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**Rural Vermont response and additional statement against carbon markets
regarding the revised
Ag Working Group Report v. 4.3**

Dear Stacy,

You know how much Rural Vermont has been engaged during our process in the Ag Working Group for the past four months and we are looking forward to diving deeper into this collaborative work in the planning phase ahead of us. Today, I unfortunately don't have the authority to sign-on for my organization to draft 4.3 of the ALWG recommendations for the inventory phase of the VCSI because of a lack of a timely formal review process for staff and board.

Act 59 calls for the Inventory Report by July 1, 2024 which is three months out from this week.

I recommended last Friday together with my suggested edits by email that v. 4.3 of the report could clearly state that it hasn't been formally approved by the stakeholders in the group - I think that could have avoided our formal withdrawal from signing-on to the report. While the process section mentions that the drafts were authored primarily by staff at VHCB and VAAF, Version 4.3 of the report does not indicate if and how the final version got reviewed and approved or rejected by the group. It simply states: "Drafts were reviewed at publicly recorded meetings of the ALWG." In fact, the last draft (4.3) was not reviewed at all at a publicly recorded meeting.

In my email on Friday I had also requested for the report to clarify in the process section that the ALWG is a group utilized by VHCB and ANR for information gathering (with support from VAAFM) and as such not subject to public meeting laws or formal decision making of the group. VHCB had explained this in a meeting to reason a lack of transparency of meeting recordings and notes of all other workgroups other than the ALWG. The ALWG itself was also not facilitated in a way that agreements about statements and recommendations were made in a formal way. The language in the report misses any reference to decision making autonomy of the agency leadership in the process and instead suggests through the language used that viewpoints represented in the report v. 4.3 would have been adopted by the group in some form (such as: The ALWG is hopeful, ...; The ALWG believes...; The ALWG draws heavily from ...; The ALWG puts forward this report...; The ALWG recommends...”). In comparing the version from 032824 to 4.3 I didn’t see any changes to this sort of framing in the report.

The last two drafts, which I both received only within the last week, had made significant changes and included new framing that the authoring agencies adopted from the UN and the PES & Soil Health Working Group that the ALWG did not have much or any discourse about. Specifically the language around soil health in context of the PES & Soil Health WG introduced framing diametrically opposed to the way that Rural Vermont, the White River NRCD and the Vermont Healthy Soils Coalition had requested to reference the work of that group. At the last meeting of the ALWG on March 29, Rural Vermont expressed confusion how the redraft didn’t mention any discourse against carbon markets that occurred in various meetings of the group but instead inclusion of language around ecosystem services - a framework that has only been discussed by the group as something that a 3 year public engagement process already occurred on about with the consensus against the adoption of a new performance based program. We appreciate the new reference in draft 4.3 to the final PES & Soil Health Working Group report in mentioning the decision for the Small Farmer Cohorts proposal (that Rural Vermont is part of) for advancing the Conservation Stewardship Program with the Vermont Farmer Ecosystem Stewardship Program (VFESP). Beyond that, version 4.3 still does not make any reference to the discourse the ALWG had with opposing stakeholders like Rural Vermont to finance large land acquisitions by land trusts and invested agencies through conservation easements in 30x30 through carbon markets. For that reason I appreciate the opportunity to include this letter as an appendix to the final ALWG inventory report with the inclusion of excerpts from Rural Vermont’s most recent statement against carbon markets from March 8th, 2024 (below).

In light of less than 24 hours for the Rural Vermont staff and board to review version 4.3 of the Report of the Agricultural Lands Working Group for the Vermont Conservation Strategy Initiative, I have to conclude that I cannot sign on to a report that was not subject to feasible decisions and formal review by represented organizations of the significant work at hand.

Respectfully submitted,
Caroline Gordon LL.M.
Legislative Director | Rural Vermont

Appendix

Rural Vermont statement against carbon markets as financing strategy for 30x30

Rural Vermont is opposed to financing conservation efforts, like conservation easements, through carbon markets. From the Rural Vermont [website](#):

The Vermont Conservation Strategy Initiative (VCSI) is underway - and it is important that we use our voice to influence it! Act 59 was passed in 2023 with a goal to conserve 30% of Vermont's total area by 2030 and 50% by 2050.

As Vermont is developing a new conservation plan - its policies and regulations more broadly - must protect and support food sovereignty, and the rights of people and communities articulated in the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas:

“Peasants and other people living in rural areas have the right to land, individually and/or collectively (...), including the right to have access to, sustainably use and manage land and the water bodies, coastal seas, fisheries, pastures, and forests therein, to achieve an adequate standard of living, to have a place to live in security, peace and dignity and to develop their cultures.” - Article 17 UNDROP (United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas, 2018)

[...]

Affirm the consensus of the PES and Soil Health Working Group against new programs based on measuring outcomes in agriculture.

The [PES and Soil Health Working Group](#) met from 2019-2023 to address questions from the VT legislature related to: ag standards and practices for better environmental outcomes, existing and potential incentives, and proposed changes and programs. Ultimately, the group opposed proposals grounded in measured outcome based models that could lead to the development of carbon and offsets markets in VT agriculture, and favored the CSP+ approach recommended by the Small Farm Cohort, which involves enhancing support for sustainable farming practices through [increasing access to](#), and improving, existing federal programs for Vermont farmers.

