



10. Progress Assessment and Implementation

In addition to preparing this 2025 update to Vermont’s Climate Action Plan, the Climate Council, as supported by the Climate Action Office, continues to track progress of efforts to implement the *Initial Vermont Climate Action Plan* and the additional requirements of the [GWSA](#). Substantive progress has been made in a number of the focus areas identified in the Initial Plan—efforts that were accelerated by unprecedented federal funding that has been available to Vermont over the last several years to invest in existing and new programs. As a result, spending on climate action has steadily increased since the adoption of the Initial Plan. There are challenges ahead, however, that will change that picture.

Federal Funding

Under the current federal administration, Vermont has already (in 2025) experienced and anticipated further reductions in federal investments. Funding through the American Recovery Plan Act has always been slated to wind down in late 2026, but federal funds from laws like the Inflation Reduction Act and the Bipartisan Infrastructure Law (also known as the Inflation Investment and Jobs Act) appear increasingly vulnerable to rollback and rescission. There is also growing risk of the loss of sustained federal funding for critical programs like the [Climate and Health Program](#) at the Vermont Department of Health. In addition, the tariffs implemented by the current administration have created uncertainty and raised the cost of many of the materials and equipment needed in the transition to electric vehicles and home-heating systems.

State Funding

Over the past four years, state funding has been used to advance key initiatives from the Initial Plan—from flood preparedness and recovery to the Green Savings Smart program that supports low-income Vermonters accessing energy-related grant funds. New funding sources will be necessary if we want to continue to sustain the current pace and scale of climate action, to say nothing of achieving the pace and scale needed to fulfill the obligations created by the Global Warming Solutions Act.

Progress Made Since the Initial Climate Action Plan

Since the *Initial Vermont Climate Action Plan* was adopted, several administrative and legislative actions have been taken. The Climate Action Office detailed progress across all the pathways, strategies, and actions as the Council began its work to update the CAP in the spring of 2024 (see [Appendix 3: 2021 Climate Action Plan Progress](#)). These efforts include programmatic initiatives to build landscape-level resilience and reduce climate pollution as well as several detailed technical studies necessary to better understand the mechanics and the costs of different possible approaches to achieving required emissions reductions. Specific progress and data related to the emission reduction requirements can be found in Chapter 15, Scientific Underpinning of Emissions Reductions.

While it is clear that real progress is being made, such an unprecedented rise and equally precipitous fall in federal funding reveals the imperative for Vermont to prioritize and quantify the benefits and costs of the respective initiatives that comprise the CAP.

Effective, equitable implementation will require the development of an implementation plan that strives to reconcile the initial public and private capital outlays for materials and new equipment with the long-term climate benefits and value that come from beneficial electrification and creating more resilient communities—while knowing that there are many competing demands for finite public and private dollars.

Adopting Advanced Clean Cars II

Of note, the Initial Plan and GWSA required the Agency of Natural Resources (ANR) to adopt by December 2022 California's Advanced Clean Cars II (ACC II) Regulations (amending Vermont's existing Low and Zero Emission Vehicle Regulations), Advanced Clean Trucks Regulations, the Heavy-Duty Low NOx Omnibus, and the Phase 2 Greenhouse Gas Rule for Trucks and Trailers. These rules set and amend standards for auto manufacturers and reduce greenhouse gas and criteria air pollutant emissions from passenger cars, light-duty trucks, and medium- and heavy-duty vehicles, along with engines that are delivered for sale or placed in service in Vermont. They also require auto manufacturers to deliver more lower-emitting and electric vehicles to Vermont. This work was initiated and conducted pursuant to the GWSA and in accordance with the procedures for administrative rulemaking in the [Vermont Administrative Procedure Act](#) (APA).

Given the scope of these rules and the tight timeframe in which ANR was required to act, this was a significant undertaking that drew from resources and staff not only within ANR and other state agencies, but also from regional organizations and partnerships that have supported work in this space for decades. The GWSA requires a series of reports, rule record sharing, and public engagement in addition to the requirements of the APA, and ANR engaged with the Climate Council, the Legislature, stakeholders, and the public to fulfill these requirements.

