

I. Where We Are Today: An Update to the 2024 Act 59 Conservation Inventory from Gus Seelig, Director, VHCB

We are pleased to present this memorandum to the many stakeholders who provided comments to us this summer after we presented the initial Conserved Lands Inventory under Act 59. We received much support from partners and stakeholders, interest from landowners, communities and legislators. VHCB undertakes this assignment in the context of a long held Vermont policy of compact settlement surrounded by a working landscape which stretches back to the Countryside Commission more than 90 years ago, through the work of Governor Kunin's Commission on Vermont's Future, and reaffirmed by the Vermont Council on Rural Development which identified the working Landscape as Vermonters #1 value.

VHCB stands at the crossroads of land use. The flooding from tropical Storm Irene through the July flooding of 2023 and 2024 makes Act 59's inclusion and focus on resilience absolutely essential for Vermont's future. As we move to the next phase of this work, Act 59's goal of conserving 30% of Vermont's landscape seeks the conservation of more than 180,000 more acres. That is both daunting and exciting. Moving forward effectively will require, unity, creativity and resources. It will require cooperation and an atmosphere of good will that supports private landowners and strengthens the capacity both to get conservation projects done and supports the good stewardship of conserved land. Vermont must also move quickly to utilize the resources for conservation made available from the Inflation Reduction Act.

We thank the staff at the Agencies of Natural Resources, Agriculture, Food and Markets, and Digital Services for the many great contributions they provided. As you'll find when you read through our summary of the public response, we have made very few changes to the recommendations and analysis we provided in June—beyond finalizing the initial inventory data report and uploading it to the Vermont Open Geodata Portal and providing a dashboard of the initial inventory results. There are three key reasons for this.

First, our recommendations – and the analysis that supports those recommendations – are preliminary only, assembled to initiate a long-term planning process. We recognize that, working with ANR, AAFM, ADS and the conservation community, we will continue to refine and adjust our conserved lands data, as well as our planning for the actions and investments those data support, with successive, bi-annual inventory reports.

Next, the recommendations included with the data reflect VHCB's conclusions, in consultation with ANR – and based on feedback from the full spectrum of stakeholders and workgroups – about how to proceed, but we agree they are only recommendations, not binding to future process.

Finally, and most importantly, in almost every case where we made decisions between competing viewpoints, our recommendations acknowledge the need for continued process and discussion as we enter the next phase of work to produce a conservation plan that provides the framework and goals for implementation of the law over more than a generation.

Fundamentally, VHCB believes we must celebrate our conservation success to date. We have protected over a quarter of Vermont. We must now focus on our collective work ahead. We have much work to do over the next 25 years to further protect the important lands and resources of Vermont. This work will require great collaboration and commitment from all sorts of Vermonters in order to achieve our conservation goals.

Broadly speaking, Vermonters and Vermont institutions value the Vermont landscape, its rivers and wetlands, our farms, forests and special natural places, as well as town centers, covered bridges, farmers' markets, recreational trails, villages and historic sites. Our state motto of Freedom and Unity guides us. We collaborate in numerous ways to identify and care for our commons, including clean air and water, open and accessible green spaces, waters and woods, as well as our downtowns and schools. We also build and maintain affordable housing for our workforce and our most vulnerable neighbors, and publicly fund child care and early education for Vermont families. We are working to help dozens of communities impacted by the flooding over recent years. We are focused, again, broadly speaking, on creating the conditions for healthy communities, and VHCB sees Act 59 as part of the greater effort that unites us.

We know that Vermonters don't always agree on how to prioritize the limited funding we have to sustain all of the work, and we generally agree, across all of these (and many other!) sectors, that there is not enough human capacity in our systems. We have also been reminded recently, that when natural disasters strike, as they seem increasingly likely to do, the resilience of our systems and our ability to maintain focus on long term goals and investments can be overwhelmed, often to the detriment of vulnerable populations and businesses. Indeed, the past two summers of historic, devastating flooding in multiple communities across the state have pushed Vermonters to the brink of questioning whether we are prepared to become the climate refugia Vermont is often predicted to become. Nonetheless, there is reason for optimism that Vermont is well positioned to adapt to changing climate and weather, provided that we can increasingly focus on protecting and enhancing the functions and values of our working and natural landscape not just to support our developed communities, but integrated with them.

We place hope in the fact that while Vermont's natural forest cover was largely lost over several centuries of resource extraction and intensive land use, more than eighty percent of our state is again under forest cover and/or managed for agricultural production. Roughly 27% of the state, or 1,576,783 acres, is permanently conserved, through conservation easements or in public ownership, with the intent to protect the functions, values and enterprise articulated in Act 59's vision. Roughly 2.4 million acres of our working landscape, some of which are also conserved, are enrolled in the State's Use Value Appraisal program, which incentivizes landowners to maintain their lands in forestry and farming. Vermont has implemented multiple incentive programs to prevent and reverse degradation and disconnection of our surface waters, increasingly with an understanding that this work must integrate with safety and transportation planning. And we continue to improve and refine regulatory protections for wetlands, lake shorelands, river corridors, and critical resource areas. Vermont is still a place prized for scenic beauty; a destination for outdoor adventure and relaxation; where rural enterprise is valued; and where people come to live because of the possibility to connect to the natural world is still real.

Against this backdrop, Act 59 of 2023 provides a mandate to increase focus specifically on biological diversity and community resilience, increase investments in permanent conservation outcomes across Vermont’s Conservation system, including the funding for stewardship and restoration of conserved lands, and expand capacity in public and private organizations within that system. The Act directs the Vermont Housing and Conservation Board, in consultation with the Vermont Agency of Natural Resources, to provide a blueprint of existing and new policies, programs, and practices to implement the Act’s vision for a functioning and connected, working and natural landscape; and it sets forth the aspirational goal to conserve 30% of Vermont’s land base by 2030, and 50% by 2050. After almost a full year at work to complete the first phase of this effort, VHCB can attest that our enthusiasm for this work is undiminished, even if we are increasingly aware that the process ahead will be complex, multi-faceted and rigorous. We continue to honor and acknowledge the urgency and importance of this work, just as we hope our partners, friends and public stakeholders will recognize the hard work needed by all to come together, listen and learn across our differences, and build a plan that will have an enduring legacy in Vermont.

