

Date	Pathway/ Strategy	Comment:	Response to Comment:
		ADAPTATION AND RESILIENCE	
		<i>Pathway B</i>	
11/9/21	Path B Strat 5	Suggest we add language about making NRCS Ecosystem Restoration Program more efficacious and accessible for Vermont in wake of disasters	<p>Thank you for the suggestion. NRCS is federal, outside the scope of state level actions. Coordination with NRCS is mentioned in Path C, Strat 2 so I have added it there. Note the below.</p> <p>The USDA Farm Service Agency (FSA) administers the Emergency Conservation Program (ECP) to support farmers to: “repair damage to farmlands caused by natural disasters and to help put in place methods for water conservation during severe drought. The ECP does this by giving ranchers and farmers funding and assistance to repair the damaged farmland or to install methods for water conservation.”</p> <p>Where ECP is a federally administered program, the State of Vermont coordinates with USDA in providing information and coordination to implement the program successfully. The State of Vermont does not have direct administrative oversight of the FSA ECP program.</p>
11/9/21	Path B Strat 5	<p>Statewide land use plan and planning office are well worth considering but the entire state planning rubric needs to be revisited to objectively assess how state policy can be effectively implemented and administered in a timely manner.</p> <p>Vermont's diffuse planning structure can result in municipalities adopting and implementing state policy at their option, and they may not have the capacity (political or operational) to administer plan policy;</p> <p>Federal legislation, policy and programs will likely need to be changed to effectively implement strategies and actions ranging from Extension to NRCS programs to farm/forest conservation programs.</p>	Thank you for the input. This action was revised significantly based on robust debate within the subcommittee
JM	Path B Strat 6	These feel narrow... what about things like the wetland restoration initiative being led by FWD, river corridor	I believe we call out river corridor and floodplain easement expansion in another strategy/section. We have added them

		easements, forest land conservation thru programs like Forest Legacy, etc.	here, as well. I think forest legacy references are made within the sequestration/storage section of the CAP.
11/9/21	??	“Jurisdictional RAP farms are eligible to apply for VAAFMM programs.” – Many people likely don’t know what RAP means. Greater explanation about what this program is, how an eligibility to apply enhances equity would be very helpful.	RAPs are the Required Agricultural Practices, which the agricultural community is all familiar with. We can include the long form for other readers but have had trouble locating this reference. We’ll review our Pathway A for this reference.
	Path B Strat 3	What does “de-risk capital investment in and support for NBS and TEK projects” mean?	Private financing can be very helpful as capital investment, especially when we are asking landowners to implement practices that have significant up-front costs that will not yield a return until perhaps, they are repaid by a conservation program or a carbon market. De-risking, for example, carbon markets for forest owners and buyers could use mechanisms such as the following: *Credit enhancement (or guarantee) for qualified bonds— bonds, with a government guarantee to de-risk the investment, can be issued to bring private capital to cover upfront costs, paid back when carbon is sold. (This could be done under existing authority such as the WISPr program.) *Loan guarantees for qualified entities – a loan, with a government guarantee, could be used to provide upfront capital for implementing practices, with the loan paid back when carbon is sold. Loans would have to be VERY low interest to make this model work effectively.
		<i>Compact Settlement</i>	
11/9/21	Path F Strat 1	Pathway F should be moved to the Compact Settlement section.	Noted and all policies specific to Compact Settlement have been moved to Cross Cutting Section
11/9-10	Path F Strat 1	Overlapping and potentially conflicting strategies and actions with should be resolved - e.g. ban all development in river corridors v. allow flood safe infill in compact settlement areas needed to reduce transportation-related emissions.	Moved to cross-cutting land use section where this comment will need to be addressed.

