regionally or Locally Identified Resources *If locations are constrained for the development of renewable energy due to the desire to protect a locally designated resource (whether a natural resource or community-identified resource, like a view), then the land use policies applicable to other forms of development must be similarly restrictive (and should be listed in the Notes column). These areas should be subtracted from Secondary Resource Maps to form Prime Resource Maps.*			
D. Transmission and distribution resources and constraints, as well as transportation infrastructure. *(Including three-phase distribution lines, known constraints from resources such as Green Mountain Power's solar map, known areas of high electric load, etc.)*	■ Yes	□ No	Page: Map 1 on page 51 depicts the current capacity of transmission infrastructure in the Region. Paragraphs on pages 50 and 52 discuss the constraints the map depicts and makes policy recommendations.
E. Preferred locations (specific areas or parcels) for siting a generator or a specific size or type of generator, accompanied by any specific siting criteria for these locations *Narrative descriptions of the types of preferred areas in accompanying plan text are acceptable, though mapping of areas and especially specific parcels (to the extent they are known) is highly encouraged, to signal preferences to developers, particularly for locally preferred areas and specific parcels that do not qualify as a statewide preferred location under i. below.* *The locations identified as preferred must not be impractical for developing a technology with regard to the presence of the renewable resource and access to transmission/distribution infrastructure.*	■ Yes	□ No □ N/A	Pages 93 and 95 describing "good sites" include statewide "preferred sites". Additionally, the text on page 98 specifically acknowledges statewide "preferred sites" and harmonizes them with ACPRC's Plan. ACRPC did not map regionally preferred areas. However, ACRPC is working with its municipalities to identify and map preferred areas in their plans.

i.	Statewide preferred locations such as rooftops (and other structures), parking lots, previously developed sites, brownfields, gravel pits, quarries, and Superfund sites	■ Yes	□ No □ N/A	See E above.
ii.	Other potential locally preferred locations	■ Yes	□ No □ N/A	Page: The siting standards on pages 93-99 identify "good sites" ACRPC encourages its municipalities to identify and map additional local preferred areas.

For example, customer on- or near-site generation, economic development areas, unranked and not currently farmed agricultural soils, unused land near already developed infrastructure, locations suitable for large-scale biomass district heat or thermal-led cogeneration, potential locations for biogas heating and digesters, etc. *These are particularly important to map if possible (with the input of municipalities), as "a specific location in a duly adopted municipal plan" is one way for a net metering project to qualify as being on a preferred site.*			
12. **Does the plan identify areas that are unsuitable for siting renewable energy resources or particular categories or sizes of those resources**? *Either Yes or No ("No" if the plan chooses not to designate any areas as unsuitable) is an acceptable answer here. "Resources" is synonymous with "generators."*	□ Yes ("Yes" for A and B must also be selected below)	■ No	Page: This plan does not specifically identify unsuitable areas. Pages 93-99 create siting policies that identify poor siting areas for renewable energy generation for solar and wind facilities. Those policies also state that if municipal plans have certain restrictions due to the category or size of those resources, and deem sites unsuitable, the Region will support the municipal plan.
A. Are areas identified as unsuitable for particular categories or sizes of generators consistent with resource availability and/or land use policies in the regional or municipal plan applicable to other types of land development (answer only required if "Yes" selected above, indicating unsuitable areas have been identified)? *If areas are considered unsuitable for energy generation, then the land use policies applicable to other forms of development in this area should similarly prohibit other types of development. Please note these policies in the Notes column.*	□ Yes	□ No N/A (if no unsuitable areas are identified)	Page: ACRPC's plan does not identify unsuitable areas for specific types of generators. However, ACRPC acknowledges that it municipalities may identify those areas and specifically incorporates and supports its municipalities decisions

			by incorporating them into the Plan by reference.
B. Does the plan ensure that any regional or local constraints (regionally or locally designated resources or critical resources, from 11B-11C above) identified are supported through data or studies, are consistent with the remainder of the plan, and do not include an arbitrary prohibition or interference with the intended function of any particular renewable resource size or type? *Please explain in the Notes column.*	■ Yes	□ No	Page: The siting criteria the Region applies demands that locally identified constraints be supported by studies or data and consistent with their treatment of similar scale development.

13. Does the plan allow for the siting in the region of all types of renewable generation technologies?	■ Yes	□ No	Page: Yes, the Regional Renewable Energy Generation section, pages 72-81 identifies and supports current renewable generation technologies. The goals, actions and policies on page 100. state that the region will support responsible siting of emerging renewable technology.
14. Has your region provided (or do you have a plan to provide) a breakout of the map product(s) above to your municipalities? *Please explain your timeline for completing this task in the Notes column.*	■ Yes	□ No	Page: Both the energy element and maps are available to our towns on our website (www.acrpc.org). And have been provided to them on a municipal basis. The Regional Plan and maps have also been distributed to our member municipalities and are available on our website.