From our perspective at VHCB, as we approach 2050 that legacy should include both permanently conserved acres of land and other supports and programs, including long term contracts. We recognize the need and great opportunity to expand protection in every category identified in Act 59, including increased ecological reserve areas and biodiversity conservation areas, while also supporting a working and sustainable landscape. We do not need to value one kind of land use or land protection methodology above others in the work ahead, but rather provide the incentives, education and support to meet all of those goals.

We will count this effort as successful if we provide the outreach and education, the planning framework, and most importantly, the funding, to help landowners, communities, Conservation organizations and other institutions to participate in the goals of land protection and restoration, connectivity and climate resilience. In other words, we read Act 59 as a broad invitation to participate in the protection of our lands and waters, whether that protection comes through permanent legal conservation, long-term, durable or contractual protection, or through voluntary care. And while it is challenging to think we can do this work at a pace to achieve the Act’s initial, narrow goal for permanent, legal conservation by 2030, we are very hopeful that, with increased public awareness and sustainable funding, the long-term vision and goals for 2050 are well within Vermont’s reach. We look forward to the hard work ahead.

II. Act 59 Conservation Inventory – Question by Question Summary of Public Response and Final Recommendations

As noted above, we provide the following summary of public comments regarding VHCB’s Initial Inventory of conserved lands, submitted under 10 V.S.A. Section 2803(b) of Act 59. In June, VHCB, in consultation with ANR, submitted our initial [Conserved Lands Inventory](#), providing a first overview of lands that meet the definition of “conserved” under Act 59.

Working with ANR since June, we are pleased to report that we have finalized this initial inventory, and we are preparing to begin the next phase of work under the Act's planning mandate, as set forth in 10 V.S.A. Section 2804(b). As more fully addressed below, we note that Act 59 requires ongoing updates to this inventory by ANR every 24 months, and we will be working closely with ANR to refine our data and analytics before the next inventory is released.

Please find below a summary and general response to the [comments](#) we received this summer from public stakeholders, legislators, partners and friends regarding the recommendations made by VHCB, in consultation with ANR, in the Inventory Report.

This is presented below in a question by question format, following the order set forth in the Act.

Question 1: *A review of the three conservation categories defined in section 2801 of this title and suggestions for developing any modifications or additions to these categories that maintain or complement the core concepts of ecological reserve areas, biodiversity conservation areas, and natural resource management areas in order to complete the conserved land inventory and inform the comprehensive strategy in the conservation plan. As part of this review, criteria shall be developed to determine the types of agricultural lands that will qualify as supporting and restoring biodiversity and therefore count towards the natural resource management area category.*

We received 36 responses to this question on the three conservation categories. Based on public input and comments received this summer, further conversation with Vermont legislators, and consultation with ANR, VHCB is recommending only one key change to the recommendations under Question 1, which is intended to address the very narrow issue of how we count and track the inclusion of productive lands on conserved agricultural parcels.

First, we note that there was general agreement regarding the central recommendation we made, which was to keep and follow the definitions set forth in statute for “Ecological Reserve Areas (ERAs),” “Biodiversity Conservation Areas (BCAs),” and “Natural Resource Management Areas (NRMAs).” Likewise, we recommended, and there was generally agreement that we should hold out from inclusion under these categories the lands we designated as “Uncategorized,” pending further analysis before the next inventory. On the other hand, how we count what lands *are* included under Natural Resource Management Areas is very much a topic of ongoing disagreement.

Many stakeholders, including legislators, responded to VHCB regarding the recommendation to include agricultural lands that produce annual crops, hay fields, or other areas of production in the NRMA category. Fewer, but still a significant number of stakeholders, wrote with concerns that not all managed timber lands should be included under this category without further analysis to demonstrate how those lands meet the statutory requirements for NRMA, and some expressed a hope that all publicly managed, conserved forest lands would be passively managed predominantly or wholly as Reserve forests going forward.

On the other hand, many stakeholders, including legislators, agreed with VHCB's recommendations regarding the inclusion of conserved working lands under the NRMA

category, with a significant number of comments that called for even more emphasis on the enterprise value of conserved lands for logging, recreation, and agricultural production. Other comments seemed generally to view the June inventory, like VHCB does, as an initial effort to document our baseline, with enough detail to generally understand how legally conserved lands fit into the framework of Act 59, but with much need for refinement and discussion going forward. And further, there are some who wrote to us recommending that this effort be repealed, that VHCB should be replaced by ANR to lead the planning effort, and/or that conservation is not a public good, and should not be publicly funded.

The data described under Question 2 below, as well as the visual map and dashboard for conserved land representing that data, have been updated only slightly since we posted the draft inventory in June. Our current analysis breaks down conserved land into five distinct groups, as laid out in the Inventory. This includes ERAs and BCAs, NRMA – forest land, NRMA – agricultural, open and other working land, as well as Uncategorized lands. We urge that this data meets the goal for an initial baseline and provides the basis for our next phase of work under Act 59. We also recommend that the Act should be read broadly, and the calculation of our data and the focus of our planning should continue to include permanently conserved working lands as we implement Act 59, even though we know that not all uses and management of our working lands are without impact to biological diversity. But we do hear and understand the calls to track and parse our data with more explicit recognition of the different approaches to land management, and the varying considerations, including how to mitigate the impacts of land use and management on sensitive receptors, across the five groupings we have identified. The management needs for lands managed by the State or the Federal government are different from the management needs of privately managed forest lands, which are in turn different than the management needs for agricultural lands.

Recommendations / Changes to Initial Inventory:

1. VHCB recommends that going forward, we should continue to include all three categories of land (ERAs, BCAs, and both sub-groupings under NRMA) in our planning effort and implementation of Act 59.

However, we further recommend, based on public comment, that we use the Phase II process to explore the feasibility of establishing a new category for AOL lands as part of the 2026 inventory, comprising areas managed for production of annual crops and hay, grazing lands, and lands managed under multi-year crop rotations.

Finally, we recommend that distinct goals, guidelines and data collection methodologies for protected AOL lands within the State's targets for 2030 and 2050 should be developed as part of the Phase II planning process that is upcoming, including recommendations for whether and how to amend Act 59 to include this new category for AOL lands.

2. No other changes are recommended.

Specific Comments of Note:

- Among comments critical of our recommendation to include all agricultural lands, we thought this comment was representative and articulate, and we also appreciated the acknowledgement that protecting agricultural lands is critical, and planning for that work should happen as a separate but included element of Act 59 implementation.