		Re: river corridors – some confusion that there was a ban on development in RC – there is language about RC protection only.	
11/9/21	Path F Strat 1	Under Pathway F-1-C: support redevelopment of already developed areas to make more efficient use of land and to transform areas of sprawl into compact settlements; Suggest designations listed under F-1-D be revisited to ensure sufficiency to achieve this objective. Many "centers" are too small to accommodate growth - Neighborhood Development Areas might cover but need to game out different scenarios to see if CAP goals are supported.	Moved to cross-cutting land use section where this comment will need to be addressed.
11/10/21	Path F Strat 1	Some concerns that village centers and downtowns are very small areas -not able to accommodate growth. Need to look at redevelopment of other impact areas and intensification of already impacted areas. Billy suggested that there are some opportunities in designated downtowns to increase density but these areas are probably not enough - subcomm needs to discuss wording and possible expansion of language. Another councilor was concerned about linking dense settlement to areas with existing infrastructure - has the potential to be a barrier to investment and revitalization in many rural villages without community-scale water and wastewater - may further narrow prior flags	Moved to cross-cutting land use section where this comment will need to be addressed.
		<i>Renewable energy siting issues</i>	
11/9/21	Path F Strat 5	Requiring or incentivizing RE on buildings or already-existing developed lots/parking lots are phrased in a way that would raise concerns about potential increased costs on electricity customers, including the equity issues that can result from that, unless rephrased to include incentives/supports from sources other than electric customers. Would like to understand better how this considers equity and cost-effectiveness, considering that often projects on the built environment (e.g., landfills, brownfields, large rooftops) can cost significantly more money.	Language was added to clarify the intent of these incentives to in part promote storage, sequestration, and co-benefits. The SC's proposal to incentivize certain renewable activities is in keeping with any number of incentive-based energy efficiency and renewables' initiatives the state has supported throughout the years. Ratepayer impacts and equity concerns should be addressed for low- and moderate-income ratepayers but the fairness of our particular recommendation must be considered in conjunction with, not separate from, multiple incentive programs. Moreover, the "costs" of these incentives need to be considered in light of the overall cost-benefit of driving

		It seems important to define these terms (e.g., what is the definition of "natural lands"). Based on that, it may raise other comments/potential concerns.	development to the built environment to ensure protection of working and natural lands for the many sequestration, storage, and ecosystem services they provide for all Vermonters. For instance, the 'costs' of solar currently do not consider the impacts and degradation to land/biodiversity/etc. or loss of carbon. Thus, all Vermonters are currently paying for the loss of numerous ecosystem services, including food provision, carbon sequestration and storage, and others, when solar is sited on natural or working lands.
11/10	Path F Strat 5	Councilors suggested looking at regional energy plans for statutory siting rules; Act 74 – concern that subcomm had not yet considered Act 74 language. Check language of “require” and “consider” – some cases seem to conflict	The intent of the recommendation is to review Act 74 and determine if it is meeting its goals. The recommendation does not suggest that there can be no impacts to working and natural land, but rather careful consideration should be made in energy siting to consider trade-offs between renewable energy as mitigation <u>and</u> land and forest value for storage and sequestration of carbon as well as many other co-benefits.
JM	Path F Strat 5b	Any mandate is potentially problematic and should be carefully considered.	Language was adjusted to provide, encourage, and support. The word “require” was stricken.
		<i>Pathway E</i>	
11/10	Path E	How do these food system recommendations relate to climate?	Food system chains are highly dependent on GHG and an infrastructure that supports that, so it is brittle. In face of a changing climate, the first thing that falls is the food system and food security is gone. It may seem like a stretch, but when one looks at the Midwest and Pacific Northwest with crop damage, what farmers are dealing with nationally, it could be one of our biggest issues in the future.
JM	Path E	Unclear how this relates to “local food markets” in the heading. Appreciating the very real human concerns about food insecurity, unclear to me how this is a climate change strategy	Developing local food markets within Vermont and regionally within the Northeast can ensure a more resilient food supply in the face of climate disruptions elsewhere in the nation or the world.