



New Community Project

February 7, 2020

Representative Tim Briglin
Chair, House Committee on Natural Resources and Energy
Montpelier, VT

Re: Comments on the proposed Greenhouse Gas Inventory for the GWSA

Dear Representative Briglin.

My name is Pete Antos-Ketcham. I serve as a regional representative of the New Community Project (NCP) in Vermont coordinating NCP's New England Sustainable Living Center in Starksboro. I write today to provide comments for your consideration regarding the **Greenhouse Gas Inventory (GHGI) of the proposed Global Warming Solutions Act (GWSA)**.

NCP is nonprofit organization committed to the creation of sustainable systems that care for the earth, empower people most marginalized and impoverished, educate and inspire, and build the foundation for a nonviolent lifestyle. We work to create transformation at both the personal level and community level in three key areas that have the highest impact: food, transportation, and built environment. You can learn more about our organization and our work in Vermont at our [website](#).

NCP Vermont is primarily focused on addressing social justice and ecological issues where they intersect at the community level. Our main projects here are operating a Food Pantry and Emergency Heating Assistance program for the rural poor in the greater Starksboro area. While these programs are aimed at providing immediate relief to those on the margins of our local area, we also look at the bigger picture of issues impacting our region and our world. Our organization is partnered with groups around the world in eleven different countries and one of our primary issues is **to help educate people here about climate change about how our lifestyle impacts some of the world's most marginalized peoples**.

Regionally, NCP Vermont is working with Indigenous Communities in Quebec and the Maritime provinces who are resisting the expansion of large scale hydroelectric facilities (Megadams). These Megadams destroy vast areas of their traditional hunting grounds while also polluting their local food supply with Methyl Mercury. To these groups, large-scale hydroelectric projects which are being built to supply more electricity to the Northeast United States are a form of cultural genocide.

Additionally, hydroelectric facilities, especially large scale facilities, have a range of GHG impacts that must be considered in any inventory and plan to address climate change. First, the construction of Megadams requires significant GHG emissions as a result of a significant amount of materials required to build dams of this size. These materials are some of the most carbon-intensive materials out there, and these should be "counted." Second, flooding the ecosystem creates a large release of methane into the atmosphere; again, this too should be "counted" because it is far from inconsequential. Third, the removal of the forest ecosystem to create a reservoir – a carbon sink – has now been lost. Again, this too should be "counted." Furthermore, the projects of this scale, with the permanent (and very non-renewable) ecosystem damage they entail, would never receive a permit here in Vermont. And yet Vermont seems to celebrate that this is so-

called “clean energy,” forgetting the people and ecosystems hurt by their construction and neglecting to consider the life-cycle impact of GHG created by these Megadams.

In Vermont, our GHG inventory process should account for the entire life-cycle impact of power that comes from Megadams. By not addressing these emissions, the current GHGI grants special preference to this energy source, while ignoring the impact on Indigenous communities completely. If we are truly going to reach net-zero as a state with integrity, it’s critical that the full-cycle GHG impacts of Megadams are fully evaluated and counted—and we also acknowledge the negative impact on our Indigenous neighbors in Canada.

The GWSA will be an essential component of an overall strategy for Vermont to address this crisis and help slow global warming and we thank the Legislature for taking on this important project. While Vermont cannot solve this problem alone, this crisis will only be averted if people everywhere step up and do their part. For out-of-state energy sources where we have limited opportunity for verification, a conservative default value should be applied.

Thank you for providing this opportunity comment on the Greenhouse Gas Inventory. NCP looks forward to providing additional comments on the GWSA in the coming weeks and would welcome the opportunity to speak with you and other members of the committee.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Pete S. Antos-Ketcham". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Pete Antos-Ketcham
NCP New England Sustainable Living Center

CC: VT House Committee on Energy and Technology, NCP Advisory Board, and Staff