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| **Comment**  **Number:** | **Date Received:** | **Comment:** | **Response to Comment:** |
| 1 | 11/7 | There was never time or opportunity to coordinate strategies and actions across the pathways/working groups. Consequently there are similar overlapping actions re: vulnerability assessments, planning and creating capacity to help communities adapt to climate change, funding implementation -- buyouts or upgrades to ensure buildings, infrastructure, people, businesses, and communities/regions take steps to become more resilient to climate change. This repetition may be okay, but not if the goal is to develop a plan that is concise.  If the goal is to create a final plan that is clear and concise, the overlap and duplication should be addressed. There is insufficient time to make these changes now. Suggest they be made after gathering additional stakeholder input. |  |
| 2 | 11/7 | The "evaluate and eliminate statutory barriers to school and municipal solar participation" recommendation does not account for customer cost-shift that occurs through net metering; rather than eliminating the net metering size/amount limits as has been proposed in the past, the SOV should develop (or individual utilities could do so on their own) a solar program for schools and municipal buildings that provides shared value for the generation and greater onsite resiliency (paired storage where appropriate) at a lower or no cost shift to other customers and taxpayers - this would be consistent with an earlier recommendation that recognized the importance of considering costs to utility customers (rate payers) for improvements. **I would stand behind a rewording of this recommendation that either struck "eliminate statutory barriers" or replaced that phrase with "develop cost-effective program to support..." school and muni solar.** | Intent of action around statutory funding decision making requirements for spending money and leasing property – not about net metering.  Rewording would be in addition to the stated intent of the action.  **From Council meeting:** The sub-committee clarified that the focus of the recommendation was on financing and they did not discuss net-metering. The sub-committee will take up the suggestion of referring to cost-effective programs. |
| 3 | 11/7 | 1. In P1, S1, the climate impacts for which the toolkit should help towns in planning should include high winds and heavy rain/hail/sleet.  2. P1, S3 aims to "advance equitable resilience", but neither of the actions addresses that.  3. P4, S1: should we add as an action relocating wastewater treatment facilities away from rivers/lakes, both to reduce the chance the facility will be damaged in flooding and to improve water quality?  The only thing I'd add to the above is whether we should be thinking about the fact that a lot of historic villages are on rivers and in floodplains. How do we grapple with the notion that it may make the most sense to relocate some villages in their entirety? | 1. P1, S1, has broader language, action has specific hazard language. Action in capacity building references identifying additional hazards, risks, and vulnerabilities. 2. Could address in the strategy table in the equity field. Toolkit action references the vulnerability index which is in another pathway. 3. By nature of the facilities, they are at risk, can be hardened but not moved? Include in evaluation question under action in Pathway 2. Pathway 4 references new development, siting of new infrastructure. Making new infrastructure resilient is covered under P2.   Relocation of entire villages may need to be reflected in additional data and research, what are the vulnerabilities and tipping points?  From Council meeting: The subcommittee said there is a not a one size fits all solution for these communities. The idea is to have tools that are accessible for these communities based on a vulnerability assessment of the risks to their villages. It may lead to relocation of structures. It could look at other solutions.  Include high winds/heavy rain in toolkit: The subcommittee said this was the intent, but they will make it more specific.  On **advance equitable resilience**, there was an ask to clarify was this section means as neither of the actions address that: The subcommittee clarified that it relates to the statutory charge and it was more about the assessment piece. There will be tables that address equitable program design. The subcommittee will also broaden P2 beyond ski and sugaring.  On **relocating wastewater treatment facilities**: The subcommittee said that there is not a one size fits all solution to that issue, but it is a part of the toolkit and assessment. There was no specific suggestion, but language will be strengthened after the meeting. |
| 4 | 11/7 | Increase efforts and funding towards pollution prevention programs at wastewater facilities - unclear what the link is to resilience or climate change?  Water infrastructure description in Pathway #2 does not match well with how we talk about water infrastructure in Vermont.  Unclear how "b. Implement the recommendations from an AOT study evaluating road usage charges such as a flat fee, mileage-based fee and per kilowatt hour fee to replace the decline in state motor fuel taxes resulting from vehicle electrification." is a resilience/adaptation strategy  Pathway 4, Strategy 1 talks about pre-empting sprawl, but the actions don't seem well-matched to this pathway/strategy. | 1. Water/wastewater actions came directly from DEC. 2. This action is about making the transportation fund more resilient to the changes needed to address climate change. Making the funding source more resilient. 3. Compact settlement/sprawl has moved to section 15 – cross-cutting pathways. Tighten up paragraph to talk about infrastructure investment.   From Council meeting: On **water infrastructure language not aligned with typical approach,** the council was concerned about the water infrastructure text not being matched with ANR terminology. However, this alignment is now happening.  On **road funding recommendation**, the Council asked for clarity on these funding recommendations for roads: The subcommittee clarified that they were trying to find how to make up money for the costs of these plans. The council and subcommittee felt it was too early to put these recommendations in here as it needs to be given to the legislature for discussion. It will be noted in the document that this is an issue to be addressed and find resolution for.  **On the link between pollution prevention programs and wastewater facilities:** The subcommittee stated that there is a sentiment that pollution in waterways means that a community needs help and there is a lot of intrusion in water treatment facilities. One council member felt that this could be stretch for climate action. Others felt that this is tapped into climate infrastructure. |
