

**Vermont Climate Council**  
**Report to the General Assembly**  
**January 15, 2026**

## Introduction

This report is required by §591 of the [Vermont Global Warming Solutions Act \(GWSA\) of 2020 \(Act 153\)](#) enacted by the Vermont Legislature on September 24, 2020. The Act requires the Vermont Climate Council (VCC) to report on its activities and progress towards meeting the greenhouse gas reduction requirements in the Act. Understanding that this is an annual report and intended to inform, in part, future legislative action, we invite the Legislature to provide feedback on the report and recommendations for the Council to consider around what you'd like to see included or removed from future reports.

The Climate Council and ANR Climate Action Office welcome questions and requests for testimony. A request for testimony should come through the Agency of Natural Resources (ANR). When the legislature makes a request to ANR for testimony from the Council on specific topics, a process has been approved to determine how a decision is made for who will respond. ANR will reach out to the relevant Subcommittee co-chairs. For general requests, ANR will reach out to the Steering Committee members appointed by the body making the request to ensure the correct representative is available.

Most notable in our report this year is a discussion on the update to the Climate Action Plan which is discussed below. Recognizing the breadth of the initial 2021 Plan that includes more than 250 recommended actions, in this update to the Plan, the Council has highlighted [52 priority actions as well as a short list of 10 highest priority actions](#). Creating a short list of highest priority actions was done in direct response to public input. These highest priority actions intentionally address investments needed to both reduce climate pollution and help Vermont communities become more resilient. This plan emphasizes actions that:

- Support Vermonters in adopting more efficient and less climate polluting sources of home heat and transportation, with particular attention to the needs of Vermonters living on low and moderate incomes.
- Make investments in resilience, preparedness, and community development that will reduce climate impacts, help Vermonters recover more quickly and save money and lives as Vermont faces future climate hazards.
- Invest in building the workforce which is essential to robust climate action.
- Identify sustainable, long-term funding to support the significant investments needed to fulfill the vision of this plan and the GWSA.

The specifics behind this work are discussed in greater detail here within.

## Background

As adopted in 2020, core elements of the GWSA include:

- Codifying Vermont's greenhouse gas (GHG) emission reductions goals as statutory requirements and providing an explicit cause of action should the State fail to adopt sufficient measures to achieve the statutory requirements. The requirements are:
  - Not less than 26% from 2005 greenhouse gas emissions by January 1, 2025;
  - Not less than 40% from 1990 greenhouse gas emissions by January 1, 2030; and,
  - Not less than 80% from 1990 greenhouse gas emissions by January 1, 2050.

- Establishing the Vermont Climate Council (VCC), responsible for the development of a comprehensive Climate Action Plan

The VCC is comprised of 23 members, including eight ex-officio members of the Executive Branch, eight members appointed by the Speaker of the House, and seven members appointed by the Senate Committee on Committees. Given the breadth and complexity of the Council's work, the VCC established a Steering Committee to guide the overall process and ensure progress of the work across Subcommittees. The Steering Committee is comprised of two individuals from among the Council's Executive Branch members and four individuals from among the VCC's members who were appointed by the legislature (two who were appointed by the House of Representatives and two who were appointed by the Senate). The members of the Council and its Steering Committee, along with Councilor's biographies, are all available on the ANR Climate Action Office's [website](#). The website is maintained by the Agency of Natural Resources (ANR).

The GWSA charged the VCC with adopting the "Vermont Climate Action Plan by December 1, 2021, and submitting an updated plan at least every four years thereafter, and identified the following elements that must be included in the Plan:

- Strategies and programs to achieve the GHG emissions requirements established in §578 of the GWSA and adopting them in the Vermont Climate Action Plan;
- Strategies and programs that build resilience and prepare the State to adapt to the current and anticipated effects of climate change;
- Means to measure the State's progress towards meeting the greenhouse gas emissions requirements; and,
- Guidance to the Vermont General Assembly and the Secretary of the Agency of Natural Resources on legislative and regulatory changes necessary to implement the Plan.

In §591(b), the GWSA also established specific steps to be taken by VCC in developing the Plan, to include:

- Completing inventories of existing programs to reduce GHG emissions and build resilience;
- Identifying new strategies and programs that will be needed to meet GHG emission requirements and improve resilience;
- Developing financing strategies to support implementation of the work;
- Developing a monitoring strategy for tracking implementation efforts and assessing program effectiveness; and,
- Providing guidance to the Secretary of Natural Resources on rules needed to support implementation.