We do not support the inclusion of all agricultural lands, regardless of their intention to manage for biodiversity outcomes, in the Natural Resources Management Area category. The Conservation Categories workgroup report lays out clear pathways for the forests, wetlands, and riparian areas associated with conserved agricultural parcels to be included in the conservation inventory required by Act 59 [and] we call upon the legislature, state agencies, and VHCB to create a statewide conservation target for agriculture that is focused on food production and security and support of rural economies. Such a target could include protections for biodiversity, but we think that inventorying and accounting for agricultural practices that contribute to biodiversity targets—as defined for Act 59—might be best included in the existing Act 59 process.

- This comment is taken from a letter received from a group of legislators who sat on the House Committee for Environment and Energy during the last biennium.

It is unfortunate that rather than embrace the recommendations of the Conservation Categories working group and make progress on identifying the types of agricultural land that support biodiversity, you are on the brink of choosing to disregard the intent of the General Assembly and attempting to include all conserved agricultural lands in the inventory regardless of whether they support biodiversity or not. ... As we made clear at the meeting, we value highly the ongoing work of protecting farmland from development. That is why adding an additional category of “critical, but not meeting the biodiversity requirements of the statute,” makes sense to us. It allows us to bring everybody into the big tent, but in a way that is intellectually and scientifically consistent with the intent of the law.

- Others were also quite specific about this point of view.

Agricultural land should not be shoe-horned into the Conservation Inventory. Agriculture is an important part of the economy, and a cherished component of the Vermont landscape, but is quite fundamentally incompatible with the aims of Act 59. Obviously, agricultural production at any scale and by any means involves the expansion of monocultures, suppression of competing species and, to a greater or lesser extent, the creation of unnatural waste streams. No agricultural land is in a natural state, and any but the most curtailed, discriminating inclusion of such land in a critical inventory for the implementation of Act 59 will effectively thwart this truly enlightened legislation.

- This comment, received from a legislator with a different perspective, illustrates the support expressed by some stakeholders to identify ways to include agricultural land conservation in the implementation of Act 59 going forward.

In particular, I want to call out and applaud your decision to follow the recommendation of the Agricultural Working Group to include all conserved agricultural lands in the initial inventory of conserved lands. I know this has been perhaps the most controversial issue in the work so far, but this sets the stage for helpful and collaborative discussions with landowners going forward.

- This comment also provides support for VHCB’s recommendation.

We believe the inventory should capture all lands conserved to date and reflect the reality that many conserved lands contain a mix of farms, forests, open-spaces, and waters that are contained within a single parcel. Based on our read of the legislation and the politics, we believe it’s most beneficial to include all conserved lands within the three categories defined in the bill—at least as part of this initial inventory. Going forward, should lawmakers agree to add additional categories with clear definitions, more work could be done to re-sort the inventory[, because] [a]lmost all conserved farms in Vermont contain permanently protected forestlands, wetlands, and other features that support biodiversity and connectivity[, and also because] this is a snapshot in time, and therefore the percentage of forested and open land across these parcels will change over time, as will their potential to support biodiversity.

- This comment also supports the idea that Vermont should address the needs for conservation of agricultural lands as an included, but distinct element of Act 59 implementation.

We agree with the recommendation that no modifications be made to the conservation categories. We support the recommendation of the Conservation Working Group Report that one or more additional conservation categories be created to track the conservation of lands that support the cultural and community resilience values envisioned in the Act, such as certain ag lands. Rather than include all ag land in the natural resource management (NRMA) category we support the development of criteria to determine the types of ag land that support and restore biodiversity and could be included in the NRMA category. Additional conserved agricultural lands that do not meet the criteria should not be included in the conservation categories, but still be tracked and included in an additional category.

- This comment addressed the inclusion of all working forest lands within the inventory and as a focus for implementation.

Working forests are a critical component of Vermont's landscape. Working forests provide a multitude of ecological and conservation benefits, contribute to human health and life experience with space for recreation, scenic beauty, and wood products that help us avoid carbon intensive products like plastic. Working forests sustain the livelihoods of the many Vermonters who work in them and make renewable products from them. Conserved working forests provide all these benefits but also ensure the land is never developed, never converted to another use where these values and benefits would be lost. We therefore believe private conserved working forests must be part of conserved lands contributing to ACT 59 goals and should be part of the Natural Resource Management Area category.

- And, finally, some comments saw this debate as unimportant, and expressed the view that no more public money should be directed to conservation *until Vermont's housing crisis is solved.*

Question 2: *The amount of conserved land in Vermont that fits into each of the three conservation categories defined in section 2801 of this title, including public and private land. The inventory shall also include other lands permanently protected from development by fee ownership or subject to conservation easements.*

We received 27 responses to this question on land inventory and data. Working with ANR over the last two months, we have concluded our analysis of the current extent of conservation in Vermont. The initial Conserved Lands Inventory is public on Natural Resources Atlas and [Open Data Geoportal](#). ANR has also made this [dashboard](#) available to the public to explore the published data. Please note that the data organized on the ANR site are based on the initial recommendation from VHCB to include agricultural and open lands within the NRMA category. Whether and how these data might be reorganized based on the recommendation above to include a new AOL category is a question VHCB and ANR will address before the next inventory is provided September, 2026.

Here are the final numbers generated by our analysis of the state of conservation:

- Ecological Reserve Areas represent 240,055 acres, or 4.08% of Vermont's land area (of 5,889,121 total acres).
- Biodiversity Conservation Areas represent 235,950 acres, or 4.01% of Vermont's land area.
- Natural Resource Management Areas represent 1,100,778 acres, or 18.69% of Vermont's land area. This is further broken down as follows:
 - Forestland and Natural Cover represents 929,431 acres or 15.78% of Vermont's land area.
 - Agricultural, open and other lands represents 171,347 acres, or 2.91% of Vermont's land area.
- In addition, we identified 47,595 acres of uncategorized conserved land for further analysis before the next inventory is produced in 2026.

This dataset represents the initial inventory and analysis performed by VHCB and ANR of Vermont’s conserved lands that follows the conservation categories defined in Act 59, as interpreted by the Vermont Housing and Conservation Board, in consultation with ANR, and described in the Vermont Conservation Strategy Initiative Inventory Report (June 2024). The base data for this categorization effort is the Nature Conservancy’s 2022 Secured Areas Dataset; a compilation effort showing protected areas in 18 eastern states that are permanently protected from development.

Category Definitions:

(1) “Ecological reserve area” means an area having permanent protection from conversion and that is managed to maintain a natural state within which natural ecological processes and disturbance events are allowed to proceed with minimal interference.

