

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

CHAMBER OF COMMERCE OF THE UNITED
STATES OF AMERICA, et al.,

Plaintiffs,

v.

JULIE MOORE, et al.

Defendants.

Civil Action No. 24-cv-1513 (MKL)

**DECLARATION OF KATIE TRAUTZ IN SUPPORT OF
MOTION TO INTERVENE**

I, Katie Trautz, declare as follows:

1. This declaration is based on my personal knowledge and experience.
2. I am a lifelong resident of Vermont and currently live in Montpelier, where I am employed as the executive director of Montpelier Alive. I am a member of Conservation Law Foundation.
3. Montpelier Alive started in 1999 as a business association for downtown Montpelier, Vermont, and in 2002 expanded its mission to support the economic vitality of downtown as a whole, encompassing tourism, beautification, and business. In my role, I've seen firsthand how climate change is affecting Montpelier's business community.
4. Montpelier Alive has more than 90 dues-paying members, most of whom are businesses, including restaurants, retail establishments, large corporations, and some nonprofits. Nearly all our members have been devastated by floods over the past two years. Montpelier's business community is still struggling to recover from these floods.

5. Montpelier has 8,000 residents. The heart of Montpelier is its small businesses and chef-owned restaurants. The downtown economy is driven by customers, both locals and visitors, patronizing these businesses and restaurants. Tourism is a big factor. Many businesses gain most of their revenue during the busy tourism period, which is from July to November. If tourism is interrupted, these businesses struggle through the rest of the year. Prior to the advent of remote work, state government workers also used to be a large part of the local economy. Business owners used to expect an influx of people in town during the legislative session, which is January to May, but we don't see that anymore.

6. The impacts of climate change harm the local economy. Climate change most drastically injures local businesses in the form of floods. Montpelier has flooded in July 2023, December 2023, and July 2024.

7. The July 2023 flood decimated downtown Montpelier. One hundred and forty businesses—most of downtown—were in the flood range and were damaged or outright destroyed. Initially, businesses were closed, inventory was lost, and the streets were a mess, effectively cutting off Montpelier from the outside world. Three to six months later, even as businesses reopened, people weren't coming to downtown because they didn't know that it was open for business.

8. Economic recovery is challenging and continues to this day. My understanding is that Federal Emergency Management Agency grants that may reimburse homeowners for damage from disasters aren't available to businesses. Because of this, businesses had to dig themselves into a massive financial hole to try to reopen. Many took out hundreds of thousands of dollars of debt to try to come back from COVID and then again following the flood.

9. The July 2023 flood also damaged nearly all of Montpelier's elevators and many remain out of service, including elevators in the library, office buildings, and most of the churches. The elevator in the Montpelier municipal building—where voting typically takes place up a flight of stairs—is still broken too. It's extremely hard to find elevator repair companies, and the broken elevators are posing real barriers to people with disabilities who are trying to get to work, attend church, vote, and more. Montpelier may be one of the most inaccessible towns in the nation right now.

10. Montpelier's economy is interconnected, so harm to one business hurts the others. For example, the Capital Plaza Hotel was damaged during the floods and had to be completely gutted. Not having a hotel in town during the high tourism season hurt other businesses. Montpelier's post office was also closed for over a year, and so businesses had to go to surrounding towns—a 20-minute drive at least—to send and receive mail, a huge hurdle for businesses that do online sales because they had to drive long distances to deliver their goods. And public gathering places, like libraries, schools, and churches, work in synergy with local businesses. Some of them have not reopened since the July 2023 flood, which means they cannot contribute to the local economy.

11. The December 2023 and July 2024 floods were smaller, and so did not cause as much physical damage. But they did contribute to the snowballing sense of uncertainty, which is disruptive to the local economy. Montpelier's businesses are losing faith that they can stay open through repeated floods and flood scares. They say that if they were hit as hard as July 2023, they wouldn't be able to come back from it again. And if that happens, then the lifeblood of Montpelier will disappear.

12. Floods are not the sole climate impact that harms Montpelier's businesses. For example, when wildfires in Quebec worsen air quality and visibility in Montpelier, this deters tourism and leads to event cancellations.

13. After the July 2023 flood, Montpelier Alive, in conjunction with the city of Montpelier, set up a volunteer hub. The hub organized volunteers to help with flood recovery, especially to dig out businesses and residents. Over the course of a few months, thousands of volunteers literally dug the city out of the mud. Volunteers were both locals and people who came from other parts of the country, including people who had themselves had been impacted by climate change events in their own hometowns.

14. Climate change impacts threaten Montpelier's community balance, confidence, and well-being. I support the Climate Superfund Act because it would provide financial assistance to support Montpelier's ability to put in place adaptation measures so we're better prepared for future events. Rebuilding back to normal may be impossible, but financial assistance can help assure the resilience of Montpelier, keeping it truly alive.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 26 2025.



Katie Trautz