In addition, as identified in §592(d), the specific initiatives, strategies and programs identified in the Plan must further the following objectives:

- Prioritize the most cost-effective, technologically feasible, and equitable GHG emissions reduction pathways, adaptation and preparedness strategies;
- Provide for GHG emissions reductions that reflect the relative contribution of emissions

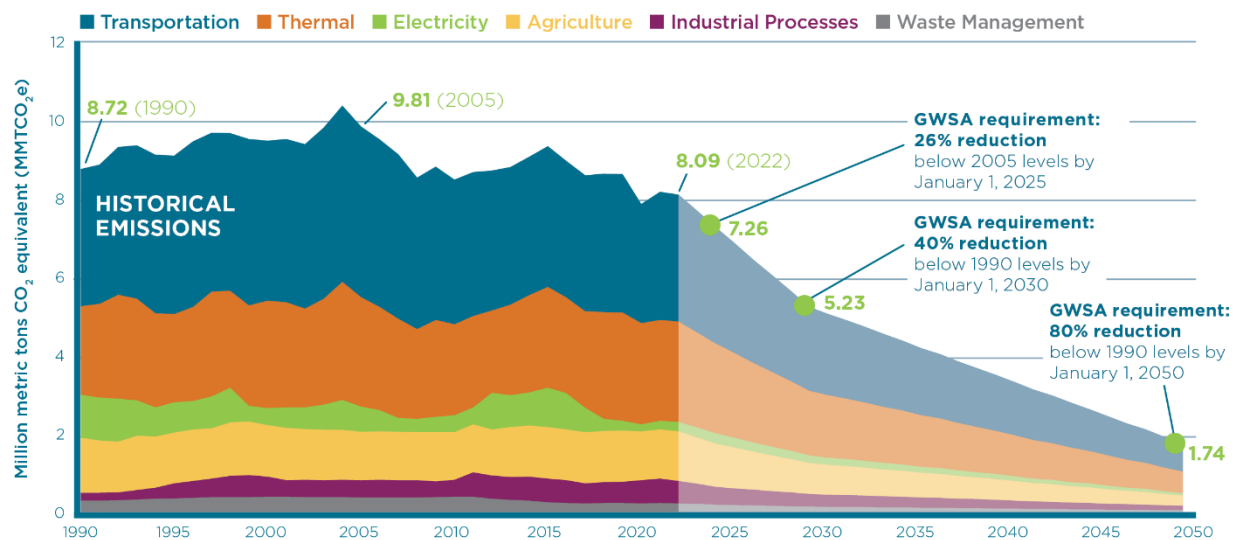
from different sectors;

- Minimize negative impacts on marginalized and rural communities and individuals with low and moderate incomes;
- Ensure that all regions of the state benefit from GHG emissions reductions;
- Support economic sectors and regions of the state that face the greatest barriers to emissions reductions, especially rural and economically distressed regions and industries;
- Support industries, technology, and training that will allow workers and businesses in the state to benefit from GHG reduction solutions;
- Support the use of natural and working lands to reduce GHG, sequester carbon and increase resilience; and
- Maximize the state's involvement in interstate and regional initiatives and programs designed to reduce GHG emissions, and build upon state, national, and international partnerships and programs.

## Status of Greenhouse Gas Emissions

As of this report, 2022 is the most recent year for which statewide greenhouse gas (GHG) emissions have been published by the Agency of Natural Resources, via the Vermont Greenhouse Gas Inventory and Forecast: 1990-2022. The historical statewide emissions reported in the Inventory, through 2022 are graphed below, as are the emissions reduction requirements established in the GWSA for January 1st of 2025, 2030, and 2050.

### Vermont's historical GHG emissions and future requirements



Source: Vermont Agency of Natural Resources, "Vermont Greenhouse Gas Emissions Inventory and Forecast: 1990-2022," 2025. Note: A small amount of emissions from the "fossil fuel industry" category (i.e., fugitive emissions from fossil gas pipelines in VT), accounting for 0.4% of Vermont's overall emissions in 2022, is not visible on this graph.