(2) “Biodiversity conservation area” means an area having permanent protection from conversion for the majority of the area and that is managed for the primary goal of sustaining species or habitats. These areas may include regular, active interventions to address the needs of particular species or to maintain or restore habitats.

(3) “Natural resource management area” means an area having permanent protection from conversion for the majority of the area but that is subject to long-term, sustainable land management.

After categorization, the data were provided to ANR GIS to facilitate partner access to ArcGIS Online. Partners were asked to review and check their data, and to add land conservation projects that took place from May 2022 to 2024, which were not represented in the data. The data for the Green Mountain National Forest was updated using a March 2024 version of a management areas dataset provided by the United States Forest Service (USFS). Vermont Land Trust provided data for lands protected between May 2022 and May 2024, which was appended to the dataset. For the Agency of Natural Resources, newly protected parcels were added to the data, and available land use classification mapping, associated with long-range management planning, was compiled and categorized. The Nature Conservancy updated parcels for which they are the primary steward prior to exchanging data with ANR GIS. Efforts to add other stewarded parcels were not attempted.

Lands categorized as Ecological Reserve Area and Biodiversity Conservation Area are consistent with the interpretation and recommendations of the Conservation Categories Workgroup Report and were categorized by staff at the Vermont Chapter of the Nature Conservancy and the Vermont Fish & Wildlife Department. The Uncategorized Conserved Lands are lands identified as Gap 4 in TNC’s Secured Lands Database. These lands will be further reviewed and considered in Phase II of the CRBPA effort. Lands categorized as Natural Resource Management Areas are lands that did not meet the criteria of an Ecological Reserve Area or a Biodiversity Conservation Area, and that were not identified as Gap 4 in the Secured Lands Database.

Next, to perform the analysis of NRMA lands that fit into either Forestland and Natural Cover, or Agricultural, Open and Other Working lands, we overlaid Vermont’s Habitat Blocks, Riparian Connectivity, and 2016 Agricultural Land Cover datasets on the conserved Natural Resource Management Area data. The Habitat Block and Riparian Connectivity datasets are layers from Vermont Conservation Design. Further information about these layers is available in the Vermont Conservation Design reports. Conserved land, categorized as a Natural Resource Management Area, that was part of a Habitat Block and / or an area having Riparian Connectivity, was considered to be Forest Land or Natural Cover. Conserved land, categorized as a Natural Resource Management Area, that was part of the 2016 Agricultural Land Cover dataset, or that was not part of any of the three datasets, was considered to be Agricultural, Open and Other Land.

Generally speaking, public comments received regarding VHCB’s recommendations for the organization of the conserved land data did not focus on the methodology for data analysis, but reiterated the position of the commenter regarding the organization of conservation categories. As such, most of the comments received focus on whether the decision to include all agricultural lands was appropriate, and therefore whether that data should be included. We do hope that the links provided above to the map view of the data and dashboard will be helpful to those who asked for a visual representation of the data.

Recommendations / Changes to Initial Inventory:

1. VHCB recommends replacing the data developed for and published in the initial inventory under this question with the final 2024 data provided above, as well as adding the explanatory text above to the report to describe the methodology used to derive this initial data.
2. No other changes are recommended.

No specific comments of note are provided here, as discussed above.

Question 3: *A summary of the totality of conservation practices, both permanent and intermediate, available for reaching the goals of this chapter, including what they are, what they do, how they contribute, and what metrics are available to quantify them.*

- And -

Question 7: *How existing programs will be used to meet the conservation goals of this chapter and recommendations for new programs, if any, that will be needed to meet the goals.*

We received 17 responses to the question on conservation strategies and 16 responses to the question on conservation programs. Many of these comments expressed support for or against specific conservation practices or programs. Some of the comments focused on whether or not certain conservation practices and programs should be included towards the goals of Act 59. A few comments reflected confusion about the inclusion of non-permanent conservation

practices and programs in the draft report. For example, one commenter expressed concern that lands protected by regulations might have been included in the initial conserved land inventory.

To be clear, the conserved lands inventory that has been completed (available at this [link](#)), intends only to include lands that are permanently protected by a legal easement or by fee acquisition by a qualified conservation entity. With this said, for the purposes of meeting the 2050 conservation goals, Act 59 allows for the inclusion of “other long-term land protection mechanisms and measures that achieve the goals of Vermont Conservation Design that are enforceable and accountable and that support an ecologically functional and connected landscape”.

VHCB has not made any recommendations as to which non-permanent long term land protection mechanisms should be counted towards the 2050 goals. Rather, the report lists a number of mechanisms, including those that are non-permanent, that offer opportunities for protection and laid out a process for further exploration during Phase II of the Act 59 process. The Phase II work group focusing on conservation practices and programs will explore how to best deploy, measure and expand conservation practices and programs in order to meet the goals and vision of Act 59.

We are not recommending any major changes to the recommendation on the basis of the comments we have received. We are recommending one minor change to clarify the scope of the work that is intended to be performed by the Phase II practices and programs working group, which is described below.

Recommendation/Changes to the Initial Inventory:

1. The initial inventory made the following recommendation: “Form a Phase II work group focused on how conservation practices and programs can be best deployed, measured, and expanded to meet the goals of the act, including...” This recommendation is amended to include a focus on the vision of the act, and as such the recommendation will read as follows: “Form a Phase II work group focused on how conservation practices and programs can best be deployed, measured, and expanded to meet the goals *and vision* of the act, including...”
2. No other changes are recommended.

Specific Comments of Note:

- *In the policies section, we believe the role of land-use planning and regulatory programs should be recognized to a greater degree, such as the proactive community planning role of Act 171, and the promise of Act 181 (H.687) integration into the conservation plan. Furthermore, we believe that the Report should identify the opportunity for proactive tax policies beyond the important recommendation of examining the role of the UVA Program, and how to promote “durable” enrollment*

such as examining how conserved lands are appraised and valued, and additional tax incentives beyond UVA for promoting durable land conservation. In regard to the Current Use Program, we do not believe lands that are currently enrolled can be considered durable for meeting the purposes of the 30 by 30 or 50 by 50 goals, but we do believe the Program is vitally important to recognize in the conservation plan, and we agree further work is needed to determine how to support more durable conservation mechanisms through the Program.