To adopt the Advanced Clean Cars II rules, ANR led a robust public engagement process to meet the enhanced outreach requirements of the GWSA. ANR hosted multiple meetings in areas and communities that have the most significant exposure to the impacts of climate change, including disadvantaged, low-income, and rural communities and areas. In-person meetings were held in Manchester, Newport, Bellows Falls, Barre, and Burlington. Two virtual meetings were held, including one that focused specifically on the medium- and heavy-duty vehicle rules. ANR received 236 written comments in favor of the rules and 27 written comments opposed. Over 300 individuals and entities signed on to written comments, which were responded to via a responsiveness summary that was filed with the Final Proposed Rule. On November 17, 2022, the Legislative Committee on Administrative Rules approved the rules and ANR filed the adopted rule with the Secretary of State on December 1, 2022, meeting the requirements of the GWSA. The rule amendments were effective on December 16, 2022.

In early June of 2025, however, Congress passed Congressional Review Act resolutions to nullify three Environmental Protection Agency waivers granted to California that underpin these rules; President Trump has since signed the resolutions. While certain to face legal challenges, this action effectively repealed California's authority to enforce these stricter emissions standards, which Vermont had also adopted. Given the uncertainty caused by this specific congressional action coupled with many of the other challenges noted above, enforcement of these rules has been paused by [Executive Order of the Governor](#), calling into question whether the emissions reduction benefits that had been anticipated from these rules can be achieved under their original timeline.

These rules were anticipated to have the greatest impact on climate pollution of any of the initiatives that have been advanced from the Initial Plan, so if they are delayed or rolled back, Vermont will be further challenged to meet its emissions reduction targets in the transportation sector.

Beyond the Clean Car and Clean Truck regulations, legislative action has helped advance several other important recommendations in the Initial Plan. These initiatives largely now sit with Executive Branch agencies charged with their implementation. The complete list of legislative actions that have advanced with relationship to the Initial Plan can be seen in Table 10.1.

TABLE 10.1: Legislative Actions Advanced Since the Initial Climate Action Plan

Bill	Year	Summary
Act 121, Flood Safety Act	2024	Establishes a minimum state floodplain standard; expands regulation of development in river corridors; improves dam safety; and enhances wetland restoration to improve our collective flood preparedness, climate resilience, and water quality.
Act 143, Flood Response Act	2024	Creates the Community Resilience and Disaster Mitigation Fund to assist municipalities with infrastructure projects; creates stronger coordination of first responders; includes public works employees in planning and benefits; requires more comprehensive local and regional emergency planning; updates and clarifies stormwater utility statutes; improves emergency communications translation and interpretation services; supports the state's swift water rescue operations; and provides additional support to all communities that were flooded in 2023.
Act 122, Climate Superfund Act	2024	Authorizes the state to recover financial damages from fossil fuel companies for the impacts of climate change to Vermont, and funds recovered support climate adaptation projects.
Act 179, Renewable Energy Standard	2024	Requires Vermont's electric distribution utilities to source 100% of their power from renewable sources by 2030 for large utilities and by 2035 for smaller, municipal utilities.
Act 181, Act 250 Reform and Housing	2024	Comprehensive reform of Act 250 jurisdiction, criteria and administration supports expanded housing opportunities, smart growth and new protections for forest blocks, habitat connections, and other critical resource areas.
Act 148, 2025 Transportation Program	2024	Contains numerous statutory amendments and funding authorizations related to transportation; requires VTrans and ANR to study the impacts and benefits of Vermont joining a cap-and-invest program.
Act 142, Public Utilities Commission Miscellaneous Changes (includes tweaks to the Clean Heat Standard)	2024	Makes technical clarifications to certain fees related to energy storage facilities; expands the jurisdiction of the PUC; requires a report focused on low- and middle-income households; and establishes new Energy Savings Account requirements.