| 5 | 11/7 | Felt like drought impacts on drinking water systems was absent from draft.  Actions under Strategy #3 (Expand cross-sector collaboration to align efforts, share best practices, and leverage resources to advance equitable resilience and preparedness efforts statewide.) do not seem well-aligned with the strategy.  General concern that the water infrastructure pieces are not well-matched with ANR priorities around water infrastructure resilience. | 1. P2, S1 references understanding source water vulnerabilities, add “to drought”. Potentially add threats to framing of the pathway. Pathway 4 has a specific action related to water systems and drought. 2. Strategy speaking to specific requirements called out in the GWSA. Could add stronger actions under this strategy that reference building cross-sector collaboration. Some actions pulled out for cross-cutting section.   From Council meeting: Drought impacts on water: The subcommittee mentioned that impacts were not called out hazard by hazard. All aspects of hydrology will be up front in the section as it is not just about the drought impacts on drinking water; it’s about drought as a whole. There were not any specific recommendations given, but people could send recommendations to the subcommittee to review. |
| 6 | 11/8 | No issues that rise to the level of significant concern. However, I do have a couple of questions:  Under Pathway 3, Strategy 2, 2nd to last bullet point ("Develop a program to establish Weatherization Navigators at each Regional Planning Commission (RPC) to help individuals, municipalities, and businesses through the process of weatherization and energy efficiency upgrades."): Why are RPCs the appropriate place for such staff? Why wouldn't Efficiency Vermont and/or the Community Action Agencies be more appropriate, given their experience in delivering these programs around VT?  Pathway 3, Strategy 2, 2nd bullet point: I thought the PACE program had ended, for lack of uptake (I could be wrong). Does it still exist? | 1. Including position at RPCs would be for it to be someone in the community; could help a broader swath of people than CAP agencies typically serve. Could change to be more general, ensure it is a community member that understands and is trusted in the community. Could amend to state “RPC or other community entity to serve individuals and municipalities”. Volume of weatherization is large, could amend action to have position at every community organization. 2. Follow up with Ann, Chad, Dave re: PACE program.   From Council meeting: Weatherization Navigators: This could be amended so that they are in multiple places. The idea would be to have increased capacity and “doors” to open to find that capacity. The language will also include the importance of coordination among navigators and how this is a whole system approach beyond weatherization. |
| 7 | 11/8 | This is clearly a very comprehensive, well considered significant bucket of strategies to pursue. Most of any "concerns" I would have would be related to how to measure, prioritize and ultimately begin to advance these strategies, as there are many of them and how they move actually forward through rule-making, the legislative process etc. will be critical. As well, refining with a level of detail that, as is true with other subcommittees, is needed. That said, there are also a few instances where there is a level of detail, where more flexibility or another approach may be helpful to consider. | 1. Most recommendations have to do with capacity (people) to establish metrics; need vulnerability assessments first before those metrics can be established. 2. Measuring and assessing progress section of the CAP will discuss further work needed in this area. |
| 8 | 11/8 | Just one example of a level of specificity that may be helpful to keep more flexible includes: "Develop a program to establish Weatherization Navigators at each Regional Planning Commission (RPC) to help individuals, municipalities, and businesses through the process of weatherization and energy efficiency upgrades." This is an important recommendation; I wonder though if it can be expanded. This kind of service might also be housed at the Community Action Agencies, Efficiency VT or elsewhere. | See above response to comment #6. |
| 9 | 11/4 | I would like to recommend that the Community Action Agencies be identified as entities that the state can quickly seek to resource to address the most “frontline” and marginalized communities/residents with services. | From Council meeting:  On **communication action agencies**, council members recommended that the Community Action Agencies be identified as entities that the state can seek to resource and to address frontline issues.  The subcommittee could change the name to Community Action Networks to expand the concept. There will be more discussion outside of the meeting to discuss individual assistance post-disaster for marginalized communities. |
|  |  | L.A.  When you say 'toolkit' is it the Climate Resilience Toolkit that already exists OR a new one to be developed?  C. Dimitruk  It is a statutory requirement, we plan to rely in large part on pre-existing toolkits. So I think the answer is yes!  L.A.  Good. A lot of other Climate Action Plans (Hawaii, Rhode Island, Delaware, Chicago) were built on the NOAA Climate Resilience Toolkit. I had tried to get this introduced back in August when the Toolkit personnel were willing to come and chat with the Council, but it did not get any traction.    If you would like to write it into your section, I'll do the same in the front opening as well. |  |
|  |  | Include logging industry in the discussion of further impact assessment for ski and sugaring industries. |  |
|  |  | For the (12) Pathways for Adaptation and Building Resilience in Communities and the Built Environment doc, I would like to offer the following resources for helping to round out the a) the framing of natural hazards covered in this document and b) the latest materials on Tropical Storm Irene, especially a National Weather ServiceStorymap that was created for the 10th anniversary <<https://storymaps.arcgis.com/stories/a596e2f186394d3d9c285e71e5e2f460>>. I have attached a paper of mine that I am using to frame the Introduction to the CAP and here is the link to the Northeast chapter of the Fourth National Climate Assessment. <https://nca2018.globalchange.gov/chapter/18/> |  |
|  |  | Line 35: “flooding poses” – clarify that this is fluvial erosion flooding, not (for the most part) inundation flooding. |  |
|  |  | Line 150 action D – what about assistance for drinking water systems that are imperiled by drought conditions? |  |
|  |  | Line 503 action A – fossil fuel collection for whose use/where is this reported? |  |
|  |  | Line 547 Action 1 - While these are all great ideas and possibilities – this is core infrastructure upgrades for Vermonters and given our housing stock and income levels, this should be considered strongly for direct infrastructure funding grants or financing – state or federal – rather than electric customer subsidy which just puts pressure on electric rates. I’d suggest adding “infrastructure grant support” or similar to the list explicitly – the word “grant” appears but the lead is payment by electric customers through utilities, which should probably be secondary if there is other support available that would not impact electric rate affordability. |  |
|  |  | *See comment #2*  *On* ***eliminate statutory barriers to school and municipal solar participation,*** *the Council had concerns on the recommendation not accounting for the electricity customer cost-shift that occurs through net-metering.* | *The sub-committee clarified that the focus of the recommendation was on financing and they did not discuss net-metering. The sub-committee will take up the suggestion of referring to cost-effective programs.* |
|  |  | *See comment #4*  *On* ***water infrastructure language not aligned with typical approach,*** *the council was concerned about the water infrastructure text not being matched with ANR terminology. However, this alignment is now happening.* |  |
|  |  | *See comment #3*  *On* ***the relocation of villages****, the council had concern about what this actually means for historic villages especially on rivers and in floodplains.* | *The subcommittee said there is a not a one size fits all solution for these communities. The idea is to have tools that are accessible for these communities based on a vulnerability assessment of the risks to their villages. It may lead to relocation of structures. It could look at other solutions.* |
|  |  | *See comment #4*  *On* ***road funding recommendation****, the Council asked for clarity on these funding recommendations for roads.* | *The subcommittee clarified that they were trying to find how to make up money for the costs of these plans. The council and subcommittee felt it was too early to put these recommendations in here as it needs to be given to the legislature for discussion. It will be noted in the document that this is an issue to be addressed and find resolution for.* |
|  |  | *See comment #5*  *On* ***drought impacts of drinking water,*** *Council members had concern that this was an issue that was absent from the draft* | *The subcommittee mentioned that impacts were not called out hazard by hazard. All aspects of hydrology will be up front in the section as it is not just about the drought impacts on drinking water; it’s about drought as a whole. There were not any specific recommendations given, but people could send recommendations to the subcommittee to review.* |
|  |  | *See comment #3*  *On* ***including high winds and heavy rain****, the Council asked for the toolkit to include how to plan for high winds and heavy rain.* | *The subcommittee said this was the intent, but they will make it more specific.* |
|  |  | *See comment #3*  *On* ***advance equitable resilience****, there was an ask to clarify was this section means as neither of the actions address that.* | *The subcommittee clarified that it relates to the statutory charge and it was more about the assessment piece. There will be tables that address equitable program design. The subcommittee will also broaden P2 beyond ski and sugaring.* |
|  |  | *See comment #9*  *On* ***communication action agencies****, council members recommended that the Community Action Agencies be identified as entities that the state can seek to resource and to address frontline issues.* | *The subcommittee could change the name to Community Action Networks to expand the concept. There will be more discussion outside of the meeting to discuss individual assistance post-disaster for marginalized communities.* |
|  |  | *See comment #3*  *On* ***relocating wastewater treatment facilities,*** *a question was posed about relocating wastewater treatment facilities away from rivers and lakes to reduce facility damage and to improve water quality.* | *The subcommittee said that there is not a one size fits all solution to that issue, but it is a part of the toolkit and assessment. There was no specific suggestion, but language will be strengthened after the meeting.* |
|  |  | *See comment #4*  *On* ***the link between pollution prevention programs and wastewater facilities****, a Council member asked to clarify the link between these two entities.* | *The subcommittee stated that there is a sentiment that pollution in waterways means that a community needs help and there is a lot of intrusion in water treatment facilities. One council member felt that this could be stretch for climate action. Others felt that this is tapped into climate infrastructure.* |
|  |  | *See comment #6*  *On* ***weatherization navigators****, Council members had a question on where to house this type of staff.* | *This could be amended so that they are in multiple places. The idea would be to have increased capacity and “doors” to open to find that capacity. The language will also include the importance of coordination among navigators and how this is a whole system approach beyond weatherization.* |