- It is important to look at the three Conservation Categories. Each states that the area qualifying has "permanent protection from conversion." Permanent protections include 1) most conservation easements, ideally with third party oversight, and 2) fee ownership by a qualifying conservation organization, state agency, federal agency, or other entity whose mission matches the conservation category in question, and whose management plans and practices reflect alignment with the goals of the conservation category being analyzed. Use Value Appraisal and various term-limited incentive programs, while critically important, do not qualify as permanent protection.*
- Lands with only UVA agreements on them are not conserved. The historical rate of conversion (assuming that it is low) is not a reliable metric to rely on and conserved should really be CONSERVED and not subject to future manipulation.*
- There is a lack of focus on how changes to the UVA "Current Use" program could help reach VCD goals on private lands. Explicitly including and encouraging the protection of VCD goals, particularly around high quality natural communities and wild forests (ecological reserves) will go a long way to reaching the VCD minimum goal of 419,000 acres of old forest distributed through all biophysical regions. My 2021 report "Incorporating Wild Forests into Vermont's UVA Program" provides explicit gaps, targets and costs. Right now county foresters have limited ability to require high quality ecological forestry; changing that is low hanging fruit.*
- It seems off that there is no mention of NRCS programs that provide easements (ACEP-WRE, e.g.). Shorter term management NRCS programs also deserve mention. These can be potential "stepping stones" to longer term protection, as you mention for UVA.*
- The recommendation about "Review of opportunities to prioritize ecological health, biodiversity and community resilience on working lands" is highly disturbing. In what context is this related to the question? Do you have any information or data that there is a lack of these elements on working lands now? This shows bias and incorrect, unfounded assumptions not based on science. It is also contrary to the existing metrics.*

Question 4: *An assessment of how State lands will be used to increase conserved ecological reserve areas.*

We received 23 responses to this question on State lands and ecological reserve areas. Consistent with other questions, we found again that stakeholders are divided in their response to the recommendations provided by VHCB in the initial inventory. While several respondents noted their support for the recommendations as provided, respondents had varied perspectives. There were respondents who want to ensure continued use of State lands for the management, production and harvest of forest resources, and expressed concern that the ecological reserve designation would reduce these opportunities. On the other end of the policy spectrum, a number of responses highlight a hope to minimize forest management activities, especially on State lands, in order to establish reserve areas. Among those critical of the approach proposed by the State Lands Working Group were those who articulated that the changes proposed require additional work and public input before implementation.

Recommendations / Changes to Initial Inventory:

1. VHCB is not recommending any changes to the recommendations in the Initial Inventory regarding Question 4 and continues to embrace the approach proposed by the State Lands Working Group.

Specific Comments of Note:

- Here are two comments expressing support for the VHCB and State Lands Working Group recommendations:

The State Lands Working group did a fabulous job of summarizing the available existing tools and of presenting possible new tools. I agree with the recommendations of that group. One of the most important ones is the recommendation to create a new category, Ecological Reserves.

We support the recommendations of the workgroup tasked with evaluating the role State lands can play in increasing ecological reserves and appreciate they have been carried forward in VHCB's report. [We] would be happy to participate in the landscape scale assessment that would inform that designation (one of the workgroup recommendations).

- Among those worried that VHCB's recommendations won't provide sufficient impetus to protect old forests, we found these comments to be representative:

Because of Act 59, the call for 10% untrammeled, unmanaged wild lands by VCD, and the current national efforts with regard to mature and old growth forests on a national level, there should be a moratorium in place on any current plans (or continuing planning) for public forests that are 80 years old or more, for management, particularly

extraction, until the time when it is determined that those publicly owned lands should or should not be added to the 10% of wild lands called for in VCD (and incidentally, also in the recent 2nd edition of the “Illusion of Preservation” paper. Currently only 3.7 % of Vermont is protected wildlands.

The Ecological Reserve Areas must not be relegated to areas that have simply no commercial potential ie the higher elevation areas, wetlands etc. Mature, old growth forests must be located on productive soils where forests can achieve their maximum potential.

State lands should be used to promote old growth forests.

- As noted above, not all respondents agree that passive management or reserve designation for State lands makes sense, including these:

The new proposed "sub-categories" for state lands need broad public consideration. This is contrary to existing statutory language. The last bullet in the recommendations raises serious issues that will be brought up with the state and federal authorities. Forest Legacy was designed as an easement program to protect WORKING FOREST LANDS. You are now recommending a major change of intent of the Forest Legacy program. This will be met by significant push-back. This is a clear example of why the forest products industry is skeptical of this process. Where is the wood that we all use and need going to come from? Other countries with more sensitive ecosystems, less professional oversight and no public involvement. Unacceptable on many levels.

"Ecological reserve areas" are only appropriate in very specific circumstances, generally areas where some other factor prohibits timber harvest. Aside from sensitive areas, there should be no permanent passive management areas established. Furthermore, as they are the least valuable habitat for most species of wildlife, they should never be established on Wildlife Management Areas. The "core area" on West Mountain WMA was a grave mistake that should never be repeated. Keep these bad ideas off our public lands.

- This comment specifically calls for additional process regarding these designations:

The Draft calls for ANR to “Create new land management sub-classes, called ‘Ecological Representation Areas’ and ‘Reserve Development Areas’” (pg.36). Why invent new terms? Use “Ecological Reserves”. More significant, this recommendation rests on the premise that the “suite of tools” to designate Ecological Reserve Areas will be expanded "primarily and initially through existing State lands planning processes”. ANR’s existing “Land Classification System” is an internal process which was developed with no public input and has been controversial. Rather than rely on ad hoc procedures that “currently exist”, the Final Inventory should recommend that ANR develop a formal

and publicly accountable process for managing Vermont's public land, including identification and designation of reserves.

- These comments are expressive of other contrasting themes through our process:

Release all development rights back to land owners. Allow development anywhere that has housing issues.

All lands are protected under this for agricultural purposes for use by farmers and food production and water supply.

Access for All.

Question 5: *The implementation methods that could be utilized for achieving the goals of this chapter using Vermont Conservation Design as a guide.*

We received 17 responses to this question on the implementation of Vermont Conservation Design (VCD). Respondents generally agree with the proposed recommendations, and liked how VCD serves as a framework for achieving Act 59's 30x30 and 50x50 goals. Respondents also liked how VCD helps maintain and enhance ecological functions. Notably, several respondents raised concerns about the connection between land management and financial productivity. More specifically, two respondents expressed how carbon and biodiversity markets should not fund conservation efforts in Vermont, as they exploit nature through commodification. Additionally, some respondents stated that logging should not occur on publicly held lands and that timber should not be sold from state forests. Some respondents also suggested that additional measures should be adopted to ensure that alternative perspectives are incorporated into the process, such as making Vermont data available online to obtain feedback before using public funds to conserve land, consulting other states to get new insight on successful conservation strategies, and including rural communities' perspectives on land usage. All of these are useful suggestions, which we believe can be further discussed as we continue our work.