The first statutory GHG emissions reduction target in the GWSA was January 1, 2025, which represents the GHG for 2024. While the greenhouse gas inventory for 2024 will not be published until 2027, statewide fuel sales data for the transportation and thermal (or building heat) sectors for calendar year 2024 were compiled by the Agency of Natural Resources' Climate Action Office. Specifically, data from the Gasoline and Diesel Gallons Taxed Report from the Joint Fiscal Office

and the Fuel Gross Receipts Report for propane, fuel oil, and kerosene from the Department of Taxes became available in February of 2025. Reported fossil fuel sales volumes decreased in the thermal sector in 2024 as compared to 2023. At the time of this preliminary analysis, data regarding sales of natural gas in 2024 remains to be reported. Sales of gasoline and diesel fuel for transportation increased. Taken together, preliminary analysis of these data indicates no significant change in Vermont's year-over-year greenhouse gas emissions from these two sectors from 2023 to 2024.

Since the transportation and thermal sectors are the two largest sources of greenhouse gas emissions in Vermont, it appears likely that the January 1, 2025, Global Warming Solutions Act emissions requirement will not be met. However, these estimates are preliminary and will be officially confirmed when the Vermont Greenhouse Gas Inventory Report for 2024 is completed and released in mid-2027.

Although trend analysis is complicated by the effects of the COVID-19 pandemic, we are seeing signs of progress. Sales of gasoline are now approximately 26 million gallons (8%) lower than they were in 2019, and diesel sales are 2.5 million gallons (nearly 4%) lower. Sales of liquid heating fuels (primarily fuel oil and kerosene) have decreased every year since 2019 and were 38.2 million gallons (27%) lower in 2024 than in 2019. Propane sales volumes have varied since 2019 with 2024 sales just over the 2019 volume. Data from 2024 natural gas sales volumes are expected in the near future and will be incorporated into our analysis. Heating degree days have been trending lower for the past six years which decreases demand for heat, but there are indications that fuel use is decreasing more quickly than the decrease in heating degree days would suggest. The preliminary data for 2024 offer an important reminder about why it is critical to track fossil fuel use over time. While one year does not make a trend, it does provide a clear indication that more work remains to be done.

## Climate Action Plan

The Vermont Climate Council adopted its Initial Climate Action Plan in late 2021. In the nearly four years since the Plan was finished Vermont has experienced – and in many cases Councilors have personally lived through – a series of climate disasters, with many Vermonters still reeling from the disastrous flooding events across the state in the summers of 2023 and 2024. And while these flood events were particularly prominent, Vermonters are also experiencing other impacts of our changing climate including increased wildland fire activity in Vermont as well as air quality impacts from much larger wildfires burning elsewhere, impacts on livelihoods of farm and forest sector, algal blooms that limit access to a number of lakes and ponds and impact drinking water quality, and winter ice storms and rain-on-snow events that damage electric infrastructure causing some Vermonters to lose power for days. In addition, 2024 and 2025 saw extreme droughts creating damage and personal hardship. With these events in mind, the Climate Council adopted a new [Climate Action Plan on July 1, 2025](#).

As the Council worked to update the Plan, the Just Transitions Subcommittee supported the work by providing input and feedback on how the strategies and initiatives should be framed to benefit and support all residents of the State of Vermont fairly and equitably. The Council acknowledges

that to realize the transformative change that is needed to meet the goals of the GWSA, ongoing engagement with Vermonters is essential - both to receive broad-based input on possible approaches and better understand the barriers to implementation. One important lesson from the Initial Climate Action Plan was the need to involve Vermonters continuously and include their input throughout the entire update process. To achieve this in the Climate Action Plan update, engagement started in early 2024 and continued until the Plan was finished. Community input was shared with the Climate Council every three months via the Vermont Voices on Climate engagement summaries. This state-led engagement also aims to influence ongoing climate-related programs and systems in Vermont, beyond this update to the Climate Action Plan.

The Vermont Climate Council hosted events throughout the development of the Climate Action Plan to share information, answer questions, hear new ideas, consider community priorities, and receive feedback on work-to-date. These sessions focused on different themes from the various subcommittees and at key moments, community-based organizations and Regional 10 Planning Commissions supported and collaborated on these events. The timing intentionally lined up with key decision-making and drafting periods of the planning process. More than 850 public participants took part in a virtual or in-person input session. In addition to events, approximately 250 Vermonters or Vermont-based organizations submitted 119 written comments by email or through the Public Comment Portal during the public input process.