Protect 30x30 and land conservation efforts from being financed by carbon and / or other “off-set” markets.

Rural VT has long been in solidarity with the [National Family Farm Coalition](#), [La Via Campesina](#), the [Indigenous Environmental Network](#), the [Institute for Ag and Trade Policy](#), [Friends of the Earth](#) and others in opposing carbon and other “off-set” markets. Globally, the goal to conserve 30% of land and sea by 2030, and 50% by 2050 have been paired with the “net zero” ideology and offset markets, resulting in land grabs, and displacement of communities from working lands and waters (see recent [New York Times article](#) from Feb 20th, 2024). There is significant data around carbon markets’ ineffectiveness at actually lowering emissions, their impacts on corporate land ownership and displacement of communities, and more broadly as [false solutions](#) to the climate crisis.

Recommend policies that ensure conserved land is protected from corporate and consolidated ownership and which facilitate farmland access and ownership for farmers and farmworkers; maintaining community sovereignty over land use over time.

In VT, and around the world, we are seeing large “conservation” organizations, corporations, and governments working together towards conserving land and waters with a vision of conservation which: is largely absent of human presence; in which conserved land and agricultural land are seen as forms of wealth management, investment and a class of “natural asset”; which does not protect local communities’ democratic control of land and resources; which displaces indigenous peoples and farmers and fisherfolk; which does not take into account critical human needs such as food sovereignty and resiliency; and which positions and defers to markets and corporate actors as principle arbiters of access, control, equity, and the future of these places (check out our [glossary of terms here](#) and list of [resources here](#)). In our efforts to protect the integrity of our ecosystems and habitat, and to ensure we have farmland enough to feed the people living here - we must also protect our communities’ democratic control over, and access to, the land as one of our most critical resources.

Protect all farmland in VT from development in perpetuity, with flexibility for development of housing and essential infrastructure, and enable and support the conversion of land (including conserved land) into agriculture, and into the hands and control of the people working the land.

According to Hunger Free VT, two out of every five people in VT are food insecure. We rely upon importation for the vast majority of our food across the northeast, and New England Feeding New England reports that we need to

bring back into production 400,000 acres of land in underutilized production and an additional 590,000 of additional acres of new crop land to even meet 30% of our regional food needs by 2030. The American Farmland Trust (AFT) estimates that VT could lose another 41,000 acres by 2040 if current trends continue - or more if trends worsen. AFT also pointed to the imminent turnover of 40% of farmland within the next couple of decades as farm owners / operators age and move on from farming. Agricultural support programs have been underfunded 50% from what the administration requested in 2023. We need more independent farms, more farmers, more farmworkers, more farmland, more agroecological education and training to even meet 30% of our regional needs; and these considerations must be fundamental to the VCSI. The inventory report should outline land currently in agriculture, land in agriculture currently conserved, what land is potentially best positioned to be converted into farmland moving forward, and how much we will need to assure food security and sovereignty over time. Policies beyond conservation easements must be considered in the upcoming two year conservation planning phase.

Invite the meaningful inclusion of VT's indigenous community in the 30 x 30 process.

The enabling statute finds that “the land and waters, forests and farms, and ecosystems and natural communities in Vermont are the traditional and unceded home of the Abenaki people”, meaning that any effort to increase land conservation must include land access opportunities for Indigenous People and to all who come from historically marginalized and disadvantaged communities. President Biden’s executive order of 2021 on 30x30 explicitly honors Tribal Sovereignty and supports the priorities of Tribal Nations. Currently, neither of the State recognized Abenaki tribes are represented in any of the work groups that are part of the Vermont Conservation Strategy Initiative. We believe that the Indigenous people of Vermont have important knowledge to share about land care strategies and that their ideas for land use and conservation should be decisive for the Vermont Conservation Plan that’s projected for the end of 2025.

Recognize that the Vermont Agency of Agriculture, Food and Markets is the authority regulating VT agriculture.

Act 59 calls for enhanced support for the working lands through land conservation. It is positive that the state wants to better support the working lands and diversified farming in alignment with soil health principles. The 30x30 initiative and conservation easements specifically are not an appropriate place for regulating agricultural practices. Improving the Required Agricultural

Practices Rule is the appropriate path to addressing these concerns equitably amongst producers. The definition of sustainable land management as defined in Act 59 opens the door for linking measured outcomes of biodiversity with off-set trading schemes as a financing strategy because it can be interpreted as only including those parcels of agricultural land that enhance biodiversity at a measurable rate. Alternatively, "sustainable land management" can be interpreted to include all agricultural lands with good reason. Grasslands are specifically named - that's $\frac{3}{4}$ of all conserved agricultural lands - and the UVM State of Soil Health in Vermont initiative provides evidence that soil health across all types of farming in Vermont is presently preserving those soils' ability to support and restore biodiversity in the future. Even in those cases where current agricultural practices have the potential to negatively impact biodiversity, they are free from development and practices can be improved. All agricultural lands are important and all farms manage highly threatened natural resources that are crucial to Vermont's future food security and climate resilience.