In addition to the concerns listed above, respondents also provided specific feedback concerning VCD, such as highlighting the importance of turning to VCD as a guide as it focuses on enhancing ecological function and protecting biodiversity. Respondents also recommended that funds should prioritize VCD goals. The topic of biophysical regions is also touched on by a respondent that stated the final inventory should explicitly state that the VCD targets for representation of ecological conditions by biophysical region are a *minimum* percentage or acreage requirements for achieving an ecologically functioning landscape. Another respondent stated that ecologically functioning landscapes should be distributed across every biophysical region in Vermont. However, other comments also raised concerns about the use of VCD to drive public investment, conservation or regulation, citing previous discussions and assurances

that VCD was an analytical framework only, and should not be used to deprive landowners of ownership or management rights against their wishes.

VHCB appreciates all of these perspectives, even though VHCB and ANR do not agree with the views of all stakeholders and believe that more dialogue is needed to create broader common understanding of our works. And let us be clear, Act 59 – and the proposed use of VCD as a analytical framework – does not in any way deprive landowners of rights or decision making power. It is always important to remember that placing land into permanent, legal conservation, just like participation in the State’s current use program, is a voluntary landowner decision. We believe our process and the implementation can, and will, strike the right balance between providing scientific analysis as a framework for planning, and giving landowners the tools and supports needed to understand all of the ways in which land can be managed.

Recommendations / Changes to Initial Inventory:

1. VHCB appreciates the respondents, as well as their comments and suggestions pertaining to question five, *the implementation methods that could be utilized for achieving the goals of this chapter using Vermont Conservation Design as a guide.*
2. VHCB is not making any changes to the recommendations listed in the Act 59 Inventory. These recommendations include conducting a spatial assessment to compare how our conserved lands inventory currently protect VCD elements, and considering how conservation programs and funding can protect, enhance and maintain ecological functionality moving forward. The last recommendation under question five suggests that a gap analysis be utilized to identify VCD priority lands that are not currently conserved and could benefit from conservation efforts. VHCB is excited to move forward with the implementation of these recommendations in Phase II and to work alongside ANR, AAFM, ADS and stakeholders.

Specific Comments of Note:

- This comment highlights how VCD aids conservation efforts, while also suggesting the final inventory state that the VCD targets for representation of ecological conditions by biophysical region are simply a *minimum* target or acreage amount to achieve an ecologically functioning landscape.

“VCD is a science-based and highly regarded approach to conservation. It is cited throughout Act 59 as the framework for achieving the Act’s 30x30 and 50x50 goals. The Act codifies use of VCD to provide “the conservation targets” for the “approximate percentages of each type of conservation category.” It is important for the Final Inventory to state explicitly that where VCD proposes percentage or acreage targets for representation of ecological conditions by bioregion in order to achieve an “ecologically functioning landscape,” these targets are not intended to limit the maximum amount of land in one of the Act’s three conservation categories, but to ensure that at least a minimum amount of land of certain characteristics is conserved.”

- This comment expresses how funds should prioritize VCD goals, while also acknowledging that lands can also be protected for reasons that exist outside of VCD goals and priorities.

“The inventory response is too process oriented. The creation of VCD was possible because of a data rich assessment of Vermont's biodiversity, with sophisticated models predicting what land areas are most important for a functioning landscape. The areas are explicitly mapped as part of VCD. The implementation is simply to make sure all conservation action is compared to VCD identified areas so that the proper levels of protection are used. Money should be prioritized to protecting VCD goals over a continuation of "business as usual" while recognizing it is at the implementation of politics may play a role - there will be land important to protect for reason's outside of VCD. Decades of landscape planning has happened in Vermont - VCD now has the scientific credibility to act upon.”

- This comment cautions against the implementation of carbon and biodiversity markets, as well as logging in state forests.

“Carbon and Biodiversity Markets only add to the exploitation of our natural systems by commodifying nature. The results of this are often at the expense of vulnerable communities. Stop selling off the timber in our State Forests, especially the mature and high elevation timber. Harvesting in headwater areas only adds to our flood vulnerability.”

Question 6: *A review of how aquatic systems are currently conserved or otherwise protected in the State, including a description of the benefits land conservation provides for aquatic systems, whether this is sufficient to maintain aquatic system functions and services, and how the implementation methods for achieving the goals of this chapter using Vermont Conservation Design as a guide would include specific strategies for protecting aquatic system health.*

We received 19 responses to this question on aquatic systems. Most of the comments supported stronger water quality protections and more funding for landowner payments to incentivize these efforts, which is in alignment with our original recommendations. Two respondents specifically endorsed the recommendations without further comment. Respondents did express concern for a range of water quality issues and urged stronger protections and more funding to support this work.

A top area of concern, with nearly one-quarter of responses mentioning this, was about raw sewage entering waterways from infrastructure failure during severe storm events. There was a call to invest more funds in our aging infrastructure to address this concern, which is only likely to become a bigger issue as the impacts from climate change grow. Two comments emphasized the impact of logging on aquatic systems. One recommended that the State’s logging standards be updated to better protect water quality to address the realities of climate change.

Another called for greater protection of undisturbed forests for the greater flood protection they provide versus managed woodlots. A few respondents focused on wetlands, with one person that recommended funding programs, like Wetland Reserve Easements (WRE), prioritize the protection of high-quality wetlands versus those most under threat by development. Generally speaking, VHCB appreciates all of these comments and recognizes the need for further education, outreach and discussion, in order to approach the work ahead within an integrated planning context, especially when it comes to road infrastructure, hazard mitigation, and productive land use.

Recommendations / Changes to Initial Inventory:

1. We do not recommend any changes to our recommendations, as we feel they already capture the essence of what was expressed by respondents. We have modified those recommendations slightly, as noted in italics below, to more affirmatively describe the work ahead:
 - Work with the broad set of stakeholders focused on aquatic health to *identify, summarize and implement* additional capacity needed to more effectively conserve aquatic systems, as well as conduct outreach and education to landowners about incentives and technical support available to help them contribute to the health of their watershed.
 - *Evaluate and identify* the best opportunities to increase and/or mandate additional resource protections for aquatic systems on newly conserved lands funded with public dollars. Also, *explore and promote* incentives and management strategies to encourage additional protections for aquatic systems on already conserved properties.
 - Collaborate with Phase II stakeholders to evaluate how we can include watershed scale and network-based approaches to conservation that would support both terrestrial and aquatic systems.
 - *Explore and recommend* new landowner incentives for short term management designations or tax incentive programs (like UVA) to support and prioritize landowner actions for aquatic system health.