After April's engagement on the draft plan, the Council and Steering Committee met many times in May and June to consider input from public meetings and public comment and revise the Plan. Detailed considerations and changes can be found in the public engagement chapter. Priority Actions In the following chapters, the Council presents a significant and broad set of recommendations intended to guide climate action over the next four years.

Recognizing the breadth of the initial 2021 Plan that includes more than 250 recommended actions, in this update to the Plan, the Council has highlighted [52 priority actions as well as a short list of 10 highest priority actions](#). Creating a short list of highest priority actions was done in direct response to public input. These highest priority actions intentionally address investments needed to both reduce climate pollution and help Vermont communities become more resilient. This plan emphasizes actions that:

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Over the next four years, as the recommendations in this Plan are advanced, the Council encourages the legislative and executive branches to be mindful of the following in designing the policies and programmatic solutions:

- Minimize the financial hardship for low- and middle-income Vermonters through the intentional design, prioritization, and pacing of the programs recommended in the plan,

including how revenue needed to support these programs is raised and invested/distributed.

- Ensure balanced investments in both the efforts needed to reduce climate pollution and adaptation measures to strengthen resilience against current climate impacts.
- When evaluating the costs of programs and policies, take into account the costs of not acting, including Vermonters' continued dependency on price-volatile fossil fuels for home heat and transportation and the cost of rebuilding following all-but-certain future climate disasters.
- Ensure adequate funding to underwrite state agency capacity, create the administrative framework, and undertake the work needed to advance the actions in this updated Climate Action Plan.
- Identify revenue sources that don't work against Vermonters' adoption and implementation of key climate actions, such as adoption of electric heating and transportation options, by raising the cost of electricity.
- Ensure necessary supporting investments are being funded and implemented (e.g., residential electric panel upgrades, expanded availability of electric vehicle charging infrastructure, etc.)
- Support and develop enough trained workers in the state to implement the actions.

While the Legislature, the Agency of Natural Resources, and other agencies of state government will need to work to advance the actions put forward in this plan through legislative action and rulemaking, these efforts and other related work will be reflected in the next update to the Climate Action Plan, scheduled to be delivered in July 2029.

## Implementation Efforts

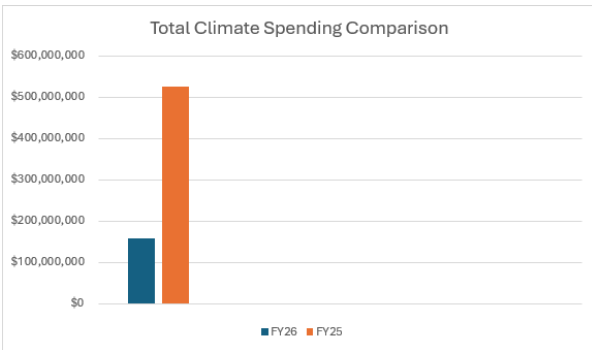
In addition to supporting the Plan development, the VCC continues to support implementation of the Initial Climate Action Plan and additional requirements of the GWSA. Many of the recommendations outlined in the CAP require legislative (i.e., statutory changes) and/or administrative action (i.e., rulemaking). Below is a full suite of legislative initiatives with ties to the CAP that were considered during the 2025 legislative session. The chart below shows all bills, whether advanced or not, and doesn't imply that the Council is supportive of all these efforts.

