

DRAFT

Preliminary, Draft Rubric Assessment

This is a preliminary, draft rubric assessment of the Biomass Task Group’s recommendations. This preliminary, draft assessment is meant to help start the rubric review processes and discussion, which should be informed by impacted community members, the Just Transitions Subcommittee, the Biomass Task Group, and other members of the public. This draft, preliminary rubric assessment is only the beginning of what should be a longer and broader conversation.

RUBRIC DIRECTIONS

The Rubric is intended to accompany a narrative response for each of the Assessment Questions in Section V. In reviewing the proposal, please consider the Rubric’s prompts and their resonance to the goals and vision of this project. An area is provided for comments. The Rubric allows a score of 1 (low) to 3 (high) for each criterion.

1 (low): The proposal meets the criteria to some degree but provides limited explanation or there are significant opportunities to enhance these criteria in the proposal.

2 (moderate): The proposal meets the criteria. There are additional opportunities to enhance these criteria to better meet the goals of the Guiding Principles.

3 (high): The proposal excels in meeting the criteria.

If a recommendation does not yet address the criteria at all, additional work is required.

DRAFT PRELIMINARY RUBRIC ASSESSMENT

Policy/Proposal Title: Biomass Task Group Draft Recommendations

Policy/Proposal Summary: Assessing wood biomass electricity generation in the context of Vermont equitably meeting its greenhouse gas emission reduction requirements.

Frontline/Impacted Communities Score 1 – 3 on impression of meeting criteria	Please select 1 low to high 3		
	1	2	3
Frontline/Most Impacted Communities well defined in proposal			
Comments: The draft recommendations identify frontline communities in relation to the McNeil wood biomass electricity generation facility to include residents of Burlington’s Old North End, Winooski, and adjoining neighborhoods. The draft recommendations note that residents of those communities may experience disproportionate health burdens because of air pollution from McNeil. Those neighborhoods are racially and ethnically diverse and have historically been homes to historically-marginalized people. Although those impacted communities are understood in relation to McNeil, and are addressed in the draft recommendations, there has been minimal outreach to those communities and nearly no opportunity for them to influence the draft recommendations. Given the rural location of Ryegate, the human health impacts are less pronounced for that facility. Public comment has been received about the Ryegate facility’s potential health impacts on the fauna living near the facility but not as to impacted Vermonters.	1	2	3
The draft recommendations recognize that a future phase-down in wood biomass electricity generation could have economic impacts for Vermont foresters and landowners who sell wood to Vermont’s biomass electricity generation facilities. The draft biomass recommendations suggest that steps should be taken to facilitate a just	1	2	3

transition for such landowners and foresters by identifying alternative markets and revenue streams.			
Proposal reflects understanding of existing inequities around the issue for frontline/most impacted communities	1	2	3
Comments: The draft recommendations reference potential health impacts on frontline communities living near McNeil and identify potential air quality and human health assessments that could be done to mitigate such harms. The draft recommendations also identify the need for additional outreach to, and input from, those impacted communities. The draft recommendations seek an evidence-based study overseen by the Climate Action Office that would account for topics addressed in the comments immediately above. The draft recommendations are not, however, informed by impacted community members and thus likely have blind spots that should be addressed. Nor are the draft recommendations informed by a historical perspective of inequities experienced by many residents of the Old North End and Winooski.			
Total			
Analyzing Burdens and Benefits			
Score 1 – 3 on impression of meeting criteria		Please select 1 low to high 3	
Proposal clearly identifies how benefits are shared for frontline/most impacted communities	1	2	3
Comments: The draft recommendations do not identify benefits for impacted community members in the Old North End or Winooski.	1	2	3
The draft recommendations seek alternative revenue streams and markets for impacted foresters and landowners.	1	2	3
Proposal clearly identifies who/what carries the burdens from the recommendation, if any	1	2	3
Comments: The draft recommendations identify that people living near the McNeil facility may bear disproportionate health burdens. The draft recommendations are not informed by input from impacted community members and may thus have blind spots as to additional burdens. The draft recommendations call for a study that would include additional analysis as to the benefits and burdens that may be borne by different people.	1	2	3
The draft recommendations note that Vermont landowners and foresters may experience economic burdens if new revenue streams and markets are not identified.	1	2	3
Proposal includes solutions to shield frontline/most impacted communities from experiencing burdens from the recommendation, if applicable	1	2	3
Comments: The draft recommendations seek a study about a potential phase-down of wood biomass electricity generation. The draft recommendations imply that if such a phase-down were to occur, health burdens in adjacent communities may result. However, the draft recommendations do not include specific or concrete solutions that would shield people who live adjacent to the McNeil facility from health burdens.	1	2	3
As noted, the draft recommendations suggest that new revenue streams and markets should be identified for Vermont farmers and foresters. More specific solutions for landowners and foresters are to be considered in an evidence-based study overseen by the Climate Action Office.	1	2	3