Specific Comments of Note:

- *I would love to see the prioritization - and the valuation - of potential projects be high if they already provide a host of environmental and conservation benefits to their landscape.*
- *We believe that funds for more riparian easements, including money to incentivize protection of deeper, naturally vegetated riparian buffers... is essential to linking*

ecologically important areas identified by Vermont Conservation Design and to providing greater flood resilience.

- *Water is Life and must be given top priority through all Land Relation decisions.*
- *Eliminate/minimize logging in watersheds of rivers prone to flooding, especially central VT. Eliminate combined sewer systems. Move water treatment plants away from rivers. Forests are a major component of our aquatic systems. "Ecologically managed woodlands" will not provide us the flood protection that mature, and even younger undisturbed forests do. Forests containing blown down trees, uncompacted soils, healthy understories with minimal road construction are much more able to retain water and take the intensity of discharge down. One very important reason not to include all farms within the Act 59 inventory is because one loses the incentive to develop stream buffers as a way to "count" them as supporting 30/30 goals. Just on the basis of avoided costs in flood damage and nutrient reduction one could require and justify that the first 50-75 of the riparian zone must be unharvested ecological reserve area, through regulation or incentives. If done in all agricultural and forest land the benefit to aquatic system health would be enormous and relatively swift.*

Question 8: *An assessment of existing funding and recommendations for new funding sources that will be needed for acquisition of land, purchase, or donation of conservation easements, staffing capacity, and long-term stewardship to meet the goals.*

We received 21 responses to this question on existing and new funding sources for conservation. Public comments on the conservation funding recommendation expressed significant concern about the high costs associated with achieving the conservation goals outlined in Act 59 and their potential impact on state taxes specifically. Commenters worried about the financial burden on Vermont residents, particularly those who are already underserved. They emphasized the need to balance conservation efforts with equity. They also suggested that existing volunteer capacity at the local level, such as municipal conservation commissions, could play a crucial role in supporting these efforts without requiring additional operational costs. Additionally, a few comments called for exploring new methods of valuing land based on ecosystem services rather than just its use value.

However, these responses also reflected strong support for the vision of Act 59, acknowledging the need for new funding solutions, such as establishing a state revolving loan fund and increasing the use of federal funds for conservation, including technical assistance and capacity building. Some commenters advocated strongly for prioritizing land protection over capacity-building, and others recommended making private land ownership more affordable to prevent fragmentation of existing forest blocks. Some proposed leveraging public-private partnerships, but others expressed caution about engaging with carbon markets, stressing the importance of equitable and sustainable practices. Transparency in funding allocation and new revenue sources, such as penalties for land conversion, were also recommended to ensure effective and fair implementation of conservation goals.

Recommendations /Changes to Initial Inventory:

1. We do not recommend any changes to our recommendations, as we feel they already capture the essence of what was expressed by respondents.

Specific Comments of Note:

- *A general concern that this will cost too much. Vermont has a very high tax burden. In fairness, we do much better than other states in using those funds well. But I still fear this will cost a lot. There is a lot of talk about equity and underserved communities. But a huge tax burden basically prices those people out of living in Vermont in the first place....
Local municipal Conservation Commissions should be integrated into the planning and administration of funding for conservation efforts. These voluntary organizations can provide both manpower and insight into administering land conservation efforts with minimal impact on the cost of implementation.*
- *I'd like to see new or restructured programs to fund conservation easements on private or public lands, which evaluate a parcel based on its proven value to wildlife, natural water cycle, or similar goals that do not put human usage of the land as the highest criterion.*
- *I work with small family landowners in northern Vermont as a consulting forester. Most of them dearly want to protect and hold onto their forest land. We are making it impossible for them to do that. What you are suggesting perpetuates a system of land at risk of fragmentation due to the high cost of ownership driven by the need to fund government programs to fund more land conservation!*
- *I serve on the board of a small all-volunteer land trust. Our number one expense is property taxes. All of our conserved land is enrolled in UVA, yet property taxes take a huge bite out of our finances every year and this impacts our capacity to conserve more land.*
- *How is the state/VHCB going to ensure that the carbon and biodiversity markets it invests in are equitable and truly sustainable?*

Question 9: *An equity assessment of existing land protection and conservation strategies and programs.*

VHCB received 20 responses regarding our recommendations for this question on how to measure the equity of existing programs and strategies for land protection and conservation. Among these comments, we received several emails from friends within Vermont's Indigenous community who helped us to refine those recommendations before they were finalized on June 30. We received helpful comments from these many partners with humility and in the spirit of continued learning together. It continues to be our intent at VHCB to implement Act 59 planning mandate in an open and collaborative manner, including stakeholders, partners, landowners and members of the public in appropriate roles. This was the intent of the recommendations we included under this question, which were forward focused on additional outreach and process to stakeholders from historically marginalized communities, others whose viewpoints are not part of the conservation community mainstream, in order to increase the diversity of thought and viewpoints on this work. We also understand and appreciate those comments urging us to engage the public with more clarity regarding the decision-making process we will use to produce the Phase II Conservation Plan; we agree that inclusion without clarity can be frustrating, and we will endeavor to provide clear roles and expectations for participation.

Most respondents expressed some level of appreciation for the continued focus on inclusion and equity, and many also provided recommendations to improve outcomes for participants going forward. Many respondents noted particular groups for additional focus and outreach, including members of Vermont's BIPOC and Indigenous communities, landowners, scientists, low-income Vermonters and others. Others warned about conducting a process like this without changing the way in which those groups are engaged. And others were specifically worried about the cost implications of an effort like Act 59, and whether other more important needs should be funded before conservation efforts. VHCB appreciates the many nuanced reflections offered in these comments, and although we take the responsibility of equity and inclusion seriously, we think our initial recommendations provide a strong framework for next steps.

Recommendations / Changes to Initial Inventory: ...