Bill	Summary	Update
<p><a href="#">S.65</a> An act relating to energy efficiency utility jurisdiction</p>	<p>This bill proposes to amend the legislative direction to the Public Utility Commission to require the energy efficiency utilities to prioritize greenhouse gas emissions reductions. This bill also repeals the Affordable Heat Act.</p>	<p>Returned to Senate Natural Resources and Energy Committee and did not advance this session</p>
<p><a href="#">H.125</a> An act relating to reporting on the energy transition</p>	<p>This bill proposes to require the Climate Action Office to report on the economic impacts of the transition to clean energy within the State.</p>	<p>Passed in the House, referred to Senate Natural Resources and Energy, failed to advance this session.</p>
<p><a href="#">S.50</a> An act relating to increasing the size of solar net metering projects that qualify for expedited registration</p>	<p>This bill:</p> <ul style="list-style-type: none"> <li>Increases the size of solar net metering projects that qualify for an expedited approval process from 15 kW to 25 kW.</li> <li>Sets a 10-foot setback requirement from roads and property lines for solar arrays up to 25 kW.</li> <li>Offers flexibility in managing RECs, allowing adjustments for systems commissioned between January 1, 2023, and July 1, 2025, by September 2, 2025.</li> <li>Eliminates requirement to report net metering systems to the PUC if already in land records.</li> <li>Requires the PUC to update net metering rules and define "plant" by November 1, 2025, considering land use and ratepayer impact.</li> </ul>	<p>Signed into law by the Governor May 28, 2025 and took effect July 1, 2025.</p>

Bill	Summary	Update
<p><a href="#">H.319</a> An act relating to miscellaneous environmental subjects</p>	<p>Includes repealing the requirement to adopt the Resilience Implementation Strategy by rule included in Act 122 last year.</p>	<p>Passed in the House, moved to the Senate Natural Resources and Energy Committee but failed to advance this session.</p>
<p><a href="#">H.289</a> An act relating to affordable climate initiatives</p>	<p>This bill proposes to change the Renewable Energy Standard to the Clean Energy Standard. It would utilize proceeds above projections from the sale of RGGI allowances for low-income weatherization and EV incentives. It would also make multiple amendments to the Global Warming Solutions Act, most notably shifting from a gross- to a net-emissions framework for assessing progress.</p>	<p>Did not pass the Committee on Energy and Digital Infrastructure and failed to advance this session.</p>
<p><a href="#">H.231</a> An act relating to technical corrections to fish and wildlife statutes.</p>	<p>This bill includes requires the Agency of Natural Resources to develop a Resilience Implementation Strategy by January 1, 2026. It mandates rulemaking to identify responsible parties for greenhouse gas emissions and establish cost recovery demands, with rules to be finalized by January 1, 2028. The State Treasurer is required to report on the financial impact of greenhouse gas emissions on Vermont, due by January 15, 2027.</p>	<p>Passed in the legislature and signed by the Governor June 5, 2025</p>
<p><a href="#">H.518</a> An act relating to repealing the Climate Superfund Cost Recovery Program</p>	<p>This bill proposes repealing the Climate Superfund Cost Recovery Program, ending the key provisions of the Climate Superfund Act (Act 122).</p>	<p>Did not pass the House Committee on Environment and failed to advance this session.</p>

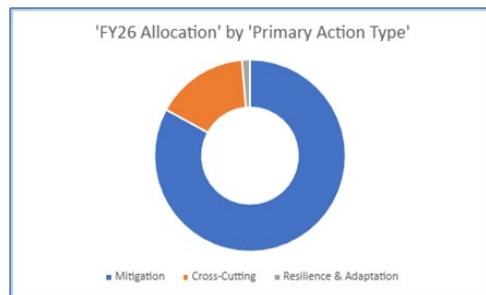
Bill	Summary	Update
<a href="#">H.62</a> An act relating to repealing the Global Warming Solutions Act	This bill proposes repealing the Global Warming Solutions Act and abolishing the Vermont Climate Council	Did not pass the House Committee on Energy and Digital Infrastructure, failed to advance this session.
<a href="#">S.68</a> An act relating to repealing the Affordable Heat Act	This bill proposes a full repeal of the Affordable Heat Act (Act 18).	Did not pass the Senate Committee on Natural Resources and Energy, failed to advance this session.
<a href="#">H.16</a> An act relating to repealing the Affordable Heat Act	This bill proposes a full repeal of the Affordable Heat Act (Act 18).	Did not pass the House Committee on Energy and Digital Infrastructure, failed to advance this session.
<a href="#">H.488 (Act 43)</a> An act relating to the fiscal year 2026 Transportation Program and miscellaneous changes to laws related to transportation.	Summarizes certain Fiscal Year 2026 investments intended to reduce transportation-related greenhouse gas emission, reduce fossil fuel use, and save Vermont households money. Requires the State to start collecting a mileage-based user fee from all battery-electric vehicles registered in Vermont by January 1, 2027. Provides that AOT shall consider opportunities to reduce vehicle miles traveled and greenhouse gas emissions as factors in various parts of the transportation planning process.	Passed in the legislature and signed by the Governor June 2, 2025
<a href="#">H.493 (Act 27)</a>	Section B(f)(2) appropriates \$275,000 from the General Fund for the purchase of a fire apparatus	Passed in the legislature and signed by the Governor May 21, 2025

