

Summary of Key Issues

Survey Responses – Ag & Ecosystem and Rural Resilience & Adaptation Subcommittee Pathways, Strategies and Actions.

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7 responses

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Building Resilience and Adaptation in Communities and the Built Environment

Eliminate statutory barriers to school and municipal solar participation

- The recommendation does not account for customer cost-shift that occurs through net metering.
- 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.
- 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.

Water infrastructure language not aligned with typical approach

- General concern that the water infrastructure pieces are not well-matched with ANR priorities around water infrastructure resilience
- Water infrastructure description in Pathway #2 does not match well with how we talk about water infrastructure in Vermont.

Relocating some villages?

- Should we 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?

Road funding recc – should it be in here?

- 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

Missing issue - Drought impacts on drinking water

- Felt like drought impacts on drinking water systems was absent from draft.

Include high winds and heavy rain/hail/sleet in P1, S1:

- The climate impacts for which the toolkit should help towns in planning should include high winds and heavy rain/hail/sleet.

Advance equitable resilience

- P1, S3 aims to "advance equitable resilience", but neither of the actions addresses that.

Communication Action Agencies

- 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.

Add relocating wastewater treatment facilities?

- 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?

Pollution prevention programs at wastewater facilities – what's the link?

- Increase efforts and funding towards pollution prevention programs at wastewater facilities - unclear what the link is to resilience or climate change?

Pre-empting sprawl – where are the actions?

- Pathway 4, Strategy 1 talks about pre-empting sprawl, but the actions don't seem well-matched to this pathway/strategy.

Strategy 3 actions not well-aligned to strategy

- 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.

Weatherization navigators

- Under Pathway 3, Strategy 2, 2nd to last bullet point - 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?
- Can it be expanded? This kind of service might also be housed at the Community Action Agencies, Efficiency VT or elsewhere.

PACE program still around?

- 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?

Similar/overlapping strategies with other Subcommittees:

- Not enough to resolve now, but after Dec 1 and after gathering additional stakeholder input. Some areas:
- 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.

Next steps

- 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.

Sequestration and Storing Carbon

"Prohibiting expansion" on existing biomass plants.

- One plant, Ryegate, is a merchant plant that has a contract through 2024 through statute and would have to present specific beneficial upgrades to extend (through legislation - would be reviewed).
- The other is McNeil, jointly owned by utilities led by Burlington Electric, and it supplies a relatively substantial amount of BED's generation, baseload, with specific forestry practices.
- BED is looking to utilize McNeil for **district heating** along with electricity. I don't know at this point whether "expansion" however denominated would fall within the plans for either facility and would not expect to support a prohibition as to existing facilities without further understanding of impacts.

- A revision to apply the prohibition solely to new electric facilities would not concern me (strike "expansion of current"), and if the intent on current facilities is to limit future current facilities making changes that would create a higher nameplate capacity for electricity production - rather than any 'expansion' as drafted, which could in theory include improvements/upgrades including those that would extend the life of the facilities - then I may be able to support it, but do not expect to be able to do so as drafted. It would have to be more nuanced than currently drafted as to those facilities.
- Suggest "large scale" and "industrial scale" be defined by kw or other metric.

Changes to Renewable Energy Standard

- There are a couple recommendations on changes to the Renewable Energy Standard - one on forest products and one on planting trees - that I would need more information on to understand before considering support. (PSB is PUC too - text change)
- I don't have a suggestion on language or specific possible revisions - I don't understand what those recs are or what they would do/affect in RES

Ban on biomass for thermal heat?

- Recommending a ban on biomass for thermal heat has significant implications that need robust discussion; unprepared to currently support
- Entire narrative around biomass for thermal heat raises concerns

Sustainable harvest of pellets?

- Under Pathway C-5f suggest sustainable harvest be defined, preferably to include ecosystem integrity and not just forest regeneration

Coordinate with other states on Federal Farm Bill

- Not sure of latest efforts of Northeast Sustainable Ag Working Group, NOFA-VT, and others, but would encourage Vermont to build alliance with other eastern mountain states to create strong Federal Farm Bill platform and engage with National Sustainable Ag Coalition and others for farm and forest initiatives that support these pathways and strategies.

Transformational change and existing programs

- Places in the draft speak to transformational change, but then actions rely largely on existing programs (with no clear proposed modifications) administered by AAFM; feels inconsistent

Pull monitoring and assessment into a separate section

- Section that speaks to the need to "Create a system for tracking and accounting metrics and indicators for natural and working lands." should be pulled into the monitoring and assessment write-up being developed by SDSC. Research actions pulled out into a separate section of the CAP.

Careful with jargon and level of detail

- The structure, level of detail, amount of jargon, etc. in the strategies and actions varies among the sub-committees.

Gross versus net emissions and the findings of the RFP

- OK with “VCC should consider,” based on the findings of the RFP, recommending an inventory that includes ent GHG emission accounting.
- However, my concern is that the GWSA was clearly written to achieve gross, not net, emissions reduction targets for 2025 and 2030. While I am all for improved tracking in terms of transparency, accuracy, and confidence both re: gross agricultural sector emissions in the Inventory and re: net agricultural sector (and other land use) emissions (sources and sinks) in the carbon budget, I think we need to be clear and consistent that the 2025 and 2030 statutory emissions reduction requirements relate to gross emissions reductions and that net sinks should not apply to meeting those targets.

Adaptation and Building Resilience in Natural and Working Lands

Consolidate and harmonize compact settlement recs:

- Pathway F should be moved to the Compact Settlement section.
- 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.
- 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.

Renewable energy siting issues (Pathway F – 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.
- 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.

- Is there room to talk about finding ways to use land for both ag and solar farms -- such as using fields w/ solar panels for grazing, etc?
- Why call out renewable energy development differently than any other development?

Connection between food insecurity and climate change

- I think it would be valuable to add some explanation about the connection between addressing food insecurity and climate change.

NRCS Ecosystem Restoration Program

- Suggest we add language about making NRCS Ecosystem Restoration Program more efficacious and accessible for Vermont in wake of disasters

Statewide land use plan and planning office

- 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.
- 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;
- 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.

Regional agricultural economic development strategies

- Pathway E-1 - suggest development of specific regional agricultural economic development strategies that would include many of the individual strategies listed under that pathway. Examples include <https://www.orangecountygov.com/DocumentCenter/View/1425/Agricultural-Economic-Development-Strategy-2004-PDF>.

RAP farms and VAAF

- “Jurisdictional RAP farms are eligible to apply for VAAF 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.

Mitigation in Agriculture

Encouraging woody vegetation on existing ag lands or new?

- Need clarity about whether agroforestry and silvopasture is focused on incorporating woody vegetation into existing agricultural lands or opening up new areas (existing forestlands) for agriculture, and which scenario the presented benefits apply to.

Equity and access to existing programs

- Concerned about equity for many action pointing to existing programs at AAAPM; could be read to say that existing programmatic framework is fully equitable because it offers funding to all farmers; I don't believe this is like the case and suspect that smaller farms are challenged by a number of these practices that require specialized equipment that is harder for them to access/utilize

Coordination on fed policy with other states

- explore means by which to make federal ag policy and programs work better for Vermont. This could be accomplished through strengthened alliances with other Eastern mountain states. If not being done at present, develop data and reports on conversion of farmland to other uses.