1. VHCB is not making any changes to the recommendations provided in the Initial Inventory.

Specific Comments of Note:

- *As an Indigenous person (federally registered Citizen Potawatomi Nation tribal member) living in Vermont, I applaud efforts to include input and perspectives of Vermont's multiple and diverse Indigenous communities. The process has been somewhat muddled and inconsistent, in part due to poor outreach from those focused on BIPOC input who seem to exclude known Indigenous leaders from their communications and solicitation of input.*

- *Public lands are open to everyone, and unposted private lands are open to everyone. That is equity. For more equity, create an outreach program to encourage landowners to open more private lands to recreational access. Equity, in the modern idiom, seems to be here as more of a bookmark than anything meaningful. A nod to ensuring we can say we checked that box.*
- *This is an important section and a vital component. Equity is severely missing in the existing system. Land conservation efforts have been done with little consideration of urban and suburban populations. You need to drive to the conserved land. More efforts need to be made to conserve land closer to population centers. Many of the folks I work with in the forest products industry, landowners and hunters/anglers feel disenfranchised by this process. They depend on the working landscape to have to work, That is included in Act 59 but seems to be forgotten in this process. That needs to change. You should not talk about equity and not make a sincere and successful effort to reach out to those who are underrepresented and most impacted.*
- *This is a tough one, in part because of how developmental and land use patterns have resulted in low-income families living in areas that were cheap (because marginal for human habitation) and do not provide for safety in the changing climate. Floodplains come to mind. Rebuilding back in the same flood-prone spot is to invite repeated disasters, but Vermont has not solved the problem of where to re-locate these homesteads to safer land. There is probably a NIMBY problem of moving a mobile home community to higher land, but mobile homes are some of the lowest-cost housing available. We lived in a mobile home while building enough equity to purchase a house. Many older homes are also at climate risk. How do you convince folks to move away from land that their generations have occupied?*
- *There is a lot of talk about equity and underserved communities. But the additional tax burden this will impose basically prices those people out of living in Vermont in the first place. I suspect you will be successful in correcting equity issues, but only because you cause the poor to leave the state.*

Question 10: *An evaluation of the opportunities related to intergenerational land transfer trends and how the State could proactively direct resources to achieve conservation at the time of transfer.*

We received 14 responses to this question on intergenerational land transfer. Most supported the inclusion of this consideration in the report and called for greater support of landowners going through intergenerational land transfers. Several mentioned the need to keep working lands affordable, suggesting that supporting agricultural and forestry industries by reducing regulatory barriers and applying property tax reform as the simplest means to achieve this. Two people noted their opposition to state funding for conservation. Another person

expressed concern about Act 59 leading to eminent domain. Several people noted that Vermont Land Trust and The Nature Conservancy's use of conservation as a land transfer tool as a good model. One person urged consideration of alternative land relationship models, beyond fee simple and easements, to accomplish this work.

Recommendations / Changes to Initial Inventory:

1. We do not recommend any changes to our recommendations, as we feel they already capture the essence of what was expressed by respondents. These recommendations are as follows:

Specific Comments of Note:

- *Has anyone thought of just taxing land at less than its development value? Changing how we fund education? Rewarding generations of private landowner stewardship rather than confiscating land value through regulatory expansion? This is a complex issue that drives the need for conservation across our state. I am glad to see it as part of the thought process.*
- *This is a key concern of rural landowners...and an opportunity to help achieve both the landowner's goals and the state's objectives. Investment in outreach programs and incentives would have a huge payback.*
- *We should support intergenerational land transfer by ensuring that tracts are able to be affordably kept intact. Supporting agriculture and our forest products industry are the simplest and most direct mechanisms for this. We should be promoting forest product infrastructure by alleviating Act 250 barriers and acknowledging the role of timber harvest in maintaining habitat connectivity by reducing fragmentation.*
- *The State should not be involved in transfers of land in the private sector.*
- *We need to move toward alternate models of Land relationship, outside of fee simple, individual holdings. Community trusts, commons, public co-ownership, rights of nature (not just humans). Intergenerational transfers can be a point of inflection if these options are made legal, known, and readily usable.*

III. Act 59 Phase II Process Overview

With our initial inventory completed, we turn next to the exciting and critical task of re-engaging Vermonters in the next phase of this work to implement Act 59, preparing a conservation plan that will implement the vision and goals of Act 59. Our process in the next phase will identify priorities and funding to achieve Vermont's ambitious land protection goals and will provide a template for actions and investments over the next thirty years by government, nonprofit, and private entities. The process will include public participation and outreach through a technical

advisory committee, working groups, and public meetings. Please see a graphic overview of the next phase of work, which has been added below.

The primary deliverable for Phase II of Act 59 is the creation of a comprehensive Conservation Plan, to be submitted by December 31, 2025. This plan will include:

1. Comprehensive Strategy:

- **Conservation Goals:** A detailed strategy to achieve Vermont's conservation goals, ensuring protection for biological diversity, habitat, agricultural lands, working forests, historic properties, and recreational lands.
- **Integrated Approach:** The strategy will align with broader conservation objectives and integrate various land uses to create a cohesive vision for Vermont's landscape.
- **Coalition Alignment:** The comprehensive plan will help to define the roles and capacity needed for all partners to collaborate to implement the conservation plan.
- **Financial Capacity Building:** The plan will provide a blueprint for investments in land acquisition, conservation planning, and long term stewardship and management.

2. Implementation Methods:

- **Vermont Conservation Design:** Implementation methods will be guided by Vermont Conservation Design (VCD), ensuring that conservation actions are scientifically informed and effectively address ecological needs.
- **Examples of Other Frameworks to be Consulted:**
 1. FPR's Forest Action Plan
 2. F&W's Wildlife Action Plan
 3. Tactical Basin Plans
 4. TMDLs
 5. Regional & Local Conservation Plans / Priorities

3. Equitable Access Recommendations:

- **Access to Conserved Lands:** Recommendations for increasing equitable access to conserved lands and land-based enterprises. This will focus on ensuring that all communities, including underserved and marginalized groups, have meaningful opportunities to benefit from and engage with conserved areas.
- **Affordability & Resources:** Address rising costs of land and land management and development strategies to keep access to land and land-based enterprise accessible to all Vermonters.

- **Collaboration & Network:** Work with regional and local groups to expand opportunities for farm and forest enterprise, local trail groups, sportsmen & women, and other underrepresented users.

4. Focused Investments:

- Working farms, forests, & recreation areas
- Community focused projects
- Riparian corridors, wetlands, floodplains and other areas that promote climate and flood resilience
- Natural areas, interior forest blocks, connectivity corridors
- Critical habitats
- Capacity funding for public agencies, NGOs and others for land acquisition, conservation planning, and long-term stewardship and monitoring