In addition to the passage of new climate-related legislation listed above, the State’s FY26 budget includes funding directed at climate action, with \$159,382,377 appropriated and/or spending



authorized. However, the FY26 budget reflects a decrease in climate spending compared to FY25. The decrease reflects both the abrupt redirection of federal funding for programs such as “Solar for All”, as well as the winding down of time-limited federal resources from laws such as the Bipartisan Infrastructure Bill. In addition, staff have refined their accounting to not carry forward one-time funds from one fiscal year to the next even if they

have not been spent down. As such, there are more monies circulating in Vermont not reflected here from previous years. That said, we expect this to be the trend in the coming years rather than a one-off. Other valuable programs that funding will be spent down on soon include funding for weatherization across multiple programs deployed by the Office of Economic Opportunity and electric vehicle charging funding through the National Electric Vehicle Infrastructure program. These programs support direct climate solutions to Vermonters (weatherization of their homes) as well as the infrastructure needed to support Vermonters in making climate-smart decisions (purchasing an EV).



Overwhelmingly this fiscal year, investments are being used to support GHG mitigation programs, with the balance largely being used for resilience and adaptation work. That said, measures characterized as mitigation often also have resilience and adaptation benefits and so the buckets are not as neatly defined as they appear. Funding for weatherization, for example, is characterized as mitigation spending but has significant resilience and

adaptation benefits in making homes safer and more livable in times of extreme weather.

Looking ahead, the State faces challenges to sustain climate funding. To maximize climate action, the state will look for opportunities for collaboration of federal, state and local partnerships to drive climate action forward. By building upon climate investments and initiatives, State agencies will strive to sustain the momentum of these efforts to support a sustainable and just energy transition for communities across the State.

### Rulemaking

Vermont statute 10 V.S.A. § 582(g) requires the Vermont ANR to “research and adopt by rule greenhouse gas accounting protocols that achieve transparent and accurate life cycle accounting of greenhouse gas emissions, including emissions of such gases from the use of fossil fuels and from renewable fuels such as biomass.” Lifecycle accounting methodologies are an ever-evolving area of research and study; staff research on developing a protocol pursuant to 582(g) was started in 2016 but no protocol was adopted at that time. Since 2016, there have been advancements in the development and understanding surrounding lifecycle analyses. As a result, the Agency is now advancing a rulemaking process to adopt a protocol that will promote a transparent and consistent method for calculating lifecycle greenhouse gas emissions. The rule

provides a protocol for conducting a life cycle analysis for greenhouse gas emissions for products and energy pathways and ensures that the application of the protocol is consistently applied by state Agencies.

The Agency initiated a stakeholder process for the life-cycle analysis rulemaking in the summer of 2023 and filed a draft proposed rule with the Interagency Committee on Administrative Rules at the end of 2023. The process has been stalled as the Agency works to procure public access to the protocol for the public comment period which requires a contract to be developed. The protocol is a proprietary tool developed by ISO (the International Organization for Standardization) and is intended for the quantification of the carbon footprint of products. The state is close to securing a license that enables public access to the protocol for the rulemaking process. We anticipate reinitiating the rulemaking process in 2026.

In addition, the 2025 Vermont Climate Action Plan (CAP) includes the following request to the Agency of Natural Resources (ANR):

*Develop a framework for the reporting of greenhouse gas emissions data from fuel suppliers and other significant emitters of climate pollution. ANR will work expeditiously to put a reporting framework in place and recommend to the Legislature by December 15, 2025, statutory changes and funding needed to support streamlined reporting requirements and a stepped implementation plan.*

Consistent with that CAP action, the Secretary provided a recommended framework to the Vermont General Assembly and Climate Council for the establishment of a greenhouse gas (GHG) reporting program in Vermont. Should the Legislature choose to move forward with such a program, the recommended framework will produce emissions data that can be used to improve the state's greenhouse gas inventory as well as support future development of mitigation programs and policies.