Proposal outlines the long-term/intergenerational impacts (positive or negative) of recommendations on impacted communities	1	2	3
Comments: The draft recommendations do not themselves achieve this target. The draft recommendations call for an evidence-based study overseen by the Climate Action Office. That study could potentially include such an analysis.			
Proposal outlines how it will create a future that is more equitable than the unjust status quo	1	2	3
Comments: The draft recommendations seek a study into a potential phase-down of existing wood biomass electricity generation. The recommendations do not provide concrete proposals for a more equitable future for those people who currently bear the burdens of the McNeil facility. However, the draft recommendations do address a just transition for impacted foresters and landowners in the event a wood biomass electricity generation phases-down occurs in the future. The draft recommendations identify that a thermal-only facility in the current McNeil footprint would need to be investigated from an equity perspective before proceeding. And the draft recommendations request that no new “electric-led” biomass facilities occur in Vermont, avoiding potential air pollution.			
Total			
Ensuring Equitable & Just Engagement			
Score 1 – 3 on impression of meeting criteria		Please select 1 low to high 3	
Proposal reflects inclusion of frontline/impacted communities in design and implementation of recommendation	1	2	3
Comments: As to those who bear the health impacts of wood biomass electricity generation, no. As to those who would experience economic transitions if existing wood biomass facilities were to phase-down, yes.	1.5		
Vermonters can hear their voices in the recommendation	1	2	3
Comments: As to those who bear the health impacts of wood biomass electricity generation, no. As to those who would experience economic transitions if existing wood biomass facilities were to phase-down, yes.	1.5		
Recommendation written in plain language and easy to understand	1	2	3
Comments: There are some jargony terms relevant to wood biomass electricity and heat generation, and as to health study development. Overall, however, the language is relatively accessible.			
Total			
Funding & Data			
Score 1 – 3 on impression of meeting criteria		Please select 1 low to high 3	
Funding mechanism for recommendation is clearly defined	1	2	3
Comments: It is unclear whether funding is currently available for the evidence-based study contemplated in the recommendations.			
Funding mechanism makes recommendation affordable and accessible to frontline/most impacted communities, if applicable	1	2	3
Comments: n/a			
Proposal identifies data and indicators to determine success	1	2	3
Comments: The draft recommendations identify the need for an evidence-based study and additional health investigations. The draft recommendations do not otherwise establish data or indicators to determine success.	1.5		
Proposal includes process for consultation with frontline/most impacted communities in assessment activities	1	2	3

<p>Comments: The draft recommendations note the need and desire for future consultation with frontline community members. The draft recommendations note that that process should include residents from the Old north End, Winooski, and other impacted neighborhoods; the Just Transitions Subcommittee and other relevant Climate Council subcommittees and task groups; and relevant agencies, such as the Department of Health and the State Historic Preservation Office. The draft recommendations do not, however, create an actionable plan to engage in that process, which is especially needed to effectively work with residents of impacted neighborhoods.</p>	1.5
<p>Proposal includes plan for collection and review of data with frontline/most impacted communities</p>	1 2 3
<p>Comments: The draft recommendations do not currently include such a plan.</p>	
<p>Total</p>	

