



**Monday, October 4th 2021**

To the Vermont Climate Council,

First of all, thank you for the incredibly difficult and important work you are doing, and the diligence with which you are approaching it in these impossible times we're living through. Laying out a plan to transform so much of our economy and society would be a tall task at the best of times, and we want you to know that your hard work is not going unnoticed.

Many of our organizations will be submitting specific recommendations for pathways and actions to include in the Climate Action Plan. Today, we are writing to urge you to follow a number of core principles as you craft a Climate Action Plan that meets the scale of the crisis before us.

Significant parts of the world are literally on fire, and big portions of the rest of the nation are (or were recently) underwater. Vermont itself has recently missed being hit by not one but two massive tropical storms by mere miles, and earlier forecasts for the path of both Henri and Ida warned they might go directly through our state. And, of course, Vermonters are already experiencing more extreme heat and heavy precipitation events climate scientists have predicted for years.

The cost of the status quo, of places like Vermont that grasp the existential threat this emergency poses continuing to fail to address its causes, is too high to be allowed.

The time for aspirational goals and lofty rhetoric is long past. It's well beyond time for us to do what it will take to eliminate carbon pollution in Vermont, make our state far more resilient to the impacts of the climate crisis, and ensure that in doing both we are advancing equitable outcomes and enabling all Vermonters to be part of this transition.

Our organizations have been following the work of the Climate Council Subcommittees, and many of the principles we lay out below are informed by the important work of each of the Subcommittees. These recommendations are focused on what we believe must be included in the Climate Action Plan itself, rather than recommendations about the Council or public engagement processes, both of which are, of course, also important.

We firmly believe that for the Climate Action Plan to succeed, it must incorporate the following principles:

- First and foremost, **the totality of the Plan must achieve Vermont's statutory climate pollution reduction targets.** The Plan must meet our 2025 targets and should be effectively setting us on the path to meet our 2030 targets and beyond. Vermonters understand the need to act to avert the worst of the climate crisis. Every place in the world which grasps that reality must act like our future depends on it - because it does.
- **We cannot and must not allow Vermonters to be left behind as we transition to cleaner, better sources of energy** and ways of using it. This Plan, and this transition, provides an incredible opportunity to address head-on systemic inequities, injustices, and racism that are pervasive in our society. **The Plan - and the programs and initiatives it proposes - must prioritize those most impacted by today's inequities and tomorrow's climate impacts,** especially but not only BIPOC and lower-income Vermonters. We must design a suite of programs that are truly accessible to all. The Plan must also **prioritize recommendations that advance the clear targets, data tracking, mapping, and inclusive public input necessary to determine the degree to which Vermont's climate programs and initiatives are serving historically marginalized and EJ communities,** and make clear that programs should be modified and refined as needed to achieve those ends.
- **For the good ideas in the Plan to achieve their goals, they must be funded, fully and over the long term.** We can talk about incentives and solutions, but if we're not investing public funds in those solutions at the scale necessary to get the job done (and today, we're clearly not), we will fall short. Truly advancing equity and ensuring these solutions are available to everyone will cost more in the short term but will save Vermonters tremendously in the longer term. Just like cutting carbon pollution, success in advancing equity requires a significant investment - and is a responsibility we cannot shirk.
- **The Plan must not put forward false solutions to the climate crisis.** We cannot afford to shift, incrementally, to the "less bad" option. The Plan must therefore appropriately incorporate accounting of lifecycle emissions to create objective measurement criteria capable of creating wise policy outcomes.

- While the central requirements of the Solutions Act are clearly about cutting Vermont's carbon pollution, with the climate crisis already upon us and bound to get worse under any scenario, there is no question: **Vermont must take very seriously its responsibility to advance resilience, and the Climate Council should adopt ambitious goals and metrics for resilience and adaptation.** Our physical infrastructure (our roads, bridges, power grid, etc.) and our communities are all too vulnerable to the impacts of the climate crisis. We urge the Council to put forward significant recommendations to advance resilience and adaptation - especially for communities, such as our rural communities and those in flood hazard areas, that are likely to bear an outsized share of the impacts of this crisis.
- **The Plan must empower and recognize the role that our natural and working lands play in presenting solutions to climate change.** Vermont's farms and forests present unique opportunities to help both our human and natural communities adapt to a changing climate, while simultaneously sequestering and storing carbon and supporting our land-based economy, on which Vermonters rely.
- **Vermont must invest in the human infrastructure needed to make this transition possible.** Incentives, financing options, built infrastructure investments, and more are essential to opening up clean options to every Vermonter. But they aren't enough by themselves. To ensure that the people of Vermont are aware of all of their options, and the incentives and programs available to them, we must recognize that this is a significant undertaking that will require people- power to make it successful. While it may save money in the short term, **failing to invest in staffing at the State and partner agencies and organizations, or in accessible job training programs to implement clean energy infrastructure, is a recipe for failure.**
- **Similarly, we must not give short shrift to the supportive activities that will enable the success of the programs the Plan puts forward, including but not limited to education, community outreach, translation and interpretation services, and marketing.** These essential activities are often seen or described as "overhead," which decision makers try to minimize within program budgets. We can scrape by, making incremental progress with that mentality, but to ensure *everyone* understands their options and ultimately participates in this transition, we must set aside that short-sighted view and invest in the staffing and full suite of activities needed for programs to succeed.
- **We're all in this together. No entity, no matter how large or politically powerful, should get special treatment to duck their obligations to cut climate pollution while Vermonters do the hard work of reducing their own pollution** - every sector, every industry, every producer of climate pollution must be part of the solution and do its part to cut Vermont's climate pollution in line with the Solutions Act's requirements. The Plan must reflect that.

- We urge you to **stay on the lookout for unintended consequences, especially those that would place disproportionate burdens on and distribute inequitable, inadequate benefits to historically marginalized communities in Vermont.** The rubric created by the Just Transitions Subcommittee will be a valuable tool to help with this analysis. **The programs and initiatives put forward in the Plan must be additive,** and where they may replace or reduce funding for existing programs, that needs to be deliberate and very clearly create a significant net benefit to the state's efforts.
- To achieve the 2025, 2030, and 2050 requirements of the Global Warming Solutions Act, **the Plan must include many large and small strategies and actions and it must sequence them over the course of time.** Meeting the 2030 and 2050 goals requires planning for those goals today. It would be a mistake to leave important strategies and pathways out of the plan, focusing only on more immediate actions.

We know each Subcommittee has many considerations as they craft their recommendations, and we appreciate you considering this input.

**Thank you again for your work. Together, we can get this done.**

350VT

Audubon Vermont

Conservation Law Foundation

Lake Champlain Committee

Renewable Energy Vermont

Rights and Democracy Vermont

Vermont Affordable Housing Coalition

Vermont Businesses for Social Responsibility

Vermont Chapter of the Sierra Club

Vermont Climate & Health Alliance

Vermont Conservation Voters

Vermont Interfaith Power & Light

Vermont Natural Resources Council

Vermont Public Interest Research Group

Vermont Yankee Decommissioning Alliance