In developing the recommendation, ANR analyzed two reporting frameworks: harmonization and standalone. Harmonization would have ANR staff compiling and reconciling various types of data collected by other departments, notably fuel sales data collected by the Departments of Tax and Motor Vehicles. The adoption of a standalone reporting rule, on the other hand, would have covered entities reporting GHG emissions data directly to ANR. It appears that a standalone reporting rule is most appropriate for Vermont.

A standalone reporting rule would allow ANR to define, collect, and analyze sufficient data to develop a robust estimate of statewide GHG emissions from covered sectors. It would also guard against gaps in important data sets that may otherwise arise as a result of federal rollbacks of data reporting requirements. However, the establishment and operation of a greenhouse gas reporting program requires significant investment, especially in the program's early years. The full scope of the program, timeline for implementation, and resources need can be found in the [memo](#) shared with the Legislature on December 23, 2025, accompanied with the [letter of support](#) from the Climate Council.

Additionally, consistent with Vermont's long-standing participation in California's clean vehicle programs, the Agency of Natural Resources will be advancing amendments to our Clean Car Regulations. As recommended in the 2021 Climate Action Plan, Vermont moved forward with the adoption of both the Advanced Clean Cars (ACC) II program and the Advanced Clean Trucks (ACT)

regulation. In recent actions, the federal government and other actors have sought to repeal California's (and thus Vermont's) authority to implement these regulations. The proposed amendments are responsive to concerns raised by vehicle manufacturers around regulatory certainty as legal challenges proceed at the federal level. Further, these amendments have no impact on and do not conflict with the Governor's Executive Order 04-25, which directed ANR to pause enforcement of rules that require vehicle and engine manufacturers to deliver battery electric and plug-in hybrid vehicles to Vermont for Model Year 2026. The proposed amendments have little to no cost impacts and aim to minimize potential negative emissions impacts.

### *Advanced Clean Trucks*

Proposed amendments to the Advanced Clean Trucks (ACT) regulation are consistent with commitments made by California in the Clean Truck Partnership on behalf of all states that participate in California's clean vehicle programs. Vermont and other states gave input to California on the proposed amendments which provide additional compliance flexibility to manufacturers. Most of the amendments pertain to the credit and deficit system manufacturers use to comply with Advanced Clean Trucks. The most significant changes proposed include (1) an increased deficit makeup period from one to three years which has the effect of delaying enforcement of ACT until 2030; (2) a new definition of how credits are generated allowing manufacturers credit when the vehicle is delivered for sale in Vermont rather than when they are sold to the ultimate purchaser; and (3) "pooling" provisions that allow manufacturers to use credits between states.

### *Advanced Clean Cars II Low Emission Vehicle standards*

The proposed amendment to the Advanced Clean Cars II Low Emission Vehicle standards (which apply to internal combustion engine vehicles) is necessary to address uncertainty created by recent federal actions against the California regulations that Vermont has incorporated by reference into our rule.

In June 2025, Congress claimed to revoke the waiver that had allowed California to enforce the Advanced Clean Cars II rule. On behalf of Vermont, the Attorney General's Office is currently challenging this action as invalid in federal court alongside ten other states. The congressional action has caused uncertainty and confusion for automakers about which regulations remain in effect.

To provide certainty, the proposed amendment allows manufacturers to make a temporary choice to certify new vehicles to the tailpipe emissions standards which have been in place since 2012 (ACCI), or they can certify new vehicles to the next generation tailpipe emissions standards (more stringent) that were slated to go into effect for model year 2026 (ACCII). Most vehicle manufacturers have already produced and delivered vehicles to Vermont certified to ACC II standards, since vehicle production and planning occurs years in advance. ANR's proposed amendment provides regulatory certainty and acts as a backstop to prevent backsliding to less health protective federal standards.

The GWSA requires the Vermont Climate Council to recommend tools for municipalities to use to assess their climate preparedness, assess financial capacity to address infrastructure resilience, and prioritize investments in that infrastructure. In 2022, staff in the CAO convened a task group to design a Municipal Climate Toolkit that would help Vermont municipalities act on climate change. The task group includes representation from municipal governments, regional planning commissions, State technical assistance providers, and non-profit partners.