Implementation & Outcomes Score 1 – 3 on impression of meeting criteria	Please select 1 low to high 3		
Proposal identifies new jobs/business/employment opportunities for the recommendation	1	2	3
Comments: The draft recommendations currently identify the need for new revenue streams and markets for private landowners and foresters who currently sell wood to Vermont's wood biomass electricity generation facilities, especially if wood biomass electricity generation phases-down in the future. That type of investigation could potentially identify ways that existing wood biomass electricity generation facilities could be retrofitted to become places in which such alternative markets could be based – e.g., particle board or wood-fiber insulation facilities – which could provide additional jobs, especially for people currently employed in such facilities. However, the draft recommendations call for a study of such things, and do not specifically address them. Any such recommendations should take into account impacts on adjacent communities.	1.5		
Jobs created by recommendation offer fair, high paying positions with good benefits	1	2	3
Comments: See response immediately above.			
A wide range of traditionally underserved Vermonters and unions are prioritized in the jobs created by the recommendation	1	2	3
Comments: Same as above.			
Communities, local/regional governments, organizations and families have the capacity to implement the recommendation.	1	2	3
Comments: n/a			
The recommendation provides a specific, quantifiable commitment to a just transition	1	2	3
Comments: The draft recommendations call for no new electricity-led wood biomass facilities in Vermont, which could help to avoid additional air pollution. The draft recommendations do not specifically call for a phase-down of existing wood biomass electricity generation adjacent to residential communities, instead calling for an investigation of a potential phase-down. The draft recommendations call for an investigation of new revenue streams and markets for landowners and foresters, but does not identify specific such revenue streams or markets.	1.5		
The recommendation supports the natural environment and promotes fairness to all living things	1	2	3
Comments: Flagging for further discussion			
Total			

Total scoring (21 low to 63 high):

Direct Benefits to Underrepresented/Most Impacted Communities (use blank spaces as needed to add)

The recommendation provides direct benefits for the following groups:	
Agricultural Sector	Yes <input checked="" type="checkbox"/> No
Black/African-American, Brown, Latinx, Asian, Pacific Islander, and Indigenous communities and Native nations	Yes <input checked="" type="checkbox"/> No
Disabled and chronically ill people	Yes <input checked="" type="checkbox"/> No
Displaced due to severe weather	Yes <input checked="" type="checkbox"/> No
Older Vermonters	Yes <input checked="" type="checkbox"/> No
Formerly incarcerated individuals	Yes <input checked="" type="checkbox"/> No
Immigrants, regardless of immigration status	Yes <input checked="" type="checkbox"/> No
LGBTQIA+ individuals	Yes <input checked="" type="checkbox"/> No
People living with low or very low incomes	Yes <input checked="" type="checkbox"/> No
Outdoor laborers	<input checked="" type="checkbox"/> Yes No
Recent graduates of the foster care system	Yes <input checked="" type="checkbox"/> No
Unions/Organized Labor	Yes <input checked="" type="checkbox"/> No
Women	Yes <input checked="" type="checkbox"/> No
Young People	Yes <input checked="" type="checkbox"/> No
	Yes No
	Yes No
	Yes No
	Yes No
	Yes No
	Yes No
	Yes No
	Yes No

Narrative on Impacted Communities: The draft recommendations identify people who live in the Old North End, Winooski, and adjacent neighborhoods as likely to bear health burdens from the McNeil facility. Residents from those communities have not, until now, meaningfully participated in the creation or revision of the draft recommendations. The draft recommendations seek an evidence-based study that would investigate, among other things, impacts felt by residents of those neighborhoods. The draft recommendations also call for the need for, and seek to establish a process for, collaboration with impacted community members. No such action has yet occurred. The draft recommendations note that if a wood biomass electricity generation phases-down occurs in the future, Vermont landowners and foresters who sell wood to McNeil and Ryegate may see a decline in markets for their wood products. The draft recommendations thus call for a just transition for landowners and

foresters by commissioning an evidence-based study that would, among other things, identify alternative revenue streams and markets for such landowners' and foresters' products.

Recommend: **Yes** **Yes with Changes** **No**

Explanation: