

Comment Number:	Date Received:	Comment:	Response to Comment:
2	11/7	<p>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.</p>	<p>The focus of the recommendation was on financing, not on net-metering. The sub-committee will take up the suggestion of referring to cost-effective programs and change reference to removal of unnecessary statutory barriers related to capital financing and land purchase/lease.</p>
3	11/7	<p>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?</p>	<p>Many of the actions included in this section reference the need for tools and education for communities to assess and adapt to the hazards they face. There is no one size solution for communities located in floodplains, and the subcommittee's recommendation is to provide support and tools to communities to assess their hazards, and determine the best approach to meeting those hazards. Relocation of entire villages may need to be reflected in additional data and research; need to understand what the vulnerabilities and tipping points are.</p>
4	11/7	<p>In P1, S1, the climate impacts for which the toolkit should help towns in planning should include high winds and heavy rain/hail/sleet.</p>	<p>P1, S1, has broader language, while actions below have specific hazard language. Action in capacity building references identifying additional hazards, risks, and vulnerabilities. The subcommittee added reference to high winds and heavy rain/hail/sleet to the strategy.</p>
5	11/7	<p>P1, S3 aims to "advance equitable resilience", but neither of the actions addresses that.</p>	<p>This language relates specifically to the statutory charge. There are strategy tables that cover the foundational criteria and discuss equitable program design.</p>

6	11/7	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?	There is not a one size fits all solution to the issue of relocation, but it is a part of the toolkit and assessment referenced in actions in this section. P2, Strategy 3, Action D addresses the concern around relocating water and wastewater treatment facilities.
7	11/7	Increase efforts and funding towards pollution prevention programs at wastewater facilities - unclear what the link is to resilience or climate change?	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. There is a funding benefit to tying the co-benefits of reducing water pollution to reducing flood risk.
8	11/7	Water infrastructure description in Pathway #2 does not match well with how we talk about water infrastructure in Vermont.	The council was concerned about the water infrastructure text not being matched with ANR terminology. However, this alignment is now happening and the subcommittee has coordinated with DEC to incorporate changes into the text to ensure alignment with water infrastructure program at DEC.
9	11/7	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	After further discussion with the Council and subcommittee, this action will be removed from the subcommittee's recommendations.
10	11/7	Pathway 4, Strategy 1 talks about pre-empting sprawl, but the actions don't seem well-matched to this pathway/strategy.	Compact settlement/sprawl actions have been moved to section 15 – cross-cutting pathways. The subcommittee has edited the paragraph to remove the reference to pre-empting sprawl. Drafted a new component to capture more framing around infrastructure investments that support more resilient communities, while 1. acknowledging that as of now, the actions are all related to water systems, and 2. avoiding the emphasis on sprawl. As we continue to build up this work, there will be other actions identified related to mobility infrastructure and energy supply that would fall under this strategy, and that this can be the placeholder for those when they are identified.
11	11/7	Felt like drought impacts on drinking water systems was absent from draft.	P2, S1 references understanding source water vulnerabilities. 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. Drought is referenced several times across actions.

12		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.	This strategy is 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.
13	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?	This language will be amended so that the recommendation speaks to funding Weatherization Navigators 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.
14	11/8	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?	The PACE program for residential did end and reference to that will be removed from the action. A new action will be added that references exploring Commercial PACE for municipalities. New action will also referenced other funding programs that could be elevated to include: <i>bonding to support a statewide Tariffed On-Bill Finance Pilot and funding for a revolving loan fund for Public-Serving Institutions with retrofits. There may also be a need to continue providing the funding to support interest rate buydown (IRB) in EVT's Home Energy Loan and Business Energy Loan programs.</i>
15		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.	Most recommendations have to do with capacity (people) to establish metrics; need vulnerability assessments at different scales and sectors first before those metrics can be established. Resilience metrics are not as simple as GHG mitigation metrics to set and measure. More work needs to be done to frame up resilience, goals, and levels of implementation. The measuring and assessing progress section of the CAP will discuss further work needed in this area.
16		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,	See above response to comment #13.

		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.	
17		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.	Action will be changed to state Community Action Agencies and support networks in relation to establishing a state led Individual Assistance program.
18		When you say 'toolkit' is it the Climate Resilience Toolkit that already exists OR a new one to be developed?	This action is in reference to a statutory requirement, and we plan to rely in large part on pre-existing toolkits. Reference to the NOAA Climate Resilience Toolkit will be added to that action.
19	11/8	Include logging industry in the discussion of further impact assessment for ski and sugaring industries.	Action will be changed to reference Vermont's natural-resource-based industries such as but not limited to: ski industry, sugaring, logging.
20		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 Service Storymap 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/	Framing for Pathway 1 and entire section of CAP will be revised to reference and better frame natural hazards.
21		Line 35: "flooding poses" – clarify that this is fluvial erosion flooding, not (for the most part) inundation flooding.	Vermont experiences both fluvial erosion flooding and inundation flooding and both hazards are exacerbated due to climate change factors. While many events are characterized by fluvial erosion, flooding of Lake Champlain in spring 2011 demonstrated the significant hazard inundation flooding also poses. We will maintain the same language so as not to narrow the hazard profile addressed in the CAP.
22		Line 503 action A – fossil fuel collection for whose use/where is this reported?	Action B references the need is for data at a municipal level for public use. Action A will be rephrased to note the required collection of municipal operations fossil fuel usage data.
23		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	Language revised to read: Seek federal and other non-Vermont rate payer funding to the extent possible to assist low-income

	<p>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.</p>	<p>homeowners to upgrade electric service to 200 Amps. Electric utilities and renewable energy developers could provide new incentives and financing options through third-party financing mechanisms, on bill financing, RES Tier III incentives¹, third-party power purchase agreements, and infrastructure grant support. All programs must include equal access to renters.</p>
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¹ <https://publicservice.vermont.gov/content/tier-iii-renewable-energy-standard#:~:text=Tier%20III%20%E2%80%93%20Energy%20Transformation&text=For%20Tier%20III%2C%20the%20RES,until%20reaching%2012%25%20in%202032.>