The intent of the Municipal Climate Toolkit is to provide a hub for existing tools, resources, and information relevant for designing and implementing climate action measures or strategies at a municipal level. This work was completed in 2025 and can now be found on the [Climate Action Office's website](#). Minor improvements to usability are planned for 2026.

### *Technical Analyses*

ANR managed multiple requests for proposals and contracts this year to meet the requirements of the GWSA and support the work of the VCC. These contracts included professional facilitation services to support the VCC and Subcommittee meetings, outreach and engagement support, and specific technical analyses to inform revisions to the Climate Action Plan and meet the remaining requirements of the GWSA. The specific technical analyses that have been completed or are underway are as follows:

#### **1. Facilitation and Public Engagement Services**

In order to provide robust public engagement envisioned by the GWSA, ANR continues to maintain a contract with the Consensus Building Institute for ongoing facilitation and public engagement services work. In addition to facilitation services for the VCC, this contract supports both public and community engagement. Specifically, the Contractor supported public meetings to engage Vermonters in the development of the 2025 CAP described above.

The Contractor also supports targeted outreach with partner organizations and directly with community members. The focus is on building relationships that will allow more Vermonters to get involved in climate related issues. The approaches, which vary depending on the community and potential partner organization, aim to meet people where they are, improve awareness around relevant climate actions, and identify and understand priority issues for those communities related to climate action. The goal is not to immediately “get feedback” on the climate action and relevant work like the CAP, but rather create conversations that can be sustainable over time around climate action issues – how we heat and cool our homes, how we get to work and move around the state, how we use the land around us, how our families prepare for, and react to, threats such as flooding and heat waves. This work is being coordinated closely between staff in the CAO and ANR’s Civil Rights and Environmental Justice Unit.

While the final engagement report for 2025 is not complete, the quarterly report through the end of September can be [found here](#).

## **2. Development of the Climate Action Tracker Tool (formerly called the Measuring and Assessing Progress Tool)**

The ANR CAO, in support of the requirement in the GWSA, is advancing the development of a tool to measure and assess indicators of progress related to reducing GHG emissions and increasing resilience and adaptation to a changing climate in Vermont, as well as the implementation of actions in the CAP. The first phase of this project was completed in May 2025 and includes: determining which metrics and indicators to track; the formation of a data governance team; determining data sources and availability; and how to fill any data gaps for the chosen metrics. Phase two of this project will encompass the creation of the Tool itself to incorporate the data and information on metrics and indicators identified in phase one. Phase two will be contracted in the winter of 2026.

The development of the [Climate Action Tracker \(CAT\) tool](#) is a cornerstone of the work of the CAO and will be a core function of the Office. The CAT will support communications with Vermonters and the development of reports, such as the legislative report, over time.

## **3. Cap and Invest Program Analysis**

Act 148 directed the Agency of Natural Resources (ANR) and Agency of Transportation (AOT), in coordination with the State Treasurer and the Vermont Climate Council, to undertake a study to evaluate Vermont participating in a cap-and-invest program to reduce climate pollution, as well as other complementary emission reduction programs. A complete evaluation of program options and recommendations was prepared as part of the final study report and presented to the legislature on [February 15, 2025](#). The [technical report](#) that supported the Treasurer's Office in developing these recommendations can also be found on the [website](#) for the project.

## **Next Steps**

The work of the VCC is ongoing, and in service to future iterations of the Climate Action Plan. While the Legislature, the Agency of Natural Resources and other agencies of state government will work to implement climate action, the VCC will continue its efforts in several key areas, including but not limited to:

- Guiding on-going public engagement, including around recommended addenda to the CAP.
- Onboarding new Councilors appointed by the Legislature.
- Identifying the means to accurately measure the impact of implementation of the Plan.

Finally, like many of the bodies created by the Legislature, the Council does not have a dedicated staff and budget but rather relies on existing staff within state agencies to support its work. By and large these staff have positions that are not dedicated exclusively to climate action and have significant other roles and responsibilities within their agencies. This causes tension around how state staff support both the Council and the Plan development. This model can be sustained into

the future, but the capacity limitations are real and need to be considered as the VCC approaches the next plan update.

